King to Wood River (Line 433) 138 Kilovolt Transmission Line

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Bureau of Land Management
Right-of-way Grant IDI-012961

Preliminary Plan of Development

Confidential and Critical Energy Infrastructure Information – Appendix 2

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Note:
Appendix 2 has been removed from this document so that it can be shared with the public via posting on the BLM ePlanning website.

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1 INTRODUCTION

Idaho Power Company (Idaho Power or IPC) proposes to rebuild an existing 138,000 volt (138-kV) transmission line; widen the existing right-of-way (ROW) (IDI-012961) from 60-feet to 100-feet; authorize existing and proposed roads; construct and/or improve 4.12 miles of roads; and renew the ROW grant to allow for long-term operation and maintenance of the authorized facilities (Figures 1and 2). The BLM-managed lands crossed by the Proposed Action are managed by the Shoshone Field Office (SFO) and are within the Twin Falls District.

Idaho Power revised our initial application (dated September 25, 2013) to the BLM and is requesting a short-term ROW to facilitate rebuilding the transmission line. The short-term ROW would authorize pulling and tensioning sites located outside of the proposed permanent ROW. This document also supports the request for a short-term ROW.

The Plan of Development (POD) describes the proposed construction, operation and maintenance (O&M), and termination activities associated with the transmission line and roads. This document replaces any previously submitted POD. Idaho Power and the BLM have a Master Agreement (BLM-MA-ID-001) that identifies routine O&M and emergency activities. This POD provides project specific details that are not part of the Master Agreement; the POD, however, conforms to the terms of the Master Agreement. If the Master Agreement is subsequently revised, updated, or allowed to expire and the change leads to a conflict with this POD then the most recent version of the Master Agreement, signed by the Idaho BLM State Director and an Idaho Power authorized agent, takes precedence. **Activities described in this POD are typical activities and other activities may occur as part of O&M. Just because an activity is not specifically described in this POD does not mean it is not consistent with the Master Agreement.**

1.1 Purpose and Need for the Facility

The existing electrical delivery systems and infrastructure do not adequately meet the Wood River Valley's (WRV) current or future needs for dependable and adequate power. The system lacks sufficient dependability due to:

- The electrical system serving the North WRV has only one line and provides no redundancy (two separate lines that can handle extreme peak loads alone without rotational power outages).
- The Midpoint to Wood River line can handle the electrical load without the King to Wood River line, but the King to Wood River line cannot handle the load without the Midpoint to Wood River line.

Idaho Power has determined that a 138 kV transmission line will address reliability and power needs and is proposing to rebuild the existing 138 kV line with new structures and conductor. While the line is currently operating at 138 kV and will be operated at that voltage in the future, the rebuild is necessary now due to the age of the line and structures and the inadequate older conductor. Installing new conductor at the same voltage will allow for higher capacity on the line and will improve Idaho Power's ability to operate their system in that area in case the

Midpoint to Wood River line experiences an outage. The existing structures are not structurally adequate to accommodate the new conductor and will need to be replaced; therefore, just installing new conductor is not an option. The existing line has had 41 outages (average duration of approximately 7 hours) since 1996 and two-thirds of these are related to maintenance activities.

Construction would be phased over two years; this is to accommodate weather conditions, spatial and temporal restrictions, and budget requirements. Construction is planned to start in 2016 and be completed in 2017. Construction would not occur throughout the year, but would start in late spring and end in late fall each year. If there are delays in receiving approvals from the BLM and/or obtaining materials, work would start as soon as possible following receipt of all necessary approvals and materials and would be completed in two years. IPC is proposing to start work immediately following the end of timing restrictions for greater sage-grouse (June 30). IPC may start work on private lands prior to June 30.

Idaho Power currently uses existing roads and travelways that occur within and outside of the existing ROW grant. When the grant was initially issued, the BLM did not require authorization of roads; however, this is now required. Therefore, Idaho Power is requesting the BLM to include existing and proposed roads and travel ways in the amended ROW grant. This would allow for their continued use and O&M activities in accordance with BLM-MA-ID-001.

1.2 Comparison of the Proposed and Existing Facility

While the proposed line will be built to the same voltage as the existing line, there will be some differences between the existing and proposed facilities and maintenance activities.

- The existing structures are wood and the proposed structures are weathering steel.
- The proposed structures are typically 5-feet taller and the cross arms are 5-feet wider than the existing structures. The new poles (associated with each H-frame structure) will be spaced 16½-feet apart while the existing poles are spaced 13½-feet apart.
- New structures will be placed within 10-feet of existing structures except for the following:
    - Structures 15, 16, and 17. These structures were moved because the existing structure 16 was located in a pond. To accommodate the new location for structure 16, structures 15 and 17 also had to be relocated.
- New structures will be the same type of structure (e.g., replace H-frame with H-frame) as existing structures except for the following:
    - Structure 484 was a lattice structure. However, to keep the conductor from hitting in wind events, a five-pole structure will be used. This structure is located on private land.
- IPC's current practice of removing vegetation within a 10-foot radius area around each wood pole to protect the structure from wildfires will not be necessary for the steel structures.
- Some of the existing structures do not have roads to them and are accessed via overland travel for maintenance and may be viewed with binoculars or approached on foot for inspections. To facilitate construction, all structures will need vehicle access and

because the new structures are steel and cannot be climbed, vehicle access will be necessary for future maintenance activities.

- The existing structures are old and IPC has implemented minimal maintenance activities (e.g., structure replacement; crossarm replacement) in 2012 and 2013 in anticipation of rebuilding the line. If the rebuild is not possible, more extensive maintenance activities will be required. IPC anticipates maintenance on the existing line would occur regularly given the age and condition of the structures. Rebuilding the line with new steel structures will reduce the amount of future maintenance needs. The structures will be new and steel structures generally require less maintenance than wood structures.
- IPC has requested a 14-foot wide road to accommodate construction and maintenance equipment. Current roads vary in width and are typically 8 to 14-feet wide. Existing roads will be left at their existing width and only widened if safe access is not feasible.
- It is unlikely that the rounded steel crossarms will support bird nests. The wooden crossarms are more conducive to nesting although there are not extensive nests present on the line (Active and inactive nests were identified on six out of 252 structures on BLM-managed lands during 2011 surveys.).

2 ROW LOCATION

The transmission line and access routes extend over lands under the jurisdiction of the BLM (Table 1) and the State of Idaho, as well as lands in private ownership located within Blaine, Camas, and Gooding Counties. The following identified lands are incorporated into this POD and represent those portions of the transmission line, including access, which would be included within the renewed and amended ROW.

Table 1.
Long-term Encumbrances on BLM-managed Public Lands Associated with the Proposed Project

County	Width (feet)	Length (feet/miles)	Acres
Transmission Line			
Gooding	100	99,490 / 18.8	228.4
Camas	100	42,174 / 8	96.8
Blaine	100	17,763 / 3.4	40.8
Total	100	159,429 / 30.2	366
Service Roads			
Gooding	14	112,082 / 21.2	36.0
Camas	14	41,800 / 7.9	13.4
Blaine	14	18,267 / 3.5	5.9
Total	14	172,150 / 32.6	55.3

<u>Transmission Line ROW Legal Description</u>

Boise Meridian, Idaho
T. 06S., R.13E., Sec 13, SE¼SE¼.
T. 06S., R.14E., Sec 06, NE¼SE¼;
Sec 05, NW¼SW¼, SW¼NW¼, Lots 4 and 3.
T. 05S., R.14E., Sec 32, E½SW¼, NW¼SE¼, NE¼;
Sec 29, SE¼SE¼;
Sec 28, W½SW¼, S½NW¼, NE¼NW¼;

Sec 21, SE¼SW¼, E½SE¼, SW¼NE¼, E½NE¼;
Sec 22, NW¼NW¼;
Sec 15, SW¼SW¼;
Sec 10, SE¼NW¼.
T. 04S., R.14E., Sec 35, SW¼NW¼, SE¼NW¼, W½NE¼, NE ¼NE¼;
Sec 26, SE¼SE¼;
Sec 25, W½SW¼, NE¼SW¼, SW¼NE¼, E½NE¼, NE¼NE¼.
T. 04S., R.15E., Sec 30, Lot 1;
Sec 19, Lot 4, E½SW¼, NW¼SE¼, S½NE¼, NE¼NE¼;
Sec 20, NW¼NW¼;
Sec 17, S½SW¼, NE¼SW¼, NW¼SE¼, S½NE¼, NE¼NE¼;
Sec 09, S½SW¼, NE¼SW¼, SE¼NW¼, SW¼NE¼, S½NE¼, NE¼NE¼;
Sec 04, S½SE¼, NE¼SE¼, SE¼NE¼;
Sec 03, SW¼NW¼, Lot 4.
T. 03S., R.15E., Sec 34, S½SW¼, NE¼SW¼, SE¼NW¼, NE¼SW¼, E½NE¼;
Sec 27, W½E½;
Sec 22, W½E½;
Sec 15, W½SE¼, S½NE¼, NE¼NE¼;
Sec 14, NW¼NW¼;
Sec 11, W½SW¼, NE¼SW¼, E½NW¼, NW¼NE¼;
Sec 02, SE¼, SE¼NE¼;
Sec 01, SW¼NW¼, Lot 4 and 3.
T. 02S., R.16E., Sec 31, Lot 2 and 1;
Sec 30, Lot 4, E½SW¼, NW¼SE¼, S½NE¼, NE¼NE¼;
Sec 29, NW¼NW¼;
Sec 20, S½SW¼, NE¼SW¼, NW¼SE¼, S½NE¼, NE¼NE¼;
Sec 21, NW¼NW¼;
Sec 10, S½SW¼, NE¼SW¼, NW¼SE¼, S½NE¼, NE¼NE¼;
Sec 11, NW¼NW¼;
Sec 02, S½SW¼, NE¼SW¼, SE¼NW¼, SW¼NE¼, Lot 2 and 1.
T. 01S., R.16E., Sec 35, SE¼SE¼;
Sec 25, SE¼SE¼.
T. 01S., R.17E., Sec 30, Lot 3 and 4, NE¼SW¼, SW¼NW¼, E½NE¼, NE¼NE¼;
Sec 19, SE¼SE¼;
Sec 20, W½SW¼, NE¼SW¼, N½NE¼;
Sec 10, S½NE¼, NE¼NE¼;
Sec 11, NW¼NW¼;
Sec 02, S½SW¼, Lot 3.
T. 01N., R.17E., Sec 34, E½SE¼;
Sec 35, W½SW¼;
Sec 11, E½SW¼;
Sec 01, NW¼SW¼, S½NW¼, Lot 3.

<u>Service Road ROW Legal Description</u>
Boise Meridian, Idaho
T. 06S., R.13E., Sec 13, SE¼SE¼.

T. 06S., R.14E., Sec 06, NE¼SE¼;
Sec 05, NW¼SW¼, SW¼NW¼, Lots 4 and 3.
T. 05S., R.14E., Sec 32, E½SW¼, NW¼SE¼, NE¼;
Sec 29, SE¼SE¼;
Sec 28, W½SW¼, S½NW¼, NE¼NW¼;
Sec 21, SE¼SW¼, E½SE¼, SW¼NE¼, E½NE¼;
Sec 22, NW¼NW¼;
Sec 15, SW¼SW¼;
Sec 10, SE¼NW¼.
T. 04S., R.14E., Sec 35, S½NW¼, W½NE¼, NE ¼NE¼;
Sec 26, SE¼SE¼;
Sec 25, W½SW¼, NE¼SW¼, SW¼NE¼, E½NE¼, NE¼NE¼.
T. 04S., R.15E., Sec 30, Lot 1;
Sec 19, Lot 4, E½SW¼, NW¼SE¼, S½NE¼, NE¼NE¼;
Sec 20, NW¼NW¼;
Sec 17, S½SW¼, NE¼SW¼, NW¼SE¼, S½NE¼, NE¼NE¼;
Sec 09, S½SW¼, NE¼SW¼, SE¼NW¼, NE¼NE¼;
Sec 04, S½SE¼, NE¼SE¼, SE¼NE¼;
Sec 03, SW¼NW¼, Lot 4.
T. 03S., R.15E., Sec 34, S½SW¼, NE¼SW¼, SE¼NW¼, NE¼SW¼, E½NE¼;
Sec 27, W½E½;
Sec 22, W½E½;
Sec 15, W½SE¼, S½NE¼, NE¼NE¼;
Sec 14, NW¼NW¼;
Sec 11, W½SW¼, NE¼SW¼, E½NW¼, NW¼NE¼;
Sec 02, SE¼, SE¼NE¼;
Sec 01, SW¼NW¼, Lot 4 and 3.
T. 02S., R.16E., Sec 31, Lot 2 and 1;
Sec 30, Lot 4, E½SW¼, NW¼SE¼, S½NE¼, NE¼NE¼;
Sec 29, NW¼NW¼;
Sec 20, S½SW¼, NE¼SW¼, NW¼SE¼, S½NE¼, NE¼NE¼;
Sec 21, NW¼NW¼;
Sec 10, S½SW¼, NE¼SW¼, NW¼SE¼, S½NE¼, NE¼NE¼;
Sec 11, NW¼NW¼;
Sec 02, S½SW¼, NE¼SW¼, SE¼NW¼, SW¼NE¼, Lot 2 and 1.
T. 01S., R.16E., Sec 35, SE¼SE¼;
Sec 25, SE¼SE¼.
T. 01S., R.17E., Sec 30, Lot 3 and 4, NE¼SW¼, SW¼NW¼, E½NE¼, NE¼NE¼;
Sec 19, SE¼SE¼;
Sec 20, W½SW¼, NE¼SW¼, N½NE¼;
Sec 10, S½NE¼, NE¼NE¼;
Sec 11, N½NW¼;
Sec 02, S½SW¼, Lot 3.
T. 01N., R.17E., Sec 34, SE¼SE¼;
Sec 35, W½SW¼;
Sec 11, E½SW¼;

Sec 01, NW¼SW¼, S½NW¼, Lot 3.

Access Roads

US-30	E 2100 S	Canal Rd	Dead Horse Cave Rd	North Rd
S 1800 E	ID-46	City of Rocks Rd	Cottonwoods Rd	Rock Creek Rd
Poison Creek Rd	Poverty Flat Rd	Croy Creek Rd	Colorado Gulch Rd	Croesus Creek Rd

3 FACILITY DESIGN FACTORS

This section describes the various components of the transmission system for the King to Wood River rebuild. The transmission line design information is summarized in Table 2 and detailed design information and specifications are provided in Appendix 2. Appendix 2 contains Idaho Power Company Critical Energy Infrastructure Information (CEII). Distribution of this information must be limited to parties that have entered into a non-disclosure agreement with Idaho Power Company and have a need to know.

Table 2.
Design Factors for the Proposed Rebuild of the King to Wood River Transmission Line

Design Factor	Specification
Line length	Approximately 30.2 miles on BLM managed lands
Type of structure	Typically steel H-frame and three-pole structures (see Figure 4)
Structure height	Typically 70 to 80 feet tall
Span length	Variable; typically 500 to 1,000 feet; see plan and profile for specific lengths
Number of structures per mile	Avg. 8/mile; total approx. 486 structures
Right-of-way width	100 feet
Access	Primarily use existing access and service roads (see Figure 5). Some new roads will be created (see Figure 5).
Voltage	138,000
Conductor	See Appendix 2
Pole foundation depth	10 percent of pole height plus 2 feet for direct embedded.
Avian Protection	Structures will be consistent with avian protection standards as described in APLIC (2006) and Idaho Power's Avian Protection Plan.

4 GOVERNMENT AGENCIES INVOLVED

No other federal government agencies are involved in the renewal and amendment of ROW IDI-012961.

A conditional use permit will not be required from Camas or Gooding Counties. Idaho Power has obtained a Conditional Use Permit from Blaine County. For all three counties, transmission lines are permitted in all zoning districts.

Idaho Power is a regulated public utility under the laws of the State of Idaho and operates under the oversight and regulatory control of the Idaho Public Utility Commission (PUC). Under Title 61 of the Idaho PUC regulations, Idaho Power "shall furnish, provide and maintain such service, instrumentalities, equipment and facilities as shall promote the safe, health, comfort and convenience of its patrons, employees and the public, and shall be in all respects adequate, efficient, just and reasonable."

5 CONSTRUCTION OF THE FACILITIES

The design, construction, operation, and maintenance of the Project will meet or exceed the requirements of the National Electrical Safety Code (NESC), U.S. Department of Labor, Occupational Safety and Health Standards, and Idaho Power's requirements for safety and protection of landowners and their property.

5.1 Shield Wire and Fiber-Optic Cable

Each structure will have two lightning protection shield wires installed on the structure peaks. The glass fibers inside the OPGW shield wire will provide optical data transfer capability along the fiber path. Specifications are provided in Appendix 2.

Reliable and secure communications for system control and monitoring is very important to maintain the operational integrity of the Project and of the overall interconnected system. Primary communications for relaying and control will be provided via the OPGW that will be installed on the transmission line; this path is solely for Idaho Power use and will not be used for commercial purposes.

5.2 Conductors and Insulators

Conductor phase to phase and phase to ground clearance parameters are determined in accordance with the National Electrical Safety Code (NESC) ANSI C2, produced by the American National Standards Institute (ANSI). This code provides the basic clearances between the conductors and ground, crossing points of other lines and the transmission support structure, and other conductors, and the basic working clearances for personnel during energized operation and maintenance activities (IEEE 2007).

5.3 Minor Additional Hardware

In addition to the conductors, insulators, and overhead shield wires, other associated hardware will be installed on the structures as part of the insulator assembly to support the conductors and shield wires. This includes clamps, shackles, links, plates, and various other pieces. A grounding system that will consist of copper or galvanized ground rods may be embedded into the ground at the base of each structure and connected to the structure by a buried copper lead. Other hardware that is not associated with the transmission of electricity may be installed as part

of the Project. This hardware may include aerial markers on the structures denoting the structure number.

5.4 Structure Types

Idaho Power has proposed three structure types: weathering steel H-frame, weathering steel 3-pole structures, and weathering steel 5-pole structures. The majority of structures used will be steel H-frames. The 3-pole structures will be typically used at angles (i.e. where the line changes direction), crossings (i.e. rivers, highways), or other areas where the necessary line separation cannot be maintained by an H-frame structure and the 5-pole structures will be used on extremely long crossings. In addition, there are three crossings where IPC will utilize an additional pole off to the side of the structure for marker balls. New structures would be placed on the existing disturbed structure pads within 10 feet of the existing structures with three exceptions (structures 15, 16, and 17). Typical structures are shown in Figure 4. Existing and proposed structure type, above ground height, and guy wire use are provided in Table 3.

Table 3.
Existing and Proposed Structure Height, Type, and Guy Wire Use

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
3	H-FRAME	52 ft.	X	3 POLE	70 ft.	X
4	H-FRAME	66 ft.		H-FRAME	68 ft.	
5	H-FRAME	66 ft.		H-FRAME	72 ft.	
6	H-FRAME	52 ft.	X	H-FRAME	50 ft.	
7	3-POLE	57 ft.	X	3-POLE	66 ft.	X
8	H-FRAME	57 ft.	X	H-FRAME	54 ft.	
9	H-FRAME	48 ft.		H-FRAME	50 ft.	
10	H-FRAME	57 ft.		H-FRAME	59 ft.	
11	H-FRAME	66 ft.		H-FRAME	68 ft.	
12	H-FRAME	52 ft.		H-FRAME	59 ft.	
13	H-FRAME	52 ft.		H-FRAME	54 ft.	
14	H-FRAME	61 ft.		3-POLE	66 ft.	X
15	H-FRAME	66 ft.		H-FRAME	63 ft.	
16	H-FRAME	66 ft.		3-POLE	61 ft.	X
17	H-FRAME	52 ft.		3-POLE	70 ft.	X
18	H-FRAME	52 ft.		H-FRAME	68 ft.	
19	H-FRAME	57 ft.		H-FRAME	59 ft.	
20	H-FRAME	52 ft.		H-FRAME	59 ft.	
21	H-FRAME	57 ft.	X	H-FRAME	63 ft.	
22*	3-POLE	57 ft.	X	3-POLE	61 ft.	X
23*	3-POLE	57 ft.	X	3-POLE	61 ft.	X
24	H-FRAME	57 ft.	X	H-FRAME	63 ft.	
25	H-FRAME	61 ft.		H-FRAME	63 ft.	
26	H-FRAME	61 ft.		H-FRAME	54 ft.	

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
27	H-FRAME	66 ft.		H-FRAME	68 ft.	
28	H-FRAME	48 ft.		H-FRAME	59 ft.	
29	H-FRAME	57 ft.		H-FRAME	63 ft.	
30	H-FRAME	57 ft.		H-FRAME	63 ft.	
31	H-FRAME	57 ft.		H-FRAME	59 ft.	
32	H-FRAME	57 ft.		H-FRAME	54 ft.	
33	H-FRAME	57 ft.		H-FRAME	54 ft.	
34	H-FRAME	52 ft.		H-FRAME	59 ft.	
35	H-FRAME	57 ft.		H-FRAME	59 ft.	
36	H-FRAME	57 ft.		H-FRAME	63 ft.	
37	H-FRAME	52 ft.		H-FRAME	59 ft.	
38	H-FRAME	52 ft.		H-FRAME	54 ft.	
39	H-FRAME	57 ft.		H-FRAME	63 ft.	
40	H-FRAME	61 ft.		H-FRAME	68 ft.	
41	H-FRAME	52 ft.		H-FRAME	54 ft.	
42	H-FRAME	57 ft.		H-FRAME	63 ft.	
43	H-FRAME	57 ft.		H-FRAME	59 ft.	
44	H-FRAME	57 ft.		H-FRAME	54 ft.	
45	H-FRAME	48 ft.	X	3-POLE	52 ft.	X
46	H-FRAME	52 ft.		H-FRAME	54 ft.	
47	H-FRAME	57 ft.		H-FRAME	72 ft.	
48	H-FRAME	57 ft.	X	H-FRAME	61 ft.	
49	H-FRAME	48 ft.	X	H-FRAME	52 ft.	
50	H-FRAME	57 ft.		H-FRAME	59 ft.	
51	H-FRAME	61 ft.		H-FRAME	63 ft.	
52	H-FRAME	61 ft.		H-FRAME	63 ft.	
53	H-FRAME	57 ft.		H-FRAME	63 ft.	
54	H-FRAME	52 ft.		H-FRAME	63 ft.	
55	H-FRAME	57 ft.		H-FRAME	63 ft.	
56	H-FRAME	48 ft.		H-FRAME	59 ft.	
57	H-FRAME	52 ft.		H-FRAME	54 ft.	
58	H-FRAME	52 ft.		H-FRAME	54 ft.	
59	H-FRAME	57 ft.		H-FRAME	63 ft.	
60	H-FRAME	61 ft.		3-POLE	66 ft.	X
61	H-FRAME	70 ft.	X	3-POLE	70 ft.	X
62	H-FRAME	57 ft.		H-FRAME	54 ft.	
63	H-FRAME	61 ft.		H-FRAME	59 ft.	
64	H-FRAME	66 ft.		H-FRAME	72 ft.	
65	H-FRAME	66 ft.		H-FRAME	72 ft.	
66	H-FRAME	61 ft.		H-FRAME	63 ft.	
67	H-FRAME	61 ft.		H-FRAME	63 ft.	

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
68	H-FRAME	52 ft.		H-FRAME	59 ft.	
69	H-FRAME	52 ft.		H-FRAME	54 ft.	
70	H-FRAME	52 ft.		H-FRAME	54 ft.	
71	H-FRAME	57 ft.		H-FRAME	63 ft.	
72	H-FRAME	57 ft.		H-FRAME	59 ft.	
73	H-FRAME	57 ft.		H-FRAME	63 ft.	
74	H-FRAME	57 ft.		H-FRAME	59 ft.	
75	H-FRAME	57 ft.		H-FRAME	63 ft.	
76	H-FRAME	57 ft.		H-FRAME	63 ft.	
77	H-FRAME	52 ft.		H-FRAME	59 ft.	
78	H-FRAME	61 ft.		H-FRAME	63 ft.	
79	H-FRAME	57 ft.		H-FRAME	59 ft.	
80	H-FRAME	52 ft.		H-FRAME	59 ft.	
81	H-FRAME	52 ft.		H-FRAME	59 ft.	
82	H-FRAME	52 ft.		H-FRAME	54 ft.	
83	H-FRAME	61 ft.		H-FRAME	63 ft.	
84	H-FRAME	61 ft.		H-FRAME	63 ft.	
85	H-FRAME	52 ft.		H-FRAME	59 ft.	
86	H-FRAME	52 ft.		H-FRAME	59 ft.	
87	H-FRAME	52 ft.		H-FRAME	59 ft.	
88	H-FRAME	57 ft.		H-FRAME	63 ft.	
89	H-FRAME	57 ft.		H-FRAME	63 ft.	
90	H-FRAME	52 ft.		H-FRAME	63 ft.	
91	H-FRAME	52 ft.		H-FRAME	59 ft.	
92	H-FRAME	57 ft.		H-FRAME	63 ft.	
93	H-FRAME	61 ft.		H-FRAME	68 ft.	
94	H-FRAME	57 ft.		H-FRAME	63 ft.	
95	H-FRAME	52 ft.		H-FRAME	59 ft.	
96	H-FRAME	52 ft.		H-FRAME	54 ft.	
97	H-FRAME	57 ft.		H-FRAME	68 ft.	
98	H-FRAME	61 ft.		H-FRAME	63 ft.	
99	H-FRAME	52 ft.		H-FRAME	63 ft.	
100	H-FRAME	61 ft.		H-FRAME	63 ft.	
101	H-FRAME	48 ft.		3-POLE	52 ft.	X
102	H-FRAME	61 ft.		H-FRAME	59 ft.	
103	H-FRAME	48 ft.		H-FRAME	50 ft.	
104	H-FRAME	61 ft.		H-FRAME	63 ft.	
105	H-FRAME	66 ft.		H-FRAME	59 ft.	
106	H-FRAME	57 ft.		H-FRAME	59 ft.	
107	H-FRAME	66 ft.		H-FRAME	72 ft.	
108	3-POLE	66 ft.	X	3-POLE	79 ft.	X

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
109	H-FRAME	61 ft.		H-FRAME	68 ft.	
110	H-FRAME	66 ft.		H-FRAME	68 ft.	
111	H-FRAME	61 ft.		H-FRAME	63 ft.	
112	H-FRAME	66 ft.		H-FRAME	63 ft.	
113	H-FRAME	52 ft.		H-FRAME	59 ft.	
114	H-FRAME	57 ft.		H-FRAME	63 ft.	
115	H-FRAME	66 ft.		H-FRAME	63 ft.	
116	H-FRAME	61 ft.		H-FRAME	59 ft.	
117	H-FRAME	57 ft.		H-FRAME	63 ft.	
118	H-FRAME	57 ft.		H-FRAME	63 ft.	
119	H-FRAME	57 ft.		H-FRAME	59 ft.	
120	H-FRAME	57 ft.		H-FRAME	59 ft.	
121	H-FRAME	57 ft.		H-FRAME	59 ft.	
122	H-FRAME	57 ft.		H-FRAME	59 ft.	
123	H-FRAME	57 ft.	X	H-FRAME	59 ft.	
124	3-POLE	57 ft.	X	3-POLE	61 ft.	X
125	H-FRAME	61 ft.	X	H-FRAME	72 ft.	
126	3-POLE	57 ft.	X	H-FRAME	63 ft.	
127	H-FRAME	52 ft.		H-FRAME	54 ft.	
128	H-FRAME	61 ft.		H-FRAME	63 ft.	
129	H-FRAME	61 ft.		H-FRAME	54 ft.	
130	H-FRAME	52 ft.		H-FRAME	54 ft.	
131	H-FRAME	61 ft.		H-FRAME	63 ft.	
132	H-FRAME	52 ft.		H-FRAME	52 ft.	
133	H-FRAME	52 ft.	X	H-FRAME	52 ft.	
134	H-FRAME	52 ft.		H-FRAME	54 ft.	
135	H-FRAME	57 ft.		H-FRAME	59 ft.	
136	H-FRAME	57 ft.		H-FRAME	63 ft.	
137	3-POLE	57 ft.	X	3-POLE	61 ft.	X
138	3-POLE	57 ft.	X	3-POLE	61 ft.	X
139	H-FRAME	52 ft.		H-FRAME	59 ft.	
140	H-FRAME	52 ft.		H-FRAME	59 ft.	
141	3-POLE	52 ft.	X	H-FRAME	59 ft.	
142	3-POLE	57 ft.	X	H-FRAME	72 ft.	
143	H-FRAME	52 ft.		H-FRAME	59 ft.	
144	H-FRAME	57 ft.		H-FRAME	63 ft.	
145	H-FRAME	61 ft.		H-FRAME	63 ft.	
146	H-FRAME	52 ft.		H-FRAME	63 ft.	
147	H-FRAME	57 ft.		H-FRAME	59 ft.	
148	H-FRAME	52 ft.		H-FRAME	59 ft.	
149	H-FRAME	57 ft.		H-FRAME	59 ft.	

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
150	H-FRAME	57 ft.		H-FRAME	63 ft.	
151	H-FRAME	52 ft.		H-FRAME	59 ft.	
152	H-FRAME	57 ft.		H-FRAME	59 ft.	
153	H-FRAME	57 ft.		H-FRAME	59 ft.	
154	H-FRAME	57 ft.		H-FRAME	63 ft.	
155	H-FRAME	57 ft.		H-FRAME	63 ft.	
156	H-FRAME	52 ft.		H-FRAME	59 ft.	
157	H-FRAME	52 ft.		H-FRAME	59 ft.	
158	H-FRAME	52 ft.		H-FRAME	59 ft.	
159	H-FRAME	61 ft.		H-FRAME	63 ft.	
160	H-FRAME	57 ft.		H-FRAME	59 ft.	
161	H-FRAME	57 ft.		H-FRAME	63 ft.	
162	H-FRAME	52 ft.		H-FRAME	59 ft.	
163	H-FRAME	52 ft.		H-FRAME	59 ft.	
164	H-FRAME	52 ft.		H-FRAME	59 ft.	
165	H-FRAME	61 ft.		H-FRAME	63 ft.	
166	H-FRAME	57 ft.		H-FRAME	63 ft.	
167	H-FRAME	52 ft.		H-FRAME	59 ft.	
168	H-FRAME	52 ft.		H-FRAME	54 ft.	
169	H-FRAME	52 ft.		H-FRAME	59 ft.	
170	H-FRAME	61 ft.		H-FRAME	59 ft.	
171	H-FRAME	61 ft.		H-FRAME	59 ft.	
172	H-FRAME	61 ft.		H-FRAME	59 ft.	
173	3-POLE	52 ft.	X	3-POLE	57 ft.	X
174	H-FRAME	61 ft.		H-FRAME	59 ft.	
175	H-FRAME	57 ft.		H-FRAME	59 ft.	
176	H-FRAME	61 ft.		H-FRAME	68 ft.	
177	H-FRAME	57 ft.		H-FRAME	59 ft.	
178	H-FRAME	52 ft.		H-FRAME	54 ft.	
179	H-FRAME	57 ft.		H-FRAME	59 ft.	
180	H-FRAME	52 ft.		H-FRAME	54 ft.	
181	H-FRAME	52 ft.		H-FRAME	54 ft.	
182	H-FRAME	61 ft.		H-FRAME	59 ft.	
183	H-FRAME	61 ft.		H-FRAME	54 ft.	
184	H-FRAME	57 ft.		H-FRAME	59 ft.	
185	H-FRAME	52 ft.		H-FRAME	63 ft.	
186	H-FRAME	52 ft.		H-FRAME	54 ft.	
187	H-FRAME	52 ft.		H-FRAME	59 ft.	
188	H-FRAME	61 ft.		H-FRAME	59 ft.	
189	H-FRAME	61 ft.		H-FRAME	54 ft.	
190	H-FRAME	57 ft.		H-FRAME	59 ft.	

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
191	H-FRAME	52 ft.		H-FRAME	54 ft.	
192	H-FRAME	52 ft.		H-FRAME	54 ft.	
193	H-FRAME	52 ft.		H-FRAME	59 ft.	
194	H-FRAME	61 ft.		H-FRAME	59 ft.	
195	H-FRAME	57 ft.		H-FRAME	59 ft.	
196	H-FRAME	52 ft.		H-FRAME	59 ft.	
197	H-FRAME	52 ft.		H-FRAME	54 ft.	
198	H-FRAME	52 ft.		H-FRAME	59 ft.	
199	H-FRAME	61 ft.		H-FRAME	59 ft.	
200	H-FRAME	57 ft.		H-FRAME	63 ft.	
201	3-POLE	57 ft.	X	3-POLE	66 ft.	X
202	H-FRAME	57 ft.	X	H-FRAME	59 ft.	
203	H-FRAME	57 ft.		H-FRAME	63 ft.	
204	H-FRAME	57 ft.		H-FRAME	59 ft.	
205	H-FRAME	61 ft.		H-FRAME	59 ft.	
206	H-FRAME	61 ft.		H-FRAME	54 ft.	
207	H-FRAME	52 ft.		H-FRAME	54 ft.	
208	H-FRAME	52 ft.		H-FRAME	54 ft.	
209	H-FRAME	57 ft.		H-FRAME	63 ft.	
210	H-FRAME	57 ft.		H-FRAME	59 ft.	
211	H-FRAME	52 ft.		H-FRAME	54 ft.	
212	H-FRAME	52 ft.		H-FRAME	59 ft.	
213	H-FRAME	52 ft.		H-FRAME	54 ft.	
214	H-FRAME	52 ft.		H-FRAME	59 ft.	
215	H-FRAME	52 ft.		H-FRAME	54 ft.	
216	H-FRAME	52 ft.		H-FRAME	59 ft.	
217	H-FRAME	52 ft.		H-FRAME	54 ft.	
218	H-FRAME	57 ft.		H-FRAME	59 ft.	
219	H-FRAME	57 ft.		H-FRAME	59 ft.	
220	H-FRAME	52 ft.		H-FRAME	59 ft.	
221	H-FRAME	52 ft.		H-FRAME	54 ft.	
222	3-POLE	57 ft.	X	3-POLE	61 ft.	X
223	H-FRAME	52 ft.		H-FRAME	54 ft.	
224	H-FRAME	52 ft.		H-FRAME	54 ft.	
225	H-FRAME	52 ft.		H-FRAME	54 ft.	
226	H-FRAME	57 ft.		H-FRAME	59 ft.	
227	H-FRAME	61 ft.		H-FRAME	63 ft.	
228	H-FRAME	52 ft.		H-FRAME	54 ft.	
229	H-FRAME	52 ft.		H-FRAME	54 ft.	
230	H-FRAME	48 ft.		H-FRAME	54 ft.	
231	H-FRAME	57 ft.		H-FRAME	59 ft.	

