

Agenda



County of Inyo Board of Supervisors

Board of Supervisors Room
County Administrative Center
224 North Edwards
Independence, California

NOTICE TO THE PUBLIC: In order to minimize the spread of the COVID-19 virus, Governor Newsom has issued Executive Orders that temporarily suspend certain requirements of the Brown Act. Please be advised that the Board of Supervisors Chambers are closed to the public, the Board will be conducting its meetings exclusively online.

Board Members and Staff will participate via Zoom webinar, accessible to the public at <https://zoom.us/j/868254781>. Individuals will be asked to provide their name and an email address in order to access the videoconference. Anyone who does not want to provide their email address may use the following generic, non-functioning address to gain access: donoreply@inyocounty.us.

Anyone wishing to make either a general public comment or a comment on a specific agenda item prior to the meeting or as the item is being heard, may do so either in writing or by utilizing the Zoom "hand-waving feature" when appropriate during the meeting (the Chair will call on those who wish to speak). Written public comment, limited to **250 words or less**, may be emailed to the Assistant Clerk of the Board at boardclerk@inyocounty.us. Your comments may or may not be read aloud, but all comments will be made a part of the record. Please make sure to submit a separate email for each item that you wish to comment upon.

Public Notices: (1) In Compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting please contact the Clerk of the Board at (760) 878-0373. (28 CFR 35.102-35.104 ADA Title II). Notification 48 hours prior to the meeting will enable the County to make reasonable arrangements to ensure accessibility to this meeting. Should you because of a disability require appropriate alternative formatting of this agenda, please notify the Clerk of the Board 72 hours prior to the meeting to enable the County to make the agenda available in a reasonable alternative format. (Government Code Section 54954.2). (2) If a writing, that is a public record relating to an agenda item for an open session of a regular meeting of the Board of Supervisors, is distributed less than 72 hours prior to the meeting, the writing shall be available for public inspection at the Office of the Clerk of the Board of Supervisors, 224 N. Edwards, Independence, California and is available per Government Code § 54957.5(b)(1).

Note: Historically the Board does break for lunch; the timing of a lunch break is made at the discretion of the Chairperson and at the Board's convenience.

January 5, 2021 - 9:00 AM

1. **PLEDGE OF ALLEGIANCE** (Join meeting via Zoom [here](#))
2. **ELECTION OF OFFICERS** – The Board will elect a Chairperson and Vice-Chairperson for Calendar 2021.
3. **PUBLIC COMMENT**
4. **COUNTY DEPARTMENT REPORTS** (Reports limited to two minutes)
5. **COVID-19 STAFF UPDATE**

DEPARTMENTAL - PERSONNEL ACTIONS

6. **Health & Human Services** - Request Board find that, consistent with the adopted Authorized Position Review Policy: A) the availability of funding for one (1) Office Tech III exists in one or more HHS non-General Fund budgets, as certified by the HHS Director and concurred with by the County Administrator and Auditor-Controller; B) where internal candidates may meet the qualifications for the position, the vacancy could possibly be filled through an internal recruitment, but an open recruitment is more appropriate to ensure qualified applicants apply; and C) approve the hiring of one (1) Office Tech III at Range 63 (\$4,023-4,895).

7. **Health & Human Services** - Request Board find that, consistent with the adopted Authorized Position Review Policy: A) the availability of funding for one (1) Administrative Analyst I-III exists in various HHS non-General Fund budgets, as certified by the HHS Director and concurred with by the County Administrator and Auditor-Controller; B) where internal candidates may meet the qualifications for the position, the vacancy could possibly be filled through an internal recruitment, but as a State Merit System position, an open recruitment is more appropriate to ensure qualified applicants apply; and C) approve the hiring of one (1) Administrative Analyst I at Range 68 (\$4,533-5,508), Administrative Analyst II at Range 70 (\$4,753-5781) or Administrative Analyst III at Range 72 (\$4,981-6050), contingent upon qualifications.

8. **Health & Human Services - ESAAA** - Request Board find that, consistent with the adopted Authorized Position Review Policy: A) the availability of funding for one (1) B-PAR Program Services Assistant I, II, III and one (1) A-PAR Program Services Assistant I, II, III exists, as certified by the HHS Director and concurred with by the County Administrator and Auditor-Controller; B) where internal candidates may meet the qualifications for the position, the vacancy could possibly be filled through an internal recruitment, but an open recruitment is more appropriate to ensure qualified applicants apply; and C) approve the hiring of one (1) B-PAR Program Services Assistant I, II, III for the Bishop Senior Center and one (1) A-PAR Program Services Assistant I, II, III for the Lone Pine Senior Center at Range 39PT (\$12.41 - \$15.07/hr.) or Range 42PT (\$13.27 - \$16.15/hr.) or Range 50PT (\$15.97 - \$19.39/hr.), depending upon qualifications.

9. **Public Works** - Request Board find that, consistent with the adopted Authorized Position Review Policy: A) the availability of funding for one (1) Building Maintenance Worker I, II, III, IV exists in General Fund and non-General Fund budgets, as certified by the Public Works Director and concurred with by the County Administrator and Auditor-Controller; B) where internal candidates may meet the qualifications for the position, the vacancy could possibly be filled through an internal recruitment, but an open recruitment is more appropriate to ensure qualified applicants apply; C) approve the hiring of one (1) Building Maintenance Worker I at Range 56 (\$3,425 - \$4,155); Building Maintenance Worker II at Range 60 (\$3,758 - \$4,564); Building Maintenance Worker III at Range 62 (\$3,936 - \$4,786); or Building Maintenance Worker IV at Range 64 (\$4,124 - \$5,011) depending on qualifications; and D) if an internal candidate is hired as a result of the open recruitment, authorize the Public Works Director to backfill resulting vacancy.

CONSENT AGENDA (Approval recommended by the County Administrator)

10. **County Administrator - Motor Pool** - Request Board authorize an increase of Motor Pool purchasing authority with Bishop Ford of Bishop, CA by \$20,000, to a total not-to-exceed amount of \$45,000, for preventative maintenance and repair of Motor Pool vehicles.

11. **County Administrator - Motor Pool** - Request Board authorize a purchase order in an amount not to exceed \$7,209, payable to Inyo Mono Body Shop of Bishop, CA for body repair of two Motor Pool vehicles, which would be in addition to the current blanket purchase order for Inyo Mono Body Shop in the amount of \$15,000, for a total not-to-exceed amount for this vendor of \$22,209.

12. **Health & Human Services - Health/Prevention** - Request Board approve the Memorandum of Understanding between the County of Inyo and the California

Department of Public Health for the provision of laboratory testing services for human infectious diseases of public health effective upon execution until thirty days after the lifting of the declaration of the COVID-19 state of emergency, contingent upon the Board's approval of future budgets, and authorize the HHS Deputy Director of Public Health to sign.

13. **Health & Human Services - Social Services** - Request Board: A) declare eXemplar Human Services of Reno, NV a sole-source provider of customized Social Service reporting tools and services; B) approve the agreement between the County of Inyo and eXemplar Human Services of Reno, NV for the provision of customized Social Service reporting tools and services in an amount not to exceed \$120,000.00 for the period of February 1, 2021 to January 31, 2023, contingent upon the Board's approval of future budgets, and authorize the Chairperson to sign, contingent upon all appropriate signatures being obtained.
14. **Public Works** - Request Board approve Resolution No. 2021-01, titled, "A Resolution of the Board of Supervisors of the County of Inyo, State of California Authorizing the Recording of a Notice of Completion for the Annex HVAC Retrofit Project," and authorize the Chairperson to sign.
15. **Public Works** - Request Board: A) award the contract for the North Round Valley Bridge Over Pine Creek Replacement Project to Spiess Construction Company of Santa Maria, CA as the successful bidder; B) approve the construction contract between the County of Inyo and Spiess Construction Company of Santa Maria, CA in the amount of \$3,334,502.55 and authorize the Chairperson to sign, contingent upon all appropriate signatures being obtained; and C) authorize the Public Works Director to execute all other project contract documents, including contract change orders, to the extent permitted by Public Contract Code Section 20142 and other applicable laws.

DEPARTMENTAL (To be considered at the Board's convenience)

16. **Health & Human Services - First 5** - Request Board approve a proclamation declaring January 2021 as Positive Parenting Awareness Month in Inyo County.
17. **Board of Supervisors** - Request Board consider and approve sending a joint letter from the Board of Supervisors and Bishop City Council asking for Airbnb's cooperation in discouraging bookings while Inyo County is under a Regional Stay at Home Order.
18. **Planning Department** - Request Board review the West-wide Energy Corridor, Regions 4, 5 and 6, Report (specifically Region 5) and draft correspondence (Attachment 1); provide comments; and, authorize the Chairperson to sign.
19. **Planning Department** - Request the Board appoint two Supervisors as Tribal Consultation Committee members for each of the recognized Tribes in the County, for appointments beginning January 1, 2021 and ending December 31, 2021.
20. **Agricultural Commissioner - Cannabis** - Request Board approve Resolution No. 2021-02 titled, "A Resolution of the Board of Supervisors, County of Inyo, State of California Extending the Deadline for Commercial Cannabis Business License Requirements for Commercial Cannabis Business License Numbers 000123 and

000128," and authorize the Chairperson to sign.

21. **Agricultural Commissioner - Cannabis** - Request Board approve Resolution No. 2021-03 titled, "A Resolution of the Board of Supervisors, County of Inyo, State of California Extending the Deadline for Commercial Cannabis Business License Requirements for Commercial Cannabis Business License Number 000124," and authorize the Chairperson to sign.
22. **Agricultural Commissioner - Cannabis** - Request Board approve Resolution No. 2021-04 titled, "A Resolution of the Board of Supervisors, County of Inyo, State of California Extending the Deadline for Commercial Cannabis Business License Requirements for Commercial Cannabis Business License Number 000125" and authorize the Chairperson to sign.
23. **Agricultural Commissioner - Cannabis** - Request Board approve Resolution No. 2021-05 titled, "A Resolution of the Board of Supervisors, County of Inyo, State of California Extending the Deadline for Commercial Cannabis Business License Requirements for Commercial Cannabis Business License Number 000142," and authorize the Chairperson to sign.
24. **Public Works** - Request the Board: A) amend the Fiscal Year 2020-2021 Consolidated Office Building Budget 011809 by increasing appropriation in Office and Other Equipment object code (5232) by \$800,000 (*4/5ths vote required*); and B) approve a purchase order in an amount not to exceed \$800,000, payable to Source Creative Office Interiors of Orange County, CA for office furnishings for the new office building at 1360 N. Main Street, Bishop, CA.
25. **Public Works** - Request Board:
 - A) Approve the proposed resolution No. 2021-06, titled, "A Resolution of the Board of Supervisors, County of Inyo, State of California, Ratifying Change Orders to the Contract with Qualcon Contractors Inc. for the Taxiway Rehabilitation Project at the Bishop Airport," and authorize the Chairperson to sign; and
 - B) Approve the proposed resolution No. 2021-07, titled, "A Resolution of the Board of Supervisors of the County of Inyo, State of California Authorizing the Recording of a Notice of Completion for the Bishop Airport - Taxiway Rehabilitation Project," and authorize the Chairperson to sign.
26. **Health & Human Services** - Request Board: A) conduct workshop with HHS staff on the Statewide Medi-Cal Managed Care Procurement and Potential Impacts to Inyo County; and B) provide follow-up direction to staff as necessary.
27. **Health & Human Services - Behavioral Health** - Request Board ratify and approve the contract between the County of Inyo and North American Mental Health Services of Redding, CA for the provision of telepsychiatry services in an amount not to exceed \$163,000 for the period of January 1, 2021 through June 30, 2021, and authorize the Chairperson to sign, contingent upon all appropriate signatures being obtained.
28. **Health & Human Services** - Request the Board ratify and approve the Fiscal Year 2020-2021 Children's Medical Services (CMS) Plan and Budgets and authorize the Chairperson to sign the Certification Statements.

29. **Clerk-Recorder** - Request Board receive presentation on AB 571, which sets default campaign contributions for county candidates when a county has not already enacted laws addressing contribution limits.
30. **County Administrator - Personnel** - Request Board: A) approve the contract between the County of Inyo and Jerry Oser for the provision of personal services as the Environmental Health Director at a monthly salary of \$8,918.00 effective January 7, 2021 and authorize the Chairperson to sign; and B) approve Resolution No. 2021-08, titled, " A Resolution of the Board of Supervisors, County of Inyo, State of California, Amending Resolution 2006-06, Changing Salary and/or Terms and Conditions of Employment for Appointed Officials Employed in the Several Offices or Institutions of the County of Inyo," and authorize the Chairperson to sign.

TIMED ITEMS (Items will not be considered before scheduled time but may be considered any time after the scheduled time.)

31. **10:30 A.M. - COUNTY COUNSEL** - Request Board approve an ordinance titled, "An Ordinance of the Board of Supervisors, County of Inyo, State of California, Amending and Repealing Certain Sections of Title 11 of the Inyo County Code Related to Change Orders in Public Works Contracts."
32. **10:30 A.M. - AG COMMISSIONER-CANNABIS** - Request Board: A) conduct a hearing on the revocation for non-payment of commercial cannabis business license number 000142 issued to Old Spanish Cannabis and Commerce Park, LLC, as requested in an appeal by the licensee; and B) make a determination based on the hearing to revoke or not revoke license number 000142.

COMMENT (Portion of the Agenda when the Board takes comment from the public and County staff)

33. **PUBLIC COMMENT**

BOARD MEMBERS AND STAFF REPORTS



County of Inyo



Health & Human Services

DEPARTMENTAL - PERSONNEL ACTIONS - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Melissa Best-Baker

SUBJECT: Request for authorization to hire a full time Office Technician III in the HHS Fiscal division.

RECOMMENDED ACTION:

Request Board find that, consistent with the adopted Authorized Position Review Policy: A) the availability of funding for one (1) Office Tech III exists in one or more HHS non-General Fund budgets, as certified by the HHS Director and concurred with by the County Administrator and Auditor-Controller; B) where internal candidates may meet the qualifications for the position, the vacancy could possibly be filled through an internal recruitment, but an open recruitment is more appropriate to ensure qualified applicants apply; and C) approve the hiring of one (1) Office Tech III at Range 63 (\$4,023-4,895).

SUMMARY/JUSTIFICATION:

Health and Human Services (HHS) is requesting to fill a budgeted full-time Office Technician III position in the HHS Fiscal Division, which recently became vacant when an employee accepted a position in another department. This position is responsible for receiving and processing payables for all HHS divisions, depositing and tracking payments as well as State and Federal revenue, assisting the Administrative Analysts in maintaining more complex tracking for revenues/expenditures, compiling monthly program Account Director Reports, processing HHS payroll, reconciling internal charges to appropriate HHS budgets, Behavioral Health and Public Health billing, DDP monthly client invoicing, and FIRST program expenditure tracking. This position also cross-trains within HHS Fiscal to insure that there is coverage across multiple budgets in case of vacancies. The Department respectfully requests authorization to recruit and hire an Office Technician III.

BACKGROUND/HISTORY OF BOARD ACTIONS:

N/A

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

Your Board could choose not to approve the filling of this position which could negatively impact the timeliness of claims being submitted and could cause delays in payments to vendors due to the shortage of staff in the fiscal division.

OTHER AGENCY INVOLVEMENT:

County Auditor's Office, Treasurer's Office and Information Services

FINANCING:

State, Federal, and Realignment funds. This position is budgeted 10% in Health (045100), 30% in Mental Health (045200), 55 in DDP (045312), 25% in SUD (045315), 25% in Social Services and 5% in WIC (641919/20) in the Salaries and Benefits object codes. No County General Fund.

ATTACHMENTS:

APPROVALS:

Melissa Best-Baker	Created/Initiated - 12/15/2020
Darcy Ellis	Approved - 12/16/2020
Marilyn Mann	Approved - 12/16/2020
Rhiannon Baker	Approved - 12/16/2020
Sue Dishion	Approved - 12/22/2020
Amy Shepherd	Approved - 12/22/2020
Melissa Best-Baker	Approved - 12/22/2020
Marilyn Mann	Final Approval - 12/23/2020



County of Inyo



Health & Human Services

DEPARTMENTAL - PERSONNEL ACTIONS - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Melissa Best-Baker

SUBJECT: Authorization to hire a full time Administrative Analyst I/II/III in the HHS Fiscal Division.

RECOMMENDED ACTION:

Request Board find that, consistent with the adopted Authorized Position Review Policy: A) the availability of funding for one (1) Administrative Analyst I-III exists in various HHS non-General Fund budgets, as certified by the HHS Director and concurred with by the County Administrator and Auditor-Controller; B) where internal candidates may meet the qualifications for the position, the vacancy could possibly be filled through an internal recruitment, but as a State Merit System position, an open recruitment is more appropriate to ensure qualified applicants apply; and C) approve the hiring of one (1) Administrative Analyst I at Range 68 (\$4,533-5,508), Administrative Analyst II at Range 70 (\$4,753-5781) or Administrative Analyst III at Range 72 (\$4,981-6050), contingent upon qualifications.

SUMMARY/JUSTIFICATION:

Health and Human Services is requesting to fill a vacancy in our Fiscal division which is due to an employee leaving the area. This position is primarily responsible for the consolidated Social Services budgets, both County and State budgets, as well as claims and all reconciliations with Social Services funding. Some of the specific duties include:

- County and State Budget creation, monitoring, claiming, and analyzing spending patterns;
- Monitoring and completing Social Service program claims: CalWORKS, Foster Care, Adoption Assistance, Temporary Assistance for Needy Families (TANF), Child Protective Services, Adult Protective Services, Employment and Eligibility and Social Services Realignment;
- Preparing regular management reports for the Department's internal monitoring and revenue and expense forecasting;
- Process quarterly State claims for ESAAA;
- Lead supervision of HHS payroll activities;
- Review and process payments for all HHS contracts; and
- Complete various stages of the monthly Behavioral Health Medi-Cal claiming process.

In addition to the above duties, provides supervision to Office Technicians to ensure that all of the Account Payables/Receivables for the fiscal division occur accurately and timely.

This position works closely with the Senior Management Analyst to ensure all funding sources are kept up to date and that all key issues are immediately brought to administrative attention and are addressed. Additionally, all Administrative Analysts and the Senior Management Analyst in the Fiscal division continue to work closely together to ensure that all funding sources are pursued and maximized. The Department respectfully requests

approval to fill this position.

BACKGROUND/HISTORY OF BOARD ACTIONS:

N/A

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

The Board could choose not to allow the Fiscal division to hire an Administrative Analyst, which could negatively impact State revenues and State reporting requirements.

OTHER AGENCY INVOLVEMENT:

Inyo County Auditor and Treasury Offices

FINANCING:

State and Federal funding and Health, Behavioral Health and Social Services Realignment. Funding for this position would be 5% in Health (045100), 5% in CMH (045200), 50% in Social Services (055800) and 5% in WIOA (613720), 25% in Tobacco (640317) and 10% in ESAAA (683000) in the salaries and benefits object codes. No County General Funds.

ATTACHMENTS:

APPROVALS:

Melissa Best-Baker	Created/Initiated - 12/16/2020
Darcy Ellis	Approved - 12/16/2020
Rhiannon Baker	Approved - 12/16/2020
Marilyn Mann	Approved - 12/16/2020
Sue Dishion	Approved - 12/17/2020
Amy Shepherd	Approved - 12/17/2020
Melissa Best-Baker	Approved - 12/17/2020
Marilyn Mann	Final Approval - 12/17/2020



County of Inyo



Health & Human Services - ESAAA DEPARTMENTAL - PERSONNEL ACTIONS - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Rhiannon Baker

SUBJECT: Request to Hire two Program Services Assistants (PSA) I, II or III in the ESAAA/IC-Gold program.

RECOMMENDED ACTION:

Request Board find that, consistent with the adopted Authorized Position Review Policy: A) the availability of funding for one (1) B-PAR Program Services Assistant I, II, III and one (1) A-PAR Program Services Assistant I, II, III exists, as certified by the HHS Director and concurred with by the County Administrator and Auditor-Controller; B) where internal candidates may meet the qualifications for the position, the vacancy could possibly be filled through an internal recruitment, but an open recruitment is more appropriate to ensure qualified applicants apply; and C) approve the hiring of one (1) B-PAR Program Services Assistant I, II, III for the Bishop Senior Center and one (1) A-PAR Program Services Assistant I, II, III for the Lone Pine Senior Center at Range 39PT (\$12.41 - \$15.07/hr.) or Range 42PT (\$13.27 - \$16.15/hr.) or Range 50PT (\$15.97 - \$19.39/hr.), depending upon qualifications.

SUMMARY/JUSTIFICATION:

Two PSA positions recently became vacant, one A-PAR in Lone Pine and one B-PAR in Bishop, when both employees transitioned to new positions within Health and Human Services. These positions provide support services including, but not limited to: assisting the cook in the kitchen with meal prep/clean-up or serving of meals, meal delivery to home bound seniors, assisted transportation to medical appointments as well as homemaking services for the B-PAR position. The PSA is also available to provide support in other program functions during staff absences in both the Bishop and Lone Pine facilities.

We are respectfully requesting permission to fill these vacancies at either a I, II or III level in order to ensure the provision of services at our Bishop and Lone Pine Senior Centers.

BACKGROUND/HISTORY OF BOARD ACTIONS:

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

The Board could choose not to allow HHS to fill these positions, which would impact the ability of the Senior Programs' Bishop and Lone Pine sites, to ensure adequate coverage of meal delivery routes and other support services, especially during periods of staff absences. This may lead to higher costs for the ESAAA program if absences are covered by higher paid staff and/or staff who have to travel from one site to the other in order to

provide coverage.

OTHER AGENCY INVOLVEMENT:

None

FINANCING:

State and Federal funding and County General Fund. These positions are budgeted 60% in ESAAA (683000); and 40% in IC GOLD (056100) in the salaries and benefits object codes.

ATTACHMENTS:

APPROVALS:

Rhiannon Baker	Created/Initiated - 12/18/2020
Darcy Ellis	Approved - 12/23/2020
Melissa Best-Baker	Approved - 12/23/2020
Marilyn Mann	Approved - 12/23/2020
Sue Dishion	Approved - 12/24/2020
Amy Shepherd	Approved - 12/24/2020
Marilyn Mann	Final Approval - 12/24/2020



County of Inyo



Public Works

DEPARTMENTAL - PERSONNEL ACTIONS - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Chris Cash

SUBJECT: Request your Board authorize the recruitment and hiring of a Building Maintenance Worker I/II/III/IV and authorize backfill if an internal candidate is hired.

RECOMMENDED ACTION:

Request Board find that, consistent with the adopted Authorized Position Review Policy: A) the availability of funding for one (1) Building Maintenance Worker I, II, III, IV exists in General Fund and non-General Fund budgets, as certified by the Public Works Director and concurred with by the County Administrator and Auditor-Controller; B) where internal candidates may meet the qualifications for the position, the vacancy could possibly be filled through an internal recruitment, but an open recruitment is more appropriate to ensure qualified applicants apply; C) approve the hiring of one (1) Building Maintenance Worker I at Range 56 (\$3,425 - \$4,155); Building Maintenance Worker II at Range 60 (\$3,758 - \$4,564); Building Maintenance Worker III at Range 62 (\$3,936 - \$4,786); or Building Maintenance Worker IV at Range 64 (\$4,124 - \$5,011) depending on qualifications; and D) if an internal candidate is hired as a result of the open recruitment, authorize the Public Works Director to backfill resulting vacancy.

SUMMARY/JUSTIFICATION:

The Public Works Building & Maintenance Department lost an employee due to outside recruitment to another agency as of December 4, 2020. This position is critical for routine and required maintenance to all county facilities as well as repairs to the Laws, Independence and Lone Pine Water Systems infrastructure. The Building & Maintenance Department typically responds to over 1,000 county building work orders annually as well as work orders for repairs to the Water Systems.

BACKGROUND/HISTORY OF BOARD ACTIONS:

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

The Board could choose not to fill this vacancy, however this is not recommended as this position is crucial and responds to a high volume of work orders for all county facilities as well as repairs to the Laws, Lone Pine and Independence Water Systems infrastructure.

OTHER AGENCY INVOLVEMENT:

Personnel

Auditor's Office

FINANCING:

This position is funded 90% Building Maintenance budget number 011100 and 10% Water Systems budget number 152198 in salaries and benefits object codes. This position is included in the 20/21 fiscal year budget.

ATTACHMENTS:

APPROVALS:

Breanne Nelums	Created/Initiated - 12/10/2020
Darcy Ellis	Approved - 12/10/2020
Breanne Nelums	Approved - 12/10/2020
Chris Cash	Approved - 12/10/2020
Michael Errante	Approved - 12/10/2020
Sue Dishion	Approved - 12/10/2020
Amy Shepherd	Approved - 12/11/2020
Michael Errante	Final Approval - 12/11/2020



County of Inyo



County Administrator - Motor Pool

CONSENT - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Leslie Chapman

SUBJECT: Authorization to increase blanket purchase order to Bishop Ford

RECOMMENDED ACTION:

Request Board authorize an increase of Motor Pool purchasing authority with Bishop Ford of Bishop, CA by \$20,000, to a total not-to-exceed amount of \$45,000, for preventative maintenance and repair of Motor Pool vehicles.

SUMMARY/JUSTIFICATION:

On July 14, 2020 your Board approved a blanket purchase order to Bishop Ford in an amount of \$25,000 for the maintenance of Motor Pool vehicles. We find it necessary to increase our purchase order with Bishop Ford and request your Board's authorization for the increase.

Having an open purchase order will expedite repairs by allowing us to process payments in a timely manner and provides for efficiency in the Auditor's office in issuing warrants. Increasing this purchase order will not negate the requirement of getting verbal or written quotes for individual purchases in accordance with the County Purchasing Policy.

BACKGROUND/HISTORY OF BOARD ACTIONS:

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

Your Board could choose not to authorize an increase in this blanket purchase order. In that event a separate purchase order for each individual transaction would be used. The net effect would result in a delay every time a motor pool vehicle requires service.

OTHER AGENCY INVOLVEMENT:

Auditor/Controller

FINANCING:

Included in the Motor Pool budget for the 2020-2021 fiscal year budget 200100 object code 5171 and 5173.

ATTACHMENTS:

APPROVALS:

Teresa Elliott
Darcy Ellis
Leslie Chapman
Amy Shepherd
Leslie Chapman

Created/Initiated - 12/10/2020
Approved - 12/10/2020
Approved - 12/11/2020
Approved - 12/11/2020
Final Approval - 12/11/2020



County of Inyo



County Administrator - Motor Pool

CONSENT - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Leslie Chapman

SUBJECT: Request purchase order for body repair of two Motor Pool vehicles

RECOMMENDED ACTION:

Request Board authorize a purchase order in an amount not to exceed \$7,209, payable to Inyo Mono Body Shop of Bishop, CA for body repair of two Motor Pool vehicles, which would be in addition to the current blanket purchase order for Inyo Mono Body Shop in the amount of \$15,000, for a total not-to-exceed amount for this vendor of \$22,209.

SUMMARY/JUSTIFICATION:

Two Ford Focus Motor Pool vehicles being utilized by the Probation Department, asset numbers 8836 and 9490, were recently damaged in an accident involving a drunk driver that hit our vehicles while they were parked. Motor Pool will be receiving reimbursement for the accident.

Motor Pool received two bids each for the repairs of the vehicles. Inyo Mono Body Shop was the successful bidder in both bids. Bid results are attached in Attachment A.

BACKGROUND/HISTORY OF BOARD ACTIONS:

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

Your Board could choose not to approve the repair of the Motor Pool vehicles at this time; however, it is not Staff's recommendation due to the fact that the Probation Department utilizes these vehicles daily.

OTHER AGENCY INVOLVEMENT:

FINANCING:

The recommended cost of repairs is included in the 2020/2021 Motor Pool Budget 200100, object code 5171.

ATTACHMENTS:

1. Attachment A

APPROVALS:

Teresa Elliott
Darcy Ellis
Denelle Carrington
Leslie Chapman
Marshall Rudolph
Amy Shepherd
Leslie Chapman

Created/Initiated - 12/4/2020
Approved - 12/4/2020
Approved - 12/10/2020
Approved - 12/11/2020
Approved - 12/11/2020
Approved - 12/11/2020
Final Approval - 12/11/2020

Attchment A

Asset # 9490

2015 Ford Focus

Inyo Mono Body Shop \$4,980.58

Sierra Auto Body \$5,251.63

Asset # 8836

2010 Ford Focus

Inyo Mono Body Shop \$2,227.95

Sierra Auto Body \$2,508.15



County of Inyo



Health & Human Services - Health/Prevention

CONSENT - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Rhiannon Baker

SUBJECT: MOU between Inyo County and Human Services and the California Department of Public Health for Testing Resources

RECOMMENDED ACTION:

Request Board approve the Memorandum of Understanding between the County of Inyo and the California Department of Public Health for the provision of laboratory testing services for human infectious diseases of public health effective upon execution until thirty days after the lifting of the declaration of the COVID-19 state of emergency, contingent upon the Board's approval of future budgets, and authorize the HHS Deputy Director of Public Health to sign.

SUMMARY/JUSTIFICATION:

Inyo County, like most small counties, does not operate a public health laboratory at the local level. The limited amount of clinical services that are provided by the Inyo County HHS Public Health office can be reasonably managed through private laboratories, and/or via referrals to laboratory services provided at area hospitals. Occasionally, lab specimens for diagnosing uncommon diseases, for example, zika virus, may be processed by the California Department of Public Health Viral and Rickettsial Disease laboratory in the Bay Area, when requested by the Health Officer.

In response to the evolution and increasing severity of the COVID-19 pandemic, the California Department of Public Health has made available the Valencia Branch Laboratory to support counties in the event that we need to rapidly deploy testing capacity to respond to a COVID-19 surge or outbreak. Establishing an agreement with a public health laboratory that is near Inyo County will ensure additional lab capacity to support the expanded testing, in addition to continuing to use local hospital and commercial laboratory resources. Through this MOU Inyo County will receive; laboratory testing services of collected samples for COVID-19; the provision of sample collection kits and shipping materials necessary for collecting samples; and software for participant registration, intake, and association of the participant file with the specimen. In addition, the contractor will notify patients that test results are available through SMS and/or email message, within 48 hours after the specimen to be tested is received at CDPH's Valencia Branch Laboratory. CDPH will be responsible for the costs of laboratory testing and processing of collected samples at the Valencia Branch Laboratory.

In order to add these services to our COVID-19 response resources, we respectfully request your Board approve the attached MOU.

BACKGROUND/HISTORY OF BOARD ACTIONS:

NA

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

Your Board could choose not to approve the MOU which would reduce local access to expanded lab capacity.

OTHER AGENCY INVOLVEMENT:

Northern Inyo Hospital, Southern Inyo Hospital, and potentially other healthcare facilities in Inyo County

FINANCING:

We will be responsible for the expenses for the collection of the specimens (scheduling and staff time). These costs would be paid out of the Health budget (045100) using COVID funding that is available.

ATTACHMENTS:

1. VBL-MOU-11-23-2020

APPROVALS:

Rhiannon Baker	Created/Initiated - 12/16/2020
Darcy Ellis	Approved - 12/16/2020
Anna Scott	Approved - 12/16/2020
Melissa Best-Baker	Approved - 12/16/2020
Marilyn Mann	Approved - 12/17/2020
Marshall Rudolph	Approved - 12/17/2020
Amy Shepherd	Approved - 12/17/2020
Marilyn Mann	Final Approval - 12/17/2020

Memorandum of Understanding
Of guidelines for local entities and community groups who would like to send collected samples to the CDPH Valencia Branch Laboratory for COVID-19 testing

Recitals

- A. WHEREAS, California is facing a pandemic arising from the spread of the novel coronavirus (COVID-19), including an anticipated surge in the number of people in California who are infected and have COVID-19 (the "Pandemic");

- B. WHEREAS, in response to the Pandemic, the Governor issued a Proclamation of State of Emergency dated March 4, 2020 and Executive Order (EO) N-25-20 dated March 12, 2020, and subsequent Executive Orders (collectively, and as may be further expanded from time to time, the "Emergency Declaration and Executive Order"), and the State Public Health Officer has issued State Public Health Officer Orders;

- C. WHEREAS, all agencies of the state government are required to perform any and all activities consistent with the direction of the State, pursuant to the Emergency Declaration and Executive Order;

- D. WHEREAS, the California Department of Public Health (CDPH) has determined that the capacity to test and the wait time for results has been significantly affected due to supply chain issues;

- E. WHEREAS, The CDPH Testing Taskforce has determined that increased testing and results response time is key to combating COVID;

- F. WHEREAS, the State of California, through CDPH Agreement 20-10586, has contracted with PerkinElmer in order to expand the State's capacity to respond to the Pandemic by providing laboratory equipment, software, and supplies necessary to increase capacity for laboratory testing of SARS-CoV-2, all equipment utilized for this agreement is proprietary;

- G. WHEREAS, PerkinElmer, has contracted with Color to provide a software platform in order to help enable individuals to access SARS-CoV-2 testing and provide local entities and community groups and easy to use system for managing the data associated with sample collection, including registration, intake, and results reporting, and such software platform utilized for this agreement is proprietary;

- H. WHEREAS, CDPH's Valencia Branch Laboratory has been created to provide essential laboratory testing of specimens for SARS-CoV-2, and the State has contracted with PerkinElmer to run those tests at CDPH's Valencia Branch Laboratory;

- I. WHEREAS, the State of California through CDPH Agreement 20-10727 has contracted with Color in order to expand the State's capacity to respond to the Pandemic by providing sample collection kits and shipping materials to help increase capacity for sample collection for SARS-CoV-2 in sites throughout the State;

J. WHEREAS, local entities and community groups who would like to send collected samples to the CDPH's Valencia Branch Laboratory for SARS-CoV-2 testing may do so upon agreeing to comply with the terms, conditions and requirements set forth in this Memorandum of Understanding.

K. WHEREAS, the local entity or community group signing below as Provider (Provider) desires to send collected samples to the CDPH's Valencia Branch Laboratory for SARS-CoV-2 testing and hereby enters into this Memorandum of Understanding to agree to comply with the terms, conditions and requirements set forth herein.

1. Term

A. The term of the Agreement shall be from the date of execution (the "Effective Date") until thirty (30) days after the lifting of the declaration of the COVID-19 state of emergency.

2. Service Overview

The Provider shall comply with the scope, the terms, conditions and requirements set forth herein for the laboratory testing of samples by the CDPH's Valencia Branch Laboratory for SARS-CoV-2, and with the requirements and system developed by PerkinElmer, either itself or through its subcontractors, for participant registration, specimen labelling, packaging, handling and transportation, and results return, incorporated herein.

3. Service Location

The services shall be performed at CDPH's Valencia Branch Laboratory located at 28454 Livingston Avenue, Valencia, CA 91355.

4. Project Representatives

A. The project representatives during the term of this agreement will be:

California Department of Public Health Sabel Davis Telephone: 916-865-8717 E-mail: sabel.davis@cdph.ca.gov	Provider: Manager name: Telephone: Fax: E-mail:
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B. Direct all inquiries to:

<p>California Department of Public Health Testing Task Force Attention: Sabel Davis Telephone: 916-865-8717 E-mail: testing.taskforce@state.ca.gov</p>	<p>Provider name: Section/Unit name: Attention: Street address: Telephone: Fax: Email:</p>
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5. Services to be Performed by CDPH’s Valencia Branch Laboratory

A. Laboratory testing of samples for SARS-CoV-2.

CDPH’s Valencia laboratory shall perform laboratory testing of collected samples for SARS-CoV-2 using equipment and supplies provided by PerkinElmer on behalf of CDPH. PerkinElmer will operate the laboratory equipment to perform the testing for SARS-CoV-2 including, but not limited to, extraction of nucleic acids from samples, preparation of samples for reverse transcriptase polymerase chain reaction (RT-PCR), and running samples on a PCR machine to detect the presence of SARS-CoV-2.

Samples will be tested only for SARS-CoV-2, unless an Emergency Use Authorization is granted for a Flu pack including SARS-CoV-2, Influenza A, Influenza B, and RSV.

B. Management of participant registration data and delivery of test results

CDPH, via Color as its contractor under CDPH Contract 20-10727, will provide sample collection kits and shipping materials necessary for collecting samples at each testing site and shipping them to the laboratory based on requests made by the Provider and approved by CDPH.

PerkinElmer, via Color as its contractor, shall provide software to each Provider for participant registration, intake, and association of the participant file with the specimen on behalf of PerkinElmer and CDPH. PerkinElmer, via Color as its contractor, will provide each Provider user of the software with training materials and access to support for troubleshooting.

PerkinElmer, via Color as its contractor, agrees to notify patients that test results are available through SMS and/or email message, within 48 hours after the specimen to be tested is received at CDPH’s Valencia Branch Laboratory.

PerkinElmer, via Color as its contractor, agrees to report test results to CDPH pursuant to 17 CCR 2505 within 48 hours after the specimen to be tested is received at CDPH's Valencia Branch Laboratory.

C. Records

1. Provider must provide PE and CDPH with the relevant medical records and laboratory records of any and all samples sent to CDPH's Valencia laboratory for testing, and PE must maintain the records in accordance with CLIA and state lab laws.

6. **Payment and Billing**

Unless otherwise agreed to in writing, CDPH will be responsible for the costs for laboratory testing of collected samples at the Valencia Branch Laboratory, and the parties will otherwise bear their own costs in providing services under this MOU. Nothing under this MOU precludes either party from seeking payment from health plans, insurers or other third-party payers ("Third Party Payers") for services rendered. It is the expectation of CDPH that Providers will not balance bill patients for amounts billed to but not paid by Third Party Payers.

The State intends to cover the costs of, and seek reimbursement for, all costs of lab processing at the Valencia Branch Laboratory. The parties will bear their own costs in providing services under this MOU, unless otherwise agreed to in writing. Nothing under this MOU precludes either party from seeking payment from health plans, insurers or other third-party payers ("Third Party Payers") for services rendered. It is the expectation of CDPH that Providers will not balance bill patients for amounts billed to but not paid by Third Party Payers.

7. **Provider's agreement and obligations to label, handle, package and provide transportation of the samples in compliance with PerkinElmer specifications**

Providers agree to follow all requirements and instructions for collection, labelling, handling, packaging and transportation of the specimens (i.e., type of swabs, tubes, etc.) by Provider to CDPH's Valencia Branch Laboratory as provided by PerkinElmer, CDPH or Color.

8. **Indemnification**

Provider agrees to indemnify, defend and save harmless the State, PerkinElmer, Color, and their respective officers, agents and employees from any and all claims and losses accruing or resulting to any and all contractors, subcontractors, suppliers, laborers, and any other person, firm or corporation furnishing or supplying work services, materials, equipment, or supplies in connection with the performance of this Agreement, and from any and all claims and losses accruing or resulting to any person, firm or corporation who may be injured or damaged by Provider in the performance of this Agreement.

9. Confidentiality of Information:

- A. The Provider and its employees, agents, or subcontractors shall protect from unauthorized access, use, or disclosure names and other personally identifying information and/or protected health information concerning persons either receiving services pursuant to this Agreement or persons whose names or identifying information become available or are disclosed to the Provider, its employees, agents, or subcontractors as a result of services performed under this Agreement, except as required or permitted by state or federal law.
- B. For purposes of this provision, identity shall include, but not be limited to name, identifying number, symbol, or other identifying particular assigned to the individual, such as finger or voice print or a photograph.
- C. As deemed applicable by CDPH, this provision may be supplemented by additional terms and conditions covering protected health information (PHI) or personal, sensitive, and/or confidential information (PSCI). Said terms and conditions will be outlined in one or more exhibits that will either be attached to this Agreement or incorporated into this Agreement by reference.

10. Avoidance of Conflict of Interest by Provider:

- A. CDPH intends to avoid any real or apparent conflict of interest on the part of the Provider, subcontracts, or employees, officers and directors of the Provider or subcontractors. Thus, CDPH reserves the right to determine, at its sole discretion, whether any information, assertion or claim received from any source indicates the existence of a real or apparent conflict of interest; and, if a conflict is found to exist, to require the Provider to submit additional information or a plan for resolving the conflict, subject to CDPH review and prior approval.
- B. Conflicts of interest include, but are not limited to:
 - 1. An instance where the Provider or any of its subcontractors, or any employee, officer, or director of the Provider or subcontractor has an interest, financial or otherwise, whereby the use or disclosure of information obtained while performing services under this Agreement would allow for private or personal benefit or for any purpose that is contrary to the goals and objectives of this Agreement.
 - 2. An instance where the Provider's or any subcontractor's employees, officers, or directors use their positions for purposes that are, or give the appearance of being, motivated by a desire for private gain for themselves or others, such as those with whom they have family, business or other ties.
- C. If CDPH is or becomes aware of a known or suspected conflict of interest, the Provider will be given an opportunity to submit additional information or to resolve the conflict. A Provider with a suspected conflict of interest will have five (5) working days from the date of notification of the conflict by CDPH to provide complete information regarding the suspected conflict. If a conflict of interest is determined to exist by CDPH and cannot be resolved to the satisfaction of CDPH, the conflict will be grounds for terminating this Agreement. CDPH may, at its discretion upon receipt of a written request from the Provider, authorize an extension of the timeline indicated herein.

11. Intellectual Property

CDPH, PerkinElmer, and Color retain all right, title and interest in and to their respective proprietary technology, processes, procedures and tools used to perform the services under this Agreement, and all intellectual property rights therein, including but not limited to all modifications, enhancements, improvements and derivative works thereto (collectively, the "IP"). No title to or ownership of the IP are transferred to the Provider in connection with this Agreement.

12. Dispute Resolution

Any dispute concerning a question of fact arising under the terms of this Agreement that is not disposed of within fifteen (15) calendar days by the Provider and State employees normally responsible for the administration of this Agreement shall be brought to the attention of the designated representative for the Provider and the Deputy Director CDPH (or designated representative) for joint resolution.

13. Execution

This Memorandum of Understanding may be executed in counterparts with the same force and effectiveness as though executed in a single document. The parties agree that an electronic copy of a signed agreement, or an electronically signed agreement, has the same force and legal effect as an agreement executed with an original ink signature. The term "electronic copy of a signed agreement" refers to a transmission by facsimile, electronic mail, or other electronic means of a copy of an original signed agreement in a portable document format. The term "electronically signed agreement" means an agreement that is executed by applying an electronic signature using technology approved by the State.

In witness whereof, this memorandum of understanding has been executed by the parties hereto:

California Department of Public Health

By:

Print name: Sabel Davis

Title: _____

Date:

Provider

Print Provider's full legal name:

By:

Title:

Date:



County of Inyo



Health & Human Services - Social Services

CONSENT - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Rhiannon Baker

SUBJECT: Agreement between Inyo County and eExemplar Human Services

RECOMMENDED ACTION:

Request Board: A) declare eExemplar Human Services of Reno, NV a sole-source provider of customized Social Service reporting tools and services; B) approve the agreement between the County of Inyo and eExemplar Human Services of Reno, NV for the provision of customized Social Service reporting tools and services in an amount not to exceed \$120,000.00 for the period of February 1, 2021 to January 31, 2023, contingent upon the Board's approval of future budgets, and authorize the Chairperson to sign, contingent upon all appropriate signatures being obtained.

SUMMARY/JUSTIFICATION:

The Inyo County Health and Human Services, Social Services Division is responsible for administering CalWORKs, Welfare-to-Work (WTW), CalFresh, Medi-Cal, Child Care, Foster Care, and IHSS programs. In an effort to meet mandated performance standards, we must have a reliable system to effectively monitor various caseload activities related to administration of the programs and manage workload activities and productivity.

eExemplar Human Services specializes in providing analytical services to public assistance, WTW, and human services agencies to monitor and analyze key elements of client engagement and performance, eligibility caseload activities, and the design of performance management enhancement recommendations for integrating data trend analysis into regular agency performance management processes.

The reports received from eExemplar will provide us with the necessary tools to enhance overall performance in order to meet mandated program requirements and improve service delivery and accuracy of benefits provided to eligible residents of Inyo County. The reports provide work lists for specific categories, caseload activities, and statistics that show key ratios related to specific operations at all levels of the organization. This information allows executive staff, managers, supervisors, and line staff to monitor performance and manage daily caseload activities.

Inyo County HHS is requesting a sole-source contract as eExemplar is the only vendor currently providing these analytical services for public assistance and human services agencies through a proprietary software program. eExemplar is currently contracted with 11 other counties to provide performance management design and analytical services and is compatible with California's Statewide Automated Welfare System (CalSAWS) used by the state, ensuring consistency of the performance outcome data Inyo County must track and report to the state.

HHS received notification in November 2020 that we are receiving CalSAWS funding that will cover these

expenses for the next two years, at which time an updated CalSAWS system will be implemented. At that time, the report functionality of the new system will be assessed to determine the continued need for this type of interface reporting option.

BACKGROUND/HISTORY OF BOARD ACTIONS:

NA

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

Your Board could choose to deny this request resulting in our inability to access the robust analytical reports needed to effectively monitor performance and outcomes regarding eligibility and other program mandates, which we are unable to generate independently from the individual program systems.

OTHER AGENCY INVOLVEMENT:

None

FINANCING:

CalSAWS consortium funding. This expense will be paid out of the Social Services budget (055800) Professional Services (5265) object code.

ATTACHMENTS:

1. Exemplar Contract

APPROVALS:

Rhiannon Baker	Created/Initiated - 12/16/2020
Darcy Ellis	Approved - 12/16/2020
Melissa Best-Baker	Approved - 12/16/2020
Marilyn Mann	Approved - 12/17/2020
Marshall Rudolph	Approved - 12/17/2020
Amy Shepherd	Approved - 12/18/2020
Marilyn Mann	Final Approval - 12/21/2020

AGREEMENT BETWEEN COUNTY OF INYO

AND _____
FOR THE PROVISION OF _____ SERVICES

INTRODUCTION

WHEREAS, the County of Inyo (hereinafter referred to as "County") may have the need for the _____ services of _____ of _____ (hereinafter referred to as "Contractor"), and in consideration of the mutual promises, covenants, terms, and conditions hereinafter contained, the parties hereby agree as follows:

TERMS AND CONDITIONS

1. SCOPE OF WORK.

The Contractor shall furnish to the County, upon its request, those services and work set forth in Attachment A, attached hereto and by reference incorporated herein. Requests by the County to the Contractor to perform under this Agreement will be made by _____, whose title is: _____. Requests to the Contractor for work or services to be performed under this Agreement will be based upon the County's need for such services. The County makes no guarantee or warranty, of any nature, that any minimum level or amount of services or work will be requested of the Contractor by the County under this Agreement. County by this Agreement incurs no obligation or requirement to request from Contractor the performance of any services or work at all, even if County should have some need for such services or work during the term of this Agreement.

