Clean Water Act Section 401 Water Quality Certification Application

Please refer to the "Clean Water Act Section 401 Water Quality Certification Application Guidance" document for assistance with completing this application.

A. Pre-Filing Meeting

Please provide the date that a pre-filing meeting was requested from Nevada Division of Environmental Protection (NDEP) Bureau of Water Quality Planning (BWQP). *Note: If a pre-filing meeting has not been requested, please schedule a pre-filing meeting with NDEP BWQP.*	A pre-filing meeting occurred 04.28.2025 with NDEP BWQP.

B. Contact Information

Project Proponent Information

Company Name: NV ENERGY		Address: 6100 NEIL ROAD, MS S4B08
Applicant Name: LEE SIMPKINS		City: RENO
Phone: 775-834-3528	Fax: N/A	State: NEVADA
Email: LEE.SIMPKINS@NVENERGY.COM		Zip Code: 89511

Agent Information

Company Name: POWER ENGINEERS, INC.		Address: 5 WEST MENDENHALL ST., SUITE 202
Agent Name: ERIK NYQUIST		City: BOZEMAN
Phone: 208-288-6581	Fax: 208-288-6199	State: MONTANA
Email: ERIK.NYQUIST@POWERENG.COM		Zip Code: 59715

C. Project General Information

Project Location

Project/Site Name: GREENLINK COMMON TIE TRANSMISSION LINE PROJECT	Name of receiving waterbody: WALKER LAKE, CARSON RIVER, TRUCKEE RIVER
Address: VARIOUS. PLEASE SEE ATTACHED DOCUMENTATION	Type of waterbody present at project location (*select all that apply*): ☒ Perennial River or Stream ☒ Intermittent River or Stream ☒ Ephemeral River or Stream ☐ Lake/Pond/Reservoir ☒ Wetland ☐ Other: _____
City: N/A	
County: WASHOE, STOREY, LYON	
State: NEVADA	
Zip Code: VARIOUS	
Latitude (UTM or Dec/Deg): 39.455564 (NORTHWEST END) 39.494514 (NORTHEAST END) 39.132533 (SOUTHERN END)	Longitude (UTM or Dec/Deg): -119.717551 (NORTHWEST END) -119.438814 (NORTHEAST END) -119.154788 (SOUTHERN END)

Township: VARIES	Range: VARIES	Section: VARIES	¼ Section: VARIES

Project Details	
Project purpose:	The purpose of the proposed Project is to increase available transfer capability, including, but not limited to, areas of potential renewable energy generation; to assist load-serving utilities in meeting the requirements to address energy delivery obligations and meet state renewable portfolio standards; and to alleviate transmission congestion in Nevada, ensuring continued delivery of reliable electric power serviced to the region. Based on the area's current load growth and associated infrastructure projects, it is anticipated that the power demand will be stressed without the construction of the proposed Project.
Describe current site conditions: Attachments can include, but are not limited to, relevant site data, photographs that represent current site conditions, or other relevant documentation.	The site conditions vary throughout the Project transmission line corridor. The Project Area is situated within the Central Basin and Range Level III ecoregion and consists of a mix of desert basins with long, frequently broken mountain ranges. The Project area supports desert shrub vegetation. The lowest elevations support salt-desert shrub communities and associated vegetation. With increased elevation and reduced soil salinity, black sagebrush becomes dominant on sedimentary parent material. Mountain big sagebrush and low sagebrush occur on mountain backslopes in association with or higher on the slope than mixtures of Utah juniper and single leaf pinyon or curl-leaf mountain mahogany. Eleven (11) likely jurisdictional aquatic resources were identified within the Project Area, six waterways, and five wetlands. The six waterways include two crossings (east and west) of the Carson River; two man-made irrigation canals (perennial), one which returns surface water to the Walker River and one which returns surface water to the Carson River; one intermittent stream (Long Valley Creek) that feeds into the Truckee River; and one intermittent stream (Churchill Canyon) that flows into the Carson River. The five wetland areas identified and surveyed accounted for 8.16 acres of palustrine wetland habitat (7.73 acres of emergent wetland, 0.01 acre of scrub-shrub wetland, and 0.42 acre of forested wetland) within the southern extent of the Project Area. Ephemeral streams throughout the Project Area typically terminate in dry playa lakes. Further descriptions of aquatic resources can be found in the Greenlink_CT_PCN attached to this application. The Project area is predominantly located on federal and state administered lands. Livestock production on rangeland is the principal agricultural enterprise. A small percentage of the area is used for irrigated cropland.

Describe the proposed activity including methodology of each project element:	NV Energy is proposing to construct approximately 131 miles of new 345 kV transmission line extending from the Walker River Substation (WRS), located approximately 10 miles north of Yerington, Nevada to existing Mira Loma and Comstock Meadows 345 kV Substations located approximately 12 miles northwest of Silver Springs and seven miles southeast of Reno, Nevada respectively. Transmission line methodology: 1. Centerline and access roads are surveyed and staked. 2. Flag areas designated as no entry. 3. Install erosion and sediment control measures. 4. Access roads are constructed. 5. Work areas are cleared. 6. Install additional erosion and sediment controls as needed, such as topsoil pile protection. 7. Construction yards are established, and materials distributed along the centerline. 8. Foundation installation, structure assembly, and structure installation. 9. Conductors and ground wires are strung and tensioned. 10. Site demobilization and cleanup. 11. Work areas and temporary access areas are cleaned up and restored. Based on on-site conditions, Individual crossings may require additional methodologies to be implemented. Included in this attachment is the Greenlink_West_CT_Concrete Washout Plan. Project visuals include figures (see attached Greenlink_CT_PCN) and shapefiles (see attached Greenlink_CT_Project_Shapefiles).
Estimate the nature, specific location, and number of discharge(s) expected to be authorized by the proposed activity:	A total of 69 aquatic features were confirmed by POWER biologists along the 345 kV transmission line right-of-way (ROW) during the field investigation of the Project area (see attached Greenlink_CT_Project_Shapefiles). Of these, 58 were identified as ephemeral waterways and considered non-jurisdictional based on current waters of the United States (WOTUS) definition. Of the 11 aquatic features identified as preliminarily jurisdictional (subject to United States Army Corps of Engineers [USACE] confirmation) within the Project area, temporary impacts are anticipated to occur at only two of these features (WL-5 and WL-1). Temporary impacts associated with WL-5 consist of a conversion of 0.42 acres of Palustrine Forested wetland (PFO) to Palustrine Scrub-Shrub wetland (PSS) due to tree clearance issues. Following USACE correspondence, no mitigation for the wetland conversion is required (see attached Greenlink_CT_PCN). Temporary impacts associated with WL-1 (palustrine emergent