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
232	H-FRAME	61 ft.		H-FRAME	59 ft.	
233	H-FRAME	57 ft.		H-FRAME	63 ft.	
234	H-FRAME	57 ft.		H-FRAME	63 ft.	
235	H-FRAME	61 ft.		H-FRAME	59 ft.	
236	3-POLE	61 ft.	X	H-FRAME	68 ft.	
237	3-POLE	57 ft.	X	H-FRAME	63 ft.	
238	H-FRAME	52 ft.		H-FRAME	59 ft.	
239	H-FRAME	61 ft.		H-FRAME	59 ft.	
240	H-FRAME	66 ft.		H-FRAME	63 ft.	
241	3-POLE	75 ft.	X	3-POLE	84 ft.	X
242	H-FRAME	75 ft.		3-POLE	79 ft.	X
243	3-POLE	75 ft.	X	3-POLE	66 ft.	X
244	3-POLE	70 ft.	X	3-POLE	61 ft.	X
245	H-FRAME	48 ft.		H-FRAME	54 ft.	
246	H-FRAME	48 ft.		H-FRAME	54 ft.	
247	H-FRAME	61 ft.		H-FRAME	59 ft.	
248	H-FRAME	61 ft.		H-FRAME	63 ft.	
249	H-FRAME	57 ft.		H-FRAME	50 ft.	
250	H-FRAME	66 ft.		H-FRAME	63 ft.	
251	H-FRAME	66 ft.		H-FRAME	63 ft.	
252	H-FRAME	48 ft.		H-FRAME	50 ft.	
253	H-FRAME	61 ft.		H-FRAME	63 ft.	
254	H-FRAME	57 ft.		H-FRAME	59 ft.	
255	H-FRAME	57 ft.		H-FRAME	63 ft.	
256	H-FRAME	66 ft.		H-FRAME	63 ft.	
257	H-FRAME	57 ft.		H-FRAME	54 ft.	
258	H-FRAME	57 ft.		H-FRAME	59 ft.	
259	H-FRAME	48 ft.		H-FRAME	50 ft.	
260	H-FRAME	52 ft.		H-FRAME	54 ft.	
261	H-FRAME	52 ft.		H-FRAME	54 ft.	
262	H-FRAME	48 ft.		H-FRAME	50 ft.	
263	H-FRAME	61 ft.		H-FRAME	68 ft.	
264	H-FRAME	52 ft.		H-FRAME	54 ft.	
265	3-POLE	57 ft.	X	3-POLE	57 ft.	X
266	3-POLE	57 ft.	X	3-POLE	61 ft.	X
267	H-FRAME	66 ft.		H-FRAME	63 ft.	
268	H-FRAME	66 ft.		H-FRAME	63 ft.	
269	H-FRAME	57 ft.		H-FRAME	59 ft.	
270	H-FRAME	61 ft.		H-FRAME	54 ft.	
271	H-FRAME	61 ft.		H-FRAME	54 ft.	
272	H-FRAME	52 ft.		H-FRAME	54 ft.	

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
273	H-FRAME	57 ft.		H-FRAME	54 ft.	
274	H-FRAME	52 ft.		H-FRAME	54 ft.	
275	H-FRAME	61 ft.		H-FRAME	59 ft.	
276	H-FRAME	61 ft.		H-FRAME	63 ft.	
277	H-FRAME	52 ft.		H-FRAME	54 ft.	
278	H-FRAME	57 ft.		H-FRAME	59 ft.	
279	H-FRAME	70 ft.	X	H-FRAME	68 ft.	
280	3-POLE	52 ft.	X	3-POLE	57 ft.	X
281	3-POLE	52 ft.	X	3-POLE	52 ft.	X
282	H-FRAME	57 ft.		H-FRAME	54 ft.	
283	H-FRAME	57 ft.		H-FRAME	54 ft.	
284	H-FRAME	52 ft.		H-FRAME	54 ft.	
285	H-FRAME	66 ft.		H-FRAME	63 ft.	
286	H-FRAME	48 ft.		H-FRAME	45 ft.	
287	H-FRAME	57 ft.		H-FRAME	63 ft.	
288	H-FRAME	57 ft.		H-FRAME	63 ft.	
289	3-POLE	52 ft.	X	3-POLE	52 ft.	X
290	H-FRAME	61 ft.		H-FRAME	63 ft.	
291	3-POLE	61 ft.	X	3-POLE	70 ft.	X
292	3-POLE	61 ft.	X	3-POLE	70 ft.	X
293	3-POLE	57 ft.	X	3-POLE	66 ft.	X
294	H-FRAME	61 ft.		H-FRAME	72 ft.	
295	H-FRAME	57 ft.		H-FRAME	59 ft.	
296	H-FRAME	57 ft.		H-FRAME	59 ft.	
297	H-FRAME	61 ft.		H-FRAME	63 ft.	
298	H-FRAME	52 ft.		H-FRAME	54 ft.	
299	H-FRAME	61 ft.		H-FRAME	63 ft.	
300	H-FRAME	52 ft.		H-FRAME	54 ft.	
301	H-FRAME	61 ft.		H-FRAME	63 ft.	
302	H-FRAME	61 ft.		H-FRAME	63 ft.	
303	H-FRAME	52 ft.		H-FRAME	54 ft.	
304	H-FRAME	52 ft.		H-FRAME	54 ft.	
305	H-FRAME	57 ft.		H-FRAME	59 ft.	
306	H-FRAME	52 ft.		H-FRAME	59 ft.	
307	H-FRAME	52 ft.		H-FRAME	59 ft.	
308	H-FRAME	57 ft.		H-FRAME	59 ft.	
309	H-FRAME	52 ft.		H-FRAME	54 ft.	
310	H-FRAME	57 ft.		H-FRAME	59 ft.	
311	H-FRAME	57 ft.		H-FRAME	59 ft.	
312	H-FRAME	61 ft.		H-FRAME	68 ft.	
313	H-FRAME	57 ft.		H-FRAME	63 ft.	

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
314	H-FRAME	57 ft.		H-FRAME	59 ft.	
315	H-FRAME	52 ft.		H-FRAME	54 ft.	
316	H-FRAME	52 ft.		H-FRAME	54 ft.	
317	H-FRAME	48 ft.		H-FRAME	50 ft.	
318	H-FRAME	57 ft.		H-FRAME	59 ft.	
319	H-FRAME	61 ft.		H-FRAME	63 ft.	
320	H-FRAME	61 ft.		H-FRAME	63 ft.	
321	H-FRAME	52 ft.		3-POLE	57 ft.	X
322	H-FRAME	61 ft.		H-FRAME	63 ft.	
323	H-FRAME	57 ft.		H-FRAME	59 ft.	
324	H-FRAME	52 ft.		H-FRAME	59 ft.	
325	H-FRAME	57 ft.		H-FRAME	59 ft.	
326	H-FRAME	52 ft.		H-FRAME	54 ft.	
327	H-FRAME	52 ft.		H-FRAME	54 ft.	
328	H-FRAME	61 ft.		H-FRAME	63 ft.	
329	H-FRAME	57 ft.		H-FRAME	59 ft.	
330	H-FRAME	57 ft.		H-FRAME	68 ft.	
331	H-FRAME	57 ft.		H-FRAME	72 ft.	
332	H-FRAME	52 ft.		H-FRAME	54 ft.	
333	H-FRAME	52 ft.		H-FRAME	54 ft.	
334	H-FRAME	52 ft.		H-FRAME	59 ft.	
335	H-FRAME	57 ft.		H-FRAME	59 ft.	
336	H-FRAME	57 ft.		H-FRAME	54 ft.	
337	H-FRAME	57 ft.		H-FRAME	59 ft.	
338	H-FRAME	61 ft.		H-FRAME	63 ft.	
339	H-FRAME	61 ft.		H-FRAME	63 ft.	
340	H-FRAME	57 ft.		H-FRAME	59 ft.	
341	H-FRAME	57 ft.		H-FRAME	59 ft.	
342	H-FRAME	57 ft.		H-FRAME	59 ft.	
343	H-FRAME	61 ft.		H-FRAME	68 ft.	
344	H-FRAME	52 ft.		H-FRAME	54 ft.	
345	H-FRAME	52 ft.		H-FRAME	50 ft.	
346*	H-FRAME	48 ft.	X	H-FRAME	54 ft.	
347*	H-FRAME	52 ft.	X	3-POLE	57 ft.	X
348	H-FRAME	57 ft.		H-FRAME	59 ft.	
349	H-FRAME	52 ft.		H-FRAME	54 ft.	
350	H-FRAME	57 ft.		H-FRAME	59 ft.	
351	H-FRAME	52 ft.		H-FRAME	59 ft.	
352	H-FRAME	57 ft.		H-FRAME	59 ft.	
353	H-FRAME	61 ft.		H-FRAME	63 ft.	
354	H-FRAME	61 ft.		H-FRAME	63 ft.	

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
355	H-FRAME	66 ft.		H-FRAME	50 ft.	
356	H-FRAME	48 ft.		H-FRAME	54 ft.	
357	H-FRAME	52 ft.		H-FRAME	54 ft.	
358	H-FRAME	57 ft.		H-FRAME	59 ft.	
359	H-FRAME	57 ft.		3-POLE	61 ft.	X
360	H-FRAME	52 ft.		3-POLE	61 ft.	X
361	H-FRAME	52 ft.		H-FRAME	54 ft.	
362	H-FRAME	52 ft.		H-FRAME	59 ft.	
363	H-FRAME	52 ft.		H-FRAME	54 ft.	
364	H-FRAME	52 ft.		H-FRAME	54 ft.	
365	H-FRAME	61 ft.		H-FRAME	63 ft.	
366	H-FRAME	52 ft.		H-FRAME	59 ft.	
367	H-FRAME	52 ft.		H-FRAME	50 ft.	
368	H-FRAME	61 ft.		H-FRAME	59 ft.	
369	H-FRAME	61 ft.		H-FRAME	63 ft.	
370	3-POLE	57 ft.	X	3-POLE	57 ft.	X
371	3-POLE	57 ft.	X	3-POLE	75 ft.	X
372	3-POLE	57 ft.	X	H-FRAME	72 ft.	
373	H-FRAME	52 ft.		H-FRAME	54 ft.	
374	H-FRAME	57 ft.		H-FRAME	63 ft.	
375	H-FRAME	52 ft.	X	H-FRAME	54 ft.	
376	3-POLE	52 ft.	X	3-POLE	66 ft.	X
377	H-FRAME	52 ft.	X	H-FRAME	54 ft.	
378	H-FRAME	57 ft.		H-FRAME	59 ft.	
379	H-FRAME	61 ft.		H-FRAME	63 ft.	
380	H-FRAME	57 ft.		H-FRAME	59 ft.	
381	H-FRAME	52 ft.		H-FRAME	54 ft.	
382	H-FRAME	43 ft.		H-FRAME	50 ft.	
383	H-FRAME	52 ft.		H-FRAME	50 ft.	
384	H-FRAME	52 ft.		H-FRAME	59 ft.	
385	H-FRAME	52 ft.		H-FRAME	54 ft.	
386	H-FRAME	66 ft.		H-FRAME	68 ft.	
387	3-POLE	43 ft.	X	3-POLE	57 ft.	X
388*	3-POLE	66 ft.	X	3-POLE	66 ft.	X
389*	3-POLE	57 ft.	X	3-POLE	66 ft.	X
390	H-FRAME	48 ft.		H-FRAME	54 ft.	
391	H-FRAME	52 ft.		H-FRAME	54 ft.	
392	H-FRAME	52 ft.		H-FRAME	59 ft.	
393	H-FRAME	52 ft.		H-FRAME	59 ft.	
394	H-FRAME	57 ft.		H-FRAME	63 ft.	
395	H-FRAME	61 ft.		H-FRAME	72 ft.	

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
396	H-FRAME	48 ft.		H-FRAME	50 ft.	
397	H-FRAME	57 ft.		H-FRAME	63 ft.	
398	H-FRAME	66 ft.		H-FRAME	77 ft.	
399	H-FRAME	57 ft.		3-POLE	52 ft.	X
400	H-FRAME	52 ft.		H-FRAME	59 ft.	
401	3-POLE	43 ft.		H-FRAME	50 ft.	
402	H-FRAME	57 ft.		H-FRAME	59 ft.	
403	H-FRAME	52 ft.		H-FRAME	54 ft.	
404	H-FRAME	48 ft.		H-FRAME	50 ft.	
405	3-POLE	48 ft.	X	3-POLE	52 ft.	X
406	3-POLE	52 ft.	X	3-POLE	52 ft.	X
407	3-POLE	52 ft.	X	3-POLE	57 ft.	X
408	3-POLE	57 ft.	X	3-POLE	66 ft.	X
409	3-POLE	61 ft.	X	3-POLE	61 ft.	X
410	H-FRAME	61 ft.		H-FRAME	54 ft.	
411	H-FRAME	52 ft.		H-FRAME	54 ft.	
412	H-FRAME	52 ft.		H-FRAME	59 ft.	
413	H-FRAME	52 ft.		H-FRAME	59 ft.	
414	H-FRAME	61 ft.		H-FRAME	63 ft.	
415	H-FRAME	57 ft.		H-FRAME	59 ft.	
416	H-FRAME	48 ft.		H-FRAME	54 ft.	
417	H-FRAME	43 ft.		H-FRAME	54 ft.	
418	H-FRAME	61 ft.		H-FRAME	63 ft.	
419	H-FRAME	52 ft.	X	H-FRAME	54 ft.	
420	3-POLE	52 ft.	X	3-POLE	61 ft.	X
421	H-FRAME	48 ft.	X	H-FRAME	54 ft.	
422	H-FRAME	66 ft.		H-FRAME	68 ft.	
423	H-FRAME	61 ft.		H-FRAME	63 ft.	
424	H-FRAME	52 ft.		H-FRAME	59 ft.	
425	H-FRAME	48 ft.	X	H-FRAME	63 ft.	
426	H-FRAME	48 ft.	X	H-FRAME	54 ft.	
427	3-POLE	48 ft.	X	3-POLE	52 ft.	X
428	3-POLE	48 ft.	X	3-POLE	48 ft.	X
429	H-FRAME	52 ft.		H-FRAME	54 ft.	
430	H-FRAME	48 ft.		H-FRAME	54 ft.	
431	H-FRAME	52 ft.		H-FRAME	59 ft.	
432	H-FRAME	48 ft.	X	H-FRAME	54 ft.	
433	H-FRAME	61 ft.		H-FRAME	63 ft.	
434	H-FRAME	57 ft.		H-FRAME	63 ft.	
435	H-FRAME	48 ft.		H-FRAME	50 ft.	
436	H-FRAME	57 ft.		H-FRAME	54 ft.	

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
437	H-FRAME	57 ft.		H-FRAME	59 ft.	
438	H-FRAME	52 ft.		H-FRAME	54 ft.	
439	H-FRAME	52 ft.		H-FRAME	54 ft.	
440	3-POLE	61 ft.	X	3-POLE	66 ft.	X
441	H-FRAME	52 ft.		H-FRAME	54 ft.	
442	H-FRAME	52 ft.		H-FRAME	54 ft.	
443	H-FRAME	57 ft.		H-FRAME	59 ft.	
444	H-FRAME	52 ft.		H-FRAME	54 ft.	
445	H-FRAME	57 ft.		H-FRAME	59 ft.	
446	H-FRAME	52 ft.		H-FRAME	54 ft.	
447	H-FRAME	52 ft.		H-FRAME	54 ft.	
448	H-FRAME	52 ft.		H-FRAME	54 ft.	
449	H-FRAME	52 ft.		H-FRAME	54 ft.	
450	H-FRAME	57 ft.		H-FRAME	63 ft.	
451	H-FRAME	57 ft.		H-FRAME	59 ft.	
452	H-FRAME	57 ft.		H-FRAME	63 ft.	
453	H-FRAME	52 ft.		H-FRAME	59 ft.	
454	H-FRAME	52 ft.		H-FRAME	54 ft.	
455	H-FRAME	52 ft.		H-FRAME	50 ft.	
456	3-POLE	52 ft.	X	3-POLE	52 ft.	X
457	H-FRAME	52 ft.		H-FRAME	54 ft.	
458	H-FRAME	52 ft.		H-FRAME	54 ft.	
459	H-FRAME	52 ft.		H-FRAME	54 ft.	
460	H-FRAME	52 ft.		H-FRAME	54 ft.	
461	H-FRAME	52 ft.		H-FRAME	59 ft.	
462	H-FRAME	52 ft.		H-FRAME	54 ft.	
463	H-FRAME	52 ft.		H-FRAME	54 ft.	
464	H-FRAME	57 ft.		H-FRAME	59 ft.	
465	3-POLE	57 ft.	X	3-POLE	66 ft.	X
466	3-POLE	57 ft.	X	3-POLE	57 ft.	X
467	3-POLE	57 ft.	X	3-POLE	66 ft.	X
468	H-FRAME	61 ft.		H-FRAME	63 ft.	
469	H-FRAME	66 ft.	X	H-FRAME	72 ft.	
470	3-POLE	57 ft.	X	3-POLE	66 ft.	X
471	3-POLE	57 ft.	X	3-POLE	57 ft.	X
472	3-POLE	52 ft.	X	3-POLE	70 ft.	X
473	H-FRAME	52 ft.	X	H-FRAME	54 ft.	
474	H-FRAME	48 ft.		H-FRAME	54 ft.	
475	H-FRAME	61 ft.		H-FRAME	68 ft.	
476	H-FRAME	61 ft.		H-FRAME	68 ft.	
477	H-FRAME	61 ft.		H-FRAME	68 ft.	

Str. No.	Original Structure Type	Original Above Ground Height	Guy Old	New Structure Type	New Above Ground Height	Guy New
478	H-FRAME	61 ft.		H-FRAME	81 ft.	
479	H-FRAME	48 ft.	X	3-POLE	57 ft.	X
480	3-POLE	48 ft.	X	3-POLE	57 ft.	X
481	3-POLE	52 ft.	X	3-POLE	61 ft.	X
482	H-FRAME	48 ft.	X	3-POLE	61 ft.	X
483	3-POLE	52 ft.	X	3-POLE	57 ft.	X
484**	Steel Tower			5-POLE	61 ft.	X
485**	5-POLE	61 ft.	X	5-POLE	70 ft.	X
486	3-POLE	66 ft.	X	3-POLE	70 ft.	X

* Denotes a crossing with an additional single pole for aerial marker balls. Marker balls will be placed at three canyon crossing and are not placed on the conductor to avoid needing to de-energize the transmission line to perform maintenance on the marker balls.

5.5 Transmission Line Construction

Idaho Power will not initiate any construction or other surface disturbing activities on public lands within the ROW until the BLM Authorized Officer issues the grant and written Notice to Proceed.

Temporary construction yards will be located on private lands; specific location(s) have not yet been determined. The yards will serve as field offices, reporting locations for workers, parking space for vehicles and equipment, and sites for temporarily marshalling of construction materials.

The construction of the transmission line will typically follow the sequence of: 1) centerline surveyed and staked; 2) access and service roads maintenance where necessary; 3) work area preparation; 4) holes excavated; 5) structures erected and installed; 6) fiber optic, conductors, and ground rods installed, 7) removal of old line and structures; and 8) site clean-up and reclamation. The number of workers and types of equipment required to construct the Project are shown in Table 4. Various phases of construction may occur at different locations throughout the construction process. This will likely require several crews operating at the same time at different locations. Construction will occur in phases over two years, starting in 2016 and concluding in 2017.

The existing transmission line will be de-energized during the rebuild. However, as a condition of the contract, the contractor must be able to re-energize the line within 24 hours of an identified need. This may result in a different sequence of activities in some areas, use of additional crews, and / or completing shorter segments than typically done. Furthermore, IPC cannot place the new structures in the exact location of the existing structures because the existing line must be able to be energized within 24 hours.

Table 4.
Estimated Personnel and Equipment[1] for Transmission Line Construction

Activity	People	Quantity of Equipment	
Survey	3	1	pickup truck
Old Line Removal	6	2	Pole cutter, crane
		3	pickup trucks
Road Construction	4	1	Bulldozers (D-8 Cat),
		1	motor graders
		1	pickup trucks
		1	water/gas trucks
Structure Steel Haul	4	1	steel haul trucks
		1	pickup trucks
		2	yard and field cranes
		1	fork lift
Structure Assembly Per crew	6	1	Truck mounted auger
		1	pickup trucks
		1	carry alls
		1	cranes (rubber tired)
		1	trucks (2 ton)
Structure Erection Per crew	5	1	cranes (60 Ton)
		1	trucks (2 ton)
		2	pickup trucks
		1	carry all
Wire Installation	10	1	wire reel trailers
		2	diesel tractors
		2	cranes (19-Ton, 30-Ton)
		1	trucks (5 ton)
		2	pickup trucks
		1	splicing trucks
		1	3-drum pullers (1 medium, 1 heavy)
		1	Single Drum Puller (large)
		1	Double bull-wheel tensioner (heavy)
		1	sagging equipment (D-8 Cat)
		1	static wire reel trailer
		1	water trucks
Wire Clean-Up	3	1	trucks
		1	pickup trucks
		1	(D-6 Cat)
Road Rehabilitation (ROW restoration)	2	1	motor graders
		1	pickup trucks

Note: Depending on schedule requirements, multiple crews may be required. Not all equipment may be used at all times or locations. This table represents typical equipment and additional equipment may be used.

Surveying

[1] Descriptions and photographs of some of the typical equipment are provided in Appendix 3.

Construction survey work for the Project consists of determining centerline location, specific pole locations, ROW boundaries, work area boundaries, and service roads to work areas. Preliminary locations of the centerline, structures, work areas, and service roads have been identified. As this is an existing ROW and the line will be rebuilt in the same ROW, it may be unnecessary to mark the boundaries. Locations where the line changes directions or the ROW is not clear may be marked with painted lath stakes or flags, as needed, to keep the contractor within the ROW. Marking will be maintained until final cleanup and/or reclamation is completed, after which markers will be removed and recycled or disposed of at a State approved landfill

Roads

Roads associated with the transmission line are defined as either service or access roads. The purpose of service roads is to provide IPC access to the transmission line. These roads would not exist if the transmission line did not exist. Access roads serve a broader purpose, such as contributing to the BLM, county, or state transportation systems. Access roads provide direct or indirect access to the transmission lines. Existing access and service roads, as shown on Figure 2, will provide access for rebuild and O&M activities.

Because Idaho Power will need to access each structure location by vehicle during construction and O&M activities, roads will need to be repaired, maintained, or created. Idaho Power crews inventoried the existing roads and identified areas where roads would be used as-is, need repair or maintenance, need to be created, or where overland travel is possible. Table 5 provides a general description of road activities and specific activities, by span, are identified in Table 6.

Table 5.
General Road Activities

Activity (Road Category)	Description
No work proposed (A)	Use existing road or travelway and no repair or maintenance necessary. Road would not be widened.
Remove rocks (B)	A backhoe would be used to move large rocks to the side. Road would not be widened.
Cut vegetation (C)	Vegetation that can interfere with safe equipment operation would be cut. Road would not be widened.
Regrade/repair - includes ground disturbing activities (D)	Grading to repair and / or restore still visible road prism; this can include repair of sloughs, widening narrow areas, and reduce slopes where necessary. Road may be widened to 14-feet.
Grade new road (E)	Create road where no road prism is evident. Road would be 14-feet wide.
Crossing (F)	Create or improve a water body crossing (e.g., install culvert or rock crossing). Crossing may be widened to 14-feet.
Overland travel (G)	Multiple vehicle trips would create a two-track that is visible in vegetated areas. Vegetation would be crushed, but would not be cut or removed. In agricultural areas, overland travel would be coordinated with the land

Activity (Road Category)	Description
	owner and would occur primarily when crops are not in place.

Note: Road category refers to categories shown on Figure 4.

Table 6.
Existing road condition and proposed road work by span.

Structure Number	Ownership	Road Category	Proposed Road Work[1]
1	Private	A	No road work proposed
2	Private	A	No road work proposed
3	Private	A	No road work proposed
4	Private	A	No road work proposed
5	Private	A	No road work proposed
6	Private	B	Remove rocks from road.
7	Private	B	Remove rocks from road.
8	Private	A	No road work proposed
9	Private	C	No road work proposed. Will remove Russian olives at land owner request so can get around field.
10	Private	F	Install 24-inch culvert before structure 10 so can cross irrigation ditch.
11	Private	F	Install 12-inch culvert between structures 11 and 12 so can cross irrigation ditch.
12	Private	F	Install 12-inch culvert between structures 12 and 13 so can cross irrigation ditch.
13	State	A	No road work proposed
14	State	A	No road work proposed
15	State	A	No road work proposed
16	State	G	Tall vegetation will be cut for safe travel and equipment operation. Location of structure 16 has been moved. Old structure is in a pond; new structure is outside of pond.
17	State	A	No road work proposed
18	Private	A	No road work proposed
19	State	A	No road work proposed
20	State	A	No road work proposed
21	State	A	No road work proposed
22	State	A	No road work proposed
23	State	B	Will need to remove rocks from cattle guard.
24	State	A	No road work proposed
25	Private	G	No road work proposed
26	Private	G	No road work proposed
27	Private	G	No road work proposed
28	Private	G	No road work proposed
29	Private	G	No road work proposed
30	Private	G	No road work proposed
31	Private	G	No road work proposed
32	Private	G	No road work proposed
33	Private	G	No road work proposed
34	Private	G	No road work proposed
35	Private	G	No road work proposed
36	Private	A	No road work proposed
37	Private	A	No road work proposed

Structure Number	Ownership	Road Category	Proposed Road Work[1]
38	Private	A	Irrigation canal between structures 38 and 39 - will drive around and not cross canal. No road work proposed.
39	Private	A	No road work proposed
40	Private	A	No road work proposed
41	BLM	A	No road work proposed
42	BLM	A	No road work proposed
43	Private	A	No road work proposed
44	Private	A	No road work proposed
45	Private	A	No road work proposed
46	Private	E	Create road. Structure is on small hillside and currently no access
47	Private	A	No road work proposed
48	Private	A	No road work proposed
49	Private	A	No road work proposed
50	Private	A	No road work proposed
51	Private	A	No road work proposed
52	Private	C	Tall vegetation will be cut for safe travel and equipment operation.
53	Private	C	Tall vegetation will be cut for safe travel and equipment operation.
54	Private	C	Tall vegetation will be cut for safe travel and equipment operation.
55	Private	G	Overland travel
56	Private	G	Overland travel
57	Private	G	Overland travel
58	Private	G	Overland travel
59	Private	G	Overland travel
60	Private	A	No road work proposed
61	Private	A	No road work proposed
62	Private	A	No road work proposed
63	Private	A	No road work proposed
64	BLM	A	No road work proposed
65	BLM	A	No road work proposed
66	BLM	A	No road work proposed
67	BLM	A	No road work proposed
68	BLM	A	No road work proposed
69	BLM	A	No road work proposed
70	BLM	A	No road work proposed
71	BLM	A	No road work proposed
72	BLM	A	No road work proposed
73	BLM	A	No road work proposed
74	BLM	A	No road work proposed
75	BLM	A	No road work proposed
76	BLM	A	No road work proposed
77	BLM	A	No road work proposed
78	BLM	A	No road work proposed
79	BLM	A	No road work proposed
80	BLM	A	No road work proposed
81	BLM	A	No road work proposed
82	BLM	A	No road work proposed
83	BLM	A	No road work proposed
84	BLM	A	No road work proposed

Structure Number	Ownership	Road Category	Proposed Road Work[1]
85	BLM	A	No road work proposed
86	BLM	A	No road work proposed
87	BLM	A	No road work proposed
88	BLM	A	No road work proposed
89	BLM	A	No road work proposed
90	BLM	A	No road work proposed
91	BLM	A	No road work proposed
92	BLM	A	No road work proposed
93	BLM	A	No road work proposed
94	BLM	A	No road work proposed
95	BLM	A	No road work proposed
96	BLM	A	No road work proposed
97	BLM	A	No road work proposed
98	BLM	A	No road work proposed
99	BLM	A	No road work proposed
100	BLM	A	No road work proposed
101	BLM	E	Will create road from structure 101 through 104. Will travel back on road and access structure 105 from other direction. Road will need to meander around rocks.
102	BLM	E	Will create road from structure 101 through 104. Will travel back on road and access structure 105 from other direction. Road will need to meander around rocks.
103	Private	E	Will create road from structure 101 through 104. Will travel back on road and access structure 105 from other direction. Road will need to meander around rocks.
104	Private	C / G	Structure 104 is on a knob and access will be difficult.
105	Private	G	No road work proposed
106	Private	G	No road work proposed
107	Private	G	No road work proposed
108	Private	G	No road work proposed
109	Private	G	No road work proposed
110	Private	G	No road work proposed
111	Private	G	No road work proposed
112	Private	G	No road work proposed
113	Private	G	No road work proposed
114	BLM	A	No road work proposed.
115	BLM	A	No road work proposed. Will go back out and access structure 116 from other direction.
116	Private	A	No road work proposed
117	Private	A	No road work proposed
118	Private	A	No road work proposed
119	Private	A	No road work proposed
120	Private	A	No road work proposed
121	Private	A	No road work proposed
122	Private	A	No road work proposed
123	Private	A	No road work proposed
124	Private	A	No road work proposed
125	Private	D	Grade existing road prism so equipment can access side of hill.
126	Private	A	No road work proposed
127	Private	A	No road work proposed
128	Private	A	No road work proposed

Structure Number	Ownership	Road Category	Proposed Road Work[1]
129	Private	A	No road work proposed
130	Private	A	No road work proposed
131	Private	A	No road work proposed
132	Private	A	No road work proposed
133	BLM	A	No road work proposed
134	BLM	A	No road work proposed
135	BLM	A	No road work proposed
136	BLM	A	No road work proposed
137	BLM	C	Tall vegetation will be cut for safe travel and equipment operation.
138	BLM	A	No road work proposed
139	BLM	C	Tall vegetation will be cut for safe travel and equipment operation.
140	BLM	A	No road work proposed
141	BLM	A	Structure 141 and 142 locations have been moved to minimize crossing Black Canyon Creek. Will use existing road and crossing.
142	BLM	A	No road work proposed
143	BLM	A	No road work proposed
144	BLM	A	No road work proposed
145	BLM	A	No road work proposed
146	BLM	A	No road work proposed
147	BLM	A	No road work proposed
148	BLM	A	No road work proposed
149	BLM	A	No road work proposed
150	BLM	A	No road work proposed
151	BLM	A	No road work proposed
152	BLM	A	No road work proposed
153	BLM	A	No road work proposed
154	BLM	A	No road work proposed
155	BLM	A	No road work proposed
156	BLM	A	No road work proposed
157	BLM	A	No road work proposed
158	BLM	A	No road work proposed
159	BLM	A	No road work proposed
160	BLM	A	No road work proposed
161	BLM	A	No road work proposed
162	BLM	A	No road work proposed
163	BLM	A	No road work proposed
164	BLM	B	Use caterpillar to get through small rock pile; approximately 75-feet.
165	BLM	A	No road work proposed
166	BLM	A	No road work proposed
167	BLM	A	No road work proposed
168	BLM	A	No road work proposed
169	BLM	A	No road work proposed
170	BLM	A	No road work proposed
171	State	A	No road work proposed
172	State	A	No road work proposed
173	State	A	No road work proposed
174	BLM	A	No road work proposed
175	BLM	A	No road work proposed

Structure Number	Ownership	Road Category	Proposed Road Work[1]
176	BLM	A	No road work proposed
177	BLM	A	No road work proposed
178	BLM	A	No road work proposed
179	BLM	A	No road work proposed
180	BLM	A	No road work proposed
181	BLM	A	No road work proposed
182	BLM	A	No road work proposed
183	BLM	A	No road work proposed
184	BLM	A	No road work proposed
185	BLM	A	No road work proposed
186	BLM	A	No road work proposed
187	BLM	A	No road work proposed
188	BLM	A	No road work proposed
189	BLM	A	No road work proposed
190	BLM	A	No road work proposed
191	BLM	A	No road work proposed
192	BLM	A	No road work proposed
193	BLM	A	No road work proposed
194	BLM	A	No road work proposed
195	BLM	A	No road work proposed
196	BLM	A	No road work proposed
197	BLM	A	No road work proposed
198	BLM	A	No road work proposed
199	BLM	D	Ditch will be filled with 3-inch minus angular rock so equipment can cross ditch created by erosion. Rock will minimize future erosion.
200	BLM	A	No road work proposed
201	BLM	B	Move rocks off road.
202	BLM	B	Move rocks off road.
203	BLM	D	Will repair ditch between structure 203 and 204 by filling with onsite material. Ditch is approximately 2.5-fet deep and 50-feet long.
204	BLM	A	No road work proposed
205	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
206	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
207	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
208	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
209	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
210	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
211	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
212	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
213	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
214	BLM	B	Existing road is rocky. No grading proposed, but will use

Structure Number	Ownership	Road Category	Proposed Road Work[1]
			a back hoe to move larger rocks to the side.
215	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
216	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
217	BLM	B	Existing road is rocky. No grading proposed, but will use a back hoe to move larger rocks to the side.
218	BLM	A	No road work proposed
219	BLM	A	No road work proposed
220	BLM	A	No road work proposed
221	BLM	A	No road work proposed
222	BLM	A	No road work proposed
223	BLM	A	No road work proposed
224	BLM	A	No road work proposed
225	BLM	A	No road work proposed
226	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
227	BLM	D	Will repair ditch between structure 226 and 227 by filling with onsite material. Ditch is approximately 2-feet deep and 20-feet long.
228	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
229	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
230	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
231	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
232	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
233	BLM	C	Will need to trim vegetation along road for safe vehicle operation. Will need to create a 40 x 60-foot landing for crane operation.
234	BLM	C	Will need to trim vegetation along road for safe vehicle operation. Will need to create a 40 x 60-foot landing for crane operation.
235	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
236	BLM	B / C	Will need to trim vegetation and remove larger rocks along road for safe vehicle operation. Will need to create a 40 x 60-foot work pad at 3-pole structure.
237	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
238	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
239	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
240	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
241	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
242	BLM	C	Will need to trim vegetation along road for safe vehicle operation. Need to create a 40 x 60-foot work pad.

Structure Number	Ownership	Road Category	Proposed Road Work[1]
243	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
244	BLM	B / C	Will need to trim vegetation along road for safe vehicle operation. Will need to move rocks.
245	BLM	B / C	Will need to trim vegetation along road for safe vehicle operation. Will need to move rocks.
246	BLM	A	No road work proposed
247	BLM	A	No road work proposed
248	State	C	Will need to trim vegetation along road for safe vehicle operation.
249	State	C	Will need to trim vegetation along road for safe vehicle operation.
250	State	C	Will need to trim vegetation along road for safe vehicle operation.
251	State	C	Will need to trim vegetation along road for safe vehicle operation.
252	State	A	No road work proposed
253	State	A	No road work proposed
254	State	A	No road work proposed
255	State	A	No road work proposed
256	BLM	A	No road work proposed
257	BLM	A	No road work proposed
258	BLM	A	No road work proposed
259	BLM	A	No road work proposed
260	BLM	A	No road work proposed
261	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
262	BLM	A	No road work proposed
263	BLM	F	Will need to create rock crossing since the bottom of the creek is very soft.
264	BLM	A	No road work proposed
265	BLM	A	No road work proposed
266	BLM	B	Move rocks off road.
267	BLM	B	Move rocks off road.
268	BLM	D / E	Will need to use an excavator to create 40 x 60-foot work pad and will create access down to structure 269.
269	BLM	D / E	Will access from structure 268. Will then go back the way came in and access other structures from bottom of the ridge.
270	BLM	A	No road work proposed
271	BLM	A	No road work proposed
272	BLM	A	No road work proposed
273	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
274	BLM	D	Will need to widen existing road for approximately 125-feet to accommodate vehicles.
275	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
276	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
277	BLM	C	Will need to trim vegetation along road for safe vehicle operation.

