ATTACHMENT I-3 1200-C PERMIT APPLICATION AND DRAFT EROSION AND SEDIMENT CONTROL PLAN



May 3, 2012

Ms. Jackie Ray Oregon Department of Environmental Quality 700 SE Emigrant, Suite 330 Pendleton, OR 97801

Dear Ms. Ray:

Idaho Power Company (IPC) proposes to construct an overhead, high-voltage transmission line, known as the Boardman to Hemingway Transmission Line Project (Project), from near Boardman, Oregon through Morrow, Umatilla, Union, Baker and Malheur counties and into southwest Idaho. We are currently in the permitting phase of the Project that is occurring on two parallel paths. Idaho Power is pursuing a site certificate from the Oregon Energy Facility Siting Council (EFSC) as administered by the Oregon Department of Energy (Department). A federal Environmental Impact Statement (EIS) is also under development. The US Department of Interior, Bureau of Land Management (BLM) is the lead federal agency for the EIS process.

The requirements of the EFSC certificate are found in Oregon Administrative Rules OAR 345, division 021. As part of the required soils analysis (OAR 345-021-0010(i), Exhibit I) the EFSC relies, in part, on meeting soil protection standards by a determination that the Project can be expected to receive a National Pollutant Discharge Elimination System (NPDES) 1200-C permit for stormwater discharge. OAR 345-021-0000(7) allows the applicant to submit the application for the site certificate prior to applying for the federally delegated permit, but requires a copy of the federally delegated permit be submitted to the department to support their completeness finding. An initial corridor alignment has been studied and forms the basis for the preliminary Application for Site Certificate, 1200-C permit, and other ancillary permits, however, the final alignment may be modified as the EIS and EFSC processes proceed. The final 1200-C permit cannot be completed until the two decision bodies concur on the final alignment.

The purpose of this letter is to transmit the preliminary application for a 1200-C stormwater permit for the construction of the Project. IPC is submitting this preliminary application including a preliminary Erosion and Sediment Control Plan (ESCP) to facilitate ODOE and ODEQ review of the preliminary Application for Site certification which is scheduled for submittal to ODOE later this year. In absence of a complete ESCP, based on the final alignment, IPC has included an example of the plan format, content, and details that would comprise the plan when submitted.

The basis for this approach was established at a January 12, 2012 project meeting attended by Ms. Krista Ratliff, of DEQ's Bend, Oregon office. In that meeting Pike Energy, LLC, IPC's engineer, had completed preliminary erosion and sediment control

plan (ESCP) drawings that comply with many of the requirements of the 1200-C permit. The result of that meeting was that IPC would present a preliminary 1200-C permit application, including the preliminary ESCP as a means of furthering the EFSC process. During the meeting, it was stated that the EFSC process can proceed without a final 1200-C permit if DEQ prepares a letter to EFSC that both acknowledges the initiation of the permit application process and states the estimated date when DEQ will complete its review and issue a permit decision. IPC understands that the project cannot proceed until the final 1200-C permit is obtained.

Enclosed are two copies of the preliminary 1200-C permit, including the preliminary ESCP, and the permit fee. We would appreciate your review and comments, with the understanding that later tasks may include DEQ production of the letter to EFSC, after this preliminary permit has been reviewed approved by your office.

We appreciate your consideration in this matter.

Sincerely,

odel alemant

Todd Adams Project Manager

Cc: Z Funkhouser, IPC M Bracke, IPC D Dockter, IPC

File #: NPDES GENERAL PERMIT #1200-C Date Received: Application #: For stormwater discharges to surface waters from construction activities disturbing one acre or more that do not meet automatic coverage requirements. Date Received: Amount: \$
LLID/RM: construction activities disturbing one acre or more Check Name:
that do not meet automatic coverage requirements
that do not meet automatic coverage requirements.
River Mile: Check #:
Legal Name Confirmed: Deposit #:
Notes: Receipt #:
DEQ Notes:
State of Oregon Department of Environmental Quality
Oregon Department of Environmental Quality

A project *may* be eligible for "automatic coverage" under NPDES general permit 1200-CN if stormwater *does not* discharge to a water body with a TMDL or 303(d) listing for sediment or turbidity *and* it meets one of the following criteria (see 1200-CN at http://www.deg.state.or.us/wq/wqpermit/docs/general/npdes1200cn/1200CNPermit.pdf):

1) Disturbs less than one acre and is located in Gresham, Troutdale, or Wood Village.

