

May 30, 2025

Ms. Debbie-Anne Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street N.E.  
Room 1A  
Washington, DC 20426

**Subject: FERC No. 3104 – Lucky Peak Transmission Line Project  
Notification of Intent to File an Application for New License, Pre-Application  
Document, Request to Use Traditional Licensing Process, and Request for  
Designation as Non-Federal Representative. Public Classification.**

Dear Secretary Reese:

Idaho Power Company (Idaho Power) is the licensee and current owner and operator of the Lucky Peak Transmission Line Project, Federal Energy Regulatory Commission (FERC or Commission) No. 3104 (Project). Idaho Power operates the Project pursuant to an existing license issued by FERC on June 30, 1981, that is anticipated to expire on May 31, 2030.

Idaho Power hereby files notice of Idaho Power's intent to file an application for a new license for the Project on or before May 30, 2028 (NOI) (Attachment A). Idaho Power is also requesting FERC's authorization to use FERC's Traditional Licensing Process (TLP) to relicense the Project. In addition, Idaho Power is filing the Pre-Application Document for the relicensing of the Lucky Peak Transmission Line Project (Attachment D).

Pursuant to FERC's regulations, Idaho Power respectfully requests that FERC:

(1) designate Idaho Power as the Commission's non-federal representative for purposes of consultation under Section 7 of the Endangered Species Act (ESA), 16 U.S.C. § 1536, and the joint agency ESA implementing regulations at 50 C.F.R. Part 402, and (2) authorize Idaho Power to initiate consultation under Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108, and the implementing regulations at 36 C.F.R. Part 800 for activities related to the Project relicensing.

With this filing, Idaho Power is simultaneously distributing electronic and/or paper copies of the NOI, PAD, and request to use the TLP to relevant federal and state resource agencies, Native American tribes, non-governmental organizations, and other potentially interested parties (collectively, Interested Parties). See Distribution List, Attachment B. In addition, Idaho Power

is providing two courtesy paper copies of the same to Commission Staff in the Office of Energy Projects and Office of General Counsel – Energy Projects.

On May 19, 2025, Idaho Power published notice of this filing in the Idaho Press, a daily newspaper of general circulation serving Ada County, where the Project is located (Attachment C).

### **REQUEST TO USE THE TLP**

FERC's Integrated Licensing Process (ILP) is the default licensing process for applications filing an NOI and PAD after July 23, 2005. Applicants seeking to use either the TLP or the Alternative Licensing Process must file a request and receive approval from FERC to do so. Therefore, concurrent with the filing of this NOI and PAD, and pursuant to 18 C.F.R. § 5.3, Idaho Power requests approval from FERC to utilize the TLP in lieu of the default ILP to relicense this Project.

### ***Likelihood of Timely License Issuance***

The TLP provides the best opportunity to engage in a timely and efficient licensing process that facilitates Interested Party participation and fosters collaborative decision making. Idaho Power believes that with early coordination and consultation with Interested Parties, the more flexible TLP will allow Idaho Power to complete pre-filing requirements and ultimately file its subsequent license application in a timely manner. In fact, during the development of the PAD, Idaho Power discussed with several Interested Parties the relicensing process, the purpose of the PAD, our intent to use the TLP, reviewed resource information, and sought additional information to support the PAD development. No parties objected and no significant controversies were raised during these discussions. Idaho Power is not proposing to change the existing project facilities, and it is unlikely significant issues will be raised that cannot be resolved within the relicensing process timeframe.

### ***Complexity of the Resource Issues***

The Project's effects on resources are minimal. First, the Project is a relatively short transmission line (Line 925 is approximately 4.5 miles) and appurtenant facilities. There are no Project structures in a water body, and no water diversions for Project operation. The Project does not include a dam, reservoir, or power generation. The current FERC license includes no requirements for resource monitoring or the provision of recreational opportunities. Second, the archaeological, cultural, and historic built resources located on federally administered land within and near the Project boundary are well documented. The Project boundary's small footprint is not located on federally recognized Native American reservation lands. Also, no state or federally threatened or endangered species' critical habitat is present in the Project's area. Based on the location and characteristics of the Project, resource issues will likely be limited.

***Level of Anticipated Controversy***

As noted above, given the low complexity of the issues anticipated at the Project and the tenor of the pre-PAD consultation discussions with several Interested Parties, it seems unlikely that the relicensing process will create any significant controversy that cannot be overcome through a cooperative TLP process.

***Relative Cost of the TLP Compared to the ILP***

The flexible nature of the TLP will allow Idaho Power and Interested Parties to avoid the costs and other resource commitments needed to comply with the regimented requirements of the ILP. The TLP's flexible nature and timelines will allow Idaho Power to work cooperatively with Interested Parties to develop information necessary to resolve any issues that may arise in the relicensing. This flexibility will aid in consensus-building and reduce the relicensing timeline and associated costs.

***Amount of Available Information and Potential for Significant Disputes over Studies***

The PAD contains a considerable amount of existing information regarding resources associated with the Project. Idaho Power anticipates the combination of information in the PAD and the information developed from the implementation of any study plans will provide all the information needed for relicensing the Project. Therefore, Idaho Power contends the potential for significant disputes over studies is low.

***Other Pertinent Factors***

Other pertinent factors include (1) the Project is located downstream from a federal dam and the operation of the Project will not change under the new license or result in any material change to current storage, release, or flow regimes; (2) the operator of the power plant to which the Project is connected is pursuing relicensing currently (separately) and filed its NOI and PAD earlier this year and, so far, has not encountered significant controversy; and (3) a considerable amount of data and analysis exists for the Project that has been developed by Idaho Power over the term of the existing license and for this relicensing.

**COMMENTS ON REQUEST TO USE THE TLP**

As required by 18 C.F.R. § 5.3(d), any comments regarding Idaho Power's request to use the TLP must be filed with FERC within 30 days of this filing and must reference FERC Project No. 3104. Comments on the request to use the TLP should address, as appropriate to the circumstances of the request, the following considerations:

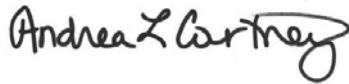
- Likelihood of timely license issuance;
- Complexity of the resource issues;

- Level of anticipated controversy;
- Relative cost of the traditional process compared to the integrated process;
- The amount of available information and potential for significant disputes over studies, and
- Other facts believed to be pertinent.

Comments must be sent to Idaho Power and the Secretary of the Commission with reference to FERC Project No. 3104. Comments sent to FERC must be submitted in accordance with the filing procedures posted on FERC's website at <http://www.ferc.gov>.

Idaho Power looks forward to working with FERC and Interested Parties during the relicensing of the Project. If you have any questions regarding the NOI, PAD, or request to use the TLP, please contact Andrea Courtney, Idaho Power's Hydro Licensing Lead, at (208) 388-2655 or [acourtney@idahopower.com](mailto:acourtney@idahopower.com).

Respectfully submitted,



Andrea L. Courtney  
Hydro Licensing Leader  
Idaho Power Company  
[ACourtney@idahopower.com](mailto:ACourtney@idahopower.com)  
(208) 388-2655

Encs.

Cc: Distribution List (see attached)

FERC – Office of Energy Projects & Office of General Counsel – Energy Projects

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the foregoing document with attachments to be served upon each person/entity designated on the attached distribution list for the Lucky Peak Transmission Line Project and to the FERC Offices of Energy Projects and General Counsel – Energy Projects.

Dated at Boise, ID this 30th day of May, 2025.

A handwritten signature in black ink that reads "Andrea L. Courtney". The signature is written in a cursive style and is positioned above a horizontal blue line.

Andrea L. Courtney  
Hydro Licensing Lead  
Idaho Power  
P.O. Box 70 (83707)  
1221 W. Idaho St.  
Boise, ID 83702  
(208) 388-2655  
[acourtney@idahopower.com](mailto:acourtney@idahopower.com)

Attachment A = NOI

Attachment B = Distribution List

Attachment C = proof of publication

Attachment D = PAD

**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION**

Idaho Power Company

Proj. No. 3104

**NOTICE OF INTENT OF IDAHO POWER COMPANY TO FILE AN APPLICATION FOR NEW LICENSE  
FOR THE LUCKY PEAK TRANSMISSION LINE PROJECT (FERC NO. 3104)**

Idaho Power Company (Idaho Power) hereby gives notice to the Federal Energy Regulatory Commission (FERC) of its intent to file an Application for New License for the Lucky Peak Transmission Line Project (FERC No. 3104). The current FERC license for the Lucky Peak Transmission Line Project was issued on June 30, 1981, to Idaho Power, and expires on May 31, 2030. Idaho Power intends to file an application for a new license no later than May 30, 2028.

Idaho Power requests that all correspondence and service documents relating to this notification and subsequent proceeding be addressed to:

Andrea L. Courtney, Hydro Licensing Leader  
Idaho Power Company  
P.O. Box 70 (83707)  
1221 West Idaho Street  
Boise, ID 83702  
[acourtney@idahopower.com](mailto:acourtney@idahopower.com)  
(208) 388-2655

Nathan Gardiner, Senior Counsel  
Idaho Power Company  
P.O. Box 70 (83707)  
1221 West Idaho Street  
Boise, ID 83702  
[ngardiner@idahopower.com](mailto:ngardiner@idahopower.com)  
(208) 388-2975

**(1) Existing licensee's name and address:**

Idaho Power Company  
1221 W. Idaho St.  
P.O. Box 70  
Boise, Idaho 83707

**(2) Project number**

FERC No. 3104

**(3) License expiration date:**

May 31, 2030

**(4) Unequivocal statement of intent to file an application for a new license:**

Idaho Power hereby declares its intent to file an Application for New License for the Lucky Peak Transmission Line (Project), FERC Project Number 3104.

**(5) Principal project works to be licensed:**

This Project is a Transmission Line – Only Project. The Project includes an approximately 4.5-mile long 138 kV transmission line that connects the Lucky Peak Hydroelectric Facility (FERC No. 2832) (not owned or operated by Idaho Power) to Idaho Power’s interconnected transmission system and appurtenant facilities. The transmission line is a primary line as defined by § 3(11) of the Federal Power Act, 16 U.S.C. § 796(11).

The Project features include a 3-phase, double-circuit, 138 kV transmission line, supported on primarily single pole vertical-type construction poles that crosses properties owned by Ada County and private parties and land managed by the U.S. Army Corps of Engineers and Bureau of Land Management.

**(6) Project location:**

The Project is in the State of Idaho, Ada County, about 10 miles southeast of the City of Boise, west and south of the Lucky Peak Reservoir.

**(7) Installed capacity:**

The Project is a transmission line and thus does not produce electricity.

**(8) Location where information required under 18 CFR § 16.7 is available to the public:**

This NOI and all other information filed with FERC related to this proceeding, including the Pre-Application Document, are available for public inspection and reproduction at Idaho Power’s central office, 1221 W. Idaho Street, Boise, Idaho 83702 during regular business hours (8:00 a.m. – 5:00 p.m., Monday through Friday).

The public is instructed to contact Andrea Courtney by telephone at (208)388-2655 or by email at [acourtney@idahopower.com](mailto:acourtney@idahopower.com) to make an appointment, request a digital copy, or review the information.

The documents filed with FERC can also be obtained from FERC’s e-Library filing system at <https://elibrary.ferc.gov/eLibrary/> by searching Docket P-3104.

**(9) Names and mailing addresses of**

**a. Every county in which the Project is located and any federal facilities used by the Project:**

The Lucky Peak Transmission Line is located entirely in Ada County, Idaho.

Ada County Clerk  
200 W. Front Street  
Boise, ID 83702

There are no federal facilities used by the Project.



**b. Every city, town, or similar local political subdivision in which the Project is located or that has a population of 5,000 or more people and is located within 15 miles of the project dam:**

The Lucky Peak Transmission Line is located within 15 miles of the City of Boise, which has a population of 5,000 or more people.

City of Boise  
150 N. Capitol Blvd.  
Boise, ID 83702

The Project does not include a dam.

**c. Every irrigation district, drainage district, or similar special purpose political subdivision in which the Project is located or that owns, operates, maintains, or uses any Project facility:**

The Lucky Peak Transmission Line is not located in any irrigation district, drainage district, or similar special purpose political subdivision. However, it is used by the Boise-Kuna, Nampa & Meridian, Wilder, and the Big Bend Irrigation Districts to transmit energy from the Lucky Peak Hydroelectric Project (FERC No. 2832) to Idaho Power's interconnected transmission system.

**d. Every other political subdivision in the general area of the Project that there is reason to believe would be likely to be interested in, or affected by, the notification:**

Idaho Power is unaware of any other political subdivision in the Project's general area that there is reason to believe would be likely to be interested in, or affected by, this notification.

**e. Affected Indian tribes:**

Shoshone-Bannock Tribes  
P.O. Box 306  
Fort Hall, ID 83203

Shoshone-Paiute Tribes  
P.O. Box 219  
Owyhee, NV 89832

**(10) Publication of Notice of Intent:**

Idaho Power published a notice of the filing of this NOI and PAD in the following daily newspaper of general circulation in the county in which the Project is located: The Idaho Press, 1618 N. Midland Blvd., Nampa, Idaho 83651 (208) 467-9251.

**(11) Request for non-federal representative status for consultation:**

Idaho Power requests that FERC authorize Idaho Power to initiate consultation under Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR § 800.2(c)(4). Idaho Power also requests that FERC designate Idaho Power as FERC's non-federal representative for purposes of consultation under Section 7 of the Endangered Species Act and the joint agency

regulations at 50 CFR Part 402, § 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act, and the implementing regulations at 50 CFR § 600.920.

**Attachment B. Lucky Peak Transmission Line Distribution List****Federal Agencies**

Debbie-Anne A. Reese Secretary Federal Energy Regulatory Commission 888 First Street N.E., Room 1A Washington, DC 20426	Douglas Johnson Regional Engineer Federal Energy Regulatory Commission Portland Regional Office 1201 NE Lloyd Blvd, Suite 750 Portland, OR 97232 <a href="mailto:Douglas.johnson@ferc.gov">Douglas.johnson@ferc.gov</a>
David Turner Branch Chief Federal Energy Regulatory Commission 888 First Street N.E. Washington, DC 20426 <a href="mailto:David.turner@ferc.gov">David.turner@ferc.gov</a>	Golbahar Mirhosseini Project Manager/Environmental Engineer Federal Energy Regulatory Commission 888 First Street N.E. Washington, DC 20426 <a href="mailto:Golbahar.mirhosseini@ferc.gov">Golbahar.mirhosseini@ferc.gov</a>
Erin Kenison Hydropower Branch Chief U.S. Fish and Wildlife Service 1387 S. Vinnell Way Boise, ID 83709 <a href="mailto:Erin_kenison@fws.gov">Erin_kenison@fws.gov</a>	Kelsey Swieca NOAA Fisheries West Coast Region, Interior Columbia Basin Office 1201 NE Lloyd Blvd, Suite 1100 Portland, OR 97232 <a href="mailto:Kelsey.swieca@noaa.gov">Kelsey.swieca@noaa.gov</a>
Jonathan Beck Boise District Manager Bureau of Land Management Four Rivers Field Office 3948 Development Ave. Boise, ID 83705 <a href="mailto:jbeck@blm.gov">jbeck@blm.gov</a>	Rebecca Lazdauskas ROW/FERC Lead Bureau of Land Management State Office 1387 S. Vinnell Way Boise, ID 83709 <a href="mailto:rlazdauskas@blm.gov">rlazdauskas@blm.gov</a>
Christopher Silbernagel Operations Project Manager U.S. Army Corps of Engineers Lucky Peak Dam and Lake 9723 E. Highway 21 Boise, ID 83716 <a href="mailto:Christopher.a.silbernagel@usace.army.mil">Christopher.a.silbernagel@usace.army.mil</a>	Emma Pokon Regional Administrator U.S. Environmental Protection Agency Region 10, Pacific Northwest 1200 6 <sup>th</sup> Avenue Seattle, WA 98101 <a href="mailto:Pokon.emma@epa.gov">Pokon.emma@epa.gov</a>

Reid Nelson Executive Director Advisory Council on Historic Preservation 401 F Street N.W., Suite 308 Washington, DC 20001 <a href="mailto:rnelson@achp.gov">rnelson@achp.gov</a>	Christopher Mebane Deputy Center Director Idaho Water Science Center U.S. Geological Survey 230 Collins Rd. Boise, ID 83702-4520 <a href="mailto:cmebane@usgs.gov">cmebane@usgs.gov</a>
Bureau of Reclamation Columbia-Pacific NW Regional Office 1150 N. Curtis Rd., Suite 100 Boise, ID 83706 <a href="mailto:pninfo@usbr.gov">pninfo@usbr.gov</a>	

### State and Federal Senators and Representatives

Senator Mike Crapo 250 E. Front St., Suite 205 Boise, ID 83702  239 Dirksen Senate Office Building Washington, DC 20510	Senator James Risch 350 N. 9 <sup>th</sup> St., Suite 302 Boise, ID 83702  483 Russell Senate Office Building Washington, DC 20510
Representative Mike Simpson 802 W. Bannock, Suite 600 Boise, ID 83702  2084 Rayburn HOB Washington, DC 20515	Janie Ward-Engelking Idaho State Senator 3578 S Crosspoint Ave. Boise, ID 83706 <a href="mailto:jwardengelking@senate.idaho.gov">jwardengelking@senate.idaho.gov</a>
Brooke Green Idaho State Representative 3727 E. Shady Glen Dr. Boise, ID 83706 <a href="mailto:bgreen@house.idaho.gov">bgreen@house.idaho.gov</a>	Ilana Rubel Idaho State Representative 2750 Migratory Dr. Boise, ID 83706 <a href="mailto:lrubel@house.idaho.gov">lrubel@house.idaho.gov</a>

### State Government and Agencies

Idaho Office of the Governor State Capitol P.O. Box 83720 Boise, ID 83720 <a href="mailto:governor@gov.idaho.gov">governor@gov.idaho.gov</a>	Susan Buxton Director Idaho Department of Parks & Recreation 5657 E. Warm Springs Ave. Boise, ID 83702 <a href="mailto:Susan.buxton@idpr.idaho.gov">Susan.buxton@idpr.idaho.gov</a>
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<p>Tambra Phares 401 Certification Lead Idaho Department of Environmental Quality 1410 N. Hilton St. Boise, ID 83706 <a href="mailto:Tambra.phares@deq.idaho.gov">Tambra.phares@deq.idaho.gov</a></p>	<p>Mat Weaver Director Idaho Department of Water Resources P.O. Box 83720 Boise, ID 83720-0098 <a href="mailto:idwrinfo@idwr.idaho.gov">idwrinfo@idwr.idaho.gov</a></p>
<p>Cally Younger Administrator Office of Energy and Mineral Resources P.O. Box 83720 Boise, ID 83720-0199 <a href="mailto:Cally.younger@oer.idaho.gov">Cally.younger@oer.idaho.gov</a></p>	<p>Jim Fredericks Director Idaho Department of Fish and Game 600 S. Walnut St. Boise, ID 83712 <a href="mailto:Jim.fredericks@idfg.idaho.gov">Jim.fredericks@idfg.idaho.gov</a></p>
<p>Dustin Miller Director Idaho Department of Lands 300 N. 6<sup>th</sup> St., Suite 103 Boise, ID 83702 <a href="mailto:dmiller@idl.state.id.us">dmiller@idl.state.id.us</a></p>	<p>Tom Bassista Technical Assistance Program Coordinator Idaho Department of Fish and Game 600 S. Walnut St. Boise, ID 83712 <a href="mailto:Tom.bassista@idfg.idaho.gov">Tom.bassista@idfg.idaho.gov</a></p>
<p>Monica Barrios-Sanchez Commission Secretary Idaho Public Utilities Commission P.O. Box 83720 Boise, ID 83720-0074 <a href="mailto:secretary@puc.idaho.gov">secretary@puc.idaho.gov</a></p>	<p>Chris Shaver Archaeologist Idaho State Historic Preservation Office 210 Main Street Boise, ID 83702 <a href="mailto:Chris.shaver@ishs.idaho.gov">Chris.shaver@ishs.idaho.gov</a></p>

### Counties and Municipal Government

<p>Lauren McLean Mayor City of Boise 150 N. Capitol Blvd. Boise, ID 83702 <a href="mailto:mayormclean@cityofboise.org">mayormclean@cityofboise.org</a></p>	<p>Tom Dayley Commissioner, District 3 Ada County 200 W. Front St., 3<sup>rd</sup> Floor Boise, ID 83702 <a href="mailto:Bocc1@adacounty.id.gov">Bocc1@adacounty.id.gov</a></p>
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### Native American Tribes

<p>Lee Juan Tendoy Chairman Shoshone-Bannock Tribes P.O. Box 306 Fort Hall, ID 83203 <a href="mailto:ltyle@sbtribes.com">ltyle@sbtribes.com</a></p>	<p>Carolyn Smith Cultural Resources Coordinator Shoshone-Bannock Tribes P.O. Box 306 Fort Hall, ID 83203 <a href="mailto:csmith@sbtribes.com">csmith@sbtribes.com</a></p>
<p>Louise Dixey Cultural Resources Director Shoshone-Bannock Tribes P.O. Box 306 Fort Hall, ID 83203 <a href="mailto:ledixey@sbtribes.com">ledixey@sbtribes.com</a></p>	<p>Brian Mason Chairman Shoshone-Paiute Tribes P.O. Box 219 Owyhee, NV 89832 <a href="mailto:Mason.brian@shopai.org">Mason.brian@shopai.org</a></p>
<p>Jade Roubideaux Cultural Preservation Director Shoshone-Paiute Tribes P.O. Box 219 Owyhee, NV 89832 <a href="mailto:Roubideaux.jade@shopai.org">Roubideaux.jade@shopai.org</a></p>	

### Organizations

<p>Sarah Higer Hydropower License Manager Lucky Peak Power Plant Project 9731 E. Highway 21 Boise, ID 83716 <a href="mailto:sarah@luckypeakpower.org">sarah@luckypeakpower.org</a></p>	<p>Justin Hayes Executive Director Idaho Conservation League P.O. Box 844 Boise, ID 83701 <a href="mailto:jhayes@idahoconservation.org">jhayes@idahoconservation.org</a></p>
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**AFFIDAVIT OF PUBLICATION  
STATE OF IDAHO**

**County of Canyon and Ada**

91694 635592

IDAHO POWER CORPORATE COMMUNICA-  
TIONS

1221 W IDAHO STREET  
Boise, ID 83707

**SHARON JESSEN**

***of the State of Idaho, being of first duly sworn, deposes  
and says:***

- 1. That I am a citizen of the United States, and at all times hereinafter mentioned was over the age of eighteen years, and not a party to the above entitled action.*
- 2. That I am the Principle Clerk of the Idaho Press-Tribune, a daily newspaper published in the Counties of Canyon and Ada, State of Idaho; that the said newspaper is in general circulation in the said counties of Canyon and Ada, and in the vicinity of Nampa, Caldwell, and Boise, and has been uninterruptedly published in said Counties during a period of seventy -eight consecutive weeks prior to the first publication of this notice, a copy of which is hereto attached.*
- 3. That the notice, of which the annexed is a printed copy, was published in said newspaper and on IdahoPublicNotices.com 1 time(s) in the regular and entire issue of said paper, and was printed in the newspaper proper, and not in a supplement*

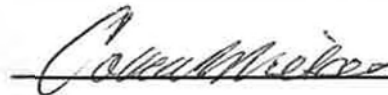
*That said notice was published the following: 05/19/2025*



SHARON JESSEN  
STATE OF IDAHO



*On this 22nd day of May, in the year of 2025 before me a Notary Public, personally appeared. SHARON JESSEN, known or identified to me to be the person whose name is subscribed to the within instrument, and being by me first duly sworn, declared that the statements therein are true, and acknowledge to me that he/she executed the same.*



Notary Public of Idaho  
My commission expires

**LEGAL NOTICE**

**Federal Energy Regulatory Commission  
Idaho Power Company  
Lucky Peak Transmission Line  
FERC Project No. 3104**

Idaho Power Company (IPC) is filing a Notice of Intent (NOi), a Preliminary Application Document (PAD), and a Request to use the Traditional Licensing Process (TLP) with the Federal Energy Regulatory Commission (FERC or Commission) for the Lucky Peak Transmission Line Project (Project) (FERG No. 3104). IPC is publishing notice of these filings and making the following information available to the public:

**Summary of Documents**

1. The NOi will be filed on or before May 31, 2025. The NOi notifies FERG of IPC's unequivocal intent to prepare and file an application for new license for the Project.

