Appendix N

Framework Dust Control and Air Quality Plan

Gateway West Transmission Line Project

Prepared by:

PacifiCorp
1407 W. North Temple
Salt Lake City, UT 84116

and

Idaho Power Company
1221 West Idaho Street
Boise, ID 83702

May 2012

TABLE OF CONTENTS

1.0 INTRODUCTION

Rocky Mountain Power and Idaho Power Company (Companies) are proposing to construct and operate approximately 1,000 miles of new 230-kilovolt (kV), 345-kV and 500-kV alternating current electric transmission system, called the Gateway West Transmission Line Project (Project), consisting of 10 segments between the Windstar Substation at Glenrock, Wyoming, and the Hemingway Substation approximately 30 miles southwest of Boise, Idaho. The proposed transmission line is needed to supplement existing transmission lines in order to relieve operating limitations, increase capacity, and improve reliability in the existing electric transmission grid, allowing for the delivery of up to 1,500 megawatts of additional energy for the Companies' larger service areas and to other interconnected systems. The Project includes ground-disturbing activities associated with the construction of above-ground, single-circuit transmission lines involving towers, access roads, multiuse areas, fly yards, and pulling sites as well as associated substations, communication sites, and electrical supply distribution lines. The Project crosses private land and public lands administered by the Bureau of Land Management (BLM), U.S. Forest Service (Forest Service), and the states of Idaho and Wyoming.

This Framework Dust Control and Air Quality Plan addresses regulatory compliance, environmental concerns, mitigation recommendations, and monitoring. This plan will be utilized for the construction of the Project to ensure impacts associated with construction activities are minimized as they relate to soil conservation and air quality.

2.0 PURPOSE

This plan provides measures to be utilized by the BLM, Compliance Inspection Contractor (CIC), and the Construction Contractor to ensure protection of the soils and air quality that will be affected by the Project. This plan is to be implemented during the construction, operation, and maintenance phases of the Project. These measures are intended to 1) address soil erosion and sedimentation, and 2) minimize dust and air emissions from construction-related activities. This document provides a template for the detailed Final Dust Control and Air Quality Plan to be developed by the Construction Contractor.

3.0 REGULATORY COMPLIANCE

Construction, operation, and maintenance activities for the Project are subject to various regulations designed to protect environmental resources and the public from erosion, dust, and other possible effects to air quality. The following permits and documents contain requirements for preventing accelerated erosion and minimizing dust and air emissions. Refer to these documents, along with this plan, when assessing which mitigation measures are appropriate for a specific area. At a minimum, the Companies and the Construction Contractor will need to adhere to or obtain the following permits.

3.1 Federal Permits

- BLM – Right-of-way grant and temporary use permit: Federal Land Policy and Management Act of 1976 (Public Law 94-579); 43 United States Code (U.S.C.) 1761-1771; 43 Code of Federal Regulations (CFR) 2800
- U.S. Army Corps of Engineers (USACE) – Clean Water Act (CWA), Section 401: CWA (33 U.S.C. 1344)
- U.S. Environmental Protection Agency (USEPA) National Pollutant Discharge Elimination System (NPDES) Construction General Permit

3.2 State Permits

- Wyoming Department of Environmental Quality (WDEQ) – Air Quality Division Construction Permit to control fugitive dust emissions during construction.
- WDEQ – Sections 401, 402, and 404, CWA, Water Quality Certification (State implementation of the USACE permits for air quality and stormwater discharges).
- Idaho Department of Environmental Quality (IDEQ) – Fugitive dust control plan for construction projects.
- IDEQ – State implementation of the USACE CWA Section 401, 402, and 404 permits.

3.3 Local Permits

- County conditional use permits, temporary use permits for staging areas, road crossing permits and/or encroachment permits. May have erosion or air quality considerations. Requirements vary by county.

