

December 07, 2022

Ms. Kellen Tardaewether Oregon Department of Energy 550 Capitol Street NE, 1st Floor Salem, OR 97301

# Re: Request for Amendment 1 for the Boardman to Hemingway Transmission Line Project

Dear Ms. Tardaewether,

Idaho Power Company (Certificate Holder), a wholly owned subsidiary of IDACORP, Inc. is requesting an amendment (RFA 1) to the Boardman to Hemingway Transmission Line Project (Project) Site Certificate. The Project consists of approximately 300 miles of high-voltage electric transmission line between the proposed Longhorn Station near Boardman, Oregon, and the Hemingway Substation in southwestern Idaho.

IPC is submitting this RFA 1 to amend the site boundary approved in the Site Certificate to accommodate: (a) re-location of the transmission line on three properties based on IPC's coordination and agreement with the affected landowners; and (b) refinement of the location of certain roads resulting from additional design and engineering review.

The materials delivered as part of RFA 1 include:

- PDF and Word versions of the RFA 1, delivered electronically via a Microsoft Teams site
- Two (2) printed hard copies mailed to ODOE office in Salem, OR

The Certificate Holder submits RFA 1 pursuant to Oregon Administrative Rule (OAR) 345-027-0350(4)(c) or "Type A" amendment review process because IPC is proposing to design, construct, and operate a portion of the Project in a manner that is different from the description in the Site Certificate and that requires a change to condition GEN-GS-06.

Thank you for your consideration. We look forward to working with you during the amendment process. Please feel free to contact Joe Stippel [(208)-388-2675] or Dave Wymond [(208) 388-2742] at any time with any questions or comments regarding this RFA 1.

Sincerely,

Joe Stippel

Idaho Power Company

Dave Wymond

# **PUBLIC NOTICE**



# **Boardman to Hemingway Transmission Line**

Receipt of Preliminary Request for Amendment 1 of Site Certificate

#### **Summary:**

Date Notice Issued: December 15, 2022

<u>Site Certificate Amendment Request</u>: Amend the site boundary to accommodate: (a) re-location of the transmission line on three properties; and (b) refinement of the location of certain roads, as summarized in Table 1 below.

<u>Facility Location</u>: The approved facility is located in five counties in Oregon: Morrow, Umatilla, Union, Baker and Malheur. The proposed changes in the amendment would be located within all five counties.

Review Process: Type A

Information Only: Please note, this notice is to provide early notification of this amendment request. There is no comment period associated with this phase of review.

Introduction: On December 7, 2022, the Oregon Department of Energy (Department or staff), staff to the Energy Facility Siting Council (Council or EFSC), received preliminary Request for Amendment 1 (pRFA1) to the Boardman to Hemingway Transmission Line (facility) from the certificate holder, Idaho Power Company (IPC).

Description of Facility (Approved): The approved but not constructed facility is an approximately 300 mile (275 miles in Oregon), single circuit, 500 kilovolt (kV) electrical transmission line which includes transmission towers, a substation, and access roads as well as removal of approximately 12 miles of existing 69-kV transmission line, rebuilding of approximately 1 mile of a 230-kV transmission line, rebuilding of approximately 1 mile of an existing 138-kV transmission line.

**Description of Amendment Request:** pRFA1 seeks Council approval for the following:
(a) re-location of the transmission line on three properties based on IPC's coordination and agreement with the underlying landowners; and

(b) refinement of the location of certain roads resulting from additional design and engineering review. This includes approximately 7.2 miles of 500-kV transmission line alternatives, and 33.8 miles of access road changes associated with the approved route. The proposed site boundary additions cover 952.5 acres. More detail of these proposed changes are included in pRFA1 Table 4.1-1, page 5.

**Facility Location:** The facility site boundary is located in Morrow, Umatilla, Union, Baker and Malheur counties. For detailed maps associated with the proposed amendment, please see pRFA1 Figures 4-1 and 4-2 at <a href="https://www.oregon.gov/energy/facilities-safety/facilities/Pages/B2H.aspx">https://www.oregon.gov/energy/facilities-safety/facilities/Pages/B2H.aspx</a>

You may also view the facility location by visiting our online mapping tool at https://tinyurl.com/EFSCmap.

#### **EFSC Review Process:**

#### Overview

The site certificate amendment process is a consolidated, comprehensive siting process. The certificate holder must demonstrate that the facility, with the changes proposed in the amendment request, meets all applicable EFSC standards established under Oregon Revised Statute (ORS) 469.501 and set forth in Oregon Administrative Rule (OAR) Chapters 345, Division 22, 24 and 27 as well as all other applicable Oregon statutes, rules and standards.

#### **Preliminary Request for Amendment**

The current phase consists of staff reviewing the amendment request, along with applicable state agencies, local government and tribal governments to ensure there is information adequate for Council to make findings or impose conditions on all applicable Council standards.

#### Complete Request for Amendment

Under OAR 345-027-0363(5), an amendment is complete when the Department finds that the certificate holder has submitted information adequate for the Council to make findings or impose conditions on all applicable Council standards.

#### **Draft Proposed Order**

This document is staff's initial recommendation to EFSC, who are the final decision makers, on whether or not each applicable standard is met. The DPO will include staff's analysis of the amendment request as well as comments received from state agencies, local governments and tribal governments. The DPO will include recommended findings of facts, conclusions or law and conditions.

Issuance of the DPO will initiate a public comment period.

Under <u>Type A review</u>, in addition to the written public comment period there will be an in person public hearing in the vicinity of the facility which includes an opportunity for oral comments. To preserve your right to request a contested case proceeding and any subsequent appeal of EFSC's decision, you must comment during the public comment period on the DPO, either orally at the public hearing or in writing during the comment period.

Following the conclusion of the comment period on the DPO, EFSC will review the DPO and all submitted comments and provide their comments to the Department.

#### Proposed Order

Following the conclusion of the DPO comment period, the Department must issue a Proposed Order, staff's second recommendation to EFSC. Changes made from the DPO to the Proposed Order are based on the comments of the Council and any other comments made before the close of the public comment period.

#### Contested Case

To determine that a request justifies a contested case, the Council must find that the request raises a significant issue of fact or law that may affect the Council's determination that the facility, with changes proposed by the amendment, meets the applicable laws and Council standards.

#### Final Order

Following a contested case proceeding, or the Proposed Order if there is no contested case proceeding, the Council shall issue a Final Order either approving or denying the proposed amendment to the site certificate.

#### **Receipt of this Notice:**

Please note that you may be receiving this notice for multiple reasons:

- You own property in farm or forest zone located within or adjacent to (within 500 feet) the property on which the proposed changes would be located. You will automatically receive all future notices on this facility.
- You own property outside an urban growth boundary and not within a farm or forest zone within or adjacent to (within 250 feet) the property on which the proposed changes would be located. You will automatically receive all future notices on this facility.
- You have requested to receive paper notices on the Boardman to Hemingway Transmission Line.
   If you wish to be removed from this mailing list, please contact Kellen Tardaewether.
- 4. You have previously signed up via GovDelivery/ClickDimensions or by contacting ODOE to receive notices related to the Boardman to Hemingway Transmission Line or all EFSC project-related notices. You will automatically receive all future notices per your request, unless you unsubscribe via ClickDimensions or by contacting ODOE.

**More Information:** Please contact Kellen Tardaewether, Senior Siting Analyst, at the phone, email address or mailing address listed in this notice.

Kellen Tardaewether, Senior Siting Analyst Oregon Department of Energy 550 Capitol Street NE, 1<sup>st</sup> Floor Salem, OR 97301

Email: kellen.tardaewether@energy.oregon.gov

Phone: 503-586-6551

More information about the facility and updates on the review process is available using any of the following options:

#### 1) Announcement on Department's Website:

More details on the Boardman to Hemingway Transmission Line and a copy of pRFA1 are available on the project page at: <a href="https://www.oregon.gov/energy/facilities-safety/facilities/Pages/B2H.aspx">https://www.oregon.gov/energy/facilities-safety/facilities/Pages/B2H.aspx</a>

Additional resources to help you participate in the state siting process can be found at: <a href="http://www.oregon.gov/energy/facilities-safety/facilities/pages/default.aspx">http://www.oregon.gov/energy/facilities-safety/facilities/pages/default.aspx</a>

2) Updates by email/mail: Subscribe to ClickDimensions, a self-managed, automated email system that sends notices and updates related to the Boardman to Hemingway Transmission Line as well as any or all other energy facilities and events under EFSC jurisdiction. For more information, please visit: https://tinyurl.com/ODOE-EFSC.

To receive notices by U.S. Mail, please contact Kellen Tardaewether.

**3)** In hardcopy: Hard copies of pRFA1 are available for public inspection at:

Oregon Department of Energy 550 Capitol Street NE Salem, OR 97301

Please contact Kellen Tardaewether if you wish to arrange a time to review hard copies. Hard copies will be provided at reasonable cost upon request to the Department.

#### **Accessibility information:**

The Oregon Department of Energy is committed to accommodating people with disabilities. If you require any special physical or language accommodations, or need information in an alternate format, please contact Nancy Hatch at 503-428-7905, toll-free in Oregon at 800-221-8035, or email to nancy.hatch@energy.oregon.gov.

**Table 1: Proposed Site Boundary and Access Road Changes** 

Proposed Site Boundary Additions	County	Length of Change – Transmission Line (miles)	Length of Change – Access Road (miles)	Area of Change (acres)	Description of Site Boundary Change
Little Juniper Canyon Transmission Line Alternative	Morrow	1.0	1.4	78.7	Shifted transmission line to the west to minimize impacts to proposed solar facility
Access Road Changes in Morrow County	Morrow	NA	4.2	61.9	Road design changes
Access Road Changes in Umatilla County	Umatilla	NA	3.4	71.3	Road design changes
Access Road Changes in Union County	Union	NA	1.8	36.7	Road design changes
True Blue Gulch Transmission Line Alternative	Baker	4.3	8.6	422.8	Adjusted transmission line to the west and south to minimize noise and visual impacts
Durbin Quarry Transmission Line Alternative	Baker	1.9	2.1	130.0	Shifted transmission line to avoid crossing ODOT quarry
Access Road Changes in Baker County	Baker	NA	17.0	95.5	Road design changes
Access Road Changes in Malheur County	Malheur	NA	7.4	139.1	Road design changes
TOTAL	NA	7.2	45.9	1,036.0	NA

# **Request for Amendment #1**

# **Boardman to Hemingway Transmission Line Project**

# Prepared for:



Prepared by:

# **Tetra Tech**

3380 Americana Terrace, Suite 201 Boise, ID 83706 (208) 389-1030

December 2022

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Attachment 8-1. Property Owners of Record

### **ACRONYMS AND ABBREVIATIONS**

ACEC Area of Critical Environmental Concern

ASC Application for Site Certificate

BCZSO Baker County Zoning and Subdivision Ordinance

BLM Bureau of Land Management

CHZO City of Huntington Zoning Ordinance

CI Commercial Industrial
COB COB Energy Facility LLC
CR Commercial Residential
Council or EFSC Energy Facility Siting Council

OTUD

CTUIR Confederated Tribes of the Umatilla Indian Reservation

dBA A-weighted decibels EFU Exclusive Farm Use

ESH Essential Salmonid Habitat

HAC Historical, Archeological or Cultural HPMP Historic Properties Management Plan

IPC; Certificate Holder Idaho Power Company
JPA Joint Permit Application

kV kilovolt

LiDAR light detection and ranging MCC Malheur County Code

MCCP Morrow County Comprehensive Plan MCZO Morrow County Zoning Ordinance

NED National Elevation Dataset

NEPA National Environmental Policy Act
NHD National Hydrography Dataset

NRCS Natural Resources Conservation Service
NRHP National Register of Historic Places

NSR noise-sensitive receptor
NWI National Wetlands Inventory

NWSTF Boardman Naval Weapons Systems Training Facility – Boardman

OAR Oregon Administrative Rules

ODEQ Oregon Department of Environmental Quality
ODFW Oregon Department of Fish and Wildlife

ODOE Oregon Department of Energy
ODSL Oregon Department of State Lands

ORS Oregon Revised Statutes
PA Programmatic Agreement

Project; B2H Boardman to Hemingway Transmission Line Project

RFA 1 Request for Amendment 1

RSA Rural Service Area

SHPO State Historic Preservation Office
STATSGO State Soil Geographic Database
UCCP Umatilla County Comprehensive Plan
UCDO Umatilla County Development Ordinance

UCZPSO Union County Zoning, Partition, and Subdivision Ordinance

USDA U.S. Department of Agriculture

USFS U.S. Department of Agriculture, Forest Service

USGS U.S. Geological Survey
WAGS Washington ground squirrel
ZVI zone of visual influence

### 1.0 INTRODUCTION

# 1.1 Project Summary and Request

Idaho Power Company (IPC or Certificate Holder) has a site certificate to construct, operate, and maintain the Boardman to Hemingway 500-kilovolt (kV) transmission line (Project). The Project consists of approximately 300 miles of high-voltage electric transmission line between the proposed Longhorn Station near Boardman, Oregon, and the Hemingway Substation in southwestern Idaho. The Project is sited across approximately 275 miles in Oregon and 24 miles in Idaho. The Project includes construction of a single-circuit 500-kV transmission line, removal of approximately 12 miles of existing 69-kV transmission line, rebuilding of approximately 1 mile of a 230-kV transmission line, and rebuilding of approximately 1 mile of an existing 138-kV transmission line.

IPC is submitting this Request for Amendment 1 (RFA 1) to amend the site boundary approved in the Site Certificate (the "Previously Approved Site Boundary") to accommodate: (a) relocation of the transmission line on three properties based on IPC's coordination and agreement with the affected landowners; and (b) refinement of the location of certain roads resulting from additional design and engineering review (the "Proposed Site Boundary Additions"). This includes approximately 7.2 miles of 500-kV transmission line alternatives, and 33.8 miles of access road changes associated with the Approved Route. The Proposed Site Boundary Additions cover 952.5 acres and are described in detail in Section 4.0 below.

# 1.2 Procedural History

The Oregon Energy Facility Siting Council (EFSC or Council) approved a site certificate for the Project on September 27, 2022 (Site Certificate). This is IPC's first request for an amendment to the Site Certificate.

# 2.0 AMENDMENT DETERMINATION AND APPLICABLE REVIEW PROCESS

# 2.1 Amendment Required for Change to Site Certificate Condition GEN-GS-06

OAR 345-027-0350. Changes Requiring an Amendment

Except for changes allowed under OAR 345-027-0353, an amendment to a site certificate is required to:

- (1) Transfer ownership of the facility or the certificate holder as described in OAR 345-027-0400;
- (2) Apply later-adopted law as described in OAR 345-027-0390;
- (3) Extend the construction beginning or completion deadline as described in OAR 345-027-0385:
- (4) Design, construct, or operate a facility in a manner different from the description in the site certificate, if the proposed change:

- (a) Could result in a significant adverse impact that the Council has not addressed in an earlier order and the impact affects a resource or interest protected by an applicable law or Council standard:
- (b) Could impair the certificate holder's ability to comply with a site certificate condition; or
- (c) Could require a new condition or a change to a condition in the site certificate.

IPC is submitting this RFA 1 per Oregon Administrative Rule (OAR) 345-027-0350(4)(c), because IPC is proposing to design, construct, and operate a portion of the Project in a manner that is different from the description included in the Site Certificate and that requires a change to Site Certificate Condition GEN-GS-06. Specifically, IPC is proposing to amend the Previously Approved Site Boundary by adding the Proposed Site Boundary Additions as alternative corridors to accommodate: (a) requests by three landowners to re-locate the Project on their land; and (b) refinements of the Project roads based on additional engineering and design review. Because the Proposed Site Boundary Additions do not appear in "ASC Exhibit C Attachment C-2 and C-3 mapsets," as referenced in GEN-GS-06, IPC is requesting that the condition be amended to incorporate the Proposed Site Boundary Additions as follows:

GEN-GS-06: Subject to conditions of the site certificate, the certificate holder may construct the facility anywhere within the site boundary (approved corridor(s)), and as described in ASC Exhibit B and represented in ASC Exhibit C Attachment C-2 and C-3 mapsets and Amendment 1 mapsets. The approved corridors include:

- a. The transmission line route extending approximately 273-miles through Morrow, Umatilla, Union, Baker, and Malheur counties;
- b. West of Bombing Range Road alternative 1 and the west of Bombing Range Road alternative 2 in Morrow County;
- c. Morgan Lake alternative in Union County; and
- d. Double Mountain alternative in Malheur County; and
- e. Amendment 1 site boundary additions.

# 2.2 Application of Type A Review Process

OAR 345-027-0351(2): The type A review process, consisting of OAR 345-027-0359, 345-027-0360, 345-027-0363, 345-027-0365, 345-027-0367, 345-027-0371 and 345-027-0375, is the default review process and applies to the Council's review of a request for amendment proposing a change described in OAR 345-027-0350(2), (3), or (4).

Because IPC is seeking an amendment proposing a change described in OAR 345-027-0350(4), the Type A review process is the default review process and applies to the Council's review of RFA 1. Pursuant to OAR 345-027-0051(2), the terms of the Type A review process are set forth in OAR 345-027-0359, OAR 345-027-0360, OAR 345-027-0363, OAR 345-027-0365, OAR 345-027-0367, OAR 345-027-0371, and OAR 345-027-0375.

### 3.0 CERTIFICATE HOLDER INFORMATION

OAR 345-027-0060(1) sets forth the requirements for a request for amendment.

OAR 345-027-0360(1): To request an amendment to the site certificate required by OAR 345-027-0050(3) or (4), the certificate holder must submit a written preliminary request for amendment to the Department that includes the following:

(a) The name of the facility, the name and mailing address of the certificate holder, and the name, mailing address, email address and phone number of the individual responsible for submitting the request;

. . .

# 3.1 Name of the Facility

The name of the facility is the Boardman to Hemingway Transmission Line Project.

# 3.2 Name and Mailing Address of the Certificate Holder

The name and mailing address of the Certificate Holder is:

Idaho Power Company 1221 W. Idaho Street Boise, ID 83702-5627

IPC is a wholly owned subsidiary of IDACORP, Inc.:

IDACORP, Inc. 1221 W. Idaho Street Boise, ID 83702-5627

# 3.3 Name and Mailing Address of the Individuals Responsible for Submitting the Request

The names, mailing addresses, email addresses, and phone numbers of the individuals responsible for submitting this RFA 1 on behalf of IPC are:

Joe Stippel, Project Manager Idaho Power Company 1221 W. Idaho Street Boise, ID 83702-5627 JStippel@IdahoPower.com (208) 388-2675

Dave Wymond, Senior Resource Professional Idaho Power Company 1221 W. Idaho Street Boise, ID 83702-5627 DWymond@IdahoPower.com (208) 388-2742

# 4.0 DESCRIPTION OF PROPOSED CHANGE

OAR 345-027-0360(1): To request an amendment to the site certificate required by OAR 345-027-0350(3) or (4), the certificate holder must submit a written preliminary request for amendment to the Department that includes the following:

. . .

- (b) A detailed description of the proposed change, including:
- (A) A description of how the proposed change affects the facility;
- (B) A description of how the proposed change affects those resources or interests protected by applicable laws and Council standards, and
- (C) The specific location of the proposed change, and any updated maps and/or geospatial data layers relevant to the proposed change;

OAR 345-027-0360(1)(b) requires a description of the proposed change, including a description of the effect on the facility, the effect on protected resources and interests, and the location of the proposed change.

# 4.1 Effect on the Facility

OAR 345-027-0360(1)(b)(A): A description of how the proposed change affects the facility;

The Project, as approved, is a yet-to-be constructed electrical transmission line facility. Since the submission of the Application for Site Certificate (ASC) for the Project, IPC worked with certain landowners to identify an alternative route on their respective properties that would minimize impacts to the landowners while also meeting IPC's design criteria and avoiding impacts to sensitive resources. In addition, based on further design and engineering review, IPC has refined the location of several roads associated with the Project as approved in the Site Certificate. IPC is including road design changes in this RFA 1 where the changes extend outside of the Previously Approved Site Boundary.

The Proposed Site Boundary Additions would be in general proximity to the Previously Approved Site Boundary, be constructed of the same materials and components previously described in Exhibit B of the ASC and approved by the Council in its Final Order, and affect or occur in similar fish and wildlife habitat types, topography, and land uses to those previously considered. Accordingly, as discussed in more detail in Sections 5 through 8 below, the Proposed Site Boundary Additions will neither create significant new impacts, affect interests protected by the Council's siting standards, nor alter the basis of the Council's previous findings that the Project complies with all applicable laws and standards.

IPC is requesting that the Proposed Site Boundary Additions be represented as alternative routes, allowing IPC the option to develop either the alternatives or the original routes, depending on the outcome of further discussions between IPC and the landowners.

The Proposed Site Boundary Additions are summarized below in Table 4.1-1.

**Table 4.1-1. Proposed Site Boundary Additions** 

Proposed Site		Length of Change –	Length of Change –	Area of	Description of Site
Boundary Additions	County	Transmission Line (miles)	Access Road (miles)	Change (acres)	Boundary Change
Little Juniper	Morrow	1.0	1.4	78.7	Shifted
Canyon					transmission
Transmission Line					line to the
Alternative					west to
					minimize
					impacts to
					proposed solar facility
Access Road	Morrow	NA	4.2	61.9	Road design
Changes in	IVIOITOW	INA	4.2	01.9	changes
Morrow County					oriariges
Access Road	Umatilla	NA	3.4	71.3	Road design
Changes in					changes
Umatilla County					
Access Road	Union	NA	1.8	36.7	Road design
Changes in Union					changes
County True Blue Gulch	Baker	4.3	8.6	422.8	Adjusted
Transmission Line	Dakei	4.0	0.0	722.0	transmission
Alternative					line to the
					west and
					south to
					minimize
					noise and
					visual
Durbin Quarry	Baker	1.9	2.1	130.0	impacts Shifted
Durbin Quarry Transmission Line	Davel	j 1.8	۷.۱	130.0	transmission
Alternative					line to avoid
					crossing
					ODOT
					quarry
Access Road	Baker	NA	17.0	95.5	Road design
Changes in Baker					changes
County	Malhaur	NIA	7.4	120.1	Dood dooi::::
Access Road Changes in	Malheur	NA	7.4	139.1	Road design
Malheur County					changes
TOTAL	NA	7.2	45.9	1,036.0	NA

ODOT = Oregon Department of Transportation

### 4.2 Effect on Protected Resources or Interests

OAR 345-027-0360(1)(b)(B): A description of how the proposed change affects those resources or interests protected by applicable laws and Council standards, and

In Sections 5 through 8 below, IPC discusses in detail how the Proposed Site Boundary Additions will affect resources and interests protected by applicable laws and the Council standards.

# 4.3 Location of the Proposed Change

OAR 345-027-0360(1)(b)(C): The specific location of the proposed change, and any updated maps and/or geospatial data layers relevant to the proposed change;

The specific locations of the Proposed Site Boundary Additions are shown in Figure 4-1 and summarized in Table 4.1-1. In Section 5.2, IPC further describes the locations of the Proposed Site Boundary Additions in relation to information requested under OAR 345-021-0010(1)(c).

### 5.0 DIVISION 21 INFORMATION

OAR 345-027-0360(1): To request an amendment to the site certificate required by OAR 345-027-0350(3) or (4), the certificate holder shall submit a written preliminary request for amendment to the Department that includes the following:

. . .

(c) References to any specific Division 21 information that may be required for the Department to make its findings;

IPC has identified certain Division 21 ASC information related to the Project Description, the Project Location, and Waters of this State that may be required for the Council to make its findings on this RFA 1.

# 5.1 Project Description

The Exhibit B requirements of OAR 345-021-0010(1)(b) require an applicant to provide certain information related to the description of the project. Idaho Power has identified below those subsections of that provision that may be required for the Department to make its findings on this amendment request.

#### 5.1.1 Corridor Selection Assessment

OAR 345-021-0010(1)(b)(D): If the proposed energy facility is a pipeline or a transmission line or has, as a related or supporting facility, a transmission line or pipeline that, by itself, is an energy facility under the definition in ORS 469.300, a corridor selection assessment explaining how the applicant selected the corridors for analysis in the application. In the assessment, the applicant must evaluate the corridor adjustments the Department has described in the project order, if any. The applicant may select any corridor for analysis in the application and may select more than one corridor. However, if the applicant selects a new corridor, then the applicant must explain why the applicant did not present the new corridor for comment at an

informational meeting under OAR 345-015-0130. In the assessment, the applicant must discuss the reasons for selecting the corridors, based upon evaluation of the following factors:

. . .

IPC underwent an extensive siting process over several years, evaluating several routing and re-routing options to avoid as many identified constraints and sensitive resources as practicable. The result of IPC's siting studies, and consideration of the outcome of the federal review process, resulted in the proposed and alternative routes identified in the ASC.

Following the submission of the ASC, IPC has continued to communicate with the landowners affected by the Project. In the case of the landowners affected by this RFA 1, IPC and the landowners have identified an alternative route on their respective property that would minimize impacts to the landowners while also meeting IPC's design criteria and avoiding impacts to sensitive resources. The Proposed Site Boundary Additions occur in general proximity to the routes approved in the Site Certificate and within the original ASC corridor selection assessments.<sup>1</sup>

OAR 345-021-0010(1)(b)(D)(i): Least disturbance to streams, rivers and wetlands during construction;

IPC has designed the Proposed Site Boundary Additions to avoid impacts to streams, rivers, and wetlands to the maximum extent practicable. Details on the occurrence of and impacts on Waters of this State are provided in Section 5.3 and Section 7.2.2 below.

OAR 345-021-0010(1)(b)(D)(ii): Least percentage of the total length of the pipeline or transmission line that would be located within areas of Habitat Category 1, as described by the Oregon Department of Fish and Wildlife;

The Proposed Site Boundary Additions will avoid all Category 1 habitat, as explained in Section 7.1.5 below.

OAR 345-021-0010(1)(b)(D)(iii): Greatest percentage of the total length of the pipeline or transmission line that would be located within or adjacent to public roads and existing pipeline or transmission line rights-of-way;

The Proposed Site Boundary Additions do not include co-locating with existing rights-of-way, because the changes are relatively short in length and because IPC was focused on addressing individual landowner concerns on their particular parcels and not on re-visiting project-wide efforts to co-locate.

OAR 345-021-0010(1)(b)(D)(iv): Least percentage of the total length of the pipeline or transmission line that would be located within lands that require zone changes, variances or exceptions:

The Proposed Site Boundary Additions minimize zoning changes, variances or exceptions, which are discussed in detail in Section 7.1.3 below.

OAR 345-021-0010(1)(b)(D)(v): Least percentage of the total length of the pipeline or transmission line that would be located in a protected area as described in OAR 345-022-0040;

<sup>&</sup>lt;sup>1</sup> See ASC, Exhibit B, and associated siting studies at Attachments B-1, B-2, B-3, B-4, and B-6.

The Proposed Site Boundary Additions will not be located in any protected areas, as discussed in more detail in Section 7.1.4 below.

OAR 345-021-0010(1)(b)(D)(vi): Least disturbance to areas where historical, cultural or archaeological resources are likely to exist;

The Proposed Site Boundary Additions will avoid impacts on historical, cultural, or archaeological resources to the maximum extent practicable, as discussed in more detail in Section 7.1.8 below.

OAR 345-021-0010(1)(b)(D)(vii): Greatest percentage of the total length of the pipeline or transmission line that would be located to avoid seismic, geological and soils hazards;

The Proposed Site Boundary Additions will avoid seismic, geological, and soils hazards, as discussed in more detail in Sections 7.1.1 and 7.1.2 below.

OAR 345-021-0010(1)(b)(D)(viii): Least percentage of the total length of the pipeline or transmission line that would be located within lands zoned for exclusive farm use;

The Proposed Site Boundary Additions will avoid lands zoned as exclusive farm use (EFU) where practicable, as discussed in more detail in Section 7.1.3.

# 5.1.2 Information Required for Transmission Line Projects – Length of Transmission Line

OAR 345-021-0010(1)(b)(E): If the proposed energy facility is a pipeline or transmission line or has, as a related or supporting facility, a transmission line or pipeline of any size:

(i) The length of the pipeline or transmission line;

. .

The length of the transmission line provided in the Proposed Site Boundary Additions is included in Table 4.1-1, totaling 7.2 miles of transmission line centerline.

# 5.2 Project Location

The Exhibit C provisions of OAR 345-021-0010(1)(c) require an applicant to provide certain information related to the project location. Idaho Power has identified below those subsections of that provision that may be required for the Council to make its findings on this RFA 1.

# 5.2.1 Maps of the Proposed Changes

OAR 345-021-0010(1)(c)(A): A map or maps showing the proposed locations of the energy facility site, all related or supporting facility sites and all areas that might be temporarily disturbed during construction of the facility in relation to major roads, water bodies, cities and towns, important landmarks and topographic features, using a scale of 1 inch = 2000 feet or smaller when necessary to show detail;

Figures 4-1 and 4-2 show the locations of the Proposed Site Boundary Additions and are organized by county, proceeding north to south showing the location of each proposed change. Each set of county maps includes series of detailed maps that are at a scale of 1 inch equals 1,000 feet. Project features shown include the site boundary, structure locations, and access

roads. Temporary project features are also shown, including structure work areas and pulling and tensioning sites.

# 5.2.2 Location Description

OAR 345-021-0010(1)(c)(B): A description of the location of the proposed energy facility site, the proposed site of each related or supporting facility and areas of temporary disturbance, including the total land area (in acres) within the proposed site boundary, the total area of permanent disturbance, and the total area of temporary disturbance. If a proposed pipeline or transmission line is to follow an existing road, pipeline or transmission line, the applicant must state to which side of the existing road, pipeline or transmission line the proposed facility will run, to the extent this is known; and

The Proposed Site Boundary Additions are on predominantly private lands in five counties in Oregon. Consistent with the ASC, IPC has prepared descriptions of the proposed changes by segment, with each segment summarizing the proposed changes at the county level. The Proposed Site Boundary Additions are described by number or amount of each major component and related and supporting facilities. Acreages of ground disturbance associated with those facilities is also described.

Forest-clearing activities associated with vegetation management in the right-of-way will occur in Umatilla and Union counties. The Proposed Site Boundary Additions do not include transmission line centerline changes in forested areas. To the extent that changes to roads involves forest clearing, those impacts will be inventoried and included in the Final Right-of-Way Clearing Assessment prior to construction and in accordance with OAR 345-025-0016 and in compliance with Site Certificate Condition GEN-LU-13.

# 5.2.3 Segment 1 – Morrow County

The Little Juniper Canyon Alternative is located between Little Juniper Lane and Bombing Range Road approximately 3 miles south of Naval Weapons Systems Training Facility – Boardman (NWSTF Boardman). The predominant land use at the Little Juniper Canyon Alternative is dryland agriculture (Figure 4-1, Map 1). Several proposed changes in Morrow County are associated with access road design updates along the Previously Approved Site Boundary. This includes roads in agricultural areas near NWSTF Boardman (Figure 4-2, Maps 1 to 2) and roads in rangeland areas near Butter Creek (Figure 4-2, Maps 3 to 4). Table 5.2-1 identifies the major components and related and supporting facilities associated with each of the site boundary changes in Morrow County. Table 5.2-2 summarizes the amount of ground disturbance associated with the proposed changes in Morrow County.

**Table 5.2-1. Summary of Proposed Changes – Morrow County** 

Project Features	Little Juniper Canyon Alternative	Access Road Changes	Total Number of Sites
Towers – Single Circuit 500-kV Lattice	4	-	4
Pulling and Tensioning Sites	2	-	2
Access Roads			Total Miles
Existing, 21-70% Improved	1.0	0.9	1.9
Existing, 71-100% Improved	-	-	-
New, Bladed	0.2	1.8	2.0
New, Overland	0.2	0.1	0.3
Crossings			Number of Crossings
High-Voltage Transmission Line Crossings <sup>1</sup>	-	-	0
Existing Road Crossings <sup>2</sup>	1	-	1
Existing Railroad Crossings <sup>3</sup>	-	-	0

<sup>&</sup>lt;sup>1</sup> Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV.

Table 5.2-2. Acres of Land Disturbed during Construction and Operation - Morrow County

	Land Affected During	Land Reclaimed After	Land Permanently Converted to
Proposed Changes/Project Component	Construction (acres)	Construction (acres)	Operations (acres)
Little Juniper Canyon Alternativ		(acres)	(acres)
Access Roads – New or Substantial Improvements	3.2	0.9	2.3
Structure and Other Work Areas	10.7	10.5	0.2
Subtotal	14.0	11.5	2.5
Access Road Changes			
Access Roads – New or Substantial Improvements	9.8	5.0	4.8
Subtotal	9.8	5.0	4.8
Morrow County – Total	23.8	16.4	7.3

Note: Acreages are rounded and may not sum exactly.

# 5.2.4 Segment 2 – Umatilla County

The Proposed Site Boundary Additions in Umatilla County are limited to access road design updates along the Previously Approved Site Boundary in open rangeland and forested areas (Figure 4-2, Maps 5 to 11). Table 5.2-3 identifies the major components and related and supporting facilities associated with each of the proposed changes in Umatilla County. Table 5.2-4 summarizes the amount of ground disturbance associated with the proposed changes in Umatilla County.

<sup>&</sup>lt;sup>2</sup> Source: U.S. Census (2020), primary and secondary highways.

<sup>&</sup>lt;sup>3</sup> Source: Oregon Department of Transportation (2014).

Table 5.2-3. Summary of Proposed Changes – Umatilla County

	_	
Project Features	Access Road Changes	Total Number of Sites
Towers – Single Circuit 500-kV Lattice	-	-
Pulling and Tensioning Sites	-	-
Access Roads		Total Miles
Existing, 21-70% Improved	1.4	1.4
Existing, 71-100% Improved	-	-
New, Bladed	2.0	2.0
New, Overland	-	-
Crossings		Total Crossings
High-Voltage Transmission Line Crossings <sup>1</sup>	<del>-</del>	-
Existing Road Crossings <sup>2</sup>	-	-
Existing Railroad Crossings <sup>3</sup>	-	-
1.6		

<sup>&</sup>lt;sup>1</sup> Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV.

Table 5.2-4. Acres of Land Disturbed during Construction and Operation – Umatilla County

Proposed Changes/Project Component	Land Affected During Construction (acres)	Land Reclaimed After Construction (acres)	Land Permanently Converted to Operations (acres)			
Approved Route Access Road Changes						
Access Roads – New or Substantial Improvements	11.1	5.5	5.6			
Subtotal	11.1	5.5	5.6			
Umatilla County – Total	11.1	5.5	5.6			

Note: Acreages are rounded and may not sum exactly

# 5.2.5 Segment 3 – Union County

The Proposed Site Boundary Additions in Union County are limited to access road design updates along the Previously Approved Site Boundary in open rangeland and forested areas (Figure 4-2, Maps 12 to 17). Table 5.2-5 identifies the major components and related and supporting facilities associated with each of the proposed changes in Union County. Table 5.2-6 summarizes the amount of ground disturbance associated with the proposed changes in Union County.

<sup>&</sup>lt;sup>2</sup> Source: U.S. Census (2020), primary and secondary highways.

<sup>&</sup>lt;sup>3</sup> Source: Oregon Department of Transportation (2014).

Table 5.2-5. Summary of Proposed Changes – Union County

Project Features	Access Road Changes	Total Number of Sites
Towers – Single Circuit 500-kV	-	-
Lattice		
Pulling and Tensioning Sites	-	-
Access Roads		Total Miles
Existing, 21-70% Improved	0.3	0.3
Existing, 71-100% Improved	0.1	0.1
New, Bladed	1.4	1.4
New, Overland	-	-
Crossings		Total Crossings
High-Voltage Transmission Line	-	-
Crossings <sup>1</sup>		
Existing Road Crossings <sup>2</sup>	0	0
Existing Railroad Crossings <sup>3</sup>	0	0

<sup>&</sup>lt;sup>1</sup> Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV.

Table 5.2-6. Acres of Land Disturbed during Construction and Operation – Union County

Proposed Changes/ Project Component	Land Affected During Construction (acres)	Land Reclaimed After Construction (acres)	Land Permanently Converted to Operations (acres)
Approved Route Access Road Changes			
Access Roads – New or Substantial Improvements	6.5	3.6	2.9
Subtotal	6.5	3.6	2.9
Union County – Total	6.5	3.6	2.9

Note: Acreages are rounded and may not sum exactly

# 5.2.6 Segment 4 – Baker County

The Proposed Site Boundary Additions in Baker County include two transmission line alternatives and proposed access road changes. The True Blue Gulch Alternative is approximately 4 miles southwest of Durkee and one mile south of the Burnt River Canyon in mountainous terrain (Figure 4-1, Maps 2 to 4). The True Blue Gulch Alternative includes a portion of Site Boundary that is larger than typical to allow for flexibility in the final design (Figure 4-1, Map 2). The Durbin Quarry Alternative is located on the west side Interstate 84 at Huntington in open rangeland (Figure 4-1, Maps 5 to 6). The proposed access road changes are predominantly in open rangeland settings in Baker County (Figure 4-2, Maps 18 to 27). Table 5.2-7 identifies the major components and related and supporting facilities associated with each of the proposed changes in Baker County. Table 5.2-8 summarizes the amount of ground disturbance associated with the proposed changes in Baker County.

<sup>&</sup>lt;sup>2</sup> Source: U.S. Census (2020), primary and secondary highways.

<sup>&</sup>lt;sup>3</sup> Source: Oregon Department of Transportation (2014).

Table 5.2-7. Summary of Proposed Changes – Baker County

Project Features	True Blue Gulch Alternative	Durbin Quarry Alternative	Access Road Changes	Number of Sites
Towers – Single Circuit 500-kV Lattice	14	10	-	24
Pulling and Tensioning Sites	4	4	-	8
Access Roads				Total Miles
Existing, 21-70% Improved	-	-	3.0	3.0
Existing, 71-100% Improved	4.7	-	1.8	6.5
New, Bladed	3.8	2.1	1.3	7.2
New, Overland	0.1	-	0.2	0.3
Crossings				Total Crossings
High-Voltage Transmission Line Crossings <sup>1</sup>	0	0		0
Existing Road Crossings <sup>2</sup>	0	0		0
Existing Railroad Crossings <sup>3</sup>	0	0		0

<sup>&</sup>lt;sup>1</sup> Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV.

Table 5.2-8. Acres of Land Disturbed during Construction and Operation – Baker County

Proposed Changes/ Project Component	Land Affected During Construction (acres)	Land Reclaimed After Construction (acres)	Land Permanently Converted to Operations (acres)
True Blue Gulch Alternative			
Access Roads – New or Substantial Improvements	33.1	18.7	14.5
Structure and Other Work Areas	37.6	37.0	0.7
Subtotal	70.8	55.6	15.1
Durbin Quarry Alternative	•		
Access Roads – New or Substantial Improvements	9.0	5.4	3.6
Structure and Other Work Areas	22.2	21.8	0.4
Subtotal	31.2	27.2	4.1
<b>Approved Route Access Road Change</b>	s		
Access Roads – New or Substantial Improvements	18.6	7.9	10.7
Subtotal	18.6	7.9	10.7
Baker County – Total	120.6	90.7	29.9

Note: Acreages are rounded and may not sum exactly.

Source: U.S. Census (2020), primary and secondary highways.
 Source: Oregon Department of Transportation (2014).

# 5.2.7 Segment 5 – Malheur County

The Proposed Site Boundary Additions in Malheur County are limited to access road changes in open rangeland (Figure 4-2, Maps 28 to 41). Table 5.2-9 identifies the major components and related and supporting facilities associated with each of the proposed changes in Malheur County. Table 5.2-10 summarizes the amount of ground disturbance associated with the proposed changes in Malheur County.

Table 5.2-9. Summary of Proposed Changes – Malheur County

	-	_
Project Features	Access Road Changes	Number of Sites
Towers – Single Circuit 500-kV	-	-
Lattice		
Pulling and Tensioning Sites	-	-
Access Roads		Total Miles
Existing, 21-70% Improved	1.9	1.9
Existing, 71-100% Improved	1.5	1.5
New, Bladed	3.7	3.7
New, Overland	0.3	0.3
Crossings		Total Crossings
High-Voltage Transmission Line	-	-
Crossings <sup>1</sup>		
Existing Road Crossings <sup>2</sup>	<u>-</u>	-
Existing Railroad Crossings <sup>3</sup>	-	-

<sup>&</sup>lt;sup>1</sup> Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV.

Table 5.2-10. Acres of Land Disturbed during Construction and Operation – Malheur County

Proposed Changes/Project Component	Land Affected During Construction (acres)	Land Reclaimed After Construction (acres)	Land Permanently Converted to Operations (acres)
Approved Route Access Road Chang	es		
Access Roads – New or Substantial Improvements	25.2	12.8	12.4
Subtotal	25.2	12.8	12.4
Malheur County – Total	25.2	12.8	12.4

Note: Acreages are rounded and may not sum exactly.

#### 5.3 Waters of this State

The Exhibit J requirements of OAR 345-021-0010(1)(j) require an applicant to provide certain information about impacts to Waters of this State. IPC has identified below those subsections of that provision that may be required for the Council to make its findings on this RFA 1.

<sup>&</sup>lt;sup>2</sup> Source: U.S. Census (2020), primary and secondary highways.

<sup>&</sup>lt;sup>3</sup> Source: Oregon Department of Transportation (2014).

# 5.3.1 Surveys and Removal-Fill Permitting

To identify any Waters of this State affected by the Proposed Site Boundary Additions, IPC applied the same methodology used in the ASC and approved by the Council in the Final Order. For those areas where IPC has completed on-the-ground wetland delineations and reporting (Phase 2 and Phase 3 in the ASC), IPC has incorporated the results in this RFA 1. For those areas where IPC has not had access or has not completed on-the-ground wetland delineations and reporting, IPC utilizes desktop data from the National Wetland Inventory (NWI), the National Hydrography Dataset (NHD), and aerial photo interpretation analysis (described as Phase 1 in the ASC). Per Site Certificate Condition PRE-RF-01, prior to construction, IPC will complete all necessary surveys and submit wetland delineation reports to the Oregon Department of Energy (ODOE) and Oregon Department of State Lands (ODSL) and receive a Letter of Concurrence from the ODSL.<sup>2</sup>

IPC will submit a final Joint Permit Application (JPA), including the final Compensatory Wetland and Non-Wetland Mitigation Plan, and Site Rehabilitation Plan. Impact quantities and compensatory mitigation required for the Project will be based on the results of the completion of field surveys and final impact calculations.

# 5.3.2 Description and Location of Waters of this State

OAR 345-021-0010(1)(j)(A): A description of all areas within the site boundary that might be waters of this state and a map showing the location of these features;

Wetlands and waters described in the section below are located within the Proposed Site Boundary Additions. Maps showing the location of waters of this state are included in Figure 5-1 and Figure 5-2. Surveys are ongoing and delineation reports will be prepared in support of the final JPA. Therefore, Figure 5-1 and Figure 5-2 include delineated wetlands and waters where surveys have been performed; where surveys have not been completed, IPC utilized NWI and NHD data to inform this RFA 1.

### 5.3.3 Impacts to Waters of this State

OAR 345-021-0010(1)(j)(B): An analysis of whether construction or operation of the proposed facility would adversely affect any waters of this state;

Wetland and water delineation surveys in the RFA 1 areas are not yet complete and so NWI and NHD data were used to determine impacts in areas where access has not yet been obtained. Similarly, data about the width of the waterways is unavailable as of this RFA 1 and so the calculation for potential impacts is given in linear feet instead of acres. The estimated impacts on waters of this state are provided in Table 5.3-1.

The certificate holder shall:

<sup>&</sup>lt;sup>2</sup> Site Certificate Condition PRE-RF-01 provides:

a. Prior to construction of a phase or segment of the facility, submit updated electronic wetland delineation report(s) to the Department and to the Oregon Department of State Lands. All wetland delineation report(s) submitted to the Oregon Department of State Lands shall follow its submission and review procedures.

b. Prior to construction of a phase or segment of the facility, the Department must receive a Letter of Concurrence issued by the Oregon Department of State Lands referencing the applicable wetland delineation for the phase or segment of the facility.

Table 5.3-1. Estimated Temporary and Permanent Impacts on Waters of this State for RFA 1

County/	Tempora	ary Impacts	Perman	ent Impacts
RFA 1 Alternative	Acres <sup>1</sup>	Feet <sup>2</sup>	Acres <sup>1</sup>	Feet <sup>2</sup>
Little Juniper Canyon Alternative		450.14		15.24
True Blue Gulch Alternative	0.48	1,103.62	0.23	278.91
Durbin Quarry (ODOT) Alternative		971.32		
Approved Route Access Road Changes	0.12	1,088.51	0.11	704.78
Total	0.60	3,613.59	0.34	998.93

<sup>&</sup>lt;sup>1</sup> Impact acres pertain to field delineated wetlands and mapped NWI wetlands in Alternative areas where Project disturbance activities intersect wetlands. NWI mapping was used for impact calculations in Alternative areas that have not been ground surveyed yet. Once wetland surveys are completed, and mapped NWI wetland sites have been field surveyed, it is likely the total NWI wetland impacts will be lower that estimated.

# 5.3.4 Description of Significance of Impacts to Waters of this State

OAR 345-021-0010(1)(j)(C): A description of the significance of potential adverse impacts to each feature identified in (A), including the nature and amount of material the applicant would remove from or place in the waters analyzed in (B);

For many waters of this state, a Removal-Fill Authorization is required if a project will involve 50 cubic yards of fill and/or removal (cumulative) within the jurisdictional boundary. For activities in Essential Salmonid Habitat (ESH) streams, State Scenic Waterways and compensatory mitigation sites, a permit is required for any amount of removal or fill.

The impacts described in Section 5.3.3 are the result of temporary and permanent access roads as well as temporary work areas.

#### 5.3.5 Why Removal-Fill Authorization is Not Needed

OAR 345-021-0010(1)(j)(D): If the proposed facility would not need a removal-fill authorization, an explanation of why no such authorization is required for the construction and operation of the proposed facility.

OAR 345-021-0010(1)(j)(D) requires an explanation if a removal-fill authorization (Removal-Fill Permit) is not needed. Here, because the Project will require a Removal-Fill Permit, OAR 345-021-0010(1)(j)(D) does not apply. See Section 7.2.2 for further information on the Removal-Fill Permit.

<sup>&</sup>lt;sup>2</sup> Impacts displayed in feet pertain to field delineated intermittent and perennial streams and mapped NHD streams in Alternative areas where Project ground disturbance activities intersect streams. Once wetland surveys are completed, it is likely that many NHD streams will be considered ephemeral; therefore, not waters of the state, thereby reducing the total regulated stream impacts.

# 5.3.6 Information to Support Removal-Fill Authorization

OAR 345-021-0010(1)(j)(E): If the proposed facility would need a removal-fill authorization, information to support a determination by the Council that the Oregon Department of State Lands should issue a removal-fill permit, including information in the form required by the Department of State Lands under OAR Chapter 141 Division 85.

Section 7.2.2 below discusses the application submission requirements and agency review standards relevant to a Removal-Fill Permit application.

### 6.0 PROPOSED CHANGES TO SITE CERTIFICATE

OAR 345-027-0360(1)(d): The specific language of the site certificate, including conditions, that the certificate holder proposes to change, add, or delete through the amendment;

Attachment 6-1 includes the red-lined Site Certificate, which reflects the proposed changes of RFA 1. Specific amendments include the following:

Adding language to a general standard of review condition to expand the facility description to include any modifications approved during the site certificate amendment process.

Site Certificate Condition GEN-GS-06: Subject to conditions of the site certificate, the, certificate holder may construct the facility anywhere within the site boundary (approved corridor(s)), and as described in ASC Exhibit B and represented in ASC Exhibit C Attachment C-2 and C-3 mapsets and Amendment 1 mapsets. The approved corridors include:

- a. The transmission line route extending approximately 273-miles through Morrow, Umatilla, Union, Baker, and Malheur counties;
- b. West of Bombing Range Road alternative 1 and the west of Bombing Range Roadalternative 2 in Morrow County;
- c. Morgan Lake alternative in Union County; and
- d. Double Mountain alternative in Malheur County-; and
- e. Amendment 1 site boundary changes.

# 7.0 APPLICABLE STATUTES, RULES, STANDARDS, AND ORDINANCES

OAR 345-027-0360(1)(e): A list of all Council standards and other laws, including statutes, rules and ordinances, applicable to the proposed change, and an analysis of whether the facility, with the proposed change, would comply with those applicable laws and Council standards. For the purpose of this rule, a law or Council standard is "applicable" if the Council would apply or consider the law or Council standard under OAR 345-027-0375(2); and

OAR 345-027-0360(1)(e) requires a list of all applicable Council standards, laws, rules, and ordinances. For this RFA 1, which involves adding new area to the site boundary, the Council must determine that proposed changes comply with all Council standards, laws, rules, and

ordinances applicable to the original Site Certificate and that the amount of the bond or letter of credit in the Site Certificate is adequate.<sup>3</sup>

Table 7-1 lists the Council standards, laws, rules, and ordinances applicable to the original Site Certificate; addresses the RFA 1 compliance with the same; and lists the relevant Site Certificate conditions.

To issue an amended site certificate, the Council must determine that the preponderance of evidence on the record supports the following conclusions:

<sup>&</sup>lt;sup>3</sup> OAR 345-027-0375(2) provides, in relevant part:

<sup>(</sup>a) For a request for amendment proposing to add new area to the site boundary, the portion of the facility within the area added to the site by the amendment complies with all laws and Council standards applicable to an original site certificate application;

<sup>(</sup>d) For all requests for amendment, the amount of the bond or letter of credit required under OAR 345-022-0050 is adequate.

**Table 7-1. Standards and Laws Relevant to Proposed Amendment** 

Standard or Other Permit	Compliance	Related Site Certificate Conditions
OAR 345-022-0000 General Standard of Review	The General Standard of Review requires compliance with the EFSC Statutes and Standards. As demonstrated in the remainder of this Table 7-1 and elsewhere in the findings, analysis, and conclusions within this RFA 1, IPC demonstrates the Proposed Site Boundary Additions comply with all applicable EFSC Statutes and Standards and, by extension, OAR 345-022-0000.  • IPC does not specifically address the General Standard of Review in more detail in this RFA 1. Instead, the applicable EFSC Statutes and Standards are addressed throughout this RFA 1 in the context of the relevant statutes, rules, standards, and ordinances.  • In relation to this standard, IPC is proposing an amendment to Site Certificate Condition GEN-GS-06.	GEN-GS-01 Construction deadlines GEN-GS-02 Pre-construction compliance CON-GS-01 Semi-annual construction reporting OPR-GS-01 Annual operation reporting OPR-GS-02 Legal description GEN-GS-03 Compliance during all phases CON-GS-02 Construction in one area while route changes elsewhere GEN-GS-04 Notification of environmental impacts OPR-GS-03 Implementation of the Reclamation and Revegetation Plan GEN-GS-05 Transfer of ownership GEN-GS-06 Construction within the site boundary
OAR 345-022-0010 Organizational Expertise	The Organizational Expertise Standard requires that the applicant have the organizational expertise to construct, operate, and retire the facility in compliance with Council standards and site certificate conditions.  Because RFA 1 does not propose any changes that would affect IPC's organizational expertise, or that would introduce any new Project components or related or supporting facilities requiring new types of organizational expertise, the Council's existing findings, analysis, and conclusions in the Final Order regarding organizational expertise and the related Site Certificate conditions are adequate to ensure the Proposed Site Boundary Additions comply with OAR 345-022-0010.  • IPC does not address this standard in more detail in this RFA 1.  • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	OPR-OE-01 Submission of inspection documentation with annual reporting GEN-OE-01 Notification of qualifications and contractor identity changes PRE-OE-01 Notification of contractor identities PRE-OE-02 Assurance of contractor compliance PRE-OE-03 Submission of third-party permit list and permits GEN-OE-02 Issuance of notice of violation GEN-OE-03 Reporting of Site Certificate violations
OAR 345-022-0020 Structural Standard	The Structural Standard requires that the applicant adequately characterize and address potential seismic hazards. As discussed in Section 7.1.1 below, for the Proposed Site Boundary Additions, IPC has adequately characterized the potential seismic hazards and will further refine that characterization prior to construction consistent with the existing Site Certificate conditions. Moreover, IPC demonstrates that the existing Site Certificate conditions requiring IPC to avoid, minimize, and mitigate seismic hazard risks will adequately address any potential seismic hazards related to the Proposed Site Boundary Additions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the Proposed Site Boundary Additions, subject to the related Site Certificate conditions, comply with OAR 345-022-0020.  • IPC addresses this standard in more detail in Section 7.1.1 below. • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	PRE-SS-01 Submission of geological and geotechnical investigation plan and report GEN-SS-01 Compliance of building codes GEN-SS-02 Avoidance of seismic hazards GEN-SS-03 Notification of foundation changes GEN-SS-04 Notification of other geological observations

Standard or Other Permit  OAR 345-022-0022 Soil Protection	Compliance  The Soil Protection Standard requires that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in a significant adverse impact to soils. As discussed in Section 7.1.2 below, for the Proposed Site Boundary Additions, IPC has adequately characterized the potential soil impacts, and IPC demonstrates that the existing Site Certificate conditions requiring IPC to avoid, minimize, and mitigate soil impacts will adequately address any potential soil impacts related to the Proposed Site Boundary Additions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, comply with OAR 345-022-0022.	Related Site Certificate Conditions  GEN-SP-01 Implementation of National Pollutant Discharge Elimination System (NPDES) 1200-C and Erosion Sediment Control Plan GEN-SP-02 Implementation of Construction Spill Prevention Control and Countermeasures (SPCC) Plan GEN-SP-03 Implementation of Operations SPCC Plan GEN-SP-04 Implementation of final Blasting Plan OPR-SP-01 Inspection of facility components and mitigation for soil impacts
OAR 345-022-0030 Land Use	<ul> <li>IPC addresses this standard in more detail in Section 7.1.2 below.</li> <li>In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.</li> <li>The Land Use Standard requires that the facility complies with the statewide planning goals. As discussed in Section 7.1.3 below, IPC demonstrates that the Proposed Site Boundary Additions comply with local applicable substantive criteria, Land Conservation and Development Commission rules and goals, and any land use statutes directly applicable to the facility. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the Proposed Site Boundary Additions, subject to the related Site Certificate conditions, comply with OAR 345-022-0030.</li> <li>IPC addresses this standard in more detail in Section 7.1.3 below.</li> <li>In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	GEN-LU-01 Submission of Morrow County permits, aggregate supplier identities, and riparian impact consultation GEN-LU-02 Adherence to Morrow County setback requirements GEN-LU-03 Submission of Umatilla County permits and Air Contaminant Permit PRE-LU-01 Road construction consultation with Umatilla County Public Works GEN-LU-04 Adherence to Umatilla County setback requirements GEN-LU-05 Submission of Union County permits GEN-LU-06 Adherence to Union County setback requirements PRE-LU-02 Submission of aggregate supplier identities to Baker County GEN-LU-07 Submission of Baker County permits CON-LU-01 Adherence to Baker County setback requirements GEN-LU-08 Submission of Malheur County permits GEN-LU-09 Adherence to Malheur County setback requirements GEN-LU-10 Adherence to City of North Powder setback requirements GEN-LU-11 Implementation of final Agricultural Assessment and Mitigation Plan GEN-LU-13 Implementation of final Right-of-Way Clearing Assessment CON-LU-02 Submission of Memorandum of Agreement with City of LaGrande for Morgan Lake Park improvements

Standard or Other Permit	Compliance	Related Site Certificate Conditions
OAR 345-022-0040 Protected Areas	The Protected Area Standard requires that the facility avoid certain protected areas, except in certain situations, and that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in a significant adverse impact to protected areas. As discussed in Section 7.1.4 below, IPC demonstrates that the Proposed Site Boundary Additions will not be located in a designated protected area and will not otherwise significantly adversely impact any such protected areas. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the Proposed Site Boundary Additions, subject to the related Site Certificate conditions, comply with OAR 345-022-0040.  • IPC addresses this standard in more detail in Section 7.1.4 below. • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	GEN-PA-01 Implementation of protection measures for the Ladd March Wildlife Area GEN-PA-02 Avoidance of Ladd Marsh Wildlife Area if Morgan Lake alternative route chosen
OAR 345-022-0050 Retirement and Financial Assurance	The Retirement and Financial Assurance Standard requires that the site, taking into account mitigation, can be restored, and that the applicant has a reasonable likelihood of obtaining a bond or letter of credit to fund that restoration. Because RFA 1 does not propose any changes that would affect a potential site restoration or IPC's ability to fund that restoration, the Council's existing findings, analysis, and conclusions in its final order regarding retirement and financial assurance and the related Site Certificate conditions are adequate to ensure the Proposed Site Boundary Additions comply with OAR 345-022-0050.  • IPC does not address this standard in more detail in this RFA 1.  • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	GEN-RT-01 Prevention of hazardous site conditions RET-RT-01 Retirement of facility in compliance with the Retirement Plan RET-RT-02 Retirement of facility upon permanent cessation PRE-RT-01 Adjustment of bond or letter of credit during construction OPR-RT-01 Submission and maintenance of bond or letter of credit during operations

Standard or Other Dermit	Compliance	Dolotod Sito Contificate Canditions
Standard or Other Permit  OAR 345-022-0060 Fish and Wildlife Habitat	Compliance  The Fish and Wildlife Habitat Standard requires that the design, construction and operation of the facility, taking into account mitigation, are consistent with ODFW's fish and wildlife habitat mitigation goals and standards and with the Greater Sage-Grouse Conservation Strategy for Oregon. As discussed in Section 7.1.5 below, for the Proposed Site Boundary Additions, IPC has adequately characterized the potential fish and wildlife habitat impacts, and IPC demonstrates that the existing Site Certificate conditions requiring IPC to avoid, minimize, and mitigate fish and wildlife impacts will adequately address any fish and wildlife habitat impacts related to the Proposed Site Boundary Additions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the Proposed Site Boundary Additions, subject to the related Site Certificate conditions, comply with OAR 345-022-0060.  • IPC addresses this standard in more detail in Section 7.1.5 below. • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	Related Site Certificate Conditions  GEN-FW-01 Implementation of final Reclamation and Revegetation Plan GEN-FW-02 Implementation of final Vegetation Management Plan GEN-FW-03 Implementation of final Noxious Weed Plan GEN-FW-04 Implementation of final Habitat Mitigation Plan GEN-FW-05 Implementation of worker environmental awareness training GEN-FW-06 Flagging of environmentally sensitive areas GEN-FW-07 Speed limit enforcement GEN-FW-08 Adherence with the Avian Protection Plan and fatality reporting PRE-FW-01 Preconstruction surveys to be completed on unsurveyed portions of the site boundary. PRE-FW-02 Preconstruction surveys to be completed on entirety of site boundary PRE-FW-03 Submission of final Sage-Grouse Habitat Mitigation Plan PRE-FW-04 Perform preconstruction traffic study in elk habitat and sage-grouse habitat CON-FW-01 Avoidance of elk or mule deer winter range during temporal restriction CON-FW-02 Notification of pygmy rabbit colonies or State Sensitive bat species CON-FW-03 Conduct construction avian surveys during migratory bird nesting season CON-FW-04 Avoidance of raptor nests within buffers and temporal restrictions CON-FW-05 Implementation of final Sage-Grouse Habitat Mitigation Plan CON-FW-06 Avoidance of sage-grouse habitat during temporal restriction OPR-FW-01 Adherence with final compensatory mitigation calculations OPR-FW-03 Submission of traffic studies data for indirect sage-grouse habitat impact calculations OPR-FW-04 Perform operations traffic study in elk habitat and sage-grouse habitat

Standard or Other Permit	Compliance	Related Site Certificate Conditions
OAR 345-022-0070 Threatened and Endangered Species	The Threatened and Endangered Species Standard requires that the design, construction and operation of the facility, taking into account mitigation, adequately address potential impacts to state-designated threatened and endangered species. As discussed in Section 7.1.6 below, for the Proposed Site Boundary Additions, IPC has adequately characterized the potential impacts to such species, and IPC demonstrates that the existing Site Certificate conditions requiring IPC to avoid, minimize, and mitigate impacts to threatened and endangered species will adequately address any impacts to such species related to the Proposed Site Boundary Additions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the Proposed Site Boundary Additions, subject to the related Site Certificate conditions, comply with OAR 345-022-0070.  • IPC addresses this standard in more detail in Section 7.1.6 below.  • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	CON-TE-01 Avoidance of Category 1 Washington ground squirrel habitat CON-TE-02 Avoidance of threatened or endangered plant species within buffers
OAR 345-022-0080 Scenic Resources	The Scenic Resources Standard requires that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impacts to certain scenic resources. As discussed in Section 7.1.7 below, for the Proposed Site Boundary Additions, IPC has adequately characterized the potential impacts to scenic resources, and IPC demonstrates that the existing Site Certificate conditions requiring IPC to avoid, minimize, and mitigate impacts to certain scenic resources will adequately address any impacts to such resources related to the Proposed Site Boundary Additions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the Proposed Site Boundary Additions, subject to the related Site Certificate conditions, comply with OAR 345-022-0080.  • IPC addresses this standard in more detail in Section 7.1.7 below. • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	GEN-PA-02 Avoidance of Ladd Marsh Wildlife Area if Morgan Lake alternative route is chosen GEN-SR-01 Usage of dull-galvanized steel for lattice towers and non-specular conductors GEN-SR-02 Union County visual impact reduction GEN-SR-03 Reduction of National Historic Oregon Trail Interpretive Center visual impacts GEN-SR-04 Reduction of Birch Creek Area of Critical Environmental Concern visual impacts

Standard or Other Permit	Compliance	Related Site Certificate Conditions
OAR 345-022-0090 Historic, Cultural and Archaeological Resources	The Historic, Cultural and Archaeological Resources Standard requires that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in a significant adverse impact to certain historic, cultural and archaeological resources. As discussed in Section 7.1.8 below, for the Proposed Site Boundary Additions, IPC has adequately characterized the potential impacts to historic, cultural and archaeological resources, and IPC demonstrates that the existing Site Certificate conditions requiring IPC to avoid, minimize, and mitigate impacts will adequately address any potential impacts to such resources related to the Proposed Site Boundary Additions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the Proposed Site Boundary Additions, subject to the related Site Certificate conditions, comply with OAR 345-022-0090.  • IPC addresses this standard in more detail in Section 7.1.8 below. • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	GEN-HC-01 Avoidance of Oregon Trail/National Historic Trail resources GEN-HC-02 Implementation of final HPMP OPS-HC-01 Submission of Cultural Resources Technical Report
OAR 345-022-0100 Recreation	The Recreation Standard requires that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities. As discussed in Section 7.1.9 below, for the Proposed Site Boundary Additions, IPC has adequately characterized the potential impacts to important recreational opportunities, and IPC demonstrates that the Proposed Site Boundary Additions will not result in any significant impacts to such opportunities. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the Proposed Site Boundary Additions, subject to the related Site Certificate conditions, comply with OAR 345-022-0100.  • IPC addresses this standard in more detail in Section 7.1.9 below. • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	GEN-RC-01 Reduction of Morgan Lake Park visual impacts

Standard or Other Permit	Compliance	Related Site Certificate Conditions
OAR 345-022-0110 Public Services	The Public Services Standard requires that the construction and operation of the facility, taking into account mitigation, are not likely to result in a significant adverse impact to the ability of providers to provide public services. Because RFA 1 does not propose any changes that would affect public service providers differently, or that would introduce any new Project components or related or supporting facilities requiring new types of public service providers, the Council's existing findings, analysis, and conclusions in its final order regarding public service providers and the related Site Certificate conditions are adequate to ensure the Proposed Site Boundary Additions comply with OAR 345-022-0110.  • IPC does not address this standard in more detail in this RFA 1.  • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	GEN-PS-01 Submit Helicopter Use Plan GEN-PS-02 Submit Final Fire Prevention and Suppression Plan GEN-PS-03 Submit Wildfire Mitigation Plan PRE-PS-01 Consultation with Owyhee Irrigation District PRE-PS-02 Submit county-specific Transportation and Traffic Plan PRE-PS-03 Submit FAA form 7460-1 Notice of Proposed Construction or Alteration PRE-PS-04 Implementation of Environmental and Safety Training Plan
OAR 345-022-0120 Waste Minimization	The Waste Minimization Standard requires that, to the extent reasonably practicable, the plans for the construction and operation of the facility are likely to minimize the generation of waste, and the management of waste is likely to result in minimal adverse impacts to the surrounding and adjacent areas. Because RFA 1 does not propose any changes that would affect Idaho Power's waste minimization plans, or that would introduce any new types of waste, the Council's existing findings, analysis, and conclusions in its final order regarding waste minimization and the related Site Certificate conditions are adequate to ensure the Proposed Site Boundary Additions comply with OAR 345-022-0120.  • IPC does not address this standard in more detail in this RFA 1.  • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	GEN-WM-01 Implementation of Construction Waste Management Plan
OAR 345-023-0005 Need	The Need Standard requires that the applicant demonstrate the need for the Project either through the least-cost plan rule or system reliability rule. Because RFA 1 does not propose any changes that would affect the consideration of the Project under IPC's Integrated Resource Plan, or that would impact the need of the Project to enable IPC's transmission system, the Council's existing findings, analysis, and conclusions in its final order regarding the need for the Project are adequate to ensure the Proposed Site Boundary Additions comply with OAR 345-023-0005.  • IPC does not address this standard in more detail in this RFA 1.  • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	

Standard or Other Permit	Compliance	Related Site Certificate Conditions
OAR 345-024-0090 Transmission Lines	The Sitting Standards for Transmission Lines require that the design, construction and operation of the facility meet certain alternating current operating criteria and minimize induced currents. Because RFA 1 does not propose any changes that would affect the alternating current electric fields or induced currents, the Council's existing findings, analysis, and conclusions in its final order regarding alternating current and induced current, and the related Site Certificate conditions, are adequate to ensure the Proposed Site Boundary Additions comply with OAR 345-024-0090.  • IPC does not address this standard in more detail in this RFA 1.  • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	GEN-TL-01 Management of electromagnetic field exposure OPR-TL-01 Reduction of induced current and nuisance shock risks GEN-TL-02 Adherence with the National Electrical Safety Code and grounding practices PRE-TL-01 Meeting with Public Utility Commission (OPUC) OPR-TL-02 Submission of compliance updates to OPUC
OAR 340-035-0035 Noise Control Regulations	The Noise Control Regulations require that the construction and operation of the facility meet certain noise standards. As discussed in Section 7.2.1 below, for the proposed changes, IPC has adequately characterized the potential noise impacts, and IPC demonstrates that the existing Site Certificate conditions requiring IPC to avoid, minimize, and mitigate impacts will adequately address any such potential impacts related to the Proposed Site Boundary Additions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the Proposed Site Boundary Additions, subject to the related Site Certificate conditions, comply with OAR 340-035-0035.  • IPC addresses this standard in more detail in Section 7.2.1 below. • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	GEN-NC-01 Implementation of Noise Exceedance Mitigation Plans GEN-NC-02 Implementation of a noise complaint response system CON-NC-01 Implementation of design measures and construction techniques OPR-NC-01 Adherence to the ambient antidegradation standard during infrequent or unusual foul weather events OPR-NC-02 Variance to compliance with the ambient antidegradation standard
Removal-Fill Permit OAR Chapter 141, Division 85	The Removal-Fill Rules require a permit from the Department of State Lands to remove material from, or to fill in, waters of the state. As discussed in Section 7.2.2 below, for the proposed changes, IPC has characterized the potential impacts to Waters of this State, and the existing Site Certificate conditions requiring IPC to obtain a permit and avoid, minimize, and mitigate impacts will adequately address any such potential impacts related to the Proposed Site Boundary Additions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the Proposed Site Boundary Additions, subject to the related Site Certificate conditions, comply with the Removal-Fill Regulations.  • IPC addresses this standard in more detail in Section 7.2.2 below.  • In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.	PRE-RF-01 Submission of updated wetland delineation reports GEN-RF-01 Implementation of final Site Rehabilitation Plan GEN-RF-02 Implementation of final Compensatory Wetland and Non-Wetland Mitigation Plan PRE-RF-02 Provide copy of Joint Permit Application GEN-RF-03 Compliance with General and Special Conditions GEN-RF-04 Compliance with Removal-Fill Conditions and procedures

Standard or Other Permit	Compliance	Related Site Certificate Conditions
Fish Passage Plan Approval OAR Chapter 635, Division 412	The Fish Passage Rules require approval of fish passage plans for any new artificial obstructions, or substantial modifications to existing obstructions, affecting native fish streams. As part of the Proposed Site Boundary Additions, IPC is not proposing any new artificial obstructions, or substantial modifications to existing obstructions, on any waters. Therefore, the Council's existing findings, analysis, and conclusions in its final order regarding fish passage, and the related Site Certificate conditions, are adequate to ensure the Proposed Site Boundary Additions comply with the Fish Passage Rules.	GEN-FP-01 Implementation of final Fish Passage Plan
	<ul> <li>IPC does not address this standard in more detail in this RFA 1.</li> <li>In relation to this standard, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	
Public Land Action Permit	None of the proposed changes in RFA 1 occur on non-federal public lands, and therefore, no Public Land Action Permit is required.	N/A
Morrow County Land Use Permit – Land Use Decision (Utility Facility; EFU Zone)	In Morrow County, all of the proposed site boundary changes in RFA 1 occur in the EFU zone. As discussed in Section 7.1.3 below, the Proposed Site Boundary Additions will comply with the relevant county code provisions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, comply with the Morrow County EFU Zone requirements.	GEN-LU-01 Submission of Morrow County permits, aggregate supplier identities, and riparian impact consultation
	<ul> <li>IPC addresses the Morrow County EFU Zone requirements in more detail in Section 7.1.3.1 below.</li> <li>In relation to the Morrow County EFU Zone requirements, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	
Morrow County Land Use Permit – Zoning Permit (Utility Facility; General Industrial Zone)	None of the Proposed Site Boundary Additions occur in the Morrow County General Industrial zone.	GEN-LU-01 Submission of Morrow County permits, aggregate supplier identities, and riparian impact consultation
Morrow County Land Use Permit – Zoning Permit (Utility Facility; Port Industrial Zone)	None of the Proposed Site Boundary Additions occur in the Morrow County Port Industrial zone.	N/A

Standard or Other Permit	Compliance	Related Site Certificate Conditions
Umatilla County Land Use Permit – Land Use Decision and Zoning Permit (Utility Facility; EFU Zone)	In Umatilla County, portions of the Proposed Site Boundary Additions occur in the EFU zone. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 will comply with the relevant county code provisions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, comply with the Umatilla County EFU Zone requirements.	GEN-LU-03 Submission of Umatilla County permits and Air Containment Permit
	<ul> <li>IPC addresses the Umatilla County EFU Zone requirements in more detail in Section 7.1.3 below.</li> <li>In relation to the Umatilla County EFU Zone requirements, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	
Umatilla County Land Use Permit – Conditional Use Permit (Helipads; EFU Zone)	None of the Proposed Site Boundary Additions involve helipads.	GEN-LU-03 Submission of Umatilla County permits and Air Containment Permit
Umatilla County Land Use Permit – Conditional Use Permit and Land Use Decision (Utility Facility; Grazing-Farm Zone/Goal 4 Forestlands)	In Umatilla County, portions of the transmission line Proposed Site Boundary Additions occur in the Grazing Farm zone. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 will comply with the relevant county code provisions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, comply with the Umatilla County Grazing-Farm Zone requirements.	GEN-LU-03 Submission of Umatilla County permits and Air Containment Permit GEN-LU-12 Limitations of right-of-way within Goal 4 forest lands
	<ul> <li>IPC addresses the Umatilla County Grazing-Farm Zone requirements in more detail in Section 7.1.3 below.</li> <li>In relation to the Umatilla County Grazing-Farm Zone requirements, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	
Umatilla County Land Use Permit – Exception to Goal 4 (Access Roads; Helipads; Grazing-Farm Zone/Goal 4 Forestlands)	In Umatilla County, certain access roads in Proposed Site Boundary Additions occur in the Grazing-Farm zone and Goal 4 forest lands. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 support a Goal 4 exception, if the Council deems necessary. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, warrant a Goal 4 exception in the Umatilla County Grazing-Farm Zone.	GEN-LU-03 Submission of Umatilla County permits and Air Containment Permit GEN-LU-12 Limitations of right-of-way within Goal 4 forest lands
	<ul> <li>IPC addresses the Umatilla County Grazing-Farm Zone Goal 4 exception requirements in more detail in Section 7.1.3 below.</li> <li>In relation to the Umatilla County Grazing-Farm Zone Goal 4 exception requirements, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	
Umatilla County Land Use Permit – Conditional Use Permit and Land Use Decision (Helipads; Grazing-Farm Zone)	None of the Proposed Site Boundary Additions involve helipads.	GEN-LU-03 Submission of Umatilla County permits and Air Containment Permit

Standard or Other Permit	Compliance	Related Site Certificate Conditions
Umatilla County Land Use Permit – Conditional Use Permit (Access Roads; Grazing-Farm Zone)	In Umatilla County, portions of the access road Proposed Site Boundary Additions occur in the Grazing Farm zone. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 will comply with the relevant county code provisions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, comply with the Umatilla County Grazing-Farm Zone requirements.  • IPC addresses the Umatilla County Grazing-Farm Zone requirements in more detail in Section 7.1.3 below.	GEN-LU-03 Submission of Umatilla County permits and Air Containment Permit
	In relation to the Umatilla County Grazing-Farm Zone requirements, IPC is not proposing any new conditions or changes to existing conditions.	
Umatilla County Land Use Permit – Conditional Use Permit (Utility Facility; Light Industrial Zone)	None of the Proposed Site Boundary Additions occur in the Umatilla County Light Industrial zone.	GEN-LU-03 Submission of Umatilla County permits and Air Containment Permit
Umatilla County Land Use Permit – Conditional Use Permit (Batch Plant; Light Industrial Zone)	None of the Proposed Site Boundary Additions occur in the Umatilla County Light Industrial zone.	GEN-LU-03 Submission of Umatilla County permits and Air Containment Permit
Umatilla County Land Use Permit – Conditional Use Permit (Multi-Use Area; Rural Tourist Commercial Zone)	None of the Proposed Site Boundary Additions occur in the Umatilla County Rural Tourist Commercial zone.	GEN-LU-03 Submission of Umatilla County permits and Air Containment Permit
Union County Land Use Permit – Land Use Decision (Utility Facility; EFU Zone)	None of the Proposed Site Boundary Additions occur in the Union County EFU zone.	GEN-LU-05 Submission of Union County permits
Union County Land Use Permit – Conditional Use Permit and Land Use Decision (Helipads; EFU Zone)	None of the Proposed Site Boundary Additions involve helipads.	GEN-LU-05 Submission of Union County permits
Union County Land Use Permit – Conditional Use Permit and Land Use Decision (Concrete Batch Plants; EFU Zone)	None of the Proposed Site Boundary Additions involve concrete batch plants.	GEN-LU-05 Submission of Union County permits
Union County Land Use Permit – Land Use Decision (Utility Facility; Agriculture-Grazing Zone)	In Union County, portions of the Proposed Site Boundary Additions occur in the Agriculture-Grazing zone. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 will comply with the relevant county code provisions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, comply with the Union County Agriculture-Grazing Zone requirements.	GEN-LU-05 Submission of Union County permits
	<ul> <li>IPC addresses the Union County Agriculture-Grazing Zone requirements in more detail in Section 7.1.3 below.</li> <li>In relation to the Union County Agriculture-Grazing Zone requirements, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	

Standard or Other Permit	Compliance	Related Site Certificate Conditions
Union County Land Use Permit – Land Use Decision (Predominant Use Determination; Timber-Grazing Zone)	In Union County, portions of the Proposed Site Boundary Additions occur in the Timber-Grazing zone. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 will comply with the relevant county code provisions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, comply with the Union County Timber-Grazing Zone requirements.	GEN-LU-05 Submission of Union County permits
	<ul> <li>IPC addresses the Union County Timber-Grazing Zone requirements in more detail in Section 7.1.3.3 below.</li> <li>In relation to the Union County Timber-Grazing Zone requirements, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	
Union County Land Use Permit – Land Use Decision (Utility Facility; Timber-Grazing Zone, Predominantly Farmland Parcels)	In Union County, portions of the Proposed Site Boundary Additions occur in the Timber-Grazing zone, predominantly farmland parcels. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 will comply with the relevant county code provisions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, comply with the Union County Timber-Grazing Zone, predominantly farmland, requirements.  • IPC addresses the Union County Timber-Grazing Zone, predominantly farmland, requirements in more detail in Section 7.1.3.3 below.  • In relation to the Union County Timber-Grazing Zone, predominantly farmland, requirements IPC is not preposing any	GEN-LU-05 Submission of Union County permits
Union County Land Use Permit – Conditional Use Permit (Utility Facility; Timber-Grazing Zone, Predominantly Forestland Parcels)	predominantly farmland, requirements, IPC is not proposing any new conditions or changes to existing conditions.  In Union County, portions of the Proposed Site Boundary Additions occur in the Union County Timber-Grazing zone, predominantly forestland parcels. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 will comply with the relevant county code provisions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, comply with the Union County Timber-Grazing Zone, predominantly forestland, requirements.  • IPC addresses the Union County Timber-Grazing Zone,	GEN-LU-05 Submission of Union County permits
	<ul> <li>predominantly forestland, requirements in more detail in Section 7.1.3 below.</li> <li>In relation to the Union County Timber-Grazing Zone, predominantly forestland, requirements, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	

Standard or Other Permit	Compliance	Related Site Certificate Conditions
Union County Land Use Permit – Exception to Goal 4 (Transmission Line Right-of-Way Width; Timber-Grazing Zone, Predominantly Forestland Parcels)	<ul> <li>In Union County, portions of the Proposed Site Boundary Additions occur in the Timber-Grazing zone and Goal 4 forest lands. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 support a Goal 4 exception, if the Council deems necessary. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, warrant a Goal 4 exception in the Union County Timber-Grazing Zone.</li> <li>IPC addresses the Union County Timber-Grazing Zone Goal 4 exception requirements in more detail in Section 7.1.3 below.</li> <li>In relation to the Union County Timber-Grazing Zone exception requirements, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	GEN-LU-05 Submission of Union County permits
Union County Land Use Permit – Conditional Use Permit (Access Roads; Timber-Grazing Zone, Predominantly Forestland Parcels)	In Union County, portions of the access road Proposed Site Boundary Additions occur in the Union County Timber-Grazing zone, predominantly forestland parcels. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 will comply with the relevant county code provisions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the access road proposed changes, subject to the related Site Certificate conditions, comply with the Union County Timber-Grazing Zone, predominantly forestland, requirements.	GEN-LU-05 Submission of Union County permits
	<ul> <li>IPC addresses the Union County Timber-Grazing Zone, predominantly forestland, requirements in more detail in Section 7.1.3 below.</li> <li>In relation to the Union County Timber-Grazing Zone, predominantly forestland, requirements, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	
Baker County Land Use Permit – Land Use Decision (Utility Facility; EFU Zone)	In Baker County, portions of the Proposed Site Boundary Additions occur in the Baker County EFU zone. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 will comply with the relevant county code provisions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, comply with the Baker County EFU Zone requirements.	GEN-LU-07 Submission of Baker County permits
	<ul> <li>IPC addresses the Baker County EFU Zone requirements in more detail in Section 7.1.3 below.</li> <li>In relation to the Baker County EFU Zone requirements, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	
Baker County Land Use Permit – Conditional Use Permit (Rural Service Area Zone)	None of the Proposed Site Boundary Additions occur in the Baker County Rural Service Area zone.	GEN-LU-07 Submission of Baker County permits

Standard or Other Permit  Baker County Land Use Permit – Land Use Decision (Utility	Compliance In Baker County, portions of the Proposed Site Boundary Additions occur	Related Site Certificate Conditions  GEN-LU-07 Submission of Baker County permits
Facility; EFU and ERU Zones)	in the Baker County EFU-ERU zones. As discussed in Section 7.1.3 below, the proposed changes in RFA 1 will comply with the relevant county code provisions. Therefore, IPC has demonstrated with the information provided in this RFA 1 that the proposed changes, subject to the related Site Certificate conditions, comply with the Baker County EFU-ERU Zone requirements.	
	<ul> <li>IPC addresses the Baker County EFU-ERU Zone requirements in more detail in Section 7.1.3 below.</li> <li>In relation to the Baker County EFU-ERU Zone requirements, IPC is not proposing any new conditions or changes to existing conditions.</li> </ul>	
Baker County Land Use Permit – Conditional Use Permit (Helipads; EFU and ERU Zones)	None of the Proposed Site Boundary Additions involve helipads.	GEN-LU-07 Submission of Baker County permits
City of North Powder – Conditional Use Permit (Multi-Use Area; Commercial Interchange Zone)	None of the Proposed Site Boundary Additions occur in the City of North Powder.	NA
City of Huntington – Land Use Decision (Multi-Use Area; Commercial Industrial Zone)	None of the Proposed Site Boundary Additions occur in the City of North Huntington.	NA
City of Huntington – Land Use Decision/Temporary Use Permit (Multi-Use Area; Commercial Residential Zone)	None of the Proposed Site Boundary Additions occur in the City of North Huntington.	NA

### 7.1 Division 22 Standards Discussed in Detail

## 7.1.1 Structural Standard - OAR 345-022-0020

The Structural Standard generally requires the Council to evaluate whether the Certificate Holder has adequately characterized the potential seismic, geological, and soil hazards within the site boundary, and that the Certificate Holder can design, engineer, and construct the Project to avoid dangers to human safety from these hazards.

For the Proposed Site Boundary Additions, IPC employed the same methods used in the ASC to characterize the seismic risk of the site. As demonstrated in Figure 7-1, the Little Juniper Canyon Alternative (Map 1) and True Blue Gulch Alternative (Maps 2-4) will be constructed through mapped landslide features. Figure 7-2 characterizes the geological features associated with the Access Road Changes. IPC's engineers will review aerial imagery, and light detection and ranging (or LiDAR) data prior to final design and will use it to identify and assess landslide features, as possible. IPC's engineers will include the potential areas of soil instabilities in the site-specific geotechnical scope of work. Site-specific geotechnical design will consider the most recent version of the International Building Code (IBC 2018) to address the seismic hazards of the Proposed Site Boundary Additions, similar to the evaluation performed in Attachment H-1 of the Final Order.

Prior to the development of final engineering design, based on limited subsurface explorations liquefaction susceptibility will be evaluated at the geotechnical boring locations. Additional evaluation of liquefaction also may be needed as the final alignment and tower locations are chosen. The geotechnical engineer may recommend additional exploration and/or analysis as applicable to assess liquefaction hazards in the geotechnical design report for the transmission line. For locations where liquefaction poses a risk, an assessment of susceptibility may be made to determine if lateral spreading would be an additional hazard.

While seismic activity in the Project area generally could lead to the settling of sediment and exacerbate potential subsidence associated with groundwater withdrawal in more populous regions, no historical cases of subsidence in the specific areas of the Proposed Site Boundary Additions have been identified by IPC, and the majority of the sites have a low susceptibility to subsidence. At this time, there are no specific locations where subsidence studies will be performed. However, if subsidence-prone areas are identified during the Phase 2 geotechnical investigation, the transmission line will be designed and located to avoid subsidence hazards.

As noted above, the Certificate Holder has and will continue to condition compliance adequately to characterize the seismic, geological and soils hazards and can design, engineer, and construct the Proposed Site Boundary Additions to avoid dangers to human safety and the environment. Therefore, based on the information provided in this RFA 1 and the application of the relevant Site Certificate conditions, IPC has demonstrated that the Proposed Site Boundary Additions comply with the Structural Standard.

### 7.1.2 Soil Protection - OAR 345-022-0022

The Soil Protection Standard requires the Council to find that, after taking mitigation into account, the design, construction, and operation of a facility will not likely result in a significant adverse impact to soils. Exhibit I of the ASC identified the soil conditions and land uses in accordance with the submittal requirements in OAR 345-021-0010 (1)(I) paragraphs (A) through (E). The following applies a similar analysis to the Proposed Site Boundary Additions.

## 7.1.2.1 Background Review

IPC identified the properties of soils throughout the RFA 1 site boundary using literature-derived soil properties and land cover types. The U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) maintains the State Soil Geographic Database (STATSGO; NRCS 2011), which presents general soil properties for the entire United States. STATSGO data are used to characterize soil erosion and soil reclamation properties.

The U.S. Geological Survey (USGS) maintains the National Elevation Dataset (NED) with nationwide coverage of detailed elevation information compiled from multiple sources. The NED data were used for the slope analysis presented in this RFA 1.

## 7.1.2.2 Surveys

Site-specific geotechnical investigations are ongoing for all of the Proposed Site Boundary Additions and are not used to inform the analysis in RFA 1. Detailed information relating to the scope of the geotechnical investigation is available in Attachment H-1 of the Final Order. The investigation includes drilling of exploration borings and collection of soil samples for laboratory analysis of soil properties.

## 7.1.2.3 Findings

Figure 7-3 and Figure 7-4 are mapbooks of the STATSGO soil mapping units contained within the proposed site boundary changes. Attachment 7-1 is a table displaying the STATSGO soil properties by soil mapping units contained within the Proposed Site Boundary Additions. Table 7.1-1 summarizes the STATSGO data at the highest soil taxonomic level, soil order.

Table 7.1-1. Soil Orders within the Site Boundary of RFA 1

	Soil Order (acres)						
County	Aridisols	Mollisols	Andisols	Entisols			
Morrow	36.7	103.8	_	-			
Umatilla	_	71.3	_	-			
Union	_	36.7	_	_			
Baker	_	597.8	_	50.5			
Malheur	72.6	66.5	_	_			
RFA 1 Total	109.4	876.1	_	50.5			

Source: STATSGO

Current land uses that may require or depend on productive soils were evaluated by identifying high value farmland soils data and land cover type data. High value farmland soils data are shown in Table 7.1-2 to identify lands that may include current land uses that require or depend on productive soils within the Proposed Site Boundary Additions. The high value farmland soils data do not provide a qualitative description of actual current land use but may be representative of current agricultural land uses within the proposed site boundary changes. For purposes of this analysis, IPC assumes that high value farmland soils are actively used for agricultural purposes and depend on the presence of productive soils. Similarly, IPC assumes that land cover types identified as agriculture (cultivated crops and pasture/hay) and forest/woodland also require productive soils. For estimates on the amount of the Proposed Site

Boundary Additions in agriculture and forest/woodland, see the habitat mapping performed in Section 7.1.5.

Table 7.1-2. High Value Farmland Soils within Site Boundary of RFA 1

County	Site Boundary (acres)	High Value Farmland Soils (acres) <sup>1</sup>
Morrow	140.6	73.8
Umatilla	71.3	59.4
Union	36.7	20.7
Baker	648.3	479.1
Malheur	139.1	7.9
RFA 1 Total	1,036.0	640.9

<sup>&</sup>lt;sup>1</sup> Source: SSURGO data.

Impacts on soils from Project activities are discussed in the ASC in regard to how the Project may contribute to soil erosion, loss of reclamation potential, and the potential for chemical spills. RFA 1 does not describe these potential soil impacts but does identify the RFA 1 soil properties that indicate susceptibility to erosion and loss of reclamation potential. Impacts resulting from chemical spills will be mitigated per the Spill Prevention, Control, and Countermeasures Plan as required under condition GEN-SP-02.

Soil erosion factors are defined in Exhibit I of the ASC and include: soil K factor, wind erodibility, slope, and soil T factor. Table 7.1-3 shows the soil erosion factors for RFA 1 construction areas. Construction areas are inclusive of temporarily disturbed areas that will be reclaimed and areas that will maintain a permanent facility through operation of the Project.

Table 7.1-3. Erosion Factors in RFA 1 Construction Disturbance Area

	Construction Disturbance  Highly Wind Erodible <sup>1,2</sup> K Factor <sup>1,3</sup>					Slope Greater Then 25%⁵		Low T Factor <sup>1,4</sup>	
County	Area (acres)	Acres %		Acres	%	Acres	%	Acres	%
Morrow	23.8	6.0	25.4%	20.2	84.7%	-	_	3.6	15.3%
Umatilla	11.1	_	_	11.1	100%	_	_	6.6	59.3%
Union	6.5	_	_	3.6	55.2%	_	_	2.6	40.2%
Baker	120.6	_	_	74.5	61.8%	25.6	21.2%	105.2	87.2%
Malheur	25.2	2.5	9.9%	5.8	23.0%	1.2	4.6%	21.6	85.4%
RFA 1 Total	187.2	8.6	4.6%	115.1	61.5%	26.8	14.3%	139.5	74.5%

<sup>&</sup>lt;sup>1</sup>Source: STATSGO data.

Soil reclamation factors are defined in Exhibit I of the ASC and include: soil compaction, stonyrocky soils, droughty soil, shallow bedrock, and hydric soils. Table 7.1-4 identifies the soil reclamation factors of soils in the Proposed Site Boundary Additions construction areas. The NRCS STATSGO soil properties were reviewed within the Proposed Site Boundary Additions. No soil was detected with the combination of fine grain size, and poor drainage characteristics that would result in classification as highly compactible. Therefore, no areas within the

<sup>&</sup>lt;sup>2</sup>Highly wind erodible include STATSGO wind erodibility classes 1 through 4 (wind erosion greater than or equal to 86 tons per acre per year.

<sup>&</sup>lt;sup>3</sup> High K factor defined as K factor greater than or equal to 0.37.

<sup>&</sup>lt;sup>4</sup>Lot T factor defined as T factor less than or equal to 2 tons per acre per year.

<sup>&</sup>lt;sup>5</sup> Source: USGS National Elevation Dataset database.

construction disturbance area were identified as needing special considerations for soil compaction.

Table 7.1-4. Soil Reclamation Factors in RFA 1 Construction Disturbance Area

	Construction Disturbance	Stony/Rocky <sup>1,2</sup>		Droughty <sup>1,3</sup>		Shallow Bedrock <sup>1,4</sup>		Hydric Soil <sup>5</sup>	
County	Area (acres)	Acres	%	Acres	%	Acres	%	Acres	%
Morrow	23.8	3.6	15.3%	9.7	40.7%	17.6	74.0%	23.8	100%
Umatilla	11.1	4.5	40.7%	4.5	40.7%	11.1	100%	11.1	100%
Union	6.5	6.0	91.9%	6.0	91.9%	6.0	91.9%	3.1	48.3%
Baker	120.6	120.0	99.5%	120.0	99.5%	105.2	87.2%	120.6	100%
Malheur	25.2	17.5	69.4%	12.8	50.9%	16.6	65.8%	0.6	2.4%
RFA 1 Total	187.2	151.7	81.0%	153.0	81.7%	156.5	83.6%	159.2	52.5%

<sup>&</sup>lt;sup>1</sup>Source: STATSGO data.

Note: SSURGO and STATSGO databases did not contain any highly compactable soil within analysis area; therefore, highly compactable soil is not shown on this table.

#### 7.1.2.4 Conclusion

The Proposed Site Boundary Additions occur in soil conditions that were previously characterized and evaluated in the ASC and do not affect the basis for the Council's previous findings of compliance with the Soil Protection Standard. Changes proposed in RFA 1 would adhere to all soil protection conditions identified in the Site Certificate, including: compliance with the NPDES 1200-C permit and Erosion and Sediment Control Plan (GEN-SP-01); development of a final Spill Prevention Control and Countermeasures Plan (GEN-SP-02 and GEN-SP-03); development of a final Blasting Plan (GEN-SP-04); and regular inspection of the as-built facility components for ongoing soil impacts (OPR-SP-01). Therefore, the Council may conclude that the Proposed Site Boundary Additions comply with the Soil Protection Standard.

#### 7.1.3 Land Use – OAR 345-022-0030

Under OAR 345-021-0010(1)(k), an applicant must elect to address the Council's Land Use standard by obtaining local land use approvals directly from the relevant local governments under Oregon Revised Statutes (ORS) 469.504(1)(a), or by obtaining a Council determination under ORS 469.504(1)(b). In the ASC, IPC elected to have the Council make the land use determination for the Project under ORS 469.504(1)(b) and OAR 345-022-0030(2)(b). The ASC identified applicable substantive criteria from the following local governments: Morrow County, Umatilla County, Union County, Baker County, Malheur County, City of North Powder, and City of Huntington. The analysis area for potential land use impacts, as defined in the ASC, is the area within and extending half-mile from the site boundary. An assessment of applicable substantive criteria for RFA 1 follows with subsections 7.1.3.1 through 7.1.3.13 below.

<sup>&</sup>lt;sup>2</sup>Stony rocky soil is defined as soil with at least 20 percent of soil particles with size greater than 2 mm.

<sup>&</sup>lt;sup>3</sup> Droughty soils are defined as soil with sandy loam or coarser texture, and drainage class of moderately to excessively well-drained.

<sup>&</sup>lt;sup>4</sup>Shallow bedrock is defined as bedrock occurring within 51 inches of ground surface.

<sup>&</sup>lt;sup>5</sup> Source for hydric soil is SSURGO database and Oregon Wetland Database from the Oregon Spatial Data Library (2013).

## 7.1.3.1 Morrow County Applicable Substantive Criteria and Comprehensive Plan

Section 5.2.3 details the proposed changes in Morrow County. The Council previously found that the Project would be consistent with applicable criteria of the MCZO and MCCP.<sup>4</sup> There have been no substantive modifications to the Morrow County Zoning Ordinance (MCZO; Morrow County 2017) or to the Morrow County Comprehensive Plan (MCCP; Morrow County 1986) since the Certificate Holder submitted the ASC on September 28, 2018. Specifically, the Certificate Holder has reviewed and confirmed there have been no changes to the Agricultural, Natural Hazards, Utility Finding, and Goal 5 Resources policies of the Morrow County Comprehensive Plan that were addressed in the Council's Final Order on the ASC. Since September 28, 2018, Morrow County has amended the listing of proposed aggregate sites on the Morrow County Inventory of Natural Resources - Aggregate and Mineral Resources. None of the new mineral aggregate resources identified in the Significant Resource Overlay Map occur within the site boundary or within 0.5 mile of the area subject to RFA 1. As such, Morrow County's Inventory of Natural Resources has not changed in ways that would impact the Council's prior findings under the land use standard.

The proposed changes do not affect the findings provided in the Final Order and summarized in Table 7.1-5.

Table 7.1-5. Morrow County Applicable Substantive Criteria

Section/Subsection	Name	Proposed Changes
Morrow County Zoning Ordinance (MCZO)		
Article 3 – Use Zones		
Section 3.010	Exclusive Farm Use (EFU) Zone	Applicable and complies. Portions of the Proposed Site Boundary Addition in Morrow County will occur within the EFU zone. Transmission lines that are necessary for public service are permitted in EFU lands under MCZO Section 3.010(D)(10), provided the towers are no greater than 200 feet in height. The proposed changes in RFA 1 are part of a transmission line project necessary for public service and do not include towers greater than 200 feet. Accessory uses are also permitted in EFU lands. MCZO 1.030 defines "accessory use" as "a use incidental and subordinate to the main use of the property and located on the same lot as the main use." Because the access roads will serve the transmission lines and will be located on the same lot as the transmission lines, the access roads are considered an accessory use to the transmission lines. Therefore, the portions of the Proposed Site Boundary Addition occurring in the EFU Zone are permitted outright under MCZO 3.010(D)(10).

<sup>&</sup>lt;sup>4</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 162-163 (September 2022)

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Section/Subsection	Name	Proposed Changes
Subsection D	Use Standards	Applicable and complies.
		MCZO 3.010(D)(10) identifies utility
		facilities "necessary" for public service as a
		conditional use permitted on EFU zone
		land, subject to MCZO Article 6 Conditional
		Uses. The Council concluded the
		transmission line and associated access
		roads, modified existing roads, multi-use
		areas, temporary pulling and tensioning
		sites, and communication stations in the
		EFU zone are considered under the "utility
		facility necessary for public service" land
		use category. The Council previously
		found that the conditional use
		requirements beyond those that are
		consistent with ORS 215.275 are not
		applicable to proposed and alternative
		facility components because, as a utility
		facility necessary for public service under
		ORS 215.283(1)(c), the use is permitted
		subject only to the requirements of
		ORS 215.275 and the county cannot
		impose additional approval criteria.
		Therefore, the conditional use
		requirements of MCZO Article 6
		Conditional Uses and are not evaluated as
		applicable substantive criteria. The
		Council's previous determination that the
		ASC complies with Section 3.010(D) and
		ORS 215.275 is applicable to RFA 1.
Section 3.070	General Industrial (M-G)	Not applicable. The ASC included a
	Zone	portion of the transmission line and
		accessory uses within the M-G zone. The
		Proposed Site Boundary Additions are not
		within the M-G zone, so these standards
		do not affect RFA 1.
Subsection A	Uses Permitted Outright	Not applicable. The ASC included a
		portion of the transmission line and
		accessory uses within the M-G zone. The
		Proposed Site Boundary Additions are not
		within the M-G zone, so these standards
	11 1: 20 0	do not affect RFA 1.
Subsection C	Use Limitations	Not applicable. The ASC included a
		portion of the transmission line and
		accessory uses within the M-G zone. The
		Proposed Site Boundary Additions are not
		within the M-G zone, so these standards
		do not affect RFA 1.

Section/Subsection	Name	Proposed Changes
Subsection D	Dimension	Not applicable. The ASC included a
	Requirements	portion of the transmission line and
		accessory uses within the M-G zone. The
		Proposed Site Boundary Additions are not
		within the M-G zone, so these standards
		do not affect RFA 1.
Subsection E	Transportation Impacts	Not applicable. The ASC included a
		portion of the transmission line and
		accessory uses within the M-G zone. The
		Proposed Site Boundary Additions are not
		within the M-G zone, so these standards
		do not affect RFA 1.
Section 3.073	Port Industrial (PI) Zone	Not applicable. The ASC included a
		portion of the transmission line and
		accessory uses within the PI zone. The
		Proposed Site Boundary Additions are not
		within the PI zone, so these standards do
		not affect RFA 1.
Subsection A	Uses Permitted Outright	Not applicable. The ASC included a
		portion of the transmission line and
		accessory uses within the PI zone. The
		Proposed Site Boundary Additions are not
		within the PI zone, so these standards do
		not affect RFA 1.
Subsection C	Use Limitations	Not applicable. The ASC included a
		portion of the transmission line and
		accessory uses within the PI zone. The
		Proposed Site Boundary Additions are not
		within the PI zone, so these standards do not affect RFA 1.
Subsection D	Dimensional Standards	Not applicable. The ASC included a
Subsection D	Differisional Standards	portion of the transmission line and
		accessory uses within the PI zone. The
		Proposed Site Boundary Additions are not
		within the PI zone, so these standards do
		not affect RFA 1.
Subsection F	Transportation Impacts	Not applicable. The ASC included a
	The state of the s	portion of the transmission line and
		accessory uses within the PI zone. The
		Proposed Site Boundary Additions are not
		within the PI zone, so these standards do
		not affect RFA 1.
Section 3.100	Flood Plain Overlay	Applicable and complies. Portions of the
	Zone	Proposed Site Boundary Additions fall
		within the 100-year flood plain along Little
		Juniper Creek, which is classified as a
		Special Flood Hazard Area (SFHA) in the
		Flood Plain Overlay Zone. MCZO
		Section 3.100(4.1-1) establishes that a

Section/Subsection	Name	Proposed Changes
		flood plain development permit is required for construction activities within a SFHA. GEN-LU-O1 requires the Certificate Holder to obtain, prior to construction of any phase or segment of the Project, a Flood Plain Development Permit for work in the Flood Plain Overlay zone. GEN-LU-O2 restricts structure placement within the SFHA, or requires adherence to MCZO requirements for anchoring and construction materials and methods. Because Site Certificate Conditions GEN-LU-O1 and GEN-LU-O2 will apply to the Proposed Site Boundary Additions and IPC will obtain a Flood Plain Development for the relevant portions of the Proposed Site Boundary Additions, the Proposed Site Boundary Additions will comply with Section 3.100.
Section 4.1-1	Development Permit	Applicable and complies. The Proposed Site Boundary Additions fall within the 100-year flood plain along Little Juniper Creek, which is classified as a SFHA in the Flood Plain Overlay Zone. GEN-LU-O1 requires the Certificate Holder to obtain, prior to construction of any phase or segment of the Project, a Flood Plain Development Permit for work in the Flood Plain Overlay zone. Because Site Certificate Conditions GEN-LU-O1 and GEN-LU-O2 will apply to the Proposed Site Boundary Additions and IPC will obtain a Flood Plain Development for the relevant portions of the Proposed Site Boundary Additions, the Proposed Site Boundary Additions will comply with Section 4.1-1.
Section 5.1-1	Anchoring	Applicable and complies. The Proposed Site Boundary Additions fall within the 100-year flood plain along Little Juniper Creek, which is classified as a SFHA. GEN-LU-O2 restricts structure placement within the SFHA, or requires adherence to MCZO requirements for anchoring and construction materials and methods. Because Site Certificate Condition GEN-LU-O2 will apply to the Proposed Site Boundary Additions, the Proposed Site Boundary Additions will comply with Section 5.1-1.

Section/Subsection	Name	Proposed Changes
Section 5.1-2	Construction Materials and Methods	Applicable and complies. The Proposed Site Boundary Additions fall within the 100-year flood plain along Little Juniper Creek, which classifies as SFHA. GEN-LU-O2 restricts structure placement within the SFHA, or requires adherence to MCZO requirements for anchoring and construction materials and methods. Because Site Certificate Condition GEN-LU-O2 will apply to the Proposed Site Boundary Additions, the Proposed Site Boundary Additions will comply with Section 5.1-2.
Section 3.200	Significant Resource (Goal 5) Sites	Applicable and complies. Morrow County established a Significant Resource Overlay Map identifying the location of designated Goal 5 resources. The County indicated in the original ASC that only those resources depicted on the 1986 Significant Resource Overlay Map were considered Goal 5 designated resources in Morrow County. On December 7, 2015, the County provided to IPC Geographic Information System data identifying the location of the Goal 5 designated resources in Morrow County under the 1986 Significant Resource Overlay Map and the MCCP. Figure K-22 of the original ASC depicts the 1986 Significant Resource Overlay Map information provided by Morrow County and shows the upper reach of Juniper Canyon, but not Little Juniper Canyon. There are no Goal 5 resources, as identified in the 1986 map, within the analysis area for RFA 1. Therefore, the Proposed Site Boundary Additions will comply with the County's Goal 5 standards in Section 3.200.
Section D	Review Criteria	Not applicable. There are no Goal 5 resources identified within the analysis area for RFA 1, so these standards do not affect RFA 1.
Section E	List of Conflicting Uses and Activities	Not applicable. There are no Goal 5 resources identified within the analysis area for RFA 1, so these standards do not affect RFA 1.

Section/Subsection	Effect of Proposed Change
Morrow County Com	orehensive Plan
Agricultural Policy 1	The Proposed Site Boundary Additions do not affect consistency with Agricultural Policy 1. GEN-LU-11 requires the Certificate Holder to finalize, prior to construction, an Agricultural Land Assessment and Mitigation Plan, which implements mitigation measures and monitoring during construction. Therefore, the Council's previous findings, analysis, and conclusions that the Project would be consistent with MCCP Agricultural Policy 1 are equally applicable to RFA 1.
Natural Hazards Element	The Proposed Site Boundary Additions do not affect consistency with the Natural Hazards Element. As described under Section 3.100, GEN-LU-O1 requires the Certificate Holder to obtain, prior to construction of any phase or segment of the Project, a Flood Plain Development Permit for work in the Flood Plain Overlay zone. GEN-LU-O2 restricts structure placement within the SFHA, or requires adherence to MCZO requirements for anchoring and construction materials and methods. Therefore, the Council's previous findings, analysis, and conclusions that the Project would be consistent with the MCCP Natural Hazards Element are equally applicable to RFA 1.
Utility Finding C; Policy C	The Proposed Site Boundary Additions do not affect consistency with Utility Finding C; Policy C. The proposed site boundary changes do not impact the selection of the Longhorn Station site. Therefore, the Council's previous findings, analysis, and conclusions that the Project would be consistent with MCCP Utility Finding C; Policy C are equally applicable to RFA 1.
Goal 5 Resources	There are no new Goal 5 resources identified within the analysis area for RFA 1. The Council may find that no additional analysis is required to comply with the County's Goal 5 standards in Section 3.200(E) and the MCCP.

### 7.1.3.2 Umatilla County Applicable Substantive Criteria and Comprehensive Plan

Section 5.2.4 details the portions of the Proposed Site Boundary Addition in Umatilla County. The Council previously concluded that the Project, including access roads, complied with the applicable substantive criteria of Umatilla County's comprehensive plan and development code. There have been no substantive modifications to the Umatilla County Development Ordinance (UCDO; Umatilla County 2022) or to the Umatilla County Comprehensive Plan (UCCP; Umatilla County 2022) since the Certificate Holder submitted the ASC on September 28, 2018. Specifically, the Certificate Holder has reviewed and confirmed there have been no changes to the Open Space, Scenic and Historic Areas, and Natural Resources and Public Facilities and Services Elements of the Umatilla County Comprehensive Plan that were identified in the Final Order for the ASC. Since September 28, 2018, Umatilla County has amended the previously reviewed Transportation Element. However, the change is not substantive (as described in Section 7.1.3.8). In addition, the UCDO has been updated in 2022, but the updates did not change or alter the criteria evaluated with the ASC.

<sup>5</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 168-186 (September 2022)

<sup>&</sup>lt;sup>6</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Proposed Order, p. 184-185 (September 2022)

Table 7.1-6. Umatilla County Applicable Substantive Criteria

Section/Subsection	Name	Effect of Proposed Change		
Umatilla County Development Code (UCDC)				
	Exclusive Farm Use (EFU) Zone			
Section 152.059	Land Use Decisions	Applicable and complies. Portions of the Proposed Site Boundary Additions in Umatilla County will occur within the EFU zone. UCDC 152.059(C) establishes that utility facilities necessary for public service may be permitted in the EFU zone through a zoning permit under UCDC 152.025. The Council previously concluded the associated access roads, modified existing roads, multi-use areas, and communication stations in the EFU zone are considered under the "utility facility necessary for public service" land use category. Therefore, the portions of the Proposed Site Boundary Additions occurring within the County's EFU zone are permitting under Section 152.059.		
Grazing Farm (GF) Zon	e			
Section 152.085	Conditional Uses Permitted	Applicable and complies. Portions of the Proposed Site Boundary Additions in Umatilla County will occur within the GF zone. UCDC 152.085(R) identifies new utility facilities for public service, defined in UCDC 152.617(1)(C) as commercial utility facilities for the purpose of generating and distributing power for public use by sale, as a conditional use permitted on GF zoned land. The Council previously concluded that UCDC 152.085(R) does not apply to facility components located in GF land because it applies to commercial utility facilities for the purpose of generating and distributing power and is therefore not applicable to the non-energy generating facility (or specific non-generating facility components) in the GF zone. Therefore, the portions of the Proposed Site Boundary Additions occurring within the County's Grazing Farm zone are permitted under Section 152.085.		
Section 152.303	Conditional Uses Permitted	Not applicable. The ASC included one temporary multi-use area within Umatilla County's LI zone. The Proposed Site Boundary Additions are not within the LI		

Section/Subsection	Name	Effect of Proposed Change
		zone, so these standards do not affect
		RFA 1.
Section 152.304	Limitations on Use	Not applicable. The Proposed Site
		Boundary Additions are not within the LI
		zone, so these standards do not affect
		RFA 1.
Section 152.306	Dimensional Standards	Not applicable. The Proposed Site
		Boundary Additions are not within the LI
		zone, so these standards do not affect
		RFA 1.
Rural Tourist Commerc		
Section 152.283	Conditional Uses	Not applicable. The ASC included a
	Permitted	portion of a temporary multi-use area
		within Umatilla County's RTC zone. The
		Proposed Site Boundary Additions are
		not within the RTC zone, so these
		standards do not affect RFA 1.
Section 152.284	Limitations on Use	Not applicable. The Proposed Site
		Boundary Additions are not within the
		RTC zone and do not impact the
		temporary multi-use area.
Section 152.286	Dimensional Standards;	Not applicable. The Proposed Site
	Setbacks	Boundary Additions are not within the
		RTC zone and do not impact the
		temporary multi-use area.
General Provisions		W
Section 152.010	Access to Buildings	Applicable and complies.
		UCDC 152.010 establishes general
		provisions for site and building access
		that is applicable to the temporary multi-
		use areas and communications stations
		in all zones. GEN-LU-04 dictates the
		terms necessary to comply with the
		UCDC 152.010 requirements. Because
		Site Certificate Condition GEN-LU-04 will
		apply to the Proposed Site Boundary
		Additions, the Proposed Site Boundary
		Additions will comply with
		UCDC 152.010.
Section 152.016	Riparian Vegetation	Applicable and complies. UCDC
		152.016 establishes standards for
		permitted uses in all zones that result in
		maintenance, removal and replacement
		of riparian vegetation along streams,
		lakes and wetlands. The Council's
		previous determination that the ASC
		complies with Section 152.016 is
	i	applicable to DEA 1 CENTILI 04 will
		applicable to RFA 1. GEN-LU-04 will

Section/Subsection	Name	Effect of Proposed Change
		requirements. Because Site Certificate Condition GEN-LU-04 will apply to the Proposed Site Boundary Additions, the Proposed Site Boundary Additions will comply with UCDC 152.016.
Section 152.017	Conditions for Development Proposals	Applicable and complies. UCDC 152.016 requires that a permitted uses in all zones not impose a significant change in trip generation within the local transportation system. The trip durations associated with the Proposed Site Boundary Additions are similar to those considered by the Council in the Final Order and are not likely to generate a significant increase in trip generation. The Council's previous determination that the ASC complies with Section 152.017 is applicable to RFA 1. PRE-PS-02 will ensure compliance with UCDC 152.017 requirements. Because the Proposed Site Boundary Additions will not generate significant increase in trip generation and Site Certificate Condition PRE-PS-02 will apply to the Proposed Site Boundary Additions, the Proposed Site Boundary Additions will comply with UCDC 152.017.
Section 152.439	Historical, Archeological or Cultural Site/Structure Overlay; Criteria for Review	establishes requirements for proposed uses in the Historical, Archeological or Cultural (HAC) Site/Structure Overlay zone. The Certificate Holder maintains the HAC Overlay zone is over 25 miles from the proposed site boundary and therefore does not apply to the proposed Project site.  As detailed in this RFA 1 under Section 7.1.8, new surveys have occurred to determine the proposed amendment makes no changes that will alter the basis for the Council's earlier findings, or its conclusion that the Project will not likely result in an adverse impact to any historical, cultural and archaeological resources in the Analysis Area, and therefore the amendment request meets the requirement of the Historical, Cultural and Archaeological Resources Standard.

Section/Subsection	Name	Effect of Proposed Change
Section 152.456	Critical Winter Range	Not applicable. UCDC 152.458
233.511 102.100	Overlay; Applicability	establishes requirements for specific uses in the Critical Winter Range (CWR) Overlay zone that would result in eventual placement of a dwelling, and administrative review of non-resource dwellings. The ASC demonstrated that UCDC 152.458 standards apply to dwellings, and because the Project does not include any dwellings, UCDC 152.458 does not apply to the Project.
		Even so, potential impacts to elk and deer winter range were evaluated under the Council's Fish and Wildlife Habitat standard. Section 7.1.5 of this RFA 1 evaluates potential impacts to elk and deer winter range and proposes mitigation that meet that standard.
Goal 5	Technical Report D-63	Applicable and complies. The Proposed Site Boundary Additions cross into medium density archaeological and McKay Creek waterfowl/furbearer Goal 5 resource areas that were previously identified with the original ASC. There are no new Goal 5 resources identified within the analysis area for RFA 1.  The Certificate Holder stated in the original ASC that Umatilla County has not adopted any Goal 5 protection program for furbearers and hunted non-game wildlife, or Goal 5 fish streams.  Nevertheless, impacts to streams and riparian vegetation would be minimized as evaluated under UCDC 152.286 and 152.306 and imposed under Condition GEN-LU-04, which requires a 100-foot setback from structures to the high water mark of any stream, lake or wetland; minimization of cleared vegetation; and, restoration and monitoring. <sup>7</sup>
		As evaluated in the Final Order, UCDC 152.435 through 152.443 are the only applicable provisions to HAC sites within the HAC Site/Structure Overlay Zone

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<sup>&</sup>lt;sup>7</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 184 (September 2022)

Section/Subsection	Name	Effect of Proposed Change
		UCDC. UCDC 152.436 defines an HAC
		site as "any historic, archeological or
		cultural site or structure, or geographic
		area listed on the Umatilla County
		Register of Historic Landmarks or
		recognized as significant by the County
		Comprehensive Plan and Technical
		Report." Umatilla County has not
		identified any specific HAC sites or
		structures included in the Goal 5
		inventory within the analysis area. A
		complete assessment of protected areas,
		scenic resources, and historical
		resources follows below in Sections
		7.1.4, 7.1.7, and 7.1.8. Because Umatilla
		County has not adopted specific
		provisions for Goal 5 HAC sites, the
		Council found no additional analysis is
		required to comply with the County's Goal
		5 planning goals for historic resources.8
		pranting goals for flictions recourses.
		Therefore, the Council may find that no
		additional analysis is required to comply
		with the County's Goal 5 planning goals.
Umatilla County Comp	rehensive Plan	
Open Space, Scenic	The Proposed Site Bound	lary Additions do not affect consistency
and Historic Areas, and	with Open Space, Scenic	and Historic Areas, and Natural Resources
Natural Resources	Element - Finding 37; Poli	icy 37. The Project would predominately be
Element - Finding 37;	located on EFU-zoned lan	nd within Umatilla County which, based on
Policy 37	Policy 37, may be conside	ered open space appropriate for energy
1992	facility use. The Council's	previous determination that the Project
	would not significantly imp	pact accepted farm practices remains
		mplete assessment of protected areas,
	scenic resources, and his	torical resources follows below in Sections
	7.1.4, 7.1.7, and 7.1.8.	
Public Facilities and		lary Additions do not affect consistency
Services Element -		Services Element - Finding 19; Policy 19.
Finding 19; Policy 19		nces for high-voltage transmission lines, as
	and the state of t	American Electric Reliability Corporation
		ctricity Coordinating Council (WECC),
		Council's previous determination that the
		of using existing right-of-ways remains
Şi .	applicable to RFA 1.	

<sup>&</sup>lt;sup>8</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 184 (September 2022)

Section/Subsection	Name	Effect of Proposed Change
Transportation Element	The Proposed Site Boundary Additions do not affect consistency	
- Finding 20; Policy 20	with Transportation Element - Finding 20; Policy 20. Minimum	
	separation distances for high voltage transmission lines, as	
	established by NERC and WECC, remain a constraint. The	
	Certificate Holder worked extensively with local landowners in the	
	siting process and Umatilla County maintains the opportunity to	
	review recommendations	consistent with the Transportation Element
	Finding 20 and Policy 20.	

### 7.1.3.3 Union County Applicable Substantive Criteria and Comprehensive Plan

Section 5.2.5 details the proposed changes in Union County (Figure 4-1, Maps 12 to 17). The Council previously concluded that the Project transmission line, including access roads, complied with the applicable substantive criteria of Union County's development ordinance. There have been no substantive modifications to the Union County Zoning, Partition, and Subdivision Ordinance (UCZPSO; Union County 2015) since the Certificate Holder submitted the ASC on September 28, 2018. The Certificate Holder identified slight differences (detailed below in Table 7.1-7) in criteria references when comparing the ASC and Final Order with UCZPSO available on the County website. However, the differences are not substantive, and the criteria evaluated with the ASC remains consistent with existing applicable criteria in the UCZPSO. As such, an analysis of the updated applicable criteria follows in Section 7.1.3.9.

Table 7.1-7. Union County Applicable Substantive Criteria

Section/Subsection	Name	Effect of Proposed Change	
Union County Zoning,	Union County Zoning, Partition, and Subdivision Ordinance (UCZPSO)		
Exclusive Farm Use(A-	1) Zone		
Section 2.03	Administrative Uses	Not applicable. Portions of the Proposed Site Boundary Additions occur within Union County's EFU A-1 zone. The Final Order listed utility facilities necessary for public service as an administrative use in the A-2 zone; however, the UCZPSO states in Article 2.04(11) that utility facilities necessary for public service are conditional uses with general review criteria. Compliance with the applicable conditional use standards of Article 2.04(11) is detailed under Section 7.1.3.9.	
Agricultural-Grazing (A	-2) Zone		
Section 3.03	Administrative Uses	Not applicable. Portions of the Proposed Site Boundary Additions occur within the County's A-2 zone. The Final Order listed utility facilities necessary for public service as an administrative use in the A-2 zone, however the UCZPSO states in Article 3.04(11) that utility facilities necessary for	

<sup>&</sup>lt;sup>9</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 191-211 (September 2022)

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Section/Subsection	Name	Effect of Proposed Change
		public service are conditional uses with general review criteria. The Council previously found the Project is a utility facility necessary for public service that would be a permitted use in the A-2 zone. As such, an analysis of the updated applicable criteria follows in Section 7.1.3.9.
Section 3.04	Conditional Uses	Applicable and complies. Article 2.04(11) and 3.04(11) state that utility facilities necessary for public service are conditional uses with general review criteria. As such, an analysis of the updated applicable criteria follows in Section 7.1.3.9.
Section 3.05	Use Standards	Applicable and complies. The use standards for a utility facility necessary for public service is listed under UCZPSO Section 3.05(15), as analyzed in Section 7.1.3.9
Section 3.07	Development Standards	Applicable and complies. The Final Order referenced UCZPSO Section 3.07 for development standards, but Section 3.07 speaks to dwellings associated with farm use. The current UCZPSO establishes development standards for uses permitted in the A-2 zone in Section 3.17. The numbering has changed, but the criteria is identical (see comparison in Section 7.1.3.8). No partitions are proposed subject to Section 3.17(1). The Council's previous determination that the ASC complies with Section 3.07 is applicable to RFA 1. GEN-LU-06 ensures compliance with setback requirements outlined in Section 3.17(2) and signage siting requirements outlined in Section 3.17(4). Therefore, the Council may rely on its previous findings and conditions, and the Project, as amended by RFA 1, will continue to comply with these standards.
Section 3.08	Development and Fire Siting Standards	Not applicable. There are no Development and Fire Siting Standards in Article 3.00 and Section 3.08 speaks to accessory farm dwellings. Development and Fire Siting Standards are listed in UCZPSO Section 5.08, which identifies fire siting standards for structures including requirements for placement of signs, specifying the location and size.

Section/Subsection	Name	Effect of Proposed Change
55		GEN-LU-06 ensures compliance with these
		standards by requiring submission of Union
		County permits in accordance with UCZPSO
		Sections 3.08 and 5.08. Since there is no
		reference to signage in Section 3.08, the
		Certificate Holder assumes the Council
		intended to refer to the development
<u> </u>		standards of Section 3.17.
Timber-Grazing (A-4)		
Section 5.03	Administrative Uses	Not applicable. Portions of the Proposed
		Site Boundary Additions will occur within the
		County's A-4 zone. However, the ASC listed
		utility facilities necessary for public service
		as an administrative use in the A-4 zone;
		however, the UCZPSO states in Article
		5.04(21) that new electric transmission lines
		with right-of-way widths up to 100 feet, as
		specified in ORS 772.210, are conditional uses with general review criteria. As such,
		an analysis of the updated applicable criteria follows in Section 7.1.3.9.
Section 5.04	Predominantly	Applicable and complies. Article 5.04(21)
Occilon 5.04	Forestland	states that new electric transmission lines
	Conditional Uses	with right-of-way widths up to 100 feet are
	Conditional CSCS	conditional uses with general review criteria.
		This definition applies the Project. An
		analysis of the updated applicable criteria
		follows in Section 7.1.3.9.
Section 5.06	Minimum Parcel	Not applicable. The updated UCZPSO
	Sizes	details minimum parcel sizes in Article 5.10.
	Action of the Control	The minimum parcel sizes remain
		unchanged; however, no partitions are
		proposed. The parcels to be used for siting
		of the proposed and alternative facility
		components within A-4 zoned land would not
		likely involve partitioning, however if partition
		is necessary, the Certificate Holder would
		work directly with Union County to obtain
		approval according to minimum parcel size
0 ( 5.07	0 01	standards.
Section 5.07	Siting Standards for	Not applicable. The Council previously
	Dwellings and	found that no additional limitations are
	Structures	warranted since the communication stations
		have been sited in a way to minimize any
		unnecessary cumulative impacts. The
		Proposed Site Boundary Additions do not
		involve communication stations or other
		structures, and therefore Section 5.07 does

Section/Subsection	Name	Effect of Proposed Change
		not apply to the Proposed Site Boundary Additions.
Section 5.08	Development and Fire Siting Standards	Applicable and complies. The applicable Development and Fire Siting Standards are listed in UCZPSO Section 5.08, which identifies fire siting standards for structures including requirements for placement of signs, specifying the location and size. These standards have not changed and the Council's previous determination that the ASC complies with Section 5.08 is applicable to RFA 1. GEN-LU-06 ensures compliance with these standards by requiring submission of Union County permits in accordance with UCZPSO Section 5.08. Because Site Certificate Condition GEN-LU-06 will apply to the Proposed Site Boundary Additions, the Proposed Site Boundary Additions will comply with UCZPSO 5.08.
Section 21.06	General Standards for Governing Conditional Uses	Applicable and complies. UCZPSO 21.06 applies to all conditional uses in Union County. These standards have not changed since the ASC was submitted. UCZPSO 21.06(1) requires that conditional uses meet the development standards relevant to uses permitted outright in the zone, including UCZPSO 5.06 (Minimum Parcel Size), UCZPSO 5.07 (Siting Standards for Dwellings and Structures), and UCZPSO 5.08 (Development and Fire Siting Standards), which would be satisfied based on applicant representations and compliance with GEN-LU-06. Because Site Certificate Condition GEN-LU-06 will apply to the Proposed Site Boundary Additions, the Proposed Site Boundary Additions will comply with UCZPSO 21.06.
Supplementary Provisi		
Section 20.08	Riparian Zone Setbacks	Applicable and complies. The Proposed Site Boundary Additions do not change conditions that would alter the Council's previous determination that the ASC complies Section 20.08. These standards have not changed since the ASC was submitted. The Council imposed GEN-LU-06 to ensure the locations the Project will cross or be near Class I streams complies with the riparian area setback requirements of

Section/Subsection	Name	Effect of Proposed Change
		UCZPSO 20.08. Because Site Certificate Condition GEN-LU-06 will apply to the Proposed Site Boundary Additions, the Proposed Site Boundary Additions will comply with UCZPSO 20.08.
Section 20.09	Significant Goal 5 Resource Areas	Applicable and complies. The proposed site boundary changes cross into Big Game Winter Range Goal 5 resource areas that were previously identified with the original ASC. Union County indicated that its mapping is intended to be over-inclusive of possible habitat areas. 10 The standards of Section 20.09 have not changed since the ASC was submitted. In the original ASC, the Certificate Holder evaluated the economic, social, energy, and environmental criteria to demonstrate compliance with Union County's Goal 5 Resources Comprehensive Plan Element implemented through UCZPSO 20.09 Based on the Certificate Holder's detailed evaluation, the Council found the Project complies with UCZPSO 20.09.11
		The Proposed Site Boundary Additions would generally be in proximity to the approved site boundary, be constructed of the same materials and components previously described in Exhibit B of the ASC, and would occur in similar habitat types, topography, and land uses to those previously considered. As depicted on Figure 4-2, the Certificate Holder has attempted to use existing roads and to limit the development of new roads in Big Game Winter Range overlay areas. These efforts have resulted in the development of a proposed access road system to support the construction of the transmission line that substantially relies on the system of publicly maintained roads as well as unimproved roads on public and private lands. Therefore, the previous evaluation remains consistent with the Proposed Site Boundary Additions, and the Council may rely on its previous

<sup>&</sup>lt;sup>10</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 207

<sup>(</sup>September 2022)

11 Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 211 (September 2022)

Section/Subsection	Name	Effect of Proposed Change
		findings and conditions that the Project complies with the County's Goal 5 planning goals.

## 7.1.3.4 Baker County Applicable Substantive Criteria and Comprehensive Plan

Section 5.2.6 details the proposed changes in Baker County. The Council previously concluded that the Project complied with the applicable substantive criteria of Baker County's development ordinance. The Baker County Zoning and Subdivision Ordinance (BCZSO; Baker County 2020) has been updated since the Certificate Holder submitted the ASC on September 28, 2018. However, the updates (detailed in Table 7.1-8) are not substantive and criteria evaluated with the ASC remains consistent with existing applicable criteria in the BCZSO, which has been amended to clarify and reorganize standards. The amended standards mirror what was previously evaluated with Exhibit K of the ASC. There have been no identified updates to the Baker County Comprehensive Plan since the ASC was submitted on September 28, 2018.

Table 7.1-8. Baker County Applicable Substantive Criteria

Section/Subsection	Name	Effect of Proposed Change
Baker County Zoning and Subdivision Ordinance (BCZSO)		
Article 3: Uses Zone	s	
Section 301 Exclusive	Farm Use Zone	
Subsection 301.02	Conditional Uses	Not applicable. Portions of the Proposed Site Boundary Additions occur within Baker County's EFU zone. Section 301 establishes that "major utility facilities as defined in Section 108(B)" and their accessory uses (including roads) are conditional uses within Baker County's EFU zone, subject to BCZSO 301.05, 301.06 and Article 6 of the ordinance. The BCZO has been amended and Section 301 has been renumbered as Chapter 410, which authorizes "utility facilities necessary for public service" as a Type II administrative decision as analyzed in Section 7.1.3.9.
Section 305 Rural Ser	vice Area	T
Subsection 305.02	Conditional Uses	Applicable and complies. Portions of the Proposed Site Boundary Additions occur within Baker County's Rural Service Area (RSA) zone. The Project and its related and supporting facilities (including access roads) are considered a major utility facility for purposes of BCZSO 150.03 (formerly Section 108(B)). As stated in the ASC, the BCZSO indicates Project features in the RSA Zone are permitted conditional uses. Due to the limited potential impacts

<sup>&</sup>lt;sup>12</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 216-227 (September 2022)

Section/Subsection	Name	Effect of Proposed Change
		resulting during construction and operation of facility components within RSA zoned land, the Council found that the facility would satisfy the standards granting a conditional use. The BCZSO has been amended, but standards addressed in the ASC for conditional uses are not
		substantially different from the amended BCZSO Conditional Use approval criteria in the newly adopted Chapter 210.04(A)(1-6).
Article 4: Supplemen	ntary Provisions	and morning disciplines are supported by the support
Section 401	Setbacks and Frontage Road Requirements Flood Plain District	Applicable and complies. The BCZSO has been amended and Section 301 has been renumbered as Chapter 340 Development Standards (Setback Requirements) for All Zones. A comparison of these chapters follows below in Section 7.1.3.8.
Section 412	Historic/Cultural and Natural Area Protection Procedure	Applicable and complies. The BCZSO has been amended and Section 301 has been renumbered as Chapter 710. A comparison of these chapters follows below in Section 7.1.3.8.
Section 410	Flood Plain Provisions	Not applicable. Section 410 Flood Plain Provisions was removed during the update to BCZSO. A new section, Chapter 630 Floodplain Development Zone was adopted for floodplain management. The Proposed Site Boundary Additions are not within the floodplain development zone and is therefore not applicable to RFA 1.
Article 6: Conditiona		
Section 602	Standards for Granting a Conditional Use	Applicable and complies. As stated above, utility facilities necessary for public service are permitted in the EFU zone as an administrative permit, therefore the standards for granting a conditional use are not applicable to RFA 1.
		However, the conditional use standards remain applicable for the portions of the Project within the RSA and Recreation Residential (RR-2) zones in Baker County. The standards addressed in the ASC for conditional uses remain largely the same as the amended BCZSO Conditional Use approval criteria in Chapter 210.04(A)(1-6). The chapter has been renumbered, but the criteria is consistent with the language

Section/Subsection	Name	Effect of Proposed Change
		previously addressed in the previous BCZSO Section 602. A comparison of these chapters follows below in Section 7.1.3.8.
Baker County Comp	rehensive Plan	
Goal V Open Space, Scenic and Historic Areas and Natural Resources Open Spaces and Scenic Areas Natural Areas Historic and Cultural Sites, Structures, Districts	would be located within E could potentially impact is Baker County Comprehe Portions of the Proposed the Big Game Overlay. In Goal 5 resources to confin significant adverse impacts and use regulated big game habitat and do applicable to permitted us impacts to riparian vegets. Based on compliance with permitted in the EFU zon be consistent with the cobig game habitat. 13 A corrections.	Raker County's Big Game Overlay zone and several scenic resources protected under the ensive Plan Goal 5 Resources element. It Site Boundary Additions also occur within an ASC Exhibit K, the applicant evaluated firm that the proposed facility would not result pacts. The Final Order stated that Baker ations for the EFU zone are compatible with not include any Goal 5 protection programs uses in the EFU zone. To minimize potential eation, the Council imposed GEN-LU-07. Ith GEN-LU-07 and because the facility is ne, the Council found the proposed use would bunty's Goal 5 planning goals for protecting mplete assessment of protected areas and below in Sections 7.1.4 and 7.1.7.

## 7.1.3.5 Malheur County Applicable Substantive Criteria and Comprehensive Plan

Section 5.2.7 details the Proposed Site Boundary Additions in Malheur County. The Council previously concluded that the Project complied with the applicable substantive criteria of Malheur County's development ordinance. <sup>14</sup> The Malheur County Code (MCC; Malheur County 2021) has been updated since the Certificate Holder submitted the ASC on September 28, 2018. However, the updates to the MCC did not change the criteria evaluated with the ASC. There have been no identified updates to the Malheur County Comprehensive Plan since the ASC was submitted on September 28, 2018.

Table 7.1-9. Malheur County Applicable Substantive Criteria

Section/Subsection	Name	Effect of Proposed Change
Malheur County Code (	MCC)	
Exclusive Farm use and	Exclusive Range Us	e
MCC 6-3A-2	Permitted Uses	Applicable and complies. Portions of the Proposed Site Boundary Additions occur within Malheur County's EFU zone. The Project is a transmission line necessary for public service, which is permitted outright in EFU lands, provided the towers are no greater than 200 feet in height. The proposed site boundary changes do not affect compliance with standards of the EFU

<sup>&</sup>lt;sup>13</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 225 (September 2022)

<sup>&</sup>lt;sup>14</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 229-236 (September 2022)

Section/Subsection	Name	Effect of Proposed Change
	Name	Zone. As described in this RFA 1, the Council concluded the transmission line and associated access roads, modified existing roads, multi-use areas, temporary pulling and tensioning sites, and communication stations in the EFU zone are considered under the "utility facility necessary for public service" land use category. The Proposed Site Boundary Additions occur within the County's EFU zone and the Council's previous determination that the ASC complies with MCC 6-3A-2 is applicable to RFA 1. GEN-LU-08 requires the Certificate Holder to obtain applicable permits from Malheur County prior to construction (including a zoning permit for components in the EFU zone). Therefore, the Council may rely on its previous findings and conditions, and the Project, as amended by RFA 1, will continue to comply with these standards.
Heavy Industrial Use MCC 6-31-4	Derformance	Applicable and complies A portion of the
	Performance Standards	Applicable and complies. A portion of the Proposed Site Boundary Additions is within the Heavy Industrial Use zone, where "utility facilities" are allowed as a conditional use. As described in this RFA 1, the Council concluded the transmission line and associated access roads are considered under the "utility facility necessary for public service" land use category. GEN-LU-08 requires the Certificate Holder to obtain applicable permits from Malheur County prior to construction (including a zoning permit for development of facility components in the Heavy Industrial (C-12) zone). Therefore, the Council may rely on its previous findings and conditions, and the Project, as amended by RFA 1, will continue to comply with these standards.
Flood Plain Management MCC 6-3K-3	Flood Plain	Applicable and complies. Under MCC 6-
	Development Standards	3K-3, any development within the 100-year flood plain requires compliance with MCC Title 5, Chapter 2, the Federal Insurance Administration requirements, and the standards of the underlying primary zone. The Certificate Holder stated in the original ASC that it does not anticipate that any permanent Project features will be located

Section/Subsection	Name	Effect of Proposed Change	
	Numb	with the 100-year flood plain in Malheur County. A portion of the Proposed Site Boundary Additions, specifically existing road improvements along the Malheur River, is within a Malheur County SFHA. However, these existing road improvements are not considered "permanent construction." MCC Chapter 2 Flood Control states "permanent construction does not include land preparation, such as clearing, grading and filling; nor does it include the installation of streets and/or walkways. Further, GEN-LU-08 requires the Certificate Holder to provide applicable permits approved by Malheur County prior to construction (including flood plain development permits for each location where development could occur within a regulatory floodplain). Therefore, the Council may rely on its previous findings and conditions, and the Project, as amended by RFA 1, will continue to comply with these standards.	
MCC 5-2-5-1; 5-2-5-2	Flood Hazard Reduction	Applicable and complies. GEN-LU-08 requires the Certificate Holder to provide applicable permits approved by Malheur County prior to construction (including flood plain development permits for each location where development could occur within a regulatory floodplain). Therefore, the Council may rely on its previous findings and conditions, and the Project, as amended by RFA 1, will continue to comply with these standards.	
Malheur County Compre	Major (Major)		
Goal 3 Agricultural Lands, Policies 2, 7, 8 and 9	The proposed site boundary changes do not affect consistency with Agricultural Policy 1. GEN-LU-11 requires the Certificate Holder to finalize, prior to construction, an Agricultural Land Assessment and Mitigation Plan, which implements mitigation measures and monitoring during construction. Therefore, the Council's previous determination that the Project would be consistent with MCCP Agricultural Lands Policies 2, 7, 8, and 9 remains applicable to RFA 1.		

## 7.1.3.6 City of North Powder Applicable Substantive Criteria and Comprehensive Plan

The Council previously concluded that the Project complied with the applicable substantive criteria of the City of North Powder's comprehensive plan and development ordinance. <sup>15</sup> None of the Proposed Site Boundary Additions occur within the City of North Powder, and therefore the Council may find that no additional analysis is required to comply with the standards outlined in Table 7.1.3-6.

## 7.1.3.7 City of Huntington Applicable Substantive Criteria and Comprehensive Plan

The Final Order described how the multi-use area within the City of Huntington would be located within both the Commercial Industrial (CI) Zone and Commercial Residential (CR) Zone, as represented in ASC Exhibit K Figure K-53, City of Huntington Zoning and Proposed Multi Use Area. In ASC Exhibit K Section 6.9.2.1., the Certificate Holder describes that, in a June 2, 2016 email, the City of Huntington indicated that because the multi-use area would be a temporary use, no provisions of the City of Huntington Zoning Ordinance (CHZO) would apply and no City permits would be required. None of the Proposed Site Boundary Additions occur within the City of Huntington, and therefore the Council may find that no additional analysis is required.

## 7.1.3.8 Updated Applicable Substantive Criteria

Table 7.1-10 shows a comparison between the substantive criteria evaluated in the ASC against the updated version of the current substantive criteria.

Table 7.1-10. Comparison of Updated Applicable Substantive Criteria and Archived Applicable Substantive Criteria Previously Analyzed with the ASC

Archived Applicable Criteria	Updated Applicable Criteria
Umatilla County Comprehensive Plan	Umatilla County Comprehensive Plan
Transportation Element Finding 20 and	Transportation Element Finding 18 and
Policy 20	Policy 18
Finding 20. Major transmission lines (natural	Finding 18. Major transmission lines (fuel,
gas and electricity) traverse the county with	power and communication) traverse the
additional expansion proposed, and	County. Additional expansion proposed, and
additional new lines or pipelines could be	additional new lines or pipelines could be
proposed through the county.	proposed through the County.
Policy 20. The county will review right-of-way	Policy 18. The County will review right-of-
acquisitions and proposals for transmission	way acquisitions and proposals for
lines and pipelines so as to minimize adverse	transmission lines and pipelines so as to
impacts to the community.	minimize adverse impacts on the community.
Response: The amended text changes the definition of "major transmission lines" as	
applying to "natural gas and electricity" lines to "fuel, power, and communication" lines.	
Finding 18 still applies to the Project, including the Proposed Site Boundary Additions,	
because it transmits electrical "power." Beyond the definition change, Umatilla County's	
Transportation Element findings and policies have not changed in ways that would impact the	
Council's prior findings under the land use standard.	
Union County (UCZPSO) 3.07	Union County (UPZPSO) 3.17
Development Standards	Development Standards

<sup>&</sup>lt;sup>15</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 239-241(September 2022)

<sup>&</sup>lt;sup>16</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 242 (September 2022)

### **Archived Applicable Criteria**

Any proposed division of land included within the A-2 Zone resulting in the creation of one or more parcels of land shall be reviewed and approved or disapproved by the County (ORS 215.263).

Setbacks from property lines or road rightsof-way shall be a minimum of 20-feet front and rear yards and 10-feet side yards. Animal shelters shall not be located closer than 100 feet to an R-1 or R-2 Zone. Signs shall be limited to the following: a. All off-premise signs within view of any State Highway shall be regulated by State regulation under ORS Chapter 377 and receive building permit approval.

- b. All on-premise signs shall meet the Oregon Administrative Rule regulations for on-premise signs which have the following standards:
- A. Maximum total sign area for one business is 8% of building area plus utilized parking area, or 2,000 square feet, whichever is less. B. Display area maximum is 825 square feet for each face of any one sign, or half the total allowable sign area, whichever is less.
- C. Businesses which have no buildings located on the premises or have buildings and parking area allowing a sign area of less than 250 square feet may erect and maintain on-premises signs with the total allowable area of 250 square feet, 125 square feet maximum for any one face of a sign.
- D. Maximum height of freestanding signs adjacent to interstate highways is 65 feet, for all other highways is 35 feet, measured from the highway surface or the premises grade, whichever is higher to the top of the sign.

  E. All on-premise signs within view or 660 feet of any State Highway shall obtain permit approval from the Permit Unit Oregon State
- approval from the Permit Unit, Oregon State Highway Division. No sign shall be moving, revolving or flashing, and all lighting shall be directed away from residential use or zones, and shall not be located so as to detract from a motorists vision except for emergency purposes.

## **Updated Applicable Criteria**

- Any proposed division of land included within the A-2 Zone resulting in the creation of one or more parcels of land shall be reviewed and approved or disapproved by the County (ORS 215.263).
- Setbacks from property lines or road rights-of-way shall be a minimum of 20-feet front and rear yards and 10-feet side vards.
- Animal shelters shall not be located closer than 100 feet to an R-1 or R-2 Zone.
- Signs shall be limited to the following:
- A. All off-premise signs within view of any State Highway shall be regulated by State regulation under ORS Chapter 377 and receive building permit approval.
- B. All on premise signs shall meet the Oregon Administrative Rule regulations for on premise signs which have the following standards:
- (1) Maximum total sign area for one business is 8% of building area plus utilized parking area, or 2,000 square feet, whichever is less.
- (2) Display area maximum is 825 square feet for each face of any one sign, or half the total allowable sign area, whichever is less.
- (3) Businesses which have no buildings located on the premises or have buildings and parking area allowing a sign area of less than 250 square feet may erect and maintain on-premises signs with the total allowable area of 250 square feet, 125 square feet maximum for any one face of a sign.
- (4) Maximum height of freestanding signs adjacent to interstate highways is 65 feet, for all other highways is 35 feet, measured from the highway surface or the premises grade, whichever is higher to the top of the sign.
- C. All on premise signs within view or 660 feet of any State Highway shall obtain permit approval from the Permit Unit, Oregon State Highway Division. No sign shall be moving, revolving or flashing, and all lighting shall be directed away from residential use or zones, and shall not be located so as to detract from a motorist vision except for emergency purposes.

## **Archived Applicable Criteria**

## **Updated Applicable Criteria**

<u>Response:</u> The side-by-side comparison of these applicable criteria in the UCZPSO demonstrate that the only changes are in the numbering and lettering of the standard. The text is identical and therefore the intent remains the same. The Council may find that there are no substantive changes to the applicable criteria previously addressed with the ASC.

# Baker County (BCZSO) Section 602 Standards for Granting a Conditional Use

- A. The proposal will be consistent with the Comprehensive Plan and objectives of this Zoning and Subdivision Ordinance and other applicable policies of the County.
- B. Taking into account location, size, design and operating characteristics, the proposal will have a minimal adverse impact on the (1) livability, (2) value, and (3) appropriate development of abutting properties and the surrounding area compared to the impact of development that is permitted outright.
- C. The location and design of the site and structures for the proposal will be as attractive as the nature of the use and its setting warrant.
- D. The proposal will preserve assets of particular interest to the community.

# Baker County (BCZSO) Chapter 210 Conditional Uses Approval Criteria

- 1. The proposal will be consistent with the Comprehensive Plan and objectives of this Ordinance and other applicable policies of the County.
- 2. Taking into account location, size, design and operating characteristics, the proposal will have a minimal adverse impact on the (1) livability, (2) value, and (3) appropriate development of abutting properties and the surrounding area compared to the impact of development that is permitted outright.
- 3. All required public facilities have adequate capacity to serve the proposal.
- 4. The proposal will not result in emissions that damage the air or water quality of the area. Documentation is required to demonstrate that required state and federal discharge permits have been obtained.
- 5. The location and design of the site and structures for the proposal will be as attractive as the nature of the use and its setting warrant.
- 6. The proposal will preserve assets of particular interest to the community.

Response: The side-by-side comparison of these applicable criteria in the BCZSO demonstrate that the only changes are to include the new provision that "3. All required public facilities have adequate capacity to serve the proposal" and "4. The proposal will not result in emissions that damage the air or water quality of the area. Documentation is required to demonstrate that required state and federal discharge permits have been obtained." Site Certificate Condition GEN-LU-07 requires the Certificate Holder to obtain applicable permits required by Baker County ordinances. If after commencement of construction the Certificate Holder determines additional County-approved permits are required, the Certificate Holder will provide to the department a copy of those additional permits. In addition, Site Certificate Condition PRE-PS-02 was imposed to address public services criteria. PRE-PS-02 requires the Certificate Holder to submit a Transportation and Traffic Plan for review and approval by the Department in consultation with the affected county. The condition also requires that, through county-issued road-related permits, the Certificate Holder execute a formally binding agreement with the county for use of and potential impacts to roads during construction activities. With respect to new provision 4, the Proposed Site Boundary Additions will not result in any air or water quality impacts that the Council did not previously consider and analyze in the Final Order, Therefore, the Council may find the Project complies with the current standard.

# Archived Applicable Criteria BCZSO Section 401 Setbacks and Frontage Road Requirements Flood Plain District

#### A. APPLICATION

These requirements shall apply to all structures except for adjustments permitted in Section 402. See also Section 407(B).

#### **B. STANDARDS**

- 1) The minimum land width at the front building lines shall be 220 feet.
- 2) No part of a structure shall be constructed or maintained closer than 60 feet to the center line of a road or street, or 30 feet from any right-of-way in excess of 60 feet.
- 3) No part of a building or other structure, except for a sign, shall be constructed or maintained closer than 10 feet to any property line.
- 4) No part of a building or other structure requiring a building permit or farm use affidavit or a road to access such development, shall be constructed within 50 feet of a naturally occurring riparian area, bog, marsh or waterway.

## Updated Applicable Criteria BCZSO Chapter 340 Development Standards (Setback Requirements)

#### A. Applicability.

These requirements shall apply to all structures except for adjustments permitted in Section 340.03 and Livestock Concentration Limitations in Section 510.05.

#### B. Standards.

- 1. Minimum road frontage shall be 220 feet per parcel, unless the subject property is:
  - a. Currently accessed or proposed to be accessed from a dead-end road, in which case 60 feet of road frontage shall be required; or
  - b. Accessed by an easement granted before 2005, in which the width of the existing easement shall suffice; or
  - c. A parcel or lot on the radius of a road or facing the circular end of a cul-de-sac, in which case no less than 30 feet of road frontage shall be required upon said road, measured on the arc of the right-of-way. Such frontage shall be subject to the standards set forth in Chapter 340.
- 2. No part of a structure shall be constructed or maintained closer than 60 feet to the centerline of a road or street, or 30 feet from any right-of-way in excess of 60 feet.
- 3. No part of a building or other structure, except for a sign, shall be constructed or maintained closer than 10 feet to any property line.
- 4. If any part of a structure and/or development is proposed within a jurisdictional wetland, as described in Section 660.03, notification shall be provided by the Baker County Planning Department to the Department of State Lands, as required by ORS 196.795-990. The applicant/property owner shall be responsible for obtaining all necessary permits for the proposed structure and/or development from the Department of State Lands.

**Response:** The amended text in BCZSO Chapter 340 is generally the same as previously written in the archived version of BCZSO analyzed with the ASC. The updates add clarity, but do not change the intent of the setback restrictions, which remain the same for the Project.

#### **Archived Applicable Criteria**

#### **Updated Applicable Criteria**

BCZSO Chapter 150 defines "building" as "a structure built for the support, shelter or enclosure of persons, animals, goods, chattel, or property of any kind."

- Access roads: The Project access roads will not be built to support, shelter, or enclose
  anything. Therefore, the access roads are not considered buildings, and the yard
  setback requirements of BCZSO 401(B)(1) do not apply to the relevant access roads.
- <u>Transmission Line Towers</u>: The Project transmission towers will not be built to support, shelter, or enclose anything. Therefore, the transmission towers are not considered buildings, and the yard setback requirements of BCZSO 340 (B)(1) do not apply to the relevant towers.
- <u>Light-Duty Fly Yards</u>: There will be no light-duty fly yards in the proposed Baker County alternatives. Therefore, the yard setback requirements of BCZSO 340(B)(1) do not apply to the relevant towers.
- <u>Multi-Use Areas</u>: There will be no multi-use areas in the proposed Baker County alternatives. Therefore, the yard setback requirements of BCZSO 340(B)(1) are not applicable.
- <u>Communication Stations</u>: There will be no communication stations in the proposed Baker County alternatives. Therefore, the yard setback requirements of BCZSO 340(B)(1) are not applicable.

GEN-LU-07 requires the Certificate Holder to provide applicable permits approved by Baker County prior to construction. In addition, CON-LU-01 ensures the Certificate Holder complies with applicable setback distances and other requirements in Baker County. Therefore, the Council may rely on its previous findings and conditions, and the Proposed Site Boundary Additions will continue to comply with these standards.

## BCZSO Section 412 Historic/Cultural and Natural Area Protection Procedure

This Section shall not apply to sites designated as 3A or 3B sites, pursuant to OAR 660-16-010 (1) and (2), respectively. Major alteration or destruction of a Natural Area designated as 2A or 3C shall first require an ESEE analysis, justification, and Plan Amendment.

A permit shall be required to destroy or make major alteration to a historic/cultural/natural site or structure inventoried as significant in the County Comprehensive Plan. Upon receipt of an application for said permit, the Planning Department shall institute a 30-day hold. During that time various actions will be initiated by the County depending upon the nature of the threatened resource. All of the inventoried natural sites, historic sites and the cultural sites identified with one, two or three stars will be subject to a public hearing. Notice of the proposed change and public hearing will be provided to the general public, the State Historic Preservation Office, the

## BCZSO Chapter 710 Historic, Cultural, and Natural Resources Protection

710.02 Applicability. This Section shall not apply to sites designated as 3A or 3B sites, pursuant to OAR 660-016-0010(1) and OAR 660-016-0010(2), respectively. Major alteration or destruction of a Natural Area designated as 2A or 3C shall first require an ESEE (economic, social, environmental and energy) analysis, justification, and subsequent Plan Amendment application.

#### 710.03 Permits Required

A. A permit shall be required to destroy or make major alteration to a historic/cultural/natural site or structure inventoried as significant in the County Comprehensive Plan. Upon receipt of an application for said permit, the Planning Department shall institute a 30-day hold. During that time various actions will be initiated by the County depending upon the nature of the threatened resource. All of the inventoried natural sites, historic sites and the cultural sites identified with one, two or three

#### **Archived Applicable Criteria**

State Natural Heritage Advisory Council, the State Department of Fish and Wildlife and/or affected local historical, cultural, or governmental entities. The opportunity to educate, persuade, pay for, and/or require the preservation of a significant resource will be provided by the County. At the hearing before the Planning Commission a review will be conducted to determine:

- A. If the change will destroy the integrity of the resource.
- B. If the proposal can be modified to eliminate its destructive aspects.
- C. If any agency or individual is willing to compensate the resource owner for the protection of the resource.
- D. If the resource can be moved to another location.
- If, after this review, it is determined by the County that the integrity of a significant historic/cultural structure or townsite or a Natural Area resource is threatened, the following criteria will be applied to decide whether to allow, allow with conditions, or disallow the proposed change.

## FOR SIGNIFICANT HISTORIC/CULTURAL STRUCTURES AND TOWNSITES

- A. The historic/cultural structure or townsite constitutes a hazard to the safety of the public occupants and cannot reasonably be repaired; or
- B. The retention of the historic/cultural structure or townsite would cause financial hardship to the owner which is not offset by public interest in the structure's/townsite's preservation; or
- C. The improvement project is of substantial benefit to the County and cannot be reasonably located elsewhere, and overrides the public's interest in the preservation of the historic/cultural structure or townsite; or
- D. Major exterior alteration shall, to the extent possible, be consistent with the historic/cultural character of the structure.

#### FOR SIGNIFICANT NATURAL AREAS

A. The existence of a site report: The site's relative significance is indicated by the

#### **Updated Applicable Criteria**

stars will be subject to a public hearing. Notice of the proposed change and public hearing will be provided to the general public, the State Historic Preservation Office, the State Natural Heritage Advisory Council, the State Department of Fish and Wildlife and/or affected local historical, cultural, or governmental entities. The opportunity to educate, persuade, pay for, and/or require the preservation of a significant resource will be provided by the County. At the hearing before the Planning Commission a review will be conducted to determine:

- 1. If the change will destroy the integrity of the resource.
- 2. If the proposal can be modified to eliminate its destructive aspects.
- 3. If any agency or individual is willing to compensate the resource owner for the protection of the resource.
- 4. If the resource can be moved to another location.
- B. If, after this review, it is determined by the County that the integrity of a significant historic/cultural structure or townsite or a natural area resource is threatened, the following criteria will be applied to decide whether to allow, allow with conditions, or disallow the proposed change:
- 1. For significant historic/cultural structures and townsites.
- a. The historic/cultural structure or townsite constitutes a hazard to the safety of the public occupants and cannot reasonably be repaired; or
- b. The retention of the historic/cultural structure or townsite would cause financial hardship to the owner which is not offset by public interest in the structure's/townsite's preservation; or
- c. The improvement project is of substantial benefit to the County and cannot be reasonably located elsewhere, and overrides the public's interest in the preservation of the historic/cultural structure or townsite; or

#### **Archived Applicable Criteria**

existence of a site report indicating a field survey with one or more elements verified.

- B. Number of elements: The site is elevated to a higher priority if it contains a diversity of natural elements.
- C. Past use of land: The degree to which man's activities have already impacted an area is a significant factor in determining the value of protecting the resource.
- D. Abundance and quality of the same resource elsewhere on the County's inventory: In reviewing such comparative information the County will be able to make its decision knowing the relative significance of the resource in question.
- E. Financial impact: A determination that the retention of the natural area would cause financial hardship to the owner not offset by public interest in the site's preservation would be a determining factor in the County's decision.
- F. Public benefit from the proposed change: A finding that the change is of substantial benefit to the County and cannot be accommodated feasibly elsewhere on the applicant's property would be a significant factor in the County's decision.

## FOR RESOURCES ON FEDERALLY MANAGED LANDS

The findings and conclusions of Baker County relative to a proposed alteration or demolition of a significant cultural/ historic/natural site/structure shall be forwarded to the appropriate federal agency as a recommendation.

## FOR RESOURCES NOT INVENTORIED OR DESIGNATED AS 1B

For resources of unknown significance or resources not on the inventory, a local review will be conducted by BLM and USFS personnel with the consent of their supervisors, Oregon Department of Fish and Wildlife, State and/or college historians and local museum and historical society members to evaluate the resource's comparative worth and make a recommendation as to whether a full public hearing is warranted.

#### **Updated Applicable Criteria**

- d. Major exterior alteration shall, to the extent possible, be consistent with the historic/cultural character of the structure.
- 2. For significant natural areas.
- a. The Existence of a Site Report. The site's relative significance is indicated by the existence of a site report indicating a field survey with one or more elements verified.
- b. Number of Elements. The site is elevated to a higher priority if it contains a diversity of natural elements.
- c. Past Use of Land. The degree to which human activities have already impacted an area is a significant factor in determining the value of protecting the resource.
- d. Abundance and Quality of the Same Resource Elsewhere on the County's Inventory. In reviewing such comparative information, the County will be able to make its decision knowing the relative significance of the resource in question.
- e. Financial Impact. A determination that the retention of the natural area would cause financial hardship to the owner not offset by public interest in the site's preservation would be a determining factor in the County's decision.
- f. Public Benefit from the Proposed Change. A finding that the change is of substantial benefit to the County and cannot be accommodated feasibly elsewhere on the applicant's property would be a significant factor in the County's decision.
- 3. For Resources on Federally Managed Lands. The findings and conclusions of Baker County relative to a proposed alteration or demolition of a significant cultural/ historic/natural site/structure shall be forwarded to the appropriate federal agency as a recommendation.
- 4. For Resources Not Inventoried or Designated as 1B. For resources of unknown significance or resources not on the inventory, a local review will be conducted by BLM and USFS personnel, Oregon Department of Fish and Wildlife, State and/or college historians, and local museum and

Archived Applicable Criteria	Updated Applicable Criteria
	historical society members to evaluate the
	resource's comparative worth and make a recommendation as to whether a full public hearing is warranted.

Response: The amended text in BCZSO Chapter 710 is generally the same as previously written in the archived version of BCZSO analyzed with the ASC. The updates are renumbered and add clarity, but do not change the intent of the Historic, Cultural, and Natural Resources Protection standards, which remain the same for the Project. The Council previously found there are no resources of unknown significance, or resources not on the inventory which are located within the Analysis Area of the proposed transmission line. As detailed in this RFA 1 under Section 7.1.8, new surveys have occurred to determine the proposed amendment makes no changes that will alter the basis for the Council's earlier findings, or its conclusion that the Project will not likely result in an adverse impact to any historical, cultural and archaeological resources in the Analysis Area, and therefore the amendment request meets the requirement of the Historical, Cultural and Archaeological Resources Standard.

#### 7.1.3.9 New Applicable Substantive Criteria

The following section addresses new applicable substantive criteria that have been added to county land use plans since the ASC was prepared.

#### **Union County**

#### 3.04 Conditional Uses with General Review Criteria

In the A-2 Zone, the following uses and their accessory buildings and uses are permitted subject to county review under Article 24.03 Quasi-Judicial land use decision and the specific standards for the use set forth in Section 3.05, as well as the general standards for the zone and the applicable standards in Article 21.00 (Conditional Uses).

11. Utility facilities necessary for public service, including associated transmission lines as defined in Section 1.08 and wetland waste treatment systems, but not including commercial facilities for the purpose of generating electrical power for public use by sale or transmission towers over 200 feet in height as provided in Subsection 3.05.15

. .

#### 3.05 Use Standards

- 15. A utility facility that is necessary for public service
  - A. A utility facility is necessary for public service if the facility must be sited in the exclusive farm use zone in order to provide the service. To demonstrate that a utility facility is necessary, an applicant must show that reasonable alternatives have been considered and that the facility must be sited in an exclusive farm use zone due to one or more of the following factors:
    - (1) Technical and engineering feasibility;
    - (2) The proposed facility is locationally-dependent. A utility facility is locationally-dependent if it must cross land in one or more areas zoned for exclusive farm use in order to achieve a reasonably direct route or to meet unique geographical needs that cannot be satisfied on other lands;

- (3) Lack of available urban and non-resource lands;
- (4) Availability of existing rights of way;
- (5) Public health and safety; and
- (6) Other requirements of state and federal agencies.
- B. Costs associated with any of the factors listed in subparagraph A. of this paragraph may be considered, but cost alone may not be the only consideration in determining that a utility facility is necessary for public service. Land costs shall not be included when considering alternative locations for substantially similar utility facilities and the siting of utility facilities that are not substantially similar.
- C. The owner of a utility facility approved under paragraph A shall be responsible for restoring, as nearly as possible, to its former condition any agricultural land and associated improvements that are damaged or otherwise disturbed by the siting, maintenance, repair or reconstruction of the facility. Nothing in this paragraph shall prevent the owner of the utility facility from requiring a bond or other security from a contractor or otherwise imposing on a contractor the responsibility for restoration.
- D. The county shall impose clear and objective conditions on an application for utility facility siting to mitigate and minimize the impacts of the proposed facility, if any, on surrounding lands devoted to farm use in order to prevent a significant change in accepted farm practices or a significant increase in the cost of farm practices on surrounding farmlands.
- E. Utility facilities necessary for public service may include on-site and off-site facilities for temporary workforce housing for workers constructing a utility facility. Such facilities must be removed or converted to an allowed use under the A-1 Zone or other statute or rule when project construction is complete. Off-site facilities allowed under this paragraph are subject to Section 2.06 Conditional Use Review Criteria. Temporary workforce housing facilities not included in the initial approval may be considered through a minor amendment request. A minor amendment request shall have no effect on the original approval.

Response: As described in the ASC Exhibit K, proposed facility components within Union County's A-2 zone would include up to 6.1 miles of 500-kV transmission line and ancillary facilities, which based on 2001 and 2005 court decisions (see *Cox v. Polk County* and *Save our Rural Or. V. Energy Facility Siting Council,* respectively) the Certificate Holder maintains should be considered under the "utility facility necessary for public service." The Council previously found the Project is a utility facility necessary for public service that would be a permitted use in the A-2 zone. The proposed site boundary changes occur within the A-2 zone, which under the current standards are subject to county review under Section 3.05, as well as the applicable standards of Article 21.00 (Conditional Uses).

The standards of Section 3.05(15) mirror the standards of ORS 215.275, which the Certificate Holder went beyond what is required to demonstrate compliance with and included a county-specific alternatives analysis previously evaluated with the ASC. The proposed Union County site boundary changes, which are limited to access road design updates along the Approved Route, will be constructed of the same materials and components previously described in Exhibit B of the ASC, and would occur in similar habitat types, topography, and land uses to those previously considered. As such, the Council's previous determination that the ASC

complies with ORS 215.275 is applicable to RFA 1. GEN-LU-05 condition requires submission of Union County permits in accordance with UCZPSO. Therefore, the Council may rely on its previous findings and conditions, and the Proposed Site Boundary Additions will comply with these standards.

#### 5.04 Conditional Uses with General Review Criteria

In the A-4 Zone predominantly farmland lots and parcels shall comply with Section 5.06 Administrative Uses and predominantly forest land parcels may authorize the following uses and activities and their accessory buildings and uses subject to county review and the specific standards set forth in Article 21.00, as well as the general provision set forth by this ordinance.

21. New electric transmission lines with right of way widths of up to 100 feet as specified in ORS 772.210. New distribution lines (e.g., gas, oil, geothermal, telephone, fiber optic cable) with rights-of-way of 50 feet or less in width.

. . .

#### 5.06 Conditional Use Review Criteria

A use authorized by Section 5.04 of this zone may be allowed provided the following requirements or their equivalent are met. These requirements are designed to make the use compatible with forest operations and agriculture and to conserve values found on forest lands.

- The proposed use will not force a significant change in, or significantly increase the cost of, accepted farming or forest practices on agriculture or forest lands.
- The proposed use will not significantly increase fire hazard or significantly increase fire suppression costs or significantly increase risks to fire suppression personnel.
- A written statement recorded with the deed or written contract with the county or its
  equivalent is obtained from the land owner that recognizes the rights of adjacent and
  nearby land owners to conduct forest operations consistent with the Forest Practices
  Act and Rules for uses authorized in OAR 6660-006-0025 Subsection 5(c)

Response: Article 5.04(21) states that new electric transmission lines with right-of-way widths up to 100 feet are conditional uses with general review criteria. This definition applies the Project. As described in RFA 1, the Proposed Site Boundary Additions within Union County's A-4 zone would include access road design updates along the Approved Route in open rangeland (Figure 4-2, Maps 28 to 41). A summary of proposed road changes are outlined in Table 5.2-9. As such, the Proposed Site Boundary Additions are subject to county review under Section 5.06, as well as the applicable standards of Article 21.00 (Conditional Uses). The Conditional Use Review Criteria of Section 5.06 mirror OAR 660-006-0025(4)(q), which was evaluated in under OAR 660-006-0025(5) Uses Authorized In Forest Zones.

As stated in the ASC, while OAR 660-006-0025(4)(q) expressly refers only to transmission lines with up to a 100-foot right-of-way, the Oregon Supreme Court has concluded that the use category defined in OAR 660-006-0025(4)(q) also includes new electric transmission lines with right-of-ways greater than 100 feet because of that provision's specific reference to ORS 772.210 (regarding condemnation) (see *Save Our Rural Oregon v. EFSC*, 339 Or. 353, 375-76 (2005) [concerning the EFSC application of the COB Energy Facility LLC, and hereinafter referred to as COB]). ORS 772.210 relates to "Rights of Ways for Public Uses" and public utility condemnation authority. The Council imposed GEN-LU-12 to allow transmission line right-of-way in Goal 4 forest lands to no wider than 300 feet and found the proposed facility would not result in significant adverse impact to accepted forest practices nor result in a significant increase in the cost of accepted forest practices within the surrounding area.

To evaluate the significance of the removal of land from timber harvest potential, the Certificate Holder assessed the quantity of forest land lost compared to total forest land available (791,000 acres of Union County forested acres), resulting in approximately 530 acres lost (0.07 percent) in Union County. The Council found the proposed facility would not result in significant adverse impacts to accepted forest practices nor result in a significant increase in the cost of accepted forest practices within the surrounding area. Table 5.2-6 quantifies the acres of land disturbed during construction and operation in Union County, where 2.9 acres of land would be permanently converted to operations as a result of the Proposed Site Boundary Additions in Union County. This impact is a de minimus percentage of the total forest land available in Union County and the inability to use the land for forest purposes over the life of the facility is not significant. Therefore, the Council may rely on its previous findings and conditions, and the Proposed Site Boundary Additions will comply with these standards.

#### Baker County

410.03 Uses Permitted Through a Type II Procedure.

In the EFU Zone, the following uses and their accessory uses may be permitted when authorized in accordance with the provisions of Section 115.06.

#### E. Utility Facilities

- 2. Utility facilities necessary for public service, including associated transmission lines as defined in ORS 469.300 and wetland waste treatment systems, but not including commercial facilities for the purpose of generating electrical power for public use by sale or transmission towers over 200 feet high. To demonstrate that a utility facility is necessary, as described in ORS 215.283(1)(c), an applicant must: ]
  - a. Show that reasonable alternatives have been considered and that the facility must be sited in an Exclusive Farm Use Zone due to one or more of the following factors:
    - i. Technical and engineering feasibility;
    - ii. The proposed facility is locationally-dependent. A utility facility is locationally-dependent if it must cross land in one or more areas zoned for exclusive farm use in order to achieve a reasonably direct route or to meet unique geographical needs that cannot be satisfied on other lands;
    - iii. Lack of available urban and non-resource lands:
    - iv. Availability of existing rights-of-way;
    - v. Public health and safety;
    - vi. Other requirements of state and federal agencies
- b. Costs associated with any of the factors listed in Section 410.03(D)(1)(a) may be considered; however, cost alone may not be the only consideration in determining that a utility facility is necessary for public service. Land costs shall not be included when considering alternative locations for substantially similar utility facilities. The Land Conservation and Development Commission shall

<sup>&</sup>lt;sup>17</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 266 (September 2022)

<sup>&</sup>lt;sup>18</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 270 (September 2022)

determine by rule how land costs may be considered when evaluating the siting of utility facilities that are not substantially similar.

- c. The owner of a utility facility approved under this Section shall be responsible for restoring, as nearly as possible, to its former condition any agricultural land and associated improvements that are damaged or otherwise disturbed by the siting, maintenance, repair or reconstruction of the facility. Nothing in this Section shall prevent the owner of the utility facility from requiring a bond or other security from a contractor or otherwise imposing on a contractor the responsibility for restoration.
- d. The governing body of the county or its designee shall impose clear and objective conditions to mitigate and minimize the impacts of the proposed facility, if any, on surrounding lands devoted to farm use in order to prevent a significant change in accepted farm practices or a significant increase in the cost of farm practices on the surrounding farmlands.
- e. The provisions of subsections (2) to (5) of this Section do not apply to interstate natural gas pipelines and associated facilities authorized by and subject to regulation by the Federal Energy Regulatory Commission.

. . .

#### 410.05 Standards for Certain Uses in the EFU Zone

- B. As specified above, certain uses in the EFU Zone shall demonstrate that the following criteria area met:
  - 1. The use will not force a significant change in accepted farming practices on surrounding lands devoted to farm or forest use; and
  - 2. The use will not significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use.

Response: The Certificate Holder established in the ASC and throughout this RFA 1 that the Project classifies as a facility necessary for public service. The criteria for conditional uses previously evaluated in the ASC establish a higher level of review (Type III) than what is required for administrative uses (Type II). In Baker County, a Type II administrative permit application for utility facilities necessary for public service must demonstrate compliance with BCZSO 410.03(E)(2), which mirror the standards of ORS 215.275 evaluated in the ASC. The ASC also addressed OAR 660-006-0025(5)(a)-(b), which mirror BCZSO Chapter 410.05(B)(1)-(2), to demonstrate the Project will not force a significant change in, or significantly increase the cost of, accepted farming practices in the areas surrounding the Project in forest lands. The Council previously determined that the Project satisfied the requirements of ORS 215.275 19 and OAR 660-006-0025. <sup>20</sup> The proposed changes to the site boundary would generally be in proximity to the approved site boundary, be constructed of the same materials and components previously described in Exhibit B of the ASC, and would occur in similar habitat types. topography, and land uses to those previously considered. The proposed site boundary changes do not change conditions that would alter the Council's previous determination that the ASC complies Section ORS 215.275 or OAR 660-006-0025, and therefore, the Council may

<sup>&</sup>lt;sup>19</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 244-259 (September 2022)

<sup>&</sup>lt;sup>20</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 261-272 (September 2022)

conclude that RFA 1 complies with the applicable standards of BCZSO Chapter 410 Exclusive Farm Use Zone.

Chapter 510 Residential Zones

510.03 Recreation Residential Zone (RR-2).

- C. Uses Permitted Through a Type III Procedure. In the RR-2 Zone, the following uses may be permitted when authorized in accordance with the provisions of Section 115.07. These uses shall also require a Conditional Use Permit as described in Chapter 210.
  - 2. Uses
  - a. Major utility facilities as defined in Chapter 150.

**Response**: The definition of major utility facility in Chapter 150 includes power transmission lines, which indicates an electrical transmission line project would be considered a conditional use in the RR-2 zone. Facility components within 0.5-mile of the RR-2 zone include an accessory use to the proposed utility facility, including new access roads. The Council previously found the Project satisfied the BCZSO conditional use approval standards.<sup>21</sup> The BCZSO has been amended, but standards addressed in the ASC for conditional uses are not substantially different from the amended BCZSO Conditional Use approval criteria in the newly adopted Chapter 210.04(A)(1-6). Existing Site Certificate Conditions ensure compliance with the standard. The Council imposed Site Certificate Condition PRE-PS-02, which requires the Certificate Holder to submit a Transportation and Traffic Plan for review and approval by the Department in consultation with the affected county. The condition also requires that, through county-issued road-related permits, the Certificate Holder execute a formally binding agreement with the county for use of and potential impacts to roads during construction activities. In addition, Site Certificate Condition GEN-LU-07 requires the Certificate Holder to obtain applicable permits required by Baker County ordinances. If after commencement of construction the Certificate Holder determines additional County-approved permits are required, the Certificate Holder will provide to the department a copy of those additional permits. Moreover, the substantially modified roads would provide road improvements that would support livability, value, and access within the area. The Certificate Holder has not identified any "assets of particular interest to the community" that would be impacted by the location of the proposed roads. Due to the limited potential impacts resulting during construction and operation of facility components within 0.5 mile of RR-2 zoned land, RFA 1 satisfies BCZSO Chapter 210.04.(A)(1-6) approval standards.

#### 7.1.3.10 Directly Applicable Statutes and Administrative Rules

#### ORS 215.283 and ORS 215.275

The Council previously determined that the Project satisfied the requirements of ORS 215.283 and ORS 215.275. The provisions of ORS 215.283 and ORS 215.275 have not changed since the original ASC was submitted on September 28, 2018. The Certificate Holder demonstrated the Project is permitted outright in Goal 3 EFU lands because it is a utility facility necessary for public service under ORS 215.283(1)(c)(A) and ORS 215.275. In compliance with ORS 215.275, IPC will both minimize impacts to accepted farming practices, and mitigate

<sup>&</sup>lt;sup>21</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 218 (September 2022)

<sup>&</sup>lt;sup>22</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 244-259 (September 2022)

temporary and permanent impacts where necessary, in accordance with the measures outlined in the Agricultural Lands Assessment provided in the original ASC (Attachment K-1 of the Final Order on the ASC). The Proposed Site Boundary Additions would generally be in proximity to the approved site boundary, be constructed of the same materials and components previously described in Exhibit B of the ASC, and would occur in similar habitat types, topography, and land uses to those previously considered. GEN-LU-11 requires the Certificate Holder to finalize, prior to construction, an Agricultural Land Assessment and Mitigation Plan, which implements mitigation measures and monitoring during construction. Therefore, the previous evaluation remains consistent with the Proposed Site Boundary Additions, and the Council may rely on its previous findings and conditions that the Project complies with ORS 215.283 and ORS 215.275.

#### ORS 215.276

The Council previously determined that the Project satisfied the requirements of ORS 215.283 and ORS 215.276 based upon inclusion of the notification requirements with the Agricultural Assessment and Mitigation Plan (Attachment K-1 of the Final Order on the ASC, imposed in Site Certificate Condition GEN-LU-11), the Project satisfies the requirements of ORS 215.276. The provisions of ORS 215.276 have not changed since the original ASC was submitted on September 28, 2018, and the Certificate Holder does not propose any changes to Land Use GEN-LU-11. The Proposed Site Boundary Additions would generally be in proximity to the approved site boundary, be constructed of the same materials and components previously described in Exhibit B of the ASC, and would occur in similar habitat types, topography, and land uses to those previously considered. Therefore, the previous evaluation remains consistent with the Proposed Site Boundary Additions, and the Council may rely on its previous findings and conditions that the Project complies with the ORS 215.276.

#### OAR 660-006-0025 (Forest Zone Requirements)

Exhibit K of the ASC demonstrated that the Project will not force significant changes in farm practices or cause significant increases in the costs of accepted farm practices on surrounding lands devoted to farm use. The Council previously determined that the Project satisfied the requirements of OAR 660-006-0025.24 The Proposed Site Boundary Additions within Union County's A-4 zone would include access road design updates along the Approved Route in open rangeland (Figure 4-2, Maps 28 to 41). As such, the proposed site boundary changes are subject to county review under OAR 660-006-0025(4)(q), which was evaluated under OAR 660-006-0025(5) Uses Authorized In Forest Zones. As stated above, approximately 2.9 acres of land (0.0004 percent) would be permanently converted to operations as a result of site boundary changes within Union County. This impact is a de minimus percentage of the total forest land available in Union County and the inability to use the land for forest purposes over the life of the facility is not significant. In addition, IPC has prepared a Wildfire Mitigation Plan (Attachment 7-7) that has been filed with the Public Utility Commission of Oregon in compliance with OAR chapter 860, division 300. This plan would apply to the entire Project, including the proposed changes in RFA 1. Therefore, the Council may conclude that the Proposed Site Boundary Additions will not significantly increase fire hazard or significantly increase fire suppression costs or significantly increase risks to fire suppression personnel, as the Project is subject to a wildfire protection plan approved by the Public Utility Commission. Therefore, the previous evaluation remains consistent with the Proposed Site Boundary Additions, and the Council may

<sup>&</sup>lt;sup>23</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 260-261 (September 2022)

<sup>&</sup>lt;sup>24</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 261-272 (September 2022)

rely on its previous findings that the Project complies with the Forest Zone requirements of OAR 660-006-0025.

#### 7.1.3.11 Statewide Planning Goals

The Council previously determined that the Project satisfied the applicable criteria of OAR 345-022-0030, which implements ORS 469.504(1)(b). The ASC described each of the 19 statewide planning goals and detailed how the Project complies with each goal. The proposed change with RFA 1 involve several site boundary changes across the entire span of the Project. The Proposed Site Boundary Additions would generally be in proximity to the approved site boundary, be constructed of the same materials and components previously described in Exhibit B of the ASC, and would occur in similar habitat types, topography, and land uses to those previously considered. Therefore, the changes proposed in RFA 1 will not create significant new impacts affecting those resources and interests protected by the Council's siting standards and the Council can find that the Proposed Site Boundary Additions will comply with the statewide planning goals adopted by the Land Conservation and Development Commission.

#### 7.1.3.12 Goal 4 Exception

The Council previously determined that the Project satisfied the applicable criteria of OAR 345-022-0030, which implements ORS 469.504(1)(b). <sup>26</sup> The Proposed Site Boundary Additions do not affect the Council's previous finding that an exception to Goal 4 is justified. As described in the assessment of applicable local land use criteria, the Council previously imposed several conditions (GEN-LU-12) that would limit the right-of-way in Goal 4 forest lands to no wider than 300 feet. The Proposed Site Boundary Additions on forest lands are limited to access road design updates along the Approved Route and permanent impacts represent a de minimus percentage of the total forest land available in Union County. The existing conditions imposed by the Council to minimize potential impacts to forest practices will apply to the Proposed Site Boundary Additions. Therefore, the Council may conclude that the Proposed Site Boundary Additions, do not affect the Council's previous finding that an exception to Goal 4 is justified.

#### 7.1.3.13 Federal Land Management Plans

National Environmental Policy Act (NEPA) review for the Project will include an evaluation of the Project's consistency with the applicable federal land management plans, which, per ORS 469.370(13), requires the Council to review the application, to the extent feasible, in a manner that is consistent with and does not duplicate review under NEPA. In the ASC Exhibit K, the Certificate Holder provided an evaluation of compliance with Federal Land Management Plans including Wallowa-Whitman National Forest Land and Resource Management Plan, Bureau of Land Management (BLM) Vale District Resource Management Plan, BLM Baker Resource Management Plan, BLM Southeastern Oregon Resource Management Plan, and Sage-Grouse Amendments to Resource Management Plans. The Wallowa-Whitman National Forest Land and Resource Management Plan was recently amended after the Final Record of Decision (USFS 2018) was issued to authorize the Project and related actions on National Forest System lands managed by the Wallowa-Whitman National Forest. In January 2021, BLM issued a record of decision approving amendments to its resource management plans in Oregon to provide certain conservation measures for Greater sage-grouse. The ASC's Exhibit K noted the Project was exempt from the new conservation measures set forth in prior

<sup>&</sup>lt;sup>25</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 272-280 (September 2022)

<sup>&</sup>lt;sup>26</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 280-287 (September 2022)

amendments; instead, conservation measures for sage-grouse were analyzed through the Project's NEPA process (see Oregon Greater Sage-Grouse Approved Resource Management Plan Amendment). The Proposed Site Boundary Additions would generally be in proximity to the approved site boundary, be constructed of the same materials and components previously described in Exhibit B of the ASC, and would occur in similar habitat types, topography, and land uses to those previously considered. Therefore, the previous evaluation remains consistent with the Proposed Site Boundary Additions, and the Council may rely on its previous findings that the Project complies with the applicable Federal Land Management Plans.

In conclusion, the Proposed Site Boundary Additions will comply with Land Use conditions previously imposed on the Project (see Table 1). For the reasons discussed above, the Proposed Site Boundary Additions will comply with the Land Use Standard.

#### 7.1.4 Protected Areas - OAR 345-022-0040

The Council previously concluded that the Project complies with the Protected Areas Standard.<sup>27</sup> The updated Protected Areas Standard requires the Council to find that the design. construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to a protected area designated on or before the date the ASC or request for amendment was determined to be complete under OAR 345-015-0190 or 345-027-0363, as defined by OAR 345-022-0040. Per Exhibit L of the ASC, there were 80 defined protected areas within the previously defined 20-mile analysis area. Based on the Certificate Holder's review of protected areas listed in the updated OAR 345-001-0010(49), there are eight new protected areas located within 20 miles of the proposed updated site boundary (analysis area) that were not previously addressed (see Figure 7-5, and Attachment 7-2, Table 1). Additionally, 11 previously identified protected areas (Eagle Creek [Recreational], Minam River [Wild], The Minam Scenic Waterway, North Fork John Day River [Recreational], North Fork John Day River [Wild], Cold Springs National Wildlife Refuge, McNary National Wildlife Refuge, Hat Rock State Park, Columbia Basin – Power City Wildlife Area, Bridge Creek Wildlife Area, and Eastern Oregon Agricultural Research Station) are not within the RFA 1 analysis area. A total of 77 protected areas occur within the RFA 1 analysis area. Note that this analysis does not address the previously approved site boundary and solely addresses the proposed site boundary changes in RFA 1.

The significance of impacts on protected areas from water use and wastewater, traffic, noise, visual viewshed alteration, and other impacts are disclosed in Exhibit L and the changes proposed by RFA 1 will not contribute any additional significant impacts to those already considered<sup>28</sup> (see Figure 7-6 and Attachment 7-2, Tables 1 and 2 for a full description). All newly identified protected areas within the RFA 1 analysis area will not serve as sources for water or experience any kind of wastewater disposal impacts due to continued proper wastewater containment; any traffic impacts from construction will be short term and operational impacts will be negligible due to infrequent maintenance and inspections required at the Project; all eight of the new protected areas are outside of the previously determined maximum distance of one-half of a mile to experience construction noise impacts, and noise impacts from operations will be intermittent (due to infrequent maintenance and inspections) or otherwise indistinguishable from existing background noise; and six of the eight new protected areas are outside of the previously determined maximum distance of 5 miles for non-forested areas and

<sup>27</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 326 (September 2022)

<sup>&</sup>lt;sup>28</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 296-325 (September 2022)

10 miles for forested areas to receive visual impacts<sup>29</sup> (see Figure 7-6 and Attachment 7-2, Table 2).

Additionally, the proximity of a majority of the previously identified protected areas to the RFA 1 analysis area either remained the same as previously described in the ASC or increased, thus the impacts will be less than or equal to what was previously approved (Attachment 7-1, Tables 1 and 2). For the 13 protected areas that decreased in proximity to the Project, the distances changed by a maximum of 2.3 miles and minimum of 0.1 miles, with 10 of the 13 protected areas decreasing by 0.4 miles or less, thus impacts were found to be similar to what was previously approved for these areas. Twelve of the 13 previously identified protected areas that decreased in proximity to the analysis area are closest in proximity to road design changes proposed by RFA 1 as opposed to the proposed three route realignments, The Lindsay Prairie Preserve/State Natural Heritage Area is the only previously identified protected area (that decreased in proximity to the analysis area) that is closest in proximity to one of the proposed three route realignments proposed by RFA 1, specifically the Little Juniper Canyon Alternative. It is determined that even with the proposed changes, water use and wastewater impacts, traffic impacts, noise impacts, and visual impacts will remain comparable to what was previously approved.<sup>30</sup> See Attachment 7-2, Tables 1 and 2 for a full assessment of impacts at each protected area. Continued implementation of the following Site Certificate Conditions will ensure that impacts to protected areas will be minimized: GEN-PA-01 (Ladd Marsh Wildlife Area agency coordination). GEN-PA-02 (avoidance of Ladd Marsh Wildlife Area if Morgan Lake alternative route is chosen), GEN-SR-03 (National Historic Oregon Trail Interpretive Center

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<sup>&</sup>lt;sup>29</sup> The Glass Hill Preserve/State Natural Heritage Area and the Boardman Research Natural Area are less than 5 miles from portions of the Proposed Site Boundary Additions; however, visual impacts are anticipated to be less than significant due to a combination of factors, including the presence of existing power infrastructure (e.g., 69-kilovolt Bonneville Power Administration transmission line, wind and solar renewable energy facilities), views of the Proposed Site Boundary Additions are from mostly neutral or elevated vantage points, the localization of impacts, no management for scenic quality, and public access is not permitted. The public is excluded from the Boardman Research Natural Area (per personal communication between Kristen Gulick, Tetra Tech and Kelly Wallis, The Nature Conservancy, July 18, 2022) and likely excluded from the Glass Hill Preserve/State Natural Heritage Area (per personal communication between Kristen Gulick, Tetra Tech, and Lindsey Wise, Oregon State University, Institute for Natural Resources, July 13, 2022). Some medium intensity visual impacts could occur at the Glass Hill Preserve/State Natural Heritage Area due to the structures introducing moderate visual contrast and appearing co-dominant with the landscape and existing infrastructure; note that the closest Proposed Site Boundary Alterations as proposed by RFA 1 are related to access road changes as opposed to the three route realignments, which will present no additional/minimal visual impacts to what was approved in the ASC. See Attachment 7-2, Table 2 for the full visual analysis. Note that both protected areas are closest/crossed in proximity to originally approved, unchanged portions of the site boundary as opposed to the site boundary realignments proposed by RFA 1 (see Figure 7-5). The Glass Hill Preserve/State Natural Heritage Area was added post submittal of the ASC, listed under the updated OAR 345-001-0010(49)(I). Alternative routes were studied as part of the ASC and in compliance with the updated OAR 345-022-0040(2)(a), the approved Morgan Lake Alternative route that passes through the Glass Hill Preserve/State Natural Heritage Area was ultimately selected as the least impact option. The Boardman Research Natural Area was present prior to submittal of the ASC and was added to this analysis as a result of updates to the previous OAR 345-022-0040(1)(o) and new OAR 345-001-0010(49)(i), which previously excluded the protected area from analysis due to management by the Department of Defense and not BLM. Alternative routes were studied as part of the ASC and in compliance with the updated OAR 345-022-0040(2)(a), the approved West of Bombing Range Road Alternative 1 route that passes adjacent to the Boardman Research Natural Area was ultimately selected as the least impact option. See Attachment 7-2, Table 1 for the full impact analysis.

<sup>&</sup>lt;sup>30</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 296-325 (September 2022)

visual impact reduction), GEN-SR-04 (Birch Creek Area of Critical Environmental Concern visual impact reduction), GEN-HC-01 (Oregon Trail/National Historic Trail resource impact avoidance), GEN-HC-02 (implementation of Historic Properties Management Plan), PRE-PS-02 (traffic management and control measure implementation), and GEN-PS-01 (controlled helicopter use within 2 miles of the protected or recreation areas).

Note that contact information for the applicable land management agencies as well as reference to individual subsections under OAR 345-001-0010(49) have been added for each identified protected area per updates to OAR 345-021-0010(I)(A) (see Attachment 7-2, Table 1).

The Proposed Site Boundary Additions do not alter the basis for the Council's previous findings, or its conclusion that the Project will not likely result in a significant adverse impact to any Protected Areas in the analysis area. Therefore, the Proposed Site Boundary Additions meet the requirement of the Protected Areas Standard.

#### 7.1.5 Fish and Wildlife Habitat – OAR 345-022-0060

The Council's Fish and Wildlife Habitat Standard requires the Council to find that the design, construction, and operation of a facility is consistent with the Oregon Department of Fish and Wildlife's (ODFW) habitat mitigation goals and standards, as set forth in OAR 635-415-0025. The Council previously found that the Project complies with the Fish and Wildlife Habitat Standard. The following describes the Certificate Holder's review of the effects on fish and wildlife habitat from the Proposed Site Boundary Additions and any additional information required to comply with the Fish and Wildlife Habitat Standard.

#### 7.1.5.1 Background Review

IPC reviewed ODFW's current list of sensitive species (ODFW 2021a), updated databases from the Oregon Biodiversity Information Center (ORBIC 2021), U.S. Forest Service and BLM (USFS 2022; BLM 2022), and StreamNet (2021) to inform which state sensitive species have the potential to occur in or near the proposed changes. IPC also reviewed existing landcover data (USGS 2011) to determine the habitat types that occur in the proposed changes.

#### 7.1.5.2 Surveys

IPC has performed biological surveys on the Proposed Site Boundary Additions following the protocols presented in Attachment P1-2 of Exhibit P1 of the ASC and per the Site Certificate conditions PRE-FW-01 and PRE-FW-02. Table 7.1-11 includes a list of surveys, the proposed changes at which the surveys are being performed, and the current status of those surveys.

Washington ground squirrel (WAGS; *Urocitellus washingtoni*), pygmy rabbit (*Brachylagus idahoensis*), great gray owl (*Strix nebulosa*) and flammulated owl (*Psiloscops flammeolus*), and northern goshawk (*Accipiter gentilis*) and American three-toed woodpecker (*Picoides dorsalis*) surveys have been partially completed for the Proposed Site Boundary Additions. Terrestrial visual encounter surveys, rare plant surveys, noxious weed surveys, and wetland surveys of the proposed changes are also partially completed. Most surveys are considered ongoing due to right of entry; however, surveys will be completed on all proposed changes prior to construction. Survey findings are incorporated in this RFA 1 where available.

Table 7.1-11. Biological Resources Surveys

Survey Type	Survey Location	Status
Washington ground squirrel	Little Juniper Canyon Alternative, Approved Route access road changes in Morrow County	Ongoing (Attachment 7-3)
Terrestrial Visual Encounter Survey	All proposed changes.	Ongoing
Pygmy Rabbit	Durbin Quarry Alternative, Approved Route access road changes in Baker County	Ongoing (Attachment 7-4)
Rare Plants	All proposed changes.	Ongoing
Noxious Weeds	All proposed changes.	Ongoing
Great Gray Owl and Flammulated Owl	Approved Route access road changes in Union County	Ongoing
Northern Goshawk and American Three-toed Woodpecker	Approved Route access road changes in Union County	Ongoing
Raptor Nest	All proposed changes.	IPC will perform pre- construction raptor nest surveys during the breeding season prior to scheduled construction (anticipated in 2023).
Wetland	All proposed changes.	Ongoing

#### 7.1.5.3 Findings

IPC has performed habitat categorization per OAR 635-415-0025 by using an existing landcover dataset (USGS 2011) as the basis for habitat mapping within the site boundary of the proposed changes. IPC also used the findings of the WAGS surveys and ODFW elk and mule deer winter range designations to inform the habitat categorization. The habitat categorization followed the process described in Attachment P1-1 of the ASC.

A single WAGS colony was identified within the survey area associated with the Little Juniper Canyon Alternative in Morrow County. No Category 1 WAGS habitat occurs within the proposed site boundary changes. Category 2 WAGS habitat (within 1.5 kilometers of colony boundary) is included in the habitat categorization of the site boundary of the proposed changes. No pygmy rabbits or their sign were observed during surveys. No owl, goshawk, or woodpecker nests were identified during surveys. Raptor nest surveys will be performed during the breeding season prior to construction.

Mule deer winter range and elk winter range are both considered Category 2 habitat. Two of the three proposed alternatives are in mule deer and elk winter range: True Blue Gulch and Durbin Quarry. Several of the Approved Route access road changes occur in elk and mule deer winter range in Umatilla, Union, Baker, and Malheur counties.

Table 7.1-12 shows the habitat categorization for the proposed changes. Figure 7-7 and Figure 7-8 contain maps showing the habitat categorization for the site boundary of the proposed changes.

Table 7.1-12. Habitat Categorization of RFA 1 Site Boundary

	90%	Habi	tat Catego	ory		
Proposed Change	1	2	3	5	6	Total
Little Juniper Canyon A	Alternative					78.7
Agriculture / Developed			(2)		35.8	34.6
Shrubland		42.8	63			42.7
<b>True Blue Gulch Altern</b>	ative					422.8
Bare Ground		8.2	ĺ			8.2
Forest / Woodland		116.6				116.6
Grassland		18.3				18.3
Riparian Vegetation		2.5				2.5
Shrubland		277.0				277.0
<b>Durbin Quarry Alternat</b>	ive					130.0
Agriculture / Developed					1.4	1.4
Grassland		9.3				9.3
Shrubland		119.3				119.3
<b>Approved Route Acces</b>	s Road Ch	anges				404.5
Agriculture / Developed			į.		58.1	58.1
Bare Ground		10.5	0.6			11.1
Forest / Woodland		9.6	37.4			47.0
Grassland		70.6	1.7			72.3
Open Water		3.2				3.2
Riparian Vegetation		0.2	0.5	•		0.7
Shrubland		178.9	33.2			212.2

Review of the most recent ODFW sensitive species list and species occurrence datasets would not warrant any changes to the previously prepared Table P1-5 in Exhibit P1 of the ASC that indicates which sensitive species are likely to occur near the Project. The discussion of the nature and duration of potential impacts to fish and wildlife in Exhibit P1 of the ASC is applicable to the Proposed Site Boundary Additions.

Quantification of acreages of temporary and permanent impacts by habitat type and category of the proposed changes are included in Table 7.1-13 and will be incorporated in the final habitat mitigation plan.

Table 7.1-13. Temporary and Permanent Impact Calculations

		Habitat Category						
Proposed	2		3		5		6	
Change	Temp	Perm	Temp	Temp Perm		Perm	Temp	Perm
Little Juniper Cany	on Alterna	tive						
Agriculture / Developed								
Shrubland	6.6	1.6					7.4	0.9
Subtotal	6.6	1.6					7.4	0.9
True Blue Gulch Al	Iternative							
Forest / Woodland	0.6	0.0						
Grassland	8.7	1.7						
Riparian Vegetation	3.1	0.9						
Shrubland	58.4	12.5						
Subtotal	70.8	15.1					Į.	

	Habitat Category								
Proposed	2		3	3		5		3	
Change	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm	
<b>Durbin Quarry Alte</b>	rnative								
Agriculture / Developed							0.5		
Grassland	1.8	0.4							
Shrubland	28.9	3.7							
Subtotal	30.7	4.1					0.5		
Approved Route Ad	cess Roa	d Changes	3						
Agriculture / Developed							9.1	5.3	
Bare Ground	2.0	0.9	0.1	0.1					
Forest / Woodland	1.5	1.3	6.6	2.6					
Grassland	12.6	6.6	0.2	0.2					
Open Water	1.0	0.5							
Riparian Vegetation	0.0	0.0							
Shrubland	32.6	16.3	5.6	2.7					
Subtotal	2.0	0.9	0.1	0.1			9.1	5.3	
Grand Total	157.7	46.4	12.5	5.5			17.0	6.2	

The Durbin Quarry Alternative and several Approved Route access road changes occur in greater sage-grouse (*Centrocercus urophasianus*) habitat. Greater sage-grouse habitat designations are defined in Exhibit P-2 of the ASC. The Durbin Quarry Alternative and some Approved Route access road changes in Baker County occur in Core Area and Low Density habitat. The types of impacts on sage-grouse and their habitat associated with the changes proposed in RFA 1 would be similar to those discussed in Exhibit P-2 of the ASC.

The proposed changes that occur in elk winter range would result in the types of impacts discussed in Exhibit P-3 of the ASC.

#### 7.1.5.4 Conclusion

Ground-disturbing activities will be avoided in WAGS Category 1 habitat (within 785 feet of the colony boundary) per condition CON-TE-01. Similarly, ground-disturbing activities will not occur in elk or mule deer winter range from December 1 to March 31 per condition CON-FW-01 (with exceptions) and ground disturbing activities will not occur within the seasonal restriction areas associated with active raptor nests per condition CON-FW-04 (with exceptions). Acreages of temporary and permanent impacts by habitat type and category will be incorporated in the final habitat mitigation plan per condition GEN-FW-04. All work will be performed in accordance with the draft Reclamation and Revegetation Plan (Attachment P1-3 of the Final Order), draft Vegetation Management Plan (Attachment P1-4 of the Final Order), and draft Noxious Weed Plan (Attachment P1-5 of the Final Order), which will be finalized prior to construction per conditions GEN-FW-01, GEN-FW-02, and GEN-FW-03.

The Proposed Site Boundary Additions that occur in greater sage-grouse habitat would be evaluated in a final Sage-Grouse Habitat Mitigation Plan prior to construction per condition PRE-FW-03.

The Proposed Site Boundary Additions that occur in elk habitat would be evaluated with the rest of the Project in a final Habitat Mitigation Plan.

The Proposed Site Boundary Additions that would require fish passage consideration would be addressed in a final Fish Passage Plan in consultation with ODFW per condition GEN-FP-01.

Therefore, based on the information provided and the conditions imposed on the Project, the Council may conclude that the Proposed Site Boundary Additions will comply with the Fish and Wildlife Habitat standard.

#### 7.1.6 Threatened and Endangered Species – OAR 345-022-0070

The Council previously found the Certificate Holder has demonstrated an ability to construct, operate, and retire the Project in compliance with Council standards and conditions of the Site Certificate, including the Threatened and Endangered Species Standard (OAR 345-022-0070). The Certificate Holder's assessment of the Project's compliance with the Threatened and Endangered Species Standard was included as Exhibit Q of the ASC. The following describes the Certificate Holder's review of the effects on threatened and endangered species from the Proposed Site Boundary Additions.

#### 7.1.6.1 Background Review

IPC reviewed ODFW's Threatened, Endangered, and Candidate Fish and Wildlife Species list (ODFW 2021b) and ODA's Threatened, Endangered, and Candidate Plant Species list (ODA 2022) to determine which species are currently listed under the Oregon Endangered Species Act (ORS 496.171 – 496.192). Additionally, IPC reviewed updated databases from the Oregon Biodiversity Information Center (ORBIC 2022), U.S. Forest Service and BLM (USFS 2022; BLM 2022), and StreamNet (2022) to inform which Threatened and Endangered species have the potential to occur in or near the proposed changes.

Species with the potential to occur in or near the proposed changes include WAGS, Snake River Chinook Salmon (Spring/Summer; *Oncorhynchus tshawytscha*), and several threatened and endangered plant species listed in Table 7.1-14. The background review did not identify any threatened or endangered species associated with RFA 1 that were not previously addressed in the ASC.

Several known occurrences of WAGS tracked by the Oregon Biodiversity Information Center overlap the Little Juniper Canyon Alternative and four proposed changes to the Approved Route access roads in Morrow County. The occurrences which overlap the Little Juniper Canyon Alternative and three of the proposed changes to the Approved Route access roads are historical and were last observed in 1987 (prior to IPC's observations nearby but non-overlapping the Little Juniper Canyon Alternative in 2022). The occurrence overlapping the fourth proposed change to the Approved Route access roads was last observed in 2011 (however IPC surveyed the entirety of this proposed change to site boundary in 2022 and did not find any active colonies).

Several known occurrences of threatened and endangered plant species overlap the changes proposed in RFA 1. Snake River goldenweed (*Pyrrocoma radiata*) is an endangered plant species, and two known occurrences overlap the Durbin Quarry Alternative and two additional proposed changes to other access roads in Baker County (ORBIC 2022; BLM 2022). One occurrence of Lawrence's milkvetch (*Astragalus collinus* var. *laurentii*) overlaps four of the proposed changes to other access roads in Morrow County; however, this occurrence was last observed in 1976 (ORBIC 2022).

Additionally, numerous other known occurrences of threatened and endangered plant species overlap the analysis area (site boundary buffered by a half-mile) with the changes proposed in

RFA 1 including Snake River goldenweed, Lawrence's milkvetch, and Cronquist's stickseed (*Hackelia cronquistii*). Several other plant species have recorded observations under 5 miles from the analysis area and are presented below in Table 7.1-14.

No streams bearing Snake River Chinook salmon (Spring/Summer) overlap the proposed changes to the site boundary. The only record of Snake River Chinook salmon (Spring/Summer) that overlaps the analysis area occurs in the Grande Ronde River about a third of mile from a proposed change to an access road in Union County.

Table 7.1-14. State Listed Threated and Endangered Species Potentially Present within the Analysis Area

Туре	Species	Location	Counties	State Status	Justification
Wildlif e	Washington ground squirrel (Urocitellus washingtoni)	Little Juniper Canyon Alternative	Morrow	Endangered	Known records in analysis area
Fish	Snake River Spring/Summe r Chinook Salmon (Oncorhynchu s tshawytscha)	Approved Route access road changes in Union County	Union	Threatened	Nearest record is within the analysis area
Plant	Lawrence's milkvetch (Astragalus collinus var. laurentii)	Little Juniper Canyon Alternative; Approved Route access road changes in Morrow and Umatilla Counties	Morrow, Umatilla	Threatened	Habitat occurs within analysis area; nearest occurrence overlaps analysis area
Plant	Mulford's milkvetch (Astragalus mulfordiae)	Approved Route access road changes in Malheur County	Malheur	Endangered	Nearest occurrence is within 5 miles of the analysis area
Plant	Smooth mentzelia ( <i>Mentzelia</i> <i>mollis</i> )	Approved Route access road changes in Malheur County	Malheur	Endangered	Nearest occurrence is within 5 miles of the analysis area
Plant	Cronquist's stickseed (Hackelia cronquistii)	Durbin Quarry Alternative; Approved Route access road changes in Baker and Malheur Counties	Baker, Malheur	Threatened	Known occurrence within analysis area
Plant	Oregon semaphore grass ( <i>Pleuropogon</i> oregonus)	Approved Route access road changes in Union County	Union	Threatened	Nearest occurrence is within 5 miles of the analysis area

Type	Species	Location	Counties	State Status	Justification
Plant	Snake River goldenweed ( <i>Pyrrocoma</i> radiata)	Durbin Quarry Alternative; True Blue Gulch Alternative; Approved Route access road changes in Baker and Malheur Counties	Baker, Malheur	Endangered	Known occurrence within the analysis area
Plant	Howell's spectacular thelypody (Thelypodium howellii ssp. spectabilis)	Approved Route access road changes in Baker and Union Counties	Baker, Union	Endangered	Nearest occurrence is within 5 miles of the analysis area

#### 7.1.6.2 Surveys

IPC performed surveys for WAGS within a 1,000-foot buffer of the site boundary in suitable habitat (survey area) in the Little Juniper Canyon Alternative and numerous proposed changes to other access roads in Morrow County in April and May 2022 (Attachment 7-3). A 1,000-foot buffer on the site boundary was surveyed because ODFW recommends a 785-foot buffer in continuous suitable habitat around WAGS colonies as an avoidance area for energy development projects. Small portions of the survey area were not able to be fully surveyed due to right of entry on some private lands and because the proposed changes to the site boundary for the RFA 1 were finalized after the competition of the 2022 field season.

Threatened and endangered plant species surveys have been completed at the Little Juniper Canyon Alternative. The Durbin Quarry Alternative is about 90 percent surveyed and the True Blue Gulch Alternative has yet to be surveyed. About 20 percent of the Approved Route access road changes spread throughout Baker, Malheur, Morrow, Union and Umatilla counites have been surveyed. Threatened and endangered plant species surveys will be completed prior to construction. Table 7.1-15 summarizes the surveys performed for threatened and endangered species.

Steelhead salmon, rainbow (redband) trout, and Snake River Spring/Summer Chinook Salmon are the only salmonids known to inhabit the streams within the analysis areas. No streams or rivers (Grande Ronde River) bearing Snake River Spring/Summer Chinook will be affected by the proposed changes to the site boundary in Union County. Fish presence was previously determined in the Fish Habitat and Stream Crossing Assessment Summary Report (Attachment P1-7B of the ASC). IPC will update the fish presence determinations for the Project as part of preparing a final Fish Passage Plan per condition GEN-FP-01.

Table 7.1-15. Status and Results of Surveys by Proposed Change

Section	Type	Status	Results	County
Little Juniper Canyon Alternative	Washington ground squirrels	Partially Complete	Found within the survey area; 785-foot buffer of colony does not overlap project features	Morrow
Approved Route access road changes in Morrow County	Washington ground squirrels	Partially Complete	No Washington ground squirrels found; full results not yet available.	Morrow

Section	Туре	Status	Results	County
Little Juniper Canyon Alternative	Threatened and endangered (T&E) plant species	Complete	No T&E plant species found	Morrow
Durbin Quarry (ODOT) Alternative	T&E plant species	Partially Complete (90%)	Snake River goldenweed population observed by IPC in 2022 overlaps the pulling and tensioning area.	Baker
True Blue Gulch Alternative	T&E plant species	Incomplete	No T&E plant species found; full results not yet available	Baker
Approved Route access road changes in Baker County	T&E plant species	Incomplete	No T&E plant species found; full results not yet available	Baker
Approved Route access road changes in Malheur County	T&E plant species	Incomplete	No T&E plant species found; full results not yet available	Malheur
Approved Route access road changes in Morrow County	T&E plant species	Incomplete	No T&E plant species found; full results not yet available	Morrow
Approved Route access road changes in Umatilla County	T&E plant species	Incomplete	No T&E plant species found; full results not yet available	Umatilla
Approved Route access road changes in Union County	T&E plant species	Incomplete	No T&E plant species found; full results not yet available	Union

#### 7.1.6.3 Findings

One WAGS colony was found within the survey area associated with the Little Juniper Canyon Alternative in Morrow County. The colony is located more than 785 feet outside of the proposed site boundary (no Category 1 habitat within the site boundary).

One populations of Snake River goldenweed was found within the site boundary associated with the Durbin Quarry Alternative. This population is located within and expands beyond a planned pulling and tensioning area.

#### 7.1.6.4 Conclusion

As previously stated in the Fish and Wildlife Habitat section above, ground-disturbing activities will be avoided in WAGS Category 1 habitat (within 785 feet of the colony boundary) per condition CON-TE-01.

Per condition CON-TE-02, the population of Snake River goldenweed which overlaps the pulling and tension area associated with the Durbin Quarry Alternative will be avoided by micrositing (by a 33-foot buffer) the road corridor. If avoidance is not possible, temporary construction mats will be installed over soils where the threatened or endangered plant species have been

observed and where construction vehicles will be operated. The same approach will be followed if threatened or endangered plant are identified during ongoing surveys prior to construction.

All previously imposed Council conditions for threatened and endangered species apply to RFA 1. There will be no changes to the conditions, and the proposed changes to the Project do not affect the Certificate Holder's ability to comply with any of the other previously imposed Site Certificate conditions for threatened and endangered species. Therefore, for the reasons discussed above and subject to the Site Certificate conditions, the Proposed Site Boundary Additions will comply with the Council's Threatened and Endangered Species Standard.

#### 7.1.7 Scenic Resources – OAR 345-022-0080

The Council previously concluded that the Project complies with the Scenic Resources Standard. OAR 345-022-0080 requires the Council to determine that the design, construction, and operation of the proposed Project will not have a "significant adverse impact" to any significant or important scenic resources and values in the analysis area. The previous scenic resource analysis for the ASC (Exhibit R) found 47 applicable federal and local land use management plans or development codes within the 10-mile analysis area of the Project. Based on the Certificate Holder's review of applicable land use plans, 23 of the 47 plans or codes have been updated or replaced by a new plan since the ASC (Baker County 2016, Benton County 2022, City of Hermiston 2014, City of Baker 2020, City of Island City 2022, City of Ione 2009, City of Irrigon 2014, 2017, City of La Grande 2013, City of Pendleton 2022, City of Stanfield 2017, City of Umatilla 2013, City of Vale 2014, CTUIR 2018, Morrow County 2017, 2019, ODFW 2017, 2018, 2022, OPRD 2019, Umatilla County 2022, Union County 2021, Washington County 2020). The updates did not identify additional scenic resources or include provisions that will warrant changes to the previous analyses of scenic resources. See Attachment 7-5, Table 1 for a description of the plans and codes and any updates. See Figure 7-9 for the locations of the identified scenic resources.

Additionally, the proximity of a majority of the previously identified scenic resources to the RFA 1 analysis area either remained the same as previously described in the ASC or increased, thus the impacts will be less than or equal to what was previously approved (Attachment 7-5, Table 2). For the one scenic resource that decreased in proximity to the Project (SR B5), the distances changed by approximately 0.1 mile, thus impacts were found to be similar to what was previously approved for these areas (Attachment 7-5, Table 2).

The Certificate Holder completed a comparative zone of visual influence (ZVI) analysis, presenting any change in visibility of the approved transmission line route compared to the proposed changes. For the vast majority of the proposed changes, there will be no change to the visibility of the transmission line. There are small, scattered amounts of decreased visibility and even smaller, scattered amounts of increased visibility. The impacts associated with these changes in visibility were found to be similar to what was previously approved for these areas (Attachment 7-5, Table 2).

Continued implementation of the following Site Certificate conditions will ensure that impacts to scenic resources will be minimized: GEN-PA-02 (avoidance of Ladd Marsh Wildlife Area if Morgan Lake alternative route is chosen), GEN-SR-01 (use of dull-galvanized steel), GEN-SR-02 (Union County visual impact reduction), GEN-SR-03 (National Historic Oregon Trail Interpretive Center visual impact reduction), and GEN-SR-04 (Birch Creek Area of Critical Environmental Concern [ACEC]).

Therefore, the Proposed Site Boundary Additions do not alter the basis for the Council's prior findings that the Project complies with the Scenic Resources Standard.

#### 7.1.8 Historical, Cultural and Archaeological Resources – OAR 345-022-0090

The Council previously concluded that the Project complies with the Historical, Cultural and Archaeological Resources Standard. OAR 345-022-0090 requires the Council to determine that the design, construction, and operation of the proposed Project will not have a significant adverse impact on historic, cultural, or archaeological resources that have been listed on, or will likely be listed on the National Register of Historic Places (NRHP); for a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in ORS 358.905(1)(c); and for a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).

The previous historic, cultural, and archaeological resource analysis for the ASC (Exhibit S) is summarized in the Proposed Order, particularly in Tables HCA-2, -3, -4, -6, and -7. These tables identify 29 avoided/not impacted segments/resources associated with the Oregon Trail, 10 potentially indirectly impacted segments/resources associated with the Oregon Trail, three (3) indirectly impacted Historic Properties of Religious and Cultural Significance to Indian Tribes, 104 potentially impacted resources, and 23 inventoried resources subject to the standards in OAR 345-022-0090.

#### 7.1.8.1 Background Review

IPC has completed record searches to identify previously recorded archaeological and historic sites within the site boundary of all proposed changes and that might be encountered during the course of the Project surveys. Research was conducted at the Oregon State Historic Preservation Office (SHPO), Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Tribal Historic Preservation Office, U.S. Department of Agriculture, Forest Service (USFS), and BLM offices to identify previous cultural resource surveys and previously recorded cultural resources within the Analysis Area. Oregon SHPO databases consulted include Oregon Archaeological Records Remote Access and Oregon Historic Sites Database. Data were collected for both archaeological and historic sites and included site location, age, type, ownership, NRHP status, and a brief description of site attributes. Additional sources of information included the Oregon Historic Trails website (<a href="http://www.oregonhistorictrailsfund.org">http://www.oregonhistorictrailsfund.org</a>), USGS Mineral Resource Data System, General Land Office plats, early USGS and state maps, other historic maps and aerial photographs, ethnographic literature, and historical contexts.

#### 7.1.8.2 Surveys

Cultural resource field surveys were performed consistent with applicable survey protocol plans and situated within the site boundary of all proposed changes. These include a cultural resources pedestrian survey of the direct analysis area and surveys in support of the Visual Assessment of Historic Properties within the Visual Assessment analysis area. These preconstruction surveys are ongoing and have identified resources subject to the Standards in OAR-345-022-0090 and they are listed in Table 7.1-16. Reports on these identified resources are forthcoming.

The Certificate Holder also completed a comparative ZVI analysis, presenting any change in visibility of the approved transmission line route compared to the proposed re-route within the Visual Assessment Analysis Area. For the vast majority of the re-route, there will be no change to the visibility of the transmission line. There are small, scattered amounts of decreased visibility and even smaller, scattered amounts of increased visibility. The impacts associated with these changes in visibility were found to be similar to what was previously approved for resources located in these areas. Outside of site boundary, no additional resources were identified for field analysis within the Visual Assessment analysis area.