2. The PAD will be filed on or before May 31, 2025. The PAD provides existing and reasonably available information about the existing Project, including relevant engineering, environmental, operational, and economic information.

3. The Request to use the TLP will be filed on or before May 31, 2025. The Request to use the TLP, if granted, will allow IPC to proceed pursuant to 18 CFR Part 16. IPC's Request to use the TLP is based upon informal consultation with potentially interested parties that did not reveal any potential significant controversies, and IPC believes the TLP provides the best opportunity to engage in a timely and efficient licensing process.

**Inspection and Reproduction**

The NOi, PAD, and Request to use the TLP, and associated materials, will be available for inspection and reproduction online at [ferc.gov/docs-filing/elibrary.asp](http://ferc.gov/docs-filing/elibrary.asp) by searching under docket P-3104. They will also be available for inspection during regular business hours at IPC's headquarters at the address below.

**Applicant's Contact Information**

Andrea Courtney  
P.O. Box 70  
1221 W. Idaho Street  
Boise, Idaho 83707  
Phone: (208) 388-2655  
Email: [acourtney@idahopower.com](mailto:acourtney@idahopower.com)

**Location of Project and Type of Facilities**

The Project is a constructed transmission line, approximately 4.51 miles long, located approximately 10 miles southeast of the City of Boise, Idaho.

**Comments on Request to Use the TLP**

Comments on IPC's Request to use the TLP are due to the Commission and IPC no later than 30 days following the filing date of the Request to use the TLP and must reference FERG Project No. 3104. Comments on IPC's Request to use the TLP should address, as appropriate to the circumstances of the request, the (a) likelihood of timely license issuance; (b) complexity of the resource issues; (c) level of anticipated controversy; (d) relative cost of the traditional process compared to the integrated process; (e) the amount of available information and potential for significant disputes over studies, and (f) other factors believed by the commenter to be pertinent.

Any comments must be submitted to the Secretary of the Commission in accordance with filing procedures posted on the Commission's website at <http://www.ferc.gov>.

May 19, 2025

635592







# Lucky Peak Transmission Line Project

**Andrea Courtney**  
Hydro Licensing Leader

**Idaho Power Company Pre-Application  
Document (PAD)**

**FERC Project No. 3104**

**May 2025**

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## List of Acronyms and Abbreviations

Acronym	Definition
ALP	Alternative licensing process
AMSL	Above mean sea level
APLIC	Avian Power Line Interaction Committee
BCC	Bird species of conservation concern
BLM	Bureau of Land Management
CEII	Critical Energy Infrastructure Information
CFR	Code of Federal Regulations
COLD	Cold-Water Aquatic Life
DEQ	Idaho Department of Environmental Quality
DWS	Drinking water supply
EPA	U.S. Environmental Protection Agency
ESA	<i>Endangered Species Act</i>
FERC	Federal Energy Regulatory Commission
FLA	Final License Application
FR	Federal Register
Ha	Hectare
HUC	Hydrologic Unit Code
IDFG	Idaho Department of Fish and Game
IDL	Idaho Department of Labor
IFWIS	IDFG's Idaho Fish and Wildlife Information System
ILP	Integrated licensing process
IpAC	USFWS Information for Planning and Consultation
kV	kilovolt
m	meter
NOI	Notice of Intent
NRCS	National Resources Conservation Service
NRHP	National Register of Historic Places
NTU	Nephelometric Turbidity Unit
PAD	Pre-Application Document
PCR	Primary Contact Recreation
pH	Hydrogen ion concentration
Project	Lucky Peak Transmission Line 925, FERC Project No. 3104
ROW	Right of way
SCR	Secondary Contact Recreation
SHPO	Idaho State Historic Preservation Office

Acronym	Definition
TDG	Total dissolved gas
TLP	Traditional licensing process
U.S.	United States
USACE	U. S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service



# 1. Introduction

## 1.1. Project Background and Purpose

Idaho Power Company (Idaho Power) is filing with the Federal Energy Regulatory Commission (FERC or Commission) its notification of intent (NOI) to relicense and the required Pre-Application Document (PAD) for the Lucky Peak Transmission Line Project (FERC No. 3104) (Project). Idaho Power is the owner and operator of the Project and holds the existing FERC license, which expires May 31, 2030. The Project's current license is included as Exhibit A.

The Project is an approximately 4.5-mile long, 138-kilovolt (kV) transmission line that connects the Lucky Peak Hydroelectric Facility (FERC No. 2832) to Idaho Power's Lower Malad–Boise Bench 138-kV transmission line and appurtenant facilities. The Lucky Peak Hydroelectric Facility utilizes the Lucky Peak Dam, owned and operated by the U.S. Army Corps of Engineers (USACE), to generate electricity from the Boise River. The dam was built in the 1950s by the USACE for flood control and irrigation purposes. To be clear, Idaho Power's Project is the transmission line only—not the dam, reservoir, or the power plant. The Project is in Ada County, Idaho, about 10 miles southeast of the City of Boise.

Idaho Power submits this PAD pursuant to Title 18 §§ 5.6 and 16.8 of the U.S. Code of Federal Regulations (CFR). This PAD accompanies Idaho Power's NOI to seek a subsequent license for the Project. Idaho Power is distributing this PAD and NOI simultaneously to federal and state resource agencies, local governments, Native American tribes, members of the public, and others interested in the relicensing proceeding (Interested Parties). The purpose of the PAD is to provide existing information relevant to the Project in Idaho Power's possession or that Idaho Power can obtain with the exercise of due diligence.

In developing this PAD, Idaho Power reviewed existing internal and external data relevant to the Project and contacted several entities which might be interested in the Project. In the discussions, Idaho Power reviewed the licensing process and schedule, discussed substantive issues, and sought additional information relevant to the Project. No significant controversies were raised in those meetings. Idaho Power also reviewed federal and state comprehensive plans filed with FERC for additional information relevant to the Project.

## 2. Process Plan and Schedule (18 CFR § 5.6(d)(1))

The process plan and schedule were developed to provide all parties with an understanding of what to expect during the relicensing process, such as public meetings, time frames for gathering information, submitting comments, developing and conducting studies, obtaining any necessary permits, and completing all pre-filing licensing activities.

## 2.1. Request to Use the Traditional Licensing Process

FERC's Integrated Licensing Process (ILP) is the default licensing process for applicants filing an NOI and PAD. Applicants seeking to use either the Traditional Licensing Process (TLP) or the Alternative Licensing Process (ALP) must file a request and receive approval from FERC to do so. Concurrent with the filing of this PAD and pursuant to 18 CFR § 5.3(b), Idaho Power requests FERC's approval for using the TLP. FERC's regulations at 18 CFR § 5.3(c)(1)(i)–(ii) require an applicant to justify the request and address six factors. Idaho Power examines the six factors in its cover letter to the NOI. Idaho Power expects the Project's relicensing to be non-controversial, require few studies, and have relatively non-complex resource issues.

## 2.2. Comments on Idaho Power's Request to Use the TLP

As required by 18 CFR § 5.3(d), any comments in response to Idaho Power's request to use the TLP must be filed with FERC within thirty (30) days of this filing and must reference FERC Project No. 3104. Comments must be sent to Idaho Power and the Secretary of the Commission. Comments sent to FERC must be submitted in accordance with the filing procedures posted on FERC's website at [ferc.gov](https://www.ferc.gov). Comments should address, as appropriate to the circumstances of the request, all the following considerations:

- Likelihood of timely license issuance
- Complexity of the resource issues
- Level of anticipated controversy
- Relative cost of the traditional process compared to the integrated process
- Amount of available information and potential for significant disputes over studies
- Other factors believed to be pertinent

Idaho Power looks forward to working with FERC and the Interested Parties during the relicensing of the Project.

## 2.3. Relicensing Schedule, Scoping Meeting, and Site Visit

The proposed process plan and schedule for the Project set forth in the following was developed consistent with FERC's regulations at 18 CFR §§ 5.6-5.8 and 16.8. The proposed schedule provides each of the major pre-filing relicensing activities in the TLP, the party responsible for implementation of the activity, and the deadline for each activity. The deadlines included in the proposed schedule identify the timeframe by which each activity must be completed to comply with FERC's regulations. However, the schedule is subject to change,

as some activities may be completed early, and certain activities are dependent on the completion of other activities.

Following the filing of the NOI, PAD, and request to use the TLP, FERC will publicly notice the documents. Comments on Idaho Power's request to use the TLP are due within 30 days of this filing. If FERC approves Idaho Power's TLP request, as set forth in 18 CFR § 16.8(b)(3)(ii), a joint meeting with Interested Parties and an opportunity for a Project site visit will be held no earlier than 30 days, but no later than 60 days, following the date FERC authorizes use of the TLP. The joint meeting will allow Interested Parties to understand existing resource conditions and participate in a question-and-answer session with Idaho Power regarding the Project. The Project site visit is an opportunity to tour the Project. Table 1 provides a draft schedule of the pre-filing process.

**Table 1**

Lucky Peak Transmission Line Project—anticipated pre-filing relicensing schedule

18 CFR	Activity	Responsibility	Time Frame
§ 5.6(b)(2)	PAD due diligence	Idaho Power	June 2024–May 2025
§§ 5.3, 5.5, 5.6, 16.6(b), 16.7(d)	File NOI, PAD, TLP Request, and Request to be FERC's non-federal representative for informal <i>Endangered Species Act</i> (ESA) and <i>National Historic Preservation Act</i> (NHPA) consultation, and publish public notice in newspaper	Idaho Power	5 to 5.5 years prior to license expiration
§ 5.3(d)(1)	Comments on TLP Request	Interested parties	Within 30 days of TLP Request submittal
§ 5.7	Meeting with potentially affected Native American tribes	FERC	No later than 30 days after filing of NOI and PAD
§ 5.8	Issue Public Notice of NOI, PAD, and decision on TLP request and non-federal representation designation	FERC	Within 60 days of NOI, PAD, and TLP Request submittal
§§ 16.8(b)(3)(i)(B), 16.8(i)(1)	Notify FERC of joint meeting and site visit and publish notice in newspaper	Idaho Power	At least 15 days in advance of joint meeting
§ 16.8(b)(3)(ii)	Joint Meeting for Consultation with Interested Parties at Idaho Power (1221 W. Idaho St., Boise, ID) and site visit	Idaho Power, Interested parties, FERC	Within 30 to 60 days of FERC's Approval of TLP Request = September 5, 2025
§ 16.8(b)(5)	Comments on PAD and submit study requests	Interested parties	Within 60 days of joint meeting
§ 16.8(c)(1)	Develop study plans	Idaho Power	Following receipt of PAD comments and study requests
§ 16.8(c)(1)	Conduct field studies	Idaho Power	Following development of study plans

18 CFR	Activity	Responsibility	Time Frame
§16.8(c)(4)	Distribute Draft License Application (DLA) with study results to Interested Parties	Idaho Power	Following conclusion of studies
§ 16.8(c)(5)	Comments on study results and DLA	Interested parties	90-day comment period
§§ 16.2(b), 16.8(d)(1)	Develop Final License Application (FLA) and file with FERC	Idaho Power	No later than 2 years before current license expires

## 2.4. Communications and Distribution Protocols

Idaho Power’s goal is to maintain open communications and provide public access to relevant relicensing information. Idaho Power anticipates the distribution of primary relicensing documents, submittal of comments, and correspondence to be largely conducted electronically, either by electronic filing of documents with FERC or via email distribution. Idaho Power will also maintain a webpage dedicated to the Project’s relicensing where all public documents will be accessible. This website can be accessed two ways: 1) go to [idahopower.com/relicensing](http://idahopower.com/relicensing) or 2) search for the term “relicensing” on Idaho Power’s homepage search bar at [idahopower.com](http://idahopower.com).

Relicensing documents will also be available through FERC’s eLibrary, an online records information system that contains documents submitted to and issued by FERC. The eLibrary can be accessed through FERC’s homepage at [ferc.gov](http://ferc.gov). Documents filed with FERC as part of the Project’s relicensing are available for viewing and printing via eLibrary by searching under the Project’s docket P-3104. Those interested can subscribe to docket P-3104 using eSubscription on FERC’s website to receive notices of issuances and filings by email.

Hard copies of the NOI and PAD are available for review at Idaho Power Company, 1221 West Idaho Street, Boise, Idaho 83702. Any requests for hard copies of relicensing documentation should be sent to Andrea Courtney, Hydro Licensing Lead, P.O. Box 70, Boise, Idaho 83707 or by email to [acourtney@idahopower.com](mailto:acourtney@idahopower.com). These requests must clearly indicate the document name, publication date, and reference FERC Project No. 3104. A reproduction charge and postage costs may be assessed for hard copies requested by the public.

Idaho Power also developed a distribution list of federal and state resource agencies, Native American tribes, local governments, irrigation districts, non-governmental organizations, and other parties likely to be interested in the Project relicensing. This list will be used to distribute electronic copies of major relicensing documents and will be updated with additions and modifications, upon request.

## 2.5. Interested Parties' Communications with FERC

All communications to FERC must reference the *Lucky Peak Transmission Line Project FERC No. 3104 – Application for New License* clearly on the first page and must conform to FERC's Rules of Practice and Procedure. Any hard copy filings with FERC must be provided to Idaho Power and all other entities listed on FERC's Official Service List for the Project.

FERC strongly encourages electronic filing of comments and interventions through its eFiling or eComments systems. Information and links to these systems can be found at the FERC webpage [ferc.gov/docs-filing/ferconline.asp](http://ferc.gov/docs-filing/ferconline.asp). To eFile comments and/or interventions, interested parties must have an eRegistration account. After preparing the comment or motion to intervene, go to [ferc.gov](http://ferc.gov) and select the eFiling link; select the new user option, and follow the prompts. Users are required to validate their account by accessing the site through a hyperlink sent to the registered email account.

An alternative method to eFile comments is through the "Quick Comment" system available via a hyperlink on FERC's homepage. "Quick Comments" do not require users to have a subscription, the comments are limited to 6,000 characters, and all information will be public. Commenters are required to enter their name and email address when providing "Quick Comments." Commenters will receive an email with detailed instructions on how to submit "Quick Comments."

Relicensing participants without internet access may submit comments to FERC at the address below via hard copy, but should be aware that documents sent to FERC by regular mail can be subject to docket-posting delays:

Debbie-Anne Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

## 2.6. Sensitive Information

Certain documents may be restricted from public access in accordance with FERC's regulations protecting Critical Energy Infrastructure Information ([CEII] 18 CFR § 388.113) or in cases where the document contains sensitive information (e.g., cultural resource sites) (18 CFR § 388.112(b)). Idaho Power will address requests for such information on a case-by-case basis and in accordance with applicable laws, throughout the relicensing process.

### 3. Project Location, Facilities, and Operations (18 CFR § 5.6(d)(2))

The Project is wholly located in Ada County, Idaho, 10 miles southeast of the city of Boise.

#### 3.1. Contact Information

The following individuals are authorized to act on behalf of Idaho Power for this Project's relicensing:

**Andrea Courtney**

Hydro License Leader

P.O. Box 70 (83707)

1221 W. Idaho St.

Boise, ID 83702

acourtney@idahopower.com

(208) 388-2655

**Brett Dumas**

Director, Environmental Affairs

P.O. Box 70 (83707)

1221 W. Idaho St.

Boise, ID 83702

bdumas@idahopower.com

(208) 388-2330

**Nathan Gardiner**

Senior Counsel

P.O. Box 70 (83707)

