

## EXHIBIT J ENVIRONMENTAL IMPACT SUMMARY

### OAR 345-020-011(1)(j)

Identification of significant potential environmental impacts of construction and operation of the proposed facility on the study areas, including those impacts affecting air quality, surface and ground water quality and availability, wildlife and wildlife habitat, threatened and endangered plant and animal species, historic, cultural and archaeological resources, scenic and aesthetic areas, recreation and land use.

### J1. Impact Summary by Resource

The following discussions apply to the Proposed Corridor and reasonable alternative corridors.

#### Air Quality

During construction, operation of gasoline and diesel fuel engines in land-clearing/grading equipment, cranes, bulldozers, and various types of trucks and cars could result in minor air quality impacts in the vicinity of project. Dust can be created directly from the activities involved in construction, such as vegetation removal, grading, and vehicles and equipment moving on unsurfaced roads. Impacts from vehicle operation and fugitive dust will be controlled by applying the appropriate control measures (e.g., watering unpaved roads, covering piles, etc). The Project will emit no pollutants during operation and does not require permits from the ODEQ or Idaho Department of Environmental Quality (IDEQ). Maintenance activities will be infrequent, particularly in the early years of operation. Where maintenance is required, there would be operation of gasoline and diesel fuel engines in cranes, personnel hoists, or various types of trucks and cars. There could be a very minor amount of dust generated. As is the case for operations, the level of emissions during maintenance would be well below any need for permits

Surface and Groundwater Quality: Construction storm water will be managed as required by NPDES 1200-C permit issued by ODEQ and by EPA in Idaho. Transmission lines and associated substations will not discharge pollutants to surface water or groundwater during maintenance and operation. Potential affects to surface water quality from construction and use of road crossings will be addressed in the Storm Water Pollution Prevention Plan and through project-specific best management practices.

#### Surface and Groundwater Availability

Major water uses are for preparation and installation of concrete transmission line structure and substation equipment foundations, and dust control during ROW, staging, fly yard, access road, and substation grading and site work. As the preliminary design is refined, the total amount of water needed will be identified. The required water will be procured from municipal sources and/or from landowners. No new water rights will be required but if needed, limited licenses will be procured from the Oregon Water Resources Department (WRD) and Idaho Department of Water Resources (IDWR). During maintenance and operation, the Project will not require any new use of surface or groundwater.

#### Wildlife and Wildlife Habitat

The Proposed Corridor will cross 71.9 miles of elk winter range, 121.9 miles of deer winter range, and 3.5 miles of Big Horn Sheep habitat. Wildlife could be affected primarily during the construction phases but may also be affected during maintenance activities. Idaho Power utilizes construction techniques and BMPs that avoid, minimize, and mitigate potential wildlife impacts.

**Terrestrial Habitat** – Wildlife and habitat impacts potentially resulting from constructing the proposed project and associated facilities (e.g., access roads and substations) are related to habitat disturbance, introduction of invasive species, injury or mortality, erosion, dust, noise, contaminant exposure, and

interference with behavior. Potential impacts resulting from operation and maintenance include electrocution and exposure to electromagnetic fields, noise, collisions, maintenance activities (including herbicide use), contaminants (including oil spills), disturbance (including habitat disturbance and interference with animal behavior), and fire effects (e.g., an indirect effect of the project could be an increase in the potential for fires). Specific mitigation measures will be developed to avoid or minimize potential impacts to wildlife species from the Project.

**Riparian and Aquatic Habitat** – Potential impacts could include changes in water surface flow patterns, deposition of sediment in surface water bodies, changes in water quality or temperature regimes, loss of riparian vegetation, introduction of toxic materials, and changes in human access to water bodies. During maintenance of the ROW, aquatic systems could be adversely affected by maintenance activities, including vegetation management.

## **Threatened and Endangered Plant and Animal Species**

There are 16 federal wildlife, fish, and plant threatened, endangered, or candidate species and a variety of special status species that may occur in the vicinity of the Proposed Corridor. These species are listed in Tables J-1 and J-2. Siting of the proposed ROW avoids, to the extent practicable, known critical habitat. Potential habitat and the location of threatened, endangered, and special status species will be identified through site-specific field surveys. Micrositing and adoption of BMPs will avoid or reduce the potential for significant impacts.