**Table 7.1-16. Potentially Impacted Resources** 

Resource		Generalized Resource	NRHP		Project	Land	Applicable EFSC	Impact	Management
Number	County	Description/ Resource Type	Recommendation	Project Route	Component	Ownership	Standard	Avoided?	Comments
Oregon National Historic Trail Route	Umatilla, Union, Baker	Historic Trail	Eligible	Approved Route Access Road Changes	New Road, Primitive	PV	a) Potential Historic Property;	No – No significant physical and visual/auditory impact. No intact NHT segments at road change locations	If avoidance not possible, testing/segment eligibility evaluation/ consultation needed.
Sand Hollow Battleground	Morrow/ Umatilla	HPRCSIT	Eligible	Approved Route Access Road Changes	New Road, Bladed, Primitive	BLM, DOD, PV	a) Potential Historic Property	No – potential significant physical and visual/auditory impacts	If avoidance not possible, testing (metal detecting)/ continued consultation needed.
Sisupa	Morrow	HPRCSIT	Eligible	Approved Route Access Road Changes	New Road, Bladed, Primitive	DOD, PV	a) Potential Historic Property	No – potential significant physical and visual/auditory impacts	If avoidance not possible, continued consultation needed.
4B2H-EK-07	Baker	Historic: Water Conveyance (Smith Ditch)	Unevaluated	Approved Route Access Road Changes	Existing Road, Substantial Modification, 21- 70% Improvements	PV	a) Potential Historic Property;	No – Physical and visual/auditory impacts not significant.	Use of existing canal access road will not physically alter ditch. No further management.
7B2H-DM-ISO-22	Baker	Precontact: Isolated Find - Debitage	Unevaluated	Durbin Quarry (ODOT) Alternative	Route Centerline, New Road, Bladed	BLM	a) Potential Historic Property;	Yes	Flag/Avoid
7B2H-BB-ISO-04	Baker	Precontact: Isolated Find - Debitage	Unevaluated	Durbin Quarry (ODOT) Alternative	Route Centerline, New Road, Bladed	PV	a) Potential Historic     Property; b) Archaeological     site on private lands	Yes	Flag/Avoid
35BA01570/ 4B2H-EK-27	Baker	Historic Road	Not Eligible	Durbin Quarry (ODOT) Alternative	New Road, Bladed	BLM, PV	b) Archaeological site on private land.	No	No further management
35BA01571/ 4B2H-EK-28	Baker	Historic Water Conveyance	Not Eligible	Durbin Quarry (ODOT) Alternative	New Road, Bladed	BLM, PV	a) Potential Historic     Property; b) Archaeological     site on private lands	Yes	No further management
35BA01564/ 4B2H-EK-30	Baker	Historic Water Conveyance	Not Eligible	Durbin Quarry (ODOT) Alternative	New Road, Bladed	BLM	None - Archaeological site not eligible for NRHP. Federal land.	Yes	No further management

Resource Number	County	Generalized Resource Description/ Resource Type	NRHP Recommendation	Project Route	Project Component	Land Ownership	Applicable EFSC Standard	Impact Avoided?	Management Comments
8B2H-DM-23	Baker	Multi-component: Precontact: Lithic/Tool Scatter; Historic mine	Unevaluated	True Blue Gulch Alternative	Existing Road, Substantial Modification 71- 100% improvements, New Road, Bladed	BLM	a) Potential Historic Property	No – Potential significant physical impact for new road. No significant physical impact for existing road with mitigation.	If avoidance not possible, testing/ eligibility evaluation needed for new road. Gravel will be placed over existing road through site to protect resource from physical impacts of existing road use.
8B2H-DM-24	Baker	Precontact: Lithic/Tool Scatter	Unevaluated	True Blue Gulch Alternative	Existing Road, Substantial Modification 71- 100% improvements	PV	a) Potential Historic Property; b) Archaeological site on private lands	No – physical impact not significant with mitigation.	If avoidance not possible, gravel will be placed over existing road through site to protect resource from physical impacts of existing road use.
8B2H-DM-25	Baker	Precontact: Lithic/Tool Scatter	Unevaluated	True Blue Gulch Alternative	Existing Road, Substantial Modification 71- 100% improvements	PV	a) Potential Historic Property; b) Archaeological site on private lands	No – physical impact not significant with mitigation.	If avoidance not possible, gravel will be placed over existing road through site to protect resource from physical impacts of existing road use.
8B2H-DM-26	Baker	Precontact: Lithic scatter	Unevaluated	True Blue Gulch Alternative	Existing Road, Substantial Modification 71- 100% improvements	PV	a) Potential Historic Property; b) Archaeological site on private lands	No – physical impact not significant with mitigation.	If avoidance not possible, gravel will be placed over existing road through site to protect resource from physical impacts of existing road use.
8B2H-DM-27	Baker	Precontact: Lithic/Tool Scatter	Unevaluated	True Blue Gulch Alternative	Existing Road, Substantial Modification 71- 100% improvements	PV	a) Potential Historic Property; b) Archaeological site on private lands	No – physical impact not significant with mitigation.	If avoidance not possible, gravel will be placed over existing road through site to protect resource from physical impacts of existing road use.

Resource		Generalized Resource	NRHP		Project	Land	Applicable EFSC	Impact	Management
Number	County	Description/ Resource Type	Recommendation	Project Route	Component	Ownership	Standard	Avoided?	Comments
8B2H-DM-20	Baker	Precontact: Lithic/Tool Scatter	Unevaluated	True Blue Gulch	Existing Road, Substantial Modification, 71- 100% Improvements	PV	a) Potential Historic Property; b) Archaeological site on private lands	No – physical impact not significant with mitigation.	If avoidance not possible, gravel will be placed over existing road through site to protect resource from physical impacts of existing road use.
35BA1585 (6B2H-SA-14)	Baker	Precontact: Lithic Scatter	Unevaluated	Approved Route Access Road Changes	Existing Road, Substantial Modification, 21- 70% Improvements	PV	a) Potential Historic Property; b) Archaeological site on private lands	No – physical impact not significant with mitigation.	If avoidance not possible, gravel will be placed over existing road through site to protect resource from physical impacts of existing road use.
4B2H-EK-17	Baker	Historic Water Conveyance	Unevaluated	Approved Route Access Road Changes	Existing Road, No Improvements Permitted	PV	a) Potential Historic Property; b) Archaeological site on private lands	Yes	No features of site in existing road. No improvements of existing road permitted within 30 meters of site.
NRCS2011- T11S-R42E- S23/01	Baker	Precontact: Isolated Find: Debitage	Unevaluated	Approved Route Access Road Changes	New Road, Bladed	PV	a)Potential Historic Property; b) Archaeological site on private lands	No – potential physical impact	Flag/Avoid. Boundary Probe.
02S3600E07002	Union	Historic	Not Eligible	Approved Route Access Road Changes	Existing Road, Substantial Modification, 71- 100% Improvements	USFS, State of Oregon	None - Archaeological site not eligible for NRHP. Federal land.	No – physical impact not significant.	No further management
8B2H-AB-01.2	Malheur	Historic: South Canal Segment	Unevaluated (No status listed)	Approved Route Access Road Changes	Existing Road, Substantial Modification, 21- 70% Improvements	PV	a) Potential Historic Property	Yes	No further management
8B2H-JS-05	Malheur	Historic: Canal	Unevaluated (No Status listed)	Approved Route Access Road Changes	Existing Road, Substantial Modification, 21- 70% Improvements	PV	a) Potential Historic Property	Yes	No further management
8B2H-DM-51	Malheur	Multicomponent: Lithic Scatter and Refuse Scatter	Unevaluated	Approved Route Access Road Changes	New Road, Bladed	BLM, PV	a) Potential Historic Property; b) Archaeological site on private lands	No – potential physical impact	If avoidance not possible, testing/ eligibility evaluation needed.

Resource Number	County	Generalized Resource Description/ Resource Type	NRHP Recommendation	Project Route	Project Component	Land Ownership	Applicable EFSC Standard	Impact Avoided?	Management Comments
8B2H-ND-04	Malheur	Precontact: Lithic Scatter	Unevaluated	Approved Route Access Road Changes	New Road, Bladed	BLM	a) Potential Historic Property	No – potential physical impact	If avoidance not possible, testing/ eligibility evaluation needed.
35ML1674 (B2H- SA-33)	Malheur	Historic: Water Conveyance (Vines Ditch)	Eligible	Approved Route Access Road Changes	Existing Road, Substantial Modification, 71- 100% Improvements	BLM, PV	a) Potential Historic Property; b) Archaeological site on private lands	No – physical impact not significant with mitigation. Visual/ auditory impacts not significant	If avoidance not possible, gravel will be placed over existing road through site to protect resource from physical impacts of existing road use.
35ML1675 (B2H- SA-32)	Malheur	Historic: Railroad	Eligible	Approved Route Access Road Changes	Existing Road, Substantial Modification, 21- 70% Improvements	PV	a) Potential Historic Property; b) Archaeological site on private lands	No – physical impact not significant with mitigation. Visual/ auditory impacts not significant	If avoidance not possible, gravel will be placed over existing road through site to protect resource from physical impacts of existing road use.
35ML1678 (B2H- BS-77)	Malheur	Precontact: Lithic/Tool Scatter	Eligible	Approved Route Access Road Changes	New Road, Bladed	BLM	a) Potential Historic Property	No – potential physical impact	If avoidance not possible, testing/eligibility evaluation needed.
35ML2203 (B2H- SA-39 )	Malheur	Historic: Water Conveyance	Eligible	Approved Route Access Road Changes	Existing Road, No Improvements Permitted	PV	a) Potential Historic Property; b) Archaeological site on private lands	Yes	No improvements of existing road permitted within 30 meters of site.
4B2H-EK-47	Malheur	Historic: Water Conveyance (Vale Oregon Main Canal Segment)	Unevaluated	Approved Route Access Road Changes	New Road, Primitive	PV	a) Potential Historic Property	Yes	No further management.

BLM = Bureau of Land Management; EFSC = Energy Facility Siting Council; HPMP = Historic Properties Management Plan; HPRCSIT = Historic Property of Religious and Cultural Significance to Indian Tribes; NRHP = National Register of Historic Places; ODOT = Oregon Department of Transportation; PV = Private

#### 7.1.8.3 Findings

For those resources subject to the Council's standards, the Historic Properties Management Plan (HPMP) will include the final impact analysis and mitigation proposals for Historic, Cultural, and Archaeological Resources based upon the field surveys and in coordination with the lead federal agencies. The impact analysis and mitigation obligations will be rectified based on the boundary probing, testing, evaluation, and final NRHP eligibility determinations for the sites listed in Table 7.1-16 and will be made by the lead federal agencies in consultation with the Oregon SHPO and consistent with the Programmatic Agreement (PA), for Section 106 compliance. The preconstruction surveys will be included in reports submitted to the Oregon SHPO and EFSC and the NRHP eligibility, effects to resources, and mitigation will be resolved prior to construction consistent with the Site Certificate Conditions.

#### 7.1.8.4 Conclusion

Continued implementation of the following Site Certificate Conditions will ensure that impacts to historic, cultural, and archaeological resources will be minimized: GEN-HC-01 (avoid direct impacts to Oregon Trail/National Historic Trail resources), GEN-HC-02 (prepare HPMP prior to construction (by phase or segment), and CON-HC-01 (completion of a final Cultural Resources Report within three years of construction completion).

The proposed amendment makes no changes that will alter the basis for the Council's earlier findings, or its conclusion that the Project will not likely result in an adverse impact to any historical, cultural and archaeological resources in the Analysis Area, and therefore the Proposed Site Boundary Additions meet the requirement of the Historical, Cultural and Archaeological Resources Standard.

#### 7.1.9 Recreation - OAR 345-022-0100

The Council previously concluded that the Project complies with the Recreation Standard.<sup>31</sup> The updated Recreation Standard requires the Council to find that the design, construction, and operation of a facility, taking into account mitigation, will not likely result in significant, adverse impacts to important recreational opportunities, as defined by OAR 345-022-0100. Therefore, the Council's Recreation Standard applies to only those recreation areas that the Council deems important. Per Exhibit T of the ASC, there were 26 defined recreations areas within the previously defined 2-mile analysis area, 21 of which were determined to be important recreation areas. Based on the Certificate Holder's review of recreation areas, there is one new recreation area, the Glass Hill Preserve/State Natural Heritage Area, located within 2-miles of the proposed site boundary changes (analysis area) that was not previously addressed (see Figure 7-11, and Attachment 7-6, Tables 1 and 2), and in turn it is determined to be an important recreation area. Additionally, 10 previously identified recreation areas (Powder River [Scenic] and ACEC, Umatilla National Wildlife Refuge, Oregon Trail ACEC National Historic Oregon Trail Interpretive Center Parcel, Columbia Basin - Coyote Springs Wildlife Area, Ladd March Wildlife Area/State Natural Heritage Area, Blue Mountain Crossing Day-Use/Sno-Park, Spring Creek Campground, Virtue Flat Special Recreation Management Area, Blue Mountain Century Scenic Bikeway, and Grand Tour Scenic Bikeway) are not within the RFA 1 analysis area. A total of 17 defined recreation areas and 14 important recreation areas occur within the RFA 1 analysis area. Note that this analysis does not address the previously approved portions of the site boundary and solely addresses the proposed site boundary changes in RFA 1.

<sup>&</sup>lt;sup>31</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 568 (September 2022)

The significance of impacts on important recreation areas from direct or indirect loss of recreational opportunity, traffic, noise, visual viewshed alteration, and other impacts are disclosed in Exhibit T and the changes proposed by RFA 1 will not contribute any additional significant impacts to those already considered<sup>32</sup> (see Figure 7-11 and Attachment 7-6, Tables 1 and 2 for a full description). No loss of opportunity is anticipated for the newly identified recreation area, the Glass Hill Preserve/State Natural Heritage Area, due to the probability of no public access<sup>33</sup>, otherwise, less than significant, temporary intermittent access delays during construction, and no long-term loss of opportunity: Any traffic impacts from construction experienced at the Glass Hill Preserve/State Natural Heritage Area, will be short term or negligible due to probable lack of public access, and operational impacts will remain negligible due to infrequent maintenance and inspections required at the Project; construction noise impacts will be temporary in duration and episodic, and minimal due to the location of where the recreation site is crossed or negligible due to probable lack of public access, and operational noise impacts will be intermittent (due to infrequent maintenance and inspections) or otherwise indistinguishable from existing background noise; and visual impacts will be range from medium intensity (i.e., structures will introduce moderate visual contrast and appear co-dominant with the landscape and existing infrastructure), to less than significant due to the probable lack of public access, views of the Project being from mostly neutral or elevated vantage points, the localization of impacts, and no management for scenic quality (see Figure 7-12 and Attachment 7-6, Tables 1 and 2).

Additionally, the proximity of a majority of the previously identified recreation areas to the RFA 1 analysis area either remained the same as previously described in the ASC or increased, thus the impacts will be less than or equal to what was previously approved (Attachment 7-6, Table 1). For the two recreation areas that decreased in proximity to the Project, the Farewell Bend State Recreation Area and the Lindsay Prairie Preserve/State Natural Heritage Area, the distances decreased by 0.2 and 0.3 miles, respectively; thus, impacts were found to be similar to what was previously approved for these areas. The Farewell Bend State Recreation Area is closest in proximity to road design changes proposed by RFA 1 as opposed to the proposed three route realignments. Alternatively, the Lindsay Prairie Preserve/State Natural Heritage Area is closest in proximity to one of the proposed three route realignments proposed by RFA 1. specifically the Little Juniper Canyon Alternative. It is determined that even with the proposed changes, the loss of opportunity, traffic impacts, noise impacts, and visual impacts will remain comparable to what was previously approved.<sup>34</sup> See Attachment 7-6, Tables 1 and 2 for a full assessment of impacts at each recreation area. Continued implementation of the following Site Certificate Conditions will ensure that impacts to recreation areas will be minimized: GEN-RC-01 (Morgan Lake Park visual impact reduction), GEN-SR-03 (National Historic Oregon Trail Interpretive Center visual impact reduction), GEN-SR-04 (Birch Creek Area of Critical Environmental Concern visual impact reduction), GEN-HC-02 (implementation of Historic Properties Management Plan), PRE-PS-02 (traffic management and control measure implementation), and GEN-PS-01 (controlled helicopter use within two-miles of protected or recreation areas).

The changes proposed in RFA 1 do not alter the basis for the Council's earlier findings, or its conclusion that the Project will not likely result in a significant adverse impact to any Recreation

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<sup>&</sup>lt;sup>32</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 546-568 (September 2022)

<sup>&</sup>lt;sup>33</sup> Information on access obtained through a personal communication between Kristen Gulick, Tetra Tech, and Lindsey Wise, Oregon State University, Institute for Natural Resources, July 13, 2022.

<sup>&</sup>lt;sup>34</sup> Boardman to Hemingway Transmission Line Application for Site Certificate - Final Order, p. 546-568 (September 2022).

Areas in the analysis area. Therefore, the Proposed Site Boundary Additions meet the requirement of the Recreation Areas Standard.

#### 7.1.10 Wildfire Prevention and Risk Mitigation – OAR 345-022-0115

OAR 345-022-115 Wildfire Prevention and Risk Mitigation

- (1) To issue a site certificate, the Council must find that:
- (a) The applicant has adequately characterized wildfire risk within the analysis area using current data from reputable sources, by identifying:
- (A) Baseline wildfire risk, based on factors that are expected to remain fixed for multiple years, including but not limited to topography, vegetation, existing infrastructure, and climate;
- (B) Seasonal wildfire risk, based on factors that are expected to remain fixed for multiple months but may be dynamic throughout the year, including but not limited to, cumulative precipitation and fuel moisture content;
- (C) Areas subject to a heightened risk of wildfire, based on the information provided under paragraphs (A) and (B) of this subsection;
- (D) High-fire consequence areas, including but not limited to areas containing residences, critical infrastructure, recreation opportunities, timber and agricultural resources, and firesensitive wildlife habitat; and
- (E) All data sources and methods used to model and identify risks and areas under paragraphs (A) through (D) of this subsection.
- (b) That the proposed facility will be designed, constructed, and operated in compliance with a Wildfire Mitigation Plan approved by the Council. The Wildfire Mitigation Plan must, at a minimum:
- (A) Identify areas within the site boundary that are subject to a heightened risk of wildfire, using current data from reputable sources, and discuss data and methods used in the analysis:
- (B) Describe the procedures, standards, and time frames that the applicant will use to inspect facility components and manage vegetation in the areas identified under subsection (a) of this section:
- (C) Identify preventative actions and programs that the applicant will carry out to minimize the risk of facility components causing wildfire, including procedures that will be used to adjust operations during periods of heightened wildfire risk;
- (D) Identify procedures to minimize risks to public health and safety, the health and safety of responders, and damages to resources protected by Council standards in the event that a wildfire occurs at the facility site, regardless of ignition source; and
- (E) Describe methods the applicant will use to ensure that updates of the plan incorporate best practices and emerging technologies to minimize and mitigate wildfire risk.
- (2) The Council may issue a site certificate without making the findings under section (1) if it finds that the facility is subject to a Wildfire Protection Plan that has been approved in compliance with OAR chapter 860, division 300.

(3) This Standard does not apply to the review of any Application for Site Certificate or Request for Amendment that was determined to be complete under OAR 345-015-0190 or 345-027-0363 on or before the effective date of this rule.

IPC has prepared a Wildfire Mitigation Plan (Attachment 7-7) that has been filed with the Public Utility Commission of Oregon in compliance with OAR chapter 860, division 300. This plan would apply to the entire Project, including the proposed changes in RFA 1. Therefore, the Council may conclude that the Proposed Site Boundary Additions comply with OAR 345-022-0115(2) as they are subject to a wildfire protection plan approved by the Public Utility Commission.

#### 7.2 Other Standards and Laws

#### 7.2.1 Noise Control Regulations – OAR 340-035-0035

The Project Order requires an analysis of the Project's compliance with the Oregon Noise Regulations at OAR 340-035-0035.35

#### 7.2.1.1 Methods

OAR 345-021-0010(1)(x)(B): An analysis of the proposed facility's compliance with the applicable noise regulations in OAR 340-035-0035, including a discussion and justification of the methods and assumptions used in the analysis.

To demonstrate compliance with the Oregon Department of Environmental Quality (ODEQ) Noise Rules, IPC conducted an acoustic analysis of the Proposed Site Boundary Additions using the same multistep process that was used in the ASC and approved by the Council in the Final Order.<sup>36</sup>

#### 7.2.1.2 Construction, Regular Maintenance, and Helicopter Noise

OAR 340-035-0035(5): Exemptions: Except as otherwise provided in subparagraph (1)(b)(B)(ii) of this rule, the rules in section (1) of this rule shall not apply to: . . . (q) Sounds that originate on construction sites. (h) Sounds created in construction or maintenance of capital equipment; . . . (h) Sounds created in . . . maintenance of capital equipment; . . . (i) Sounds generated by the operation of aircraft and subject to pre-emptive federal regulation. This exception does not apply to aircraft engine testing, activity conducted at the airport that is not directly related to flight operations, and any other activity not pre-emptively regulated by the federal government or controlled under OAR 340-035-0045; . . . .

The Council previously found that noise resulting from Project's construction activities, regular maintenance activities, and helicopter operations is exempt from the Oregon Noise Regulations at OAR 340-035-0035(1).37 Because the Proposed Site Boundary Changes will involve the same construction, maintenance, and helicopter activities previously evaluated, the Council may

<sup>&</sup>lt;sup>35</sup> Boardman to Hemingway Transmission Line Application for Site Certificate – Second Amended Project Order, p. 21 (July 2018); see also OAR 345-021-0010(1)(y)(B) (requiring the same).

<sup>&</sup>lt;sup>36</sup> Boardman to Hemingway Transmission Line Application for Site Certificate – Final Order at pp. 673-76. <sup>37</sup> Final Order at pp. 655-57. As described in the Final Order, the Department engaged its consultant, Golder Associates Inc. (Golder), to evaluate IPC's methodologies for conducting baseline surveys and identifying the frequency of foul weather. Golder found that IPC's methodologies were sound. See Final Order at p. 676.

rely on its previous findings that those activities are exempt from the relevant Oregon Noise Regulations.

#### 7.2.1.3 Corona Noise

#### **Maximum Allowable Noise Standard**

OAR 340-035-0035(1)(b)(B)(i): No person owning or controlling a new industrial or commercial noise source located on a previously unused industrial or commercial site shall cause or permit the operation of that noise source if the noise levels generated or indirectly caused by that noise source . . . exceed the levels specified in Table 8, as measured at an appropriate measurement point, as specified in subsection (3)(b) of this rule, except as specified in subparagraph (1)(b)(B)(iii).

Under the maximum allowable noise standard, a new industrial or commercial noise source to be located on a previously unused site may not exceed the noise levels specified in Table 8 of the noise rules. The maximum allowable L<sub>50</sub> sound level standard relevant to the Project is 50 A-weighted decibels (dBA). The Council previously found that IPC sufficiently demonstrated that the maximum sound level resulting from corona noise in a "worse-case scenario" (that is, during foul weather) will be no greater than 46 dBA, and accordingly, the Council found that the Project would be in compliance with the maximum allowable sound level standard identified in OAR 340-035-0035(1)(b)(B)(i).<sup>38</sup> As shown in Table 7.2-1, the Proposed Site Boundary Additions will result in maximum sound levels no greater than 37 dBA, which is less than the 46 dBA previously considered by the Council. Thus, the Council may rely on its previous findings that the Project complies with maximum allowable noise standard in OAR 340-035-0035(1)(b)(B)(i) and Table 8.

#### **Ambient Antidegradation Standard**

OAR 340-035-0035(1)(b)(B)(i): No person owning or controlling a new industrial or commercial noise source located on a previously unused industrial or commercial site shall cause or permit the operation of that noise source if the noise levels generated or indirectly caused by that noise source increase the ambient statistical noise levels, L10 or L50, by more than 10 dBA in any one hour . . . as measured at an appropriate measurement point, as specified in subsection (3)(b) of this rule, except as specified in subparagraph (1)(b)(B)(iii).

The ambient antidegradation standard under OAR 340-035-0035(1)(b)(B)(i) allows a maximum increase in ambient statistical noise of 10 dBA, as measured at an "appropriate measurement point" from noise generated from a new industrial source. "Appropriate measurement point" is defined in -0035(3)(B) as a point on the noise sensitive property (also referred to as noise-sensitive receptor [NSR]) nearest to the noise source. The Council previously found that foul weather corona noise from the Project may exceed the ambient antidegradation standard during low wind, late night (midnight to 5 a.m.) conditions. However, the Council granted the Project an exception and a variance to compliance with the ambient antidegradation standard with respect to corona noise, and found that the Project otherwise complies with the Noise Control Regulations. However, the Council granted the Noise Control Regulations.

<sup>&</sup>lt;sup>38</sup> Final Order at p. 679.

<sup>&</sup>lt;sup>39</sup> Final Order at p. 679.

<sup>&</sup>lt;sup>40</sup> Final Order at p. 699.

#### Potential Exceedances of the Ambient Antidegradation Standard

For the proposed site boundary changes, IPC used the same methods that the Council previously reviewed and approved, comparing baseline ambient sound levels to the modeled predicted future sound levels at potentially affected NSRs. For the baseline ambient sound levels, IPC relied on the baseline monitoring positions and related sound data previously reviewed and approved by the Council. IPC identified the potentially affected NSRs using the same approach previously reviewed and approved by the Council—that is, IPC analyzed (a) all NSRs within 1/2 mile of the transmission line; and (b) NSRs out to one mile in areas where the late-night baseline sound level was unusually low (i.e., less than 26 dBA). IPC then compared the ambient baseline sound levels with the predicted future sound levels at the potentially affected NSRs.

IPC identified two potentially affected NSRs: one NSR near the Little Juniper Canyon Alternative, one NSR related to the True Blue Gulch Alternative, and no NSRs related to the Durbin Quarry Alternative. <sup>41</sup> The results of the analysis indicate that during typical fair weather conditions, the Proposed Site Boundary Additions will comply with the ambient antidegradation standard. However, a potential increase of more than 10 dBA above the L<sub>50</sub> baseline may occur at one of the NSRs during foul weather in low wind, late night conditions. Table 7.2-1 presents the foul weather analysis at the NSRs evaluated by IPC. Figures 7-13 and 7-14 show the orientation of the two NSRs in relation to the Proposed Site Boundary Additions.

Table 7.2-1. Summary of Acoustic Modeling Results for the Proposed Site Boundary Additions

NSR Number	Distance from NSR to Transmission Line (feet)	Nearest Milepost	Related Alternative	Associated Monitoring Point (MP)	Late Night Baseline Sound Pressure Level (dBA)	Predicted Future Sound Level (Foul Weather) (dBA)	Increase (dBA)
3	1,845	17.9	Little Juniper Canyon Alternative	MP05	27	35	+8
5010	2,698	174.2	True Blue Gulch Alternative	MP35	24	37	+13

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<sup>&</sup>lt;sup>41</sup> For the Little Juniper Canyon Alternative, IPC identified the potentially affected NSRs within 1/2 mile of the Proposed Site Boundary Additions. For the True Blue Gulch Alternative, IPC identified the potentially affected NSRs within one mile, rather than 1/2 mile, of the Proposed Site Boundary Additions, because the ambient late night baseline sound level associated with the relevant monitoring point was less than 26 dBA.

#### **Exception to Ambient Antidegradation Standard**

OAR 340-035-0035(6): Exceptions: Upon written request from the owner or controller of an industrial or commercial noise source, the Department may authorize exceptions to section (1) of this rule, pursuant to rule 340-035-0010, for: (a) Unusual and/or infrequent events; . . . .

A potential increase of more than 10 dBA above the ambient baseline sound levels may occur at one of the potentially affected NSRs during infrequent periods representative of foul weather conditions. The Council previously granted the Project an exception from compliance with the ambient antidegradation standard due to unusual or infrequent foul weather events, as authorized under OAR 345-035-0035(6)(a), subject to the Noise Control Conditions described in the Final Order.<sup>42</sup> Because the Project has already received an exception, IPC does not need to request a separate exception from the Council to address the exceedance related to the Proposed Site Boundary Additions.

In addition, or in the alternative, IPC notes that the same NSR exceedance identified here was previously considered by the Council as part of its decision to grant the Project an exception—NSR 5010 was one of the NSR exceedances presented in the ASC, 43 considered in the Final Order, 44 and contemplated in the Site Certificate Conditions. 45 Furthermore, the predicted noise impacts related to the Proposed Site Boundary Additions (+13 dBA) will be less than the predicted impact the Council approved in the Final Order (+17 dBA). 46 Indeed, IPC worked with the property owner of NSR 5010 to locate the Proposed Site Boundary Additions along the edge of their property, in part, to minimize the noise impacts; and the NSR property owner and IPC have mutually agreed that the Proposed Site Boundary Additions on their property are acceptable. Therefore, because the Council previously considered noise impacts to NSR 5010 as part of its decision to grant the Project an exception and the impacts under the Proposed Site Boundary Additions are less than those previously considered by the Council, the Council may rely on its previous findings and conclusions, which continue to support granting the Project an exception from compliance with the ambient antidegradation standard as it relates to NSR 5010 and the Proposed Site Boundary Additions.

#### Request for Variance to Ambient Antidegradation Standard

The Council previously granted the Project a variance from compliance with the ambient antidegradation standard under OAR 345-035-0100(1), finding strict compliance would be inappropriate due to conditions beyond IPC's control, special circumstances and physical conditions would render strict compliance unreasonable, and strict compliance would prohibit the Project from being built.<sup>47</sup> Because the Project has already received a variance, IPC does not need to request a separate variance from the Council to address the exceedance related to the Proposed Site Boundary Additions.

And similar to the discussion related to the exception, because the Council previously considered noise impacts to NSR 5010 as part of its decision to grant the Project a variance and the impacts under the Proposed Site Boundary Additions are less than those previously considered by the Council, the Council may rely on its previous findings and conclusions, which

<sup>&</sup>lt;sup>42</sup> See Final Order at p. 682.

<sup>&</sup>lt;sup>43</sup> ASC, Exhibit X, Table X-5, Figure X-8, and at pp. X-33 and X-52.

<sup>&</sup>lt;sup>44</sup> Final Order at Table NC-4 and at p. 692.

<sup>&</sup>lt;sup>45</sup> Final Order, Attachment 1, Site Certificate at 40 (Noise Control Condition 1).

<sup>&</sup>lt;sup>46</sup> See Final Order, Table NC-4.

<sup>&</sup>lt;sup>47</sup> See Final Order at pp. 696-99.

continue to support granting the Project a variance from compliance with the ambient antidegradation standard as it relates to NSR 5010 and the Proposed Site Boundary Additions.

#### 7.2.1.4 Quiet Areas

OAR 340-035-0035(1)(c): Quiet Areas. No person owning or controlling an industrial or commercial noise source located either within the boundaries of a quiet area or outside its boundaries shall cause or permit the operation of that noise source if the statistical noise levels generated by that source exceed the levels specified in Table 9 as measured within the quiet area and not less than 400 feet (122 meters) from the noise source.

There are no ODEQ-designated "quiet areas" within the Proposed Site Boundary Additions or within the vicinity of the Project. Therefore, the Project will be in compliance with OAR 340-035-0035(c).

#### 7.2.1.5 Impulse Sound

OAR 340-035-0035(1)(d): Impulse Sound. Notwithstanding the noise rules in Tables 7 through 9, no person owning or controlling an industrial or commercial noise source shall cause or permit the operation of that noise source if an impulsive sound is emitted in air by that source which exceeds the sound pressure levels specified below, as measured at an appropriate measurement point, as specified in subsection (3)(b) of this rule: (A) Blasting. 98 dBC, slow response, between the hours of 7 a.m. and 10 p.m. and 93 dBC, slow response, between the hours of 10 p.m. and 7 a.m. (B) All Other Impulse Sounds. 100 dB, peak response, between the hours of 7 a.m. and 10 p.m. and 80 dB, peak response, between the hours of 10 p.m. and 7 a.m.

OAR 340-035-0035(1)(d) applies to blasting and other impulse sounds resulting from the "operation" of noise sources. Here, while the Project may include certain blasting or other impulse sounds, those sounds will occur during construction and not operation of the Project. Accordingly, the Project will be in compliance with OAR 340-035-0035(1)(d).

#### 7.2.1.6 Measures to Reduce Noise Levels or Noise Impacts, or to Address Complaints

OAR 345-021-0010(1)(x)(C): Any measures the applicant proposes to reduce noise levels or noise impacts or to address public complaints about noise from the facility.

IPC is not proposing any changes to the Noise Control conditions set forth in the Final Order, which would apply to the Proposed Site Boundary Additions.<sup>48</sup>

#### 7.2.1.7 Monitoring

OAR 345-021-0010(1)(x)(D): Any measures the applicant proposes to monitor noise generated by operation of the facility.

IPC is not proposing any changes to the Noise Control conditions set forth in the Final Order, which would apply to the Proposed Site Boundary Additions.<sup>49</sup>

<sup>&</sup>lt;sup>48</sup> See Final Order, Attachment 1, Site Certificate at 40-44 (Noise Control Conditions 1 and 2).

<sup>&</sup>lt;sup>49</sup> See Final Order, Attachment 1, Site Certificate at 40-44 (Noise Control Conditions 1 and 2).

# 7.2.1.8 List of Noise Sensitive Properties

OAR 345-021-0010(1)(x)(E): A list of the names and addresses of all owners of noise sensitive property, as defined in OAR 340-035-0015, within one mile of the proposed site boundary.

Per the Second Amended Project Order, the list of NSR owners must include all owners of NSRs within one-half mile, and not one mile, of the Site Boundary.<sup>50</sup> Refer to Exhibit F, Attachment F-1, for a list of the names and addresses of all owners of NSRs within one-half mile from the Proposed Site Boundary Additions.

#### 7.2.2 Removal-Fill Law

The Oregon Removal-Fill Law (ORS 196.795 through ORS 196.990) and Oregon Department of State Lands regulations (OAR 141-085-0500 through OAR 141-085-0785) require a removal-fill permit if 50 cubic yards or more of material is removed, filled, or altered within many "waters of the state." For activities in ESH streams, State Scenic Waterways and compensatory mitigation sites, a permit is required for any amount of removal or fill.

As detailed in Exhibit J of the ASC, a removal-fill permit is required for the Project. The information provided in Section 5.3 of this RFA 1 will be incorporated into an updated wetland delineation report for the proposed changes per condition PRE-RF-01. An updated removal-fill permit is required prior to construction and IPC will comply with procedures in all removal-fill conditions included in the permit per conditions GEN-RF-03 and GEN-RF-04.

IPC will incorporate the changes proposed in RFA 1 in a revised Joint Permit Application per condition PRE-RF-02 including a final Site Rehabilitation Plan (condition GEN-RF-01) and final Compensatory Wetland and Non-Wetland Mitigation Plan (Condition GEN-RF-02).

Therefore, the Proposed Site Boundary Additions do not significantly alter the prior analysis and the Proposed Site Boundary Additions will comply with the Oregon Removal-Fill Law.

# 8.0 PROPERTY OWNERS OF RECORD - OAR 345-027-0360(1)(F)

OAR 345-027-0360(1)(f):A list of the names and mailing addresses of property owners, as described in this rule:

- (A) The list must include all owners of record, as shown on the most recent property tax assessment roll, of property located:
- (i) Within 100 feet of property which the subject of the request for amendment, where the subject property is wholly or in part within an urban growth boundary;
- (ii) Within 250 feet of property which is the subject of the request for amendment, where the subject property is outside an urban growth boundary and not within a farm or forest zone; or
- (iii) Within 500 feet of property which is the subject of the request for amendment, where the subject property is within a farm or forest zone; and
- (B) In addition to incorporating the list in the request for amendment, the applicant must submit the list to the Department in an electronic format acceptable to the Department.

<sup>&</sup>lt;sup>50</sup> See Second Amended Project Order, Section III(x); Final Order at 673.

A property owner list applicable to this RFA 1 is provided in Attachment 8-1 and the notification area is shown on Figure 8-1.

# 9.0 CONCLUSION

Based on the information provided in this submittal, IPC has demonstrated that the Proposed Site Boundary Additions will comply with the requirements of the Oregon Energy Facility Site Statutes, ORS 469.300 to 469.520, with all other Oregon statutes and administrative rules applicable to the amendment of the Site Certificate that are within the Council's jurisdiction, and that the existing Site Certificate conditions ensure that the Facility will continue to comply with the applicable laws, standards, and rules. For these reasons, IPC respectfully requests approval of RFA 1.

# 10.0 REFERENCES

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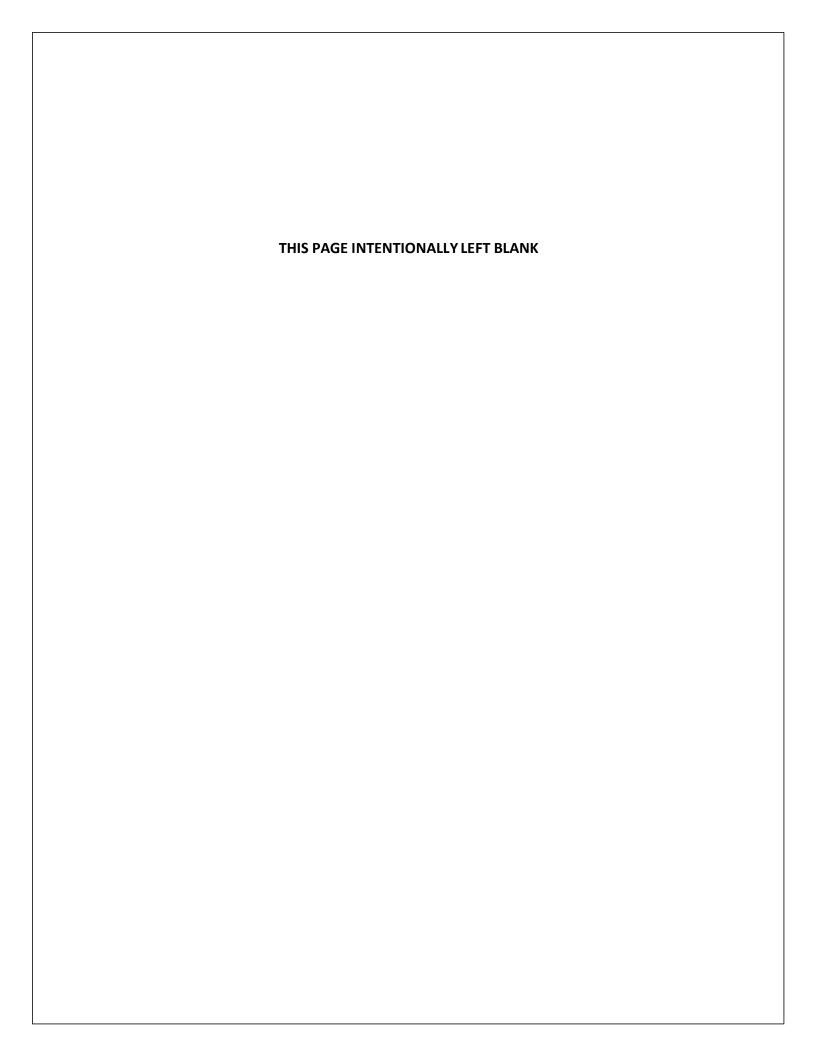
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# **FIGURES**

# Attachment 6-1. Red-lined Site Certificate





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# **Attachments**

Attachment A

Facility Location Mapsets (ASC Exhibit C)

# **Acronyms and Abbreviations**

ASC Application for Site Certificate

C-12 Heavy Industrial

Certificate Holder Idaho Power Company

Council Oregon Energy Facility Siting Council

CWNWMP Compensatory Wetland and Non-Wetland Mitigation Plan

Department Oregon Department of Energy

DOGAMI Oregon Department of Geology and Mineral Industries

DSL Oregon Department of State Lands

EFU Exclusive Farm Use email electronic submission ERU Exclusive Range Use

ESCP Erosion Sediment Control Plan
FAA Federal Aviation Administration

facility Boardman to Hemingway Transmission Line Project

Final Order on the ASC Final Order on the Application for Site Certificate for the Boardman

to Hemingway Transmission Line Project

FΡ

Ft feet

FW Fish and Wildlife Habitat

GEN general condition

HC Historic, Cultural, and Archeological Resources

HMP Habitat Mitigation Plan

HPMP Historic Properties Management Plan

HQT Habitat Quantification Tool
JPA Joint Permit Application

LU Land Use

MCZO Morrow County zoning ordinances

MG General Industrial MUAs Multi-use areas

NC Noise Control Regulations

NOV Notice of Violation

NPDES National Pollutant Discharge Elimination System

NSR Noise Sensitive Receptor

NWSTF Naval Weapons Systems Training Facility

O&M Operations and Maintenance
OAR Oregon Administrative Rule
ODA Oregon Department of Aviation

ODFW Oregon Department of Fish and Wildlife

OE Organizational Expertise
ORS Oregon Revised Statute

PA Protected Area parent company IDACORP, Inc. PS Public Services

RC Recreation

RF Removal Fill Law

RT Retirement and Financial Assurance SHPO State Historic Preservation Office

SP Soil Protection

SPCC Plan Spill Prevention Control and Countermeasures Plan

SR Scenic Resources
SS Structural Standard
State State of Oregon

TE Threatened and Endangered species
TL Siting Standards for Transmission Lines

TMIP Transmission Maintenance and Inspection Plan

WAGS Washington ground squirrel

WM Waste Minimization

#### 1.0 Introduction and Site Certification

This site certificate is a binding agreement between the State of Oregon (State), acting through the Energy Facility Siting Council (Council), and Idaho Power Company (certificate holder), which is a wholly owned subsidiary of IDACORP, Inc. (parent company). As authorized under Oregon Revised Statute (ORS) Chapter 469, the Council issues this site certificate authorizing the certificate holder to construct, operate and retire the Boardman to Hemingway Transmission Line Project (facility) within the below described approved corridor within Malheur, Baker, Union, Umatilla, and Morrow counties, subject to the conditions set forth herein.

Both the State and certificate holder must abide by local ordinances, state law and the rules of the Council in effect on the date this site certificate is executed. However, upon a clear showing of a significant threat to public health, safety, or the environment that requires application of later-adopted laws or rules, the Council may require compliance with such later-adopted laws or rules (ORS 469.401(2)).

The findings of fact, reasoning and conclusions of law underlying the terms and conditions of this site certificate are set forth in the following documents, incorporated herein by this reference: (a) the Final Order on the Application for Site Certificate for the Boardman to Hemingway Transmission Line Project issued on September 27, 2022 (hereafter, Final Order on the ASC). Any ambiguity will be clarified by reference to the following, in order of priority: (1) the Final Order on the ASC, and (2) the record of the proceedings that led to the Final Order on the ASC. This site certificate binds the State and all counties, cities and political subdivisions in Oregon as to the approval of the site and the construction, operation, and retirement of the facility as to matters that are addressed in and governed by this site certificate (ORS 469.401(3)). This site certificate does not address, and is not binding with respect to, matters that are not included in and governed by this site certificate, and such matters include, but are not limited to: employee health and safety; building code compliance; wage and hour or other labor regulations; local government fees and charges; other design or operational issues that do not relate to siting the facility (ORS 469.401(4)); and permits issued under statutes and rules for which the decision on compliance has been delegated by the federal government to a state agency other than the Council (ORS 469.503(3)).

Each affected state agency, county, city, and political subdivision in Oregon with authority to issue a permit, license, or other approval addressed in or governed by this site certificate, shall upon submission of the proper application and payment of the proper fees, but without hearings or other proceedings, issue such permit, license or other approval subject only to conditions set forth in this site certificate. In addition, each state agency or local government agency that issues a permit, license or other approval for this facility shall continue to exercise enforcement authority over such permit, license or other approval (ORS 469.401(3)). For those permits, licenses, or other approvals addressed in and

governed by this site certificate, the certificate holder shall comply with applicable state and federal laws adopted in the future to the extent that such compliance is required under the respective state agency statutes and rules (ORS 469.401(2)).

The certificate holder must construct, operate and retire the facility in accordance with all applicable rules as provided for in Oregon Administrative Rule (OAR) Chapter 345, Division 26. After issuance of this site certificate, the Council shall have continuing authority over the site and may inspect, or direct the Oregon Department of Energy (Department) to inspect, or request another state agency or local government to inspect, the site at any time in order to ensure that the facility is being operated consistently with the terms and conditions of this site certificate (ORS 469.430).

The obligation of the certificate holder to report information to the Department or the Council under the conditions listed in this site certificate is subject to the provisions of ORS 192.502 *et seq.* and ORS 469.560. To the extent permitted by law, the Department and the Council will not publicly disclose information that may be exempt from public disclosure if the certificate holder has clearly labeled such information and stated the basis for the exemption at the time of submitting the information to the Department or the Council. If the Council or the Department receives a request for the disclosure of the information, the Council or the Department, as appropriate, will make a reasonable attempt to notify the certificate holder and will refer the matter to the Attorney General for a determination of whether the exemption is applicable, pursuant to ORS 192.450.

The Council recognizes that many specific tasks related to the design, construction, operation and retirement of the facility will be undertaken by the certificate holder's agents or contractors. Nevertheless, the certificate holder is responsible for ensuring compliance with all provisions of the site certificate.

The duration of this site certificate shall be the life of the facility, subject to termination pursuant to OAR 345-027-0110 or the rules in effect on the date that termination is sought, or revocation under ORS 469.440 and OAR 345-029-0100 or the statutes and rules in effect on the date that revocation is ordered. The Council shall not change the conditions of this site certificate except as provided for in OAR Chapter 345, Division 27.

The definitions in ORS 469.300 and OAR 345-001-0010 apply to the terms used in this site certificate, except where otherwise stated, or where the context clearly indicates otherwise.

# 2.0 Facility Location, Site Boundary and Micrositing Transmission Line Corridors

The facility traverses five counties in Oregon including Morrow, Umatilla, Union, Baker and Malheur; and two cities including North Powder and Huntington, as presented in the mapsets included in Attachment A.

The approved site boundary contains approximately 23,041 24,000 acres. For the 500-kV transmission line, the site boundary is a 500-foot-wide area within which the transmission line, all transmission structures, and communication stations are approved to be located. The site boundary for the remaining facility features varies, based on the type of feature and use. The site boundary for the approved Longhorn Station is approximately 190 acres. The site boundary for access roads is either 100 or 200-feet in width, depending on the nature of the road.

The site boundary is equivalent to a micrositing transmission line corridor. A micrositing/transmission line corridor is a continuous area of land not to exceed 0.5-mile in width within which construction of facility components may occur, subject to site certificate conditions. The Council permits final siting flexibility within the approved micrositing transmission corridor because the certificate holder has demonstrated that requirements of all applicable standards have been satisfied by adequately evaluating the entire corridor and location of facility components anywhere within the corridor/site boundary.

# 3.0 Facility Description

The facility includes approximately 300 miles of electric transmission line, with approximately 272.8 miles located in Oregon and 23.8 miles in Idaho. The facility is approved to construct, operate and retire the following major components:

- Transmission Lines: The approved route consists of an approximately 270.8-mile-long single-circuit 500-kV electric transmission line, removal of 12 miles of existing 69-kV transmission line, rebuilding of 0.9 mile of a 230-kV transmission line, and rebuilding of 1.1 miles of an existing 138-kV transmission line into a new ROW. Seven Four approved alternative routes represent approximately 40.533.3 miles of transmission line.
- Longhorn Station: A 20-acre switching station, the Longhorn Station, is approved to be
  located near the Port of Morrow, Oregon. The switching station provides a combination
  of switching, protection, and control equipment arranged to provide circuit protection
  and system switching flexibility for the transfer of electric power; it does not
  incorporate step-down or step-up voltage equipment. The station connects the
  transmission line to other 500-kV transmission lines and the Pacific Northwest power
  market.

<sup>&</sup>lt;sup>1</sup> B2HAPPDoc3-3 ASC 02a\_Exhibit\_B\_Project Description\_ASC 2018-09-28. Section 3.2.2.3 and 3.5.2.

<sup>&</sup>lt;sup>2</sup> OAR 345-001-0010(7) and (32)

- Communication Stations: Ten communication station sites (and two alternative communication stations sites) each consisting of a communication shelter and related facilities. Each communication station site is less than 1/4-acre in size.
- Access Roads: The facility includes permanent access roads for the approved route, including 206.3 miles of new roads and 223.2 miles of existing roads requiring substantial modification. The approved alternative routes includes 30.2 miles of new roads and 22.7 miles of existing roads requiring substantial modification.
- Temporary Features used during Construction: The transmission line includes 30 temporary multi-use areas and 299 temporary pulling and tensioning sites, four of which have light-duty fly yards within the pulling and tensioning sites.

# 3.1 Facility Component Requirements

Transmission line structures for the approved route and approved alternatives routes shall be substantially similar to the structure type, number, height and disturbance areas presented in Tables 1 and 2 below. Transmission structure foundations shall be substantially similar to the depth and diameter presented in Table 3 below.

**Table 1: Approved Route Structure Characteristics** 

Structure Type	Number of Structures	Height (ft)	Distance Between Structures (ft)	Construction Disturbance Area per Structure (ft)	Operational Disturbance Area per Structure (ft)
500-kV Single-Circuit Lattice Steel Structure	1,076	109-200	1,200-1,800	250 x 250	50 x 50
500-kV Single-Circuit Tubular Steel Pole H- Frame Structure (NWSTF Boardman area)	70	65-105	350-950	90 x 250 on NWSTF and 150 x 250 off NWSTF	40 x 10
Rebuild Single-Circuit 138-kV Wood H-Frame Structure	9	51-61	500-750	250 x 150	16.5 x 5
500-kV Single-Circuit Tubular Steel Pole H- Frame	6	65-105	450-900	250 x 250	40 x 10
Rebuild Single Circuit 230-kV Steel H-Frame Structure	5	57-75	400-1,200	250 x 100	25 x 5
500-kV Single-Circuit H-Frame	5	85-145	950-1650	250 x 250	40 x 10
230-kV Single-Circuit Tubular Steel 3-Pole Dead-end	4	61-66	NA	250 x 150	130 x 4
500-kV Single-Circuit Tubular Steel 3-Pole Dead-end	4	115	NA	250 x 250	90 x 10
500-kV Single Circuit Tubular Steel 3-Pole Dead-end (NWSTF Boardman area)	3	115	NA	90 x 250	90 x 10
500-kV Single-Circuit Tubular Steel 3-Pole Dead-end	3	75-90	NA	250 x 250	90 x 10
138-kV Single-Circuit 3-Pole Dead-end	3	51.5	NA	250 x 150	130 x 30

**Table 2: Approved Alternative Route Structure Characteristics** 

Structure Type	Number of Structures	Height (ft)	Distance Between Structures (ft)	Construction Disturbance Area per Structure (ft)	Operational Disturbance Area per Structure (ft)
500-kV Single-Circuit Lattice Steel Structure	114	109-200	1,200-1,800	250 x 250	50 x 50
500-kV Single-Circuit Tubular Steel Pole H- Frame (NWSTF Boardman area)	33	90-100	550-1100	90 x 250 on NWSTF and 150 x 250 off NWSTF	40 x 10
500-kV Single-Circuit Tubular Steel Pole Y- Frame (NWSTF Boardman area)	8	85-95	575-980	Varies (0.4 acre)	8 x 8
500-kV Single-Circuit, H-Frame Dead-end (NWSTF Boardman area)	2	95-100	NA	90 x 250	50 x 10
500-kV Single-Circuit, 3-Pole Dead-end (NWSTF Boardman Area)	2	115	NA	90 x 250	90 x 10

**Table 3: Foundation Excavation Dimensions** 

Structure Type	Number of Holes per Structure	Depth (feet)	Diameter (feet)	Concrete (cubic yards)
500-kV Single-Circuit 3-Pole Deadend	3	30	9	212
500-kV Single-Circuit H-Frame	2	25	8	93
500-kV Single-Circuit Lattice, Heavy Dead-end	4	30	6	126
500-kV Single-Circuit Lattice, Heavy Tangent	4	16	4	30
500-kV Single-Circuit Lattice, Light Tangent	4	16	4	30
500-kV Single-Circuit Lattice, Medium Dead-end	4	22	6	93
500-kV Single-Circuit Lattice, Small Angle	4	16	6	68
500-kV Single Circuit Y-Frame, Tangent	1	43	8	80
500-kV Single-Circuit H-Frame, Tangent	2	25	8	93
230-kV Single-Circuit 3-Pole Deadend, Guyed	3	12	4	NA
230-kV Single-Circuit H-Frame, Tangent	2	12	4	NA
138-kV Single-Circuit 3-Pole Deadend	3	9	4	NA
138-kV Single-Circuit H-Frame, Tangent	2	9	4	NA

# **Longhorn Switching Station**

The Longhorn Switching Station is approved to include the following components:

- o 500-kV circuit breakers
- o high-voltage switches, bus supports
- o 125-135' transmission line termination structures
- o 500-kV series capacitor bank, and 500-kV shunt reactor
- o a control house for communications, control equipment, and a restroom facility
- o a new all-weather access road
- o fire protection systems with:
  - Automatic suppression systems such as fire sprinklers, foam, gaseous, explosion suppression, or other specialized extinguishing systems and appropriate alarms.
  - Adequate water supply, storage, and distribution systems for water-based extinguishing systems.

- Automatic fire detection, occupant warning, manual fire alarm, and fire alarm reporting systems combined with properly equipped and adequately trained fire departments.
- Fire barrier systems or combinations of physical separation and barriers for outdoor locations.

# Communication Systems and Stations

## **Optical Ground Wire**

Each 500-kV structure will have two lightning protection shield wires installed on the structure peaks.

#### Communication Station Sites

Each communication station site is approved to be 100' by 100' with a fenced area of 75' by 75'. Each communication station site is approved to include:

- a prefabricated concrete communications structure with dimensions of approximately
   11.5 feet by 32 feet by 12 feet tall on each site
- o a standby generator with a liquefied propane gas tank
- o Two separate conduit (underground) or aerial cable routes with two-inch-diameter polyvinyl chloride buried three feet below the surface
- smoke detectors

# **Communication Station Distribution Lines**

Distribution lines are approved to serve communication stations BA-02, and MA-01, MA-02, MA-03, as well as alternative a communication station in Malheur County.<sup>3</sup>

Related or Supporting Facilities (Permanent and Temporary)

#### Access Roads

Temporary, permanent and substantially modified access road classification and limits of disturbance are presented in the table below.

<sup>&</sup>lt;sup>3</sup> B2HAPPDoc3-3 ASC 02a\_Exhibit\_B\_Project Description\_ASC 2018-09-28, Section 3.3.4.

**Table 4: Summary of Access Road Classifications** 

Access Road	Classification	Site Boundary	Construction Disturbance	Operations Disturbance	Road Prism or Profile Changes	Extent of Work
	Primitive	200 feet	16 feet	10 feet	Yes	Clearing of vegetation or obstructions. Create roads by direct vehicle travel.
New Roads	Bladed	200 feet	16–35 feet	14 feet	Yes	Clearing of vegetation or obstructions. Create roads by cutting/filling existing terrain.
Existing Roads -	Substantial Modification, 21-70% Improved	100 feet	16 feet	14 feet	Yes	Reconstruct portions of existing road to improve road function. Possible road prism widening, profile adjustments, horizontal curve adjustments, or material placement.
Substantial Modification	Substantial Modification, 71-100% Improved	100 feet	16–30 feet	14 feet		Reconstruct portions of existing road to improve road function. Possible road prism widening, profile adjustments, horizontal curve adjustments, or material placement.
Existing Roads  - No Substantial Modification	No Substantial Modification, 0-20% Improved	NA <sup>1</sup>	NA <sup>1</sup>	NA <sup>1</sup>	No	Repair of existing road to maintain original road function. No betterment of existing road function or design.

<sup>&</sup>lt;sup>1</sup> Existing roads with no substantial modifications are not included in the Site Boundary and do not have an operation or construction disturbance width assigned to them.

Source: B2HAPPDoc3-3 ASC 02a\_Exhibit\_B\_Project Description\_ASC 2018-09-28, Table B-12.

Temporary Multi-Use Areas

The facility is approved to construct temporary multi-use areas approximately every 15 miles along the ROW. The multi-use areas (MUAs) are temporary construction areas to serve as field offices; reporting locations for workers; parking space for vehicles and equipment; and sites for material delivery and storage, fabrication assembly of towers, cross arms and other hardware, concrete batch plants, and stations for equipment maintenance. Each MUA is approved to be approximately 30 acres in size. After construction is complete, MUAs shall be restored to preconstruction conditions in accordance with Condition OPR-GS-03 (General Standard of Review Condition 9), as discussed in applicable sections of this order.

Helicopter operations are approved at some multi-use areas. Helicopters will be used for delivery of construction laborers, equipment, and materials to structure sites; transmission structure placement; hardware installation; and wire stringing operations. Helicopters may also be used to support the construction and administration and management (either the certificate holder or the construction contractor or both).

Gasoline, diesel fuel, crankcase oil, lubricants, and cleaning solvents will be stored at MUAs. Diesel fuel tanks must be stored within secondary containment and each station must be equipped with a spill kit.

# Temporary Pulling and Tensioning Sites and Light-Duty Fly Yards

The facility is approved to include up to 299 temporary pulling and tensioning sites, approximately every 1.5 to two miles along the ROW and at angle points greater than 30 degrees. Temporary pulling and tensioning sites are approved to be located on approximately five acres at each end of the wire section to accommodate required equipment.<sup>4</sup> Equipment at pulling and tensioning sites is approved to include tractors and trailers with spooled reels that hold the conductors and trucks with the tensioning equipment.

Four pulling and tensioning sites are approved to include light-duty fly yards (within Umatilla, Baker and Malheur counties). All of the equipment and activities approved to occur at a multiuse area could also occur at a light-duty fly yard, except that oil, gas and explosive storage would not occur and no batch plants would be located at the light-duty fly yards within the pulling and tensioning sites. The light-duty fly yards are approved to be approximately five-acre sites spaced approximately 15 miles apart.

After construction is complete, the certificate holder shall restore temporary pulling and tensioning sites to pre-construction conditions in accordance with Condition OPR-GS-03 (General Standard of Review Condition 9).

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<sup>&</sup>lt;sup>4</sup> B2HAPPDoc3-3 ASC 02a\_Exhibit\_B\_Project Description\_ASC 2018-09-28, Section 3.3.3.

# 3.2 Facility Routes and Components by County/City

# **Morrow County**

The approved transmission line route crosses approximately 47.5 miles in Morrow County beginning at the Longhorn Station and includes various other components, as presented in Table 5, Approved Route Features – Morrow County below.

Table 5: Approved Route Features – Morrow County

Project Features	Number of Sites*	
Towers – Single Circuit 500-kV Lattice	147	
Towers – Single Circuit 500-kV H-Frame	73	
Towers – Single Circuit 500-kV 3-Pole Dead-end	1	
Communication Station(s)	1	
Light Duty Fly Yards	0	
Multi-Use Areas	5	
Pulling and Tensioning Sites	39	
Station	1	
Access Roads	Total Miles*	
Existing, 21-70% Improved	<del>19.4-</del> 20.3	
Existing, 71-100% Improved	10.8	
New, Bladed	<del>1.4</del> 3.2	
New, Primitive	<del>10.6</del> 10.7	
Crossings by Approved Route	Number of Crossings*	
High-Voltage Transmission Line Crossings <sup>1</sup>	1	
Existing Road Crossings <sup>2</sup>	3	
Existing Railroad Crossings <sup>3</sup>	1	

<sup>&</sup>lt;sup>1</sup> Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV.

The facility is approved to include construction and operation of the Longhorn Station, located at the northern terminus of the transmission line in Morrow County.

The facility includes three two approved alternative transmission routes in Morrow County.

**Umatilla County** 

<sup>&</sup>lt;sup>2</sup> Source: Esri (2013); includes Interstate, federal, and state highways.

<sup>&</sup>lt;sup>3</sup> Source: Oregon Department of Transportation (2013).

<sup>\*</sup> Approximate.

The approved transmission line route crosses approximately 40.8 miles in Umatilla County, as presented in Table 6, *Approved Route Features – Umatilla County* below.

Table 6: Approved Route Features – Umatilla County

Project Features	Number of Sites*	
Towers – Single Circuit 500-kV Lattice	161	
Communication Station(s)	2	
Light Duty Fly Yards	1	
Multi-Use Areas	7	
Pulling and Tensioning Sites	41	
Station	0	
Access Roads	Total Miles*	
Existing, 21-70% Improved	<del>15.6</del> 17.0	
Existing, 71-100% Improved	21.2	
New, Bladed	<del>5.1</del> -7.1	
New, Primitive	7.4	
Crossings by Approved Route	Number of Crossings*	
High-Voltage Transmission Line Crossings <sup>1</sup>	0	
Existing Road Crossings <sup>2</sup>	1	
Existing Railroad Crossings <sup>3</sup>	0	
Source: ABB Ventyx (2016) and Idaho Power Company; includes only tr Source: Esri (2013); includes Interstate, federal, and state highways.	ransmission lines over 69 kV.	

<sup>&</sup>lt;sup>3</sup> Source: Oregon Department of Transportation (2013).

Source: B2HAPPDoc3-9 ASC 03\_Exhibit C\_Project\_Location\_ASC 2018-09-28, Table C-3.

# **Union County**

The approved transmission line route crosses approximately 39.9 miles of land in Union County and includes various other components, as presented in Table 7, *Approved Route Features – Union County* below.

Table 7: Approved Route Features – Union County

Project Features	Number of Sites*
Towers – Single Circuit 500-kV Lattice	169
Communication Station(s)	2
Light Duty Fly Yards	0
Multi-Use Areas	3
Pulling and Tensioning Sites	43
Station	0

<sup>\*</sup> Approximate.

Table 7: Approved Route Features - Union County

Project Features	Number of Sites*  Total Miles*		
Access Roads			
Existing, 21-70% Improved	<del>31.1</del> 31.4		
Existing, 71-100% Improved	<del>6.</del> 4 6.5		
New, Bladed	<del>7.2</del> 8.6		
New, Primitive	0.4		
Crossings by Approved Route	Number of Crossings*		
High-Voltage Transmission Line Crossings <sup>1</sup>	3		
Existing Road Crossings <sup>2</sup>	4		
Existing Railroad Crossings <sup>3</sup>	3		
Is ADDV - 1204S) THE D. C			

 $<sup>^{1}</sup>$  Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV.

Source: B2HAPPDoc3-9 ASC 03\_Exhibit C\_Project\_Location\_ASC 2018-09-28, Table C-4.

The Morgan Lake alternative is the only alternative route in Union County and was developed based on input from landowners. The Morgan Lake alternative is approved to include one alternative communication station in Union County.

# Baker County

The approved transmission line route crosses approximately 68.4 miles of land in Baker County and includes various other components, as presented in Table 8, *Approved Route Features* – *Baker County* below.

Table 8: Approved Route Features – Baker County

Project Features	Number of Sites*
Towers – Single Circuit 500-kV Lattice	281
Towers – Single Circuit 230-kV H-Frame	5
Towers – Single Circuit 230-kV 3-Pole Dead-end	4
Communication Station(s)	2
Light Duty Fly Yards	1
Multi-Use Areas	6
Pulling and Tensioning Sites	61
Station	0
Access Roads	Total Miles
Existing, 21-70% Improved	<del>41.0</del> 44.0

<sup>&</sup>lt;sup>2</sup> Source: Esri (2013); includes Interstate, federal, and state highways.

<sup>&</sup>lt;sup>3</sup> Source: Oregon Department of Transportation (2013).

<sup>\*</sup> Approximate.

Table 8: Approved Route Features - Baker County

Project Features	Number of Sites*
Existing, 71-100% Improved	<del>22.2</del> 24.0
New, Bladed	<del>22.2</del> 23.5
New, Primitive	<del>6.0</del> 6.2
Crossings by Approved Route	Number of Crossings*
High-Voltage Transmission Line Crossings <sup>1</sup>	9
Existing Road Crossings <sup>2</sup>	3
Existing Railroad Crossings <sup>3</sup>	1

The facility includes two approved alternative transmission routes in Baker County.

Source: B2HAPPDoc3-9 ASC 03 Exhibit C Project Location ASC 2018-09-28, Table C-5.

# Malheur County

\* Approximate.

<sup>3</sup> Source: Oregon Department of Transportation (2013).

The approved transmission line route crosses approximately 74.1 miles of land in Malheur County and includes various other components, as presented in Table 9, *Approved Route Features – Malheur County* below.

Table 9: Approved Route Features – Malheur County

Project Features	Number of Sites*
Towers – Single Circuit 500-kV Lattice	327
Towers – Single Circuit 500-kV H-Frame	6
Towers – Single Circuit 500-kV 3-Pole Dead-end	3
Towers – Single Circuit 138-kV H-Frame	8
Towers – Single Circuit 138-kV 3-Pole Dead-end	3
Communication Station(s)	3
Light Duty Fly Yards	2
Multi-Use Areas	9
Pulling and Tensioning Sites	83
Station	0
Access Roads	Total Miles*
Existing, 21-70% Improved	4 <del>1.7</del> 43.6
Existing, 71-100% Improved	<del>12.8</del> 14.3

Table 9: Approved Route Features – Malheur County

Project Features	Number of Sites*
New, Bladed	<del>53.1</del> 56.8
New, Primitive	<del>13.8</del> 14.1
Crossings by Approved Route	Number of Crossings*
High Voltage Transmission Line Crossings <sup>1</sup>	4
Existing Road Crossings <sup>2</sup>	2
Existing Railroad Crossings <sup>3</sup>	1

<sup>&</sup>lt;sup>2</sup> Source: Esri (2013); includes Interstate, federal, and state highways.

The facility includes one approved alternative route in Malheur County, the Double Mountain alternative.

City of North Powder

Facility components approved within City of North Powder include an approximately 27.2-acre portion of a multi-use area.

City of Huntington

Facility components approved within City of Huntington include one multi-use area.

# 4.0 Facility Development

#### 4.1 Construction

This site certificate authorizes a 4-year construction duration. Construction will generally occur between 7 a.m. and 7 p.m., Monday through Saturday. Additional hours may be necessary to make up schedule deficiencies or to complete critical construction activities.

Construction activities could occur simultaneously across the entirety of the 300-mile transmission line route. Construction activities will generally include the following phases:

#### Phase I - Civil construction

 Activities along the transmission line will involve clearing the corridor and constructing access roads and, if applicable, harvestable timber will be cleared then hauled off.

# Phase II - Foundation Construction

 Foundations will be constructed at each structure site to support the steel towers. Track mounted drills and excavators will be mobilized to each structure site to excavate the

Source: Oregon Department of Transportation (2013).

<sup>\*</sup> Approximate.

Source: B2HAPPDoc3-9 ASC 03 Exhibit C Project Location ASC 2018-09-28, Table C-6.

site and concrete trucks will then deliver concrete to the sites to construct the foundations.

#### Phase III - Structure Erection

Steel lattice towers will be assembled at each site and erected on the foundations.
 Material will be delivered via flatbed trucks to each structure site and unloaded with forklifts and cranes where it will be assembled in pieces in the work area around the foundations.

## Phase IV - Conductor Pulling/Tensioning

O Conductor will be pulled along the corridor and through the structures via helicopters while large man lift trucks provide work crews access to each structure.<sup>5</sup>

Construction will include approximately 437 workers and crews for the following activities: substation construction, ROW clearing, roads/pad grading, foundations, tower lacing, tower setting, wire stringing, restoration, blasting, materials management, mechanic & equipment management, refueling, dust control, construction inspection, materials testing, environmental compliance, and surveyors.

Construction will include the following vehicular trips:

- Up to 486 one-way worker trips per day
- Up to 620 one-way light construction trips per day
- Up to 188 one-way heavy construction trips per day

Limits of temporary and permanent disturbance by facility components are established in Table 10 below.

Table 10: Site Boundary and Temporary/Permanent Disturbance Areas by Facility Component

Component	Length or Count	Site	Construction	Operations
		Boundary <sup>1</sup>	Disturbance	Disturbance
	Transmiss	ion Lines		
Single-Circuit 500-kV	270.8 miles (Approved Route)/ 33.3 miles (Approved Alternatives)	500 feet (width)	_2	_2
Single-Circuit 230-kV	0.9 mile (Approved Route)	500 feet (width)	_2	_2
Single-Circuit 138-kV	1.1 miles (Approved Route)	500 feet (width)	_2	_2
Transmission Structures				

<sup>&</sup>lt;sup>5</sup> B2HAPPDoc13 DPO IPC Responses to Select DPO Comments Rec'd by 2019-11-07; B2HAPP DPO IPC Responses - City of La Grande comments 2019-10-09.

Boardman to Hemingway Transmission Line Site Certificate September 2022

Table 10: Site Boundary and Temporary/Permanent Disturbance Areas by Facility Component

Component	Length or Count	Site Boundary <sup>1</sup>	Construction Disturbance	Operations Disturbance
500-kV Lattice	1,085 (Approved Route)/ 118 (Approved Alternative)	_3	250 x 250 feet (1.4 acres)	50 x 50 feet (0.06 acre)
500-kV H-Frame (NWSTF area)	73 (Approved Route)/ 34 (Approved Alternative)	_3	250 x 90 feet (0.5 acres) on NWSTF / 250 x 150 feet (0.9 acres) off	10 x 40 feet (0.001 acre)
500-kV H-Frame (Birch Creek area)	6 (Approved Route)	_3	250 x 250 feet (1.4 acre)	10 x 40 feet (0.001 acre)
500-kV Y-Frame	8 (Approved Alternative)	_3	Charles and the state of the st	8 x 8 feet (0.001 acre)
500-kV 3-Pole Dead- end (NWSTF area)	1 (Approved Route)/ 2 (Approved Alternative)	_3	250 x 90 feet (0.5 acre)	10 x 90 feet (0.02 acre)
500-kV 3-Pole Dead- end (Birch Creek area)	3 (Approved Route)	_3	250 x 250 feet (1.4 acre)	10 x 90 feet (0.02 acre)
500-kV H-Frame Dead- end (NWSTF area)	3 (Approved Alternative)	_3	250 x 90 feet (0.5 acre)	10 x 50 feet (0.01 acre)
230-kV H-Frame	5 (Approved Route)	_3	250 x 100 feet (0.6 acre)	25 x 5 feet (0.01 acre)
230-kV H-Frame (Removal)	9 (Approved Route)	_3	150 x 100 feet (0.3 acre)	_4
230-kV 3-Pole Dead- end	4 (Approved Route)	_3	250 x 150 feet (0.6 acre)	40 x 130 feet (0.1 acre)
138-kV H-Frame	8 (Approved Route)	_3	150 x 250 feet	16.5 x 5 feet (0.001 acre)
138-kV H-Frame (Removal)	10 (Approved Route)	_3	100 x 100 feet (0.2 acre)	_4
138-kV 3-Pole Dead- end	3 (Approved Route)	_3	250 x 150 feet (0.9 acre)	30 x 130 feet (0.09 acre)
69-kV H-Frame (Removal)	94 (Approved Route)	_3	90 x 90 feet (0.2 acre)	_4
	Stat	ions		
Longhorn	1 Access	188.9	24.4 acres	19.6 acres

Table 10: Site Boundary and Temporary/Permanent Disturbance Areas by Facility Component

Component	Length or Count	Site Boundary <sup>1</sup>	Construction Disturbance	Operations Disturbance
Existing Road, Moderate Improvements (21-70%)	148.8 miles (Approved Route)/ 13.2 miles (Approved Alternatives)	100 feet (width)	16 feet (width)	14 feet (width)
Existing Road, Extensive Improvements (71-100%)	73.4 miles (Approved Route)/ 6.3 miles (Approved Alternative)	100 feet (width)	30 feet (width)	14 feet (width)
New, Bladed	88.8 miles (Approved Route)/ 12.8 miles (Approved Alternative)	200 feet (width)	35 feet (width)	14 feet (width)
New, Primitive	117.5 miles (Approved Route)/ 12.8 miles (Approved Alternatives)	200 feet (width)	16 feet (width)	10 feet (width)
Permanent Facilities	250			
Communication Station	10 (Approved Route)/ 2 (Approved Alternative)	_2	100 x 100 feet (0.2 acre)	75 x 75 feet (0.1 acre)
Distribution Power Lines to Communication Station	7 (Approved Route)/ 2 (Approved Alternative)	50 feet (width)	25 feet (width)	14 feet (width)
	Temporary	Facilities	·	24
Multi-use Areas	30 (Approved Route)/ 4 (Approved Alternative)	Discrete site boundary; discontiguo us from	23 acres	-
Light Duty Fly Yards	4 (Approved Route)	Discrete site boundary; adjacent to transmissio	5 acres	-

Table 10: Site Boundary and Temporary/Permanent Disturbance Areas by Facility Component

Component	Length or Count	Site	Construction	Operations
Component	Length of Count	Boundary <sup>1</sup>	Disturbance	Disturbance
		Discrete		
Pulling and	299 (Approved Route)/	site		
Tensioning Sites	32 (Approved Alternative)	boundary;	4 acres	-
		adjacent to		
		transmissio		

 $<sup>^{1}</sup>$  Site Boundary size may be less than indicated in specific areas to avoid impacts to protected areas or for other reasons.

# 4.2 Operations and Maintenance

Operations and maintenance (O&M) activities shall include routine inspection and maintenance of the transmission line, in compliance with the Transmission Maintenance and Inspection Plan (TMIP) (see Condition OPR-OE-01).

In accordance with the TMIP, three types of line maintenance patrols will be conducted: routine line patrols/inspections, unscheduled emergency line patrols, and aerial vegetation patrols. The routine line patrols shall include a detailed visual inspection of the entire line conducted at least once per year.

Emergency line patrols shall be performed in response to any unexplained system outage or interruption, or whenever requested by a dispatcher, to identify major structural failures or issues.

Aerial vegetation patrols shall be conducted by a transmission utility arborist to identify and manage vegetation encroachments that threaten the transmission lines.

Transmission Patrolmen shall patrol and inspect the transmission lines at a minimum once a year to identify any transmission defects and any vegetation hazards that may develop between vegetation clearing cycles.

The TMIP requires that the certificate holder complete comprehensive 10-year maintenance inspection at least every 10-years.

O&M activities will also include short- and long-term monitoring and minimization measures for noxious weeds, restoration/reclamation, revegetation and habitat enhancement, as required by

 $<sup>^2</sup>$  No temporary or permanent disturbance expected along centerline, other than for specific facility features indicated below.

<sup>&</sup>lt;sup>3</sup> Component will be sited entirely within the site boundary.

<sup>&</sup>lt;sup>4</sup> No permanent disturbance expected once existing towers are removed.

<sup>&</sup>lt;sup>5</sup> See the Road Classification Guide and Access Control Plan (Exhibit B, Attachment B-5) for more information about road types.
<sup>6</sup> Existing roads with no substantial improvements are defined as existing roads that require improvements along 20 percent or less of the entire road segment. These roads have minimal to no temporary or permanent disturbance impacts beyond their existing road surface/profile, are not included in site boundary.

 $<sup>^{7}</sup>$  Certificate holder will construct distribution lines to communication stations within their service territory.

site certificate conditions provided in Section 5.0 of this site certificate.

# 4.3 Retirement/Decommissioning

The certificate holder shall retire or decommission the facility based on a retirement to be approved by the Council in accordance with the requirement of OAR 345-027-0110 and applicable conditions provided in Section 5.6 of this site certificate.

#### 5.0 Site Certificate Conditions

#### 5.1 Condition Format

The conditions in Sections 5.2 through 5.6 of this Site Certificate are organized and coded to indicate the phase of implementation, the standard the condition is required to satisfy, and an identification number (1, 2, 3, etc.). The table below presents a "key" for phase of implementation:

Key	Type of Conditions/Phase of Implementation
GEN	General Conditions: Design, Construction and Operation
PRE	Pre-Construction Conditions
CON	Construction Conditions
OPR	Operational Conditions
RET	Retirement Conditions

The standards are presented using an acronym; for example, the General Standard of Review is represented in the condition numbering as "GS"; the Soil Protection standard is represented in the condition numbering as "SP" and so forth.

For example, the coding of Condition GEN-GS-01 represents that the condition is a general condition (GEN) to be implemented during multiple phases including design, preconstruction, construction and/or operation of the facility, is required to satisfy the Council's General Standard of Review, and is condition number 1. The condition language also includes in brackets [] for the name of the condition as imposed in the Final Order on the Application (i.e. General Standard of Review Condition 1).

<sup>&</sup>lt;sup>6</sup> The identification number is not representative of an order that conditions must be implemented; it is intended only to represent a numerical value for identifying the condition.

# 5.2 General Conditions: Design, Construction and Operation

Condition Number	(Site certificate conditions for all standards and phases)
STANDARD: G	ENERAL STANDARD OF REVIEW (GS) [OAR 345-022-0000]
GEN-GS-01	<ul> <li>a. Construction Commencement Deadline: The certificate holder shall begin construction of the facility within four years after the effective date of the site certificate. Under OAR 345-015-0085(8), the site certificate is effective upon execution by the Council chair and the certificate holder. Prior to beginning construction as defined in OAR 345-001-0010(12), the certificate holder shall provide the Department written verification of the date that it will begin construction, acknowledge the commencement of the construction completion timeline, and confirm the construction completion deadline as stated in General Standard of Review Condition 1(b).</li> <li>b. Construction Completion Deadline: The certificate holder shall complete construction of the facility within four years after the construction commencement date outlined in General Standard of Review Condition 1(a). Within 90 days of construction completion, the certificate holder shall provide the Department written notification of the anticipated date of construction completion.</li> <li>c. Authorization to construct and operate facility components, including alternative transmission line routes, expires if not constructed by the construction completion deadline established in General Standard of Review Condition 1(b).</li> <li>[General Standard of Review Condition 1, Mandatory Condition OAR 345-025-0006(4)]</li> </ul>
GEN-GS-02	<ul> <li>a. At least 180 days prior to beginning construction (unless otherwise agreed to by the Department), the certificate holder shall submit to the Department a construction plan outlining construction phasing or segments, activities and schedules for completing construction of the facility consistent with the site certificate. Submission of pre-construction surveys or plans shall be conducted in accordance to site certificate conditions and may occur consistent with the phase or segment of the facility that is being constructed.</li> <li>b. Upon Department verification of compliance with applicable pre-construction requirements in the site certificate for any phase or segment of the facility, the Department shall notify the certificate holder in writing that pre-construction requirements have been met and they may commence construction for that phase or segment.</li> <li>[General Standard of Review Condition 2]</li> </ul>
GEN-GS-03	The certificate holder shall design, construct, operate, and retire the facility:  a. Substantially as described in the Final Order on the ASC and the site certificate;  b. In compliance with the requirements of ORS Chapter 469, applicable Council rules, and applicable state and local laws, rules and ordinances in effect at the

time the site certificate is issued; and c. In compliance with all applicable permit requirements of other state agencies. [General Standard of Review Condition 6; Mandatory Condition OAR 345-025-0006(3)]  If the certificate holder becomes aware of a significant environmental change or impact attributable to the facility, the certificate holder shall, as soon as possible, submit a written report to the Department describing the impact on the facility and any affected site certificate conditions. [General Standard of Review Condition 8; Mandatory Condition OAR 345-025-0006(6)]  Before any transfer of ownership of the facility or ownership of the site certificate holder, the certificate holder shall inform the Department of the proposed new owners. The requirements of OAR 345-027-0400 apply to any transfer of ownership that requires a transfer of the site certificate. [General Standard of Review Condition 10; Mandatory Condition OAR 345-025-0006(15)]  Subject to conditions of the site certificate, the certificate holder may construct the facility anywhere within the site boundary (approved corridor(s)), and as described in ASC Exhibit B and represented in ASC Exhibit C Attachment C-2 and C-3 mapsets and Amendment 1 mapsets. The approved corridors include:  a. The transmission line route extending approximately 273-miles through Morrow, Umatilla, Union, Baker, and Malheur counties;  b. West of Bombing Range Road alternative 1 and the west of Bombing Range Road alternative 2 in Morrow County;  c. Morgan Lake alternative in Union County; and  e. Amendment 1 site boundary changes [General Standard of Review Condition 11; Site-Specific Condition OAR 345-025-0010(5)]  STANDARD: ORGANIZATIONAL EXPERTISE (OE) [OAR 345-022-0010]  The certificate holder shall:  a. Prior to construction, notify the Department and affected counties of the identity and qualifications of the major design, engineering, and construction contractor(s) for the facility. The certificate holder shall select contractors that have substantial experien	c. In compliance with all applicable permit requirements of other state agencies. [General Standard of Review Condition 6; Mandatory Condition OAR 345-025-0006[3]]  If the certificate holder becomes aware of a significant environmental change or impact attributable to the facility, the certificate holder shall, as soon as possible, submit a written report to the Department describing the impact on the facility and any affected site certificate conditions. [General Standard of Review Condition 8; Mandatory Condition OAR 345-025-0006[6]]  Before any transfer of ownership of the facility or ownership of the site certificate holder, the certificate holder shall inform the Department of the proposed new owners. The requirements of OAR 345-027-0400 apply to any transfer of ownership that requires a transfer of the site certificate. [General Standard of Review Condition 10; Mandatory Condition OAR 345-025-0006[15]]  Subject to conditions of the site certificate, the certificate holder may construct the facility anywhere within the site boundary (approved corridor(s)), and as described in ASC Exhibit C Attachment C-2 and C-3 mapsets and Amendment 1 mapsets. The approved corridors include:  a. The transmission line route extending approximately 273-miles through Morrow Umatilla, Union, Baker, and Malheur counties;  b. West of Bombing Range Road alternative 1 and the west of Bombing Range Road alternative 2 in Morrow Country;  c. Morgan Lake alternative in Union County; and  d. Double Mountain alternative in Malheur Country; and  e. Amendment 1 site boundary changes  [General Standard of Review Condition 11; Site-Specific Condition OAR 345-025-0010[5]]  STANDARD: ORGANIZATIONAL EXPERTISE (OE) [OAR 345-022-0010]  The certificate holder shall:  a. Prior to construction, notify the Department and affected counties of the identity and qualifications of the facility. The certificate holder shall select contractors that have substantial experience in the design, engineering, and construction progress report required pursuant t		T
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GEN-GS-04  GEN-GS-04  GEN-GS-04  GEN-GS-04  GEN-GS-05  GEN-GS-06  GEN-GS-06  GEN-GS-06  GEN-GS-07  GEN-GS-07  GEN-GS-08  GEN-GS-08  GEN-GS-08  GEN-GS-08  GEN-GS-08  GEN-GS-08  GEN-GS-09  GEN-GS-09  GEN-GS-09  GEN-GS-09  GEN-GS-06	If the certificate holder becomes aware of a significant environmental change or impact attributable to the facility, the certificate holder shall, as soon as possible, submit a written report to the Department describing the impact on the facility and any affected site certificate conditions. [General Standard of Review Condition 8; Mandatory Condition OAR 345-025-0006(6)]    Before any transfer of ownership of the facility or ownership of the site certificate holder, the certificate holder shall inform the Department of the proposed new owners. The requirements of OAR 345-027-0400 apply to any transfer of ownership that requires a transfer of the site certificate. [General Standard of Review Condition 10; Mandatory Condition OAR 345-025-0006(15)]    Subject to conditions of the site certificate, the certificate holder may construct the facility anywhere within the site boundary (approved corridor(s)), and as described in ASC Exhibit B and represented in ASC Exhibit C Attachment C-2 and C-3 mapsets and Amendment 1 mapsets. The approved corridors include:   a. The transmission line route extending approximately 273-miles through Morrow Umatilla, Union, Baker, and Malheur counties;   b. West of Bombing Range Road alternative 1 and the west of Bombing Range Road alternative 2 in Morrow County;   c. Morgan Lake alternative in Union County; and   d. Double Mountain alternative in Malheur Countys; and   e. Amendment 1 site boundary changes   [General Standard of Review Condition 11; Site-Specific Condition OAR 345-025-0010(5)]    STANDARD: ORGANIZATIONAL EXPERTISE (OE) [OAR 345-022-0010]    The certificate holder shall:   a. Prior to construction, notify the Department and affected counties of the identity and qualifications of the major design, engineering, and construction contractor(s) for the facility. The certificate holder shall select contractors that have substantial experience in the design, engineering, and construction of similar facilities.   b. During construction, report to the Department in its semi		
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receives the notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions.  [Structural Standard Condition 4; Mandatory Condition OAR 345-025-0006(13)]  The certificate holder shall notify the Department, the State Building Codes Division and the Department of Geology and Mineral Industries promptly if shear zones, artesian aquifers, deformations or clastic dikes are found at or in the vicinity of the site. After the Department receives notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions.  [Structural Standard Condition 5; Mandatory Condition OAR 345-025-0006(14)]  STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]  The certificate holder shall:  a. Prior to construction of the facility, submit to the Department a final copy of an	CEN CC 03	those described in the application for a site certificate. After the Department
propose and implement corrective or mitigation actions.  [Structural Standard Condition 4; Mandatory Condition OAR 345-025-0006(13)]  The certificate holder shall notify the Department, the State Building Codes Division and the Department of Geology and Mineral Industries promptly if shear zones, artesian aquifers, deformations or clastic dikes are found at or in the vicinity of the site. After the Department receives notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions.  [Structural Standard Condition 5; Mandatory Condition OAR 345-025-0006(14)]  STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]  The certificate holder shall:  a. Prior to construction of the facility, submit to the Department a final copy of an	GEN-33-03	receives the notice, the Council may require the certificate holder to consult with the
[Structural Standard Condition 4; Mandatory Condition OAR 345-025-0006(13)]  The certificate holder shall notify the Department, the State Building Codes Division and the Department of Geology and Mineral Industries promptly if shear zones, artesian aquifers, deformations or clastic dikes are found at or in the vicinity of the site. After the Department receives notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions.  [Structural Standard Condition 5; Mandatory Condition OAR 345-025-0006(14)]  STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]  The certificate holder shall:  a. Prior to construction of the facility, submit to the Department a final copy of an		Department of Geology and Mineral Industries and the Building Codes Division to
The certificate holder shall notify the Department, the State Building Codes Division and the Department of Geology and Mineral Industries promptly if shear zones, artesian aquifers, deformations or clastic dikes are found at or in the vicinity of the site. After the Department receives notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions.  [Structural Standard Condition 5; Mandatory Condition OAR 345-025-0006(14)]  STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]  The certificate holder shall:  a. Prior to construction of the facility, submit to the Department a final copy of an		propose and implement corrective or mitigation actions.
and the Department of Geology and Mineral Industries promptly if shear zones, artesian aquifers, deformations or clastic dikes are found at or in the vicinity of the site. After the Department receives notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions.  [Structural Standard Condition 5; Mandatory Condition OAR 345-025-0006(14)]  STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]  The certificate holder shall: a. Prior to construction of the facility, submit to the Department a final copy of an		[Structural Standard Condition 4; Mandatory Condition OAR 345-025-0006(13)]
artesian aquifers, deformations or clastic dikes are found at or in the vicinity of the site. After the Department receives notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions. [Structural Standard Condition 5; Mandatory Condition OAR 345-025-0006(14)]  STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]  The certificate holder shall: a. Prior to construction of the facility, submit to the Department a final copy of an	GEN-SS-04	The certificate holder shall notify the Department, the State Building Codes Division
site. After the Department receives notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions.  [Structural Standard Condition 5; Mandatory Condition OAR 345-025-0006(14)]  STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]  The certificate holder shall: a. Prior to construction of the facility, submit to the Department a final copy of an		and the Department of Geology and Mineral Industries promptly if shear zones,
holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division to propose and implement corrective or mitigation actions.  [Structural Standard Condition 5; Mandatory Condition OAR 345-025-0006(14)]  STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]  The certificate holder shall: a. Prior to construction of the facility, submit to the Department a final copy of an		artesian aquifers, deformations or clastic dikes are found at or in the vicinity of the
Building Codes Division to propose and implement corrective or mitigation actions.  [Structural Standard Condition 5; Mandatory Condition OAR 345-025-0006(14)]  STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]  The certificate holder shall: a. Prior to construction of the facility, submit to the Department a final copy of an		site. After the Department receives notice, the Council may require the certificate
[Structural Standard Condition 5; Mandatory Condition OAR 345-025-0006(14)]  STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]  The certificate holder shall: a. Prior to construction of the facility, submit to the Department a final copy of an		holder to consult with the Department of Geology and Mineral Industries and the
STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]  The certificate holder shall: a. Prior to construction of the facility, submit to the Department a final copy of an		Building Codes Division to propose and implement corrective or mitigation actions.
The certificate holder shall:  GEN-SP-01  a. Prior to construction of the facility, submit to the Department a final copy of an		[Structural Standard Condition 5; Mandatory Condition OAR 345-025-0006(14)]
GEN-SP-01 a. Prior to construction of the facility, submit to the Department a final copy of an	STANDARD: S	OIL PROTECTION (SP) [OAR 345-022-0022]
	GEN-SP-01	The certificate holder shall:
ODEQ-issued NPDES 1200-C General Construction Permit, including the final		a. Prior to construction of the facility, submit to the Department a final copy of an
		ODEQ-issued NPDES 1200-C General Construction Permit, including the final

	<ul> <li>Erosion Sediment Control Plan (ESCP). The protective measures described in the 1200-C Permit Application and ESCP as provided in Attachment I-3 of the Final Order on the ASC, shall be included in the final ESCP.</li> <li>b. During construction of the facility, the certificate holder shall conduct all work in compliance with the NPDES 1200-C General Construction Permit and ESCP.</li> </ul>
	[Soil Protection Condition 1]
GEN-SP-02	<ul> <li>The certificate holder shall:</li> <li>a. Prior to construction of the facility, submit to the Department a final copy of a Construction Spill Prevention Control and Countermeasures Plan (SPCC Plan). The protective measures described in the draft Construction SPCC Plan, as provided in Attachment G-4 of the Final Order on the ASC, shall be included in the final SPCC Plan, unless otherwise approved by the Department.</li> <li>b. During construction of the facility, the certificate holder shall conduct all work in compliance with the final Construction SPCC Plan.</li> <li>[Soil Protection Condition 2]</li> </ul>
÷	Prior to operation, if the certificate holder is required by DEQ statutes or rules to
GEN-SP-03	implement a SPCC Plan for operation of the facility, the certificate holder shall submit to the Department a copy of a DEQ-approved operation-related SPCC Plan. The certificate holder shall maintain compliance with the operation-related SPCC Plan during operations at the Longhorn Station.  [Soil Protection Condition 3]
GEN-SP-04	<ul> <li>a. Prior to construction, in accordance with the OAR 345-025-0016 agency consultation process outlined in the draft Framework Blasting Plan (attachment G-5 of the Final Order on the ASC) the certificate holder shall finalize, and submit to the Department for approval, a final Blasting Plan. The final Blasting Plan shall meet all applicable federal, state and local requirements related to the transportation, storage, and use of explosives.</li> <li>b. Prior to construction, the certificate holder will consult with landowners regarding right-of-way acquisition, and during these consultations, the certificate holder will discuss with the landowner any blasting that the certificate holder plans to conduct on the landowner's property. If the landowner identifies a natural spring or well on the property, the certificate holder will notify the landowner that at the landowner's request, the certificate holder shall conduct pre-blasting baseline flow and water quality measurements for turbidity. The certificate holder shall compensate the landowner for adequate repair or replacement if damages to the flow or quality of the natural spring are caused by blasting.</li> <li>c. During construction, the certificate holder shall conduct all work in compliance with the final Blasting Plan approved by the Department.</li> </ul>
STANDARD	[Soil Protection Condition 4]  AND USE (LU) [OAR 345-022-0030]
	general Statement - American American and American and American Am
GEN-LU-01	For facility components in Morrow County, the certificate holder shall:

- a. Prior to construction of any phase or segment of the facility, provide to the Department a copy of the following Morrow County approved permits, if such permits are required by Morrow County zoning ordinances:
  - i. Zoning permit for facility components to be located in General Industrial (MG) and Port Industrial Zones.
  - ii. Flood plain development permit, for work in the Flood Plain Overlay Zone;
  - iii. Utility crossing permit;
  - iv. Access approach site permit; and
  - v. Construction permit to build on right-of-way.
- b. Prior to construction of a stream crossing at, or substantial road modification adjacent to, a Goal 5 stream including Sand Hollow Creek, Little Butter Creek, Butter Creek, and Matlock Creek, consult with ODFW on construction methods, measures to minimize riparian impacts, and measures to evaluate and monitor riparian impacts in order to demonstrate maintenance of 75 percent of vegetation layers or strata within the defined riparian zone. Consultation with DEQ and Morrow County Soil Conservation Services shall be completed if determined by the certificate holder, the Department, or ODFW to be necessary based on extent of potential water and erosion impacts. (MCZO Section 3.200(D)).
- c. During construction, the certificate holder shall comply with the conditions of permits and consultation requirements listed in (a) and (b), and if applicable, (d).
- d. During construction, if the certificate holder determines additional Countyapproved permits are required, the certificate holder shall provide to the Department a copy of those additional permits.
- e. Prior to construction of any phase or segment of the facility, the certificate holder shall provide to the Morrow County Weed Supervisor a list of the suppliers that will be supplying the aggregate used in construction in Morrow County. The certificate holder shall ensure that said suppliers provide the Morrow County Weed Supervisor reasonable access to the aggregate sites for inspection for weeds.

#### [Land Use Condition 1]

For facility components in Morrow County, the certificate holder shall design the facility to comply with the following setback distances and other requirements:

## Significant Resource Overlay Zone (MCZO Section 3.200(D)(3)(b))

 a. Buildings and the fixed bases of the transmission line towers shall be setback at least 100 feet from the high-water mark of all Goal 5 streams (i.e. Sand Hollow Creek, Little Butter Creek, Butter Creek and Matlock Canyon Creek).

# Sand Hollow Flood Pain Overlay Zone (MCZO Section 3.100(5.1-1)

b. Buildings and structures located within the multi-use area shall not be located within the Sand Hollow Flood Plain Overlay Zone (see ASC Exhibit K Figure K-21) unless anchored to prevent flotation, collapse or lateral movement of the structure.

In the EFU Zone (Based solely on certificate holder representations in the ASC)

## GEN-LU-02

- c. Buildings and the fixed bases of the transmission line towers shall be setback as follows:
  - Front yards shall be set back at least 20 feet from minor collector road rights-of-way, 30 feet from major collector road rights-of-way, 80 feet from arterial road rights-of-way, and 100 feet from intensive agricultural uses;
  - ii. Side yards shall be set back at least 20 feet from the property line, 30 feet for corner lots, and 100 feet from intensive agricultural uses; and
- iii. Rear yards shall be set back at least 25 feet from the property line, and 100 feet from intensive agricultural uses.
- d. Buildings and the fixed bases of the transmission line towers shall be set back at least 100 feet from the high-water mark of all streams and lakes.

#### In the General Industrial Zone (MCZO Section 3.070(D))

e. Buildings and the fixed bases of the transmission line towers shall be set back at least 50 feet from arterial road rights-of-way, 30 feet from collector road rights of-way, and 20 feet from lower-class road rights-of-way.

#### In the Port Industrial Zone (MCZO Section 3.073(D))

- f. Buildings associated with the Longhorn Station and multi-use area, and the fixed bases of the transmission line towers shall be setback as follows:
  - Front yards shall be set back at least 30 feet from the property line; buildings and structures shall be setback at least 90 feet from the centerline of any public, county, or state road;
- ii. Rear and side yards shall be set back at least 10 feet from the property line. [Land Use Condition 2]

#### For facility components in Umatilla County, the certificate holder shall:

- a. Prior to construction of any phase or segment of the facility, provide to the Department a copy of the following Umatilla-County issued permits:
  - Zoning Permit for each tax lot crossed by facility components evaluated as a Utility Facility Necessary for Public Service (UCDC 152.059) including transmission line, new roads, substantially modified roads, multi-use areas (including batch plant and helipads), and communication stations in EFUzoned land.
  - ii. Installation of Utilities on County and Public Roads Permit.

#### GEN-LU-03

- b. Road Approach and Crossing Permits as determined necessary by County Public Works Department. If after construction commencement the certificate holder determines additional County-approved permits are required, the certificate holder shall provide to the Department a copy of those additional permits.
- c. Prior to construction, provide to the Department and Umatilla County a copy of the ODEQ issued Air Contaminant Discharge or General Permit for the mobile batch plant.
- d. During construction, the certificate holder shall comply with all condition requirements of permits identified under (a), (b), and (c) of this condition.

#### [Land Use Condition 3]

For facility components located in Umatilla County, the certificate holder shall design the facility to comply with the following setback distances and other requirements: In All Zones:

- a. Buildings, the fixed bases of transmission line towers, and new access roads shall be set back from Class I streams at least 25-feet or one-half the stream width, whichever is greater.
- b. Permanent vegetation removal within the riparian zone of all Class I streams shall retain 75% of all layers or strata of vegetation.
- c. Within the transmission line right-of-way, a maximum of 25% of existing natural vegetation along streams, lakes, and wetlands may be removed, unless removal of a greater quantity of vegetation is necessary for reliability purposes.
- d. The certificate holder shall coordinate with the Oregon Department of Fish and Wildlife and Soil and Water Conservation District on minor drainage improvements necessary to ensure effective drainage on surrounding agricultural lands. Existing drainage ditches may be cleared to original specifications without review.
- e. Access points to multi-use areas and communication stations shall be limited to one every 200 feet.
- f. New roads that enter onto a public or county road or state or federal highway shall be constructed of at least similar if not the same material as the public or county road or state or federal highway, and the material shall extend at least 25 feet back from the edge of the existing travel lane surface.

#### In the EFU Zone (Based solely on certificate holder representations in the ASC):

- g. Buildings shall be setback as follows: (i) at least 30 feet from the property line or private road easement boundary; or (ii) at least 60 feet from the center line of the road, highway, or private road easement, whichever is greater.
- h. Buildings and the fixed bases of the transmission line towers shall be set back at least 100 feet from the high-water mark of all streams, lakes, and wetlands.
- i. Parking lots shall be designed and operated as follows:
  - areas used for standing and maneuvering of vehicles at the multi-use areas will have paved surfaces maintained adequately for all weather use and will be drained as to avoid flow of water across public sidewalks;
  - ii. parking spaces along the outer boundaries of any multi-use area parking lot will be contained by a curb at least four inches high and set back a minimum of four and one-half feet from the property line, or by a bumper rail; and
  - iii. artificial lighting, if provided, will not create or reflect glare in a residential zone or on any adjacent dwelling.

#### In the LI zone:

- j. The temporary multi-use area shall include visibility-obscuring fencing or shall setback the fence or limit areas of activity a minimum of 500 feet from adjacent public roads.
- k. The temporary multi-use area shall be designed to comply with front, side, and rear yard setbacks of 20 feet.

#### GEN-LU-04

	In the RTC Zone:  I. The temporary multi-use area shall include a visibility-obscuring fencing as			
	necessary to limit views of the area by travelling public and from surrounding			
	properties.			
	[Land Use Condition 5] For facility components in Union County, the certificate holder shall:			
GEN-LU-05	<ul> <li>a. Prior to construction of any phase or segment of the facility, provide to the Department a copy of the following Union County-approved permits, if such permits are required by Union County zoning ordinances: <ol> <li>Flood plain development permit;</li> <li>Road approach permit; and</li> <li>Work in county right-of-way permit.</li> <li>During construction, the certificate holder shall comply with conditions of permits listed in (a) and (c).</li> <li>During construction, if the certificate holder determines additional County-approved permits are required, the certificate holder shall provide to the Department a copy of those additional permits.</li> </ol> </li> <li>[Land Use Condition 6]</li> </ul>			
GEN-LU-06	Department a copy of those additional permits.  [Land Use Condition 6]  During construction of any phase or segment of the facility in Union County, the certificate holder shall construct the facility to comply with the following setback distances and other requirements:  In All Zones:  a. Buildings, the fixed bases of transmission line towers, and new access roads shall be set back from Class I streams at least 25-feet or one-half the stream width, whichever is greater.  b. Permanent vegetation removal within the riparian zone of all Class I streams shall retain 75% of all layers or strata of vegetation.  In the EFU Zone (Based solely on certificate holder representations in the ASC):  c. Buildings shall be setback as follows: (i) front yards shall be set back at least 20 feet from property lines and road rights-of-way.			

g. All signage shall comply with the provisions of UCZPSO 3.08.				
	In the Timber-Grazing Zone:			
	h. Buildings shall be setback as follows: (i) front and rear yards shall be set back			
	at least 20 feet from property lines and road rights-of-way; (ii) and side yards			
	shall be set back at least 10 feet from property lines and road rights-of-way.			
	<ul><li>i. All signage shall comply with the provision of UCZPSO 5.08.</li><li>[Land Use Condition 7]</li></ul>			
	For facility components in Baker County, the certificate holder shall:			
	a. Prior to construction in Baker County, the certificate holder shall provide to the			
	department a copy of the following Baker County-approved permits, if such			
	permits are required by Baker County ordinances:			
	i. Flood plain development permit;			
	ii. Road approach permit; and			
GEN-LU-07	iii. Work in county right-of-way permit.			
	b. If after commencement of construction the certificate holder determines			
	additional County-approved permits are required, the certificate holder shall			
	provide to the department a copy of those additional permits.			
	c. During construction, the certificate holder shall comply with conditions of			
	permits listed in (a) and (b).			
	[Land Use Condition 9]			
-	For facility components in Malheur County, prior to construction of any phase or			
	segment of facility components, the certificate holder shall:			
	a. Obtain one zoning permit for development of facility components in both the			
	EFU and ERU zone, and one zoning permit for development of facility			
	components in the Heavy Industrial (C-12) zone; copies of zoning permits shall			
	be provided to the Department.			
GEN-LU-08				
GEN-LU-08	b. Provide to the Department a copy of Malheur County-approved Flood plain			
	development permits for each location where development would occur			
	within a regulatory floodplain.			
	c. If after construction commencement, the certificate holder determines			
	additional County-approved permits are required, the certificate holder shall			
	provide a copy of those permits to the Department.			
	[Land Use Condition 11]			
	For facility components in Malheur County, the certificate holder shall design the			
	facility to comply with the following setback distances and other requirements:			
GEN-LU-09	In the EFU and ERU Zones (Based solely on certificate holder representations in the			
	ASC):			
	a. Buildings shall be setback as follows:			
	i. at least 40 feet from a street or road right-of-way; and			
	ii. at least 15 feet from any other property line.			
	b. No sight obscuring fence exceeding three feet in height shall be placed within			
	the 40-foot street setback, also within this setback shrubbery other than trees			
	shall be maintained at heights not exceeding three feet.			
	[Land Use Condition 12]			

GEN-LU-10	For the multi-use area in City of North Powder, the certificate holder shall design the site to comply with the following setback distance and other requirements:  In the Commercial Interchange Zone  a. All signs shall comply with NPZO 4.04(B) development standards (ASC Exhibit K p. K-275)  b. Based solely on certificate holder representations in ASC, buildings shall not exceed 45 feet in height and shall be setback per NPZO Section 4.03 (ASC Exhibit K p. K-277):  i. Front yards shall be set back at least 30 feet from property lines; ii. Side yards shall be setback at least 20 feet from a Residential Zone, street, or corner lot; and iii. Rear yards shall be set back at least 20 feet from a Residential Zone.  [Land Use Condition 13]	
GEN-LU-11	<ul> <li>The certificate holder shall:</li> <li>a. Prior to construction of any phase or segment of the facility, in accordance with the OAR 345-025-0016 agency consultation process outlined in the draft Agriculture Assessment and Mitigation Plan (Attachment K-1 of the Final Order on the ASC), submit to the Department a final Agricultural Assessment and Mitigation Plan.</li> <li>b. During construction and operation of any phase or segment of the facility, implement the Agriculture Mitigation Plan as finalized per sub(a) of this condition.</li> <li>c. During operation, implement a post-construction monitoring plan to identify any remaining soil and agricultural impacts associated with construction that require additional restoration or mitigation, in accordance with Section 7.0 of the Agricultural Mitigation Plan, Attachment K-1 of the Final Order on the ASC.</li> <li>[Land Use Condition 14]</li> </ul>	
GEN-LU-12	<ul> <li>The certificate holder shall limit its transmission line right-of-way in Goal 4 forest lands to no wider than 300 feet.</li> <li>a. During construction, the certificate holder shall limit its use of the portion of the transmission line right-of-way located beyond the center 100 feet to vegetation maintenance activities.</li> <li>b. During operation, the certificate holder shall limit its use of the portion of the transmission line right-of-way located beyond the center 100 feet to vegetation maintenance activities.</li> <li>[Land Use Condition 15]</li> </ul>	
GEN-LU-13	The certificate holder shall:  a. Prior to construction, in accordance with the OAR 345-025-0016 agency consultation process outlined in the draft Right-of-Way Clearing Assessment  (Attachment K-2 of the Final Order on the ASC), submit to the Department for	

GEN-PA-01

GEN-PA-02

GEN-RT-01

Department.

b. During construction, the certificate holder shall conduct all work in compliance with the final Right-of-Way Clearing Assessment.

[Land Use Condition 16]

#### STANDARD: PROTECTED AREA (PA) [OAR 345-022-0040]

During design and construction of the facility, the certificate holder must:

- a. Coordinate construction activities in Ladd Marsh Wildlife Area with the Wildlife Area manager.
- b. Provide evidence to ODFW of a determination of eligibility and findings of effect pursuant to Section 106 NRHP compliance for the facility and the final HPMP for the portion of the facility that would cross Ladd Marsh Wildlife Area subject to confidential material submission materials.

[Protected Areas Condition 1]

# During design and construction of the facility, if the Morgan Lake alternative route is selected, the certificate holder shall ensure that facility components are not sited within the boundary of the Ladd Marsh Wildlife Area. The certificate holder shall provide to the Department a final design map for Union County demonstrating that the site boundary and facility components are located outside of the protected area boundary. [Protected Areas Condition 2]

#### STANDARD: RETIREMENT AND FINANCIAL ASSURANCE (RT) [OAR 345-022-0050]

The certificate holder must prevent the development of any conditions on the site that would preclude restoration of the site to a useful, non-hazardous condition to the extent that prevention of such site conditions is within the control of the certificate holder.

[Retirement and Financial Assurance Condition 1, Mandatory Condition OAR 345-025-0006(7)]

#### STANDARD: FISH AND WILDLIFE HABITAT (FW) [OAR 345-022-0060]

The certificate holder shall:

- a. Prior to construction of a phase or segment of the facility, finalize, in accordance with the OAR 345-025-0016 agency consultation process outlined in the draft Reclamation and Revegetation Plan (Attachment P1-3 of the Final Order on the ASC), and submit to the Department for its approval a final Reclamation and Revegetation Plan for that phase or segment of the facility to be constructed. The protective measures described in the draft Reclamation and Revegetation Plan in Attachment P1-3 of the Final Order on the ASC shall be included and implemented as part of the final Reclamation and Revegetation Plan, unless otherwise approved by the Department. Components of the plan to be finalized are as follows. All components can be specific to the phase or segment of the facility to be constructed:
  - Habitat (type/subtype) and disturbance impact (acres) assessment based on final facility design and layout and preconstruction field verification of disturbance areas.

GEN-FW-01

#### Boardman to Hemingway Transmission Line Site Certificate September 2022

	ii. Identification and mapping of reclamation treatment and control			
	monitoring sites per habitat type.			
	iii. Identification and mapping of transect size and quantity, based on size of			
	disturbance areas, to be paired with treatment and control monitoring			
	sites per habitat type.			
	iv. Collection of preconstruction qualitative and quantitative data at			
	treatment and control monitoring sites.			
	v. Development of site-specific data analysis protocol for photographs and a			
	standardized data-recording form.			
	vi. Identification, and confirmation of availability, of appropriate seed mixes			
	per impacted habitat type			
	b. Post-construction of a phase or segment of the facility, the certificate holder			
	shall conduct all work in compliance with the final Reclamation and Revegetation			
	Plan referenced in sub(a) of this condition.			
	[Fish and Wildlife Condition 1]			
	The certificate holder shall:			
	a. Prior to construction of a phase or segment of the facility, in accordance with the			
	OAR 345-025-0016 agency consultation process outlined in the draft Vegetation			
	Management Plan (Attachment P1-4 of the Final Order on the ASC), finalize and			
	submit to the Department for its approval, in consultation with ODFW, a final			
	Vegetation Management Plan. The protective measures described in the draft			
CEN EW 02	Vegetation Management Plan in Attachment P1-4 of the Final Order on the ASC,			
GEN-FW-02	shall be included and implemented as part of the final Vegetation Management			
	Plan, unless otherwise approved by the Department.			
	b. During construction, the certificate holder shall conduct all work in compliance with the final Vegetation Management Plan referenced in sub(a) of this			
	condition.			
	c. During operation, the certificate holder shall conduct all work in compliance with			
	the final Vegetation Management Plan referenced in sub(a) of this condition.			
	[Fish and Wildlife Condition 2]			
	The certificate holder shall:			
	a. Prior to construction of a phase or segment of the facility, in accordance with			
	the OAR 345-025-0016 agency consultation process outlined in the draft Noxious			
GEN-FW-03	Weed Plan(s) (Attachment P1-5 of the Final Order on the ASC), finalize, and			
	submit to the Department for its approval, a final Noxious Weed Plan. The			
	protective measures as described in the draft Noxious Weed Plan provided as			
	Attachment P1-5 to the Final Order on the ASC, shall be included and			
	implemented as part of the final Noxious Weed Plan, unless otherwise approved			
	by the Department.			
	b. During operation, the certificate holder shall conduct all work in compliance with			
	the final Noxious Weed Plan referenced in sub(a) of the condition.			
	[Fish and Wildlife Condition 3]			
GEN-FW-04	The certificate holder shall:			

a. Prior to construction of any phase or segment of the facility, finalize, and submit to the Department for its approval, a final Fish and Wildlife Habitat Mitigation Plan, based on the plan provided as Attachment P-6 of the Final Order on the ASC. The final Fish and Wildlife Habitat Mitigation Plan shall include the following, unless otherwise approved by the Department:

<u>Information To Be Included in Final Habitat Mitigation Plan, based on the phase or segment of the facility to be constructed:</u>

- i. The areas that were surveyed for biological resources;
- ii. The location of all facility components and related and supporting facilities;
- iii. The areas that will be permanently and temporarily disturbed during construction;
- iv. The protective measures described in the draft Fish and Wildlife Habitat Mitigation Plan in Attachment P-6 of the Final Order on the ASC; and
- v. The results of the biological surveys referenced in Fish and Wildlife Conditions 15 and 16.

<u>Final Habitat Mitigation Plan Shall Address the Following:</u> The final Fish and Wildlife Habitat Mitigation Plan shall address the potential habitat impacts through mitigation banking, an in-lieu fee program, development of mitigation projects by the certificate holder, or a combination of the same.

- i. To the extent the certificate holder shall develop its own mitigation projects, the final Habitat Mitigation Plan shall:
  - 1. Identify the location of each mitigation site, including a map of the same:
  - 2. Identify the number of credit-acres that each mitigation site will provide for the certificate holder;
  - 3. Include a site-specific mitigation management plan for each mitigation site that provides for:
    - A. A baseline ecological assessment;
    - B. Conservation actions to be implemented at the site;
    - C. An implementation schedule for the baseline ecological assessment and conservation actions;
    - D. Performance measures;
    - E. A reporting plan; and
    - F. A monitoring plan.
- ii. To the extent the certificate holder shall utilize a mitigation bank or inlieu fee program, the final Habitat Mitigation Plan shall:
  - 1. Describe the nature, extent, and history of the mitigation bank or inlieu fee program; and
  - 2. Identify the number of credit-acres that each mitigation site will provide for the certificate holder.
- Oregon's Elk Mitigation Framework shall be used to calculate the amount of elk habitat compensatory mitigation required for the facility.
- iv. The final Fish and Wildlife Habitat Mitigation Plan may be amended

	from time to time by agreement of the certificate holder and the Department. Such amendments may be made without amendment to the site certificate. The Council authorizes the Department to agree to amendments of the plan and to mitigation actions that may be required under the plan; however, the Council retains the authority to approve, reject, or modify any amendment of the plan agreed to by the Department.  b. During construction, the certificate holder shall commence implementation of the conservation actions set forth in the final Fish and Wildlife Habitat Mitigation Plan referenced in sub(a) of this condition. [Fish and Wildlife Condition 4]			
GEN-FW-05	Prior to construction of any phase or segment of the facility, the certificate holder shall train all construction personnel on the protection of cultural, paleontological, ecological, and other natural resources such as (a) federal and state laws regarding antiquities, paleontological resources, and plants and wildlife, including collection and removal; (b) the importance of these resources; (c) the purpose and necessity of protecting them; and (d) reporting and procedures for stop work. Prior to the training, the certificate holder must provide the Department with a copy of training materials that will be used such as Power Point slides, information hand-outs, maps, and other materials.  [Fish and Wildlife Condition 6]			
GEN-FW-06	Prior to and during construction, the certificate holder shall flag the following environmentally sensitive areas as restricted work zones:  a. State protected plant species;  b. Wetlands and waterways that are not authorized for construction impacts;  c. Areas with active spatial and seasonal restrictions; and  d. Category 1 habitat.  Prior to construction of a phase or segment of the facility, the certificate holder shall submit a mapset showing the location of environmentally sensitive areas and restricted work zones to the department for its approval. The certificate holder shall make the mapset available to all construction personnel.  [Fish and Wildlife Condition 7]			
GEN-FW-07	During construction and operation, the certificate holder shall employ a speed limit of 25 miles per hour or less on private facility access roads.  [Fish and Wildlife Condition 8]			
GEN-FW-08	The certificate holder shall construct the transmission line to avian-safe design standards, consistent with the certificate holder's Avian Protection Plan (Idaho Power 2015) as provided in Attachment P1-9 of the Final Order on the ASC. Within 30 days of identification of an avian fatality within the site boundary, where predicted causal factor is electrocution or collision, the certificate holder shall report the species name and location identified (Milepost) and shall consult with ODFW and the Department on retrofit technologies or other adaptive management strategy to minimize fatality risk.  [Fish and Wildlife Condition 10]			

STANDARD: S	CENIC RESOURCES (SR) [OAR 345-022-0080]
	The certificate holder shall use dull-galvanized steel for lattice towers and non-
GEN-SR-01	specular conductors.
	[Scenic Resources Condition 1]
	If, at final facility design, the transmission line route crosses Ladd Marsh Wildlife
	Management Area in Union County, the certificate holder shall select transmission
GEN-SR-02	structures to be constructed between approximately Milepost 108 and Milepost 113
	with design modifications including Lattice-frames with a Natina finish.
	[Scenic Resources Condition 2]
	At final facility design, the certificate holder shall select transmission structures, to
	be constructed in the vicinity of the National Historic Oregon Trail Interpretive Center
	between approximately Milepost 145.1 and Milepost 146.6, with the following
	design modifications:
	a. H-frames;
	b. Tower height no greater than 130 feet; and
GEN-SR-03	c. Weathered steel (or an equivalent coating).
3217 317 33	Additionally, the certificate holder shall construct the facility using tower structures
	that meet the following criteria between approximately Milepost 146.6 and Milepost
	146.7:
	a. H-frames;
	b. Tower height no greater than 154 feet; and
	c. Weathered steel (or an equivalent coating).
	[Scenic Resources Condition 3]
	At final facility design, the certificate holder shall select transmission structures, to
CEN CD 04	be constructed in the vicinity of Birch Creek Area of Critical Environmental Concern
GEN-SR-04	between approximately Milepost 197.9 and Milepost 199.1, with design
	modifications including H-frame, with structure height not to exceed 100 feet.
STANDARD, U	[Scenic Resources Condition 4]  ISTORIC, CULTURAL, AND ARCHEOLOGICAL RESOURCES (HC) [OAR 345-022-0090]
	During final design and construction of the facility, the certificate holder shall design
GEN-HC-01	and locate facility components to avoid direct impacts to Oregon Trail/National
GEN-HC-01	Historic Trail resources consistent Attachment S-9 Historic Properties Management
	Plan (HPMP) of the Final Order on the ASC. [Historic, Cultural and Archeological Resources Condition 1]
	Prior to construction of a phase or segment of the facility, subject to confidential
GEN-HC-02	material submission procedures, and based on 1) new survey data from previously
	unsurveyed areas and 2) the final design of the facility, the certificate holder shall
	submit to the Department, the State Historic Preservation Office (SHPO), and
	applicable Tribal Governments, for review and Department approval a final Historic
	Properties Management Plan (HPMP) Attachment S-9 of the Final Order on ASC. The
	Department may engage its consultant to assist in review of the HPMP. The
	certificate holder shall conduct all construction activities in compliance with the final
	Department-approved HPMP.
	Department approved in itin.

[Historic, Cultural and Archeological Resources Condition 2]

#### STANDARD: RECREATION (RC) [OAR 345-022-0100]

## If the Morgan Lake alternative facility route is selected, the certificate holder shall construct the facility using tower structures that meet the following criteria for the transmission line that would be visible from Morgan Lake Park, specifically between milepost (MP) 5.0 to MP 8.0 of the Morgan Lake alternative, as shown on ASC Exhibit C, Attachment C-3, Map 8.

#### GEN-RC-01

- a. H-frames;
- b. Tower height no greater than 130 feet; and
- c. Weathered steel (or an equivalent coating).

[Recreation Condition 1]

#### STANDARD: PUBLIC SERVICES (PS) [OAR 345-022-0110]

At least 90 days prior to use of a helicopter(s) during construction, the certificate holder shall submit to the Department and each affected County Planning Department a proposed Helicopter Use Plan. The plan must be approved by the Department, in consultation with each county where helicopter use is proposed, prior to use of a helicopter during construction. The certificate holder shall conduct all work in compliance with the approved Helicopter Use Plan. The Helicopter Use Plan shall identify or provide:

- The type of helicopters to be used (all helicopters must be compliant with the noise certification and noise level limits set forth in 14 CFR § 36.11);
- b. The duration of helicopter use;
- c. Approximate helicopter routes to be used;
- d. Protected areas and recreation areas within two miles of the approximate helicopter routes;
- e. Roads or residences over which external loads will be carried;

## f. Multi-use areas and light-duty fly yards containing helipads shall be located: (i) in areas free from tall agricultural crops and livestock; (ii) at least 500 feet from organic agricultural operations; and (iii) at least 500 feet from existing dwellings on adjacent properties;

- g. Flights shall occur only between sunrise and sunset;
- At least 30 days prior to initiating helicopter operations at any multi-use area or light-duty fly yard, the certificate holder shall contact adjacent property owners within 1,000 feet of the relevant multi-use area or light-duty fly yard;
- i. At least 30 days prior to initiating helicopter operations, the certificate holder shall consult with the Oregon Department of Aviation regarding the preparation and posting of notices to airmen regarding the location and nature of work being performed. The notice will be posted at each of the public airports in the vicinity of the facility to alert other aviators of the location and timing of facility-related helicopter construction activities; and
- The certificate holder shall maintain a customer service telephone line to address, among other things, complaints regarding helicopter operations.

[Public Services Condition 3]

#### GEN-PS-01

Prior to construction of a facility phase or segment, in accordance with the OAR 345-025-0016 agency consultation process outlined in the plan (Attachment U-3 of the Final Order on the ASC), the certificate holder shall submit final Fire Prevention and Suppression Plan(s) to the Department for approval. The plan finalization process shall consider (a)(i) and (a)(ii) unless otherwise identified by a land management agency or other participating review agency:

- The protective measures as described in the draft Fire Prevention and Suppression Plan as provided in Attachment U-3 of the Final Order on the ASC and:
  - Wildfire training for onsite workers and facility personnel be conducted by individuals that are National Wildfire Coordination Group and Federal Emergency Management Agency certified.
  - ii. Specific seasonal work restrictions, onsite fire-fighting equipment and necessary fire protection resources based on: 1) documented evaluation of reasonably available sources related to wildfire risk and sensitive seasonal conditions such as high temperatures, drought and high winds; and 2) update Table PS-9 of the Final Order on the ASC based on information obtained from the LGRFPD on the number of full-time and volunteer employees, number and type of equipment/vehicles, and response times to the facility. Response time must consider LGRFPD crew mobilization time and access limitations (e.g., road condition, level of service and impact of multi-users from Morgan Lake Park, residents and emergency services.
- b. A description of the fire districts and rural fire protection districts that will provide emergency response services during construction and copies of any agreements between the certificate holder and the districts related to that coverage.
- c. All work must be conducted in compliance with the approved plan during construction and operation, as applicable, of the facility.

#### Public Services Condition 6]

#### The certificate holder shall:

#### a. Prior to operation, provide a copy of its Wildfire Mitigation Plan to the Department and each affected county which provides a wildfire risk assessment and establishes action and preventative measures based on the assessed operational risk from and of wildfire in each county affected by the facility.

- b. During operation, the certificate holder shall update the Wildfire Mitigation Plan on an annual basis, or frequency determined acceptable by the Department in consultation with the Oregon Public Utilities Commission.
- c. During operation, for the service territories the facility would be located within, the certificate holder shall provide to each of the fire districts and rural fire protection a contact phone number to call in the event a district needs to request an outage as part of a fire response.

#### GEN-PS-02

#### GEN-PS-03

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d. Any Wildfire Mitigation Plan required by the Oregon Public Utilities Commission shall be considered by EFSC as meeting the requirements of this condition.

[Public Services Condition 7]

#### STANDARD: WASTE MINIMIZATION (WM) [OAR 345-022-0120]

At least 90 days prior to construction of a facility phase or segment, the certificate holder shall submit to the Department a Construction Waste Management Plan. The Department must review and approve the plan prior to construction of a facility phase or segment. The site certificate holder shall conduct all work in compliance with the approved Plan. The Plan must address, at a minimum:

- The number and types of waste containers to be maintained at multi-use areas and pulling and tensioning sites;
- b. Waste segregation methods for recycling or disposal;
- Names and locations of appropriate recycling and waste disposal facilities, collection requirements, and hauling requirements to be used during construction;
- d. Recycling steel and other metal scrap;
- e. Recycling wood waste;
- f. Recycling packaging wastes such as paper and cardboard;
- g. Collecting non-recyclable waste for transport to a local landfill by a licensed waste hauler or by using facility equipment and personnel to haul the waste;
- Segregating all hazardous and universal wastes such as used oil, oily rags and oil- absorbent materials, mercury-containing lights and lead-acid and nickel cadmium batteries for disposal by a licensed firm specializing in the proper recycling or disposal of hazardous and universal wastes;
- When possible, discharging concrete truck rinse-out within foundation holes, completing truck wash-down off-site, and burying other concrete waste as fill on-site whenever possible; and
- j. For waste hauling and disposal within Morrow County, the certificate holder shall ensure its personal or third party contractors adhere to the applicable requirements in the Morrow County Solid Waste Management Ordinance Section 5.000 Public Responsibilities, 5.010 Transportation of Solid Waste and 5.030 Responsibility for Propose Disposal of Hazardous Waste which requires that all loads be covered and secured and that operators be responsible for hazardous waste disposal in accordance with applicable regulatory requirements.
- k. If required by county ordinance, solid waste transported on public roads must be covered and secured during transporting, including:
  - i. Loads which are totally contained within an enclosed vehicle or container;
  - ii. Loads of solid waste contained in garbage cans with tightly fitting lids, tied plastic bags or similar totally enclosed individual containers that are completely contained within the walls of a vehicle or container, such that no solid waste can reasonably be expected to escape during hauling;

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- iii. Loads of brush, building materials and similar bulky materials which are secured in or on the hauling vehicle or completely contained within the walls of a vehicle or container, such that none can reasonably be expected to escape during hauling; or
- iv. Loads consisting entirely of rock, concrete, asphalt paving, stumps and similar materials that are completely contained within the walls of a vehicle or container, such that none can reasonably be expected to escape during hauling.
- A requirement that the certificate holder report to the Department on the implementation of the Plan during construction must be included in the six month construction report required pursuant to OAR 345-026-0080(1)(a).

[Waste Minimization Condition 1]

#### STANDARD: SITING STANDARDS FOR TRANSMISSION LINES (TL) [DIVISION 24]

To reduce or manage human exposure to electromagnetic fields, the certificate holder shall design and construct:

- a. All aboveground 500-kV transmission lines with a minimum clearance of 34.5 feet from the ground under all operating conditions;
- b. All aboveground 230-kV transmission lines with a minimum clearance of 20 feet from the ground under all operating conditions; and
- c. All aboveground 138-kV transmission lines with a minimum clearance of 20 feet from the ground under all operating conditions.
- d. In areas where an aboveground transmission line will cross an existing transmission line, the certificate holder shall construct the transmission line at a height and separation that would ensure that alternating current electric fields do not exceed 9-kV per meter at one meter above the ground surface.
- e. The Department may authorize a lower conductor clearance in areas determined to not be accessible to the public or otherwise demonstrated by the applicant to be compliant with the standard.

[Siting Standards for Transmission Lines Condition 1]

#### a. The certificate holder shall design, construct, and operate the transmission lines, Longhorn Station, and communication stations in accordance with the requirements of the version of the National Electrical Safety Code that is most current at the time that final engineering of each of these components is completed; and

b. The certificate holder shall develop and implement a program that provides reasonable assurance that all fences, gates, cattle guards, trailers, or other objects or structures of a permanent nature in place at the time of construction and within the right-of-way, that could become inadvertently charged with electricity are grounded or bonded throughout the life of the line. The certificate holder shall be responsible for costs associated with grounding or bonding of permanent infrastructure in place at the time of construction.

[Siting Standards for Transmission Lines Condition 3, Site-Specific Condition OAR 345-

#### GEN-TL-01

#### GEN-TL-02

025-0010(4)]

#### STANDARD: NOISE CONTROL REGULATIONS (NC) [OAR 340-035-0035]

Prior to construction, the certificate holder will initiate discussions with the 41 NSR property owners at which it has estimated exceedances of the ambient antidegradation standard may occur identified in Attachment X-4 and/or X-5 of the Final Order on the ASC (NSR: 8, 9, 10, 11, 5002, 69, 70, 5004, 46, 118, 125, 5010, 5011, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 518, 111, 112, 132, 133, 5008, 5009, 113, and 115) to develop mutually agreed upon Noise Exceedance Mitigation Plans, specific to each NSR location. The site-specific Noise Exceedance Mitigation Plans will include agreed upon measures that would be implemented at the NSR location to minimize or mitigate the ambient antidegradation standard noise exceedance.

- a. If the certificate holder and the NSR property owner agree upon a specific Noise Mitigation Plan, the certificate holder will submit a signed acknowledgement from the property owner to the Department for its records.
- b. If an agreement between certificate holder and NSR property owner is not obtained, the certificate holder shall concurrently notify the Department and NSR property owner of the dispute and of Council review of the dispute to occur at the next regularly scheduled Council meeting, to the extent possible, from the date of the certificate holder's notice. The notice shall explain that the NSR property owner will be given an opportunity to provide comments to the Council on the dispute, unless the Council Chair defers the dispute review to the Department. Review of the dispute will be based on the information per sub(i) below, and any other relevant facts provided by the NSR property owner and will result in a determination of the appropriate mitigation measure(s), proportional to the facility operational noise levels in excess of the ambient degradation standard, as determined to occur at the NSR property. The Council or Department's determination of appropriate mitigation is not binding on the NSR property owner or certificate holder if the NSR property owner opts not to accept the mitigation.
  - i. At the time of issuance of the notice per (b) above, certificate holder will submit to the Department: (1) the mitigation measures it offered the NSR property owner, the mitigation measures that the NSR property owner requested and an explanation of the dispute; (2) a list of the dates that the certificate holder communicated with, or attempted to communicate with, the NSR property owners; and (3) the names, addresses, and phone
- c. In working with NSR property owners under this condition, certificate holder will propose corona-noise mitigation of installation of sound- attenuating windows for residential structures as follows:

numbers of the NSR owners.

 For NSRs where an 11 to 14 dBA sound level increase above ambient noise levels are expected, certificate holder will purchase and install sound attenuating windows with an STC rating of 25-40.

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- ii. For NSRs where a 15 dBA or greater sound level increase is expected, certificate holder will purchase and install sound attenuating windows with an STC rating of above 40.
- iii. If an owner of an NSR where an 11 dBA or greater sound level increase is expected provides a letter from a heath care provider indicating that health care provider's belief that the owner has a health condition that is exacerbated by increased sound levels, upon request, certificate holder will purchase and install sound attenuating windows with an STC rating of over 40 and would work with the NSR property owner to consider other mitigation options, as appropriate. During landowner consultations required under this condition, the certificate holder will specifically ask each landowner whether that landowner has a health condition that the landowner believes is exacerbated by elevated sound levels.
- iv. At the request of an NSR property owner, certificate holder will offer alternative mitigation proposals, including but not limited to performing air-sealing of the NSR residence, planting trees, or installing insulation.
- d. Prior to operation, the certificate holder will implement the mitigation measures agreed upon with the NSR property owners and/or as determined by EFSC or the Department to be the appropriate mitigation measures.

#### [Noise Control Condition 1]

a. After the Site Certificate has been issued and before landowner consultations contemplated in Condition 1, the certificate holder will prepare a new version of Attachment X-7, which will update landowner information and correct any errors (Updated Attachment X-7). The certificate holder will send notices to all landowners listed in Updated Attachment X-7, which notice shall: (a) inform the recipient that the recipient is the owner of an NSR; (b) provide the requirements and condition language of Noise Control Conditions 1 and 2 as adopted by the Council; and (c) provide a plain language summary of the steps designated in Noise Control Conditions 1 and 2. In addition, prior to construction, the certificate holder shall develop and submit to the Department an operational noise complaint response plan as well as distribute a simplified operational noise complaint response plan to the landowners listed in Updated Attachment X-7.

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- b. The plan shall specify that it is intended to address complaints filed by persons falling into one of the following categories: (1) the owner of an NSR property identified in Noise Control Condition 1, and for whom has received mitigation under Noise Control Condition 1, but who believes that exceedances (as measured at their NSR property) are occurring in a manner not otherwise allowed under Noise Control Condition 4 or Noise Control Condition 5; or (2) An owner of an NSR property within one mile of the site boundary who was not identified under Noise Control Condition 1 and who has not received mitigation from the certificate holder, but who nevertheless believes that exceedances above the ambient degradation standard have occurred at their NSR property.
- c. The plan shall include the following: Scope of the complaint response plan, including process for complaint filing, receipt, review and response. The scope

- shall clearly describe how affected persons will be provided necessary information for filing a complaint and receiving a response, and will specify the information that the complainant must include in its complaint, including the date the certificate holder received the complaint, the nature of the complaint, weather conditions of the date for which the complaint is based (such as wind speed, temperature, relative humidity, and precipitation), duration of perceived noise issue, the complainant's contact information, and the location of the affected property.
- d. The plan shall require that the certificate holder notify the Department within three working days of receiving a noise complaint related to the facility. The notification shall include the date the certificate holder received the complaint, the nature of the complaint, weather conditions of the date for which the complaint is based (such as wind speed, temperature, relative humidity, and precipitation) as described by the complainant, duration of perceived noise issue, the complainant's contact information, the location of the affected property, and a schedule of any actions taken or planned to be taken by the certificate holder (including inspection and maintenance actions, or actions taken or planned to be taken pursuant to the processes described in subsection (e) of this condition).
- e. The plan shall identify the following process if a noise complaint is received:
  - i. The certificate holder shall assess possible causes of the corona noise. If the complaint is received within the first 12 months of operation, the certificate holder will assess whether the corona noise is typical of noise that occurs during the transmission line "burn in period" (the first 12 months of operation) and ensure that it already has taken appropriate measures near that NSR to minimize corona noise that may occur during the burn in period (e.g., use conductors with a nonspecular finish/sandblasting of conductors to make them less reflective and clean them of manufacturing oils, protect the conductors to minimize scratching and nicking during construction). If the exceedance occurs during the burn-in period, and if the certificate holder complies with the requirements of this condition, the certificate holder will not be found to be in violation of its site certificate because of the exceedance.
  - ii. If it is determined the corona noise is not typical "burn in period" noise, the certificate holder will assess whether the noise exceeds the ambient antidegradation standard in a manner not otherwise allowed under Noise Control Condition 4 or Noise Control Condition 5. If the complainant's noise sensitive property or properties are included in Attachment X-5 of the Final Order on the ASC, the modeled sound level increases as presented in Attachment X-4 of the Final Order on the ASC may be relied upon to determine whether the corona noise exceeds the ambient antidegradation standard, unless the complainant voluntarily provides alternative noise data.

- iii. If the complainant's NSR property or properties are not included in Attachment X-5 of the Final Order on the ASC, the certificate holder shall model the sound level increases using the methods set forth in ASC Exhibit X, unless the complainant voluntarily provides alternative noise data.
- iv. If the complainant voluntarily provides alternative noise data and the data suggests an exceedance that had not previously been identified and mitigated, and/or an exceedance not otherwise allowed under Noise Control Condition 4 or Noise Control Condition 5, the complaint shall be verified through site specific sound monitoring conducted by an Oregon registered Professional Engineer, Board Certified by the Institute of Noise Control Engineering noise specialist, employed or contracted by the certificate holder, in accordance with NPCS-1 unless otherwise approved by the Department. If site specific sound monitoring is not authorized by the complainant, the certificate holder's modeling results may be relied upon to determine compliance.
- v. In the event of a dispute regarding complainant's noise data and the certificate holder's data from site specific sound monitoring, certificate holder shall request that EFSC, in consultation with the Department's noise consultant, if necessary, make the final determination regarding which data will be used to determine whether corona noise exceeds the ambient antidegradation standard and/or in a manner not allowed under Noise Control Condition 4 or Noise Control Condition 5. The EFSC Chair may direct the Department to make this determination.
- f. The plan shall specify that if it is determined pursuant to the process described in subsection (e) of this condition that corona noise at the complainant's NSR property exceeds the ambient antidegradation standard in a manner not allowed under Noise Control Condition 4 or Noise Control Condition 5, and/or exceeds the ambient antidegradation standard at an NSR property that had not previously been predicted to experience exceedances under Noise Control Condition 1, the certificate holder shall work with the NSR property owner to develop a mutually agreed upon mitigation plan to include agreed upon measures that would be implemented at the NSR location to minimize or mitigate the ambient antidegradation standard noise exceedance. To be clear, the fact that the certificate holder has received an exception or variance under Noise Control Conditions 4 and 5 does not excuse the certificate holder from providing mitigation under this condition.
  - i. If the NSR property was identified in Noise Control Condition 1 and has previously received mitigation by the certificate holder, and if it has been determined that the NSR property experiences exceedances not allowed under Noise Control Condition 4 or Noise Control Condition 5, the certificate holder will work with the complainant to identify supplemental mitigation measures, which may include any of the measures discussed in Noise Control Condition 1 or the ASC, or other measures requested by the complainant.

- ii. If the NSR property was not identified in Noise Control Condition 1 and has not been provided with mitigation by the certificate holder, certificate holder will work with the NSR property owner to identify appropriate mitigation measures, which may include any of the measures discussed in Noise Control Condition 1 or the ASC, or other measures requested by the landowner.
- iii. If, through the efforts described above, the certificate holder executes an agreement with the NSR property owner, the certificate holder will submit a signed acknowledgement from the property owner to the Department for its records. If an agreement between certificate holder and NSR property owner is not obtained, the certificate holder shall concurrently notify the Department and NSR property owner of the dispute and of Council review of the dispute to occur at the next regularly scheduled Council meeting, to the extent possible, from the date of the certificate holder's notice. The notice shall explain that the NSR property owner will be given an opportunity to provide comments to the Council on the dispute, unless the Council defers the dispute review to the Department. Review of the dispute will be based on the information per (iv) below, and any other relevant facts provided by the NSR property owner and will result in a determination of the appropriate mitigation measure(s), proportional to the facility operational noise levels in excess of the ambient degradation standard, as determined to occur at the NSR property. The Council or Department's determination of appropriate mitigation is not binding on the NSR property owner or certificate holder if NSR property owner opts not to accept the mitigation.
- iv. At the time of issuance of the notice per (iii) above, certificate holder will submit to the Department: (1) the mitigation measures it offered the NSR property owner, the mitigation measures that the NSR property owner requested and an explanation of the dispute; (2) a list of the dates that the certificate holder communicated with, or attempted to communicate with, the NSR property owners; and (3) the names, addresses, and phone numbers of the NSR owners.
- g. The certificate holder shall provide necessary information to the complainant to support understanding of corona noise, corona noise levels and effects, and of the process to verify actual noise levels of events resulting in complaints. If the complainant opts not to authorize the certificate holder to conduct monitoring, and it is otherwise determined pursuant to the process described in subsection (e) of this condition that corona noise does not exceed the ambient antidegradation standard, the noise complaint shall be considered fully resolved and no mitigation shall be required.

[Noise Control Condition 2]

#### STANDARD: REMOVAL FILL LAW (RF) [OAR 141-085-0500 through -0785]

GEN-RF-01 a. P

The certificate holder shall:

a. Prior to construction of a phase or segment of the facility, the certificate holder shall submit to the Department and Oregon Department of State Lands (DSL) a

- final Site Rehabilitation Plan (Plan), consistent with the draft Plan provided in Attachment J-2 of the Final Order on the ASC. The Department shall provide written verification of its review of the final Plan, confirming that the Plan is consistent with the draft Site Rehabilitation Plan.
- b. Following construction and during operation of a phase or segment of the facility, the certificate holder shall ensure that temporary impacts to wetlands and non-wetland waters of the state are restored in accordance with the final Plan.
- c. The Department will provide updates to Council on the certificate holder's implementation of the final Plan and of any Plan revisions at Council meetings, following submittal of the certificate holder's six-month construction progress report per General Standard of Review Condition 3 or annual report per General Standard of Review Condition 4.

#### [Removal Fill Condition 2]

#### The certificate holder shall:

- a. Prior to construction of a phase or segment of the facility, submit an updated final Compensatory Wetland and Non-Wetland Mitigation Plan (CWNWMP), consistent with the draft CWNWMP (Attachment J-1 to the Final Order on the ASC), for review and approval by the Department, in consultation with Department of State Lands (DSL). The Department shall provide written verification of its review and approval of the final CWNWMP. The final amount of wetland mitigation credit required shall be based on the final design configuration of the phase or segment of the facility and the estimated acres of wetlands and non-wetland waters of the state that would be permanently impacted, unless otherwise agreed to by the Department.
- Following construction and during operation of a phase or segment of the facility, the certificate holder shall implement the actions described in the final CWNWMP.

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- c. The Department will provide updates to Council on the certificate holder's implementation of the final CWNWMP and of any Plan revisions at Council meetings, following submittal of the certificate holder's six-month construction progress report per General Standard of Review Condition 3 or annual report per General Standard of Review Condition 4.
- d. The final CWNWMP version approved when the facility begins operation may be revised or updated from time to time by agreement of the certificate holder and the Oregon Energy Facility Siting Council. Such revisions or updates may be made without amendment of the site certificate. The Council authorizes the Department to agree to revisions or updates to this plan, in consultation with DSL. The Department shall notify the Council of all revisions or updates, and the Council retains the authority to approve, reject, or modify any revisions or updates of the plan agreed to by the Department.

#### [Removal Fill Condition 3]

#### GEN-RF-03

Prior to construction of a phase or segment of the facility and during operation, the certificate holder shall maintain compliance with the General and Special Conditions set forth in the removal-fill permit (Attachment J-3 to the Final Order on the ASC).

#### [Removal Fill Condition 5] The certificate holder shall: a. Prior to construction of a phase or segment of the facility, comply with procedures in all Removal-Fill Conditions, and receive an updated removal-fill permit (Attachment J-3 to the Final Order on the ASC) reviewed and approved by the Department in consultation with the Oregon Department of State Lands. b. Prior to construction of a phase or segment of the facility, submit a final copy of the updated removal-fill permit issued by the Oregon Department of State Lands. c. Following construction and during operation of a phase or segment of the facility, the certificate holder shall implement the actions described in the removal-fill permit. d. The Department will provide updates to Council on the certificate holder's implementation of the removal-fill permit and of any permit revisions at Council GEN-RF-04 meetings, following submittal of the certificate holder's six-month construction progress report per General Standard of Review Condition 3 or annual report per General Standard of Review Condition 4. e. The removal-fill permit version approved when the facility begins operation may be revised or updated from time to time by agreement of the certificate holder and the Oregon Energy Facility Siting Council ("Council"). Such revisions or updates may be made without amendment of the site certificate. The Council authorizes the Department to agree to revisions or updates to this permit. The Department shall notify the Council of all revisions or updates, and the Council retains the authority to approve, reject, or modify any revisions or updates of the permit agreed to by the Department. [Removal Fill Condition 6]] STANDARD: FISH PASSAGE [OAR 635-412-0035 a. Prior to construction, the certificate holder shall finalize, and submit to the Department for its approval in consultation with ODFW, a final Fish Passage Plan. As part of finalizing the Fish Passage Plan, the certificate holder shall request from ODFW any new information ODFW may have on the status of the streams within the site boundary and shall address the information in the final Fish Passage Plan. In addition, the certificate holder shall seek concurrence from ODFW on the fish-presence determinations for non-fish bearing streams within the Ladd Creek watershed, as presented in ASC Exhibit P1-7B Table 3. If the GEN-FP-01 certificate holder in consultation with ODFW, determines any of the previously

identified non-fish bearing streams within the Ladd Creek Watershed to be fish-bearing, the certificate holder shall complete a crossing risk evaluation and obtain concurrence from ODFW on applicability of fish passage requirements. If fish passage requirements apply, certificate holder shall seek approval from the Energy Facility Siting Council of a site certificate amendment to incorporate ODFW approval of new crossings and fish passage design/plans and conditions. The protective measures described in the draft Fish Passage Plan in Attachment

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- BB-2 to the Final Order on the ASC, shall be included as part of the final Fish Passage Plan, unless otherwise approved by the Department.
- The certificate holder shall maintain compliance with the measures outlined in the final Fish Passage Plan approved by the Department in consultation with ODFW.
- c. The certificate holder shall comply with the following operational provisions, as required per ODFW's fish passage approval (December 30, 2015), per Attachment BB-2 Appendix A of the Final Order on the ASC:
  - 1. All in water work shall occur during the ODFW in-water work windows for each waterbody.
  - 2. Temporary water management and fish rescue, salvage, and recovery, is required (as prescribed in OAR 635-412-0035(10)) prior to all in-water work activities (defined as all work at or below the ordinary high water elevation) associated with the project. Fish salvage activities require the certificate holder to obtain State of Oregon Scientific Take Permits from ODFW.
  - 3. Wildlife rescue, salvage, and recovery activities associated with the facility require the applicant to obtain State of Oregon Wildlife Rescue Salvage Permits from ODFW.
  - 4. Fish passage design standards, as defined in OAR 635-412-0035(1) and (3), shall be implemented for all fish passage components of these projects.
  - 5. The certificate holder shall be responsible for all maintenance required such that projects provide adequate passage for native migratory fish. If monitoring by the certificate holder or ODFW indicates that fish passage is not being provided, the certificate holder in consultation with ODFW, shall determine the cause and, during a work period approved by ODFW, shall modify the structure as appropriate to rectify problems as necessary. Failure to maintain fish passage for the duration of these approvals shall constitute a violation of these approvals and applicable fish passage laws (ORS 509.610).
  - 6. After construction completion, the certificate holder or its designee, shall maintain, monitor, evaluate and report on the effectiveness of fish passage as required under ORS 509.610, and shall provide written status reports to ODFW's Fish Passage Program annually for the first three (3) years and then a final report at Year 5, or as determined by ODFW. Reports shall include photographs from established photo-points as part of the fish-passage evaluation and monitoring. Monitoring, evaluation, and reporting shall be conducted annually unless problems are observed that may require additional analysis. Fish passage reports shall consist of visual observations, photographs, as-built plan reviews, and future site visits with regards to fish passage at and through the project sites. Reports shall be submitted to the State Fish Passage Coordinator and the La Grande and Malheur Watershed District Fish Biologists. Electronic or hard copy submissions are acceptable.
  - 7. Failure to maintain fish passage at these locations shall constitute a violation of these approvals and applicable fish passage laws (ORS 509.585 and 509.610).

- 8. ODFW shall be allowed to inspect the crossing sites at reasonable times for the duration of the approval. Unless prompted by emergency or other exigent circumstances, inspection shall be limited to regular and usual business hours, including weekends.
- 9. The appropriate ODFW District Fish Biologist shall be contacted 2-weeks in advance and prior to implementation of fish passage projects.
- 10. These fish passage approvals in no way authorize a take of a federally listed species.

[Fish Passage Condition 1]

#### **5.3 Pre-Construction Conditions**

	ORGANIZATIONAL EXPERTISE (OE) [OAR 345-022-0010]		
PRE-OE-01	Prior to construction, the certificate holder shall notify the Department of the		
	identity and qualifications of any construction managers, including the on-site		
	construction manager(s), to demonstrate that the construction manager is qualified		
	in managing facility construction and has the capability to ensure compliance with all		
	site certificate conditions.		
	[Organizational Expertise Condition 3]		
	Prior to construction, the certificate holder shall contractually require all		
	construction contractors and subcontractors involved in the construction of the		
	facility to comply with all applicable laws and regulations and with the terms and		
	conditions of the site certificate. The certificate holder shall provide to the		
	Department a copy of the executed contract terms requiring legal/site certificate		
PRE-OE-02	compliance. Copies of the relevant contract terms may redact business confidential		
	information. The contractors, on behalf of the certificate holder, may perform the		
	requirements set forth in these site certificate conditions. However, such		
	performance and such contractual provisions shall not relieve the site certificate		
	holder of responsibility under the site certificate.		
	[Organizational Expertise Condition 4]		
	Prior to construction, the certificate holder shall:		
	a. Submit to the Department and affected counties a list of third-party permits to		
	be obtained or that have been obtained by Umatilla Electric Co-Op, Pacific Powe		
DDE 05 03	and Oregon Trail Electric Cooperation for the communication station distribution		
PRE-OE-03	lines.		
	b. Submit to the Department copies of all obtained third party permits, as identified		
	in (a) of this condition.		
	[Organizational Expertise Condition 7]		
STANDARD: S	TRUCTURAL STANDARD (SS) [OAR 345-022-0020]		
	At least 90 days prior to construction of a phase or segment of the facility:		
	a. The certificate holder shall submit an investigation plan, prepared by a		
	professional engineer or geologist licensed in Oregon, for the pre-construction		
	site-specific geologic and geotechnical investigation to the Department for		
	review in consultation with DOGAMI. The investigation plan shall specify the		
	investigation methods to be used to evaluate site-specific seismic and non-		
PRE-SS-01	seismic hazards identified in (b) of this condition and should, at a minimum, be		
	consistent with the Oregon State Board of Geologist Examiners Guideline for		
	Preparing Engineering Geologic Reports and include methods for literature		
	review, geotechnical field exploration program, laboratory testing, mapping and		
	detailed site reconnaissance.		
	b. The certificate holder shall submit to the Department and DOGAMI a pre-		
	construction site-specific geological and geotechnical investigation report		
	construction site-specific geological and geotechnical investigation report		

(report), prepared by a professional engineer or geologist licensed in Oregon, for review, demonstrating that the facility site has been adequately characterized and the facility and temporary construction activities, such as blasting, have been designed and located to avoid seismic, soil and geologic hazards.

- i. The report shall at a minimum include information derived from the geological and geotechnical investigations regarding:
  - 1. Subsurface soil and geologic conditions within the site boundary;
  - Site-specific geotechnical design criteria and data for the facility components informed by a Probabilistic Seismic Hazard Assessment and based on, at a minimum, identified fault sources, ground motion, site class for ground motion, and response spectra;
  - 3. Potentially active faults that may affect the facility and their potential risk to the facility;
  - 4. Potential slope instability and landslide hazards based on boring locations spaced approximately 1 mile along the alignment at dead-end structures; any corners or changes in alignment heading (angles); crossings of highways, major roads, rivers, railroads, and utilities as power transmission lines, natural gas pipelines, and canals; locations where blasting may occur; and, locations necessary to verify lithologic changes and/or geologic hazards such as landslides, steep slopes, or soft soil area.
  - Potential liquefaction hazards;
  - 6. Potential soil expansion hazards;
  - 7. Groundwater detections and any related potential risk to the facility;
  - 8. Corrosive soils detections and any related potential risk to the facility; and
  - Facility components within the 100-year flood zone and any related potential risk to the facility
  - 10. Define and delineate geological and geotechnical hazards to the facility, and identify means to mitigate the identified hazards.
  - 11. The report shall identify the applicable codes (i.e. Oregon Building Code, Oregon Structural Specialty Code), including name and reference number, that the facility components will be designed to satisfy.
- ii. In the electronic (email) submission of the report to the Department, as required under (b) of this condition, the certificate holder shall identify whether blasting is recommended. For any recommended blasting locations, in table and map format, specify the transmission line structure number, milepost and county; and, either submit with the report the draft Framework Blasting Plan (Soil Protection Condition 4, Attachment G-5 of this order), following the pre-construction agency review process or provide the schedule for initiation of the established agency review process, as provided in the draft Blasting Framework Plan.

[Structural Standard Condition 1]

#### STANDARD: LAND USE (LU) [OAR 345-022-0030]

PRE-LU-01 Prior to construction of any phase or segment of facility components in Umatilla

	County, the certificate holder shall work with the Public Works Department on building standards for the road improvements and construction, and for any roads constructed in forest lands in Umatilla County, the certificate holder will ensure road construction is consistent with the Oregon Forest Practices Act.  [Land Use Condition 4]	
PRE-LU-02	Prior to construction of any phase or segment of the facility in Baker County, the certificate holder shall provide to the Baker County Planning Department a list of the suppliers that will be supplying the aggregate used in construction in Baker County along with a copy of the suppliers' land use permits.  [Land Use Condition 8]	

#### STANDARD: RETIREMENT AND FINANCIAL ASSURANCE (RT) [OAR 345-022-0050]

Retirement and Financial Assurance Condition 4: Consistent with Mandatory Condition OAR 345-025-0006(8), before beginning construction of the facility, the certificate holder shall submit to the State of Oregon, through the Council, a bond or letter of credit naming the State of Oregon, acting by and through the Council, as beneficiary or payee. During the construction phase (defined as the period of time from the beginning of construction as defined in ORS 469.300(6) to the date when the facility is placed in service), the certificate holder shall adjust the amount of the bond or letter of credit on a quarterly basis, as follows:

a. The amount of the bond or letter of credit will be increased on a quarterly basis to correspond with the progress of the construction of the facility at the beginning of each quarter. The amount of the bond or letter of credit at the beginning of any such quarterly period will be equal to the product of (i) the estimated total decommissioning cost for the facility, adjusted for inflation, as specified in section (c) of this condition; and (ii) a fraction, the numerator of which is the number of quarters that have passed since commencement of construction, and the denominator of which will be the number of quarters during which the certificate holder must complete the construction phase; provided that in all cases the number resulting from the calculation shall not exceed 1.0.

PRE-RT-01

- b. The certificate holder and the Department shall assume a four-year construction phase comprising sixteen quarterly periods. Therefore, for the first quarter of the construction phase, the bond or letter of credit will be maintained in an amount equal to one-sixteenth (1/16) of the total estimated decommissioning cost specified in section (c) of this condition. At the end of the first year of construction—i.e., four quarters—the amount of the bond or letter of credit will be equal to four-sixteenths (4/16) of the total estimated decommissioning costs.
- c. The estimated total decommissioning cost for the facility is \$140,779,000 (3rd Quarter 2016 dollars), to be adjusted to the date of issuance of the bond or letter of credit, and on a quarterly basis thereafter during the construction phase. For the purposes of calculating the bond or letter of credit amount required by section (a) of this condition, the certificate holder shall adjust the estimated total decommissioning cost using the following calculation:

- ii. Adjust the estimated decommissioning cost to correspond with the progress of the construction of the facility at the beginning of each quarter, based on the unit costs and assumptions identified in the Final Order on the ASC, Attachment W-1.
- iii. Adjust the estimated total decommissioning cost (expressed in Q3 2016 dollars) to present value, using the U.S. Gross Domestic Product Implicit Price Deflator, Chain-Weight, as published in the Oregon Department of Administrative Services' "Oregon Economic and Revenue Forecast" or by any successor agency and using the third quarter 2016 index value and the quarterly index value for the date of issuance of the new bond or letter of credit. If at any time the index is no longer published, the Council shall select a comparable calculation to adjust third quarter 2016 dollars to present value.
- Round the result total to the nearest \$1,000 to determine the inflationadjusted estimated total decommissioning cost.
- d. The certificate holder shall use an issuer of the bond or letter of credit approved by the Council.
- e. The certificate holder shall use a form of bond or letter of credit approved by the Council. The certificate holder shall describe the status of the bond or letter of credit in the annual report submitted to the Council under OAR 345-026-0080(1)(b). The bond or letter of credit shall not be subject to revocation or reduction before the facility has been placed in service, at which time the certificate holder must provide the bond or letter of credit specified in Retirement and Financial Assurance Condition 5.
- f. The amount of the bond or letter of credit may be amended from time to time by agreement of the certificate holder and the Department to account for adjustments in the construction schedule. Subject to Department approval, the certificate holder may request an adjustment of the bond or letter of credit amount based on final design configuration of the facility by applying the unit costs and assumptions presented in the Final Order on the ASC, Attachment W-1. Such adjustments may be made without amendment to the site certificate. The Council authorizes the Department to agree to these adjustments in accordance with this condition.

[Retirement and Financial Assurance Condition 4]

#### STANDARD: FISH AND WILDLIFE HABITAT (FW) [OAR 345-022-0060]

PRE-FW-01

Prior to construction of a phase or segment of the facility, the certificate holder shall conduct, as applicable, the following biological surveys on those portions of the site boundary that have not been surveyed at the time of issuance of the site certificate, based on the survey protocols included in ASC Exhibit P Attachment P1-2 Revised Final Biological Survey Work Plan, unless otherwise approved by the Department in consultation with ODFW:

- a. Northern Goshawk;
- b. American Three-Toed Woodpecker;
- c. Great Gray Owl;
- d. Flammulated Owl;

Terrestrial Visual Encounter Surveys; f. Wetlands; and g. Fish Presence and Crossing Assessment Surveys. [Fish and Wildlife Condition 15] Prior to construction of a phase or segment of the facility, the certificate holder shall conduct, as applicable, the following biological surveys on all portions of the site boundary, regardless of whether those portions have been surveyed at the time of issuance of the site certificate, based on the survey protocols included in ASC Exhibit P Attachment P1-2 Revised Final Biological Survey Work Plan, unless otherwise approved by the Department in consultation with ODFW: a. Washington ground squirrels; PRE-FW-02 b. Raptor nests; c. Pygmy rabbits; d. State-listed Threatened and Endangered plants e. Greater sage-grouse, as necessary for the State of Oregon to calculate the amount of sage-grouse habitat compensatory mitigation required for the facility using Oregon's Sage-Grouse Habitat Quantification Tool. [Fish and Wildlife Condition 16] At least 90 days prior to construction of a facility phase or component in sage-grouse habitat as mapped by The Oregon Department of Fish and Wildlife (ODFW) at that time, unless otherwise agreed to by the Department, the certificate holder shall finalize, and submit to the Department for its approval, in consultation with ODFW, a final Sage-Grouse Habitat Mitigation Plan for the phase or segment to be constructed. a. The certificate holder shall provide to the Department the information necessary for the State of Oregon to calculate the amount of sage-grouse habitat compensatory mitigation required for the facility using Oregon's Sage-Grouse Habitat Quantification Tool (HQT). b. The final Sage-Grouse Habitat Mitigation Plan shall address the potential sagegrouse habitat impacts through mitigation banking, an in-lieu fee program, development of mitigation projects by the certificate holder, or a combination of PRE-FW-03 the same. i. To the extent the certificate holder develops its own mitigation projects, the final Sage-Grouse Habitat Mitigation Plan shall: 1. Identify the location of each mitigation site, including a map of the same; 2. Identify the number of credit-acres that each mitigation site will provide for the certificate holder, including results of the HQT results for the site and mitigation actions; 3. Include a site-specific mitigation management plan for each mitigation site that provides for: A. A baseline ecological assessment; B. Conservation actions to be implemented at the site; C. An implementation schedule for the baseline ecological assessment

- and conservation actions;
- D. Performance measures and success criteria for mitigation actions;
- E. Adaptive management considerations for changes in habitat conditions or a results of catastrophic fire;
- F. Weed management plan;
- G. A reporting plan;
- H. A monitoring plan; and;
- I. A description of how the durability of the mitigation site will be achieved, including but not limited to, any long-term stewardship plans and financial assurances.
- ii. To the extent the site certificate utilizes a mitigation bank or in-lieu fee program, the final Sage-Grouse Habitat Mitigation Plan shall:
  - 1. Describe the nature, extent, and history of the mitigation bank or inlieu fee program;
  - 2. Identify the number of credit-acres that each mitigation site will provide for the certificate holder, and;
  - 3. Demonstrate that ODFW has approved the program to fulfill sage-grouse habitat mitigation requirements.
- iii. The final Sage-Grouse Habitat Mitigation Plan shall include compensatory mitigation sufficient to address impacts from, at a minimum, all facility components except indirect impacts from existing access roads substantially modified for the facility (related or supporting facilities). For calculation purposes, new facility roads with access control will be assigned a "no-traffic" designation, and new roads without access control will be assigned a "low-traffic" designation. As referenced in Fish and Wildlife Condition 19, the certificate holder shall demonstrate during or about the third year of operation that sage-grouse habitat mitigation shall be commensurate with the final compensatory mitigation calculations, either by showing the already-implemented mitigation is sufficient to cover all facility component impacts, or by proposing additional mitigation to address any impacts incremental to the initial calculation. The final compensatory mitigation calculations must be based on the asconstructed facility as well as the pre- and post- construction traffic studies, and must include the addition of indirect impacts from substantially modified existing access roads.
- c. Oregon's Sage-Grouse Habitat Quantification Tool shall be used to calculate the amount of sage-grouse habitat compensatory mitigation required for the facility and the number of credit-acres that each mitigation site will provide for the certificate holder.
- d. Prior to construction of a phase or segment in sage-grouse habitat as mapped by the Oregon Department of Fish and Wildlife (ODFW) at that time and based on final facility design, Oregon's Sage-Grouse Development Registry shall be used to calculate and verify compliance with the metering and disturbance thresholds established at OAR 660-023-0115(16) and (17). Evidence of compliance must be

provided to the Department prior to construction.

e. The Sage-Grouse Habitat Mitigation Plan may be amended from time to time by agreement of the certificate holder and the department. Such amendments may be made without amendment to the site certificate. The Council authorizes the Department to agree to amendments of the plan and to mitigation actions that may be required under the plan; however, the Council retains the authority to approve, reject, or modify any amendment of the plan agreed to by the Department.

[Fish and Wildlife Condition 17]

#### PRE-FW-04

Prior to construction of a phase or segment of the facility, the certificate holder shall conduct a one-year traffic study in elk habitat (elk summer range and elk winter range, based on the most recent ODFW maps available at the time) and sage-grouse habitat (areas of high population richness, core area habitat, low density habitat, and general habitat, based on most recent ODFW maps available at the time). The certificate holder shall submit the traffic study to the Department for its review and approval in consultation with ODFW.

[Fish and Wildlife Condition 21]

#### STANDARD: PUBLIC SERVICES (PS) [OAR 345-022-0110]

#### DELIC SERVICES (1 5) [OAR 545 CEE CITO]

#### PRE-PS-01

Prior to construction within Malheur County,

- a. The certificate holder shall consult with the Owyhee Irrigation District on the segment between Milepost 255 and 258. Consultation shall present results of the geotechnical studies within this segment area, evaluate structure interference with irrigation structures, and confirm adequate clearance to minimize impacts to irrigation canal structures.
- b. The certificate holder shall develop mitigation for any agreed upon impacts from construction and operation of the facility to the South Canal of the Owyhee Project and any other impacted irrigation pipelines or equipment as determined appropriate by the certificate holder and Owyhee Irrigation District. A copy of any finalized agreement shall be submitted to the Department.

[Public Services Condition 1]

At least 90 days prior to construction of a facility phase or segment in each affected county and jurisdiction, unless otherwise approved by the Department, the certificate holder shall complete the following to address traffic impacts and transportation coordination in each county and jurisdiction:

#### PRE-PS-02

a. The certificate holder shall, in accordance with the OAR 345-026-0016 agency consultation process outlined in the draft Transportation and Traffic Plan (Attachment U-2 of the Final Order on the ASC) submit to the Department for review and approval, a final county-specific Transportation and Traffic Plan associated with the phase or segment of the facility to be constructed. The protective measures described in the draft Transportation and Traffic Plan, Attachment U-2 to the Final Order on the ASC, shall be included and implemented as part of the final county-specific Plan, unless otherwise approved by the Department, in consultation with the county or jurisdiction;

- b. The final county-specific Transportation and Traffic Plan submitted to the Department, county, and jurisdiction shall include:
  - The identification of the final material/equipment transportation, access, and haul routes and documentation of the existing condition of the routes/roads;
  - ii. Attachment B-5 Road Classification Guide and Access Control Plan attached to the Final Order on the ASC updated to reflect the final design of the facility. Include applicable road segment maps with road names for existing public roads, road names in Appendix A: Access Road Segment Attribute Table, road improvements designations, and final access control device description and locations;
    - 1. If, at final facility design, substantial modification of existing roads not identified as related or supporting facilities in Attachment B-5 (maps) of the Final Order on the ASC is necessary, the certificate holder must submit an Amendment Determination Request (OAR 345-027-0357), or submit a site certificate amendment request to the Department, prior to the modification to determine whether the road modifications are related or supporting facilities. Substantial modification of existing roads shall be as defined in Attachment B-5, which includes repairs to more than 20 percent of road surface, defined by the road prism width and longitudinal distance over a defined road segment.
  - iii. List any road use permits, encroachment permits, oversize/overweight permits, or road use or other legal agreements obtained by the construction contractor or applicant.
- c. The final Transportation and Traffic Plan for a phase or segment of the facility must be approved by the Department, in consultation with each county or jurisdiction, prior to construction.
- d. Prior to construction or road modification in any area designated as a geologic hazard zone by Oregon Department of Geology and Mineral Industries (DOGAMI) data and maps (e.g., as landslide or debris flow fan), or by relevant local zoning ordinances and maps, the site certificate holder and/or its construction contractors will consult with a licensed civil engineer to assess the proposed construction or road design in relation to potential geologic hazards.

#### [Public Services Condition 2]

#### PRE-PS-03

Prior to construction of any phase or segment of the facility, the certificate holder shall submit to the Federal Aviation Administration (FAA) and the Oregon Department of Aviation (ODA) a FAA Form 7460-1 Notice of Proposed Construction or Alteration for transmission structures within 5-miles of a public airport (La Grande /Union County Airport and Baker City Airport) and cranes exceeding 200 feet in height. The certificate holder shall submit to the Department a copy of the FAA and ODA hazard determination.

#### [Public Services Condition 4] At least 90 days prior to construction of a facility phase or segment, the certificate holder shall submit to the Department a proposed Environmental and Safety Training Plan, for review and approval by the Department, in consultation with each county and the medical response entities identified in the plan. The plan must include at a minimum, the following elements: Measures for securing multi-use areas and work sites when not in use; b. Drug/alcohol/firearm policies with clear consequences for violations; and c. An emergency and medical response plan including: i) Contact information for federal, state, and county emergency management PRE-PS-04 services: ii) Emergency response procedures for helicopter emergency response, spill reporting, hospitals closest to the transmission line route, and any other emergency response procedures; iii) Landing locations for medical emergency life-flights. d. Requirements for training workers on the contents of the plan. e. The certificate holder shall maintain copies of the Environmental and Safety Training Plan onsite and conduct all work in compliance with the plan during construction and operation of the facility. [Public Services Condition 5] STANDARD: SITING STANDARDS FOR TRANSMISSION LINES (TL) [DIVISION 24] Prior to construction, the certificate holder shall schedule a time to brief the Public Utility Commission Safety, Reliability, and Security Division (Safety) Staff as to how it will comply with OAR Chapter 860, Division 024 during design, construction, PRE-TL-01 operations, and maintenance of the facilities. The certificate holder shall notify the Department how and when it briefed the Public Utility Commission staff. [Siting Standards for Transmission Lines Condition 4] STANDARD: REMOVAL FILL LAW (RF) [OAR 141-085-0500 through -0785] The certificate holder shall: a. Prior to construction of a phase or segment of the facility, submit updated electronic wetland delineation report(s) to the Department and to the Oregon Department of State Lands. All wetland delineation report(s) submitted to the Oregon Department of State Lands shall follow its submission and review PRE-RF-01 procedures. b. Prior to construction of a phase or segment of the facility, the Department must receive a Letter of Concurrence issued by the Oregon Department of State Lands referencing the applicable wetland delineation for the phase or segment of the facility. [Removal Fill Condition 1] Prior to construction of a phase or segment of the facility, the certificate holder shall provide an electronic copy of the updated Joint Permit Application (JPA) to the PRE-RF-02 Department. [Removal Fill Condition 4]

#### **5.4 Constructions Conditions**

Condition Number	(Site certificate conditions for all standards and phases)		
STANDARD: G	STANDARD: GENERAL STANDARD OF REVIEW (GS) [OAR 345-022-0000]		
CON-GS-01	Within six months after the Construction Commencement Deadline in General Standard of Review Condition 1, and every six months thereafter during construction of the facility and related or supporting facilities, the certificate holder shall submit a semiannual construction progress report to the Department consistent with OAR 345-026-0080(1)(a). To the extent that information required by this rule is contained in reports the certificate holder submits to other state, federal or local agencies, the certificate holder may submit excerpts from such other reports to satisfy this rule, unless otherwise required by a site certificate condition.  [General Standard of Review Condition 3]		
CON-GS-02	The certificate holder may begin construction, as defined in OAR 345-001-0010(12), or create a clearing on a part of the site if the certificate holder has construction rights on that part of the site and the certificate holder would construct and operate part of the facility on that part of the site even if a change in the planned route of transmission line occurs during the certificate holder's negotiations to acquire construction rights on another part of the site.  [General Standard of Review Condition 7; Mandatory Condition OAR 345-025-0006(5)]		
STANDARD: LA	AND USE (LU) [OAR 345-022-0030]		
CON-LU-01	During construction in Baker County, the certificate holder shall construct the facility to comply with the following setback distances and other requirements: In the EFU Zone (Based solely on certificate holder representations in the ASC):  a. Buildings shall be setback as follows: front yards shall be set back at least 20 feet from property lines and road rights-of-way.  b. Buildings and the fixed bases of transmission line towers shall be set back at least 60 feet from the center line of a road or street or 30 feet from any right- of-way in excess of 60 feet.  c. Buildings and the fixed bases of transmission line towers shall be set back at least 10 feet from property lines.  d. Buildings and the fixed bases of the transmission line towers shall be set back at least 50 feet from the high-water mark of naturally-occurring riparian area, bog, marsh, or waterway.  [Land Use Condition 10]		
CON-LU-02	Within 90-days of construction within Union County, if the Morgan Lake alternative route segment is selected at final facility design, the certificate holder shall provide the Department a copy of the Memorandum of Agreement, if executed, between the City of La Grande and certificate holder for improvements at Morgan Lake Park.		

	[Land Use Condition 17]		
STANDARD: F	ISH AND WILDLIFE HABITAT (FW) [OAR 345-022-0060]		
CON-FW-01	During construction, the certificate holder shall not conduct ground-disturbing activities within elk or mule deer winter range between December 1 to March 31.  Upon request by the certificate holder, the Department in consultation with ODFW may provide exceptions to this restriction. The certificate holder's request must include a justification for the request, including any actions the certificate holder will take to avoid, minimize, or mitigate impacts to elk and mule deer in the relevant area.  [Fish and Wildlife Condition 11]		
CON-FW-02	During construction, if active pygmy rabbit colonies or the roost of a State Sensitive bat species is observed during the biological surveys set forth in Fish and Wildlife Conditions 15 and 16, the certificate holder shall submit to the Department for its approval a notification addressing the following:  a. Identification of the State Sensitive bat species observed;  b. Location of pygmy rabbit colony or bat roost; and  c. Any actions the certificate holder will take to avoid, minimize, or mitigate impacts to pygmy rabbit colony or bat roost.  d. The Department in consultation with the Oregon Department of Fish and Wildlife (ODFW) will review and approve the proposed avoidance, minimization or mitigation measures prior to the action by the certificate holder to impact State Sensitive bat species roosts or hibernacula.  [Fish and Wildlife Condition 12]		
CON-FW-03	During construction, if the certificate holder will be conducting ground-disturbing activities during the migratory bird nesting season between April 1 and July 15, the certificate holder shall conduct, as applicable, biological surveys for native, non-raptor bird species nests on all portions of the site boundary a maximum of 7 days prior to ground-disturbing activities, regardless of whether those portions have been previously surveyed. If		

During construction, the certificate holder shall not conduct ground-disturbing activities within the following timeframes and spatial buffers surrounding occupied nests of certain raptor species. Upon request by the certificate holder, the Department in consultation with ODFW may provide exceptions to this restriction. The certificate holder's request must include a justification for the request, including any actions the certificate holder will take to avoid, minimize, or mitigate impacts to the raptor and its nest.

CON-FW-04

Raptor Nest Buffers		
	Spatial Buffers	
Nesting	(radius around nest	Temporal
Species	site):	Restrictions
Bald eagle	0.5 mile	January 1 to August 15
Golden eagle	0.5 mile	February 1 to August 15
Ferruginous hawk	0.50 mile	March 15 to August 15
Flammulated owl	0.25 mile	March 1 to August 15
Great gray owl	0.25 mile	March 1 to August 15
Northern goshawk	0.5 mile	May 1 to August 15
Peregrine falcon	0.25 mile	January 1 to July 1
Prairie falcon	0.25 mile	March 15 to July 1
Red-tailed hawk	300 to 500 feet	March 1 to August 15
Swainson's hawk	0.25 mile	April 1 to August 15
Western burrowing owl	0.25 mile	April 1 to August 15

[Fish and Wildlife Condition 14]

#### CON-FW-05

During construction of a facility phase or component in sage-grouse habitat as mapped by the Oregon Department of Fish and Wildlife (ODFW) at that time, the certificate holder shall implement the conservation actions set forth in the final Sage-Grouse Habitat Mitigation Plan referenced in Fish and Wildlife Condition 17 within six months of the impact actions.

#### [Fish and Wildlife Condition 18]

#### CON-FW-06

During construction, the certificate holder shall not conduct ground-disturbing activities within sage-grouse areas of high population richness, core area habitat, low density habitat, or general habitat between March 1 to June 30. Upon request by the certificate holder, the Department in consultation with ODFW may provide exceptions to this restriction. The certificate holder's request must include a justification for the exception, including any actions the certificate holder will take to avoid, minimize, or mitigate impacts to sage-grouse in the relevant area. [Fish and Wildlife Condition 20]

#### STANDARD: THREATENED AND ENDANGERED SPECIES (TE) [OAR 345-022-0070]

#### CON-TE-01

During construction, the certificate holder shall not conduct ground-disturbing activities within Category 1 Washington ground squirrel (WAGS) habitat, subject to the following:

The identification and categorization of WAGS habitat shall be based on the

- surveys referenced in Fish and Wildlife Condition 16 and the results of the surveys shall apply for up to three years.
- b. The certificate holder may span Category 1 WAGS habitat and may work within Category 1 WAGS habitat, provided such work does not cause any ground disturbance.
- c. The results of the surveys completed per Fish and Wildlife Condition 16 shall remain valid for 3 years. If, during construction and within three years of the protocol survey, an occupied WAGS colony is encountered, the habitat category identified during the protocol survey shall remain valid (i.e. habitat not considered Category 1); the certificate holder shall submit to the Department for its approval, in consultation with ODFW, a notification addressing the following:
  - Location of the burrow or colony; and
  - ii. Any actions the certificate holder will take to avoid, minimize, or mitigate impacts to the colony.

#### [Threatened and Endangered Species Condition 1]

During construction, the certificate holder shall not conduct ground-disturbing activities within a 33-foot buffer around threatened or endangered plant species, based on pre-construction field surveys required per site certificate condition Fish and Wildlife Habitat 16, subject to the following:

#### CON-TE-02

- a. If complete avoidance is not possible (for example, if the threatened or endangered plant species is located within 33 feet of an existing road where upgrades are authorized), the certificate holder shall install temporary construction mats over soils where the threatened or endangered plant species have been observed and where construction vehicles will be operated; and
- b. If herbicides are used to control weeds, the certificate holder shall follow agency guidelines including guidelines recommended by the herbicide manufacturer, in establishing buffer areas around confirmed populations of threatened or endangered plant species and refrain from using herbicides within those buffers.

[Threatened and Endangered Species Condition 2]

#### STANDARD: NOISE CONTROL REGULATIONS (NC) [OAR 340-035-0035]

## During construction, the certificate holder shall implement the following design measures and construction techniques to minimize potential corona noise during operations:

#### CON-NC-01

- a. For 500 kV transmission lines, use a triple bundled conductor configuration.
- Maintain tension on all insulator assemblies to ensure positive contact between insulators.
- c. Protect conductor surface to minimize scratching or nicking.

[Noise Control Condition 3]

#### 5.5 Operational Conditions

Condition Number	(Site certificate conditions for all standards and phases)
STANDARD: G	ENERAL STANDARD OF REVIEW (GS) [OAR 345-022-0000]
OPR-GS-01	After January 1 but no later than April 30 of each year after beginning operation of the facility, unless otherwise agreed upon by the certificate holder and the Council Secretary, the certificate holder shall submit an annual report to the Department addressing the subjects listed in OAR 345-026-0080(1)(b). To the extent that information required by this rule is contained in reports the certificate holder submits to other state, federal or local agencies, the certificate holder may submit excerpts from such other reports to satisfy this rule, unless otherwise required by a site certificate condition.  [General Standard of Review Condition 4]
OPR-GS-02	The certificate holder shall submit a legal description of the site to the Department, Malheur County Planning Department, Baker County Planning Department, Union County Planning Department, Umatilla County Planning Department, and Morrow County Planning Department within 90 days after beginning operation of the facility. The legal description required by this rule means a description of metes and bounds or a description of the site by reference to a map and geographic data that clearly and specifically identify the outer boundaries that contain all parts of the facility. [General Standard of Review Condition 5; Mandatory Condition OAR 345-025-0006(2)]
OPR-GS-03	Upon completion of construction, the certificate holder shall restore vegetation to the extent practicable and shall landscape all areas disturbed by construction in a manner compatible with the surroundings and proposed use. Upon completion of construction, the certificate holder shall remove all temporary structures not required for facility operation and dispose of all timber, brush, refuse and flammable or combustible material resulting from clearing of land and construction of the facility. In the annual report, the certificate holder shall report to the Department restoration activities, and applicable sections of the Reclamation and Revegetation Plan provided as Attachment P1-3 of the Final Order on the ASC, by county and area of temporary disturbance (i.e. multi-use areas, light duty fly yards, pulling and tensioning sites).  [General Standard of Review Condition 9; Mandatory Condition OAR 345-025-0006(11)]
STANDARD: O	RGANIZATIONAL EXPERTISE (OE) [OAR 345-022-0010]
OPR-OE-01	During operations, the certificate holder shall provide documentation of inspection, including date inspection(s) occurred, issues identified, and any corrective actions taken, within the annual report submitted to the Department pursuant to OAR 345-026-0080(1)(b), for the following:

- a. Transmission line(s): Routine line patrols/inspections, unscheduled emergency line patrols, aerial vegetation patrols, and comprehensive 10-year maintenance inspection conducted in accordance with its Transmission Maintenance and Inspection Plan and Transmission Vegetation Management Program.
- b. Longhorn Station: Monthly inspections including visual inspections of buildings, fencing, and electrical equipment; monitoring of all protective relays, gauges, counters, meters, and communication devices; and, annual infrared assessment of bus and operating equipment carrying capacity in accordance with the Station Maintenance Program.

[Organizational Expertise Condition 1]

#### STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]

OPR-SP-01

During operation, the certificate holder shall inspect the facility components for soil impacts as part of the certificate holder's regular transmission line inspection process and shall implement corrective action and mitigation measures, if necessary.

[Soil Protection Condition 5]

#### STANDARD: RETIREMENT AND FINANCIAL ASSURANCE (RT) [OAR 345-022-0050]

Consistent with Mandatory Condition OAR 345-025-0006(8), no later than the date the facility is placed in service (the In-Service Date), the certificate holder shall submit to the State of Oregon, through the Council, a bond or letter of credit naming the State of Oregon, acting by and through the Council, as beneficiary or payee. The certificate holder shall maintain a bond or letter of credit as follows:

- a. Notwithstanding subsections (b) (g) of this condition, the Council retains the authority to require the certificate holder to submit a bond or letter of credit, in a timeframe identified by Council, and in an amount equal to the estimated total decommissioning cost for the facility (\$140,779,000 in 3<sup>rd</sup> Quarter 2016 dollars adjusted to present day value), or another amount deemed by the Council to be satisfactory to decommission the facility and restore the site to a useful, nonhazardous condition.
- OPR-RT-01 cree
- From the In-Service Date until In-Service Year 51, the amount of bond or letter of credit shall be \$1.00.
  - c. On the 50<sup>th</sup> anniversary of the In-Service Date, the certificate holder shall begin maintaining a bond or letter of credit in an amount that will increase on an annual basis for the next 50 years. In year 51, the amount of the bond or letter of credit will be set at one-fiftieth (1/50) of the total estimated decommissioning costs, adjusted for inflation, as specified in section (e) of this condition. Each year, through the 100<sup>th</sup> year of service, the bond or letter of credit shall be increased by one-fiftieth (1/50) of the estimated decommissioning costs. Once the bond or letter of credit is in an amount equal to 100 percent of decommissioning costs, it will remain at that level for the life of the facility.
  - d. On the fifth anniversary of the In-Service Date, and on each subsequent quinquennial thereafter, or any year if requested by Council, the certificate holder shall notify the Department 60 days prior and report to the Council in writing or in-person on the following subjects for the prior 5-year reporting

period: (i) the physical condition of the facility; (ii) any evolving transmission or electrical technologies that could impact the continued viability of the facility; (iii) the facility's performance in the context of the larger power grid; and (iv) the certificate holder's general financial condition, including the certificate holder's credit rating and current financial statements for that 5-year reporting period. The Department shall review the 5-year report and may engage its consultant in the review of the 5-year report. The Department may also include other information in its evaluation of the 5 year-report, including but not limited to: expertise of other reviewing agencies and internal Department staff, consultation with industry experts, or other consulting parties. The certificate holder shall be responsible for all costs associated with review of the 5-year report, in accordance with applicable rules and statutes. Based on the information provided in the 5-year report, and the Department's review and recommendations, the Council will consider whether the certificate holder should be required to post a bond or letter of credit that varies from the financial assurance requirements set forth in sections (b) and (c) of this condition. The certificate holder shall be subject to Council's determination. The Council's determination may include extending the date on which the certificate holder would be required to begin posting the financial assurances set forth in section (c) of this condition.

- e. The estimated total decommissioning cost for the facility is \$140,779,000 (3<sup>rd</sup> Quarter 2016 dollars), to be adjusted to the date of issuance of the bond or letter of credit in In-Service Year 51, and on an annual basis thereafter. Subject to Department approval, the certificate holder may request an adjustment of the bond or letter of credit amount based on final design configuration of the facility by applying the unit costs and assumptions presented in the Final Order on the ASC, Attachment W-1. Such adjustments may be made without amendment to the site certificate. The Council authorizes the Department to agree to these adjustments in accordance with this condition. The certificate holder shall adjust the decommissioning cost for inflation using the following calculation:
  - i. Adjust the estimated total decommissioning cost (expressed in Q3 2016 dollars) to present value, using the U.S. Gross Domestic Product Implicit Price Deflator, Chain-Weight, as published in the Oregon Department of Administrative Services' "Oregon Economic and Revenue Forecast" or by any successor agency and using the third quarter 2016 index value and the quarterly index value for the date of issuance of the new bond or letter of credit. If at any time the index is no longer published, the Council shall select a comparable calculation to adjust third quarter 2016 dollars to present value.
  - ii. Round the result total to the nearest \$1,000 to determine the inflationadjusted estimated total decommissioning cost.
- f. The certificate holder shall use an issuer of the bond or letter of credit approved by the Council.

g. The certificate holder shall use a form of bond or letter of credit approved by the Council. The certificate holder shall describe the status of the bond or letter of credit in the annual report submitted to the Council under OAR 345-026-0080(1)(b). The certificate holder shall maintain a bond or letter of credit in effect at all times as described in this condition and Retirement and Financial Assurance Condition 4 until the facility has been retired.

[Retirement and Financial Assurance Condition 5]

#### STANDARD: FISH AND WILDLIFE HABITAT (FW) [OAR 345-022-0060]

During the third year of operation, the certificate holder shall provide to the Department a report demonstrating that fish and wildlife habitat mitigation is commensurate with the final compensatory mitigation calculations.

#### OPR-FW-01

- a. The final calculations shall be based on the as-constructed facility.
- b. Oregon's Elk Mitigation Framework shall be used to calculate the amount of elk habitat compensatory mitigation required for the facility, and the information from the pre- and post-construction traffic studies, as required by Fish and Wildlife Conditions 21 and 22, shall be used in the calculation.

#### [Fish and Wildlife Condition 5]

#### OPR-FW-02

During operation, the certificate holder shall employ access control on facility access roads within elk habitat (elk summer range and elk winter range) and sage-grouse habitat (areas of high population richness, core area habitat, low density habitat, or general habitat), subject to approval by the applicable land-management agency or landowner.

[Fish and Wildlife Condition 9]

During the third year of operation, the certificate holder shall provide to the Department and ODFW the data from the traffic studies in Fish and Wildlife Conditions 21 and 22 for ODFW to calculate the final amount of indirect impact from facility roads that are considered related or supporting facilities to sage-grouse habitat and corresponding compensatory mitigation required using Oregon's Sage-Grouse Habitat Quantification Tool. After receiving the calculations from the State, the certificate holder shall provide to the Department a report demonstrating that sage-grouse habitat mitigation shall be commensurate with the final compensatory mitigation calculations.

#### OPR-FW-03

- a. The final calculations shall be based on the as-constructed facility.
- b. Oregon's Sage-Grouse Habitat Quantification Tool shall be used to calculate the amount of sage-grouse habitat compensatory mitigation required for the facility, and the information from the pre- and post-construction traffic studies shall be used in the calculation.

#### [Fish and Wildlife Condition 19]

#### OPR-FW-04

During the second year of facility operation, the certificate holder shall conduct a one-year traffic study in elk habitat (elk summer range and elk winter range, based on the same maps used for the pre-construction traffic study) and sage-grouse habitat (areas of high population richness, core area habitat, low density habitat, general habitat, based on the same maps used for the pre-construction traffic study).

[Fish and Wildlife Condition 22]

#### STANDARD: HISTORIC, CULTURAL, AND ARCHEOLOGICAL RESOURCES (HC) [OAR 345-022-0090]

Within three year after construction is completed, the certificate holder shall finalize, and submit to the Department for its approval, a final Cultural Resources Technical Report.

#### OPS-HC-01

- The results of all cultural resource monitoring required by the Historic Properties Management Plan (HPMP) referenced in Historic, Cultural, and Archaeological Resources Condition 2; and
- b. The results of all cultural resources testing or data recovery conducted as a result of unanticipated discoveries as required by the Inadvertent Discovery Plan in the Historic Properties Management Plan referenced in Historic, Cultural, and Archaeological Resources Condition 2.

[Historic, Cultural and Archeological Resources Condition 3]

#### STANDARD: SITING STANDARDS FOR TRANSMISSION LINES (TL) [DIVISION 24]

#### STANDARD. STANDARDS FOR TRANSPOSION EINES (TE) [DIVISION

Prior to placing the facility in service, the certificate holder shall take the following steps to reduce the risk of induced current and nuisance shocks:

#### OPR-TL-01

- a. Provide to landowners a map of overhead transmission lines on their property and advise landowners of possible health and safety risks from induced currents caused by electric and magnetic fields.
- b. Implement a safety protocol to ensure adherence to National Electric Safety Code grounding requirements.

[Siting Standards for Transmission Lines Condition 2]

During operation, the certificate holder shall:

- a. Annually update the Public Utility Commission Safety Staff as to how the operator will comply with OAR Chapter 860, Division 024 considering future operations, maintenance, emergency response, and alterations until project retirement.
- b. File information with the Commission before January 2 of each even-numbered year, as required by ORS 758.013:
  - The name and contact information of the person that is responsible for the operation and maintenance of the electric power line, and for ensuring that the electric power line is safe; and

#### OPR-TL-02

- ii. The name and contact information of the person who is responsible for responding to conditions that present an imminent threat to the safety of employees, customers and the public.
- iii. In the event that the contact information described above in Siting Standards for Transmission Lines Condition 5(b) changes or that ownership of the electric power line changes, the person who engages in the operation of the electric power line must notify the commission of the change as soon as practicable, but no later than within 90 days.
- c. Provide Public Utility Commission Safety Staff with:
  - Maps and drawings of routes and installation of electrical supply lines showing:

- 11. Transmission lines and structures (over 50,000 Volts)
- 12. Distribution lines and structures differentiating underground and overhead lines (over 600 Volts to 50,000 Volts)
- 13. Substations, station, roads and highways
- ii. Plan and profile drawings of the transmission lines (and name and contact information of responsible professional engineer).
- d. Document compliance with the above provisions in its annual report to the Department as provided in General Standard Condition 4.

[Siting Standards for Transmission Lines Condition 5]

#### STANDARD: NOISE CONTROL REGULATIONS (NC) [OAR 340-035-0035]

#### During operation:

a. Pursuant to OAR 340-035-0010, an exception to compliance with the ambient antidegradation standard at OAR 340-035-0035(1)(b)(B) (which prohibits an increase of more than 10 dBA above ambient sound pressure levels) is granted during facility operation when there is foul weather (a rain rate of 0.8 to 5 millimeters per hour), which Council finds constitutes an infrequent event under OAR 345-035-0035(6)(a).

#### OPR-NC-01

- b. The ambient antidegradation standard at OAR 340-035-0035(1)(b)(B) may be exceeded by the transmission line at any time of day or night during foul weather events (defined as a rain rate of 0.8 to 5 millimeters per hour). [OAR 340-035-0010(2)]
- c. The quantity and quality of noise generated in exceedance of the ambient antidegradation standard OAR 340-035-0035(1)(b)(B), during foul weather events (defined as a rain rate of 0.8 to 5 millimeters per hour), shall not be more than 10 dBA (or ambient plus 20 dBA). [OAR 340-035-0010(2)]

[Noise Control Condition 4]

#### During operation:

### OPR-NC-02

- a. A variance to compliance with the ambient antidegradation standard at OAR 340-035-0035(1)(b)(B) (i.e. an increase of 10 dBA above ambient sound pressure levels) is granted pursuant to OAR 345-035-0100(1) for the transmission line at any time of day or night during foul weather events (defined as a rain rate of 0.8 to 5 millimeters per hour).
- The ambient antidegradation standard at OAR 340-035-0035(1)(b)(B) may be exceeded by the transmission line at any time of day or night. [OAR 340-035-0100]

[Noise Control Condition 5]

#### **5.6 Retirement Conditions**

(* <u>-</u>	
STANDARD: R	RETIREMENT AND FINANCIAL ASSURANCE (RT) [OAR 345-022-0050]
RET-RT-01	The certificate holder must retire the facility in accordance with a retirement plan approved by the Council if the certificate holder permanently ceases construction or operation of the facility. The retirement plan must describe the activities necessary to restore the site to a useful, nonhazardous condition, as described in OAR 345-027-0110(5). After Council approval of the plan, the certificate holder must obtain the necessary authorization from the appropriate regulatory agencies to proceed with restoration of the site.  [Retirement and Financial Assurance Condition 2; Mandatory Condition OAR 345-025-0006(9)]
RET-RT-02	The certificate holder is obligated to retire the facility upon permanent cessation of construction or operation. If the Council finds that the certificate holder has permanently ceased construction or operation of the facility without retiring the facility according to a final retirement plan approved by the Council, as described in OAR 345-027-0110, the Council must notify the certificate holder and request that the certificate holder submit a proposed final retirement plan to the Department within a reasonable time not to exceed 90 days. If the certificate holder does not submit a proposed final retirement plan by the specified date, the Council may direct the Department to prepare a proposed final retirement plan for the Council's approval.  Upon the Council's approval of the final retirement plan, the Council may draw on the bond or letter of credit described in OAR 345-025-0006(8) to restore the site to a useful, nonhazardous condition according to the final retirement plan, in addition to any penalties the Council may impose under OAR Chapter 345, Division 29. If the
	amount of the bond or letter of credit is insufficient to pay the actual cost of retirement, the certificate holder must pay any additional cost necessary to restore the site to a useful, nonhazardous condition. After completion of site restoration, the Council must issue an order to terminate the site certificate if the Council finds that the facility has been retired according to the approved final retirement plan.  [[Retirement and Financial Assurance Condition 3; Mandatory Condition OAR 345-025-0006(16)]

#### 6.0 Successors and Assigns

To transfer this site certificate or any portion thereof or to assign or dispose of it in any other manner, directly or indirectly, the certificate holder shall comply with OAR 345-027-0400.

#### 7.0 Severability and Construction

If any provision of this agreement and certificate is declared by a court to be illegal or in conflict with any law, the validity of the remaining terms and conditions shall not be affected, and the rights and obligations of the parties shall be construed and enforced as if the agreement and certificate did not contain the particular provision held to be invalid.

#### 8.0 Execution

This site certificate may be executed in counterparts and will become effective upon signature by the Chair of the Energy Facility Siting Council and the authorized representative of the certificate holder.

**IN WITNESS THEREOF**, this site certificate has been executed by the State of Oregon, acting by and through the Energy Facility Siting Council and Idaho Power Company (certificate holder).

ENERGY FACILITY SITING COUNCIL	Idaho Power Company
Ву:	Ву:
Kent Howe, Vice Chair	Authorized Representative
Date:	Date:
	Ву:
	Date:

## Attachment A Facility Location Mapsets (ASC Exhibit C)

# Attachment 7-1. Soil Properties by Soil Map Unit

Table 1. Soil Properties by Soil Map Unit

Soil ID	Soil Name	Wind Erodibility	K Factor	Slope %	T Factor	Stony/Rocky	Droughty	Depth to Bedrock (inches)	RFA 1 Site Boundary (acres)
Morrow Co	ounty								139.1
Little Junipe	er Canyon Alter	rnative							78.7
90	Ritzville	5	0.49	19	5	N	N	38	78.7
Other Acce	ss Roads	·					50 0		61.9
82	Warden	3	0.55	4	5	N	Y	58	36.7
385	Hermiston	5	0.37	2	5	N	N	NA	1.0
392	Lickskillet	8	0.32	23	1	Y	Y	25	24.1
Umatilla Co	ounty								71.3
Other Acce	ss Roads								71.3
53	Gurdane	6	0.43	16	2	N	N	15	33.2
84	Hall Ranch	7	0.37	24	3	Y	Y	41	27.6
110	Morrow	6	0.37	4	2	N	N	25	10.4
<b>Union Cou</b>	nty								36.7
Other Acce	ss Roads								36.7
84	Hall Ranch	7	0.37	24	3	Υ	Υ	41	18.4
141	Gwinly	8	0.37	24	1	Υ	Υ	38	1.3
143	La Grande	6	0.28	1	5	N	N	NA	3.4
163	Ruckles	8	0.332791	7	1	Υ	Y	41	13.5
Baker Cou	nty								564.9
True Blue C	<b>Sulch Alternativ</b>	<u>re</u>							339.4
262	Ateron	8	0.43	7	1	Υ	Y	43	339.4
Durbin Qua	rry Alternative	ųs	5 S		41 14		<u> </u>		130.0
486	Snaker	8	0.32	40	1	Υ	Y	41	11.5
528	Ruckles	8	0.332791	7	1	Υ	Y	41	84.2
540	Hyall	8	0.32	48	5	Υ	Y	74	34.3

Soil ID	Soil Name	Wind Erodibility	K Factor	Slope %	T Factor	Stony/Rocky	Droughty	Depth to Bedrock (inches)	RFA 1 Site Boundary (acres)
Other Acce	ss Roads								95.5
199	Ateron	8	0.43	7	1	Υ	Y	43	7.9
202	Ateron	8	0.43	7	1	Υ	Y	43	3.0
431	Coughanour	6	0.37	5	3			NA	3.6
436	Ateron	8	0.43	7	1	Υ	Y	43	2.0
437	Hyall	8	0.32	48	5	Υ	Y	74	2.6
445	Hyall	8	0.32	48	5	Υ	Y	74	15.4
447	Durkee	7	0.28	7	2	Υ	Y	43	1.6
474	Ruckles	8	0.332791	7	1	Υ	Y	41	1.6
486	Snaker	8	0.32	40	1	Υ	Y	41	39.0
487	Hyall	8	0.32	48	5	Υ	Y	74	2.4
540	Hyall	8	0.32	48	5	Υ	Y	74	16.3
Malheur Co	ounty					×			139.1
Other Acce	ss Roads								139.1
213	Poall	3	0.43	7	3		Υ	4	1.5
220	Chilcott	5	0.49	4	2			NA	27.8
233	Ruckles	8	0.332791	7	1	Υ	Y	41	52.9
234	Chilcott	5	0.49	4	2			NA	5.3
236	Baldock	4L	0.32	1	5			77	6.4
251	Nyssaton	4L	0.49	1	5			77	2.0
261	Willhill	6	0.3072	14	2	Υ	Y	30	7.9
540	Hyall	8	0.32	48	5	Υ	Y	74	7.2
647	Shoofly	6	0.333333	2	1	Υ		35	28.2
							I	RFA 1 Total	952.5

# Attachment 7-2. Identification, Assessment, and Visual Analysis of Protected Areas

**Table 1. Summary of Impact Determinations for Protected Areas** 

Table 1. Summ	ary of Impact Determinations	s for Protected A	reas					
Applicable Protected Area Category (OAR 345-001-0010[49] subsection) <sup>1</sup>	Land Management Agency Contact Information	Protected Area Resource within the Updated Analysis Area² (Pale green indicates new resource)	State - County	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) <sup>3</sup> (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Construction Noise Impact Level <sup>4</sup>	Traffic Impact	Visual Impact Intensity Level	Map Sheet Reference
	United States Forest Service (USFS), Wallowa-Whitman National Forest 1550 Dewey Avenue, Suite A Baker City, OR 97814 (541) 523-6391 SM.FS.wwnf-webmail@usda.gov	Eagle Cap Wilderness	OR - Baker, Union, Wallowa	14.4 mi W (no decrease from approved Project)	Negligible construction-related noise impacts due to distance of protected area from construction noise sources (including access roads) and the expected attenuation of Aweighted decibel (dBA) levels based on distance (see Exhibit X of the Application for Site Certificate [ASC]).	No traffic impacts during construction, due to distance from the updated site boundary, distance from multi-use areas in Union and Baker counties, and because Eagle Cap Wilderness is not situated along any of the preliminary Project roads. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1,2
Wilderness Areas (c)	USFS, Umatilla National Forest 72510 Coyote Road Pendleton, OR 97801 (541) 427-3231 r6_umatilla_public_inquiries@fs.fed.us	North Fork John Day Wilderness	OR - Baker, Grant, Umatilla	19.1 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to distance of protected area from construction noise sources (including access roads) and the expected attenuation of dBA levels based on distance (see Exhibit X of the ASC).	No traffic impacts during construction due to the distance from the updated site boundary, distance from multi-use areas, and because the Wilderness is situated on the other side of I-84 from nearby multi-use areas and access roads in Union and Baker Counties. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1,2
	USFS, Umatilla National Forest 72510 Coyote Road Pendleton, OR 97801 (541) 427-3231 r6_umatilla_public_inquiries@fs.fed.us	North Fork Umatilla Wilderness	OR - Umatilla, Union	18.7 mi SW (no decrease from approved Project)	Negligible construction-related noise impacts due to distance of protected area from construction noise sources (including access roads) and the expected attenuation of dBA levels based on distance (see Exhibit X of the ASC).	No traffic impacts during construction due to the distance from the updated site boundary, distance from the multi-use areas UM-06 and UM-07, and because it is situated on the other side of I-84 from the closest Project areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1,2
	USFS, Wallowa-Whitman National Forest 1550 Dewey Avenue, Suite A Baker City, OR 97814 (541) 523-6391 SM.FS.wwnf-webmail@usda.gov	Five Points Creek (Wild)	OR - Umatilla, Union	2.4 mi S (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant, temporary traffic impacts possible during construction due to proximity to I-84, access roads, and La Grande. No or negligible impacts during operation.	Low	1,2
	USFS, Wallowa-Whitman National Forest 1550 Dewey Avenue, Suite A Baker City, OR 97814 (541) 523-6391 SM.FS.wwnf-webmail@usda.gov	North Fork Catherine Creek (Recreational)	OR - Union	13.6 mi W (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to far distance from route and any multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	2
National Wild, Scenic, or Recreational River, or State Scenic Waterway (d, n)	USFS, Wallowa-Whitman National Forest 1550 Dewey Avenue, Suite A Baker City, OR 97814 (541) 523-6391 SM.FS.wwnf-webmail@usda.gov	North Fork Catherine Creek (Wild)	OR - Union	15.2 mi W (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to far distance from route and any multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	2
	USFS, Wallowa-Whitman National Forest 1550 Dewey Avenue, Suite A Baker City, OR 97814 (541) 523-6391 SM.FS.wwnf-webmail@usda.gov	North Powder River (Scenic)	OR - Baker	16.5 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant, temporary traffic impacts possible during construction due to proximity of I-84, access roads, and UN-04 on west side of route; no or negligible impacts during operation.	Not Analyzed <sup>5</sup>	2
	Bureau of Land Management (BLM), Vale District 100 Oregon Street Vale, OR 97918 (541) 473-3144 LM_OR_VL_Mail@blm.gov	Powder River (Scenic)	OR - Baker, Union	9.8 mi SW (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction; however noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant temporary traffic impacts possible during construction due to close proximity to I-84, US 203, access roads, and multi-use areas UN-04 and BA-01. No or negligible impacts during operation.	Medium	2

Applicable Protected Area Category (OAR 345-001-0010[49] subsection) <sup>1</sup>	Land Management Agency Contact Information	Protected Area Resource within the Updated Analysis Area <sup>2</sup> (Pale green indicates new resource)	State - County	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) <sup>3</sup> (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Construction Noise Impact Level <sup>4</sup>	Traffic Impact	Visual Impact Intensity Level	Map Sheet Reference
	USFS, Wallowa-Whitman National Forest 1550 Dewey Avenue, Suite A Baker City, OR 97814 (541) 523-6391 SM.FS.wwnf-webmail@usda.gov	Upper Grande Ronde River (Recreational)	OR - Union	11.0 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to far distance from the updated site boundary, access roads, and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1,2
	USFS, Wallowa-Whitman National Forest 1550 Dewey Avenue, Suite A Baker City, OR 97814 (541) 523-6391 SM.FS.wwnf-webmail@usda.gov	Upper Grande Ronde River (Wild)	OR - Grant, Union	16.4 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to far distance from the updated site boundary, access roads, and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1,2
	USFWS 13751 Upper Embankment Road Nampa, ID 83686 (208) 467-9278 deerflat@fws.gov	Deer Flat National Wildlife Refuge (NWR) (including Snake River Island Units)	OR - Malheur; ID - Ada, Canyon, Owyhee, Payette, Washington	0.6 mi SW (no decrease from approved Project)	Less than significant temporary construction- related noise impacts due to proximity of the updated site boundary; however, noise impacts will be temporary and episodic and dBA levels will attenuate with distance (see Exhibit X of the ASC). Areas located the farthest north near a MUA may experience temporary traffic-related noise.	Less than significant temporary traffic impacts possible during construction. Although portions of the Refuge are close to the Project site, others are several miles away. Many are more accessible from US 95 in Idaho than they are to I-84 in Oregon. Those parcels most affected will be near Huntington and Adrian, OR. Closest MUAs are those in Malheur and Owyhee counties. No or negligible impacts during operation.	Low	3
National Wildlife Refuges (e)	USFWS No street listed Pendleton, OR 97801 (509) 546-8300 No email listed	McKay Creek NWR	OR - Umatilla	9.6 mi S (0.1 mi decrease from approved Project)	Less than significant temporary construction- related noise impacts due distance of the updated site boundary and attenuation of dBA levels. Areas located along US 395 may experience temporary traffic-related noise as vehicles access the updated site boundary from I-84.	Less than significant, temporary traffic impacts during construction due to the proximity of UM-04 about eight miles away and the position of the Refuge along US 395 outside Pilot Rock between I-84 and the updated site boundary. No or negligible impacts during operation.	Not Analyzed <sup>6</sup>	1,2
	USFWS 72650 Riverview Lane Irrigon, OR 97844 (509) 546-8300 No email listed	Umatilla NWR	OR - Morrow; WA - Benton	12.7 mi S (no decrease from approved Project)	Negligible construction-related noise impacts construction-related noise impacts due to proximity of protected area to I-84.	Less than significant temporary traffic impacts possible during construction due to proximity of I-84 and US 730, multi-use area MO-01, and existing access roads. No proposed temporary haul routes in the vicinity of the NWR. No or negligible impacts during operation.	Medium	1
	BLM 1387 South Vinnell Way Boise, ID 83709 (208) 373-4000 Blm_id_stateoffice@blm.gov	Hixon Columbian Sharp-tailed Grouse Habitat Area Area of Critical Environmnetal Concern (ACEC)	ID - Washington	17.3 mi SW (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance from the updated site boundary, access roads and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	2,3
Federal Land Management Plan Designated Lands (i)	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Dry Creek Gorge ACEC	OR - Malheur	15.9 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance from the updated site boundary, access roads and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Hammond Hill Sand Hills Research National Area (RNA)	OR - Malheur	19.5 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance from the updated site boundary, access roads and multi-use areas OW-01, OW-02, and OW-03. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3

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	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Honeycombs RNA	OR - Malheur	11.5 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance from the updated site boundary, access roads and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Horn Butte ACEC	OR - Gilliam, Morrow	18.1 mi W (0.1 mi decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance from the updated site boundary, access roads and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Hunt Mountain ACEC	OR - Baker	12.9 mi W (0.2 mi decrease from approved Project)	because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance of at least 10 miles from the updated site boundary, access roads, and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	2
	BLM 1387 South Vinnell Way Boise, ID 83709 (208) 373-4000 Blm_id_stateoffice@blm.gov	Jump Creek Canyon ACEC	ID - Owyhee	6.9 mi NW <sup>7</sup> (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant, temporary traffic impacts possible during construction due to close proximity to the updated site boundary, access roads, and multi-use areas OW-02 and OW-03. No or negligible impacts during operation.	Not Analyzed <sup>6</sup>	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Keating Riparian ACEC/RNA	OR - Baker	15.0 mi W (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to far distance from the updated site boundary, access roads, and multi-use areas BA-01 and BA-02. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3
	BLM 1387 South Vinnell Way Boise, ID 83709 (208) 373-4000 Blm_id_stateoffice@blm.gov	Leslie Gulch ACEC	ID - Owyhee	18.2 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance from the updated site boundary, access roads and multi-use areas OW-01, OW-02, OW-03, and OW-04. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3
	BLM 1387 South Vinnell Way Boise, ID 83709 (208) 373-4000 Blm_id_stateoffice@blm.gov	Long-billed Curlew Habitat Area ACEC	ID - Ada, Canyon, Gem, Payette	12.4 mi E (2.3 mi decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance from the updated site boundary, access roads, and multi-use areas MA-07 and MA-08. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3
	BLM 1387 South Vinnell Way Boise, ID 83709 (208) 373-4000 Blm_id_stateoffice@blm.gov	McBride Creek RNA	ID - Owyhee	15.4 mi N <sup>7</sup> (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance of over 10 miles from the updated site boundary, access roads, and multi-use area OW-03. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3

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	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	North Ridge Bully Creek ACEC/RNA	OR - Malheur	20.0 mi SE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance of over 15 miles from the updated site boundary, access roads, and nearest multi-use areas (MA-2, MA-03, and MA-04). No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Oregon Trail ACEC - Birch Creek parcel	OR - Malheur	0.3 mi E (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to close proximity to I-84, access roads, multiuse area MA-01, and the updated site boundary.	Less than significant, temporary traffic impacts possible during construction due to close proximity to I-84, access roads, multi-use area MA-01, and the updated site boundary. No or negligible impacts during operation.	Medium	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Oregon Trail ACEC - Blue Mountain Parcel	OR - Union	0.9 mi SW (no decrease from approved Project)	Less than significant, temporary construction-related noise impacts due to proximity of the updated site boundary, MUAs, and access roads; however, impacts would be temporary and episodic. Noise-related impacts would also be mitigated by the close proximity of I-84 and its contribution to existing baseline noise levels.	Less than significant, temporary traffic impacts possible during construction due to close proximity to I-84, the updated site boundary, access roads. Nearest multi-use areas (UM-07 and UN-01) are over ten miles away. No or negligible impacts during operation.	Low	1,2
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Oregon Trail ACEC - Echo Meadows Parcel	OR - Umatilla	10.9 mi NE (0.2 mi decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant, temporary traffic impacts possible during construction due to location near I-84 and OR 207 between Hermiston and several multi-use areas (UM-01, MO-02 and MO-03). No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Oregon Trail ACEC - Keeney Pass Parcel	OR - Malheur	5.4 mi W (0.3 mi decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to traffic on US 20. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to location along US 20 and US 26 between Ontario and several multi-use areas (MA-02, MA-03, MA-04, MA-05, and MA-06). No or negligible traffic impacts during operation.	Not Analyzed <sup>6</sup>	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Oregon Trail ACEC – National Historic Oregon Trail Interpretive Center (NHOTIC) Parcel	OR - Baker	2.1 mi SW (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary and access roads. However, noise will be temporary and episodic, and dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant temporary traffic impacts possible during construction due to close proximity to access roads, the updated site boundary, I-84, US 30, and two multi-use areas (BA-01 and BA-02). No or negligible impacts during operation.	Medium	2
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Oregon Trail ACEC - Powell Creek Parcel	OR - Baker	2.2 mi W (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary, MUAs, and access roads. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to close proximity to multi-use area BA-05, I-84, access roads, and the updated site boundary No or negligible impacts during operation.	Medium	2
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Oregon Trail ACEC - Straw Ranch 1 Parcel	OR - Baker	0.1 mi E (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary, MUAs, and access roads. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to close proximity to multi-use area BA-03, I-84, access roads, and the updated site boundary. No or negligible impacts during operation.	Medium	2

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	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Oregon Trail ACEC - Straw Ranch 2 Parcel	OR - Baker	1.9 mi SE (no decrease from approved Project)	impacts possible during construction due to proximity to the updated site boundary, MUAs, and access roads. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to close proximity to multi-use area BA-03, I-84, access roads, and the updated site boundary. No or negligible impacts during operation.	Low	2
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Oregon Trail ACEC - Tub Mountain Parcel	OR - Malheur	1.5 mi E (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary, MUAs, and access roads. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Project construction activity will occur to the east and south requiring visitors to cross the construction area when accessing the SRMA, likely causing intermittent delays. Temporary traffic impacts possible during construction due to this arrangement, as well as close proximity of I-84, access roads, the updated site boundary, and multi-use area MA-02. No or negligible impacts during operation.	High	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Oregon Trail ACEC - White Swan Parcel	OR - Baker	2.9 mi S (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary, MUAs, and access roads. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to proximity to I-84, access roads, the updated site boundary, and multi-use area BA-02. No or negligible impacts during operation.	None <sup>8</sup>	2
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Owyhee River Below the Dam ACEC	OR - Malheur	1.9 mi E (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary, MUAs, and access roads. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary intermittent traffic delays during construction possible for some visitors due to very close proximity to the updated site boundary and access roads, as well as multi-use areas (MA-07 and MA-08) about 5 miles away. No or negligible impacts during operation.	Medium	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Owyhee Views ACEC	OR - Malheur	7.2 mi E (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary, MUAs, and access roads. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to access roads and the updated site boundary about 5 miles away, as well as three multi-use areas located between 6 and 9 miles away (MA-07, MA-08, and MA-09). No or negligible impacts during operation.	Not Analyzed <sup>6</sup>	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Powder River Canyon ACEC	OR - Baker	8.8 mi SW (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary and access roads; however, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to position along OR 203 near the updated site boundary, with multi-use area BA-01 about 4 miles away. No or negligible impacts during operation.	Medium	2
	BLM 1387 South Vinnell Way Boise, ID 83709 (208) 373-4000 Blm_id_stateoffice@blm.gov	Squaw Creek RNA	ID - Owyhee	11.5 mi NW <sup>7</sup> (0.1 mi decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant, temporary traffic impacts possible during construction due to proximity to multi-use area MA-09. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	South Alkali Sand Hills ACEC	OR - Malheur	5.8 mi W (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to location along US 26 and proximity to the updated site boundary. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to position along US 20 and US 26 between Ontario and several multi-use areas, especially MA-02. No or negligible impacts during operation.	Low	3

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	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	South Ridge Bully Creek RNA	OR - Malheur	17.4 mi SE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance from the updated site boundary, access roads, and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Boardman RNA	OR - Morrow	2.0 mi S	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary, an MUA, I-84, an existing 69-kilovolt Bonneville Power Administration transmission line (along Bombing Range Road), and access roads (including Bombing Range Road), and exclusion of the public from the RNA. 10 However, noise will be temporary and episodic, and dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant temporary traffic impacts possible during construction due to close proximity to access roads, multi-use area MO-01, the updated site boundary, and I-84, and exclusion of the public from the RNA. No or negligible impacts during operation.	Medium	1
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Boardman/Willow Creek RNA	OR - Morrow	6.1 mi E	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant temporary traffic impacts possible during construction due to close proximity to access roads, multi-use area MO-01, the updated site boundary, and I-84. No or negligible impacts during operation.	Not Analyzed <sup>6</sup>	1
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Birch Creek Cove RNA	OR - Umatilla	6.9 mi N	Less than significant, temporary noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC). Areas along US 395 may experience traffic-related noise; however, impacts will be temporary, episodic, and less than significant.	Less than significant, temporary traffic impacts possible during construction due to use of I-84 and US 395 as Preliminary Haul Roads for multi-use area UM-03, which lies along the access route to Birch Creek Cove from I-84. No or negligible impacts during operation.	Not Analyzed <sup>6</sup>	1,2
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Rebecca Sand Hill RNA/ACEC	ID - Washington	16.8 mi W	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to far distance from the updated site boundary, access roads, and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Government Draw RNA	OR - Union	10.8 mi NW	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to far distance along US 244 from the updated site boundary and being over 10 miles from the closest multi-use area. No or negligible impacts during operation.	None <sup>9</sup>	1,2
	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	Indian Creek RNA	OR - Union	16.3 mi SW	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to far distance from the updated site boundary, access roads, and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1,2

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Subsectiony	Oregon Parks and Recreation Department (OPRD) 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 park.info@oregon.gov	Battle Mountain Forest State Scenic Corridor		8.4 mi N (no decrease from approved Project)	Less than significant, temporary noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC). Areas along US 395 (Battle Mountain Scenic Corridor) may experience trafficrelated noise; however impacts will be temporary, episodic, and less than significant.	Less than significant, temporary traffic impacts possible during construction due to use of I-84 and US 395 as Preliminary Haul Roads for multi-use area UM-03, which lies along the access route to Battle Mountain from I-84. No or negligible impacts during operation.	Not Analyzed <sup>6</sup>	1,2
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 park.info@oregon.gov	Blue Mountain Forest State Scenic Corridor	OR - Umatilla, Union	Crosses (no decrease from approved Project)	Less than significant temporary construction- related noise impacts due to proximity of the updated site boundary to this protected area, and the location where this protected area is crossed. Areas near haul routes and MUAs may experience traffic-related noise; however impacts will be temporary and episodic.	Less than significant temporary traffic impacts possible during construction as a result of nearby Preliminary Haul Roads including I-84, other access roads, and multi-use area UM-07; no or negligible impacts during operation.	Low	1,2
State Parks,	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 park.info@oregon.gov	Catherine Creek State Park	OR - Union	9.0 mi W (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction. No or negligible impacts during operation. Nearest multi-use area (UN-03) is nearly ten miles away, the Park does not fall between the UN-03 and the Project area.	Not Analyzed <sup>6</sup>	1,2
Waysides, Corridors, Monuments, Historic, and Recreation Areas (j)	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 park.info@oregon.gov	Emigrant Springs State Heritage Area		2.9 mi SW (0.4 mi decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance and location of this protected area near I-84 (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to proximity of I-84 and Project access roads that may be used to access multi-use area UM-07 about 5 miles away; no or negligible impacts during operation.	Low	1,2
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 869-2365 park.info@oregon.gov	Farewell Bend State Recreation Area (SRA)		0.4 mi W (0.3 mi decrease from approved Project)	Less than significant, temporary construction-related noise impacts due to proximity of the updated site boundary, MUAs, and access roads; however impacts would be temporary and episodic. Noise-related impacts would also be mitigated by the close proximity of I-84 and its contribution to existing baseline noise levels.	Less than significant, temporary traffic impacts possible during construction due to proximity to multi-use area UM-06, I-84, US 30, and several access roads; no or negligible impacts during operation.	Medium	3
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 park.info@oregon.gov	Hilgard Junction State Park		0.6 mi SE (no decrease from approved Project)	Less than significant, temporary construction-related noise impacts due to close proximity of the updated site boundary, Preliminary Hauling Roads, and access roads. Impacts would be temporary and episodic.	Less than significant, temporary traffic impacts possible during construction due to close proximity of the updated site boundary, Preliminary Hauling Roads, and access roads; nearest multi-use area (UN-01) is about 7 miles away. No or negligible impacts during operation.	Low	1,2
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 339-2331 park.info@oregon.gov	Lake Owyhee State Park	OR - Malheur	8.1 mi E (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to the location of the Park on the other side of highway.  Nearest multi-use areas are MA-08 and MA-09. No or negligible impacts during operation.	Not Analyzed <sup>6</sup>	3

Applicable Protected Area Category (OAR 345-001-0010[49] subsection) <sup>1</sup>	Land Management Agency Contact Information	Protected Area Resource within the Updated Analysis Area <sup>2</sup> (Pale green indicates new resource)	State - County	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) <sup>3</sup> (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Construction Noise Impact Level <sup>4</sup>	Traffic Impact	Visual Impact Intensity Level	Map Sheet Reference
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 park.info@oregon.gov	Ontario State Recreation Site	OR - Malheur; ID - Payette	13.9 mi NW (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance from multi-use areas and Project areas (over 10 miles). No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 park.info@oregon.gov	Red Bridge State Wayside	OR - Union	5.2 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant, temporary traffic impacts possible during construction due to proximity access roads, proposed haul routes, and multiuse areas UM-07 and UN-01. No or negligible impacts during operation.	Low	1,2
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 park.info@oregon.gov	Succor Creek State Natural Area (SNA)	OR - Malheur	3.5 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant, temporary traffic impacts possible during construction due to proximity to access roads and multi-use areas including MA-09 and OW-01. No or negligible impacts during operation.	Low	3
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 park.info@oregon.gov	Ukiah-Dale Forest State Scenic Corridor	OR - Umatilla	19.5 mi N (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant, temporary traffic impacts possible during construction due to location along 395 which is a proposed haul route; the nearest multi-use area is UM-03. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1,2
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 park.info@oregon.gov	Unity Forest State Scenic Corridor	OR - Baker	10.6 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to far distance from route and position along US 26 away from any multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	2
	The Nature Conservancy 821 SE 14th Avenue Portland, OR 97214 (503) 802-8100 oregon@tnc.org	Lindsay Prairie Preserve/ State Natural Heritage Area (SNHA)	OR - Morrow	1.3 mi E (0.3 mi decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary; however, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to close proximity to the updated site boundary and multi-use area MO-02. No or negligible impacts during operation.	Medium	î
State Natural Areas (I)	The Nature Conservancy 821 SE 14th Avenue Portland, OR 97214 (503) 802-8100 oregon@tnc.org	Sumpter ∀alley Dredge SNHA	OR - Baker	19.5 mi E (1.8 mi decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to far distance from the updated site boundary, access roads, and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	2
	Blue Mountain Land Trust 6 ½ N Second Avenue, Suite 304 Walla Walla, WA 99362 (509) 525-3136 No email listed	Glass Hill Preserve/ SNHA	OR - Union	1.6 mi W	Less than significant, temporary noise impacts possible during construction where the updated site boundary and access roads cross the protected area and near the multiuse area. The area is likely restricted from public access. 11 However, noise will be temporary and episodic, and dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant temporary traffic impacts associated with increased traffic on I-84, Glass Hill Road, Bushnell Lane, location between La Grande and multi-use area UN-02 and overlap of access roads and the updated site boundary at the area. The area is likely restricted from public access. <sup>10</sup> No or negligible impacts during operation.	Medium	1,2

Applicable Protected Area Category (OAR 345-001-0010[49] subsection) <sup>1</sup>	Land Management Agency Contact Information	Protected Area Resource within the Updated Analysis Area <sup>2</sup> (Pale green indicates new resource)	State - County	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) <sup>3</sup> (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Construction Noise Impact Level <sup>4</sup>	Traffic Impact	Visual Impact Intensity Level	Map Sheet Reference
	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Columbia Basin - Coyote Springs Widllife Area	OR - Morrow	12.2 mi S (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to access roads and proximity to a MUA. However, noise will be temporary and episodic and dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to use of access roads running through the Parcel and close proximity to multi-use area MO-01, I-84, and the updated site boundary. No or negligible impacts during operation.	Low	1
	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Columbia Basin - Irrigon Wildlife Area	OR - Morrow, Umatilla	17.9 mi SW (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to location along US 730. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to location along US 730 between Hermiston and multiuse area MO-01, as well as proximity to I-82, Hermiston, and multi-use area UM-01. No or negligible traffic impacts during operation.	Not Analyzed <sup>6</sup>	1
	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Columbia Basin - Willow Creek Wildlife Area/SNHA	OR - Gilliam	19.9 mi SE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance of over 15 miles from the updated site boundary access roads, and multi-use areas. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1
State Wildlife	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Elkhorn - Auburn Wildlife Area Tract	OR - Baker	8.4 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to the position on the other side of Baker City from all planned access roads, the updated site boundary, and the closest multi-use area (BA-02). No or negligible impacts during operation.	Not Analyzed <sup>6</sup>	2
Refuge or Management Areas (o)	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Elkhorn - Muddy Creek Wildlife Area Tract	OR - Baker	14.5 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to the position on the other side of North Powder and Baker City from all planned access roads, the updated site boundary, I-84, and multi-use area UN-04. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1,2
	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Elkhorn - North Powder Wildlife Area Tract	OR - Baker, Union	7.5 mi NE (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to the position on the other side of North Powder and Baker City from all planned access roads, the updated site boundary, I-84, and multi-use area UN-04. No or negligible impacts during operation.	None <sup>6</sup>	1,2
	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Elkhorn - Roth Wildlife Area Tract	OR - Baker	13.1 mi SE (1.5 mi decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to the position on the other side of North Powder and Baker City from all planned access roads, the updated site boundary, I-84, and multi-use area BA-01.	Not Analyzed <sup>5</sup>	2
	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Ladd Marsh Wildlife Area/SNHA	OR - Union	4.5 mi NW (no decrease from approved Project)	Less than significant, temporary noise impacts possible during construction where the updated site boundary and access roads cross near the protected area and near the multi-use area. However, noise will be temporary and episodic, and dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant temporary traffic impacts associated with increased traffic on I-84, location between La Grande and multi-use area UN-02, and proximity of access roads and the updated site boundary to the area. No or negligible impacts during operation.	Medium	1,2

Applicable Protected Area Category (OAR 345-001-0010[49] subsection) <sup>1</sup>	Land Management Agency Contact Information	Protected Area Resource within the Updated Analysis Area <sup>2</sup> (Pale green indicates new resource)	State - County	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) <sup>3</sup> (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Construction Noise Impact Level <sup>4</sup>	Traffic Impact	Visual Impact Intensity Level	Map Sheet Reference
cussosiiciij	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Rogers Wildlife Area		6.7 mi SW (0.4 mi decrease from approved Project)	Less than significant, temporary noise impacts possible during construction due to location along OR 201. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to location along OR 201 between Ontario and two multiuse areas (MA-07 and MA-08). No or negligible traffic impacts operation.	Not Analyzed <sup>6</sup>	3
	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Payette River Wildlife Area	OR - Malheur	12.7 mi NW	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance from multi-use areas and Project areas (over 10 miles). No or negligible impacts during operation.	None <sup>8</sup>	3
State Fish	Oregon Department of Fish and Wildlife (ODFW) 74135 Riverview Lane Irrigon, OR 97844 (541) 922-5732 odfw.info@odfw.oregon.gov	Irrigon Hatchery	OR - Morrow	17.7 mi SW (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant temporary traffic impacts possible during construction due to location of Hatchery along US 730. No or negligible impacts during operation.	Not Analyzed <sup>6</sup>	1
Hatcheries (p)	ODFW 73959 Riverview Lane Irrigon, OR 97844 (541) 922-5659 odfw.info@odfw.oregon.gov	Umatilla Hatchery	OR - Morrow	18.3 mi S (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to distance of over three miles from US 730 and distance of about 5 miles from route and multiuse area MO-01. No or negligible impacts during operation.	Not Analyzed <sup>6</sup>	1
	USFS Pacific Northwest Research Station Forestry and Range Sciences Lab 1401 Gekeler Lane La Grande, OR 97850 (541) 962-6532 hansel.hayden@usda.gov	Starkey Experimental Forest/Game Management Area	OR - Umatilla, Union	8.7 mi NW (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	No traffic impacts during construction due to far distance along US 244 from the updated site boundary and being over 10 miles from the closest multi-use area. No or negligible impacts during operation.	None <sup>9</sup>	1,2
Agricultural Experiment Station,	Oregon State University (OSU) 48037 Tubbs Ranch Road Adams, OR 97810 (541) 278-4186 sutord@oregonstate.edu	Columbia Basin Ag Research Station	OR - Sherman, Umatilla	17.7 mi S (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant traffic impacts during construction due to use of Pendleton as a nearby community for workers and resources.  No traffic impacts during operation.	Not Analyzed <sup>5</sup>	1,2
Experimental Area, or Research Center (q)	OSU 2121 S 1st Street Hermiston, OR 97838 (541) 567-8321 natalie.kinion@oregonstate.edu	Hermiston Ag Research and Extension Center	OR - Umatilla	19.3 mi S (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	possible during construction due to proximity to I-84, multi-use area UM-01, and use of Hermiston as a nearby community for workers and resources. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	1
	OSU 595 Onion Avenue Ontario, OR 97914 (541) 889-2174 janet.jones@oregonstate.edu	Malheur Experiment Station	OR - Malheur	15.5 mi NW (no decrease from approved Project)	Negligible construction-related noise impacts due to attenuation of dBA levels based on distance (see Exhibit X of the ASC) and because this protected area is not situated along any Project roads planned for use during construction.	Less than significant, temporary traffic impacts possible during construction due to proximity to I-84 and use of Ontario as a nearby community for workers and resources. No or negligible impacts during operation.	Not Analyzed <sup>5</sup>	3

Applicable Protected Area Category (OAR 345-001-0010[49]	, ,	Protected Area Resource within the Updated Analysis Area <sup>2</sup> (Pale green indicates		Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) <sup>3</sup> (Orange indicates previously identified resource that decreased in proximity from			Visual Impact Intensity	Map Sheet
subsection) <sup>1</sup>	Contact Information	new resource)	State - County	the approved Project)	Construction Noise Impact Level <sup>4</sup>	Traffic Impact	Level	Reference

<sup>1</sup> Note that as a result of the protected areas OAR updates, some protected areas that previously existed during the original ASC analysis have been incorporated into the RFA1 analysis.