Structure Number	Ownership	Road Category	Proposed Road Work[1]
278	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
279	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
280	BLM	A	No road work proposed
281	BLM	C / D	Will need to grade approximately 100-feet of road from structure 281 back to the cattle guard. The existing road prism is on the side of a hill and needs to be flatter for equipment. Will need to trim vegetation along road for safe vehicle operation.
282	State	C	Will need to trim vegetation along road for safe vehicle operation.
283	State	C	Will need to trim vegetation along road for safe vehicle operation.
284	State	C	Will need to trim vegetation along road for safe vehicle operation.
285	Private	A	No road work proposed
286	Private	A	No road work proposed
287	State	C	Will need to trim vegetation along road for safe vehicle operation.
288	State	C	Will need to trim vegetation along road for safe vehicle operation.
289	State	A	No road work proposed
290	State	A	No road work proposed
291	State	D	Repair approximately 50-foot portion of existing road to structure and create 40 by 60-foot work pad.
292	State	D	Repair approximately 1,500-foot portion of existing road to structure and create 40 by 60-foot work pad.
293	BLM	A	No road work proposed
294	BLM	A	No road work proposed
295	BLM	A	No road work proposed
296	BLM	A	No road work proposed
297	BLM	A	No road work proposed
298	BLM	A	No road work proposed
299	BLM	A	No road work proposed
300	BLM	A	No road work proposed
301	BLM	A	No road work proposed
302	BLM	A	No road work proposed
303	BLM	A	No road work proposed
304	BLM	A	No road work proposed
305	BLM	A	No road work proposed
306	BLM	A	No road work proposed
307	BLM	A	No road work proposed
308	BLM	A	No road work proposed
309	BLM	A	No road work proposed
310	BLM	A	No road work proposed
311	BLM	A	No road work proposed
312	BLM	A	No road work proposed
313	BLM	A	No road work proposed
314	State	A	No road work proposed
315	State	A	No road work proposed
316	State	A	No road work proposed

Structure Number	Ownership	Road Category	Proposed Road Work[1]
317	State	A	No road work proposed
318	State	A	
319	State	A	No road work proposed
320	State	A	No road work proposed
321	State	A	No road work proposed
322	State	A	No road work proposed
323	State	A	No road work proposed
324	State	A	No road work proposed
325	State	A	No road work proposed
326	BLM	A	No road work proposed
327	BLM	A	No road work proposed
328	BLM	A	No road work proposed
329	BLM	A	No road work proposed
330	BLM	A	No road work proposed
331	BLM	A	No road work proposed
332	BLM	A	No road work proposed
333	BLM	A	No road work proposed
334	BLM	A	No road work proposed
335	BLM	A	No road work proposed
336	BLM	A	No road work proposed
337	BLM	A	No road work proposed
338	BLM	A	No road work proposed
339	BLM	A	No road work proposed
340	BLM	A	No road work proposed
341	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
342	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
343	Private	C	Will need to trim vegetation along road for safe vehicle operation.
344	Private	C	Will need to trim vegetation along road for safe vehicle operation.
345	Private	A	No road work proposed
346	Private	A	No road work proposed
347	BLM	A	No road work proposed
348	BLM	A	No road work proposed
349	BLM	A	No road work proposed
350	Private	A	No road work proposed
351	Private	A	No road work proposed
352	Private	A	No road work proposed
353	Private	A	No road work proposed
354	Private	A	No road work proposed
355	Private	A	No road work proposed
356	Private	A	No road work proposed
357	Private	A	No road work proposed
358	Private	A	No road work proposed
359	Private	A	No road work proposed
360	Private	A	No road work proposed
361	Private	A	No road work proposed
362	Private	A	No road work proposed
363	Private	A	No road work proposed
364	Private	A	No road work proposed

Structure Number	Ownership	Road Category	Proposed Road Work[1]
365	Private	A	No road work proposed
366	Private	A	No road work proposed
367	Private	A	No road work proposed
368	Private	A	No road work proposed
369	Private	A	No road work proposed
370	Private	F	Install rock crossing in creek between 370 and 371.
371	BLM	A	No road work proposed
372	BLM	A	No road work proposed
373	BLM	A	No road work proposed
374	BLM	A	No road work proposed
375	BLM	A	No road work proposed
376	BLM	A	No road work proposed
377	BLM	A	No road work proposed
378	BLM	A	No road work proposed
379	State	A	No road work proposed
380	State	A	No road work proposed
381	BLM	A	No road work proposed. Will need to move rocks for work pad.
382	BLM	A	No road work proposed
383	BLM	A	No road work proposed
384	BLM	A	No road work proposed
385	BLM	A	No road work proposed
386	BLM	A	No road work proposed
387	BLM	A	No road work proposed
388	Private	A	No road work proposed
389	Private	A	No road work proposed
390	Private	A	No road work proposed. Will need to create 40 x 60-foot work pad.
391	Private	A	No road work proposed. Will need to create 40 x 60-foot work pad.
392	Private	A	No road work proposed
393	Private	A	No road work proposed. Will need to create 40 x 60-foot work pad.
394	Private	E	Create approximately 600-foot long road to structure and 40 x 60 work pad.
395	Private	A	No road work proposed. Will need to create 30 x 40 work pad.
396	Private	E	Create approximately 600-foot long road to structure and 40 x 60 work pad.
397	Private	E	Create approximately 600-foot long road to structure and 40 x 60 work pad.
398	Private	E	Create approximately 600-foot long road to structure and 40 x 60 work pad.
399	Private	E	Create approximately 600-foot long road to structure and 40 x 60 work pad.
400	Private	E	Create approximately 600-foot long road to structure and 40 x 60 work pad.
401	Private	E	Create approximately 600-foot long road to structure and 40 x 60 work pad.
402	Private	E	Create approximately 600-foot long road to structure and 40 x 60 work pad.
403	Private	A	No road work proposed. Will need to create 40 x 60-foot

Structure Number	Ownership	Road Category	Proposed Road Work[1]
			work pad.
404	Private	A	No road work proposed
405	Private	A	No road work proposed. Will need to create 40 x 60-foot work pad.
406	Private	E	Create approximately 1,000-foot long road in ROW to structure and 40 x 60 work pad.
407	Private	E	Create approximately 1,500-foot long road in ROW to structure.
408	Private	E	Create approximately 1,500-foot long road in ROW to structure.
409	Private	E	Create approximately 1,500-foot long road in ROW to structure.
410	Private	A	No road work proposed
411	Private	A	No road work proposed
412	Private	A	No road work proposed
413	Private	A	No road work proposed
414	Private	A	No road work proposed. Will need to create 40 x 60-foot work pad.
415	Private	A	No road work proposed
416	Private	A	Create approximately 1,000-foot long road to structure and 40 x 60 work pad.
417	BLM	G	No road work proposed. Will need to create 40 x 60-foot work pad.
418	BLM	E	No road work proposed. Will need to create 40 x 60-foot work pad.
419	BLM	A	No road work proposed. Will need to create 40 x 60-foot work pad.
420	BLM	C	Will need to trim vegetation along road for safe vehicle operation.
421	Private	E	Create road from 421 to 423 and 40 x 60 work pad at structure 421.
422	Private	E	
423	Private	E	
424	Private	G	Overland travel.
425	Private	G	Overland travel.
426	Private	G	Overland travel.
427	Private	A	No road work proposed.
428	BLM	D	Grade and repair existing road prism.
429	BLM	A	No road work proposed. Will need to create 40 x 60-foot work pad.
430	BLM	A	No road work proposed. Will need to create 40 x 60-foot work pad.
431	BLM	A	No road work proposed. Will need to create 40 x 60-foot work pad.
432	BLM	A	No road work proposed. Will need to create 40 x 60-foot work pad.
433	BLM	D	Will need to create 30 x 40-foot work pad.
434	BLM	E	Create road between 434 and 435 in ROW. Current road loops around and proposed road is more direct path. Will rehabilitate abandoned road. Will need to create 40 x 60 work pad.
435	BLM	A	Will need to create 30 x 40 work pad.

Structure Number	Ownership	Road Category	Proposed Road Work[1]
436	State	A	No road work proposed
437	State	A	No road work proposed
438	State	A	No road work proposed
439	State	A	No road work proposed
440	Private	A	No road work proposed
441	Private	A	No road work proposed
442	Private	A	No road work proposed
443	Private	A	No road work proposed
444	Private	A	No road work proposed
445	Private	A	No road work proposed
446	Private	A	No road work proposed
447	Private	A	No road work proposed
448	Private	A	No road work proposed
449	Private	A	No road work proposed
450	Private	A	No road work proposed
451	Private	A	No road work proposed
452	Private	A	No road work proposed
453	Private	A	No road work proposed
454	Private	A	No road work proposed
455	Private	A	No road work proposed
456	Private	A	No road work proposed
457	Private	A	No road work proposed
458	Private	A	No road work proposed
459	Private	A	No road work proposed
460	Private	A	No road work proposed
461	Private	A	No road work proposed
462	Private	A	No road work proposed
463	Private	A	No road work proposed
464	Private	A	No road work proposed
465	Private	A	No road work proposed
466	Private	E	Create new road. Will need to create 40 x 60-foot work pad.
467	Private	A	No road work proposed
468	Private	A	Will need to create 40 x 60-foot work pad.
469	Private	A	Will need to create 40 x 60-foot work pad.
470	Private	A	No road work proposed
471	Private	E	Create new road. Will need to create 40 x 60-foot work pad.
472	Private	A	No road work proposed
473	Private	A	No road work proposed
474	Private	A	No road work proposed
475	Private	A	No road work proposed
476	Private	A	No road work proposed. Repair existing landing.
477	Private	D	Fill erosional ditch with existing materials.
478	Private	A	No road work proposed
479	Private	D	From structure 479 - 484, widen road and flatten side slopes where necessary.
480	Private	A	No road work proposed. Will need to create 40 x 60-foot work pad.
481	Private	A	No road work proposed. Will need to create 40 x 60-foot work pad.
482	Private	D	Repair existing road. Will need to create 40 x 60-foot

Structure Number	Ownership	Road Category	Proposed Road Work[1]
			work pad.
483	Private	A	No road work proposed. Will need to create 40 x 60-foot work pad.
484	Private	A	No road work proposed
485	Private	A	No road work proposed
486	Private	A	No road work proposed

1. Proposed road work is from the structure looking forward unless otherwise noted. For example, road work listed for structure 1 is for the span between structures 1 and 2.

Removal of Old Line

The existing line, located on wood poles, will be removed in segments following construction of the new line. All existing conductor and associated hardware will be removed and existing wood poles will be cut off near ground level. All materials will be salvaged or removed to a State-approved landfill.

Work Area Preparation

Work areas around the structure locations will be cleared of vegetation and graded only to the extent necessary to allow for safe installation of the structure. Because of ongoing vegetation maintenance (removal of vegetation within a 10-foot radius of each pole) to protect wood poles from wild fires, most existing structures do not have large amounts of vegetation immediately adjacent to the structure or within the immediate work area. Therefore, vegetation removal is expected to be minimal. Work associated with structure replacement will be primarily confined to the previously disturbed work pad. Structures that will require the creation of a work pad are identified in Table 6. Equipment to create the work pad could include a small bulldozer, backhoe, and / or excavator, depending on the specific location. Work pads will be created in areas where a flat landing is necessary for set-up and operation of construction equipment.

Setting Structures

Structures will be directly embedded in the ground. Excavations for all structures will be done with a vehicle-mounted power auger. It is likely that the majority of holes will require blasting due to the rocky nature of the area. Blasting will be conducted in strict compliance with all applicable safety orders and/or rules. All employees engaged in the handling and use of explosives will have the appropriate certification required by the state or county in which such operation is located. Accurate accounting of all explosives will be maintained, and any shortages would be reported immediately to Idaho Power and the county sheriff. No explosives will be stored in the ROW; they will be stored at Idaho Power's material storage yard. The magazines (used to store explosives) and site will meet all Federal requirements. Safeguards such as blasting mats will be employed when needed to protect adjacent property.

The most important factors that determine whether blasting is necessary is the geology of the area and the hardness of the rock. Idaho Power would employ controlled blasting procedures in order to maintain airblast, overpressure, and peak particle velocity (PPV) of ground vibrations, and to minimize stressing and fracturing of the rock beyond the limits of excavation.

Implementing controlled blasting limits the physical breaking or cracking of the rock to a localized area around each blast hole and is not expected to extend PPV beyond the site

boundary (blast location). This disturbance usually only occurs within a few meters of the blast hole. Holes are drilled in the rock with pneumatic drills to allow insertion of an explosive charge. Holes are drilled in a pre-determined pattern in order to control the blast and fly-rock as appropriate. Explosive charges are then "decked" within a bore hole. In this procedure, multiple charges are included in one hole separated by a non-explosive material. A longer delay is used for the lower charge than for the upper charge, causing the upper charge to detonate first, followed by the lower charges. In effect, decking produces results similar to time delays. As a result, overpressure levels are lower than if both charges were combined as a single shot.

When controlled blasting methods are used to excavate structure locations, the drilling and blasting work is much more technical than imagined by casual observers. The blasts are barely audible “whumps” to audible “booms”. Moreover, the scale of blasting and size of charges are much smaller than those typically used in production mining. Tests on charges and drill patterns determine the appropriate combination of explosive charge and drill pattern for a particular geologic area that will provide adequate fracturing of the rock, and appropriate control of air blast, vibrations, and fly-rock. It is estimated that the charge would be no smaller than 0.25 pound delay and no larger than 1 pound per delay with a time between delays no faster than 25 ms, and as slow as 300 ms.

Another consideration of the shock wave generated during a controlled blast is the direction of the explosive's detonation. When the first (upper) explosive detonates within the borehole it causes the rock in the immediate vicinity to crack or distort thus allowing for the shockwave and pressure of the next detonation to be release upward. As the series of detonations continue down the boring the pressure continues to propagate up the explosive column toward the surface. Less shock energy is transmitted radially and only a small percentage of shock disturbance emanates opposite the detonation direction. However, as with any blasting technique, there is always some energy left over and this is converted into vibration that travels away from the blast area through both the ground and air. Outside the immediate vicinity of the blast site permanent deformation does not occur. As the vibration travels away from the blast area the level rapidly reduces. Controlled blasting typically does not generate ground vibrations that are perceptible beyond, at most, a few meters from the blast location..

Structure holes that will be left open or unguarded overnight or for more than a day will be covered and/or fenced to protect the public, livestock, and wildlife. Soil removed from holes will be stockpiled in the work area and used to backfill holes. All remaining soil not needed for backfilling will be spread in the work area. If native soil is not suitable for backfill, clean, noxious weed free soil will be imported to backfill holes.

Pulling and Tensioning Locations

Pulling and tensioning sites (Figure 4; Table 7) for the conductor are required approximately every five miles along the ROW and at angle points. This POD includes more sites than will be used to provide flexibility to the contractor; contractors may pull one or two spools at a time and this affects the site location. IPC anticipates that approximately one-third to half of the identified pulling and tensioning sites will be used. The majority of work will be conducted within the requested 100-foot wide ROW. However, some pulling and tensioning activities will need to be located outside of the ROW. Pulling and tensioning must occur in line; therefore, equipment for tangent structures will primarily be located within the ROW. At angle and some dead-end

pulling sites, IPC will need to be back at a 4 to 1 slope from the attachment point on the structure (i.e. For a 50-foot tall pole, equipment would need to be located 200-feet away), so we will need a short-term ROW for construction activities. Equipment used for pulling and tensioning will create ground disturbance as they are driven to the site and located in the correct position. Some grading may be necessary to create a flat work pad for the equipment.

Table 7.
Proposed Conductor Pulling and Tensioning Sites

Conductor Pulling Site	Alternative 1 Structure No.	Alternative 2 Structure No.
1	3	3
2	16	44
3	60	88
4	101	130
5	138	170
6	173	215
7	201	256
8	243	297
9	281	340
10	321	383
11	360	423
12	399	465
13	428	483
14	465	Wood River Substation
15	Wood River Substation	

Conductor and Fiber Optic Installation

Similar to installation of the conductor, fiber optic and shield wire would be strung using powered pulling equipment at one end and powered braking or tensioning equipment at the other end. Once structures are in place, a pilot line would be pulled (strung) from pole to pole and threaded through stringing sheaves on each pole. A larger diameter, stronger line would then be attached to the pilot line and strung. This is called the pulling line. This process is repeated until the fiber optic cable and shield wire is pulled through all sheaves.

Not all shield wire and fiber optic pulling and tensioning sites would be used (Table 8). Two alternatives are presented because they reflect the methods that are typically used when pulling and tensioning shield wire and fiber optic cable; contractors may pull one or two spools of shield wire or fiber optic at a time. Because spool lengths are different between conductors and shield wires and fiber optic, it is not always possible to use the same locations used for pulling and tensioning conductors.

Splice boxes for the fiber optic cable will be required approximately every four miles, where the cable spool ends. The boxes will measure approximately 36” x 48” x 36” and will be mounted on the side of the pole approximately 20 feet above the ground.

Table 8
Proposed Shield Wire and Fiber Optic Pulling and Tensioning Sites

Shield Wire / Fiber Optic Pulling Site	Alternative 1 Structure No.	Alternative 2 Structure No.
1	3	3
2	22	34
3	44	70
4	68	104
5	87	135
6	105	165
7	124	199
8	141	233
9	157	265
10	173	295
11	201	329
12	217	363
13	241	396
14	265	426
15	293	462
16	312	484
17	332	485
18	360	Wood River Sub
19	388	
20	409	
21	428	
22	447	
23	470	
24	Wood River Sub	

Traffic Control and Road Restrictions

Due to the remoteness of the Project, most areas of the line will not require traffic control or road restrictions. Guard structures will be installed as needed to insure the safety of construction personnel and the public during construction at major road crossings. Guard structures consist of H-frame poles placed on either side of an obstacle. These structures prevent ground wire, conductor, or equipment from falling on an object. Equipment for erecting guard structures includes augers, line trucks, pole trailers, and cranes. Guard structures may not be required for small roads. On such occasions, other safety measures such as barriers, flagmen, or other traffic control will be used. At major intersections it may also be necessary at times to restrict traffic. Traffic control can include restriction of traffic to one lane as well as limited road closures. The closures will only be for the amount of time needed to perform the construction tasks requiring the road restrictions. Prior notice will be given for any extended delay or road blockage. The road restrictions will be managed according to the Manual of Uniform Traffic Control Devices.

Construction Waste Disposal and Cleanup

Work areas will be kept in an orderly condition throughout the construction period. Refuse and trash will be removed from the sites and disposed in an approved manner. Oils and fuels will not be dumped along the line onto the ground or into streams. Oils or chemicals will be containerized and disposed in an approved and licensed facility for disposal. Construction practices shall comply with all applicable federal, state, and local laws and regulations

concerning the use, storage, transportation and disposal of hazardous materials. No open burning of construction trash will occur.

6 RESOURCE VALUES AND ENVIRONMENTAL CONCERNS

6.1 Cultural Resources

An intensive (Class III) survey was completed in 2011 for the existing right-of-way on BLM administered lands (Gray and Statham 2012). An inventory of private lands (where access was granted), access roads, and pulling and tensioning sites located outside of the existing right-of-way was conducted in 2014 (Gray and Statham 2015). A search of Idaho State Historic Preservation Office files indicates that 73 archaeological and historic sites had previously been recorded within a half mile of the project area. The sites were dominated by historic period sites, including the Goodale Trail, ditches and canals, railroad grades, etc., as well as prehistoric lithic scatters. Condition of the sites is variable, ranging from excellent to heavily damaged from a variety of impacts.

A total of 25 sites were recorded or rerecorded during the 2011 and 2014 surveys. This includes five prehistoric lithic scatters, three multi-component lithic/trash scatters, two trash scatters/dumps, four ditches/canals, two railroad grades, a bridge, the Goodale Trail, a historic road (Democrat Gulch Road), a concrete batch plant, a rock wall, two prospects, a homestead/mining camp, and a transmission line (Line 433 itself).

Of these 25 sites, ten are considered eligible to the National Register of Historic Places: the Y-Canal (47-017630); the Z-canal (47-017628); the Goodale Trail (10BN885); the Oregon Short Line Railroad (10GG493); the Union Pacific Railroad, Hill City Branch (10CM263); Democrat Gulch Road (13-16421); the two prospect sites (433-68-01 and 433-71-02); one of the dumps (433-69-01); and, the homestead/mining camp site (433-71-01). There are no structures located within any of these sites, and they are all spanned by the transmission line. This indicates only minimal impacts from the line to the site's setting, which have been in place for 50 years. Existing access roads, however, pass through sites 10BN885, 433-69-01, 433-68-01, 433-71-01. These roads are the only project related impacts to the sites and are an existing condition.

6.2 Sensitive Plant and Wildlife Species

6.2.1 Vegetation Community and Sensitive Plant Species

Vegetation community descriptions are based on 2011 and 2014 field surveys. Prior to conducting the field surveys, URS and Idaho Power consulted with the BLM on survey methods, potentially occurring sensitive species, and noxious weeds that may occur in the project area. Methods and results are described in detail in *King to Ketchum Transmission Line (Right-of-Way Grant IDI-012919) Wildlife, Plant, and Noxious Weed Terrestrial Visual Encounter Survey Report* (URS 2011) and *King to Wood River (ROW IDI-012919) Wildlife, Plant, and Noxious Weed Report Addendum* (IPC 2014). Surveys targeted special status plants (SSPs), noxious weeds, and special status wildlife (SSW).

The ROW falls within the Owyhee Uplands section of the Intermountain Semi-Desert Province and the Challis Volcanic Section of the Middle Rocky Mountain Steppe-Coniferous Forest-Alpine Meadow Province (USFS and BLM, no date). The general habitat in the ROW is a mix of sagebrush shrubland communities with perennial bunchgrass understories in the north and annual grass understories in the south, as well as wetland, riparian, agriculture, perennial and annual grasslands, and rocky outcrop areas interspersed throughout. The ROW crosses Camas Creek where basalt cliffs tower over the perennial creek on the western edge of the Magic Reservoir. The elevation range for the ROW is approximately 3,320 to 5,980 feet above sea level. The ROW varied from gently rolling to steep slopes with signs of light to heavy grazing and past wildfire activity. Other anthropogenic disturbances included all-terrain-vehicle use, power lines, adjacent roads and residential areas, and Highways 20, 26, 46, and 75.

North Section

The northern section of the project area, which extends southward approximately 20 miles from the northernmost point of the ROW north of Hailey, is characterized as rolling to steep foothill slopes with occasional cliffs and bedrock outcrops. This section occurs at an elevation of 4,898 to 5,980 feet. Vegetation communities are mostly comprised of mountain big sagebrush shrublands with perennial bunchgrass understories. Bluebunch wheatgrass, western wheatgrass, Thurber's needlegrass, Sandberg bluegrass, and bottlebrush squirreltail are the dominant perennial bunchgrasses in the mountain big sagebrush shrublands in this section. Soils within mountain big sagebrush shrublands are typically deeper loam than in other communities and are often overlain with gravel. Antelope bitterbrush often comprised the dominant overstory shrub species . A mosaic of lesser amounts of other vegetation communities includes low sagebrush and/or alkali sagebrush with Sandberg bluegrass and bottlebrush squirreltail understories, particularly in shallower, gravelly soils. Basin big sagebrush shrubland with an understory of basin wildrye and Louisiana sagewort is present in lower areas with greater moisture availability. Invasive annuals such as cheatgrass, bulbous bluegrass, and field brome are present in the sagebrush shrublands, becoming more prevalent in areas disturbed by livestock grazing or having experienced low-intensity fire. A sparsely vegetated antelope bitterbrush and rubber rabbitbrush community with a perennial grass understory is present on a ridge with shallow rocky soils. Patches of alkali sagebrush shrubland are present in boulder-rich areas.

Two small riparian areas occur within the northern section, the first occurring in a dry wash characterized by scattered black cottonwood, Douglas-fir, Pacific willow, and Woods' rose with a mesic graminoid understory. The second riparian area occurs along a narrow tributary to Rock Creek, with scattered quaking aspen and Pacific willow. The riparian area contains a mixed understory of Woods' rose, coyote willow, and mesic graminoids and forbs, including Canada thistle and diffuse knapweed. A basalt outcrop area near a cliff is dominated by Saskatoon serviceberry with an understory of various perennial forbs and grasses.

The majority of the northern section has existing access roads that occur in or adjacent to the existing ROW and connect to service roads. All roads have gravel and cobble sized substrate, but rarely is any larger substrate present. Previously graded areas in the northern portion are typically dominated by graminoids such as bulbous bluegrass, cheatgrass, Sandberg's bluegrass, and some western wheatgrass.

The southern half of the northern section is accessed by the well maintained gravel roads Rock Creek, Poverty Flat, and Poison Creek. Service roads off of the maintained gravel roads in this section have limited vegetation in them. The most abundant species in service roads in this portion are field brome, cheat grass, and bulbous bluegrass. Shrub encroachment is very limited in the roads, although they are fairly common outside of two-tracks.

Central Section

The central section of the project area begins just south of Highway 20 near Camas Creek and extends southward approximately 20 miles. The central section is characterized as flat or gently rolling intermountain valleys with occasional basalt cliffs. The elevation range of this section is between 4,189 and 5,839 feet. Vegetation communities are predominantly a mosaic of different species of sagebrush shrublands with a bunchgrass understory. Soil is often loam that varies from sandy clay loam, sandy loam, clay loam, to silty clay loam, often overlain with basalt gravel and boulders. . Alkali sagebrush is well represented and typically has an understory of Idaho fescue and Sandberg bluegrass. Low sagebrush with a Sandberg bluegrass understory is also very common. Mountain big sagebrush with a bluebunch wheatgrass and/or Sandberg bluegrass understory and basin big sagebrush, often with antelope bitterbrush and a bluebunch wheatgrass understory, are also common. Smaller patches of fuzzy sagebrush shrublands are present.

In the southernmost part of the central section, relatively large expanses of Wyoming big sagebrush shrublands with a Sandberg bluegrass and weedy non-native grasses understory, such as bulbous bluegrass, cheatgrass, and field brome, are represented. Patches of perennial grassland with crested wheatgrass, bluebunch wheatgrass, Sandberg bluegrass, and bottlebrush squirreltail are interspersed, particularly in the northern part of the central section. The perennial grasslands lack a native shrub cover due to past wildfire. Patches of annual grasslands dominated by medusahead, cheatgrass, and field brome are interspersed with the Wyoming big sagebrush shrublands in the southernmost part of the central section. Rocky basalt outcrops and cliffs are present in the southern section, and the project area crosses the basalt cliffs of Camas Creek at the western edge of the Magic Reservoir. Ephemerally moist swales and drainages are interspersed and the project area crosses multiple mesic graminoid dominated wet meadows occurring in low swales.

A small section of the project area, approximately six-tenths of a mile, burned during the 2013 Fir Grove Fire. It appears that the Fir Grove Fire had very little impact on the vegetation community of this area. The ROW crosses a small finger of the fire perimeter that protrudes from the main body; however, the majority of this area still has sagebrush shrublands intact and only a few localized areas that show more severe fire intensity and charred shrub skeletons. Access roads cut through the main body of the fire where shrub skeletons are much more apparent, however gray/rubber rabbitbrush may have survived the fire or resprouted post-fire. Graminoid composition in this area is sparse and diverse, with the exception of a few small pockets of cheatgrass and bulbous bluegrass dominance. The most common graminoid species present include Sandberg’s bluegrass, bluebunch wheatgrass, bottlebrush squirreltail, and Great Basin wildrye. This area has a diverse forb composition, and a limited amount of weedy species.

The northern and southern extremes of this section have well defined service roads within the ROW. The service roads in both of these portions of the line are well traveled and have limited vegetation with the exception of some graminoid species. These portions also contain occasional, low density populations of noxious weeds. Diffuse knapweed is the most abundant noxious weed in this section of line; however, the majority of the noxious weeds are located to the northeast of highway ID-46. While little vegetation is present within the roads themselves, a variety of sagebrush communities are present adjacent to the roads. Sandberg's bluegrass and cheatgrass are the most abundant graminoids in the roads of the central section. In the large middle portion of the central section, the service roads are often overgrown with vegetation. The service roads here are very faint, if their existence was detected at all. The overgrown service roads go through communities dominated by mountain sagebrush, low sagebrush, and Wyoming big sagebrush. The most common forbs in the area are several buckwheat species, lupine, and several phlox species. Substrate in service roads varies from very little rock substrate to roads that go over bedrock and boulders.

Southern Section of ROW

The southern section of the project area is flat to gently rolling desert with occasional basalt outcrops, and occurs from between 3,320 and 4,150 feet in elevation. This section is in much closer proximity to agricultural lands as compared to the northern and central sections, and is more influenced by disturbances such as livestock grazing, canals, and roads within and adjacent to the project area. Basin big sagebrush and Wyoming big sagebrush shrublands with understories of invasive annual grasses (cheatgrass, medusahead, and field brome) are common in this section. Some areas had been burned and converted to medusahead- or cheatgrass-dominated annual grasslands. Patches of abundant tumble mustard are also present. Occasional sparsely vegetated basalt outcrops dominated by dwarf goldenbush and occasional antelope bitterbrush and forbs such as hotrock penstemon and skullcap are interspersed within the big sagebrush/annual grass communities.

Three weedy riparian areas occur within the southern section of the project area. A riparian area characterized by scattered Russian olive and willow trees with a scattered shrub layer of coyote willow and an understory with noxious and non-native forbs such as Canada thistle and Fuller's teasel was identified. The project area crosses a large irrigation canal with a riparian plant community dominated by Canada thistle, with some coyote willow and Woods' rose in the shrub layer and sparse Russian olive and black cottonwood trees in the overstory. A very narrow riparian area along a large irrigation canal dominated by Woods' rose and Russian olive with a (mostly weedy) forb and graminoid understory were also observed.

The majority of the southern section of line has service roads in good condition that occur within the ROW. These roads are present in all areas except for a few small areas in the northernmost portion of this section. Vegetation is limited to sparse invasive annuals, such as cheatgrass. Service roads in the northern portion go through Wyoming big sagebrush communities; however, most of the service roads that have become faint travel through grassland. Rocks in or adjacent to the roadway range in size from pebble-gravel to boulder-bedrock. Cheatgrass, bulbous bluegrass, and Sandberg's bluegrass were the most common species within the roads. Shrub presence in roads was mostly due to encroachment on the edges, not rooted in the roadway. The

most common forbs encountered in the southern section of the survey area were wavyleaf thistle, fiddleneck , and common sunflower.

Mourning milkvetch was found at multiple locations within the project area (URS 2011 and IPC 2014) (Table 9). Mourning milkvetch was found in slightly disturbed areas as well as areas with little to no disturbances. This species was most often found within alkali and low sagebrush/perennial bunchgrass (typically dominated by Sandberg bluegrass) communities but was also occasionally found in areas where mountain big sagebrush was the dominant overstory shrub. Groups of observed mourning milkvetch plants are considered distinct occurrences if separated by at least one mile.

Table 9.
Mourning Milkvetch Locations and Approximate Number of Plants Associated with Roads and Tensioning Sites

Location by Structure	Approximate Number of Plants	Project Facility	Road Category
Associated with Roads and Tensioning Sites			
173 – 198	159	Service road	A
204 – 217	346	Service road and tensioning site	B
217 – 225	31	Service road	A
236 – 243	38	Service road and tensioning site	C
260 – 261	1	Service road	C
279 – 281	27	Service road	A
293 – 314	62	Service road and tensioning site	A
314 – 325	1	Service road and tensioning site	A
325 – 340	29	Service road and tensioning site	A
381 – 387	242	Service road	A

A single occurrence of about 260 individuals was encountered in the northern section of the ROW. This occurrence was found in both low sagebrush and alkali sagebrush shrublands with a healthy perennial bunchgrass understory dominated by Sandberg bluegrass. Five occurrences were found in the central section of the ROW. The northernmost occurrence, which spanned approximately 1.3 miles, consisted of an estimated 40 plants. An area of potential habitat with no plants observed was found just south of this occurrence. The second occurrence in the central section, which spanned a length of about 2.7 miles of the ROW, consisted of an estimated 4,070 plants. The third occurrence in this section consisted of eight plants, and the fourth occurrence consisted of three plants. The last occurrence in the ROW, which ran along Highway 46, consisted of an estimated 1,400 plants over a span of approximately five miles. Within the central section this species was most often found within alkali and low sagebrush/perennial bunchgrass (typically dominated by Sandberg bluegrass) communities but was also occasionally found in areas where mountain big sagebrush was the dominant overstory shrub. No occurrences were found in the southern section of the ROW. These six occurrences occupy an area approximately 9 miles in length and contain an estimated 5,781 individual plants. All mourning milkvetch individuals observed were within or immediately adjacent to the existing ROW.

No other SSP species were observed within the project area. Giant helleborine, matted cowpie buckwheat, Malheur princesplume, and bug-leg goldenweed all have INHP documented occurrences within a mile of line 433, although none were observed during the terrestrial visual encounter surveys (URS 2011 and IPC 2014). No potential habitat was found for Snake River milkvetch, Greeley's wavewing, giant helleborine, matted cowpie buckwheat, or Malheur prince's plume. Potential habitat for bug-legged goldenweed was available, particularly within the wet meadows; however, no individuals of this species were observed.

6.2.2 Wildlife Habitat and Sensitive Wildlife Species

The wildlife habitat for sagebrush obligate species within the ROW was primarily assessed as good condition with moderate potential for sagebrush obligate species to occur, due to the abundance of sagebrush and additional shrubland habitat within the ROW. The primary sagebrush habitat within the ROW exists in the northern section. Perennial and annual grasslands ranging in condition from fair to poor were also present within the ROW. Substantial stands of tall sagebrush providing moderate to dense cover were present. These stands could potentially provide nesting and wintering habitat for greater sage-grouse. Perennial bunchgrass understories were present within several sagebrush communities in the northern and central sections of the ROW, along with annual grass understories present within sagebrush stands in the southern section of the ROW. The amount and location of grassland vegetation within and surrounding sagebrush habitat along the ROW could potentially provide forage, cover, and breeding habitat for several shrub-steppe wildlife species. Overall, the ROW could provide good breeding and nesting habitat, summer and winter forage, and significant cover for wildlife adapted to shrub-steppe habitats. The rocky outcrops and cliff faces within portions of the ROW could also provide good quality nesting and roosting habitat for wildlife such as ferruginous hawks, prairie falcons, peregrine falcons, golden eagles, and spotted bats. The perennial grasslands, particularly where non-native species are not abundant, provide fair to good foraging habitat for grassland adapted species. The poor condition annual grasslands that lacked shrub cover, likely due to past wildfire and other ground disturbance, were dominated by non-native grasses and non-native weedy forbs providing minimal food, cover, or breeding habitat for shrub-steppe wildlife species. These areas were considered poor habitat for wildlife.

Two SSW species were observed along the ROW during field surveys, Brewer’s sparrow and western toad.