## **Historic, Cultural, and Archaeological Resources**

Human use of the project area extends over 12,000 years. Of special interest in the project area are the National Historic Trails, including the Oregon National Historic Trail. The Proposed Corridor would be within a 1,200-foot buffer of historic trails for 6.4 miles and cross 0.5 mile of intact trail buffer. For trails, both the physical integrity and the integrity of the setting are important. A survey of historic, cultural, and archaeological resources will be conducted in accordance with a Programmatic Agreement agreed to among the responsible agencies, Applicant, and others prior to construction. Based on the results of these surveys the Project could be realigned or mitigation proposed to reduce impact.

## **Scenic and Aesthetic Areas**

The Project would cross some mountainous areas and extensive rangeland with panoramic views. The Project would also cross areas managed for scenic qualities including 3.6 miles of BLM Visual Resource Management (VRM) Class II, 1.6 miles of USFS Retention, and 4.6 miles of Partial Retention. The transmission line has the potential to impact visual resources. The ongoing siting and routing for this Project have included efforts to minimize impact on scenic and aesthetic resources.

## **Recreation**

The transmission line routes will avoid protected areas including recreational resources. Potential visual effects on recreational resources have been considered in the identification of routes and will be described in the ASC.

## **Land Use**

Approximately 200 miles of the 300-mile route is proposed to be on private land with the balance mostly on BLM managed lands. The Project would follow 32.8 miles of designated utility corridor which partially overlaps 101 miles of existing transmission line that is paralleled. The predominant land covers crossed by the Proposed Corridor are agriculture and forest. Of these, 18 miles is cropland/irrigated farmland. The Proposed Corridor crosses 162.3 miles of Exclusive Farm Use Zone/Multiple Use Range

Zone which could not be avoided. Micrositing during the design phase will further minimize impacts to these land uses.

## **J2. Phased Study Approach**

Idaho Power proposes to collect necessary data to support the analysis of resource impacts in phases. This data collection approach will provide an appropriate level of detail for decision making while allowing the EFSC Site Certificate, NEPA, BLM ROW Grant, and USFS Special Use Permit processes to proceed concurrently. The specific phasing of data described below takes into account the unique nature of a long high voltage transmission line, multiple regulatory processes, public interest and input in line routes, and the inherent ability of transmission line components to be microsited in many cases to minimize or avoid impact. When the three phases are taken together, the data collected and analyzed will meet NEPA requirements, typical BLM and USFS survey requirements, and the substantive requirements of EFSC regulations.

The phases of the study plan are as follows:

- **Phase 1**, largely based on collection and utilization of existing data, would provide the basis for ODOE to deem the ASC complete and issue the Draft Proposed Order, and for the BLM to issue a Draft Environmental Impact Statement (EIS).
- **Phase 2** would provide protocol level information about Idaho Power's Proposed Corridor as described in the ASC and allow the BLM to issue a Final EIS; and
- **Phase 3** would provide site-specific data for resources along the approved route that could be affected at the time of construction as well as information on conditions that have changed due to route or project description changes.

Appendix J-1 describes how data collection would be accomplished during each phase.

**Table J-1.** Special Status Fish and Wildlife Species with the Potential to Occur in the Vicinity of the Project

Species	USFWS <sup>1/</sup>	BLM Boise District <sup>2/</sup>	BLM Oregon District <sup>2/</sup>	USFS R6 <sup>3/</sup>	ODFW <sup>4/</sup>	Potential Habitat within Route	Potential Field Survey Requirement
<b>MAMMALS</b>							
Gray Wolf ( <i>Canis lupus</i> )	E  Delisted 4/2/2009 in Idaho and Eastern Oregon	FRFO	VALE (E in OR)	UMA(E); WAW(E)	LE	Y	N
Canada Lynx ( <i>Lynx canadensis</i> )	T	FRFO;	VALE; PRIN	UMA; WAW (MIS)		N	N
Washington ground squirrel ( <i>Spermophilus washingtoni</i> )	C		VALE; PRIN		LE	Y	Y
Pygmy Rabbit ( <i>Brachylagus idahoensis</i> )		FRFO	VALE; PRIN		SV	Y	Y
White-tailed Jack Rabbit ( <i>Lepus townsendii</i> )					SU	Y	N
Wolverine ( <i>Gulo gulo</i> )		FRFO (North American sub- species)	PRIN	UMA; WAW (MIS) (California subsp)	LT	Y	N
Fisher ( <i>Martes pennanti</i> )		FRFO	PRIN	WAW	SC	Y	N
American Marten ( <i>Martes martes</i> )				UMA (MIS); WAW (MIS)	SV	Y	N
Kit Fox ( <i>Vulpes velox</i> )			VALE			N	N
Rocky Mountain Elk ( <i>Cervus canadensis</i> )				WAW (MIS)		Y	N
Fringed Myotis ( <i>Myotis thysanodes</i> )		FRFO	VALE; PRIN		SV	Y	N
Spotted Bat ( <i>Euderma aculatum</i> )		FRFO	VALE; PRIN		SC	Y	N
Townsend's Big-eared Bat ( <i>Corynorhinus townsendii</i> )		FRFO	VALE; PRIN	UMA	SC	Y	N