2) Disturbs less than five acres and is located in Albany, Corvallis, Eugene, Milwaukie, Multnomah Co. (unincorporated areas), Springfield, West Linn, or Wilsonville.

3) Disturbs less than five acres and is within the jurisdictions of Clackamas Co. Water Environment Services [Gladstone, areas within Clackamas Co. Service Dist. #1 (excluding Happy Valley), and areas within the Surface Water Management Agency of Clackamas Co. (including Rivergrove)], Clean Water Services (Banks, Beaverton, Cornelius, Durham, Forest Grove, Hillsboro, King City, North Plains, Sherwood, Tigard, Tualatin, and Washington Co. within Urban Growth Boundary), or Rogue Valley Sewer Services (Central Point, Phoenix, Talent, and portions of Jackson Co. in NPDES MS4 permit area).

Please answer all questions.

			A. PROJECT		FORMATION			
1.	Idaho Power	r Company		2.	Zach Funkhouser			
	Applicant (entity	/ legally responsible	for permit)		Invoice Contact Na	ame (if different from	n applicant)	
	Zach Funkho	ouser			(same as contact ad	dress)		
						Address		
		Address			City	State	Zip	
	Boise	ID	83702					
	City	State	Zip		Telephone	E-Mail	Address	
	(208) 388-5375	zfunkhouser@	idaho power.com					
	Telephone	E-Ma	il Address					
3.	Pike Energy	Solutions,	LLC	4.	To Be Determined		Zip il Address nt Control Inspector il Address 2)	
A	Architect/Engineering Fir	m (Erosion & Sedim	gally responsible for permit) Invoice Contact Name (if different from a given of the second of t	t Control Inspector				
	ŀ	Project Manager			C	ompany Name		
	(503) 937-2000	astoro@	pike.com					
	Telephone	E-Ma	il Address		Telephone	E-Mail	Address	
5.				6.	Nature of Construction A	ctivity		
-	N	Address Address ID Address ID State Sa75 One E-Mail Address Cerrgy Solutions, LLC eering Firm (Erosion & Sediment Contro Storo Project Manager Project Manager Cono E-Mail Address Name of Project n to Hemingway Transmission Address or Cross Street State						
	Boardman to He	mingway Tran	smission Line	Multi-Family Residential (SIC Code 1522)				
	Addre	ess or Cross Street						
					Industrial (SIC Code 1541)			
	City	State	Zip		Highway (SIC Code	1611) T ana ang isa i		
	<i>c</i> ,	• • • • •	—·P				on Line	
	County				☐ Other (include SIC C	ode):		

A. PROJECT INFORMATION (continued)								
7. Approximate location of center of site: Latitude: 45.012 Longitude: -117.838 **For assistance: DEQ Location Tool at <u>http://deggisweb.deg.state.or.us/llid/llid.html</u> **	 8. Project Size: Total Site Acreage (acres): To Be Determined Total Disturbed Area (acres): 5,228.9 							
 9. Stormwater runoff during construction will flow to: Infiltration device(s) Creek/Stream (provide name): Ditch (provide name of receiving stream for ditch): Municipal storm sewer or drainage system (provide name of receiving stream for system): Other: See Attached Table A-9 								
10.Stormwater runoff during construction discharges directly to or the body with a Total Maximum Daily Load (TMDL) or 303(d) listing for								
	//deq12.deq.state.or.us/tmdl/default.aspx or leq.state.or.us/tmdl/default.aspx**							
B. LAND USE COMPA	TIBILITY STATEMENT							
Submit a DEQ Land Use Compatibility Statement (LUCS) form that has been completed by the local land use authority with this application. Attach the <i>original</i> LUCS and, if applicable, written findings by the local authority. DEQ will not process the application unless the local land use authority indicates on the LUCS form that the project is compatible with the local acknowledged comprehensive plan and land use regulations. See Attached Insert B-1 **A copy of this form may be found at http://www.deq.state.or.us/pubs/permithandbook/generallucs.pdf**								
C. SIGNATURE OF LEGALLY A	UTHORIZED REPRESENTATIVE							
The legally authorized representative <i>must</i> sign the application.								
I hereby certify that the information contained in this application is truagree to pay all permit fees required by Oregon Administrative Rules annually by DEQ to maintain the permit.	e and correct to the best of my knowledge and belief. In addition, I 340-045. This includes a compliance determination fee invoiced							
Vern Porter	VP, Delivery, Engineering and Operations							
Name of Legally Authorized Representative (Type or Print)	Title							
Signature of Legally Authorized Representative	Date							
APPLICATION AN	D FEE SUBMITTAL							
 To authorize permit registration, the following must be completed and submitted to the appropriate DEQ regional office or DEQ Agent (see list of offices in application instructions, pp. 3-4): DEQ application form signed by the Legally Authorized Representative and meeting the signature requirements below. DEQ LUCS by local land use authority indicating the activity is compatible with local acknowledged comprehensive plan and land use regulations. Include the Findings if so stated on the LUCS. Stormwater Erosion and Sediment Control Plan Narrative, if applicable. Stormwater Erosion and Sediment Control Plan Drawings; full-sized hard copy and electronic PDF files. The fee for a new application is \$1,586 payable to Oregon DEQ and you must submit it with this application. Please note that DEQ will also invoice you for an annual fee of \$804 if your project needs permit coverage for more than a year. These fees are subject to change; please visit http://www.deq.state.or.us/wq/rules/div045/tables.pdf for current fees. If you are sending your application to a DEQ Agent, check with the DEQ Agent for appropriate fees and make check payable to the DEQ Agent. 								

