Planning Commission Staff Report

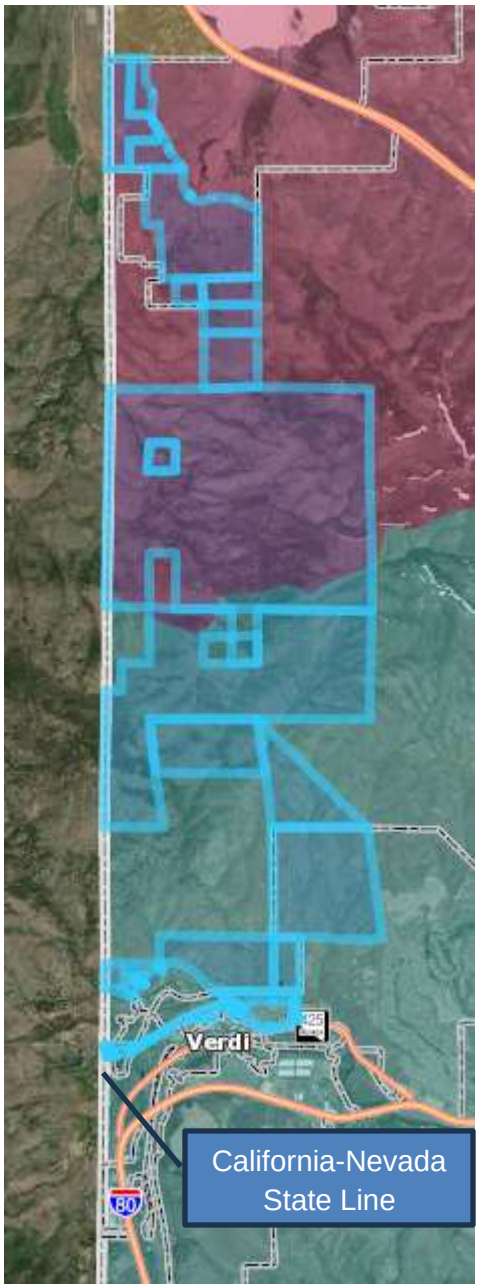
Meeting Date: May 7, 2024 **Agenda Item: 9C**

SPECIAL USE PERMIT CASE NUMBER:	WSUP23-0032 (NV Energy)
BRIEF SUMMARY OF REQUEST:	Request to construct a 10.8-mile, 120 kV transmission line
STAFF PLANNER:	Tim Evans, Planner Phone Number: 775.328.2314 E-mail: TEvans@washoecounty.gov

CASE DESCRIPTION

For hearing, discussion, and possible action to approve a special use permit for a major public facility use type for NV Energy to construct, operate, and maintain a new 10.8-mile long (11.9 miles including California and Nevada portions – 6.8 miles in Washoe County, 4.1 miles in the City of Reno, and 1.1 miles in California), 120 kV overhead transmission line connecting the California substation near Verdi to the Bordertown substation. The project will entail 53,000 cubic yards of excavation (cut) for access road widening and the applicant is requesting to waive all landscaping and parking requirements and to vary the maximum height of the applicable regulatory zones to allow for pole heights as high as 105'. This project meets the standard for a project of regional significance (PRS) because it entails construction of a transmission line that carries 60 kV or more. It will require approval by the regional planning authorities before any approval at the County level would take effect. This project also requires amendments to the Regional Utility Corridor Map of the 2019 Truckee Meadows Regional Plan to identify the location of the new transmission line. As this project encompasses areas within Washoe County and the City of Reno, the Regional Planning Commission will sponsor the changes to the Regional Utility Corridor Map in one single amendment as opposed to the Washoe County Commission and the City of Reno City Council sponsoring individual amendments. This project will need to comply with all Federal and State approvals before any approval at the County level would take effect.

Applicant:	NV Energy
Property Owners:	Myers 2017 Trust, Raymond A; NV Energy; Emery, Allyn; Lucas, Stan; Churchill Trust et al., David E; USFS; Lifestyle Homes TND LLC; Kronish Trust, Herbert; Inskip et al, Richard R; King, Clinton W
Location:	Traversing parallel to the California-Nevada boundary,



Vicinity Map

	north of Highway 80 and south of Highway 395	
APN(s):	038-822-01; 038-821-20; 038-842-01; 038-042-20; 038-043-05; 038-044-06; 038-045-46; 038-060-37; 038-280-43; 238-320-04; 038-010-07; 038-010-05; 081-170-10; 081-070-06; 081-070-29; 081-050-46; 081-010-01; 081-010-05; 081-010-06; 558-010-06; 081-010-18; 081-110-06; 081-110-05; 081-110-04; 038-550-44; 081-070-20; 081-050-11	
Parcel Size:	3.33, 10.01, 0.07, 0.70, 0.71, 1.03, 1.21, 12.16, 1.22, 59.93, 80.00, 643.88, 320.00, 320.00, 1506.08, 2928.64, 160.00, 80.00, 80.00, 40.21, 474.99, 65.36, 159.20, 56.38, 326.02, 40.00, 40.00	
Master Plan:	Suburban Residential, Rural, and Open Space	
Regulatory Zone:	Low Density Suburban (LDS), Public Semi Public Facilities (PSP); General Rural (GR); Open Space (OS)	
Area Plan:	Verdi and North Valleys	
Development Code:	Authorized in Article 810, Special Use Permits & Article 812 Projects of Regional Significance	
Commission District:	1 – Commissioner Hill; 5 – Commissioner Herman	

STAFF RECOMMENDATION

APPROVE **APPROVE WITH CONDITIONS** **DENY**

POSSIBLE MOTION

I move that, after giving reasoned consideration to the information contained in the staff report and information received during the public hearing, the Washoe County Planning Commission approve with conditions Special Use Permit Case Number WSUP23-0032 for NV Energy for the construction of 6.8 miles of a 120kV transmission line within unincorporated Washoe County, with the conditions included as Exhibit A to this matter, having made all five findings in accordance with Washoe County Code Section 110.810.30. I further move to vary the development code standard in Table 110.406.05.1 to allow transmission poles up to 105 feet in height, waive the parking standards of Article 410, waive the landscaping standards of Article 412, and the 3:1 slope standard of Article 438 of the Washoe County Development Code.

(Motion with Findings on Page 19)

Staff Report Contents

Exhibits Contents

The technical reports submitted with the project application are extensive. To review the complete project application with technical reports on-line click *here* or contact Planning at Planning@washoecounty.gov to have a copy sent by email.

Special Use Permit

The purpose of a special use permit is to allow a method of review to identify any potential harmful impacts on adjacent properties or surrounding areas for uses that may be appropriate within a regulatory zone; and to provide for a procedure whereby such uses might be permitted by further restricting or conditioning them so as to mitigate or eliminate possible adverse impacts. If the Planning Commission grants an approval of the special use permit, that approval is subject to conditions of approval. Conditions of approval are requirements that need to be completed during different stages of the proposed project. Those stages are typically:

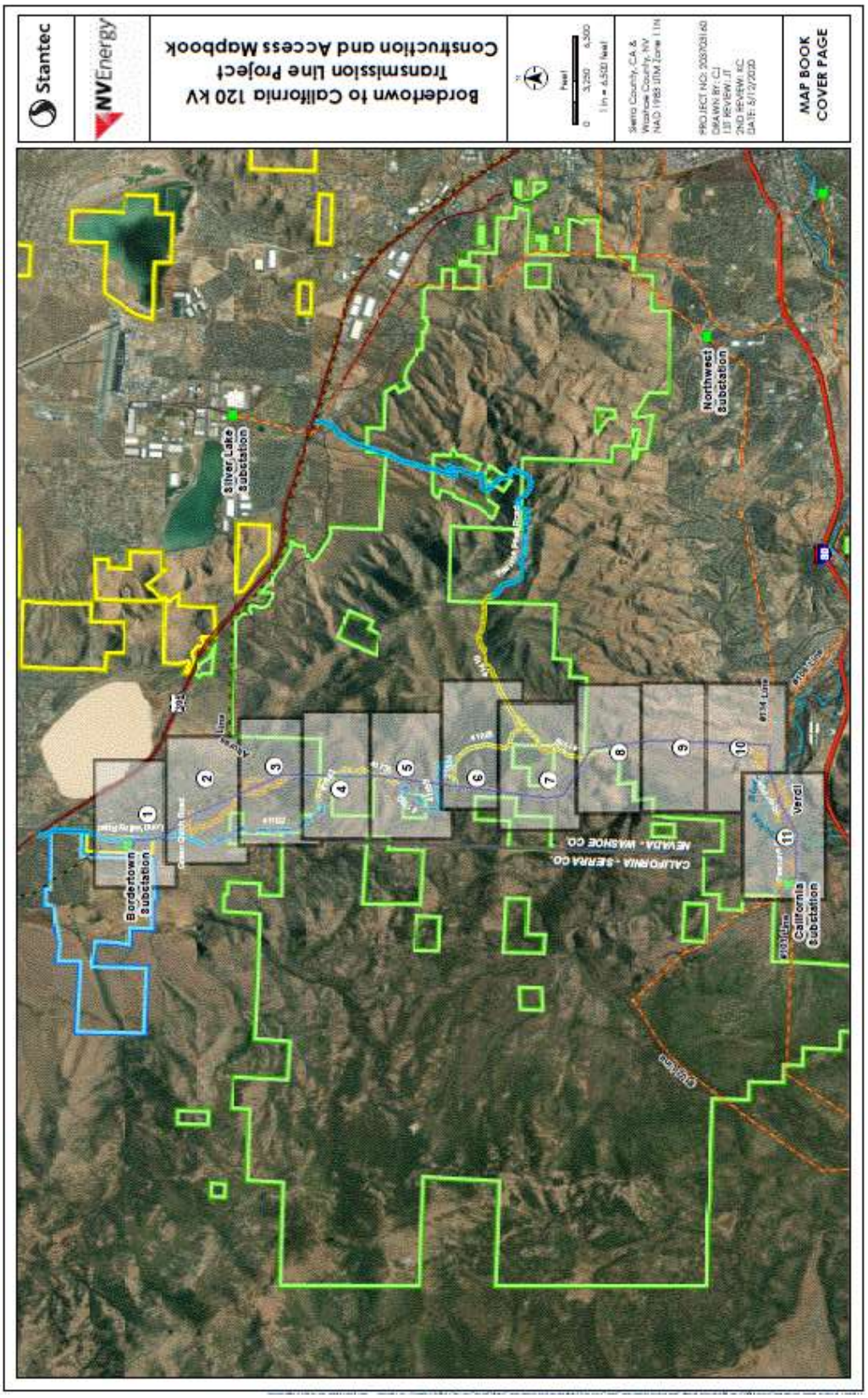
- Prior to permit issuance (i.e. a grading permit, a building permit, etc.)
- Prior to obtaining a final inspection and/or a certificate of occupancy on a structure
- Prior to the issuance of a business license or other permits/licenses
- Some conditions of approval are referred to as "operational conditions." These conditions must be continually complied with for the life of the business or project.

The conditions of approval for Special Use Permit Case Number WSUP23-0032 are attached to this staff report and will be included with the action order.

The subject properties have regulatory zones of Low Density Suburban (LDS), Public Semi-Public Facilities (PSP); General Rural (GR); and Open Space (OS). The proposed 10.8-mile long, 120 kilovolt (kV) overhead transmission line connecting the California substation near Verdi to the Bordertown substation located in California, is classified as a "utility services" use, which is permitted in LDS, PSP, GR, and OS with a special use permit per WCC Section 110.302.05, *Table of Uses*, Table 110.302.05.2, *Table of Uses (Civic Use Types)*. This project meets the standard for a project of regional significance because it is an extension of a transmission line that carries 60 kV or more. Therefore, the applicant is seeking approval of this special use permit from the Planning Commission.

Additionally, Article 810, Special Use Permits, allows the Planning Commission to vary development code standards in conjunction with the approval process per WCC 110.810.20(e). The Planning Commission will be ruling on the request(s) to vary standards below:

Variance(s) Requested	Relevant Code
Maximum height of 105 feet instead of 35 feet	Table 110.406.05.1
Waive all landscaping requirements for a civic use	Article 412
Waive all parking requirements for a civic use	Article 410
Vary the slope requirement to allow slopes steeper than 3:1	Article 438



Site Plan

(Note: Transmission Line is Denoted by the Purple Line)

Project Evaluation

The applicant, NV Energy, is requesting a special use permit for a "Utility Services" use type to construct, operate, and maintain a new 10.8-mile long (11.9-miles including California and Nevada portions), 120 kV overhead transmission line connecting the California substation near Verdi to the Bordertown substation. The project will entail 53,000 cubic yards of excavation (cut) for access road widening and the applicant is requesting to waive all landscaping and parking requirements as well as vary the maximum height of the applicable regulatory zones to allow for pole heights as high as 105', as well as vary grading standards to temporarily allow 3:1 or steeper slopes.

The proposed transmission line traverses through mostly open rural areas, with the exception of the area in Verdi. The transmission line will traverse near approximately fourteen (14) homes within an approximate distance of one hundred and thirty (130) feet. However, it should be noted that the poles that will be placed near homes will only be the replacement of existing poles.

A portion of the rural areas in which the project is involved includes United States Forest Service (USFS) lands. Due to the project traversing USFS lands, the portion of the project traversing the USFS lands is subject to the preparation of an Environmental Impact Statement (EIS). An EIS was prepared for this project and took approximately seven (7) years (2011 to 2018) to prepare for this project, which analyzed multiple alternatives to the proposed transmission line route and included significant mitigation measures to address potential consequences of the proposed project, identifies positive and negative effects for the environment, and offers alternative actions, including inaction, in relation to the proposed project.

According to the applicant, the purpose of the transmission line is to provide the following:

> "[R]eliable bulk transmission capacity to west Reno consistent with North American Electric Reliability Corporation (NERC) Standard TPL-002-0. Historical load growth in the area, particularly on the west side of Reno has created bulk electrical transmission problems. Almost all of the power generation in the area's 120kV system is on the east side of Reno. The North Valley Road 345/120kV substation in north central Reno is currently used to move power through a network of 120kV lines to the west side. During periods of heavy load, loss of one line in the network could overload the remaining lines, causing a failure that could result in outages in west Reno, not meeting the NERC requirement."

The applicant states the following in the application:

> *The transmission line is approximately 12.0 miles long with 10.9+/- miles in Nevada. Approximately 6.8 miles of the run in Nevada lies within unincorporated Washoe County while the remaining 4.1+/- miles lies within the jurisdiction of the City of Reno. From the Bordertown Substation, it heads southwest, paralleling the west side of the Alturas 345-kV transmission line. It then generally parallels the California and Nevada state line, staying on the Nevada side by approximately 0.6 to 0.9 miles east of the state line for approximately 6 miles. The line then jogs another approximately 0.7 miles to the east, approximately 1.5 miles from the state line which it parallels for another 3 miles before turning due west. The last 2+/- miles will parallel to the existing #114 and #106 lines through Verdi to the California Substation.*
>
> *The 120-kV transmission line will consist of three aluminum composite core conductors, one fiber optic shield wire cable, and one steel shield wire cable supported on single circuit pole structures. A combination of single-pole structures, two-pole H-frame structures, and three-pole dead end/angle structures will be used. Single-pole structures will be used less frequently where confined space prevents the use of two-pole H-frame or three-pole dead end/angle structures, which are wider than the single-pole structures. The ROW/easement*

width will be reduced from 90 feet to 40 feet in constrained areas where single pole structures are used. The span distance between the poles will average 800 feet but could range from 200 feet to 2,000 feet depending on terrain or obstructions.

The last approximately 2 miles will replace the existing H-frame pole structures of the inactive 60 kV #632 distribution line in its existing location, and parallel to the existing #114 and #106 lines through Verdi to the California Substation. A total of approximately 4.4 miles of transmission line route will be located within an existing power line corridor.

The new transmission line will consist of seventy-eight (78) poles along the 10.8-mile route – of those seventy-eight (78) poles, thirteen (13) poles will be the replacement of existing poles. This will include a total number of 52 poles in unincorporated Washoe County.

The type of poles used for the transmission line will vary in design depending on the location along the line and will vary in size up to a maximum height of one hundred and five (105) feet. There will be five (5) types of poles: double circuit H-frame tangent with static wire, H-frame tangent with static wire, heavy loading H-frame tangent with static wire, three (3) pole dead-end angle with static wire dead-end steel pole, and double circuit 3-pole angle static wire dead-end steel pole. Examples of the poles may be found in "Tab B" of Exhibit E.

The poles, on average, will be spaced an average of eight hundred (800) feet apart and, due to their design, should have minimal disturbance to the area. The utility line will be within a variable utility corridor of 300-600 feet in width – the width varies depending on the location along the transmission line.

This project meets the standard for a project of regional significance because it entails construction of a transmission line that carries 60 kV or more. It will require approval by the regional planning authorities before any approval at the County level would take effect. The project requires amendments to the Regional Utility Corridor Map to identify the location of the new transmission line.

As this project encompasses areas within Washoe County and the City of Reno, the Regional Planning Commission (RPC) will sponsor the changes to the Regional Utility Corridor Map in one single amendment as opposed to the Washoe County Commission and the City of Reno City Council sponsoring individual amendments.

Article 406 – Building Placement Standards

Pursuant to Table 110.406.05.1, *Density and Intensity Standards*, the allowed height for the General Rural (GR) regulatory zone is 35 feet and 65 feet in the Public/Semi-Public (PSP) regulatory zoning. The applicant is requesting to vary the 35-foot and 65-foot maximum heights to allow a maximum of 105-foot-tall towers in various locations. Staff supports varying this development standard as 105-feet is the typical standard height for the proposed transmission tower.

The proposed poles to be used for the transmission line will range between 50 feet to 105 feet in height depending upon the location, angle of the line at the pole, topography, or necessary crossings of other elements.

Pursuant to Table 110.406.05.1, Density and Intensity Standards, within the areas zoned Low-Density Suburban (LDS), the proposed towers meet the thirty-five (35) foot height limit and the proposed towers do not exceed the height of the Open Space (OS) regulatory zone as it does not have a maximum height listed. As such, no deviation from the stipulated heights for the OS zoning designation would be necessary.

Article 410 – Parking and Loading

Parking for the utility services use type is determined during the review process for the special use permit. The applicant has requested to waive the parking requirements for the utility services

use type within Article 410, Parking and Loading, of Washoe County Code. Staff is supportive of this request due to the nature of the project being an unmanned transmission line. Annual inspections of the line will occur, and NV Energy will patrol the ROW/easement after unexplained outages or significant natural incidents (e.g., fires, earthquakes, floods, torrential rains, or extreme electrical storms) to observe the facility conditions and surrounding environment and to begin repairing any damages.

Article 412 – Landscaping

The project as proposed provides no formal landscaping. The applicant has requested to waive the landscaping requirements for a civic use type within Article 412, Landscaping, of Washoe County Code. Staff is supportive of this request as formal landscaping around transmission poles would not provide visual shielding and would generally look out-of-place with the surrounding environment. Additionally, the transmission lines are located in an area with native vegetation and no available water for irrigation.

Article 414 – Lighting and Sound

Due to the nature of the project, there will no impacts due to lighting or sound.

Article 438 – Grading

The applicant stated the following on the special use permit application:

> "The proposed grading is to provide for temporary access to the power line route in certain areas during construction. We are requesting limited grading to occur at points along the route including widening of existing USFS access roads and the creation of temporary access roads to construct the line. Restoration is required by the USFS through the FEIS for the graded areas after the construction of the line is complete."

The applicant is proposing temporary grading totaling 53,000 cubic yards to be excavated in association with the necessary grading for access and road widening. Pursuant to WCC Section 110.438.35(b)(2), a special use permit is not required for major grading as part of public utilities within the public right-of-way or a public utility easement – the proposed transmission line will be within public utility easements, federal permits/rights-of-way, and regional utility corridors.

While a special use permit for grading is not required, a building (grading) permit for the grading will be required and the project will be subject to the applicable grading requirements of Article 438, *Grading Standards*. In order to allow the construction of slopes adjacent to temporary access roads, the applicant is requesting to vary the 3:1 slope standard set forth in Article 438, Grading Standards. The request proposes 2:1, 1:1 and 2' maximum height vertical cut slopes on the uphill side of the roadways. Additionally, the existing graded access roads are nearly exclusively on United States Forest Service (USFS) land and the temporary grading has already been reviewed, approved and conditioned by the USFS. Remediation of the temporarily graded areas is required by the USFS and will occur after the construction is complete.

Washoe County Engineering reviewed the request to vary the 3:1 grading standard and agrees with the request. A condition of approval from Engineering serves to address varying the 3:1 slope standard.

Article 505 – Signs

Per the application, the only signage proposed is safety signage that will be less than two (2) square feet in size, which pursuant to WCC Section 110.505.05(b)(5), "signs posted to warn against trespassing, security, or dangerous conditions on the property not exceeding 2 square feet in size" are exempt from the requirements of Article 505, Signs.

Article 812 – Projects of Regional Significance

This project meets the standard for a project of regional significance because it will create a power transmission line with a capacity of 60 kV or more and will require an amendment to the Truckee Meadows Regional Planning Agency (TMRPA) Regional Utility Corridor Map. As a Project of Regional Significance, this application requires conformance review from TMRPA. As this project encompasses areas within Washoe County and the City of Reno, the Regional Planning Commission will sponsor the changes to the Regional Utility Corridor Map in one single amendment as opposed to the Washoe County Commission and the City of Reno City Council sponsoring individual amendments. Thus, if the Planning Commission approves the Special Use Permit, it shall not be issued until the regional planning authorities have taken final action in accordance with WCC Section 110.810.40.

Washoe County Master Plan—Conservation and Open Space

The proposed transmission line traverses through the habitat for mule deer and black bear per the wildlife maps in the Master Plan, specifically the key winter, summer, and year-round habitats for the mule deer and the habitat/range for the black bear – see maps on the next two pages. The classifications are related to the habitat management efforts of the Nevada Department of Wildlife (NDOW).

Goal three (3) of the Master Plan's Conservation and Open Space element is as follows:

> "Regulate or mitigate development to protect environmentally sensitive and/or critical land, water and wildlife resources that present development hazards or serve highly valuable ecological functions."

As part of this goal, policy C.3.1 and policy C.13.1 directs the county to protect key wildlife habitats and migration routes where available information indicates a need to do so.

To address possible impacts to key wildlife habitats, project information was sent to NDOW for review and the following response was received:

> "For item 1, NDOW has been coordinating with NV Energy on the project on minimization and mitigation measures. We do not have any additional comments on this project."

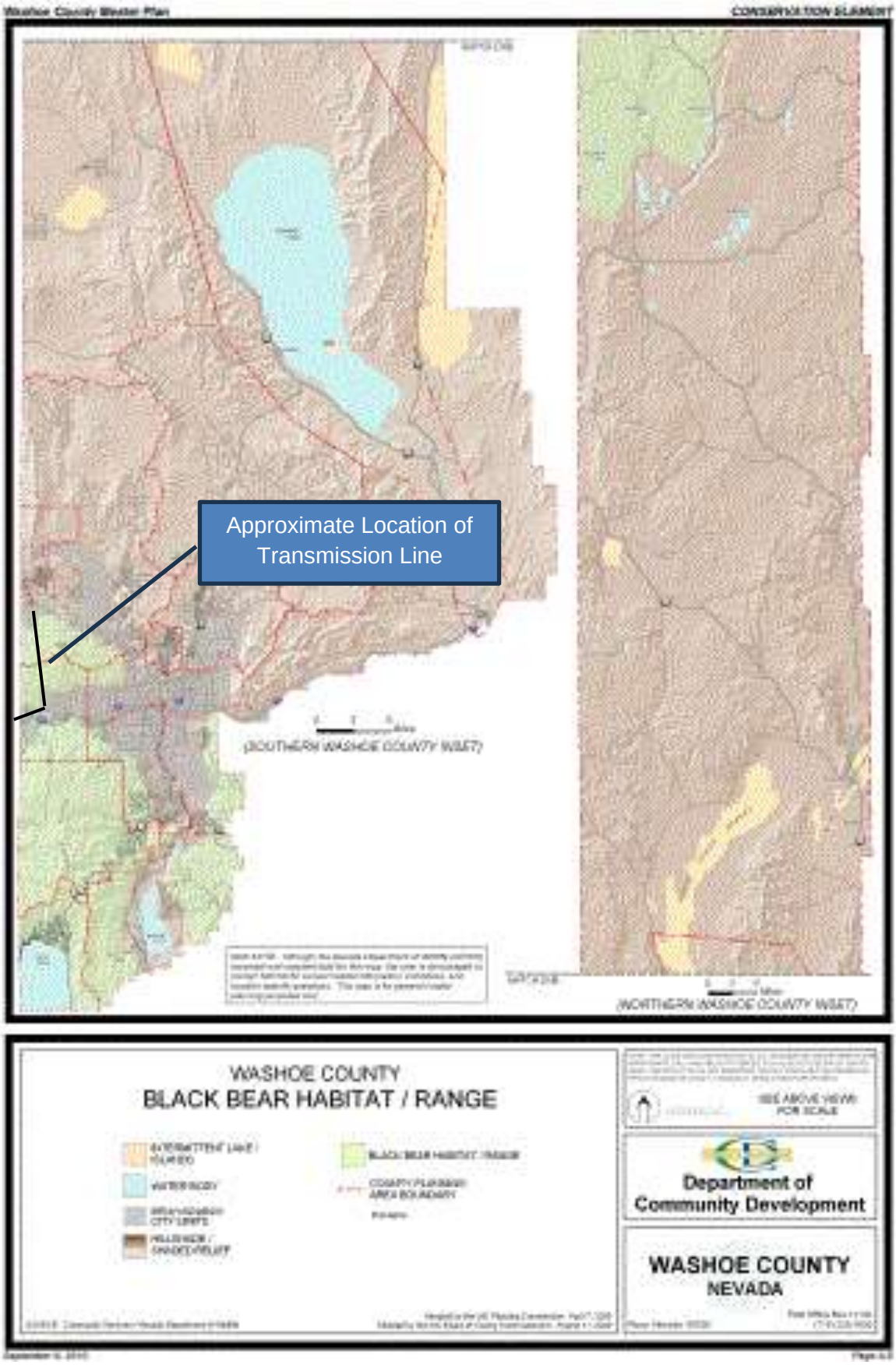
It should be noted that NDOW also reviewed and commented on the Environmental Impact Statement, which is the federal process for review of the project on federal lands and included mitigations in relation to wildlife. The mitigations have been included as conditions in Exhibit A.

Due to the project traversing and impacting wildlife habitats, a Wildlife Protection Plan (Exhibit I) was prepared by Stantec Consulting Services, Inc. The Wildlife Protection Plan sets forth mitigations for general practices, sensitive wildlife species, migratory bird species, raptors, mule deer, lahotan cutthroat trout, avoidance timeframes, and habitat restoration.

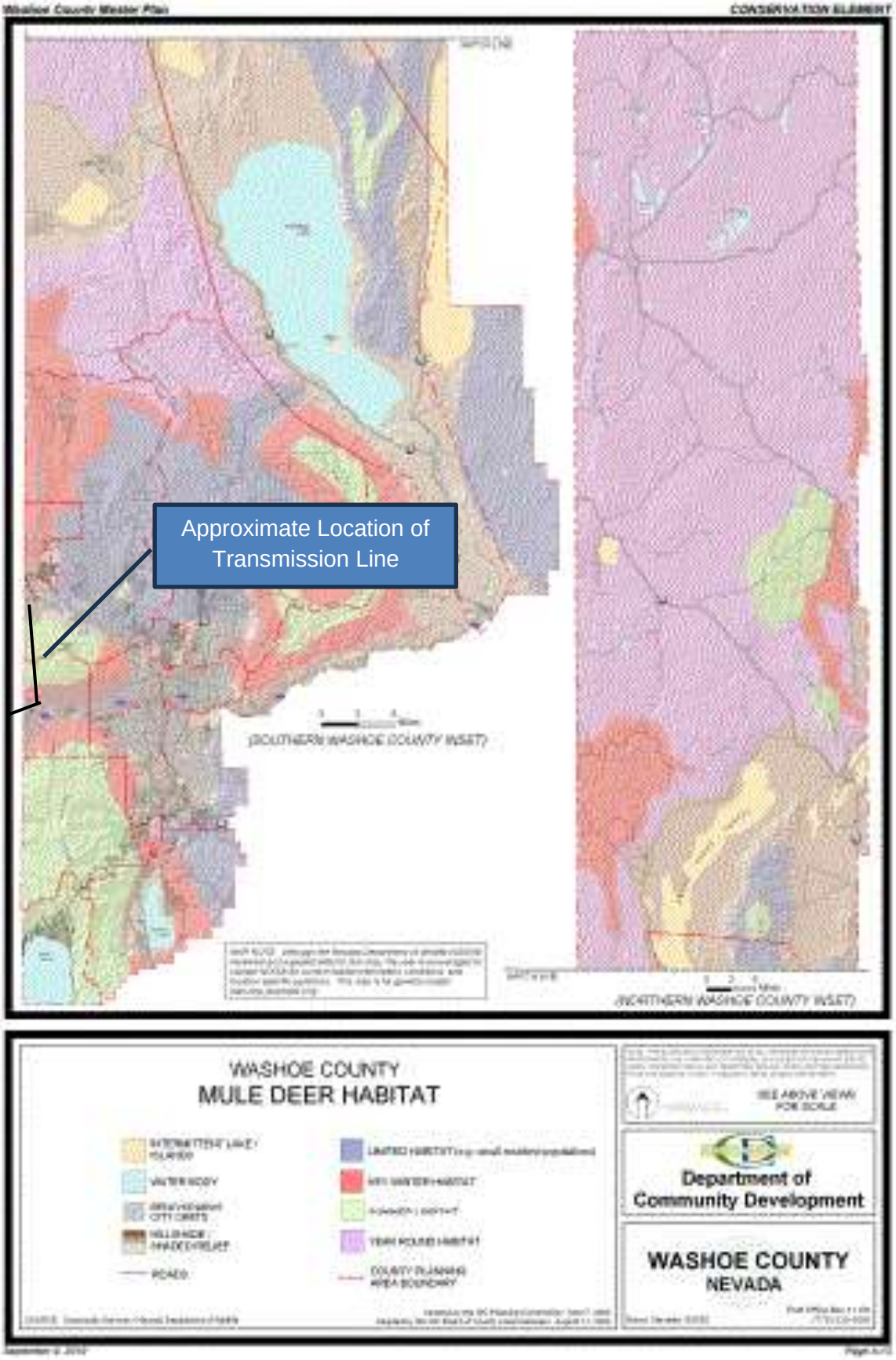
As stated earlier, the line will traverse mule deer habitat. To ensure no impact to mule deer, per the Wildlife Protection Plan, construction will not occur from November 25 through May 25 within areas mapped as crucial winter or winter spring high deer use.

