

Date: October 23, 2008

To: Walt George

From: Stacey Backzowski, Idaho Power Company

Subject: Revised Routing in Response to Concerns Raised by BLM and Cooperating Agencies

This memo and its attached figures and table are provided as a supplement to the Companies' September 2008 Gateway West Transmission Line Siting Study. The purpose of the supplement is to:

1. Demonstrate the Companies' commitment to ongoing cooperation with the BLM and cooperating agencies;
2. Provide modifications to the Companies' proposed routes such that the revised routes avoid, to the extent feasible, sensitive resources and major concerns raised by the local BLM Field Offices (FO) and cooperating agencies; and
3. Propose reasonable and viable alternatives and work to design modifications to them that, while not preferable from an engineering and cost standpoint, are constructible and avoid, to the extent feasible, sensitive resources and major concerns raised by the local BLM FOs and cooperating agencies.

This memo proposes a resolution to the concerns raised during teleconferences held with the Kemmerer FO and cooperating agencies, including Fossil Butte National Monument, on September 23, 2008 and with the remaining Field, District, and State Offices and cooperating agencies September 30, 2008. It also proposes resolution to concerns raised both on the September 30 call and the follow-up visit to the Burley FO on October 3, 2008. In each of these coordinating calls, a few issues were raised, either with the proposed route or with alternative routes that required either additional information or route revision.

In response to this memo, the Companies anticipate that the BLM ID Team and cooperating agencies will agree that:

1. Modifications to the proposed route that resolve identified problems will eliminate the need for alternatives that otherwise resolve those concerns (Rawlins FO, Burley FO);
2. Modifications to a proposed alternative preferred by the Kemmerer FO are acceptable and that the slightly modified alternative and route variations will be carried forward into the EIS and studied in detail;
3. The additional information provided for alternatives which the Companies initially proposed as "considered but not proposed for detailed study" is sufficient for that classification to remain unchanged (Burley FO); and

4. Other changes to route locations and proposed and alternative route categories will be acceptable.

The Companies look forward to BLM's announcement of alternatives to carry forward for detailed analysis and to continue their cooperation with the BLM and the cooperating agencies throughout the environmental permitting process.

This memo is organized by Field Office and details a resolution to each of the concerns raised.

Rawlins FO

Concern 1—Concerns regarding the Seven Mile-Hill wind farm expansion and the potential for the proposed route affect several Leaks. Rawlins FO proposed a route further to the west.

Response: Recently PacifiCorp initiated siting studies for the Gateway South Project. As proposed, both Gateway West and Gateway South will exit the planned Aeolus Substation in a southwesterly direction and both must avoid conflicts with PacifiCorp's Seven Mile Hill wind farm and its expansion. PacifiCorp has provided the final locations of the wind farm turbines for the Seven Mile Hill wind farm and its expansion (see Figure 1-1). Based on the need for two planned transmission lines to exit Aeolus, the following routing solutions are proposed:

1. Gateway West would proceed due west and then south along the route alignment identified by BLM, Rawlins FO (Red).
2. Gateway South would exit the Aeolus Substation in a southerly direction parallel to the existing 230kV transmission line and would maintain a distance of at least 2,250 feet from the nearest wind turbine, thus meeting reliability criteria as well as avoiding adverse impact on the wind farm (Blue).
3. The proposed route identified in the Siting Study would be changed to an alternative 'considered not proposed for detailed study in the EIS (Purple).'

Kemmerer FO

Concern 2: In discussion on September 23, the BLM and cooperating agencies, and the siting group agreed on four routes to be analyzed in detail—Proposed route, route along existing transmission lines (Governor's office route), the route adjacent to Highway 30 and the southern route proposed by the FO. Several adjustments were requested to the southern route.