NPDES General Permit 1200-C for Construction Activities Application Instructions

A. PROJECT INFORMATION

- 1. Enter the legal name of the applicant. Permit coverage will be issued to this entity. This is the person, business, public organization, or other entity responsible for ensuring that erosion and sediment controls are in place and in working order through the life of the project.
 - The name must be a legal, active name registered with the Oregon Department of Commerce, Corporation Division in Salem at 503-378-4752 or http://egov.sos.state.or.us/br/pkg web name srch inq.login, unless otherwise exempted by their rules. If the name of the applicant is not registered with the Corporation Division and the applicant is a business entity, attach legal documents that verify the entity's existence with the application. The applicant may not use an assumed business name.
 - Permit coverage may be transferred from one party to another. For example, a developer may apply for a permit and then transfer the permit to a contractor. Transfer forms are available from DEQ or at http://www.deq.state.or.us/wq/stormwater/constappl.htm.
- 2. Provide invoice contact information for billing of DEQ annual permit fee if different from the applicant in #1 above.
- 3. Provide contact information for the Architect or Consulting Engineer who designed the Erosion and Sediment Control Plan (ESCP).
- 4. Provide information on the Erosion and Sediment Control Inspector. This is not a DEQ or DEQ Agent inspector; this is an inspector employed by the applicant. If the inspector has not been selected yet, please provide the name of consultant who prepared the ESCP and their ESC certification. When the inspector is selected, submit to DEQ or to the DEQ Agent, the name, contact information, training and experience (see condition A.12.b.iii of the 1200-C).
- 5. Provide the common name of the project (for example, the name of the subdivision), the location of the site with respect to crossroads in the area, and, if available, a street address.
- 6. Check the box that best describes the nature of the construction activity. If "other" is selected, describe the use and include a Standard Industrial Classification Code (visit http://www.osha.gov/pls/imis/sicsearch.html for codes).
- Enter latitude and longitude for the approximate center of the site (DEQ Location Tool at http://deqgisweb.deg.state.or.us/llid/llid.html or at http://deqapp1/website/lit/data.asp).
- 8. Provide information on the project size as indicated (based on the total project and not just a single phase).
- 9. Indicate where stormwater runoff during construction will flow. Use your best judgment to determine the name of the receiving water body.
- 10. Indicate whether stormwater runoff during construction will discharge directly to or through a storm sewer or drainage system that discharges to a Total Maximum Daily Load (TMDL) or 303(d) listed water body for turbidity or sedimentation. To make this determination, the following tools are available on DEQ's website:
 - Map and table: <u>http://www.deq.state.or.us/WQ/TMDLs/basinmap.htm</u>
 - Lookup tool: <u>http://deq12.deq.state.or.us/tmdl/default.aspx</u>

B. LAND USE COMPATIBILITY STATEMENT

Complete as indicated.