Services and work provided by the Contractor at the County's request under this Agreement will be performed in a manner consistent with the requirements and standards established by applicable federal, state, and County laws, ordinances, regulations, and resolutions. Such laws, ordinances, regulations, and resolutions include, but are not limited to, those which are referred to in this Agreement.

2. TERM.

The term of this Agreement shall be from _____ to _____ unless sooner terminated as provided below.

3. CONSIDERATION.

A. Compensation. County shall pay to Contractor in accordance with the Schedule of Fees (set forth as Attachment B) for the services and work described in Attachment A which are performed by Contractor at the County's request.

B. Travel and per diem. Contractor will not be paid or reimbursed for travel expenses or per diem which Contractor incurs in providing services and work requested by County under this Agreement.

C. No additional consideration. Except as expressly provided in this Agreement, Contractor shall not be entitled to, nor receive, from County, any additional consideration, compensation, salary, wages, or other type of remuneration for services rendered under this Agreement. Specifically, Contractor shall not be entitled, by virtue of this Agreement, to consideration in the form of overtime, health insurance benefits, retirement benefits, disability retirement benefits, sick leave, vacation time, paid holidays, or other paid leaves of absence of any type or kind whatsoever.

D. Limit upon amount payable under Agreement. The total sum of all payments made by the County to Contractor for services and work performed under this Agreement shall not exceed _____ Dollars

(\$ _____) (hereinafter referred to as "contract limit"). County expressly reserves the right to deny any payment or reimbursement requested by Contractor for services or work performed which is in excess of the contract limit.

E. Billing and payment. Contractor shall submit to the County, once a month, an itemized statement of all services and work described in Attachment A, which were done at the County's request. This statement will be submitted to the County not later than the fifth (5th) day of the month. The statement to be submitted will cover the period from the first (1st) day of the preceding month through and including the last day of the preceding month. This statement will identify the date on which the services and work were performed and describe the nature of the services and work which were performed on each day. Upon timely receipt of the statement by the fifth (5th) day of the month, County shall make payment to Contractor on the last day of the month.

F. Federal and State taxes.

(1) Except as provided in subparagraph (2) below, County will not withhold any federal or state income taxes or social security from any payments made by County to Contractor under the terms and conditions of this Agreement.

(2) County will withhold California State income taxes from payments made under this Agreement to non-California resident independent contractors when it is anticipated that total annual payments to Contractor under this Agreement will exceed one thousand four hundred ninety nine dollars (\$1,499.00).

(3) Except as set forth above, County has no obligation to withhold any taxes or payments from sums paid by County to Contractor under this Agreement. Payment of all taxes and other assessments on such sums is the sole responsibility of Contractor. County has no responsibility or liability for payment of Contractor's taxes or assessments.

(4) The total amounts paid by County to Contractor, and taxes withheld from payments to non-California residents, if any, will be reported annually to the Internal Revenue Service and the California State Franchise Tax Board. To facilitate this reporting, Contractor shall complete and submit to the County an Internal Revenue Service (IRS) Form W-9 upon executing this Agreement.

4. WORK SCHEDULE.

Contractor's obligation is to perform, in a timely manner, those services and work identified in Attachment A which are requested by the County. It is understood by Contractor that the performance of these services and work will require a varied schedule. Contractor will arrange his/her own schedule, but will coordinate with County to ensure that all services and work requested by County under this Agreement will be performed within the time frame set forth by County.

5. REQUIRED LICENSES, CERTIFICATES, AND PERMITS.

A. Any licenses, certificates, or permits required by the federal, state, county, municipal governments, for contractor to provide the services and work described in Attachment A must be procured by Contractor and be valid at the time Contractor enters into this Agreement or as otherwise may be required. Further, during the term of this Agreement, Contractor must maintain such licenses, certificates, and permits in full force and effect. Licenses, certificates, and permits may include, but are not limited to, driver's licenses, professional licenses or certificates, and business licenses. Such licenses, certificates, and permits will be procured and maintained in force by Contractor at no expense to the County. Contractor will provide County, upon execution of this Agreement, with evidence of current and valid licenses, certificates and permits which are required to perform the services identified in Attachment A. Where there is a dispute between Contractor and County as to what licenses, certificates, and permits are required to perform the services identified in Attachment A, County reserves the right to make such determinations for purposes of this Agreement.

B. Contractor warrants that it is not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in covered transactions by any federal department or agency. Contractor also warrants that it is not suspended or debarred from receiving federal funds as listed in the List of Parties Excluded from Federal Procurement or Non-procurement Programs issued by the General Services Administration available at: <http://www.sam.gov>.

6. OFFICE SPACE, SUPPLIES, EQUIPMENT, ET CETERA.

Contractor shall provide such office space, supplies, equipment, vehicles, reference materials, and telephone service as is necessary for Contractor to provide the services identified in Attachment A to this Agreement. County is not obligated to reimburse or pay Contractor, for any expense or cost incurred by Contractor in procuring or maintaining such items. Responsibility for the costs and expenses incurred by Contractor in providing and maintaining such items is the sole responsibility and obligation of Contractor.

7. COUNTY PROPERTY.

A. Personal Property of County. Any personal property such as, but not limited to, protective or safety devices, badges, identification cards, keys, etc. provided to Contractor by County pursuant to this Agreement are, and at the termination of this Agreement remain, the sole and exclusive property of County. Contractor will use reasonable care to protect, safeguard and maintain such items while they are in Contractor's possession. Contractor will be financially responsible for any loss or damage to such items, partial or total, which is the result of Contractor's negligence.

B. Products of Contractor's Work and Services. Any and all compositions, publications, plans, designs, specifications, blueprints, maps, formulas, processes, photographs, slides, video tapes, computer programs, computer disks, computer tapes, memory chips, soundtracks, audio recordings, films, audio-visual presentations, exhibits, reports, studies, works of art, inventions, patents, trademarks, copyrights, or intellectual properties of any kind which are created, produced, assembled, compiled by, or are the result, product, or manifestation of, Contractor's services or work under this Agreement are, and at the termination of this Agreement remain, the sole and exclusive property of the County. At the termination of the Agreement, Contractor will convey possession and title to all such properties to County.

8. INSURANCE.

For the duration of this Agreement Contractor shall procure and maintain insurance of the scope and amount specified in Attachment C and with the provisions specified in that attachment.

9. STATUS OF CONTRACTOR.

All acts of Contractor, its agents, officers, and employees, relating to the performance of this Agreement, shall be performed as independent contractors, and not as agents, officers, or employees of County. Contractor, by virtue of this Agreement, has no authority to bind or incur any obligation on behalf of County. Except as expressly provided in Attachment A, Contractor has no authority or responsibility to exercise any rights or power vested in the County. No agent, officer, or employee of the Contractor is to be considered an employee of County. It is understood by both Contractor and County that this Agreement shall not under any circumstances be construed or considered to create an employer-employee relationship or a joint venture. As an independent contractor:

A. Contractor shall determine the method, details, and means of performing the work and services to be provided by Contractor under this Agreement.

B. Contractor shall be responsible to County only for the requirements and results specified in this Agreement, and except as expressly provided in this Agreement, shall not be subjected to County's control with respect to the physical action or activities of Contractor in fulfillment of this Agreement.

C. Contractor, its agents, officers, and employees are, and at all times during the term of this Agreement shall, represent and conduct themselves as independent contractors, and not as employees of County.

10. DEFENSE AND INDEMNIFICATION.

Contractor shall hold harmless, defend and indemnify County and its officers, officials, employees and volunteers from and against any and all liability, loss, damage, expense, costs (including without limitation costs and fees of litigation) of every nature arising out of or in connection with Contractor's performance of work hereunder or its failure to comply with any of its obligations contained in the agreement, except such loss or damages which was caused by the sole negligence or willful misconduct of the County.

11. RECORDS AND AUDIT.

A. Records. Contractor shall prepare and maintain all records required by the various provisions of this Agreement, federal, state, county, municipal, ordinances, regulations, and directions. Contractor shall maintain these records for a minimum of four (4) years from the termination or completion of this Agreement. Contractor may fulfill its obligation to maintain records as required by this paragraph by substitute photographs, microphotographs, or other authentic reproduction of such records.

B. Inspections and Audits. Any authorized representative of County shall have access to any books, documents, papers, records, including, but not limited to, financial records of Contractor, which County determines to be pertinent to this Agreement, for the purposes of making audit, evaluation, examination, excerpts, and transcripts during the period such records are to be maintained by Contractor. Further, County has the right, at all reasonable times, to audit, inspect, or otherwise evaluate the work performed or being performed under this Agreement.

12. NONDISCRIMINATION.

During the performance of this Agreement, Contractor, its agents, officers, and employees shall not unlawfully discriminate in violation of any federal, state, or local law, against any employee, or applicant for employment, or person receiving services under this Agreement, because of race, religion, color, national origin, ancestry, physical handicap, medical condition, marital status, age, or sex. Contractor and its agents, officers, and employees shall comply with the provisions of the Fair Employment and Housing Act (Government Code section 12900, et seq.), and the applicable regulations promulgated thereunder in the California Code of Regulations. Contractor shall also abide by the Federal Civil Rights Act of 1964 (P.L. 88-352) and all amendments thereto, and all administrative rules and regulations issued pursuant to said act.

13. CANCELLATION.

This Agreement may be canceled by County without cause, and at will, for any reason by giving to Contractor thirty (30) days written notice of such intent to cancel. Contractor may cancel this Agreement without cause, and at will, for any reason whatsoever by giving thirty (30) days written notice of such intent to cancel to County.

14. ASSIGNMENT.

This is an agreement for the services of Contractor. County has relied upon the skills, knowledge, experience, and training of Contractor as an inducement to enter into this Agreement. Contractor shall not assign or subcontract this Agreement, or any part of it, without the express written consent of County. Further, Contractor shall not assign any monies due or to become due under this Agreement without the prior written consent of County.

15. DEFAULT.

If the Contractor abandons the work, or fails to proceed with the work and services requested by County in a timely manner, or fails in any way as required to conduct the work and services as required by County, County may declare the Contractor in default and terminate this Agreement upon five (5) days written notice to Contractor. Upon such termination by default, County will pay to Contractor all amounts owing to Contractor for services and work satisfactorily performed to the date of termination.

16. WAIVER OF DEFAULT.

Waiver of any default by either party to this Agreement shall not be deemed to be waiver of any subsequent default. Waiver or breach of any provision of this Agreement shall not be deemed to be a waiver of any other or subsequent breach, and shall not be construed to be a modification of the terms of this Agreement unless this Agreement is modified as provided in paragraph twenty-two (22) below.

17. CONFIDENTIALITY.

Contractor further agrees to comply with the various provisions of the federal, state, and county laws, regulations, and ordinances providing that information and records kept, maintained, or accessible by Contractor in the course of providing services and work under this Agreement, shall be privileged, restricted, or confidential. Contractor agrees to keep confidential all such information and records. Disclosure of such confidential, privileged, or protected information shall be made by Contractor only with the express written consent of the County. Any disclosure of confidential information by Contractor without the County's written consent is solely and exclusively the legal responsibility of Contractor in all respects.

Notwithstanding anything in the Agreement to the contrary, names of persons receiving public social services are confidential and are to be protected from unauthorized disclosure in accordance with Title 45, Code of Federal Regulations Section 205.50, the Health Insurance Portability and Accountability Act of 1996, and Sections 10850 and 14100.2 of the Welfare and Institutions Code, and regulations adopted pursuant thereto. For the purpose of this Agreement, all information, records, and data elements pertaining to beneficiaries shall be protected by the provider from unauthorized disclosure.

18. CONFLICTS.

Contractor agrees that it has no interest, and shall not acquire any interest, direct or indirect, which would conflict in any manner or degree with the performance of the work and services under this Agreement.

19. POST AGREEMENT COVENANT.

Contractor agrees not to use any confidential, protected, or privileged information which is gained from the County in the course of providing services and work under this Agreement, for any personal benefit, gain, or enhancement. Further, Contractor agrees for a period of two years after the termination of this Agreement, not to seek or accept any employment with any entity, association, corporation, or person who, during the term of this Agreement, has had an adverse or conflicting interest with the County, or who has been an adverse party in litigation with the County, and concerning such, Contractor by virtue of this Agreement has gained access to the County's confidential, privileged, protected, or proprietary information.

20. SEVERABILITY.

If any portion of this Agreement or application thereof to any person or circumstance shall be declared invalid by a court of competent jurisdiction, or if it is found in contravention of any federal, state, or county statute, ordinance, or regulation, the remaining provisions of this Agreement, or the application thereof, shall not be invalidated thereby, and shall remain in full force and effect to the extent that the provisions of this Agreement are severable.

21. FUNDING LIMITATION.

The ability of County to enter this Agreement is based upon available funding from various sources. In the event that such funding fails, is reduced, or is modified, from one or more sources, County has the option to cancel, reduce, or modify this Agreement, or any of its terms within ten (10) days of its notifying Contractor of the cancellation, reduction, or modification of available funding. Any reduction or modification of this Agreement made pursuant to this provision must comply with the requirements of paragraph twenty-two (22) (Amendment).

22. AMENDMENT.

This Agreement may be modified, amended, changed, added to, or subtracted from, by the mutual consent of the parties hereto, if such amendment or change is in written form and executed with the same formalities as this Agreement, and attached to the original Agreement to maintain continuity.

23. NOTICE.

Any notice, communication, amendments, additions, or deletions to this Agreement, including change of address of either party during the terms of this Agreement, which Contractor or County shall be required, or may desire, to make, shall be in writing and may be personally served, or sent by prepaid first class mail to, the respective parties as follows:

County of Inyo

_____ Department
_____ Address
_____ City and State

Contractor:

_____ Name
_____ Address
_____ City and State

24. ENTIRE AGREEMENT.

This Agreement contains the entire agreement of the parties, and no representations, inducements, promises, or agreements otherwise between the parties not embodied herein or incorporated herein by reference, shall be of any force or effect. Further, no term or provision hereof may be changed, waived, discharged, or terminated, unless the same be in writing executed by the parties hereto.

////

////

AGREEMENT BETWEEN COUNTY OF INYO

AND _____

FOR THE PROVISION OF _____ SERVICES

IN WITNESS THEREOF, THE PARTIES HERETO HAVE SET THEIR HANDS AND SEALS
THIS _____ DAY OF _____, _____.

COUNTY OF INYO

CONTRACTOR

By: _____
Signature

By: _____
Signature

Print or Type Name

Print or Type Name

Dated: _____

Dated: _____

APPROVED AS TO FORM AND LEGALITY:

County Counsel

APPROVED AS TO ACCOUNTING FORM:

County Auditor

APPROVED AS TO PERSONNEL REQUIREMENTS:

Personnel Services

APPROVED AS TO INSURANCE REQUIREMENTS:

County Risk Manager

ATTACHMENT A

AGREEMENT BETWEEN COUNTY OF INYO

AND _____
FOR THE PROVISION OF _____ SERVICES

TERM:

FROM: _____ TO: _____

SCOPE OF WORK:

SCOPE OF WORK, between
eXemplar Human Services and Inyo County Department of Health and Human Services, for
Reporting Tools and Services
February 1, 2021 – January 31, 2023

This scope of work defines the services to be provided by eXemplar Human Services (Contractor) to the Inyo County Department of Health and Human Services (County) for Reporting Tools and Services.

1. Produce a Daily Intake Dashboard Report. This report shall provide a consolidated view of all current pending CalWORKs (CW), CalFresh (CF), Medi-Cal (MC), and Expedited CalFresh (ECF) programs. The report shall contain the following alert indicators by worker, unit, office and region: a) Pending CW/CF/MC Applications Due Tomorrow, b) CW App Between 35-45 Days, c) CW App Over 45 Days, d) CW Total Pending, e) CF App Between 20-30 Days, f) CF App Over 30 Days, g) CF Total Pending, h) ECF Due Next Day, i) Overdue ECF, j) MC App Between 35-45 Days, k) MC App Over 45 Days, l) MC Total Pending.
2. Produce a Consolidated Eligibility Triggers Report. This report shall be a multiple tab consolidated report representing Eligibility related information regarding Intake, Continuing eligibility and caseload management tasks. The elements contained in the report shall be by worker, unit, office and region: SAR 7 Completion Rate, Overdue SAR 7's Previous Month, CW/CF RE Completion Rate, CW/CF RE Current Month, MC RE Current Month, MC RE Current Month Summary, Critical Tasks, and MAGI Overdue Review.

The SAR 7 Completion Rate report (tab) will provide SAR7 information for all CW, CF and CW/CF combination cases for the respective SAR 7 Submit Month. The report shall include the following indicators by worker, unit, office and region: Programs associated with each SAR7, Total SAR 7's Due, those in Received status, Sent status, Received status, Ready to Run status, Completed status, N/A status, Incomplete status, and the Completion Rate of those SAR7s received. The report will also identify: a) If the case has a task with task type of NHR set prior to the last completed SAR7/RE, and display "(NHR)" next to the case number and b) identify and display income amount/types for those CF cases with income that have a SAR 7 reports due.

The Overdue SAR 7 report (tab) will display any open SAR7s (not in 'Complete', 'Incomplete, or 'NA' status) from the prior submit month received in the current month.

The CW/CF RE Completion Rate report (tab) will provide RE information for all CW/CF cases with RE's due in the respective report month. The report shall include the following indicators by worker, unit, office and region: Total CW/CF RE's Due, those in Sent status, Received status, Ready to Run status, Completed status, N/A status, Incomplete status, and the Completion Rate of those REs received.

The CW/CF RE Current Month report (tab) provides information on CW and CF RE's by MAQ in Received and Ready to Run status for the respective RE report month. The report shall include the following indicators: MAQ, Case Number, Received On, Last Status Date, Last Status, and Scanned in District. The report will also identify if the case has a task with task type of NHR set prior to the last completed SAR7/RE, and if so, display "(NHR)" next to the case number.

SCOPE OF WORK, between
eXemplar Human Services and Inyo County Department of Health and Human Services, for
Reporting Tools and Services
February 1, 2021 – January 31, 2023

The MC RE Current Month report (tab) provides information by worker, unit, office and region on MC RE's in Received and Ready to Run status for the respective RE report month. Because the universe for all current month MC REs includes REs that are processed outside of Customer Reports (CR), Contractor shall include these on the report and identify these as 'RE DUE (NO CR)'. The report shall include the following indicators by worker, unit, office and region: MAQ, Case Number, Received On, Last Status Date, Last Status, and Scanned in District. The report will also identify each case that has a task with task type of NHR set prior to the last completed SAR7/RE, include "(NHR)" next to the Case number.

The MC RE Current Month Summary report provides summary information on MC RE's in Received and Ready to Run status for the respective RE report month for each region and county total. Because the universe for all current month MC REs includes REs that are processed outside of Customer Reports (CR), Contractor shall identify these as 'RE DUE (NO CR)'. The report shall include the following indicators: RE Due (No CR), Ready to Run, Received, Total of Received and RE Due (No CR).

The Critical Tasks report indicates the task type of any open task whose due date has passed or is one day out (up to 48 hours) in the future of the following types: Felons, Fraud, Aid Paid Pending, State Hearing, Sanction/Penalty, MC 355 Due, Contact Client, and for New Hire Report tasks if created after 5/1/17, (NHR only when associated with a SAR or RE in the respective report month). Also, if there are any open Change Reported tasks where description is C4Yourself, regardless of the end date, it will be included. The report shall include the following indicators: MAQ, Case Number, Task Type, Due Date, and Assign Date.

The MAGI Overdue Review identifies MAGI referrals that are in an 'In Process' status three or more days after receipt of the referral as indicated on the Referral Date on the MAGI Referral Detail page. The report shall include the following indicators by worker, unit, office and region: Received On, In Process Status Date, and Days in Process.

3. Produce a Productivity Report. This report shall be a multiple tab report that provides information on case actions completed by any Eligibility Worker staff. The tabs with corresponding information will be Yesterday, Week to Date, and Month to Date for the respective reporting month/timeframe. The report will be customized to identify completed case actions by how they were completed in C-IV, i.e. running EDBC, status updates, etc.

The report shall include the following indicators by worker, unit, office and region: SAR 7s Completed, SAR 7s put in Incomplete status, MC REs Completed, MC RE put in Incomplete status, CF REs Completed, CF REs put in Incomplete status, CW RE Completed, CW REs put in Incomplete status, CW/CF RE Completed, CW/CF RE Incomplete, Tasks with SAR 7/RE, Tasks without SAR 7/RE, MEDS Alerts associated with SAR 7/RE, and MEDS Alerts not associated with a SAR 7/RE.

SCOPE OF WORK, between
eXemplar Human Services and Inyo County Department of Health and Human Services, for
Reporting Tools and Services
February 1, 2021 – January 31, 2023

4. Produce an Overtime Productivity Report. This report shall provide information on case actions completed by any Eligibility Worker staff during a Saturday overtime session. The tab with this data will only appear on the regular Productivity Report on the Monday immediately following the Saturday overtime session. The report will be customized to identify completed case actions by how they were completed in C-IV, i.e. running EDBC, status updates, etc.

The report shall include the following indicators by worker, unit, office and region: SAR 7s Completed, SAR 7s put in Incomplete status, MC REs Completed, MC RE put in Incomplete status, CF REs Completed, CF REs put in Incomplete status, CW RE Completed, CW REs put in Incomplete status, CW/CF RE Completed, CW/CF RE Incomplete, Tasks with SAR 7/RE, Tasks without SAR 7/RE, MEDS Alerts associated with SAR 7/RE, and MEDS Alerts not associated with a SAR 7/RE.

5. Produce a Consolidated Welfare to Work (WtW) Alerts report. This report shall provide multiple reports (tabs), for use by county WtW staff, in a single consolidated report.

The WtW Alerts report (tab) shall provide information and alerts related to WtW caseload management. It shall include the following indicators by worker, unit, office and region: e2Lite, Unengaged, Non-Compliance Over 60 Days, Good Cause Over 30 Days, Activities without Service Arrangements, Activities with No (Null) Attendance, Activities Lingering in Referred Status, Activities Ending in 2 Weeks.

The Null Hours Carryover report (tab) shall identify cases by worker, unit, office and region that for the respective report month, have had no WtW attendance hours entered for activities from two months ago and prior.

The Attendance and Progress report (tab) shall provide information on the processing of WtW 733.4 forms by WtW staff. The report shall include the following indicators by worker, unit, office and region: Received, Reviewed + Completed, Reviewed + Completed Status Worker ID, and Reviewed Rate.

The School Attendance report (tab) shall provide information on the processing of WtW 735.2 forms by WtW staff. The report shall include the following indicators by worker, unit, office and region: Received, Reviewed + Completed, Reviewed + Completed Status Worker ID, and Reviewed Rate.

The Travel Claims Completion Rate report (tab) shall provide information on the processing of WtW 753A forms by WtW staff. The report shall include the following indicators by worker, unit, office and region : Claims Received, Claims Reviewed + Completed, Reviewed + Completed Status Worker ID, Claims Reviewed/Completed Rate.

SCOPE OF WORK, between
eXemplar Human Services and Inyo County Department of Health and Human Services, for
Reporting Tools and Services
February 1, 2021 – January 31, 2023

The Travel Claims Carryover report (tab) shall identify the 753A forms received in a prior month, from the respective report month, that have never been reviewed in any way (Reviewed, Incomplete, NA, Denied, Error).

The Travel Claims NA or Incomplete report (tab) shall identify by worker, unit, office and region 753A forms in the respective report month that have never been in a completed status and are currently in either NA or IN status.

The Child Care Alerts report (tab) shall provide alerts related to the Child Care program. The report shall include the following indicators by worker, unit, office and region: Child Care Applications Coming Due, Overdue Child Care Applications, IDT, Over 47 Months, Tasks Coming Due, Tasks Overdue, 12 Years + 11 Months and Older, and No Payments Issued in Last Three Periods.

The Child Care Reimbursement Completion Rate report (tab) shall provide, for the respective report month, information on the processing of CCRR 100 forms by WtW and Fiscal staff. The report shall include the following indicators by worker, unit, office and region : Received, Reviewed, Reviewed Status Worker ID, Reviewed Rate, Payment Issued, and Payment Issued Rate.

The Carryover-Received Not Reviewed report (tab) shall identify by worker, unit, office and region those CCRR 100 forms, from a month prior to the respective report month, that are in a Received status and have not been updated to a Reviewed status.

The Carryover-Reviewed, No Payment report (tab) shall identify by worker, unit, office and region those CCRR 100 forms, from a month prior to the respective report month, that are in a Reviewed status and have not had a payment issued.

6. Produce an Office Assistant Productivity Report. This report shall be a multiple tab report that provides information on clerical actions completed by Office Assistant staff. The tabs with corresponding information will be Yesterday, Week to Date, and Month to Date for the respective reporting month/timeframe. The report will be customized to identify completed clerical actions by how they were completed in C-IV, i.e. status updates.

The report shall include the following indicators by worker, unit, office and region: Apps Pended, REAC's Completed, EBT Cards Issued, Gas Cards Issued, Bus Passes Issued, Vouchers Issued, Travel Claims Processed, HA Payments Processed, and Diaper Issuances Processed.

7. Produce an Office Assistant Overtime Productivity Report. This report shall provide information on clerical actions completed by Office Assistant staff during a Saturday overtime session. The tab with this data will appear on the regular Office Assistant Productivity Report only on the Monday immediately following the Saturday overtime session. The report will be customized to identify completed case actions by how they were completed in C-IV, i.e. status updates.

SCOPE OF WORK, between
eXemplar Human Services and Inyo County Department of Health and Human Services, for
Reporting Tools and Services
February 1, 2021 – January 31, 2023

The report shall include the following indicators by worker, unit, office and region: Apps Pended, REAC's Completed, EBT Cards Issued, Gas Cards Issued, Bus Passes Issued, Vouchers Issued, Travel Claims Processed, HA Payments Processed, and Diaper Issuances Processed.

8. Produce a Foster Care Alerts Dashboard Report. This report shall provide alerts related to the Foster Care program. The report shall include the following indicators by worker, unit, office and region: Case Number, Foster Care Application Coming Due, Overdue Foster Care Application Determination, Task Coming Due, Tasks Overdue, MEDS Alert, Foster Care RE Due in Next Two Months, Foster Care RE Overdue, and SCR Ending within 30 Days.
9. Produce an IHSS Executive Dashboard with Trend Data and Visualizations.
10. Produce an IHSS Intake Report.
11. Produce an IHSS Active in Intake Report.
12. Produce IHSS Reassessment and IHSS Future Reassessment Reports.
13. Produce IHSS Productivity Reports with Yesterday, Week-to-Date and Month-to-Date data.
14. Produce an IHSS Caseload Report.
15. Produce an IHSS Disaster Report.
16. Produce an IHSS ICT Report.
17. Produce an IHSS ETS Report.

ATTACHMENT B

AGREEMENT BETWEEN COUNTY OF INYO

AND _____
FOR THE PROVISION OF _____ SERVICES

TERM:

FROM: _____ TO: _____

SCHEDULE OF FEES:

ATTACHMENT C

AGREEMENT BETWEEN COUNTY OF INYO

AND _____
FOR THE PROVISION OF _____ SERVICES

TERM:

FROM: _____ TO: _____

SEE ATTACHED INSURANCE PROVISIONS

Specifications 2

Insurance Requirements for Professional Services

Consultant shall procure and maintain for the duration of the contract insurance against claims for injuries to persons or damages to property which may arise from or in connection with the performance of the work hereunder by the Consultant, its agents, representatives, or employees.

MINIMUM SCOPE AND LIMIT OF INSURANCE

Coverage shall be at least as broad as:

1. **Commercial General Liability (CGL):** Insurance Services Office Form CG 00 01 covering CGL on an "occurrence" basis for bodily injury and property damage, including products-completed operations, personal injury and advertising injury, with limits no less than **\$1,000,000** per occurrence. If a general aggregate limit applies, either the general aggregate limit shall apply separately to this project/location or the general aggregate limit shall be twice the required occurrence limit.
2. **Automobile Liability:** Insurance Services Office Form Number CA 0001 covering, Code 1 (any auto), or if Consultant has no owned autos, Code 8 (hired) and 9 (non-owned), with limit no less than **\$500,000** per accident for bodily injury and property damage.
3. **Workers' Compensation** insurance as required by the State of California, with Statutory Limits, and Employer's Liability Insurance with limit of no less than **\$1,000,000** per accident for bodily injury or disease.

(Not required if consultant provides written verification it has no employees)

1. **Professional Liability (Errors and Omissions)** Insurance appropriate to the Consultant's profession, with limit no less than **\$1,000,000** per occurrence.

If the Consultant maintains higher limits than the minimums shown above, the Entity requires and shall be entitled to coverage for the higher limits maintained by the Consultant. Any available insurance proceeds in excess of the specified minimum limits of insurance and coverage shall be available to the Entity.

Other Insurance Provisions

The insurance policies are to contain, or be endorsed to contain, the following provisions:

Additional Insured Status

1. **The Entity, its officers, officials, employees, and volunteers are to be covered as additional insureds** on the CGL policy with respect to liability arising out of work or operations performed by or on behalf of the consultant including materials, parts, or equipment furnished in connection with such work or operations. General liability coverage can be provided in the form of an endorsement to the Consultant's insurance (at least as broad as ISO Form CG 20 10 11 85 or both CG 20 10 and CG 20 37 forms if later revisions used).

Other Insurance Provisions

The insurance policies are to contain, or be endorsed to contain, the following provisions:

Primary Coverage

For any claims related to this contract, the **Consultant's insurance coverage shall be primary** insurance as respects the Entity, its officers, officials, employees, and volunteers. Any insurance or self-insurance maintained by the Entity, its officers, officials, employees, or volunteers shall be excess of the Consultant's insurance and shall not contribute with it.

Notice of Cancellation

Each insurance policy required above shall state that **coverage shall not be canceled, except with notice to the Entity.**

Waiver of Subrogation

Consultant hereby grants to Entity a waiver of any right to subrogation which any insurer of said Consultant may acquire against the Entity by virtue of the payment of any loss under such insurance. Consultant agrees to obtain any endorsement that may be necessary to affect this waiver of subrogation, but this provision applies regardless of whether or not the Entity has received a waiver of subrogation endorsement from the insurer.

Deductibles and Self-Insured Retentions

Any deductibles or self-insured retentions must be declared to and approved by the Entity. The Entity may require the Consultant to provide proof of ability to pay losses and related investigations, claim administration, and defense expenses within the retention.

Acceptability of Insurers

Insurance is to be placed with insurers with a current A.M. Best's rating of no less than A:VII, unless otherwise acceptable to the Entity.

Claims Made Policies

If any of the required policies provide coverage on a claims-made basis:

1. The Retroactive Date must be shown and must be before the date of the contract or the beginning of contract work.
2. Insurance must be maintained and evidence of insurance must be provided **for at least five (5) years after completion of the contract of work.**
3. If coverage is canceled or non-renewed, and not **replaced with another claims-made policy form with a Retroactive Date** prior to the contract effective date, the Consultant must purchase "extended reporting" coverage for a minimum of **five (5) years** after completion of contract work.

Verification of Coverage

Consultant shall furnish the Entity with original certificates and amendatory endorsements or copies of the applicable policy language effecting coverage required by this clause. All certificates and endorsements are to be received and approved by the Entity before work commences. However, failure to obtain the required documents prior to the work beginning shall not waive the Consultant's obligation to provide them. The Entity reserves the right to require complete,

certified copies of all required insurance policies, including endorsements required by these specifications, at any time.

Subcontractors

Consultant shall require and verify that all subcontractors maintain insurance meeting all the requirements stated herein.

Special Risks or Circumstances

Entity reserves the right to modify these requirements, including limits, based on the nature of the risk, prior experience, insurer, coverage, or other special circumstances.



County of Inyo



Public Works

CONSENT - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Greg Waters

SUBJECT: Recording a Notice of Completion for the Annex HVAC Retrofit Project

RECOMMENDED ACTION:

Request Board approve Resolution No. 2021-01, titled, "A Resolution of the Board of Supervisors of the County of Inyo, State of California Authorizing the Recording of a Notice of Completion for the Annex HVAC Retrofit Project," and authorize the Chairperson to sign.

SUMMARY/JUSTIFICATION:

Bishop Heating and Air Conditioning, Inc. communicated to Inyo County personnel that they had completed the Annex HVAC Retrofit Project on November 20th, 2020. Etchemendy Engineering inspected and approved the installation on December 9th, 2020.

BACKGROUND/HISTORY OF BOARD ACTIONS:

The Annex Building in Independence was constructed in 1964 with an expected lifespan of thirty years. The original HVAC equipment is extremely unreliable due to its age. The Board approved a consultant contract with Etchemendy Engineering, Inc. of Reno, NV in April 2019. A new HVAC system was subsequently designed. The bid package for the IS Server room portion of the project was approved for advertisement in October 2019. One bid was received but it was substantially over budget. The decision was made to readvertise both portions of the project, the IS Server Room as well as the entire occupied space in order benefit from scales of economy. The entire project was approved for advertisement by the Board in March 2020. Bids for the entire HVAC project were received on April 1st, 2020 with Bishop Heating and Air Conditioning, Inc. as the sole bidder.

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

The Board could choose not to file the Notice of Completion, however this is not recommended as we could not pay the contractor the 5% retention.

OTHER AGENCY INVOLVEMENT:

FINANCING:

As part of the 2018-2019 approved Deferred Maintenance Budget, Code 5640, \$50,000 was budgeted for improvements to the HVAC system for the Annex IS Server Room. This was carried over to the 2019-2020 approved Deferred Maintenance Budget, an additional \$450,000 was appropriated within Code 5191 for

\$400,000 for the Main Annex System and within Code 5640 for \$50,000 for the Annex IS Server Room. The total of all appropriations for the construction of both systems is \$500,000.

Subsequently, on May 26th, 2020, the Fiscal Year 2019-2020 County Budget was amended by Board action as follows: Increase appropriation in Deferred Maintenance Budget #011501, Structures and Improvements Object Code #5640 by \$79,000 and reduce Deferred Maintenance Budget #011501 Fund Balance by \$79,000.

The contract was awarded to Bishop Heating and Air Conditioning, Inc. on May 26th, 2020.

ATTACHMENTS:

1. Annex HVAC Retrofit Project Resolution and Notice of Completion

APPROVALS:

Greg Waters	Created/Initiated - 12/14/2020
Darcy Ellis	Approved - 12/15/2020
Greg Waters	Approved - 12/22/2020
Breanne Nelums	Approved - 12/22/2020
Michael Errante	Approved - 12/22/2020
Sue Dishion	Approved - 12/28/2020
Marshall Rudolph	Approved - 12/28/2020
Amy Shepherd	Final Approval - 12/28/2020

RESOLUTION #2020 -

**“A RESOLUTION OF THE BOARD OF SUPERVISORS
OF THE
COUNTY OF INYO, STATE OF CALIFORNIA
AUTHORIZING THE RECORDING OF A NOTICE OF COMPLETION
FOR THE
Annex HVAC Retrofit Project”**

WHEREAS, Michael Errante, Director of the Public Works Department of the County of Inyo, has determined that the Annex HVAC Retrofit Project has been completed by Bishop Heating and Air Conditioning, Inc. in accordance with the Project Plans and Specifications.

NOW, THEREFORE, BE IT RESOLVED, that the Director of Public Works is hereby authorized and directed to sign and file with the County Recorder a separate Notice of Completion pertaining to the Annex HVAC Retrofit Project.

Passed, approved and adopted this _____ day of _____, 2020 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

Matt Kingsley, Chairperson, Board of Supervisors

ATTEST:

Clint Quilter, Clerk of the Board

by _____
Assistant Clerk of the Board

**RECORDING REQUESTED BY AND
WHEN RECORDED RETURN TO:**

**Inyo County Public Works Department
P. O. Drawer Q
Independence, CA 93515**

The area above this line is for Recorder's Use

NOTICE OF COMPLETION

NOTICE IS HEREBY GIVEN THAT:

1. A work of improvement known as the Annex HVAC Retrofit Project on the property hereinafter described was completed on November 20th, 2020 and was accepted by the Board of Supervisors, County of Inyo on January 5th, 2021.
2. The property on which the Annex HVAC Retrofit Project has been completed and is located at 168 N Edwards Street, in Independence, CA.
3. The County of Inyo, a political subdivision of the State of California, the address of which is 224 North Edwards Street, P.O. Drawer N, Independence, CA 93526, owns and maintains the Annex Building.
4. The undersigned, Michael Errante, is the Director of Public Works of the County of Inyo and has been duly authorized pursuant to Resolution adopted, by the Board of Supervisors of the County of Inyo to execute and file this Notice of Completion.
5. The name of the original contractor that constructed the Annex HVAC Retrofit Project, pursuant to contract with the County, is Bishop Heating and Air Conditioning, Inc.

Pursuant to the contract, the contractor was required to furnish all labor, materials, methods or processes, implements, tools, machinery, equipment, transportation services, and all other items and related functions which are necessary or appurtenant to construct the project designated in the contract.

COUNTY OF INYO

Dated:

By: _____
Michael Errante, Director of Public Works

VERIFICATION

STATE OF CALIFORNIA)
) SS.
COUNTY OF INYO)

I, Michael Errante, hereby declare: That I am the Director of Public Works for the County of Inyo, a political subdivision of the State of California, the public entity on behalf of which I executed the foregoing NOTICE OF COMPLETION for the Annex HVAC Retrofit Project, and which entity is the owner of the aforesaid interest or estate in the property therein described; that I am authorized by the public entity to execute this NOTICE on the entity's behalf; that I am authorized to and hereby make this verification on behalf of the public entity; and that I have read said NOTICE and know the contents thereof. I declare under penalty of perjury under the laws of the State of California that the NOTICE and the information set forth therein are true and correct.

Dated: _____

Michael Errante



County of Inyo



Public Works

CONSENT - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Jacob Trauscht

SUBJECT: Request for the Board to Award a contract to Spiess Construction Company to complete the construction of the North Round Valley Bridge Over Pine Creek Bridge Replacement Project

RECOMMENDED ACTION:

Request Board: A) award the contract for the North Round Valley Bridge Over Pine Creek Replacement Project to Spiess Construction Company of Santa Maria, CA as the successful bidder; B) approve the construction contract between the County of Inyo and Spiess Construction Company of Santa Maria, CA in the amount of \$3,334,502.55 and authorize the Chairperson to sign, contingent upon all appropriate signatures being obtained; and C) authorize the Public Works Director to execute all other project contract documents, including contract change orders, to the extent permitted by Public Contract Code Section 20142 and other applicable laws.

SUMMARY/JUSTIFICATION:

The North Round Valley Bridge over Pine Creek failed during the runoff of 2017. The final environmental permits were obtained in October 2020, with bidding occurring from November 5th through December 9, 2020. Four contractors bid on this project (as listed below), with Spiess Construction Company of Santa Maria, Ca are the apparent low bidder at \$3,334,502.55 (\$3,339,322.55 on Bid Tabulation). Note that 3 of the 4 Bid Tabulations had mathematical errors as indicated in the attached Bid Tabulation Documents.

Contractor	Bid Total (Reported)	Bid Total Calculated
Spiess Construction	\$3,339,332.55	\$3,334,502.55
MKD Construction	\$4,799,000.00	\$4,799,000.00
Granite Construction	\$3,989,829.00	\$3,939,669.00
Griffith Company	\$4,494,944.00	\$4,495,672.00

BACKGROUND/HISTORY OF BOARD ACTIONS:

This bridge washed out during the runoff of 2017 and received a California Office of Emergency Services grant (Reimbursement at 75% CalOES, 25% county) to replace the bridge. This project will replace the bridge with a wider, 85 foot long bridge, that will better accommodate future flows.

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

The board could choose not to award the contract, this is not recommended as all environmental permits are secured and this project is currently funded at 75% by the California Office of Emergency Services.

OTHER AGENCY INVOLVEMENT:

FINANCING:

The contract will be paid out of the Road Budget 034600 and object code 5717 North Round Valley Road.

This project is funded at 75% by the California Department of Emergency Services (CalOES) via reimbursement. The low bid was \$114,500 over the engineers estimate, and \$760,210 over the amount approved by CalOES in January of 2019. Public Works is submitting a request for additional funds to CalOES to cover the discrepancy between the approved funds and the actual contract cost, as described above.

If CalOES does not approve the additional funds, the Road Department will cover the additional costs from their fund balance. The Road fund balance as of 6/30/2020 was \$5,507,773 of which Fiscal Year 2020-2021 budget is anticipating using \$1,721,232 leaving \$3,786,541. If additional funding is not awarded for this contract , this will leave approximately a \$3 million fund balance in Road.

ATTACHMENTS:

1. Contractor Bid Tabs
2. Round Valley Bid Tabulation
3. Contract - North Round Valley Bridge - Spiess

APPROVALS:

Jacob Trauscht	Created/Initiated - 12/23/2020
Darcy Ellis	Approved - 12/23/2020
Breanne Nelums	Approved - 12/23/2020
Jacob Trauscht	Approved - 12/28/2020
Ashley Helms	Approved - 12/28/2020
Marshall Rudolph	Approved - 12/28/2020
Amy Shepherd	Approved - 12/30/2020
Michael Errante	Final Approval - 12/31/2020

BID ITEM LIST
NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT PROJECT

BIDDER'S COMPANY NAME: SPIESS CONSTRUCTION Co., Inc.

