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February 21, 2023

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
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**Re: Docket No. PCN 5 – In the Matter of Idaho Power Company’s Petition for Certificate of Public Convenience and Necessity.**

Attention Filing Center:

Attached for filing in the above-referenced docket is Idaho Power Company’s Reply Testimony and Exhibits of Michael Ottenlips (Idaho Power/1400-1402).

Please contact this office with any questions.

Thank you,

A handwritten signature in black ink that reads 'Alisha Till'.

Alisha Till  
Paralegal

Attachments

## DOCKET PCN 5 - CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2023 Idaho Power Company's Reply Testimony of Michael Ottenlips was served by USPS First Class Mail and Copy Center to said person(s) at his or her last-known address(es) as indicated below:

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DATED: February 21, 2023

/s/ Alisha Till

Alisha Till  
Paralegal

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**DOCKET PCN 5**

In the Matter of )  
IDAHO POWER COMPANY'S )  
PETITION FOR A CERTIFICATE OF )  
PUBLIC CONVENIENCE AND )  
NECESSITY. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY  
REPLY TESTIMONY  
OF  
MICHAEL OTTENLIPS**

**FEBRUARY 21, 2023**

**Exhibit List**

- Idaho Power/1401 - Curriculum Vitae of Michael Ottenlips
- Idaho Power/1402 - Survey Results from Rice Glass Hill Parcel

1 **Q. Please state your name, employer, and business address.**

2 A. My name is Michael Ottenlips. My employer is Tetra Tech, and my business address is  
3 3380 Americana Terrace, Suite 201 Boise, ID 83706. Tetra Tech is an environmental  
4 consulting firm, and is currently providing support for Idaho Power Company ("Idaho  
5 Power") in its state and federal permitting for the Boardman to Hemingway Transmission  
6 Line Project ("B2H" or "Project").

7 **Q. Please describe your educational and professional experience.**

8 A. I graduated with a bachelor's degree in Biology in 2014 from Hendrix College in Conway,  
9 Arkansas where I took multiple courses in botany and ecology. After college I worked as  
10 a field technician identifying plants for the Missouri Department of Conservation, the  
11 Student Conservation Association, and the United States Forest Service. From 2016 to  
12 2019, I attended graduate school at Boise State University where I studied plant  
13 systematics with Dr. James Smith. In graduate school I studied evolutionary relationships  
14 and the ecology of biscuitroot species (*Lomatium* spp.), a group native to the  
15 intermountain West. I obtained a Master of Science in Biology in 2019; portions of my  
16 thesis were published in peer-reviewed academic journals (American Journal of Botany;  
17 International Journal of Plant Sciences). After graduate school, I worked at the United  
18 States Forest Service Rocky Mountain Research station for just under a year coordinating  
19 and conducting botanical fieldwork. I have been a full-time biologist at Tetra Tech since  
20 April 2020, where I primarily coordinate and perform botanical surveys, conduct spatial  
21 analysis, and assist in the preparation of various environmental review documents related  
22 to the Endangered Species Act, National Environmental Protection Act ("NEPA"), and the  
23 Oregon Energy Facility Siting Council ("EFSC") process. A copy of my CV is attached to  
24 this testimony as Exhibit Idaho Power/1401.

25 **Q. What is your experience relevant to the B2H Project?**

1 A. The first year I worked extensively on B2H was 2021 performing Terrestrial Visual  
2 Encounter Surveys ("TVES") for about 15 days in Baker and Union Counties. Some of  
3 these surveys took place in the Blue Mountains. I led the noxious weed and special status  
4 plant species surveys of the EFSC site boundary in 2022. I have also assisted in preparing  
5 the Project's Noxious Weed and Reclamation and Revegetation Plans.

6 **Q. Were you involved in selecting the route of the Project or considering alternatives?**

7 A. No. None of the activities I worked on involved comparing alternatives or any  
8 considerations to the siting history. I simply analyzed data or coordinated fieldwork within  
9 the EFSC site boundary.

10 **Q. What is the scope and purpose of your response testimony?**

11 A. In this testimony, I will briefly summarize the various route segments through Union  
12 County that Idaho Power has considered and analyzed. I will then summarize the methods  
13 and results of the special status plant species and noxious weed survey performed within  
14 the Project's EFSC site boundary on Dr. Joel Rice's property during the 2022 field season.  
15 Finally, I will summarize the testimony of an intervenor in this proceeding, Ms. Susan  
16 Geer, who has asserted that Idaho Power's selected route is more impactful than the other  
17 routes considered. Finally, I will respond to testimony from Ms. Geer's witness, Michael  
18 McAllister, who provided an analysis of the habitat present along two of those route  
19 segments, the Morgan Lake Alternative and the Glass Hill Alternative.

20 **Q. Please summarize your testimony.**

21 A. Idaho Power considered several potential routes through Union County for the Project,  
22 including the Mill Creek Route, the Morgan Lake Alternative, and the Glass Hill Alternative.  
23 My understanding is that in this docket, the route proposed by Idaho Power includes the  
24 Morgan Lake Alternative, which I participated in surveying on behalf of the Company. I  
25 summarize the results of those surveys here. I next turn to intervenor assertions regarding  
26 habitat along the Morgan Lake Alternative. Ms. Geer asserts in her testimony that the

