

Attachment 6-1. Red-lined Site Certificate

**ENERGY FACILITY SITING COUNCIL
OF THE
STATE OF OREGON**

**Site Certificate for the
Boardman to Hemingway Transmission Line**

**Issuance Date:
September 27, 2022**

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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
FP	
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.¹ 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.² 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.

¹ B2HAPPDoc3-3 ASC 02a_Exhibit_B_Project Description_ASC 2018-09-28. Section 3.2.2.3 and 3.5.2.

² 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 Dead-end	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 Dead-end, Guyed	3	12	4	NA
230-kV Single-Circuit H-Frame, Tangent	2	12	4	NA
138-kV Single-Circuit 3-Pole Dead-end	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:

- 500-kV circuit breakers
- high-voltage switches, bus supports
- 125-135' transmission line termination structures
- 500-kV series capacitor bank, and 500-kV shunt reactor
- a control house for communications, control equipment, and a restroom facility
- a new all-weather access road
- 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
- a standby generator with a liquefied propane gas tank
- 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.³

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.

³ B2HAPDoc3-3 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
New Roads	Primitive	200 feet	16 feet	10 feet	Yes	Clearing of vegetation or obstructions. Create roads by direct vehicle travel.
	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	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, 71-100% Improved	100 feet	16–30 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.
Existing Roads – No Substantial Modification	No Substantial Modification, 0-20% Improved	NA ¹	NA ¹	NA ¹	No	Repair of existing road to maintain original road function. No betterment of existing road function or design.

¹ 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 pre-construction 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.⁴ 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 multi-use 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).

⁴ B2HAPDoc3-3 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	19.4 20.3
Existing, 71-100% Improved	10.8
New, Bladed	1.4 3.2
New, Primitive	10.6 10.7
Crossings by Approved Route	Number of Crossings*
High-Voltage Transmission Line Crossings ¹	1
Existing Road Crossings ²	3
Existing Railroad Crossings ³	1
¹ Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV. ² Source: Esri (2013); includes Interstate, federal, and state highways. ³ Source: Oregon Department of Transportation (2013). * Approximate.	

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

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	15.6 17.0
Existing, 71-100% Improved	21.2
New, Bladed	5.1 7.1
New, Primitive	7.4
Crossings by Approved Route	Number of Crossings*
High-Voltage Transmission Line Crossings ¹	0
Existing Road Crossings ²	1
Existing Railroad Crossings ³	0
¹ Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV. ² Source: Esri (2013); includes Interstate, federal, and state highways. ³ Source: Oregon Department of Transportation (2013). * Approximate. Source: B2HAPDoc3-9 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

Table 7: Approved Route Features – Union County

Project Features	Number of Sites*
Access Roads	Total Miles*
Existing, 21-70% Improved	31.1 31.4
Existing, 71-100% Improved	6.4 6.5
New, Bladed	7.2 8.6
New, Primitive	0.4
Crossings by Approved Route	Number of Crossings*
High-Voltage Transmission Line Crossings ¹	3
Existing Road Crossings ²	4
Existing Railroad Crossings ³	3
¹ Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV. ² Source: Esri (2013); includes Interstate, federal, and state highways. ³ Source: Oregon Department of Transportation (2013). * Approximate. 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	41.0 44.0

Table 8: Approved Route Features – Baker County

Project Features	Number of Sites*
Existing, 71-100% Improved	22.2 24.0
New, Bladed	22.2 23.5
New, Primitive	6.0 6.2
Crossings by Approved Route	Number of Crossings*
High-Voltage Transmission Line Crossings ¹	9
Existing Road Crossings ²	3
Existing Railroad Crossings ³	1
¹ Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV. ² Source: Esri (2013); includes Interstate, federal, and state highways. ³ Source: Oregon Department of Transportation (2013). * Approximate. Source: B2HAPPDoc3-9 ASC 03_Exhibit C_Project_Location_ASC 2018-09-28, Table C-5.	

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

Malheur County

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	41.7 43.6
Existing, 71-100% Improved	12.8 14.3

Table 9: Approved Route Features – Malheur County

Project Features	Number of Sites*
New, Bladed	53.1 56.8
New, Primitive	13.8 14.1
Crossings by Approved Route	Number of Crossings*
High Voltage Transmission Line Crossings ¹	4
Existing Road Crossings ²	2
Existing Railroad Crossings ³	1
¹ Source: ABB Ventyx (2016) and Idaho Power Company; includes only transmission lines over 69 kV. ² Source: Esri (2013); includes Interstate, federal, and state highways. ³ Source: Oregon Department of Transportation (2013). * Approximate. Source: B2HAPPDoc3-9 ASC 03_Exhibit C_Project_Location_ASC 2018-09-28, Table C-6.	

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

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

- 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.⁵

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 Boundary ¹	Construction Disturbance	Operations Disturbance
Transmission 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				

⁵ B2HAPDoc13 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.

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

Component	Length or Count	Site Boundary¹	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	Varies (0.4 acres)	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 (0.9 acre)	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
Stations				
Longhorn	1	188.9	24.4 acres	19.6 acres
Access Roads⁵				

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

Component	Length or Count	Site Boundary¹	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				
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	7 (Approved Route)/ 2 (Approved Alternative)	50 feet (width)	25 feet (width)	14 feet (width)
Temporary Facilities				
Multi-use Areas	30 (Approved Route)/ 4 (Approved Alternative)	Discrete site boundary; discontinuous 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 Boundary¹	Construction Disturbance	Operations Disturbance
Pulling and Tensioning Sites	299 (Approved Route)/ 32 (Approved Alternative)	Discrete site boundary; adjacent to transmissio	4 acres	–
¹ Site Boundary size may be less than indicated in specific areas to avoid impacts to protected areas or for other reasons. ² No temporary or permanent disturbance expected along centerline, other than for specific facility features indicated below. ³ Component will be sited entirely within the site boundary. ⁴ No permanent disturbance expected once existing towers are removed. ⁵ See the Road Classification Guide and Access Control Plan (Exhibit B, Attachment B-5) for more information about road types. ⁶ 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. ⁷ Certificate holder will construct distribution lines to communication stations within their service territory.				

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

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.).⁶ 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).

⁶ 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: GENERAL STANDARD OF REVIEW (GS) [OAR 345-022-0000]	
GEN-GS-01	<p>a. <u>Construction Commencement Deadline:</u> 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).</p> <p>b. <u>Construction Completion Deadline:</u> 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.</p> <p>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). [General Standard of Review Condition 1, Mandatory Condition OAR 345-025-0006(4)]</p>
GEN-GS-02	<p>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.</p> <p>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.</p> <p>[General Standard of Review Condition 2]</p>
GEN-GS-03	<p>The certificate holder shall design, construct, operate, and retire the facility:</p> <p>a. Substantially as described in the Final Order on the ASC and the site certificate;</p> <p>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</p>

	<p>time the site certificate is issued; and</p> <p>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)]</p>
GEN-GS-04	<p>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)]</p>
GEN-GS-05	<p>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)]</p>
GEN-GS-06	<p>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:</p> <ul style="list-style-type: none"> 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 changes <p>[General Standard of Review Condition 11; Site-Specific Condition OAR 345-025-0010(5)]</p>
STANDARD: ORGANIZATIONAL EXPERTISE (OE) [OAR 345-022-0010]	
GEN-OE-01	<p>The certificate holder shall:</p> <ul style="list-style-type: none"> 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-annual construction progress report required pursuant to OAR 345-026-0080(1)(a) the identity and qualifications of any new or changes to its design, engineering and construction contractors. <p>[Organizational Expertise Condition 2]</p>
GEN-OE-02	<p>The certificate holder shall be responsible for any matter of non-compliance under the site certificate. Any notice of violation (NOV) issued under the site certificate will</p>

	be issued to the certificate holder. Any civil penalties under the site certificate will be levied on the certificate holder. [Organizational Expertise Condition 5]
GEN-OE-03	Within 72 hours after discovery of incidents or circumstances that violate the terms or conditions of the site certificate, the certificate holder must report the conditions or circumstances to the Department, in addition to the requirements of OAR 345-026-0170. [Organizational Expertise Condition 6]
STANDARD: STRUCTURAL STANDARD (SS) [OAR 345-022-0020]	
GEN-SS-01	The certificate holder shall design, engineer, and construct the transmission lines, Longhorn Station, and communication stations in accordance with the International Building Code, Oregon Structural Specialty Code, and local building codes that are most current at the time that final engineering of each of these components is completed and in a manner that does not conflict with National Electrical Safety Code identified in Siting Standards for Transmission Lines Condition 3. [Structural Standard Condition 2]
GEN-SS-02	The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site that are expected to result from all maximum probable seismic events. As used in this rule “seismic hazard” includes ground shaking, ground failure, landslide, liquefaction triggering and consequences (including flow failure, settlement buoyancy, and lateral spreading), cyclic softening of clays and silts, fault rupture, directivity effects and soil-structure interaction. [Structural Standard Condition 3; Mandatory Condition OAR 345-025-0006(12)]
GEN-SS-03	The certificate holder shall notify the Department, the State Building Codes Division and the Department of Geology and Mineral Industries promptly if site investigations or trenching reveal that conditions in the foundation rocks differ significantly from those described in the application for a site certificate. After the Department 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)]
GEN-SS-04	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]	
GEN-SP-01	The certificate holder shall: 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

	<p>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.</p> <p>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.</p> <p>[Soil Protection Condition 1]</p>
GEN-SP-02	<p>The certificate holder shall:</p> <p>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.</p> <p>b. During construction of the facility, the certificate holder shall conduct all work in compliance with the final Construction SPCC Plan.</p> <p>[Soil Protection Condition 2]</p>
GEN-SP-03	<p>Prior to operation, if the certificate holder is required by DEQ statutes or rules to 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.</p> <p>[Soil Protection Condition 3]</p>
GEN-SP-04	<p>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.</p> <p>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.</p> <p>c. During construction, the certificate holder shall conduct all work in compliance with the final Blasting Plan approved by the Department.</p> <p>[Soil Protection Condition 4]</p>
STANDARD: LAND USE (LU) [OAR 345-022-0030]	
GEN-LU-01	For facility components in Morrow County, the certificate holder shall:

	<ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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 County-approved 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. <p>[Land Use Condition 1]</p>
GEN-LU-02	<p>For facility components in Morrow County, the certificate holder shall design the facility to comply with the following setback distances and other requirements:</p> <p><u>Significant Resource Overlay Zone (MCZO Section 3.200(D)(3)(b))</u></p> <ul style="list-style-type: none"> 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). <p><u>Sand Hollow Flood Plain Overlay Zone (MCZO Section 3.100(5.1-1))</u></p> <ul style="list-style-type: none"> 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. <p><u>In the EFU Zone (Based solely on certificate holder representations in the ASC)</u></p>

	<p>c. Buildings and the fixed bases of the transmission line towers shall be setback as follows:</p> <ul style="list-style-type: none"> i. 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. <p>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.</p> <p><u>In the General Industrial Zone (MCZO Section 3.070(D))</u></p> <p>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.</p> <p><u>In the Port Industrial Zone (MCZO Section 3.073(D))</u></p> <p>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:</p> <ul style="list-style-type: none"> i. 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. <p>[Land Use Condition 2]</p>
GEN-LU-03	<p>For facility components in Umatilla County, the certificate holder shall:</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> i. 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 EFU-zoned land. ii. Installation of Utilities on County and Public Roads Permit. 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. <p>[Land Use Condition 3]</p>

<p>GEN-LU-04</p>	<p>For facility components located in Umatilla County, the certificate holder shall design the facility to comply with the following setback distances and other requirements:</p> <p><u>In All Zones:</u></p> <ul style="list-style-type: none"> 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. <p><u>In the EFU Zone (Based solely on certificate holder representations in the ASC):</u></p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> i. 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. <p><u>In the LI zone:</u></p> <ul style="list-style-type: none"> 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.
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	<p><u>In the RTC Zone:</u></p> <p>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.</p> <p>[Land Use Condition 5]</p>
GEN-LU-05	<p>For facility components in Union County, the certificate holder shall:</p> <p>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:</p> <ol style="list-style-type: none"> 1. Flood plain development permit; 2. Road approach permit; and 3. Work in county right-of-way permit. <p>b. During construction, the certificate holder shall comply with conditions of permits listed in (a) and (c).</p> <p>c. 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.</p> <p>[Land Use Condition 6]</p>
GEN-LU-06	<p>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:</p> <p><u>In All Zones:</u></p> <p>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.</p> <p>b. Permanent vegetation removal within the riparian zone of all Class I streams shall retain 75% of all layers or strata of vegetation.</p> <p><u>In the EFU Zone (Based solely on certificate holder representations in the ASC):</u></p> <p>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; (ii) and rear yards shall be set back at least 10 feet from property lines and road rights-of-way.</p> <p>d. A clear-vision area shall be maintained on the corners of all multi-use area properties at the intersection of two or more streets or a street and a railroad as follows: (i) the clear-vision area shall consist of a triangular area with the two lot lines measuring a distance of 30 feet or at an intersection involving an alley of 10 feet; and (ii) the clear-vision area shall not contain any planting, fence, wall, structure, or temporary or permanent obstruction exceeding 2.5 feet in height, except for trees with branches removed to a height of 8 feet.</p> <p>e. Concrete batch plants shall not be located within 2 miles of a vineyard totaling at least 40 acres and which was planted as of February 27, 2013.</p> <p><u>In the Agricultural Grazing Zone:</u></p> <p>f. 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; and (ii) rear yards shall be set back at least 10 feet from property lines and road rights-of-way.</p>

	<p>g. All signage shall comply with the provisions of UCZPSO 3.08. <u>In the Timber-Grazing Zone:</u></p> <p>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.</p> <p>i. All signage shall comply with the provision of UCZPSO 5.08. [Land Use Condition 7]</p>
GEN-LU-07	<p>For facility components in Baker County, the certificate holder shall:</p> <p>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:</p> <ul style="list-style-type: none"> i. Flood plain development permit; ii. Road approach permit; and iii. Work in county right-of-way permit. <p>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.</p> <p>c. During construction, the certificate holder shall comply with conditions of permits listed in (a) and (b). [Land Use Condition 9]</p>
GEN-LU-08	<p>For facility components in Malheur County, prior to construction of any phase or segment of facility components, the certificate holder shall:</p> <ul style="list-style-type: none"> 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. 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. <p>[Land Use Condition 11]</p>
GEN-LU-09	<p>For facility components in Malheur County, the certificate holder shall design the facility to comply with the following setback distances and other requirements: <u>In the EFU and ERU Zones (Based solely on certificate holder representations in the ASC):</u></p> <ul style="list-style-type: none"> a. Buildings shall be setback as follows: <ul style="list-style-type: none"> 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. <p>[Land Use Condition 12]</p>

GEN-LU-10	<p>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</p> <ul style="list-style-type: none"> 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): <ul style="list-style-type: none"> 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. <p>[Land Use Condition 13]</p>
GEN-LU-11	<p>The certificate holder shall:</p> <ul style="list-style-type: none"> 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. 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. 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. <p>[Land Use Condition 14]</p>
GEN-LU-12	<p>The certificate holder shall limit its transmission line right-of-way in Goal 4 forest lands to no wider than 300 feet.</p> <ul style="list-style-type: none"> 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. 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. <p>[Land Use Condition 15]</p>
GEN-LU-13	<p>The certificate holder shall:</p> <ul style="list-style-type: none"> 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 its approval, a final Right-of-Way Clearing Assessment. The protective measures described in the draft Right-of-Way Clearing Assessment in Attachment K-2 of the Final Order on ASC shall be included and implemented as part of the final Right-of-Way Clearing Assessment, unless otherwise approved by the

	<p>Department.</p> <p>b. During construction, the certificate holder shall conduct all work in compliance with the final Right-of-Way Clearing Assessment.</p> <p>[Land Use Condition 16]</p>
STANDARD: PROTECTED AREA (PA) [OAR 345-022-0040]	
GEN-PA-01	<p>During design and construction of the facility, the certificate holder must:</p> <p>a. Coordinate construction activities in Ladd Marsh Wildlife Area with the Wildlife Area manager.</p> <p>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.</p> <p>[Protected Areas Condition 1]</p>
GEN-PA-02	<p>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.</p> <p>[Protected Areas Condition 2]</p>
STANDARD: RETIREMENT AND FINANCIAL ASSURANCE (RT) [OAR 345-022-0050]	
GEN-RT-01	<p>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.</p> <p>[Retirement and Financial Assurance Condition 1, Mandatory Condition OAR 345-025-0006(7)]</p>
STANDARD: FISH AND WILDLIFE HABITAT (FW) [OAR 345-022-0060]	
GEN-FW-01	<p>The certificate holder shall:</p> <p>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:</p> <p>i. Habitat (type/subtype) and disturbance impact (acres) assessment based on final facility design and layout and preconstruction field verification of disturbance areas.</p>

	<ul style="list-style-type: none"> 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 <p>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.</p> <p>[Fish and Wildlife Condition 1]</p>
GEN-FW-02	<p>The certificate holder shall:</p> <ul style="list-style-type: none"> 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 Vegetation Management Plan in Attachment P1-4 of the Final Order on the ASC, 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. <p>[Fish and Wildlife Condition 2]</p>
GEN-FW-03	<p>The certificate holder shall:</p> <ul style="list-style-type: none"> 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 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. <p>[Fish and Wildlife Condition 3]</p>
GEN-FW-04	<p>The certificate holder shall:</p>

- 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:

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

- 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.

Final Habitat Mitigation Plan Shall Address the Following: 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 in-lieu fee program, the final 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. 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

	<p>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.</p> <p>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.</p> <p>[Fish and Wildlife Condition 4]</p>
GEN-FW-05	<p>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.</p> <p>[Fish and Wildlife Condition 6]</p>
GEN-FW-06	<p>Prior to and during construction, the certificate holder shall flag the following environmentally sensitive areas as restricted work zones:</p> <ol style="list-style-type: none"> State protected plant species; Wetlands and waterways that are not authorized for construction impacts; Areas with active spatial and seasonal restrictions; and Category 1 habitat. <p>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.</p> <p>[Fish and Wildlife Condition 7]</p>
GEN-FW-07	<p>During construction and operation, the certificate holder shall employ a speed limit of 25 miles per hour or less on private facility access roads.</p> <p>[Fish and Wildlife Condition 8]</p>
GEN-FW-08	<p>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.</p> <p>[Fish and Wildlife Condition 10]</p>

STANDARD: SCENIC RESOURCES (SR) [OAR 345-022-0080]

GEN-SR-01	The certificate holder shall use dull-galvanized steel for lattice towers and non-specular conductors. [Scenic Resources Condition 1]
GEN-SR-02	If, at final facility design, the transmission line route crosses Ladd Marsh Wildlife Management Area in Union County, the certificate holder shall select transmission 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]
GEN-SR-03	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: <ul style="list-style-type: none"> a. H-frames; b. Tower height no greater than 130 feet; and c. Weathered steel (or an equivalent coating). 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: <ul style="list-style-type: none"> a. H-frames; b. Tower height no greater than 154 feet; and c. Weathered steel (or an equivalent coating). [Scenic Resources Condition 3]
GEN-SR-04	At final facility design, the certificate holder shall select transmission structures, to be constructed in the vicinity of Birch Creek Area of Critical Environmental Concern between approximately Milepost 197.9 and Milepost 199.1, with design modifications including H-frame, with structure height not to exceed 100 feet. [Scenic Resources Condition 4]

STANDARD: HISTORIC, CULTURAL, AND ARCHEOLOGICAL RESOURCES (HC) [OAR 345-022-0090]

GEN-HC-01	During final design and construction of the facility, the certificate holder shall design and locate facility components to avoid direct impacts to Oregon Trail/National 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]
GEN-HC-02	Prior to construction of a phase or segment of the facility, subject to confidential 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.

	[Historic, Cultural and Archeological Resources Condition 2]
STANDARD: RECREATION (RC) [OAR 345-022-0100]	
GEN-RC-01	<p>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.</p> <ul style="list-style-type: none"> a. H-frames; b. Tower height no greater than 130 feet; and c. Weathered steel (or an equivalent coating). <p>[Recreation Condition 1]</p>
STANDARD: PUBLIC SERVICES (PS) [OAR 345-022-0110]	
GEN-PS-01	<p>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:</p> <ul style="list-style-type: none"> a. 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; h. 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 j. The certificate holder shall maintain a customer service telephone line to address, among other things, complaints regarding helicopter operations. <p>[Public Services Condition 3]</p>

GEN-PS-02	<p>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:</p> <ul style="list-style-type: none"> a. 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: <ul style="list-style-type: none"> i. 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. <p>Public Services Condition 6]</p>
GEN-PS-03	<p>The certificate holder shall:</p> <ul style="list-style-type: none"> 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.

	<p>d. Any Wildfire Mitigation Plan required by the Oregon Public Utilities Commission shall be considered by EFSC as meeting the requirements of this condition.</p> <p>[Public Services Condition 7]</p>
STANDARD: WASTE MINIMIZATION (WM) [OAR 345-022-0120]	
GEN-WM-01	<p>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:</p> <ul style="list-style-type: none"> a. 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; c. 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; h. 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; i. 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: <ul style="list-style-type: none"> 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;

	<ul style="list-style-type: none"> 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. I. 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). <p>[Waste Minimization Condition 1]</p>
STANDARD: SITING STANDARDS FOR TRANSMISSION LINES (TL) [DIVISION 24]	
GEN-TL-01	<p>To reduce or manage human exposure to electromagnetic fields, the certificate holder shall design and construct:</p> <ul style="list-style-type: none"> 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. <p>[Siting Standards for Transmission Lines Condition 1]</p>
GEN-TL-02	<ul style="list-style-type: none"> 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. <p>[Siting Standards for Transmission Lines Condition 3, Site-Specific Condition OAR 345-</p>

025-0010(4)]

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

GEN-NC-01

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 numbers of the NSR owners.
- 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:
 - i. 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.

	<ul style="list-style-type: none"> 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 health 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. <p>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.</p> <p>[Noise Control Condition 1]</p>
GEN-NC-02	<ul style="list-style-type: none"> 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. 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

	<p>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.</p> <p>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).</p> <p>e. The plan shall identify the following process if a noise complaint is received:</p> <ol style="list-style-type: none"> 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.
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	<ul style="list-style-type: none"> 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.
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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>[Noise Control Condition 2]</p>
STANDARD: REMOVAL FILL LAW (RF) [OAR 141-085-0500 through -0785]	
GEN-RF-01	<p>The certificate holder shall:</p> <p>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</p>

	<p>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.</p> <p>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.</p> <p>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.</p> <p>[Removal Fill Condition 2]</p>
GEN-RF-02	<p>The certificate holder shall:</p> <p>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.</p> <p>b. 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.</p> <p>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.</p> <p>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.</p> <p>[Removal Fill Condition 3]</p>
GEN-RF-03	<p>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).</p>

	[Removal Fill Condition 5]
GEN-RF-04	<p>The certificate holder shall:</p> <ol style="list-style-type: none"> 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. 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. 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. 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 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. 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. <p>[Removal Fill Condition 6]]</p>
STANDARD: FISH PASSAGE [OAR 635-412-0035]	
GEN-FP-01	<ol style="list-style-type: none"> 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 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

	<p>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.</p> <p>b. The certificate holder shall maintain compliance with the measures outlined in the final Fish Passage Plan approved by the Department in consultation with ODFW.</p> <p>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:</p> <ol style="list-style-type: none"> 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).
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	<ol style="list-style-type: none">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. <p>[Fish Passage Condition 1]</p>
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5.3 Pre-Construction Conditions

STANDARD: ORGANIZATIONAL EXPERTISE (OE) [OAR 345-022-0010]	
PRE-OE-01	<p>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.</p> <p>[Organizational Expertise Condition 3]</p>
PRE-OE-02	<p>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 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.</p> <p>[Organizational Expertise Condition 4]</p>
PRE-OE-03	<p>Prior to construction, the certificate holder shall:</p> <ol style="list-style-type: none"> 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 Power and Oregon Trail Electric Cooperation for the communication station distribution lines. Submit to the Department copies of all obtained third party permits, as identified in (a) of this condition. <p>[Organizational Expertise Condition 7]</p>
STANDARD: STRUCTURAL STANDARD (SS) [OAR 345-022-0020]	
PRE-SS-01	<p>At least 90 days prior to construction of a phase or segment of the facility:</p> <ol style="list-style-type: none"> 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-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. The certificate holder shall submit to the Department and DOGAMI a pre-construction site-specific geological and geotechnical investigation report

	<p>(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.</p> <ul style="list-style-type: none"> i. The report shall at a minimum include information derived from the geological and geotechnical investigations regarding: <ol style="list-style-type: none"> 1. Subsurface soil and geologic conditions within the site boundary; 2. 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. 5. 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 9. 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. <p>[Structural Standard Condition 1]</p>
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]	
PRE-RT-01	<p>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:</p> <ol style="list-style-type: none"> 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. 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. 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:

	<ul style="list-style-type: none"> 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. iv. Round the result total to the nearest \$1,000 to determine the inflation-adjusted 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. <p>[Retirement and Financial Assurance Condition 4]</p>
STANDARD: FISH AND WILDLIFE HABITAT (FW) [OAR 345-022-0060]	
PRE-FW-01	<p>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:</p> <ul style="list-style-type: none"> a. Northern Goshawk; b. American Three-Toed Woodpecker; c. Great Gray Owl; d. Flammulated Owl;

	<ul style="list-style-type: none"> e. Terrestrial Visual Encounter Surveys; f. Wetlands; and g. Fish Presence and Crossing Assessment Surveys. <p>[Fish and Wildlife Condition 15]</p>
PRE-FW-02	<p>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:</p> <ul style="list-style-type: none"> a. Washington ground squirrels; 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. <p>[Fish and Wildlife Condition 16]</p>
PRE-FW-03	<p>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.</p> <ul style="list-style-type: none"> 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 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. <ul style="list-style-type: none"> i. To the extent the certificate holder develops its own mitigation projects, the final Sage-Grouse Habitat Mitigation Plan shall: <ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> A. A baseline ecological assessment; B. Conservation actions to be implemented at the site; C. An implementation schedule for the baseline ecological assessment

	<p>and conservation actions;</p> <p>D. Performance measures and success criteria for mitigation actions;</p> <p>E. Adaptive management considerations for changes in habitat conditions or a results of catastrophic fire;</p> <p>F. Weed management plan;</p> <p>G. A reporting plan;</p> <p>H. A monitoring plan; and;</p> <p>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.</p> <p>ii. To the extent the site certificate utilizes a mitigation bank or in-lieu fee program, the final Sage-Grouse Habitat Mitigation Plan shall:</p> <ol style="list-style-type: none"> 1. Describe the nature, extent, and history of the mitigation bank or in-lieu 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. <p>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 as-constructed 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.</p> <p>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.</p> <p>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</p>
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	<p>provided to the Department prior to construction.</p> <p>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.</p> <p>[Fish and Wildlife Condition 17]</p>
PRE-FW-04	<p>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.</p> <p>[Fish and Wildlife Condition 21]</p>
STANDARD: PUBLIC SERVICES (PS) [OAR 345-022-0110]	
PRE-PS-01	<p>Prior to construction within Malheur County,</p> <p>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.</p> <p>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.</p> <p>[Public Services Condition 1]</p>
PRE-PS-02	<p>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:</p> <p>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;</p>