6.2.2.1 Greater sage-grouse

The greater sage-grouse is North America’s largest grouse and they are a sagebrush obligate species as their name implies. This species will utilize sagebrush habitat in foothills, plains, and mountain slopes. The sagebrush composition is not limited to big sagebrush, as sage-grouse will utilize low (dwarf) sagebrush habitat as well as a mix of low and big sagebrush. Successful nesting habitat requirements include a sagebrush canopy cover of 15 - 25%, sagebrush heights of 30 - 80 cm (12 – 31.5 inches), and grass/forb cover of 18 cm (7 inches) (Connelly et al., 2000, p. 977). Summer brood-rearing habitat also includes riparian areas and wet meadows. Dietary behaviors are related to age, seasonality/availability, and other local variables. Insects are the main dietary component of chicks although this preference is mostly replaced by a vegetative

diet (leaves, flowers, etc) from shrubs and forbs as sage-grouse reach maturity. In fall and winter, sage-grouse diet shifts primarily to sagebrush (Wallestad 1975). Courtship displays and mating occur at communal display sites called leks, which are relatively open sites within sagebrush shrubland that are adjacent to nesting and brood-rearing habitat. Lek sites are formed by males in areas with potential nesting habitat and high female traffic (Wakkinen et al 1992-Connelly et al. 2000). Female reproductive success, especially in pre-laying females, has been linked to areas with relatively diverse and abundant forb communities (Barnett and Crawford 1994).

The BLM identified conservation areas; biologically significant units; three habitat categories; nesting and late brood rearing habitat; and winter habitat in the 2015 Final EIS (Figure 6). The project area occurs in the Idaho Desert Conservation Area (located between King Hill Substation and US-20) and the Idaho Mountains Valleys Conservation Area (located between US-20 and Wood River Substation). The project area occurs in three Biologically Significant Units (BSU); the Idaho Desert Conservation Area – Priority; Idaho Mountains Valleys Conservation Areas – Priority and Important. The proposed ROW crosses approximately 26.8 miles of PHMA, 10.4 miles of IHMA, and 6.4 miles of GHMA on BLM-managed, private, and State lands.

Occurrences Proximate to Project Area

There are 14 occupied leks within 2 miles of the project (Table 10; Figure 6) (INHDB; July 2015). During survey efforts in 2014, two sage-grouse were observed; however, both were observed outside of the ROW. The first observation was 0.45 miles to the west of the project area near Thorn Creek Reservoir. The other observation was approximately one mile from the ROW, north of US-20 and the terminal end of Rock Creek.

Table 10.
Occupied Greater Sage-grouse Leks Occurring within Two Miles of the Project Area

Lek ID	Lek Name	2015 Status	Mgmt Status	Last Count	Distance from ROW
1C059	Horn Spring	Active	Occupied	2015	1.17 miles
1C023	Dove RSVR	Inactive	Occupied	2015	1.83 miles
1C010	Combined w/ 1C013	Active	Occupied	2015	0.48 miles
1C010a	Old 1C013	Active	Occupied	2015	1.37 miles
1C011		Inactive	Occupied	2015	1.49 miles
1C028		Active	Occupied	2015	1.98 miles
1C002		Active	Occupied	2015	0.53 miles
1C029		Active	Occupied	2015	1.98 miles
1C031		Active	Occupied	2015	1.55 miles
1C006	Macon Lake	Active	Occupied	2015	1.86 miles
5B163	Rock Cr. Ranch	Inactive	Occupied	2015	1.34 miles
5B163	Little Rock Creek	Inactive	Occupied	2015	1.95 miles
5B167	Low Pass	Inactive	Occupied	2015	1.96 miles
5B164	Gilman Spring	Active	Occupied	2015	1.06 miles

Ravens and Raptors

During URS' July 2011 surveys, five raven nests were observed on top of the structures within the central and southern sections of the ROW. One of the raven nests within the central section was active with one juvenile present in the nest, and no adults were seen in the general area. The four other raven nests were all inactive. An unknown raptor nest was observed within the central section on top of a structure.

The proposed steel structures have rounded cross arms that are less likely to support raven and raptor nests than wooden cross arms. To determine if steel cross arms support nests, Idaho Power conducted an aerial survey of the following three transmission lines to document the presence of bird nests (February 5, 2013 memo to Natalie Cooper, BLM):

- Line 951 (Midpoint to Borah) was constructed in 1961 and consists of a mixture of materials and H-frame styles, including wood H-frames similar to the existing structures on Line 433 and steel H-frames similar to those proposed for the Line 433 rebuild. There are approximately 632 structures along this 78-mile long line (approximately 44.7 miles occur on BLM-managed lands). Line 722 (Borah to Hunt) was rebuilt in 2007 and consists of steel H-frame structures similar to those proposed for the Line 433 rebuild. There are approximately 445 structures along this 70 mile long line (approximately 35 miles occur on BLM-managed lands).
- Line 723 (Danskin to Hubbard) was rebuilt in 2008 and consists of steel H-frame structures similar to those proposed for the Line 433 rebuild for the majority of its length; steel monopole structures are used in urban areas near the community of Kuna and the Hubbard Substation. There are approximately 272 steel H-frame structures along this 42 mile long line. The majority of this line is not adjacent to other transmission lines except for urban areas or in the vicinity of the substation.

No nests or signs of nests were found on lines 722 and 723. The steel H-frame structures used on these lines are similar to those proposed for the Line 433 rebuild.

A total of six nests were observed on Line 951. These were located on the following structures and types:

- Structure 28 – wood H-frame; nest between cross arms
- Structure 37 – wood H-frame; nest between cross arms
- Structure 95 – steel H-frame Structure 193 – wood H-frame; nest between cross arms
- Structure 243 – wood H-frame; nest between cross arms
- Structure 244 – wood H-frame; nest between cross arms

None of the nests were occupied. Less than 1 percent of the structures on Line 951 supported bird nests. The absence of bird nests on steel H-frame structures indicates that the proposed rebuild for Line 433 may not result in an increase of nests and may reduce the number of nests along the line.

7 STABILIZATION AND REHABILITATION

The primary goal of stabilization and reclamation activities is to restore temporarily disturbed areas to pre-construction conditions to the extent practical. The short term objectives are to stabilize disturbed areas to minimize potential erosion and sedimentation, establish vegetation cover, and prevent or minimize the introduction and spread of noxious- and invasive-weed species. The long-term objective is to establish permanent vegetation cover that is similar to pre-disturbance conditions, self-sustaining, and, where applicable, resistant to the introduction or

spread of noxious- and invasive-weed species. Stabilization and rehabilitation measures should not be confused with mitigation measures (which are discussed in Section 8).

To minimize possible impacts to natural resources, reduce erosion and sedimentation, and minimize noxious weeds, IPC will conduct stabilization and rehabilitation activities in areas affected by ground-disturbing construction activities.

Stabilization and reclamation activities include the following:

- Implementation of construction and post-construction best management practices to minimize erosion and sedimentation and facilitate plant establishment.
- Conduct post-construction weed monitoring and control to pre-construction conditions following the completion of construction.
- Re-establish topography to pre-construction conditions to the extent practicable.
- Reseed temporarily disturbed areas.

Disturbed areas will be seeded as appropriate and as soon as possible during the optimal seeding period following ground disturbance (see Table 11 for seed mix and application rates). The best time to seed is in the fall (September−November). If seeding cannot be done then, spring seeding should take place as conditions dictate. IPC will work with the BLM to develop mutually agreeable specifications for site rehabilitation. General methods are presented below; these are subject to revision based on consultation with the BLM.

Table 11.
Seed Mix and Application Rate for Stabilization and Rehabilitation Activities.

Low Elevation Seed Mix - Seed Mix and Application Rate for Rehabilitation Activities - King Substation to Structure 200.	
Species and Seed Variety	**Seed Rate Pounds/Acre PLS**
'Discovery' Snake River Wheatgrass	4.00
'Vavilov II' Siberian Wheatgrass	2.00
Squirreltail	4.00
'Sherman' Big Bluegrass	0.50
Western Yarrow	0.10
High Elevation Seed Mix - Seed Mix and Application Rate for Rehabilitation Activities – Structure 201 to Wood River Substation.	
Species and Seed Variety	**Seed Rate Pounds/Acre PLS**
'Anatone' Bluebunch Wheatgrass	4.00
'Trailhead' Basin Wildrye	1.00
'Sherman' Big Bluegrass	0.50
'Eski' Sainfoin	2.00
'Appar' Lewis Flax	0.20

Sagebrush will be included in the seed mix for rehabilitation of pulling and tensioning sites and work pads, but will not be used on roads. Through time, sagebrush could interfere with the safe operation of vehicles and would need to be cleared.

The surface of the ground must be prepared prior to seeding; a process called seedbed preparation. Before seedbed preparation, an inspection of the site will determine the most

appropriate method to use. Where practical and agreed to with the BLM, IPC will follow these guidelines for preparing the seedbed:

1. The surface will be cleared of foreign materials, such as garbage, paper, and other materials, but all rocks and minor woody debris would be left in place. IPC will prepare the seedbed immediately prior to seeding.
2. Under the right soil-moisture conditions, a standard disk or spring bar harrow will be used to roughen the topsoil layer to create the desired surface texture before the seed is applied. Dirt clods and chiseled voids resulting from the roughening process increase the surface area for water collection and provide micro-sites for seed establishment. The soil should be disked or harrowed to no more than 2 inches deep at a time when soil moisture allows the surface to remain rough, with clods approximately 2 to 4 inches in diameter.
3. Disking or harrowing should be performed parallel to surface contours. In this way, downslope alignment of furrows can be avoided. In areas that already have the desired soil characteristics; the seedbed does not need to be prepared.

After the seedbed has been prepared, seed would be broadcast on the disturbed area, after which the seed will be lightly harrowed into the ground. Stabilizing material (e.g., weed free straw) may be added if necessary. Seeding efforts will not be performed when wind velocities will prohibit the seed mix from being applied evenly. Mulch and soil amendments would be used if requested by the BLM.

8 MITIGATION MEASURES

The generally accepted definition of mitigation includes a range of activities or measures that avoid, minimize, rectify, and compensate for residual impacts. The focus of this mitigation plan is on compensatory mitigation, defined as "compensation for residual impacts that were not avoided, minimized, or rectified by providing substitute resources or habitats, often at a different location than the project area" (Sage-grouse Mitigation Subcommittee; December 6, 2010. *Framework for Mitigation of Impacts from Infrastructure Projects on Sage-Grouse and Their Habitats*.) (Mitigation Framework).

The goals of Idaho Power's mitigation is to:

- Address residual direct impacts to maintain and enhance greater sage-grouse habitat.
- Be consistent with Appendix F in the ARMP.
- Be consistent with the Idaho Sage-grouse State Advisory Committee Sage-grouse mitigation subcommittee mitigation framework.
- Be consistent with the BLM's Draft MS-1794-Regional Mitigation Manual Section.

Draft MS-1794 states that"… the BLM may accept an offer of monies from an applicant to fund specific mitigation projects, either on or off BLM-managed lands." The draft manual provides specific criteria that would be followed when developing the mitigation or financial contribution agreement. Idaho Power would provide mitigation funds to the BLM to implement one of the following types of mitigation projects:

- Implement components of the BLM's burned area restoration plan for recent fires in the project vicinity; or
- Provide additional restoration for recently burned areas; or
- Identify roads in the project vicinity that are no longer necessary and develop and implement a plan to restore the roads; or
- Develop and maintain fire breaks that protect PHMA, IHMA, and GHMA (e.g., implement a portion of the Paradigm Project[1]).

Potential mitigation sites occur adjacent to the existing ROW (i.e., area burned by the Fir Fire in 2013).

As part of the development of the enhancement plan for the Gateway West transmission line project, Idaho Power worked with BLM biologist Trisha Roller to identify the costs and likelihood of success for small scale intensive restoration efforts. The BLM cost estimate for sagebrush restoration within the Morley Nelson Snake River Birds of Prey National Conservation Area is $1,500 per acre. The estimated success rate is 50 percent. To mitigate impacts to 14 acres of greater sage-grouse habitat and to provide a net conservation gain, Idaho Power would fund restoration of 20 acres. Given that there is a chance that 50 percent of the area (10 acres) would need to be reseeded, we would provide an additional $15,000 as "contingency" funds. Idaho Power would provide a total of $45,000 to the BLM to implement a habitat restoration project or other project that would result in a benefit to greater sage-grouse. Idaho Power would also provide $11,450 for monitoring. This amount is based on the BLM's monitoring rate schedule and assumes a Category 4 rate ($1,145/year) and monitoring over 10 years. In total, Idaho Power would provide **$56,450** for mitigation. Acceptance of the funds would complete Idaho Power's mitigation obligation for this project.

9 OPERATION AND MAINTENANCE

Idaho Power performs O&M activities to keep the transmission line operational and in good repair. These activities are either planned (such as those for routine patrols, inspections, and scheduled maintenance) or unplanned (such as those for emergency maintenance in cases where public safety and property are threatened). The activities presented below are considered routine O&M activities. The methods described below, represent the typical way in which these activities are carried out. Maintenance on any particular structure may vary depending upon a number of factors and these activities may be carried out by Idaho Power as necessary; however, all maintenance on the King to Wood River transmission line remains subject to the definitions, descriptions, and environmental protection measures identified in Master Agreement (MA) BLM-MA-ID-001 signed April 2012 and subsequent revisions and the specific terms, conditions and stipulations of the ROW grant and reporting requirements. A copy of the MA is provided in Appendix 4.

[1] https://www.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=15052&dctmId=0b0003e8801b2c6b. Accessed 4 February 2014.

Patrols and Inspections

Routine air patrols to inspect for structural and conductor defects, conductor clearance problems, and hazardous trees. These are typically conducted from a helicopter and personnel include a pilot and line patrolmen. Inspections may be conducted in the spring and fall. The helicopter typically flies over the line and is in proximity of a given structure for less than a minute; more time may be spent circling a structure if a problem is noted and photographs are necessary.

Routine ground patrols to inspect structural and conductor components. Patrols may rely on direct line-of-sight and/or binoculars. Patrols are typically conducted in the spring and fall. Follow-up maintenance would be scheduled depending on the severity of the problem, either as soon as possible or as part of routine scheduled maintenance. A vast majority of such inspections require either an utility-terrain vehicle (UTV) or a pickup truck traveling on established roads and travelways. Personnel rarely leave the road unless there is no other option to access and inspect a structure. Follow-up maintenance would be scheduled depending on the severity of the problem, either as soon as possible or as part of routine scheduled maintenance. Maintenance work is also scheduled depending on whether the work can be conducted on an energized line and when the line can be taken out of service.

Climbing structures to inspect hardware or make repairs. Personnel access these structures by UTV or pickup truck traveling on established access and service roads, two-tracks, or UTV trails. If the structure cannot be accessed via a road, two-track or UTV trail, IPC personnel would walk to the structure. Crews use bucket trucks to inspect hardware and / or make repairs. The bucket truck may be located on or off a road and parallel or perpendicular to the structure. Trucks are stabilized using outriggers so little to no grading of the existing work pad is necessary to create a safe work area. The need for grading depends on the condition of the existing pad and topography. The use of a bucket truck requires a passable road or travelway to the structure.

Structure and Road Maintenance

Structure or conductor maintenance from a maintenance vehicle. The maintenance vehicle would be located on a road, trail or maintenance route or may be parked perpendicular to the ROW. Maintenance vehicles are stabilized using outriggers so little to no grading of the existing structure pad is necessary to create a safe work area. The potential need for grading would depend on the condition of the existing structure pad and existing topography. Structure maintenance may include replacement of crossarms, insulators, or other hardware and crews typically spend less than a day at the structure. Conductor maintenance may be conducted while the line is energized or de-energized (depends on the voltage, required maintenance, and crew safety), and may be done while the line is on the structure or the line may be lowered to the ground. Conductor maintenance may include the use of pulling and tensioning equipment; this would likely occur if the conductor were replaced.

Routine inspection and maintenance of authorized service and access roads following line rebuild. Roads are inspected and repairs are made as necessary throughout the life of the transmission line. Typically, a three-man crew uses hand tools to cut small brush and trees (greater than 12-inches tall); remove dead fall and debris; and repair and replace signs on access and service roads. Crews also prepare an inventory of road damage that would require ground

disturbance (e.g., repair of a failed bank); repair work scheduled accordingly (typically the following year). Inspections and maintenance are typically conducted from spring through summer, when roads are clear of snow. When conducting road maintenance activities, where length, width, and alignment of road remains the same as the existing road prism, maintenance activities could include blading the road to maintain the surface condition and drainage, removing minor physical barriers (i.e. rocks and debris), replacing culverts, rock crossings, or other erosion control structures, and rehabilitating after major disturbances (i.e., repairing slumping or erosion damage). Equipment to maintain roads would vary depending on the type of work necessary. Typical equipment includes a bulldozer to move rocks or for grading. Trees and brush are cut off at grade to minimize damage to vehicles; chain saws, weed whips, and/or Slashbuster may be used. Slash, deadfall, and boulders would be placed at the edge of the road or down slope of the road bed, depending on site topography, to serve as a filtering windrow to minimize erosion and sedimentation. Smaller vegetation (e.g., grasses) would be left in the road bed unless it is too tall and hinders access. Work may take less than a day or several days depending on the severity of the problem. Crews would install waterbars as necessary. Other best management practices to address potential erosion and sedimentation would be addressed on a case-by-case basis, but could include the use of filtering wind rows made from previously impacted vegetation, straw mulch, tackifier, and reseeding.

Installation of bird protection devices, bird perch discouragers, and relocation or removal of bird nests. Under the authority of the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act or Idaho Code, the appropriate permits shall be acquired from U.S. Fish and Wildlife and/or Idaho Department of Fish and Game, prior to relocation or removal of nests. As a courtesy, IPC would provide the IPC BLM MA Realty Specialist with a copy of the required permit from the FWS, prior to commencing the activity. The equipment and crews used to install bird protection devices are similar to those used for structure maintenance work. Installation of bird protection devices would typically take less than half a day at a structure or on a span.

In-kind structure replacement (e.g. a monopole with a monopole, an H-frame with an H- frame or a lattice structure with a lattice structure). The material-type (e.g. wood or steel) does not matter, but if height and width do not remain the same then the replacement is considered a substantial deviation. Maintenance vehicles may be located on or off a road. Trucks are stabilized using outriggers, so little to no grading of an existing structure pad is necessary to create a safe work area. As it is not usually possible for the replacement pole to go into the same hole as the old pole, especially when the replacement has to be done with the line energized, pole replacements are placed adjacent to the old hole but still within the existing structure pad (Table 2). Equipment may include a truck-mounted auger, bulldozer, crane, bucket truck, and crew haul vehicles. Old poles are typically cut off close to grade and old structures are removed from the site. If rock is encountered, a rock drill may be used, but frequently, controlled blasting is used to create a hole. Work is typically scheduled when the line is de-energized as this is the safest method for the crews.

Vegetation Management

IPC manages vegetation within its ROWs and on access and service roads to minimize interference with the flow of electricity, to address safety issues, and to facilitate O&M activities.

IPC's vegetation management complies with the National Electric Safety Code (NESC) and North American Electric Reliability Corporation's (NERC) requirements[2]; these dictate minimum clearance standards. IPC will conduct vegetation management within the full ROW and access and service roads widths as necessary. General vegetation management in the ROW is scheduled on a periodic basis; periodicity is dependent on the type of vegetation present and how quickly it may grow between management cycles. In most cases, vegetation management within the ROW will not be necessary for operation of the King to Wood River transmission line because the existing vegetation is not expected to exceed clearance requirements. Vegetation management within roads and work areas associated with structures will be conducted on a periodic basis as necessary. This could include removing taller shrubs that interfere with safe travel on roads or the safe operation of equipment while working at or on a structure. Crews will keep vegetation management to the minimum necessary to conduct the job safely. Vegetation management may be done with hand tools (e.g., chain saws, weed whips) or mechanical means (e.g., Slash Buster). In rare cases, a bulldozer may be used; this would likely occur when grading of a work pad is necessary.

Vegetation clearing cycles vary from 3 to 6 years. Personnel would access the area by UTV or pickup truck traveling on established access and service roads, two-tracks, UTV trails, or on foot. The work would typically be conducted on foot with chainsaws and weed whips. However, if a mechanical device (e.g. slashbuster) is needed to conduct the clearing, personnel would access the area by vehicle with the mechanical device attached to the vehicle. While conducting vegetation clearing activities, personnel typically spend less than half a day in an area. The frequency and amount of vegetation clearing depends on the species present, growth rate, and clearance requirements. For example, in areas with sagebrush, vegetation management is typically conducted adjacent to structures or where it interferes with safe access to the facility or safe operation of equipment. Sagebrush is not typically removed from the majority of the ROW because it does not have the potential to interfere with operation of the line. In forested areas, trees within the full extent of the ROW may be periodically removed if they have the potential to exceed clearance requirements before the next management cycle. In most cases, vegetation management within the ROW would not be necessary for operation of the King to Wood River transmission line because the existing vegetation is not expected to exceed clearance requirements.

<u>Removal of individual trees or snags (hazard trees), inside the ROW boundary, that pose a risk of falling into the power line, conductors or structures and causing outages or fires</u>. The work would typically be conducted on foot with chainsaws. Personnel would access the area by UTV or pickup truck traveling on established access and service roads, two-tracks, UTV trails, or on foot. However, if a mechanical device is needed to conduct the clearing, personnel would access the area with the mechanical device attached to a vehicle. While conducting vegetation management activities, personnel typically spend less than half a day in an area.

[2] NERC's mission is to ensure the reliability of the North American bulk power system. NERC is the electric reliability organization certified by the Federal Energy Regulatory Commission to establish and enforce reliability standards for the bulk-power system. NERC FAC-003-1 identifies vegetation management requirements.

Vegetation removal on authorized access and service roads to allow the necessary clearance for access and provide for worker safety. Smaller vegetation (e.g., grasses) that does not hinder vehicle access is left in the road bed. Hand crews access the service roads by pickup or UTV and use chainsaws and hand tools to clear the vegetation. Removal is typically associated with a maintenance activity, but may also be conducted periodically to keep the roads open for inspections.

In uplands, vegetation six inches or greater in diameter that has been cut during vegetation clearing activities, would not be dropped and left in place, but would be cut into smaller pieces and dispersed within the ROW boundary to avoid concentrated piles or rows of accumulated fuel or would be hauled away. Dispersement within the ROW boundary can include placement on the edge or down slope of the road bed to be a filtering windrow to minimize erosion and sedimentation. In riparian areas, cut vegetation should be left on the ground, as long as the location does not interfere with the intended use of the ROW.

Burning vegetation is not authorized by the Master Agreement and is not typically conducted by IPC. If IPC were to determine that the litter volume could warrant burning on site, IPC would contact the appropriate Field Office, in advance of these clearing operations. BLM would work with IPC to select burn sites and provide procedures for piling. Any burning on BLM land would be conducted by and/or authorized by BLM fire personnel at IPC's cost.

Emergency Actions

Emergency situations are those conditions that may result in imminent or direct threats to public safety or threaten or impair Idaho Power's ability to provide power to its customers. The following examples include actual and potential emergency situations:

- Failure of conductor splices;
- Lightning strike or wildfire resulting in burned wood pole structures (existing line) or the smoke causing flashover between the conductors;
- Damage to structures from high winds, ice, or other weather-related conditions;
- Line or system outages or fire hazards caused by trees falling into conductors;
- Breaking or imminent failure of cross-arms or insulators, which could or does cause conductor failures; and
- Vandalism to structures or conductors from shooting or other destructive activities.

Activities to address emergency situations are the same as those implemented for O&M activities; however, adherence to all environmental protection measures (EPM) may not be feasible.

10 TERMINATION AND RESTORATION

At the end of the useful life of the transmission lines, if the facility is no longer required, the lines will be removed from service. Upon decommissioning, conductors, insulators and hardware will be dismantled and removed from the ROW. Structures will be removed and foundations (if present) abandoned in-place or cut off below ground level and buried. IPC will

coordinate with the BLM to determine the most appropriate method. Following abandonment and removal of the transmission line structures and equipment, any areas disturbed during decommissioning will be restored and rehabilitated as described in Section 7.

11 ENVIRONMENTAL PROTECTION MEASURES

As part of standard operating procedures, standard environmental protection measures (EPMs) will be implemented by IPC, and its contractors, throughout the term of the ROW in order to minimize potential adverse impacts to the environment. Most of the impacts are short-term and generally occur during the initial rebuild period. Project design and implementation of site-specific EPMs will minimize the effect of the project where the potential for adverse impacts may occur. The EPMs provided below are intended to protect resources within and adjacent to the ROW.

GENERAL MEASURES

- GM-1. Existing improvements (fences, gates, etc.) would be repaired or replaced to their condition prior to disturbance if they are damaged by IPC, as agreed to by the parties involved.
- GM-2. The BLM may restrict general public access to closed federal roads that IPC may use and maintain (IPC would maintain service roads constructed for IPC use only). In cases of restricted access, IPC would physically close the road with a gate; as directed by the BLM. Gates would be locked with locks supplied by IPC and the BLM.
- GM-3. Appropriate traffic control measures, where necessary, would be used to ensure public safety during construction and O&M activities. Prior notice would be given for any extended delays or road blockage.
- GM-4. For ground disturbing activities that are one acre or more, IPC would prepare and implement a construction storm water pollution prevention plan in compliance with NPDES requirements.

BIOLOGICAL RESOURCES

- B-1. Sensitive plant populations that occur within or near the ROW and work areas would be flagged , to ensure that they are avoided. Sensitive plant locations were mapped using global positioning system (GPS) equipment during surveys; GPS would be used to relocate populations to facilitate flagging. If previously undocumented species are discovered during the work, IPC would establish a spatial buffer zone, would contact the BLM within 24 hours, and would continue with the activity outside of the established buffer unless otherwise directed. The buffer would encompass the population and adjacent suitable habitat within the work area. Unless IPC is informed otherwise, work outside of the buffer area would continue. If IPC needs to work within the buffer area, the BLM and IPC would work together to develop a solution that is acceptable to both parties and would allow for IPC to complete the work in a timely manner or within the scheduled outage window, if applicable. After activities are completed, or would no longer poses a threat to the plant population, the marking (stakes), if used, would be promptly removed to protect the site's significance and location from unwanted attention. As needed, marking would be reinstated during the land rehabilitation period.

- B-2. If sensitive wildlife species are discovered during IPC activities, and the animals are not directly within ground disturbance areas, they would be protected by marking the edges of the ROW or work areas in the general vicinity to ensure that workers do not leave those areas. If the animals are within work areas that have, or would have, ground disturbance, and the animals are not expected to temporarily move out of the area, IPC would stop work in the immediate vicinity of the occurrence. Immediate vicinity refers to the work area and one span length in either direction. IPC would contact the Idaho Department of Fish and Game (IDFG) and BLM to determine the appropriate buffer. The IDFG, BLM, and IPC would work together to develop a solution that is acceptable to both parties and would allow for IPC to complete the work in a timely manner or within the scheduled outage window, if applicable. After activities are completed, or would no longer pose a threat to the species, any marking (stakes; flagging) would promptly be removed to protect the site's significance and location from unwanted attention. As needed, marking would be reinstated during the land rehabilitation period.
- B-3. In the event any sensitive plants cannot be avoided, the topsoil surrounding the plants would be salvaged, stored separately from subsoil, and re-spread during the restoration process.
- B-4. The Project has been designed and would be constructed in compliance with Avian Power Line Interaction Committee (APLIC)[3] standards in order to reduce impacts to avian species.
- B-5. Nesting, roosting, and perching birds—especially osprey—can cause power outages if their feces or nesting materials interfere with conductors, insulators, or air gaps. IPC, in consultation with the USFWS, manages nesting on transmission line structures to reduce conflicts. Such management may include relocating nests, modifying structures, and providing nesting platforms. IPC would continue to consult with the USFWS and/or Idaho Department of Fish and Game when a problem nest is located.
- If a problem nest is suspected to be an eagle nest, IPC would coordinate with the USFWS prior to taking any action.
- If raptors are building a nest or a nest is unoccupied, the nest is considered inactive. IPC may dismantle the nest and install a nesting platform or other devices to prevent unwanted interactions between the birds and the electrical structure.
- If a nest is occupied and contains eggs or chicks, it is considered active, and **disturbance is only permitted** when the threat of fire hazard and power outages is present and imminent at the current nest location.
- B-6. Maintenance and rebuild activities should be conducted in a manner so as not to result in a take of migratory birds as defined by the Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. § 703 et seq. (2012) as amended.
- Crews conducting the rebuild would be trained to identify and protect nests during construction activities. Training would include what to look for: 1) whitewash (concentrations of white-colored droppings, 2) types of nests that may be encountered, 3)

[3] Avian Power Line Interaction Committee (APLIC). 2006. Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006. Edison Electric Institute, APLIC, and the California Energy Commission. Washington, D.C. and Sacramento, CA.

habitats where nests are most likely to occur, and 4) typical nesting periods for bird species that may be encountered. Training would also outline procedures to follow if a nest is found. Crews would survey areas scheduled for immediate and near-term construction activities.

- Maintenance activities occurring during nesting season, February 1 through July 31, should be limited to areas of existing surface disturbance (i.e., existing roads and structure pads). If maintenance activities must occur outside of areas of existing surface disturbance and have the potential to result in a take of migratory birds (e.g., surface disturbing activities that would directly affect vegetation in which birds may nest might be removed or driven over) then IPC's crews would inventory those areas for migratory birds prior to conducting the maintenance. If no nests are found, IPC may implement the planned maintenance. If nests are found, IPC may delay maintenance until after the nesting season or if that is not possible, IPC would consult with the USFWS and BLM.
- During vegetation maintenance activities, line-clearing crews will inspect shrubs, trees, and hazard trees to be trimmed or removed for active bird nests prior to cutting. If a cavity is found, a flash photo will be taken with a view inside the cavity to determine if the cavity is occupied. If an active nest is found, the location will be noted and provided to the IPC arborist in charge. If the vegetation is an imminent threat to public health and safety, the arborist will contact IPC's avian protection coordinator, who will contact the USFWS for appropriate permits allowing the nest to be moved or destroyed. If there is not an imminent threat, and the vegetation must be trimmed prior to the next vegetation management cycle, the arborist will schedule it to be treated after the nesting season. If ROW clearing is to be expanded into previously untreated vegetation, a nesting survey would be coordinated by IPC's Environmental Affairs prior to clearing. Based on the results of the survey, a treatment plan would be developed that would protect active nests.
- B-7. If occupied raptor nests are observed, the extent of likely construction disturbance would be assessed. If necessary, the following spatial and temporal buffers would be implemented:

Species	Nesting Period Range	Average Nesting Period	Spatial Buffer (miles)
Golden eagle	8 Feb–10 Jul	2 Mar–16 Jun	0.5-1.0
Bald eagle	1 Feb–15 Aug	2 Mar–15 Jul	0.5-1.0
Ferruginous hawk	22 Mar–16 Jul	13 Apr–28 Jun	1.0
Great-horned owl	15 Jan–7 Jun	20 Feb–11 May	0.25
Burrowing Owl	10 Apr–5 Aug	30 Apr–12 Jul	0.25
Swainson's hawk	20 Apr–14 Aug	8 May–21 Jul	0.25
Prairie falcon	1 Apr–16 Jul	14 Apr–24 Jul	0.50
Peregrine falcon	15 Mar–14 Jul	15 Apr–28 Jul	1.0
Northern goshawk	15 Apr–17 Jul	1 May–7 Jul	0.50
Osprey	1 Apr–15 Aug	15 Apr–30 Jul	0.25
Red-tailed hawk	18 Mar–20 Jul	11 Apr–25 Jun	0.33

- B-8. Required Design Features to address sage-grouse include:
    - No repeated or sustained behavioral disturbance (e.g., visual, noise over 10 dbA at lek, etc.) to lekking birds from 6:00 pm to 9:00 am within 2 miles (3.2 km) of leks during the lekking season (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations).
    - Areas with ground disturbance would be reseeded.

- Place infrastructure in already disturbed locations where the habitat has not been fully restored.
- Utilize existing roads, or realignments of existing routes to the extent possible.
- Design roads to an appropriate standard no higher than necessary to accommodate their intended purpose.
- Use free standing structures where possible, to limit the use of guy wires. Where guy wires are necessary and appropriate bird collision diverters would be used, if doing so would not cause a human safety risk.

CULTURAL RESOURCES

- C-1. Any unanticipated discovery of cultural and/or paleontological resource (fossil[s] or historic or prehistoric site or object) on BLM lands shall be immediately reported to the BLM. If new, probable historic, cultural, or paleontological resources are discovered during construction, potentially destructive work within 300 feet of the find would be halted. Pursuant to 43 CFR 10.4(g), the holder of the authorization must notify the BLM, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), activities in the vicinity of the discovery must be stopped until notified by the BLM to proceed. IPC would immediately implement the following measures:
- Flagging would be erected to prohibit potentially destructive activities.
- IPC's archaeologist would work with the BLM and through a coordinated effort to make a determination if the discovery represents a potential new site or an undocumented feature of a documented site.
- O&M activities would not resume in the identified area until cleared by the BLM.
- C-2. Before any activity involving ground disturbance begins adjacent to a known cultural site, IPC would generically mark the sites as an avoidance area. After the project is complete or no longer poses a threat to the cultural resource, the marking would be removed to protect the site's significance and location from unwanted attention.
- C-3. If human remains are discovered during O&M activities, IPC would stop all work in the immediate area to protect the integrity of the find and notify law enforcement and the BLM as soon as possible. In addition, the location of the find would be flagged or fenced off to protect it from further impacts. The BLM would determine what actions are necessary prior to resuming work.

NOXIOUS WEEDS

- N-1. Before beginning rebuild activities or O&M activities on BLM-managed lands, IPC or their subcontractors would clean all equipment that would operate off-road or disturb the ground. Tracks, skid plates, and other parts that can trap soil and debris would be removed for cleaning when feasible, and the entire vehicle and equipment would be cleaned at an off-site location. The purpose of this is to limit the introduction and / or spread of noxious weeds. If vehicles or equipment leave the site and travel off-road to another location before returning, they would be rewashed.
- N-2. All herbicide applications would comply with label restrictions, federal, state and/or county regulation, IPC's specifications and landowner agreements. No spraying would

occur on BLM-managed lands prior to notification to the BLM and receipt of a Pesticide Use Permit (PUP). The PUP would include the dates and locations of application, target species, herbicide, adjuvant, and application rates and methods (e.g., spot spray vs. boom spray). No herbicide would be applied to any private property without written approval of the landowner.

- N-3. IPC may treat large populations of noxious weeds on BLM-managed lands that occur in areas of proposed ground disturbing activities prior to the start of rebuild activities provided IPC receives approval and a PUP in a timely manner (i.e., rebuild activities would not be delayed to wait for approval and a PUP) and it is the right time of year to treat the species.
- N-4. Herbicides may be applied using a broadcast applicator mounted on a truck or all-terrain vehicle (ATV), backpack sprayers, or with hand sprayers as conditions dictate. Herbicide applications would be conducted only by licensed operators or under the supervision of a licensed operator. Vehicle-mounted sprayers (e.g., handgun, boom, and injector) may be used in open areas readily accessible by vehicle. Where allowed, a broadcast applicator would likely be used. In areas where noxious weeds are more isolated and interspersed with desirable vegetation, noxious weeds would be targeted by hand application methods (e.g., backpack spraying), thereby avoiding other plants. Preconstruction herbicide applications would not occur within 500 feet of known special status species. Calibration checks of equipment would be conducted at the beginning and periodically during spraying to ensure proper application rates.
- N-5. Project-related staging areas would be kept weed-free through regular site inspections and herbicide applications, subject to the consent of the landowner.
- N-6. If straw or hay are specified in the Construction Storm Water Pollution Prevention Plan (SWPPP), they shall be certified weed free. If soil needs to be brought in for backfill or other purposes, it shall be from a certified weed free source.