**Table J-1. Special Status Fish and Wildlife Species with the Potential to Occur in the Vicinity of the Project (continued)**

Species	USFWS <sup>1/</sup>	BLM Boise District <sup>2/</sup>	BLM Oregon District <sup>2/</sup>	USFS R6 <sup>3/</sup>	ODFW <sup>4/</sup>	Potential Habitat within Route	Potential Field Survey Requirement
Pallid Bat ( <i>Antrozous pallidus</i> )			PRIN		SV	Y	N
<b>AVIAN</b>							
Bald Eagle ( <i>Haliaeetus leucocephalus</i> )	Delisted 8/8/2007	FRFO	VALE; PRIN	UMA; WAW (MIS)	LT	Y	N
Yellow-billed Cuckoo ( <i>Coccyzus americanus</i> )	C	FRFO	VALE; PRIN		SC	N	N
Flammulated Owl ( <i>Otus flammeoulus</i> )		FRFO			SC	Y	N
Great Gray Owl ( <i>Strix nebulosa</i> )					SV	Y	N
Burrowing Owl ( <i>Athene cunicularia</i> )					SC	Y	Y
Greater Sage-grouse ( <i>Centrocercus urophasianus</i> )		FRFO	VALE; PRIN	WAW	SV	Y	Y
Columbian Sharp-tailed Grouse ( <i>Tympanuchus phasianellus columbianus</i> )		FRFO	VALE	WAW		Y	Y
Mountain Quail ( <i>Oreotyx pictus</i> )		FRFO				Y	N
Peregrine Falcon ( <i>Falco peregrinus anatum</i> )		FRFO	VALE; PRIN	UMA; WAW (MIS)	LE	Y	N
Prairie Falcon ( <i>Falco mexicanus</i> )		FRFO				Y	N
Northern Goshawk ( <i>Accipiter gentilis</i> )		FRFO		WAW (MIS)	SC	Y	Y
Ferruginous Hawk ( <i>Buteo regalis</i> )		FRFO			SC	Y	Y
Swainson's hawk ( <i>Buteo swainsoni</i> )					SV	Y	Y
Common nighthawk ( <i>Chordeiles minor</i> )					SC	Y	N

**Table J-1.** Special Status Fish and Wildlife Species with the Potential to Occur in the Vicinity of the Project (continued)