<sup>&</sup>lt;sup>2</sup> Analysis Area, as defined in the Amended Project Order for the ASC, extends 20 miles from the Project site boundary. For the purposes of this analysis, the updated site boundary does not include the previously approved, unchanged portions of the site boundary and solely addresses the the proposed alterations to the site boundary proposed by RFA1.

<sup>&</sup>lt;sup>3</sup> RFA 1 Alterations, which are not inclusive of the previously approved, unchanged portions of the site boundary and solely address the alterations to the site boundary proposed by RFA1.

<sup>&</sup>lt;sup>4</sup> At all protected areas analyzed, typical operational sound levels within the right-of-way (ROW) are low, not exceeding 30 dBA at the edge of the ROW. During infrequent foul weather events, operational sound levels will temporarily increase but will also attenuate with increasing distance from the line.

<sup>&</sup>lt;sup>5</sup> Resource was not analyzed for visual impacts because it was further than 10 miles from the site boundary and therefore outside of the visual analysis area. It is assumed that there are no visual impacts to this resource.

<sup>&</sup>lt;sup>6</sup> Resource was not analyzed for visual impacts because it was further than 5 miles from the site boundary and further than 10 miles from cleared right-of-way in a forested area.

<sup>&</sup>lt;sup>7</sup> Distance is from the site boundary in Oregon, which is the portion of the Project analyzed in this RFA. Impacts have been assessed only in relation to proposed work in Oregon, because work in Idaho is outside the scope of Oregon's RFA process.

<sup>&</sup>lt;sup>8</sup> Resource is completely outside of the modeled bare earth viewshed so there will be no visual impacts to the resource.

<sup>&</sup>lt;sup>9</sup> Resource is greater than 5 miles from the site boundary and outside of the modeled cleared right-of-way viewshed so there will be no visual impacts to the resource.

<sup>&</sup>lt;sup>10</sup> Information on access obtained through a personal communication between Kristen Gulick, Tetra Tech and Kelly Wallis, The Nature Conservancy, July 18, 2022.

<sup>&</sup>lt;sup>11</sup> Information on access obtained through a personal communication between Kristen Gulick, Tetra Tech, and Lindsey Wise, Oregon State University, Institute for Natural Resources, July 13, 2022.

**Table 2. Detailed Visual Analysis of Protected Areas** 

	a Sis)			T 1: Ba aracteri		Pa	rt 2: Impa	nct Assess	sment	Part 3:	Signific	cance Det	ermination
Protected Area by Jurisdiction (Map ID) <sup>1</sup> (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	Scenic Quality / Scenic Attractiveness Class	Landscape Character <sup>2</sup>	Observer Characteristics (Geometry / Exposure) <sup>3</sup>	Impact Duration⁴	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>5</sup>	Contribution of the Project to Impacts <sup>6</sup>	Significance Determination
	N	lational	Wild, S	cenic, a	and Recr	eationa	l Rivers a	and State	Scenic Wa	aterways			
Five Points Creek (Wild)	2.4 mi S (no decrease from approved Project)	1,2	А	Nat App	T; S	LT	Low	Low	Low	Low	NA	PE	Less than Significant
Powder River (Scenic)	9.8 mi SW (no decrease from approved Project)	2	В	Nat App	T; S	LT	Med	Low	Low	Med	NP	CE	Less than Significant
					Nation	al Wildl	ife Refug	jes			I		
Deer Flat NWR	0.6 mi SW (no decrease from approved Project)	3	В	Nat App	T; S	LT	Med	Low	Low	Low	NA	CE	Less than Significant
Umatilla NWR	12.7 mi S (no decrease from approved Project)	1	С	Cult	T; S	LT	Med	Med	Low	Med	NP	CE	Less than Significant

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Protected Area by Jurisdiction (Map ID) <sup>1</sup> (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	Scenic Quality / Scenic Attractiveness Class	Landscape Character <sup>2</sup>	Observer Characteristics (Geometry / Exposure) <sup>3</sup>	Impact Duration <sup>4</sup>	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>5</sup>	Contribution of the Project to Impacts <sup>6</sup>	Significance Determination
			Fed	deral La	nd Mana	gement	Plan De	signated I	_ands				
Oregon Trail ACEC - Birch Creek parcel	0.3 mi E (no decrease from approved Project)	3	С	Hist	T; S	LT	Low	Med	Med	Med	NP	PE	Less than Significant
Oregon Trail ACEC - Blue Mountain Parcel	0.9 mi SW (no decrease from approved Project)	1,2	В	Nat App	T; S	LT	Low	Low	Low	Low	NA	PE	Less than Significant
Oregon Trail ACEC - NHOTIC Parcel	2.1 mi SW (no decrease from approved Project)	2	В	Cult	T; S	LT	Med	Med	Med	Med	NP	CE	Less than Significant
Oregon Trail ACEC - Powell Creek Parcel	2.2 mi W (no decrease from approved Project)	2	С	Cult	Т	LT	Med	Med	Med	Med	NP	CE	Less than Significant

	a (sis)			T 1: Ba aracteri		Pa	rt 2: Impa	nct Assess	sment	Part 3:	: Signifi	cance Det	termination
Protected Area by Jurisdiction (Map ID) <sup>1</sup> (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	Scenic Quality / Scenic Attractiveness Class	Landscape Character <sup>2</sup>	Observer Characteristics (Geometry / Exposure) <sup>3</sup>	Impact Duration⁴	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>5</sup>	Contribution of the Project to Impacts <sup>6</sup>	Significance Determination
Oregon Trail ACEC - Straw Ranch 1 Parcel	0.1 mi E (no decrease from approved Project)	2	С	Cult	Т	LT	Med	Med	Med	Med	NP	CE	Less than Significant
Oregon Trail ACEC - Straw Ranch 2 Parcel	1.9 mi SE (no decrease from approved Project)	2	С	Nat App	Т	LT	Low	Low	Low	Low	NA	CE	Less than Significant
Oregon Trail ACEC - Tub Mountain Parcel	1.5 mi E (no decrease from approved Project)	3	С	Nat App	T; S	LT	Med	High	Low	High	NP	PE	Less than Significant
Owyhee Below Dam ACEC	1.9 mi E (no decrease from approved Project)	3	Α	Nat App	T; S	LT	Med	Med	Low	Med	NP	CE	Less than Significant

	a sis)	S 8	COLUMN 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	T 1: Ba aracteri	Control of the Contro	Pai	rt 2: Impa	nct Assess	sment	Part 3	Signific	cance Det	termination
Protected Area by Jurisdiction (Map ID) <sup>1</sup> (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	Scenic Quality / Scenic Attractiveness Class	Landscape Character <sup>2</sup>	Observer Characteristics (Geometry / Exposure) <sup>3</sup>	Impact Duration <sup>4</sup>	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>5</sup>	Contribution of the Project to Impacts <sup>6</sup>	Significance Determination
Powder River Canyon ACEC	8.8 mi SW (no decrease from approved Project)	2	В	Nat App	T; S	LT	Med	Med	Low	Med	NP	CE	Less than Significant
South Alkali Sand Hills ACEC	5.8 mi W (no decrease from approved Project)	3	С	Nat App	I	LT	Low	Low	Low	Low	NA	PE	Less than Significant
Boardman RNA	2.0 mi S	1	С	Nat App	T; S	LT	Med	Med	Med	Med	NP	CE	Less than Significant
	44	ate Parl	s, Way	sides, (	Corridors	, Monu	ments, H	istoric, an	d Recreat	ion Area	s		
Blue Mountain Forest State Scenic Corridor	Crosses (no decrease from approved Project)	1,2	В	Nat App	Т	LT	Low	Low	Low	Low	NA	PE	Less than Significant
Emigrant Springs State Heritage Area	2.9 mi SW (0.4 mi decrease from approved Project)	1,2	В	Cult	T; S	LT	Low	Low	Low	Low	NA	PE	Less than Significant

	a (sis)	2	570,000,000	T 1: Ba aracteri	CONTRACTOR OF THE PROPERTY OF	Pa	rt 2: Impa	ct Assess	sment	Part 3	Signific	cance Det	termination
Protected Area by Jurisdiction (Map ID) <sup>1</sup> (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	Scenic Quality / Scenic Attractiveness Class	Landscape Character <sup>2</sup>	Observer Characteristics (Geometry / Exposure) <sup>3</sup>	Impact Duration <sup>4</sup>	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>5</sup>	Contribution of the Project to Impacts <sup>6</sup>	Significance Determination
Farewell Bend SRA	0.4 mi W (0.3 mi decrease from approved Project)	3	В	Cult	S	LT	Med	Med	Med	Med	NP	CE	Less than Significant
Hilgard Junction State Park	0.6 mi SE (no decrease from approved Project)	1,2	Α	Cult	T; S	LT	Med	Low	Low	Low	NA	CE	Less than Significant
Red Bridge State Wayside	5.2 mi NE (no decrease from approved Project)	1,2	В	Cult	T; S	LT	Low	Low	Low	Low	NA	CE	Less than Significant
Succor Creek SNA	3.5 mi NE (no decrease from approved Project)	3	Α	Nat App	T; S	LT	Low	Low	Low	Low	NA	PE	Less than Significant
	<del>)</del>		d is		Stat	e Natu	ral Areas				•		

	Area analysis)		200704	T 1: Ba aracteri		Pa	rt 2: Impa	ct Assess	ment	Part 3:	Signific	cance De	termination
Protected Area by Jurisdiction (Map ID) <sup>1</sup> (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analys	Map Sheet Reference	Scenic Quality / Scenic Attractiveness Class	Landscape Character <sup>2</sup>	Observer Characteristics (Geometry / Exposure)³	Impact Duration <sup>4</sup>	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>5</sup>	Contribution of the Project to Impacts <sup>6</sup>	Significance Determination
Lindsay Prairie Preserve/SNHA	1.3 mi E (0.3 mi decrease from approved Project)	1	С	Cult	Т	LT	Med	Med	Low	Med	NP	CE	Less than Significant
Glass Hill Preserve/SNHA	1.6 mi W	1,2	С	Ag	T; S	LT	Med	Med	Med	Med	NP	CE	Less than Significant
		3 8	Y 93	State V	Vildlife Re	efuge o	r Manage	ment Are	as	8		λ	87
Columbia Basin – Coyote Springs Wildlife Area	12.2 mi S (no decrease from approved Project)	1	С	Urb	S	LT	High	Low	High	Low	NA	CE	Less than Significant

	a /sis)			T 1: Ba aracteri		Pa	rt 2: Impa	ct Assess	sment	Part 3:	Signific	cance De	ermination
Protected Area by Jurisdiction (Map ID) <sup>1</sup> (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	Scenic Quality / Scenic Attractiveness Class	Landscape Character <sup>2</sup>	Observer Characteristics (Geometry / Exposure) <sup>3</sup>	Impact Duration <sup>4</sup>	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>5</sup>	Contribution of the Project to Impacts <sup>6</sup>	Significance Determination
Ladd Marsh Wildlife Area/SNHA	4.5 mi NW (no decrease from approved Project)	1,2	С	Ag	T; S	LT	Med	Med	Med	Med	NP	CE	Less than Significant

Note: Please refer to Exhibit L, Attachment L-3 of the ASC for the complete, detailed visual impact assessment methodology.

<sup>&</sup>lt;sup>1</sup> Map ID = The reference label used to indicate location of scenic resources on location and viewshed maps presented in Figure 7-6 and 7-7.

<sup>&</sup>lt;sup>2</sup> Landscape Character Type: Nat App = Naturally Appearing; Cult = Cultural; Hist = Historical; Urb = Urban; Ag = Agricultural

<sup>&</sup>lt;sup>3</sup> Observer Characteristics: T= Transient; S = Stationary

<sup>&</sup>lt;sup>4</sup> Duration: LT = Long-term; ST= Short-term

<sup>&</sup>lt;sup>5</sup> Context: NP = Not Precluded; P = Precluded; NA = Not Analyzed; low intensity impact

<sup>&</sup>lt;sup>6</sup> Contribution of the Project = Indicates if impacts are caused by the proposed facility (PE = Project Effects), or the combined influence of the Project and other past or present actions (CE = Combined Effects)

# Attachment 7-3. 2022 Washington Ground Squirrel Survey Report (Confidential)

# Attachment 7-4. Pygmy Rabbit Survey Report



## **Boardman to Hemingway Transmission Line Project**

### 2022 Pygmy Rabbit Survey Report



August 2022

# 2022 Pygmy Rabbit Survey Report

# **Boardman to Hemingway Transmission Line Project**

Prepared for:



1221 West Idaho Street Boise, ID 83702

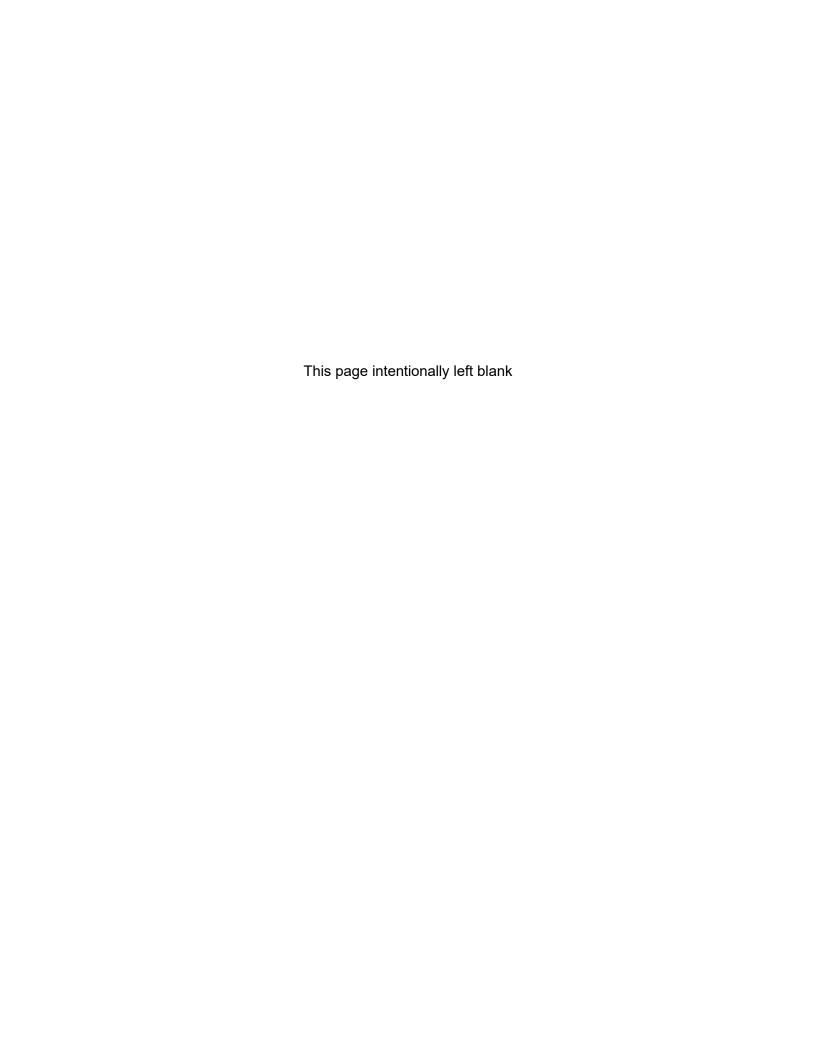
Prepared by:

# **Tetra Tech**

3380 Americana Terrace, Suite 201 Boise, ID 83706 (208) 389-1030

Tetra Tech Project No. 106-4422 4728RPT

August 2022



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### 1.0 INTRODUCTION

This report presents the methods and results of the 2022 pygmy rabbit (*Brachylagus idahoensis*) surveys. These surveys were conducted by Tetra Tech, Inc. (Tetra Tech) for Idaho Power Company's (IPC) Boardman to Hemingway Transmission Line Project (Project). The Project is a new, approximately 300-mile-long, single-circuit 500-kilovolt electric transmission line between northeast Oregon and southwest Idaho. The Project's northern terminus, the planned Longhorn Substation, is approximately 4 miles east of the City of Boardman in Morrow County, Oregon, and the southern terminus is at the Hemingway Substation located west of the city of Melba in Owyhee County, Idaho. The Project would traverse federal, state, and private lands in five counties in Oregon and one county in Idaho. The Site Boundary for the Project consists of a roughly 500-foot-wide corridor centered on the transmission line, the footprint of stations, tensioning sites, and multi-use areas, as well as buffers around access roads that vary in size depending on the type of disturbance expected. Figure 1 shows the Project location within the range of the pygmy rabbit. All figures are located at the end of this report.

Previous pygmy rabbit surveys were performed concurrently during the Terrestrial Visual Encounter Surveys (TVES) in 2011, 2012, 2013, 2014, and 2016 within the Project and its previously considered alternatives to inform permitting. Species-specific surveys were also conducted in 2019 within the geotechnical boring sites. Findings of the 2011, 2012, 2013, 2014, and 2016 surveys are presented in the TVES technical reports (Tetra Tech 2011, 2012, 2013, and 2014) and the Biological Surveys Summary Report 2010-2016 (Tetra Tech 2017). A technical report was not prepared for the 2019 findings, although no pygmy rabbits or their sign were documented at these sites.

The 2022 surveys are in support of pre-construction compliance for the Project. IPC anticipates issuance of a site certificate from the Oregon Department of Energy's (ODOE) Energy Facility Siting Council (EFSC) in September of 2022. These surveys are necessary to comply with the recommended site certificate conditions included in the Proposed Order (ODOE 2020), which are expected to be included as-is in the site certificate. The recommended site certificate condition applicable to pygmy rabbits includes:

### PRE-FW-04, Fish and Wildlife Condition 16:

Prior to construction of a phase or segment of the facility, the certificate holder shall conduct, as applicable, the following biological surveys on all portions of the site boundary, regardless of whether those portions have been surveyed at the time of issuance of the site certificate, based on the survey protocols included in ASC Exhibit P Attachment P1-2 Revised Final Biological Survey Work Plan, unless otherwise approved by the Department in consultation with ODFW:

- a. Washington ground squirrels;
- b. Raptor nests;
- c. Pygmy rabbits;
- d. State Sensitive bat species;
- e. State-listed Threatened and Endangered plants
- f. Greater sage-grouse, as necessary for the State of Oregon to calculate the amount of sage-grouse habitat compensatory mitigation required for the facility using Oregon's Sage-Grouse Habitat Quantification Tool.

### 2.0 METHODS

The 2022 surveys follow the methods implemented during the Project's previous pygmy rabbit surveys and as described in Exhibit P1, Attachment P1-2 of the Application for Site Certificate to EFSC. The protocol was approved by the Oregon Department of Fish and Wildlife (ODFW) prior to commencing previous years' surveys.

## 2.1 Survey Area

The pygmy rabbit historical range includes portions of Washington, Oregon, Idaho, Montana, Wyoming, California, Nevada, and Utah. They can still be found in parts of these states, although their range has been greatly reduced. Currently, pygmy rabbits are found in several eastern Oregon counties and 26 counties in Idaho (ODFW 2022; IDFG 2022). The species' range extends through portions of Owyhee County, Idaho, and Malheur and Baker counties in Oregon within the Project.

In the well-known publication, Surveying for Pygmy Rabbits (Ulmschneider et al. 2008), common pygmy rabbit habitat is described as dense stands of big sagebrush (Artemisia tridentata) growing in deep loose soils. Burrows are usually found in the taller and denser big sagebrush in an area, with the height of the sagebrush varying from about 1 ½ to 7 feet. Regardless of the absolute height of the vegetation, the rabbits will almost always burrow in the tallest and densest sagebrush on the landscape. Density can also vary, but commonly the sagebrush is so dense right at the burrow entrance that it is difficult to walk through (greater than 30 percent cover). Various subspecies of sagebrush (Artemisia tridentate) are used, including Wyoming (A. t. wyomingensis), mountain (A. t. vaseyana), and Great Basin (A. t. tridentata). Other shrub species may also be present, including bitterbrush (*Purshia tridentata*), rabbitbrush (Chrysothamnus spp.), greasewood (Sarcobatus vermiculatus), snowberry (Symphoricarpos spp.), and juniper (Juniperus spp.). Pygmy rabbits are found in alluvial fans. swales in a rolling landscape, large flat valleys, at the foot of mountains, along creek and drainage bottoms, in mountain basins, or other landscape features where soil may have accumulated to greater depths. They generally inhabit flatter ground, sometimes on moderate slopes, and not found on steep ground. Generally, pygmy rabbits burrow in loamy soils deeper than 20 inches. Soil composition needs to be able to support a burrow system with numerous entrances, but also must be soft enough for digging (Ulmschneider et al. 2008). Clay can also be a small part of the soil composition. A habitat model from the University of Idaho used a clay content of 13 to 30 percent (Rachlow and Svancara 2003), while another habitat model from Idaho State University used a clay content of less than 13.5 percent (Simons and Laundre 2001).

Prior to commencing surveys, Tetra Tech conducted a desktop analysis to determine the pygmy rabbit survey area based on habitat suitability and the species' range. Potentially suitable habitat for pygmy rabbits was based on the LANDFIRE vegetation types (USGS 2016) with a potential big sagebrush component and then overlaid with STATSGO soils 60 centimeters or greater in depth (NRCS 2005). Although pygmy rabbits are most commonly found in big sagebrush habitats with greater than 30 percent cover, the Bureau of Land Management (BLM) has advised Tetra Tech that pygmy rabbits can be found in sagebrush habitats with as little as 5 percent cover. Therefore, only areas previously field surveyed within the Site Boundary that had less than 5 percent sagebrush cover were removed from the survey area.

The 2022 pygmy rabbit survey area consisted of approximately 2,758 acres, beginning at milepost 138.75 in Baker County, Oregon, and running southeast for approximately 138 miles in and out of potentially suitable habitat, to milepost 277.1 in Owyhee County, Idaho. The survey

area was located mostly on private lands but also included approximately 980 acres of federal lands (968 acres BLM-managed land and 12 acres Bureau of Reclamation–managed land).

# 2.2 Survey Schedule

Surveys for pygmy rabbits can be conducted yearlong, although seasonal variations in burrow use and pellets should be considered. Pellets can be scarce at burrows in late summer and early fall, possibly due to less activity at these sites during this time of year. During the spring, pygmy rabbits appear to be active at burrows but pellets from pregnant females can be similar in size to those of cottontails, making the identification more challenging. Surveying for pygmy rabbits during the winter after a light snow is the optimal time for surveys because fresh tracks and pellets are noticeable. Pygmy rabbits also clean out burrow entrances after a snow, which helps identify occupied burrows. Although winter can be an optimal time for identifying pygmy rabbit sign, it can also be the most difficult time to survey due to driving access restrictions into an area due to snow or mud. In 2022, surveys were conducted from early March through April.

## 2.3 Field Survey Methods

Survey methods were adapted from "Surveying for Pygmy Rabbits (*Brachylagus idahoensis*)" developed by the Interagency Pygmy Rabbit Working Group (Ulmschneider et al. 2008) and "Pygmy Rabbit Surveys on State Lands in Oregon" developed by the U.S. Geological Survey (Hagar and Lienkaemper 2007).

Tetra Tech reached out to the BLM to determine the location of a known pygmy rabbit colony to visit prior to field surveys. Known colonies were not accessible in March; consequently, bagged samples of pygmy rabbit, cottontail (*Sylvilagus* spp.), and jackrabbit (*Lepus* spp.) pellets and photos of burrows, sign, and rabbits were used for training survey crew members prior to field surveys (Appendix A). Two of the four crew members had previously surveyed for the pygmy rabbits and documented the species and their occupied burrows.

To conduct the surveys, four surveyors walked meandering transects together spaced approximately 100 feet apart throughout most of the mapped potential pygmy rabbit habitat, with more focus and time spent in areas of taller, denser big sagebrush. This close spacing allowed each surveyor to scan approximately 50 feet to either side searching for pygmy rabbit individuals, burrows, and pellets. When the four surveyors were surveying the 500-foot-wide route corridor, transect spacing was 100 feet (50 feet on either side), when one surveyor needed to temporarily leave the route corridor to survey a section of proposed or existing road corridor, the transect spacing temporarily expanded so each surveyor was surveying approximately 83 to 100 feet on either side (depending on width extent of Project feature). During the times of expanded transect spacing, all surveyors slowed down and meandered more extensively to better cover those limited areas of the survey area.

# 2.4 Recording Data

If a burrow was detected, that location was flagged and the surrounding area out to approximately 30 feet was intensively searched for additional burrows and sign to determine the extent of that burrow complex. The boundary of that burrow complex, incorporating the outermost associated shrub or cluster of shrubs, was delineated using Global Positioning System (GPS) equipped tablets. A rule of thumb was to record a new burrow complex if it was spaced more than 30 feet from the originally detected burrow complex.

At each burrow complex, the surveyor(s) collected a GPS point, took photographs of burrows and sign (i.e., pellets/scat), and filled out a datasheet that included the date, surveyor name(s),

soil type, number of individuals seen, quantity and age of pellets (fresh – brown, green, or black scat vs. old – grey dried scat), percentage of vegetation canopy cover, number of burrow entrances, and details about the burrow complex (Appendix B). If pygmy rabbit pellets were observed, samples were collected in a zip lock bag with a silica pouch and labeled with the date and location.

General GPS points and photographs were collected to document the general suitability of the habitat for pygmy rabbits. In addition, any special status wildlife species encountered during the pygmy rabbit surveys were recorded with a GPS point. Field data were regularly checked on laptop computers through ArcGIS Online for accuracy and completeness.

### 3.0 RESULTS

Surveys for pygmy rabbits were conducted between March 7-10 and April 18-24, 2022. Most of the survey area was surveyed, completing surveys for approximately 2,632 acres (approximately 95 percent of the total survey area). Areas that were not surveyed in Baker County, Oregon, due to denied right-of-entry from landowners at the time of surveys totaled approximately 126 acres (approximately 5 percent; Figure 1).

Tetra Tech did not document any evidence of pygmy rabbits within the survey area during the 2022 surveys. Five hundred and seventy-three GPS points and photos were collected to show the varied habitat suitability within the survey area (see select photos in Appendix C). Some areas were rocky and many areas were sparsely covered with sagebrush making them much less likely to be used by pygmy rabbits. General habitat suitability category points were used in Figure 1 (Habitat, Poor Habitat, and Not Habitat). "Poor Habitat" included rocky soils and very sparse sagebrush coverage, and "Not Habitat" included areas with no sagebrush species present, grasslands, pasturelands, agriculture, burned areas, developed land, and extensively rocky terrain.

Special status wildlife species recorded incidentally during the pygmy rabbit surveys included 10 long-billed curlew (*Numenius americanus*), 14 Brewer's sparrow (*Spizella breweri breweri*), 2 Swainson's hawk (*Buteo swainsoni*), and 1 burrowing owl (*Athene cunicularia hypugaea*). The burrowing owl flushed from a possible active burrow with whitewash and pellets near milepost 196.6.

### 4.0 CONCLUSIONS

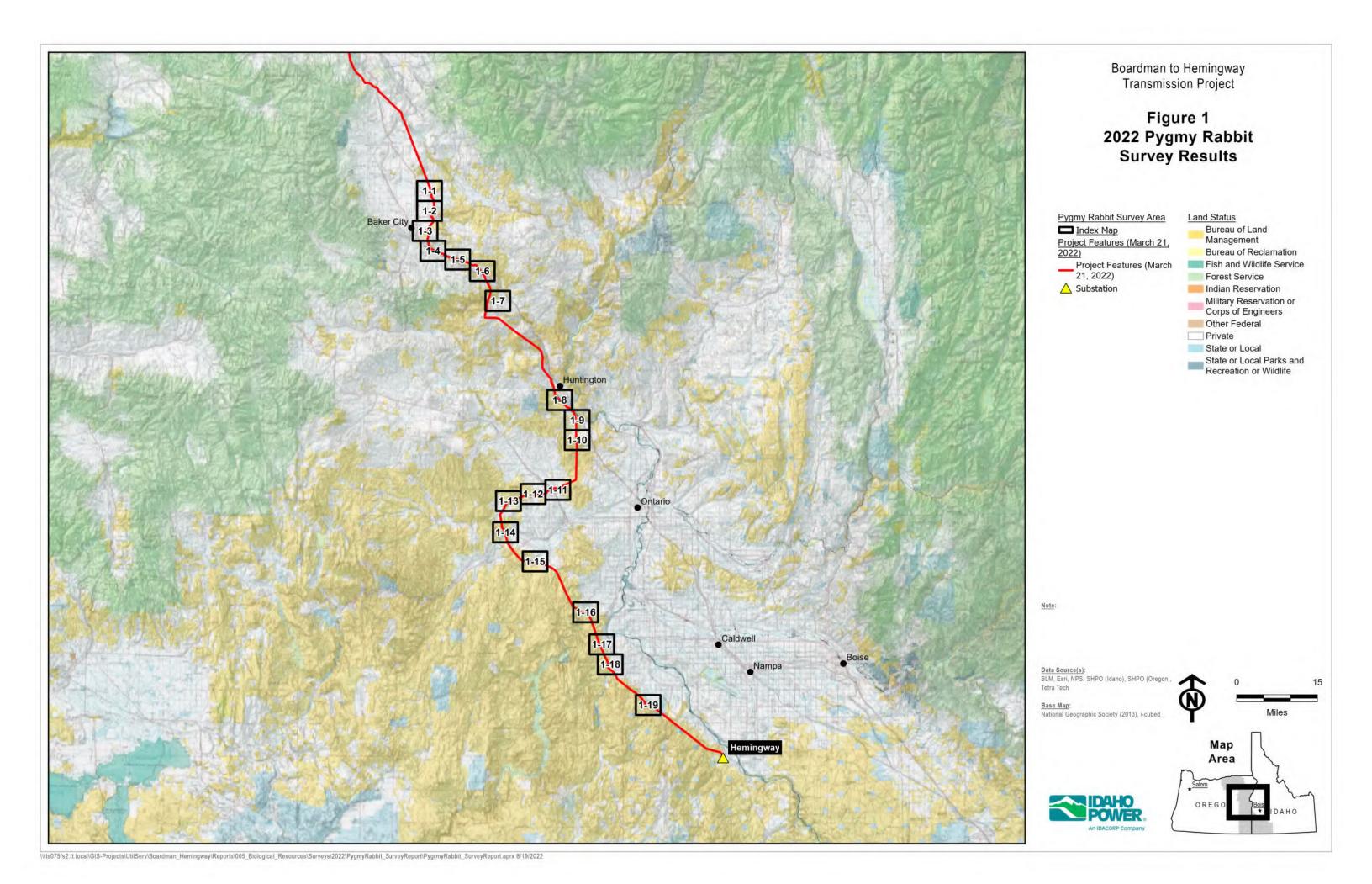
The 2022 pygmy rabbit surveys serve as pre-construction surveys for the Project in compliance with the recommended Fish and Wildlife Condition 16 in PRE-FW-04. For the 126 acres of land not surveyed due to previous access restrictions, surveys on those parcels should be completed prior to construction. In addition, any changes to the Site Boundary after the surveys were conducted within potential pygmy rabbit habitat should also be surveyed for pygmy rabbits prior to construction.

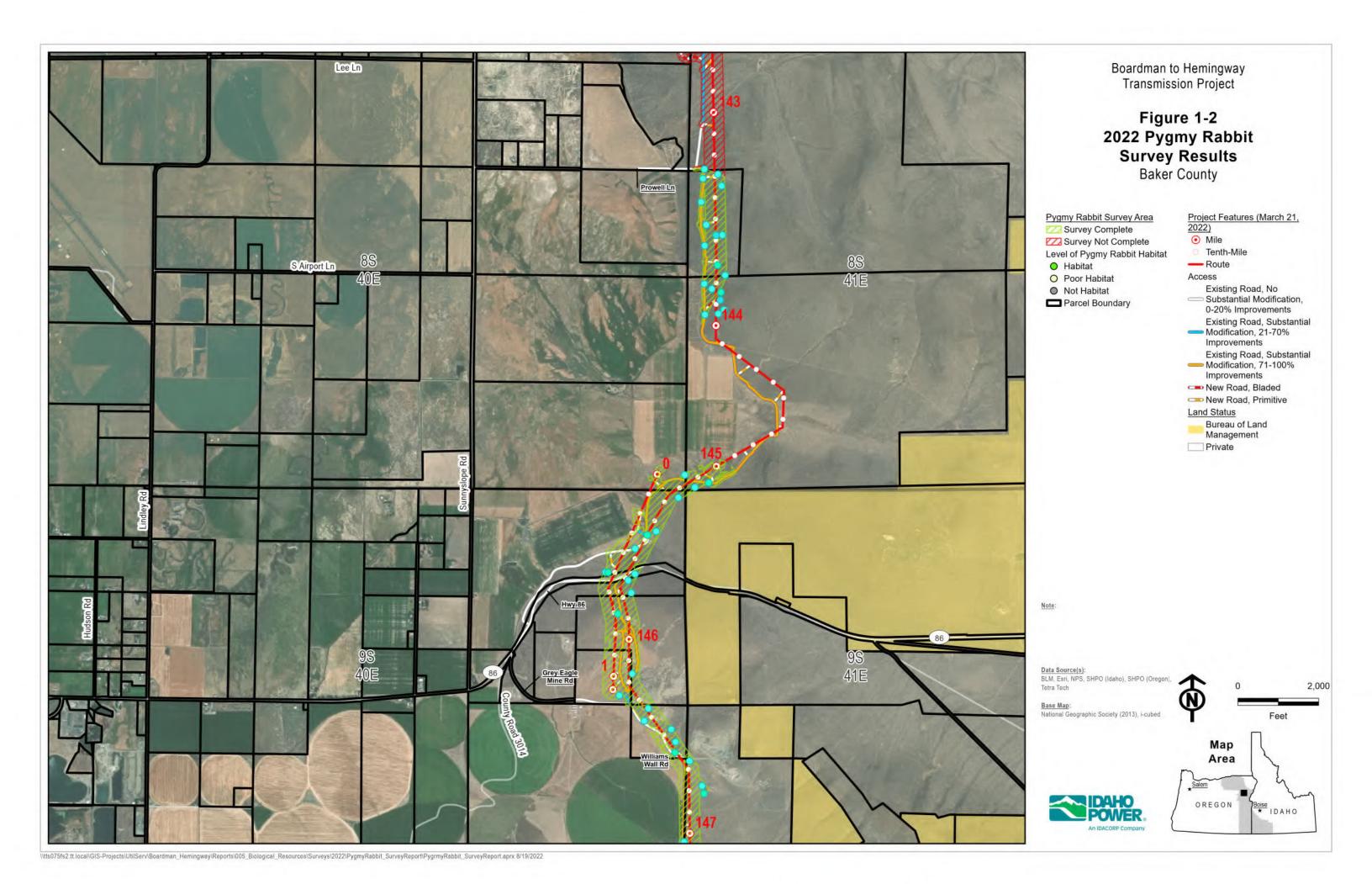
### 5.0 REFERENCES

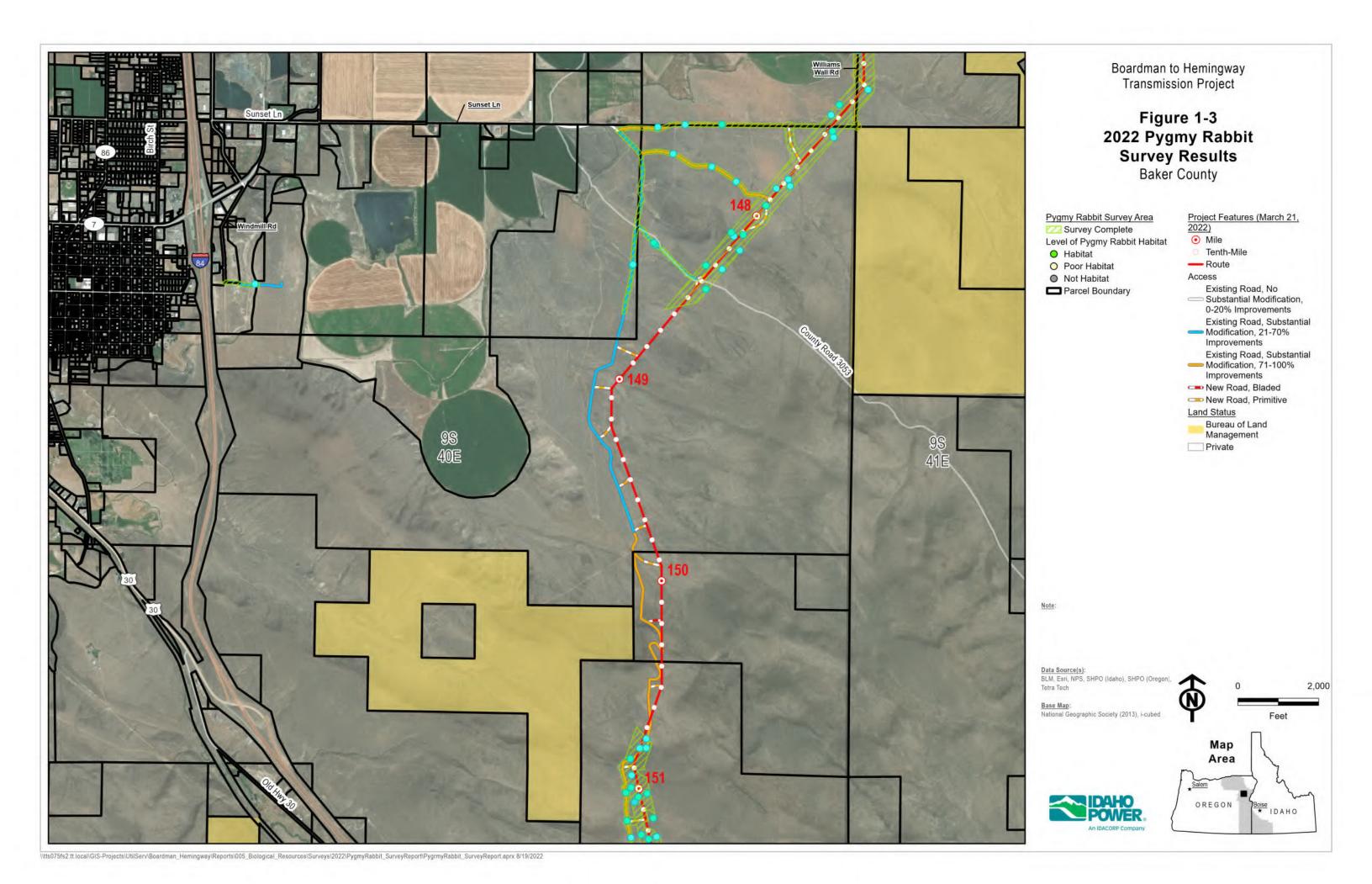
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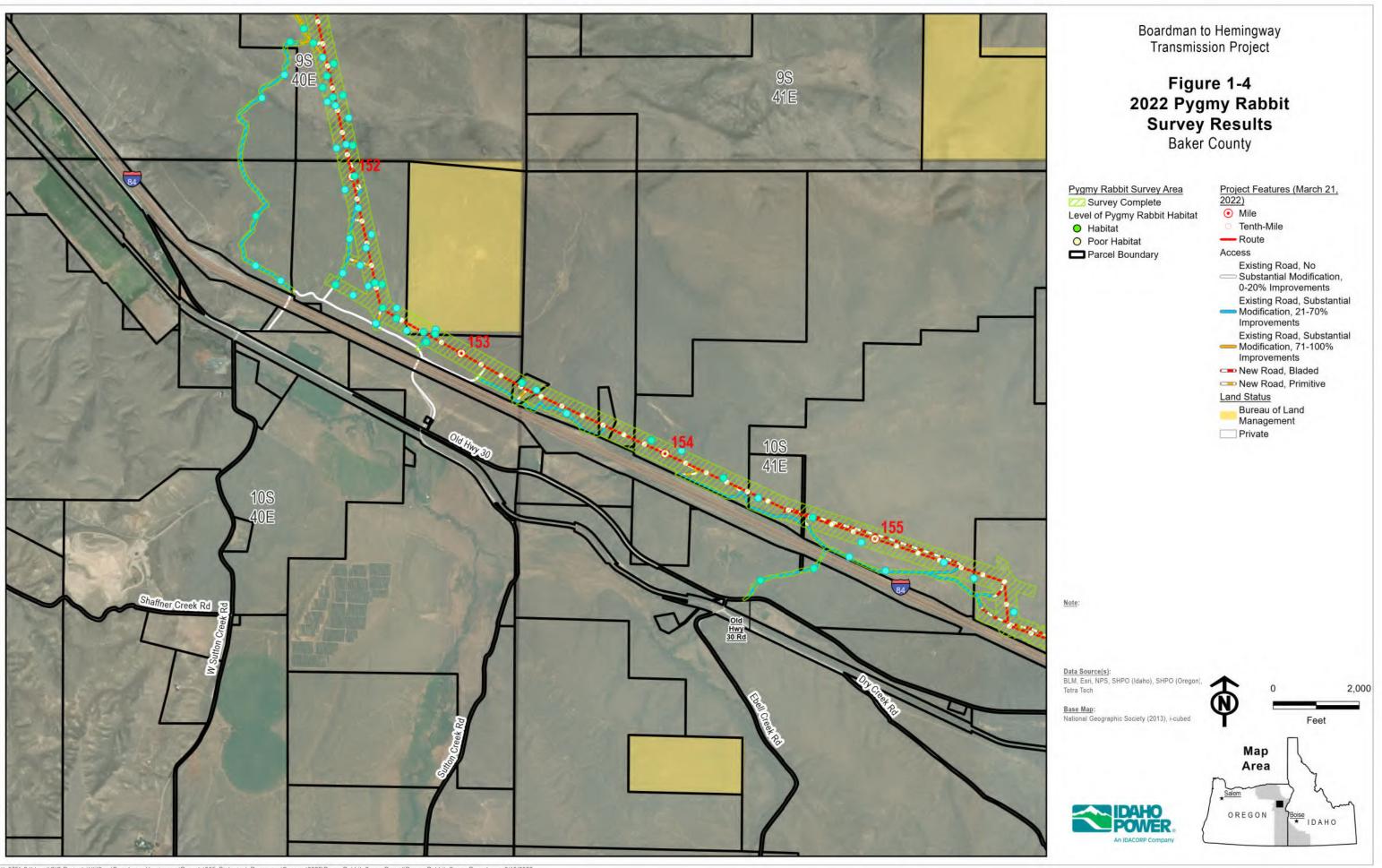
Boardman to Hemingway Transmission Line

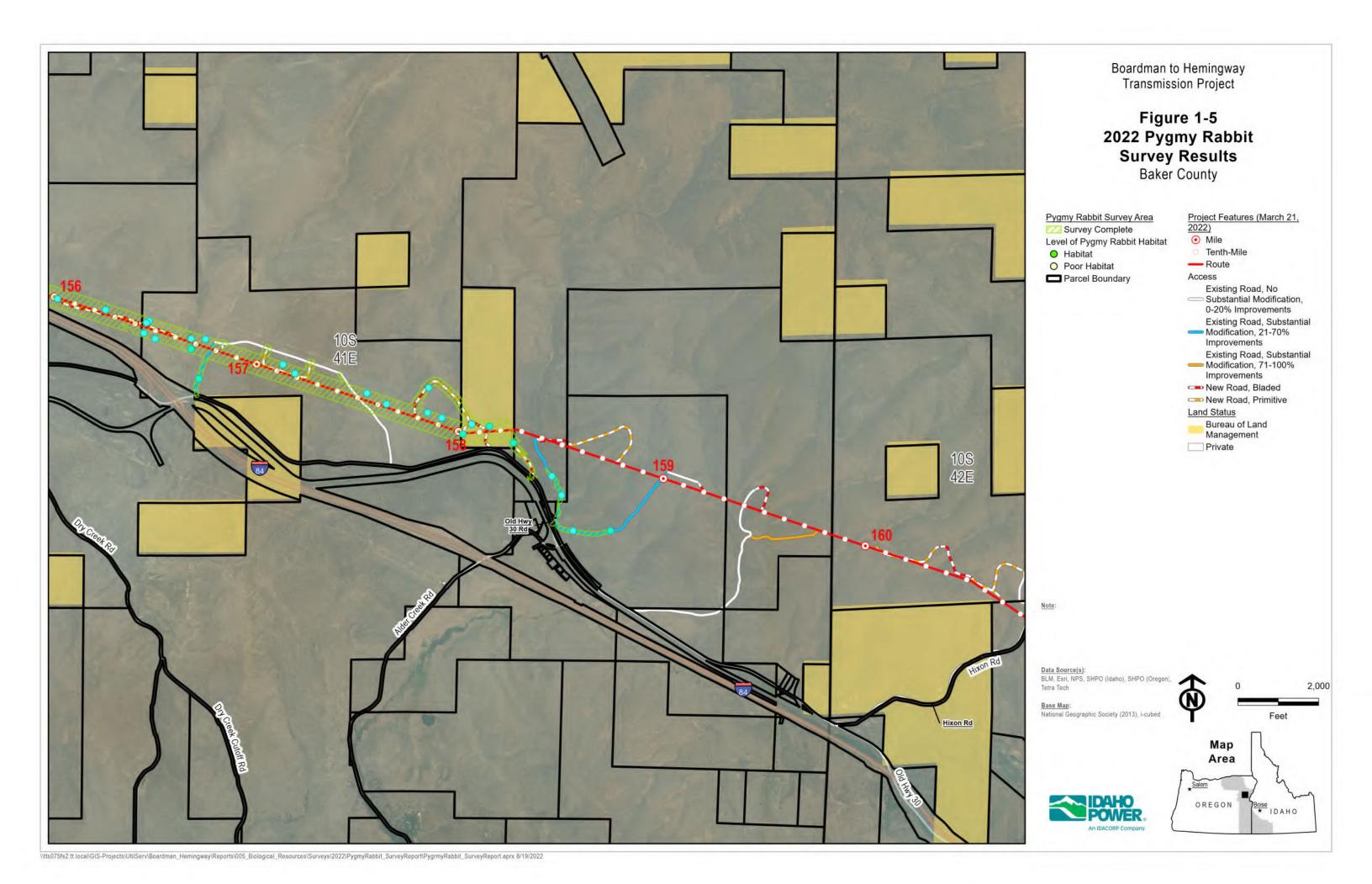
# **FIGURES**

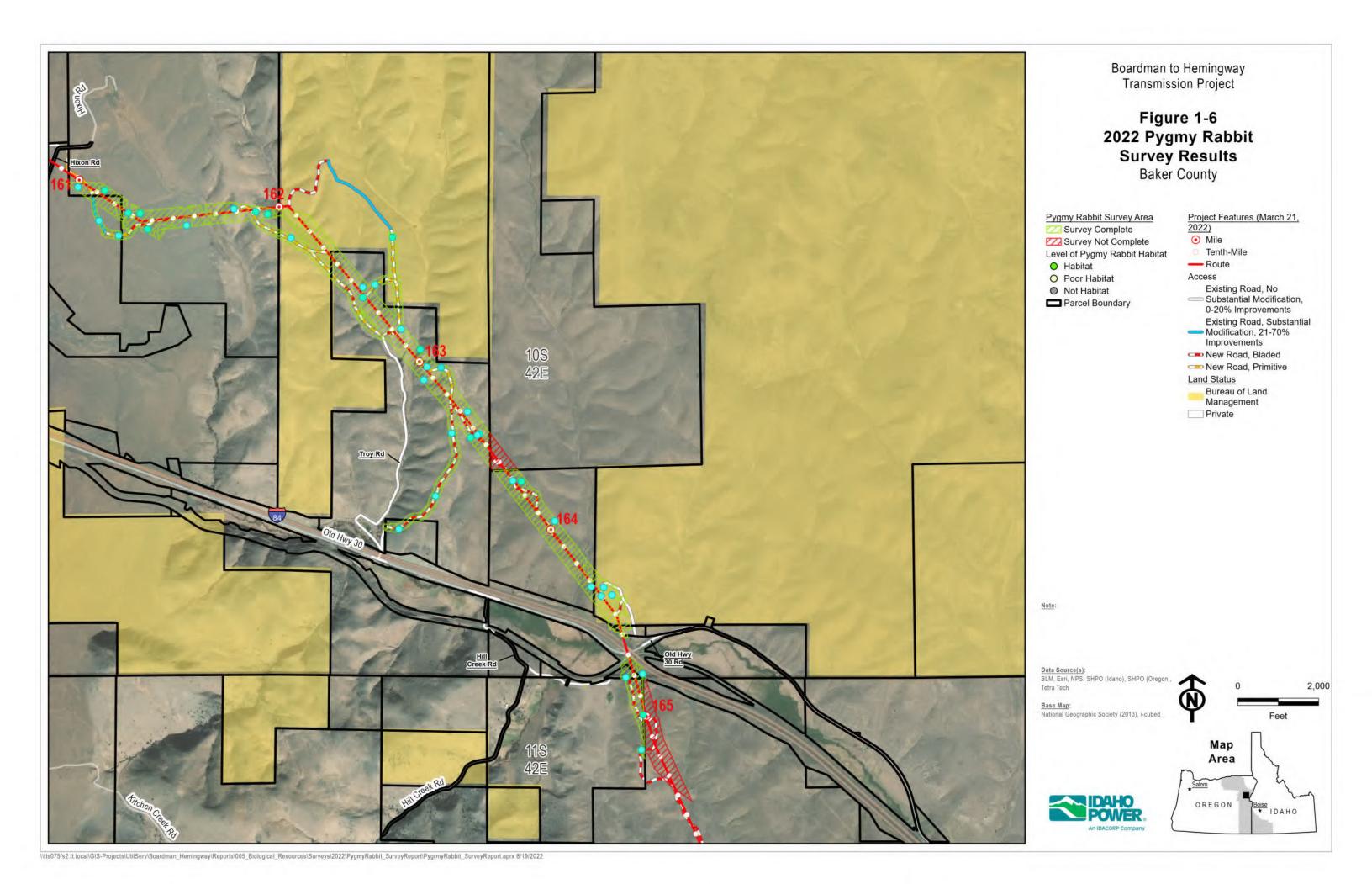


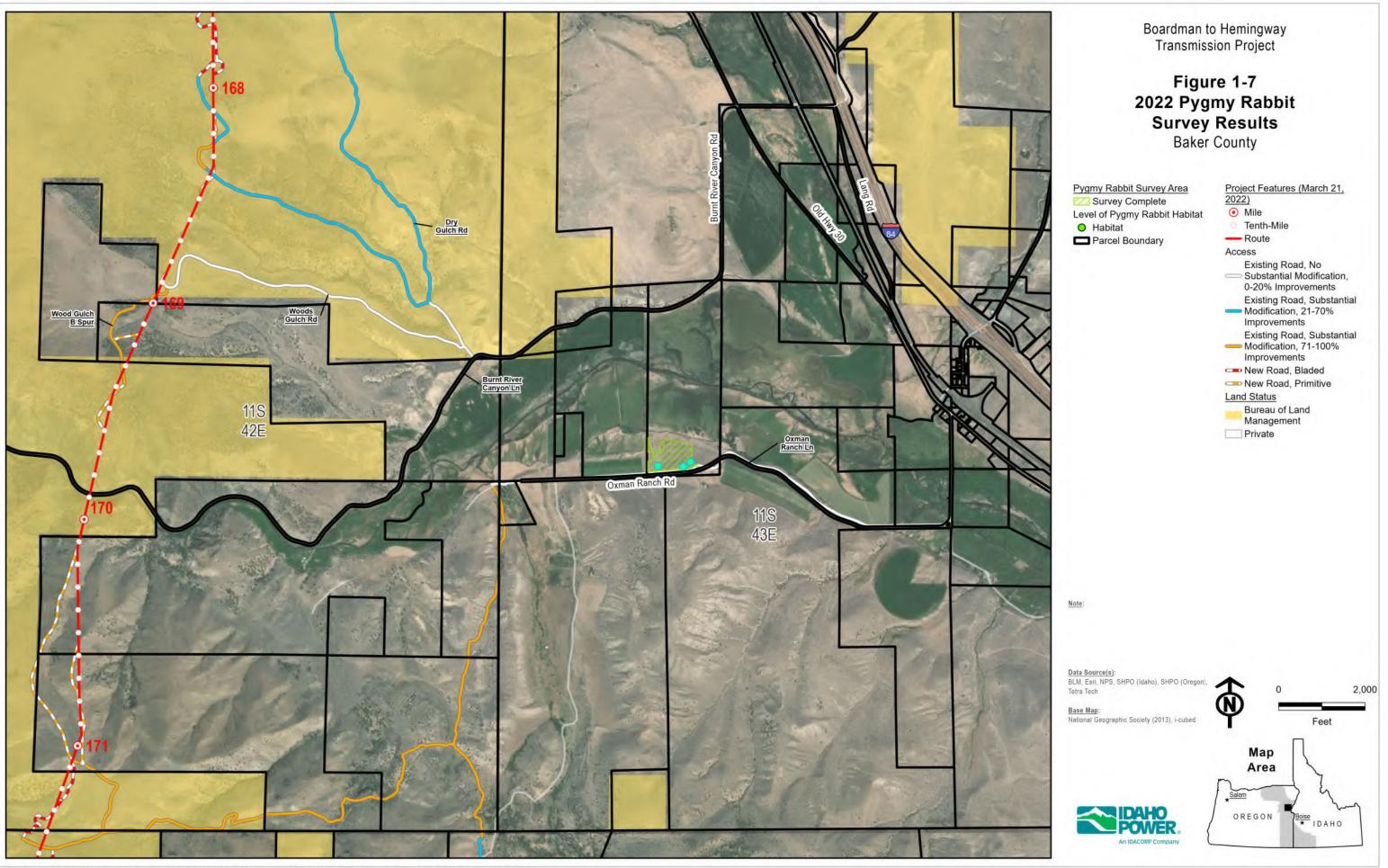


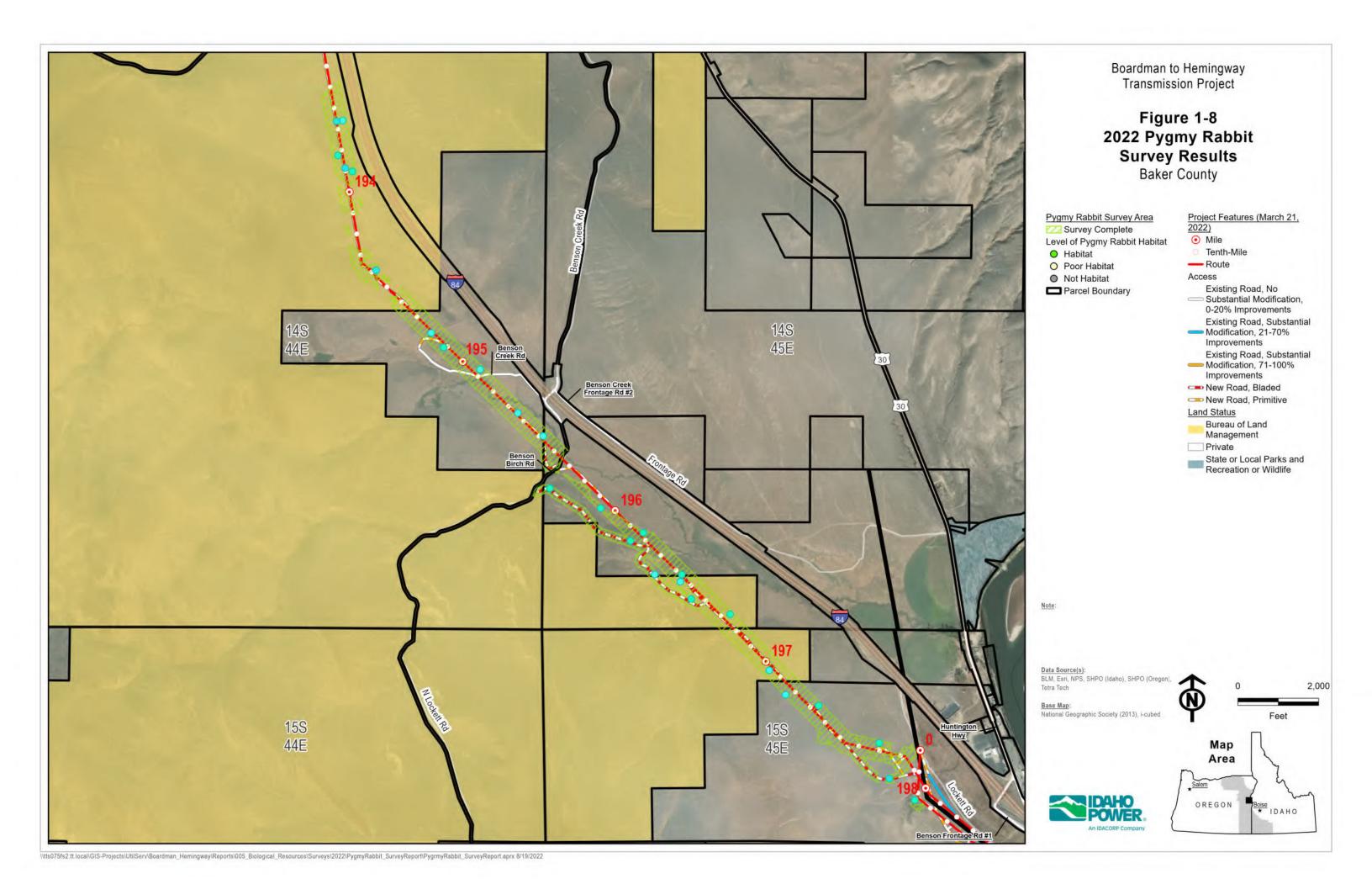


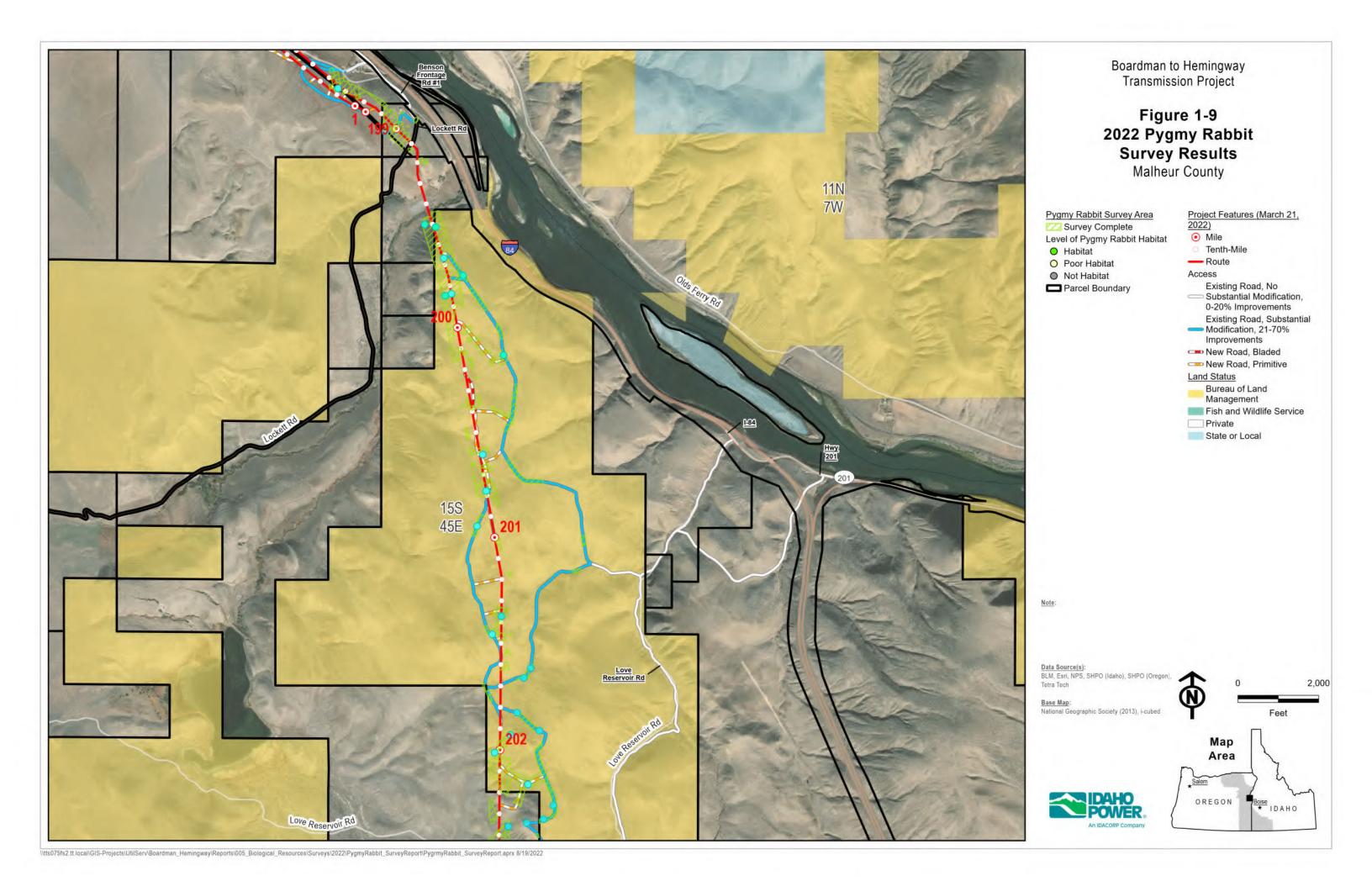


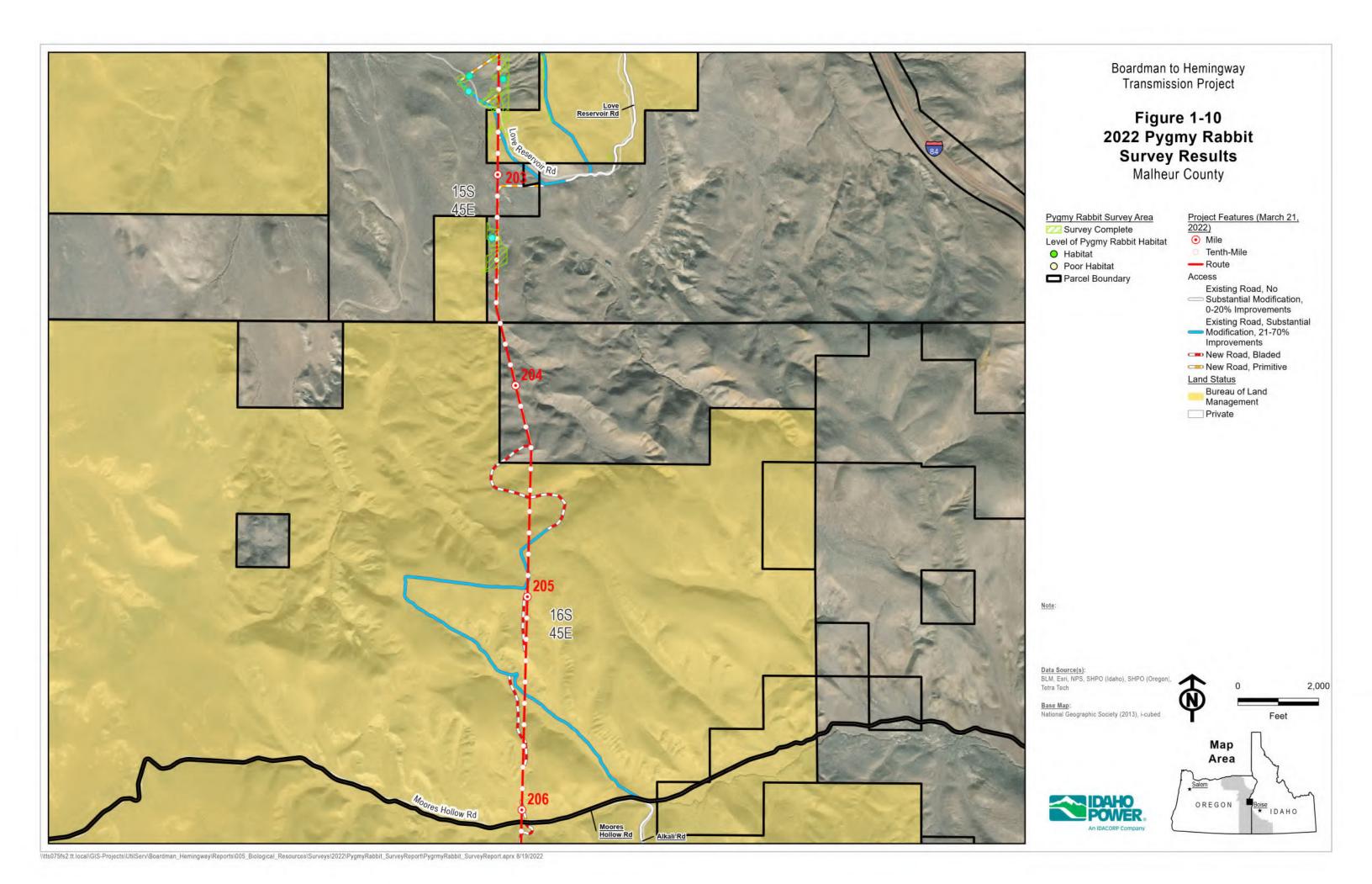


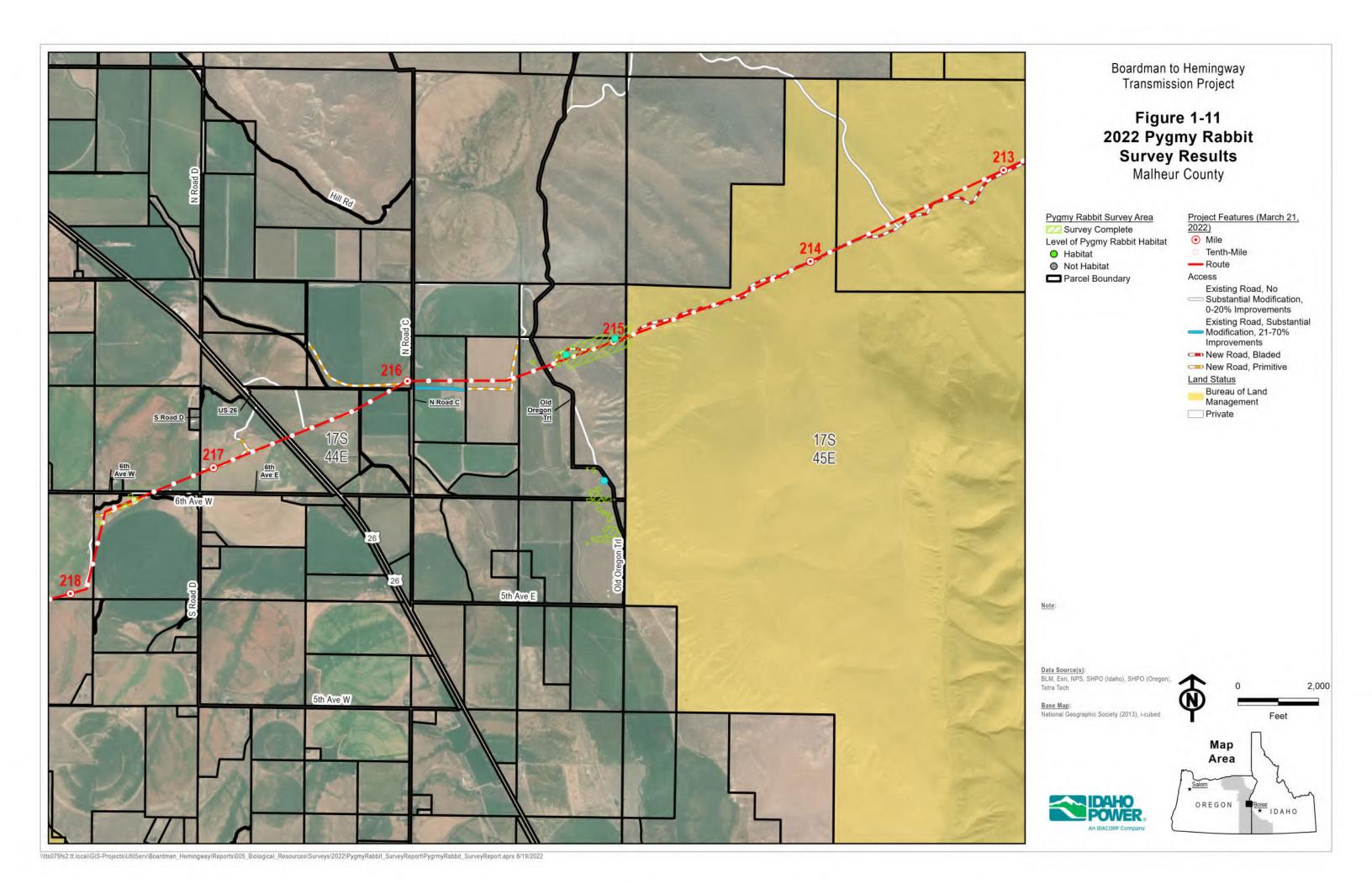


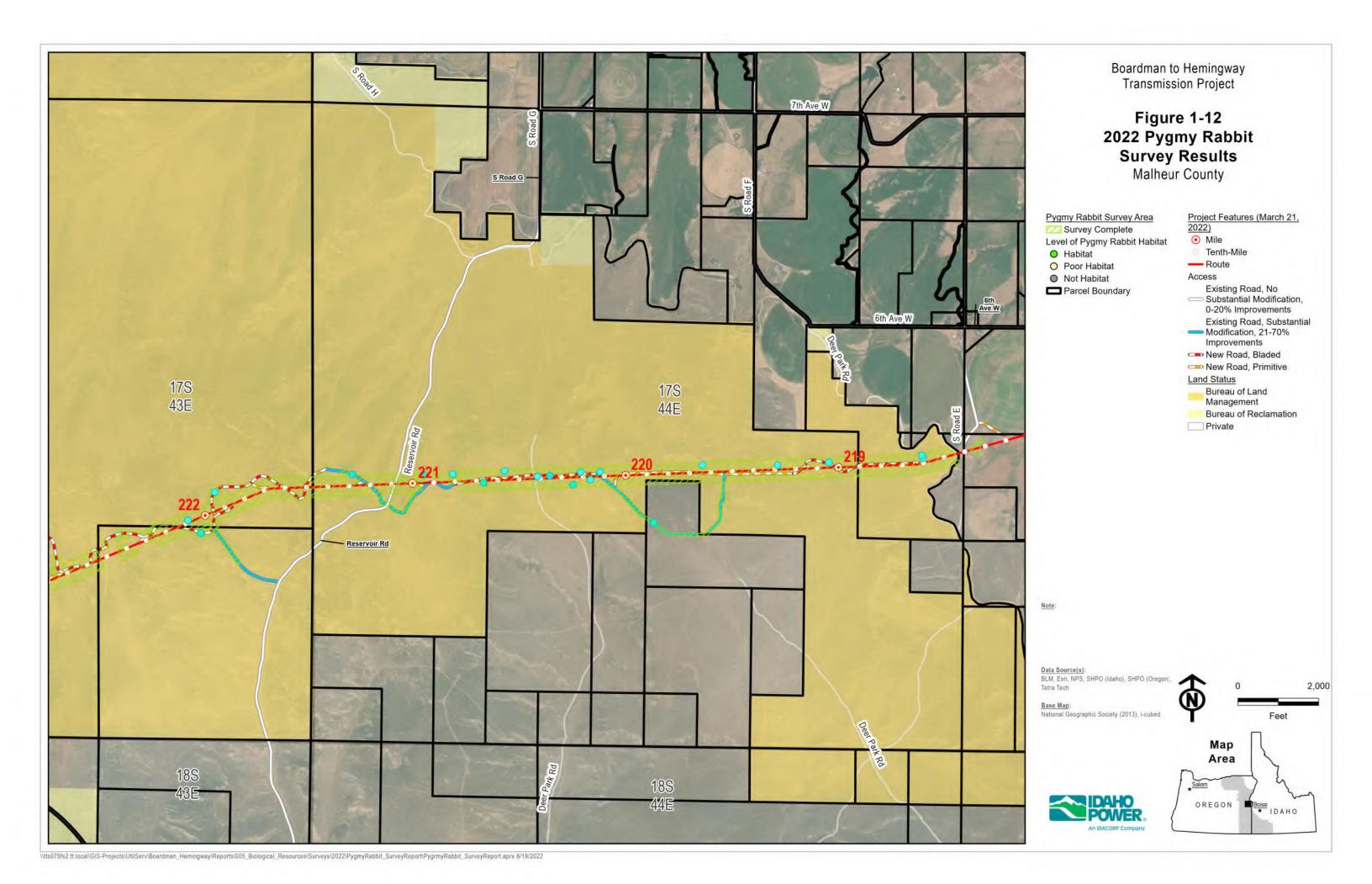


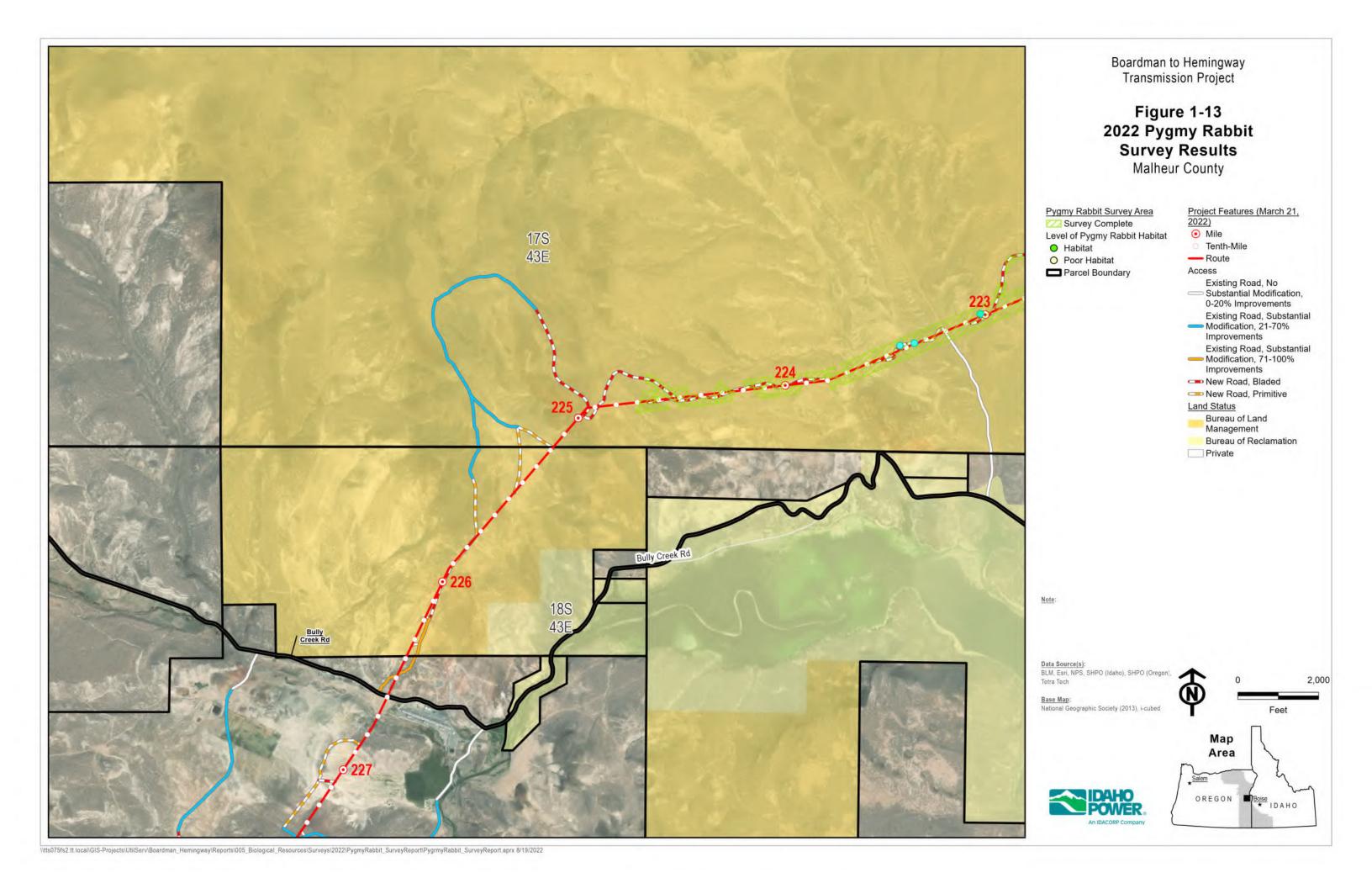


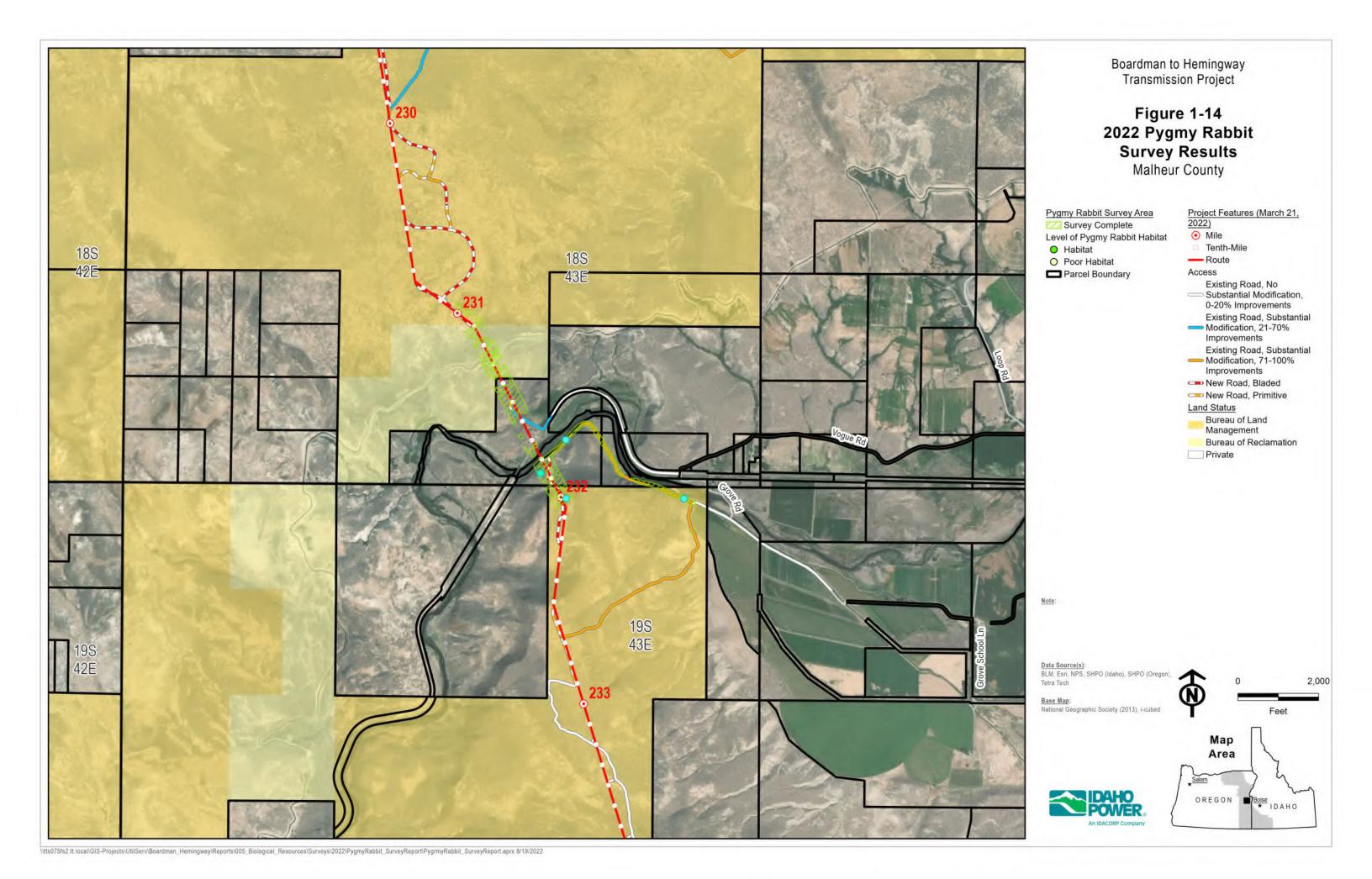


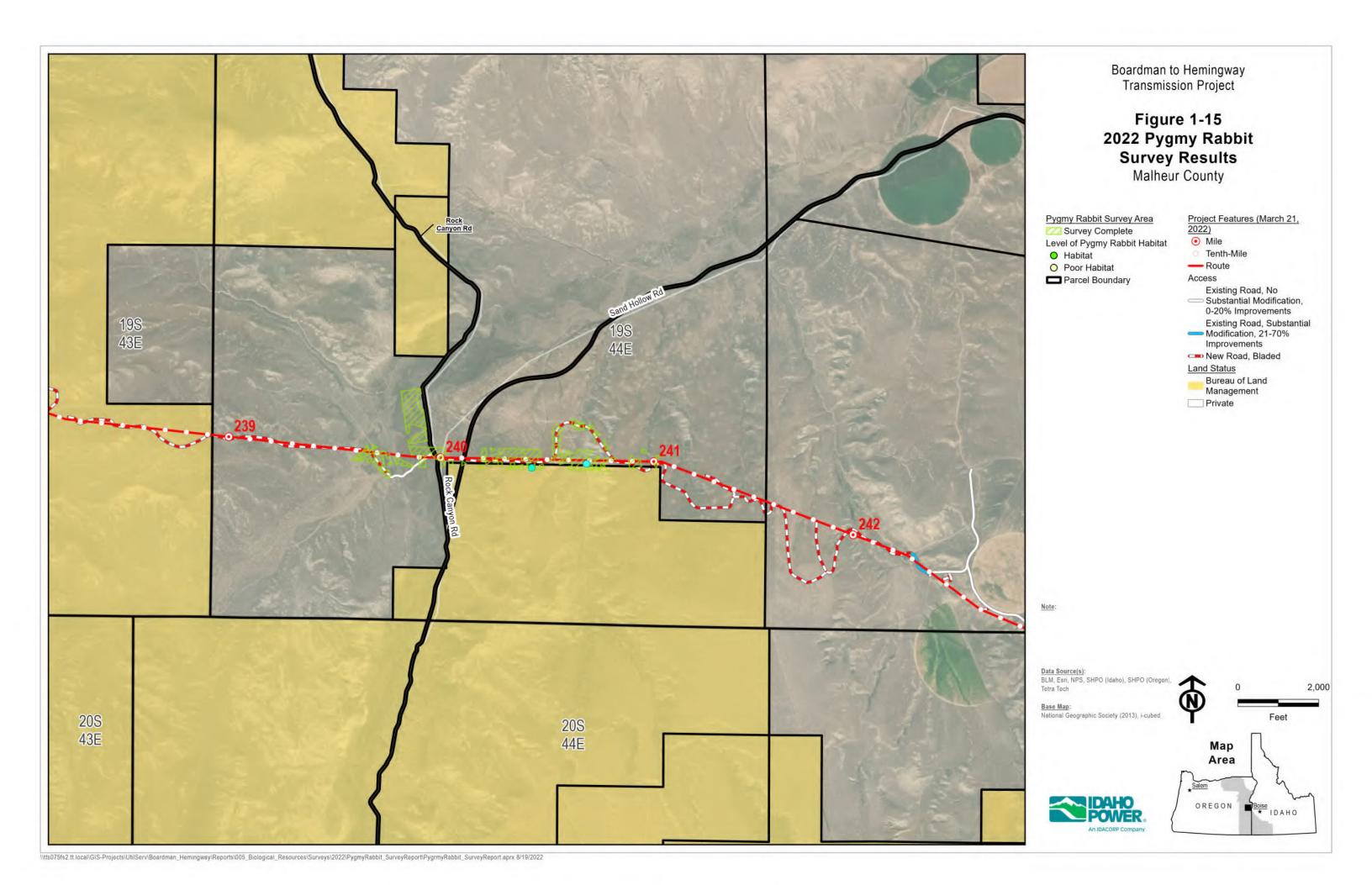


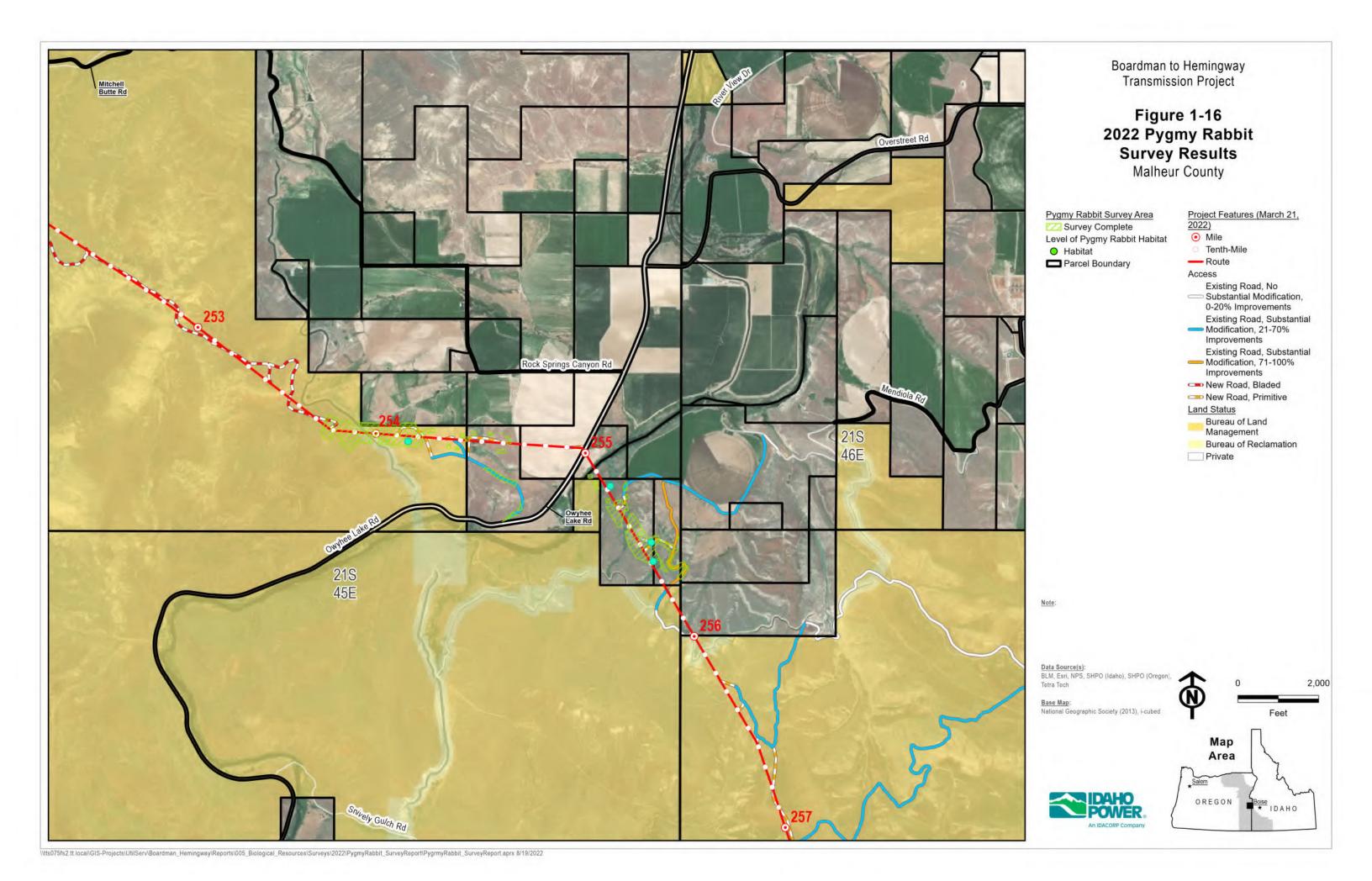


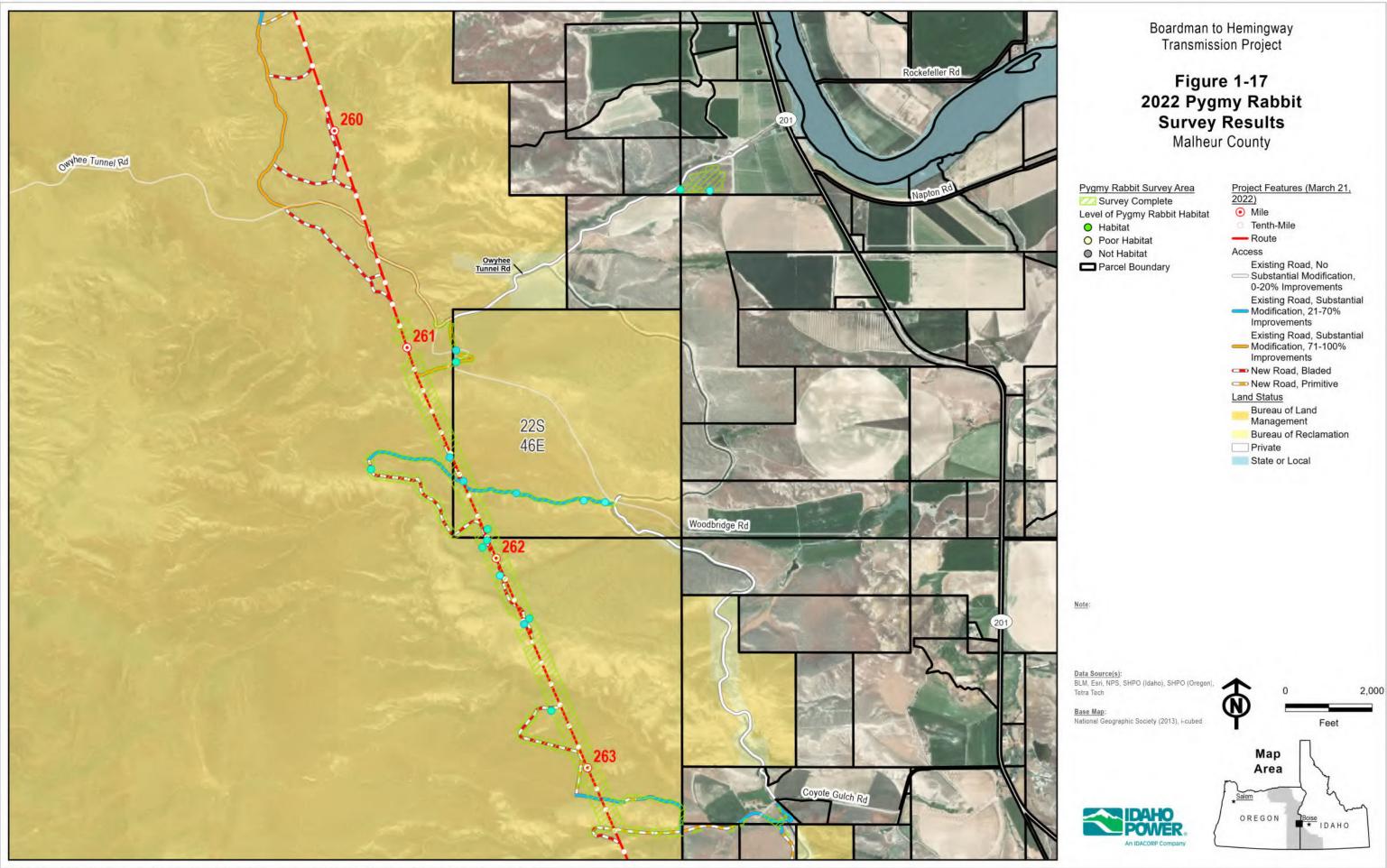


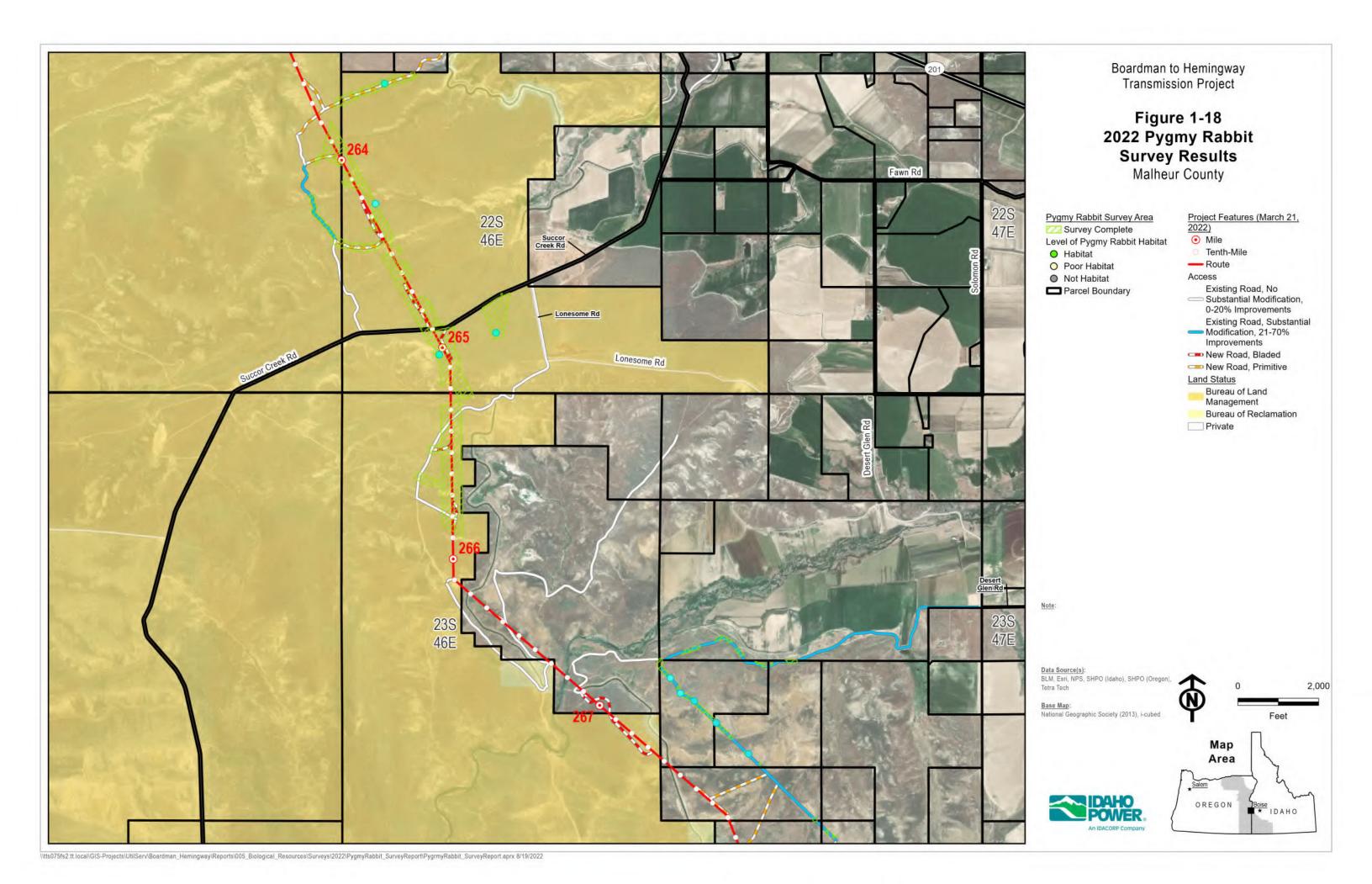


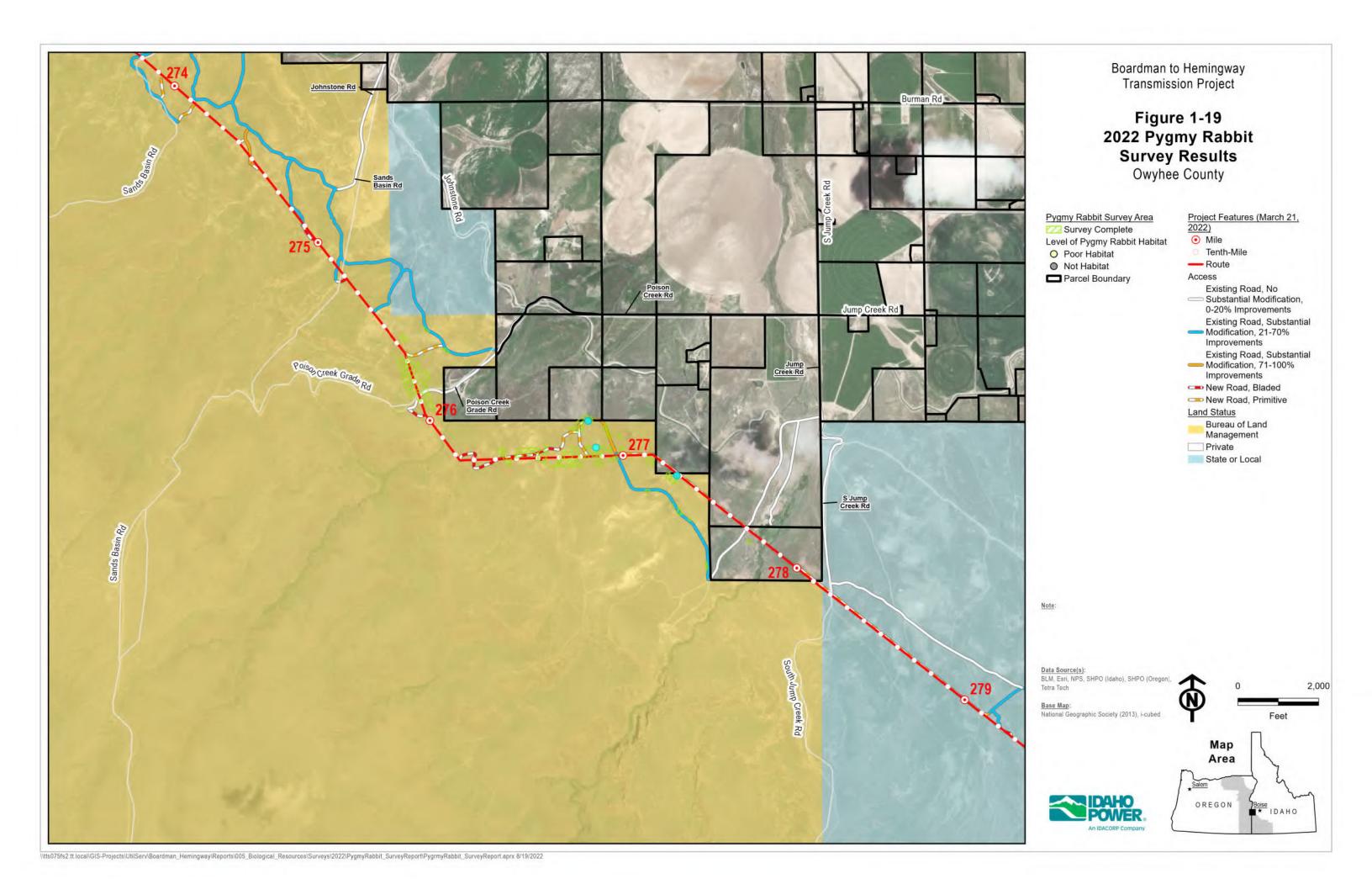












# APPENDIX A PYGMY RABBIT IDENTIFICATION GUIDES

# SPECIES INFO AND IDENTIFICATION INFO

### Pygmy Rabbits (Brachylagus idahoensis)

Source: Lindsey Rush (BLM Burley Field Office)

#### **Identification**

Length: 23-29 cm (9-11 in)
Weight: 400-500 g (0.9-1.1 lbs)

• Ear length (notch to tip): 55-64 mm (2.2-2.5 in)

• Tail: small, inconspicuous, color of body

• Rufus color on nape, back of ears, and on feet

Relatively short and rounded ears

• White or buff belly, noticeable in winter pelage

**Note**: Cottontails are larger, with longer ears and a visible white tail.









### Burrow systems

Pygmy rabbits excavate and use burrow systems with multiple entrances. Burrow entrances are often small in diameter (4-7in), but pygmy rabbits also use much larger burrows created by other species. Burrow systems are typically located at base of relatively dense sagebrush shrubs.

### **Pellets**

Small pellets are usually abundant around pygmy rabbit burrow systems. Appearance and size of pellets vary over the annual cycle. In summer, pellets from adult pygmy rabbits may overlap in size with those of juvenile cottontails. See attached sheet of pellet photos and descriptions.



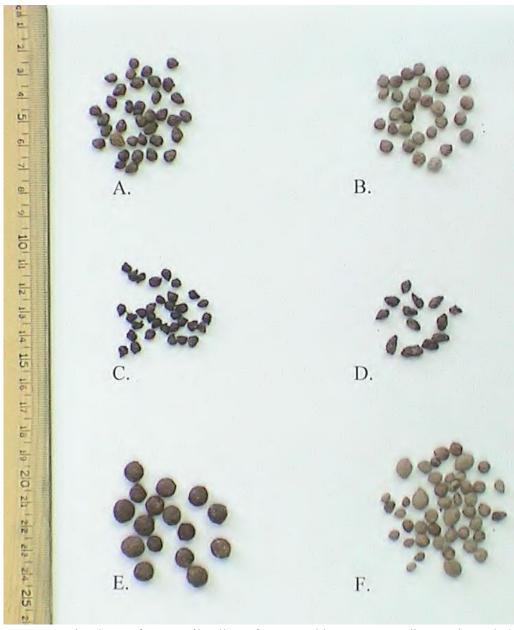
### Tracks & other sign

Burrow systems of pygmy rabbits are often surrounded by runways that can be readily observed in the snow. These runways are present but less visible when snow is absent. During summer, dust baths are sometimes common near active burrow systems.





# Pellets of pygmy rabbits (A-D and F) and mountain cottontail rabbits (E).



- A. Pygmy rabbit pellets collected fresh in August. Color = dark olive green.
- B. Pygmy rabbit pellets exhibiting the "usual" shape collected in May. The size is relatively uniform and slightly large; these may be from a reproductive female. Pellets from males have a similar shape and appear slightly smaller. Color = tan.
- C. Pellets from a juvenile pygmy rabbit collected in May. The fresh pellets were soft and dark brown on the surface with a green interior. They dried to a smaller, less regular shape. Color = dark brown.
- D. Pellets from a lactating female. Pellets were similar in appearance to fresh juvenile pellets (soft, dark brown exterior with green interior). They desiccated to irregular shapes with a pronounced point on one end. Color = dark olive green.
- E. Pellets from a cottontail rabbit. Size is relatively uniform and larger than pygmy rabbit pellets.

The shape of cottontail pellets often resemble M & M candies. Color = dark brown but older ones will be tan or gray.

F. A range of pygmy rabbit pellets collected from a burrow system that appeared to have been occupied for a long period. The area was carpeted with pellets exhibiting variation in size, shape, and color.

# CONDUCTING PYGMY RABBIT SURVEYS

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## **Pygmy Rabbits**



Pygmy rabbits are small rabbits with no white on their tail, and rufous coloring on the back of their neck, legs and ventral side. Their ears are slightly more round and small in size and have a little more hair in them than cottontails.

\*These photo comparisons between pygmy rabbits and cottontails are from the same trail camera to show size difference\*

## **Cottontail Rabbits**



Cottontail rabbits have a white tail and mustache. Their ears are larger, pointier and less harry than Pygmy rabbits.

# **Looking for burrows:**

Pygmy rabbits are one of two rabbits that excavate their own burrows.

<u>Habitat</u>: They have two main habitat requirements: Tall dense sagebrush and specific soil requirements. Pygmy rabbits prefer loamy soils 20" deep, sturdy enough to support a burrow system, but soft enough for digging. Pay attention to "Mima mounds' which are areas mounded in topography, and sagebrush tends to be taller. Also check out "sagebrush islands" where tall sagebrush is intermingled with shorter sagebrush.

<u>Burrows</u>: Range in size from 4-10". Burrows tend to be placed at the base of a sagebrush or under a boulder. Multiple entrances are common (1-12). There tends to be a large pile of dirt where rabbits have excavated a burrow. Near highly active burrows there may be what is called a "carpet" this is where a lot of scat could be found in a highly concentrated area. An active burrow will be neat and clean with fresh dirt and scat. After a lot of rain and wind burrows can look inactive after 2 weeks, but rabbits will return and dig out burrows.



A good example of a "carpet" of scat

Refer to the paper 'Surveying for Pygmy Rabbits (*Brachylagus idahoensis*)' (Ulmschneider, Hays and Rachlow) for detail survey details, habitat preferences, behavior and measurements.

# Scat:

Pellets are round without dents or points. Average size is 4-6mm, but pregnant females can be as large as 11mm in diameter. Small cottontails can produce very small pellets 6-10mm. Jackrabbits produce pellets that are 9-12mm in diameter. Look for uniformly small pellets around a burrow entrance. If you see a decent burrow WITHOUT pellets that could be from rabbits eating their own poop (Coprophagry) or from ants taking them to their pile. Fresh pellets are brown in color while older pellets are gray in color. Make note of the color when surveying.

# Pygmy Rabbit Sign

Source: "Surveying for Pygmy Rabbits (Brachylagus idahoensis)" (Ulmschneider et al. 2008)

### Burrows (Photos 22 to 25)

- Burrow entrances range from 4-10 inches across, usually fairly round but may be slightly wider than tall. The size of pygmy rabbit burrows usually surprises biologists the first time they see them because the holes are larger than they would have thought; many would have identified them as badger burrows. The older a burrow, the more the entrance seems to get enlarged, possibly from predators digging.
- Burrows are most often placed right at the base of a sagebrush, or occasionally another shrub species. Sometimes an entrance will be more in the open, but the majority of entrances will be underneath sage.
- At burrows, usually you will find the sagebrush so dense that walking is difficult, and you have to thread your way through it (which means >30% canopy cover). In more open sagebrush where you can walk more freely, you will probably not find burrows.
- The opening of the burrow usually flares out, and there may be a large pile of dirt outside the entrance, 1 to 3 feet in diameter.
- Usually, there will be more than one entrance in a burrow system; 2-4 is most common, with a maximum of up to 12, and occasionally there is only one.
- The burrow can slope down very steeply or moderately, and the burrow often narrows down from the flared entrance to about 4-5 inches in diameter.
- At currently used burrows, there will often be a lot of fresh dirt piled outside the entrances. Key your search on piles of fresh dirt to find burrows.
- Burrow systems will rarely be isolated; there will be a number of them in a habitat area. Isolated burrows without pellets are difficult to identify with certainty.
- A key feature of pygmy rabbit burrow systems is that they show evidence of having been built up and used over many years, unlike ground squirrel or badger diggings, which are generally a one-time affair. Pygmy rabbits remodel in the same spot year after year, creating mounded areas with taller, denser sagebrush growing on the old dirt piles, and evidence of burying the lower stem of nearby sagebrush over time. The undisturbed areas between these mounded areas will have a fairly level ground surface.
- Sagebrush grows taller and denser on the mounded dirt. As pygmy rabbits 'remodel' over the years, filling in one tunnel and digging new ones within the same burrow system, they create overlapping mounds of varying ages in one area. The resulting complex of mounded area may be 15 to 30 ft in diameter. Thus, pygmy rabbit burrow areas have old mounding with plants and shrubs growing on them in addition to the current fresh dirt piles.

It is common to find many old burrows, with no fresh pellets, while surveying. In general, unoccupied old burrows appear to last some years. However, in Nevada, extensive burrow systems can "melt" completely into non-existence over the course of two to four weeks of wet weather in certain soils. All evidence of burrows was erased. Some of these burrows had been associated with very high pygmy rabbit activity just a few weeks prior. Later, the rabbits appear to return and dig burrows again.

## **Pellets** (Photos 26 to 27)

Rabbit pellets are distinctive: round, without dents or points, different from those of any other group of animals. Pygmy rabbit pellets are the smallest of the rabbit pellets, averaging 4-6 mm in diameter. However, the size can vary. Pregnant females produce bigger pellets, as large as cottontails, and up to 11 mm in diameter! (Dave Hays, pers. comm.). Young cottontails can produce very small pellets. Usually the size of pellets is uniform within a pellet group. Pellets are in little groupings near the burrow entrance and under sagebrush nearby. At an active burrow, there will often be a carpet of evenly-sized small pellets. Large quantities of uniformly small pellets around a burrow entrance are diagnostic of pygmy rabbits.

- Mountain cottontail pellets average 6-10 mm, but can be smaller. It appears that younger, smaller cottontails produce smaller pellets. Thus, they can overlap in size with pygmy rabbit pellets, creating potential for confusion. Be cautious: in Washington, genetic testing of pellets thought to be pygmy rabbit revealed they were from cottontails.
- Cottontails may use some of the same areas as pygmy rabbits, and may use their burrows. Beware particularly if there are rocky outcrops nearby. This is less of an issue in some places such as the Lemhi Valley, where the two do not commonly coexist. It can be more of a problem in smaller pygmy rabbit habitat patches intermixed with rock outcrops, such as in the Owyhee uplands. However, in Lakeview, Oregon, a telemetry study showed cottontails using the same habitats and some of the same burrows as the pygmy rabbits, though there are no rock outcrops for miles.
- Full-grown whitetail jackrabbit scat is 11-12 mm in diameter; blacktail jackrabbit pellets are about 9-10 mm in diameter.
- Rodents, including ground squirrels, have oblong droppings.
- Recent rabbit pellets are usually a dark to medium brown to greenish or blackish color. Very fresh pellets have sheen or appear somewhat glossy. Older pellets appear somewhat dull and eventually weather to gray. If the rabbits have been eating a lot of dry grass, fresh pellets may be more tan, the color of dry grass, and a little larger. If rabbits have been eating green wet vegetation in the spring, the pellets can be almost black on the outside, green on the inside, and may be more elongated and have little pinched ends, being softer when they were deposited.
- It is not known how long pellets last or how long they take to turn grey. Weather conditions affect how fast they turn grey; dry pellets will stay brown, wet pellets will turn grey faster. Pellets under winter snow may stay very fresh looking until uncovered the next spring. In an experiment at 6000 ft in southwest Idaho, pellets gathered fresh in April and placed under a sagebrush were still brown in December. By the next April, they were grey, probably from the wet of winter snows and spring rains followed by exposure to sunlight.
- Some ants collect the pellets, so if you find burrows and no pellets, it may be due to ants. Look for pellets on the conical ant piles.
- Rabbits sometimes eat their own pellets (coprophagy), apparently mostly during the night.

# Other Burrows (photos 28 to 31)

- A key difference between pygmy rabbit and badger or ground squirrel burrows is that badger and ground squirrel burrows generally do not create large complex mounds of overlapping dirt piles where sage has regrown.
- Richardson's ground squirrels make smaller holes the size of the diameter of their bodies (approximately 2 -3 inches), and which do not usually have a flared entrance or a sizable pile of dirt. They usually dig holes in the open, overall occupy more open areas, and are often associated with a wet area of some kind. Belding's ground squirrel burrows are similar, but are in dry areas, and can be found under sagebrush as well as in the open. Pygmy rabbit and ground squirrel burrows may be mingled in the same area. Any ground squirrel may use pygmy rabbit burrows, or may dig their smaller burrows off of pygmy rabbit tunnels.
- Piute (Townsend's) ground squirrels also have small burrows with little dirt around them, and may be both under bushes or out in the open, but not particularly near water.
- Antelope ground squirrels have many small entrance holes placed in a mound of dirt 5 -10 ft across and a foot or so high. Kangaroo rat burrows are similar. Both tend to be in sandier soils than pygmy rabbit burrows.
- Desert cottontails can dig burrows. Generally, they dig simple natal burrows, and do not live in burrow systems.
- Badger diggings are typically bigger than those of pygmy rabbits, 12-18 inches across and very round. Where there are ground squirrels, badger diggings may be numerous. Typically, however, you will see large, badger-dug holes located next to small ground squirrel holes, at least while ground squirrels are active. So instead of several moderate-sized burrow entrances near each other, like a pygmy rabbit burrow system, there will be big and small burrows together. Additionally, badger hunting burrows are one-time affairs, and even their natal burrows are only used briefly during one year.
- Where badgers have dug out pygmy rabbit burrows, which is common in some areas, the entrance will be enlarged to 12 to 18 inches, and very round, with a large pile of dirt. You probably will find both badger-dug and regular pygmy rabbit burrows in the area.
- Coyote and fox burrows are bigger, and more in the open, not under the sage. There will be only one burrow system in an area, not a number of them.
- Chipmunks, pocket mice, and deer mice all have burrows that are tiny (1 inch in diameter or so) and no or little loose dirt outside.
- Pocket gophers produce a mound of dirt about a foot in diameter, approximately 4-6 inches high, and the entrance hole, approximately 2-3 inches in diameter, is hidden under the mound of dirt. There will be a number of mounds in an area, and they are usually more in the open, between the bushes. In winter, pocket gophers tunnel under snow and fill the tunnels with soil; these will produce ropes of soil after the snow melts. They move through the landscape as they burrow, rather than maintaining a stationary burrow system.

# Are Burrows from Pygmy Rabbit?

The combination of all factors must be considered in deciding whether burrows are from pygmy rabbits: the habitat, the burrow itself, pellets, and the pattern of burrows on the landscape. No other animal digs burrows with the combination of features of those of the pygmy rabbit: in taller dense sagebrush habitat, burrow entrance 5-7 inches average diameter, located under sagebrush, small round pellets, and a number of burrow systems in an area. A burrow system with a carpet of small rabbit pellets around it is diagnostic of pygmy rabbits.

- First, you need to find both burrows and pellets together.
- For burrows that appear characteristic of pygmy rabbits but have no pellets, search further in the area, and/or look at another time of year. If you find other burrows with pygmy rabbit pellets in the area, then you can conclude that other, similar burrows without pellets are also from pygmy rabbits. Old burrows may tell us something about changes in population extent or density and are also important to map.
- If you find small rabbit pellets but no burrows in the area, they are probably from mountain cottontails, especially near rocks. Burrows are an essential piece of evidence, because the pygmy rabbit seldom ventures far from them. There should be a number of burrow systems in an area, within a habitat patch.
- Is it the right habitat big sagebrush and deep soils?
- Are the burrows placed underneath sage? Are they the right size and shape?
- What other animals are around? Be aware there may be cottontails and perhaps young jackrabbits producing small pellets similar in size to pygmy rabbit pellets, or ground squirrels, badgers, or other burrowers to sort out.
- Cottontails and ground squirrels may use burrows originally dug by pygmy rabbits, and further confuse the issue. However, of the rabbits, only pygmy rabbits dig large burrow systems as a matter of course. In captivity, desert cottontails have dug burrows with one or two entrances and dig natal burrows in the wild.

# Sign in Snow

During winter, pygmy rabbit tracks and pellets in the snow can be more obvious than other times of the year. Pygmy rabbit tracks can generally be distinguished from other rabbits by the size of the hind foot (Table 1). During winter, juvenile cottontails are nearly the same size as adults, which should minimize overlap in track size between the species.

**Table 1.** Rabbit track sizes, from information in Forrest 1988, Green and Flinders 1980, and Katzner 1994.

	Pygmy	Rabbit	Cotto	ontail	Jackrabbit			
Back foot length	1.8-2.5 in	46-71 mm	3-3.5 in	77-90 mm	3.5-4 in	90-103 mm		
One track set (all four prints)	6-8 in		6.5-11 in		10-30 in			
Between track sets	6-16 in		8-22 in		10-60 in			

Pygmy rabbits traveling in fresh snow will re-use the same tracks, leaping from spot to spot a few inches apart (launching-and-landing sites), and leaving a diagnostic pattern. This keeps the rabbits relatively clear of snow and means that they can move much more easily in new snow than if they had to break trail every time they moved. As the rabbits use those sites for several days, the launching-and-landing sites get larger and larger and eventually become a continuous trail. Other rabbit species do not create this initial stage of re-used launching-and-landing sites. Over time, in older snow, pygmy rabbits create a complex maze of continuous trails between burrows.

It can be quite effective and efficient to drive two-track roads in sagebrush areas a day or two after a light snow, looking for launching and landing sites, measuring rabbit tracks, and following weasel or other predator tracks to locate pygmy rabbits. To find burrows, it can also be useful to look where snow on a sagebrush forms an umbrella with a cave underneath. Rabbits often use these areas and pellets and tracks will be found underneath. In the snow, active burrows will be obvious with tracks leading into and out from the entrances.

# **Photos:**



**Photo 22.** Leadore, Idaho. Pygmy rabbit near burrow entrance. Burrow position is further from base of sage than usual, which is why it can even be seen in a photo. Burrow also appears enlarged by badger digging. Most burrows are difficult to photograph because they look like a shadow under the sage.



**Photo 23.** Bruneau Field Office, BLM, Owyhee County, Idaho. Pygmy rabbit burrow entrance about 7-8 inches across.



Photo 24. Owyhee County, Idaho. Pygmy rabbit burrow in center of photo.



Photo 25. Owyhee County, Idaho. Badger tracks and digging at pygmy rabbit burrow in fresh snow.



**Photo 26.** Three sizes of rabbit pellets: large-whitetail jackrabbit, medium-mountain cottontail, and smallest-pygmy rabbit.



Photo 27. Pygmy Rabbit pellets (tiny) on ground with jackrabbit pellets, Oregon.



Photo 28. Paiute Ground Squirrel burrow, SW Idaho.



Photo 29. Richardson's ground squirrel burrow, SW Idaho.



**Photo 30.** Badger hunting burrow (>12 inches across) in Paiute ground squirrel area. Note how round it is, the large pile of fresh dirt, and how far into the burrow you can see. Usually you cannot see more than a few inches into a pygmy rabbit burrow without bending right down to the burrow.



**Photo 31.** Badger hunting burrow into Paiute ground squirrel burrows, large and small entrances next to each other, large piles of dirt.

# APPENDIX B PYGMY RABBIT SURVEY DATASHEET

# **Pygmy Rabbit Survey Form**

Observer(s):		<i>VO V</i>	v	Affiliation	::
Field Office:				Survey Acre	
Address:				Phone	
Observation Date:	Site Nam		Co.:	State:	Site #:
Township:	Range:	Meridian:	Section:	Quarter/Quarter	r: of Quarter:
Project / Transect I	D #:		Field Ma		
Survey Method:			Search T	ime: Start:	Stop:
<b>GPS Data</b>					
Projection:	Decimal Degrees	Decimal Minutes	Degrees/I	Minutes/Seconds	UTM Zone: 12 ☐ 13 ☐
Datum:	NAD27	NAD83	WGS84 □	<u> </u>	
Coordinates:	_	<del>_</del>	_	Elevation	
Starting point	Easting	Northing	;		Off
Accuracy:	PDOP	FOM	+/-	Feet Meters	s 🗍
Land Owners	ship: State	BLM $\square$	USFS $\square$	USFWS $\square$	Private* ☐ (state below)
	Tribal 🗌	Military	Nat. Park	Other:	
*Private lando	owner / Address / Phone:	:	_		
Potential Th	reats to Area: Agricu	lture Fire Devel	opment  Grazing	OHV None	Other:
Summary of Res	ults for Survey Rout	e	Pellets colle	cted? Yes 🗌	No 🗌
Pygmy rabbit obser	ved? Yes No	Pygmy Rabbit sign	observed? Yes	No ☐ Possible b	ourrows Possible Pellets
Summary of number	ers of burrows B+FP		UB+FP:	Col: B+dig:	<del>_</del>
Length of survey ro		_		Meters:	<del></del>
Predators (T- tracks,	S seet V visual) Coyot			S V Weasel T S V	Bobcat T S V
Notes. Provid	de directions, describe la			in why if no pygmy rab	obits were found,
describe behavi	ior of any pygmy rabbits	seen, etc.			

# CODES FOR DATA

Burrow Status	B+FP – used burrow	B+OP -	B – open	UB +FP	Col –	B+dig – burrow,	FP – fresh	Poss				
	plus brown, green, or	burrow	burrow, no	Unused	collapsed	fresh digging, no	pellets alone	Possible PR burrow				
	black pellets	plus grey pellets	pellets	burrow, fresh pellets	burrow	pellets						
Burrow Details	T - Clean trail O - Open Col - Collapsed Deb - Debris filled Dig - Fresh digging TS - tracks in snow US - Untracked snow B - At base of bush R - At base of rock E - Enlarged by predator											
Pellet Quantity	H – high, lots, a carpet	M – mode	rate <b>F-</b> few									
Soil	L - Loam S - sar	nd C	- Clay	G - Gravelly	R - Roc	ky						
Canopy Cover (20 ft radius)		- 6										
Grazing use level	0 - None 1 - slight 2	2 - light 3	moderate 4 -	heavy 5 – se	vere Use des	criptions from BLM	's Landscape Ap	pearance Method				

F							Car	юру	Cov	er	0	ua	seo	
Burrow #	UTM Easting	UTM Northing	Status	Burrow details	Pellets	Soil	Shrub	Grass	Forbs	Bare	Grass Use	PygRab seen	# of entrances	Comments

#### **Burrow Codes:**

<u>Used burrow plus fresh pellets (B+FP)</u>: brown pellets near a burrow, at least one entrance open, without cobwebs or debris that shows lack of use, usually shows a trail. In snow, tracks and/or pellets visible.

<u>Unused burrow plus fresh pellet (UB+FP)</u>: burrow entrances have cobwebs, grass seeds, or other debris in entrance, but with brown pellets. May show transitory use.

Burrow plus old pellets (B+OP): only grey pellets at a burrow, entrances may show signs of non-use.

<u>Burrow</u>, no pellets (B): burrow entrance is not collapsed but no pellets found. Also use this category for burrows in snow where no tracks or pellets are visible.

Collapsed burrow (Col): No pellets

Pellets only (P): No burrows found, but pellets appear right for pygmy rabbit. (Collect and label.)

<u>Fresh digging at a burrow but no pellets (B+dig)</u>: Digging may have been by a predator such as coyote or badger. If it was a predator, it was most likely digging after prey, and the prey may have been pygmy rabbit.

<u>Possible PR burrow (Poss)</u>: Burrow seems right for pygmy rabbit, but there are confusing pellets or no pellets, or it is not in association with other pygmy rabbit burrows (identified by pellets or sightings).

## BLM's Landscape Appearance Method for Classifying Grazing Use Level:

- 1. **None** (0-5 %). The rangeland shows no evidence of grazing use; or the rangeland has the appearance of negligible grazing.
- 2. **Slight** (6-20%). The rangeland has the appearance of very light grazing. The key herbaceous forage plants may be topped or slightly used. Current seedstalks and young plants of key herbaceous species are little disturbed.
- 3. **Light** (21-40%). The rangeland may be topped, skimmed, or grazed in patches. The low-value herbaceous plants are ungrazed and 60 to 80 % of the number of current seedstalks of key herbaceous plants remains intact. Most ground plants are undamaged.
- 4. **Moderate** (41-60%). The rangeland appears entirely covered as uniformly as natural features and facilities will allow. Fifteen to 20 % of the number of current seedstalks of key herbaceous species remains intact. No more than 10 % of the number of low-value herbaceous forage plants are utilized. (Moderate use does not imply proper use.)
- 5. **Heavy** (61-80%). The rangeland has the appearance of complete search. Key herbaceous species are almost completely utilized with less than 10 % of the current seedstalks remaining. Shoots of rhizomatous grasses are missing. More than 10 % of the number of low-value herbaceous forage plants have been utilized.
- 6. **Severe** (81-100%). The rangeland has a mown appearance and there are indications of repeated coverage. There is no evidence of reproduction or current seedstalks of key herbaceous species. Key herbaceous forage species are completely utilized. The remaining stubble of preferred grasses is grazed to the soil surface.

2022 Pvamv Rabbit Survev Repor	2022	Pvamv	Rabbit	Survey	Report
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Boardman to Hemingway Transmission Line

# APPENDIX C 2022 SELECT PYGMY RABBIT HABITAT PHOTOS



Photo 1: Not Habitat. Spiny hopsage and rabbitbrush, no sagebrush present.



Photo 2: Not Habitat. Too rocky and sparse.



Photo 3: Not Habitat. Too sparse and recently burned.





Photo 5: Not Habitat. Greasewood and bur buttercup, no sagebrush present.



Photo 6: Not Habitat. Grassland.



Photo 7: Not Habitat. Agriculture and canal.





Photo 9: Poor Habitat. Rocky soils.



Photo 10: Poor Habitat. Very sparse sagebrush present.



Photo 11: Poor Habitat. Very sparse sagebrush present.



Photo 12: Poor Habitat. Unhealthy, sparse sagebrush present.



Photo 13: Poor Habitat. Heavily grazed pastureland.



Photo 14: Poor Habitat. Sparse sagebrush and heavily grazed along road.



Photo 15: Habitat.





Photo 17: Habitat.





Photo 19: Habitat.





Photo 21: Habitat.



# Attachment 7-5. Scenic Resource Analysis (in work)

Table 1. Scenic Resources in the Analysis Area

Jurisdiction	Plan	Scenic Resources Identified? (Y/N)	Name of Scenic Resource	Location in Plan	Location of Scenic Resource	Map ID No.	Analyzed in ASC? (Y/N)	Plan Updates	Change in Findings? (Y/N)
Counties		,	Ö.					·	
Morrow County, OR	Morrow County Comprehensive Plan (1986) and Zoning Ordinance, as updated through 2011	N	None identified	Natural Resources Element	Not applicable (N/A)	N/A	N	Morrow County Comprehensive Plan Natural Resource Element (2019) and Zoning Ordinance as updated 2017	N
Umatilla County, OR	Umatilla County Comprehensive Plan (2008)	Y	Wallula Gap	pp. 8-11	On the Columbia River at and adjacent to the northern boundary of the county; outside of the analysis area	N/A	N	Umatilla County Comprehensive Plan Updated 2022	N
Union County, OR	Union County Land Use Plan (1979) and Technical Supplement (1984)	Y	Blue Mountain Forest Wayside <sup>1</sup>	Appendix J – Scenic Areas (p. 99)	The Blue Mountain Forest Wayside is a 0.5-mile-wide corridor of land located west of La Grande along Interstate 84 (I-84) within the analysis area. The area corresponds to the Union County portion of the Blue Mountain Forest State Scenic Corridor, which also includes lands in Umatilla County.	SR U1	Y	Union County 2050 Comprehensive Plan (2021)	N
			Minam River	Appendix J – Scenic Areas (p. 99)	45 miles of the river from Minam Lake to the confluence with the Wallowa River in the eastern part of Union County; outside of the analysis area	N/A	N		N
			United States (U.S.) Highway 26	Appendix I, Plate 10	Grant County line to junction with Oregon (OR) Highway 245, and east of Unity; outside of the analysis area	N/A	N		N
			OR Highway 245	Appendix I, Plate 10	From milepost (MP) 2.46 Unity Lake Park Entrance) to MP 37.03 (Junction Whitney Highway)	SR B3	Y		N
			OR Highway 203	Appendix I, Plate 10	From MP 22.9 (Baker/Union County line) to MP 31.09 (Salt Creek, east of junction with Sunnyslope Lane)	SR B1	Y		N
Paker County OR	Baker County Comprehensive Land Use Plan (1993), as	Y	I-84	Appendix I, Plate 10	From MP 317.39 (Pleasant Valley Interchange) to MP 329.24 (1.81 miles southeast of Durkee Interchange) within the analysis area	SR B4	Y	Baker County Oregon Natural Resources Plan	N
Baker County, OR	updated through 2012	T	I-84	Appendix I, Plate 10	From MP 345.78 (Huntington Interchange) to MP 352.0 (Baker/Malheur County line) within the analysis area	SR B5	Y	(2016)	N
			OR Highway 86	Appendix I, Plate 10	Flagstaff Hill eastward; from MP 4.81 (east of Sunnyslope Lane) to MP 40.64 (Eagle Creek)	SR B2	Υ		N
			OR Highway 86	Lane) to MP 40.64 (Eagle Creek)  SR B2  T  East of Richland and east of Halfway to Connecticid; both		N			
			Halfway-Cornucopia Highway	Appendix I, Plate 10	Cornucopia to Carson; outside of the analysis area	N/A	N		N
Malheur County, OR	Malheur County Comprehensive Plan (1982)	N	None identified	Section 2, pp. 110-113; Section 3, p. 226	N/A	N/A	N		N

Jurisdiction	Plan	Scenic Resources Identified? (Y/N)	Name of Scenic Resource	Location in Plan	Location of Scenic Resource	Map ID No.	Analyzed in ASC? (Y/N)	Plan Updates	Change in Findings? (Y/N)
			Bruneau River Canyon	p. 22	Upstream from C.J. Strike Reservoir in eastern Owyhee County; outside of the analysis area	N/A	N	N	N
			Owyhee Mountains	p. 22	Location not specified in the plan.	N/A	N	N	N
Owyhee County, ID	Owyhee County Comprehensive Plan (2010)	Υ	Morley Nelson Snake River Birds of Prey National Conservation Area	p. 22	Primarily in Ada County, north and east of Swan Falls; outside of the analysis area	N/A	N	N	N
			Bruneau Sand Dunes State Park	p. 22	East of C.J. Strike Reservoir in eastern Owyhee County; outside of the analysis area	N/A	N	N	N
Canyon County, ID	Canyon County 2020 Comprehensive Plan (2011)	N	None identified	Chapters 6, 10	N/A	N/A	N	N	N
Washington County, ID	Washington County Comprehensive Plan (2010)	N	None identified	pp. 34-37, 51-58	N/A	N/A	N	Washington County Comprehensive Plan (2020)	N
Benton County, WA	Benton County Comprehensive Land Use Plan (2006)	Υ	Rattlesnake uplift	Chapter 3, pp. 3-14	West of Richland; outside of the analysis area	N/A	N	Benton County Comprehensive Plan (2022)	N
Cities							: <del>-</del>	•	
City of Boardman	City of Boardman Comprehensive Plan (2003)	N	None identified	Chapter V	N/A	N/A	N	N	N
City of Irrigon	City of Irrigon Transportation System Plan (2005) and Development Code (2012)	N	None identified	Chapters IV-VI	N/A	N/A	N	City of Irrigon Transportation System Plan (2014) and Development Code (2017)	N
City of Ione	City of Ione Transportation Plan (1999)	N	None identified	Section 5	N/A	N/A	N	City of lone General Plan (2009), identified Q Ranch; outside of the analysis area.	N
City of Umatilla	City of Umatilla Comprehensive Plan (2010)	N	None identified	pp. 6-7, 21-25	N/A	N/A	N	City of Umatilla Comprehensive Plan (2013)	N
City of Hermiston	City of Hermiston Comprehensive Plan (1984) and Development Code, as updated through 2012	N	None identified	Chapters II, III	N/A	N/A	N	City of Hermiston Development Code, as updated through 2014	N
City of Stanfield	City of Stanfield Comprehensive Plan (2003) and Development Code (2003)	N	None identified	Development Code Chapters 2-3	N/A	N/A	N	City of Stanfield Development Code (2017)	N
City of Pilot Rock	City of Pilot Rock Comprehensive Plan (1979), Ordinance 489 (2001)	N	None identified	Chapters V, VIII	N/A	N/A	N	N	N
City of Pendleton	City of Pendleton Comprehensive Plan (1983, updated in 1990)	Υ	Umatilla River and tributaries	Chapter I, p. TR-2; Chapter II, p. TR-44	Umatilla River and its tributaries within the city limits and within the analysis area. The Umatilla River is located north of the City of Pendleton.	N/A	N	City of Pendleton Comprehensive Plan (1983, updated in Ordinance 3845, 2022)	N
City of La Grande	City of La Grande Comprehensive Plan (2009)	N	None identified	p. 23	N/A	N/A	N	City of La Grande Comprehensive Plan (2013)	N
City of Island City	City of Island City Comprehensive Plan (1984, 2001)	N	None identified	Chapter II, p. 19	N/A	N/A	N	City of Island City Development Code (2022)	N
City of Union	City of Union Land Use Plan (1984)	N	None identified	pp. 16-17	N/A	N/A	N	N	N

Jurisdiction	Plan	Scenic Resources Identified? (Y/N)	Name of Scenic Resource	Location in Plan	Location of Scenic Resource	Map ID No.	Analyzed in ASC? (Y/N)	Plan Updates	Change in Findings? (Y/N)
City of North Powder	City of North Powder Comprehensive Plan (1983)	N	None identified	N/A	N/A	N/A	N	N	N
City of Haines	City of Haines Comprehensive Land Use Plan (1979)	N	None identified	p. 3; Technical Information, Chapter 4	N/A	N/A	N	N	N
City of Baker City	City of Baker Comprehensive Plan (1978), as updated through 2012	N	None identified	p. 1 plus	N/A	N/A	N	City of Baker Comprehensive Plan (1978), as updated through 2020	N
City of Huntington	City of Huntington Comprehensive Land Use Plan (1987)	N	None identified	N/A	N/A	N/A	N	N	N
City of ∀ale	City of Vale Comprehensive Plan (2003) and Development Code	N	None identified	Development Code, Title VIII	N/A	N/A	N	City of ∀ale Development Code (2014)	N
City of Adrian	City of Adrian Comprehensive Plan (1978)	N	None identified	p. 11, Appendix B	N/A	N/A	N	N	N
State									
Oregon Parks and Recreation Department (OPRD)	No master plans applicable to seven state park system units within the analysis area; however, area was identified by OPRD. (2022)	Υ	Blue Mountain Forest State Scenic Corridor	N/A	Corridor is located along I-84, west of La Grande.	SR U1	Y	N	N
	State Scenic Waterways (OPRD 2012)	Υ	State Scenic Waterways	N/A	Outside of Analysis Area	N/A	N	State Scenic Waterways (2019)	N
Oregon	Columbia Basin Wildlife Areas Management Plan (2008a; includes Coyote Springs Wildlife Area)	N	N/A	Description and Environment	N/A	N/A	N	Columbia Basin Wildlife Areas Management Plan (2022)	N
Department of Fish and Wildlife (ODFW)	Ladd Marsh Wildlife Area Management Plan (2008b)	N	N/A	Description and Environment	N/A	N/A	N	Ladd Marsh Wildlife Area Management Plan (2018)	N
	Elkhorn Wildlife Area Management Plan (2006)	N	N/A	Description and Environment	N/A	N/A	N	Elkhorn Wildlife Area Management Plan (2017)	N
Oregon Department of Transportation	Hells Canyon Scenic Byway Corridor Management Plan (Eastern Oregon Visitors Association/ Hells Canyon Scenic Byway Committee, 2004)	N	N/A	III. Intrinsic Qualities and Context Statement	N/A	N/A	N	N	N
	Journey Through Time Tour Route Management Plan	N	N/A	Background; Vision, Goals, Objectives	N/A	N/A	N	N	N

Jurisdiction	Plan	Scenic Resources Identified? (Y/N)	Name of Scenic Resource	Location in Plan	Location of Scenic Resource	Map ID No.	Analyzed in ASC? (Y/N)	Plan Updates	Change in Findings? (Y/N)
	(Michael Wetter and Associates1996)								
Tribal									
Confederated Tribes of the Umatilla Indian Reservation (CTUIR)	Comprehensive Plan for the Confederated Tribes of the Umatilla Indian Reservation (2010)	N	None identified	5. Plan Elements: Goals & Objectives	N/A	N/A	N	Comprehensive Plan for the Confederated Tribes of the Umatilla Indian Reservation (2018)	N
Federal			-					W	
	Dakar Basawas Managanast		BLM-administered lands managed as VRM Class I and Class II	pp. 49-50, Map 5	Multiple tracts of BLM-administered lands within the Baker Resource Area and within the analysis area	VRM B1 – VRM B7	Y	N	N
BLM, Vale	Baker Resource Management Plan (1989a)	Υ	Oregon Trail Area of Critical Environmental Concern (ACEC)	pp. 46-49, Map 6	Six parcels of BLM-administered land in Umatilla, Union, and Baker Counties	SR B6	Y	N	N
District, Baker Resource Area			Powder River Canyon ACEC	pp. 46-49, Map 6	Along Powder River in north-central Baker County	SR B7	Y	N	N
	Powder River Final Management Plan (1994)	Y	Powder River WSR	p. 10	From Thief Valley Dam to the Highway 203 Bridge.	SR B7	Y	N	N
	Oregon National Historic Trail Management Plan (1989b)	Y	Oregon National Historic Trail	p. 11	Fourteen properties in management area; relevant properties include Tub Mountain, Birch Creek, Powell Creek, Straw Ranch I, Straw ranch II, Flagstaff Hill	SR B6	Y	N	N
			BLM-administered lands managed as VRM Class I and Class II	Chapter 2, p. 101; Chapter 3, pp. 274-276; Map ∀RM- Proposed Resource Management Plan	Multiple tracts of BLM-administered lands within the Malheur Resource Area and within the analysis area	VRM M1 – VRM M8	Y	N	N
	Drawaged Cauthagetern Oregon		Oregon Trail ACEC	pp. 68-102	Three tracts of BLM-administered lands in eastern Malheur County, all managed as VRM Class II	VRM M1, M2, M4	Y	N	N
BLM, ∀ale District, Malheur	Proposed Southeastern Oregon Resource Management Plan and Final Environmental	Υ	Owyhee River Below the Dam ACEC	pp. 68-102	Tract of BLM-administered lands in Lower Owyhee Canyon in eastern Malheur County, all managed as VRM Class II	VRM M5	Y	N	N
Resource Area	Statement (2001)		Owyhee Views ACEC	pp. 68-102	Multiple tracts of BLM-administered lands adjacent to Lake Owyhee in eastern Malheur County, all managed as ∀RM Class I	VRM, M7	Y	N	N
			Castle Rock, Dry Creek Gorge, North Fork Malheur river, and Leslie Gulch ACECs	pp. 68-102	Outside the Analysis Area	N/A	N	N	N
BLM, Boise	Owyhee Resource		BLM-administered lands managed as VRM Class I and Class II	p. 44; Appendix VISL-1; Map VISL-1	Jump Creek Canyon area southwest of Marsing, within the Owyhee Resource Area and within the analysis area	VRM O1	Y	N	N
District, Owyhee Resource Area	Management Plan (1999)	Y	Jump Creek Canyon ACEC	pp. 47-48, 81-85, Map ACEC-1	Portion of Jump Creek Canyon area managed as ∀RM Class I	VRM 01	Y	N	N
			Castle Rock, Dry Creek Gorge, North Fork Malheur River,	pp. 47-48, 81-85, Map ACEC-1	Outside the Analysis Area	N/A	N	N	N

Jurisdiction	Plan	Scenic Resources Identified? (Y/N)	Name of Scenic Resource	Location in Plan	Location of Scenic Resource	Map ID No.	Analyzed in ASC?	Plan Updates	Change in Findings? (Y/N)
			and Leslie Gulch ACECs						
BLM, Boise District, Cascade	Cascade Resource Management Plan (1987a)	Y	BLM-administered lands managed as VRM Class II	pp. 59, 2-6, 3-26; Map 3-8	Oxbow-Brownlee Special Recreation Management Area (SRMA), along east side of Brownlee Reservoir, within the analysis area	VRM C1 – VRM C2	Y	N	N
Resource Area	Management Plan (1967a)		Boise Front ACEC	pp. 31-37, Map 4	Tract of BLM-administered lands northeast of Boise in Ada and Elmore Counties, outside of the analysis area	N/A	N	N	N
BLM, Spokane District	Spokane Resource Management Plan Record of Decision (1987b)	Y	Badger Slope	pp. 16-17 (re: ACECs)	South of Yakima River between Prosser and Richland, outside of the analysis area	N/A	N	N	N
USFS, Wallowa- Whitman National Forest (NF)	Wallowa-Whitman National Forest Land and Resource Management Plan (1990a)	Y	NF lands managed as Visual Quality Objective (VQO) Preservation (none in analysis area) and Retention	Chapter Four, p. 4-42	Multiple areas of USFS-administered lands within the Wallowa-Whitman National Forest and within the analysis area	VQO 1 – VQO 6; VQO 8	Y	N	N
USFS, Elkhorn Drive National Forest	Elkhorn Drive National Forest Scenic Byway Management Plan (USFS 1994, Addendum 1996)	N	N/A	Resource Inventory	N/A	N/A	N	N	Z
USFS, Umatilla NF	Land and Resource Management Plan, Umatilla National Forest (1990b)	Y	NF lands managed as VQO Preservation and Retention (none in either category in analysis area)	pp. 4-22, 49, 95-198	No lands with Preservation or Retention VQO within analysis area	N/A	N	N	N
USFS, Umatilla NF	Wild and Scenic River (WSR) Study Report and Final Legislative Environmental Impact Statement for Eight Rivers (1997)	Y	Five Points Creek; Recommended for inclusion in the WSR system; Outstanding Remarkable Values (ORVs) include scenery	p. 11-4	Approximately 1 mile northeast of Hilgard	N/A	Y	N	N
Department of Defense, U.S. Navy, Naval Weapons System Training Facility, Boardman	Integrated Natural Resource Management Plan: Naval Weapons System Training Facility, Boardman, Oregon (2012)	N	None identified	N/A; scenic resources not addressed in plan	N/A	N/A	N	N	N
Bureau of Reclamation	Owyhee Reservoir Resource Management Plan (1994)	Y	The Honeycombs, Leslie Gulch, Painted Canyon, Three Fingers Gulch, Carlton Canyon	pp. 2-49 through 2-55	BLM-administered lands adjacent to Owyhee River and Owyhee Reservoir within the analysis area; addressed above under BLM Vale District, Malheur Resource Area	N/A	Y	N	N
U.S. Fish and Wildlife Service (FWS), Umatilla National Wildlife Refuge	Umatilla National Wildlife Refuge Comprehensive Conservation Plan (2007)	N	None identified	N/A; scenic resources not addressed in plan	N/A	N/A	N	N	N
FWS, McKay Creek National Wildlife Refuge	N/A; Comprehensive Conservation Plan in process, no plan prepared or adopted yet	N	N/A	N/A (no existing plan)	N/A	N/A	N	N	N

Jurisdiction	Plan	Scenic Resources Identified? (Y/N)	Name of Scenic Resource	Location in Plan	Location of Scenic Resource	Map ID No.	Analyzed in ASC? (Y/N)	Plan Updates	Change in Findings? (Y/N)
National Wildlife	N/A; Comprehensive Conservation Plan in process, no plan prepared or adopted yet	N	N/A	N/A (no existing plan)	N/A	N/A	N	N	N

<sup>&</sup>lt;sup>1</sup> This resource is analyzed as part of the Blue Mountain State Scenic Corridor administered by OPRD.

**Table 2. Updated Visual Impact Assessment Results** 

Table 2. Up	uateu vi	isuai iiiipa	CI ASS	essille	III Results								\$0.				
2.50	2	62	е			Part 1: I	Baseline Chara	cteristics		Part 2: Impac	t Assessment		8	Part 3: Sigr	nificance Determi	nation	nce
Scenic Resource by Jurisdiction (Map ID) <sup>1</sup>	Original Distance to Approved Route	Change in Distance <sup>2</sup>	Map Sheet Reference (Figure 7-11)	KOP(s)³	Change in Visibility Potential	Scenic Quality/ Scenic Attractivenes s Class	Landscape Character <sup>4</sup>	Observer Characteristics (Geometry/ Exposure) <sup>5</sup>	Impact Duration <sup>6</sup>	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>7</sup>	Contribution of the Project to Impacts <sup>8</sup>	Original Significance Determination <sup>9</sup>	Change to Significance Determination <sup>9</sup>
County - Unio	on									l.c.							2
Blue Mountain Forest Wayside (SR U1)	Crossed	No change	1	4-5	No significant change	В	Nat App	т	LT	Low	Low	Low	Low	NA	PE	Less than Significant	N
County - Bak	er					,							V.				
OR Highway 203 (SR B1)	3.3 miles	No change	2	5-34; 5-35	No significant change	С	Nat App	Т	LT	Low	Low	Low	Low	NA	CE	Less than Significant	N
OR Highway 86 (SR B2)	Crossed	No change	2	5-61; 5-32	No significant change	С	Nat App	Т	LT	Med	Med	Low	Med	NP	CE	Less than Significant	N
OR Highway 245 (SR B3)	7 miles	No change	2	N/A	No significant change	=	1	=		-	( <del>-</del>	<del></del>	-	Ħ	=	Less than Significant <sup>8</sup>	N
Interstate 84, Pleasant Valley- Durkee area (SR B4)	Crossed	No change	2	5-26; 5-15	No significant change	В	Cult	т	LT	High	High	Med	High	NP	PE	Less than Significant	N
Interstate 84, Huntington to Baker/Malhe ur County line (SR B5)	0.2 mile	-0.1 miles (0.1 miles), Durbin Quarry Alternative	2	5-34b	No significant change	В	Cult	т	LT	High	High	Med	High	NP	PE	Less than Significant	N Change in distance did not result significant increase in visibility.
State of Oreg	on: Oregon	Parks and R	ecreation	n Departm	nent	o	0 0			W					2Ar 12		× ×
Blue Mountain Forest State Scenic Corridor (SR U1)	Crossed	No change	1	4-5	No significant change	В	Nat App	Т	LT	Low	Low	Low	Low	NA	PE	Less than Significant	N
Federal - BLN	M, Vale Dist	trict, Baker Re	source /	Area	· · ·			<del></del>					<i>-</i>	- 12	7.2		

¥.jc	Q	<sub>9</sub> 2	Map Sheet Reference (Figure 7-11)		>	Part 1: Baseline Characteristics				t Assessment	G-1		nce				
Scenic Resource by Jurisdiction (Map ID) <sup>1</sup>	Original Distance to Approved Route	Change in Distance <sup>2</sup>		KOP(s) <sup>3</sup>	Change in Visibility Potential	Scenic Quality/ Scenic Attractivenes s Class	Landscape Character <sup>4</sup>	Observer Characteristics (Geometry/ Exposure) <sup>5</sup>	Impact Duration <sup>6</sup>	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>7</sup>	Contribution of the Project to Impacts <sup>8</sup>	Original Significance Determination <sup>9</sup>	Change to Significance Determination <sup>9</sup>
Powder River Canyon – Keating (VRM B2)	5.7 miles	No change	2	N/A	No change	-	Ī		1	-	Ī		-	-		Less than Significant <sup>8</sup>	N
Burnt River Canyon (VRM B3)	Crossed	No change	2	5-81	Pockets of slight increase	В	Nat App	т	LT	High	Med	Low	Med	NP	PE	Less than Significant	N View duration remains limited.
Brownlee Reservoir West (VRM B7)	2.1 mile	No change	2	5-59	No significant change	В	Nat App	T; S	LT	Med	Med	Low	Med	NP	CE	Less than Significant	N
Oregon Trail ACEC – Blue Mountain Parcel (SR B6)	0.9 mile	No change	2	N/A	No significant change	В	Nat App	T; S	LT	Low	Low	Low	Low	NA	PE	Less than Significant	N
Oregon Trail ACEC – NHOTIC Parcel (SR B6)	0.02 mile	No change	2	5-25c; 5-25d; 5-25e	No significant change	В	Cult	T; S	LT	Med	Med	Med	Med	NP	CE	Less than Significant	N
Oregon Trail ACEC – White Swan Parcel (SR B6)	2.9 miles	No change	2	N/A	No change	-	Б	-	=	-	(5)		-	-		Less than Significant <sup>8</sup>	N
Oregon Trail ACEC – Straw Ranch 2 Parcel (SR B6)	1.1 mile	No change	2	N/A	No significant change	С	Nat App	Т	LT	Low	Low	Low	Low	NA	CE	Less than Significant	N

y <u>(</u> C	Scenic Resource by Jurisdiction (Map ID) <sup>1</sup> Original Distance to Approved Route Change in Distance <sup>2</sup>	9 <sub>2</sub>	e	KOP(s) <sup>3</sup>	Change in Visibility Potential	Part 1: Baseline Characteristics			Part 2: Impact Assessment					nce			
Scenic Resource b		Change in Distanc	Map Sheet Reference (Figure 7-11)			Scenic Quality/ Scenic Attractivenes s Class	Landscape Character <sup>4</sup>	Observer Characteristics (Geometry/ Exposure) <sup>5</sup>	Impact Duration <sup>6</sup>	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>7</sup>	Contribution of the Project to Impacts <sup>8</sup>	Original Significance Determination <sup>9</sup>	Change to Significance Determination <sup>9</sup>
Oregon Trail ACEC – Straw Ranch 1 Parcel (SR B6)	0.1 mile	No change	2	N/A	No significant change	С	Cult	т	LT	Med	Med	Med	Med	NP	CE	Less than Significant	N
Oregon Trail ACEC – Powell Creek Parcel (SR B6)	1.2 mile	No change	2	N/A	No significant change	С	Cult	т	LT	Med	Med	Med	Med	NP	CE	Less than Significant	N
Powder River Canyon ACEC and WSR (SR B7)	1.4 mile	No change	2	5-34; 5-35	No significant change	В	Nat App	T; S	LT	Med	Med	Low	Med	NP	CE	Less than Significant	N
Federal - BLI	VI, Vale Dist	trict, Malheur	Resourc	e Area		<b>)</b>							V.				i
Oregon Trail ACEC – Birch Creek parcel (VRM M1)	0.2	No change	2	8-3	No significant change	С	Hist	T; S	LT	Med	Med	Med	Med	NP	PE	Less than Significant	N
Oregon Trail ACEC – Tub Mountain Parcel (VRM M2)	0.5 mile	No change	2	8-1; 8-24	No significant change	С	Nat App	T; S	LT	Med	High	Low	High	NP	PE	Less than Significant	N
Sugarloaf Butte (VRM M3)	1.6 mile	No change	2	N/A	No significant change	С	Nat App	T; S	LT	High	High	Med	High	NP	PE	Less than Significant	N
Five Points Creek (WSR1)	2.0 miles	No change	1	N/A	No significant change	A	Nat App	T; S	LT	Low	Low	Low	Low	NA	PE	Less than Significant	N
Lower Owyhee River (VRM M5)	Crossed	No change	3	8-52	No significant change	A	Nat App	T; S	LT	Med	Med	Low	Med	Р	CE	Less than Significant	N

Scenic Resource by Jurisdiction (Map ID) <sup>1</sup> Original Distance to		9-2	Map Sheet Reference (Figure 7-11)	KOP(s) <sup>3</sup>	Change in Visibility Potential	Part 1: I	Part 2: Impact Assessment				2	- JCe					
	Original Distance to Approved Route	Change in Distance <sup>2</sup>				Scenic Quality/ Scenic Attractivenes s Class	Landscape Character <sup>4</sup>	Observer Characteristics (Geometry/ Exposure) <sup>5</sup>	Impact Duration <sup>6</sup>	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>7</sup>	Contribution of the Project to Impacts <sup>8</sup>	Original Significance Determination <sup>9</sup>	Change to Significance Determination <sup>9</sup>
Succor Creek (VRM M8)	3.9 miles	No change	3	N/A	No significant change	С	Nat App	T	LT	Low	Low	Low	Low	NA	PE	Less than Significant	N
Federal – BLM, Owyhee Resource Area																	
Jump Creek Canyon and Jump Creek ACEC (VRM O1)	4.9 mile (in State of Oregon)	No change	3	12-8	No change	-	-	-	1		-1	-	-	-	-	Less than Significant <sup>8</sup>	N
Federal – BLM, Boise District, Cascade Resource Area																	
Brownlee Reservoir Southeast (VRM C1)	0.6 mile	No change	2	N/A	No significant change	В	Nat App	T; S	LT	Med	Med	Low	Med	NP	CE	Less than Significant	N
Brownlee Reservoir Northeast (VRM C2)	6.0 miles	No change	2	N/A	No change		-	-	==	-	-	-		-		Less than Significant <sup>8</sup>	N
Federal - USI	FS Wallowa	-Whitman Na	tional Fo	rest		ı											*
VQO 1	0.0 mile	No change	1	N/A	No significant change	В	Nat App	Т	LT	Low	Low	Low	Low	NA	PE	Less than Significant	N
VQO 2	Crossed	No change	1	4-4; 4-24;	No significant change	В	Cult	T; S	LT	High	Low	Low	Low	NA	CE	Less than Significant	N
OR 244 Corridor – Red Bridge West (VQO 3)	4.4 miles	No change	1	N/A	No significant change	В	Nat App	Т	LT	Low	Low	Low	Low	NA	N/A	Less than Significant	N
OR 244 Corridor – Red Bridge East (VQO 4)	1.4 miles	No change	1	4-3	No significant change	В	Nat App	T; S	LT	Low	Low	Low	Low	NA	PE	Less than Significant	N
Mt Emily (VQO 6)	5.2 miles	+0.7 miles (5.9miles)	1	N/A	No change		1.575	0.000	₩ <u>₩</u>	-	1.575)		1776	-	175N	Less than Significant <sup>8</sup>	N

> 6	62 to 0.52		e c		>	Part 1: Baseline Characteristics				Part 2: Impac	ct Assessment			Part 3: Significance Determination			
Scenic Resource by Jurisdiction (Map ID) <sup>1</sup>	Original Di Approve Change in (Figure	nge in Distan Sheet Refere (Figure 7-11)	Sheet Refere (Figure 7-11)	(s) <sub>3</sub>	Change in Visibility Potential	Scenic Quality/ Scenic Attractivenes s Class	Landscape Character <sup>4</sup>	Observer Characteristics (Geometry/ Exposure) <sup>5</sup>	Impact Duration <sup>6</sup>	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context <sup>7</sup>	Contribution of the Project to Impacts <sup>8</sup>	Original Significance Determination <sup>9</sup>	Change to Significal Determination <sup>9</sup>
OR 237 Corridor West (VQO 7)	11.7 miles	No change	2	N/A	No change	-		-	Е	1-1	1		1.000	-		Less than Significant <sup>8</sup>	N Remains outside of analysis area.
OR 203 Corridor – Catherine Creek (VQO 8)	8.0 miles	No change	1	5-34; 5-35	No change	_	_	_	-	-			P <u>aw</u> n			Less than Significant <sup>8</sup>	N

<sup>&</sup>lt;sup>1</sup> Map ID = The reference label used to indicate location of scenic resources on location and viewshed maps presented in Figures R-1 and R-2.

<sup>&</sup>lt;sup>2</sup> "No change" in distance means that the site boundary changes are not any closer to the resource than what was analyzed for the Approved Route.

<sup>&</sup>lt;sup>3</sup> KOP = Key Observation Point.

<sup>&</sup>lt;sup>4</sup> Landscape Character Type: Nat App = Naturally Appearing; Cult = Cultural; Hist = Historical.

<sup>&</sup>lt;sup>5</sup> Observer Characteristics: T= Transient; S = Stationary.

<sup>&</sup>lt;sup>6</sup> Duration: LT = Long-term; ST= Short-term.

<sup>&</sup>lt;sup>7</sup>Context: NP = Not Precluded; P = Precluded; NA = Not Analyzed; low intensity impact.

<sup>&</sup>lt;sup>8</sup> Contribution of the Project = Indicates if impacts are caused by the proposed facility (PE: Project Effects), or the combined influence of the Project and other past or present actions (CE = Combined Effects).

<sup>&</sup>lt;sup>9</sup> S = Screened; Impacts are considered Less than Significant based on screening criteria applied to the analysis.

# Attachment 7-6. Recreational Opportunities in the Analysis Area and Importance Assessment

Table 1 Recreational Opportunities within the Undated Analysis Area and Associated Impacts

Table 1. Recreational Opportunities within the Updated Analysis Area and Associated Impacts										
Recreational Opportunity within the Updated Analysis Area <sup>1</sup> (pale green indicates new	Location of Recreation Opportunity Relative to the RFA 1 Alterations (change relative to ASC analysis) <sup>2</sup> (Orange indicates previously identified resource that decreased in proximity from the approved	Important Recreation						Overall Recreation		
resource)	Project)	Opportunity	Map Sheet Reference	Loss of Opportunity	Noise Impacts	Traffic Impacts	Visual Impacts	Impact		
Deer Flat National Wildlife Refuge (NWR) – Snake Island Unit	0.6 mi SW (no decrease from approved Project)	Yes	3	Less than significant temporary intermittent access delays during construction; no long-term loss of opportunity.	Less than significant temporary construction-related noise impacts due to proximity of the updated site boundary; however, noise impacts will be temporary and episodic and dBA levels will attenuate with distance (see Exhibit X of the ASC). Areas located the farthest north near a multi-use area may experience temporary traffic-related noise.	Less than significant temporary traffic impacts possible during construction. Although some units are close to the Project site, others are several miles away. Many are more accessible from US 95 in Idaho than they are to I-84 in Oregon. Those parcels most affected will be near Huntington and Adrian, OR. Closest multi-use areas are those in Malheur and Owyhee counties. No or negligible impacts during operation.	One of 101 islands within the NWR will be within 2 miles of the Project. One tower (0.4 mile away) and one multiuse site (0.2 mile away) will introduce medium magnitude impacts; 95% of the NWR will have no visual impacts. Additionally, scenery is not identified as important to the NWR.	Impacts limited to temporary traffic increases and low intensity visual impacts. Overall impacts less than significant.		
Oregon Trail Area of Critical Environmental Concern (ACEC) – Birch Creek Special Recreation Management Area (SRMA)	0.4 mi E (no decrease from approved Project)	Yes	3	None expected.	Less than significant temporary construction-related noise impacts due to proximity of the updated site boundary to this recreation site. Areas near haul routes and multi-use areas may experience traffic-related noise; however, impacts will be temporary and episodic.	Less than significant, temporary traffic impacts possible during construction due to close proximity to I-84, access roads, multi-use area MA-01, and the updated site boundary. Project construction activity is not expected to cause delays for visitors accessing the area. No or negligible impacts during operation.	Lower stature H-frame towers will not substantially lower the quality of the adjacent scenery. Landscape character, particularly as viewed to the north toward Big Bend, will remain. Medium intensity impacts will be less than significant.	Impacts limited to temporary traffic increases and medium intensity visual impacts. Visual impacts will not preclude recreation activities. Overall impacts less than significant.		
Oregon Trail ACEC – Tub Mountain SRMA	1.5 mi E (no decrease from approved Project)	Yes	3	Intermittent access delays during construction likely; no long-term loss of opportunity.	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary, multi-use areas, and access roads. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Project construction activity will occur to the east and south requiring visitors to cross the construction area when accessing the SRMA, likely causing intermittent delays. Temporary traffic impacts possible during construction due to this arrangement, as well as close proximity to I-84, access roads, the updated site boundary, and multi-use area MA-02. No or negligible impacts during operation.	Project will be generally located to the east and most towers will either not be visible or only the top portions will be visible.  Views will primarily be peripheral and intermittent; therefore, visual impacts to SRMA visitors will be low.	Temporary, intermittent adverse impacts to access and traffic delays are likely. Visual impacts will be high intensity but have an overall low impact to visitor experience due to their visibility throughout the SRMA. Overall impacts less than significant.		

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Recreational Opportunity within the Updated Analysis Area <sup>1</sup> (pale green indicates new resource)	Location of Recreation Opportunity Relative to the RFA 1 Alterations (change relative to ASC analysis) <sup>2</sup> (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Important Recreation Opportunity	Map Sheet Reference	Loss of Opportunity	Noise Impacts	Traffic Impacts	Visual Impacts	Overall Recreation Impact
Owyhee River Below the Dam SRMA and ACEC	1.9 mi E (no decrease from approved Project)	Yes	4	Less than significant, temporary intermittent access delays during construction possible for some visitors; no long-term loss of opportunity.	Less than significant, temporary noise impacts possible during construction due to proximity to the updated site boundary, multi-use areas, and access roads. However, noise dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction for some visitors due to the close proximity to the updated site boundary, access roads, and multi-use areas MA-07 and MA-08 each about 5 miles away. No or negligible impacts during operation.	Project facilities prominent, but not dominant, in view to visitors near entry to SRMA, but views will be episodic as visitors travel along the roadway. Towers also highly visible from Lower Owyhee Watchable Wildlife interpretive site but located behind the viewer. Impacts will be medium intensity and less than significant (see visual simulation in Exhibit T, Attachment T-5 of the ASC).	Temporary access and traffic impacts to Lake Owyhee. Medium intensity visual impacts will be episodic, only affecting a small portion of the SRMA, and primarily behind the viewer such that viewer experience will not be noticeably affected throughout the SRMA or at identified recreation sites and will be less than significant.
Blue Mountain Forest State Scenic Corridor	Crosses (no decrease from approved Project)	Yes	2	Less than significant, temporary intermittent changes to access possible during construction; no long-term loss of opportunity.	Less than significant temporary construction-related noise impacts due to proximity of the updated site boundary to this recreation site, and the location where this recreation site is crossed. Areas near haul routes and multi-use areas may experience traffic-related noise; however, impacts will be temporary and episodic.	Less than significant temporary traffic impacts possible during construction as a result of nearby Preliminary Haul Roads including I-84, other access roads, and multi-use area UM07; no or negligible impacts during operation.	Steep viewing angles, tall mature vegetation, and topography will screen views of the Project. Viewers will have primarily intermittent and peripheral views and landscape character and scenic integrity and attractiveness will not change. Impacts will be low intensity and less than significant (see visual simulation in Exhibit T, Attachment T-5 of the ASC).	Impacts limited to temporary access and traffic impacts and low intensity visual impacts. Overall impacts less than significant.
Farewell Bend State Recreation Area (SRA)	0.4 mi W (0.2 mi decrease from approved Project)	Yes	3	Less than significant intermittent access delays during construction possible; no long-term loss of opportunity.	Less than significant, temporary construction-related noise impacts due to proximity of the updated site boundary, multi-use areas, and access roads; however, impacts will be temporary and episodic. Noise-related impacts will also be mitigated by the proximity of I-84 and its contribution to existing baseline noise levels.	Less than significant, temporary traffic impacts possible during construction due to proximity to multi-use area UM06, I-84, US 30, and several access roads. No or negligible impacts during operation.	Project will be most visible from shoreline day-use and overnight use areas and introduce moderate visual contrast. The Brownlee Reservoir, which is the primary scenic attribute of the SRA, will persist and views from the SRA to the east will be unaffected.	Temporary impacts to access and traffic. Visual impacts will affect visitor experience; however, the Project will not preclude visitors from continuing to enjoy the dayuse and overnight park facilities. Therefore, overall impacts to visitor experience will be less than significant.

Recreational Opportunity within the Updated Analysis Area <sup>1</sup> (pale green indicates new resource)	Location of Recreation Opportunity Relative to the RFA 1 Alterations (change relative to ASC analysis) <sup>2</sup> (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Important Recreation Opportunity	Map Sheet Reference	Loss of Opportunity	Noise Impacts	Traffic Impacts	Visual Impacts	Overall Recreation Impact
Hilgard Junction State Park	0.6 mi SE (no decrease from approved Project)	Yes	2	Less than significant, temporary intermittent access delays possible during construction for some visitors; no long-term loss of opportunity.	Negligible construction- related noise impacts construction-related noise impacts due to proximity of recreation site to I-84.	Less than significant, temporary traffic impacts possible during construction due to close proximity of the updated site boundary, Preliminary Hauling Roads, and access roads; nearest multi-use area (UN-01) is about 7 miles away. No or negligible impacts during operation.	Partially screened Project facilities likely visible at middleground distance, but not visible from camping area or areas near the river where recreation use will be highest. Impacts will be low intensity and less than significant.	Impacts limited to temporary access and traffic delays near the park entrance and low intensity visual impacts.  Overall impacts less than significant.
Lindsay Prairie Preserve / State Natural Heritage Area (SNHA)	1.3 mi E (0.3 mi decrease from approved Project)	No	1	N/A	N/A	N/A	N/A	N/A
Oregon Trail Interpretive Park at Blue Mountain Crossing	1.1 mile W (no decrease from approved Project)	Yes	2	Access delays during construction unlikely; no long-term loss of opportunity.	Negligible construction- related noise impacts due to distance of recreation site from construction noise sources (including access roads) and the expected attenuation of dBA levels based on distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to close proximity to I-84, access roads, and the updated site boundary. Closest multi-use area (UM07) is over 10 miles away. No or negligible impacts during operation.	Cleared right-of-way will be screened from view and towers will be partially screened and introduce low visual contrast. Impacts will be low intensity and less than significant (see visual simulation in Exhibit T, Attachment T-5 of the ASC).	Impacts limited to temporary traffic increases and low intensity visual impacts. Overall impacts less than significant.
Morgan Lake Park	0.4 mi SW (no decrease from approved Project)	Yes	2	Less than significant, temporary, intermittent access delays during construction; no long-term loss of opportunity.	Less than significant temporary construction-related noise impacts due to proximity of the updated site boundary to this recreation site. Areas near haul routes and multi-use areas may experience traffic-related noise; however, impacts will be temporary and episodic.	Less than significant, temporary traffic impacts possible during construction due to the proximity to access roads, the updated site boundary, and I-84; the two nearest multi-use areas (UN01 and UN02) are about 5 miles away. No or negligible impacts during operation.	Vegetation will block views of the towers from most locations in the park. The cleared right-of-way will not be visible. Viewers could experience weak contrast from the Project while engaging in transient or stationary activities.	Impacts limited to temporary access and traffic delays and low intensity visual impacts. Overall impacts less than significant.

Recreational Opportunity within the Updated Analysis Area¹ (pale green indicates new resource)	Location of Recreation Opportunity Relative to the RFA 1 Alterations (change relative to ASC analysis)²  (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Important Recreation Opportunity	Map Sheet Reference	Loss of Opportunity	Noise Impacts	Traffic Impacts	Visual Impacts	Overall Recreation Impact
Burnt River Extensive Recreation Management Area (ERMA)	Crosses (no decrease from approved Project)	Yes	3	Less than significant intermittent access delays during construction possible; no long-term loss of opportunity.	Less than significant temporary construction-related noise impacts due to proximity of the updated site boundary to this recreation site, and the location where this recreation site is crossed. Areas near haul routes and multi-use areas may experience traffic-related noise; however, impacts will be temporary and episodic.	Less than significant, temporary traffic impacts possible during construction due to overlap with the updated site boundary, access roads, and proximity to multi-use areas BA03 and BA04. No or negligible impacts during operation.	Localized adverse impacts to the Burnt River ERMA will result from strong visual contrast of Project features; however, localized visual impacts will not preclude recreation opportunities within the Burnt River ERMA.	Impacts limited to temporary impacts to access and traffic. Medium intensity, localized, visual impacts. Therefore, overall impacts to visitor experience will be less than significant.
Blue Bucket Lost Dutchman's Mining Association (LDMA) Camp	1.5 mi W (no decrease from approved Project)	No	3	N/A	N/A	N/A	N/A	N/A
Snake River Breaks ERMA	1.2 mi W (no decrease from approved Project)	Yes	3	Less than significant intermittent access delays during construction possible; no long-term loss of opportunity.	Negligible construction- related noise impacts due to proximity of recreation site to I-84.	Less than significant, temporary traffic impacts possible during construction due to the proximity to multiuse area BA06, access roads, the updated site boundary, and I-84. No or negligible impacts during operation.	Visual impacts will be medium intensity and characterized by low viewer perception. Visual impacts will not preclude recreation opportunities within the Burnt River ERMA. There will be no visual impacts to the Oxbow and Hells Canyon reservoirs. Visual impacts to Snake River Breaks ERMA will be less than significant.	Impacts limited to temporary impacts to access and traffic. Medium intensity, localized, visual impacts. Therefore, overall impacts to visitor experience will be less than significant.
Weiser Dunes Off- Highway Vehicles (OHV) Play Area	0.8 mi SW (no decrease from approved Project)	Yes	3	None expected.	Negligible construction- related noise impacts due to proximity of recreation site to I-84.	Project construction activity is not expected to cause delays for visitors accessing the play area due to location across the river from all multi-use areas, access roads, I-84, and the updated site boundary. No or negligible impacts during operation.	Project will be visible throughout the play area and viewed by individuals riding OHVs and picnicking or camping. Medium intensity impacts will be less than significant.	No loss of opportunity and no or negligible impacts from traffic congestion or delays. The play area provides novice and intermediate terrain for OHV use and is not correlated with scenery or views experienced from the area. Medium intensity visual impacts will have a less than significant impact on the overall visitor experience.

Recreational Opportunity within the Updated Analysis Area <sup>1</sup> (pale green indicates new resource)	Location of Recreation Opportunity Relative to the RFA 1 Alterations (change relative to ASC analysis) <sup>2</sup> (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Important Recreation Opportunity	Map Sheet Reference	Loss of Opportunity	Noise Impacts	Traffic Impacts	Visual Impacts	Overall Recreation Impact
Snake River Islands (Huffman Island) Wildlife Area (WA)	0.7 mi W (no decrease from approved Project)	Yes	3	None expected.	Less than significant temporary construction-related noise impacts due to proximity of the updated site boundary; however, noise impacts will be temporary and episodic and dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant, temporary traffic impacts possible during construction due to very close access roads, as well as proximity to I-84, the updated site boundary, and multi-use area MA01. Project construction activity is not expected to cause delays for visitors accessing the area. No or negligible impacts during operation.	The Project will result in long-term visual impacts to the Snake River Islands WA (primarily Huffman Island) that will be low intensity as measured by visual contrast and scale dominance, resource change, and viewer perception. Impacts will be less than significant.	No loss of opportunity and no or negligible impacts from traffic congestion or delays. Low intensity visual impacts will not preclude recreation activities. Overall impacts less than significant.
Bully Creek Reservoir	0.8 mi N (no decrease from approved Project)	Yes	3	Less than significant temporary intermittent access delays during construction possible; no long-term loss of opportunity.	Less than significant temporary construction-related noise impacts due to proximity of the updated site boundary; however, noise impacts will be temporary and episodic and dBA levels will attenuate with distance (see Exhibit X of the ASC).	Less than significant temporary traffic impacts possible during construction due to close proximity of access roads, the updated site boundary, US 20, US 26, and multi-use areas MA02, MA03, and MA04. No or negligible impacts during operation.	Many of the towers will be screened by topography with only the upper portion of most towers visible, appearing subordinate in most areas. The reservoir will continue to be the dominant feature of the landscape, such that medium intensity visual impacts will have a minor effect to visitor experience and be insignificant.	Temporary impacts to traffic and access. Medium intensity, but less than significant visual impacts. Overall impacts less than significant.
Glass Hill Preserve/SNHA	1.6 mi W	Yes	2	Less than significant, temporary intermittent access delays during construction possible for some visitors; no long-term loss of opportunity. Note that the area is likely restricted from public access. <sup>3</sup>	Less than significant temporary construction-related noise impacts due to proximity of the updated site boundary to this recreation site, and the location where this recreation site is crossed. Areas near haul routes and multi-use area may experience traffic-related noise; however, impacts will be temporary and episodic. Note that the area is likely restricted from public access. <sup>3</sup>	Less than significant temporary traffic impacts associated with increased traffic on I-84, Glass Hill Road, Bushnell Lane, location between La Grande and multi-use area UN02, and overlap of access roads and the updated site boundary at the area. Note that the area is likely restricted from public access. <sup>3</sup> No or negligible impacts during operation.	Structures will introduce moderate visual contrast and appear co-dominant with the landscape and existing infrastructure. Viewer exposure may be negligible since the area is likely restricted from public access. Medium intensity and less than significant.	Impacts limited to temporary traffic increases and medium intensity visual impacts. Overall impacts less than significant.

<sup>&</sup>lt;sup>1</sup> Analysis Area, as defined in the Amended Project Order for the ASC, extends 2 miles from the Project site boundary. For the purposes of this analysis, the updated site boundary does not include the previously approved, unchanged portions of the site boundary and solely addresses the proposed alterations to the site boundary proposed by RFA1.

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<sup>&</sup>lt;sup>2</sup> RFA 1 Alterations, which are not inclusive of the previously approved, unchanged portions of the site boundary and solely address the alterations to the site boundary proposed by RFA1.

<sup>&</sup>lt;sup>3</sup> Information on access obtained through a personal communication between Kristen Gulick, Tetra Tech, and Lindsey Wise, Oregon State University, Institute for Natural Resources, July 13, 2022.

Table 2. Importance Assessment for Recreational Opportunities within the Analysis Area

				Importance Factors					
Recreational Opportunity (Reference Sources)	Responsible Entity	Description	Area	Designation or Management	Demand	Qualities	Rareness	Replaceability	Important Opportunity?
Deer Flat NWR – Snake Island Unit	U.S. Fish and Wildlife Service (FWS)	The Snake Island Unit of the refuge offers a variety of wildlife-dependent including wildlife watching and photography, hunting, and fishing as well as non-wildlife dependent activities (for example, boating, swimming, and picnicking). The refuge protects the grasslands and riparian forests on the Snake River islands. Facilities are limited on the islands to trails, signs, and informational kiosks.	51 acres (within Analysis Area)	NWR	225,000 annually.	High variety of recreation opportunities and wildlife habitat.	Offers somewhat rare opportunity for a high variety of recreational opportunities including boat access to islands.	Somewhat irreplaceable due to the variety of recreation opportunities, including opportunities for boating to river islands.	Yes (based on designation, rareness, use level, and replaceability)
Oregon Trail ACEC – Birch Creek SRMA	Bureau of Land Management (BLM), Vale District	119-acre parcel surrounding a segment of the Oregon National Historic Trail that was used as a camping area where before coming to the Snake River at Farewell Bend. Features at the site include an interpretive center, parking turnout, a wagon rut swale within a fenced exclosure, a short trail adjacent to the ruts, and interpretive panels. The area is also an ACEC with historic and scenic relevant and important values.	119 acres	SRMA (and ACEC)	Use data not found in search; assumed light due to lack of facilities and remoteness.	Good opportunity to view the Oregon National Historic Trail in a natural appearing setting.	Somewhat rare due to the presence of Oregon National Historic Trail ruts.	Irreplaceable due to the presence of Oregon National Historic Trail ruts.	Yes (Based on designation status, rareness, and irreplaceability)
Oregon Trail ACEC – Tub Mountain SRMA	BLM, Vale District	5,902-acre parcel surrounding a segment of the Oregon National Historic Trail that was the primary route from Vale to Farewell Bend. There is one interpretive site at Alkali Springs, which was the "nooning" spot for wagon trains leaving Vale. The area is also an ACEC with historic, cultural, and scenic relevant and important values.	5,902 acres	SRMA (and ACEC)	search; assumed light due to lack of facilities and remoteness.		Somewhat rare due to the presence of Oregon National Historic Trail ruts.	Irreplaceable due to the presence of Oregon National Historic Trail ruts.	Yes (Based on designation status, rareness, and irreplaceability)
Owyhee River Below the Dam SRMA and ACEC (BLM 2002)	BLM, Vale District	Area coincides with ACEC of the same name and incorporates Lower Owyhee River Watchable Wildlife Area and the Snively Hot Springs, located southeast of Adrian and downstream from Owyhee Dam in Malheur County.	11,239 acres	SRMA (and ACEC)	Light to moderate, depending on site; 8,200 visitors at Snively Hot Springs and 9,600 at interpretive site in 1997.	River corridor includes high-quality scenery and provides excellent opportunities for sightseeing/driving for pleasure, hiking/walking, viewing wildlife and historic resources, photography, hunting, fishing, camping, and water play. SRMA includes the existing Lower Owyhee Interpretive Site and the Snively Hot Springs partially developed recreation site. Unusual combination of desert canyon and river scenery, and accessibility.	Canyon scenery and variety of opportunities are uncommon.	Irreplaceable, based on river and canyon.	Yes (Based on designation status, unusual quality of opportunities, rareness and lack of replaceability)

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			3	Importance Factors					
Recreational Opportunity (Reference Sources)	Responsible Entity	Description	Area	Designation or Management	Demand	Qualities	Rareness	Replaceability	Important Opportunity?
Blue Mountain Forest State Scenic Corridor (OPRD 2022)	Oregon Parks and Recreation Department (OPRD)	Linear area, with three discontinuous parcels, along the former Old Oregon Trail Highway (old U.S. 30, parallel to I-84) between Deadman's Pass and Spring Creek in Umatilla and Union counties. Corridor designated to protect area of mature evergreen forests. Day-use only, with facilities limited to a designated viewpoint.	Approx. 9 miles long, 990 acres	State Scenic Corridor	Joint use with travel on old U.S. 30; count not reported in Oregon highway counts, but use level	Corridor area includes intermittent stands of old-growth pine, larch, spruce and fir, plus other native plants and animals. Landscape somewhat typical for Blue Mountain region, but unusual for I-84 corridor.	One of five state scenic corridors in eastern Oregon. Rare example of mature conifer forest along I-84 between the Dalles, OR, and Ogden, UT. Uncommon recreational opportunity focused specifically on scenic driving.	Irreplaceable, based on age and character of vegetation community.	Yes (Based primarily on designation status, rareness, and lack of replaceability)
Farewell Bend SRA (OPRD 2022)	OPRD	Moderate-sized state park system unit with overnight and day-use facilities on shoreline of Snake River/Brownlee Reservoir. Access is via U.S. Highway 30, near I-84 and Huntington.	86 acres	SRA	Use data not found in search; assumed to be high, based on large capacity and mix of facilities.	sites (91 utility sites with electricity and water and 30 tent sites); restrooms with flush toilets, hot showers, potable water. Separate hiker/biker camp area, group tent camp and two cabins. Dayuse and support facilities include large picnic area, boat ramp, wastewater	One of 12 OPRD	Somewhat irreplaceable, based on supply of comparable sites.	Yes (Based primarily on designation status, capacity/use level, development/ attraction qualities and rareness)
Hilgard Junction State Park (OPRD 2022)	OPRD	Park with overnight and day-use facilities in wooded area along Grande Ronde River in Union County, adjacent to Oregon 244 interchange with I-84.	1,083 acres	State Park	Use data not found in search; assumed moderate, based on capacity and accessibility.	have restrooms with flush toilets, potable water, horseshoe pit, Oregon Trail interpretive display. Site provides river access for fishing, rafting and swimming. Unusual in terms of level of	One of 12 OPRD developed recreation sites with camping facilities in eastern Oregon, including six on streams. Uncommon opportunity.	Somewhat irreplaceable, based on limited supply of comparable sites.	Yes (Based primarily on designation status, development/ attraction qualities and rareness)
Lindsay Prairie Preserve / SNHA	Nature Conservancy	Small preserve with bluebunch wheatgrass and Sandberg's bluegrass dominating the grassland, a habitat type now extremely rare in the Columbia Basin. The preserve also contains high-quality examples of three other Columbia Plateau native shrubland and grassland habitats, as well as diverse wildlife. Activities include hiking and wildlife viewing. There are no designated trails.	387 acres	SNHA		Bluebunch wheatgrass and Sandberg's bluegrass dominate the grassland, a habitat type now extremely rare in the Columbia Basin due to highly productive dryland wheat farming and other agriculture.  The preserve also hosts high-quality examples of three other Columbia Plateau native shrubland and grassland communities involving downey wheatgrass, needle-and- thread grass, big sagebrush, and bitterbrush.	Includes rare grassland habitat. Type of recreation opportunity is common.	Recreation opportunity is replaceable due to similar terrain available on public lands.	No (based on low use level, common and replaceable recreation opportunity)
Oregon Trail Interpretive Park at Blue Mountain Crossing (USFS 2022)	U.S. Forest Service (USFS), Wallowa- Whitman National Forest	Small USFS developed facility oriented to Oregon Trail interpretation and experience. Located within I-84 corridor northeast of La Grande in Union County.	16 acres	Site includes part of National Historic Trail		picnic area with shelter, restrooms, potable water, a paved accessible trail, two unpaved loop trails, and interpretive displays at the trailhead and along the trails. Evidence of historic Oregon Trail use and a	Site is one of several in eastern Oregon with Oregon Trail evidence and interpretation; forested setting differs from most other similar sites. Uncommon opportunity.	Irreplaceable, based on Oregon Trail evidence.	Yes (Based on designation status, rareness, and lack of replaceability)

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						Importance Factors			
Recreational Opportunity (Reference Sources)	Responsible Entity	Description	Area	Designation or Management	Demand	Qualities	Rareness	Replaceability	Important Opportunity?
Morgan Lake Park (City of La Grande 2013, 2022, undated)		City park with overnight and day-use facilities on a small reservoir 3 miles southwest of La Grande in Union County.	204.5 acres	City Park; Wildlife Refuge (City of La Grande undated)	Assumed moderate, based on capacity.	Site has 12 picnic tables and 5 barbecue pits, restroom, boat launch, floating dock, fishing piers. Opportunities for camping, picnicking, fishing, swimming and walking. Considered a regional park. Unusual setting and facilities for a municipal park resource.	One of 11 La Grande city park facilities; only one located outside of town and with camping. Uncommon opportunity close to a sizable community.	Somewhat irreplaceable, based on supply of comparable sites	Yes (Based primarily on unusual city park qualities and rareness)
Burnt River ERMA	BLM, Vale District	Area of public lands managed for recreation that are on or near improved gravel roads and located west of I-84 and Durkee.	42,210 acres	ERMA	search; assumed light	Excellent opportunities for fishing, water-based hunting, wildlife viewing and interpretation, camping and hiking in a scenic river canyon environment. Focus on water-oriented wildlife recreation opportunities.	Scope and variety of habitats is uncommon. Types of visitor opportunities are uncommon within the region.	Irreplaceable (based on effective ability to replace the habitats that create the recreational opportunities).	Yes (Based on designation status, unusual quality of opportunities, rareness and lack of replaceability)
Blue Bucket LDMA Camp (Gold Prospectors Association of America 2022)	LDMA-AU, Inc.	Privately owned property used by members for recreational gold prospecting and associated camping. Access is via Valentine Lane from I-84, Exit 335.	140 acres	None	Facility is currently open with limited capacity and is not open to public (approximately 5,000 members nationwide) and closed to general public, One similar property is located near Baker City, and 14 similar properties nationwide.	Camping use is secondary to recreational prospecting; some availability of electricity and water, with minimal other developed recreation facilities; property is crossed by Chimney Creek and 138, 69-kV lines, adjacent to I-84 and railroad. Substantially modified site with diminished attractiveness for recreation.	Apparently 1 of 14 similar properties available to LDMA members. One other property operated for similar purposes nearby, close to Baker City, Oregon.  Prospecting opportunities on public and other private lands are widespread. Common.	Replaceable. Numerous opportunities for prospecting in the area.	No (Based on low demand, lack of outstanding qualities, common opportunity, and replaceability)
Snake River Breaks ERMA	BLM, Vale District	Area of public lands managed for recreation, located between I-84 and the Brownlee Reservoir	10,903 acres	ERMA	search; assumed light	High variety of recreation opportunities and wildlife habitat supporting hunting and sightseeing in a primitive setting. Area includes one developed and 7 semi-developed campgrounds.	Scope and variety of habitats is uncommon. Types of visitor opportunities are uncommon within the region.	Irreplaceable (based on effective ability to replace the habitats that create the recreational opportunities).	Yes (Based on designation status, unusual quality of opportunities, rareness and lack of replaceability)
Weiser Dunes OHV Play Area	BLM, Vale District	Area adjacent to the Snake River, across the river from Farewell Bend SRMA encompassing 130 acres of sand dunes available for OHV use. Facilities area limited and include a pit toilet and an undeveloped camping area. There are no fees to use this recreation area.	130 acres	None	Use data not found in search; assumed moderate due to good accessibility and lack of facilities.	provides views toward the Snake River from the play area.	Somewhat rare to due to low number of accessible dunes for OHV use in the area.	Somewhat irreplaceable due to the limited supply of sand dune terrain on public lands.	Yes (Based primarily on the rareness and irreplaceability of this type of recreation opportunity and moderate use level)
Snake River Islands (Huffman Island) WA	Oregon Department of Fish and Wildlife	Wildlife management area with three islands (including Huffman Island) within the Snake River, east of I-84. Open for wildlife-oriented recreation, with various seasonal and access restrictions.	69 acres	WA	search; assumed light	Islands provide public hunting of pheasants, quail and waterfowl. Deer hunting is allowed with appropriate tags, and fishing for catfish or other warm water fish species also is allowed. The islands are open to the public year-round for bird and wildlife viewing.	Offers somewhat rare opportunity for a high variety of recreational opportunities including boat access to islands.	Somewhat irreplaceable due to the variety of recreation opportunities, including opportunities for boating to river islands.	Yes (based on designation, rareness, use level, and replaceability)
Bully Creek Reservoir	Malheur County Parks	Reservoir and park includes a boat ramp, store, campground and waterbased activities.	985 acres	None	Assumed high due to level of development.	Highly developed recreation site including boat ramp, store, campground and water-based activities. Both day-use and overnight use areas.	Yes, only fully developed county park in Malheur County.	Somewhat replaceable based on other reservoirs in the area.	Yes (Due to level of use, quality of facilities, and relative rareness of recreation opportunities in the area).

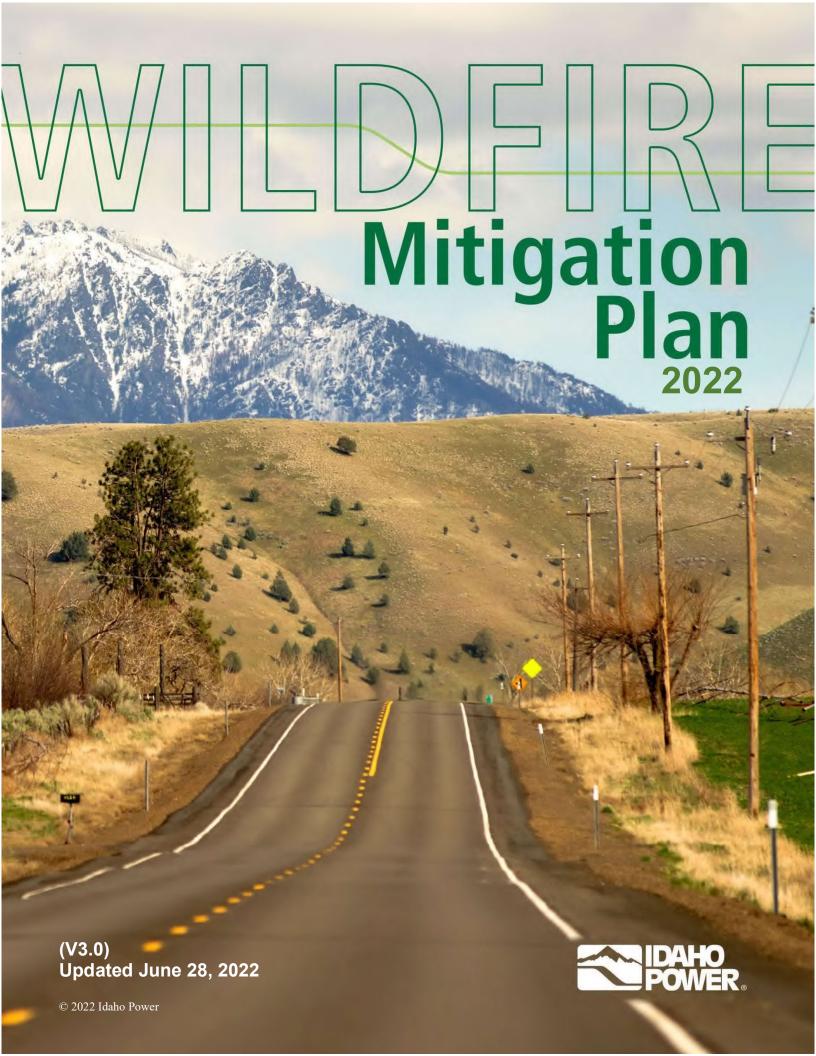
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0			3	Importance Factors					
	2000			Designation	3				No.
Recreational Opportunity	Responsible			or					Important
(Reference Sources)	Entity	Description	Area	Management	Demand	Qualities	Rareness	Replaceability	Opportunity?
Glass Hill Preserve/SNHA (Union County 2020, Union County 2021a)		Conservation easement that may allow public hunting and fishing by permission, located 1 mile southwest of La Grande in Union County. Confirmation of potential public access could not be confirmed with landowners, OPRD, or the Blue Mountain Conservancy. However, personal correspondence with Lindsey Wise, Oregon State University, Institute for Natural Resources has indicated that the area is likely restricted from public access (dated July 13, 2022).	1,728 acres	SNHA	search; assumed light due to lack of facilities and remoteness (Google Earth 2017, Union County 2021).	Good opportunity for hunting and fishing within a forested, wildlife managed area (if permitted, on all or a specific tax lot parcels). No formal, public facilities are likely provided per the designated zoning, A-4 Timber-Grazing Zone (Google Earth 2017, Union County 2021b).	opportunities available at	Recreation opportunity is replaceable due to similar terrain available on public lands.	No (Based on limited use, lack of facilities, lack of public access, common opportunity, and replaceability)

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## LIST OF APPENDICES

#### Appendix A

The Wildland Fire Preparedness and Prevention Plan.

#### Appendix B

The Public Safety Power Shutoff (PSPS) Plan.

# **Review/Revision History**

This document has been approved and revised according to the revision history recorded below.

Review Date	Revisions
Jan. 22, 2021	WMP Version 1 was filed with the Idaho Public Utilities Commission and posted to the Idaho Power website.
Dec. 29, 2021	Modifications including expanded cost-benefit discussion, plan progress and updates, and inclusion of Idaho Power's Public Safety Power Shutoff plan.
March 18, 2022	Added Appendix C.
June 28, 2022	Added information to comply with the Public Utility Commission of Oregon's conditions of approval of Idaho Power's 2022 Wildfire Mitigation Plan.

#### REGULATORY CONTEXT

As part of Idaho Power Company's (Idaho Power or company) commitment to deliver safe, reliable, and affordable energy, the company developed a comprehensive Wildfire Mitigation Plan (WMP) to reduce wildfire risk associated with its facilities. The WMP has three core objectives:

- 1. Reducing wildfire risk for the safety of Idaho Power's customers and the communities in which it operates.
- 2. Ensuring the continued and reliable delivery of electricity to more than 600,000 retail customers in Southern Idaho and Eastern Oregon.
- 3. Furthering the company's good stewardship of the beautiful and natural lands within Idaho Power's service area and beyond.

Idaho Power released its inaugural WMP in January 2021. The company's WMP is a living document that will evolve over time. Idaho Power will seek to review, modify, and expand the WMP in the coming years to reflect shifts in industry best practices and to ensure the company is following procedures and requirements established by its regulators. Given that Idaho Power operates in both Oregon and Idaho, below is a description of recent wildfire-related regulatory activities by state.

#### Idaho

On January 22, 2021, Idaho Power proactively filed its first WMP with the Idaho Public Utilities Commission (IPUC). The company's <u>application</u> provided a narrative of Idaho Power's effort to develop the WMP, including discussion of risk analysis across its service area and evaluation of specific wildfire mitigation activities (e.g., enhanced vegetation management and system hardening) the company would undertake in the coming fire season. Idaho Power asked the IPUC for authority to defer the Idaho jurisdictional share of incremental operations and maintenance expenses and capital depreciation expenses related to implementing the measures in the WMP, as well as incremental insurance costs.

On June 17, 2021, the IPUC issued Order No. 35077, granting the company's application and allowing cost deferral of all incremental wildfire mitigation and insurance expenses identified in Idaho Power's application.

#### Oregon

In August 2020, the Public Utilities Commission of Oregon (OPUC) opened an informal rulemaking related to mitigating wildfire risks to utilities, utility customers, and the public. The scope of this docket (AR 638) shifted following the 2020 wildfire season, splitting into two tracks—a temporary wildfire rulemaking to govern the 2021 wildfire season and a secondary track to establish replacement permanent rules for the 2022 fire season.

On July 19, 2021, Oregon Governor Kate Brown signed into law <u>Senate Bill 762</u> (SB 762), a wildfire bill that, among other actions, established minimum requirements for utility wildfire protection (or mitigation) plans. The bill required that utilities file inaugural plans no later than December 31, 2021.

In response to the passage of SB 762, the OPUC halted the permanent wildfire rulemaking in AR 638 and opened docket AR 648 to develop interim permanent rules adhering to the requirements and timing of the new law. The permanent rulemaking docket remains open to establish rules related to wildfire mitigation plan requirements for the 2023 wildfire season, as well as Public Safety Power Shutoff rules.

Below is a mapping of wildfire mitigation plan rules established in AR 648, per OPUC Order 21-440, to corresponding sections within Idaho Power's WMP.