ABBREVIATIONS: LS = LUMP SUM SQFT = SQUARE FEET LF = LINEAR FEET
 CY = CUBIC YARD EA = EACH LB = POUND

ITEM NO.	DESCRIPTION	UNIT MEAS	EST. QUANTITY	UNIT PRICE	TOTAL DOLLARS
1	MOBILIZATION	LS	1	\$ 99,000.00 ^{99,000.00}	\$ 99,000.00 ^{99,000.00}
2	CONSTRUCTION SURVEYS	LS	1	\$ 25,000.00	\$ 25,000.00
3	TRAFFIC CONTROL SYSTEM	LS	1	\$ 3,000.00	\$ 3,000.00
4	JOB SITE MANAGEMENT	LS	1	\$ 110,000.00	\$ 110,000.00
5	PREPARE STORM WATER POLLUTION PREVENTION PLAN	LS	1	\$ 10,000.00	\$ 10,000.00
6	TEMPORARY CREEK DIVERSION SYSTEM	LS	1	\$ 135,000.00	\$ 135,000.00
7	REMOVE ASPHALT CONCRETE SURFACING	SQFT	7,470	\$ 3.00	\$ 22,410.00
8	TEMPORARY HIGH-VISIBILITY FENCE (TYPE ESA)	LF	1,330	\$ 10.00	\$ 13,300.00
9	CLEARING AND GRUBBING	LS	1	\$ 25,000.00	\$ 25,000.00
10	STRUCTURE EXCAVATION (BRIDGE)	CY	68	\$ 650.00	\$ 44,200.00
11	STRUCTURE EXCAVATION (TYPE D)	CY	640	\$ 225.00	\$ 144,000.00
12	STRUCTURE BACKFILL (BRIDGE)	CY	275	\$ 275.00	\$ 75,625.00
13	FIBER ROLL	LF	480	\$ 10.00	\$ 4,800.00
14	HYDROSEED	SQFT	2,800	\$ 1.00	\$ 2,800.00
15	HOT MIX ASPHALT (TYPE A)	TON	196	\$ 300.00	\$ 58,800.00
16	24" CAST-IN-DRILLED-HOLE CONCRETE PILING	LF	1432	\$ 470.00	\$ 673,040.00
17	STRUCTURAL CONCRETE, BRIDGE FOOTING	CY	86	\$ 2,000.00	\$ 172,000.00
18	STRUCTURAL CONCRETE, BRIDGE	CY	148	\$ 2,000.00	\$ 296,000.00
19	STRUCTURAL CONCRETE, BRIDGE (POLYMER FIBER)	CY	93	\$ 2,000.00	\$ 186,000.00
20	FURNISH PRECAST PRESTRESSED CONCRETE CA WF GIRDER	EA	4	\$ 58,000.00	\$ 232,000.00

ITEM NO.	DESCRIPTION	UNIT MEAS	EST. QUANTITY	UNIT PRICE	TOTAL DOLLARS
21	ERECT PRECAST PRESTRESSED CONCRETE CA WF GIRDER	EA	4	\$ 18,000. ⁰⁰	\$ 72,000. ⁰⁰
22	JOINT SEAL (Type B)	LF	77	\$ 200. ⁰⁰	\$ 15,400. ⁰⁰
23	BAR REINFORCING STEEL (BRIDGE)	LB	56,727	\$ 1.65	\$ 93,599.55
24	BAR REINFORCING STEEL (EPOXY COATED) (BRIDGE)	LB	22,800	\$ 3.65	\$ 83,220. ⁰⁰
25	BRIDGE REMOVAL	LS	1	\$ 130,000. ⁰⁰	\$ 130,000. ⁰⁰
26	ROCK SLOPE PROTECTION (150 LB, CLASS III, METHOD B)	CY	472	\$ 232. ⁰⁰	\$ 109,504. ⁰⁰
27	ROCK SLOPE PROTECTION (1/2 TON, CLASS VII, METHOD B)	CY	1,362	\$ 232. ⁰⁰	\$ 315,984. ⁰⁰
28	ROCK SLOPE PROTECTION FABRIC (CLASS 8)	SQYD	1,128	\$ 10. ⁰⁰	\$ 11,280. ⁰⁰
29	TRANSITION RAILING (TYPE WB-31)	EA	4	\$ 9,000. ⁰⁰	\$ 36,000. ⁰⁰
30	IN-LINE TERMINAL SYSTEM	EA	4	\$ 6,000. ⁰⁰	\$ 24,000. ⁰⁰
31	CALIFORNIA ST-75 BRIDGE RAIL	LF	241	\$ 375. ⁰⁰	\$ 90,375. ⁰⁰
32	REMOVE GUARDRAIL	LF	250	\$ 30. ⁰⁰	\$ 7,500. ⁰⁰
33	PAINT TRAFFIC STRIPE (2-COAT)	LF	353	\$ 5. ⁰⁰	\$ 1,765. ⁰⁰
34	EMBANKMENT	CY	70	\$ 85. ⁰⁰	\$ 5,950. ⁰⁰
35	IMPORTED BORROW	CY	70	\$ 85. ⁰⁰	\$ 5,950. ⁰⁰

TOTAL BID (IN NUMBERS) 3,339,322.55

TOTAL BID (IN WORDS) Three million Three hundred Thirty nine thousand three hundred twenty two and fifty five ~~00~~ cents

REVIEWED AND CHECKED BY: _____
(For County Use)



This bid was received on Dec. 9
20 22 @ 3:26
ATTEST: Clint Quilter, Administrative Officer
and Clerk of the Board Inyo County, California
By [Signature] Assistant

ADD. # 1

BID ITEM LIST
NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT PROJECT

BIDDER'S COMPANY NAME: Granite Construction Company
ABBREVIATIONS: LS = LUMP SUM SQFT = SQUARE FEET LF = LINEAR FEET
 CY = CUBIC YARD EA = EACH LB = POUND

ITEM NO.	DESCRIPTION	UNIT MEAS	EST. QUANTITY	UNIT PRICE	TOTAL DOLLARS
1	MOBILIZATION	LS	1	\$ 380000	\$ 380000
2	CONSTRUCTION SURVEYS	LS	1	\$ 35000	\$ 35000
3	TRAFFIC CONTROL SYSTEM	LS	1	\$ 20000	\$ 20000
4	JOB SITE MANAGEMENT	LS	1	\$ 12000	\$ 12000
5	PREPARE STORM WATER POLLUTION PREVENTION PLAN	LS	1	\$ 2000	\$ 2000
6	TEMPORARY CREEK DIVERSION SYSTEM	LS	1	\$ 456000	\$ 456000
7	REMOVE ASPHALT CONCRETE SURFACING	SQFT	7,470	\$ 1.00	\$ 7470
8	TEMPORARY HIGH-VISIBILITY FENCE (TYPE ESA)	LF	1,330	\$ 10-	\$ 13300
9	CLEARING AND GRUBBING	LS	1	\$ 40000.00	\$ 40000.00
10	STRUCTURE EXCAVATION (BRIDGE)	CY	68	\$ 150-	\$ 10200
11	STRUCTURE EXCAVATION (TYPE D)	CY	640	\$ 150-	\$ 96000
12	STRUCTURE BACKFILL (BRIDGE)	CY	275	\$ 400-	\$ 110000
13	FIBER ROLL	LF	480	\$ 9.00	\$ 4320
14	HYDROSEED	SQFT	2,800	\$ 2.00	\$ 5760
15	HOT MIX ASPHALT (TYPE A)	TON	196	\$ 400-	\$ 78400
16	24" CAST-IN-DRILLED-HOLE CONCRETE PILING	LF	1432	\$ 450-	\$ 644400
17	STRUCTURAL CONCRETE, BRIDGE FOOTING	CY	86	\$ 1500 1400	\$ 129000 120400
18	STRUCTURAL CONCRETE, BRIDGE	CY	148	\$ 3400	\$ 503200
19	STRUCTURAL CONCRETE, BRIDGE (POLYMER FIBER)	CY	93	\$ 4200	\$ 390600
20	FURNISH PRECAST PRESTRESSED CONCRETE CA WF GIRDER	EA	4	\$ 52000	\$ 208000

ITEM NO.	DESCRIPTION	UNIT MEAS	EST. QUANTITY	UNIT PRICE	TOTAL DOLLARS
21	ERECT PRECAST PRESTRESSED CONCRETE CA WF GIRDER	EA	4	\$ 22000	\$ 88000
22	JOINT SEAL (Type B)	LF	77	\$ 100-	\$ 7700
23	BAR REINFORCING STEEL (BRIDGE)	LB	56,727	\$ 1.60	\$ 90763.20
24	BAR REINFORCING STEEL (EPOXY COATED) (BRIDGE)	LB	22,800	\$ 3.80	\$ 86640
25	BRIDGE REMOVAL	LS	1	\$ 85000	\$ 85000
26	ROCK SLOPE PROTECTION (150 LB. CLASS III, METHOD B)	CY	472	\$ 130-	\$ 61360
27	ROCK SLOPE PROTECTION (1/2 TON, CLASS VII, METHOD B)	CY	1,362	\$ 130-	\$ 177060
28	ROCK SLOPE PROTECTION FABRIC (CLASS 8)	SQYD	1,128	\$ 5.00	\$ 5640
29	TRANSITION RAILING (TYPE WB-31)	EA	4	\$ 5000	\$ 20000
30	IN-LINE TERMINAL SYSTEM	EA	4	\$ 4800	\$ 19200
31	CALIFORNIA ST-75 BRIDGE RAIL	LF	241	\$ 550-	\$ 132550
32	REMOVE GUARDRAIL	LF	250	\$ 40-	\$ 10000
33	PAINT TRAFFIC STRIPE (2-COAT)	LF	353	\$ 15-	\$ 5295
34	EMBANKMENT	CY	70	\$ 70-	\$ 4900
35	IMPORTED BORROW	CY	70	\$ 1.00	\$ 70-

TOTAL BID (IN NUMBERS) \$ 3,939,829

TOTAL BID (IN WORDS) three million nine hundred thirty nine thousand eight hundred twenty nine dollars

REVIEWED AND CHECKED BY: _____

(For County Use)



This bid was received on Dec. 9
 2020 @ 3:26 p.m.
 ATTEST: Clint Quilter, Administrative Officer
 and Clerk of the Board Inyo County, California
 By [Signature] Assistant

BID ITEM LIST
NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT PROJECT

BIDDER'S COMPANY NAME: Griffith Company

ABBREVIATIONS: LS = LUMP SUM SQFT = SQUARE FEET LF = LINEAR FEET
 CY = CUBIC YARD EA = EACH LB = POUND

ITEM NO.	DESCRIPTION	UNIT MEAS	EST. QUANTITY	UNIT PRICE	TOTAL DOLLARS
1	MOBILIZATION	LS	1	440,000 \$ 726,562.84 W/W	440,000.00 \$ 726,562.84 W/W
2	CONSTRUCTION SURVEYS	LS	1	\$ 35,000.00	\$ 35,000.00
3	TRAFFIC CONTROL SYSTEM	LS	1	\$ 2,300.00	\$ 2,300.00
4	JOB SITE MANAGEMENT	LS	1	\$ 15,000.00	\$ 15,000.00
5	PREPARE STORM WATER POLLUTION PREVENTION PLAN	LS	1	\$ 2,000.00	\$ 2,000.00
6	TEMPORARY CREEK DIVERSION SYSTEM	LS	1	\$ 491,155.50	\$ 491,155.50
7	REMOVE ASPHALT CONCRETE SURFACING	SQFT	7,470	\$ 3.00	\$ 22,410.00
8	TEMPORARY HIGH-VISIBILITY FENCE (TYPE ESA)	LF	1,330	\$ 8.00	\$ 10,640.00
9	CLEARING AND GRUBBING	LS	1	\$ 600,000.00	\$ 600,000.00
10	STRUCTURE EXCAVATION (BRIDGE)	CY	68	\$ 570.00	\$ 38,760.00
11	STRUCTURE EXCAVATION (TYPE D)	CY	640	\$ 127.00	\$ 81,280.00
12	STRUCTURE BACKFILL (BRIDGE)	CY	275	\$ 469.00	\$ 128,975.00
13	FIBER ROLL	LF	480	\$ 45.00	\$ 21,600.00
14	HYDROSEED	SQFT	2,800	\$ 8.00	\$ 22,400.00
15	HOT MIX ASPHALT (TYPE A)	TON	196	\$ 1,069.00	\$ 209,524.00
16	24" CAST-IN-DRILLED-HOLE CONCRETE PILING	LF	1432	\$ 377.00	\$ 539,864.00
17	STRUCTURAL CONCRETE, BRIDGE FOOTING	CY	86	\$ 775.00	\$ 66,650.00
18	STRUCTURAL CONCRETE, BRIDGE	CY	148	\$ 3,272.00	\$ 484,256.00
19	STRUCTURAL CONCRETE, BRIDGE (POLYMER FIBER)	CY	93	\$ 384.00	\$ 35,712.00
20	FURNISH PRECAST PRESTRESSED CONCRETE CA WF GIRDER	EA	4	\$ 48,377.00	\$ 193,508.00

ITEM NO.	DESCRIPTION	UNIT MEAS	EST. QUANTITY	UNIT PRICE	TOTAL DOLLARS
21	ERECT PRECAST PRESTRESSED CONCRETE CA WF GIRDER	EA	4	\$ 24,868.00	\$ 98,744.00
22	JOINT SEAL (Type B)	LF	77	\$ 178.00	\$ 13,706.00
23	BAR REINFORCING STEEL (BRIDGE)	LB	56,727	\$ 2.50	\$ 141,817.50
24	BAR REINFORCING STEEL (EPOXY COATED) (BRIDGE)	LB	22,800	\$ 5.00	\$ 114,000.00
25	BRIDGE REMOVAL	LS	1	\$ 100,000.00	\$ 100,000.00
26	ROCK SLOPE PROTECTION (150 LB, CLASS III, METHOD B)	CY	472	\$ 206.00	\$ 97,232.00
27	ROCK SLOPE PROTECTION (1/2 TON, CLASS VII, METHOD B)	CY	1,362	\$ 200.00	\$ 280,572.00
28	ROCK SLOPE PROTECTION FABRIC (CLASS 8)	SQYD	1,128	\$ 20.00	\$ 22,560.00
29	TRANSITION RAILING (TYPE WB-31)	EA	4	\$ 8,500.00	\$ 34,000.00
30	IN-LINE TERMINAL SYSTEM	EA	4	\$ 5,500.00	\$ 22,000.00
31	CALIFORNIA ST-75 BRIDGE RAIL	LF	241	\$ 350.00	\$ 84,350.00
32	REMOVE GUARDRAIL	LF	250	\$ 50.00	\$ 12,500.00
33	PAINT TRAFFIC STRIPE (2-COAT)	LF	353	\$ 6.00	\$ 2,118.00
34	EMBANKMENT	CY	70	\$ 333.00	\$ 23,310.00
35	IMPORTED BORROW	CY	70	\$ 100.00	\$ 7,000.00

TOTAL BID (IN NUMBERS) 4,494,944

TOTAL BID (IN WORDS) FOUR MILLION FOUR HUNDRED AND NINETY FOUR THOUSAND NINE-HUNDRED FORTY-FOUR

REVIEWED AND CHECKED BY: _____

(For County Use)



This bid was received on Dec. 9
20.20 @ 3:27 p.m.
 ATTEST: Clint Quilter, Administrative Office
 and Clerk of the Board Inyo County, California
 By [Signature] Assistant

BID ITEM LIST
NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT PROJECT

BIDDER'S COMPANY NAME: MKD CONSTRUCTION, INC.

ABBREVIATIONS: LS = LUMP SUM SQFT = SQUARE FEET LF = LINEAR FEET
 CY = CUBIC YARD EA = EACH LB = POUND

ITEM NO.	DESCRIPTION	UNIT MEAS	EST. QUANTITY	UNIT PRICE	TOTAL DOLLARS
1	MOBILIZATION	LS	1	\$ 498,527	\$ 498,527
2	CONSTRUCTION SURVEYS	LS	1	\$ 27,500.00	\$ 27,500.00
3	TRAFFIC CONTROL SYSTEM	LS	1	\$ 116,500.00	\$ 116,500.00
4	JOB SITE MANAGEMENT	LS	1	\$ 44,000.00	\$ 44,000.00
5	PREPARE STORM WATER POLLUTION PREVENTION PLAN	LS	1	\$ 24,000.00	\$ 24,000.00
6	TEMPORARY CREEK DIVERSION SYSTEM	LS	1	\$ 250,000.00	\$ 250,000.00
7	REMOVE ASPHALT CONCRETE SURFACING	SQFT	7,470	\$ 2.25	\$ 16,808
8	TEMPORARY HIGH-VISIBILITY FENCE (TYPE ESA)	LF	1,330	\$ 7.00	\$ 9,310.00
9	CLEARING AND GRUBBING	LS	1	\$ 9,500.00	\$ 9,500.00
10	STRUCTURE EXCAVATION (BRIDGE)	CY	68	\$ 150.00	\$ 10,200.00
11	STRUCTURE EXCAVATION (TYPE D)	CY	640	\$ 125.00	\$ 80,000.00
12	STRUCTURE BACKFILL (BRIDGE)	CY	275	\$ 225.00	\$ 61,875.00
13	FIBER ROLL	LF	480	\$ 28.00	\$ 13,440.00
14	HYDROSEED	SQFT	2,800	\$ 2.00	\$ 5,600.00
15	HOT MIX ASPHALT (TYPE A)	TON	196	\$ 400.00	\$ 78,400.00
16	24" CAST-IN-DRILLED-HOLE CONCRETE PILING	LF	1432	\$ 1300.00 1,300.00	\$ 1,861,600.00 1,861,600.00
17	STRUCTURAL CONCRETE, BRIDGE FOOTING	CY	86	\$ 700.00	\$ 60,200.00
18	STRUCTURAL CONCRETE, BRIDGE	CY	148	\$ 1,400.00	\$ 207,200.00
19	STRUCTURAL CONCRETE, BRIDGE (POLYMER FIBER)	CY	93	\$ 2,950.00	\$ 274,350.00
20	FURNISH PRECAST PRESTRESSED CONCRETE CA WF GIRDER	EA	4	\$ 78,000.00	\$ 312,000.00

ITEM NO.	DESCRIPTION	UNIT MEAS	EST. QUANTITY	UNIT PRICE	TOTAL DOLLARS
21	ERECT PRECAST PRESTRESSED CONCRETE CA WF GIRDER	EA	4	\$ 16,000 ⁰⁰ =	\$ 64,000 ⁰⁰ =
22	JOINT SEAL (Type B)	LF	77	\$ 70 ⁰⁰ =	\$ 5,390 ⁰⁰ =
23	BAR REINFORCING STEEL (BRIDGE)	LB	56,727	\$ 2 ⁵⁰ =	\$ 1,418,181 ⁰⁰ =
24	BAR REINFORCING STEEL (EPOXY COATED) (BRIDGE)	LB	22,800	\$ 3 ¹⁰ =	\$ 70,680 ⁰⁰ =
25	BRIDGE REMOVAL	LS	1	\$ 40,000 ⁰⁰ =	\$ 40,000 ⁰⁰ =
26	ROCK SLOPE PROTECTION (150 LB, CLASS III, METHOD B)	CY	472	\$ 210 ⁰⁰ =	\$ 99,120 ⁰⁰ =
27	ROCK SLOPE PROTECTION (1/2 TON, CLASS VII, METHOD B)	CY	1,362	\$ 200 ⁰⁰ =	\$ 272,400 ⁰⁰ =
28	ROCK SLOPE PROTECTION FABRIC (CLASS 8)	SQYD	1,128	\$ 4 ⁵⁰ =	\$ 5,076 ⁰⁰ =
29	TRANSITION RAILING (TYPE WB-31)	EA	4	\$ 6,500 ⁰⁰ =	\$ 26,000 ⁰⁰ =
30	IN-LINE TERMINAL SYSTEM	EA	4	\$ 5,200 ⁰⁰ =	\$ 20,800 ⁰⁰ =
31	CALIFORNIA ST-75 BRIDGE RAIL	LF	241	\$ 452 ⁰⁰ =	\$ 108,932 ⁰⁰ =
32	REMOVE GUARDRAIL	LF	250	\$ 14 ⁰⁰ =	\$ 3,500 ⁰⁰ =
33	PAINT TRAFFIC STRIPE (2-COAT)	LF	353	\$ 25 ⁰⁰ =	\$ 8,825 ⁰⁰ =
34	EMBANKMENT	CY	70	\$ 75 ⁰⁰ =	\$ 5,250 ⁰⁰ =
35	IMPORTED BORROW	CY	70	\$ 100 ⁰⁰ =	\$ 7,000 ⁰⁰ =

TOTAL BID (IN NUMBERS) 4,799,000⁰⁰

TOTAL BID (IN WORDS) Four Million Seven hundred ninety nine thousand dollars and zero cents

REVIEWED AND CHECKED BY: _____
(For County Use)



This bid was received on Dec. 9
2020 at 3:26 p.m.
ATTEST: Clint Quilter, Administrative Officer
and Clerk of the Board Inyo County, California
By [Signature] Assistant

COUNTY OF INYO BID TABULATION

Project Title & Bid No. North Round Valley Road Bridge Replacement Over Pine Creek Project

Bid Opening Date: December 9, 2020

Location: County Admin Center

	BIDDER NAME	Bid Total	Bond
1.	Spiess Construction	\$3,339,322.55	✓
2.	MKD Construction	\$4,799,000.00	✓
3.	Granite Construction	\$3,989,829.00	✓
4.	Griffith Company	\$4,494,944.00	✓
5.			
6.			
7.			
8.			
9.			
10.			

Opened By: Darcy Ellis

Present: Cori Denault



**CONTRACT
BY AND BETWEEN
THE COUNTY OF INYO
and**

Spiess Construction Co., Inc., **CONTRACTOR**

for the

**NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT OVER PINE
CREEK PROJECT**

THIS CONTRACT is awarded by the COUNTY OF INYO to CONTRACTOR on and made and entered into effective, January 5, 2021, by and between the COUNTY OF INYO, a political subdivision of the State of California, (hereinafter referred to as "COUNTY"), and Spiess Construction Co., Inc. (hereinafter referred to as "CONTRACTOR"), for the construction or removal of the **NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT OVER PINE CREEK PROJECT** (hereinafter referred to as "PROJECT"), which parties agree, for and in consideration of the mutual promises, as follows:

1. SERVICES TO BE PERFORMED. CONTRACTOR shall furnish, at his/her own expense, all labor, materials, methods, processes, implements, tools, machinery, equipment, transportation, permits, services, utilities, and all other items, and related functions and otherwise shall perform all work necessary or appurtenant to construct the Project in accordance with the Special Provisions, which are incorporated herein by reference per section 4(c) of this Contract, within the Time for Completion set forth, as well as in all other in the Contract Documents, for:

Title: **NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT OVER PINE
CREEK PROJECT**

2. TIME OF COMPLETION. Project work shall begin within 14 calendar days after receipt of the Notice to Proceed (NTP) (or on the start of work date identified in the NTP) and shall continue until all requested services are completed. Said services shall be completed no later than the Time of Completion as noted in the Project's Special Provisions. Procedures for any extension of time shall be complied with as noted in the Project's Special Provisions.

3. PAYMENT/CONSIDERATION. For the performance of all such work, COUNTY shall pay to CONTRACTOR for said work the total amount of: three million three hundred thirty-four thousand five hundred two dollars and fifty-five cents dollars (**\$3,334,502.55**), adjusted by such increases or decreases as authorized in accordance with the Contract Documents, and payable at such times and upon such conditions as otherwise set forth in the Contract Documents.

4. ALL PROVISIONS SET FORTH HEREIN. CONTRACTOR and COUNTY agree that this Contract shall include and consist of:

- a. All of the provisions set forth expressly herein;

b. The Bid Proposal Form, the Faithful Performance Bond, and the Labor and Materials Payment Bond, all of which are incorporated herein and made a part hereof by this reference; and

c. All of the other Contract Documents, as described in **Section 5-1.02, "Definitions,"** of the Standard Specifications of the Inyo County Public Works Department, dated May, 2020, all of which are incorporated herein and made a part of this Contract by this reference, including without limitation, the Bid Package, the Standard Specifications of the Inyo County Public Works Department, dated May, 2020, and the Special Provisions concerning this Project including the Appendices, the Plans, any and all amendments or changes to any of the above-listed documents, including, without limitation, contract change orders, and any and all documents incorporated by reference into any of the above-listed documents.

5. STANDARD OF PERFORMANCE. Contractor represents that he/she is qualified and licensed to perform the work to be done as required in this Contract. County relies upon the representations of Contractor regarding professional and/or trade training, licensing, and ability to perform the services as a material inducement to enter into this Contract. Acceptance of work by the County does not operate to release Contractor from any responsibility to perform work to professional and/or trade standards. Contractor shall provide properly skilled professional and technical personnel to perform all services under this Contract. Contractor shall perform all services required by this Contract in a manner and according to the standards observed by a competent practitioner of the profession. All work products of whatsoever nature delivered to the County shall be prepared in a manner conforming to the standards of quality normally observed by a person practicing in Contractor's profession and/or trade.

6. INDEPENDENT CONTRACTOR. Nothing contained herein or any document executed in connection herewith, shall be construed to create an employer-employee, partnership or joint venture relationship between County and Contractor, nor to allow County to exercise discretion or control over the manner in which Contractor performs the work or services that are the subject matter of this Contract; provided, however, the work or services to be provided by Contractor shall be provided in a manner consistent with reaching the County's objectives in entering this Contract.

Contractor is an independent contractor, not an employee of County or any of its subsidiaries or affiliates. Contractor will not represent him/herself to be nor hold her/himself out as an employee of County. Contractor acknowledges that s/he shall not have the right or entitlement in or to any of the pension, retirement or other benefit programs now or hereafter available to County's employees. The consideration set forth in Paragraph 3 shall be the sole consideration due Contractor for the services rendered hereunder. It is understood that County will not withhold any amounts for payment of taxes from the Contractor's compensation hereunder. Any and all sums due under any applicable state, federal or municipal law or union or professional and/or trade guild regulations shall be Contractor's sole responsibility. Contractor shall indemnify and hold County harmless from any and all damages, claims and expenses arising out of or resulting from any claims asserted by any third party, including but not limited to a taxing authority, as a result of or in connection with payments due it from Contractor's compensation.

7. ASSIGNMENT AND SUBCONTRACTING. The parties recognize that a

substantial inducement to County for entering into this Contract is the professional reputation, experience and competence of Contractor. Assignments of any and/or all rights, duties or obligations of the Contractor under this Contract will be permitted only with the express consent of the County. Contractor shall not subcontract any portion of the work to be performed under this Contract without the written authorization of the County. If County consents to such subcontract, Contractor shall be fully responsible to County for all acts or omissions of the subcontractor. Nothing in this Contract shall create any contractual relationship between County and subcontractor, nor shall it create any obligation on the part of the County to pay any monies due to any such subcontractor, unless otherwise required by law.

8. CLAIMS RESOLUTION. Pursuant to **Section 9204 of the Public Contract Code**, any and all claims submitted by Contractor to County will follow the provisions as set forth in the Project's Special Provisions.

9. INSURANCE INDEMNIFICATION. Contractor shall hold harmless, defend and indemnify County and its officers, officials, employees and volunteers from and against all claims, damages, losses, and expenses, including attorney fees arising out of the performance of the work described herein, caused in whole or in part by any negligent act or omission of the Contractor, any subcontractor, anyone directly or indirectly employed by any of them, or anyone for whose acts any of them may be liable, except where caused by the active negligence, sole negligence, or willful misconduct of the County.

10. INSURANCE. For the duration of this Agreement, Contractor shall procure and maintain insurance of the scope and amount specified in Attachment 3 and with the provisions specified in that attachment.

11. POLITICAL REFORM ACT. Contractor is not a designated employee within the meaning of the Political Reform Act because Contractor:

- a. Will conduct research and arrive at conclusions with respect to his/her rendition of information, advice, recommendation or counsel independent of the control and direction of the County or of any County official, other than normal Contract monitoring; and
- b. Possesses no authority with respect to any County decision beyond rendition of information, advice, recommendation or counsel [FPPC Reg. 18700(a)(2)].

12. COMPLIANCE WITH ALL LAWS.

Performance Standards: Contractor shall use the standard of care in its profession and/or trade to comply with all applicable federal, state and local laws, codes, ordinances and regulations that relate to the work or services to be provided pursuant to this Contract.

a. Safety Training:

i. Contractor shall provide such safety and other training as needed to assure work will be performed in a safe and healthful manner "in a language" that is understandable to employees receiving the training. The training shall in all respects be in compliance with CAL OSHA; and

ii. Contractor working with employees shall maintain a written Injury and Illness Prevention (IIP) Program, a copy of which must be maintained at each worksite or at a central worksite identified for the employees, if the Contractor has non-fixed worksites; and

iii. Contractor using subcontractors with the approval of the County to perform the work which is the subject of this Contract shall require each subcontractor working with employees to comply with the requirements of this section.

b. Child, Family and Spousal Support reporting Obligations:

i. Contractor shall comply with the state and federal child, family and spousal support reporting requirements and with all lawfully served wage and earnings assignment orders or notices of assignment relating to child, family and spousal support obligations.

c. Nondiscrimination:

i. Contractor shall not discriminate in employment practices or in the delivery of services on the basis of membership in a protected class which includes any class recognized by law and not limited to race, color, religion, sex (gender), sexual orientation, marital status, national origin (Including language use restrictions), ancestry, disability (mental and physical, including HIV and Aids), medical Conditions (cancer/genetic characteristics), age (40 and above) and request for family care leave.

ii. Contractor represents that it is in compliance with federal and state laws prohibiting discrimination in employment and agrees to stay in compliance with the Americans with Disabilities Act of 1990 (42 U.S.C. sections 12101, et. seq.), Age Discrimination in Employment Act of 1975 (42 U.S.C. 5101, et. seq.), Title VII (42 U.S.C. 2000, et. seq.), the California Fair Employment Housing Act (California Government Code sections 12900, et. seq.) and regulations and guidelines issued pursuant thereto.

13. LICENSES. Contractor represents and warrants to County that it has all licenses, permits, qualifications, insurance and approvals of whatsoever nature which are legally required of Contractor to practice its trade and/or profession. Contractor represents and warrants to County that Contractor shall, at its sole cost and expense, keep in effect or obtain at all times during the term of this Contract, any licenses, permits, insurance and approvals which are legally required of Contractor to practice its and/or profession.

14. PREVAILING WAGE. Pursuant to **Section 1720 et seq. of the Labor Code**, Contractor agrees to comply with the Department of Industrial Relations regulations, to which this Contract is subject, the prevailing wage per diem rates in Inyo County have been determined by the Director of the State Department of Industrial Relations. These wage rates appear in the Department publication entitled "General Prevailing Wage Rates," in effect at the time the project is advertised. Future effective wage rates, which have been predetermined and are on file with the State Department of Industrial Relations are referenced but not printed in said publication. Such rates of wages are also on file with the State Department of Industrial Relations and the offices of the Public Works Department of the County of Inyo and are available to any interested party upon request. Contractor agrees to comply with County and the Department of Industrial Relations regulations in submitting the certified payroll.

15. CONTROLLING LAW VENUE. This Contract is made in the County of Inyo, State of California. The parties specifically agree to submit to the jurisdiction of the Superior Court of California for the County of Inyo.

16. WRITTEN NOTIFICATION. Any notice, demand, request, consent, approval or

communication that either party desires or is required to give to the other party shall be in writing and either served personally or sent prepaid, first class mail. Any such notice, demand, et cetera, shall be addressed to the other party at the address set forth herein below. Either party may change its address by notifying the other party of the change of address. Notice shall be deemed communicated within 48 hours from the time of mailing if mailed as provided in this section.

If to County: County of Inyo
Public Works Department
Attn: Jake Trauscht
168 N. Edwards
PO Drawer Q
Independence, CA 93526

If to Contractor: _____

17. AMENDMENTS. This Contract may be modified or amended only by a written document executed by both Contractor and County and approved as to form by Inyo County Counsel.

18. WAIVER. No failure on the part of either party to exercise any right or remedy hereunder shall operate as a waiver of any other right or remedy that party may have hereunder.

19. TERMINATION. This Contract may be terminated for the reasons stated below:

- a. Immediately for cause, if either party fails to perform its responsibilities under this Contract in a timely and professional manner and to the satisfaction of the other party or violates any of the terms or provisions of this Contract. If termination for cause is given by either party to the other and it is later determined that the other party was not in default or default was excusable, then the notice of termination shall be deemed to have been given without cause pursuant to paragraph “b” of this section; or
- b. By either party without cause upon fifteen (15) days' written notice of termination. Upon termination, Contractor shall be entitled to compensation for services performed up to the effective date of termination; or
- c. By County upon oral notice from the Board of Supervisors based on funding ending or being materially decreased during the term of this Contract.

20. TIME IS OF THE ESSENCE. Time is of the essence for every provision.

21. SEVERABILITY. If any provision of this Contract is held to be invalid, void or unenforceable, the remainder of the provision and/or provisions shall remain in full force and effect and shall not be affected, impaired or invalidated.

22. CONTRACT SUBJECT TO APPROVAL BY BOARD OF SUPERVISORS. It is

understood and agreed by the parties that this Contract is subject to the review and approval by the Inyo County Board of Supervisors upon Notice and Public Hearing. In the event that the Board of Supervisors declines to enter into or approve said Contract, it is hereby agreed to that there is, in fact, no binding agreement, either written or oral, between the parties herein.

23. CONTRACT SUBJECT TO MASTER LEASE. It is understood and agreed by the parties that this Contract and the Lone Pine Dog Park Project is subject to review and approval by the Los Angeles Department of Water and Power, as owner of the land on which the dog park will be located. Contractor's activities are further subject to any terms, conditions, and/or limitations set forth in the Lease between the County of Inyo and City of Los Angeles, Department of Water and Power, for 4.13 acres of land known as Lone Pine Park, or any subsequent leases that may be negotiated between the Los Angeles Department of Water and Power and Inyo County.

24. ATTACHMENTS. All attachments referred to are incorporated herein and made a part of this Contract.

25. EXECUTION. This Contract may be executed in several counterparts, each of which shall constitute one and the same instrument and shall become binding upon the parties. In approving this Contract, it shall not be necessary to produce or account for more than one such counterpart.

26. ENTIRE AGREEMENT. This Contract, including the Contract Documents and all other documents which are incorporated herein by reference, constitutes the complete and exclusive agreement between the County and Contractor. All prior written and oral communications, including correspondence, drafts, memoranda, and representations, are superseded in total by this Contract.

27.

---o0o---

IN WITNESS WHEREOF, COUNTY and CONTRACTOR have each caused this Contract to be executed on its behalf by its duly authorized representative, effective as of the day and year first above written.

COUNTY

CONTRACTOR

COUNTY OF INYO

By: _____

By: _____

Name: _____

Name: _____

Title: _____

Title: _____

Dated: _____

Dated: _____

APPROVED AS TO FORM AND LEGALITY:

County Counsel

APPROVED AS TO ACCOUNTING FORM:

County Auditor

APPROVED AS TO INSURANCE REQUIREMENTS:

County Risk Manager

ATTACHMENT 1

NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT OVER PINE CREEK PROJECT

**FAITHFUL PERFORMANCE BOND
(100% OF CONTRACT AMOUNT)**

KNOW ALL MEN BY THESE PRESENTS: That Spieß Construction Co., Inc.
_____ as Principal, hereinafter "Contractor,"
(Name of Contractor)
and _____
(Name of Corporate Surety)

as Corporate Surety, hereinafter called Surety, are held and firmly bound unto the County of Inyo as Oblige, hereinafter called County, in the amount of three million three hundred thirty-four thousand five hundred two dollars and fifty-five cents dollars (**\$3,334,502.55**), for the payment whereof Contractor and Surety bind themselves, their heirs, executors, administrators, successors and assignees, jointly and severally, firmly by these presents.

WHEREAS, Contractor has, by written Contract, dated _____, 20____, entered into an Contract with the County for the Construction of the **NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT OVER PINE CREEK PROJECT** (hereinafter referred to as "Project"), to be constructed in accordance with the terms and conditions set forth in the Contract for the Project, which contract is by reference incorporated herein and is hereinafter referred to as the "Contract."

NOW, THEREFORE, THE CONDITION OF THIS OBLIGATION is such that, if Contractor shall promptly and faithfully perform said Contract, then this obligation shall be null and void; otherwise it shall remain in full force and effect.

The Surety hereby waives notice of any alteration or extension of time made by the County.

Whenever Contractor shall be, and is declared by County to be, in default under the Contract, the County having performed Owner's obligations thereunder, the Surety may promptly remedy the default, or shall promptly either:

1. Complete the Contract in accordance with its terms and conditions; or,
2. Obtain a Bid or Bids for completing the Contract in accordance with its terms and conditions, and upon determination by Surety of the lowest responsible Bidder, or if the County elects, upon determination by the County and the Surety jointly of the lowest responsible Bidder, arrange for a Contract between such Bidder and County, and make available as work progresses (even though there should be a default or a succession of defaults under the Contract or contracts of completion arranged under

this paragraph) sufficient funds to pay the cost of completion less the balance of the Contract price; but not exceeding, including other costs and damages for which the Surety may be liable hereunder, the amount set forth in the first paragraph hereof. The term "balance of the Contract price", as used in this paragraph, shall mean the total amount payable by County to Contractor under the Contract and any amendments thereto, less the amount properly paid by County to Contractor.

Any suit under this Bond must be instituted before the expiration of two (2) years from the date on which final payment under the Contract falls due, or the date on which any warranty or guarantee period expires, whichever is later.

No right of action shall accrue on this Bond to or for the use of any person or corporation other than the County named herein.

---o0o---

Signed and sealed this _____ day of _____, 20 ____.

(Name of Corporate Surety)

By: _____
(Signature)

(SEAL)

(Title of Authorized Person)

(Address for Notices to be Sent)

(Name of Contractor)

By: _____
(Signature)

(SEAL)

(Title of Authorized Person)

(Address for Notices to be Sent)

NOTE: THE SIGNATURES OF THE CONTRACTOR AND THE SURETY MUST EACH BE ACKNOWLEDGED BEFORE A NOTARY PUBLIC (OR OTHER OFFICER AUTHORIZED UNDER CALIFORNIA LAW) AND THE ACKNOWLEDGMENTS MUST BE ATTACHED TO THIS BOND.

The Faithful Performance Bond must be executed by a corporate surety on this form. No substitutions will be accepted. If an attorney-in-fact signs for the surety, an acknowledged statement from the surety appointing and empowering the attorney-in-fact to execute such bonds in such amounts on behalf of the surety must accompany the Faithful Performance Bond.

ADDRESS OF COUNTY FOR NOTICES TO BE SENT:

County of Inyo
224 North Edwards Street, P.O. Box N
Independence, California 93526

ATTACHMENT 2

NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT OVER PINE CREEK PROJECT

**LABOR AND MATERIALS PAYMENT BOND
(100% OF CONTRACT AMOUNT)**

KNOW ALL MEN BY THESE PRESENTS, that Spieess Construction Co., Inc.
(Name of Contractor)

_____ as Principal, hereinafter "CONTRACTOR,"

and _____
(Name of Corporate Surety)

as Corporate Surety, hereinafter called SURETY, are held and firmly bound unto the County of Inyo as Obligee, hereinafter called COUNTY, for the use and benefit of claimants as hereinafter defined in the amount of three million three hundred thirty-four thousand five hundred two dollars and fifty-five cents dollars (\$3,334,502.55), for the payment whereof Contractor and Surety bind themselves, their heirs, executors, administrators, successors and assignees, jointly and severally, firmly by these presents.

WHEREAS, Contractor has by written contract dated _____, 20____, entered into an Contract with the County for the construction of the **NORTH ROUND VALLEY ROAD BRIDGE OVER PINE CREEK PROJECT** (hereinafter referred to as "PROJECT"), to be constructed in accordance with the terms and conditions set forth in the contract for the PROJECT, which contract is by reference incorporated herein, and is hereinafter referred to as the "CONTRACT."

NOW, THEREFORE, THE CONDITION OF THIS OBLIGATION is such that, if Contractor shall promptly make payment to all claimants as hereinafter defined, for all labor and materials used or reasonably required for use in the performance of the Contract, then this obligation shall be void; otherwise, it shall remain in full force and effect, subject, however, to the following conditions:

1. A claimant is defined as one having a direct contract with the Contractor, or with a Subcontractor of the Contractor, for labor, materials, or both, used or reasonably required for use in the performance of the Contract. Labor and materials is construed to include, but not limited to, that part of water, gas, power, light, heat, oil, gasoline, telephone service or rental of equipment directly applicable to the Contract.
2. The above named Contractor and Surety hereby jointly agree with the County that every claimant as herein defined, who has not been paid in full before the expiration of a period of ninety (90) calendar days after the date on which the last of such claimant's work or

labor was done or performed, or materials were furnished by such claimant, may sue on this Bond for the benefit of such claimant, prosecute the suit to final judgment for such sum or sums as may be justly due claimant, and have execution thereon. The County shall not be liable for the payment of any costs or expenses of any such suit.

3. No suit or action shall be commenced hereunder by any claimant:

a) Unless claimant, other than one having a direct contract with the Contractor, shall have given written notice to any two of the following: the Contractor, the County, or the Surety above named, within ninety (90) calendar days after such claimant did or performed the last of the work or labor, or furnished the last of the material for which said claim is made, stating with substantial accuracy the amount claimed and the name of the party to whom the materials were furnished, or for whom the work or labor was done or performed. Such notice shall be served by mailing the same by registered mail or certified mail, postage prepaid, in any envelope addressed to the Contractor, County, or Surety, at the address below, or at any place where an office is regularly maintained for the transaction of their business. Such notice may also be served in the state in which the aforesaid project is located, save that such service need not be made by a public officer.

b) After the expiration of one (1) year following the date on which County accepted the work done under the Contract. However, if any limitation embodied in this Bond is prohibited by any law controlling the construction hereof, such limitation shall be deemed to be amended so as to be equal to the minimum period of limitation permitted by such law.

c) Other than in a State Court of competent jurisdiction in and for the County or other political subdivision of the state in which the Project, or any part thereof, is situated, and not elsewhere.

4. The amount of this Bond shall be reduced by and to the extent of any payment or payments made in good faith hereunder, inclusive of the payment by Surety of mechanics' liens which may be filed or recorded against said Project, whether or not claim for the amount of such lien be presented under and against this Bond.

---o0o---

Signed and sealed this _____ day of _____, 20 ____.

(Name of Contractor)

By: _____
(Signature)

(SEAL)

(Title of Authorized Person)

(Address for Notices to be Sent)

(Name of Corporate Surety)

By: _____
(Signature)

(SEAL)

(Title of Authorized Person)

(Address for Notices to be Sent)

NOTE:

THE SIGNATURES OF THE CONTRACTOR AND THE SURETY MUST BE ACKNOWLEDGED BEFORE A NOTARY PUBLIC (OR OTHER OFFICER AUTHORIZED UNDER CALIFORNIA LAW).

The Labor and Materials Payment Bond must be executed by a corporate surety on this form. No substitutions will be accepted. If an attorney-in-fact signs for the surety, an acknowledged statement from the surety appointing and empowering the attorney-in-fact to execute such bonds in such amounts on behalf of the surety, must accompany the Labor and Materials Payment Bond.

ADDRESS OF COUNTY FOR NOTICES TO BE SENT TO:

**County of Inyo
224 N. Edwards, P.O. Box N
Independence, California 93526**

ATTACHMENT 3

AGREEMENT BETWEEN THE COUNTY OF INYO AND

Spiess Construction Co., Inc

FOR THE NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT OVER PINE CREEK PROJECT

TERM:

FROM: _____ TO: _____

SEE ATTACHED INSURANCE PROVISIONS

NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT OVER PINE CREEK INSURANCE PROVISIONS

Contractor shall procure and maintain for the duration of the contract, and for six years thereafter, insurance against claims for injuries to persons or damages to property which may arise from or in connection with the performance of the work hereunder by the Contractor, his agents, representatives, employees, or subcontractors.

MINIMUM SCOPE AND LIMIT OF INSURANCE

Coverage shall be at least as broad as:

1. **Commercial General Liability (CGL):** Insurance Services Office (ISO) Form CG 00 01 covering CGL on an "occurrence" basis, including products and completed operations, property damage, bodily injury and personal & advertising injury with limits no less than **\$5,000,000** per occurrence. If a general aggregate limit applies, either the general aggregate limit shall apply separately to this project/location (ISO CG 25 03 or 25 04) or the general aggregate limit shall be twice the required occurrence limit.
2. **Automobile Liability:** Insurance Services Office Form CA 0001 covering Code 1 (any auto), with limits no less than **\$5,000,000** per accident for bodily injury and property damage.
3. **Workers' Compensation** insurance as required by the State of California, with Statutory Limits, and Employers' Liability insurance with a limit of no less than \$1,000,000 per accident for bodily injury or disease.
4. **Builder's Risk (Course of Construction)** insurance utilizing an "All Risk" (Special Perils) coverage form, with limits equal to the completed value of the project and no coinsurance penalty provisions.
5. **Surety Bonds** as described below.
6. **Professional Liability** (if Design/Build), with limits no less than \$2,000,000 per occurrence or claim, and \$2,000,000 policy aggregate.
7. **Contractors' Pollution Legal Liability** and/or Asbestos Legal Liability and/or Errors and Omissions (if project involves environmental hazards) with limits no less than \$1,000,000 per occurrence or claim, and \$2,000,000 policy aggregate.

If the contractor maintains broader coverage and/or higher limits than the minimums shown above, Inyo County requires and shall be entitled to the broader coverage and/or the higher limits maintained by the contractor. Any available insurance proceeds in excess of the specified minimum limits of insurance and coverage shall be available to Inyo County.

OTHER INSURANCE PROVISIONS

The insurance policies are to contain, or be endorsed to contain, the following provisions:

Additional Insured Endorsement

Inyo County, its officers, officials, employees, and volunteers are to be covered as additional insureds on the CGL policy with respect to liability arising out of work or operations performed by or on behalf of the Contractor including materials, parts, or equipment furnished in connection with such work or operations and automobiles owned, leased, hired, or borrowed by or on behalf of the Contractor. General liability coverage can be provided in the form of an endorsement to the Contractor's insurance (at least as broad as ISO Form CG 20 10, CG 11 85 or **both** CG 20 10, CG 20 26, CG 20 33, or CG 20 38; **and** CG 20 37

**NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT OVER PINE CREEK
INSURANCE PROVISIONS**

forms if later revisions used). An additional insured endorsement must be submitted along with the certificate of insurance as evidence, though failure to supply does not relive contractor of requirement.

Waiver of Subrogation

Contractor hereby agrees to waive rights of subrogation which any insurer of Contractor may acquire from Contractor by virtue of the payment of any loss. Contractor agrees to obtain any endorsement that may be necessary to affect this waiver of subrogation. **The Workers' Compensation policy shall be endorsed with a waiver of subrogation** in favor of Inyo County for all work performed by the Contractor, its employees, agents and subcontractors. An endorsement specifying this waiver must be submitted along with the certificate of insurance as evidence, though failure to supply does not relive contractor of requirement.

Primary Coverage

For any claims related to this project, the **Contractor's insurance coverage shall be primary** insurance coverage at least as broad as ISO CG 20 01 04 13 as respects Inyo County, its officers, officials, employees, and volunteers. Any insurance or self-insurance maintained by Inyo County, its officers, officials, employees, or volunteers shall be excess of the Contractor's insurance and shall not contribute with it.

Notice of Cancellation

Each insurance policy required by this clause shall provide that coverage shall not be canceled, except with notice to Inyo County.

Self-Insured Retentions

Self-insured retentions must be declared to and approved by Inyo County. At the option of Inyo County, either: the contractor shall cause the insurer shall to reduce or eliminate such self-insured retentions as respects Inyo County, its officers, officials, employees, and volunteers; or the Contractor shall provide a financial guarantee satisfactory to Inyo County guaranteeing payment of losses and related investigations, claim administration, and defense expenses. The policy language shall provide, or be endorsed to provide, that the self-insured retention may be satisfied by either the named insured or Inyo County.

Builder's Risk (Course of Construction) Insurance

Contractor may submit evidence of Builder's Risk insurance in the form of Course of Construction coverage. Such coverage shall **name Inyo County as a loss payee** as their interest may appear.

If the project does not involve new or major reconstruction, at the option of Inyo County, an Installation Floater may be acceptable. For such projects, a Property Installation Floater shall be obtained that provides for the improvement, remodel, modification, alteration, conversion or adjustment to existing buildings, structures, processes, machinery and equipment. The Property Installation Floater shall provide property damage coverage for any building, structure, machinery or equipment damaged, impaired, broken, or destroyed during the performance of the Work, including during transit, installation, and testing at Inyo County's site.

Claims Made Policies – (If at all possible avoid and require occurrence type CGL policies)

NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT OVER PINE CREEK INSURANCE PROVISIONS

If any coverage required is written on a claims-made coverage form:

1. The retroactive date must be shown, and this date must be before the execution date of the contract or the beginning of contract work.
2. Insurance must be maintained and evidence of insurance must be provided for at least five (5) years after completion of contract work.
3. If coverage is cancelled or non-renewed, and not replaced with another claims-made policy form with a retroactive date prior to the contract effective, or start of work date, the Contractor must purchase extended reporting period coverage for a minimum of five (5) years after completion of contract work.
4. A copy of the claims reporting requirements must be submitted to Inyo County for review.
5. If the services involve lead-based paint or asbestos identification/remediation, the Contractors Pollution Liability policy shall not contain lead-based paint or asbestos exclusions. If the services involve mold identification/remediation, the Contractors Pollution Liability policy shall not contain a mold exclusion, and the definition of Pollution shall include microbial matter, including mold.

Acceptability of Insurers

Insurance is to be placed with insurers authorized to conduct business in the state with a current A.M. Best rating of no less than A: VII, unless otherwise acceptable to Inyo County.

Verification of Coverage

Contractor shall furnish Inyo County with original Certificates of Insurance including all required amendatory endorsements (or copies of the applicable policy language effecting coverage required by this clause) and a copy of the Declarations and Endorsement Page of the CGL policy listing all policy endorsements to Inyo County before work begins. However, failure to obtain the required documents prior to the work beginning shall not waive the Contractor's obligation to provide them. Inyo County reserves the right to require complete, certified copies of all required insurance policies, including endorsements, required by these specifications, at any time.

Subcontractors

Contractor shall require and verify that all subcontractors maintain insurance meeting all requirements stated herein, and Contractor shall ensure that Inyo County is an additional insured on insurance required from subcontractors. For CGL coverage, subcontractors shall provide coverage with a form at least as broad as CG 20 38 04 13.

Surety Bonds

Contractor shall provide the following Surety Bonds:

1. Bid Bond
2. Performance Bond
3. Payment Bond
4. Maintenance Bond

The Payment Bond and the Performance Bond shall be in a sum equal to the contract price. If the Performance Bond provides for a one-year warranty a separate Maintenance Bond is not necessary. If the warranty period specified in the contract is for longer than one year a

**NORTH ROUND VALLEY ROAD BRIDGE REPLACEMENT OVER PINE CREEK
INSURANCE PROVISIONS**

Maintenance Bond equal to 10% of the contract price is required. Bonds shall be duly executed by a responsible corporate surety, authorized to issue such bonds in the State of California and secured through an authorized agent with an office in California.

Special Risks or Circumstances

Inyo County reserves the right to modify these requirements, including limits, based on the nature of the risk, prior experience, insurer, coverage, or other circumstances.