FIRE PREVENTION

- F-1. When performing activities during the “closed” fire season, IPC personnel and their contractors would be required to have the following equipment in their possession and be trained to use them, to aid in extinguishing a fire ignition before it gets out of control (taking action that a prudent person would take while still accounting for their own personal safety): a variety of fire suppression hand tools such as shovels, rakes, Pulaski’s etc., a 16-20 lb fire extinguisher, and 20-50 gallons of water with a way to effectively spray the water (i.e. backpack pumps, water sprayer, etc.).
- F-2. Upon arriving at a work area, IPC would conduct inspections of the undercarriage of vehicles after driving over roads with high vegetation to make sure grass and brush have not accumulated near the vehicle’s exhaust system.
- F-3. Each internal combustion engine shall be equipped with a spark arrester that meets the federal land managing agency’s standards.
- F-4. During BLM's Stage II Fire Restrictions, IPC would obtain an appropriate waiver and take appropriate precautions when conducting activities that involve an internal combustion engine, generate a flame, involve driving over or parking on dry grass, involve the possibility of dropping a line to the ground, or involve explosives by using a Fire Prevention Watch Person that would remain in the area for one hour following the cessation of that activity. Also, IPC personnel would not smoke unless within an

enclosed vehicle, building or designated recreation site, or while stopped in an area at least three feet in diameter that is barren or cleared of all flammable materials. BLM would inform IPC staff listed on the IPC Notification list (Appendix 1), when BLM's Stage II Fire Restrictions are implemented.

- F-5. IPC would notify the jurisdictional fire dispatch center immediately (see Appendix 1 for contact information) upon confirmation of a wildland fire, would move to a safe location and wait for fire suppression resources to arrive, and would check-in with the BLM incident commander if one is on the scene.
- F-6. If the BLM determines that it must use fire-suppression techniques that could affect operation of the lines, it would notify IPC as soon as possible.

AQUATIC RESOURCES

- A-1. Woody vegetation management within 50 feet of streams (definable streambeds or stream banks, regardless of whether there is flowing water) would be conducted by hand crews. Herbaceous plants and low-growing shrubs would be left in place if they do not interfere with the safe O&M of transmission lines and equipment. IPC would use existing stream crossings and would not create new crossings without prior BLM approval and other necessary regulatory approvals (e.g., Section 404 of the Clean Water Act). Off road vehicle use in live water is limited to existing crossings, to minimize the potential for impacts from crushing or introduction of sediments into waterways.
- A-2. Tank mixing of herbicides or fueling of motorized equipment would not occur in riparian areas.
- A-3. Surfactant R-900 would not be used in or adjacent to (within 50-feet) riparian habitats.

SITE REHABILITATION

- S-1. Final cleanup would be conducted at the end of each construction phase and would ensure that all construction areas are free of any construction debris including, but not limited to: assembly scrap metals, construction wood debris, and worker-generated litter. Permanent erosion control devices would be left in place.
- S-2. Temporarily disturbed areas would be re-contoured to blend with the surrounding landscape. Re-contouring would emphasize restoration of the existing drainage patterns and landform to preconstruction conditions, to the extent practicable. (Structure work pads would not be recontoured.)

12 POD HISTORY

This section summarizes amendments made to the POD after the plan's acceptance. The amendment history includes the date on which changes were made, a brief description of those changes, and the signatures of authorized representatives of IPC and BLM accepting the changes.

13 LITERATURE CITED

Avian Powerline Interaction Committee (APLIC) 2006. Suggested practices for avian protection on power lines: the state of the art in 2006. Edison Electric Institute, APLIC, and the California Energy Commission. Washington, D.C. and Sacramento, California.

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URS, Corp. 2011. Ketchum to King Transmission Line (Right-of-Way Grant IDI-012919) Wildlife, Plant, and Noxious Weed Terrestrial Visual Encounter Survey Report.

14 POD ACCEPTANCE

The following authorized representatives of IPC and the BLM Shoshone Field Office hereby accept this POD.

IPC:

Idaho Power Company

By: _____

Adam Richins

GM of Customer Operations, Engineering, and Construction

Date: _____

BLM:

Bureau of Land Management

Shoshone Field Office

By: _____

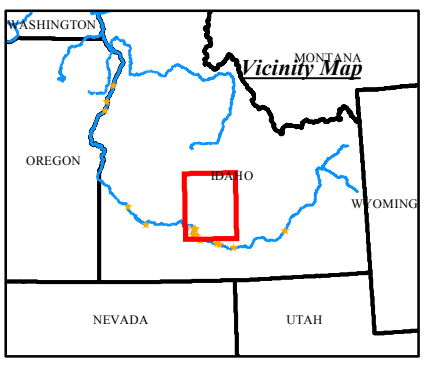
Codie Martin

Field Manager

Date: _____

Theme: \\fresno\Enviro_GIS\??.mxd

Wood River
Hailey
Moonstone
Silver
King
US-20
US-26
US-30
I-84
ID-75
ID-46
ID-24
US-93
ID-25
ID-79



Features Legend

- Substation
- Line 433
- Major Highways
- BLM Ownership

IDAHO POWER
An IDACORP Company

IDAHO POWER COMPANY, BOISE, ID 2013

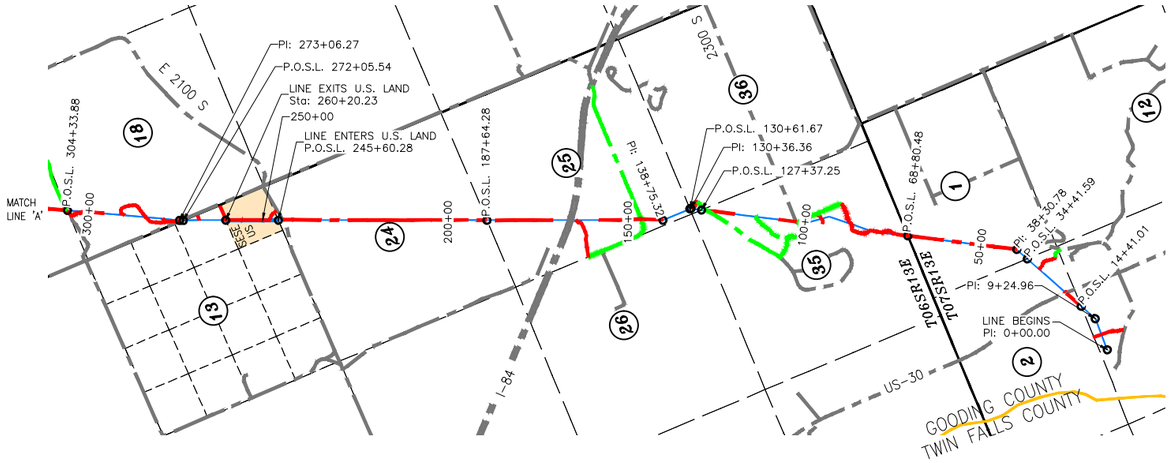
Figure 1

King to Wood River
Line 433

Overview Map

0 1.75 3.5 7 10.5 Miles

REVISION		
1	04/24/2012	Redrawn to AutoCAD, and updated landbase from IPC GIS and BLM PLSS. EMS



US LAND (OVERALL)

FEET OF LINE ON USLANDS-----	159429.2
MILES OF LINE ON USLANDS---------	30.2
ACRES OF LINE ON USLANDS--------	366.0

US LAND (GOODING COUNTY)

FEET OF LINE ON USLANDS------	99490.9
MILES OF LINE ON USLANDS---------	18.8
ACRES OF LINE ON USLANDS--------	228.4

US LAND (CAMAS COUNTY)

FEET OF LINE ON USLANDS------	42174.6
MILES OF LINE ON USLANDS---------	8.0
ACRES OF LINE ON USLANDS--------	96.8

US LAND (BLAINE COUNTY)

FEET OF LINE ON USLANDS------	17763.7
MILES OF LINE ON USLANDS---------	3.4
ACRES OF LINE ON USLANDS--------	40.8

SERVICE ROADS (OVERALL)

FEET OF ROADS ON USLANDS-----	172150.0
MILES OF ROADS ON USLANDS-------	32.6
ACRES OF ROADS ON USLANDS------	55.3

SERVICE ROADS (GOODING COUNTY)

FEET OF ROADS ON USLANDS-----	112082.1
MILES OF ROADS ON USLANDS--------	21.2
ACRES OF ROADS ON USLANDS--------	36.0

SERVICE ROADS (CAMAS COUNTY)

FEET OF ROADS ON USLANDS-----	41800.7
MILES OF ROADS ON USLANDS--------	7.9
ACRES OF ROADS ON USLANDS--------	13.4

SERVICE ROADS (BLAINE COUNTY)

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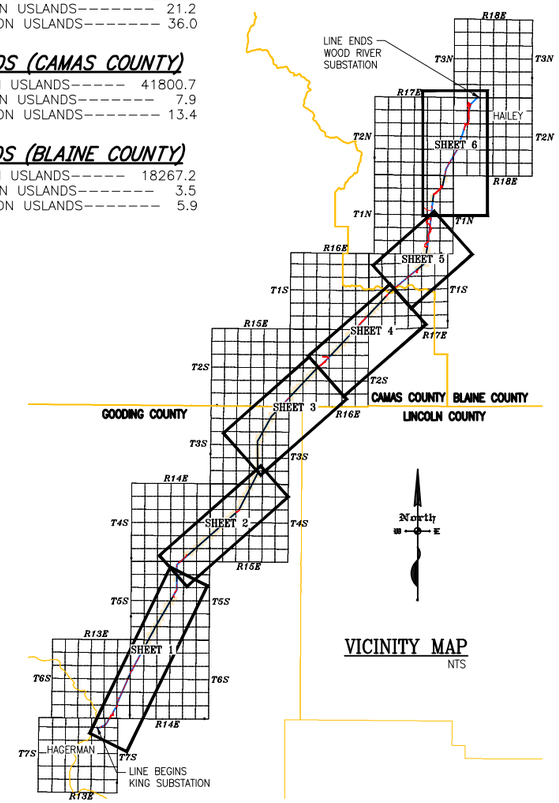

VICINITY MAP

NTS

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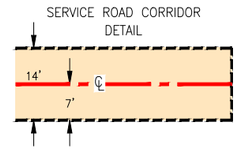
NOTE:

The service road corridor only applies to service roads that are on us lands and outside of the transmission line corridor.

SERVICE ROAD CORRIDOR DETAIL



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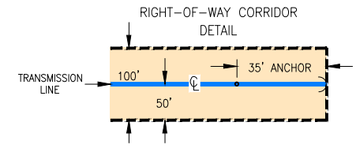


LEGEND:

- SECTION
- SECTION 1/16
- TOWNSHIP
- ACCESS ROAD CENTERLINE
- SERVICE ROAD CENTERLINE
- PUBLIC ROAD CENTERLINE
- TRANSMISSION LINE ALIGNMENT
- EASEMENT
- (13) SECTION NUMBER

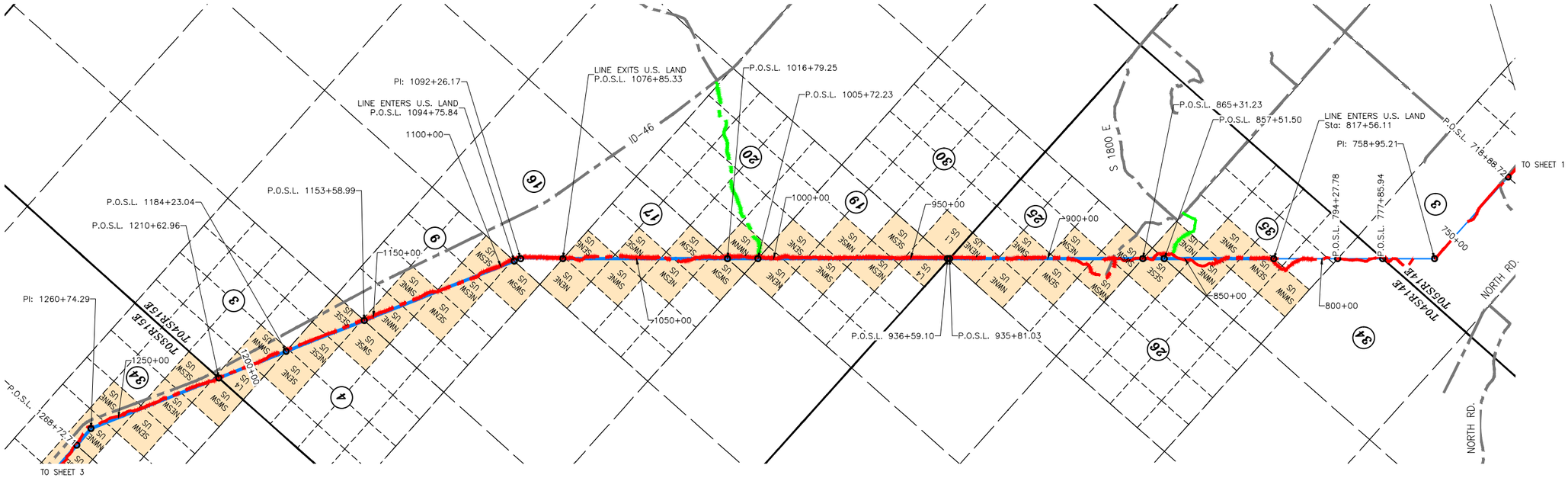
IDI-12961

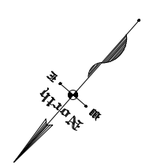
DETAIL MAP TO ACCOMPANY
APPLICATION FOR RIGHT OF WAY GRANT
KING-HAILEY
138KV TRANSMISSION LINE 433
CAMAS, GOODING CO. ID

IDAHO POWER COMPANY BOISE, IDAHO

SCALE: 1":2000'		DATE: DEC. 1981	
DS. ###	APPROVED	06 D- 16681001	
DR. EMS			
CH. ###		SHT. 1of6	54

REVISION		
1	04/24/2012	Redrawn to AutoCAD, and updated landbase from IPC GIS and BLM PLSS. EMS





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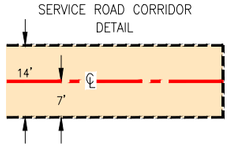

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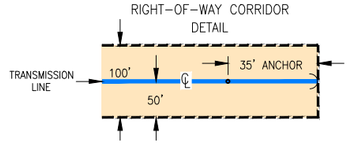

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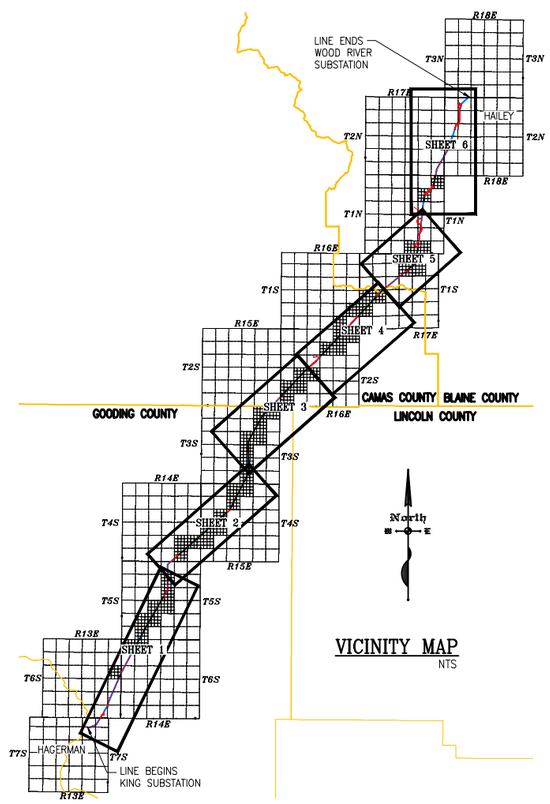

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IDAHO POWER COMPANY BOISE, IDAHO

SCALE: 1":2000'		DATE: DEC. 1981	
DS. ###	APPROVED	06 D– 16681001	
DR. EMS	K. Kelly		
CH. ###		SHT. 2of6	54

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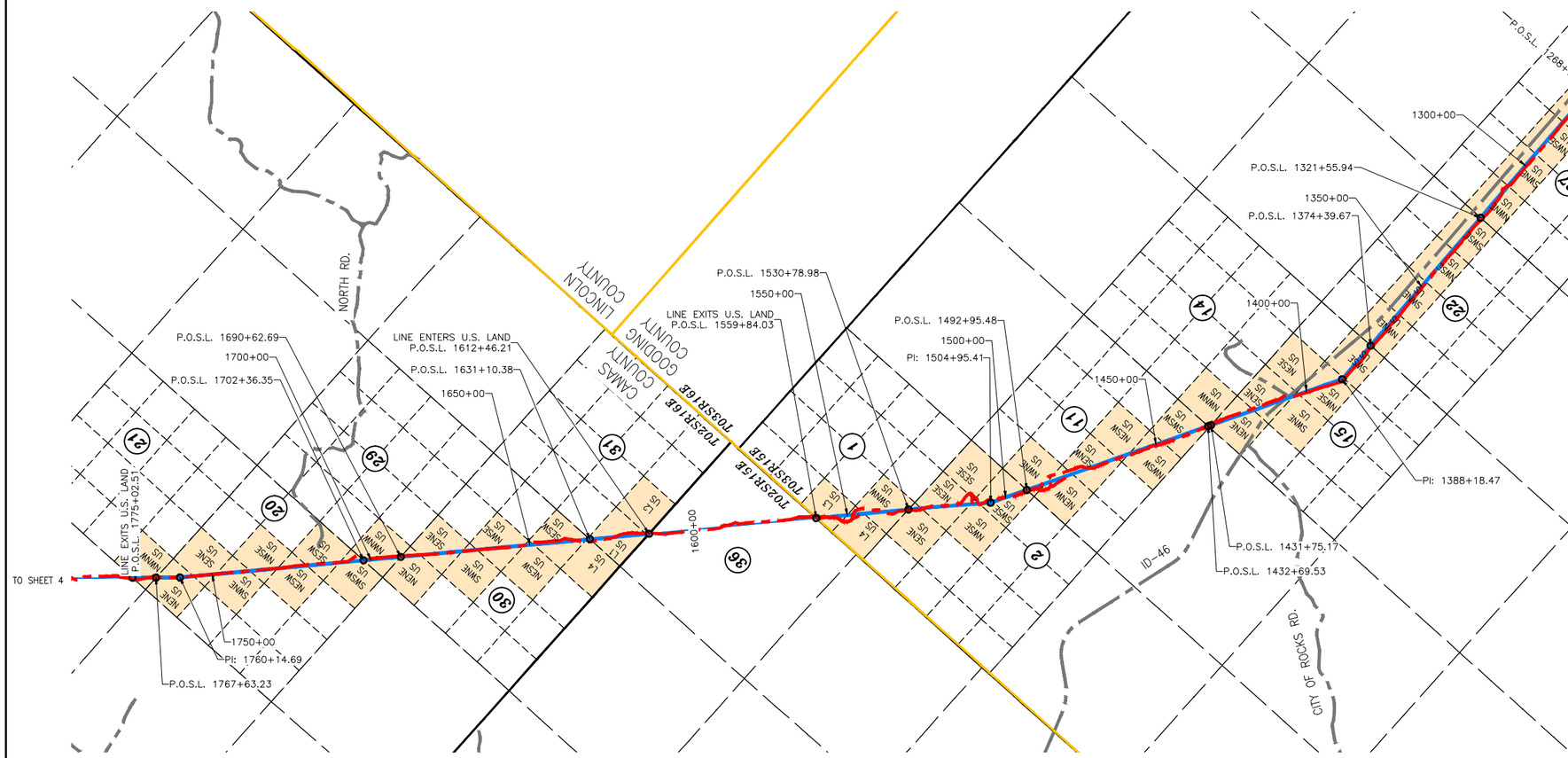

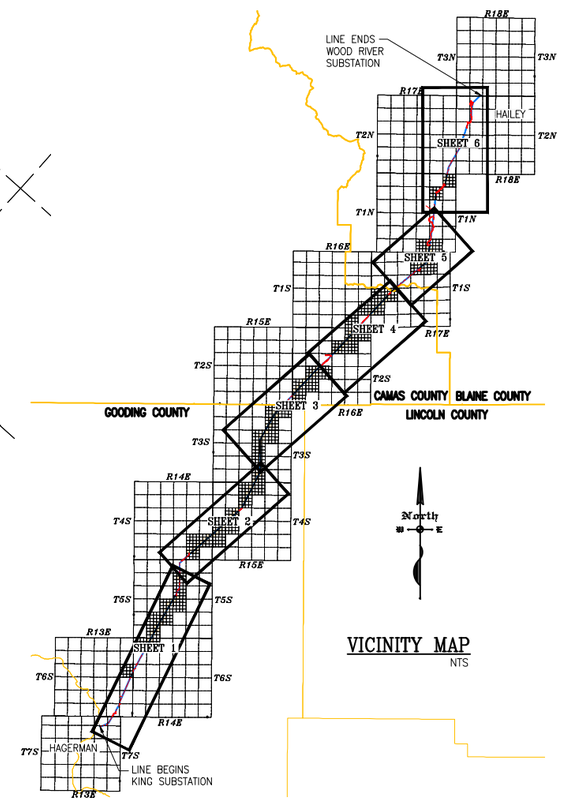

VICINITY MAP

NTS

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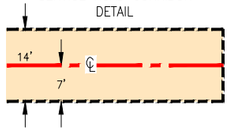
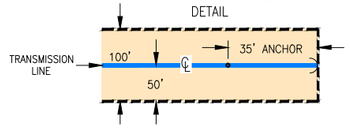


RIGHT-OF-WAY CORRIDOR DETAIL



LEGEND:

- SECTION
- SECTION 1/16
- TOWNSHIP
- ACCESS ROAD CENTERLINE
- SERVICE ROAD CENTERLINE
- PUBLIC ROAD CENTERLINE
- TRANSMISSION LINE ALIGNMENT
- EASEMENT
- (13) SECTION NUMBER

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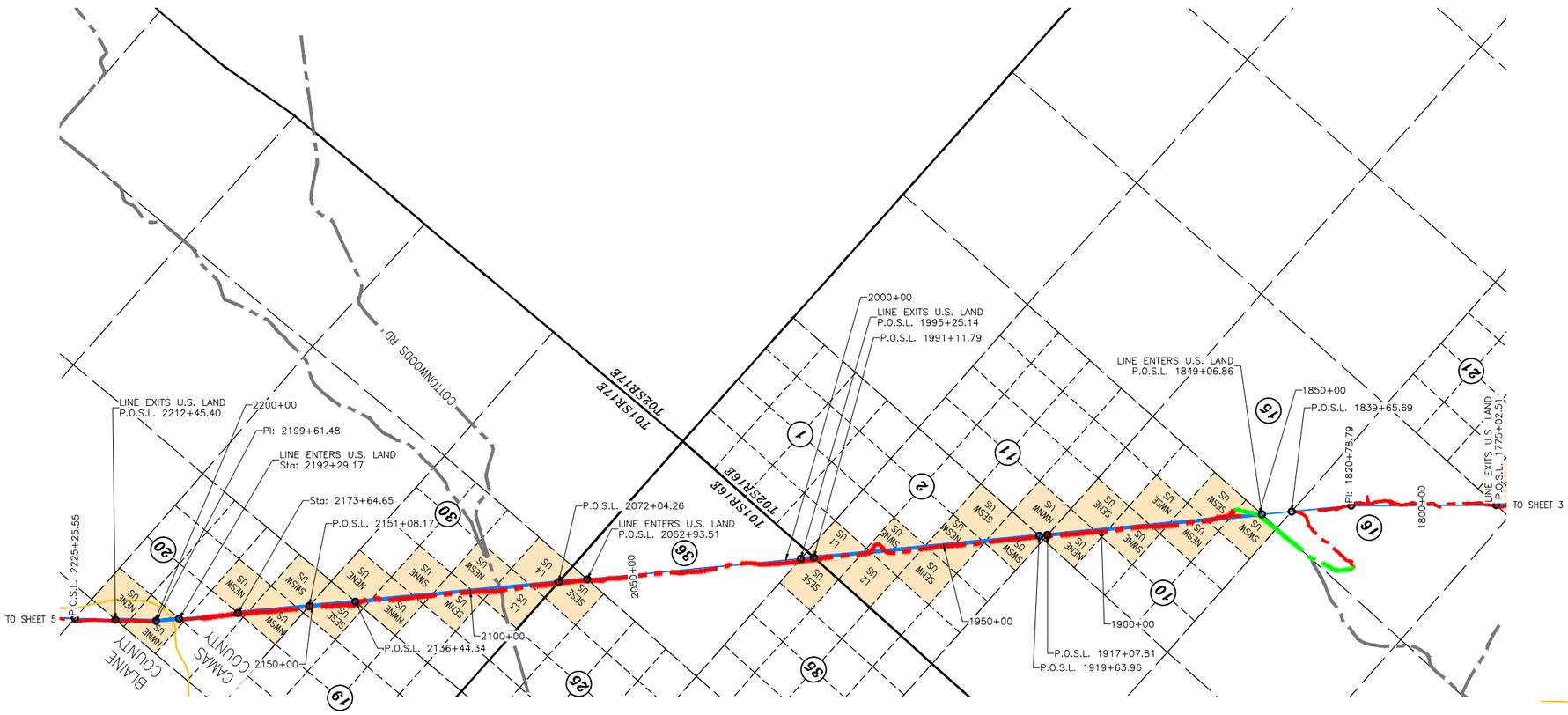
IDI-12961

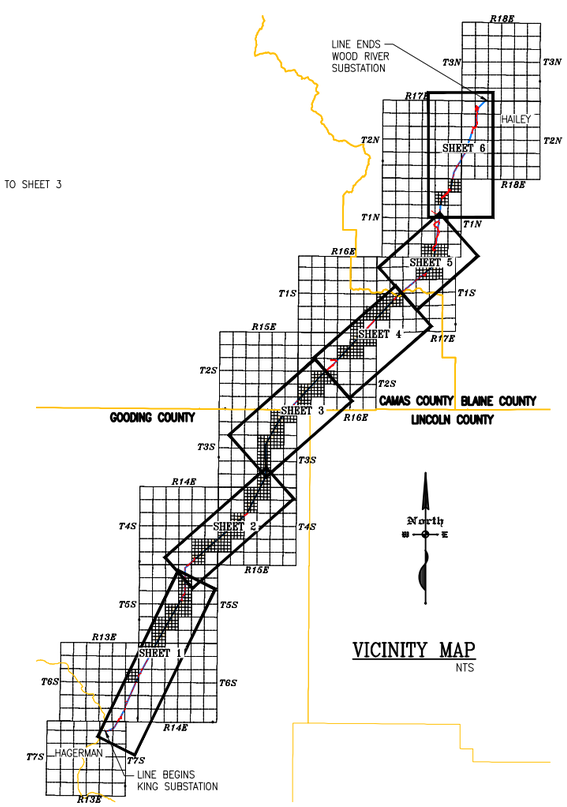
DETAIL MAP TO ACCOMPANY
APPLICATION FOR RIGHT OF WAY GRANT
KING-HAILEY
138KV TRANSMISSION LINE 433
CAMAS, GOODING CO. ID

IDAHO POWER COMPANY BOISE, IDAHO

SCALE: 1":2000'		DATE: DEC. 1981	
DS. ###	APPROVED	06 D- 16681001	
DR. EMS	K. Killing		
CH. ###		SHT. 3of6	54

REVISION	
1	04/24/2012
Redrawn to AutoCAD, and updated landbase from IPC GIS and BLM PLSS. EMS	





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KING-HAILEY
138KV TRANSMISSION LINE 433
CAMAS, GOODING CO. ID

IDAHO POWER COMPANY BOISE, IDAHO

SCALE: 1":2000'		DATE: DEC. 1981	
DS. ###	APPROVED	06 D- 16681001	
DR. EMS			
CH. ###		SHT. 4of6	54

REVISION	
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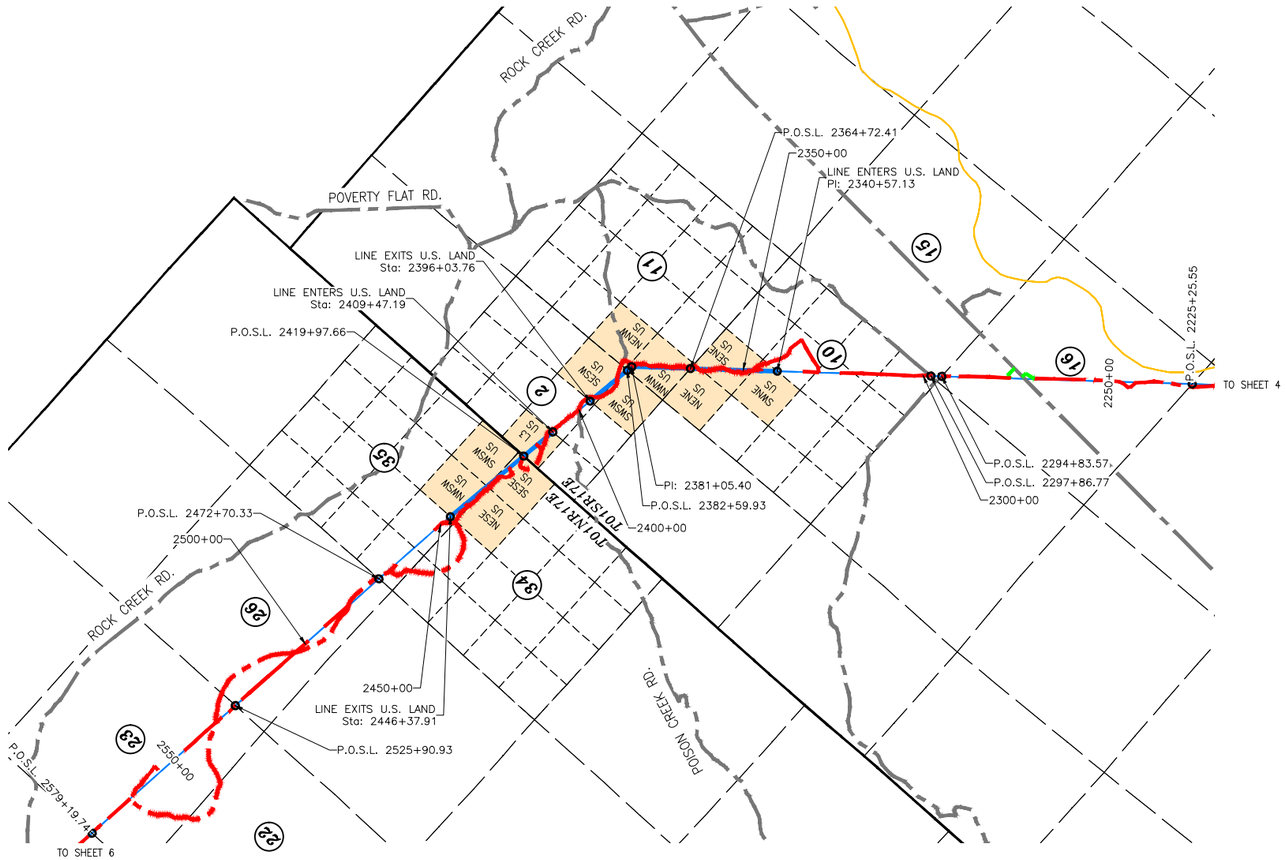
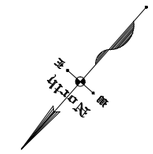
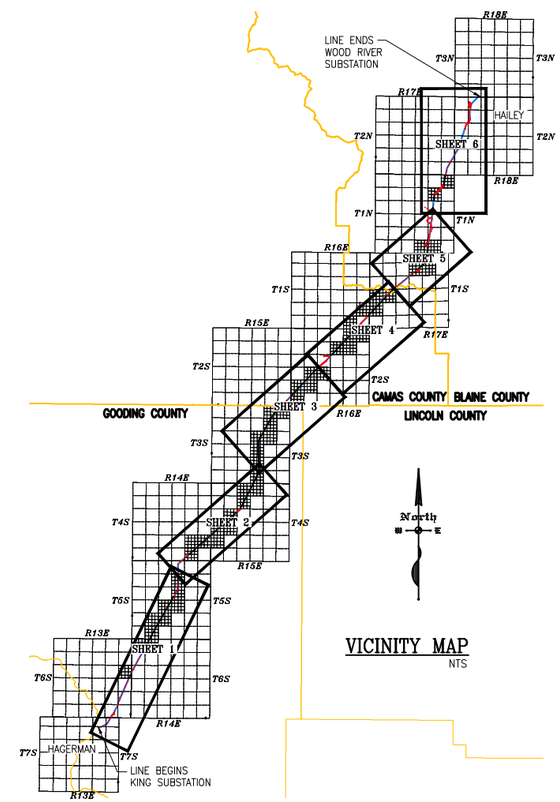
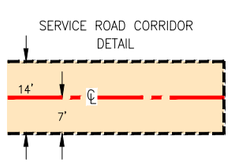
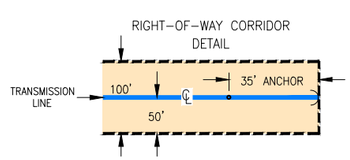






VICINITY MAP
NTS





LEGEND:

- SECTION
- SECTION 1/16
- TOWNSHIP
- ACCESS ROAD CENTERLINE
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IDI-12961

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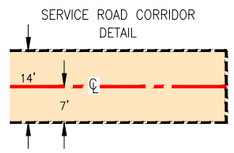
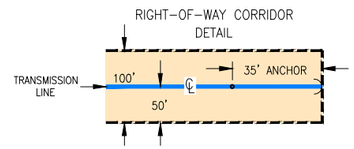
APPLICATION FOR RIGHT OF WAY GRANT
KING-HAILEY
138KV TRANSMISSION LINE 433
CAMAS, GOODING CO. ID

IDAHO POWER COMPANY BOISE, IDAHO

SCALE: 1":2000'		DATE: DEC. 1981	
DS. ###	APPROVED	06 D- 16681001	
DR. EMS	K. Kelly		
CH. ###		SHT. 5of6	54

REVISION	
1	04/24/2012
Redrawn to AutoCAD, and updated landbase from IPC GIS and BLM PLSS. EMS	