1221 W. Idaho St.

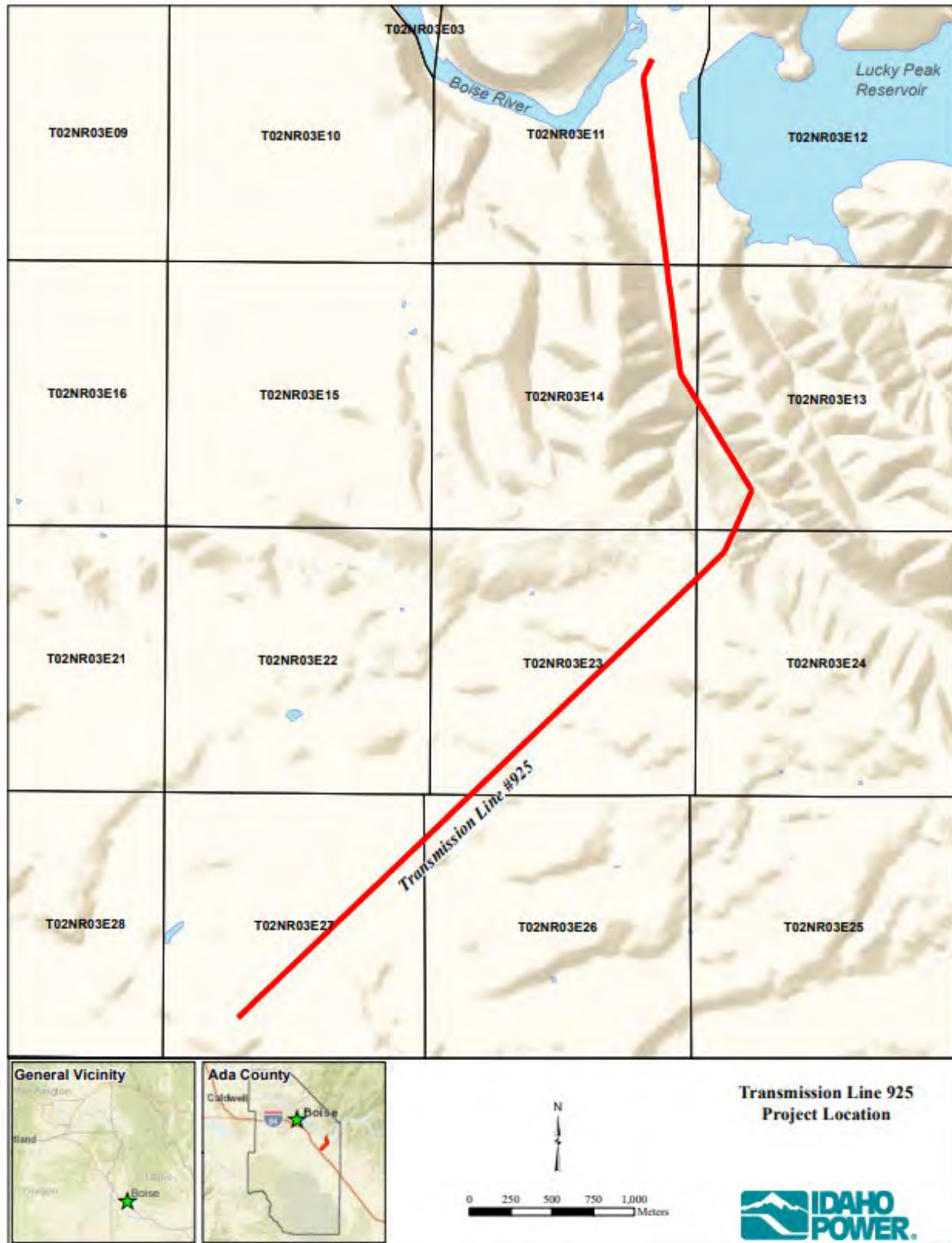
Boise, ID 83702

ngardiner@idahopower.com

(208) 388-2975

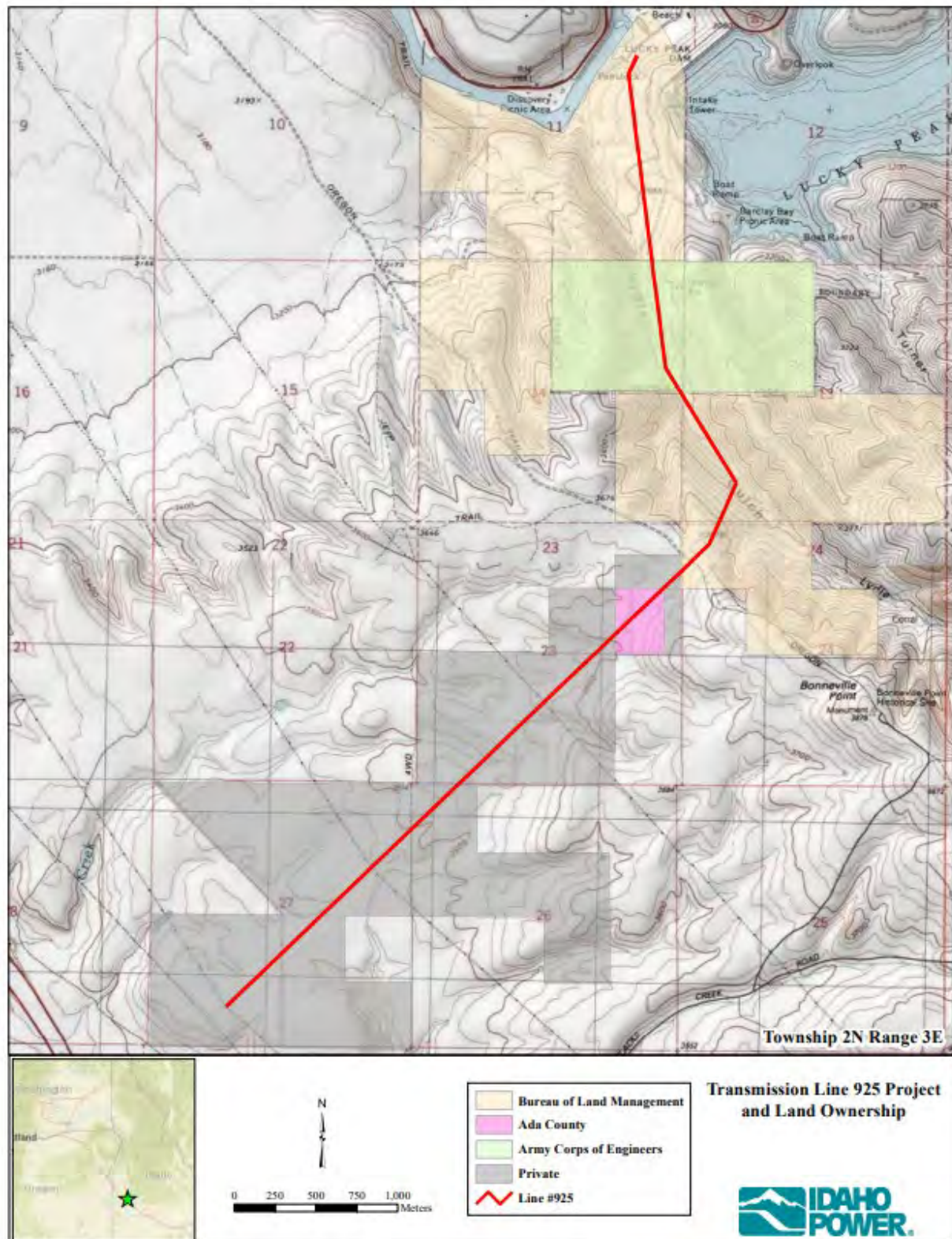
#### 3.2. Project Maps

Figures 1 and 2 show the lands of the general Project boundary and the lands and waters near the Project as well as land ownership within the Project boundary.



**Figure 1**  
Project location





**Figure 2**  
Land ownership along Project boundary



### 3.3. Detailed Description of Existing Facilities and Components

The Project is a primary transmission line (which Idaho Power has named Line 925) as defined by § 3(11) of the *Federal Power Act*, 16 U.S.C. § 796(11), consisting of a 3-phase, double-circuit, 138-kV transmission line, supported on single pole vertical-type construction towers.

The Project's 79 structures have an average height of 70 feet. The Project includes a switchyard. Figure 3 is a single-line diagram showing transfer of electricity from the switchyard to the transmission grid. Line 925 is approximately 4.5 miles long and connects the Lucky Peak Power Plant Project (FERC No. 2832), owned by a collection of irrigation districts and operated by Seattle City Light, to Idaho Power's Lower Malad–Boise Bench 138-kV transmission line from Structure 47 to Structure 48 (on Idaho Power's Line 410). The Project boundary is Line 925 plus a right of way (ROW) on either side of the line. The line was built and went into service in 1987. The line crosses lands owned by private parties and Ada County and lands administered by the USACE and the Bureau of Land Management (BLM).

This Project is a transmission line only. Idaho Power does not own or operate the reservoir, dam, spillway, penstocks, canal, powerhouse, tailrace, turbines, or the generators, etc. for the power generation. Therefore, Idaho Power does not control the ramping rates, flushing flows, reservoir operations, or flood control operations.

Figures 4 and 5 show representative types of the Project structures.

**Figure 3**

Single-line diagram

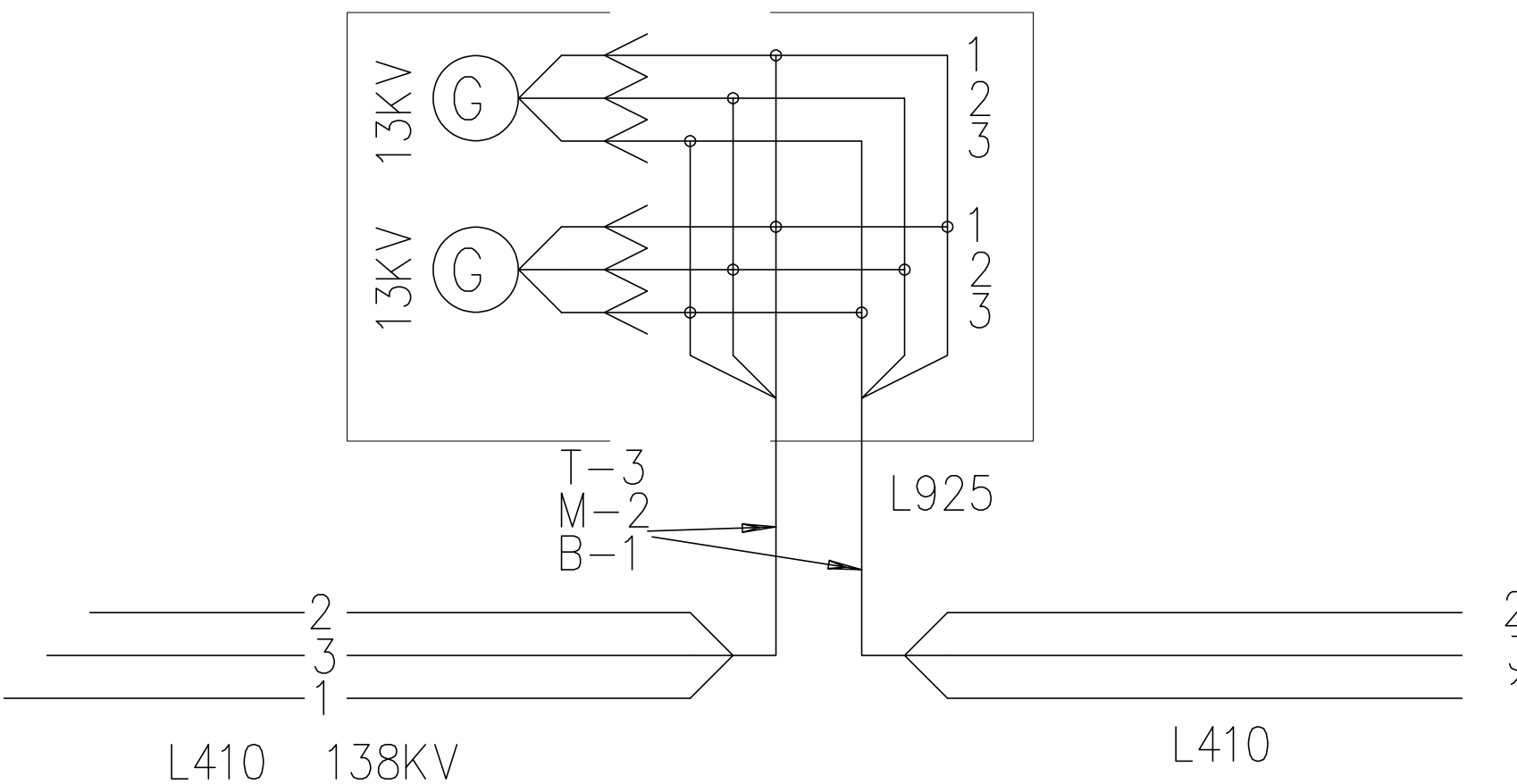
3-31-11 Delete dual circuits connection coming out of Cloverdale. SSC  
3-6-11-15 Updated Bowmont Substation - Lines 479 and 920. ECH

01-25-06	Added Eckert Tap	th
02-02-06	Corrected Kuna Tap	th
04-24-06	Added L465 Zilog now 138KV	th
04-24-06	Updated Phasing Map	
06-05-06	Updated Phasing Map	
06-19-06	Added Happy Valley Station	
01-09-07	Corrected Phasing L438 Cloverdale	
08-24-10	Added L466 Bethel Court to Victor	
03-26-11		

10-13-03	ADDED MIDROSE TAP & STATION.	th
11-25-03	ADDED VALLUE TAP & STATION.	SPV
01-01-04	RENUMBER LINE 475, VALLUE TAP.	reh
12-01-04	ADD TEN MILE SUB.	th
04-05-05	REVISED LINE 920 TO 475	mln
10-12-05	Added Line 467 BTLR-WYEE	th
01-25-05	Added L464 Eagle- Star	th

12-13-01 CORR. PHASING ● L712 CLOVERLEAF AND GOWEN TAP S21A th  
12-13-01 BROKE L438 ● LOCUST SUB, LABLED L459 LOCUST TO BLACKCAT.  
1-4-01 ADDED JOPLIN SUB.  
9-19-01 ADDED JOPLIN SUB.  
3-1-02 L402 (1.38kv) now 715 (230kv) th  
3-1-02 L438 Added Standard Sub & 2nd boy ● Locust. th  
11-3-02 L438 Added KUNA, th  
01-06-03 Moved BORT & WYEE TO 1.38kv SHI. WAS 69KV, Added L466 th  
07-07-03 Added KUNA, th

SCL  
LUCKY PEAK  
138KV



LEGEND

T-TOP  
M-MIDDLE  
B-BOTTOM  
LLINE  
S-STRUCTURE

SEE SHEET 1 FOR UTILITY PHASING AND STRUCTURE DEFINITION

	04/06	SYSTEM PHASING DIAGRAM 138KV			
	01/06				
	10/05				
	04/05				
	12/04	CALDWELL TO BOISE BENCH			
10/15	11/03				
01/13	10/03	IDAHO POWER COMPANY BOISE, IDAHO			
08/11	07/03				
05/11	01/03	SCALE: NONE		DATE: 6-12-85	
08/10	11/02	DS.	APPROVED	23D-36589	
01/07	04/01	DR. RJB			
06/06	REV.	CH.	SHT.	8	39-2



**Figure 4**  
One of the representative vertical towers of Line 925





**Figure 5**  
Another representative vertical tower of Line 925

### 3.4. Description of Proposed Facilities and Components

In this relicensing, Idaho Power is not proposing any changes in Project operation, future development or rehabilitation, or new facilities/components be constructed.<sup>1</sup> And because Idaho Power does not control the reservoir, dam, or powerhouse, Idaho Power does not propose changes to those operations. The Lucky Peak Power Plant Project (FERC Project No. 2832) is proceeding in a separate relicensing with FERC.

### 3.5. Current License Requirements

FERC issued a license for the Project by order dated June 30, 1981, effective July 1, 1981, to May 31, 2030. The license is subject to the articles set in Form L-21 (Revised October 1975, 54 FPC 1923), entitled “Terms and Conditions of License for Unconstructed Transmission Line Project.” These terms and conditions, designated as Articles 1 through 15, are made a part of the license. The license is also subject to the following special conditions set forth in Table 2 as additional articles.

**Table 2**  
Current Project license requirements

Article No.	Description
16	Pay the U.S. annual charge to reimburse the U.S. for the cost of administration of Part I of the <i>Federal Power Act</i> (FPA) and for use of federal lands.
17	File approval for Exhibits J, K, and M within one year of project operation.
18	Consult with U.S. Fish and Wildlife Service (USFWS) and Idaho Department of Fish and Game (IDFG) to prepare and file with FERC at least 60 days before construction a plan to minimize adverse impacts on raptors from construction and operation of the transmission line.
19	Consult with USFWS, and at least 60 days before any ground-disturbing activity, file a report with FERC stating results of plant survey prepared by a professional botanist to identify the presence, if any, of <i>Primula cusickiana</i> . The report shall include protection measures to be implemented.
20	Protect identified archaeological sites from construction-related activities; when new sites are observed, halt work, consult with the State Historic Preservation Office (SHPO), and develop a mitigation plan.
21	Retain authority to grant permission for certain uses of project lands and waters and to convey certain interests in project lands and waters both with and without prior FERC approval; exercise such authority as consistent with protecting and enhancing the scenic, recreational, and other environmental values of the project; supervise and control those uses and occupancies for which it granted permission; take lawful action if necessary to correct a violation.

<sup>1</sup> Idaho Power is scheduled to replace the structures within the Project to harden the grid, a proceeding that is separate from this relicensing. Anticipated work will be completed before Idaho Power’s FLA in this relicensing will be submitted. Idaho Power will address any updates to the Project description in the FLA.

### **3.6. Summary of Project Generation and Outflow Records**

The Project is a transmission line only. The Project does not generate power, nor does it discharge to surface waters.

### **3.7. Current Net Investment**

Idaho Power estimates the Project's current value at \$882,567.50. The value should be not interpreted as the fair market value of the Project.

### **3.8. Compliance History of the Project**

To the best of Idaho Power's knowledge, Idaho Power is compliant with the terms and conditions of the existing license and there have been no violations.

## **4. Description of Existing Environment and Resource Impacts (18 CFR § 5.6(d)(3))**

### **4.1. Geology and soils (18 CFR § 5.6(d)(3)(ii))**

#### ***4.1.1. Description of Geological Features***

The Project is located at the far east end of the Boise Valley, where the Boise River transitions from being confined to a comparatively narrow V-shaped canyon to a broad floodplain bounded by the foothills of the Boise Ridge to the north and a sequence of named river terraces to the south. Basalt flows commonly seen throughout southern Idaho are also layered among the river terraces (Othberg et al. 1996). Some of the basalt flows filled paleo-channels of the Boise River and its tributaries and were later eroded as the river reclaimed its path, leaving behind occasional plateaus, flats, mesas, and giant isolated wedges of basalt clinging to the steep slopes of the original river channel of dissimilar bedrock (Maley 1987). This topographic transition and the geologic formations seen on the surrounding landscape represent the interface between the Atlanta Lobe of the Idaho Batholith and the Western Snake River Plain. To the north, the Idaho Batholith is a Cretaceous/Paleogene-aged granite/granodiorite plutonic body that is the foundation for most of central Idaho. The Western Snake River Plain is a broad rift valley that extends to the foothills of the Owyhee Mountains and has accumulated thousands of feet of basin fill sediments and numerous basalt flows as the floor of the rift gradually subsided (Wood and Clemens 2002). Some of the area basalt flows erupted below the surface of a lake (Lake Idaho) that once occupied the area between the Boise and Owyhee fronts (between 9 and 2 million years ago) and reached a maximum pool elevation of 3,800 feet above mean sea level (AMSL)—about 700 feet above the crest of Lucky Peak Dam (Othberg et al. 1996). After the lake emptied, the Boise River cut through and redeposited the lakebed

sediments and laid down extensive gravel deposits of largely granitic materials from the batholith, creating the numerous river terraces seen to the south and west.

The areas north of the Project are well known for the location of mineral resources of economic value such as gold and silver, which are commonly associated with sulfide minerals in igneous formations. In fact, the Euro-American history of the area was primarily driven by the quest for gold, which is seen in the ubiquitous remains of placer and hard rock mining operations throughout the region. Boise Basin to the north was home to numerous mining towns such as Placerville, Idaho City, Quartzburg, and Centerville – placer tailings are common along the banks of the Boise River, Mores Creek, Granite Creek, and Robie Creek, and hard rock tailings are visible on the steep slopes a few miles north of the dam. Being mainly composed of sands and gravels, the river terraces to the south are commercially valuable and contributed significantly to growth and development in the Boise Valley (Bliss and Moyle 2001). Additionally, the river itself played a profound role in regional agricultural development, timber harvest — and more recently, the generation of electricity. In short, the promise of gold drew miners to the area and the abundance of other resources allowed the Boise Valley to become a population center and regional hub of transportation, commerce, and industry — and ultimately, the state capitol.

The Project starts at the Lucky Peak powerhouse at an elevation of 2,940 feet AMSL and continues approximately 4.5 miles due south southwest, climbing 530 feet to its junction with Idaho Power's Line 410 at 3,460 feet AMSL (average slope of 2.2%). Over this distance, the line first follows Lydle Gulch south for 1.75 miles before turning to the southwest, climbing out of Lydle Gulch and crossing the comparatively low-relief area north of Blacks Creek Road. Although the landform was significantly altered by the construction of Lucky Peak Dam and powerhouse, Line 925 begins on what would have been the floodplain of the river and passes over deep, unconsolidated gravel deposits terminating on the Tenmile Terrace with most of the area capped by wind-blown silt.

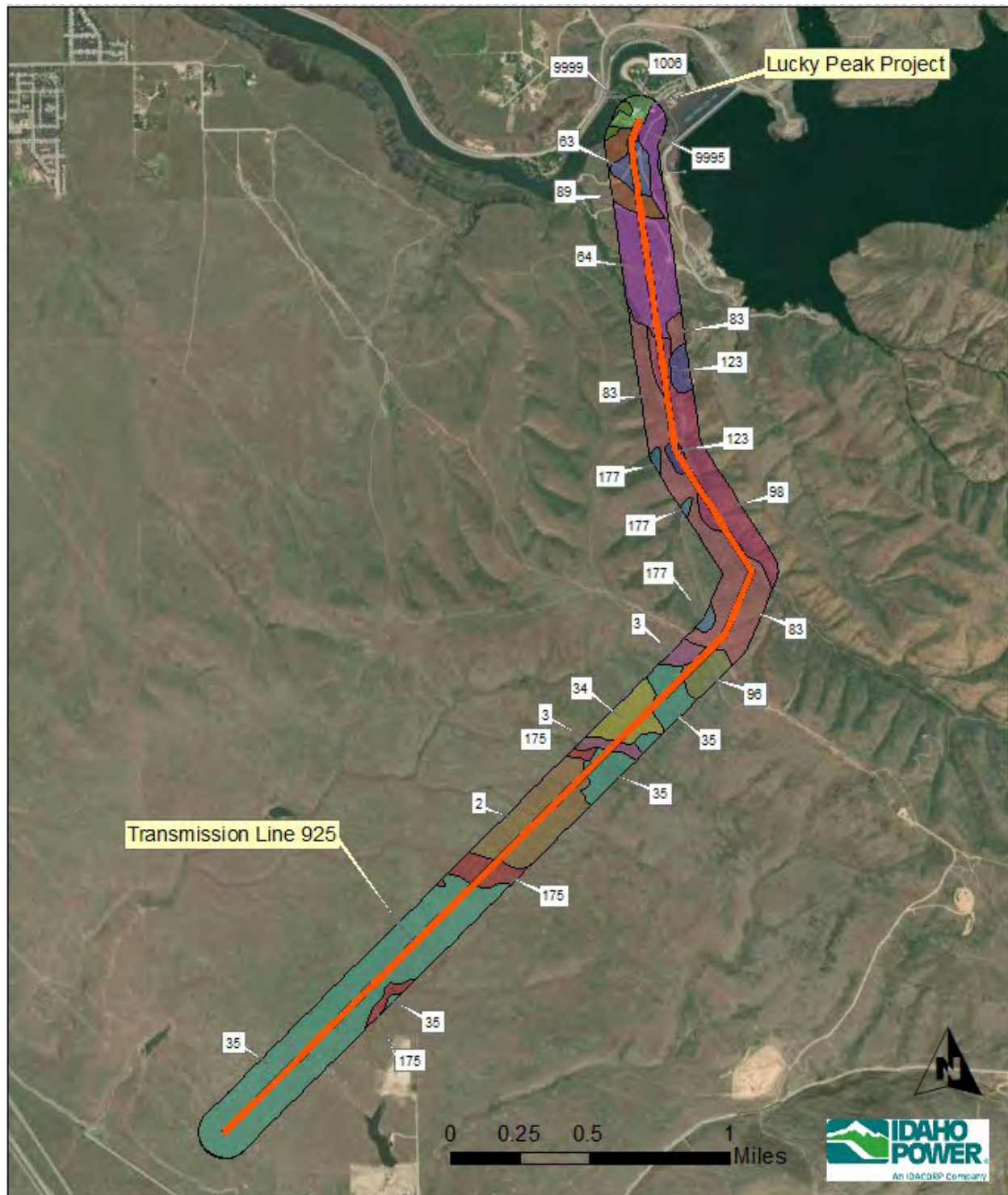
#### ***4.1.2. Description of Soil Types***

The Web Soil Survey of the National Resources Conservation Service (NRCS) has mapped 13 distinct soil types under Line 925 (see Figure 6 and Table 3) (NRCS 2025). In general, all are more alike than not, being gravely/sandy loams with gravels ranging from pebbles to cobbles and with varying silt/clay content. Additionally, all are characterized as residing on stream terraces and lava flow plains (Bliss and Moyle 2001). While most are derived from granitic parent material (Idaho Batholith) and composed of mixed alluvium, lacustrine deposits, and loess, a few also include volcanic ash, tuff, and basalt. Regardless, all reside on the gravels of Bonneville Point and the Tenmile Terrace of the Boise River and are well-drained; a few are classified as viable farmland.