County of Inyo



Health & Human Services - First 5 DEPARTMENTAL - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Serena Johnson

SUBJECT: Proclamation declaring January 2021 as Positive Parenting Awareness Month

RECOMMENDED ACTION:

Request Board approve a proclamation declaring January 2021 as Positive Parenting Awareness Month in Inyo County.

SUMMARY/JUSTIFICATION:

The attached proclamation recognizes the power of positive parenting, noting that raising children to become healthy, confident, and capable individuals is the most important job parents and caregivers have; and positive parenting is a protective factor that strengthens family relationships, increases parents' confidence, and promotes children's healthy development.

Positive Parenting Awareness Month (PPAM) was first recognized in Inyo County in 2019, joining counties across California in celebrating and supporting parents and families. Locally, Inyo County Health and Human Services First 5 facilitates the Inyo County Triple P Network, providing peer support, training, and coordination of the Triple P Positive Parenting Program across Inyo County.

HHS programs First 5, FIRST Wraparound, and Tecopa, are joined by Owens Valley Career Development Center's Tuniwa Nobi Family Literacy Program, Wild Iris, Exceptional Family Early Start Resource Center, Kern Regional Center, and Inyo County Office of Education Child Development program in offering a variety of positive parenting supports for families to take advantage of in January.

Inyo County Health and Human Services is respectfully requesting approval of the attached proclamation declaring January 2020 as Positive Parenting Awareness Month in Inyo County.

BACKGROUND/HISTORY OF BOARD ACTIONS:

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

Your Board could choose to not adopt this resolution, which would mean that January 2021 would not be declared as Positive Parenting Awareness Month countywide.

OTHER AGENCY INVOLVEMENT:

Owens Valley Career Development Center's Tuniwa Nobi Family Literacy Program, Wild Iris, Exceptional Family

Early Start Resource Center, Kern Regional Center, and Inyo County Office of Education Child Development

FINANCING:

No funding is involved with this resolution.

ATTACHMENTS:

1. Positive Parenting Month Proclamation 2021

APPROVALS:

Serena Johnson	Created/Initiated - 12/24/2020
Darcy Ellis	Approved - 12/24/2020
Marilyn Mann	Approved - 12/24/2020
Marshall Rudolph	Approved - 12/28/2020
Marilyn Mann	Final Approval - 12/28/2020



**INYO COUNTY BOARD OF SUPERVISORS
PROCLAMATION
PROCLAIMING JANUARY 2021
AS POSITIVE PARENTING AWARENESS
MONTH IN INYO COUNTY**



***WHEREAS**, raising children and youth to become healthy, confident, capable individuals is the most important job parents and caregivers have; and positive parenting is a protective factor that strengthens family relationships, increases parents' confidence, and promotes children's healthy development; and*

***WHEREAS**, the quality of parenting or caregiving – starting prenatally – is one of the most powerful predictors of children's future social, emotional, and physical health; and in Inyo County, families come in many forms and children are raised by parents, grandparents, foster parents, family members and other caregivers; and*

***WHEREAS**, positive parenting prevents and heals the effects of Adverse Childhood Experiences (ACEs) such as child abuse, neglect, and other traumatic events that can create dangerous levels of stress, and impair lifelong health and well-being; and*

***WHEREAS**, Adverse Childhood Experiences are often rooted in Adverse Community Environments that lack equity, as measured by the presence of racism and discrimination, concentrated poverty, poor housing conditions, higher risk of violence, homelessness, and other barriers to opportunity; and*

***WHEREAS**, all parents have inner strengths or resources that can serve as a foundation for building their resilience and for passing these strengths on to their children, yet many parents and caregivers feel stressed, isolated, and overwhelmed, no matter their age, race, ethnicity, or income level—and this has been intensified by the health, economic, and social-emotional impacts of the COVID-19 pandemic; and*

***WHEREAS**, in Inyo County, families can receive support from various programs like Triple P Positive Parenting, Fatherhood & Motherhood is Sacred, and Parent Café facilitated by: HHS First 5, Tecopa, and FIRST, Kern Regional Center, Wild Iris and CASA, OVCDC Tuniwa Nobi and Inyo County Office of Education; and*

***WHEREAS**, Triple P offers parents and caregivers an evidence-based "tool kit" of proven strategies such as quality time, giving affection, and descriptive praise that help strengthen family relationships, promote children's development, and prevent or manage common parenting challenges; and*

***WHEREAS**, Fatherhood & Motherhood is Sacred curriculum offers participants the opportunity to gain a deeper understanding of their heritage and the importance of responsible fatherhood and motherhood as reflected in Native American values and beliefs.*

***WHEREAS**, family support providers in Inyo County adapted quickly in response to the COVID-19 pandemic, shifting to virtual service delivery in order to maintain continuity of essential services that support the physical, social-emotional, and behavioral health of children and families; and*

***WHEREAS**, all community members, businesses, early care and education providers, schools, faith-based organizations, non-profit service providers, government agencies, and health care providers play a vital role in creating equitable opportunities for families to thrive and raise happy, healthy children; and*

***WHEREAS**, during the month of January, Inyo County Health and Human Services along with public, private, and nonprofit partners, will be increasing awareness of the importance of positive parenting and the availability of resources such as Triple P and those mentioned above;*

***NOW, THEREFORE, BE IT PROCLAIMED** that January 2021 be the 3rd Annual Positive Parenting Awareness Month in Inyo County, California, and commend this observance to the people of this county.*

***PASSED AND PROCLAIMED** this January 5 day of 2021.*

Supervisor Matt Kingsley, Board Chairperson



County of Inyo



Board of Supervisors

DEPARTMENTAL - ACTION REQUIRED

MEETING: January 5, 2021

FROM:

SUBJECT: Letter Requesting Airbnb Assistance

RECOMMENDED ACTION:

Request Board consider and approve sending a joint letter from the Board of Supervisors and Bishop City Council asking for Airbnb's cooperation in discouraging bookings while Inyo County is under a Regional Stay at Home Order.

SUMMARY/JUSTIFICATION:

Inyo County and the City of Bishop, as part of the Greater Los Angeles Region, are currently under a stay-at-home order until at least January 13. The order will only be lifted once the region's ICU bed capacity is at least 15%. This Order, issued by Governor Newsom on December 3, states that when any California region is under a Regional Stay at Home Order "no hotel or lodging entity in California can accept or honor out-of-state reservations for non-essential travel, unless the reservation is for at least the minimum time period required for quarantine and the persons identified in the reservation will quarantine in the hotel or lodging entity until after that time period has expired. Additionally, hotels and lodging entities in a county under a Regional Stay Home Order cannot accept or honor in-state reservations for non-essential travel."

Your Board is being asked to approve a joint letter with the City of Bishop to Airbnb requesting their assistance with and cooperation in discouraging bookings in our area until the Order is lifted.

BACKGROUND/HISTORY OF BOARD ACTIONS:

N/A

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

Your Board may decide against sending the letter or request edits be made.

OTHER AGENCY INVOLVEMENT:

N/A

FINANCING:

N/A

ATTACHMENTS:

1. Joint Airbnb Letter

APPROVALS:

Darcy Ellis
Clint Quilter

Created/Initiated - 12/31/2020
New -



BOARD OF SUPERVISORS COUNTY OF INYO

P. O. BOX N • INDEPENDENCE, CALIFORNIA
93526
TELEPHONE (760) 878-0373
e-mail: dellis@inyocounty.us

CITY COUNCIL CITY OF BISHOP

P. O. BOX 1236 • BISHOP, CALIFORNIA
93526
TELEPHONE (760) 873-5863
e-mail: cityclerk@cityofbishop.com



January 5, 2021

Airbnb

Attention: Adam Thongsavat, program director, and Toral Patel, policy manager
888 Brannan St.
Francisco, CA 94103

Dear Mr. Thongsavat and Ms. Patel,

We are writing to you as elected officials representing the City of Bishop and Inyo County, home to Death Valley National Park and Mt. Whitney. The Bishop City Council and Inyo County Board of Supervisors are asking for your help in reducing the spread of the COVID-19 virus by working with your short-term (STR) rental operators and guests to adhere to the current Regional Stay at Home Order issued by Governor Newsom on December 3, 2020. The City of Bishop and Inyo County, as part of the Greater Los Angeles Region, are currently under a stay-at-home order through at least January 13. The Order will only be lifted once the region's ICU bed capacity is at least 15%.

The Order states that when any California region is under a Regional Stay at Home Order “no hotel or lodging entity in California can accept or honor out-of-state reservations for non-essential travel, unless the reservation is for at least the minimum time period required for quarantine and the persons identified in the reservation will quarantine in the hotel or lodging entity until after that time period has expired. Additionally, hotels and lodging entities in a county under a Regional Stay Home Order cannot accept or honor in-state reservations for non-essential travel.” We have corresponded with current Transient Occupancy Tax (TOT) certificate holders to make them aware of the current restrictions.

However, we know that there are still many reservations for the City of Bishop and Inyo County over the next two weeks through your site and other online platforms. We ask you to please take the following steps to help us address this issue:

1. Inform owners and guests that if they currently have bookings and are not considered “essential personnel,” these reservations violate the current Stay at Home Order for our area and should be cancelled. (STR operators can rent for “essential functions and travel including COVID-19 mitigation and containment measures, treatment measures, accommodation for essential workers, or housing solutions, including measures to protect homeless populations.”)
2. Work with property owners to allow for full refunds or rebooking so guests can return to our area when it is safe to do so.

3. If you are unable or unwilling to reach out to property owners directly, we ask that you work with county staff to help us identify noncompliant properties so we can contact those property owners.

Your support will help STR operators comply with the Order and also ensure our rural healthcare systems do not become additionally burdened and overrun. In addition, the City of Bishop and Inyo County are looking at options to penalize STR operators who rent their properties during this time. Your assistance will also help STR operators avoid losing their permits which would negatively impact Airbnb should several operators lose the ability to rent in the future. Thank you for your cooperation in this matter.

This year has been challenging for us, but by working together to limit the spread and protect our resources, I hope we can return to normal soon and get back to welcoming visitors to our beautiful area. Please do not hesitate to contact us if you have additional questions

Sincerely,

Jeff Griffiths, Chairperson
Inyo County Board of Supervisors

Stephen Muchovej, Mayor
City of Bishop



County of Inyo



Planning Department

DEPARTMENTAL - ACTION REQUIRED

MEETING: January 5, 2021

FROM:

SUBJECT:

RECOMMENDED ACTION:

Request Board review the West-wide Energy Corridor, Regions 4, 5 and 6, Report (specifically Region 5) and draft correspondence (Attachment 1); provide comments; and, authorize the Chairperson to sign.

SUMMARY/JUSTIFICATION:

Section 368 of the Energy Policy Act of 2005, Public Law 109-58 (H.R. 6), enacted in 2005, directed the Secretaries of Agriculture, Commerce, Defense, Energy, and the Interior to designate corridors on federal land in 11 Western States (Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming) for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities. A Programmatic Environmental Impact Statement (PEIS) for the West-wide Energy Corridor (WEC) was prepared and corresponding Records of Decision (ROD) were adopted in 2009.

Multiple organizations filed a complaint raising a variety of challenges to the ROD. A Settlement Agreement with specific actions was ultimately approved, with four principal components: (1) complete an interagency Memorandum of Understanding (MOU) addressing periodic corridor reviews; (2) update agency guidance; (3) update agency training; and (4) complete a Corridor Study. In fulfillment of the Settlement Agreement, an MOU was executed in 2013. The MOU includes a Work Plan for the Regional Periodic Reviews. The Agencies also approved a Work Plan for the Corridor Study.

Corridor Study

In May 2016, a Corridor Study was released that examined whether the Corridors are achieving their purpose to promote environmentally responsible corridor-siting decisions and to reduce proliferation of dispersed rights-of-way crossing federal lands. Reportedly, with the aim of encouraging more efficient and effective use of the Corridors, the Study establishes baseline data and presents opportunities and challenges for further consideration during the Periodic Regional Reviews. Issues identified include modifications to the Corridors, congestion, interagency operating procedures, better agency coordination, Corridor gaps, and incorporation of new information.

Regional Reviews

The Agencies began their Regional reviews in October 2016. According to the Agencies, the outcome of the Regional Reviews would be the development of recommendations for specific corridor additions, deletions, or alterations where warranted. An interim step to the recommendations was an initial analysis of opportunities and constraints. Corridor abstracts were developed to specify opportunities and concerns as well as identify which

Corridors effectively meet current and projected energy needs and which fall short either due to limited remaining capacity, poor placement, or other considerations.

Corridor Abstracts

The Corridors were divided into five regions. Region 1 (partly located in the southern end of the Highway 395 corridor, in Inyo County) was the first to be evaluated and the County sent comments regarding the Region 1 Abstracts . As part of the Region 1 comments, the County repeated its request for coordination with the BLM, especially with regard to, what was then, an upcoming review of Region 5's Corridor No. 18-23, due to the sensitivity of its possible location in Inyo County.

In March of 2019, Corridor 18-23 was evaluated and the Board provided comments (Attachment 2). Corridor 18-23 runs through Inyo County, beginning roughly north of Pearsonville and ending at the Mono/Inyo County line (Map-Attachment 3). A section of the 18-23 Corridor was identified within the newly designated Alabama Hills National Scenic Area (NSA) (Map-Attachment 4) from mileposts 184-192. This is likely due to the fact that the existing transmission infrastructure veers off of federally managed lands and onto Los Angeles Department of Water and Power owned lands. The mandate of the 368 Corridor project is to identify areas on Federal lands for the conveyance of energy resources. This does not, however, make the impact of a potential electric transmission line spanning across the Alabama Hills NSA any less. Corridor 18-23 continues on the west side of Highway 395 to the north, to just south of the Manzanar National Historic Site (milepost 178). This section, although outside of the NSA, would still be greatly impacted with regard to the County's visual resources by transmission lines. The Board's March 2019 comment letter addressed these issues and mentioned again the County's Renewable Energy General Plan Amendment policy limiting increases to transmission through the County.

Public stakeholder workshops were held in June and July 2019 to take comments and engage in conversations related to the corridors. In November 2020 the Agencies released the Regions 4, 5 and 6 Report (Attachment 6 - Report and supporting documents). Possible revision suggestions were made based on the feedback the Agencies received by comment letters and the workshops. With regard to Region 5 and the 18-23 corridor, the County's comments have been addressed. The revision to the 18-23 corridor includes realigning it to collocate with the energy conveyance lines located to the east. This would keep the line from interfering with the Alabama Hills NSA and the Manzanar National Historic Site. The Report also includes a reference to the County's Renewable Energy General Plan Amendment's limitations on additional electrical conveyance through the County.

Draft Correspondence

Staff has reviewed the Report and prepared a comment letter for the Board's consideration. It encourages the potential revisions to the 18-23 corridor as presented in the Report and reiterates the impact that not making these changes will have to the County's visual resources. The letter also spells out the importance of any conveyance planning in the County follow the REGPA, especially with regard to any possible planning for lines coming from Nevada (18-224 corridor) into Bishop to connect to the 18-23 corridor.

Staff is asking for feedback on the draft letter and direction from the Board to send it.

BACKGROUND/HISTORY OF BOARD ACTIONS:

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

The Board could direct staff to make modifications to the correspondence, or to not submit comments.

OTHER AGENCY INVOLVEMENT:

FINANCING:

General funds are utilized to monitor federal planning efforts.

ATTACHMENTS:

1. Inyo County Draft Comments 18.23 Corridor 12.15.2020
2. 20190402Planning- West-wideEnergyCorridorsRegion5CommentLetter
3. 368 Corridor Inyo County
4. 368 Corridor with NSA
5. Regions_4-5-6_Draft_Report
6. Regions_4-5-6_Summaries
7. Regions_4-5-6_Appendices

APPROVALS:

Cathreen Richards
Darcy Ellis
Cathreen Richards

Created/Initiated - 12/7/2020
Approved - 12/7/2020
Final Approval - 12/18/2020



BOARD OF SUPERVISORS COUNTY OF INYO

P. O. DRAWER N • INDEPENDENCE, CALIFORNIA 93526
TELEPHONE (760) 878-0373
email: dellis@inyocounty.us



December 15, 2020

Department of the Interior
Department of Agriculture
Department of Energy
blm_wo_368corridors@blm.gov

Re: West-wide Energy Corridor Region 4, 5 and 6 Draft Report

Agencies:

On behalf of the Inyo County Board of Supervisors, I would like to thank the Agencies for the opportunity to comment on the Draft Report for Regions 4, 5 and 6 (specifically Region 5) of the Section 368 Energy Corridors. We believe that coordination is of the utmost importance in this planning process and appreciate the recent coordination between the Bureau of Land Management and the County. We hope that this continues as this project is completed and with any future projects related to it.

In response to the Report, with respect to Region 5, we are happy to see Inyo County's Renewable Energy General Plan Amendment's (REGPA) restriction on additional transmission, beyond what is outlined within it, included in the Local Initiatives and Potential Future Development Section. We are also pleased to find references to corridor locations at or near Solar Energy Development Areas (SEDA) as identified in the REGPA, particularly Rose Valley and Owens Lake. We are hopeful that the REGPA policies addressing additional transmission are adhered to as the development of those policies went through an extensive public input process and reflect Inyo County citizens' preferences. Any plans to convey electricity from the east (e.g. 18-224 corridor) to tie into the 18-23 corridor should not be pursued as this would likely require more capacity than the REGPA sets forth.

We are relieved to see on the Summary of Potential Revisions, Deletions and Additions Table, the consideration of shifting the 18-23 Corridor to the east from mileposts 86-216. As we commented previously, a section of this, between mileposts 184-192, runs through the newly designated Alabama Hills National Scenic Area (NSA). A tremendous amount of hard work, that took years by a local grassroots effort, was put in to get this designation. Transmission lines running through the Alabama Hills NSA would not be compatible with the stated purpose of the NSA and would be an affront to the efforts in getting the designation. We support the use of the existing infrastructure located to the east to keep transmission lines off the west side of Highway 395. Visual resources are extremely important to the people who live in Inyo County and to the millions of annual visitors to the County. Impacts to these resources could have significant, negative, results on the County's tourist based economy.

Sincerely,

Matt Kingsley, Chairperson
Inyo County Board of Supervisors

If you have any questions, please contact the County's Administrative Officer, Clint Quilter, at (760) 878-0468 or cquilter@inyocounty.us.



BOARD OF SUPERVISORS COUNTY OF INYO

P. O. DRAWER N • INDEPENDENCE, CALIFORNIA 93526
TELEPHONE (760) 878-0373
email: dellis@inyocounty.us



April 2, 2019

Department of the Interior
Department of Agriculture
Department of Energy
blm_wo_368corridors@blm.gov

COPY

Re: West-wide Energy Corridor Regional Reviews – Abstract No. 18-23

West-Wide Energy Corridors Regional Review:

On behalf of the Inyo County Board of Supervisors, I wish to thank the Agencies for the opportunity to comment on the regional reviews of the Section 368 Energy Corridors Study. We believe that coordination is of the utmost importance in the Regional Reviews, and reaffirm our earlier requests for coordination between the Bureau of Land Management and the County. We would also like to point out that we are extremely disappointed with the Agencies lack of coordination with the County to this point in the process, as well as, the absence of communications. Inyo County found out about the release of the Corridor 18-23 abstract comment period only two weeks prior to the deadline - and not from the Agencies. In light of this, we would first like to request that the Agencies extend the comment period.

In response to the current review of Regions 4, 5, and 6 (specifically 5) by the Agencies, we restate that Inyo County's renewable energy planning should be considered in the Region 5 Reviews. In particular, the Renewable Energy General Plan Amendment¹ (REGPA) that we have adopted should be referenced in the abstract for Corridor 18-23 particularly with respect to the County policy regarding limitations on additional transmission capacity (please see pages 3, 7 of the REGPA). It should also be referenced for locations at or near Solar Energy Development Areas (SEDA) as identified in the REGPA.

The reviewing agencies should also be made aware of the newly designated Alabama Hills National Scenic Area (NSA). This designation was signed into law as part of S. 47 the Conservation, Management and Recreation Act, on March 12, 2019. The Alabama Hills NSA legislation has been consistently proposed in the many iterations of the California Desert Conservation Act and the California Minerals, Off-Road Recreation, and Conservation Act and has been strongly advocated for years. It is somewhat surprising it was not included in the Corridor 18-23 review, especially since it is located on land managed by the BLM. Based on this new NSA designation, milepost evaluations for 184-192 should be updated to include the NSA. The Alabama Hills NSA purpose statement is:

The purpose of the Scenic Area is to conserve, protect, and enhance for the benefit, use, and enjoyment of present and future generations the nationally significant scenic, cultural, geological, educational, biological, historical,

¹

Refer to <http://inyoplanning.org/projects/REGPA.htm>.

MEMBERS OF THE BOARD • DAN TOTHEROH • JEFF GRIFFITHS • RICK PUCCI • MARK TILLEMANS • MATT KINGSLEY
CLINT G. QUILTER • Clerk of the Board • DARCY ELLIS • Assistant Clerk of the Board

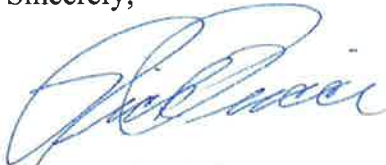
recreational, cinematographic, and scientific resources of the Scenic Area managed consistent with section 302(a) of the Federal Land Policy and Management Act of 1976.

Transmission lines running through the Alabama Hills NSA would not be compatible with the stated purpose of the NSA. Also, there are existing transmission lines located to the east of this area that are a continuation of lines that are listed under *Potential Resolution Bases on Siting Principle Analysis* as collocation with existing infrastructure opportunities, for areas to the south. We understand that at milepost 195 this existing transmission infrastructure veers east and off of federally managed lands, but we strongly urge you to look at the existing infrastructure as your first, if not only, option. It should also be noted that moving the proposed sections (milepost 178-195) anywhere to the west of the 18-23 Corridor, in an attempt to stay on Federal lands, would be completely inappropriate as this would be a serious detriment to the visual resources of the County, including the Alabama Hills NSA.

After reviewing the 18.23 Corridor, we strongly recommend that you adjust corridor 18-23 beginning at milepost 195 on the south to milepost 178 at the north, to the east, to co-locate with the existing transmission infrastructure whether it is on Federally managed lands or not, or leave this section empty similar to much of the rest of the 18-23 Corridor. No new transmission lines or corridors should be necessary or even considered when there is already existing infrastructure and/or right-of-ways in place. In addition, we also submit that any potential co-location should only be evaluated within the capacity parameters set forth in the County's Renewable Energy General Plan Amendment. This is an extremely sensitive issue to the people of Inyo County and the millions of annual visitors to the County who place a very high value on visual resources and where any impacts to these resources could have significant, negative, results on the County's tourist based economy.

Thank you. If you have any questions, please contact the County's Administrative Officer, Clint Quilter, at (760) 878-0468 or cquilter@inyocounty.us.

Sincerely,



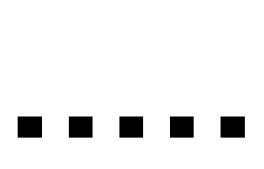
Rick Pucci, Chairperson
Inyo County Board of Supervisors

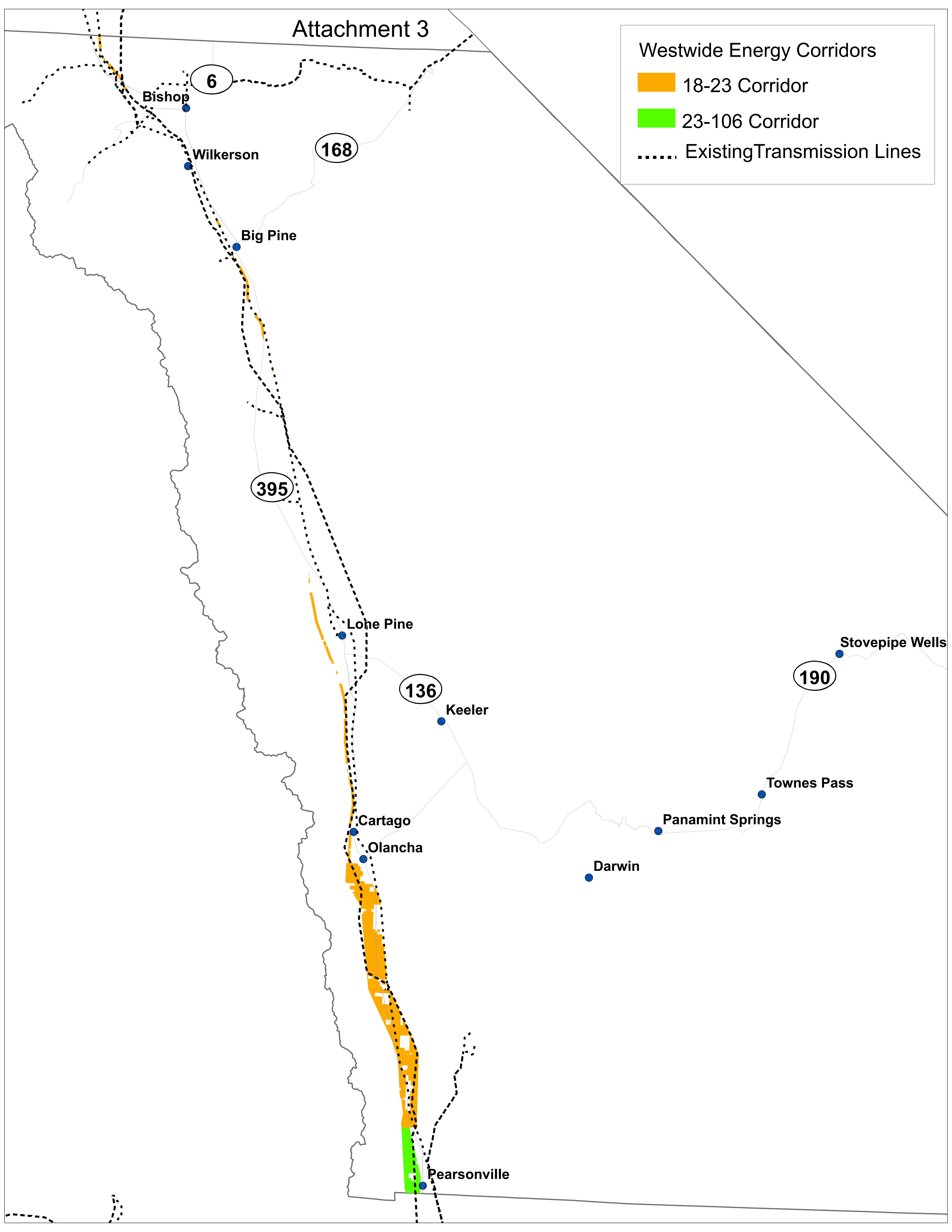
Attachment 3

Westwide Energy Corridors

 18-23 Corridor

 23-106 Corridor




 Existing Transmission Lines

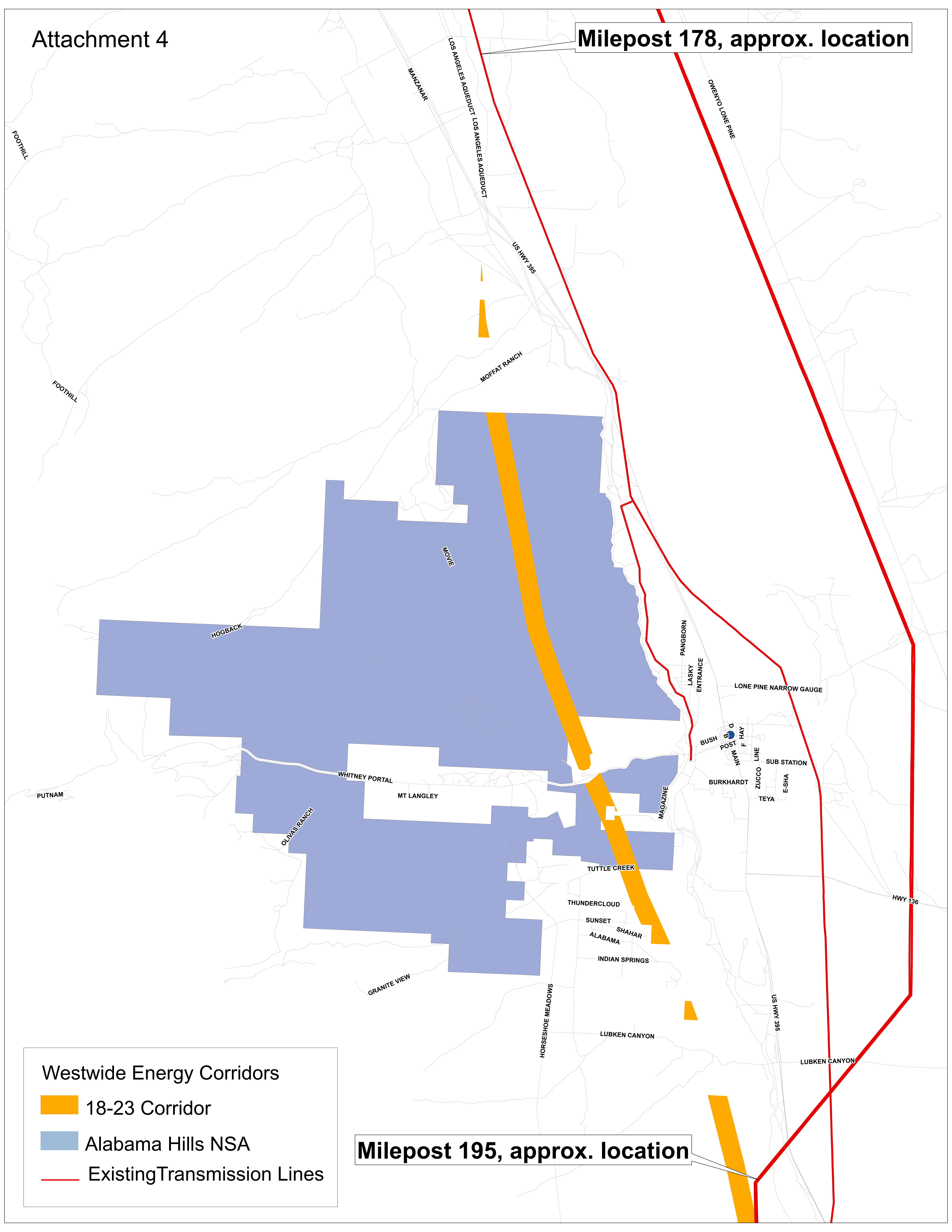


Milepost 178, approx. location

Milepost 195, approx. location

Westwide Energy Corridors

-  18-23 Corridor
-  Alabama Hills NSA
-  Existing Transmission Lines



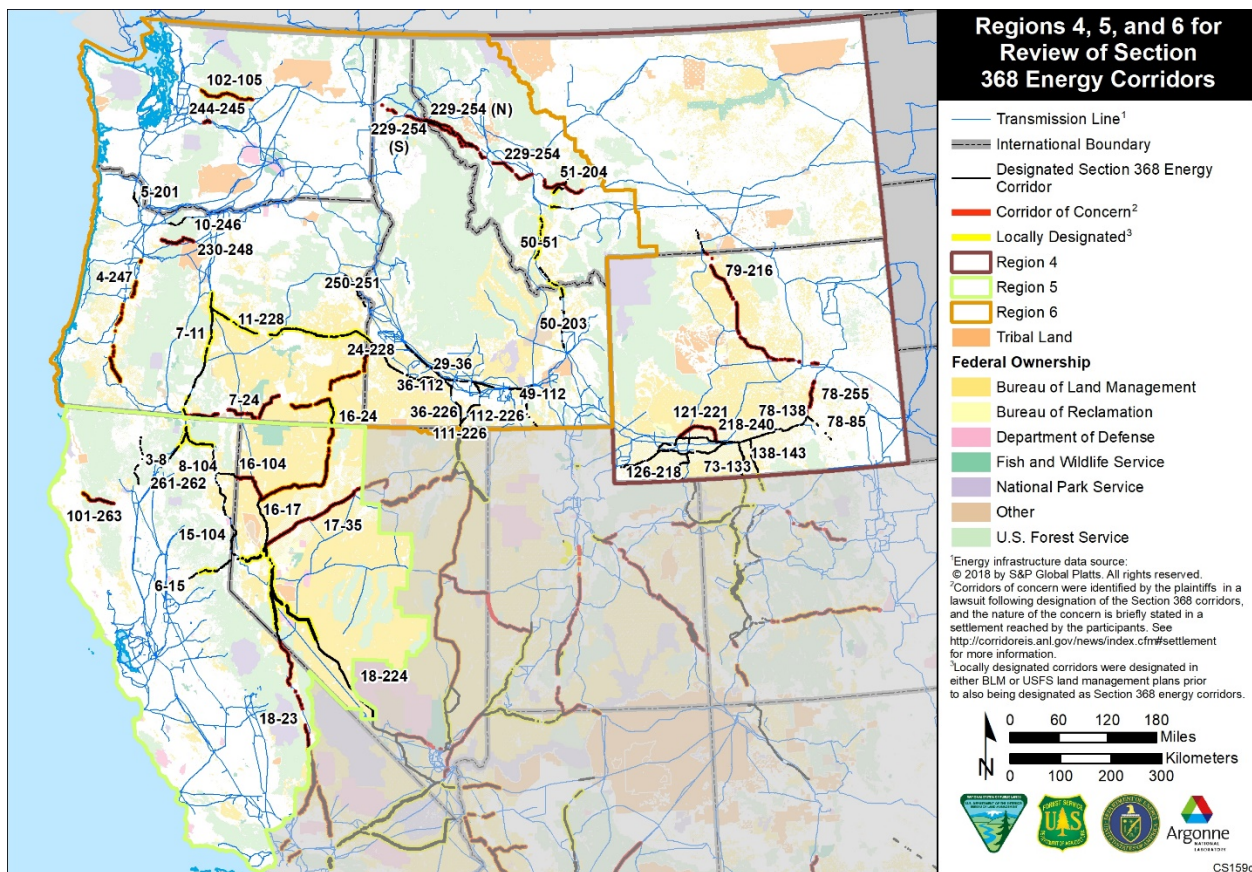
November 2020



Energy Policy Act of 2005

Section 368 Energy Corridor Review

REGIONS 4, 5, and 6



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Notation

Acronyms, Initialisms, and Abbreviations

ACEC	Area of Critical Environmental Concern	MTR	Military Training Route
ARMPA	Approved Resource Management Plan Amendment	NCA	National Conservation Area
		NEPA	National Environmental Policy Act
		NGO	non-governmental organization
BIA	Bureau of Indian Affairs	NHT	National Historic Trail
BLM	Bureau of Land Management	NPS	National Park Service
BMP	best management practices	NREL	National Renewable Energy Laboratory
BOR	Bureau of Reclamation		
		NSA	National Scenic Area
DoD	U.S. Department of Defense	NST	National Scenic Trail
DOE	U.S. Department of Energy		
DOI	U.S. Department of the Interior	OHV	off-highway vehicle
DRECP	Desert Renewable Energy Conservation Plan	PEIS	Programmatic Environmental Impact Statement
		PHMA	Priority habitat management area
EIR	Environmental Impact Report	PV	photovoltaic
EIS	Environmental Impact Statement		
EPA	U.S. Environmental Protection Agency	REDA	Renewable Energy Development Area
EPAct	Energy Policy Act of 2005	RMP	Resource Management Plan
ESA	Endangered Species Act	RNA	Recreation Natural Area
		ROD	Record of Decision
FLPMA	Federal Land Policy and Management Act	ROW	right-of-way
		SEDA	Solar Energy Development Area
GIS	geographic information system	SEZ	solar energy zone
GHMA	general habitat management area	SRMA	Special Recreation Management Area
GPA	General Plan Amendment	SUA	Surface Use Area
GRSG	Greater Sage-grouse		
		USDA	U.S. Department of Agriculture
IHMA	Idaho Habitat Management Area	USFS	U.S. Forest Service
IOP	Interagency Operating Procedure	USFWS	U.S. Fish and Wildlife Service
IR	Instrument Route		
		VQO	Visual Quality Objective
LMP	Land Management Plan	VR	Visual Route
LMPA	Land Management Plan Amendment	VRM	Visual Resource Management
LNG	liquefied natural gas		
LUPA	Land Use Plan Amendment	WPCI	Wyoming Pipeline Corridor Initiative
		WSA	Wilderness Study Area
MFP	Management Framework Plan	WSR	Wild and Scenic River
MOU	Memorandum of Understanding		
MP	milepost		

Units of Measure

ft	foot, feet
km ²	square kilometer(s)
kV	kilovolt(s)
m	meter(s)
mi ²	square mile(s)
MW	megawatt(s)

Executive Summary

On behalf of the Section 368 Interagency Workgroup, comprising the Bureau of Land Management (BLM), the U.S. Forest Service (USFS), and the U.S. Department of Energy (DOE), and in response to the 2012 Settlement Agreement, this third report is presented for the purpose of supporting enhancements to the West-wide energy corridor network across the western United States. The Settlement Agreement did not change or nullify designated energy corridors, but it did provide four foundational principles which were to be applied within a corridor review process, as has been done here. This review process was performed collaboratively with State and tribal governments, the energy industry, non-governmental organizations, local communities, and other Federal agencies. The findings will be used to improve the West-wide energy corridor network, thereby advancing the Presidential priority of improving the Federal environmental review and permitting for infrastructure projects as outlined in Executive Order 13807.

The Regions 4, 5, and 6 review evaluated energy corridor placement on Federal lands managed by both the BLM and the USFS across northern California, Idaho, Montana, western Nevada, Oregon, Washington, and Wyoming. In compliance with the Settlement Agreement, BLM, USFS, and DOE (“the Agencies”) identified opportunities for potential energy corridor revisions, deletions, and additions for consideration during future land use planning at the local level. The specific findings are found in Section 3, Table 3-1, of this report and are summarized as follows: 45 potential corridor revisions; 4 potential corridor deletions (two in Wyoming, one in California and Nevada, and one in Oregon); and 3 potential corridor additions (two in Wyoming and one in Oregon). The corridor summaries detail the findings related to each corridor, including potential corridor revisions, deletions, and additions. The potential corridor revisions, deletions, and additions reflect application of the corridor siting principles and appropriately balance the need for safe and reliable energy connectivity with concerns for potential resource impacts on BLM-managed public lands and USFS-managed National Forest System lands.

The Section 368 Interagency Workgroup also identified one potential addition to the interagency operating procedures (IOPs), which are best management practices for improving consistency across the BLM and USFS in processing applications for use of Section 368 energy corridors. In addition, the Section 368 Interagency Workgroup identified additional language for two potential new IOPs identified in the reports for Region 1 and Regions 2 and 3, and one potential revision to an existing IOP. The potential additions and revisions to the IOPs are presented in Section 3.4.1 of this report.

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1. Purpose, Scope, and Background

During the Section 368 energy corridor review for Regions 4, 5, and 6, the Bureau of Land Management (BLM), the U.S. Forest Service (USFS), and the U.S. Department of Energy (DOE), hereafter referred to collectively as “the Agencies,” analyzed 59 energy corridors (commonly referred to as Section 368 energy corridors or West-wide energy corridors) located in Regions 4, 5, and 6, which include northern California, Idaho, Montana, western Nevada, Oregon, Washington, and Wyoming (Figure 1-1). This report specifically identifies and describes 45 potential corridor revisions, 4 potential corridor deletions, and 3 potential corridor additions that local BLM and USFS land managers should consider through future land use planning processes. Additionally, the Agencies present one potential addition to the interagency operating procedures (IOPs), additional language for the two potential new IOPs identified in the reports for Region 1 and Regions 2 and 3, and one potential revision to an existing IOP.¹

1.1 Purpose and Scope

The purpose of the Section 368 energy corridor regional reviews is to examine current relevant information and stakeholder input on the corridors, including corridors of concern,² and based on this information identify potential revisions, deletions, or additions to the corridors and potential IOP revisions, deletions, or additions. The first report covering Region 1 was released for 30-day public review on June 20, 2019, and the report covering Regions 2 and 3 was released for a 30-day public review on August 22, 2019. The two reports included potential corridor and IOP revisions, deletions, and additions. This report presents revisions, deletions, and additions for Regions 4, 5, and 6.

Abstracts for each Section 368 energy corridor in Regions 4, 5, and 6 were developed to assist the Agencies and stakeholders in identifying specific environmental concerns and other challenges, such as pinch points.³ The abstracts allow for review of each corridor within the framework of the corridor siting principles, as listed in Section 1.2.2. The Agencies used geographic information system (GIS) analyses to evaluate possible physical constraints and resource conflicts, as well as input from stakeholders and other available data. The abstracts provide a condensed record of environmental and other concerns for each corridor. The Agencies considered the condensed record of environmental and other concerns identified through this review process in the context of resource management goals and objectives in applicable BLM and USFS land use plans to determine whether these resource management goals and objectives were compatible with the desired future conditions of the Section 368 energy corridors (i.e., responsible linear infrastructure development with minimization of impacts). The abstracts identify which Section 368 energy corridors effectively meet current and projected energy needs and which fall short due to limited build-out capacity, site-specific conflicts, or other considerations. Figure 1-2 displays the Section 368 energy corridor regional review process, including developing the abstracts from multiple information sources utilizing an analysis framework, conducting workshops, and drafting the Regions 4, 5, and 6 Report.

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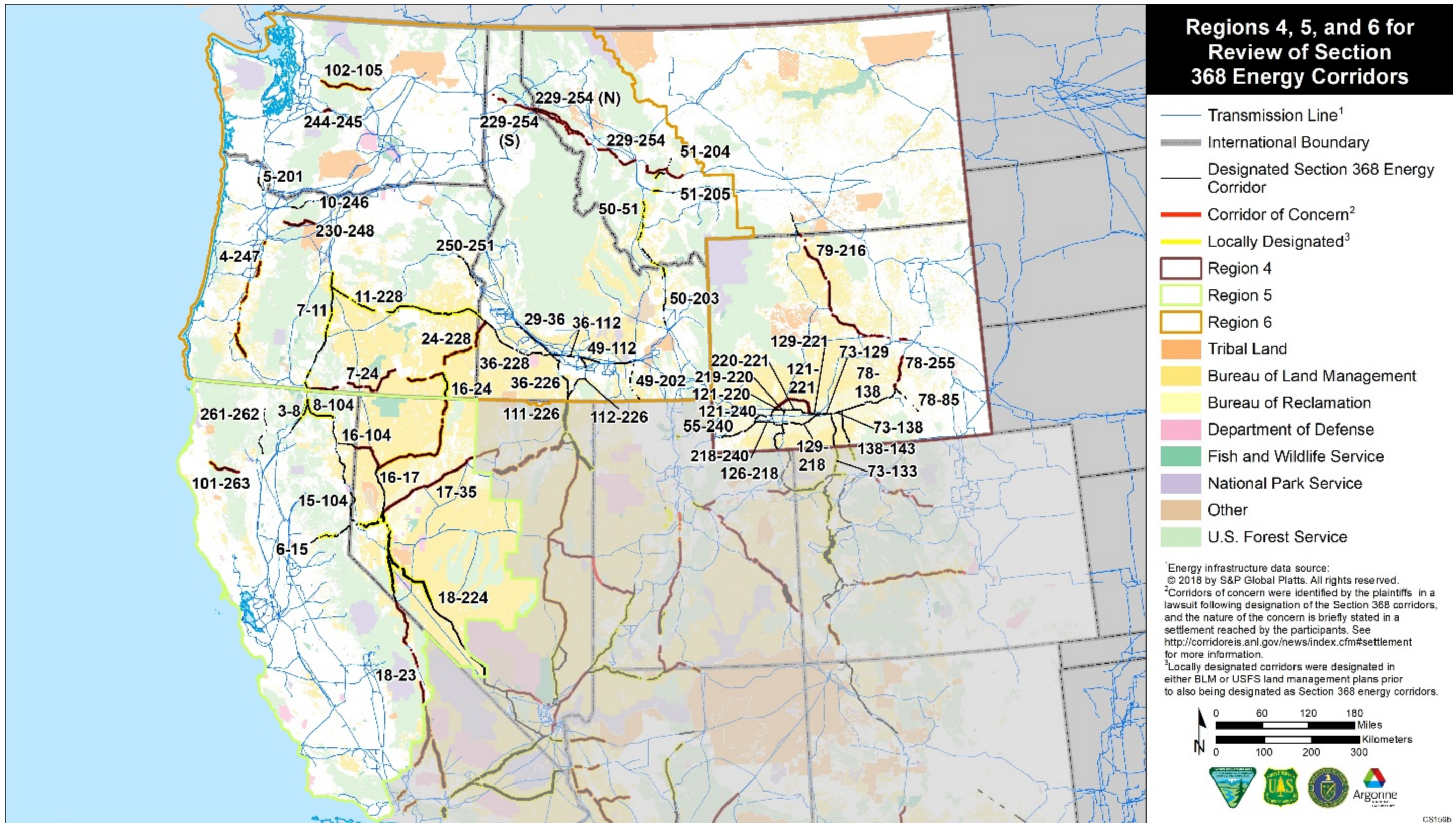


Figure 1-1 Section 368 Energy Corridors in Regions 4, 5, and 6

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SECTION 368 REGIONAL REVIEWS FOR REGIONS 4,5, & 6 – PROCESS GRAPHIC

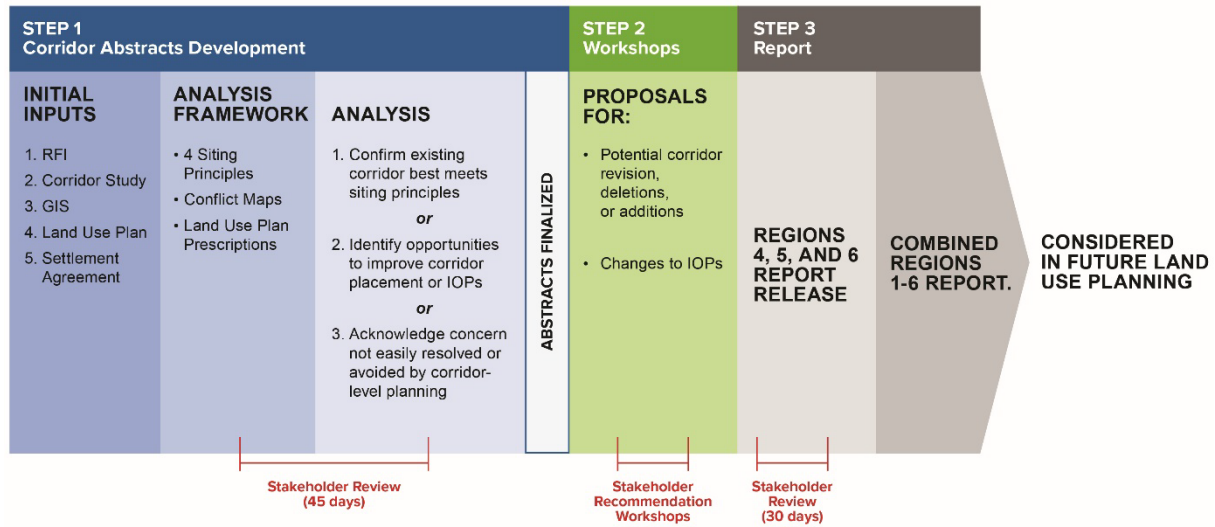


Figure 1-2 Section 368 Energy Corridor Review Process — Regions 4, 5, and 6

1.1.1 Potential Corridor Revisions, Deletions, or Additions

As described above, one component of this regional review is to identify potential revisions, deletions, or additions to Section 368 energy corridors. Corridor abstracts include details used to develop potential corridor revisions, deletions, or additions for consideration in future land use planning decisions including (1) during the normal course of land use plan revisions; (2) during an amendment to a land use plan caused by a specific project proposal that does not conform to a land use plan, or when issues within a designated Section 368 energy corridor necessitate review of an alternative corridor path; or (3) during an amendment to individual land use plans specifically to address corridor changes. Corridor summaries (Regions 4, 5, and 6: Interagency Corridor Modification Summaries, Potential Corridor Revisions, Deletions, and Additions) detail potential revisions, deletions, or additions, or — if none are identified for a corridor — describe how the current location of the corridor meets the four siting principles identified in the Settlement Agreement (see Section 1.2.2).