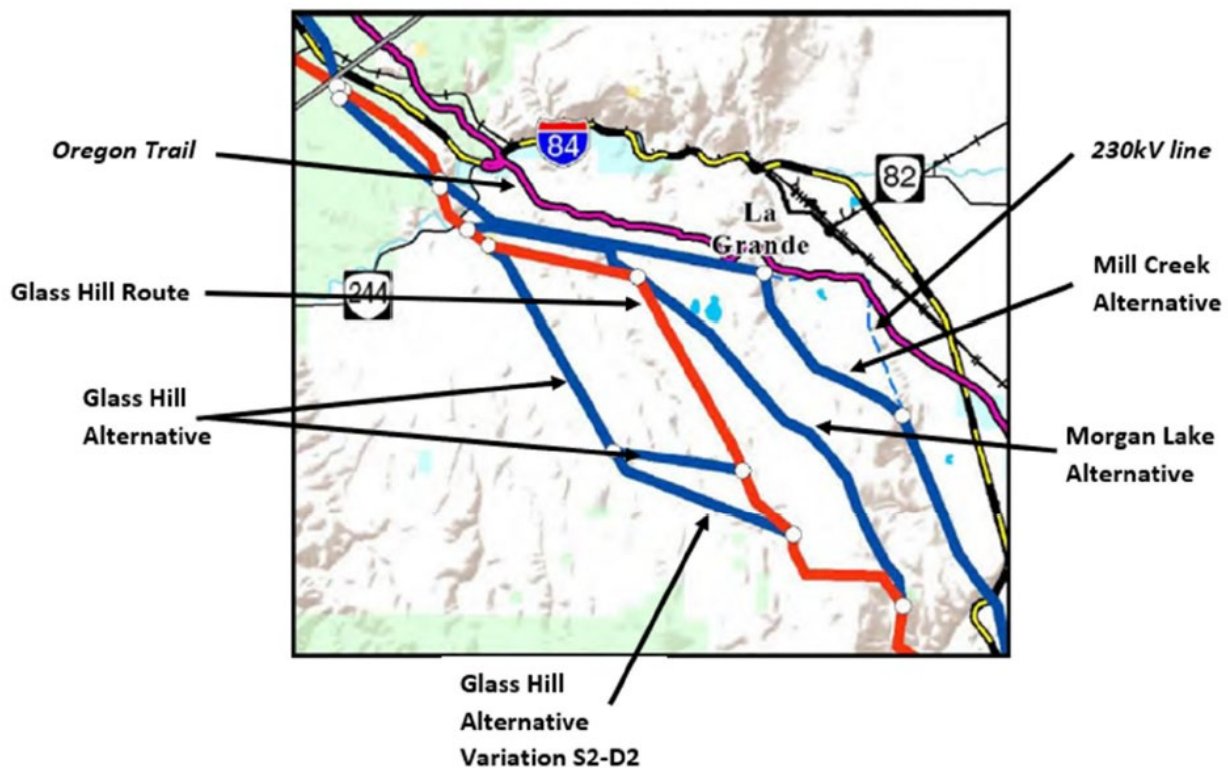
1 Morgan Lake Alternative would be the most impactful route and that the Glass Hill  
2 Alternative is a preferable alternative. However, Idaho Power has performed a desktop  
3 review of publicly available data of potential sensitive resources present along those two  
4 routes. These data show that there are similar resources present along both routes.  
5 Turning to Mr. McAllister's comments, although Mr. McAllister identifies the presence of  
6 several environmental resources along the Morgan Lake Alternative, Mr. McAllister does  
7 not fully consider the environmental resources along the Glass Hill Alternative.

8 **I. ROUTE SEGMENTS PROPOSED IN UNION COUNTY**

9 **Q. Please provide an overview of the different route segments Idaho Power considered**  
10 **in Union County.**

11 A. Throughout the various siting and review processes, Idaho Power considered multiple  
12 potential route segments through Union County. Throughout the site certificate process  
13 at the EFSC, Idaho Power proposed two routes: the Mill Creek Route and the Morgan  
14 Lake Alternative. Additionally, in the federal NEPA review, the Bureau of Land  
15 Management ("BLM") analyzed the Glass Hill Alternative. These routes are all shown in  
16 Figure 1 below.

1 **Figure 1. Routes in Union County**



2  
3 A more detailed summary of the siting history in Union County is provided in  
4 Section II of the testimony of Mitchell Colburn.<sup>1</sup>

5 **Q. Have you personally analyzed any of these routes?**

6 A. Yes. On August 16, 2022, three Tetra Tech staff members trained in plant identification  
7 performed botanical surveys on the portions of the Morgan Lake Alternative, including  
8 portions of Dr. Rice's property that comprise the Glass Hill State Natural Area within the  
9 EFSC site boundary (as discussed by Susan Geer).<sup>2</sup> These surveys were designed to  
10 satisfy the EFSC and BLM pre-construction requirements related to mapping populations

<sup>1</sup> See generally Idaho Power/600 (Feb. 21, 2023).

<sup>2</sup> The Tetra Tech team surveyed parcels 03S38E08400, 03S38E09200, 04S38E02300, 04S38E02400. Dr. Rice owns an additional parcel (03S38E09100) to the northwest of the area that was not surveyed in 2022.



1 of State of Oregon and Union County listed noxious weeds,<sup>3</sup> federally-listed threatened  
2 and endangered plant species, and Oregon Department of Agriculture threatened and  
3 endangered (“ODA T&E”) plant species.<sup>4</sup>

4 Additionally, I performed a desktop analysis of three routes through Union County  
5 (the Mill Creek Route, the Morgan Lake Alternative, and the Glass Hill Alternative<sup>5</sup>). The  
6 desktop analysis compared publicly available data of potential sensitive resources which  
7 intersect each route. These data included the National Wetland Inventory (“NWI”),  
8 National Hydrography Dataset (“NHD”), the Oregon Biodiversity Information Center  
9 (“ORBIC”) elemental occurrences of special status plant species, remoted sensed  
10 ecological data (“Re-GAP”), fish presence data (“StreamNet”), and elk and deer winter  
11 range data from Oregon Department of Fish and Wildlife (“ODFW”).

