

B2H Exhibits P1 and P2 Errata Sheet

Dear Reader:

Exhibit P1 describes the potential impacts of the Boardman to Hemingway Transmission Line Project (Project) on fish and wildlife species (other than the endangered and threatened species addressed in Exhibit Q, Greater sage-grouse addressed in Exhibit P2, and elk addressed in Exhibit P3) and their habitats, as well as the steps Idaho Power Company (IPC) will take to avoid, minimize, and mitigate those impacts. Further, Exhibit P1 shows the Project will be consistent with the Oregon Department of Fish and Wildlife's (ODFW) fish and wildlife habitat mitigation goals and standards.

Exhibit P2 describes the potential impacts of the Boardman to Hemingway Transmission Line Project (Project) on Greater sage-grouse (*Centrocercus urophasianus*, hereafter "sage-grouse") and its habitat, as well as the steps Idaho Power Company (IPC) will take to avoid, minimize, and mitigate those impacts. Further, Exhibit P2 shows the Project will be consistent with the Oregon Department of Fish and Wildlife's (ODFW) fish and wildlife goals and standards, and ODFW's Greater Sage-Grouse Conservation Strategy.

The Applicant submitted its final Application for Site Certification on October 3, 2018. Subsequently, the Oregon Department of Energy requested certain additional information about the Project pursuant to Oregon Administrative Rule (OAR) 345-015-0190(9). This errata sheet provides the requested information—which may include corrections to the exhibit text, tables, figures, and/or proposed conditions—as it relates to Exhibit P1 and Exhibit P2.

As you read this exhibit, please keep in mind that any additional information identified in this errata sheet shall prevail over the contents of the exhibit document itself.

Summary of Additional Information Provided for Exhibit P1 and Exhibit P2

Page #	Section #	Description of Change(s) Made
Throughout Exhibit P1	Throughout Exhibit P1	Throughout Exhibit P1, the text incorrectly refers to the draft Fish Passage Plans and Designs as being in Exhibit BB, Attachment BB-3. The correct reference is Exhibit BB, Attachment BB-2.
P1-54	Table P1-11	Table P1-11 Category 3 Subtotal for permanent impacts corrected from 29.9 to 489.1 acres.
P1-21 & P1-90	Section 3.2.4.8 & Section 4.0	Fish and Wildlife Condition 2 changed to include pre-construction surveys for pygmy rabbits and contingency to perform sage-grouse lek surveys.
P1-26	Section 3.3.2	Added pygmy rabbit colonies to the list of wildlife resources which constitute a Category 2 rating.
P1-70	Section 3.5.5.3	Added pygmy rabbit to Fish and Wildlife Condition 14.
Attachment P1-3, Page 29	Attachment P1-3, Section 6.5	Removed reference to “waiver” in the last sentence to be consistent with other changes made to Attachment P1-3 as a result of previous RAI response (March 2018, RAI 4).
Attachment P1-5, Page 24 & Page 25	Attachment P1-5, Section 5.3.4 & Section 6.1	Removed reference to “waiver” as requested in previous RAI (March 2018, RAI 4. Language changed as originally recommended by ODOE in RAI 4.

Specific Additional Information Provided for Exhibit P1 and Its Attachments

Throughout Exhibit P1

Description of Additional Information: Nine times throughout Exhibit P1 the text incorrectly refers to the draft Fish Passage Plans and Designs as being in Exhibit BB, Attachment BB-3. The correct reference is Exhibit BB, Attachment BB-2.

Page P1-54, Table P1-11

Description of Additional Information: Table P1-11 Category 3 Subtotal for permanent impacts corrected from 29.9 to 489.1 acres.

Text Edits Shown in Red:

Table P1-11. Direct Impacts to Fish and Wildlife Habitat from the Proposed Route

ODFW Category	Habitat Type	Acres Disturbed ¹	
		Temp	Perm
2	Agriculture ²	95.0	10.6
	Bare Ground Cliffs Talus	2.0	0.3
	Douglas Fir/ Mixed Grand Fir	5.9	159.6
	Ponderosa Pine	0.3	247.2
	Western Juniper / Mountain Mahogany Woodland	0.6	129.3
	Ephemeral Stream ³	0.3	0.0
	Intermittent Stream ³	0.6	0.3
	Perennial Stream ³	0.1	0.1
	Ponds and Lakes ³	0.0	0.0
	Herbaceous Riparian	0.0	0.1
	Introduced Riparian	0.0	–
	Riparian Woodland and Shrubland	0.5	0.4
	Desert Shrub	15.3	2.7
	Introduced Upland Vegetation	577.0	90.5
	Native Grasslands	475.3	87.8
	Shrub-steppe with Big Sage	801.3	133.2
	Shrub-steppe without Big Sage	121.9	19.9
	Aquatic Bed Wetland ³	0.0	0.0
	Emergent Wetland ³	1.7	0.4
	Forested Wetland ³	0.0	0.0
Scrub-Shrub Wetland ³	25.2	–	
	Category 2 Subtotal	2,123.1	882.7
3	Agriculture	10.1	0.8
	Bare Ground Cliffs Talus	0.3	0.1
	Douglas Fir/ Mixed Grand Fir	3.3	320.8
	Forested-Other	0.0	48.3
	Ponderosa Pine	12.6	88.9
	Ephemeral Stream ²	0.0	0.0
	Intermittent Stream ²	0.2	0.1
	Perennial Stream ²	0.1	0.0
	Ponds and Lakes ²	0.1	–