In general, the terrace deposits and overlying soils are unconsolidated. The erodibility of the soils in the area is relative to various soil properties such as texture, organic matter content, soil structure, clast size, and permeability. However, actual soil loss is also dependent on



effective precipitation, ground cover, and slope length and gradient. As the soils of the area are all gravely/sandy loams with minimal organic materials and given the typical annual precipitation of 12 to 16 inches, they are generally resistant to erosion when located in areas of dense ground cover and minimal slope. Conversely, the same soils are less resistant to erosion when ground cover is sparse or absent in areas of greater slope — this is readily seen as rilling and gulling within area roadbeds on moderate-to-steep slopes. As such, the steeper slopes on the south side of Lydle Gulch have a moderate potential for erosion, as does the ephemeral watercourse of the gulch itself. The areas across the low-relief landscape between the rim of Lydle Gulch and Line 410 (near the I-84 Blacks Creek Exit) have a low potential for erosion. Additionally, soils with a higher silt content are more prone to erosion, while a higher clay content can result in increased resistance to erosion (NRCS 2025). While the gravel terraces are deeply incised by ravines and gullies, evidence of slope failures was not seen in the area. The Project area does not include any portion of the reservoir shoreline, nor the bed or banks of the Boise River.



**Figure 6**  
NRCS mapped soil types (labeled) with respect to the Lucky Peak Project and Transmission Line 925  
(NRCS 2025)

**Table 3**

NRCS mapped soils along the 4.5-mile route of Transmission Line 925 (red line) with approximate distances (meters) of each soil type crossed by the line and the corresponding percentage of the total (NRCS 2025).

Number	Name	Approximate length of transmission line across soil type (meters)	Percentage of total length (rank)
2	Ada cobbly loam, 4 to 15% slopes	720	10.0 (4)
3	Ada cobbly loam, 15 to 30% slopes	90	1.2 (12)
34	Chilcott–Sebree complex, 0 to 2% slopes	270	3.7 (8)
35	Chilcott–Sebree complex, 2 to 4% slopes	2,470	34.2 (1)
63	Gem silty clay loam, 2 to 15% slopes	280	4.0 (7)
64	Gem-Rock outcrop complex, 5 to 40 % slopes	750	10.3 (3)
83	Ladd-Ada complex, 30 to 60% slopes	1,030	14.2 (2)
89	Lankbush–Brent sandy loams, 4 to 12% slopes	200	2.7 (10)
96	Lankbush–Tenmile complex, 4 to 12 % slopes	610	8.4 (5)
98	Lankbush–Tenmile complex, 35 to 65 % slopes	360	5.0 (6)
123	Gravel pits	210	3.0 (9)
175	Tenmile very gravelly loam, 4 to 12% slopes	200	2.7 (10)
1,006	Flofeather sandy loam, 1 to 3% slopes	30	0.4 (13)

Total distance: approximately 7,220 meters (4.5 miles), percentages total 99.6%. Mapped soil types not crossed by the line are not represented in the table.

## 4.2. Water, Fish, and Aquatic Resources (18 CFR §§ 5.6(d)(3)(iii), (iv))

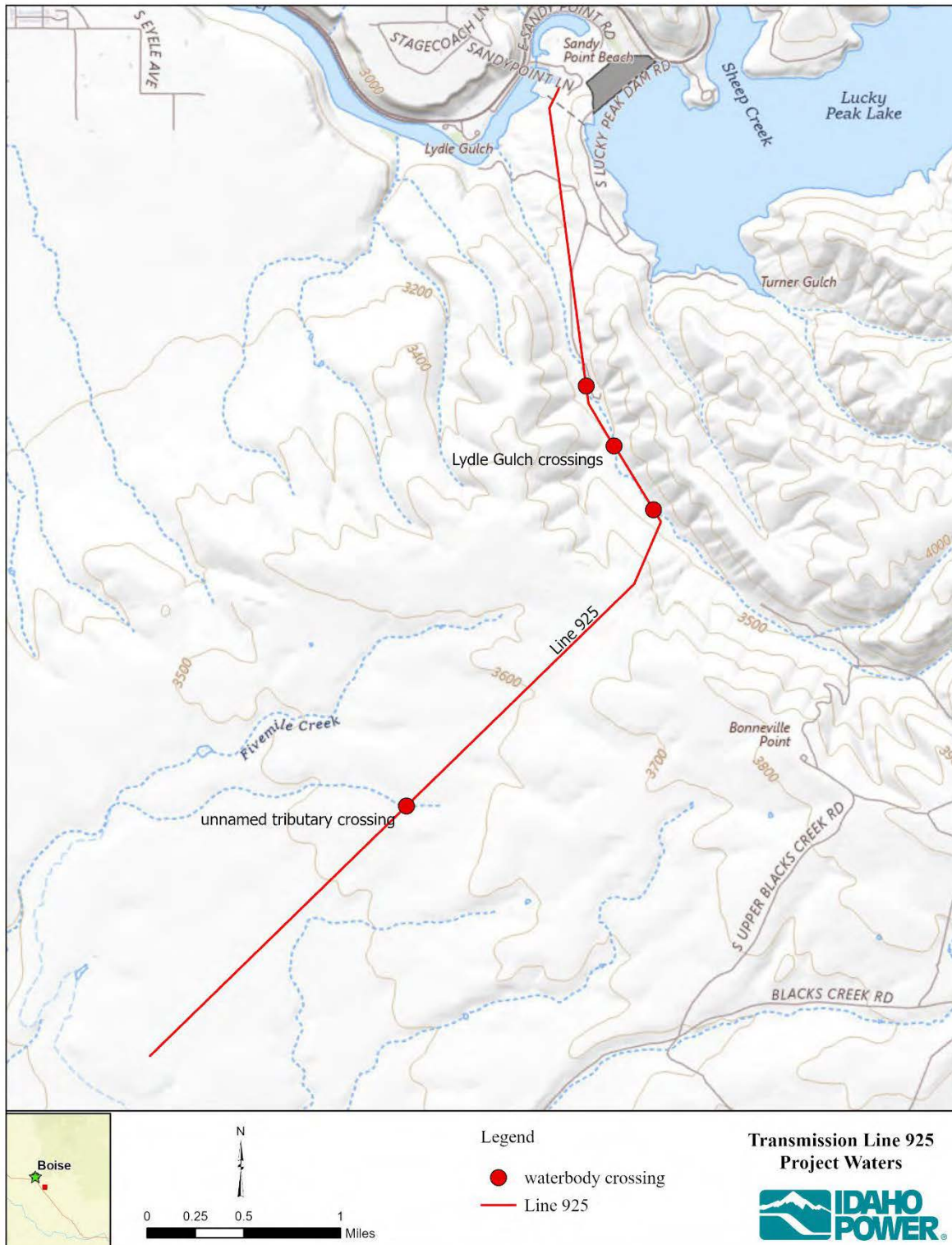
Though the Project is not associated with any river, lake, or reservoir, Line 925 crosses two first-order streams (smallest of the stream hierarchy) (Figure 7). There are no structures within a waterway in the Project, no consultation activities specific to fish or other aquatic species in the existing license, and Idaho Power is unaware of any negative effects on fisheries or other aquatic species from the Project’s historic or proposed continued operation. The Project does not affect or potentially affect any water rights in the Project boundary because Idaho Power does not divert, collect, or use water for the Project.

### 4.2.1. Federally-approved Water Quality Standards Applicable to Waters in the Project Boundary

Lydle Gulch (ID17050114SW011b\_02) is in the Lower Boise hydrologic unit code (HUC) and is designated for cold-water aquatic life (COLD), primary contact recreation (PCR), and domestic

water supply (DWS). It is unassessed for COLD, PCR, and DWS and is in Category 3 of Idaho's 2022 Integrated Report (DEQ 2022).

An unnamed intermittent stream (ID17050114SW010\_02) is a first-order tributary of Fivemile Creek and is in the Lower Boise HUC. It is designated for COLD and secondary contact recreation (SCR). Additionally, it is in Category 4c of Idaho's 2022 Integrated Report for flow modification and is in Category 4a with an approved total maximum daily load (TMDL) for *Escherichia coli* (*E. coli*) (DEQ 2022).

**Figure 7**

Approximate locations where Line 925 traverses the two small streams in the Project boundary



Lydle Gulch and the unnamed tributary are subject to the following general surface water criteria<sup>2</sup>:

- Surface waters of the state shall be free from hazardous materials in concentrations found to be of public health significance or to impair designated beneficial uses.
- Surface waters of the state shall be free from toxic substances in concentrations that impair designated beneficial uses.
- Surface waters of the state shall be free from deleterious materials in concentrations that impair designated beneficial uses.
- Radioactive materials or radioactivity shall not exceed the values listed in the CFR, Title 10, Chapter 1, Part 20, Appendix B, Table 2, Effluent Concentrations, Column 2. Additionally, radioactive materials or radioactivity shall not exceed concentrations required to meet the standards set forth in Title 10, Chapter 1, Part 20, of the CFR for maximum exposure of critical human organs in the case of foodstuffs harvested from these waters for human consumption.
- Surface waters of the state shall be free from floating, suspended, or submerged matter of any kind in concentrations causing nuisance or objectionable conditions or that may impair designated beneficial uses.
- Surface waters of the state shall be free from excess nutrients that can cause visible slime growths or other nuisance aquatic growths impairing designated beneficial uses.
- Surface waters of the state shall be free from oxygen-demanding materials in concentrations that would result in an anaerobic water condition.
- Sediment shall not exceed quantities specified in Sections 250 and 252 of Idaho Water Quality Standards, or, in the absence of specific sediment criteria, quantities which impair designated beneficial uses.

Both pH and total dissolved gas (TDG) criteria apply to all aquatic life designations.

Both water bodies are protected under general water quality criteria for the following:

- pH 6.0 – 9.5 and
- TDG – Not to exceed 110% of saturation at atmospheric pressure.

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<sup>2</sup> Idaho Administrative Procedure Act (IDAPA) 58.01.02.200.

Both water bodies are designated COLD. Waters designated for COLD are not to vary from the following characteristics due to human activities, unless separate site-specific criteria are developed:

- Dissolved oxygen concentrations exceeding 6 milligrams per liter (mg/l) at all times.
- Water temperatures of 22 degrees Celsius ( $^{\circ}\text{C}$ ) or less with a maximum daily average of no greater than  $19^{\circ}\text{C}$ .
- Ammonia criteria are dependent on temperature and pH. The acute criterion (criterion maximum concentration) is the 1-hour average concentration of total ammonia nitrogen, which is not to exceed more than once every 3 years. The chronic criterion (criterion continuous concentration) is the 30-day average concentration of total ammonia nitrogen, which is not to exceed more than once every 3 years.
- Turbidity, below any applicable mixing zone set by the Idaho Department of Environmental Quality (DEQ), shall not exceed background turbidity by more than 50 Nephelometric Turbidity Units (NTU) instantaneously or more than 25 NTU for more than 10 consecutive days.

Lydle Gulch is designated PCR, and the unnamed tributary is designated for SCR.

Waters designated for contact recreation are not to contain E. coli bacteria in concentrations exceeding a geometric mean of 126 E. coli organisms per 100 milliliters (mL) based on a minimum of 5 samples taken every 3 to 11 days over a 45-day period.

The following DWS standards apply, and waters designated DWS are to exhibit the following characteristics:

- Must meet general water quality criteria set forth in Section 200 and the Water & Fish criteria set forth in Subsection 210.01.b of Idaho Water Quality Standards
- Turbidity may not be increased by:
  - more than 5 NTU above background when background turbidity is 50 NTU or less.
  - more than 10% above background when background turbidity is greater than 50 NTU and less than 250 NTU.
  - more than 25 NTU above background when background turbidity is 250 NTU or greater.

#### ***4.2.2. Existing Water Quality Data***

Idaho Power does not have any existing water quality data for either Lydle Gulch or the unnamed tributary. Lydle Gulch is unassessed for COLD, PCR, and DWS by DEQ and has no

associated water quality data. The unnamed tributary has no direct water quality data associated with it. Idaho Power does not have any other data for other physical or chemical parameters.

### 4.3. Botanical Resources Including Rare, Threatened, and Endangered Species (18 CFR §§ 5.6(d)(3)(v), (vii))

This section describes the vegetation communities and special-status plants<sup>3</sup> within the FERC Project boundary. Botanical resources were determined by a desktop analysis of appropriate spatial databases and supplemented with results from a pedestrian special-status species survey that took place within the Project boundary in summer 2023 (McConnell 2024).

#### 4.3.1. Vegetation Communities

The Project is at the intersection of the Idaho Batholith and Snake River Plain Level III ecoregions<sup>4</sup> (EPA 2025). Power line structures 1 through 22 are within the Idaho Batholith ecoregion and structures 23 through 79 occur in the Snake River Plain ecoregion. The Idaho Batholith is a forested system dominated by fir, pine, and spruce trees, while the Snake River Plain ecoregion is a xeric intermontane, sagebrush-grassland vegetation system (EPA 2013). The Project boundary is within a more xeric area and is better defined by the Snake River Plain ecoregion description than the Idaho Batholith. There are three vegetation communities within the Project boundary: shrub/scrub, grassland/herbaceous, and developed lands (NLCD 2021). Vegetation communities are described below.

#### 4.3.2. Shrub/Scrub

The largest vegetation community within the Project boundary, approximately 17.0 acres, is composed of the shrub/scrub community type. Shrub/scrub areas are dominated by shrubs less than 16-feet (5 m) tall with shrub canopy typically greater than 20% of the total vegetation. This class includes true shrubs, young trees in an early successional stage, or trees stunted from environmental conditions (NLCD 2021). Dominant shrubs within the shrub/scrub community in the Project boundary include big sagebrush (*Artemisia tridentata*), antelope bitterbrush (*Purshia tridentata*) and rubber and green rabbitbrushes (*Ericameria nauseosa* and *Chrysothamnus viscidiflorus*, respectively). Throughout the Project boundary, cheatgrass (*Bromus tectorum*) and medusahead (*Taeniatherum caput-medusae*), both invasive annual grasses, dominate the understory of the shrub/scrub vegetation community. In areas with fewer invasive annual grasses, a mix of herbaceous native plants occur including bluebunch

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<sup>3</sup> A special-status plant includes ESA-listed plants within or near the project boundary (IpAC 2025), plants listed in IDFG's Idaho Fish and Wildlife Information System (IDFG 2025), and BLM-listed special-status plants (BLM 2022).

<sup>4</sup> Ecoregions (areas where ecosystems are similar) are used to group type, quality, and quantity of environmental resources. Level III ecoregions describe small ecological areas (EPA 2025).



wheatgrass (*Pseudoroegneria spicata*), basin wildrye (*Elymus cinereus*), arrowleaf balsamroot (*Balsamorhiza sagittata*), and western yarrow (*Achillea millefolium*) (McConnell 2024).

#### 4.3.3. Grassland/Herbaceous

The second largest land cover type within the Project boundary is approximately 15.5 acres of grassland/herbaceous land cover. Grassland/herbaceous areas are dominated by graminoid or herbaceous vegetation, generally consisting of greater than 80% of the total vegetation. These areas are not subject to intensive management such as tilling but can be grazed (NLCD 2021). Grassland habitats within the Project area are generally dominated by cheatgrass or medusahead (invasive annual grasses). Small, relatively undisturbed native grassland/herbaceous areas occur within the Project boundary. Examples of native plants found in these areas include bluebunch wheatgrass, Idaho fescue (*Festuca idahoensis*), western wheatgrass (*Pascopyrum smithii*), lupine (*Lupinus spp.*), hawksbeard (*Crepis spp.*), and desert globe mallow (*Sphaeralcea spp.*) (McConnell 2024).

#### 4.3.4. Developed Lands

There are approximately 0.25 acres of developed lands, classified as medium intensity. Developed, medium intensity lands include areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 50 to 79% of the total cover (NLCD 2021). Developed, medium intensity lands in the Project boundary are associated with the Lucky Peak Substation at Lucky Peak Dam.

#### 4.3.5. Special-Status Plants

The USFWS Information for Planning and Consultation (IpAC) database indicates slickspot peppergrass (*Lepidium papilliferum*), an ESA-listed threatened plant, has the potential to occur within the Project area (IpAC 2025). Slickspot peppergrass and its habitat were not observed during the pedestrian special-status species surveys conducted in summer 2023 (McConnell 2024), nor were any other ESA-listed plants. No ESA-listed critical habitat occurs in the Project area (IpAC 2025).

Previously, Wallowa primrose was categorized as a rare plant, leading to the Project's License Article 19 (see Table 2 in Section 3.5). However, it is no longer considered a rare plant.

The IDFG's Idaho Fish and Wildlife Information System (IFWIS) database (IDFG 2025a) indicates no special-status plants are known in the Project boundary, but Boise sand-verbena (*Abronia mellifera* var. *pahoveorum*), an IDFG described special-status plant, is within 0.4 miles (0.6 kilometers [km]) of the project boundary. No special-status plants were observed during the pedestrian survey, including Boise sand-verbena.

#### 4.3.6. Noxious Weeds

Noxious weed<sup>5</sup> surveys were conducted concurrently with special-status species surveys in 2023 (McConnell 2024). Whitetop (*Cardaria draba*) and rush skeletonweed (*Chondrilla juncea*) were observed in the Project boundary. Whitetop was observed between structures 2 and 3, 14 through 16, and 18 through 20 (Figure 8). One observation of rush skeletonweed was recorded between structures 17 and 18 and was described as widespread at that location. Whitetop and rush skeletonweed are categorized on the “containment” section of the Idaho Noxious Weed List, indicating new or expanding populations should be reduced or eliminated; this is the lowest category of concern on the Idaho noxious weed list (ISDA 2025).

### 4.4. Wildlife Resources including Rare, Threatened and Endangered Species (18 CFR §§ 5.6(d)(3)(v), (vii))

#### 4.4.1. Transmission Line Avian Safety

Negative avian interactions with power lines, including electrocutions, collisions, and nesting may be reduced by thoughtful design and best management practices. The 138-kV, double-circuit transmission line (Line 925) satisfies Idaho Power 60-inch (152 centimeter [cm]) Avian-Safe Guidelines which meet or exceed Avian Power Line Interaction Committee (APLIC) guidelines to prevent bird electrocution on powerlines (APLIC 2006).

APLIC has also issued guidance documents to address collision risk associated with transmission lines (APLIC 2012). Bird collisions can be reduced through siting, design, and line marking to increase the visibility of the line. At Lucky Peak Reservoir, the transmission line is located approximately 450 to 600 feet (137–183 meters [m]) from the dam and embankment. The line is located downslope, approximately 120 feet (37 m) lower in elevation than the rim of the dam. Existing pole heights vary from 65 to 70 feet (20–21 m). Birds flying to the reservoir tend to gain elevation prior to the line to fly above the reservoir. Birds flying downstream from the reservoir tend to fly at the height of the reservoir as they approach the line. Idaho Power has no reported instances of avian collisions or electrocutions on Line 925.

#### 4.4.2. Wildlife Resources

A variety of wildlife use the habitat in the Project boundary and vicinity. Wildlife species observed within 1 mile of the Project were determined by a spatial desktop analysis of data from IFWIS (IDFG 2025a), the Xerces Society (Richardson 2023), and iNaturalist (2024) and

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<sup>5</sup> A “Noxious Weed” is defined by the Idaho State Department of Agriculture (ISDA) as any plant having the potential to cause injury to public health, crops, livestock, land, or property, and which is designated as noxious by the director of Department of Agriculture (Idaho Code, Title 22, Chapter 24 – Noxious Weeds).

supplemented with results from a pedestrian special-status species survey that took place within the Project boundary in summer 2023 (McConnell 2024).

Common amphibians recorded in the area include the long-toed salamander (*Ambystoma macrodactylum*) and Pacific chorus frog (*Pseudacris regilla*). Reptiles include western fence lizard (*Sceloporus occidentalis*), North American racer (*Coluber constrictor*), and gophersnake (*Pituophis catenifer*). The most common large mammal is the mule deer (*Odocoileus hemionus*). Other mammals in the area include coyote (*Canis latrans*), pronghorn (*Antilocapra americana*), mountain lion (*Puma concolor*), American mink (*Neovison vison*), black-tailed jackrabbit (*Lepus californicus*), yellow-bellied marmot (*Marmota flaviventris*), mountain cottontail (*Sylvilagus nuttallii*), American Badger (*Taxidea taxus*), and Piute ground squirrel (*Urocitellus mollis*). Within the Project boundary, there are approximately 32.74 acres of elk (*Cervus elaphus*) and mule deer winter range.

A diverse avian population exists in the Project vicinity. IFWIS data, which includes relevant eBird checklists in the vicinity of the Project, includes over 200 bird species within 1 mile of the project (IDFG 2025a). The diverse habitats present in the vicinity, including the reservoir, river, cliffs, and upland habitats, support a wide range of bird species. Common species include red-tailed hawk (*Buteo jamaicensis*), American robin (*Turdus migratorius*), California quail (*Callipepla californica*), western kingbird (*Tyrannus verticalis*), mourning dove (*Zenaida macroura*), lazuli bunting (*Passerina amoena*), Bullock's oriole (*Icterus bullockii*), American kestrel (*Falco sparverius*), Brewer's blackbird (*Euphagus cyanocephalus*), canyon wren (*Catherpes mexicanus*), barn swallow (*Hirundo rustica*), bald eagle (*Haliaeetus leucocephalus*), osprey (*Pandion haliaetus*), ring-billed gull (*Larus delawarensis*) and many other species (McConnell 2024, IDFG 2025a).