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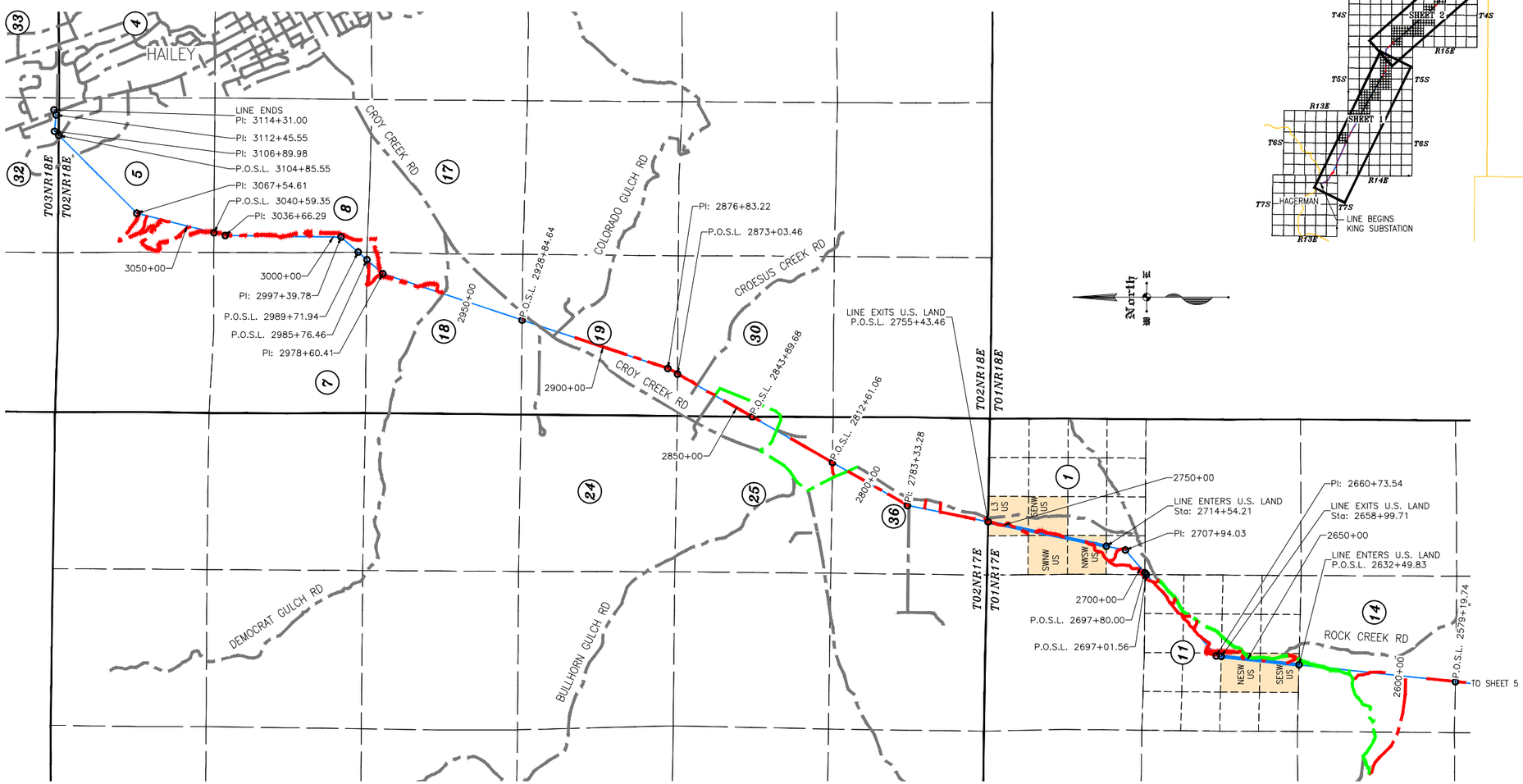
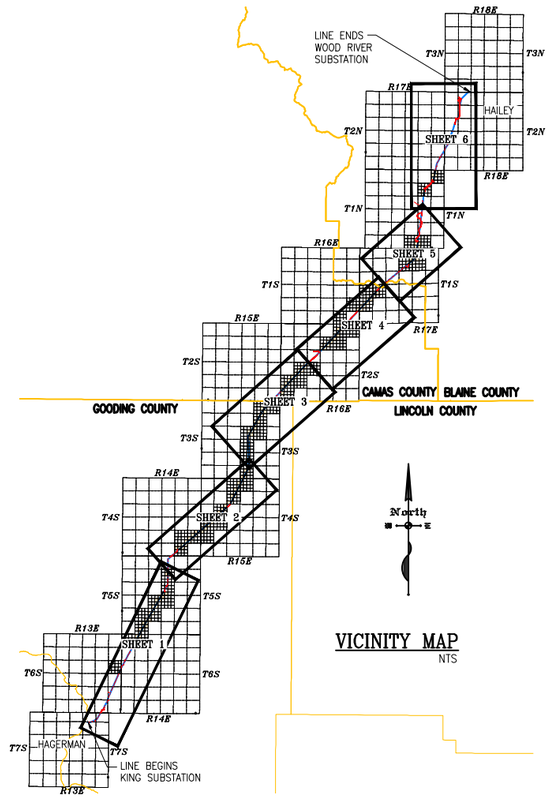
- SECTION 1/16
- TOWNSHIP
- ACCESS ROAD CENTERLINE
- SERVICE ROAD CENTERLINE
- PUBLIC ROAD CENTERLINE
- TRANSMISSION LINE ALIGNMENT
- EASEMENT
- (13) SECTION NUMBER





VICINITY MAP
NTS

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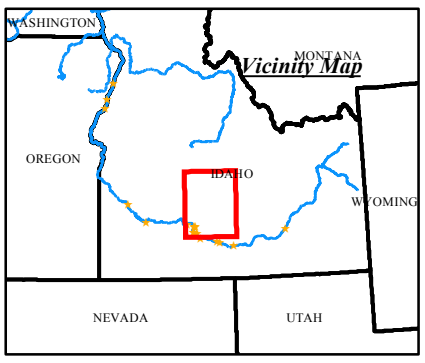
IDI-12961

DETAIL MAP TO ACCOMPANY
APPLICATION FOR RIGHT OF WAY GRANT
KING-HAILEY
138KV TRANSMISSION LINE 433
CAMAS, GOODING CO. ID

IDAHO POWER COMPANY BOISE, IDAHO			
SCALE: 1":2000'		DATE: DEC. 1981	
DS. ###	APPROVED	06D-16681001	
DR. EMS		SHT. 6of6	54
CH. ###			

Theme: \\fresno\Enviro_GIS\??.mxd

Wood River
Hailey
Moonstone
Silver
King
US-20
US-26
US-30
I-84
ID-46
ID-75
ID-24
US-93
ID-25
ID-79



Features Legend

- Substation
- Line 433
- Major Highways
- WoodRiver AlternativeRoutes

IDAHO POWER
An IDACORP Company

IDAHO POWER COMPANY, BOISE, ID 2013

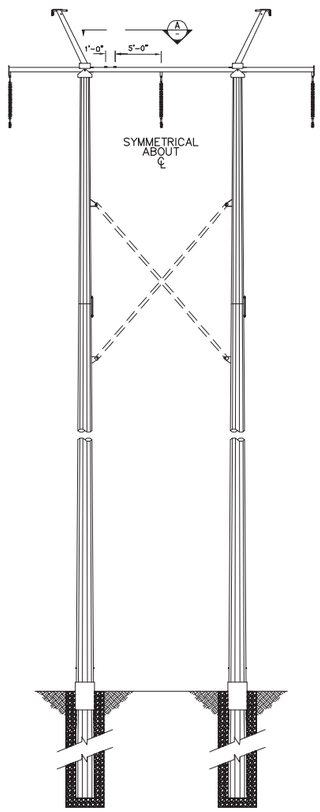
Figure 3

King to Wood River
Line 433

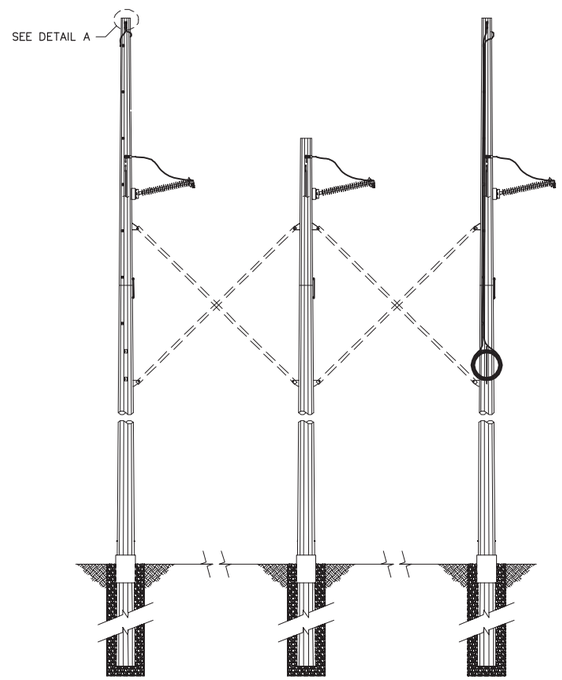
Alternatives Previously Considered

0 1.75 3.5 7 10.5 Miles

REVISION	
A	XX/XX/2013
PRELIMINARY REVIEW	
W.O. 27324626	
	IPC/HDR



H–FRAME
LOOKING AHEAD STATION



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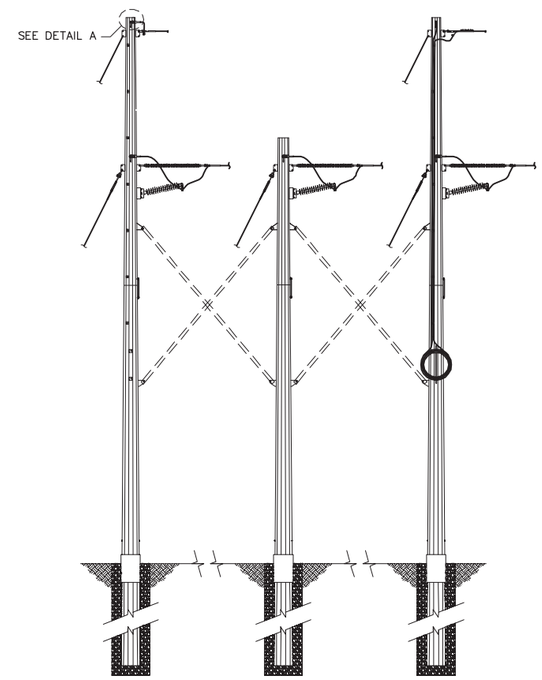

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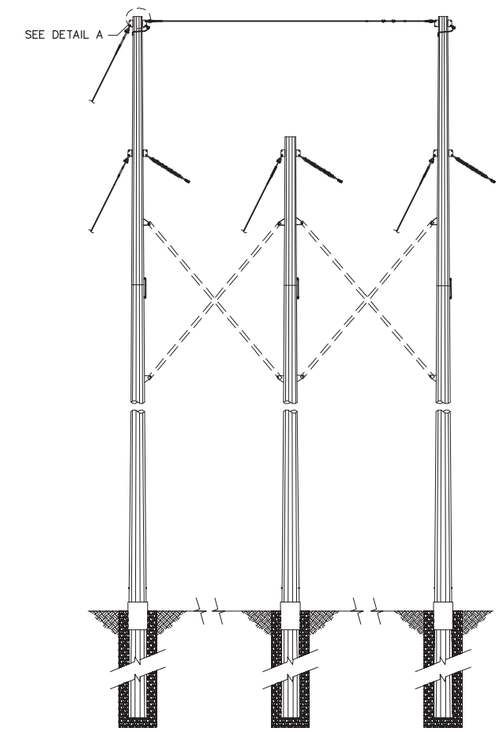
LOOKING AHEAD STATION



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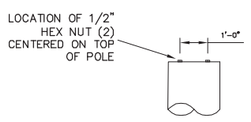
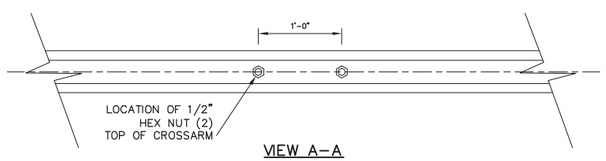
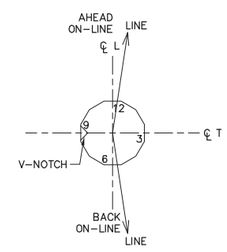


DETAIL A
SCALE: N.T.S.



VIEW A–A
SCALE: N.T.S.



POLE ORIENTATION

NOTES:

FOR STRUCTURE DIMENSIONS SEE LOAD AND DESIGN DRAWINGS.

FOR STRUCTURES 10, 20, 30, 40, 50, 60, 70, 80, 90, 100, 110 ,120, 130, 140, 150, 160, 170, 180, 190, 200, 210, 220, 230, 240, 250, 260, 270, 280, 290, 300, 310, 320, 330, 340, 350, 360, 370, 380, 390, 400, 410, 420, 430, 440, 450, 460, 470, 480

REFERENCE DRAWINGS

23D–64819	PLAN & PROFILE

KING–WOOD RIVER
138KV
AERIAL PATROL

IDAHO POWER COMPANY BOISE, IDAHO

SCALE: 3/16"=1'–0" DATE: XX/XX/2013

REV.			
A	DS. HDR	APPROVED	21D–65215–1A
	DR. HDR	–	SHT. 1 1
	CH. –––		

VAULT NO. 21D–65215–1A

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9/24/2013

IDAHO POWER
An IDACORP Company

Access Road - Category

NA, A, B, B / C, C, C / D, C / G, D, D / E, E, F, G

Other

Pulling Site
Idaho Power Ownership
Idaho Power ROW
Transmission
Structures - HDR
Fiber Slice
Private
BLM
Military
USFS
State
Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 1 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel1.mxd

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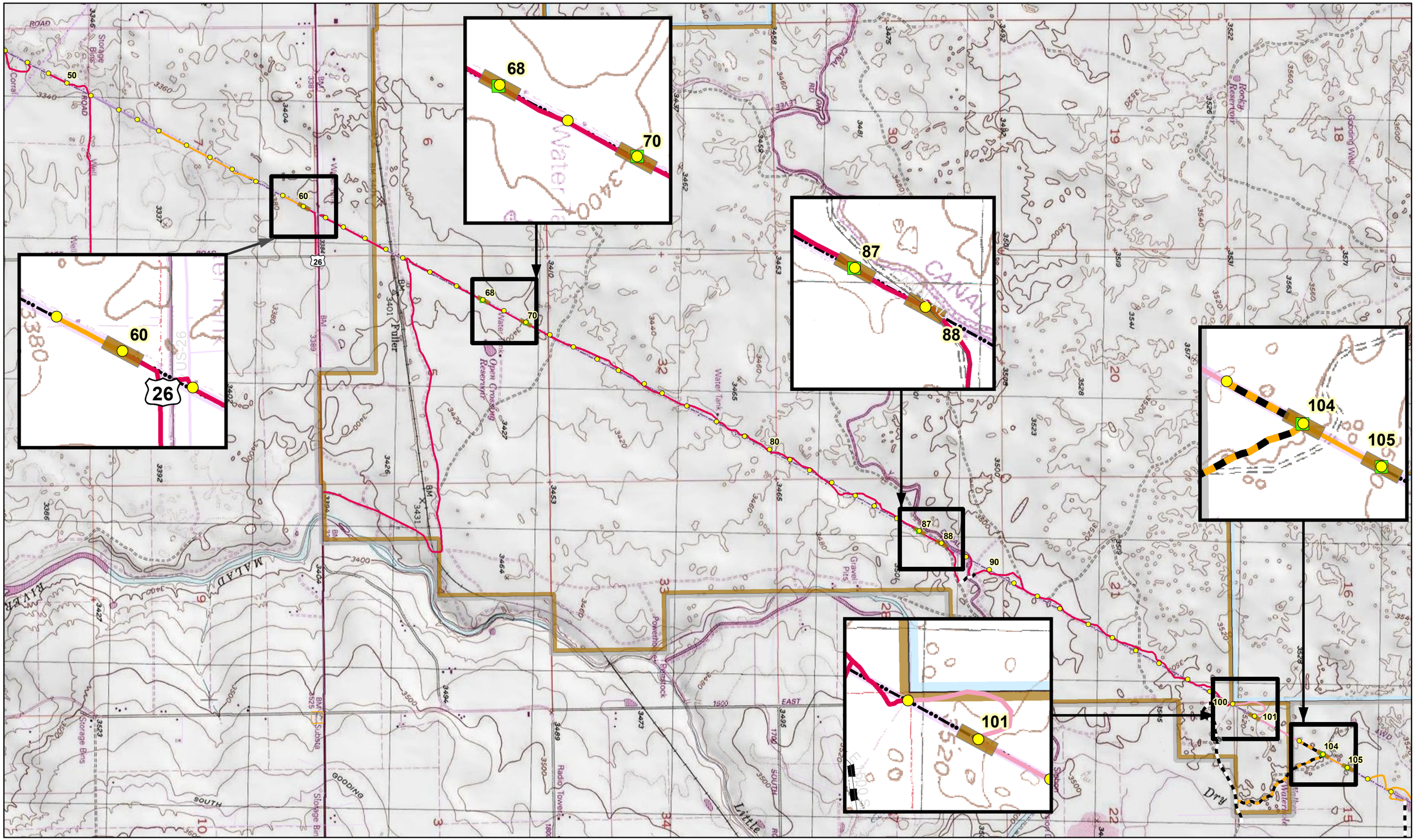

9/24/2013

IDAHO POWER
An IDACORP Company

Access Road - Category

NA, A, B, B / C, C, C / D, C / G, D, D / E, E, F, G

Other

Pulling Site
Idaho Power Ownership
Idaho Power ROW
Transmission
Structures - HDR
Fiber Slice
Private
BLM
Military
USFS
State
Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 2 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel2.mxd

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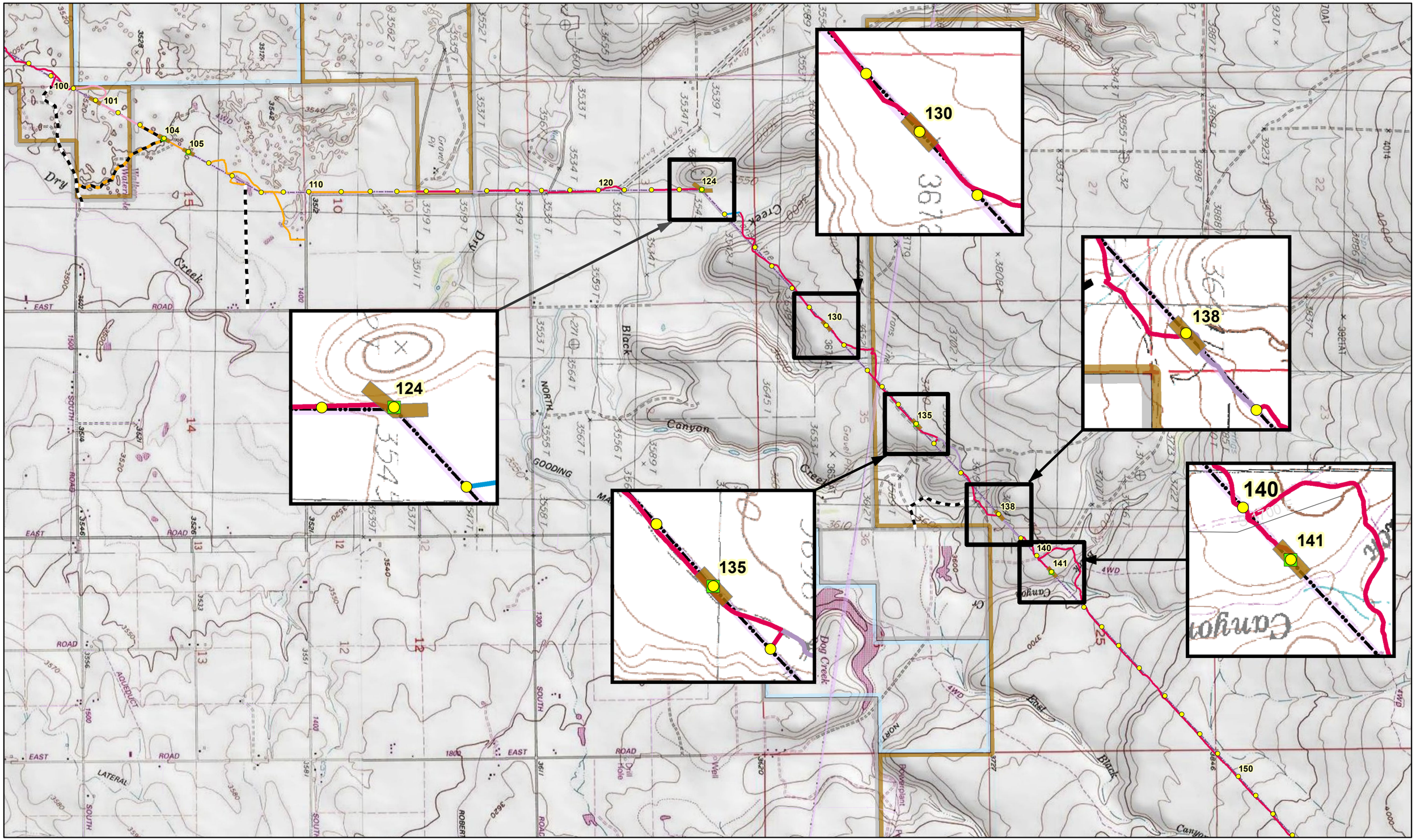

9/24/2013

IDAHO POWER
An IDACORP Company

Access Road - Category

NA, A, B, B / C, C, C / D, C / G, D, D / E, E, F, G

Other

Pulling Site
Idaho Power Ownership
Idaho Power ROW
Transmission
Structures - HDR
Fiber Slice
Private
BLM
Military
USFS
State
Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 3 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel3.mxd

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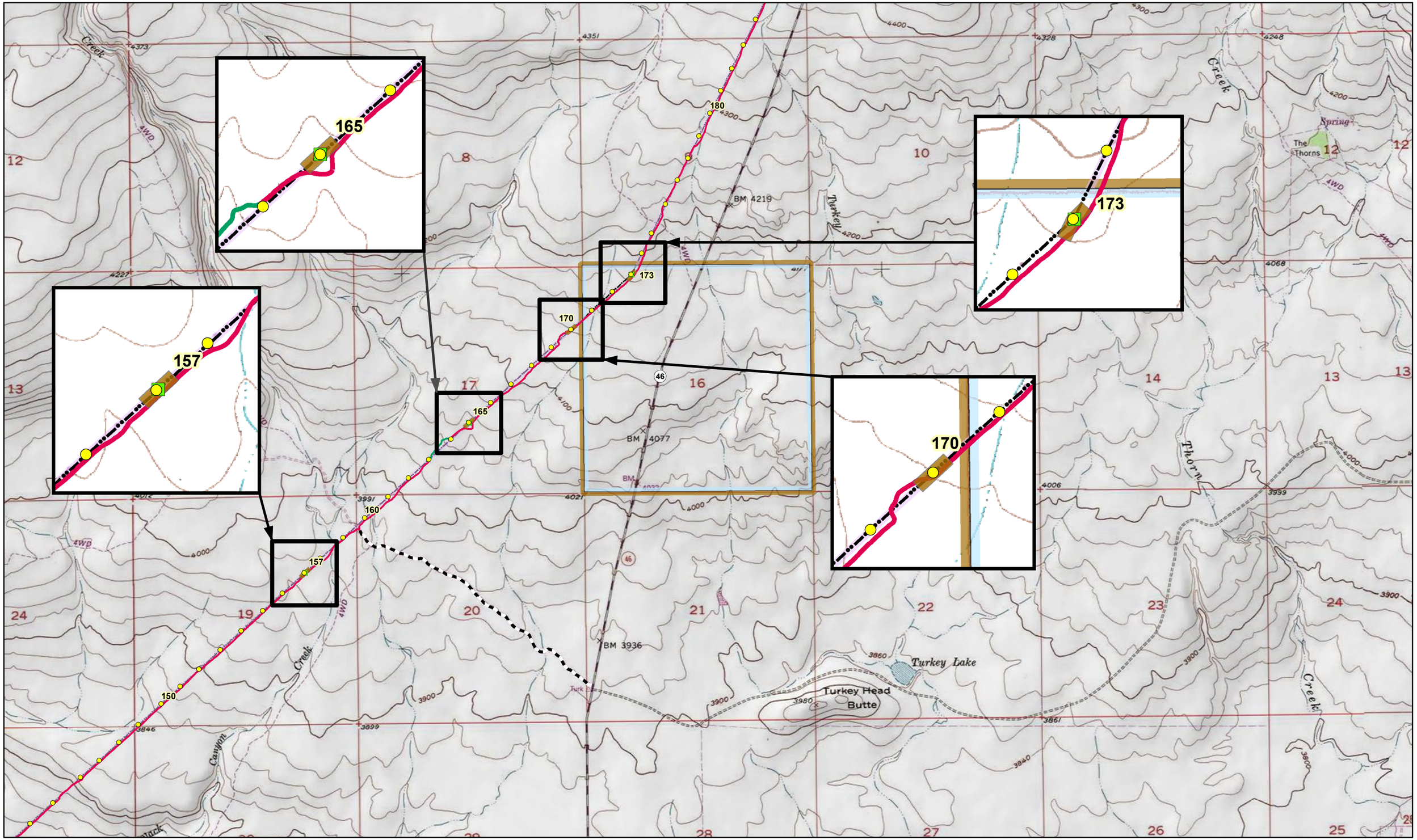

9/24/2013

IDAHO POWER
An IDACORP Company

Access Road - Category

NA, A, B, B / C, C, C / D, C / G, D, D / E, E, F, G

Other

Pulling Site
Idaho Power Ownership
Idaho Power ROW
Transmission
Structures - HDR
Fiber Slice
Private
BLM
Military
USFS
State
Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 4 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel4.mxd

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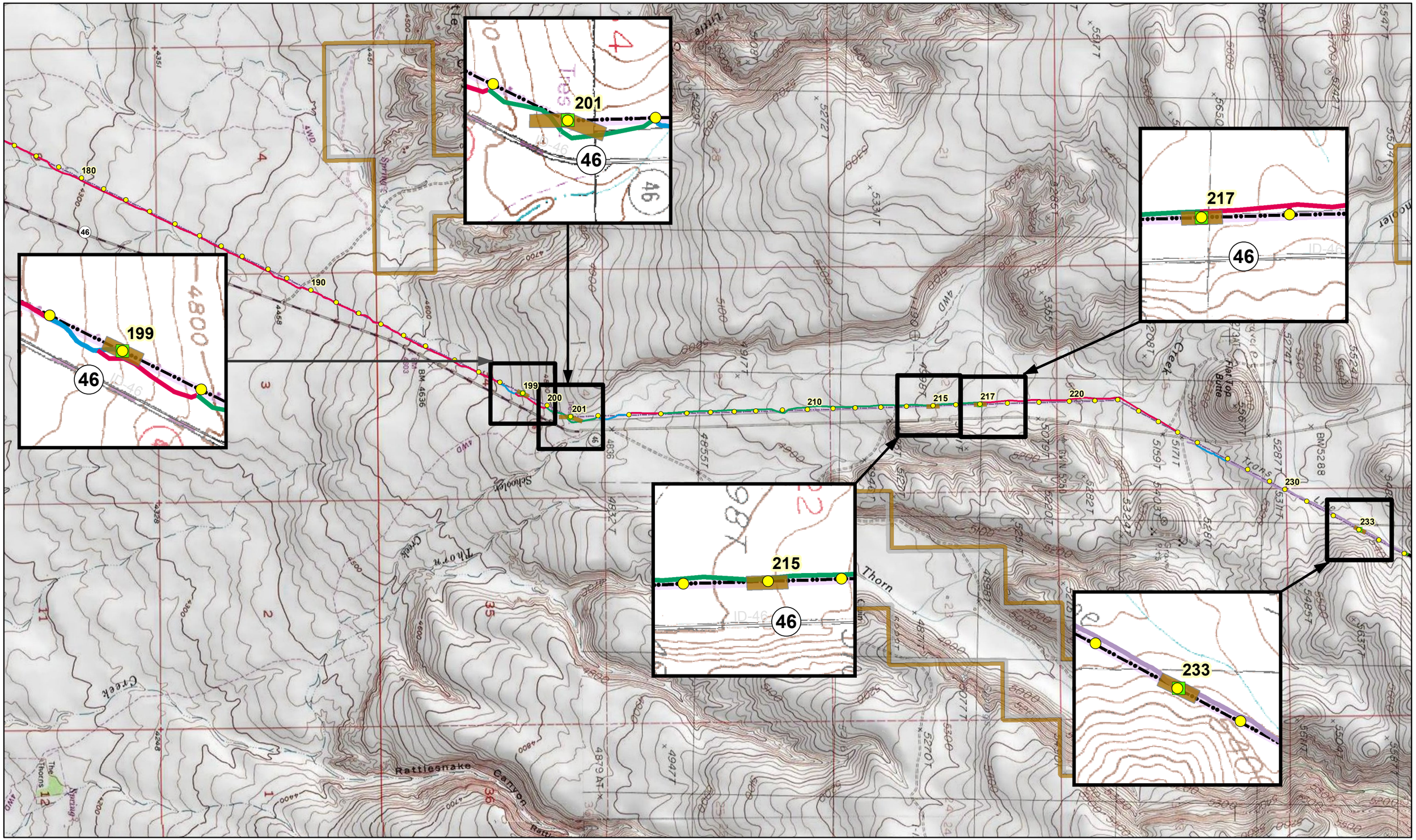

9/24/2013

IDAHO POWER
An IDACORP Company

Access Road - Category

NA, B / C, C / G, E
A, C, D, F
B, C / D, D / E, G

Other

Pulling Site
Idaho Power Ownership
Idaho Power ROW
Transmission
Structures - HDR
Fiber Slice
Private
BLM
Military
USFS
State
Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 5 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel5.mxd

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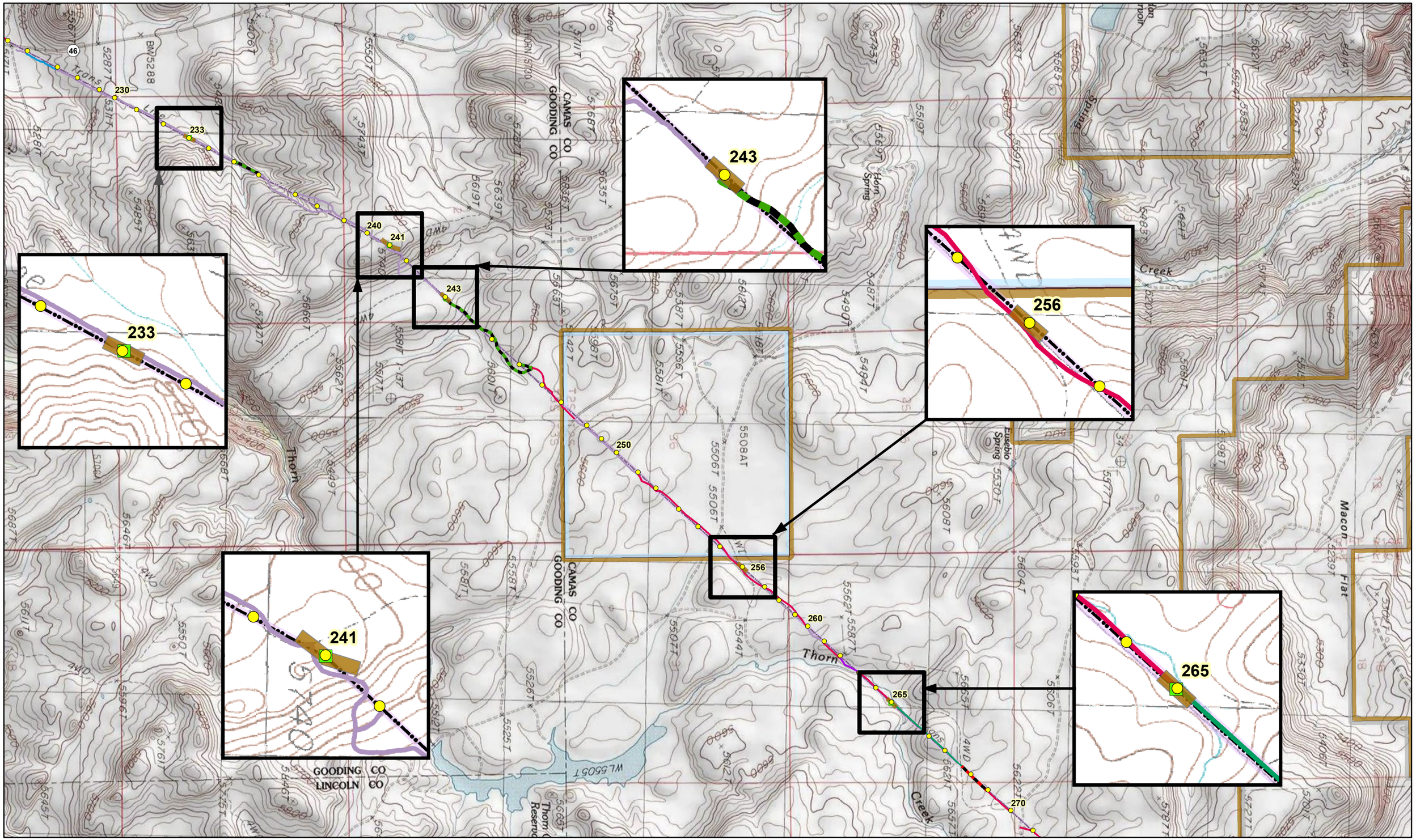

9/24/2013

IDAHO POWER
An IDACORP Company

Access Road - Category

NA | B / C | C / G | E
A | C | D | F
B | C / D | D / E | G

Other

Pulling Site
Idaho Power Ownership
Idaho Power ROW
Transmission
Structures - HDR
Fiber Slice
Private
BLM
Military
USFS
State
Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 6 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel6.mxd

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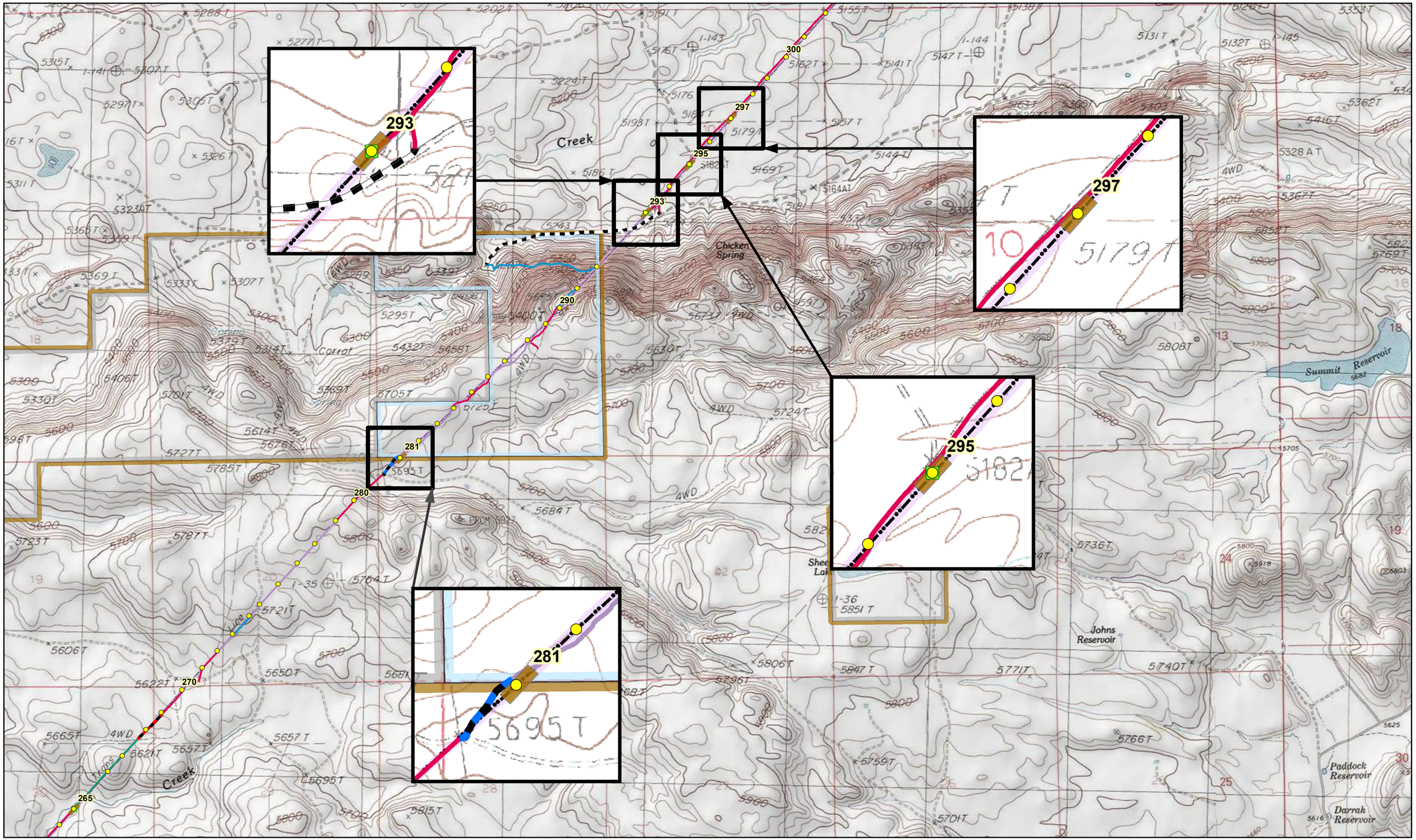