Species	USFWS <sup>1/</sup>	BLM Boise District <sup>2/</sup>	BLM Oregon District <sup>2/</sup>	USFS R6 <sup>3/</sup>	ODFW <sup>4/</sup>	Potential Habitat within Route	Potential Field Survey Requirement
Three-toed Woodpecker <i>(Picoides tridactylus)</i>				UMA; WAW (MIS)	SC	Y	Y
Lewis' Woodpecker <i>(Melanerpes lewis)</i>		FRFO	VALE; PRIN	UMA (MIS); WAW (MIS)	SV	Y	N
White-headed Woodpecker <i>(Picoides albolarvatus)</i>		FRFO	VALE; PRIN	UMA (MIS); WAW (MIS)	SC	Y	N
Williamson's Sapsucker <i>(Sphyrapicus throideus)</i>		FRFO		UMA (MIS); WAW (MIS)		Y	N
Pileated Woodpecker <i>(Dryocopus pileatus)</i>				UMA (MIS); WAW (MIS)		Y	N
Yellow-bellied Sapsucker <i>(Sphyrapicus varius)</i>				UMA (MIS); WAW (MIS)		Y	N
Black-backed Woodpecker <i>(Picoides arcticus)</i>				UMA (MIS); WAW (MIS)	SC	Y	N
Hairy Woodpecker <i>(Picoides villosus)</i>				UMA (MIS); WAW (MIS)		Y	N
Northern Flicker <i>(Colaptes auratus)</i>				UMA (MIS); WAW (MIS)		Y	N
Downy Woodpecker <i>(Picoides pubescens)</i>				UMA (MIS); WAW (MIS)		Y	N
Mountain Chickadee <i>(Poecile gambeli)</i>				UMA (MIS); WAW (MIS)		Y	N
Black-capped Chickadee <i>(Poecile atricapilla)</i>				UMA (MIS); WAW (MIS)		Y	N
White-breasted Nuthatch <i>(Sitta carolinensis)</i>				UMA (MIS); WAW (MIS)		Y	N
Red-breasted Nuthatch <i>(Sitta canadensis)</i>				UMA (MIS); WAW (MIS)		Y	N
Pygmy Nuthatch <i>(Sitta pygmaea)</i>				UMA (MIS); WAW (MIS)		Y	N
American White Pelican <i>(Pelecanus erythrorhynchos)</i>		FRFO	VALE; PRIN			N	N

**Table J-1.** Special Status Fish and Wildlife Species with the Potential to Occur in the Vicinity of the Project (continued)

Species	USFWS <sup>1/</sup>	BLM Boise District <sup>2/</sup>	BLM Oregon District <sup>2/</sup>	USFS R6 <sup>3/</sup>	ODFW <sup>4/</sup>	Potential Habitat within Route	Potential Field Survey Requirement
Trumpeter Swan ( <i>Cygnus buccinator</i> )			VALE; PRIN			N	N
Horned Grebe ( <i>Podiceps auritus</i> )			VALE			N	N
Calliope Hummingbird ( <i>Stellula calliope</i> )		FRFO				Y	N
Willow Flycatcher ( <i>Empidonax trailii</i> )		FRFO				Y	N
Hammond's Flycatcher ( <i>Empidonax hammondi</i> )		FRFO				Y	N
Olive-sided Flycatcher ( <i>Contopus borealis</i> )		FRFO			SV	Y	N
Black Swift ( <i>Cypseloides niger</i> )			PRIN			N	N
Loggerhead Shrike ( <i>Lanius ludovicianus</i> )		FRFO			SV	Y	N
Sage Sparrow ( <i>Amphispiza belli</i> )		FRFO			SC	Y	N
Black-throated Sparrow ( <i>Amphispiza bilineata</i> )		FRFO			SP	Y	N
Grasshopper Sparrow ( <i>Ammodramus savannarum</i> )			VALE; PRIN		SV/SP	Y	N
Yellow Breasted Chat ( <i>Icteria virens</i> )						N	N
Bobolink ( <i>Dolichonyx oryzivorus</i> )			VALE; PRIN		SV	N	N
Tricolored blackbird ( <i>Agelaius tricolor</i> )			PRIN		SP	Y	N
Western Bluebird ( <i>Sialia Mexicana</i> )					SV	Y	N
Franklin's Gull ( <i>Larus pipixcan</i> )			VALE			N	N

**Table J-1.** Special Status Fish and Wildlife Species with the Potential to Occur in the Vicinity of the Project (continued)