#### 4.4.3. Special-Status Wildlife Species

Idaho Power used IPaC to identify special-status wildlife species in the Project area (IPaC 2025). The IPaC database indicates that 28 bird species of conservation concern (BCC) may potentially occur in the Project vicinity (Table 4). A portion of Line 925 (i.e., structures 24 through 38) crosses BLM land of the Boise District, Four Rivers Field Office. Two amphibian, 21 bird, 1 insect, 19 mammal, and 3 reptile species are identified as sensitive by the Four Rivers BLM Field Office (Table 4). No special-status species were observed during surveys conducted in summer 2023 along Line 925 (McConnell 2024). For each of the special-status species, Table 4 provides the listing status, habitat requirements, potential to occur in the Project vicinity, and rationale for why the species does or does not have the potential to occur. The IFWIS database (IDFG 2025a) and Xerces database (Richardson 2023) were also queried and identified 1 amphibian, 33 bird, 1

insect, and 1 mammal special-status wildlife species<sup>6</sup> occurrences within 1 mile of the Project. In addition, both bald and golden eagles were observed within the Project boundary (Table 4).

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<sup>6</sup> Special-status wildlife includes ESA-listed animals within or near the Project boundary (IpAC 2025), animals listed in IFWIS (IDFG 2025c), BLM-listed special-status animals (BLM 2023), and species protected under the *Bald and Golden Eagle Protection Act* (16 USC §§ 668-668d).

**Table 4**

Special-status wildlife species with the potential to occur within the Project area as identified by the USFWS' IPaC database and the BLM (Four Rivers Field Office).

Common Name (Scientific Name)	Status <sup>1</sup>	Habitat Requirements	Occurrence <sup>2</sup>	Rationale
<b>Amphibians</b>				
Northern Leopard Frog ( <i>Lithobates pipiens</i> )	BLM Sensitive	Occurs in and around wet meadows, potholes, and riparian areas with abundant vegetative cover. Disperses to moist uplands or permanent water during dry-up in summer.	Observed	Observed within 1 mile of the Project in 1971.
Western Toad ( <i>Anaxyrus boreas</i> )	BLM Sensitive	The metamorphosed toads are largely terrestrial and though they are most commonly found near marshes and small lakes, they can also be found in dry forest and shrubby thickets.	Potential	May be present near intermittent, riverine wetlands near the Project boundary at Lydle Gulch.
<b>Birds</b>				
American Avocet ( <i>Recurvirostra americana</i> )	BCC	Breeds in freshwater to hypersaline wetlands including marshes and shallow lakes.	Observed	Present on Lucky Peak Reservoir.
American Goshawk ( <i>Astur atricapillus</i> )	BLM Sensitive	Breeds in coniferous and mixed forests and wooded foothills of mountainous regions.	Observed	Observed rarely in winter in the vicinity of the Project.
American White Pelican ( <i>Pelecanus erythrorhynchos</i> )	BCC	In Idaho, breeding colonies occur at Blackfoot Reservoir, Minidoka National Wildlife Refuge, and Island Park Reservoir. Nest at freshwater lakes with isolated islands with shallow wetlands.	Observed	May be present at Lucky Peak Reservoir seasonally.
Bald Eagle ( <i>Haliaeetus leucocephalus</i> )	BCC, BLM Sensitive	The bald eagle breeds from Alaska and Canada south to California and Florida. Bald eagles are found along coasts, rivers, lakes, and marshes with nearby tall trees or cliffs for nesting.	Observed-Project boundary (PB)	Frequently observed within 1 mile of the Project.
Black Rosy-finch ( <i>Leucosticte atrata</i> )	BCC	Breeds in alpine habitat.	Observed	Occur in winter as transients.
Black Swift ( <i>Cypseloides niger</i> )	BCC	Nests on cliff ledges, often behind waterfalls near moist forests.	Unlikely	Required habitat not available in the vicinity of the Project.

Common Name (Scientific Name)	Status <sup>1</sup>	Habitat Requirements	Occurrence <sup>2</sup>	Rationale
Black Tern ( <i>Chlidonias niger</i> )	BCC	Found near water, including freshwater marshes.	Observed	One observation in the vicinity of the Project.
Black-throated Sparrow ( <i>Amphispiza bilineata</i> )	BLM Sensitive	Found in dry, desert habitat.	Observed	One observation. At the edge of range, rare in area.
Bobolink ( <i>Dolichonyx oryzivorus</i> )	BCC	Breeds in open, grassy fields across North America.	Observed	At the edge of range, rare in area.
Broad-tailed Hummingbird ( <i>Selasphorus platycercus</i> )	BCC	Occurs in understory or tree canopies of pine and oak woodland. Breeding habitat is subalpine meadows, foothills, and montane valleys.	Observed	At the edge of range, rare in area.
Burrowing Owl ( <i>Athene cunicularia</i> )	BLM Sensitive	Typically found in grasslands, rangelands, agricultural areas, and deserts with open, low vegetation. Typically nest and roost in burrows excavated by other species.	Observed	Observed at the southern end of Project.
California Gull ( <i>Larus californicus</i> )	BCC	Breeds at lakes and marshes in interior western North America.	Observed	Commonly observed in the vicinity of the Project.
Calliope Hummingbird ( <i>Selasphorus calliope</i> )	BCC	Breeds in open montane forest, mountain meadows, and willow and alder thickets. During migration, it may be found in lowland brushy areas and semi-desert regions.	Observed	Observed during migration in the vicinity of the Project.
Cassin's Finch ( <i>Haemorhous cassinii</i> )	BCC	Breeds in coniferous forest in mountains of western North America.	Observed	Observed during migration in the vicinity of the Project.
Clark's Grebe ( <i>Aechmophorus clarkii</i> )	BCC	Nests on large inland lakes with suitable tree cover that can be used for nesting.	Observed	Occasionally observed during the breeding season.
Columbian Sharp-tailed Grouse ( <i>Tympanuchus phasianellus columbianus</i> )	BLM Sensitive	Breeds in sagebrush-bunchgrass prairies, mountain shrub, and riparian zones.	Unlikely	No current occupied range in the vicinity of the Project.
Evening Grosbeak ( <i>Coccothraustes vespertinus</i> )	BCC	Breeds in coniferous and mixed forests across mountainous areas of western North America.	Observed	Observed during migration in the vicinity of the Project.
Ferruginous Hawk ( <i>Buteo regalis</i> )	BLM Sensitive	The ferruginous hawk breeds in arid, semi-arid, and grassland regions of western North America.	Observed	Observed in the vicinity of the Project.

Common Name (Scientific Name)	Status <sup>1</sup>	Habitat Requirements	Occurrence <sup>2</sup>	Rationale
Flammulated Owl ( <i>Psiloscops flammeolus</i> )	BCC, BLM Sensitive	Migratory species. Breeds in tree cavities in mature, open ponderosa pine and Douglas fir forests in western North America.	Unlikely	No breeding habitat in the area.
Golden Eagle ( <i>Aquila chrysaetos</i> )	BCC, BLM Sensitive	Golden eagles are a common breeding bird in the western U.S. In Idaho, eagles build stick nests on cliffs or a tree. Golden eagles mainly feed on small mammals, including jackrabbits, cottontails, and ground squirrels but may also eat snakes, birds, ungulates, and carrion.	Observed-PB	Observed in the vicinity of the Project.
Grasshopper Sparrow ( <i>Ammodramus savannarum</i> )	BLM Sensitive	Breeds in grasslands and prairies avoiding trees and shrubs.	Observed	Rarely observed in the vicinity of the Project.
Greater Sage-Grouse ( <i>Centrocercus urophasianus</i> )	BLM Sensitive	Sagebrush obligate species inhabiting sagebrush-grassland communities.	Observed	Two observations in winter in the vicinity of the Project.
Green-tailed Towhee ( <i>Pipilo chlorurus</i> )	BLM Sensitive	Breeds in dense, shrubby habitat including pinyon-juniper forest, at high elevations amid scattered small conifers, and in sagebrush steppe in areas intermixed with shrubs and small trees.	Observed	Observed in May during migration.
Lewis's Woodpecker ( <i>Melanerpes lewis</i> )	BCC, BLM Sensitive	Nests in open ponderosa pine forests with a high density of snags. Also breeds in woodlands near streams.	Observed	Observed in riparian habitat along Lydle Gulch outside the Project boundary.
Loggerhead Shrike ( <i>Lanius ludovicianus</i> )	BLM Sensitive	Inhabits open country with short vegetation and well-spaced shrubs or trees, including desert scrubland, riparian areas, prairies, pastures, and old orchards.	Observed	Observed infrequently in the vicinity of the Project.
Long-billed Curlew ( <i>Numenius americanus</i> )	BLM Sensitive	Nests in shortgrass prairies in a shallow scrape in the ground.	Observed	Observed at the southern end of the Project.
Long-eared Owl ( <i>Asio otus</i> )	BCC	In Idaho, nests in willows, cottonwoods, and junipers adjacent to shrub steppe.	Observed	Observed in the vicinity of the Project.
Mountain Quail ( <i>Oreortyx pictus</i> )	BLM Sensitive	Inhabits mountainous terrain with dense shrubs, including riparian corridors along waterway.	Potential	Typically observed at higher elevations. May be transient in the vicinity of the Project.

Common Name (Scientific Name)	Status <sup>1</sup>	Habitat Requirements	Occurrence <sup>2</sup>	Rationale
Northern Harrier ( <i>Circus hudsonius</i> )	BCC	Found in large undisturbed tracts of wetlands and grasslands with low, thick vegetation.	Observed	Observed frequently in the vicinity of the Project.
Olive-sided Flycatcher ( <i>Contopus cooperi</i> )	BCC, BLM Sensitive	Breeds in open areas of coniferous western forests up to 10,000 feet in elevation near water.	Observed	Observed in the riparian habitat of Lydle Gulch outside of the Project boundary.
Pectoral Sandpiper ( <i>Calidris melanotos</i> )	BCC	Breeds in wet coastal tundra dominated by grasses and sedges.	Potential	May migrate through the area and use the shoreline of Lucky Peak Reservoir.
Pinyon Jay ( <i>Gymnorhinus cyanocephalus</i> )	BCC	Breeds in pinyon-juniper woodlands, sagebrush, and ponderosa pine forests.	Unlikely	Range does not include this area of Idaho.
Rufous Hummingbird ( <i>Selasphorus rufus</i> )	BCC	Typically breed in open or shrubby areas, forest openings, parks, and forests from sea level to 6,000 ft.	Observed	Occasionally observed in the vicinity of the Project, primarily during migration.
Sage Thrasher ( <i>Oreoscoptes montanus</i> )	BCC, BLM Sensitive	Breeds in shrub steppe habitats through the interior west.	Observed	Observed occasionally in the vicinity of the Project.
Sagebrush Sparrow ( <i>Artemisiospiza nevadensis</i> )	BLM Sensitive	Sagebrush obligate, generally dependent on large patches and expanses of sagebrush-steppe for successful breeding.	Observed	Rare in the vicinity of the Project.
Short-eared Owl ( <i>Asio flammeus</i> )	BLM Sensitive	Found in open habitats, such as grassland and marshes.	Potential	Observed within 2 miles of the project.
Virginia's Warbler ( <i>Leiothlypis virginiae</i> )	BCC	Breeds in open pinyon-juniper woodlands, often on steep slopes.	Observed	Observed rarely in the vicinity of the Project during migration.
Western Grebe ( <i>Aechmophorus occidentalis</i> )	BCC	Breeds on large, freshwater lakes and marshes.	Observed	Observed somewhat frequently in the vicinity of the Project at Lucky Peak Reservoir.
White-headed Woodpecker ( <i>Dryobates albolarvatus</i> )	BLM Sensitive	Nests in pine forests in mountains of western North America.	Observed	Observed once in fall.
Willet ( <i>Tringa semipalmata</i> )	BCC	Nests in marshes, along pond edges, and other wetlands. Winters along both seacoasts.	Potential	May migrate through the area and use the shoreline of Lucky Peak Reservoir.



Common Name (Scientific Name)	Status <sup>1</sup>	Habitat Requirements	Occurrence <sup>2</sup>	Rationale
Willow Flycatcher ( <i>Empidonax trailii</i> )	BLM Sensitive	Willow flycatchers breed in a variety of habitats ranging from brushy fields to willow thickets along streams, as well as the edges of gallery forests along rivers or streams.	Observed	Observed somewhat frequently in the vicinity of the Project.
<b>Invertebrates</b>				
Western Bumble Bee ( <i>Bombus occidentalis</i> )	BLM Sensitive	Found in open grassy areas, sagebrush steppe, and mountain meadows.	Potential	One western bumble bee occurrence record observed prior to 2003 overlaps the 1-mile buffer.
<b>Mammals</b>				
Big Brown Bat ( <i>Eptesicus fuscus</i> )	BLM Sensitive	Generalist species that can live in urban, suburban, and rural environments	Potential	Within modeled range (IDFG 2025b).
Bighorn Sheep ( <i>Ovis canadensis</i> )	BLM Sensitive	Found in a variety of habitats from desert grasslands to alpine meadows.	Unlikely	Project is outside modeled range (IDFG 2025b).
Canyon Bat ( <i>Parastrellus hesperus</i> )	BLM Sensitive	Found in deserts and lowlands, desert scrub flats, and rocky canyons of western U.S. below 5,000 feet elevation.	Potential	Within modeled range (IDFG 2025b).
Fisher ( <i>Pekania pennanti</i> )	BLM Sensitive	Found in upland and lowland mixed, deciduous or coniferous forests. In Idaho, prefer mature forests with dense canopy.	Unlikely	Project is outside modeled range (IDFG 2025b).
Fringed Myotis ( <i>Myotis thysanodes</i> )	BLM Sensitive	Found in desert shrublands, sagebrush-grassland and wooded habitats from 3,600 to 6,300 feet.	Unlikely	Within modeled range (IDFG 2025b).
Gray Wolf ( <i>Canis lupus</i> )	BLM Sensitive	Generally found in forested and mountainous country in central Idaho.	Potential	Observed within 2 miles, likely transient between suitable habitats.
Hoary Bat ( <i>Lasiurus cinereus</i> )	BLM Sensitive	Roost in trees at the edge of clearing in both coniferous and deciduous trees.	Potential	Within modeled range (IDFG 2025b).
Little Brown Myotis ( <i>Myotis lucifugus</i> )	BLM Sensitive	Found in a wide range of elevations often associated with forests containing snags, old buildings, and slack water areas.	Potential	Within modeled range (IDFG 2025b).

Common Name (Scientific Name)	Status <sup>1</sup>	Habitat Requirements	Occurrence <sup>2</sup>	Rationale
Long-eared Myotis ( <i>Myotis evotis</i> )	BLM Sensitive	Found in forest habitat under exfoliating bark, in cavities in trees, and in stumps from logging as well as in crevices in cliffs.	Unlikely	Project is outside modeled range (IDFG 2025b).
Long-legged Myotis ( <i>Myotis volans</i> )	BLM Sensitive	Occurs in a variety of habitats from desert to mountainous coniferous forest, where it is most common near open water.	Unlikely	Project is outside modeled range (IDFG 2025b).
Pallid Bat ( <i>Antrozous pallidus</i> )	BLM Sensitive	Found in arid or semi-arid shrub steppe, grasslands, and higher elevation coniferous forests. Roosts in rock crevices, mines, hollow cavities in trees, and buildings.	Potential	Within modeled range (IDFG 2025b).
Piute Ground Squirrel ( <i>Urocitellus mollis</i> )	BLM Sensitive	Found in shrub steppe habitat in areas with well-drained soils.	Observed	Within modeled range (IDFG 2025b).
Pygmy Rabbit ( <i>Brachylagus idahoensis</i> )	BLM Sensitive	Found in areas with deep soils and tall, dense sagebrush.	Potential	Project is at the edge of the modeled range (IDFG 2025b).
Silver-haired Bat ( <i>Lasionycteris noctivagans</i> )	BLM Sensitive	Found in a wide range of elevations in trees containing cavities or exfoliating bark.	Potential	Within modeled range (IDFG 2025b).
Southern Idaho Ground Squirrel ( <i>Urocitellus endemicus</i> )	BLM Sensitive	Found in sagebrush steppe habitat in a restricted area of Gem, Payette, and Washington counties in Idaho.	Unlikely	Outside known breeding range (IDFG 2025b).
Spotted Bat ( <i>Euderma maculatum</i> )	BLM Sensitive	Found in various habitats from desert to montane coniferous forests up to 7,500 feet in elevation.	Potential	Observed within 2 miles of the Project.
Townsend's Big-eared Bat ( <i>Corynorhinus townsendii</i> )	BLM Sensitive	Found in a variety of habitats from desert shrub to deciduous and coniferous forests at a wide range of elevations. May use mines and old buildings as roosts.	Potential	Project in the vicinity of modeled range (IDFG 2025b).
Western Small-footed Myotis ( <i>Myotis ciliolabrum</i> )	BLM Sensitive	Found in arid habitats associated with cliffs and talus slopes.	Potential	Within modeled range (IDFG 2025b).
Yuma Myotis ( <i>Myotis yumanensis</i> )	BLM Sensitive	Found in a variety of western lowland habitat in areas of abundant water.	Potential	Within modeled range (IDFG 2025b).

Common Name (Scientific Name)	Status <sup>1</sup>	Habitat Requirements	Occurrence <sup>2</sup>	Rationale
<b>Reptiles</b>				
Great Basin Collared Lizard ( <i>Crotaphytus bicinctores</i> )	BLM Sensitive	Found in southeastern Oregon, from southwestern Idaho through western Nevada, in western and southern Utah, and from extreme northwestern Arizona to southeastern California and Baja California. Associated with arid habitats with rocks and boulders.	Unlikely	Project is outside modeled range (IDFG 2025b).
Long-nosed Snake ( <i>Rhinocheilus lecontei</i> )	BLM Sensitive	Found in desert lowland areas that have sandy or loose soil and numerous burrows. In Idaho, long-nosed snakes can be found in the southwestern desert regions of the state.	Potential	Project is within modeled range (IDFG 2025b).
Western Groundsnake ( <i>Sonora semiannulata</i> )	BLM Sensitive	Found in arid habitats usually having loose or sandy soil, ranging from rocky areas (talus slopes, canyon rims and outcroppings) to low desert shrub areas.	Potential	Project is within modeled range (IDFG 2025b).

<sup>1</sup> BCC—Birds of Conservation Concern (IPaC 2025), Sensitive -BLM (Four Rivers Field Office)

<sup>2</sup> IFWIS (IDFG 2025a)—Observed—PB: Species observed within the project boundary; Observed: Species observed within 1 mile of the Project; Potential: Habitat is available within 1 mile of the Project that may be suitable for the species; Unlikely: Habitat is not available in the vicinity of the Project or the Project is outside of the species' known range.

#### **4.4.4. Federal Endangered Species Act Listed and Proposed or Candidate Wildlife Species**

Idaho Power used the IPaC system to identify any species listed as threatened or endangered or proposed for listing under the ESA and critical habitat for any listed species that may exist in the Project vicinity (IPaC 2025). The wolverine (*Gulo gulo*), yellow-billed cuckoo (*Coccyzus americanus*), monarch butterfly (*Danaus plexippus*), and Suckley's cuckoo bumble bee (*Bombus suckleyi*) could potentially occur in the Project vicinity (Table 5). No critical habitat occurs within the Project boundary or within the vicinity of the Project.

For each of the listed species, Table 5 provides the listing status, habitat requirements, potential to occur in the Project vicinity, and rationale for why the species does or does not have the potential to occur. Listed species observed within 1 mile of the project were determined by a spatial desktop analysis of data from IFWIS (IDFG 2025a), the Xerces Society (Richardson 2023), Western Milkweed Mapper (WMMOD 2018), and iNaturalist (2024), and supplemented with results from a pedestrian special-status species survey that took place within the Project boundary in summer 2023 (McConnell 2024) and a site visit on March 18, 2025.

##### **4.4.4.1. Life Histories of ESA-Listed and Candidate or Proposed Species**

###### **4.4.4.1.1. Monarch Butterfly**

The monarch butterfly was designated as a proposed threatened species, with a corresponding Section 4(d) rule under ESA on December 12, 2024 (89 Federal Register (FR) 100662).

Monarch butterflies rely on milkweed (*Asclepias* spp.) plants as larval habitat and as an adult nectar source. Eggs are laid on milkweed plants, and larvae (caterpillars) feed on leaves as they develop through five instars, culminating in a green and gold chrysalis (pupa). Adult monarch butterflies emerge from the chrysalis within six to 14 days, with the entire development process taking approximately 4 to 6 weeks, dependent on ambient temperature. Multiple generations of monarch butterflies are produced each spring/summer at breeding locations, where they will live for two to five weeks. Based on lower ambient temperatures, monarch butterflies will begin a reproductive diapause in preparation for migration and overwintering. Individuals will live for six to nine months and travel hundreds to thousands of miles during the fall migration and overwintering period. The western monarch found in Idaho primarily migrates to and overwinters in California and Baja Mexico. The western monarch population size has declined steeply over the last 20 to 30 years—only thousands, compared to millions, are being recorded each year at overwintering sites. Overwintering western monarch counts peaked at 9,119 in 2024, the second lowest count recorded (Xerces Society 2025).

The Western Milkweed Mapper, which compiles monarch and milkweed data, currently has one monarch record (Adult) and one milkweed (*Asclepias speciosa*) record within 1 mile of the

Project boundary. A site visit was conducted on March 18, 2025, and no milkweed was observed within the Project boundary. Therefore, monarchs may forage within the Project boundary but would not be breeding.

#### **4.4.4.1.2. Suckley's Cuckoo Bumble Bee**

On December 17, 2024, the USFWS proposed to list the Suckley's cuckoo bumble bee as an endangered species pursuant to the ESA (86 FR 25833). If this rule is finalized, it would add this species to the List of Endangered and Threatened Wildlife. Due to the lack of data, proposed critical habitat has not been designated for this species.

Suckley's cuckoo bumble bee has a broad historical distribution across North America, and it has been found in various habitat types including prairies, grasslands, meadows, urban and agricultural areas, and woodlands from 2 to 3,200 m (6 to 10,500 feet) in elevation (Williams et al. 2014; Martin et al. 2023). Cuckoo bumble bees are generally observed in low abundance at the margins of a host species' range, and cuckoo bumble bee distributions are less than that of the host species (Antonovics and Edwards 2011).