The line will also traverse black bear habitat. The Wildlife Protection Plan does not provide mitigations specifically addressing black bear habitat; however, the general practices mitigations concerning sensitive wildlife species identified during pre-construction surveys or during construction activities to halt work in the general area of the identified species until a qualified biologist is consulted to determine an appropriate buffer and other protective measures will serve to address possible impacts to black bears in addition to other wildlife species.

Mitigations similar to those set forth in the Wildlife Protection Plan to protect wildlife species and their habitat throughout the entire project area are being recommended as conditions of approval in Exhibit A.



Black Bear Habitat Map



Mule Deer Habitat Map

Truckee Meadows Regional Planning Agency (TMRPA)

The applicant is requesting to amend the TMPRA Regional Utility Corridor Map. An amendment to Map 3 – Regional Utility Corridors and Sites in the 2019 Truckee Meadows Regional Plan – Utility Corridor Map will be requested of the Regional Planning Commission if the proposed transmission line is approved by the Planning Commission. The applicant is requesting the proposed location for the following reasons:

- Provide reliable bulk transmission capacity to west Reno consistent with North American Electric Reliability Corporation (NERC) Standard TPL-002-0.

The proposed transmission line location was reviewed by cooperating agencies for environmental review.

Verdi and North Valleys Area Plan Evaluation

The subject parcel is located within the Verdi and North Valleys Planning Areas. The following are the pertinent policies from the Planning Areas from the prior Master Plan in effect in 2023 as the project was submitted under the prior Master Plan:

Verdi Relevant Planning Area Policies Reviewed

Policy	Brief Policy Description	Complies	Condition of Approval
V. 1.4	All development, including buildings, site plans, and civic or public uses shall be constructed consistent with an established green building standard for energy efficiency, renewable content, waste management, and general environmental performance.	Yes	The transmission line will be constructed in conformance with all applicable building codes.
V 5.1	Washoe County should work closely with agencies to preserve and protect the rural atmosphere, wildlife and natural surroundings of the area.	Yes	Stantec Consulting Services, Inc., prepared a Wildlife Protection Plan (Exhibit I), which includes mitigations for avoidance of habitat and reclamation of habitat. The mitigations set forth in the Wildlife Protection Plan are included as conditions of approval in Exhibit A.
V. 11.2	All development, including buildings, site plans, and civic or public uses shall be constructed consistent with an established green building standard for energy efficiency, renewable content, waste management, and general environmental performance.	Yes	The transmission line will be constructed in conformance with all applicable building codes.
V 27.2	Site development plans in the Verdi planning area must submit a plan for the control of noxious weeds. The plan should be developed through consultation with the Washoe County District Health Department, the University of Nevada Cooperative Extension, and/or the Washoe Storey Conservation District. The control plan will be implemented on a voluntary compliance basis.	Yes	Stantec Consulting Services, Inc., prepared a Noxious Weed Abatement Plan (Exhibit H) and was reviewed by the Washoe – Storey Conservation District for conformance.

V 27.12	Proposals for Special Use permits to establish non-residential uses in a residential regulatory zone will be subject to a Public Health Impact Review (PHIR), to be conducted jointly by Community Development staff and Washoe County District Health Department Staff. The specific content and methodology of the PHIR will be determined by the Washoe County District Health Department with the cooperation of the Washoe County Community Development Department, on a case-by-case basis.	Yes	The project information was sent to Northern Nevada Public Health's Division of Environmental Health. Environmental Health provided comment (Exhibit B) stating there were no concerns with the project.
V 27.13	The approval of all Special Use Permits and administrative permits must include a finding that the community character as described in the character statement can be adequately conserved through mitigation of any identified potential negative impacts.	Yes	The proposed transmission line, which will include metal poles, a large portion of the line will be located on rural areas owned by the Forest Service or on rural private parcels, which means there will be little to no impact to community character in the Verdi area. A limited area of the line will be seen in Verdi, a large portion of which already contains an existing transmission line that will be no greater of an impact to aesthetics than the existing transmission line. Therefore, there will be a less-than-significant impact to aesthetics and the community character of Verdi.
V 29.3	Prior to approval of land use intensification within the TMSA, a natural resource management plan should be prepared for the area being intensified. Natural resource management plans should address habitat for mule deer, antelope and sage grouse along with any endangered or threatened species that could be affected by proposed land use changes. Natural resource management plans should include provisions to preserve species habitat, provide migration corridors and/or mitigate impacts to habitat that are related to land use intensification. The natural resource management plans should be developed with review and cooperation from Nevada Department of Wildlife, United States Department of Fish and Game, United States Bureau of Land Management, and United States Forest Service.	Yes	The Environmental Impact Statement (EIS) included mitigations for those habitats of mule deer and other wildlife impacted by the project. Additionally, the project information was sent for review to the Nevada Department of Wildlife and they provided a comment stating they have been working with NV Energy on the project and the mitigations necessary for the impacted habitats. The mitigations set forth in the EIS, which are reflected in the Wildlife Protection Plan (Exhibit I) are included as conditions of approval in Exhibit A.

V. 29.6	Prior to approval of land use intensification within the TMSA, a wildfire protection plan should be prepared for the area being intensified. Wildfire protection plans should include provisions to protect public health and defend property from wildfires.	Yes	Stantec Consulting Services, Inc., prepared a Fire Prevention and Suppression Plan for the project. The Fire Prevention and Suppression Plan is included as Exhibit F. Additionally, NV Energy has created a Wildland Fire Plan which is included as Exhibit G.

North Valleys Relevant Area Plan Policies Reviewed

Policy	Brief Policy Description	Complies	Condition of Approval
NV.9.1	With the exception of temporary infrastructure for construction projects, Washoe County will require the underground placement of utility distribution infrastructure within the North Valleys Management Area. Utility transmission facilities will be subject to a special use permit. In considering whether to grant a special use permit, or in consideration of any conditions, including underground placement, which may be placed upon an approval, the Planning Commission will utilize the best available information, including but not limited to the most recent Regional Utility Corridor Report, and any Environmental Impact Statement or other study undertaken regarding the proposal.	Yes	Per an excerpt provided by the project consultant, CFA, Inc., the Final Environmental Impact Statement (EIS), the United States Forest Service stated the undergrounding of the transmission line was dismissed from further consideration because it requires far more ground disturbance than overhead construction, is 7 to 10 times the cost of overhead construction, is slower and more difficult to repair, and is not technically practical to bury transmission lines for long distance in very steep terrain. Therefore, undergrounding, based on the information contained within the Final EIS, is not a viable option.
NV. 12.3	The granting of special use permits in the North Valleys must be accompanied by a finding that no significant degradation of air quality will occur as a result of the permit. As necessary, conditions may be placed on special use permits to ensure no significant degradation of air quality will occur. The Department of Community Development will seek the advice and input of the Air Quality Division of the Department of Health in the implementation of this policy.	Yes	The project information was sent to Washoe County Air Quality for review and no response was received. Additionally, mitigations to control air quality for issues such as fugitive dust caused by vehicles on dirt roads are included in the Construction, Operations, and Maintenance Plan for the project which is included in Exhibit E.

NV. 14.1	Prior to the approval of master plan amendments, tentative maps, special use permits, or public initiated capital improvements in the North Valleys planning area, the Nevada Department of Wildlife will be contacted and given an opportunity to provide conservation, preservation, or other wildlife and habitat management input to the project.	Yes	The project information was sent to the Nevada Department of Wildlife (NDOW) for review. Comment (Exhibit B) was provided stating that NDOW had been coordinating with NV Energy on the wildlife mitigation measures and there were no additional comments on the project.
NV. 14.2	Washoe County Staff will remain cognizant of the interest of local Native American groups in wildlife and habitat issues. Staff will seek input from the Reno-Sparks Indian Colony when a proposed project, through its proximity or other connection to Native lands, has the potential to impact the interests of the agencies in this regard.	Yes	Project information was sent to the Pyramid Lake Paiute Tribe, Reno/Sparks Indian Colony, Washoe Tribe of NV. No responses were received from the tribes.

Reviewing Agencies

The following agencies/individuals received a copy of the project application for review and evaluation.

Agencies	Sent to Review	Responded	Provided Conditions	Contact
Natural Resources Conservation Service	X			
BLM - NV State Office	X	X		
BLM - Winnemucca Dist. Office	X			
Environmental Protection	X			
NDOT (Transportation)	X			
NDOW (Wildlife)	X	X		
Washoe County Building & Safety	X			
Washoe County Parks & Open Space	X	X	X	Faye-Marie Pekar, fpekar@washoecounty.gov
Washoe County Water Rights Manager (All Apps)	X	X		
WCSO Law Enforcement	X			
Washoe County Engineering (Land Development) (All Apps)	X	X	X	Rob Wimer, rwimer@washoecounty.gov; Janelle Thomas, jkthomas@washoecounty.gov
Washoe County Engineering & Capital Projects Director (All Apps)	X			
WCHD Air Quality	X			
WCHD Environmental Health	X	X	X	Jim English, jenglish@washoecounty.gov; Wes Rubio, wrubio@washoecounty.gov; David Kelly, dakelly@washoecounty.gov
Reno Fire	X			
TMFPD	X	X	X	Dale Way, dway@tmfpd.us; Brittany Lemon, BLemon@tmfpd.us
Truckee Meadows Regional Planning	X	X		
Washoe-Storey Conservation District	X	X	X	Jim Shaffer, shafferjam51@gmail.com
Nevada State Historic Preservation	X			
Pyramid Lake Paiute Tribe	X			
Reno/Sparks Indian Colony	X			
Washoe Tribe of NV	X			
City of Reno	X			

Additionally, the project information was sent to the United States Forest Service – Humboldt Toiyabe National Forest on September 18, 2023, and March 14, 2024, for review and no response was received.

The Washoe County Sheriff's Office also provided comment which is included in Exhibit B.

All conditions required by the contacted agencies can be found in Exhibit A, Conditions of Approval.

Neighborhood Meeting

A neighborhood meeting was noticed and held at 6:00 PM on August 30, 2023, as a virtual meeting via Zoom. A total of eleven (11) members of the public attended the meeting. The common concerns from the public and the responses from the applicant's consultant, CFA, Inc., were as follows:

- Public Concern: Location of proposed line.

  Consultant Response: A presentation was given by CFA, Inc., detailing the approximate route and location to residential subdivisions.

- Public Concern: Removal of poles – will there be an increase or decrease in the number of structures?

  Consultant Response: There will be a net removal of eleven (11) poles.

- Public Concern: Possibility of undergrounding the transmission line to address aesthetics and wildfire dangers.

  Consultant Response: Undergrounding the transmission line requires a disturbance of larger areas of land and the increased costs will be passed to the rate-payers.

- Public Concern: What will the structures look like (e.g., metal, wood) and what will their height be?

  Consultant Response: The support structures will be metal poles with a height of seventy (70) feet in certain locations.

  Staff Comment: It should be noted that the maximum height of the support structures will be one hundred and five (105) feet under the proposal submitted.

- Public Concern: Will there be aeronautical impacts (e.g., lights, required markers)?

  Consultant Response: There are no aeronautical impacts foreseen at this time.

Public Comment

As shown in Exhibit D, proper noticing occurred for the project. A total of five (5) public comments (Exhibit J) were received concerning the project, all of which were inquiries requesting additional information on the project. Planning staff provided the project information links on the County website or additional information obtained from the applicant, satisfying all requests for additional information.

Staff Comment on Required Findings

WCC Section 110.810.30, Article 810, *Special Use Permits*, requires that all of the following findings be made to the satisfaction of the Washoe County Planning Commission before granting approval of the request. Staff has completed an analysis of the special use permit application and has determined that the proposal is in compliance with the required findings as follows.

(a) Consistency. That the proposed use is consistent with the action programs, policies, standards and maps of the Master Plan and the Verdi, North Valleys, and Cold Springs Area Plans.

Staff Comment: The proposed use is consistent with the action programs, policies standards and maps of the Master Plan and the Verdi, North Valleys, and Cold Springs Planning Areas as outlined above and conditioned in Exhibit A.

(b) Improvements. That adequate utilities, roadway improvements, sanitation, water supply, drainage, and other necessary facilities have been provided, the proposed improvements are properly related to existing and proposed roadways, and an

adequate public facilities determination has been made in accordance with Division Seven.

Staff Comment: The proposed transmission line has been reviewed by Washoe County Engineering, which provided Conditions of Approval, and the Washoe County Water Rights Manager had no comments. No reviewing agency indicated concerns with infrastructure or improvements for this transmission line.

(c) Site Suitability. That the site is physically suitable for the utility services use and for the intensity of such a development.

Staff Comment: An Environmental Impact Statement (EIS) was prepared for the project and the proposed route has been thoroughly analyzed and approved through the federal EIS process and a final Record of Decision (ROD) has been issued. The extensive federal analysis process considered the site access, existing site conditions, topography, environmental, visual, public safety and fire prevention and response, and other considerations. Four alternative routes/actions were considered by the Forest Service and it was determined that the Peavine/Poeville route was best.

(d) Issuance Not Detrimental. That issuance of the permit will not be significantly detrimental to the public health, safety or welfare; injurious to the property or improvements of adjacent properties; or detrimental to the character of the surrounding area.

Staff Comment: The applicant indicates that the transmission line will increase reliability of service for residents and businesses. Staff has provided conditions of approval to mitigate impacts of the proposed use on public health, safety, and welfare.

(e) Effect on a Military Installation. Issuance of the permit will not have a detrimental effect on the location, purpose or mission of the military installation.

Staff Comment: There are no military installations within the noticing area of the proposed facility.

Finding required by Verdi Area Plan for a special use permit:

(a) As required by Verdi Area Plan Policy V 27.13, the community character as described in the Character Statement of the Verdi Area Plan will be adequately conserved through mitigation of any identified potential negative impacts.

Staff Comment: The proposed transmission line, which will include metal poles, a large portion of the line will be located on rural areas owned by the Forest Service or on rural private parcels, which means there will be little to no impact to community character in the Verdi area. A limited area of the line will be seen in Verdi, a large portion of which already contains an existing transmission line that will be no greater of an impact to aesthetics than the existing transmission line. Therefore, there will be a less-than-significant impact to aesthetics and the community character of Verdi.

Finding required by North Valleys Area Plan for a special use permit:

(a) As required by North Valleys Area Plan Policy SV 12.3, no significant degradation of air quality will occur as a result of the granting of the special use permit.

Staff Comment: While significant ground disturbance will occur, the mitigations for air quality will be implemented by NV Energy as set forth in the Construction, Operation, and Maintenance Plan (Exhibit E) which will ensure no significant degradation of air quality. Additionally, the project information was sent to the Washoe County Air Quality Division and no response was received concerning the project.

Recommendation

After a thorough analysis and review, Special Use Permit Case Number WSUP23-0032 is being recommended for approval with conditions. Staff offers the following motion for the Commission's consideration.

Motion

I move that, after giving reasoned consideration to the information contained in the staff report and information received during the public hearing, the Washoe County Planning Commission approve with conditions Special Use Permit Case Number WSUP23-0032 for NV Energy for the construction of 6.8 miles of a 120kV transmission line within unincorporated Washoe County, with the conditions included as Exhibit A to this matter, having made all five findings in accordance with Washoe County Code Section 110.810.30. I further move to vary the development code standard in Table 110.406.05.1 to allow structures up to 105 feet in height, waive the parking standards of Article 410, waive the landscaping standards of Article 412, and the 3:1 slope standard of Article 438 of the Washoe County Development Code.

(a) Consistency. That the proposed use is consistent with the action programs, policies, standards and maps of the Master Plan and the Verdi, North Valleys, and Cold Springs Area Plans;

(b) Improvements. That adequate utilities, roadway improvements, sanitation, water supply, drainage, and other necessary facilities have been provided, the proposed improvements are properly related to existing and proposed roadways, and an adequate public facilities determination has been made in accordance with Division Seven;

(c) Site Suitability. That the site is physically suitable for the utility services use and for the intensity of such a development;

(d) Issuance Not Detrimental. That issuance of the permit will not be significantly detrimental to the public health, safety or welfare; injurious to the property or improvements of adjacent properties; or detrimental to the character of the surrounding area;

(e) Effect on a Military Installation. Issuance of the permit will not have a detrimental effect on the location, purpose or mission of the military installation.

Finding required by Verdi Area Plan for a special use permit:

(a) As required by Verdi Area Plan Policy V 27.13, the community character as described in the Character Statement of the Verdi Area Plan will be adequately conserved through mitigation of any identified potential negative impacts.

Finding required by North Valleys Area Plan for a special use permit:

(b) As required by North Valleys Area Plan Policy SV 12.3, no significant degradation of air quality will occur as a result of the granting of the special use permit.

Appeal Process

Planning Commission action will be effective 10 calendar days after the written decision is filed with the Secretary to the Planning Commission and mailed to the applicant, unless the action is appealed to the Washoe County Board of County Commissioners, in which case the outcome of the appeal shall be determined by the Washoe County Board of County Commissioners. Any appeal must be filed in writing with the Planning and Building Division within 10 calendar days from the date the written decision is filed with the Secretary to the Planning Commission and mailed to the applicant.

Conditions of Approval

Special Use Permit Case Number WSUP23-0032

The project approved under Special Use Permit Case Number WSUP23-0032 shall be carried out in accordance with the conditions of approval granted by the Planning Commission on May 7, 2024. Conditions of approval are requirements placed on a permit or development by each reviewing agency. These conditions of approval may require submittal of documents, applications, fees, inspections, amendments to plans, and more. These conditions do not relieve the applicant of the obligation to obtain any other approvals and licenses from relevant authorities required under any other act.

Unless otherwise specified, all conditions related to the approval of this special use permit shall be met or financial assurance must be provided to satisfy the conditions of approval prior to issuance of a grading or building permit. The agency responsible for determining compliance with a specific condition shall determine whether the condition must be fully completed or whether the applicant shall be offered the option of providing financial assurance. All agreements, easements, or other documentation required by these conditions shall have a copy filed with the County Engineer and the Planning and Building Division.

Compliance with the conditions of approval related to this special use permit is the responsibility of the applicant, his/her successor in interest, and all owners, assignees, and occupants of the property and their successors in interest. Failure to comply with any of the conditions imposed in the approval of the special use permit may result in the institution of revocation procedures.

Washoe County reserves the right to review and revise the conditions of approval related to this Special Use Permit should it be determined that a subsequent license or permit issued by Washoe County violates the intent of this approval.

For the purpose of conditions imposed by Washoe County, “may” is permissive and “shall” or “must” is mandatory.

Conditions of approval are usually complied with at different stages of the proposed project. Those stages are typically:

- Prior to permit issuance (i.e., grading permits, building permits, etc.).
- Prior to obtaining a final inspection and/or a certificate of occupancy.
- Prior to the issuance of a business license or other permits/licenses.
- Some “ conditions of approval” are referred to as “operational conditions.” These conditions must be continually complied with for the life of the project or business.

The Washoe County Commission oversees many of the reviewing agencies/departments with the exception of the following agencies.

- **The DISTRICT BOARD OF HEALTH, through Northern Nevada Public Health, has jurisdiction over all public health matters in the Health District. Any conditions set by the Health District must be appealed to the District Board of Health.**

FOLLOWING ARE CONDITIONS OF APPROVAL REQUIRED BY THE REVIEWING AGENCIES. EACH CONDITION MUST BE MET TO THE SATISFACTION OF THE ISSUING AGENCY.

Washoe County Planning and Building Division

1. The following conditions are requirements of Planning and Building, which shall be responsible for determining compliance with these conditions.

   Contact Name – Tim Evans, Planner, 775.328.2314, TEvans@washoecounty.gov

   a. The applicant shall attach a copy of the action order approving this project to all permits and applications (including building permits) applied for as part of this special use permit.

   b. The applicant shall include a condition response memorandum with each subsequent permit application. That memorandum shall list each condition of approval, shall provide a narrative describing how each condition has been complied with, and the location of the information showing compliance with each condition within the improvement plan set that has been submitted.

   c. The applicant shall demonstrate substantial conformance to the plans approved as part of this special use permit.

   d. The applicant shall submit construction plans, with all information necessary for comprehensive review by Washoe County, and initial building permits shall be issued within two years from the date of approval by Washoe County. The applicant shall complete construction within the time specified by the building permits.

   e. A note shall be placed on all construction drawings and grading plans stating:

      NOTE

      Should any cairn or grave of a Native American be discovered during site development, work shall temporarily be halted at the specific site and the Sheriff's Office as well as the State Historic Preservation Office of the Department of Conservation and Natural Resources shall be immediately notified per NRS 383.170.

   d. Construction activities shall be limited to the hours between 7am to 7pm, Monday through Saturday only. Any construction machinery activity or any noise associated with the construction activity are also limited to these hours.

The following conditions are requirements of Washoe County Planning and Nevada Department of Wildlife (NDOW), which shall be responsible for determining compliance with these conditions.

Contact Name – Tim Evans, Planner, Washoe County Planning 775.328.2314, TEvans@washoecounty.gov; Katie Andrle, Western Region Supervising Habitat Biologist, Nevada Department of Wildlife, 775.688.1145, kmandrle@ndow.org

e. All environmentally sensitive areas (i.e., culturally sensitive areas, meadows, and special status plant populations) will be temporarily fenced during construction for avoidance.

f. Prior to construction, all construction personnel shall be instructed on the protection of sensitive biological and cultural resources that have the potential to occur on-site by qualified personnel.

g. Signs, flagging, or other readily visible markings shall be used to indicate the presence of guy wires to reduce the potential for people and wildlife to run into the wires.

h. Excavations deep enough to potentially entrap wildlife species shall be covered and fenced at night or when unattended to prevent livestock or wildlife from falling in. All covers shall be secured in place and strong enough to prevent breakage by wildlife.

i. There shall be no new access roads or widening of existing roads for construction access through meadows. This measure will protect potential habitat for special status plant populations that are found in wetland and meadow habitats, such as Dog Valley ivesia (Ivesia aperta var. canina).

j. If any sensitive wildlife or plant species are identified during pre-construction surveys or during construction activities, work in the general area of the identified species will be halted until a qualified biologist is consulted to determine an appropriate buffer and other protective measures. The USFS and Washoe County shall be notified within 24 hours of the discovery of the species. Buffer distance will be established in consultation with the USFS on a case by case basis depending on species and type and magnitude of construction activity. If avoidance is infeasible, consultation with the USFS and Washoe County, and at its discretion, any cooperating agencies will be contacted prior to continuing work in the immediate area of the species. The same process will be implemented in the event that any federal- or state-listed species are discovered on public land, with the discovery being reported to the USFS or BLM, and Washoe County, depending on the respective land administration.

k. If appropriate, additional surveys for northern goshawk and flammulated owl or other sensitive species will be conducted prior to construction by a qualified biologist approved by the USFS. Coordination with the USFS will be conducted prior to commencing surveys to determine appropriate survey methodology, timing, and survey area. If nesting is detected, the USFS and Washoe County will be contacted within 24 hours and Forest Plan standard and guidelines (USFS 2004) will be implemented. A designated Protected Activity Center (PAC) will be delineated around the nest site. Within the PAC no construction activities may occur during the “Limited Operating Period” April 15th-September 30th. Pole construction will need to be designed to span the PAC.

l. To reduce potential disturbance to migratory birds, construction shall occur outside the typical avian breeding season (April 1 to July 31). If construction activities cannot be avoided during this time period, surveys shall be conducted immediately prior to construction to locate active nesting areas.

m. If active avian nests are located on NFS land or BLM-administered public land, they shall be flagged and avoided until after the breeding period. NV Energy shall coordinate with the USFS or BLM biologist to determine appropriate time frames for resuming construction.

n. Placement of the ROW shall avoid wherever possible, isolated groups of trees and/or groups of trees with an average diameter of dominant and co-dominant trees greater than 24 inches at breast height (dbh) as directed/approved by the USFS Silvilculturist.

o. To protect raptors such as hawks and eagles from electrocution, transmission line and pole structures shall be constructed in conformance with the guidelines contained in Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006, prepared by the Avian Power Line Interaction Committee (APLIC) (2006).

p. To avoid impacts to wintering mule deer, construction shall not occur from November 25 through May 25 within areas mapped as crucial winter or winter-spring high deer use,

including the Mitchell Canyon Deer Management Area. Non-ground disturbing activities, such as surveying, staking, or resource driven activities (e.g., cultural surveys, biological surveys), may occur within this time frame.

This Design Feature will not apply to work within fenced and cleared areas associated with the existing California and Bordertown substations, including the Bordertown Substation expansion area that needs to be cleared and fenced prior to the Limited Operating Period (LOP) of November 25 through May 25, as long as the initial clearing of vegetation occurs outside the LOP. Once the vegetation is cleared and the Bordertown Substation expansion area is fenced, construction of the actual facility will no longer be bound to the LOP restriction.

q. To limit the potential for impacts to aquatic resources, particularly to Lahontan cutthroat trout, pole sites or roads shall not be placed within the 100-year floodplain in Dog Creek, Bull Ranch Creek, and the Truckee River. During construction, no soil disturbing activities shall occur within the 100-year floodplain of these streams.

r. Successfully restored areas shall be defined as:

> Reference sites will be pre-established and approved by the USFS. Reference sites will include plant communities that are representative of the ecological site and must include plant communities that are in a late-seral and ecologically functioning condition. Appropriate reference sites will be determined by collecting baseline cover data to indicate plant succession and community structure.

In addition, to encourage the rapid recovery of vegetation communities that benefit species such as mule deer, NV Energy shall only cut brush species at ground level to preserve root systems allowing for re-growth.

s. Where removal of vegetation other than trees is unavoidable, the vegetation shall be cut at ground level to preserve the root structure and allow for potential sprouting.

t. To aid in providing browse for wintering mule deer, post construction revegetation in areas mapped as crucial winter and winter spring high use habitat shall include a seed mix of brush species preferred by mule deer (i.e., bitterbrush, mountain big sagebrush, mountain mahogany, serviceberry (Amelanchier spp.), snowberry, and Wyoming big sage) as well as appropriate forbs and grasses.

u. To ensure that impacts to wildlife habitat, particularly mule deer are a less-than-significant impact, vegetation that would be permanently lost or temporarily disturbed from the Project, would require creation of or improvement of on or offsite wildlife habitat. To achieve this, NV Energy shall fund a habitat restoration account that includes the cost of restoring three acres to every one acre of habitat that is permanently or temporarily disturbed. The account will be administered by NDOW or a Sierra Front Wildlife Working Group that would include NDOW, Washoe County, USFS, BLM, City of Reno and other interested participants.

Washoe County Engineering and Capital Projects

2. The following conditions are requirements of the Engineering Division, which shall be responsible for determining compliance with these conditions.

   Contact Name – Robert Wimer, Professional Engineer, 775.328.2059, RWimer@washoecounty.gov

   a. A complete set of construction improvement drawings, including an on-site grading plan, shall be submitted when applying for a building/grading permit. Grading shall comply with

best management practices (BMP's) and shall include detailed plans for grading, site drainage, erosion control (including BMP locations and installation details), slope stabilization, and mosquito abatement. Placement or removal of any excavated materials shall be indicated on the grading plan. Silts shall be controlled on-site and not allowed onto adjacent property.

b. The applicant shall demonstrate that there is legal and physical access for construction and maintenance of the transmission line.

c. The applicant shall be allowed to construct slopes steeper than 3:1 on the uphill side of the project roadways (2:1, 1:1, and 2' max height vertical cut slopes) within the 30-foot grading corridor granted by the United States Forest Service (USFS) permit. The constructed slopes shall be restored following completion of the construction as required by the USFS and through the Final Environmental Impact Statement. Road conditions shall be monitored during construction and if accessibility becomes compromised due to weather or sloughing, debris shall be cleared. The contractor shall post appropriate temporary signage during construction at access points to the temporary roads to inform the public that the temporary roads are not maintained. All grading shall be reviewed and approved by the County Engineer.

Truckee Meadows Fire Protection District

3. The following condition is a requirement of the Truckee Meadows Fire Protection District, which shall be responsible for determining compliance with this condition.

   Contact Name – Brittany Lemon, Fire Captain, 775.326.6079, blemon@tmfpd.us

   a. This project shall meet and comply with all requirements of currently adopted TMFPD fire codes, ordinances, and standards at the time of construction to include infrastructure for fire apparatus access roads and water supply. https://tmfpd.us/fire-code/

   b. A vegetation management plan in accordance with the adopted Wildland Urban Interface Code (WUI) Appendix B is required for this project.

   c. Any blasting or hot works will require a permit issued by TMFPD.

Washoe County Regional Parks and Open Space

4. The following conditions are requirements of the Regional Parks and Open Space, which shall be responsible for determining compliance with these conditions.

   Contact Name – Faye-Marie Pekar, Park Planner, FPekar@washoecounty.gov

   a. Should any earthen materials need be imported to the site, they shall be "certified weed free" to prevent the spread of noxious and invasive weeds.

   b. All undeveloped areas disturbed as a result of project activities shall be revegetated utilizing a native seed mix as reviewed and approved by the Washoe Storey Conservation District and/or Washoe County Regional Parks and Open Space.

Northern Nevada Public Health (NNPH), Air Quality Management Division (AQMD)

5. The following conditions are requirements of Northern Nevada Public Health, Air Quality Management Division, which shall be responsible for determining compliance with these conditions.