Response: Three route adjustments were evaluated:

- Segment 4b.1- 4b.4 – This segment was suggested as part of a longer alternate corridor routed to parallel in proximity to US 30/89 west of Kemmerer. However, this first segment was eliminated from further consideration because it does not use the crossing of coal lease lands agreed on with Chevron mining staff. It also crosses through about four miles of coal lease lands and a sage grouse lek buffer as it proceeds toward US 30/89. As shown on Figure 2-1, this alternate corridor was adjusted to follow a route segment common to all three alternates in this area between points 4.b.1 and 4.b.2 and in doing so, crosses through Chevron coal lease lands in the area agreed on. The corridor then turns north toward US 30/89 at point 4.b.2.
- Segment 4b.1, 4b.2, 4b.5, 4b.6 –In response to concerns about the visibility of transmission structures from Fossil Butte National Monument (NM) this additional

alternative was developed based on the viewshed from the visitors' center as shown on Figure 2- 2. In developing this route alignment the route was shifted south off of the highest points along Fossil Ridge. Based on the use of double circuit structures about 160 feet tall it appears that the structures could be screened by topography from this location substantially reducing or eliminating visual impact. Also this alternate has been routed to avoid other localized constraints such as sage grouse leks and buffers, oil and gas wells and raptor nests and buffers. Therefore, those on the call agreed that this re-aligned alternative be analyzed in detail in the EIS and corridor segment 4.b.3 as shown on Figures 2-1 and 2-2 be changed to "considered but not proposed for detailed study in the EIS" (Purple).

- Segment 4b.6 – 4b.8 - the portion of this alternate near the intersection of US 30/89 and State Route 89 crosses through an airport controlled space (not shown on Figure 2-1). This BLM and siting team agreed that this corridor segment should be retained for detailed analysis in the EIS with the understanding that an engineering assessment will result in minor alignment changes that will mitigate impacts to flight operations.

Pocatello FO

Concern 3: Concerns regarding the Deep Creek segments 5 and 7 were raised. If an alternative across the Fort Hall Indian Reservation can be feasibly added, then Pocatello FO staff will recommend dropping southern route. If not, staff wants to add a southern route for detailed study.

Response: Idaho Power continues to believe that a route through the Fort Hall Indian Reservation is infeasible. The Company is communicating with the Tribe on this issue to ascertain their position. This communication will take time to bring to a conclusion. Once concluded the results will be reported to BLM.

The routes shown on Figure 3-1 designated as 7a-5f-5d and 7a-7a.1-7d and the route through the Fort Hall Indian Reservation have been added as alternatives to be studied in detail in the EIS.

Burley FO

Concern 4: The proposed route is in proximity to the Oregon Trail and the Hudspeth's Cutoff/California Trail in the vicinity of nodes 7e-7u-7g on Segment 7.

Response: The Companies modified the proposed route to the south to avoid a sage grouse lek and provide more distance between the intersection of Hudspeth's Cutoff and the Oregon Trail. The new proposed route has been designated as 7e-7v-7g on Figure 4-1. In addition, the crossing of both trails would occur over agricultural lands where no remnant features of the trails exist.

Concern 5: The proposed route between nodes 7g and 7h passes through a portion of BLM land that does not allow rights of way without modification to the Cassia RMP.

Response: The Companies developed an alternative route that avoids the BLM land in the Cassia RMP that doesn't allow for ROWs. However, it is closer to the Oregon Trail. This alternative is designated as 7g-7w-7h on Figure 5-1.

Concern 6: All BLM lands near where proposed and alternate routes cross the East Hills are known nesting habitat for sage grouse and are also designated as "key habitat" (Idaho Sage Grouse Habitat Map, 2007)

Response: To the extent possible, the proposed and alternate routes in the East Hills area between points 7h-and 7y were modified to either avoid or minimize the crossing of "key

habitat” for sage grouse. Figure 6-1 shows the locations in which these routes have been modified.

Concern 7: Between the nodes 7j and 7l, there is an informal hang gliding launch location that takes off from BLM land. Hang gliding occurs in generally a westerly direction, towards the proposed route.

Response: An alternative exists (7j-7l) that was originally developed to avoid impacts to sage grouse leks and rural residential properties. This alternative would pass to the east of the hang gliding launch location, thus providing less of an impact to this recreational activity (Figure 6-1).