	wetland) is comprised of 0.17-acre of proposed temporary impacts, consisting of the placement of vegetation mats across three designated crossings that will be used to isolate equipment travel and protect soil structure and vegetation root systems. Additionally, these areas will be stabilized using best management practices as outlined in the Project's stormwater pollution prevention plan and reclamation plan that was included in the Project Construction, Operation, and Maintenance Plan (see attached Greenlink_West_CT_TLine_SWPPP). These areas will not require mitigation due to the temporary nature of these impacts. There will be no direct crossing of water features during times of flow. In addition, any ground disturbance within the Project Area will be returned to pre-construction contours, to the greatest extent practicable, immediately following completion of construction activities. Timber mat options and specifications being considered can be found in Greenlink_CT_Timber_Mat_Options file attached to this application.	
Provide the date(s) on which the proposed activity is planned to begin and end and the approximate date(s) when any discharge(s) may commence:	Construction is proposed to initiate during the fall of 2025 and be completed by the winter of 2026	
Provide a list of the federal permit(s) or license(s) required to conduct the activity which may result in a discharge into regulated waters (see mandatory attachments):	NWP 57 (SPK-2025-00138).	
Provide a list of all other federal, state, interstate, tribal, territorial, or local agency authorizations required for the proposed activity and the current status of each authorization:	Please see Attachment (below).	
Total area of impact to regulated waterbodies (acres):	Temporary impacts include 0.42 acre (WL-5) of palustrine, forested wetland converted to palustrine, scrub-shrub wetland with direct surface connection to the Carson River (section 10 WOTUS) and 0.17 acre (WL-1) of vegetation mats placed in palustrine, emergent wetland that also has a direct surface connection to the Carson River (section 10 WOTUS).	
Total distance of impact to regulated waterbodies (linear feet):	N/A	
Amount excavation and/or fill discharged within regulated waters (acres, linear feet, and cubic yards):	Temporary:	Permanent:
	0.17 acres	0
Amount of dredge material discharged within regulated	Temporary:	Permanent:

waters (acres, linear feet, and cubic yards):	0	0
Describe the reason(s) why avoidance of temporary fill in regulated waters is not practicable (if applicable):	N/A	
Describe the Best Management Practices (BMPs) to be implemented to avoid and/or minimize impacts to regulated waters: Examples include sediment and erosion control measures, habitat preservation, flow diversions, dewatering, hazardous materials management, water quality monitoring, equipment or plans to treat, control, or manage discharges, etc.	Erosion control devices will be installed throughout the Project Area as established in the SWPPP (Greenlink_West_CT_TLine_SWPPP). Additionally, there will be no direct crossing of water features during times of flow. Best Management Practices will be implemented throughout all phases of construction. Impacts will be minimized to the greatest extent practicable.	
Describe how the activity has been designed to avoid and/or minimize adverse effects, both temporary and permanent, to regulated waters:	A total of 69 aquatic features were confirmed by POWER biologists during the field investigation of the Project Area. Of these, 58 were identified as ephemeral waterways and considered non-jurisdictional based on current WOTUS regulations. The Project's engineering design has been micro-sited to avoid impacts to water resources to the greatest extent practicable by spanning wetlands with transmission/distribution line structures and re-routing access roads and structure locations. No fill will be placed, and no excavation will occur within the OHWM. Not including impacts previously stated for WL-1 and WL-5, any impacts to ephemeral waterways will solely consist of laying back banks to accommodate overland travel. Following project completion, banks will be returned to pre-construction contours. As previously stated, of the 69 aquatic features identified as preliminarily jurisdictional (subject to USACE confirmation) within the Project Area, temporary impacts within the OHWM are anticipated to occur at two of these features.	
Describe any compensatory mitigation planned for this project (if applicable):	N/A	

D. Signature		
Name and Title (Print): Aaron Hoefer	Phone Number: 303-276-8697	Date: May 19, 2025

X 
Signature of Responsible Official

Mandatory Attachments:

- Federal Permit or License Identification:
  - Project proponents seeking a federal general permit or license must include a copy of the draft federal license or permit and any readily available water quality-related materials that informed the development of the draft federal license or permit, or;
  - Project proponents seeking a federal individual permit or license must include a copy of the federal permit or license application and any readily available water quality-related materials that informed the development of the federal license or permit application.
- Site Map - A map or diagram of the proposed project site including project boundaries in relation to regulated waters, local streets, roads, and highways.
- Engineered Drawings - Engineered drawings are preferred to be submitted at the 70% design level. If only conceptual designs are available at the time of application, plans for construction should be submitted prior to the start of the project. Specific locations of the proposed activities and details of specific work elements planned for the project should be identified (e.g., staging areas, concrete washouts, perimeter controls, water diversions, or other BMPs).

Submit the completed application materials to NDEP (ndep401@ndep.nv.gov) with the appropriate U.S. Army Corps of Engineers Regulatory Office copied on the communication (http://www.spk.usace.army.mil/Missions/Regulatory/Contacts/Contact-Your-Local-Office/).

Attachment

List of all other federal, state, interstate, tribal, territorial, or local agency authorizations required for the proposed activity and the current status of each authorization:

- USACE
  - PCN for a NWP57 was submitted to the Sacramento District on 3.08.2025.
  - Permit has not yet been received.
  - Copy of Greenlink Common Tie PCN has been included with this application
- BLM
  - Final Environmental Impact Statement: issued on 6.14.2024
  - Record of Decision: issued 09.09.2024
- SWPPP
  - Submitted to NDEP Bureau of Water Pollution Control (BWPC): 5.17.2024
  - Received NDEP BWPC Approval: 5.24.2024
- Working in Waterways Temporary Permit
  - Not yet submitted to NDEP.

March 3, 2025

NV ENERGY

Greenlink Common Tie Transmission Line Project

Pre-Construction Notification
USACE Sacramento District (SPK-2025-00138)

PROJECT NUMBER:
0169994.002.007.094

PROJECT CONTACT:
Aaron Hoefer
EMAIL:
aaron.hoefer@powereng.com
PHONE:
210-951-0761

POWER ENGINEERS
MEMBER OF WSP

1.0 APPLICANT CONTACT INFORMATION

Name: NV Energy
Contact: Lee Simpkins, Environmental Manager
Address: 6100 Neil Road
Reno, Nevada 89511
Telephone: Office: 775-834-3528
Email: lee.simpkins@nvenergy.com

2.0 PROJECT INFORMATION

The proposed Greenlink Common Tie Transmission Line Project (Project) includes the construction of three new 345 kilovolt (kV) transmission lines, telecom facilities, distribution lines, and fiber laterals (Project Area). All activities are associated with electric utility lines and telecommunication activities and can be permitted under Nationwide Permit (NWP) 57 – Electrical Utility Line and Telecommunications Activities. No other NWPs, regional general permits, or individual permits are anticipated to be applicable for this Project. The Pre-Construction Notification (PCN) form ENG 6082 has been included as Appendix A with this PCN report.