Suckley's cuckoo bumble bee has not been observed in the United States since 2016, despite widespread historical occurrence records and increased sampling effort for bumble bees through collaborative efforts of the Bumble Bee Atlas. Rangewide declines have occurred and since 2000; the species has only been detected in 9 of the 15 previously occupied ecoregions (USFWS 2024). Since Suckley's cuckoo bumble bees are entirely dependent on host bumble bee colonies, host colony availability is critical for the species' survival and overall viability. Cuckoo bumble bee females emerge from hibernation in the spring and take over the nest of a suitable host colony, where host workers care for their young. Suckley's cuckoo bumble bee is described as a semi-specialist parasite (Lhomme and Hines 2019) and is confirmed to usurp nests of western bumble bees and Nevada bumble bees (*B. nevadensis*), with other potential hosts in subgenus *Bombus* throughout the extent of its range, including yellow-banded bumble bee (*B. terricola*), red-belted bumble bee (*B. rufocinctus*), yellow bumble bee (*B. fervidus*), and white-shouldered bumble bee (*B. appositus*) (Hobbs 1968; Williams et al. 2014). Bumble bees typically nest in underground cavities, such as old rodent burrows or nests, cavities in wood, dry grass, or leaf litter.

Cuckoo bumble bees have higher extinction vulnerability than host species because they are entirely dependent on host colonies for reproduction (Suhonen et al. 2015). The presence of parasitic bees depends on the presence of their hosts; any stressor effects on the host will be reflected in the status of the parasite (Sheffield et al. 2013). Because cuckoo bumble bees depend on host species, there is a co-extinction risk for host and parasite species (Suhonen et al. 2015). Thus, signs that host species are declining are of major concern to the viability of Suckley's cuckoo bumble bee.

The Project area is located within the Western Cordillera ecoregion. The last detection of Suckley's cuckoo bumble bee in this ecoregion was in Canada in 2018 (USFWS 2024). No historic

occurrences of Suckley's cuckoo bumble bee have been recorded in the vicinity of the Project, and the last recorded Suckley's cuckoo bumble bee in Idaho was prior to 2003 (Richardson 2023). Both western bumble bee and Nevada bumble bee, hosts for Suckley's cuckoo bumble bee, have recent occurrence records within 1 mile of the Project boundary. One observation of western bumble bee and 7 observations of Nevada bumble bee have been recorded (IDFG 2025a, Richardson 2023, iNaturalist 2024). Suckley's cuckoo bumble bee has not been identified in Idaho by the Pacific Northwest Bumble Bee Atlas despite widespread surveys from 2018 to 2024 (Bumble Bee Atlas 2024). The nearest historic record was observed in 1972 approximately 36 miles from the Project at approximately 7,400 foot elevation.

Suckley's cuckoo bumble bee populations have declined precipitously, and the species is unlikely to occur in the Project area.

#### **4.4.4.1.3. Yellow-billed Cuckoo**

In 2014, the USFWS determined threatened status under the ESA, as amended, for the western distinct population segment of the yellow-billed cuckoo, a species located in the western portions of the U.S., Canada, and Mexico (79 FR 59991). Critical habitat was designated on April 21, 2021 (86 FR 20798). In total, 298,845 acres (120,938 ha) are now designated as critical habitat in Arizona, California, Colorado, Idaho, New Mexico, Texas, and Utah. Critical habitat in Idaho is in eastern Idaho. No critical habitat is within the Project boundary.

Yellow-billed cuckoos prefer open woodland with clearings and low, dense, scrubby vegetation, often associated with watercourses. In the west, the species prefers desert riparian woodlands comprised of willow, cottonwood (*Populus* spp), alder (*Alnus* spp.), walnut (*Juglans* sp.), box elder (*Acer negundo*), and dense mesquite (*Prosopis* spp.). Nests are most frequently placed in willows, but cottonwoods are used extensively for foraging. Preference is given to patches of riparian habitat greater than 81 ha in size and at least 100 m wide (Hughes 2015). Narrow, linear riparian strips less than 20 m wide are not thought to be used for nesting. However, these areas can provide foraging habitat, and single adults have been observed in small patches during migration or foraging in these patches during the breeding season, in areas with extensive habitat patches in the surrounding landscape (Haltermann et al. 2016).

The decline of the western yellow-billed cuckoo is primarily the result of riparian habitat loss and degradation (79 FR 59991). Habitat of the yellow-billed cuckoo consists of expansive blocks of riparian vegetation containing trees of various ages, including larger, more mature trees used for nesting and foraging. Principal causes of riparian habitat destruction, modification, and degradation in the range of the yellow-billed cuckoo have occurred from alteration of hydrology due to dams, water diversions, management of river flow that differs from natural hydrological patterns, channelization, and levees and other forms of bank stabilization that encroach into the floodplain. These losses are further exacerbated by livestock grazing, pesticide use, and competition from exotic plants, such as tamarisk (*Tamarix* spp.).

The yellow-billed cuckoo was historically considered local and uncommon in Idaho. Recent surveys conducted in Southern Idaho detected yellow-billed cuckoo along the Big Wood River, along the Snake River above American Falls Reservoir, and the South Fork and Henry's Fork of the Snake River in eastern Idaho (Coates et al. 2019). In southwestern Idaho, the yellow-billed cuckoo has been considered a rare, sometimes erratic, visitor and breeder. The nearest designated critical habitat is located approximately 170 miles from the Project. No yellow-billed cuckoos have been observed within 1 mile of the Project, and no riparian habitat is located within the Project boundary. Therefore, the yellow-billed cuckoo is unlikely to occur in the Project area.

#### **4.4.4.1.4. *Wolverine***

On November 30, 2023, the USFWS listed the distinct population segment of the wolverine occurring in the contiguous U.S. as threatened under the ESA (88 FR 83726). Critical habitat for the wolverine has not been designated at this time. Under the interim 4(d) rule, incidental take caused by research activities, lawful trapping of other species, and forest management activities associated with wildfire risk reduction is not prohibited.

The North American wolverine inhabits arctic, boreal, and alpine habitats in Alaska, western Canada, and the western contiguous U.S. (Slough 2007). Within these occupied areas, wolverines are restricted to areas in high mountains, near the treeline, where conditions are cold year-round and snow cover persists well into the month of May. Wolverines do not appear to specialize on specific vegetation or geological habitat aspects but instead select cold areas that receive enough winter precipitation to reliably maintain deep persistent snow late into the warm season (Copeland et al. 2010). Wolverines, while primarily carnivorous scavengers, are opportunistic feeders that consume a variety of foods, depending on availability. They are known for scavenging the carrion of large animals like elk, deer, and moose, but they are also capable of killing small mammals and birds.

The Project area is outside of the modeled range of wolverine. Wolverines are unlikely to occur in the Project area but could occur as transient animals.

**Table 5**

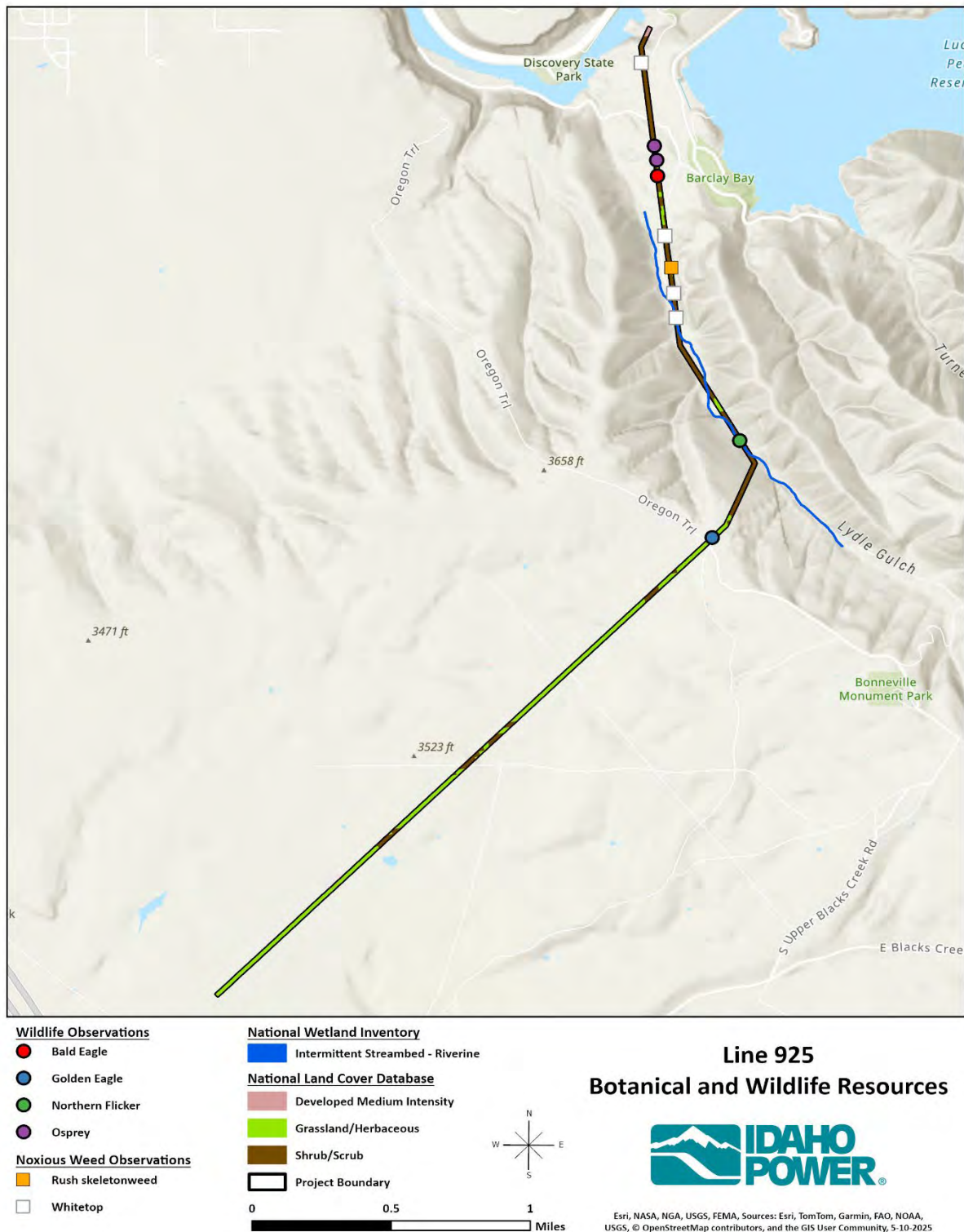
Species listed under the ESA as threatened, endangered, or proposed for listing

Common Name (Scientific Name)	Status	Habitat Requirements	Occurrence <sup>1</sup>	Rationale
<b>Invertebrates</b>				
Suckley's Cuckoo Bumble Bee ( <i>Bombus suckleyi</i> )	ESA—Proposed Endangered	Suckley's cuckoo bumble bee is a semi-specialist parasite and is confirmed to usurp nests of western bumble bees and Nevada bumble bees, with other potential hosts in subgenus <i>Bombus</i> . Bumble bees typically nest in underground cavities such as old rodent burrows or nests, cavities in wood, dry grass, or leaf litter. Cuckoo bumble bees require a variety of native floral resources (pollen and nectar).	Potential	Host species (One Western Bumble Bee and 7 Nevada bumble bee occurrences) occur within 1 mile of the Project.
Monarch butterfly ( <i>Danaus plexippus</i> )	ESA—Proposed Threatened	Monarch butterflies rely on milkweed plants as larval habitat and as an adult nectar source. Eggs are laid on milkweed plants, and larvae (caterpillars) feed on leaves as they develop through five instars, culminating in a green and gold chrysalis (pupa), then emerging as adults 6 to 14 days later. Adults require nectar-rich flowers for feeding. No proposed critical habitat exists within the Project boundary.	Observed	Milkweed plants do not occur within the Project boundary but do occur within the 1-mile buffer. One observation of monarch butterfly has been observed approximately 1,000 ft. from Line 925 (WMMOD 2018).



Common Name (Scientific Name)	Status	Habitat Requirements	Occurrence <sup>1</sup>	Rationale
<b>Birds</b>				
Yellow-billed Cuckoo ( <i>Coccyzus americanus</i> )	ESA—Threatened	Yellow-billed cuckoos in the West prefer desert riparian woodlands comprised of willow, cottonwood, alder, walnut, and box elder. Nests are most frequently placed in willows, but cottonwoods are used extensively for foraging. Preference is given to patches of riparian habitat greater than 81 ha in size and at least 100 m in width (Hughes 2015). Narrow, linear riparian strips less than 20 m wide are not thought to be used for nesting but may provide foraging habitat.	Unlikely	Riparian habitat for breeding unavailable in the Project area.
<b>Mammals</b>				
Wolverine ( <i>Gulo gulo</i> )	ESA—Threatened	The North American wolverine inhabits arctic, boreal, and alpine habitats in Alaska, western Canada, and the western contiguous U.S. Wolverines are restricted to areas in high mountains, near the tree line, where conditions are cold year-round and snow cover persists well into the month of May.	Unlikely	Breeding habitat is not present in the Project area.

<sup>1</sup> Observed—Species observed within 1 mile of the Project (IDFG 2025a), Potential—Habitat is available within 1 mile of the Project that may be suitable for the species, Unlikely—Habitat is not available in the vicinity of the Project or the Project is outside of the species' known range.

**Figure 8**

Certain botanical and wildlife resources within the Line 925 Project boundary

#### **4.5. Wetlands, Riparian, and Littoral Habitats (18 CFR § 5.6(d)(3)(vi))**

Approximately 0.73 acres of intermittent, riverine wetlands occur within the Project boundary (USFWS 2015). This area is within a dry draw called Lydle Gulch. Within the gulch, wet springs can cause short-lived, ephemeral water flows. If water flows in the gulch, it drains into the Boise River from areas of the gulch outside the Project boundary (USACE 2024).

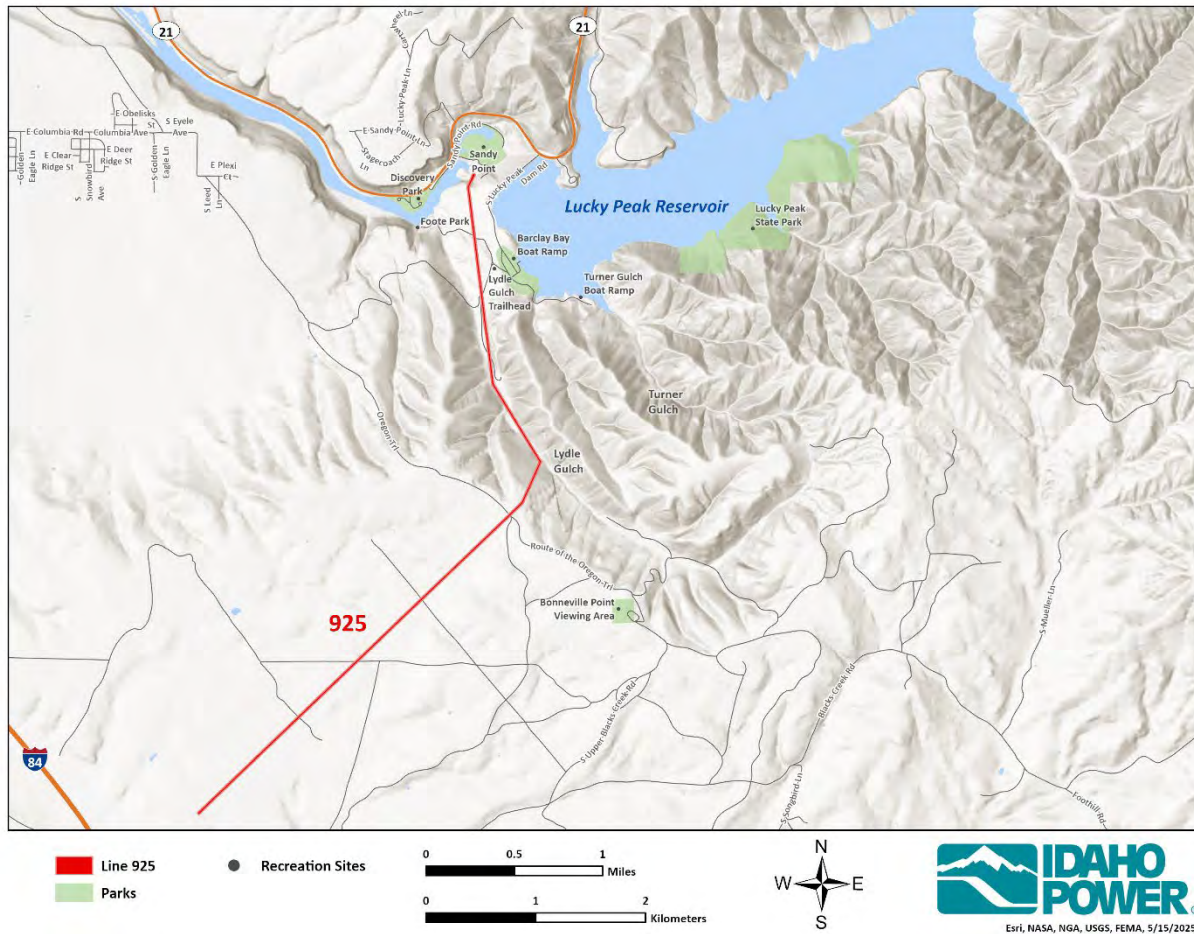
Riverine wetland areas intersecting the Project boundary are at structures 19 through 21 and 25 through 31.

Ephemeral water flows in Lydle Gulch do not support riparian habitat within the Project boundary (McConnell 2024, USACE 2024). There are no littoral habitats within the Project boundary.

#### **4.6. Recreation and Land Use (18 CFR § 5.6(d)(3)(viii))**

##### ***4.6.1. Existing Recreation***

Recreation along Line 925 (Figure 9) is managed by the USACE for the lower 1½ miles of the line and by the BLM for about 0.8 miles, with the rest transecting private land. The 4.5 mile run of Line 925 bisects public access roads, designated trails, disc golf holes (figures 10 and 11), a spur of the Oregon National Historic Trail, and other informal travel routes on BLM land. The first 1.7 miles of the line follows Lydle Gulch and has the greatest concentration of public access and recreation use. Lydle Gulch boasts hiking, biking, and equestrian opportunities. This section runs directly over or adjacent to a designated trail used for non-motorized use as well as for accessing the two-disc golf courses.



**Figure 9**  
Recreation sites along and near the Project





**Figure 10**  
USACE's Lydle Gulch Blue Disc Golf Course

**Figure 11**

USACE's Lydle Gulch Gold Disc Golf Course

A small part (about 260 acres) of the Boise River Wildlife Management Area, managed by the IDFG, is found in T2NR3E sections 14 and 13. Of note, this area is managed for winter big game refuge, therefore public access is often closed to recreational uses in winter months.

In Lydle Gulch, within or directly adjacent to the existing USACE ROW, there are portions of two different 20-hole disc golf courses, non-motorized trails, a vault toilet, and a service road that serves as a portion of the trail and serpentine through part of the first 1.25 miles of Line 925's ROW. This portion has been developed and is managed by the USACE. Some motorized routes cross under points along the Southwestern run of Line 925 on private and BLM land (National Park Service 2025). A portion of the Oregon Trail route bisects Line 925 at about the midway point and is utilized for motorized and non-motorized recreation (BLM 2025).

Under the respective permitting processes with USACE and BLM, Idaho Power and its contractors avoid, protect, mitigate for, or otherwise endeavor to re-establish recreation facilities, if present, that may be affected by transmission line maintenance. Similarly, Idaho Power engages with IDFG and others regarding work procedures that minimize impact to wintering big game.

Outside the Project boundary but in the general Project vicinity, other recreational opportunities are available (Figure 9). The USACE manages Foote Park, affording an interpretive site, picnic space, and restrooms. See Section 4.8 for additional discussion. At Sandy Point, a Lucky Peak state park downstream of Lucky Peak Dam, recreation includes picnicking, swimming, and another disc golf course (USACE 2025b). State parks are managed by the Idaho Department of Parks and Recreation (IDPR). Lucky Peak Reservoir offers a host of options including swimming, fishing, hiking, camping, and boating (USACE 2025a). Those features are managed by the USACE and IDPR. Turner Gulch and Barclay Bay, upstream of the dam on the south side of the Lucky Peak Reservoir, boast boat ramps and picnic areas (USACE 2025b). Barclay Bay also has swimming and a playground area. Both areas are managed by the USACE (USACE 2025b).

#### **4.6.2. Shoreline**

The Project is comprised of a single transmission line with a linear project boundary paralleling the line. The Project does not cross any river, reservoir, or lake, and thus the Project is not associated with any shoreline. Accordingly, Idaho Power does not have a shoreline management plan for this Project.

#### **4.6.3. Land Use**

The Project is not associated with any land under study for inclusion in the National Trails System or designated as or under study for inclusion as a Wilderness Area. The Project is not within or adjacent to a state-protected river segment or area designated as or under study for inclusion in the National Wild and Scenic River system.

Non-recreational lands that lie within the Project boundary consist primarily of private lands. The primary use for these lands is non-irrigated livestock grazing.

#### **4.6.4. Future Recreation Needs**

There are no specific future recreation needs identified in IDPR's current State Comprehensive Outdoor Recreation Plan (SCORP) for the Project boundary. Assessing future Idaho recreation needs/trends in general, the SCORP lists animal-friendly activities (specifically the increased demand for dog parks), expanded bike offerings (e.g., to accommodate e-bikes), spikeball, paddleboarding, and rock climbing (IDPR 2022).

### **4.7. Aesthetic Resources (18 CFR § 5.6(d)(3)(ix))**

Line 925 originates at the Lucky Peak switchyard, immediately adjacent to the power plant at the base of Lucky Peak Dam (Figure 12). Line 925 is visible from the Lucky Peak State Park Sandy Point and Discovery units and from the USACE's Foote Park. Line 925 extends south along Lydle Gulch, where it is paralleled by the Lydle Gulch trail loop for approximately 1.25 miles



(Figure 13). At this point, the Line 925 turns southwest out of Lydle Gulch for approximately 3 miles in the direction of its connection point to Idaho Power's transmission Line 410.