ODFW Category	Habitat Type	Acres Disturbed ¹	
		Temp	Perm
	Herbaceous Riparian	5.3	0.1
	Introduced Riparian	0.0	0.0
	Riparian Woodland and Shrubland	0.1	0.0
	Desert Shrub	18.1	0.8
	Introduced Upland Vegetation	63.6	0.6
	Native Grasslands	59.8	4.9
	Shrub-Steppe with Big Sage	167.6	22.5
	Shrub-Steppe without Big Sage	3.2	1.2
	Category 3 Subtotal	312.4	29.9 489.1
4	Intermittent Stream ²	0.0	0.0
	Desert Shrub	20.9	0.2
	Native Grasslands	2.7	0.9
	Shrub-Steppe with Big Sage	129.1	21.5
	Shrub-Steppe without Big Sage	12.6	3.5
	Category 4 Subtotal	165.3	26.1
5	Introduced Upland Vegetation	323.0	40.8
	Shrub-Steppe with Big Sage	6.3	2.4
	Category 5 Subtotal	329.3	43.3
6	Agriculture	253.2	44.1
	Developed	57.3	215.7
	Category 6 Subtotal	310.5	259.8

Notes: "Temp" = temporary impacts. "Perm" = permanent impacts.

A "0.0" indicates a value less than 0.1, while a "-" indicates a null or zero value.

¹ Numbers may not sum exactly due to rounding.

² Category 2 agriculture habitat type includes areas that appear to be in CRP within elk or mule deer winter range.

³ The acres of wetlands and waters reflect the occurrence of wetlands and waters presented in Exhibit J. The acres of stream habitats (ephemeral, intermittent, and perennial) presented in this table were quantified using the stream data from Exhibit J; habitat categorization of streams is based on the fish presence determination as detailed in Attachment P1-7B. This table is not intended to inform the analysis of impacts to fish because the methodologies differ; please refer to the discussion on impacts to fish species in Exhibit P1 and Exhibit Q for more detail.

Page P1-21 and Page P1-90

Description of Additional Information: Fish and Wildlife Condition 2 changed to include pre-construction surveys for pygmy rabbits and sage-grouse.

Text Edits Shown in Red:

Fish and Wildlife Condition 2: *Prior to construction, 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:*

- a. Washington ground squirrels;
- b. Raptor nest;
- c. Pigmy rabbits; and

- d. 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.

Page P1-26

Description of Additional Information: In Section 3.3.2, ODFW Habitat Categorization, IPC has added pygmy rabbit colonies to the list of wildlife resources which constitute a Category 2 rating.

Text Edits Shown in Red:

Category 2 habitat:

- ODFW elk (*Cervus canadensis nelsoni*) winter range (ODFW 2013a);4F1
- ODFW mule deer (*Odocoileus hemionus*) winter range (ODFW 2013a);
- Bighorn sheep (*Ovis canadensis*) herd ranges (ODFW 2013b);
- Areas of potential ground squirrel use, defined as areas adjacent to and within 4,921 feet (1.5 kilometers [km]) of WAGS Category 1 habitat, but not occupied by any squirrels either for burrowing or foraging, which is of similar habitat type and quality to the adjacent WAGS Category 1 habitat;
- Fish-bearing streams;
- Bat roosts and hibernacula other than caves; and
- Pygmy rabbit (*Brachylagus idahoensis*) colonies.

Page P1-70 and Page P1-93

Description of Additional Information: Added pygmy rabbit to Fish and Wildlife Condition 14.

Text Edits Shown in Red:

Fish and Wildlife Condition 14: 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 1, 2, or 3, 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 the pygmy rabbit colony or bat roost; and
- c. Any actions the certificate holder will take to avoid, minimize, or mitigate impacts to the pygmy rabbit colony or bat roost.

¹ See Exhibit P3 for a complete discussion of elk habitat categorization.

Attachment P1-3, Page 29, Section 6.5

Description of Additional Information: Removed reference to “waiver” in the last sentence to be consistent with other changes made to Attachment P1-3 during previous RAI response (March 2018, RAI 4).