Concern 8: In the vicinity of 7m, the proposed route crosses big game winter range that will require seasonal restrictions.

Response: The Companies modified the proposed route (7y) to avoid the area that has the big game winter range seasonal restriction (Figure 6-1).

Concern 9: In the vicinity of the Cedar Hill substation, there is a Jan 15 to March 16 motorized vehicle closure (winter range, mule deer, sage grouse), that may restrict access for maintenance and emergency repairs.

Response: Where practicable, the Companies have moved the proposed route and developed an alternate route (7z) to the border of the BLM/private land interface with the understanding that if emergency repairs are needed, it would be more likely permissible to access the line if it is on the border of the restricted area, rather than through the middle (Figure 9-1).

Concern 10: BLM commented that in the siting report, the alternative discussion for the portion from 7h to 7s did not clearly demonstrate why the route was considered but eliminated.

Response: The siting report did not describe in sufficient detail the impacts of crossing large portions of irrigated agriculture (specifically center pivot systems) in a diagonal fashion (northeast to southwest). This method of crossing agricultural land does not provide the same utility as crossing in the cardinal directions where the unirrigated corners of fields can be used for tower spotting and the conductor is positioned at the end of the center pivot, rather than crossing over top of the center pivots. Table 10-1 below compares three routes on Segment 7 where the Burley FO identified constraints or issues with the proposed, alternate or considered but eliminated routes. As requested by the BLM, these comparisons are made from a common beginning at 7g and ending at 9 – the proposed location of the Cedar Hill Substation) as shown on Figure 10-1.

The advantages of the 7g-7h-7j-7x-7n-7s-9 route when compared to the proposed route are as follows:

- Is 1.8 miles shorter than the proposed route;
- Contains no residences or structures within 300 feet of the centerline as compared to 5 for the proposed route ;
- Avoids BLM VRM class 2;
- Passes through 2.66 less miles of grazing lease areas than the proposed route;
- Avoids raptor and sage grouse lek buffers; and
- Traverses 4.1 miles less slope >15% than the proposed corridor.

The disadvantages of the 7h to 7s route when compared to the proposed route are as follows:

- Has 54 more occurrences of residences or structures within 750 feet of the centerline, as compared to 11 for the proposed route;
- Has 116 more occurrences of residences or structures within 1000 feet of the centerline, as compared to 31 for the proposed route;
- Has one more crossing of historic trails than the proposed route;
- Crosses 4.17 miles more of irrigated farm land; and
- Crosses one more major road than the proposed route.

Concern 11: Provide additional documentation regarding why the freeway (I-84) route is not recommended for detailed analysis.

Response: Table 10-1 compares the proposed route to the I-84 route. As with the previous discussion, these comparisons are made from a common beginning at 7g and ending at 9 – the proposed location of the Cedar Hill Substation as shown on Figure 10-1.

Advantages of the I-84 alternative corridor include:

- Does not cross BLM VRM class 2 or 3;
- Avoids raptor nest and sage grouse lek buffers;
- Crosses 4.14 miles less big game crucial winter range than the proposed route;
- Passes through 10.3 less miles of grazing lease areas;
- Has two fewer occurrences of pipeline buffer than the proposed route;
- Crosses one less segment of scenic highway than the proposed route; and
- Crosses 7.22 miles less slope >15% than the proposed corridor.

Disadvantages of this alternative corridor include:

- A community advisory committee (CAC) is working with Idaho power to create a plan to address the Magic Valley's long term electric demand. The CAC has identified as a priority the need to locate a new 500kV substation at Cedar Hill which will serve as a hub for 230kV transmission lines to provide reliable service throughout the valley. The I-84 route would add 5.4 miles of additional length of 500kV transmission line in a rapidly growing area with no increase in reliability.
- Has 64 more occurrences of residences or structures within 300 feet of the centerline, as compared to 5 for the proposed route;
- Has 460 more occurrences of residences or structures within 750 feet of the centerline, as compared to 11 for the proposed route;
- Has 853 more occurrences of residences or structures within 1000 feet of the centerline, as compared to 31 for the proposed route;
- Crosses 23.44 miles more of irrigated farm land than the proposed route;
- Crosses 9.05 miles more land considered prime farm land than the proposed route; and
- Encroaches upon the City of Hayburn

Shoshone FO

Concern 12: The Midpoint to Kinport 345kV Transmission line proposed to be energized at 500kV between Borah and Midpoint substations is not located correctly on Figure 4-8 in the Siting Study and does not have the correct list of aliquot parts in the POD.