**Figure 12**

Line 925 looking north towards the Lucky Peak switchyard



**Figure 13**

Line 925 looking south along Lydle Gulch before the dog-leg to the right and southwest out of Lydle Gulch

The line location for Line 925 was selected to take advantage of the natural topographic features of Lydle Gulch to conceal it from public view, as much as possible. From the BLM's Bonneville Point viewing area, a very short section of Line 925 is visible from a distance. Further, Line 925 crosses a mix of private lands and is largely not visible from public access points.

The landscape within the viewshed of Line 925 consists of primarily semi-arid sagebrush steppe and shrublands and non-irrigated private lands used for livestock grazing.

#### **4.8. Cultural and Historic Resources (18 CFR § 5.6(d)(3)(x))**

The Project extends approximately 4.5 miles. The federally administered lands within the project boundary (2.1 miles) have been previously surveyed for cultural, archaeological, and historic built resources. Therefore, the Project's archaeological, cultural, and historic built resources located on federal lands are generally well understood, but a comprehensive survey of private lands (2.4 miles) has not been conducted.

A review of internal Idaho Power cultural resources records as well as available cultural records from the Idaho SHPO's Idaho Cultural Resource Information System (ICRIS) was completed in February of 2025. These reviews indicate that between 2013 and 2024, seven archaeological investigations were conducted on BLM and USACE administered lands within a 0.5-mile buffer of the Project boundary's centerline. These investigations include Class I literature reviews, Class II reconnaissance surveys, and Class III intensive pedestrian surveys. No subsurface testing in the Project area has occurred. Pertaining to the lands within the Project boundary, the most thorough Class III survey was completed in 2024 (Woods 2024) and covered 100% of the Project area on federal lands. This survey is the most recent and complete investigation. Concerning lands located at the Lucky Peak Dam and Hydroelectric Facility, surveys were conducted in 2011 and 2013 by the USACE (Hall 2012, Hall 2013). The remaining 2.4 miles of the Project area is located on private land, which has not been surveyed for cultural resources.

Previous surveys on federal lands within 0.5 miles of the Project boundary centerline identified 13 cultural resources including linear sites such as electrical transmission lines (Lines 410, 902, 906, 912, and 210), historic roads (Blacks Creek Road, US Highway 20), an emigrant trail (Oregon Trail/Kelton Road/Goodale's Cutoff), and a canal (Five Mile Creek Drain). The segment of Oregon Trail in the Project area has been determined to be a contributing element to a National Register of Historic Places (NRHP) District as well as an individual linear site. Line 925 is also associated with the Lucky Peak Hydroelectric Facility, as it connects the power generation facility to Idaho Power's Transmission Line 410. The Lucky Peak Dam has been recorded as a cultural resource. One historic aged archaeological site, the Mary Hallock Foote House, is in the general vicinity of the Project. Concerning precontact Native American cultural resources, 2 known archaeological lithic scatters are located in the general area of the Project. No known sites have been identified on non-federal lands.

Of the 13 known cultural resources within 0.5 miles of the Project boundary centerline, 7 have been found eligible for the NRHP, and 6 are ineligible. Within the Project boundary, 7 cultural resources have been documented: 3 have been found eligible, 4 have been found ineligible. Historic properties located within the Project boundary include the Lucky Peak Dam (10AA7633), the Oregon Trail/Kelton Road/ Goodale's Cutoff (10AA955, 10AA121), and a precontact Native American lithic scatter (10AA97). Lucky Peak Dam was completed in 1955 and has been determined eligible under Criterion A for its association with flood control and irrigation in the Boise River Basin, as well as Criterion C for its distinctive engineering qualities. The Oregon Trail is a very well-known and important emigrant trail in America. It has been listed in the NRHP under Criterion A for its significance to the transportation and settlement of the American West. The portion of the Oregon Trail within the Project boundary has been determined to be a Class II type trail "as the trail retains essence of its original character but shows past or present use by motor vehicles, typically as a two-track overlaying the original wagon trail" (Hutchison and Jones 1993). One site associated with precontact Native Americans, 10AA97, has been identified on federal lands within the Project boundary. This site was originally recorded in 1976 and updated in 2012. The site has been recorded as a 4.7-acre surface scatter of tested cobbles, abandoned cores, and lithic debitage of the same material

type (Hall 2012). This site is eligible for the NRHP under Criterion D for its significant data potential concerning precontact Native American lifeways. See Table 6 for site information.

**Table 6**

Cultural and historic resource site information

Site Number	Date/Cultural Affiliation	Site Type/Description	NRHP Eligibility	Comments	Relationship to FERC Project Area
10AA72	Precontact	Lithic Scatter	Eligible		Outside FERC Boundary
10AA96	Historic	Mary Hallock Foote House, foundation, debris	Eligible		Outside FERC Boundary
10AA97	Precontact	Lithic Scatter	Eligible		Inside FERC Boundary
10AA121	Historic	Oregon Trail/Kelton Road/Goodale's Cutoff	Eligible	Linear Site	Inside FERC Boundary
10AA955	Historic	Oregon Trail	Eligible	District	Inside FERC Boundary
10AA6294	Historic	Five Mile Creek Drain	Eligible		Outside FERC Boundary
10AA7633	Historic	Lucky Peak Dam	Eligible		Inside FERC Boundary
10AA7634	Historic	Transmission Line 210	Not Eligible		Outside FERC Boundary
10AA10994	Historic	Transmission Line 912	Not Eligible		Inside FERC Boundary
10AA10995	Historic	Transmission Line 906	Not Eligible		Inside FERC Boundary
10AA10996	Historic	Blacks Creek Road	Not Eligible		Outside FERC Boundary
10CR3071	Historic	State Highway 21	Eligible		Outside FERC Boundary
10EL3096	Historic	Transmission Line 410	Not Eligible		Inside FERC Boundary
10EL3105	Historic	Transmission Line 902	Not Eligible		Inside FERC Boundary

#### 4.9. Tribal Resources (18 CFR § 5.6(d)(3)(xii))

The Project boundary is not located on any federally recognized Native American reservation lands. Historically (at the time of EuroAmerican exploration), the Project area was used by the Shoshone, Bannock, and Northern Paiute peoples who conducted seasonal rounds in the Boise and Payette River basins.

#### ***4.9.1. Shoshone–Bannock Tribes of the Fort Hall Indian Reservation***

The headquarters for the Fort Hall Indian Reservation of the Shoshone–Bannock Tribes is located about 130 miles due east of the Project area.

The Fort Hall Reservation was created by executive order on June 14, 1867, and the Tribes signed the Fort Bridger Treaty on July 3, 1868. The reservation is the remnant of a much larger territory once occupied by the native peoples referred to today as the Shoshone-Bannock Tribes, which includes members of several once discrete groups, including the Northern Shoshone, the Bannock, the Lemhi, and the Western Shoshone. The Lemhi and Western Shoshone occupied their own separate territories until they were moved on to the Fort Hall Reservation, while the Bannocks and Northern Shoshone had already effectively combined by the time contact occurred with Euromericans. The Bannocks are Northern Paiutes that migrated into the area perhaps as late as the eighteenth century, adopting an equestrian lifestyle and becoming closely allied with the Northern Shoshone. During the period prior to Euromerican contact, all these tribes were relatively mobile hunting/gathering/foraging groups who frequently travelled over large distances throughout the course of each year to utilize natural subsistence resources.

Idaho Power does not currently have any data available about specific resources in the general area of the Project that may have cultural or religious significance to the Shoshone–Bannock Tribes.

#### ***4.9.2. Shoshone–Paiute Tribes of the Duck Valley Reservation***

The headquarters for the Duck Valley Indian Reservation of the Shoshone–Paiute Tribes is located approximately 110 miles south of the Project boundary. These tribes share interconnections with the tribes at Fort Hall, and there was considerable overlap in their traditional use areas, which jointly covered most of southern Idaho, western Utah, and northern Nevada. The Duck Valley Reservation was created by executive order in 1877 and was expanded by subsequent additional executive actions in 1886 and 1910. The tribes have an unratified treaty dating to 1855.

Idaho Power does not currently have any data available about specific resources in the general area of the Project that may have cultural or religious significance to the Shoshone–Paiute Tribes.

### **4.10. Socio-economic Resources (18 CFR § 5.6(d)(3)(xi))**

The Project is located solely in Ada County, Idaho. The population of Ada County is estimated at 535,799 according to U.S. Census Bureau 2024 estimates (Census Bureau 2025). This is an approximate 8.2% increase from 2020, when the population was 494,967 residents. In comparison, nationwide population only increased an estimated 2.6% over the same time period. In terms of population, Ada County is the most populous of Idaho's 44 counties.



The City of Boise is the county seat and largest city in Ada County with a reported population of 237,963 (Census Bureau 2025).

Ada County spans almost 1,055 square miles of “high desert beauty, peppered with golden foothills and a glistening river that winds through urban and rural landscapes.” (Ada County 2025). The county is home to the state capital, Boise, and five other cities—Star, Eagle, Meridian, Garden City, and Kuna. Ada County is Idaho’s commerce and industry center.

The Idaho Department of Labor (IDL) reports a 3.3% unemployment rate in Ada County for March 2025, compared to 3.7% unemployment statewide and 3.5% unemployment in the combined southwestern region of the state (IDL 2025). Unemployment in Ada County fell from nearly 6% in 2013 to 2.5% in 2018. The COVID pandemic years of 2019 to 2021 saw a spike of unemployment in Ada County to 5.5%, but since 2022, unemployment rates have remained fairly stable. The largest employers in Ada County include health care, education, government, and technology/manufacturing (IDL 2025). Ada County is a growing community, adding approximately 200,000 people in the last 25 years (Ada County 2022). It retains its agricultural heritage and balances it with open spaces for recreation. Ada County boasts easy access to mountains, the Boise and Snake rivers, lakes and reservoirs, hiking and biking trails, and designated wildlife areas.

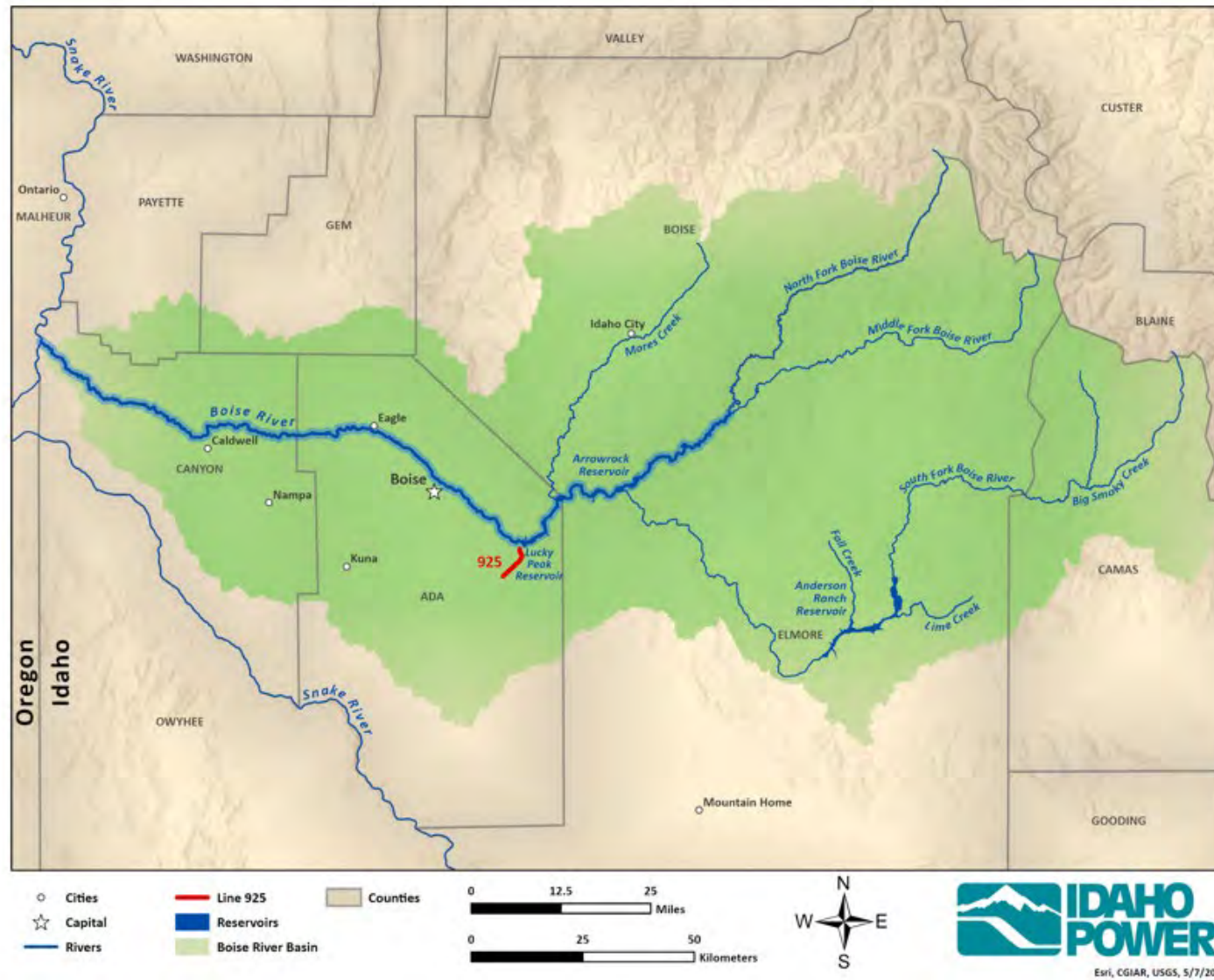
Per capita income for the State of Idaho is lower than the national average, and income in Ada County has consistently remained higher than statewide averages. In 2023 in Ada County, per capita income was \$72,588, while the average per capita income was \$59,385 statewide and \$68,531 nationwide.

Idaho Power proposes no changes to the Project and will continue with usual operations and maintenance (O&M). Idaho Power does not expect any adverse impacts to socio-economic resources based on continued Project operation.

#### **4.11. River Basin Description (18 CFR § 5.6 (d)(3)(xiii))**

The Project is not associated with a river, reservoir, lake, canal, or flume. See description in Section 4.2 (Water, Fish and Aquatic Resources) on the intermittent and ephemeral streams above which Line 925 crosses. Project operations do not affect tributary rivers or streams.

The Project is near the Boise River. The Boise River basin stretches over 100 miles across southwestern Idaho, with an approximate drainage area of 4,100 square miles (Figure 14). The headwaters start high in the Sawtooth Mountains at the confluence of the North Fork Boise and South Fork Boise Rivers, near the Boise and Elmore County borders in Idaho. Then, the Boise River flows westerly across Ada County, along downtown Boise, and into Canyon County, making its way to the Snake River west of Parma, Idaho. It terminates along the Idaho/Oregon border at river mile 392.3 of the Snake River. The basin extends across parts of Ada, Boise, Camas, Canyon, Elmore, Gem, and Payette Counties. The 64-mile stretch of the Lower Boise River subbasin starts at Lucky Peak Dam.



**Figure 14**  
Boise River Basin



The Boise River currently has three major instream impoundments along its path. In order of upstream to downstream, they are Anderson Ranch, Arrowrock, and Lucky Peak reservoirs. The USACE and Bureau of Reclamation coordinate and operate the trio of dams. The Project is also near Lucky Peak Reservoir.

The Boise River basin offers 26 active dams of various ownership: 11 are federal, 7 are local government, 6 are private, and 2 are State of Idaho (USACE National Inventory of Dams 2025). Four of the dams are on the Boise River—Arrowrock Dam, Lucky Peak Dam, Boise River Diversion Dam, and Barber Dam. Idaho Power does not own or operate any of the dams on the Boise River.

Water is diverted from the Boise River via several canals downstream from Lucky Peak Dam, including the New York Canal, Ridenbaugh Canal, and Farmer's Union Canal, and may be further distributed via laterals, ditches, and other delivery systems.

Major land uses in the Boise River basin are shrub/scrub, herbaceous, and forest. The next tier of land use includes cultivated crops, developed (open space), developed (low intensity), and hay/pasture. Major consumptive water use is primarily irrigation and the collective category of domestic, commercial, municipal, and industrial. Users rely on both surface water and groundwater.

Major land use in the Project area is non-irrigated livestock grazing and recreation. Excluding the Boise River, what little surface water is available in the Project area is used for wildlife and stock, dependent on rainfall and the intermittent and ephemeral streams. There is one diversion of record from Lydle Gulch (BLM right for stockwater) in the Project area (IDWR 2025). Other active water rights in the Project area are groundwater domestic and Boise River diversions for irrigation, power, storage, and municipal uses.

## **5. Preliminary Issues and Studies List for Each Resource Area (18 CFR §§ 5.6(d)(4)(i), (ii))**

The primary purpose of the PAD is to identify environmental resources that may be affected by the Project and to inform the development of any proposed studies to assess the scope of potential Project impacts. Idaho Power proposes to continue operating the Project as originally licensed. Idaho Power is not proposing any changes to the Project's operations under the new license. Therefore, the Project will not result in any new adverse impacts on environmental resources. Idaho Power believes sufficient information exists to assess resource concerns but recognizes additional analysis may be warranted for cultural resources.

### **5.1. Geology and Soils**

Idaho Power believes the geology and soils discussion in Section 4.1 is sufficient, and no additional analysis or studies are proposed.

## 5.2. Water, Fish, and Aquatic Resources

Idaho Power believes the water, fish and aquatic resources discussion in Section 4.2 is sufficient, and no additional analysis or studies are proposed.

## 5.3. Botanical Resources, including Rare, Threatened, and Endangered Species

Idaho Power believes the botanical resources discussion in Section 4.3 is sufficient, and no additional analysis or studies are proposed.

## 5.4. Wildlife Resources, including Rare, Threatened, and Endangered Species

Idaho Power believes the wildlife resources discussion in Section 4.4 is sufficient, and no additional analysis or studies are proposed.

## 5.5. Wetlands, Riparian, and Littoral Habitat

Idaho Power believes the wetlands, riparian, and littoral habitat discussion in Section 4.5 is sufficient, and no additional analysis or studies are proposed.

## 5.6. Recreation and Land Use

Idaho Power believes the recreation and land use discussion in Section 4.6 is sufficient, and no additional analysis or studies are proposed.

## 5.7. Aesthetic Resources

Idaho Power believes the aesthetic resources discussion in Section 4.7 is sufficient, and no additional analysis or studies are proposed.

## 5.8. Cultural and Historical Resources

Idaho Power is not proposing any changes at the Project. The archaeological, cultural, and historic built resources located on federally administered lands within and near the Project boundary are well documented. The *Cultural Resource Inventory for the Boise Bench-Lower Malad Line (Line 410)* and the *Lucky Peak 138kV (Line 925) Tie-in Project, Ada, Elmore, and Twin Falls Counties, Idaho* (Woods 2024) was accepted by the BLM, Four Rivers Field Office as sufficient for its level of effort to identify and evaluate all new and previously recorded cultural resources on federal lands within the Project boundary. Additionally, Idaho Power recently issued *Cultural Resource Inventory for the Boise Bench-Lower Malad Line (Line 410)* and the

*Lucky Peak 138kV (Line 925) Tie-In Project, Ada, Elmore, and Twin Falls Counties, Idaho-Addendum (Kroll 2025) to clarify and supplement pursuant to USACE's comments.*

Idaho Power anticipates the need to conduct a cultural resources inventory of the approximately 2.4 miles of privately owned land within the Project boundary to document and evaluate the National Register eligibility of any resources that may be present.

## 5.9. Tribal Resources

Idaho Power believes the tribal resources discussion in Section 4.9 is sufficient, and no additional analysis or studies are proposed.

## 5.10. Socio-economic Resources

Idaho Power believes the socio-economic discussion in Section 4.10 is sufficient, and no additional analysis or studies are proposed.

## 5.11. River Basin Description

Idaho Power believes the river basin discussion in Section 4.11 is sufficient, and no additional analysis or studies are proposed.

# 6. Comprehensive & Resource Management Plans (18 CFR § 5.6(d)(4)(iii), (iv))

The PAD must include the relevant qualifying federal and state or tribal comprehensive waterway plans and relevant resource management plans.

Idaho Power has reviewed the April 2024 FERC List of Comprehensive Plans ([www.ferc.gov/media/comprehensive-plans](http://www.ferc.gov/media/comprehensive-plans)) applicable to Idaho and adopted by FERC pursuant to Section 10(a)(2)(A) of the FPA, 16 USC § 803(a)(2)(A). On April 27, 1988, FERC issued Order No. 481-A, revising Order No. 481, issued on October 26, 1987, establishing that the Commission will accord FPA section 10(a)(2)(A) comprehensive plan status to any federal or state plan that:

- Is a comprehensive study of 1 or more of the beneficial uses of a waterway(s);
- Specifies the standards, data, and methodology used; and
- Is filed with the secretary of the Commission.

According to FERC, a comprehensive plan should contain the following: 1) A description of the waterway(s) that are the subject of the plan, including pertinent maps detailing the geographic area of the plan; 2) a description of the significant resources of the waterway(s);

3) a description of the various existing and planned uses for the resources, and 4) a discussion of goals, objectives, and recommendations for improving, developing, or conserving the waterway(s) in relation to these resources. The plan should contain an examination of how the different uses will promote the overall public interest. The description of the significant resources in the area should contain the following elements:

1. Navigation
2. Power development
3. Energy conservation
4. Fish and wildlife
5. Recreational opportunities
6. Irrigation
7. Flood control
8. Water supply
9. Other aspects of environmental quality.

## 6.1. Qualifying Comprehensive Plans

FERC currently lists 64 state and federal comprehensive plans for Idaho. Of these, 18 are potentially relevant to the Project and were reviewed in the development of this PAD. Each relevant plan is listed below.