2.1 Project Location and Description

As previously stated, NV Energy is proposing to construct three new 345 kV transmission lines extending from the Walker River Substation located approximately 10 miles north of Yerington, Nevada to the existing Comstock Meadows and Mira Loma substations located approximately 12 miles northwest of Silver Springs and seven miles southeast of Reno, Nevada, respectively (Figure 1). The three lines result in approximately 131 miles of new transmission line. The Project occurs entirely within the state of Nevada within the United States Army Corps of Engineers (USACE) Sacramento District and is located within the Central Basin and Range Level III Ecoregion (United States Environmental Protection Agency [USEPA] 2012).

The Project occurs in Washoe, Storey, and Lyon counties, Nevada. The route crosses federal land (Bureau of Land Management [BLM]), Nevada state lands, properties managed by local governments, and private lands. The terminal points of the Project are:

Mira Loma Substation (NW Terminus): 39.455644° N, -119.717509° W
Comstock Meadows Substation (NE Terminus): 39.495112° N, -119.438026° W
Walker River Substation (SW Terminus): 39.131283° N, -119.148633° W

The Project includes approximately 637 transmission structures within the proposed 160-foot-wide permanent right-of-way (ROW). Some areas will likely require additional ROW to accommodate wire blowout, microwave radio facilities, optical amplifier sites, fiber optic laterals, and associated access roads. For the purposes of this PCN, the Project Area includes the Project centerline, the associated 160-foot ROW, anticipated access roads (14- to 24-foot width), pulling and tensioning sites (pull sites), material yards, and other structure-related work areas (e.g., guard structures, distribution poles) necessary for Project completion.

The transmission line structures will consist of steel pole H-frames (tubular), steel monopoles, or steel three-pole structures, as determined by existing terrain and potential environmental restrictions (e.g., protected species habitat). The structures typically range between 75 feet and 180 feet in height, with the average distance between structures being approximately 1,200 feet. Typical drawings of these structures are provided in Appendix B – Typical Drawings of Structure Types. Existing access roads will be utilized to the extent practicable, and the construction of new access roads will only occur where needed for Project construction, operation, and maintenance.

2.2 Project Purpose and Need

The purpose of the Project is to increase available transfer capability, including, but not limited to, areas of potential renewable energy generation; to assist load-serving utilities in meeting the requirements to address energy delivery obligations and meet state renewable portfolio standards; and to alleviate transmission congestion in Nevada, ensuring the continued delivery of reliable electric power service to the region. Based on the area's current load growth and associated infrastructure projects, it is anticipated that the power demand will be stressed without the construction of the Project.

2.3 Nature of Construction Activities

Below is a description of the intended sequence of major activities that will occur during construction of the transmission lines and associated infrastructure.

1. Mobilization and staging of mobile offices and construction material.
2. Pre-construction survey and staking of proposed structure locations.
3. Access road staking and construction.
4. ROW preparation, including vegetation clearing.
5. Structure foundation setup and installation.
6. Transport of structure material to respective locations and structure assembly.
7. Raising of structures and installation completion.
8. Conductor installation.
9. Site cleanup and demobilization.
10. Restoration and reclamation of all disturbed sites.

Typical construction equipment will be employed to complete clearing, grading, and foundation construction activities and will likely include bulldozers, scrapers, excavators, loaders, haul trucks, and other machinery, as necessary.

During the design phase of the Project, regular coordination with the engineering design team occurred and resulted in substantial re-design and micro-siting efforts, solely aimed at avoiding/minimizing impacts to waters of the United States (WOTUS) to the greatest extent practicable. As a result of those efforts, impacts to federally regulated aquatic resources potentially jurisdictional under the Clean Water Act (CWA) were limited to two wetland aquatic resources over the entire Project.

2.4 Existing Aquatic Resources

During June, August, and September 2024, POWER Engineers, Inc. (POWER) environmental scientists conducted environmental field investigations of the Project Area and surveyed for WOTUS as defined by 33 Code of Federal Regulations (C.F.R.) 328 and amended final "Revised Definition of WOTUS." The on-site field investigations were conducted in accordance with current methodology required by USACE within the Project Area. The *Aquatic Resource Delineation Report* (October 11, 2024) provides details of the methodologies and results of the aquatic resources survey conducted by POWER, attached to this PCN (Attachment A).

During the on-site field investigations, a total of 69 observed features within the Project Area were confirmed to be aquatic resources. Of these, 58 features were identified as ephemeral waterways and preliminarily considered non-jurisdictional based on current WOTUS regulations. Eleven likely jurisdictional aquatic resources were identified within the Project Area, six waterways, and five wetlands. The six waterways include two crossings (east and west) of the Carson River; two man-made irrigation canals (perennial), one which returns surface water to the Walker River and one which returns surface water to the Carson River; one intermittent stream (Long Valley Creek) that feeds into the Truckee River; and one intermittent stream (Churchill Canyon) that flows into the Carson River. The five wetland areas identified and surveyed accounted for 8.16 acres of palustrine wetland habitat (7.73 acres of emergent wetland, 0.01 acre of scrub-shrub wetland, and 0.42 acre of forested wetland) within the southern extent of the Project Area. The location of these resources within the Project Area is depicted in Attachment A.

2.5 Proposed Aquatic Impacts

The Project's engineering design was micro-sited to avoid impacts to aquatic resources to the greatest extent practicable. Of the 11 field-verified aquatic resources considered as likely jurisdictional and federally regulated under the CWA (subject to USACE confirmation) within the Project Area, temporary impacts, other than temporary impacts from spanning transmission lines, are anticipated to occur to two wetland features (Table 1 – Proposed Aquatic Resource Impact Summary).

TABLE 1 PROPOSED AQUATIC RESOURCE IMPACT SUMMARY

AQUATIC RESOURCE	IMPACT TYPE	IMPACT AREA (ACRES)	IMPACT LENGTH (FEET)	LATITUDE	LONGITUDE
Wetland 1 (WL-1)	Temporary	0.17	N/A	39.132658	-119.236552
Wetland 5 (WL-5)	Temporary	0.42	N/A	39.285891	-119.417400

The proposed impacts summarized in Table 1 are illustrated in Figure 2. WL-1 is comprised of palustrine, emergent wetland habitat and the 0.17 acre of proposed temporary impacts consist of the placement of vegetation mats across three designated crossings that will be used to isolate equipment travel and protect soil structure and vegetation root systems (Figure 2 – Sheet 1). Additionally, these areas will be stabilized using best management practices as outlined in the Project's Stormwater Pollution Prevention Plan (SWPPP) and Reclamation Plan

that was included in the Project Construction, Operation, and Maintenance Plan. These areas will not require mitigation due to the temporary nature of these impacts.