   Contact Name – Genine Rosa, Senior Air Quality Specialist, 775.784.7204, GRosa@nnph.org

a. Any dust generating activity, regardless of size of disturbance, will be subject to the Washoe County District Board of Health Regulation Governing the Air Quality Management Division, 040.030 Dust Control. Except when engaged in commercial agricultural operations, no person may disturb the topsoil by removing, altering, or overlaying the ground cover through scraping, burning, excavating, storing of fill, application of palliative, or any other method on any real property unless reasonable precautions are taken to prevent generation of dust during both the active development phases and thereafter if the property is to remain unoccupied, unused, vacant or undeveloped.

b. If disturbance will be greater than 1 acre then a Dust Control Permit will be required prior to breaking ground, failure to do so may result in enforcement action resulting in a Notice of Violation with associated fines. For Dust Control Permit questions call AQMD at 775-784-7200 or visit www.OurCleanAir.com.

*** End of Conditions ***

From: Roman, Brandon
To: Evans, Timothy
Subject: FW: [EXTERNAL] September Agency Review Memo I
Date: Friday, September 15, 2023 2:01:00 PM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png

Agency response to NV Energy Transmission Line.

From: NVSO_Web_Mail, BLM_NV <BLM_NV_NVSO_Web_Mail@blm.gov>
Sent: Friday, September 15, 2023 12:55 PM
To: Roman, Brandon <BRoman@washoecounty.gov>
Subject: Re: [EXTERNAL] September Agency Review Memo I

[**NOTICE:** This message originated outside of Washoe County -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Thanks for your email. The area between Verdi and Bordertown is managed by the Humboldt-Toiyabe National Forest. They would be the appropriate Federal land management agency to consult for this project.

From: Roman, Brandon <BRoman@washoecounty.gov>
Sent: Friday, September 15, 2023 10:55 AM
To: NVSO_Web_Mail, BLM_NV <BLM_NV_NVSO_Web_Mail@blm.gov>
Subject: [EXTERNAL] September Agency Review Memo I

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good morning,

Please remember to send agency review responses/comments directly to the Planner for the case, rather than replying to me.

Please find the attached **Agency Review Memo I** with cases received in **September** by Washoe County Community Services Department, Planning and Building Division. You've been asked to review the application for **Item #4** The item description and link to the application are provided in the memo. **Comments are due by September 28, 2023.**

Sincerely,

Evans, Timothy

From: Lemon, Brittany
Sent: Tuesday, September 19, 2023 11:19 AM
To: Evans, Timothy
Cc: Way, Dale
Subject: WSUP23-0032 (NV Energy Transmission Line) Conditions of Approval

Hi Tim,

"This project shall meet and comply with all requirements of currently adopted TMFPD fire codes, ordinances, and standards at the time of construction to include infrastructure for fire apparatus access roads and water supply." https://tmfpd.us/fire-code/.

A vegetation management plan in accordance with the adopted Wildland Urban Interface Code (WUI) Appendix B is required for this project. \

Any blasting or hot works will require a permit issued by TMFPD.

Thank you,

Brittany Lemon
Fire Captain - Fire Prevention | Truckee Meadows Fire & Rescue
blemon@tmfpd.us | Office: 775.326.6079 | Cell: 775.379.0584
3663 Barron Way, Reno, NV 89511

"Committed to excellence, service, and the protection of life and property in our community"

WSUP23-0032
EXHIBIT B

Washoe-Storey Conservation District

Bret Tyler Chairmen
Jim Shaffer Treasurer
Cathy Canfield Storey app
Jean Herman Washoe app

1365 Corpotate Blvd.
RenoNV 89502
775 857-8500 ext. 131
nevadaconservation.com

September 21, 2023

Washoe County Community Services Department

C/O Tim Evans, Planner

1001 E Ninth Street, Bldg. A

Reno, NV 89512

R: WSUP23-0032 NV Energy Transmission Line

Dear Tim,

In reviewing the special use permit to construct and maintain a new 10.8-mile overhead transmission line, the Conservation District has the following comments.

The applicant states that trees within twenty-one feet and trees within right of way (ROW) will be removed. Of the 10.8 miles of transmission line 7.8 miles cross private land. The District recommends that tree removal be replaced on a one-to one ratio on private property.

The District supports the seed mix (pg. 316) as proposed by the US Forest Service (USFS).

The applicant states several times in the application that noxious weeds will be mapped and treated prior to and following construction and weed treatment will continue until disturbed areas are successfully restored and continue during maintenance activities. The applicant further states treatment of noxious and invasive weeds for 3–5-year period (pg.560). We recommend a longer period of 5 years.

Thank you for providing us with the opportunity to review the project and if there are any questions call us on (775) 750-8272.

Sincerely,

Jim Shaffer

WASHOE COUNTY
COMMUNITY SERVICES DEPARTMENT
Regional Parks and Open Space

1001 EAST 9TH STREET
RENO, NEVADA 89520-0027
PHONE (775) 328-3600
FAX (775) 328.3699

TO: **Tim Evans, Planner**

FROM: **Faye-Marie Pekar, Park Planner**

DATE: **April 11, 2024**

SUBJECT: **Special Use Permit Case Number WSUP23-0032 (NV Energy Transmission Line)**

I have reviewed the application for case number WSUP23-0032 on behalf of the Washoe County Regional Parks and Open Space Program (Parks Program) and prepared the following comments:

If approved, this special use permit would allow a major public facility use type by NV Energy to construct, operate, and maintain a new 10.8 mile long, 120kV overhead transmission line connecting the California substation near Verdi to the Bordertown substation. The project will entail 53,000 cubic yards of excavation (cut) and access road widening and the applicant is requesting to waive all landscaping and parking requirements and to vary the maximum height of the applicable regulatory zones to allow for pole heights as high as 105'. This project meets the standard for a Project of Regional Significance because it entails construction of a transmission line that carries 60 kV or more.

Given these considerations, the Parks Program requires the following conditions of approval:

1. Should any earthen materials need be imported to the site, they shall be "certified weed free" to prevent the spread of noxious and invasive weeds.

2. All undeveloped areas disturbed as a result of project activities shall be revegetated utilizing a native seed mix as reviewed and approved by the Washoe Storey Conservation District and/or Washoe County Regional Parks and Open Space.

From: Roman, Brandon
To: Evans, Timothy
Subject: FW: March Agency Review Memo I
Date: Friday, March 15, 2024 10:35:02 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png

From: Katie Andrle <kmandrle@ndow.org>
Sent: Friday, March 15, 2024 8:47 AM
To: Roman, Brandon <BRoman@washoecounty.gov>
Subject: RE: March Agency Review Memo I

[**NOTICE:** This message originated outside of Washoe County -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Hi Brandon,
For item 1, NDOW has been coordinating with NV Energy on the project on minimization and mitigation measures. We do not have any additional comments on this project.

Thanks!

From: Roman, Brandon <BRoman@washoecounty.gov>
Sent: Thursday, March 14, 2024 2:43 PM
Subject: FW: March Agency Review Memo I

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Here is the Memo with the links.

Good afternoon,

Please remember to send agency review responses/comments directly to the Planner for the case, rather than replying to me.

Please find the attached **Agency Review Memo I** with cases received in **March** by Washoe County Community Services Department, Planning and Building Division. You've been asked to review the application for **Item #1**. The item description and link to the application are provided in the memo. **Comments are due by March 28, 2024.**

Sincerely,

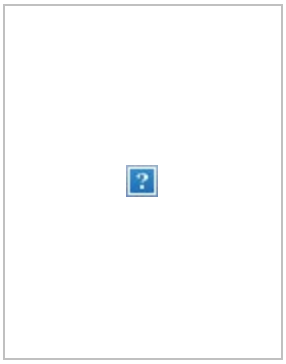
From: Zirkle, Brandon
To: Evans, Timothy
Subject: RE: March Agency Review Memo I
Date: Friday, March 15, 2024 5:47:12 PM
Attachments: image006.jpg
image007.png
image008.png
image009.png
image010.png
image011.png

Tim,

I don't see anything in the NV Energy plan that would have a significant impact on the Sheriff's Office. I am not sure if that would fall into a significant infrastructure that would require a private security plan to the site?

Thanks,

Captain Brandon Zirkle
Washoe County Sheriff's Office
Valley Patrol Command
Office (775) 328-3354
Cell (775) 232-9477



From: Roman, Brandon <BRoman@washoecounty.gov>
Sent: Thursday, March 14, 2024 2:43 PM
To: Huntley, Scott <SHuntley@washoecounty.gov>; Pekar, Faye-Marie L. <FPekar@washoecounty.gov>; Fink, Mitchell <MFink@washoecounty.gov>; Wimer, Robert <RWimer@washoecounty.gov>; Thomas, Janelle K. <JKThomas@washoecounty.gov>; Zirkle, Brandon <BZirkle@washoecounty.gov>; Reede, Michon <MReede@washoecounty.gov>; Smith, Dwayne E. <DESmith@washoecounty.gov>; Hein, Stephen <SHein@washoecounty.gov>; Rosa, Genine <GRosa@nnph.org>; Restori, Joshua <JRestori@nnph.org>; English, James <JEnglish@nnph.org>; Rubio, Wesley S <WRubio@nnph.org>; Kelly, David A <DAKelly@nnph.org>
Cc: Gustafson, Jennifer <jgustafson@da.washoecounty.gov>; EHS Plan Review <EHSPlanReview@nnph.org>; Mullin, Kelly D. <KMullin@washoecounty.gov>; Lloyd, Trevor <TLloyd@washoecounty.gov>; Albarran, Adriana <AAlbarran@washoecounty.gov>; Emerson, Kathy

From:	**Rosa, Genine**
To:	**Evans, Timothy**
Subject:	**Case Number WSUP23-0032 (Nevada Energy Transmission Line)**
Date:	**Friday, March 22, 2024 8:12:00 AM**
Attachments:	**image001.png** **image002.png** **image003.png** **image004.png** **image005.png** **image006.png**

Comments from AQM:

Any dust generating activity, regardless of size of disturbance, will be subject to the Washoe County District Board of Health Regulation Governing the Air Quality Management Division, 040.030 Dust Control. Except when engaged in commercial agricultural operations, no person may disturb the topsoil by removing, altering, or overlaying the ground cover through scraping, burning, excavating, storing of fill, application of palliative, or any other method on any real property unless reasonable precautions are taken to prevent generation of dust during both the active development phases and thereafter if the property is to remain unoccupied, unused, vacant or undeveloped.

If disturbance will be greater than 1 acre then a Dust Control Permit will be required prior to breaking ground, failure to do so may result in enforcement action resulting in a Notice of Violation with associated fines. For Dust Control Permit questions call AQMD at 775-784-7200 or visit www.OurCleanAir.com.

Genine Rosa *(she/her)*
Senior Air Quality Specialist
Air Quality Management Division

O: 775-784-7204
1001 E Ninth St. Bldg. B Reno, NV 89512

NNPH.org

click here

Date: March 28, 2024

To: Tim Evans, Planner

From: Janelle K. Thomas, P.E., C.F.M., Senior Licensed Engineer
Robert Wimer, P.E., Licensed Engineer

Re: Special Use Permit for ***NV Energy Transmission Line WSUP23-0032***
APN 046-080-40; 046-060-45 & 47; 046-131-24; 046-132-06; 046-133-15 & 17; 046-180-12, 14 & 15; 154-011-07; 156-040-09, 10, 14 &15; 156-111-23; 156-141-04

GENERAL PROJECT DISCUSSION

Washoe County Engineering staff has reviewed the above referenced application. The Special Use Permit is to approve a special use permit for a major public facility use type by NV Energy to construct, operate, and maintain a new 10.8-mile long (11.9-miles including California and Nevada portions), 120 kV overhead transmission line connecting the California substation near Verdi to the Bordertown substation. The project will entail 53,000 cubic yards of excavation (cut) for access road widening and the applicant is requesting to waive all landscaping and parking requirements and to vary the maximum height of the applicable regulatory zones to allow for pole heights as high as 105'. This project meets the standard for a Project of Regional Significance because it entails construction of a transmission line that carries 60 kV or more. It will require approval by the regional planning authorities before approval at the County level would take effect. This project also requires amendments to the Regional Utility Corridor Map to identify the location of the new transmission line. The amendments must be sponsored by the Board of County Commissioners and approved by the Truckee Meadows Regional Planning Authorities. This project will need to comply with all Federal and State approvals before any approval at the County level would take effect. The parcel numbers include the following: 046-080-40; 046-060-45 & 47; 046-131-24; 046-132-06; 046-133-15 & 17; 046-180-12, 14 & 15; 154-011-07; 156-040-09, 10, 14 &15; 156-111-23; 156-141-04. The Engineering and Capital Projects Division recommends approval with the following comments and conditions of approval which supplement applicable County Code and are based upon our review of the site and the application prepared by CFA, Inc. The County Engineer shall determine compliance with the following conditions of approval.

For questions related to sections below, please contact the staff's name referenced.

GENERAL CONDITIONS
Contact Information: Robert Wimer, P.E. (775) 328-2059

Conditions:

1. A complete set of construction improvement drawings, including an on-site grading plan, shall be submitted when applying for a building/grading permit. Grading shall comply with best management practices (BMP's) and shall include detailed plans for grading, site drainage, erosion control (including BMP locations and installation details), slope

stabilization, and mosquito abatement. Placement or removal of any excavated materials shall be indicated on the grading plan. Silts shall be controlled on-site and not allowed onto adjacent property.

2. The applicant shall demonstrate that there is legal and physical access for construction and maintenance of the transmission line.

DRAINAGE (COUNTY CODE 110.416, 110.420, and 110.421)
Contact Information: Robert Wimer, P.E. (775) 328-2059

Conditions:

1. No drainage related comments or conditions.

TRAFFIC AND ROADWAY (COUNTY CODE 110.436)
Contact Information: Mitchell Fink, P.E. (775) 328-2050

Conditions:

1. No Traffic and Roadway related comments or conditions.

UTILITIES (County Code 422 & Sewer Ordinance)

Contact Information: Alexander Mayorga, P.E. (775) 328-2313

Conditions:

1. No Utilities related comments or conditions.

Date: March 27, 2024

To: Tim Evans, Planner

From: Timber Weiss, P.E., Licensed Engineer

Re: Special Use Permit Case Number WSUP23-0032 (Nevada Energy Transmission Line)

GENERAL PROJECT DISCUSSION

For hearing, discussion, and
possible action to approve a special use permit for a major public facility use type by NV Energy to construct, operate, and maintain a new 10.8-mile long (11.9-miles including California and Nevada portions), 120 kV overhead transmission line connecting the California substation near Verdi to the Bordertown substation. The project will entail 53,000 cubic yards of excavation (cut) for access road widening and the applicant is requesting to waive all landscaping and parking requirements and to vary the maximum height of the applicable regulatory zones to allow for pole heights as high as 105'. This project meets the standard for a Project of Regional Significance because it entails construction of a transmission line that carries 60 kV or more. It will require approval by the regional planning authorities before any approval at the County level would take effect. This project also requires amendments to the Regional Utility Corridor Map to identify the location of the new transmission line. The amendments must be sponsored by the Board of County Commissioners and approved by the Truckee Meadows Regional Agency Planning Authorities. This project will need to comply with all Federal and State approvals before any approval at the County level would take effect.

The Community Services Department (CSD) recommends approval of this project with the following Water Rights conditions:

No water rights conditions for this permit.

NORTHERN NEVADA Public Health | Environmental Health

March 27, 2024

Washoe County Community Services
Planning and Development Division

RE: Nevada Energy Transmission Line; Multiple APN's
Special Use Permit; WSUP23-0032

Dear Washoe County Staff:

The following conditions are requirements of Northern Nevada Public Health (NNPH), Environmental Health Division, (EHS) which shall be responsible for determining compliance with these conditions.

Contact Name – James English - jenglish@washoecounty.us

a) Condition #1: EHS has reviewed the application as submitted and has no concerns with the approval of the application as submitted.

If you have any questions or would like clarification regarding the foregoing, please contact James English, EHS Supervisor at jenglish@washoecounty.us regarding all NNPH comments.

Sincerely,

James English, REHS, CP-FS
EHS Supervisor
Environmental Health Services
Northern Nevada Public Health

TRUCKEE MEADOWS REGIONAL PLANNING AGENCY

INITIAL REVIEW MEMORANDUM

TO: Nathan Gilbert, City of Reno
Tim Evans, Washoe County

FROM: Chris Tolley, TMRPA

DATE: April 1, 2024

SUBJECT: REVISED – TMRPA initial review of the City of Reno case LDC24-00015 and Washoe County case WSUP23-0032 (NV Energy Utility Corridor)

This memorandum provides the Truckee Meadows Regional Planning Agency's (TMRPA) initial review comments regarding the subject case (comprised of LDC24-00015 and WSUP23-0032), as stated in the 2019 Truckee Meadows Regional Plan (Policy *RC 5*). The subject energy utility corridor/transmission line crosses both the City of Reno and Washoe County's jurisdictional boundaries, and is required to be reviewed by both jurisdictions, in addition to the regional process mentioned in this memorandum.

The following constitutes an initial review based on the limited information available at the time of this memorandum. TMRPA recognizes that the proposal may change through the jurisdictional review of the case. Should the case be approved through the City of Reno and Washoe County, the proposal will need to be formally submitted to TMRPA for a review of conformance with the 2019 Truckee Meadows Regional Plan in its entirety.

This memorandum has been REVISED (a second time), as the proposed utility corridor has shifted slightly from the original proposal. The previous version of this memorandum (sent on February 20, 2024) reflected an update to the processing procedures (shown below) to indicate that TMRPA will conduct the sponsorship portion on behalf of both jurisdictions.

Pursuant to Policy *PF 11 – Regional Utility Corridor and Sites Regional Plan Amendment Requirements*, this case will require an amendment to **Map 3 – Regional Utility Corridors and Sites** of the 2019 Truckee Meadows Regional Plan to include a new regional utility corridor (according to the submittal materials: an approximately 10.8-mile long, 120 kV overhead transmission line). Additionally, in order to amend Map 3, TMRPA will schedule an item, in conjunction with the submitted requests for conformance review, to consider sponsorship of the proposed regional utility corridor on behalf of both jurisdictions.

The request, as described in the materials provided by the City of Reno and Washoe County, is the following:

> City of Reno: A request has been made for a conditional use permit for a major utility to allow for the construction of **a new overhead 120kV electrical power line**. The corridor alignment for the

utility is generally located between the Bordertown substation (Cold Springs area) to the north and the California substation (Verdi area) to the south. Approximately four miles of the overall ±10.8-mile Nevada portion of the power line are within the City of Reno with the reminder in unincorporated Washoe County.

Washoe County: A special use permit for a major public facility use type by NV Energy to construct, operate, and maintain a new **10.8-mile long (11.9-miles including California and Nevada portions), 120 kV overhead transmission line connecting the California substation near Verdi to the Bordertown substation**. The project will entail 53,000 cubic yards of excavation (cut) for access road widening and the applicant is requesting to waive all landscaping and parking requirements and to vary the maximum height of the applicable regulatory zones to allow for pole heights as high as 105'.

[TMRPA notes: **bolded text** identifies the portion of the request that is subject to review under the Regional Plan]

Potential conformance issues

TMRPA has not identified any potential conformance issues at this time; however, please provide adequate justification for establishing the transmission line outside of existing regional utility corridors (see the paragraph below for the applicable policies). A discussion of the Regional Plan policies and proposed justification should be incorporated into the Washoe County analysis for the subject case.

Policy *PF 13 – Preference for Use of Existing Regional Utility Corridors* requires local government master plans to require the placement of new electrical transmission infrastructure in existing regional utility corridors, unless adequate justification can be provided as to why the new infrastructure cannot be placed in an existing corridor. Additionally, Policy *PF 14 – Priority Hierarchy for Placement of New Transmission Infrastructure* requires local government master plans use the listed priority hierarchy when considering the establishment of new transmission infrastructure. This policy identifies the priorities for locating new transmission infrastructure. Given these priorities, please provide adequate justification for the new section(s) of regional utility corridor(s) that will be necessary as part of this proposal.

Regional Plan policies for consideration in the analysis

RF 11 – Compatibility Factors

PF 11 – Regional Utility Corridor and Sites Regional Plan Amendment Requirements

PF 12 – Regional Utility Corridor Width and Setbacks

PF 14 – Priority Hierarchy for Placement of New Transmission Infrastructure

PF 18 – Regional Renewable Energy Generation

NR 2 – Resilient Region

NR 7 – Wildlife Habitat

NR 14 – Sustainable Development

NR 15 – Cultural Resources

RC 9 – Conformance Review Findings

RC 10 – Regional Plan Amendment Findings

Data and information related to Regional Plan implementation

Regional Land Designation: Tier 2, Tier 3 and Rural Area

Development Constraints Area (generally, not applicable to a utility): natural slopes over 30%, publicly owned-open space and deed restricted lands

Request for comment from other local government and/or affected entities

None at this time

Other information for review

None at this time

TMRPA Staff Notes

TMRPA addressed the notes in this section, and they were removed for the previously revised memorandum.

Please do not hesitate to contact TMRPA staff at 775-321-8385 if you have any questions or comments on this initial review memorandum. For more information, you can access the 2019 Truckee Meadows Regional Plan and the Regional Data Viewer at www.tmrpa.org.

Project Name: NV Energy 1104 Line

Meeting Location: Zoom Meeting

Meeting Date: August 30, 2023 at 6:00 pm to 7:00 pm

Neighborhood Meeting Sign-In Sheet

	First and Last Name (please print legibly)	Address	Email (or) Phone
1	Meeting conducted by Zoom - Please see uploaded registrant and participant list for further details		
2			
3			
4			
5			
6			
7			
8			

Disclaimer: A copy of this sign-in sheet will be submitted to Washoe County Planning Division along with the project application.

Project Name: NV Energy 1104 Line

Neighborhood Meeting Comment Card

Name: _____

Company/Organization (if applicable): _____

Address: _____

Comment:

Meeting Conducted by Zoom - No comment cards in this format were received. Please see chat text from Zoom and emailed questions, concerns and issues (provided with this file) as well the audio recording of the meeting, all uploaded to the Washoe County Neighborhood Meeting HUB for this project.

Project Name: NV Energy 1104 Line

Neighborhood Meeting Comment Card

Name: _____

Company/Organization (if applicable): _____

Address: _____

Comment:

Project Name: NV Energy 1104 Line

Meeting Location: Zoom Meeting

Meeting Date: August 30, 2023 at 6:00 pm to 7:00 pm

Neighborhood Meeting
SUMMARY

Virtual Meeting Option Provided: (●) **YES** ( ) **NO**

Hosted By (Name): Dave Snelgrove, AICP **(Company):** CFA, INC.

Contact (Email): dsnelgrove@cfareno.com **(Phone):** 775.856.7073

Public Concerns:

1. Location of proposed line
2. Removal of poles - increase or decrease number of structures
3. Possibility of undergrounding line, due to aesthetics (views) and fire dangers
4. What structures will look like? Metal or wood? Height?
5. Aeronautical impacts - lights, other required markers

~~**Changes Made to Proposal (if applicable):**~~ **Responses/Project Info to Public Concerns.**

1. Approximate route was detailed during presentation, and its relative location to residential subdivisions
2. Net removal of 11 poles
3. Disturbance of larger areas of land, increased costs passed along to rate-payers
4. Metal poles, upwards of 70 feet tall in certain locations
5. No aeronautical impacts foreseen at this time

Any Additional Comments:

WSUP23-0032
EXHIBIT C

Emailed questions from residents, prior to Neighborhood meeting

Following is a copy of the email text messages that have been received over the past 5 days, after the postcards were delivered to residents. A summary of the comment is provided before each copied message. We can discuss appropriate answers to these question tomorrow (Tuesday) when we meet.

Received 8/26
Issues expressed - Addresses number of lines that will be in an existing corridor (I think)
Minimum clearance distance changes that may impact their property.

Hello

I recently received a postcard regarding the NV Energy Line 1104 project and I have some questions. First would this project be adding 120kV to the current line or replacing the current line? Second, how would this line affect the minimal clearance distance for building? We own a parcel of land along these transmission lines and the line already greatly affects our allowable building area. If this new line affects it more, it will eliminate our ability to build our home. Please advise what might happen.

Thank you for any and all information you have.

Jessica Yurtinus

Received 8/25
Issues Expressed - where does the line head north, near the West Meadows subdivision?
What will the addition of the 120 kV line look like?
Is the line needed specifically to serve a new project in the area?
Reason for O/H v. U/G?

Hi Dave,

I have a few questions regarding the proposed NV Energy Line 1104.

I was just reviewing the parcel list from the provided mailer and cross referencing with the Washoe county mapping system and I'm not following the path of the line around the north end of West Meadows neighborhood. Specifically when does the line head north, and on what parcel?

Can you describe to me (or provide a photo) what an additional 120 V of power line will look like? Currently there are large lines on the north side of the West Meadows Community and I'm curious of the additional visual impact.

Is this power demand a result of the Stan Lucas' Mortensen Ranch development?

Finally, can you speak to the reason for the choice to use overhead powerlines vs underground. I suspect it has to do with cost, but I don't want to infer.

Thank you,

Ruth

Ruth Ebens | Patagonia Inc.
ruth.ebens@patagonia.com
Pronouns: she/her/hers
775.997.3451 | cell

Received 8/25

Issues expressed – High fire danger and why not go underground because of this. Issue with his Experiences with NV Energy maintenance in the past.
Path close to Verdi ES.
Visual impact and home values being reduced.

I live in the West Meadows subdivision in Verdi. I have some major concerns regarding the proposed project, "Line 1104". I would like to see this addressed at the upcoming Neighborhood Meeting on August 30, 2023.

1) Given the high fire danger in this area from long periods of heat and regular high winds, why are you not planning to take Line 1104 underground?
There are hundreds of homes in the hills around Verdi and hundreds more scheduled to be built. I have seen firsthand the devastation wind-powerline fires can cause; in Sonoma County California thousands of homes were lost because of this. These lines need to go underground.

2) NVE line powerline maintenance does not seem to be the best. I have reported unconnected stay-lines on wood power poles behind my house during high winds. They have never been fixed. On windy days these lines flap around like kites. (Picture of power pole attached.) These power poles are in line with the proposed project "Line 1104", per the information that I have seen. A) Will proposed Line 1104 replace this group of damaged wood power poles?, B) Will Line 1104 be an additional line?, C) What assurances does the neighborhood have that Line 1104 will be better care for than the current lines?

3) It seems that the proposed path of the overhead lines of 1104 is very close to Verdi Elementary school. Do high voltage lines, being close to a school (that will be growing) present a danger?

4) With the addition of Line 1104, the Verdi Valley close to the Truckee River will look like a spaghetti bowl of wires and poles. This will result in home values being reduced. My home has a view of the proposed project.
With addition of Line 1104, can other lines be removed, thus cleaning up the overall look of the area?

Thank you for the notice of this proposed project. Once again it greatly concerns me.

Thomas Silewicz

Received 8/24
Issues Expressed - **Wants copy of FEIS and ROD**
Fire dangers
Escape route if fire breaks out.

Dear David

Thanks for your prompt response.

I would like more information such as a detailed map showing the construction roads as shown on page 13 of the attached document.

Also i would like to read the USFS final ROD and EIS documents.

The concern that I and other residents in West Reno-Somersett PUD and Verdi is all about wildfire danger. Since this project planning began in 2011 and was reviewed at a Washoe County Community Advisory Board in 2018, we have all learned more about transmission line failures during high wind causing terrible damage in areas such as Greenville California, Paradise California, and Carson City/Tahoe.

Did the ROD and EIS address wildfire dangers and the option to underground the transmission line?

You likely know that a large population increase in Verdi/West Reno/Somersett is underway through the recent District Court order involving the Mortensen Garson Overlay District [MGOD]. Recently the court ordered a 640 home project whose PUD will be intersected by the proposed transmission line. There are other developments underway in this area that has a high fire risk with only one southern evacuation route into I-80. You may know that about six high kV lines on poles cross I-80 at Mogul. If these lines should fail and close the road while current or the proposed Bordertown-Poeville line in our area cause a wildfire, our population will be stranded.

On Aug 23, 2023, at 5:42 PM, David Snelgrove < dsnelgrove@cfareno.com> wrote:

Warren:

Attached is the transmission line route map that we have uploaded to the Washoe County Neighborhood Meeting HUB site. It is not incredibly detailed but should give a general idea of location.

I hope this helps. Please feel free to reach out to me if you have any other questions.

Thank you.

LAND SURVEYORS
CIVIL ENGINEERS
LAND USE PLANNERS
EST. 1981

A DBE/MBE/SBE Certified Company

David Snelgrove, A.I.C.P. | Planning Manager
CFA, Inc. | Direct: (775) 856-7073 | Email: dsnelgrove@cfareno.com
1150 Corporate Blvd. | Reno, Nevada 89502

From: WARREN LYONS <warrenlyons@verizon.net>
Sent: Wednesday, August 23, 2023 5:35 PM
To: David Snelgrove <dsnelgrove@cfareno.com>
Cc: Warren Lyons <warrenlyons@verizon.net>
Subject: Nv energy line 1104

REceived the email notice. The links to a meeting do not provide a map showing the route for the line

Please send me a map showing the proposed line

Warren Lyons
warrenlyons@verizon.net
215-787-7922
9052 Cabin Creek Trail
Reno NV 89523

Received 8/24
Issues expressed – Doesn't like powerline project due to limited mapping information
Wildfire concern.

I strongly object to the line as currently plotted on the map provided. In part due to the lack of existing monuments/roadway markers and property lines. Secondly overhead lines have been the primary cause of wildfires. These lines should be buried underground and brought in the most direct way to Interstate 80. They should not transverse the community of Verdi which has burned a number of times in its history.
As proposed I think you put the community of over 2000 people at extreme risk.
--
Philip F Povey

Received 8/25 –
Issues Expressed - Will Additional poles and lines be added?

Mr. Snelgrove,

We received a Notice of Neighborhood Meeting to review the proposed 120kV overhead power transmission line proposed between Bordertown Substation and Verdi Substation. Does this include adding, or upgrading a line? Does it include installing new poles or using existing infrastructure? We are unable to access the website for project information so please advise what this entails.

We look forward to hearing from you.

Thank you,

Sally and Ken Oliver
370 River Pines Dr.
Verdi, NV 89439

Received 8/23 –

Issues Expressed - **Couldn't figure out the route or impact to his property.**
I sent him the FEIS and ROD for a greater definition of the line location.
He wants to know what impact this will have on his property. Any graphics could help.

Dave,

Im not sure we've spoken since when I did The Eddy, but good to re-initiate conversations.