	<p>b. The final county-specific Transportation and Traffic Plan submitted to the Department, county, and jurisdiction shall include:</p> <ul style="list-style-type: none"> i. 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; <ul style="list-style-type: none"> 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. <p>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.</p> <p>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.</p> <p>[Public Services Condition 2]</p>
PRE-PS-03	<p>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.</p>

	[Public Services Condition 4]
PRE-PS-04	<p>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:</p> <ul style="list-style-type: none"> a. 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: <ul style="list-style-type: none"> i) Contact information for federal, state, and county emergency management 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. <p>[Public Services Condition 5]</p>
STANDARD: SITING STANDARDS FOR TRANSMISSION LINES (TL) [DIVISION 24]	
PRE-TL-01	<p>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, operations, and maintenance of the facilities. The certificate holder shall notify the Department how and when it briefed the Public Utility Commission staff.</p> <p>[Siting Standards for Transmission Lines Condition 4]</p>
STANDARD: REMOVAL FILL LAW (RF) [OAR 141-085-0500 through -0785]	
PRE-RF-01	<p>The certificate holder shall:</p> <ul style="list-style-type: none"> 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. <p>[Removal Fill Condition 1]</p>
PRE-RF-02	<p>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 Department.</p> <p>[Removal Fill Condition 4]</p>

5.4 Constructions Conditions

Condition Number	(Site certificate conditions for all standards and phases)
STANDARD: GENERAL STANDARD OF REVIEW (GS) [OAR 345-022-0000]	
CON-GS-01	<p>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.</p> <p>[General Standard of Review Condition 3]</p>
CON-GS-02	<p>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.</p> <p>[General Standard of Review Condition 7; Mandatory Condition OAR 345-025-0006(5)]</p>
STANDARD: LAND USE (LU) [OAR 345-022-0030]	
CON-LU-01	<p>During construction in Baker County, the certificate holder shall construct the facility to comply with the following setback distances and other requirements:</p> <p><u>In the EFU Zone (Based solely on certificate holder representations in the ASC):</u></p> <ol style="list-style-type: none"> Buildings shall be setback as follows: front yards shall be set back at least 20 feet from property lines and road rights-of-way. 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. Buildings and the fixed bases of transmission line towers shall be set back at least 10 feet from property lines. 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. <p>[Land Use Condition 10]</p>
CON-LU-02	<p>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.</p>

	[Land Use Condition 17]
STANDARD: FISH AND WILDLIFE HABITAT (FW) [OAR 345-022-0060]	
CON-FW-01	<p>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.</p> <p>[Fish and Wildlife Condition 11]</p>
CON-FW-02	<p>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:</p> <ol style="list-style-type: none"> Identification of the State Sensitive bat species observed; Location of pygmy rabbit colony or bat roost; and Any actions the certificate holder will take to avoid, minimize, or mitigate impacts to pygmy rabbit colony or bat roost. 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. <p>[Fish and Wildlife Condition 12]</p>
CON-FW-03	<p>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 the certificate holder identifies a native, non-raptor bird species nest, the certificate holder shall submit to the Department for its approval a notification addressing the following:</p> <ol style="list-style-type: none"> Identification of the native, non-raptor species observed; Location of the nest; and Any actions the certificate holder will take to avoid, minimize, or mitigate impacts to the nest. <p>[Fish and Wildlife Condition 13]</p>

CON-FW-04	<p>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.</p> <table><tr><th colspan="3">Raptor Nest Buffers</th></tr><tr><th>Nesting Species</th><th>Spatial Buffers (radius around nest site):</th><th>Temporal Restrictions</th></tr><tr><td>Bald eagle</td><td>0.5 mile</td><td>January 1 to August 15</td></tr><tr><td>Golden eagle</td><td>0.5 mile</td><td>February 1 to August 15</td></tr><tr><td>Ferruginous hawk</td><td>0.50 mile</td><td>March 15 to August 15</td></tr><tr><td>Flammulated owl</td><td>0.25 mile</td><td>March 1 to August 15</td></tr><tr><td>Great gray owl</td><td>0.25 mile</td><td>March 1 to August 15</td></tr><tr><td>Northern goshawk</td><td>0.5 mile</td><td>May 1 to August 15</td></tr><tr><td>Peregrine falcon</td><td>0.25 mile</td><td>January 1 to July 1</td></tr><tr><td>Prairie falcon</td><td>0.25 mile</td><td>March 15 to July 1</td></tr><tr><td>Red-tailed hawk</td><td>300 to 500 feet</td><td>March 1 to August 15</td></tr><tr><td>Swainson’s hawk</td><td>0.25 mile</td><td>April 1 to August 15</td></tr><tr><td>Western burrowing owl</td><td>0.25 mile</td><td>April 1 to August 15</td></tr></table> <p>[Fish and Wildlife Condition 14]</p>	Raptor Nest Buffers			Nesting Species	Spatial Buffers (radius around nest site):	Temporal 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
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CON-FW-05	<p>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.</p> <p>[Fish and Wildlife Condition 18]</p>																																							
CON-FW-06	<p>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.</p> <p>[Fish and Wildlife Condition 20]</p>																																							
STANDARD: THREATENED AND ENDANGERED SPECIES (TE) [OAR 345-022-0070]																																								
CON-TE-01	<p>During construction, the certificate holder shall not conduct ground-disturbing activities within Category 1 Washington ground squirrel (WAGS) habitat, subject to the following:</p> <p>a. The identification and categorization of WAGS habitat shall be based on the</p>																																							

	<p>surveys referenced in Fish and Wildlife Condition 16 and the results of the surveys shall apply for up to three years.</p> <p>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.</p> <p>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:</p> <ol style="list-style-type: none"> Location of the burrow or colony; and Any actions the certificate holder will take to avoid, minimize, or mitigate impacts to the colony. <p>[Threatened and Endangered Species Condition 1]</p>
CON-TE-02	<p>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:</p> <ol style="list-style-type: none"> 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 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. <p>[Threatened and Endangered Species Condition 2]</p>
STANDARD: NOISE CONTROL REGULATIONS (NC) [OAR 340-035-0035]	
CON-NC-01	<p>During construction, the certificate holder shall implement the following design measures and construction techniques to minimize potential corona noise during operations:</p> <ol style="list-style-type: none"> For 500 kV transmission lines, use a triple bundled conductor configuration. Maintain tension on all insulator assemblies to ensure positive contact between insulators. Protect conductor surface to minimize scratching or nicking. <p>[Noise Control Condition 3]</p>

5.5 Operational Conditions

Condition Number	(Site certificate conditions for all standards and phases)
STANDARD: GENERAL STANDARD OF REVIEW (GS) [OAR 345-022-0000]	
OPR-GS-01	<p>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.</p> <p>[General Standard of Review Condition 4]</p>
OPR-GS-02	<p>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.</p> <p>[General Standard of Review Condition 5; Mandatory Condition OAR 345-025-0006(2)]</p>
OPR-GS-03	<p>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).</p> <p>[General Standard of Review Condition 9; Mandatory Condition OAR 345-025-0006(11)]</p>
STANDARD: ORGANIZATIONAL EXPERTISE (OE) [OAR 345-022-0010]	
OPR-OE-01	<p>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:</p>

	<ul style="list-style-type: none"> 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. <p>[Organizational Expertise Condition 1]</p>
STANDARD: SOIL PROTECTION (SP) [OAR 345-022-0022]	
OPR-SP-01	<p>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.</p> <p>[Soil Protection Condition 5]</p>
STANDARD: RETIREMENT AND FINANCIAL ASSURANCE (RT) [OAR 345-022-0050]	
OPR-RT-01	<p>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:</p> <ul style="list-style-type: none"> 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 3rd 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. b. 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 50th 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 100th 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 (3rd 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 inflation-adjusted estimated total decommissioning cost.
- f. The certificate holder shall use an issuer of the bond or letter of credit approved by the Council.

	<p>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.</p> <p>[Retirement and Financial Assurance Condition 5]</p>
STANDARD: FISH AND WILDLIFE HABITAT (FW) [OAR 345-022-0060]	
OPR-FW-01	<p>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.</p> <ol style="list-style-type: none"> The final calculations shall be based on the as-constructed facility. 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. <p>[Fish and Wildlife Condition 5]</p>
OPR-FW-02	<p>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.</p> <p>[Fish and Wildlife Condition 9]</p>
OPR-FW-03	<p>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.</p> <ol style="list-style-type: none"> The final calculations shall be based on the as-constructed facility. 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. <p>[Fish and Wildlife Condition 19]</p>
OPR-FW-04	<p>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).</p>

	[Fish and Wildlife Condition 22]
STANDARD: HISTORIC, CULTURAL, AND ARCHEOLOGICAL RESOURCES (HC) [OAR 345-022-0090]	
OPS-HC-01	<p>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.</p> <ol style="list-style-type: none"> 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 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. <p>[Historic, Cultural and Archeological Resources Condition 3]</p>
STANDARD: SITING STANDARDS FOR TRANSMISSION LINES (TL) [DIVISION 24]	
OPR-TL-01	<p>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:</p> <ol style="list-style-type: none"> 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. Implement a safety protocol to ensure adherence to National Electric Safety Code grounding requirements. <p>[Siting Standards for Transmission Lines Condition 2]</p>
OPR-TL-02	<p>During operation, the certificate holder shall:</p> <ol style="list-style-type: none"> 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. File information with the Commission before January 2 of each even-numbered year, as required by ORS 758.013: <ol style="list-style-type: none"> 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 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. 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. Provide Public Utility Commission Safety Staff with: <ol style="list-style-type: none"> Maps and drawings of routes and installation of electrical supply lines showing:

	<ul style="list-style-type: none"> 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. <p>[Siting Standards for Transmission Lines Condition 5]</p>
STANDARD: NOISE CONTROL REGULATIONS (NC) [OAR 340-035-0035]	
OPR-NC-01	<p>During operation:</p> <ul style="list-style-type: none"> 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). 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)] <p>[Noise Control Condition 4]</p>
OPR-NC-02	<p>During operation:</p> <ul style="list-style-type: none"> 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). 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. [OAR 340-035-0100] <p>[Noise Control Condition 5]</p>

5.6 Retirement Conditions

STANDARD: RETIREMENT AND FINANCIAL ASSURANCE (RT) [OAR 345-022-0050]	
RET-RT-01	<p>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.</p> <p>[Retirement and Financial Assurance Condition 2; Mandatory Condition OAR 345-025-0006(9)]</p>
RET-RT-02	<p>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.</p> <p>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.</p> <p>[[Retirement and Financial Assurance Condition 3; Mandatory Condition OAR 345-025-0006(16)]</p>

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

By: _____

Kent Howe, Vice Chair

Date: _____

Idaho Power Company

By: _____

Authorized Representative

Date: _____

By: _____

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 County									139.1
<i>Little Juniper Canyon Alternative</i>									78.7
90	Ritzville	5	0.49	19	5	N	N	38	78.7
<i>Other Access Roads</i>									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 County									71.3
<i>Other Access Roads</i>									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
Union County									36.7
<i>Other Access Roads</i>									36.7
84	Hall Ranch	7	0.37	24	3	Y	Y	41	18.4
141	Gwinly	8	0.37	24	1	Y	Y	38	1.3
143	La Grande	6	0.28	1	5	N	N	NA	3.4
163	Ruckles	8	0.332791	7	1	Y	Y	41	13.5
Baker County									564.9
<i>True Blue Gulch Alternative</i>									339.4
262	Ateron	8	0.43	7	1	Y	Y	43	339.4
<i>Durbin Quarry Alternative</i>									130.0
486	Snaker	8	0.32	40	1	Y	Y	41	11.5
528	Ruckles	8	0.332791	7	1	Y	Y	41	84.2
540	Hyall	8	0.32	48	5	Y	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 Access Roads									95.5
199	Ateron	8	0.43	7	1	Y	Y	43	7.9
202	Ateron	8	0.43	7	1	Y	Y	43	3.0
431	Coughanour	6	0.37	5	3			NA	3.6
436	Ateron	8	0.43	7	1	Y	Y	43	2.0
437	Hyll	8	0.32	48	5	Y	Y	74	2.6
445	Hyll	8	0.32	48	5	Y	Y	74	15.4
447	Durkee	7	0.28	7	2	Y	Y	43	1.6
474	Ruckles	8	0.332791	7	1	Y	Y	41	1.6
486	Snaker	8	0.32	40	1	Y	Y	41	39.0
487	Hyll	8	0.32	48	5	Y	Y	74	2.4
540	Hyll	8	0.32	48	5	Y	Y	74	16.3
Malheur County									139.1
Other Access Roads									139.1
213	Poall	3	0.43	7	3		Y	4	1.5
220	Chilcott	5	0.49	4	2			NA	27.8
233	Ruckles	8	0.332791	7	1	Y	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	Y	Y	30	7.9
540	Hyll	8	0.32	48	5	Y	Y	74	7.2
647	Shoofly	6	0.333333	2	1	Y		35	28.2
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

Applicable Protected Area Category (OAR 345-001-0010[49] subsection) ¹	Land Management Agency Contact Information	Protected Area Resource within the Updated Analysis Area ² (Pale green indicates new resource)	State - County	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) ³ (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Construction Noise Impact Level ⁴	Traffic Impact	Visual Impact Intensity Level	Map Sheet Reference
Wilderness Areas (c)	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 A-weighted 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 ⁵	1,2
	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 ⁵	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 ⁵	1,2
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	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 ⁵	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 (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 ⁵	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 ⁵	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) ¹	Land Management Agency Contact Information	Protected Area Resource within the Updated Analysis Area ² (Pale green indicates new resource)	State - County	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) ³ (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Construction Noise Impact Level ⁴	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 ⁵	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 ⁵	1,2
National Wildlife Refuges (e)	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
	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 ⁶	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
Federal Land Management Plan Designated Lands (i)	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 ⁵	2,3
	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 ⁵	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 ⁵	3

Applicable Protected Area Category (OAR 345-001-0010[49] subsection) ¹	Land Management Agency Contact Information	Protected Area Resource within the Updated Analysis Area ² (Pale green indicates new resource)	State - County	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) ³ (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Construction Noise Impact Level ⁴	Traffic Impact	Visual Impact Intensity Level	Map Sheet Reference
	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 ⁵	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 ⁵	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)	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 at least 10 miles from the updated site boundary, access roads, and multi-use areas. No or negligible impacts during operation.	Not Analyzed ⁵	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 ⁷ (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 ⁶	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 ⁵	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 ⁵	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 ⁵	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 ⁷ (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 ⁵	3

Applicable Protected Area Category (OAR 345-001-0010[49] subsection) ¹	Land Management Agency Contact Information	Protected Area Resource within the Updated Analysis Area ² (Pale green indicates new resource)	State - County	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) ³ (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Construction Noise Impact Level ⁴	Traffic Impact	Visual Impact Intensity Level	Map Sheet Reference
	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 ⁵	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, multi-use 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 ⁵	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 ⁶	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)	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.	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 ⁸	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 ⁶	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 ⁷ (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 ⁵	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 ⁵	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 ⁶	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 ⁶	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 ⁵	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 ⁹	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 ⁵	1,2

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State Parks, Waysides, Corridors, Monuments, Historic, and Recreation Areas (j)	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	OR - Umatilla	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 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 Battle Mountain from I-84. No or negligible impacts during operation.	Not Analyzed ⁶	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
	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 ⁶	1,2
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 park.info@oregon.gov	Emigrant Springs State Heritage Area	OR - Umatilla	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)	OR - Baker	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	OR - Union	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 ⁶	3

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	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 ⁵	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 multi-use 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 ⁵	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 ⁵	2
State Natural Areas (I)	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	1
	The Nature Conservancy 821 SE 14th Avenue Portland, OR 97214 (503) 802-8100 oregon@tnc.org	Sumpter Valley 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 ⁵	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 multi-use 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. ¹⁰ No or negligible impacts during operation.	Medium	1,2

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State Wildlife Refuge or Management Areas (o)	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Columbia Basin - Coyote Springs Wildlife 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 multi-use 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 ⁶	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 ⁵	1
	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 ⁶	2
	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 ⁵	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 ⁶	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 ⁵	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) ¹	Land Management Agency Contact Information	Protected Area Resource within the Updated Analysis Area ² (Pale green indicates new resource)	State - County	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) ³ (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Construction Noise Impact Level ⁴	Traffic Impact	Visual Impact Intensity Level	Map Sheet Reference
	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Rogers Wildlife Area	OR - Malheur	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 multi-use areas (MA-07 and MA-08). No or negligible traffic impacts operation.	Not Analyzed ⁶	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 ⁸	3
State Fish Hatcheries (p)	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 ⁶	1
	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 multi-use area MO-01. No or negligible impacts during operation.	Not Analyzed ⁶	1
Agricultural Experiment Station, Experimental Area, or Research Center (q)	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 ⁹	1,2
	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 ⁵	1,2
	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.	Less than significant, temporary traffic impacts 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 ⁵	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 ⁵	3

Applicable Protected Area Category (OAR 345-001-0010[49] subsection) ¹	Land Management Agency Contact Information	Protected Area Resource within the Updated Analysis Area ² (Pale green indicates new resource)	State - County	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis) ³ (Orange indicates previously identified resource that decreased in proximity from the approved Project)	Construction Noise Impact Level ⁴	Traffic Impact	Visual Impact Intensity Level	Map Sheet Reference
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¹ 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.

² 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.

³ 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.

⁴ 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.

⁵ 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.

⁶ 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.

⁷ 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.

⁸ Resource is completely outside of the modeled bare earth viewshed so there will be no visual impacts to the resource.

⁹ 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.

¹⁰ Information on access obtained through a personal communication between Kristen Gulick, Tetra Tech and Kelly Wallis, The Nature Conservancy, July 18, 2022.

¹¹ 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

Protected Area by Jurisdiction (Map ID) ¹ <small>(Pale green indicates new resource)</small>	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	PART 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination			
			Scenic Quality / Scenic Attractiveness Class	Landscape Character ²	Observer Characteristics (Geometry / Exposure) ³	Impact Duration ⁴	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁵	Contribution of the Project to Impacts ⁶	Significance Determination
National Wild, Scenic, and Recreational Rivers and State Scenic Waterways													
Five Points Creek (Wild)	2.4 mi S (no decrease from approved Project)	1,2	A	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	B	Nat App	T; S	LT	Med	Low	Low	Med	NP	CE	Less than Significant
National Wildlife Refuges													
Deer Flat NWR	0.6 mi SW (no decrease from approved Project)	3	B	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	C	Cult	T; S	LT	Med	Med	Low	Med	NP	CE	Less than Significant

Protected Area by Jurisdiction (Map ID) ¹ <small>(Pale green indicates new resource)</small>	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	PART 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination			
			Scenic Quality / Scenic Attractiveness Class	Landscape Character ²	Observer Characteristics (Geometry / Exposure) ³	Impact Duration ⁴	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁵	Contribution of the Project to Impacts ⁶	Significance Determination
Federal Land Management Plan Designated Lands													
Oregon Trail ACEC - Birch Creek parcel	0.3 mi E (no decrease from approved Project)	3	C	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	B	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	B	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	C	Cult	T	LT	Med	Med	Med	Med	NP	CE	Less than Significant

Protected Area by Jurisdiction (Map ID) ¹ (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	PART 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination			
			Scenic Quality / Scenic Attractiveness Class	Landscape Character ²	Observer Characteristics (Geometry / Exposure) ³	Impact Duration ⁴	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁵	Contribution of the Project to Impacts ⁶	Significance Determination
Oregon Trail ACEC - Straw Ranch 1 Parcel	0.1 mi E (no decrease from approved Project)	2	C	Cult	T	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	C	Nat App	T	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	C	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	A	Nat App	T; S	LT	Med	Med	Low	Med	NP	CE	Less than Significant

Protected Area by Jurisdiction (Map ID) ¹ (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	PART 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination			
			Scenic Quality / Scenic Attractiveness Class	Landscape Character ²	Observer Characteristics (Geometry / Exposure) ³	Impact Duration ⁴	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁵	Contribution of the Project to Impacts ⁶	Significance Determination
Powder River Canyon ACEC	8.8 mi SW (no decrease from approved Project)	2	B	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	C	Nat App	T	LT	Low	Low	Low	Low	NA	PE	Less than Significant
Boardman RNA	2.0 mi S	1	C	Nat App	T; S	LT	Med	Med	Med	Med	NP	CE	Less than Significant
State Parks, Waysides, Corridors, Monuments, Historic, and Recreation Areas													
Blue Mountain Forest State Scenic Corridor	Crosses (no decrease from approved Project)	1,2	B	Nat App	T	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	B	Cult	T; S	LT	Low	Low	Low	Low	NA	PE	Less than Significant

Protected Area by Jurisdiction (Map ID) ¹ (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	PART 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination			
			Scenic Quality / Scenic Attractiveness Class	Landscape Character ²	Observer Characteristics (Geometry / Exposure) ³	Impact Duration ⁴	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁵	Contribution of the Project to Impacts ⁶	Significance Determination
Farewell Bend SRA	0.4 mi W (0.3 mi decrease from approved Project)	3	B	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	A	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	B	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	A	Nat App	T; S	LT	Low	Low	Low	Low	NA	PE	Less than Significant
State Natural Areas													

Protected Area by Jurisdiction (Map ID) ¹ (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	PART 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination			
			Scenic Quality / Scenic Attractiveness Class	Landscape Character ²	Observer Characteristics (Geometry / Exposure) ³	Impact Duration ⁴	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁵	Contribution of the Project to Impacts ⁶	Significance Determination
Lindsay Prairie Preserve/SNHA	1.3 mi E (0.3 mi decrease from approved Project)	1	C	Cult	T	LT	Med	Med	Low	Med	NP	CE	Less than Significant
Glass Hill Preserve/SNHA	1.6 mi W	1,2	C	Ag	T; S	LT	Med	Med	Med	Med	NP	CE	Less than Significant
State Wildlife Refuge or Management Areas													
Columbia Basin – Coyote Springs Wildlife Area	12.2 mi S (no decrease from approved Project)	1	C	Urb	S	LT	High	Low	High	Low	NA	CE	Less than Significant

Protected Area by Jurisdiction (Map ID) ¹ (Pale green indicates new resource)	Location of Protected Area Relative to the RFA 1 Alterations (change relative to ASC analysis)	Map Sheet Reference	PART 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination			
			Scenic Quality / Scenic Attractiveness Class	Landscape Character ²	Observer Characteristics (Geometry / Exposure) ³	Impact Duration ⁴	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁵	Contribution of the Project to Impacts ⁶	Significance Determination
Ladd Marsh Wildlife Area/SNHA	4.5 mi NW (no decrease from approved Project)	1,2	C	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.

¹ 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.

² Landscape Character Type: Nat App = Naturally Appearing; Cult = Cultural; Hist = Historical; Urb = Urban; Ag = Agricultural

³ Observer Characteristics: T= Transient; S = Stationary

⁴ Duration: LT = Long-term; ST= Short-term

⁵ Context: NP = Not Precluded; P = Precluded; NA = Not Analyzed; low intensity impact

⁶ 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)**

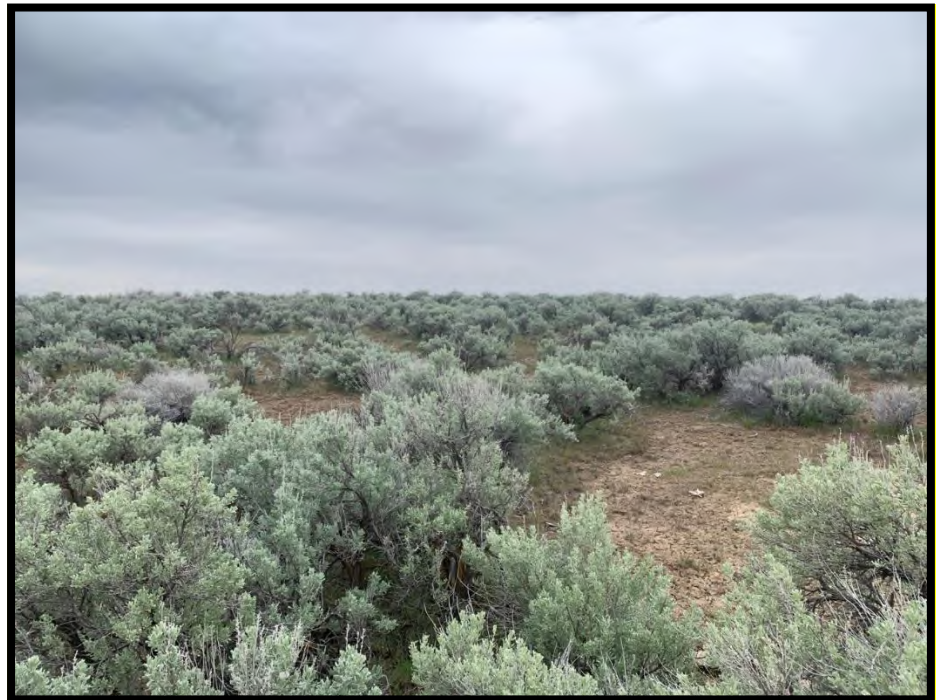
Attachment 7-4. Pygmy Rabbit Survey Report



TETRA TECH

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:



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**Tetra Tech Project No. 106-4422
4728RPT**

August 2022

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Figure 1. 2022 Pygmy Rabbit Survey Results

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Appendix A. Pygmy Rabbit Identification Guides
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Appendix C. 2022 Select Pygmy Rabbit Habitat Photos

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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 tridentata*) 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.