C. SIGNATURE OF LEGALLY AUTHORIZED REPRESENTATIVE

DEFINITION OF LEGALLY AUTHORIZED REPRESENTATIVE:

Please also provide the information requested in brackets []

- **Corporation** president, secretary, treasurer, vice-president, or any person who performs principal business functions; or a manager of one or more facilities that is authorized in accordance to corporate procedure to sign such documents.
- Partnership General partner [list of general partners, their addresses, and telephone numbers].
- Sole Proprietorship Owner(s) [each owner must sign the application].
- City, County, State, Federal, or other Public Facility Principal executive officer or ranking elected official.
- Limited Liability Company Member [articles of organization].
- Trusts Acting trustee [list of trustees, their addresses, and telephone numbers].

(please see 40 CFR §122.22 for more detail, if needed)

NPDES General Permit 1200-C for Construction Activities Application Instructions

APPLICATION AND FEE SUBMITTAL

Submit this application, Narrative Parts I, II & III (if applicable), LUCS, Erosion and Sediment Control Plan(2 full-sized hard copies and 1 PDF copy), and the applicable fee to the appropriate DEQ regional office or DEQ Agent listed below. Contact the appropriate DEQ regional office or DEQ Agent for the best way to submit the electronic version of the ESCP.

- If you are in an area serviced by a DEQ Agent, check with the DEQ Agent for appropriate fees and make check payable to the DEQ Agent.
- If you are sending your application to DEQ, the fee for a new application is \$1,586 payable to the Oregon DEQ. Please note that DEQ will also invoice you for an annual fee of \$804 if your project needs permit coverage for more than a year. These fees are subject to change; visit <u>http://www.deq.state.or.us/wq/rules/div045/tables.pdf</u> for current fees.

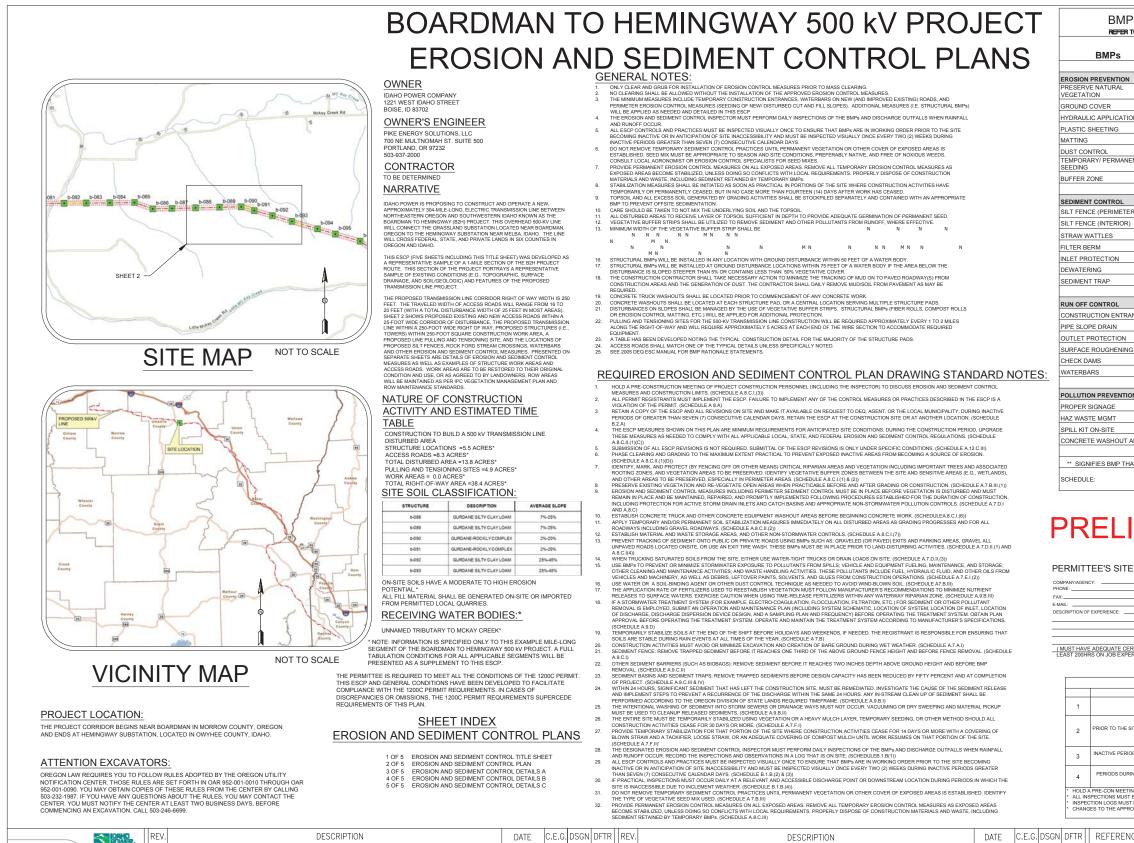
DEQ Northwest Region	DEQ Western Region	DEQ Eastern Region		
2020 SW 4th Avenue, Suite 400	165 East 7th Avenue, Suite 100	700 SE Emigrant Avenue, Suite 330		
Portland, OR 97201-4987	Eugene, OR 97401	Pendleton, OR 97801		
503-229-5438 or 1-800-452-4011	541-687-7326 or 1-800-452-4011	541-278-4605 or 1-800-452-4011		
City of Eugene	City of Hermiston	City of Troutdale		
99 W. 10th Avenue	215 Gladys Avenue	342 SW 4th Street		
Eugene, OR 97401	Hermiston, OR 97838	Troutdale, OR 97060		
541-722-5519	541-667-5025	503-674-7270		
Clean Water Services 2550 SW Hillsboro Highway Hillsboro, OR 97123 503-681-5101 Includes Banks, Beaverton, Cornelius, Durham, Forest Grove, Gaston, Hillsboro, King City, North Plains, Sherwood, Tigard, Tualatin, and portions of Washington Co.	Rogue Valley Sewer Services 138 West Vilas Road, PO Box 3130 Central Point, OR 97502 541-353-4594 Includes Central Point, Phoenix, Talent, White City and portions of Jackson Co.	Clack Co. Water Environmental Services 150 Beavercreek Road, Suite 430 Oregon City, OR 97045 503-742-4567 Unincorporated Clackamas County and areas within the Cities of Rivergrove and Gladstone		