I am reaching out because got a notice in the mail that there will be a 120 KVA power line improvement project between the aforementioned locations, which is a deceiving description because in searching the APNs listed it will be going thru my backyard. The APNs are all over the place and dont make a ton of sense as presented, but it is clear that the power lines may be adding to/replacing the current lines running adjacent to my residence at 038-280-45.

I'm trying to keep my wife at bay, and as a developer avoid the immediate NIMBY response, so I was hoping you could send me some more detailed info prior to the Neighborhood meeting on 8/30/23.

If we need to have a call to add context, please feel free to reach out.

Please and Thank You.

Kurt Stitser, LEED AP
Chief Operating Officer
(775) 737-3301

18:03:21 From Adrian Argyris To Everyone:
I have people contacting me saying they can not get into the meeting
18:03:57 From Warren Lyons To Everyone:
The cost benefit analysis of undergrounding the proposed transmission line as noted in the EIS and USFS Record of Decision, and in statements made to prior Washoe County community advisory boards, concluded that undergrounding is 7 to 10 times the cost of overheading.

This analysis is missing the issue of wild fire risk caused by transmission line failures. With over 8000 homes at c. $500 per home equals 4 billion. We need to revisit the option to underground.
18:04:00 From Kurt Stitser To Everyone:
have them use the Meeting ID and Passcode rather than trying to type in the hyperlink
18:10:31 From Kurt Stitser To Everyone:
Once the proposed power line connects into existing transmission corridors near both Bordertown and Verdi, will the new line(s) be suspended from the same power pole structures, or will new power poles need to be installed/replaced?
18:15:08 From Casey Coffman To Everyone:
Will this project affect easement corridors in the Verdi Lake Estates neighborhood?
18:20:20 From Warren Lyons To Everyone:
Verdi-Somersett is in ward 5
18:20:46 From Kurt Gensheimer To Everyone:
Can you please provide a link to the USFS record of decision here in the chat? Thanks.
18:22:49 From Warren Lyons To Everyone:
Please address the option for under grounding to reduce risk
18:23:31 From Kenny Brown To Everyone:
https://www.fs.usda.gov/project/?project=36656&exp=overview
18:23:47 From D Kerr To Everyone:
What home development is near 15 & 16
18:30:38 From Kenny Brown To Dave Snelgrove(Privately):
Kelle George has her hand raised
18:35:37 From Casey Coffman To Everyone:
how do the dimensions of the new Verdi poles compare to the existing ones
18:39:18 From Casey Coffman To Everyone:
once again can you tell us about the height and width of the new poles
18:51:41 From Warren Lyons To Everyone:
Could we get a photo of #16 the triple turn tower
18:55:14 From Ruth Ebens To Everyone:
In this day and age, do we not think to the environment (fire potential) and future and run lines under ground?
18:55:45 From Adrian Argyris To Everyone:
Thank you -

Collated chat and zoom meeting questions

Kurt Stitser

Once the proposed power line connects into existing transmission corridors near both Bordertown and Verdi, will the new line(s) be suspended from the same power pole structures, or will new power poles need to be installed/replaced?

Voltage of new lines? Similar to existing?

Casey Coffman

Will this project affect easement corridors in the Verdi Lake Estates neighborhood? Reduce? Enlarge?

How do the dimensions of the new Verdi poles compare to the existing ones?

Once again can you tell us about the height and width of the new poles. Any sounds associated with lines?

Warren Lyons

Please address the option for under grounding to reduce risk

Could we get a photo of #16 the triple turn tower

D. Kerr

What home development is near 15 & 16

Are lines 17 - 20 near any home developments?

How close are lines 17-20 to the Stan Lucas project? Will it impact the Cliffs?

Adrian Argyrsis

Lives on Hill Lane. Line materials. Triple coated line?

Kellie George

Airplane lights, markers?

Different routes? How was route determined? Road alignments determined?

Sally Oliver

Will structures be removed?

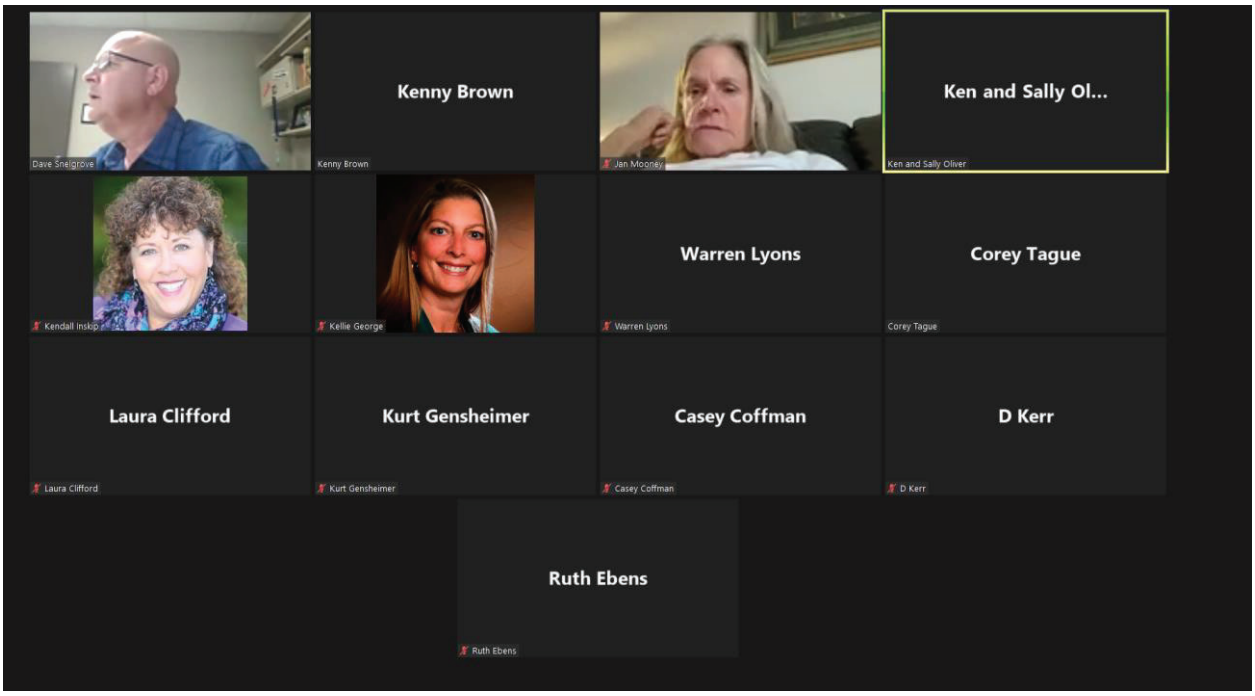
How tall will structures be? How will affect views?

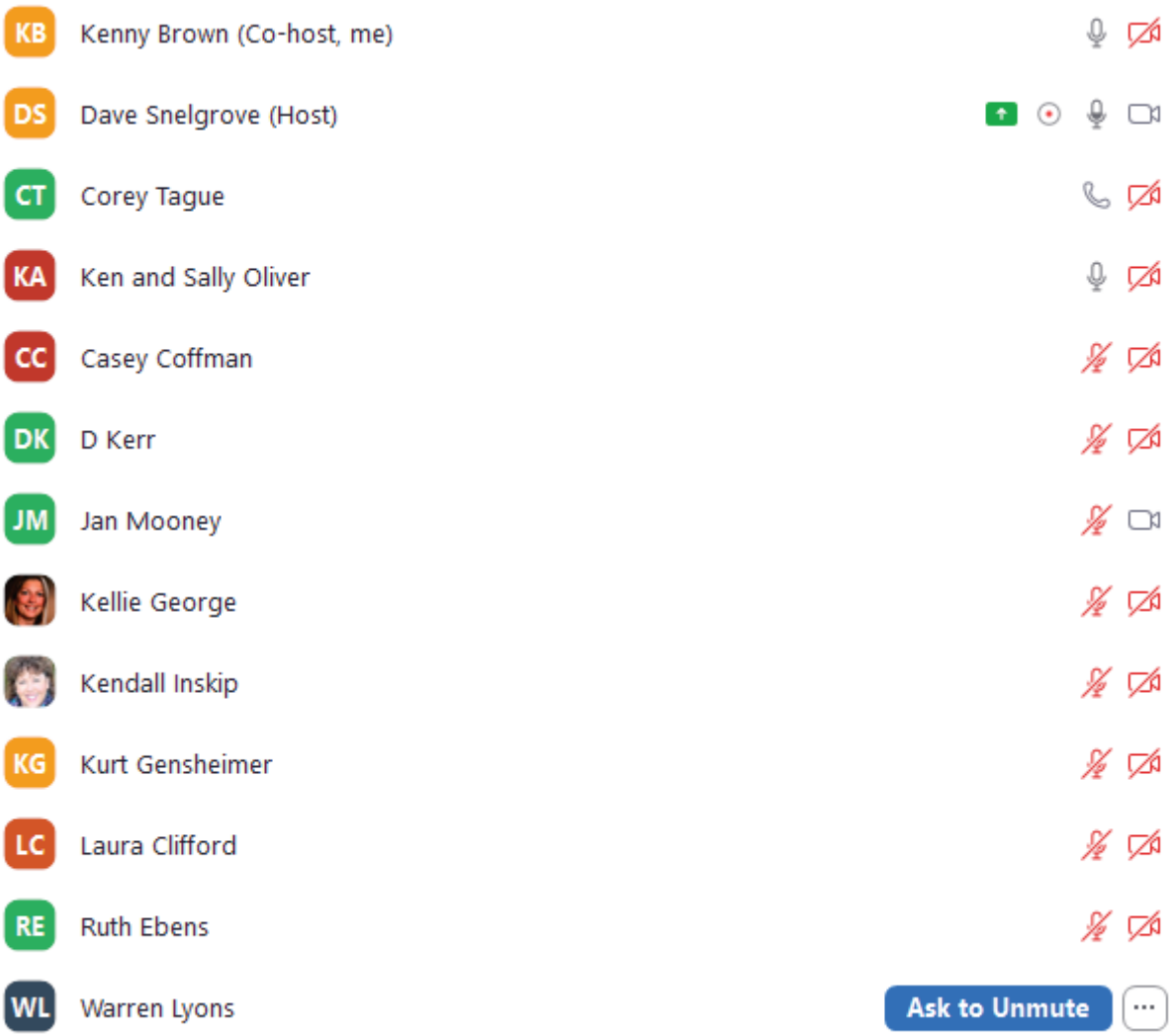
Jan Mooney

Pole on property line. Dark Brown, metal, tall.

Kendall Inskip

Access property through an ATV track. Widening of the dirt road. Timeframe for road widening in the back country and will they be able to use it.

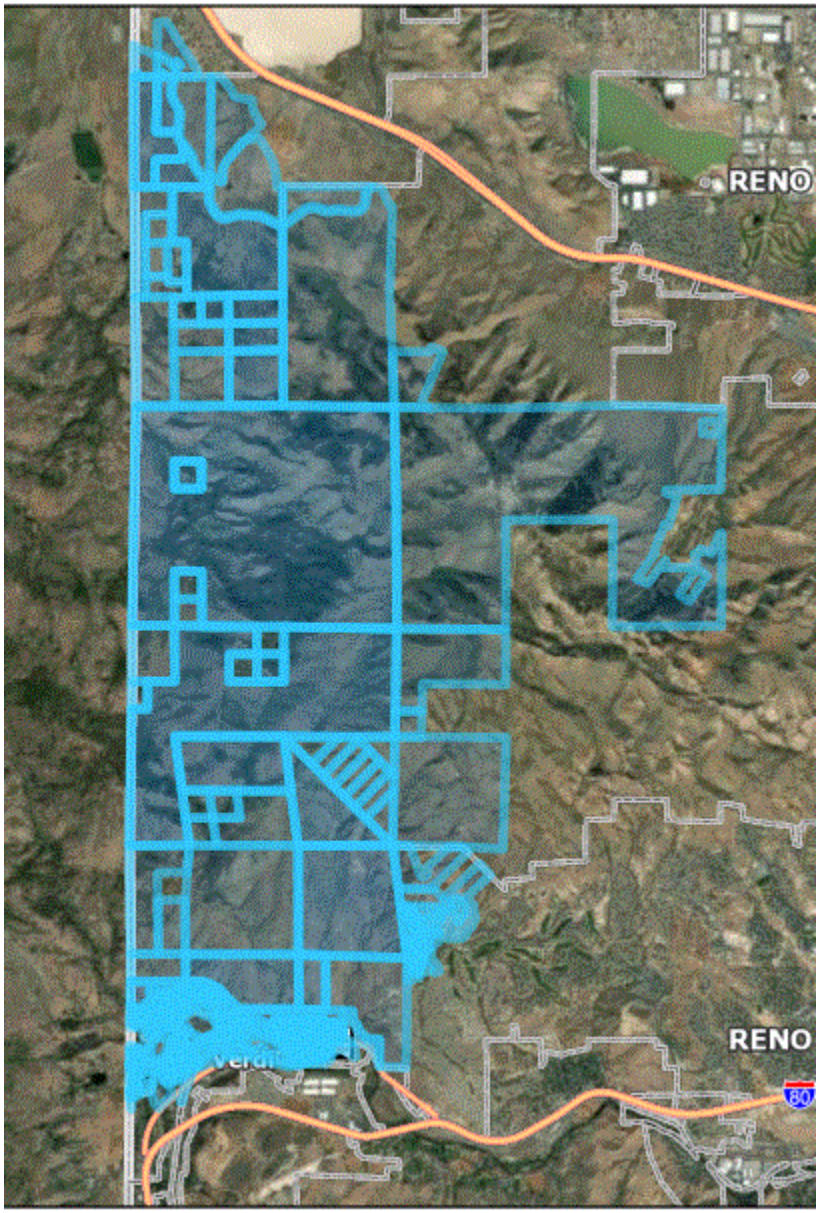

Dave Snelgrove
Kenny Brown
Kenny Brown
Jan Mooney
Ken and Sally Ol...
Ken and Sally Oliver
Kendall Inskip
Kellie George
Warren Lyons
Warren Lyons
Corey Tague
Corey Tague
Laura Clifford
Laura Clifford
Kurt Gensheimer
Kurt Gensheimer
Casey Coffman
Casey Coffman
D Kerr
D Kerr
Ruth Ebens
Ruth Ebens



WSUP23-0032
EXHIBIT C

Public Notice

Washoe County Code requires that public notification for a special use permit must be mailed to a minimum of 30 separate property owners within a minimum 750-foot radius of the subject property a minimum of 10 days prior to the public hearing date. A notice setting forth the time, place, purpose of hearing, a description of the request and the land involved was sent within a 750-foot radius of the subject property. Over thirty (30) separate property owners were noticed a minimum of 10 days prior to the public hearing date.



Public Notice Map

Special Use Permit Case Number WSUP23-0032

EXHIBIT E LINK

The technical reports submitted with the project application are extensive. To review the complete Exhibit E with technical reports on-line click *here* or click on the Exhibit E link located underneath this Staff Report on the May 7, 2024 meeting page.

Fire Prevention and Suppression Plan
Bordertown to California 120 kV Transmission Line
Construction, Operation, and Maintenance (COM) Plan

Prepared for:

NV Energy
6100 Neil Road
Reno, Nevada 89511

Prepared by:

Stantec Consulting Services Inc.
6995 Sierra Center Parkway
Reno, Nevada 89511

August 2020

Table of Contents

List of Tables

LIST OF ABBREVIATIONS

BLM	Bureau of Land Management
CAL FIRE	California Department of Forestry and Fire Protection
COM	Construction, Operations, and Maintenance
CFR	Code of Federal Regulations
FMO	Fire Management Officer
kV	Kilovolt
Plan	Fire Prevention and Suppression Plan
Project	Bordertown to California 120 Kilovolt Transmission Line Project
ROW	Right-of-Way
U.S.	United States
USFS	United States Forest Service

1.0 INTRODUCTION

NV Energy and its contractors will construct the Bordertown to California 120 Kilovolt (kV) Transmission Line Project (Project) in compliance with all federal, state, and local regulations as well as the National Environmental Policy Act, the Environmental Impact Statement and Final Record of Decision, the United States (U.S.) Forest Service (USFS) Special Use Permit, and all other applicable permits. The Project area is in Washoe County, Nevada, and Sierra County, California, west and northwest of the city of Reno, Nevada. The northern boundary of the Project area is near Bordertown, Nevada, and U.S. Highway 395 and the southern boundary is near Interstate 80 between Verdi, Nevada, and Mogul, Nevada. The western boundary is roughly parallel with the California state line and the eastern boundary extends to the Peavine area generally east of Peavine Peak. The constructed 120 kV overhead transmission line will be approximately 11.9 miles long and will run between the existing Bordertown and California substations in Sierra County, California.

This Fire Prevention and Suppression Plan (Plan) is part of NV Energy's compliance obligation and is appended to the Construction, Operations, and Maintenance (COM) Plan. This Plan will be implemented throughout the Project, beginning with the construction period, and it details the measures to be taken during construction and operation of the Project to: 1) reduce the risk of starting a fire, and 2) suppress a fire in the event one occurs within the construction area. This Plan identifies fire-related risks inherent in this type of project and actions to reduce those risks. It describes the types of firefighting suppression equipment required during construction and the appropriate response if a fire occurs.

1.1 PURPOSE AND NEED

The risk of fire danger during construction of a transmission line is related largely to the use of vehicles and other motorized equipment operating off roadways, and the handling and use of explosive materials and flammable liquids.

The purpose of this plan is to outline responsibilities, notification procedures, fire prevention measures, fire suppression equipment, and post-fire rehabilitation strategies related to the needs of this Project. The Project will cross areas that support vegetation types that are susceptible to wildfire during dry seasons. The need is to minimize the risk of Project-related fires and, in case of fire, provide for immediate suppression within the construction area. Other plans containing information related to fires include: the Hazardous Materials Management and Spill Prevention, Control, and Countermeasure Plan (Appendix A2), the Emergency Preparedness and Response Plan (Appendix A3), and the Blasting Plan (Appendix A4).

1.2 REGULATORY OVERVIEW

This Project will be subject to state, county, and federally enforced laws, ordinances, rules, and regulations that pertain to fire prevention and suppression activities. Key local regulatory agencies include the USFS, Bureau of Land Management (BLM), Nevada Division of Forestry, California Department of Forestry and Fire Protection (CAL FIRE), Truckee Meadows Fire Protection District, and the Reno Fire Department.

2.0 RESPONSIBILITIES

2.1 UNITED STATES FOREST SERVICE

The USFS will oversee all fire control activities on their administrative unit. The designated USFS contact will discuss fire protection stipulations with the BLM and NV Energy's Project or construction manager concerning actions to be taken during fire control activities and will notify NV Energy when fire conditions warrant changes in fire plans. The designated USFS contact will designate an on-site USFS representative.

2.2 BUREAU OF LAND MANAGEMENT

The BLM Fire Management Officer (FMO) will oversee all fire control activities in their administrative unit. The FMO will discuss fire protection stipulations with the USFS and NV Energy's Project or construction manager concerning action to be taken during fire control activities and will notify NV Energy when fire conditions warrant changes in fire plans. The BLM FMO will designate the field monitor as their on-site representative.

2.3 NV ENERGY

NV Energy will be responsible for providing the necessary fire-fighting equipment for their employees and ensuring that all employees and contractors operate under the requirements of this Plan. NV Energy's Project manager will implement the following plan:

- NV Energy will designate a fire marshal from NV Energy to coordinate with the contractor(s)' designated fire marshal and with the USFS and BLM fire management personnel as necessary and who will also fulfill duties described in Section 2.4 for construction areas that are NV Energy's sole responsibility;
- If a fire starts in the Project area, initiate fire suppression activities on the Project until relieved by agency or local firefighting services;
- Comply with federal, state, and local laws, ordinances, rules, and regulations that pertain to prevention and suppression of fire activities;
- Ensure that the contractor(s)' fire marshal is performing regular fire inspections (see below) and takes appropriate protection measures in the event of non-compliance with this Plan;
- Notify the contractor(s) to stop or reduce construction activities that pose a significant fire hazard until appropriate safeguards are taken; and
- Coordinate with the USFS and BLM fire management representative regarding current fire conditions and fire safety warnings and communicate these to the contractor(s)' designated fire marshal (see below).

2.4 CONSTRUCTION CONTRACTOR(S)' DESIGNATED FIRE MARSHAL

NV Energy's prime construction contractor will designate a fire marshal who will be responsible for the following tasks:

- Conducting regular inspections of tools, equipment, and first aid kits for completeness;
- Conducting regular inspections of storage areas and practices for handling flammable fuels to confirm compliance with applicable laws and regulations;
- Posting smoking and fire rules at centrally visible locations on site;
- Coordinating initial response to contractor-caused fires within the easement/right-of-way (ROW);
- Conducting fire inspections along the easement/ROW;
- Ensuring that all construction workers and subcontractors are aware of all fire protection measures;
- Remaining on duty and on site when construction activities are in progress and during any additional periods when fire safety is an issue, or designating another individual to serve in this capacity when absent;
- Reporting all wildfires in accordance with the notification procedures described below;
- Initiating and implementing fire suppression activities until relieved by agency or local firefighting services in the event of a Project-related fire; and
- Coordinating with the NV Energy Construction manager regarding current potential fire conditions and fire safety warnings from the USFS or BLM, whichever is appropriate, and communicating these to the contractor's crews.

2.5 NOTIFICATION

The environmental field supervisor will immediately notify the USFS and/or BLM of a fire started in the Project area during construction, its location, and the corrective action taken. During operation and maintenance activities, NV Energy crews, or contract crews under its direction, will be responsible for the notification of a fire started in the Project area, its location, and the corrective action taken. Following verbal notification, NV Energy will provide written documentation. The construction contractor(s) will double-check the following emergency contact numbers for any changes prior to construction. All fires will be reported first to 911 then the Sierra Front Interagency Dispatch Center and if appropriate to the jurisdictional fire agency, regardless of size and actions taken. Table 1 provides a list of emergency fire contacts for the Project:

Table 1 Emergency Fire Contacts

CALL 911 FIRST	
Sierra Front Interagency Dispatch Center (775) 883-3535 for Emergencies (775) 883-5995 for Administration	
USFS Humboldt-Toiyabe National Forest Carson Ranger District (775) 882-2766	BLM Eagle Lake Field Office (530) 257-0456
Nevada Division of Forestry All Fires: (775) 883-3535 State Forest Fire Warden: (775) 684-2501 Eastlake-Washoe Valley Office: (775) 849-2500	CAL FIRE Headquarters: (916) 653-5123 State Fire Marshall (916) 568-3800 Nevada-Yuba-Placer Unit: (530) 823-4270
Truckee Meadows Fire Protection District Fire Chief: (775) 325-6000	Reno Fire Department Reno Fire Chief: (775) 232-0031 Administrative Offices: (775) 334-2300

3.0 FIRE PRECAUTION MEASURES

NV Energy will perform a preconstruction field review prior to commencing operations. The review will use the provisions set forth below to outline the channels of responsibility for fire prevention and suppression activities and establish an attack procedure for fires within the project area. NV Energy will cooperate with local fire prevention authorities and the USFS in eliminating hazardous fire conditions by implementing the following fire plan under the direction of the environmental field supervisor.

During operations that utilize helicopters or air support, daily communication with the Sierra Front Interagency Dispatch Center Aircraft Desk will occur. Contact information including a phone number will be provided in the event of the need to clear airspace for firefighting operations.

NV Energy and its contractors will immediately report all fires to the nearest fire suppression agency by calling 911. If a fire is unmanageable, field crews will evacuate. All fires will be reported to the Sierra Front Interagency Dispatch Center (775) 883-3535 (emergency line), regardless of size and actions taken.

When reporting a fire, the following information will be provided:

- Your Name
- Call back telephone number
- Project Name
- Location: Legal description (Township, Range, Section or Latitude/Longitude); and Descriptive location (Reference point)
- Fire Information: Including Acres, Rate of Spread and Wind Conditions

Additionally, NV Energy and its contractors will comply with the following requirements:

a) Notify Sierra Front Interagency Dispatch Center daily by phone (775) 883-5995 (non-emergency line) with the scheduled work activities including hours of operation and request that the Fire Duty Officer is notified with this information. Obtain the daily fire danger rating for the Front Valleys and follow the required mitigation measures according to the adjective ratings in Section 3.1 of this document.

b) At least one radio, cellular telephone, and/or satellite phone will be available to contact fire suppression agencies or the Project management team. Smoking shall not be permitted, except in a barren area or in an area cleared to mineral soil at least three feet in diameter. All burning tobacco and matches will be completely extinguished and discarded in ash trays, not on the ground.

c) Briefing all employees on the fire precaution plan and associated requirements.

d) If a fire does start by accident, immediate steps will be taken to extinguish it (if it is safe to do so) using available fire suppression equipment and techniques. Fire suppression activities will be initiated by NV Energy and/or its contractor(s) until relieved by agency or local firefighting services.

e) All vehicles will contain a fire extinguisher.

f) NV Energy and its contractors will provide continuous access to roads for emergency vehicles during construction.

g) "NO SMOKING" signs and fire rules will be posted at construction staging areas, helicopter fly yards, and key construction sites during the fire season.

h) The use of torches, fuses, highway flares, or other warning devices with open flames will be prohibited. NV Energy and its contractors will only use electric or battery-operated warning devices on site.

i) No blasting will be performed without the notification of NV Energy's construction manager and/or the Project environmental manager. Blasting operations will follow the requirements described in the Blasting Plan (Appendix A4).

j) No open burning, campfires, or barbeques will be allowed along the ROW, at construction staging areas, helicopter fly yards, substations, on access roads, or in any other Project-related construction areas.

k) Back-pumps filled with water (two at each wood-cutting site, one at each welding site, and two at each tower installation or construction site, or any activity site at risk of igniting fires) will be supplied.

l) Vehicles will not be driven on dry grass or brush.

m) Proper vehicle maintenance will be implemented, including:
   a. Securing trailer chains, ensuring they don't drag on the ground;
   b. Checking tire pressure to avoid underinflated tires, exposed wheel rims can throw sparks;
   c. Brakes will be properly maintained to avoid metal on metal contact.

3.1 FIRE RESTRICTIONS

If Fire Restrictions are in effect the following prohibitions will be abided by, pursuant to 36 Code of Federal Regulations (CFR) 261.50(a) and (b) until further notice unless approved in writing by the District Ranger and District Fire Staff with the Forest Supervisors approval.

a) Building, maintaining, attending, or using a fire, campfire, or stovefire. [36 CFR 261.52(a)]

b) Smoking, outside an enclosed vehicle or building. [36 CFR 261.52(d)]

c) Welding or operating an acetylene or other torch with open flame. [36 CFR 261.52(i)]

d) Using an explosive. [36 CFR 261.52(b)]

e) No chainsaw use after 1:00 PM, when fire restrictions are in effect. If a Red Flag warning or fire weather watch is in effect, all wood cutting is prohibited until the warning is lifted.

The wildland fire danger rating system established by the USFS is designed to estimate the relative effect of weather on several aspects of fire behavior, such as spread, intensity, and ignition. The combination of these effects makes up the fire danger rating, the severity of which is as follows: Low, Medium, High, Very High, Extreme.

Low Fire Danger Rating Restrictions

All activities at the Project site will include the following safeguards and restrictions no matter the level of fire restrictions in place:

1. Except for motor trucks, truck tractors, buses and passenger vehicles equipped with a maintained muffler, equip all hydro-carbon fueled engines, both stationary and mobile, including off-highway vehicles and motorcycles, with spark arresters that meet

U.S. Forest Service Standards as specified in the Forest Service Spark Arrester Guide and maintain the spark arresters in good operating condition. The Forest Service Spark Arrester Guides are available at the https://www.fs.fed.us/t-d/programs/fire/spark_arrester_guides/.

2. Equipment service areas, parking areas and gas and oil storage areas shall be located so that there is no flammable material within a radius of at least 50 feet of these areas. Keep work areas clear of flammable material such as oily rags and waste, paper, cartons, and plastic waste and utilize proper containers for material storage. “NO SMOKING” signs will be posted in these areas at all times.

3. All stationary fuel tanks will be grounded.

4. Small mobile or stationary engine sites shall be cleared of flammable material for a radius of at least 16 feet from the engine.

5. Confine welding and grinding activity to cleared areas having a minimum radius of 10 feet measured from the place of welding or grinding. Welding or cutting activities will cease one hour before all fire response personnel leave a construction area to reduce the possibility of welding activities smoldering and starting a fire.

6. Each piece of equipment will be furnished with the following:

   a) Each truck, personnel vehicle tractor, grader or other heavy equipment with one shovel, one axe or pulaski, and one fully charged fire extinguisher UL rated at 2-A:10-B:C, or larger

   b) Each welder will have two shovels, one fire extinguisher and one back-pack filled with five gallons of water or other extinguishing solution with a hand pump.

   c) Each gasoline-powered tool such as chain saws, soil augers and rock drills require two shovels and two fully charged chemical pressurized fire extinguisher. The required fire tools shall, at no time, be farther than 26 feet from the point of operation of the power tool.

   d) Equip each mechanized machine that have hydraulic systems with at least two 4A:80-B:C fire extinguishers, or equivalent for each powered by an internal combustion engine (chipper, feller/buncher), except tractors and skidders. In addition, concentrations of wood dust and debris shall be removed from such equipment daily.

   e) Hardhat, work gloves, and eye protection

.

   f) All shovels shall be size "O" or larger and shall be not less than four feet in length.

7. Fuel service trucks will contain one 35-pound capacity fire extinguisher charged with the necessary chemicals to control electrical and fuel fires.

Moderate Fire Danger Rating Restrictions

When the fire danger rating reaches **"Moderate"** the following precautions shall be taken in addition to the conditions specified above:

1. Provide water tank truck or trailer on or in proximity to the Project area for fire control during all working hours and as specified herein.

    a. Equip truck with fire tools (shovel, axe or pulaski's) to provide for one tool per person, two backpack five gallon water-filled tanks with pumps, and one chainsaw of 3.5 (or more) horsepower with a cutting bar of at least 20 inches in length.

    b. In addition to being available at the work site, the truck and operator shall patrol the area of construction for at least 1 hour after shutdown.