Oregon Requirement	Corresponding Location in WMP
<ul> <li>(1) Wildfire Protection Plans and Updates must, at a minimum, contain the following requirements as set forth in Section 3(2)(a)-(h), chapter 592, Oregon Laws 2021 and as supplemented below:</li> <li>(a) Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are:</li> </ul>	See Section 3: Quantifying Wildland Fire Risk See Idaho Power website for details of wildfire risk zones outside of service territory
(A) Within the service territory of the Public Utility, and  (B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets.	See Section 3.2.2: Wildfire Risk Areas  See Figure 3: B2H Proposed Route Risk Zones
(b) Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.	See Section 4: Costs and Benefits of Wildfire Mitigation
(c) Identified preventative actions and programs that the Public Utility will carry out to minimize the risk of utility facilities causing wildfire.	See Section 5: Situational Awareness; Section 6: Mitigation—Field Personnel Practices; Section 7: Mitigation—Operations; Section 8: Mitigation—T&D Programs; and Section 8.3: T&D Vegetation Management
(d) Discussion of outreach efforts to regional, state, and local entities, including municipalities regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfires, promote the safety of the public and first responders and preserve health and communication infrastructure.	See Section 10.2 Idaho Power External Communications and Section 10.2.1: Community Engagement  See Appendix B: Idaho Power's Public Safety Power Shutoff Plan, Section 10.2.1: Coordination with Government Entities and Section 10.2.2: Community Preparedness
(e) Identified protocol for the de-energization of power lines and adjusting of power system operations to mitigate wildfires, promote the safety of the public and first responders and preserve health and communication infrastructure.	See Section 7.4: Public Safety Power Shutoff and Appendix B: Idaho Power's Public Safety Power Shutoff Plan
(f) Identification of the community outreach and public awareness efforts that the Public Utility will use before, during and after a wildfire season.	See Section 10: Communicating the Plan

Oregon Requirement	Corresponding Location in WMP
(g) Description of procedures, standards, and time frames that the Public Utility will use to inspect utility infrastructure in areas the Public Utility identified as heightened risk of wildfire.	For Transmission, see Section 8.2.1: Transmission Asset Management Programs (with information on aerial, ground, detailed visual, pole, and other protection programs)  For Distribution, see Section 8.2.2: Distribution Asset Management Programs (with information on visual, pole, and line equipment inspection programs)
(h) Description of the procedures, standards, and time frames that the Public Utility will use to carry out vegetation management in in areas the Public Utility identified as heightened risk of wildfire.	See Section 8.3.2: Transmission Vegetation Management and Section 8.3.3: Distribution Vegetation Management
(i) Identification of the development, implementation, and administrative costs for the plan, which includes discussion of risk-based cost and benefit analysis, including consideration of technologies that offer co-benefits to the utility's system.	See Section 4: Costs and Benefits of Wildfire Mitigation, specifically Section 4.3: Wildfire Mitigation Cost Summary and Section 4.4: Mitigation Activities
(j) Description of participation in national and international forums, including workshops identified in Section 2, chapter 592, Oregon Laws 2021, as well as research and analysis the Public Utility has undertaken to maintain expertise in leading edge technologies and operational practices, as well as how such technologies and operational practices have been used develop implement cost effective wildfire mitigation solutions.	See Section 2: Government, Industry, and Peer Utility Engagement

## 1. Introduction

#### 1.1. Background

In recent years, the Western United States has experienced an increase in the frequency and intensity of wildland fires (wildfires). A variety of factors have contributed in varying degrees to this trend including climate change, increased human encroachment in wildland areas, historical land management practices, and changes in wildland and forest health, among other factors.

While Idaho Power has not experienced catastrophic wildfires within its service area at the same level experienced in other western states, such as California and more recently certain areas in Oregon, millions of acres of rangeland and southern Idaho forests have burned in the last 30 years. In that same time period, the wildfire season in Idaho has expanded by 70 days. Idaho's wildfire season is defined by Idaho Code § 38-115 as extending from May 10 through October 20 each year, or as otherwise extended by the Director of the Idaho Bureau of Land Management (BLM). Oregon's wildfire season is designated by the State Forester each year pursuant to Oregon Revised Statute § 477.505 and typically begins in June. Idaho Power's operational practices account for the differences between Idaho and Oregon's wildfire seasons and requirements.

#### 1.2. Idaho Power Profile and Service Area

Idaho Power is an investor-owned utility headquartered in Boise, Idaho, engaged in the generation, transmission, and distribution of electricity. Idaho Power is regulated by the Federal Energy Regulatory Commission (FERC) and the state regulatory commissions of Idaho and Oregon. Idaho Power serves approximately 600,000 retail customers throughout a 24,000 square mile area in southern Idaho and eastern Oregon (see Figure 1).

<sup>&</sup>lt;sup>1</sup> Rocky Barker, 70% of S. Idaho's Forests Burned in the Last 30 Years. Think That Will Change? Think Again., Idaho Statesman, October 4, 2020.

<sup>&</sup>lt;sup>2</sup> Ibid.



Figure 1 Idaho Power service area

Of Idaho Power's 24,000 square mile service territory, approximately 4,745 square miles are located in Oregon and 19,255 in Idaho. Approximately 20,000 customers are served in Oregon and 580,000 in Idaho.

#### 1.3. Asset Overview

Idaho Power delivers electricity to its customers via more than 310 substations, 4,800 miles of overhead transmission lines, and 19,300 miles of overhead distribution lines. Table 1 summarizes the overhead powerline asset information by state.

Of Idaho Power's 24,000-square mile service territory, approximately 4,745 square miles are located in Oregon and 19,255 in Idaho. With regard to overhead powerlines, approximately 2,871 pole miles (12%) are located in Oregon and 21,042 (87%) are in Idaho.

**Table 1**Overhead transmission voltage level and approximate line mileage by state (Dec. 31, 2021)

ACCET	TOTAL	IDAHO		OREGO	OREGON		OREGON		OREGON		OREGON N		MONTANA		NEVADA		WYOMING	
ASSET	Pole Miles	Pole Miles	%	Pole Miles	%	Pole Miles	%	Pole Miles	%	Pole Miles	%							
46 kV Transmission Lines	383	383	100															
69 kV Transmission Lines	1,136	743	65	344	30	50	4											
115 kV Transmission Lines	3			3	100													
138 kV Transmission Lines	1,448	1,242	86	141	10			65	4									
161 kV Transmission Lines	84	84	100															
230 kV Transmission Lines	1,148	927	81	219	19													
345 kV Transmission Lines	473	364	77							110	2							
500 kV Transmission Lines	103	53	51	50	49													
Total OH Transmission Lines	4,778	3,796	80	757	16	50	1	65	1	110								
Total OH Distribution	19,297	17,183	89	2,114	11													
Total OH Pole Miles	24,075	20,979	87	2,871	12	50	0.21	65	0.27	110	0.4							

## 1.4. Objectives of this Wildfire Mitigation Plan

The primary objectives of this WMP are to identify and implement strategies to accomplish the following:

- 1. Reduce wildfire risk associated with Idaho Power's transmission and distribution (T&D) facilities and associated field operations.
- 2. Improve the resiliency of Idaho Power's T&D system in a wildfire event, independent of the ignition source.
- 3. Comply with all wildfire mitigation requirements established by its regulators.<sup>3</sup>

Idaho Power's approach to achieving these objectives includes the following actions:

- Engage with government and industry entities and electric utility peers to ensure understanding and commonality of wildfire mitigation plans.
- Utilize a risk-based approach to quantify wildland fire risk that considers *wildfire probability* and *consequence* to identify areas of elevated wildfire risk within Idaho Power's service area. These identified areas are then incorporated in Idaho Power's geographic information system (GIS) mapping.
- Create specific and targeted operations and maintenance practices, system hardening programs, vegetation management, and field personnel practices to mitigate wildfire risk.

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<sup>&</sup>lt;sup>3</sup> The OPUC established docket AR 648, the interim permanent wildfire rulemaking, after the Oregon legislature passed Senate Bill 762. The bill created a requirement for public utilities in Oregon to submit "wildfire protection plans" to the OPUC by December 31, 2021.

- Incorporate information regarding current and forecasted weather and field conditions into operational practices to increase situational awareness.
- Determine public safety power shutoff (PSPS) protocols for Idaho Power's service area and transmission corridors.
- Evaluate the performance and effectiveness of strategies identified in this WMP through metrics and monitoring. The WMP and all its components will be reviewed prior to wildfire season each year.

#### 2. GOVERNMENT, INDUSTRY, AND PEER UTILITY ENGAGEMENT

### 2.1. Objective

Idaho Power recognizes the importance of engaging with federal, Idaho and Oregon State governments, and local governments as an integral part of mitigating wildfire risk. Idaho Power also recognizes the importance of engagement and outreach with respect to potential future PSPS events to minimize customer impact.

Idaho Power's wildfire mitigation plan and outage preparedness strategy includes specific activities to engage with key stakeholders to share information, gain feedback, and incorporate lessons learned. Peer utility engagement is crucial to ensure the company's efforts are informed by the best practices of its peers in Idaho and Oregon.

## 2.2. Government Engagement

Much of Idaho Power's service area extends over land managed by the BLM and U.S. Forest Service. Idaho Power engages with both agencies to share information and identify areas and activities that are mutually beneficial. For example, Idaho Power allowed for an extended firebreak along Highway 93 in Jerome County, Idaho, on its property to help with BLM wildfire mitigation initiatives.

Idaho Power is also a member of the Idaho Fire Board, which was initiated by the U.S. Forest Service. Membership is voluntary and currently includes the Forest Service, BLM, Federal Emergency Management Agency (FEMA), Idaho State Lands Department, Idaho Department of Insurance, Idaho Military Division, City of Lewiston, Idaho Power, and The Nature Conservancy in Idaho.

Idaho Power is actively engaged with both the IPUC and the OPUC with respect to wildfire mitigation activities. Idaho Power filed its WMP with the IPUC in 2021 and submitted the plan to the OPUC as part of the temporary wildfire rulemaking in AR 638. Idaho Power continues to participate in the OPUC's Oregon Wildfire and Electric Collaborative (OWEC) and in the ongoing permanent wildfire rulemaking (docket AR 638).

## 2.3. Industry and Peer Utility Engagement

Although Idaho Power relied on plans developed by several California utilities in drafting its own WMP, modifications were made to account for Idaho Power's considerably different risk profile. Additionally, Idaho Power participated in multiple workshops with San Diego Gas and Electric, Southern California Edison, Pacific Gas and Electric, Sacramento Municipal Utility District, and PacifiCorp. The company continues to engage with these utilities to learn about California's evolving practices.

In the Pacific Northwest, many utilities work collaboratively to understand and ensure commonality of their various wildfire mitigation plans, while accounting for the variation in each utility's unique service area. These utilities include Idaho Power, Avista Utilities, Portland General Electric, Rocky Mountain Power, Pacific Power, Chelan County Public Utility District, Puget Sound Energy, NV Energy, Bonneville Power Administration (BPA), and Northwestern Energy.

Idaho Power is also a member of both the Edison Electric Institute (EEI) and the Western Electric Institute (WEI). The company participated in multiple workshops and conferences with both entities and member utilities to evaluate the strength and effectiveness of Idaho Power's WMP in comparison to other members' plans. Additionally, Idaho Power's CEO and President is an active member of the EEI Electricity Subsector Coordinating Council Wildfire Working Group. This working group has been partnering with the U.S. Department of Energy and other government agencies to collectively minimize wildfire threats and potential impacts.

These workshops continue to prove valuable for sharing wildfire mitigation best practices and discussing new and existing technology related to wildfire mitigation. For example, EEI and WEI workshops, as well as independent investigations, led Idaho Power to expand its use of Unmanned Aircraft Systems ([UAS] also known as drones) during line patrols, replace expulsion fuses with energy limiting fuses, and add mesh wraps to wood poles in wildfire risk zones. Idaho Power has also enlisted a team of employees to focus on wildfire mitigation technologies by identifying opportunities to incorporate new and innovative technologies into Idaho Power's wildfire mitigation efforts.

#### 3. QUANTIFYING WILDLAND FIRE RISK

### 3.1. Objective

Idaho Power's approach to quantifying wildland fire risk is to identify geographic areas of elevated wildfire risk if a wildfire ignites near a power line. Mitigation actions and programs are prioritized in those areas identified as elevated wildfire risk areas.

## 3.2. Identifying Areas of Elevated Wildfire Risk

Idaho Power hired an external consultant that specializes in assessing and quantifying the threat of wildfire through a risk-based methodology that leverages weather modeling, wildfire spread modeling, and Monte Carlo simulation. This methodology is not unique to Idaho Power's WMP. The California Public Utilities Commission (CPUC) used the same modeling approach (and in fact, the same consultant) in developing its CPUC Fire Threat Map. In addition, other utilities in Oregon, Idaho, Nevada, and Utah have utilized similar modeling to identify and quantify wildfire risk.

This methodology is consistent with conventional definitions of *risk*, which is usually taken as an event's *probability* multiplied by its potential negative *consequences* or impacts should that event occur. For Idaho Power's wildfire risk assessment, this formula is:

#### Wildfire Risk = Fire Probability x Consequence

The definition of each component is as follows:

<u>Fire Probability</u>. Fire volume (i.e., spatial integral of fire area and flame length) is used as Fire Probability because rapidly spreading fires are more likely to escape initial containment efforts and become extended fires than slowly developing fires. Data inputs used in the fire spread model to determine the fire volume (Fire Probability) include:

- Historical weather (temperature, wind speed/direction, relative humidity)
- Topography
- Fuel types present
- Fuel moisture content (both dead and live fuels)

<u>Consequence</u>. Number of structures (i.e., homes, businesses, other man-made structures) that may be impacted by a wildfire.

<u>Wildfire Risk</u>. Fire Probability multiplied by the Consequence. The highest Wildfire Risk areas are those where both the Fire Probability and Consequence are elevated. Conversely, combinations of low Fire Probability and elevated Consequence, or elevated Fire Probability and low Consequence typically indicate lower Wildfire Risk.

#### 3.2.1. Wildfire Risk Modeling Process

The wildfire risk modeling process incorporated the following major steps:

- 1. A 20-year (2000–2019) fire weather climatology was developed utilizing the Weather Research and Forecasting (WRF) model to recreate historical days of fire weather significance across Idaho Power's service territory. This analysis generated high-resolution hourly gridded fields of relative humidity, temperature, dead fuel moisture, and wind speed/direction that was used as input to a Monte Carlo-based fire modeling analysis.
- 2. Estimates of seasonal variation in live fuel moisture across Idaho Power's service territory were developed. This was accomplished by analyzing historical fuel measurements and/or weather station observations. This step was necessary because live fuel moisture data is needed for fire spread modeling, but the WRF weather model does not provide live fuel moistures.
- 3. The federal LANDFIRE program was utilized to provide high-resolution (approximately 100 feet) fuel rasters for use in fire spread modeling.<sup>4</sup>
- 4. The data developed above (WRF climatology, live fuel moisture, and LANDFIRE data) was used to drive a Monte Carlo<sup>5</sup> fire spread modeling analysis. This Monte Carlo simulation was accomplished by randomly selecting an ignition location and a randomly selected day from the fire weather climatology developed in step 1 above. Ignition locations were limited in the model to be within a two-kilometer buffer surrounding Idaho Power's overhead T&D lines (i.e., 1 kilometer on either side). Note that transmission lines jointly owned by Idaho Power and PacifiCorp were included in the analysis. Furthermore, the proposed Boardman-to-Hemingway (B2H) 500 kilovolt (kV) line route was also included in this analysis. For each combination of ignition location and time of ignition, fire progression was then modeled for 6 hours. For each modeled fire, potential fire impacts to structures were quantified using structure data. This was repeated across Idaho Power's service territory for millions of combinations of ignition location and time of ignition.
- 5. The Monte Carlo results were processed, and GIS based data depicting fine grained wildfire risk was developed. This risk was then visually depicted on GIS based wildfire risk maps.

<sup>&</sup>lt;sup>4</sup> Chris Lautenberger, Mapping areas at elevated risk of large-scale structure loss using Monte Carlo simulation and wildland fire modeling. IAFSS 12th Symposium 2017.

<sup>&</sup>lt;sup>5</sup> Ibid.

#### 3.2.2. Wildfire Risk Areas

Based on the previously described modeling, draft risk tiers were generated algorithmically <sup>6</sup> by establishing threshold values which, if exceeded, would classify an area as Tier 2 or Tier 3. To aid in customer and public understanding, Idaho Power also color-coded the tiers to reflect relative risk—Yellow Risk Zones (YRZ) for Tier 2 and Red Risk Zones (RRZ) for Tier 3. This was accomplished by manually setting threshold values at naturally occurring breaks. Consequently, the resulting risk tiers reflect risk relative to Idaho Power's service territory only and not absolute risk. As set forth later in this plan, Idaho Power's risk profile is significantly lower than utilities serving California.

An integral part of the consultant's mapping process involved reviewing the tiers and making necessary adjustments to account for unique aspects of certain areas, including factors that may increase or decrease risk, which would not be accounted for in the computer modeling. Several factors were considered, including the following:

- Topography and resistance to fire control
- Means of ingress and egress
- Presence/absence of defensible space
- Vulnerable populations
- Cell phone coverage
- Non-burnable land cover such as built-up urban areas

Below, Table 2 provides a breakdown of pole miles in risk zones on a system-wide basis and by state. Across Idaho Power's service area, 8% of pole miles exist in elevated risk zones (either RRZs or YRZs). In Idaho, 5% of pole miles exist in YRZs and 3% exist in RRZs. In Oregon, less than 1% of pole miles exist in YRZs. The company has no RRZs in Oregon.

Idaho Power's Transmission and Distribution Lines by Risk Zone in Idaho and Oregon

ASSET	ASSET		TOTAL IN V	O'FIG.	YELLOW F	Delan Con	RED RIS ZONES - ID		YELLOW I	2000	RED RIS ZONES - OR	
W. Santa		Pole Miles	Pole Miles	%	Pole Miles	%	Pole Miles	%	Pole Miles	%	Pole Miles	%
Transmis	sion Lines	4,841	511	11	371	8	110	2	21	0.43	0	0
Distribu	tion Lines	19,297	1,414	7	808	4	577	3	29	0.15	0	0
Total P	ole Miles	24,138	1,925	8	1,179	5	687	3	50	0.21	0	0

<sup>&</sup>lt;sup>6</sup> Ibid.

The final two-tier risk map reflecting relative increased risk in YRZs and RRZ is shown in Figure 2. The map is the foundation of Idaho Power's wildfire mitigation and risk reduction strategies. It is used to determine and prioritize targeted investments, inspection activities, and increase situational awareness for field personnel.

The <u>risk zone map</u> can be viewed in detail on Idaho Power's website. Individual addresses can be entered on the map to determine proximity to identified risk zones.

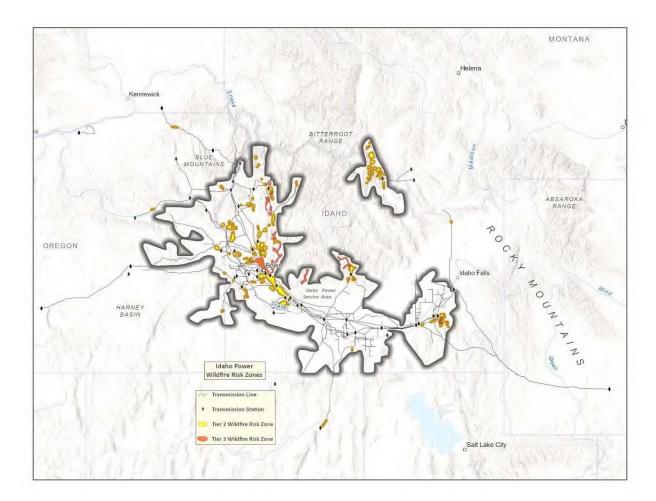
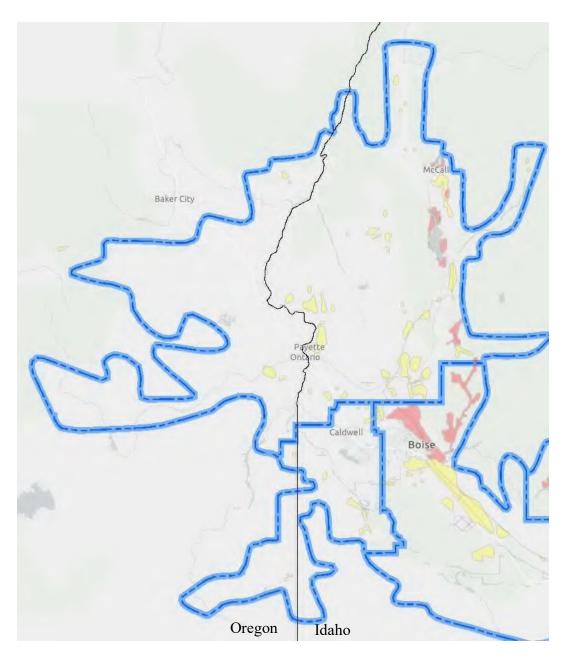


Figure 2
Wildfire Mitigation Plan—Risk Map

Additionally, Figures 3 through 6 delineate risk zones in Idaho and Oregon.



**Figure 3**Wildfire Risk Map—western Idaho and eastern Oregon

### Halfway



### Vale



### Idaho-Oregon Boarder

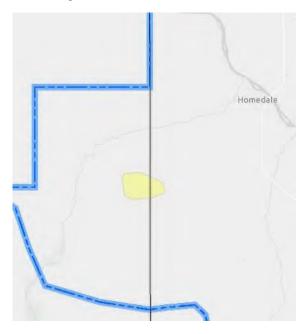
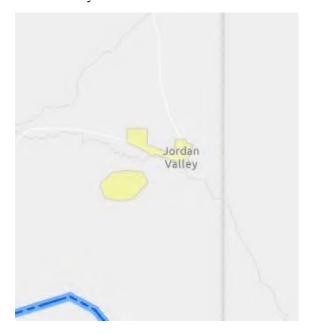
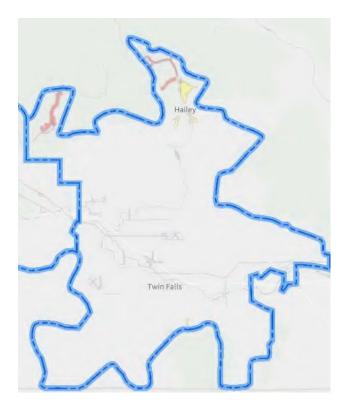


Figure 4
Oregon-specific zones

### Jordan Valley





**Figure 5**Wildfire Risk Map—southern Idaho

### Pocatello



#### Salmon

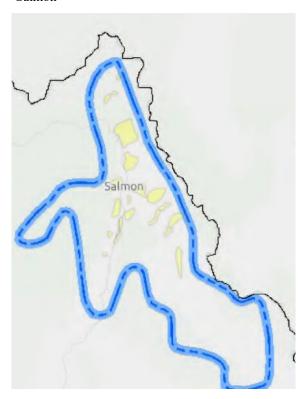


Figure 6 Wildfire Risk Map—eastern Idaho

### 3.2.2.1. Boardman to Hemingway Proposed Transmission Line

Idaho Power specifically considered the proposed route of the B2H 500 kV transmission line as part of the WMP. The proposed B2H route was included in the wildfire risk assessment and associated map analysis (see Figure 3). Two locations are identified along the route as having increased wildfire risk (YRZs), and there were no areas of higher risk (RRZs). Although the B2H transmission line has not been constructed as of the publication of this 2022 WMP, Idaho Power intends this WMP (as it will be reviewed annually) will apply to B2H. Additionally, Idaho Power will continue to update its fire risk mapping periodically and address the locations with elevated risk consistent with the mitigation strategy for transmission lines as described in sections 5–9 of this WMP.



**Figure 7** B2H proposed route risk zones

### 4. COSTS AND BENEFITS OF WILDFIRE MITIGATION

# 4.1. Objective

This section details Idaho Power's assessment of high-level risk with respect to undertaking wildfire mitigation activities. This assessment provides a framework for understanding the potential consequences of wildfire damage and the possibility of diminishing those consequences through targeted mitigation activities.

To that end, Section 4.3 identifies selected mitigation activities and the estimated costs of those activities on a system level. In Section 4.4, each mitigation activity is discussed in detail, with an assessment of why it was selected, what alternatives (if any) may be available, and any additional benefits (referred to as "co-benefits") the company believes may result from pursuing it. For each mitigation activity, costs have been estimated for Idaho and Oregon.

# 4.2. Risk-Based Cost and Benefit Analysis of Wildfire Mitigation

In assessing the probability and consequence of wildfire risk, and to identify benefits of various wildfire mitigation efforts, Idaho Power engaged with its external consultant and considered several sources of empirical data on the costs of major wildfires—both in terms of fires that burn into Idaho Power's facilities or that originate from electric infrastructure. These costs can include replacement costs of the company's property; the cost of fire suppression and environmental damage; third-party claims for property damage; employee and public injuries and fatalities; and other economic losses.

Through its research, Idaho Power found that obtaining a precise calculation of the potential costs of future wildfires is not realistic. The damage that any fire may cause depends on factors such as wind and weather, vegetation, fire risk levels, location, and population and structure density.

Idaho Power's assessment of the potential costs of wildfires—used in developing the WMP and the scope of proposed updates to practices—involved a review of prior major fires in other states, as well as calculations by other western utilities. While this assessment did not yield a precise quantification of potential benefits specific to Idaho Power, it provides a helpful illustration of the potential costs of not taking actions aimed at reducing wildfire risk.

Idaho Power reviewed and considered calculations analyzing the potential reduction in probability of igniting wildfires based on risk-mitigating activities. For instance, in a June 2020 filing before the IPUC, Avista Corporation (Avista) stated that its "analysis indicates a 10-year inherent potential risk exposure of at least \$8 billion dollars," though noted the figure should not

be interpreted as a precise financial estimate.<sup>7</sup> Avista further noted that the actions it proposes in its own wildfire resiliency plan result in an average percentage of risk mitigation of 89% for the overall plan.<sup>8</sup>

In California, costs and damages associated with wildfires in recent years have exceeded \$10 billion per year, with those associated with the 2020 fires alone potentially set to exceed \$20 billion. This increase is consistent with the fact that, with few exceptions, the prevalence, intensity, and impact of wildfires continues to escalate year after year as evidenced by information compiled by the California Department of Forestry and Fire Protection (CAL FIRE) and detailed in Table 3.

**Table 3**CAL FIRE Wildfire Data by Year

Year	Estimated Acres Burned	No. of No. of Confirme Wildfires Fatalities		No. of Structures Damaged or Destroyed
2020	4,197,628	9,279	31	10,488
2019	259,823	7,860	3	732
2018	1,975,086	7,948	100	24,226
2017	1,548,429	9,270	47	10,280
2016	669,534	6,954	6	1,274

The data compiled by peer utilities, historic fire costs, and known damage from prior fires are instructive. Considering peer metrics and analyses on probability and magnitude, as well as Idaho Power's own empirical review of wildfire events such as those in California and Oregon—and the resulting loss of lives—it is reasonable to conclude that the potential human and capital costs and damage from wildfire events vastly exceed any incremental costs of wildfire mitigation efforts identified in this WMP.

<sup>&</sup>lt;sup>7</sup> In the Matter of Avista Corporation's Application for an Order Authorizing Accounting and Ratemaking Treatment of Costs Associated with the Company's Wildfire Resiliency Plan, Case No. AVU-E-20-05, Application at 17.

<sup>&</sup>lt;sup>8</sup> Ibid.

<sup>&</sup>lt;sup>9</sup> Jill Cowan, *How Much Will the Wildfires Cost?*, The New York Times, Sept. 16, 2020, at https://www.nytimes.com/2020/09/16/us/california-fires-cost.html.

<sup>&</sup>lt;sup>10</sup> Idaho Power believes that its system is in notably better condition than some utilities in California. Nevertheless, these figures illustrate the destruction that can occur from vegetation contact if vegetation is not actively managed.

### 2023 Wildfire Mitigation Analysis Framework

Idaho Power plans to continue advancing its analytical approach to balancing cost and risk mitigation in its 2023 WMP. The company will evolve its risk analysis framework by building on the risk modeling detailed in its 2022 WMP and expanding its evaluation of risk reduction associated with present and future mitigation activities. The company's risk framework will seek to accomplish the following:

- Weigh the costs and potential benefits of alternative strategies to determine the most cost-effective wildfire mitigation solutions;
- Evaluate the effectiveness of current mitigation activities to determine whether those activities should be continued, refined, or replaced (e.g., analysis to determine circumstances in which underground line and facility conversions may be the optimal mitigation strategy compared to hardening overhead power lines); and
- Explore a range of risk management methodologies and expand the use of outage and fault analytics to further identify and refine areas for ignition reduction.

The company's cost and risk balancing framework will evolve over time and ultimately guide how it will identify, analyze, monitor, and address wildfire-related risk.

# 4.3 Wildfire Mitigation Cost Summary

From 2022–2025, Idaho Power estimates investing \$46.8 million in incremental operations and maintenance (O&M) expenses to further wildfire mitigation measures. The following table summarizes the company's planned expenditures associated with executing its WMP through 2025. Estimated amounts reflect the company's best estimates and plans as of the 2022 WMP. These estimates will likely change in the future as the company reviews and refines its WMP and associated mitigation activities. For the 2022 WMP, each wildfire mitigation category—and associated estimated expenditures in Oregon and Idaho—is discussed in Section 4.4.

Table 4
Estimated system-wide incremental O&M expenses for wildfire mitigation (2022–2025) 11

	2022		2023		2024		2025		2022 - 2025	
Quantifying Wildland Fire Risk			i.							
Risk Map Updates	\$		\$	67	\$	-	\$	69	\$	136
Situational Awareness									*	
Weather Forecasting - Fire Potential Index (FPI) and Public Safety Power Shutoff (PSPS) Personnel	\$	210	\$	220	\$	230	\$	241	\$	901
Weather Forecasting - System development and support	\$	10	\$	29	\$	55	\$	55	\$	149
Pole Loading Modeling & Assessment (Contract service)	\$	25	\$	75	\$	T	\$	2	\$	100
Cameras	\$	50	\$	55	\$	113	\$	50	\$	268
Mitigation - Field Personnel Practices										
Mobile Weather Kits for Field Observers	\$	20	\$	¥	\$	<b>*</b>	\$	-	\$	20
Tools/Equipment	\$	5	\$	5	\$	5	\$	5	\$	20
Mitigation - Transmission & Distribution Programs										
Wildfire Mitigaton Program Manager	\$	180	\$	185	\$	190	\$	195	\$	750
O&M Component of Capital Work	\$	54	\$	61	\$	60	\$	54	\$	229
Annual O&M T&D Patrol Maintenance Repairs	\$	50	\$	50	\$	50	\$	50	\$	200
Environmental Management Practices	\$	25	\$	25	\$	25	\$	25	\$	100
Transmission Thermography Inspection Mitigation - Red Risk Zones	\$	20	\$	20	\$	20	\$	20	\$	80
Distribution Thermography Inspection Mitigation - Red Risk Zones	\$	30	\$	30	\$	30	\$	30	\$	120
Thermography Technician Personnel	\$	155	\$	160	\$	165	\$	170	\$	650
Transmission Wood Pole Fire Resistant Wraps - Red Risk Zone	\$	88	\$	88	\$		\$	-	\$	176
Transmission Wood Pole Fire Resistant Wraps - Yellow Risk Zone	\$	163	\$	163	\$	163	\$	163	\$	652
Covered Wire Evaluation - Pilot Program in PSPS Zones	\$	25	\$	50	\$	50	\$	-	\$	125
Vegetation Management										
Vegetation Mgmt Incremental Expense to Transition to/Maintain 3- yr cycle Line Clearing Program	\$	8,087	\$	8,796	\$	9,547	\$	8,372	\$	34,802
Vegetation Distribution Red & Yellow Risk Zone: Pre-Fire Season Patrols/Mitigation, Pole Clearing, Removals, Work QA	\$	1,223	\$	1,284	\$	1,349	\$	1,416	\$	5,272
Line Clearing Personnel	\$	155	\$	159	\$	164	\$	169	\$	647
Communications										
Wildfire/Wildfire Mitigation Communications - Advertisements/Meetings/Other	\$	100	\$	100	\$	100	\$	100	\$	400
PSPS Customer Education/Communication - Advertisements, Bill Inserts/Other	\$	71	\$	71	\$	71	\$	71	\$	284
Information Technology										
Communication/Alert Tool development (System set up, outage maps, critical facilities identification)	\$	163	\$		\$		\$	5	\$	163
Communication/Alert Tool for PSPS Customer Alerts/Extended Use	\$	141	\$	129	\$	129	\$	129	\$	528
Forecast Incremental O&M Expenditures Total	\$	11,050	\$	11,822	\$	12,516	\$	11,384	\$	46,777

<sup>&</sup>lt;sup>11</sup> As of December 30, 2021.

# 4.4 Mitigation Activities

Idaho Power selected individual wildfire risk mitigation activities based on a variety of factors, including assessment of industry best practices in wildfire mitigation; discussions with peer utilities; consultation with government entities and agencies; and with consideration of alternatives that could be pursued.

Below is a narrative of each mitigation activity, its purpose, estimated near-term cost in Idaho and Oregon, potential co-benefits of the activity to Idaho Power and its customers, and potential alternatives.

With respect to Idaho and Oregon cost estimates, the estimated costs identified below are grounded in cost assignment between the company's Idaho and Oregon service areas and further informed by anticipated work in the two service areas.

# 4.4.1 Quantifying Wildland Fire Risk

Idaho Power's assessment of wildland fire risk is discussed in Section 3 of this WMP.

The first step in developing Idaho Power's WMP was to conduct a comprehensive assessment of the company's service area and transmission corridors. The company worked with Reax Engineering, a consulting firm that specializes in wildfire risk modeling and fire science, to conduct Idaho Power's wildfire risk analysis. The company determined that hiring an external consultant was beneficial for two reasons: (1) an external consultant was more cost effective than hiring additional resources within Idaho Power to perform the modeling, and (2) an outside consultant helped ensure Idaho Power's risk analysis approach was similar to its peer utilities.

An additional co-benefit of hiring an external consultant is aligning risk analysis with other utilities' practices to create a basis for comparison of risk and also a standard terminology and methodology in discussing risk. Idaho Power deemed Reax Engineering a qualified consultant to perform wildfire risk analysis based on the work it performed for the CPUC in developing the CPUC Fire Threat Map. Other utilities in Oregon, Idaho, Nevada, and Utah have utilized similar modeling approaches to identify and quantify wildfire risk.

Cost Estimate for Quantifying Wildland Fire Risk (2022–2025)

Idaho Power intends to re-evaluate its risk analysis using an external consultant on two more occasions between 2022 and 2025. Idaho Power estimates system-wide expenditure for these services to be approximately is \$136,000. To determine state-specific estimates, the company assigned a share based on the number of line miles in each jurisdiction.

Idaho estimated cost: \$119,000

• Oregon estimated cost: \$17,000

# 4.4.2 Situational Awareness—Fire Potential Index & Weather Forecasting

*Idaho Power discusses specific situational awareness practices in Section 5 of this WMP.* 

In developing the WMP, Idaho Power created a new Fire Potential Index (FPI) tool to support operational decision-making to reduce wildfire threats and risks. The tool takes data on weather, prevalence of fuel (i.e., trees, shrubs, grasses), and topography, and converts that data into an easily understood forecast of the short-term fire threat for different geographic regions in Idaho Power's service area. Additionally, Idaho Power plans to continue to enhance meteorological and weather forecasting capabilities to further improve FPI forecasting and help determine when a Public Safety Power Shutoff may be necessary in Idaho Power's service area.

The benefits of developing the FPI and enhancing the company's meteorological forecasting capabilities is greater situational awareness of Idaho Power's system during critical peak summer months. To continue to generate useful information and system benefits, Idaho Power's situational awareness activities will be evaluated and updated annually as necessary to support the company's wildfire preparedness.

The company considers the FPI and related efforts an essential part of reducing the risk of ignition from work activities. This provides Idaho Power field personnel would not have a tool to assess the fire potential on a consistent basis. Given the distinct benefits that result from the FPI and enhanced foresting capabilities, Idaho Power did not consider alternatives to the development of these critical tools.

Cost Estimate for Situational Awareness—FPI and Weather Forecasting (2022–2025)

The estimated expenditure for the FPI tool is \$901,000 and an additional \$149,000 for enhanced weather forecasting capabilities, for a system-wide total of \$1.1 million between 2022 and 2025. To determine state-specific estimates, the company applied its traditional jurisdictional separation amounts of 95% for Idaho and 5% for Oregon.

• Idaho estimated cost: \$998,000

• Oregon estimated cost: \$53,000

# 4.4.3 Situational Awareness—Advanced Technologies

Beginning in 2022, Idaho Power created a Technology Strategy Initiative team aimed at determining how new technologies and innovative practices can be incorporated into the company's wildfire mitigation practices to further decrease wildfire risk. Technology-based practices being considered include—amongst others—strategic use of cameras, satellite, and aerial imagery to detect vegetation hazards, pole loading modeling (to assess the structural integrity of poles), as well as covered conductors. With regard to cameras, the company is evaluating a pilot to test placement of cameras in strategic, high-risk locations to enhance situational awareness. Additionally, the company is learning more about artificial intelligence and how it can be leveraged to detect wildfire ignitions. Multiple camera and analytics

companies are being considered to determine potential cost-effective solution(s). The company is also working with local agencies to explore the possibility of partnering on the installation and ongoing use of cameras which may lead to reduced cost.

Cost Estimate for Situational Awareness—Pole Loading Modeling and Assessment (2022–2025)

The estimated system-wide expenditure to conduct pole loading modeling and assessment, which includes LIDAR assessment, is \$100,000 for 2022 through 2025. Idaho Power plans to conduct the assessment in its highest risk zones, which are located exclusively in Idaho as set forth in Table 2. Because there are no Red Risk Zones in the company's Oregon service area, all expenditures will occur in Idaho at this time.

Idaho estimated cost: \$100,000

• Oregon estimated cost: \$0

Cost Estimate for Situational Awareness—Cameras (2022–2025)

The estimated system-wide expenditure for the pilot evaluation installation of cameras in high-risk areas is \$268,000 for 2022 through 2025. Idaho Power plans to prioritize the use of cameras in its highest risk zones, which are located exclusively in Idaho as detailed in Table 2. Because there are no Red Risk Zones in the company's Oregon service area, there are no current estimated expenditures for cameras in Oregon.

• Idaho estimated cost: \$268,000

• Oregon estimated cost: \$0

### 4.4.4 Field Personnel Practices

Idaho Power discusses its field personnel practices in Section 6 of this WMP.

Idaho Power's wildfire mitigation strategy includes procedural measures to reduce potential ignition and spread of wildfires. Idaho Power developed a *Wildland Fire Preparedness and Prevention Plan* (included as Appendix A to this WMP) to provide guidance to Idaho Power employees and contractors. The plan includes information regarding fire season tools and equipment available on the job site; daily situational awareness relative to areas with heightened fire conditions; expected actions and mechanisms for reducing on-the-job wildfire risk as well as reporting requirements in the event of an ignition; and training and compliance requirements.

All Idaho Power crews, and certain field personnel and contractors performing work on or near Idaho Power's facilities are required to operate in accordance with the provisions of the *Wildland Fire Preparedness and Prevention Plan* and expected to conduct themselves in a fire-safe manner. They should be prepared for wildfire by carrying specific tools, including but not

limited to, shovels, Pulaskis, <sup>12</sup> and water for initial suppression. Additionally, Idaho Power's PSPS program (included as Appendix B to this WMP) includes employees acting as Field Observers to report on site conditions as part of the de-energization process. Field Observers are equipped with mobile weather kits that include wind meters, compasses, and satellite communication devices to report real-time conditions.

The preparedness of Idaho Power crews and contractors is critical to comprehensive wildfire risk reduction practices. The incremental investment in field personnel equipment is focused on additional tools carried by employees working in elevated risk zones.

Cost Estimate for Field Personnel Equipment (2022–2025)

The estimated system-wide expenditure for field personnel equipment (tools and mobile weather kits) is \$40,000 between 2022 and 2025. To determine state-specific estimates, the company applied its traditional jurisdictional separation amounts of 95% for Idaho and 5% for Oregon.

• Idaho estimated cost: \$38,000

• Oregon estimated cost: \$2,000

# 4.4.5 Transmission and Distribution (T&D) Programs for Wildfire Mitigation

Idaho Power's T&D-related wildfire mitigation activities primarily involve expanded asset management programs and system hardening efforts, discussed in detail in Section 8.2 of this WMP. The narratives below provide insight into Idaho Power's consideration and selection of certain mitigation and hardening practices.

### 4.4.5.1 Annual T&D Patrol, Maintenance, and Repairs

Visual inspections are a critical component of T&D line-related wildfire mitigation efforts. On an annual basis, Idaho Power uses helicopters for visual aerial inspection of transmission lines that are Western Electricity Coordinating Council (WECC) path lines. Under the WMP, Idaho Power will continue to use this method of line inspection for all transmission lines located in Red Risk Zones. Idaho Power strives to complete these inspections prior to the start of the wildfire season.

Distribution lines that are located within RRZs are inspected on an annual basis through detailed visual inspections. Helicopters are not practical for carrying out all distribution patrols due to greater population, structural, and vegetation density, so unmanned aerial vehicles (UAV) with high-definition cameras are used to aid in these inspections in certain situations. These inspections allow personnel to look for potential line defects that may not be obvious from

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<sup>&</sup>lt;sup>12</sup> A Pulaski is a hand tool specifically used for fighting fires that combines an axe and an adze atop a single handle. The tool is the invention of Edward Crockett Pulaski, a ranger with the U.S. Forest Service who was based in Wallace, Idaho, in the early 1900s.

the ground. "Priority 1" defects, or conditions that may result in an outage or potential ignition, are immediately reported and repaired as soon as possible.

The company will continue to explore the expanded use of UAVs, as the detailed images and data collected through high-resolution aerial inspections can provide several co-benefits, including more granular data on vegetation growth and line and facility conditions.

Cost Estimate for Annual T&D Patrol, Maintenance, and Repairs (2022–2025)

The estimated system-wide incremental expenditure for annual T&D patrols, maintenance, and repairs is \$200,000 from 2022 to 2025. To determine state-specific estimates, the company applied its traditional jurisdictional separation amounts of 95% for Idaho and 5% for Oregon.

• Idaho estimated cost: \$190,000

• Oregon estimated cost: \$10,000

### 4.4.5.2 Thermography Inspections

While Idaho Power periodically conducts infrared thermography inspections as part of reliability and maintenance programs, the company is expanding these inspections in Red Risk Zones on an annual basis. These inspections are conducted using hand-held and drone-mounted cameras with thermal-sensing technology and can help identify defects associated with the overheating of equipment, connections, splices, or conductors.

As part of the thermography inspections, temperature gradients are analyzed to detect potential problems and issues found are prioritized based on their severity and repaired. Idaho Power recently created a new Thermography Technician position to carry out the inspections and coordinate repair activities, and additional resources may be added to perform this function across more of Idaho Power's service area if a single technician proves insufficient. To prioritize the use and information gained from this technology, it will initially be employed only in RRZs. 2022 is the test year to determine how many inspections can be performed, and the overall cost-benefit of the technology to help evaluate the possibility of expanding use and adding more resources.

Thermography inspections are uniquely valuable in that they are able to uncover problems undetectable to the naked eye. From the company's perspective, there is not a viable alternative to this practice. The technology enables more proactive identification of potential issues than would otherwise be possible.

Cost Estimate for Thermography Inspections (2022–2025)

The estimated system-wide expenditure for thermography inspections is \$850,000 from 2022 to 2025. Idaho Power currently plans to prioritize the use of this mitigation practice in its highest risk zones. Because the company's Oregon service area does not have any Red Risk Zones, there is no estimated expenditure on thermography inspections there at this time.

Idaho estimated cost: \$850,000

• Oregon estimated cost: \$0

### 4.4.5.3 Wood Pole Fire-Resistant Wraps

To help improve the resiliency of the company's wood transmission poles, Idaho Power now wraps them with a fire-resistant mesh in Red and Yellow Risk Zones. The mesh wrap helps protect the integrity of the pole if it is exposed to fire and improves the resiliency of Idaho Power's transmission system. An alternative to installing fire-proof mesh wrap is to replace wood poles with structures made of non-combustible material, such as steel. With 3,863 existing wood transmission poles in Idaho Power's Red and Yellow Risk Zones, the cost of replacing all wood poles is much higher than the cost of covering with a fire-resistant mesh.

Prior to developing the WMP, Idaho Power evaluated different products to determine the most cost-effective approach for protecting existing wood poles from fire. Several products were considered and trialed, including short-term spray-on and paint-on fire retardants, long-term retardants, and steel wraps. In 2020, the company evaluated a protective mesh wrap and compared the cost and performance to the alternatives. The evaluation found that the mesh wrap was approximately 53% less costly than the alternatives and offered the same level of risk reduction. The decision to use a mesh wrap product was not based solely on cost; other criteria were considered, including availability of the product, ease of installation, expected protective life span, and performance when exposed to fire. By all these measures, fire-resistant mesh was the best solution.

Cost Estimate for Wood Pole Fire-Resistant Wraps (2022–2025)

The estimated system-wide expenditure for applying fire-resistant mesh wraps to transmission poles in Red and Yellow Risk Zones is \$828,000 between 2022 and 2025. To determine state-specific estimates, the company assigned a share based on the number of wood poles in each jurisdiction that are in elevated risk zones.

• Idaho estimated cost: \$789,000

• Oregon estimated cost: \$39,000

#### 4.4.5.4 Covered Conductor Pilot

Idaho Power's Technology Strategy Initiative identified covered conductor as a potential mitigation measure to pilot. Benchmarking and feedback from other utilities highlighted the potential benefit of covered conductor as a mitigation measure. The company will conduct a pilot of covered conductor in 2022 through 2024 to explore the benefits, tooling requirements for field personnel, and design parameters. While covered conductor may reduce the risk of wildfire, the company will analyze potential co-benefits, including improved reliability outside of wildfire season and reduced outage restoration costs.

Cost Estimate for the Covered Conductor Pilot (2022–2024)

The estimated cost of the pilot is \$125,000 from 2022–2024. To determine state-specific estimates, the company applied its traditional jurisdictional separation amounts of 95% for Idaho and 5% for Oregon.

Idaho estimated cost: \$119,000

• Oregon estimated cost: \$6,000

# 4.4.6 Enhanced Vegetation Management

Idaho Power's enhanced vegetation management practices are discussed in detail in Section 8.3 of this WMP.

In the initial stage of developing its WMP, Idaho Power conducted an analysis to determine the most likely sources of ignition across the company's service area. Reliability data revealed vegetation contact as one of the most common causes of outages on Idaho Power's system. With the goal of eliminating potential ignition sources and to reduce risk, enhanced vegetation management was recognized as a critical aspect of Idaho Power's WMP.

To prioritize risk reduction from vegetation contact, Idaho Power determined it would move to a three-year pruning cycle and apply enhanced vegetation management practices in Red and Yellow Risk Zones. These enhanced practices include pre-fire season vegetation patrols, more targeted pole clearing and vegetation removal, and additional quality assurance for vegetation management practices.

The company considered other vegetation management alternatives, including shorter trimming cycles, longer trimming cycles, and strategies that evaluate each tree individually and only trim it once it has nearly grown back to the power line (known as "just-in-time trimming"). Each alternative presented challenges or resulted in negative impacts that undermined any potential benefits.

While shorter trimming cycles result in less vegetation being removed during each trimming cycle, this practice costs more due to the need for more resources and more frequent trimming of trees near the power lines. In contrast, longer cycles result in less frequent trimming of each tree but larger amounts of vegetation that must be removed to maintain larger clearance envelopes around the power lines to accommodate additional years of vegetative growth. Further, longer trimming cycles create logistical challenges that are exacerbated by tree biology. Some trees simply grow faster than a given trimming cycle and the longer the trimming cycle, the more pervasive this issue becomes. Longer cycles that call for heavy pruning also lead to hormonal imbalances between a tree's canopy and its root system. To correct this imbalance, the tree aggressively re-grows new sprouts to quickly replace its lost canopy. In this regard, heavier pruning results in a faster rate of tree regrowth than normal, making it even more difficult to consistently maintain longer trimming cycles. Finally, "just-in-time trimming" is primarily a reactive strategy that ultimately leads to challenges associated with securing qualified tree-trimming crews, as this ad hoc approach involves hiring crews on an as-needed basis rather

than on a consistent schedule. After evaluating these alternative approaches, Idaho Power concluded that the goal of maintaining a consistent three-year trimming cycle is the most cost-effective and sustainable strategy to keep vegetation away from the power lines in a proactive manner.

Moving forward with a three-year cycle and performing the additional activities detailed above will involve a sizeable increase in incremental O&M expenditure: approximately \$8 million annually. An alternative to enhancing Idaho Power's vegetation management program is to convert overhead distribution circuits to underground. While undergrounding is used in certain circumstances, undergrounding has generally not been determined to be a cost-effective expense relative to enhanced vegetation management. That said, the company continues to evaluate and implement underground solutions, as appropriate, as part of its WMP hardening efforts detailed below.

Although vegetation management is a sizeable increased wildfire mitigation expense, performing this work is expected to have notable co-benefits, including reduced vegetation-caused outages in Red and Yellow Risk Zones. Idaho Power plans to monitor performance and outage metrics to confirm the success of the enhanced program.

Decreasing vegetation outages was considered one of the most important, cost-effective measures Idaho Power could take to reduce the likelihood of an ignition event and protect utility infrastructure. Shifting vegetation management practices was deemed a prudent course of action based on the number of potential outages or ignition sources that may be eliminated. It is also the approach that has been adopted by many of Idaho Power's peer utilities.

Cost Estimate for Enhanced Vegetation Management (2022–2025)

The estimated system-wide expenditure for enhanced vegetation management is \$40.7 million from 2022 to 2025. Because vegetation management contracts are based on the company's system-wide needs and not separated by state, the company determined state-specific vegetation management estimates by applying its traditional jurisdictional separation amounts of 95% for Idaho and 5% for Oregon.

• Idaho estimated cost: \$38.7 million

• Oregon estimated cost: \$2 million

#### 4.4.7 Communications and Customer Notification Enhancements

Idaho Power's efforts to communicate with customers and the public about wildfire and mitigation are discussed in detail in Section 10 of this WMP.

Idaho Power considers communication a vital part of its wildfire mitigation efforts. Customer and public awareness and education are a vital part of ensuring that the communities that Idaho Power serves are protected and safe from the threat of wildfire. New communication expenses related to customer and community educational outreach include advertisements, printed media, social media, and public meetings. The purpose of these communications is to

keep customers aware of mitigation and fire-related activities before, during, and after fire season. Additionally, the company is building out communication systems to be able to alert customers more quickly and easily about wildfire events and outages, including potential PSPS events.

Cost Estimate for Communication and Customer Notification Enhancements (2022–2025)

The estimated system-wide expenditure for communication expenses is \$400,000 and \$691,000 for customer notification system enhancements, totaling \$1.1 million from 2022 to 2025. To determine state-specific estimates, Idaho Power applied its traditional jurisdictional separation amounts of 95% for Idaho and 5% for Oregon.

Idaho estimated cost: \$1.04 million

• Oregon estimated cost: \$54,600

# 4.4.8 Incremental Capital Investments

Idaho Power's wildfire mitigation efforts include capital investments in system hardening practices including approaches deployed after internal testing and analysis, many of which also provide co-benefits to the company.

Idaho Power's capital investments for wildfire mitigation are discussed in detail in Section 8.2 (T&D Asset Management Programs) of this WMP.

### 4.4.8.1 Circuit Hardening and Infrastructure Upgrades

Idaho Power estimates spending \$5.1 million annually through 2025 on circuit hardening and infrastructure upgrades across its system.

Idaho Power's WMP includes an overhead distribution hardening program for Red Risk Zones. The program includes systematic replacement of hardware, equipment, and materials to improve safety and reliability and reduce ignition risk. The first five years of the program are focused on circuits in Red Risk Zones, but it may be expanded to Yellow Risk Zones in the future. The company will review hardening outcome metrics annually to determine the benefit of the program and to determine whether to expand the program after 2025.

Prior to developing its WMP, Idaho Power successfully implemented many of the same hardening measures detailed below as part of the company's reliability program. Outage data and analytics showed that customer outages were reduced by approximately 38% in areas where hardening projects were carried out. With the success of reducing outages, some of these same activities to increase reliability were chosen to be part of the WMP to help reduce ignition potential in Red Risk Zones. Enhanced system hardening efforts include installation of fire safe fuses, Spark Prevention Units, and fiberglass crossarms.

All the hardening activities and equipment identified in this program were evaluated by patrolmen, troublemen, reliability engineers, and the company's Methods and Materials

department to determine cost-effective solutions that balance overall costs with expected risk reduction.

As an alternative to conducting circuit hardening upgrades, the company considered converting overhead distribution circuits to underground. While underground conversions are used in certain circumstances, the cost is estimated to be 2–10 times higher than the cost of carrying out hardening work. In general, overhead hardening efforts provide the benefit of being able to impact a greater number of circuit miles and customers in a shorter time horizon with less investment than undergrounding. Idaho Power will continue to evaluate underground opportunities as part of overall system hardening efforts.

The following summarizes the incremental capital investments the company is making to harden its system and further reduce wildfire risk:

- Wood Pole Replacement—The company will replace wood poles if field evaluations determine that significant deterioration or damage has occurred since the last inspection or treatment. Poles are inspected above the groundline to determine strength and climbability. Poles identified as "rejects" will be replaced on an expedited basis. Furthermore, poles having wood stubs/structural reinforcements are changed out pursuant to current practices.
- Fuse Replacements—Expulsion fuses located in Red Risk Zones will be changed out with energy-limiting and power fuses. Fuse applications include overhead transformers, line taps, risers, and capacitor banks. In 2018, Idaho Power began exploring different fusing technology to replace expulsion fuses with non-expulsion fuses. Three different fuse types were considered and subsequently piloted. The pilot was used to determine the performance of each fuse type, installation requirements, and coordination characteristics. Financial analysis included the cost of each fuse along with associated cutout and hardware and helped determine the most cost-effective option. This information was used to evaluate non-expulsion fuses. Replacement of all expulsion fuses in Red Risk Zones is expected to take approximately three years at a cost of approximately \$1.9 million. Because this work will be conducted in Red Risk Zones, the company does not anticipate replacing fuses in Oregon at this time.
- Spark Prevention Units—Porcelain arresters used for overvoltage protection will be changed out with arresters utilizing Spark Prevention Units (SPU). The SPU acts to eliminate the potential of catastrophic failure during arrester operation. This work includes all distribution arresters located on primary distribution lines in Red Risk Zones. In 2019, Idaho Power piloted new arrester technology to determine performance characteristics, installation requirements, and potential benefits in reducing ignition risk. As part of the pilot, Idaho Power compared different manufacturers with similar technology and conducted performance analysis to determine the most cost-effective solution. Replacement of the arresters is expected to take approximately three years to complete and will cost approximately \$1.7 million. Because this work will be conducted in Red Risk Zones, the company does not anticipate replacing arrestors in Oregon at this time.

- Fiberglass Crossarms—Idaho Power began piloting fiberglass crossarms in 2018 to determine potential cross-functional benefits associated with fiberglass. The pilot focused on cost, ease of installation, strength, supply availability, and reduced potential for tracking of electrical current. Tracking is known as the flow of current over an insulator, which can generate heat. The company compared different crossarm types and manufacturers and determined that fiberglass was most cost effective when considering up-front capital and installation costs. The pilot program, along with benchmarking of peer utilities, helped determine that fiberglass crossarms provided a number benefits relative to improved safety and reliability. Therefore, Idaho Power's hardening program includes the installation of both tangent and dead-end fiberglass crossarms in Red Risk Zones. However, Idaho Power does not intend to replace all wood crossarms with fiberglass immediately. As part of the fielding phase, company distribution designers will assess wood crossarms and initially change those showing signs of defects or damage. Identified crossarms utilizing wood pins will also be replaced with fiberglass. This approach will spread the cost out over time and help reduce the upfront cost of the program.
- Small Conductor—In the early stages of developing the WMP, Idaho Power considered the possible risk associated with small conductor and the potential for breakage. As a result of this exercise, the company's WMP hardening program includes the replacement of overhead distribution conductor that meets certain criteria which includes approximately 60 miles in Red Risk Zones. Conductor losses were analyzed and showed that replacing the conductor will result in an approximately 50% reduction of line losses, resulting in co-benefits for the company and customers in terms of greater reliability and line loss improvements.
- Porcelain Switches—Idaho Power's Outage Management System and feedback from field personnel revealed potential benefits of switches made of material other than porcelain. Therefore, porcelain switches installed in Red Risk Zones will be changed out with cutouts featuring Ethylene Propylene Diene Monomer Rubber (EPDM). Idaho Power's Methods and Materials Department trialed different cutout switches made up of different material, including silicone and polymer, to determine the most cost-effective solution. The results of the trial highlighted the potential for avian issues with silicone (i.e., ravens tended to eat the silicone), and the cost of EPDM versus polymer was nearly equivalent. The financial analysis determined that EPDM would preserve the integrity of the insulator body, prevent outages, and provide an estimated savings of \$10,798 per year over silicone.
- Avian Protection—Idaho Power employs several different protection measures to protect wildlife on existing structures including but not limited to covers, insulated conductor, diverters, perches, nesting platforms, and structural modifications. The company has an extensive history working with manufacturers of animal guards/covers and regularly seeks new solutions for avian issues to prevent mortalities, increase reliability, and eliminate other risks. The company's Avian Protection Plan (APP) was developed in the mid-2000s and many of the practices identified in the APP are used for wildfire mitigation in Red and Yellow Risk Zones. For example,

new wildlife guards were recently developed and installed in conjunction with the installation of new power fuses and SPUs. Idaho Power consulted with different manufacturers to develop new products that would accomplish the dual goals of avian protection and wildfire mitigation. The best solution is determined on a case-by-case basis depending on the specific location, the type and extent of avian presence, and other relevant factors.

### 4.4.8.2 Overhead to Underground Conversions

Another aspect of Idaho Power's system hardening program is the select conversion of overhead to underground distribution lines in Red Risk Zones. In 2022, the company will convert 1.5 miles of overhead distribution lines to underground lines. In 2023 and beyond, the company will work to build a strategic undergrounding program to weigh the cost-benefit of undergrounding versus other circuit hardening measures. While underground distribution lines offer benefits associated with being less exposed to the elements and external forces, conversion may not be possible, advisable, or economical in certain situations. The company will continue to evaluate the feasibility of underground conversions as well as the relative value and cost effectiveness as part of the WMP.

#### 4.4.8.3 Transmission Steel Poles

In 2021 and as part of its WMP, Idaho Power revised its transmission construction standards to utilize steel poles and structures for new line construction built to 138 kV and above in elevated wildfire risk zones. This change is intended to minimize the potential for wildfire damage, improve transmission line resiliency, and increase reliability for customers. Wood poles continue to be accepted and used in the industry, and the company will still utilize wood poles in many transmission system applications in consideration of the specific engineering, right-of-way, permitting, and scheduling requirements for each project.

In addition, wood poles will continue to be the standard construction practice for transmission line voltages below 138 kV unless a different material is needed to meet specific engineering or planning requirements. As discussed above, Idaho Power will wrap wood poles located in Red and Yellow Risk Zones with fire-proof mesh.

# 5. SITUATIONAL AWARENESS

### 5.1. Overview

Visibility and readily available access to current and forecasted meteorological conditions and fuel conditions is a key aspect of Idaho Power's wildfire mitigation strategy. Meteorological and fuel conditions can vary significantly across Idaho Power's service territory. Idaho Power leverages its internal atmospheric science department's modeling/forecasting capabilities, its existing field weather stations, and publicly available weather/fuel data to develop projections of current and future wildfire potential across Idaho Power's service territory. This wildfire potential information is then available to operations personnel to factor into their operational decision-making.

### 5.2. Fire Potential Index

Idaho Power has developed an FPI tool based upon original work completed by San Diego Gas and Electric, the National Forest Service, and the National Interagency Fire Center and modified for Idaho Power's Idaho and Oregon service territory. This tool is designed to support operational decision-making to reduce fire threats and risks. This tool converts environmental, statistical, and scientific data into an easily understood forecast of the short-term fire threat which could exist for different geographical areas in the Idaho Power service territory. The FPI is issued for a seven-day period to provide for planning of upcoming events by Idaho Power personnel.

The FPI reflects key variables, such as the state of native vegetation across the service territory ("green-up"), fuels (ratio of dead fuel moisture component to live fuel moisture component), and weather (sustained wind speed and dew point depression). Each of these variables is assigned a numeric value and those individual numeric values are summed to generate a Fire Potential value from zero to sixteen, each of which expresses the degree of fire threat expected for each of the 7 days included in the forecast. The FPI scores are grouped into the following index levels:

- Green: FPI score of 1 through 11 indicates low potential for a large fire to develop and spread as there is normal vegetation and fuel moisture content as well as weak winds and high relative humidity.
- **Yellow**: FPI score of 12 through 14 indicates an elevated potential for a large fire to develop and spread as there are lower than normal vegetation and fuel moisture content as well as moderate winds and lower than normal relative humidity.
- **Red**: FPI score of 15 through 16 indicates a higher potential for a large fire to develop and spread as there are well below normal vegetation and fuel moisture content as well as strong winds and low relative humidity.

Fire Potential Index (FPI) Category								
Normal Elevated High								
FPI Range	1 to 11	12 to 14	15 - 16					

The state of native grasses and shrubs, or **Green-Up Component**, of the FPI is determined using satellite data for locations throughout the Idaho Power areas of interest. This component is rated on a 0-to-5 scale ranging from very wet (or "lush") to very dry (or "cured"). The scale is tied to the Normalized Difference Vegetations Index (NDVI), which ranges from 0 to 1, as follows:

Green-Up Component									
NDVI	Very Wet/Lush: 1.00 to 0.65	0.64 to 0.60	0.59 to 0.55	0.54 to 0.50	0.49 to 0.40	Very Dry/Cured 0.39 to 0.00			
Score	0	1	2	3	4	5			

The **Fuels Component (FC)** of the FPI measures the overall state of potential fuels which could support a wildfire. Values are assigned based on the overall state of available fuels (dead or live) for a fire using the following equation:

#### FC = FD / LFM

Where FC represents Fuels Component in the scale below, FD represents 10-hour Dead Fuel Moisture (using a 1-to-3 scale), and LFM represents Live Fuel Moisture (percentage). This data will be collected from satellite sources and regional databases supported by state and federal agencies.

The product of this equation represents the fuels component that is reflected in the FPI as follows:

Very Wet					Very Dry
0	1	2	3	4	5

The **weather component** of the FPI represents a combination of sustained wind speeds and dew-point depression as determined using the following scale. Regional adjustment to criteria limits for the upper wind speeds may occur after further discussion with subject matter experts from each of the regional operations. This data will be sourced from the weather, research and forecasting (WRF) products produced by Idaho Power using its High-Performance Computing (HPC) system. In addition to the HPC system produced WRF data, several national level

meteorological products will be used. These products will include regional weather observations used to validate model information.

Dewpoint Depression/Wind	≤5 mph	6 to 11 mph	12 to 18 mph	19 to 25 mph	26 to 32 mph	≥33 mph
≥50ºF	4	4	4	5	5	6
40ºF to 49ºF	3	3	4	4	5	5
30ºF to 39ºF	3	3	3	4	4	5
20ºF to 29ºF	3	3	3	3	3	4
10ºF to 19ºF	2	2	2	2	2	3
<10ºF	0	1	1	1	1	2

# 5.3. FPI Annual Process Review

The FPI process will be reviewed annually after completion of the fire season and, with consultation of interested parties (e.g., Load Serving Operator, Line Crews, and others), will be updated to enhance Idaho Power's wildfire preparedness.

# 6. MITIGATION—FIELD PERSONNEL PRACTICES

### 6.1. Overview

A component of Idaho Power's wildfire mitigation strategy is to prevent the accidental ignition and spread of wildfires due to employee work activities. Idaho Power developed the *Wildland Fire Preparedness and Prevention Plan* (Appendix A) to provide guidance to Idaho Power employees and contractors to help prevent the accidental ignition and spread of wildfires due to company work activities in locations and under conditions where wildfire risk is heightened. All Idaho Power crews and certain field personnel performing work on or near Idaho Power's facilities are expected to operate in accordance with the Plan and continue to conduct themselves in a fire-safe manner.

# 6.2. Wildland Fire Preparedness and Prevention Plan

The Wildland Fire Preparedness and Prevention Plan informs Idaho Power personnel and its line construction contractors about the following factors:

- Annual fire season tools and equipment to be available when on the job site
- Daily situational awareness regarding locations of heightened potential for fire risk and weather conditions in those areas
- Expected wildfire ignition prevention actions while working and reporting instructions in the event of fire ignition
- Training and compliance requirements

# 7. MITIGATION—OPERATIONS

### 7.1. Overview

A component of Idaho Power's wildfire mitigation strategy is to continue safe and reliable operation of its T&D lines while also reducing wildfire risk. These operational practices primarily center around the following:

- Temporary operating procedures for transmission lines during the fire season <sup>13</sup>
- An operational strategy for T&D lines during time periods of elevated wildfire risk during the fire season
- A PSPS strategy for Idaho Power's service area and transmission corridors

# 7.2. Transmission Line Operational Strategy

# 7.2.1. Fire Season Temporary Operating Procedure for Transmission Lines

Each year, typically in May, leadership within Idaho Power's Load Serving Operations (LSO) department updates and issues its Fire Season Temporary Operating Procedure. The purpose of this temporary operating procedure is to provide LSO employees with guidelines for operating transmission lines during the summer fire season. The procedure aims to reduce wildfire risk through practices relating to information collection, notification, and procedures for testing/closing in on locked-out transmission lines.

# 7.2.2. Red Risk Zone Transmission Operational Strategy

During wildfire season, Idaho Power determines a daily FPI as described in Section 5 of this WMP. The FPI informs the transmission line operational strategy for those lines owned, operated, and located in RRZs. These lines will be operated in normal settings mode but with no "testing" of a line that may have "locked out" during the time of a red FPI. Essentially, in the event of a fault on the specified transmission line(s) during a red FPI, the line will operate as normal and may "lock out," at which time the line(s) will either need to be patrolled before "testing" or wait until the FPI level drops out of the red category prior to being reenergized.

<sup>&</sup>lt;sup>13</sup> The duration of the fire season will be reviewed and defined annually.

<sup>&</sup>lt;sup>14</sup> Transmission line "testing" refers to the human act of re-energizing a line without completing a physical field patrol or observation of a line.

# 7.3. Distribution Line Operational Strategy

# 7.3.1. Red Risk Zone Distribution Operational Strategy

During wildfire season, Idaho Power determines a daily FPI as described in Section 5 of this WMP. The FPI informs the distribution line operational strategy for those lines located in the wildfire RRZs. These lines will be operated in a non-reclosing <sup>15</sup> state during the time of red FPI. Essentially, in the event of a fault on the specified distribution line(s) during the red FPI, the line(s) will be automatically de-energized with no reclosing attempts until either the line(s) has been patrolled or the FPI level drops out of the red category.

# 7.4. Public Safety Power Shutoff

### 7.4.1. PSPS Definition

PSPS, as used in this WMP, is defined as the proactive de-energization of electric transmission and/or distribution facilities during extreme weather events to reduce the potential of those electrical facilities becoming a wildfire ignition source or contributing to the spread of wildfires. The concept is as follows: if significant weather events can be predicted far enough in advance, the resulting proactive line de-energization before the forecasted weather conditions materialize could mitigate the risk of a wildfire. A PSPS event has significant customer impact and requires significant planning.

PSPS is <u>not</u> the practice of de-energizing lines in the following types of situations:

- Unplanned de-energization of lines required for emergencies and during outage restoration situations.
- Planned line or station work activities that require a planned outage (Idaho Power currently has a planned outage customer notification process in place for this).
- Reactive de-energization of electric transmission and/or distribution facilities, which may
  be either at Idaho Power's determination or at the request of fire managers (e.g., BLM,
  U.S. Forest Service, or other fire-fighting managers) in response to existing/encroaching
  wildfire threatening to burn into such facilities.
- Automated de-energization of electric transmission and/or distribution facilities due to smoke/fire from an existing fire causing a fault on the line.

<sup>&</sup>lt;sup>15</sup> Distribution line "non-reclosing" refers to the deactivation of automatic re-energization of a distribution line or use of a non-reclosing device such as a fuse.

Idaho Power will continue its current de-energization practices in the above referenced, and comparable situations. Such outage situations are not defined as PSPS events in the context used here and, as a result, would not trigger PSPS protocols.

### 7.4.2. PSPS Plan

Idaho Power developed a PSPS Plan (see Appendix B) that operates in parallel with its wildfire mitigation strategy. Although the wind patterns in Idaho Power's service area are generally of a much lower sustained velocity and often less predictable (i.e., micro-bursts) than other utilities' service areas where PSPS has most frequently been utilized (i.e., California), the company's PSPS Plan generally follows industry best practices by considering other utilities' PSPS plans and incorporating input from Idaho Power's external consultant, discussed in 3.2 above, which developed the company's WMP risk maps.

# 8. MITIGATION—T&D PROGRAMS

### 8.1. Overview

Idaho Power's wildfire mitigation strategy relies in part on its various asset management programs and vegetation management program to maintain safe and reliable operation of its T&D facilities in reducing wildfire risk.

# 8.2. T&D Asset Management Programs

In addition to maintaining a number of existing and newly implemented robust asset management programs intended to reduce wildfire risk, Idaho Power continues to research, monitor, and pilot emerging technologies and strategies to manage its T&D infrastructure.

Idaho Power's key asset management programs supporting wildfire prevention and mitigation are summarized in the table below.

Table 5
Summarized T&D asset management programs (associated with the WMP)

#### Transmission

Aerial Visual Inspection Program

**Ground Visual Inspection Program** 

Detailed Visual (High Resolution Photography) Inspection Program

Wood Pole Inspection and Treatment Program

Cathodic Protection and Inspection Program

Wood Pole Wildfire Protection Program (enhanced)

Steel Pole (Structures) (enhanced)

#### Distribution

Ground Detail Inspection Program (enhanced)

Wood Pole Inspection and Treatment

Wood Pole Fire Protection Program (enhanced)

Line Equipment Inspection Program

Overhead Primary Harden Program

Replace "small conductor" with new 4acsr or larger conductor (new)

Replace or repair damaged conductor

Re-tension loose conductors including "flying taps" and slack spans as required

Replace wood-stubbed poles with new wood poles (enhanced)

Replace white and yellow square tagged poles with new wood poles

Replace wood pins/wood crossarm with new steel pins/fiberglass crossarms

Replace steel insulator brackets with new steel pins/fiberglass crossarms (new)

Replace wedge deadends on primary taps with new polymer deadend strain insulators

Replace aluminum deadend strain insulators with new polymer deadend strain insulators (new)

Replace porcelain switches with new polymer switches

Replace hot line clamps

Replace aluminum stirrups

Install avian cover

Relocate arresters

Install bird/animal guarding

Update capacitor banks

Replace swelling capacitors

Replace oil-filled switches with vacuum style

Replace porcelain switches with polymer switches

Install disconnect switches on CSP transformers

Install avian cover

Update down guys

Replace/Install down-guy insulators with fiberglass insulators

Tighten down guys

Tighten hardware

Correct 3rd party pole attachment clearances (report to Joint Use Department)

# 8.2.1. Transmission Asset Management Programs

Several of Idaho Power's transmission management programs have been in place for decades and include condition-based aerial visual inspections, ground visual inspections, detailed visual (generally using high-resolution photography) inspections, transmission wood pole inspection and treatment, and cathodic protection. Additionally, Idaho Power has used various methods and materials to prevent wildfire from damaging wood structures and now intends to use a fire-resistant mesh wraps installed on structures located in the RRZ and YRZs.

### 8.2.1.1. Aerial Visual Inspection Program

Annually, Idaho Power uses helicopters to assist Idaho Power qualified personnel in the visual aerial inspection of transmission lines identified as WECC Path Lines. This method of line inspection is now used for transmission lines located in the RRZs. In addition, unmanned aerial vehicles with high-definition cameras are now used in certain situations to inspect facilities on these lines. These inspections allow personnel to look for potential line defects, which, if found, are noted and scheduled for repair.

All noted defects are prioritized as Priority 1, Priority 2, or Priority 3, based on the criteria listed below:

- **Priority 1**: Defects that, depending on the circumstances, require reporting and repair as soon as reasonably possible.
- **Priority 2**: Defects that, depending on the circumstances, generally require reporting and correction within 24 months of identification. The correction of these defects should be scheduled during crews' normal work schedules. Priority 2 defects not assigned a corrective plan within 24 months will be reviewed by the T&D vegetation and maintenance engineering leader.
- **Priority 3**: Potential issues that may need correction but do not pose a threat to the system and should be monitored. A Priority 3 designation may also be used by Idaho Power personnel for tracking of certain line construction practices.

Corrective action plans for Priority 1 and 2 defects are determined by engineering personnel for each prioritized defect and are scheduled and repaired.

### 8.2.1.2. Ground Visual Inspection Program

Annually, Idaho Power qualified personnel (i.e., trained in transmission line inspection procedures and experienced in transmission line construction) complete ground visual inspections of all transmission lines. Ground patrols are completed using four-wheel-drive vehicles, all-terrain vehicles, utility terrain vehicles, and/or on foot. These inspections identify potential line defects that are noted and scheduled for repair following the same process as described in 8.2.1.1.

### 8.2.1.3. Detailed Visual (High-resolution Photography) Inspection Program

In addition to the annual inspections and associated maintenance, Idaho Power also completes detailed visual inspections generally utilizing high resolution photography. This detailed inspection is typically completed using helicopters, unmanned aerial vehicles, and contracted professionals operating high definition cameras and, if potential line defects are noted, they are scheduled for repair following the same process as described in 8.2.1.1. The detailed inspections are completed on a 10-year cycle in conjunction with the 10-year cycle of wood pole ground line inspection and treatment (see 8.2.1.4).

### 8.2.1.4. Wood Pole Inspection and Treatment Program

All wood poles are visually inspected, sounded, and bored for defects and decay on a 10-year cycle. The poles are categorized according to the following:

- **Reported**: Any wood pole inspected and found to be installed within 10 years of the manufactured date or last inspection date.
- **Treated**: Any wood pole inspected and found to be installed 11 years or more prior to the inspection date and is determined to be in sound enough condition to warrant treatment.
- **Rejected**: Any wood pole determined to fit the following criteria:

- Have less than 4 inches of shell at 48 inches above the ground line; and/or
- Less than 2 inches of shell at 15 inches above the ground line; and/or
- Less than 2 inches of shell at the ground line; or
- Is deteriorated and does not meet minimum strength criteria; or
- Fails a visual inspection.

Rejected poles are categorized as: reinforceable with steel, non-reinforceable and are to be replaced.

- **Visually Rejected**: Any wood pole that has been damaged (i.e., burned, split, broken, hit by a vehicle, damaged by animals, etc.) above the ground line to such an extent as to warrant rejection and that cannot be further tested to determine priority status.
- **Sounded, Bored, and Treated**: Any wood pole set in concrete, asphalt, or solid rock 11 years or more prior to the inspection date is internally treated. Internal treatment involves fumigating the good wood and flooding the voids with fumigant.

### 8.2.1.5. Cathodic Protection and Inspection Program

Cathodic protection systems are employed on select steel transmission towers. These systems use either an impressed current corrosion protection system (ICCP) or direct-buried sacrificial magnesium anodes. Included in Idaho Power's tower maintenance plan, every 10 years, structure-to-soil potential testing is performed on select towers with direct-buried anodes. For ICCP systems, rectifiers and ground-beds are tested to ensure they are functioning properly. Based on test results repairs and adjustments are completed. Each year all rectifiers are inspected, and direct current (DC) voltage and DC current readings noted.

### 8.2.1.6. Thermal Imaging (Infra-red) Inspections

Idaho Power will complete annual inspections of lines and equipment using thermal imaging (infra-red) cameras. This inspection methodology, although not new to Idaho Power, is being expanded to specifically include the RRZs. Compromised electrical connections and overloaded equipment may be identified using thermal imagery. Identified risks will be prioritized and mitigated using the prioritization methodology noted in 7.2.1.1 of this WMP.

### 8.2.1.7. Wood Pole Wildfire Protection Program

Idaho Power has utilized numerous technologies to minimize the damage to wood poles that have been exposed to wildfires. The current technology of "mesh wraps" is utilized on transmission wood poles located in the RRZs and YRZs.

#### 8.2.1.8. Transmission Steel Poles

Idaho Power will utilize steel poles or structures for new transmission line construction projects built to 138 kV standards and above in an attempt to minimize wildfire damage and improve transmission line resilience. Wood poles may be used on 138 kV structures for emergency and maintenance replacements based on the specific engineering, right-of-way, permitting, and scheduling requirements for each project. Wood construction is used for voltages below 138 kV unless a different material is needed to meet specific engineering or planning requirements.

# 8.2.2. Distribution Asset Management Programs

Idaho Power has several distribution asset management programs that are mature, have been implemented for decades, and will continue to be utilized in the RRZs. These programs include condition-based, detailed, and ground visual inspection; distribution wood pole inspection and treatment; and line equipment inspection.

Idaho Power also has an enhanced overhead distribution "hardening" program to implement in the RRZs. Examples of specific work include replacement of small conductors and associated hardware and replacement of wooden pins and associated wooden crossarms.

### 8.2.2.1. Ground Detailed Visual Inspection Program

Annually, qualified line patrol personnel (trained in distribution line inspection procedures and experienced in distribution line construction) complete detailed ground inspections of the distribution lines located in the RRZs. The ground patrols are completed using four-wheel-drive vehicles, all-terrain vehicles, utility terrain vehicles, or on foot. These inspections identify potential line defects that are noted and scheduled for repair.

All noted defects are prioritized as Priority 1, Priority 2, or Priority 3, based on the criteria listed below:

- **Priority 1**: Defects that, depending on the circumstances, require reporting and repair as soon as reasonably possible.
- **Priority 2**: Defects that, depending on the circumstances, generally require reporting and correction within 24 months of identification. The correction of these defects should be scheduled during crews' normal work schedules. Priority 2 defects not assigned a corrective plan within 24 months will be reviewed by the T&D Vegetation and maintenance engineering leader.
- **Priority 3**: Potential issues that may need correction but do not pose a threat to the system and should be monitored; or tracking of certain line construction practices.

Corrective action plans for Priority 1 and 2 defects are determined by engineering personnel for each prioritized defect and are scheduled and repaired.

### 8.2.2.2. Wood Pole Inspection and Treatment Program

All wood poles are visually inspected, sounded, and bored for defects and decay. The procedure is noted in 8.2.1.4.

### 8.2.2.3. Line Equipment Inspection Program

Line equipment, particularly distribution system protection line equipment, is inspected annually by line operations technicians. The inspection includes a visual inspection and, when electronic reclosers are present, data is retrieved from controls and analyzed for proper operation.

### 8.2.2.4. Overhead Primary Hardening Program

Overhead distribution infrastructure located in the RRZs will be analyzed and may be inspected and hardened depending upon proximity to fuels conducive to wildfires in the unlikely event of failure of the line infrastructure. It is expected to take multiple years to inspect and harden all applicable overhead distribution lines.

The Overhead Primary Hardening program is intended to upgrade or repair certain overhead distribution infrastructure. Criteria as outlined in Table 5 drives the program work. Notable criteria are further explained in the following sections of this WMP.

### 8.2.2.4.1. Conductor "Small" Replacement

Idaho Power is implementing replacement of small conductors in the RRZs. Small conductors are those in sizes less than that of 4ACSR conductor. Examples of small wires include 6Cu, 6-3SS, 8A, 8A CW, 9IR, etc. These small conductors will be replaced with standard larger conductors, primarily with 4ACSR conductor.

### 8.2.2.4.2. Wood Pin and Crossarm Replacement

Wooden crossarms installed with wooden pins will continue to be replaced with fiberglass crossarms and steel pins. This work will be coordinated and included in the overhead primary hardening program. And, whenever work is being completed on a structure that requires replacement of wooden crossarms, Idaho Power will, generally, install fiberglass crossarms.

### 8.2.2.4.3. Porcelain Switch Replacement

Porcelain switches located in the RRZs will continue to be replaced with polymer switches. Additionally, associated hot clamps and stirrups will be replaced. This work will be coordinated and included in the overhead primary hardening program.

#### 8.2.2.4.4. Fuse Options

Idaho Power investigated reasonable alternatives to replace certain expulsion fuses and expulsion arrestors. A pilot program was initiated in 2020 to replace several expulsion fuses with non-expulsion fuses in the vicinity of the Boise foothills. This pilot program was successful and Idaho Power implemented a subsequent program to replace expulsion fuses with non-expulsion fuses in RRZs as a part of its distribution overhead primary wildfire hardening program.

### 8.2.2.4.5. Thermal Imaging (Infra-red) Inspections

Idaho Power will complete annual inspections of lines and equipment using thermal imaging (infra-red) cameras. This inspection methodology, although not new to Idaho Power, is being expanded to specifically include the RRZs. Compromised electrical connections and overloaded equipment may be identified using thermal imagery. Identified risks will be prioritized and mitigated using the prioritization methodology noted in 8.2.2.1 of this WMP.

### 8.2.2.4.6. Wood Pole Wildfire Protection Program

Idaho Power has utilized numerous technologies to minimize the damage to wood poles that have been exposed to wildfires. The current technology of "mesh wraps" is utilized on certain distribution wood poles located in the RRZs.

# 8.3. T&D Vegetation Management

Idaho Power's T&D vegetation management program (VMP) addresses public safety and electric reliability and helps to safeguard T&D lines from trees and other vegetation that may cause an outage or damage to facilities. Specifically, the lines are inspected periodically, and trees and vegetation are cleared away from the line while certain trees are removed entirely. In addition, the VMP addresses the clearing of vegetation near the base of certain poles and line structures. The responsibilities of the VMP include the planning, scheduling, and quality control of VMP associated work. The VMP is active year-round and complies with applicable NESC, federal, and state requirements. Additional vegetation monitoring tools are in various stages of development, and Idaho Power will evaluate such tools for potential future implementation.

Idaho Power's key components of its VMP, relative to the WMP, are summarized in the table below.

### Table 6 VMP summary

#### Vegetation Management

Pre-Fire Season Inspection and Mitigation

Line Clearing Cycle Goal: 3-year cycle for valley areas & 6-year cycle for mountain areas

Tree Removals - Hazard Trees

**Targeted Pole Clearing** 

100% Quality Assurance/Quality Control Auditing in RRZs and YRZs

Pre-Fire Season Inspection and Mitigation

Line Clearing Cycle Goal: 3-year cycle in all areas with mid-cycle pruning occurring in 2<sup>nd</sup> year in RRZs and YRZs\*

Tree Removals - Cycle Busters/Hazard Trees

**Targeted Pole Clearing** 

100% Quality Assurance/Quality Control Auditing in RRZs and YRZs

### 8.3.1. Definitions

**Applicable Transmission Lines**—Each overhead transmission line operated within the WMP RRZ at 46 kilovolts (kV) or higher.

**Cycle Buster**—Trees that grow at a rapid rate, requiring a more frequent trimming schedule than the normal trim cycle.

**Hazard Tree**—Any vegetation issue that poses a threat of causing a line outage but has either a low or medium risk of failure in the next month. Hazard trees will be further defined as posing either a medium hazard or low hazard.

**High-Priority Tree**—Any vegetation condition likely to cause a line outage with a high risk of failure in the next few days or weeks. High-priority trees could also be vegetation that is in good condition but has grown so close to the lines that it could be brought into contact with the line through a combination of conductor sag and/or wind-induced movement in the conductor or the vegetation.

Line Clearing Cycles—T&D clearing of lines defined on a periodic basis.

<sup>\*</sup>Distribution line clearing cycles vary by utility. Idaho Power has set a goal of achieving a 3-year cycle of distribution line clearing.

# 8.3.2. Transmission Vegetation Management

Maintaining a zone near transmission lines that is free of vegetation has long been a priority for Idaho Power. The clearance zone is voltage-level dependent and defined by federal and state regulations.

### 8.3.2.1. Transmission Vegetation Inspections

Utility arborists annually conduct aerial and/or ground patrols on each applicable transmission line to identify and mitigate vegetation hazards. In addition, transmission patrol personnel inspect all applicable transmission lines once a year to identify any transmission defects and vegetation hazards. During these inspections, the patrol personnel will identify hazardous vegetation, within or adjacent to the Right of Way (ROW), that could fall in or onto the transmission lines or associated facilities. The patrol personnel will evaluate the hazardous vegetation as to the level of threat posed by categorizing the vegetation as a *high priority*, *medium hazard*, or *low hazard*. Any hazardous vegetation found is reported to the utility arborist and documented. Any hazardous vegetation categorized as a *high priority* and that presents a risk to cause an outage at any moment shall also be reported without any intentional time delay to the grid operator. The utility arborist will conduct a follow-up inspection if potential hazard trees or grow-ins are identified. The utility arborist prioritizes and schedules any remedial action for all reported vegetation issues.

### 8.3.2.2. Transmission Line Clearing Cycles

Transmission lines will be cleared on long-term cycles based on 3 years for urban and rural valley areas and 6 years for mountain areas. However, shorter clearing cycles may occur if conditions dictate out-of-cycle trimming. In most cases, vegetation is cleared primarily through manual cutting of targeted trees and tall shrubs. However, when appropriate and in compliance and permission with federal and state requirements, tree-growth regulators and spot herbicide treatments are applied as effective techniques for reducing re-growth of sprouting deciduous shrubs and trees and extending maintenance cycles.

### 8.3.2.3. Transmission Line Clearing Quality Control and Assurance

When line clearing work is required, either a utility arborist or a contracted notifier completes field inspections to make sure the clearing work meets requirements. A line clearing audit form is completed and retained.

# 8.3.3. Distribution Vegetation Management

Idaho Power is actively working to clear distribution lines throughout Idaho Power's service territory on a three-year cycle. <sup>16</sup> Additionally, in the RRZs and YRZs, Idaho Power completes annual vegetation line inspections and mid-cycle clearing of the lines in the second year,

<sup>&</sup>lt;sup>16</sup> Idaho Power will test a three-year cycle for a period of 4 or 5 years to verify that such a cycle can be maintained and that the expected benefits are realized.

is increasing the number of trees removed, and is completing 100% quality control reviews of contractor line clearing work by certified arborists.

### 8.3.3.1. Distribution Line Clearing Cycles

Idaho Power is actively working to clear distribution lines on a three-year cycle. In RRZs and YRZs, Idaho Power's goal is to perform mid-cycle pruning in the second year to remove faster growing vegetation to ensure the lines are clear of vegetation for the full pruning cycle. In addition, Idaho Power clears lines based upon "special request" in the situations that fast growing, unexpected growth occurs and is reported by any employee or customer.

### 8.3.3.2. Distribution Vegetation Inspections

In addition to regular cycle pruning activities, utility arborists are annually conducting ground patrols to identify potential vegetation hazards of each distribution line identified in the RRZs and YRZs. In addition, distribution patrol personnel also inspect the lines in the RRZs annually. During these inspections, patrol personnel identify infrastructure defects and hazardous vegetation, within or adjacent to the ROWs, that could fall in or onto the distribution lines or associated facilities. The patrol personnel then evaluate the hazardous vegetation as to the level of threat posed by categorizing the vegetation as a *high priority*, *medium hazard*, or *low hazard*. Any hazardous vegetation found is reported to the utility arborist and documented. Any hazardous vegetation categorized as a *high priority* and that presents a risk to cause an outage at any moment shall also be reported without any intentional time delay to the Grid Operator. The utility arborist will conduct a follow-up inspection if potential hazard trees or grow-ins are identified. The utility arborist prioritizes and schedules any remedial action for all reported vegetation issues.

### 8.3.3.3. Distribution Line Clearing Procedures

In most cases, vegetation is cleared as scheduled work and includes, but is not limited to, the removal of dead branches overhanging power lines, weak branch attachments, damaged root base or dead or dying trees leaning toward Idaho Power facilities. Vegetation clearing methods include crews using chain saws or specialized pruning machines. Trees are cleared using a pruning procedure called directional or natural pruning, a method recommended by the International Society of Arboriculture, and the ANSI A300 standards.

However, when appropriate and in compliance and permission with federal and state requirements, tree-growth regulators and spot herbicide treatments are applied as effective techniques for reducing re-growth of sprouting deciduous shrubs and trees and extending maintenance cycles.

Through its vegetation management program, Idaho Power has a target to maintain clearance distance between vegetation and conductors as follows:

- Five feet for conductors energized at 600 through 50,000 volts.
- Clearances may be reduced to three feet if the vegetation is not considered to be readily climbable because the lowest branch is greater than eight feet above ground level.

- New tree growth that is no larger than ½ inch in diameter may intrude into this minimum clearance area provided it does not come closer than six inches to the conductor. This new growth is identified during line patrols and removed.
- For conductors energized below 600 volts, vegetation is pruned to prevent the vegetation from causing unreasonable strain on electric conductors.

### 8.3.3.4. Distribution Line Clearing Quality Control and Assurance

When line clearing work is required, either a utility arborist or a contracted notifier completes field inspections to make sure the clearing work meets requirements. A line clearing audit form is completed and retained.

# 8.3.4. Pole Clearing of Vegetation

Idaho Power has historically cleared vegetation from the base of certain transmission wood poles and a limited number of distribution wood poles in Idaho. These vegetation clearing practices have been deemed an effective method of minimizing wildfire damage to existing wood poles. Where acceptable and permissible, Idaho Power removes or clears vegetation in a 20-foot radius surrounding the wood poles and applies a 10-year weed-control ground sterilant (SpraKil SK-26 Granular). Idaho Power submitted an SF-299 application with the Oregon BLM Vale District Office to prepare an Environmental Assessment to use the same ground sterilant on transmission and distribution facilities in Oregon. The schedule provided to Idaho Power by the BLM for this work shows it to be completed by June 2022 and implemented in July 2022 pending no appeals.

### 9. WILDFIRE RESPONSE

### 9.1. Overview

Idaho Power responds to wildfires involving or impacting its facilities and/or resulting in a system outage; depending on the specific circumstances, Idaho Power may also respond to wildfires with the potential to result in an outage. Idaho Power's actions include without limitation:

- Taking appropriate steps, where safe to do so, to protect Idaho Power-owned facilities from fire damage;
- Restoring electrical service following an outages; and,
- Communicating with and informing customers.

These actions are taken on a 24-hour basis.

# 9.2. Response to Active Wildfires

Idaho Power field crews are trained to respond to active wildfires to monitor the situation regarding Idaho Power's facilities. Although they carry certain fire suppression equipment for use on very small fires in limited situations, Idaho Power's crews are not professionally trained firefighters and are instructed not to place themselves in a hazardous position when responding to wildfires. When responding to an active wildfire, Idaho Power personnel immediately report to, and take appropriate direction from, the Incident Commander (IC) or other fire response entity official with jurisdiction over the incident.

# 9.3. Emergency Line Patrols

At certain times, unplanned de-energization of lines requires qualified line personnel to conduct "emergency" patrols (inspections) of the de-energized lines. These patrols identify outage causes, damaged facilities, ingress/egress routes, and restoration requirements (number of crews, crew sizes, and necessary materials).

# 9.4. Restoration of Electrical Service

Idaho Power personnel restore electrical service when it is safe to do so following a wildfire. Trained field crews report to the site where damage has occurred with equipment and new materials and develop a plan to remove and rebuild damaged facilities. Depending on the situation, contracted field crews—such as line crews and vegetation management crews—are also deployed to assist in restoration efforts. Restoration work may take hours or, in some rare cases, days to complete. Depending on the extent of damage, customers may need to

perform repairs on their facilities and pass inspections by local agencies prior to having full electric service restored.

Due to the unique construction, need for specialized equipment, and—in many cases—remote location of many of Idaho Power's transmission lines, Idaho Power developed a *Transmission Emergency Response Plan*. This plan includes restoration processes related to all transmission voltage classes from 46 through 500 kV. The plan outlines the basic approach and certain details about notification, materials, damage assessment, coordination, and preparedness.

### 9.4.1. Mutual Assistance

Idaho Power is a member of the Western Region Mutual Assistance Agreement (WRMAA), of which the majority of western United States electric utilities are also members. Member utilities provide emergency repair and restoration assistance to other member utilities requesting assistance when dealing with damaged electric facilities following a significant wildfire or weather event. In the event of a catastrophic wildfire that causes widespread damage to Idaho Power's system, Idaho Power may request restoration assistance via the WRMAA as a last resort option after utilizing available internal personnel and contracted entities.

### 9.5. Public Outreach and Communications

Idaho Power maintains an *Emergency Response Communication Plan*. The intent of this communication plan is to provide consistent and reliable internal and external communication in large outage or emergency situations, including wildfires, that have wide-ranging impacts on Idaho Power's service areas. Internal and external communications precipitated by a wildfire will be performed in accordance with this emergency response plan, which is reviewed and updated annually.

# 10. COMMUNICATING THE PLAN

# 10.1. Objective

Idaho Power communicates about this WMP internally to employees and externally to the public. The company provides related fact sheets and maps depicting areas of elevated wildfire risk as well as online resources (some of which are continuing to be developed) aimed at:

- Demonstrating Idaho Power's focus on system integrity and reliability and potential impacts on the public
- Demonstrating Idaho Power is proactively, reasonably, and responsibly addressing wildfire risk, including meeting requirements of its state regulators
- Furthering Idaho Power's collaboration and information sharing with federal, state, and local government and agencies
- Keeping Idaho Power customers informed
- Informing and guiding Idaho Power employee and contractor

### 10.2. Idaho Power External Communications

# 10.2.1. Community Engagement

Idaho Power presents and distributes information regarding its WMP to a wide variety of stakeholders including without limitation the BLM, U.S. Forest Service, and county and city officials.

Idaho Power engages with various Public Safety Partners, including local governments, emergency response management and Idaho's and Oregon's ESF-12 and social service and welfare agencies (e.g., Oregon's Department of Human Services). These engagements focus on wildfire awareness, prevention and outage preparedness outreach and opportunities for collaboration. For example, the company worked collaboratively with the Boise City Fire Department in developing certain portions of the Boise City Fire Code–043019. Idaho Power may also include tabletop exercises with Public Safety Partners prior to wildfire season, designed to mimic fire emergency events, including PSPS events, to assist with wildfire preparedness.

### 10.2.2. Idaho Power Customers

Safety is Idaho Power's most important value. Attention to the detail of safe operations permeates our workplace culture and interactions with customers. This standard is applied to protecting Idaho Power's equipment from wildfire, reducing the likelihood of wildfire and informing the public about the likelihood of wildfire and ways customers should respond.

Idaho Power distributes information regarding its WMP to its customers via the following tools:

- Fact sheets
- Mass media articles/videos
- Community and/or individual presentations/discussions
- Social media
- Idaho Power online website
- Customer email/mailings
- Public education campaigns

#### 10.2.2.1 Prior to Wildfire Season

Idaho Power communicates to customers and the public what steps the company is taking, such as vegetation management and equipment maintenance, to reduce the likelihood of wildfires. Various communication mediums include:

- Connections (This monthly newsletter is an effective way to give customers nuanced information about the work Idaho Power does, but its planning and development takes months, so it is not an effective way to communicate urgent information.)
- eNews (video stories about a variety of topics, such as vegetation management)
- Emails
- Social media
  - Posts on Facebook, Instagram, Twitter and other platforms are an efficient way to reach large numbers of customers and the public. They are less intrusive than newsletters or phone calls.

Each fire season Idaho Power conducts wildfire awareness, prevention, and outage preparedness outreach to customers. Outreach content may include the following: wildfire prevention tips, Idaho Power fire mitigation efforts, PSPS considerations, emergency and outage preparedness tips and checklists, where to find outage information and Idaho Power's WMP or PSPS Plans, and recommendations to sign up for alerts and update contact information.

Annually, Idaho Power will hold at least one public meeting in Oregon and Idaho, offering a virtual meeting with additional access and functionality options. Feedback opportunities are also provided during and after the meetings.

Idaho Power also monitors long-term weather forecasts and fuel conditions and communicates to customers and the public the company's wildfire outlook using a combination of some or all of the following communication mediums:

- Idaho Power's website
- Connections (a monthly newsletter Idaho Power includes in customer electric bills to keep customers informed about topics such as affordable, reliable and clean energy, the company's efforts to protect the environment including wildfire mitigation, energy efficiency programs and customer options for doing business with Idaho Power.)
- Emails telling customers how to prepare for wildfires, the potential loss of power and potential evacuation.
- Social media
- News media (news releases, appearances on broadcast TV and radio shows, interviews, etc.)

### 10.2.2.2 During Wildfire Season

Idaho Power monitors weather forecasts and fuel conditions near Idaho Power equipment and communicates to customers and the public plans for reducing wildfire risk and protecting company equipment should a wildfire occur. Various communication mediums include:

- Idaho Power's website (The company's website provides wildfire safety information, such as videos, safety tips, and the latest version of the WMP.)
- Emails (If the likelihood of wildfire is elevated, these messages would take on greater urgency, though they would contain much of the same information as pre-wildfire season messages.)
- Social media (This is the quickest way to spread word of safety concerns, potential loss of power, evacuations, etc. Communication likely would contain up-to-date information from organizations like National Interagency Fire Center, USFS, and/or BLM.)
- News media
- Phone calls and text messages to customers

#### 10.2.2.3 After Wildfire Season

Idaho Power will communicate to customers and the public the scope of wildfires that approached Idaho Power equipment, how Idaho Power communicated safety messages to customers and the public, measures Idaho Power took to keep power lines safe, and the status of any ongoing recovery measures, such as replacement of poles, lines, and other equipment. Various communications mediums include:

- Connections
- eNews

- Social media
- News media
- Idaho Power website

# 10.3. Idaho Power Internal Communications—Employees

Idaho Power communicates with its employees in a variety of ways:

- News Scans for all employees
- Emails
- Leader communications
- GIS-based visual communication of risk zones and affected overhead lines
- Online training for employees influenced by the WMP
- In-person, hands-on, training for certain field employees

### 11. Performance Monitoring and Metrics

# 11.1. Wildfire Mitigation Plan Compliance

The Chief Operating Officer (COO) is the designated oversight officer for the Idaho Power WMP. The Vice President of Planning, Engineering and Construction (VP) is responsible for compliance monitoring, necessary training, and annual review of this WMP.

### 11.2. Internal Audit

Idaho Power's internal audit department, Audit Services, will periodically conduct an independent and objective evaluation of the WMP to assess compliance with policies and procedures and evaluate achievement of the Plan's objectives. Idaho Power's Compliance department will also periodically review Idaho Power's compliance with federal reliability standards regarding vegetation management practices.

### 11.3. Annual Review

Idaho Power will conduct an annual review of its WMP and incorporate necessary updates prior to wildfire season.

# 11.4. Wildfire Risk Map

The Wildfire Risk Map was established in 2020 by an external consultant. As noted in Section 2 of this report, the 2020 analysis was based, in part, on population census data from 2010. Considering the national census was conducted in 2020, Idaho Power is working with its external consultant to update the Wildfire Risk Map, which the company will continue to update periodically based on similar factors and other changing circumstances.

# 11.5. Situational Awareness

Idaho Power will share its FPI regularly and broadly with Idaho Power personnel and contractors during wildfire season to ensure condition-specific operating requirements are met.

# 11.6. Wildfire Mitigation—Field Personnel Practices

Idaho Power crews and certain personnel are required to follow the *Field Personnel Practices* when working on lines in the RRZs and YRZs during a red FPI. Specific requirements are found in Idaho Power's *Field Personnel Practices* which is consulted by such crews working in these areas.

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# 11.7. Wildfire Mitigation—Operations

Each year in preparation for the fire season, Idaho Power reviews and establishes:

- Temporary operating procedures for transmission lines during the fire season
- An operational strategy for distribution lines during time periods of elevated wildfire risk during the fire season
- Use of PSPS as a tool of last resort to prevent Idaho Power T&D facilities from becoming a wildfire ignition source or contributing to the spread of wildfires

# 11.8. Wildfire Mitigation—T&D Programs

This section lists metrics used to evaluate Idaho Power's asset management and vegetation management programs. Work is identified and prioritized each year and approved by executive management. Idaho Power's goal is to complete 100% of the work plan each year; however, emergencies or other unplanned events can occur and disrupt the annual work plan. All work is completed in accordance with safety and applicable requirements and industry standards.

Table 7
T&D programs metrics

Transmission	
Transmission Asset Management Programs	Description
Aerial Visual Inspection Program	Perform annual patrols and document identified defects according to priority. Complete repairs according to priority definition.
Ground Visual Inspection Program	Perform annual patrols and document identified defects according to priority. Complete repairs according to priority definition
Detailed Visual (High Resolution Photography) Inspection Program	Perform 10-year cycle patrols and document identified defects according to priority. Complete repairs according to priority definition
Wood Pole Inspection and Treatment Program	Perform 10-year cycle patrols and document identified defects according to priority. Complete repairs according to priority definition
Cathodic Protection and Inspection Program	Perform 10-year structure-to-soil potential testing on select towers with direct-buried anodes. Perform 10-year rectifier and ground-bed testing on ICCP systems. Annually inspect and record DC voltage and current readings of rectifiers. Complete repairs and adjustments.
Wood Pole Wildfire Protection Program	Inspect and install wraps on selected poles.
Distribution	
Distribution Asset Management Programs	Description
Wood Pole Inspection and Treatment Program	Perform 10-year cycle patrols and document identified defects according to priority. Complete repairs according to priority definition
Line Equipment Inspection Program	Complete annual inspections and data analysis and mitigate defects
Ground Detailed Inspection Program	Perform annual patrols and document identified defects according to priority. Complete repairs according to priority definition.
Distribution Infrastructure Hardening Program	Complete annual work plan

Replace "small conductor" with new 4acsr or larger conductor

Replace or repair damaged conductor

Re-tension loose conductors including "flying taps" and slack spans as required

Replace wood-stubbed poles with new wood poles

Replace white and yellow square tagged poles with new wood poles

Replace wood pins/wood crossarm with new steel pins/fiberglass

Replace steel insulator brackets with new steel pins/fiberglass crossams

Replace wedge deadends on primary taps with new polymer deadend strain insulators

Replace aluminum deadend strain insulators with new polymer deadend strain insulators

Replace porcelain switches with new polymer switches

Replace hot line clamps Replace aluminum stirrups Install avian cover Relocate arresters

Install bird/animal guarding

Update capacitor banks

Replace swelling capacitors

Replace oil-filled switches with vacuum style Replace porcelain switches with polymer switches

Replace certain expulsion arrestors

Install disconnect switches on CSP transformers Install avian cover

Update down guys

Replace/Install down-guy insulators with fiberglass insulators Tighten down guys

Tighten hardware

Correct 3rd party pole attachment violations (report to Joint Use Department)

Replace certain expulsion fuses

#### Vegetation Management

Transmission	Description
Pre-Fire Season Inspection and Mitigation	Perform annual pre-fire season inspections and mitigate noted "hot spots"
Line Clearing Cycles: Strive to maintain 3-year cycle for valley areas & 6-year cycle for mountain areas	Complete annual cycle pruning work plan
Tree Removals - Hazard Trees	Remove targeted hazard trees
Targeted Pole Clearing	Complete annually targeted structures
100% QA/QC Audits in RRZs and YRZs	Complete annually QA/QC audits
Distribution	Description
Pre-Fire Season Inspection and Mitigation	Perform annual pre-fire season inspections in RRZs and YRZs and mitigate noted "hot spots"
Line Clearing Cycle: Strive to maintain 3-year cycle	Complete annual cycle pruning work plan
Mid-Cycle Pruning in RRZs and YRZs	Complete annual mid-cycle pruning work plan in RRZs and YRZs
Tree Removals - Cycle Busters/Hazard Trees	Complete annual cycle pruning work plan
Targeted Pole Clearing	Complete annually targeted structures
100% QA/QC Audits in RRZs and YRZs	Complete annually QA/QC audits

# Appendix A

The Wildland Fire Preparedness and Prevention Plan.



Wildland Fire Preparedness and Prevention Plan

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#### 1. Plan Overview

#### A. Intent of Plan

The purpose of this Wildland Fire Preparedness and Prevention Plan (Plan) is to provide guidance to Idaho Power Company (IPC) employees to help prevent the accidental ignition and spread of wildland fires (wildfires) due to employee work activities in locations and under conditions where wildfire risk is heightened. It is expected that all IPC employees be aware of the provisions of this Plan, operate in accordance with the Plan and conduct themselves in a fire-safe manner.

### B. Scope of Plan

The scope of this Plan includes tools, equipment, and field behaviors IPC employees incorporate when working in locations and under conditions where wildfire ignition is heightened.

Operations of Transmission and Distribution (T&D) lines facilities, vegetation management, and T&D lines programs that mitigate wildfire risks are <u>not</u> included in this Plan; they are referenced in the separate Wildfire Mitigation Plan.

### 2. Situational Overview and Applicability

#### A. Wildfire Season

The provisions of this Plan shall be applicable during wildfire season. Within IPC's service area, wildfire season is defined as the closed fire season of May 10 through October 20 of each year, as established by Idaho State Law, Title 38-115.

Should any local, state, or federal government land management agency (i.e., the BLM, U.S. Forest Service, Oregon Department of Forestry, Idaho Department of Lands, etc.) issue any wildfire related order that extends wildfire season beyond that specified above, then compliance with that agency's order shall govern.

Many variables—such as drought conditions, weather, and fuel moisture—can cause the wildfire season to begin and/or end earlier or later. In summary, flexibility, judgment, attention to current and forecasted field conditions, and attention to governmental agency issued wildfire orders are necessary such that operational practices can be adjusted accordingly.

#### B. Wildfire Risk Zones

IPC's Wildfire Mitigation Plan includes a Wildfire Risk Map of IPC's service area. This Wildfire Risk Map may be accessed at the Idaho Power SharePoint site. All lands in the vicinity of IPC facilities are mapped as Red Zone, Yellow Zone or areas of minimal wildfire risk (i.e., not within a Red or Yellow Zone). Red and Yellow Zones are designated as Wildfire Risk Zones (WRZ). The provisions of this Plan shall apply to work activities taking place during wildfire season in these WRZs.

Should any local, state, or federal government land management agency (i.e., BLM, U.S. Forest Service, Oregon Department of Forestry, Idaho Department of Lands, etc.) issue any wildfire related order, then compliance with that agency's order shall govern if their order is more restrictive than that set forth in this Plan.

#### C. Fire Potential Index

Idaho Power's Atmospheric Science department has developed an FPI rating system that forecasts wildfire potential across IPC's service territory. The FPI considers many current and forecasted elements such as meteorological (winds-surface and aloft, temperatures, relative humidity, precipitation, etc.) and fuel state (both live and dead). The FPI is designed and calibrated for IPC's service area; specifically, those areas in proximity to IPC transmission, distribution, and generation facilities.

The FPI consists of a numerical score ranging from 1 (very green, wet fuels with low to no wind and high humidity) to 16 (very brown and dry, both live and dead dry fuels with low humidity and high temperatures). The FPI scores are grouped into the following 3 index levels:

Green: FPI score of 1 through 11

• Yellow: FPI score of 12 through 14

• Red: FPI score of 15 through 16

During wildfire season, Idaho Power will determine a daily FPI as described in Section 5 of the WMP. This weather forecast and FPI dashboard is contained within IPC geographic information system (GIS) viewers available to all IPC employees.

### D. Decision Making for Field Work Activities

Employees working in the field shall be cognizant of current and forecasted weather and field conditions. Awareness of these conditions, and exercising appropriate judgment, is essential when considering whether to undertake work activities when combinations of high temperatures, low humidity, dry fuels, and/or wind are present or forecasted to be present.

The following process steps shall apply to employees and crews contemplating field work during wildfire season:

#### Planned or Scheduled Work Activities:

#### 1. Fire Potential Indices:

a) Employees working in the field—NOT working on transmission or primary distribution lines should:

- i. Be aware of the current and forecasted weather and the FPI level for the area in which the work will be performed, through the FPI dashboard.
- ii. Once the FPI level for the work zone is identified, proceed with work but consider utilizing Prevention—Practices of Field Personnel (see Section 6 of this Plan).
- b) Employees working in the field—working on transmission or primary distribution lines should:
  - i. Be aware of the current and forecasted weather and the FPI level for the area in which the work will be performed.
  - ii. Once the FPI level for the work zone is identified, proceed as follows for each FPI level:
    - 1. **Green FPI** in All Zones: Proceed with the work.

      Consider utilizing Prevention—Practices of Field Personnel (see section 4 of this Plan)
    - 2. Yellow FPI in All Zones: Proceed with the work.
      Consider utilizing Prevention—Practices of Field Personnel (see section 4 of this plan)

#### 3. Red FPI

- a) **In Normal Zone:** Proceed with the work. Consider utilizing Prevention—Practices of Field Personnel (see Section 6 of this plan)
- b) In Medium Zone: Proceed with the work. However, it is a requirement to follow the Prevention—Practices of Field Personnel (see Section 6 of this plan)
- c) In High Zone: STOP. No planned work activities shall take place unless approved by operations level manager. Work consideration will be restoration of electric service or work deemed critical to providing safe, reliable electric service. If work is approved to proceed it is a requirement to follow the Prevention—Practices of Field Personnel (see Section 6 of this plan).

	High	15 to 16 (Red)	Proceed with work  Utilize Prevention/ Practices of Field Personnel  (Optional)	Proceed with work  Utilize Prevention/ Practices of Field Personnel  REQUIRED	STOP/NO WORK
Fire Potential Index (FPI)	Elevated	12 to 14 (Yellow)	Proceed with work  Utilize Prevention/ Practices of Field Personnel  (Optional)	Proceed with work  Utilize Prevention/ Practices of Field Personnel  (Optional)	Proceed with work  Utilize Prevention/ Practices of Field Personnel  (Optional)
	Normal	1 to 11 (Green)	Proceed with work  Utilize Prevention/ Practices of Field Personnel  (Optional)	Proceed with work  Utilize Prevention/ Practices of Field Personnel  (Optional)	Proceed with work  Utilize Prevention/ Practices of Field Personnel  (Optional)
			None	Yellow (Tier 2)	Red (Ter 3)

- 2. Land Management Agency Restrictions: Follow the requirements and restrictions of any wildfire restrictions related order that is issued by local, state, or federal land management agencies.
  - a) Immediately upon receiving knowledge of an order, The Environmental Services department will notify, via email, operations leadership within Power Supply, Customer Operations and Business Development, and T&D Engineering and Construction of wildfire related requirements and restrictions orders that are issued by local, state, or federal land management agencies.

### Emergency Response and Outage Restoration Work Activities:

Follow the same steps as identified above for planned work activities. However, it is recognized that the nature of emergency response and outage restoration situations will often require exceptions to the above. In these situations, leadership should be consulted, and appropriate judgment should be used given the nature of the emergency or outage at hand.

#### 3. Preparedness—Tools and Equipment

A. Required Personal Protective Equipment

Standard IPC Personal Protective Equipment (PPE) shall be worn in accordance with the IPC Safety Standard.

When entering a designated fire area being managed by the BLM or the U.S. Forest Service, additional PPE requirements may be in force by those agencies. These typically include:

- Hardhat with chinstrap
- Long sleeve flame-resistant (FR) shirt and FR pants
- Leather gloves
- Exterior leather work boots, 8" high, lace-type with Vibram type soles
- Fire shelter

### B. Required Tools and Equipment

Employees <u>NOT</u> working on transmission or distribution lines: Standard tools and equipment in accordance with the IPC Safety Standard and Fleet Services.

Employees working on transmission or distribution lines: IPC and the State of Idaho BLM entered into a March 2019 Master Agreement that governs various IPC and BLM interactions, including wildfire prevention related provisions. In addition to State of Idaho BLM lands, IPC has elected to apply these requirements to all work activities taking place on all WRZ in Idaho, Nevada, Montana, and Oregon. These requirements include:

- During the wildfire season (May 10–October 20) or during any other wildfire season ordered by a local, state, or federal jurisdiction, IPC, including those working on IPC's behalf, will equip at least 1 on-site vehicle with firefighting equipment, including, but not limited to:
  - a) Fire suppression hand tools (i.e. shovels, rakes, Pulaski's, etc.),
  - b) a 16-20-pound fire extinguisher,
  - c) a supply of water, sufficient for initial attack, with a mechanism to effectively spray the water (i.e. backpack pumps, water sprayer, etc.). This requirement to carry water is dependent on the vehicle type and weight restrictions. For example, a mini-excavator would not be required to carry water since there is no safe way to do so, or a loaded bucket truck may not be required to carry water because of weight limitations.
- At a minimum, equip each truck that will be driven in the WRZs during wildfire season with at least:
  - a) One round, pointed shovel at least 8-inches wide, with a handle at least 26 inches long
  - b) One axe or Pulaski with a 26-inch handle or longer
  - c) A combination of shovels, axes, or Pulaskis available to each person on the crew

- d) One fire extinguisher rated no less than 2A:10BV (5 pounds)
- e) 30-200 gallons of water in a fire pumper and 5-gallon back packs

IPC personnel will be trained to use the above tools and equipment to aid in extinguishing a fire ignition before it gets out of control and take action that a prudent person would take to control the fire ignition while still accounting for their own personal safety.

### C. Land Management Agency Restrictions and Waivers

The Environmental Services department will notify operations leadership within Power Supply, Customer Operations and Business Development, and T&D Engineering and Construction of any wildfire related requirements and restrictions orders that are issued by local, state, or federal land management agencies. Typical orders issued each fire season include:

- BLM. During BLM's Stage II Fire Restrictions, IPC's Environmental Services department will obtain an appropriate waiver. Field personnel shall take appropriate precautions when conducting work activities that involve an internal combustion engine, involve generating a flame, involve driving over or parking on dry grass, involve the possibility of dropping a line to the ground, or involve explosives. Precautions include a Fire Prevention Watch Person who will remain in the area for 1 hour following the cessation of that activity. Also, IPC personnel will not smoke unless within an enclosed vehicle, building, or designated recreation site or while stopped in an area at least 3 feet in diameter that is barren or cleared of all flammable materials. All smoking materials will be removed from work sites. No smoking materials are to be discarded.
- State of Oregon Department of Forestry (ODF). Prior to each summer fire season, the ODF issues a "Fire Season Requirements" document that specifies required tools, equipment, and work practices. In addition to State of Oregon lands, IPC has elected to apply these requirements to all work activities taking place on all WRZ, BLM lands, and Forest Service lands within the State of Oregon. Go to <a href="https://www.oregon.gov/ODF/Fire/Pages/Restrictions.aspx">https://www.oregon.gov/ODF/Fire/Pages/Restrictions.aspx</a> for ODF's Fire Season Requirements order.
- Other sites for reference that contain fire restriction orders include:
  - o Oregon—Blue Mountain Interagency Fire Center at <a href="http://bmidc.org/index.shtml">http://bmidc.org/index.shtml</a>
  - o Nevada—Fire Information at <a href="https://www.nevadafireinfo.org/restrictions-and-closures">https://www.nevadafireinfo.org/restrictions-and-closures</a>
  - Montana—https://firerestrictions.us/mt/

#### 4. Prevention—Practices of Field Personnel

### A. General Employee Practices

The below listing includes, but is not limited to, practices and behaviors employees shall incorporate depending on the FPI and level of WRZs during fire season.

- 1. Daily tailboards must include discussion around fire mitigation planning. Discussion topics include, but are not limited to:
  - a. Items 2 through 7 below
  - b. Water suppression
  - c. Hand tools
  - d. Welding blankets
  - e. Mowing high brush areas (weed wacker)
  - f. Watering down the worksite before setting up equipment
- 2. Weather conditions and terrain to be worked shall be considered and evaluated. Items to be considered include, but are not limited to:
  - a. Identify the FPI for the area being worked (see Section 3.2.2)
  - b. Monitor weather forecasts and wind and humidity conditions
  - c. Identify surroundings. i.e., wildland-urban interface, BLM lands, Forest Service lands, proximity to any homes and structures, etc.
  - d. Identify local fire departments and locations
  - e. Evaluate the terrain you are working in (steep or flat)
  - f. Consider whether the work will occur during the day or at night
- 3. Work procedures and tools that have potential to cause a spark or flash shall be considered and evaluated. Items to be considered include, but are not limited to:
  - a. Performing energized work
  - b. Grinding or welding
  - c. Trees contacting electrical conductors
  - d. Hot saws
  - e. Chainsaws
  - f. Weed wackers
  - g. Sawzalls
- 4. Monitoring the worksite throughout the project.

It is imperative that all crews and equipment working in the WRZs areas are continuously monitoring and thoroughly inspecting the worksite throughout the project. This includes prior to leaving the work area for the night or before moving on to the next structure.

5. Employee cooking stoves.

When working in remote locations, often employees bring food that needs to be cooked. Open flames should not be allowed. Cook stoves may be permitted by leadership but special precautions must be followed to use:

- a. The stove or grill must be in good repair and of sturdy construction
- b. Stoves must be kept clean, grease build up is not allowed
- c. Fueling of the stove must follow the fueling procedures when liquid fuels are used
- d. Cooking must be in areas free of combustible materials

### 6. Smoking on the job site.

Carelessly discarded smoking materials can result in wildfire ignition. The following practices shall be followed:

- a. Do not discard any tobacco products from a moving vehicle.
- b. Smoking while standing in or walking through forests or other outdoor areas when IPC's FPI rating is above a Green level is prohibited.
- c. All employees must smoke **only in designated areas** and smoking materials must be disposed of in half filled water bottles or coffee containers half filled with sand. Smoking materials shall not be discarded on any site.

### 7. Post job site inspection.

Final inspection or post-checking the work site for any ignition hazards that may remain is essential to the proper completion of the work and true mitigation of the hazards. Post-checking the work will help ensure the hazards were mitigated and provide a final chance to see if any new hazards or hot spots exist before leaving the work site.

### B. Behaviors Relating to Vehicles and Combustion Engine Power Tools

It is important to consider work procedures, equipment conditions, employee actions, potential causes, and other sources that could lead to fire ignition. Some work practices may be performed on roadways that have little to no risk of fire ignition. Leadership should consider scheduling off-road equipment use during times of green fire risk. Employees should also consider alternative tools, work methods or enhanced suppression tools to reduce the risk or spread of fire.

- 1. Additional heat may bring vegetative materials to an easier point of ignition. This includes, but is not limited to, the following vehicles:
  - a. Pickups, crew cabs, line-beds, buckets trucks (large and small), backhoes, excavators and rope trucks, and any other motorized equipment.

#### 2. Vehicle Procedures:

- a. Inspect all engine exhaust, spark arresters and electrical systems of vehicles used off road, daily for debris, holes or exposed hot components and to ensure that heat shields and protective components are in place.
- b. Conduct inspections of the vehicle undercarriage before entering or exiting the project area to clear vegetation that may have accumulated near the vehicle's exhaust system.
- c. Vehicles shall be parked overnight in areas free from flammable vegetation at a minimum distance of 10 feet.
- d. Vehicles and equipment will not be stationary or in use in areas where grass, weeds or other flammable vegetation will be in contact with the exhaust system.
- e. If there is no other workable option for the location that doesn't include weeds, grass or other flammable vegetation, the vegetation and debris will need to be removed.

- f. Consider using a fire-resistant material such as a welding blanket to cover flammable material to act as a heat shield; fire blankets may be a suitable option to avoid removal of vegetation.
- 3. Hot brakes on vehicles and equipment:
  - a. Park vehicles in areas free of combustible materials.
  - b. Hot brake emergency parking, during times of yellow or red FPI shall be cleared of combustible materials for a distance of at least 10 feet from the heat source.

### 4. Fueling procedures:

- a. Tools or equipment should NOT be fueled while running.
- b. Cool down period must be given to allow equipment time to no longer be considered a fire risk.
- c. Allow for a ten-foot radius from all ignition sources.
- d. Any combustible debris should be cleared from the immediate area.
- e. Never smoke while fueling.
- f. Designate fueling areas for all gas-powered tools.

### 5. Combustion engine power tools:

Poorly maintained or missing spark arrester screens may allow sparks to escape and cause ignition of vegetation. Ensure proper spark arrester screens are in place for the following tools:

- a. Generators
- b. Pony motors
- c. Pumps
- d. Chain saws
- e. Hot saws
- f. Weed eaters
- g. Brush hog

Inspect spark arresters daily; clean or replace when clogged, damaged or missing or remove from service until repaired.

### 5. Reporting

### A. Fire Ignition

All fire ignitions shall be immediately reported to regional or system dispatch. Dispatch will notify local fire authorities. All work shall immediately stop and necessary steps taken to extinguish the fire with available tools, water, and equipment. If the fire gets too large to safely contain or extinguish, ensure all employees are accounted for and get to a safe location.

### B. Fire Reporting

When reporting a fire ignition to regional or system dispatch provide the following information:

- 1. Your name
- 2. Location-reference points including an address, road or street name, cross streets, mountain range, GPS coordinates, as applicable
- 3. Fire information
- 4. Size and behavior of the fire
- 5. Weather conditions

### 6. Training

Each employee who performs work in wildland fire designated zones shall be trained on the content of this document and be required to complete annual refresher courses through the Workday system. Employees are required to complete fire extinguisher and fire shelter training annually as part of the lineman safety compliance. Documentation of all training shall be retained in Workday.

### 7. Roles and Responsibilities

Employee	<ol> <li>Be familiar with the requirements specified in this Plan and operate in accordance with this Plan.</li> <li>Be aware of daily weather forecast and FPI level.</li> <li>Be aware of whether field work will be performed in a WMZ.</li> </ol>
Crew Foreman and Front-Line Leaders  Manager (Regional Operations Manager, Area Manager, T&D Construction Manager)	<ol> <li>Establish expectations to direct report employees they are to be familiar with, and follow, Plan requirements.</li> <li>Ensure the crew or team conducts field operations in accordance with this Plan.</li> <li>Be aware of daily weather forecast and FPI level (by viewing the FPI dashboard or by calling into dispatch or a leader):         <ul> <li>a) Ensure employees are aware of the FPI level.</li> <li>b) Ensure work practices comply with this Wildland Fire Preparedness and Prevention Plan when the FPI is "Red" and the WMZ is Yellow.</li> <li>c) Ensure no work takes place when FPI is "Red" and the WMZ is Red. Any exceptions to be discussed with manager.</li> </ul> </li> <li>Ensure annual training of employees is completed prior to wildfire season.</li> <li>Ensure required tools and equipment are in place prior to wildfire season.</li> <li>Establish expectations to Crew Foremen and Front-Line Leaders they are to operate in accordance with Plan requirements.</li> <li>Support Crew Foremen and Front-Line Leaders in scheduling training and making required tools and equipment available.</li> <li>View daily weather forecast and FPI dashboard:         <ul> <li>a) Authorize any exceptions to working when FPI is "Red" and the WRZ is Red.</li> <li>b) Ensure specified audits are timely completed.</li> </ul> </li> </ol>
Meteorology Department	Provide daily weather forecast and update the FPI dashboard contained within the IPC Enviro Viewer.
Environmental Services Department	<ol> <li>Monitor local, state, and federal land management agencies for any wildfire restriction orders that are issued.</li> <li>Communicate content of any orders issues to Power Supply, COBD, and PEC operations leadership.</li> </ol>
Operations Procurement Department	<ol> <li>Ensure contractors have a copy of this Plan and that contractual requirements are in place to ensure adherence to the Plan.</li> </ol>
Vice-President of Planning, Engineering and Construction (VP of PEC)	<ol> <li>Ensure annual review/update of this Plan is conducted following the completion of each wildfire season.</li> </ol>

#### 8. Audit

Prior to the start of wildfire season (May 10), all vehicles will be audited by leadership to ensure that those working in WRZs are properly equipped with firefighting equipment. The following checklist must be completed, dated, and signed by a member of leadership (front-line supervisor or above) and kept with the crew or individual until fire season has ended (Oct 20). A copy of each audit checklist shall be sent to the respective manager and senior manager.

Wildland Fire	e Preparedness	<b>Audit Checklist:</b>
---------------	----------------	-------------------------

Inspector: _	 	
Signature:	 	
Date:	 	
Crew:		

#### Crew:

At least 1 vehicle will be equipped with the following:

- Fire suppression hand tools (shovels, Pulaski, axes, etc.) for each member of the crew
- A 16–20-pound fire extinguisher (2-10-pound fire extinguishers)
- A supply of water, sufficient for initial attack, with an effective spraying mechanism (i.e., backpack pumps, water sprayer, etc.)
- 30–75-gallon mechanical fire pumper

#### **Individual Truck:**

- One round, pointed shovel at least 8-inches wide, with a handle at least 26 inches long
- One axe or Pulaski with a 26-inch handle or longer
- A combination of shovels, axes, or Pulaskis to each person on the crew
- One fire extinguisher rated no less than 2A:10BV (5 pounds)
- 30-200 gallons of water in a fire pumper and 5-gallon back packs

# Personal protective equipment (PPE) IPC and BLM standards: Each employee will be required to have the following PPE:

- Hard hat with a chin strap
- Safety glasses
- Hearing protection
- Long sleeve FR shirt FR pants
- Leather gloves
- Exterior leather work boots 8" high lace type with Vibram type soles
- Fire shelter

Appendix B
The Public Safety Power Shutoff (PSPS) Plan.



Idaho Power Company's Wildfire Public Safety Power Shutoff Plan

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# 1. Introduction

Wildfires in the Pacific west have increased in their intensity in recent years. In an effort to keep Idaho Power's customers and the communities it serves safe and continue improving the resiliency of Idaho Power's transmission and distribution facilities, Idaho Power implemented a Wildfire Mitigation Plan in 2021, focused on situational awareness, field personnel safety practices and operational wildfire mitigation strategies to prevent the accidental ignition of wildfires. As part of its operational mitigation practices, Idaho Power has developed this Public Safety Power Shutoff Plan (PSPS Plan or Plan) to proactively de-energize electrical facilities in identified areas of extreme wildfire risk to reduce the potential of those electrical facilities becoming a wildfire ignition source or contributing to the spread of wildfires. This Plan identifies the relevant considerations, process flow and implementation protocol before, during and after a PSPS event. The Plan will be active during wildfire season and reviewed annually and updated as necessary prior to the start of the next wildfire season.

This Plan identifies PSPS implementation considerations and responsibilities for different Idaho Power departments before, during and after PSPS events. Table 2 describes the different phases Idaho Power will use during PSPS events and Figure 7 depicts the communication audiences and timeline Idaho Power will ideally follow during an event. Finally, this Plan describes activities Idaho Power will undertake to prepare and improve the Plan over time, including interactions with local emergency agencies, and briefly describes the financial administration of the Plan.

Page 1

#### 2. LIST OF ACRONYMS

**AAR**—After Action Review

**BLM**—Bureau of Land Management

**COO**—Chief Operations Officer

**ECMWF**—European Centre for Medium-Range Forecasts

**EMT**—Emergency Management Team

**ERC**—Energy Release Component

**F100**—100-Hour Fuel Moisture

FPI—Wildfire Mitigation Plan Fire Potential Index

FWW—Fire Weather Watch

**GBCC**—Great Basin Coordination Center

**GIS**—Geographic Information System

**IPUC**—Idaho Public Utility Commission

**IRWIN**—Integrated Reporting of Wildland-Fire Information

**LSO**—Load Serving Operations

**NIFC**—National Interagency Fire Center

**NOAA**—National Oceanic and Atmospheric Administration

**NWS**—National Weather Service

**OPUC**—Oregon Public Utility Commission

**PEC**—Planning, Engineering and Construction

**PSPS**—Public Safety Power Shutoff

RFW—National Weather Service issued Red Flag Warning

SGM—Smart Grid Meter

**SME**—Subject Matter Expert

**T&D**—Transmission & Distribution

TDER—Transmission & Distribution Engineering and Reliability

**UKMET**—United Kingdom Meteorological Office

**WMP**—Wildfire Mitigation Plan

WRF—Weather Research and Forecasting

#### 3. DEFINITIONS

- (1) Critical Facilities—Refers to the facilities identified by Idaho Power that, because of their function or importance, have the potential to threaten life safety or disrupt essential socioeconomic activities if their services are interrupted.
- (2) ESF-12—Refers to Emergency Support Function-12 and is the Idaho Power Company liaison from the State Office of Emergency Management for energy utilities issues during an emergency for both Idaho and Oregon.<sup>1</sup>
- (3) Exercise—Refers to planned activities and assessments that ensure continuity of operations, provide and direct resources and capabilities and gather lessons-learned to develop core capabilities needed to respond to incidents.
- (4) Community—Refers to a group of people that share goals, values and institutions.<sup>2</sup>
- (5) Local Emergency Manager—Refers to a jurisdiction's role that oversees the day-to-day emergency management programs and activities.<sup>3</sup>
- (6) Public Safety Partners—As defined by Idaho Power refers to ESF-12, Local Emergency Management and Idaho's and Oregon's Department of Human Services (or equivalent).
- (7) Public Safety Power Shutoff or PSPS—A proactive de-energization of a portion of an Electric Utility's electrical network, based on the forecasting of and measurement of extreme wildfire weather conditions.

<sup>&</sup>lt;sup>1</sup> Federal Emergency Management Institute (FEMA) National Response Framework (NRF) Emergency Support Functions (ESF) National Response Framework | FEMA.gov.

<sup>&</sup>lt;sup>2</sup> FEMA definition under "Communities" (pg. 26) National Response Framework (fema.gov).

<sup>&</sup>lt;sup>3</sup> FEMA definition under "Local Government" (pg. 29) National Response Framework (fema.gov).

#### 4. Public Safety Power Shutoff Overview

In recent years, the western United States (U.S.) has experienced an increase in the intensity of wildland fires (wildfires). A variety of factors have contributed in varying degrees to this trend, including climate change, increased human encroachment in wildland areas, historical land management practices and changes in wildland and forest health. Recent events in western states have increased awareness of electric utilities' role in wildfire prevention and mitigation.

In an effort to keep Idaho Power's customers and the communities it serves safe and continue improving the resiliency of Idaho Power's transmission and distribution (T&D) facilities, Idaho Power implemented a Wildfire Mitigation Plan (WMP) in 2021 focused on situational awareness, field personnel safety practices and operational wildfire mitigation strategies. As part of its operational mitigation practices, Idaho Power developed this Wildfire Public Safety Power Shutoff Plan (PSPS Plan or Plan) to proactively de-energize electrical facilities in identified areas of extreme wildfire risk to reduce the potential of those electrical facilities becoming a wildfire ignition source or contributing to the spread of wildfires. Based on the inherently disruptive nature of power outages, Public Safety Power Shutoff (PSPS) events must be carefully evaluated under this Plan to balance wildfire risk with potential PSPS impacts on Idaho Power customers and the communities it serves.

The unpredictable nature of wildfire and weather patterns create significant challenges with forecasting PSPS events. Real-time evaluations and decision-making are therefore critical in making PSPS determinations and, depending on the associated wildfire risk, those determinations may result in proactive de-energization in areas not originally anticipated.

# 5. SCOPE

This PSPS Plan identifies the relevant considerations, process flow and implementation protocol before, during and after a PSPS event. The Plan will be active during wildfire season and reviewed and updated annually as necessary prior to the start of the next wildfire season. Wildfire season (also known as "closed season") is defined by Idaho Code § 38-115 as extending from May 10 through October 20 each year, or as otherwise extended by the Director of the Idaho Bureau of Land Management (BLM). Oregon's wildfire season generally aligns with Idaho's wildfire season and is designated by the State Forester each year pursuant to Oregon Revised Statute 477.505.

#### 6. KEY TENETS

- Advancing the safety of Idaho Power employees, customers and the general public
- Collaborating with key external stakeholders (agencies, counties, local governments, public safety partners, first responders)

- Minimizing both potential wildfire risk and power outage impacts on communities and customers
- Maintaining reliable electric service

#### 7. WILDFIRE ZONES

Idaho Power's WMP identifies areas of heightened wildfire risk within its service territory reflected by the following risk zones:

- Tier 2 Yellow Risk Zones are deemed increased risk areas.
- Tier 3 Red Risk Zones are deemed higher risk areas.

In its WMP, Idaho Power identifies operational practices specific to these zones of heightened wildfire risk for purposes of (1) reducing potential wildfire risk associated with Idaho Power's T&D facilities and field operations, and (2) improving the resiliency of the Idaho Power's T&D system impacted by wildfire. This PSPS Plan sets forth Idaho Power's PSPS evaluation criteria and processes, including operational and communication protocol, for implementing a PSPS.

#### 8. PSPS IMPLEMENTATION CONSIDERATIONS

Idaho Power will initiate a PSPS if the company determines a combination of critical conditions indicate the T&D system at certain locations is at an extreme risk of being an ignition source and wildfire conditions are severe enough for the rapid growth and spread of wildfire. Idaho Power will evaluate as a whole (not relying on one single factor but a combination of all factors), without limitation, the criteria set forth in 9.1–9.17 below.

#### 8.1. Fire Potential Index

In addition to the Risk Zone designations in its WMP, Idaho Power developed a Fire Potential Index (FPI) to forecast wildfire potential across Idaho Power's service area. The FPI converts data on weather; prevalence of fuel (shrubs, trees, grasses); and topography into a numerical FPI score to forecast the short-term wildfire threat in geographical areas throughout Idaho Power's service area. FPI scores range from 1 (very green, wet fuels with low to no wind and high humidity) to 16 (very brown and dry, both live and dead dry fuels with low humidity and high temperatures). FPI scores are grouped into the following 3 index levels:

1) Green—lower fire potential: FPI score of 1 through 11

2) Yellow—elevated fire potential: FPI score of 12 through 14

3) Red—highest fire potential: FPI score of 15 and 16

The FPI supports operational decision-making to reduce potential wildfire risk. During wildfire season, Idaho Power will determine a daily FPI as described in Section 5.2 of the WMP. The FPI

forecast is broken into four 6-hour time periods throughout each seven-day forecast. FPI information is provided via email, certain Geographic Information System (GIS) viewers and an FPI dashboard accessible to both Idaho Power employees and contractors from Idaho Power's website. The WMP details operational mitigation efforts in Red Risk Zones when the FPI score in that Red Risk Zone is also Red, including stopping planned work and changing distribution protection operations. A Red FPI score will be a consideration in Idaho Power's determination of whether to initiate a PSPS.

# 8.2. National Weather Service Red Flag Warning

A Red Flag Warning (RFW) is a forecast warning issued by the National Weather Service (NWS) to inform the public, firefighters and land management agencies that conditions are ideal for wildland fire combustion and rapid spread. RFWs are often preceded by a Fire Weather Watch (FWW), which indicates weather conditions that could occur in the next 12–72 hours. The NWS has developed different zones across the nation for providing weather alerts (such as RFWs) to more discrete areas. These zones are shown on this NWS webpage: Fire Weather. RFWs for Idaho Power's service territory include Idaho Zones (IDZ) 401, 402, 403, 413, 420 and 422; and Oregon Zones (OR) 636, 637, 642, 634, 644, 645 and 646; and are monitored and are factored into Idaho Power's determination of whether to initiate a PSPS. Boise and Pocatello NWS offices will not issue RFWs if fuels are moist and fire risk is low. The following thresholds are used by most NWS offices:

- Daytime:
  - Relative humidity of 25% or less
  - Sustained winds greater than or equal to 10 miles per hour (mph) with gusts greater than or equal to 20 mph over a four-hour time period
- Nighttime:
  - Relative humidity of 35% or less
  - Sustained winds greater than or equal to 15 mph with gusts greater than or equal to 25 mph over a three-hour time period
- Lightning:
  - The NWS rarely issues RFWs for lightning in the western United States. For this to occur, the Lightning Activity Level—a measure of lightning potential specifically as it relates to wildfire risk—needs to be at 3 or higher.

#### 8.3. NWS Fire Weather Forecasts

The NWS provides detailed forecasts for the different weather zones with an emphasis on fire weather indicators (wind speed, relative humidity, lightning potential). A discussion

summarizing the weather patterns and highlighting fire threats is included in their extended forecast.

# 8.4. Publicly Available Weather Models

Idaho Power's Atmospheric Science department uses the following weather models to predict weather timing, duration and intensity:

- <u>Pivotal Weather Link</u> (<u>pivotalweather.com/model.php</u>): Provides numerical weather data, including a NWS blend of models, European Centre for Medium-Range Weather Forecasts (ECMWF), United Kingdom Meteorological Office weather service information and GOES-16 satellite information.
- <u>Graphical Weather Link (graphical.weather.gov/sectors/conusFireWeek.php</u>): A NWS website providing weather, water and climate data, forecasts and warnings for the United States for the protection of life and property. The Fire Weather page provides a daily and weekly view of multiple weather and environmental conditions influencing wildfire activity.

#### 8.5. Idaho Power Weather Model

Idaho Power maintains its own Weather Research and Forecasting (WRF) model using high-resolution data from Idaho Power's weather stations across its service area. This model, along with publicly available weather models, helps develop weather forecasts that include timing, duration and intensity of weather systems. An Idaho regional WRF low-resolution map view is available to the public at atmo.boisestate.edu/view/.

#### 8.6. Storm Prediction Center Fire Weather Outlooks

The Storm Prediction Center's <u>Fire Weather Outlook</u> provides a current, one-day-ahead and three- to eight-day forecast for wildfires over the contiguous United States. This forecast takes into account pre-existing fuel conditions combined with predicted weather conditions that result in a significant risk of wildfire ignition or spread.

# 8.7. Current Weather Observations

Identifying real-time wildfire weather and associated risks requires predicting conditions that could trigger a PSPS based on observing current weather conditions. Resources available for observing current weather conditions include direct, real-time data from Idaho Power's network of weather stations, available real-time wind speed information from Idaho Power's network of Smart Grid Meters (SGM), as well as <a href="Windy: Wind Map and Weather Forecast">Windy: Wind Map and Weather Forecast</a> and the National Weather Service National Oceanic and Atmospheric Administration's (NOAA) <a href="Weather and Hazards Viewer">Weather and Hazards Viewer</a>.

# 8.8. National Significant Wildland Fire Potential Forecast Outlook

The National Significant Wildland Fire Potential Forecast Outlook provides wildland fire expectations for the current month, the following month and a seasonal look at the two months beyond that. The main objective of this tool is to provide information to fire management decisionmakers for proactive wildland fire management, reducing firefighting costs and improving firefighting efficiency.

# 8.9. Great Basin Coordination Center Morning Briefing

The Great Basin Coordination Center (GBCC) is the focal point for coordinating the mobilization of resources for wildland fire and other incidents throughout the Great Basin Geographic Area, which encompasses Utah, Nevada, Idaho south of the Salmon River, the western Wyoming mountains and the Arizona Strip. The GBCC hosts a morning briefing (around 10 a.m. most mornings) that provides situational awareness for Idaho Power's service area.

#### 8.10. GBCC Current and Predicted ERC and F100

The GBCC as described above also provides <u>day-ahead</u> Energy Release Component (ERC), 100-Hour Fuel Moisture (F100) and other fuels conditions information that helps Idaho Power understand wildfire potential in the service area.

# 8.11. Agency Input

Idaho Power works with Boise NWS Fire Forecasters through daily briefings and NIFC Predictive Service Forecasters on an as-needed basis, generally regarding data clarification, to streamline the transfer of data, information and communications about wildland fire critical to Idaho Power's service area.

Idaho Power works with other agencies, including the U.S. BLM and U.S. Forest Service, as wildland fires approach and impact Idaho Power T&D facilities.

# 8.12. De-Energization Windspeed Considerations

Idaho Power's service area covers 24,000 square miles across southern Idaho and eastern Oregon. The environmental factors across this area vary drastically from high desert landscape to mountainous terrain. Weather and environmental conditions also vary greatly within this area. Regional vegetation becomes "conditioned" to withstand different environmental conditions, which also influences de-energization thresholds. Idaho Power developed windspeed considerations, which it will continue to refine with additional data and weather technology based on historic wind conditions compared to system outage information.

# 8.13. Engineering Assessment

Idaho Power follows robust transmission and distribution maintenance and inspection practices. When a potential PSPS event is identified, Idaho Power's T&D Maintenance and Engineering department will evaluate potential impacts to current or planned maintenance activities.

#### 8.14. Alternative Protective Measures

Considering the significant potential impact of a PSPS to customers, Idaho Power will thoroughly evaluate other potential alternatives for reducing wildfire risk prior to implementing a PSPS.

#### 8.15. Real-time Field Observations

Idaho Power uses SGMs for various purposes on its the distribution systems, including communication (where available) to provide near real-time information and to detect wind speed with anemometers. This information is displayed on a GIS viewer and used to inform Idaho Power's evaluation and decision-making during storm events.

Idaho Power may also deploy field personnel to evaluate if a PSPS event should be initiated.

#### 8.16. Other

Idaho Power plans to evaluate expanding existing capabilities to enhance weather forecasting and add new capabilities to detect fires.

# 9. RESPONSIBILITIES

Developing and implementing PSPS protocol involves various groups throughout the company. Below is a non-exhaustive list of responsibilities by department, representatives of which will work together to promote organized, consistent and safe implementation of PSPS events.

#### 9.1. Load Serving Operations

- Develop and implement safe and reliable power shutoff protocols and procedures
- Ensure System and Regional Dispatch employees are appropriately trained to perform relevant responsibilities under this PSPS Plan, and that such employees receive timely information regarding wildfire risk and weather conditions for purposes of performing those responsibilities in the event of a PSPS
- Assist with PSPS evaluation and decision-making

- Safely restore service to PSPS areas when notified by Customer Operations it is safe to re-energize
- Provide required notifications to public safety partners to enhance public safety
- Participate in After-Action Reviews (AAR) (further discussed in Section 13 below) and ensure modifications to PSPS protocol are implemented as necessary

# 9.2. Atmospheric Science

- Monitor daily, weekly and long-term weather forecasts
- Monitor fuels conditions and trends
- Monitor Fire Weather Watches, Red Flag Warnings and High Wind Watches and Warnings
- Communicate with external agencies for increased situational and conditional awareness. Increase communications as conditions require
- Communicate internally to Idaho Power's Transmission & Distribution Engineering and Reliability (TDER) senior manager when extreme conditions indicate a PSPS event is likely
- Support PSPS activities such as planning, training and exercises
- Assist in PSPS information-gathering, evaluation and decision-making
- Participate in AARs and ensure modifications to PSPS protocol are implemented as necessary

# 9.3. TDER Senior Manager

- Oversee wildfire mitigation program and support cross-departmental collaboration
- Monitor daily, weekly and long-term weather and wildfire forecasts
- Monitor Fire Weather Watches, Red Flag Warnings and High Wind Watches and Warnings
- Develop and lead training modules for PSPS implementation
- Activate the PSPS Assessment Team if a PSPS is likely
- Communicate with Oregon and Idaho ESF-12

- Ensure PSPS activities such as operations planning, training and exercises occur annually
- Ensure a coordinated and cohesive external and internal communication and notification plan is in place and reviewed annually
- Coordinate with Atmospheric Science to continue evaluating enhancements to situational awareness capabilities
- Participate in AARs and provide input on, and monitor as necessary, modifications to PSPS protocol

# 9.4. Customer Operations and T&D Construction

- Develop and implement safe and reliable power shutoff protocols and procedures
- Ensure field personnel are appropriately trained to perform all relevant responsibilities under this PSPS Plan
- Assist in PSPS information-gathering, evaluation and decision-making
- Ensure crews and equipment are available to support PSPS events
- Perform field observations, line patrols and other PSPS tasks as necessary
- Perform required repairs to safely re-energize the system after a PSPS event
- Request/obtain air patrol contractors for line inspections as required
- Participate, with assistance from Corporate Communications, in Idaho Power's general external education campaign
- Develop, with assistance from Corporate Communications, a cohesive notification framework with public safety partners while consistently evaluating ways to increase communication and outreach effectiveness
- Engage with public safety partners and critical facilities before, during and after a PSPS event
- Participate in AARs and ensure modifications to PSPS protocol are implemented as necessary

# 9.5. Supply Chain/Stores

• Ensure preparedness for wildfire season with materials readily available for restoration purposes

- Work with Customer Operations and T&D Construction in response to a PSPS event, which could include pre-event activities such as staging materials and supplies
- Participate in AARs and ensure modifications to PSPS protocol are implemented as necessary

# 9.6. Fleet/Equipment Resource Pool

- Ensure employees are appropriately trained to perform all relevant responsibilities under this PSPS Plan
- Ensure readiness of employees and resource pool equipment for a PSPS event
- Participate in AARs and ensure modifications to PSPS protocol are implemented as necessary

# 9.7. Supply Chain Contracting

- Ensure contract resources are appropriately trained to perform all relevant responsibilities under this PSPS Plan
- Work with Customer Operations to provide contracting resources as required
- Participate in AARs and ensure modifications to PSPS protocol are implemented as necessary

# 9.8. Substation Operations

- Monitor substations and perform actions to support PSPS operations
- Coordinate activities with Dispatch and Customer Operations
- Participate in AARs and ensure modifications to PSPS protocol are implemented as necessary

# 9.9. Corporate Communications

Corporate Communications will develop and execute PSPS communications to Idaho Power customers and employees and support other business units in their communication efforts with regulators, critical facility operators, public safety partners and other stakeholders.

Corporate Communications will:

- In coordination with Customer Operations and Regulatory Affairs, work with public safety partners, critical facilities, regulators and other stakeholders to develop a comprehensive, coordinated and cohesive customer notification framework.
- With input from public safety partners, develop and implement a wildfire education and awareness campaign focused on wildfire prevention and mitigation, PSPS awareness and outage preparedness for customers.
- In the event of a PSPS:
  - To the extent possible and in coordination with Customer Service and IT, notify customers before, during and after a PSPS event with the following information:
    - Expected timing and duration of the PSPS event
    - 24-hour contact information and website resources
  - Provide up-to-date information on a dedicated Idaho Power PSPS webpage prominently linked on the Idaho Power homepage.
  - Distribute information via media and social media channels.
- Participate in AARs and modify communication practices as necessary.

# 9.10. Distribution Engineering and Reliability

- Support Dispatch and Customer Operations in developing de-energization and re-energization plans for PSPS events
- Monitor and verify the protection system operated correctly after any device operations caused by events on the circuit as appropriate
- Evaluate and enact protective device setting changes as required.
- Support rapid repairs of damaged infrastructure as needed.
- Support Load Serving Operations in planning improvements to PSPS operational capabilities
- Participate in AARs and ensure modifications to PSPS protocol are implemented as necessary

# **9.11. Safety**

- Ensure the safety professionals are appropriately trained to perform all relevant responsibilities under this PSPS Plan
- Provide PSPS training for field personnel
- Assist in AARs after a PSPS event (or potential event in which the PSPS Team is activated)

# 9.12. Vegetation Management

- Following de-energization, and when it is safe to do so, Customer Operations will report impacts to infrastructure and assets from vegetation, as appropriate.
   Vegetation Management will then work toward removing vegetation debris necessary for re-energization.
- Ensure contractors and field personnel are appropriately trained to perform all relevant responsibilities under this PSPS Plan.
- Use reasonable efforts to ensure contract resources are available and prepared for PSPS events.
- Participate in AARs and ensure modifications to PSPS protocol are implemented as necessary.

# 9.13. Geographic Information Systems

- Work with Customer Operations and Corporate Communications to develop PSPS boundary information for PSPS GIS maps required for the PSPS website
- Before wildfire season and during preliminary notifications of a potential PSPS event, provide relevant GIS data within the confines of applicable law to public safety partners

#### 9.14. Customer Service

- Respond to customer calls and respond to questions with information provided by Corporate Communications
- Ensure customer service representatives are trained to manage customer interactions during a PSPS event

# 9.15. Communication Systems (Stations)

- Provide monitoring and on-call presence for the following:
  - Radio communications and infrastructure
  - Network infrastructure and connectivity
  - SCADA communications
- Ensure readiness to deploy mobile 2-way radio trailer during a PSPS event
- Participate in AARs and ensure modifications to PSPS protocol are implemented as necessary

# 9.16. Customer Operations Support

May lead AARs to ensure modifications to PSPS protocol are implemented as necessary

# 9.17. Legal

- Provide legal guidance in evaluating a potential PSPS event
- May direct AARs after a PSPS event (or potential event in which the PSPS Team is activated)
- May be involved in reviewing communications to customers, public safety partners and critical facilities

#### 9.18. Regulatory

- May provide regulatory guidance in evaluating a potential PSPS event
- May be involved in reviewing communications to customers, public safety partners and critical facilities
- Assist in/direct regulatory reporting/filing activities

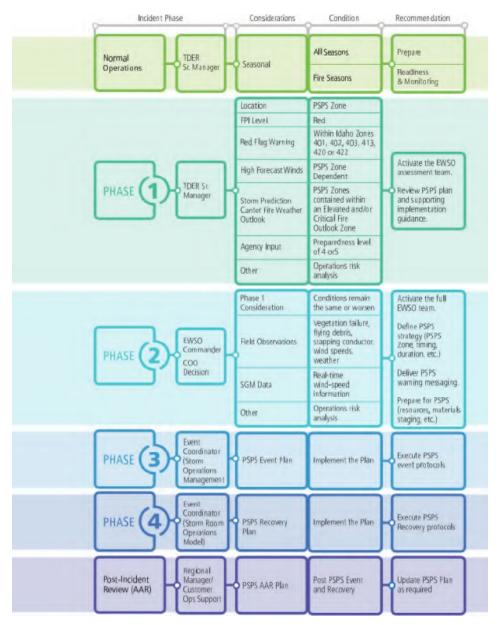
#### 10. PSPS OPERATIONS

#### 10.1. General

Section 11 details the phases, and protocol within each phase, of a PSPS event. Additional procedures are found in plans linked below and the attached Appendices as referenced herein.

Table 2 below summarizes the PSPS phases.

**Table 1** Incident phase decision triggers



# 10.2. PSPS Preparedness

PSPS preparedness is a cyclical effort involving Idaho Power, public safety partners, state and local governments, communities and customers. Idaho Power's main objectives of preparedness are: 1) performing wildfire prevention and mitigation activities; and 2) engaging with external public safety partners, critical facilities and communities to develop relationships and provide education to safely and effectively implement this plan. The TDER senior manager coordinates and facilitates activities of multiple Idaho Power business units for wildfire prevention and mitigation activities while Customer Operations and Corporate Communications facilitates public outreach and coordination efforts with external stakeholders.



Figure 1
PSPS Preparedness Cycle

Idaho Power's goal is to take a community approach to wildfire preparedness by educating and encouraging individual preparedness and relying on existing protocols and procedures currently available through local governments and emergency response professionals.

# 10.2.1. Idaho Power Programs

Idaho Power's <a href="WMP">WMP</a> facilitates PSPS preparedness through vegetation management protocol specific to wildfire season, distribution and transmission hardening efforts, situational awareness coinciding with wildfire operational protocol, training programs, communications strategies and coordinated planning with both internal and external stakeholders. This PSPS Plan and emergency response protocol correspond with Idaho Power's WMP preparedness measures in an effort to further reduce wildfire risk consistent with industry best practices and regulatory requirements.

#### 10.2.2. Coordination with Government Entities

Coordination with local government and emergency response entities is critical to Idaho Power's reliance on existing protocols and procedures developed by these external stakeholders. Customer Operations engages in these coordination efforts through ongoing communications and additional activities as required by this Plan. Activities include, without limitation:

- Being a trusted energy advisor to mayors, city managers, county leaders, elected officials and other stakeholders
- Educating and encouraging individual preparedness
- Educating stakeholders about Idaho Power wildfire preparedness and mitigation efforts, PSPS planning and capabilities
- Enhancing relationships with external stakeholders for improving interoperability and wildfire coordination
- Enhancing relationships with community services partnerships

#### 10.2.3. Community Preparedness

Engage with public sector agencies and communities where PSPS events are likely to leverage existing emergency response plans and resources to increase the effectiveness of PSPS communications.

# 10.2.4. Information Sharing

Coordinate with public safety partners in advance of a PSPS event to prepare information needed by these partners and establish communication protocols for critical decision-making before and during a PSPS event, including restoration activities.

#### 10.2.5. Notifications and Emergency Alerts

Collaborate with agencies in advance of PSPS events to allow for use of existing notification methods to communicate effectively during PSPS events.

# 10.2.6. Training and Exercises

Coordinate and participate in tabletop exercises with public safety partners to enhance knowledge of each other's emergency operations for smooth interactions during PSPS events.

#### 10.3. Proactive Communications

Although the size of Idaho Power's service area, geographic and environmental diversity, and unpredictable nature of Idaho and Oregon weather make it challenging, Idaho Power is committed to providing as much advance notice as reasonably possible in preparation for a PSPS event. Table 3 provides Idaho Power's optimal communication timeline for PSPS events, circumstances permitting.

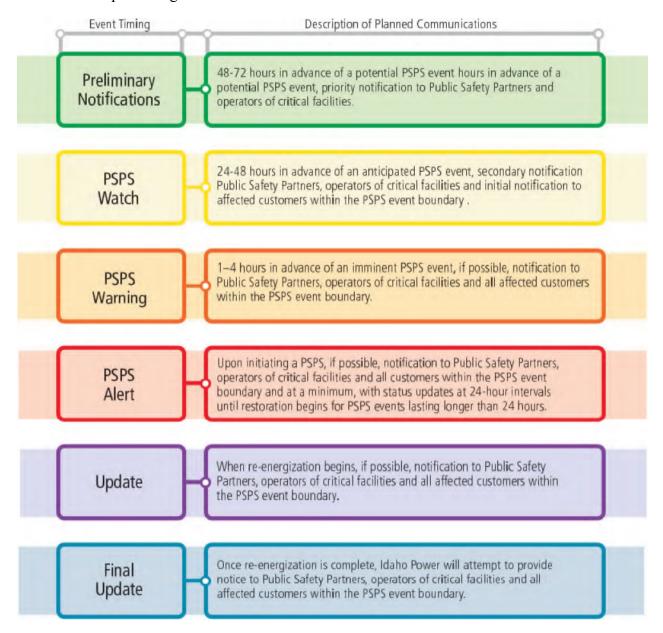


Figure 2
PSPS Event Communication Timeline

# 10.4. Wildfire Season Operations

As described here and in Idaho Power's WMP, normal operations during wildfire season differs from normal operations during the rest of the year based on heightened requirements specifically targeted at predicting and reducing wildfire risk.

#### 10.4.1. Situational Awareness Activities

During wildfire season, Idaho Power closely monitors fire conditions and weather patterns. Idaho Power's Atmospheric Science team prepares a monthly "Seasonal Wildfire Outlook" report beginning in April and continuing through wildfire season containing information on regional drought conditions obtained from the National Drought Monitor, weather and climate outlook, seasonal precipitation and temperature outlooks from NOAA and the NWS, and a regional wildfire outlook.

During wildfire season, the Atmospheric Scientists will determine a daily FPI as described in Section 5.2 of the WMP describing shorter-term weather and fire conditions specific to WMP risk zones across Idaho Power's service territory and in identified risk zones where transmission facilities extend beyond service territory boundaries.

#### 10.4.2. GIS Wildfire Information

Idaho Power's GIS team pulls regional wildfire information from a feature layer sourced by the GIS mapping software company ESRI, which pulls the data from the Integrated Reporting of Wildland-Fire Information (IRWIN) and the National Interagency Fire Center (NIFC). This information is added to multiple GIS viewers utilized by Idaho Power employees. These viewers also overlay current wildfire information to geospatially show physical relationships to transmission and distribution lines which provides valuable situational awareness in understanding wildfire activity near Idaho Power's T&D systems. This information is updated near real-time.

# 10.4.3. Key Grid Interdependent Utilities and Agencies

Idaho Power exchanges dispatch information with key grid interdependent utilities and energy providers to expedite communication and coordination during wildfire events. These contacts include Avista, Bonneville Power Administration, Northwestern Energy, NVEnergy, Oregon Trail Electric Cooperative, PacifiCorp, Raft River Electric, Seattle City Light and U.S. Bureau of Reclamation. Idaho Power also exchanges dispatch information with NIFC, BLM Fire Dispatch and various National Forest Service District Offices—including Idaho Power dispatch receiving BLM and US Forest Service incident command information during wildfire events—to improve communication and coordinate fire-related activities.

#### 10.5. Phase 1

The decision to implement a PSPS event will be based on the best available data for weather and other fire-related conditions as detailed above in Section 8—PSPS Implementation Considerations. Multiple events may require simultaneous management such as other storm-related outages or other PSPS events.

#### 10.5.1. PSPS Assessment Team Activation

Idaho Power will transition from normal wildfire season operations to Phase 1 of a PSPS event at the direction of the TDER senior manager. During Phase 1, Idaho Power will activate the PSPS Assessment Team, which includes the TDER senior manager, a regional senior manager of the area potentially impacted, Load Serving Operations (LSO) senior manager, a documentation subject matter expert (SME), and representatives from the Atmospheric Science team and Corporate Communications. The PSPS Assessment Team will hold conference calls as needed to discuss current and forecasted weather conditions and other critical information regarding a potential PSPS event. The TDER senior manager will facilitate PSPS Assessment Team meetings and conference calls and the PSPS Assessment Team will be responsible for determining whether to recommend maintain Phase 1, escalate to Phase 2, or de-escalate to normal operations. The PSPS Assessment Team will decide if Idaho Power will issue a preliminary notification of a potential PSPS event to public safety partners, critical facilities operators and ESF-12 as described in Table 3 above. During Phase 1, the PSPS Assessment Team will review the PSPS Plan and supporting documents. An operational risk assessment will be performed as well to determine current operational factors (existing outages, facilities under construction, personnel availability, etc.), risks and vulnerabilities. Ultimate determination will be made whether to escalate to Phase 2 by the TDER senior manager. Within one hour of Phase 2 notification, the full PSPS team will be placed on stand-by and team member availability will be determined. The full PSPS team is the PSPS Assessment Team plus the VP of Planning, Engineering and Construction, the Customer Operations VP and VP of Power Supply or their assigns.

# 10.5.2. Community Notifications

Depending on the situation and timing, public safety partners and critical facility operators may be notified during this phase. These notifications may include emails, text messages and/or phone calls as described in Idaho Power internal processes and procedures.

#### 10.6. Phase 2

Phase 2 actions are determined by additional situational awareness activities, timing of forecasted weather events and risk tolerance. Upon transitioning to Phase 2, Idaho Power will provide external notifications as called out in Table 3 above with specific roles and responsibilities as described in internal process and procedure documents.

#### 10.6.1. Activate Event Coordinator

Idaho Power will assign an Event Coordinator as outlined in Wildfire Mitigation and PSPS Plan. The event coordinator's main role is to coordinate activities across the region associated with PSPS implementation and restoration.

#### 10.6.2. Conduct Operational Risk Analysis

The PSPS Assessment Team will present its operational risk analysis recommendation to the VP of PEC, VP of Customer Operations and the COO who will then evaluate the PSPS Assessment Team's recommendation, and the COO will make the final determination of whether to proceed to Phase 3 implementation of a PSPS event.

#### 10.6.3. Request to Delay a PSPS Event

There may be requests to delay proactive de-energization from the public safety partners. This may occur for several reasons, with the most anticipated being loss of power for pumping water to fight wildfires. Delay requests should be routed through dispatch and sent to the PSPS Team for evaluation. The PSPS Team will provide the COO a recommendation on whether to approve the proactive de-energization delay and the COO will make the final decision. As soon as practicable after receiving the request, Idaho Power will notify the ESF-12 liaison of the delay request and basis of such request, as well as the final determination and the underlying justification.

#### 10.6.4. PSPS Event Strategy

Regional operations personnel developed action plans and switching orders as part of their preparedness activities. These plans and switching orders will be reviewed and refined as necessary based on the current and forecasted conditions and will include situation-specific tactics and detailed instructions.

#### 10.6.5. Field Observations and Response Teams

Regional Operations will coordinate field personnel to be mobilized and dispatched to strategic locations, including areas with limited weather and system condition visibility, to perform field observations for on-the-ground, real-time information critical to inform decisions on proactive de-energization. Field observations include—without limitation—conditional assessments of system impacts from wind and vegetation, flying debris and slapping conductors.

#### 10.6.6. Customer and Community Notifications

Depending upon the timing and situation, Idaho Power may use various forms of communication (including media outreach) to provide information and updates to public safety partners, critical facility operators, and customers, particularly those impacted by the PSPS event. Information and updates will include the reason for the potential de-energization, where to find

real-time updates on outage status and other relevant safety and resources. Internal processes and procedures will be followed to ensure accurate, up-to-date communication is provided.

#### 10.7. Phase 3

Upon the COO making a determination to proactively de-energize, the LSO representative of the PSPS Team will inform System and Regional Dispatch Operations and request coordination of the estimated time to begin the PSPS. The regional manager, or their assigned representative of the region in which the PSPS will take place, will coordinate with the event coordinator to pre-position field personnel where manual de-energization is required and to stand by for orders to de-energize. System and Regional Dispatch Operations will implement the PSPS according to their established processes. Stations and communications system operations personnel will be prepared to support PSPS activities as needed. Idaho Power will take the following community-centered actions as soon as safely possible. Regional teams will follow internal processes and procedures to safely and effectively implement a PSPS event.

#### 10.7.1. Customer and Community Notification

Relying on internal processes and procedures, Idaho Power will use various forms of communication (including media outreach) to provide information and updates to customers and other stakeholders, particularly those impacted by the PSPS event. Information and updates will include the reason for the de-energization, where to find real-time updates on outage status and other relevant safety and resource information regarding the PSPS. Specific protocols may be included in individual work group plans.

#### 10.8. Phase 4

# 10.8.1. System Inspections

When it is safe to do so, Idaho Power will begin line patrolling activities to inspect T&D circuits and other potentially impacted Idaho Power facilities. Patrol personnel will report system conditions back to System and Regional Dispatch Operations for coordination with field crews. Patrols will be performed as required to ensure conditions and equipment are safe to re-energize.

#### 10.8.2. Repair and Recovery

Line crews will repair T&D facilities as coordinated with System and Regional Dispatch Operations, replacing damaged equipment and performing other actions to support safe re-energization of the T&D system.

#### 10.8.3. Incident Management Support

Support throughout the PSPS event will continue as described in Idaho Power's Wildfire Mitigation and PSPS Operational Plan. The PSPS Team will continue to monitor fire and weather conditions. Logistics and mutual assistance requirements will be determined and acted upon per existing plans and processes. If timely re-energization is not possible based on the magnitude of the event, the EMT will be notified for additional support.

#### 10.8.4. Communicate PSPS Event Conclusion

Idaho Power will use various forms of communication (including media outreach) to inform customers and other stakeholders, particularly those impacted by the PSPS event, when repairs are complete and it is safe to re-energize the system. This may occur in stages as different feeders or feeder sections are repaired and safe to re-energize. This will be viewable on the outage map on Idaho Power's website during the event. Idaho Power will also leverage existing public agency outreach and notification systems as done at other points in the PSPS process.

#### 10.8.5. Re-energization

Once re-energization activities are completed and service is restored, crews and support staff will demobilize and return to normal fire season operations as described in internal process and procedure documents.

#### 10.9. Post-incident Review

During the PSPS phases the documentation SME will collect and maintain in the Regional Dispatch Operations logs incident information required for reporting purposes.

Following conclusion of a PSPS event, the Regional Manager or their assigned representative will conduct informal, high-level debriefs to identify potential modifications to PSPS protocol based on lessons learned during the event. The regional manager or assigned representative will consolidate the feedback and provide to the documentation SME.

Also following the PSPS event, the TDER senior manager will conduct an AAR with the PSPS Team to identify potential modifications to PSPS protocol based on lessons learned during the event. The TDER senior manager will consolidate the feedback and provide to the documentation SME.

After wildfire season, the Customer Operations support leader may conduct an AAR focusing on operational processes, communications, customer support as well as emergency response and restoration. Idaho Power may also request feedback from external stakeholders on coordination efforts, communications and outreach effectiveness for integration into the AAR report.

#### 11. FINANCIAL ADMINISTRATION

Idaho Power will track expenses related to PSPS events for OPUC and IPUC reporting and potential recovery. Expense should be tracked for the entire PSPS event (Phase 1 through conclusion of the Post-Incident Review and filing the PSPS event report with the OPUC) to include, without limitation, time reporting, equipment and supplies used to set up customer resource centers and provided to customers (e.g., water, ice, etc.)

#### 12. REPORTING

Employees are required to manage information regarding PSPS events pursuant to Idaho Power's Information Retention Policy and underlying standards. Idaho Power will submit reports to the IPUC and OPUC as required.

# 13. AFTER-ACTION REPORT

An AAR is a structured review or de-brief process used to evaluate the effectiveness of the Plan and potential areas for improvement. This process may be performed after a PSPS event and may be confidential at the direction of Legal to improve the PSPS processes and procedures.

#### 14. TRAINING

Idaho Power will strive to provide annual training, prior to or shortly after the beginning of wildfire season, to relevant employees on their respective roles in performing this PSPS Plan.

# 15. EXERCISES

Idaho Power will exercise this PSPS Plan at least annually using various scenarios and testing all or any portion(s) of the Plan which may include:

- Testing text and/or phone alerts with a test group of public safety partners
- Testing tactical operational plans such as reporting field observations or positioning employees at manually operated disconnects to test timing for de-energization and field inspections of T&D assets
- Discussing and/or practicing roles and responsibilities of both strategic and tactical operations, including decision-making handoffs and hypothetical scenarios
- Discussing and/or developing re-energization plans
- Testing capacity limits on incoming and outgoing communications systems

# Attachment 8-1. Property Owners of Record

BAKER BAKER BAKER BAKER								
BAKER BAKER BAKER	MapTaxlot	Owner	Owner2	Owner3	Address	City State	Zip	Map(s)
BAKER BAKER	09S40E00200	HARRELL LAND & CATTLELLC ETAL			42590 SALMON CREEK ROAD	BAKER CITY OR	97814	10
BAKER	09S40E00300	TRINDLE LAND LLC			20859 SUNSET LN	BAKER CITY OR	97814	10
	09S40E00400	WILLIAMS LAND LLC			65579 WOLF CREEK LN	NORTH POWDER OR	97867	10
	09S40E00401	BOOTSMA RANCH LLC			745 CAMPBELL ST	BAKER CITY OR	97814	10
BAKER	09S40E00500	TRINDLE LAND LLC			20859 SUNSET LN	BAKER CITY OR	97814	10
BAKER	09S40E00600	MORRIS LARRY & ROCHELLE TTEE			43010 LINDLEY RD	BAKER CITY OR	97814	10
BAKER	09S40E00700	MORRIS LARRY & ROCHELLE TTEE			43010 LINDLEY RD	BAKER CITY OR	97814	10
BAKER	09S40E01000	USA			FEDERAL BLDG	BAKER CITY OR	97814	10
BAKER	09S40E1100700	TRINDLE LAND LLC			20859 SUNSET LN	BAKER CITY OR	97814	10
BAKER	09S40E1100800	TRINDLE LAND LLC			20859 SUNSET LN	BAKER CITY OR	97814	10
BAKER	09S40E1400100	TREES ASHLEY		O'NEAL JUSTIN	20876 SUNSET LN	BAKER CITY OR	97814	10
BAKER	09S40E1400600	WILLIAMS LAND LLC			65579 WOLF CREEK LN	NORTH POWDER OR	97867	10
BAKER	09S40E1500201	BOOTSMA RANCH LLC			745 CAMPBELL ST	BAKER CITY OR	97814	10
BAKER	09S40E1500202	WILLIAMS LAND LLC			65579 WOLF CREEK LN	NORTH POWDER OR	97867	10
BAKER	09S40E1500500	BOOTSMA RANCH LLC			745 CAMPBELL ST	BAKER CITY OR	97814	10
BAKER	09S40E1500501	YOUNG JEFFERY R & JOHANNA L			PO BOX 953	BAKER CITY OR	97814	10
BAKER	09S40E1500600	EVCR LLC			PO BOX 666	BAKER CITY OR	97814	10
BAKER	09S40E1500601	BOOTSMA WINDMILL PROPERTIES LC			745 CAMPBELL ST	BAKER CITY OR	97814	10
BAKER	09S40E1500602	BOOTSMA WINDMILL PROPERTIES LC			745 CAMPBELL ST	BAKER CITY OR	97814	10
BAKER	09S40E1500603	BOOTSMA IKE			709 NW 7TH AVE NE	DANIA BEACH FL	33004	10
BAKER	09S40E1500700	J R ZUKIN CORP			PO BOX 331	THE DALLES OR	97058	10
BAKER	09S40E15BC00100	LANGRELL RICHARD W & LYNNE D	GURMAA LLC (CP)	C/O GURMAA LLC	175 CAMPBELL ST	BAKER CITY OR	97814	10
BAKER	09S40E15BC00102	HAT BRAND LAND & LIVESTOCK LLC	, ,		PO BOX 1003	BAKER CITY OR	97814	10
BAKER	09S40E15BC00401	BOOTSMA DEVELOPMENT CO LLC			745 CAMPBELL ST	BAKER CITY OR	97814	10
BAKER	09S40E15BC00402	BOOTSMA DEVELOPMENT CO LLC			745 CAMPBELL ST	BAKER CITY OR	97814	10
BAKER	09S40E15BC00600	CHINESE CONSOLIDATED		C/O BAKER CO HISTORICAL SOC	PO BOX 83	BAKER CITY OR	97814	10
BAKER	09S40E15BC00700	LEWIS SUSAN K ETAL		,,	1910 FOLEY ST	LA GRANDE OR	97850	10
BAKER	09S40E2100100	OLIVER THOMAS P & SHARON N			555 AUBURN AVE	BAKER CITY OR	97814	10
BAKER	09S40E2100100	EBELL MARDELLE L TTEE			18012 KOEHLER LANE	BAKER CITY OR	97814	10
BAKER	09S41E00700	MORRIS LARRY & ROCHELLE TTEE			43010 LINDLEY RD	BAKER CITY OR	97814	10
BAKER	09S41E02200	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	10
BAKER	09S41E03800	MORRIS LARRY & ROCHELLE TTEE			43010 LINDLEY RD	BAKER CITY OR	97814	10
BAKER	10S41E00100	MACKENZIE RANCH LLC ETAL			19265 CHANDLER LANE	BAKER CITY OR	97814	10
BAKER	10S41E00300	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	10
BAKER	10S41E00300	NELSON REX D & SUSAN			28509 RITTER LP	BAKER CITY OR	97814	10. 11
BAKER						HERMISTON OR	97838	10, 11
BAKER	10S41E00500 10S41E01900	BROKEN SPUR RANCH LLC			30522 OLDFIELD ST		97814	10, 11
		HAT BRAND LAND & LIVESTOCKLLC		OIO ODEOODY A GAOROO TEE	PO BOX 1003	BAKER CITY OR		
BAKER	10S41E02100	BOBBIE LLC		C/O GREGORY A SACKOS TTEE	1425 CAMPBELL ST	BAKER CITY OR	97814	10, 11
BAKER BAKER	10S41E02101 10S41E02200	BROKEN SPUR RANCH LLC USA BLM			30522 OLDFIELD ST FEDERAL BLDG	HERMISTON OR BAKER CITY OR	97838 97814	10, 11 10, 11
BAKER	10S41E02300	NELSON REX D & SUSAN			28509 RITTER LP	BAKER CITY OR	97814	10, 11
BAKER	10S41E02400	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	10, 11
BAKER	10S41E02500	USA BLM		0.0 0.0.0	FEDERAL BLDG	BAKER CITY OR	97814	10, 11
BAKER	10S41E02600	TROY LYNDIA M ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	10, 11
BAKER	10S41E02700	TROY LYNDIA M ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	10, 11
BAKER	10S41E02800	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	10, 11
BAKER	10S41E02900	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	10, 11
BAKER	10S41E03000	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	10, 11
BAKER	10S41E03200	GS CATTLE RANCH LLC			105609 E WISER PARKWAY	KENNEWICK WA	99338	10, 11
BAKER	10S41E03300	BOBBIE LLC		C/O GREGORY A SACKOS TTEE	1425 CAMPBELL ST	BAKER CITY OR	97814	10, 11
BAKER	10S41E03500	GYLLENBERG BRENT C & EILEEN S			PO BOX 1003	BAKER CITY OR	97814	10
BAKER	10S41E04600	TROY HELEN M TTEE ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	10, 11
BAKER	10S41E04700	TROY LYNDIA M ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	10, 11
BAKER	10S41E23A00100	OREGON STATE OF			955 CENTER ST NE	SALEM OR	97310	10, 11
BAKER	10S41E23A00200	BOBBIE LLC		C/O GREGORY A SACKOS TTEE	1425 CAMPBELL ST	BAKER CITY OR	97814	10, 11
BAKER	10S41E23A00300	BOBBIE LLC		C/O GREGORY A SACKOS TTEE	1425 CAMPBELL ST	BAKER CITY OR	97814	10, 11
BAKER	10S41E23A00400	SAPPE DEAN & JEANETTE			38220 ALDER CREEK RD	BAKER CITY OR	97814	10, 11
BAKER	10S41E23B00100	GS CATTLE RANCH LLC			105609 E WISER PARKWAY	KENNEWICK WA	99338	10, 11
BAKER	10S42E00800	MACKENZIE RANCH LLC ETAL			19265 CHANDLER LANE	BAKER CITY OR	97814	10, 11
BAKER	10S42E01000	BROKEN SPUR RANCH LLC			30522 OLDFIELD ST	HERMISTON OR		10, 11
BAKER	10S42E02600	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	11
BAKER	10S42E02700	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11
BAKER	10S42E02900	TROY HELEN M TTEE ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	11
BAKER	10S42E04100	TROY HELEN M TTEE ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	11
BAKER	10S42E04200	TROY LYNDIA M ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	11
BAKER	10S42E3400100	TROY LYNDIA M ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	11
BAKER	10S42E3400200	TROY LYNDIA M ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	11
BAKER	10S42E3400400	MCCALL LELAND & ROBERTA TTEE			36943 HILL CREEK RD	BAKER CITY OR	97814	11
BAKER	10S42E3400600	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11
	11S41E01002	HANCOCK TIMBERLAND X INC		C/O HANCOCK FOREST MANAGEMENT	17700 SE MILL PLAIN BLVD #180	VANCOUVER WA	98683	11
	11S41E03300	USA BLM		5,5	FEDERAL BLDG	BAKER CITY OR	97814	11, 12
BAKER	11S41E03400	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11, 12
BAKER BAKER	11S42E00200	TROY LYNDIA M ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	11
BAKER BAKER BAKER				JO DINGLIMIDINGLIAN & WATE OFA	PO BOX 115	DURKEE OR	97905	11
BAKER BAKER BAKER BAKER					. 5 DOX 110	DOMMEE OIL		
BAKER BAKER BAKER BAKER BAKER	11S42E00400	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11
BAKER BAKER BAKER BAKER BAKER BAKER	11S42E00400 11S42E00500	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11
BAKER BAKER BAKER BAKER BAKER BAKER BAKER	11S42E00400 11S42E00500 11S42E00600	M R KING RANCHES INC M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11
BAKER BAKER BAKER BAKER BAKER BAKER BAKER BAKER	11S42E00400 11S42E00500 11S42E00600 11S42E00700	M R KING RANCHES INC M R KING RANCHES INC M R KING RANCHES INC		C/O BINGHAMBINGHAM & WATT ODA	PO BOX 115 PO BOX 115	DURKEE OR DURKEE OR	97905 97905	11 11
BAKER BAKER BAKER BAKER BAKER BAKER BAKER BAKER BAKER	11S42E00400 11S42E00500 11S42E00600 11S42E00700 11S42E00800	M R KING RANCHES INC M R KING RANCHES INC M R KING RANCHES INC TROY LYNDIA M ETAL		C/O BINGHAMBINGHAM & WATT CPA	PO BOX 115 PO BOX 115 2055 SECOND ST	DURKEE OR DURKEE OR BAKER CITY OR	97905 97905 97814	11 11 11
BAKER BAKER BAKER BAKER BAKER BAKER BAKER BAKER	11S42E00400 11S42E00500 11S42E00600 11S42E00700	M R KING RANCHES INC M R KING RANCHES INC M R KING RANCHES INC		C/O BINGHAMBINGHAM & WATT CPA	PO BOX 115 PO BOX 115	DURKEE OR DURKEE OR	97905 97905	11 11

County	MapTaxlot	Owner Owner2	Owner3	Address	City State	Zip	Map(s)
BAKER	11S42E01100	MCCALL LELAND & ROBERTA TTEE		36943 HILL CREEK RD	BAKER CITY OR	97814	11
BAKER	11S42E01200	MCCALL LELAND & ROBERTA TTEE		36943 HILL CREEK RD	BAKER CITY OR	97814	11
BAKER	11S42E01300	USA		FEDERAL BLDG	BAKER CITY OR	97814	11
BAKER	11S42E01400	MCCALL LELAND & ROBERTA TTEE		36943 HILL CREEK RD	BAKER CITY OR	97814	11
BAKER	11S42E01500	USA TROVUELENIA TEE ETAL	O/O DINIOLIAMBINOLIAM A MATT ODA	FEDERAL BLDG	BAKER CITY OR	97814	11
BAKER	11S42E01600	TROY HELEN M TTEE ETAL	C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	11
BAKER	11S42E01901	KERBY RANGELAND INC	% LELAND MCCALL	36943 HILL CREEK ROAD	BAKER CITY OR	97814	11
BAKER	11S42E01C00100	OREGON STATE OF		955 CENTER ST NE	SALEM OR	97310	11
BAKER	11S42E02000	EVANS MICHAEL P		475 OAKDALE AVE	SPRINGFIELD OR	97477	11
BAKER	11S42E02200	USA		FEDERAL BLDG	BAKER CITY OR	97814	11, 12
BAKER	11S42E02300	PIERSON BILLE J TTEE		1604 STATE HWY 46	GOODING ID	83330	11
BAKER	11S42E02400	M R KING RANCHES INC		PO BOX 115	DURKEE OR	97905	11
BAKER	11S42E02500	PIERSON BILLE J TTEE		1604 STATE HWY 46	GOODING ID	83330	
							11
BAKER	11S42E02600	BUNCH LEVI A		31413 BURNT RIVER CANYON LN	DURKEE OR	97905	11
BAKER	11S42E02700	M R KING RANCHES INC		PO BOX 115	DURKEE OR	97905	11
BAKER	11S42E02800	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT	17700 SE MILL PLAIN BLVD #180	VANCOUVER WA	98683	11
BAKER	11S42E02900	PIERSON BILLE J TTEE		1604 STATE HWY 46	GOODING ID	83330	11
BAKER	11S42E03000	BUNCH LEVI A		31413 BURNT RIVER CANYON LN	DURKEE OR	97905	11
BAKER	11S42E03100	VAUGHAN FAMILY LAND & CATTLE		PO BOX 965	BAKER CITY OR	97814	11, 12
BAKER	11S42E03200	NYGARD DAVID W & EDNA L		PO BOX 285	DURKEE OR	97905	11, 12
BAKER	11S42E03300	HENDERSON HUGH		3226 SW DOLPH COURT	PORTLAND OR	97219	11, 12
BAKER							
	11S42E03400	ABEL JANET L		1809 26TH ST #41	LAGRANDE OR	97850	12
BAKER	11S42E03500	NYGARD DAVID W & EDNA L		PO BOX 285	DURKEE OR	97905	12
BAKER	11S42E03600	NYGARD DAVID W & EDNA L		PO BOX 285	DURKEE OR	97905	12
BAKER	11S42E03700	BATES BETTY L TTEE		28049 OXMAN RANCH LN	DURKEE OR	97905	12
BAKER	11S42E3100100	LDMA-AU INC		PO BOX 891479	TEMECULA CA	92589	12
BAKER	11S42E3100200	LDMA-AU INC		PO BOX 891479	TEMECULA CA	92589	12
BAKER	11S42E3100300	ASH GROVE CEMENT CO		11011 CODY	OVERLAND PARK KS	66210	12
BAKER	11S42E3100300	ASH GROVE CEMENT CO		11011 CODY	OVERLAND PARK KS	66210	
BAKER							12
	11S43E01200	M R KING RANCHES INC		PO BOX 115	DURKEE OR	97905	11
BAKER	11S43E01300	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	11
BAKER	11S43E02800	BATES BETTY L TTEE		28049 OXMAN RANCH LN	DURKEE OR	97905	11
BAKER	11S43E02900	PIERSON BILLE J TTEE		1604 STATE HWY 46	GOODING ID	83330	11
BAKER	11S43E04200	BUNCH RODD D TTEE ETAL		PO BOX 212	DURKEE OR	97905	11, 12
BAKER	11S43E04300	VAUGHAN KATHRYN (LE)		PO BOX 965	BAKER CITY OR	97814	11, 12
BAKER	11S43E04400	OWEN RICHARD B & GEORGIA TTEE		PO BOX 137	DURKEE OR	97905	11, 12
BAKER		USA BLM				97814	
	11S43E04500			FEDERAL BLDG	BAKER CITY OR		12
BAKER	11S43E3000100	BRINTON MISTY J		2490 D ST	BAKER CITY OR	97814	11
BAKER	11S43E3000300	BUNCH LEVI A		31413 BURNT RIVER CANYON LN	DURKEE OR	97905	11
BAKER	11S43E3000400	VAUGHAN FAMILY LAND & CATTLE		PO BOX 965	BAKER CITY OR	97814	11
BAKER	12S41E00100	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S41E00200	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S42E00100	OWEN RICHARD B & GEORGIA TTEE		PO BOX 137	DURKEE OR	97905	12
BAKER	12S42E00200	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S42E00300	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S42E00400	WYLIE JAMES R IV & MARCELYN L		1676 N CLARENDON WY	EAGLE ID	83616	12
BAKER	12S42E00500	LOST DUTCHMAN'S MINING ASSOC		PO BOX 891479	TEMECULA CA		12
BAKER	12S42E00600	USA		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S42E00700	WYLIE JAMES R IV & MARCELYN L		1676 N CLARENDON WY	EAGLE ID	83616	12
BAKER	12S42E00800	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S42E00900	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S42E00900 12S42E01000	WYLIE JAMES R IV & MARCELYN L		1676 N CLARENDON WY	EAGLE ID	83616	12
BAKER	12S42E01100	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S42E01200	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S42E01300	WYLIE JAMES R IV & MARCELYN L		1676 N CLARENDON WY	EAGLE ID	83616	12
BAKER	12S42E01400	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S42E01500	HAMMOND-PEDRO LLC	C/O TOM HAMMOND	5365 BREWSTER RD	ROCHESTER MI	48306	12
BAKER	12S42E01600	BATES BETTY L TTEE		28049 OXMAN RANCH LN	DURKEE OR	97905	12
BAKER	12S42E01700	HAMMOND-PEDRO LLC	C/O TOM HAMMOND	5365 BREWSTER RD	ROCHESTER MI	48306	12
BAKER	12S42E01700 12S42E02200	VAUGHAN FLOYD JR & KATHRYN	* VAUGHAN MATTIE EST 1/2	PO BOX 965	BAKER CITY OR	97814	12
BAKER	12S42E02300	VAUGHAN FLOYD JR & KATHRYN	* VAUGHAN MATTIE EST 1/2	PO BOX 965	BAKER CITY OR	97814	12
BAKER	12S43E01000	BUNCH JEAN L TTEE		PO BOX 206	DURKEE OR	97905	12, 13
BAKER	12S43E01100	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S43E01200	VAUGHAN FAMILY LAND & CATTLE		PO BOX 965	BAKER CITY OR	97814	12
BAKER	12S43E01201	BUNCH RODD D TTEE ETAL		PO BOX 212	DURKEE OR	97905	12
BAKER	12S43E01300	OWEN RICHARD B & GEORGIA TTEE		PO BOX 137	DURKEE OR	97905	12
BAKER	12S43E01400	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S43E01500	USA BLM				97814	
	12040E0400			FEDERAL BLDG	BAKER CITY OR		12
BAKER	12S43E01600	BUNCH RODD D TTEE ETAL		PO BOX 212	DURKEE OR	97905	12
BAKER	12S43E01700	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	12, 13
BAKER	12S43E01800	ASH GROVE CEMENT CO		11011 CODY	OVERLAND PARK KS	66210	12, 13
BAKER	12S43E01900	ASH GROVE CEMENT CO	ATTN:BOB RALLS	11011 CODY ST	OVERLAND PARK KS	66210	13
BAKER	12S43E02000	ASH GROVE CEMENT CO		11011 CODY	OVERLAND PARK KS	66210	13
BAKER	12S43E02400	OREGON STATE OF (HWY)		HIWAY 117 TRANSPORTATION BLDG	SALEM OR	97310	13
BAKER	12S43E02500	USA BLM		FEDERAL BLDG	BAKER CITY OR	97814	13
BAKER	12S43E02700	HAAS MATHEW F & AMY K TTEE		1970 SAN JUAN RD	AROMAS CA	95004	13
BAKER	12S43E02800	SUITTER NATHAN H & FRANCES F		PO BOX 227	DURKEE OR	97905	13
DAILLI	12S43E02900	SUITTER NATHAN H & FRANCES F		PO BOX 227	DURKEE OR	97905	13
BAKER							
BAKER		HAAS MATHEW F & AMY K TTFF		1970 SAN JUAN RD	AROMAS CA	95004	13
BAKER BAKER	12S43E03000	HAAS MATHEW F & AMY K TTEE		1970 SAN JUAN RD	AROMAS CA	95004 97814	13 12 13
BAKER		HAAS MATHEW F & AMY K TTEE USA BLM USA BLM		1970 SAN JUAN RD FEDERAL BLDG FEDERAL BLDG	AROMAS CA BAKER CITY OR BAKER CITY OR	95004 97814 97814	13 12, 13 12

County	ManTaylot	Owner	Owner2	Owner?	Address	City State	7in	Mon(a)
DAKED	MapTaxlot		Ownerz	Owner3	Address	City State	<b>Zip</b> 97814	Map(s)
BAKER	12S43E03300	USA BLM			FEDERAL BLDG	BAKER CITY OR		12
BAKER	12S43E03400	USA			FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S43E03500	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S43E03600	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S43E03700	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S43E03800	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	12
BAKER	12S43E03900	VAUGHAN FAMILY LAND & CATTLE			PO BOX 965	BAKER CITY OR	97814	12
BAKER	12S43E04000	HAMMOND RANCH #5	DBA THREE VALLEYS RANCH		5365 BREWSTER RD	OAKLAND TWP. MI	48306	12
BAKER	12S43E04100	VAUGHAN FAMILY LAND & CATTLE			PO BOX 965	BAKER CITY OR	97814	12, 13
BAKER	12S43E04300	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	13
BAKER	12S43E04800	BLOOMER GARY E TTEE			2411 MAIN STREET	BAKER CITY OR	97814	13
BAKER	12S43E04900	WICK LAND & CATTLE LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13
BAKER	12S43E05000	HAMMOND RANCH #5	DBA THREE VALLEYS RANCH		5365 BREWSTER RD	OAKLAND TWP. MI	48306	12
BAKER	12S43E05100	HAMMOND-PEDRO LLC		C/O TOM HAMMOND	5365 BREWSTER RD	ROCHESTER MI	48306	12
BAKER	12S43E05200	HAMMOND-PEDRO LLC		C/O TOM HAMMOND	5365 BREWSTER RD	ROCHESTER MI	48306	12
BAKER	12S43E05300	HAMMOND-PEDRO LLC		C/O TOM HAMMOND	5365 BREWSTER RD	ROCHESTER MI	48306	12
BAKER	12S43E05600	BLOOMER GARY E TTEE		O/O TOWNTH WINNOTED	2411 MAIN STREET	BAKER CITY OR	97814	13
BAKER	12S44E02400	WICK LAND & CATTLE LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13
				0.0 70.0 50.0 0.0 0.0 0.0				
BAKER	12S44E02500	OREGON STATE OF (DOT)		C/O TRAVEL INFO COUNCIL	1500 LIBERTY ST SE	SALEM OR	97302	13
BAKER	12S44E02600	WICK LAND & CATTLE LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13
BAKER	12S44E02700	WICK LAND & CATTLE LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13
BAKER	12S44E03000	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	13
BAKER	12S44E03100	DOMAN LINDA J			31222 DOMAN RD	HUNTINGTON OR	97907	13
BAKER	12S44E03300	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	13
BAKER	12S44E1900800	WICK LAND & CATTLE LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13
BAKER	12S44E1900900	WICK LAND & CATTLE LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13
BAKER	12S44E1901100	WICK LAND & CATTLE LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13
BAKER	12S44E30A00100	WICK LAND & CATTLE LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13
BAKER	12S44E30A00500	WICK LAND & CATTLE LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13
	12044E30A00300	WICK LAND & CATTLE LLC						
BAKER	12S44E30A00600	WICK LAND & CATTLE LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13
BAKER	13S43E00100	BLOOMER GARY E TTEE			2411 MAIN STREET	BAKER CITY OR	97814	13
BAKER	13S43E00200	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	12, 13, 14
BAKER	13S43E01500	WICK RANCHES LLC			8421 S TEN MILE ROAD	MERIDIAN ID	83642	13
BAKER	13S43E01600	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	13
BAKER	13S43E01700						83642	13
		WICK RANCHES LLC		OIO TOLLIAN HOUR	8421 S TEN MILE ROAD	MERIDIAN ID		
BAKER	13S44E00600	HAMMOND-PEDRO LLC		C/O TOM HAMMOND	5365 BREWSTER RD	ROCHESTER MI	48306	13
BAKER	13S44E00700	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	13
BAKER	13S44E00800	BLOOMER GARY E TTEE			2411 MAIN STREET	BAKER CITY OR	97814	13
BAKER	13S44E00900	WICK RANCHES LLC			8421 S TEN MILE ROAD	MERIDIAN ID	83642	13
BAKER	13S44E01100	SCHACHT MATTHEW M			28554 RYE VALLEY	HUNTINGTON OR	97907	13
BAKER	13S44E01500	HAMMOND-PEDRO LLC		C/O TOM HAMMOND	5365 BREWSTER RD	DOCUECTED MI	48306	13
						ROCHESTER MI		
BAKER	13S44E01700	HAMMOND-PEDRO LLC		C/O TOM HAMMOND	5365 BREWSTER RD	ROCHESTER MI	48306	13, 14
BAKER	13S44E01801	WICK RANCHES LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13, 14
BAKER	13S44E01900	WICK RANCHES LLC			8421 S TEN MILE ROAD	MERIDIAN ID	83642	13
BAKER	13S44E02000	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	13, 14
BAKER	13S44E02100	SCHAFFELD STEVEN & JERI TTEE			5045 S ROAD K	VALE OR	97918	14
								14
BAKER	13S44E03000	DAVIS GARY R & LOIS A			4362 SAGE RD	ONTARIO OR	97914	
BAKER	13S44E03100	DAVIS GARY R & LOIS A			4362 SAGE RD	ONTARIO OR	97914	14
BAKER	13S44E03200	BUEHLER DEL RAE			PO BOX 328	HUNTINGTON OR	97907	14
BAKER	13S44E03300	WICK RANCHES LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	14
BAKER	13S44E03400	BOKIDES PROPERTIES LLC			PO BOX 28	WEISER ID	83672	14
BAKER	13S44E03500	DAVIS GARY R & LOIS A			4362 SAGE RD		97914	14
						ONTARIO OR		
BAKER	13S44E0400200	LDMA-AUINC			PO BOX 891479	TEMECULA CA	92589	13
BAKER	13S44E0900200	SCHAFFELD STEVEN & JERI TTEE			5045 S ROAD K	VALE OR	97918	13
BAKER	13S44E3400100	DAVIS GARY R & LOIS A			4362 SAGE RD	ONTARIO OR	97914	14
BAKER	13S44E3400200	DAVIS GARY R & LOIS A			4362 SAGE RD	ONTARIO OR	97914	14
BAKER	13S44E3400300	DAVIS GARY R & LOIS A			4362 SAGE RD	ONTARIO OR	97914	14
BAKER	13S44E3400400	OREGON STATE OF (DOT)			955 CENTER ST NE	SALEM OR	97310	14
BAKER					4362 SAGE RD	ONTARIO OR	97914	14
BAKER	14S44E00100	DAVIS GARY R & LOIS A						
	14S44E00400	OREGON STATE OF (HWY)			HWY 117 TRANSPORTATION BLDG	SALEM OR	97310	14
BAKER	14S44E00500	TESORO LOGISTICS NW PIPELINE		ATT: DIRECTOR OF PROPERTY TAX	19100 RIDGEWOOD PKWY	SAN ANTONIO TX	78259	14
BAKER	14S44E00600	HURSH RUSSELL F TTEE			1070 ALAMEDA DR	ONTARIO OR	97914	14
BAKER	14S44E00700	DAVIS GARY R & LOIS A			4362 SAGE RD	ONTARIO OR	97914	14
BAKER	14S44E00800	DAVIS GARY R & LOIS A			4362 SAGE RD	ONTARIO OR	97914	14
BAKER	14S44E01000	DAVIS GARY R & LOIS A  DAVIS GARY R & LOIS A			4362 SAGE RD	ONTARIO OR ONTARIO OR	97914	14
BAKER	14S44E01001	IDAHO POWER CO			PO BOX 70	BOISE ID	83707	14
BAKER	14S44E01100	BOKIDES PROPERTIES LLC			PO BOX 28	WEISER ID	83672	14
BAKER	14S44E01200	BUEHLER DEL RAE			PO BOX 328	HUNTINGTON OR	97907	14
BAKER	14S44E01300	USA			FEDERAL BLDG	BAKER CITY OR	97814	14
BAKER	14S44E01400	USA			FEDERAL BLDG	BAKER CITY OR	97814	14
BAKER	14S44E01900	DAVIS GARY R & LOIS A			4362 SAGE RD	ONTARIO OR	97914	14
BAKER	14S44E02000	USA			FEDERAL BLDG	BAKER CITY OR	97814	14
BAKER	14S44E02100	BUEHLER DEL RAE			PO BOX 328	HUNTINGTON OR	97907	14
BAKER	14S44E02200	BUEHLER DEL RAE			PO BOX 328	HUNTINGTON OR	97907	14
BAKER	14S44E02201	POWER GALE & MICHELE			152 COUNTRY WAY	WALLA WALLA WA	99362	14
BAKER	14S44E02400	OREGON STATE OF (STATE LANDS)		ASSET MANAGEMENT SECTION	775 SUMMER STREET NE STE 100	SALEM OR		14
				, LOSET WINTER CENTER TO SECTION			07040	14
BAKER	14S44E02500	SJ LAND LLC			PO BOX 297	VALE OR	97918	
BAKER	14S44E02600	USA			FEDERAL BLDG	BAKER CITY OR	97814	14
BAKER	14S44E02700	BOKIDES PROPERTIES LLC			PO BOX 28	WEISER ID	83672	14
BAKER	14S44E02800	SJ LAND LLC			PO BOX 297	VALE OR	97918	14
BAKER	14S44E02900	BOKIDES PROPERTIES LLC			PO BOX 28	WEISER ID	83672	14

County	MapTaxlot	Owner	Owner2	Owner3	Address	City State	Zip	Map(s)
BAKER	14S45E00900	BOKIDES PROPERTIES LLC	OWITETZ	OWITETS	PO BOX 28	WEISER ID	83672	14
BAKER	14S45E02200	ABBE TEL REECE & LACEY LEANN			PO BOX 154	WESTFALL OR	97920	14
BAKER	14S45E02300	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	14
BAKER	14S45E02400	ABBE TEL REECE & LACEY LEANN			PO BOX 154	WESTFALL OR	97920	14
BAKER	14S45E02500		BOKIDES PROPERTIES LLC (CP)		PO BOX 28	WEISER ID	83672	14
BAKER	14S45E02600	IDAHO POWER CO	50111520111012111120220(01)		PO BOX 70	BOISE ID	83707	14
BAKER	14S45E02700	ABBE TEL REECE & LACEY LEANN			PO BOX 154	WESTFALL OR	97920	14
MALHEUR	15S44E00100	USA			GEN DEL	WASHINGTON D C	20013	14, 15
MALHEUR	15S44E00100	USA			GEN DEL	WASHINGTON D C	20013	14, 15
MALHEUR	15S44E00200	HOLTZ MANAGEMENT LLC		C/O INOUYESHIVELYKLATTMC	23282 MILL CREEK DR SUITE 200	LAGUNA HILLS CA	92653	14
MALHEUR	15S44E00300	OREGON DEPT OF STATE LANDS		ASSET MANAGEMENT SECTION	775 SUMMER ST NE STE 100	SALEM OR	97301	14
MALHEUR	15S45E00101	IDAHO POWER CO		ACCET WATCHCEMENT CECTICIT	PO BOX 70	BOISE ID	83707	14
MALHEUR	15S45E00102	ABBE TEL REECE & LACEY LEANN			PO BOX 154	WESTFALL OR	97920	14
MALHEUR	15S45E00102	ABBE TEL REECE & LACEY LEANN			PO BOX 154	WESTFALL OR	97920	14
MALHEUR	15S45E00102	ABBE TEL REECE & LACEY LEANN			PO BOX 154	WESTFALL OR	97920	14
MALHEUR	15S45E00500	IISA			GEN DEL	WASHINGTON D C	20013	14, 15
MALHEUR	15S45E01100	STELLAR VENTURES LLC			4522 W SUGAR TREE DR	MERIDIAN ID	83646	15
MALHEUR	15S45E01101	SAENGTHIP SAO & PHONG			16873 BARRYMORE DR	NAMPA ID	83686	15
MALHEUR	15S45E01102	SAENGTHIP SAO & PHONG			16873 BARRYMORE DR	NAMPA ID	83686	15
MALHEUR	15S45E01103	POST ELDON L & PAMELA			5760 LOCKETT RD	HUNTINGTON OR	97907	15
MALHEUR	15S45E01300	USA			GEN DEL	WASHINGTON D C	20013	15
MALHEUR	15S45E01500	GRACE FAMILY TRUST		C/O WILLIAM H & KELLY A GRACE	255 IVY RD	ONTARIO OR	97914	15
MALHEUR	15S45E01600	RUPP WILLIAM F & ROSA M		0,0 11122341111 0 112221 71 010102	420 ROAD 49	PASCO WA	99301	15
MALHEUR	15S45E01700	HOLTZ MANAGEMENT LLC		C/O INOUYESHIVELYKLATTMC	23282 MILL CREEK DR SUITE 200	LAGUNA HILLS CA	92653	15
MALHEUR	15S45E02400	OREGON STATE OF		2. 5 5 . 25 7 EETINEATTING	GEN DEL	SALEM OR	97310	15
MALHEUR	15S45E03400	OREGON STATE OF			GEN DEL	SALEM OR	97310	15
MALHEUR	16S43E01600	DUSTY TRAILS RANCH LLC			2436 11TH AVE E	VALE OR	97918	17
MALHEUR	16S43E01800	SCOTT LIVESTOCK CO			4876 N RD H	VALE OR	97918	17
MALHEUR	16S43E01900	HEID EDWIN G & CHARLAN A			PO BOX 44	JAMIESON OR	97909	17
MALHEUR	16S45E00100	IISA			GEN DEL	WASHINGTON D C	20013	15
MALHEUR	16S45E00100	USA			GEN DEL	WASHINGTON D C	20013	15
MALHEUR	16S45E00100	USA			GEN DEL	WASHINGTON D C	20013	15, 16
MALHEUR	16S45E00100	USA			GEN DEL	WASHINGTON D C	20013	15, 16
MALHEUR	16S45E00100	USA			GEN DEL	WASHINGTON D C	20013	16
MALHEUR	16S45E00105	BETTIS HARRY L			PO BOX 7	EMMETT ID	83617	15
MALHEUR	16S45E00200	BETTIS HARRY L			PO BOX 7	EMMETT ID	83617	15
MALHEUR	16S45E00202	USA			GEN DEL	WASHINGTON D C	20013	15
MALHEUR	16S45E00202	USA			GEN DEL	WASHINGTON D C	20013	15
MALHEUR	16S45E00203	USA			GEN DEL	WASHINGTON D C	20013	15
MALHEUR	16S45E00900	USA			GEN DEL	WASHINGTON D C	20013	15. 16
MALHEUR	16S45E01000	BETTIS HARRY L			PO BOX 7	EMMETT ID	83617	16
MALHEUR	16S45E01002	USA			GEN DEL	WASHINGTON D.C.	20013	16
MALHEUR	16S45E01002	USA			GEN DEL	WASHINGTON D C	20013	16
MALHEUR	16S45E01100	USA			GEN DEL	WASHINGTON D C	20013	16
MALHEUR	16S45E01200	MC BRIDE LEROY			447 RIDGE WAY	ONTARIO OR	97914	16
MALHEUR	16S45E01300	USA			GEN DEL	WASHINGTON D C	20013	16
MALHEUR	16S46E02500	USA			GEN DEL	WASHINGTON D C	20013	15
MALHEUR	16S46E02700	USA			GEN DEL	WASHINGTON D C	20013	15
MALHEUR	16S46E02800	MC BRIDE LEROY			447 RIDGE WAY	ONTARIO OR	97914	15
MALHEUR	17S42E00100	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	17S42E00200	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	17S43E00100	SCOTT LIVESTOCK CO			4876 N RD H	VALE OR	97918	17
MALHEUR	17S43E00400	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	17S43E00401	MC ELROY RANCHES INC			3760 STAGE RD	VALE OR	97918	17
MALHEUR	17S43E00500	MC ELROY RANCHES INC			3760 STAGE RD	VALE OR	97918	17
MALHEUR	17S43E00501	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	17S43E00700	DUSTY TRAILS RANCH LLC			2436 11TH AVE E	VALE OR	97918	17
MALHEUR	17S43E00800	DUSTY TRAILS RANCH LLC			2436 11TH AVE E	VALE OR	97918	17
MALHEUR	17S43E00900	MC ELROY RANCHES INC			3760 STAGE RD	VALE OR	97918	17
MALHEUR	17S43E00901	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	17S43E01000	FOSTER COTTONWOOD CREEK RANCH		C/O DONALD E WARNER	14948 MINDI ST	CALDWELL ID	83607	17
MALHEUR	17S43E01400	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	17S43E04000	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	17S44E06700	PAYNE MICHAEL L			2453 10TH AVE W	VALE OR	97918	17
MALHEUR	17S44E06800	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	17S44E06900	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR						VALE OR	97918	17
	17S44E07000	LASTIRI FRANCISCO & MARIA			830 SIERRA ST			
MALHEUR	17S44E07000 17S44E07100	MC CONNELL R WAYNE & DARLENE			PO BOX 7	VALE OR	97918	17
MALHEUR	17S44E07000 17S44E07100 17S44E07200	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE			PO BOX 7 PO BOX 7	VALE OR VALE OR	97918 97918	17
MALHEUR MALHEUR	17S44E07000 17S44E07100 17S44E07200 17S44E07500	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE ROBERTSON ASHLEY N ETVIR			PO BOX 7 PO BOX 7 2001 5TH AVE W	VALE OR VALE OR VALE OR	97918 97918 97918	17 17
MALHEUR MALHEUR MALHEUR	17S44E07000 17S44E07100 17S44E07200 17S44E07500 17S44E07600	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE ROBERTSON ASHLEY N ETVIR LAMB SCOTT E & KATHERINE L			PO BOX 7 PO BOX 7 2001 5TH AVE W 4435 S RD F	VALE OR VALE OR VALE OR VALE OR	97918 97918 97918 97918	17 17 17
MALHEUR MALHEUR MALHEUR MALHEUR	17S44E07000 17S44E07100 17S44E07200 17S44E07500 17S44E07600 17S44E08400	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE ROBERTSON ASHLEY N ETVIR LAMB SCOTT E & KATHERINE L WALTON TRACY & SHERRI			PO BOX 7 PO BOX 7 2001 5TH AVE W 4435 S RD F 3525 MESA AVE	VALE OR VALE OR VALE OR VALE OR EMMETT ID	97918 97918 97918 97918 83617	17 17 17 17
MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR	17S44E07000 17S44E07100 17S44E07200 17S44E07500 17S44E07600 17S44E08400 17S44E08600	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE ROBERTSON ASHLEY N ETVIR LAMB SCOTT E & KATHERINE L WALTON TRACY & SHERRI ANTHONY EDWARD F & NANCY A			PO BOX 7 PO BOX 7 2001 5TH AVE W 4435 S RD F 3525 MESA AVE 939 CLARK ST S	VALE OR VALE OR VALE OR VALE OR EMMETT ID VALE OR	97918 97918 97918 97918 97918 83617 97918	17 17 17 17 17
MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR	17S44E07000 17S44E07100 17S44E07200 17S44E07500 17S44E07600 17S44E08400 17S44E08600 17S44E08700	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE ROBERTSON ASHLEY N ETVIR LAMB SCOTT E & KATHERINE L WALTON TRACY & SHERRI ANTHONY EDWARD F & NANCY A ANTHONY EDWARD F & NANCY A			PO BOX 7 PO BOX 7 2001 5TH AVE W 4435 S RD F 3525 MESA AVE 939 CLARK ST S 939 CLARK ST S	VALE OR VALE OR VALE OR VALE OR VALE OR EMMETT ID VALE OR VALE OR	97918 97918 97918 97918 97918 83617 97918 97918	17 17 17 17 17 17
MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR	17S44E07000 17S44E07100 17S44E07200 17S44E07500 17S44E07500 17S44E08400 17S44E08600 17S44E08800	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE ROBERTSON ASHLEY N ETVIR LAMB SCOTT E & KATHERINE L WALTON TRACY & SHERRI ANTHONY EDWARD F & NANCY A ANTHONY EDWARD F & NANCY A MURREY FRANCES L			PO BOX 7 PO BOX 7 2001 5TH AVE W 4435 S RD F 3525 MESA AVE 939 CLARK ST S 939 CLARK ST S 2110 6TH AVE W	VALE OR VALE OR VALE OR VALE OR VALE OR EMMETT ID VALE OR VALE OR VALE OR	97918 97918 97918 97918 83617 97918 97918	17 17 17 17 17 17 17
MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR	17S44E07000 17S44E07100 17S44E07200 17S44E07500 17S44E07600 17S44E08600 17S44E08600 17S44E08700 17S44E08800 17S44E12700	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE ROBERTSON ASHLEY N ETVIR LAMB SCOTT E & KATHERINE L WALTON TRACY & SHERRI ANTHONY EDWARD F & NANCY A ANTHONY EDWARD F & NANCY A MURREY FRANCES L HESTER KURT ETAL			PO BOX 7 PO BOX 7 2001 5TH AVE W 4435 S RO F 3525 MESA AVE 939 CLARK ST S 939 CLARK ST S 2110 6TH AVE W 4391 S RD E	VALE OR VALE OR VALE OR VALE OR EMMETT ID VALE OR VALE OR VALE OR VALE OR VALE OR	97918 97918 97918 97918 83617 97918 97918 97918	17 17 17 17 17 17
MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR MALHEUR	17S44E07000 17S44E07100 17S44E07200 17S44E07500 17S44E07600 17S44E08400 17S44E08600 17S44E086700 17S44E08800 17S44E12700 17S44E12800	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE ROBERTSON ASHLEY N ETVIR LAMB SCOTT E & KATHERINE L WALTON TRACY & SHERRI ANTHONY EDWARD F & NANCY A MURREY FRANCES L HESTER KURT ETAL HESTER KURT ETAL			PO BOX 7 PO BOX 7 2001 5TH AVE W 4435 S RD F 3525 MESA AVE 939 CLARK ST S 939 CLARK ST S 2110 6TH AVE W	VALE OR VALE OR VALE OR VALE OR VALE OR EMMETT ID VALE OR VALE OR VALE OR	97918 97918 97918 97918 83617 97918 97918	17 17 17 17 17 17 17
MALHEUR	17544E07000 17544E07100 17544E07200 17544E07500 17544E07500 17544E08400 17544E08400 17544E08700 17544E12700 17544E12800 17544E12800 17544E12900	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE ROBERTSON ASHLEY N ETVIR LAMB SCOTT E & KATHERINE L WALTON TRACY & SHERRI ANTHONY EDWARD F & NANCY A ANTHONY EDWARD F & NANCY A MURREY FRANCES L HESTER KURT ETAL HESTER KURT ETAL HESTER KURT ETAL			PO BOX 7 PO BOX 7 2001 5TH AVE W 4435 S RD F 3625 MESA AVE 939 CLARK ST S 939 CLARK ST S 2110 6TH AVE W 4391 S RD E 4391 S RD E 4391 S RD E	VALE OR	97918 97918 97918 97918 83617 97918 97918 97918 97918	17 17 17 17 17 17 17 17 17
MALHEUR	17S44E07000 17S44E07100 17S44E07200 17S44E07500 17S44E07600 17S44E08400 17S44E08600 17S44E08700 17S44E08800 17S44E12700 17S44E12800 17S44E12800 17S44E13000	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE ROBERTSON ASHLEY N ETVIR LAMB SCOTT E & KATHERINE L WALTON TRACY & SHERRI ANTHONY EDWARD F & NANCY A ANTHONY EDWARD F & NANCY A MURREY FRANCES L HESTER KURT ETAL HESTER KURT ETAL HESTER KURT ETAL BATES RYAN E & THERESA A			PO BOX 7 PO BOX 7 PO BOX 7 2001 5TH AVE W 4435 S RO F 3525 MESA AVE 939 CLARK ST S 939 CLARK ST S 2110 6TH AVE W 4391 S RO E 4391 S RO E 4391 S RO E 2133 6TH AVE W	VALE OR VALE OR VALE OR VALE OR EMMETT ID VALE OR	97918 97918 97918 97918 83617 97918 97918 97918 97918 97918 97918 97918	17 17 17 17 17 17 17 17 17 17
MALHEUR	17544E07000 17544E07100 17544E07200 17544E07500 17544E07500 17544E08400 17544E08400 17544E08700 17544E12700 17544E12800 17544E12800 17544E12900	MC CONNELL R WAYNE & DARLENE MC CONNELL ROBERT W & DARLENE ROBERTSON ASHLEY N ETVIR LAMB SCOTT E & KATHERINE L WALTON TRACY & SHERRI ANTHONY EDWARD F & NANCY A ANTHONY EDWARD F & NANCY A MURREY FRANCES L HESTER KURT ETAL HESTER KURT ETAL HESTER KURT ETAL			PO BOX 7 PO BOX 7 2001 5TH AVE W 4435 S RD F 3625 MESA AVE 939 CLARK ST S 939 CLARK ST S 2110 6TH AVE W 4391 S RD E 4391 S RD E 4391 S RD E	VALE OR	97918 97918 97918 97918 83617 97918 97918 97918 97918	17 17 17 17 17 17 17 17 17