Examples of potential corridor revisions include:

- Slight corridor alignment adjustments to avoid a specific area (e.g., an Area of Environmental Concern [ACEC], National Historic Trail [NHT], or other sensitive resource) where a more favorable route is available;
- Corridor adjustments to better align with existing or planned infrastructure to minimize infrastructure sprawl;
- Corridor adjustments (including modifications to corridor width) to create greater capacity within the corridor where additional capacity needs are reasonably anticipated; and
- Changes to designated use within a corridor (multi-modal, electric only, underground only).⁴

Examples of potential corridor deletions or additions include:

- Shortening a section of corridor or eliminating a corridor or corridor segment that does not meet the siting principles (i.e., corridor contains no existing infrastructure and does not serve as a preferred pathway to support energy transmission); and
- Addition of new corridors or corridor sections to better align with energy demand (including potential renewable energy generation sites) along existing or planned infrastructure and to increase connectivity to other West-wide energy corridors.

1.1.2 Corridor Management

In reviewing the energy corridors, the Agencies observed a need for improved clarity and consistent guidance for managing existing corridors to ensure they continue to meet the siting principles through subsequent amendments to land use plans. Section 3.3 notes that in addition to identifying appropriate and acceptable uses, as required upon designation, it would also be beneficial to identify inappropriate and unacceptable uses within corridors (e.g., nonlinear features such as geothermal and solar energy facilities). This approach would provide more comprehensive guidance regarding the corridor's intended purpose. Specific issues to address through BLM and USFS land use planning are identified in the corridor summaries in this report. These issues include situations where land management prescriptions conflict with the purpose of Section 368 energy corridors as the preferred location for energy transport across Federal lands managed by the BLM or the USFS.

The Energy Policy Act of 2005 (42 U.S.C. 15926) requires that “[a] corridor designated under this section shall, at a minimum, specify the centerline, width, and compatible uses of the corridor.” Settlement Agreement Siting Principle #3 states that “[a]ppropriate and acceptable uses are defined for specific corridors.”⁵ In 2009, the BLM and USFS issued Records of Decision (RODs) designating energy corridors and identifying their centerline, width, and compatible uses.^{6 7} Compatible use was defined as multi-modal, pipeline only, transmission only, and potential inclusion of limits on above- or below-grade use.

1.1.3 IOPs

As part of the Settlement Agreement, this regional review also assesses the IOPs, which were established in the 2009 RODs and are best management practices (BMPs) for processing applications for use of Section 368 energy corridors across the BLM and USFS. The Agencies reviewed the IOPs and assessed the need to update them to better address concerns within the Section 368 energy corridors. Section 3.4 of this report describes one potential new IOP, additional language for the two potential new IOPs identified in the reports for Region 1 and Regions 2 and 3, and one potential revision to an existing IOP. Any changes to IOPs would be adopted through an amendment to the West-wide Energy Corridor Programmatic Environmental Impact Statement (PEIS) and records of decision signed by the U.S. Department of the Interior and the U.S. Department of Agriculture if determined to be appropriate. In lieu of amendments to the PEIS, the potential new IOPs and IOP revisions should be adopted as best management practices in local land use plans or at the project level to minimize potential impacts. The corridor summaries identify resource concerns within each Section 368 energy corridor or potential

corridor revisions, deletions, or additions that could be mitigated with the adoption of potential new IOPs or IOP revisions.

1.1.4 Stakeholder Process

The regional review process includes robust stakeholder engagement to identify concerns and develop solutions through potential revisions, deletions, or additions to Section 368 energy corridors. Agency stakeholder engagement included but was not limited to:

- Tribal governments;
- State governments;
- County governments;
- Plaintiffs in the litigation giving rise to the Settlement Agreement (see Section 1.2.2 of this report);
- Non-governmental organizations (NGOs);
- U.S. Department of Defense (DoD), U.S. Fish and Wildlife Service (USFWS), National Park Service (NPS), Bureau of Indian Affairs (BIA), Bureau of Reclamation (BOR), and other Federal agencies;
- The energy industry (e.g., utilities, transmission and pipeline companies, power project generators, and regional transmission planning entities);
- Private landowners; and
- Members of the public.

Stakeholder engagement occurred in three stages, indicated in red text in Figure 1-2. Stakeholders provided input through interactive webinars, in-person meetings and workshops, telephone calls, e-mails, and web-based submissions. The Agencies apprised stakeholders of current information via project website updates providing access to a variety of corridor-related information, including archived documents from the West-wide Energy Corridor PEIS, Corridor Study, and Settlement Agreement. The website continues to be updated periodically as the regional review process progresses and will be available for use in BLM and USFS land use planning following completion of the regional reviews.

1.1.5 Available Tools

Several tools were developed to facilitate stakeholder understanding of and input on the regional review process. These tools include corridor abstracts, the Section 368 Energy Corridor Mapping Tool, and a web-based form for receiving stakeholder input on the regional review process and the Section 368 energy corridors. These tools are available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

1.2 Background

1.2.1 West-wide Energy Corridor PEIS

Section 368 of the Energy Policy Act of 2005 (EPAct) mandates that the U.S. Department of the Interior (DOI) and the U.S. Department of Agriculture (USDA) designate energy corridors for potential placement of future oil, gas, and hydrogen pipelines and electricity transmission and distribution infrastructure. The Agencies prepared a PEIS and the BLM and USFS signed RODs in 2009 designating approximately 5,000 miles of Section 368 energy corridors on BLM-administered lands and approximately 1,000 miles of Section 368 energy corridors on USFS-administered lands. The PEIS, RODs, and related documents are available on the project website at www.corridoreis.anl.gov/eis/guide/index.cfm.

1.2.2 Lawsuit and Settlement Agreement

On July 7, 2009, several plaintiffs⁸ filed a lawsuit against the Agencies in United States District Court alleging that the energy corridor PEIS and RODs violated the EPAct, National Environmental Policy Act (NEPA), Endangered Species Act (ESA), the Federal Land Policy and Management Act (FLPMA), and the Administrative Procedure Act.

On July 3, 2012, the Agencies entered into a settlement agreement with the plaintiffs (Settlement Agreement). The Settlement Agreement required the Agencies to conduct regional reviews of the designated Section 368 energy corridors, among other stipulations, and to establish an interagency memorandum of understanding (Interagency MOU) to outline the Agencies' process for conducting regional reviews, guided by four siting principles outlined in the Settlement Agreement.

The regional reviews are intended to evaluate the Section 368 energy corridors for any potential revisions, deletions, and additions utilizing the following four siting principles from the Settlement Agreement as a framework:

1. Corridors are thoughtfully sited to provide maximum utility and minimum impact on the environment;
2. Corridors promote efficient use of the landscape for necessary development;
3. Appropriate and acceptable uses are defined for specific corridors; and
4. Corridors provide connectivity to renewable energy generation to the maximum extent possible while also considering other sources of generation, in order to balance the renewable sources and to ensure the safety and reliability of electricity transmission.

Additional information on the Settlement Agreement can be found on the project website at <http://corridoreis.anl.gov/regional-reviews/settlement/>.

1.2.3 Corridor Study

The Settlement Agreement requires the Agencies to perform a corridor study to evaluate how well the Section 368 energy corridors are achieving their intended purpose of promoting environmentally responsible right-of-way (ROW) siting decisions and reducing the proliferation of dispersed ROWs across Federal lands.⁹ The corridor study assessed the utilization of Section 368 energy corridors since their designation in 2009 and established current baseline data to be used in the regional reviews. The corridor study covered January 2009 to October 2014. Findings from the corridor study are located on the project website at <http://corridoreis.anl.gov/regional-reviews/corridor-study/>.

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2. Regions 4, 5, and 6 Review

2.1 Current Energy Conditions and Projected Growth

Energy corridors exist to provide reliable energy transmission pathways for local and national growth. Two of the corridor siting principles in the Settlement Agreement are to consider whether the Section 368 energy corridors are thoughtfully sited to promote maximum utility and minimum impact on the environment and whether the corridors promote efficient use of the landscape for necessary development. Consistent with these siting principles, the Regions 4, 5, and 6 review assessed existing energy infrastructure, planned or future energy development potential, and additional energy transmission capacity in the Regions 4, 5, and 6 Section 368 energy corridors.

Most of the 59 energy corridors in Regions 4, 5, and 6 that the Agencies designated in 2009 had preexisting energy transmission infrastructure. By the very nature of utility-scale energy generation technology previous to 2009 energy corridor designations, the existing infrastructure had been largely commissioned to transport fossil-fuel, nuclear and hydroelectric energy. Since 2009, additional infrastructure has been constructed within the Section 368 energy corridors, and many corridors have pending ROW applications for other primary energy transportation sources, including utility-scale renewable energy sources (Figure 2-1). Appendix A contains a description of the existing infrastructure, planned or pending projects, and the potential for future energy development in the Regions 4, 5, and 6 Section 368 energy corridors. The Agencies utilized that information in this review to determine available capacity for development in those corridors.

A third siting principle in the Settlement Agreement is to consider whether Section 368 energy corridors provide connectivity to renewable energy generation to the maximum extent possible while also considering other sources of generation, in order to balance the renewable sources and to ensure the safety and reliability of electricity transmission. Stakeholders in the Regions 4, 5, and 6 review indicated strong interest in developing renewable energy. Renewable energy development in Section 368 energy corridors is critical for connecting renewable energy sources to the grid. Section 2.1 of this report describes initiatives and studies investigating future energy potential and associated electrical and pipeline transmission needs, including renewable energy (Sections 2.1.1, 2.1.2, and 2.1.3).

2.1.1 Regional Initiatives and Studies

NREL Synthesis Study

The BLM commissioned the National Renewable Energy Laboratory (NREL) to prepare a report synthesizing information from multiple studies forecasting western energy generation and transmission needs over the next 10 to 15 years.¹⁰ Factors that may affect energy generation and consumption in the western region include changing generating mix, state and Federal policies, decreasing costs of natural gas and renewable energy generation, and market evolution.

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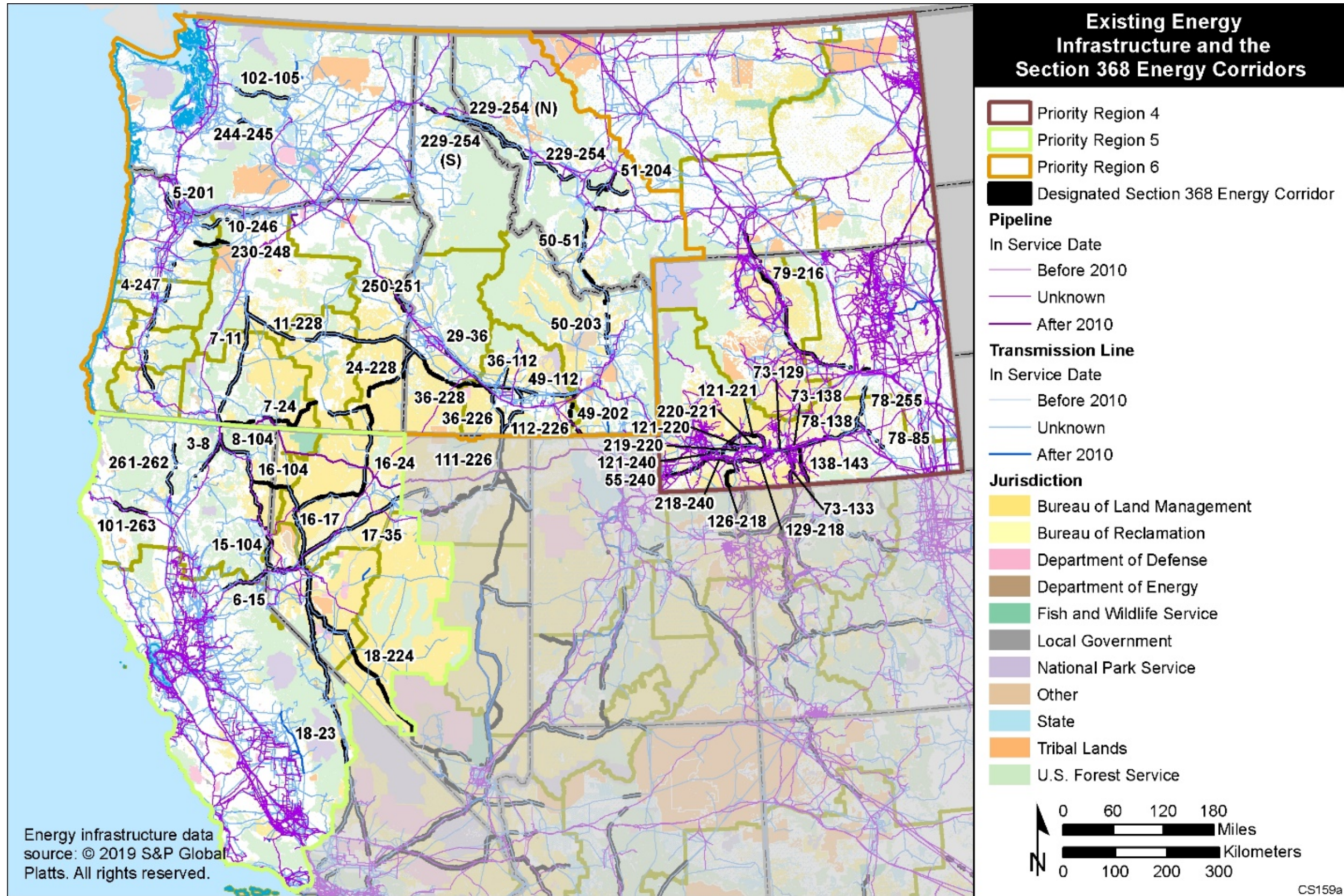


Figure 2-1 Existing Energy Infrastructure and the Regions 4, 5, and 6 Section 368 Energy Corridors

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The NREL study focused on Regions 2 and 3, however, general conclusions were made that under the 2026 common case (or expected future) scenario, there was minimal projected congestion and even projected decreases in congestion on paths from Utah to California and from the Pacific Northwest to California).¹¹ Factors supporting this finding included preference from developers to build gas-fired generation near load centers; renewable resource generation in state with access to local transmission; and planned transmission projects under development that will largely meet projected future transmission demands.

Solar Energy Development PEIS

In 2012, the BLM created a Solar Energy Program for utility-scale solar energy development on BLM-administered lands in six southwestern states.^{12 13} Through land use plan amendments, the BLM designated seventeen solar energy zones (SEZs) and additional solar variance areas in Arizona, California, Colorado, New Mexico, Nevada, and Utah.¹⁴ The SEZs are priority areas for solar energy and associated transmission infrastructure development that have been established to facilitate near-term, utility-scale solar energy development on BLM-administered lands; minimize potential negative environmental impacts; and optimize existing transmission infrastructure and energy corridors. The following SEZs are close to (within 20 miles of) Regions 4, 5, and 6 Section 368 energy corridors:

- Amargosa Valley SEZ, Nevada, adjacent to Corridor 18-224 (milepost (MP) 225 to MP 226).
- Gold Point SEZ, Nevada, approximately 20 miles east of Corridor 18-224 (MP 96).
- Millers SEZ, Nevada, approximately 7 miles west of Corridor 18-224 (MP 163).

BLM West-wide Wind Mapping Project

In 2016, the BLM conducted a reassessment of suitability of BLM-managed lands for wind energy development based on multiple changes that had occurred since issuance of the ROD for implementation of the Wind Energy Programmatic EIS in 2005,¹⁵ such as issuance of land use plan amendments for the Greater Sage-grouse (GRSG), issuance of the Desert Renewable Energy Conservation Plan in California,¹⁶ and reversal of the blanket exclusion of ACECs from wind energy development¹⁷ (BLM Instruction Memorandum 2009-043). The reassessment produced updated maps showing BLM-administered lands that are excluded from wind energy development, as well as additional environmentally sensitive areas with respect to wind energy development (lands with high or moderate levels of siting considerations). The results of the reassessment are summarized in a report and associated maps for specific areas of interest, which are posted at <https://bogi.evs.anl.gov/wwmp/portal/>.

2.1.2 State Energy Conditions and Future Energy Potential

Current Energy Conditions

Table 2-1 lists the net energy generation by energy source for states located in Regions 4, 5, and 6. Renewable energy accounts for a significant portion of energy generation in Regions 4, 5, and 6, particularly in California and Idaho. Wyoming currently has the largest amount of energy generation from coal, but almost 10 percent of the state's total energy generation comes from wind energy and

there is anticipated potential for additional wind energy. Hydroelectric power accounts for most of the energy generation in Washington and more than half of the energy generation in Idaho and Oregon.

Table 2-1 2017 Net Generation by State (% total)¹⁸

State	Coal	Natural Gas	Nuclear Energy	Renewable resources (hydroelectric power)	Renewable resources (solar, wind, geothermal, biomass)
California	0.14	43	9	21	26
Idaho	0.13	18	0	61	20
Montana	49	1.5	0	39	8
Nevada	5	70	0	5	21
Oregon	3	24	0	61	12
Washington	5	9	7	71	8
Wyoming	86	2		2	9

Renewable Energy Potential in Regions 4, 5, and 6

Nevada and California - There are several SEZs near Corridor 18-224 in the Region 5 portion of Nevada that could serve as areas for future renewable energy development. There is also a strong interest in solar energy development, combined with substantial existing geothermal energy production in this area. However, a lack of transmission lines to transport solar or geothermal energy to load centers presents a barrier for potential developers. Existing substations in the Bishop, California, area (near Corridor 18-23) are a preferred hub to move solar energy in and out of the area to load centers. California energy demand is high, and the state’s renewable portfolio standard requires all electric load-serving entities to procure 60% of their electricity portfolio from eligible renewable energy resources by 2030, making renewable energy development in Nevada critical to serve California demand.¹⁹

Oregon - There is significant wind, geothermal, and solar energy potential near Wagon Tire Mountain near three Section 368 energy corridors (east-west Corridors 11-228 and 7-24, and north-south Corridor 7-11). However, renewable energy resources require an additional north-south pathway east of Corridor 7-11 into California. A corridor addition in the area could serve to connect renewable energy to demand.

Wyoming - There are significant wind resources in Wyoming, but not enough transmission lines to accommodate potential future development. There are currently 1,488 MW of installed capacity and approximately 3,000 MW under construction.²⁰ The Energy Gateway West Transmission Project (see Section 2.1.5 and Figure 2-3) is under construction and is being built to alleviate some of this need for transmission facilities. In the future, additional infrastructure may be needed to transmit wind energy from Wyoming to out-of-state load centers, and Section 368 energy corridors could be well-placed to accommodate that need.

Wyoming Pipeline Corridor Initiative

The Wyoming Pipeline Corridor Initiative (WPCI) is a pipeline ROW network proposed by the Wyoming Pipeline Authority. The goal of the proposed pipeline ROW network is to meet future CO₂ pipeline needs for oil extraction in Wyoming by establishing approximately 1,150 miles of pipeline corridor on Federal lands in nine BLM-managed areas, as well as across smaller areas of lands managed by the USFS, Bureau of Reclamation, and DoD. Figure 2-2 shows the location of the proposed WPCI pipeline ROW network relative to the designated Section 368 energy corridors. The proposed pipeline network would not be limited to CO₂ conveyance, but could eventually accommodate oil, natural gas and the byproducts of these industries, as well as meet anticipated needs for CO₂-based enhanced oil recovery.²¹

This regional review considered the proposed location of WPCI ROWs and in the context of Section 368 energy corridors in Wyoming. The proposed WPCI ROWs are located within the entire length of six Section 368 energy corridors and are parallel to or overlap part of six additional Section 368 energy corridors. The Agencies have identified 2 corridors that could be revised to better align with the proposed WPCI ROWs. Potential revisions, deletions, and additions to Regions 4, 5, and 6 Section 368 energy corridors can be found in Table 3-1 and in the corridor summaries.

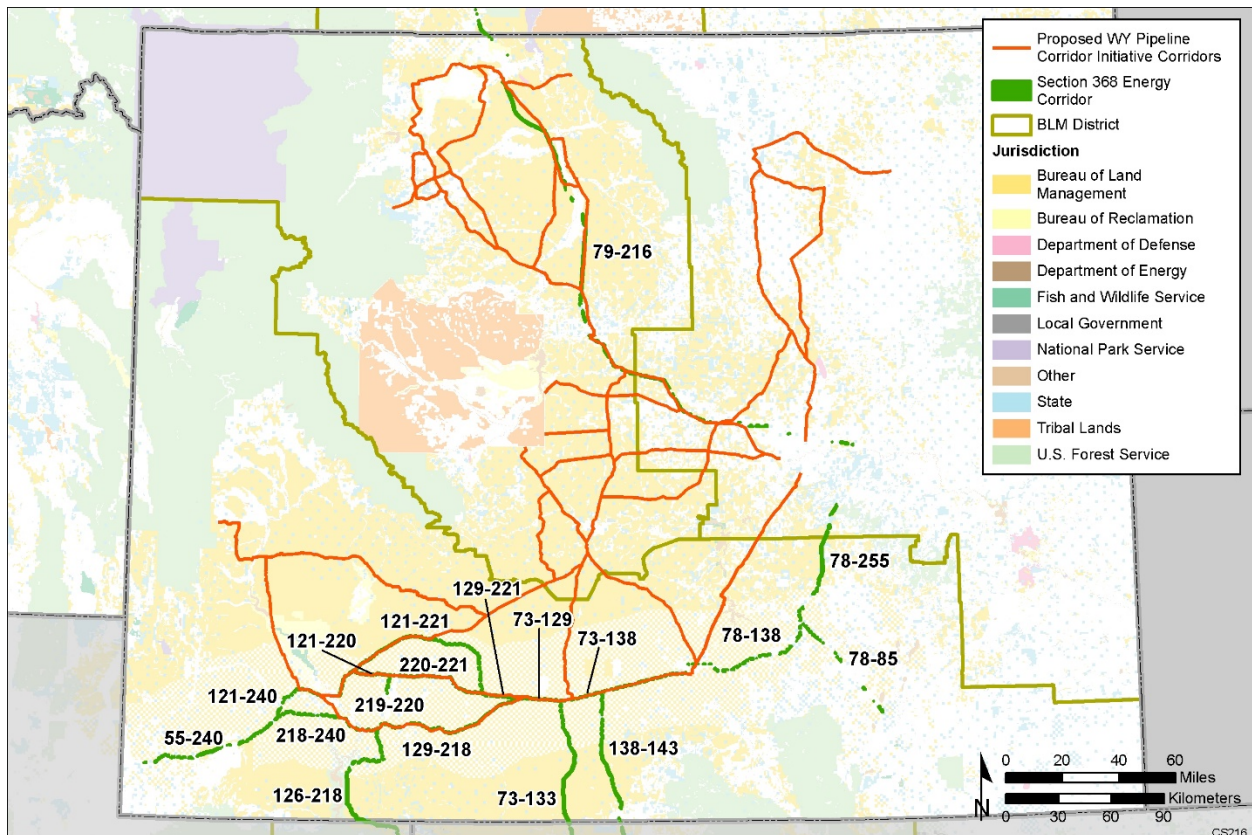


Figure 2-2 Location of Proposed WPCI ROWs Relative to Section 368 Energy Corridors

Pipeline Development in Oregon

Over the past couple of decades, there has been intermittent but continued interest in constructing an east-west pipeline to bring natural gas from the Canadian and U.S. Rockies to the Oregon coast for export as liquefied natural gas (LNG) to destinations outside the United States. In 2009, the Palomar Gas Transmission Project proposed a 217-mile, 36-inch diameter east-west underground natural gas pipeline in northwest Oregon. Corridor 230-248 was designated along this route, but the Palomar natural gas pipeline was never built. Current proposed projects include the Jordan Cove LNG Terminal and Pacific Connector Gas Pipeline. The Pacific Connector Gas Pipeline would involve construction of a 229-mile-long, 36-inch-diameter interstate natural gas pipeline from Malin, Oregon, to Coos County, Oregon. The pipeline would cross approximately 46.9-miles of BLM-managed lands, 30.6-miles of USFS-managed lands, and roughly 0.31-miles of Bureau of Reclamation-managed lands before terminating at a new LNG export terminal (Jordan Cove) in Coos Bay, Oregon.²² The project has not yet been approved and the Jordan Cove Terminal is currently undergoing environmental review and related consultations by the Federal Energy Regulatory Commission, DOE, and other Federal, state and local permitting agencies.

2.1.3 Local Initiatives and Potential Future Development

Inyo County, California, Renewable Energy General Plan Amendment

In March 2015, Inyo County, California, certified a Program Environmental Impact Report and approved a Renewable Energy General Plan Amendment (GPA).

The Renewable Energy GPA established eight Solar Energy Development Areas (SEDAs) within Inyo County totaling over 5,000 acres, divided into three Solar Energy Groups based on their location the County and the associated transmission and distribution facilities. New transmission in or through Inyo County above what is necessary for the megawatt cap placed on each Solar Energy Group is not supported by the County. Therefore, collocation of transmission and intertie facilities is encouraged.²³

The Rose Valley and Owens Lake SEDAs are adjacent to Corridor 18-23 (MP 194 to MP 210 and MP 226 to MP 229) and are within 12 miles of the corridor from MP 121 to MP 129. This corridor could provide future transmission connectivity to the SEDAs, but early engagement would be required to ensure transmission line development is coordinated with Inyo County.

Campbell County, Wyoming

There is local support for energy development opportunities within Campbell County located in northeastern Wyoming, and the county government is interested in discussing the possibility of a potential corridor addition. There is very little Federal land in Campbell County where BLM manages the surface-estate, making the designation of a Section 368 energy corridor impractical. However, it is suggested that during future land use planning, the BLM and USFS should engage with Campbell and adjacent counties that contain more Federal land to assess whether there is interest in and support for a new corridor across Federal land in the area, with the understanding that the corridor would also have to cross private land. A new Section 368 energy corridor in northeastern Wyoming would expand the major interstate energy transmission network and help connect energy resources to demand.

Southern Idaho

There has been substantial and ongoing coordination among the counties in southern Idaho for a potential energy corridor route. Power County has established an Electrical Transmission Corridor Overlay Zone (EO) through a Power County Transmission Line Ordinance, as the County's preferred route for transmission lines. Transmission lines sited outside of the EO must adhere to performance standards before construction and development of future transmission lines would be authorized.

There is also local support for a potential corridor addition along a transmission corridor established by Cassia County in their Comprehensive Plan which runs east-west near the southern border of Cassia County and along the border between Idaho and Utah. The findings of this review suggest that during future land use planning, the BLM and USFS should engage with Cassia, Power, and other adjacent counties in southern Idaho to further assess the counties' coordinated interest and the feasibility of the proposed energy corridor through this area to alleviate concerns of energy infrastructure crossing prime agricultural land to the extent possible.

2.1.4 Authorized Major Energy Infrastructure Project ROWs

Table 3-1 and the corridor summaries describe potential Regions 4, 5, and 6 energy corridor additions, some of which follow recently authorized energy infrastructure ROWs across Federal lands. Recently authorized interstate energy transmission project ROWs across Federal lands in Regions 4, 5, and 6 are listed below.

Energy Gateway South Transmission Project: 250-ft-wide ROW; 416-mile, single-circuit 500-kV transmission system from a substation near Medicine Bow in Carbon County, Wyoming, to a substation near Mona in Juab County, Utah.^{24 25 26} The corridor follows a portion of Corridor 78-138. The project will deliver electricity from planned facilities (including wind energy facilities) in Wyoming.²⁷

Energy Gateway West Transmission Line Project: 250-ft-wide ROW; 1,000 mile, 230-kV (150 miles) and 500-kV (850 miles) transmission system between the Windstar Substation near Glenrock, Wyoming, and the Hemingway Substation near Melba, Idaho. The corridor follows a portion of Corridors 78-255, 78-138, and 73-138. The corridor closely follows but is not collocated with Corridors 73-129, 129-221, 220-221, and 121-220.²⁸ The project will deliver power from existing and future electric resources (including renewable resources such as wind energy) and will provide strength and reliability to the region's transmission system.²⁹

TransWest Express Transmission Project: 250-ft-wide ROW; 728-mile (442 miles on BLM-administered lands; 18 miles on USFS-administered lands), 600-kV direct current transmission system from south-central Wyoming to southern Nevada.^{30 31 32} The corridor follows a portion of Corridor 78-138. The project will deliver electricity generated by renewable resources (including wind energy from Wyoming to the Desert Southwest Region and solar or another type of renewable energy from the Desert Southwest to the Rocky Mountain Region) and will strengthen the power grid that serves the western United States.³³

Boardman to Hemingway Transmission Line Project: 250-ft-wide ROW; 290-mile, 500-kV transmission line between the proposed Longhorn Substation four miles east of Boardman, Oregon, to Idaho Power's existing Hemingway Substation in Owyhee County, Idaho (See Figure 2-3). The project will provide additional electrical load capacity between the Pacific Northwest Region and the Intermountain Region of Southwestern Idaho and alleviate existing transmission constraints.³⁴

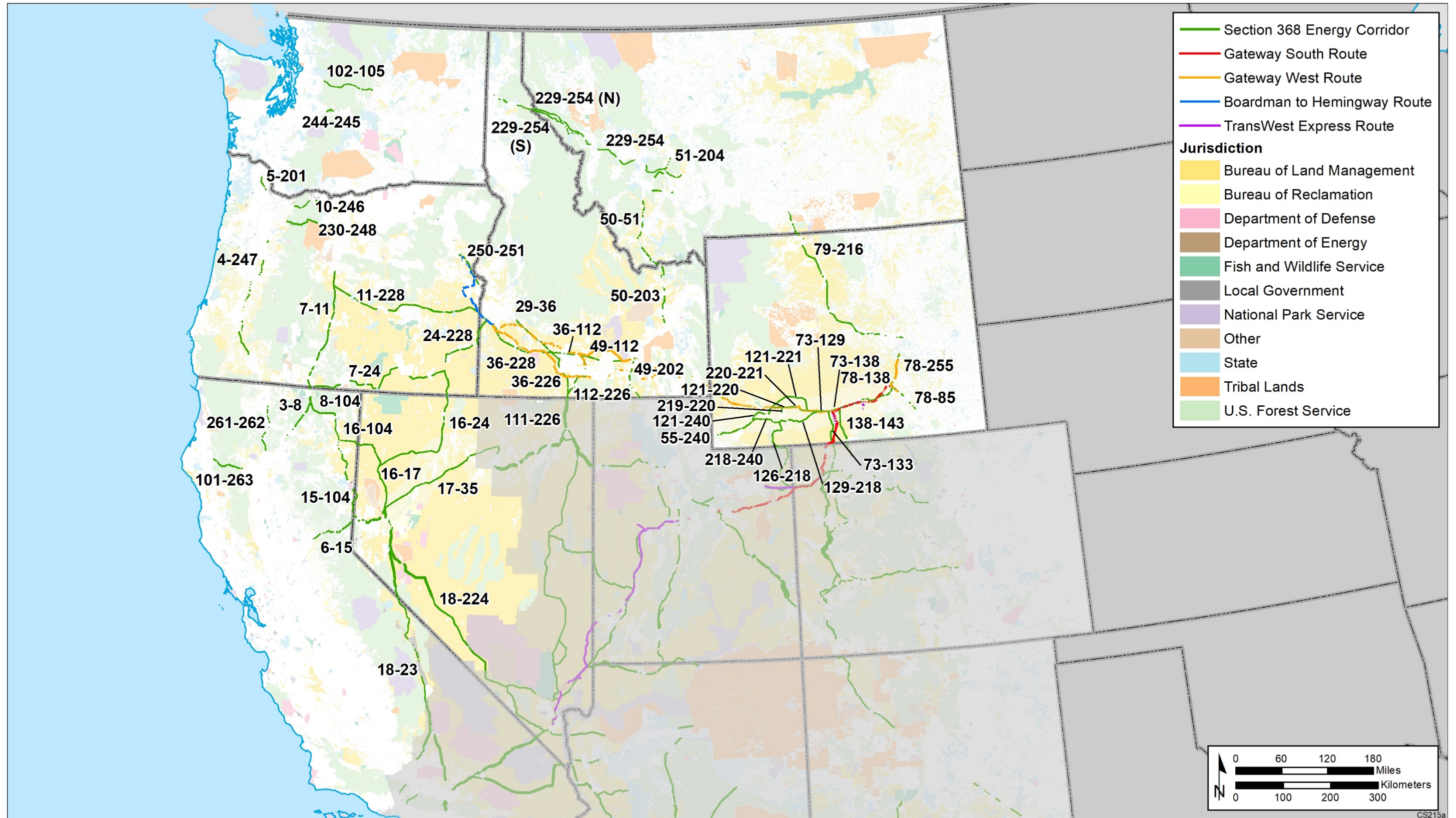


Figure 2-3 Recently Authorized Interstate Energy Transmission Project ROWs in Regions 4, 5, and 6

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Ruby Pipeline Project: 50-ft-wide ROW; 678-mile (368 miles of Federal land), 42-inch-diameter interstate natural gas pipeline system that extends from Wyoming through northern Utah and northern Nevada and terminates near Malin, Oregon. The project provides natural gas from the major Rocky Mountain basins to consumers in California, Nevada, and the Pacific Northwest.

Recently authorized, multi-state energy transmission line project ROWs in Regions 4, 5, and 6 that have necessitated conforming amendments to BLM resource management plans (RMPs) and USFS land management plans (LMPs) are listed in Appendix C.

2.2 Land Use Planning Process and Regional Reviews

BLM RMPs and USFS LMPs guide administration of Federal lands by each agency. RMPs and LMPs outline management guidelines, including designations regarding siting of electric transmission ROWs. The Regions 4, 5, and 6 Section 368 energy corridors are managed under multiple RMPs and LMPs (see Appendix C for a list of the land use plans associated with each Regions 4, 5, and 6 Section 368 energy corridor). At the time this report was written, several agency land use planning efforts were in progress or scheduled to initiate soon. In-process land use planning is not included in this regional review, but to the extent possible, the information from this regional review related to potential Section 368 energy corridor revisions, deletions, and additions is being shared with those land use planning efforts to improve government efficiencies.

2.2.1 Amendments to RMPs and LMPs

Since the designation of Section 368 energy corridors in 2009, RMP and LMP amendments have been issued that affect management of Section 368 energy corridors or identify changes to corridor boundaries. These RMP and LMP amendments are listed below.

GRSG-Approved Resource Management Plan Amendments (ARMPAs)

Of the 59 Regions 4, 5, and 6 corridors, 45 intersect GRSG habitat areas, which include priority habitat management areas (PHMAs), general habitat management areas (GHMAs), sagebrush focal areas (SFAs), and other or additional habitat management areas (HMAs). The BLM and USFS 2015 and 2016 GRSG RODs and associated Approved Resource Management Plan Amendments (ARMPAs), Approved Resource Management Plans (ARMPs), or Land Management Plan Amendments (LMPAs) were aimed at protecting GRSG populations and include the following:

- Wyoming GRSG ARMPA;³⁵
- Billings Field Office ARMPA;³⁶
- Cody Field Office ARMP;³⁷
- Worland Field Office ARMP;³⁸
- Idaho and Southwestern Montana GRSG ARMPA;³⁹
- Nevada and Northeastern California GRSG ARMPA;⁴⁰
- Oregon GRSG ARMPA;⁴¹
- ROD and LUPA for the Nevada and California GRSG Bi-State DPS in the Carson City District and Tonopah Field Office;⁴²

- GRSG ROD Idaho and Southwest Montana, Nevada and Utah and LMPAs;⁴³
- GRSG ROD Northwest Colorado and Wyoming and LMPAs;⁴⁴ and
- GRSG Bi-State Distinct Population Forest Plan Amendment ROD.⁴⁵

The BLM released GRSG RODs and ARMPAs in March 2019 that amended the BLM’s 2015 GRSG RODs and ARMPAs.⁴⁶ These 2019 GRSG RODs and ARMPAs amended some of the RMPs previously amended by the 2015 GRSG ARMPAs. To the extent feasible, the information in the 2019 GRSG RODs and ARMPAs was considered in the analyses conducted for the Region 4, 5, and 6 regional reviews. The 2019 GRSG RODs and ARMPAs applicable to Regions 4, 5, and 6 include the following:

- Idaho GRSG ROD and ARMPA;⁴⁷
- Nevada and Northeastern California GRSG ROD and ARMPA;⁴⁸
- Oregon GRSG ROD and ARMPA;⁴⁹ and
- Wyoming GRSG ARMPA and ROD.⁵⁰

Appendix B enumerates changes (if any) to the Section 368 energy corridors that were made on the basis of decisions in the 2015, 2016, or 2019 GRSG RODs, ARMPAs, and LMPAs. Potential corridor revisions aimed at protecting GRSG habitat identified in this regional review include re-aligning a corridor, reducing the corridor width, removing corridor segments, or designating corridors as underground only. Where applicable, these potential revisions are described in the corridor summaries and in Table 3-1.

2.3 Summary of Stakeholder Input

Agencies consider robust stakeholder input to be critical to an effective and comprehensive regional review of West-wide energy corridors. The Agencies engaged stakeholders through letters, website notifications, public webinars, conference calls, workshops, and in-person meetings. The Agencies compiled input from diverse perspectives to evaluate Section 368 energy corridors and identify potential revisions, deletions, and additions consistent with Settlement Agreement siting principles. Appendix D of this report describes the stakeholder engagement process, lists the entities that provided input during comment periods and workshops, and summarizes the input received from stakeholders.

3. Potential Regions 4, 5, and 6 Section 368 Energy Corridor Modifications

3.1 Potential Corridor Revisions, Deletions, and Additions

The Agencies' review of Section 368 energy corridors in Regions 4, 5, and 6, including corridors of concern, identified potential revisions, deletions, and additions to the corridors for consideration in future land use planning, either with a plan amendment or as part of a larger planning effort.

Potential corridor revisions range from minor shifts to avoid an environmental resource (e.g., GRS habitat, an ACEC, or lands with wilderness characteristics) to larger corridor adjustments to better follow existing or recently authorized infrastructure. This report identifies 45 potential corridor revisions.

The regional review identifies four potential corridor deletions where the designated corridor does not substantially meet the siting principles (i.e., where the corridor does not minimize impacts and is no longer considered to be a necessary energy pathway):

- Corridor 7-24 generally runs east-west across portions of southern Oregon, where there is no foreseeable utility-scale east-west energy demand. The corridor does not contain existing energy infrastructure and crosses GRS SFAs and PHMAs along much of its length.
- Corridor 16-104 generally runs north-south across about 30 miles of Nevada and then runs east-west about 45 miles to California. The corridor intersects PHMAs where there is no existing infrastructure, and other corridors in the area can meet future energy needs.
- Corridor 121-240 is an east-west corridor in Wyoming that does not follow existing infrastructure, and a more preferable pathway for energy transmission has been identified along the recently authorized Gateway West route.
- Corridor 138-143 is a north-south corridor at a location in Wyoming where a more preferable pathway for energy transmission has been identified along the recently authorized TransWest/Gateway South route.

The Agencies considered potential new corridors along recently authorized energy transmission project ROWs or where demand is needed (e.g., to better connect to renewable energy resources). This report identifies three potential corridor additions:

- A north-south corridor along TransWest Express from Wyoming into Colorado;
- An east-west corridor along the recently authorized Gateway West route from Wyoming to the Idaho border; and
- A northeast-southwest corridor from Burns, Oregon, to Corridor 7-11 along an existing 500-kV transmission line.

The Agencies considered adding a new corridor following the Ruby Pipeline route, but determined that additional infrastructure collocated with Ruby Pipeline is unlikely due to resource concerns (GRSG habitat in Nevada and cultural resources and access issues), a lack of energy demand, and separation integrity requirements for co-location with transmission lines.

Figure 3-1 shows potential revisions to Section 368 energy corridors in Regions 4, 5, and 6 on a map of the corridor network. Table 3-1 contains a summary of the potential revisions, deletions, and additions for the Section 368 energy corridors in Regions 4, 5, and 6, including the rationale for those potential changes. More detailed information for all the corridors is provided in the corridor summaries. Appendix E contains a table showing the Agencies' application of the corridor siting principles in identifying potential revisions, deletions, and additions to the Section 368 energy corridors in Regions 4, 5, and 6.

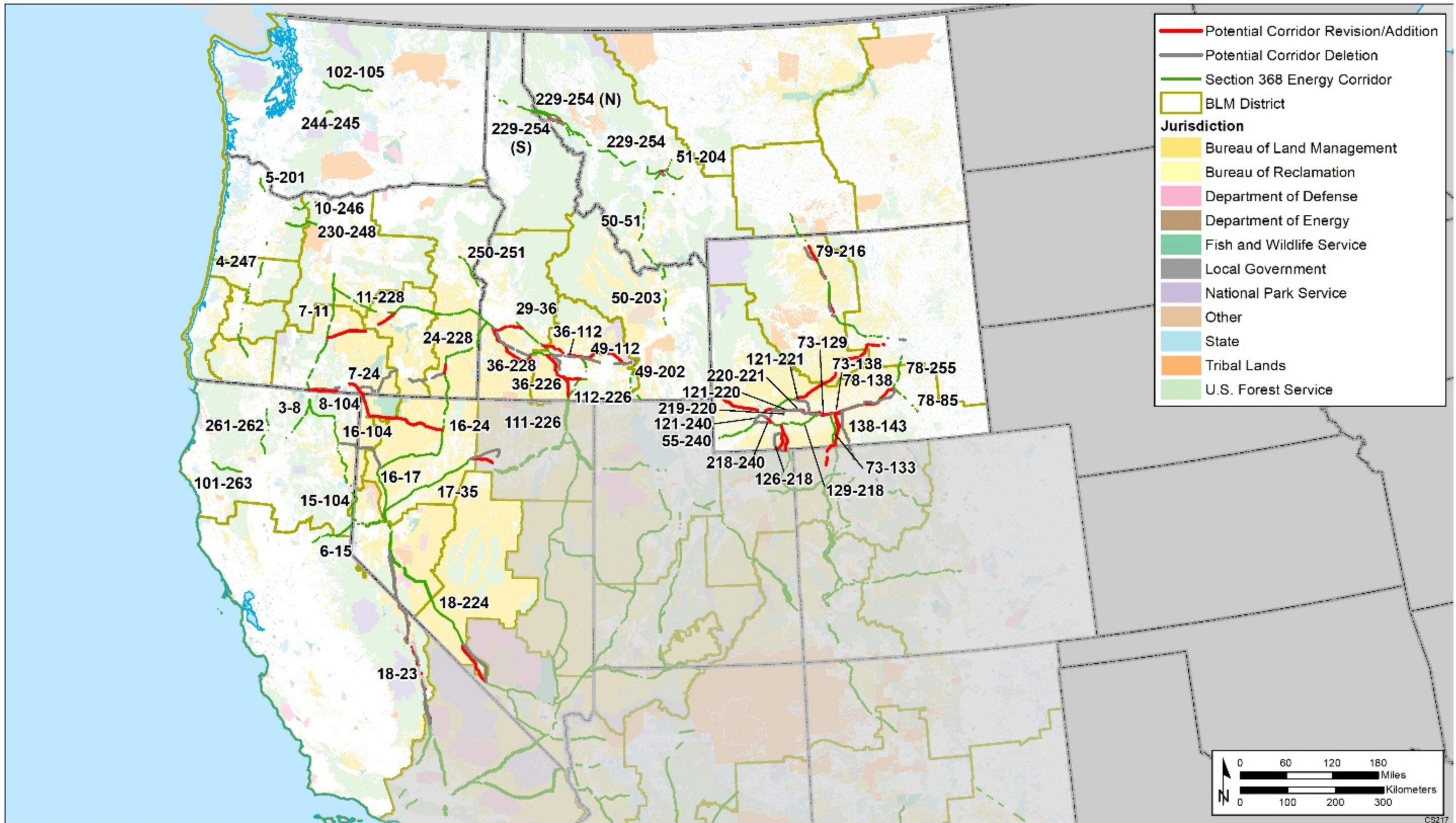


Figure 3-1 Potential Revisions, Deletions, and Additions to Regions 4, 5, and 6 Section 368 Energy Corridors

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Table 3-1 Summary of Potential Revisions, Deletions, and Additions to Regions 4, 5, and 6 Section 368 Energy Corridors

Corridor # ^a and Location	Potential Revision, Deletion, or Addition	Rationale
Potential Corridor Revisions		
3-8 California	Consider deleting corridor segment at MP 0; expanding corridor west from MP 16 to MP 22; and shifting corridor slightly east, with existing infrastructure as western boundary, from MP 52 to MP 58. Alternately consider merging the corridor segment between MP 52 to MP 58 with MP 0 to MP 7 of Corridor 8- 104.	The potential minor revisions would minimize impacts on the Pacific Crest NST, Northern Spotted Owl critical habitat, the Mayfield roadless area, the Emigrant Trail National Scenic Byway, and the Four Trails Feasibility Trail, while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
4-247 Oregon	Consider shifting corridor east at MP 122 and MP 136; shifting corridor west from MP 140 to MP 143; and limiting future infrastructure to western portion of corridor from MP 151 to MP 152.	The potential minor revisions would minimize impacts on Coho Salmon critical habitat, the California NHT, and Four Trails Feasibility Study Trail while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
5-201 Oregon	Consider shifting corridor, with existing transmission line as western boundary, from MP 10 to MP 11 and at MP 14.	The potential minor revisions would minimize impacts on Coho Salmon critical habitat and the Tillamook State Forest while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
6-15 California Nevada	Consider shifting corridor north at MP 21 and from MP 27 to MP 31.	The potential minor revisions would minimize some impacts on NHTs and SRMAs while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
7-8 California Nevada	Consider shifting corridor to the east from MP 2 to MP 4 to collocate with three existing transmission lines.	The potential minor revision would minimize impacts on GRSG to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
7-11 Oregon	Consider shifting corridor from MP 77 to MP 81; shifting corridor to better align with existing infrastructure from MP 101 to MP 120; and shifting corridor slightly west from MP 123 to MP 125. Corridor would connect to the potential corridor addition (WagonTire Mountain).	The potential minor revisions would minimize impacts on lands with wilderness characteristics and PHMAs while maintaining a preferred route for potential future energy development better collocated with existing infrastructure.
8-104 California	Consider shifting corridor slightly east, with existing transmission line as western boundary, from MP 13 to MP 18 and shifting corridor west from MP 70 to MP 75.	The potential minor revisions would further avoid the Damon Butte Roadless Area and minimize impacts on the Emigrant Trail National Forest Scenic Byway and Four Trails Feasibility Study Trail while maintaining a preferred route for potential future energy development collocated with existing infrastructure.