12 **Q. Which route does Idaho Power propose in its Petition for a Certificate of Public**  
13 **Convenience and Necessity (“CPCN”)?**

14 A. In Union County, Idaho Power seeks a CPCN for the Proposed Route as modified by the  
15 Morgan Lake Alternative.<sup>6</sup>

16 **Q. Why did Idaho Power select the Morgan Lake Alternative?**

17 A. I was not personally involved in the route selection in my survey work for the Project.  
18 Idaho Power’s route selection is more thoroughly discussed in the Reply Testimony of  
19 Mitchell Colburn, which is included in this docket as Idaho Power/600.

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<sup>3</sup> Idaho Power’s Supplement to Petition for CPCN, Attachment 1 (Final Order, Attachment 1, Site Certificate) at 777 of 10603 (Oct. 7, 2022) (requiring compliance with the Noxious Weed Plan) [hereinafter, “Final Order, Attachment 1”]; Idaho Power’s Supplement to Petition for CPCN, Attachment 1 (Final Order, Attachment P1-5, Updated Revised Draft Noxious Weed Plan) at 10050-51 of 10603 (Oct. 7, 2022) (detailing pre-construction inventory of noxious weeds) [hereinafter, “Final Order, Attachment P1-5”].

<sup>4</sup> Final Order, Attachment 1 at 779 of 10603.

<sup>5</sup> In the Final Environmental Impact Statement, BLM refers to this route as the Glass Hill Variation S2-D2. For ease of reference and because most intervenors refer to it as the BLM environmentally preferred or Glass Hill Alternative, Idaho Power refers to it as the “Glass Hill Alternative” in this this Reply Testimony. See generally Mitch Colburn’s Testimony, Idaho Power/600.

<sup>6</sup> Idaho Power Company’s Petition for CPCN at 15 (Sept. 30, 2022).

1 **Q. Have any intervenors in this docket raised issues concerning alternative routes**  
2 **through Union County?**

3 A. Yes. Ms. Susan Geer asserts in her Opening Testimony that the Morgan Lake Alternative  
4 has more habitat impacts than the other route options.<sup>7</sup> Ms. Geer also provided testimony  
5 from her witness, Mr. Michael McAllister, who compares the Morgan Lake Alternative to  
6 the Glass Hill Alternative.<sup>8</sup>

7 **II. IMPACTS FROM THE MORGAN LAKE ALTERNATIVE**

8 **Q. What habitat impacts does Ms. Geer assert will result from the Morgan Lake**  
9 **Alternative?**

10 A. Ms. Geer raises several potential impacts from the Project. Ms. Geer asserts that the  
11 Morgan Lake Alternative will affect high-elevation moist meadows,<sup>9</sup> specifically  
12 mentioning Twin Lake and Winn Meadow.<sup>10</sup> Additionally, Ms. Geer raises concerns  
13 regarding rare species on the property of Dr. Rice.<sup>11</sup> Finally, Ms. Geer states that the  
14 Morgan Lake Alternative will affect more sensitive habitats and animal species than the  
15 Glass Hill Alternative.<sup>12</sup>

16 **Q. Where is Twin Lake?**

17 A. Twin Lake and its surrounding wetlands are located within Morgan Lake Park.

18 **Q. Does the Morgan Lake Alternative impact Twin Lake?**

19 A. No. No Project component is located within Morgan Lake Park, and as a result no  
20 component of the Morgan Lake Alternative will directly impact Twin Lake.

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<sup>7</sup> Susan Geer's Amended Opening Testimony and Exhibits of Susan Geer (Susan Geer/100, Geer/1) (Feb. 1, 2023).

<sup>8</sup> Susan Geer/120, (McAllister Letter and Attachments to Todd Cornett) (Feb. 1, 2023); Susan Geer/123, McAllister/1 (Expert Witness Testimony of Michael McAllister in Support of Intervenor Susan Geer) (Feb. 1, 2023).

<sup>9</sup> Susan Geer/100, Geer/8 (Feb. 1, 2023).

<sup>10</sup> Susan Geer/100, Geer/9 (Feb. 1, 2023).

<sup>11</sup> Susan Geer/100, Geer/2 (Feb. 1, 2023).

<sup>12</sup> Susan Geer/100, Geer/8 (Feb. 1, 2023).

1 **Q. Ms. Geer also mentions nesting habitat established near Twin Lake that supports**  
2 **bald eagles. Has Idaho Power considered potential impacts to bald eagle habitat?**

3 A. My understanding is that the Company's site certificate will require avoidance of that  
4 habitat. The site certificate for the Project requires the Company to comply with specific  
5 temporal and spatial restrictions during construction which will ensure that construction of  
6 the Project does not disturb nesting bald eagles.<sup>13</sup>

7 **Q. Ms. Geer also raises concerns regarding Dr. Rice's property. Where is that located?**

8 A. My understanding is that it is located in Union County, and would be crossed by the  
9 Morgan Lake Alternative.

10 **Q. Where is the Winn Meadow located?**

11 A. Winn Meadow is located on Dr. Rice's property in Union County.

12 **Q. Has Idaho Power surveyed Winn Meadow?**

13 A. Idaho Power surveyed the Project route, which passes near Winn Meadow. Because  
14 Winn Meadow is not within the site boundary for the Project, Idaho Power has not  
15 surveyed Winn Meadow.