Species	USFWS <sup>1/</sup>	BLM Boise District <sup>2/</sup>	BLM Oregon District <sup>2/</sup>	USFS R6 <sup>3/</sup>	ODFW <sup>4/</sup>	Potential Habitat within Route	Potential Field Survey Requirement
Upland Sandpiper ( <i>Bartramia longicaula</i> )		FRFO	PRIN	UMA; WAW	SC	Y	N
Long-billed Curlew ( <i>Numenius americanus</i> )					SV	Y	N
Bufflehead ( <i>Bucephala albeola</i> )			PRIN	WAW		N	N
<b>REPTILES AND AMPHIBIANS</b>							
Columbia Spotted Frog ( <i>Rana luteiventris</i> )	C		VALE; PRIN	UMA; WAW		Y	N
Oregon Spotted Frog ( <i>Rana pretiosa</i> )			PRIN		SC	N	N
Northern Leopard Frog ( <i>Rana pipiens</i> )		FRFO	VALE	UMA		Y	N
Western Toad ( <i>Bufo boreas</i> ) Northern Rocky Mountain Population		FRFO			SV	Y	N
Woodhouse Toad ( <i>Bufo woodhousii</i> )		FRFO	VALE		SP	Y	N
Inland Tailed Frog ( <i>Ascaphus montanus</i> )			VALE	UMA; WAW	SV	Y	N
Mojave Black-collared Lizard ( <i>Crotaphytus bicinctores</i> )		FRFO				N	N
Longnose Snake ( <i>Rhinocheilus lecontei</i> )		FRFO				Y	N
Western Ground Snake ( <i>Sonora semiannulata</i> )		FRFO				Y	N
Common Garter Snake ( <i>Thamnophis sirtalis</i> )		FRFO				Y	N
Sagebrush Lizard ( <i>Sceloporus graciosus</i> )					SV	Y	N
Painted Turtle ( <i>Chrtsemys picta</i> )			VALE	UMA	SC	N	N



**Table J-1.** Special Status Fish and Wildlife Species with the Potential to Occur in the Vicinity of the Project (continued)

Species	USFWS <sup>1/</sup>	BLM Boise District <sup>2/</sup>	BLM Oregon District <sup>2/</sup>	USFS R6 <sup>3/</sup>	ODFW <sup>4/</sup>	Potential Habitat within Route	Potential Field Survey Requirement
<b>FISH</b>							
Bull Trout <i>(Salvelinus confluentus)</i>	T, CH	FRFO	VALE; PRIN	UMA; WAW	SC	Y	N
Inland Redband Trout <i>(Oncorhynchus mykiss gibbsi)</i>		FRFO	VALE; PRIN	UMA; WAW	SV	Y	N
Oregon Great Basin Redband Trout <i>(Oncorhynchus myskiss)</i>					SV	Y	N
Middle Columbia River Steelhead <i>(Oncorhynchus mykiss ssp.)</i>	T		PRIN; CEN	UMA; WAW	SV	N (downstream influence)	N
Snake River Basin steelhead <i>(Oncorhynchus mykiss ssp.)</i>	T			UMA; WAW	SV	Y	N
Snake River Chinook (Spring/Summer/Fall Runs) <i>(Oncorhynchus tshawtscha ssp.)</i>	T		VALE; PRIN	UMA; WAW	LT	Y	N
Snake River Sockeye Salmon <i>(Oncorhynchus nerka)</i>	E		VALE	WAW		Y	N
Westslope Cutthroat Trout <i>(Oncorhynchus mykiss ssp.)</i>			PRIN	UMA; WAW	SV	Y	N
Malheur Mottled Sculpin <i>(Cottus bendirei)</i>					SC	N	N
Margined Sculpin <i>(Cottus marginatus)</i>					SV	N	N
Pacific Lamprey <i>(Lampetra tridentata)</i>					SV	Y	N
<b>INVERTEBRATES</b>							
None							

1/ Federally Listed Species: E = Endangered; T = Threatened; C = Candidate; XN = Experimental Non-essential Population; CH = Critical Habitat.

2/ BLM Sensitive Species: FOU = Four Rivers Field Office; PRIN = Prineville District; VALE = Vale Oregon.

3/ Region 6 USFS Sensitive Species: UMA = Umatilla National Forest; WAW =Wallowa-Whitman National Forest; MIS = Management Indicator Species.

4/ Oregon Department of Fish and Wildlife: LE = Listed Endangered; LT = Listed Threatened; SC = Critical Sensitive Species; SV = Vulnerable Sensitive Species; SP = Peripheral Species

**Table J-2.** Special Status Plant Species with the Potential to Occur in the Vicinity of the Project

Species	USFWS <sup>1/</sup>	BLM Idaho FO <sup>2/</sup>	BLM Oregon FO <sup>2/</sup>	USFS R6 <sup>3/</sup>	Potential Habitat within Route	Potential Field Survey Requirement
<b>VASCULAR PLANTS</b>						
Howell’s Spectacular Thelypody <i>(Thelypodium howellii ssp. spectabilis)</i>	T		VALE		Y	Y
Spalding’s Catchfly <i>(Silene spaldingii)</i>	T		VALE	UMA; WAW	N	N
Slickspot Peppergrass <i>(Lepidium papilliferum)</i>	–	FOU	VALE		Y	Y
Macfarlane’s Four O’Clock <i>(Mirabilis macfarlanei)</i>	T		VALE	WAW	N	N

1/ Federally Listed Species: T = Threatened

2/ BLM Sensitive Species: FOU = Four Rivers Field Office; VALE = Vale Oregon.