WL-5 is comprised of 0.42 acres of palustrine, forested wetland habitat located on the north bank of the west Carson River crossing (WW-2B) and bisects the 345 kV transmission line ROW (Figure 2 – Sheet 2). WL-5 is comprised of densely forested narrow-leaf cottonwood trees (*Populus angustifolia*). Following on-site aquatic resource delineations and observations, it was determined that completely avoiding impacts to this forested area would not be possible because of tree heights and engineering safety clearance limitations (Appendix C). Transmission line vertical clearances significantly overlap average tree heights within WL-5, which makes tree trimming not feasible and tree removal for the width of the ROW the proposed impact. Approximately 0.42 acres of tree removal are proposed within WL-5 to resolve clearance issues with transmission line wires (Figure 3 – Sheet 2). Tree removal will result in the transition of the wetland from palustrine, forested wetland habitat to palustrine, scrub-shrub wetland habitat.

Impacted aquatic resources are depicted in Figure 2, and a more detailed description of these features is provided in the aquatic delineation report attached to this PCN (Attachment A).

2.6 Proposed Mitigation Measures

No mitigation is proposed for conversion of wetland habitat from palustrine, forested to palustrine, scrub-shrub at WL-5 following correspondence with USACE (Attachment B).

To reduce wetland and waterway impacts, Best Management Practices (BMPs) will be utilized throughout construction. A SWPPP has been prepared outlining BMP protection measures to be employed to protect surface water resources and is available upon request.

3.0 COMPLIANCE WITH APPLICABLE GENERAL AND REGIONAL CONDITIONS

Based on existing information, the Project design will meet the General and Regional Conditions of NWP 57.

3.1 General Conditions

To qualify for NWP authorization, this Project will provide compliance with all general conditions identified for NWP 57 (effective date: March 15, 2021). These 29 general conditions are individually addressed below.

3.1.1 Navigation

The USACE Sacramento District considers the Carson River a navigable waterway of the United States under Section 10 of the Rivers and Harbors Act. In addition to maintaining compliance with NWP 57, the project will require a Section 10 permit. The proposed Project crosses the Carson River at three separate locations, two west crossings and an east crossing (Figure 3). The three transmission line crossings have been designed to provide sufficient clearance, complying with the applicable minimum clearances specified in 33 C.F.R. 322.5 (i),

and span the waterway feature to avoid any adverse effect on navigation (Appendix C). No direct impacts to the Carson River or its banks will result from the construction of the Project.

3.1.2 Aquatic Life Movements

Project construction activities will have no effects on aquatic life movements as no construction will occur within waterways and appropriate avoidance measures will ensure construction will not influence adjacent waterways.

3.1.3 Spawning Areas

Potential impacts to fisheries were included in the Greenlink West Final Biological Assessment (BA; BLM 2024a) and Final Environmental Impact Statement (FEIS; BLM 2024b). The FEIS did not identify any potential impacts to fisheries and the BA determined there would be no impact to Lahontan cutthroat trout. Based on these analyses, spawning areas will not be impacted within the Project Area. The Carson River will be spanned at all three crossings. Project construction activities will have no effects on spawning areas as no construction will occur within waterways and appropriate avoidance measures will ensure construction will not influence adjacent waterways.

3.1.4 Migratory Bird Breeding Areas

The potential for nest destruction and abandonment will be limited by pre-construction surveys, setting work limits, imposing nest buffers where any active nests are identified, and implementation of appropriate environmental measures that include avoiding vegetation trimming and removal during the migratory bird breeding season (February 15 through August 31) (BLM 2024e). Additionally, construction and decommissioning activities, including vegetation removal and ground disturbance, within 0.25-mile of the Carson River will occur outside the yellow-billed cuckoo (*Coccyzus americanus*) breeding season (April 1 through October 31) (BLM 2024c). The Project will comply with the Migratory Bird Treaty Act through the implementation of applicable environmental management measures, including pre-construction surveys and equipment restrictions, as necessary.

3.1.5 Shellfish Beds

This Project will have no effect on shellfish beds or shellfish harvesting activities as those areas do not exist within the Project Area.

3.1.6 Suitable Material

Suitable fill will be used if required. However, no fill is anticipated.

3.1.7 Water Supply Intakes

No public water supply intakes occur within the proximity of the Project.

3.1.8 Adverse Effects from Impoundments

The Project will not result in the creation of a water impoundment or result in restricted flow through the Project Area.

3.1.9 Management of Water Flows

There are no proposed impacts to water flows associated with the Project.

3.1.10 Fills Within 100-Year Floodplains

The Project complies with applicable Federal Emergency Management Agency-approved floodplain management requirements. As designed, no structures are located within the 100-year floodplain. Should Project facilities require floodplain development permits from applicable local and/or state of Nevada agencies, NV Energy will obtain such permits and comply with permit conditions.

3.1.11 Equipment

Equipment use within aquatic resources will be limited to operating within the authorized impact footprints within WL-1 and WL-5. No in-stream work (Carson River) will be completed within the ordinary high water mark of the river.

3.1.12 Soil Erosion and Sediment Controls

BMPs will be utilized throughout construction. A SWPPP has been prepared outlining BMP protection measures to be implemented to protect surface water resources. A copy of the SWPPP report can be made available upon request.

3.1.13 Removal of Temporary Structures and Fills

There is no proposed removal of temporary structures or fills associated with the Project.

3.1.14 Proper Maintenance

Proper maintenance measures will be employed to avoid impacts to aquatic resources.

3.1.15 Single and Complete Project

For the purposes of this report, each proposed impact to potential jurisdictional features is considered a single and complete project as defined by Note 2 within NWP 57 (March 15, 2021) and is outlined in the Single and Complete Crossings Table (Attachment C).

Each proposed impact to WL-1 and WL-5, are considered single and complete projects as defined by Note 2 within NWP 57 (March 15, 2021) and are further identified in the Single and Complete Crossings table (Attachment C).

3.1.16 Wild and Scenic Rivers

No portion of the Project occurs within a designated National Wild and Scenic River System or "study river."

3.1.17 Tribal Rights

The proposed impacts associated with construction of transmission lines, access roads and work areas are located on private land and BLM land and will not impair reserved tribal rights. Tribal coordination for the Project is being completed by the BLM as the lead federal agency.