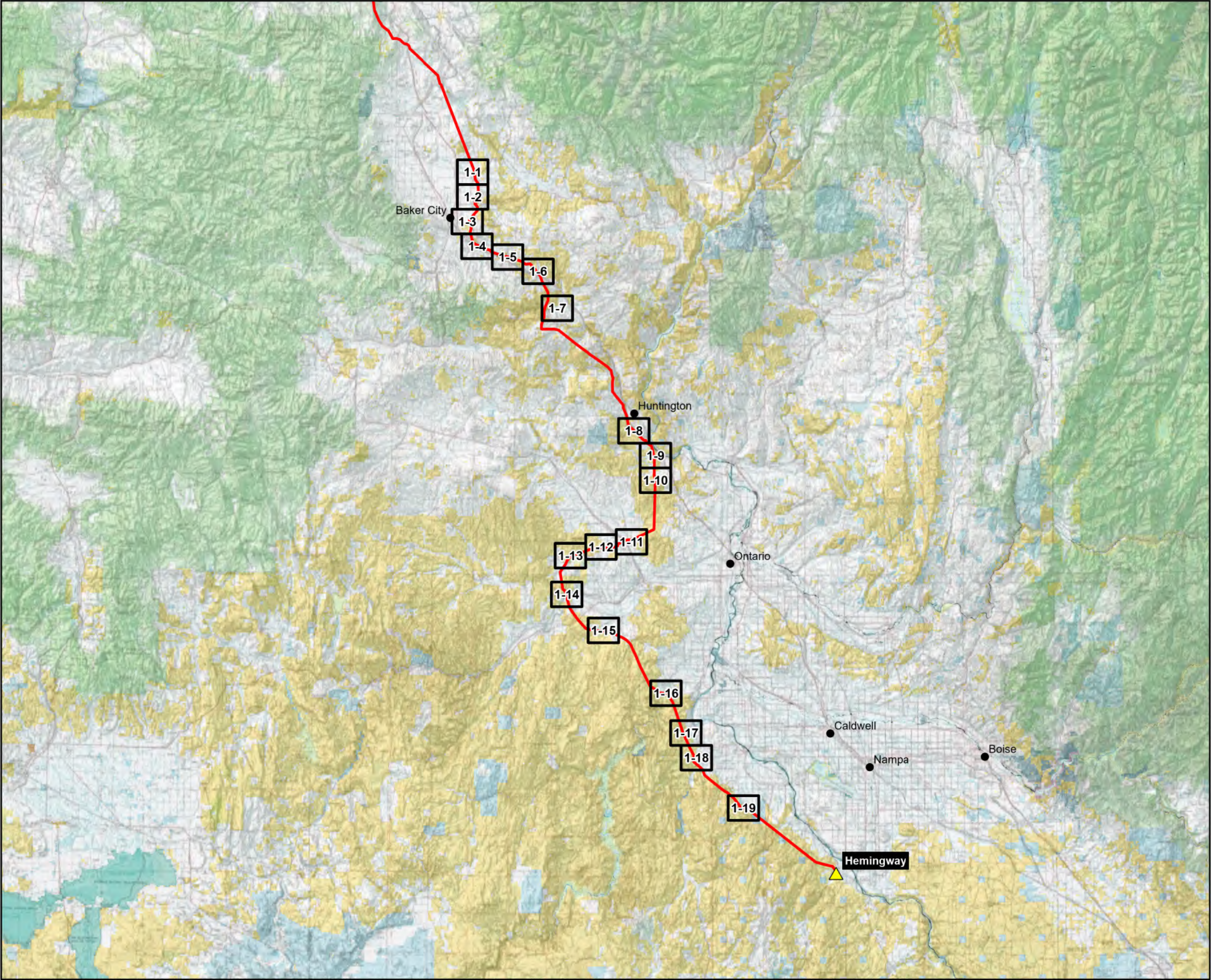
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FIGURES

Boardman to Hemingway
Transmission Project

Figure 1
2022 Pygmy Rabbit
Survey Results



- Pygmy Rabbit Survey Area**
- Index Map
 - Project Features (March 21, 2022)
 - Substation
- Land Status**
- Bureau of Land Management
 - Bureau of Reclamation
 - Fish and Wildlife Service
 - Forest Service
 - Indian Reservation
 - Military Reservation or Corps of Engineers
 - Other Federal
 - Private
 - State or Local
 - State or Local Parks and Recreation or Wildlife

Note:

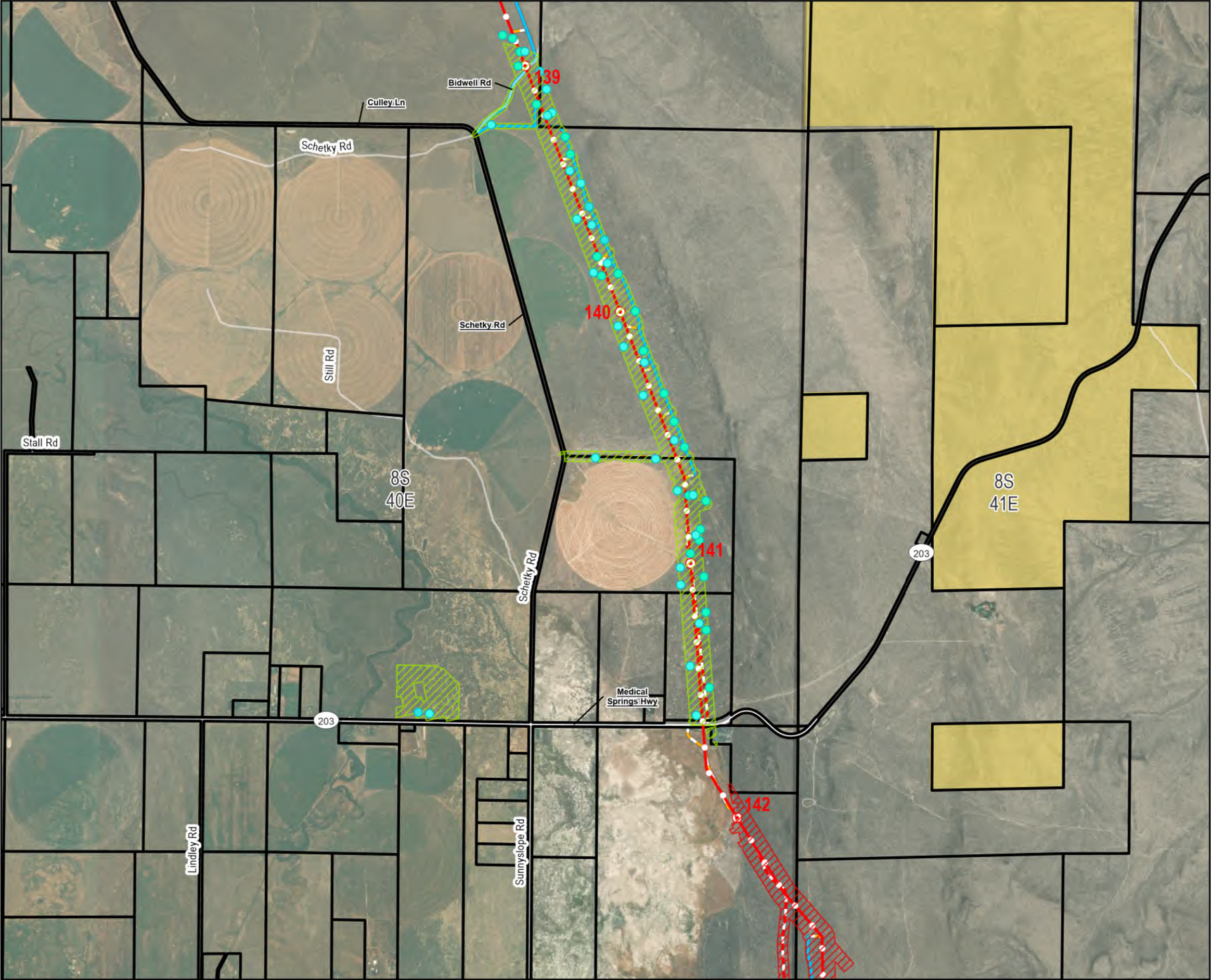
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-1
2022 Pygmy Rabbit
Survey Results
Baker County

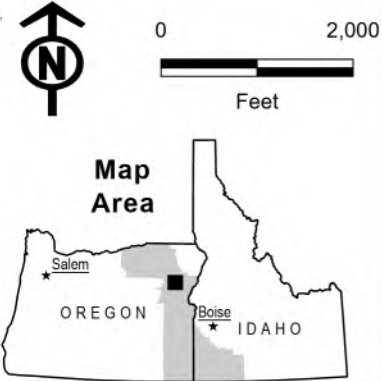


- Pygmy Rabbit Survey Area**
- Survey Complete
 - Survey Not Complete
- Level of Pygmy Rabbit Habitat**
- Habitat
 - Poor Habitat
 - Not Habitat
 - Parcel Boundary
- Project Features (March 21, 2022)**
- Mile
 - Tenth-Mile
 - Route
- Access**
- Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - New Road, Bladed
 - New Road, Primitive
- Land Status**
- Bureau of Land Management
 - Private

Note:

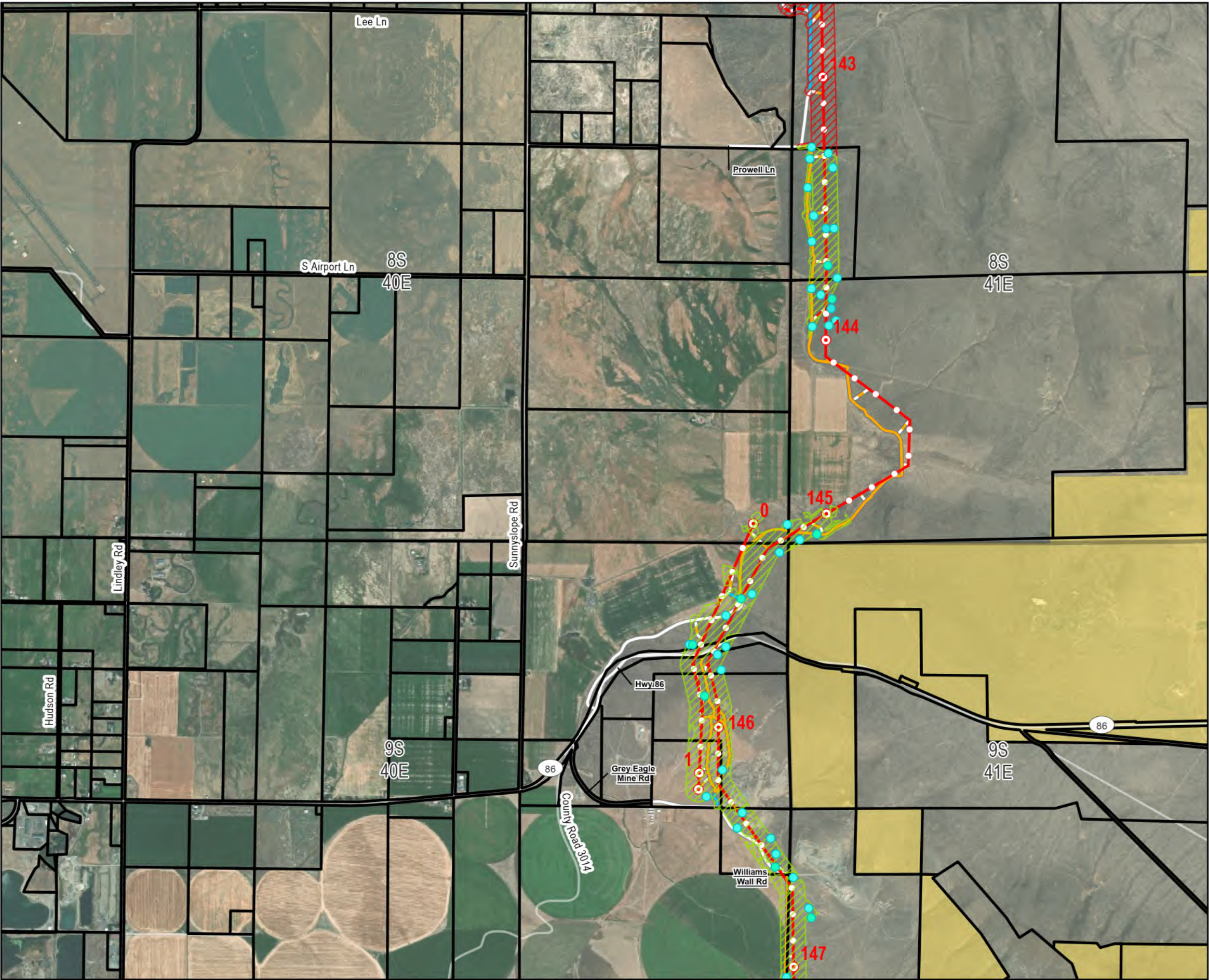
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-2
2022 Pygmy Rabbit
Survey Results
Baker County

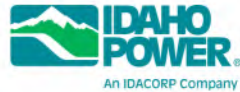


- Pygmy Rabbit Survey Area**
- Survey Complete
 - Survey Not Complete
- Level of Pygmy Rabbit Habitat**
- Habitat
 - Poor Habitat
 - Not Habitat
- Parcel Boundary**
- Project Features (March 21, 2022)**
- Mile
 - Tenth-Mile
 - Route
- Access**
- Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
 - New Road, Primitive
- Land Status**
- Bureau of Land Management
 - Private

Note:

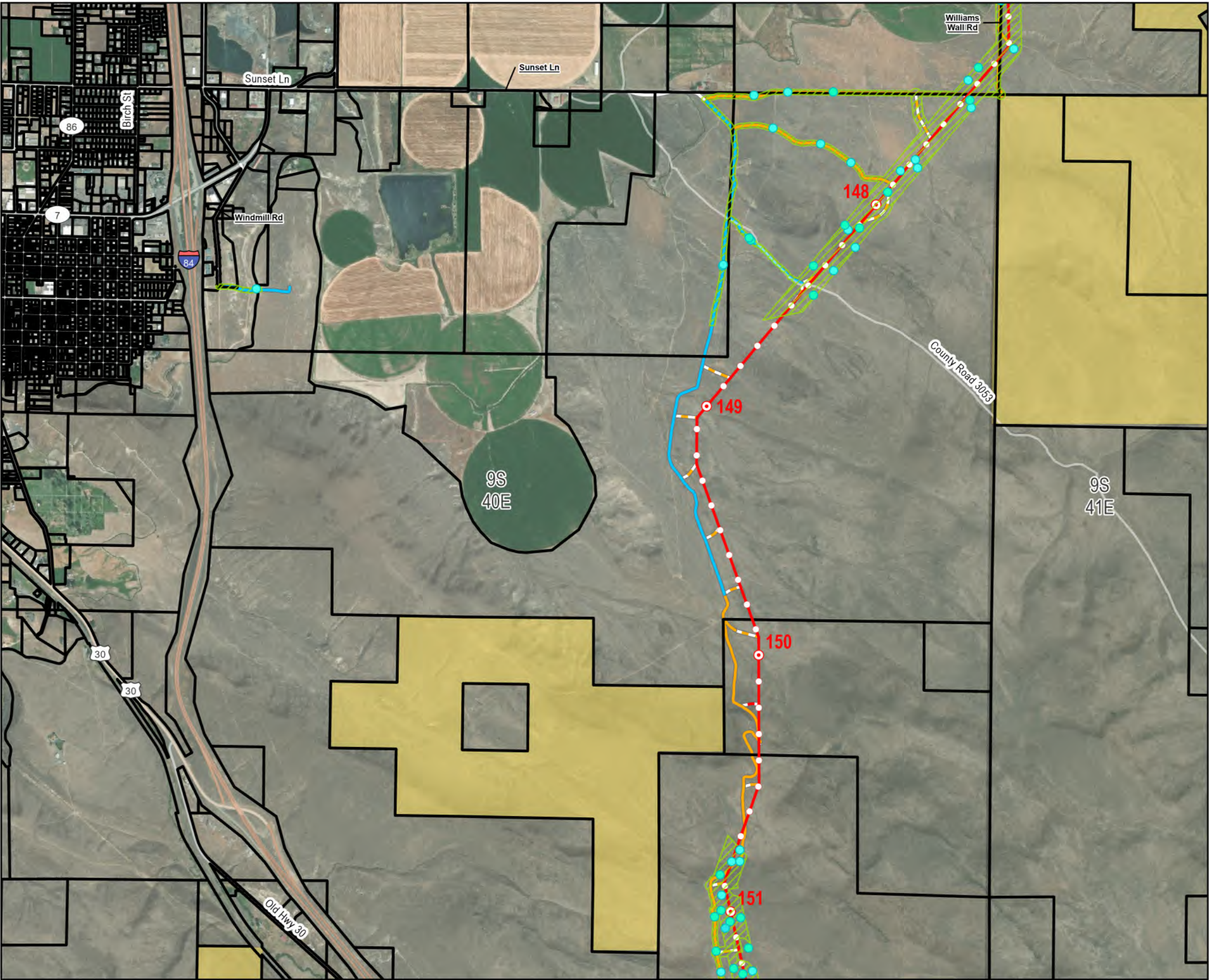
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-3
2022 Pygmy Rabbit
Survey Results
Baker County



- Pygmy Rabbit Survey Area**
- Survey Complete
 - Level of Pygmy Rabbit Habitat
 - Habitat
 - Poor Habitat
 - Not Habitat
 - Parcel Boundary
- Project Features (March 21, 2022)**
- Mile
 - Tenth-Mile
 - Route
 - Access
 - Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
 - New Road, Primitive
 - Land Status
 - Bureau of Land Management
 - Private

Note:

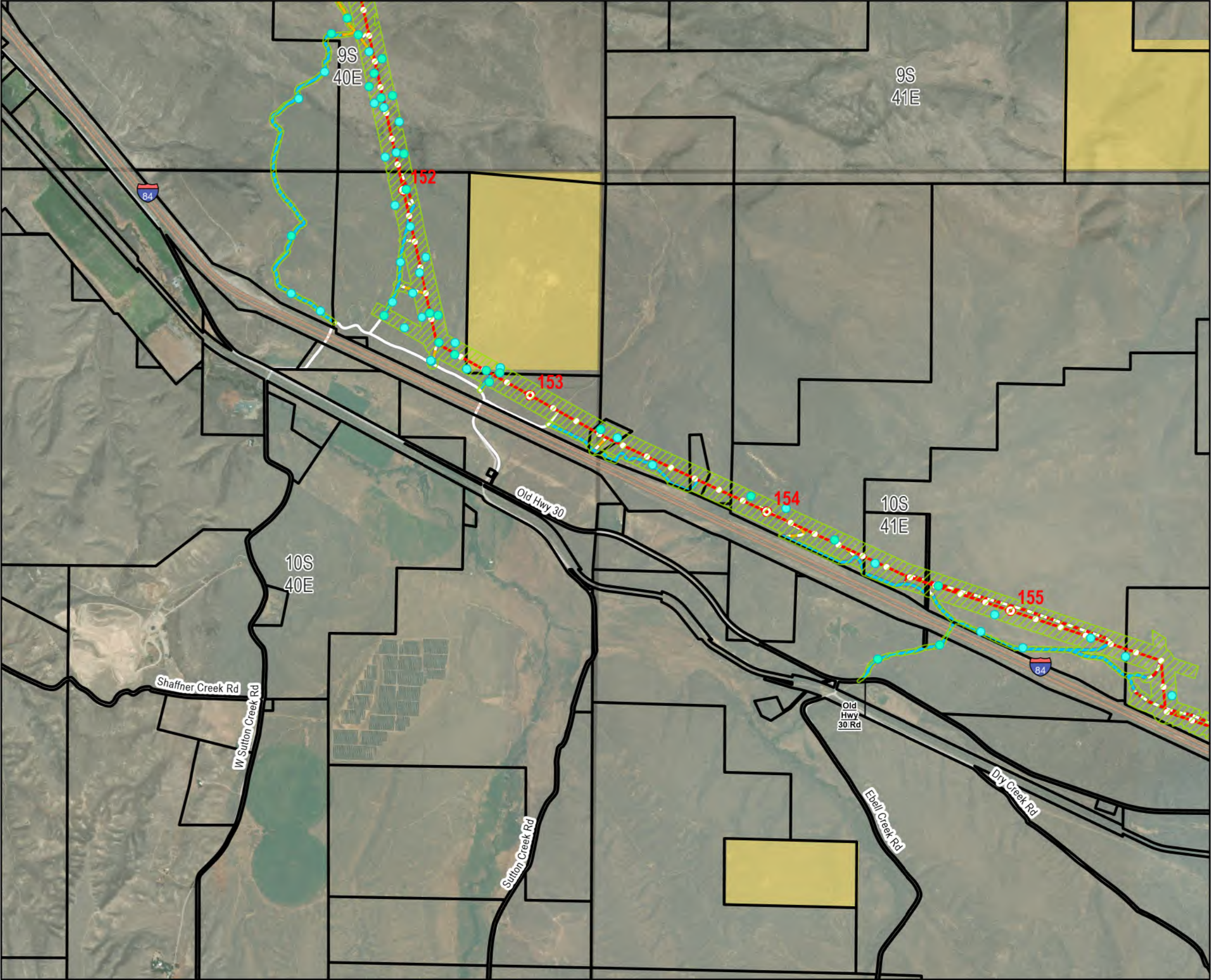
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-4
2022 Pygmy Rabbit
Survey Results
Baker County



- Pygmy Rabbit Survey Area**
- Survey Complete
 - Level of Pygmy Rabbit Habitat
 - Habitat
 - Poor Habitat
 - Parcel Boundary
- Project Features (March 21, 2022)**
- Mile
 - Tenth-Mile
 - Route
 - Access
 - Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
 - New Road, Primitive
 - Land Status
 - Bureau of Land Management
 - Private

Note:

Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed

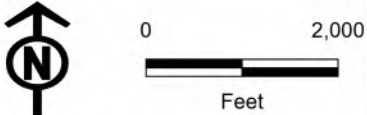
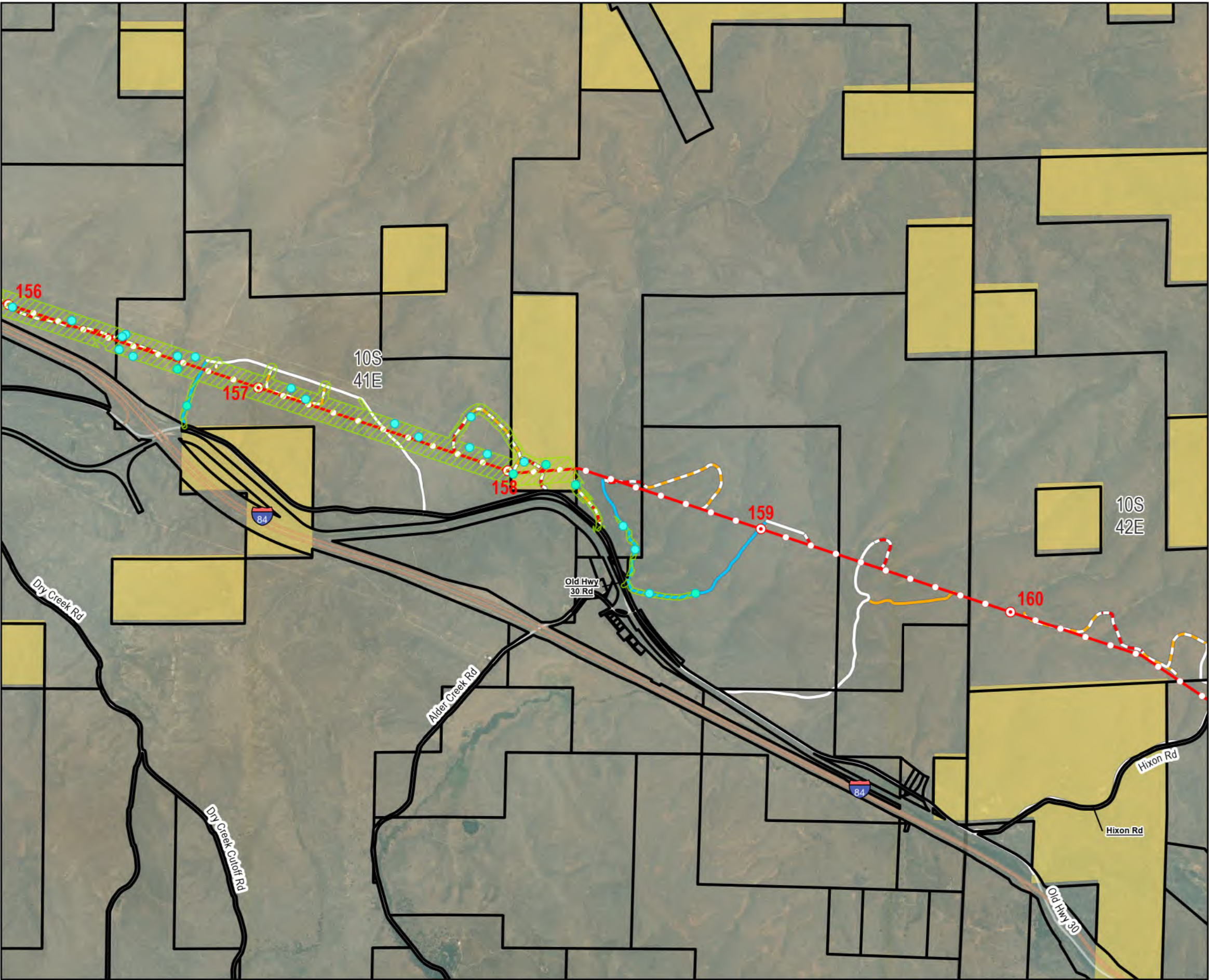


Figure 1-5
2022 Pygmy Rabbit
Survey Results
Baker County

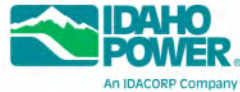


- Pygmy Rabbit Survey Area**
- Survey Complete
 - Level of Pygmy Rabbit Habitat
 - Habitat
 - Poor Habitat
 - Parcel Boundary
- Project Features (March 21, 2022)**
- Mile
 - Tenth-Mile
 - Route
 - Access
 - Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
 - New Road, Primitive
 - Land Status
 - Bureau of Land Management
 - Private

Note:

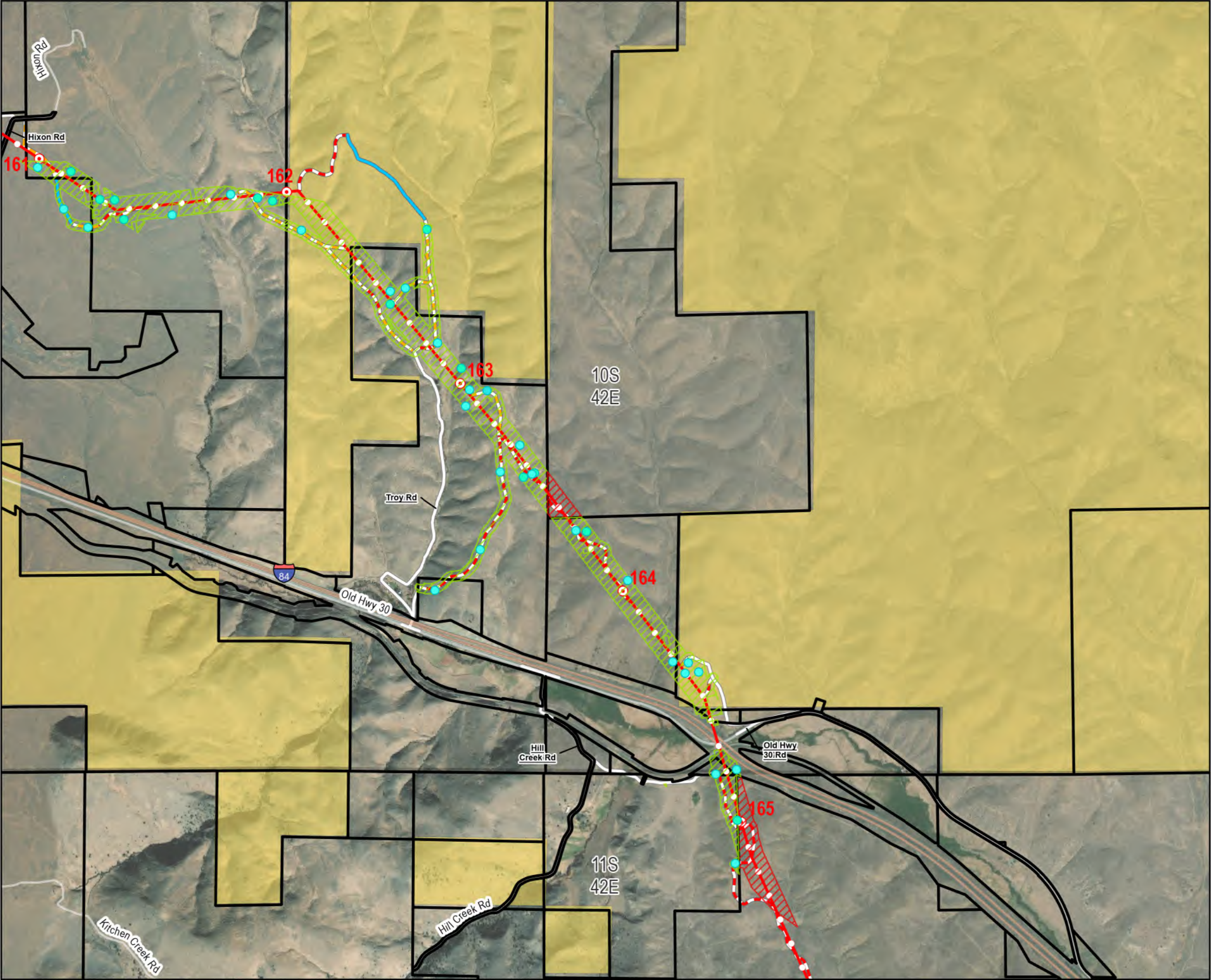
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-6
2022 Pygmy Rabbit
Survey Results
Baker County