9/24/2013

IDAHO POWER
An IDACORP Company

Access Road - Category

NA, A, B, B / C, C, C / D, C / G, D, D / E, E, F, G

Other

Pulling Site
Idaho Power Ownership
Idaho Power ROW
Transmission
Structures - HDR
Fiber Slice
Private
BLM
Military
USFS
State
Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 7 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel7.mxd

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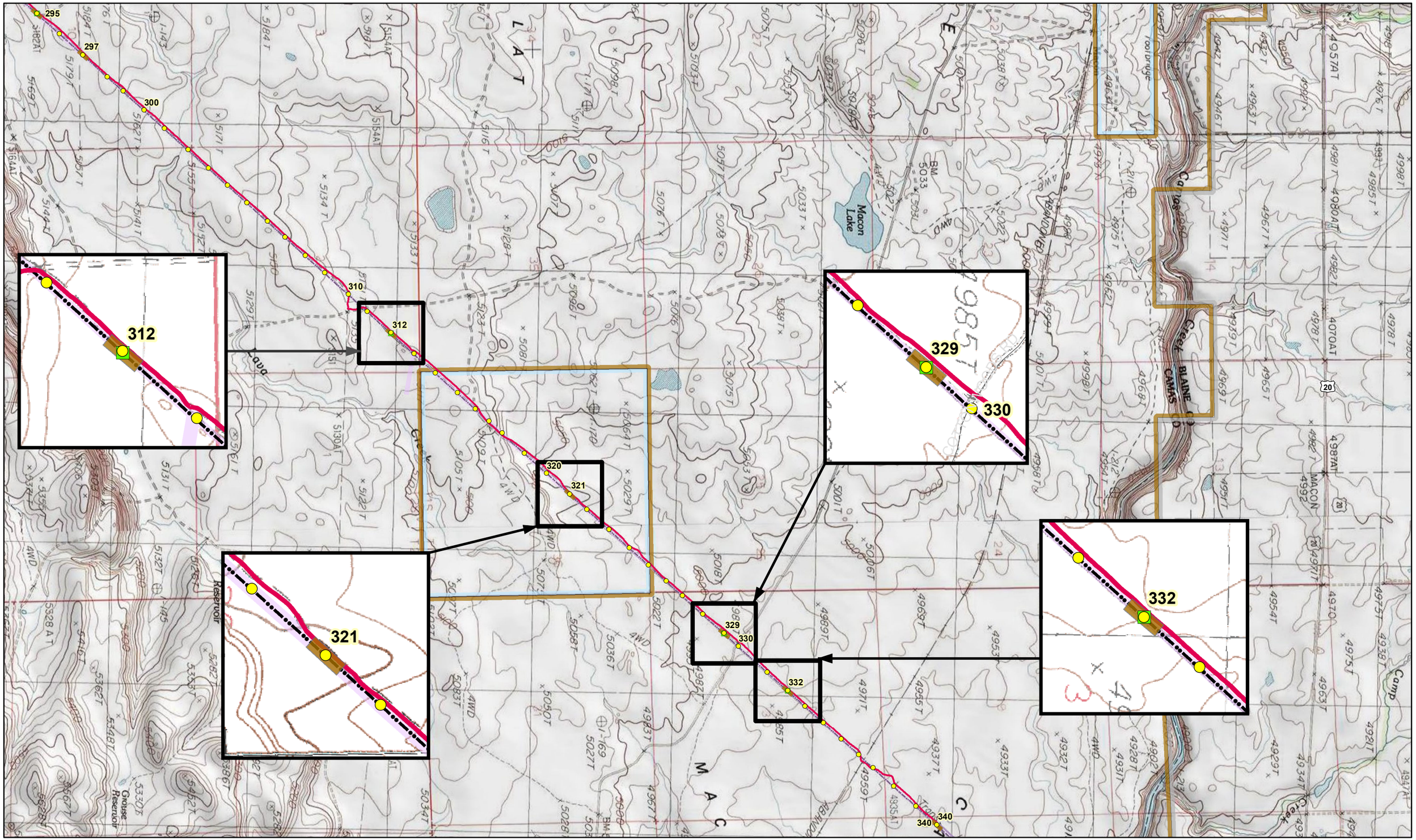

9/24/2013

IDAHO POWER
An IDACORP Company

Access Road - Category

NA, A, B, B / C, C, C / D, C / G, D, D / E, E, F, G

Other

Pulling Site
Idaho Power Ownership
Idaho Power ROW
Transmission
Structures - HDR
Fiber Slice
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BLM
Military
USFS
State
Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 8 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel8.mxd

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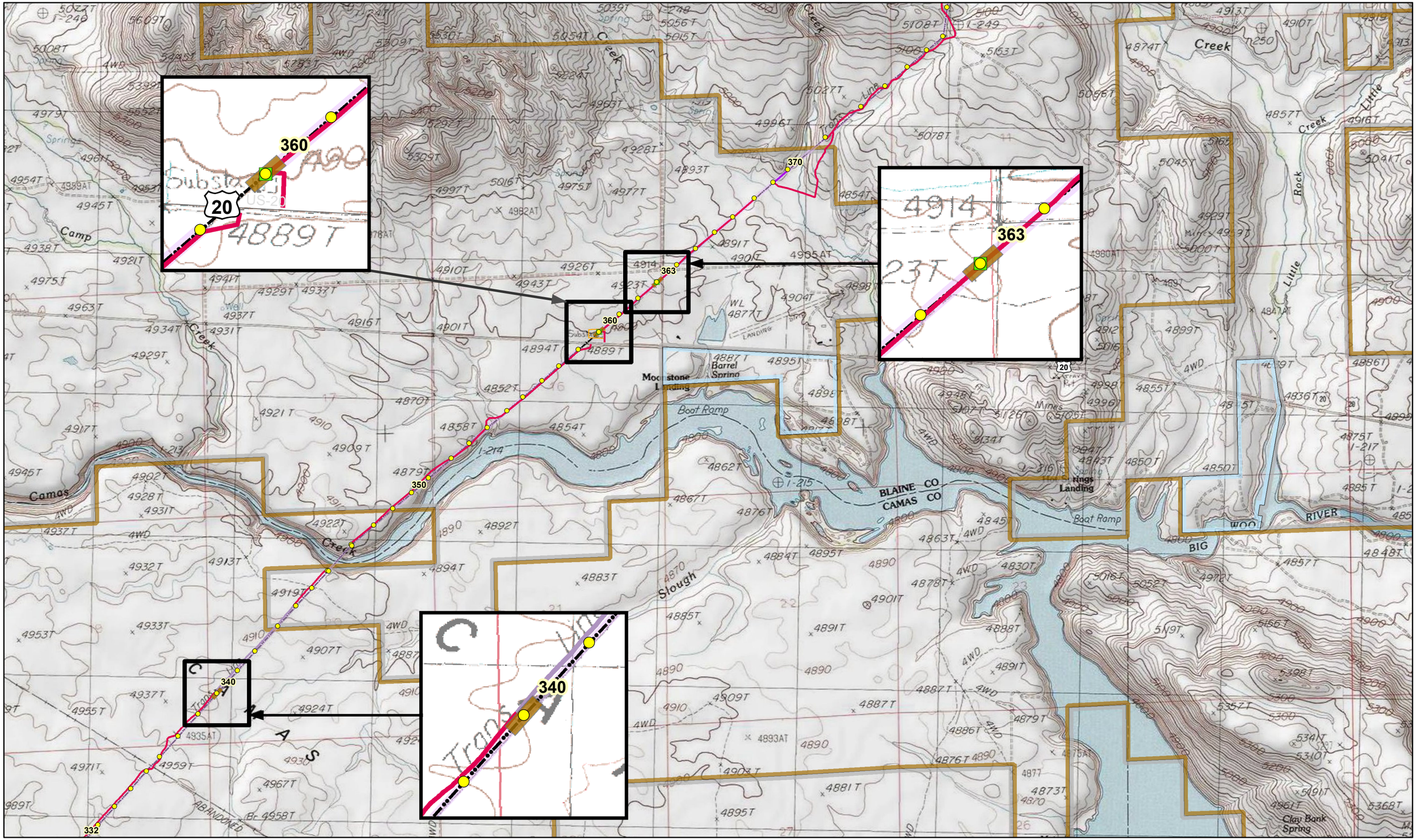

9/24/2013

IDAHO POWER
An IDACORP Company

Access Road - Category

NA, A, B, B / C, C, C / D, C / G, D, D / E, E, F, G

Other

Pulling Site
Idaho Power Ownership
Idaho Power ROW
Transmission
Structures - HDR
Fiber Slice
Private
BLM
Military
USFS
State
Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 9 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel9.mxd

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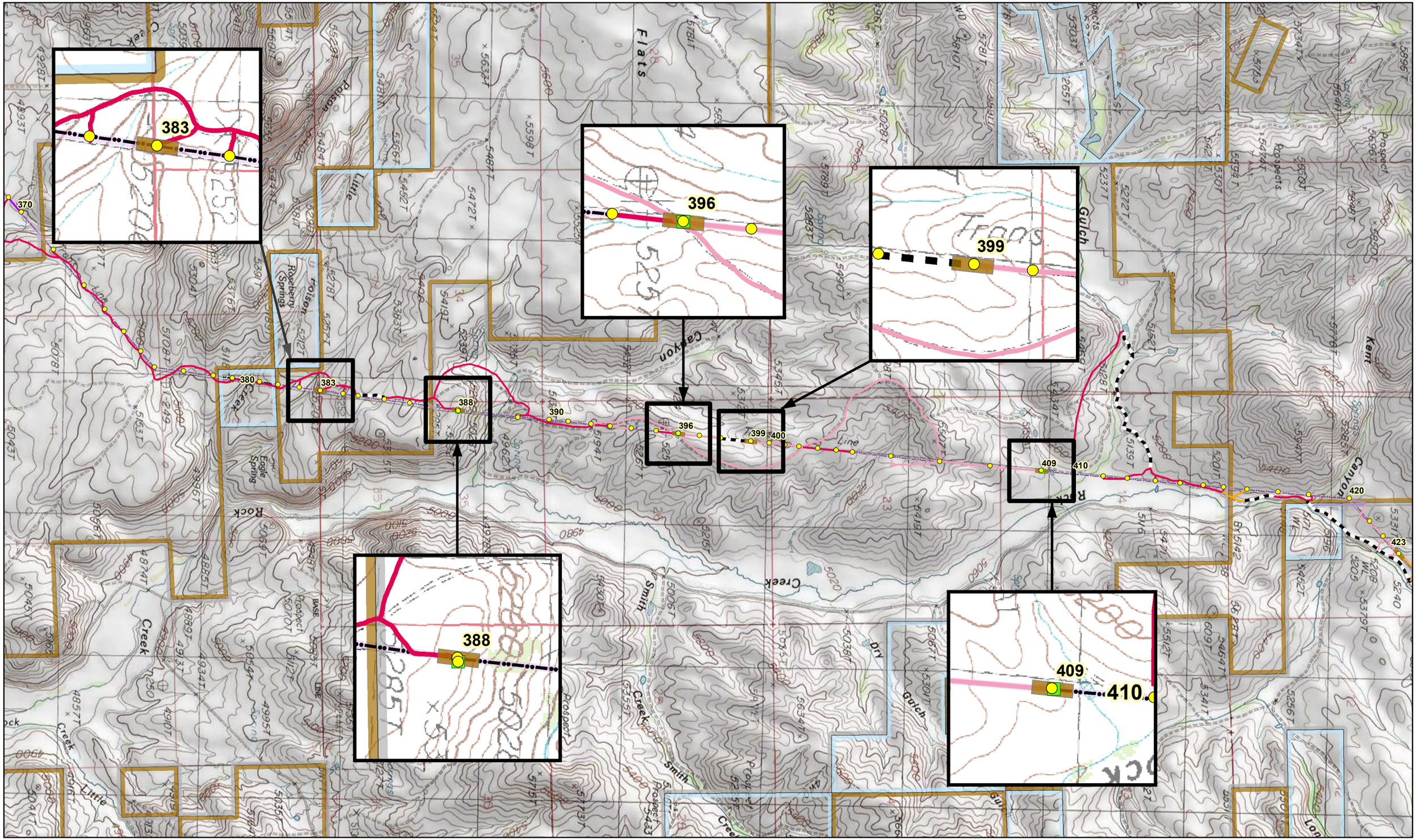

9/24/2013

IDAHO POWER
An IDACORP Company

Access Road - Category

NA, A, B, B / C, C, C / D, C / G, D, D / E, E, F, G

Other

Pulling Site
Idaho Power Ownership
Idaho Power ROW
Transmission
Structures - HDR
Fiber Slice
Private
BLM
Military
USFS
State
Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 10 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel10.mxd

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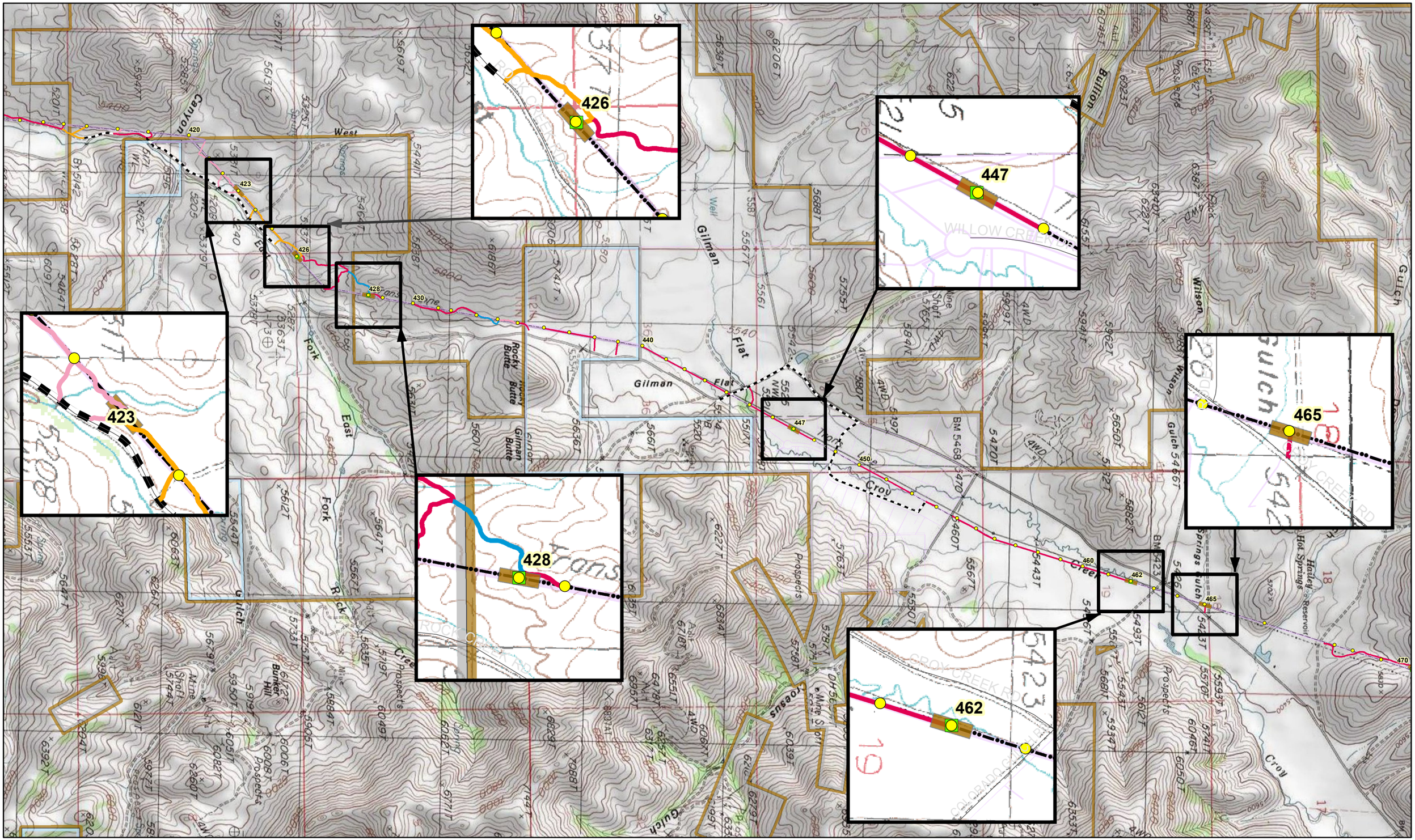

9/24/2013

IDAHO POWER
An IDACORP Company

Access Road - Category

NA | B / C | C / G | E
A | C | D | F
B | C / D | D / E | G

Other

Pulling Site
Idaho Power Ownership
Idaho Power ROW
Transmission
Structures - HDR
Fiber Slice
Private
BLM
Military
USFS
State
Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 11 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel11.mxd

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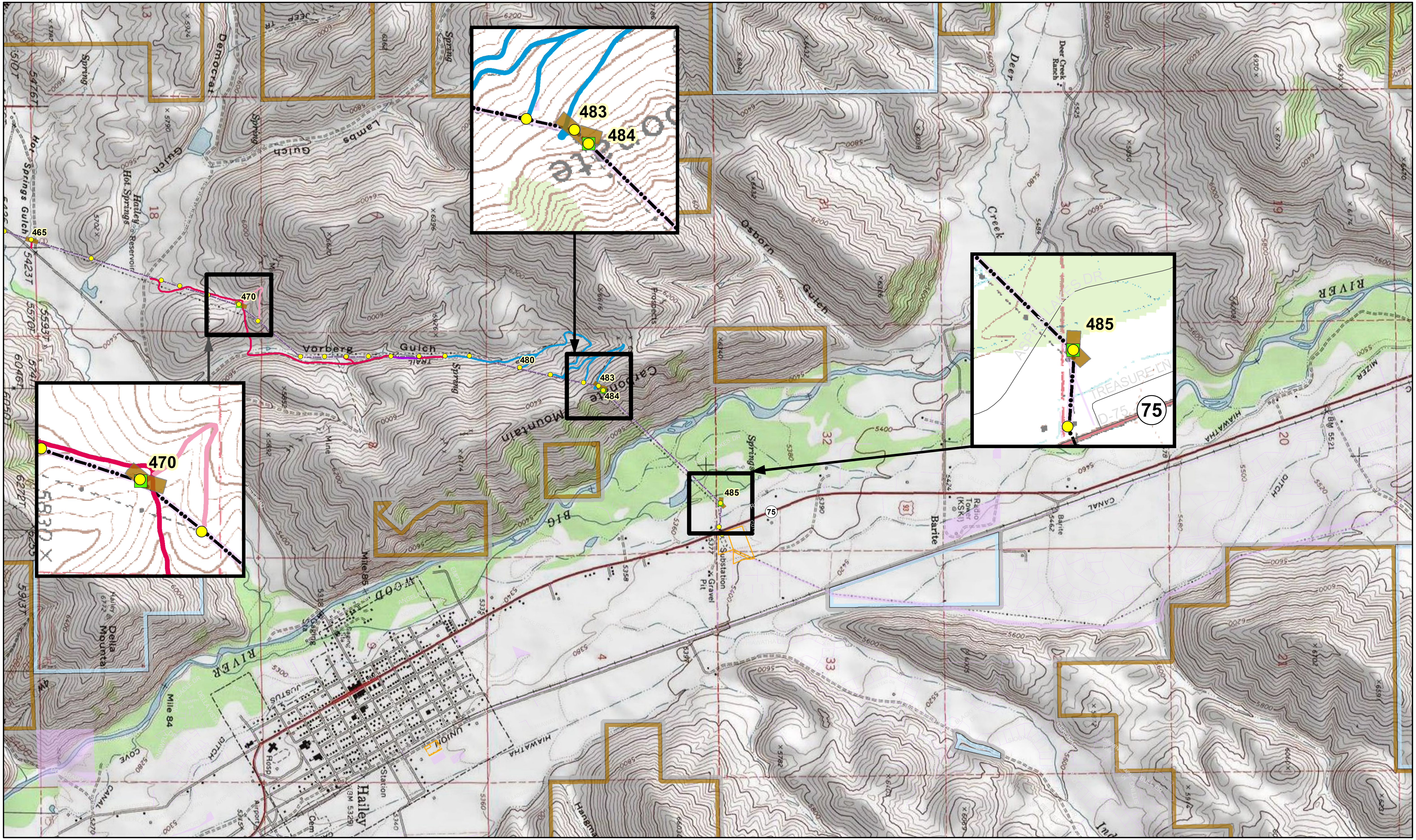

9/24/2013

IDAHO POWER® An IDACORP Company

Access Road - Category

NA	B / C	C / G	E
A	C	D	F
B	C / D	D / E	G

Other

Pulling Site	Transmission	Private	USFS
Idaho Power Ownership	Structures - HDR	BLM	State
Idaho Power ROW	Fiber Slice	Military	Tribal

NORTH

0 500 1,000 2,000 3,000 4,000 5,000 Feet

King - Wood River
138 KV TRANSMISSION LINE
Line 433

Panel 12 of 12

Path: \\fresno\Enviro_GIS\Terrestrial\ServiceTerritory\EnviroServices\KingtoWoodRiver_(Line 433)\MxdsBrian\Line433_Panel12.mxd

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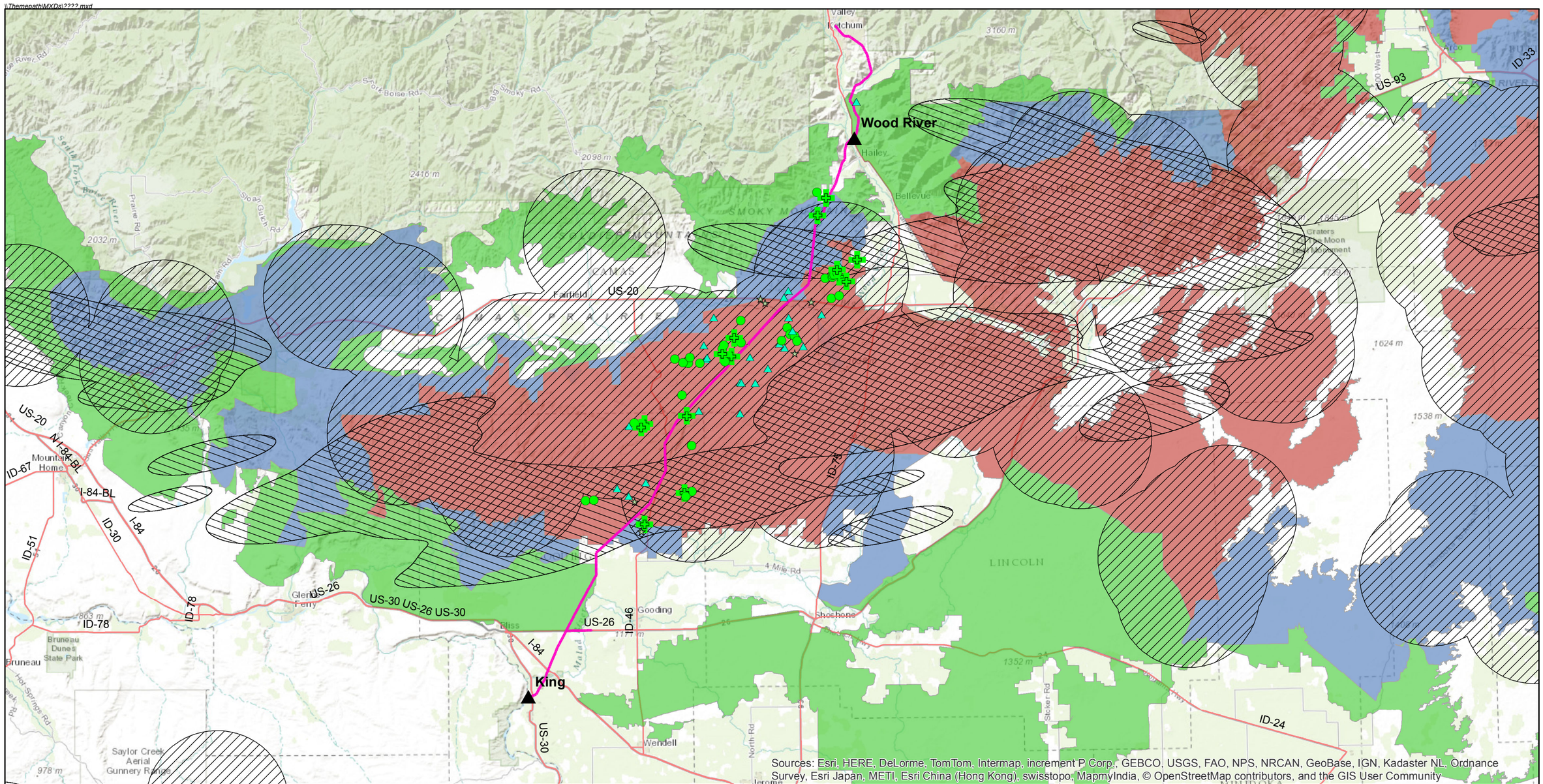

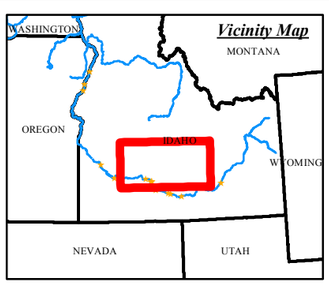

IDAHO POWER
An IDACORP Company

Features Legend

Greater-sage grouse Leks 2014within 4 mile

- Not verified
- Occupied
- Undetermined
- Unoccupied
- Substation
- King to Wood River (Line 433)

Habitat Management Areas

- GHMA
- IHMA
- PHMA
- Nesting / Late Brood Habitat
- Winter Habitat

0 410 820 1,640 Feet
0 125 250 500 Meters

Date: 8/4/2015

King to Wood River 138 Kilovolt Transmission Line Rebuild (IDI-12961)

Environmental Assessment # DOI-BLM-ID-T030-2014-0007-EA

Greater Sage-grouse Leks and BLM Habitat

Idaho Power Transverse Mercator (IPTM)
Units: Feet (US Survey Feet)
Horizontal Datum: NAD83, Vertical Datum: NAVD88
Scale Factor at Central Meridian: .99960
Longitude of Central Meridian: -115 30 00, Latitude of Origin: 42 00 00
False Easting: (Meters) 500000 or (US Survey Feet) 1640416.666667
False Northing: (Meters) 100000 or (US Survey Feet) 328083.333333.

Appendix 1
Contact information for key personnel (December 2015)

Role	Contact Information
BLM – Shoshone Field Office	
Emergency Contacts	
Fire Reporting/Management	1-800-974-2373 – South Idaho Interagency Dispatch Center
Hazmat Reporting	(208) 732-7414 – Tom Askew
Law Enforcement	(208) 735-2352 – BLM Law Enforcement Officer
Administrative Contacts	Shoshone Field Office 400 West F Street Shoshone, ID 83352
General	Shoshone Field Office (208) 732-7200 Codie Martin (208) 732-7227 (Field Manager) Kasey Prestwich (208) 732-7204 (Realty Specialist)
Idaho Power Company	
Emergency Contact	System Dispatch (208) 388-2826
Administrative Contacts	Idaho Power Company P.O. Box 70 1221 W. Idaho St. Boise, ID 83707
General Operation & Maintenance	Transmission & Distribution Maintenance Dept. (208) 388-2200
Environmental & Archaeology	Brett Dumas (208) 388-2330 (Environmental Supervisor) Shane Baker (208) 388-2925 (Archeologist) Stacey Baczkowski (208) 388-5093 (Environmental Services) Ron Piston (208) 388-6438 (Environmental Services)

Appendix 2.
Detailed Design

Appendix 2 contains Idaho Power Company Critical Energy Infrastructure Information (CEII). Distribution of this information must be limited to parties that have entered into a non-disclosure agreement with Idaho Power Company and have a need to know.

Plan and profile drawings are provided on CD.

Appendix 3
Equipment Examples

The following examples represent typical equipment that may be used for the rebuild and O&M activities. Other, more specialized equipment may be used in emergencies (e.g., fire fighting activities; replacement of a structure; replacing conductor). When necessary, work pads may be graded for the safe operation of equipment (e.g., sloped areas). A safe equipment work pad is typically two times the length of the vehicle and two feet on either side of the vehicle.

Altec AA600 Single Axle, Two Man Bucket with an Open Hydraulic System.

Wheel Base: 170”
Overall Length: 27’1”
Gross Weight: 30,000 lbs
Use: Structure repair and maintenance

D1090 Altec Digger

Wheel Base: 13’7 “
Overall Length: 29’5”
Gross Weight: 46,000 lbs
Use: Pole placement

Skid Steer

Wheel Base:
Overall Length:
Gross Weight:
Use: Small grading jobs; attachment for mulching (Slash Buster)

Hardline Puller with a Single Drum of 20,000' of 3/4 Steel Cable

Overall Length: 29’6”
Gross Weight: 64,000 lbs
Use: Stringing conductor

Three-Drum Tensioner

Overall Length: 40’
Gross Weight: 34,000 lbs
Use: Stringing conductor

Appendix 4.
Master Agreement – without Appendices

Bureau of Land Management

Master Agreement

U. S. Department of the Interior, Bureau of Land Management, Idaho and Idaho Power Company for Managing Rights-of-Way

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VI. ROUTINE OPERATIONS AND MAINTENANCE and EMERGENCY- PROMPTED ACTIVITIES ON FUTURE IPC ROWs and/or ROW AMENDMENTS AND RENEWAL ACTIONS 11
VII. IPC ROW PROJECT TEAM 12
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I. PURPOSE

The purpose of this Master Agreement (MA) is to establish an agreement between the United States Department of the Interior, Bureau of Land Management, Idaho (BLM) and Idaho Power Company (IPC) (the Parties) to: (1) improve communications between the Parties regarding electric lines and ancillary facility rights-of-way (ROW) on the National System of Public Lands (public lands) where IPC has a direct interest and is or will be the ROW holder; (2) clarify what are routine operation and maintenance (O&M) activities associated with existing IPC ROW grants; and (3) establish the IPC ROW Project Team to address outstanding IPC ROW trespass and process IPC realty actions for ROWs on public land in Idaho. Ambiguities in this agreement shall be interpreted so as to further the purpose of the Agreement.

II. AUTHORITY

This MA is authorized by the Federal Land Policy and Management Act (FLPMA) of 1976, as amended (43 U.S.C. 1701 et seq.) and appurtenant regulations found at Title 43 of the Code of Federal Regulations (CFR), 43 Part 2804.17.

III. GENERAL AGREEMENT (by both Parties)

A. This MA applies only to the public land administered by Idaho BLM and IPC's power lines/power facilities in Idaho.

B. This MA establishes procedures applicable to existing and future IPC ROW grants.

C. This MA does not change existing statutory or regulatory requirements; rather, it provides for consistent interpretation of laws, regulations and policies. BLM and IPC acknowledge that both parties must comply with other applicable laws, regulations and BLM national policies.

D. Nothing in this MA commits the BLM to issue a favorable ROW decision in any given instance.

E. Only BLM line officials (Field Manager, District Manager or State Director) with the proper delegation of authority can issue decisions concerning ROWs.

F. At any time, IPC may raise issues to the appropriate line manager, beginning with the Field Manager.

G. Large and/or complex projects with a defined BLM Project Manager or where BLM Idaho is not the lead agency are not subject to this agreement.

H. Nothing in this MA shall limit IPC's right to appeal BLM decisions or seek appropriate administrative or legal relief.

I. The Parties agree to the clarification of routine operations and maintenance (O&M), emergency-prompted activities, and the framework/responsibilities of the IPC ROW Project Team and the process for ROW actions as described in this MA.

J. The Parties agree to training of IPC work crews to cover identification and protection of biological and cultural resources and basic and wildland fire training (Appendix A). The Parties will jointly develop the appropriate training; the training may be formal or informal.

IV. COMMUNICATIONS (by both Parties)

This section has been developed to provide a process to improve communications between the Parties in order to better address the issues associated with IPC ROW activities on public lands and to avoid the costs associated with administrative and/or legal remedies. Therefore, the Parties agree to develop a 5-year Work Plan that will be a guide from which the IPC ROW Project Team may work. Each year the plan will be reviewed by both Parties and may be revised to set work priorities for the upcoming year. To assist with setting the priorities for the upcoming year, IPC will provide BLM with a copy of its upcoming yearly operation and maintenance schedule for Idaho.

The Parties will meet annually during the fourth quarter of the calendar year to plan for the coming calendar year; ideally during a BLM Idaho Leadership Committee (ILC) meeting. The purpose of this meeting will be to share information, address statewide IPC ROW issues (including IPCs proposed short- and long-term ROW projects or major initiatives), review the progress of the IPC ROW Project Team, and adjust the 5-year Work Plan as appropriate.

The Parties will meet on a regularly scheduled basis, as determined by the IPC ROW Project Team, and on an ad hoc basis as needed, to resolve issues, questions, or concerns as they arise. Communication would begin with the IPC ROW Project Team. If concerns, issues, or questions cannot be resolved at this level, either party may elevate their issue(s) to the appropriate Field, District and/or state level office for assistance, advice or resolution.

The initial points of contact for these meetings are BLM's Deputy State Director for Resource Services, IPC's Terrestrial Environmental Supervisor, and IPC's Transmission Engineering and Maintenance Leader.

Any communications regarding wildfire, will be conducted as laid out in the "Compromise Agreement between Idaho Power Company and The Bureau of Land Management" dated, June 25, 2009 (Appendix A).

V. ROUTINE OPERATION AND MAINTENANCE AND EMERGENCY-PROMPTED ACTIVITIES ON EXISTING IPC ROW GRANTS

Under the 43 CFR 2800 regulations, a ROW grant is the legal instrument used by BLM to authorize the safe and environmentally-sound construction, operation, maintenance and termination of privately held facilities on public land. To date, the BLM has authorized hundreds of ROW grants to IPC. Although some of these grants have specific stipulations pertaining to maintenance, many of them contain the standard grant form language; simply stating the "operations and maintenance" of granted facilities is authorized.

This section clarifies routine O&M activities for those grants that do not specifically address maintenance activities, clarifies parameters for emergency-prompted activities, clarifies substantial deviations requiring amendments, and lists terms for sensitive and listed species, avian species, cultural resources and survey corner monuments associated with IPCs ROW grants on public land in Idaho, in order to provide consistency in definition and interpretation between the Parties.