16 **Q. Ms. Geer asserts that Winn Meadow is a "wet meadow."<sup>14</sup> Is that accurate?**

17 A. While Idaho Power did not survey Winn Meadow, an NWI-mapped wetland feature is  
18 located within Winn Meadow.

19 **Q. Will the Project impact the NWI-mapped wetland feature?**

20 A. No. No Project component is located within the NWI-mapped wetland feature at Winn  
21 Meadow. Tetra Tech visited the work structure area located southeast of Winn Meadow  
22 and did not observe a wetland in the area in which Project disturbance is proposed. The  
23 site boundary at the existing road (set to be improved) that will be used for Project access  
24 intersects Sheep Creek, which was field delineated as an intermittent stream during the

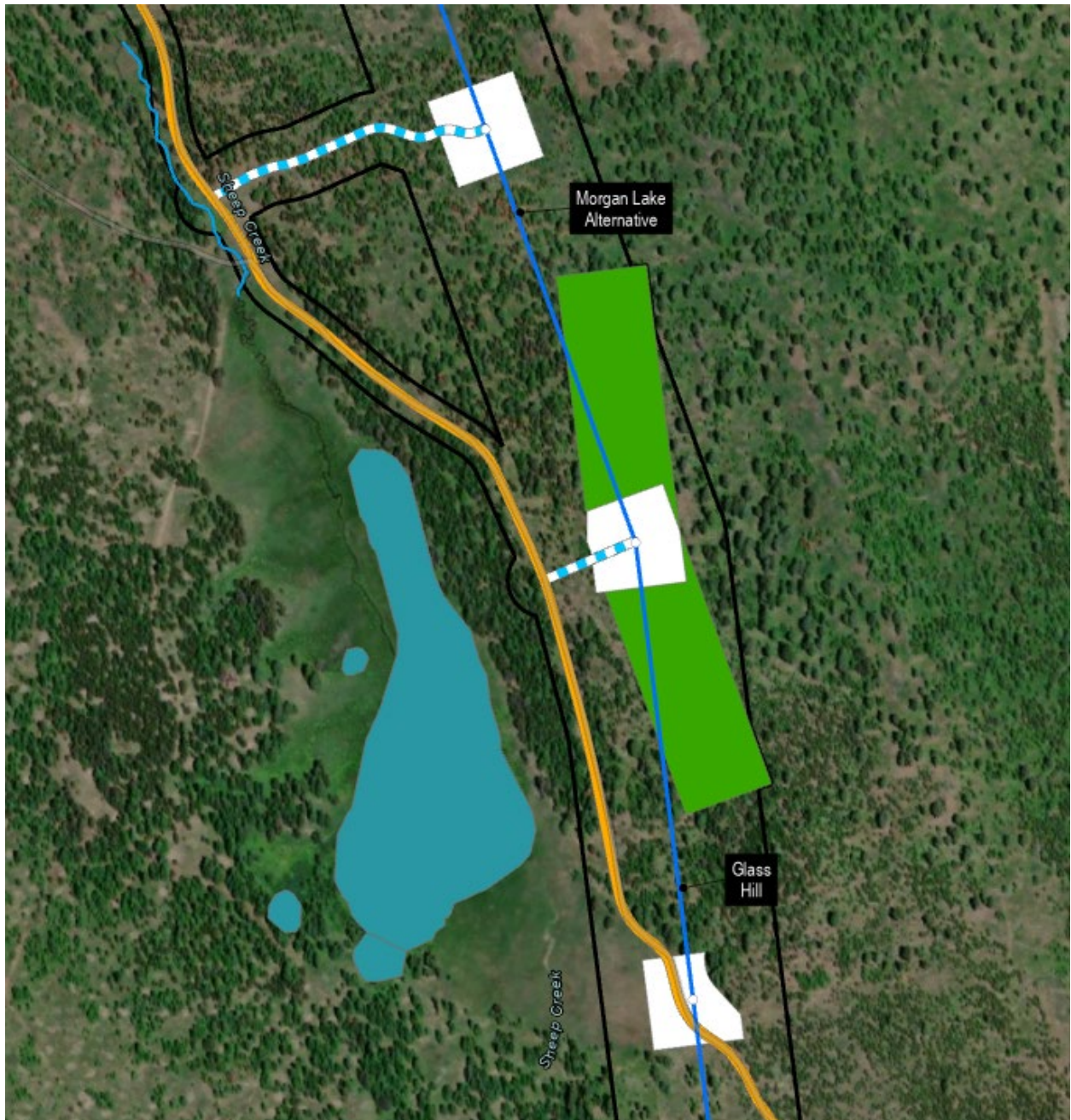
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<sup>13</sup> Final Order, Attachment 1 at 810 of 10603.

<sup>14</sup> Susan Geer/100, Geer/9 (Feb. 1, 2023).

2022 field season. A figure showing the location of the Project relative to the NWI-mapped wetland feature is provided below in Figure 2.

**Figure 2. Project Features in Proximity to Winn Meadow/NWI Delineated Wetland**



**Q. Ms. Geer raises a concern about rare species located at Dr. Rice's property. Has Idaho Power surveyed his property?**

1 A. Idaho Power has not surveyed the entirety of Dr. Rice's property—instead the Company's  
2 survey is limited to the site boundary proposed for construction of the Project. The  
3 Company surveyed the segment of the Project (referred to at EFSC as the Morgan Lake  
4 Alternative) that crosses Dr. Rice's property in 2022 for noxious weeds and ODA T&E or  
5 federally listed plant species. The results of those surveys are attached to my testimony  
6 as Exhibit Idaho Power/1402.

7 **Q. What species did Idaho Power identify in those surveys?**

8 A. In the 2022 surveys, Idaho Power identified four species of weeds within the Project  
9 segment that cross Dr. Rice's property: *Cirsium arvense* (Canada thistle), *Cirsium vulgare*  
10 (Bull thistle), *Cynoglossum officinale* (houndstongue), and *Hypericum perforatum* (St.  
11 John's wort). The Company also identified populations of *Ventenata dubia* (wiregrass)  
12 near Dr. Rice's property.

13 **Q. Did the Company identify any rare plant species in those surveys?**

14 A. It is not entirely clear what Ms. Geer refers to as "rare" plant species, as that is not a  
15 defined term in the regulatory processes for which Idaho Power surveyed the Project  
16 route. However, Idaho Power surveyed for ODA T&E species and federally listed plant  
17 species, and did not identify any listed species within the site boundary on Dr. Rice's  
18 property during the 2022 surveys.