Pygmy Rabbit Survey Area

- Survey Complete
- Survey Not Complete
- Level of Pygmy Rabbit Habitat
 - Habitat
 - Poor Habitat
 - Not Habitat
- Parcel Boundary

Project Features (March 21, 2022)

- Mile
- Tenth-Mile
- Route
- Access
 - Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - New Road, Bladed
 - New Road, Primitive
- Land Status
 - Bureau of Land Management
 - Private

Note:

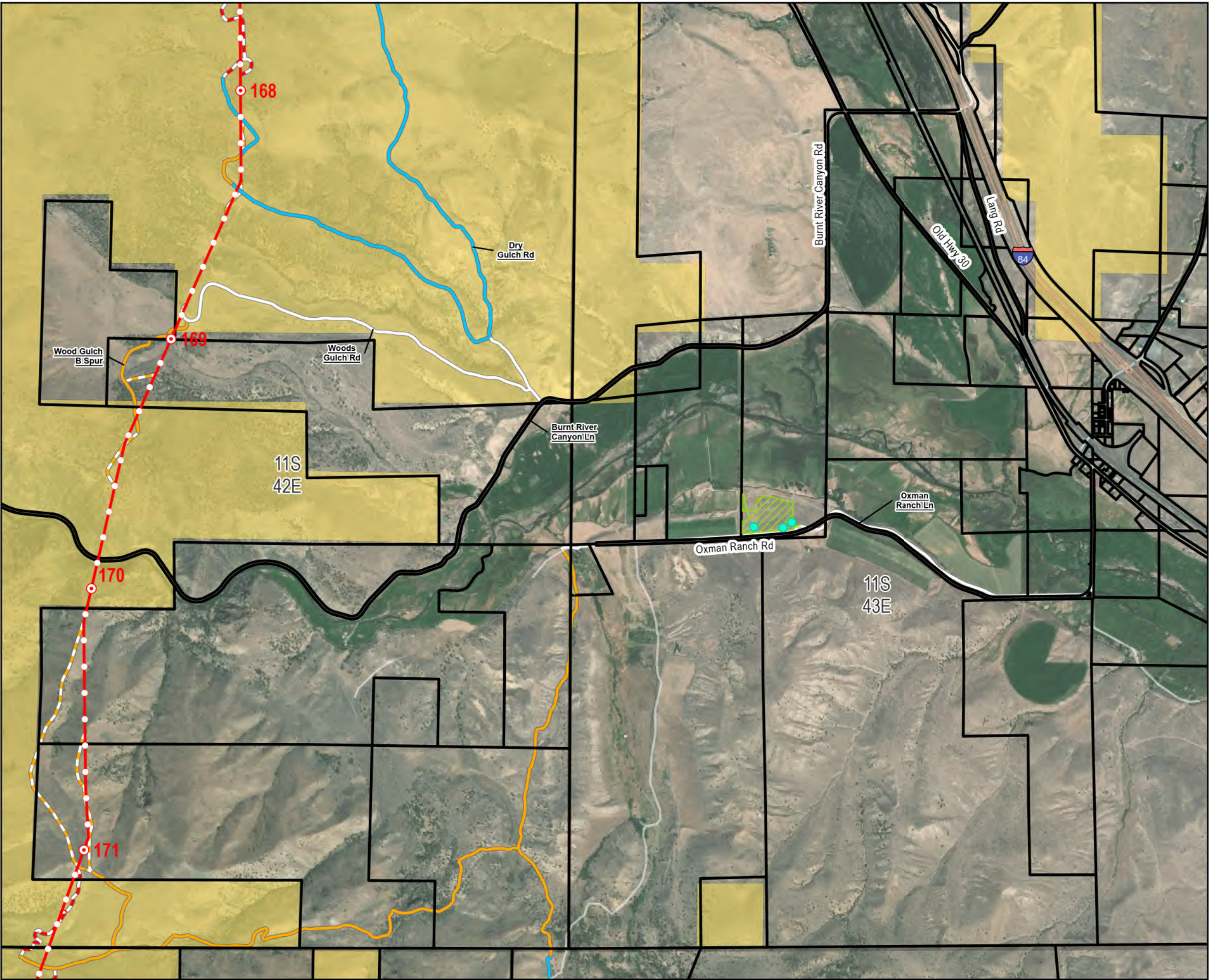
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-7
2022 Pygmy Rabbit
Survey Results
Baker County



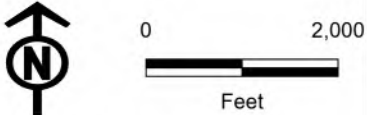
Pygmy Rabbit Survey Area
Survey Complete
Level of Pygmy Rabbit Habitat
Habitat
Parcel Boundary

Project Features (March 21, 2022)
Mile
Tenth-Mile
Route
Access
Existing Road, No Substantial Modification, 0-20% Improvements
Existing Road, Substantial Modification, 21-70% Improvements
Existing Road, Substantial Modification, 71-100% Improvements
New Road, Bladed
New Road, Primitive
Land Status
Bureau of Land Management
Private

Note:

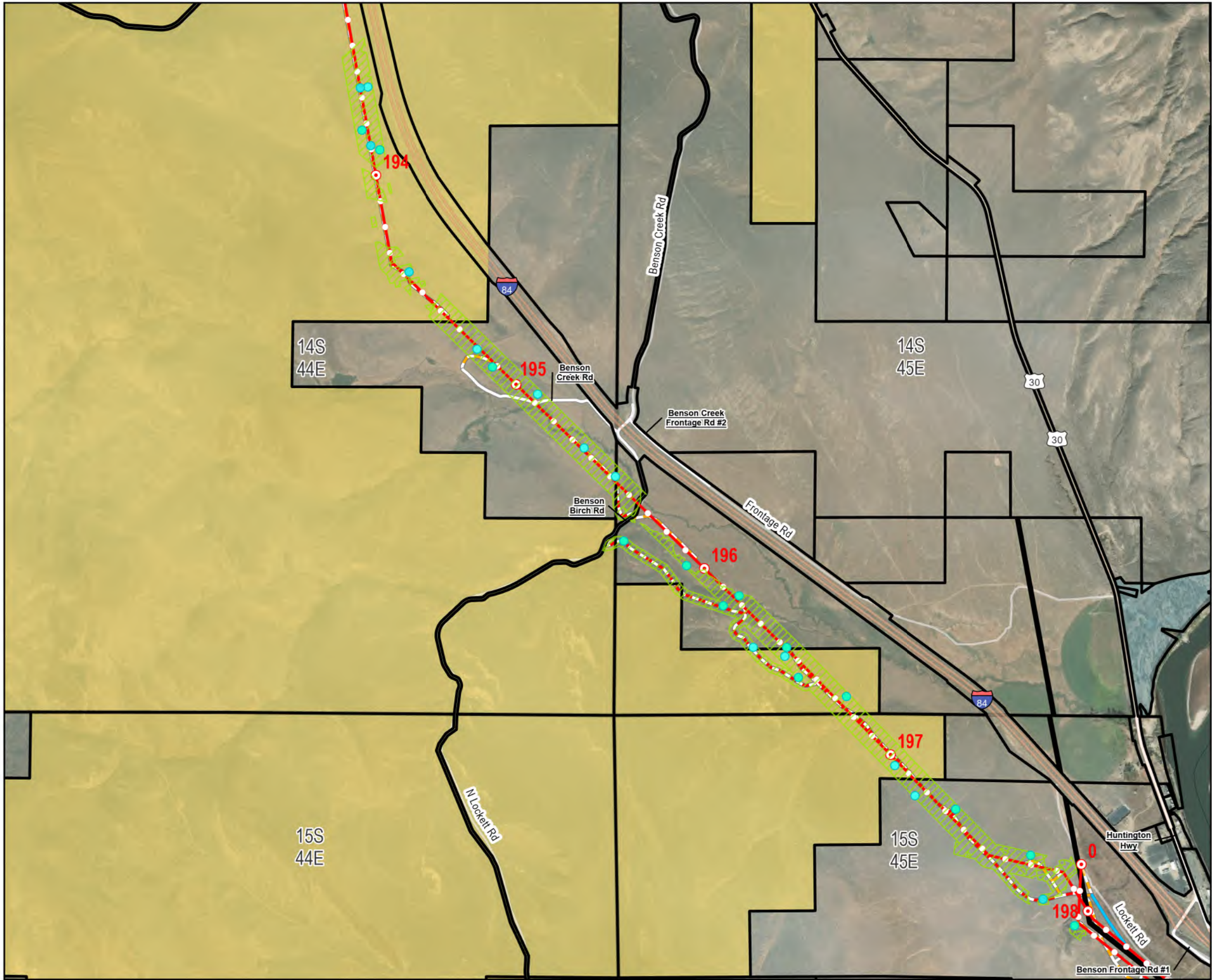
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon), Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-8
2022 Pygmy Rabbit
Survey Results
Baker County



Pygmy Rabbit Survey Area

- Survey Complete
- Level of Pygmy Rabbit Habitat
 - Habitat
 - Poor Habitat
 - Not Habitat
- Parcel Boundary

Project Features (March 21, 2022)

- Mile
- Tenth-Mile
- Route
- Access
 - Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
 - New Road, Primitive
- Land Status
 - Bureau of Land Management
 - Private
 - State or Local Parks and Recreation or Wildlife

Note:

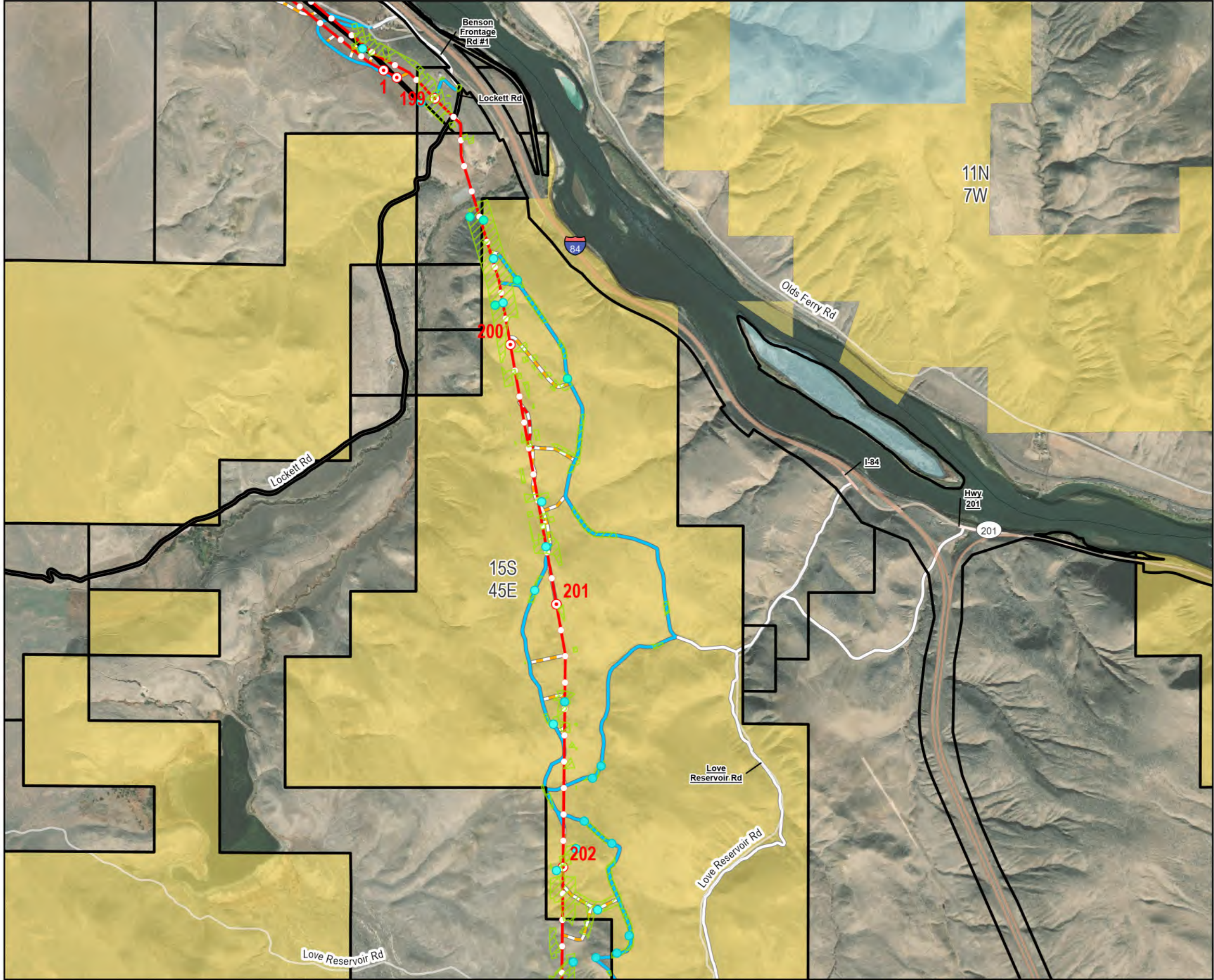
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-9
2022 Pygmy Rabbit
Survey Results
Malheur County



Pygmy Rabbit Survey Area

- Survey Complete
- Level of Pygmy Rabbit Habitat
 - Habitat
 - Poor Habitat
 - Not Habitat
- Parcel Boundary

Project Features (March 21, 2022)

- Mile
- Tenth-Mile
- Route
- Access
 - Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - New Road, Bladed
 - New Road, Primitive
- Land Status
 - Bureau of Land Management
 - Fish and Wildlife Service
 - Private
 - State or Local

Note:

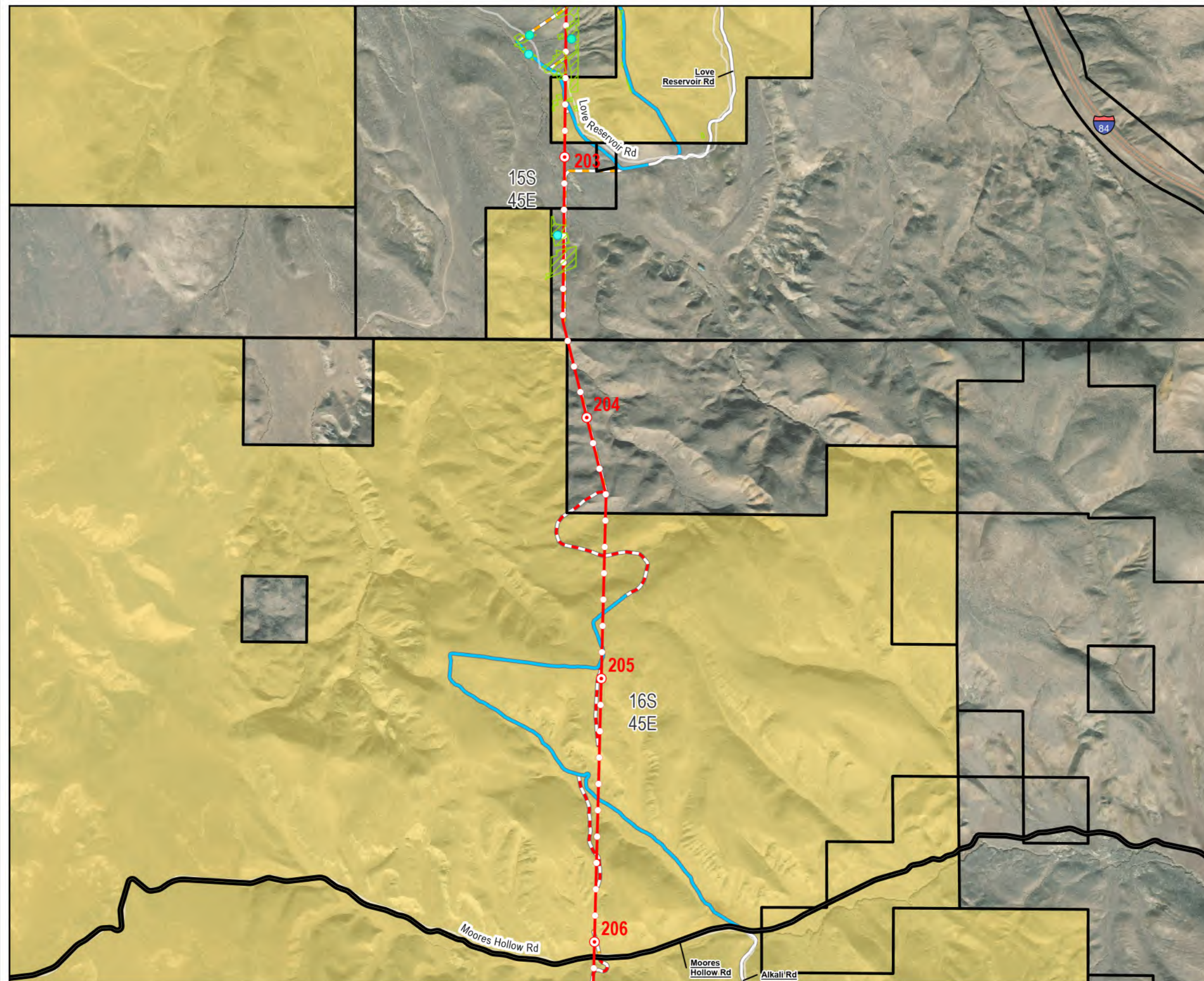
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BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-10
2022 Pygmy Rabbit
Survey Results
Malheur County



Pygmy Rabbit Survey Area
 Survey Complete
Level of Pygmy Rabbit Habitat
 Habitat
 Poor Habitat
 Parcel Boundary

Project Features (March 21, 2022)
 Mile
 Tenth-Mile
 Route
Access
 Existing Road, No Substantial Modification, 0-20% Improvements
 Existing Road, Substantial Modification, 21-70% Improvements
 New Road, Bladed
 New Road, Primitive
Land Status
 Bureau of Land Management
 Private

Note:

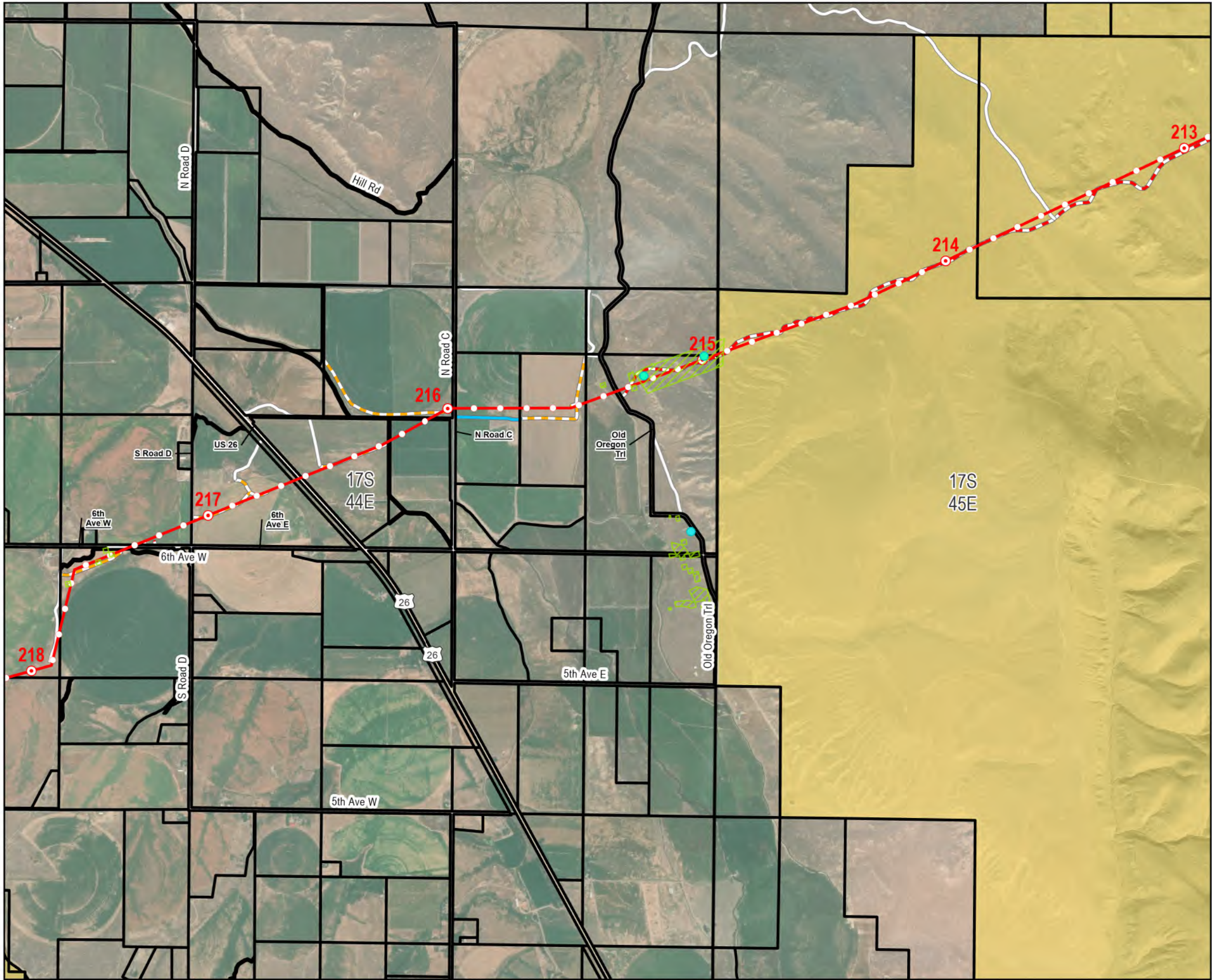
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BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon), Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-11
2022 Pygmy Rabbit
Survey Results
Malheur County



Pygmy Rabbit Survey Area

- Survey Complete
- Level of Pygmy Rabbit Habitat
 - Habitat
 - Not Habitat
- Parcel Boundary

Project Features (March 21, 2022)

- Mile
- Tenth-Mile
- Route
- Access
 - Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - New Road, Bladed
 - New Road, Primitive
- Land Status
 - Bureau of Land Management
 - Private

Note:

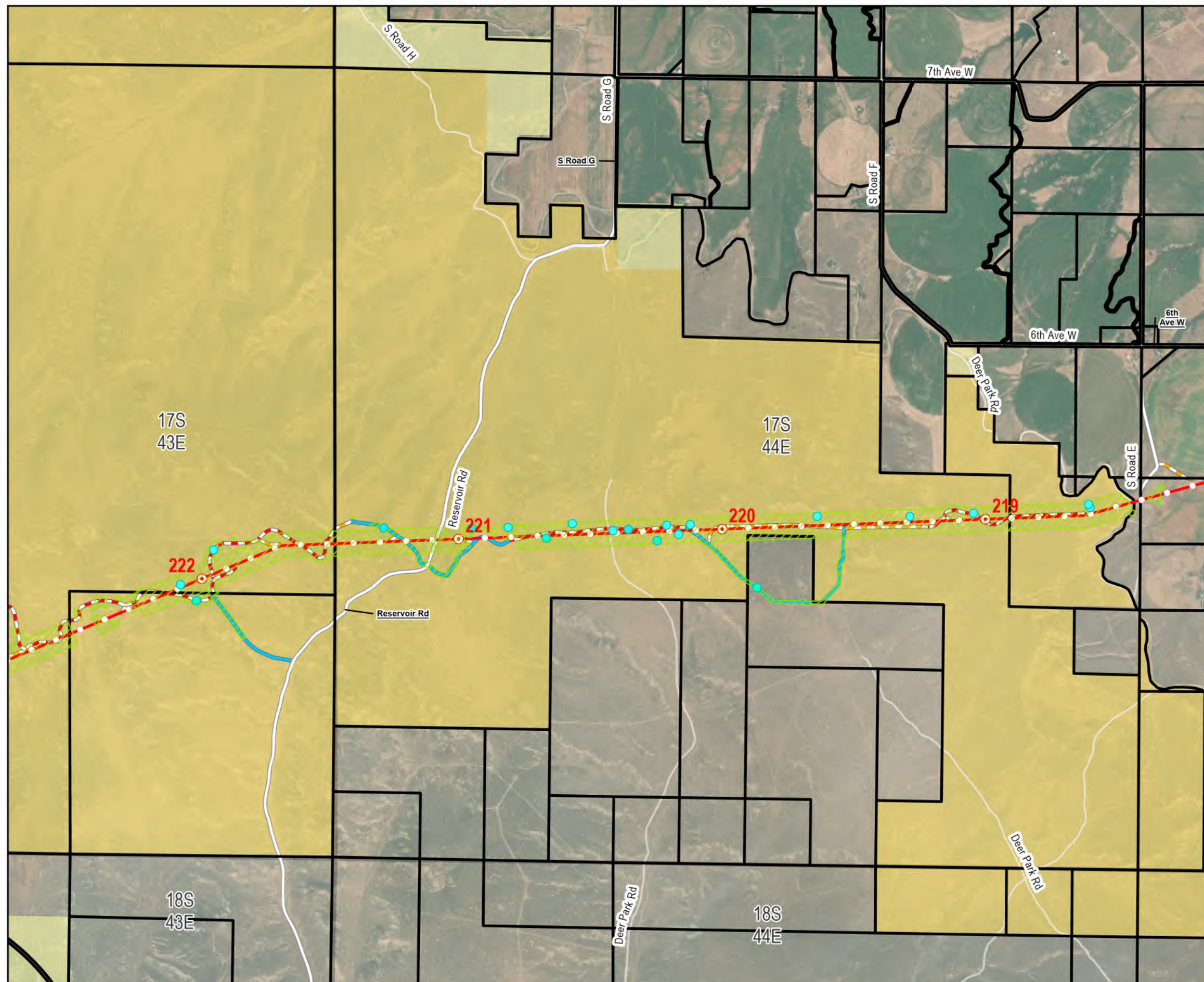
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-12
2022 Pygmy Rabbit
Survey Results
Malheur County



Pygmy Rabbit Survey Area
 Survey Complete
 Level of Pygmy Rabbit Habitat
 ● Habitat
 ○ Poor Habitat
 ● Not Habitat
 Parcel Boundary

Project Features (March 21, 2022)
 ● Mile
 ○ Tenth-Mile
 Route
 Access
 Existing Road, No Substantial Modification, 0-20% Improvements
 Existing Road, Substantial Modification, 21-70% Improvements
 New Road, Bladed
 New Road, Primitive
 Land Status
 Bureau of Land Management
 Bureau of Reclamation
 Private

Note:

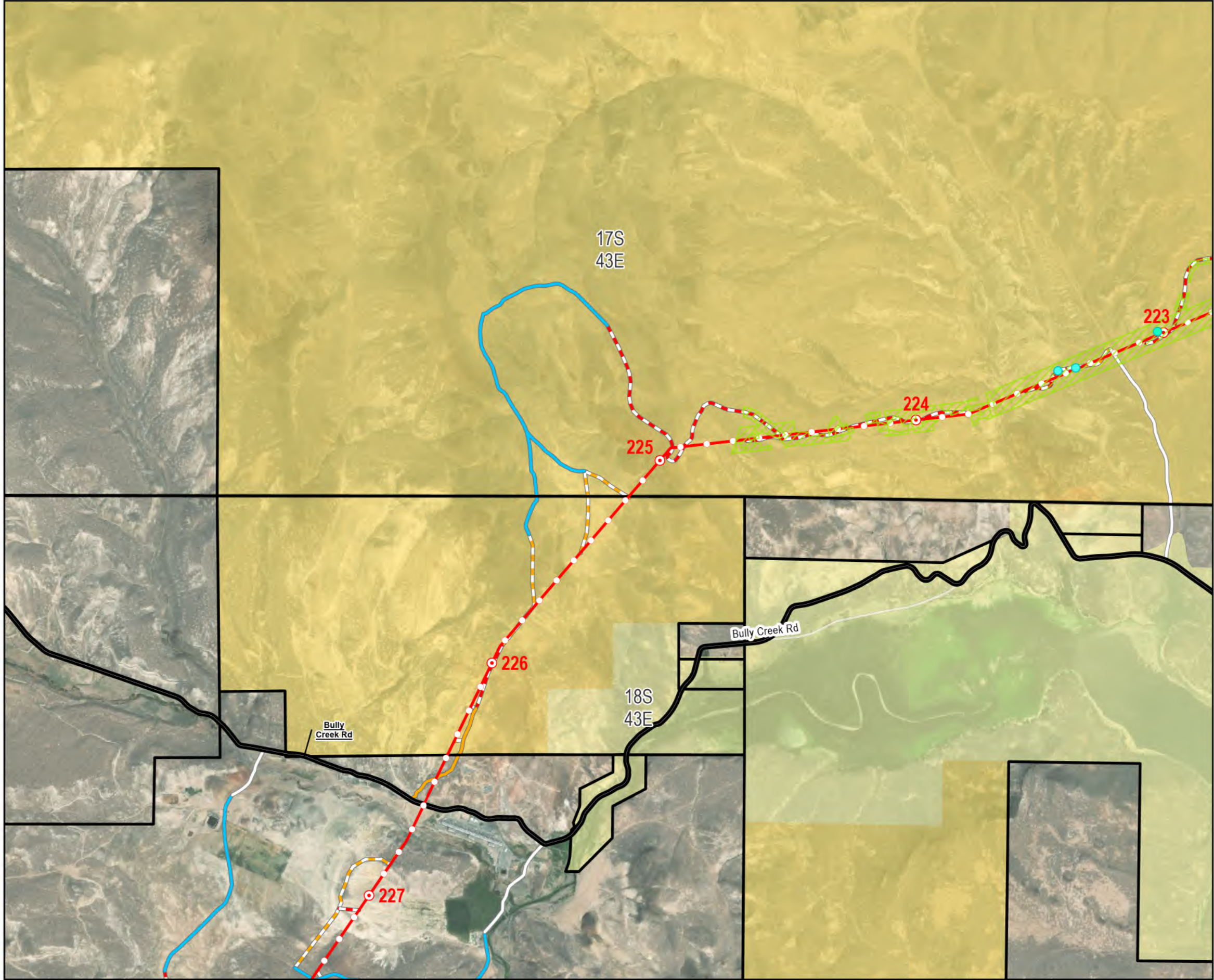
Data Source(s):
 BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
 Tetra Tech

Base Map:
 National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-13
2022 Pygmy Rabbit
Survey Results
Malheur County



- Pygmy Rabbit Survey Area**
- Survey Complete
 - Level of Pygmy Rabbit Habitat
 - Habitat
 - Poor Habitat
 - Parcel Boundary
- Project Features (March 21, 2022)**
- Mile
 - Tenth-Mile
 - Route
 - Access
 - Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
 - New Road, Primitive
 - Land Status
 - Bureau of Land Management
 - Bureau of Reclamation
 - Private

Note:

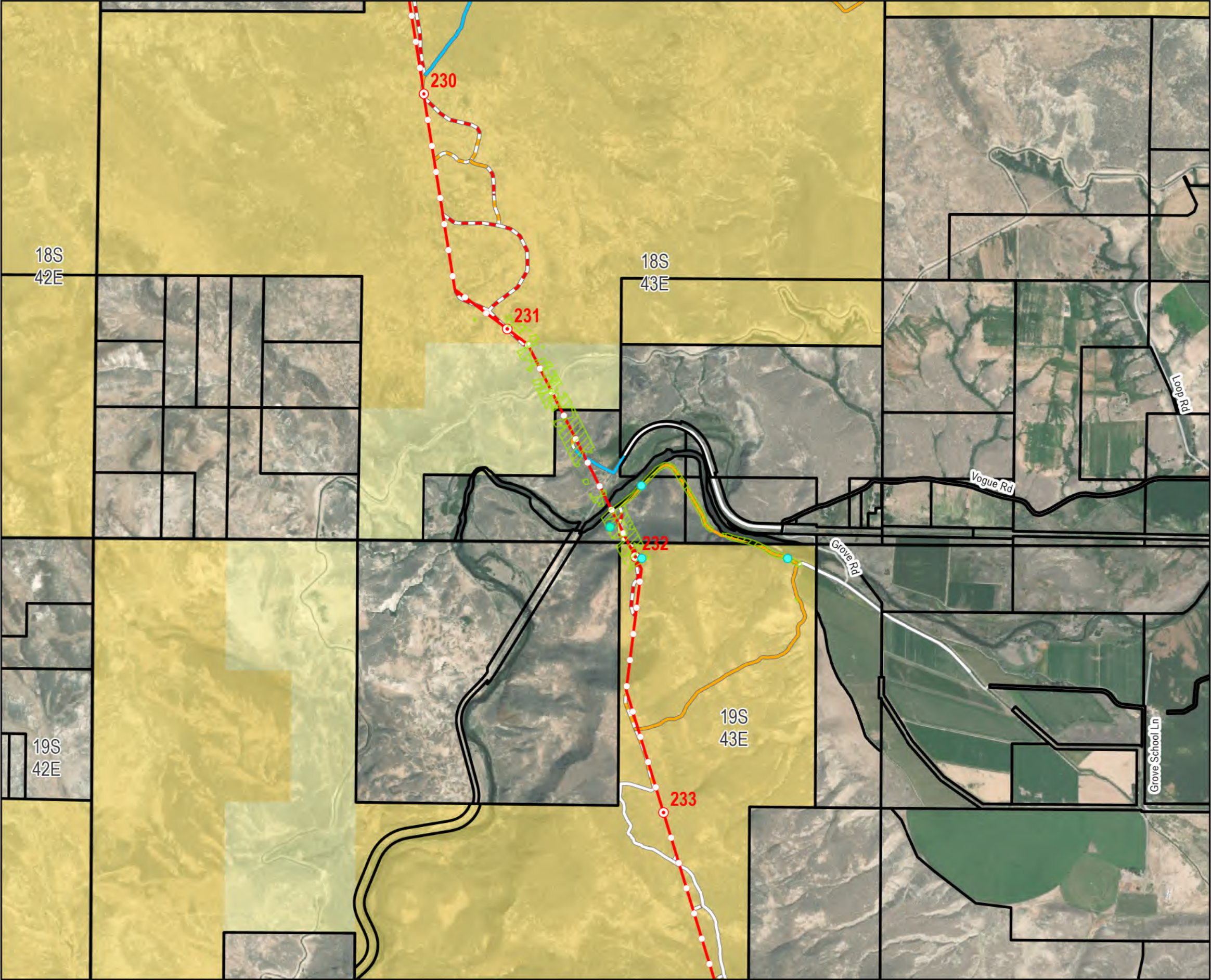
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BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-14
2022 Pygmy Rabbit
Survey Results
Malheur County



- Pygmy Rabbit Survey Area**
- Survey Complete
 - Level of Pygmy Rabbit Habitat
 - Habitat
 - Poor Habitat
 - Parcel Boundary
- Project Features (March 21, 2022)**
- Mile
 - Tenth-Mile
 - Route
- Access**
- Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
 - New Road, Primitive
- Land Status**
- Bureau of Land Management
 - Bureau of Reclamation
 - Private

Note:

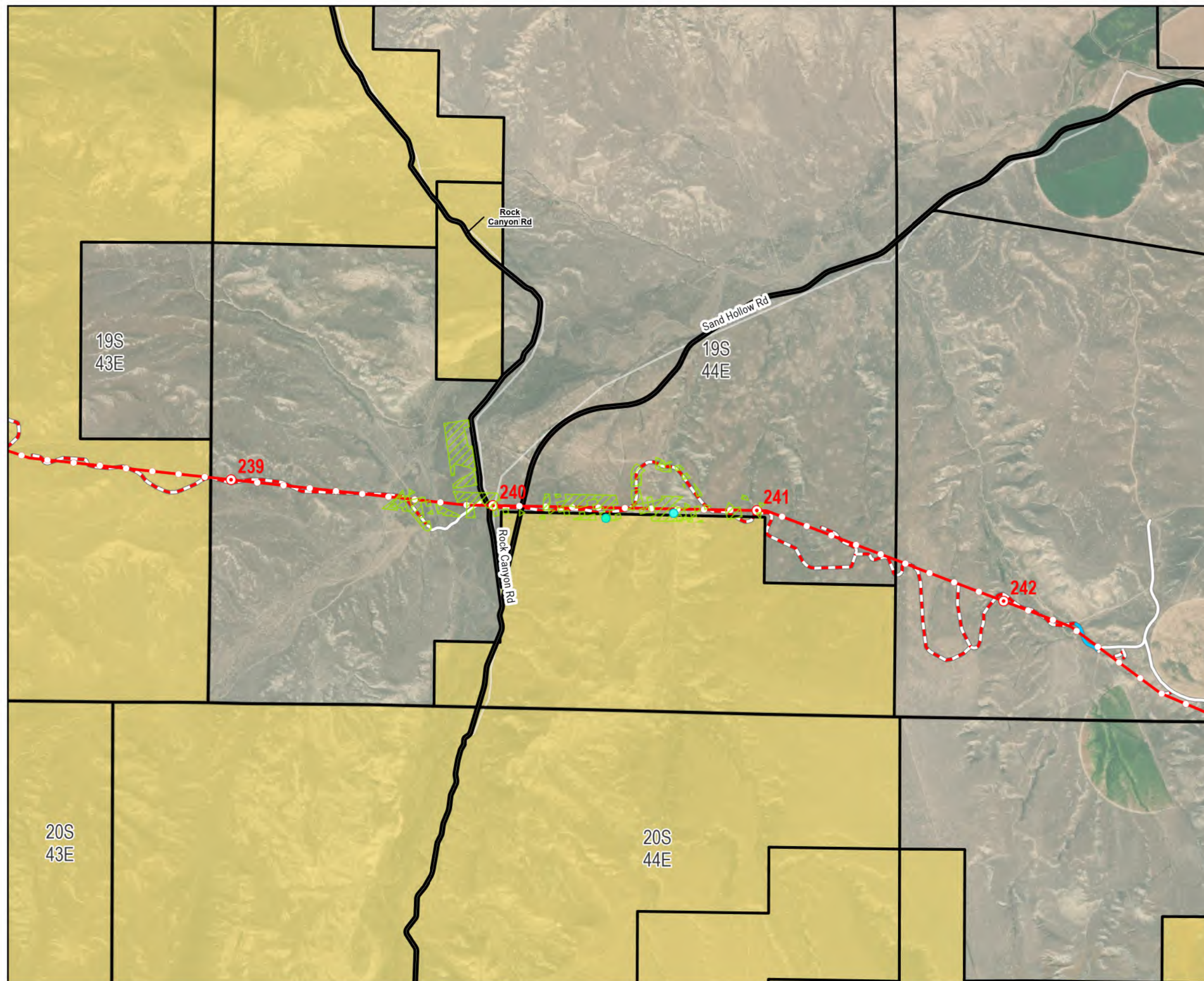
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-15
2022 Pygmy Rabbit
Survey Results
Malheur County



Pygmy Rabbit Survey Area
 [Green hatched box] Survey Complete
 Level of Pygmy Rabbit Habitat
 [Green circle] Habitat
 [Yellow circle] Poor Habitat
 [Black line] Parcel Boundary

Project Features (March 21, 2022)
 [Red circle with dot] Mile
 [Red circle] Tenth-Mile
 [Red line] Route
Access
 [Black line] Existing Road, No
 [Grey line] Substantial Modification, 0-20% Improvements
 [Blue line] Existing Road, Substantial Modification, 21-70% Improvements
 [Red dashed line] New Road, Bladed
Land Status
 [Yellow box] Bureau of Land Management
 [White box] Private

Note:

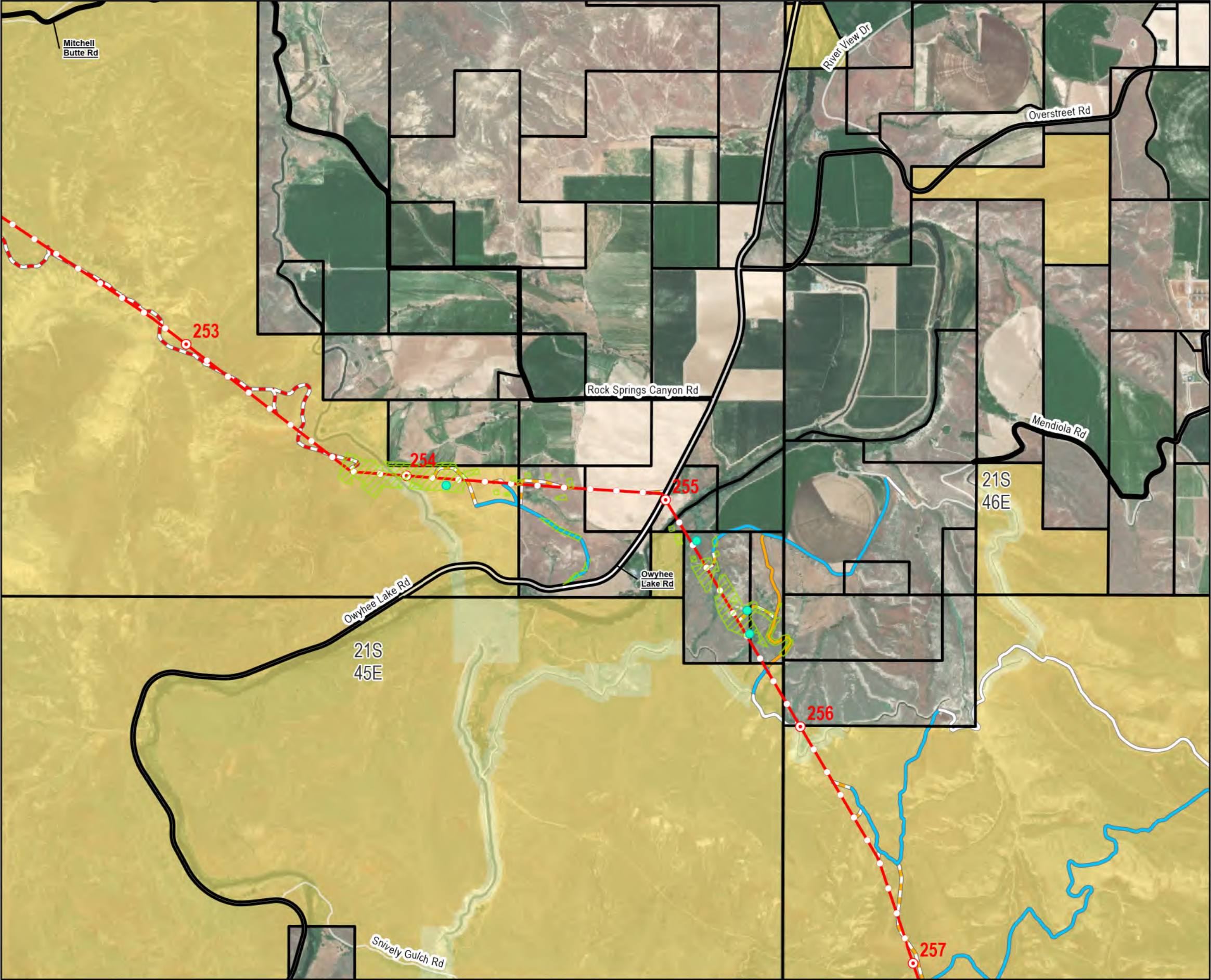
Data Source(s):
 BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon), Tetra Tech

Base Map:
 National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-16
2022 Pygmy Rabbit
Survey Results
Malheur County



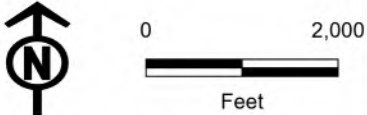
Pygmy Rabbit Survey Area
Survey Complete
Level of Pygmy Rabbit Habitat
Habitat
Parcel Boundary

Project Features (March 21, 2022)
Mile
Tenth-Mile
Route
Access
Existing Road, No Substantial Modification, 0-20% Improvements
Existing Road, Substantial Modification, 21-70% Improvements
Existing Road, Substantial Modification, 71-100% Improvements
New Road, Bladed
New Road, Primitive
Land Status
Bureau of Land Management
Bureau of Reclamation
Private

Note:

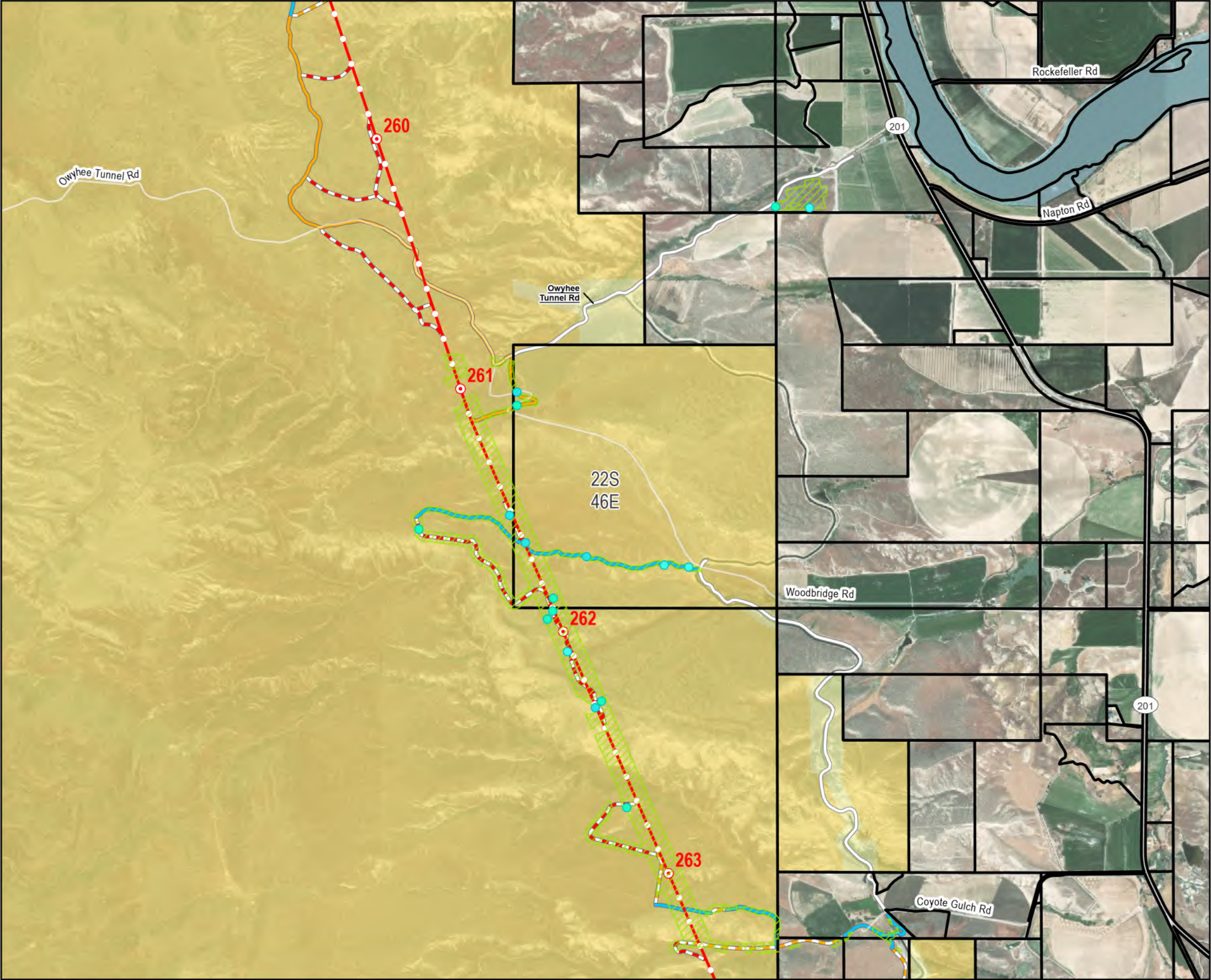
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon), Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-17
2022 Pygmy Rabbit
Survey Results
Malheur County



- Pygmy Rabbit Survey Area**
- Survey Complete
 - Level of Pygmy Rabbit Habitat
 - Habitat
 - Poor Habitat
 - Not Habitat
 - Parcel Boundary
- Project Features (March 21, 2022)**
- Mile
 - Tenth-Mile
 - Route
 - Access
 - Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
 - New Road, Primitive
 - Land Status
 - Bureau of Land Management
 - Bureau of Reclamation
 - Private
 - State or Local

Note:

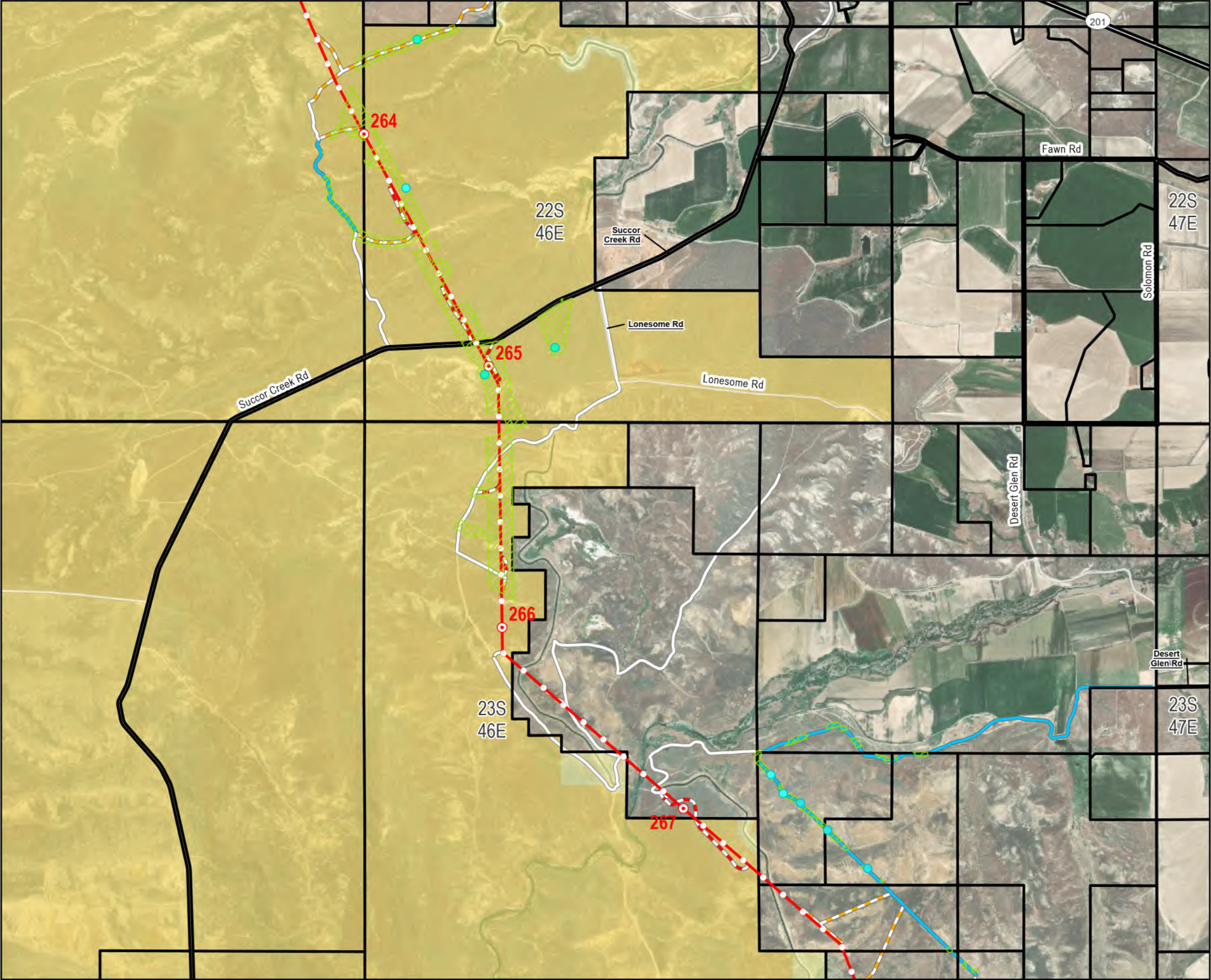
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-18
2022 Pygmy Rabbit
Survey Results
Malheur County



- Pygmy Rabbit Survey Area**
- Survey Complete
- Level of Pygmy Rabbit Habitat**
- Habitat
 - Poor Habitat
 - Not Habitat
 - Parcel Boundary
- Project Features (March 21, 2022)**
- Mile
 - Tenth-Mile
 - Route
- Access**
- Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - New Road, Bladed
 - New Road, Primitive
- Land Status**
- Bureau of Land Management
 - Bureau of Reclamation
 - Private

Note:

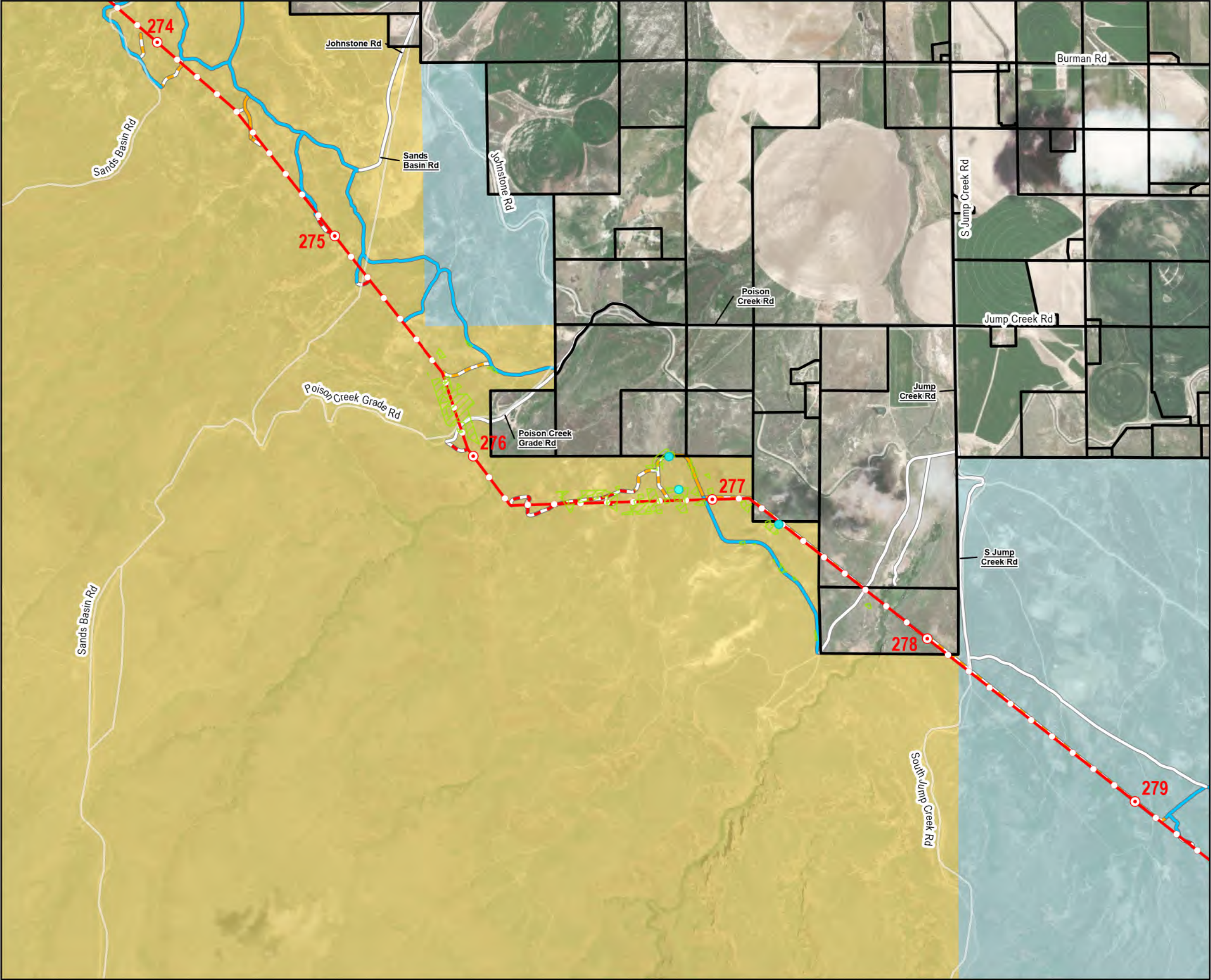
Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



Boardman to Hemingway
Transmission Project

Figure 1-19
2022 Pygmy Rabbit
Survey Results
Owyhee County



- Pygmy Rabbit Survey Area**
- Survey Complete
 - Level of Pygmy Rabbit Habitat
 - Poor Habitat
 - Not Habitat
 - Parcel Boundary
- Project Features (March 21, 2022)**
- Mile
 - Tenth-Mile
 - Route
 - Access
 - Existing Road, No Substantial Modification, 0-20% Improvements
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
 - New Road, Primitive
 - Land Status
 - Bureau of Land Management
 - Private
 - State or Local

Note:

Data Source(s):
BLM, Esri, NPS, SHPO (Idaho), SHPO (Oregon),
Tetra Tech

Base Map:
National Geographic Society (2013), i-cubed



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.