High Fire Danger Rating Restrictions

When the fire danger rating reaches "**High**", the following precautions shall be taken in addition to the conditions specified above:

Provide water tank truck or trailer on or in proximity to the Project area for fire control during all working hours and as specified herein.

a. Equip truck with a 500-gallon or greater tank of water with a gasoline motor powered pump and 250 feet of 3/4 inch hose on a reel with a pump capacity of 150 psi or greater and fuel sufficient for 2 hours of operation.

b. All welding and grinding shall be discontinued except in an enclosed building or within an area cleared of all flammable material for a radius of 16 feet and must be pre-wet.

c. No welding or grinding, unless it is in an enclosed building during the time frame designated as **Red Flag Warning**. Burning or blasting shall not be permitted. At Project access points provide a sign to notify workers of the time the restriction becomes effective.

Very High Fire Danger Rating Restrictions

When the fire danger rating reaches "**Very High**", the following precautions shall be taken in addition to the conditions specified above:

a. Chainsaw and mastication operations shall be discontinued after 1:00 PM.

b. All welding and grinding shall be discontinued except in an enclosed building or within an area cleared of all flammable material for a radius of 16 feet and must be pre-wet for a radius of at least 40 feet.

c. All blasting shall be discontinued unless the area has been previously cleared from all flammable materials.

d. Smoking will be permitted only in an enclosed vehicle equipped with an ashtray or in an enclosed building.

e. Except in case of emergency, vehicular travel will be restricted to cleared areas or areas which have been pre-wet and are accessible by pressurized water hose or pressurized water tank.

f. In areas not cleared for a radius of 16 feet, pre-wet the area before beginning operations. Maintain the area in a wet condition and provide one lookout with fire-fighting equipment.

g. During the time frame designated as **Red Flag Warning**, no welding or grinding, unless it is in an enclosed building. Burning or blasting shall not be permitted. At Project access points provide a sign to notify workers of the time the restriction becomes effective.

Extreme Fire Danger Rating Restrictions

When the Fire danger Rating reaches "**Extreme**", the following precautions shall be taken in addition to the conditions specified above:

a. A special written authorization from the District Ranger in consultation with the District Fire Management Officer must be obtained in advance of any welding, grinding, blasting or cutting metal. All other activities are prohibited.

b. Any work that could start a fire shall require properly equipped fire personnel to be assigned to an operation for the duration of the work to provide for immediate fire response.

c. No welding, blasting or grinding of any kind shall be permitted unless it is in an enclosed building or within an area cleared of all flammable material for a radius of 32 feet and must be pre-wet for a radius of at least 60 feet.

d. In areas not cleared for a radius of 32 feet, pre-wet the area before beginning operations, for example but not limited to mastication or mowing. Maintain the area in a wet condition and provide a lookout with fire-fighting equipment.

e. During the time frame designated as **Red Flag Warning**, no welding or grinding, unless it is in an enclosed building. At Project access points provide a sign to notify workers of the time the restriction becomes effective.

4.0 IN CASE OF FIRE - INITIAL RESPONSE

If a fire does start in the Project area during construction, operation, or maintenance, and if the fire is manageable, safely attempt to control it with a fire extinguisher or other available equipment.

As part of the environmental compliance training program, the contractor(s) will receive training on the following:

- Initial fire suppression techniques;
- Fire event reporting requirements;
- Methods to determine if a fire is manageable;
- Fire control measures to be implemented by field crews on site;
- When the worksite should be evacuated;
- How to respond to wildfires in the vicinity; and
- How to maintain knowledge of, and plans for, evacuation routes.

If a fire is unmanageable, field crews will evacuate and immediately call "911" or the district dispatch for the area (see emergency fire contacts listed in Table 1). All fires will be reported to the jurisdictional fire agency, regardless of size and actions taken.

5.0 POST-FIRE REHABILITATION STRATEGIES

If the cause of a fire is determined to be the result of the Project, NV Energy will implement rehabilitation measures to support the following goals:

- Restoration of high-quality wildlife habitat and various vegetation types;
- Restoration of range value;
- Suppression of invasive weeds;

- Prevention of increased fire hazard; and
- Prevention of increased erosion.

The following post-fire rehabilitation measures will be implemented by NV Energy:

After a fire has been extinguished, the burn areas will be reclaimed in accordance with agency and landowner requirements. Small fires will be revegetated to the native vegetation using appropriate seed mixtures. Larger fires may require restoration plans. Coordination with the applicable agencies would be necessary to determine requirements for each particular area, depending upon the size and location of a fire, and the location of sensitive resources. For more details, refer to the Reclamation and Habitat Restoration Plan (Appendix C3).

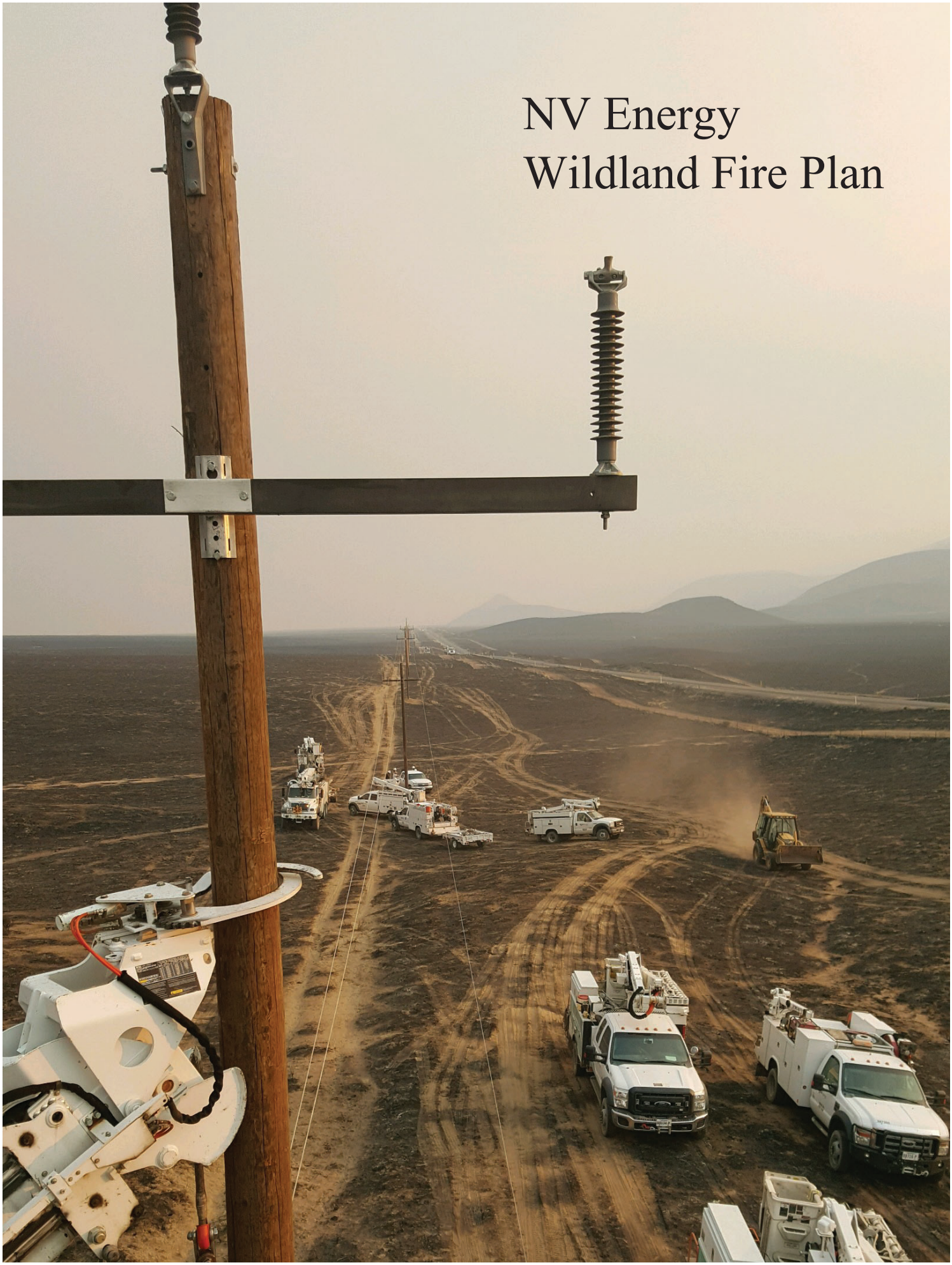
To prevent the spread of invasive weeds during post-fire rehabilitation, the following measures will be implemented by NV Energy and/or its contractors:

- Off-road vehicles and all-terrain vehicles will be inspected and will receive high pressure air or water cleaning on the undercarriage if necessary, with special emphasis on axles, frame, cross members, motor mounts, underneath the steps, running boards, and front bumper/brush guard assemblies;
- Clean off-road equipment (power or high-pressure cleaning) of all mud, dirt, and plant parts before moving into weed-free areas;
- NV Energy and the contractor employees working in the field will receive basic weed identification training;
- NV Energy will implement a Noxious Species Abatement Plan (Appendix C1) and a Reclamation and Habitat Restoration Plan (Appendix C3); and
- Reclamation activities will use certified weed free seed.

APPENDIX C

NV Energy's Wildland Fire Plan

NV Energy
Wildland Fire Plan



WSUP23-0032
EXHIBIT G

Table of Contents

Overview

Purpose

To outline procedures and responsibilities required by staff in response to a wildland fire and how to work with external agencies during the emergency.

Scope

Applies to all employees involved in the wildland fire response – including office staff and field personnel.

1.0 Roles and Responsibilities

1.1 Electric System Control Center (ESCC)

Role: Provide current information to NV Energy (NVE) personnel to maintain optimal employee, equipment and public safety. Assure the electric system is operating in compliance with National and Federal guidelines.

Responsibilities

- If field personnel, a customer, or an outside agency calls to report a wildland fire that impacts NVE infrastructure; the electric dispatcher will request a troubleshooter respond to the scene to assess the potential impact.
- When a fire/dispatch agency or response agency calls NVE electric dispatch, the electric dispatcher will gather the following information to share with the Fire Liaison:
    - Where is the fire?
    - Who is the incident commander?
    - What is the incident commander's contact number?
    - Where is the Incident Command Post (cross streets or address is preferred)?
- Electric dispatch will notify Lines Duty Supervisor and/or Substation Duty Supervisor that there is a fire in the area and a Fire Liaison is needed.
- Electric dispatch should inform the Fire Liaison of any requests from outside agencies that come directly to them regarding de-energizing lines. This will ensure constant and accurate communication between all departments involved.
- Assist with requests from the field to de-energize and/or re-energize lines affected by the fire or for safety concerns.

1.2 Electric Fire Liaison

Role: Act as the NV Energy representative to the Incident Commander (IC) at the Incident Command Post (ICP).

Responsibilities

- Provide coordination between responding fire agencies, NVE field personnel, and system control.
- Contact fire dispatching agency (see contact list at the end of this procedure) to acquire additional information including Point of Contact, POC phone number, Incident Command location, and any other pertinent information that is available, such as extent of fire.
- Contact Incident Commander by phone, exchange contact information, and get more details about the fire including: extent, location, and proximity to our facilities and need for response by NVE field personnel including de-energizing line or accessing damaged area to repair facilities.
- Attend operational briefings at the Incident Command Post (ICP), if appropriate, to exchange information.
- Provide fire information to NVE GIS to prepare map overlaying NVE facilities in fire map.
- Obtain status of NVE electric system and requirements from the field personnel of affected departments to relay to fire Incident Command.
- Communicate with appropriate stakeholders in Electric Delivery to provide requirements for the NVE responding crews including what PPE is required, if any, potential hazards to be aware of, and Incident Command contact information.
- Maintain communication and provide updates to impacted stakeholders.
- Relay next operational period NVE objectives/tasks to Incident Commander.

1.3 NVE Electric Delivery Field Personnel (Lines and Substations)

Role: Serve as the on-scene subject matter experts for NVE infrastructure. Coordinate efforts to mitigate effects of the fire to assets, as well as, repair or replace damaged facilities. Provide current information to NVE personnel to maintain optimal employee, equipment, and public safety.

Responsibilities

- Upon notification of a wildland fire incident, the Lines Duty Supervisor and/or Substation Duty Supervisor will designate an NVE employee with operational knowledge to become the Fire Liaison for that event.
- Prior to assessing damage, or making repairs, report to the ICP or established staging area.
- Conduct check-in activities with the Incident Command Operations Section Chief upon arrival and departure.
- Ensure timely and accurate communication between field personnel, the duty supervisor and the fire liaison, as needed.

- Field personnel working in the area of a wildland fire will wear their yellow fire gear and any other personal protective equipment necessary, or instructed to by fire agencies.
- Conduct standard crew operations.
- Crews will provide a report to the Duty Supervisor when they leave the incident, including the status of completed repairs and if additional repairs are required.

1.4 Emergency Management

Role: Provide essential coordination between agencies, jurisdictions, and NVE during wildland fires.

Responsibilities

- Assist Executive in Charge (EIC) with notifying Emergency Response Organization (ERO) of activation.
- Send alert notification to ERO regarding upcoming emergency calls.
- Gather relative information about the event to be shared with NVE stakeholders during the ERO activation call.
- Respond to ICP, if EM personnel is available and NVE ERO or local EOCs are not activated. EM ICP response availability will depend on number of ICPs activated in the area and location of ICP.
- Respond and represent NVE at County and local Emergency Operation Center when activated.
- Compile NVE situation report to be sent out to NVE ERO by the EIC.

1.5 NVE Gas Operations

Role: Serve as the on-scene subject matter experts for NVE infrastructure. Coordinate efforts to mitigate effects of the fire to assets, as well as, repair, isolate, or replace damaged facilities. Assist fire personnel with shut off of gas supply to affected structures (commercial or residential). Provide current information to NVE Dispatch and personnel to maintain optimal employee, equipment, and public safety.

Responsibilities

- Upon notification of a wildland fire incident from fire dispatch, electric dispatch, or emergency management, the Gas Duty Supervisor will respond to ICP and work with the incident commander.
- Based on the needs of the incident, the Gas Duty Supervisor will coordinate the response of the NVE gas crews.
- Additional personnel/crews will conduct check-in activities with the Gas Duty Supervisor (located at the ICP) upon arrival and departure.

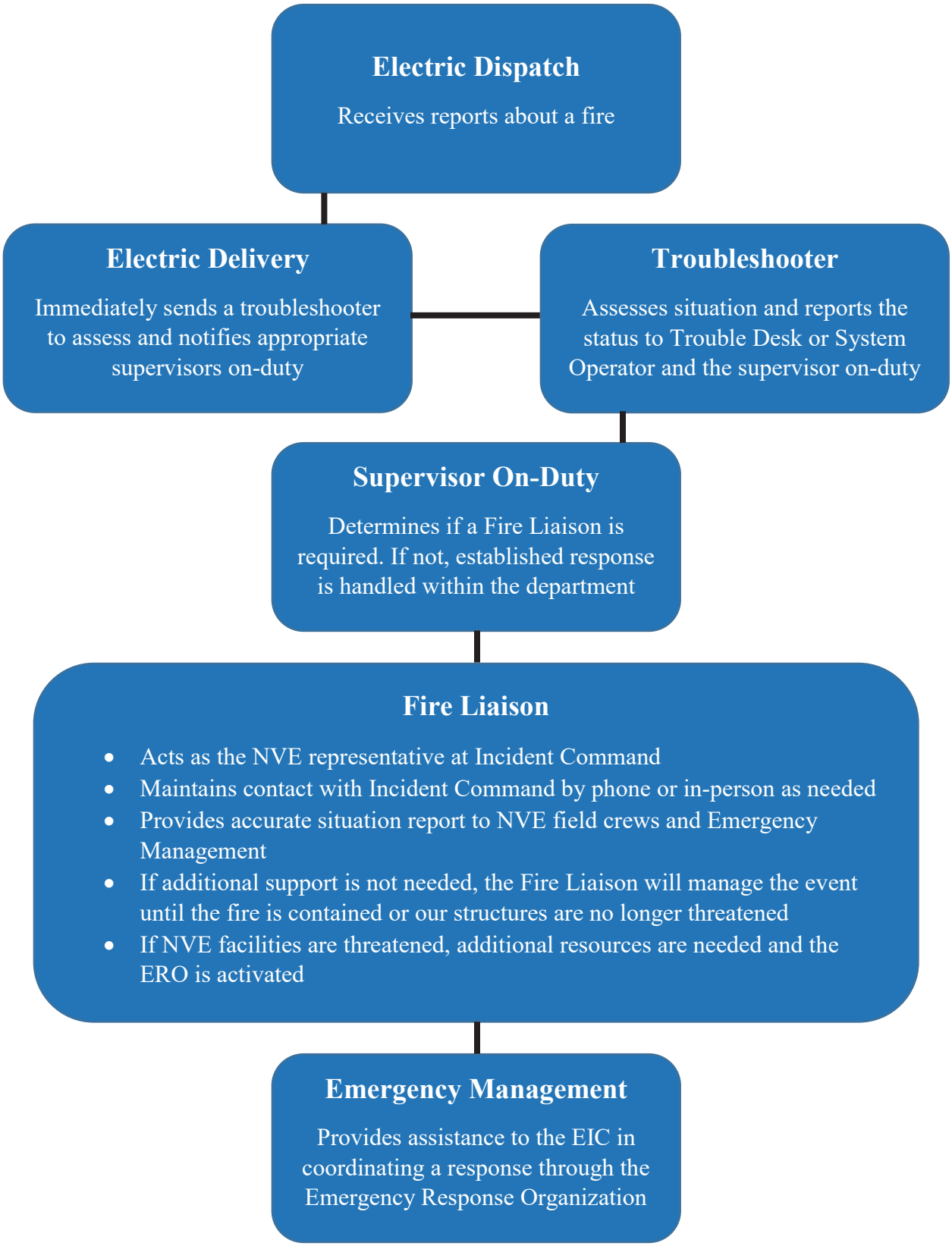
- Field personnel working in the area of a wildland fire will wear their Personal Protective Equipment (PPE).
- Ensure timely and accurate communication between field personnel and Gas Duty Supervisor to include a report when they leave the incident, including the status of completed repairs/shut-offs and if additional repairs or shut offs are required.
- If the event rises to the need for an Emergency Response Organization (ERO) response, Gas Duty Supervisor or leadership will notify emergency management.

2.0 Wildland Fire Agency Contact Numbers

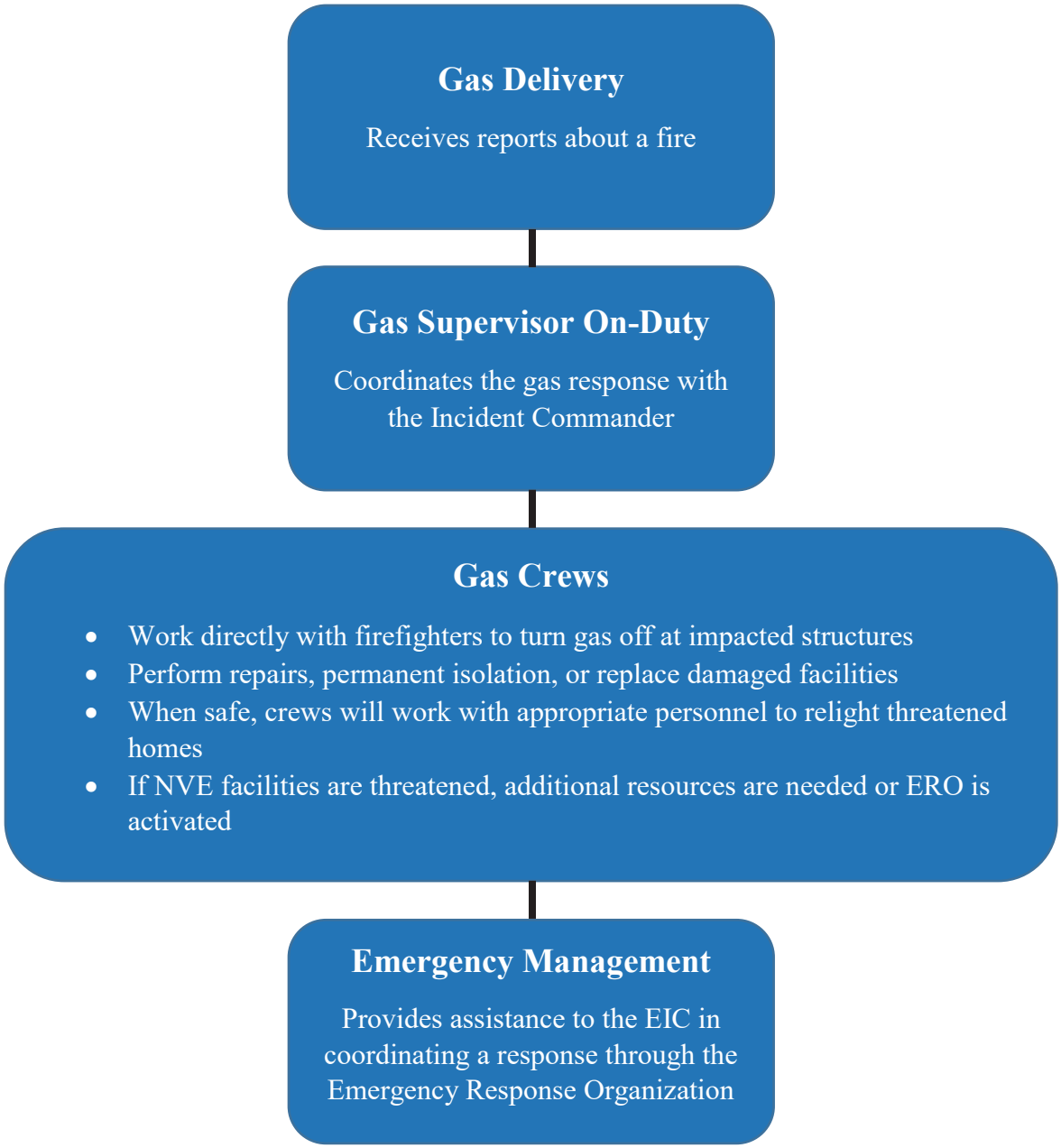
- Minden Dispatch – Regional Resources Dispatched – (775) 883-5995
- Truckee Meadow Fire Protection District Fire Admin Line – (775) 785-4253
- Elko Dispatch Center – (775) 748-4030 or (775) 748-4000

Wildland Fire Questions	
Where is the fire?	
Who is the Incident Commander?	
Incident Commanders Phone Number?	
Is there an Incident Command Post set up?	
Where is it?	
Do you need an NVE rep onsite?	
Can our crews get into the black?	
What PPE is needed?	
Are poles actively burning?	

3.0 Wildland Fire Notification Route



Wildland Fire Notification Route – Gas Delivery



4.0 Personal Protective Equipment

4.1 Inventory List for Wildland Fire Bags

Wildland Fire Gear are "NON STOCK" and include:

- 1 each – Nomex IIIA Yellow Brush Shirt
- 1 each = Nomex IIIA Yellow Brush Pants (Over Pant)
- 1 each - Neck Protector
- 1 each – New Generation Fire Shelter *(Shelter must have BLUE casing, if Yellow please return).*
- 1 each – Web Belt for the fire shelter

4.2 Additional Equipment for Wildland Fire Bag

YOU ARE RESPONSIBLE FOR ADDING THE FOLLOWING ITEMS TO YOUR FIRE GEAR BAG!

Wildland Fire Gear "STOCK ITEMS" from the warehouse include:

- 1 pair – Leather Work gloves (always keep an extra pair in the bag).
- 1 pair goggles – Wildcat Goggles are now in stock in Clear, Smoke, and Amber
- 1 each – Hardhat *(Recommend an additional hardhat with Neck Protector and Goggles already attached).*
- 1 each – Respirator/Dust Mask *(recommend having something available for working in dust hazard environment).*
- Extra socks, cotton tee shirt and bandana are recommended but optional.

4.3 Fire Locker Supplies at 1 Ohm

There are extra PPE in the fire locker located at 1 Ohm if additional yellows are needed for crews going out into the incident. There are also UHF radios in that same locker for crews heading out to the scene. When arriving at the Command Post, ask the Incident Commander/Operations Section Chief to have your radio cloned to match their frequencies.

5.0 Pre-Trip Fire Pumper Inspection Form

Driver must inspect the assigned vehicle before the vehicle is moved

Driver Name:	Vehicle Unit Number:	License Number:	Odometer:

Notify dispatch when leaving the yard and when reporting on-site at the fire.

Report to the incident commander or onsite supervisor and await permission to enter the fire area proceed as directed.

Report to the incident commander or onsite supervisor when leaving the fire area.

Ok	Restock	The items listed below must be on hand prior to reporting to a fire
		Verify utilities/wildland fire contact list & radio list are available
		Check for radio (truck mounted or hand held)
		Personal PPE available (nomex jacket, pants, balaclava, goggles, gloves, shelter, hardhat)
		Water cooler filled
		Fuel and oil level in both truck and pump
		Water level in pumper holding tank
		Fire nozzles and fire gel as needed
		Verify pump is primed (test operationally prior to leaving yard/ pump off when in transit)
		Indian can/ shovel/ axe or polaski
Ok	**Repair**	**If repairs are needed please contact fleet services and return this form**
		Any fluid leaks under the vehicle
		Body condition/company logos/numbers clean and present/dents/or scratches
		Windshield clean/not cracked or chipped
		Windshield wipers not cracked or worn/torn
		Headlights function both hi/low beam not cracked/faded
		Turn signals function/clean both front and rear
		Brake lights function including third brake light
		Reverse lights/back up camera/sensors clean and working properly (if equipped)

		Gas cap present and tight
		Cargo in or on vehicle properly secured
		Tire tread/sidewalls showing damage/dry rot/cracks/wheels/lug nuts inspected
		Proper tire inflation (see inside of driver's door for air pressure amount)
		Engine oil level check (between add and full)
		Fan belt/hoses no obvious damage/loose
		Coolant level between add and full
		Emergency equipment (fire extinguisher/first aid kit/2 orange cones/chocks)
		Mirrors properly adjusted and clean
		Seatbelt functions properly and not worn
		Registration/proof of insurance/accident booklet/amber light permit(if required)
		Circle of safety preformed prior to moving vehicle

You must wear your PPE, including nomex shirt and pants when reporting to the incident commander and when working in the fire area!

Notes:

_____

_____

I have personally inspected the vehicle above and have found it to be in safe operating condition as listed above.

Signature:_____Date:

_____

6.0 Fire Pumper Pre-Trip Checklist

- Take one (1) of the "Fire Truck Only" radio's from Dan Clancy's office for communication with the fire agencies on-site.
- Take two (2) of the wire pull radios with microphones from the Tool Room for communication with Sierra's personnel, Dispatch, etc.
- Take the red, PPE bag from the tool room that contains the Nomex, shelter, etc.
- Take your own personnel PPE, including a hard hat, gloves, and clear safety glasses.
- Fill water cooler and ice chest.
- Check fuel and oil in both the pump and truck. Check water level in pumper holding tank.
- Notify Dispatch when leaving the yard and when reporting on-site at the fire location.
- Report to the Incident Commander and wait to enter the fire area until given permission. If the company has an on-site supervisor at the Incident Command, report to that supervisor and proceed as directed.
- Report to Incident Commander or on-site supervisor when leaving the fire area.

YOU MUST WEAR YOUR PPE, INCLUDING NOMEX SHIRT AND PANTS, WHEN REPORTING TO THE INCIDENT COMMANDER AND WHEN WORKING IN THE FIRE AREA!

7.0 PRE-SEASON ACTIVITIES

The following provides guidelines by area for pre-fire season preparedness. Each area should consider starting these annual activities no later than April 1, with a target completion date of June 1. In some cases, where wildland fire season is forecasted to start earlier, these activities may be implemented in March.

7.1 Emergency Management

Emergency management will perform the following actions annually each spring:

- Coordinate with state and federal fire resources *(e.g. NDF, USFS, BLM)* on lessons learned from the previous wildland fire season, and implement improvements to public/private sector coordination, when applicable.
- Communicate wildland fire season forecasts to company personnel.
- Facilitate a wildland fire season guideline review and update session.

7.2 Field Operations

The following pre-fire season tasks are recommended for field operations managers:

- Participate in NV Energy wildland fire guideline review and update sessions.
- Verify locations and check conditions of specialized equipment, such as tankers and fire pumper trailers.

- Review operating procedures for specialized equipment with personnel.
- Check with local rental companies about access to "spare" water tankers.
- Ensure vehicles working in or around fire potential areas are equipped with a shovel, Pulaski/axe, and a water can.
- Have mechanics check under all vehicles being serviced for accumulating grass or weeds.
- Review available stock and locations of PPE's related to wildland fire season *(e.g. masks, fire shelters).*
- Review system operations Fire Mode patrol and line-testing policies with personnel (*General Review).*
- Provide wildland fire training related to safety equipment, tools and PPE's *(Bi-annual/New Hire).*
- Coordinate with emergency management on wildland fire season public/private sector meetings and exercises.

7.3 GIS Support

The following pre-fire season tasks are recommended for GIS support personnel:

- Participate in wildland fire guideline review and update sessions.
- Implement improvements to fire season maps based on the previous year's lessons learned.
- Update distribution lists for fire maps.

7.4 ESCC – Electric Dispatch

The following pre-fire season tasks are recommended for the regional dispatch manager, and dispatch supervisors:

- Participate in wildland fire procedural guideline review and update sessions.
- Review the procedural guidelines with dispatch personnel and provide training, where applicable.
- Review, update and communicate changes to system operations line-testing policies in coordination with grid operations.
- Update distribution/ notification lists with current contact numbers and emails.

7.5 Safety

The following pre-fire season tasks are recommended for safety managers:

- Participate in wildland fire procedural guideline review and update sessions.
- Review health and safety practices and apply lessons learned from the prior wildland fire season.
- Assist/participate in wildland fire season training with field personnel. Curriculum and audience will be determined on an annual basis by Emergency Management and Operations personnel.
- Review system operations Fire Mode patrolling and line-testing policies with personnel (*general review).*

7.6 Substation Operations

The following pre-fire season tasks are recommended for substation operations managers:

- Participate in wildland fire procedural guideline review and update sessions.
- Review operating procedures for specialized equipment with personnel.