Insert B-1

Idaho Power Company (IPC) is applying for a Site Certification from the Energy Facility Siting Council (EFSC). IPC has elected to follow "Path B" under ORS 504 (1)(b), which means that the site certificate binds state and local jurisdictions to the EFSC's action and requires them to issue permits, licenses, and certificates for construction and operations of the facility. The substantive criteria identified by each county from their county comprehensive plans and land use ordinances are taken into account as part of the site certification process.

	Corridor	Subbasin Name	Subbasin HUC	Total Disturbed Area (acres)	Intermittent		Perennial		303d	
Route/County	Length (miles)				Disturbed Area (acres)	% Total Disturbed Area	Disturbed Area (acres)	% Total Disturbed Area	Disturbed Area (acres)	% Total Disturbed Area
Proposed Corric	lor									
Morrow	36.3	Middle Columbia-Lake Wallula	17070101	218.0	18.8	8.6				
		Umatilla	17070103	312.2	103.7	33.2	8.2	2.6	0.1	<0.1
		Umatilla	17070103	869.0	76.3	8.8	22.0	2.5	1.1	0.1
Umatilla	49.5	Upper Grande Ronde	17060104	11.7						
		Powder	17050203	193.9	18.6	9.6	4.0	2.1	0.3	0.1
Union	39.8	Umatilla	17070103	4.5						
		Upper Grande Ronde	17060104	592.4	25.4	4.3	10.2	1.7		
		Brownlee Reservoir	17050201	39.6	10.3	25.9	9.2	23.3		
Baker	75.0	Burnt	17050202	648.1	68.7	10.6	66.1	10.2	45.7	7.1
		Powder	17050203	532.8	74.4	14.0	7.9	1.5		
		Brownlee Reservoir	17050201	135.4	9.1	6.7	1.2	0.9		
		Bully	17050118	148.8	16.4	11.0	2.9	2.0	1.3	0.9
Malheur	73.8	Lower Malheur	17050117	329.4	59.4	18.0	<0.1	<0.1	2.3	0.7
Maineur	73.0	Lower Owyhee	17050110	251.7	42.4	16.8	2.1	0.8	6.5	2.6
		Middle Snake- Succor	17050103	229.3	51.9	22.6	2.2	1.0		
		Willow	17050119	227.5	20.1	8.8	10.5	4.6	10.5	4.6
Owyhee	23.8	Middle Snake- Succor	17050103	540.0	104.0	19.3	8.1	1.5	6.0	1.1
Total	298.2			5,284.3	699.6	13.2	154.8	2.9	73.7	1.4
Double Mountai	n Alternate									
		Bully	17050118	0.7			<0.1	4.9		
Malheur	7.4	Lower Malheur	17050117	124.9	44.8	35.9				
		Lower Owyhee	17050110	14.7	6.0	41.1				
Total	7.4			140.3	50.9	36.3	<0.1	4.9		

Table A-9. Stormwater Runoff to Streams



 REV.
 DESCRIPTION
 DATE
 C.E.G.
 DSGN
 REV.