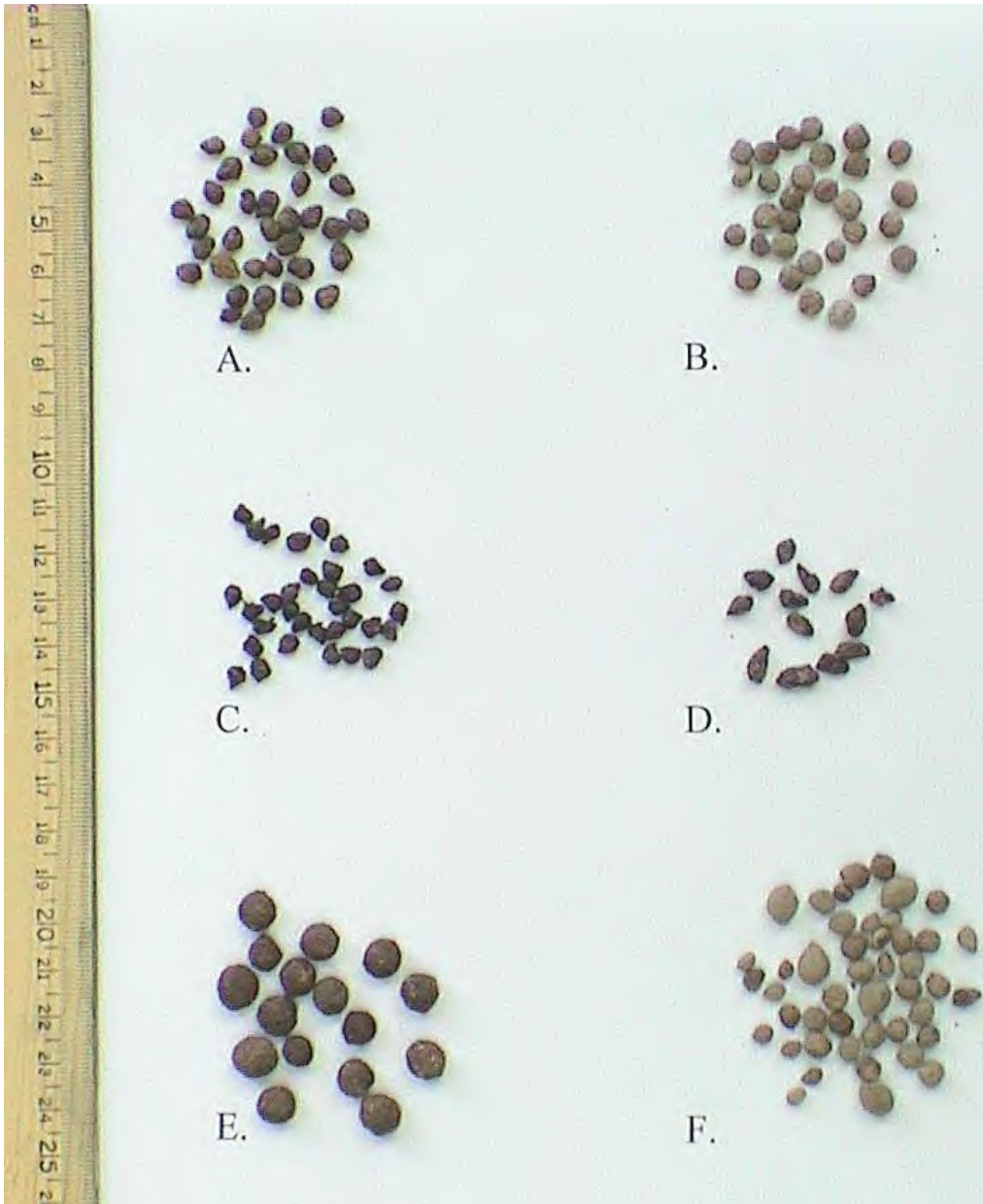


Tracks & other sign

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

R:\loc\fuels\Wildlife\Methods\Instructional pygmy rabbit surveys_SMarch_2020

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 hairy than Pygmy rabbits.

Looking for burrows:

Pygmy rabbits are one of two rabbits that excavate their own burrows.

Habitat: 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.

Burrows: 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 (Coprophagy) 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		Cottontail		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): _____ Affiliation: _____
Field Office: _____ Survey Acres: _____
Address: _____ Phone: _____
Observation Date: _____ Site Name: _____ Co.: _____ State: _____ Site #: _____
Township: _____ Range: _____ Meridian: _____ Section: _____ Quarter/Quarter: _____ of Quarter: _____
Project / Transect ID #: _____ Field Map ID: _____
Survey Method: _____ Search Time: Start: _____ Stop: _____

GPS Data

Projection: Decimal Degrees ☐ Decimal Minutes ☐ Degrees/Minutes/Seconds ☐ UTM Zone: 12 ☐ 13 ☐
Datum: NAD27 ☐ NAD83 ☐ WGS84 ☐
Coordinates:
Starting point Easting _____ Northing _____ Elevation _____
Accuracy: PDOP _____ FOM _____ +/- _____ Feet ☐ Meters ☐

Land Ownership: State ☐ BLM ☐ USFS ☐ USFWS ☐ Private* ☐ (state below)
Tribal ☐ Military ☐ Nat. Park ☐ Other: _____

*Private landowner / Address / Phone: _____

Potential Threats to Area: Agriculture ☐ Fire ☐ Development ☐ Grazing ☐ OHV ☐ None ☐ Other: _____

Summary of Results for Survey Route

Pellets collected? Yes ☐ No ☐
Pygmy rabbit observed? Yes ☐ No ☐ Pygmy Rabbit sign observed? Yes ☐ No ☐ Possible burrows ☐ Possible Pellets ☐
Summary of numbers of burrows B+FP: _ B+OP: _ B: _ _ UB+FP: Col: _ _ B+dig: _ FP alone: _ _
Length of survey route Miles: _____ Feet: _____ Meters: _____
Predators (T- tracks, S- scat, V-visual) Coyote T S V Fox T S V Badger T S V Weasel T S V Bobcat T S V
Raptor T S V Other _____

Notes. Provide directions, describe landscape setting, note other animals, explain why if no pygmy rabbits were found, describe behavior of any pygmy rabbits seen, etc.

CODES FOR DATA

Burrow Status	B+FP – used burrow plus brown, green, or black pellets	B+OP – burrow plus grey pellets	B – open burrow, no pellets	UB +FP Unused burrow, fresh pellets	Col – collapsed burrow	B+dig – burrow, fresh digging, no pellets	FP – fresh pellets alone	Poss Possible PR burrow
Burrow Details	T –Clean trail TS – tracks in snow	O – Open US – Untracked snow	Col – Collapsed B – At base of bush	Deb- Debris filled R – At base of rock	Dig - Fresh digging E – Enlarged by predator			
Pellet Quantity	H – high, lots, a carpet M – moderate F - few							
Soil	L - Loam	S - sand	C - Clay	G - Gravelly	R - Rocky			
Canopy Cover (20 ft radius)	S – shrubs 0 –(0 – Trace)	F - Forbs 1 - (1-10%)	G – grass 2 - (11-25%)	B - bare ground 3 - (26-50%)	4 - (51-75%)	5 –(76-100%		
Grazing use level	0 - None 1 - slight 2 - light 3 - moderate 4 - heavy 5 – severe <i>Use descriptions from BLM's Landscape Appearance Method</i>							

[illegible]

Burrow Codes:

Used burrow plus fresh pellets (B+FP): 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.

Unused burrow plus fresh pellet (UB+FP): 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.

Burrow, 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.)

Fresh digging at a burrow but no pellets (B+dig): 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.

Possible PR burrow (Poss): 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.

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 4: Not Habitat. Grassland with rabbitbrush, no sagebrush present.



Photo 5: Not Habitat. Greasewood and bur buttercup, no sagebrush present.



Photo 6: Not Habitat. Grassland.



Photo 7: Not Habitat. Agriculture and canal.



Photo 8: Not Habitat. Cattle pasture.



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 16: Habitat.



Photo 17: Habitat.



Photo 18: Habitat.



Photo 19: Habitat.



Photo 20: Habitat.



Photo 21: Habitat.



Photo 22: 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									
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 ¹	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
Baker County, OR	Baker County Comprehensive Land Use Plan (1993), as updated through 2012	Y	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	Baker County Oregon Natural Resources Plan (2016)	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
			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		N
			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		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	Y		N
			OR Highway 86	Appendix I, Plate 10	East of Richland and east of Halfway to Copperfield; both segments outside of the analysis area	N/A	N		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)
Owyhee County, ID	Owyhee County Comprehensive Plan (2010)	Y	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
			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)	Y	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									
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 Lone	City of Lone 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)	Y	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 Vale	City of Vale Comprehensive Plan (2003) and Development Code	N	None identified	Development Code, Title VIII	N/A	N/A	N	City of Vale 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)	Y	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)	Y	State Scenic Waterways	N/A	Outside of Analysis Area	N/A	N	State Scenic Waterways (2019)	N
Oregon Department of Fish and Wildlife (ODFW)	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
	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									
BLM, Vale District, Baker Resource Area	Baker Resource Management Plan (1989a)	Y	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
			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
			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, Vale District, Malheur Resource Area	Proposed Southeastern Oregon Resource Management Plan and Final Environmental Statement (2001)	Y	BLM-administered lands managed as VRM Class I and Class II	Chapter 2, p. 101; Chapter 3, pp. 274-276; Map VRM-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
			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
			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
			Owyhee Views ACEC	pp. 68-102	Multiple tracts of BLM-administered lands adjacent to Lake Owyhee in eastern Malheur County, all managed as VRM 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 District, Owyhee Resource Area	Owyhee Resource Management Plan (1999)	Y	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
			Jump Creek Canyon ACEC	pp. 47-48, 81-85, Map ACEC-1	Portion of Jump Creek Canyon area managed as VRM Class I	VRM O1	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? (Y/N)	Plan Updates	Change in Findings? (Y/N)
			and Leslie Gulch ACECs						
BLM, Boise District, Cascade Resource Area	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
			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	N
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)
FWS, Deer Flat 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

¹ This resource is analyzed as part of the Blue Mountain State Scenic Corridor administered by OPRD.

Table 2. Updated Visual Impact Assessment Results

Scenic Resource by Jurisdiction (Map ID) ¹	Original Distance to Approved Route	Change in Distance ²	Map Sheet Reference (Figure 7-11)	KOP(s) ³	Change in Visibility Potential	Part 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination				Change to Significance Determination ⁹	
						Scenic Quality/ Scenic Attractiveness Class	Landscape Character ⁴	Observer Characteristics (Geometry/ Exposure) ⁵	Impact Duration ⁶	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁷	Contribution of the Project to Impacts ⁸	Original Significance Determination ⁹		
County – Union																		
Blue Mountain Forest Wayside (SR U1)	Crossed	No change	1	4-5	No significant change	B	Nat App	T	LT	Low	Low	Low	Low	Low	NA	PE	Less than Significant	N
County – Baker																		
OR Highway 203 (SR B1)	3.3 miles	No change	2	5-34; 5-35	No significant change	C	Nat App	T	LT	Low	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	C	Nat App	T	LT	Med	Med	Low	Med	Med	NP	CE	Less than Significant	N
OR Highway 245 (SR B3)	7 miles	No change	2	N/A	No significant change	--	--	--	--	--	--	--	--	--	--	--	Less than Significant ⁸	N
Interstate 84, Pleasant Valley-Durkee area (SR B4)	Crossed	No change	2	5-26; 5-15	No significant change	B	Cult	T	LT	High	High	Med	High	High	NP	PE	Less than Significant	N
Interstate 84, Huntington to Baker/Malheur County line (SR B5)	0.2 mile	-0.1 miles (0.1 miles), Durbin Quarry Alternative	2	5-34b	No significant change	B	Cult	T	LT	High	High	Med	High	High	NP	PE	Less than Significant	N Change in distance did not result significant increase in visibility.
State of Oregon: Oregon Parks and Recreation Department																		
Blue Mountain Forest State Scenic Corridor (SR U1)	Crossed	No change	1	4-5	No significant change	B	Nat App	T	LT	Low	Low	Low	Low	Low	NA	PE	Less than Significant	N
Federal – BLM, Vale District, Baker Resource Area																		

Scenic Resource by Jurisdiction (Map ID) ¹	Original Distance to Approved Route	Change in Distance ²	Map Sheet Reference (Figure 7-11)	KOP(s) ³	Change in Visibility Potential	Part 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination				Change to Significance Determination ⁹
						Scenic Quality/ Scenic Attractiveness Class	Landscape Character ⁴	Observer Characteristics (Geometry/ Exposure) ⁵	Impact Duration ⁶	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁷	Contribution of the Project to Impacts ⁸	Original Significance Determination ⁹	
Powder River Canyon – Keating (VRM B2)	5.7 miles	No change	2	N/A	No change	--	--	--	--	--	--	--	--	--	--	Less than Significant ⁸	N
Burnt River Canyon (VRM B3)	Crossed	No change	2	5-81	Pockets of slight increase	B	Nat App	T	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	B	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	B	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	B	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	--	--	--	--	--	--	--	--	--	--	Less than Significant ⁸	N
Oregon Trail ACEC – Straw Ranch 2 Parcel (SR B6)	1.1 mile	No change	2	N/A	No significant change	C	Nat App	T	LT	Low	Low	Low	Low	NA	CE	Less than Significant	N

Scenic Resource by Jurisdiction (Map ID) ¹	Original Distance to Approved Route	Change in Distance ²	Map Sheet Reference (Figure 7-11)	KOP(s) ³	Change in Visibility Potential	Part 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination				Change to Significance Determination ⁹
						Scenic Quality/ Scenic Attractiveness Class	Landscape Character ⁴	Observer Characteristics (Geometry/ Exposure) ⁵	Impact Duration ⁶	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁷	Contribution of the Project to Impacts ⁸	Original Significance Determination ⁹	
Oregon Trail ACEC – Straw Ranch 1 Parcel (SR B6)	0.1 mile	No change	2	N/A	No significant change	C	Cult	T	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	C	Cult	T	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	B	Nat App	T; S	LT	Med	Med	Low	Med	NP	CE	Less than Significant	N
Federal – BLM, Vale District, Malheur Resource Area																	
Oregon Trail ACEC – Birch Creek parcel (VRM M1)	0.2	No change	2	8-3	No significant change	C	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	C	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	C	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	P	CE	Less than Significant	N

Scenic Resource by Jurisdiction (Map ID) ¹	Original Distance to Approved Route	Change in Distance ²	Map Sheet Reference (Figure 7-11)	KOP(s) ³	Change in Visibility Potential	Part 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination				Change to Significance Determination ⁹
						Scenic Quality/ Scenic Attractiveness Class	Landscape Character ⁴	Observer Characteristics (Geometry/ Exposure) ⁵	Impact Duration ⁶	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁷	Contribution of the Project to Impacts ⁸	Original Significance Determination ⁹	
Succor Creek (VRM M8)	3.9 miles	No change	3	N/A	No significant change	C	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	--	--	--	--	--	--	--	--	--	--	Less than Significant ⁸	N
Federal – BLM, Boise District, Cascade Resource Area																	
Brownlee Reservoir Southeast (VRM C1)	0.6 mile	No change	2	N/A	No significant change	B	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 ⁸	N
Federal – USFS Wallowa-Whitman National Forest																	
VQO 1	0.0 mile	No change	1	N/A	No significant change	B	Nat App	T	LT	Low	Low	Low	Low	NA	PE	Less than Significant	N
VQO 2	Crossed	No change	1	4-4; 4-24;	No significant change	B	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	B	Nat App	T	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	B	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	--	--	--	--	--	--	--	--	--	--	Less than Significant ⁸	N

Scenic Resource by Jurisdiction (Map ID) ¹	Original Distance to Approved Route	Change in Distance ²	Map Sheet Reference (Figure 7-11)	KOP(s) ³	Change in Visibility Potential	Part 1: Baseline Characteristics			Part 2: Impact Assessment				Part 3: Significance Determination				Change to Significance Determination ⁹
						Scenic Quality/ Scenic Attractiveness Class	Landscape Character ⁴	Observer Characteristics (Geometry/ Exposure) ⁵	Impact Duration ⁶	Magnitude	Resource Change	Viewer Perception	Intensity Rating	Context ⁷	Contribution of the Project to Impacts ⁸	Original Significance Determination ⁹	
OR 237 Corridor West (VQO 7)	11.7 miles	No change	2	N/A	No change	--	--	--	--	--	--	--	--	--	--	Less than Significant ⁸	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	--	--	--	--	--	--	--	--	--	--	Less than Significant ⁸	N

¹ 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.

² “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.

³ KOP = Key Observation Point.

⁴ Landscape Character Type: Nat App = Naturally Appearing; Cult = Cultural; Hist = Historical.

⁵ Observer Characteristics: T= Transient; S = Stationary.

⁶ Duration: LT = Long-term; ST= Short-term.

⁷ Context: NP = Not Precluded; P = Precluded; NA = Not Analyzed; low intensity impact.

⁸ 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).

⁹ 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 Updated Analysis Area and Associated Impacts

Recreational Opportunity within the Updated Analysis Area ¹ (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
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 multi-use 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.

Recreational Opportunity within the Updated Analysis Area ¹ (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
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 day-use and overnight park facilities. Therefore, overall impacts to visitor experience will be less than significant.

Recreational Opportunity within the Updated Analysis Area ¹ (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
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 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 Area ¹ (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 multi-use 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 ¹ (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
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. ³	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. ³	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. ³ 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. ³ Medium intensity and less than significant.	Impacts limited to temporary traffic increases and medium intensity visual impacts. Overall impacts less than significant.

¹ 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.

² 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.

³ 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

Recreational Opportunity (Reference Sources)	Responsible Entity	Description	Area	Importance Factors					Important Opportunity?
				Designation or Management	Demand	Qualities	Rareness	Replaceability	
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	Between 167,000 and 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 enclosure, 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)	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)
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)

Recreational Opportunity (Reference Sources)	Responsible Entity	Description	Area	Importance Factors					Important Opportunity?
				Designation or Management	Demand	Qualities	Rareness	Replaceability	
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 appears to be at least moderate.	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.	Main campground with capacity of 121 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. Day-use and support facilities include large picnic area, boat ramp, wastewater dump station, fishing dock, viewing deck, basketball and volleyball courts, and shelter with Oregon Trail interpretive displays. Outstanding opportunities for reservoir-oriented recreation.	One of 12 OPRD developed recreation sites with camping facilities in eastern Oregon, including four on lakes or reservoirs. Rare facility, based on size of reservoir, development level and setting.	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.	Camp (18 sites) and picnic facilities 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 facility development and location on a key river.	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	Assumed light.	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	Moderate use level, per USFS.	Facilities include a large parking area, 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 prominent viewpoint. Unusual interpretive focus for the Blue Mountain region.	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)

Recreational Opportunity (Reference Sources)	Responsible Entity	Description	Area	Importance Factors					Important Opportunity?
				Designation or Management	Demand	Qualities	Rareness	Replaceability	
Morgan Lake Park (City of La Grande 2013, 2022, undated)	City of La Grande (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	Use data not found in search; assumed light due to lack of facilities and remoteness.	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	Use data not found in search; assumed light due to lack of facilities and remoteness.	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.	Good opportunity for OHV use on sand dune terrain. Camping is available and 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	Use data not found in search; assumed light due to lack of facilities and remoteness.	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 water- based 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).

Recreational Opportunity (Reference Sources)	Responsible Entity	Description	Area	Importance Factors					Important Opportunity?
				Designation or Management	Demand	Qualities	Rareness	Replaceability	
Glass Hill Preserve/SNHA (Union County 2020, Union County 2021a)	OPRD; Blue Mountain Conservancy; Private Property	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	Use data not found in search; assumed light due to lack of facilities and remoteness (Google Earth 2017, Union County 2021). Likely no public access.	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).	Types of habitat and opportunities available at several other locations nearby (ODFW 2022a, ODFW 2022b; see previous recreation area hunting and fishing opportunities as well). Common opportunity.	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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WILDFIRE

Mitigation Plan 2022

(V3.0)
Updated June 28, 2022

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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 [application](#) 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 [Senate Bill 762](#) (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
<i>(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:</i>	See Section 3: Quantifying Wildland Fire Risk
<i>(a) Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are:</i>	See Idaho Power website for details of wildfire risk zones outside of service territory
<i>(A) Within the service territory of the Public Utility, and</i>	See Section 3.2.2: Wildfire Risk Areas
<i>(B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets.</i>	See Figure 3: B2H Proposed Route Risk Zones
<i>(b) Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.</i>	See Section 4: Costs and Benefits of Wildfire Mitigation
<i>(c) Identified preventative actions and programs that the Public Utility will carry out to minimize the risk of utility facilities causing wildfire.</i>	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
<i>(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.</i>	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
<i>(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.</i>	See Section 7.4: Public Safety Power Shutoff and Appendix B: Idaho Power's Public Safety Power Shutoff Plan
<i>(f) Identification of the community outreach and public awareness efforts that the Public Utility will use before, during and after a wildfire season.</i>	See Section 10: Communicating the Plan

Oregon Requirement	Corresponding Location in WMP
<i>(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.</i>	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)
<i>(h) Description of the procedures, standards, and time frames that the Public Utility will use to carry out vegetation management in areas the Public Utility identified as heightened risk of wildfire.</i>	See Section 8.3.2: Transmission Vegetation Management and Section 8.3.3: Distribution Vegetation Management
<i>(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.</i>	See Section 4: Costs and Benefits of Wildfire Mitigation, specifically Section 4.3: Wildfire Mitigation Cost Summary and Section 4.4: Mitigation Activities
<i>(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.</i>	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.¹ In that same time period, the wildfire season in Idaho has expanded by 70 days.² 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).

¹ 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.

² 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)

ASSET	TOTAL	IDAHO		OREGON		MONTANA		NEVADA		WYOMING	
	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	23
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	2
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	0.46

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.³

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.

³ 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:

$$\text{Wildfire Risk} = \text{Fire Probability} \times \text{Consequence}$$

The definition of each component is as follows:

Fire Probability. 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)

Consequence. Number of structures (i.e., homes, businesses, other man-made structures) that may be impacted by a wildfire.

Wildfire Risk. 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.⁴
4. The data developed above (WRF climatology, live fuel moisture, and LANDFIRE data) was used to drive a Monte Carlo⁵ 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.

⁴ Chris Lautenberger, Mapping areas at elevated risk of large-scale structure loss using Monte Carlo simulation and wildland fire modeling. IAFSS 12th Symposium 2017.

⁵ Ibid.

3.2.2. Wildfire Risk Areas

Based on the previously described modeling, draft risk tiers were generated algorithmically⁶ 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.

Table 2

Idaho Power’s Transmission and Distribution Lines by Risk Zone in Idaho and Oregon

ASSET	TOTAL	TOTAL IN WILD-FIRE RISK ZONES		YELLOW RISK ZONES - IDAHO		RED RISK ZONES - IDAHO		YELLOW RISK ZONES - OREGON		RED RISK ZONES - OREGON	
	Pole Miles	Pole Miles	%	Pole Miles	%	Pole Miles	%	Pole Miles	%	Pole Miles	%
Transmission Lines	4,841	511	11	371	8	110	2	21	0.43	0	0
Distribution Lines	19,297	1,414	7	808	4	577	3	29	0.15	0	0
Total Pole Miles	24,138	1,925	8	1,179	5	687	3	50	0.21	0	0

⁶ 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 [risk zone map](#) 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.