3.1.18 Endangered Species

Endangered Species is a term referring to all species afforded protection under the federal Endangered Species Act (ESA) and includes plant and wildlife species placed on the list of threatened and endangered. Consideration is also given to species that are either candidates or proposed for listing under the ESA. As part of the National Environmental Policy Act (NEPA) process for the Project, the BLM engaged in ESA Section 7 consultation with the United States Fish and Wildlife Service (USFWS) regarding potential impacts to threatened and endangered species (BLM 2024a). A total of 22 species were initially identified throughout the Project Area. Studies were conducted across the entire Project Area to inform analysis of Project-related impacts on these species and their habitats. The results of these studies are incorporated into the NEPA analysis and ESA consultation process and associated documents. Ultimately, nine species were analyzed in detail in the BA; it was determined that the Project would have "*no effect*" on the remaining 13 species. Federally listed species analyzed in detail in the BA included plant species associated with Ash Meadows in southern Nevada, spring-loving centaury (*Centaurium namophilum*), the bi-state population of greater sage-grouse (*Centrocercus urophasianus*), Mojave desert tortoise (*Gopherus agassizi*), southwestern willow flycatcher (*Empidomax traillii extimus*), and yellow-billed cuckoo (*Coccyzus americanus*). Only yellow-billed cuckoo would potentially occur along the Project area included in this document. The BA concluded the Project may affect but would not likely adversely affect yellow-billed cuckoo. The USFWS Biological Opinion (BO) concurred that effects of the Project on the yellow-billed cuckoo would be insignificant and discountable. Please refer to the BA (BLM 2024a) and BO (USFWS 2024) for a full analysis of all ESA-listed species.

3.1.19 Migratory Birds and Bald and Golden Eagles

Migratory birds are protected under the Migratory Bird Treaty Act. Bald eagles (*Haliaeetus leucocephalus*) and Golden Eagles (*Aquila chrysaetos*) are further protected under the Bald and Golden Eagle Protection Act.

A large diversity of migratory birds may occur within the Project Area as seasonal or year-round residents or transient migrants. The Project has been designed to meet standards set by the Avian Power Line Interaction Committee for avian protection. The Project will also meet the Environmental Management Measures listed in the FEIS. The Project will operate under the framework of NV Energy's avian protection plan. A separate Bird and Bat Conservation Strategy and Raven Management Plan have been developed for the Project.

During the FEIS process, pre-construction nest surveys along the Greenlink Common Tie route were conducted from 2021 to 2023, with additional surveys scheduled to occur in 2025. In the

Greenlink Common Tie Project Area, 26 raptor nests were identified within two miles of the ROW. Of the 26 total nests, only one was confirmed to be an active golden eagle nest, as reported in Appendix AB of the FEIS (BLM 2024c). Pre-construction nest surveys in 2025 will confirm the status of previously surveyed nests and will be used to ensure any construction timing and nest buffer restrictions set by the USFWS are met.

3.1.20 Historic Properties

A Class I inventory has been completed for the Greenlink West Project, including the Project Area, associated with (both private and public lands). Additionally, a Class III inventory has been completed for the portions of the Project Area that fall within BLM maintained and operated parcels. Both documents, as well as the NV Energy Greenlink West Transmission Project Historic Properties Treatment Plan (HPTP), are included as Attachment D with this PCN (*A Class I Cultural Resources Inventory for the Greenlink West Project Carson City Study Area* [LaValley, Howard, Charles and Schwartz 2023]; *NV Energy Greenlink West Project Class III Cultural Resources Inventory within the BLM Carson City District and Adjacent Lands, Lyon, Mineral, Storey, and Washoe Counties, Nevada* [LaValley and Schwartz 2024]; *NV Energy Greenlink West Transmission Project Historic Properties Treatment Plan* [Button and Schwartz 2023]).

Multiple NRHP eligible properties are located within the Project Area (LaValley, Howard, Charles, and Schwartz 2023; LaValley and Schwartz 2024; Button and Schwartz 2023). Moreover, a large portion of the Project is located on private land and therefore was not surveyed previously for cultural resources. As such, it is likely the Project will impact both known and potentially unknown historic properties. Planned mitigation measures to potentially eligible historic properties are defined within the HPTP submitted as part of the FEIS and included here in Attachment D. To date, no investigations are planned on private land as they fall outside of the jurisdiction of the BLM. Section 3.1.21 below outlines best practices to follow if an inadvertent discovery is made during construction of the Project. BLM, as the lead federal agency, is consulting with the Nevada State Historic Preservation Office regarding the Section 106 process.

3.1.21 Discovery of Previously Unknown Remains and Artifacts

If uncovered during construction, subsurface deposits, surfaces, or features will be examined by an archeological monitor. The HPTP attached to the FEIS for the Greenlink West Nevada Transmission Line Project, which encompasses this project, is included with this PCN and provides an archaeological testing, mitigation, and monitoring plan for the Project Area in the interest of best practices in the identification, protection, and/or mitigation of archaeological resources.

3.1.22 Designated Critical Resource Waters

The Project Area does not contain designated critical resource waters or will result in discharges of dredged or fill material that affect critical resource waters.

3.1.23 Mitigation

A discussion regarding mitigation measures is provided in Section 2.6 of this document. If necessary, the applicant will work with the district engineer to determine appropriate and practicable mitigation, to ensure that adverse environmental effects are no more than minimal. However, given the nature of the proposed impacts (temporary) and conversion, mitigation is not anticipated to be required.

3.1.24 Safety of Impoundment Structures

This Project does not include the design, construction, or maintenance of any impoundment structure.

3.1.25 Water Quality

The applicant is pursuing a CWA Section 401 Water Quality Certification (WQC) with Nevada Division of Environmental Protection concurrently with USACE NWP 57 authorization.

3.1.26 Coastal Zone Management

The Project Area is not subject to coastal zone management.

3.1.27 Regional and Case-By-Case Conditions

Regional conditions for Nevada are discussed in Section 3.2.

3.1.28 Use of Multiple Nationwide Permits

Only NWP 57 authorization is anticipated for Project development.

3.1.29 Transfer of Nationwide Permit Verifications

To date, no NWPs have been issued for this Project.

3.2 Regional Conditions for Nevada

3.2.1 PCN Submittal

The Project will require installation of three new transmission lines, each spanning the Carson River, a Traditionally Navigable Water. Due to the proposed activity, authorization of a Section 10 Permit in accordance with the Rivers and Harbors Act of 1899 is required. The Project with not result in discharge of dredged/fill material to WOTUS.

3.2.2 Peatlands/below the Ordinary High-Water Mark of the Great Salt Lake Containing Bioherms

This Project will not result in discharge of dredged and/or fill material in peatland or below the ordinary high-water mark (OHWM) of the Great Salt Lake.