4.0 ENVIRONMENTAL CONSIDERATIONS

4.1 Soil Conservation and Erosion

Soil conservation for the Project includes minimizing impacts that will affect soils from the construction and operation of the proposed transmission line, such as minimizing wind and water erosion, soil compaction, surface disturbance, and construction activities in wet soils. Prior to ground disturbance, geotechnical studies have been conducted and a report for affected areas has been prepared to provide more specific detail/measures regarding soil conservation for the Project.

Erosion potential is the result of several factors including slope, vegetation cover, climate, and the physical and chemical characteristics of the soil. Increased soil erosion may occur when vegetation is removed during construction, or in areas where the surface is disturbed by heavy equipment. Increased water erosion often occurs during high-intensity or long-duration rainstorms and may reduce the productivity of the soil as well as affect water quality of streams by accelerating sediment loading. Wind is also an erosion factor throughout portions of the Project areas. Soil compaction could also be a concern if there is repeated traffic use on sections of access roads.

Where disturbance is anticipated in areas of steep terrain with high potential for erosion; vegetation clearing and grading will be conducted in a manner to minimize these effects. Soil stabilization and reclamation practices will also be implemented to reduce erosion. In select locations, helicopter construction may be used to further reduce these impacts. In areas of soil compaction (e.g., temporary access roads) soil treatment and reclamation will be implemented as directed in Appendix D – Framework Reclamation Plan. In these areas, care should be taken to avoid any installed grounding or counterpoise.

4.2 Air Quality and Dust Control

Construction of the transmission line and related facilities will cause a temporary and minimal increase in fugitive dust. Ambient levels of nitrogen oxides, hydrocarbons, and carbon monoxide near the construction zone will also be temporarily increased due to emissions from heavy construction equipment. Related facilities will cause a minimal increase in fugitive dust.

Air quality control measures are intended to minimize fugitive dust and air emissions and to maintain conditions as free from air pollution where practical. All requirements of those entities having jurisdiction over air quality matters will be adhered to, and any permits needed for construction activities will be obtained. The Construction Contractor will not proceed with any construction activities without taking reasonable precautions to prevent excessive particulate matter from becoming airborne and creating nuisance conditions.

Excessive exhaust emissions from vehicles and heavy equipment will be prevented by proper maintenance, and no open burning of construction trash or other open fires will be allowed.

Where necessary, water or magnesium chloride ($MgCl_2$) may be used as BLM-approved dust control methods during construction, including the grading of roads or the clearing of land and of the right-of-way, and will be applied on unpaved roads, material stockpiles, and other surfaces, which can create airborne dust. Where application of water is not possible, material stockpiles will be enclosed or covered. In addition, open-bodied trucks transporting materials likely to become airborne will be covered. Earth or other materials that may become airborne will promptly be removed from paved roads. Matting will be used in rock blasting operations to minimize and control dust (see Appendix M – Framework Blasting Plan).

5.0 MITIGATION MEASURES

Mitigation measures will be applicable to Project construction, reclamation, operation, and maintenance. If new disturbances occur during the operation and maintenance phases of the Project, or if erosion control and air quality measures implemented during construction and reclamation are not effective in dust control and maintaining air quality, the mitigation measures will be reviewed and modified where necessary.

Because of potential impacts from construction activities, several measures may be necessary to mitigate particular impacts. Proposed erosion, dust control, and air quality

protection measures that will be included in the final Dust Control and Air Quality Plan are included in Appendix Z of the Plan of Development (POD).

6.0 MONITORING MEASURES

Monitoring of erosion control mitigation measures will continue until reclamation efforts are considered complete and successful, and accelerated erosion and air emissions have been controlled. Proposed erosion, dust control, and air quality monitoring measures are included in Appendix Z of the POD.

7.0 OPERATION AND MAINTENANCE PHASE

After construction and reclamation, monitoring the erosion control mitigation measures will continue on an annual basis during the operation and maintenance phase until affected soils have been stabilized. Monitoring should continue until there is no or minimal accelerated erosion or air emissions and until reclamation efforts are considered complete and successful.