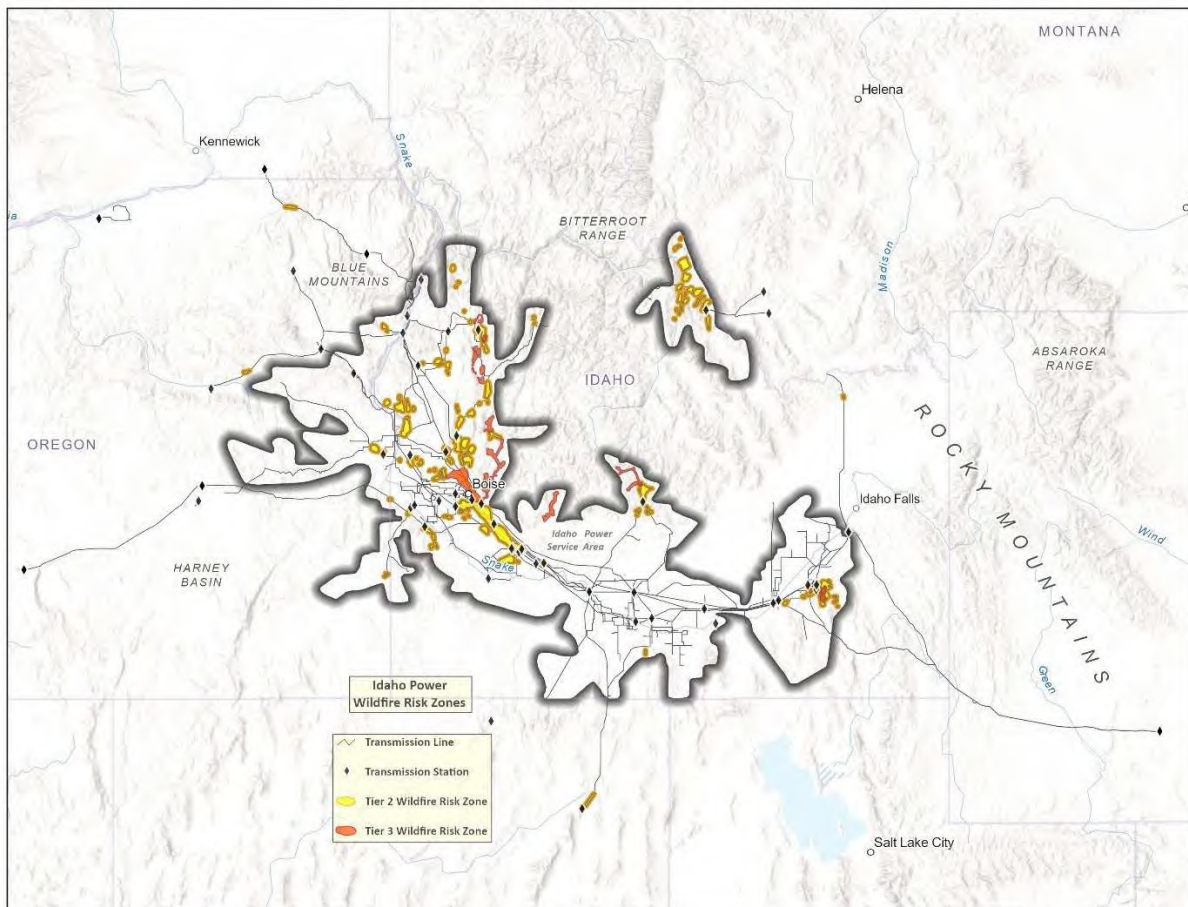


Figure 2
Wildfire Mitigation Plan—Risk Map

Additionally, Figures 3 through 6 delineate risk zones in Idaho and Oregon.

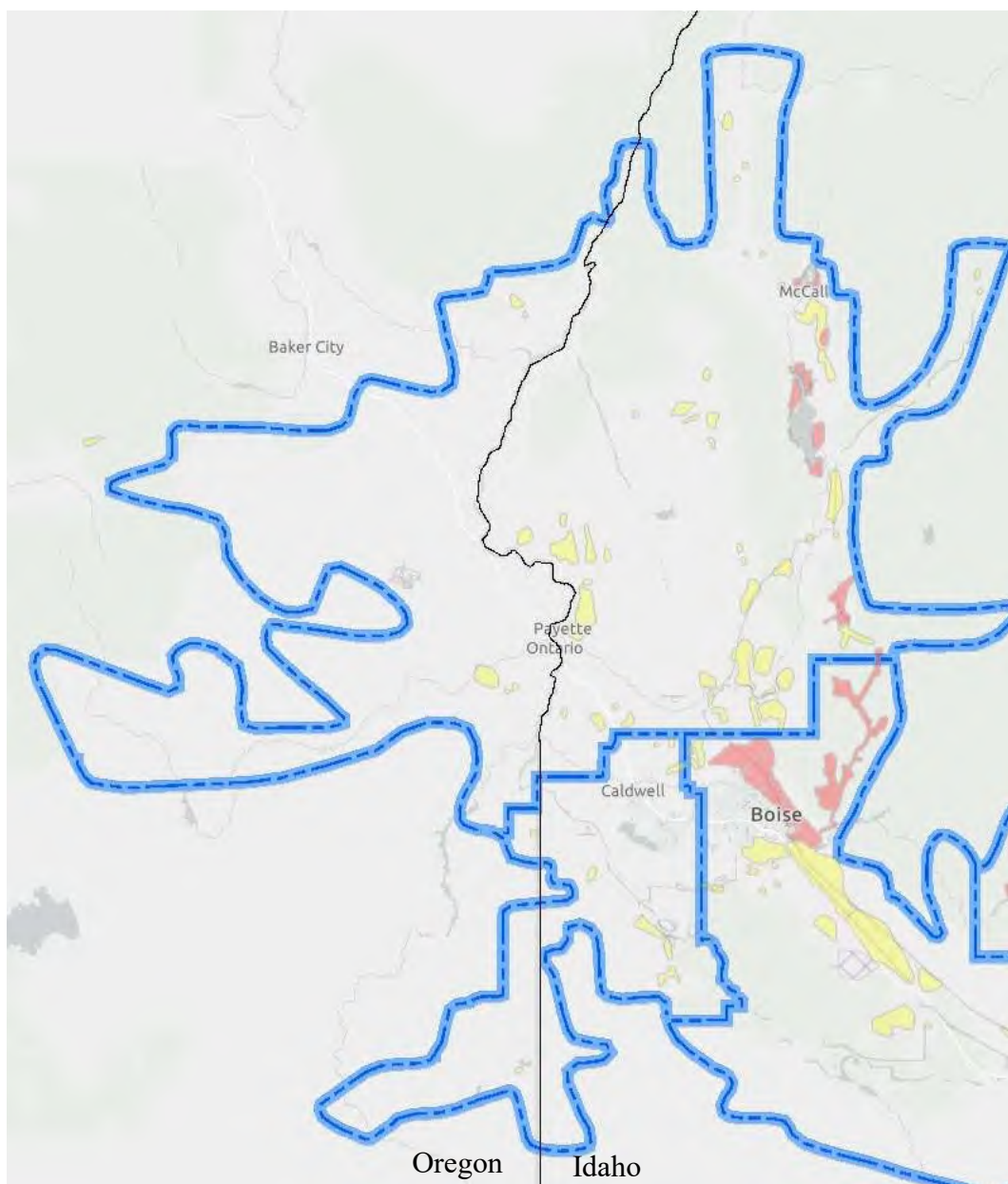


Figure 3
Wildfire Risk Map—western Idaho and eastern Oregon

Vale

Jordan Valley

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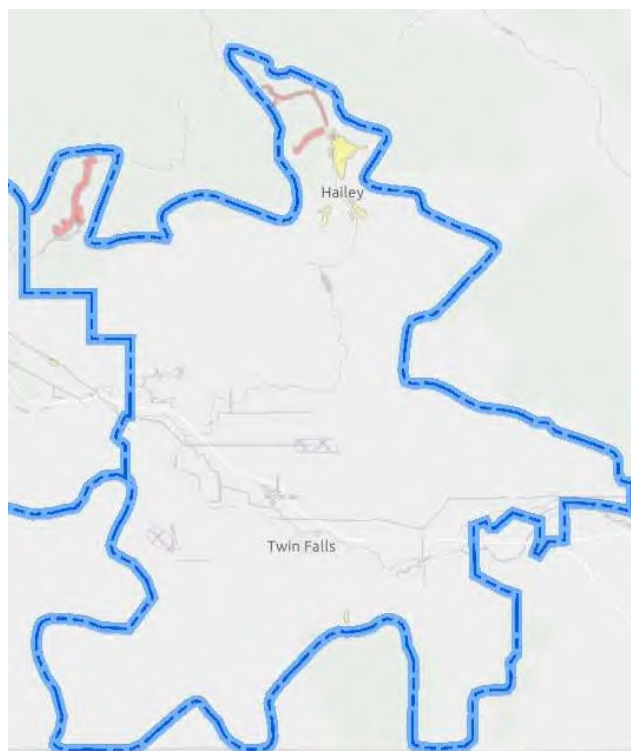


Figure 5
Wildfire Risk Map—southern Idaho

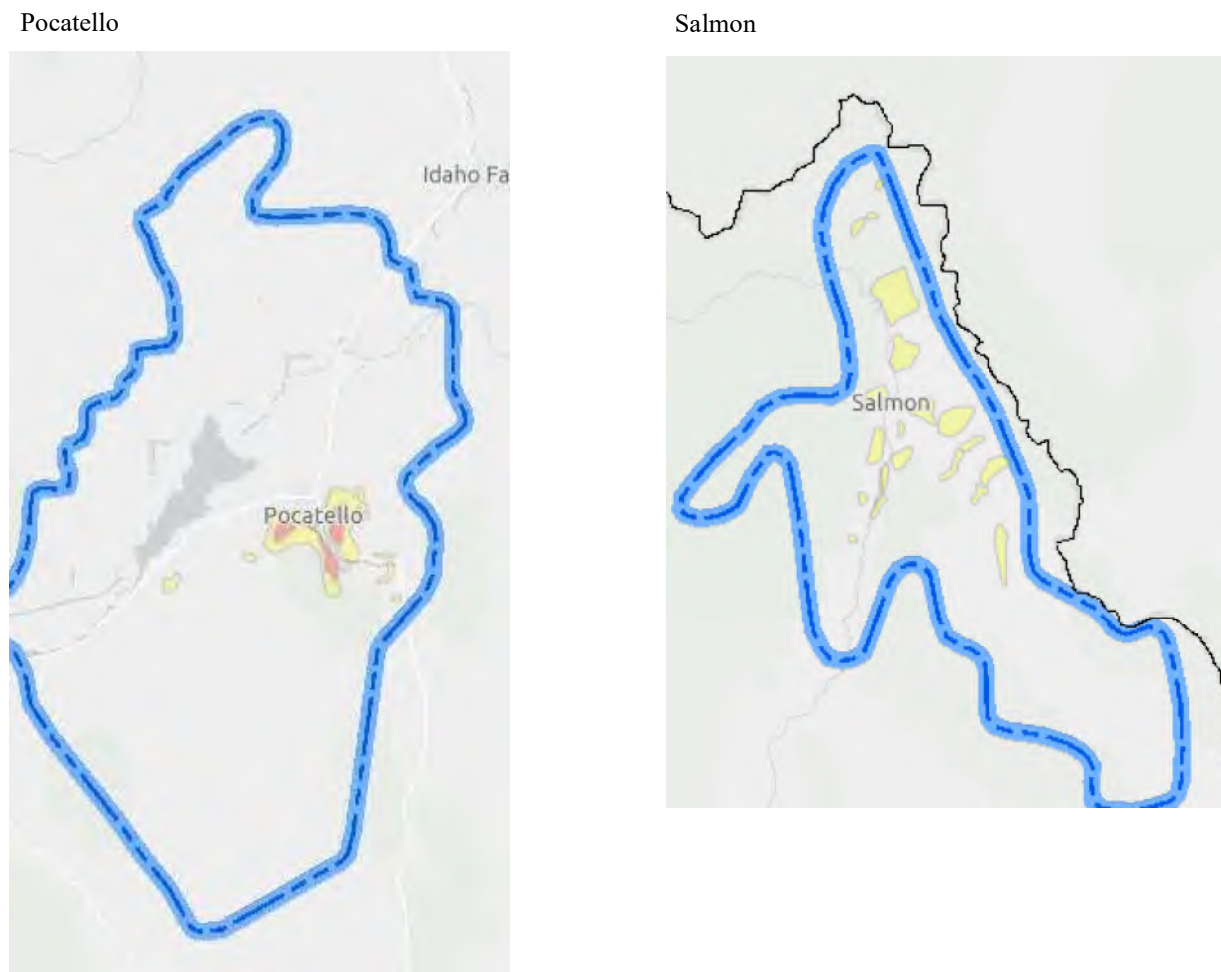


Figure 6
Wildfire Risk Map—eastern Idaho

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.

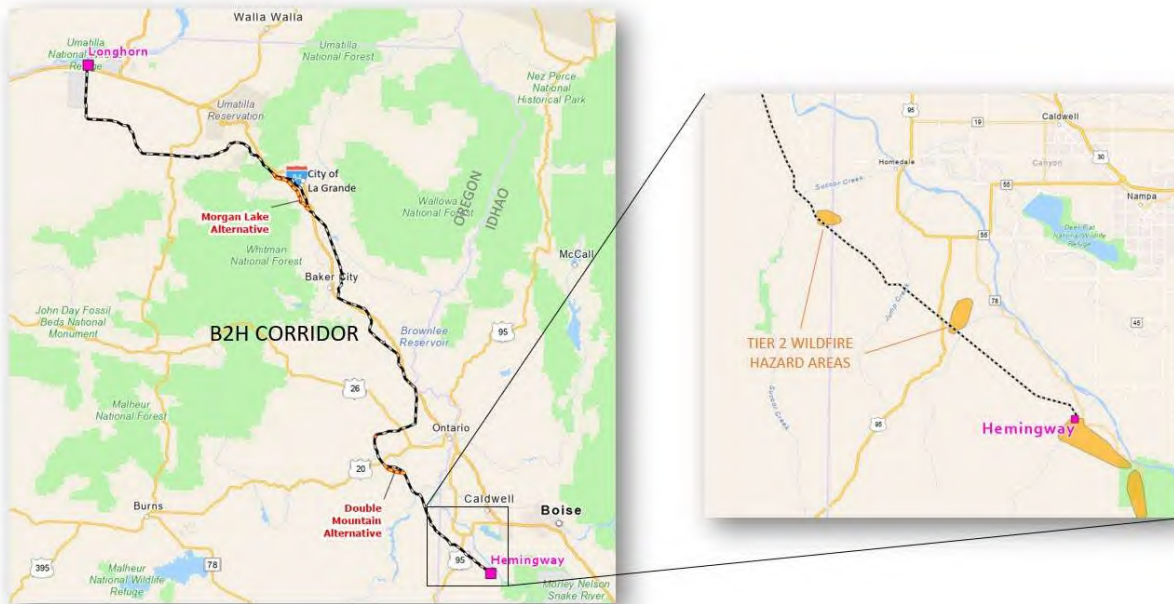


Figure 7
B2H proposed route risk zones

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.⁷ 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.⁸

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.⁹ This increase¹⁰ 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 Wildfires	No. of Confirmed 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.

⁷ *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.

⁸ Ibid.

⁹ 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>.

¹⁰ 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 4Estimated system-wide incremental O&M expenses for wildfire mitigation (2022–2025) ¹¹

Forecast of Idaho Power System Incremental O&M Expenditures (\$000s)					
	2022	2023	2024	2025	2022 - 2025
Quantifying Wildland Fire Risk					
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	\$ -	\$ -	\$ 100
Cameras	\$ 50	\$ 55	\$ 113	\$ 50	\$ 268
Mitigation - Field Personnel Practices					
Mobile Weather Kits for Field Observers	\$ 20	\$ -	\$ -	\$ -	\$ 20
Tools/Equipment	\$ 5	\$ 5	\$ 5	\$ 5	\$ 20
Mitigation - Transmission & Distribution Programs					
Wildfire Mitigation 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	\$ -	\$ -	\$ -	\$ 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	\$ 46,772

¹¹ 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 \$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 forecasting 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,¹² 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

¹² 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
≥50°F	4	4	4	5	5	6
40°F to 49°F	3	3	4	4	5	5
30°F to 39°F	3	3	3	4	4	5
20°F to 29°F	3	3	3	3	3	4
10°F to 19°F	2	2	2	2	2	3
<10°F	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 season¹³
- 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”¹⁴ 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.

¹³ The duration of the fire season will be reviewed and defined annually.

¹⁴ 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-reclosing¹⁵ 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 not 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.

¹⁵ 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
<ul style="list-style-type: none"> 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
<ul style="list-style-type: none"> Ground Detail Inspection Program (enhanced) Wood Pole Inspection and Treatment Wood Pole Fire Protection Program (enhanced) Line Equipment Inspection Program Overhead Primary Harden Program <ul style="list-style-type: none"> 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 2nd year in RRZs and YRZs*

Tree Removals - Cycle Busters/Hazard Trees

Targeted Pole Clearing

100% Quality Assurance/Quality Control Auditing in RRZs and YRZs

*Distribution line clearing cycles vary by utility. Idaho Power has set a goal of achieving a 3-year cycle of distribution line clearing.

8.3.1. 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.

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.¹⁶ Additionally, in the RRZs and YRZs, Idaho Power completes annual vegetation line inspections and mid-cycle clearing of the lines in the second year,

¹⁶ 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.

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 crossarms

Replace steel insulator brackets with new steel pins/fiberglass crossarms

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 arresters

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

Pre-Fire Season Inspection and Mitigation

Line Clearing Cycles: Strive to maintain 3-year cycle for valley areas & 6-year cycle for mountain areas

Tree Removals - Hazard Trees

Targeted Pole Clearing

100% QA/QC Audits in RRZs and YRZs

Distribution

Pre-Fire Season Inspection and Mitigation

Line Clearing Cycle: Strive to maintain 3-year cycle

Mid-Cycle Pruning in RRZs and YRZs

Tree Removals - Cycle Busters/Hazard Trees

Targeted Pole Clearing

100% QA/QC Audits in RRZs and YRZs

Description

Perform annual pre-fire season inspections and mitigate noted "hot spots"

Complete annual cycle pruning work plan

Remove targeted hazard trees

Complete annually targeted structures

Complete annually QA/QC audits

Description

Perform annual pre-fire season inspections in RRZs and YRZs and mitigate noted "hot spots"

Complete annual cycle pruning work plan

Complete annual mid-cycle pruning work plan in RRZs and YRZs

Complete annual cycle pruning work plan

Complete annually targeted structures

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 not 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).

Fire Potential Index (FPI)	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
		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 (Tier 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 NOT 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 <https://www.oregon.gov/ODF/Fire/Pages/Restrictions.aspx> for ODF's Fire Season Requirements order.
- Other sites for reference that contain fire restriction orders include:
 - Oregon— Blue Mountain Interagency Fire Center at <http://bmidec.org/index.shtml>
 - Nevada—Fire Information at <https://www.nevadafireinfo.org/restrictions-and-closures>
 - 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 style="list-style-type: none"> 1. Be familiar with the requirements specified in this Plan and operate in accordance with this Plan. 2. Be aware of daily weather forecast and FPI level. 3. Be aware of whether field work will be performed in a WMZ.
Crew Foreman and Front-Line Leaders	<ol style="list-style-type: none"> 1. Establish expectations to direct report employees they are to be familiar with, and follow, Plan requirements. 2. Ensure the crew or team conducts field operations in accordance with this Plan. 3. Be aware of daily weather forecast and FPI level (by viewing the FPI dashboard or by calling into dispatch or a leader): <ol style="list-style-type: none"> a) Ensure employees are aware of the FPI level. b) Ensure work practices comply with this Wildland Fire Preparedness and Prevention Plan when the FPI is "Red" and the WMZ is Yellow. c) Ensure no work takes place when FPI is "Red" and the WMZ is Red. Any exceptions to be discussed with manager. 4. Ensure annual training of employees is completed prior to wildfire season. 5. Ensure required tools and equipment are in place prior to wildfire season.
Manager (Regional Operations Manager, Area Manager, T&D Construction Manager)	<ol style="list-style-type: none"> 1. Establish expectations to Crew Foremen and Front-Line Leaders they are to operate in accordance with Plan requirements. 2. Support Crew Foremen and Front-Line Leaders in scheduling training and making required tools and equipment available. 3. View daily weather forecast and FPI dashboard: <ol style="list-style-type: none"> a) Authorize any exceptions to working when FPI is "Red" and the WRZ is Red. b) Ensure specified audits are timely completed.
Meteorology Department	<ol style="list-style-type: none"> 1. Provide daily weather forecast and update the FPI dashboard contained within the IPC Enviro Viewer.
Environmental Services Department	<ol style="list-style-type: none"> 1. Monitor local, state, and federal land management agencies for any wildfire restriction orders that are issued. 2. Communicate content of any orders issues to Power Supply, COBD, and PEC operations leadership.
Operations Procurement Department	<ol style="list-style-type: none"> 1. Ensure contractors have a copy of this Plan and that contractual requirements are in place to ensure adherence to the Plan.
Vice-President of Planning, Engineering and Construction (VP of PEC)	<ol style="list-style-type: none"> 1. Ensure annual review/update of this Plan is conducted following the completion of each wildfire season.

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 Preparedness Audit Checklist:

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

December 2021

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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.

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.¹

(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.²

(5) Local Emergency Manager—Refers to a jurisdiction's role that oversees the day-to-day emergency management programs and activities.³

(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.

¹ Federal Emergency Management Institute (FEMA) National Response Framework (NRF) Emergency Support Functions (ESF) [National Response Framework | FEMA.gov](https://www.fema.gov/national-response-framework).

² FEMA definition under "Communities" (pg. 26) [National Response Framework \(fema.gov\)](https://www.fema.gov/national-response-framework).

³ FEMA definition under "Local Government" (pg. 29) [National Response Framework \(fema.gov\)](https://www.fema.gov/national-response-framework).

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:

- [Pivotal Weather Link \(pivotalweather.com/model.php\)](http://pivotalweather.com/model.php): 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.
- [Graphical Weather Link \(graphical.weather.gov/sectors/conusFireWeek.php\)](http://graphical.weather.gov/sectors/conusFireWeek.php): 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 [Fire Weather Outlook](#) 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 [Windy: Wind Map and Weather Forecast](#) and the National Weather Service National Oceanic and Atmospheric Administration's (NOAA) [Weather and Hazards Viewer](#).

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 [day-ahead](#) 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

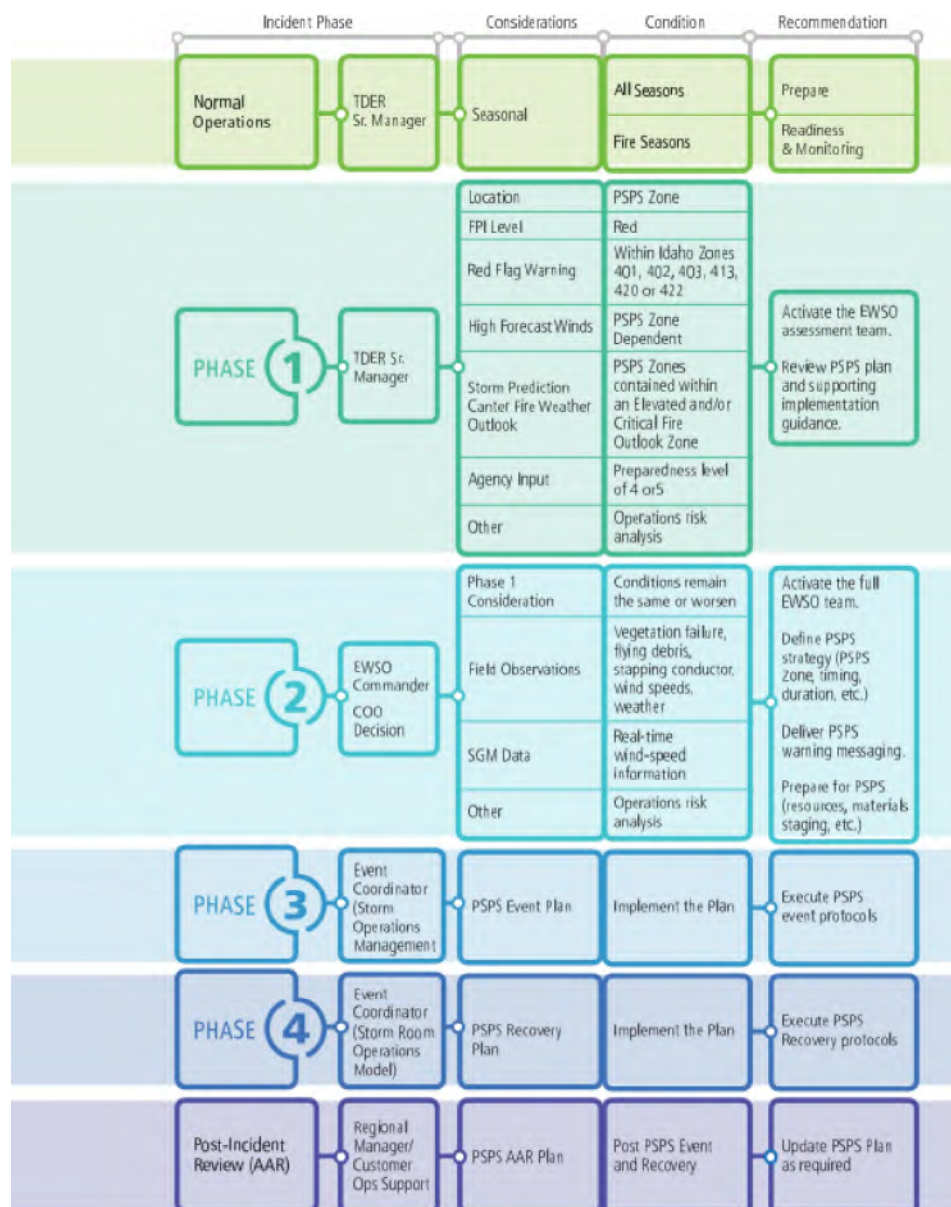
10. PSPS OPERATIONS

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 [WMP](#) 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.