IPC is responsible for compliance with all of its BLM ROW grant terms, conditions, stipulations and this agreement. Thus, if a grant stipulates greater restrictions than what is defined as routine O&M in the MA, IPC must follow the more restrictive stipulations for the facility authorized under that grant.

BLM and IPC acknowledge that routine O&M must occur to keep the power lines and power facilities operational, safe, and in good repair. The principles regarding routine O&M and the defined routine O&M activities are listed in Sections V.A.1 and V.A.2, respectively.

BLM and IPC acknowledge that immediate action must be taken in emergency situations. Parameters for the emergency activities prompted by the need for an emergency repair or prompted by wildfire are listed in Section V.B.1 and V.B.2, respectively.

Whether the activity is routine O&M or emergency-prompted, specific stipulations pertaining to sensitive and listed species, avian species, cultural resources and survey corner monuments are laid out in this agreement in sections V.C, V.D., V.E., and V.F., respectively.

A. Routine O&M Activities

1. The Parties agree to the following principles regarding routine O&M:

   a. The routine O&M activities referred to herein apply to all existing IPC ROW grants on public land in Idaho, particularly where the grant is silent or vague regarding O&M activities. Where a specific ROW grant includes more restrictive O&M provisions, the more restrictive provision will apply.

   b. The routine O&M activities referred to herein must be consistent with the applicable Management Framework Plan or Resource Management Plan and Travel Management Plan (Plans). The upcoming yearly operation and

maintenance schedule for Idaho will be checked for consistency with Plans for purposes of verifying compliance.

c. Notification of scheduled routine O&M activities by IPC, to the IPC ROW Team Manager is recommended, as the Land Use Plan restrictions may depend on weather conditions that could change year to year, or a restriction may be in place that could not be anticipated with the check of the yearly upcoming O&M schedule. In addition, the IPC Team Manager may have to answer questions about activities from the public; and BLM could document these routine O&M activities in ROW records. However unless consultation is required by a specific term in a grant or by this MA, IPC may perform routine O&M activities within the ROW boundaries without consulting/notifying BLM.

d. The defined routine O&M activities may occur on a regular or infrequent basis; may be completed in one day or span multiple days; and may damage vegetation and soil within previously disturbed areas (i.e. roads, trails, maintenance routes, structure pads) within the ROW boundary.

e. While accessing sites to conduct routine O&M, IPC will travel on established access and service roads, two-track or off-highway vehicle trails and maintenance routes while using an off-highway vehicle (OHV) or a pick-up truck. If the site cannot be accessed by these means, crews will walk to the site.

f. IPC should avoid travel on roads, trails, and maintenance routes that would create ruts greater than 3 inches in depth. Because of constrained outage windows, some maintenance activities will necessarily occur where ruts will be greater than 3 inches in depth. If the creation of ruts greater than 3 inches is unavoidable, IPC will 1) notify the IPC ROW Team Manager, so that the authorized officer can begin to determine remedial actions; 2) flag avoidance areas within the previously disturbed road, trail or maintenance route surface to minimize or avoid resource damage; and 3) upon completion of the maintenance project, and when the conditions are appropriate for remedial work, IPC will re-grade the road, trail or maintenance route to a condition comparable to the condition prior to disturbance, or as required by the authorized officer.

g. During all vegetation clearing activities, IPC must ensure it does not degrade the soil surface to the level where there would be an added risk of erosion, increase in the establishment or expansion of invasive species (including noxious weeds), damage to cultural resources, sensitive species, or ESA listed species

h. To reduce the spread of noxious weeds to new locations, the vehicle undercarriages will be washed between field visits to new locations. If a crew is continuously working in the same area, they do not need to wash the under-carriage of the vehicles every day.

i. If new circumstances arise that could require formal consultation (i.e., Endangered Species Act (ESA) listing, designated critical habitat, a discovery of an archaeological site or traditionally known property) the need for resource inventories, or avoidance or mitigation measures will be addressed on a case by case basis.

j. If any planned activity is expected to fall outside of the O&M activities defined in Section V.A.2., or any time work or travel occurs outside previously disturbed areas and/or outside the ROW boundary, IPC must obtain approval prior to the start of the activity. IPC will notify the IPC ROW Project Team Manager at least 60 days prior to the planned activity. Upon review, the authorized officer may conclude the proposed activity is a substantial deviation (see glossary). Substantial deviations require an amendment or modification.

k. If any unplanned activity (except for wildfire, see terms regarding wildfire in section V.B.2.) falls outside of the defined O&M activities below, or results in disturbance outside a previously disturbed area and/or the existing ROW boundary, IPC will notify the IPC ROW Team Manager and the appropriate BLM field office within 3 working days of the occurrence. Such unplanned activities may be considered a substantial deviation and require a ROW grant amendment or modification.

2. Unless otherwise specified in an existing ROW grant, the activities presented below are considered routine O&M activities. Subject to specific terms, conditions and stipulations of the ROW grant and reporting requirements contained herein, these activities may be conducted by IPC as necessary:

a. Routine air patrols to inspect for structural and conductor defects, conductor clearance problems, and hazardous trees.

b. Routine ground patrols to inspect structural and conductor components. Patrols may rely on direct line-of-sight and/or binoculars. Patrols are typically conducted in the spring and fall. Follow-up maintenance will be scheduled depending on the severity of the problem, either as soon as possible or as part of routine scheduled maintenance.

c. Climbing structures to inspect hardware or make repairs.

d. Structure or conductor maintenance from a maintenance vehicle. The maintenance vehicle will be located on a road, trail or maintenance route. Maintenance vehicles are stabilized using outriggers so little to no grading of the existing structure pad is necessary to create a safe work area. The need for grading depends on the condition of the existing structure pad.

e. Cathodic protection surveys to check the integrity and function of the anodes and ground beds.

f. Routine vegetation clearing to trim or remove tall shrubs and trees to ensure

adequate ground-to-conductor clearances. Adequate ground-to-conductor clearance shall be at a minimum, in accordance with the North American Electric Reliability (NERC) reliability standard for vegetation, FAC-003-1, National Electric Safety Code Standards, and Occupational Safety and Health Administration (OSHA) standard 1910.269(r). Vegetation clearing cycles vary from 3 to 6 years. The work would be conducted on foot with chainsaws. However, if a mechanical device that does not uproot the vegetation is needed to conduct the clearing, personnel will access the area with the mechanical device attached to a vehicle. While conducting vegetation clearing activities, personnel typically spend less than half a day in an area.

g. Removal of individual trees or snags (hazard trees), inside the ROW boundary, that pose a risk of falling into the power line, conductors or structures and causing outages or fires. The work will be conducted on foot with chainsaws. However, if a mechanical device that does not uproot the vegetation is needed to conduct the clearing, personnel will access the area with the mechanical device attached to a vehicle. While conducting vegetation clearing activities, personnel typically spend less than half a day in an area;

h. Vegetation removal on authorized access and service roads to allow the necessary clearance for access and provide for worker safety. Smaller vegetation (e.g., grasses) that does not hinder vehicle access is left in the road bed. Crews use chainsaws and hand tools to clear the vegetation;

i. In uplands, vegetation six inches or greater in diameter that has been cut during vegetation clearing activities, will not be dropped and left in place, but will be cut into smaller pieces and dispersed within the ROW boundary to avoid concentrated piles or rows of accumulated fuel or will be hauled away; leaving cut vegetation in-place or in piles could present a fire hazard. Dispersement within the ROW boundary can include placement on the edge or down slope of the road bed to be a filtering windrow to minimize erosion and sedimentation. In riparian areas, this cut vegetation should be left on the ground, as long as the location does not interfere with the intended use of the ROW. Note: Burning vegetation is not authorized. If IPC were to determine that the litter volume could warrant burning on site, IPC will contact the appropriate Field Office, in advance of these clearing operations. BLM will work with IPC to select burn sites and provide procedures for piling. Any burning on BLM land will be conducted by and/or authorized by BLM fire personnel at IPC's cost.

j. Reduction of fuel loads around wood poles in fire-prone areas by 1) removal of vegetation within a 20-foot radius and/or treatment with herbicide from the approved BLM list by a certified applicator, and in accordance with the Pesticide Use Permit, or 2) application of fire retardant coating to the base of wood poles. If herbicide is used, IPC will report to BLM the amount used for

BLM's herbicide application yearly report;

k. Treatment of wood pole(s) to retard rotting and structural degradation. Inspect and test the poles (and the surrounding previously disturbed subsurface); and then treat them by injecting preservatives into the pole. Wood pole inspections and treatments normally occur on a 10+ year cycle;

l. Routine inspection and maintenance of authorized service and access roads. Where length and width and alignment of road remains the same, activities include blading the road to maintain the surface condition and drainage, removing minor physical barriers (i.e. rocks and debris), replacing culverts, rock crossings, or other erosion control structures, and rehabilitating after major disturbances requiring heavy equipment (such as slumping). Rehabilitation of major disturbances may include seeding, noxious weed control and erosion control as appropriate. Heavy equipment will travel and maneuver on existing service and access roads. Replacement of culverts greater than 24 inches on intermittent streams or greater than 18 inches on perennial streams will require BLM approval;

m. Installation of bird protection devices, bird perch discouragers, and relocation or removal of bird nests. Under the authority of the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act or Idaho Code, the appropriate permits shall be acquired from U.S. Fish and Wildlife and/or Idaho Department of Fish and Game, prior to relocation or removal of nests. As a courtesy, IPC will provide the IPC ROW Team Manager with a copy of the required permit from the FWS, prior to commencing the activity;

n. In-kind structure replacement (e.g. a monopole with a monopole, an H-frame with an H- frame or a lattice structure with a lattice structure. The material-type (e.g. wood or steel) does not matter, but height and width remain the same. Maintenance vehicles may be located on or off a road. Trucks are stabilized using outriggers, so little to no grading of an existing structure pad is necessary to create a safe work area. As it is not usually possible for the replacement pole to go into the same hole as the old pole, especially when the replacement has to be done with the line energized, pole replacements are placed adjacent the old hole but still on the existing structure pad.

B. Emergency-Prompted Activities

1. The Parties agree to the following terms regarding emergency repair activities:

a. The requirements of emergency repair activities referred to herein apply to all existing ROW grants on public land; however, any specific terms, conditions, and stipulations of existing ROW grants that are more restrictive than the requirements listed in b. c. and d. below, dictate the requirements for emergency repair activities.

b. When an emergency occurs, emergency-prompted action may occur on public land and may or may not fall within the boundaries of the rights-of-

way.

c. If any emergency repair activity results in disturbance outside a previously disturbed area and/or the existing ROW boundary, IPC will notify the IPC ROW Team Manager and the appropriate BLM field office within 3 days of the occurrence. Upon review, the authorized officer may conclude the emergency repair activity is a substantial deviation. Substantial deviations require an amendment or modification.

d. Travel on roads, trails, maintenance routes etc. during emergency repair-prompted activities that would create ruts greater than 3 inches in depth should be avoided. If the creation of ruts greater than 3 inches in depth has occurred, IPC will regrade the road, trail or maintenance route to a condition no less than the condition prior to disturbance, or as determined by the authorized office.

2. In order to protect natural resources, IPC must act reasonably under the circumstances to prevent wildfires that occur as a result of IPC activities or facilities. The Parties agree to the following terms concerning wildfire:

a. When performing routine O&M or emergency repair activities, IPC will 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.

b. IPC personnel will carry firefighting equipment when performing routine O&M or emergency repair activities during the "closed" fire season. The closed fire season is May 10 – October 20 of each year, as set by Idaho State Law, Title 38-115 (see Appendix C), or during any other closed fire season prescribed by the BLM Idaho State Director. IPC personnel will have the following firefighting equipment in their possession: a variety of fire suppression hand tools (i.e. shovels, rakes, pulaskis etc.), a 16-20 pound fire extinguisher, and 20-50 gallons of water with a mechanism to effectively spray the water (i.e. backpack pumps, water sprayer, etc.). IPC personnel will be trained to use the above 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. During BLM's Stage II Fire Restrictions, IPC will obtain an appropriate waiver and take appropriate precautions when conducting routine O&M 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 Fire Prevention Watch Person who will remain in the area for one 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 three feet in diameter that is barren or cleared of all flammable materials. BLM will

inform IPC staff listed on the IPC Notification list (Appendix D), when BLM's Stage II Fire Restrictions are implemented.

d. If a wildfire should occur as a result of IPC activities or facilities, IPC agrees, as identified in the Compromise Agreement, that it will collaborate and cooperate with the BLM's efforts to investigate, suppress and respond to the wildfire.

C. The Parties agree to the following terms concerning special status species:

1. IPC and BLM will share data on special status species to increase awareness of location and conditions of these species.

2. When activities are proposed within an existing ROW grant and under existing authorized uses, and in an area of suspected or known special status species habitat and or species presence, IPC will conduct a records search of IPC records, and IDFG Natural Heritage Program records, to determine the species and/or habitat that could be potentially affected. When habitat or a species is present, measures will be taken to minimize impacts including: following seasonal/timing restrictions, monitoring by an IPC biologist and or botanist, flagging, staking and /or fencing. As a courtesy, IPC biological/botanical staff will advise the IPC ROW Team Manager of the record search results and of measures to be taken to avoid impacts to the species or its habitat.

3. To the extent practical, IPC is responsible to minimize the impact to Idaho BLM sensitive species (including candidate species) and/or federally listed species and designated critical habitat on authorized ROW, regardless of when the ROW was granted.

4. Follow Standard slickspot peppergrass (*Lepidium papilliferum* (LEPA)) Conservation Measures. These measures only apply in Ada, Canyon, Gem, Elmore, Payette, and Owyhee Counties.

a. Minimize driving in slickspots. See Appendix H for the LEPA coverage map.
b. Do not store materials in slickspots
c. No digging in slickspots
d. Avoid routine O&M activities that may disturb soil surface on slickspots when soils are saturated.
e. When soils are saturated in a slickspot and maintenance needs to be completed to avoid what could easily become an emergency situation and this activity may disturb soil surface on slickspots, IPC will consult with BLM on a case by case basis before the work is initiated.
f. Be aware of and minimize soil disturbance in the half-mile buffer areas around element occurrences of slickspots.

5. If an adverse impact has occurred to a BLM sensitive or federally listed species or designated critical habitat (per the USFWS) while performing routine O & M activities or emergency-prompted activities, IPC must notify the IPC ROW Team Manager and appropriate local BLM office within 2 weeks. For BLM sensitive species, the BLM will determine the appropriate mitigation. If a federally listed species is adversely impacted, the BLM, through consultation with the USFWS or National Marine Fisheries Service (depending on the species), will determine the appropriate mitigation consistent with the Endangered Species Act, as amended. IPC should also contact USFWS directly.

D. The Parties agree to the following terms concerning conservation of avian species:

1. For purposes of compliance with the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act, IPC will adhere to its Avian Protection Plan, dated March 2011 and updates thereof (Appendix E) that provides protocols for minimizing electrocution and collision events and managing nests, including protection of nests during vegetation management activities.

E. The Parties agree to the following terms regarding cultural resources:

1. IPC is responsible for avoiding any new impacts to cultural resources (including historic, prehistoric, and paleontological sites), regardless of when the ROW was granted.
2. When ground disturbing activities are proposed within an existing ROW grant and under existing authorizations, IPC will conduct a records search of IPC records and, if needed, SHPO records, to determine if known cultural resources/sites occur within the project area. When sites are present, measures will be taken to avoid impacts to cultural properties within the project area. Measures could include monitoring by an IPC archaeologist, flagging, staking and/or fencing to insure maintenance work occurs within previous impact areas and to avoid new impacts, or working from existing access routes and structure pads. As a courtesy, IPC cultural staff will advise the IPC ROW Team Manager of measures to be taken to avoid impacts to known sites.
3. When ground disturbing activities deviate from existing ROW authorizations and stipulations or are considered a substantial deviation, as defined in V.A.1.j and k; and V.B.1 c., or may be considered an undertaking pursuant to 36 CFR §800.16(y), IPC archeologists will contact the BLM field office archeologist to coordinate and determine the level of evaluation required. BLM will determine whether the proposed activity can be classified as an exempt undertaking, requiring no further work pursuant to Appendix C of the State Protocol Agreement of 1998 between Idaho BLM and the SHPO (Appendix F). If the proposed activity is a non-exempt undertaking under the Idaho BLM and SHPO Protocol Agreement, IPC will require a professional

archaeologist to apply for a BLM Cultural Resources Use Permit or Field Work Authorization to conduct a cultural resources inventory of the project area, pursuant to 36 CFR §800 and BLM Manual 8110, prior to project approval.

4. If a cultural resource is discovered or has been affected during the performance of planned routine O&M activities, IPC will immediately *cease operations* and take all reasonable measures to protect the site and notify the appropriate BLM office. It is understood that IPC would not cease emergency activities if life or property is at risk, but if a cultural resource is discovered or has been affected, will notify the appropriate BLM office immediately post-emergency activity. The BLM will determine the appropriate protection/mitigation measures through consultation with the Idaho SHPO; following standard timelines as laid out in the applicable 36 CFR 800. BLM is cognizant of constrained outage windows; the BLM will work toward a determination in as timely a manner as possible. IPC can either agree to the required mitigation or BLM will issue an appealable decision that defines IPC's mitigation responsibilities.

F. The Parties agree to the following terms regarding survey corner monuments:

1. Survey corner monuments and ROW boundary markers must be preserved.
2. If a monument or marker is destroyed during routine O&M, IPC will notify the appropriate Field Office.
3. All property and Public Land Survey System corner monuments, accessories, and boundary markers affected by ROW and facility construction will be protected and/or restored according to Idaho State Law, Section 55-1613, "Corner Perpetuation and Filing," (Appendix G) under the auspices of a licensed land surveyor, prior to construction activities that may disturb those monuments. Disturbing land boundary monuments is a violation of 18 U.S.C 1858.

VI. ROUTINE OPERATIONS AND MAINTENANCE and EMERGENCY-PROMPTED ACTIVITIES ON FUTURE IPC ROWs and/or ROW AMENDMENTS AND RENEWAL ACTIONS:

A. For future ROW grants, amendments, and renewals, both Parties agree to use the principles, activity descriptions and terms in Section V. as a starting point to describe activities in the ROW application.

B. All ROW applications for new grants, amendments or renewals of existing grants will be processed in accordance with 43 CFR 2800 et al, and applicable laws.

VII. IPC ROW PROJECT TEAM

The IPC ROW Project Team will be established to address outstanding IPC ROW trespass and process IPC realty actions for ROWs on public land in Idaho. Having the IPC ROW Project Team in place to address ROW actions state-wide will promote a consistent and streamlined process for the BLM and IPC regarding the IPC ROW issues covered by this MA.

A. The Parties agree to the following regarding the framework of the IPC ROW Project Team:

1. The IPC ROW Project Team will work through issues pertaining to IPC power lines/power facilities ROWs in Idaho, following the rules and regulations of the BLM.

2. The IPC ROW Project Team will consist of one BLM employee (the Team Manager), IPC staff and IPC contracted staff.

3. The Team Manager will be stationed in the BLM Idaho State Office. The Team Manager will be supervised by the BLM Idaho State Office Branch Chief of Lands, Mineral and Water Rights.

4. IPC staff and IPC contracted staff will be stationed wherever IPC determines appropriate; while IPC staff and IPC-contracted staff will remain to be supervised by IPC.

5. The IPC ROW Project Team may work simultaneously on projects throughout the state. Periodic travel to field locations is expected to occur.

6. The IPC ROW Team Manager will be a realty specialist processing IPC realty actions state-wide; thus removing the IPC realty processing workload from the Field Office realty specialists.

7. The IPC staff and IPC-contracted staff on the IPC ROW Project Team will provide surveys, information, or draft documents at the request of the IPC ROW Team Manager while working on IPC ROW Project Team projects.

8. The IPC ROW Project Team will be formed following the implementation of this MA.

9. The IPC ROW Team Manager will request additional BLM employees to work on MA-related activities at specific phases for review and final approval of surveys and National Environmental Policy Act (NEPA) documents, etc. Additional BLM employees may be requested to help with certain aspects of the administrative process. The additional BLM employees may consist of District or Field Office Managers, NEPA specialists, Realty Specialists, Land Law Examiners, Land Surveyors, administrative staff and fire and resource staff.

10. Decisions relating to NEPA and ROW grants will be made by the Delegated Authorized Officer[1].

11. The IPC ROW Project Team will consult with the Idaho State Office Realty staff regarding processing questions, policy considerations and implementation of the MA, as needed.

B. The Parties agree to the following regarding the general responsibilities of the IPC ROW Project Team:

1. The IPC ROW Project Team has been formed to work on these MA-related activities. It is intended for the Team Manager to focus solely on these MA-related activities. IPC team members will work on other projects concurrently.

2. The responsibilities of the IPC ROW Project team can be categorized into three categories: 1)processing ROW actions for new authorizations, renewals, amendments, modifications, assignments, relinquishments, terminations; 2) assisting to solve operation and maintenance issues; and 3) the resolution of power line and power facility trespass.

3. All ROW actions will be processed per 43 CFR 2800, et al. and other applicable laws.

4. The IPC ROW Project Team will have input to the 5-year Work Plan described in Section IV, but the ultimate decision will lie with BLM's Deputy State Director for Resource Services, IPC's Terrestrial Environmental Supervisor, and IPC's Transmission Engineering and Maintenance Leader, or their designees.

5. The IPC ROW Project Team will be committed to working the priorities set for the current year as defined in the 5-year Work Plan. Until the Work Plan has been finalized, it is currently anticipated time spent on the MA-related workload will be allocated as follows:

a. 50% on numerous ROW projects, such as new grants, renewals, and amendments/modifications and fielding routine O&M issues that may be occurring throughout the state. BLM and IPC will determine the priority of the projects;

b. Until resolved, 25% inventorying the access roads that require authorization.

c. Until resolved, 25% to support resolution of IPC trespass state-wide.

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[1] The delegated authorized officer is the Field Manager whose boundary contains the project or trespass facility. As not all utility lines will fall entirely within a single BLM Field Office boundary, the Manager of the Field Office containing the largest amount of the line will normally become the authorized officer, unless basis is otherwise determined by BLM.

VIII. ACCESS ROAD INVENTORY AND AUTHORIZATION

The IPC ROW Project Team will be inventorying for access roads that require authorization. Not all roads on public lands, used by IPC to access their service roads and power lines, are authorized under a ROW; these access roads should be authorized by a ROW to IPC. The Parties agree to the following regarding inventorying the access roads:

A. It is in both Parties' interest to identify, categorize and map roads on public lands used by IPC to access their service roads and power lines, as efficiently as possible;

B. The access roads to be included under IPC ROWs will require accurate location which may require GPS or survey data;

C. The Parties agree to share GIS data to assist with inventory and authorization effort.

D. Identification of a route used by IPC does not guarantee that the BLM will approve the route in the exact location/alignment. The Parties will strive to agree on a mutually acceptable route.

E. The authorization of access roads will be processed as an amendment to existing ROW(s) and/or included into the authorizations of new ROWs and per regulations 43 CFR Subpart 2800.

F. Prioritization of grants needing to be amended to include access roads will consider grants that are being renewed, power lines under particular industry-regulated requirements (i.e., NERC Standard FAC-501-WECC - regulated lines), roads in designated critical habitat, roads considered or being considered by a BLM Travel Management Plan, and roads that have future maintenance needs. It is understood that the authorized access roads will be considered ancillary facilities to the power line ROW, and not included in the rent calculations. As usual, the power line and service roads are included in the rental calculation for the ROW.

IX. TRESPASS RESOLUTION

The IPC ROW Project Team will be resolving trespass of power lines/power facilities/ancillary facilities to power lines and power facilities. Fire trespass will not be handled by the IPC ROW Project Team, but rather will be handled by the State Fire Management Officer or designee (i.e. Fire Trespass Coordinator). The Parties agree to the following regarding power line/power facility/ancillary facility trespass:

A. It is in both Parties' interest to identify and resolve any outstanding IPC trespass of power lines/power facilities/ancillary facilities on public lands state-wide, as expeditiously as possible;

B. IPC and BLM will ensure the accuracy of their power line/power facility/and

ancillary facility records and compare the records to identify any undocumented power lines/power facilities/and ancillary facilities;

C. Trespass power lines and ancillary facilities will be captured in GIS and the IPC ROW Project Team will begin to work on resolution.

D. The resolution of the trespass cases will be processed as described in 43 CFR Subpart 2808 (which many include resource inventories while considering the effects of the trespass), except for the determination of non-willful intent addressed in VIII.E of this agreement.

E. Because of IPC's cooperation with BLM regarding trespass disclosure, BLM will consider the confirmed trespasses, identified through the records comparison, as non-willful and forego the additional penalty charges laid out in 43 CFR 2808.10 and 2808.11(b)(1);

F. Past rent payment for all years of unauthorized use and development, will be due to the BLM from IPC. Payment will be separate from the 5103 account established by this MA which covers administrative costs only (see Section X for information on the 5103 account);

G. Payment for BLM's administrative costs, incurred due to investigation and resolution of trespass will be paid by IPC through the 5103 project account set-up through this MA;

H. Unless there are factors that prove negligence in IPCs attempt to satisfy the power line/power facility/ancillary facility trespass liability, other IPC ROW actions will continue to be processed;

I. If IPC applies for a ROW for the trespass power line/power facility/ancillary facility and the BLM grants the ROW, accurate location of the ROW must be known, which will require GPS or survey data;

G. Both Parties understand and agree that once all outstanding trespasses are identified through the records comparison, as specified in this MA and settled according to this MA, with the non-willful determination, this section regarding trespass (Section VIII.), will be satisfied and cease to have effect; any new trespass will be addressed on an individual basis in accordance with the CFR and other applicable laws.

X. COST REIMBURSEMENT

The BLM will establish a project code under the sub-activity 5103 within its financial system for this MA. Subproject codes will be established for the processing, monitoring and compliance for each distinct type of ROW action; for example trespass work, new ROW grants, ROW amendments, etc. Each application will have its own subproject code. The Parties agree to the following:

A. IPC agrees to pay BLM for all actual costs incurred by the BLM (Idaho) in executing the terms and work actions covered by this MA and subsequent 5-year Work Plan.

Since IPC agrees to pay all actual costs, BLM will not provide IPC with separate Cost Recovery Category decisions for each individual case action.

B. IPC also agrees to provide funding for the following employees:

1. Fully-funded IPC ROW Team Manager (full time employee);
2. One work-month each year for the BLM Idaho State Office Realty Specialist who will provide guidance when necessary and oversee the MA to ensure consistency with MA-related activities;
3. Any time spent by any additional BLM employees and Office of the Solicitor employees requested to work on MA-related activities by the IPC ROW Project Team.

XI. DEPOSIT, BILLING, PAYMENT AND AUDITING

The IPC ROW Team Manager will be a fully funded position. An Idaho State Office Realty Specialist would be funded for one work-month per year. The number of hours spent per year by the additional BLM employees will depend on the complexity and number of ROW actions. BLM will estimate the cost for additional employees each year; however IPC will pay BLM for all the time spent by additional BLM employees, even if the costs exceed the estimated amount. The yearly estimate to cover BLM costs is outlined in Appendix I and will be revised each year to reflect salary changes and changes to expected workload.

The BLM will maintain an account ledger to track financial data for each 5103 project account; this will identify initial deposit, subsequent deposits and line item expenditures. Hours incurred by BLM employees while working on MA-related activities will be tracked utilizing BLM Form 1323-1 Reimbursement Project Log. BLM will provide IPC with a copy of the ledger and Project Logs for inspection and verification quarterly. IPC may request financial data at other times, as required. When the account balance drops below $25,000, IPC will be asked to contribute additional funds to the account.

XII. GENERAL PROVISIONS

By executing this MA, neither the BLM nor IPC waive any rights they may otherwise have. Both Parties agree to periodically review the MA and update it as needed. The MA will be reviewed after the first year and shall be reviewed annually thereafter.

The designated points of contact for all aspects of this MA are the following:

BLM Idaho

Deputy State Director for Resource Services
BLM Idaho State Office
Bureau of Land Management
1387 S. Vinnell Way
Boise, ID 83709

Presently: Jeff Foss
Phone: 208-373-3801
Fax: 208-373-3805
e-mail: jfoss@blm.gov

IPC Idaho
Environmental Supervisor, Environmental Affairs
Idaho Power Company
1221 West Idaho Street
Boise, ID 83702
Presently: Brett Dumas
Phone: 208-388-2330
Fax: 208-388-5880
e-mail: BDumas@idahopower.com

Transmission Engineering and Maintenance Leader
Idaho Power Company
1221 West Idaho Street
Boise, ID 83702
Presently: Dale Welch
Phone: 208-388-2088
Fax:
e-mail: DWelch@idahopower.com

XIII. TERMINATION

The BLM or IPC may terminate this agreement after a minimum of four years and with 6 months written notice to the other party. In the event of termination of the MA, all ROW management activities shall continue in accordance with the regulations found at 43 CFR 2800 et seq., and other applicable laws and regulations. If the parties agree to terminate this agreement, the 5-year Work Plan will also terminate and any pending work tasks will be sent back to the field office for processing.

Prior to termination, IPC must pay in full; any outstanding balance due for work performed under this MA, and conversely, will be reimbursed for any unused portion for work that has not been completed.

XIV. EFFECTIVE DATE

This MA is effective as of the date of its execution by both BLM and IPC and shall remain in effect until terminated.

Bureau of Land Management:

Steve. A. Ellis, State Director — Date 4/6/2012

Idaho Power Company:

Dan Minor, Executive Vice-President — Date 3/19/2012

XV. Glossary

Adverse impact - To have a detrimental effect on any or all portions of the life cycle of a threatened or endangered species or on its habitat or a component thereof.

Candidate Species – plant and animal taxa considered for possible addition to the list of endangered and threatened species under the Endangered Species Act. These are taxa for which the FWS or NMFS has on file sufficient information on biological vulnerability and threat(s) to support issuance of a proposal to list, but issuance of a proposed rule is presently precluded by higher priority listing actions. Separate lists for plants, vertebrate animals, and invertebrate animals are published periodically in the Federal Register. Candidate species and their habitats are managed as Bureau sensitive species.

Constrained Outage Windows – The time period, as coordinated with the Western Electric Coordinating Council (WECC), when a transmission line can be de-energized to allow for maintenance work. Outage windows are constrained by the ability to route required power on other lines to the same destination and the requirement to meet customer needs. Outage windows are determined by the transmission path, what other outages are scheduled for that path and power needs.

Cultural Resources – A definite location of human activity, occupation, or use identifiable through field inventory (survey), historical documentation, or oral evidence. The term includes archaeological, historic, or architectural sites, structures, or places with important public and scientific uses, and may include definite locations (sites or places) of traditional cultural or religious importance to specified social and/or cultural groups. Cultural resources are concrete, material places and things that are located, classified, ranked, and managed through the system of identifying,

protecting, and utilizing for public benefit. They may be but are not necessarily eligible for the National Register.

Established access/service roads - Service roads are those roads necessary for the construction and future O&M activities of the power line. These roads would not exist if the power line did not exist. Alternatively, access roads are those established roads used to travel to service roads. Access roads serve multiple purposes.

Existing structure pad - The area that was disturbed during previous construction of the power line and includes the hole drilled for the placement of the structure or foundation and disturbed area around the hole that accommodated the crews working on the structure. The pad size varies by structure type.

Federally Listed Species – species that are designated under the ESA as either threatened or endangered, which may include members of the Plant, Animal or Fungi–Lichen Kingdoms.

Idaho BLM Sensitive Species – Species identified in Categories 1-4, that require special management consideration to avoid potential future listing under the ESA and that have been identified in accordance with manual procedures. Category 5 species are watch list species that are not considered Idaho BLM sensitive species but current populations or habitat information suggests that species may warrant sensitive species status in the future; they are not subject to the terms laid out in the MA.

Intermittent Streams – Streams that do not flow water year-round.

National Electric Safety Code Standards – These are basic provisions for safeguarding persons from hazards resulting from installation, operation, and maintenance of conductors and equipment in electric supply stations, overhead and underground electric supply and communication lines.

NERC Standard FAC-003-1 – Electric Reliability Standard FAC-003-1 requires that trees and other vegetation growing in or adjacent to the power line right-of-way be trimmed to prevent power outages caused by tree contact with a transmission line. Trees and other vegetation are regularly pruned beyond the minimum clearance distance to account for the fact that they continuously grow and sway with the wind. Power lines can also sag due to high usage, heat, or snow/ice build-up. Thus prudent right-of-way maintenance necessitates a greater clearance distance between power lines and trees than may occasionally appear to be necessary. Each utility develops and implements its own tree trimming or vegetation management plan. Each plan must conform to requirements of state or local authorities and any applicable right-of-way or easement agreement with the property owner. High voltage transmission lines operated above 200,000 volts (200 kV) and some transmission lines between 100 kV-200 kV are subject to Reliability Standard FAC-003-1.

NERC Standard FAC-501-WECC – Transmission lines in the bulk electric system within major Western Electric Coordinating Commission transfer pathways requiring a "Transmission Maintenance and Inspection Plan." These lines, and those subject to NERC Standard FAC-003-01, are commonly referred to as "NERC lines".

OHV – Off-Highway Vehicles include utility-terrain vehicles (UTV) and motorcycles. UTVs are all-terrain utility vehicles (e.g., Kubota or Polaris Ranger), snow mobiles, snow cats, etc.

OSHA Standard 1910.269(r) - The standard 1910.269(r) addresses both personnel and equipment requirements. The line-clearance tree trimming equipment requirements in 1910.269(r)(2) through (8) apply to 1910.269 qualified employees and line-clearance tree trimmers who are clearing lines with brush clippers, sprayers, stump cutters, chain saws, backpack power cutters, climbing ropes, or safety saddles.

Perennial Streams – Streams that flow water throughout the year.

Riparian areas – Areas within 100 feet of streams identified on the USGS National Hydrography Dataset stream layer (http://nhd.usgs.gov/data.html).

Special Status Species - collectively, federally listed or proposed and Bureau sensitive species, which include both Federal candidate species and delisted species within 5 years of delisting.

Substantial deviation - Substantial deviations include any activity that would change the authorized location or use which requires construction and/or use outside the boundaries of the ROW area; or any change from, or modification of, the authorized use. Substantial deviations require approval from the BLM in the form of a grant amendment or modification prior to the start of planned work. Substantial deviations as a result of emergency-prompted activities will be handled post-activity and will require approval from BLM in the form of a grant amendment or modification. Grant amendments / modifications trigger NEPA which may require additional environmental studies and/or analysis under Section 106 of the National Historic Preservation Act (NHPA), the Endangered Species Act, and other laws and regulations; which may require additional time to complete. Substantial deviations might include:

- Surface or resource disturbing activities (beyond that of casual use) that occurs outside of the ROW or authorized roads.
- Replacing structures that result in ground disturbing activities outside of a previously used structure pad.
- Out-of-kind replacement of structures or other facilities.
- Construction of a new road or facility where one has not previously existed.
- Installation of equipment on power poles not related to IPC's business needs, such as telephone cable, fiber optic lines for other companies, etc.
- Change in voltage of a power line that was not specified within the ROW grant.
- Improvements to existing road or facilities which change the original character or footprint, such as upgrading from dirt to gravel surface, or increasing the size of a building