County	MapTaxlot	Owner	Owner2	Owner3	Address	City State	Zip	Map(s)
MALHEUR	17S44E13400	ANTHONY EDWARD F & NANCY A			939 CLARK ST S	VALE OR	97918	17
MALHEUR	17S44E13500	ANTHONY EDWARD F & NANCY A			939 CLARK ST S	VALE OR	97918	17
MALHEUR	17S44E13600	ANTHONY EDWARD F & NANCY A			939 CLARK ST S	VALE OR	97918	17
MALHEUR	17S44E13900	ROMANS GREGORY			1923 6TH AVE E	VALE OR	97918	17
MALHEUR	17S44E14000	ROMANS GREGORY			1923 6TH AVE E	VALE OR	97918	17
MALHEUR	17S44E14300	ANTHONY ANGUS LIMITED PTNRSHIP			939 CLARK ST S	VALE OR	97918	17
MALHEUR	17S44E14400	ANTHONY ANGUS LIMITED PTNRSHIP			939 CLARK ST S	VALE OR	97918	17
MALHEUR	17S44E14500	ANTHONY ANGUS LIMITED PTNRSHIP			939 CLARK ST S	VALE OR	97918	17
MALHEUR	17S44E14600	ANTHONY ANGUS LIMITED PTNRSHIP			939 CLARK ST S	VALE OR	97918	17
MALHEUR	17S44E14700	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	17S44E14800	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	17S44E15100	WHITE ROCK LLC			2085 N WILMINGTON DR	BOISE ID	83704	17
MALHEUR	17S44E2200400	PHILPOTT JOSEPH D			3501 AIRPORT RD	VALE OR	97918	17
MALHEUR	17S44E2200500	SCOTT WALTER B REV TRUST 1/2			4876 N RD H	VALE OR	97918	17
MALHEUR MALHEUR	17S44E2200600 17S44E2200700	BAIR JEFFREY R & MARTI JO CHILD DALLIN E & MICHELLE D			2048 6TH AVE W PO BOX 262	VALE OR VALE OR	97918 97918	17 17
MALHEUR	17S44E2200700 17S44E2200800	BAIR JEFFREY R & MARTI JO			2048 6TH AVE W	VALE OR VALE OR	97918	17
MALHEUR	17S44E2200900	BAIR MARTI J			2048 6TH AVE W	VALE OR VALE OR	97918	17
MALHEUR	17S44E2700100	REED PATRICIA REV LIV TRUST			4393 S RD D	VALE OR	97918	17
MALHEUR	17S44E2700100	REED PATRICIA REV LIV TRUST			4393 S RD D	VALE OR	97918	17
MALHEUR	17S44E2700200	MAAG REX & PATTI FAMILY TRUST			1547 VALE VIEW RD	VALE OR	97918	17
MALHEUR	17S44E2700201	CHILD CHANCEY A			2081 6TH AVE W	VALE OR	97918	17
MALHEUR	17S44E2700401	MAAG REX & PATTI FAMILY TRUST			1547 VALE VIEW RD	VALE OR	97918	17
MALHEUR	17S44E2700600	REED PATRICIA REV LIV TRUST			4393 S RD D	VALE OR	97918	17
MALHEUR	17S44E2700600	REED PATRICIA REV LIV TRUST			4393 S RD D	VALE OR	97918	17
MALHEUR	17S45E00200	BETTIS HARRY L			PO BOX 7	EMMETT ID	83617	16
MALHEUR	17S45E00300	USA			GEN DEL	WASHINGTON D C	20013	16
MALHEUR	17S45E00400	USA			GEN DEL	WASHINGTON D C	20013	16
MALHEUR	17S45E00400	USA			GEN DEL	WASHINGTON D C	20013	16
MALHEUR	18S43E00100	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	18S43E00600	FOSTER COTTONWOOD CREEK RANCH		C/O DONALD E WARNER	14948 MINDI ST	CALDWELL ID	83607	17
MALHEUR	18S43E01100	USA			GEN DEL	WASHINGTON D C	20013	18
MALHEUR	18S43E01300	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR MALHEUR	18S43E01390 18S43E01400	FAITH LAND CO LLC FAITH LAND CO LLC		C/O RUSSELL DECKER C/O RUSSELL DECKER	22391 RAMS HORN WAY 22391 RAMS HORN WAY	CALDWELL ID CALDWELL ID	83607 83607	18
MALHEUR	18S43E01400 18S43E01400			C/O RUSSELL DECKER C/O RUSSELL DECKER	22391 RAMS HORN WAY 22391 RAMS HORN WAY	CALDWELL ID CALDWELL ID	83607	18
MALHEUR MAI HEUR	18S43E01500	FAITH LAND CO LLC		C/O RUSSELL DECKER	GEN DEL	WASHINGTON D C	20013	18 18
MALHEUR	18S43E01600	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR	18S43E01600	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR	18S43E01600	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR	18S43E01602	TROTTER THOMAS E & NADINA F		O/O NOODELE BEOKEN	2705 VOGUE RD	VALE OR	97918	18
MALHEUR	18S43E01603	HICKS DELMAR & FRANCES			2733 VOGUE RD	VALE OR	97918	18
MALHEUR	18S43E01604	HICKS DELMAR & FRANCES			2733 VOGUE RD	VALE OR	97918	18
MALHEUR	18S43E01604	HICKS DELMAR & FRANCES			2733 VOGUE RD	VALE OR	97918	18
MALHEUR	18S43E01605	TROTTER OLIVER A & PATRICIA A			2707 VOGUE RD	VALE OR	97918	18
MALHEUR	18S43E01700	WARMSPRINGS IRRIGATION DIST			GEN DEL	VALE OR	97918	18
MALHEUR	18S43E01700	WARMSPRINGS IRRIGATION DIST			GEN DEL	VALE OR	97918	18
MALHEUR	18S43E01800	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR	18S43E01890	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR	18S43E01900	SULLIVAN ALTON E & DIXIE G			PO BOX 2118	LEBANON OR	97355	18
MALHEUR	18S43E02000	WYOMING-COLORADO RAILROAD			1027 S MAIN ST STE 403	JOPLIN MO	64801	18
MALHEUR	18S43E02100	ANTHONY EDWARD F & NANCY A			939 CLARK ST S	VALE OR	97918	17
MALHEUR	18S43E02400	USA		0/0.140.5/.501/.5.0.15	GEN DEL	WASHINGTON D C	20013	17
MALHEUR	18S43E02500	MC ELROY RANCHES INC MC ELROY RANCHES INC		C/O MC ELROY T C JR	3760 STAGE RD	VALE OR	97918 97918	17 17
MALHEUR MALHEUR	18S43E02600 18S43E06300	HOPP FAMILY REVOCABLE TRUST		C/O MC ELROY T C JR CARL W JR & VICKIE HOPP	3760 STAGE RD 63421 SADDLEBACK DR	VALE OR BEND OR	97703	18
MALHEUR	18S43E06400	HOPP FAMILY REVOCABLE TRUST		CARL W JR & VICKIE HOPP	63421 SADDLEBACK DR 63421 SADDLEBACK DR	BEND OR	97703	18
MALHEUR	18S43E06500	PALMER JAMES G & BETH E		S. I. E. I. BIT & VIOINE FIOT	2693 VOGUE RD	VALE OR	97918	18
MALHEUR	18S43E06500	PALMER JAMES G & BETH E			2693 VOGUE RD	VALE OR VALE OR	97918	18
MALHEUR	18S44E02600	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	18S44E02700	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	18S44E03000	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	18S44E03100	USA			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	18S44E03200	ANTHONY ANGUS LIMITED PTNRSHIP			939 CLARK ST S	VALE OR	97918	17
MALHEUR	18S44E03500	ANTHONY EDWARD F & NANCY A			939 CLARK ST S	VALE OR	97918	17
MALHEUR	19S43E00100	USA			GEN DEL	WASHINGTON D C	20013	18
MALHEUR	19S43E00200	WEGNER DANIEL P TRUST ETAL		TERRY & PATTI WEGNER	2245 BISHOP RD	VALE OR	97918	18
MALHEUR	19S43E01700	SULLIVAN ALTON E & DIXIE G			PO BOX 2118	LEBANON OR	97355	18
MALHEUR	19S43E02000	SULLIVAN ALTON E & DIXIE G			PO BOX 2118	LEBANON OR	97355	18
MALHEUR	19S43E02100	HOLLOWAY JERALD M & TAMMY R			1946 SAND HOLLOW RD	VALE OR	97918	18
MALHEUR	19S43E02200	USA USA			GEN DEL	WASHINGTON D.C.	20013	18
MALHEUR MALHEUR	19S43E02200 19S43E02300	FAITH LAND CO LLC		C/O RUSSELL DECKER	GEN DEL 22391 RAMS HORN WAY	WASHINGTON D C CALDWELL ID	20013 83607	18 18
MALHEUR	19S43E02300 19S43E02400	FAITH LAND COLLC FAITH LAND COLLC		C/O RUSSELL DECKER C/O RUSSELL DECKER	22391 RAMS HORN WAY 22391 RAMS HORN WAY	CALDWELL ID CALDWELL ID	83607 83607	18 18
MALHEUR	19S43E02400 19S43E02500	FAITH LAND COLLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY 22391 RAMS HORN WAY	CALDWELL ID CALDWELL ID	83607	18
MALHEUR	19S43E02600	HINTON LARRY D		S.S. NOODLLE DEONLIN	PO BOX L	VALE OR	97918	18
MALHEUR	19S43E02700	PESZNECKER BROTHERS INC			PO BOX 275	CLACKAMAS OR	97015	18
MALHEUR	19S43E02800	WYOMING COLORADO RAILROAD			1027 S MAIN ST STE 403	JOPLIN MO	64801	18
MALHEUR	19S43E02900	HOLLOWAY JERALD M & TAMMY R			1946 SAND HOLLOW RD	VALE OR	97918	18
MALHEUR	19S43E03000	HOLLOWAY JERALD M & TAMMY R			1946 SAND HOLLOW RD	VALE OR	97918	18
MALHEUR	19S43E04900	USA			GEN DEL	WASHINGTON DC	20013	18

County	MapTaxlot	Owner Owner2	Owner3	Address	City State	Zip	Map(s)
MALHEUR	19S43E05000	HOLLOWAY JERALD M & TAMMY R		1946 SAND HOLLOW RD	VALE OR	97918	18
MALHEUR	19S43E05100	USA		GEN DEL	WASHINGTON D C	20013	18
MALHEUR	19S43E06500	USA		GEN DEL	WASHINGTON D C	20013	18
MALHEUR MALHEUR	19S44E00100 19S44E00200	WEGNER DANIEL P TRUST ETAL	TERRY & PATTI WEGNER	2245 BISHOP RD GEN DEL	VALE OR WASHINGTON D C	97918 20013	18, 19
MALHEUR	19S44E00200 19S44E00400	USA BLAKE JONATHAN M & LACY A		3251 RUSSELL RD	VALE OR	97918	18 19
MALHEUR	19S44E00400	BLAKE JONATHAN M & LACY A		3251 RUSSELL RD	VALE OR	97918	19
MALHEUR	19S44E00600	KEZNO FUKIAGE BYPASS TRUST 47%	C/O MARIKO LOCKE	9883 SE WESTVIEW CT	HAPPY VALLEY OR	97086	19
MALHEUR	19S44E00900	USA	C/O III II III IO ECONE	GEN DEL	WASHINGTON D C	20013	18, 19
MALHEUR	19S44E00901	WEGNER DANIEL P TRUST ETAL	TERRY & PATTI WEGNER	2245 BISHOP RD	VALE OR	97918	19
MALHEUR	19S44E01005	WEGNER DANIEL P TRUST ETAL	TERRY & PATTI WEGNER	2245 BISHOP RD	VALE OR	97918	19
MALHEUR	19S44E01100	STANDAGE ENTERPRISES LLC		1825 U S HWY 20	VALE OR	97918	19
MALHEUR	19S44E01200	USA		GEN DEL	WASHINGTON D C	20013	19
MALHEUR	19S44E06200	KEZNO FUKIAGE BYPASS TRUST 47%	C/O MARIKO LOCKE	9883 SE WESTVIEW CT	HAPPY VALLEY OR	97086	19
MALHEUR	19S44E06200	KEZNO FUKIAGE BYPASS TRUST 47%	C/O MARIKO LOCKE	9883 SE WESTVIEW CT	HAPPY VALLEY OR	97086	19
MALHEUR	19S44E1300600	HOLLOWAY JERALD M & TAMMY R		1946 SAND HOLLOW RD	VALE OR	97918	19
MALHEUR MALHEUR	19S44E1400500 19S44E1400900	STANDAGE ENTERPRISES LLC FULLETON DANIEL & MARY LYNN		1825 U S 20 HWY 3550 FULLETON RD	VALE OR VALE OR	97918 97918	19 19
MALHEUR	19S44E1400900 19S45E00100	USA		GEN DEL	WASHINGTON D C	20013	19
MALHEUR	19S45E01500	WEGNER DANIEL P TRUST ETAL	TERRY & PATTI WEGNER	2245 BISHOP RD	VALE OR	97918	19
MALHEUR	20S43E00100	USA	TENNI WI ATTI WEGNER	GEN DEL	WASHINGTON D C	20013	18
MALHEUR	20S44E00100	WEGNER DANIEL P TRUST ETAL	TERRY & PATTI WEGNER	2245 BISHOP RD	VALE OR	97918	19
MALHEUR	20S44E00300	USA		GEN DEL	WASHINGTON D C	20013	18, 19
MALHEUR	20S44E00300	USA		GEN DEL	WASHINGTON D C	20013	18, 19, 20
MALHEUR	20S44E00300	USA		GEN DEL	WASHINGTON D C	20013	19, 20
MALHEUR	20S44E00301	WEGNER DANIEL P TRUST ETAL	TERRY & PATTI WEGNER	2245 BISHOP RD	VALE OR	97918	19
MALHEUR	20S44E00700	USA BLM VALE DISTRICT		100 OREGON ST	VALE OR	97918	20
MALHEUR	20S45E00100	USA		GEN DEL	WASHINGTON D C	20013	19
MALHEUR	20S45E00100	USA		GEN DEL	WASHINGTON D C	20013	19
MALHEUR MALHEUR	20S45E00100 20S45E00101	USA		GEN DEL	WASHINGTON D C NYSSA OR	20013 97913	19, 20 19
		SAURET CURTIS TRUST	TERRY A RATTIME CALER	1435 COW HOLLOW RD			
MALHEUR MALHEUR	20S45E00200 20S45E00300	WEGNER DANIEL P TRUST ETAL SAURET CURTIS TRUST	TERRY & PATTI WEGNER	2245 BISHOP RD 1435 COW HOLLOW RD	VALE OR NYSSA OR	97918 97913	19 19, 20
MALHEUR	20S45E00500 20S45E00500	USA BLM VALE DISTRICT		100 OREGON ST	VALE OR	97918	19, 20
MALHEUR	20S45E00600	USA		GEN DEL	WASHINGTON D C	20013	19
MALHEUR	20S45E00800	USA		GEN DEL	WASHINGTON D C	20013	19, 20
MALHEUR	20S45E02000	USA		GEN DEL	WASHINGTON D C	20013	20
MALHEUR	20S45E02000	USA		GEN DEL	WASHINGTON D C	20013	20
MALHEUR	20S45E02100	DIMOCK JORDAN R & TAMARA L		2635 MITCHELL BUTTE RD	NYSSA OR	97913	20
MALHEUR	20S45E02400	GORDON JOHN NELS 1/3 ETAL 2/3	C/O JANA BARLOW ETAL	2675 MITCHELL BUTTE RD	NYSSA OR	97913	20
MALHEUR	20S45E02500	WILLIAMS DOROTHY ETAL		1349 KLAMATH AVE	NYSSA OR	97913	20
MALHEUR	20S45E02600	AYARZA JUAN M		2580 SCHWEIZER RD	NYSSA OR	97913	20
MALHEUR	20S45E02800	HATFIELD KENNETH A REV TRUST		PO BOX 691717	STOCKTON CA	95269	20
MALHEUR	20S45E02800	HATFIELD KENNETH A REV TRUST		PO BOX 691717	STOCKTON CA	95269	20
MALHEUR	20S45E2600500	WELLING JOHN ETAL		2545 MITCHELL BUTTE RD	NYSSA OR	97913	20
MALHEUR MALHEUR	20S45E2600600 20S45E35A00200	GLENN STEVEN C & KATHLEEN GLENN STEVEN C & KATHLEEN A		1336 OWYHEE AVE 1336 OWYHEE AVE	NYSSA OR NYSSA OR	97913 97913	20 20
MALHEUR	20S45E35A00200 20S45E35A00300	HATFIELD KENNETH A REV TRUST		PO BOX 691717	STOCKTON CA	97913	20
MALHEUR	21S44E00100	USA		GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S45E00100	USA		GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S45E00100	USA		GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S45E00100	USA		GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S45E00100	USA		GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S45E00100	USA		GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S45E00200	DORN ENTERPRISES INC		453 PALOS VERDES DR W	PALOS VERDES ESTCA	90274	20
MALHEUR	21S45E00700	T V PROPERTIES LLC ETAL	C/O DEBBIE WILSON	29104 LANCE LNE	PARMA ID	83660	20
MALHEUR	21S45E00800	HATFIELD KENNETH A REV TRUST		PO BOX 691717	STOCKTON CA	95269	20
MALHEUR MALHEUR	21S45E01000 21S45E01000	USA USA		GEN DEL GEN DEL	WASHINGTON D C WASHINGTON D C	20013	20 20
MALHEUR MALHEUR	21S45E01000 21S45E01000	USA USA		GEN DEL GEN DEL	WASHINGTON D C WASHINGTON D C	20013 20013	20 20
MALHEUR	21S45E01000 21S46E03500	USA		GEN DEL GEN DEL	WASHINGTON D C WASHINGTON D C	20013	20
MALHEUR	21S46E03600	DORN ENTERPRISES INC		453 PALOS VERDES DR W	PALOS VERDES ESTCA	90274	20
MALHEUR	21S46E03800	DORN ENTERPRISES INC		453 PALOS VERDES DR W	PALOS VERDES ESTCA	90274	20
MALHEUR	21S46E04000	USA		GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S46E04100	DORN ENTERPRISES INC		453 PALOS VERDES DR W	PALOS VERDES ESTCA	90274	20
MALHEUR	21S46E04200	DORN ENTERPRISES INC		453 PALOS VERDES DR W	PALOS VERDES ESTCA	90274	20
MALHEUR	21S46E04500	USA		GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S46E04500	USA		GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S46E05000	TEAGUE MARIE L		1055 MEDIOLA RD	NYSSA OR	97913	20
MALHEUR	21S46E05300	TEAGUE MINERAL PRODUCTS		1925 HWY 201 S	ADRIAN OR	97901	20
MALHEUR	21S46E05400	TEAGUE MARIE L		1055 MENDIOLA RD	NYSSA OR	97913	20
MALHEUR	21S46E05500	BAUCUM BILLY H & MARGIE R		P O BOX 106	ADRIAN OR	97901	20
MALHEUR	21S46E05600	PETERSON JEREMY M		1520 N LINDER RD	MERIDIAN ID	83642	20
MALHEUR MALHEUR	21S46E05601	SPIERS KEITH G & MARSHA A		1770 201 HWY	ADRIAN OR	97901 97901	20
	21S46E05800 21S46E06000	CAMERON JOHN EMERY ETAL SPIERS DARREN K & JENNIFER		1835 201 HWY 1853 HWY 201	ADRIAN OR ADRIAN OR	97901	20 20
MALHELID	21040L00000			35 N HASTINGS DR	NAMPA ID	83687	20
MALHEUR MALHEUR	21S46E06100						
MALHEUR MALHEUR MALHEUR	21S46E06100 21S46E06200	HESS LINDA M CAMERON JOHN EMERY ETAL		1835 HWY 201		97901	20
MALHEUR	21S46E06100 21S46E06200 21S46E3400800	HESS LINDA M CAMERON JOHN EMERY ETAL BEAVERS RICK LEE		1835 HWY 201	ADRIAN OR ADRIAN OR		20
MALHEUR MALHEUR	21S46E06200	CAMERON JOHN EMERY ETAL			ADRIAN OR	97901	

County	MapTaxlot	Owner (	Owner2	Owner3	Address	City State	Zip	Map(s)
MALHEUR	23S46E00100	USA	JWHEI Z	Owners	GEN DEL	WASHINGTON D C	20013	21
MALHEUR	23S46E00100	USA			GEN DEL	WASHINGTON D C	20013	21
MALHEUR	23S46E00200	USA			GEN DEL	WASHINGTON D C	20013	21
MALHEUR	23S46E00200	USA			GEN DEL	WASHINGTON D.C.	20013	21
MALHEUR	23S46E00300	BAR 71 LLC			412 SUCCOR CREEK RD	JORDAN VALLEY OR	97910	21
MALHEUR	23S46E00400	OREGON STATE OF PARKS & REC			725 SUMMER ST NE STE#C	SALEM OR	97301	21
MALHEUR	23S46E00500	USA			GEN DEL	WASHINGTON D C	20013	21
MALHEUR	23S46E00600	S & B LIVESTOCK LLC			PO BOX 309	EAGLE ID	83616	21
MALHEUR	23S46E00700	STIMMEL MARK D & MAXINE M			3726 SAGE RD	HOMEDALE ID	83628	21
MALHEUR	23S46E00800	USA			GEN DEL	WASHINGTON D C	20013	21
MALHEUR	23S46E01000	S & B LIVESTOCK LLC			PO BOX 309	EAGLE ID	83616	21
MALHEUR	23S46E0100100	SHENK ADRIAN FARM LLC		C/O DONNA MARIE SHENK	625 LONESOME RD	ADRIAN OR	97901	21
MALHEUR	23S46E0100400	YOST RONNEY G & DE LORIS C			653 LONESOME RD	ADRIAN OR	97901	21
MALHEUR	23S46E0100500	SHENK DONNA M FAMILY TRUST			625 LONESOME RD	ADRIAN OR	97901	21
MALHEUR	23S46E01100	S & B LIVESTOCK LLC			PO BOX 309	EAGLE ID	83616	21
MALHEUR	23S46E01200	S & B LIVESTOCK LLC			PO BOX 309	EAGLE ID	83616	21
MALHEUR	23S46E01300	MENDENHALL TERRY M			65 DOWELL DR	FORDLAND MO	65652	21
MALHEUR	23S46E01400	REUCK BRUCE & TERRY			1077 DESERT GLEN RD	ADRIAN OR	97901	21
MALHEUR	23S46E01401	BROWN DAVID W			4717 APPLE ST	BOISE ID	83716	21
MALHEUR	23S46E01500	ATKINS SHARON ANN TRUST			1067 STATELINE RD	ADRIAN OR	97901	21
MALHEUR	23S46E01600	BROWN DAVID W			4717 APPLE ST	BOISE ID	83716	21
MALHEUR	23S46E01700	BROWN DAVID W			4717 APPLE ST	BOISE ID	83716	21
MALHEUR	23S46E01800	DOWTY LEON J 1/2			760 LA GUARDIA LN	RENO NV	89511	21
MALHEUR	23S46E01900	WOOD FAMILY TRUST		C/O FLOYD WOOD TRUSTEE	PO BOX 1107	HOMEDALE ID	83628	21
MALHEUR	23S46E02000	BAR 71 LLC			412 SUCCOR CREEK RD	JORDAN VALLEY OR	97910	21
MALHEUR	23S46E0200100	SHENK ADRIAN FARM LLC		C/O DONNA MARIE SHENK	625 LONESOME RD	ADRIAN OR	97901	21
MALHEUR	23S46E0200200	SHENK ADRIAN FARM LLC		C/O DONNA MARIE SHENK	625 LONESOME RD	ADRIAN OR	97901	21
MALHEUR	23S46E0200300	S & B LIVESTOCK LLC			PO BOX 309	EAGLE ID	83616	21
MALHEUR	23S47E00300	ATKINS LEE M & SHARON A ETAL			1067 STATELINE RD	ADRIAN OR	97901	21
MALHEUR	23S47E00400	ATKINS SHARON ANN TRUST			1067 STATELINE RD	ADRIAN OR	97901	21
MALHEUR	23S47E00500	BROWN DAVID W			4717 APPLE ST	BOISE ID	83716	21
MALHEUR	23S47E00600	BROWN DAVID W			4717 APPLE ST	BOISE ID	83716	21
MALHEUR	23S47E00700	USA			GEN DEL	WASHINGTON D C	20013	21
MALHEUR	23S47E00700 23S47E00800	USA			GEN DEL	WASHINGTON D C	20013	21
				0/0 0 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
MALHEUR	23S47E0600100	SHENK ADRIAN FARM LLC		C/O DONNA MARIE SHENK	625 LONESOME RD	ADRIAN OR	97901	21
MALHEUR	23S47E0600201	SHOWALTER CHAD G & GINA E			6513 HOWARD RD	MARSING ID	83639	21
MALHEUR	23S47E0600202	BRUNING HAROLD & DEBBIE			1030 DESERT GLEN RD	ADRIAN OR	97901	21
MALHEUR	24S46E00100	USA			GEN DEL	WASHINGTON D C	20013	21
MALHEUR	24S46E00100	USA			GEN DEL	WASHINGTON D C	20013	21
MALHEUR	24S46E00200	OREGON STATE OF PARKS & REC			725 SUMMER ST NE STE#C	SALEM OR	97301	21
MALHEUR	24S47E00100	USA			GEN DEL	WASHINGTON D C	20013	21
MORROW	01N25E000000100	KILKENNY LAND COMPANY LLC		HALE KELLY	1124 SW MYRTLE DR	PORTLAND OR	97201	2
MORROW	01N25E000001600	NORTH LEX POWER AND LAND LLC			73114 STRAWBERRY LN	LEXINGTON OR	97839	2
MORROW	01N26E000000400	WILLIAM J DOHERTY RANCH LLC			70644 DOHERTY RD	LEXINGTON OR	97839	2
MORROW	01N26E000000600	GRIEB FARMS INC			72540 ALPINE LN	LEXINGTON OR	97839	2
MORROW	01N26E000000701	NORTH LEX POWER AND LAND LLC		RAUCH CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON OR	97839	2
MORROW	01N26E000001100	NORTH LEX POWER AND LAND LLC			73114 STRAWBERRY LN	LEXINGTON OR	97839	2
MORROW	01N26E000001101	RAUCH STANLEY M			72629 JUNIPER LN	LEXINGTON OR	97839	2
MORROW	01N26E000001101	NORTH LEX POWER AND LAND LLC			73114 STRAWBERRY LN	LEXINGTON OR	97839	2
MORROW	01N26E000001102	NORTH LEX POWER AND LAND LLC			73114 STRAWBERRY LN	LEXINGTON OR	97839	2
MORROW	01N26E000001300	WILLIAM J DOHERTY RANCH LLC			70644 DOHERTY RD	LEXINGTON OR	97839	2
MORROW	01N26E000001300	NORTH LEX POWER AND LAND LLC			73114 STRAWBERRY LN	LEXINGTON OR	97839	2
								2
MORROW	01N26E000001500	NORTH LEX POWER AND LAND LLC			73114 STRAWBERRY LN	LEXINGTON OR	97839	
MORROW	01N26E000002400	WILLIAM J DOHERTY RANCH LLC			70644 DOHERTY RD	LEXINGTON OR	97839	2
MORROW	01N26E000002700	NORTH LEX POWER AND LAND LLC			73114 STRAWBERRY LN	LEXINGTON OR	97839	2
MORROW	01N26E000002804	KARYL SMITH INC			8825 N ORCHARD PR RD	SPOKANE WA	99217	2
MORROW	01N26E000002805	HEIDEMAN LOREN A & DELLA K			22948 FAIRVIEW LN	IONE OR	97843	2
		TRUSTEES						
MORROW	01N26E000002900	LONEROCK LAND AND TIMBER LLC			26675 ICE HARBOR DR	BURBANK WA	99323	2
MORROW	01N26E000003100	LONEROCK LAND AND TIMBER LLC			26675 ICE HARBOR DR	BURBANK WA	99323	2
MORROW	01N26E000003200	NORTH LEX POWER AND LAND LLC			73114 STRAWBERRY LN	LEXINGTON OR	97839	2
MORROW	01N27E000000100	LUCIANI JOHN H			27633 BUTTERCREEK RD	ECHO OR	97826	3
MORROW	01N27E000000101	VANBUREN FAMILY PROPERTY TRUST			32922 KAHLOTUS HWY	PASCO WA	99301	3
MORROW	01N27E000000102	ASHBECK ROBERT R & ASHBECK			69361 LITTLE BUTTER CREEK RD	ECHO OR	97826	3
		JENNIFER						-
MORROW	01N27E000000103	VANBUREN FAMILY PROPERTY TRUST			32922 KAHLOTUS HWY	PASCO WA	99301	3
MORROW	01N27E000000103	VANBUREN FAMILY PROPERTY TRUST			32922 KAHLOTUS HWY	PASCO WA	99301	3
MORROW	01N27E000000104	LUCIANI JOHN H & LUCIANI KAREN S			27633 BUTTER CREEK RD	ECHO OR	97826	3
MORROW	01N27E000000107	ASHBECK MITCHELL C & TERRYL ANN			69359 LITTLE BUTTER CREEK RD	ECHO OR ECHO OR	97826	3
MORROW	01N27E000000108 01N27E000000200	BUTTERCREEK RANCHES LLC			PO BOX 487		97826	3
						PENDLETON OR		
MORROW	01N27E000000300	BUTTERCREEK RANCHES LLC			PO BOX 487	PENDLETON OR	97801	3
MORROW	01N27E000000700	MYERS JERRY & MYERS NANCY			68477 LITTLE BUTTER CREEK RD	HEPPNER OR	97836	3
MORROW	01N27E000001000	HAYS MITCHELL I TRUSTEE ETAL			77964 BIG BUTTER CREEK LN	ECHO OR	97826	3
MORROW	01N27E000001401	BUTTER CREEK COELHO LLC			78550 BIG BUTTER CREEK RD	ECHO OR	97826	3
MORROW	01N27E000001402	KNUTZ KEVIN L & KNUTZ TONYA L			78361 BIG BUTTER CREEK RD	ECHO OR	97826	3
MORROW	01N27E10A000100	BUTTERCREEK RANCHES LLC			PO BOX 487	PENDLETON OR	97801	3
MORROW	01N27E10A000200	BUTTERCREEK RANCHES LLC			PO BOX 487	PENDLETON OR	97801	3
MORROW	01N27E10A000300	ASHBECK MICHELE			69425 LITTLE BUTTER CREEK RD	ECHO OR	97826	3
MORROW	01N27E10A000400	ASHBECK MITCHELL C & TERRYL ANN			69359 LITTLE BUTTER CREEK RD	ECHO OR	97826	3
MORROW	01N28E000000400	LUCIANI JOHN H			27633 BUTTERCREEK RD	ECHO OR	97826	3
MORROW	01N28E000000401	VANBUREN FAMILY PROPERTY TRUST			32922 KAHLOTUS HWY	PASCO WA	99301	3
								-

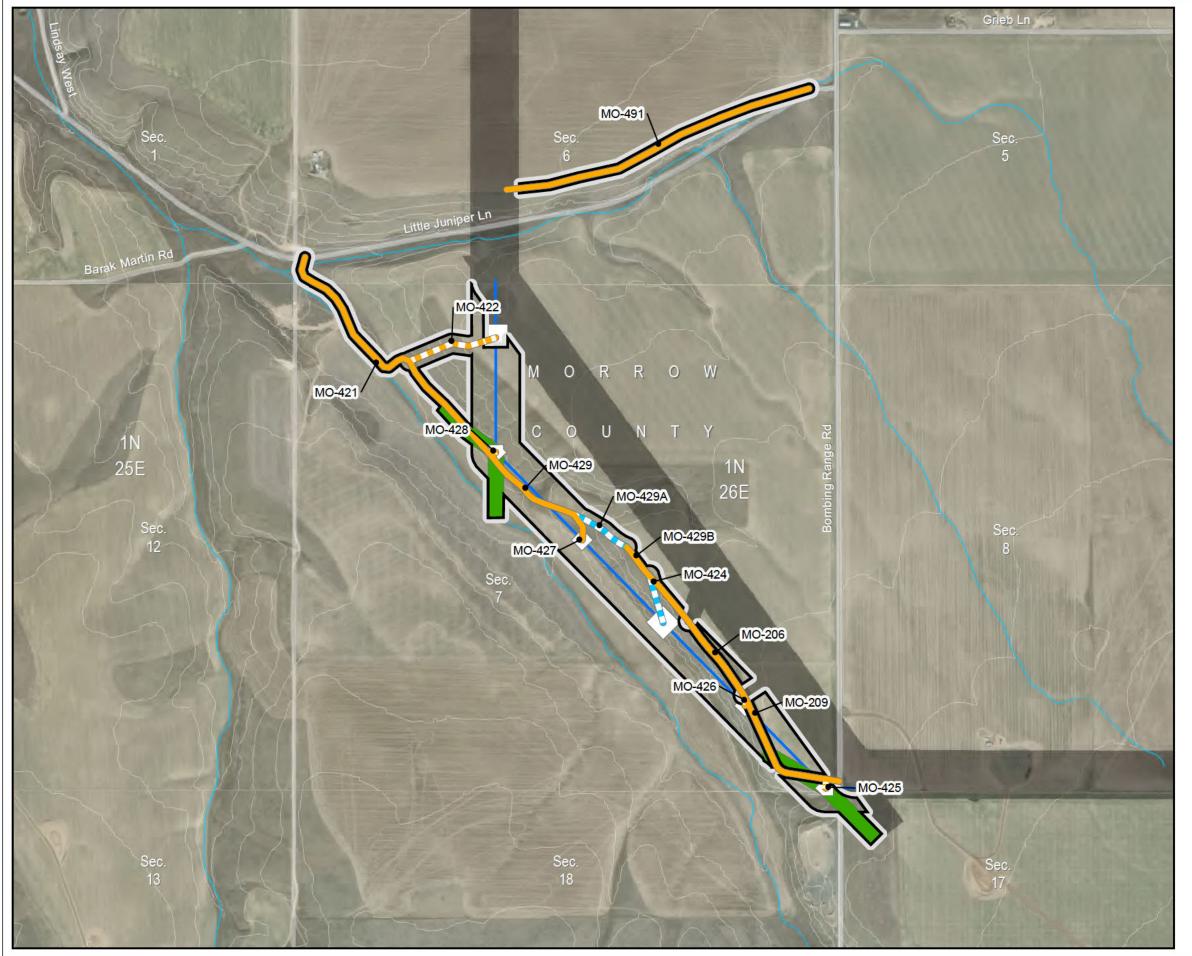
Carretin	ManTaulat	0	0	0	Audunn	City State	7:	Man(a)
County MORROW	MapTaxlot 01N28E000000500	Owner ARCUS LLC	Owner2	Owner3	Address ONE 100TH AVE NE STE, 102	City State BELLEVUE WA	Zip 98004	Map(s)
MORROW	02N24E000000107	THREEMILE CANYON FARMS LLC			75906 THREEMILE RD	BOARDMAN OR	97818	1, 2
MORROW	02N24E000000107	ELLA RANCH LLC		DOHERTY RICHARD	3588 NW LEHMAN PL	BEAVERTON OR	97006	2
MORROW	02N25E000000200	USA (BOMBING RANGE)		DOTIERTT RICHARD	3300 INVV ELI IIVIAIN I E	BLAVEITION OIL	97000	1, 2
MORROW	02N25E000000200	KILKENNY LAND COMPANY LLC		HALE KELLY	1124 SW MYRTLE DR	PORTLAND OR	97201	2
MORROW	02N25E000000400	KILKENNY LAND COMPANY LLC		HALE KELLY	1124 SW MYRTLE DR	PORTLAND OR	97201	2
MORROW	02N25E0000000000	KLINGER KENNETH MICHAEL		HALE RELLT	68280 IMMIGRANT LN	IONE OR	97843	2
MORROW	02N25E000000000	DOHERTY MATTHEW P			79972 AGNEW RD	HERMISTON OR	97838	2
MORROW	02N25E000000700	ELLA RANCH LLC		DOHERTY RICHARD	3588 NW LEHMAN PL	BEAVERTON OR	97006	2
MORROW	02N26E000000701	BAKER PRODUCE SOUTH INC		DOREKTT KICHARD	PO BOX 4063	PASCO WA	99302	1
MORROW	02N26E000000400	BAKER PRODUCE SOUTH INC			PO BOX 4063 PO BOX 4063	PASCO WA	99302	
MORROW	02N26E000000501	BAKER PRODUCE SOUTH INC			PO BOX 4063	PASCO WA	99302	1, 2
MORROW	02N26E0000000001	BAKER PRODUCE SOUTH INC			PO BOX 4063 PO BOX 4063	PASCO WA	99302	2
MORROW MORROW	02N26E000000600	BAKER PRODUCE SOUTH INC			PO BOX 4063 PO BOX 4063	PASCO WA	99302	1, 2
MORROW MORROW	02N26E000000800 02N26E000000900	IVAR & LINA LLC BAKER PRODUCE SOUTH INC			958 W CODY AVE PO BOX 4063	HERMISTON OR	97838 99302	1, 2
						PASCO WA		1
MORROW	02N26E000001101	MATHENY PROPERTY LLC			74596 ALPINE LN 72540 ALPINE LN	LEXINGTON OR	97839	2
MORROW	02N26E000001200					LEXINGTON OR	97839	_
MORROW	02N26E000001201	GAS TRANSMISSION NORTHWEST LLC			700 LOUISIANA ST SUITE 1300	HOUSTON TX	77002	2
MORROW	02N26E000001500	GRIEB KEN & CARRI			72540 ALPINE LN	LEXINGTON OR	97839	2
MORROW	02N26E000001600	GRIEB KEN & CARRI			72540 ALPINE LN	LEXINGTON OR	97839	2
MORROW	02N26E000001700	GRIEB KEN & CARRI			72540 ALPINE LN	LEXINGTON OR	97839	2
MORROW	02N26E000001900	GRIEB KEN & CARRI			72540 ALPINE LN	LEXINGTON OR	97839	2
MORROW	02S29E000000100	JOE P DOHERTY SHEEP RANCH INC			PO BOX 588	OTHELLO WA	99344	4
MORROW	02S29E000001100	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
MORROW	02S29E000001300	CUNNINGHAM SHEEP & LAND CO	PENDLETON RANCHES INC 44.78%		PO BOX 1186	PENDLETON OR	97801	4
		55.22%						
MORROW	03N24E000000112	THREEMILE CANYON FARMS LLC			75906 THREEMILE RD	BOARDMAN OR	97818	1
MORROW	03N25E000000100	USA (BOMBING RANGE)						1
MORROW	03N26E000000511	BAKER PRODUCE SOUTH INC			PO BOX 4063	PASCO WA	99302	1
UMATILLA	1S30000001900	CUNNINGHAM SHEEP AND LAND	PENDLETON RANCHES INC		PO BOX 1186	PENDLETON OR	97801-0018	4
		COMPANY &						
UMATILLA	1S30000001900	CUNNINGHAM SHEEP AND LAND	PENDLETON RANCHES INC		PO BOX 1186	PENDLETON OR	97801-0018	4
		COMPANY &						
UMATILLA	1S32000006300	CLARKE VERA A (TRS) & TJL RANCH LLC	C/O MITTENTHAL JUDITH ANN		1420 NW GILMAN BLVD SUITE 2 #2655	ISSAQUAH WA	98027-5333	5
UMATILLA	1S32000006300	CLARKE VERA A (TRS) & TJL RANCH LLC	C/O MITTENTHAL JUDITH ANN		1420 NW GILMAN BLVD SUITE 2 #2655	ISSAQUAH WA	98027-5333	5
UMATILLA	1S32000006300	CLARKE VERA A (TRS) & TJL RANCH LLC	C/O MITTENTHAL JUDITH ANN		1420 NW GILMAN BLVD SUITE 2 #2655	ISSAQUAH WA	98027-5333	5
		, , , , , , , , , , , , , , , , , , , ,						
UMATILLA	1S32000006400	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	1S32000006600	CLARKE VERA A (TRS) & TJL RANCH LLC	C C/O MITTENTHAL JUDITH ANN		1420 NW GILMAN BLVD SUITE 2 #2655	ISSAQUAH WA	98027-5333	5
		, , , , , , , , , , , , , , , , , , , ,						
UMATILLA	1S33000004100	FORTH TED J			41257 RIETH RD	PENDLETON OR	97801	5
UMATILLA	1S33000004100	FORTH TED J			41257 RIETH RD	PENDLETON OR	97801	5
UMATILLA	1S33000004200	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	1S33000004300	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	1S34000000200	COOKE ANTHONY			4219 SW BROADLANE AVE	PENDLETON OR	97801-4228	6
UMATILLA	1S34000000300	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S34000000301	STRANDHOLM RUSSELL J & JILL L (TRS)			4174 SW PERKINS AVE	PENDLETON OR	97801-4276	6
OWNTILLY	100400000001	OTTOWN TO COLLET UND SILE E (TITO)			4174 OW 1 ENGINO AVE	I ENDEETON OIL	37001-4270	· ·
UMATILLA	1S34000000301	STRANDHOLM RUSSELL J & JILL L (TRS			4174 SW PERKINS AVE	PENDLETON OR	97801-4276	6
OWNTILLA	100400000001	OTTOWN TO COULD UN OILE E (TITO)	'		4174 OW 1 ENGINO AVE	I LINDLE FOR OIL	37001-4270	o
UMATILLA	1S34000000302	ANDERSON JOHN K & REBECCA E			3327 SW LADOW AVE	PENDLETON OR	97801-3658	6
UMATILLA	1S3400000302	MANESS FRANK E ET AL			PO BOX 323	PILOT ROCK OR	97868-0323	6
UMATILLA	1S34000000305	PICARD JOHN & PICARD DAWNITA			49829 RIVER RD	PENDLETON OR	97801-9723	6
UMATILLA	1S34000000305	JOHNSON PHILIP ROY & TAMARA SUE			2724 KYLE RD	KENNEWICK WA	99338-9310	6
UMATILLA	1S34000000306	JOHNSON PHILIP ROY & TAMARA SUE			2724 KYLE RD	KENNEWICK WA	99338-9310	6
UMATILLA	1S34000000300	PARKER RODNEY S & KAREN J			70827 SW DOUGLAS DR	PENDLETON OR	97801-9497	6
UMATILLA	1S34000000400 1S34000000500	STRANDHOLM RUSSELL J & JILL L (TRS)			PO BOX 386	PENDLETON OR	97801-9497	6
OWINTILLA	1334000000300	STRANDITOLINI ROSSELL S & SILL L (TRO)			1 O BOX 300	I LINDLE FOR OIL	97001	U
UMATILLA	1S3400000501	PARKER RODNEY S & KAREN J			70827 SW DOUGLAS DR	PENDLETON OR	97801-9497	6
UMATILLA	1S34000000501 1S34000000503	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLAIN BLVD STE 180			
				% HANCOCK FOREST MANAGEMENT		VANCOUVER WA	98683-7582	6
UMATILLA	1S34000002100	HARVEY CYNTHIA ANNE			77647 N LOOP RD	STANFIELD OR	97875-4544	6
UMATILLA	1S34000002300	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S34000002400	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801-0018	6
UMATILLA	1S34000002700	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S34000002700	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S35000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S35000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S35000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S35000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S35000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S35000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S35000000300	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S35000001100	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S35000002800	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S35000002800	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S35000005000	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	1S35000005000	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	1S35000005001	NORTHWEST PIPELINE CORP	C/O WILLIAMS CO INC AD VAL TX DEP		PO BOX 2400 MD 46-4	TULSA OK	74102	6

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County	MapTaxlot	Owner	Owner2	Owner3	Address	City State	Zip	Map(s)
UMATILLA	1S35000005090	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	1S35000005400	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S35000008100	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S35000008200	USA DEPT OF INTERIOR			46411 TIMINE WAY	PENDLETON OR	97801	6
UMATILLA	1S35000008200	LISA DEPT OF INTERIOR			46411 TIMINE WAY	PENDLETON OR	97801	6
UMATILLA	1S35000008300	USA (DEPT OF AGRICULTURE)	UMATILLA NATIONAL FOREST		PO BOX 3623	PORTLAND OR	97208	6, 7
UMATILLA	1S35000008600	USA (DEPT OF AGRICULTURE)	UMATILLA NATIONAL FOREST		PO BOX 3623	PORTLAND OR	97208	7
UMATILLA	1S35000008700	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	1S35000008700	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
			O/O TIMINOCONT ONEOT WIMIN NO CHWEINT					
UMATILLA	1S35000008800	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801-0018	6
UMATILLA	1S35000008900	SKILLMAN E MARGARET (LE) ETAL	C/O BRIAN SKILLMAN		38106 REITH RD	ECHO OR	97826	6
UMATILLA	1S35000009900	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	1S35000010000	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLAIN BLVD	VANCOUVER WA	98683-7582	6
UMATILLA	1S35000010200	CUNNINGHAM SHEEP CO		WINDOON ONLO INDIVIDUAL	PO BOX 1186	PENDLETON OR	97801	6. 7
			A COST MANIA OFMENT OF OTION					- /
UMATILLA	1S35000010300	STATE OF OREGON DEPT OF STATE	ASSET MANAGEMENT SECTION		775 SUMMER ST NE STE 100	SALEM OR	97301-1279	7
		LANDS						
UMATILLA	1S35000010400	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	1S35000010700	DEGROFFT RYAN D & DEGROFFT TIAH			1115 NW DESPAIN AVE	PENDLETON OR	97801-1573	6
		JILI						
LINANTILLA	1005000010000	OILL .			4007 OM ATHENO AVE	DENDI ETON OD	07001 1011	^
UMATILLA	1S35000010800	WHITTEN BRIAN JOE & WHITTEN			1837 SW ATHENS AVE	PENDLETON OR	97801-4011	6
		GREGORY DUAN						
UMATILLA	1S35000011200	USA DEPT OF INTERIOR			46411 TIMINE WAY	PENDLETON OR	97801	6
UMATILLA	1S35000011300	SKILLMAN E MARGARET (LE) ETAL	C/O BRIAN SKILLMAN		38106 REITH RD	ECHO OR	97826	6
UMATILLA	1S35000011300 1S35000012200				38106 REITH RD	ECHO OR	97826	6
		SKILLMAN E MARGARET (LE) ETAL	C/O BRIAN SKILLMAN					
UMATILLA	1S35070000300	MANEY PATRICK HAROLD & TRUDY GAY			82516 S JUNIPER CANYON RD	HELIX OR	97835	6
UMATILLA	1S35070000400	SMITH DEREESA ETAL	MELINDA MCCALL		31919 N LAKE CREEK DR UNIT 1	TANGENT OR	97389-9742	6
UMATILLA		FOX FAMILY REVOCABLE LIVING TRUST	WEELINDA WOOALE	WHITE FAMILY TOLICT		TERREBONNE OR		6
UWATILLA	1S35070000500	FUX FAMILY REVUCABLE LIVING TRUST		WHITE FAMILY TRUST	PO BOX 183	TERREBUNNE OR	97760	0
		&						
UMATILLA	1S35090000800	USA DEPT OF INTERIOR			46411 TIMINE WAY	PENDLETON OR	97801	6
UMATILLA	1S35090000900	CAMP MEACHAM LLC	C/O GREG & LOIS PHILLIPS		PO BOX 100	WESTON OR	97886-0100	6
UMATILLA	1S35090001500	GILLSON MILO M 50% & GILLSON	0/0 0/120 0 20/0 / / //22// 0		80240 S EDWARDS RD	HERMISTON OR	97838-6564	6
UNIATILLA	1333090001300				00240 O EDWANDO ND	TIERWISTON OR	97030-0304	U
		SHIRLEY G						
UMATILLA	1S35090001800	USA DEPT OF INTERIOR			46411 TIMINE WAY	PENDLETON OR	97801	6
UMATILLA	1S35090001900	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	1S36000000400	USA (DEPT OF AGRICULTURE)	UMATILLA NATIONAL FOREST		PO BOX 3623	PORTLAND OR	97208	7
UMATILLA	1S360000000800	USA (DEPT OF AGRICULTURE)	UMATILLA NATIONAL FOREST		PO BOX 3623	PORTLAND OR	97208	7
UMATILLA	1S36000000801	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	7
UMATILLA	1S36000001600	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	7
UMATILLA	1S36000001670	STATE OF OREGON	ODOT TECH CNTR PROP MGMT #42500		4040 FAIRVIEW INDUSTRIAL DR SE MS2	SALEM OR	97302-1142	7
UMATILLA	1S36000001680	STATE OF OREGON	ODOT TECH CNTR PROP MGMT #42500		4040 FAIRVIEW INDUSTRIAL DR SE MS2		97302-1142	7
	1S36000001690	STATE OF OREGON						
UMATILLA			ODOT TECH CNTR PROP MGMT #42500		4040 FAIRVIEW INDUSTRIAL DR SE MS2		97302-1142	7
UMATILLA	1S36000001700	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	7
UMATILLA	1S36000001900	USA (DEPT OF AGRICULTURE)	UMATILLA NATIONAL FOREST		PO BOX 3623	PORTLAND OR	97208	7
UMATILLA	1S36000002000	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	7
UMATILLA	1S36000002100	PENDLETON RANCHES INC	O/O III WOOOM ONEO I MII WOOEMEN		PO BOX 1186	PENDLETON OR	97801	7
UMATILLA		JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLAIN BLVD STE 180		98683-7582	
	1S36000002200			% HANCOCK FOREST MANAGEMENT		VANCOUVER WA		7
UMATILLA	1S36000002900	SADLER JAY ALLEN & SADLER JAMES			25210 NE 50TH AVE	RIDGEFIELD WA	98642-8116	7
		ERNEST						
UMATILLA	1S36000003000	USA (DEPT OF AGRICULTURE)	UMATILLA NATIONAL FOREST		PO BOX 3623	PORTLAND OR	97208	7
UMATILLA	1S37000000100	USA (DEPT OF AGRICULTURE)	UMATILLA NATIONAL FOREST		PO BOX 3623	PORTLAND OR	97208	7
			UWATILLA NATIONAL FOREST					
UMATILLA	2S3000000100	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	4
UMATILLA	2S3000000500	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S30000000501	MILTENBERGER ED ET AL			803 SW COURT AVE	PENDLETON OR	97801-1910	4
UMATILLA	2\$30000000600	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S300000000600	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S30000000680	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2\$30000000690	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S30000000700	CUNNINGHAM SHEEP AND LAND	PENDLETON RANCHES INC		PO BOX 1186	PENDLETON OR	97801-0018	4
		COMPANY &						
UMATILLA	2S30000000800	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S30000000900	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S3000001300	CUNNINGHAM SHEEP AND LAND	PENDLETON RANCHES INC		PO BOX 1186	PENDLETON OR	97801-0018	4
		COMPANY &						
UMATILLA	2\$3000001300	CUNNINGHAM SHEEP AND LAND	PENDLETON RANCHES INC		PO BOX 1186	PENDLETON OR	97801-0018	4
UNIATILLA	2550000001500		T ENDEET ON TANCILES INC		TO BOX 1100	I LINDLE TON OIL	37001-0010	-
		COMPANY &						
UMATILLA	2S30000001601	SPIN & MARTY LLC			14312 STENBOCK RD NE # F	AURORA OR	97002-9466	4
UMATILLA	2S30000001601	SPIN & MARTY LLC			14312 STENBOCK RD NE # F	AURORA OR	97002-9466	4
UMATILLA	2S31000000500	MCCALL CONNIE JOANN ET AL	C/O 83 RANCH		64565 BEAR CREEK RD	PILOT ROCK OR	97868-6639	4
UMATILLA	2S31000000500	MCCALL CONNIE JOANN ET AL	C/O 83 RANCH		64565 BEAR CREEK RD	PILOT ROCK OR	97868-6639	4
UMATILLA	2S31000000500	MCCALL CONNIE JOANN ET AL	C/O 83 RANCH		64565 BEAR CREEK RD	PILOT ROCK OR	97868-6639	4
UMATILLA	2S31000000500	MCCALL CONNIE JOANN ET AL	C/O 83 RANCH		64565 BEAR CREEK RD	PILOT ROCK OR	97868-6639	4
UMATILLA	2\$31000000500	MCCALL CONNIE JOANN ET AL	C/O 83 RANCH		64565 BEAR CREEK RD	PILOT ROCK OR	97868-6639	4
UMATILLA	2S31000000500	MCCALL CONNIE JOANN ET AL	C/O 83 RANCH		64565 BEAR CREEK RD	PILOT ROCK OR	97868-6639	4
			O/O 00 IVANOIT					
UMATILLA	2S31000000500A1	MCCALL CONNIE			64565 BEAR CREEK RD	PILOT ROCK OR	97868-6639	4
UMATILLA	2S31000000503	MCCALL CONNIE JOANN ET AL	C/O 83 RANCH		64565 BEAR CREEK RD	PILOT ROCK OR	97868-6639	4
UMATILLA	2S31000000503	MCCALL CONNIE JOANN ET AL	C/O 83 RANCH		64565 BEAR CREEK RD	PILOT ROCK OR	97868-6639	4
UMATILLA	2S31000000600	CUNNINGHAM SHEEP & LAND CO			PO BOX 1186	PENDLETON OR	97801	4
UMATILLA	2S31000000000 2S31000001200	NEVA L HASCALL REVOCABLE TRUST ET			PO BOX 583	PILOT ROCK OR	97868-0583	4
UNATILLA	200 100000 1200				FO BOX 363	FILUT ROCK OR	97000-0063	4
		AL						

County	MapTaxlot	Owner	Owner2	Owner3	Address	City State	Zip	Map(s)
UMATILLA	2S31000001200	NEVA L HASCALL REVOCABLE TRUST ET			PO BOX 583	PILOT ROCK OR	97868-0583	4
UMATILLA	2S31000002100	PHELPS JAMES V & PATSY A (TRS)			47019 KIRKPATRICK RD	PENDLETON OR	97801-6063	4
UMATILLA	2S31000002300	WENTZ JOANNE			68865 ELK MOUNTAIN RD	ENTERPRISE OR	97828-3088	4
UMATILLA	2S32000000100	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	2S32000000200	CLARKE VERA A (TRS) & TJL RANCH LLC	C/O MITTENTHAL JUDITH ANN		1420 NW GILMAN BLVD SUITE 2 #2655	ISSAQUAH WA	98027-5333	5
UMATILLA	2S32000000200	CLARKE VERA A (TRS) & TJL RANCH LLC	C/O MITTENTHAL JUDITH ANN		1420 NW GILMAN BLVD SUITE 2 #2655	ISSAQUAH WA	98027-5333	5
UMATILLA	2S32000000300	HUMPHREYS HELEN B (TRS)			65717 E BIRCH CREEK RD	PILOT ROCK OR	97868-6610	5
UMATILLA	2S32000000400	HUMPHREYS HELEN B (TRS)			65717 E BIRCH CREEK RD	PILOT ROCK OR	97868-6610	5
UMATILLA	2S32000000500	DRAPER JESSEN TRUDY			PO BOX 388	PILOT ROCK OR	97868-0338	5
UMATILLA	2S32000000500	DRAPER JESSEN TRUDY			PO BOX 388	PILOT ROCK OR	97868-0338	5
UMATILLA	2S32000000601	HATLEY JAMES D & EVELYN E			PO BOX 458	PILOT ROCK OR	97868	5
UMATILLA	2S32000000700U1	HEMPHILL RICHARD C & JEAN E (TRS) ETAL			PO BOX 189	PILOT ROCK OR	97868-0189	5
UMATILLA	2S32000000700U2	SAUNDERS RICHARD ETAL 33.40 ETAL 66.60%			500 POWDER HORN PASS	BROOKINGS SD	57006-4629	5
UMATILLA	2S32000000700U3	GLOVER RICHARD &JULIA (TRS) 1/6 ETAL 5/6			1815 SAINT FRANCIS WAY	SAN CARLOS CA	94070-4728	5
UMATILLA	2S32000000700U4	GLOVER DW & M (TRS) 1/6 ETAL 5/6			906 LAMESA DR	PORTOLA VALLEY CA	94028	5
UMATILLA	2S32000000900	WEINKE MARY K ET AL			PO BOX 547	PILOT ROCK OR	97868-0547	5
UMATILLA	2S32000001000	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S32000001000	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S32000001001	FURNISH WILLIAM J ET AL		RMM TRUST ET AL	707 SE 6TH	PENDLETON OR	97801	5
UMATILLA	2S32000001001	FURNISH WILLIAM J ET AL		RMM TRUST ET AL	707 SE 6TH	PENDLETON OR	97801	5
UMATILLA	2S32000001100	STANDLEY JOHN R			134 NE ELM ST	PILOT ROCK OR	97868-6671	5
UMATILLA	2S32000001200	STANDLEY JOHN R			134 NE ELM ST	PILOT ROCK OR	97868-6671	5
UMATILLA	2S32000001201	STANDLEY JOHN R			134 NE ELM ST	PILOT ROCK OR	97868-6671	5
UMATILLA	2S32000001201	STANDLEY JOHN R			134 NE ELM ST	PILOT ROCK OR	97868-6671	5
UMATILLA	2S32000001300	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S32000001300	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S32000001300	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S32000001400	LUKE JULIE D			2478 FALCONCREST LOOP	RICHLAND WA	99352	5
UMATILLA	2S32000001600	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S32000001702	NEVA L HASCALL REVOCABLE TRUST ET	Г		PO BOX 583	PILOT ROCK OR	97868-0583	5
UMATILLA	2S32000001702	NEVA L HASCALL REVOCABLE TRUST ET AL	Г		PO BOX 583	PILOT ROCK OR	97868-0583	5
UMATILLA	2S32000001800	WARNER MARK S			62176 W BIRCH CREEK RD	PILOT ROCK OR	97868	5
UMATILLA	2S32000001800	WARNER MARK S			62176 W BIRCH CREEK RD	PILOT ROCK OR	97868	5
UMATILLA	2S32000001800	WARNER MARK S			62176 W BIRCH CREEK RD	PILOT ROCK OR	97868	5
UMATILLA	2S32000001800	WARNER MARK S			62176 W BIRCH CREEK RD	PILOT ROCK OR	97868	5
UMATILLA	2S32000001800	WARNER MARK S			62176 W BIRCH CREEK RD	PILOT ROCK OR	97868	5
UMATILLA	2S32000001800	WARNER MARK S			62176 W BIRCH CREEK RD	PILOT ROCK OR	97868	5
UMATILLA	2S32000001800	WARNER MARK S			62176 W BIRCH CREEK RD	PILOT ROCK OR	97868	5
UMATILLA	2S32000001800	WARNER MARK S			62176 W BIRCH CREEK RD	PILOT ROCK OR	97868	5
UMATILLA	2S32000001800	WARNER MARK S			62176 W BIRCH CREEK RD	PILOT ROCK OR	97868	5
UMATILLA	2S32000002000	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S32000002200	RUPP WILLIAM			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S32000002300	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5 5
UMATILLA	2S32000002400	MENTZER ANDREW NORMAN			49464 E POVERTY FLAT RD 420 ROAD 49	PENDLETON OR	97801-9018	
UMATILLA UMATILLA	2S32000002600	RUPP WILLIAM F & ROSA M USA	DUDEAU OF LAND MCT			PASCO WA PORTLAND OR	99301-3040	5 5
	2S32000002700		BUREAU OF LAND MGT		PO BOX 2965		97208	
UMATILLA UMATILLA	2S32000002800 2S32100000100	RUPP WILLIAM F & ROSA M WEINKE MARY K ET AL			420 ROAD 49 PO BOX 547	PASCO WA PILOT ROCK OR	99301-3040 97868-0547	5 5
UMATILLA	2S32100000100 2S32100000100	WEINKE MARY K ET AL WEINKE MARY K ET AL			PO BOX 547 PO BOX 547	PILOT ROCK OR	97868-0547	5
UMATILLA	2S32100000100 2S32100000400	JESSEN TRUDY L			PO BOX 388	PILOT ROCK OR	97868-0388	5
UMATILLA	2S33000000900	FORTH TED J			41257 RIETH RD	PENDLETON OR	97801	5
UMATILLA	2S33000000900 2S33000001000	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	2S33000001000 2S33000001100	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	2833000001100	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	2\$3300001200	CLARKE VERA A (TRS) & TJL RANCH LLC	C/O MITTENTHAL JUDITH ANN		1420 NW GILMAN BLVD SUITE 2 #2655	ISSAQUAH WA	98027-5333	5
UMATILLA	2S33000001409	MYERS LARENA (TRS)			PO BOX 678	LA PINE OR	97739-0678	5
UMATILLA	2S33000001416	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S33000002900	LUKE JULIE D			2478 FALCONCREST LOOP	RICHLAND WA	99352	5
UMATILLA	2S33000002900	LUKE JULIE D			2478 FALCONCREST LOOP	RICHLAND WA	99352	5
UMATILLA	2\$33000003300	DETHLEFS ROBERT L & DETHLEFS ANITA M			12042 SE SUNNYSIDE RD PMB 596	CLACKAMAS OR	97015-8382	5
UMATILLA	2S33000004300	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S33000004400	USA	BUREAU OF LAND MGT		PO BOX 2965	PORTLAND OR	97208	5
UMATILLA	2S35000000100	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	2S350000000100	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	3S32000000000000	WARNER MARK S			PO BOX W	PILOT ROCK OR	97868-0350	5
UMATILLA	3S32000000400	WARNER MARK S			62284 W BIRCH CREEK RD	PILOT ROCK OR	97868	5
UMATILLA	3S32000000400 3S32000000500	WARNER MARK S			62284 W BIRCH CREEK RD	PILOT ROCK OR	97868-6644	5
UMATILLA	3S32000000300	NEVA L HASCALL REVOCABLE TRUST ET	Г		PO BOX 583	PILOT ROCK OR	97868-0583	5
UMATILLA	3S3300000100	AL USA (DEPT OF AGRICULTURE)	UMATILLA NATIONAL FOREST		PO BOX 3623		97208	
UNION	01S35E00300	OREGON STATE OF DOT	UMATILLA NATIONAL FOREST	ATTN OREGON PARKS & REC DEPT	725 SUMMER ST SUITE C	PORTLAND OR SALEM OR	97208 97301	5 6

Carretii	ManTaulat	0	0	O	Address	City State	7:	Man(a)
County UNION	MapTaxlot	Owner IOUN HANCOCK LIFE INCLIDANCE CO.	Owner2	Owner3	Address	City State	Zip 98683	Map(s)
	01S35E00600	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA		6
UNION	01S35E01100	GOLDEN POND TIMBERLANDS INC		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	6, 7
UNION	01S35E01500	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801-0018	6, 7
UNION	02S35E00100	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	6, 7
UNION	02S35E00300	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801-0018	7
UNION	02S35E00400	GREEN DIAMOND RESOURCE COMPANY	<b>/</b>		8809 LENOX POINT DR 3B	CHARLOTTE NC	28273	6, 7, 8
ONION	02000200400	CITELIA DILINICIAD ILEGOCITOE COMI ANA			OOOS ELINOX I OINT DI OB	OTTAILEOTTE NO	20210	0, 1, 0
UNION	02S35E00600	GREEN DIAMOND RESOURCE COMPANY	<b>(</b>		8809 LENOX POINT DR 3B	CHARLOTTE NC	28273	6
UNION	02S35E00602	SYSTEM GLOBAL TIMBERLANDS LLC		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	6
UNION	02S35E00700	SYSTEM GLOBAL TIMBERLANDS LLC		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	6
UNION	02S35E01800	USA FOREST			BOX	LA GRANDE OR	97850	8
UNION	02S36E00100	USA FOREST			BOX	LA GRANDE OR	97850	7, 8
UNION					BOX		97850	7, 0
	02S36E00101	USA BLM				LA GRANDE OR		
UNION	02S36E00102	USA BLM			BOX	LA GRANDE OR	97850	7
UNION	02S36E00400	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	7
UNION	02S36E00500	ALLEN WARREN & SANDRA			PO BOX 681	ELGIN OR	97827	7
UNION	02S36E00701	MCLAUGHLIN LARRY & CHARLOTTE	MCLAUGHLIN BRAD & KELLY		67310 SHAW CREEK RD	ELGIN OR	97827	7
UNION	02S36E00703	ALLEN WARREN & SANDRA			PO BOX 681	ELGIN OR	97827	7
UNION	02S36E00704	MCLAUGHLIN LARRY & CHARLOTTE	MCLAUGHLIN BRAD & KELLY		67310 SHAW CREEK RD	ELGIN OR	97827	7
UNION	02S36E00900	GOLDEN POND TIMBERLANDS INC	MOD TO OTTEN BIT OF A TREEF	% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	7
				M HANCOCK FOREST MANAGEMENT				7
UNION	02S36E01000	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801-0018	7
UNION	02S36E01700	FROST KATHERINE LOIS ETAL			62 ELM WILLOW COURT	SPRING TX	77382	1
UNION	02S36E01900	FURST ROBERT S & PATTY JO			2120 S RESERVE ST #249	MISSOULA MT	59801	8
UNION	02S36E01901	HABBERSTAD JOHN L			10530 W LAKE FOREST LOOP	RATHDRUM ID	83858	8
UNION	02S36E01902	HABBERSTAD JOHN L 3/4 ETAL			10530 W LAKE FOREST LOOP	RATHDRUM ID	83858	8
UNION	02S36E01903	RUPP WILLIAM F ETAL			176 KRANICHWOOD ST	RICHLAND WA	99352-8458	8
UNION	02S36E01904	FURST ROBERT S & PATTY JO			2120 S RESERVE ST #249	MISSOULA MT	59801	8
UNION								-
	02S36E02100	ARNOLD MATTIE M		ATTAL ZIMANEDI V ANUTA	8404 E BRIDGEPORT AVE	SPOKANE WA	99212-1916	8
UNION	02S36E02300	ZIMMERLY CANDELARIA 1/2 ETAL		ATTN ZIMMERLY ANITA	76904 MCCORMMACH RD	PENDLETON OR	97801-9504	8
UNION	02S36E02400	FOREST RECOVERY INC		ATTN DAVID GRANGER	51280 AVENIDA ALVARDO	LA QUINTA CA	92253	8
UNION	02S36E02700	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	8
UNION	02S36E02801	BOSTON TIMBER OPPORTUNITIES		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	8
UNION	02S36E02900	USA BLM			BOX	LA GRANDE OR	97850	8
UNION	02S36E03100	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	02S36E03101	USA FOREST			BOX	LA GRANDE OR	97850	8
				ATTN ODECON DADIC & DEC DEDT				
UNION	02S36E03190	OREGON STATE OF DOT		ATTN OREGON PARKS & REC DEPT	725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	02S36E03300	CALDWELL PETER D 3/10 ETAL			62301 FRUITDALE LN	LA GRANDE OR	97850-5315	8
UNION	02S36E03400	YOUNG HARLEY B II			PO BOX 98	HEPPNER OR	97836	8
UNION	02S36E03500	USA BLM			BOX	LA GRANDE OR	97850	8
UNION	02S36E03600	OREGON STATE OF DOT		RIGHT OF WAY SECTION	355 CAPITAL ST NE RM 420	SALEM OR	97301-3870	8
UNION	02S36E03800	SCHILLER MARILYN			69958 SCHILLER DR	ECHO OR	97826-9044	8
UNION	02S36E04000	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	02S36E0700200	GOLDEN POND TIMBERLANDS INC		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	7
UNION	02S36E0700300	PENDLETON RANCHES INC		70 TH W GOOK T OI (201 HH W GOOK)	PO BOX 1186	PENDLETON OR	97801-0018	7
UNION	02S36E0700400	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	7
UNION	02S36E0700500	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	7
UNION	02S36E0700600	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801-0018	7
UNION	02S36E0700700	WOSTEL RANDALL P DD			1512 EAST 11TH ST	THE DALLES OR	97058	7
UNION	02S36E0700800	SMITH SUSAN M 1/3 ETAL			PO BOX 45	PENDLETON OR	97801-0045	7
UNION	02S36E0700900	USA FOREST			BOX	LA GRANDE OR	97850	7, 8
UNION	02S36E0701000	USA FOREST			BOX	LA GRANDE OR	97850	7, 8
UNION	02S36E0701100	HANCOCK TIMBERLAND X INC		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLAIN BLVD #180	VANCOUVER WA	98683	7
UNION	02S36E0701900	GUTZ TREE FARM LLC			7086 N RENDEZVOUS DR	COEUR D ALENE ID	83815-0059	7, 8
UNION	02S37E00100	USA FOREST			BOX	LA GRANDE OR	97850	7, 8
UNION	02S37E01500	TERRY & JULENE DAUGHTERY FAM			PO BOX 328 TRUST	ADRIAN OR	97901	8
UNION	02S37E01500 02S37E03100	USA FOREST			BOX	LA GRANDE OR	97850	8
				ATTN CUDIC CII DEDNACI E				
UNION	02S37E3100500	SILBERNAGEL GEORGIE		ATTN CHRIS SILBERNAGLE	58148 HILGARD LN	LA GRANDE OR	97850-5132	8
UNION	02S37E3100501	MCCULLOUGH JOSHUA & LINDSEY			59154 FIVE POINT CREEK RD	LA GRANDE OR	97850-5110	8
UNION	02S37E3100502	FINE DANIEL G ETAL			60006 FIVE POINT CREEK RD	LA GRANDE OR	97850	8
UNION	02S37E3100600	USA FOREST			BOX	LA GRANDE OR	97850	8
UNION	02S37E3100603	OREGON STATE OF		ATTN OREGON PARKS & REC DEPT	725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	02S37E3100604	OREGON STATE OF		ATTN OREGON PARKS & REC DEPT	725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	02S37E3101200	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION					1904 ADAMS AVE	LA GRANDE OR	97850	
	02S37E3101300	516 RANCH PARTNERSHIP ETAL						8
UNION	02S37E3101301	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	02S37E3101302	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	02S37E3101400	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	03S35E00100	USA FOREST			BOX	LA GRANDE OR	97850	8
UNION	03S36E00100	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	03S36E00200	SCHILLER MARILYN			69958 SCHILLER DR	ECHO OR	97826-9044	8
UNION	03S36E00300	HAMPTON FAMILY TRUST			P O DRAWER K	LA GRANDE OR	97850-0348	8
UNION	03S36E00500	USA FOREST			BOX	LA GRANDE OR	97850	8
UNION	03S37E00200	516 RANCH PARTNERSHIP ETAL			1904 ADAMS AVE	LA GRANDE OR	97850	8
UNION					1904 ADAMS AVE			
	03S37E00500	516 RANCH PARTNERSHIP ETAL				LA GRANDE OR	97850	8
UNION	03S37E00501	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	03S37E00600	516 RANCH PARTNERSHIP ETAL			1904 ADAMS AVE	LA GRANDE OR	97850	8
UNION	03S37E00601	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	03S37E00700	OREGON STATE OF PARKS & REC			725 SUMMER ST SUITE C	SALEM OR	97301	8
UNION	03S37E00800	SCHILLER MARILYN			69958 SCHILLER DR	ECHO OR	97826-9044	8
UNION	03S37E00801	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	8

County	MapTaxlot	Owner	Owner2	Owner3		Address	City State	Zip	Map(s)
UNION	03S37E00900	D L & D J YOUNGMAN REV TRUST				6506 CREST DR	NEWCASTLE CA	95658	8
UNION	03S37E01000	HAMPTON FAMILY TRUST				P O DRAWER K	LA GRANDE OR	97850-0348	8
UNION	03S37E01100	USA BLM				BOX	LA GRANDE OR	97850	8
UNION	03S37E01300	WILLIAMS JOHN COLLIER				PO BOX 1384	LA GRANDE OR	97850-6384	8
UNION	03S37E01302	HOORAY LLC				PO BOX 290	KINGMAN KS	67068	8
UNION	03S37E01303	MORELLO KATHRYN				PO BOX 147	LA GRANDE OR	97850-0147	8
UNION	03S37E01900	LA GRANDE CITY OF				PO BOX 670	LA GRANDE OR	97850-0670	8
UNION	03S37E02600	516 RANCH PARTNERSHIP ETAL				1904 ADAMS AVE	LA GRANDE OR	97850	8
UNION	03S37E2400600	LESTER ROBERT G				3205 N COLUMBIA ST	LA GRANDE OR	97850-4002	8
UNION	03S37E2400700	N A & B A LARKIN REV LIV TRUST				62184 GAERTNER LN	LA GRANDE OR	97850-5115	8
UNION	03S37E2400800	LARKIN GREGORY D & EILEEN J				59655 MORGAN LAKE RD	LA GRANDE OR	97850	8
UNION	04S39E09000	N & C LAND LLC				71062 PERKINS RD	ECHO OR	97826-9036	9
UNION	05S38E00200	N & C LAND LLC				71062 PERKINS RD	ECHO OR	97826-9036	9
UNION	05S38E01200	N & C LAND LLC				71062 PERKINS RD	ECHO OR	97826-9036	9
UNION	05S39E00300	N & C LAND LLC				71062 PERKINS RD	ECHO OR	97826-9036	9
UNION	05S39E00600	N & C LAND LLC				71062 PERKINS RD	ECHO OR	97826-9036	9
UNION	05S39E00800	N & C LAND LLC				71062 PERKINS RD	ECHO OR	97826-9036	9
UNION	05S39E00900	N & C LAND LLC				71062 PERKINS RD	ECHO OR	97826-9036	9
UNION	05S39E00900	N & C LAND LLC				71062 PERKINS RD	ECHO OR	97826-9036	9
UNION	05S39E01000	COUNSELL DALE L & CHARLENE R				58441 PIERCE RD	LA GRANDE OR	97850-5252	9
UNION	05S39E01003	OREGON STATE OF DOT				BOX	LA GRANDE OR	97850	9
UNION	05S39E01100	N & C LAND LLC				71062 PERKINS RD	ECHO OR	97826-9036	9
UNION	05S39E01300	N & C LAND LLC				71062 PERKINS RD	ECHO OR	97826-9036	9
UNION	05S39E01600	OLSEN KIM ETAL				PO BOX 1683	WICKENBURG AZ	85358	9
UNION	05S39E02200	OLSEN KIM				PO BOX 1683	WICKENBURG AZ	85358	9
UNION	05S39E02300	OLSEN KIM				PO BOX 1683	WICKENBURG AZ	85358	9
UNION	05S39E02400	SSD LANDS LLC 90% ETAL				2300 KRUSE RD	PASCO WA	99301	9
UNION	05S39E02403	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MAN	AGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	9
UNION	05S39E02405	SSD LANDS LLC				2300 KRUSE RD	PASCO WA	99301	9
UNION	05S39E02500	OREGON STATE OF DOT				RED CINDER PIT	LA GRANDE OR	97850	9
UNION	05S39E02600	SSD LANDS LLC				2300 KRUSE RD	PASCO WA	98301	9
UNION	05S39E02800	WARD AGRICULTURAL PROPERTIES				1500 H ST LTD	BAKER CITY OR	97814-1930	9



# Figure 4-1 **RFA1 Site Boundary Changes**

Little Juniper Canyon Morrow County

## Map 1

Site Boundary Approved in Site Certificate

### Access

Existing Road, Substantial Modification, 21-70% Improvements

New Road, Bladed

New Road, Primitive

### Work Areas

Pulling and Tensioning

Structure Work Area

Transmission Centerline (Revised Alignment)

Important Siting Constraints and Other Features

20-ft Contours

Stream

Public Roads

### Land Status

Private

Not intended for construction or any uses

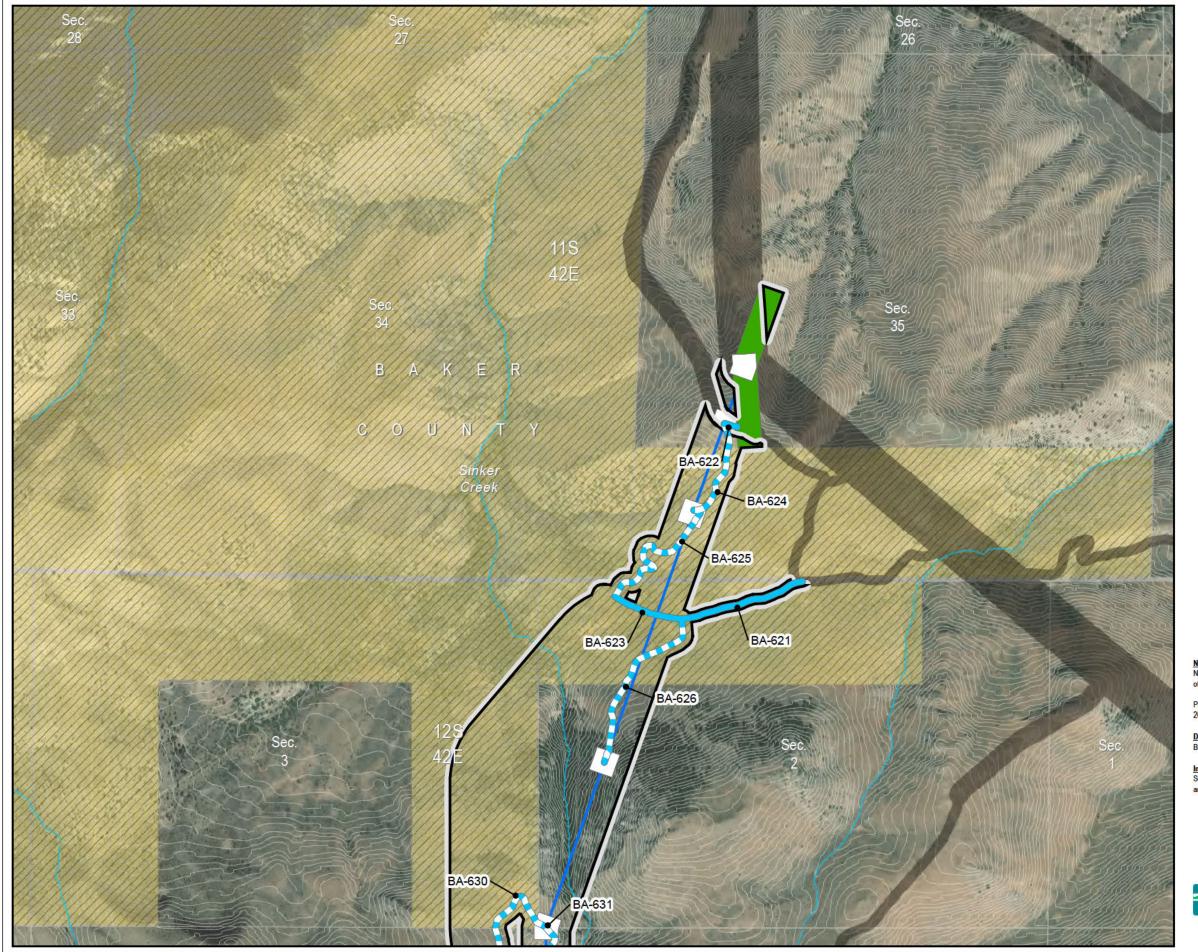
Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-1 **RFA1 Site Boundary Changes**

True Blue Gulch **Baker County** 

Map 2

Site Boundary Approved in Site Certificate

Existing Road, Substantial Modification, 71-100% Improvements

New Road, Bladed

Work Areas

Pulling and Tensioning

Structure Work Area

Transmission Centerline (Revised Alignment)

Important Siting Constraints and Other **Features** 

20-ft Contours

Stream

// VRM Class 2

Land Status

Bureau of Land Management

Private

Notes: Not intended for construction or any uses other than intended purpose.

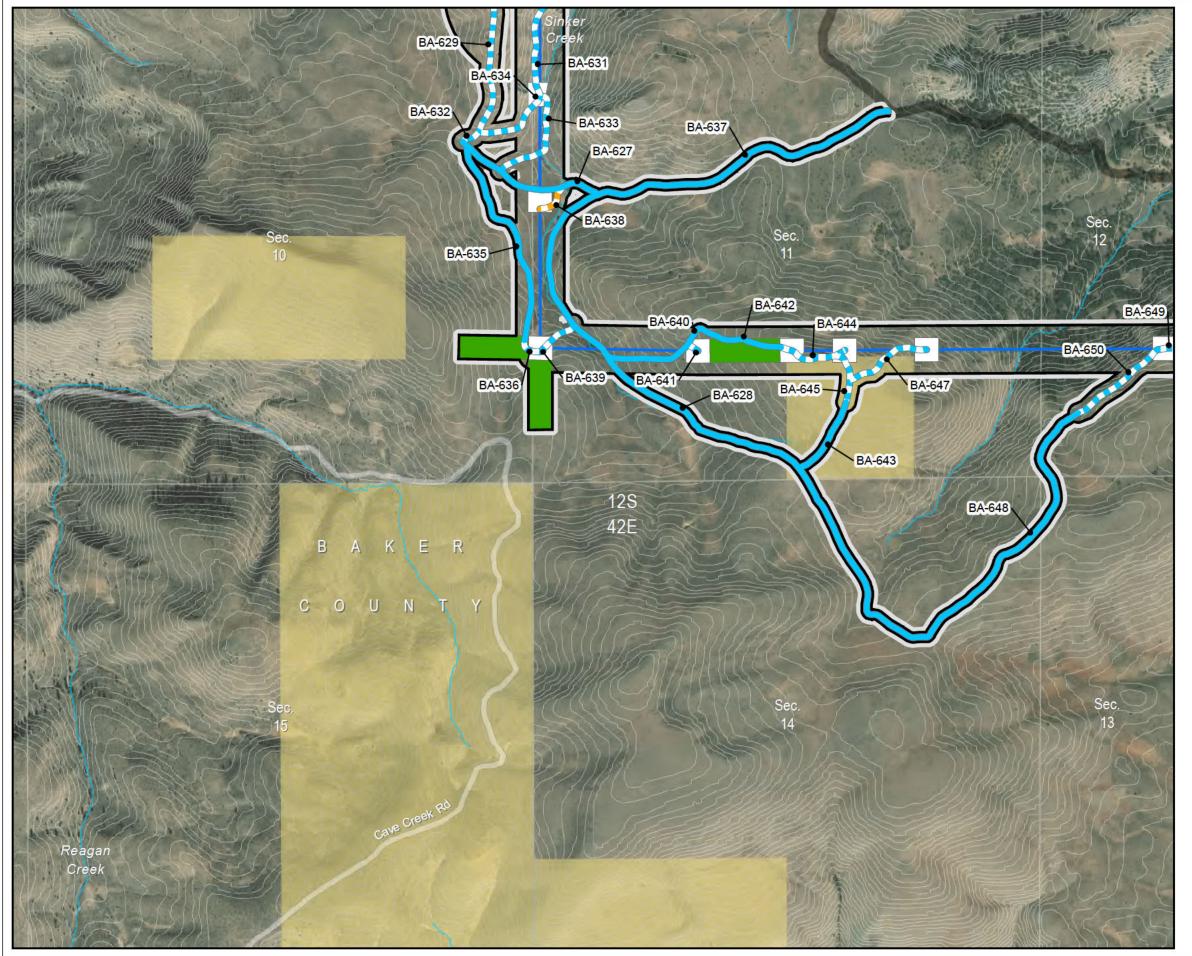
Project features current as of October 28, 2022.

Data Source(s):
BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-1 **RFA1 Site Boundary Changes**

True Blue Gulch **Baker County** 

## Map 3

Site Boundary Approved in Site Certificate

### Access

Existing Road, Substantial Modification, 71-100% Improvements

New Road, Bladed

New Road, Primitive

### Work Areas

Pulling and Tensioning

Structure Work Area Transmission Centerline (Revised Alignment)

Important Siting Constraints and Other

20-ft Contours

Features

Public Roads

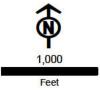
### Land Status

Bureau of Land Management

Private

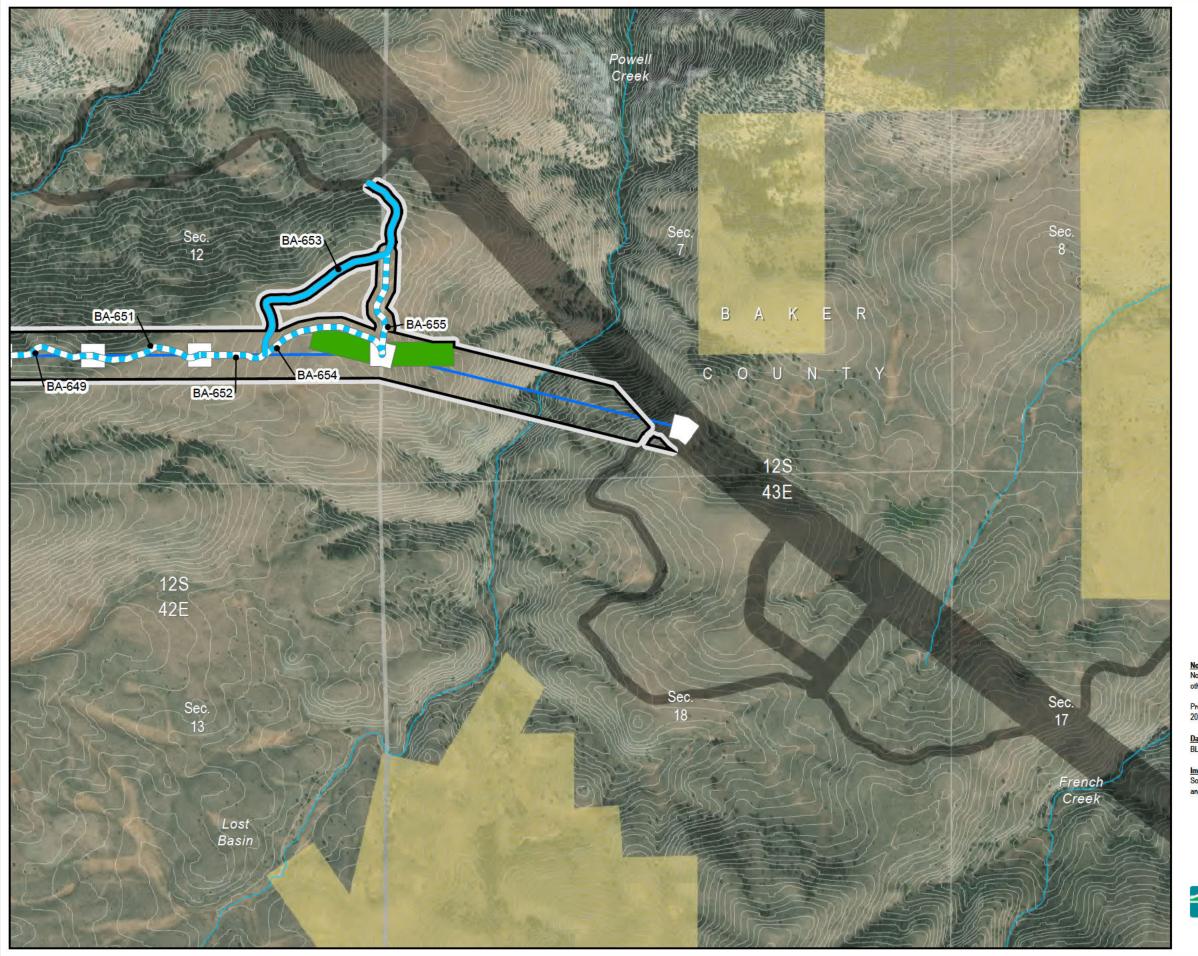
Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-1 **RFA1 Site Boundary Changes**

True Blue Gulch **Baker County** 

## Map 4

Site Boundary Approved in Site Certificate

Existing Road, Substantial Modification, 71-100% Improvements

New Road, Bladed

### Work Areas

Pulling and Tensioning

Structure Work Area

Transmission Centerline (Revised Alignment)

Important Siting Constraints and Other Features

20-ft Contours

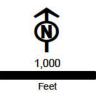
Stream Land Status

> Bureau of Land Management

Private

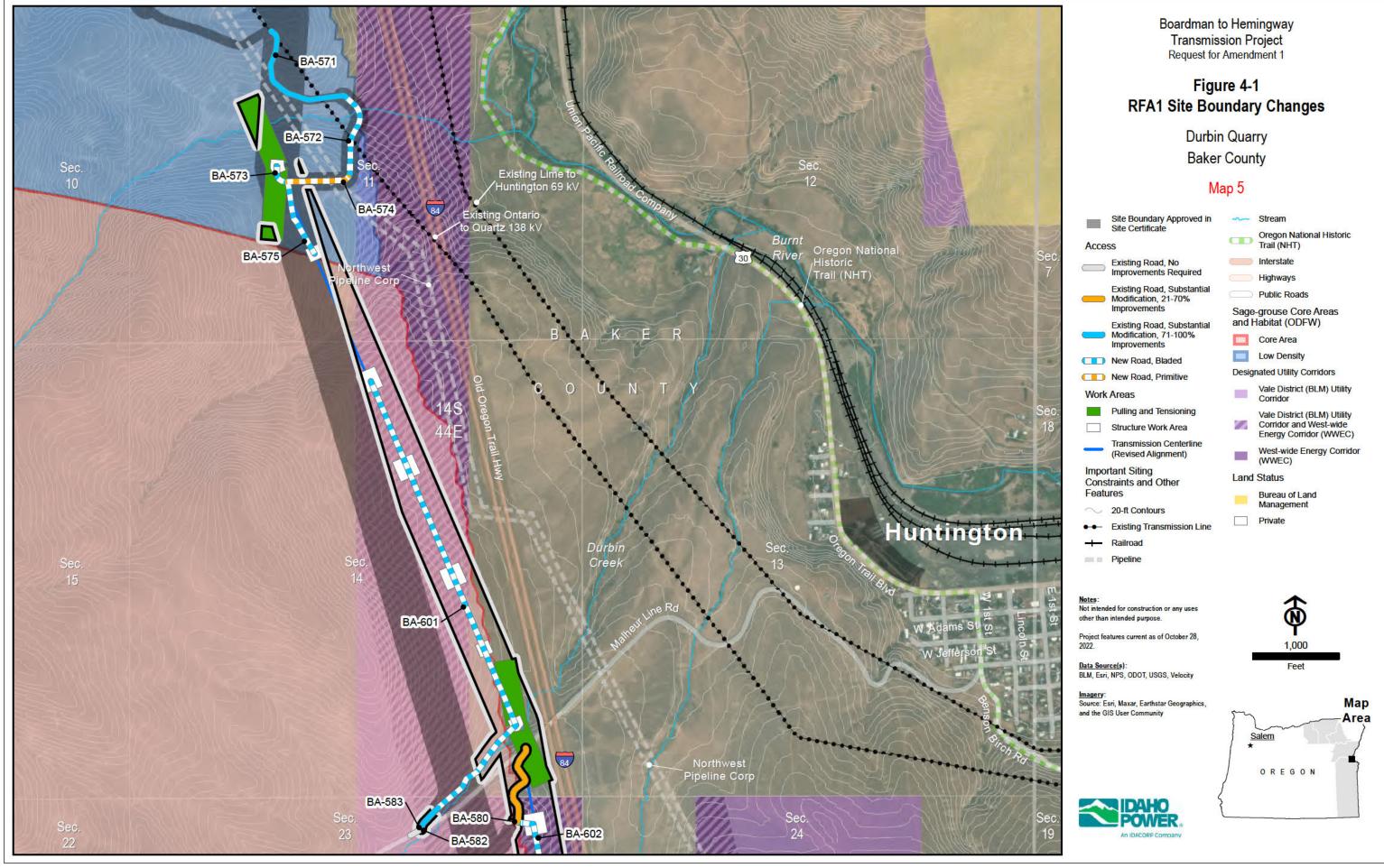
Project features current as of October 28, 2022.

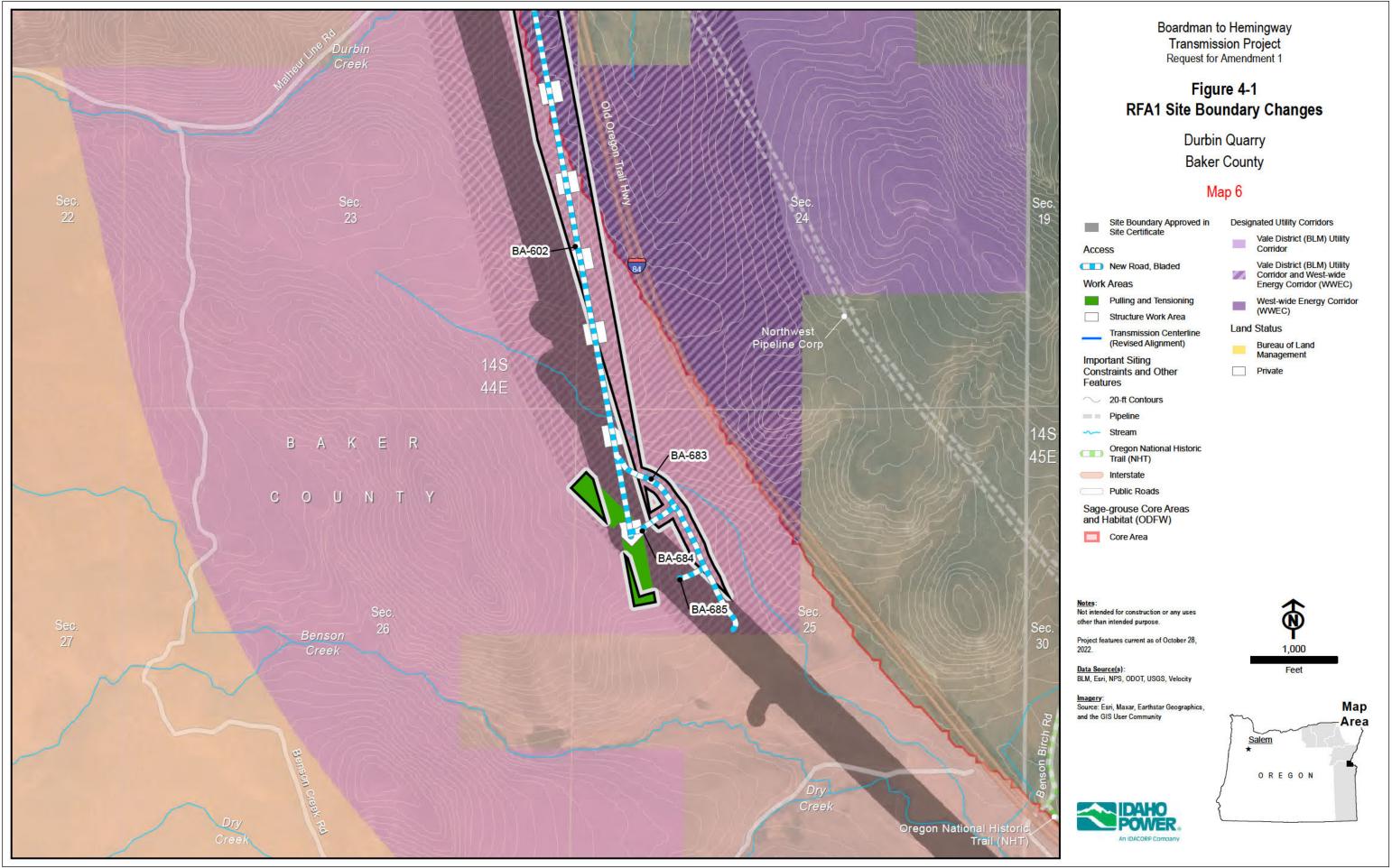
Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

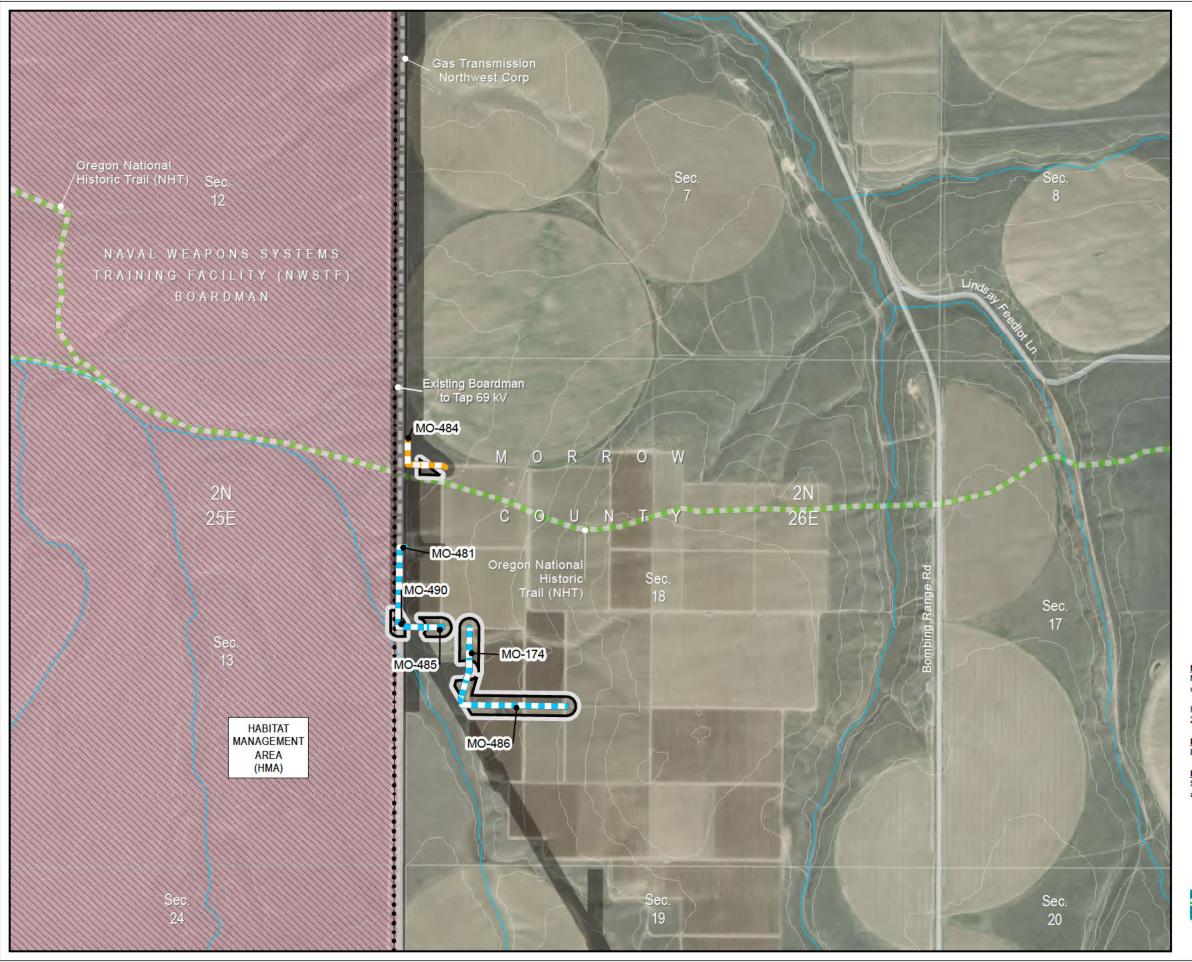












# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Morrow County

### Map 1

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

### Access

New Road, Bladed

New Road, Primitive

Important Siting Constraints and Other Features

20-ft Contours

■ Existing Transmission Line

Pipeline

Oregon National Historic Trail (NHT)

**Public Roads** 

Habitat Management Area

Land Status

Military Reservation or Corps of Engineers

Private

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Morrow County

## Map 2

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

● Existing Transmission Line

Public Roads

Habitat Management Area (HMA) 11

Land Status

Military Reservation or Corps of Engineers

Private

Not intended for construction or any uses

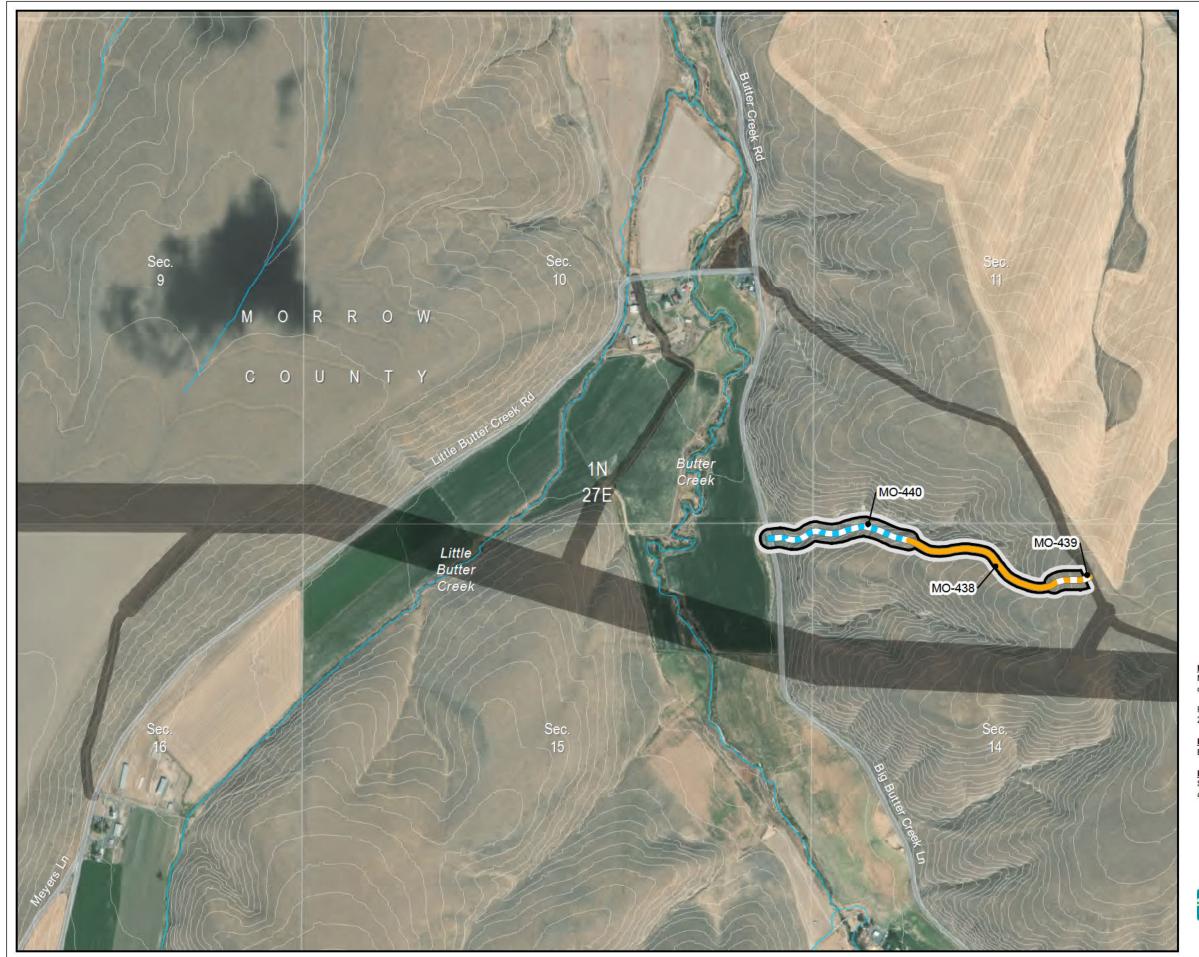
Project features current as of October 28,

and the GIS User Community









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Morrow County

Map 3

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

Existing Road, Substantial Modification, 21-70%

New Road, Bladed

New Road, Primitive

Important Siting Constraints and Other **Features** 

20-ft Contours

Public Roads

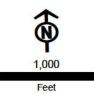
Land Status

Private

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Morrow County

## Map 4

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Bladed

New Road, Primitive

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

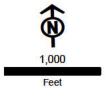
Land Status

Private

Not intended for construction or any uses

Project features current as of October 28,

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Umatilla County** 

Map 5

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

Existing Road, Substantial Modification, 21-70%

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

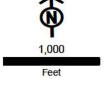
Land Status

Private

Not intended for construction or any uses

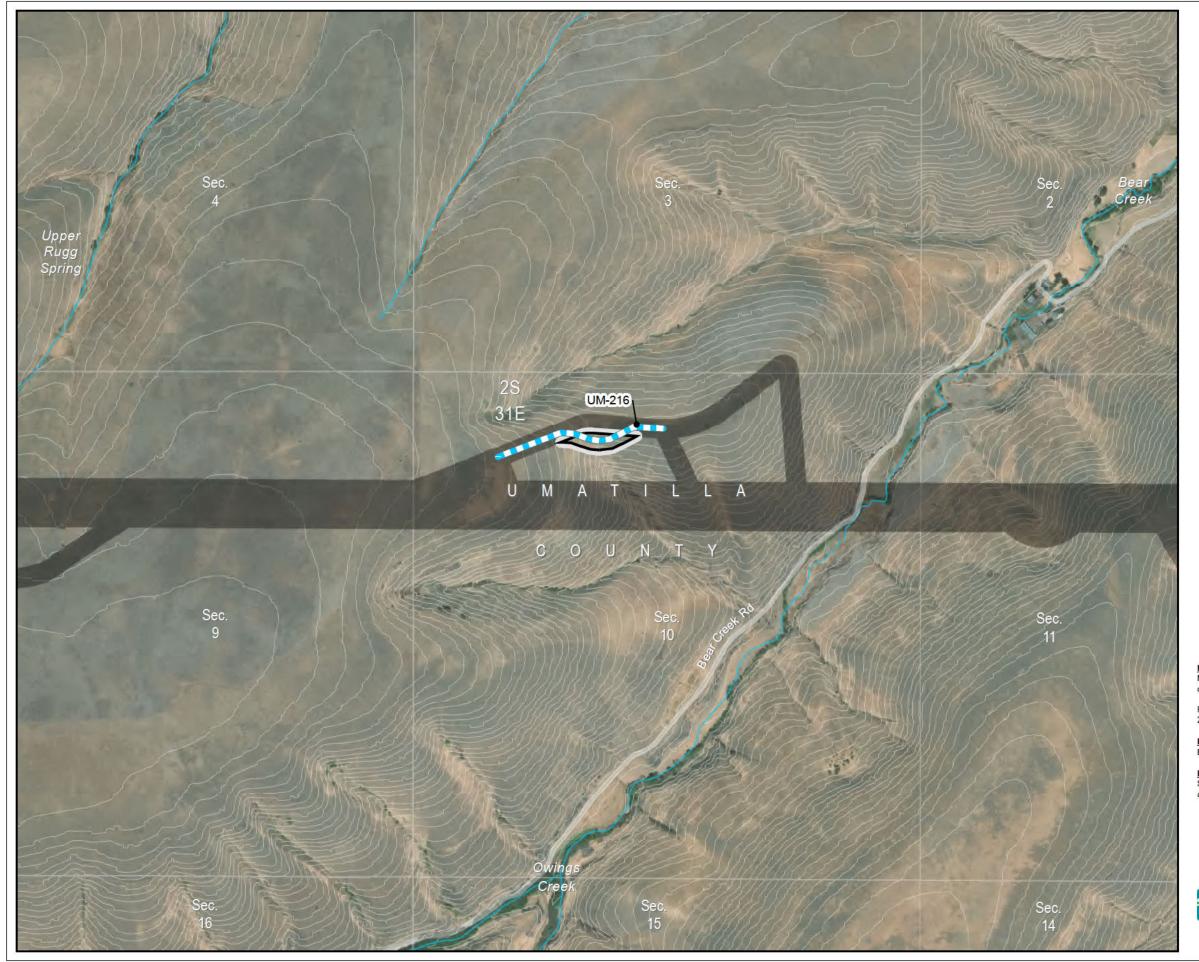
Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Umatilla County** 

## Map 6

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

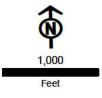
Public Roads

Land Status

Private

Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Umatilla County** 

Map 7

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

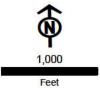
Public Roads

Land Status

Private

Project features current as of October 28, 2022.

Data Source(s):
BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Umatilla County** 

## Map 8

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

Land Status

Private

Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

Imagery: Source: Esri, Maxar, Earthstar Geographics,



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# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Umatilla County** 

Map 9

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

Land Status

Private

Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

Imagery: Source: Esri, Maxar, Earthstar Geographics,



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# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Umatilla County** 

## Map 10

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

Existing Road, Substantial Modification, 21-70%

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

Land Status

Private

Not intended for construction or any uses

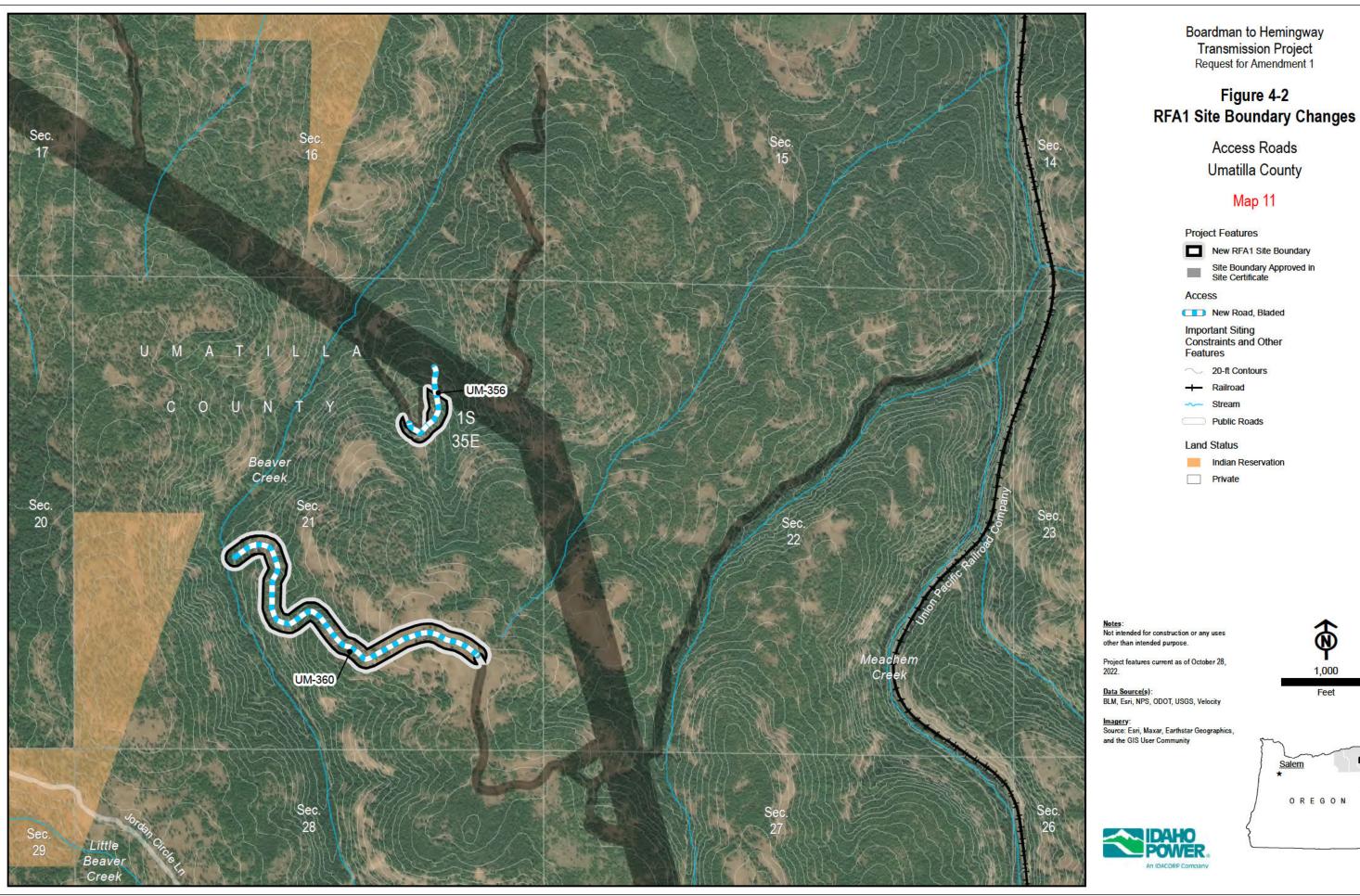
Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

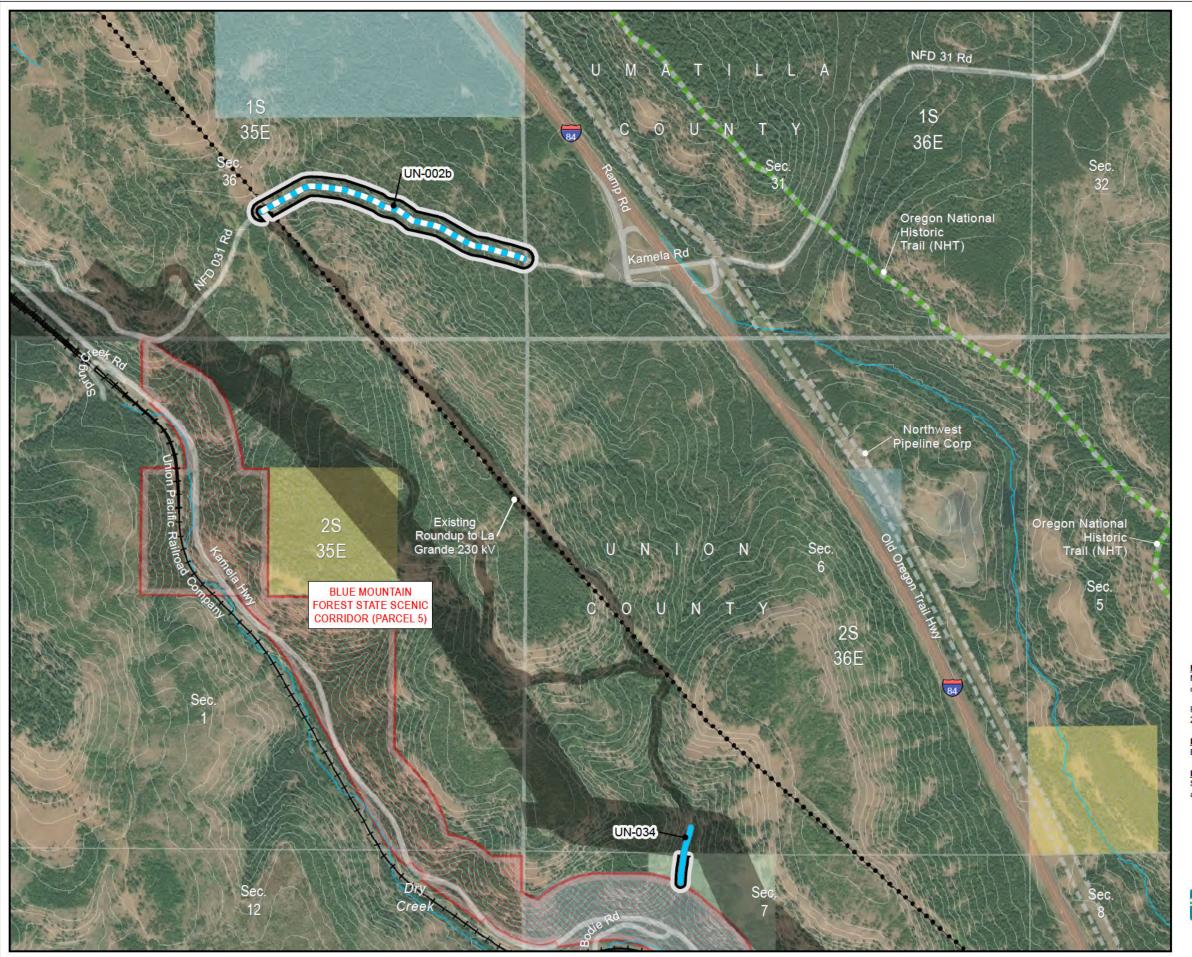








Map Area



# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Union County** 

## Map 12

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

Existing Road, Substantial Modification, 71-100%

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

● Existing Transmission Line

Railroad

Oregon National Historic

Public Roads

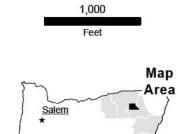
Protected Area (EFSC)

Notes: Not intended for construction or any uses

Project features current as of October 28, 2022.

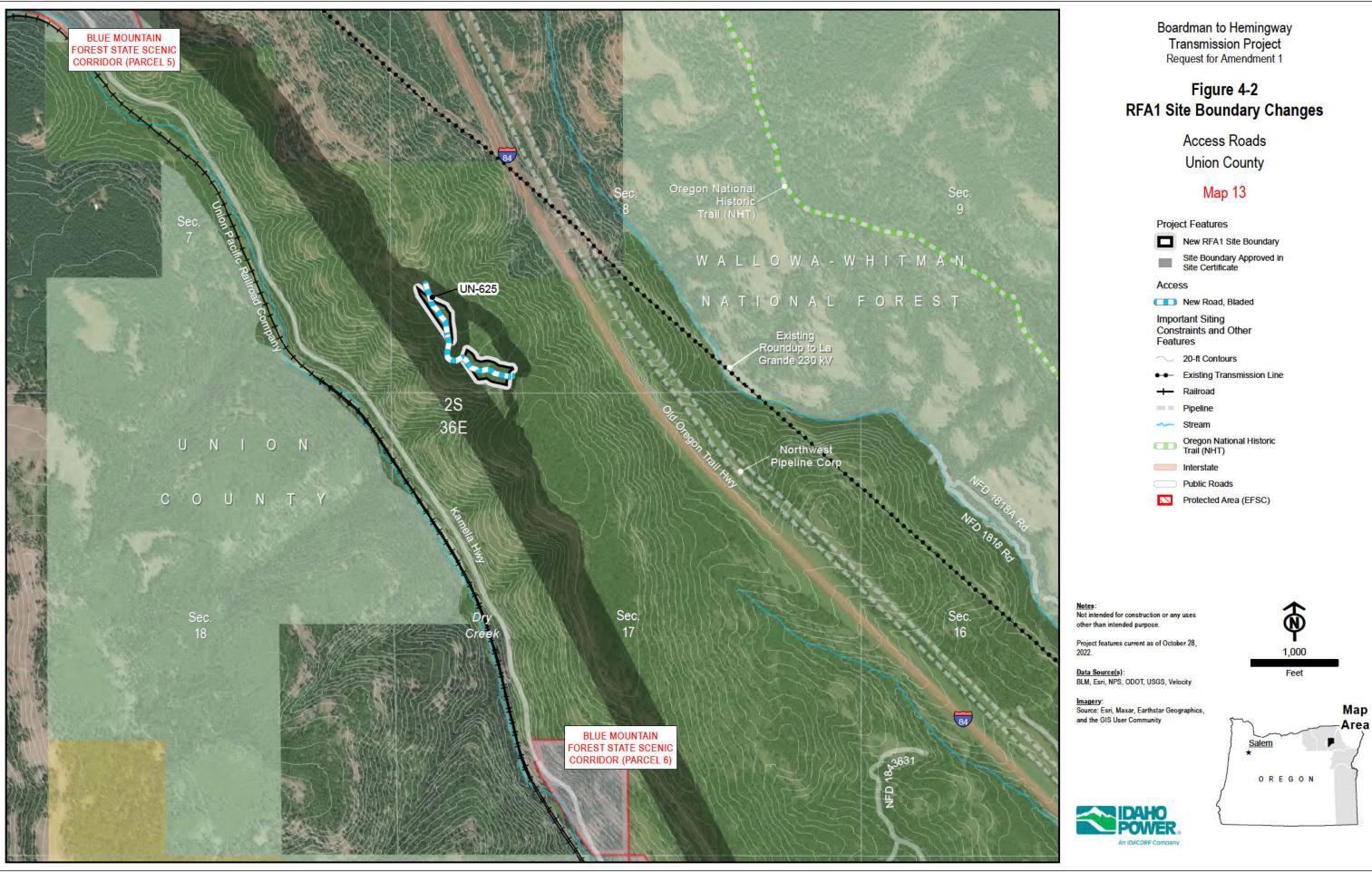
Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

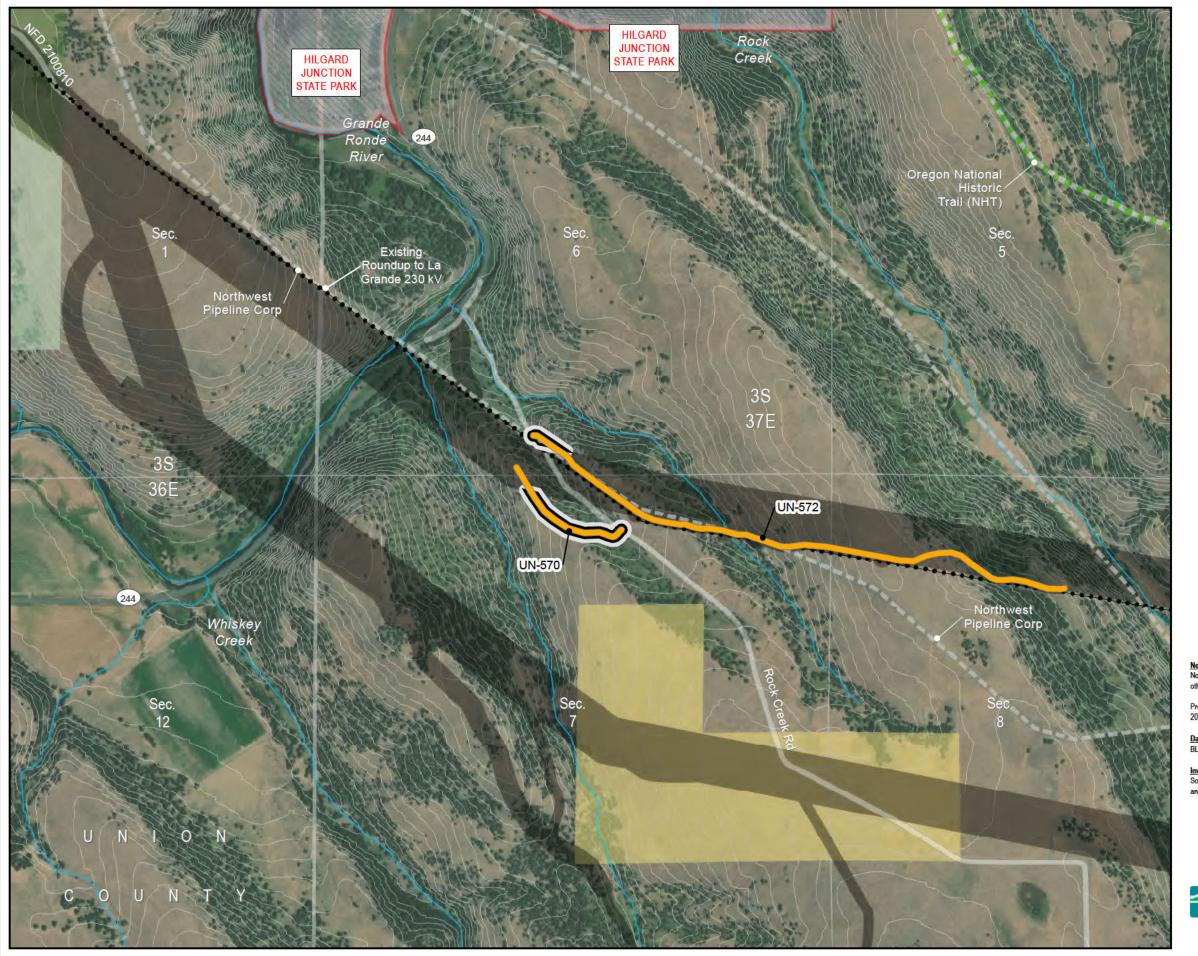
<u>Imagery</u>: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



OREGON







# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Union County** 

## Map 14

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

Existing Road, Substantial Modification, 21-70%

Important Siting Constraints and Other Features

20-ft Contours

**Existing Transmission Line** 

Pipeline

Oregon National Historic Trail (NHT)

Public Roads

Protected Area (EFSC)

Notes: Not intended for construction or any uses

Project features current as of October 28,

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Union County** 

## Map 15

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

**Public Roads** 

Morgan Lake Park

Land Status

Private

Not intended for construction or any uses

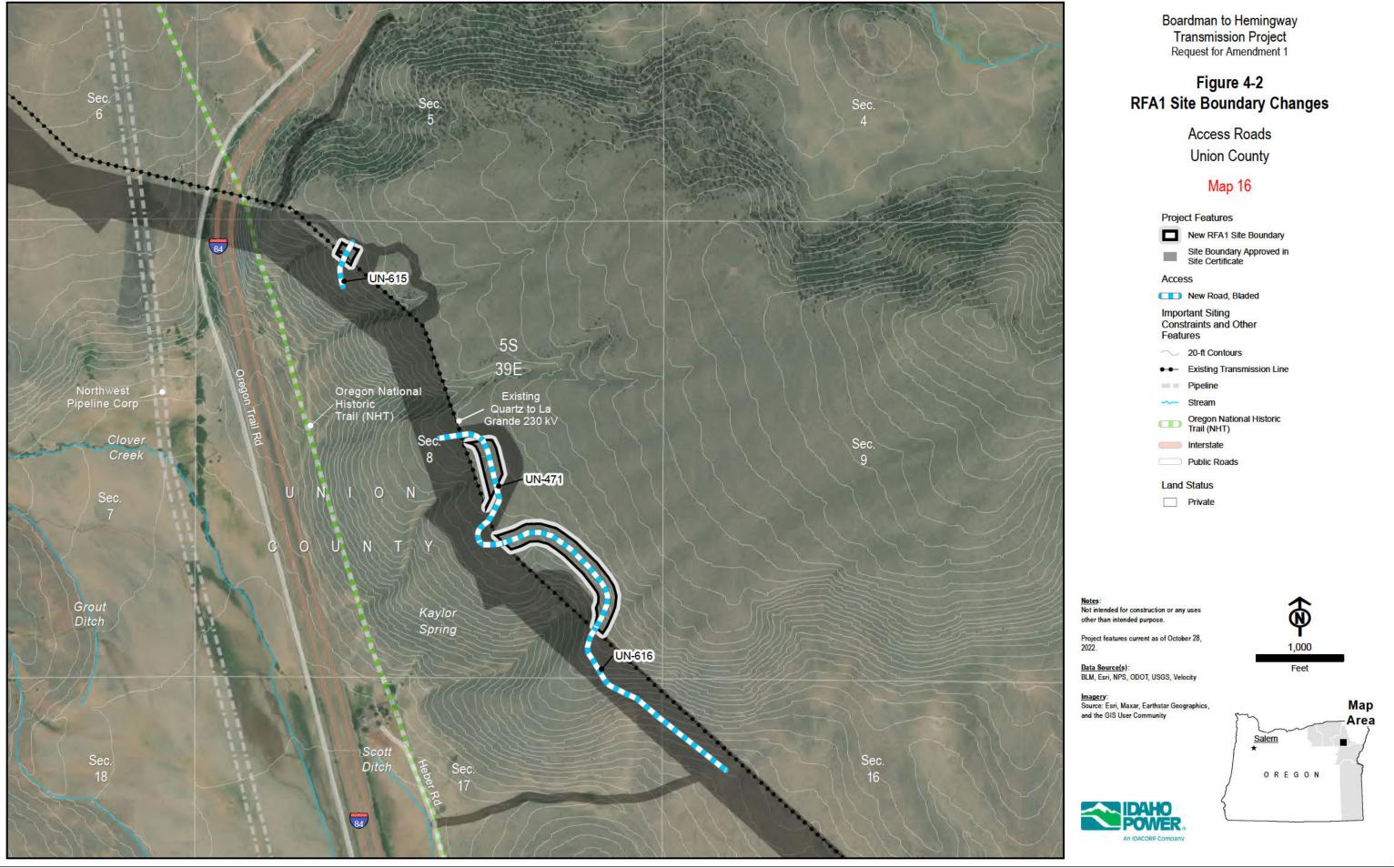
Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity











# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Union County** 

## Map 17

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

● Existing Transmission Line

Public Roads

Land Status

Private

Not intended for construction or any uses

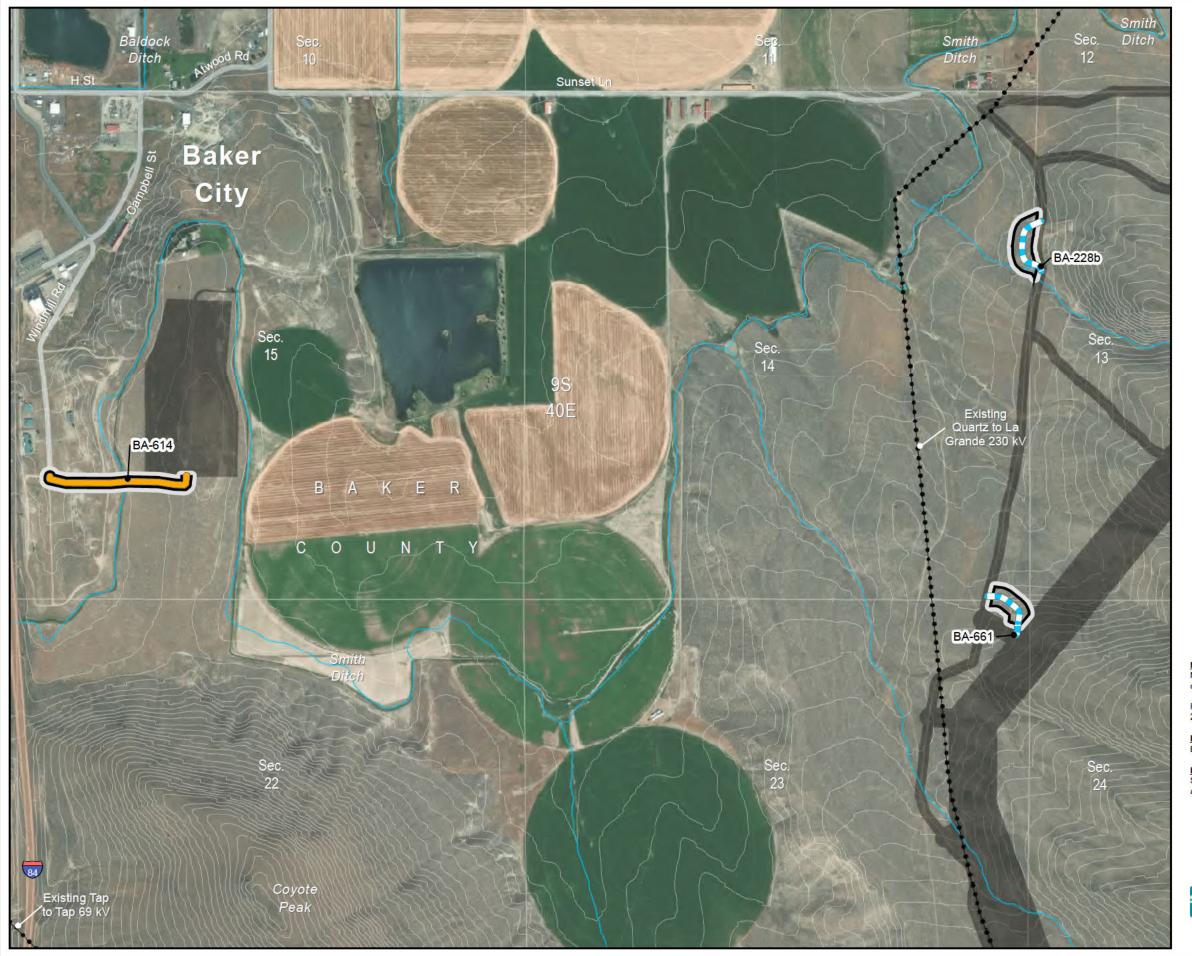
Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Baker County** 

## Map 18

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

Existing Road, Substantial Modification, 21-70%

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

● Existing Transmission Line

Interstate

Public Roads

Land Status

Private

Not intended for construction or any uses

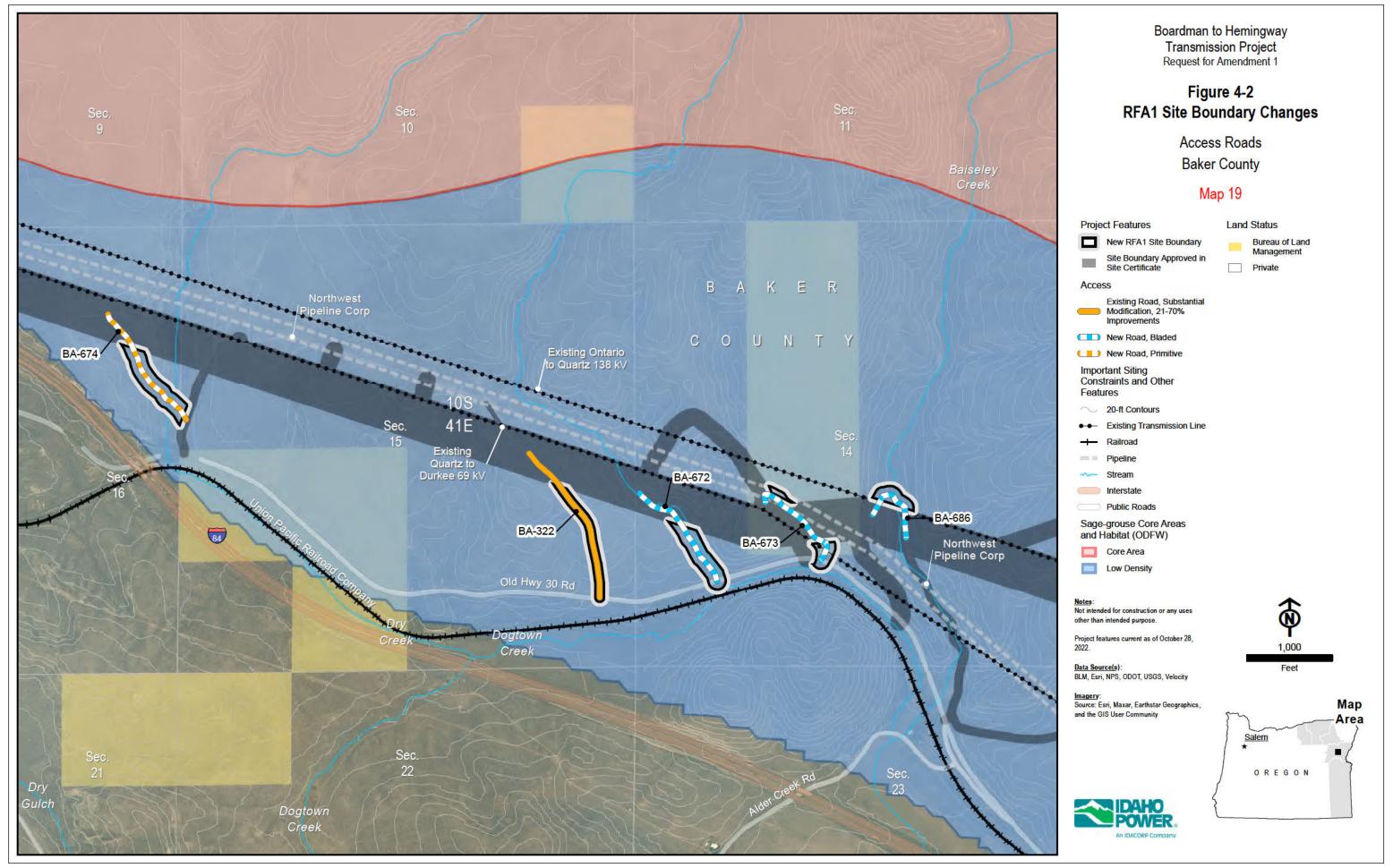
Project features current as of October 28, 2022.

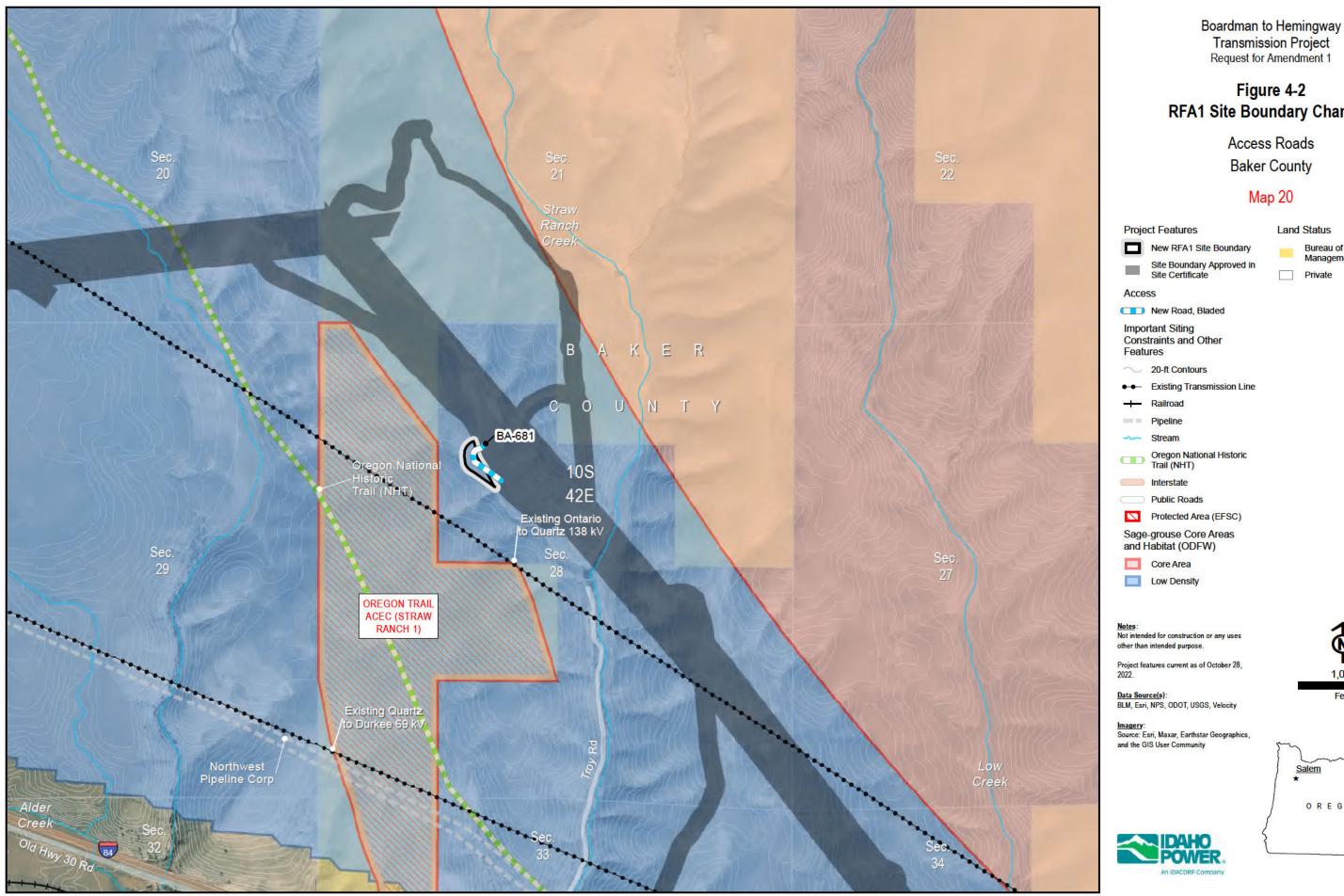
Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity







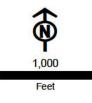




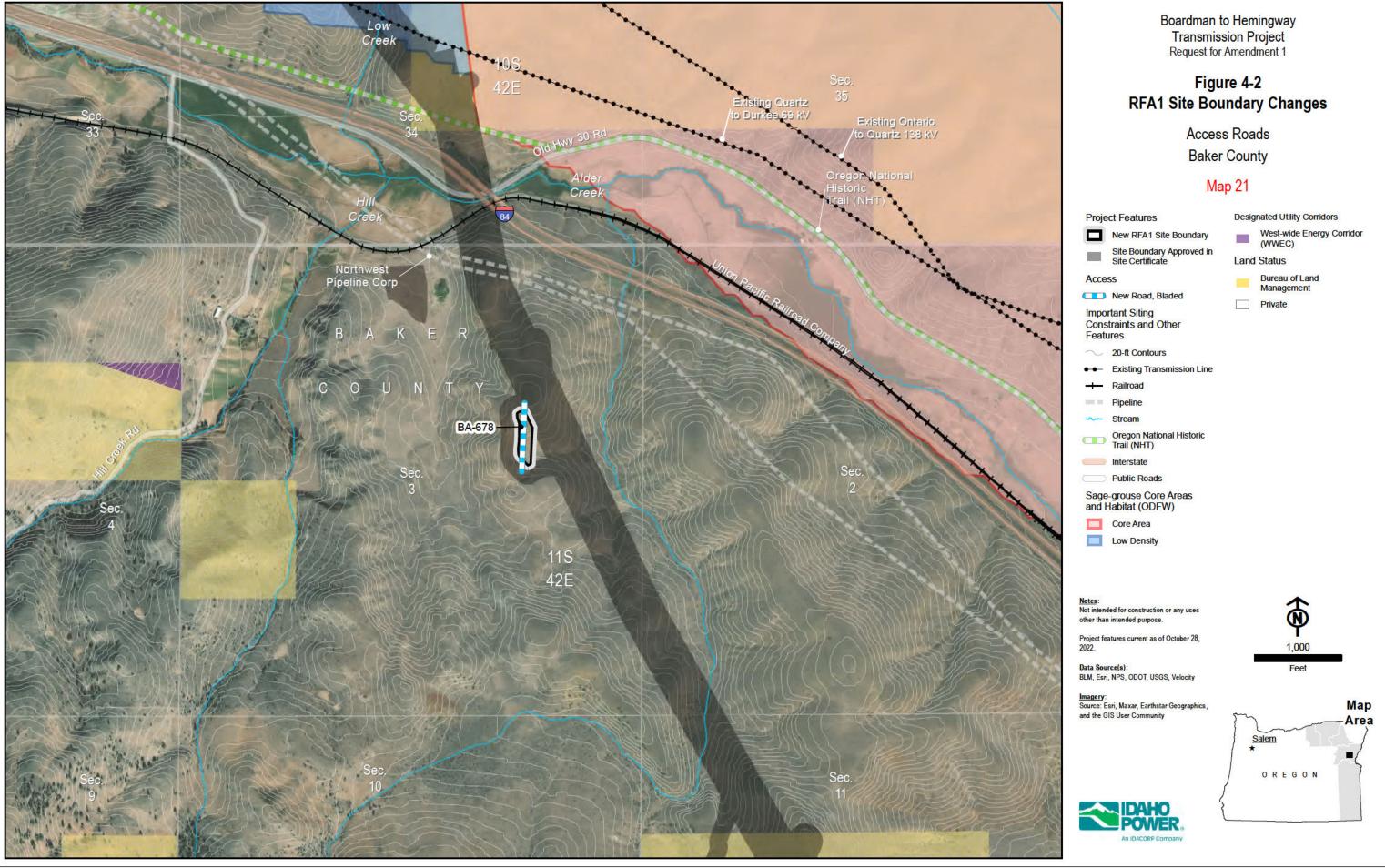
Access Roads **Baker County** 

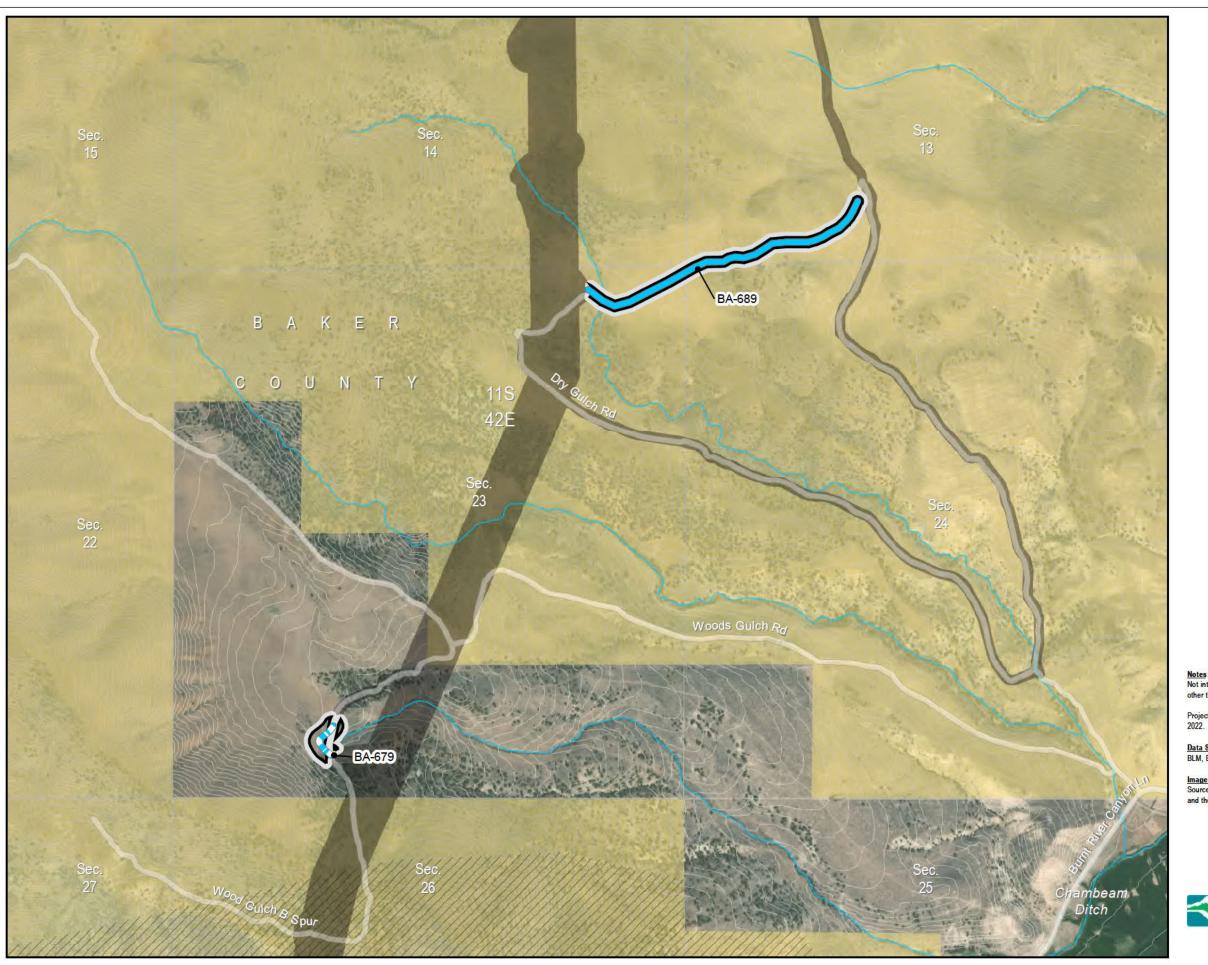
## Map 20

Land Status Bureau of Land Private









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Baker County** 

Map 22

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

Existing Road, Substantial Modification, 71-100%

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

// VRM Class 2

Land Status

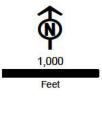
Bureau of Land Management

Private

Notes: Not intended for construction or any uses

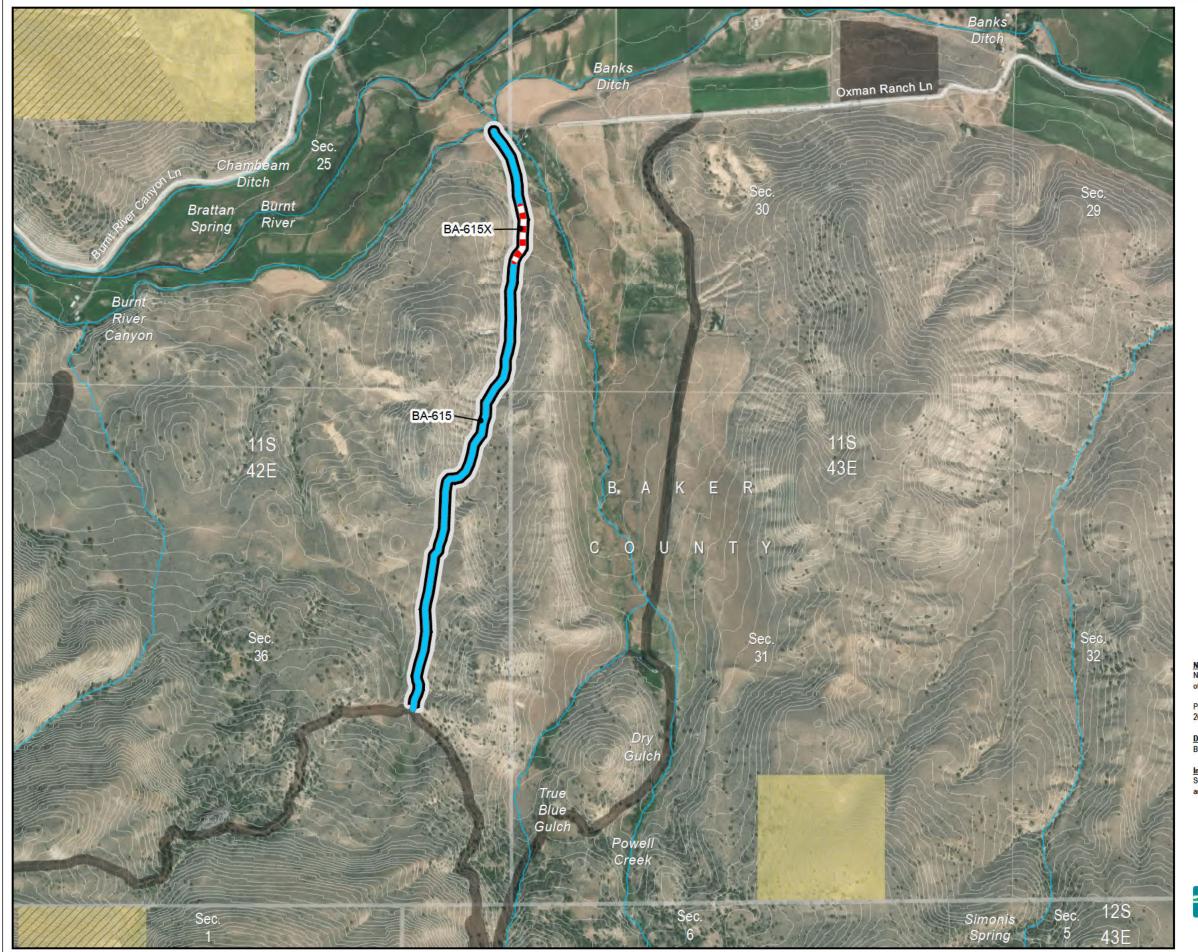
Project features current as of October 28,

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Baker County** 

## Map 23

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

Existing Road, No Improvements Permitted

Existing Road, Substantial Modification, 71-100% Improvements

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

// VRM Class 2 Land Status

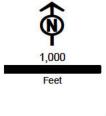
Bureau of Land

Management

Private

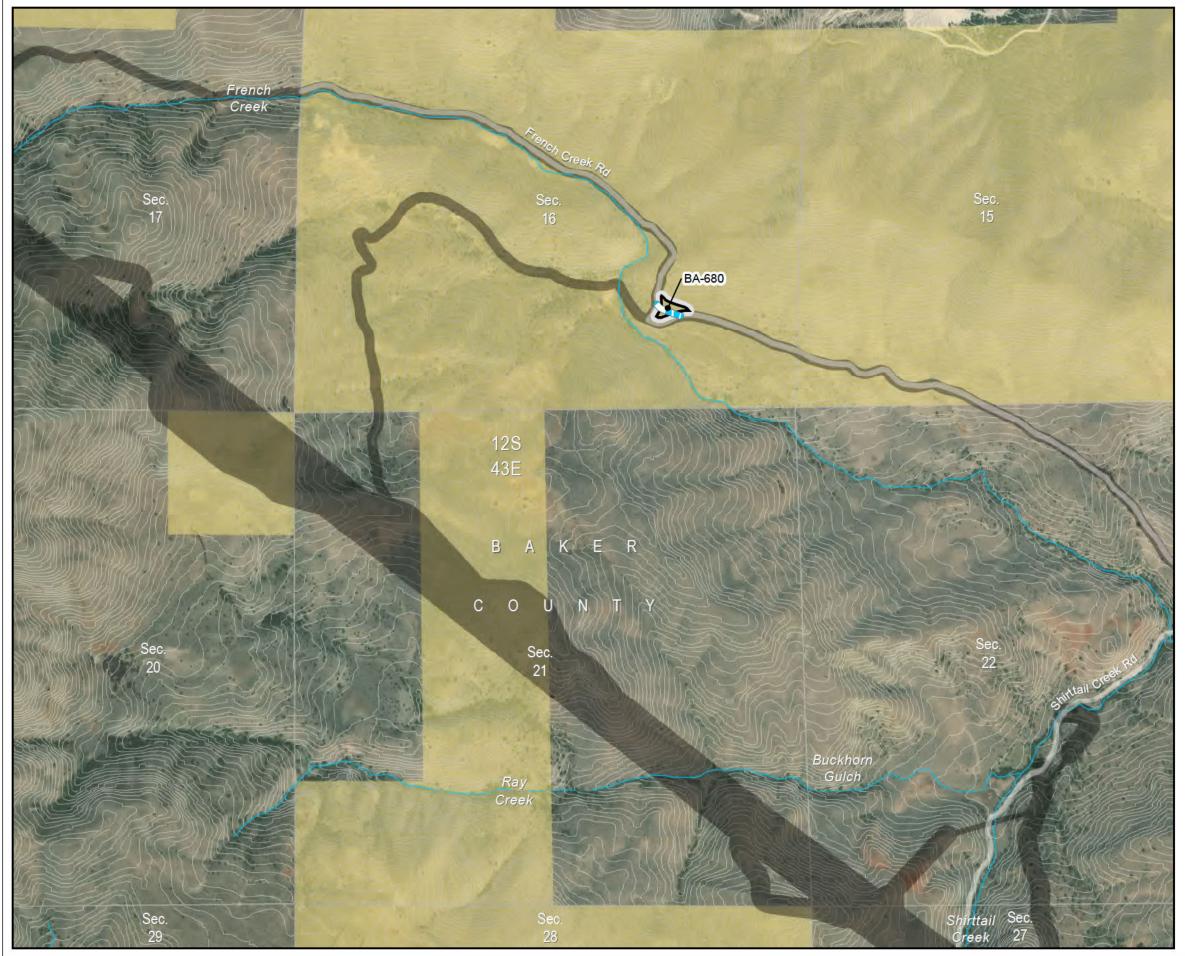
Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Baker County** 

Map 24

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

Land Status

Bureau of Land Management

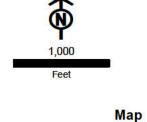
Private

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

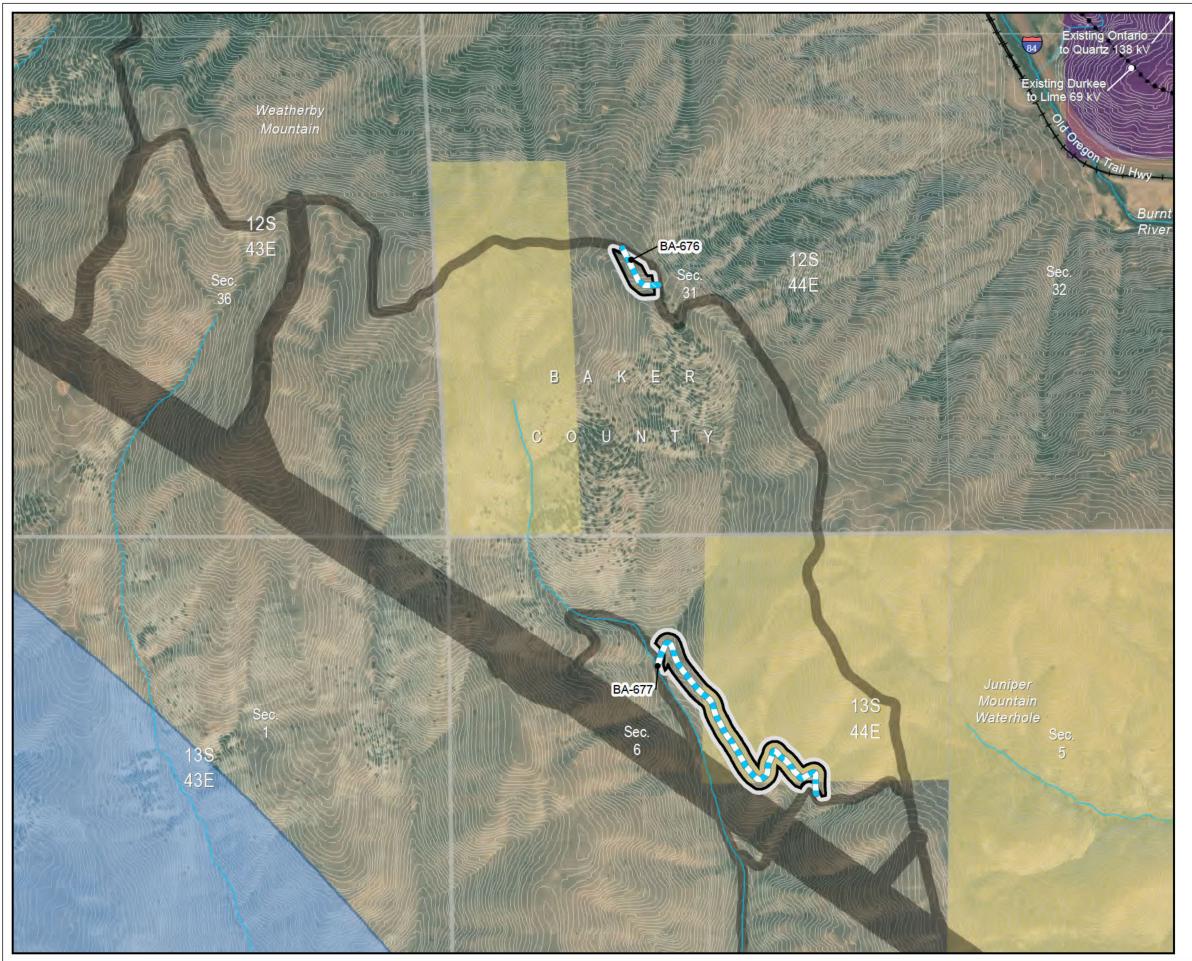
Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Area







# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads **Baker County** 

## Map 25

Bureau of Land

**Project Features** Land Status New RFA1 Site Boundary Site Boundary Approved in Site Certificate Private Access New Road, Bladed Important Siting Constraints and Other Features 20-ft Contours **Existing Transmission Line** Public Roads Sage-grouse Core Areas and Habitat (ODFW)

Not intended for construction or any uses

Low Density Designated Utility Corridors

West-wide Energy Corridor (WWEC)

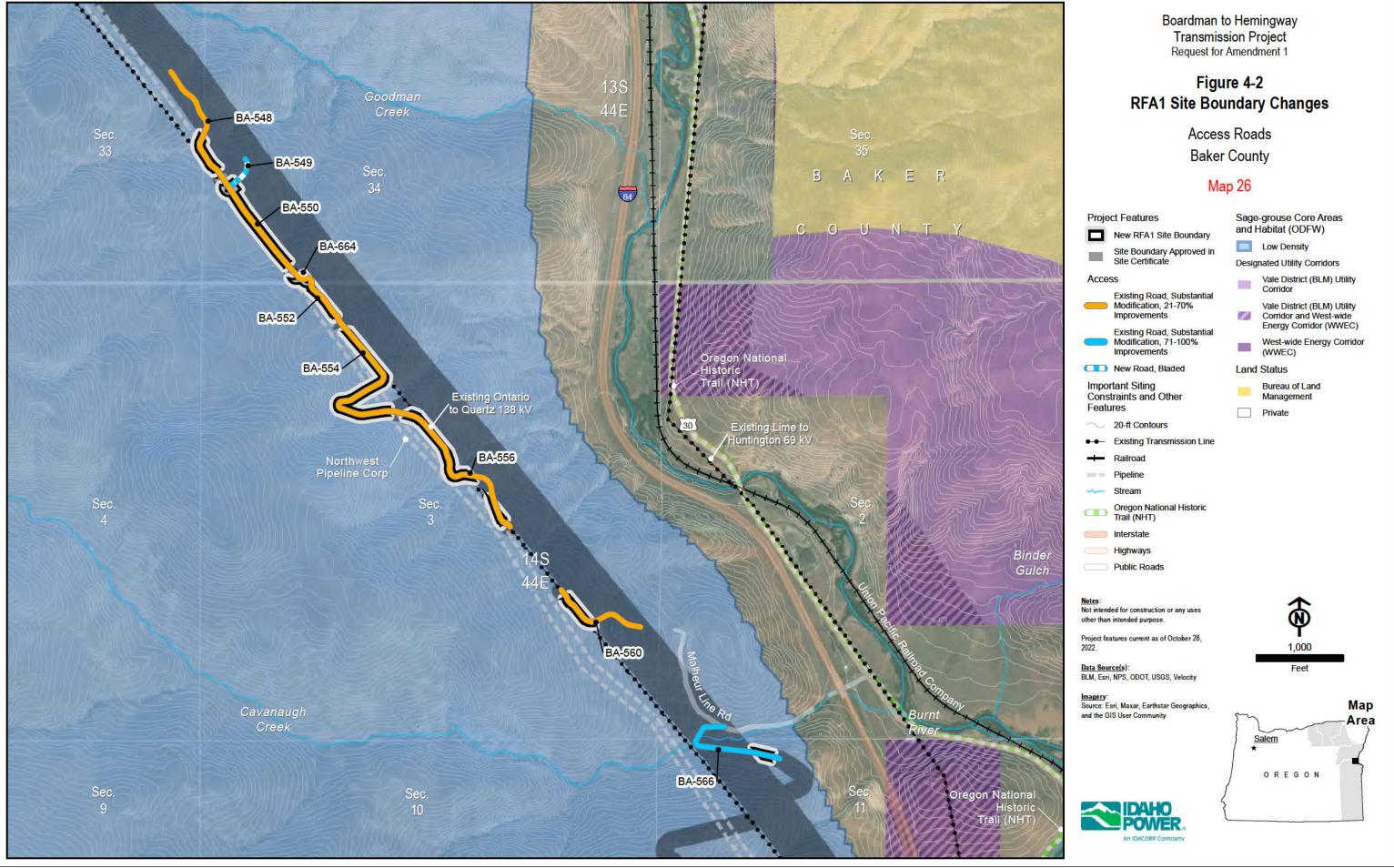
Project features current as of October 28, 2022.

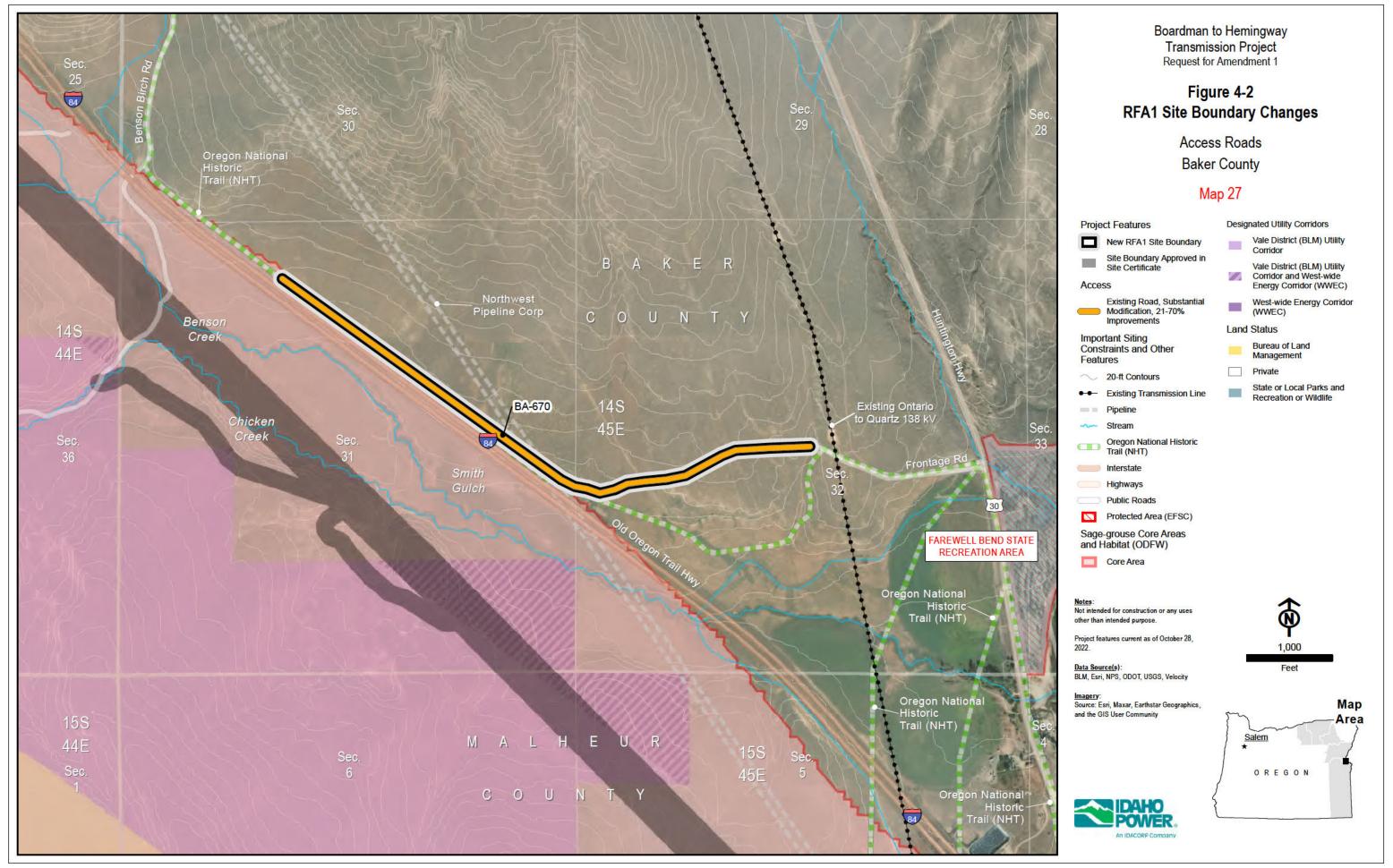
# Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

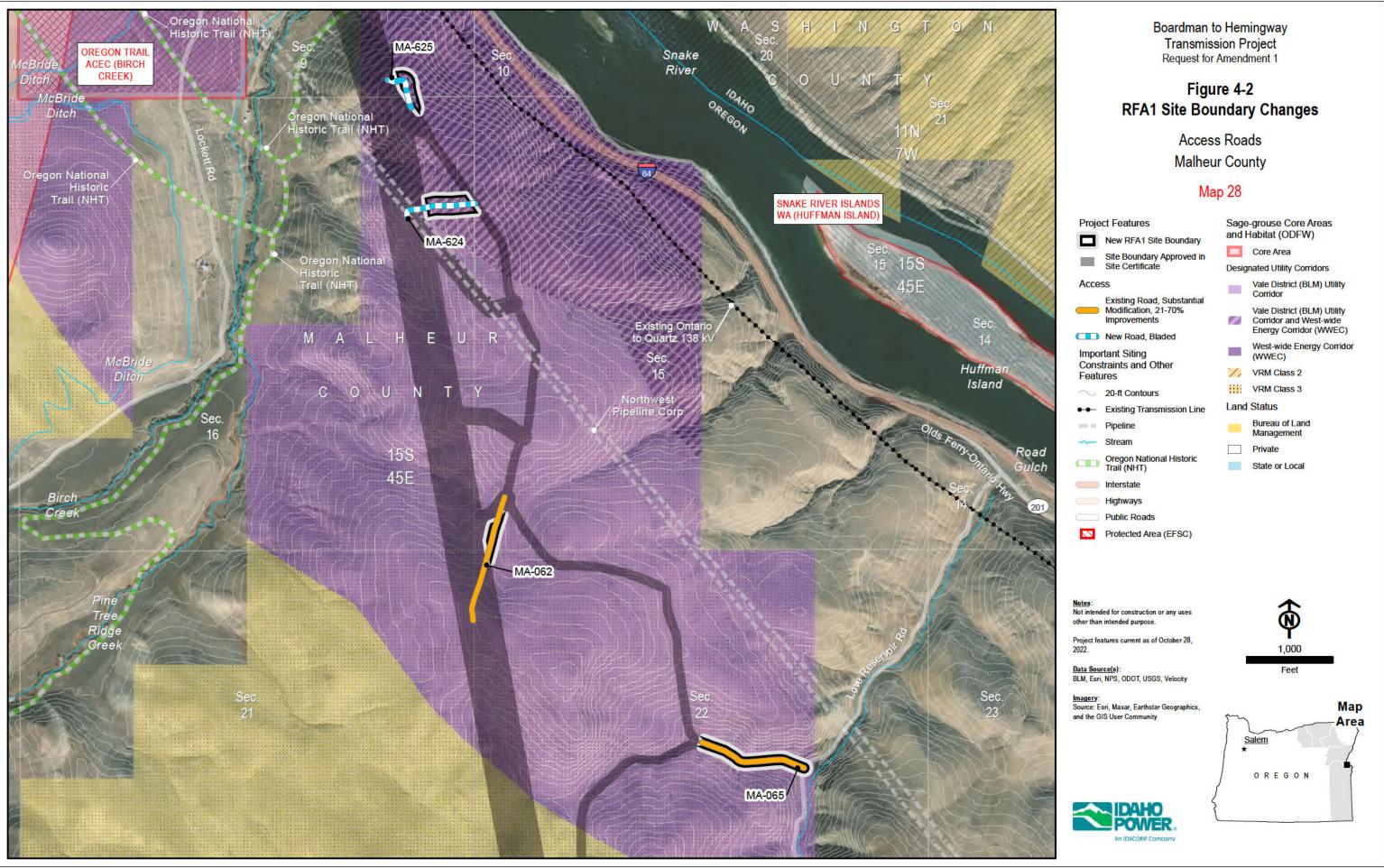


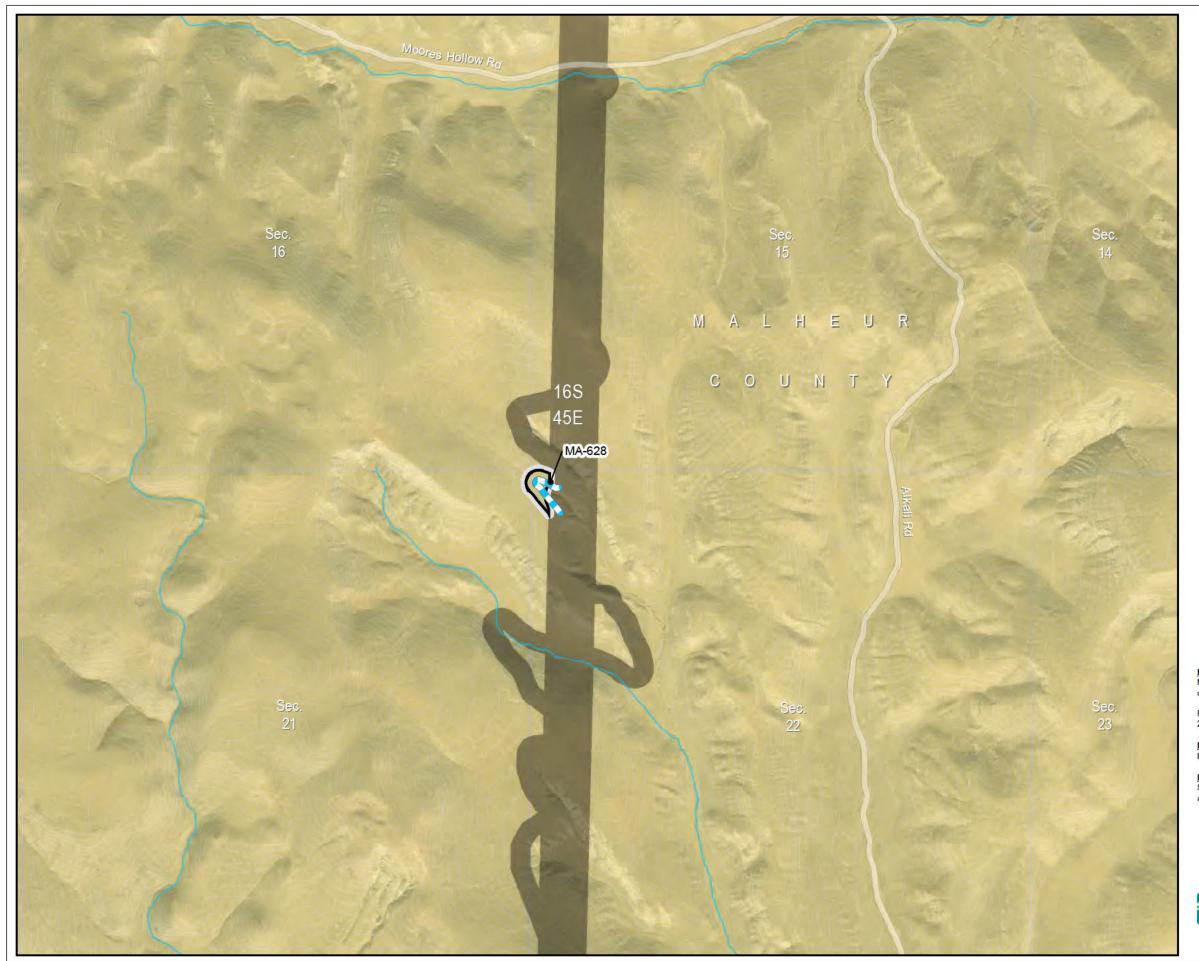












# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Malheur County

Map 29

### Project Features

New RFA1 Site Boundary



### Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

### Land Status

Bureau of Land Management

Not intended for construction or any uses

Project features current as of October 28, 2022.

# Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

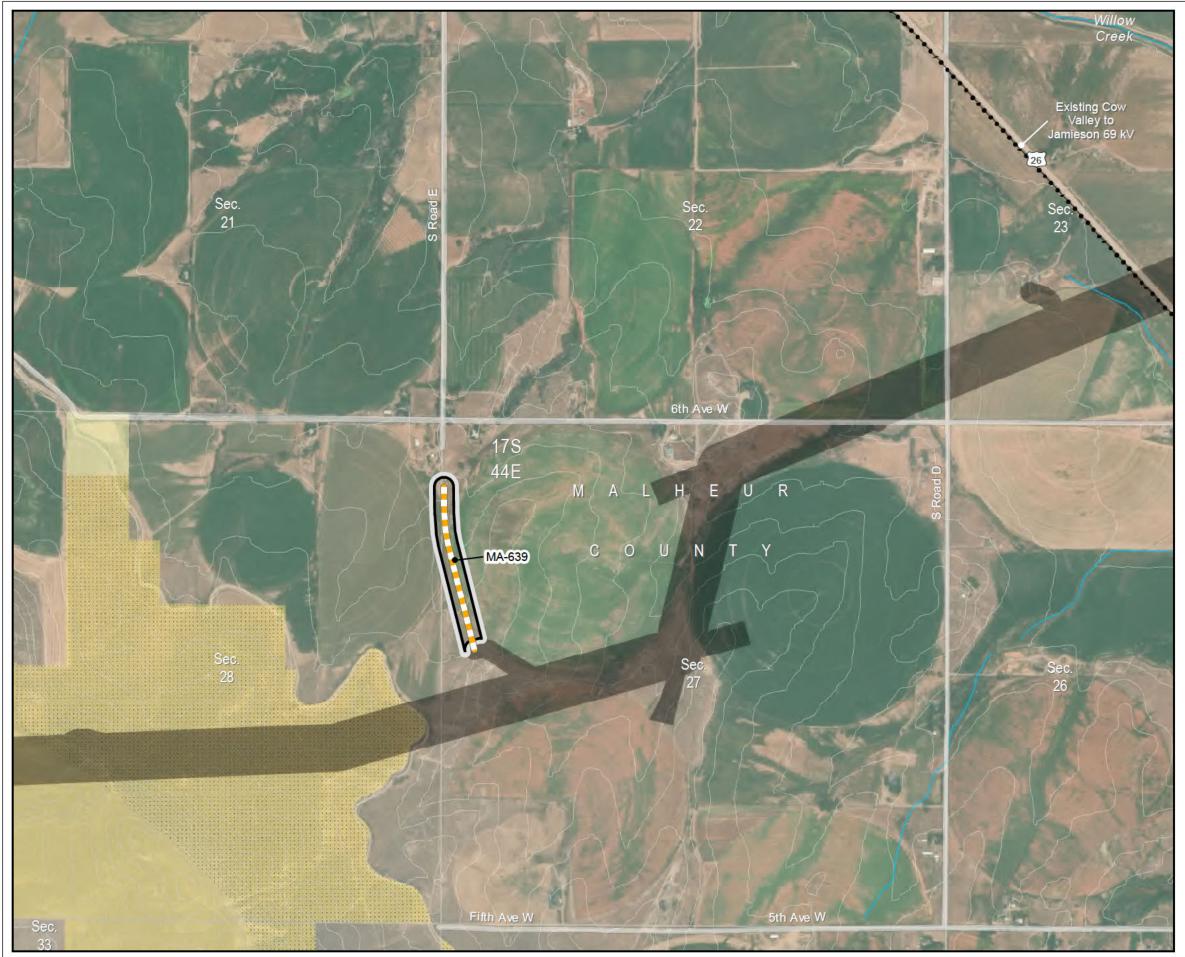
Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



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Feet





# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Malheur County

Map 30

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Primitive

Important Siting Constraints and Other Features

20-ft Contours

● Existing Transmission Line

Highways Public Roads

VRM Class 3

Land Status

Bureau of Land Management

Bureau of Reclamation

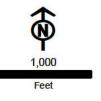
Private

Not intended for construction or any uses

Project features current as of October 28, 2022.

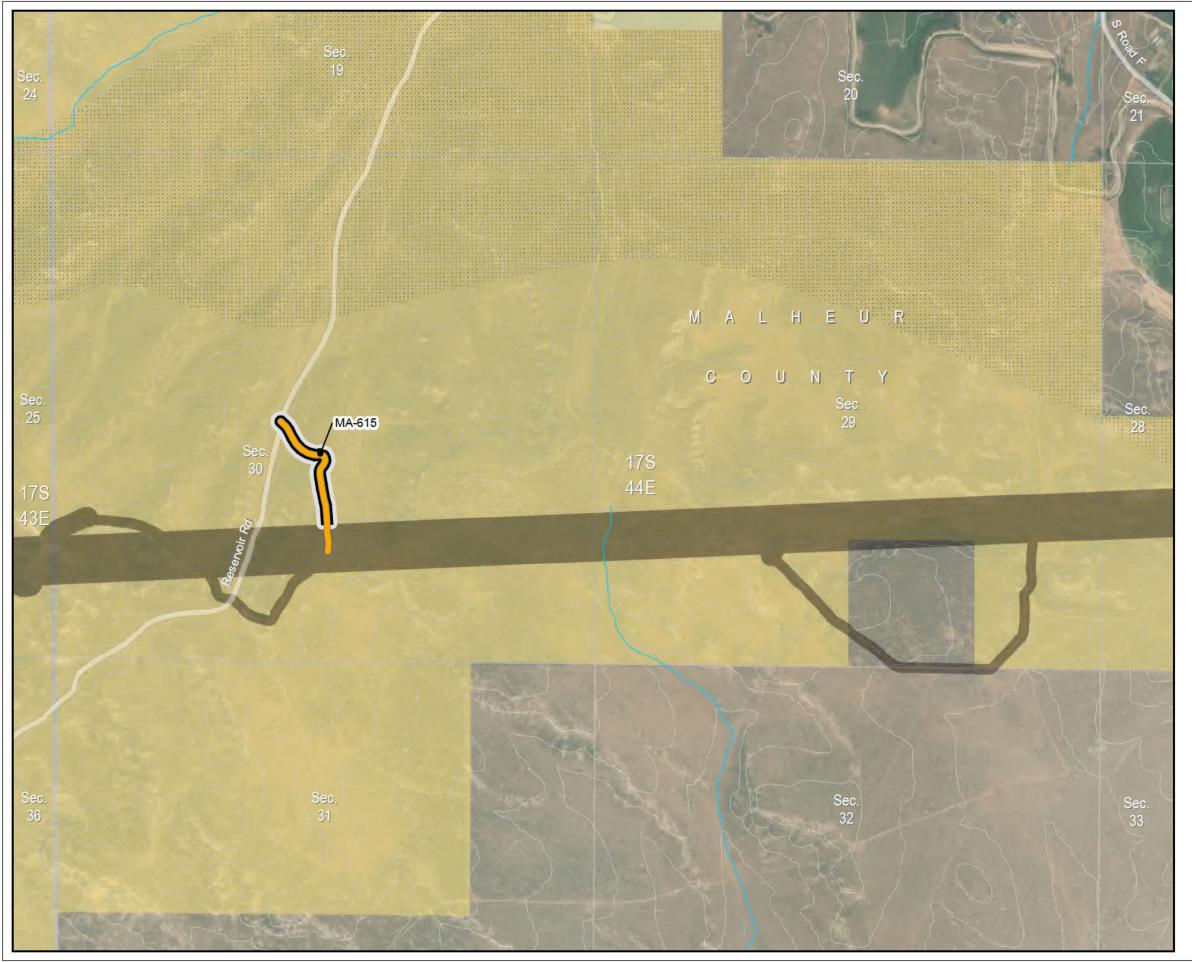
Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Malheur County

### Map 31

### Project Features

New RFA1 Site Boundary



### Access

Existing Road, Substantial Modification, 21-70% Improvements

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

VRM Class 3

Land Status

Bureau of Land Management

**Bureau of Reclamation** 

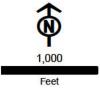
Private

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Malheur County

Map 32

### Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

### Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

Stream

Public Roads

VRM Class 3

Land Status

Bureau of Land Management

**Bureau of Reclamation** 

Private

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

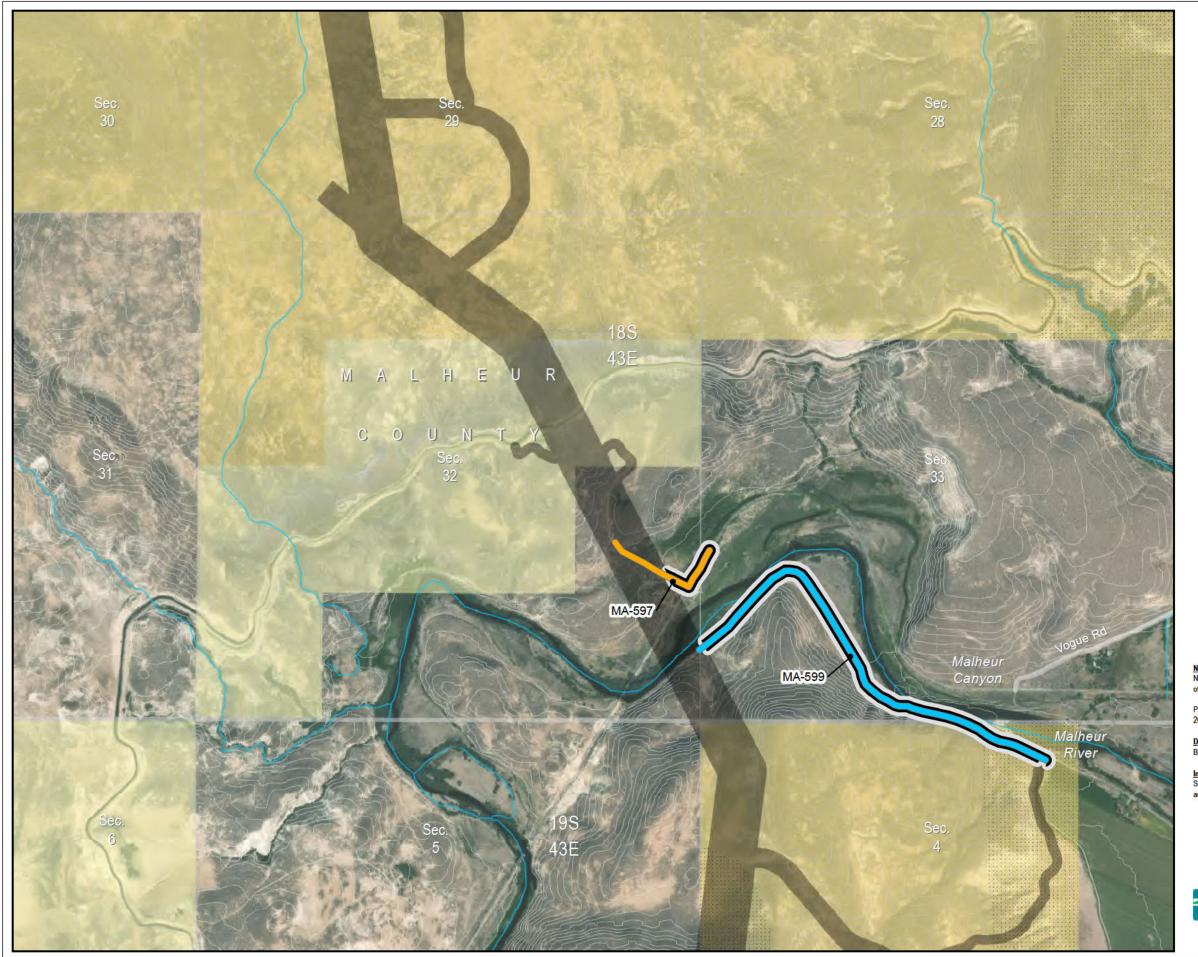
Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Map

Area





# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Malheur County

Map 33

### Project Features

New RFA1 Site Boundary



### Access

Existing Road, Substantial Modification, 21-70%

Existing Road, Substantial

Modification, 71-100% Improvements

Important Siting Constraints and Other **Features** 

20-ft Contours

Public Roads

VRM Class 3

### Land Status

Bureau of Land Management

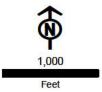
**Bureau of Reclamation** 

Private

Project features current as of October 28, 2022.

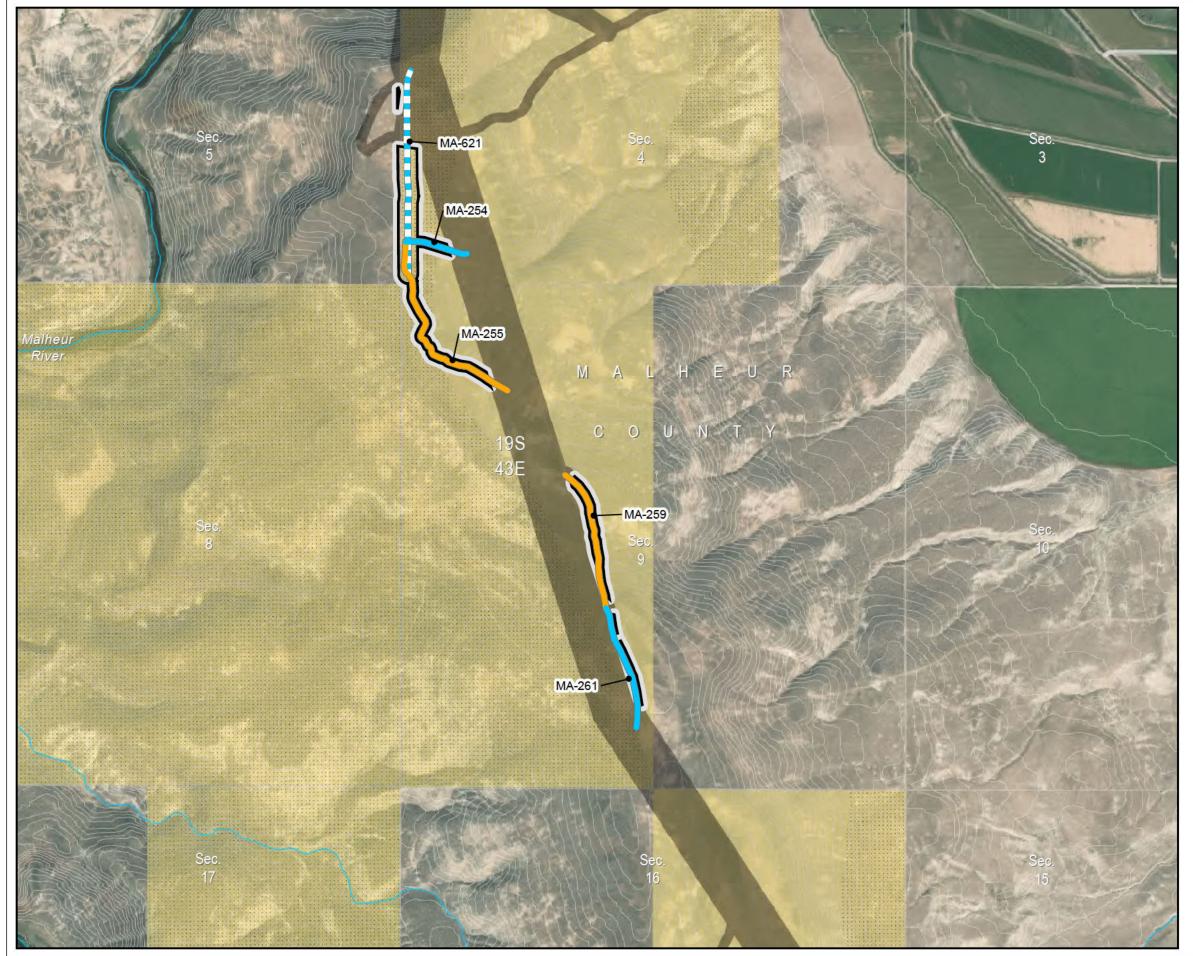
Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

<u>Imagery</u>: Source: Esri, Maxar, Earthstar Geographics,









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Malheur County

### Map 34

### Project Features

New RFA1 Site Boundary



### Access

Existing Road, Substantial Modification, 21-70%

Existing Road, Substantial
Modification, 71-100% Improvements

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

VRM Class 3

Land Status

Bureau of Land Management

Private

Not intended for construction or any uses

Project features current as of October 28, 2022.

# Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

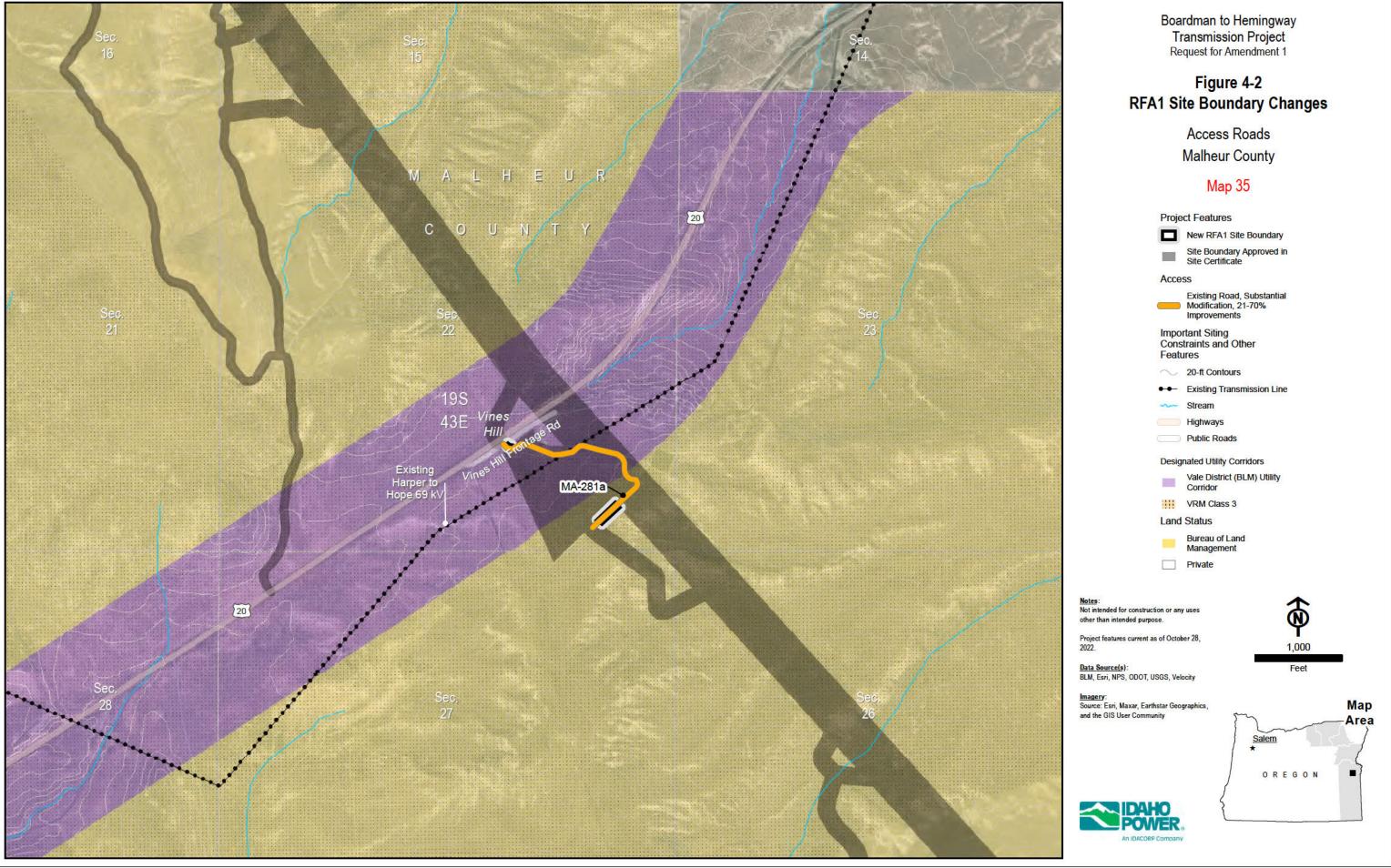
Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

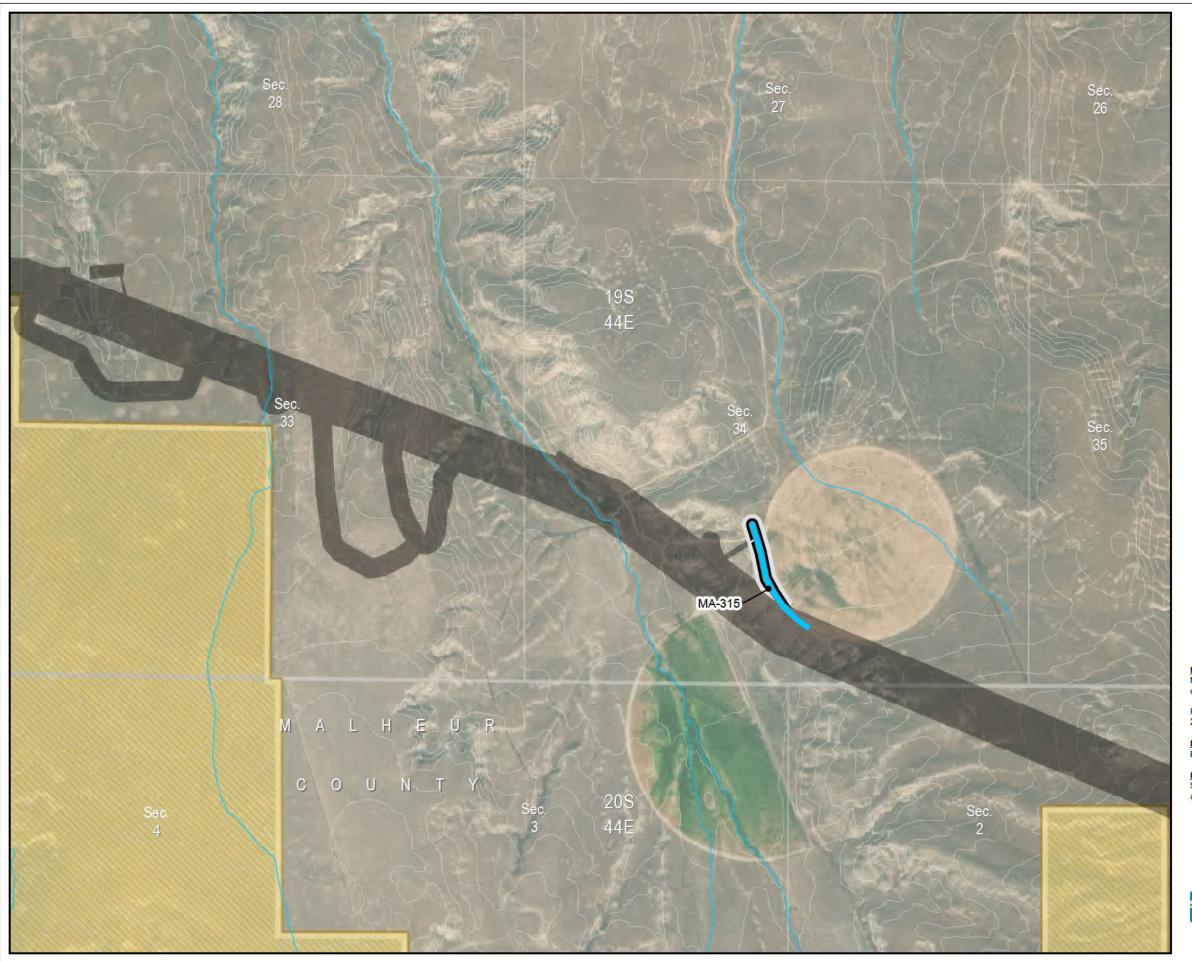


1,000

Feet







# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Malheur County

Map 36

### Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

### Access

Existing Road, Substantial Modification, 71-100%

Important Siting Constraints and Other Features

20-ft Contours

Wildemess Characteristic Unit Meeting Wildemess

Land Status

Bureau of Land Management

Private

Notes: Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s):
BLM, Esri, NPS, ODOT, USGS, Velocity

Imagery: Source: Esri, Maxar, Earthstar Geographics,







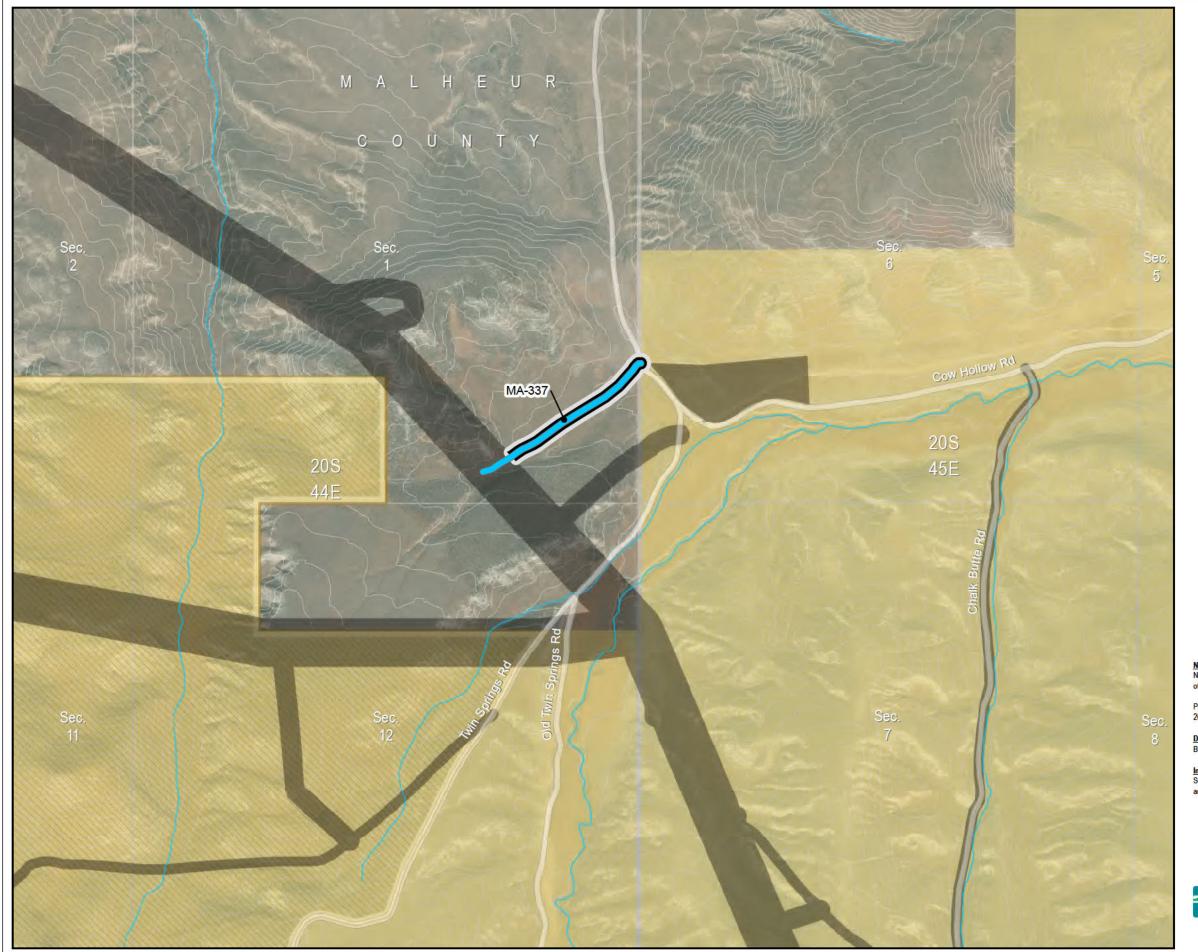


Figure 4-2

**RFA1 Site Boundary Changes** Access Roads

Map 37

Malheur County

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

Existing Road, Substantial Modification, 71-100%

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

Wildemess Characteristic
Unit Meeting Wildemess

Land Status

Bureau of Land Management

Private

Not intended for construction or any uses

Project features current as of October 28,

Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



1,000

Map

Area



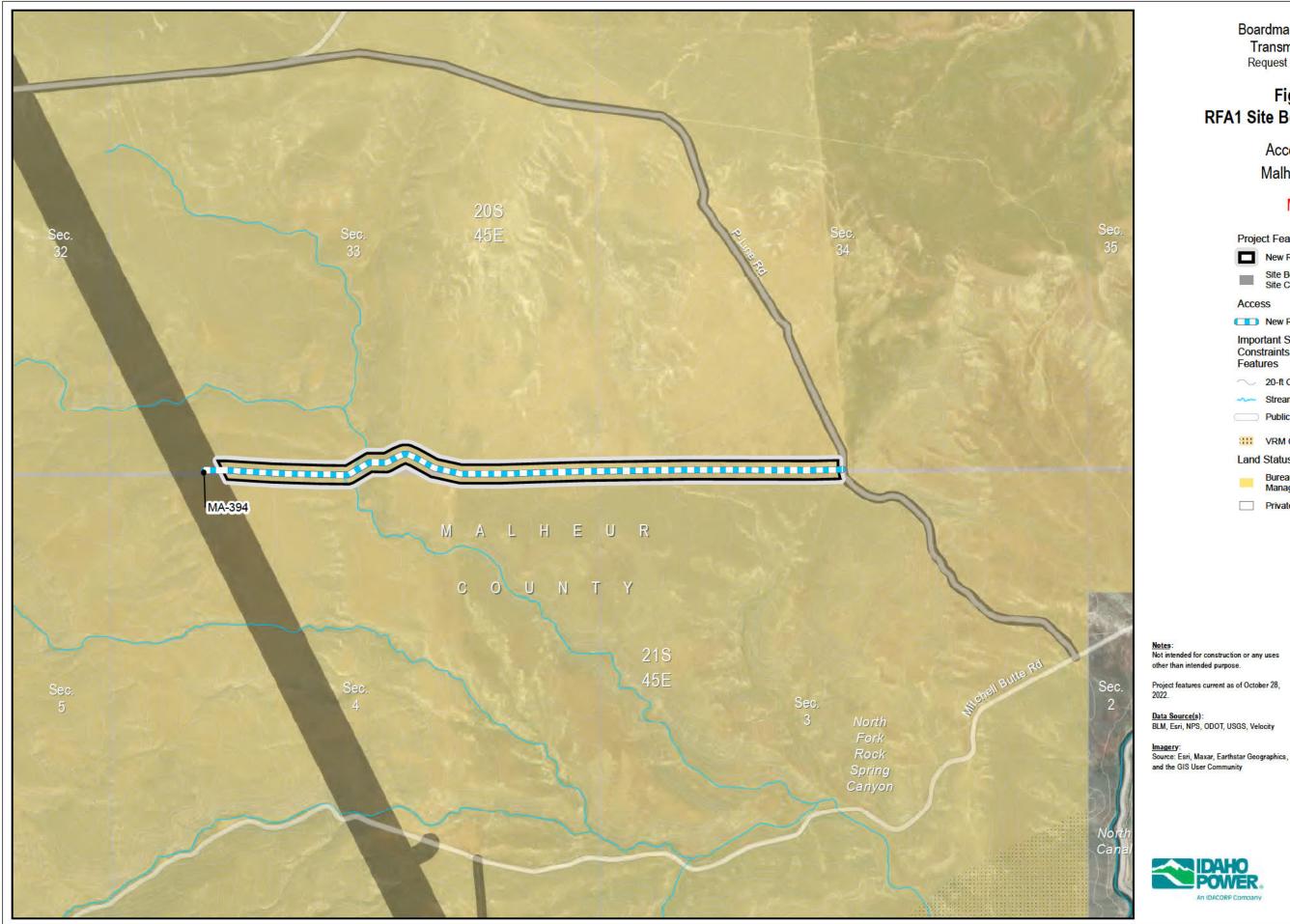


Figure 4-2

**RFA1 Site Boundary Changes** Access Roads

Map 38

Malheur County

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

Public Roads

VRM Class 3

Land Status

Bureau of Land Management

Private

Project features current as of October 28,

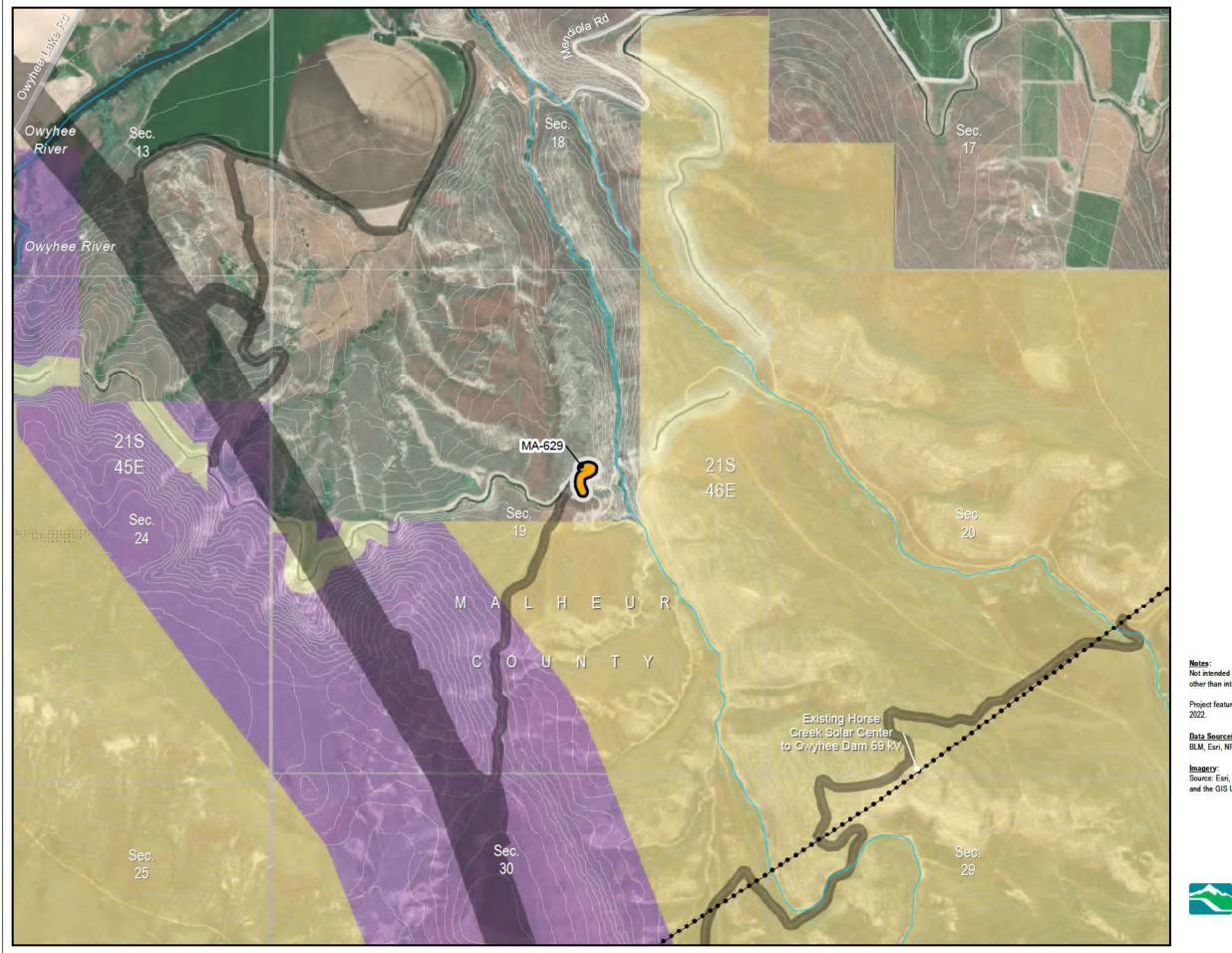
and the GIS User Community



1,000

Feet





# Figure 4-2 RFA1 Site Boundary Changes

Access Roads Malheur County

Map 39

### **Project Features**

New RFA1 Site Boundary



### Access

Existing Road, Substantial
Modification, 21-70%
Improvements

Important Siting Constraints and Other Features

20-ft Contours

● ● Existing Transmission Line

--- Stream

Public Roads

### Designated Utility Corridors

Vale District (BLM) Utility Corridor

VRM Class 3

### Land Status

Bureau of Land

Management

Bureau of Reclamation

Private

Notes: Not intended for construction or any uses other than intended purpose.