19 **Q. Ms. Geer testifies that the Morgan Lake Alternative will affect more sensitive**  
20 **habitats and native species than the Glass Hill Alternative.<sup>15</sup> Did Idaho Power**  
21 **survey the habitat located along the Glass Hill Alternative?**

22 A. Idaho Power completed a desktop review of the Glass Hill Alternative. However, because  
23 the Company has not proposed the Glass Hill Alternative in the EFSC or CPCN processes,  
24 Idaho Power did not conduct TVES of that alternative.

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<sup>15</sup> Susan Geer/100, Geer/8 (Feb. 1, 2023).

1 **Q. Does the Company have surveys of the Morgan Lake Alternative?**

2 A. Yes, Idaho Power conducted both desktop review and field surveys of the Morgan Lake  
3 Alternative.

4 **Q. Is it possible to compare the surveys the Company conducted of the Morgan Lake  
5 and Glass Hill Alternatives?**

6 A. Yes, but at a desktop-level only. The Company does not have field survey data for the  
7 Glass Hill Alternative. For an accurate comparison, I have compared the desktop surveys  
8 of the Morgan Lake Alternative to the desktop review of the Glass Hill Alternative.

9 **Q. Is Ms. Geer correct that the Morgan Lake Alternative affects more sensitive habitat  
10 and wildlife species than the Glass Hill Alternative?**

11 A. Both routes are sited near wildlife habitat but the extent of habitat based on desktop review  
12 near each route is comparable. Additionally, my understanding is that Idaho Power will  
13 be required to mitigate impacts to habitat resulting from the Morgan Lake Alternative, as  
14 they would for any alternative, consistent with EFSC's Fish and Wildlife Habitat  
15 Standard.<sup>16</sup>

16 Based on the desktop review, both routes have similar occurrences of endangered  
17 or threatened fish species. The Morgan Lake Alternative affects more forested acres, but  
18 the Glass Hill Alternative impacts more NHD and NWI resources. This comparative  
19 analysis of the habitat present along the two routes is summarized below in Table 1.

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<sup>16</sup> OAR 345-022-0060; Final Order, Attachment 1 at 778-79 of 10603 (detailing requirements for the final Fish and Wildlife Habitat Mitigation Plan).

1 **Table 1. Habitat Present Along Route Segments in Union County**

	EFSC Proposed Route (Mill Creek Alternative)	Morgan Lake Alternative	NEPA Preferred Alternative (Glass Hill Alternative -S2-D2)
<i>Site Boundary Acreage</i>	1,159	1,124	1,111
<i>SSPS Occurrences</i>	Oregon semaphore grass (1)	No	No
<i>ESA Fish Occurrences</i>	Bull trout (1); Chinook (1); Steelhead (4)	Bull trout (1); Chinook (1); Steelhead (5)	Bull trout (1); Chinook (1); Steelhead (5)
<i>Forested Acreage</i>	401	656	592
<i>NHD Features</i>	21	24	27
<i>NWI Features</i>	28	24	27
<i>Elk Winter Range Acreage</i>	1,159	1,007	999
<i>Deer Winter Range Acreage</i>	1,159	930	827

2 **III. MR. MCALLISTER'S ANALYSIS OF THE ROUTES**

3 **Q. You said above that Ms. Geer filed a letter from her witness, Mr. McAllister,**  
4 **comparing the impacts resulting from the Morgan Lake Alternative with those**  
5 **resulting from the Glass Hill Alternative.<sup>17</sup> Are you familiar with this letter?**

6 **A.** Yes, I have read and am familiar with Mr. McAllister's analysis.

7 **Q. Prior to preparing this testimony, had Idaho Power completed a comparable**  
8 **analysis of the Morgan Lake Alternative and the Glass Hill Alternative?**

9 **A.** No—it is my understanding that no applicable standard requires the Company to do so.  
10 Idaho Power conducted most of its more detailed, survey-driven analysis for the EFSC  
11 proceedings and did not include a comparative analysis regarding routes not proposed by  
12 the applicant. For that reason, the Company did not complete a comparative analysis of  
13 these two routes during the EFSC process. However, as discussed above, I have  
14 completed a desktop review of the publicly available sensitive resource data present along  
15 both routes in preparation for this Reply Testimony.

16 **Q. Are you familiar with how Mr. McAllister prepared his analysis?**

17 **A.** No, I am not. However, based on the general nature of his comments, Mr. McAllister's  
18 analysis appears to be a desktop analysis based on publicly available information, except  
19 for personal observations about resources along the Morgan Lake Alternative.

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<sup>17</sup> Susan Geer/120, Geer/2 (Feb. 1, 2023).

1 **Q. What impacts does Mr. McAllister identify from the Morgan Lake Alternative that he**  
2 **asserts are more substantial than impacts from the Glass Hill Alternative?**

3 A. Mr. McAllister identifies the fact that, while both routes cross Rock Creek, the Morgan Lake  
4 Alternative does so only 3 miles upstream from the confluence with the Grande Ronde  
5 River while the crossing for the Glass Hill Alternative is 8.5 miles upstream.<sup>18</sup>  
6 Mr. McAllister asserts that this difference is significant because the lower six miles of Rock  
7 Creek are deemed important habitat to Snake River Chinook salmon. Next, Mr. McAllister  
8 discusses Twin Lake, which he alleges “supports one of the most diverse waterfowl  
9 nesting communities in the Blue Mountain Ecoregion.”<sup>19</sup> Mr. McAllister also discusses  
10 bald eagle nesting near Twin Lake.<sup>20</sup> Finally, Mr. McAllister discusses elk habitat on Glass  
11 Hill, which he asserts will be impacted by the Morgan Lake Alternative.<sup>21</sup>

12 **Q. Is Mr. McAllister correct in stating that the Morgan Lake Alternative crossing over**  
13 **Rock Creek is closer to the confluence with the Grande Ronde River?**

14 A. Yes, Mr. McAllister’s comparison of the two crossing locations is correct.

15 **Q. Why does Mr. McAllister assert that this crossing information results in habitat**  
16 **impacts?**

17 A. Mr. McAllister is concerned because the lower stretches of Rock Creek provide habitat for  
18 Snake River Chinook salmon, which is an endangered species.