Corridor #^a and Location	Potential Revision, Deletion, or Addition	Rationale
10-246 Oregon	Consider shifting corridor slightly northwest from MP 21 to MP 23 or siting future development northwest of existing transmission lines.	The potential minor revision would minimize impacts on the Sandy River WSR, Coho Salmon critical habitat, and visual resources while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
11-103 Oregon	Consider shifting corridor west from MP 0 to MP 1. From MP 14 to MP 15, consider shifting corridor west and/or locating new infrastructure within corridor west of existing transmission line or restricting development to underground only.	The potential minor revisions would minimize impacts on GRSG and visual resources while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
11-228 Oregon Idaho	Consider shifting corridor along existing transmission line from MP 0 to MP 4; shifting corridor south from MP 61 to MP 65, MP 149 to MP 151, MP 162 to MP 171, and MP 177 to MP 188; and shifting corridor north from MP 192 to MP 194.	The potential minor revisions would minimize impacts on lands with wilderness characteristics while maintaining a preferred route for potential future energy development better collocated with existing infrastructure.
15-104 California Nevada	Consider shifting corridor east of the existing transmission line at MP 10 and MP 26 and shifting corridor northeast to more closely follow existing transmission line from MP 40 to MP 44.	The potential minor revisions would minimize impacts on the Fort Sage CA SRMA and Webber's Ivesia critical habitat while maintaining corridor width on Federal land and providing a preferred route for potential future energy development collocated with existing infrastructure.
16-17 Nevada	Consider shifting corridor west from MP 22 to MP 30.	The potential minor revision would minimize impacts on Mount Limbo WSA and visual resources while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
16-24 Nevada Oregon	Consider shifting corridor along existing infrastructure from MP 0 to MP 12; shifting corridor along the existing transmission line from MP 44 to MP 56, MP 115 to MP 130, and MP 154 to MP 160; and extending corridor north to connect to Corridor 24-228 along the highway.	The potential minor revisions would minimize potential environmental impacts by better aligning with existing infrastructure. Additional corridor revisions to avoid large checkerboard area between MP 56 and MP 105 could be considered at the project-specific level, in coordination with local government and landowners. The potential corridor extension would create a continuous north-south pathway for potential future energy infrastructure.
17-18 Nevada	Consider shifting corridor west from MP 43 to MP 51 along existing 230-kV transmission line.	The potential minor revision would minimize impacts on the Walker River Reservation while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
17-35 Nevada	Consider adding a corridor braid at MP 136 west to collocate with the existing 230-kV transmission line until it joins with MP 195 in Region 3.	The potential revision would minimize impacts on PHMAs in Region 3 while maintaining a preferred route for potential future energy development collocated with existing infrastructure.

Corridor # ^a and Location	Potential Revision, Deletion, or Addition	Rationale
18-23 Nevada California	Consider shifting corridor where it deviates from the existing infrastructure to follow the 1000-kV DC line from MP 86 to MP 216, widening corridor to 1320 ft between MP 110 and MP 116; and designating future development only within existing ROW footprint between MP 38 and MP 212.	Restricting development to the existing ROW footprint would limit future impacts while maintaining corridor utility. Widening the corridor between MP 110 and MP 118 would help establish an appropriate and compatible boundary to maintain utility of corridor if WSAs are designated as wilderness. The potential revision along the DC transmission line might further the purpose of recently enacted legislation designating the Alabama Hills National Scenic Area.
18-224 Nevada	Consider shifting corridor northeast from MP 46 to MP 48; shifting corridor about 1 to 5 miles west from MP 163 to MP 225; and joining the existing transmission line south of the Town of Beatty into Region 1.	The potential revisions would avoid a pinch point along the Hawthorne Army Ammunition Depot, the Nevada Test and Training Range expansion, and the Town of Beatty. If carefully sited, the revision would also avoid desert tortoise connectivity habitat. The potential revision should maintain adequate distance from Death Valley National Park and follow a route that would minimize terrain issues.
24-228 Oregon Idaho	Consider shifting corridor to the western edge of the highway or transmission line from MP 82 to MP 85; shifting corridor west from MP 90 to MP 95; and making small shifts from MP 7 to MP 76. Consider extending corridor from its southern end (MP 0) to connect with Corridor 16-24 at MP 195.	The potential revisions would minimize impacts on SRMAs (Blackstock, Squaw Creek Addition, and Owyhee Front), the Squaw Creek Research Natural Area ACEC, and lands with wilderness characteristics while maintaining corridor width on Federal land. The corridor extension would provide a southern pathway into California.
29-36 Idaho	Consider shifting corridor to the northeast from MP 10 to MP 12 and MP 46 to MP 50. The potential revision for Corridor 36-112 along the ROW for the recently authorized Gateway West route would connect to Corridor 29-36 at MP 45, providing a secondary route or corridor braid.	The potential revisions would minimize impacts on Slickspot Peppergrass critical habitat and the Four Trails Feasibility Study Trail. The potential revisions would create a preferred route for potential future energy development connecting multiple Section 368 energy corridors and collocating with the ROW for the recently authorized Gateway West Transmission Project.
36-112 Idaho	Consider shifting entire corridor north to follow the ROW for the recently authorized Gateway West route, beginning at Corridor 29-36 at MP 46 and connecting to Corridor 36-112 at the end of the corridor at MP 38.	The potential revision would avoid the Oregon NHT, Snake River WSR, and non-Federal lands (including prime farmland) to the greatest extent possible. The potential revision would create a preferred route for potential future energy development collocated with the ROW for the recently authorized Gateway West Transmission Project.

Corridor # ^a and Location	Potential Revision, Deletion, or Addition	Rationale
36-226 Idaho	Consider shifting corridor along the ROW for the recently authorized Gateway West route, beginning at Corridor 36-228 at MP 8 and connecting to Corridor 36-226 at MP 42. Between MP 40 and MP 64.9, shift corridor slightly to the west to have the existing 116-kV transmission line as its western boundary (Figure 3.5-24c). Consider adding a secondary route or corridor braid along Gateway West to connect Corridor 36-226 at MP 42 to Corridor 112-226 at MP 38.	The potential revision would avoid sensitive areas, including the Oregon NHT, Fossil Beds National Monument, and non-Federal lands (including prime farmland) to the greatest extent possible. The potential revision would create a preferred route for potential future energy development by connecting multiple Section 368 energy corridors and collocating with the ROW for the recently authorized Gateway West Transmission Project.
36-228 Idaho	Consider two potential revisions: 1. Aligning corridor along the ROW for the recently authorized Gateway West route, beginning at MP 89 and connecting to Corridor 29-36 at MP 12; and 2. Aligning corridor along BLM-managed lands south of the current corridor location, possibly along Gateway West alternative 9E, from MP 32 to MP 95.	1. The potential revision would avoid private lands in Owyhee County, where there is no existing infrastructure and where there is strong local opposition to future development within the corridor. The potential revision would depend on whether it is compatible with the purposes of the Morley Nelson Snake River Birds of Prey NCA. The potential revision would create a preferred route for potential future energy development by connecting multiple Section 368 energy corridors and collocating with the ROW for the recently authorized Gateway West Transmission Project. 2. The potential revision would avoid private lands in Owyhee County and the NCA, and while it would not follow existing infrastructure, it would create a preferred route for potential future energy development by connecting multiple Section 368 energy corridors.
49-112 Idaho	Consider shifting corridor along the ROW for the recently authorized Gateway West route, beginning at MP 14 and connecting to the potential revision for Corridor 36- 112.	The potential revision would avoid non-Federal lands to the greatest extent possible and would create a preferred route for potential future energy development by connecting multiple Section 368 energy corridors and collocating with the ROW for the recently authorized Gateway West Transmission Project.
49-202 Idaho	Consider shifting corridor west from MP 0 to MP 1.	The potential minor revision would minimize impacts on the Cedar Fields SRMA while maintaining a preferred route for potential future energy development.
50-51 Montana	Consider shifting corridor outside the highway corridor to the existing 230-kV transmission line from MP 12 to MP 33.	The potential minor revision, while moving the corridor partially into GRSG GHMA, would better avoid non-Federal lands as well as the highway and would provide a preferred route for potential future energy development collocated with existing infrastructure.

Corridor #^a and Location	Potential Revision, Deletion, or Addition	Rationale
50-203 Montana Idaho	Consider shifting corridor slightly west, with I-15 or existing transmission line as the eastern border of corridor, from MP 10 to MP 11, and shifting the corridor northwest from MP 118 to MP 123.	The potential minor revisions would minimize impacts on Lewis and Clark NHT, the WSR Study River segment of the Beaverhead River, and the Market Lake Wildlife Management Area, while maintaining corridor width on Federal lands, reducing gaps across private lands, and providing a preferred route for potential future energy development collocated with existing infrastructure.
51-204 Montana	Consider deleting corridor from MP 16 to MP 38. Consider shifting corridor west along existing transmission line from MP 9 and MP 16 to avoid the City of Boulder.	The potential revision would better avoid non-Federal lands and would provide a preferred route for potential future energy development collocated with existing infrastructure. MP 16 to MP 38 contains little Federal land and should not be considered a preferred route for future development.
51-205 Montana	Consider shifting corridor between MP 2 and MP 12 so existing 230-kV transmission line is southern corridor boundary. Consider deleting corridor from MP 12 to MP 28.	The potential revision would better avoid I-90 and would provide a preferred route on Federal lands for potential future energy development better collocated with existing infrastructure. The segment from MP 12 to MP 28 contains little Federal land and should not be considered a preferred route for future development.
55-240 Wyoming	Consider shifting corridor slightly north from MP 35 and MP 39.	The potential minor revisions would minimize impacts on the California NHT, Oregon NHT, Mormon Pioneer NHT, Pony Express NHT, and Four Trails Feasibility Study Trail while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
73-129 Wyoming	Consider shifting entire corridor to follow the ROW for the authorized Gateway West route.	The potential corridor revision would create a preferred route for potential future energy development collocated with planned infrastructure and would provide connectivity to renewable energy generation.
73-138 Wyoming	Consider shifting entire corridor to follow the ROW for the authorized Gateway West route.	The potential corridor revision would create a preferred route for potential future energy development collocated with planned infrastructure and would provide connectivity to renewable energy generation.
78-138 Wyoming	Consider shifting entire corridor to follow the ROW for the authorized Gateway West route.	The potential corridor revision would create a preferred route for potential future energy development collocated with planned infrastructure and would provide connectivity to renewable energy generation.
79-216 Montana Wyoming	Consider deleting corridor from MP 0 to MP 32 and shifting corridor as needed to align with existing infrastructure, such as from MP 103 to MP 125, MP 158 to MP 170, and MP 185 to MP 209.	The potential revisions would create a preferred route for potential future energy development by better collocating with existing infrastructure. The segment from MP 0 to MP 32 contains little Federal land and should not be considered a preferred route for future development.
101-263 California	Consider shifting corridor south from MP 14 to MP 18, with existing transmission line as northern border of corridor.	The potential minor revision would minimize impacts on the Trinity, California National WSR while maintaining a preferred route for potential future energy development collocated with existing infrastructure.

Corridor #^a and Location	Potential Revision, Deletion, or Addition	Rationale
111-226 Idaho	Consider shifting corridor east, with existing transmission line as western border of corridor from MP 28 to MP 30. Consider shifting corridor west or narrowing corridor from MP 32 to MP 34.	The potential minor revisions would minimize impacts on visual resources while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
112-226 Idaho	Consider shifting corridor north from MP 30 to MP 41 and MP 44 to MP 50, with existing transmission line as southern border of corridor.	The potential minor revisions would minimize impacts on PHMAs and IHMAs while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
121-220 Wyoming	Consider shifting corridor south to align with the ROW for the recently authorized Gateway West route, from MP 9 to MP 13 at end of corridor.	The potential corridor addition would create a preferred route for potential future energy development collocated with the ROW for the recently authorized Gateway West Transmission Project.
121-221 Wyoming	Consider shifting corridor between MP 11 and MP 15, with existing pipeline as border of corridor; shifting the corridor from MP 27 to MP 28, with existing pipeline as border of corridor; shifting corridor to follow WPCI and/or existing pipeline infrastructure from MP 31 to end of corridor; and designating as underground-only.	The potential revision would minimize impacts on the ACEC, visual resources, Killpecker Sand Dunes SRMA, and GRSG while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
126-218 Wyoming	Consider deleting corridor from MP 62 in Utah to MP 109 and revising corridor along either existing pipeline or transmission line to the east.	The potential revision would minimize impacts on the Flaming Gorge NCA while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
129-221 Wyoming	Consider revising entire length of corridor to follow the ROW for the recently authorized Gateway West route.	The potential corridor revision would create a preferred route for potential future energy development collocated with the ROW for the recently authorized Gateway West Transmission Project.
218-240 Wyoming	Consider shifting corridor slightly north from MP 18 to MP 23, with existing infrastructure as southern border of corridor.	The potential minor revision would avoid PHMAs while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
220-221 Wyoming	Consider shifting entire corridor slightly to follow the ROW for the recently authorized Gateway West route.	The potential corridor revision would create a preferred route for potential future energy development collocated with the ROW for the recently authorized Gateway West Transmission Project.
229-254(S) Idaho Montana	Consider shifting corridor from MP 25 to MP 50 to align with existing transmission line, rather than I-90.	The potential minor revisions would minimize impacts on Bull Trout critical habitat while maintaining a preferred route for potential future energy development collocated with existing energy infrastructure.

Corridor #^a and Location	Potential Revision, Deletion, or Addition	Rationale
244-245 Washington	Consider adding lands acquired after 2009 to the designated corridor in future land use planning and collocating potential future energy development closely with existing infrastructure.	The potential minor revisions would minimize concerns regarding steep topography and water quality within the Green River Municipal Watershed while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
250-251 Oregon	Consider shifting corridor slightly from MP 18 to MP 28.	The potential minor revisions would minimize impacts on the Oregon NHT and Snake River-Mormon Basin Back Country Byway while maintaining a preferred route for potential future energy development collocated with existing infrastructure.
Potential Corridor Deletions		
7-24 Oregon	Consider deleting corridor and replacing it with a north-south route (see Wagontire Mountain Corridor addition).	The corridor does not contain any infrastructure and crosses PHMAs along most of its length. In addition, there does not appear to be an east-west energy demand in the area. Therefore, the corridor does not meet the siting principles in the Settlement Agreement.
16-104 California Nevada	Consider deleting corridor.	Although there is an existing 1000-kV transmission line in the corridor from MP 0 to MP 30, a PHMA intersects the corridor where there is no existing infrastructure (from MP 43 to MP 75). In addition, there are other corridors in the area that can meet future energy needs.
121-240 Wyoming	Consider deleting corridor and replacing it with the Gateway West potential corridor addition (see below for Potential Corridor Addition-Gateway West).	The segment from MP 25 to MP 38 does not align with existing infrastructure, portions of the corridor intersect and are adjacent to the Oregon NHT/Mormon Pioneer NHT/Pony Express NHT, and the recently authorized Gateway West route is a better pathway for energy transmission than Corridor 121-240 because the Gateway West route better supplies energy demand.
138-143 Wyoming	Consider deleting corridor and replacing with Wamsutter-Powder Rim potential corridor addition (see below for Potential Corridor Addition-Wamsutter-Powder Rim).	The recently authorized TransWest Express/Gateway South route is a better pathway for energy transmission than Corridor 138-143 because the TransWest Express/Gateway West route follows a similar path and indicates near-term future electric transmission needs, as well as potentially favorable locations for corridor development.
Potential Corridor Additions		
Wamsutter-Powder Rim Wyoming	Consider upgrading the 3,500-foot Wamsutter-Powder Rim locally designated utility corridor along the ROW for the authorized TransWest Express route to a new Section 368 energy corridor (electric-only). The potential new corridor would begin at MP 15 of Corridor 73-138 and run south along the approved TransWest/Gateway South route.	The potential corridor addition would create a preferred route for potential future energy development collocated with the ROW for the recently authorized TransWest Express Transmission Project.

Corridor # ^a and Location	Potential Revision, Deletion, or Addition	Rationale
Gateway West Wyoming	Consider a new corridor, designated as multimodal to accommodate both pipelines and transmission lines, along the ROW for the recently authorized Gateway West route beginning at the western end of Corridor 121-220 and running west to the Idaho/Wyoming border.	The potential corridor addition would create a preferred route for potential future energy development collocated with the ROW for the recently authorized Gateway West Transmission Project.
Wagontire Mountain Oregon	Consider a new corridor from Burns, Oregon, heading south/southwest along the existing 500-kV transmission line to connect to Corridor 7-11.	The potential corridor addition would create a preferred route for potential future energy development, including wind energy development, collocated with existing infrastructure while avoiding PHMAs to the greatest extent possible.
Southern Idaho Idaho	Consider a new corridor through Cassia County along the border between Idaho and Utah.	The potential corridor addition would create an east-west route through southern Idaho that has local government consensus and avoids private agricultural land.
No Potential Revisions, Deletions, or Additions		
6-15 15-17 73-133	78-85 78-255 102-105 129-218	219-220 229-254 230-248 261-262
^a Corridors of Concern are identified in red text.		

3.2 General Considerations for Future Energy Development

During the West-wide Energy Corridor Regional Reviews, the Agencies identified several actions that would help agency decision-makers address concerns related to Section 368 energy corridors and thus promote improved use of the corridors and protection of valuable resources.

In the Region 1 Review, the Agencies identified the need to:

- Provide Agency policy and program guidance to local BLM and USFS offices describing the purpose and benefits of designating and using Section 368 energy corridors.
- Improve coordination between the BLM, USFS, and other involved agencies to avoid or restrict siting of nonlinear features such as geothermal and solar energy facilities within Section 368 energy corridors.
- Review why a Section 368 energy corridor was not used when an authorized long-distance oil, gas, or hydrogen pipeline or high-voltage electric transmission or distribution line has been located outside of or adjacent to a Section 368 energy corridor and consider whether

future revisions, deletions, or additions to the unused corridor segments could improve utilization of the corridor.

- Consider a corridor shift when a Section 368 energy corridor straddles a road or trail (e.g., an Interstate Highway, an NST, an NHT, or a Scenic Byway) to increase the potential for meeting applicable VRM objectives.
- Encourage proponents of projects in Section 368 energy corridors to integrate visual resource planning and design principles during the early phases of project planning to meet BLM VRM and USFS scenic integrity objectives and avoid land use plan amendments.

Additionally, during the Regions 2 and 3 Review, the Agencies identified the need for agency decision-makers to:

- Consider realigning corridors with existing infrastructure to allow maximum utilization. Figure 3-2 from the Regions 2 and 3 Review report shows how a corridor can be shifted along existing infrastructure to maximize utilization as well as avoid an ACEC and lands with wilderness characteristics.
- Include robust communication between local BLM and USFS offices and the Section 368 Interagency Workgroup in Agency policy and program guidance to ensure that changes to Section 368 energy corridors resulting from land use plan revisions or amendments are updated in the Section 368 energy corridor mapping tool to provide transparency to stakeholders.

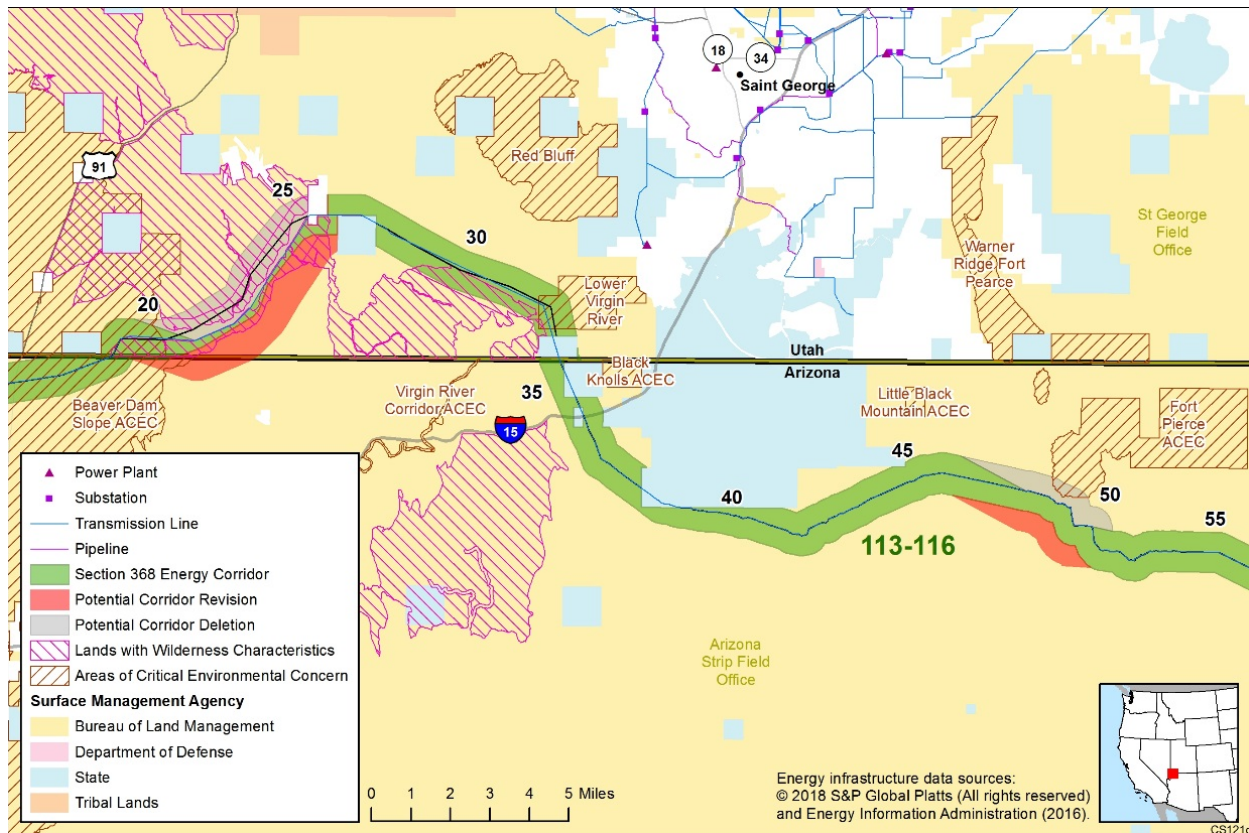


Figure 3-2 Corridor 113-116: Corridor Shift to Avoid ACEC (excerpted from Regions 2 and 3 report)

In the Regions 4, 5, and 6 Review, the Agencies identified the following additional considerations for agency decision-makers:

- Since Federal lands are not always contiguous, the corridors contain corridor gaps where they cross tribal, state, and private lands. Improved engagement and early coordination with state and local governments and tribes could help the Agencies site corridors in locations that are more preferable to state, local, and tribal governments and avoid areas of concern. State, local, and tribal governments have expressed concerns about proximity to farmland, irrigation and agriculture, private residences and local communities, highway ROWs, and sensitive cultural resources.
- When the BLM or USFS acquires lands within a corridor gap, the Agencies should provide guidance and direction for the conditions under which those lands should be designated as a Section 368 energy corridor. Similarly, the Agencies need to remove the corridor designation when the BLM or USFS disposes of Federal lands within a Section 368 energy corridor.
- The Agencies should encourage preferred uses of Section 368 energy corridors. Land use planning for corridors should include programmatic impact considerations for the intended uses related to infrastructure.

3.3 Corridor Management

The minimum specifications for each designated energy corridor include specifying the length, width, and compatible uses of the corridor. The regional reviews have identified that this minimum standard lacks the detail needed to administer Section 368 energy corridors effectively in terms of corridor utilization and resource protection. Agency land use planning needs improved Section 368 energy corridor management specifications and direction to enhance corridor utilization and resource protection both inside and outside Section 368 energy corridors. Agency land use plans should:

- Include a legal description for the corridor centerline and mileposts;
- Specify the corridor width and, if the corridor width is variable, specify where and how variations occur;
- Specify modes of corridor use (e.g., multimodal, electric transmission only, pipeline only, underground use only);
- Enumerate compatible corridor uses in the following order of priority: major energy transmission infrastructure, minor energy transmission and distribution infrastructure, broadband telecommunications and fiber optic infrastructure,⁵¹ and access roads;
- Identify non-compatible corridor uses;
- Enumerate corridor management objectives;
- List management actions to improve transmission reliability, relieve congestion, and enhance the capability of the energy grid to deliver electricity;
- Preclude or limit certain types of land use allocations as necessary to insure the orderly administration of Section 368 energy corridors as preferred locations for long-distance oil, gas, and hydrogen pipelines and high-voltage electric transmission and distribution lines; and
- Align other management actions with the purposes of Section 368 energy corridors. Examples of this type of alignment include the following:
 - Section 368 energy corridors serve a public benefit by providing a reliable location for transmission infrastructure development for the supply of energy essential to the local, regional, and national economies.
 - Vegetative conditions and vegetation management objectives are aligned with energy transmission reliability standards.
 - Other land uses in Section 368 energy corridors are compatible with and not detrimental to construction, operation, maintenance, and decommissioning of energy transmission facilities and associated access and infrastructure.
 - Obsolete or unused facilities in Section 368 energy corridors are promptly removed, and the areas where the removed facilities were situated are rehabilitated to the satisfaction of the authorized officer.
 - Section 368 energy corridors are managed to prevent motorized and non-motorized recreational uses in the corridors.
 - Section 368 energy corridors are managed to meet VRM III or VRM IV objectives.
 - Section 368 energy corridors are managed to avoid the introduction or minimize the spread of noxious and invasive plant species in the corridors.

Additional guidance on land use planning for Section 368 energy corridors is contained in Appendix F.

Designated energy corridors are preferred locations for linear ROWs and facilities. Where there are competing management objectives for the same Federal lands, the agency planning staff should balance the need for responsible corridor development with the objective of minimizing adverse environmental impacts. The corridor summaries identify conflicting management objectives in each of the Regions 4, 5, and 6 Section 368 energy corridors and potential corridor additions that could address those conflicts.

3.4 General Considerations for IOP Revisions, Deletions, and Additions

IOPs are critical for expediting application processing in Section 368 energy corridors and providing consistency between the BLM and USFS in administering Section 368 energy corridors. The IOPs were developed through the West-wide Energy Corridor PEIS and designated in the subsequent BLM and USFS RODs to provide uniform criteria for evaluating proposals and applications for using Section 368 energy corridors. The IOPs are similar to BMPs, but they are mandatory and apply to all proposals, applications, and authorizations for energy transmission projects in Section 368 energy corridors administered by the BLM or USFS. The IOPs are presented in Appendix B of both RODs.^{52 53}

The Agencies have determined that the IOPs are sometimes poorly understood and inconsistently utilized. Therefore, in addition to identifying potential revisions, deletions, and additions to the IOPs in the regional reviews, the Agencies are evaluating how to enhance understanding and consistent application of the IOPs.

The reports for Region 1 and Regions 2 and 3 identify potential new IOPs and IOP revisions:

- The Region 1 report identified the need for new IOPs related to habitat connectivity as an ecological resource, lands with wilderness characteristics, and NSTs and NHTs.
- The Region 1 report identified the need for IOP revisions for three IOPs related to visual resources, vegetation management, and DoD coordination.
- The Regions 2 and 3 report identified the need for new IOPs related to wildlife migration corridors as an ecological resource and ethnographic studies as a tribal concern.

New IOPs could be added and existing IOPs could be revised through internal BLM or USFS guidance or manuals or handbooks.

3.4.1 Potential IOP Additions

During the Regions 4, 5, and 6 review, the Agencies identified the following potential new IOP for GRS habitat:

Ecological Resources. The Agencies should consider adding an IOP related to GRS habitat. An IOP that addresses predation issues (e.g., the installation of barriers or structures to prevent raptors from preying on GRS) where Section 368 energy corridors cross GRS habitat could ensure that the Agencies address impacts on GRS consistently across BLM- and USFS-managed lands.

In addition to the potential new IOP for GRS habitat, the Agencies should consider adding language to the potential new IOPs identified in the Region 1 report and Regions 2 and 3 report:

- For the potential new IOP related to habitat connectivity, the Agencies should consider adding language that provides for addressing wildlife corridors and migration patterns at the project level more consistently.
- For the potential new IOP related to NHTs, the Agencies should consider adding language that provides for consideration of designating a corridor as underground-only where the corridor crosses high potential segments of the NHT.

3.4.2 Potential IOP Revisions

During the Regions 4, 5, and 6 review, the Agencies identified the following potential IOP revision for river crossings:

Surface Water. The Agencies could revise the existing IOP regarding wild and scenic rivers to provide for consideration of reducing the corridor width at wild and scenic river crossings.

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Endnotes and References

¹ IOPs are designed to foster long-term, systematic planning for energy transport development in the West, provide industry with a coordinated and consistent interagency permitting process, and provide practicable measures to avoid or minimize environmental harm from future development within the corridors.

² Corridors of concern are corridors identified by plaintiffs in the Settlement Agreement as having specific environmental issues. Corridors of concern and the specific environmental issues are located in Appendix A of the Settlement Agreement.

³ The term “pinch points” refers to corridor segments with a considerably reduced capacity for new project infrastructure compared to the rest of the corridor. Examples include reduced corridor width due to challenging terrain or jurisdictional land ownership patterns; existing conflicting surface use activities such as airfields, quarries, or mining in or immediately adjacent to the corridor path; and existing infrastructure such as transmission and distribution lines, pipelines, roads, railroads, power generation facilities, or pipeline booster or compressor stations in the corridor path, which may impede the future placement of new project infrastructure within the corridor.

⁴ For this regional review, underground only and pipeline only are synonymous and may include aboveground facilities or components.

⁵ U.S. District Court for the Northern District of California, San Francisco Division, 2012, *Settlement Agreement between The Wilderness Society et al. v. United States Department of the Interior et al.*, No. 3:09-cv-03048 JW, Joint Motion to Dismiss Case Pursuant to Fed. R. Civ. P. 41(a)(2), July 9. Available at http://corridoreis.anl.gov/documents/docs/Settlement_Agreement_Package.pdf. Accessed March 16, 2017.

⁶ BLM, 2009, *Approved Resource Management Plan Amendments/Record of Decision (ROD) for Designation of Energy Corridors on Bureau of Land Management-Administered Lands in the 11 Western States*, BLM/WO-GI-09-005-1800, U.S. Department of the Interior, Bureau of Land Management, Jan.

⁷ USFS, 2009, *Record of Decision, USDA Forest Service Designation of Section 368 Energy Corridors on National Forest System Land in 10 Western States, Decision by Secretary of Agriculture To Amend Land Management Plans Described as the Environmentally Preferred Alternative*, U.S. Department of Agriculture, Forest Service, Jan. 14.

⁸ The plaintiffs include The Wilderness Society, BARK, Center for Biological Diversity, Defenders of Wildlife, Great Old Broads for Wilderness, Klamath-Siskiyou Wildlands Center, National Parks Conservation Association, National Trust for Historic Preservation, National Resources Defense Council, Oregon Natural Desert Association, Sierra Club, Southern Utah Wilderness Alliance, Western Resource Advocates, Western Watersheds Project, and County of San Miguel, Colorado.

⁹ White *et al.*, 2016, *Section 368 Corridor Study*, ANL/EVS-16/6, prepared by the Environmental Science Division, Argonne National Laboratory, Argonne, Ill., for Bureau of Land Management, U.S. Forest Service, and U.S. Department of Energy, May.

¹⁰ NREL, 2018. Energy Futures Synthesis for West-wide Section 368 Energy Corridors. Technical Report NREL/TP-5D00-71464. May.

¹¹ WECC (Western Electricity Coordinating Council) 2017, *TEPPC Study Report: 2026 PC1 Common Case* (Technical Report). Salt Lake City, UT.

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- ¹² BLM and DOE (U.S. Department of Energy), 2012, *Final Programmatic Environmental Impact Statement (PEIS) for Solar Energy Development in Six Southwestern States*, FES 12-24, DOE/EIS-0403, U.S. Department of the Interior, Bureau of Land Management, and U.S. Department of Energy, July.
- ¹³ BLM, 2012, *Approved Resource Management Plan Amendments/Record of Decision (ROD) for Solar Energy Development in Six Southwestern States*, U.S. Department of the Interior, Bureau of Land Management, Oct.
- ¹⁴ The BLM SEZs and BLM Arizona renewable energy development areas (REDAs) can be displayed as a separate GIS layer in the Section 368 Energy Corridor Mapping Tool.
- ¹⁵ BLM, 2005. *ROD for Implementation of a Wind Energy Development Program and Associated Land Use Plan Amendments*. U.S. DOI, BLM, Washington, DC. December. Available at <http://windeis.anl.gov/documents/index.cfm>.
- ¹⁶ BLM, 2017, *DRECP Proposed Land use Plan Amendment and Final EIS* BLM/CA/PL-2016/03+1793+8321. U.S. Dept. of the Interior, BLM. Oct.
- ¹⁷ BLM, 2009, *BLM Instruction Memorandum 2009-043, Wind Energy Development Policy*. Dec 2008. Available at <https://www.blm.gov/policy/im-2009-043>.
- ¹⁸ Energy Information Agency (EIA), 2019, Net Generation by State by Type of Producer by Energy Source.
- ¹⁹ CPUC, 2019, RPS Program Overview.
- ²⁰ DOE, 2019, WINDEXchange: Wind Energy in Wyoming. Office of Energy Efficiency and Renewable Energy, Wind Energy Technologies Office. Available at <https://windexchange.energy.gov/states/wy>
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- ²² <https://www.jordancovelng.com/project/regulatory>.
- ²³ County of Inyo, 2015. Inyo County Renewable Energy General Plan Amendment, Final Errata to the Final Program Environmental Report. GPA No. 2013-02/Inyo County. Mar.
- ²⁴ BLM, 2016, *Final Environmental Impact Statement and Proposed Land-use Plan Amendments for the Energy Gateway South Transmission Project*, BLM/WY/PL-14/009+5001, U.S. Department of the Interior, Bureau of Land Management, BLM Wyoming State Office, Cheyenne, WY, May.
- ²⁵ BLM, 2016, *Record of Decision for the Energy Gateway South Transmission Project Utility Right-of-Way and Resource Plan Amendments*, BLM/WY/PL-14/009+5001, Case Files: WYW-174597, WYW-174597-01; COC-72907, COC-72907-01; and UTU-87237, UTU-87237-01, U.S. Department of the Interior, Bureau of Land Management, BLM Wyoming State Office, Cheyenne, WY, Dec.
- ²⁶ USFS, 2017, *Final Record of Decision Energy Gateway South Transmission Project*, U.S. Department of Agriculture, Forest Service, Uinta-Wasatch-Cache and Manti-La Sal National Forests, May.
- ²⁷ BLM, 2016, Energy Gateway South Transmission Line Project, DOI-BLM-WY-0000-2009-0001-EIS. Available at <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=53044>

²⁸ BLM, 2018, *Gateway West Transmission Line Project and Land Use Plan Amendments, Segments 8 and 9*, IDI-35849-01 DOI-BLM-ID-0000-0002-EA, U.S. Department of the Interior, Bureau of Land Management, BLM Idaho State Office, Boise, ID, Mar.

²⁹ <http://www.gatewaywestproject.com/>.

³⁰ BLM and WAPA (Western Area Power Administration), 2015, *TransWest Express Transmission Project Final Environmental Impact Statement*, BLM/WY/PL-15/012+5101, DOE/EIS-0450, U.S. Department of the Interior, Bureau of Land Management, Wyoming State Office, Cheyenne, WY, and U.S. Department of Energy, Western Area Power Administration, Lakewood, CO, Apr.

³¹ BLM, 2016, *Record of Decision for the TransWest Express Transmission Project and Resource Management Plan Amendments*, BLM Case File Serial Numbers BLM/WY/PL-15/012+5101 WYW-177893, WYW-177893-01 (Colorado Ser. No. COC-72929, COC-72929-01; Utah Ser. No. UTU-87238, UTU-87238-01; and Nevada Ser. No. NVN-86732, NVN-86732-01), U.S. Department of the Interior, Bureau of Land Management, Wyoming State Office, Cheyenne, WY, Dec.

³² USFS, 2017, *Final Record of Decision for the TransWest Express Transmission Project*, U.S. Department of Agriculture, Forest Service, Intermountain Region, Manti-La Sal National Forest and Uinta-Wasatch-Cache National Forest, Juab, Sanpete, Utah and Wasatch Counties, Utah, May.

³³ <http://www.transwestexpress.net/>.

³⁴ BLM, 2019, Boardman to Hemingway Project, DOI-BLM-ORWA-V000-2012-0016-EIS. Available at <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=68150>

³⁵ BLM, 2015, *Bureau of Land Management Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Offices Approved Resource Management Plan Amendment for Greater Sage-grouse*, Attachment 4 to BLM, 2015, *Record of Decision and Approved Resource Management Plan Amendments for the Rocky Mountain Region including the Greater Sage-Grouse Sub-Regions of: Lewistown, North Dakota, Northwest Colorado, and Wyoming and the Approved Resource Management Plans for: Billings, Buffalo, Cody, HiLine, Miles City, Pompeys Pillar National Monument, South Dakota, and Worland*, BLM/WY/PL-15/023+1610, U.S. Department of the Interior, Bureau of Land Management, Wyoming State Office, Cheyenne, WY, Sept.

³⁶ BLM, 2015, *Billings Field Office Greater Sage-Grouse Approved Resource Management Plan*, Attachment 5 to BLM, 2015, *Record of Decision and Approved Resource Management Plan Amendments for the Rocky Mountain Region including the Greater Sage-Grouse Sub-Regions of: Lewistown, North Dakota, Northwest Colorado, and Wyoming and the Approved Resource Management Plans for: Billings, Buffalo, Cody, HiLine, Miles City, Pompeys Pillar National Monument, South Dakota, and Worland*, BLM/MT/PL-15/011+1610, U.S. Department of the Interior, Bureau of Land Management, Billings Field Office, Billings, MT, Sept.

³⁷ BLM, 2015, *Cody Field Office Approved Resource Management Plan*, Attachment 7 to BLM, 2015, *Record of Decision and Approved Resource Management Plan Amendments for the Rocky Mountain Region including the Greater Sage-Grouse Sub-Regions of: Lewistown, North Dakota, Northwest Colorado, and Wyoming and the Approved Resource Management Plans for: Billings, Buffalo, Cody, HiLine, Miles City, Pompeys Pillar National Monument, South Dakota, and Worland*, BLM/WY/PL-15/020+1610, U.S. Department of the Interior, Bureau of Land Management, Cody Field Office, Cody, WY, Sept.

³⁸ BLM, 2015, *Worland Field Office Approved Resource Management Plan*, Attachment 12 to BLM, 2015, *Record of Decision and Approved Resource Management Plan Amendments for the Rocky Mountain Region including the Greater Sage-Grouse Sub-Regions of: Lewistown, North Dakota, Northwest Colorado, and Wyoming and the Approved Resource Management Plans for: Billings, Buffalo, Cody, HiLine, Miles City, Pompeys Pillar National Monument, South Dakota, and Worland*, BLM/WY/PL-15/021+1610, U.S. Department of the Interior, Bureau of Land Management, Worland Field Office, Worland, WY, Sept.

³⁹ BLM, 2015, *Idaho and Southwestern Montana Greater Sage-Grouse Approved Resource Management Plan Amendment*, Attachment 1 to BLM, 2015, *USDI 2015 Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region including the Greater Sage-Grouse Sub-Regions of: Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah*, BLM/ID/SG/EIS-15+1610, U.S. Department of the Interior, Bureau of Land Management, Idaho State Office, Boise, ID, Sept.

⁴⁰ BLM, 2015, *Nevada and Northeastern California Greater Sage-Grouse Approved Resource Management Plan Amendment*, Attachment 2 to BLM, 2015, *USDI 2015 Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region including the Greater Sage-Grouse Sub-Regions of: Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah*, BLM/NV/NV/PL/15-14+1600, U.S. Department of the Interior, Bureau of Land Management, Nevada State Office, Reno, NV, Sept.

⁴¹ BLM, 2015, *Oregon Greater Sage-Grouse Approved Resource Management Plan Amendment*, Attachment 3 to BLM, 2015, *USDI 2015 Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region including the Greater Sage-Grouse Sub-Regions of: Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah*, BLM/OR/WA/PL-15/051+1792, U.S. Department of the Interior, Bureau of Land Management, Oregon/Washington State Office, Portland, OR, Sept.

⁴² BLM, 2016, *Record of Decision and Land Use Plan Amendment for the Nevada and California Greater Sage-Grouse Bi-State Distinct Population Segment in the Carson City District and Tonopah Field Office*, BLM/NV/CC/PL/16-04+1600, U.S. Department of the Interior, Bureau of Land Management, Nevada State Office, Reno, NV, May.

⁴³ USFS, 2015, *Greater Sage-grouse Record of Decision for Idaho and Southwest Montana, Nevada and Utah and Land Management Plan Amendments for the Ashley National Forest, Beaverhead-Deerlodge National Forest, Boise National Forest, Caribou National Forest, Challis National Forest, Curlew National Grassland, Dixie National Forest, Fishlake National Forest, Humboldt National Forest, Manti-La Sal National Forest, Salmon National Forest, Sawtooth National Forest, Targhee National Forest, Toiyabe National Forest, Uinta National Forest, Wasatch-Cache National Forest*, U.S. Department of Agriculture, Forest Service, Intermountain Region, Ogden, UT, Sept.

⁴⁴ USFS, 2015, *Greater Sage-grouse Record of Decision for Northwest Colorado and Wyoming and Land Management Plan Amendments for the Routt National Forest, Thunder Basin National Grassland, Bridger-Teton National Forest, Medicine Bow National Forest*, U.S. Department of Agriculture, Forest Service, Intermountain Region, Ogden, UT, Sept.

⁴⁵ USFS, 2016, *Greater Sage-grouse Bi-state Distinct Population Segment Forest Plan Amendment record of Decision Humboldt-Toiyabe National Forest; Alpine and Mono Counties, California; and Douglas, Esmeralda, Lyon, and Mineral Counties, Nevada*, U.S. Department of Agriculture, Forest Service, Humboldt-Toiyabe National Forest, Sparks, NV, May.

⁴⁶ A U.S. district court in Idaho recently granted a preliminary injunction against BLM/USFS implementation of the 2019 amendments. As such, the BLM will be managing GRSG consistent with the 2015/2016 plans until the court decides the merits of the challenges to the 2019 plan amendments.

⁴⁷ BLM, 2019, *Idaho Greater Sage-Grouse Record of Decision and Approved Resource Management Plan Amendment*, U.S. Department of the Interior, Bureau of Land Management, Boise, ID, Mar.

⁴⁸ BLM, 2019, *Nevada and Northeastern California Greater Sage-Grouse Record of Decision and Approved Resource Management Plan Amendment*, U.S. Department of the Interior, Bureau of Land Management, Nevada State Office, Reno, NV, Mar.

⁴⁹ BLM, 2019, *Oregon Greater Sage-Grouse Record of Decision and Approved Resource Management Plan Amendment*, U.S. Department of the Interior, Bureau of Land Management, Oregon State Office, Portland, OR, Mar.

⁵⁰ BLM, 2019, *Wyoming Greater Sage-grouse Approved Resource Management Plan Amendment and Record of Decision*, U.S. Department of the Interior, Bureau of Land Management, Wyoming State Office, Cheyenne, WY, Mar.

⁵¹ See Presidential Executive Order 13821 on Streamlining and Expediting Requests to Locate Broadband Facilities in Rural America.

⁵² BLM, 2009, *Approved Resource Management Plan Amendments/Record of Decision (ROD) for Designation of Energy Corridors on Bureau of Land Management-Administered Lands in the 11 Western States*. BLM/WO-GI-09-005-1800, Jan.

⁵³ USFS, 2009, *USDA Forest Service Designation of Section 368 Energy Corridors on National Forest System Land in Western States Decision by Secretary of Agriculture To Amend Land Management Plans Described as the Environmentally Preferred Alternative*, Jan.