7.7 Substation/Transmission Civil Construction

The following pre-fire season tasks are recommended for general construction managers:

- Participate in wildland fire procedural guideline review and update sessions.
- Review operating procedures for specialized equipment and appropriate training of personnel.

7.8 Fleet Operations

The following pre-fire season tasks are recommended for fleet operations managers:

- Participate in wildland fire procedural guideline review and update sessions.
- Ensure operability for specialized fire related equipment and appropriate training of personnel.

7.9 Materials Operations

The following pre-fire season tasks are recommended for materials operations managers:

- Participate in wildland fire procedural guideline review and update sessions.
- Review fire related inventory levels and vendor availability.
- Prepare mobile warehouse supplies and training of personnel for response to fire areas.

8.0 Record of Change

Revisions, changes, and updates to the NV Energy Wildland Fire Plan are as follows:

Date Revision Completed	Sections Revised and Reason for Revision	Revision Completed by:	Revision Approved by:
2010	Plan Created	J. Reagan	J. Reagan
02/2019	Updated with current information	L. Breeden	R.Tyler

Noxious Weed Abatement Plan
Bordertown to California 120 kV Transmission Line
Construction, Operation, and Maintenance (COM) Plan

Prepared for:

NV Energy
6100 Neil Road
Reno, NV 89511

Prepared by:

Stantec Consulting Services Inc.
6995 Sierra Center Parkway
Reno, NV 89511

August 2020

Table of Contents

List of Tables

List of Figures

List of Appendices

LIST OF ABBREVIATIONS

BLM	Bureau of Land Management
CDFA	California Department of Food and Agriculture
COM	Construction, Operations, and Maintenance
EIS	Environmental Impact Statement
EO	Executive Order
GPS	Global Positioning System
HE	Herbicide Use
kV	Kilovolt
NEPA	National Environmental Policy Act
NW	Noxious Weeds
Plan	Noxious Weed Abatement Plan
Project	Bordertown to California 120 Kilovolt Transmission Line Project
ROW	Right-of-Way
RT	Recreation/Roads/Transportation
SV	Plants and Sensitive Plant Communities
U.S.	United States
U.S.C.	United States Code
USFS	United States Forest Service

1.0 INTRODUCTION

NV Energy and its contractors will construct the Bordertown to California 120 Kilovolt (kV) Transmission Line Project (Project) in compliance with all federal, state, and local regulations as well as the National Environmental Policy Act (NEPA), the Environmental Impact Statement (EIS) and Final Record of Decision, the United States (U.S.) Forest Service (USFS) Special Use Permit, and all other applicable permits. The Project area is in Washoe County, Nevada, and Sierra County, California, west and northwest of the city of Reno, Nevada. The northern boundary of the Project area is near Bordertown, Nevada, and U.S. Highway 395 and the southern boundary is near Interstate 80 between Verdi, Nevada, and Mogul, Nevada. The western boundary is roughly parallel with the California state line and the eastern boundary extends to the Peavine area generally east of Peavine Peak. The constructed 120 kV overhead transmission line will be approximately 11.9 miles long and will run between the existing Bordertown and California substations in Sierra County, California.

This Noxious Weed Abatement Plan (Plan) is part of NV Energy's compliance obligation and is appended to the Construction, Operations, and Maintenance (COM) Plan. This Plan provides guidance to construction managers, environmental inspectors, and regulatory agencies to control the introduction and dispersal of noxious weeds and invasive species during the construction, operation, and maintenance of the Project.

1.1 NOXIOUS WEEDS AND INVASIVE SPECIES DEFINITION

For the purpose of this Plan, noxious weeds and invasive species are defined as introduced plants and animals that are mandated to be restricted or controlled because of their potential to cause economic harm (e.g., affect the quality of forage on rangelands, affect cropland or forest land productivity) or environmental harm (e.g., displace native plants and natural habitats) or harm to human and animal health. Management of these species may be legally mandated by federal, state, county, or other laws and regulations. As discussed in the EIS, this Plan addresses the potential of infestations due to temporary construction disturbance on noxious weeds and invasive species that are of concern in the Project area (USFS 2018).

The noxious weeds and invasive species discussed in this Plan are included in one or more of the following categories:

- Plant species listed as noxious weeds by the State of Nevada Department of Agriculture;
- Plant species listed as noxious weeds by the State of California Department of Food and Agriculture (CDFA);
- Noxious weeds or invasive species of concern to the USFS;
- Noxious weeds of concern to the Bureau of Land Management (BLM).

1.2 GOAL AND OBJECTIVES

The goal of this Plan for the Project is to avoid or limit increases in noxious weeds. To achieve this goal, construction, reclamation, operations, and maintenance activities should be conducted in a manner that will:

- Prevent the introduction or spread of noxious weeds into previously un-infested areas or beyond an existing infestation zone. An infestation zone is defined as an area containing a single, large infestation or several separate infestations after which none occur for several miles.
- Avoid or minimize substitutional increases in noxious and invasive weed population sizes or extents within an existing infestation zone.
- Avoid or minimize substantial increases in noxious and invasive weed population sizes or extents within an existing infestation.
- Avoid or minimize noxious weed and invasive species from moving into areas highly susceptible to invasion, but as yet not dominated by these species.
- Avoid or minimize direct or indirect adverse effects on listed or non-listed special-status plant or wildlife species or sensitive communities.
- Avoid or minimize effects on plant communities or wildlife habitat.

To achieve these goals, this Plan outlines methods to be applied during the construction and reclamation phases of the Project and provides guidance on monitoring and reporting the success of the mitigation measures.

2.0 REGULATORY REQUIREMENTS

Federal and state requirements applicable to the management of noxious weeds in the Project area include the following regulations.

2.1 FEDERAL

2.1.1 Executive Order 13112

Executive Order (EO) 13112 (February 3, 1999) addresses the prevention and introduction of invasive species and provides for their control to minimize economic, ecological, and human health impacts. Invasive species often displace native species and become dominant, in turn affecting native flora, wildlife, watersheds, fire regimes, and recreation. This EO also established the National Invasive Species Council which oversees the implementation of the order, encourages planning and action at multiple levels, develops recommendations for international cooperation, develops guidance pursuant to NEPA for prevention and control of invasive species, and facilitates development of a network of agencies to document, evaluate and monitor impacts.

2.1.2 USFS Invasive Species Management

Invasive species are regulated and/or managed through a variety of statutes administered by the states and the USFS cooperates with the states to implement those. The USFS also works cooperatively with various stakeholders to implement authorities which address invasive species as appropriate. The following orders or statutes are the primary authorities to allow the USFS to conduct invasive species management activities to meet resource management goals and objectives: the Organic Administration Act (16 United States Code [U.S.C.] 551); the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended (16 U.S.C. 1604); the Federal Noxious Weed Act of 1974 (7 U.S.C. 2814); and the Cooperative Forestry Assistance Act of 1978 (16 U.S.C. 2104).

2.1.3 BLM Manual 9015 Integrated Weed Management

The BLM policy relating to the management and coordination of noxious weed activities is set forth in BLM Manual 9015 – Integrated Weed Management (BLM 1992). BLM policy requires that all ground-disturbing projects and any projects that alter plant communities be assessed to determine the risk of introducing or spreading noxious weeds. If the risk is moderate or higher, a positive management program needs to be established. Risk is assessed based on the likelihood of a species to establish as a result of the action, which is based on the presence of noxious weeds in the general area of the project (i.e., within the watershed, or other regional area) and the effect of the action on the vegetation and soil in the area. If there are noxious weeds already present in the area, and if the action will create seedbed conditions conducive to these species, then the risk is considered high. Surface-disturbing activities that expose bare mineral soil or create mesic conditions (e.g., infiltration ponds) generally result in a high risk rating.

2.2 STATE

2.2.1 Nevada Noxious Weed Law

The State of Nevada has enacted laws requiring control of noxious weeds due to the substantial economic losses caused by noxious weeds. The State of Nevada defines noxious weeds as:

> *"Any species of plant which is, or is likely to be, detrimental or destructive and difficult to control or eradicate."*

When Nevada law defines a weed as "noxious," its distribution in commerce is prohibited and its control or management is mandated (Nevada Administrative Code 555). State of Nevada noxious weed definitions are as follows:

- Category A: Weeds not found or limited in distribution throughout the State; actively excluded from the State and actively eradicated wherever found; actively eradicated from nursery stock dealer premises; control required by the State in all infestations.

- Category B: Weeds established in scattered populations in some counties of the state; actively excluded where possible, actively eradicated from nursery stock dealer premises; control required by the State in areas where populations are not well established or previously unknown to occur.

- Category C: Weeds currently established and generally widespread in many counties of the State; actively eradicated from nursery stock dealer premises; abatement at the discretion of the state quarantine officer.

2.2.2 California Noxious Weed Law

Noxious weeds are defined by the state of California in Chapter 1 of the California Department of Food and Agricultural (CDFA) Code, Section 5004, as "any species of plant that is, or is liable to be, troublesome, aggressive, intrusive, detrimental, or destructive to agriculture, silviculture, or important native species, and difficult to control or eradicate, which the director, by regulation, designates to be a noxious weed." The CDFA maintains a noxious weed list and works to prevent the introduction and spread of injurious insect or animal pests, plant diseases, and noxious weeds. Noxious weed species also receive a rating of A, B, C, D, or Q as follows (CDFA 2019):

- A-Rated: A pest of known economic or environmental detriment and is either not known to be established in California or it is present in a limited distribution that allows for the possibility of eradication or successful containment. A-rated pests are prohibited from entering the state because, by virtue of their rating, they have been placed on the of Plant Health and Pest Prevention Services Director's list of organisms "detrimental to agriculture" in accordance with the Food and Agricultural Code Sections 5261 and 6461. The only exception is for organisms accompanied by an approved CDFA or U.S. Department of Agriculture live organism permit for contained exhibit or research purposes. If found entering or established in the state, A-rated pests are subject to state (or commissioner when acting as a state agent) enforced action involving eradication, quarantine regulation, containment, rejection, or other holding action.

- B-Rated: A pest of known economic or environmental detriment and, if present in California, it is of limited distribution. B-rated pests are eligible to enter the state if the receiving county has agreed to accept them. If found in the state, they are subject to state endorsed holding action and eradication only to provide for containment, as when found in a nursery. At the discretion of the individual county agricultural commissioner they are subject to eradication, containment, suppression, control, or other holding action.

- C-Rated: A pest of known economic or environmental detriment and, if present in California, it is usually widespread. C-rated organisms are eligible to enter the state as long as the commodities with which they are associated conform to pest cleanliness standards when found in nursery stock shipments. If found in the state, they are subject to regulations designed to retard spread or to suppress at the discretion of the individual county agricultural commissioner. There is no state enforced action other than providing for pest cleanliness.

- D-Rated: An organism known to be of little or no economic or environmental detriment, to have an extremely low likelihood of weediness, or is known to be a parasite or predator. There is no state enforced action.

- Q-Rated: An organism or disorder suspected to be of economic or environmental detriment, but whose status is uncertain because of incomplete identification or inadequate information.

3.0 OVERVIEW OF EXISTING WEED CONDITIONS

As a result of several large-scale wildland fires that have burned across the region in the past three decades, two vegetation communities are dominated by weeds and annual grasses in the Project area. The annual grasses and forbs community and the ruderal community are dominated by noxious weeds and invasive species, and both are particularly common on the dry, south-facing slopes of Peavine Peak. On Peavine Peak, the annual grasses and forbs community occurs at lower elevations, most commonly on more arid slopes and flats with a southerly aspect. The community is generally dominated by cheatgrass (*Bromus tectorum*), an invasive species, as well as other non-natives or noxious weeds, such as medusahead (*Taeniatherum caput-medusae*). The annual grasses and forbs community often occurs as a direct result of wildfire or over-grazing within eastside pine or mixed conifer-fir communities or in areas dominated by sagebrush (*Artemisia spp.*). The ruderal community is comprised of species that are first to colonize disturbed lands. Within the Project area, the ruderal community is dominated by noxious weeds and invasive species, including cheatgrass. Other noxious weeds or invasive species common to the community include Scotch (cotton) thistle (*Onopordum acanthium*), musk thistle (*Carduus nutans*), bull thistle (*Cirsium vulgare*), Russian thistle (*Salsola tragus*), tumble mustard (*Sisymbrium altissimum*), and tessellate fiddleneck (*Amsinckia tessellata*) (USFS 2018).

Within the Project area, approximately 17 species of weeds, both noxious and invasive, have been documented occurring in large stands (Figure 1). Table 3-1 summarizes the ecology of noxious weeds found within the Project area.

Of the noxious weed species identified within the area, several are of primary concern due to the degree of impact they have on ecosystem function and the density or size of the existing infestations including: musk thistle; spotted knapweed (*Centaurea stoebe* ssp. *micranthos*); yellow star-thistle (*Centaurea solstitialis*); bull thistle; medusahead; perennial pepperweed (tall whitetop) (*Lepidium latifolium*); Scotch thistle; and tamarisk (*Tamarix spp.*) (USFS 2018). Treatment protocols for those species are detailed in Section 5.0 (Table 5-1).

In addition, a total of four invasive species have also been identified in the Project area. Most invasive species are relatively rare within the Project area, except for cheatgrass which is mapped extensively in the Project area. Section 5.0 (Table 5-1) also provides treatment protocols for cheatgrass.

Invasive species include:

- Cheatgrass;
- Fuller's teasel (*Dipsacus fullonum*);
- Himalayan blackberry (*Rubus armeniacus*); and
- Bouncingbet (*Saponaria officinalis*).

3.1 NOXIOUS AND INVASIVE WEED INVENTORY

Prior to any Project construction activities, noxious weeds occurring on either the Nevada or California State list will be inventoried and mapped. The full extent of the population, within the required limits, will be treated prior to and following construction. Treatment methods are specified in design features in Section 4.3. This Noxious Weed Abatement Plan will be updated to include mapping of the locations of the noxious weeds once inventories are completed.

Table 3-1 Ecology and Status of Noxious Weeds in the Project Area

Common Name (*Scientific Name*)	Noxious Weed Rating		Ecological Impact	Abundance	Trend	Rate of Spread	Typical Dispersal Method	Primary Concern Species for Project (Y/N)
	California	Nevada						
Russian knapweed (*Acroptilon repens*)	Noxious B	Noxious B	Moderate	Low	Decreasing	8-11%	Seed, root buds	N
Barbed goatgrass (*Aegilops triuncialis*)	Noxious B	Invasive	High	Low	Spreading	Rapid	Seed	N
Hoary cress/Whitetop (*Cardaria draba*)	Noxious B	Noxious C	Limited	Low	Spreading	Up to 12 feet per year from one plant	Seed, root fragments	N
Musk thistle (*Carduus nutans*)	Noxious A	Noxious B	Moderate	Moderate	Managed-Spreading	Slowly expanding	Seed	Y
Diffuse knapweed (*Centaurea diffusa*)	Noxious A	Noxious B	Moderate	None to Moderate	Managed-Spreading	Very Rapid	Seed, vegetation fragments	N
Spotted knapweed (*Centaurea maculosa*)	Noxious A	Noxious A	High	None to Moderate	Managed	Rapid	Seed	Y
Yellow star-thistle (*Centaurea solstitialis*)	Noxious C	Noxious A	High	None to Low	Managed-Spreading	Exponential	Seed	Y
Canada thistle (*Cirsium arvense*)	Noxious B	Noxious C	Moderate	None to Low	Managed	Several meters per year	Seed, root fragments	N
Bull thistle (*Cirsium vulgare*)	Noxious C	Invasive	Moderate	Low	NA	Little spread except disturbed areas	Seed	Y
Poison hemlock (*Conium maculatum*)	Invasive	Noxious C	Moderate	Low	NA	Rapid spread in disturbed areas	Seed	N
Field bindweed (*Convolvulus arvensis*)	Noxious C	Invasive	NA	NA	NA	NA	Seed, root nodes	N
Medusahead (*Taeniatherum caputmedusae*)	Noxious C	Noxious B	High	Low	Spreading	<10 years	Seed	Y
Dyer's woad (*Isatis tinctoria*)	Noxious B	Noxious A	Moderate	None to Low	Managed-Eradicated	14% per year	Seed	N

Common Name (*Scientific Name*)	Noxious Weed Rating		Ecological Impact	Abundance	Trend	Rate of Spread	Typical Dispersal Method	Primary Concern Species for Project (Y/N)
	California	Nevada						
Perennial Pepperweed (tall whitetop) (*Lepidium latifolium*)	Noxious B	Noxious C	High	None to Moderate	Managed-Spreading	<10 years	Seed, spreading roots, vegetation or root fragments	Y
Scotch thistle (*Onopordum acanthium*)	Noxious A	Noxious B	High	None to Low	Managed-Spreading	<10 years	Seed	Y
Russian thistle (*Salsola tragus*)	Noxious C	Invasive	Limited	Low	No trend	Stable	Seed	N
Tamarisk (*Tamarix* sp.)	Noxious B	Noxious C	High	Low	NA	6 years, more recently 3-4% per year	Seed, vegetation and root fragments	Y
Puncture vine (*Tribulus terrestris*)	Noxious C	Noxious C	NA	NA	NA	Rapid spread in disturbed areas	Seed	N

Source: USFS 2014

4.0 DESIGN FEATURES

To reduce the potential for the introduction or spread of noxious weeds and invasive plants, design features (Noxious Weeds [NW] 1 through NW 11) would be implemented prior to, during, and following construction activities.

4.1 PRE-CONSTRUCTION/CONSTRUCTION WEED CONTROLS

To prevent the spread of noxious weeds and invasive species from Project construction activities, the following measures will be implemented:

NW 1. Noxious weeds occurring on either the Nevada or California State list will be mapped and the full extent of the population will be treated prior to and following construction. Inventory and treatment areas will extend 100 feet from the right-of-way (ROW)/easement and all ground disturbed by Project activities. Project disturbances include roads proposed for widening, construction access roads, equipment and material staging areas, and vegetation removal, including skid trails and landings.

NW 3. All equipment utilized off existing roads and motorized trails will be cleaned with a high-pressure power washer of all mud, dirt, and plant parts. Following cleaning, equipment will be inspected for plant parts (e.g., leaves, stems, seeds). Equipment will be cleaned and inspected again prior to re-entry if it leaves the Project site. Equipment will be inspected and cleaned again before moving from an area within the Project area with known noxious weed species. Inspections will be completed and documented by qualified personnel such as a noxious weed specialist or botanist.

NW 4. When cut and fill is required to create access roads and structure pads, topsoil will be stockpiled and covered to prevent weeds from establishing in the soil. This topsoil will be re-spread during restoration.

NW 5. Staging areas and fly yards will not be placed in weed infested areas. Staging areas will be inspected by qualified personnel for pre-approved use to reduce the risk of introducing noxious weeds into the project area.

NW 6. Construction of access roads will not occur in areas heavily infested with noxious or invasive weeds.

NW 8. All gravel and/or fill material will be certified as weed-free.

NW 9. NV Energy will coordinate with other county, state and federal agencies to address and treat landscape level infestations of invasive plant species.

NW 10. For invasive plants that can be effectively controlled through grubbing or manual removal, methods that prevent seed spread or re-sprouting will be used. If flowers or seeds are present, the weed will be pulled carefully to prevent seeds from falling and will be placed in an appropriate container for disposal. If flowers and seedheads are not present or are removed and disposed of as described above, the invasive plant may be pulled and placed on the ground to dry out.

NW 11. The appropriate method of control specific to the type of noxious weed will be used. Specific methods will be identified in the COM Plan.

Plants and Sensitive Plant Communities (SV) 2. Prior to construction, once access roads and pole locations are known, the following tasks will be completed for areas where surface disturbance is planned:

a. Pre-construction surveys for jaw-leaf lupine (*Lupinus malacophyllus*), andesite popcorn flower (*Plagiobothrys glomeratus*), and moonwort ferns (*Botrychium spp.*);

b. Mapping and flagging of sensitive plant species, wetland areas, and noxious weeds; and

c. Noxious weed infestations will be treated according to design features NW 1 and NW 2.

The following Recreation/Roads/Transportation (RT) design features will be also implemented to discourage unauthorized off-highway vehicle use of construction access roads that could increase the risk of weed infestations. Design features RT 3 and RT 4 require that all new temporary access roads have a physical closure (i.e., barricade) installed immediately following construction. Barricades will be monitored for effectiveness and compliance with the reclamation.

RT 3. All new access roads (i.e., spur roads and centerline travel roads) specifically constructed for this project will be re-contoured and reclaimed and will have a physical closure installed to prevent motorized access immediately following the completion of construction and restoration. The types of closure and design specification used will be approved by the USFS prior to installation.

RT 4. Physical barriers such as boulders or natural features designed to harmonize with the natural environment of the surrounding area will be installed to prevent unauthorized vehicle use from occurring on restored roads. The use of gates or other such structures for this purpose will be avoided unless determined necessary by the USFS.

4.2 POST-CONSTRUCTION WEED CONTROLS

NV Energy will implement the following post-construction weed control design features:

NW 2. Monitoring and continued treatment in areas that were treated prior to construction will commence the first full growing season after project implementation. Weed treatment will continue until disturbed areas are successfully restored (restoration criteria defined below). Weed treatment will continue during maintenance activities and within the ROW.

Successfully restored areas for the Project are defined as:

Reference sites will be pre-established and approved by the USFS. Reference sites will include plant communities that are representative of the ecological site and must include plant communities that are in a late-seral and ecologically functioning condition. Appropriate reference sites will be determined by collecting baseline cover data to indicate plant succession and community structure.

NW 7. Restoration seed mixes will be certified as weed-free.

4.3 HERBICIDE USE

NV Energy and the construction contractor(s) will implement an herbicide use plan (Section 4.3.1) to help control noxious weeds as part of the Project. During herbicide application, non-target vegetation may be inadvertently exposed through direct spray, downwind drift, runoff of chemical laden soil, and accidental spills. Design features Herbicide (HE) 1 through HE 15 (detailed below) will be implemented as herbicide use features to minimize or avoid effects of herbicide use to non-target vegetation.

HE 1. Herbicides will be used in accordance with label instructions, except where Project design features describe more restrictive measures. An herbicide use plan will be developed and included in the COM Plan (Section 4.3.1).

HE 2. Prior to the start of application, all spray equipment will be calibrated to ensure accuracy of the delivered amounts of herbicide. Equipment used during herbicide application will be regularly inspected to insure it is in proper working order.

HE 3. Herbicide spray applications will not occur when wind velocity is five miles per hour or greater to further minimize the potential for drift.

HE 4. Herbicide applications will not be conducted during rain or immediately following rain when soil is saturated or runoff or standing water is present. Application will occur only under favorable weather conditions, defined as:

a) 30% or less chance of precipitation on the day of application based upon National Weather Service weather forecasting for the Reno area;

b) If rain, showers or light rains are predicted within 48 hours, the amount of rain predicted shall be no more than ¼ inch of rain; and

c) Rain does not appear likely at the time of application.

HE 5. Preparation of herbicides for application, including mixing, filling of wands and rinsing of spray equipment, will take place outside of wetlands, meadows, riparian zones, wells and springs, and other sensitive sites, and more than 300 feet from surface water. Herbicide preparation will occur only on level, disturbed sites such as the interior of landings.

HE 6. A spill cleanup kit will be readily available whenever herbicides are transported or stored. A spill kit will be carried by the applicator at all times when using the wicking application method.

HE 7. Low nozzle pressure (<25 pounds per square inch), and a coarse spray (producing a median droplet diameter of >500 microns) will be used in order to minimize drift during herbicide applications.

HE 8. Prior to treatments in areas of concentrated public use, the public will be notified about upcoming herbicide treatments via posting signs.

HE 9. The herbicide spray nozzle will be kept as close to target plants as possible (within 20 inches) while achieving uniform coverage in order to limit overspray and drift to non-target vegetation.

HE 10. Where riparian vegetation communities occur, herbicide application will be limited to directed foliar spray or wiping methods and spray will be directed away from native vegetation.

HE 11. Herbicide treatments will not occur within 500 feet of sensitive plant occurrences.

HE 12. Herbicide application within wet meadows will be limited to treating invasive plant infestations that occupy less than 100 square feet. Herbicide applications will be limited to wiping techniques with aminopyralid, chlorsulfuron, and glyphosate and treatment of the following high priority species: Canada thistle, yellow star-thistle, Russian knapweed or perennial pepperweed (tall whitetop) which are difficult to eradicate with non-chemical means. Meadows will be surveyed for special status plant species prior to any chemical treatments and will be monitored post-treatment to determine effects to non-targeted vegetation.

HE 13. Herbicide application will not occur within the established buffers for aquatic features shown in Table 4-1.

Table 4-1 Minimum Buffers (ft) for Herbicide Application Near Aquatic Features

Herbicide	Application Method	Dry Aquatic Features	Streams[1] or Ditches with Water[2]	Wetland or Meadow
Aminopyralid	Spot & directed foliar spray	25	25	100
	Wiping	15	150	15
Chlorsulfuron	Directed foliar spray	25	100	100
	Wiping	15	15	15
Glyphosate	Directed foliar spray or drizzle	0	25	25
	Cut stump or wiping	0	15	15
Imazapic	Directed foliar spray	25	75	75
Triclopyr (TEA)	Directed foliar spray	25	75	75
	Wiping or cut stump	15	15	15
Clopyralid	Spot & directed foliar spray	25	50	50
	Wiping	15	15	15

[1]As measured from the edge of the stream channel. If a defined channel is not present (draws do not have defined channels), measurement is from the bottom of the feature.
[2]As measured from the edge of the wet area or the meadow vegetation, whichever is greater. Limited conditions allowing for herbicide application within meadows are described in HE 12.

HE 14. Herbicide application is limited to targeted treatments directed at the plant (spot treatments of the immediate area surrounding the plant are allowed with aminopyralid and clopyralid, only) using a backpack sprayer; broadcast spray methods that dispense chemical over a non-localized area will not be used.

HE 15. Avoid application of Aminopyralid and Clopyralid sprayed mulch materials on revegetation sites.

4.3.1 Herbicide Use Plan

As required, an Herbicide Use Plan will be prepared for the Project once a complete inventory of noxious weeds is completed prior to construction and it is determined what areas and what species will be treated. The completion of a pesticide use proposal form (FS 2100-02, Appendix A) is required by the USFS and will be included in the Herbicide Treatment Plan. The form can also be found at the USFS website:

https://www.fs.fed.us/foresthealth/protecting-forest/integrated-pest-management/pesticide-management/index.shtml

Consultation with Native American tribes and the development of management strategies which protect the integrity of traditional cultural plant gathering locations will occur. Herbicides will not be used to treat noxious or invasive weeds in any Area of Concern or gathering site for local Tribes without consulting with the Tribes.

4.3.1.1 Herbicide Application and Handling

Before application, NV Energy or its construction contractor(s) will obtain any required permits from local authorities. Permits may contain additional terms and conditions that are outside the scope of this Plan. A licensed contractor will perform all herbicide application in accordance with applicable laws and regulations and permit stipulations.

All herbicide applications must be applied in compliance with the United States Environmental Protection Agency label instructions, except where Project design features include more restrictive measures (Section 4.3). Application of herbicides will only occur under favorable weather conditions, defined as:

- Wind velocities are five miles per hour or less;
- 30 percent or less chance of precipitation on the day of application based upon National Weather Service weather forecasting for the Reno area;
- If rain, showers or light rains are predicted within 48 hours, the amount of rain predicted shall be no more than ¼ inch of rain; and
- Rain does not appear likely at the time of application.

Preparation of herbicides for applications (i.e., mixing, filling of wands, and rinsing of spray equipment) will only occur on level, disturbed sites and will take place outside of wetlands, meadows, riparian zones, wells and springs, and other sensitive sites, and more than 300 feet from surface water.

Prior to the start of application, all spray equipment will be calibrated to ensure accuracy of the delivered amounts of herbicide. Equipment used during herbicide application will be regularly inspected to insure it is in proper working order. Herbicide application is limited to targeted treatments directed at the plant (spot treatments of the immediate area surrounding the plant are allowed with aminopyralid and clopyralid, only) using a backpack sprayer. A low nozzle pressure (<25 pounds per square inch), and a coarse spray (producing a median droplet diameter of >500 microns) will be used in order to minimize drift during herbicide applications. The spray nozzle will

be kept as close to target plants as possible (within 20 inches). NV Energy and its construction contractor will comply with herbicide application methods and requirements for sensitive plant, riparian, and wet meadow communities as described in design features HE 10, HE 11, HE 12, and HE 13.

Additionally, in areas of concentrated public use, posting signs will be placed about upcoming herbicide treatments.

4.3.1.2 Herbicide Spills and Cleanup

A spill cleanup kit will be readily available whenever herbicides are transported or stored. A spill kit will be carried by the applicator at all times when using the wicking application method. A spill cleanup kit will include:

- Personal protective equipment including clothing and gloves recommended on the product label or Safety Data Sheet;
- Absorptive clay, “kitty litter,” or another commercial adsorbent; and
- Plastic bags and bucket, shovel, fiber brush, dustpan, caution tape, highway flares (use on established roads only), and detergent.

Response to an herbicide spill will vary with the size and location of the spill, but general procedures include:

- USFS, Sierra County Environmental Health Department, and Nevada Division of Environmental Protection notification;
- Traffic control (roadside cleanup);
- Containing the spilled material;
- Cleaning up and removing the spilled herbicide and contaminated adsorptive material and soil; and
- Transporting the spilled herbicide and contaminated material to an authorized disposal site.

4.3.1.3 Worker Safety and Spill Reporting

All herbicide contractors will be state licensed to apply herbicides (and certified if restricted use herbicides are used) and obtain and have readily available copies of the appropriate Safety Data Sheets for the herbicides used. All herbicide spills will be reported in accordance with applicable laws and requirements.

5.0 TREATMENT METHODS

As stated in Section 3.0, the following species have been identified as a primary concern due to the degree of impact they have on ecosystem function and are subject to treatment and control in the Project area.

- Musk thistle;
- Spotted knapweed;
- Yellow star-thistle;
- Bull thistle;
- Medusahead;
- Perennial pepperweed (tall whitetop);
- Scotch thistle;
- Tamarisk; and
- Cheatgrass.

Table 5-1 provides the suggested treatment control methods specific to each species for the Project. Table 5-2 provides pesticide restrictions based on the state of application.