 0
 B2H
 REVISE
 DIATE
 10-10-11
 DKR
 KTM
 CAH

 1
 REVISE
 11-22-11
 DKR
 KTM
 KTM
 I

 2
 REVISED FOR DRAFT
 1200-C
 APPLICATION
 3-30-12
 KHK

				OF AVAILABLE BM	
BMPs	CLEARING & GRADING	UTILITY INSTALLATION	FINAL STABILIZATION	"WET WEATHER (OCT. 1 - MAY 31st)"	POTENTIAL DISCHARGE TO TMDL and 303(d)
DREVENTION					
PREVENTION E NATURAL					
ON	** X	x	х	х	x
COVER		x	x	х	x
C APPLICATIONS			x	х	x
HEETING		x		х	х
			x	х	х
TROL	** X	x	x		x
RY/ PERMANENT		x	x	x	x
ONE	** X	x	X	x	x
	^	<u> </u>	~	~	~
CONTROL					
E (PERIMETER)	** X		x	х	x
E (INTERIOR)			x	x	X
ATTLES	x			x	x
RM	X	x		x	x
TECTION	x	x		x	x
ING	x	x		x	x
TRAP	x	x		x	x
		~		~	, A
CONTROL					
CTION ENTRANCE	** X	x	x	х	x
E DRAIN	x	x	x	х	x
ROTECTION	x	x	x	х	x
ROUGHENING	x	x	x	х	x
MS	x	x	x	х	x
RS	** X	x	x	х	x
N PREVENTION					
IGNAGE	** X	x	x	х	x
E MGMT	** X	x	x	x	x
DN-SITE	** X	x	x	x	x
E WASHOUT AREA	1	x	x	x	x
FIES BMP THAT WILL	BE INSTALLED	PRIOR TO ANY	GROUND DISTUR	BING ACTIVITY.	
	YEARS	YEARS	YEARS	YEARS	YEARS
2	1-2	1-3	2-3	1-3	1-3

PRELIMINARY

PERMITTEE'S SITE INSPECTOR:

EXPERIENCE: _____

(MUST HAVE ADEQUATE CERTIFICATION OR TRAINING IN EROSION CONTROL OR AT LEAST 200HRS ON JOB EXPERIENCE SPECIFIC TO EROSION CONTROL)

				_					
INSPECTION FREQUENCY:									
	VE PERIOD	DAILY WHEN STORMWAT FROM SNOWMELT, IS OCC							
	NG INACTIVE OR IN ANTICIPATION IACCESSIBILITY.	ONCE TO ENSURE THAT EROSION AND SEDIMENT CONTROL MEASURES ARE IN WORKING ORDER. ANY NECESSARY MAINTENANCE AND REPAIR MUST BE MADE PRIOR TO LEAVING THE SITE.							
INACTIVE PERIODS GREATER CALEN	WEEKS AND AFTER STORMS 0.25 INCH OR MORE.								
	HE SITE IS ACCESSIBLE DUE TO ENT WEATHER.	IF PRACTICAL, INSPECTIONS MUST OCCUR DAILY AT A RELEVANT AND ACCESSIBLE DISCHARGE POINT OR DOWNSTREAM LOCATION.							
PECTIONS MUST BE MADE IN A TION LOGS MUST BE KEPT IN A	ECT CONSTRUCTION PERSONNEL T ACCORDANCE WITH DEQ 1200 C PE ACCORDANCE WITH DEQ 1200 C PE LAN MUST BE SUBMITTED TO DEQ I	ERMIT REQUIREMENTS. ERMIT REQUIREMENTS.							
REFERENCES I	DATE PROJECT	INFORMATION	TRANSMISS	ION					
DESIGNER: KTM 10		TO HEMINGWAY	DEPARTMENT						
	0-10-11 500kV	LINE #XXX	DRAWING #: TITLE S	SHEET					
	D-10-11 EROSION A	ND SEDIMENT							
SCALE: NTS HORZ. CONTR		ROL PLANS	SHEET #: 1	0F 5					

INITIAL

HAND WRITTEN INITIALS OF

ROSION CONTROL PLAN DESIGNER