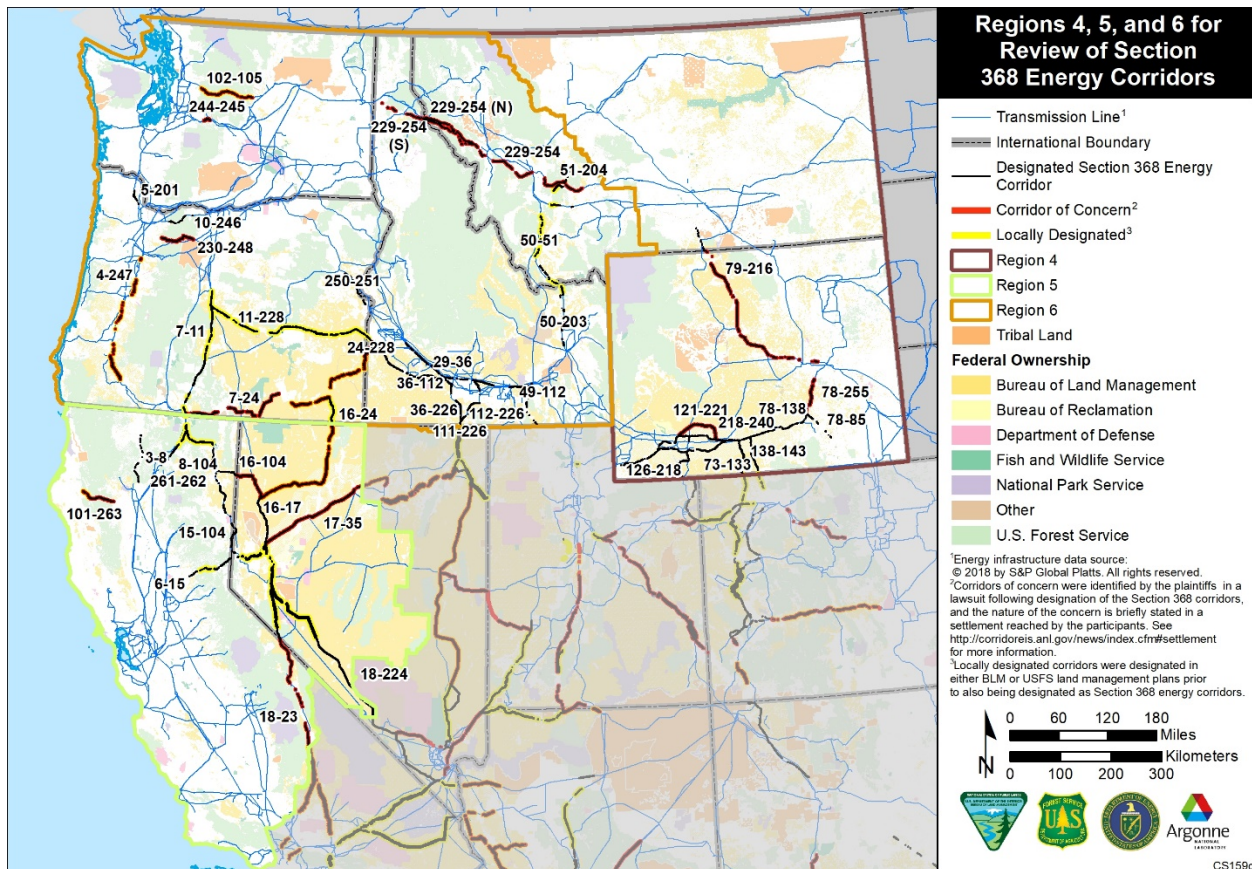
November 2020



Section 368 Energy Corridor Review

VOLUME 2 — REGIONS 4, 5, and 6

INTERAGENCY CORRIDOR MODIFICATION SUMMARIES, POTENTIAL CORRIDOR ADDITIONS AND DELETIONS



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Interagency Corridor Modification Summaries

The interagency corridor modification summaries for each of the 59 corridors in Regions 4, 5, and 6 include a summary and rationale for potential modifications (revisions & partial-deletions, corridor-specific management issues, and listed concerns to address through IOP revisions or additions.

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Corridor 3-8 (Big Bend to Tule Lake Corridor)

Agency Jurisdictions

Forest Service

Lassen National Forest
 Modoc National Forest
 Shasta-Trinity National Forest

California Counties

Modoc County
 Shasta County
 Siskiyou County

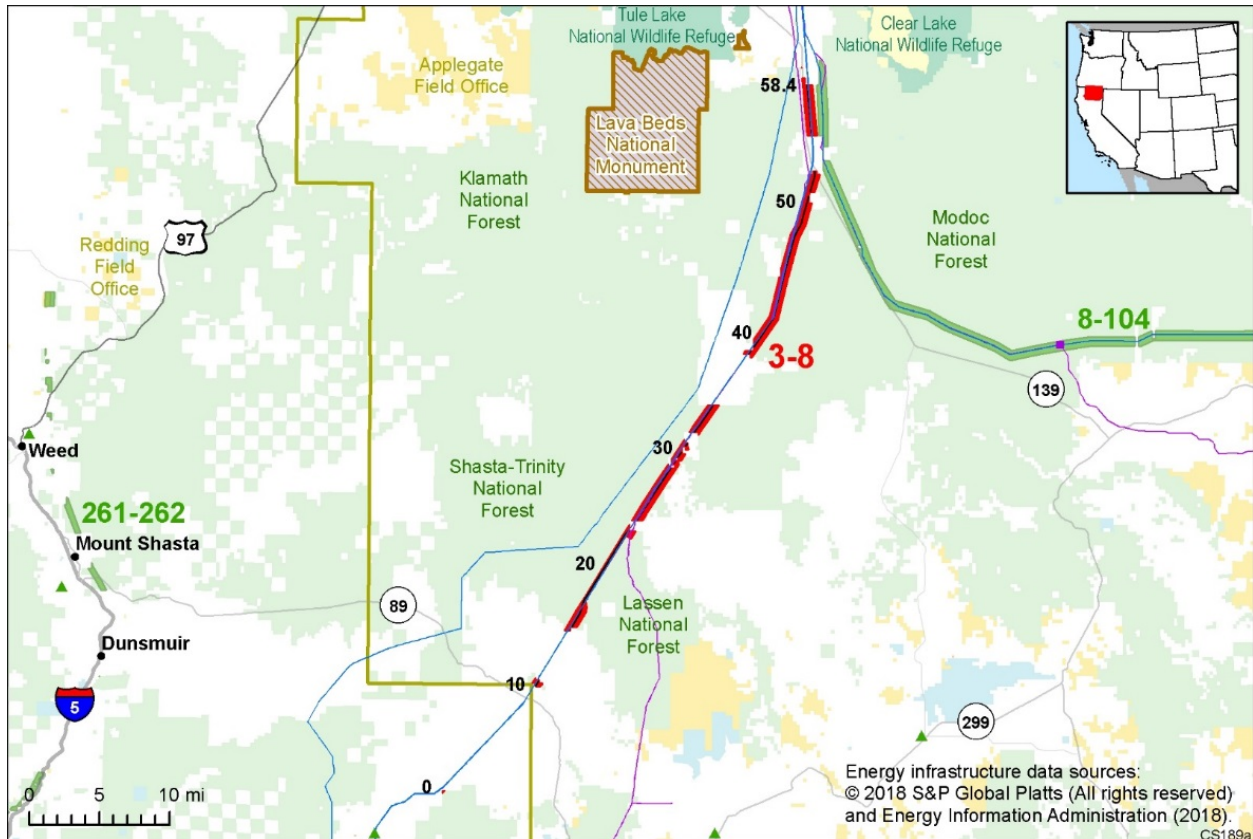


Figure 3.5-1. Corridor 3-8 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Lassen National Forest LMP (1992)
 Modoc National Forest LMP (1991)
 Shasta-Trinity National Forest LMP (1995)

Corridor width: 1,000 ft in Lassen National Forest, remainder 3,500 ft.
 Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).

- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.
 - At MP 0, delete small corridor segment that intersects the Pacific Crest NST and critical habitat for the Northern Spotted Owl
 - From MP 16 to MP 22, expand the corridor to the west to widen the corridor and avoid the Mayfield Roadless Area.
 - From MP 52 to MP 58, shift the corridor slightly to the east so that the existing infrastructure is the western border rather than the centerline to further minimize impacts on the Emigrant Trail National Scenic Byway and the Four Trails Feasibility Trail. Alternately, consider merging the corridor segment with MP 0 to MP 7 of Corridor 8-104.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 7-8 to the north), creating an interstate pathway for electrical and pipeline transmission between Oregon and California. The potential minor revisions would minimize impacts on Pacific Crest NST, Northern Spotted Owl critical habitat, the Mayfield Roadless Area, the Emigrant Trail National Scenic Byway, and the Four Trails Feasibility Trail to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 500-kV transmission line). In addition, the potential corridor addition (Wagontire Mountain) in Oregon would connect to Corridor 3-8 (via Corridor 7-11 and Corridor 7-8), creating a critical pathway from wind energy development in Oregon to load centers in California (see *Wagontire Mountain Corridor Addition Summary*).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 3-8, specific issues that would be addressed through potential IOP revisions or additions include:

- The Pacific Crest NST and the Four Trails Feasibility Study Trail intersect the corridor. Consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- The Mayfield Roadless Area and the corridor are adjacent. Consider a coordination IOP related to Roadless Areas to help minimize conflicts with the Roadless Rule.
- The corridor intersects MTRs and SUA. Adherence to the existing IOP regarding coordination with DoD would be required. Consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 3-8 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 4-247 Corvallis to Medford Corridor

Agency Jurisdictions

Bureau of Land Management

Butte Falls Field Office
 Cascades Field Office
 Grants Pass Field Office
 Siuslaw Field Office
 South River Field Office
 Swiftwater Field Office
 Upper Willamette Field Office

Oregon Counties

Douglas County
 Jackson County
 Lane County
 Linn County

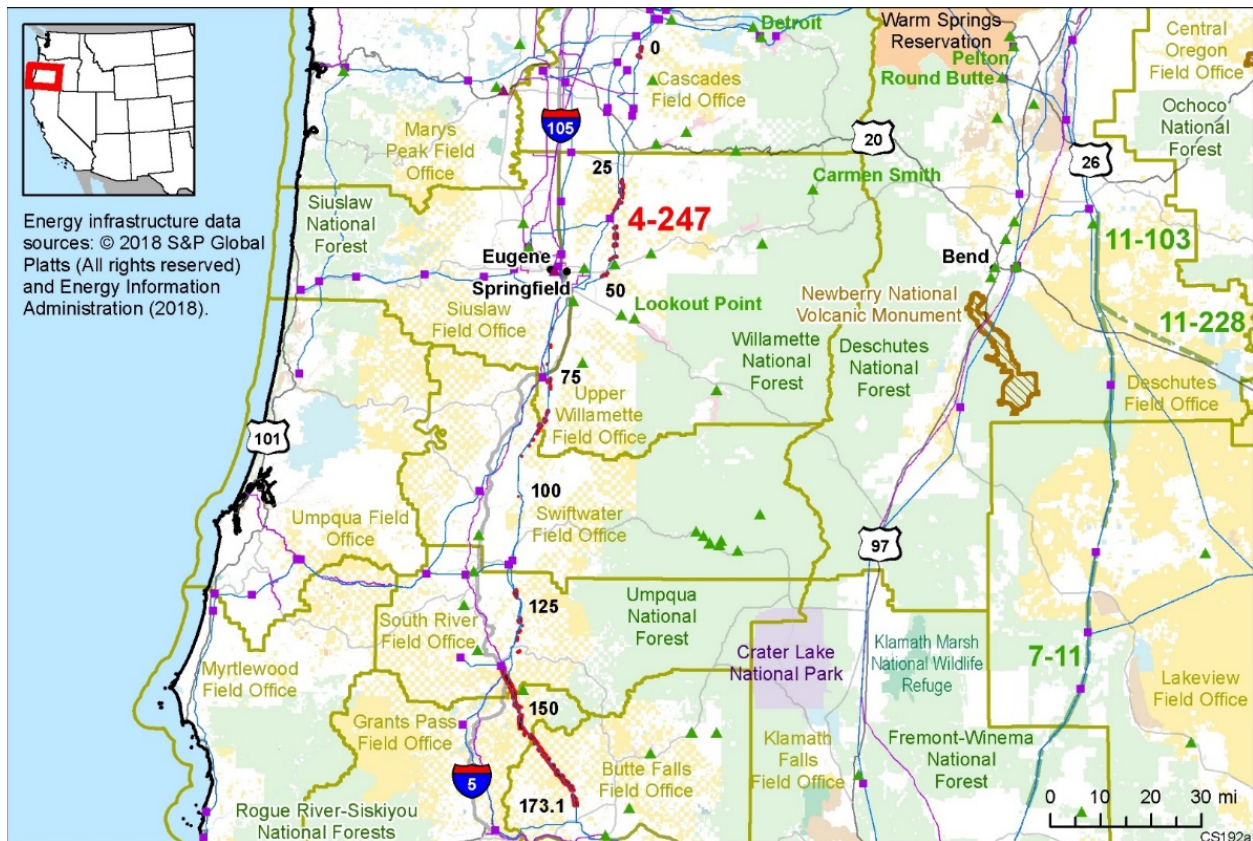


Figure 3.5-2. Corridor 4-247 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Northwestern and Coastal Oregon ROD/RMP (2016)
 Southwestern Oregon ROD/RMP (2016)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

At MP 122, shift the corridor to the east to avoid Coho Salmon critical habitat. From MP 140 to MP 143, shift the corridor to the west to limit the corridor and the critical habitat intersections to generally perpendicular crossings, which minimizes potential impacts compared to the critical habitat paralleling the corridor. Consider limiting future infrastructure to the western portion of the corridor from MP 151 to MP 152, however, options to shift the corridor at this location are limited because Coho Salmon critical habitat also occurs just west of the corridor.

At MP 136, shift the corridor east to align with the existing 500-kV transmission line to minimize the intersections with the California NHT and the Four Trails Feasibility Study Trail. Potentially, future infrastructure could be selectively located within the corridor.

The corridor intersects ROW avoidance areas which are not compatible with the corridor's purpose as a preferred location for infrastructure. It is possible that future development could occur in this corridor if it does not significantly change the characteristics of the West Fork Evans Creek Extensive Recreation Management Area.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a major north-south pathway for energy transport through western Oregon with existing substations positioned throughout the length of the corridor. The corridor was identified as a corridor of concern in the Settlement Agreement for old growth forests, critical habitat, late-successional reserves, riparian reserves, and not close enough to qualified resource areas. However, the potential minor corridor revisions would minimize impacts on Coho Salmon critical habitat, California NHT, and Four Trails Feasibility Study Trail while maintaining a preferred route for potential future energy development collocated with existing infrastructure.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- The Cow Creek Tribe has concerns in the southern portion of the corridor related to stream quality and channelization and debris for salmon movement. Agencies should engage with the Cow Creek Tribe early in the process during future land use planning or for a proposed project within the corridor.
- The southern portion of the corridor is also an area with frequent forest fires. Agencies should engage with the Oregon Department of Forestry regarding fire control.

- Almost the entire corridor overlaps with Oregon and California revested lands, and future development within the corridor would require engagement with the Association of Counties. These lands require compensatory mitigation if they are not used for forestry.
- Soil stability is an important consideration for future pipelines in this area (and issues related to geology, earthquake potential, and safety) and the corridor appears to be in the best location with respect to these factors. Seismic concerns need to be evaluated if moving the corridor to the west is considered.
- Terrain in the southern portion of the corridor is very steep and would require additional data to better identify and analyze terrain.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 4-247, specific issues that would be addressed through potential IOP revisions or additions include:

- Lands with undetermined status for wilderness characteristics intersect and are adjacent to the corridor. Agencies could consider an IOP to provide guidance on the review process for applications within corridors with incomplete inventories. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.
- The California NHT and the Four Trails Feasibility Study Trail intersect the corridor. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- An MTR – IR intersects the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies are considering a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 4-247 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 5-201 Northwest Portland Corridor

Agency Jurisdictions

Bureau of Land Management
Tillamook Field Office

Oregon Counties

Columbia County
Multnomah County
Washington County

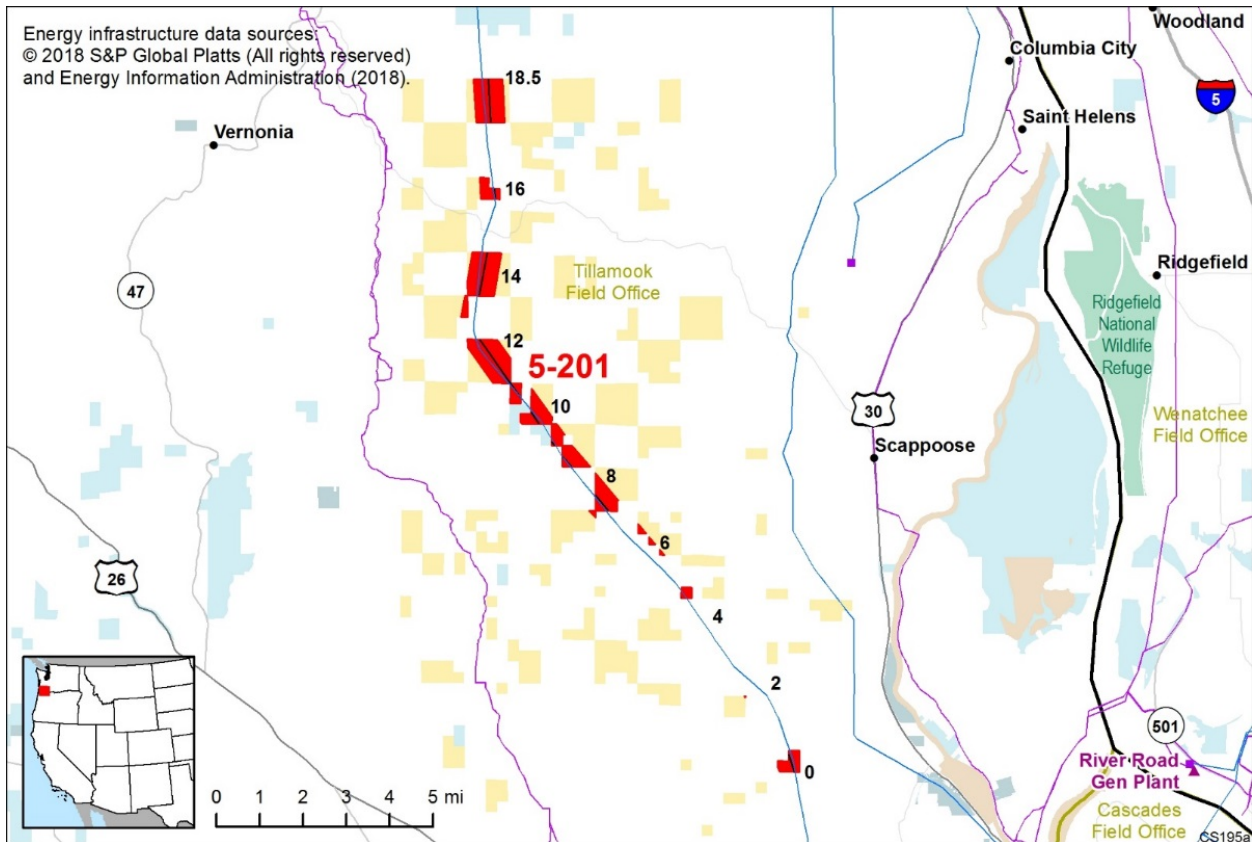


Figure 3.5-3. Corridor 5-201 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Northwestern and Coastal Oregon ROD/RMP (2016)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Modifications Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

At MP 14, shift the corridor so that the existing transmission line is the western boundary rather than the centerline to retain the corridor width on federal lands and avoid Coho Salmon critical habitat.

The corridor does not intersect the Tillamook State Forest; however, the state forest could be further avoided by shifting the corridor between MP 10 and MP 11 so that the existing transmission line is the western boundary rather than the centerline.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a north-south pathway for energy transport into Portland, Oregon along existing infrastructure. The potential minor revisions would minimize impacts on Coho Salmon critical habitat and Tillamook State Forest to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 500-kV transmission line).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 5-201, specific issues that would be addressed through potential IOP revisions or additions include:

- The Agencies could consider an IOP for habitat connectivity so that transmission projects within Section 368 energy corridors are sited and designed in a manner that minimizes impacts on habitat connectivity.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 5-201 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 6-15 Colfax to Reno Corridor

Agency Jurisdictions

Bureau of Land Management
Mother Lode Field Office

Forest Service
Humboldt-Toiyabe National Forest
Tahoe National Forest

California Counties

Nevada County
Placer County
Sierra County

Nevada County

Washoe County

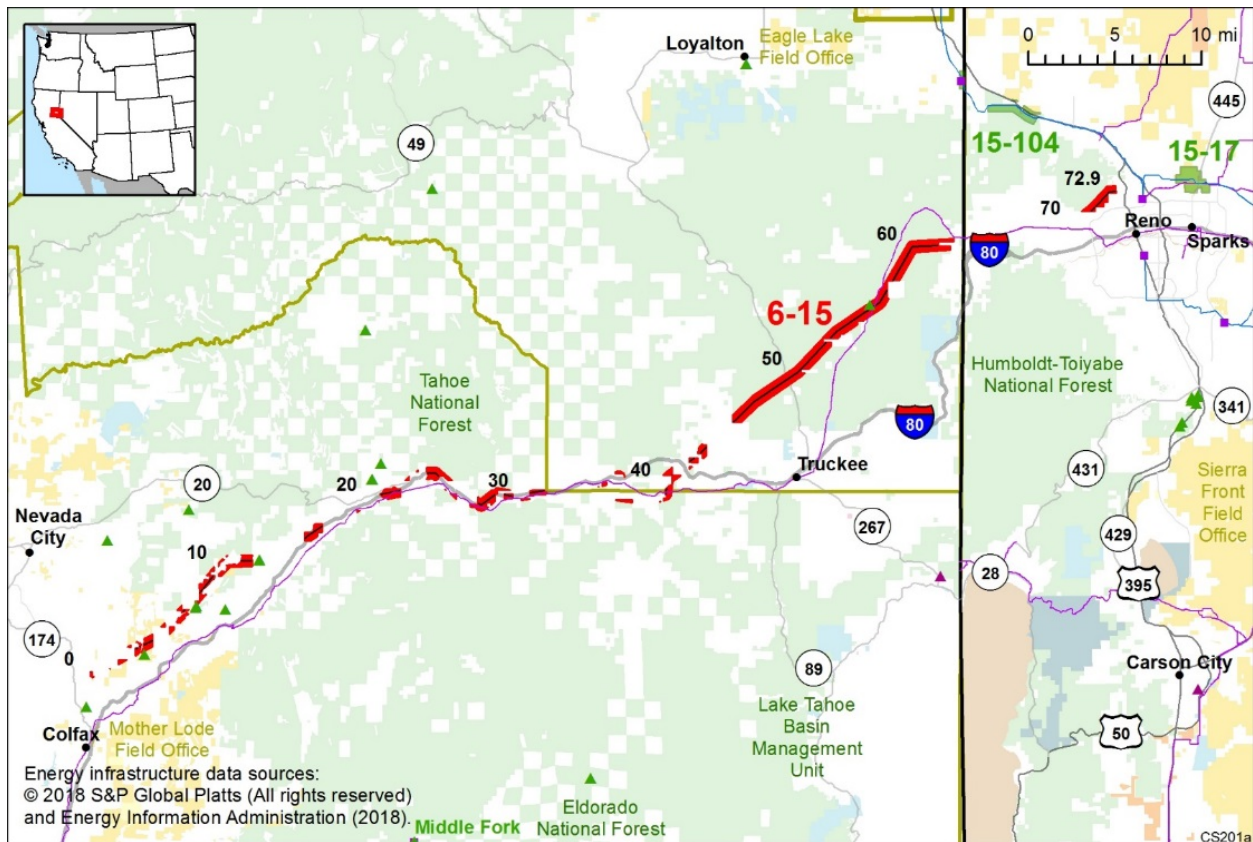


Figure 3.5-4. Corridor 6-15 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Sierra RMP/ROD (2007)
Tahoe National Forest LMP (1990)
Toiyabe National Forest LMP (1986)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

Shift corridor to minimize impacts on the California NHT or avoid the NHT at some locations. For example, at MP 21, shifting the corridor north to avoid the California NHT could also avoid a portion of the overlap with the American River SRMA. Shifting the corridor north from MP 27 to MP 31 so that existing infrastructure is the southern boundary would avoid the California NHT but would change the jurisdiction from USFS- to BLM-administered lands.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing an east-west preferred pathway for interstate energy transport, connecting the Sacramento and San Francisco metro areas with energy resources and customers in the state of Nevada and other western states. The potential minor revisions would minimize impacts on the California NHT to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing (i.e., one 69- and two 115-kV transmission lines) and planned infrastructure (i.e., a 500-kV transmission line and a Great Basin Energy 450-kV transmission line).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 6-15, specific issues that would be addressed through potential IOP revisions or additions include:

- The corridor intersects or follows the California NHT and intersects the Pacific Crest NST. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- The corridor crosses large wetland and meadow complexes containing jurisdictional wetlands and sensitive habitats. An IOP could help minimize habitat impacts.
- The corridor intersects an MTR – Slow-speed Route. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 6-15 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 7-8 Stateline Corridor

Agency Jurisdictions

Bureau of Land Management

Applegate Field Office

Klamath Falls

California County

Modoc County

Oregon County

Klamath County

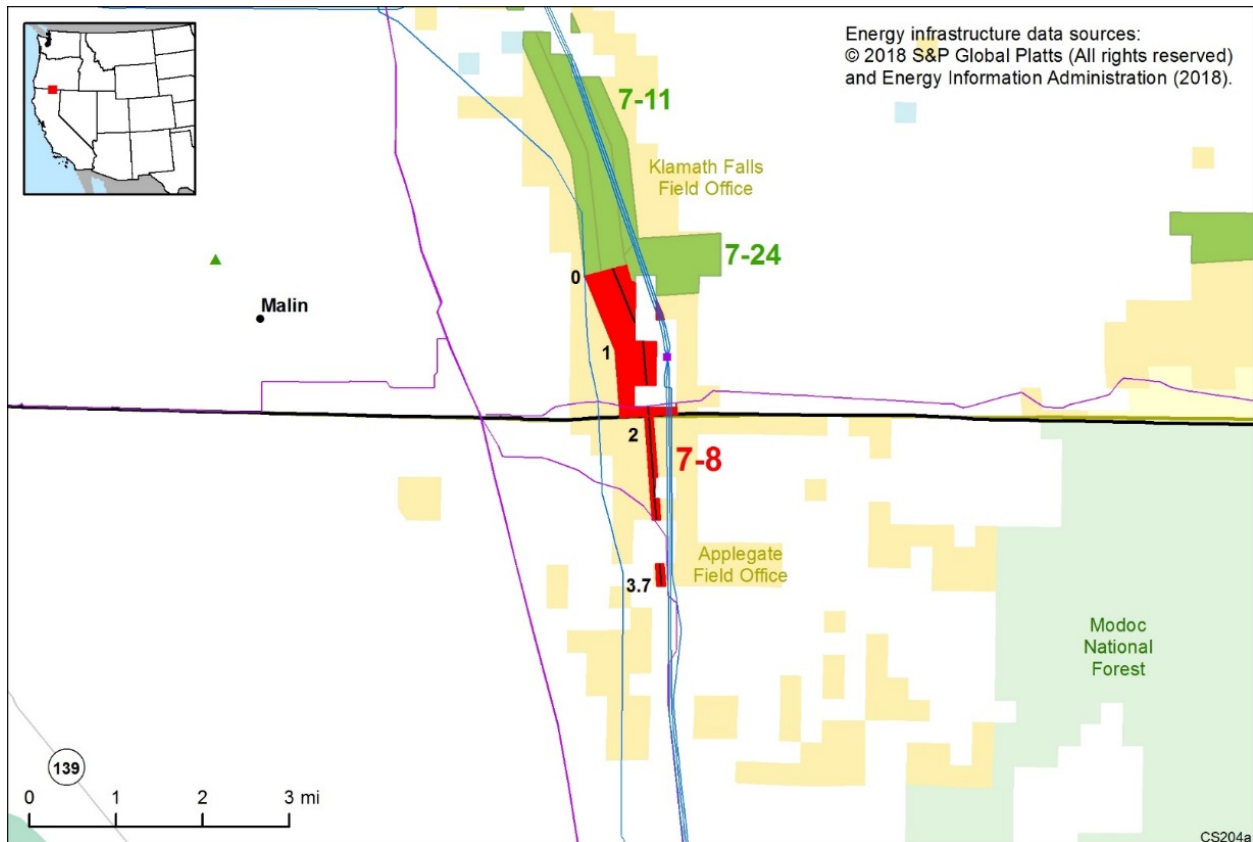


Figure 3.5-5. Corridor 7-8 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Alturas RMP (2008)

Southwestern Oregon ROD/RMP (2016)

NVCA GRSG ARMPA (2019)

Corridor width: 3,500 ft in Oregon and 500 ft in California.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Modifications Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 2 to MP 4, shift the corridor to the east side of the three transmission lines to better collocate with existing infrastructure on Federal lands.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by creating an interstate pathway between Oregon and California providing a link to other Section 368 energy corridors (Corridor 7-11 to the north, Corridor 7-24 to the east, and Corridors 8-104 and 3-8 to the south). The potential minor revisions would minimize impacts on GRSG to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with (or adjacent to) existing infrastructure.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 7-8, specific issues that would be addressed through potential IOP revisions or additions include:

- The California NST is less than one tenth of a mile from the corridor to the south. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- The corridor intersects SUA. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 7-8 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 7-11 Klamath Falls to Bend Corridor

Agency Jurisdictions

Bureau of Land Management

Deschutes Field Office
 Klamath Falls Field Office
 Lakeview Field Office
 Prineville Field Office

Oregon Counties

Deschutes County
 Klamath County
 Lake County

Forest Service

Deschutes National Forest
 Fremont-Winema National Forest

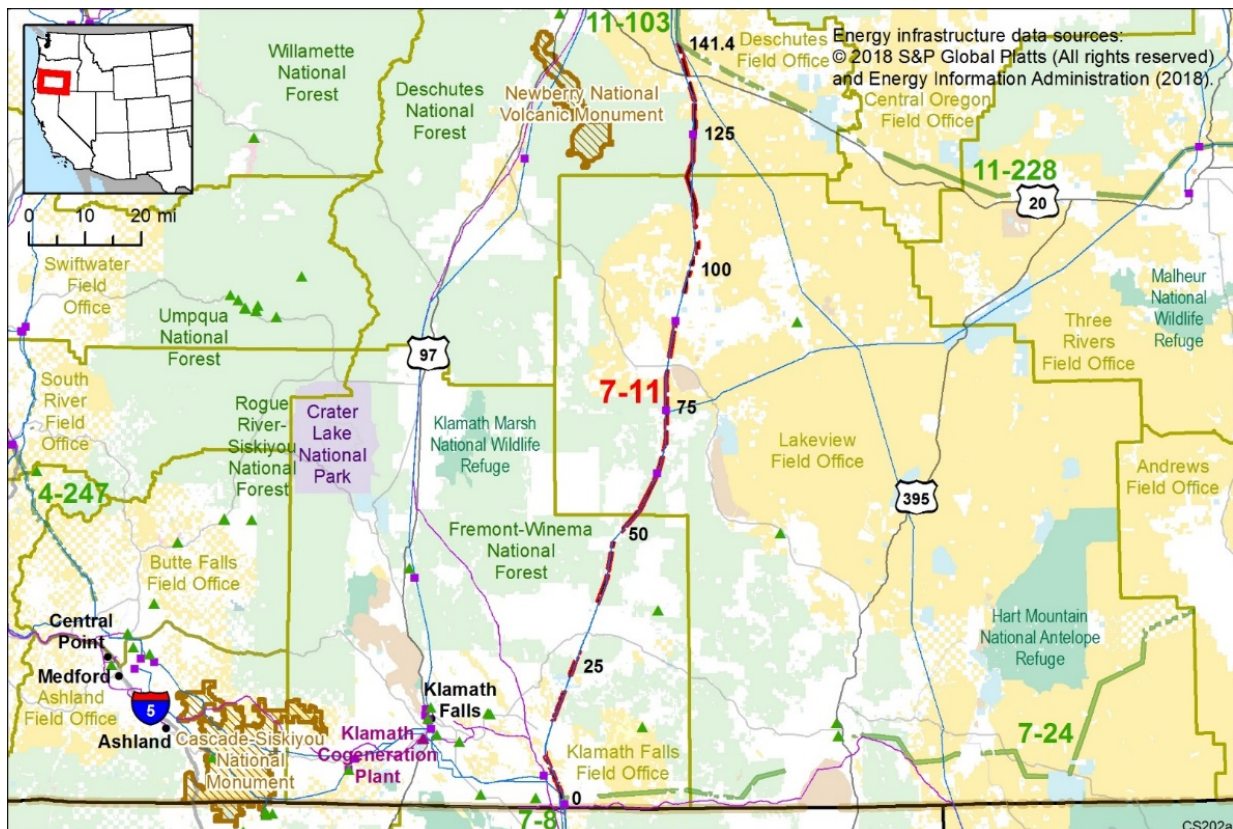


Figure 3.5-6. Corridor 7-11 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Lakeview ROD/RMP (2003)
 Southwestern Oregon ROD/RMP (2016)
 Deschutes National Forest LRMP (1990)
 Fremont National Forest LMP (1989)
 Oregon GRSG ARMPA (2019).

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).

From MP 101 to MP 120, shift the corridor to better align with existing infrastructure.

- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 77 to MP 81, shift the corridor to the east (so that the existing transmission lines are located at the western corridor boundary) to decrease but not eliminate the VRM Class II intersection and avoid lands with wilderness characteristics. Alternately, a change in the VRM class could be considered.

From MP 123 to MP 125, shift the corridor west to still collocate with the existing transmission line and avoid the GRSG PHMA.

Consider a change in the VQO class (MP 45 to MP 48, MP 57 to MP 59, and MP 61).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridors 7-8 and 7-24 to the south and Corridors 11-103 and 11-228 to the north), creating an interstate pathway for electrical and pipeline transmission between California and Oregon across BLM- and USFS-administered lands. There is interest in solar, wind, and geothermal development in the area. The potential minor revisions would minimize impacts on lands with wilderness characteristics and GRSG PHMA while maintaining a preferred route for potential future energy development better collocated with existing infrastructure for its entire length. In addition, the potential corridor addition (Wagontire Mountain) in Oregon would connect to Corridor 7-11, creating a critical pathway from wind energy development in Oregon to load centers in California (see *Wagontire Mountain Corridor Addition Summary*). Concerns within the corridor include sensitive soils, big game migration corridors and winter range, habitat for the Pumice Moonwort, Bald Eagle territory, caves, visual resources, and GRSG habitat.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 7-11, specific issues that would be addressed through potential IOP revisions or additions include:

- Lands with undetermined status for wilderness characteristics intersect and are adjacent to the corridor. Agencies could consider an IOP to provide guidance on the review process for applications within corridors with incomplete inventories. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.
- The corridor traverses GRS habitat, big game winter range, Golden Eagle nesting areas, a deer migration corridor, sensitive plant species habitat, and other areas of ecological importance. An IOP could help minimize impacts on migration corridors and habitat.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 7-11 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 7-24 Southwest Oregon Connector Corridor

Agency Jurisdictions

Bureau of Land Management

Andrews Field Office
 Klamath Falls Field Office
 Lakeview Field Office
 Vale Jordan Field Office

Oregon Counties

Klamath County
 Lake County
 Malheur County

Forest Service

Fremont-Winema National Forest

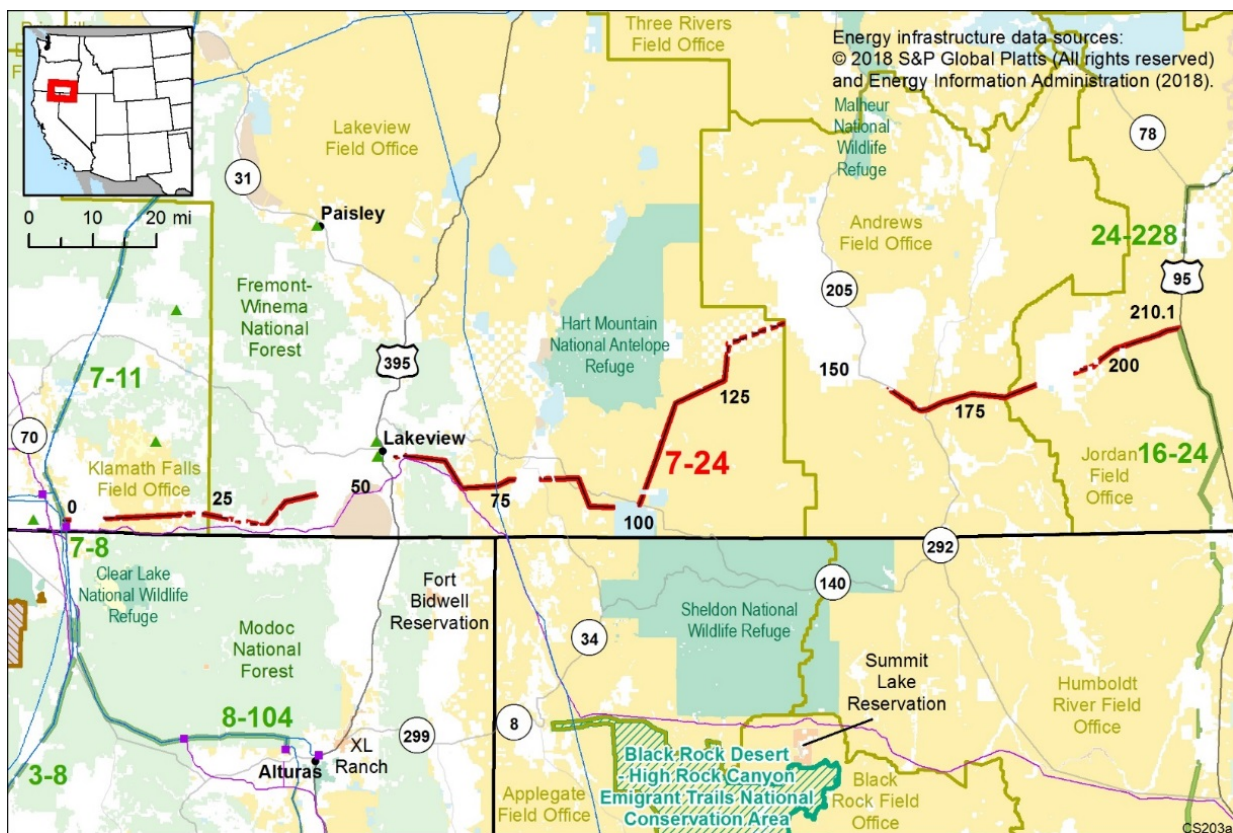


Figure 3.5-7a. Corridor 7-24 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Andrews Management Unit RMP (2005)
 Lakeview RMP (2003)
 Southeastern Oregon RMP (2002)
 Southwestern Oregon ROD/RMP (2016)
 Winema National Forest LMP (1990)
 Oregon GRSG ARMPA (2019).

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

Delete Corridor 7-24 because while the corridor provides a link to other Section 368 energy corridors (Corridor 7-8 to the west and Corridors 16-24 and 24-228 to the east), there is no demand for an east-west corridor in the area. There is no existing infrastructure within the corridor and there are many environmental and other concerns (listed below). There could also be constraints due to terrain, making future development within the corridor unlikely.

However, there is renewable energy potential (wind, geothermal, and solar) near Wagontire Mountain (south of Corridor 11-228 and east of Corridor 7-11). In order to transmit the energy to load centers, there is a need for a north-south pathway from the Wagontire/Burns area into California that cannot be met through Corridors 11-228 and 7-11. This need could be met through a new north-south corridor from Burns, Oregon heading south/southwest along the existing 500-kV transmission line to connect to Corridor 7-11 (see *Wagontire Mountain Corridor Addition Summary*) (Figure 3.5-7c).

The following concerns were identified during the stakeholder workshops:

- Lands with wilderness characteristics, visual resources, undisturbed areas, Steens Mountain Wilderness, GRSG GHMA and PHMA, and cultural resources.
- Connectivity, access, and private land issues (e.g., to the east of Steens Mountain Wilderness).

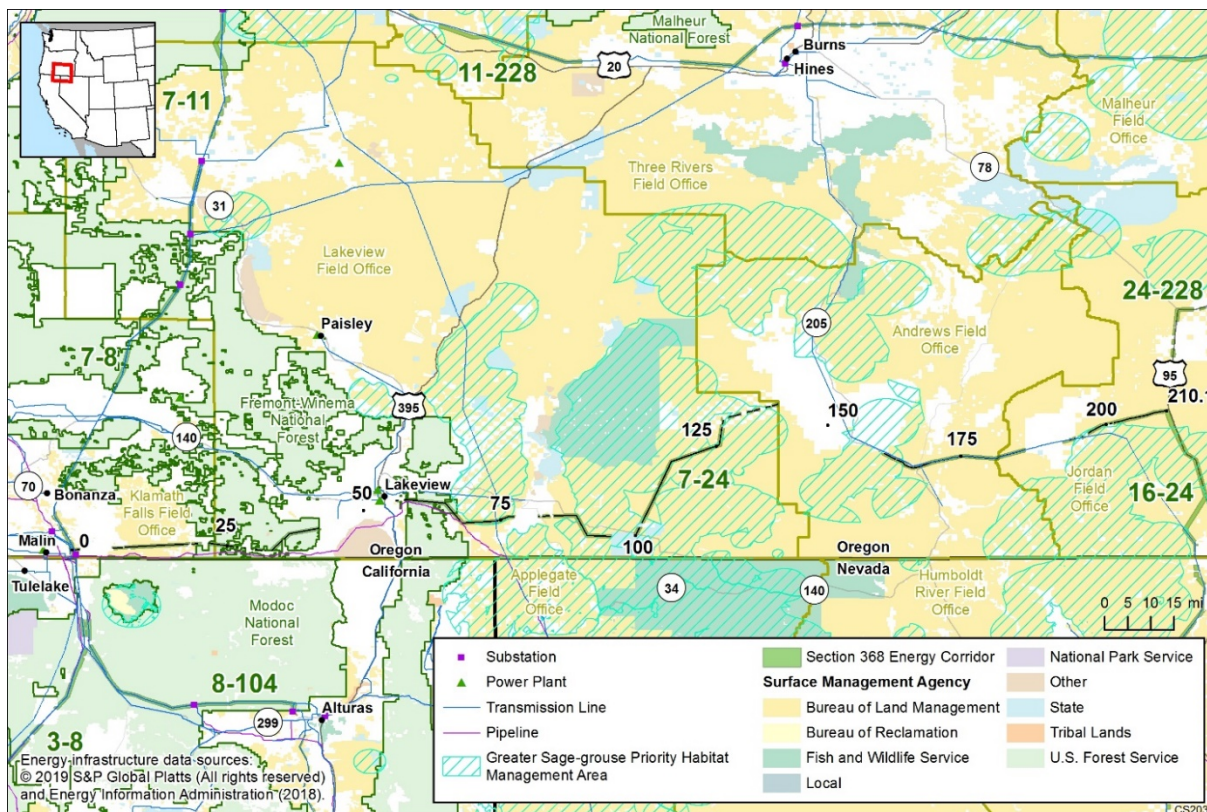


Figure 3.5-7b. Corridor 7-24, as designated

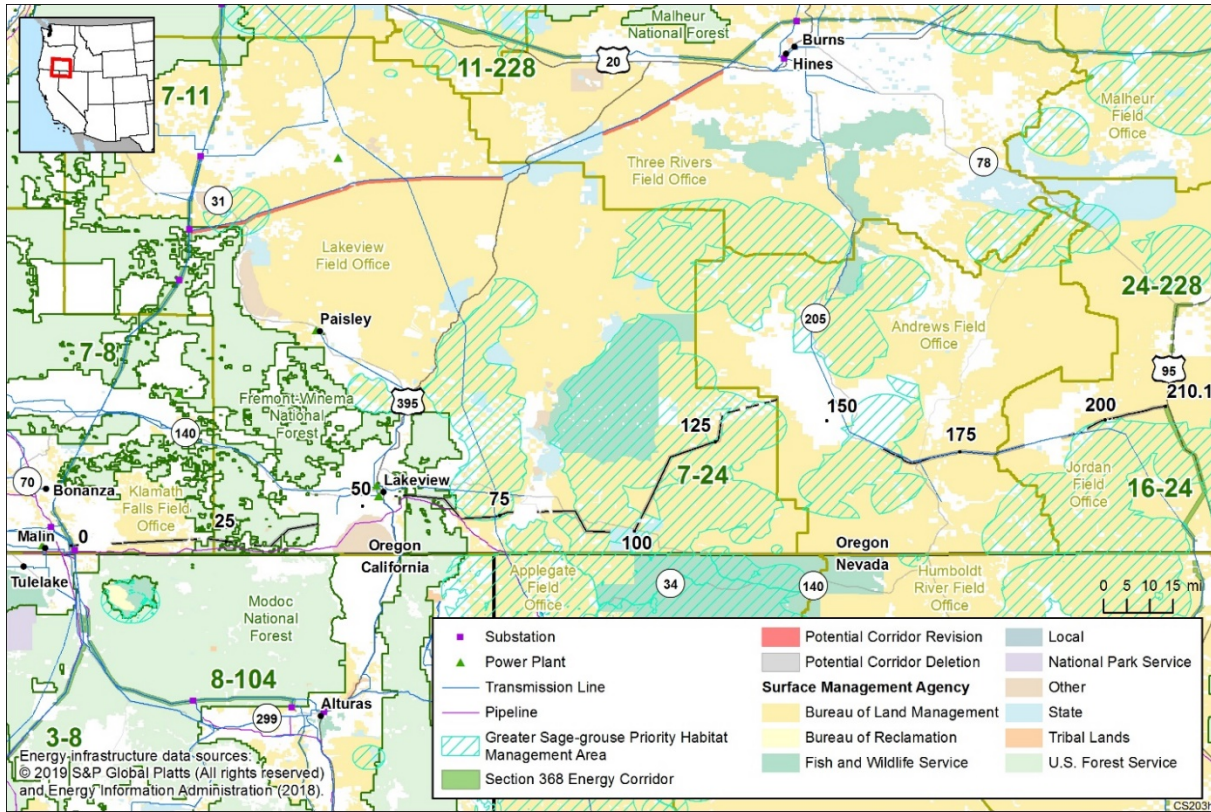


Figure 3.5-7c. Corridor 7-24 Potential Deletion

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 7-24 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 8-104 Tule Lake to Alturas Corridor

Agency Jurisdictions

Bureau of Land Management
Applegate Field Office

Forest Service
Modoc National Forest

California Counties

Lassen County

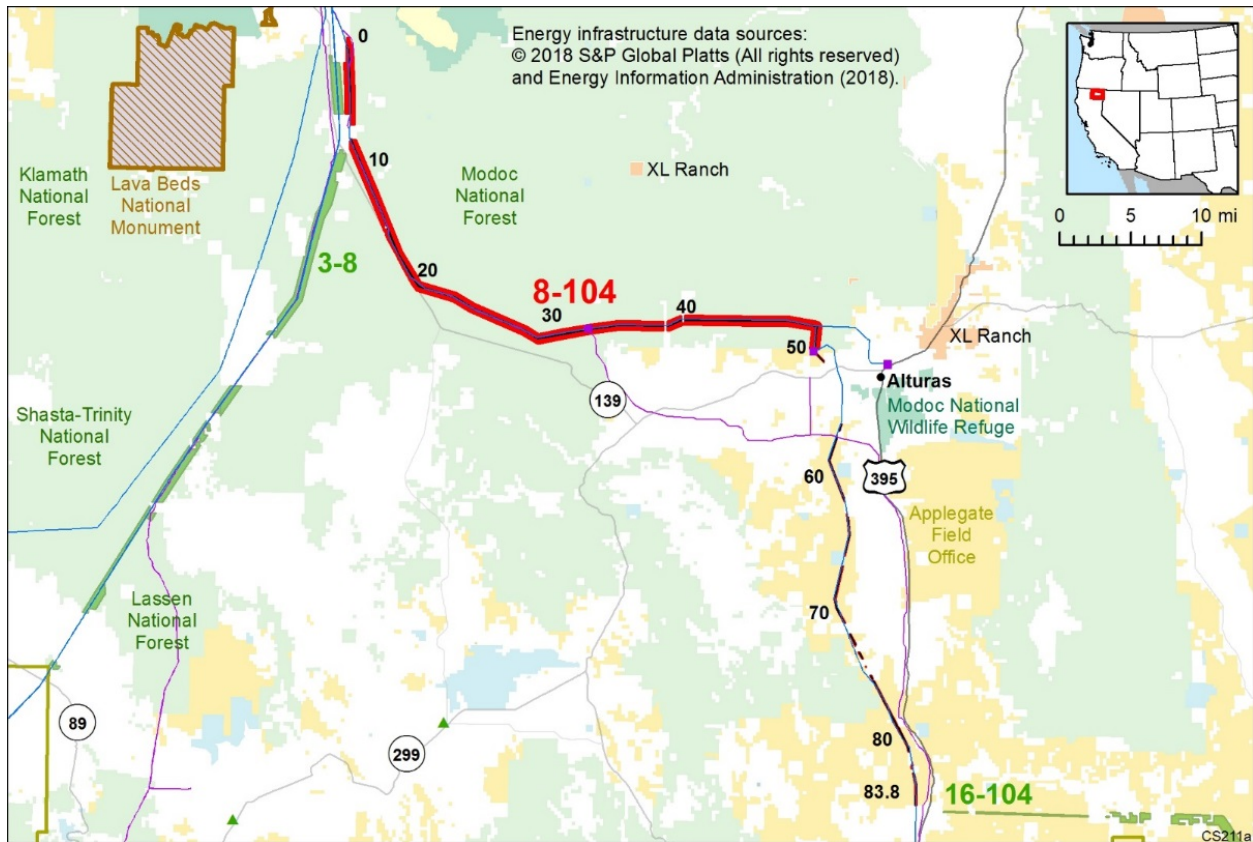


Figure 3.5-8. Corridor 8-104 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

- Alturas RMP (2008)
- Modoc National Forest LMP (1991)
- NVCA GRSG ARMPA (2019)

Corridor width: 500 ft in Lassen County and 3,500 ft in Modoc County.
Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Modifications Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).