3.2.3 Aquatic Resource Delineation

A detailed aquatic resource delineation report has been prepared for the Project Area and has been attached to this PCN submittal (Attachment A).

4.0 SUMMARY

NV Energy will comply with the CWA, Section 404, and adhere to the applicable 2021 NWP 57 General and Regional conditions. Specific actions that will be taken to meet compliance include the following activities:

- NV Energy will meet the requirements of the ESA through the Section 7 consultation process completed between the BLM (lead federal agency for NEPA compliance) and the USFWS.
- NV Energy will meet the requirements for Section 106 of the National Historic Preservation Act through the NEPA process – BLM as the lead federal agency.
- Appropriate BMPs will be implemented to protect surface water quality through the implementation of a SWPPP.
- A summary of Project impacts is provided in the USACE-required Operations and Maintenance Business Information Line, Regulatory Module Table as Attachment E.
- This PCN application has been developed to comply with PCN requirements.

Under CWA Section 401, the Nevada Division of Environmental Protection is responsible for issuing WQCs for federally issued permits, including Section 404 permits. The Nevada Division of Environmental Protection requires that 401 WQC is required for any federal license or permit that authorizes any activity that may result in any discharge from a point source into WOTUS. The certifying authority shall evaluate whether the activity will comply with applicable water quality requirements.

Environmental effects of the Project have been analyzed in detail through the NEPA process, which was finalized June 2024. The BLM, the lead federal agency, has analyzed potential impacts to environmental resources on federal, state, county, and private lands and in coordination with NV Energy, has developed design features, avoidance and minimization measures, and mitigation measures to ensure significant impacts to environmental resources do not result from the construction of the Project.

5.0 REFERENCES

Button and Schwartz. 2023. *NV Energy Greenlink West Project Class III Cultural Resource Inventory, Archaeological Testing, and Monitoring Plan within the Ft. Churchill Substation Expansion Area, Lyon County, Nevada*.

United States Environmental Protection Agency (USEPA). 2012. Level III ecoregions of the continental United States: Corvallis, Oregon, U.S. EPA – National Health and Environmental Effects Research Laboratory. Map scale 1:7,500,000.

United States Department of Interior Fish and Wildlife Service (USFWS). 2024. Formal and Informal Consultation and Formal Conference under Section 7 of the Endangered Species Act for Threatened, Endangered, and Proposed Species and their Proposed Critical Habitat that May Occur as a Result of Actions from the Greenlink West Transmission Line Project, Nevada. June 3, 2024.

United States Department of Interior Bureau of Land Management (BLM). 2024a. Greenlink West Final Biological Assessment. DOI-BLM-NV-0000-2022-0004-EIS. https://eplanning.blm.gov/public_projects/2017391/200514145/20109443/251009437/GLWP_Final%20Biological%20Assessment_240206.pdf. February 2024.

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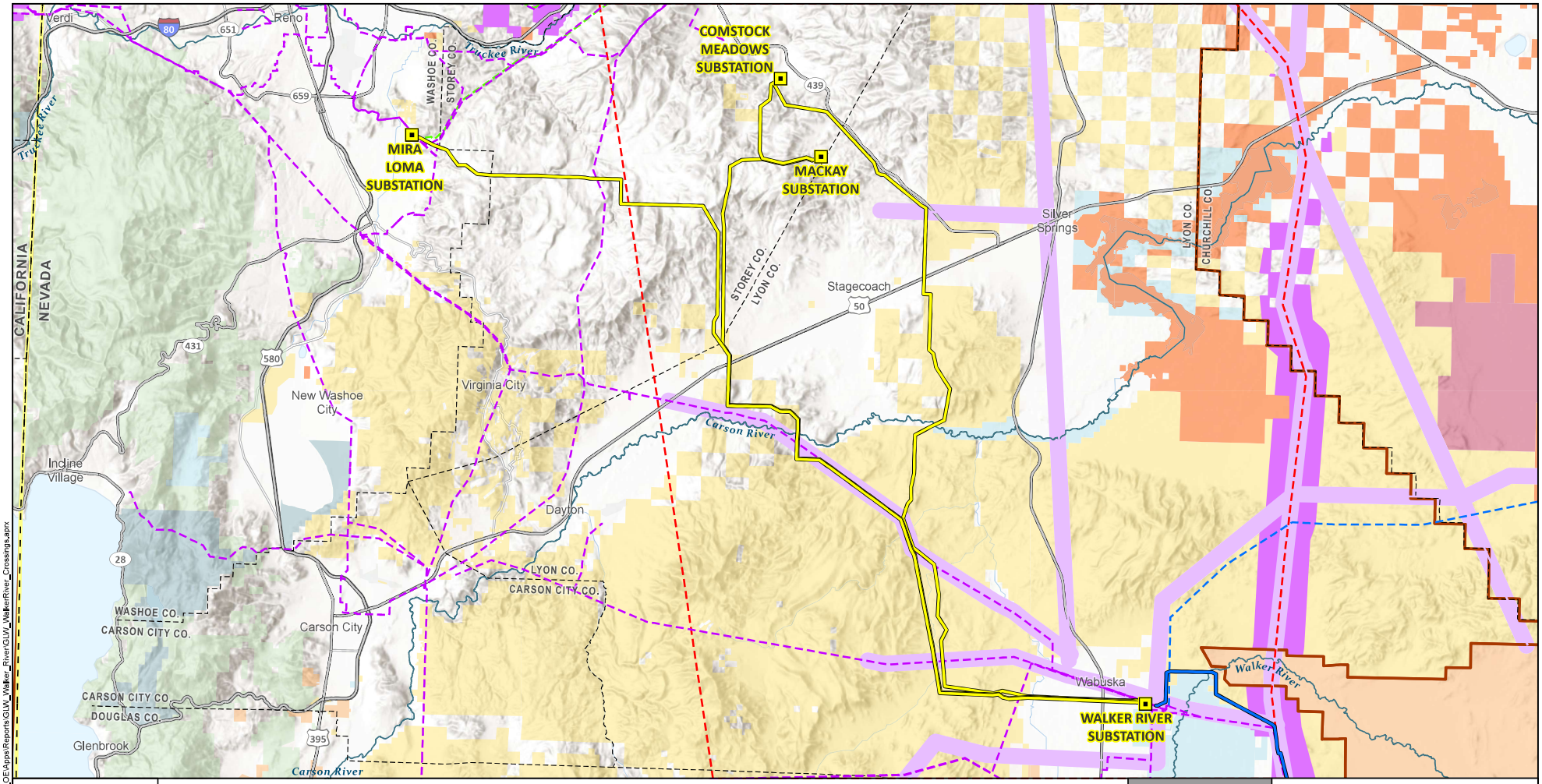
_____. 2024e. FEIS Appendix H: Bird and Bat Conservation Strategy. https://eplanning.blm.gov/public_projects/2017391/200514145/20113621/251013612/Appendix%20H%20-%20Bird%20and%20Bat%20Conservation%20Strategy.pdf. June 2024,