19 **Q. Has Mr. McAllister provided any basis to conclude that this crossing will impact**  
20 **Snake River Chinook salmon?**

21 A. No, the mere fact that a transmission line crosses over a stream does not mean that the  
22 habitat located within that stream will be impacted. For example, my understanding is that  
23 ODFW’s Fish Passage Rules will not require Idaho Power to develop a fish passage plan

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<sup>18</sup> Susan Geer/120, McAllister/11 (Feb. 1, 2023).

<sup>19</sup> Susan Geer/120, McAllister/13 (Feb. 1, 2023).

<sup>20</sup> Susan Geer/120, McAllister/13-14 (Feb. 1, 2023).

<sup>21</sup> Susan Geer/120, McAllister/14 (Feb. 1, 2023).



1 for the crossing over Rock Creek, because the transmission line will not place any  
2 obstruction within the creek.<sup>22</sup> Additionally, to the extent that there may be impacts to  
3 riparian habitat associated with any portion of the route, the Habitat Mitigation Plan  
4 included as Attachment P1-6 to EFSC's Final Order contemplates mitigation for such  
5 impacts.<sup>23</sup>

6 **Q. Does Mr. McAllister raise concerns regarding other endangered species?**

7 A. No, Snake River Chinook salmon is the only endangered species that Mr. McAllister  
8 mentions in his comments.

9 **Q. Does Mr. McAllister discuss the endangered species present along the Glass Hill**  
10 **Alternative?**

11 A. No, he does not.

12 **Q. Are there any threatened or endangered species near the Glass Hill Alternative?**

13 A. Yes, as listed in Table 1 above, the Glass Hill Alternative includes habitat for Bull trout and  
14 steelhead.

15 **Q. Are there also endangered species near the Morgan Lake Alternative?**

16 A. Yes. The Morgan Lake Alternative includes habitat for the same species present along  
17 the Glass Hill Alternative.

18 **Q. Has Idaho Power analyzed potential impacts to these species?**

19 A. My understanding is that EFSC's Threatened and Endangered Species Standard requires  
20 the Company to demonstrate that "the design, construction and operation of [B2H], taking  
21 into account mitigation, are not likely to cause a significant reduction in the likelihood of

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<sup>22</sup> See Idaho Power's Supplement to Petition for CPCN, Attachment 1 (Final Order, Attachment BB-2, Fish Passage Plans) at 9285 of 10603 (Oct. 7, 2022) (listing the crossings for which the Project will require a fish passage plan, none of which are located in Rock Creek).

<sup>23</sup> See *generally* Idaho Power's Supplement to Petition for CPCN, Attachment 1 (Final Order, Attachment P1-6, Fish and Wildlife Habitat Mitigation Plan) at 10076 of 10603 (Oct. 7, 2022).

1 survival or recovery of the species"<sup>24</sup> and EFSC determined that the Company  
2 demonstrated compliance with that requirement.<sup>25</sup>

3 **Q. How do you respond to Mr. McAllister's assertions regarding the habitat at Twin**  
4 **Lake?**

5 A. As I discussed above, no component of B2H is proposed within Morgan Lake Park, which  
6 includes Twin Lake. Therefore, there will be no direct impacts to Twin Lake from the  
7 Project.<sup>26</sup>

8 **Q. Does Mr. McAllister identify other species near Twin Lake?**

9 A. Yes. Mr. McAllister asserts that Twin Lake provides habitat for Ring-necked Ducks, Red  
10 Head, Rudy Duck, Blue-winged Teal, Shoveler, and Pied-billed Grebe.<sup>27</sup> Mr. McAllister  
11 further asserts that two state sensitive species, Great Gray Owl and White-headed  
12 woodpecker, frequent the habitat there.

13 **Q. Did Idaho Power survey Twin Lake for potential habitat?**

14 A. The analysis area for the Fish and Wildlife Habitat Standard at EFSC included all areas  
15 within the site boundary.<sup>28</sup> Because Twin Lake is not within the site boundary, Idaho  
16 Power did not specifically survey Twin Lake when pursuing its site certificate.

17 **Q. How do you respond to Mr. McAllister's concern regarding bald eagle nesting near**  
18 **Twin Lake?**

19 A. As I discussed above, my understanding is that EFSC's site certificate requires the  
20 Company to implement spatial and temporal construction restrictions which will minimize  
21 impacts to nesting birds during construction of the Project.<sup>29</sup>

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<sup>24</sup> OAR 345-022-0070(2).

<sup>25</sup> Final Order at 424 of 10603.

<sup>26</sup> See Final Order at 348 of 10603 (explaining that the analysis area for impacts to fish and wildlife habitat is the area within the site boundary).

<sup>27</sup> Susan Geer/120, McAllister/13.

<sup>28</sup> Final Order at 348 of 10603.

<sup>29</sup> Final Order, Attachment 1 at 810 of 10603.