Project features current as of October 28, 2022.

### Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

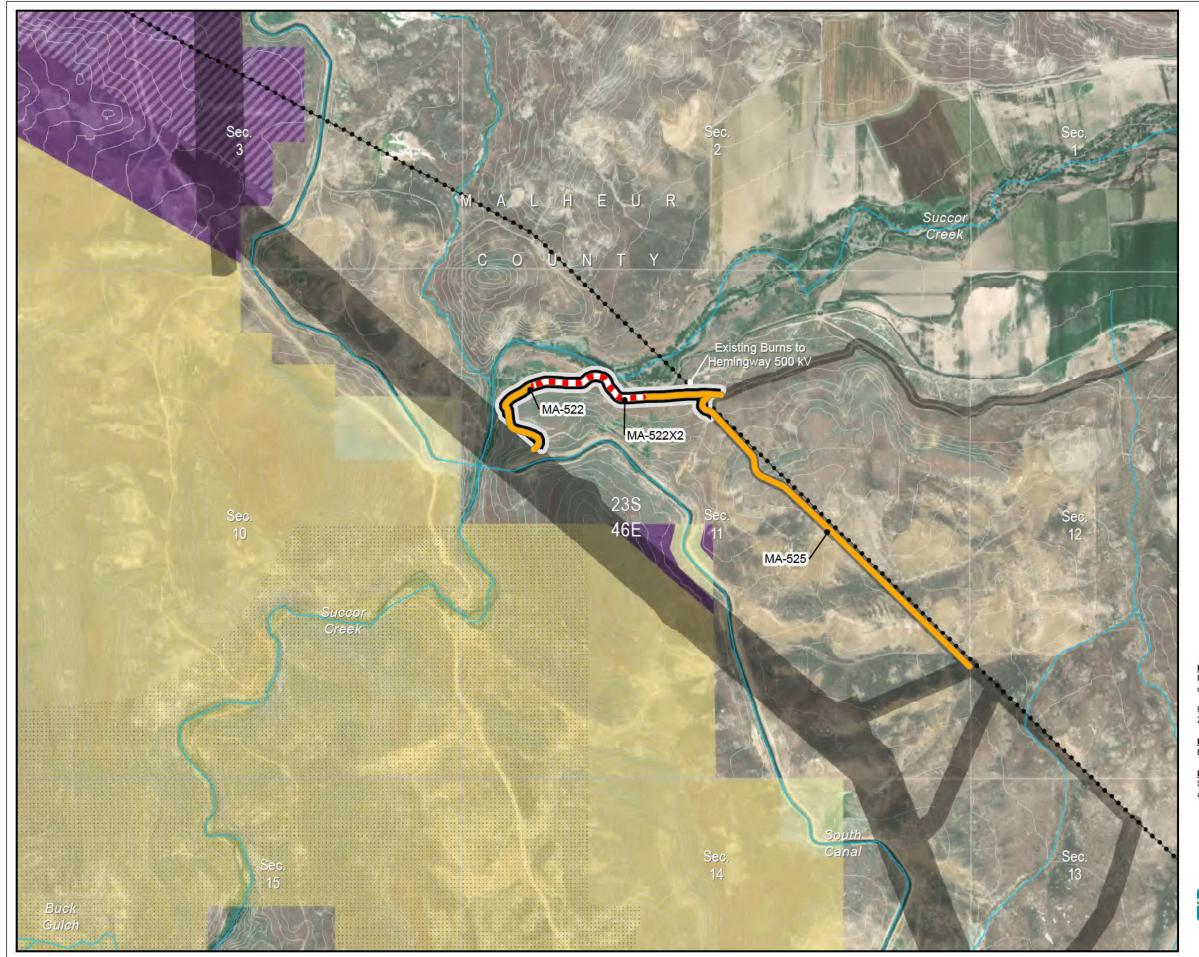
Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



1,000

Feet





# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Malheur County

### Map 40

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

Existing Road, No Improvements Permitted

Existing Road, Substantial
Modification, 21-70%
Improvements

Important Siting Constraints and Other Features

20-ft Contours

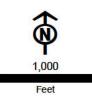
● Existing Transmission Line

Notes: Not intended for construction or any uses

Project features current as of October 28, 2022.

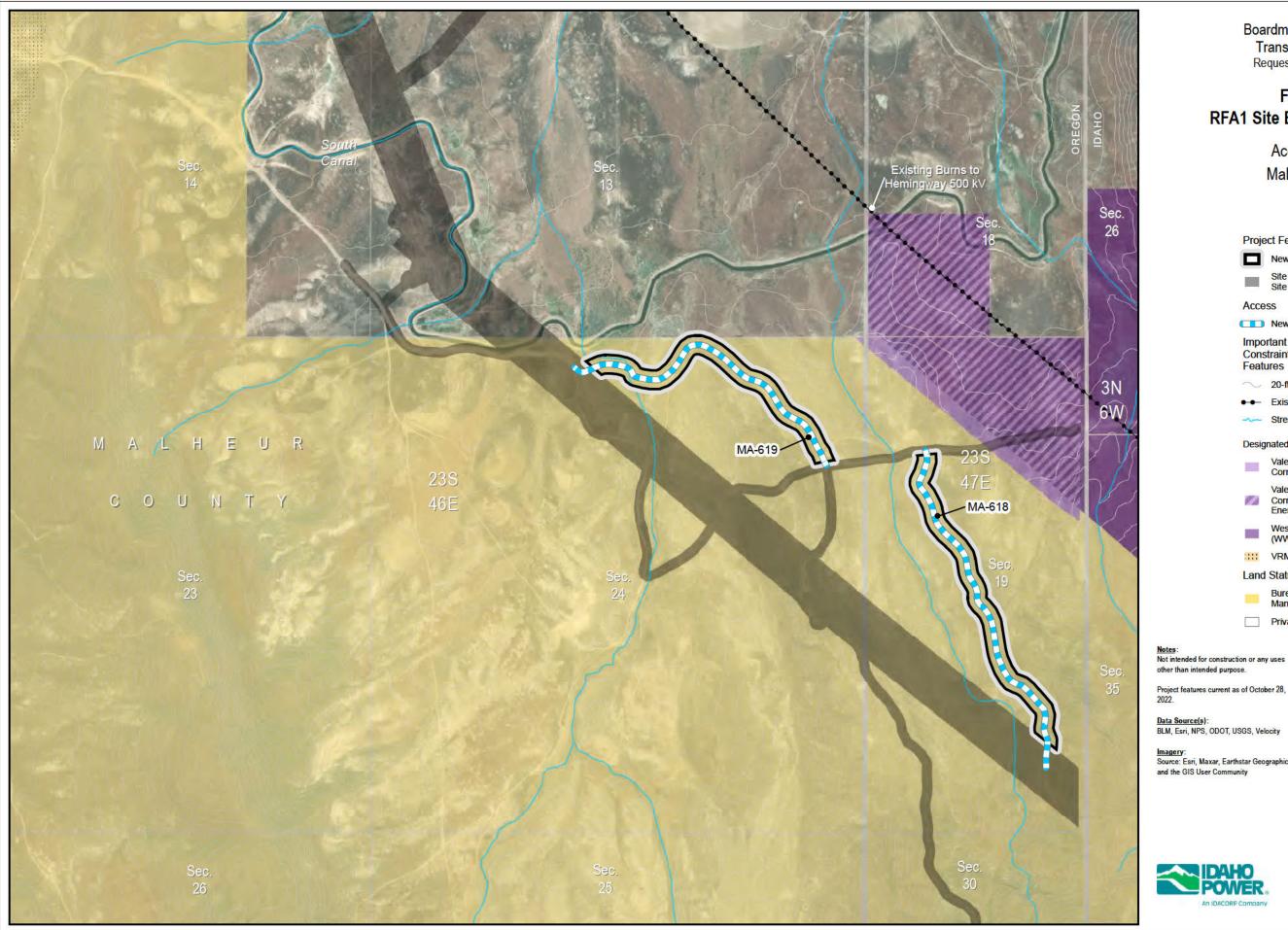
Data Source(s): BLM, Esri, NPS, ODOT, USGS, Velocity

Imagery: Source: Esri, Maxar, Earthstar Geographics,









# Figure 4-2 **RFA1 Site Boundary Changes**

Access Roads Malheur County

### Map 41

Project Features

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Access

New Road, Bladed

Important Siting Constraints and Other Features

20-ft Contours

● Existing Transmission Line

Designated Utility Corridors

Vale District (BLM) Utility Corridor

Vale District (BLM) Utility Corridor and West-wide Energy Corridor (WWEC)

West-wide Energy Corridor (WWEC)

VRM Class 3

Land Status

Bureau of Land Management

Private

Project features current as of October 28,

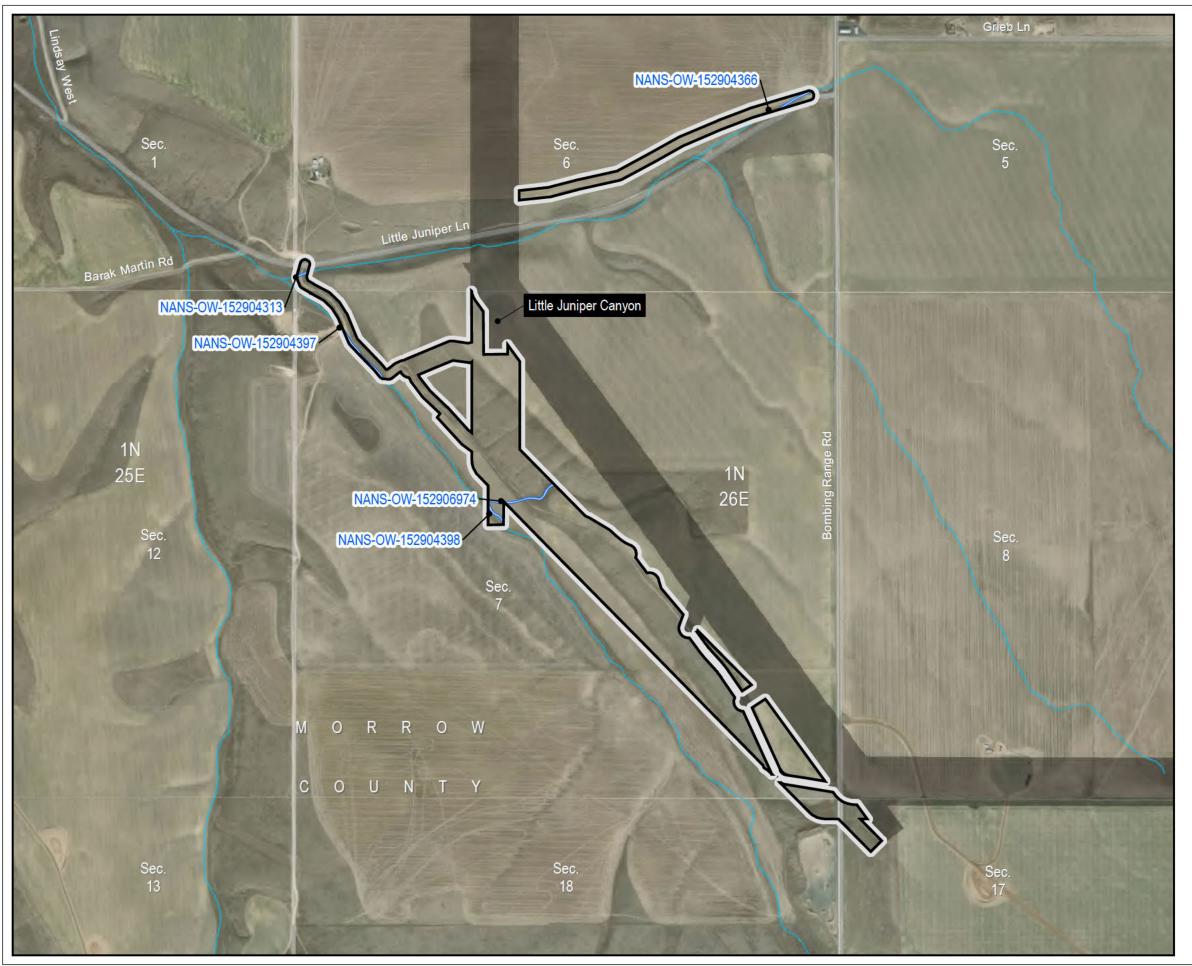
Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



1,000

Feet





### Figure 5-1 **Wetlands and Other Waters**

Little Juniper Canyon Morrow County

### Map 1

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

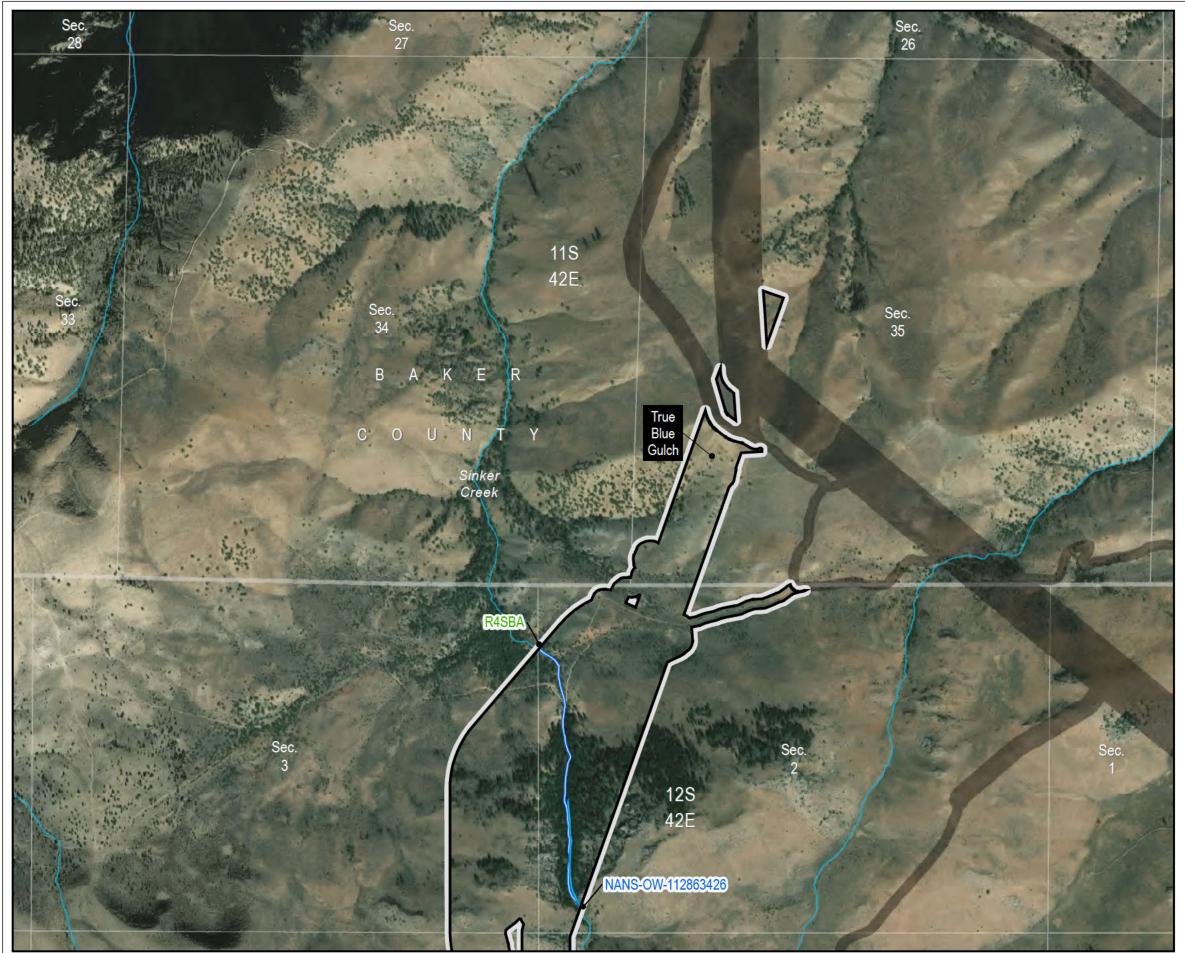
Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-1

**Wetlands and Other Waters** 

True Blue Gulch **Baker County** 

### Map 2

Wetlands and Other Waters Features

Wetlands

Unsurveyed Wetland (NWI)

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

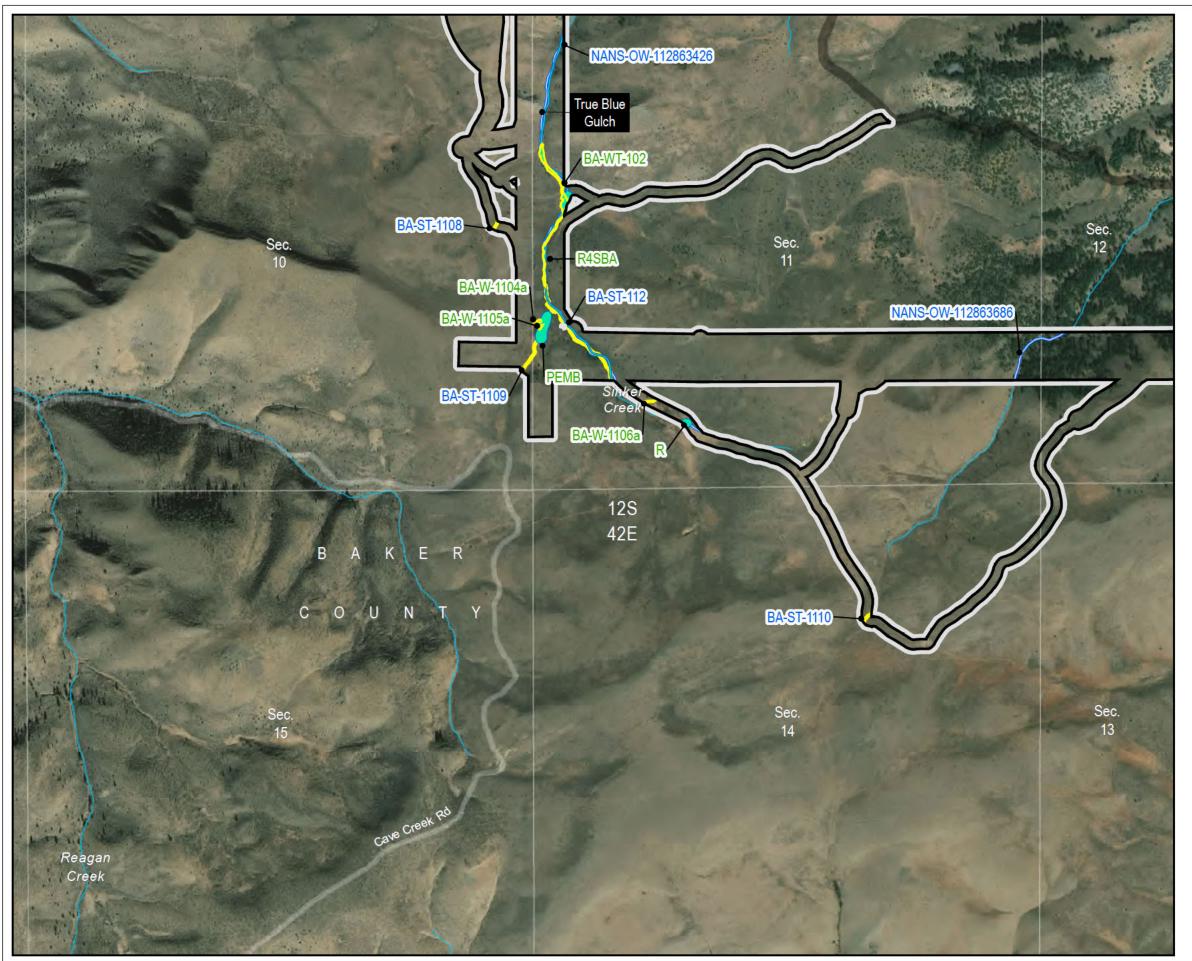
Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









### Figure 5-1 **Wetlands and Other Waters**

True Blue Gulch **Baker County** 

### Map 3

Wetlands and Other Waters Features

### Wetlands

Field Delineated Wetland

Unsurveyed Wetland (NWI)

### Other Waters

Field Delineated Stream

Unsurveyed Stream (NHD)

### **Project Features**

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Notes: Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









### Figure 5-1 **Wetlands and Other Waters**

True Blue Gulch **Baker County** 

### Map 4

Wetlands and Other Waters Features

Wetlands

Unsurveyed Wetland (NWI)

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

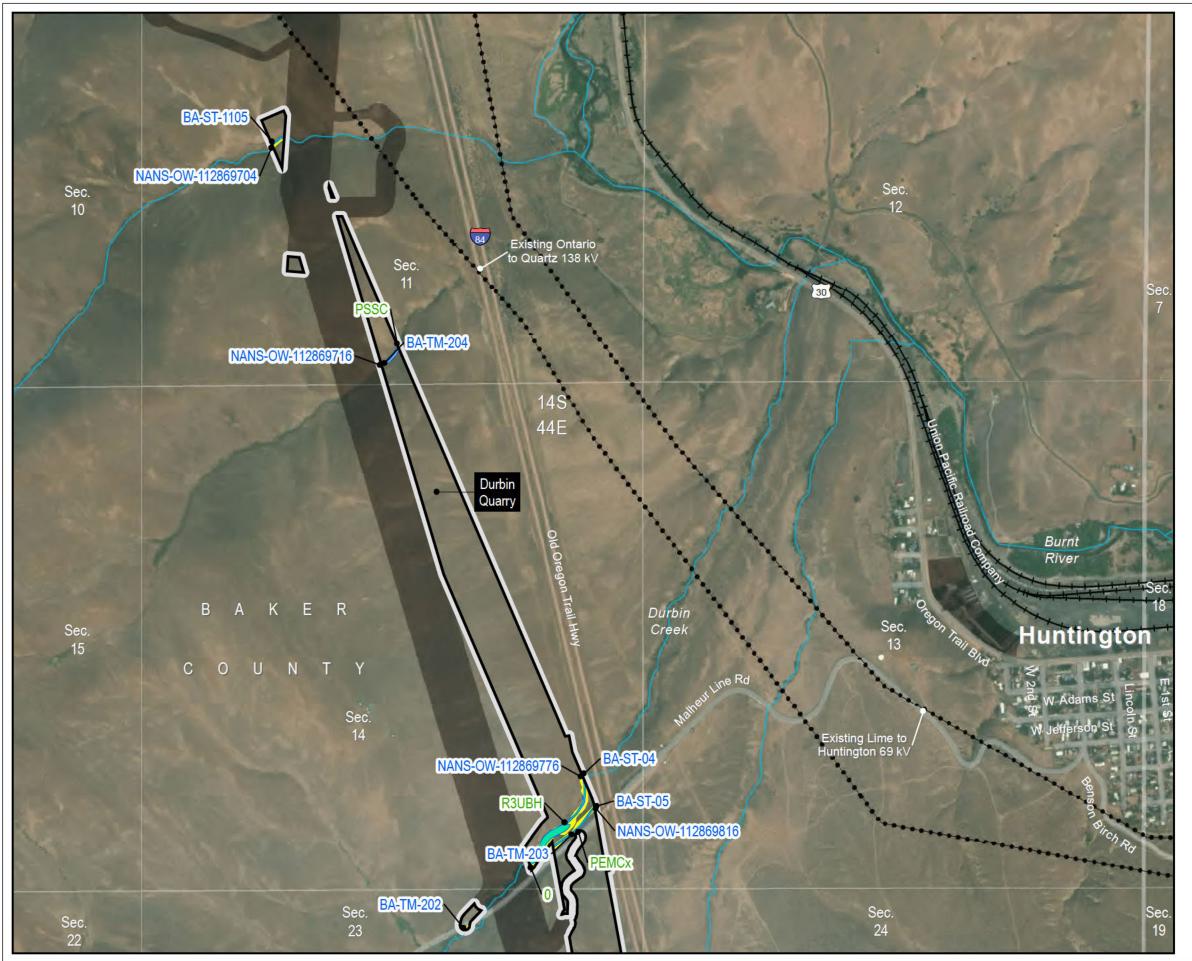
Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









### Figure 5-1 **Wetlands and Other Waters**

**Durbin Quarry Baker County** 

### Map 5

Wetlands and Other Waters Features

Wetlands

**Unsurveyed Wetland** (NWI)

Other Waters

Field Delineated Stream

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Project features current as of October 28,

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









### Figure 5-1 **Wetlands and Other Waters**

**Durbin Quarry Baker County** 

### Map 6

Wetlands and Other Waters Features

Wetlands

Unsurveyed Wetland (NWI)

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28,

<u>Data Source(s)</u>: Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads Morrow County

### Map 1

### **Project Features**

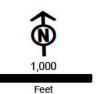
New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

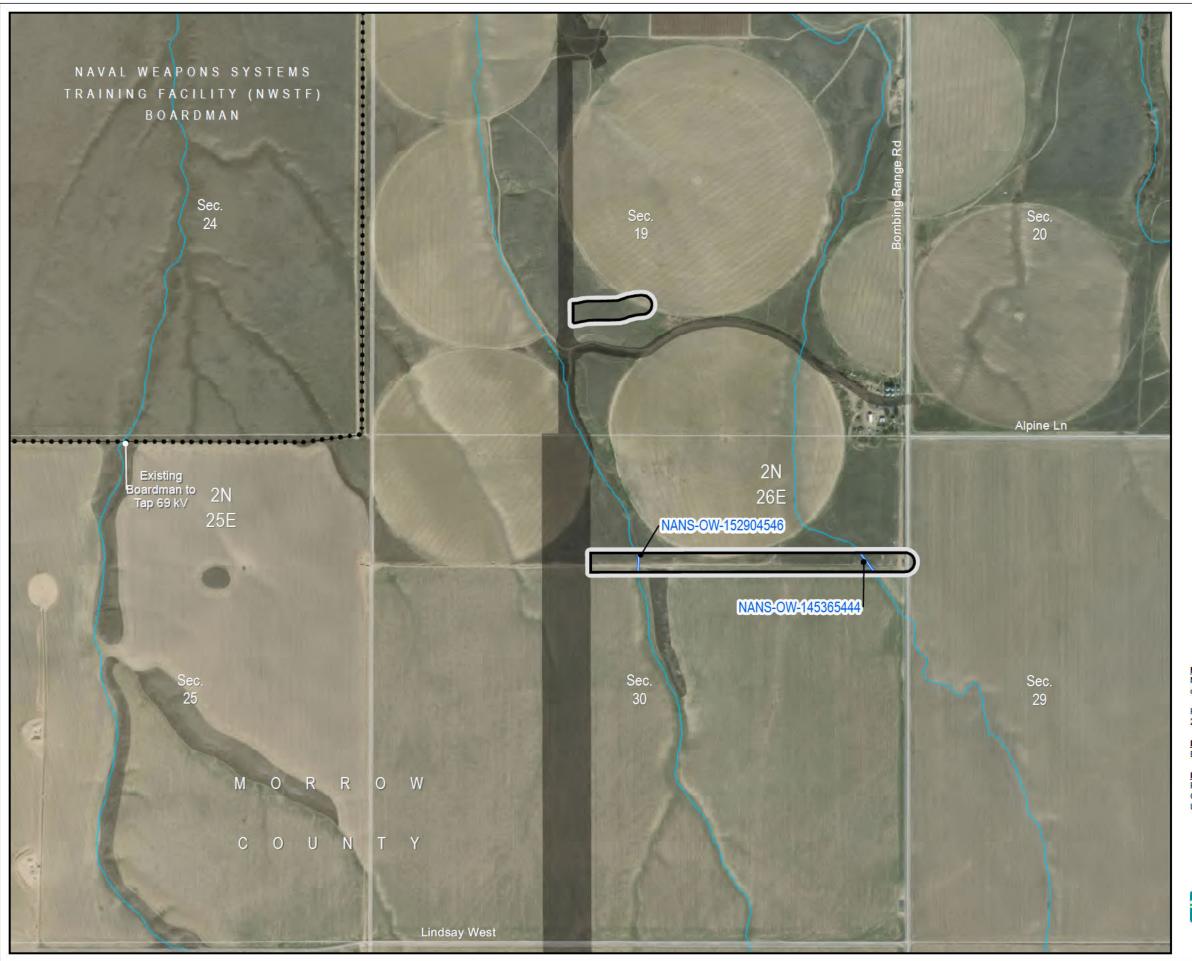
Project features current as of October 28, 2022.

<u>Data Source(s)</u>: Esri, ODOT, USFWS, USGS, Velocity









### Figure 5-2 **Wetlands and Other Waters**

Access Roads Morrow County

### Map 2

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 Wetlands and Other Waters

Access Roads Morrow County

Map 3

**Project Features** 

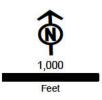
New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads Morrow County

### Map 4

**Project Features** 

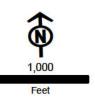
New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

<u>Data Source(s)</u>: Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Umatilla County** 

### Map 5

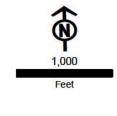
### **Project Features**

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Umatilla County** 

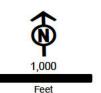
### Map 6

**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Umatilla County** 

### Map 7

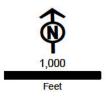
**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Umatilla County** 

### Map 8

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Umatilla County** 

### Map 9

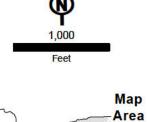
**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

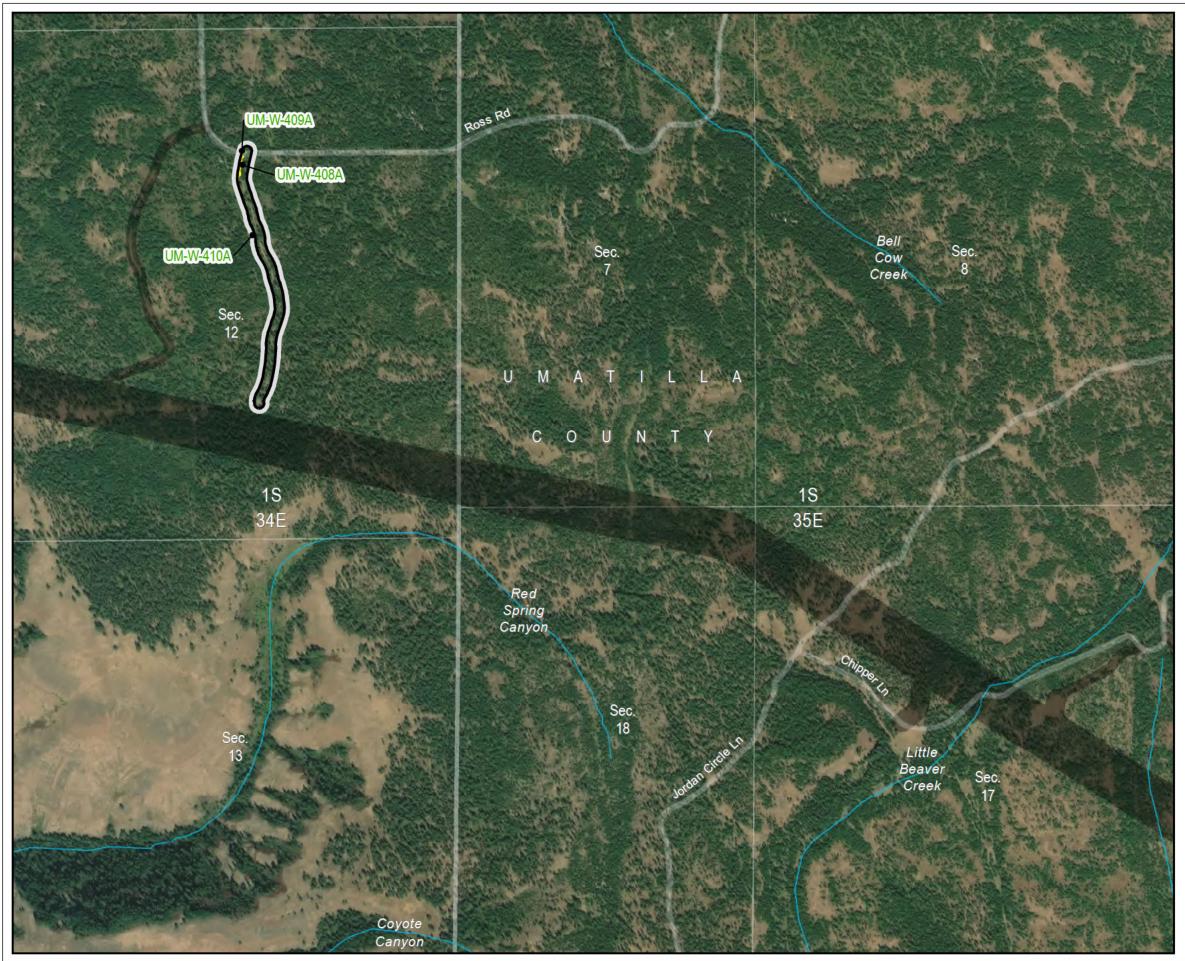
Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









### Figure 5-2 **Wetlands and Other Waters**

Access Roads **Umatilla County** 

### Map 10

Wetlands and Other Waters Features

Wetlands

Field Delineated Wetland

**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

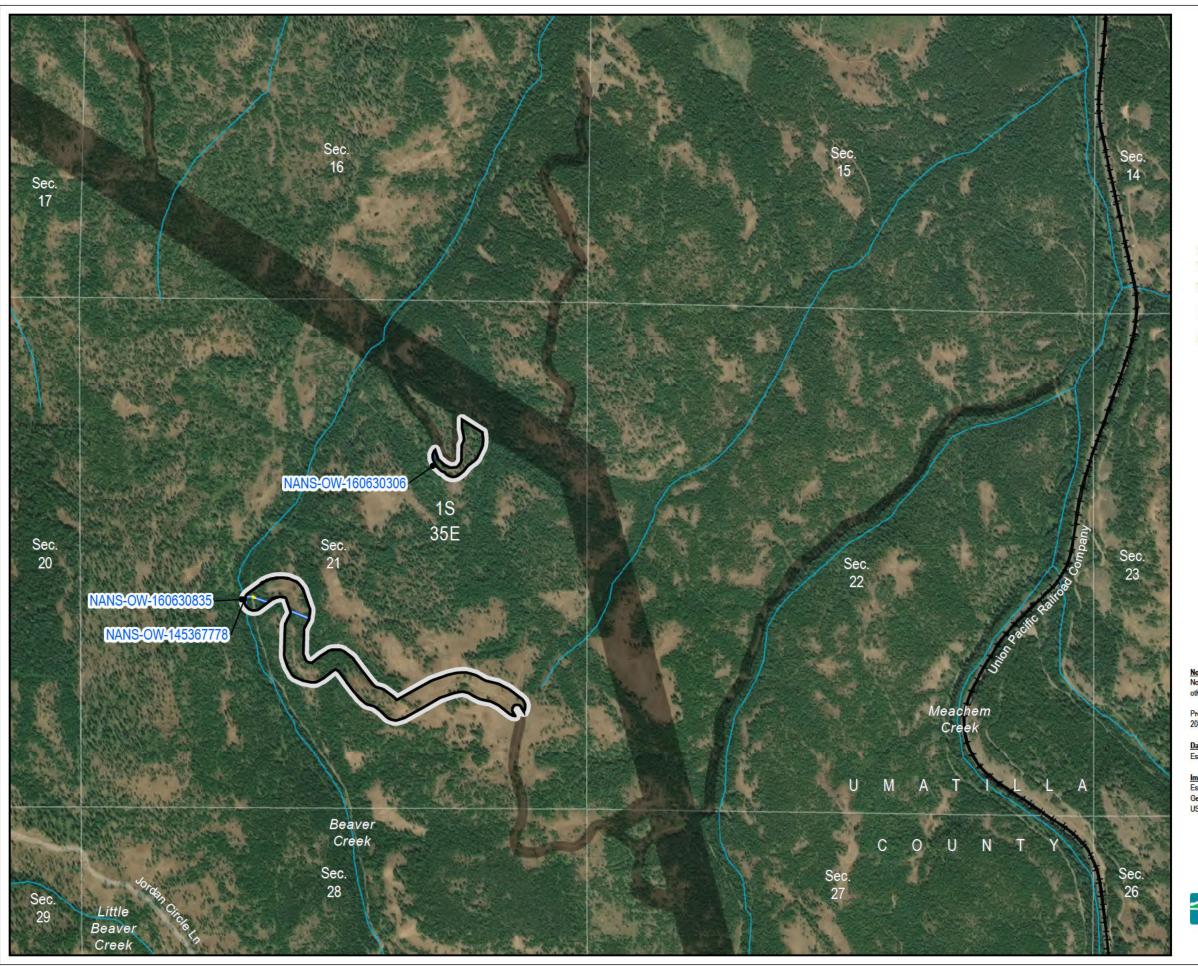
Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









### Figure 5-2 **Wetlands and Other Waters**

Access Roads **Umatilla County** 

### Map 11

Wetlands and Other Waters Features

Field Delineated Wetland

Other Waters

Unsurveyed Stream (NHD)

### **Project Features**

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Union County** 

### Map 12

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 Wetlands and Other Waters

Access Roads **Union County** 

Map 13

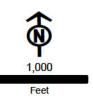
**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Union County** 

### Map 14

Other Waters

Unsurveyed Stream (NHD)

### **Project Features**

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Union County** 

Map 15

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









### Figure 5-2 **Wetlands and Other Waters**

Access Roads **Union County** 

### Map 16

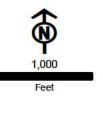
**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Project features current as of October 28, 2022.

<u>Data Source(s)</u>: Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Union County** 

### Map 17

### **Project Features**

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity

Imagery: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, and IGN



1,000

Feet





### Figure 5-2 **Wetlands and Other Waters**

Access Roads **Baker County** 

### **Map 18**

Wetlands and Other Waters Features

Wetlands

Unsurveyed Wetland (NWI)

Other Waters

Field Delineated Stream

Unsurveyed Stream (NHD)

**Project Features** 

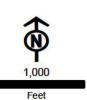
New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Notes: Not intended for construction or any uses

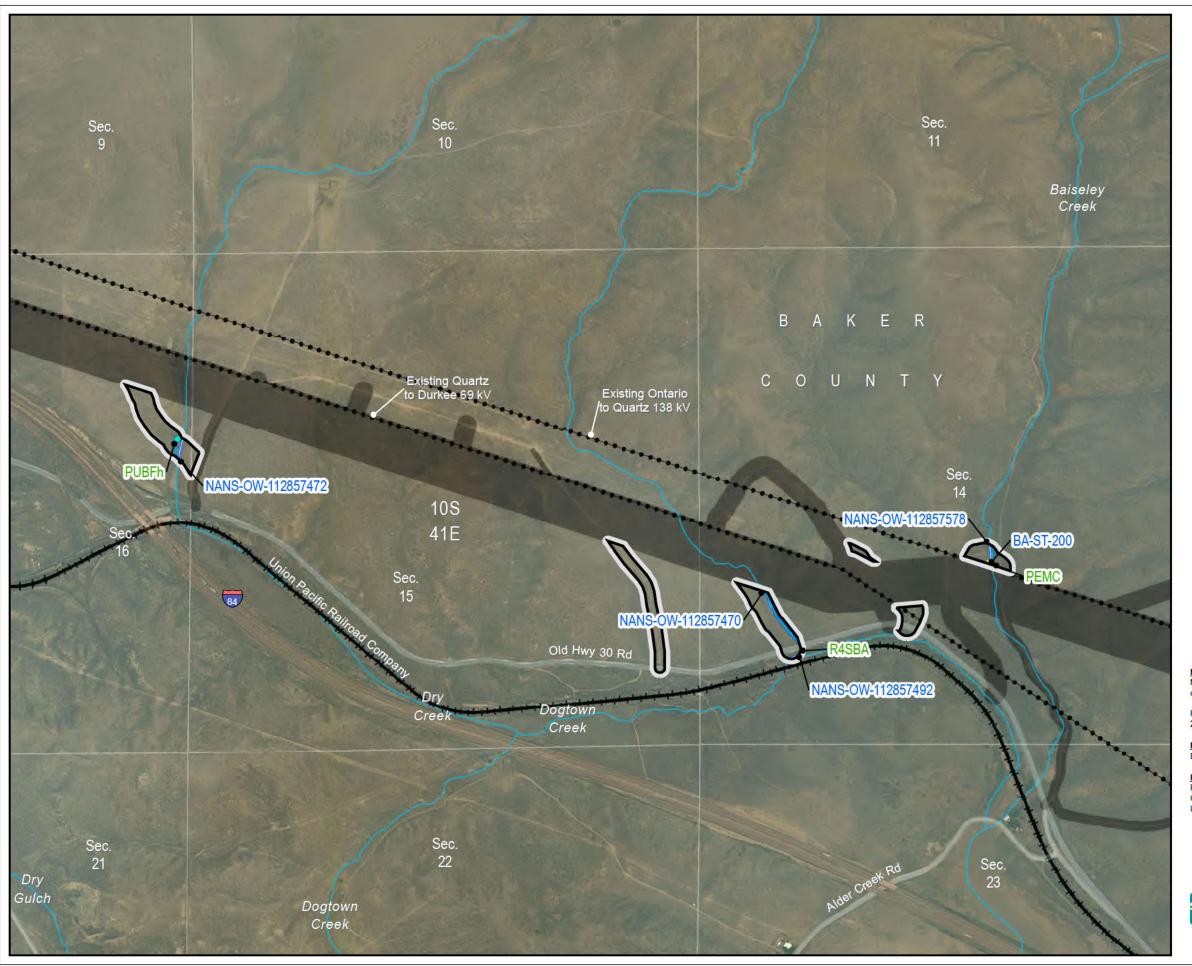
Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









## Figure 5-2 **Wetlands and Other Waters**

Access Roads **Baker County** 

### **Map 19**

Wetlands and Other Waters Features

Wetlands

**Unsurveyed Wetland** (NWI)

Other Waters

Field Delineated Stream

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Baker County** 

**Map 20** 

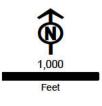
**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Baker County** 

### Map 21

**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

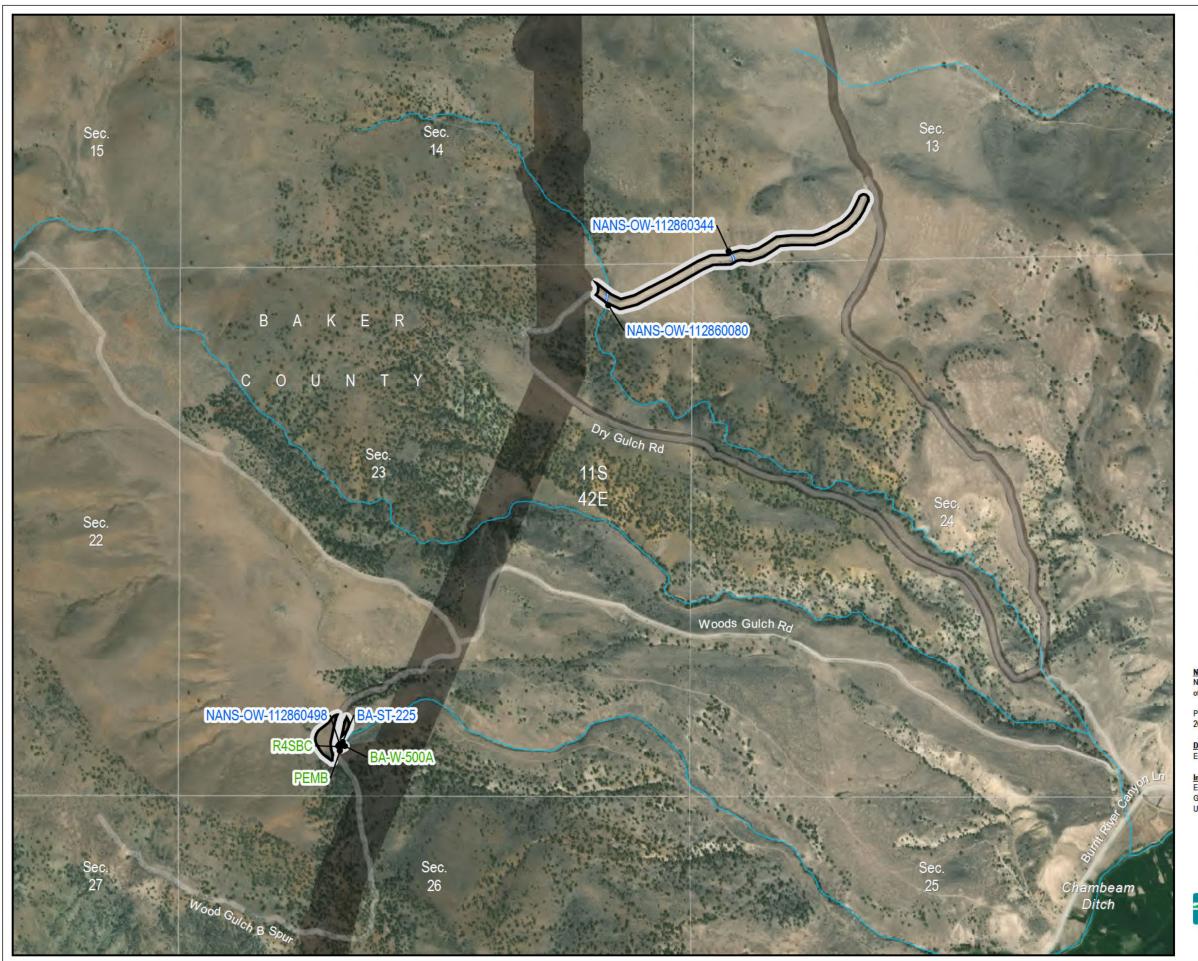
Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Baker County** 

### Map 22

Wetlands and Other Waters Features

### Wetlands

Field Delineated Wetland

Unsurveyed Wetland (NWI)

### Other Waters

Field Delineated Stream

Unsurveyed Stream (NHD)

### **Project Features**

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Project features current as of October 28,

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









## Figure 5-2 **Wetlands and Other Waters**

Access Roads **Baker County** 

Map 23

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Baker County** 

### **Map 24**

**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Baker County** 

### Map 25

Other Waters

Unsurveyed Stream (NHD)

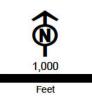
**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads **Baker County** 

### Map 26

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 Wetlands and Other Waters

Access Roads **Baker County** 

### **Map 27**

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

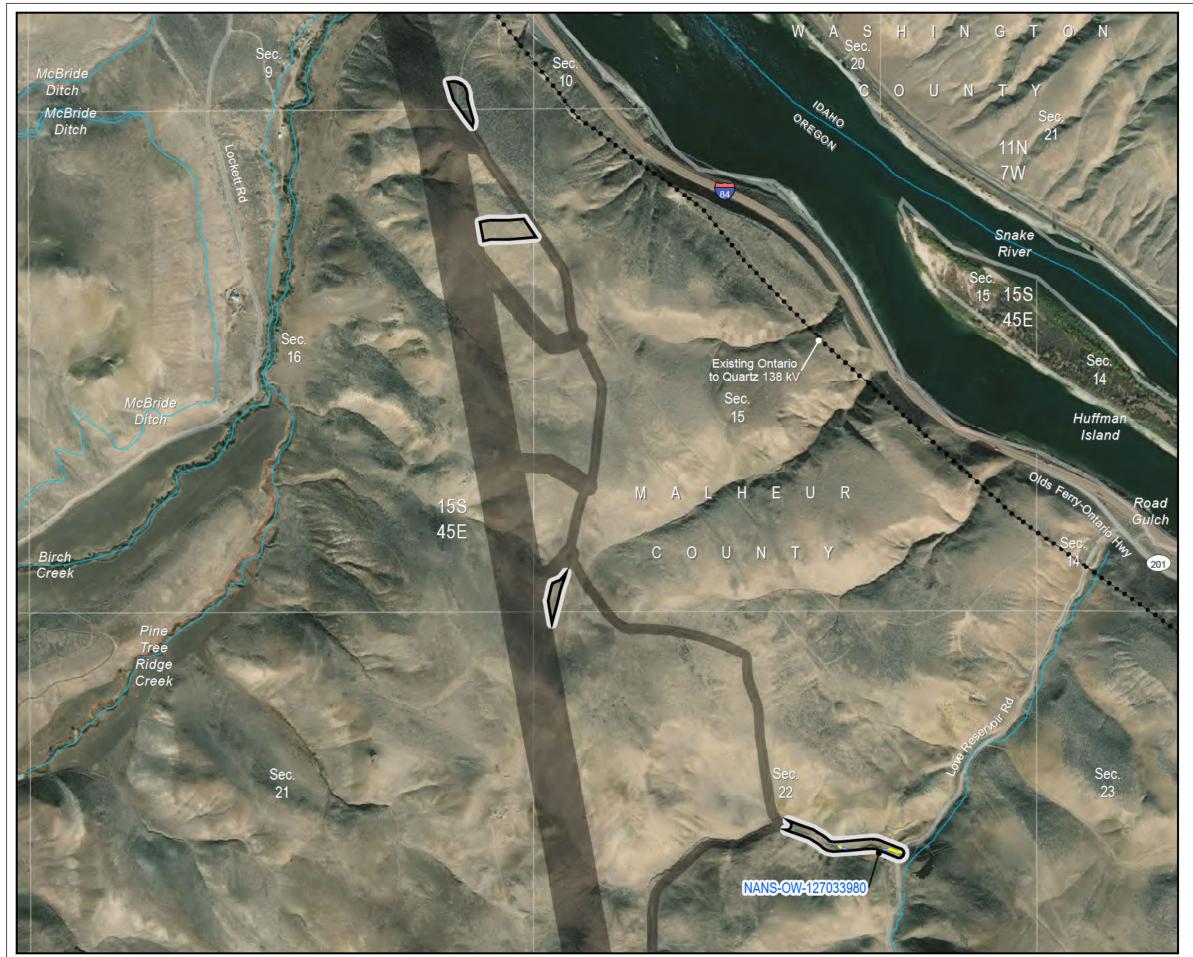
Project features current as of October 28,

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

### **Map 28**

Wetlands and Other Waters Features

Wetlands

Field Delineated Wetland

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

Map 29

**Project Features** 

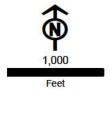
New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Notes: Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









## Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

### Map 30

Wetlands and Other Waters Features

Wetlands

Unsurveyed Wetland (NWI)

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

<u>Data Source(s)</u>: Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

# Map 31

**Project Features** 

New RFA1 Site Boundary

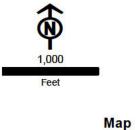
Site Boundary
Approved in Site
Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

<u>Data Source(s)</u>: Esri, ODOT, USFWS, USGS, Velocity

Imagery: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, and IGN



Area







## Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

Map 32

### **Project Features**

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Not intended for construction or any uses

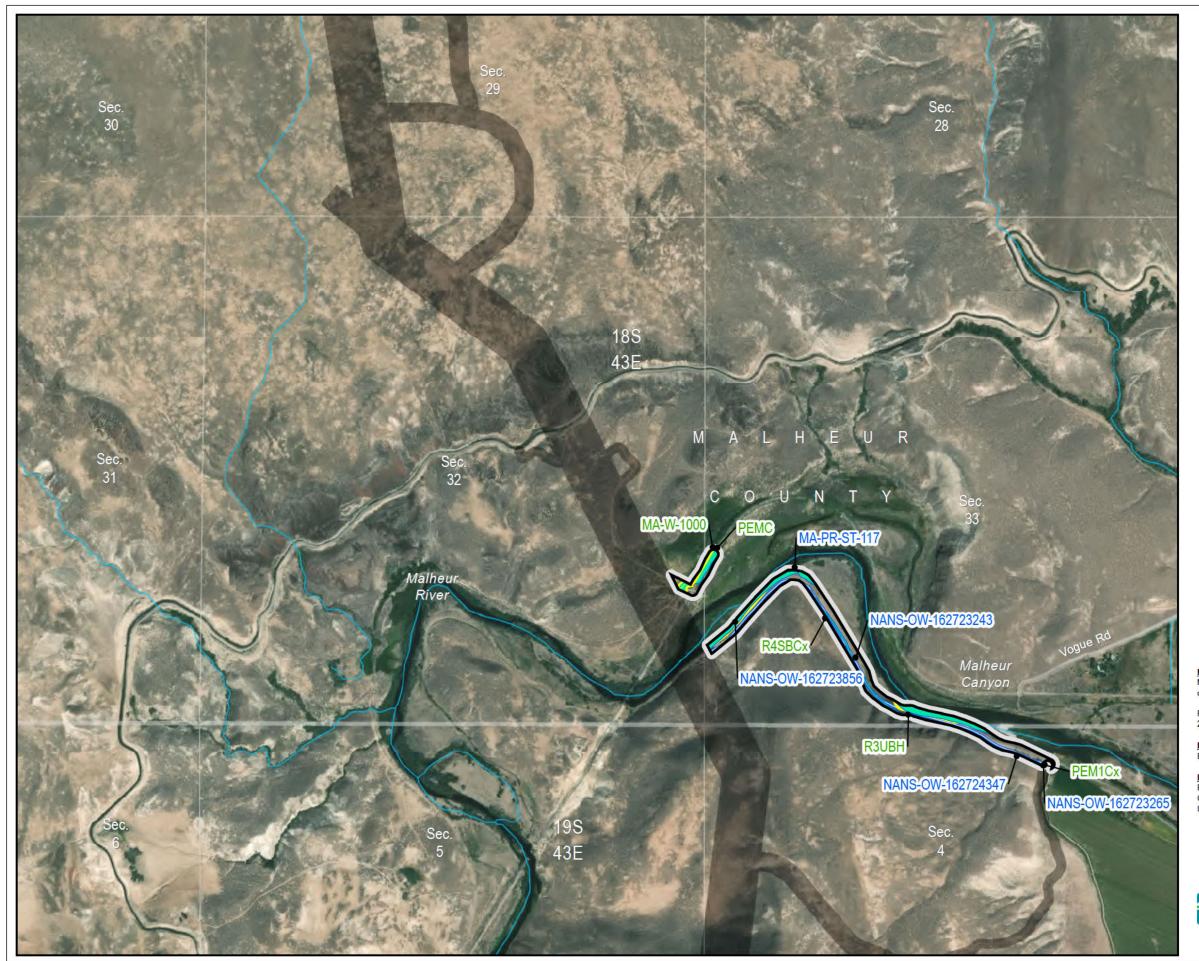
Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









## Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

### **Map 33**

Wetlands and Other Waters Features

### Wetlands

Field Delineated Wetland

Unsurveyed Wetland (NWI)

### Other Waters

Field Delineated Stream

Unsurveyed Stream (NHD)

### **Project Features**

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

Map 34

### **Project Features**

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

Map 35

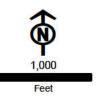
### **Project Features**

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

Map 36

**Project Features** 

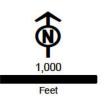
New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

**Map 37** 

**Project Features** 

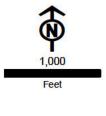
New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









## Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

### Map 38

Wetlands and Other Waters Features

Wetlands

Field Delineated Wetland

Unsurveyed Wetland (NWI)

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

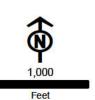
New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Notes: Not intended for construction or any uses

Project features current as of October 28, 2022.

<u>Data Source(s)</u>: Esri, ODOT, USFWS, USGS, Velocity









## Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

### **Map 39**

Wetlands and Other Waters Features

Wetlands

Unsurveyed Wetland (NWI)

Other Waters

Field Delineated

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Notes: Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

### Map 40

Wetlands and Other Waters Features

### Wetlands

Field Delineated Wetland

Unsurveyed Wetland (NWI)

### Other Waters

Field Delineated Stream

### **Project Features**

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, ODOT, USFWS, USGS, Velocity









# Figure 5-2 **Wetlands and Other Waters**

Access Roads Malheur County

### Map 41

Wetlands and Other Waters Features

Wetlands

Unsurveyed Wetland (NWI)

Other Waters

Unsurveyed Stream (NHD)

**Project Features** 

New RFA1 Site Boundary

Site Boundary
Approved in Site
Certificate

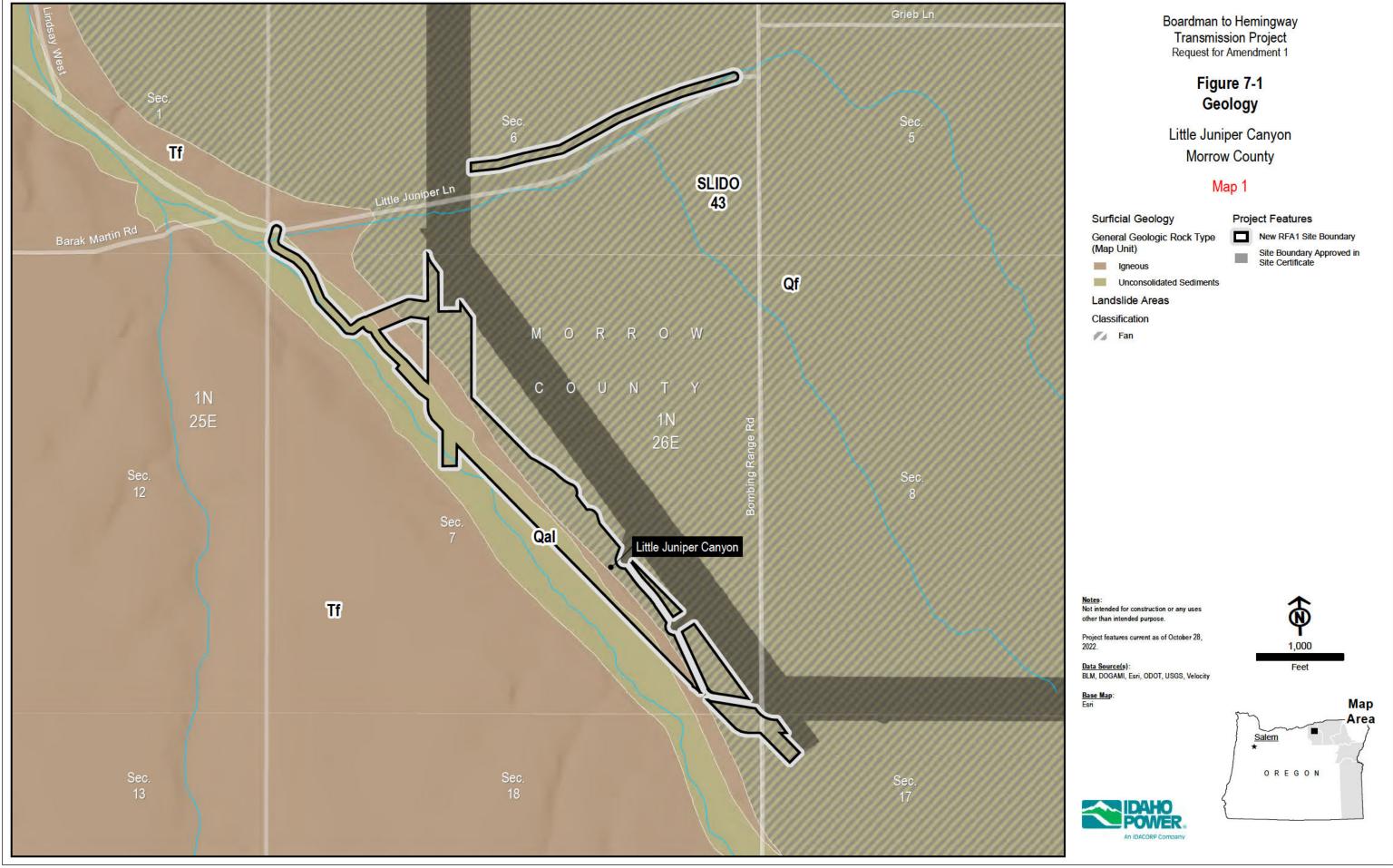
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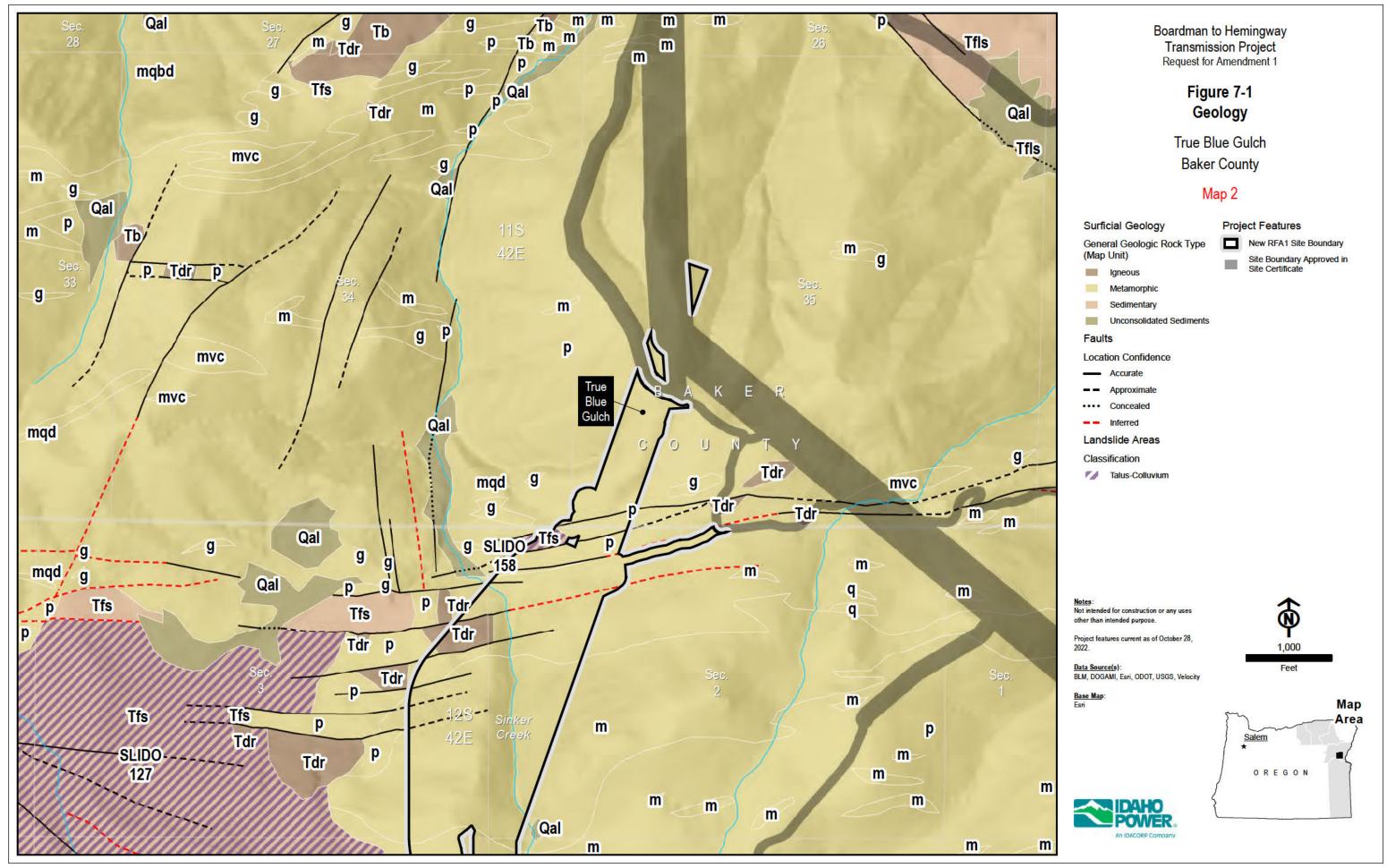
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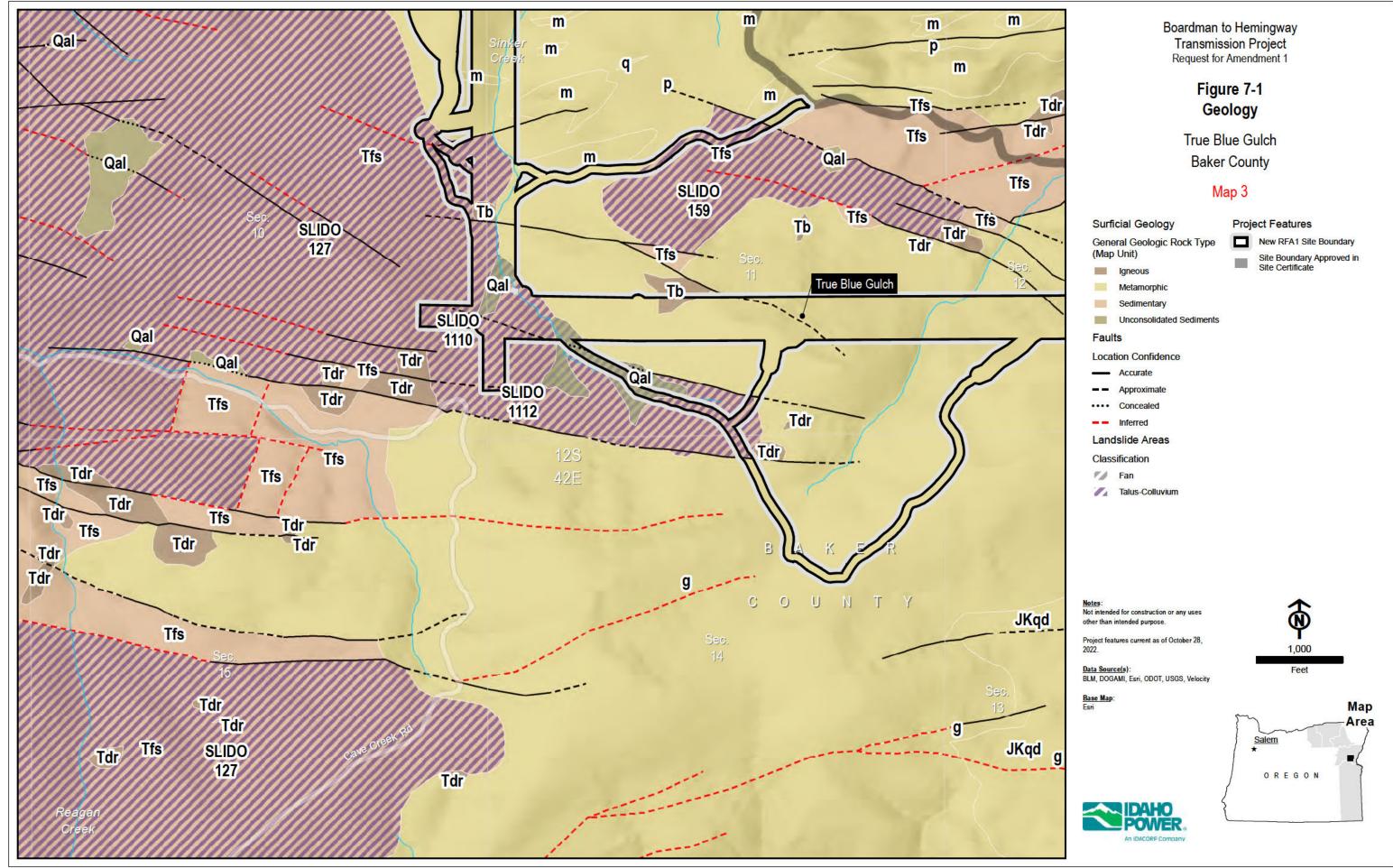