Table 5-1 Treatment Control Methods of Noxious and Invasive Species

Weed Species	Treatment Options
Musk thistle	• Mowing, tilling or hand removal after bolting but prior to flowering is effective; remove the top two inches of crown by digging before seed production. • Several biological control agents are available. • Apply 2,4-D, chlorsulfuron, metsulfuron or picloram to actively growing rosettes; aminopyralid or clopyralid between rosette and late-bolt stages.
Spotted knapweed	• Mowing plants in bud to flower stage can reduce seed production; repeated hand removal can be effective; do not burn. • Several insect biological control agents are available. • Apply 2,4-D in the rosette stage; apply clopyralid, picloram or aminopyralid between rosette and mid-bolt stages.
Yellow star-thistle	• Grazing, mowing, burning, pulling, digging and cultivation can be effective if done prior to seed production. • Several biological control agents are available. • Apply aminopyralid, 2,4-D, clopyralid, or picloram to actively growing plants before flowering.

Weed Species	Treatment Options
Bull thistle	• To kill bull thistle till, hoe or hand pull it. Seeds will likely be left in the soil, so revegetate the site with desirable plants that will be able to compete with bull thistle and prevent reinvasion. These methods are most effective when done before bull thistle flowers. • Mowing bull thistle will not eradicate the weed, but it can be used to limit the spread of seed if timed properly. Mow once after the plants produce a flower stalk (bolt) but before they flower, and then again about a month later. Mowing will be more effective if used in combination with other management techniques. • When bull thistle plants are in the rosette growth state, clopyralid, MCPA, 2,4-D, or picloram can be used in pastures, rangeland, and non-crop areas. For plants that are in the bolting to bud stages, use metsulfuron or chlorsulfuron. It can also be sprayed during the bolt stage with great success.
Medusahead	• Tillage, mowing or grazing prior to seed set can reduce stands. • Burning has had mixed results; most effective with a hot, slow fire prior to medusahead seed maturity but after other species have dried-down; burning can also be used to reduce the thatch layer, which can increase the performance of soil-applied herbicides. • Apply minopyralid, imazapic, or sulfometuron methyl before emergence or to small, actively growing plants; glyphosate to actively growing plants.
Perennial pepperweed (tall whitetop)	• Mowing, digging, tillage, burning and grazing established stands are not effective. • Apply metsulfuron or chlorsulfuron to actively growing plants through early-bloom; imazapic from full-bloom until plants become necrotic; 2,4-D and glyphosate at bud to flower can be effective if repeated for several years.
Scotch thistle	• Hand-removal, digging or mowing prior to flowering can be effective. • Apply 2,4-D, chlorsulfuron, metsulfuron or picloram to actively growing rosettes; 2,4-D + dicamba, aminopyralid, chlorsulfuron or clopyralid between rosette and late-bolt stage.
Tamarisk	• Cutting, digging or burning must be combined with a chemical application to be effective. • An insect biological control agent is available. • Apply imazapyr to actively growing foliage during flowering; triclopyr, glyphosate or imazapyr as a cut stump or basal bark treatment. Success with the cut stump method using Garlon 4Ultra has also occurred.
Cheatgrass	• The integration of chemical management tools with cultural practices is recommended for successful control. • Disking and other mechanical control treatments alone are typically not recommended because disturbed soil and a fluffy seedbed usually favor cheatgrass. If mechanical control is used, multiple treatments are required to bury cheatgrass seeds at least four to six inches deep to suppress their germination. Mechanical control followed by chemical application may help to reduce the abundance of cheatgrass seeds in the seedbank. • Roundup (glyphosate) can be applied at low rates in early spring to suppress competitive growth and seed production of cheatgrass. Care should be taken to only apply glyphosate when desirable vegetation is dormant to avoid risk of injury to those species. Roundup applications are limited to no more than one contiguous acre in California.

Source: NDA 2019; UNCE 2005; MSU 2008

Table 5-2 Pesticide Use Restrictions

Pesticide Name	Active Ingredient	Use Allowed by State
Weedar 64/LV4/ 2-4, D amine	2,4,-D	NV Only
Telar	Chlorsulfuron	CA or NV
Escort/Patriot	Metsulfuron	CA or NV
Tordon	Picloram	NV Only
Milestone	Aminopyralid	CA or NV
Transline	Clopyralid	NV Only
Plateau	Imazapic	NV Only
Oust	Sulfometuron methyl	CA or NV
Rodeo/Round up Pro/Aquaneat	Glyphosate	CA* or NV
Garlon 3A/4 Ultra	Triclopyr	CA or NV
Habitat/Polaris	Imazapyr	CA or NV
MCPA	2-methyl-4-chlorophenoxyacetic acid	CA* or NV

Source: CDPR 2015 and USFS 2020

5.1 RESPONSIBLE PARTIES

The construction contractor(s) will be responsible for implementing the design features as appropriate prior to and during construction, as well as during the post-construction reclamation phase. NV Energy will be responsible for implementing the design features as appropriate during the operations and maintenance phase. NV Energy and the construction contractor(s) or other subcontractor(s) will not be responsible for pre-existing weed infestations, weeds introduced by another activity (e.g., another construction project, mining, ranching, hunting, etc.), or natural occurrence (e.g., fire); weeds found beyond the ROW; or weeds along existing access roads that are not improved by the Project.

6.0 SUCCESS CRITERIA, MONITORING, AND REMEDIATION

6.1 WEED ABATEMENT SUCCESS CRITERIA

Weed management will be considered successful if noxious weed infestations in areas disturbed by construction are no greater in density and extent than prior to construction, five years following the completion of construction.

NV Energy will not be responsible for new or recurring infestations caused by the spread of weeds from surrounding and adjacent lands, unless it can be demonstrably shown to be the result of disturbance caused by NV Energy.

6.2 MONITORING

Weed abatement monitoring will consist of both qualitative and quantitative analyses. Mapping and flagging will be conducted prior to construction for noxious weeds. Post-construction monitoring will continue annually until success criteria are met. Objectives of monitoring include the following:

- Qualitatively assess and describe the status of weed abatement Project disturbance areas;
- Identify and remedy areas exhibiting weed abatement failure;
- Document and map areas where weed abatement is not progressing;
- Assess if any problems are occurring and determine whether remedial measures are necessary.

Weed abatement monitoring will be conducted during the growing season for most weeds, between late May and mid-July. Monitoring will be conducted by vehicle and/or on foot in the disturbed areas along ROW/easement, the roads proposed for widening, construction access roads, equipment and material staging areas, and vegetation removal areas. Species names and locations of weed infestations will be recorded on field datasheets and Global Positioning System (GPS) coordinates will be recorded using a GPS with sub-meter accuracy. Photographs will also be taken of each targeted population prior to treatment and one year following treatments. Infestation size and density estimates for representative samples will be included on the maps and/or on the field datasheets at the levels listed below.

- Satellite Populations (i.e., possible new colonies): Defined as a very small infestation areas (less than 25 square-feet) that have only a few individual plants and are found apart from dense or large weed populations.
- Infestation Sites: Defined as a site in which a minimum of 25 square-feet is populated by a weed species. Densities of these weed populations will be estimated as high (i.e., greater than 50 plants), medium (i.e., 10 to 50 plants), or low (i.e., less than 10 plants), based on the average number of plants per square-feet. Densities can be defined

differently for different weed species, as appropriate. All density definitions should be provided on the field monitoring sheets.

The data will be qualitatively compared with preconstruction monitoring data for the same infestation areas and/or reference sites adjacent to the original infestation areas.

6.3 REMEDIATION AND ADAPTIVE MANAGEMENT PROCESS

If monitoring indicates that sites disturbed by Project activities have not met or are not trending toward meeting success criteria, the weed abatement methods may need to be adjusted. Herbicide applications will be determined in consultation with the appropriate agencies. Remedial measures will be implemented as soon as practicable in problem areas, selected on a case-by-case basis, and subject to agency and landowner approval.

In some cases, NV Energy will not be able to control the spread of noxious weeds in the Project area independently. Weed distributions in the Project area are also influenced by activities of property owners, authorized users (e.g., recreational users), and managing agencies of public lands like the USFS and BLM. To be truly successful, these property owners and managing agencies would also need to initiate weed abatement controls in the local area and surrounding region. Furthermore, weed abatement can be very difficult in arid areas, especially during drought years.

If noxious weed abatement criteria are not met within five years following the end of construction and reclamation, NV Energy may negotiate with the USFS or appropriate agencies to fund further efforts to comply with the mitigation requirements.

7.0 REFERENCES

Bureau of Land Management (BLM). 1992. BLM Manual 9015-Integrated Weed Management. December 1992.

California Department of Food and Agriculture (CDFA). 2019. Plant Health and Pest Prevention Services. Encycloweedia: Weed Ratings. Accessed April 2019 online at: http://www.cdfa.ca.gov/plant/IPC/encycloweedia/winfo_weedratings.html.

California Department of Pesticide Regulation (CDPR). 2015. California Restricted Materials Requirements. Accessed June 30, 2020 at: https://www.cdpr.ca.gov/docs/enforce/dpr-enf-013a.pdf

Montana State University Extension (MSU). 2008. Cheatgrass: Identification, Biology, and Integrated Management. Accessed August 2019 online at: http://ipm.montana.edu/documents/Cheatgrass.pdf.

Nevada Department of Agriculture (NDA). 2019. Nevada Noxious Weed List. Accessed online August 2019 at: http://agri.nv.gov/Plant/Noxious_Weeds/Noxious_Weed_List/.

United States Forest Service (USFS). 2014. Specialist Report: Vegetation Resources. Bordertown to California 120 kV Transmission Line Project. Sierra County, California and Washoe County, Nevada. Humboldt-Toiyabe National Forest. Carson Ranger District. September 2014.

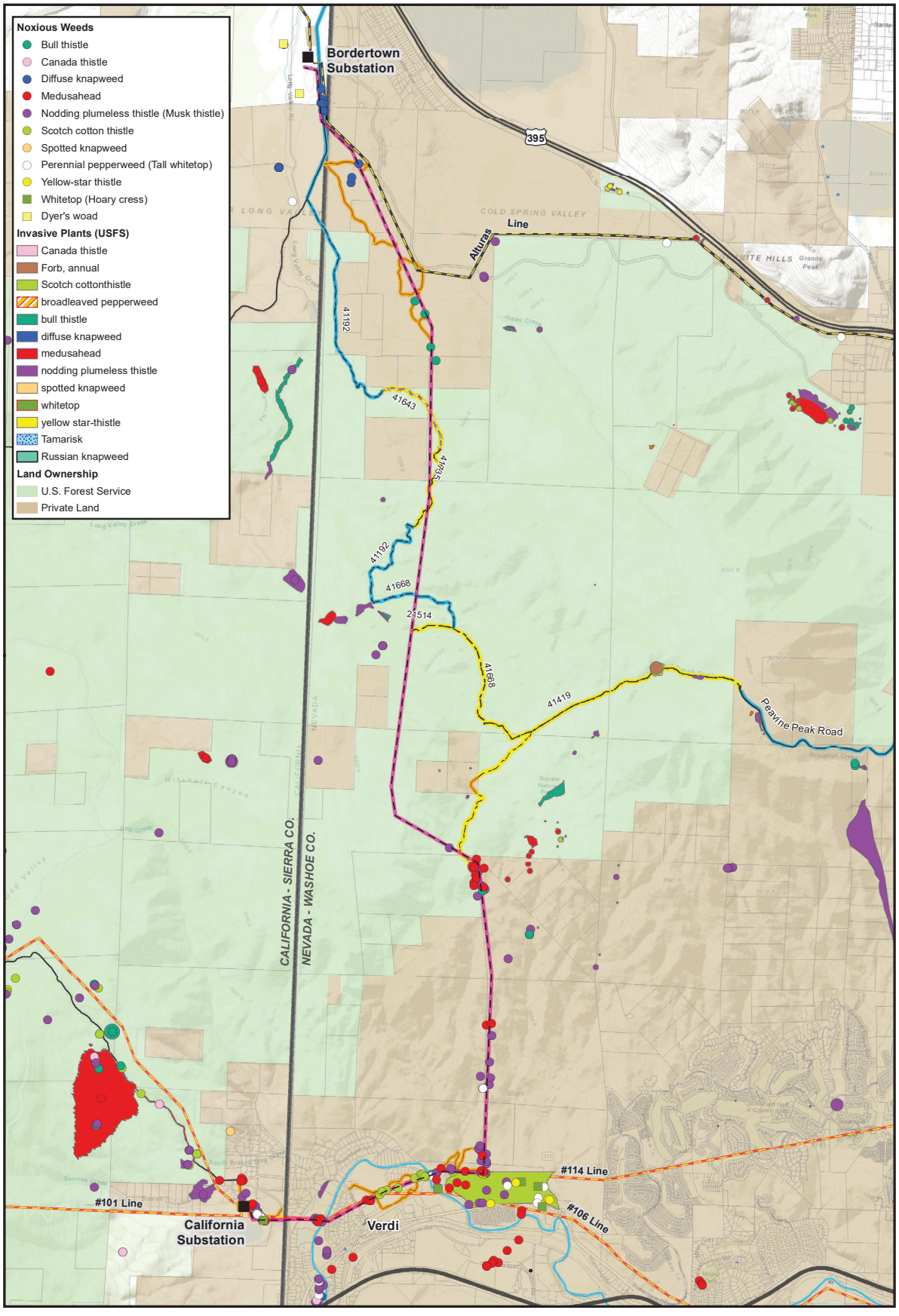
United States Forest Service (USFS). 2018. Final Environmental Impact Statement. Bordertown to California 120 kV Transmission Line Project. Humboldt-Toiyabe National Forest, Carson Ranger District Sierra County, California, and Washoe County, Nevada. June 2018.

United States Forest Service (USFS). 2019. Invasive Species Program: Policy and Authorities. https://www.fs.fed.us/invasivespecies/policy.shtml.

United States Forest Service (USFS). 2020. Approved Herbicides. Memo from Courtney Ghiglieri received via email June 29, 2020.

University of Nevada Cooperative Extension (UNCE). 2005. Identification and Management of Bull Thistle. Accessed August 2019 online at: https://www.unce.unr.edu/publications/files/nr/2005/FS0503.pdf.

FIGURES



Substation
Bordertown to California 120 kV Transmission Line
90-ft ROW
USFS Roads
USFS Roads
USFS Road Not Open to Public Motorized Travel
Private and Roads
Public and Private Road
USFS Roads (Temporary Widening)
USFS Roads Used for Access (No Widening)
Public and Private Roads across Private Land (Temporary Widening; includes Dirt Roads)
Public and Private Roads Used for Access (No Widening)
120 kV Transmission Line
345 kV Transmission Line

N

Stantec

0 2,000 4,000 Feet

1 in = 4,000 feet

T19N, R18E Washoe County, NV
NAD 1983 UTM Zone 11N

DRAWN BY: CJ | 1ST REVIEW: JT | 2ND REVIEW: MB

DATE: 5/11/2020 | PROJECT NO: 203703160

NV ENERGY
BORDERTOWN TO CALIFORNIA 120 KV TRANSMISSION LINE CONSTRUCTION, OPERATION, AND MAINTENANCE (COM) PLAN

Figure C1-1
Noxious Weed Abatement Plan

V:\2037\Active\203703160\03_data\gis_cad\gis\mxds\Appendix_Figures\Fig_1_Noxious_weed_abatement_Plan_v2_11x17P.mxd Revised: 2020-05-11 By: chjohnson

Data Layer Credits: Sources Esri, HERE, Garmin, Intermap, Increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

APPENDIX A

Pesticide Use Proposal Form

Pesticide-Use Proposal

(Reference FSM 2150)

FS-2100-0002 (REV.02/2019)
OMB 0596-0241 Exp. 2/28/2022

To complete this form, see instructions for Form FS-2100-0002, Pesticide-Use Proposal

Agency / Cooperator*	Contact Name, Phone Number and e-mail*

Region*	Forest/District*	Date Submitted*

How would you like to be informed of the decision on your proposal?*

○ Telephone ○ E-mail ○ Both

1) OBJECTIVE a) Project name and/or identifier b) Specific target pests(s) c) Purpose	
2) PESTICIDE PRODUCT(S) a) Trade name b) Formulation as purchased c) Restricted-use Pesticide(yes/no) d) EPA registration number e) Common name of chemical(s) f) AI, AE, IU, or PIB expressed as % or concentration	
3) TYPE OF APPLICATION a) Method b) Equipment	
4) FIELD APPLICATION INFORMATION a) Formulation of material to be applied b) Planned application rate c) Dilution rate d) Diluent e) Pounds of AI or AE per acre(or other applicable rate) f) Other pesticides being applied to proposed treatment site(s)	
5) TREATMENT AREA DESCRIPTION a) Targeted treatment area b) State and County c) Site Description d) Estimate of acres(or other unit) to be treated e) Number of applications f) Month(s) and year(s) of application	
6) SENSITIVE AREAS a) Special designated area (if applicable) b) Areas to be avoided c) Areas to be treated with caution	

WSUP23-0032
EXHIBIT H

7) PROJECT IMPLEMENTATION

a) Trained/certified personnel to be used
b) Personal safety
c) State and local coordination
d) Best management practices
e) Monitoring
f) Additional project information

For Official Use Only

8. REVIEWER SIGNATURE(S)

a) Pesticide Use Coordinator _____ Date _____

b) Other reviewer(s) (as necessary) _____ Date _____

Other reviewer(s) (as necessary) _____ Date _____

Other reviewer(s) (as necessary) _____ Date _____

c) Approval **(signature of approving official)** _____ Date _____

Attach File(s)

Submit by Email

Burden Statement

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The Valid OMB control number for this information collection is 0596-0241. The time required to complete this information collection is estimated to average 2 hours per response including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, and marital or family status. (not all prohibited bases apply to all programs) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc) should contact USDA's TARGET Center at (202) 720-2600 (Voice and TDD).

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.

Wildlife Protection Plan
Bordertown to California 120 kV Transmission Line
Construction, Operation, and Maintenance (COM) Plan

Prepared for:

NV Energy
6100 Neil Road
Reno, Nevada 89511

Prepared by:

Stantec Consulting Services Inc.
6995 Sierra Center Parkway
Reno, Nevada 89511

August 2020

Table of Contents

List of Figures

List of Tables

LIST OF ABBREVIATIONS

APLIC	Avian Power Line Interaction Committee
BLM	Bureau of Land Management
CDFW	California Department of Fish and Wildlife
dbh	Diameter at breast height
EIS	Environmental Impact Statement
ESA	Endangered Species Act
GP	General Practices
kV	Kilovolt
LCT	Lahontan cutthroat trout
LRMP	Land and Resource Management Plan
MBTA	Migratory Bird Treaty Act
MIS	Management Indicator Species
MIS	Management Indicator Species
NDOW	Nevada Department of Wildlife
NEPA	National Environmental Policy Act
PAC	Protected Activity Center
Plan	Wildlife Protection Plan
Project	Bordertown to California 120 Kilovolt Transmission Line Project
RMP	Resource Management Plan
ROD	Record of Decision
ROW	Right-of-Way
SNFPA	Sierra Nevada Forest Plan Amendment
SV	Plants and Sensitive Plant Communities
U.S.	United States
U.S.C.	U.S. Code
USFS	United States Forest Service
USFWS	U.S. Fish and Wildlife Service
VG	Vegetation
WL	Wildlife and Sensitive Wildlife Species

1.0 INTRODUCTION

NV Energy and its contractors will construct the Bordertown to California 120 Kilovolt (kV) Transmission Line Project (Project) in compliance with all federal, state, and local regulations as well as the National Environmental Policy Act (NEPA), the Environmental Impact Statement (EIS) and Final Record of Decision (ROD), the United States (U.S.) Forest Service (USFS) Special Use Permit, and all other applicable permits including the right-of-way (ROW) grant. The Project area is in Washoe County, Nevada, and Sierra County, California, west and northwest of the city of Reno, Nevada. The northern boundary of the Project area is near Bordertown, Nevada, and U.S. Highway 395 and the southern boundary is near Interstate 80 between Verdi, Nevada, and Mogul, Nevada. The western boundary is roughly parallel with the California state line and the eastern boundary extends to the Peavine area generally east of Peavine Peak. The constructed 120 kV overhead transmission line will be approximately 11.9 miles long and will run between the existing Bordertown and California substations in Sierra County, California.

This Wildlife Protection Plan (Plan) is part of NV Energy's compliance obligation and is appended to the Construction, Operations, and Maintenance (COM) Plan. The objective of this Plan is to address the wildlife and wildlife habitat design features and mitigation measures contained in the Project's Final EIS and to provide guidelines for activities prior to, during, and following construction to protect wildlife that may be directly or indirectly impacted by Project activities.

1.1 REGULATORY REQUIREMENTS

1.1.1 Federal Endangered Species Act

Pursuant to the federal Endangered Species Act (ESA) of 1973, the U.S. Fish and Wildlife Service (USFWS) determines if a species should be listed under the ESA, and whether these species should be listed as candidate, proposed, threatened, or endangered. Endangered means a species that is in danger of extinction throughout all or a significant portion of its range. Threatened species are likely to become endangered in the foreseeable future. The USFWS also maintains a list of species or subspecies (i.e., taxa) that may warrant listing as threatened or endangered and for which the agency has sufficient biological information to support a rule to list as threatened or endangered. These species are referred to as candidate species. Proposed species are species (taxa) for which the USFWS has published a proposal to list as threatened or endangered in the Federal Register.

1.1.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act of 1918 (MBTA) (16 United States Code [U.S.C.] 703-712) is administered by the USFWS and is the cornerstone of migratory bird conservation and protection in the United States. The MBTA provides that it shall be unlawful, except as permitted by regulations, "to pursue, take, or kill any migratory bird, or any part, nest or egg of any such bird" (16 U.S.C. 703). However, the MBTA does not regulate habitat. The list of species protected by

the MBTA was revised in March 2010 and includes almost all bird species (1,007 species) that are native to the United States.

1.1.3 Humboldt-Toiyabe National Forest

The Toiyabe National Forest Land and Resource Management Plan (LRMP) outlines the management direction of USFS land (USFS 1986). The regulations require that the USFS maintain viable populations of all vertebrate wildlife and fish species native to the USFS land. Management Indicator Species (MIS) were established to represent significant ecosystems on USFS land and the associated wildlife and fish that depend on the ecosystems. USFS biologists are required to periodically monitor species to ensure management directions are sustaining these ecosystems and species. A variety of factors are included in selecting MIS species. Generally, MIS species include those that are:

- Federally-listed threatened or endangered species;
- State-listed threatened or endangered species;
- Species representative of environmental suitability for other species; and
- Species having significant economic value.

The USFS sensitive species are plant and animal species identified by a Regional Forester for which population viability is a concern, as evidenced by:

- Significant current or predicted downward trends in population numbers or density; and
- Significant current or predicted downward trends in habitat capability that would reduce a species' existing distribution (Forest Service Manual 2670.5).

The Sierra Nevada Forest Plan Amendment (SNFPA) amended the Toiyabe LRMP in 2001 and in again in 2004 (USFS 2004). The SNFPA is designed to facilitate a regionally-consistent management of old forest ecosystem resources across USFS management boundaries and as such is called "framework" (e.g., Sierra Nevada Framework). The umbrella management also applies to other sensitive resources such as aquatic, meadow, and riparian ecosystems. The goals of the plan as they relate to wildlife resources include:

- Improve quantity and quality of useable habitat available for SNFPA species by increasing density of large trees, increase structural diversity of vegetation, and improve the continuity and distribution of old forests across the landscape; and
- Protect and restore desired conditions of aquatic, riparian, and meadow ecosystems in Sierra Nevada national forests.

1.1.4 Bureau of Land Management Eagle Lake Field Office

The Bureau of Land Management (BLM) manages habitat for wildlife and sensitive species outlined in the Eagle Lake Resource Management Plan (RMP) (BLM 2008a) through a variety of mechanisms. Under the authority of the Federal Land Policy and Management Act of 1976, public land must be managed to protect environmental quality and ecological relationships, and where appropriate, to preserve and protect their natural condition. Additionally, the BLM has signed Memorandums of Understandings with the California Department of Fish and Wildlife (CDFW) and Nevada Department of Wildlife (NDOW), where wildlife and wildlife habitat are managed in cooperation with either of these state agencies. Overall the goals for management of habitat for wildlife are to administer public land in a manner that promotes the recovery, restoration, maintenance, or enhancement of endemic wildlife populations.

In addition, the BLM Manual 6840.06 E states that native species may be listed as sensitive if they meet certain criteria (BLM 2008b). The BLM affords these sensitive species the same level of protection as federal candidate species. The BLM's policy for sensitive species is to avoid authorizing actions that would contribute to the listing of a species as threatened or endangered.

1.1.5 California Endangered Species Act

Pursuant to the California ESA, a permit from the CDFW is required for projects that could result in take of a plant or animal species that is state-listed as threatened or endangered. The California ESA defines "take" as an activity that would directly or indirectly kill an individual of a species. Authorization for take of state-listed species can be obtained through a California Fish and Game Code Section 2080.1 consistency determination or a Section 2081 incidental take permit.

1.1.6 California Fish and Game Code - Fully Protected Species

Protection of fully protected species is described in Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code. These statutes prohibit take or possession of fully protected species and do not provide for authorization of incidental take of fully protected species. The CDFW has informed nonfederal agencies and private parties that their actions must avoid take of any fully protected species.

1.1.7 California Species of Special Concern

The CDFW maintains a list of species that may be experiencing or formerly experienced population declines or range retractions that may lead to the species qualifying for California ESA protection, or had naturally small populations exhibiting high susceptibility to risk from factors that could lead to declines qualifying the species for protection under the California ESA. Species under this designation are not afforded legal protection.

1.1.8 State of Nevada Sensitive Species

The NDOW maintains a list of species thought to occur in limited numbers, limited distribution, or may be vulnerable to climatic or landscape scale changes. These are listed as both sensitive

species by Nevada Revised Statute 501.331 and within the Wildlife Action Plan (NDOW 2013) as Species of Conservation Priority. Some of these species are listed as sensitive by the BLM, USFS, or as a conservation priority bird species. Species under this designation are not afforded legal protection.

2.0 OVERVIEW OF WILDLIFE IN PROJECT AREA

2.1 WILDLIFE HABITAT

Bitterbrush-sagebrush (*Purshia tridentata-Artemisia spp.*) habitat is the most widely available wildlife habitat within the Project area. Other prevalent habitats within the variable-width corridor of the Project include forest (i.e., eastside pine), chaparral (with mixed scrub), and annual grasses. Aspen and riparian communities comprise less than one percent of the available habitat within the variable-width corridor of the Project. The Project has substantial non-native annual grasslands present within the variable-width corridor at 24 percent. Annual grasses consist primarily of cheatgrass and other non-native species, which are, in part, a reflection of past wildfires, particularly on the south facing slopes of Peavine Peak. Riparian habitats are available along the Truckee River, and as a result a diversity of species, particularly migratory bird species, may occur within the Project area. The Project area contains approximately 16 acres of aspen and willow habitat combined which provide potentially suitable habitat for a variety of avian species (USFS 2018).

2.2 MANAGEMENT INDICATOR SPECIES

Management Indicator Species (MIS) are identified in the Toiyabe Forest Plan as representing a group of species having similar habitat requirements. Essentially, these species are analogs for all other species that might occur within a given habitat. Managing for these species allows the USFS to preserve a diversity of habitats for more common wildlife. USFS biologists are required to periodically monitor species to ensure management directions are sustaining these habitats and species (USFS 2018).

The MIS expected to occur within the Project area include:

- Mule deer (*Odocoileus hemionus*);
- American marten (*Martes americana*);
- Yellow-rumped warbler (*Setophaga coronata*);
- Williamson's sapsucker (*Sphyrapicus thyrodeus*);
- Hairy woodpecker (*Leuconotopicus villosus*);
- Lahontan cutthroat trout (*Oncorhynchus clarkii henshawi*);
- Northern goshawk (*Accipiter gentilis*);
- Yellow warbler (*Setophaga petechia*); and
- Macroinvertebrates.

2.3 GENERAL WILDLIFE

A variety of common wildlife species occur within the Project area because of the diversity of habitat types that are available including: mammals, birds, reptiles and amphibians, and aquatic species. Species presented below either have been documented, are assumed to occur within the Project area, or could occur as ascertained using the California Wildlife Habitat Relationship System tool (USFS 2018).

2.3.1 Mammals

Mammalian species, in addition to mule deer, that commonly occur within the bitterbrush-sagebrush and chaparral habitats are badger (*Taxidea Taxus*), bobcat (*Lynx rufus*), mountain lion (*Puma concolor*), coyote (*Canis latrans*), and various rodents including California ground squirrel (*Otospermophilus beecheyi*), pocket mice, chipmunks, black-tailed jackrabbit (*Lepus californicus*), cottontail (*Sylvilagus spp.*), and yellow-bellied marmot (*Marmota flaviventris*). Within forest and aspen communities (i.e., habitats) American black bear (*Ursus americanus*), yellow-pine chipmunk, raccoon (*Tamias amoenus*), striped skunk (*Mephitis mephitis*), meadow jumping mouse (*Zapus hudsonius*), and deer mice (*Peromyscus spp.*) occur. Within or adjacent to the Truckee River, North American river otter (*Lontra canadensis*) and weasel (*Mustela spp.*) are expected to occur (USFS 2018).

2.3.2 Birds

The Project area is within the Pacific Flyway for migratory birds and within the contact between Great Basin and Sierra Nevada ecosystems. The Project area supports seasonal habitats for hundreds of birds. Aspen habitat is favored by a variety of cavity-nesting birds, such as bluebirds (*Sialia spp.*), sapsuckers (*Sphyrapicus spp.*), downy woodpeckers (*Picoides pubescens*), nuthatches (*Sitta spp.*), and chickadees (*Poecile spp.*). Species of birds that may occur within the brush and conifer habitat of the Project area include: house finch (*Haemorhous mexicanus*), Bewick's wren (*Thryomanes bewickii*), rock wren (*Salpinctes obsoletus*), Cassin's finch (*Haemorhous cassinii)*, California quail (*Callipepla californica*), horned lark (*Eremophila alpestris*), western meadowlark (*Sturnella neglecta*), spotted towhee (*Pipilo maculatus*), dark-eyed junco (*Junco hyemalis*), northern flicker (*Colaptes auratus*), Steller's jay (*Cyanocitta stellari*), scrub jay (*Aphelocoma spp.*), black-headed grosbeak (*Pheucticus melanocephalus*), ruby-crowned kinglet (*Regulus calendula*), Brewer's blackbird (*Euphagus cyanocephalus*), and pine siskin (*Spinus pinus*) (USFS 2018).