1   **Q.     Is Mr. McAllister correct that the Morgan Lake Alternative will cross elk habitat?**

2   A.     Yes, as listed in Table 1 above, the Morgan Lake Alternative will cross mapped elk habitat.

3         However, the Glass Hill Alternative will also cross mapped elk habitat. Moreover, my

4         understanding is that impacts to this elk habitat were specifically analyzed in the EFSC

5         process and EFSC concluded that impacts to elk habitat, like impacts to all fish and wildlife

6         habit, were mitigated sufficiently to ensure compliance with the ODFW Fish and Wildlife

7         Habitat Mitigation Policy.<sup>30</sup>

8   **Q.     In your opinion, has Mr. McAllister demonstrated that the habitat located along the**

9         **Morgan Lake Alternative is more important compared to the Glass Hill Alternative?**

10  A.     No, he has not. Although Mr. McAllister is correct that important habitat is present along

11         the Morgan Lake Alternative, the publicly available sensitive resource data reviewed and

12         summarized below show comparable resources present along the Glass Hill Alternative.

13  **Q.     Does this conclude your testimony?**

14  A.     Yes.

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<sup>30</sup> Final Order at 371, 407 of 10603.

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

Docket PCN 5

In the Matter of

IDAHO POWER COMPANY'S  
PETITION FOR CERTIFICATE OF PUBLIC CONVENIENCE  
AND NECESSITY

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Curriculum Vitae of Michael Ottenlips

February 21, 2023



## Michael Ottenlips

### Botanist/Ecologist & GIS Specialist

#### EXPERIENCE SUMMARY

Mr. Ottenlips primarily has a background in botanical sciences and vegetation surveys. He received a MS degree in 2019 from Boise State University where his research focused on rare plant taxonomy, evolution, and distributions. As part of his graduate studies and previous position with the Forest Service, Mr. Ottenlips performed advanced GIS analysis and data management. He is particularly familiar with Collector for ArcGIS, field data collection strategies, and associated database management. Outside of botany and GIS, Mr. Ottenlips has a broad background in biology and natural resources including capturing large mammals, surveying for invertebrates, installing large restoration experiments, and experience with basic stream morphology. Finally, Mr. Ottenlips has strong skills in scientific and technical writing including peer-reviewed journal articles, technical reports, code documentation, fieldwork protocols, environmental impact statements (EIS), and biological assessments (BA).

#### RELEVANT EXPERIENCE

**Idaho Power, Boardman to Hemingway Transmission Line Project, Southeast Oregon and Southwest Idaho.** As a botanist and task lead, Mr. Ottenlips supervised the preconstruction field survey of noxious weeds and special status plant species along the length of the proposed transmission line. Mr. Ottenlips also prepared the Project's Noxious Weed Management Plans for the BLM's Plan of Development and EFSC process and assisted in the preparation of the Reclamation and Revegetation Plans including mapping habitat data within the site boundary (2022-Present). As a field botanist, Mr. Ottenlips supervised and participated a three-week noxious weed survey and prepared a report documenting findings to the BLM Vale District Office and Owyhee Field Office (2021). Mr. Ottenlips has also performed Terrestrial Visual Encounter Surveys (TVES) surveys within the Blue Mountains portion of the Project (2021).

**Perpetua Resources, Stibnite Gold Project, Idaho.** Mr. Ottenlips wrote a portion of a BA analyzing the effects of a proposed mine on whitebark pine, a candidate species for federal listing (2021-2022). As a botanist and GIS specialist, Mr. Ottenlips developed upland planting prescriptions to be used in the mine reclamation and closure plan (2020-2021). As a field biologist, Mr. Ottenlips conducted stream mapping and data collection in the field and data quality control in the office (2018).

**Air Force Global Strike Command, Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal** As a biologist, Mr. Ottenlips wrote various technical memos, portions of a BA and EIS, performed special status species surveys, and wetland delineations (2020-2022).

**Northwest Williams Pipeline LLC, Elmore County, Idaho.** As a botanist, Mr. Ottenlips helped perform slickspot peppergrass (LEPA) surveys, a species protected under the ESA (2021).

#### EDUCATION

MS, Biology, Boise State University, 2019

BA, Biology, Hendrix College, 2014

#### AREA OF EXPERTISE

Botany and other Biological Surveys, Rare Plant Surveys, Invasive Plant and Noxious Weed Inventory and Mapping, NEPA and ESA document production; Noxious Weed Management Plans

#### REGISTRATIONS/ AFFILIATIONS

Idaho Native Plant Society; Southern Idaho Rare Plant Working Group

#### TRAINING/CERTIFICATIONS

Safety: Wilderness First Aid/CPR (2019); OSHA 10-hour (2018); Avalanche Level 1 (2018)

GIS Coursework/Trainings: Advanced Analysis (2019); AGOL/Collector (2019); Fundamentals (2014)

Botany/Ecology Coursework: Plant Ecology (2018), Soil Science (2018), Plant Systematics (2013), Botany (2012)

#### OFFICE

Boise, Idaho

#### YEARS OF EXPERIENCE

7

#### YEARS WITHIN FIRM

3

**International CuMo Mining Corporation, and USFS, CuMo Exploration Project Sensitive Plant Species Clearance Surveys, Idaho** As a botanist, Mr. Ottenlips surveyed for special status plant species, performed repeat photography monitoring and drafted a report documenting the findings of a field excursion (2021).

**Assessment, Inventory, and Monitoring (AIM), BLM, Ely, Nevada** As a supervisor/manager, Mr. Ottenlips hired and monitored the performance of up to nine employees (2021-2022). As a botanist, Mr. Ottenlips monitored bristlecone pine stands, pinyon-juniper woodlands, and sagebrush steppe habitats prior to management actions by the BLM. (2020).

**Confidential Wind Energy Facility. Umatilla County, OR.** As the GIS lead, Mr. Ottenlips created figures, performed spatial analysis, and managed all GIS-related tasks for a repower at a wind energy facility in northeastern Oregon. As a botanist, Mr. Ottenlips led a small crew performing rare plant surveys on site (2021).

**Owyhee Pump Storage LLC, Malheur County, OR.** As a botanist, Mr. Ottenlips independently performed a rare plant survey at a 160-acre proposed reservoir site and prepared a report documenting the findings (2021).