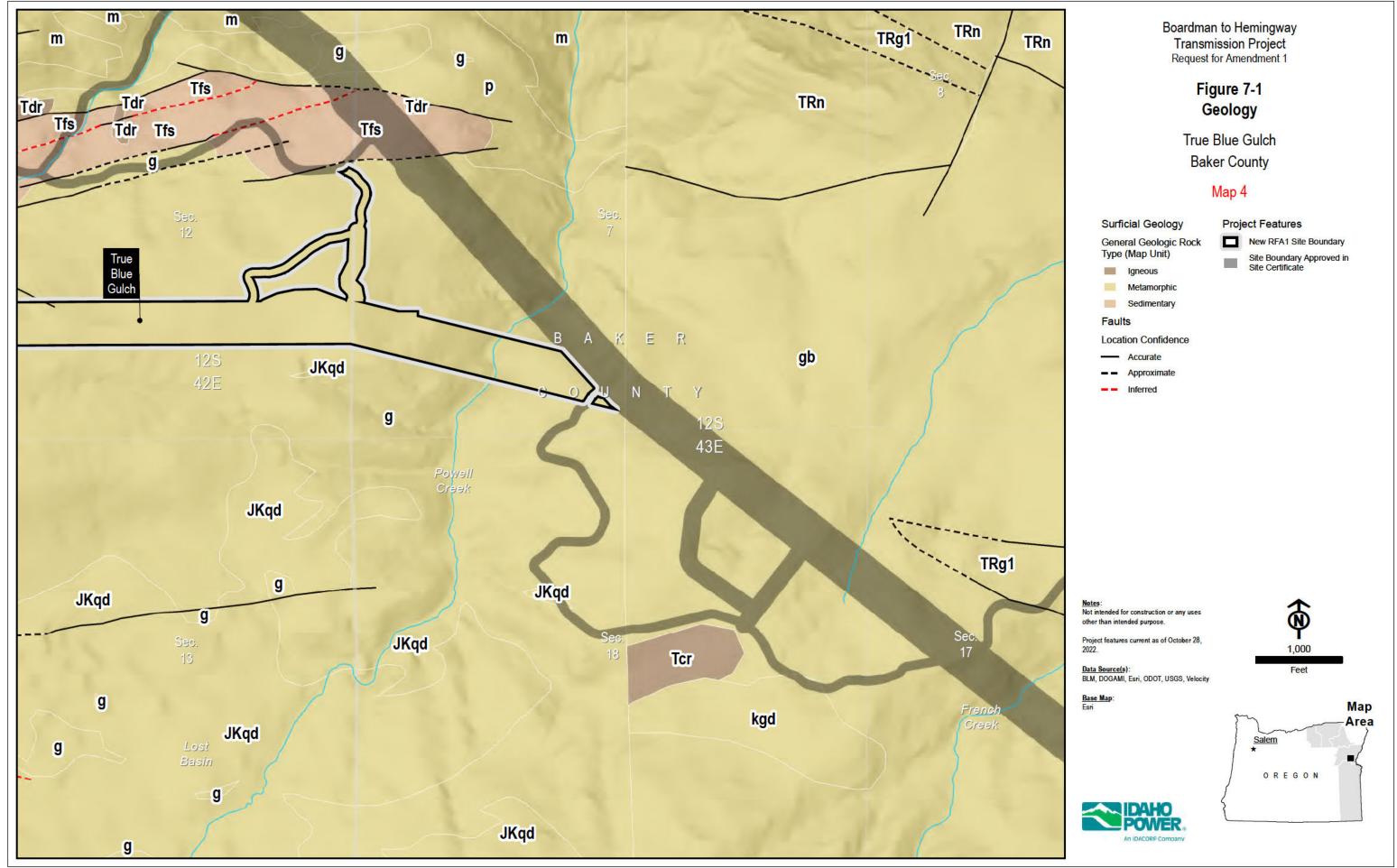


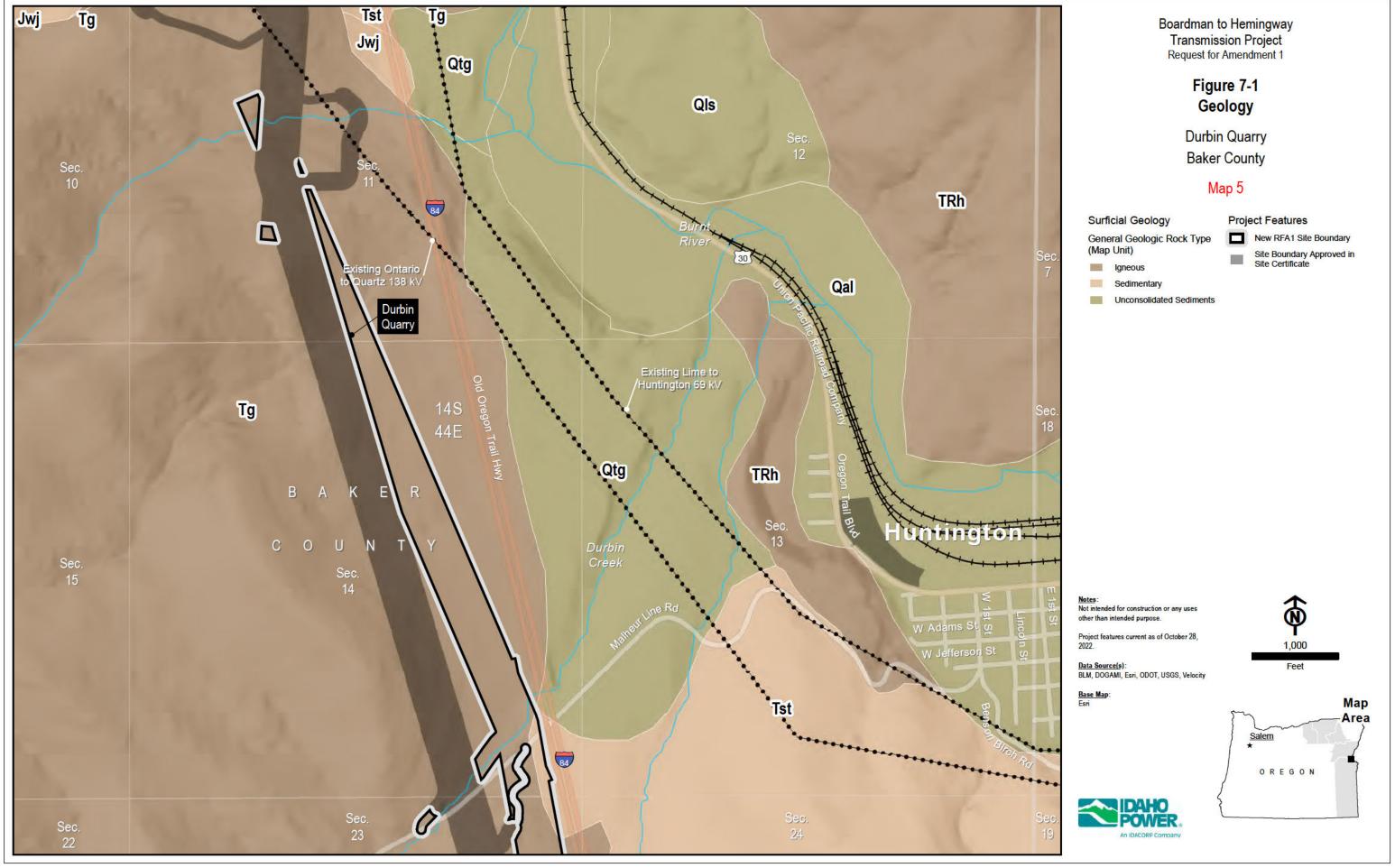


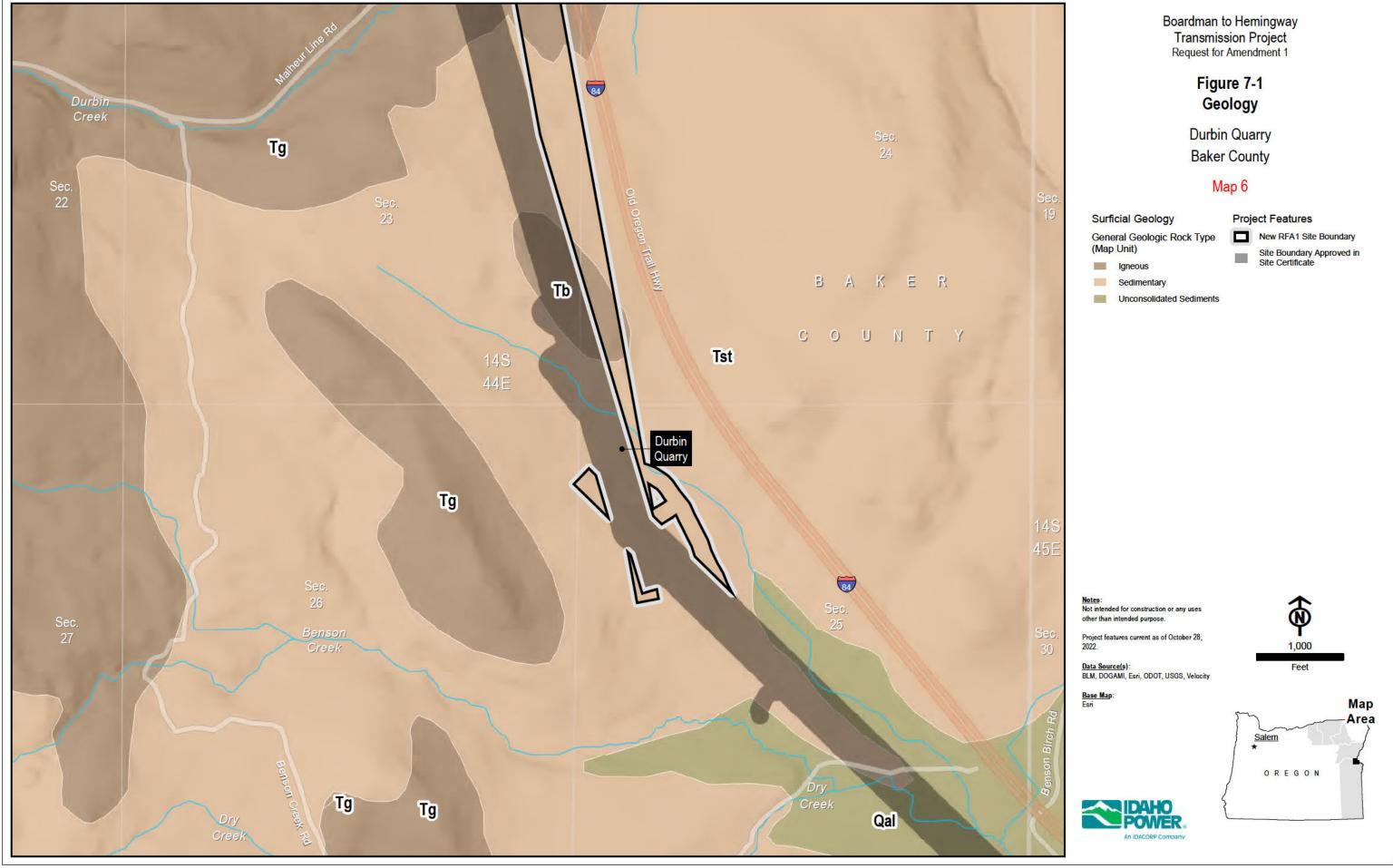


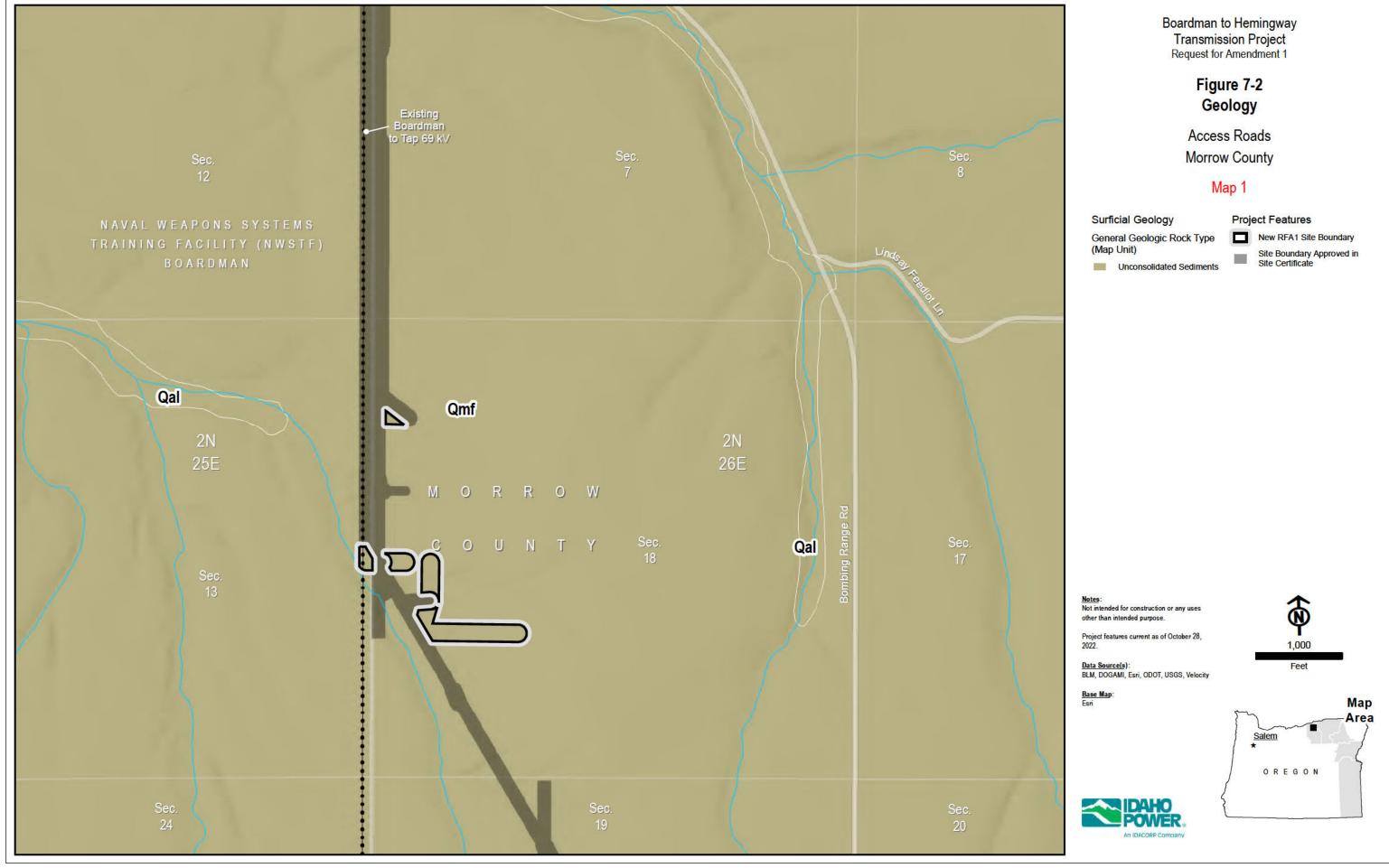


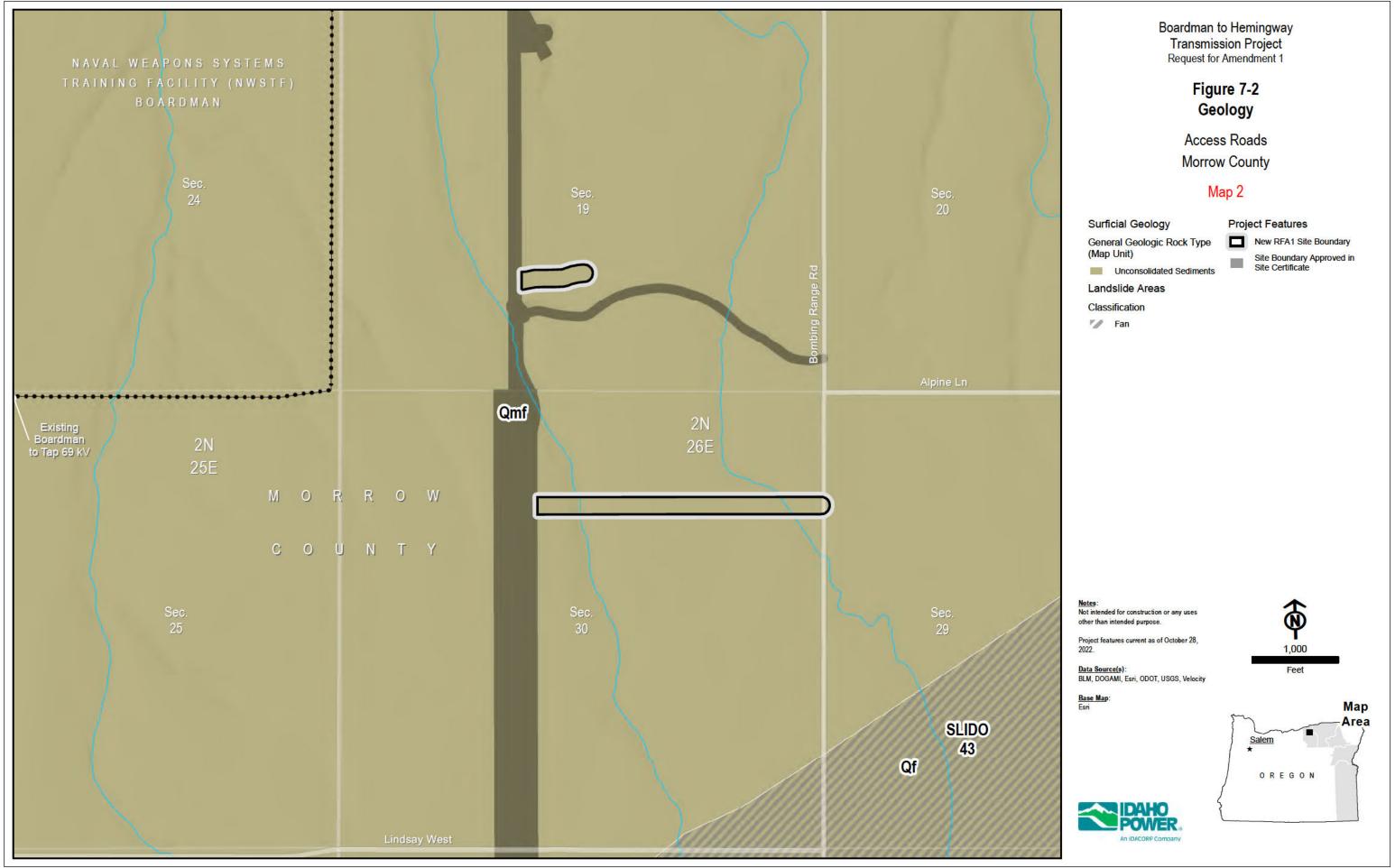


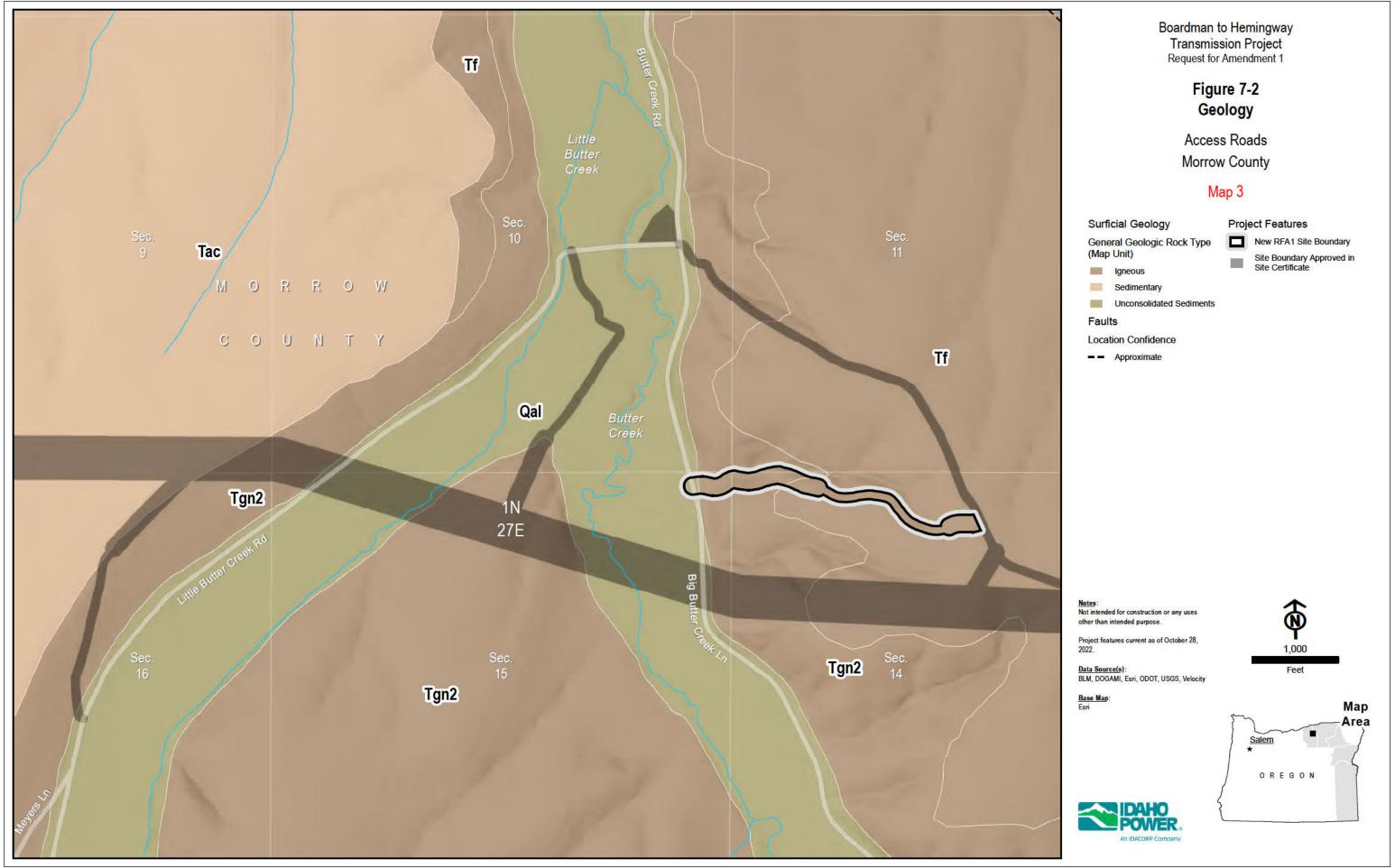


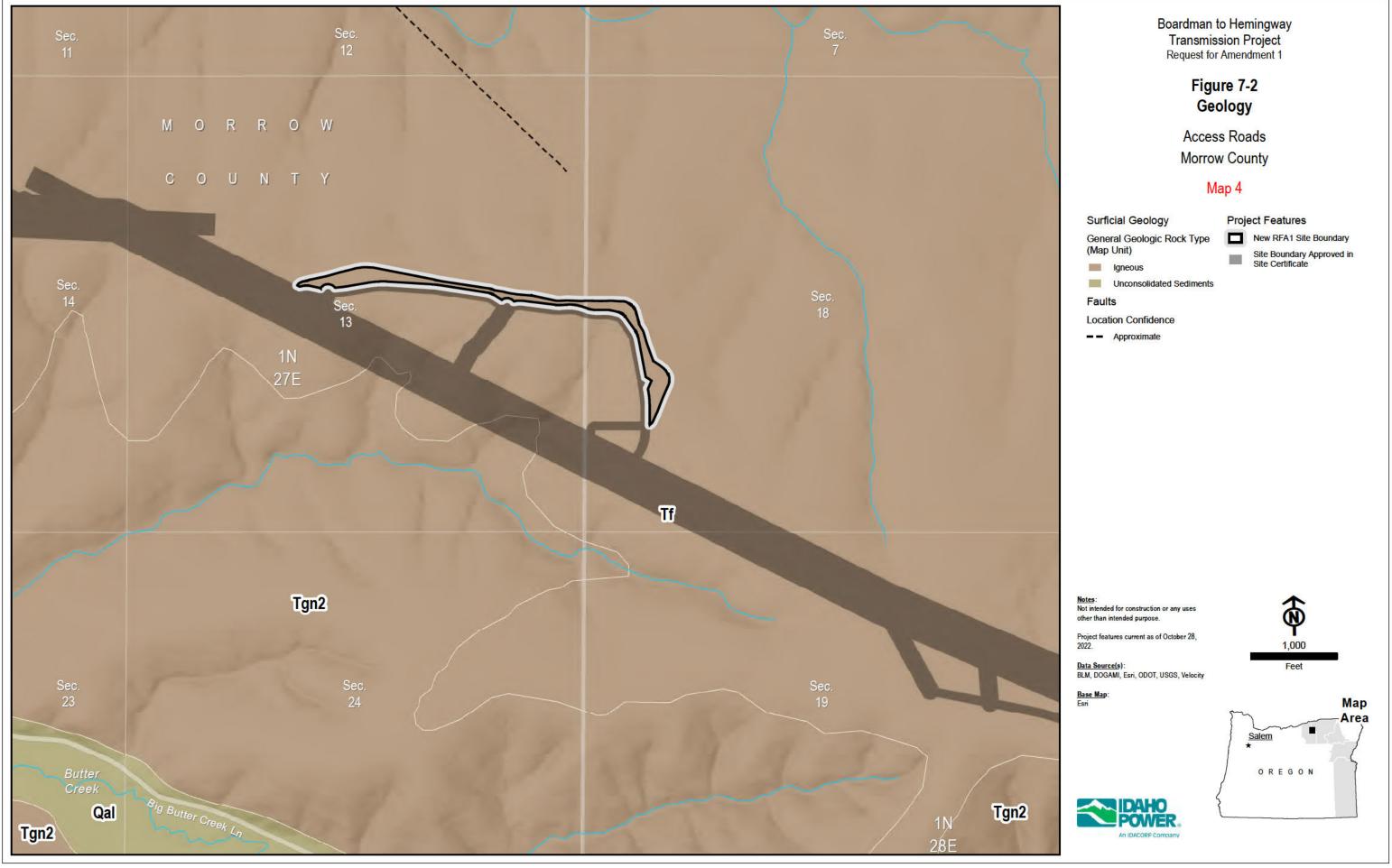


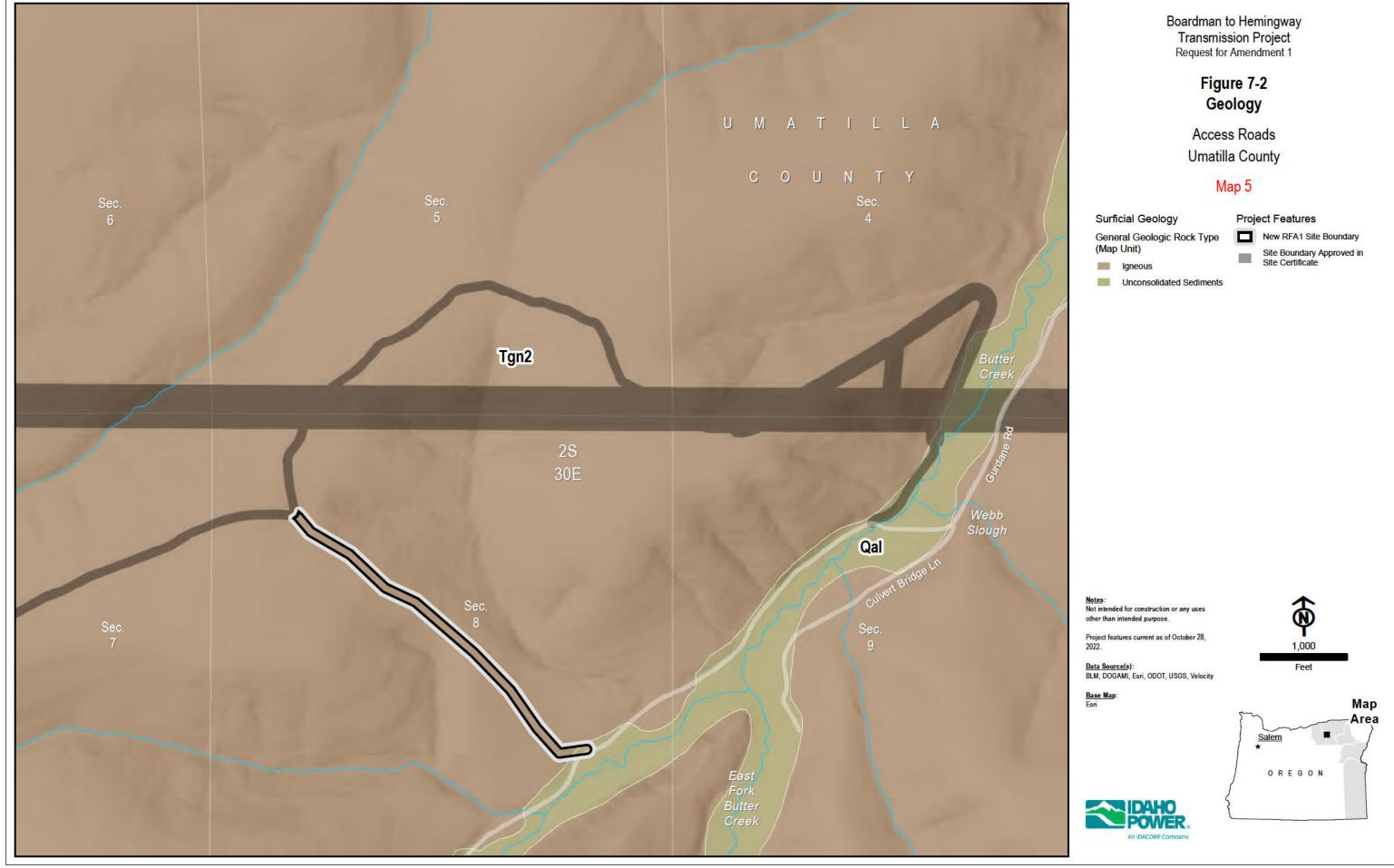


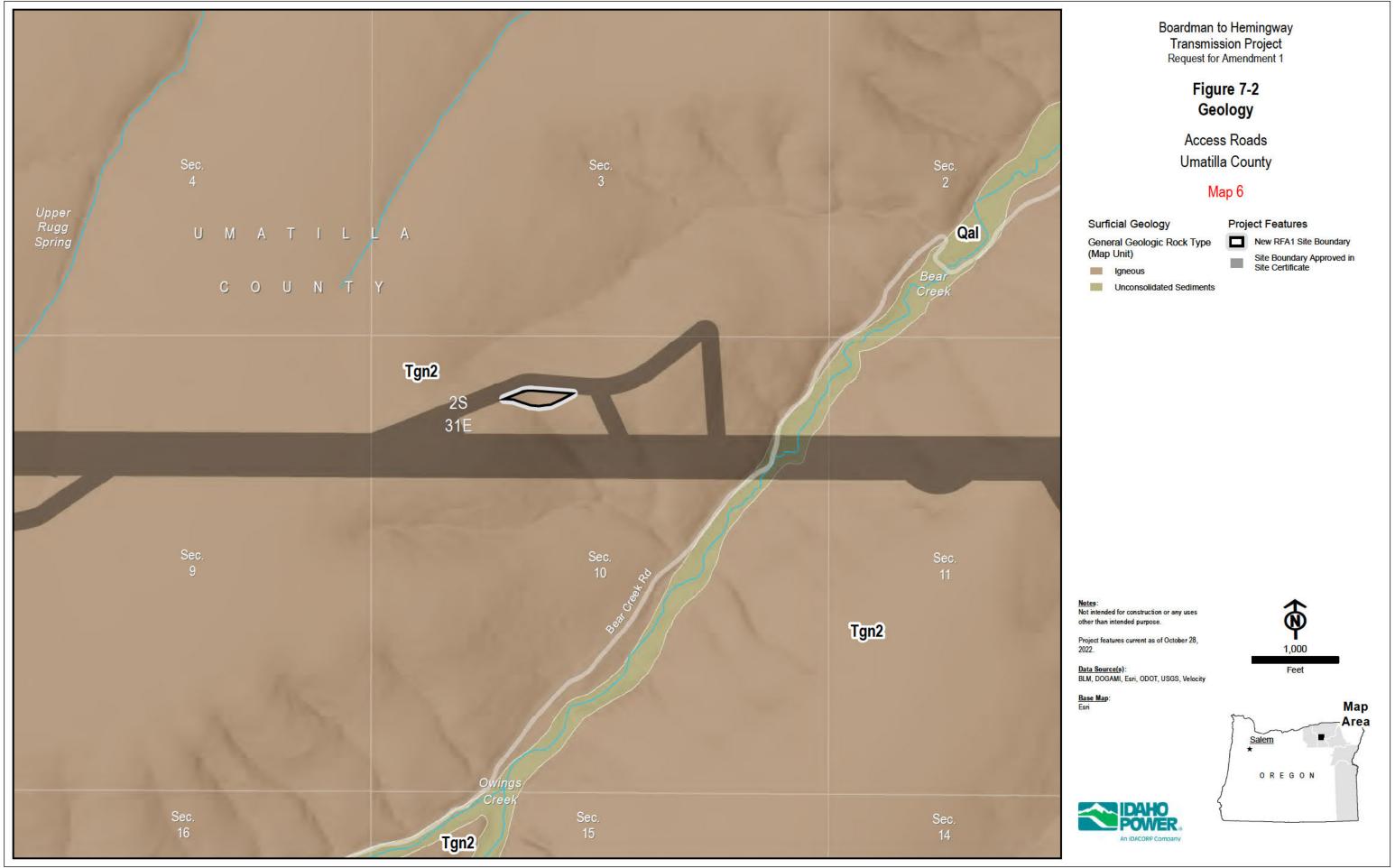


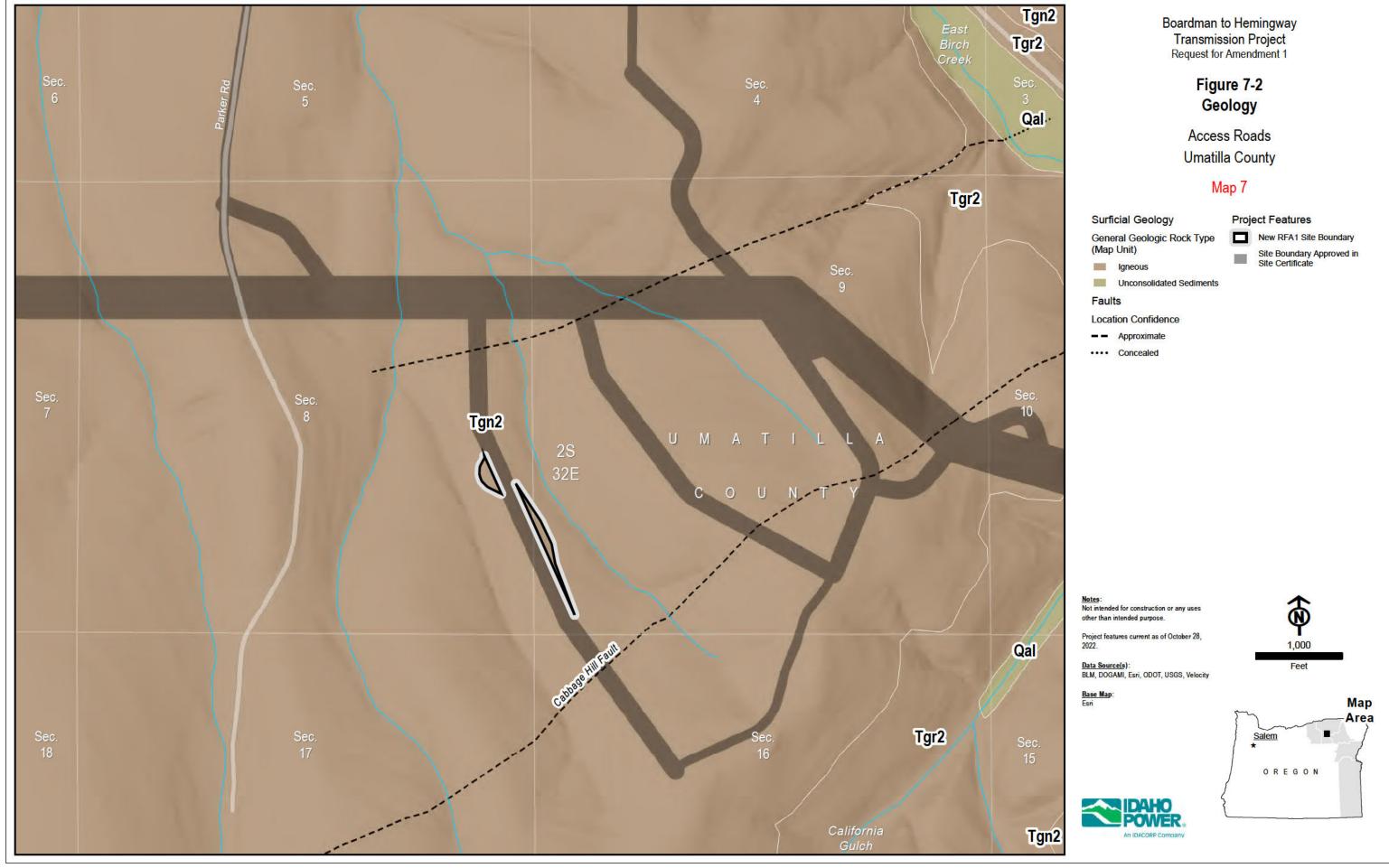


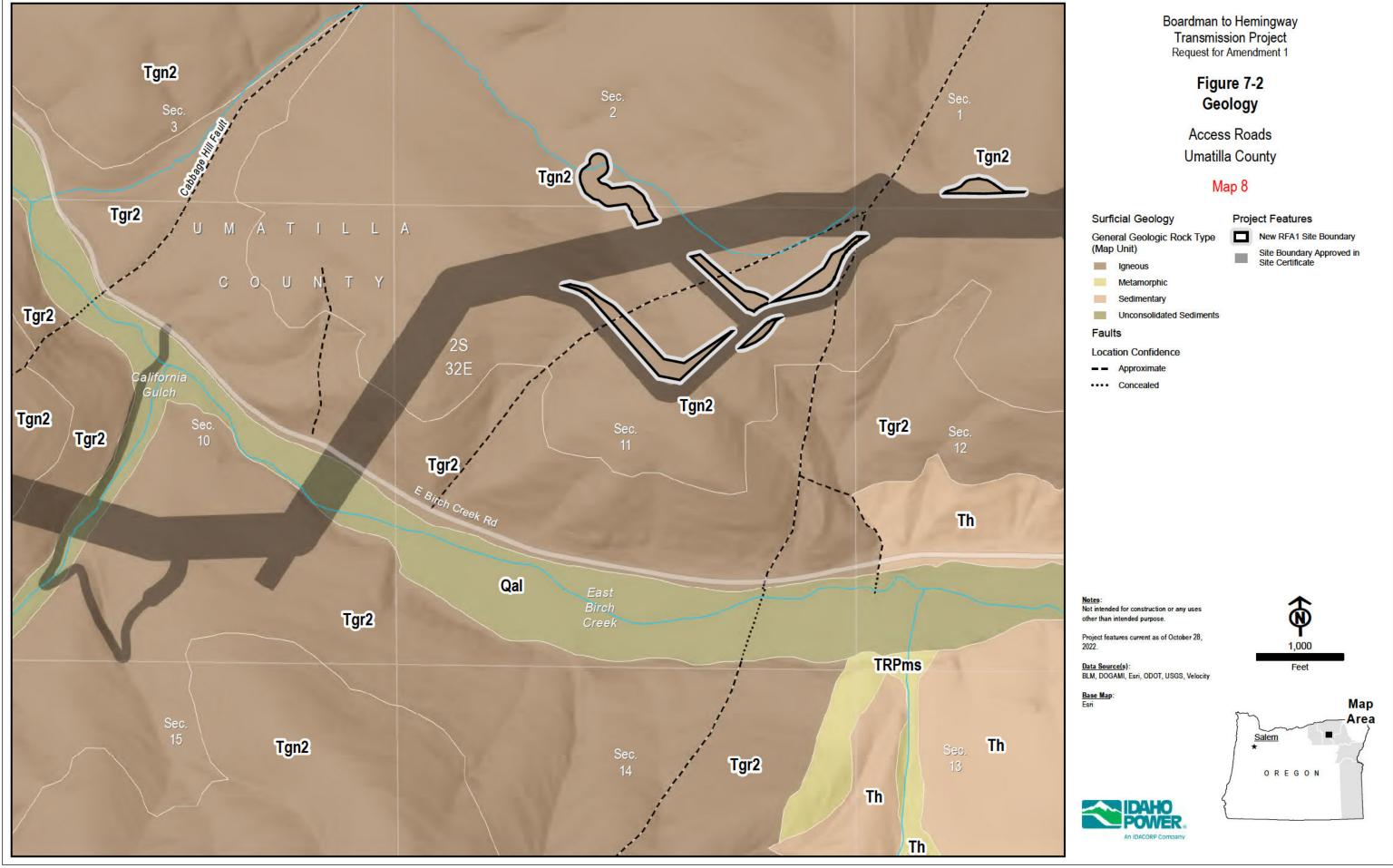


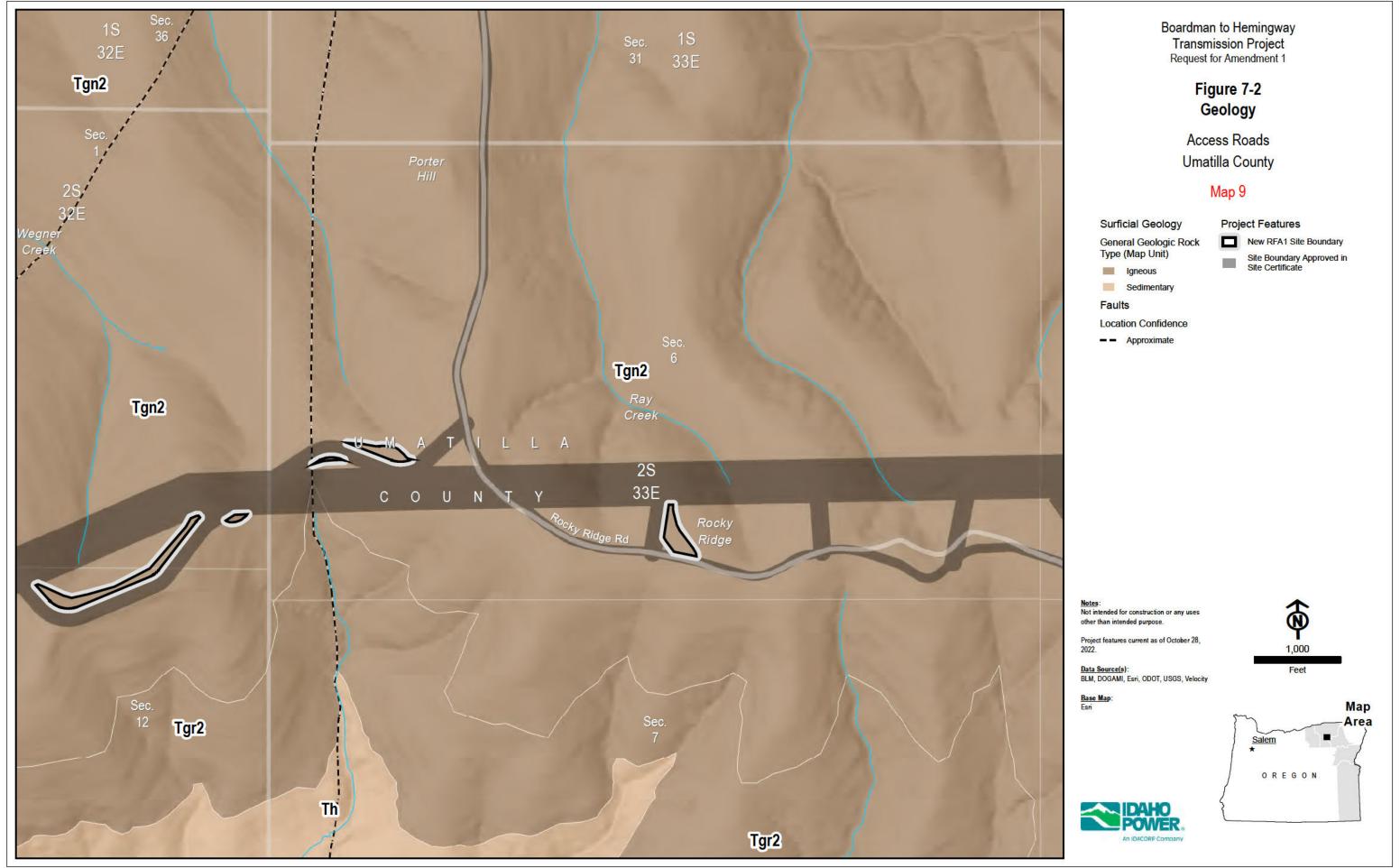


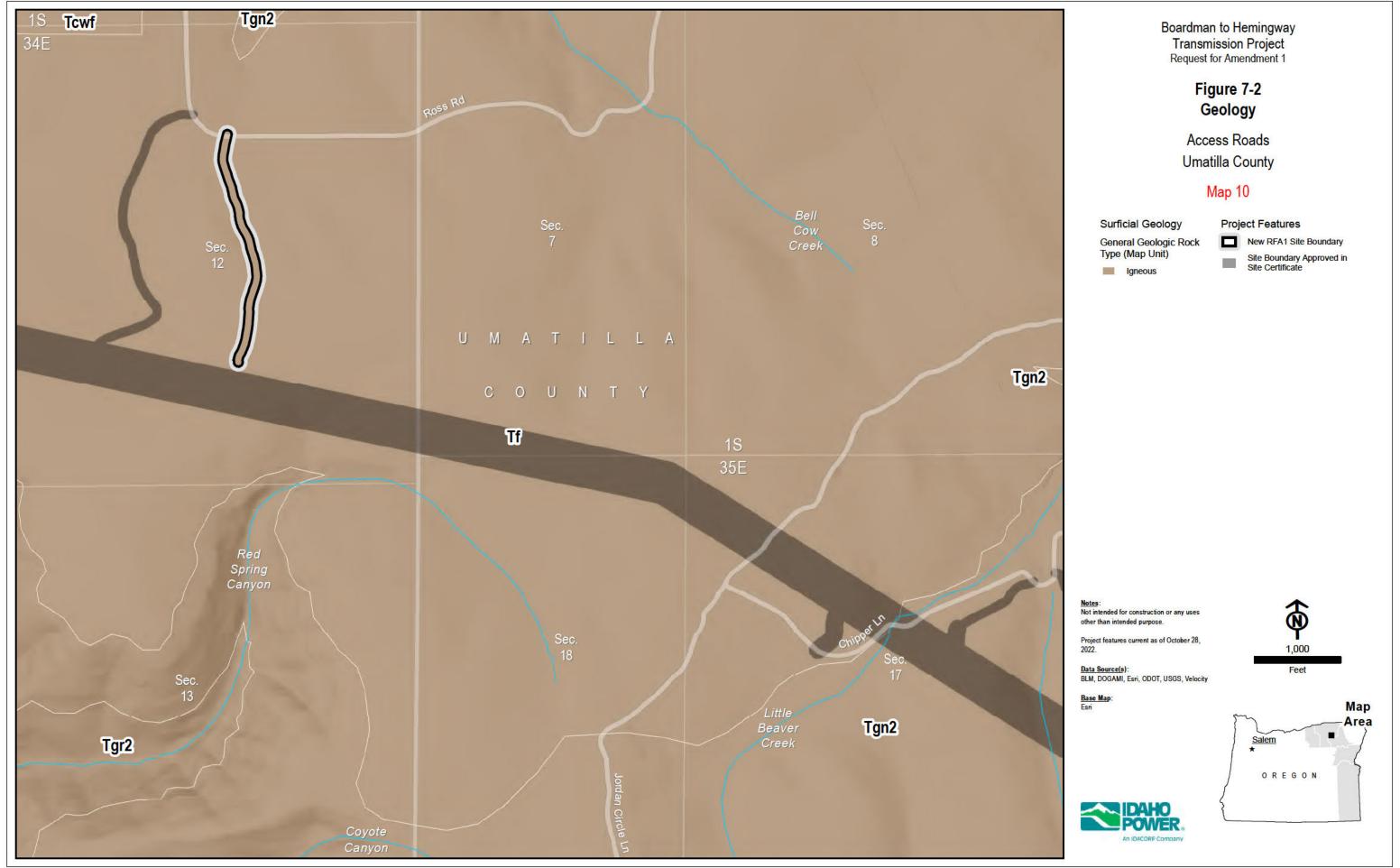


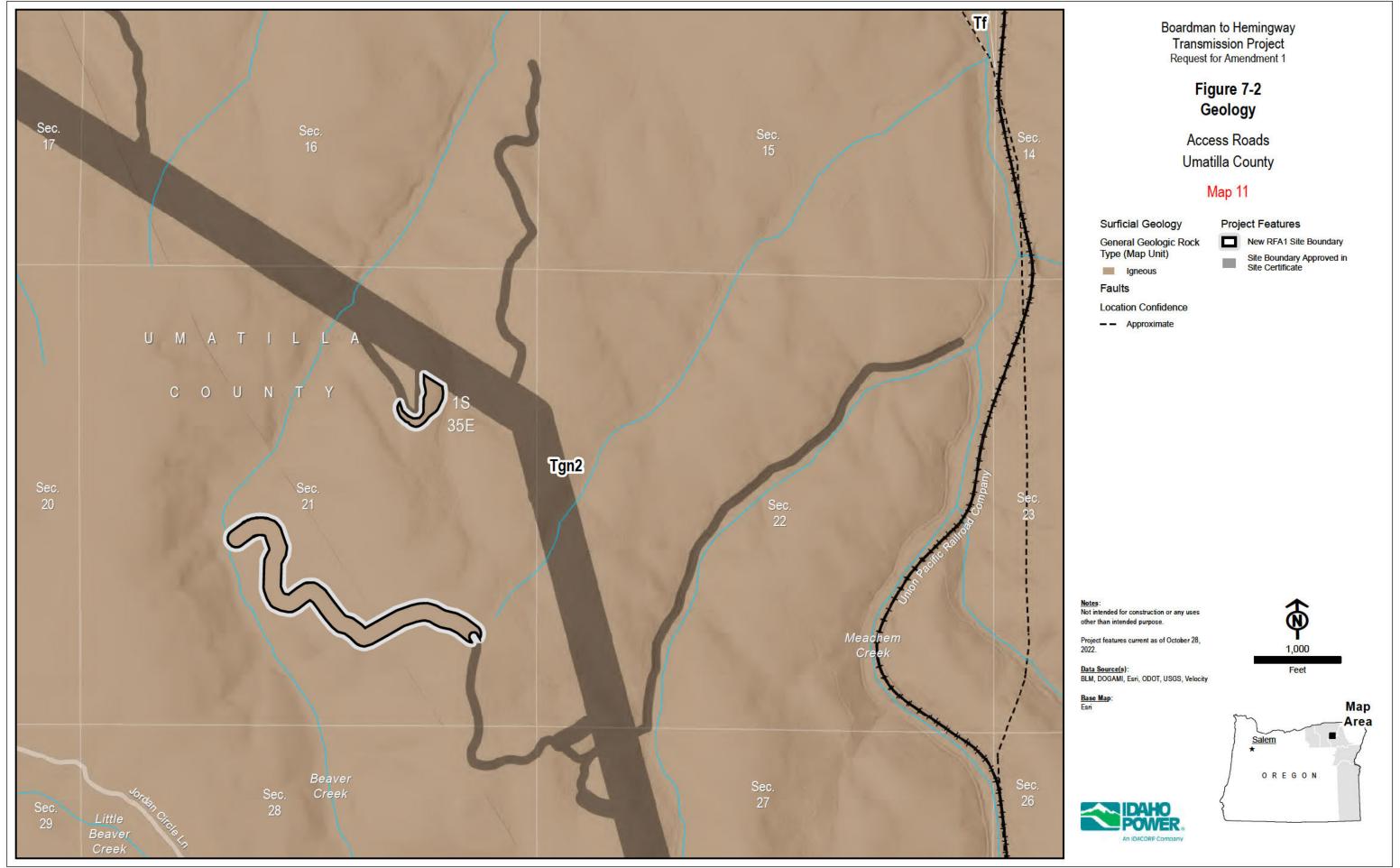


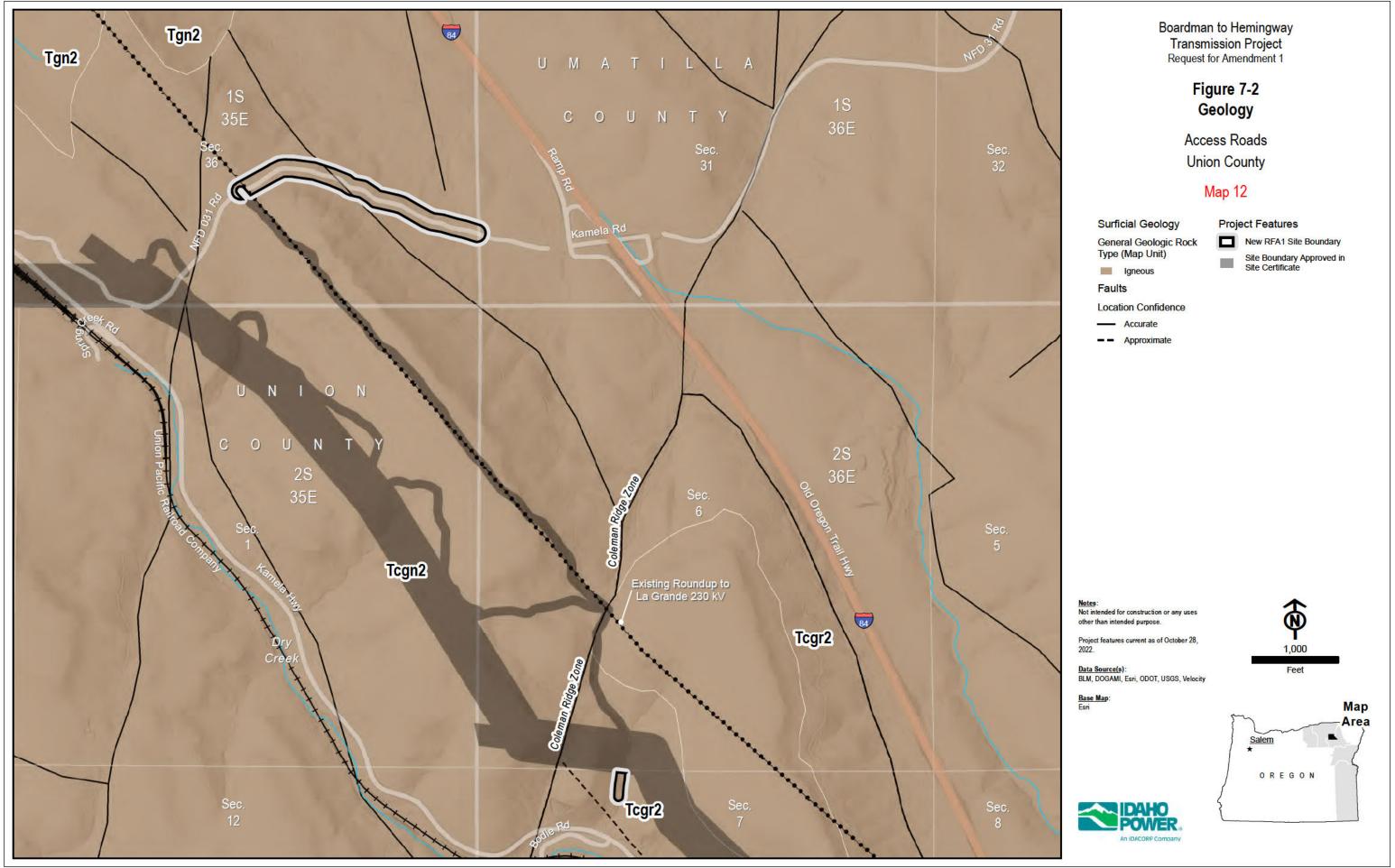


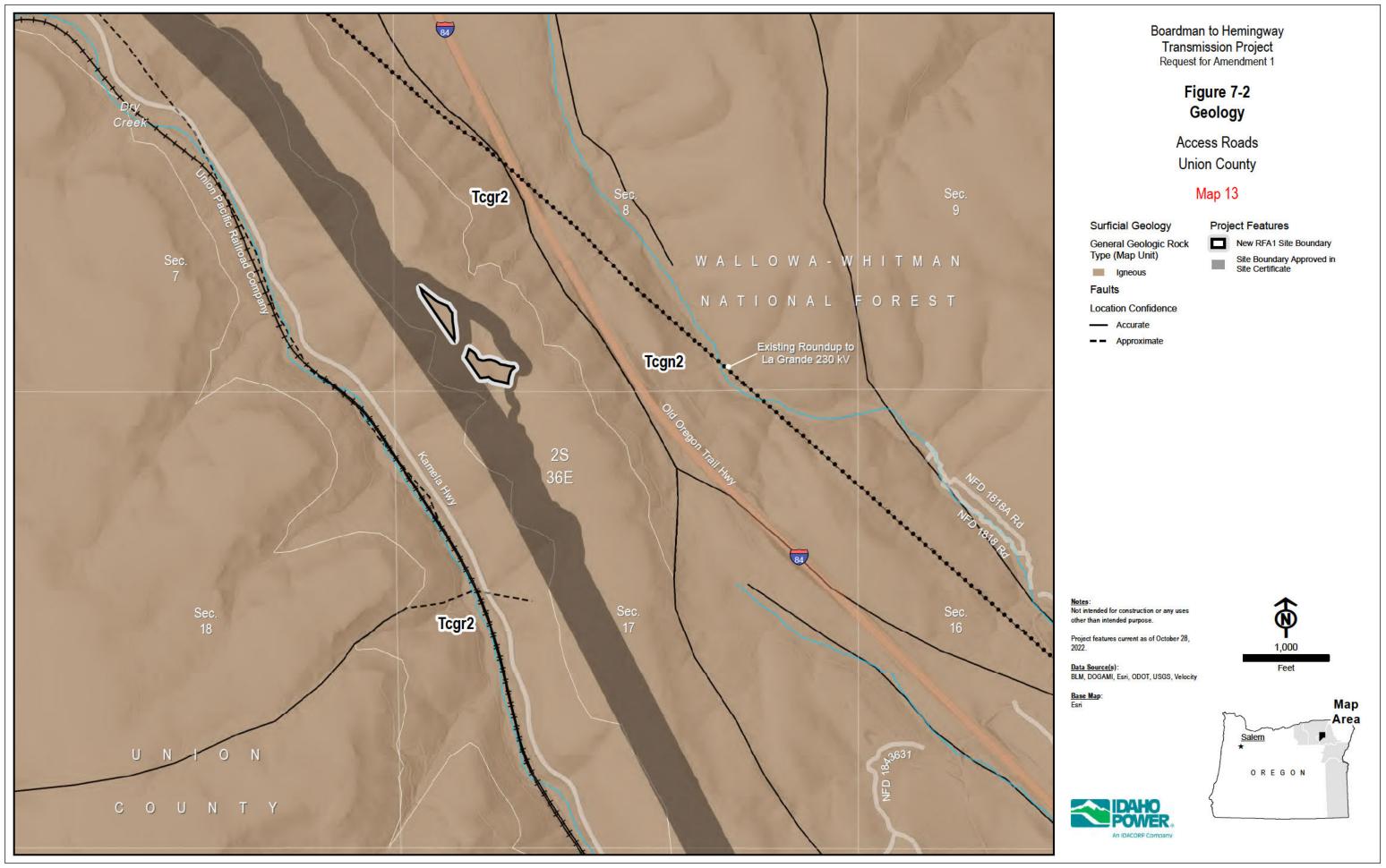


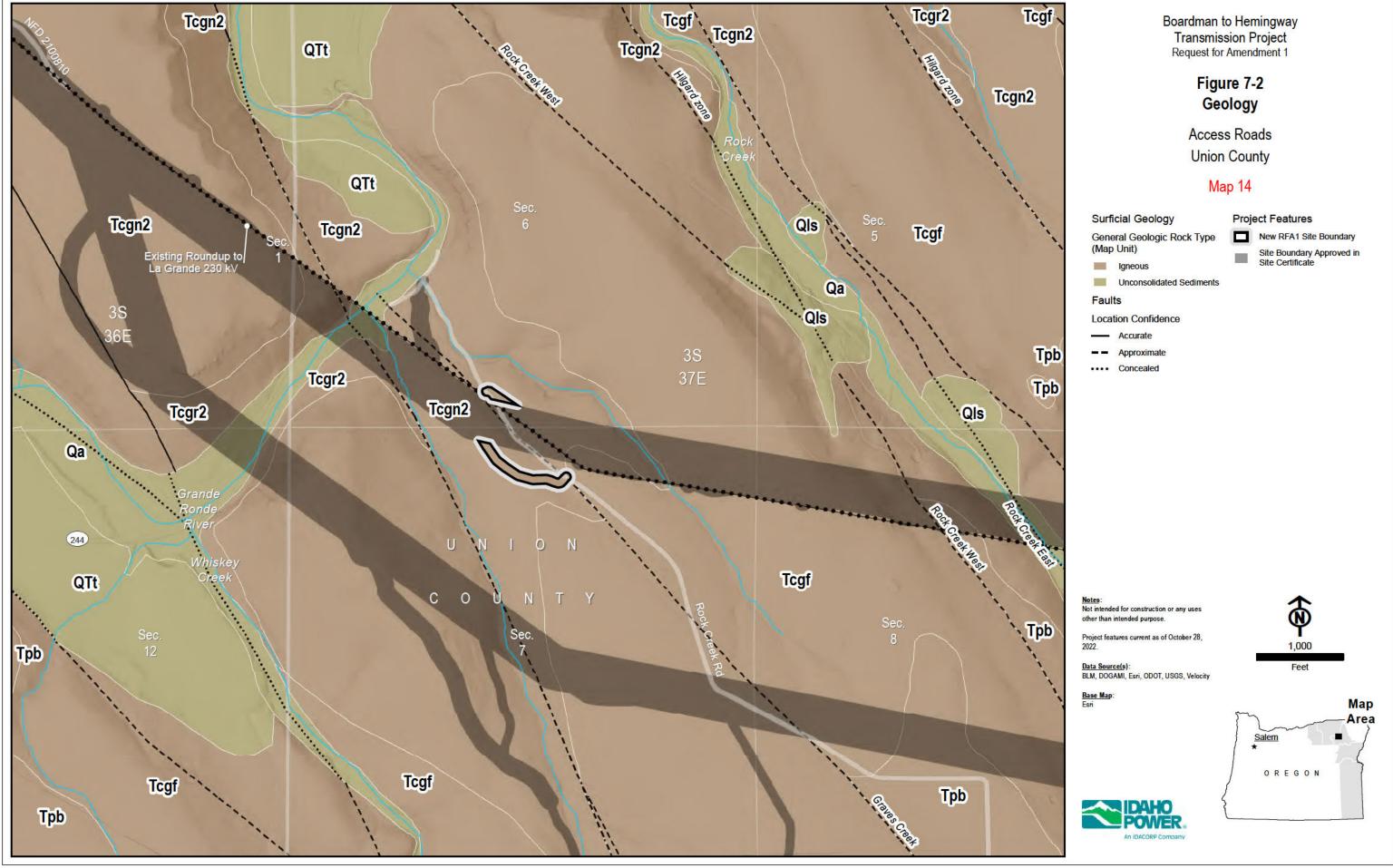


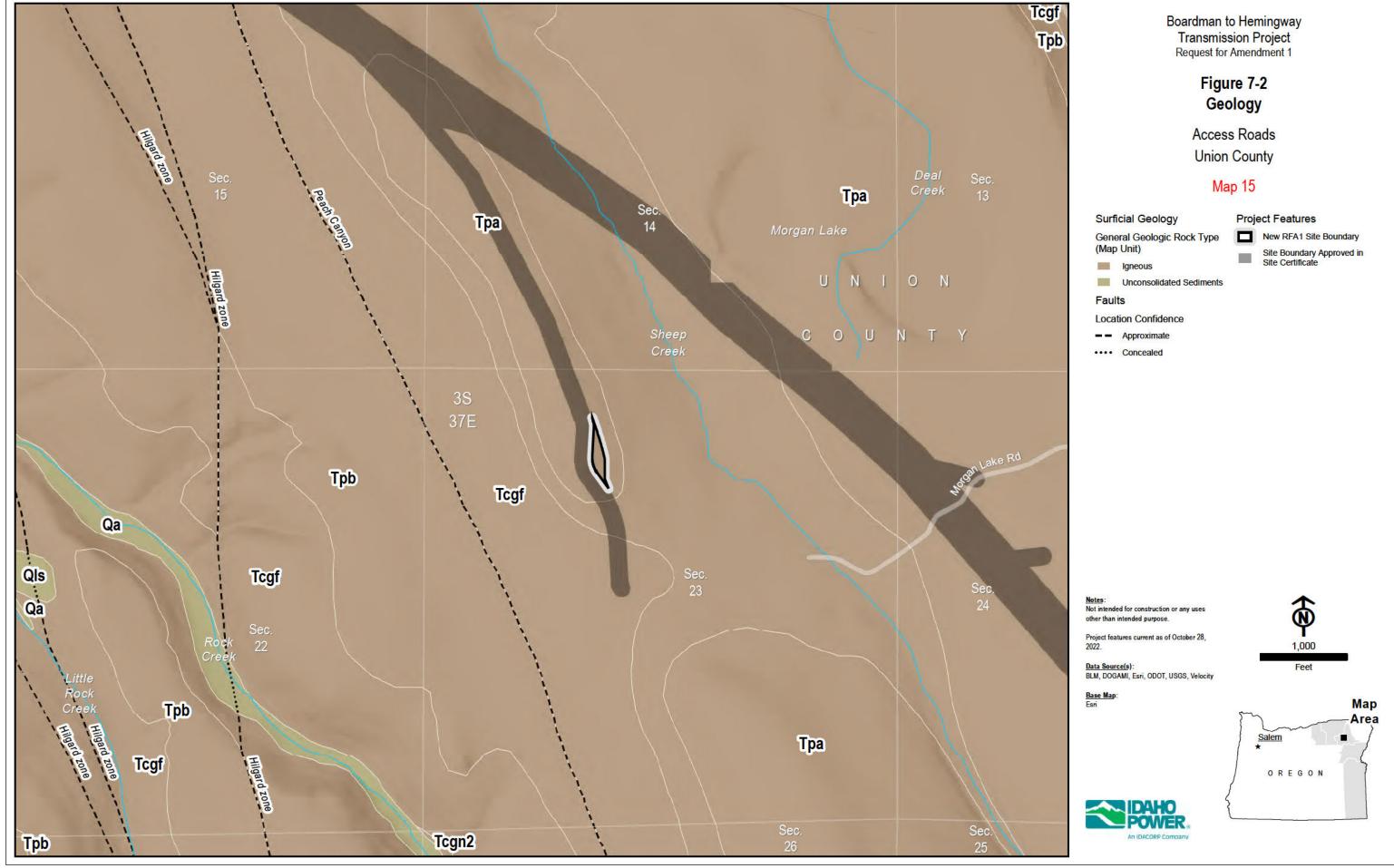


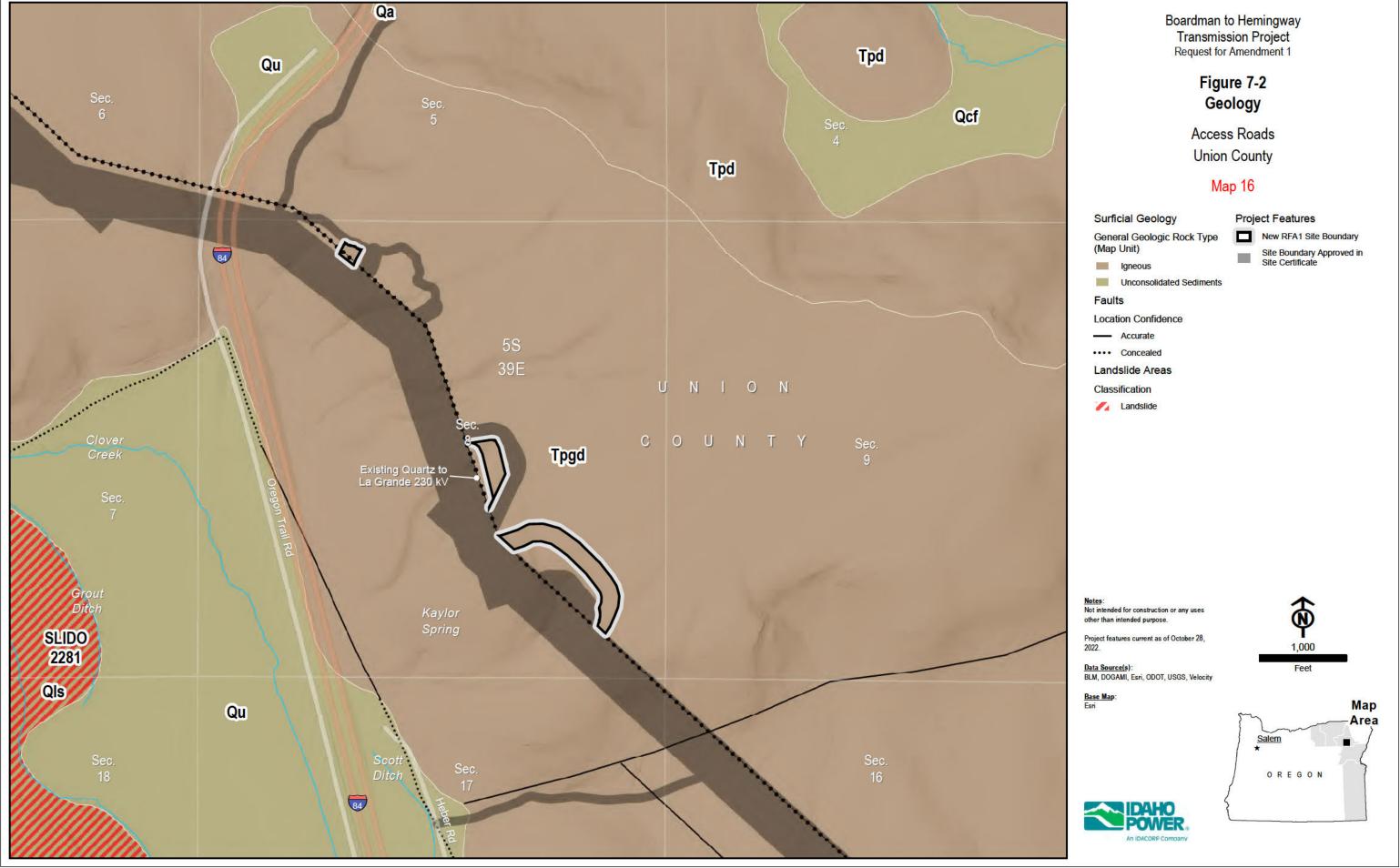


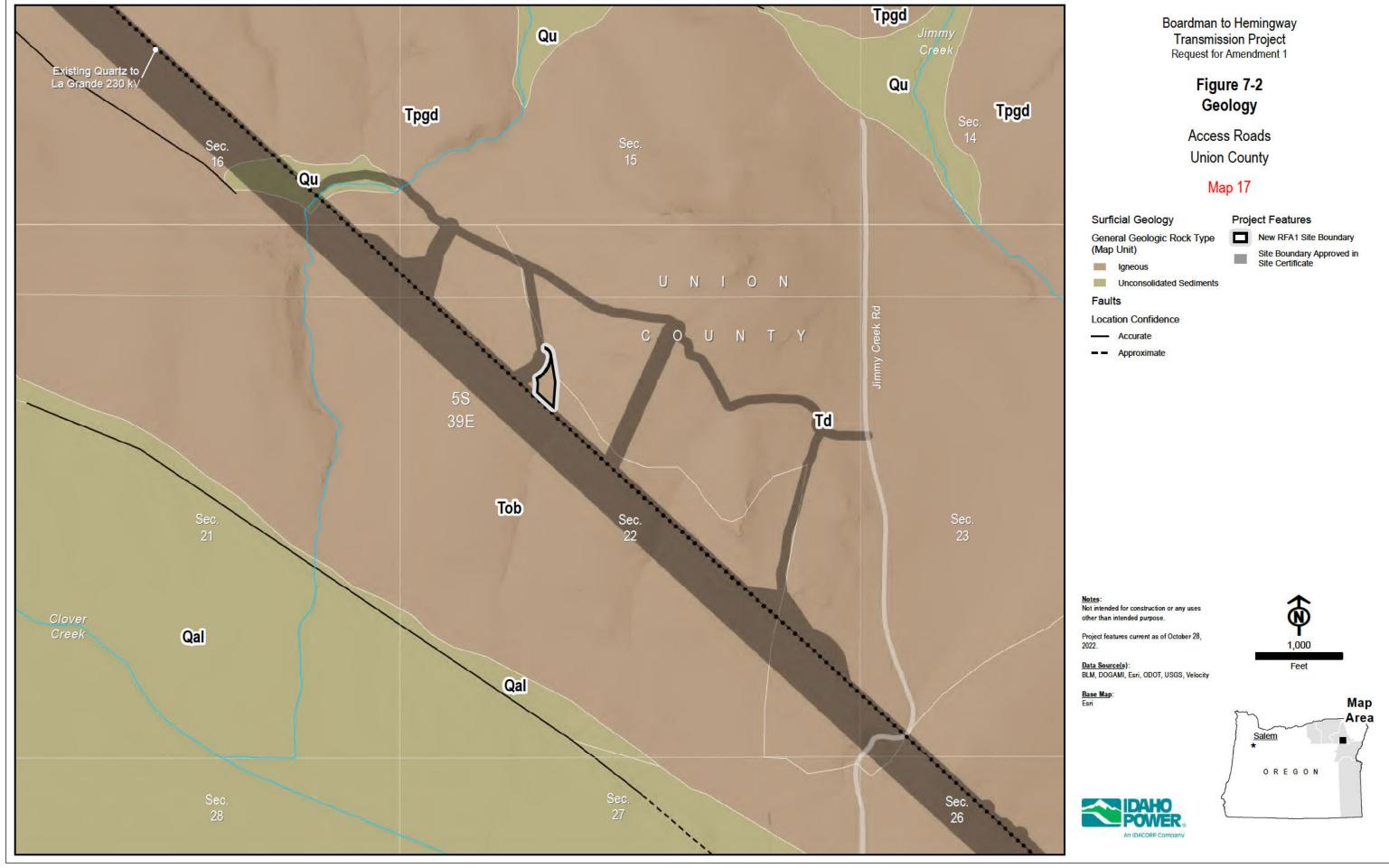


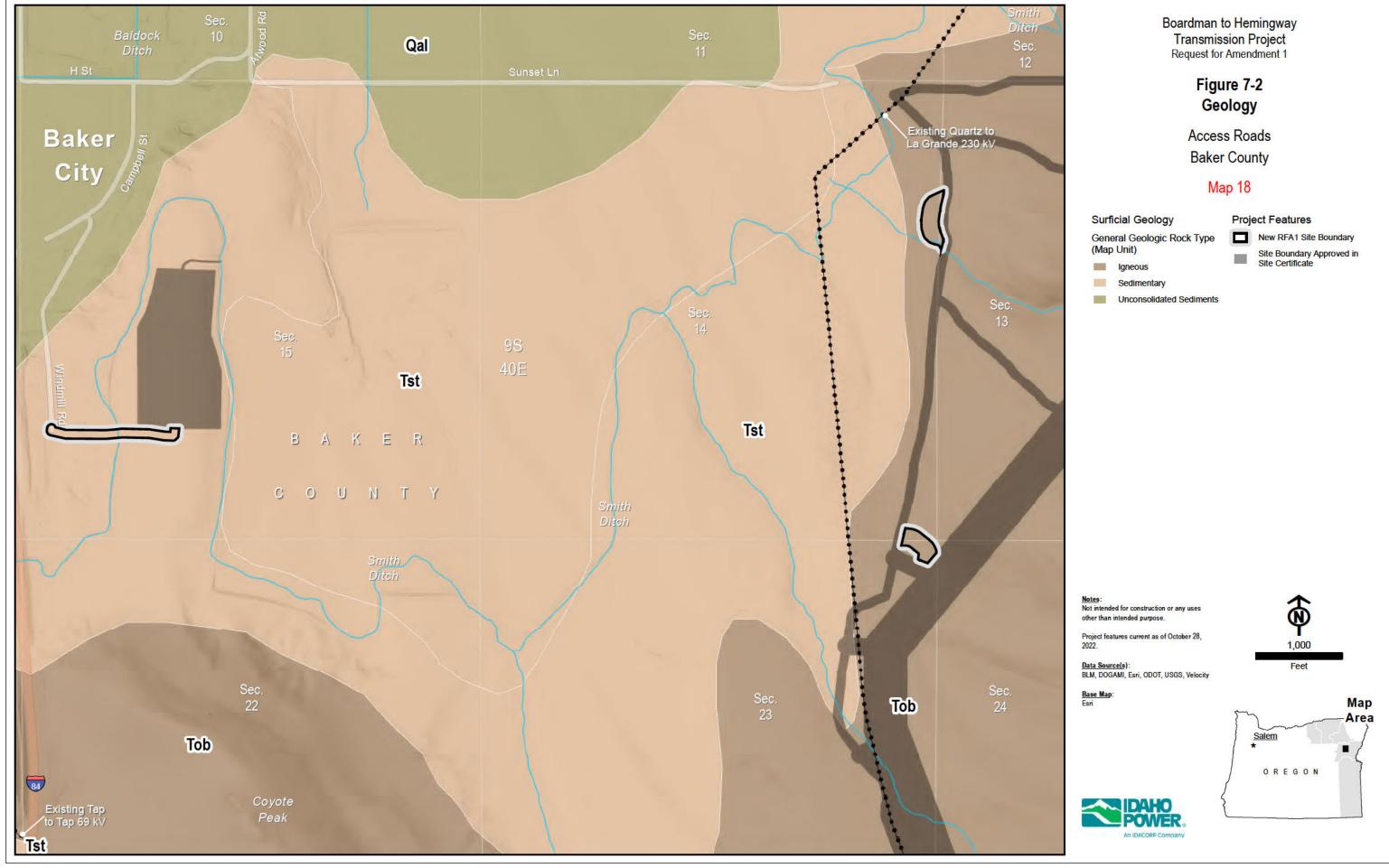


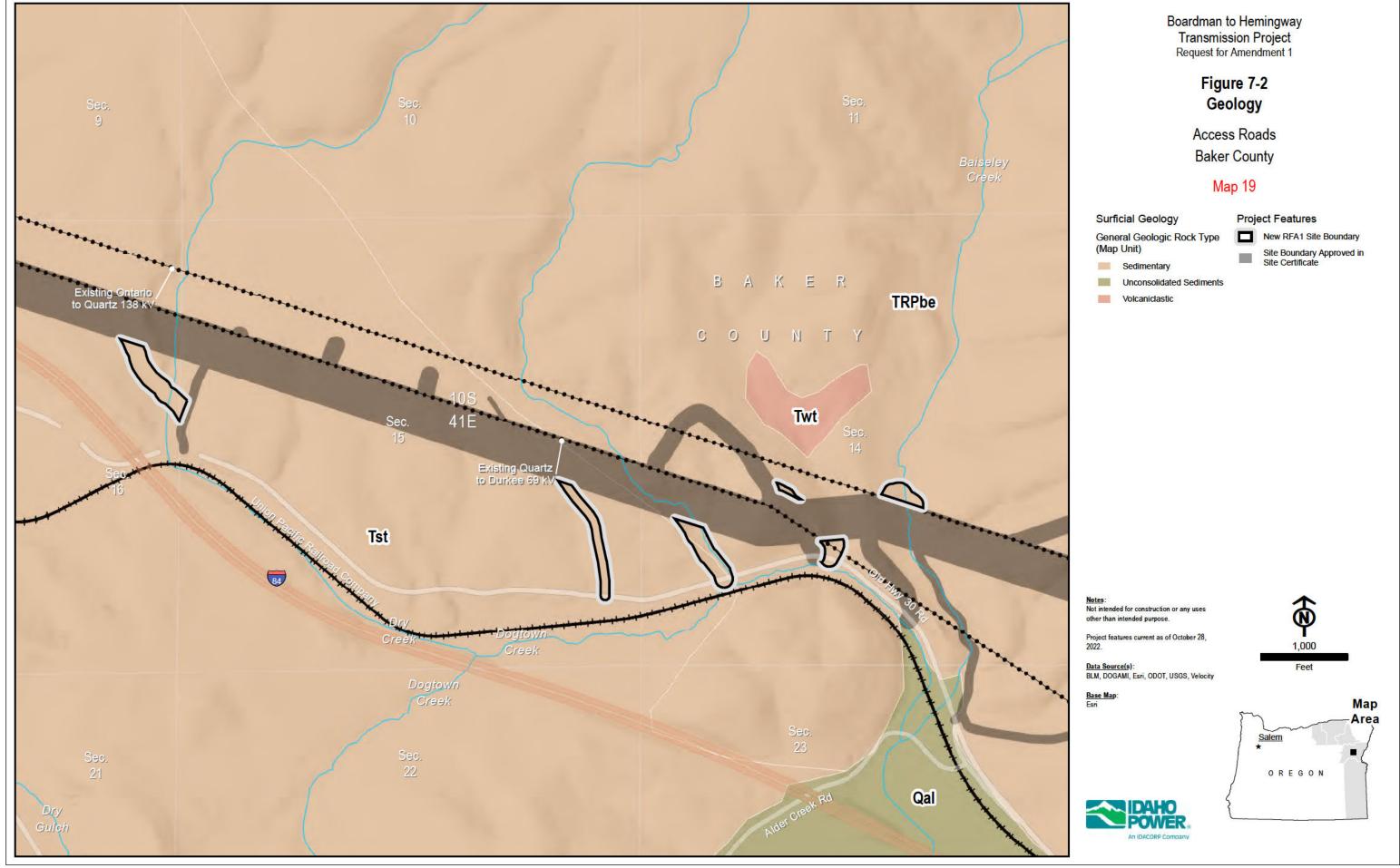


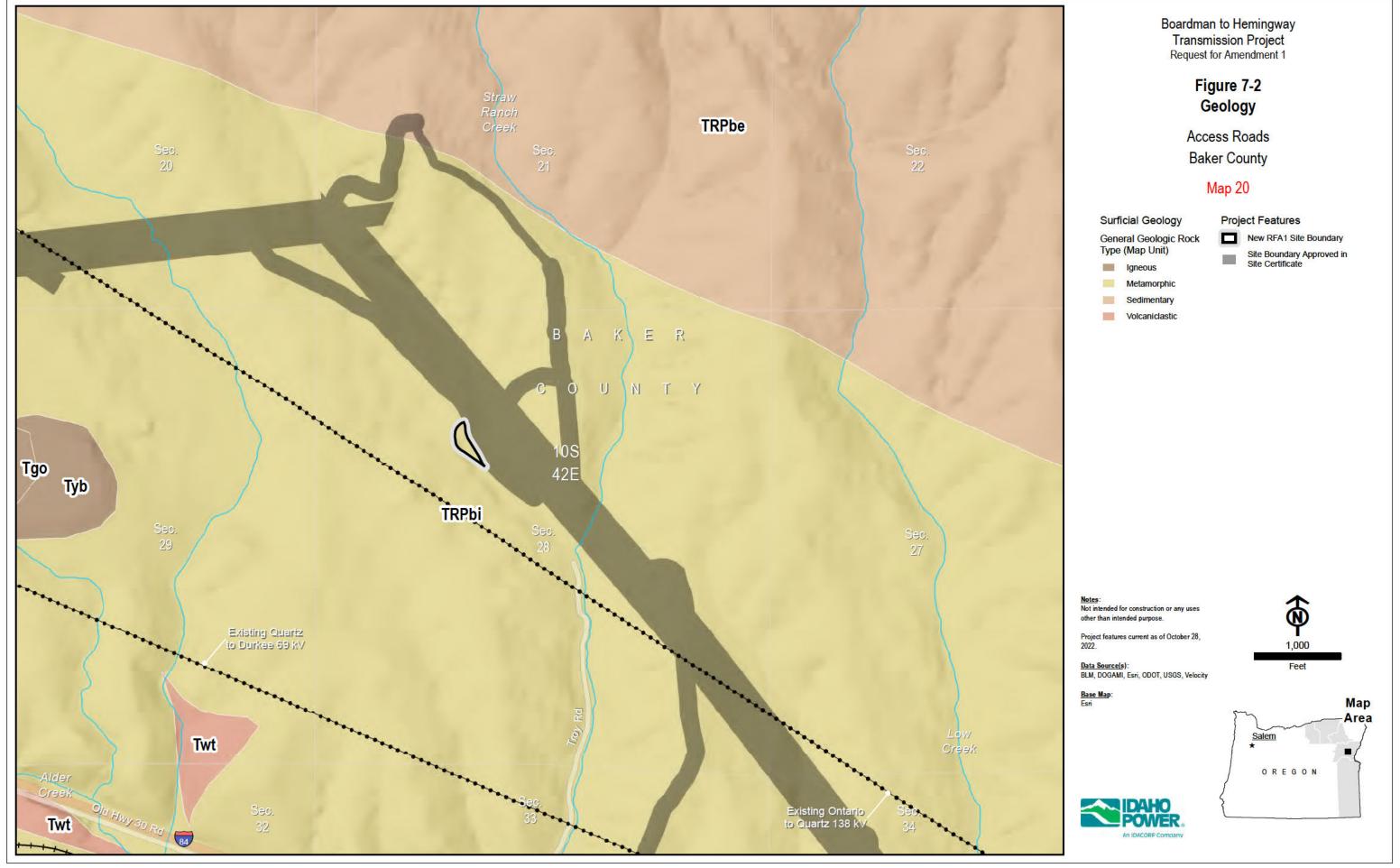


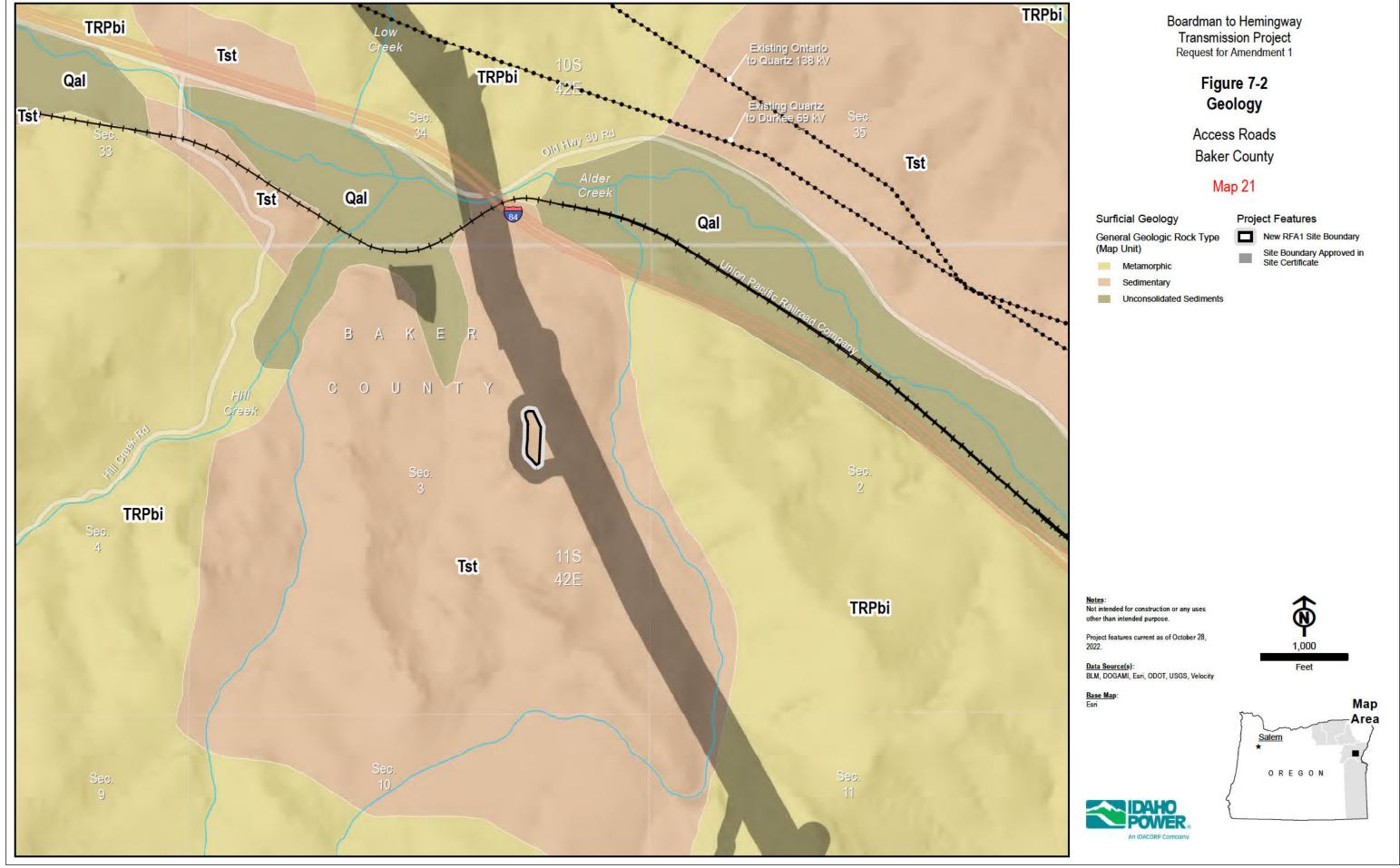


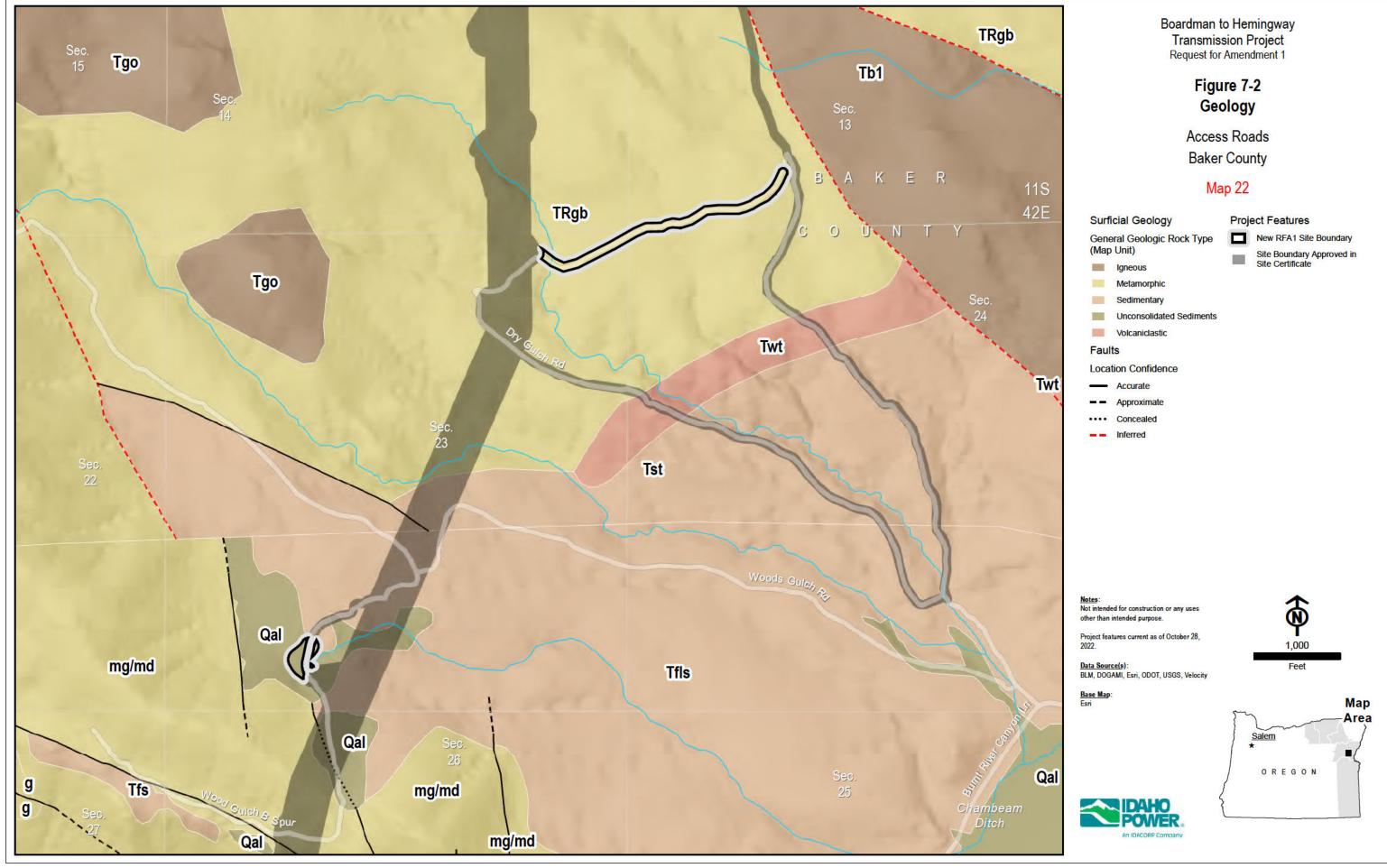


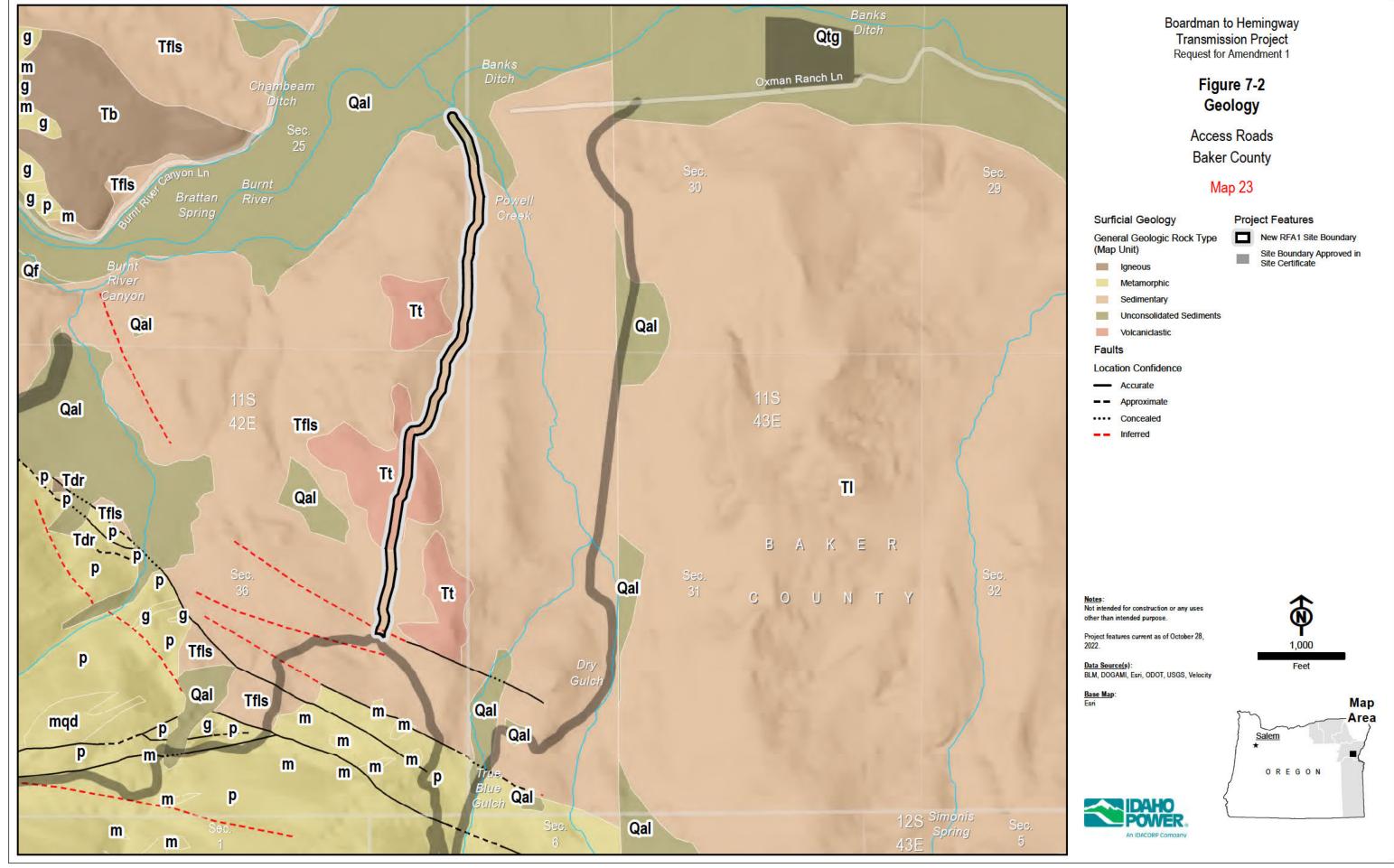


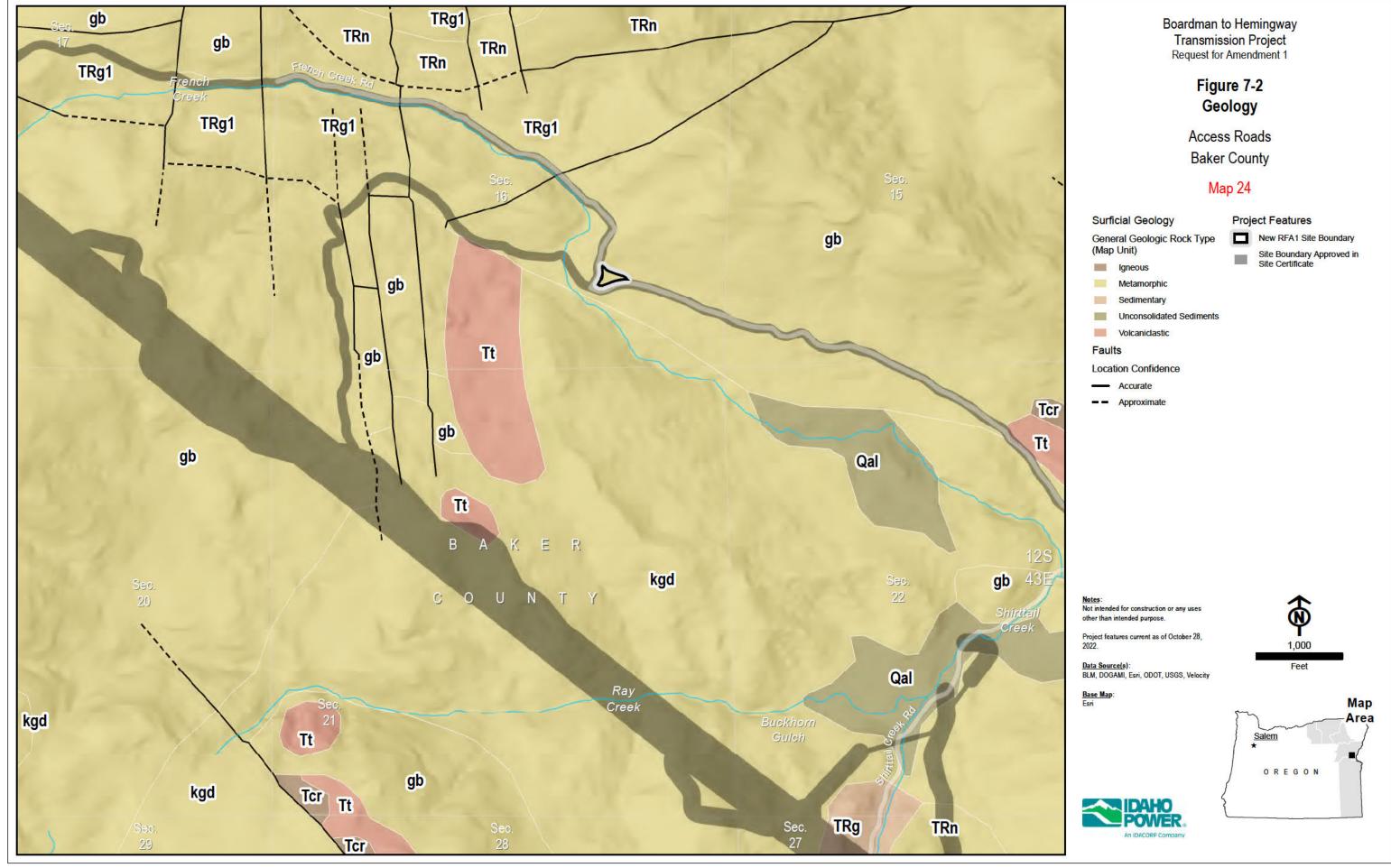


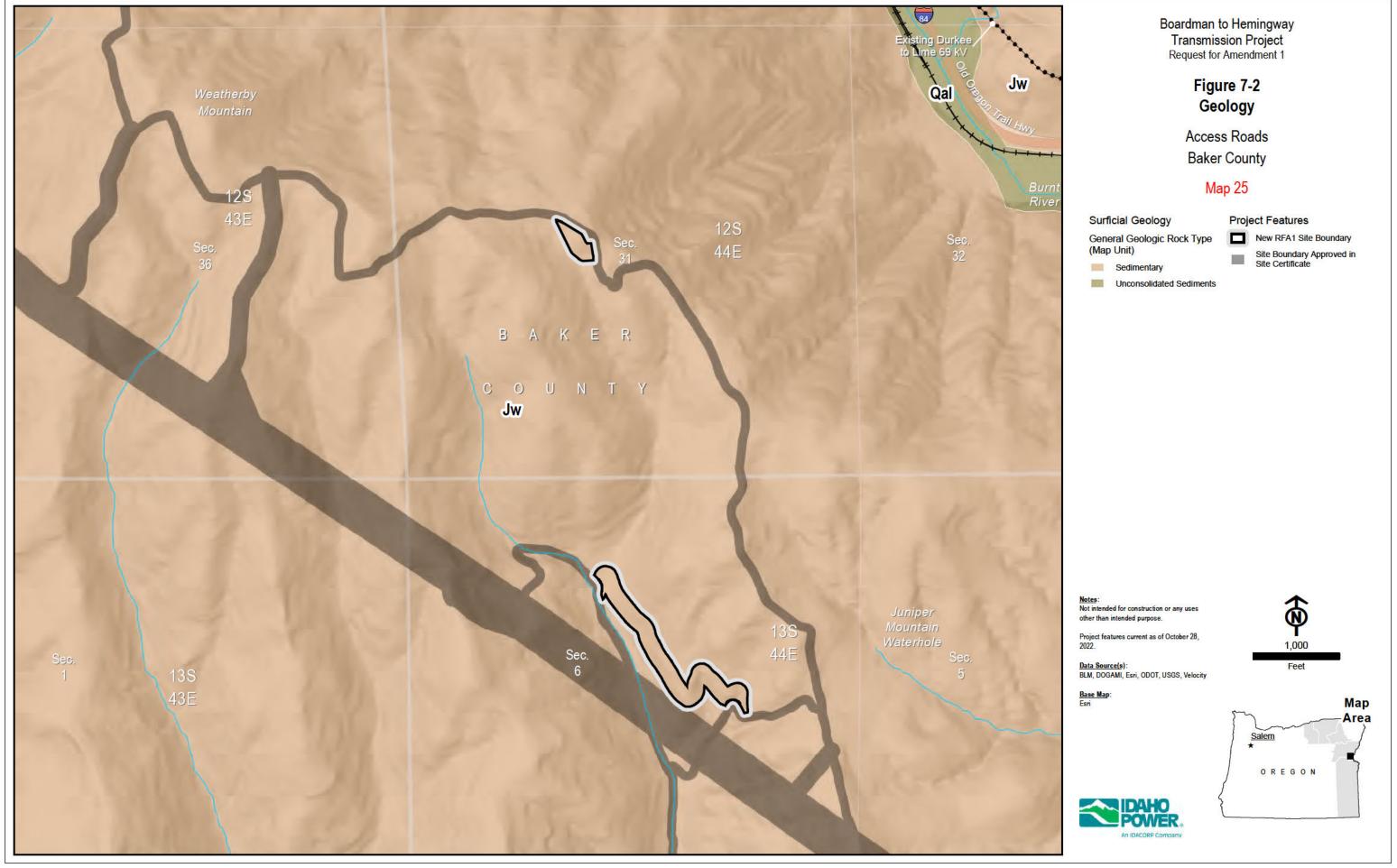


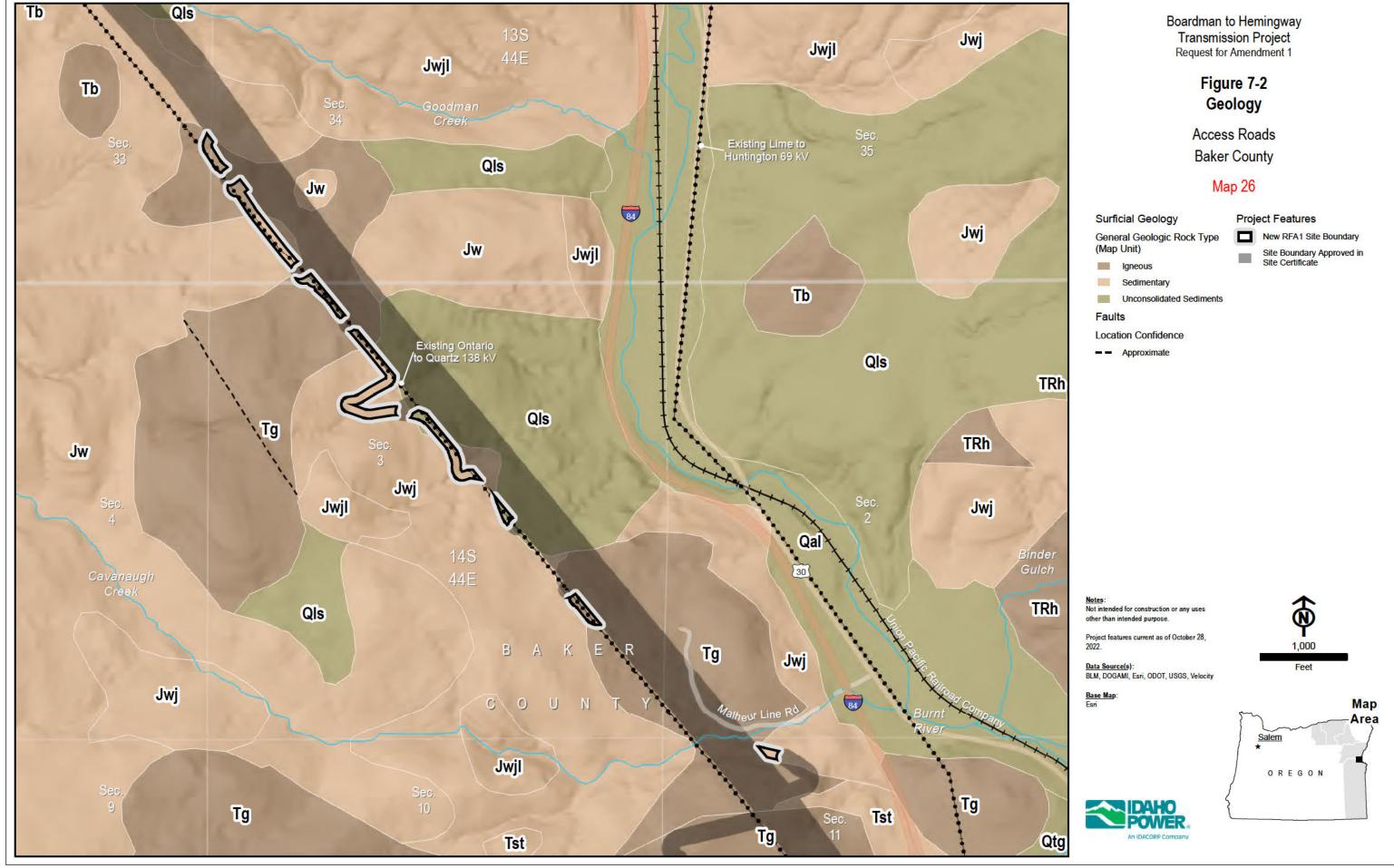


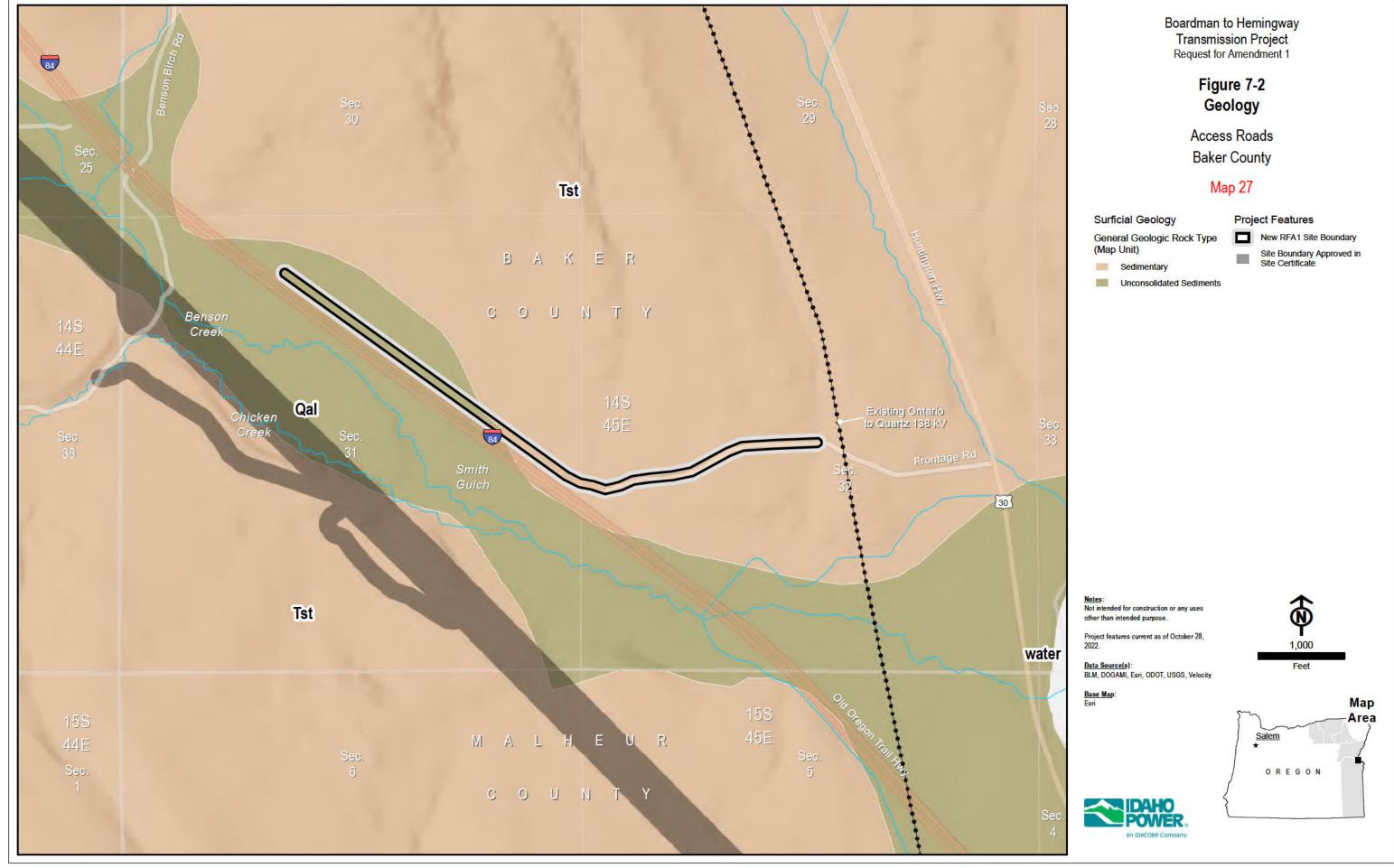


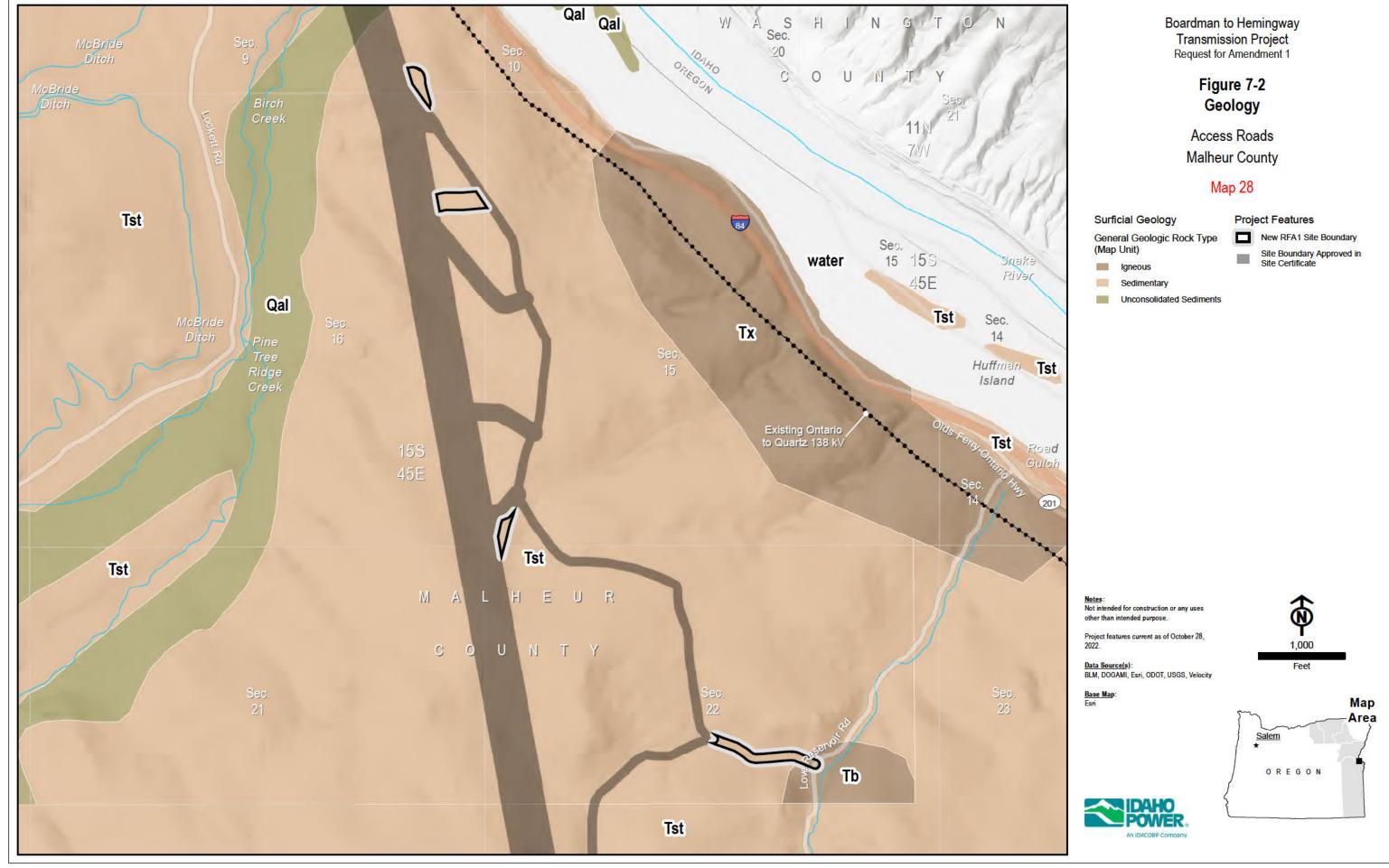


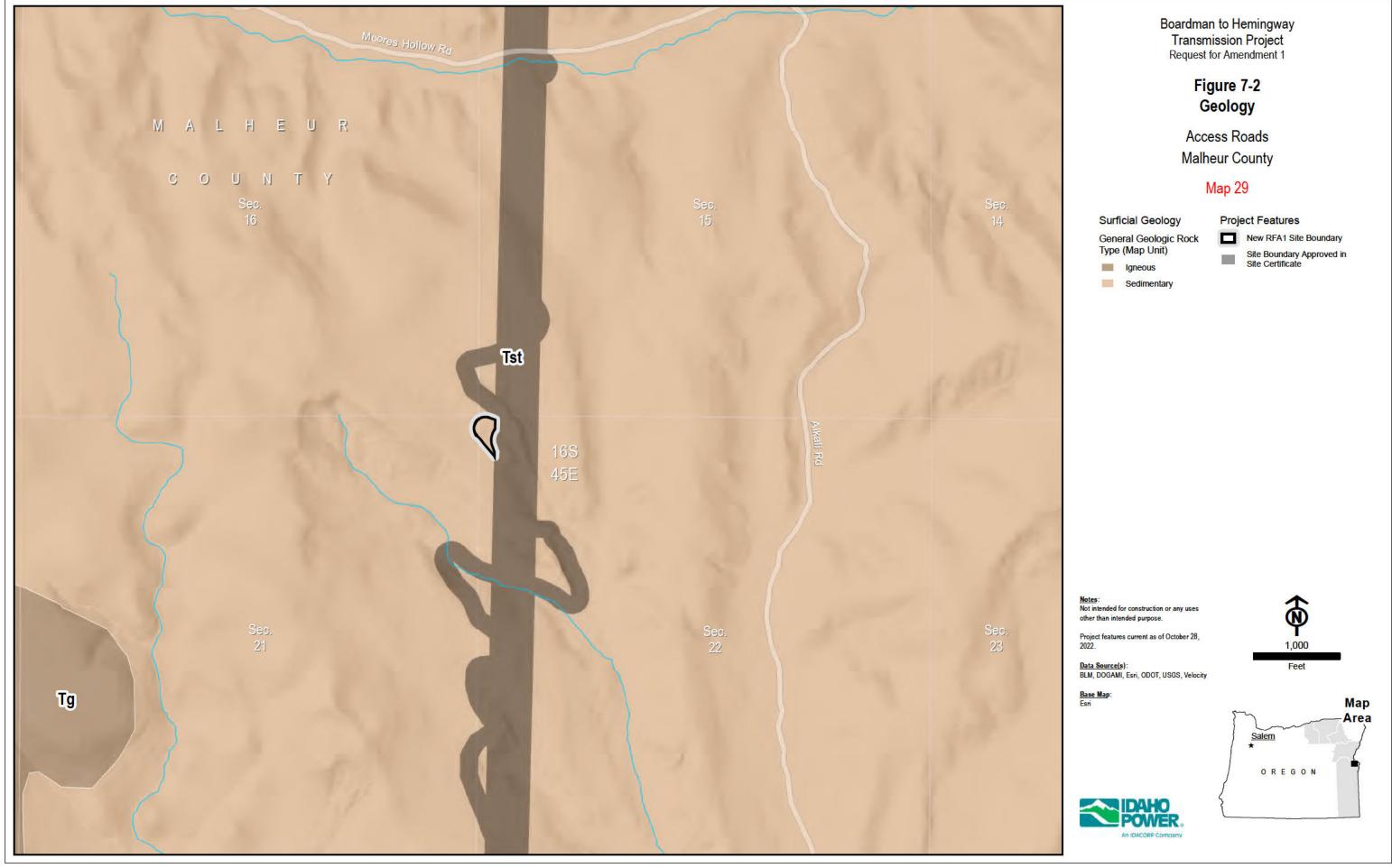


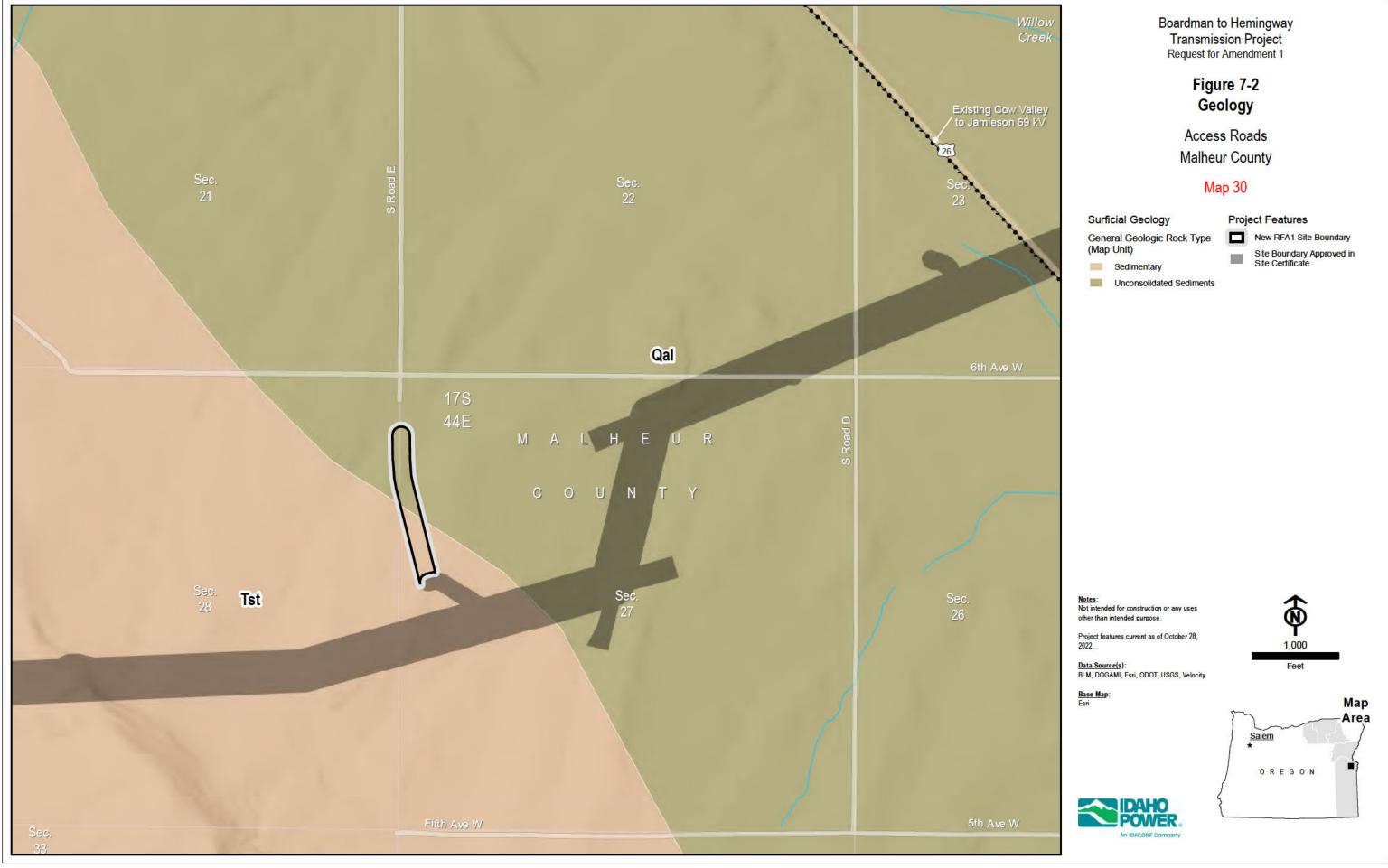


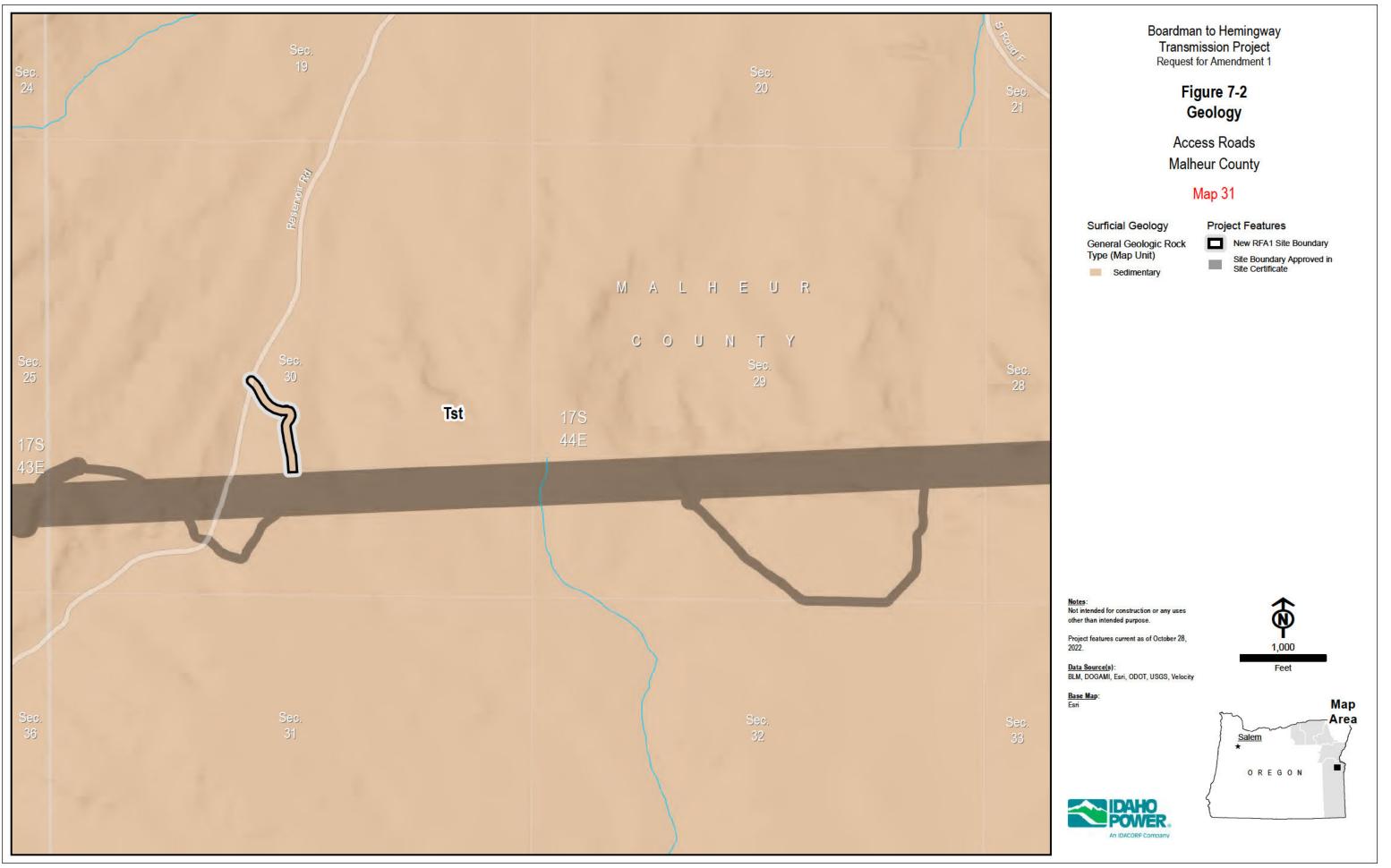


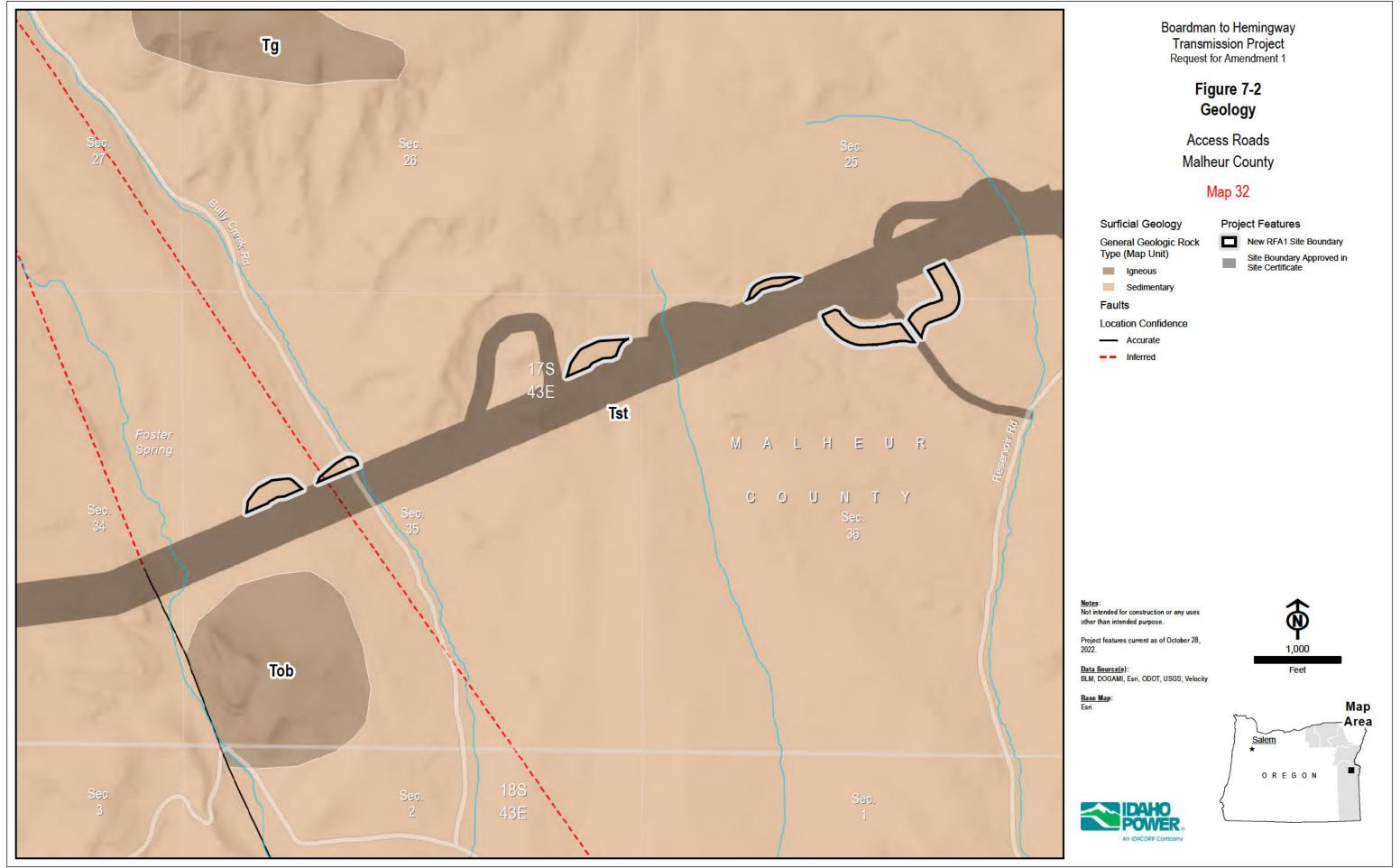


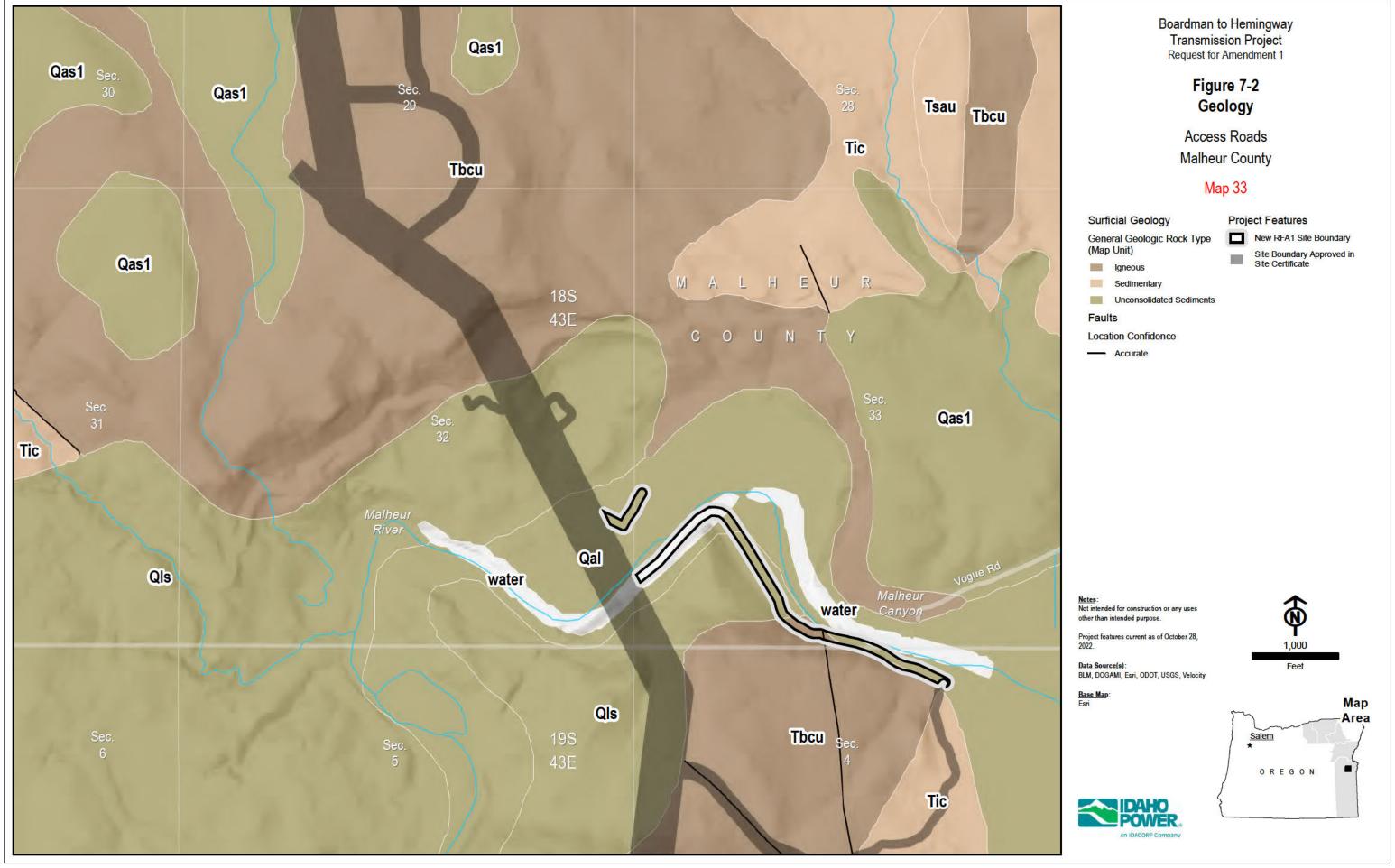


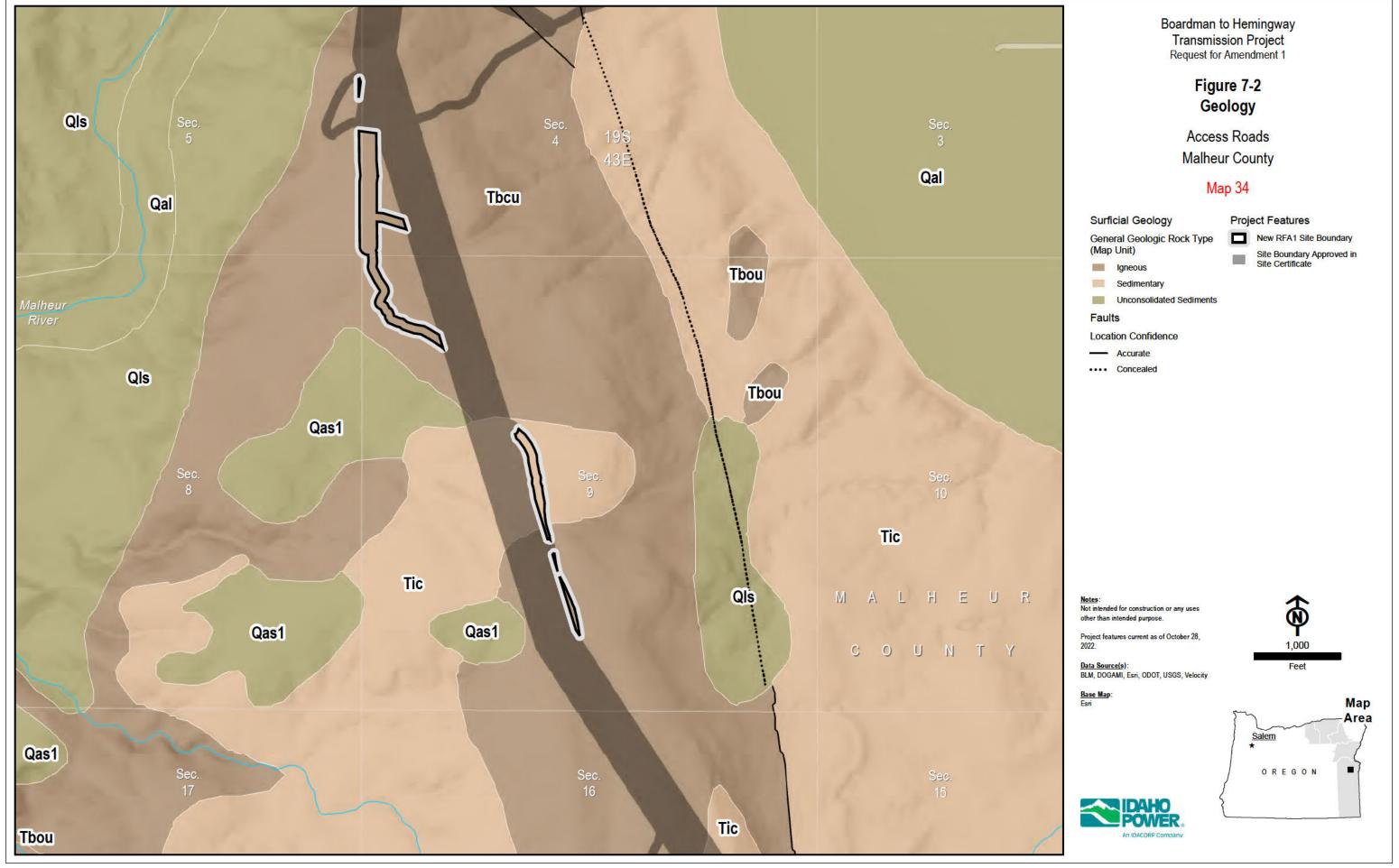


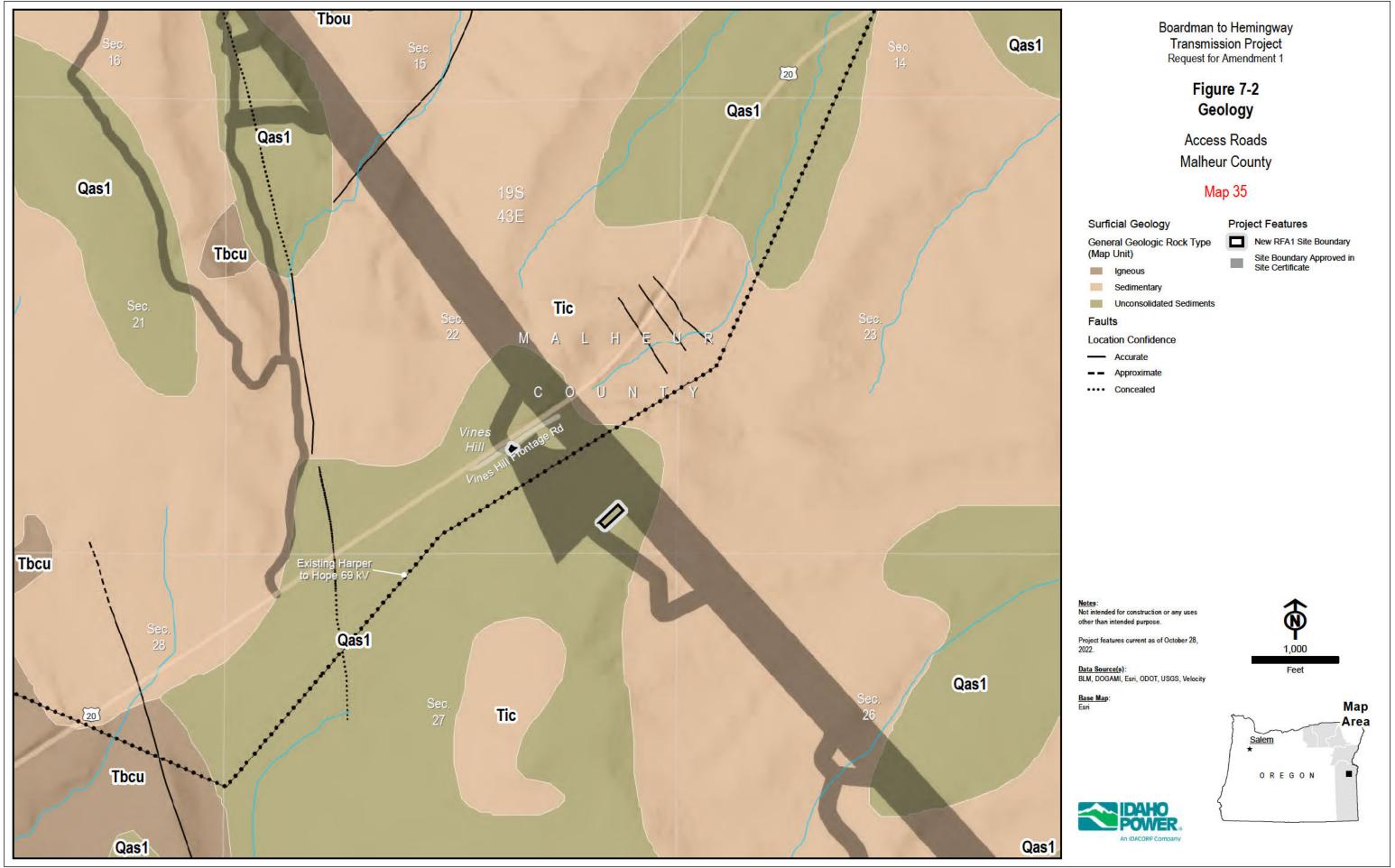


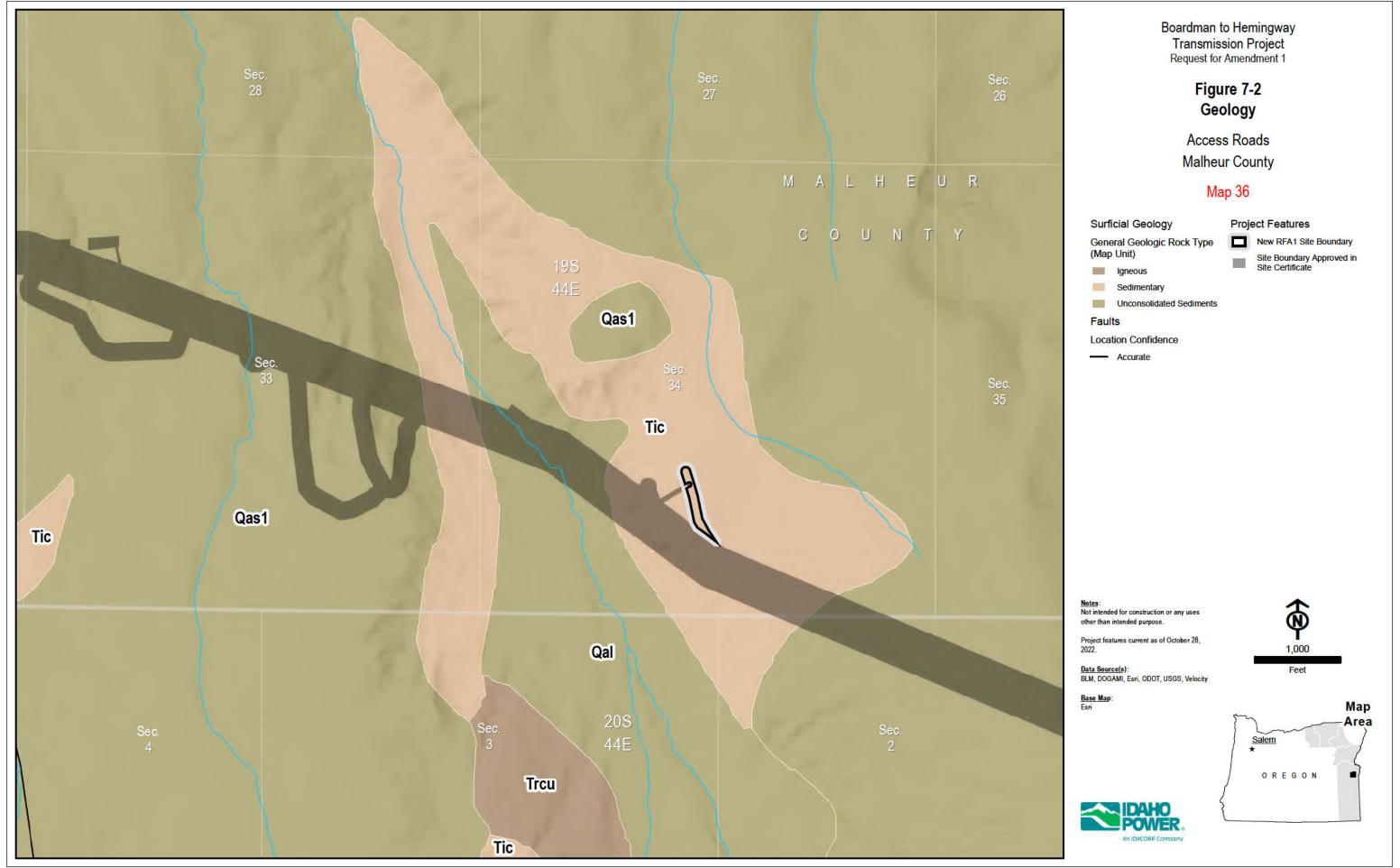


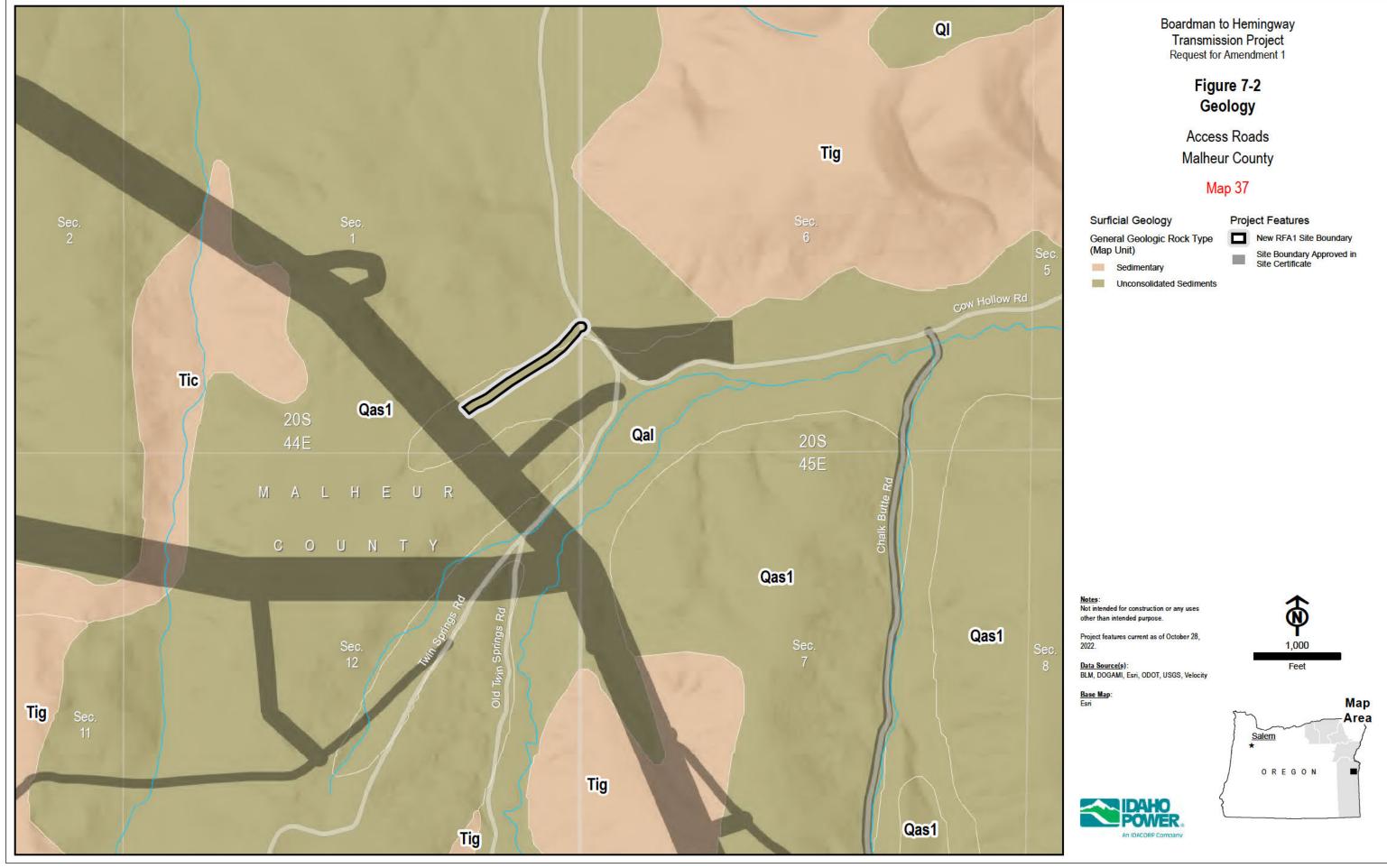


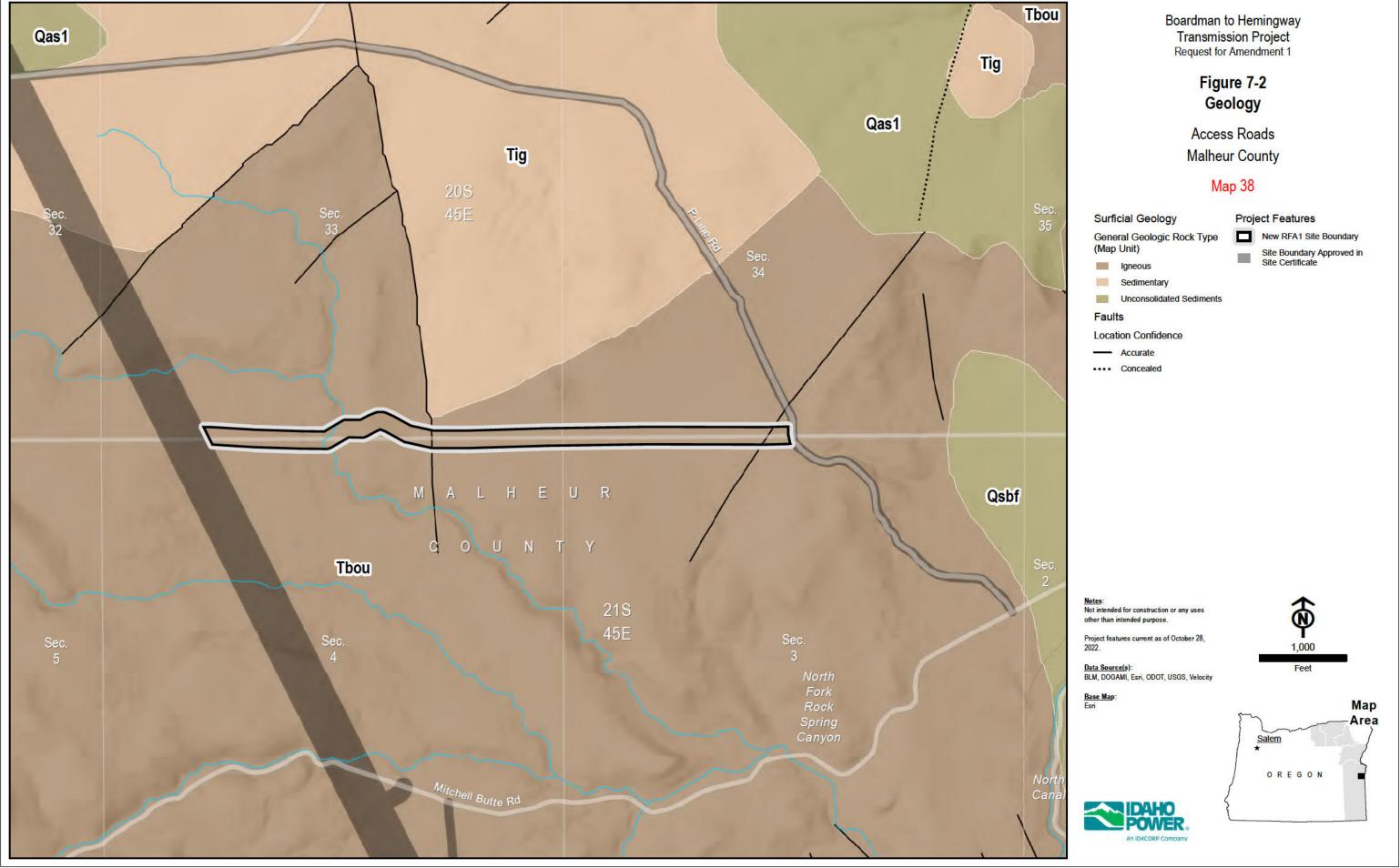


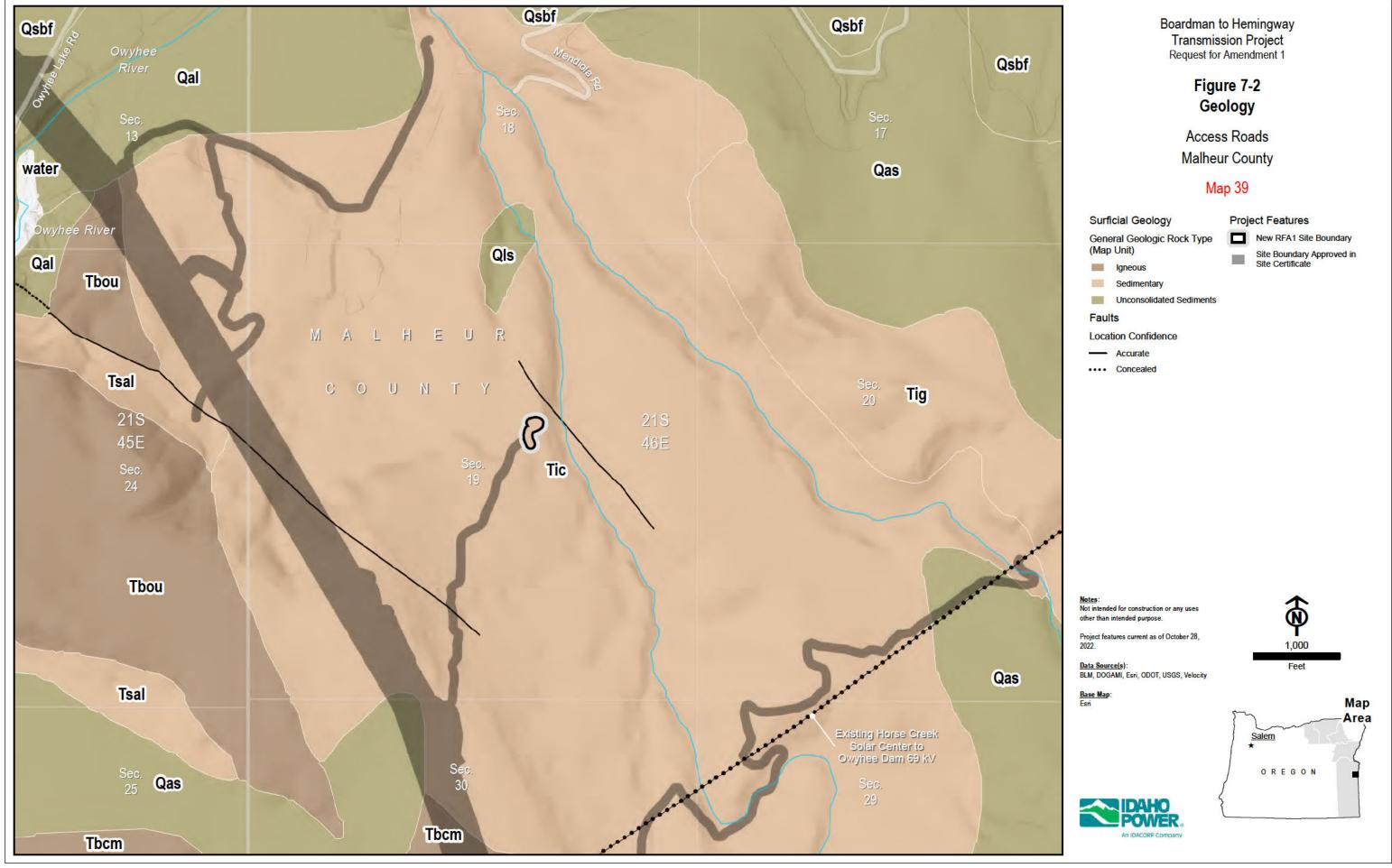


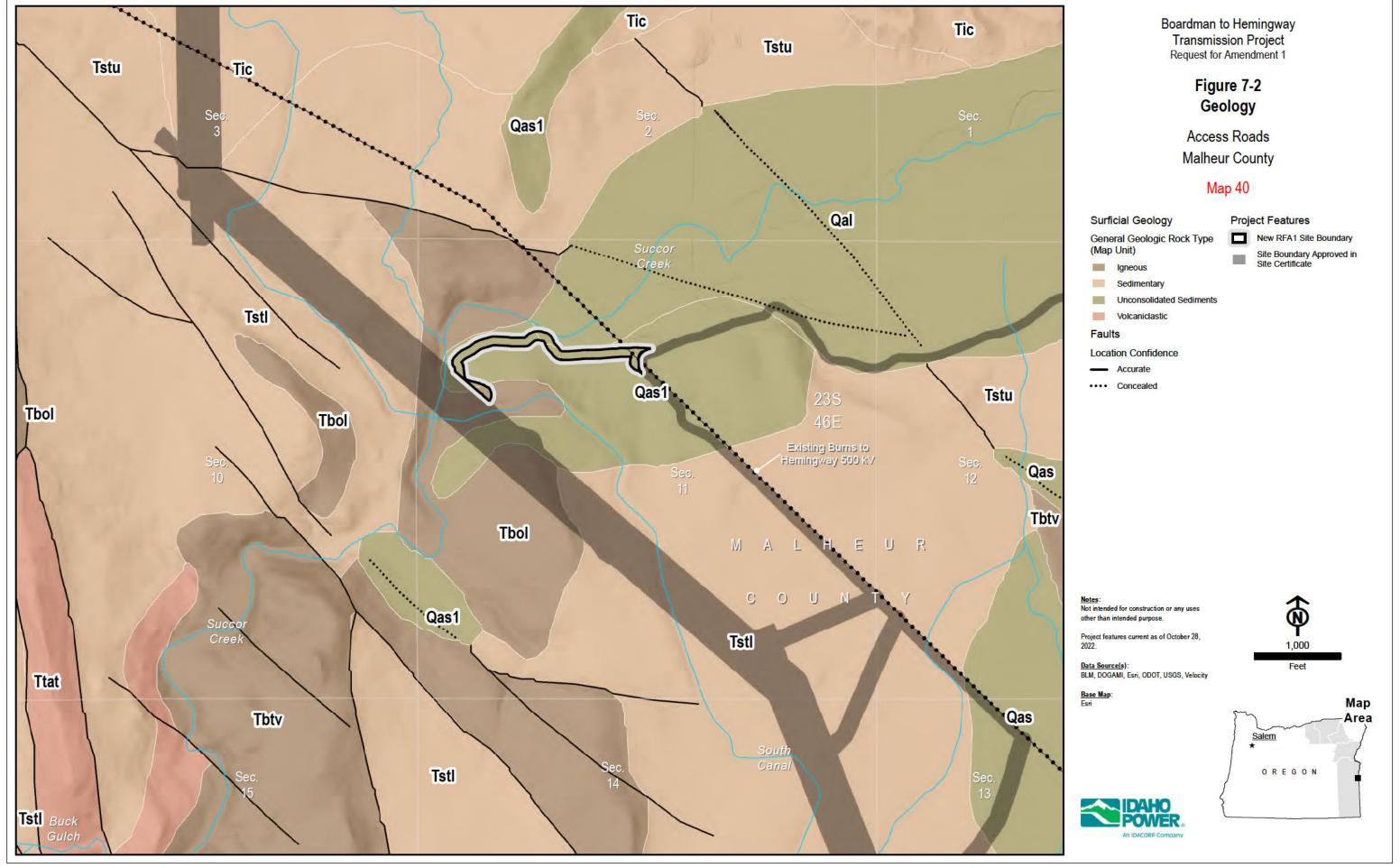


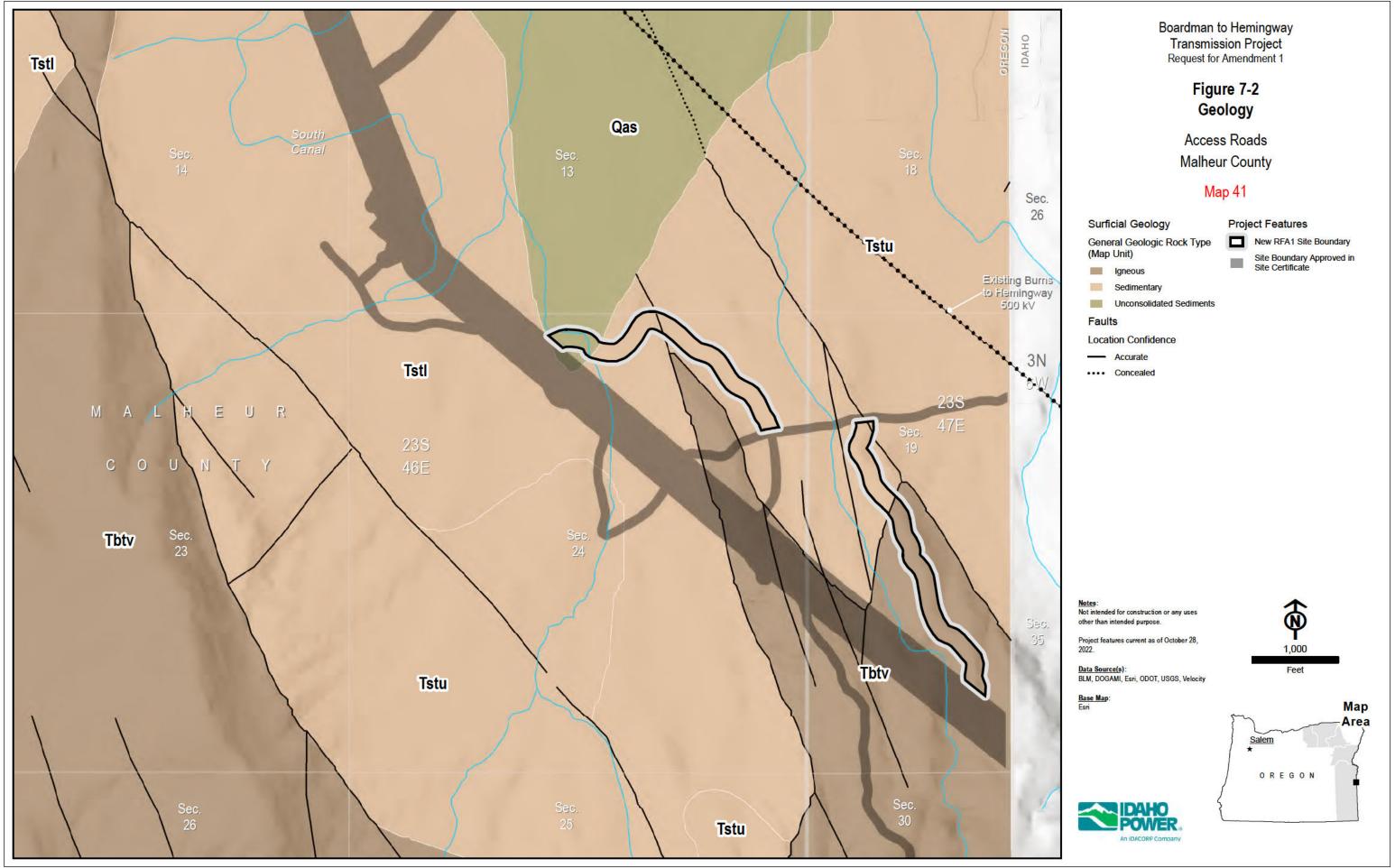


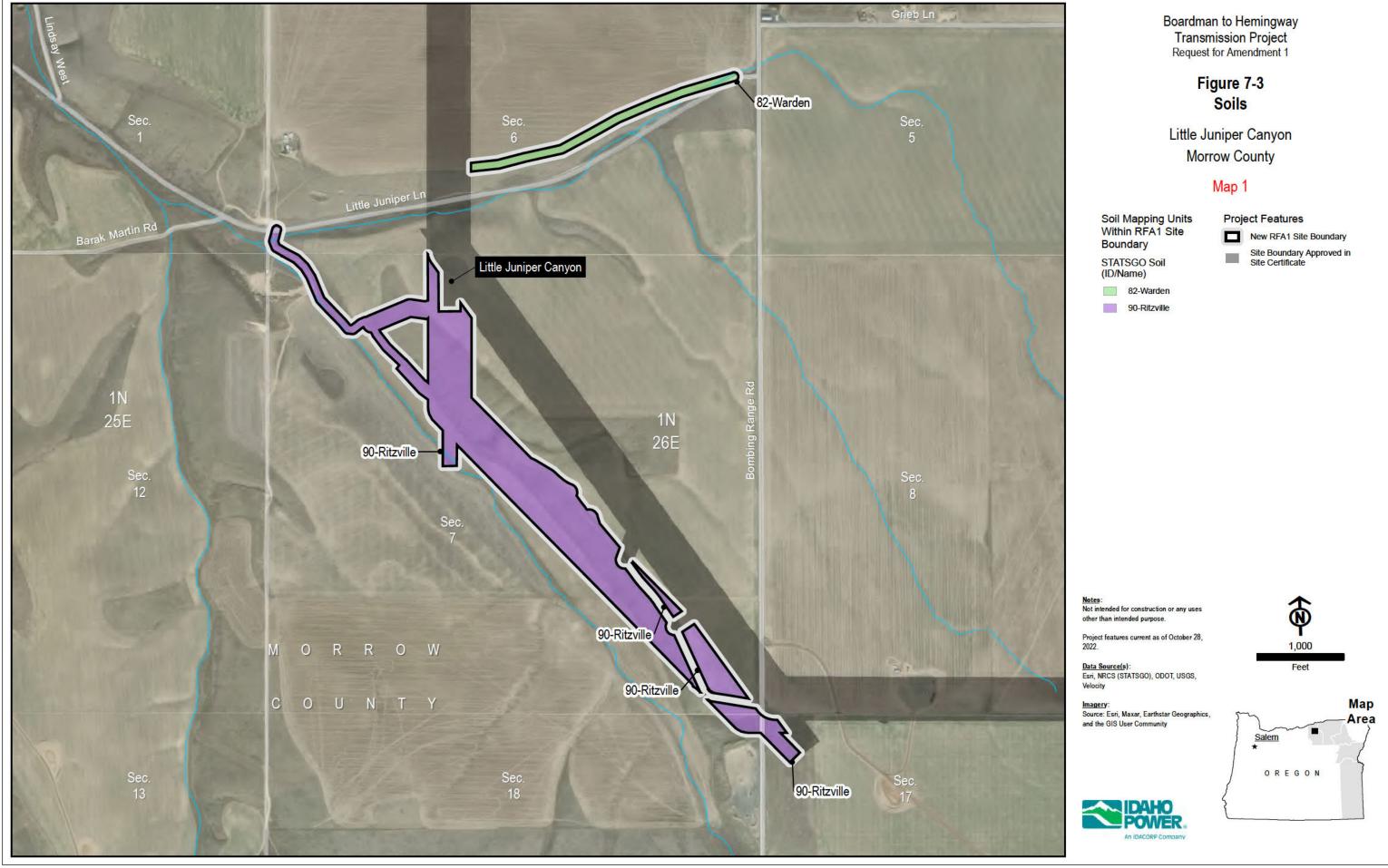


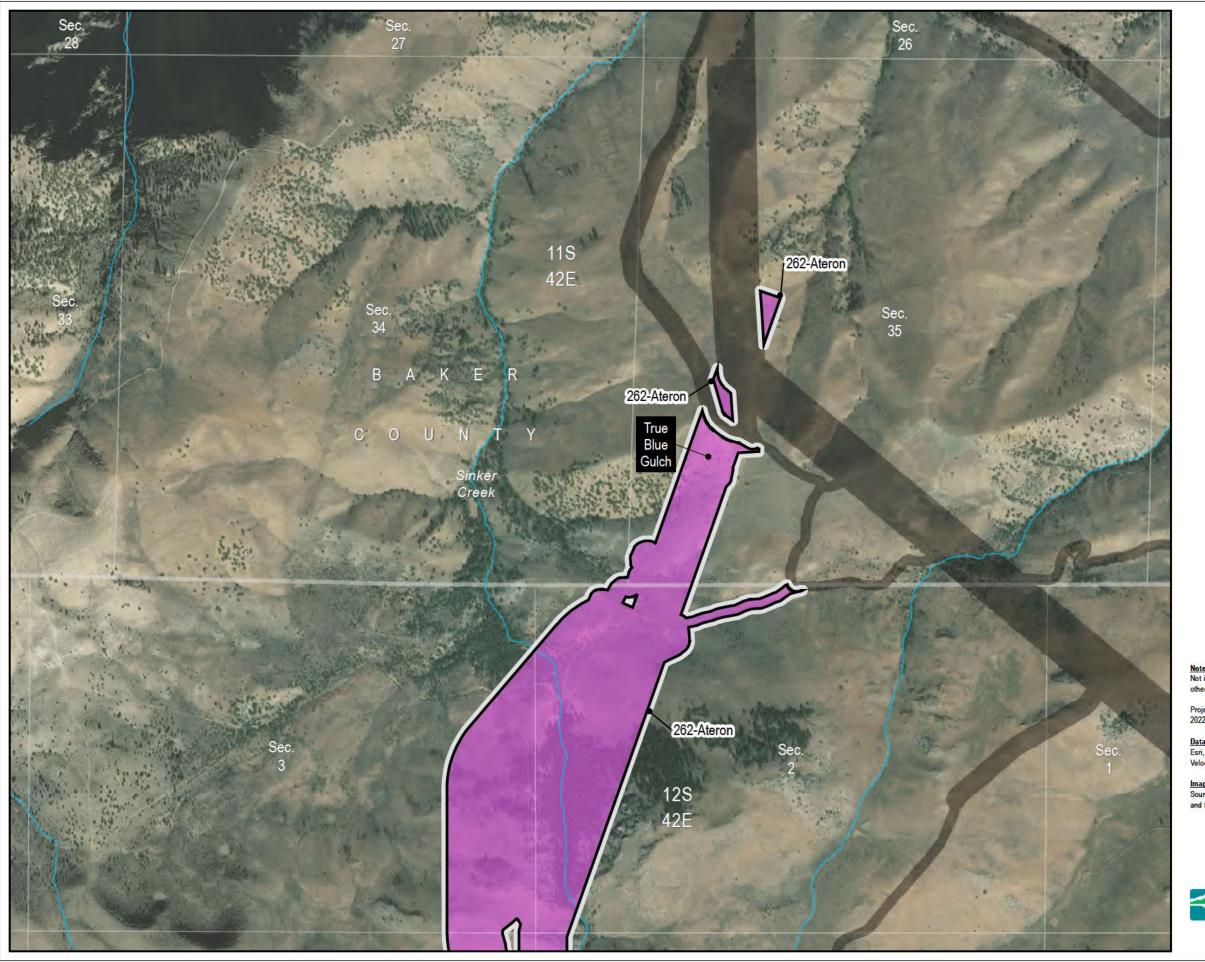












Boardman to Hemingway Transmission Project
Request for Amendment 1

Figure 7-3 Soils

True Blue Gulch **Baker County** 

Map 2

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

262-Ateron

**Project Features** 

New RFA1 Site Boundary

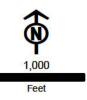
Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

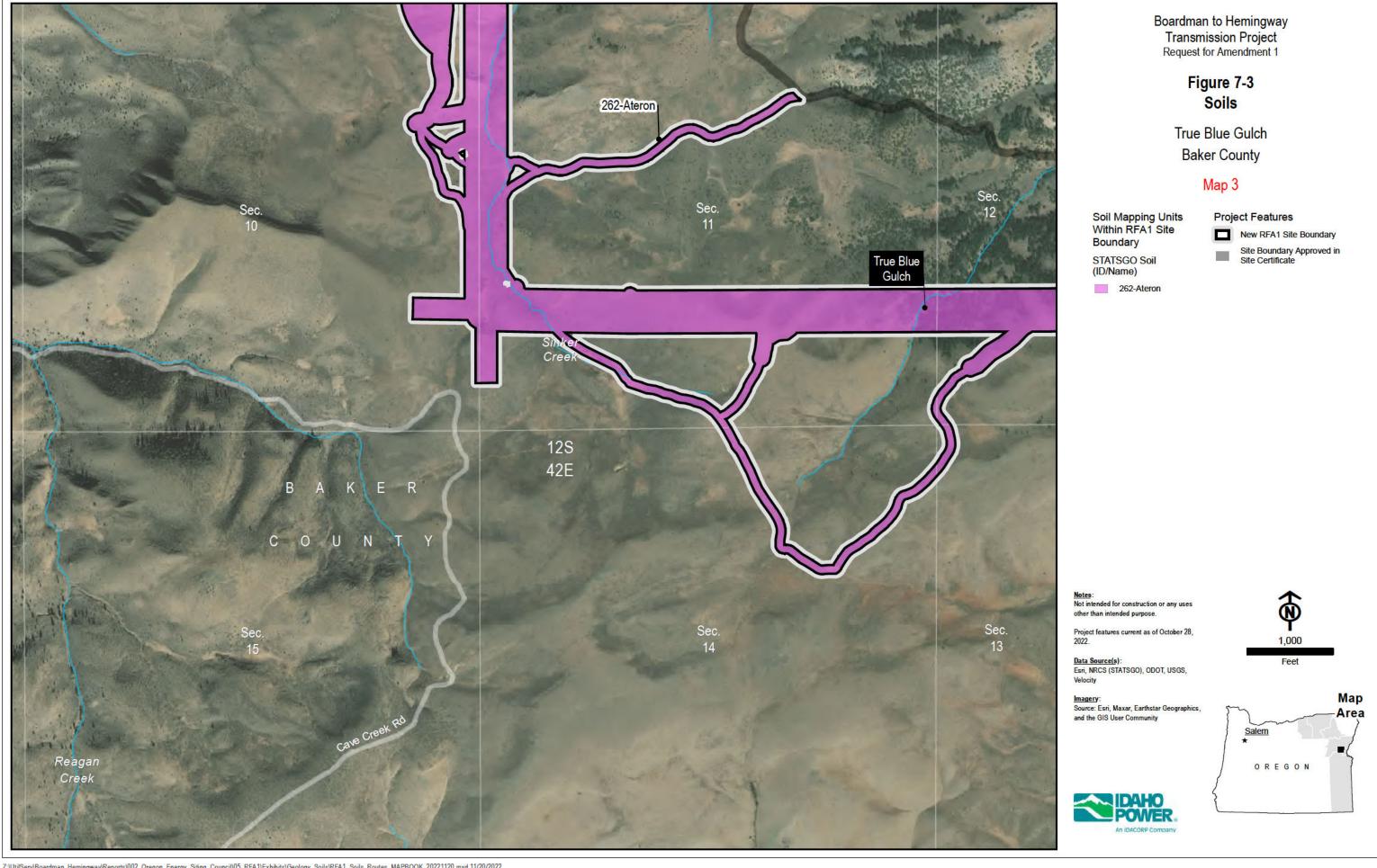
Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

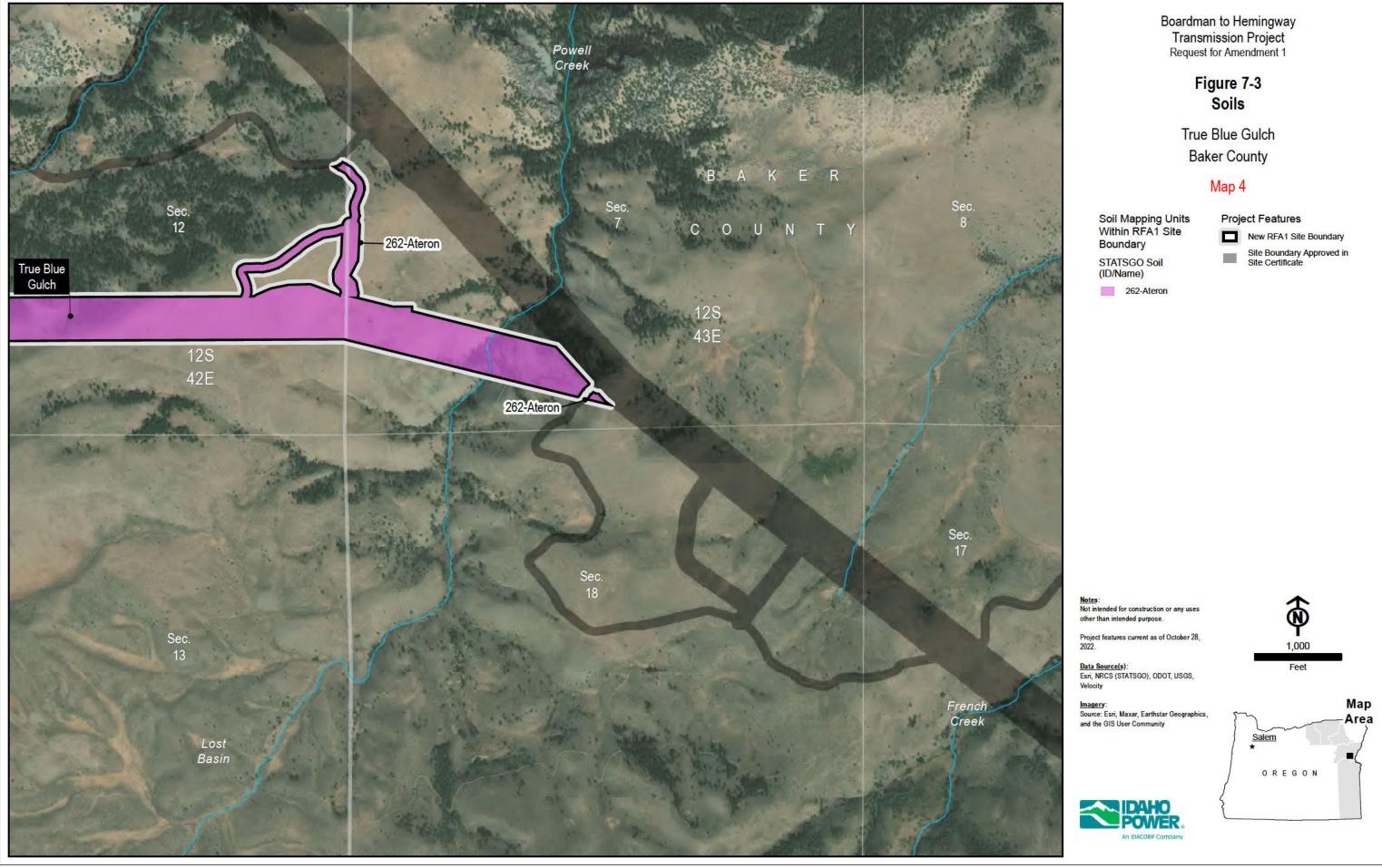
Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

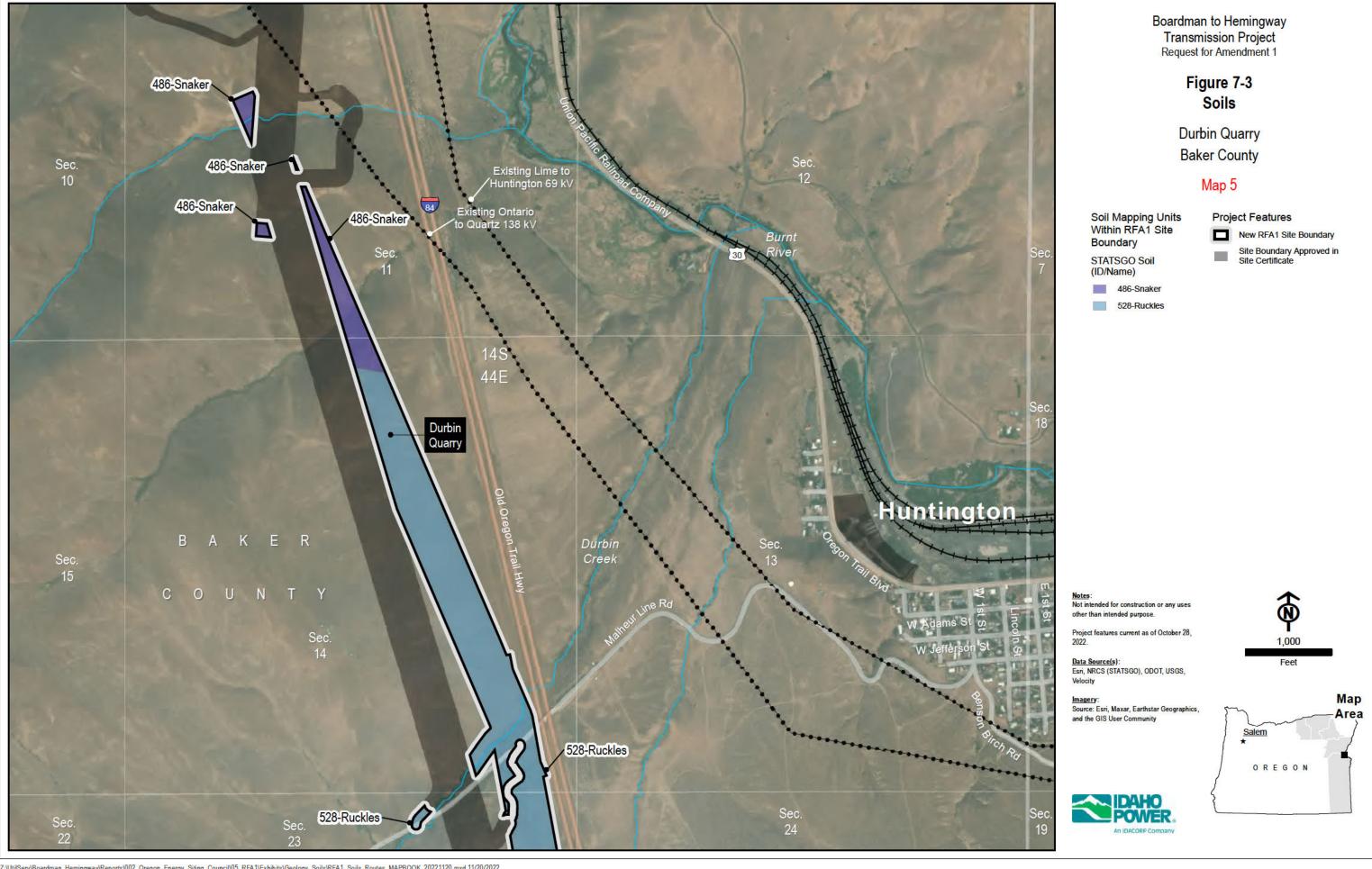


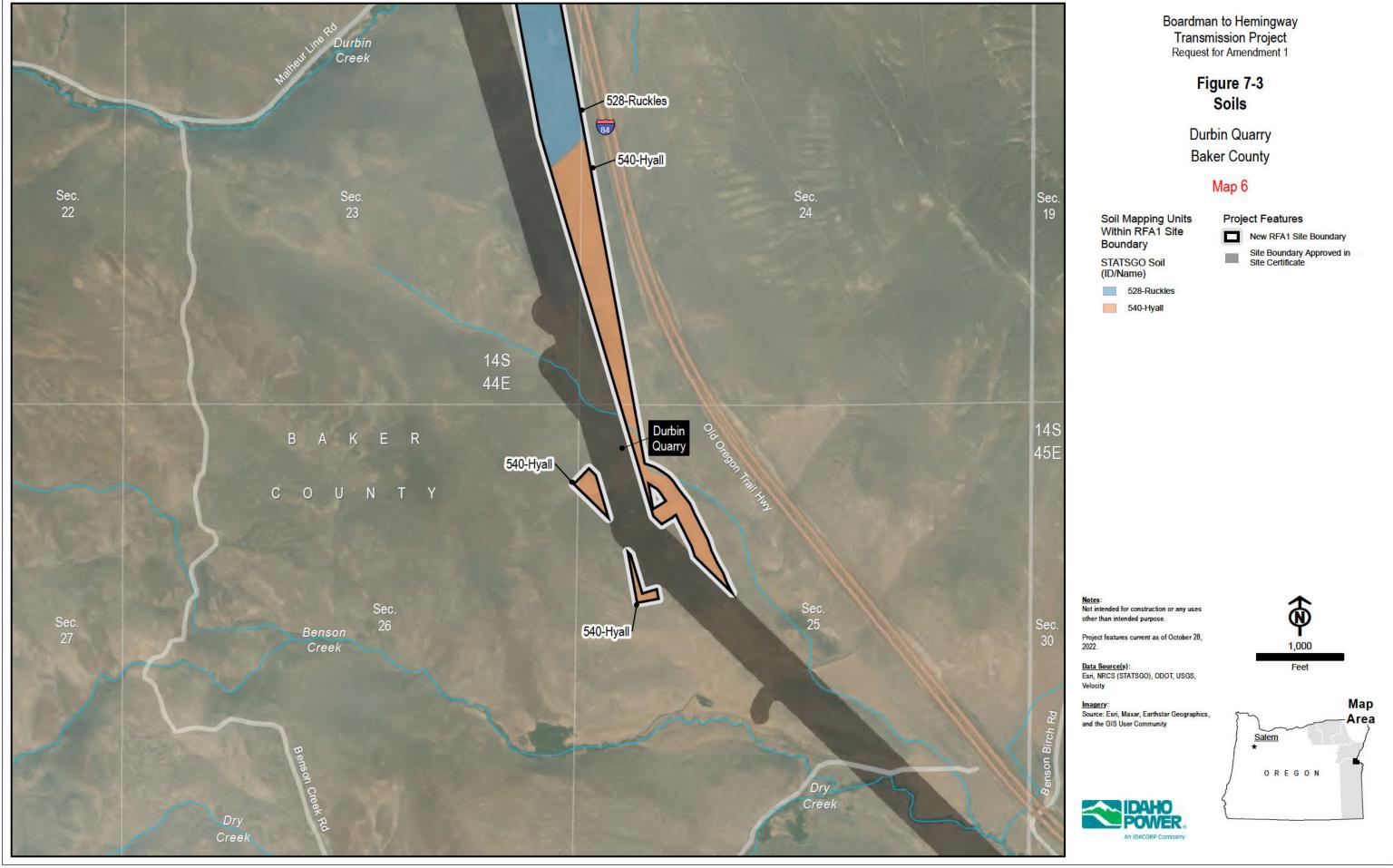


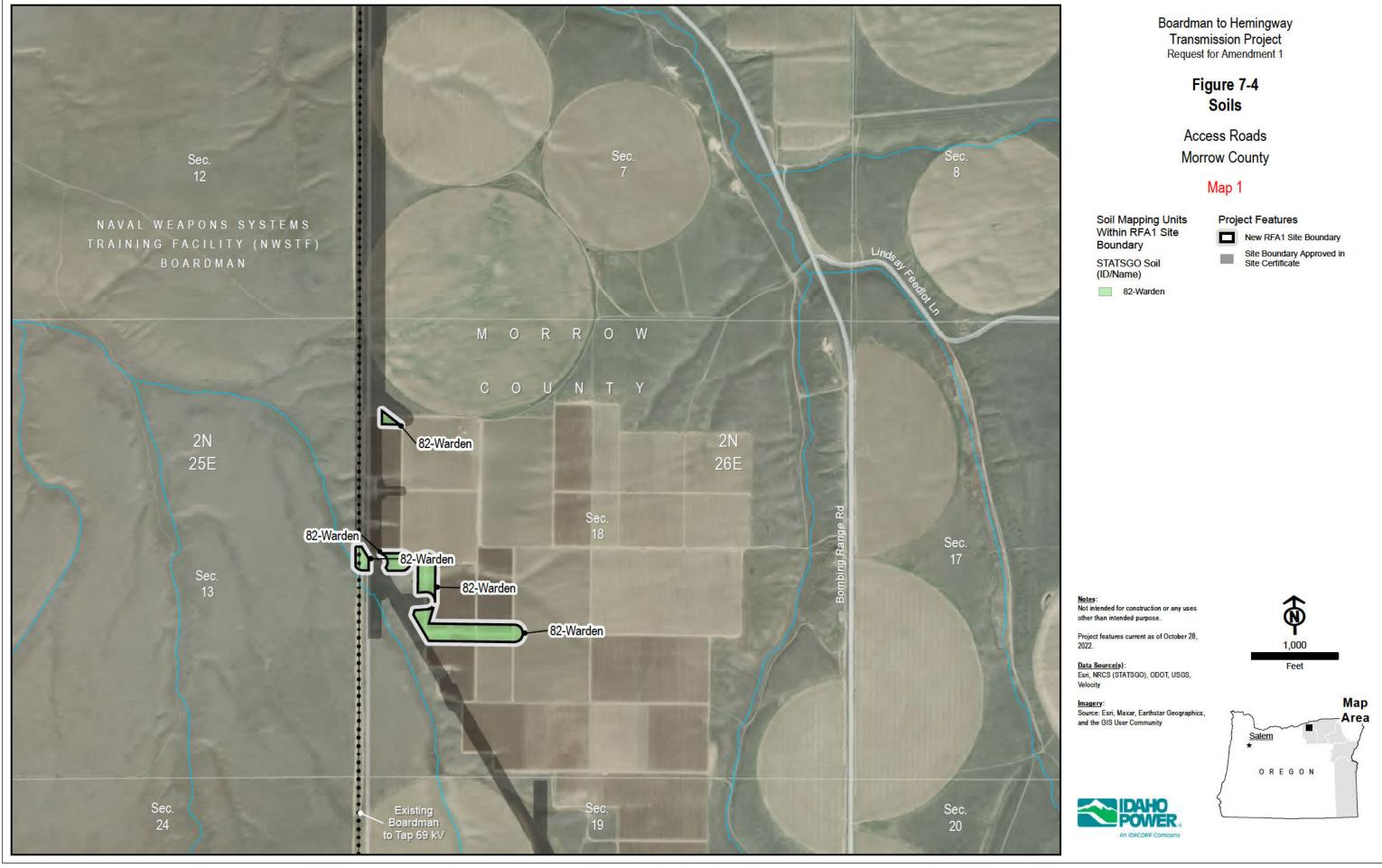
















# Figure 7-4 Soils

Access Roads Morrow County

# Map 3

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

385-Hermiston

392-Lickskillet

## **Project Features**

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

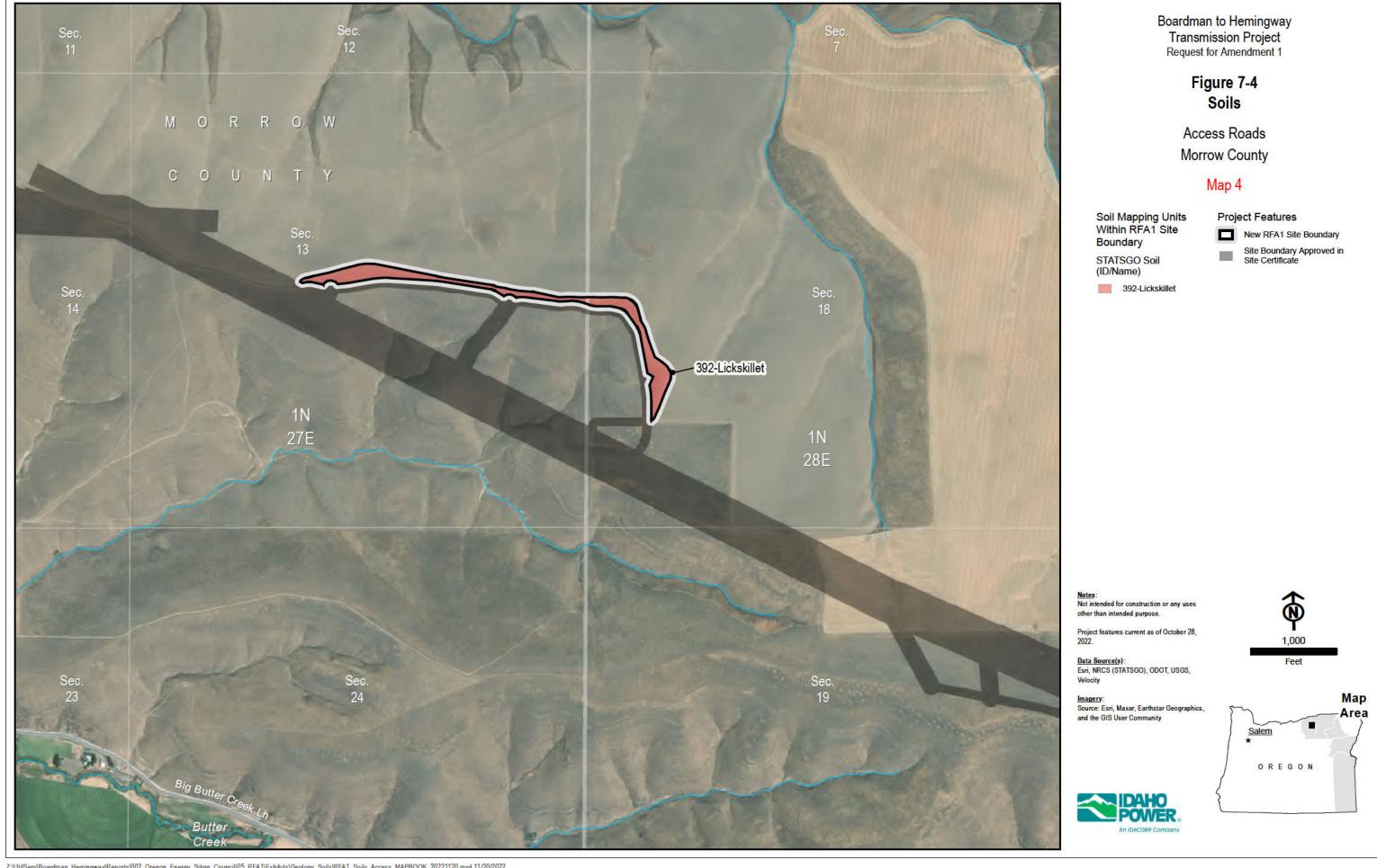
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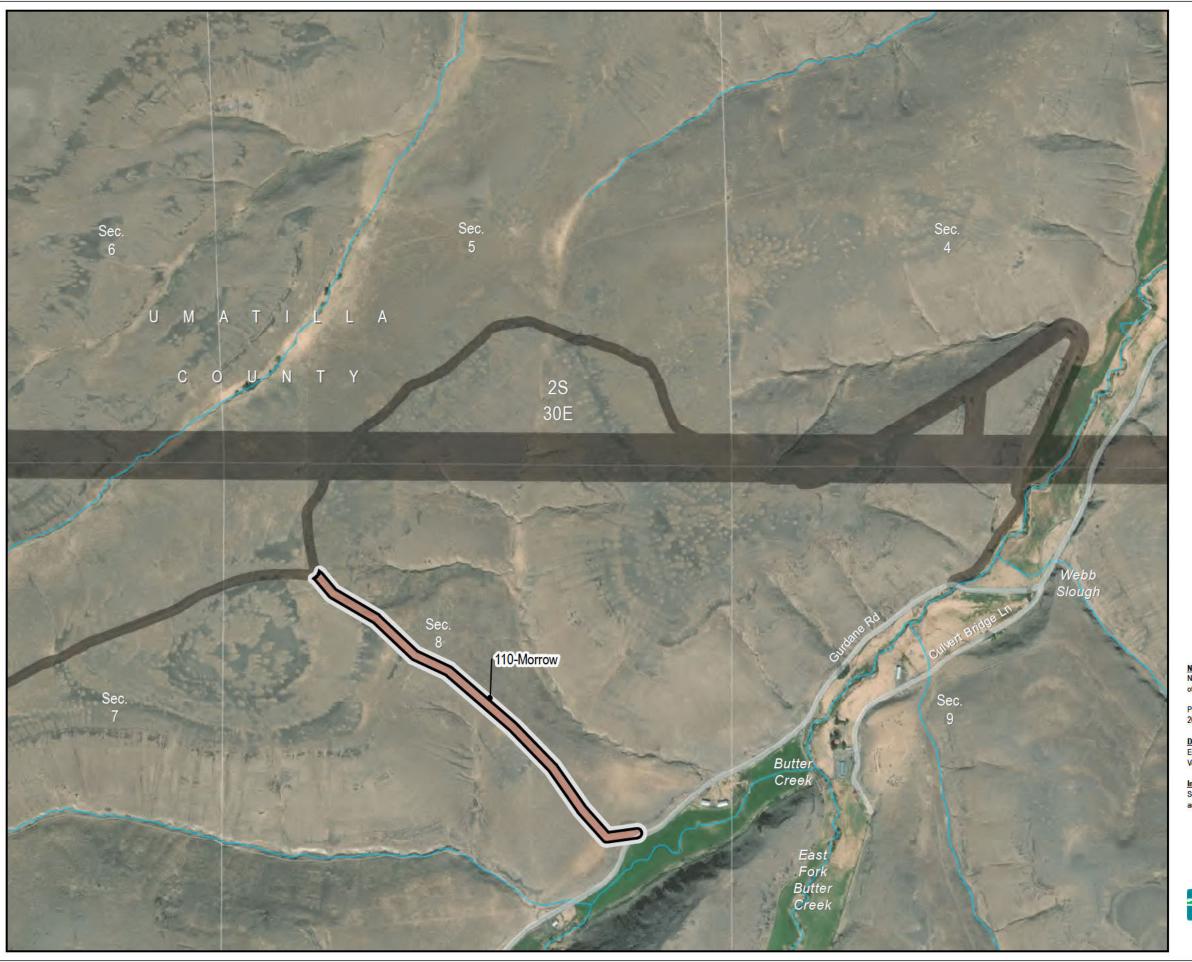
## Imagery:











# Figure 7-4 Soils

Access Roads **Umatilla County** 

# Map 5

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

110-Morrow

**Project Features** 

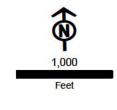
New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

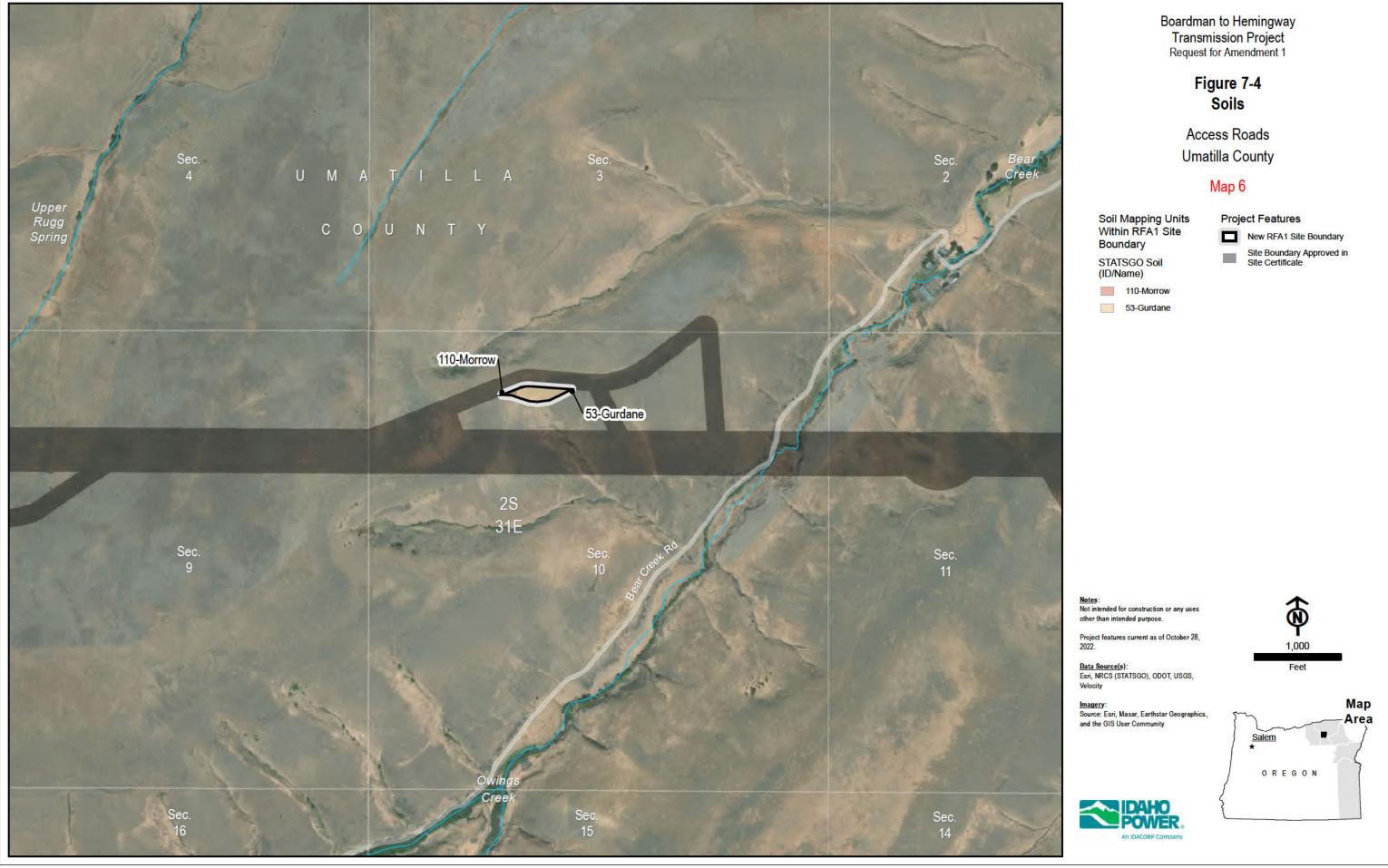
Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,











# Figure 7-4 Soils

Access Roads **Umatilla County** 

# Map 7

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

53-Gurdane

## **Project Features**

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Notes: Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

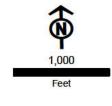








Figure 7-4 Soils

Access Roads **Umatilla County** 

Map 8

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

53-Gurdane

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,







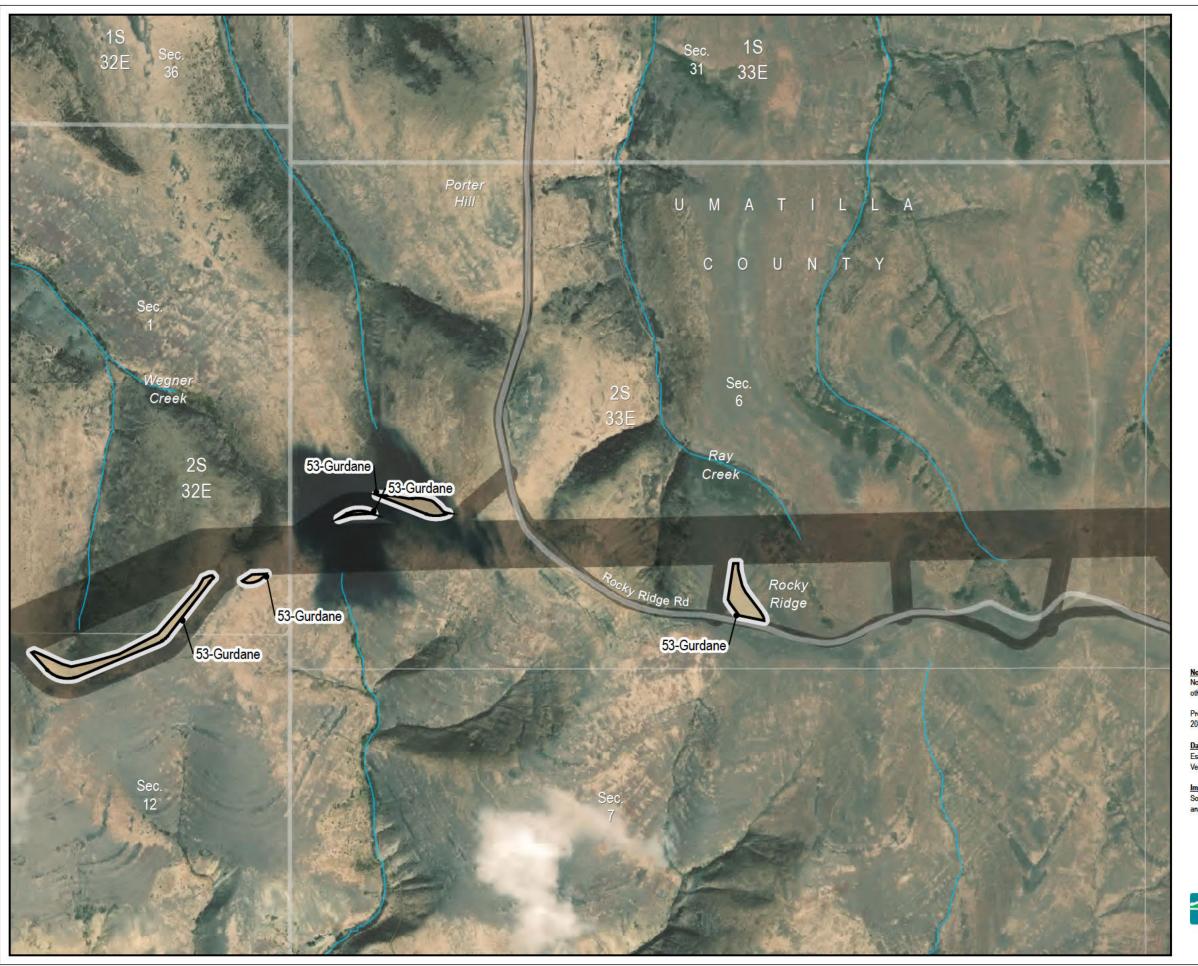


Figure 7-4 Soils

Access Roads **Umatilla County** 

Map 9

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

53-Gurdane

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

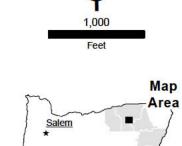
Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

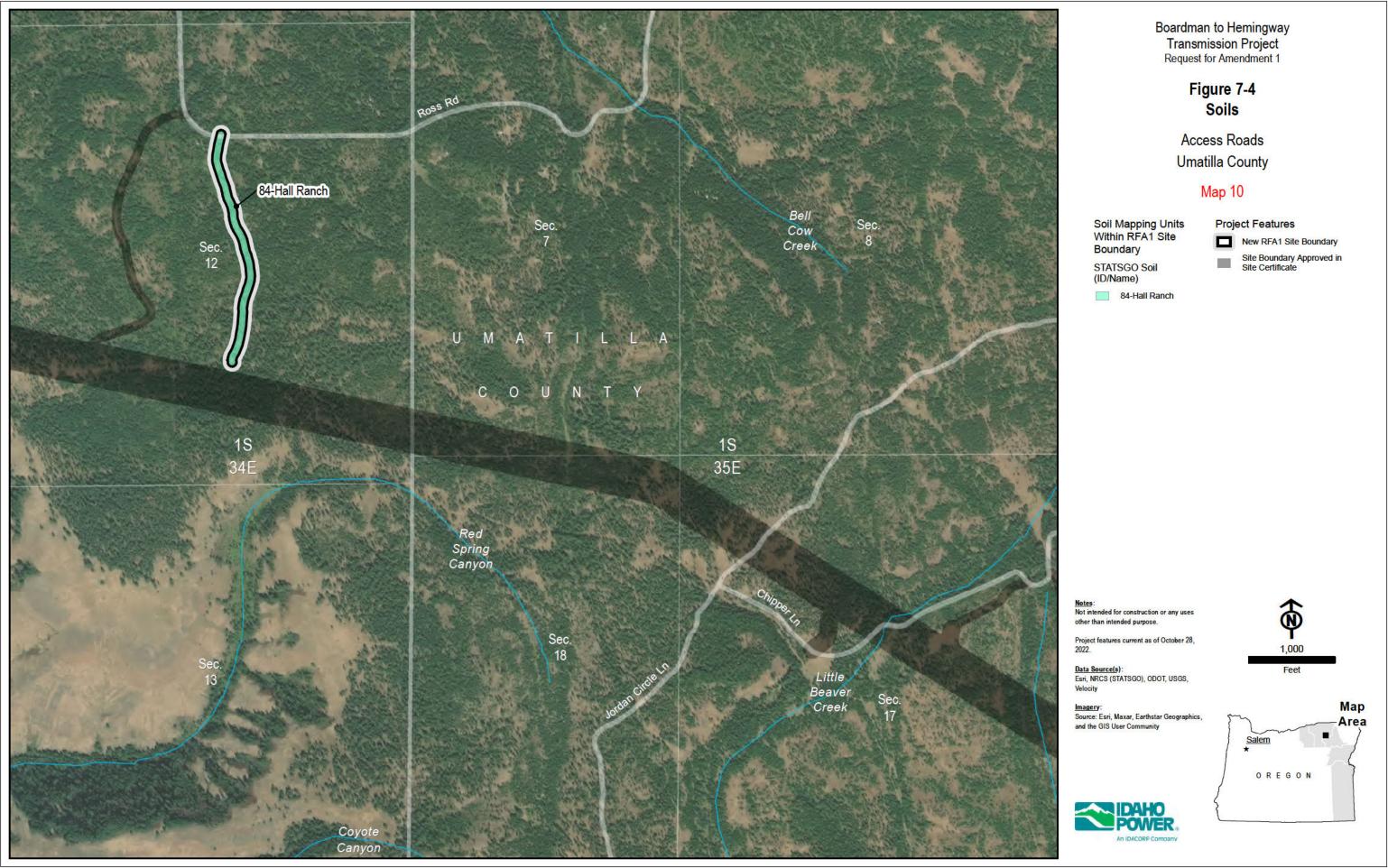
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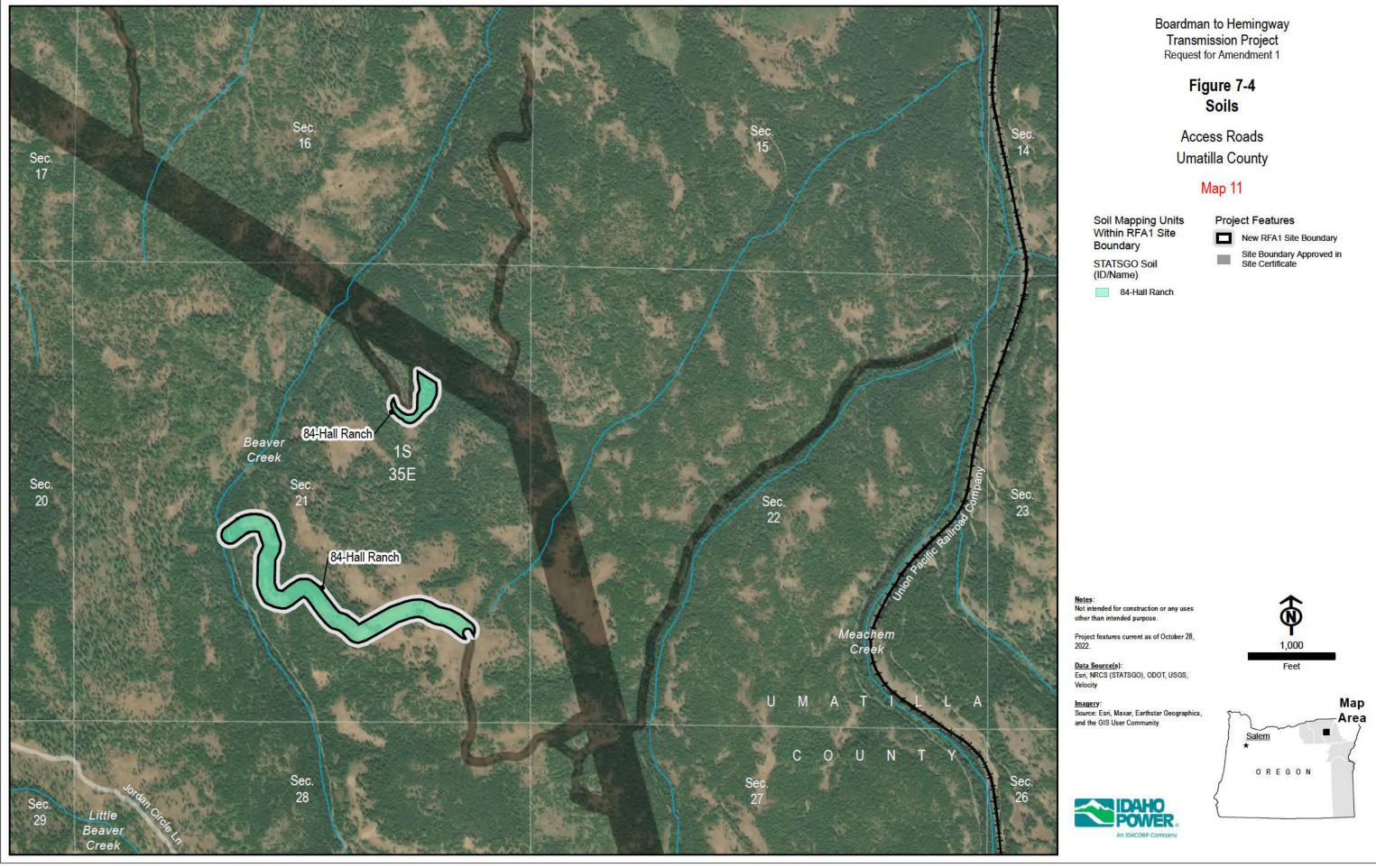
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

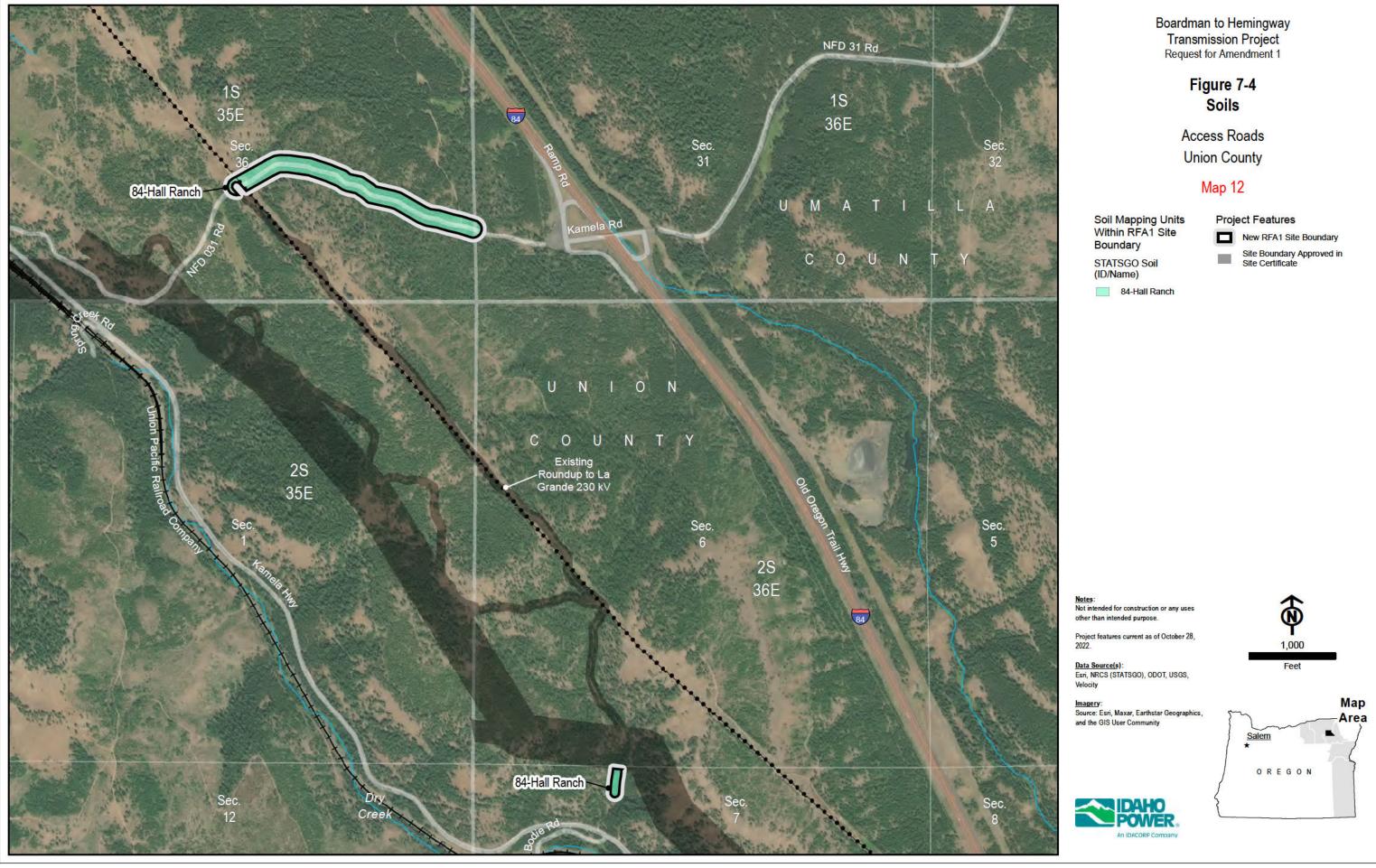


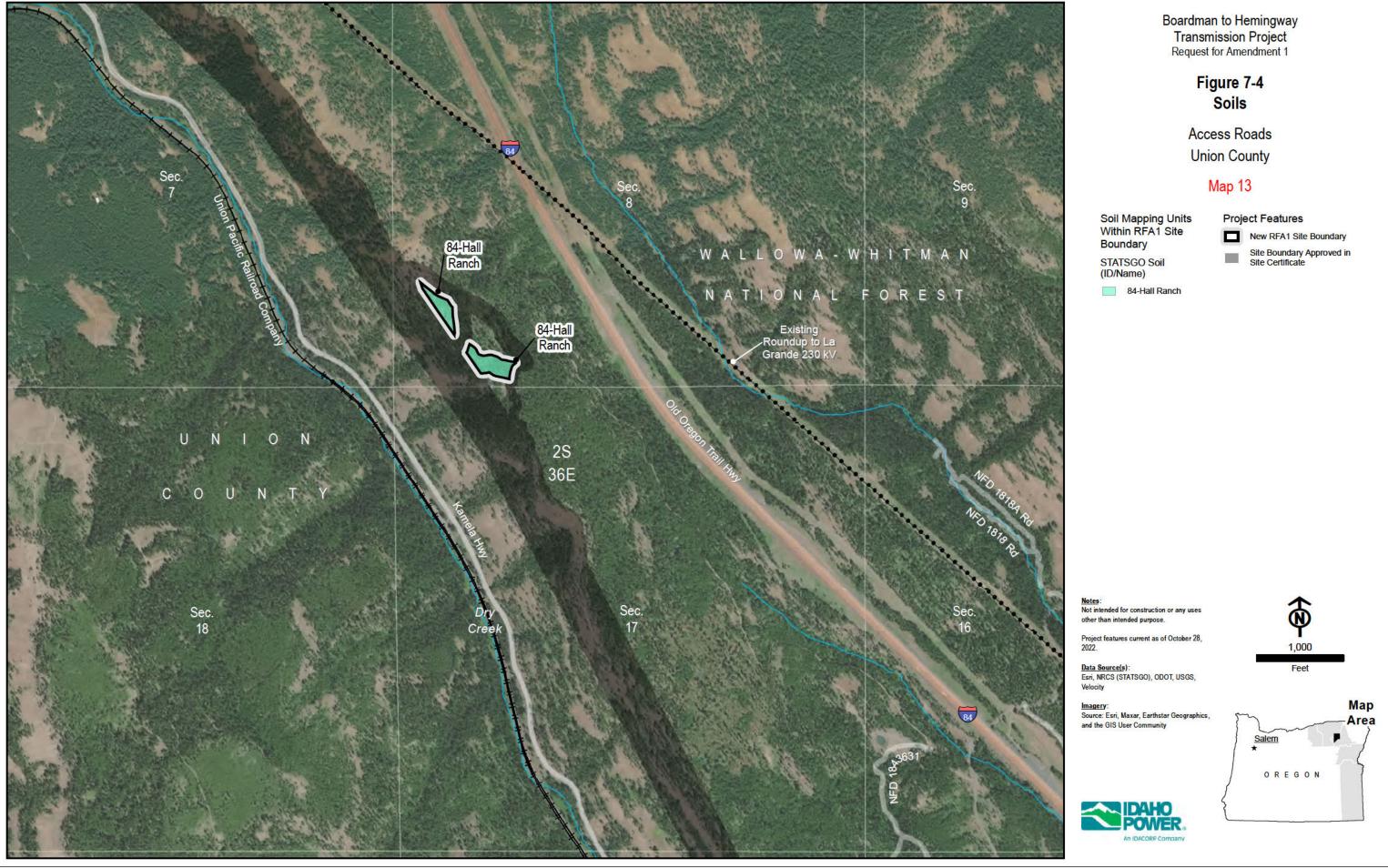
OREGON

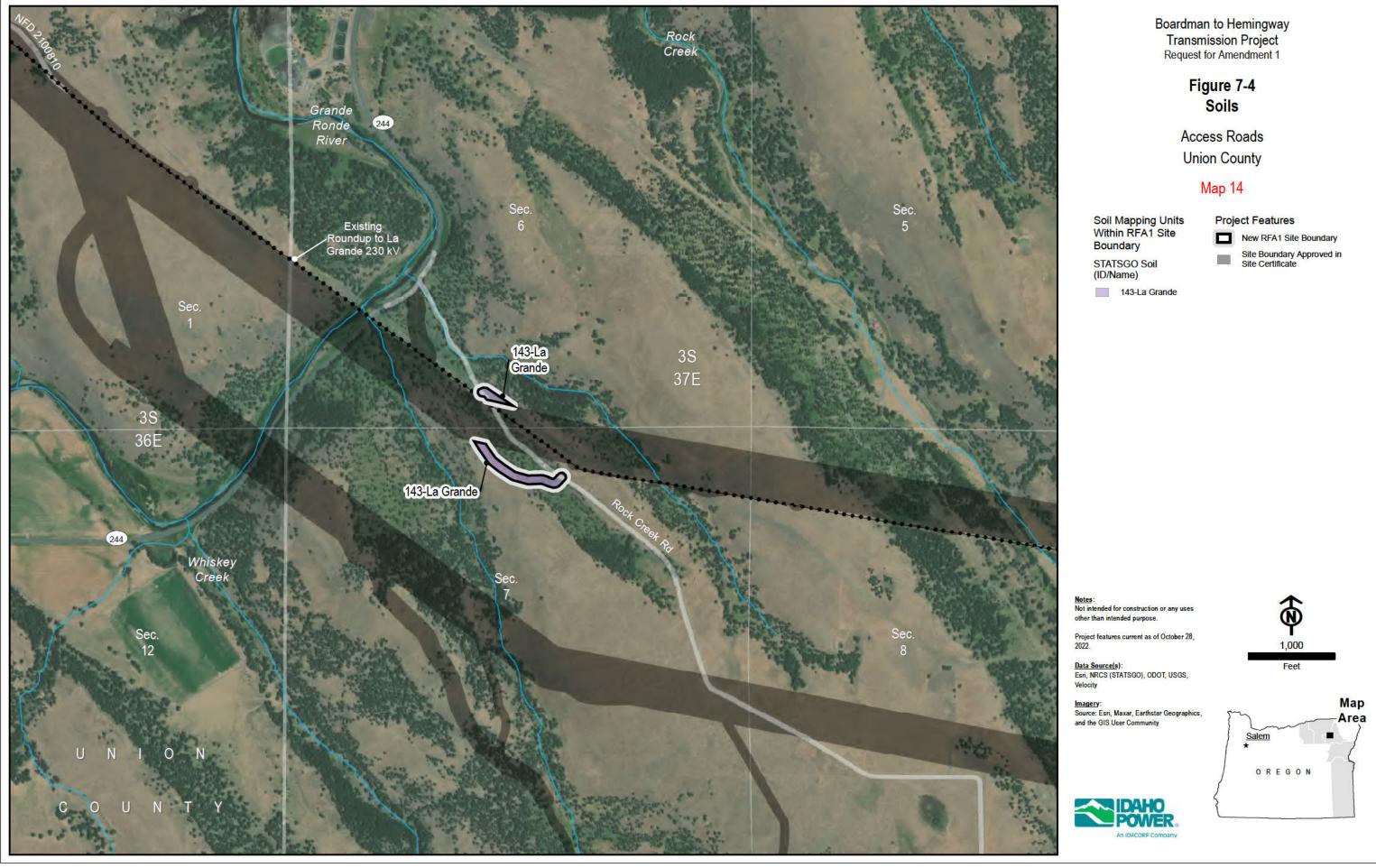




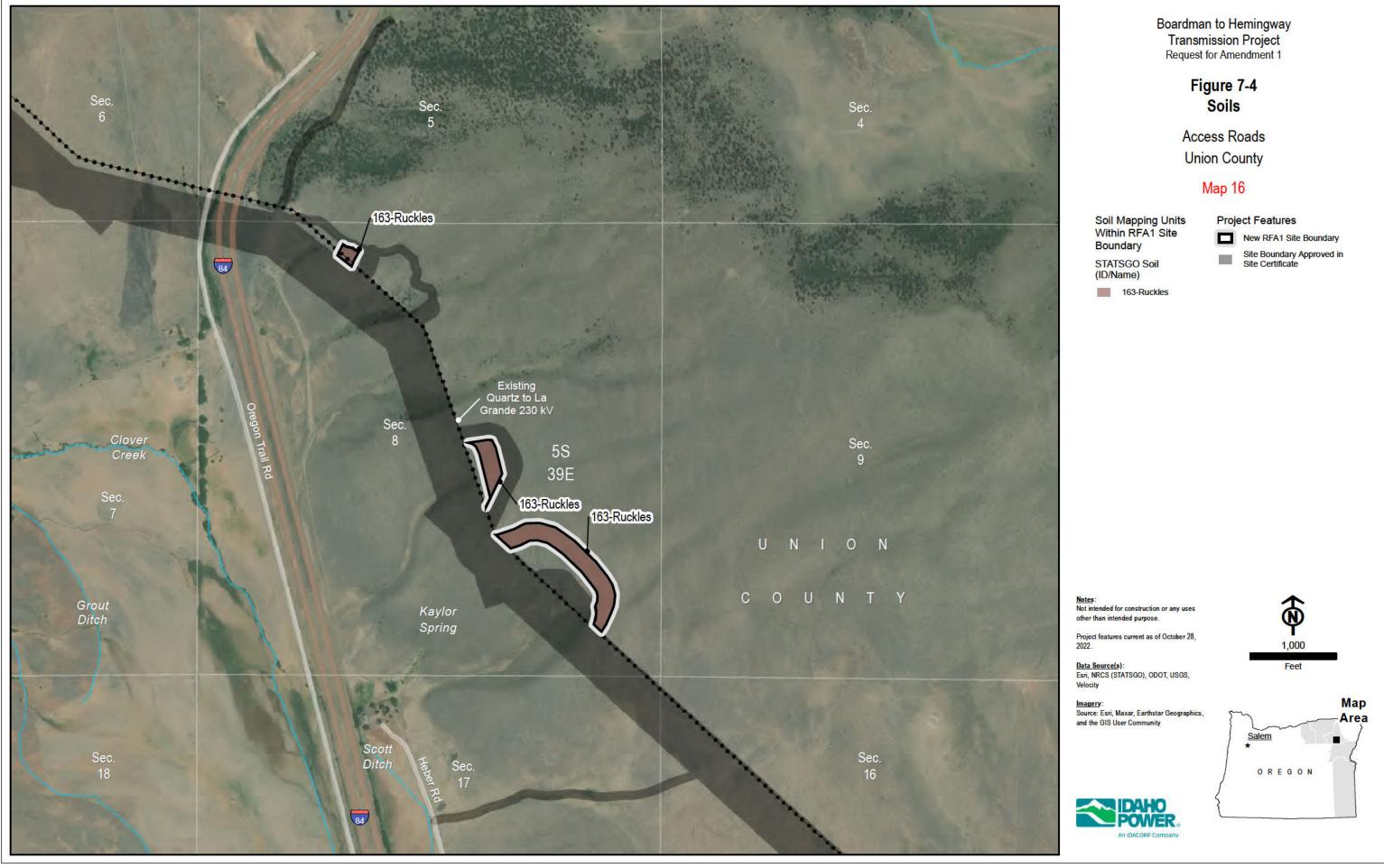


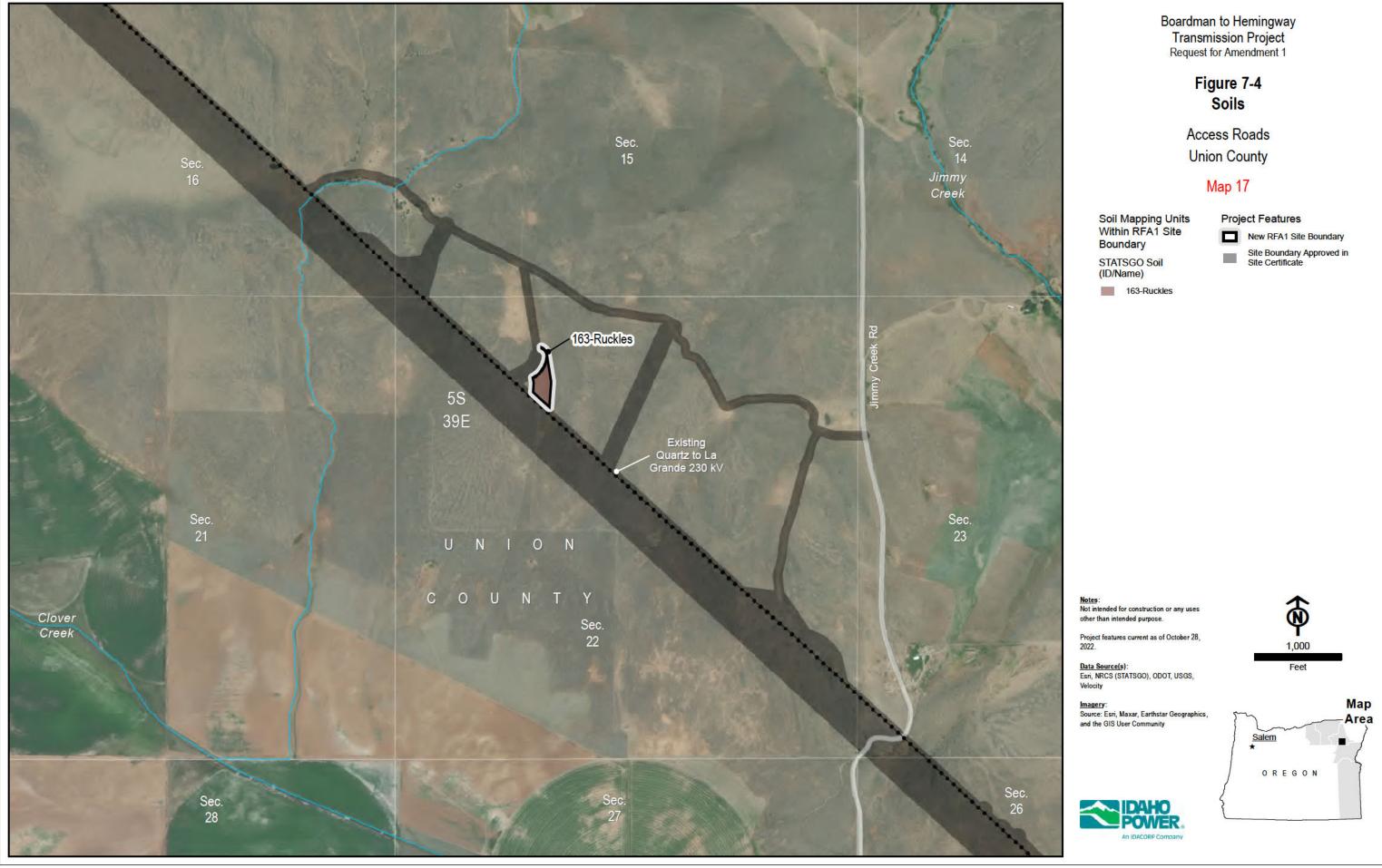


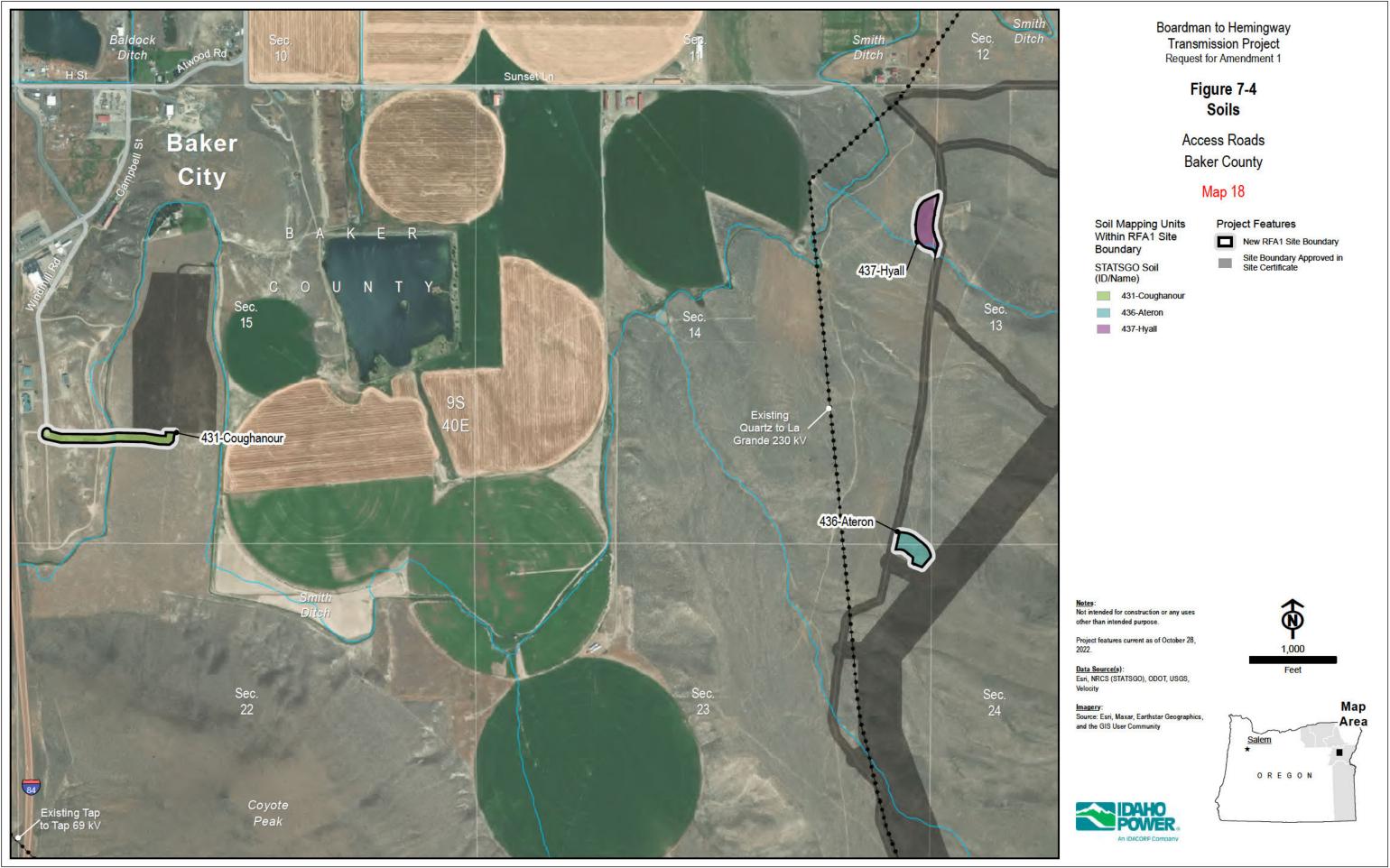


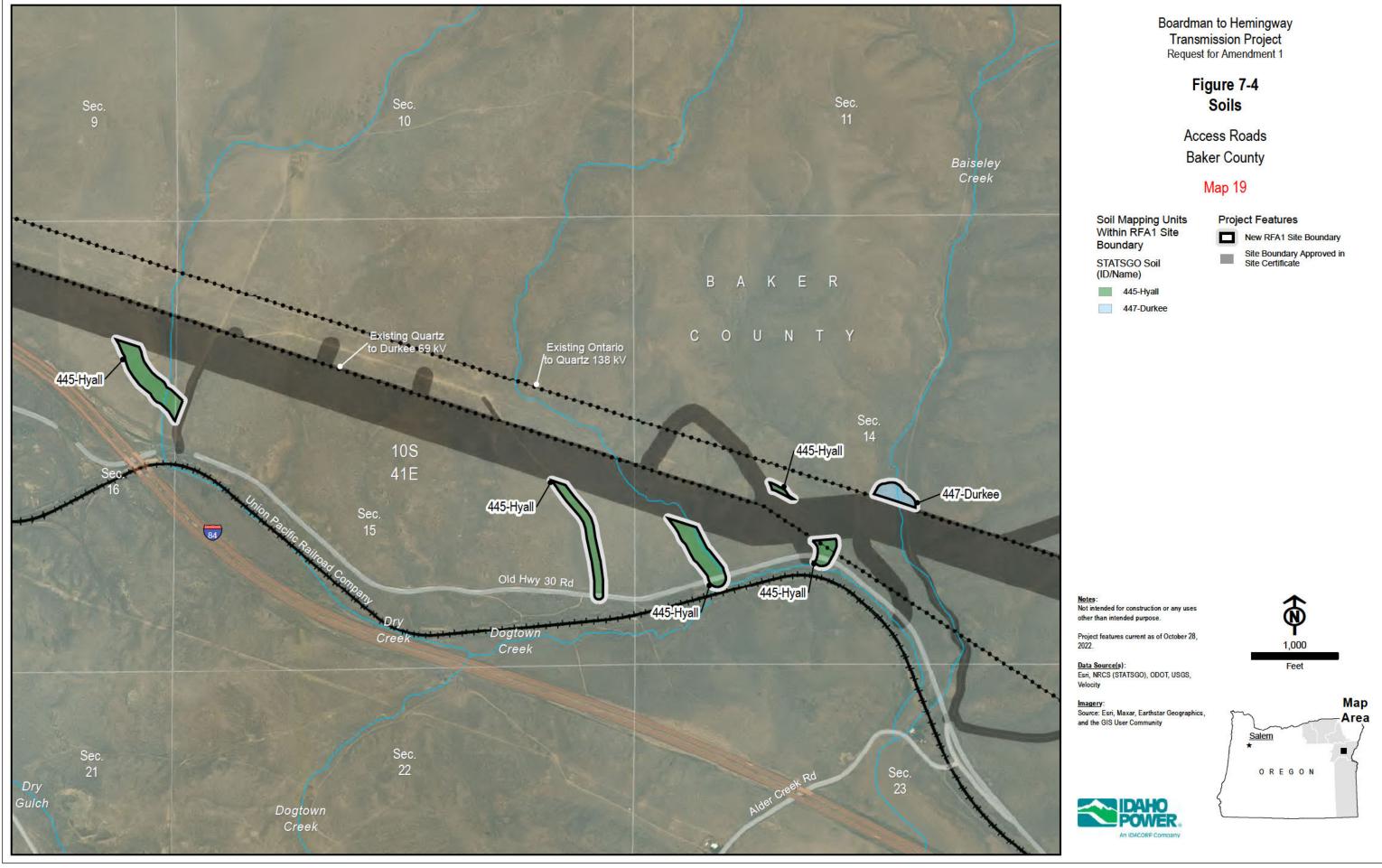




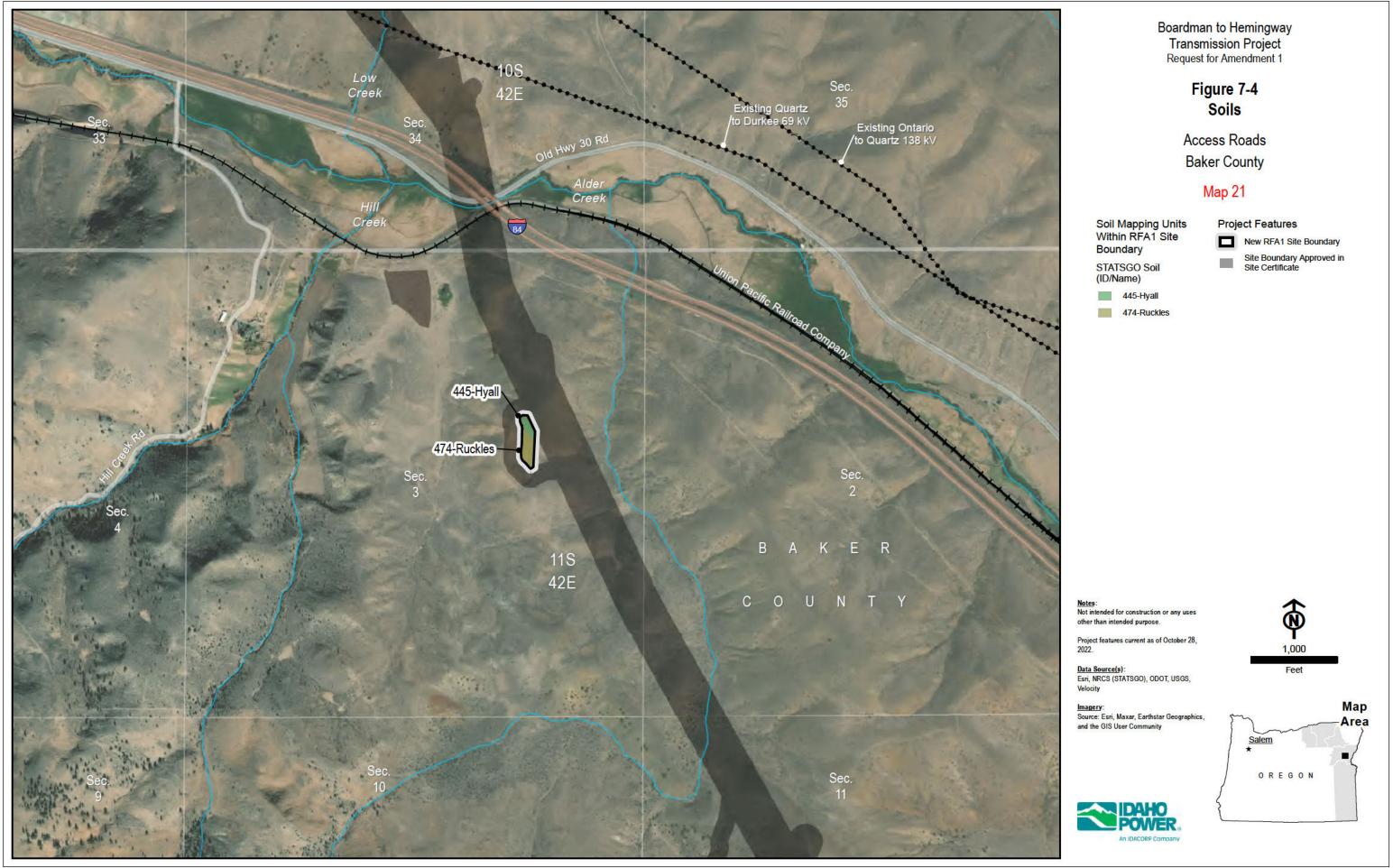


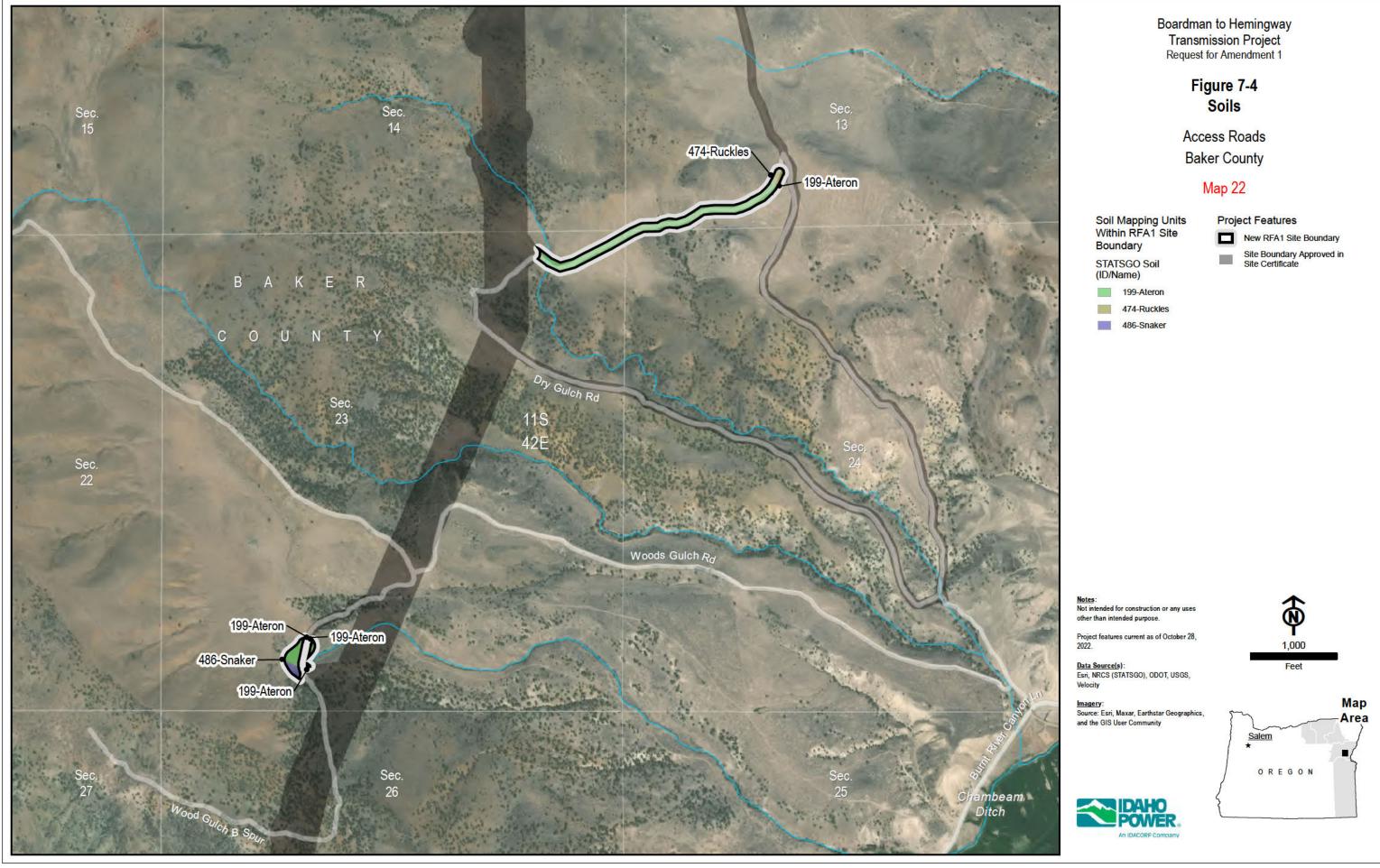


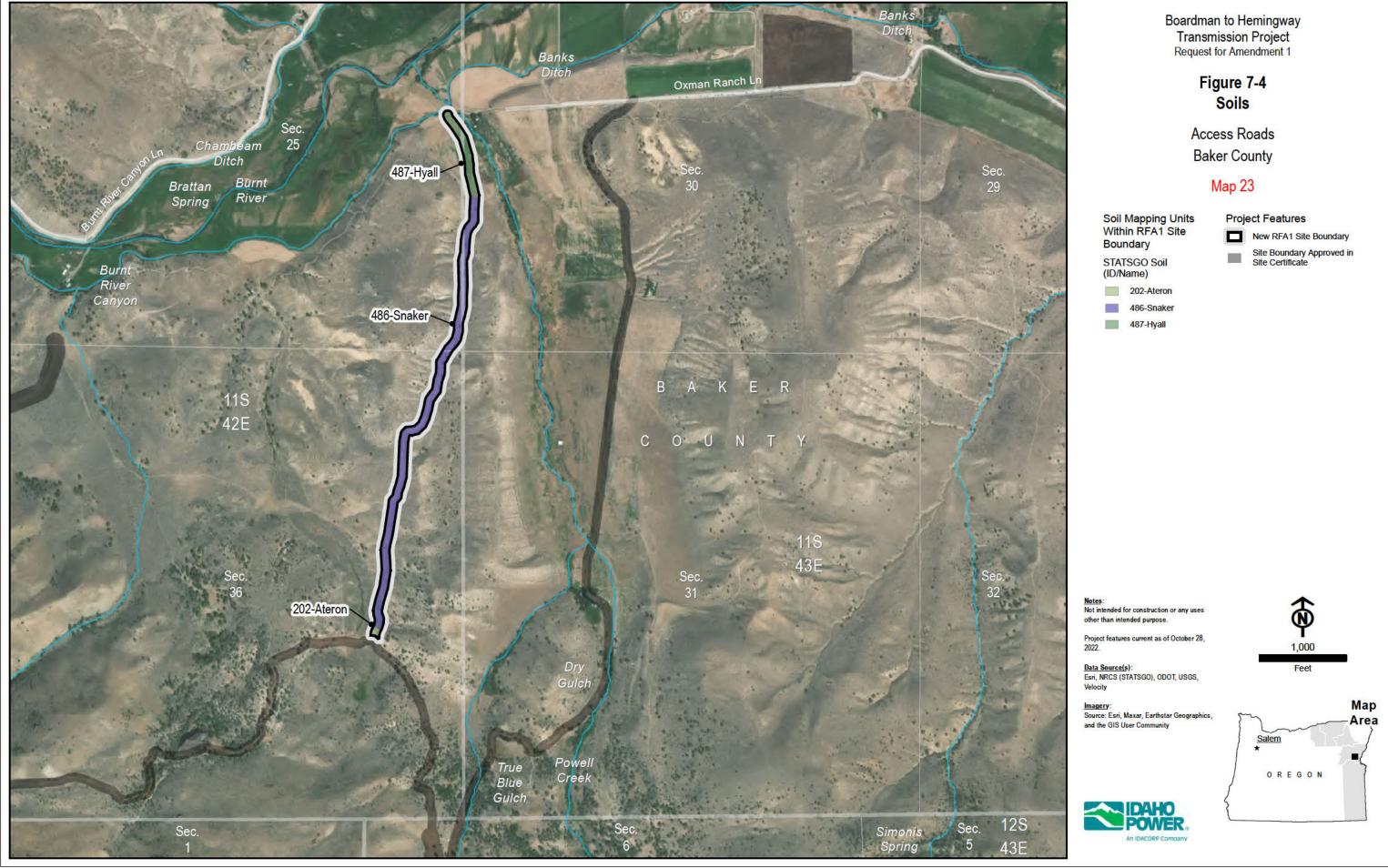














# Figure 7-4 Soils

Access Roads **Baker County** 

Map 24

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

202-Ateron

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Notes: Not intended for construction or any uses

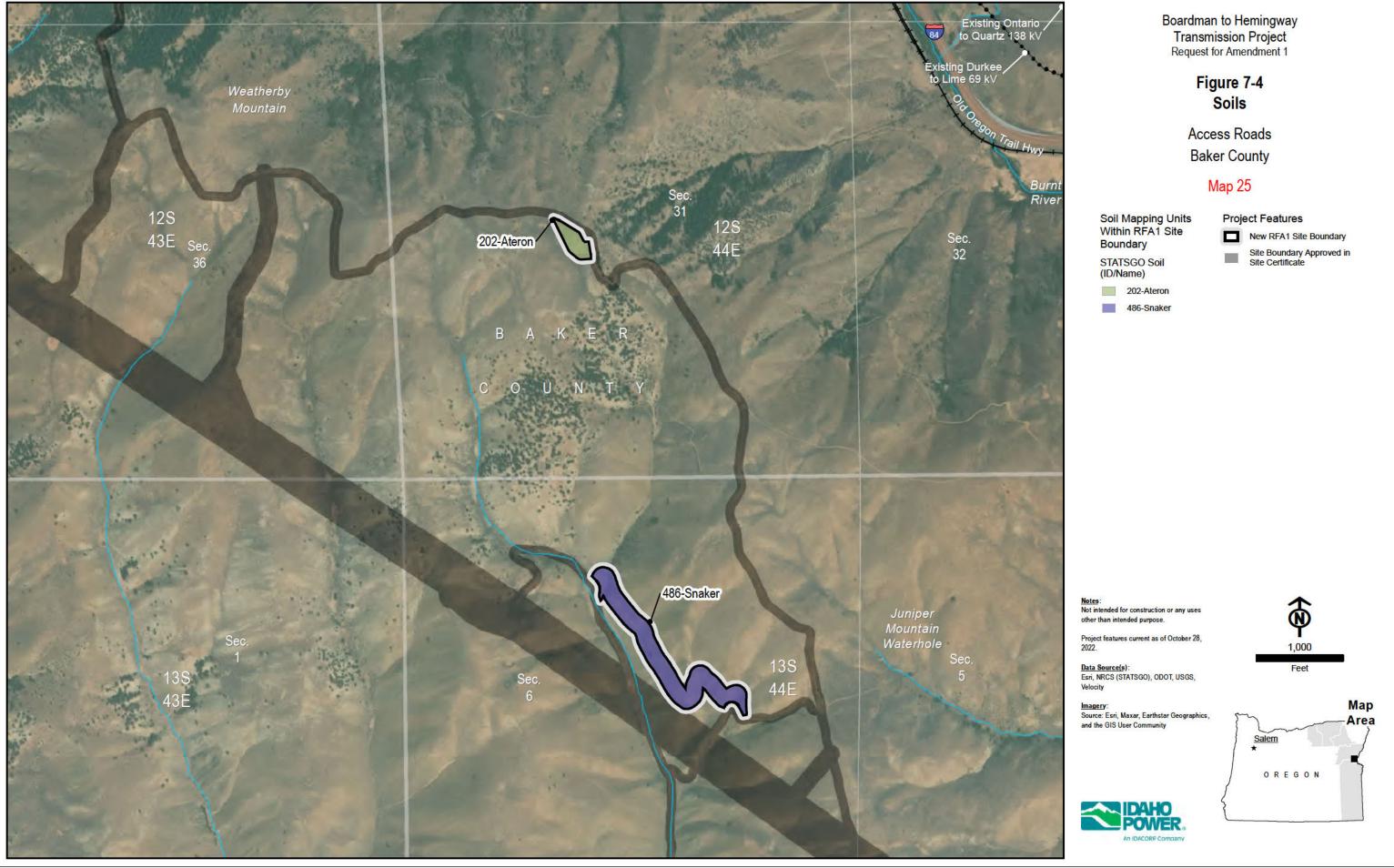
Project features current as of October 28, 2022.

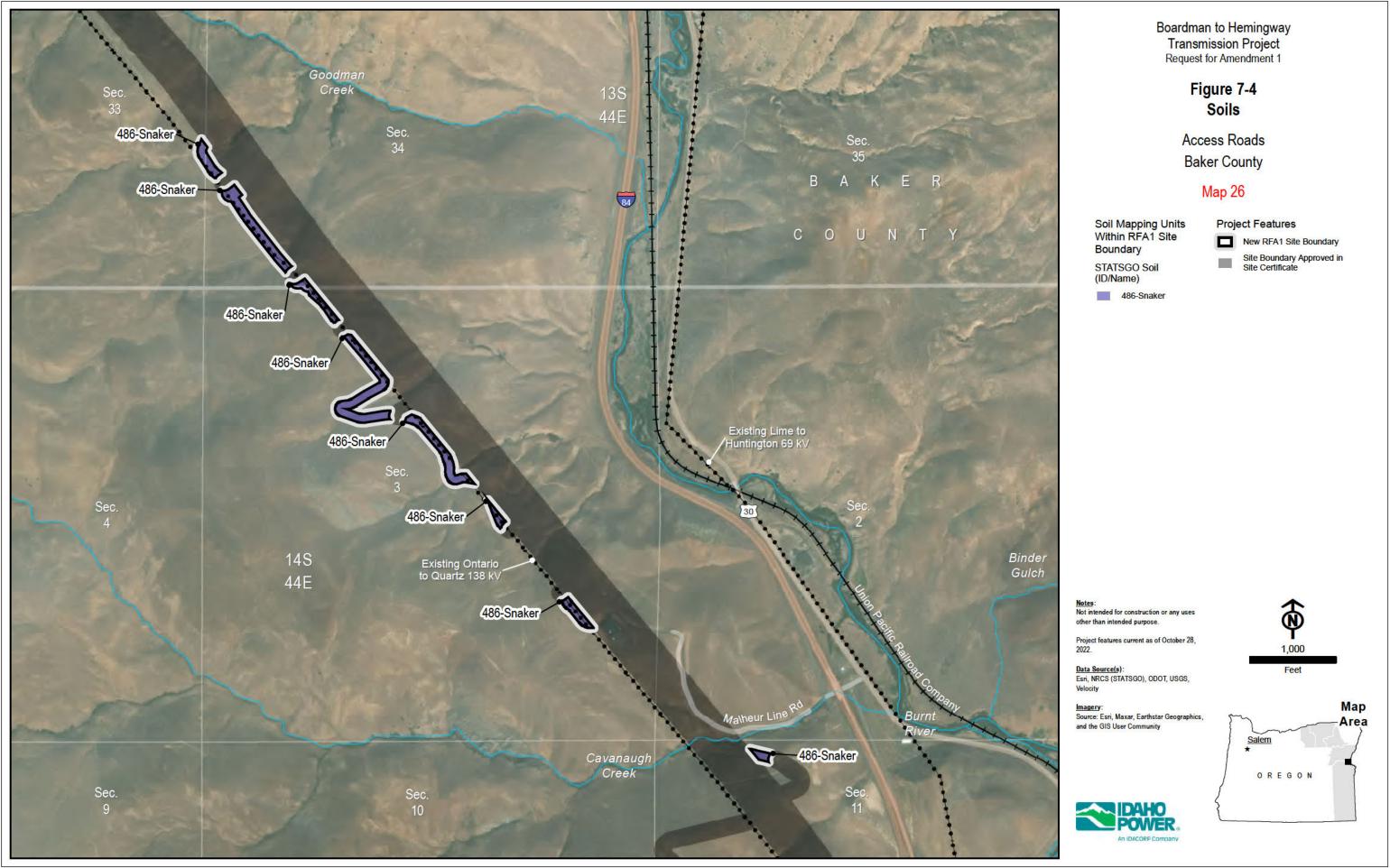
Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

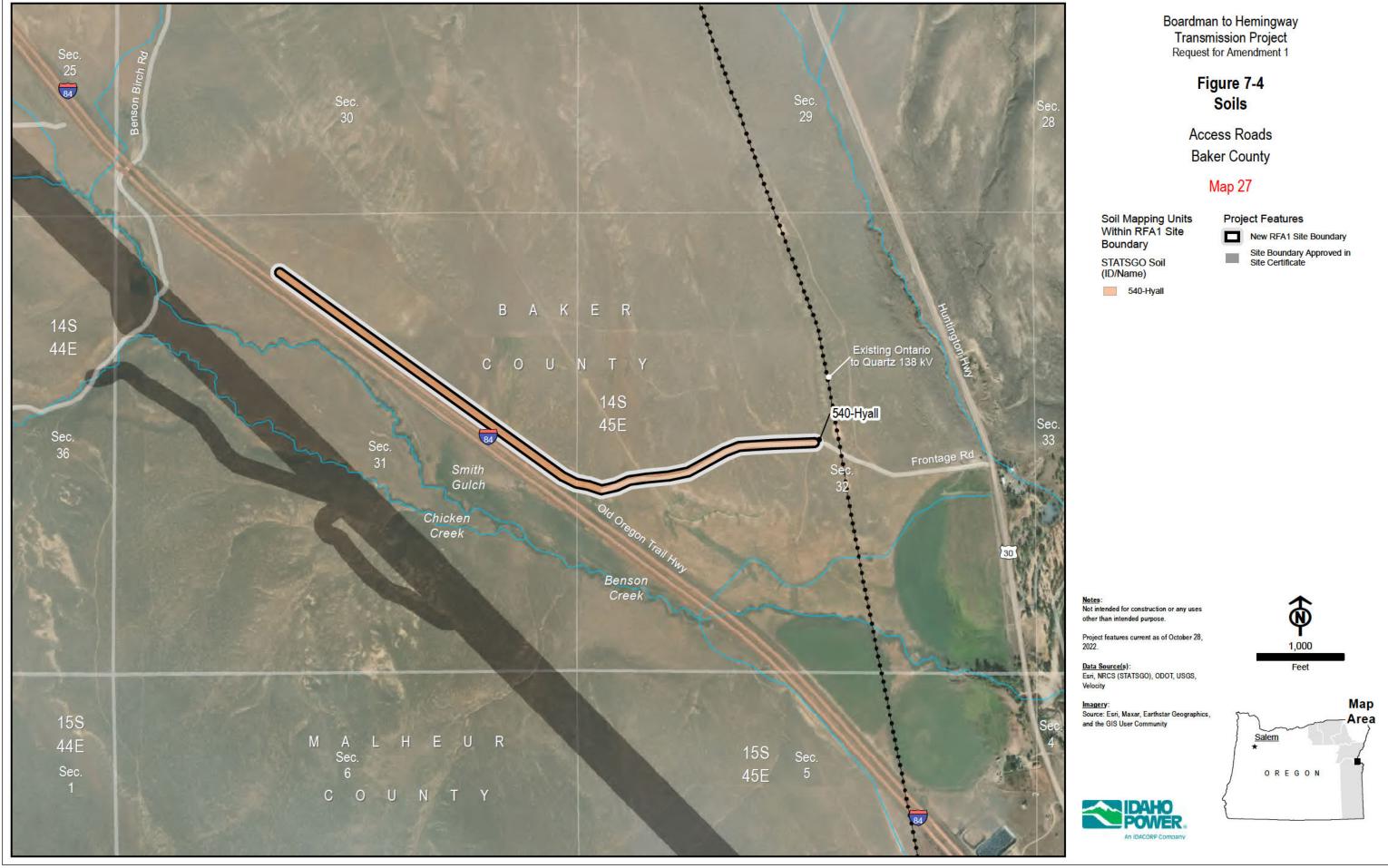














## Figure 7-4 Soils

Access Roads Malheur County

Map 28

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

540-Hyall

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,









# Figure 7-4 Soils

Access Roads Malheur County

# Map 29

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

213-Poall

**Project Features** 

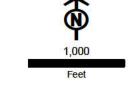
New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,









## Figure 7-4 Soils

Access Roads Malheur County

Map 30

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

220-Chilcott

**Project Features** 

New RFA1 Site Boundary

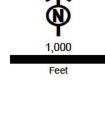
Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

## Imagery:









# Figure 7-4 Soils

Access Roads Malheur County

# Map 31

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

220-Chilcott

**Project Features** 

New RFA1 Site Boundary

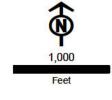
Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

## lmagery:









## Figure 7-4 Soils

Access Roads Malheur County

Map 32

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

220-Chilcott

**Project Features** 

New RFA1 Site Boundary

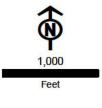
Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

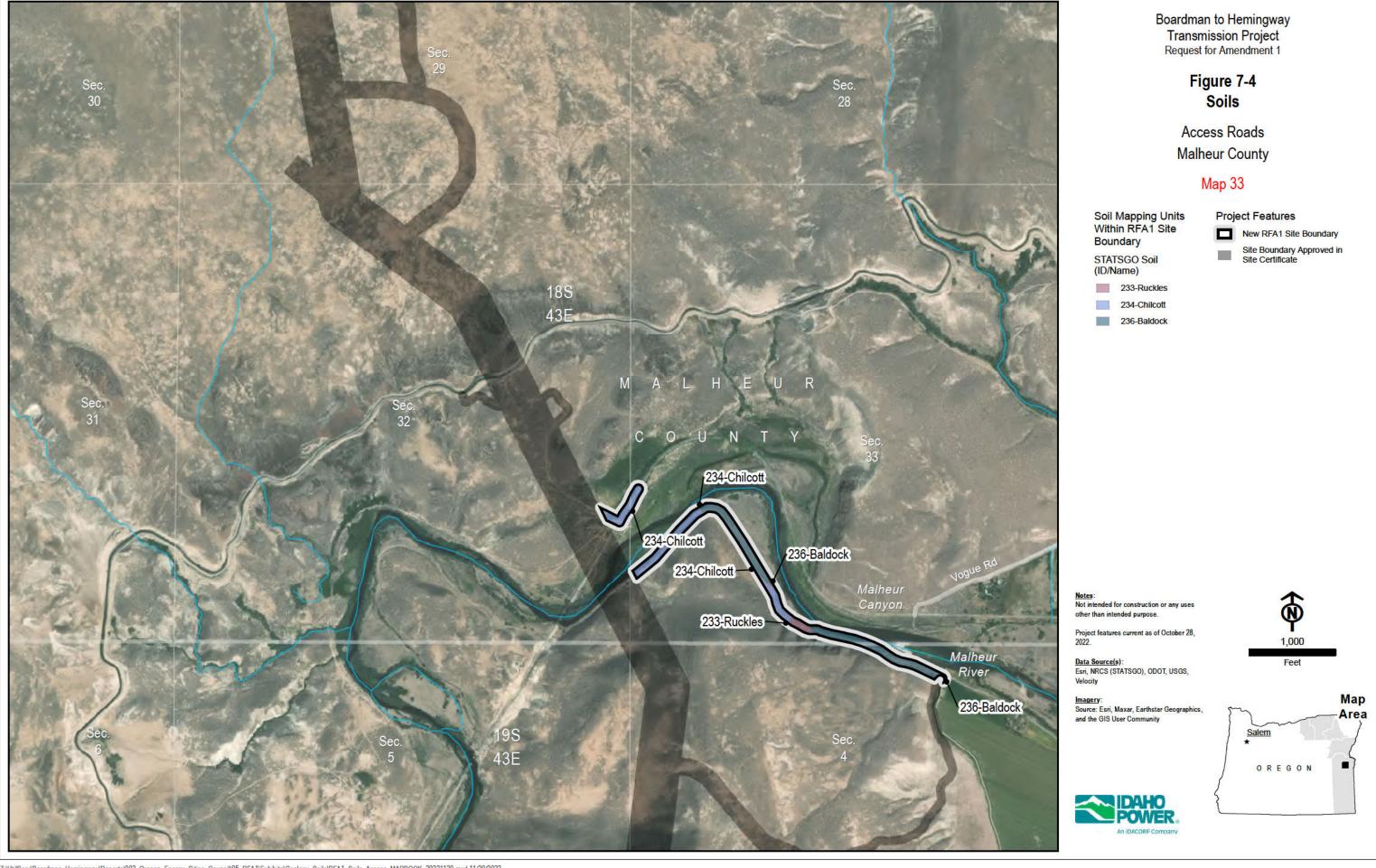
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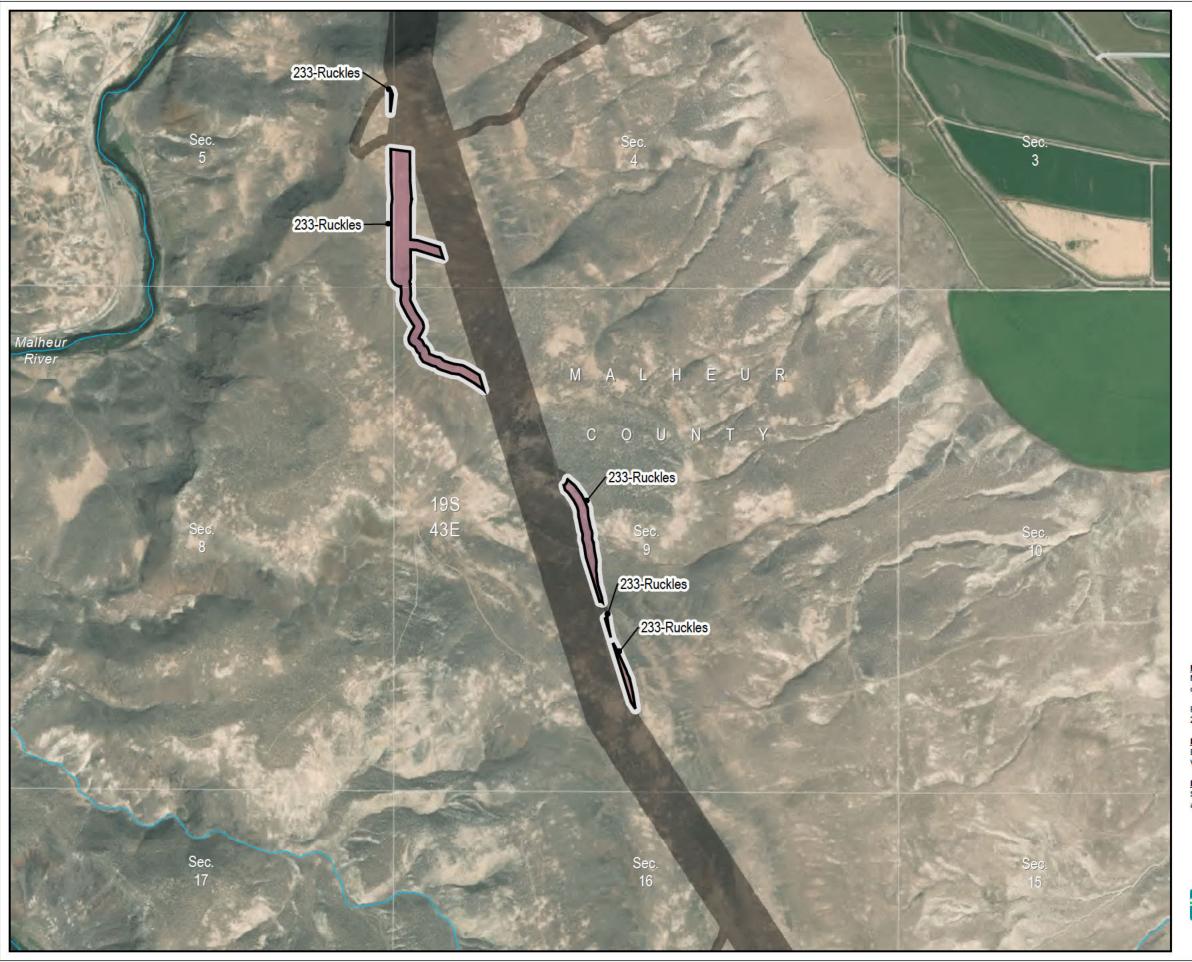
## Imagery:











## Figure 7-4 Soils

Access Roads Malheur County

Map 34

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

233-Ruckles

**Project Features** 

New RFA1 Site Boundary

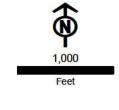
Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

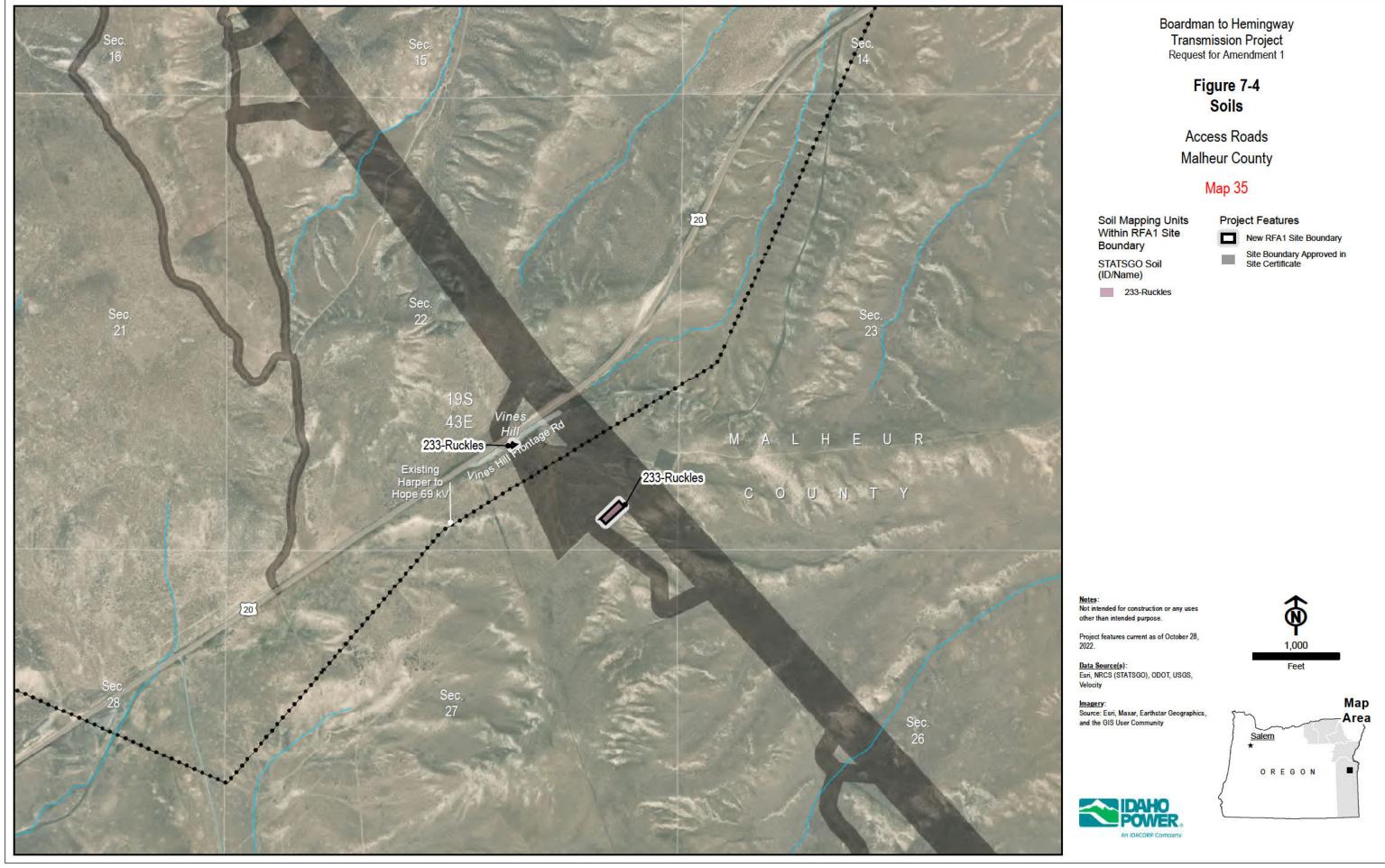
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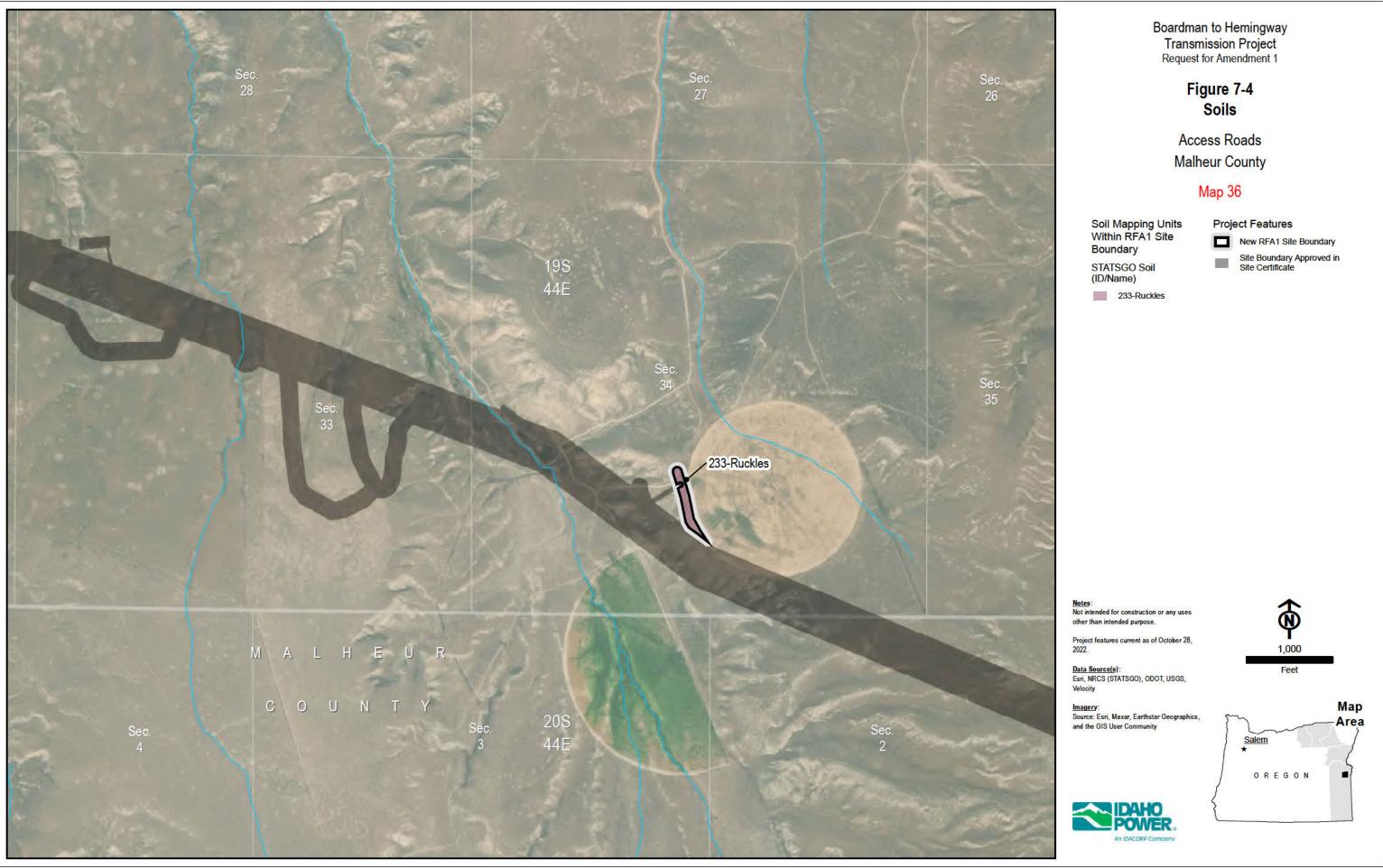
### lmagery:













# Figure 7-4 Soils

Access Roads Malheur County

Map 37

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

233-Ruckles

**Project Features** 

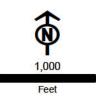
New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,









# Figure 7-4 Soils

Access Roads Malheur County

Map 38

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

233-Ruckles

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

### Imagery:

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



1,000

Feet





## Figure 7-4 Soils

Access Roads Malheur County

Map 39

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

233-Ruckles

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,









# Figure 7-4 Soils

Access Roads Malheur County

### Map 40

Soil Mapping Units Within RFA1 Site Boundary

STATSGO Soil (ID/Name)

251-Nyssaton 261-Willhill

### **Project Features**

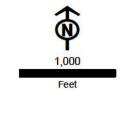
New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

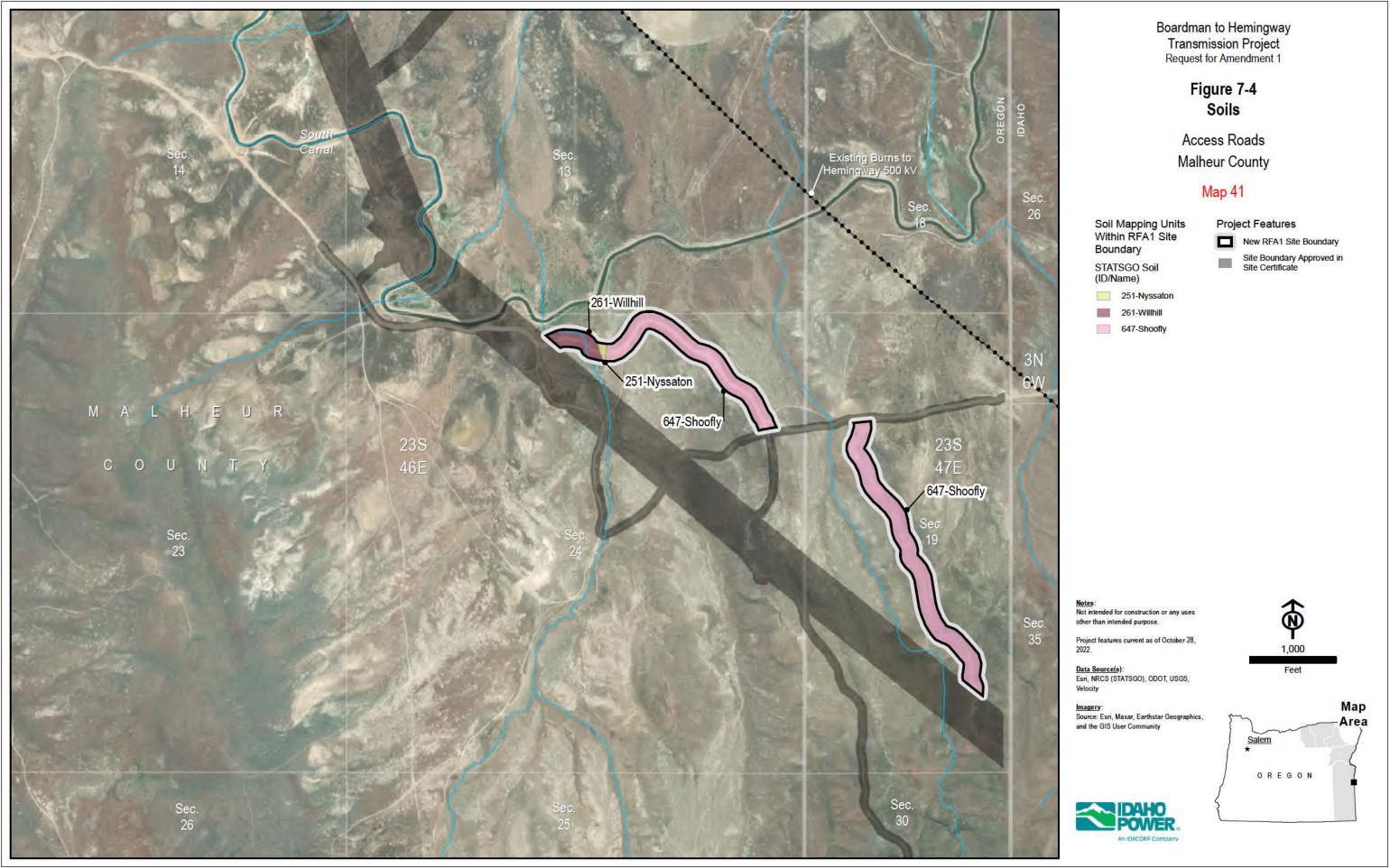
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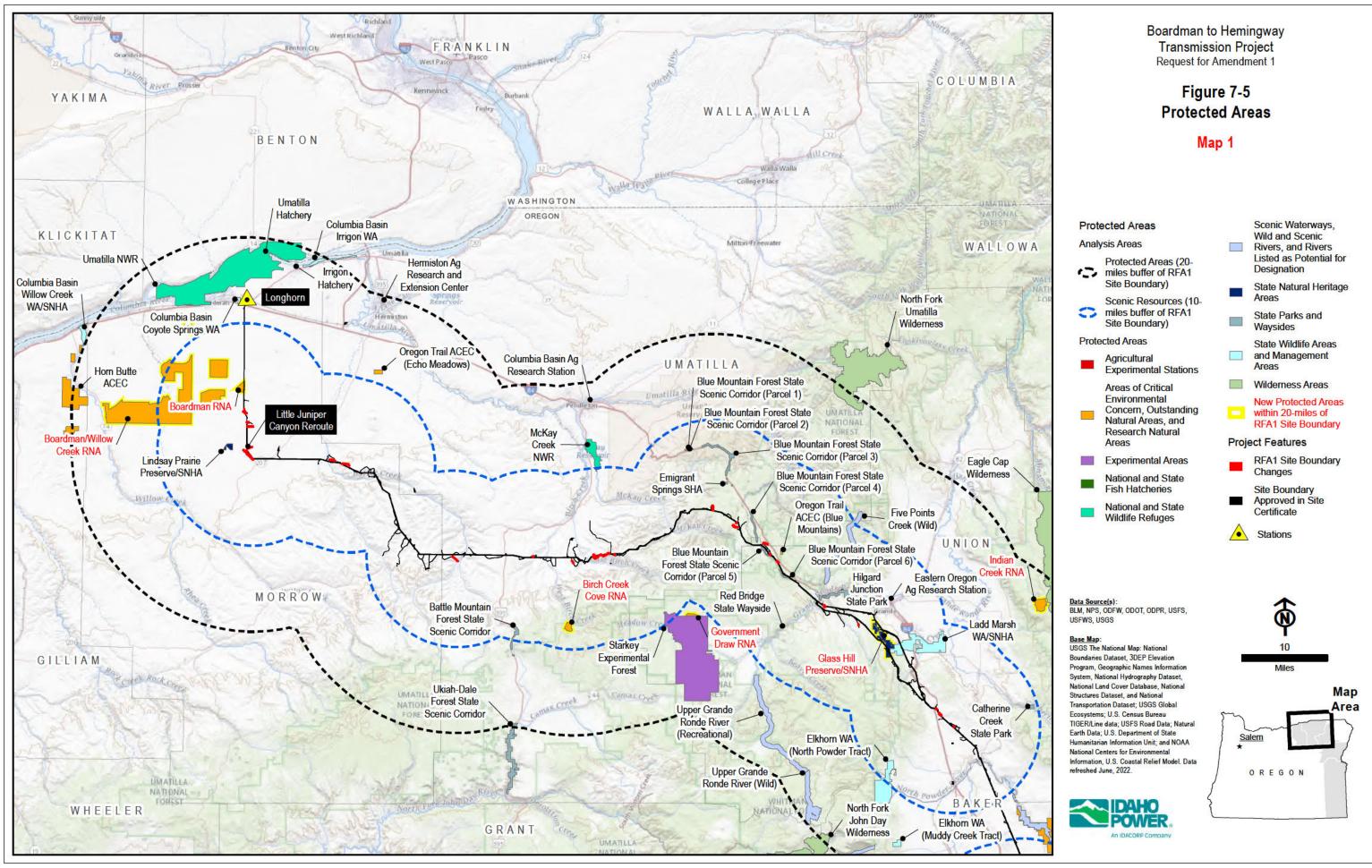
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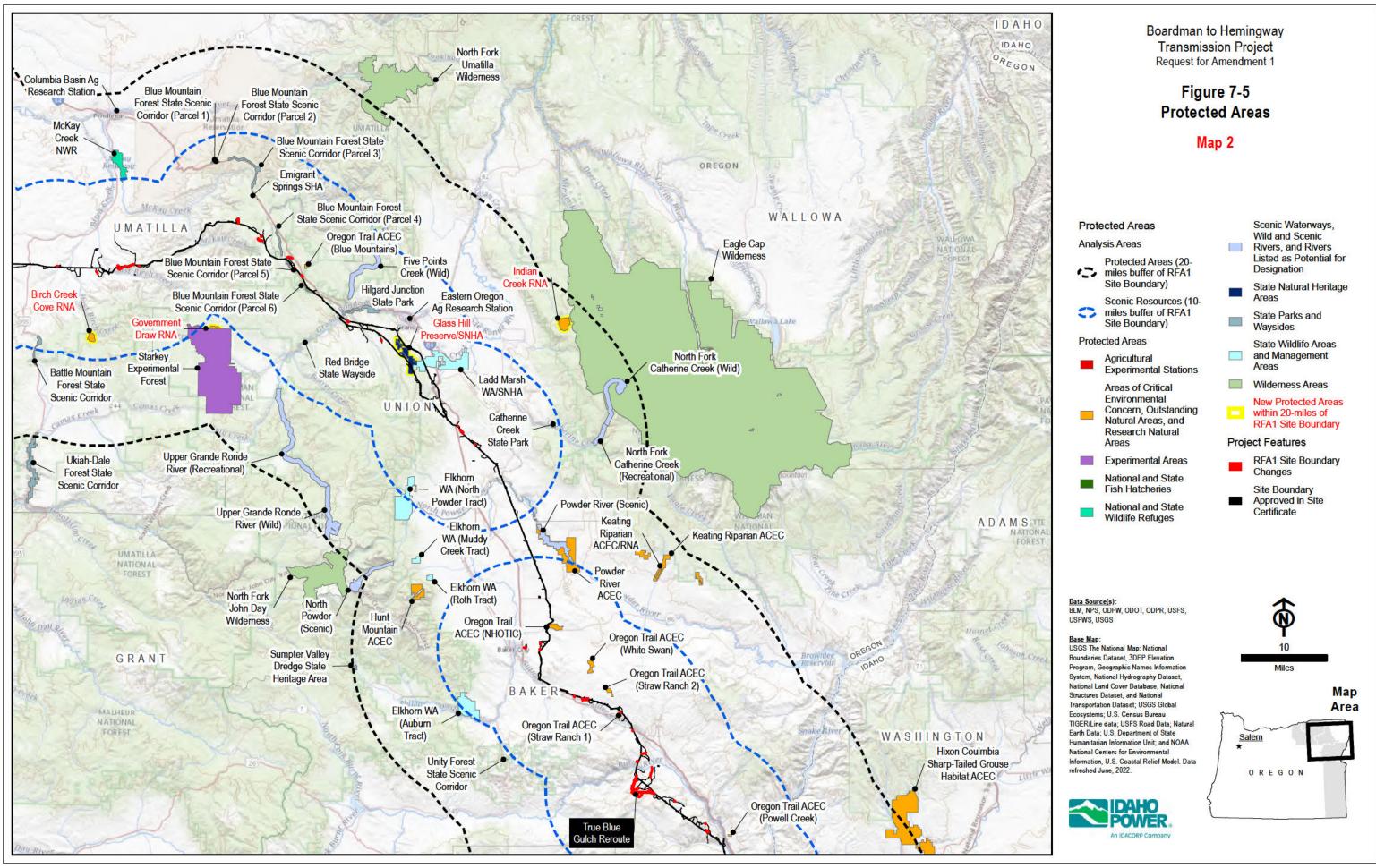


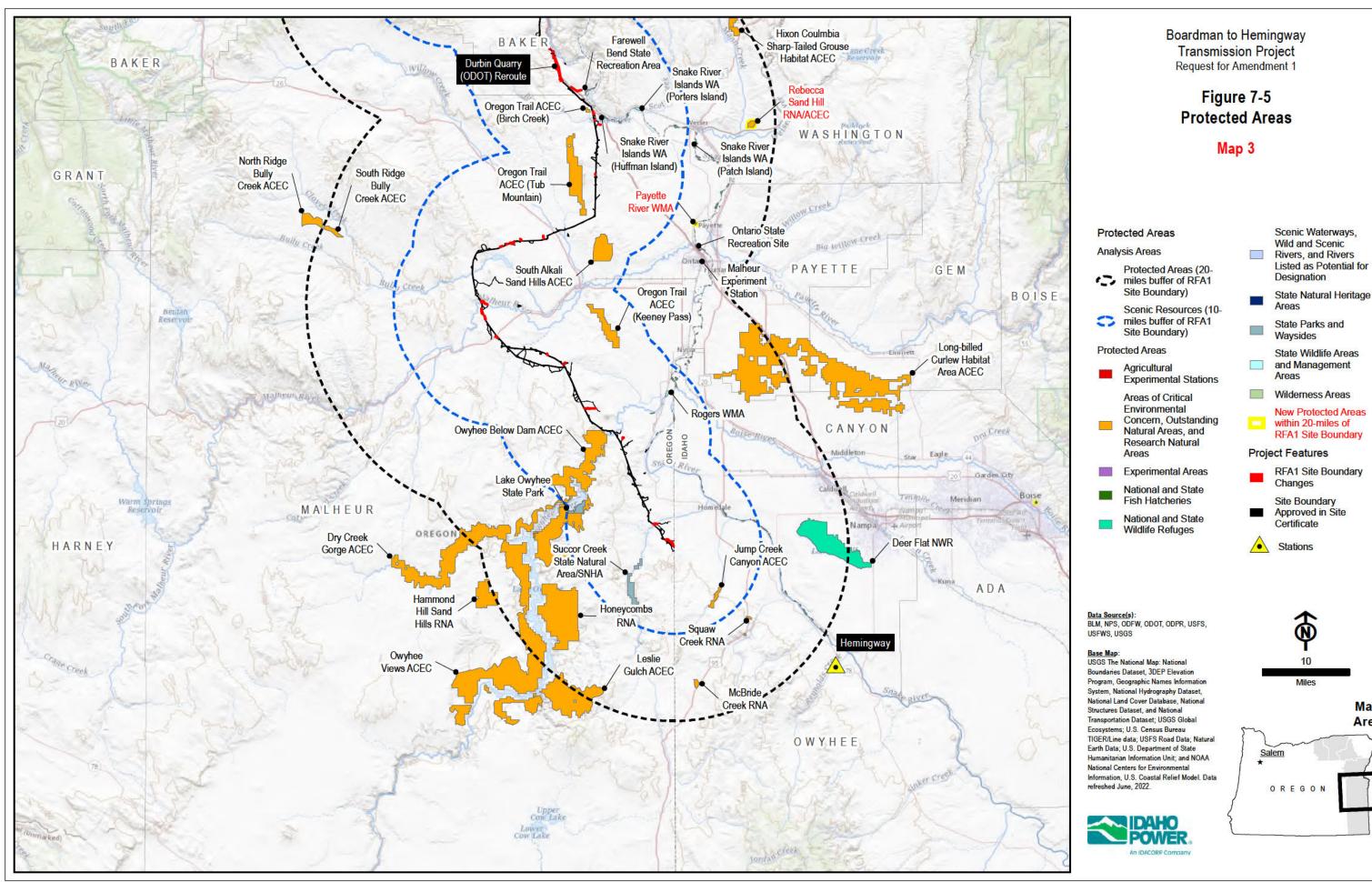






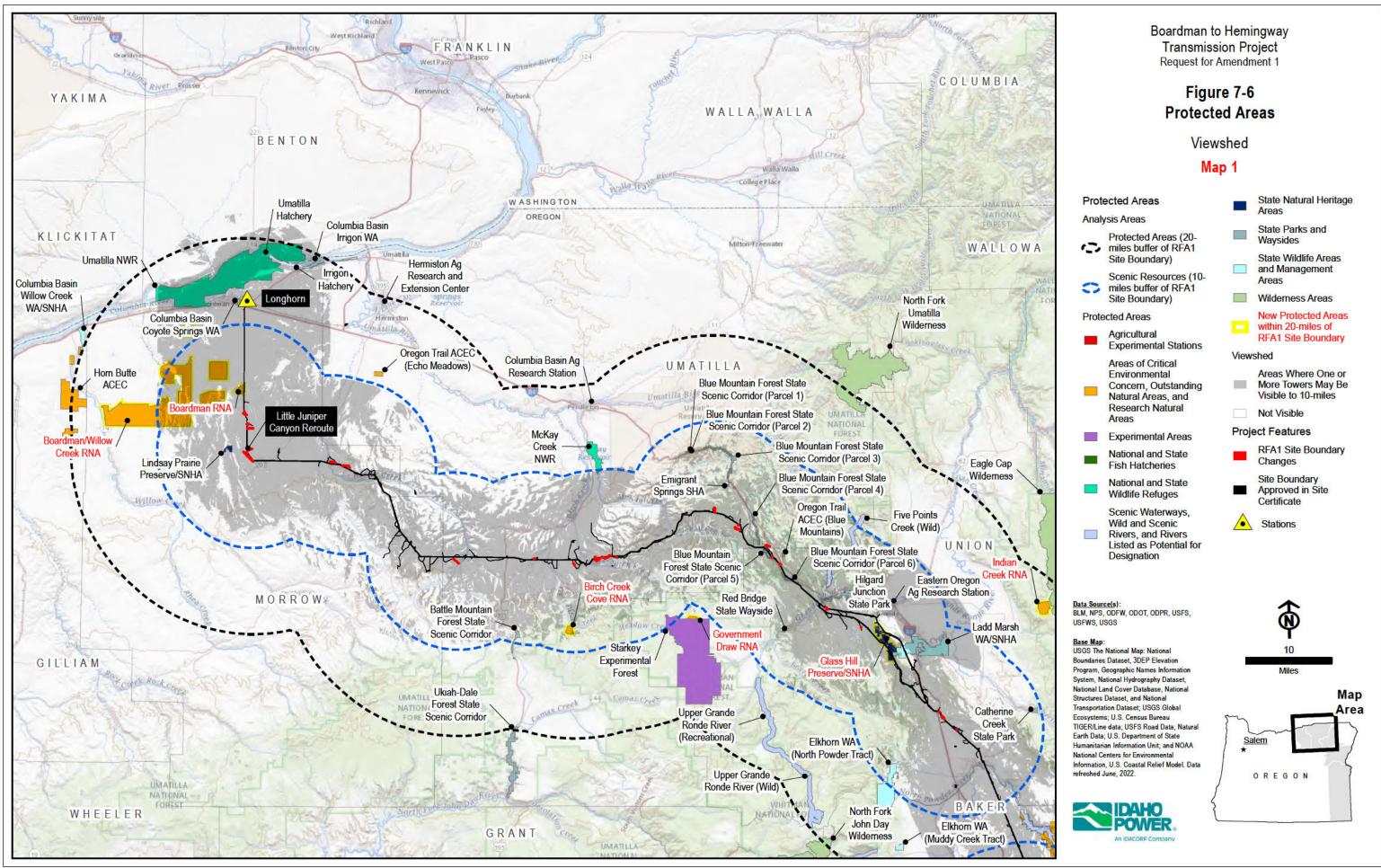


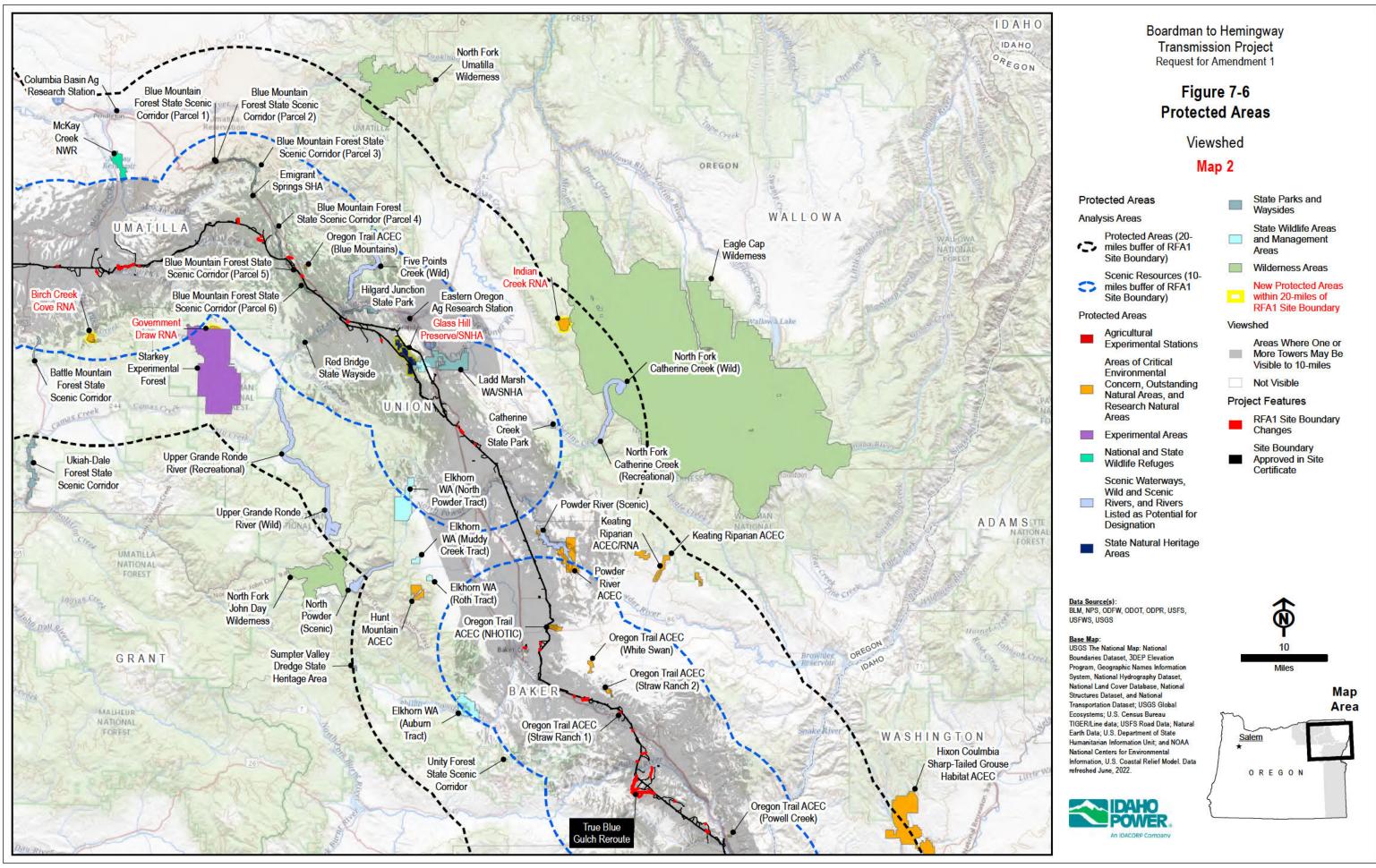


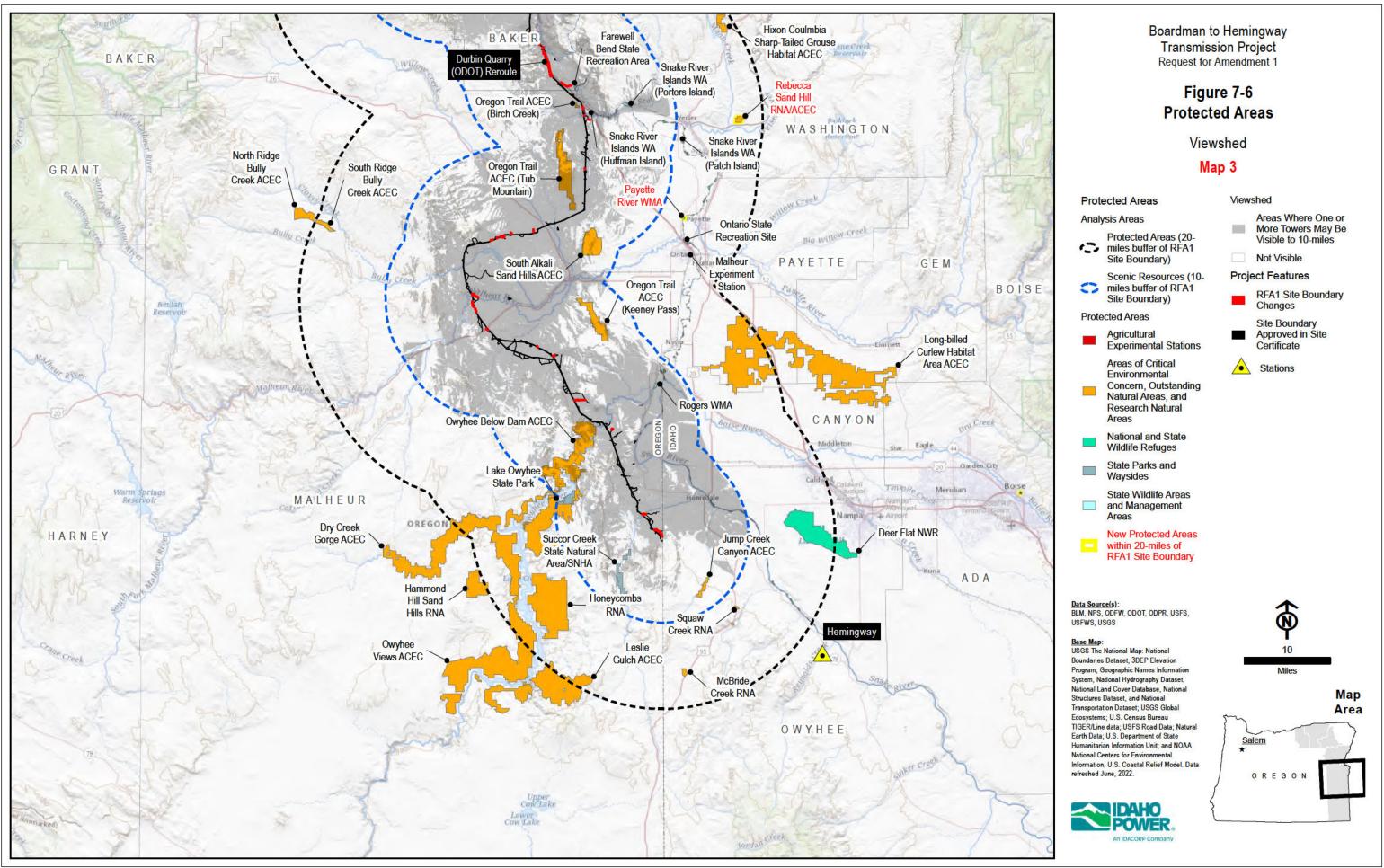


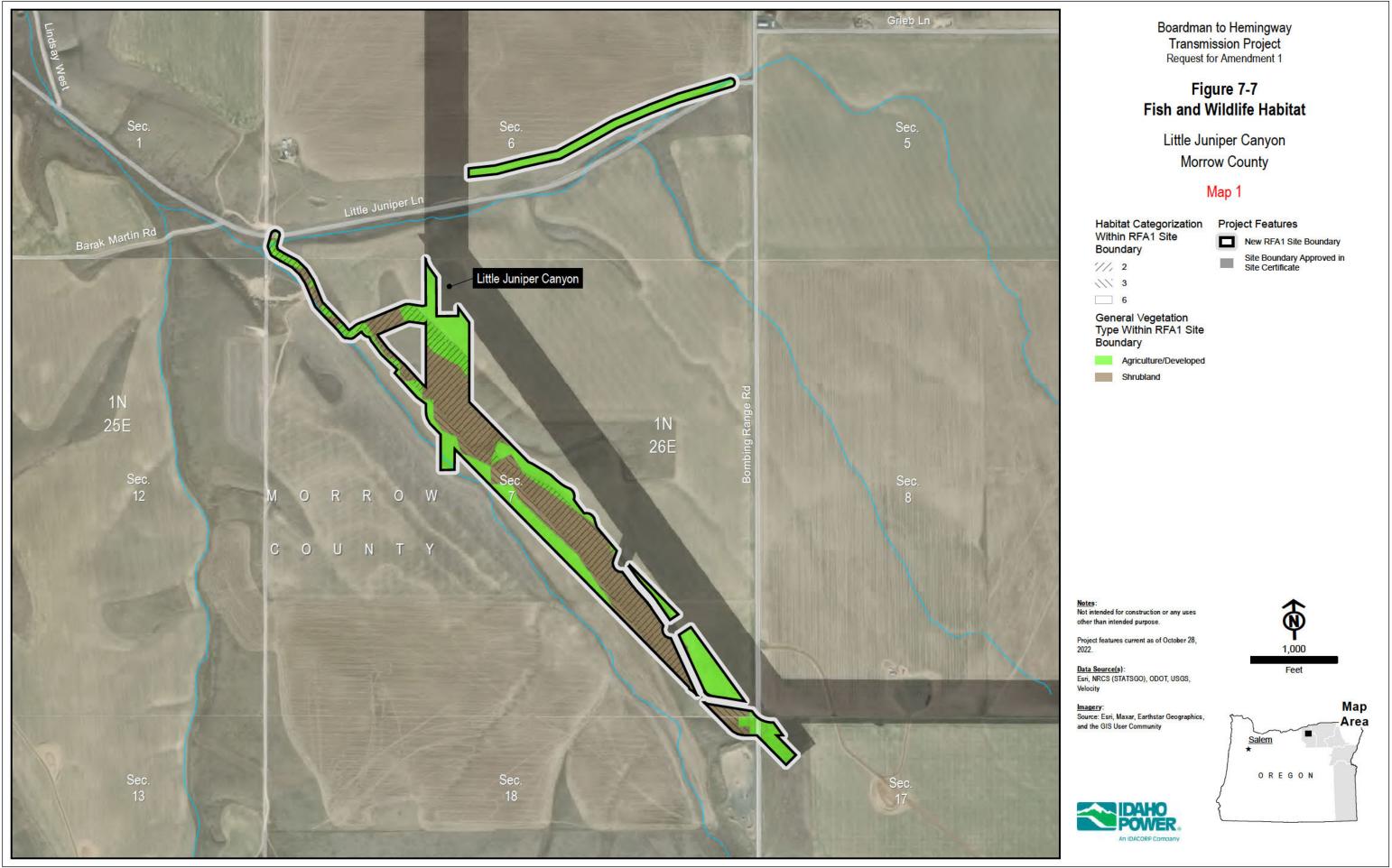
Map

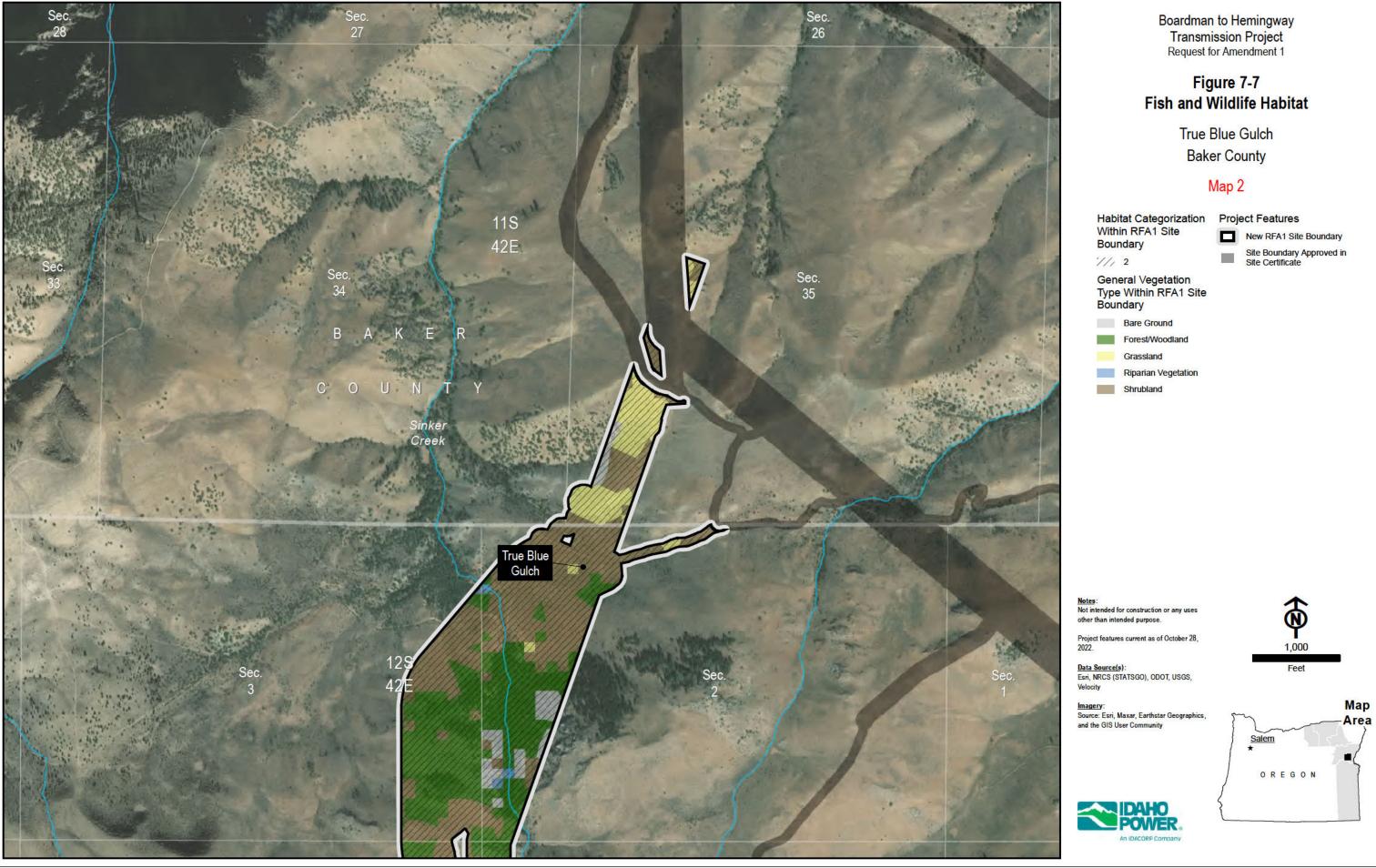
Area

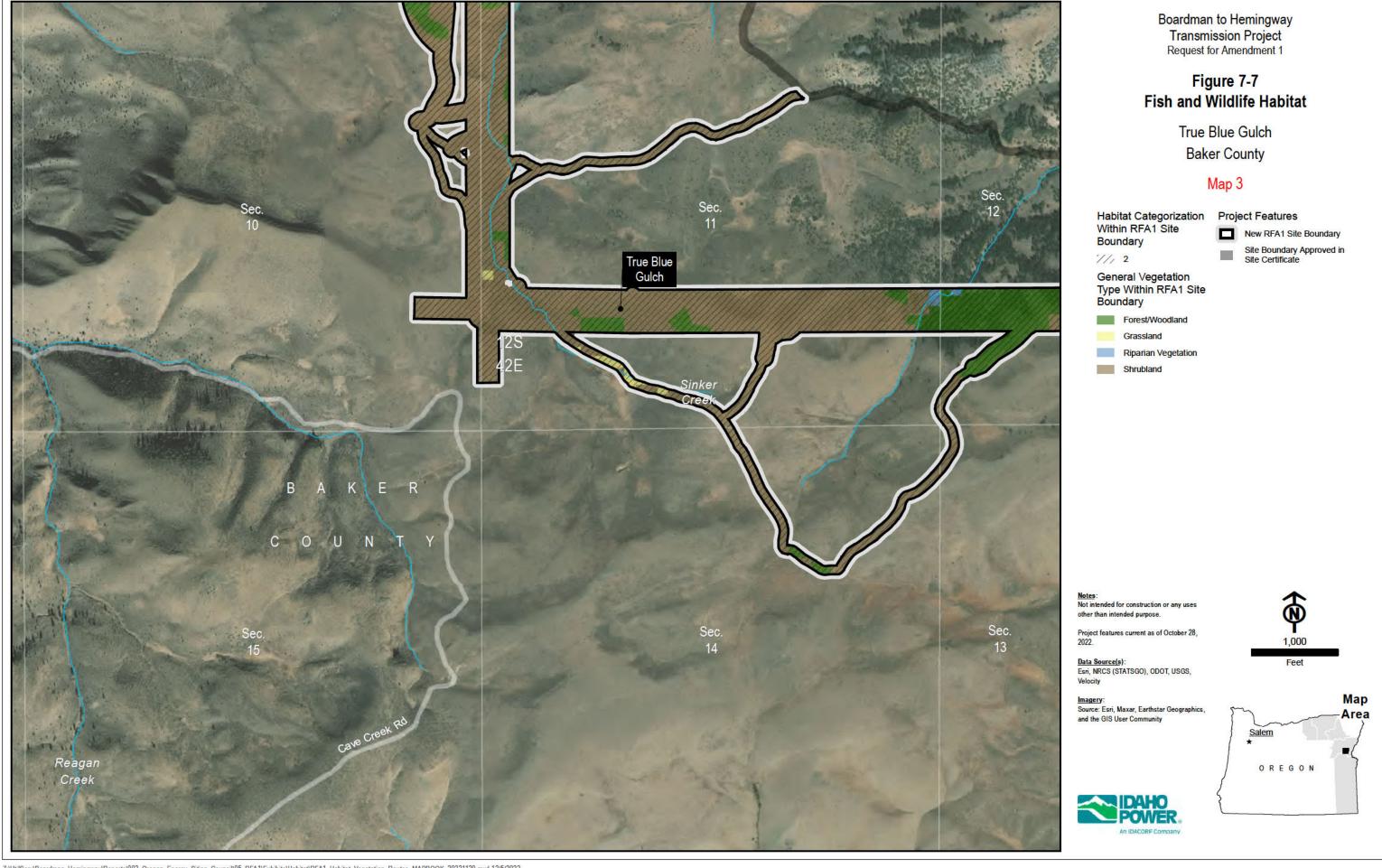


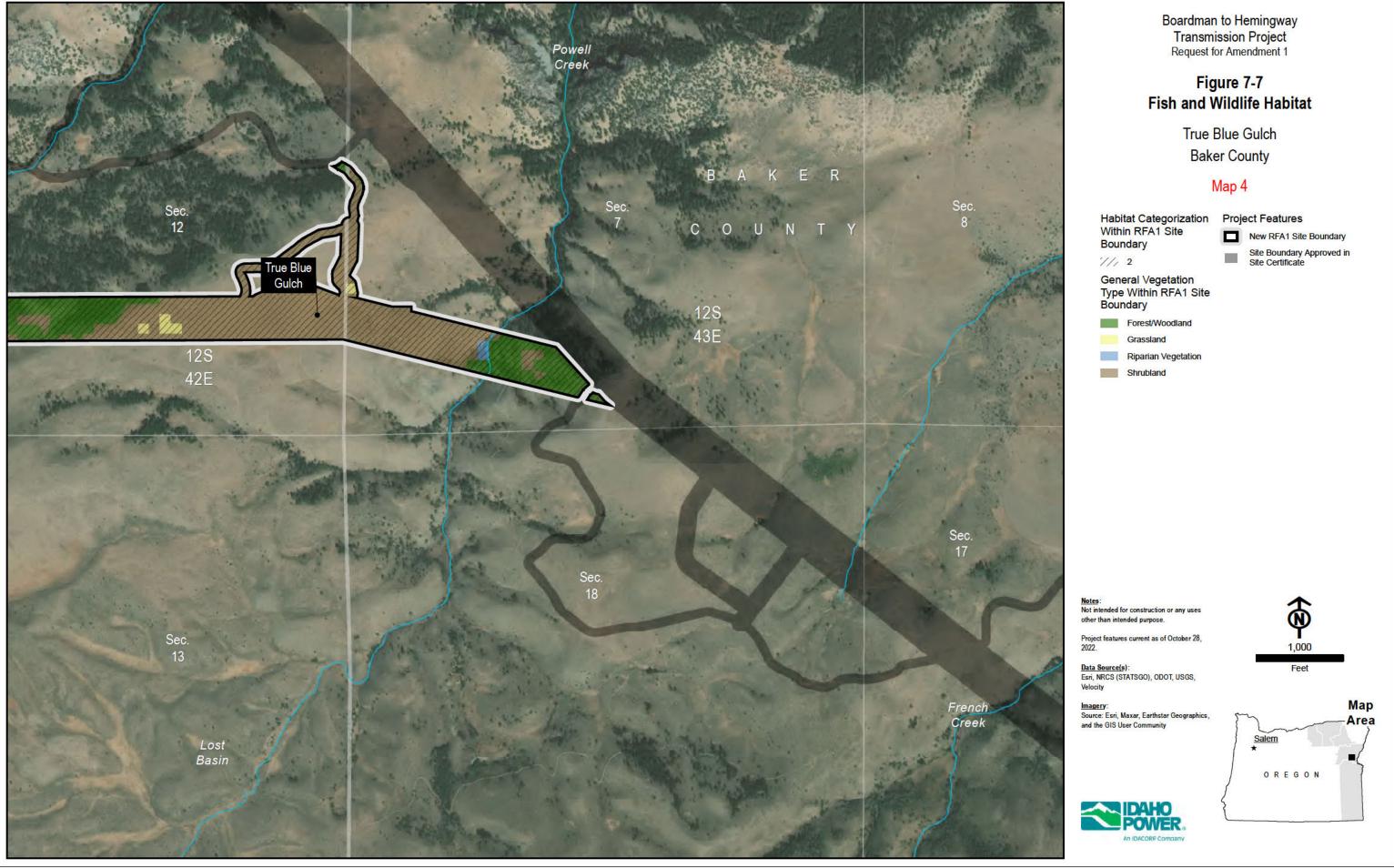














## Figure 7-7 Fish and Wildlife Habitat

**Durbin Quarry Baker County** 

### Map 5

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1, 2

General Vegetation Type Within RFA1 Site Boundary

Agriculture/Developed Grassland Shrubland

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Notes: Not intended for construction or any uses

Project features current as of October 28, 2022.

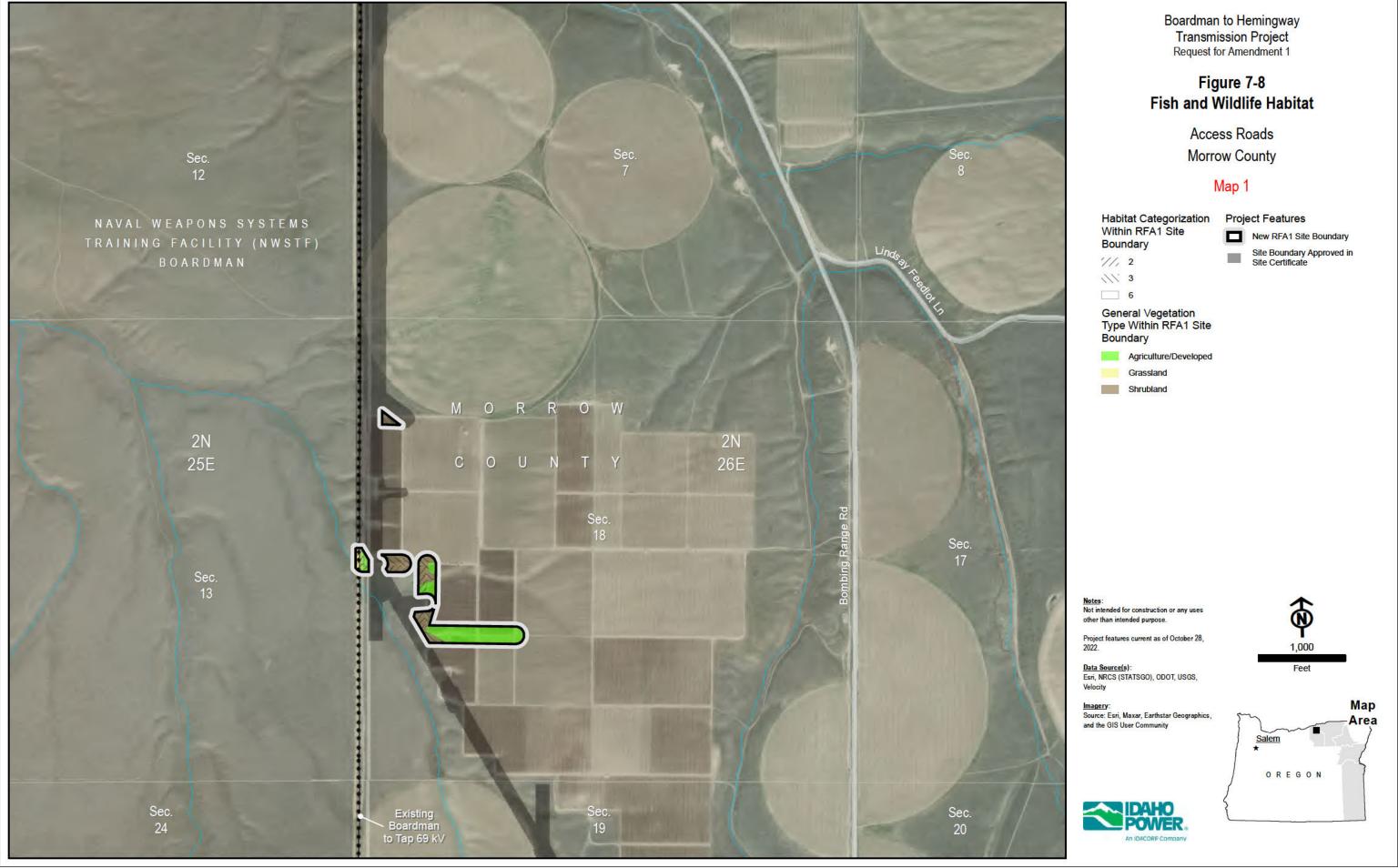
Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,















# Figure 7-8 Fish and Wildlife Habitat

Access Roads Morrow County

Map 3

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Habitat Categorization
Within RFA1 Site
Project Features
New RFA1 Site Boundary

111 3

6

General Vegetation Type Within RFA1 Site Boundary

Agriculture/Developed Shrubland

Not intended for construction or any uses

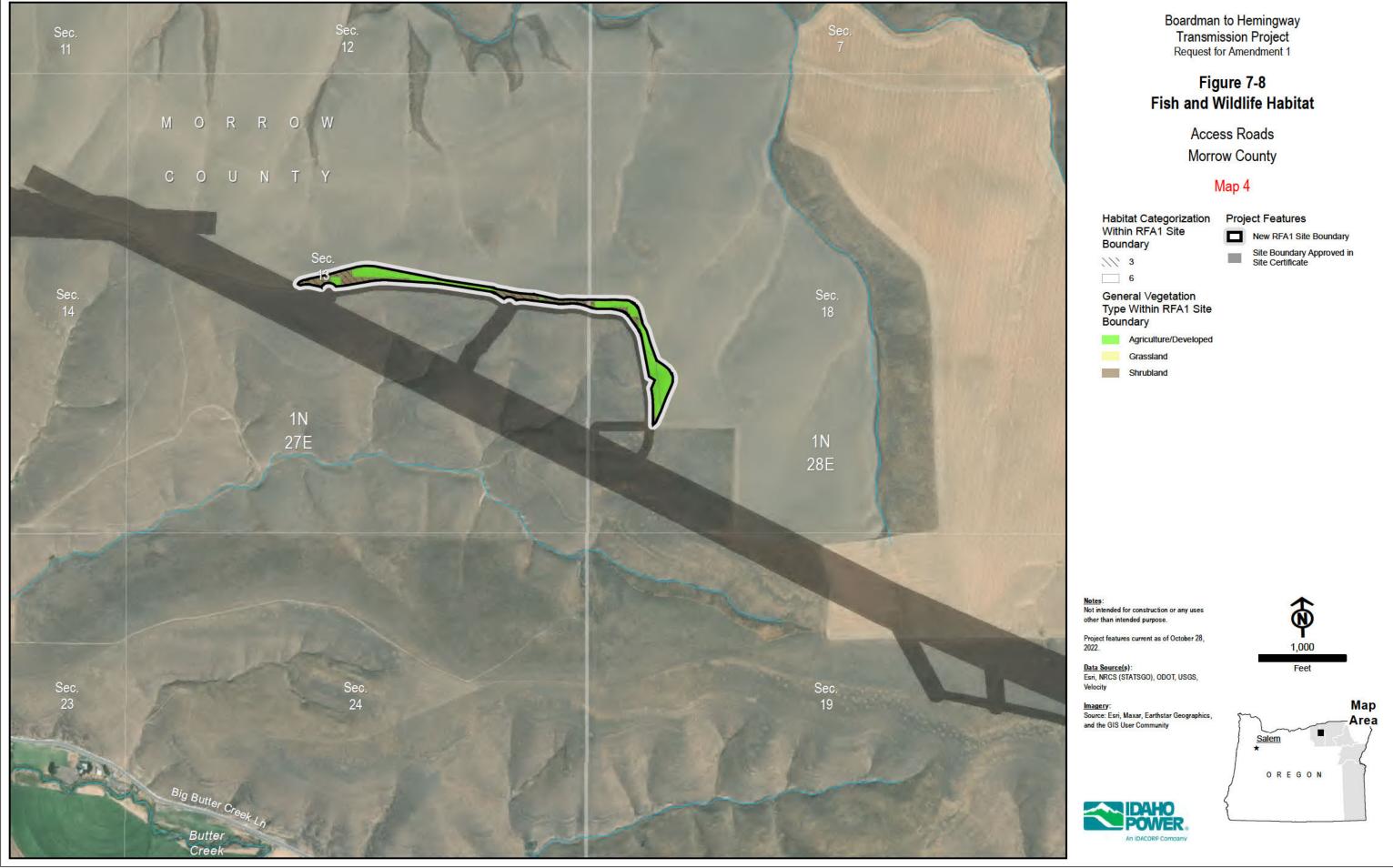
Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,











# Figure 7-8 Fish and Wildlife Habitat

Access Roads **Umatilla County** 

### Map 5

Habitat Categorization
Within RFA1 Site
Project Features
New RFA1 Site Boundary

1/1, 2

General Vegetation Type Within RFA1 Site Boundary

Agriculture/Developed Grassland

Shrubland

New RFA1 Site Boundary

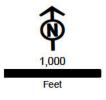
Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

### lmagery:









# Figure 7-8 Fish and Wildlife Habitat

Access Roads **Umatilla County** 

### Map 6

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1 2

General ∀egetation Type Within RFA1 Site Boundary

Shrubland

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

lmagery:









# Figure 7-8 Fish and Wildlife Habitat

Access Roads **Umatilla County** 

Map 7

Habitat Categorization
Within RFA1 Site
Project Features
New RFA1 Site Boundary

1/1 2

General ∀egetation Type Within RFA1 Site Boundary

Grassland Shrubland

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,









# Figure 7-8 Fish and Wildlife Habitat

Access Roads **Umatilla County** 

### Map 8

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Habitat Categorization
Within RFA1 Site
Project Features
New RFA1 Site Boundary

1/1 2

General ∀egetation Type Within RFA1 Site Boundary

Grassland

Shrubland

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

### Imagery:









## Figure 7-8 Fish and Wildlife Habitat

Access Roads **Umatilla County** 

### Map 9

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1, 2

General Vegetation Type Within RFA1 Site Boundary

Agriculture/Developed

Grassland Shrubland

Not intended for construction or any uses

Project features current as of October 28, 2022.