COMSTOCK MEADOWS SUBSTATION
MIRA LOMA SUBSTATION
MACKAY SUBSTATION
WALKER RIVER SUBSTATION
Verdi
Reno
Truckee River
WASHOE CO.
STOREY CO.
LYON CO.
CHURCHILL CO.
CALIFORNIA
NEVADA
Silver Springs
Stagecoach
New Washoe City
Virginia City
Carson River
Indine Village
Dayton
CARSON CITY CO.
Carson City
Wabuska
Walker River
DOUGLAS CO.
Glenbrook
651
80
659
439
50
431
580
28
395
0 2 4
Miles
Scale: 1:250,000
Date: 1/30/2025
Project Features
Project Substation
Proposed Transmission Centerline - Common Tie
Proposed Transmission Centerline - Greenlink West
Reference Features
500 kV+ Transmission Line
345 kV Transmission Line
230 kV Transmission Line
120 - 138 kV Transmission Line
Highway
River (NHD)
County Line
State Line
BLM Field Office Boundary
BLM Legacy Locally Designated Utility Corridor
West-Wide Energy Corridor
Bureau of Land Management
U.S. Forest Service
Bureau of Reclamation
U.S. Department of Defense
Tribal Land
State Land
Local Land
Source: U.S. Forest Service, Bureau of Land Management, National Park Service, U.S. Department of Defense, Platts
MIRA LOMA SUBSTATION
COMSTOCK MEADOWS SUBSTATION
WALKER RIVER SUBSTATION
NEVADA
ESMERALDA SUBSTATION
SAGEBRUSH SUBSTATION
NORTHWEST SUBSTATION
HARRY ALLEN SUBSTATION
GREENLINK COMMON TIE TRANSMISSION LINE PROJECT
Pre-Construction Notification
Figure 1
Topographic/Vicinity Map
Overview
NVEnergy
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0 50 100
US Feet

1 inch = 100 feet

Date: 2/4/2025

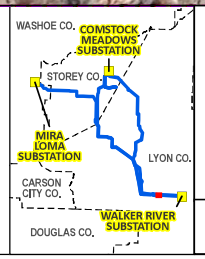
Project Features

- Structure Location
- Proposed Transmission Centerline
- Proposed 200-foot Right-of-Way
- Structure Work Area
- Pull Site

Survey Features

- Wetland
- Impacted Aquatic Feature (Temporary - Construction Matting)

Source: U.S. Forest Service, Bureau of Land Management, National Park Service, U.S. Department of Defense, Platts



GREENLINK COMMON TIE TRANSMISSION LINE PROJECT

Pre-Construction Notification

Figure 2
Impacts to Surveyed Aquatic Resources
Sheet 1 of 2

NVEnergy

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US Feet

1 inch = 100 feet

Date: 2/4/2025

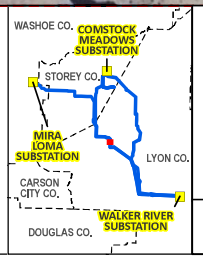
Project Features

- Proposed Transmission Centerline
- Proposed 200-foot Right-of-Way
- Pull Site

Survey Features

- Wetland
- Impacted Aquatic Feature (Temporary)

Source: U.S. Forest Service, Bureau of Land Management, National Park Service, U.S. Department of Defense, Platts



GREENLINK COMMON TIE TRANSMISSION LINE PROJECT

Pre-Construction Notification

Figure 2
Impacts to Surveyed Aquatic Resources
Sheet 2 of 2

NVEnergy

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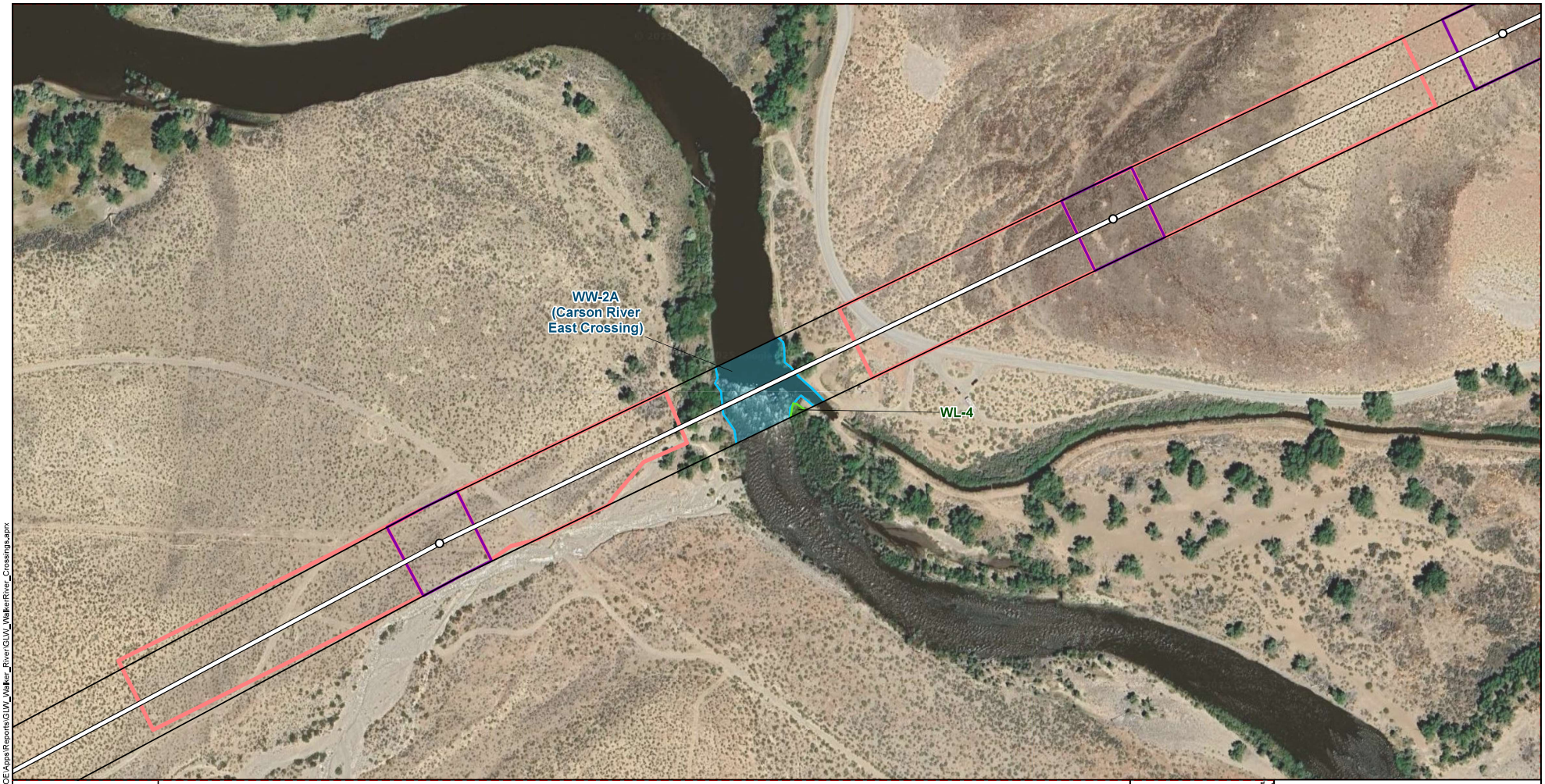