**Baseline Studies and Environmental Support for the DeLamar Mine, Integra Resources, Owyhee County, ID.** As a GIS specialist, Mr. Ottenlips developed a Survey123 application to record stream flows and in-situ measurements. As a field technician, Mr. Ottenlips performed surface and ground water sampling, and other duties as part of baseline studies prior to a proposed action at a mine site. (2020-2021).

**Avangrid Renewables, Rare Plant Surveys, Bluebird Solar, Prosser, Washington** As a field botanist, Mr. Ottenlips surveyed and mapped populations of noxious weeds, rare plants, and general habitat types on a proposed solar facility (2020).

**Capital Power, Washington Ground Squirrel Surveys, Nolin Hills, Pendleton, Oregon.** As a biologist, Mr. Ottenlips surveyed and mapped noxious weeds, Washington Ground Squirrels, and other species of concern populations on a proposed wind facility (2020).

**Bureau of Land Management (BLM), Bruneau-Owyhee Sage-grouse Habitat Project (BOSH) Plant Surveys, ID.** As a field botany technician, Mr. Ottenlips conducted sensitive plant and noxious weed surveys on 10,600 acres of BLM land during May-June 2018. Surveys were conducted according to BLM protocols and data collected using ArcGIS Collector on MESA 2 Tablets. Habitat accounts were recorded to document general habitat conditions. When a sensitive plant species, potential habitat, or noxious weed was located, a GPS position was taken within the GPS data form. Photographs were taken and georeferenced with the GPS point and data. A technical report was drafted and finalized within the contract period (2018).

## PREVIOUS EXPERIENCE

**Great Basin Native Plant Project Seed Collections, U.S. Forest Service, Boise, ID.** As the field team leader, Mr. Ottenlips led multiple crews of two-three people collecting native plant seed across the Great Basin. Duties included training technicians, planning the field season, and developing field data collection protocols. As part of this project, Mr. Ottenlips deployed Collector for ArcGIS in the field and streamlined data QA processes using ArcGIS Online (2019-2020).

**Common Garden and Restoration Installations, U.S. Forest Service, Boise, ID.** As the field team leader, Mr. Ottenlips managed a crew up to 10 technicians, volunteers, and interns to install up 2,500 outplants at six restoration-orientated job sites throughout the Intermountain West. His duties included operating and maintaining hand-held gas-powered machinery, heavy duty trucks and flatbed trailers, and water tanks/pumps (2019).

**Pacfish/Infish Biological Opinion (PIBO), U.S. Forest Service, St. Regis, MT.** As a crew leader, Mr. Ottenlips led a 3-person crew that worked throughout the inland Northwest (ID/OR/MT) conducting vegetation surveys and stream morphology sampling. The crew worked 8 days at a time in a variety of front and backcountry settings including extended backpacks into remote wilderness areas. The project was part of the larger Pacfish/Infish Biological Opinion (PIBO). Sampling was via a modified Daubenmire protocol and included forest, grassland, and sagebrush ecosystems throughout the Northern Rocky Mountains of Idaho and Montana. Data were input into an electronic field data collection device, the Archer field computer (2017).

**Pacfish/Infish Biological Opinion (PIBO), U.S. Forest Service, Ukiah, OR.** As a technician, Mr. Ottenlips identified riparian vegetation to species level, determined greenline and other stream morphology characteristics following established protocols. Additional duties included repeat photography, and navigation to field sites using GPS with 4x4 vehicles and on-foot. The project was part of the larger Pacfish/Infish Biological Opinion (PIBO) which monitors habitat quality of the rare/endangered Bull Trout and Steelhead Salmon. Sampling locations included forest, grassland, and sagebrush ecosystems throughout the Great Basin in Idaho and Oregon (2016).

## PROFESSIONAL EMPLOYMENT HISTORY

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Biologist and GIS Specialist, Tetra Tech, 2020-Present  
Biological Science Technician/Field Team Leader (GS-7), United States Forest Service, 2019-2020  
Graduate Teaching Assistant, Boise State University, 2016-2019  
Botanical Field Technician, Tetra Tech, 2018  
Crew Leader (GS-5), United States Forest Service, 2017  
Biological Science Technician (GS-5), United States Forest Service, 2016  
Entry Level Biologist, Monsanto (Bayer), 2015 - 2016  
Elk Research Technician, Missouri Department of Conservation, 2015  
Ash Tree Survey Intern, Student Conservation Association, 2014  
Botany Crew Technician, Missouri Department of Conservation, 2014  
Electrofishing Intern, University of Central Arkansas, 2013

## ACADAEMIC (PEER-REVIWED) PUBLICATIONS

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Ottenlips, M. V., Feist, M. A. E., Mansfield, D. H., Plunkett, G. M., Buerki, S., & Smith, J. F. 2020. Evolutionary Origins of Three Rare Alpine-Endemic Species of *Lomatium* (Apiaceae) in the Willowa and Elkhorn Mountains of Northeastern Oregon. *International Journal of Plant Sciences*, 181(7), 748-765.

Ottenlips, M. V., Mansfield, D. H., Buerki, S., Feist, M. A. E., Downie, S. R., Dodsworth, S., & Smith, J. F. 2021. Resolving species boundaries in a recent radiation with the Angiosperms353 probe set: the *Lomatium packardiae*/L. *anomalum* clade of the *L. triternatum* (Apiaceae) complex. *American Journal of Botany*.

Idaho Power/1402  
Witness: Michael Ottenlips

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

Docket PCN 5

In the Matter of

IDAHO POWER COMPANY'S  
PETITION FOR CERTIFICATE OF PUBLIC CONVENIENCE  
AND NECESSITY

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Survey Results from Rice Glass Hill Parcel

February 21, 2023