3/ Region 6 USFS Sensitive Species: UMA = Umatilla National Forest; WAW =Wallowa-Whitman National Forest.

## EXHIBIT K PUBLIC SERVICES

OAR 345-020-011(1)(k)

Information about significant potential adverse impacts of construction and operation of the proposed facility on the ability of communities in the study area to provide the services listed in OAR 345-022-0110.

The following statements apply to both Proposed Corridors and reasonable alternative corridors.

### **Sewers and Sewage Treatment**

Underground utilities will be located prior to excavation to minimize the potential for damage to buried sewer, water, electric, gas, or communication lines. The Project will not cause any impacts to sewer systems.

### **Water**

Water for dust control or construction processes such as concrete batching will be purchased from existing sources. Neither use will require significant amounts of water.

### **Storm Water Drainage**

Storm water BMPs will be implemented during construction. Construction will proceed under an approved construction storm water general permit, as required by the ODEQ.

### **Solid Waste Management**

Substation and ROW construction will generate a variety of solid wastes, including concrete, hardware, and wood debris. Components will be trucked to the project during construction and operation. Excess materials generated during construction will be spread on site (mostly excess material from foundation excavations) or be hauled off-site to be disposed of in accordance with applicable state or federal laws and regulations.

### **Housing**

The proposed Project is not anticipated to have an adverse impact or create a major demand for housing. Many of the workers will come from outside of the Project area and will require temporary housing over a 2-year construction period. Construction workers hired from outside the area will require motels or other rental units. The proposed and alternate corridors generally follow or are near the I-84 corridor, which contains sufficient temporary housing. In addition, construction of the transmission line will proceed in a linear manner with construction dispersed over many miles. The transient workers may benefit the local communities by renting housing for the construction duration.

### **Traffic Safety**

The construction of the transmission line will result in a temporary increase in local traffic, including large trucks and construction equipment. A traffic management plan will be developed to minimize impacts.

## **Police and Fire Protection**

Project plans developed as part of preparing the ASC will provide a framework for construction phase management of personnel, rules of behavior, identification of local police and fire protection resources, and emergency response procedures to be used or followed.

## **Health Care**

The proposed and alternate routes follow the I-84 corridor, which contains sufficient health care facilities to support the Project. The size of the construction workforce is not expected to make significant demands on health care resources. The construction phase of the Project will be covered by a comprehensive health and safety plan.

## **Schools**

The vast majority of construction phase workers typically do not relocate family to the job location. The number of operations phase personnel will be minimal. Impacts to school systems will be minimal for either phase.

**EXHIBIT L WATER USE**

OAR 345-020-011(1)(L)

Information about water requirements the applicant anticipates for construction and operation of the proposed facility, including:

(A) A description of each source of water and the applicant's estimate of the amount of water the facility will need from each source;

(B) If a new water right is required, the approximate location of the points of diversion and estimated quantity of water to be taken at each point;

(C) For operation, the source of cooling water and the estimated consumptive use of cooling water, based on annual average conditions.

Construction of the transmission lines and substations will require water. Major water uses are for preparation and installation of concrete transmission line structure and substation foundations, and dust control during ROW, staging, fly yard, access road, and substation grading and site work. As the preliminary design advances, the total amount of water needed will be identified. The required water will be procured from municipal sources and/or from landowners. No new water rights will be required but if needed, limited licenses will be procured from the Oregon WRD.

In the construction of foundations, water is transported to the batch plant site where it is used to mix wet concrete. From the batch plant the wet concrete is transported to the structure site in concrete trucks for use in foundation installation. Construction of the transmission lines and related facilities will generate a temporary increase in fugitive dust. If the level of fugitive dust is too high in specific Project areas, as determined in cooperation with the landowner or agency, water will be applied to disturbed areas to minimize dust.