Response: The map provided by BLM (originally provided to BLM by Idaho Power) is the Midpoint-Borah Junction 345 kV Line #850 that is built to 500 kV specifications. It currently operates as the Midpoint-Kinport 345 kV line. Figure 4-8 of the Siting Study will be revised accordingly, as will the table of aliquot parts in the POD.

Concern 13; The Revised POD submitted in August identified the need to locate a regeneration station approximately midpoint along Segment 6. Concern was raised as to whether this would be located on BLM administered lands.

Response: A regeneration station is no longer required along this segment. The next revision of the POD will note that a regeneration station is not required.

Boise DO:

Concern 14: BLM advised that the southern alternative through the Birds of Prey is inconsistent with the NCA management plan.

Response: The BLM agreed that alternative 8g-8p-11 will be re-designated as “considered not proposed for detailed study in the EIS”.

Concern 15: BLM advised that the northern alternative through the Birds of Prey is inconsistent with the NCA management plan.

Response: The BLM agreed that alternative 8h-8i-8j will be re-designated as “considered not proposed for detailed study in the EIS”.

Concern 16: The NF felt that the revised corridor through the Cache National Forest wasn't exactly as provided by the NF.

Response: *The Companies explained that the corridor was modified slightly based on terrain and that the final alignment would be worked out in cooperation with NF representatives.*

Table 10-1 Major Alternate Route Comparison

Feature	Proposed Route		Alternate (I-84 route)		Alternate (Agriculture lands)	
	Frequency	Length (mile)	Frequency	Length (mile)	Frequency	Length (mile)
	7g-7h-7j-7k-7l-7y-7t-7s-9		7g-7i-9		7g-7h-7j-7x-7n-7s-9	
BLM	10	10.22	1	0.05	6	7.70
State	1	0.52	4	3.39	3	1.55
Private	12	35.31	4	48.02	10	34.99
Total Length		46.04		51.46		44.24
WWEC	2	0.39			2	0.39
Airport Zones			1	0.27		
Urban Area			1	0.32		
House w/in 300ft	5	0.22	64	2.73		
House w/in 750ft	11	1.77	460	23.13	54	5.05
House w/in 1000ft	31	4.15	853	40.97	116	10.56
VRM class 2	2	0.96	3	0.90		
VRM class 3	11	7.99	4	9.39	11	9.43
VRM class 2 on BLM	1	0.01				
VRM class 3 on BLM	10	4.61			10	4.61
Sage-grouse Lek - 0.65mi	1	0.79				
Big Game Crucial Winter	3	4.17	1	0.03	3	4.17
Faults	2	0.52			1	0.28
Grazing Lease Area	10	10.35	1	0.05	6	7.69
Historic Trail	3	3.64	3	2.23	4	2.39
Irrigated Agriculture	59	18.50	80	41.94	69	22.67
Lakes	3	0.09				
Major Roads	3	0.82	3	1.57	4	0.77
Pipeline Buffer	3	1.18	1	0.15	3	1.18
Prime Farmlands	70	23.22	109	41.27	72	22.84
Railroad	1	0.67	2	1.19	1	0.58
Raptor Buffer	2	1.11				
Scenic Highway	2	3.20	1	4.17		
High Slope	32	7.52	3	0.30	23	3.42
Transmission Line Outer Buffer	6	0.66	4	2.36	6	0.64
Transmission Line Inner Buffer	5	1.16	4	6.64	5	1.51