1. BLM. 2015. Record of Decision and Approved Resource Management Plan for the Great Basin Region, Including the Greater Sage-Grouse Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah. Washington, D.C. September 2015.
2. BLM. 2019. Idaho Greater Sage-Grouse Record of Decision and Approved Resource Management Plan Amendment. Boise, Idaho. March 2019.
3. Idaho Department of Parks and Recreation. 2022. 2023 Idaho Statewide Comprehensive Outdoor Recreation Plan. Boise, Idaho. August 2022.
4. Idaho Department of Water Quality. 2018. Water Quality Standards. Boise, Idaho.<sup>7</sup>
5. IDFG. 2005. Idaho comprehensive wildlife conservation strategy. Boise, Idaho. September 2005.
6. IDFG. 2008. Idaho mule deer management plan: 2008-2017. Boise, Idaho. March 2008.

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<sup>7</sup> The Idaho Department of Environmental Quality promulgates the Water Quality Standards. They can be found at IDAPA, Surface and Wastewater Division, 58.01.02 – Water Quality Standards.

7. IDFG. 2010. Mule deer initiative action plan. Boise, Idaho. 2010.
8. IDFG. 2014. Idaho Elk management plan: 2014-2024. Boise, Idaho. June 2014.
9. IDFG. 2017. Idaho State Wildlife Action Plan 2015. Boise, Idaho.
10. IDFG. 2023. Idaho State Wildlife Action Plan 2023. Boise, Idaho. January 2024.
11. Idaho Water Resource Board. 1992. Comprehensive state water plan: Upper Boise River Basin. Boise, Idaho. December 1992.
12. Idaho Water Resource Board. 1996. Comprehensive state water plan: South Fork Boise River sub-basin. Boise, Idaho. January 1996.
13. Idaho Water Resource Board. 2012. Idaho State water plan. Boise, Idaho. November 2012.
14. Northwest Power and Conservation Council. 1988. Protected areas amendments and response to comments. Portland, Oregon. Council Document 88-22. September 14, 1988.
15. Northwest Power and Conservation Council. 2022. The 2021 Northwest Power Plan. Portland, Oregon. Council Document 2022-03.
16. USFWS. 1986. Whooping Crane Recovery Plan. Department of the Interior, Albuquerque, New Mexico. December 23, 1986.
17. USFWS. 2013. Greater Sage-grouse (*Centrocercus urophasianus*) Conservation Objectives: Final Report. Denver, Colorado. February 2013.
18. Western Association of Fish and Wildlife Agencies. 2019. Western monarch butterfly conservation plan, 2019-2069.

## 6.2. Relevant Resource Management Plans

As part of its PAD due diligence, Idaho Power also identified the following plans which were not listed in FERC's current comprehensive plan list for Idaho. While the below plans are not listed qualifying comprehensive plans, they may be nonetheless relevant to the Project.

1. Ada County. 2016. Ada County 2025 Comprehensive Plan. Boise, Idaho. November 2016.
2. BLM. 2024. Four Rivers Field Office Resource Management Plan Record of Decision. Boise, Idaho. September 2024.
3. Boise River Enhancement Network. 2015. Boise River Enhancement Plan. Boise, Idaho.

4. IDFG. 2014. Boise River Wildlife Management Area 2014–2023 Management Plan. Nampa, Idaho. December 2014.
5. IDFG. 2019. Idaho Mule Deer Management Plan 2020–2025. Boise, Idaho. December 2019.
6. IDFG. 2024. Idaho Elk Management Plan 2024–2030. Boise, Idaho. July 2024.
7. Idaho Water Resource Board. 2012. Proposed Treasure Valley Comprehensive Aquifer Management Plan.
8. National Park Service. 1999. Management and Use Plan Update/Final Environmental Impact Statement Oregon National Historic Trail.
9. USACE. 1988. Lucky Peak Master Plan. Walla Walla District, Walla Walla, Washington. July 27, 1988.
10. USACE. 2024. Lucky Peak Master Plan Draft. Walla Walla District, Walla Walla, Washington.

## 7. Summary of Contacts (18 CFR § 5.6(d)(5))

During the development of the PAD, Idaho Power conducted voluntary in-person, telephonic, email, and/or written letter pre-PAD consultation discussions with the entities listed below. In the discussions, Idaho Power explained the relicensing process, the purpose of the PAD, and our intent to use the TLP, answered questions and clarified understanding, reviewed resource information, and sought additional information to support the PAD development. No significant controversies were raised during the discussions. Idaho Power also invited the Shoshone–Bannock and Shoshone–Paiute Tribes to schedule meetings for discussion, but to date, neither Tribe has requested a pre-PAD meeting.

**Table 7**

Pre-PAD consultation record—summary of contacts. If more than one contact, the date of the earliest is listed.

Entity	Date	Interested Parties
Lucky Peak Hydroelectric Facility	6/19/2024	Sarah Higer
Shoshone–Bannock Tribes	3/18/2025	Lee Juan Tendoy, Louise Dixey, Carolyn Boyer Smith
Shoshone–Paiute Tribes	3/18/2025	Brian Mason, Jade Roubideaux
U.S. Army Corps of Engineers	4/24/2025	Tony Ames, Keith Hyde, Christopher Silbernagel, Royce Johnson, John Hook
Idaho Department of Environmental Quality	4/29/2025	Tambra Phares
Idaho State Historic Preservation Office	5/1/2025	Chris Shaver

Entity	Date	Interested Parties
Idaho Department of Fish & Game	5/2/2025	Tom Bassista
Idaho Department of Parks and Recreation	5/2/2025	Adam Zaragoza, Theresa Perry, Zack Grogan, Surat Nicol, Pamela Huck
Idaho Office of Energy and Minerals	5/2/2025	Cally Younger
U.S. Bureau of Land Management	5/5/2025	Becky Lazdauskas
Ada County	5/6/2025	Tom Dayley
U.S. National Park Service	5/6/2025	Wade Vagias
U.S. Fish and Wildlife Service	5/8/2025	Erin Kenison

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**Exhibit A**

Lucky Peak Transmission Line 925 original license

15 FERC P 62402 (F.E.R.C.), 1981

**\*\*1 Office Director Orders**

Idaho Power Company

Project No. 3104

Order Issuing License (Transmission Line)

(Issued June 30, 1981)

**\*63690** William W. Lindsay, Director, Office of Electric Power Regulation.

The Idaho Power Company (Applicant) filed on March 26, 1980, and supplemented on August 18, 1980, an application for license for the proposed Lucky Peak Transmission Line Project, FERC No. 3104.<sup>1</sup> The 4.28-mile long 138-kV transmission line would be located ten miles southeast of the City of Boise in Ada County, Idaho, and would interconnect the Lucky Peak Power Plant Project, FERC No. 2832<sup>2</sup> to the Applicant's transmission system. The transmission line is a primary line as defined by Sec. 3(11) of the Federal Power Act, [16 U.S.C. 796(11)].

*Description of Project*

The proposed project would consist of a 3-phase, single-circuit, 138-kV transmission line, supported on wooden 2-pole, H-frame towers, extending from the Lucky Peak Power Plant to the Applicant's existing Lower Malad-Boise Bench 138-kV transmission line. The transmission line would require a 60-foot wide right-of-way, 30 feet on each side of the centerline. The total right-of-way would require approximately 31.16 acres of land. About 13.04 acres are U.S. lands under the management of the U.S. Army Corps of Engineers and the Bureau of Land Management. The remainder of the land is in private ownership. The Applicant would obtain all necessary rights to these lands.

*Public Notice and Agency Comments*

Public notice of the filing of the application was given on October 24, 1980, as the last day for filing comments, protest or petitions to intervene. No protests or petitions to intervene have been filed.

**\*63691** The Idaho Department of Fish and Game (IDFG) and U.S. Fish and Wildlife Service (FWS) recommended that the support structures be designed to minimize any adverse impacts on raptors. The FWS recommended the placement of a nesting structure at each one mile interval and the erection of perching bars where terrain and habitat conditions are conducive. Special Article 18 has been included in this license to require the Licensee to develop a plan for minimizing any adverse effects on raptors.

*Threatened or Endangered Species of Plants*

The Applicant stated that the Wallowa Primrose (*Primula cusickiana*), which has been recommended for listing as an endangered plant species, might occur within the project area, and that prior to construction, a plant survey would be conducted to ensure that the proposed action would not adversely affect this species. If the proposed plant survey identifies *Primula cusickiana* as occurring within the project area, other mitigative measures would be required to protect this species.

Special Article 19 has been included in this license requiring the Licensee to conduct a plant survey of the project area and, if any specimens of *Primula cusickiana* are identified, to take appropriate protective measures.

*Other Environmental Matters*

The construction of the transmission line which could entail clearing operations for staging areas, pole placement, and short access roads would be confined to small areas and involve the removal of shrubby vegetation. Damage to vegetation would result from vehicular traffic in level areas where road construction would not be required.

**\*\*2** Some wildlife species would be displaced during construction, but would return upon termination of construction activities. The transmission line would be visible from portions of State Highway 21 and to visitors at Discovery State Park. The visual impact would be minimal because of the character of the terrain and the use of wooden poles that would blend with the sparsely vegetated landscape.

The transmission line would be constructed near a historic site that has been proposed for nomination to the National Register

of Historic Places, and an archeological site that has been excavated under the direction of the U.S. Army Corps of Engineers. The line would cross the Oregon Trail at one point and would be within one mile of an historic observation point. The proposed line would be visible from all of the sites with the exception of the observation point. The State Historical Preservation Officer stated that archeological and historic sites do occur in the area but that the project would have no effect on these sites if they were avoided during construction activities.

The integrity of these sites would be adversely affected by the close proximity of the transmission line nor would they be damaged during project construction. Applicant stated that a cultural survey of the right-of-way would be completed prior to construction activities, and mitigative measures would be prescribed to protect any identified sites. Special Article 20 of this license requires the Licensee to provide protection of any archeological and historic sites in the area during construction.

On the basis of the record, including agency comments and the staff's independent analysis, issuance of this license for the proposed project, as conditioned, is not a major Federal action significantly affecting the quality of the human environment.

#### *Annual Charges*

In accordance with past practice for transmission line licenses an annual charge of \$200.00 is deemed adequate for reimbursing the United States for the costs of administering Part I of the Act.

The amount of public land under the jurisdiction of the Corp of Engineers and the Bureau of Land Management that will be occupied by the proposed transmission line will be more accurately determined when as-built exhibits are filed as required by Article 17. Under Article 16 the annual charges for the use of this land would be determined after the as-built exhibits are filed for approval.

#### *It is ordered that:*

(A) This license is issued under Part I of the Federal Power Act to the Idaho Power Company of Boise, Idaho for a period effective the first day of the month following issuance of this license and terminating May 31, 2030, for the construction, operation, and maintenance of the Lucky Peak Transmission Line Project No 3104 located in Ada County, Idaho, on lands of the United States under the management of the U.S. Army Corps of Engineers and the Bureau of Land Management, subject to the terms and conditions of the Act which is incorporated by reference as part of this license, and subject to such rules and regulations as the Commission \*63692 issues or prescribes under the provisions of the Act.

**\*\*3** (B) Project No. 3104 consisting of:

(i) all lands, to the extent of the Licensee's interests in those lands, constituting the project area and enclosed by the project boundary, the project boundary and area being shown and described by the exhibit which forms part of the application for license which is designated and described as:

#### TABULAR OR GRAPHIC MATERIAL SET FORTH AT THIS POINT IS NOT DISPLAYABLE

(ii) project works consisting of: a 4.28-mile long, 3-phase, single-circuit, 138-kV transmission line, supported on wooden 2-pole, H-frame towers extending from the Lucky Peak Power Plant, FERC No. 2832, to the Idaho Power Company's existing Lower Malad-Boise Bench 138-kV transmission line; and appurtenant facilities—the location, nature, and character of which are more specifically shown and described by the exhibit cited above and by Exhibit M of the application for license which consists of two typewritten pages, and titled Exhibit M-N-O (3-19-80).

(iii) all of the structures, fixtures, equipment, and facilities used or useful in the maintenance and operation of the project and located on project land, and such other property as may be used or useful in connection with the project or any part of it, whether located on or off project land, to the extent that the inclusion of such property as part of the project is approved or acquiesced in by the Commission; together with all riparian or other rights, the use or possession of which is necessary or appropriate in the maintenance or operation of the project.

(C) This license is also subject to the terms and conditions set forth in Form L-21 (Revised October, 1975, 54 FPC 1923) entitled "Terms and Conditions of License for Unconstructed Transmission Line Project." These terms and conditions, designated as Articles 1 through 15, are made a part of the license. This license is also subject to the following special conditions set forth as additional articles:

*Article 16.* The Licensee shall pay the United States the following annual charge, effective the first day of the month

following issuance of this license:

(a) For the purpose of reimbursing the United States for the costs of administration of Part I of the Act, an annual charge of \$200.00, or such amount as may be determined by the Federal Energy Regulatory Commission in accordance with the provisions of its regulations, in effect from time to time; and

(b) For the purpose of recompensing the United States for the use, occupancy, and enjoyment of its lands for transmission line rights of way, an amount as may be determined from time to time pursuant to the Commission's regulations.

*Article 17.* Within one year after commencement of operation of the project, the Licensee shall file, for approval, Exhibits J, K, and M, conforming to the Commission's regulations at that time, showing the actual land occupied by the project and describing the project works and facilities as constructed.

*Article 18.* The Licensee, following consultation with the U.S. Fish and Wildlife Service and the Idaho Department of Fish and Game, shall prepare and file with the Commission, at least 60 days prior to commencement of construction, its plan for minimizing any adverse impacts on raptors that could result from construction and operation of the transmission line. Unless otherwise modified by the Commission, the Licensee shall adhere to the plan.

**\*\*4** *Article 19.* The Licensee, following consultation with the Endangered Species Office of the U.S. Fish and Wildlife Service, and at least 60 days prior to any ground disturbing activity, shall file a report with the Commission stating the results of a plant survey conducted by a professional botanist to identify the presence, if any of *Primula cusickiana*. The report shall include any protection measures to be implemented by the Licensee.

*Article 20.* The Licensee shall, by flagging, fencing, or other appropriate means, protect any identified archeological sites from construction related activities. If any previously unrecorded archeological or historic sites are discovered during the course of construction, construction activity in the vicinity shall be halted, a qualified archeologist shall be consulted to determine the significance of the sites, and the Licensee shall consult with the State Historic Preservation Officer (SHPO) to develop a mitigation plan for the protection of significant archeological or historic resources. The Licensee shall make available funds in a reasonable amount for any archeological work as required. If the Licensee and the SHPO cannot agree on the amount of money to be expended on archeological or historic work related to the project, the Commission reserves the right to require the Licensee to conduct, at its own expense, any such work found necessary.

*Article 21.* (a) In accordance with the provisions of this article, the Licensee shall have the authority to grant permission for certain types of use and occupancy of project **\*63693** lands and waters and to convey certain interests in project lands and waters for certain other types of use and occupancy, without prior Commission approval. The Licensee may exercise the authority only if the proposed use and occupancy is consistent with the purposes of protecting and enhancing the scenic, recreational, and other environmental values of the project. For those purposes, the Licensee shall also have continuing responsibility to supervise and control the uses and occupancies for which it grants permission, and to monitor the use of, and ensure compliance with the covenants of the instrument of conveyance for, any interests that it has conveyed, under this article. If a permitted use and occupancy violates any condition of this article or any other condition imposed by the Licensee for protection and enhancement of the project's scenic, recreational, or other environmental values, or if a covenant of a conveyance made under the authority of this article is violated, the Licensee shall take any lawful action necessary to correct the violation. For a permitted use or occupancy, that action includes, if necessary, cancelling the permission to use and occupy the project lands and waters and requiring the removal of any non-complying structures and facilities.

(b) The types of use and occupancy of project lands and waters for which the Licensee may grant permission without prior Commission approval are: (1) landscape plantings; (2) non-commercial piers, landings, boat docks, or similar structures and facilities; and (3) embankments, bulkheads, retaining walls, or similar structures for erosion control to protect the existing shoreline. To the extent feasible and desirable to protect and enhance the project's scenic, recreational, and other environmental values, the Licensee shall require multiple use and occupancy of facilities for access to project lands or waters. The Licensee shall also ensure, to the satisfaction of the Commission's authorized representative, that the uses and occupancies for which it grants permission are maintained in good repair and comply with applicable State and local health and safety requirements. Before granting permission for construction of bulkheads or retaining walls, the Licensee shall: (1) inspect the site of the proposed construction, (2) consider whether the planting of vegetation or the use of riprap would be adequate to control erosion at the site, and (3) determine that the proposed construction is needed and would not change the basic contour of the reservoir shoreline. To implement this paragraph (b), the Licensee may, among other things, establish a program for issuing permits for the specified types of use and occupancy of project lands and waters, which may be subject to the payment of a reasonable fee to cover the Licensee's costs of administering the permit program. The Commission reserves the right to require the Licensee to file a description of its standards, guidelines, and procedures for implementing this

paragraph (b) and to require modifications of those standards, guidelines, or procedures.

**\*\*5** (c) The Licensee may convey easements or rights-of-way across, or leases of, project lands for: (1) replacement, expansion, realignment, or maintenance of bridges and roads for which all necessary State and Federal approvals have been obtained; (2) storm drains and water mains; (3) sewers that do not discharge into project waters; (4) minor access roads; (5) telephone, gas, and electric utility distribution lines; (6) non-project overhead electric transmission lines that do not require erection of support structures within the project boundary; (7) submarine, overhead, or underground major telephone distribution cables or major electric distribution lines (69-kV or less); and (8) water intake or pumping facilities that do not extract more than one million gallons per day from a project reservoir. No later than January 31 of each year, the Licensee shall file three copies of a report briefly describing for each conveyance made under this paragraph (c) during the prior calendar year, the type of interest conveyed, the location of the lands subject to the conveyance, and the nature of the use for which the interest was conveyed.

(d) The Licensee may convey fee title to, easements or rights-of-way across, or leases of project lands for: (1) construction of new bridges or roads for which all necessary State and Federal approvals have been obtained; (2) sewer or effluent lines that discharge into project waters, for which all necessary Federal and State water quality certificates or permits have been obtained; (3) other pipelines that cross project lands or waters but do not discharge into project waters; (4) non-project overhead electric transmission lines that require erection of support structures within the project boundary, for which all necessary Federal and State approvals have been obtained; (5) private or public marinas that can accommodate no more than 10 watercraft at a time and are located at least one-half mile from any other private or public marina; (6) recreational development consistent with an approved Exhibit R or approved report on recreational resources of an Exhibit E; and (7) other uses, if: (i) the amount of land conveyed for a particular use is five acres or less; (ii) all of the land conveyed is located at least 75 feet, measured horizontally, from the edge of the project reservoir at normal maximum surface elevation; and (iii) no more than 50 total acres **\*63694** of project lands for each project development are conveyed under this clause (d)(7) in any calendar year. At least 45 days before conveying any interest in project lands under this paragraph (d), the Licensee must file a letter to the Director, Office of Electric Power Regulation, stating its intent to convey the interest and briefly describing the type of interest and location of the lands to be conveyed (a marked Exhibit G or K map may be used), the nature of the proposed use, the identity of any Federal or State agency official consulted, and any Federal or State approvals required for the proposed use. Unless the Director, within 45 days from the filing date, requires the Licensee to file an application for prior approval, the Licensee may convey the intended interest at the end of that period.

**\*\*6** (e) The following additional conditions apply to any intended conveyance under paragraphs (c) or (d) of this article:

(1) Before conveying the interest, the Licensee shall consult with Federal and State fish and wildlife or recreation agencies, as appropriate, and the State Historic Preservation Officer.

(2) Before conveying the interest, the Licensee shall determine that the proposed use of the lands to be conveyed is not inconsistent with any approved Exhibit R or approved report on recreational resources of an Exhibit E; or, if the project does not have an approved Exhibit R or approved report on recreational resources, that the lands to be conveyed do not have recreational value.

(3) The instrument of conveyance must include covenants running with the land adequate to ensure that: (i) the use of the lands conveyed shall not endanger health, create a nuisance, or otherwise be incompatible with overall project recreational use; and (ii) the grantee shall take all reasonable precautions to ensure that the construction, operation, and maintenance of structures or facilities on the conveyed lands will occur in a manner that will protect the scenic, recreational, and environmental values of the project.

(4) The Commission reserves the right to require the Licensee to take reasonable remedial action to correct any violation of the terms and conditions of this article, for the protection and enhancement of the project's scenic, recreational, and other environmental values.

(f) The conveyance of an interest in project lands under this article does not in itself change the project boundaries. The project boundaries may be changed to exclude land conveyed under this article only upon approval of revised Exhibit G or K drawings (project boundary maps) reflecting exclusion of that land. Lands conveyed under this article will be excluded from the project only upon a determination that the lands are not necessary for project purposes, such as operation and maintenance, flowage, recreation, public access, protection of environmental resources, and shoreline control, including shoreline aesthetic values. Absent extraordinary circumstances, proposals to exclude lands conveyed under this article from the project shall be consolidated for consideration when revised Exhibit G or K drawings would be filed for approval for other purposes.



(D) Exhibits J and K (submitted on November 12, 1980), and Exhibit M designated and described in Ordering Paragraph (B) are approved and made part of the license only to the extent that they generally show and describe the project.

(E) This order is final unless a petition appealing it to the Commission is filed within 30 days from the date of its issuance, as provided in Section 1.7(d) of the Commission's regulations, 18 C.F.R. 1.7(d) (1979), *as amended*, [44 Fed. Reg. 46449 \(1979\)](#). The filing of a petition appealing this order to the Commission or an application for rehearing as provided in Section 313(a) of the Act does not operate as a stay of the effective date of this license or of any other date specified in this order, except as specifically ordered by the Commission. The Licensee's failure to file a petition appealing this order to the Commission shall constitute acceptance of this license. In acknowledgment of acceptance of this license and its terms and conditions, it shall be signed by the Licensee and returned to the Commission within 60 days from the date this order is issued.

Federal Energy Regulatory Commission

Footnotes

<sup>1</sup> Authority to act on this matter is delegated to the Director, Office of Electric Power Regulation under [18 C.F.R. §375.308 \(1980\)](#), *as amended by* [46 Fed. Reg. 14119 \(1981\)](#).

<sup>2</sup> The license for the 87.48 MW Lucky Peak Power Plant Project No. 2832 was issued on June 10, 1980, to the Boise Project Board of Control.

Document Content(s)

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