The Truckee River provides habitat for waterfowl and water dependent birds such as mallard duck (*Anas platyrhynchos*), common merganser (*Mergus merganser*), wood duck (*Aix sponsa*), American dipper (Cinclus mexicanus), belted kingfisher (*Mergaceryle alcyon*), heron and swallows.

A number of raptors may be found within the available habitats. Raptors include red-tailed hawk (*Buteo jamaicensis*), American kestrel (*Falco sparverius*), sharp-shinned hawk (*Accipiter striatus*), Cooper's hawk (*Accipiter cooperii*), osprey (*Pandion haliaetus*), northern harrier (*Circus hudsonius*), northern saw-whet owl (*Aegolius acadicus*), great-horned owl (*Bubo virginianus*),

long-eared owl (*Asio otus*), and western screech owl (*Megascops kennicottii*), among others (USFS 2018).

2.3.3 Reptile and Amphibians

The Project area provides diverse brush habitat for reptiles and amphibians. Common species expected to occur are: Great Basin rattlesnake (*Crotalus oreganus lutosus*), western whipsnake (*Hierophis viridiflavus*), rubber boa (*Charina bottae*), gopher snake (*Pituophis catenifer*), Sierra garter snake (*Thamnophis couchii*), western yellow-bellied racer (*Coluber constrictor mormon*), western fence lizard (*Sceloporus occidentalis*), long-nosed leopard lizard (*Gambelia wislizenii*), zebra-tailed lizard (*Callisaurus draconoides*), and horned lizards (*Phrynosoma spp.*). Amphibians that may occur in riparian and wetland areas include western toad (*Anaxyrus boreas*), Sierran tree (chorus) frog (*Pseudacris sierra*), and American bullfrog (*Lithobates catesbeianus*) (USFS 2018).

2.3.4 Aquatic Species

A range of fish species may occur in Dog Creek and/or the Truckee River. According to NDOW, brown trout (*Salmo trutta*), Lahontan redside (*Richardsonius egregius*), mountain sucker (*Catostomus platyrhynchus*), mountain whitefish (*Prosopium williamsoni*), Paiute sculpin (*Cottus beldingii*), rainbow trout (*Oncorhynchus mykiss*), speckled dace (*Rhinichthys osculus*), and Tahoe sucker (*Catostomus tahoensis*) occur within the Project area (USFS 2018).

2.3.5 General Wildlife Habitat Loss

As a result of surface disturbance required for Project construction, general wildlife (including migratory birds) and MIS will encounter a loss of available habitat. Table 2-1 presents the acres of potential habitat within the Project ROW/easement that could be altered or lost from Project construction activities. Most surface disturbance from construction activities would be temporary and vegetation communities would be restored as detailed in the Project design features (Section 3.0).

Table 2-1 Wildlife Habitats within the Project ROW/Easement

Species	Vegetation/Habitat	Acres	
		USFS	Private
Yellow-rumped warbler, Hairy woodpecker, Williamson's sapsucker, Migratory birds	Mixed Conifer – White Fir (*Abies concolor*), Eastside Pine, and Jeffrey Pine (*Pinus jeffreyi*)	8.0	2.2
Mule deer (summer use), Migratory birds	Willow (Riparian)	0.1	1.4
Hairy woodpecker, Williamson's sapsucker, Mule deer (summer use includes Aspen), Migratory birds	Aspen and Mixed Riparian Hardwood	1.1	0.8

Species	Vegetation/Habitat	Acres	
		USFS	Private
Mule deer, Migratory birds	Mountain Mahogany (*Cercocarpus spp.*), Great Basin Mixed Scrub, Bitterbrush-Sagebrush, Chaparral-Snowbrush, and Mountain Sagebrush (*A. tridentata spp. vaseyana*)	50.7[1]	18.1
Mule deer (Big sagebrush), Migratory birds	Big Sagebrush, Low Sage (*A. arbuscula*), Annual Grasses and Forbes and Ruderal, and Urban/Developed	1.7	41.1
Macroinvertebrates	Mixed Riparian Hardwood, Wet Meadow, and Water (Perennial Streams)	0	3.0[2]

[1] Includes approximately 15 acres of Bitterbrush-Sagebrush community on BLM-administered public land at the Bordertown Substation.
[2] Bull Ranch Creek, Truckee River.
Source: USFS 2018.

2.4 SPECIAL STATUS WILDLIFE SPECIES

Special status wildlife species that have the potential occur in the Project area are detailed in **Table 2-2**.

Table 2-2 Special Status Wildlife Species Potential for Occurrence in the Project Area

Special Status Wildlife Species	Status[1]	Habitat	Potential for Occurence[2]
American badger *Taxidea taxus*	SSC	Semi and arid shrubland or grassland with friable soils for digging burrows. Forages on pocket gophers, ground squirrels among others.	Likely to occur.
Spotted bat *Euderma maculatum*	SS, SSC	Roosts on cliffs ranging in habitats from high elevation to deserts. Foraging habitat are areas with moth abundance.	Could occur.
Townsend's big-eared bat *Corynorhinus townsendii townsendii*	SS, BS, SSC	Highly associated with caves and mines. Found primarily in rural settings from deserts to lower, mid to high-elevation mixed coniferous-deciduous forest and has also been reported to utilize buildings, bridges, rock crevices and hollow trees as roost sites.	Could occur.
Fringed myotis *Myotis thysanodes*	BS	Variety of habitats, generally lower elevation. Found roosting in trees, caves, buildings and mines. Forages on small beetles.	Could occur.
Pallid bat *Antrozous pallidus*	BS	Found in a variety of habitats from low elevation coniferous forest, woodlands to sagebrush. Forages on large ground dwelling insects but also moths.	Could occur.

Special Status Wildlife Species	Status[1]	Habitat	Potential for Occurence[2]
Dark-nosed small-footed myotis *Myotis melanorhinus*	BS, SSC	Habitat includes a variety of vegetation communities, roosts in caves, mines, and trees. Forages in open areas.	Could occur.
Yuma myotis *Myotis yumanensis*	BS	Habitat includes all landscapes including human built ones, roosts in outcrops, caves or buildings, forages primarily on emergent aquatic insects.	Could occur.
Sierra Nevada snowshoe hare *Lepus americanus tahoensis*	SSC	Inhabits mid-elevation riparian brush or young conifer thickets.	Could occur.
Northern goshawk *Accipiter gentilis*	MIS, SS, SNF, SSC, BS	Generally nests within late-seral stage montane forest; and in Nevada commonly nests in aspen.	Could occur.
Golden eagle *Aquila chrysaetos*	BGE, BS, FP	Nests on cliffs and rocky scarps with large expanses of hunting territory. Also nests in conifers when rocks are unavailable.	Known to occur.
Northern Harrier *Circus cyaneus*	SSC	Wide-ranging breeders in Nevada and northeastern California. Forages and nests within open habitats such as meadows and grasslands.	Known to occur.
Mountain quail *Oreortyx pictus*	SS	Montane shrub and riparian habitat with *Ceonothus* near water sources.	Known to occur.
Swainson's hawk *Buteo swainsoni*	SSC, BS, CT	Common habitat includes agricultural lands with open foraging habitat, and tall trees for nesting.	Could occur.
Burrowing owl *Athene cunicularia*	SSC, BS	This small owl nests and roosts within burrows, commonly excavated by fossorial mammals. Habitat is found within open grasslands, or other areas of open areas with sparse vegetation, whether natural or altered.	Could occur.
Long-eared owl *Asio otus*	SSC	Generally found within riparian, conifer or other woodland habitats which are open or adjacent to meadows and shrublands. Nest in old corvid or hawk nests in trees or on cliff faces.	Could occur.
Flammulated owl *Psiloscops flammeolus* (syn *Otus flammeolus)*	SS	Open coniferous forests, nest in dead trees with existing woodpecker holes.	Could occur.
White-headed woodpecker *Picoides albolarvatus*	SS	Mixed conifer forests, with a diveristy of pine species (for seed consumption) and mixed ages, generally nest in dead standing trees.	Known to occur.

Special Status Wildlife Species	Status[1]	Habitat	Potential for Occurence[2]
Yellow warbler *Setophaga petechia (syn. Dendroica petechia*)	MIS, SSC	Occur along streams or in bushy thickets and willows; sometimes found in montane chaparral; wide ranging.	Could occur.
Olive-sided flycatcher *Contopus cooperi*	SSC	These flycatchers are mostly associated with edges, openings, and natural and human-created clearings in otherwise relatively dense forests, but they also occupy semi-open forests.	Likely to occur.
Loggerhead shrike *Lanius ludovicianus*	SSC, BS	Open arid shrublands, woodlands, mountain mahogany, with a few perches/lookouts.	Known to occur.
Northern sagebrush lizard *Sceloporus graciosus graciosus*	BS	Sagebrush habitats.	Likely to occur.
Lahontan cutthroat trout (LCT) *Oncorhynchus clarkii henshawi*	T, MIS	Perennial streams and waterbodies on the east side of the northern Sierra Nevada Mountains.	Known to occur.

[1] Status designation:

USFWS ESA
E - Endangered
T - Threatened

Humboldt-Toiyabe National Forest
SS - USFS Region 4 Sensitive Species, Carson District
MIS - USFS Toiyabe Management Indicator Species
SNF - Sierra Nevada Framework Focal Species
BGE - Bald and Golden Eagle Protection Act (USFWS)

Bureau of Land Management
BS - Sensitive Species

State of California: California Endangered Species Act — California Department of Wildlife
CT - Threatened
CE - Endangered
SSC - Species of Special Concern
FP - Fully protected

[2] Potential for occurrence definitions:

Could occur: Suitable habitat is available in the Project area; however, there are few or no other indicators that the species might be present.

Likely to occur: Habitat conditions, behavior of the species, known occurrences in the Project vicinity, or other factors indicate a relatively high likelihood that the species would occur in the Project area.

Known to occur: The species, or evidence of its presence, was observed in the Project area during surveys or was reported by others.

Source: USFS 2018.

2.4.1 Special Status Wildlife Species Habitat Loss

Table 2-3 details the potential habitat for special status wildlife species that could be altered or lost from Project construction activities. Most surface disturbance from construction activities would be temporary and vegetation communities would be restored as detailed in the Project design features (Section 3.0). When deemed appropriate and applicable, NV Energy will perform

pre-construction surveys for northern goshawk and flammulated owl or other USFS sensitive species. Additionally, if construction must occur during the typical avian breeding season (April 1 to July 31), surveys will be conducted prior to construction to location active nesting areas. Section 3.0 provides further details on the Project design features that will be implemented by NV Energy to minimize impacts to special status wildlife species from construction activities.

Table 2-3 Special Status Wildlife Species within the Project ROW/Easement

Species	Vegetation/Habitat	Acres	
		USFS	Private
Northern goshawk, Flammulated owl, White-headed woodpecker, Olive-sided flycatcher	Mixed Conifer, Eastside Pine, and Jeffrey Pine	8.0	2.2
Yellow warbler, Northern goshawk, Flammulated owl, Snowshoe hare, Northern harrier	Willow-Willow Scrub (Riparian)	0.1	1.4
Yellow warbler, Northern goshawk, Flammulated owl, Long-eared owl, Bat species (foraging), Sierra Nevada Snowshoe hare, Northern harrier, Olive-sided flycatcher	Aspen and Riparian Mixed Hardwood	1.1	0.8
Mountain quail, Golden eagle (Mountain sagebrush for foraging), American badger, Loggerhead shrike, Sagebrush lizard	Mountain Mahogany, Snowbrush, Great Basin Mixed Scrub, Bitterbrush, Bitterbrush-Sagebrush, Chaparral, and Mountain Sagebrush	50.7[1]	18.1
Golden eagle (foraging habitat), American badger, Burrowing owl, Swainson's hawk (w/ large nesting trees)	Big Sagebrush, Low Sagebrush, Annual Grasses, Ruderal, and Urban and Developed	1.7	41.1
Bat species, LCT	Riparian Mixed Hardwood, Wet Meadow Water, and Water	0.0	3.0[2]

[1] Includes approximately 15 acres of Bitterbrush-Sagebrush community on BLM-administered public land at the Bordertown Substation.
[2] Bull Ranch Creek, Truckee River.
Source: USFS 2018.

3.0 PROTECTIVE MEASURES

Design features for the Project will be implemented by NV Energy and its construction contractor(s) to minimize impacts to wildlife associated with Project construction. The design features listed below guide the implementation of proper avoidance periods and buffer zones during construction by species. The Environmental Field Maps in Volume I provide mapped locations of sensitive resources and identify specific design features such as buffers and boundaries for seasonal closure habitat (detailed below), best management practices, and construction details that correspond to the protection of specific resources.

3.1 CONSTRUCTION PHASE

3.1.1 General Wildlife (General Practices [GP])

GP 1. All environmentally sensitive areas (i.e., culturally sensitive areas, meadows, and special status plant populations) will be temporarily fenced during construction for avoidance.

GP 2. Prior to construction, all construction personnel will be instructed on the protection of sensitive biological and cultural resources that have the potential to occur on-site by qualified personnel.

GP 9. Signs, flagging, or other readily visible markings will be used to indicate the presence of guy wires to reduce the potential for people and wildlife to run into the wires.

Wildlife and Sensitive Wildlife Species (WL) 5. Excavations deep enough to potentially entrap wildlife species will be covered and fenced at night or when unattended to prevent livestock or wildlife from falling in. All covers will be secured in place and strong enough to prevent breakage by wildlife.

Plants and Sensitive Plant Communities (SV) 3. There will be no new access roads or widening of existing roads for construction access through meadows. This measure will also protect potential habitat for special status plant populations that are found in wetland and meadow habitats, such as Dog Valley ivesia (*Ivesia aperta var. canina*).

3.1.2 Sensitive Wildlife Species

WL 1. If any USFS or BLM sensitive wildlife or plant species are identified during pre-construction surveys or during construction activities, work in the general area of the identified species will be halted until a USFS biologist or other qualified biologist is consulted to determine an appropriate buffer and other protective measures. The USFS will be notified within 24 hours of the discovery of the species. Buffer distance will be established in consultation with the USFS on a case by case basis depending on species and type and magnitude of construction activity. If avoidance is infeasible, consultation with the USFS, and at its discretion, any cooperating agencies will be contacted prior to continuing work in the immediate area of the species. The same process will be implemented in the event that

any federal- or state-listed species are discovered on public land, with the discovery being reported to the USFS or BLM, depending on the respective land administration.

3.1.3 Migratory Bird Species

WL 2. If appropriate, additional surveys for northern goshawk and flammulated owl or other Forest Service sensitive species will be conducted prior to construction by a qualified biologist approved by the USFS. Coordination with the USFS will be conducted prior to commencing surveys to determine appropriate survey methodology, timing, and survey area. If nesting is detected, the USFS will be contacted within 24 hours and Forest Plan standard and guidelines (USFS 2004) will be implemented. A designated Protected Activity Center (PAC) will be delineated around the nest site. Within the PAC no construction activities may occur during the "Limited Operating Period" April 15th-September 30th. Pole construction will need to be designed to span the PAC.

WL 3. To reduce potential disturbance to migratory birds, construction will occur outside the typical avian breeding season (April 1 to July 31). If construction activities cannot be avoided during this time period, surveys will be conducted immediately prior to construction to locate active nesting areas.

WL 4. If active avian nests are located on NFS land or BLM-administered public land, they will be flagged and avoided until after the breeding period. NV Energy will coordinate with the USFS or BLM biologist to determine appropriate time frames for resuming construction.

Vegetation (VG) 1. Placement of the ROW will avoid wherever possible, isolated groups of trees and/or groups of trees with an average diameter of dominant and co-dominant trees greater than 24 inches at breast height (dbh) as directed/approved by the USFS Silvilculturist.

3.1.4 Raptors

WL 9. To protect raptors such as hawks and eagles from electrocution, transmission line and pole structures will be constructed in conformance with the guidelines contained in Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006, prepared by the Avian Power Line Interaction Committee (APLIC) (2006).

3.1.5 Mule Deer

WL 6. To avoid impacts to wintering mule deer, construction will not occur from November 25 through May 25 within areas mapped as crucial winter or winter-spring high deer use, including the Mitchell Canyon Deer Management Area. Non-ground disturbing activities, such as surveying, staking, or resource driven activities (e.g., cultural surveys, biological surveys), may occur within this time frame.

This Design Feature will not apply to work within fenced and cleared areas associated with the existing California and Bordertown substations, including the Bordertown

Substation expansion area that needs to be cleared and fenced prior to the Limited Operating Period (LOP) of November 25 through May 25, as long as the initial clearing of vegetation occurs outside the LOP. Once the vegetation is cleared and the Bordertown Substation expansion area is fenced, construction of the actual facility will no longer be bound to the LOP restriction.

3.1.6 Lahontan Cutthroat Trout

WL 10. To limit the potential for impacts to aquatic resources, particularly to Lahontan cutthroat trout, pole sites or roads will not be placed within the 100-year floodplain in Dog Creek, Bull Ranch Creek, and the Truckee River. During construction, no soil disturbing activities will occur within the 100-year floodplain of these streams (**Figure 1**).

3.1.7 Avoidance Timeframes

A table of construction timelines restrictions for wildlife specific to the Project are detailed in **Table 3-1**.

Table 3-1 Avoidance Timetable for Wildlife

Species	Activity to Avoid	Avoidance Period	Notes
Mule deer	Construction	November 25 through May 25	See WL. 6
Northern goshawk (occupied nests)	Construction	April 15 through September 30	See WL. 2.
Flammulated owl (occupied nests)	Construction	April 15 through September 30	See WL. 2.
Migratory birds	Construction	April 1 through July 31	See WL. 3.
LCT	Construction	Year-Round	See WL. 10 (**Figure 1**).

3.1.8 Change Evaluation

NV Energy may request variances from the above restrictions by using the “Change Evaluation” process. Before any variance from the required design features is allowed, the Change Evaluation process described in Chapter 4, Section 4.9.3 of this COM Plan must be completed. The course of action shall be documented and reported to the USFS (the compliance reporting process is also described in Chapter 4). All efforts will be made to not endanger any special status species.

3.2 RECLAMATION PHASE

3.2.1 Habitat Restoration

NV Energy will promote successful restoration of disturbed habitat by requiring restoration success to be based on reference sites selected by the USFS, as described in VG 7 below and as outlined in the Reclamation and Habitat Restoration Plan (Appendix 3C).

VG 7. Successfully restored areas will be defined as:

Reference sites will be pre-established and approved by the USFS. Reference sites will include plant communities that are representative of the ecological site and must include plant communities that are in a late-seral and ecologically functioning condition. Appropriate reference sites will be determined by collecting baseline cover data to indicate plant succession and community structure.

In addition, to encourage the rapid recovery of vegetation communities that benefit species such as mule deer, NV Energy will only cut brush species at ground level to preserve root systems allowing for re-growth (VG-5 below).

VG 5. Where removal of vegetation other than trees is unavoidable, the vegetation will be cut at ground level to preserve the root structure and allow for potential sprouting.

3.2.1.1 Mule Deer Specific Habitat Restoration

WL 7. To aid in providing browse for wintering mule deer, post construction revegetation in areas mapped as crucial winter and winter spring high use habitat will include a seed mix of brush species preferred by mule deer (i.e., bitterbrush, mountain big sagebrush, mountain mahogany, serviceberry (*Amelanchier spp.*), snowberry, and Wyoming big sage) as well as appropriate forbs and grasses.

WL 8. To ensure that impacts to wildlife habitat, particularly mule deer are no more than minor, vegetation that would be permanently lost or temporarily disturbed from the Project, would require creation of or improvement of on or offsite wildlife habitat. To achieve this, NV Energy will fund a habitat restoration account that includes the cost of restoring three acres to every one acre of habitat that is permanently or temporarily disturbed. The account will be administered by NDOW or a Sierra Front Wildlife Working Group that would include NDOW, Washoe County, USFS, BLM, City of Reno and other interested participants.

4.0 REFERENCES

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

Bureau of Land Management (BLM). (2008a). Record of Decision: Eagle Lake Resource Management Plan. Susanville, California: U. S. Department of the Interior, Bureau of Land Management, Eagle Lake Field Office.

Bureau of Land Management (BLM). (2008b). Manual 6840: Special Status Species Management (Release No. 6-125). U.S. Department of the Interior, Bureau of Land Management.

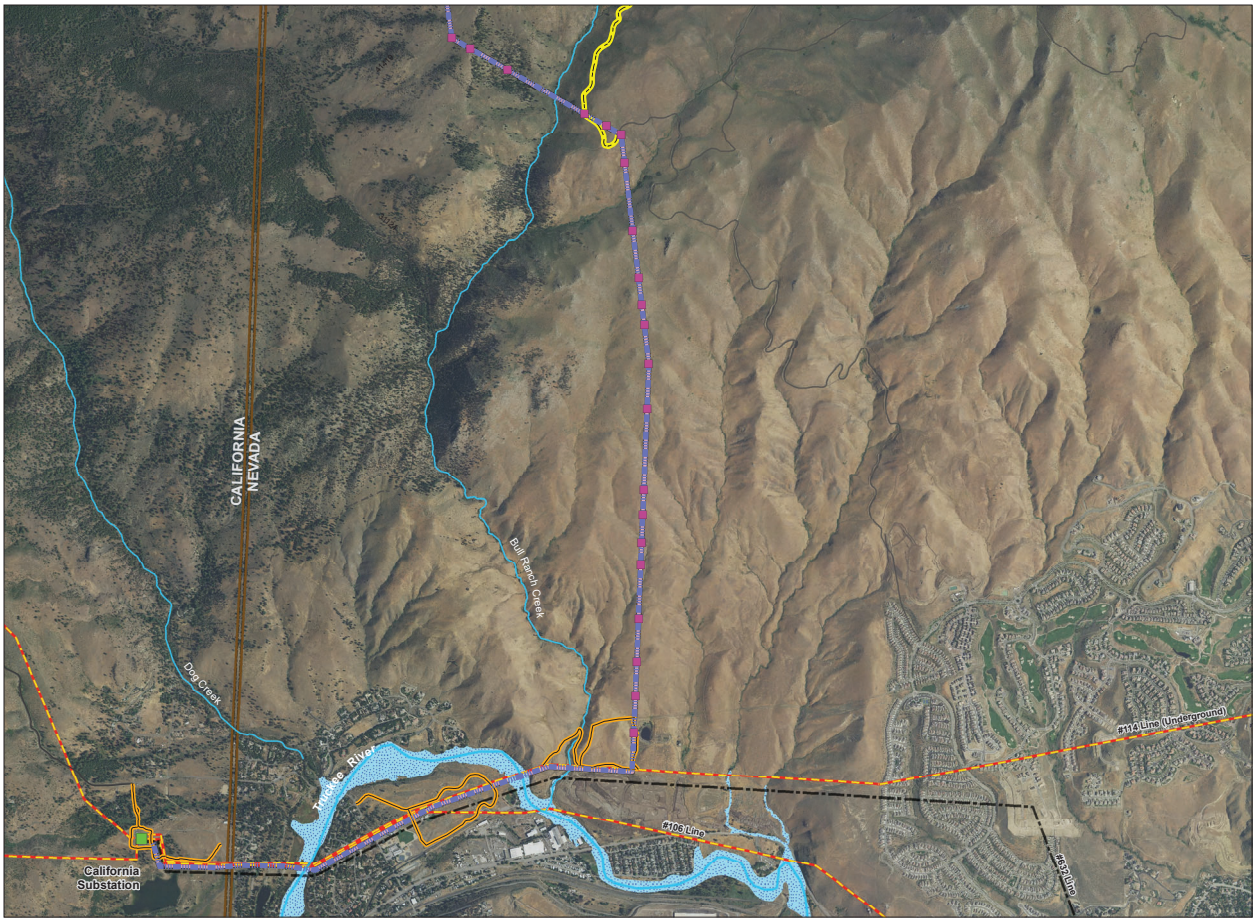
Nevada Department of Wildlife (NDOW). (2013). Nevada Wildlife Action Plan. Reno, Nevada: Nevada Department of Wildlife.

United States Forest Service (USFS). (1986). Toiyabe National Forest Land and Resource Management Plan. U.S. Department of Agriculture, Forest Service, Toiyabe National Forest.

United States Forest Service (USFS). (2004). Sierra Nevada Forest Plan Amendment, Record of Decision (ROD). Vallejo, California: U.S. Department of Agriculture, Forest Service, Pacific Southwest Region and Intermountain Region.

United States Forest Service (USFS). (2018). Final Environmental Impact Statement. Bordertown to California 120 kV Transmission Line Project. Humboldt-Toiyabe National Forest, Carson Ranger District Sierra County, California, and Washoe County, Nevada. June 2018.

FIGURE



Legend

- New Pole Structure
- Substation
- Bordertown to California 120 kV Transmission Line
- Stream

Existing Features

- 120 kV Transmission Line
- 345 kV Transmission Line
- 60 kV Transmission Line
- Public and Private Road
- USFS Roads (Temporary Widening)
- Public and Private Roads across Private Land (Temporary Widening; includes Dirt Roads)
- Flood Plain
- State Boundaries

0 1,000 2,000 Feet
1 in = 2,000 feet

N

Stantec

Sierra County, CA & Washoe County, NV
NAD 1983 UTM Zone 11N

PROJECT NO: 203703160
DRAWN BY: JT
1ST REVIEW: CJ
2ND REVIEW: KC
DATE: 5/11/2020

NV Energy
Bordertown to California 120 kV Transmission Line Construction, Operation, and Maintenance (COM) Plan

Figure 1
LCT Habitat Avoidance Area

V:\203703160\active\203703160.003\gis\arcgis\maps\Appendix_Figures\Figure_1_LCT_Habitat_Avoidance_Area_11x17.mxd Revised: 2020-05-11 By: chjohnson

Stantec Map Credits:

Disclaimer: Stantec assumes no responsibility for data supplied in electronic format. The recipient accepts full responsibility for verifying the accuracy and completeness of the data. The recipient releases Stantec, its officers, employees, consultants and agents, from any and all claims arising in any way from the content or provision of the data.

WSUP23-0032
EXHIBIT I

March 26, 2024

Washoe County
Community Development Department
1001 E. Ninth Street
Reno, Nevada 89520

Subject: NV Energy Transmission Line – WSUP23-0032

To Whom It May Concern:

A design exception to the Washoe County grading code (Article 438) is being requested for this project with respect to the maximum daylight slopes allowed. This letter details out the request for 2:1, 1:1, and 2' maximum vertical cuts to be used on the project for the temporary access roads being proposed. If granted, we would like the exception to be included in the SUP conditions for the project.

BACKGROUND

The SUP for NV Energy's 1104 Transmission Line project (WSUP23-0032) includes a proposed Washoe County condition to provide final grading plans for all of the temporary access roads required to construct the transmission line. The project includes widening of existing USFS roadways as well as new access roads to reach the proposed pole and wire pulling locations. The new roads will be abandoned and any existing USFS roads which are proposed to be widened will be returned to their original state when the power lines are constructed. Timeline is anticipated to be on the order of 1-year.

DESIGN CONSIDERATIONS

To establish design/consideration guidelines for temporary access road construction and performance, United States Forest Service (USFS) temporary road design protocols were reviewed and adopted as indicated herein.

Objective maintenance levels (OML) were examined for USFS roadways. For the design consideration OML 2 was selected. OML 2 is assigned to roads operated for use by high clearance vehicles. Passenger car traffic is not a consideration. Traffic is normally minor, usually consisting of one or a combination of administrative (NVE vehicles), permitted (NVE vehicles), dispersed recreation or other specialized uses.

Temporary roads require minimal cuts and fills, have a minimal number of drainage crossings, and will be decommissioned and restored after their use is completed.

BEST PRACTICES

Because temporary roads require minimal cuts and fills, grading should be limited. Cuts should be limited to all that is necessary to adequately grade the road for access and to provide a balance of fill for the downslope side of the road while maintaining less than the maximum allowable cross-slope. Limiting grading to maintain and not disturb natural slopes, both uphill and down, should be standard practice.

WSUP23-0032
EXHIBIT K

Vertical cuts, on the uphill side of the roadway should be limited to 2-feet. Closing the roads during unseasonably wet weather periods should be considered.

Road conditions should be monitored and where access becomes compromised due to weather or sloughing, debris should be cleared. To the extent possible, slope debris should be regraded back toward and adjacent to the debris source to help buttress the slope profile.

To inform the public, signs indicating NOT MAINTAINED may be prudent at access points to the temporary road.

EXCEPTION REQUEST

Due to the temporary nature of the roadways, a design exception is being requested for the project to be incorporated into the SUP conditions allowing steeper daylight slopes than are currently allowed by Washoe County grading code. By granting this design exception, the grading and restoration extents will be greatly reduced which will help prevent large scarring and unnecessary removal of established vegetation. We are requesting that 2:1 daylight slopes are allowed to be used throughout the project, and 1:1 or vertical cuts (2' max height) are allowed to be utilized in areas where necessary to fit within the maximum 30' grading corridor granted by the USFS permit. By utilizing the best practices listed above during construction, we believe the daylight slopes can be steepened without negative consequence on the temporary access roads being proposed.

SUGGESTED CONDITION OF APPROVAL

Due to grading constraints and the temporary nature of the access roads required for this project, slopes greater than 3:1 as allowed by Washoe County grading code (2:1, 1:1, and 2' max height vertical cut slopes on the uphill side of the roadways) are permitted to be used for the daylight slopes on this project in order to minimize the grading footprint and vegetation disturbance. Road conditions should be monitored and where access becomes compromised due to weather or sloughing, debris should be cleared. To inform the public, signs indicating NOT MAINTAINED may be prudent at access points to the temporary road.

REF: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsm91_048457.pdf

If you have any questions or concerns please contact me at (775) 853-7456 or e-mail me at averling@woodrodgers.com.

Sincerely,
Wood Rodgers Inc.

Ashley Verling, P.E.