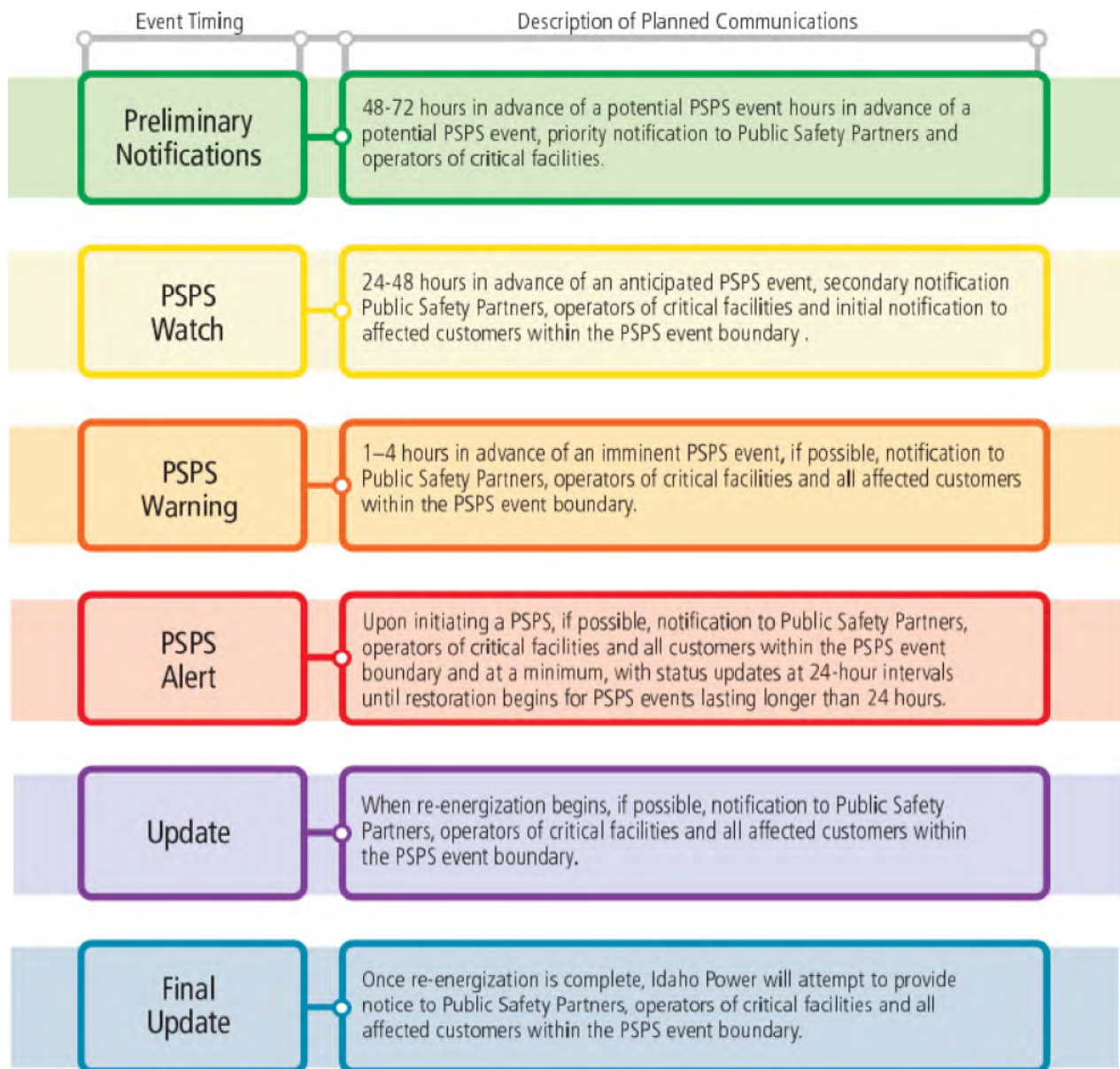


Figure 2
PSPS Event Communication Timeline

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

County	MapTaxlot	Owner	Owner2	Owner3	Address	City State	Zip	Map(s)
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
BAKER	09S40E00400	WILLIAMS LAND LLC			65579 WOLF CREEK LN	NORTH POWDER OR	97867	10
BAKER	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	09S40E2100200	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	10S41E00400	NELSON REX D & SUSAN			28509 RITTER LP	BAKER CITY OR	97814	10, 11
BAKER	10S41E00500	BROKEN SPUR RANCH LLC			30522 OLDFIELD ST	HERMISTON OR	97838	10, 11
BAKER	10S41E01900	HAT BRAND LAND & LIVESTOCKLLC			PO BOX 1003	BAKER CITY OR	97814	10, 11
BAKER	10S41E02100	BOBBIE LLC		C/O GREGORY A SACKOS TTEE	1425 CAMPBELL ST	BAKER CITY OR	97814	10, 11
BAKER	10S41E02101	BROKEN SPUR RANCH LLC			30522 OLDFIELD ST	HERMISTON OR	97838	10, 11
BAKER	10S41E02200	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	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			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	97814	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
BAKER	11S41E01002	HANCOCK TIMBERLAND X INC		C/O HANCOCK FOREST MANAGEMENT	17700 SE MILL PLAIN BLVD #180	VANCOUVER WA	98683	11
BAKER	11S41E03300	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	11, 12
BAKER	11S41E03400	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11, 12
BAKER	11S42E00200	TROY LYNDIA M ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	11
BAKER	11S42E00400	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11
BAKER	11S42E00500	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11
BAKER	11S42E00600	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11
BAKER	11S42E00700	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11
BAKER	11S42E00800	TROY LYNDIA M ETAL		C/O BINGHAMBINGHAM & WATT CPA	2055 SECOND ST	BAKER CITY OR	97814	11
BAKER	11S42E00900	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	11
BAKER	11S42E01000	M R KING RANCHES INC			PO BOX 115	DURKEE OR	97905	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			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	11S42E3100400	ASH GROVE CEMENT CO			11011 CODY	OVERLAND PARK KS	66210	12
BAKER	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	11S43E04500	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	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	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	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			FEDERAL BLDG	BAKER CITY OR	97814	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
BAKER	12S43E02900	SUITTER NATHAN H & FRANCES F			PO BOX 227	DURKEE OR	97905	13
BAKER	12S43E03000	HAAS MATHEW F & AMY K TTEE			1970 SAN JUAN RD	AROMAS CA	95004	13
BAKER	12S43E03100	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	12, 13
BAKER	12S43E03200	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	12

County	MapTaxlot	Owner	Owner2	Owner3	Address	City State	Zip	Map(s)
BAKER	12S43E03300	USA BLM			FEDERAL BLDG	BAKER CITY OR	97814	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			2411 MAIN STREET	BAKER CITY OR	97814	13
BAKER	12S44E02400	WICK LAND & CATTLE LLC			8421 S TEN MILE RD	MERIDIAN ID	83642	13
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
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	WICK RANCHES LLC			8421 S TEN MILE ROAD	MERIDIAN ID	83642	13
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	ROCHESTER MI	48306	13
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
BAKER	13S44E03000	DAVIS GARY R & LOIS A			4362 SAGE RD	ONTARIO OR	97914	14
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	ONTARIO OR	97914	14
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	14S44E00100	DAVIS GARY R & LOIS A			4362 SAGE RD	ONTARIO OR	97914	14
BAKER	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			4362 SAGE RD	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	97310	14
BAKER	14S44E02500	SJ LAND LLC			PO BOX 297	VALE OR	97918	14
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			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	BURKE WILLIAM J AFFIANT (OW)	BOKIDES PROPERTIES LLC (CP)		PO BOX 28	WEISER ID	83672	14
BAKER	14S45E02600	IDAHO POWER CO			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 INOUYESHIVELYKLATMTC		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			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	USA			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			420 ROAD 49	PASCO WA	99301	15
MALHEUR	15S45E01700	HOLTZ MANAGEMENT LLC	C/O INOUYESHIVELYKLATMTC		23282 MILL CREEK DR SUITE 200	LAGUNA HILLS CA	92653	15
MALHEUR	15S45E02400	OREGON STATE OF			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	USA			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	17S44E07000	LASTIRI FRANCISCO & MARIA			830 SIERRA ST	VALE OR	97918	17
MALHEUR	17S44E07100	MC CONNELL R WAYNE & DARLENE			PO BOX 7	VALE OR	97918	17
MALHEUR	17S44E07200	MC CONNELL ROBERT W & DARLENE			PO BOX 7	VALE OR	97918	17
MALHEUR	17S44E07500	ROBERTSON ASHLEY N ETVIR			2001 5TH AVE W	VALE OR	97918	17
MALHEUR	17S44E07600	LAMB SCOTT E & KATHERINE L			4435 S RD F	VALE OR	97918	17
MALHEUR	17S44E08400	WALTON TRACY & SHERRI			3525 MESA AVE	EMMETT ID	83617	17
MALHEUR	17S44E08600	ANTHONY EDWARD F & NANCY A			939 CLARK ST S	VALE OR	97918	17
MALHEUR	17S44E08700	ANTHONY EDWARD F & NANCY A			939 CLARK ST S	VALE OR	97918	17
MALHEUR	17S44E08800	MURREY FRANCES L			2110 6TH AVE W	VALE OR	97918	17
MALHEUR	17S44E12700	HESTER KURT ETAL			4391 S RD E	VALE OR	97918	17
MALHEUR	17S44E12800	HESTER KURT ETAL			4391 S RD E	VALE OR	97918	17
MALHEUR	17S44E12900	HESTER KURT ETAL			4391 S RD E	VALE OR	97918	17
MALHEUR	17S44E13000	BATES RYAN E & THERESA A			2139 6TH AVE W	VALE OR	97918	17
MALHEUR	17S44E13100	BATES RYAN E & THERESA A			2139 6TH AVE W	VALE OR	97918	17
MALHEUR	17S44E13300	USA			GEN DEL	WASHINGTON D C	20013	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	17S44E2200600	BAIR JEFFREY R & MARTI JO			2048 6TH AVE W	VALE OR	97918	17
MALHEUR	17S44E2200700	CHILD DALLIN E & MICHELLE D			PO BOX 262	VALE OR	97918	17
MALHEUR	17S44E2200800	BAIR JEFFREY R & MARTI JO			2048 6TH AVE W	VALE OR	97918	17
MALHEUR	17S44E2200900	BAIR MARTI J			2048 6TH AVE W	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	18S43E01390	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR	18S43E01400	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR	18S43E01400	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR	18S43E01500	USA			GEN DEL	WASHINGTON D C	20013	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			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			GEN DEL	WASHINGTON D C	20013	17
MALHEUR	18S43E02500	MC ELROY RANCHES INC		C/O MC ELROY T C JR	3760 STAGE RD	VALE OR	97918	17
MALHEUR	18S43E02600	MC ELROY RANCHES INC		C/O MC ELROY T C JR	3760 STAGE RD	VALE OR	97918	17
MALHEUR	18S43E06300	HOPP FAMILY REVOCABLE TRUST		CARL W JR & VICKIE HOPP	63421 SADDLEBACK DR	BEND OR	97703	18
MALHEUR	18S43E06400	HOPP FAMILY REVOCABLE TRUST		CARL W JR & VICKIE HOPP	63421 SADDLEBACK DR	BEND OR	97703	18
MALHEUR	18S43E06500	PALMER JAMES G & BETH E			2693 VOGUE RD	VALE OR	97918	18
MALHEUR	18S43E06500	PALMER JAMES G & BETH E			2693 VOGUE RD	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			GEN DEL	WASHINGTON D C	20013	18
MALHEUR	19S43E02200	USA			GEN DEL	WASHINGTON D C	20013	18
MALHEUR	19S43E02300	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR	19S43E02400	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR	19S43E02500	FAITH LAND CO LLC		C/O RUSSELL DECKER	22391 RAMS HORN WAY	CALDWELL ID	83607	18
MALHEUR	19S43E02600	HINTON LARRY D			PO BOX L	VALE OR	97918	18
MALHEUR	19S43E02700	PESZNECKER BROTHERS INC			PO BOX 375	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	19S44E00100	WEGNER DANIEL P TRUST ETAL		TERRY & PATTI WEGNER	2245 BISHOP RD	VALE OR	97918	18, 19
MALHEUR	19S44E00200	USA			GEN DEL	WASHINGTON D C	20013	18
MALHEUR	19S44E00400	BLAKE JONATHAN M & LACY A			3251 RUSSELL RD	VALE OR	97918	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			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	19S44E1400500	STANDAGE ENTERPRISES LLC			1825 U S 20 HWY	VALE OR	97918	19
MALHEUR	19S44E1400900	FULLETON DANIEL & MARY LYNN			3550 FULLETON RD	VALE OR	97918	19
MALHEUR	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			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	20S45E00101	SAURET CURTIS TRUST			1435 COW HOLLOW RD	NYSSA OR	97913	19, 20
MALHEUR	20S45E00200	WEGNER DANIEL P TRUST ETAL		TERRY & PATTI WEGNER	2245 BISHOP RD	VALE OR	97918	19
MALHEUR	20S45E00300	SAURET CURTIS TRUST			1435 COW HOLLOW RD	NYSSA OR	97913	19, 20
MALHEUR	20S45E00500	USA BLM VALE DISTRICT			100 OREGON ST	VALE OR	97918	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	20S45E2600600	GLENN STEVEN C & KATHLEEN			1336 OWYHEE AVE	NYSSA OR	97913	20
MALHEUR	20S45E35A00200	GLENN STEVEN C & KATHLEEN A			1336 OWYHEE AVE	NYSSA OR	97913	20
MALHEUR	20S45E35A00300	HATFIELD KENNETH A REV TRUST			PO BOX 691717	STOCKTON CA	95269	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	21S45E01000	USA			GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S45E01000	USA			GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S45E01000	USA			GEN DEL	WASHINGTON D C	20013	20
MALHEUR	21S46E03500	USA			GEN DEL	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	21S46E05601	SPIERS KEITH G & MARSHA A			1770 201 HWY	ADRIAN OR	97901	20
MALHEUR	21S46E05800	CAMERON JOHN EMERY ETAL			1835 201 HWY	ADRIAN OR	97901	20
MALHEUR	21S46E06000	SPIERS DARREN K & JENNIFER			1853 HWY 201	ADRIAN OR	97901	20
MALHEUR	21S46E06100	HESS LINDA M			35 N HASTINGS DR	NAMPA ID	83687	20
MALHEUR	21S46E06200	CAMERON JOHN EMERY ETAL			1835 HWY 201	ADRIAN OR	97901	20
MALHEUR	21S46E3400800	BEAVERS RICK LEE			1846 HWY 201	ADRIAN OR	97901	20
MALHEUR	21S46E3400900	SCHRICKE CLAYTON ETAL			1837 HWY 201	ADRIAN OR	97901	20
MALHEUR	21S46E3401200	DAVIS RICK MERLE			1842 201 HWY	ADRIAN OR	97901	20

County	MapTaxlot	Owner	Owner2	Owner3	Address	City State	Zip	Map(s)
MALHEUR	23S46E00100	USA			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	23S47E00800	USA			GEN DEL	WASHINGTON D C	20013	21
MALHEUR	23S47E0060100	SHENK ADRIAN FARM LLC		C/O DONNA MARIE SHENK	625 LONESOME RD	ADRIAN OR	97901	21
MALHEUR	23S47E0060201	SHOWALTER CHAD G & GINA E			6513 HOWARD RD	MARSING ID	83639	21
MALHEUR	23S47E0060202	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	01N26E0000000400	WILLIAM J DOHERTY RANCH LLC			70644 DOHERTY RD	LEXINGTON OR	97839	2
MORROW	01N26E0000000600	GRIEB FARMS INC			72540 ALPINE LN	LEXINGTON OR	97839	2
MORROW	01N26E0000000701	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	01N26E000001102	NORTH LEX POWER AND LAND LLC			73114 STRAWBERRY LN	LEXINGTON OR	97839	2
MORROW	01N26E000001200	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	01N26E000001301	NORTH LEX POWER AND LAND LLC			73114 STRAWBERRY LN	LEXINGTON OR	97839	2
MORROW	01N26E000001500	NORTH LEX POWER AND LAND LLC			73114 STRAWBERRY LN	LEXINGTON OR	97839	2
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 TRUSTEES			22948 FAIRVIEW LN	IONE OR	97843	2
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	01N27E0000000100	LUCIANI JOHN H			27633 BUTTERCREEK RD	ECHO OR	97826	3
MORROW	01N27E0000000101	VANBUREN FAMILY PROPERTY TRUST			32922 KAHLLOTUS HWY	PASCO WA	99301	3
MORROW	01N27E0000000102	ASHBECK ROBERT R & ASHBECK JENNIFER			69361 LITTLE BUTTER CREEK RD	ECHO OR	97826	3
MORROW	01N27E0000000103	VANBUREN FAMILY PROPERTY TRUST			32922 KAHLLOTUS HWY	PASCO WA	99301	3
MORROW	01N27E0000000104	VANBUREN FAMILY PROPERTY TRUST			32922 KAHLLOTUS HWY	PASCO WA	99301	3
MORROW	01N27E0000000107	LUCIANI JOHN H & LUCIANI KAREN S			27633 BUTTER CREEK RD	ECHO OR	97826	3
MORROW	01N27E0000000108	ASHBECK MITCHELL C & TERRY L ANN			69359 LITTLE BUTTER CREEK RD	ECHO OR	97826	3
MORROW	01N27E0000000200	BUTTERCREEK RANCHES LLC			PO BOX 487	PENDLETON OR	97801	3
MORROW	01N27E0000000300	BUTTERCREEK RANCHES LLC			PO BOX 487	PENDLETON OR	97801	3
MORROW	01N27E0000000700	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 & TERRY L ANN			69359 LITTLE BUTTER CREEK RD	ECHO OR	97826	3
MORROW	01N28E0000000400	LUCIANI JOHN H			27633 BUTTERCREEK RD	ECHO OR	97826	3
MORROW	01N28E0000000401	VANBUREN FAMILY PROPERTY TRUST			32922 KAHLLOTUS HWY	PASCO WA	99301	3

County	MapTaxlot	Owner	Owner2	Owner3	Address	City State	Zip	Map(s)
MORROW	01N28E000000500	ARCUS LLC			ONE 100TH AVE NE STE. 102	BELLEVUE WA	98004	3
MORROW	02N24E000000107	THREEMILE CANYON FARMS LLC			75906 THREEMILE RD	BOARDMAN OR	97818	1, 2
MORROW	02N24E000000200	ELLA RANCH LLC		DOHERTY RICHARD	3588 NW LEHMAN PL	BEAVERTON OR	97006	2
MORROW	02N25E000000200	USA (BOMBING RANGE)						1, 2
MORROW	02N25E000000400	KILKENNY LAND COMPANY LLC		HALE KELLY	1124 SW MYRTLE DR	PORTLAND OR	97201	2
MORROW	02N25E000000500	KILKENNY LAND COMPANY LLC		HALE KELLY	1124 SW MYRTLE DR	PORTLAND OR	97201	2
MORROW	02N25E000000600	KLINGER KENNETH MICHAEL			68280 IMMIGRANT LN	IONE OR	97843	2
MORROW	02N25E000000700	DOHERTY MATTHEW P			79972 AGNEW RD	HERMISTON OR	97838	2
MORROW	02N25E000000701	ELLA RANCH LLC		DOHERTY RICHARD	3588 NW LEHMAN PL	BEAVERTON OR	97006	2
MORROW	02N26E000000400	BAKER PRODUCE SOUTH INC			PO BOX 4063	PASCO WA	99302	1
MORROW	02N26E000000500	BAKER PRODUCE SOUTH INC			PO BOX 4063	PASCO WA	99302	1, 2
MORROW	02N26E000000501	BAKER PRODUCE SOUTH INC			PO BOX 4063	PASCO WA	99302	1
MORROW	02N26E000000600	BAKER PRODUCE SOUTH INC			PO BOX 4063	PASCO WA	99302	2
MORROW	02N26E000000603	BAKER PRODUCE SOUTH INC			PO BOX 4063	PASCO WA	99302	1, 2
MORROW	02N26E000000800	IVAR & LINA LLC			958 W CODY AVE	HERMISTON OR	97838	1, 2
MORROW	02N26E000000900	BAKER PRODUCE SOUTH INC			PO BOX 4063	PASCO WA	99302	1
MORROW	02N26E000001101	MATHENY PROPERTY LLC			74596 ALPINE LN	LEXINGTON OR	97839	2
MORROW	02N26E000001200	GRIEB FARMS INC			72540 ALPINE LN	LEXINGTON OR	97839	2
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% 55.22%		PO BOX 1186	PENDLETON OR	97801	4
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 COMPANY &	PENDLETON RANCHES INC		PO BOX 1186	PENDLETON OR	97801-0018	4
UMATILLA	1S30000001900	CUNNINGHAM SHEEP AND LAND COMPANY &	PENDLETON RANCHES INC		PO BOX 1186	PENDLETON OR	97801-0018	4
UMATILLA	1S32000006300	CLARKE VERA A (TRS) & T.J.L 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) & T.J.L 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) & T.J.L 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) & T.J.L RANCH LLC	C/O MITTENTHAL JUDITH ANN		1420 NW GILMAN BLVD SUITE 2 #2655	ISSAQUAH WA	98027-5333	5
UMATILLA	1S330000004100	FORTH TED J			41257 RIETH RD	PENDLETON OR	97801	5
UMATILLA	1S330000004100	FORTH TED J			41257 RIETH RD	PENDLETON OR	97801	5
UMATILLA	1S330000004200	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	1S330000004300	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	1S340000000200	COOKE ANTHONY			4219 SW BROADLANE AVE	PENDLETON OR	97801-4228	6
UMATILLA	1S340000000300	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S340000000301	STRANDHOLM RUSSELL J & JILL L (TRS)			4174 SW PERKINS AVE	PENDLETON OR	97801-4276	6
UMATILLA	1S340000000301	STRANDHOLM RUSSELL J & JILL L (TRS)			4174 SW PERKINS AVE	PENDLETON OR	97801-4276	6
UMATILLA	1S340000000302	ANDERSON JOHN K & REBECCA E			3327 SW LADOW AVE	PENDLETON OR	97801-3658	6
UMATILLA	1S340000000303	MANESS FRANK E ET AL			PO BOX 323	PILOT ROCK OR	97868-0323	6
UMATILLA	1S340000000305	PICARD JOHN & PICARD DAWNITA			49829 RIVER RD	PENDLETON OR	97801-9723	6
UMATILLA	1S340000000306	JOHNSON PHILIP ROY & TAMARA SUE			2724 KYLE RD	KENNEWICK WA	99338-9310	6
UMATILLA	1S340000000306	JOHNSON PHILIP ROY & TAMARA SUE			2724 KYLE RD	KENNEWICK WA	99338-9310	6
UMATILLA	1S340000000400	PARKER RODNEY S & KAREN J			70827 SW DOUGLAS DR	PENDLETON OR	97801-9497	6
UMATILLA	1S340000000500	STRANDHOLM RUSSELL J & JILL L (TRS)			PO BOX 386	PENDLETON OR	97801	6
UMATILLA	1S340000000501	PARKER RODNEY S & KAREN J			70827 SW DOUGLAS DR	PENDLETON OR	97801-9497	6
UMATILLA	1S340000000503	JOHN HANCOCK LIFE INSURANCE CO	% HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	1S340000002100	HARVEY CYNTHIA ANNE			77647 N LOOP RD	STANFIELD OR	97875-4544	6
UMATILLA	1S340000002300	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S340000002400	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801-0018	6
UMATILLA	1S340000002700	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S340000002700	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S350000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S350000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S350000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S350000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S350000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S350000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S350000000100	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S350000000300	PENDLETON RANCHES INC			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S350000001100	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S350000002800	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S350000002800	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	6
UMATILLA	1S350000005000	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	1S350000005000	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	1S350000005001	NORTHWEST PIPELINE CORP	C/O WILLIAMS CO INC AD VAL TX DEP		PO BOX 2400 MD 46-4	TULSA OK	74102	6

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	USA 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
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			PO BOX 1186	PENDLETON OR	97801	6, 7
UMATILLA	1S35000010300	STATE OF OREGON DEPT OF STATE LANDS	ASSET MANAGEMENT SECTION		775 SUMMER ST NE STE 100	SALEM OR	97301-1279	7
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 JILL			1115 NW DESPAIN AVE	PENDLETON OR	97801-1573	6
UMATILLA	1S35000010800	WHITTEN BRIAN JOE & WHITTEN GREGORY DUAN			1837 SW ATHENS AVE	PENDLETON OR	97801-4011	6
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	1S35000012200	SKILLMAN E MARGARET (LE) ETAL	C/O BRIAN SKILLMAN		38106 REITH RD	ECHO OR	97826	6
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	1S35070000500	FOX FAMILY REVOCABLE LIVING TRUST &		WHITE FAMILY TRUST	PO BOX 183	TERREBONNE OR	97760	6
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 SHIRLEY G			80240 S EDWARDS RD	HERMISTON OR	97838-6564	6
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	1S36000000800	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	SALEM OR	97302-1142	7
UMATILLA	1S36000001690	STATE OF OREGON	ODOT TECH CNTR PROP MGMT #42500		4040 FAIRVIEW INDUSTRIAL DR SE MS2	SALEM OR	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			PO BOX 1186	PENDLETON OR	97801	7
UMATILLA	1S36000002200	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	7
UMATILLA	1S36000002900	SADLER JAY ALLEN & SADLER JAMES ERNEST			25210 NE 50TH AVE	RIDGEFIELD WA	98642-8116	7
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
UMATILLA	2S30000000100	CUNNINGHAM SHEEP CO			PO BOX 1186	PENDLETON OR	97801	4
UMATILLA	2S30000000500	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	2S30000000600	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S30000000600	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S30000000680	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S30000000690	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S30000000700	CUNNINGHAM SHEEP AND LAND COMPANY &	PENDLETON RANCHES INC		PO BOX 1186	PENDLETON OR	97801-0018	4
UMATILLA	2S30000000800	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S30000000900	GURDANE LLC			PO BOX 588	OTHELLO WA	99344	4
UMATILLA	2S30000001300	CUNNINGHAM SHEEP AND LAND COMPANY &	PENDLETON RANCHES INC		PO BOX 1186	PENDLETON OR	97801-0018	4
UMATILLA	2S30000001300	CUNNINGHAM SHEEP AND LAND COMPANY &	PENDLETON RANCHES INC		PO BOX 1186	PENDLETON OR	97801-0018	4
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	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	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	2S31000001200	NEVA L HASCALL REVOCABLE TRUST ET AL			PO BOX 583	PILOT ROCK OR	97868-0583	4

County	MapTaxlot	Owner	Owner2	Owner3	Address	City State	Zip	Map(s)
UMATILLA	2S31000001200	NEVA L HASCALL REVOCABLE TRUST ET AL			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 AL			PO BOX 583	PILOT ROCK OR	97868-0583	5
UMATILLA	2S32000001702	NEVA L HASCALL REVOCABLE TRUST ET AL			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	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
UMATILLA	2S32000002400	MENTZER ANDREW NORMAN			49464 E POVERTY FLAT RD	PENDLETON OR	97801-9018	5
UMATILLA	2S32000002600	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S32000002700	USA	BUREAU OF LAND MGT		PO BOX 2965	PORTLAND OR	97208	5
UMATILLA	2S32000002800	RUPP WILLIAM F & ROSA M			420 ROAD 49	PASCO WA	99301-3040	5
UMATILLA	2S32100000100	WEINKE MARY K ET AL			PO BOX 547	PILOT ROCK OR	97868-0547	5
UMATILLA	2S32100000100	WEINKE MARY K ET AL			PO BOX 547	PILOT ROCK OR	97868-0547	5
UMATILLA	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	2S33000001000	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	2S33000001100	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	2S33000001200	RICHARDS JAMES ROBERT			62307 LEFFEL RD	LA GRANDE OR	97850	5
UMATILLA	2S33000001300	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	2S33000003300	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	2S35000000400	HANCOCK TIMBERLAND X INC	C/O HANCOCK FOREST MANAGEMENT		17700 SE MILL PLAIN BLVD STE 180	VANCOUVER WA	98683-7582	6
UMATILLA	3S32000000200	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	3S32000000500	WARNER MARK S			62284 W BIRCH CREEK RD	PILOT ROCK OR	97868-6644	5
UMATILLA	3S32000000701	NEVA L HASCALL REVOCABLE TRUST ET AL			PO BOX 583	PILOT ROCK OR	97868-0583	5
UMATILLA	3S33000000100	USA (DEPT OF AGRICULTURE)	UMATILLA NATIONAL FOREST		PO BOX 3623	PORTLAND OR	97208	5
UNION	01S35E00300	OREGON STATE OF DOT		ATTN OREGON PARKS & REC DEPT	725 SUMMER ST SUITE C	SALEM OR	97301	6

County	MapTaxlot	Owner	Owner2	Owner3	Address	City State	Zip	Map(s)
UNION	01S35E00600	JOHN HANCOCK LIFE INSURANCE CO		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	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			8809 LENOX POINT DR 3B	CHARLOTTE NC	28273	6, 7, 8
UNION	02S35E00600	GREEN DIAMOND RESOURCE COMPANY			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	02S36E00101	USA BLM			BOX	LA GRANDE OR	97850	7
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		% HANCOCK FOREST MANAGEMENT	17700 SE MILL PLN BLVD STE 180	VANCOUVER WA	98683	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	7
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			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		92280 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
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			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	02S37E03100	USA FOREST			BOX	LA GRANDE OR	97850	8
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	02S37E3101300	516 RANCH PARTNERSHIP ETAL			1904 ADAMS AVE	LA GRANDE OR	97850	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	03S37E00500	516 RANCH PARTNERSHIP ETAL			1904 ADAMS AVE	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 MANAGEMENT	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