Water usage for substation construction is primarily for dust control during site preparation work. During this period, construction equipment will be cutting, moving, and compacting the subgrade surface. As a result, water trucks patrolling the site to control dust will make up to one pass over the station site per hour. Once site preparation work is complete, concrete for the placement of foundations becomes the largest user of water and dust control becomes minimal.

Once site grading is complete, the balance of the substation construction work will be performed on bare subgrade soil or subgrade with a thin layer of rock. Fire risk will be minimal due to the bare ground or rock surface and will be contained within the confines of the fenced area.

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## **EXHIBIT M      CARBON DIOXIDE EMISSIONS**

OAR 345-020-011(1)(m)

If the proposed facility would emit carbon dioxide, an estimate of the gross rate of carbon dioxide emissions, a table listing all the factors that form the basis for calculating the estimate, and a statement of the means by which the applicant intends to comply with the applicable carbon dioxide emissions standard under OAR 345-024-560, OAR 345-024-600, or OAR 345-024-630.

The Project will not emit carbon dioxide.

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## **EXHIBIT N      LEGAL CITATIONS**

OAR 345-020-011(1)(n)

Identification, by legal citation, of all state statutes and administrative rules and local government ordinances containing standards or criteria that the proposed facility must meet for the Council to issue a site certificate, other than statutes, rules and ordinances identified in Exhibit E, and identification of the agencies administering those statutes, administrative rules and ordinances. The applicant shall analyze and describe any problems the applicant foresees in satisfying the requirements of any such statute, rule or ordinance.

All state statutes, administrative rules, and local government ordinances containing standards or criteria that the proposed facility within the proposed or alternate corridors must meet are identified in Exhibit E. The agencies administering these statutes, administrative rules, and ordinances are also identified in Exhibit E.

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## **EXHIBIT O      SITE CERTIFICATION SCHEDULE**

**OAR 345-020-011(1)(o)**

A schedule stating when the applicant expects to submit an application for a site certificate;

The Applicant expects to submit an ASC in the first quarter of 2011.

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**EXHIBIT P STATE COMMISSION ON INDIAN SERVICES****OAR 345-020-011(1)(p)**

Evidence of consultation with the State Commission on Indian Services to identify each appropriate tribe to consult with regarding the proposed facility's possible effects on Indian historic and cultural resources.

Idaho Power contacted the State Commission on Indian Services on May 27, 2010, to identify each appropriate tribe to consult with regarding the proposed facility's possible effects on Indian historic and cultural resources within the Proposed Corridor. Tribes identified as being expected to have an interest in the Project's Proposed Corridor include:

**Burns-Paiute Tribe**

Ms. Theresa Peck, Culture and Heritage Coordinator  
100 Pasigo Street  
Burns, OR 97720

**Shoshone-Paiute Tribes of Duck Valley Indian Reservation**

Mr. Ted Howard  
P.O. Box 219  
Owyhee, NV 89832

**Confederated Tribes of the Umatilla Indian Reservation**

Ms. Teara Farrow, Cultural Resources Program Protection Manager  
46411 Timine Way  
Pendleton, OR 97801

**Confederated Tribes of Warm Springs Reservation of Oregon**

Ms. Sally Bird, Cultural Resources Coordinator  
P.O. Box 460  
Warm Springs, OR 97761

**Nez Perce Tribe**

Ms. Vera Sonneck, Cultural Resources Coordinator  
P.O. Box 365  
Lapwai, ID 83540

**Confederate Tribes of the Colville Reservation**

Ms. Camille Pleasants, History and Archeology Department Chair  
P.O. Box 150  
Nespelem, WA 99155

**Fort McDermitt Shoshone-Paiute Tribes**

Tribal Chair, Billy Bell  
P.O. Box 457  
McDermitt, NV 89421

**Shoshone-Bannock Tribes of Fort Hall Indian Reservation**

Carolyn Smith, Cultural Resources Coordinator  
P.O. Box 306  
Fort Hall, ID 83203

**Klamath Tribes**

Perry Chocktoot, Cultural and Heritage Director  
P.O. Box 436  
501 Chiloquin Blvd  
Chiloquin, Oregon 97624

In addition to Oregon EFSC approval, the Project requires a BLM ROW Grant. Part of BLM's responsibility includes government-to-government consultation with affected Indian tribes.