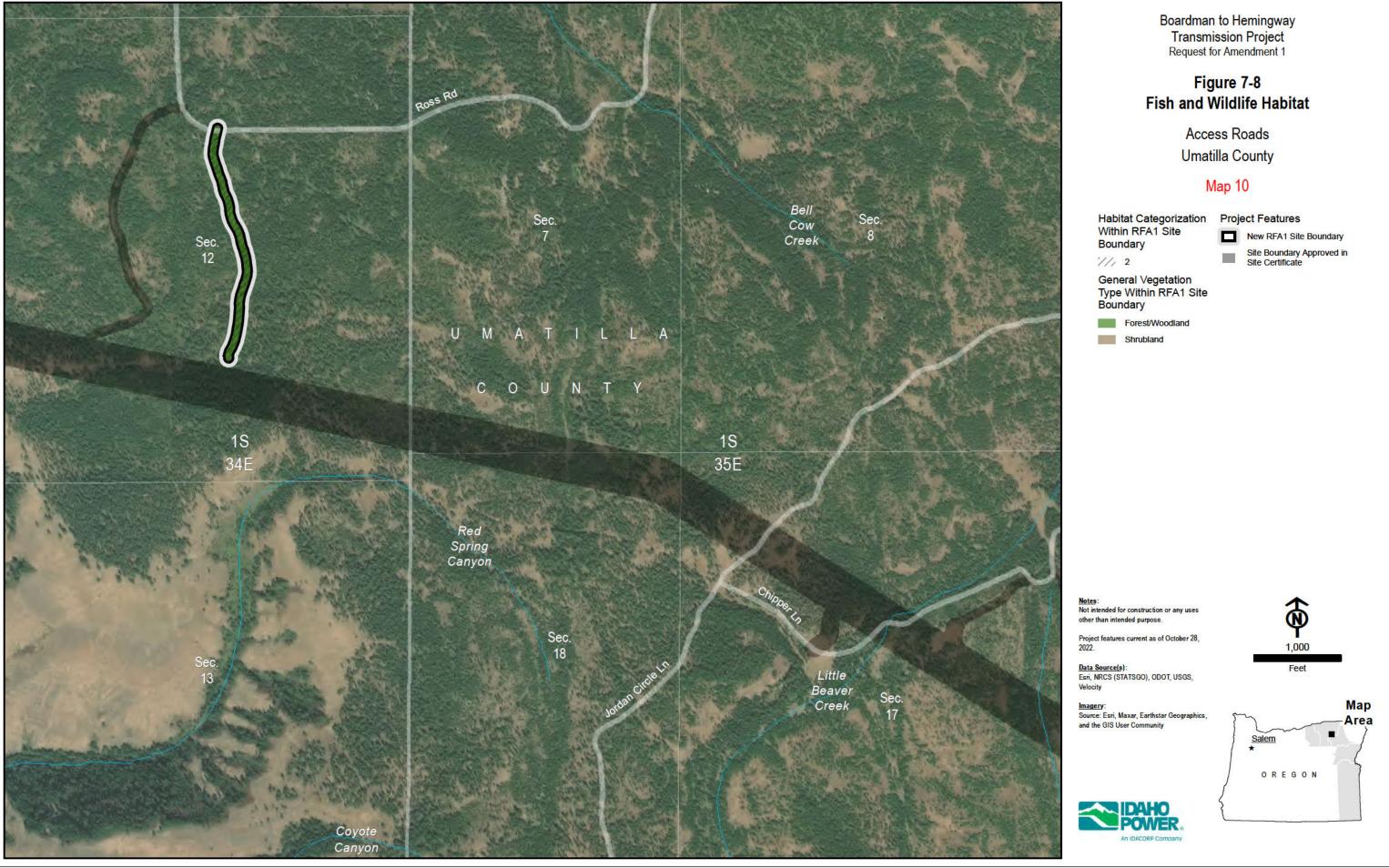
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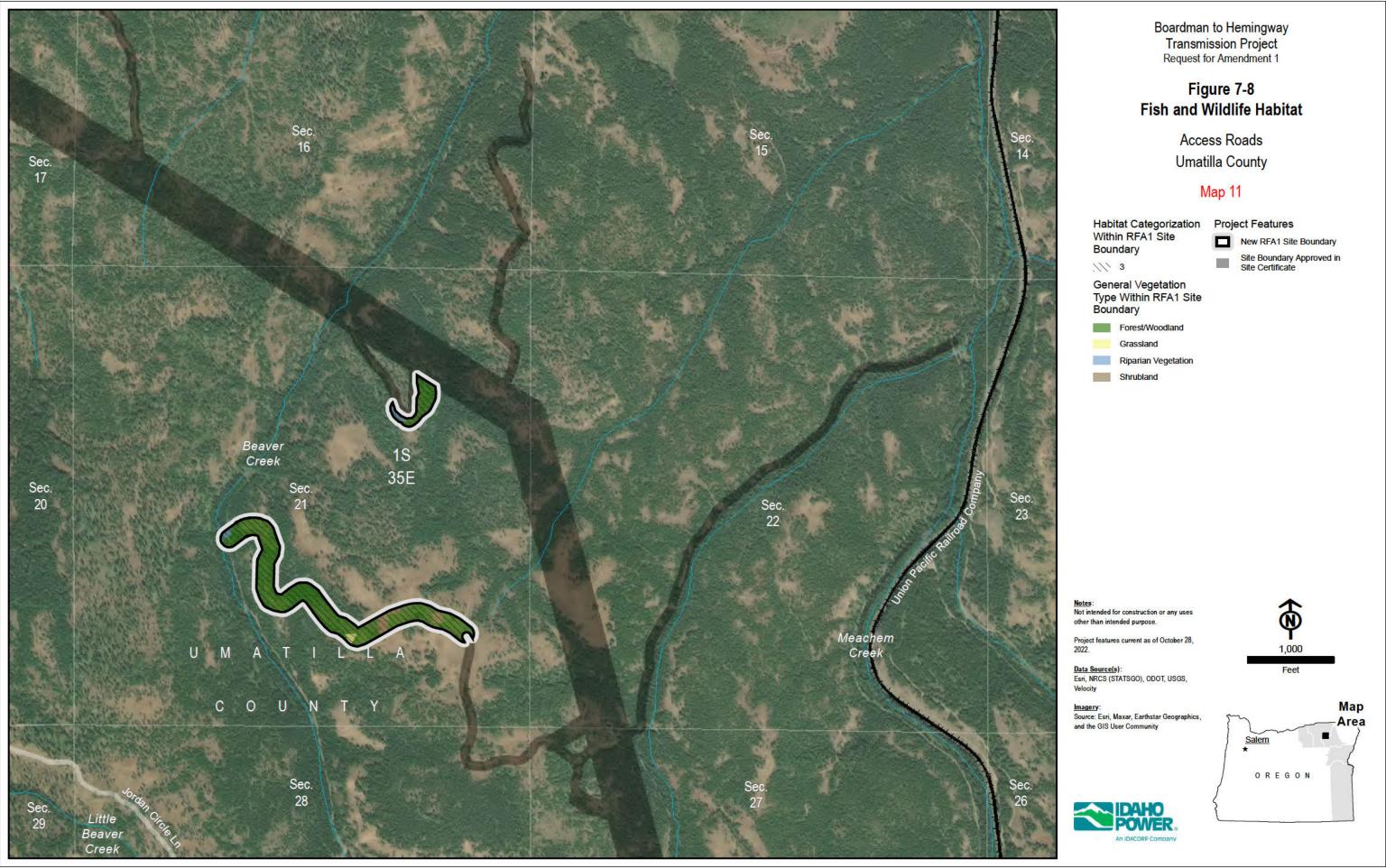
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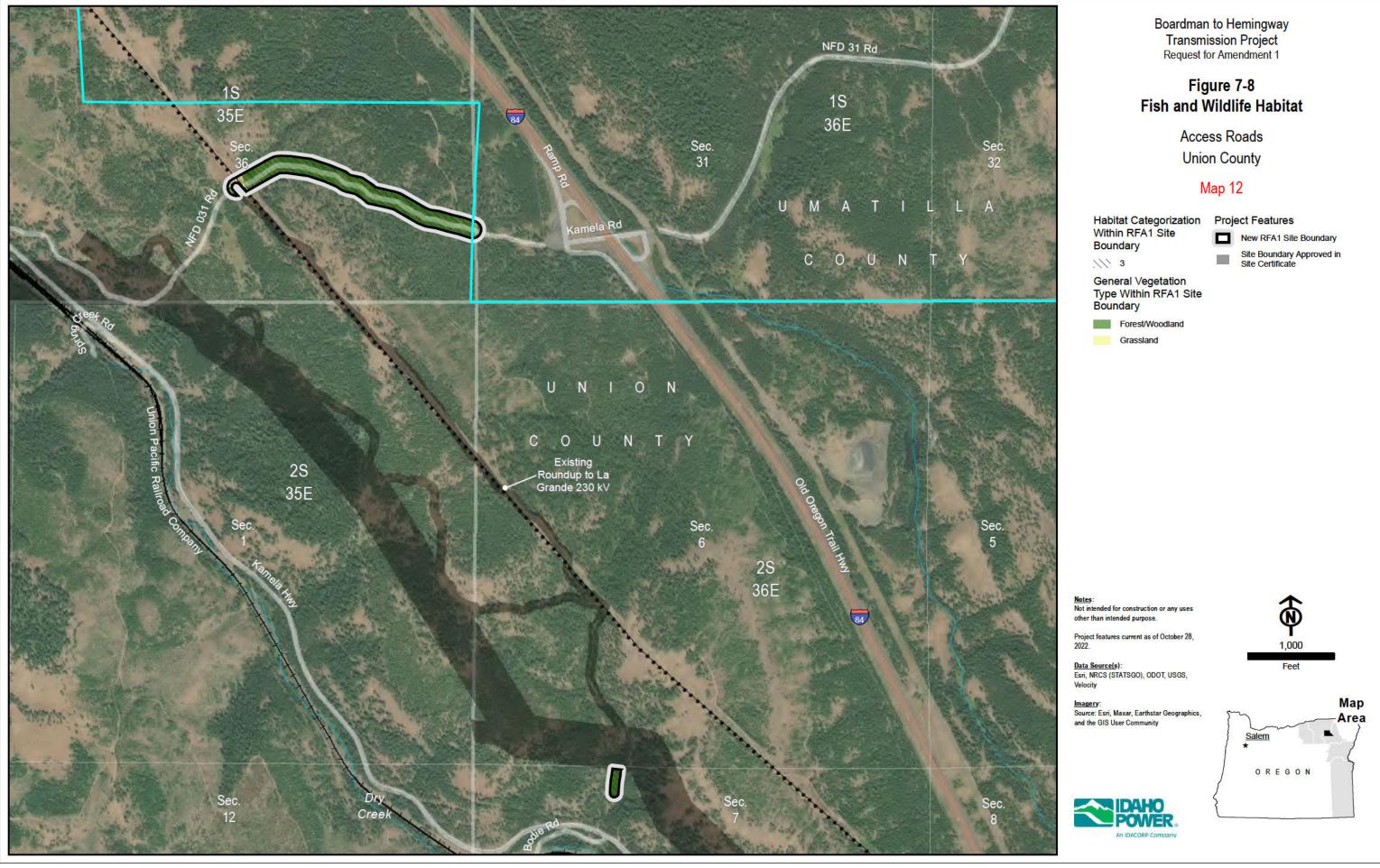


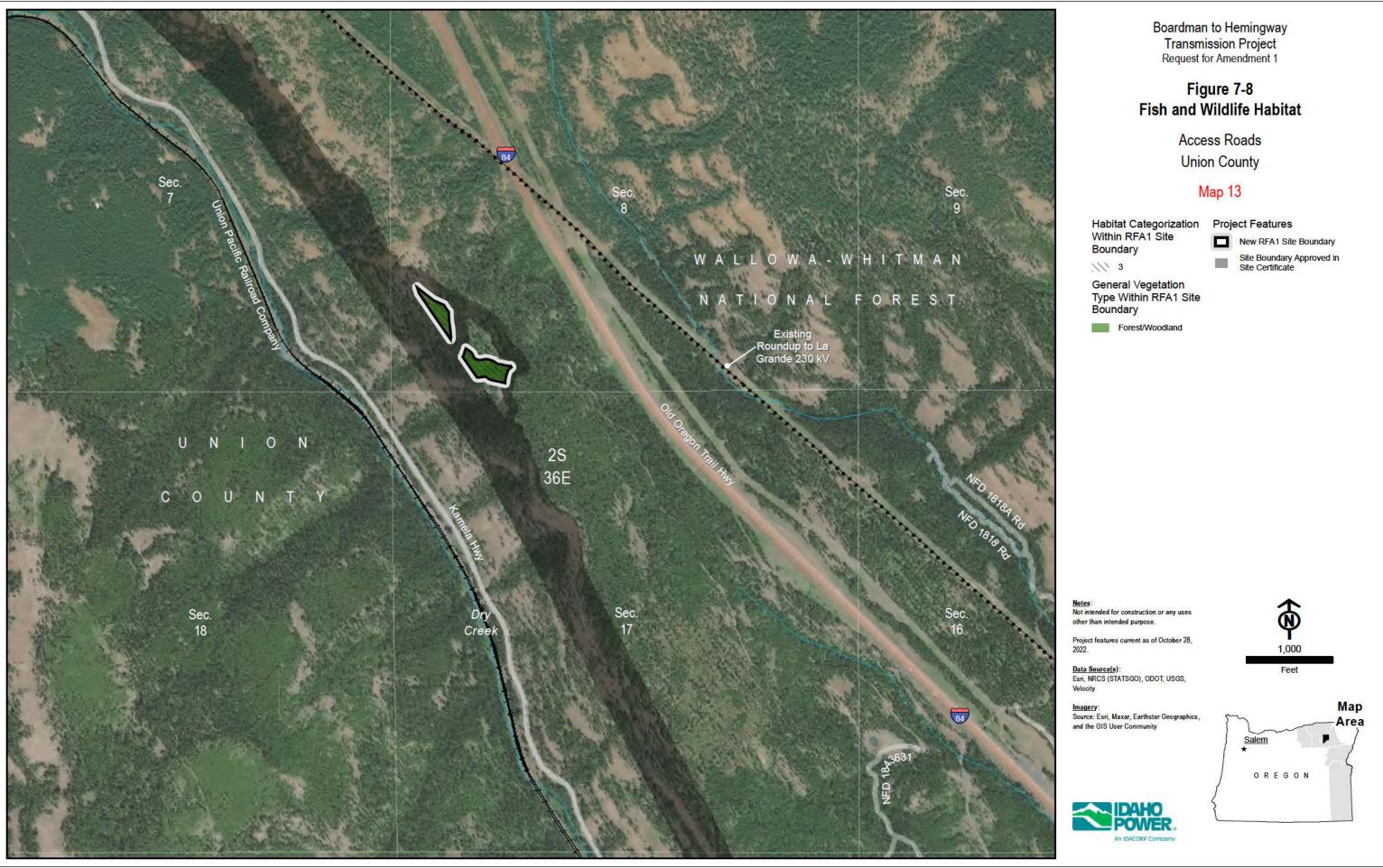


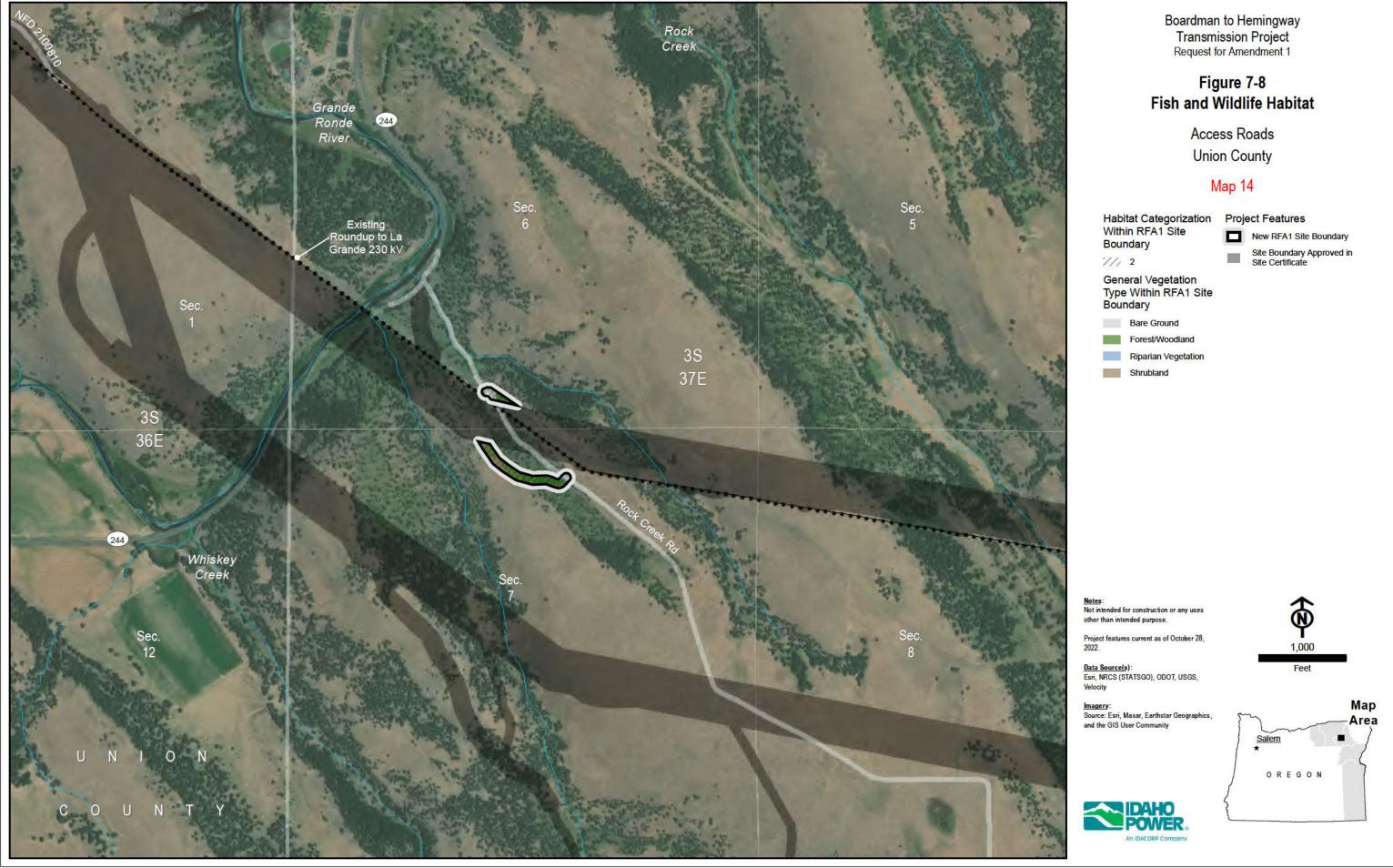










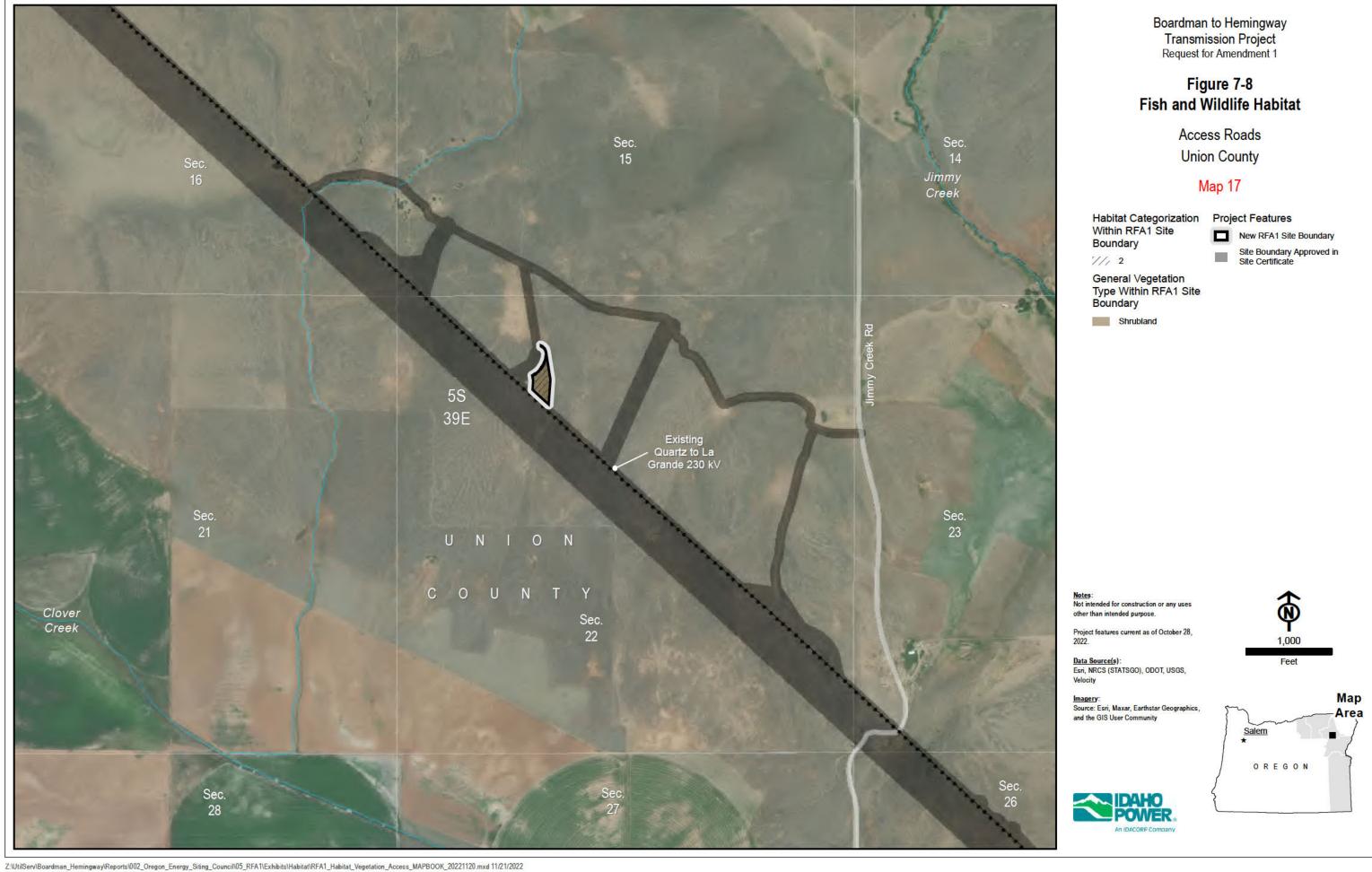


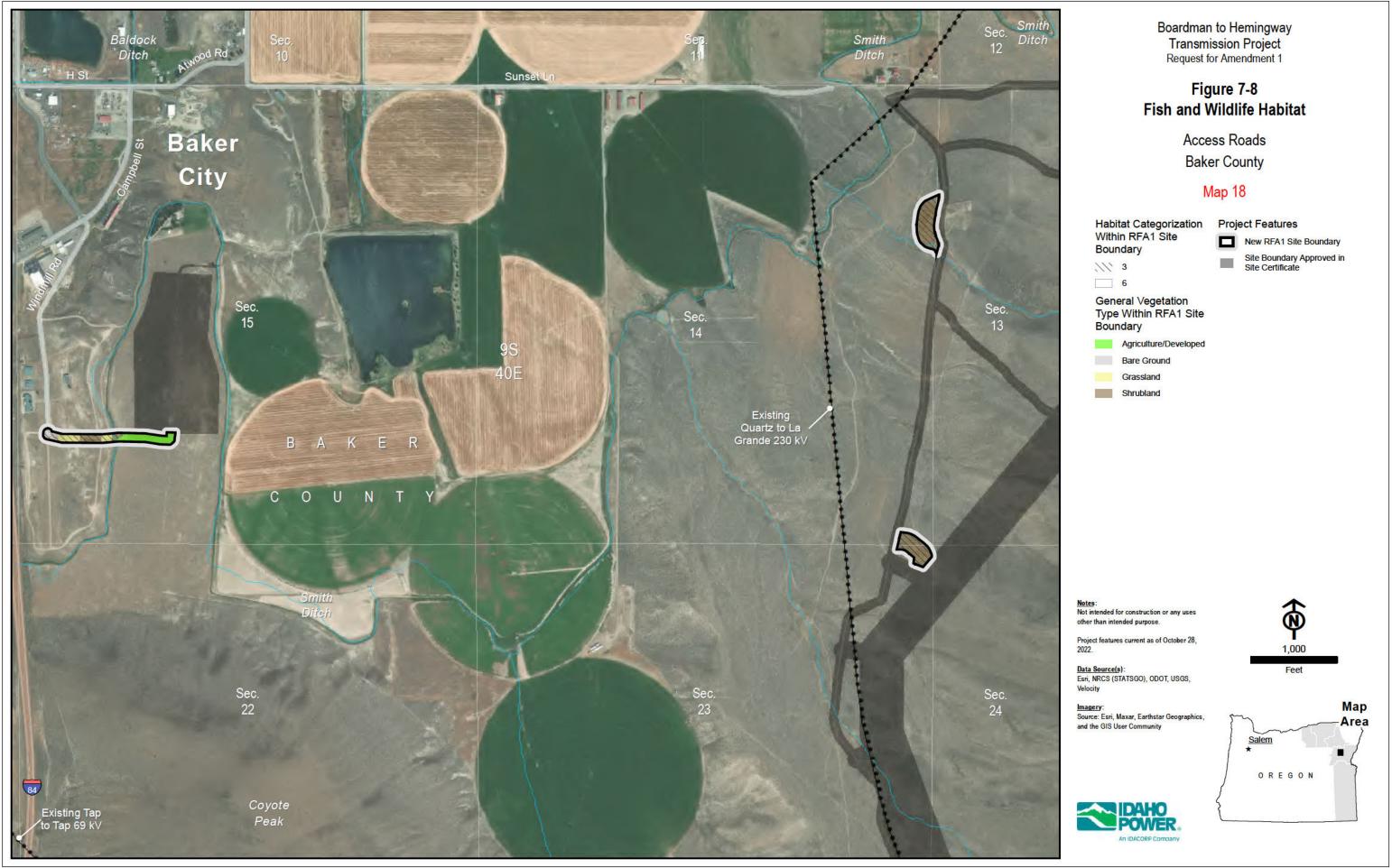


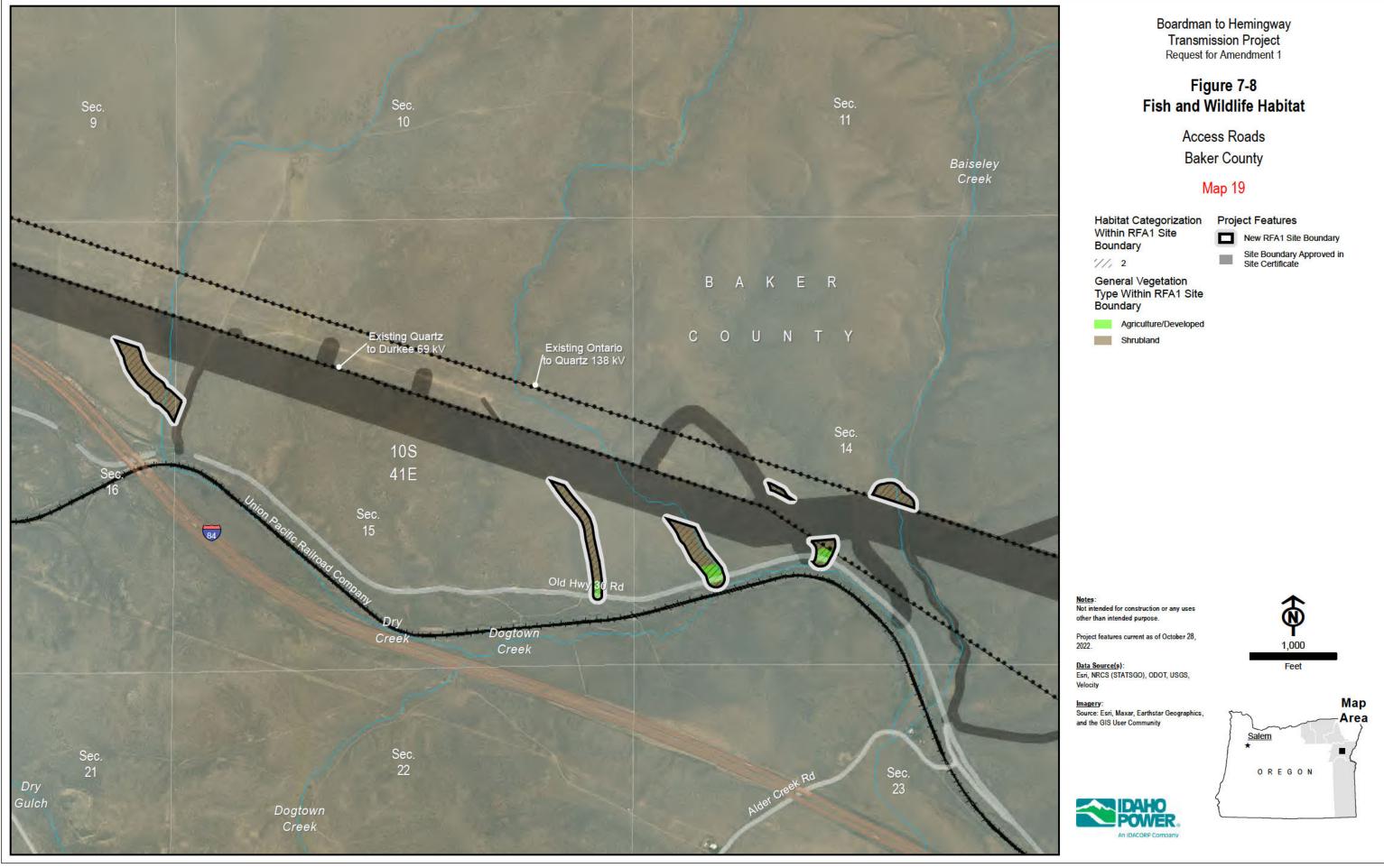


Map

Area









# Figure 7-8 Fish and Wildlife Habitat

Access Roads **Baker County** 

Map 20

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1 2

General ∀egetation Type Within RFA1 Site Boundary

Shrubland

New RFA1 Site Boundary Site Boundary Approved in Site Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

Imagery:

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Map Area <u>Salem</u>
★ OREGON





# Figure 7-8 Fish and Wildlife Habitat

Access Roads **Baker County** 

Map 21

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1 2

General ∀egetation Type Within RFA1 Site Boundary

Shrubland

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

Imagery:









# Figure 7-8 Fish and Wildlife Habitat

Access Roads **Baker County** 

Map 22

Habitat Categorization
Within RFA1 Site

Project Features

New RFA1 Site Boundary

1/1 2

General ∀egetation Type Within RFA1 Site Boundary

Grassland Shrubland

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

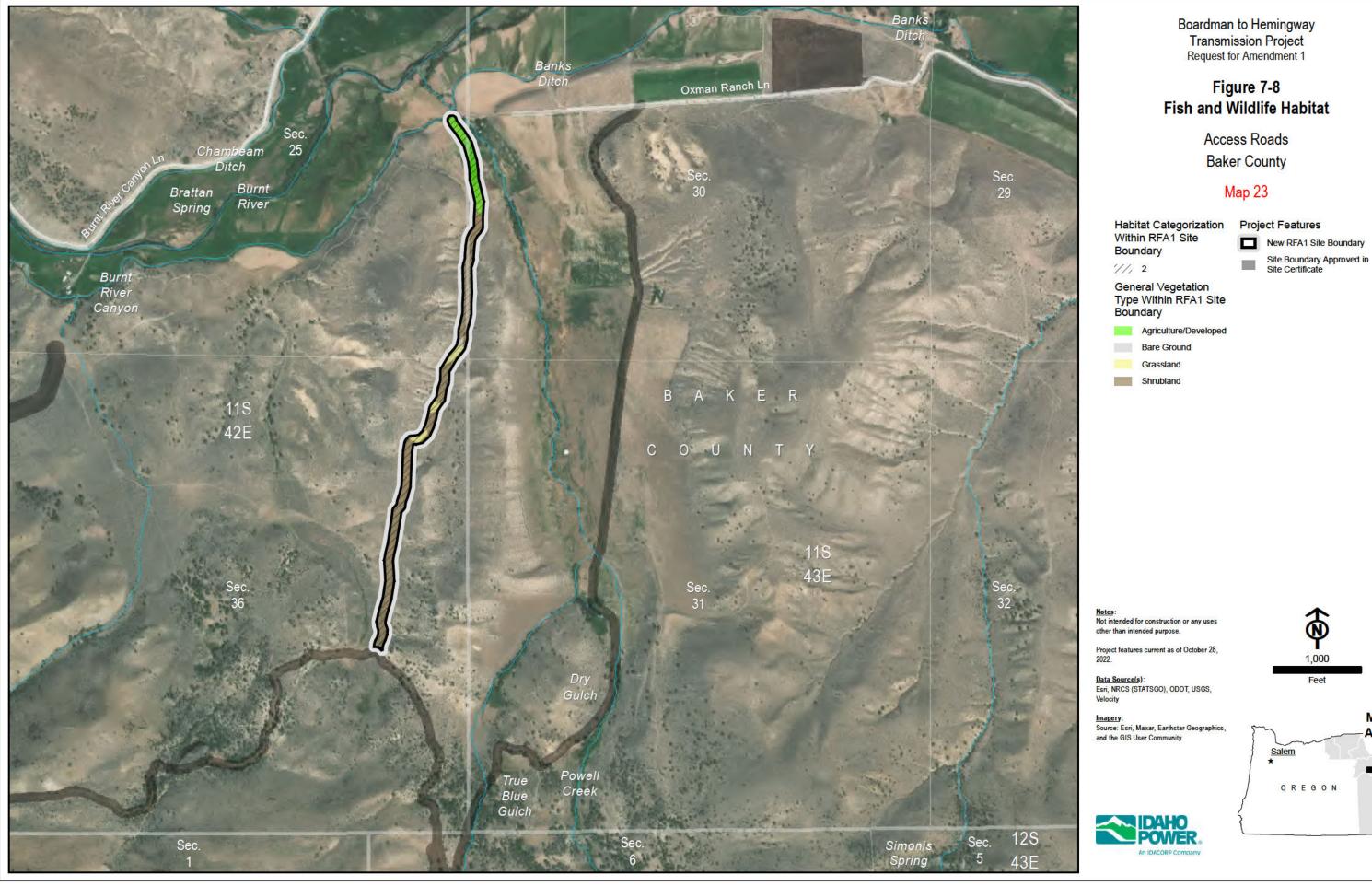
Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,









Map

Area



# Figure 7-8 Fish and Wildlife Habitat

Access Roads **Baker County** 

Map 24

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1 2

General ∀egetation Type Within RFA1 Site Boundary

Shrubland

Not intended for construction or any uses

Project features current as of October 28, 2022.

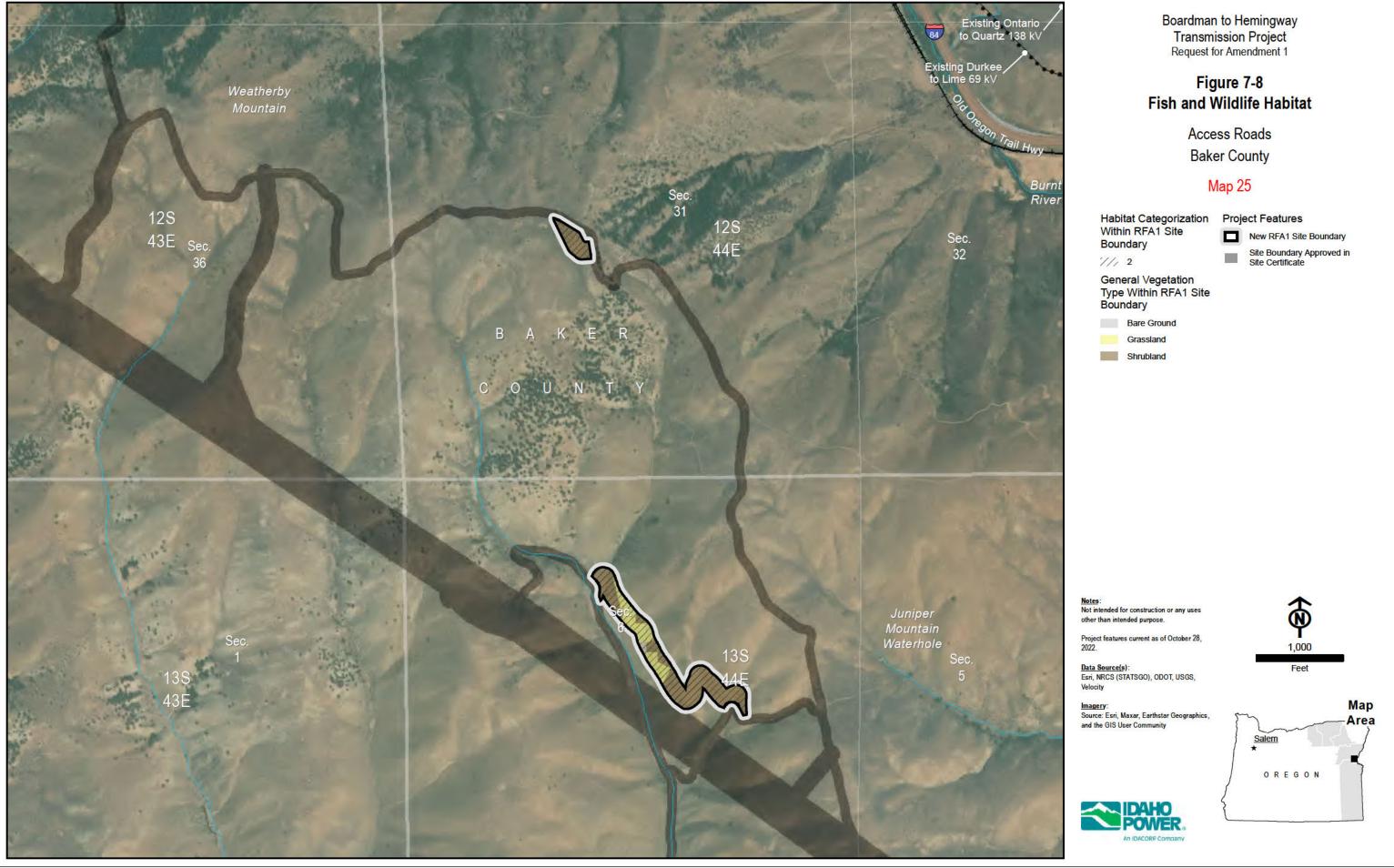
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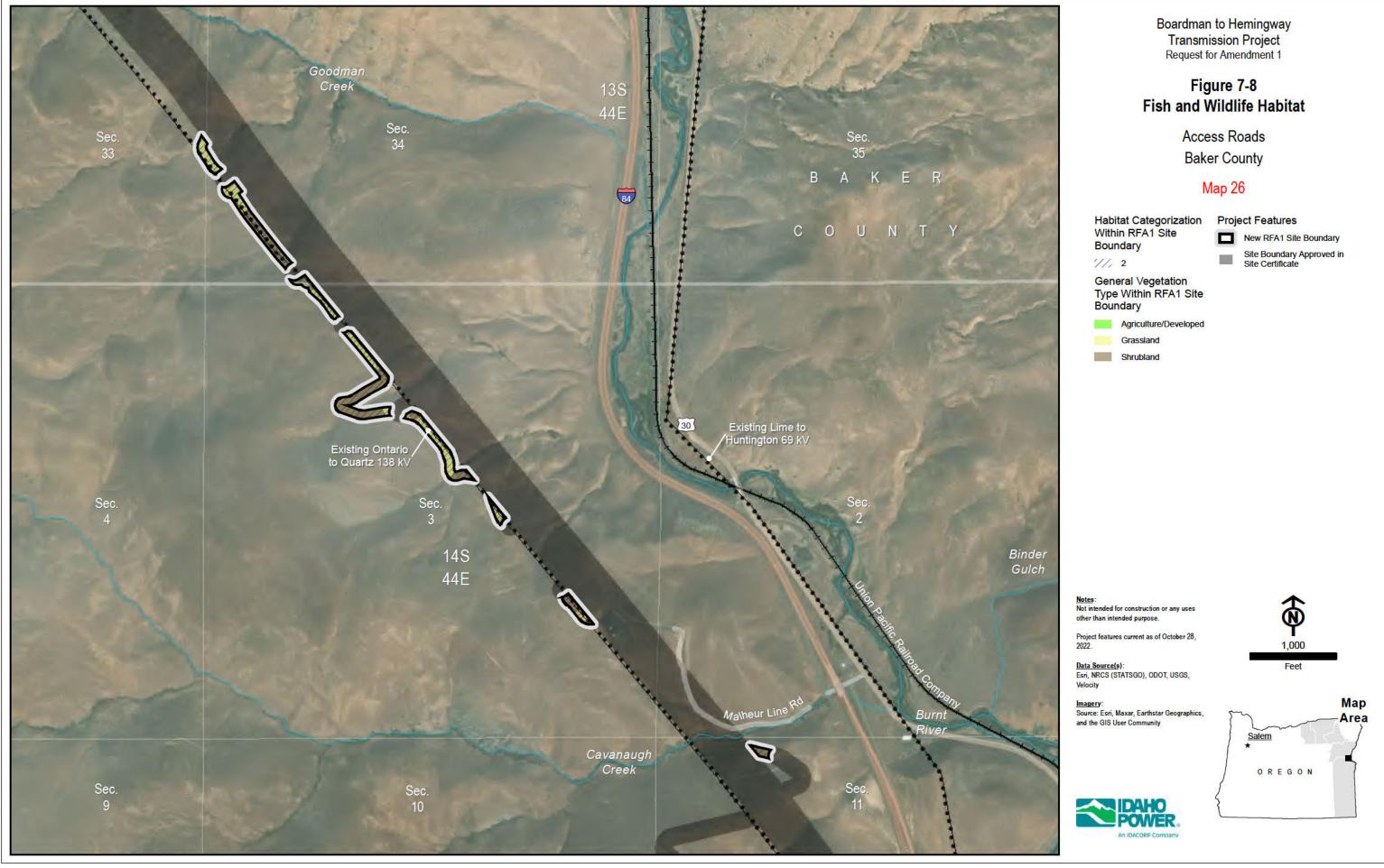
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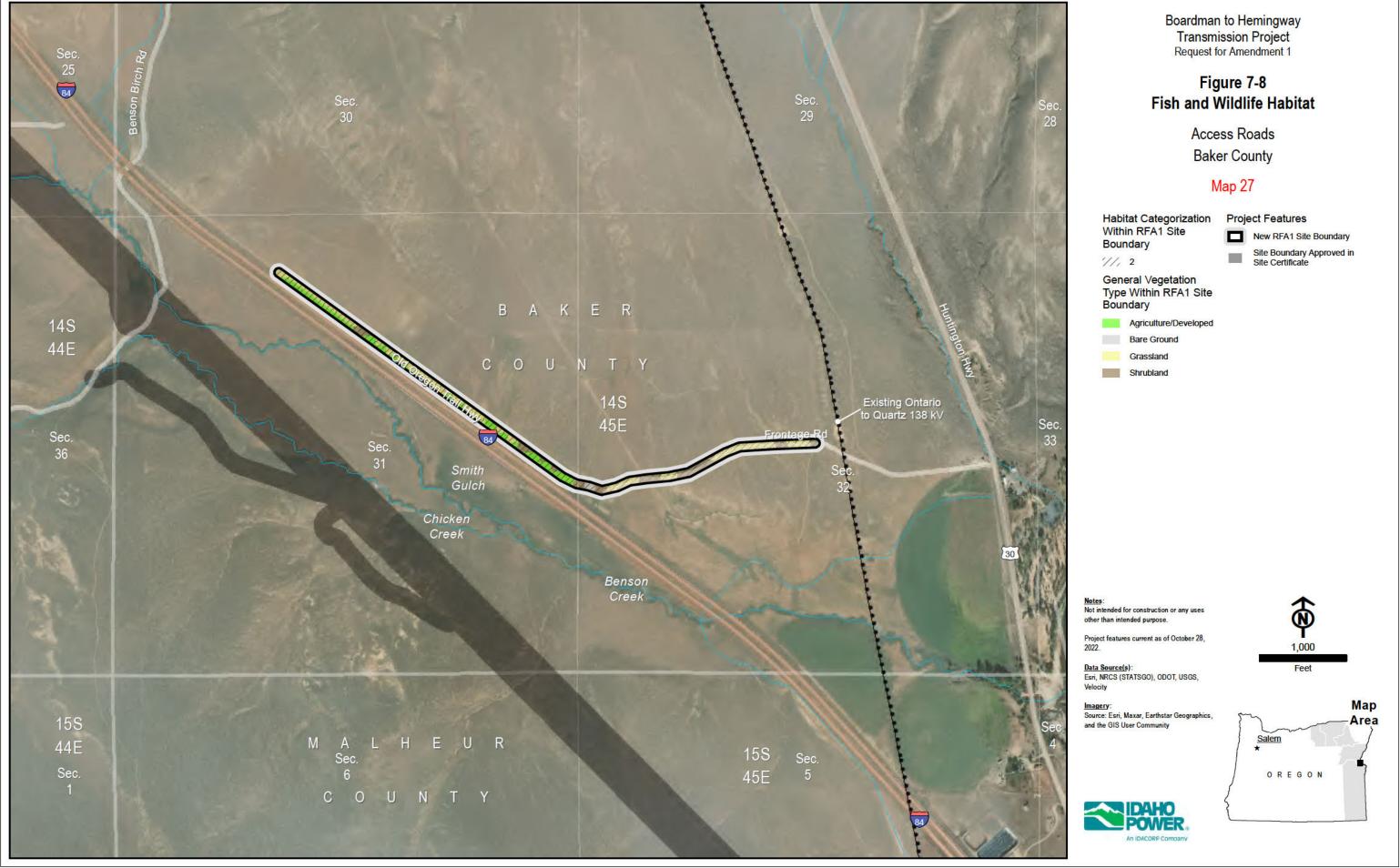














# Figure 7-8 Fish and Wildlife Habitat

Access Roads Malheur County

Map 28

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1, 2

General Vegetation Type Within RFA1 Site Boundary

Agriculture/Developed Bare Ground Grassland

Shrubland

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

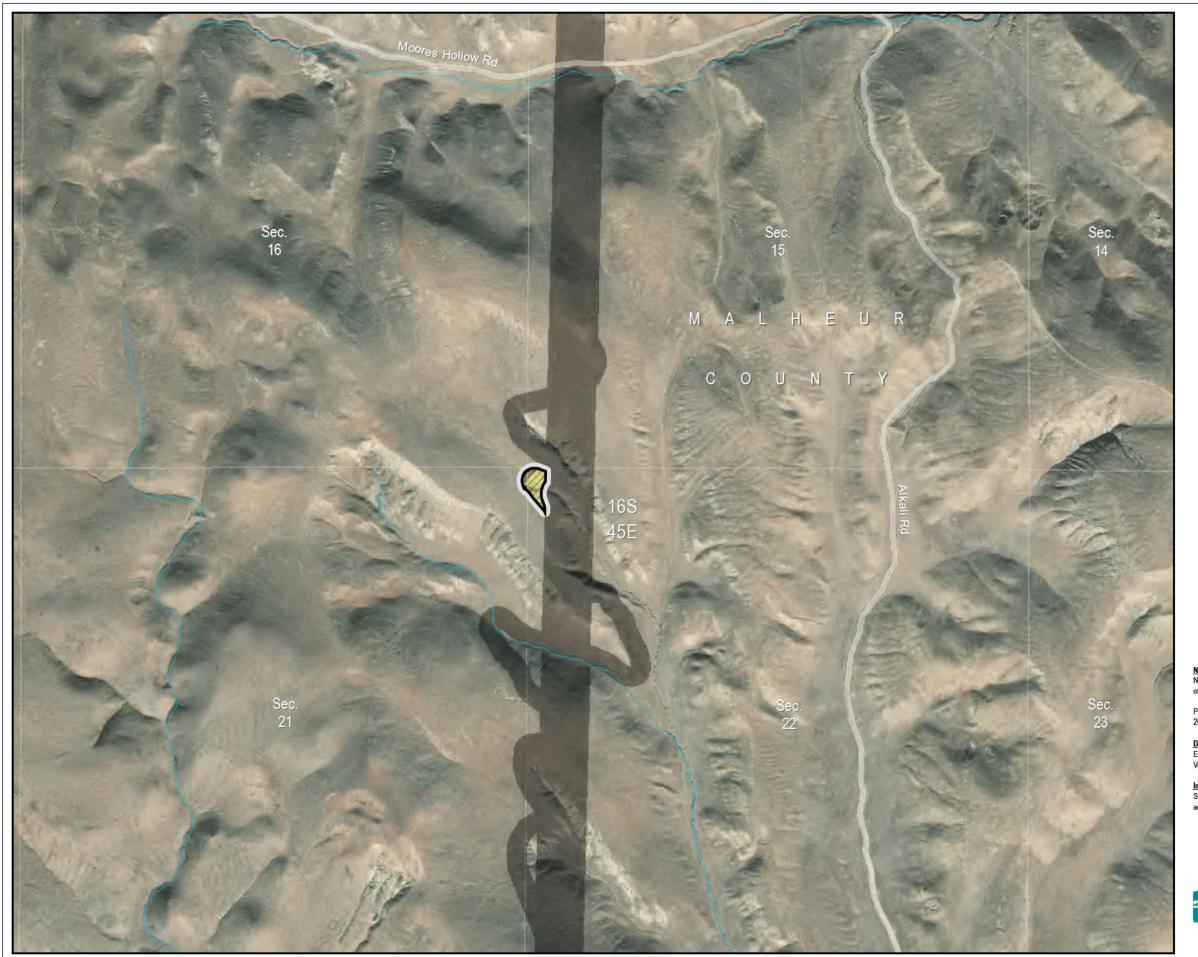
Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,









# Figure 7-8 Fish and Wildlife Habitat

Access Roads Malheur County

Map 29

Habitat Categorization
Within RFA1 Site

Project Features

New RFA1 Site Boundary

1/1 2

General ∀egetation Type Within RFA1 Site Boundary

Grassland Shrubland

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

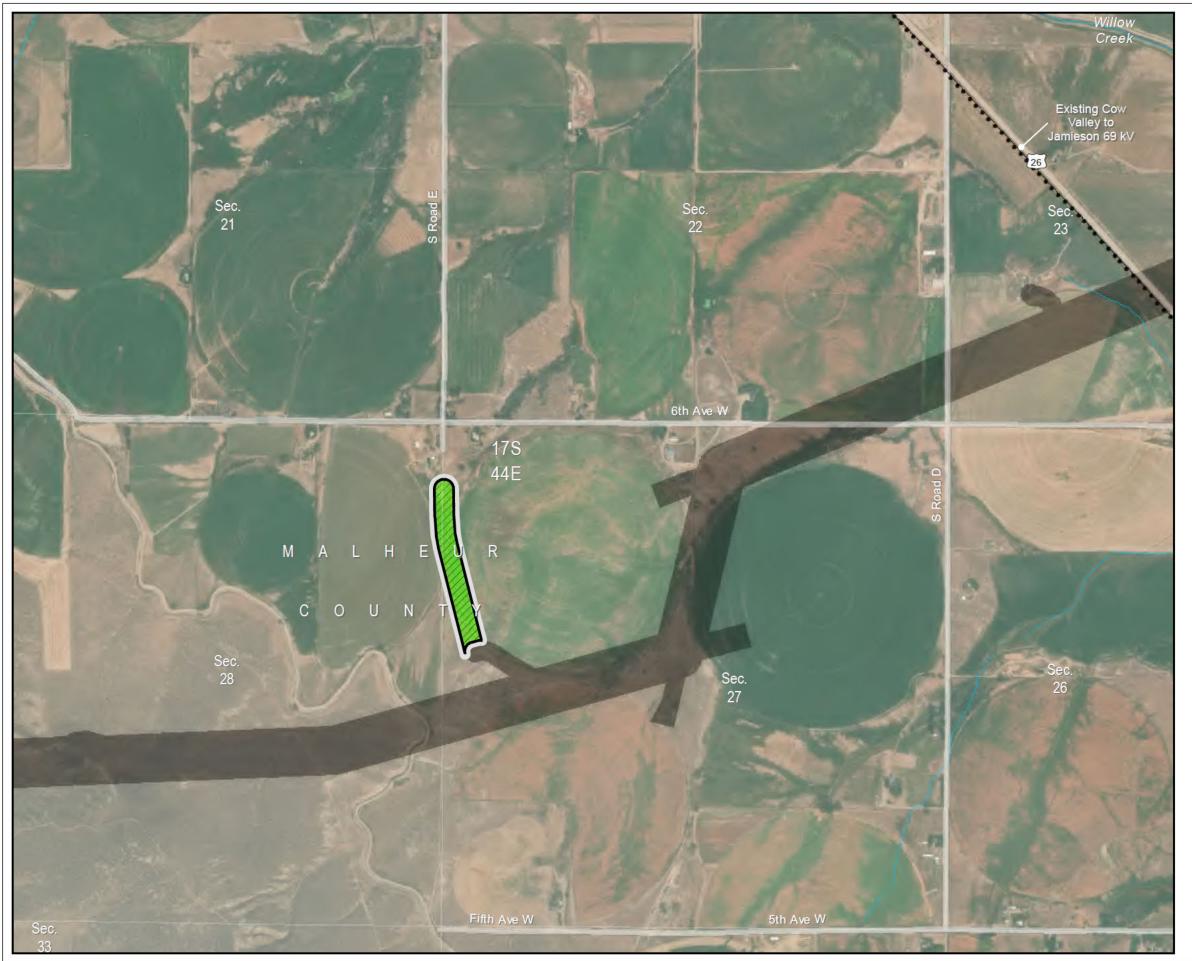
Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Map Area OREGON





# Figure 7-8 Fish and Wildlife Habitat

Access Roads Malheur County

Map 30

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1, 2

General Vegetation Type Within RFA1 Site Boundary

Agriculture/Developed

New RFA1 Site Boundary

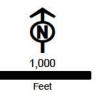
Site Boundary Approved in Site Certificate

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

Imagery:









# Figure 7-8 Fish and Wildlife Habitat

Access Roads Malheur County

Map 31

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1 2

General ∀egetation Type Within RFA1 Site Boundary

Grassland

Shrubland

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

lmagery:

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Map Area <u>Salem</u>
★ OREGON





# Figure 7-8 Fish and Wildlife Habitat

Access Roads Malheur County

Map 32

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1 2

General ∀egetation Type Within RFA1 Site Boundary

Bare Ground Grassland

Shrubland

Not intended for construction or any uses

Project features current as of October 28,

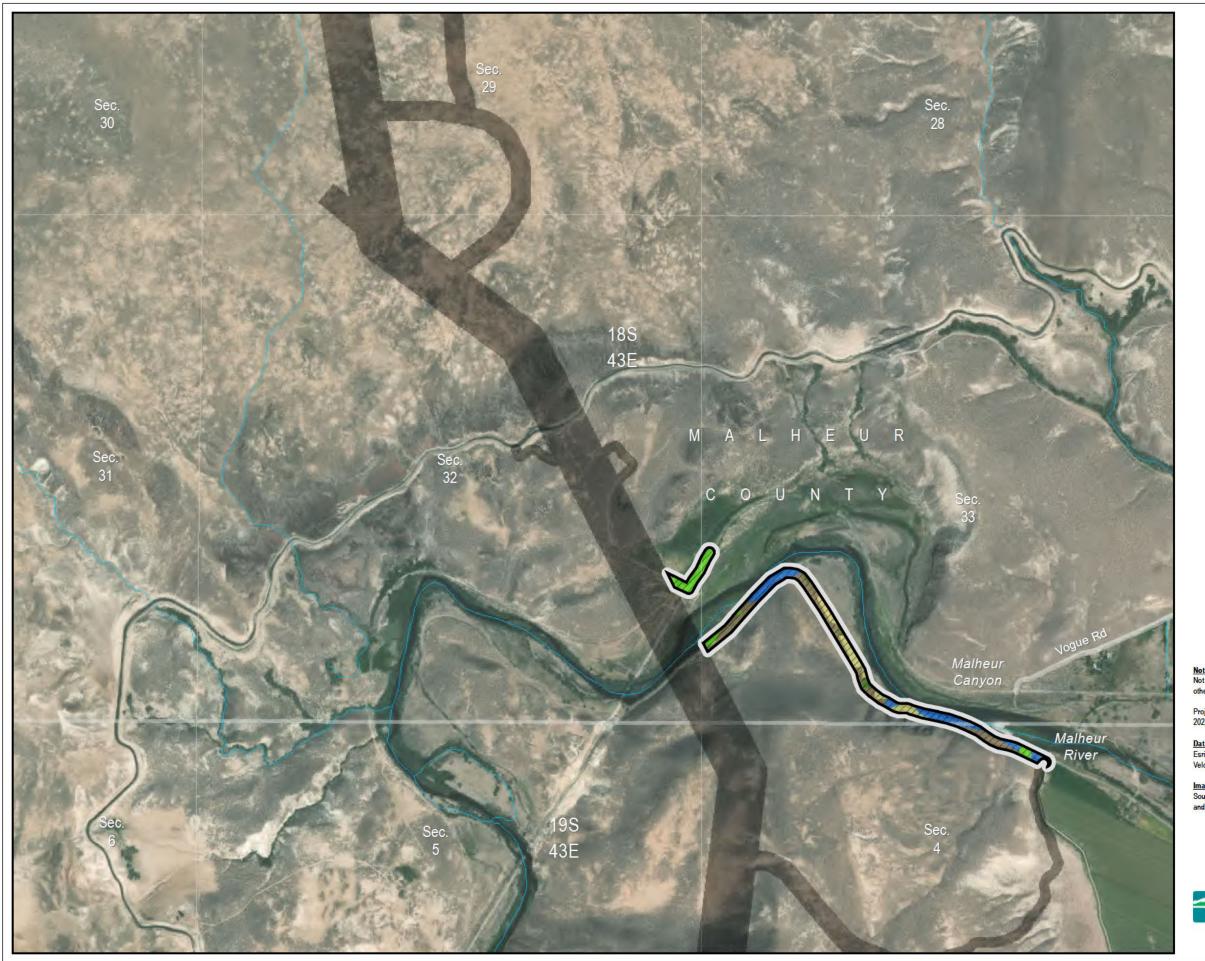
Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

### Imagery:









# Figure 7-8 Fish and Wildlife Habitat

Access Roads Malheur County

Map 33

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1, 2

General ∀egetation Type Within RFA1 Site Boundary

Agriculture/Developed Forest/Woodland Grassland

Riparian Vegetation Shrubland

Open Water

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Notes: Not intended for construction or any uses

Project features current as of October 28, 2022.

<u>Data Source(s)</u>: Esri, NRCS (STATSGO), ODOT, USGS,

Imagery:









# Figure 7-8 Fish and Wildlife Habitat

Access Roads Malheur County

Map 34

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1 2

General ∀egetation Type Within RFA1 Site Boundary

Bare Ground Grassland

Shrubland

Not intended for construction or any uses

Project features current as of October 28, 2022.

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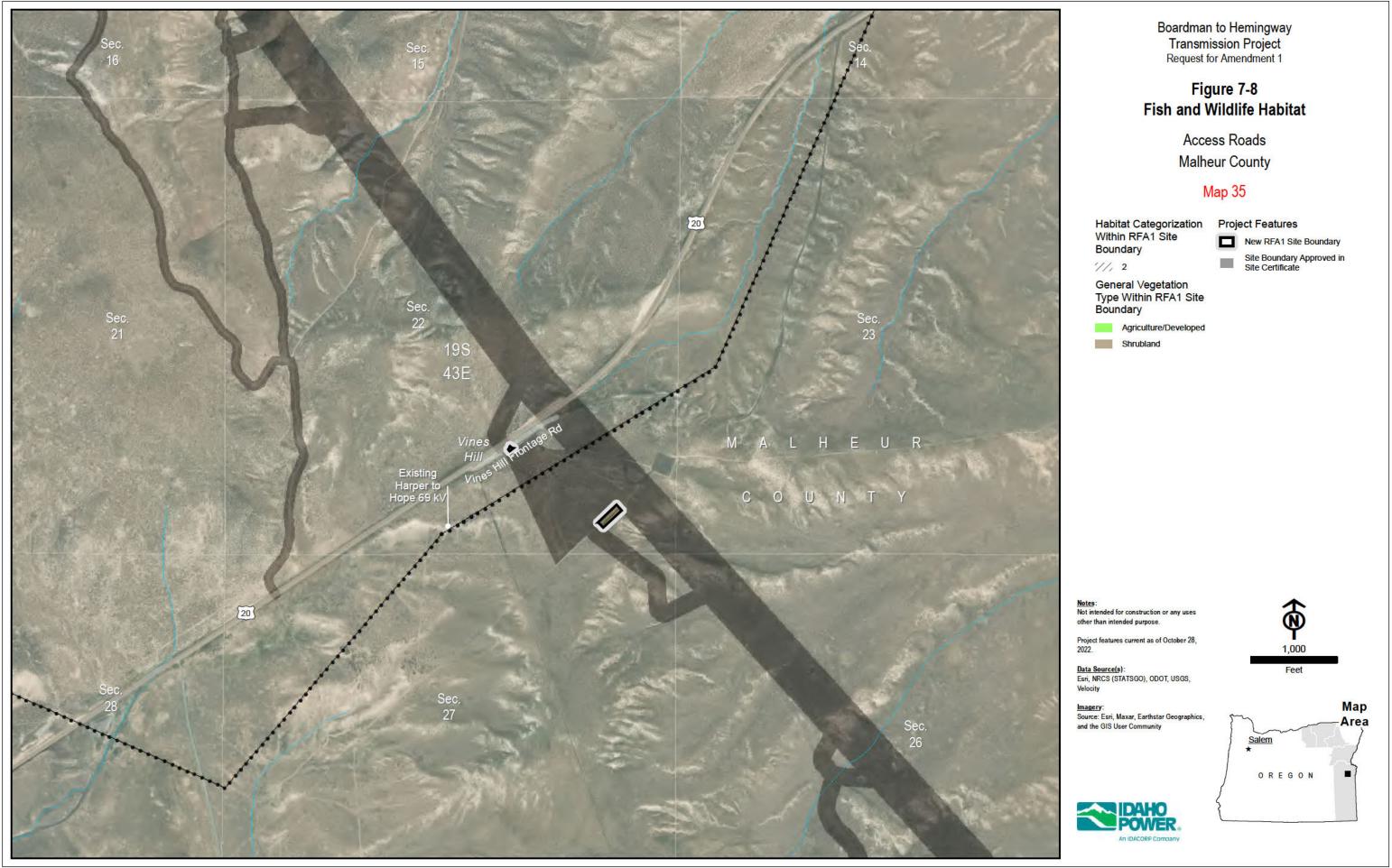
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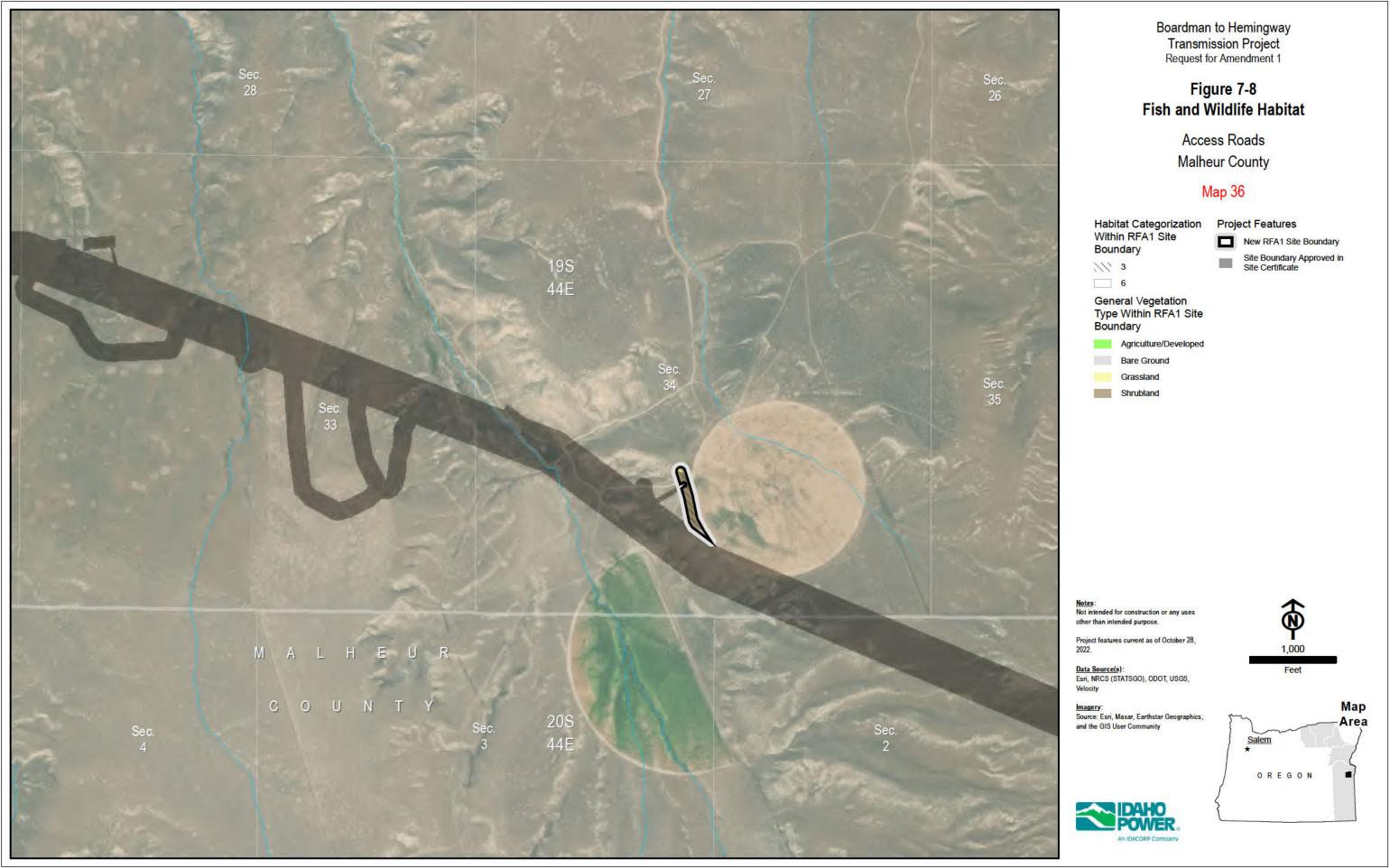
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Map Area OREGON









# Figure 7-8 Fish and Wildlife Habitat

Access Roads Malheur County

Map 37

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1 2

General Vegetation Type Within RFA1 Site Boundary

Grassland

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses

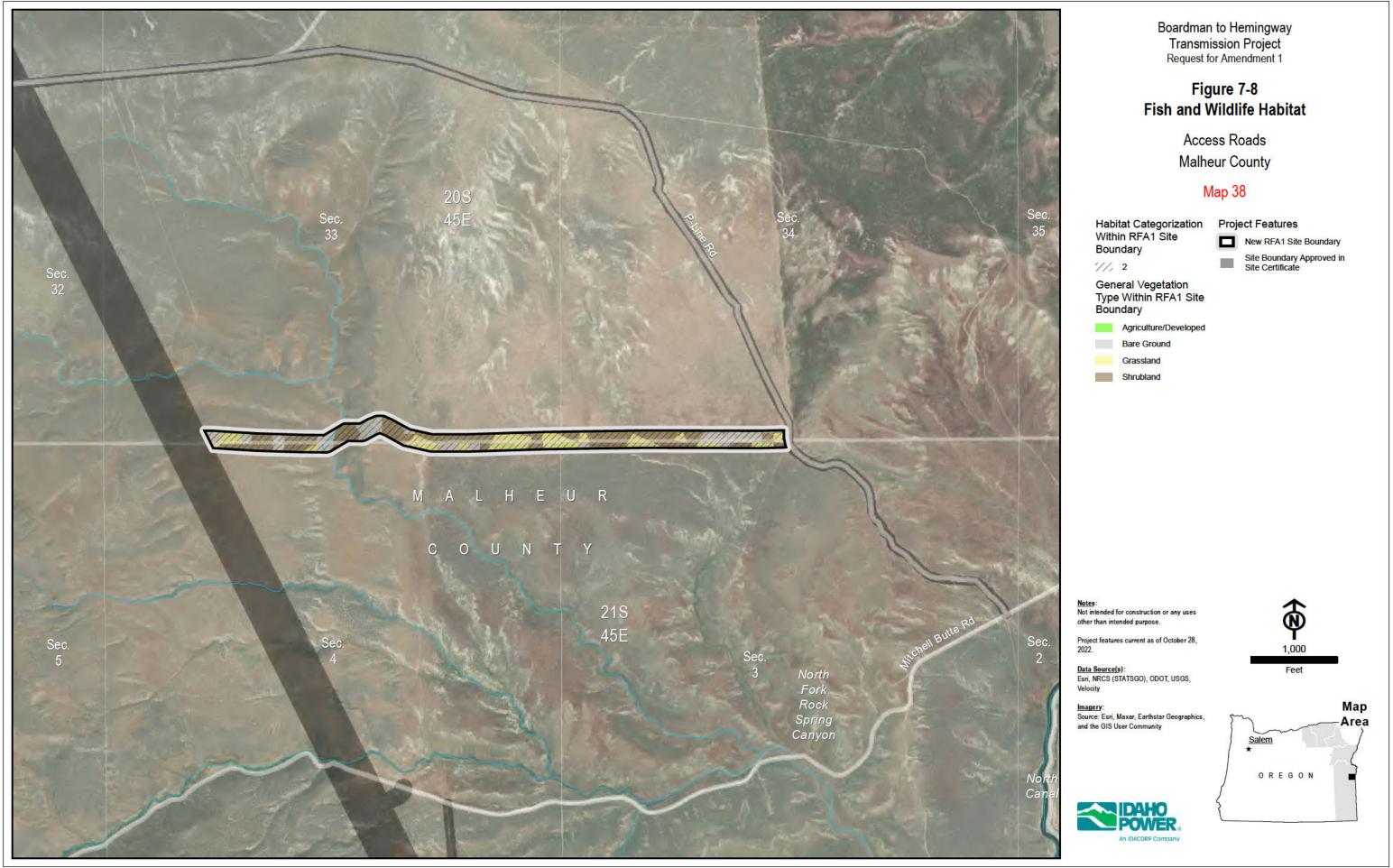
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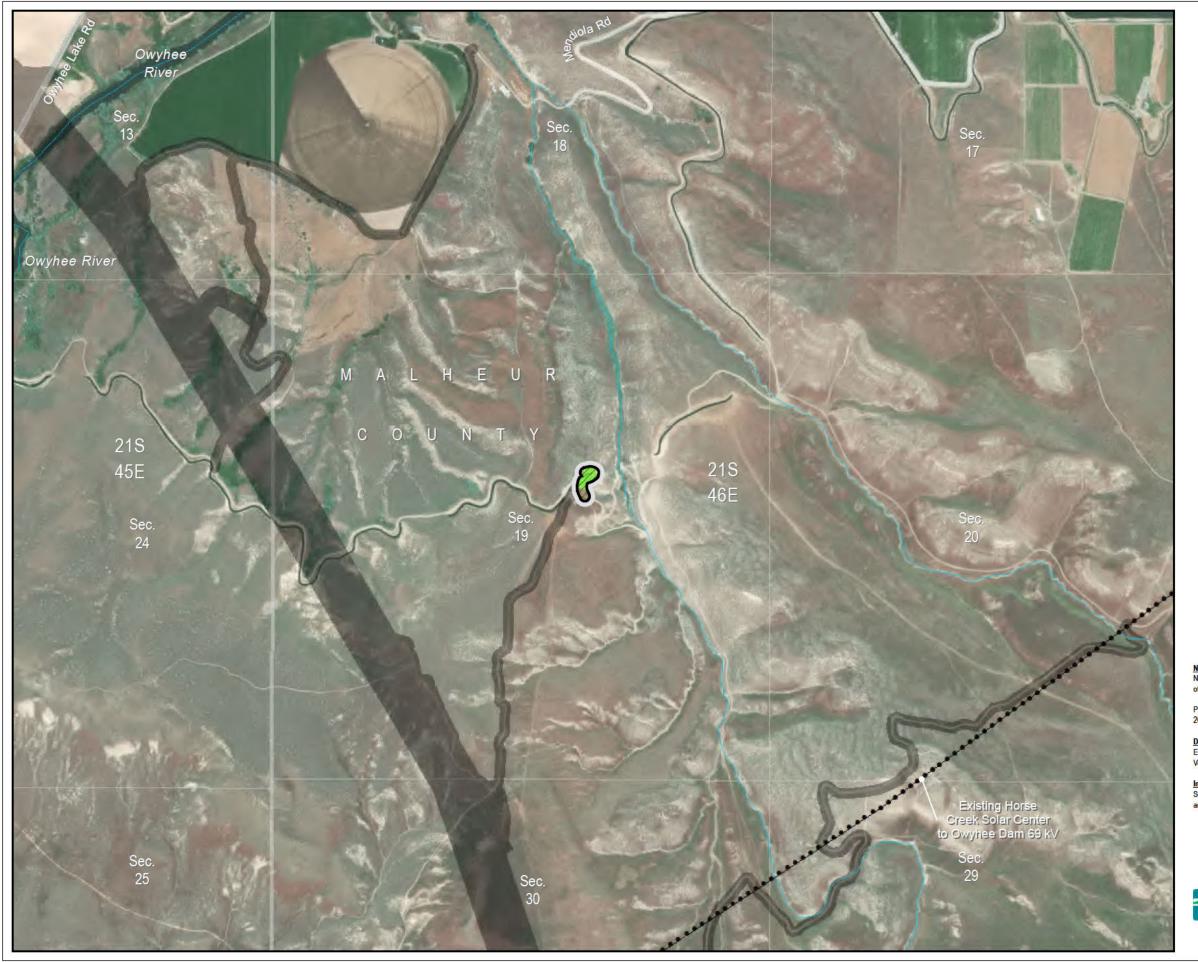
Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,











# Figure 7-8 Fish and Wildlife Habitat

Access Roads Malheur County

Map 39

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1, 2

General Vegetation Type Within RFA1 Site Boundary

Agriculture/Developed Grassland

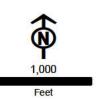
Shrubland

Not intended for construction or any uses

Project features current as of October 28, 2022.

Data Source(s): Esri, NRCS (STATSGO), ODOT, USGS,

### Imagery:









# Figure 7-8 Fish and Wildlife Habitat

Access Roads Malheur County

Map 40

Habitat Categorization Project Features Within RFA1 Site Boundary

1/1, 2

General Vegetation Type Within RFA1 Site Boundary

Agriculture/Developed Forest/Woodland

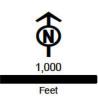
Grassland Shrubland

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

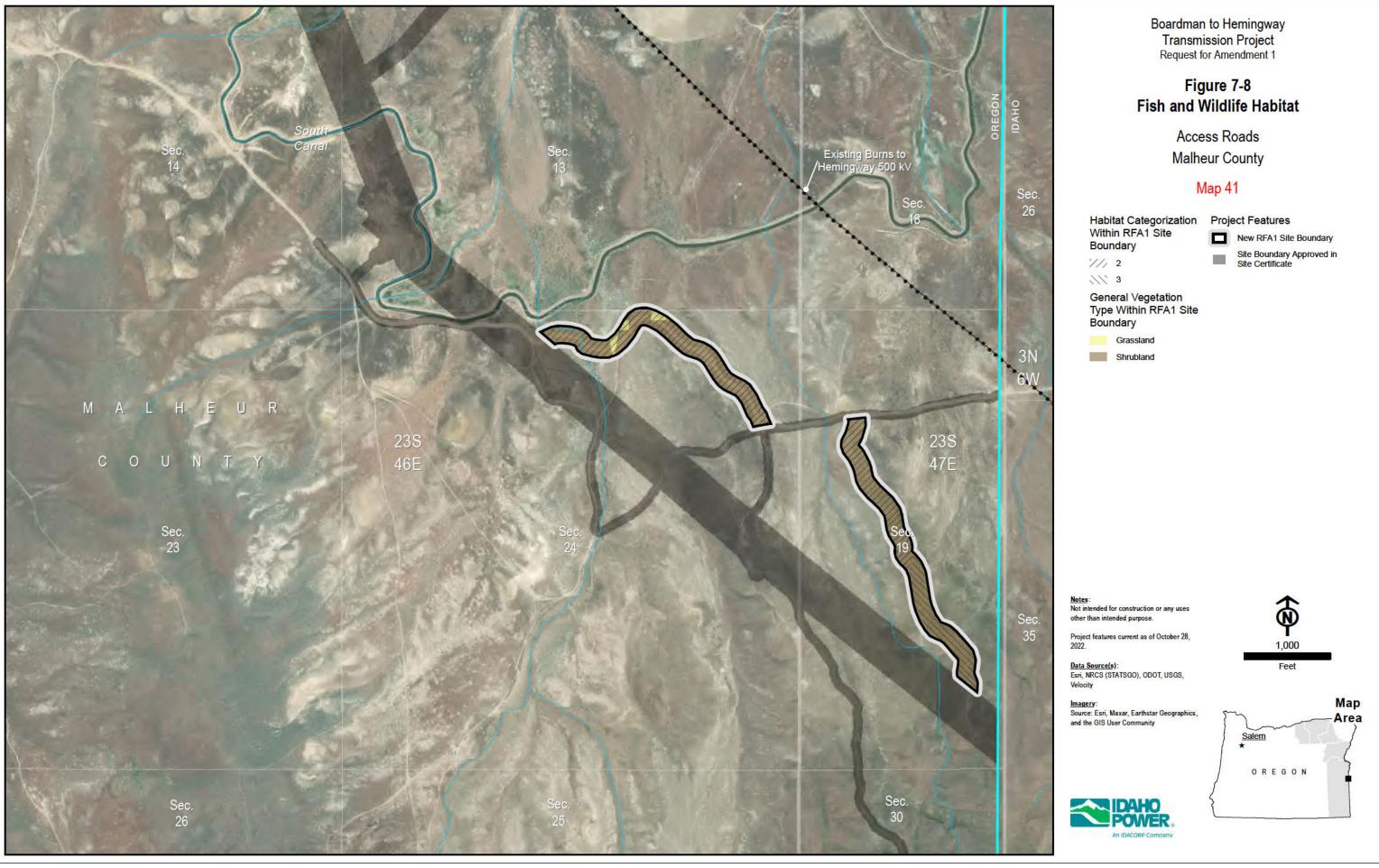
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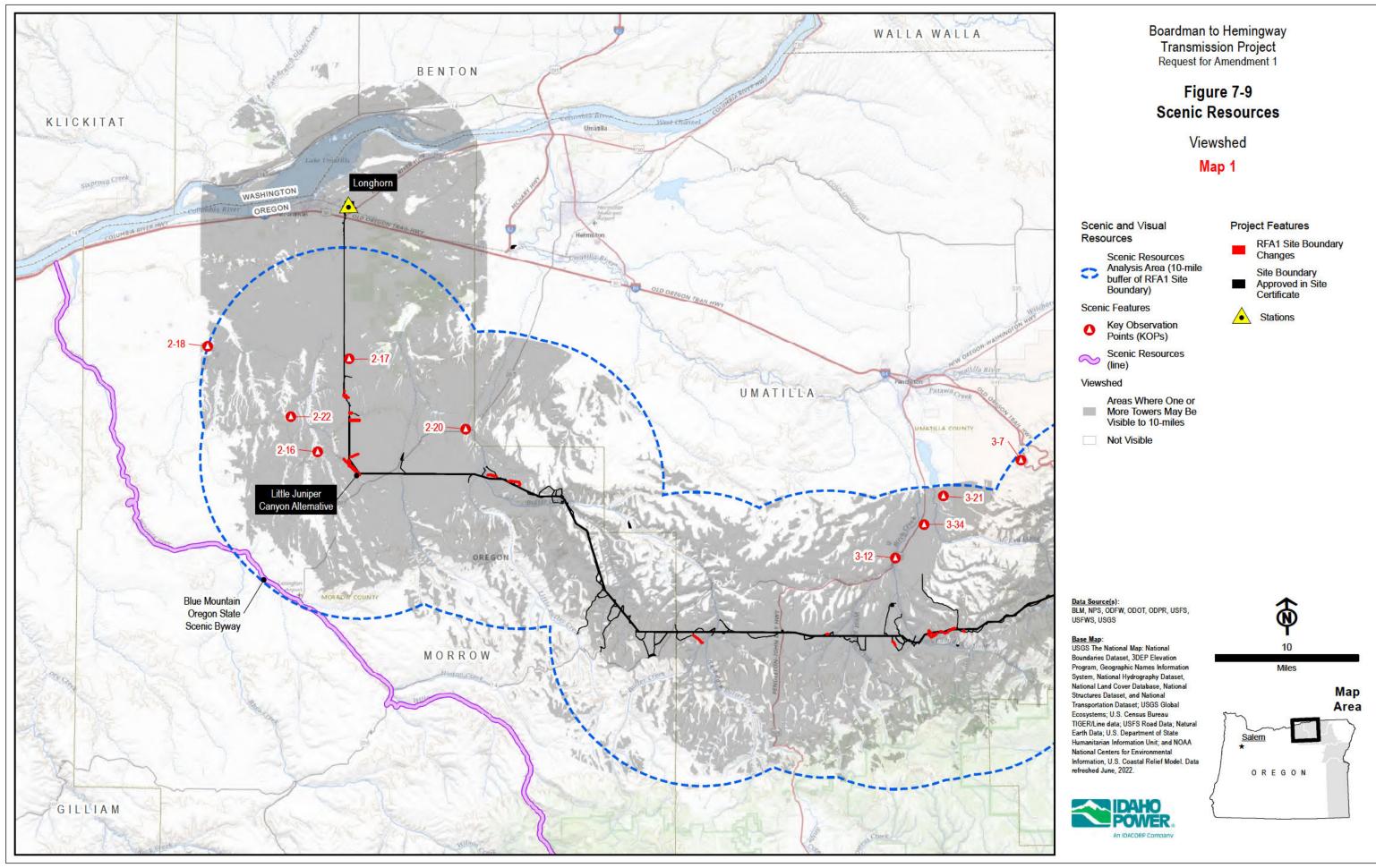
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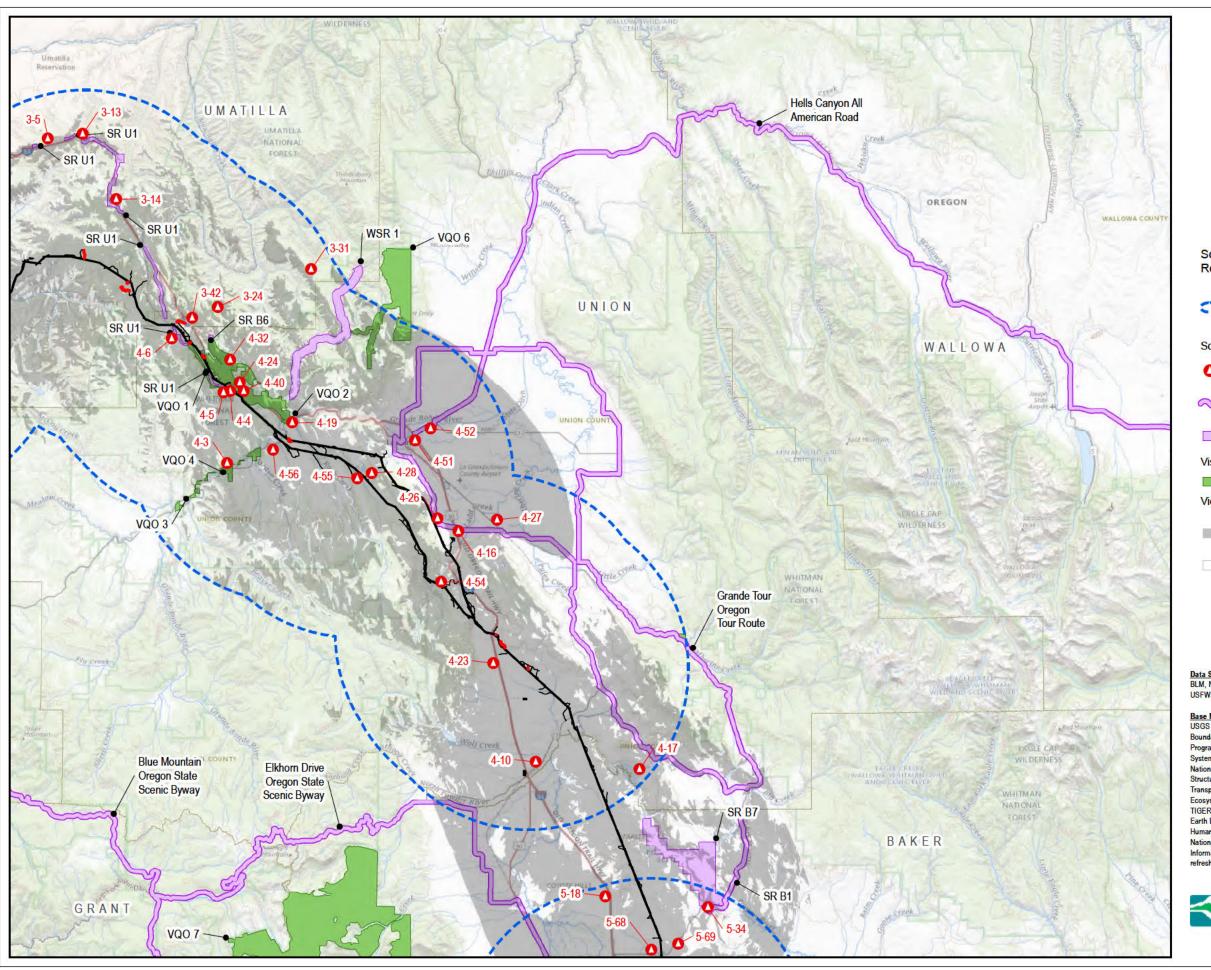












## Figure 7-9 **Scenic Resources**

Viewshed

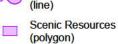
Map 2

## Scenic and Visual Resources

Scenic Resources Analysis Area (10-mile buffer of RFA1 Site Boundary)

Scenic Features

**Key Observation** Points (KOPs)



Visual Management Areas

USFS VQO Retention

Scenic Resources

Viewshed

Areas Where One or More Towers May Be Visible to 10-miles

Not Visible

**Project Features** 

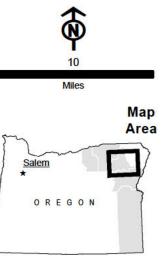
RFA1 Site Boundary Changes

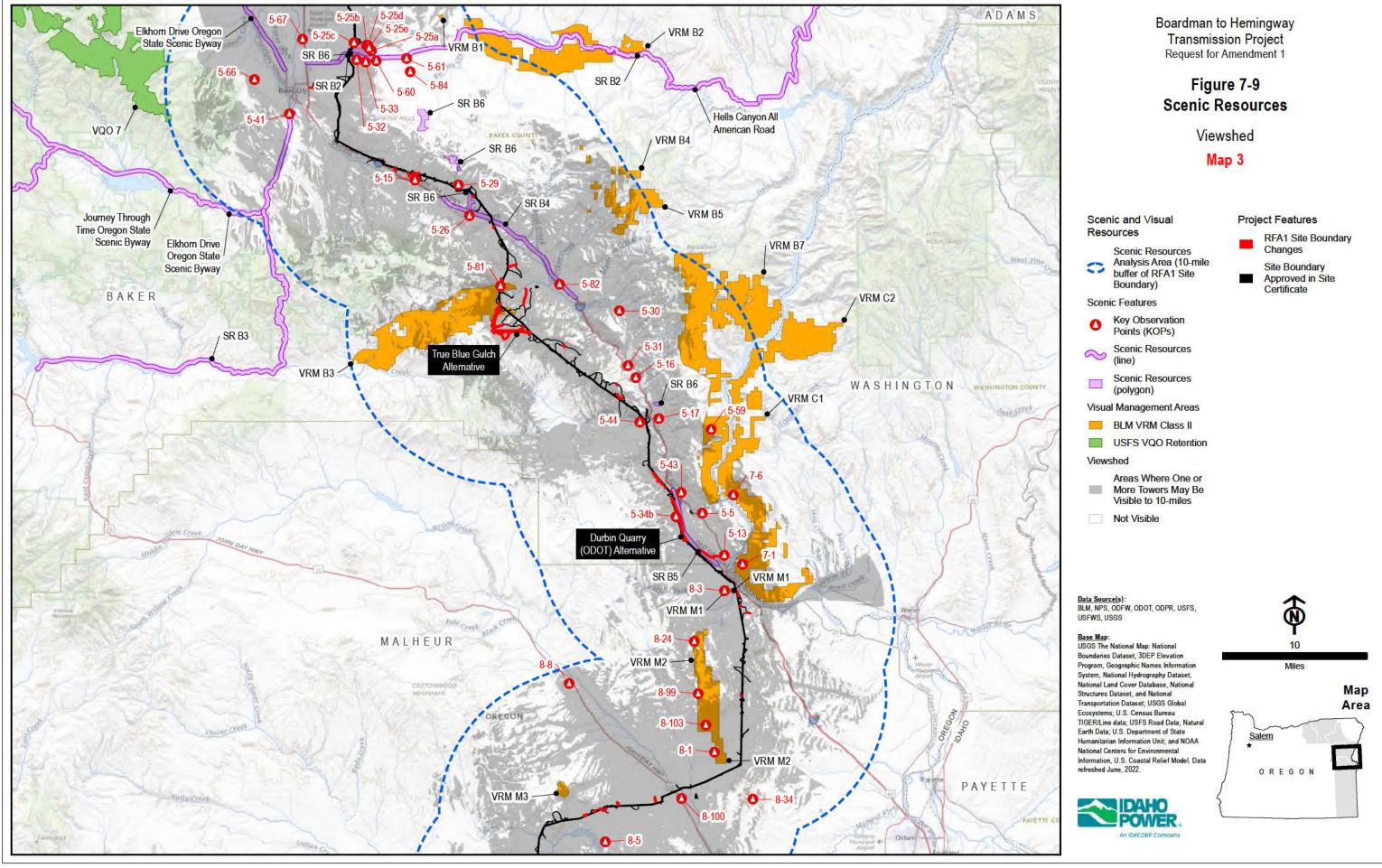
Site Boundary Approved in Site Certificate

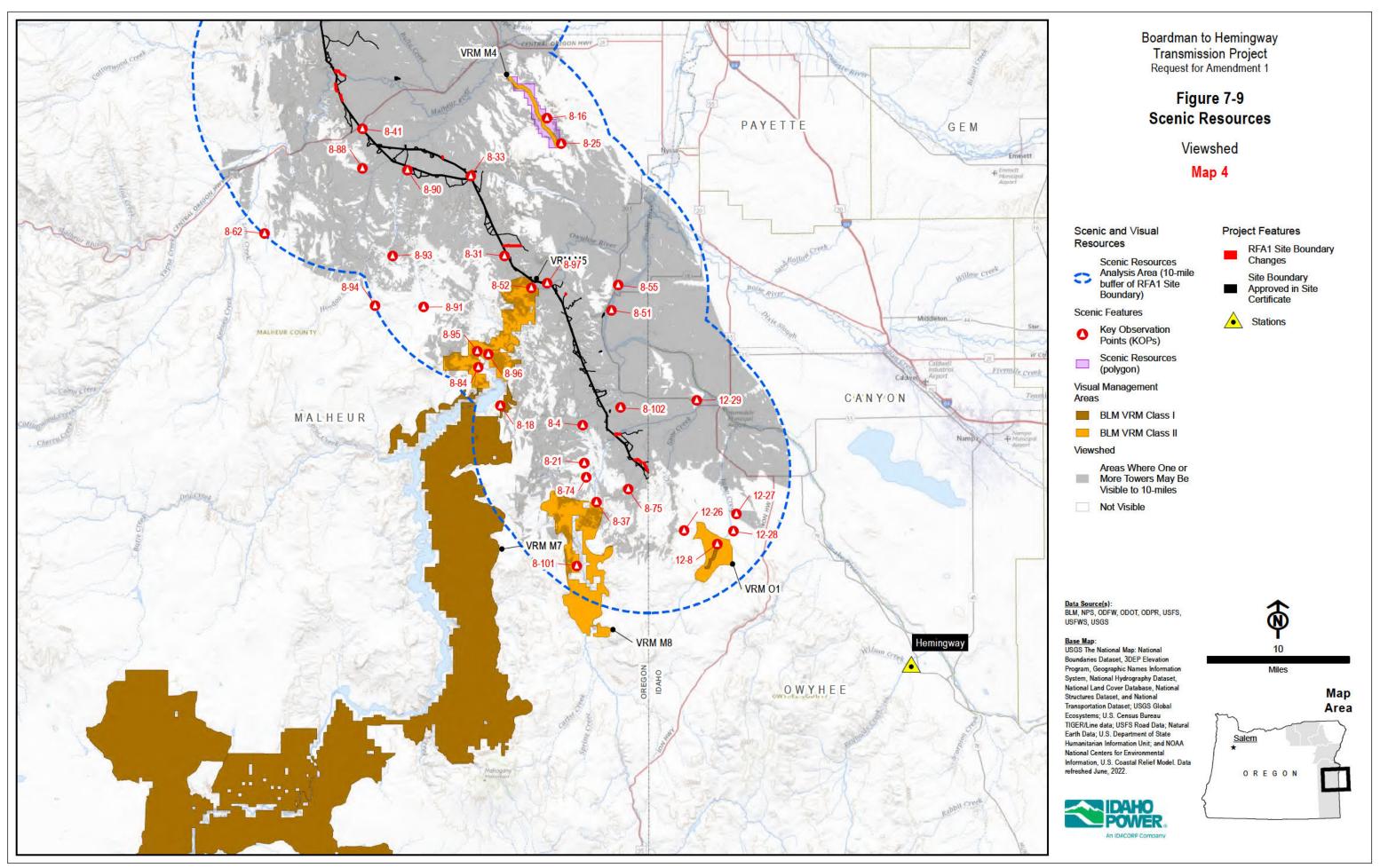
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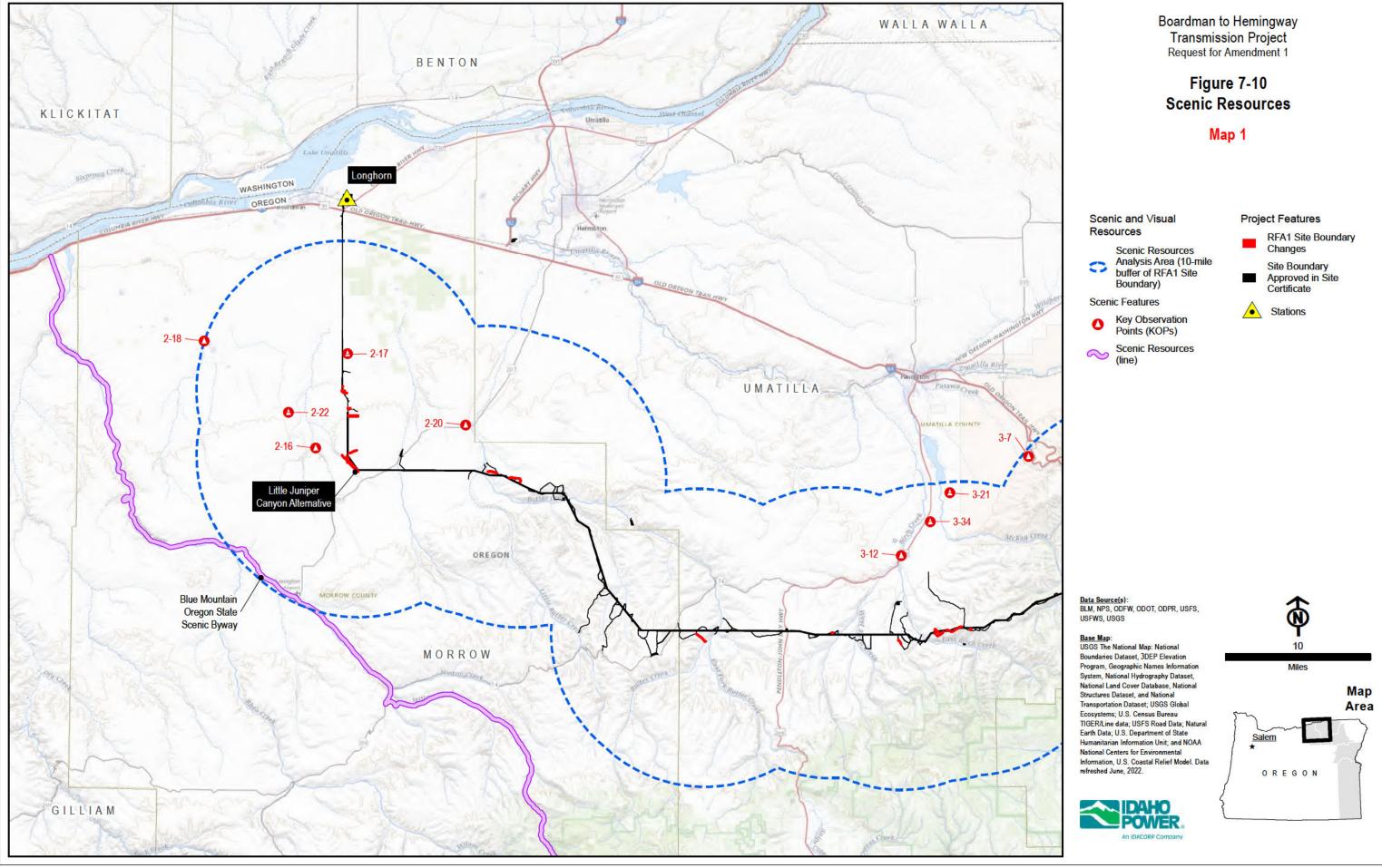
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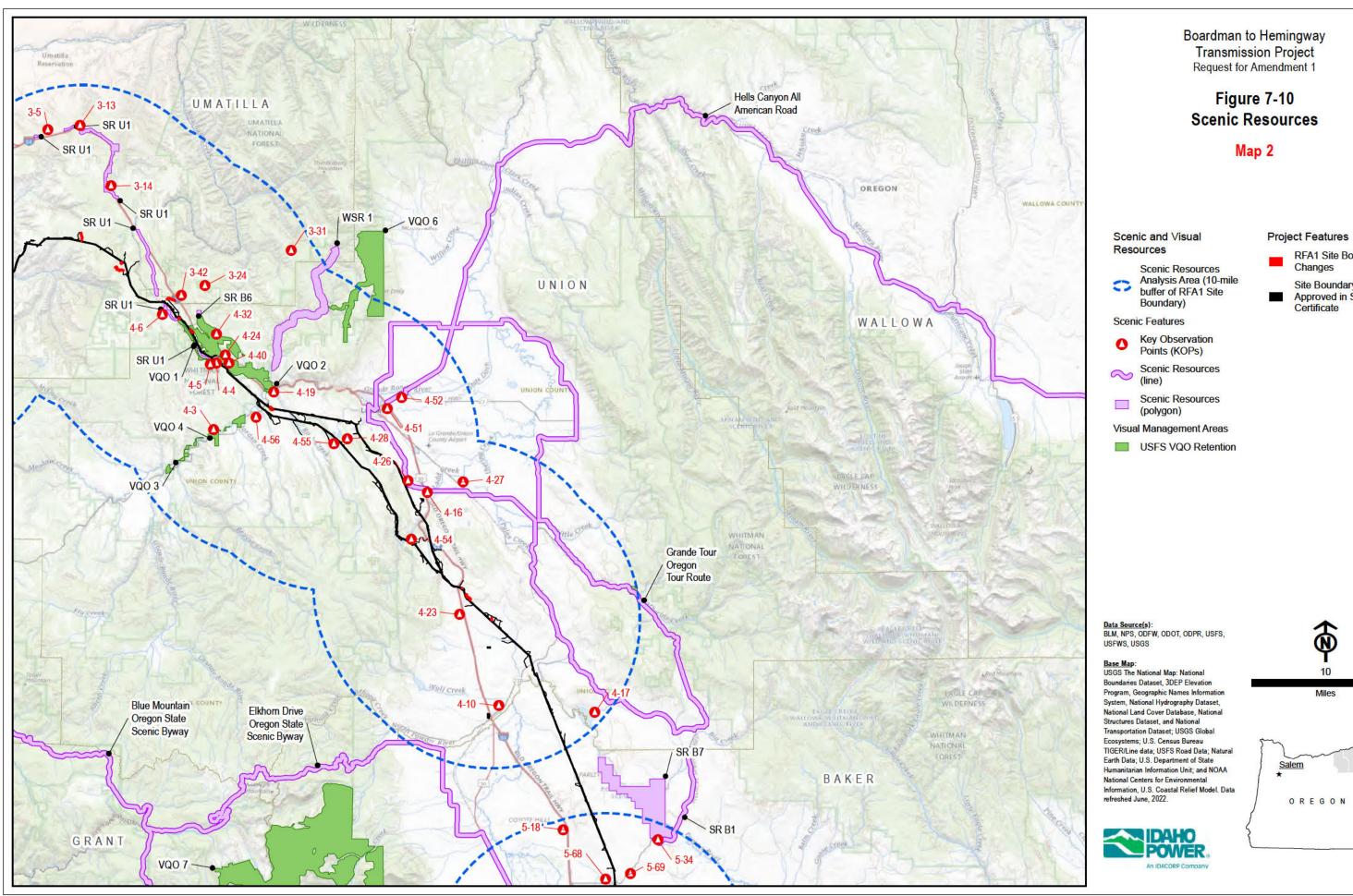












RFA1 Site Boundary

Changes

Site Boundary Approved in Site Certificate

10

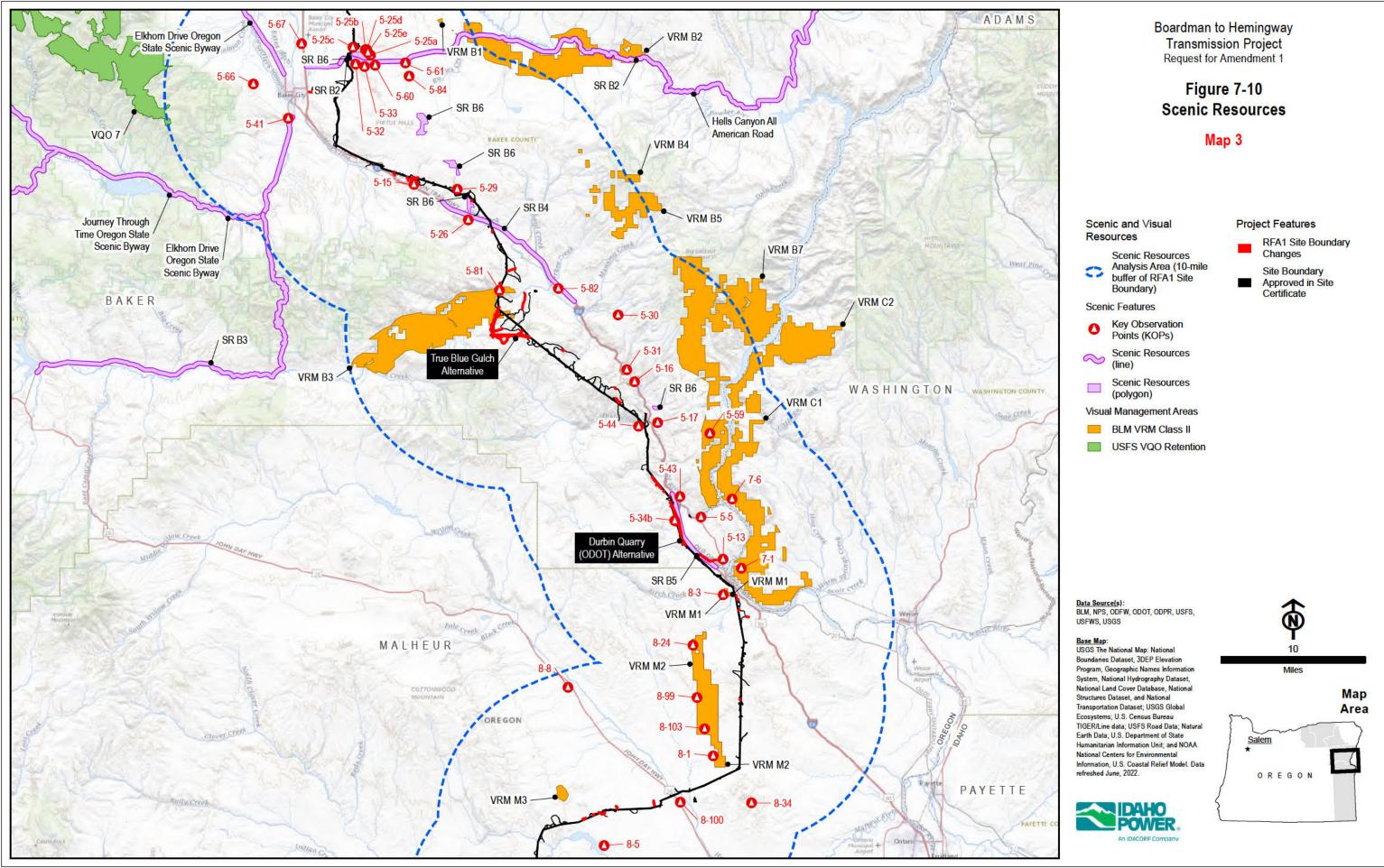
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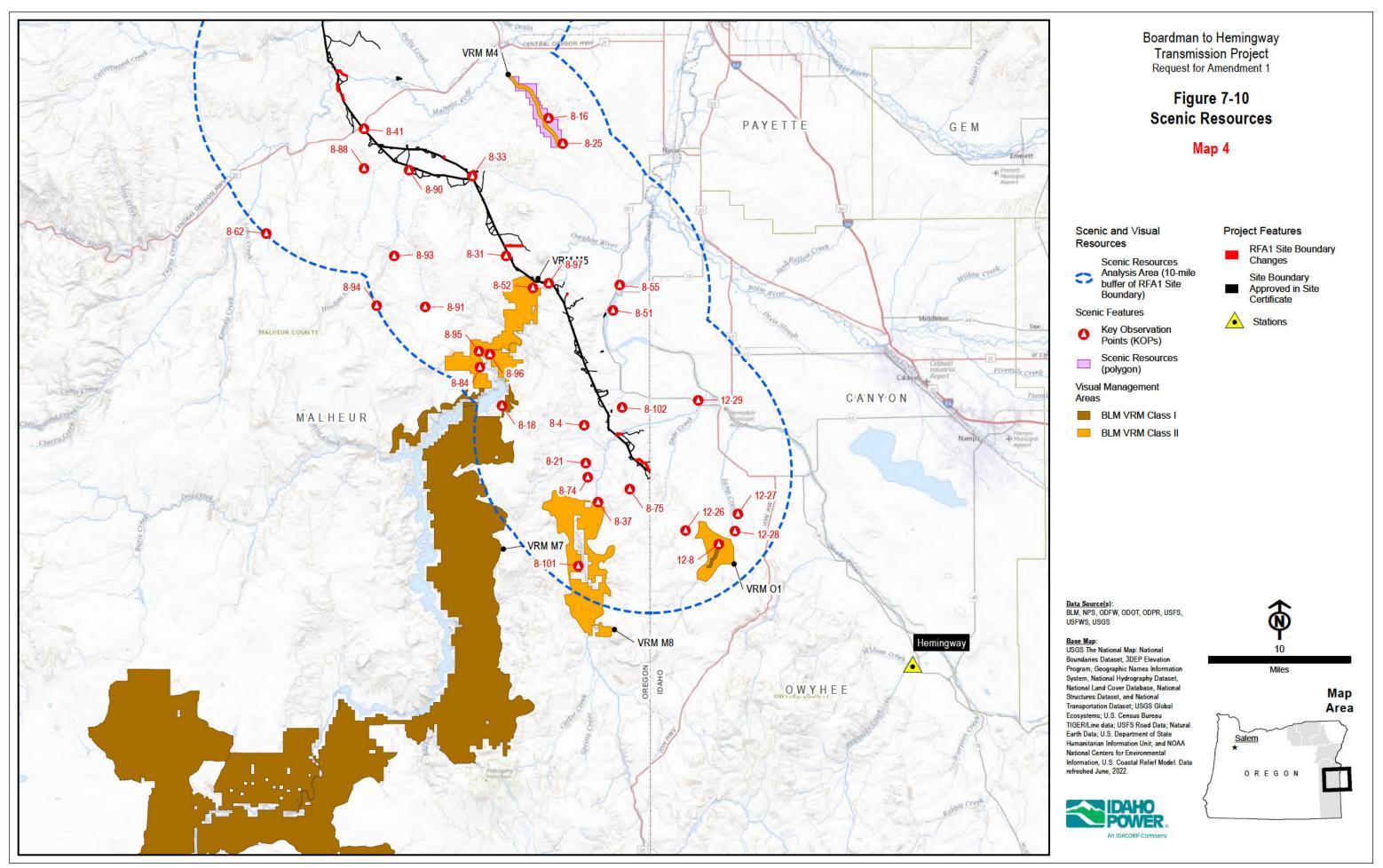
OREGON

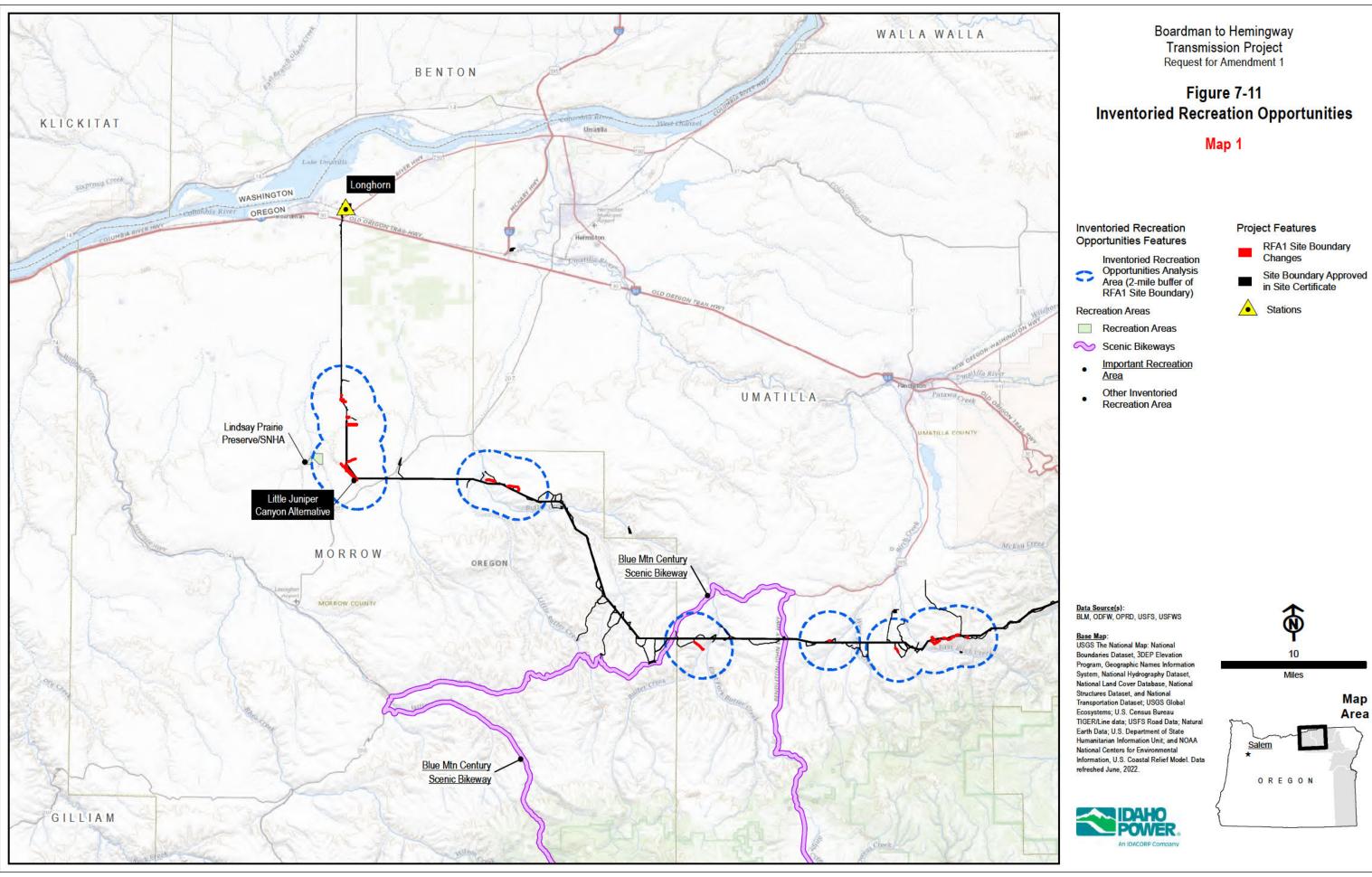
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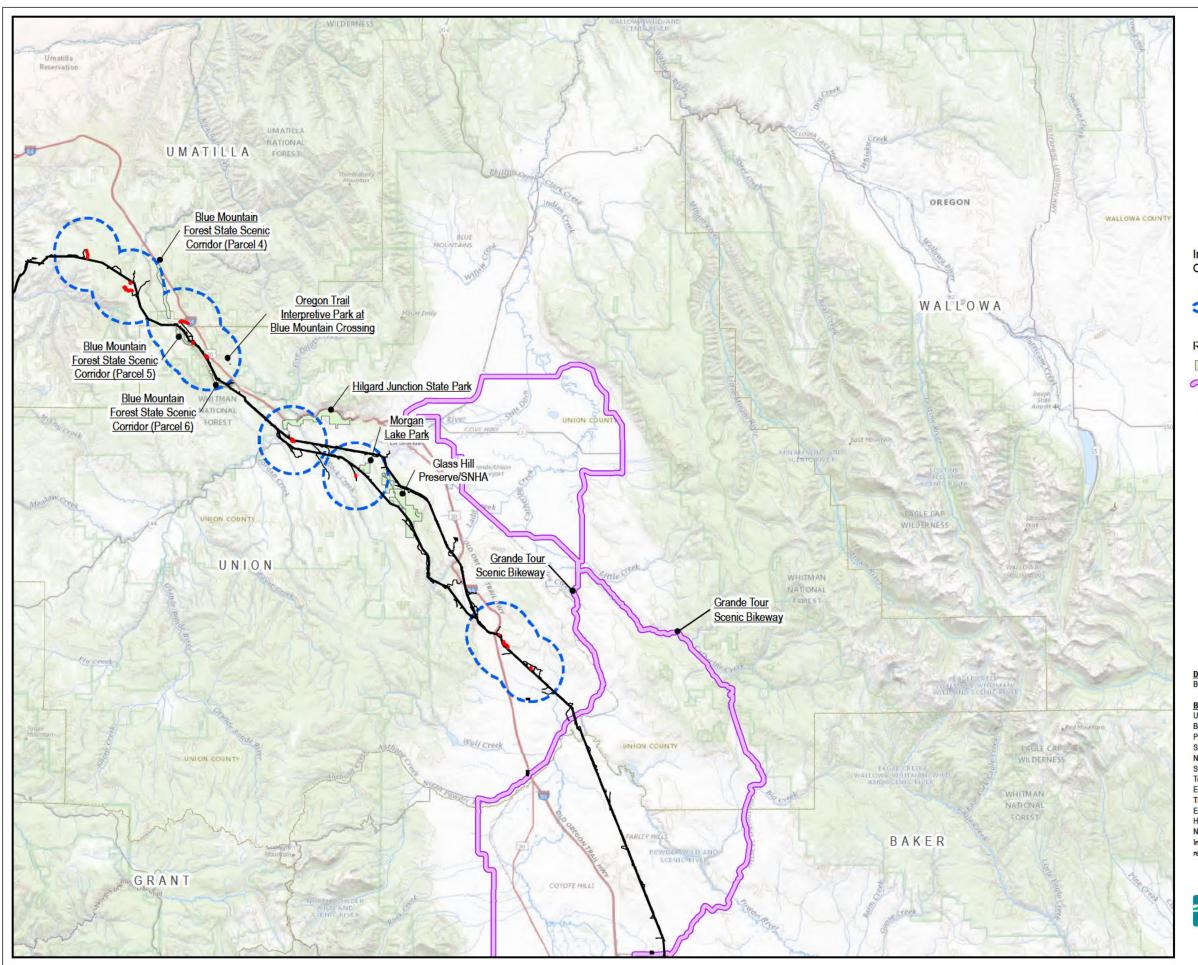
Map

Area









# Figure 7-11 **Inventoried Recreation Opportunities**

Map 2

## Inventoried Recreation Opportunities Features

Inventoried Recreation Opportunities Analysis
Area (2-mile buffer of RFA1 Site Boundary)

### Recreation Areas

Recreation Areas



- Important Recreation Area
- Other Inventoried Recreation Area

## **Project Features**

RFA1 Site Boundary Changes

Site Boundary Approved in Site Certificate



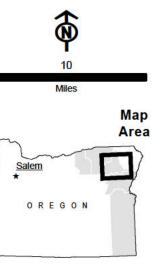
Stations

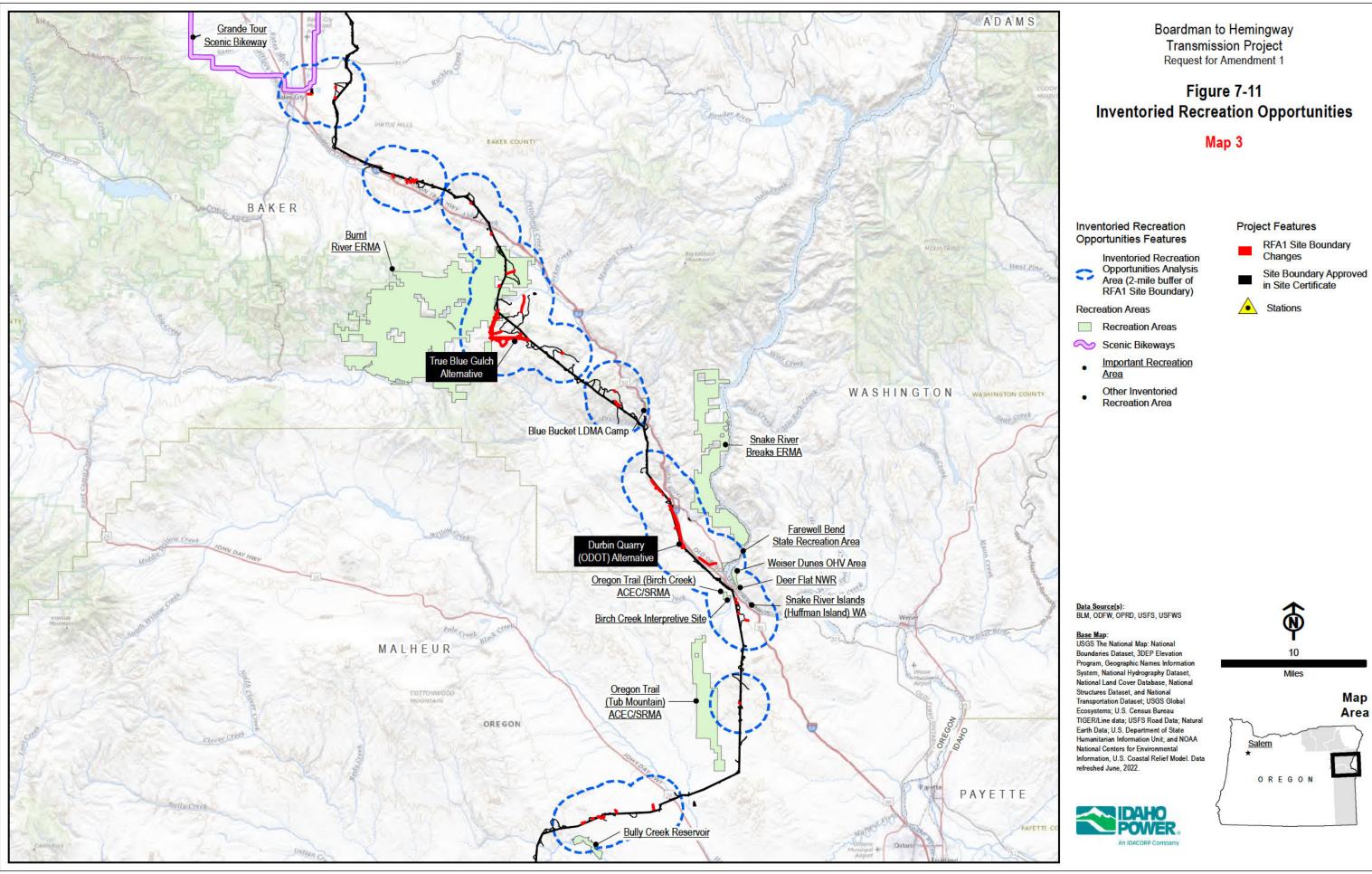
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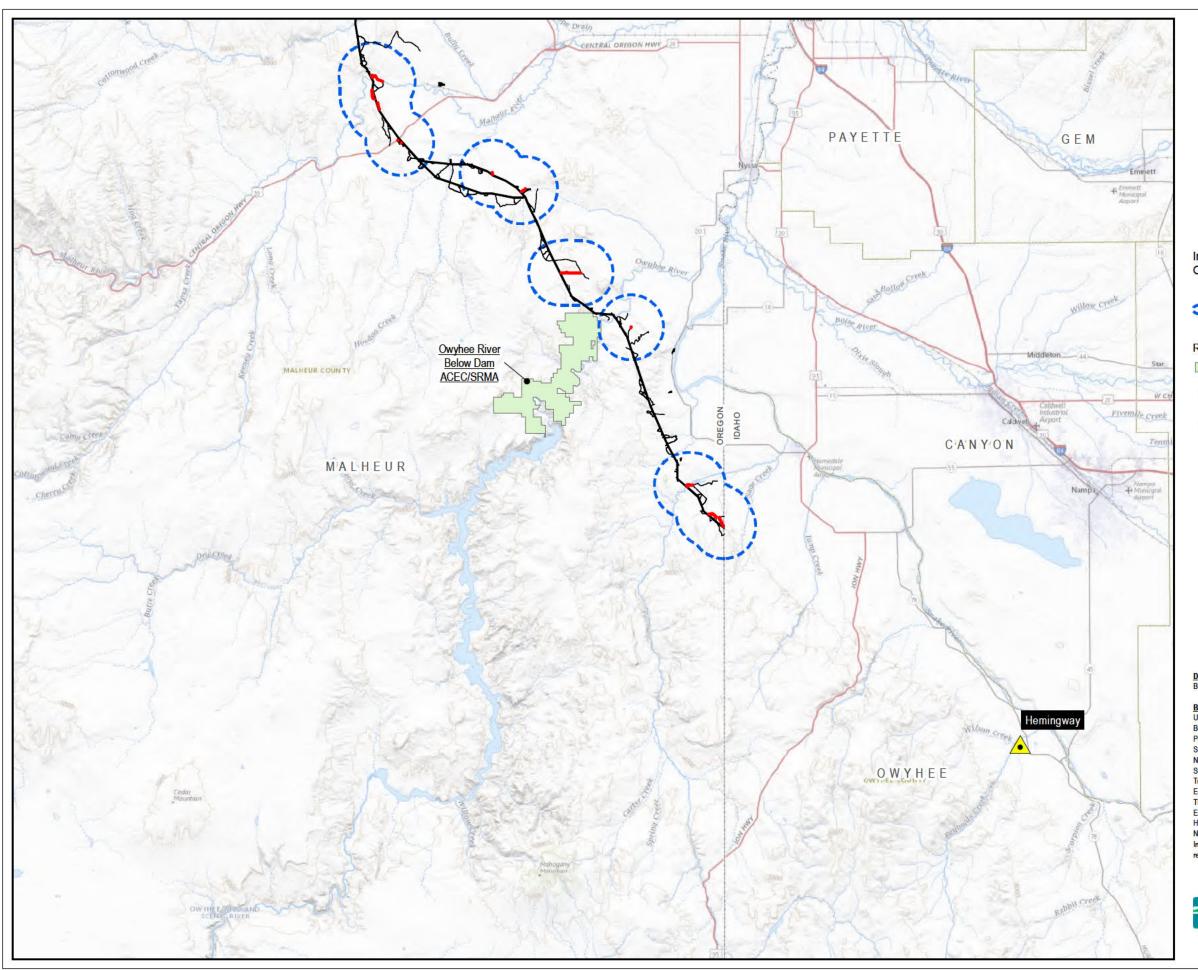
## Base Map:

USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road Data; Natural Earth Data; U.S. Department of State Humanitarian Information Unit; and NOAA National Centers for Environmental Information, U.S. Coastal Relief Model. Data refreshed June, 2022.









### Figure 7-11 **Inventoried Recreation Opportunities**

Map 4

### Inventoried Recreation Opportunities Features

Inventoried Recreation
Opportunities Analysis
Area (2-mile buffer of
RFA1 Site Boundary)

#### Recreation Areas

- Recreation Areas
- Important Recreation
- Other Inventoried Recreation Area

### **Project Features**

- **RFA1 Site Boundary** Changes
- Site Boundary Approved in Site Certificate

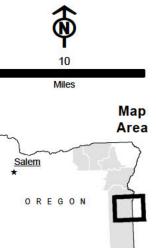


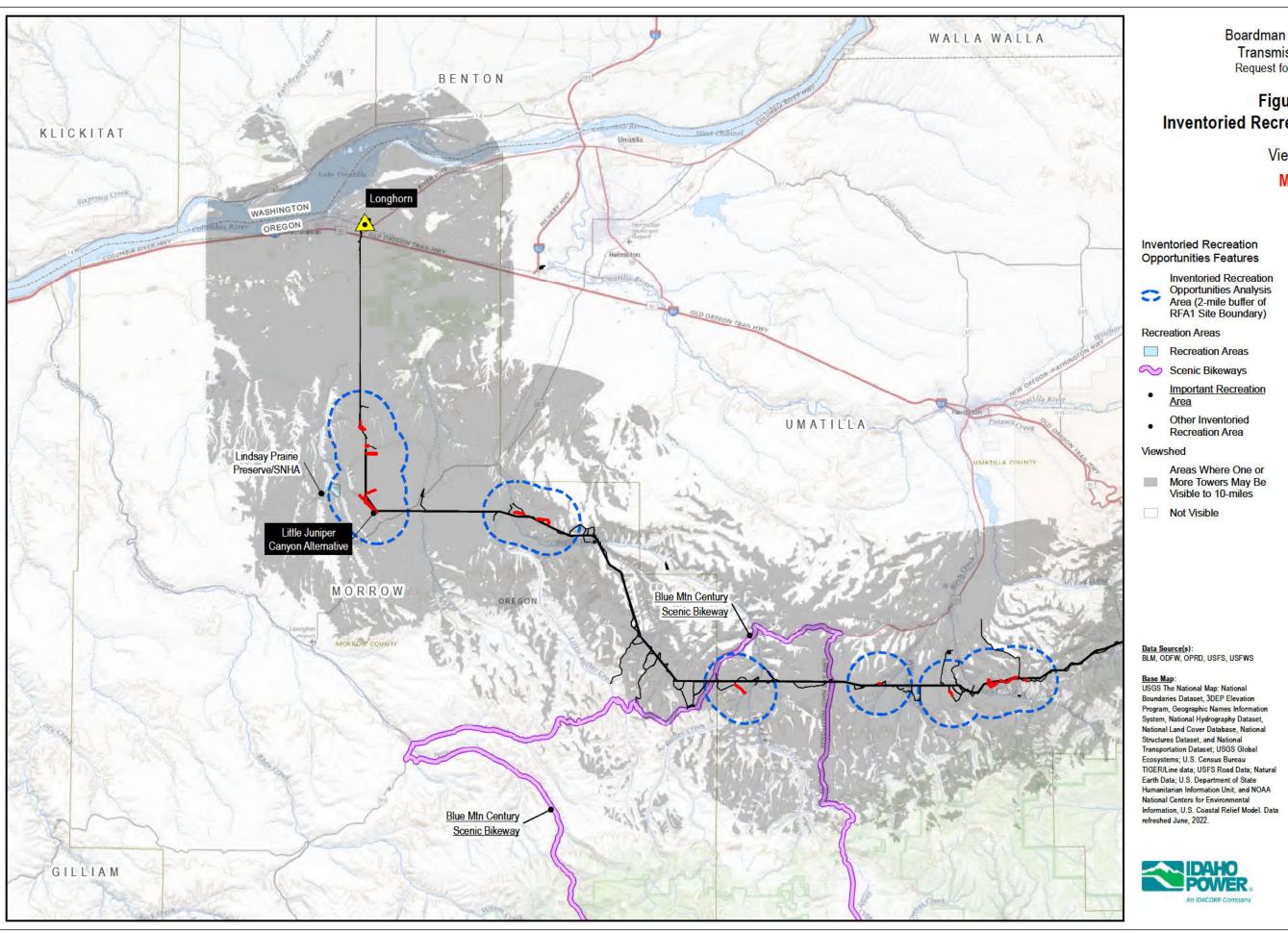
Stations

# Data Source(s): BLM, ODFW, OPRD, USFS, USFWS

#### Base Map: USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road Data; Natural Earth Data; U.S. Department of State Humanitarian Information Unit; and NOAA National Centers for Environmental Information, U.S. Coastal Relief Model. Data refreshed June, 2022.







### Figure 7-12 **Inventoried Recreation Opportunities**

Viewshed

Map 1

#### **Project Features**

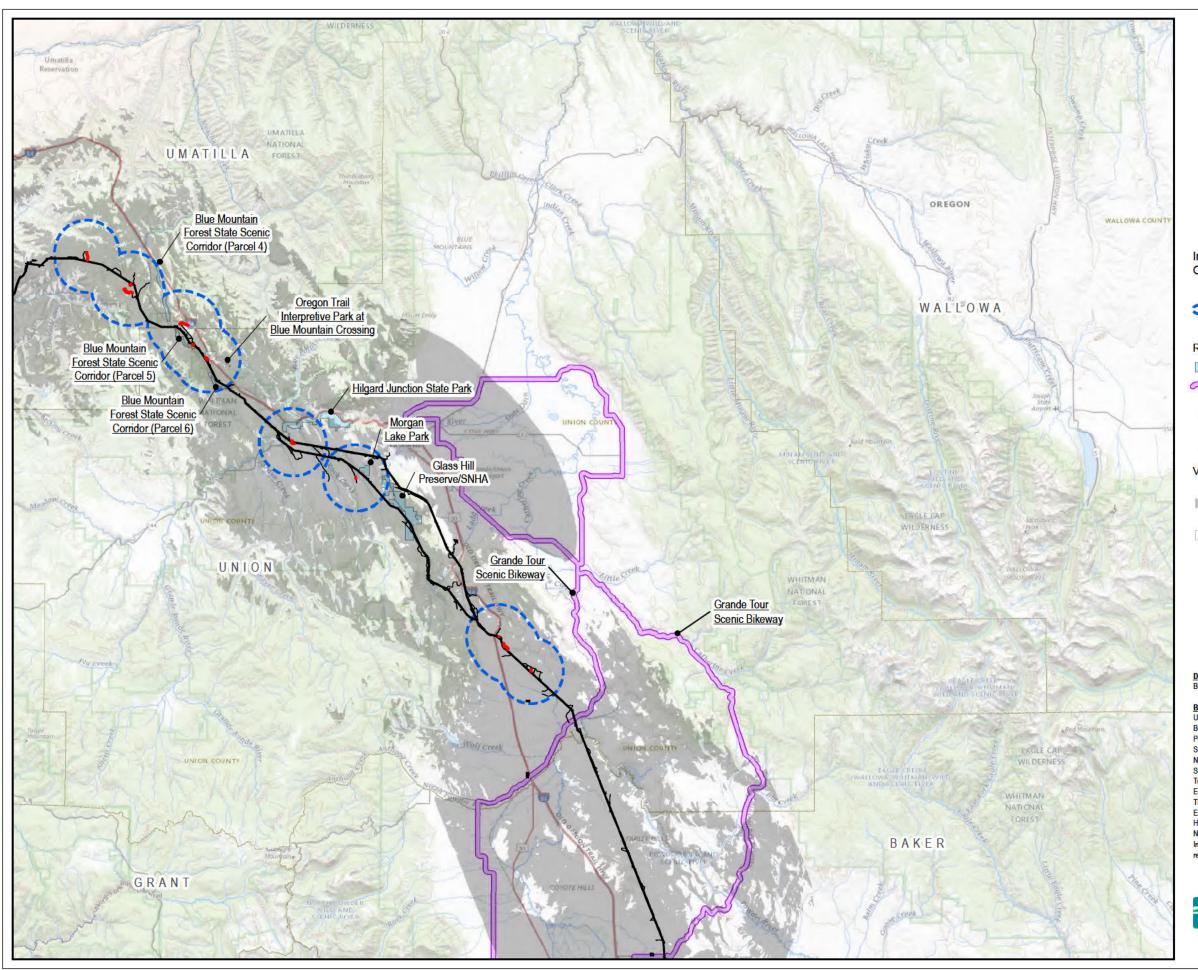
- RFA1 Site Boundary Changes
- Site Boundary Approved in Site Certificate



Stations







### Figure 7-12 **Inventoried Recreation Opportunities**

Viewshed

Map 2

### Inventoried Recreation Opportunities Features

Inventoried Recreation Opportunities Analysis
Area (2-mile buffer of RFA1 Site Boundary)

#### Recreation Areas

Recreation Areas



- Important Recreation Area
- Other Inventoried Recreation Area

Areas Where One or More Towers May Be Visible to 10-miles

Not Visible

#### **Project Features**

RFA1 Site Boundary Changes

Site Boundary Approved in Site Certificate

Stations

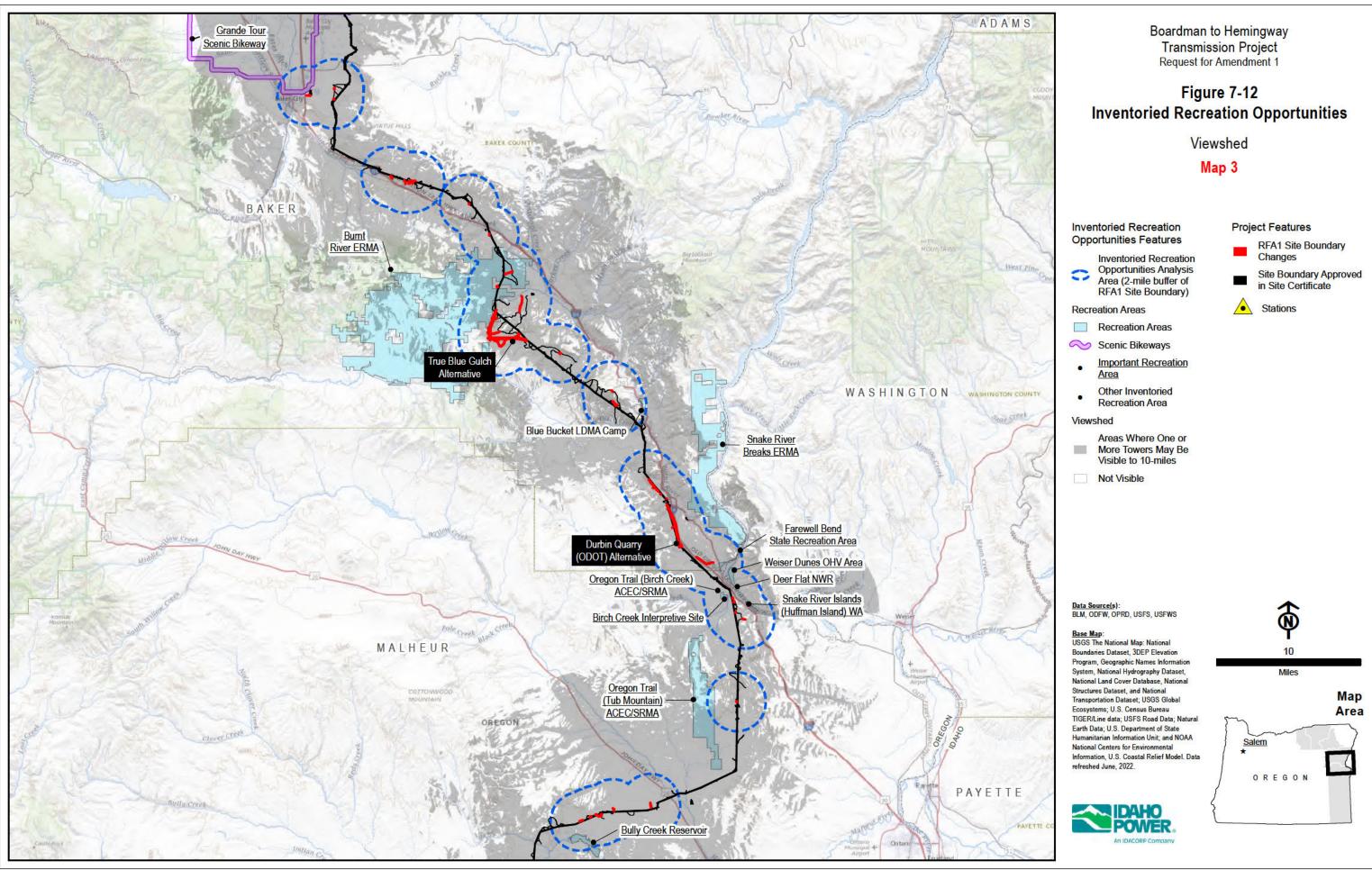
Data Source(s):
BLM, ODFW, OPRD, USFS, USFWS

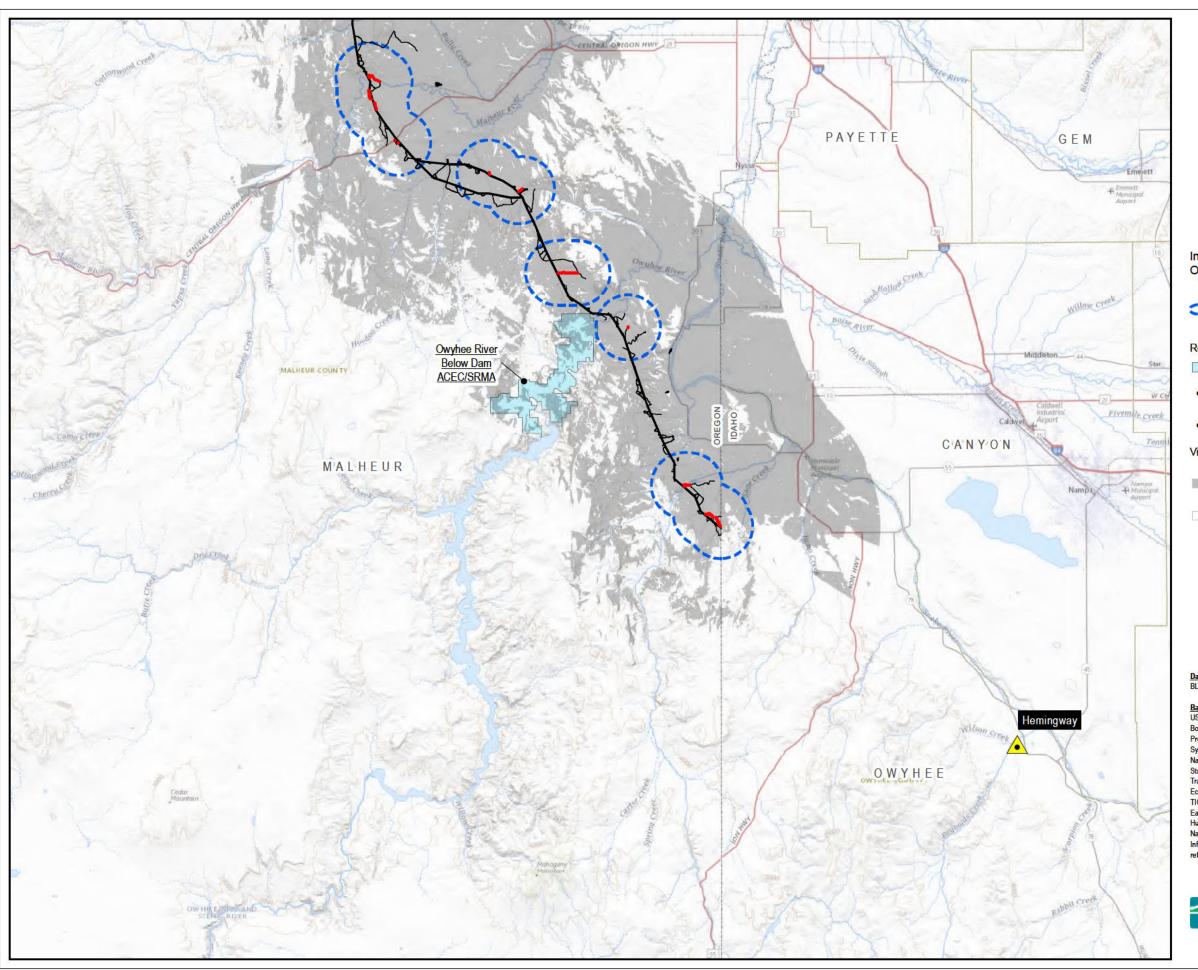
### Base Map:

USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road Data; Natural Earth Data; U.S. Department of State Humanitarian Information Unit; and NOAA National Centers for Environmental Information, U.S. Coastal Relief Model. Data refreshed June, 2022.









### Figure 7-12 **Inventoried Recreation Opportunities**

Viewshed

Map 4

### Inventoried Recreation Opportunities Features

Inventoried Recreation
Opportunities Analysis
Area (2-mile buffer of
RFA1 Site Boundary)

#### Recreation Areas

- Recreation Areas
- Important Recreation
- Other Inventoried Recreation Area

#### Viewshed

- Areas Where One or More Towers May Be Visible to 10-miles
- Not Visible

### **Project Features**

- RFA1 Site Boundary Changes
- Site Boundary Approved in Site Certificate



Stations

# Data Source(s): BLM, ODFW, OPRD, USFS, USFWS

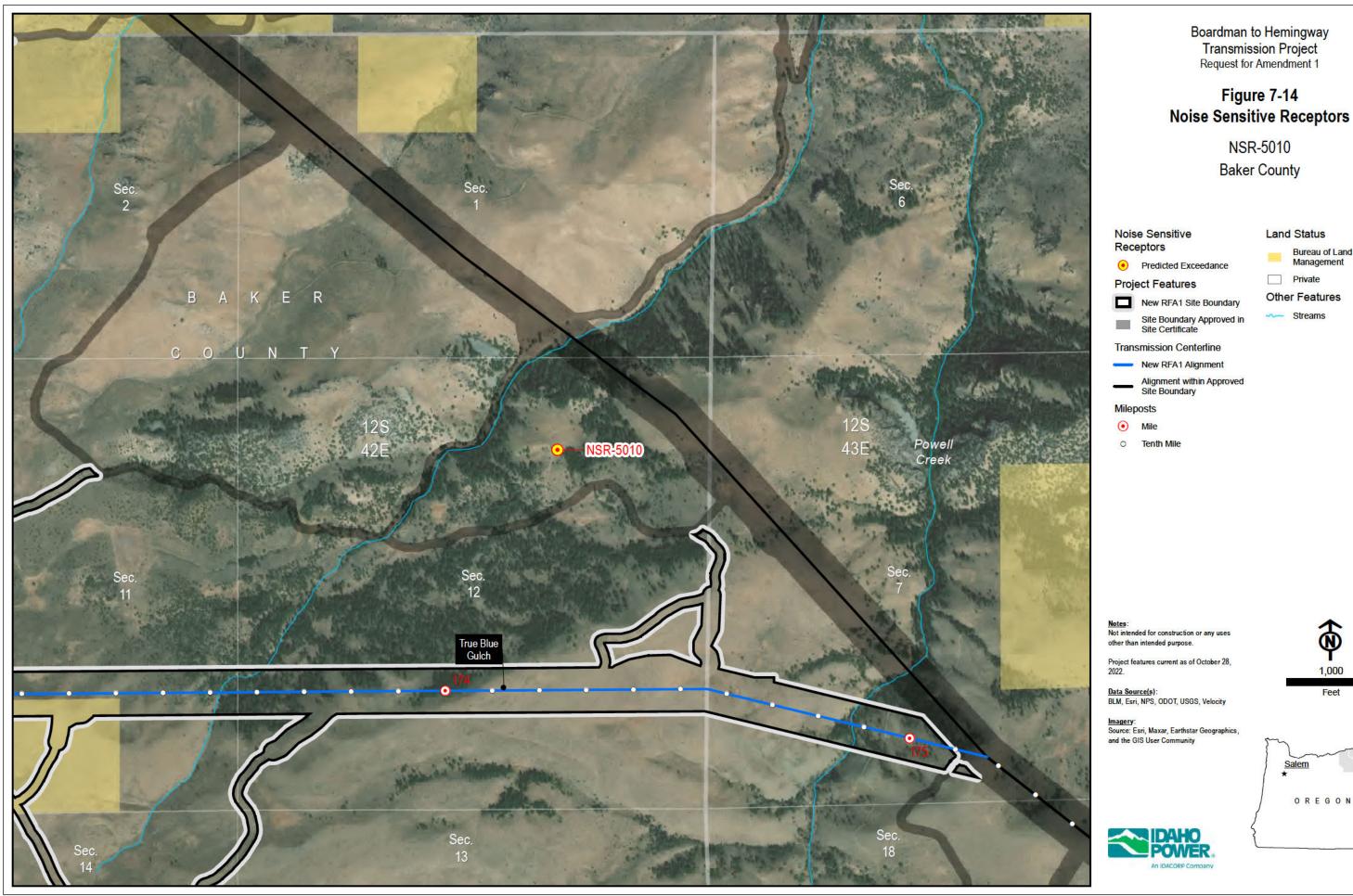
Base Map: USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road Data; Natural Earth Data; U.S. Department of State Humanitarian Information Unit; and NOAA National Centers for Environmental Information, U.S. Coastal Relief Model. Data refreshed June, 2022.









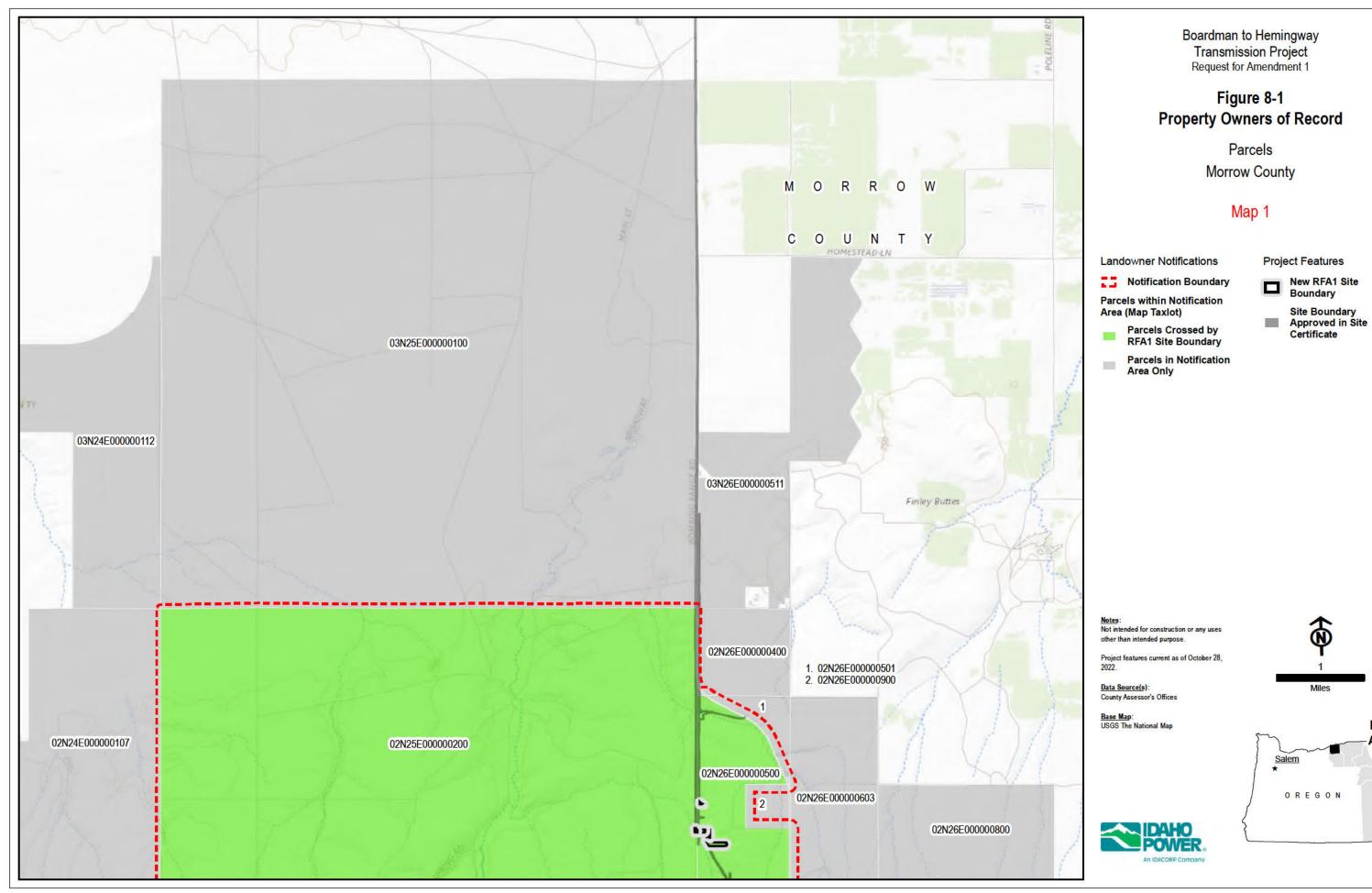


Bureau of Land Management

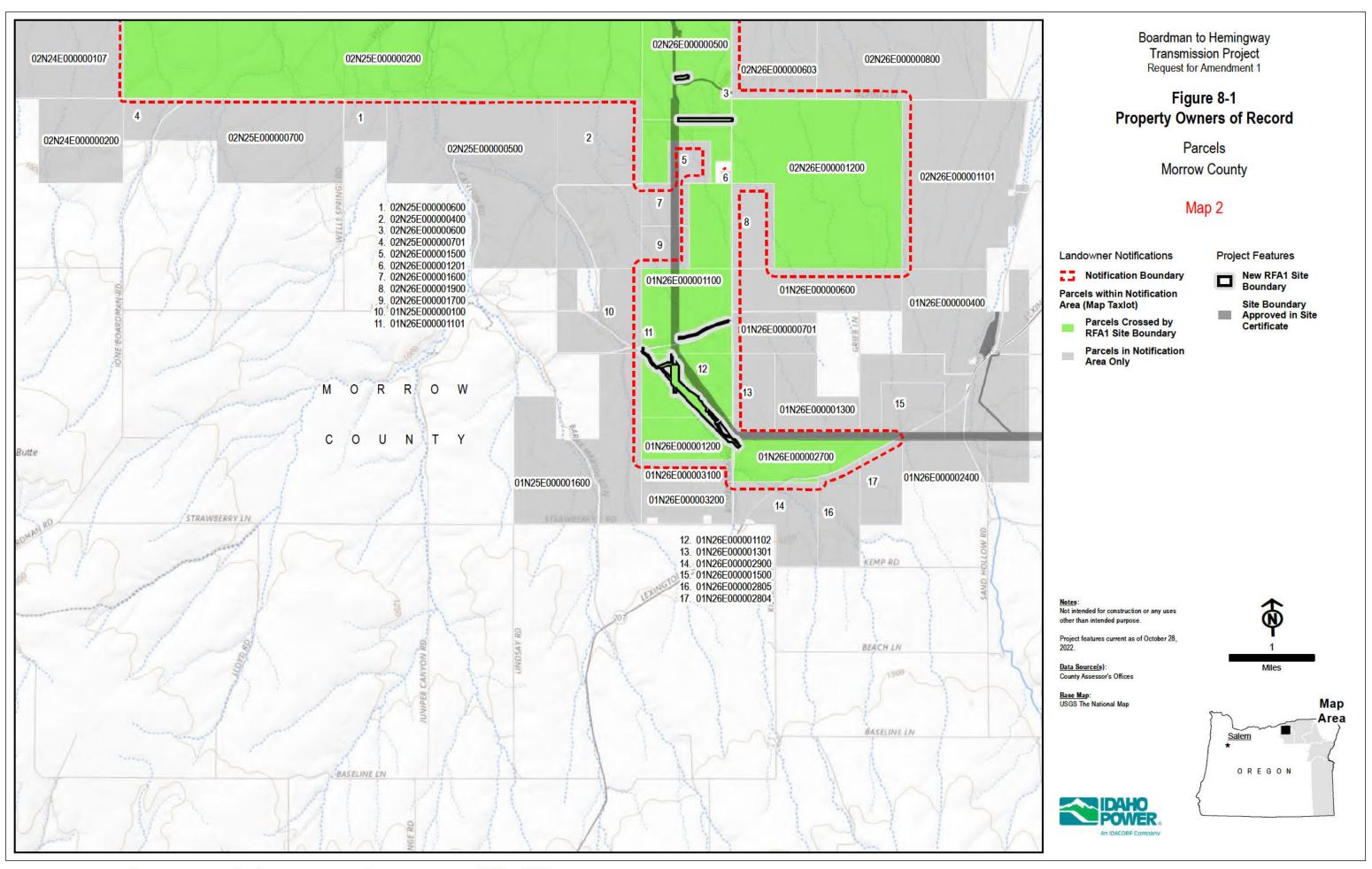
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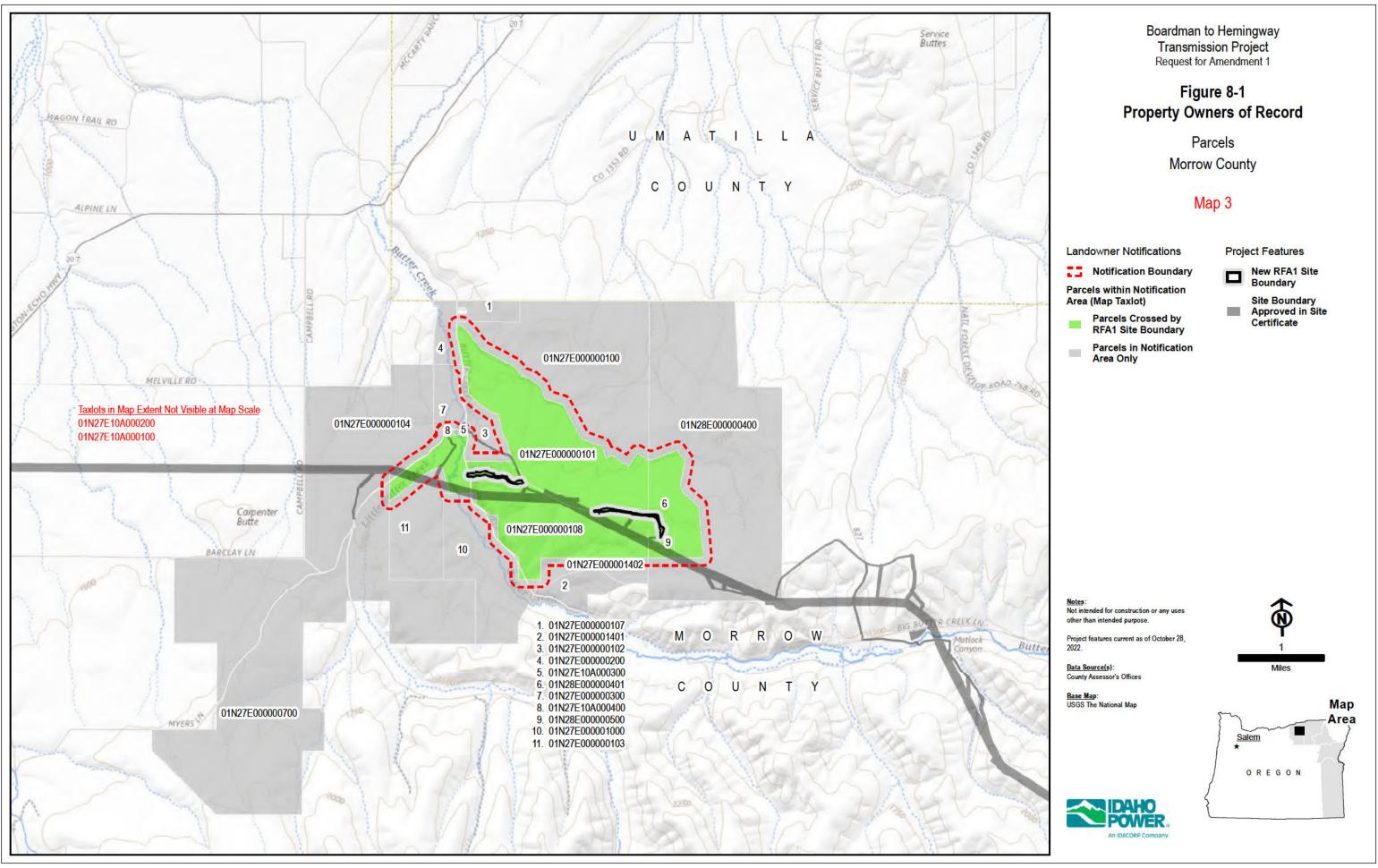
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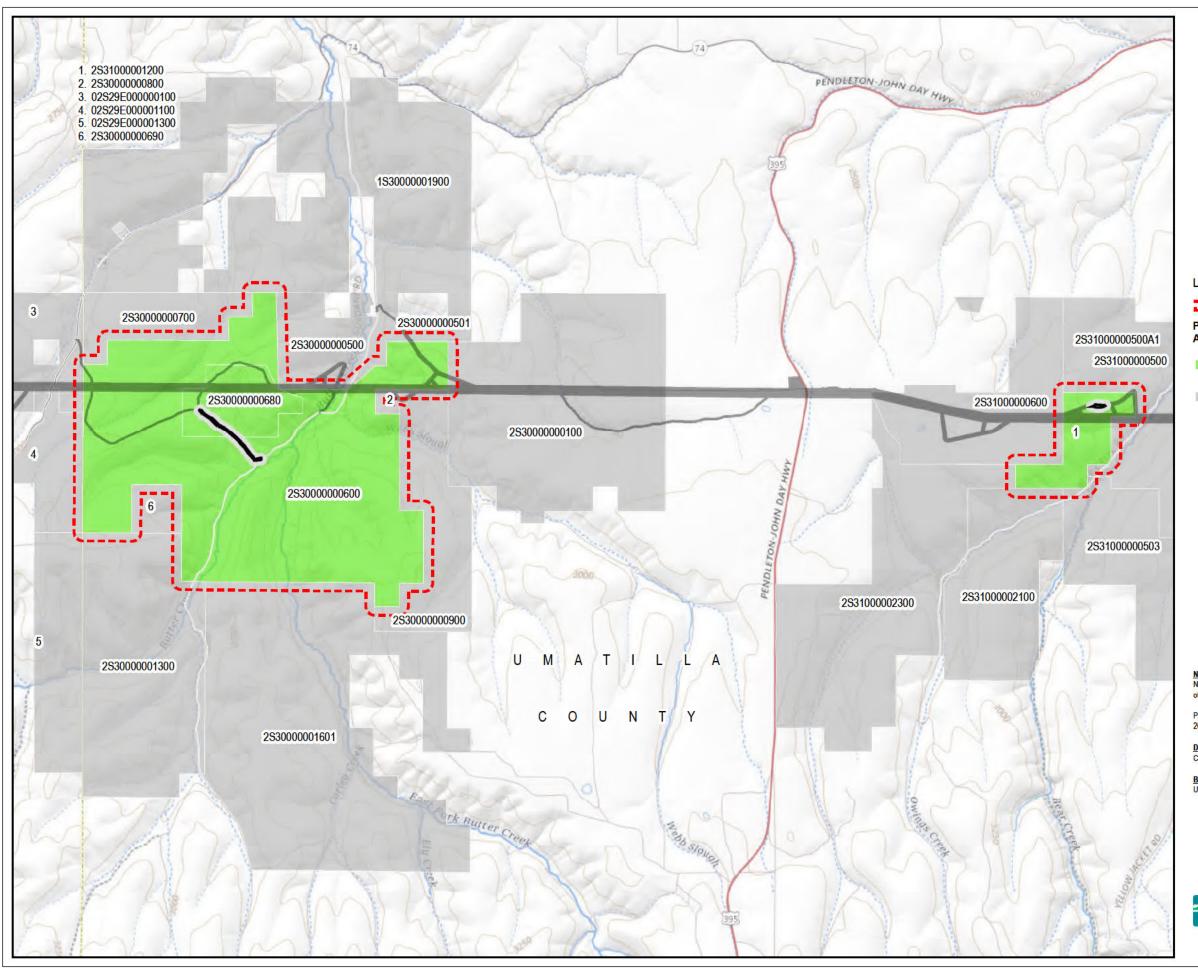
OREGON



Map







# Figure 8-1 Property Owners of Record

Parcels

Morrow and Umatilla County

Map 4

**Landowner Notifications** 

Notification Boundary

Parcels within Notification Area (Map Taxlot)

- Parcels Crossed by RFA1 Site Boundary
- Parcels in Notification Area Only

**Project Features** 

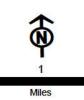
- New RFA1 Site Boundary
- Site Boundary
  Approved in Site
  Certificate

Notes:

Not intended for construction or any uses other than intended purpose.

Project features current as of October 28, 2022.

<u>Data Source(s)</u>: County Assessor's Offices







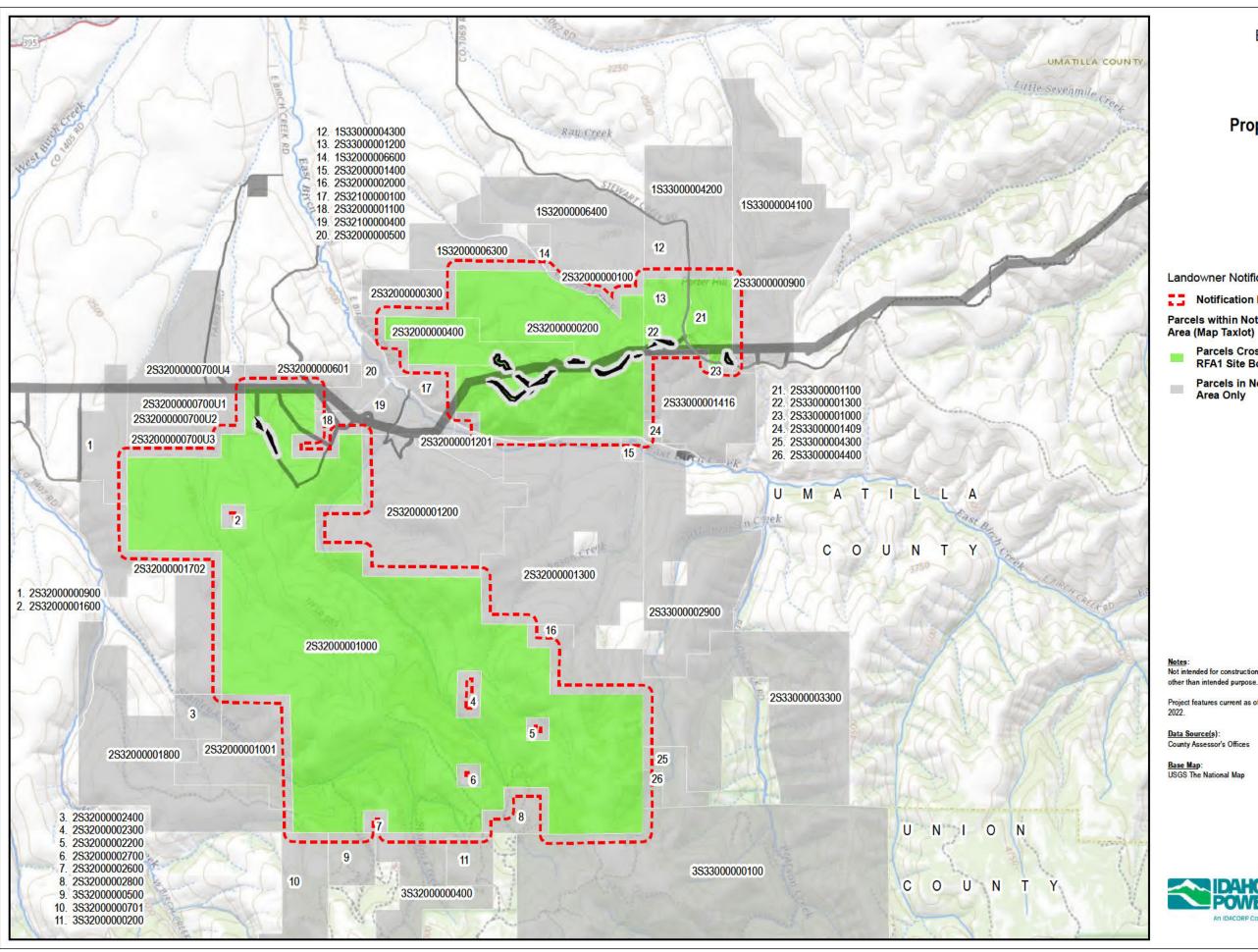


Figure 8-1 **Property Owners of Record** 

> Parcels **Umatilla County**

> > Map 5

**Landowner Notifications** 

Notification Boundary Parcels within Notification

Parcels Crossed by **RFA1 Site Boundary** 

Parcels in Notification Area Only

**Project Features** 

New RFA1 Site Boundary

Site Boundary

Approved in Site Certificate

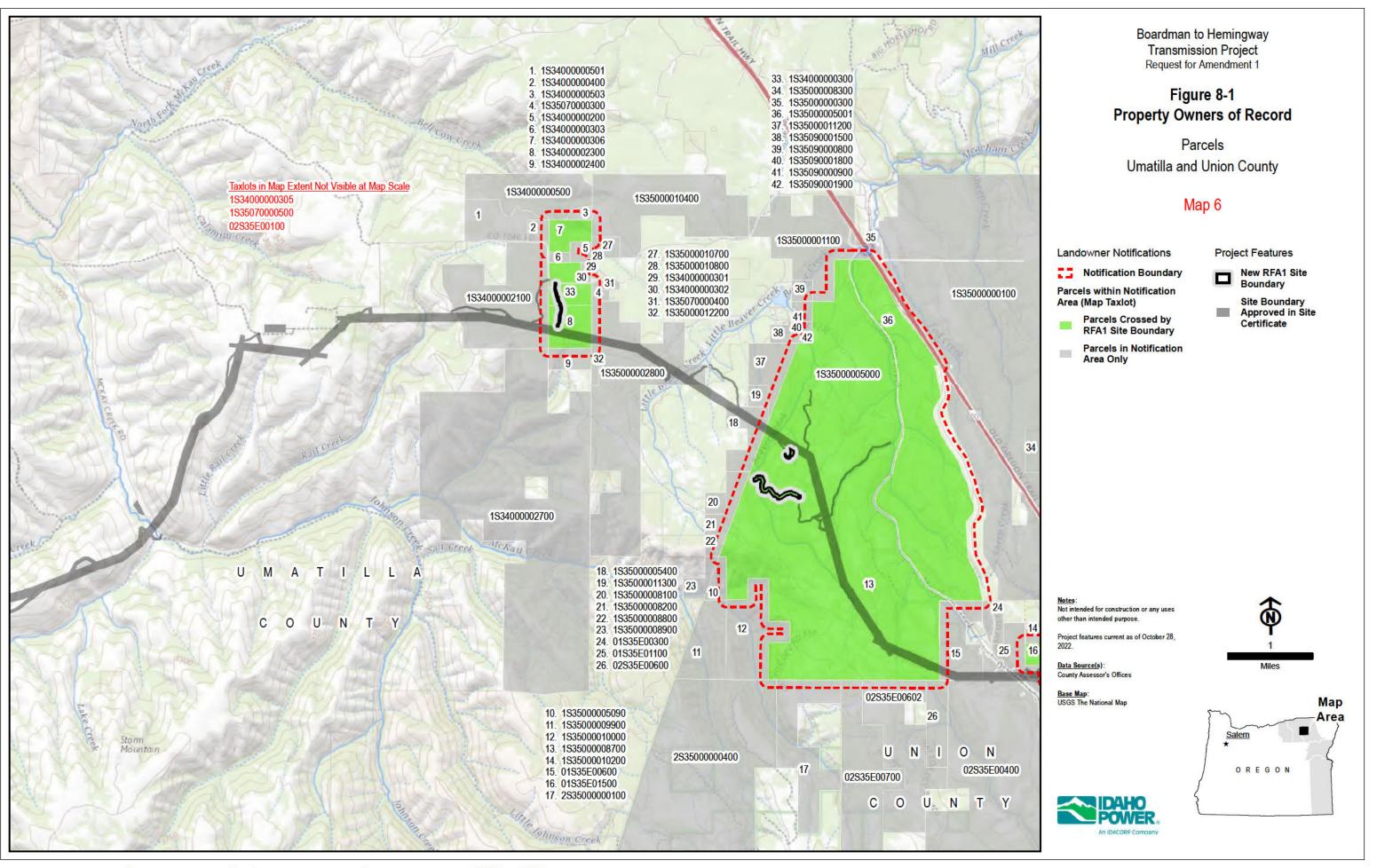
Project features current as of October 28, 2022.

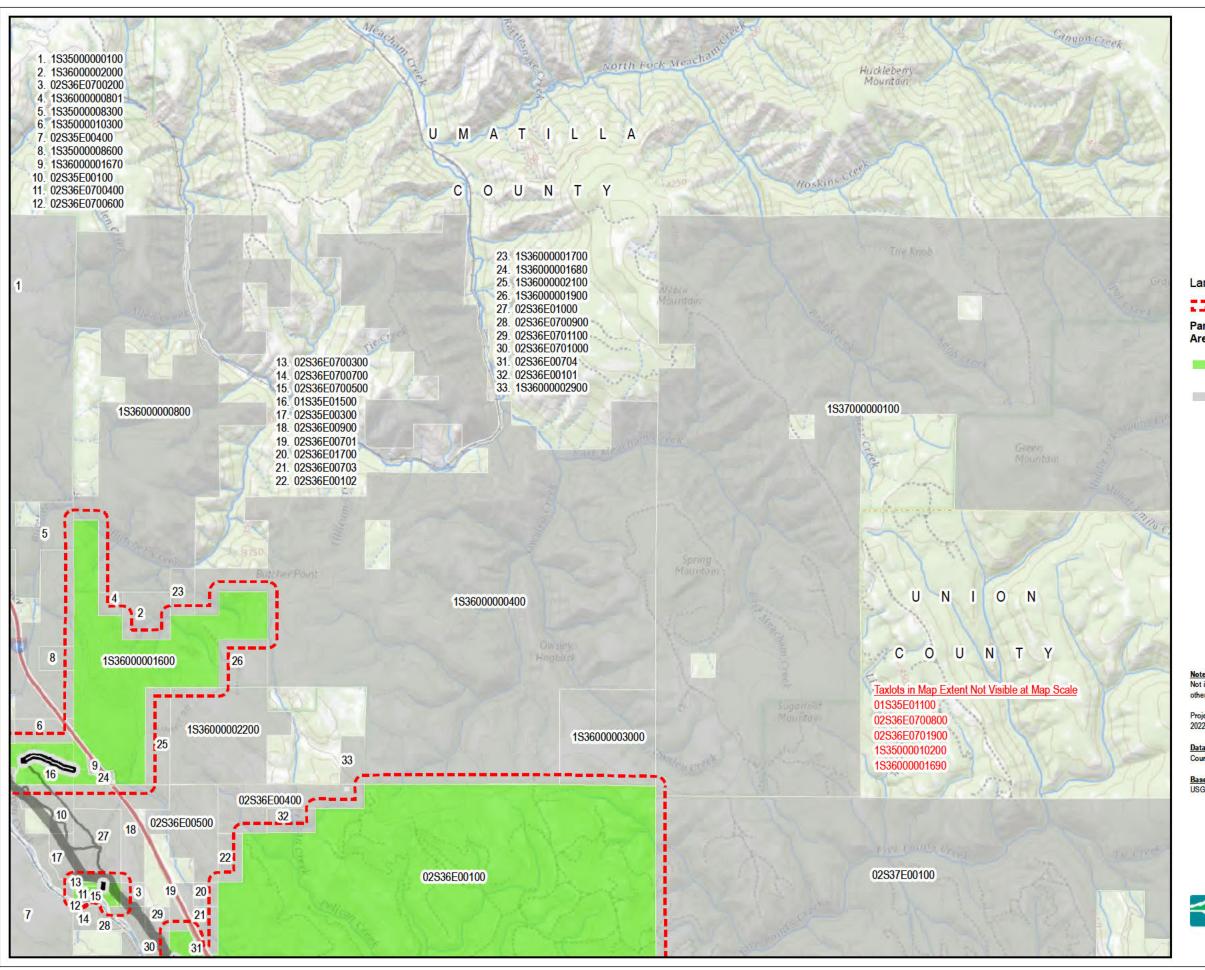
Data Source(s): County Assessor's Offices











### Figure 8-1 **Property Owners of Record**

Parcels Umatilla and Union County

Map 7

Landowner Notifications

Notification Boundary

Parcels within Notification Area (Map Taxlot)

- Parcels Crossed by **RFA1 Site Boundary**
- Parcels in Notification Area Only

**Project Features** 

- New RFA1 Site Boundary
- Site Boundary Approved in Site Certificate

Not intended for construction or any uses other than intended purpose.

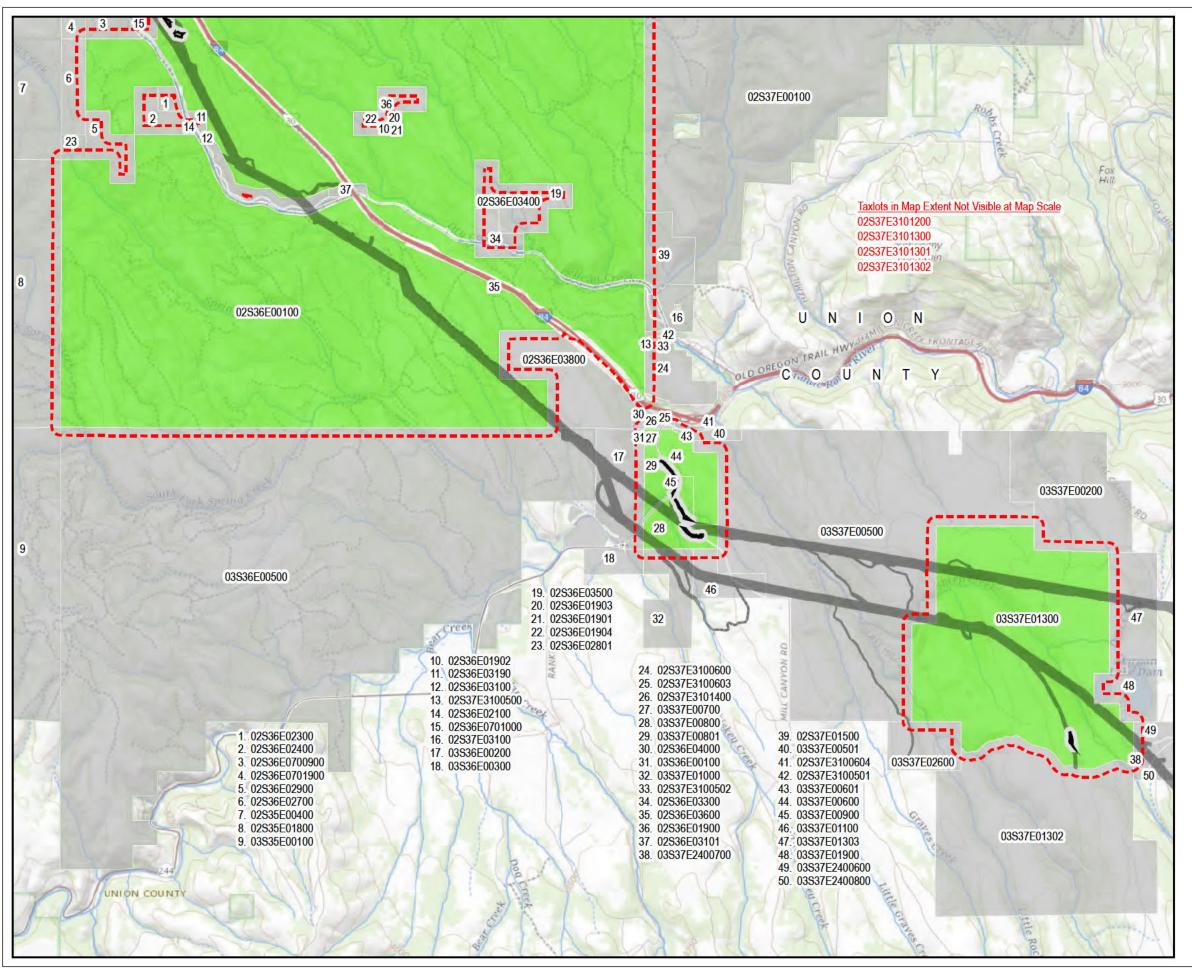
Project features current as of October 28, 2022.

Data Source(s): County Assessor's Offices









### Figure 8-1 **Property Owners of Record**

Parcels **Union County** 

Map 8

Landowner Notifications

Notification Boundary Parcels within Notification Area (Map Taxlot)

Parcels Crossed by **RFA1 Site Boundary** 

Parcels in Notification Area Only

**Project Features** 

New RFA1 Site Boundary

Site Boundary Approved in Site Certificate

Not intended for construction or any uses other than intended purpose.

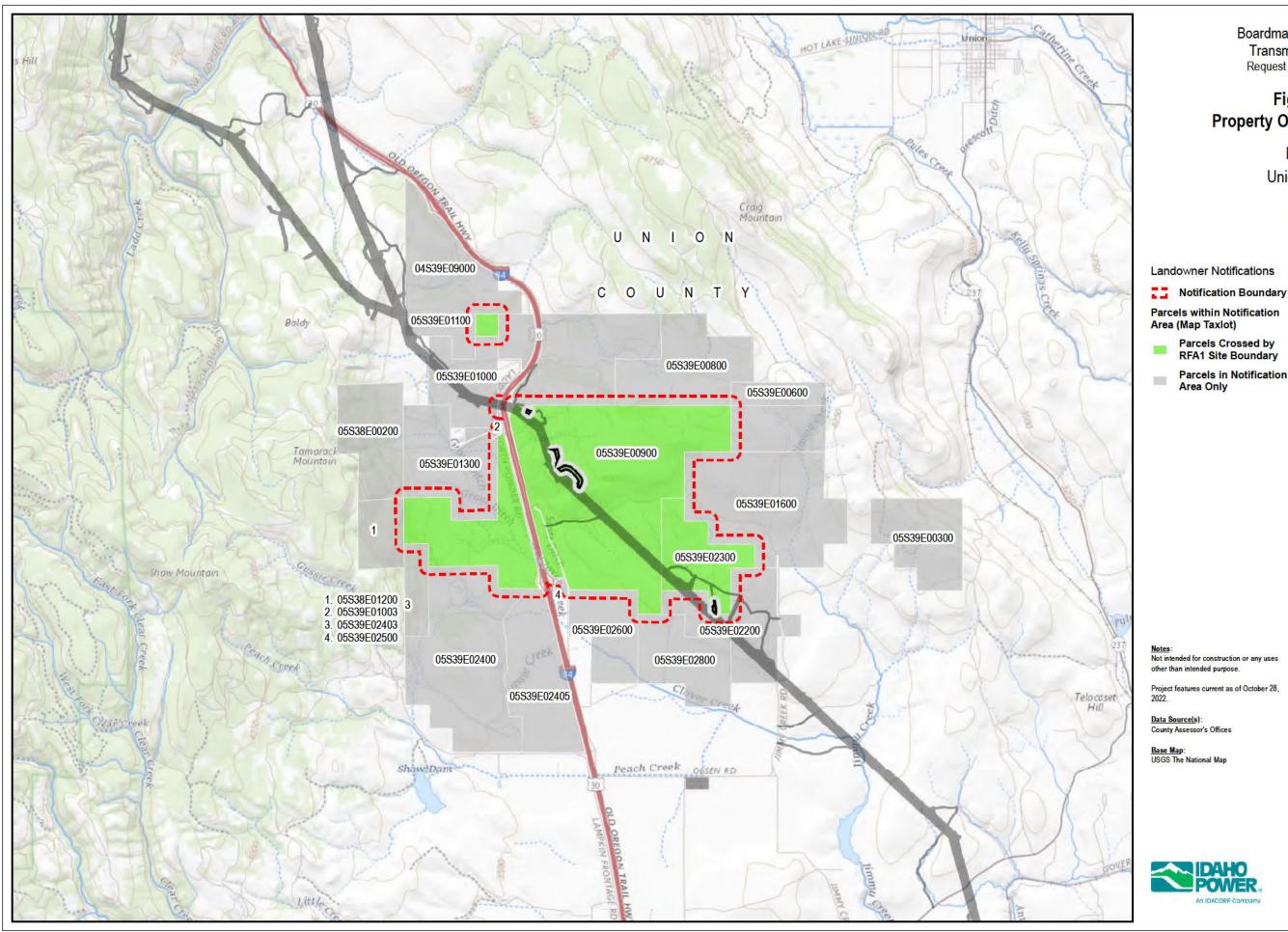
Project features current as of October 28, 2022.

Data Source(s):









### Figure 8-1 **Property Owners of Record**

Parcels **Union County** 

Map 9

Parcels Crossed by RFA1 Site Boundary

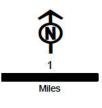
Parcels in Notification Area Only

**Project Features** 

New RFA1 Site Boundary

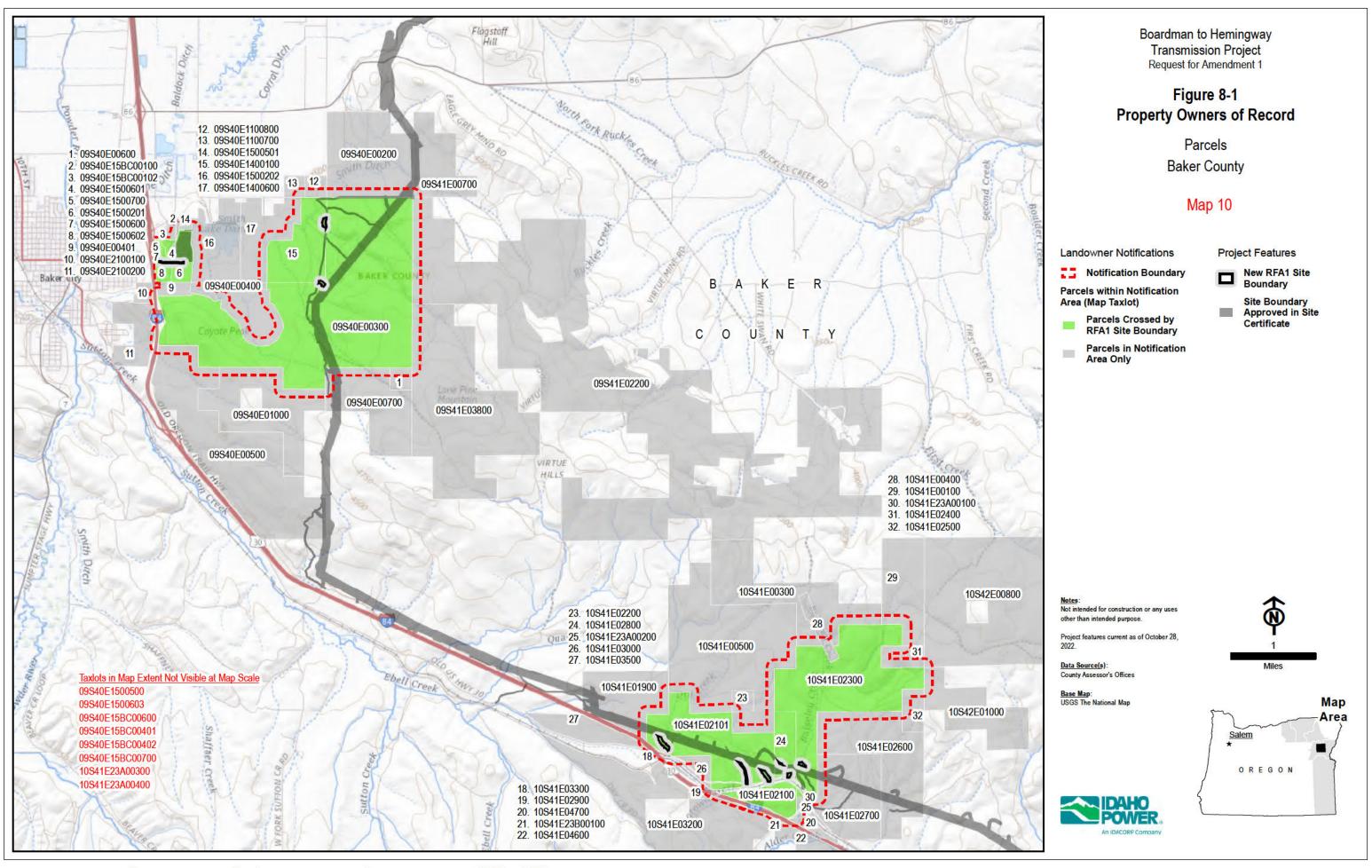
Site Boundary Approved in Site Certificate

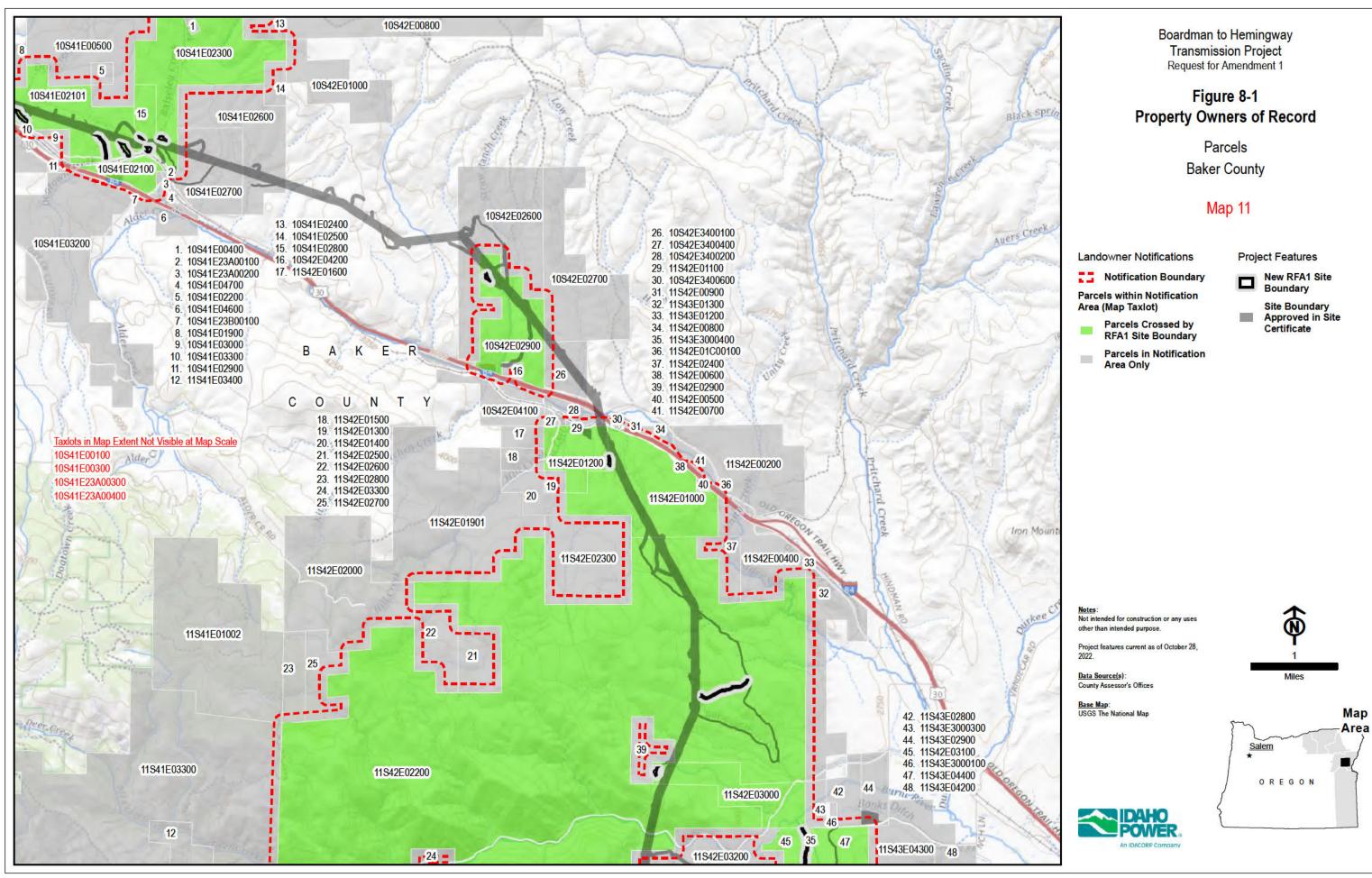
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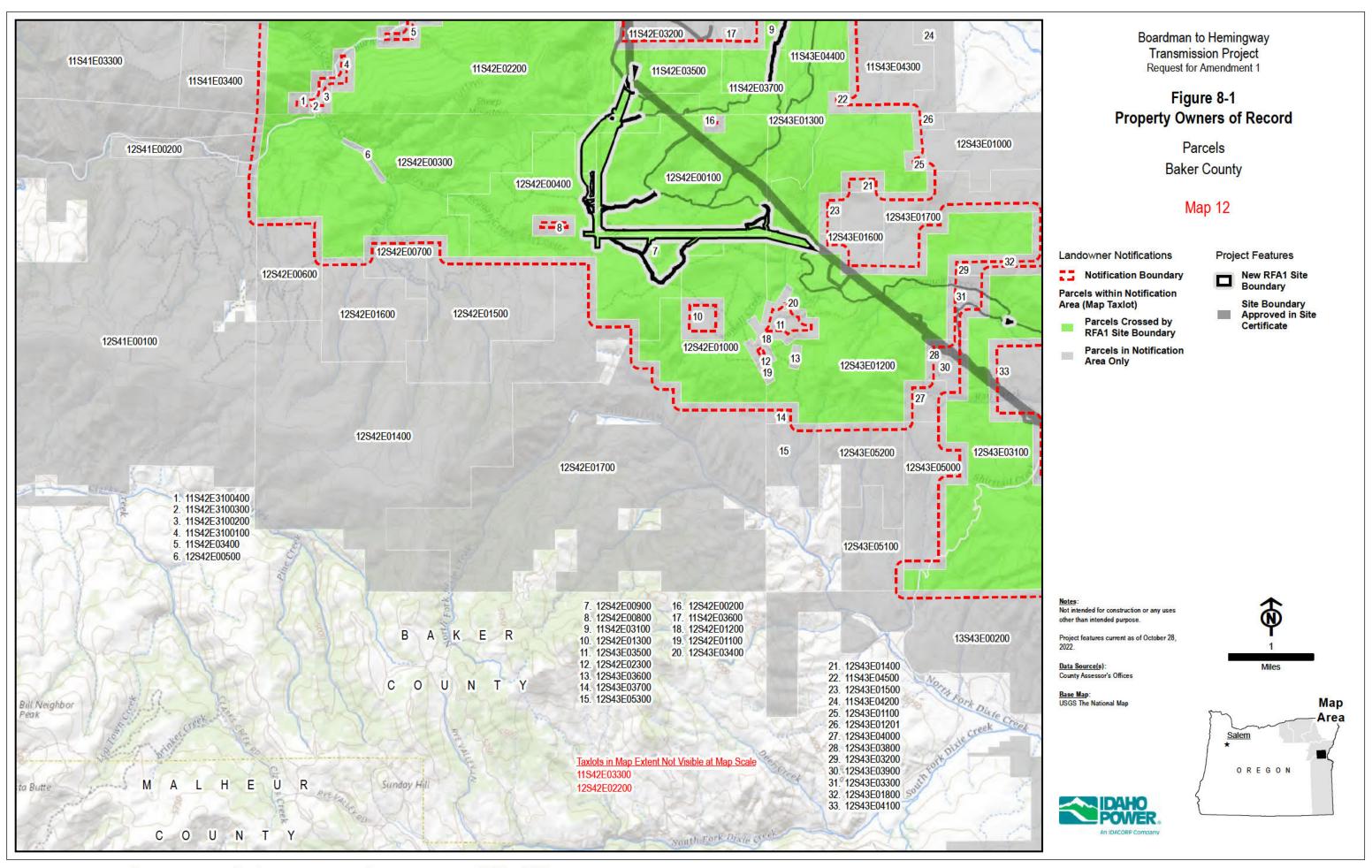


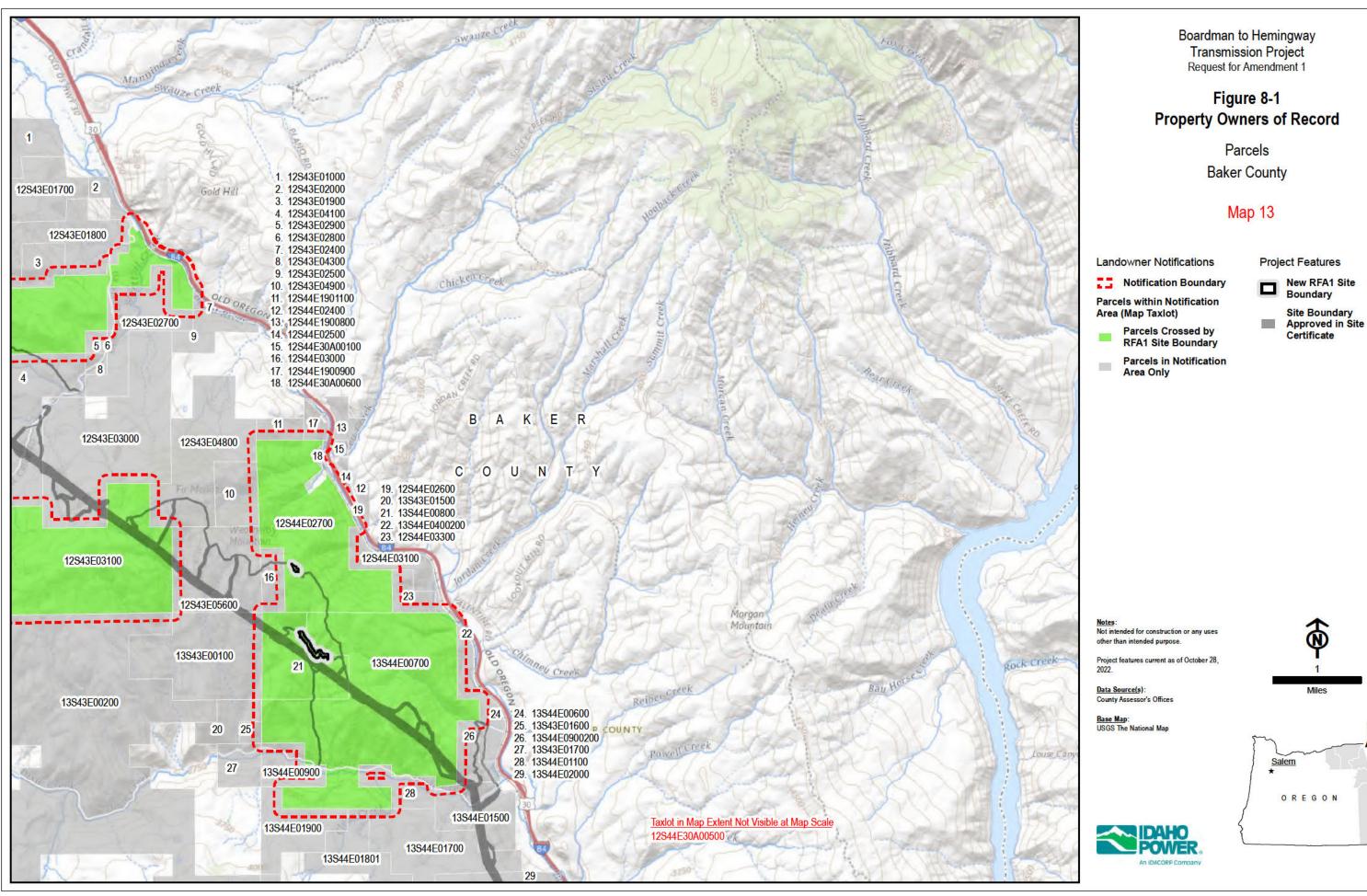






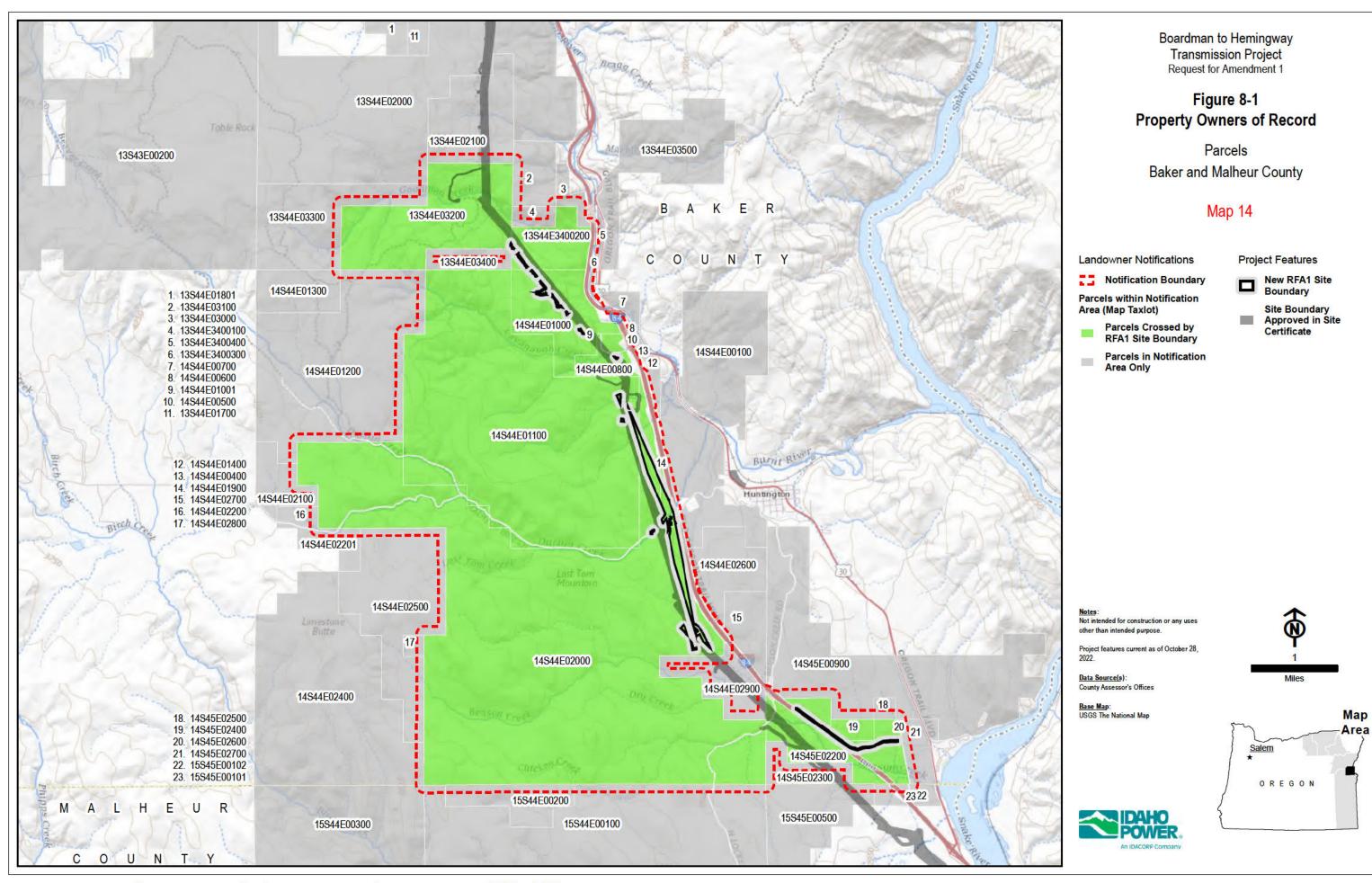


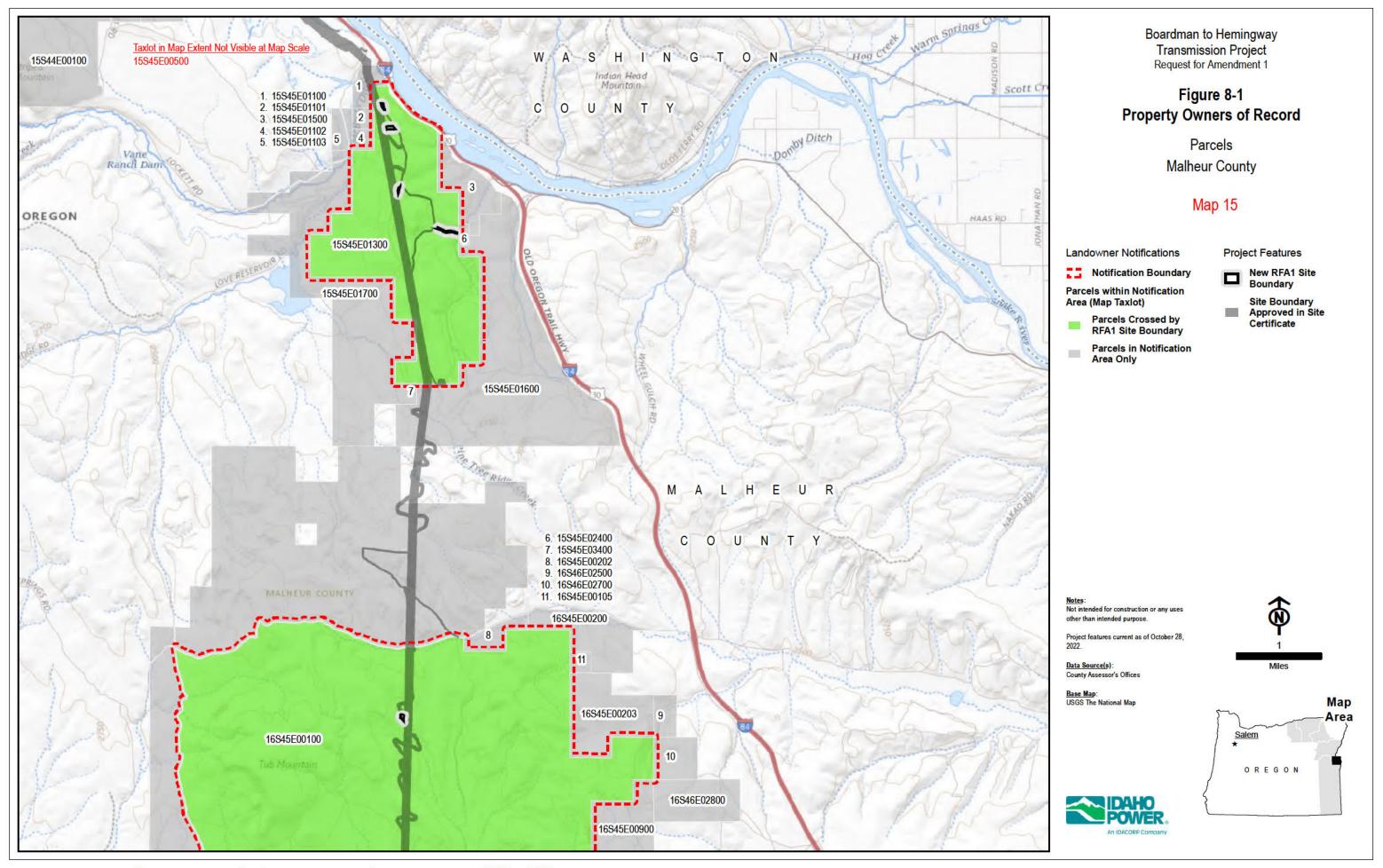


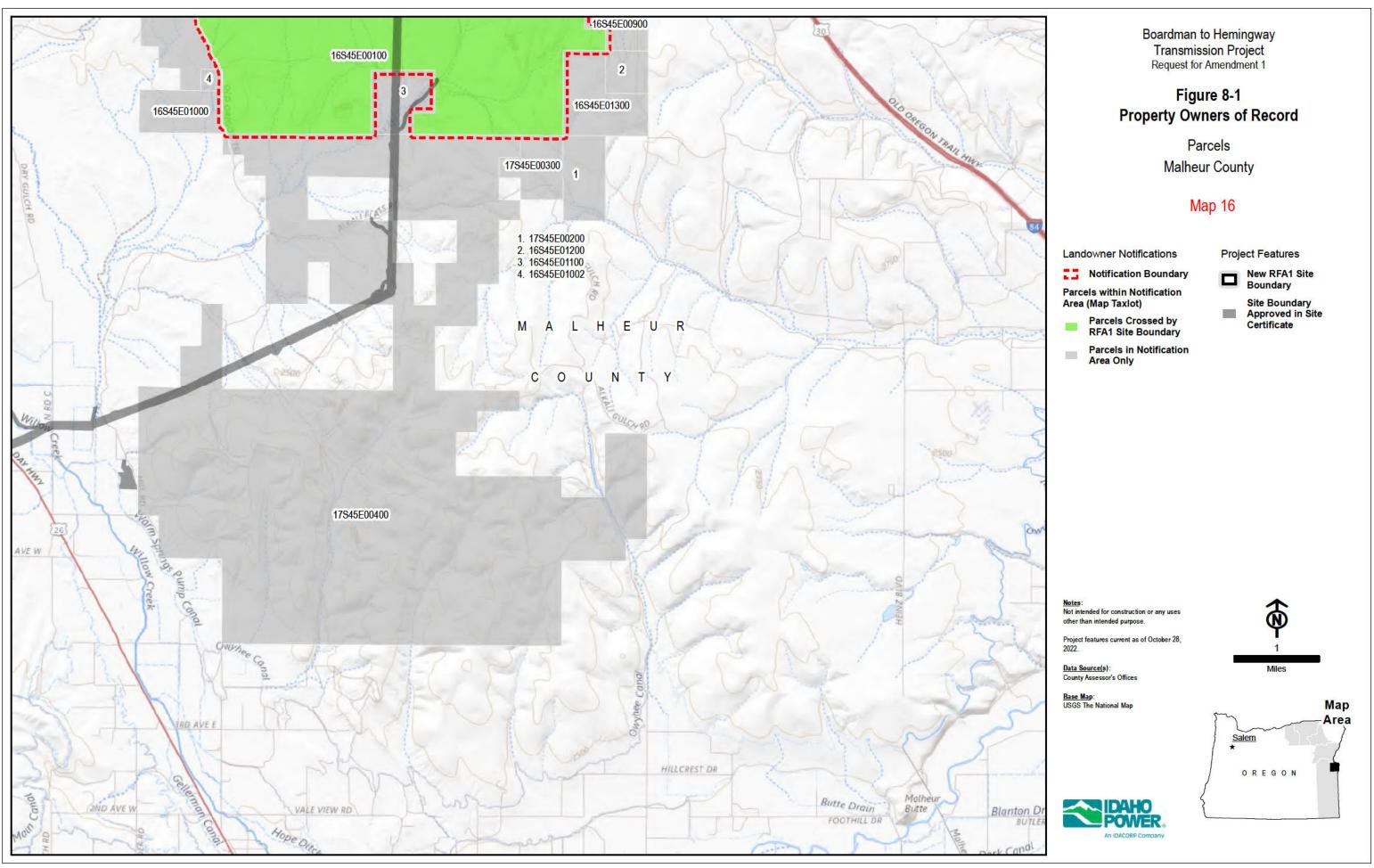


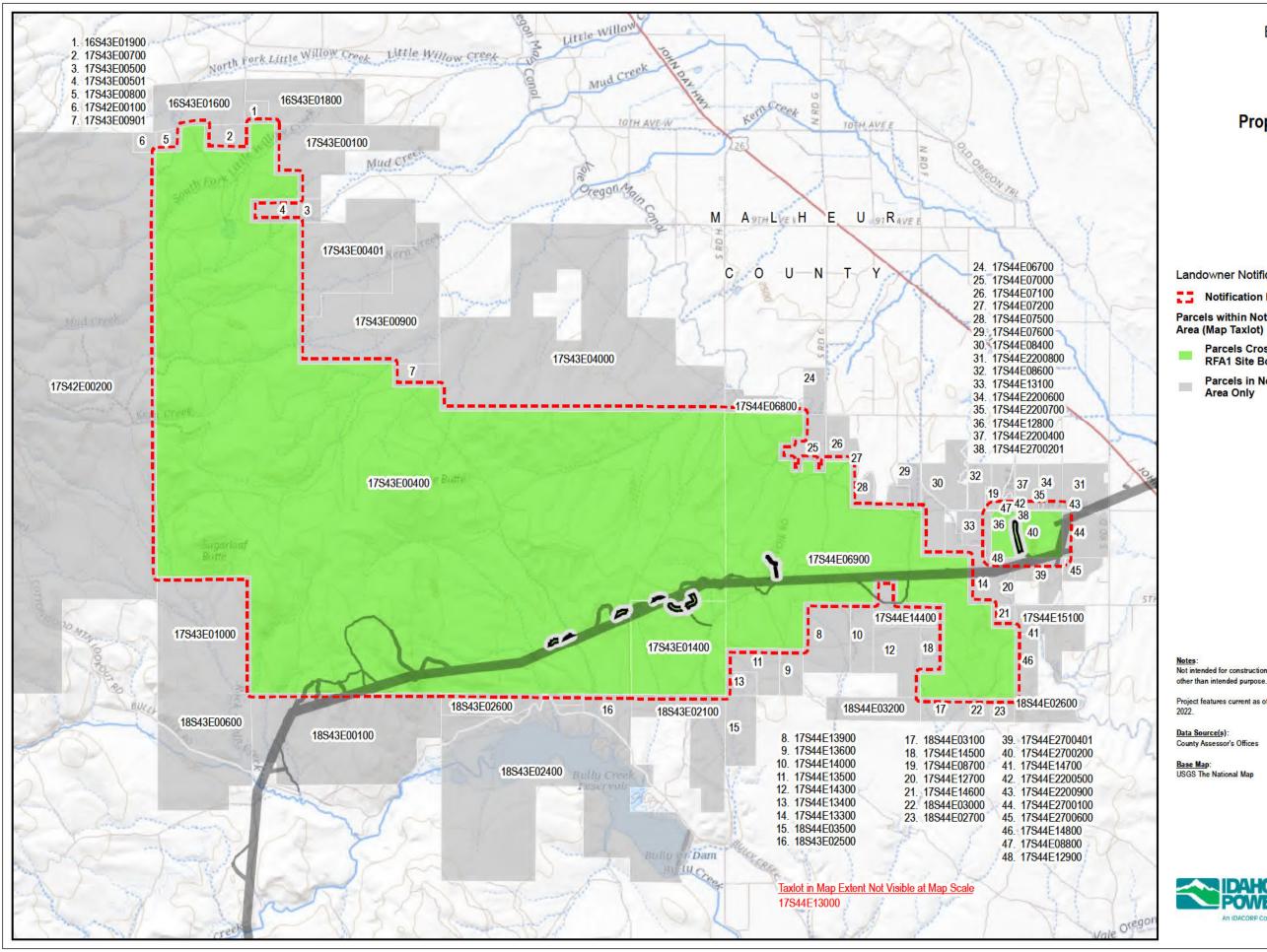
Map

Area









### Figure 8-1 **Property Owners of Record**

Parcels Malheur County

**Map 17** 

Landowner Notifications

Notification Boundary Parcels within Notification

- Parcels Crossed by **RFA1 Site Boundary**
- **Parcels in Notification** Area Only

**Project Features** 

- New RFA1 Site Boundary
- Site Boundary Approved in Site Certificate

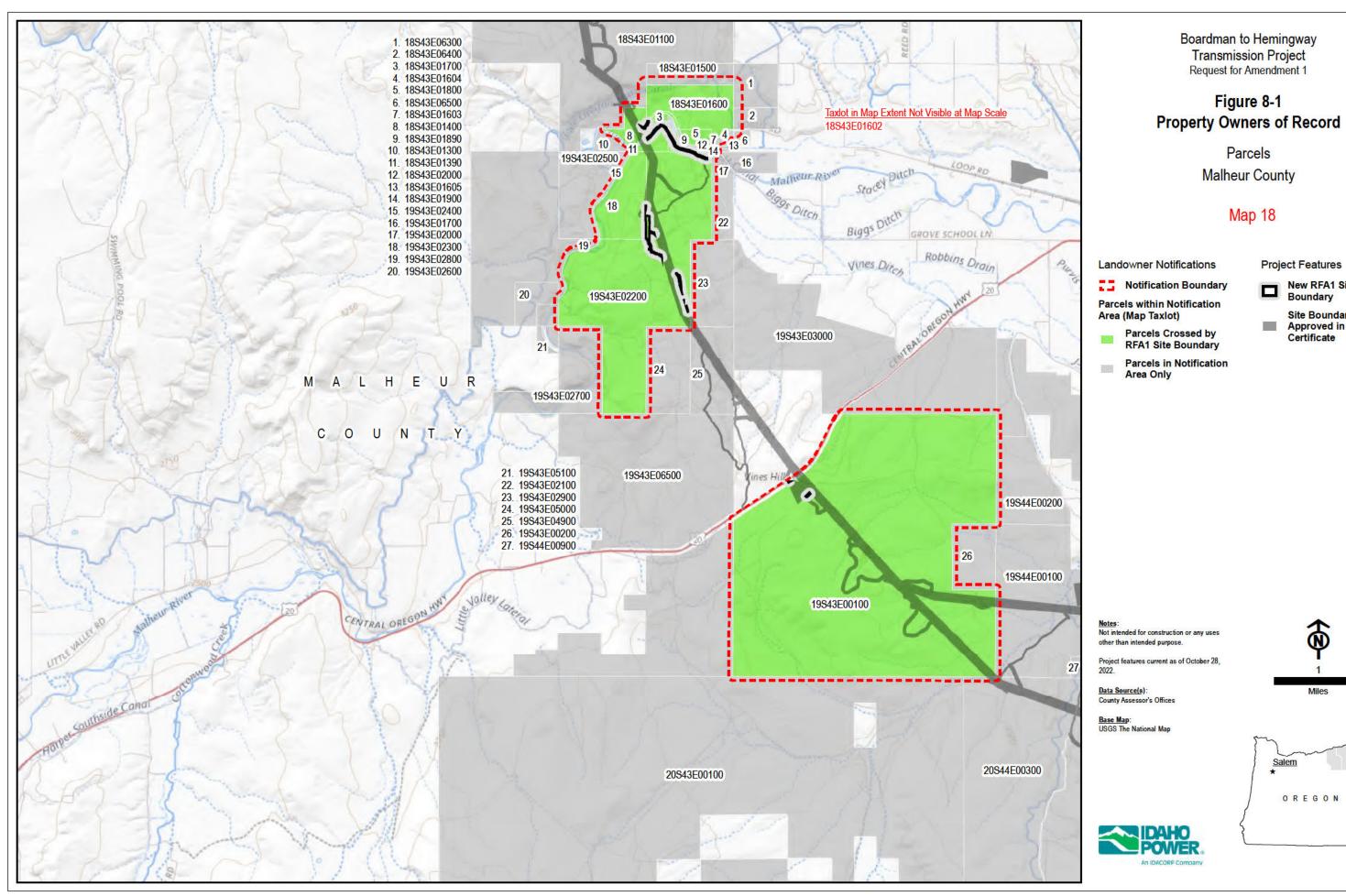
Project features current as of October 28, 2022.

Data Source(s): County Assessor's Offices



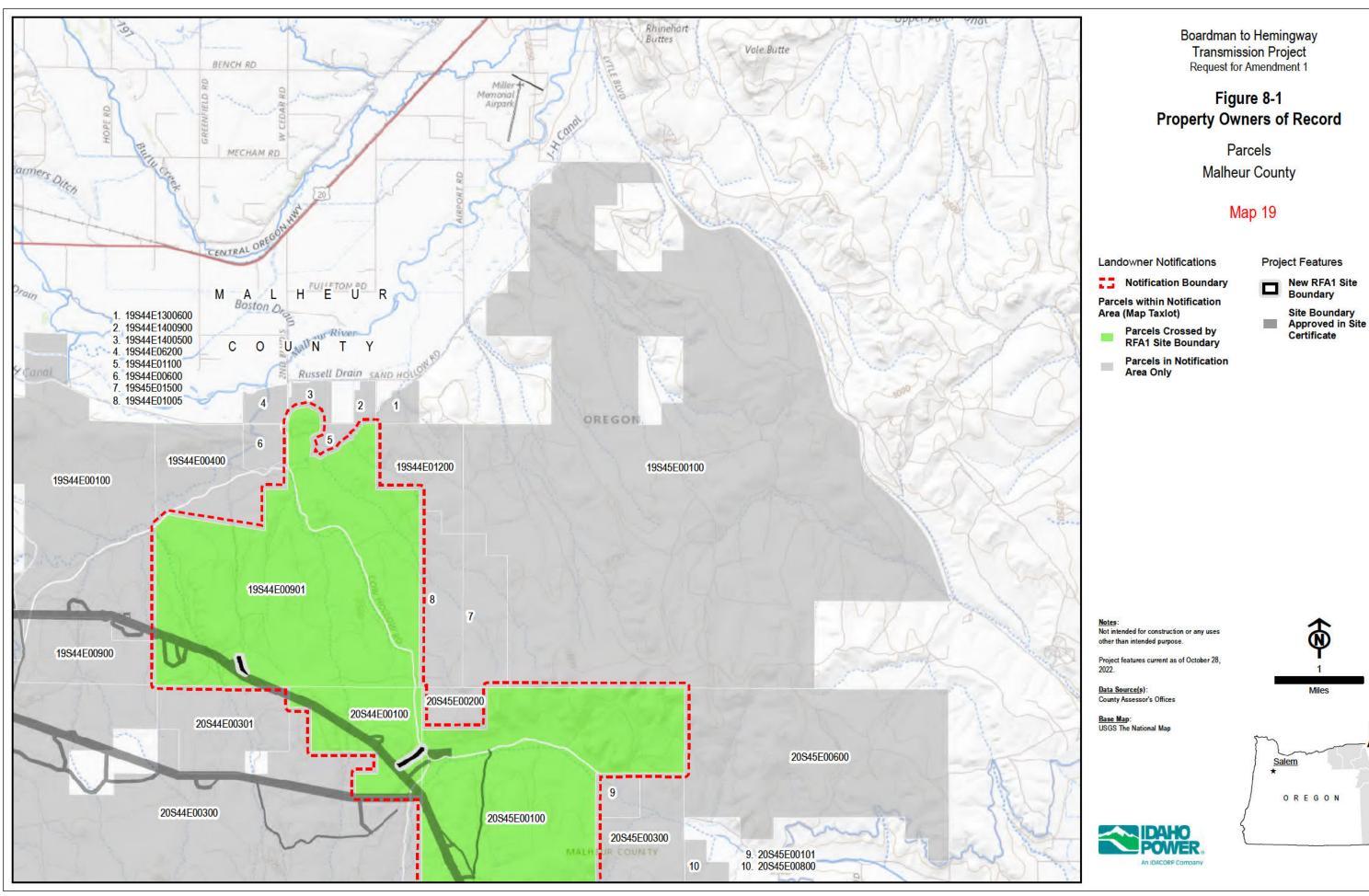


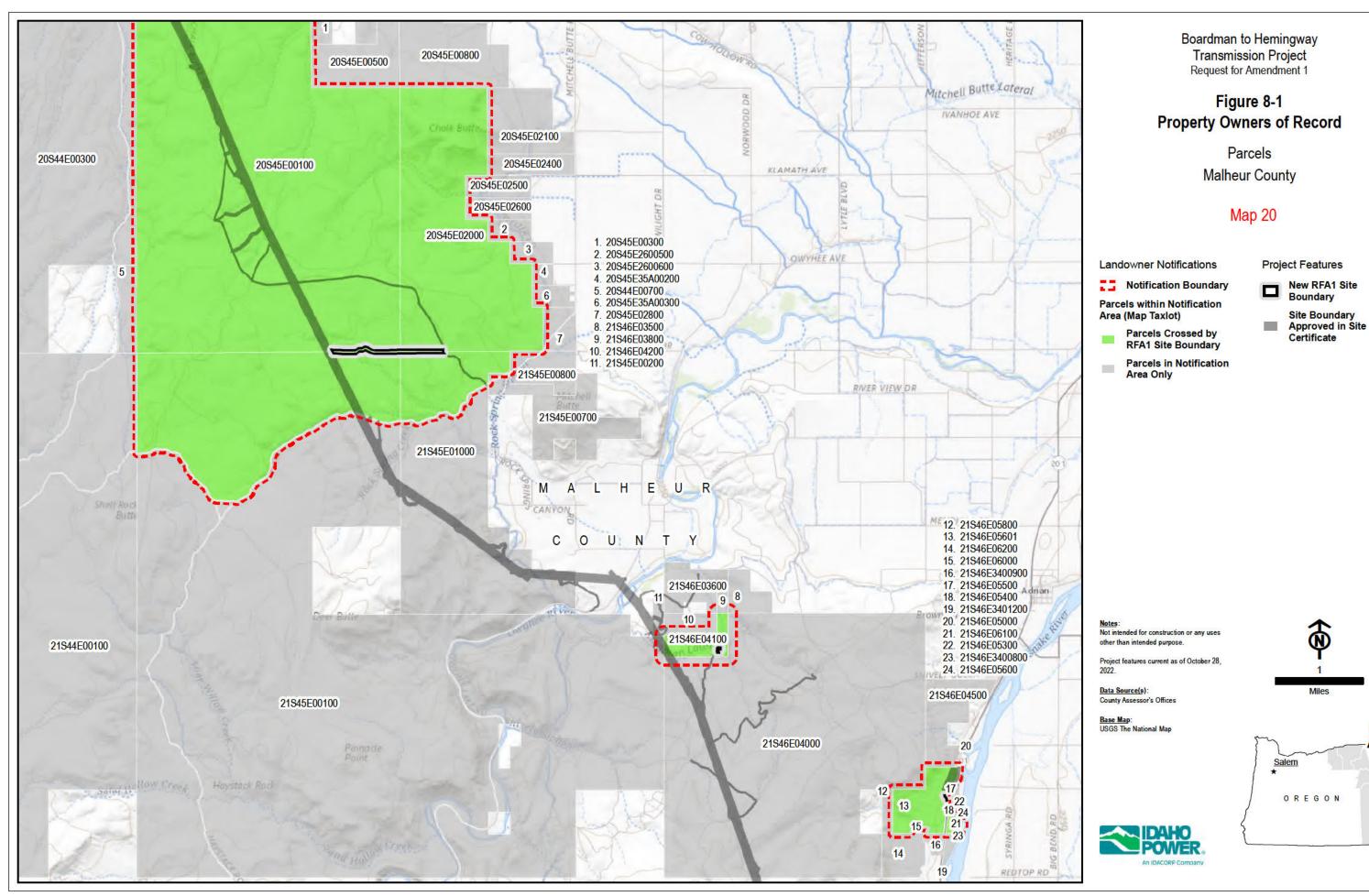




New RFA1 Site Boundary

Site Boundary Approved in Site Certificate





Map

Area