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US Feet

1 inch = 200 feet

Date: 1/29/2025

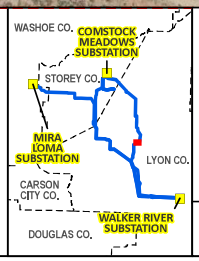
Project Features

- Structure Location
- Proposed Transmission Centerline
- Proposed 200-foot Right-of-Way
- Structure Work Area
- Pull Site

Survey Features

- Waterway
- Wetland

Source: U.S. Forest Service, Bureau of Land Management, National Park Service, U.S. Department of Defense, Platts



GREENLINK COMMON TIE TRANSMISSION LINE PROJECT

Pre-Construction Notification

Figure 3

Surveyed Aquatic Resources
Carson River Crossings

Sheet 1 of 2

NVEnergy

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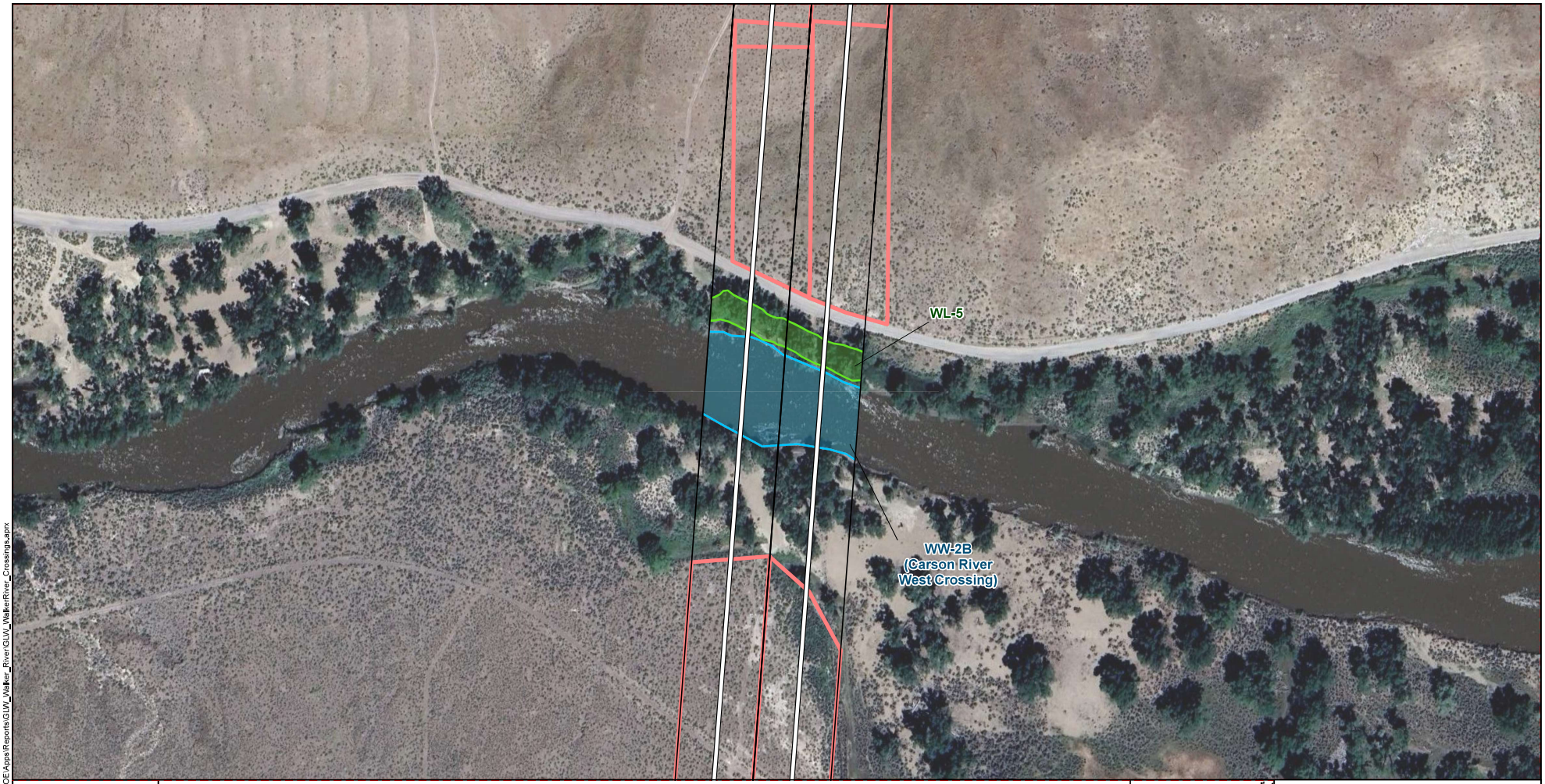

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US Feet

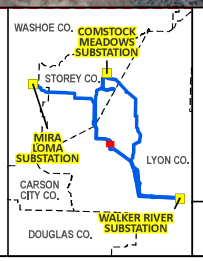
1 inch = 200 feet

Date: 1/29/2025

Project Features
- Proposed Transmission Centerline
- Proposed 200-foot Right-of-Way
- Pull Site

Survey Features
- Waterway
- Wetland

Source: U.S. Forest Service, Bureau of Land Management, National Park Service, U.S. Department of Defense, Platts



GREENLINK COMMON TIE TRANSMISSION LINE PROJECT

Pre-Construction Notification

Figure 3

Surveyed Aquatic Resources
Carson River Crossings

Sheet 2 of 2

NVEnergy

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