Text Edits Shown in Red:

All adaptive management actions will be subject to the review and approval of the appropriate land management agency and ODOE. The Construction Contractor(s) will use all reasonable methods to help IPC ensure reclamation is progressing toward the success standards identified in Section 6.4 – Reclamation Goals and Success Standards. To the extent possible, IPC will tailor ROW easements to reduce potential land use conflicts within reclaimed areas by proposing access control (Exhibit B, Attachment B-5) and other means to regulate potentially disruptive land use activities. It is possible some sites will be incapable of supporting adequate vegetation to progress towards the success standards due to conflicting land management and/or environmental limitations not associated with the Project. For instance, reclamation may fail in areas with non-Project related disturbance such as unmanaged OHV access, grazing of domestic livestock, natural disasters such as fire or flooding, and/or construction of other projects. If reclamation failure is determined to be caused by these non-Project related disturbance, IPC will ~~request a waiver from reclamation actions as defined in Section 6.0.~~ coordinate with ODOE regarding appropriate steps forward. IPC may suggest additional reclamation techniques or strategies or monitoring, or IPC may propose mitigation to compensate for any permanent habitat loss.

Attachment P1-5, Page 24, Section 5.3.4

Description of Additional Information: Removed reference to “waiver” as requested in previous RAI (March 2018, RAI 4). Language changed as originally recommended in RAI 4.

Text Edits Shown in Red:

Noxious weed control efforts will occur on an annual basis for the first 5 years post-construction. When it is determined that an area of the Project has successfully controlled noxious weeds at any point during the first 5 years of control and monitoring, IPC will request concurrence from ODOE. If ODOE concurs, IPC will consult with ODOE to design an appropriate plan for long-term weed control. If control of noxious weeds is deemed unsuccessful after 5 years of monitoring and noxious weed control actions, IPC will coordinate with ODOE regarding appropriate steps forward. At this point, IPC may suggest additional noxious weed control techniques or strategies, ~~or may request a waiver from further noxious weed obligations at these sites. If a waiver of noxious weed control is granted, it will include justification for how the waiver is consistent with the appropriate EFSC standards.~~ or monitoring, or IPC may propose mitigation to compensate for any permanent habitat loss.

Attachment P1-5, Page 25, Section 6.1

Description of Additional Information: Removed reference to “waiver” as requested in previous RAI (March 2018, RAI 4). Language changed as originally recommended in RAI 4.

Text Edits Shown in Red:

As stated above, noxious weed monitoring and control will occur during the first 5-year period. When it is determined that an area of the Project has successfully controlled noxious weeds at any point during the first 5 years of control and monitoring, IPC will request concurrence from ODOE. If ODOE concurs, IPC will consult with ODOE to design an appropriate plan for long-term weed control. If control of noxious weeds is deemed unsuccessful after 5 years of monitoring and noxious weed control actions, IPC will coordinate with ODOE regarding appropriate steps forward. At this point, IPC may suggest additional noxious weed control techniques or strategies ~~or may request a waiver from further noxious weed obligations at these sites. or monitoring, or IPC may propose mitigation to compensate for any permanent habitat loss.~~ Noxious weed control measures recommended during monitoring will follow the preventive and control measures outlined in the Final Noxious Weed Plan.

Specific Additional Information Provided for Exhibit P2 and Its Attachments

Page P2-7, Table P2-1

Description of Additional Information: As a result of the modification to Fish and Wildlife Condition 2, Table P2-1 is modified to reflect the contingency to perform pre-construction sage-grouse surveys.

Text Edits Shown in Red:

Table P2-1. Sage-Grouse Surveys

Survey Name	Protocol Used	Total Area Requiring Surveys	Date That Surveys Were Completed	Compliance Strategy
Sage-grouse	ODFW Greater Sage-Grouse Conservation Assessment and Strategy for Oregon (Hagen 2005)	693,130 acres; see Figure P2-1	April 2013	<p>Aerial Surveys Completed</p> <p><u>As necessary to be in compliance with Fish and Wildlife Condition 2, IPC will perform pre-construction sage-grouse surveys of all previously surveyed and unsurveyed areas prior to scheduled construction. Survey results will be provided to ODOE.</u></p>

Page P2-16 and P2-17 (and P2-32)

Description of Additional Information: Addition to Fish and Wildlife Condition 8 clarifying Idaho Power’s approach to sage-grouse mitigation, as requested by ODFW.

Text Edits Shown in Red:

Fish and Wildlife Condition 8: *Prior to construction, the certificate holder shall finalize, and submit to the department for its approval, a final Sage-Grouse Habitat Mitigation Plan.*

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.

b. The final Sage-Grouse Habitat Mitigation Plan shall address the potential sage-grouse 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 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;
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 site certificate shall utilize 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 in-lieu fee program; and
2. Identify the number of credit-acres that each mitigation site will provide for the certificate holder.

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 access roads. As referenced in Fish and Wildlife Condition 25, 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, which will be based on the as-constructed facility and will include indirect impacts from access roads, either by showing the already-implemented mitigation is sufficient to cover all facility component impacts, or by proposing additional mitigation to address any uncovered impacts.

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. 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.