From MP 70 to MP 75, shift the corridor west to collocate with existing 345-kV transmission line on BLM-administered land.

- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 13 to MP 18, shift the corridor slightly east so that the existing transmission line is the western boundary of the corridor to further minimize impacts on both the Four Trails Feasibility Study Trail and the Emigrant Trail National Scenic Byway while maintaining the corridor width in the Modoc National Forest. This shift would also further avoid the Damon Butte Roadless Area that is adjacent to the corridor from MP 14 to MP 18.

VRM Class II areas and the corridor intersect. Areas with VRM Class II designation may not be compatible with future overhead transmission line development; however, the corridor is collocated with an existing transmission line. Consider a change in the VRM class.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a pathway for energy transport across the Modoc National Forest. The corridor connects multiple Section 368 energy corridors (Corridor 7-8 to the north and Corridor 3-8 to the southwest), creating a continuous corridor network across BLM- and USFS-administered lands in northern California. The potential minor revisions would minimize impacts on the Damon Butte Roadless Area, the Four Trails Feasibility Study Trail, and the Emigrant Trail National Scenic Byway to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 8-104, specific issues that would be addressed through potential IOP revisions or additions include:

- Four Trails Feasibility Trail and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- MTR-VR, Slow-speed Route, and SUA intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 8-104 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 10-246 Dalles-Portland Corridor

Agency Jurisdictions

Bureau of Land Management

Cascades Field Office

Forest Service

Mt. Hood National Forest

Oregon Counties

Clackamas County

Hood River County



Figure 3.5-9. Corridor 10-246 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Northwestern and Coastal Oregon RMP (2016)

Mt. Hood National Forest LMP (1990)

Corridor width: 1,320 ft and 3,500 ft on BLM-administered and 1,320 ft on USFS-administered lands.

Designated use: electric transmission only.

Potential Corridor Modifications Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 21 to MP 23, shift the corridor slightly to the north so that the existing transmission line is the southern border of the corridor to further avoid the Sandy River WSR and Coho Salmon critical habitat (corridor would still be located within the avoidance area).

Consider a change in the VRM class where the corridor intersects VRM Class II areas (MP 25 to MP 34). Areas with VRM Class II designation may not be compatible with future overhead transmission line development; however, the corridor is collocated with existing transmission lines.

Consider a change in the VQO designation or shift some segments of the corridor to minimize where the corridor intersects VQO area (MP 12 to MP 14, and MP 17 to MP 22).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a pathway for electricity transmission through Mt. Hood National Forest in Oregon into Portland. The corridor provides a viable link between energy supply and areas of high demand from Columbia River hydroelectric generation to Portland. Electric-only and reduced width restrictions on some portions of this corridor are to protect fragile soils and community watershed values and are consistent with the existing land use plan. The potential minor revisions would minimize impacts on the Sandy River WSR, Coho Salmon critical habitat, and visual resources to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 230- and 500-kV transmission lines).

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Corridor interests the Sandy River WSR segment and is located within the Bull Run watershed which is the primary drinking water supply for the City of Portland.
- Change width of entire corridor to 3,500 ft (versus 1,320 ft currently in some locations) to consolidate development and decrease impacts.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 10-246, specific issues that would be addressed through potential IOP revisions or additions include:

- The Pacific Crest NST and the Oregon Trail NHT intersect the corridor. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- The Lake Roadless Area is adjacent to the corridor. The addition of an agency coordination IOP related to Roadless Areas could help in minimizing conflicts with the Roadless Rule.
- The Agencies could consider an IOP for habitat connectivity so that transmission projects within Section 368 energy corridors are sited and designed in a manner that minimizes impacts on habitat connectivity.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 10-246 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 11-103 Prineville Corridor

Agency Jurisdictions

Bureau of Land Management
Deschutes Field Office

Oregon Counties

Cook County
Deschutes County

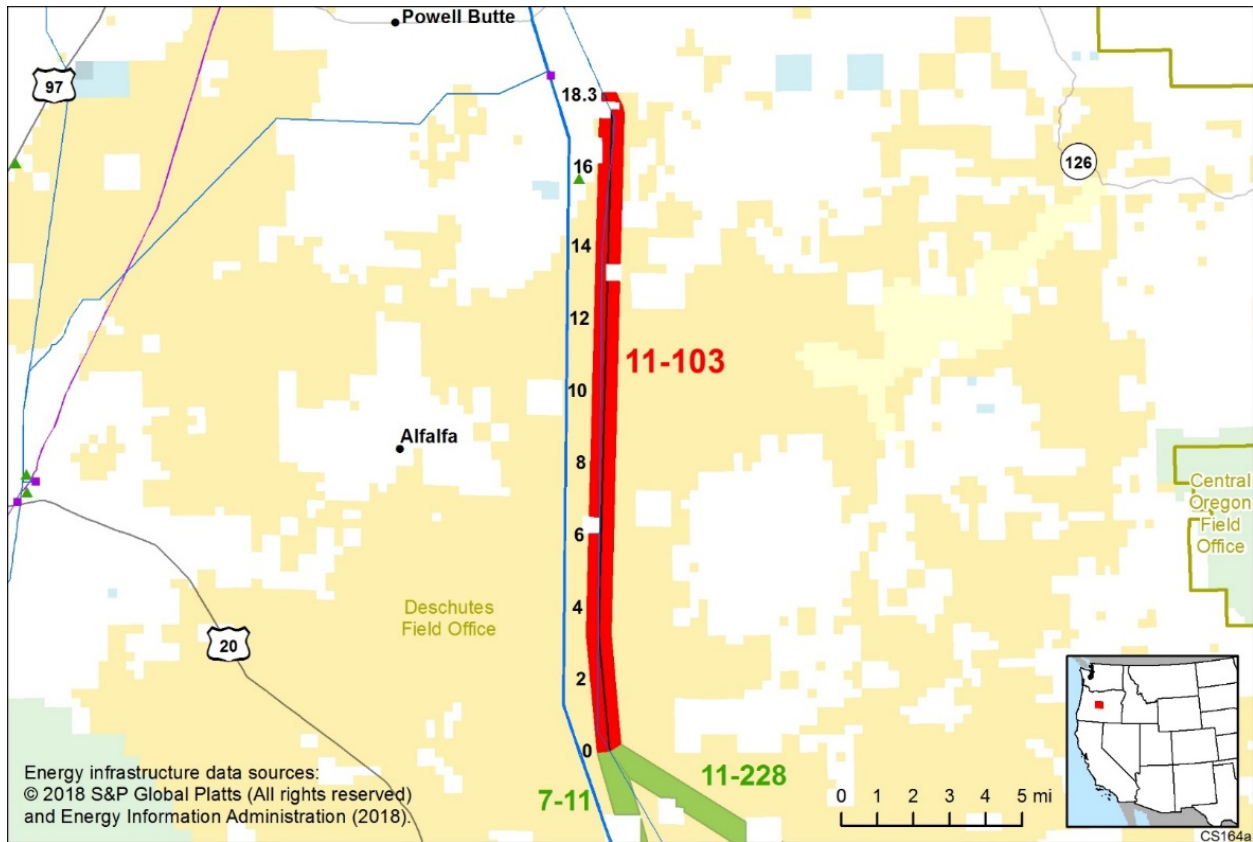


Figure 3.5-10. Corridor 11-103 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Upper Deschutes RMP (2005)
Oregon GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Modifications Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 0 to MP 1, shift the corridor west to avoid GRSB GHMA area.

From MP 14 to MP 15, shift the corridor west to avoid VRM Class II area, consider a change in the VRM class, or restrict new infrastructure to underground-only which would alleviate some visual concerns.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to Corridor 7-11 to the south and Corridor 11-228 to the east, contributing to a continuous interstate corridor network across BLM-administered lands south into California and east across Oregon into Idaho. The potential minor revisions would minimize impacts on GRSB GHMA and visual resources to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 1000-kV transmission line).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 11-103, no potential IOP revisions or additions have been identified.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 11-103 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 11-228 Bend to Boise Corridor

Agency Jurisdictions

Bureau of Land Management

Central Oregon Field Office
 Deschutes Field Office
 Malheur Field Office
 Owyhee Field Office
 Three Rivers Field Office

Idaho County

Owyhee County

Oregon Counties

Cook County
 Deschutes County
 Harney County
 Lake County
 Malheur County

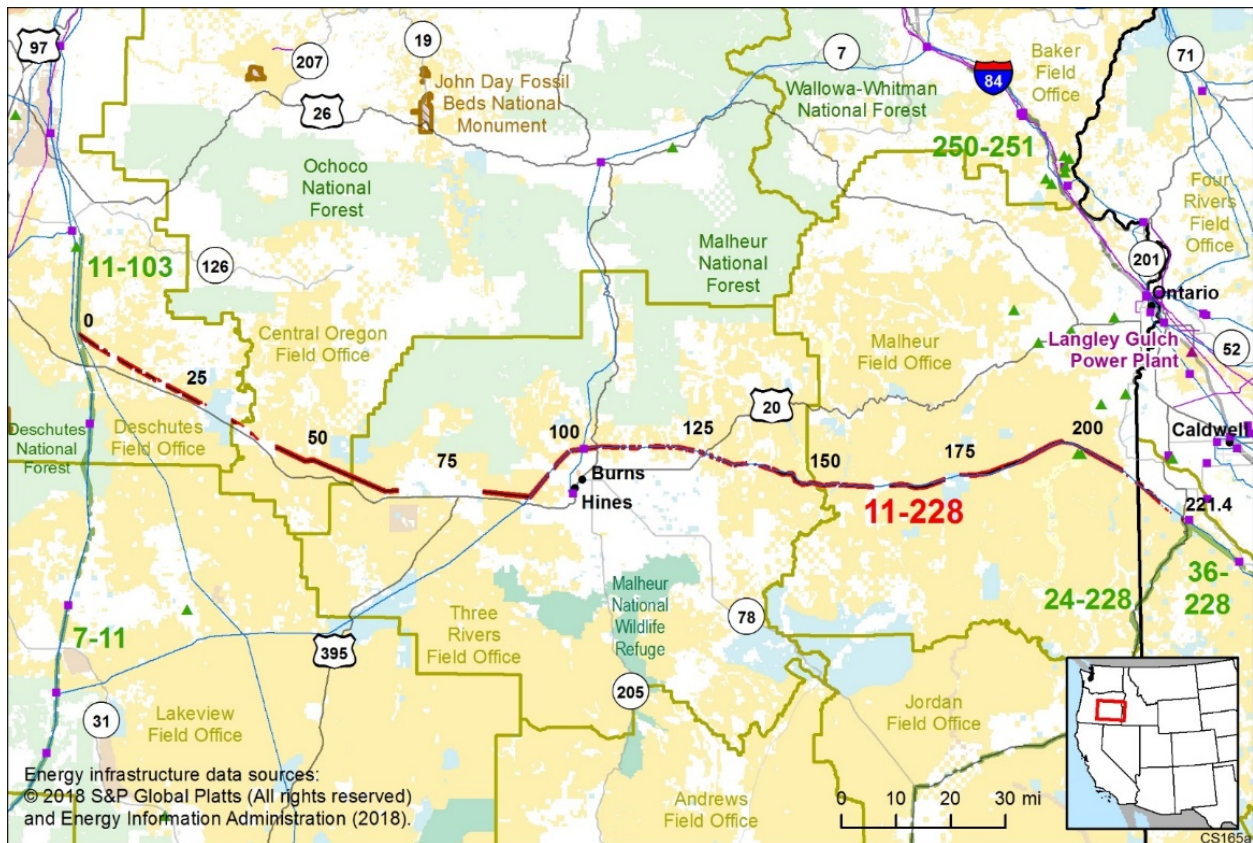


Figure 3.5-11. Corridor 11-228 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Brothers/LaPine RMP (1989)
 Owyhee RMP (1999)
 Southeastern Oregon RMP (2002)
 Three Rivers RMP/ROD (1992)

Upper Deschutes RMP (2005)
IDMT GRSG ARMPA (2019)
Oregon GRSG ARMPA (2019)

Corridor width: variable width ranging from 1,500 ft to 3,500 ft.
Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).

From MP 0 to MP 4 shift the corridor along existing transmission line.

- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 61 to MP 65, MP 149 to MP 151, MP 162 to MP 171, and MP 177 to MP 188 shift the corridor south; from MP 192 to MP 194 shift the corridor north to avoid lands with wilderness characteristics.

Consider a change in the VRM class where the corridor crosses VRM Class II (MP 32 to MP 42, MP 148 to MP 154, MP 196 to MP 200).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridors 7-11 and 11-103 to the west and Corridors 24-228 and 36-228 to the east), creating a continuous corridor network across BLM-administered lands from eastern Oregon into Idaho. The potential minor revisions would minimize impacts on lands with wilderness characteristics and visual resources to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 115-kV transmission line from MP 0 to MP 90 and a 500-kV transmission line from MP 90 to MP 220). The Boardman (Longhorn) to Hemingway Transmission (B2H), a 500-kV planned transmission line, follows and runs adjacent to the corridor from MP 207 to MP 221.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 11-228, specific issues that would be addressed through potential IOP revisions or additions include:

- Lands with undetermined status for wilderness characteristics intersect the corridor. Agencies could consider an IOP to provide guidance on the review process for applications within corridors with incomplete inventories. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.
- The Four Trails Feasibility Study Trail and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

- Wildlife species connectivity has been identified within the corridor. The Agencies could consider an IOP for habitat connectivity so that transmission projects are sited and designed in a manner that minimizes impacts on habitat connectivity.
- MTR-VR, IR, and SUA intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 11-228 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 15-17 Reno Connector Corridor

Agency Jurisdictions

Bureau of Land Management

Humboldt River Field Office
Sierra front Field Office

Nevada Counties

Storey County
Washoe County

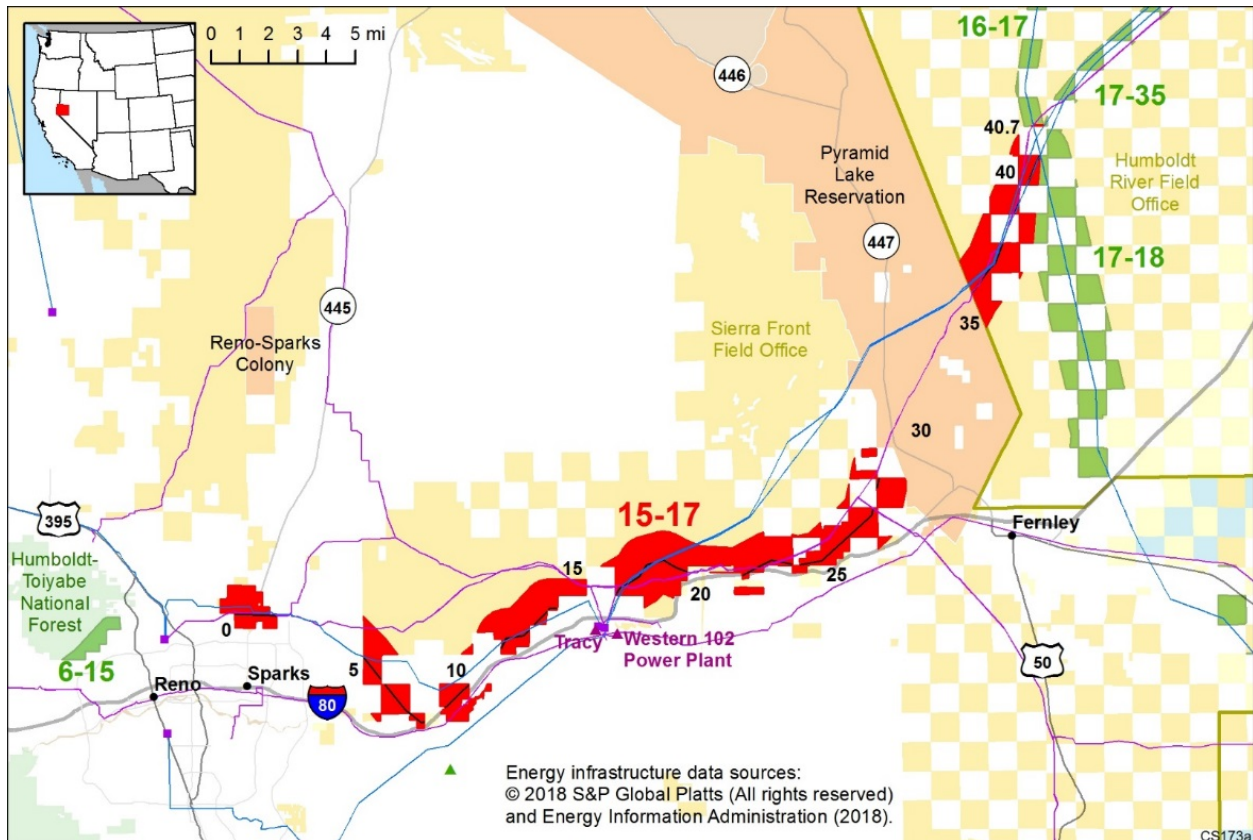


Figure 3.5-12. Corridor 15-17 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Carson City Field Office Consolidated RMP (2001)
Winnemucca District Planning Area RMP (2015)
NVCA GRSG ARMPA (2019)

Corridor width: 10,560 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. There is interest in solar energy in the area. Currently, there is one proposed PV solar project (Dodge Flat Solar) near Wadsworth, and Apple Inc. is also proposing to construct a large PV solar field on private land near Tracy, Nevada that does not use public lands. The corridor crosses GRSG GHMA and PHMA, ROW avoidance areas that may not be compatible with the corridor's purpose as a preferred location for infrastructure. However, the corridor is collocated with several existing transmission lines and pipelines and promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 6-15 to the west and Corridors 16-17 and 17-18 to the east), creating an interstate pathway for electrical and pipeline transmission from California across northwestern Nevada.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- The south end of the corridor crosses Pyramid Lake Paiute Reservation lands. There is an existing natural gas pipeline collocated with the corridor in this location.
- The Agencies should engage with local jurisdictions and the Pyramid Lake Paiute Tribe early in the process during future land use planning or for a proposed project within the corridor.
- The corridor was an alternative in the Nevada Department of Transportation Study for the proposed Interstate 11 corridor for collocated utilities and highway facilities.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 15-17, specific issues that would be addressed through potential IOP revisions or additions include:

- The California NHT and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- MTR-VR and the corridor intersect. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 15-17 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 15-104 Honey Lake Corridor

Agency Jurisdictions

Bureau of Land Management

Applegate Field Office
Eagle Lake Field Office
Sierra Front Filed Office

Forest Service

Humboldt-Toiyabe National Forest

California Counties

Lassen County
Sierra County

Nevada County

Washoe County

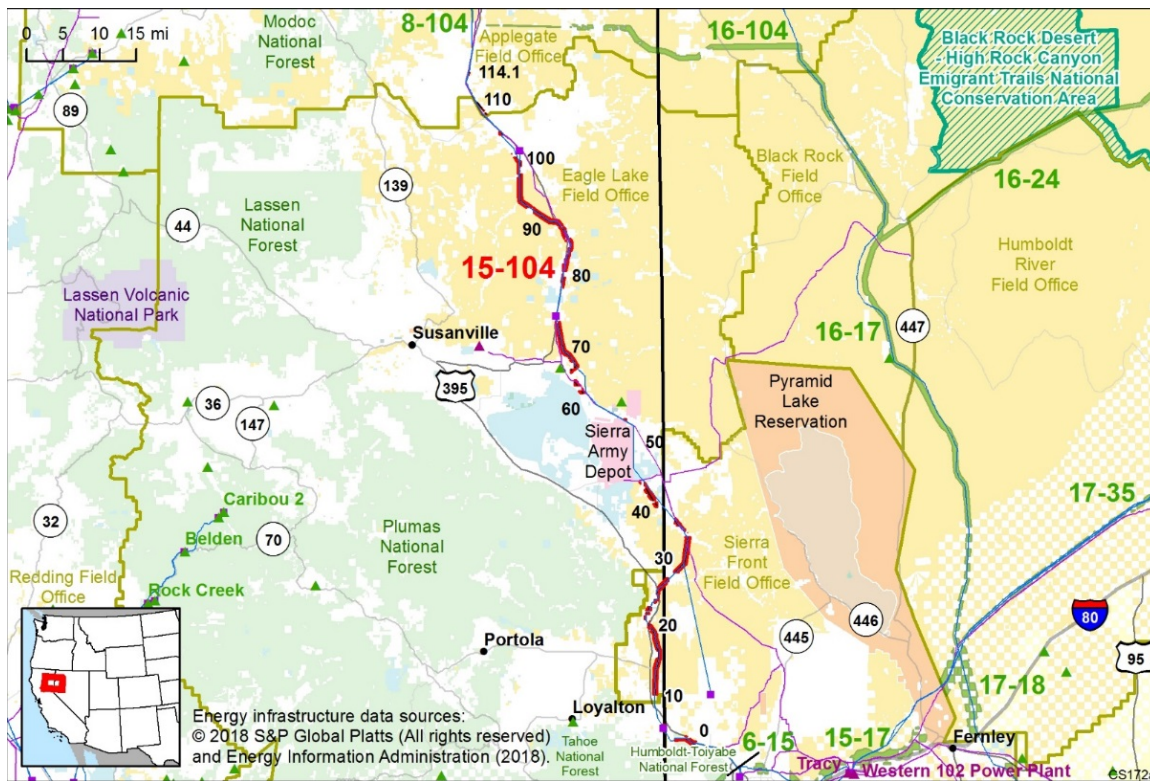


Figure 3.5-13. Corridor 15-104 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

- Alturas RMP (2008)
- Carson City Field Office Consolidated RMP (2001)
- Eagle Lake ROD (2008)
- Toiyabe National Forest LMP (1986)
- NVCA GRSG ARMPA (2019)

Corridor width: 500 ft in Applegate Field Office, 3,500 ft in remainder.
Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Modifications Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

At MP 10 and MP 26, shift the corridor east of the existing transmission line to avoid critical habitat for Webber's Ivesia.

From MP 40 to MP 44, shift the corridor northeast to more closely follow existing transmission and decrease intersections with the Fort Sage SRMA (OHV Area).

From MP 71 to MP 73, consider a change in the VRM Class II area within the corridor.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to multiple Section 368 energy corridors, creating a continuous corridor network across BLM- and USFS-administered lands between Reno, Nevada, and California, an important pathway for transmitting renewable energy. There is an application for a gen-tie transmission line to connect the proposed Fish Springs Solar Project (a PV solar project that would be constructed on private lands) to the existing transmission line within the corridor. The proposed Bordertown to California 120-kV transmission line would be located at the substation at MP 5 and would utilize approximately 0.4 miles of the corridor. Future development within the corridor could be limited between MP 107 and MP 114 because of the reduced corridor width. The potential minor revisions would minimize impacts on the Fort Sage SRMA and Webber's Ivesia critical habitat to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 345-kV transmission line).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 15-104, specific issues that would be addressed through potential IOP revisions or additions include:

- The California NHT and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- The corridor crosses an area with a large amount of big game migration in the winter. The Agencies could consider an IOP that minimizes impacts on habitat connectivity.
- MTR-VR and Slow-speed Route intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 15-104 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 16-17 Pyramid Lake Corridor

Agency Jurisdictions

Bureau of Land Management

Black Rock Field Office
Humboldt Field Office

Nevada Counties

Churchill County
Pershing County
Washoe County

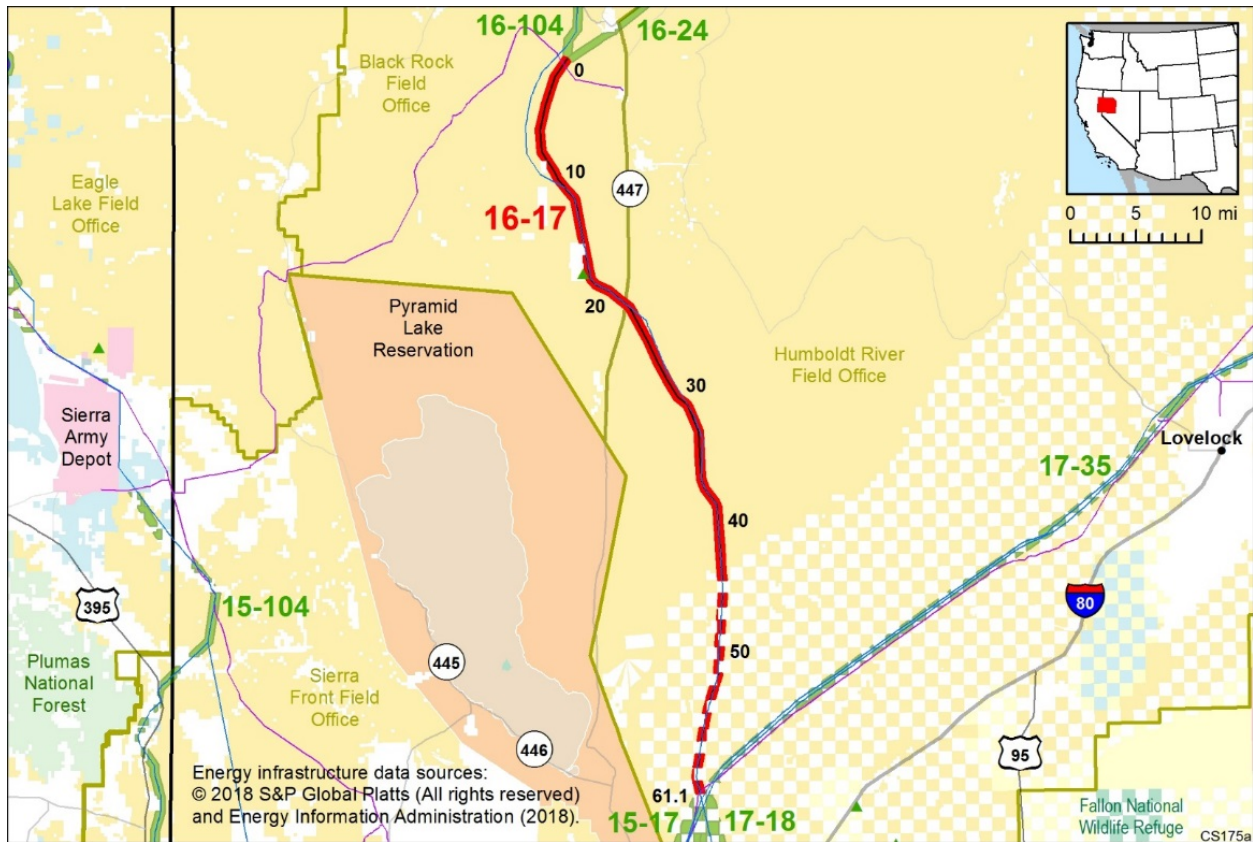


Figure 3.5-14. Corridor 16-17 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Winnemucca District Planning Area RMP (2015)
NVCA GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 22 to MP 30, shift the corridor to the west to minimize potential impacts on the Mount Limbo WSA and VRM Class I area.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridors 15-17 and 17-18 to the south, Corridors 16-104 and 16-24 to the north, and Corridor 17-35 to the east), creating an interstate pathway for electrical and pipeline transmission through western Nevada into Oregon. The existing geothermal plant at MP 18 may expand, and a small power line may be added to export energy from the geothermal plant to an existing substation. The potential minor revision would minimize impacts on the WSA and visual resources to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 1,000-kV transmission line).

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- The corridor was an alternative in the Nevada Department of Transportation Study for the proposed Interstate 11 corridor for collocated utilities and highway facilities.
- GRSG concerns for future development within the corridor can be avoided by staying in the valley.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 16-17, specific issues that would be addressed through potential IOP revisions or additions include:

- MTR-IR and VR intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 16-17 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 16-24 Black Rock Desert to Oregon Corridor

Agency Jurisdictions

Bureau of Land Management

Black Rock Field Office
Humboldt Field Office
Vale Jordan Field Office

Nevada Counties

Humboldt County
Pershing County
Washoe County

Oregon County

Malheur County

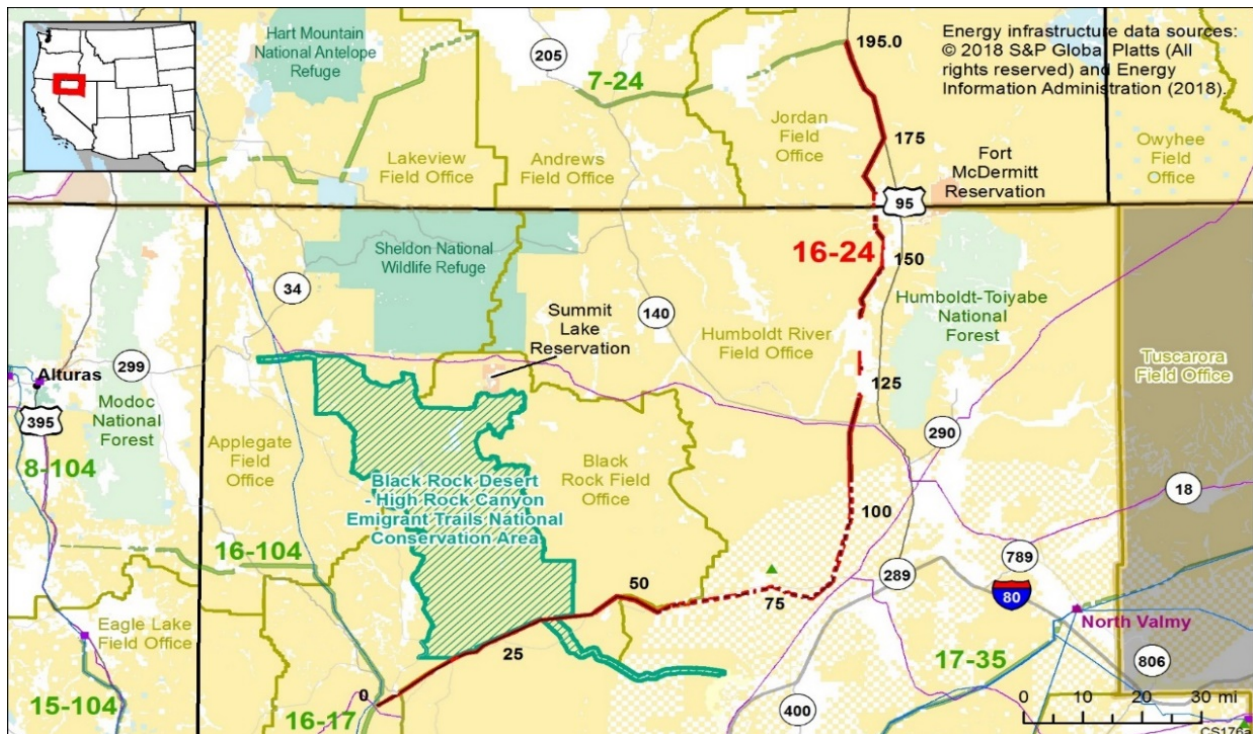


Figure 3.5-15. Corridor 16-24 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

- Black Rock Desert-High Rock Canyon Emigrant Trails NCA and Associated Wilderness, and Other Contiguous Lands in Nevada ROD and RMP (2004)
- Southeastern Oregon RMP (2002)
- Winnemucca District Planning Area RMP (2015)
- NVCA GRSG ARMPA (2019)
- Oregon GRSG ARMPA (2019)

Corridor width: 2,640 ft from MP 0 to MP 41, remainder 3,500 ft.
Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).

From MP 0 to MP 12, shift the corridor along existing transmission line. (Although this route would no longer connect directly to Corridors 16-17 and 16-104, a new connection could be established from MP 0.5 of Corridor 16-17 along the existing pipeline route. If this route is implemented, the town of Empire should be avoided.)

From MP 44 to MP 56, MP 115 to MP 130, and MP 154 to MP 160, shift the corridor along the existing transmission line.

- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

- Implement minor adjustments to avoid jurisdictional concerns.

Additional corridor revisions to avoid large checkerboard area between MP 56 and MP 105 could be considered at the project-specific level, in coordination with local government and landowners.

- Extend corridor north to connect to Corridor 24-228 along highway. This potential corridor extension would overlap the Boden Hills WSA and the Alvord Desert WSA; however, this pathway is along a major shipping route on Highway 95 and an airport runway is located adjacent to the WSA as well.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridors 16-17 and 16-104 to the west and Corridors 7-24 and 24-228 to the north), creating an interstate pathway for electrical and pipeline transmission from Nevada into Oregon. The Agencies are proposing to remove Corridor 7-24, but the corridor could connect to the north through Corridor 24-228. The BLM is in the beginning stages of potential geothermal project re-activation (Star Peak) and project development (North Valley and Baltazor) which would need tie-in connections to existing transmission lines. The potential minor revisions would minimize potential environmental impacts by better aligning with existing infrastructure, thus minimizing disturbed area on the landscape. The potential corridor extension would facilitate necessary connectivity parallel to the north-south highway for future energy infrastructure. For the orderly administration of public lands, the corridor should be placed parallel to the highway even though it overlaps GIS polygons for two WSAs. The review recognizes congressional designation of the WSAs, but also a contiguous pathway for the existing highway transportation and potentially for energy transmission. If the WSAs were to be designated as Wilderness Areas, they would best be designated with boundaries that exclude the highway and facilitate these energy and transportation needs.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- The Silver State Sand Dunes is one of the largest active sand dune complexes in the western United States. It supports rare plants and insects and is categorized by The Nature Conservancy as a Great Basin Portfolio Site. Development along BLM land near the sand dunes could be difficult because of stability issues, disruption of wind and sand dispersal patterns, and potential impacts on species from infrastructure building.
- The corridor crosses and runs parallel to the California NHT between MP 18 and MP 25 and crosses the NHT again at MP 34. Changing the route to follow existing transmission line between MP 25 and MP 42 would result in a larger distance of corridor running parallel to the NHT, and thus is not recommended.
- Wildlife impacts (Pronghorn Antelope).
- Visual impacts on the Black Rock Desert/High Rock Canyon NCA.
- GRSG habitat along northern portion of the corridor.
- The High Croft Mine is located near MP 42 on private land. Agencies should engage with local government and landowners early in the process during future land use planning or for a proposed project where the corridor crosses checkerboard jurisdiction.

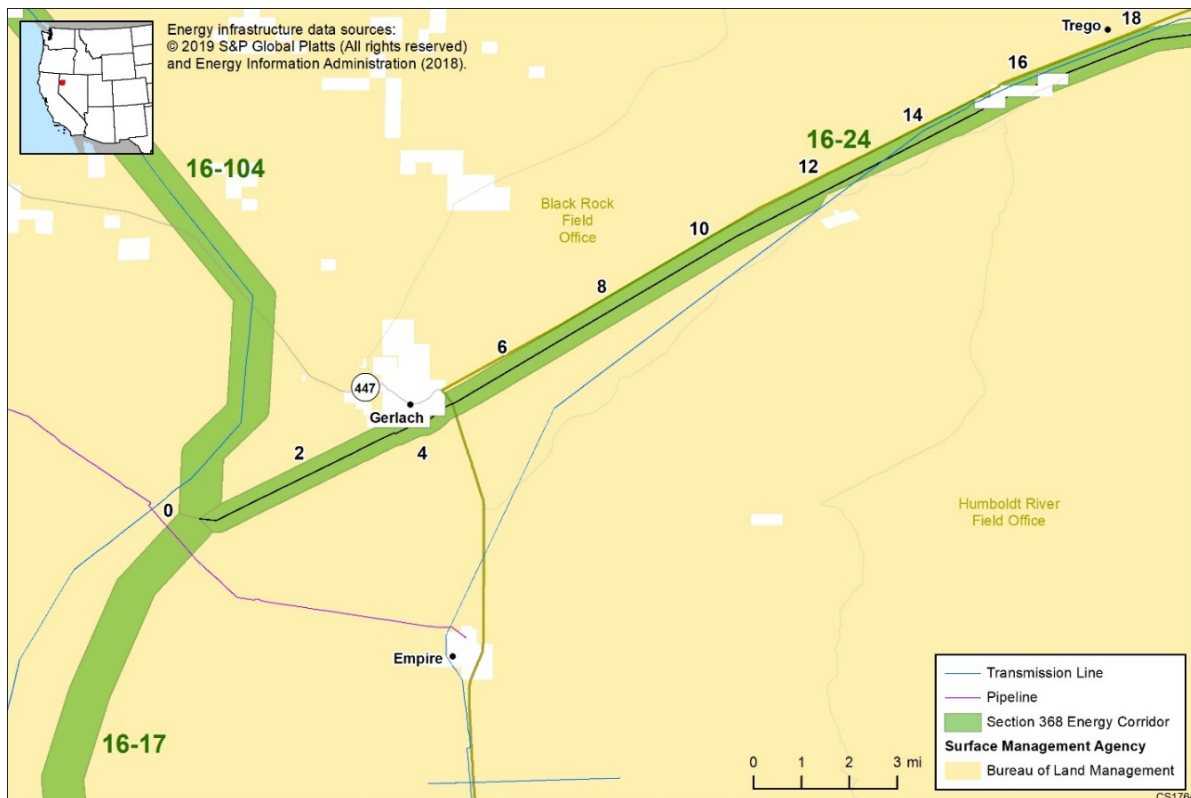


Figure 3.5-15b. Corridor 16-24, as designated (MP 0 to MP 12)

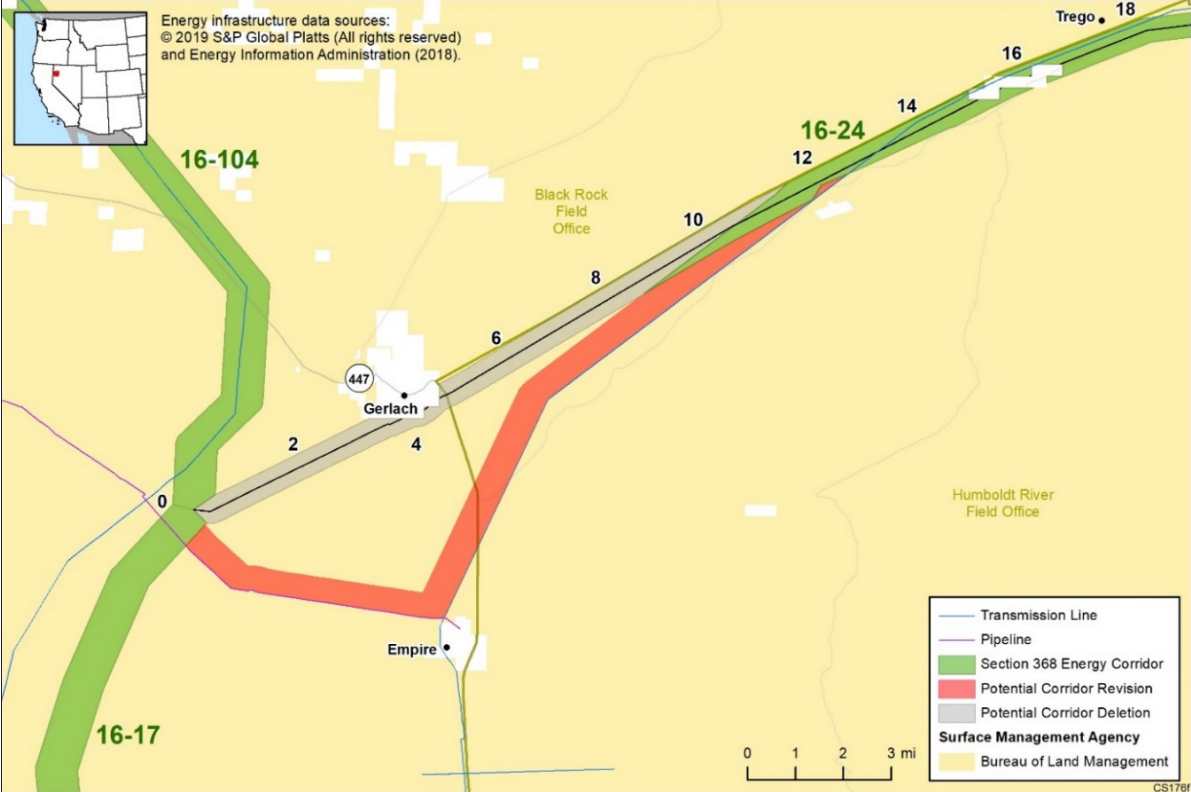


Figure 3.5-15c. Potential Revision to Corridor 16-24 (MP 0 to MP 12)

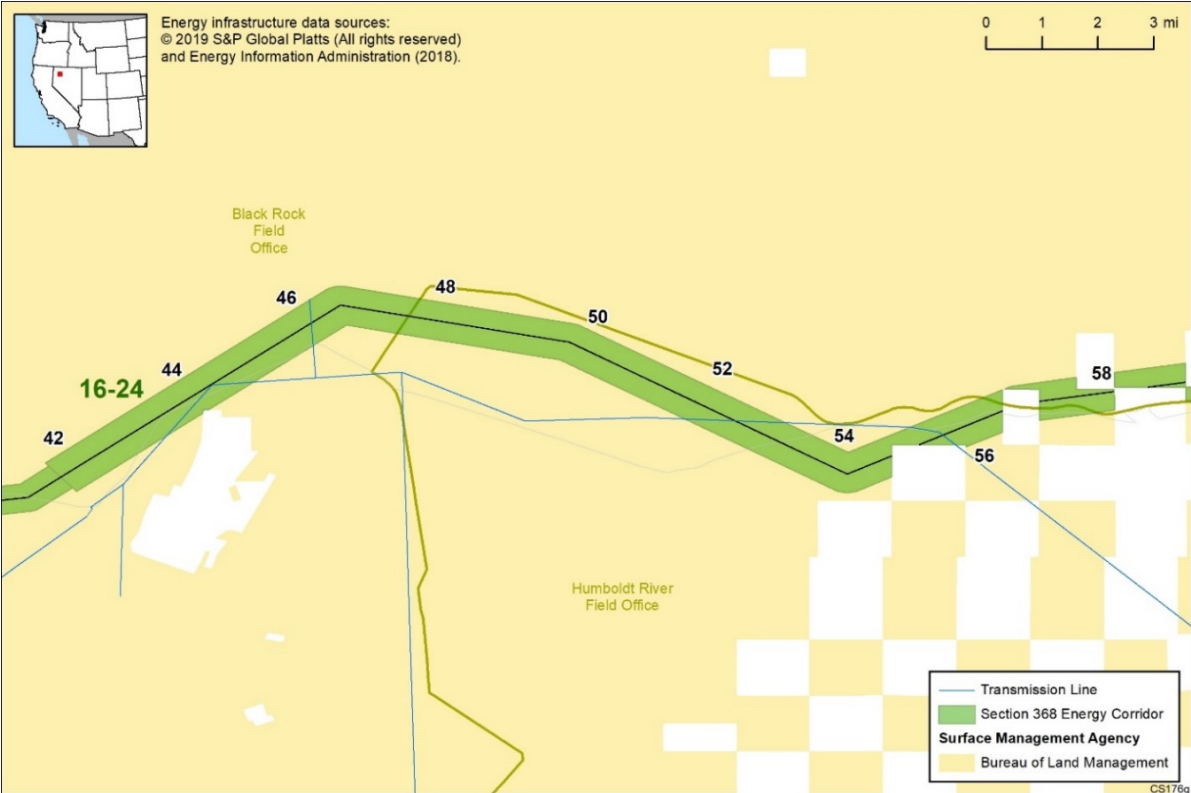


Figure 3.5-15d. Corridor 16-24, as designated (MP 44 to MP 56)

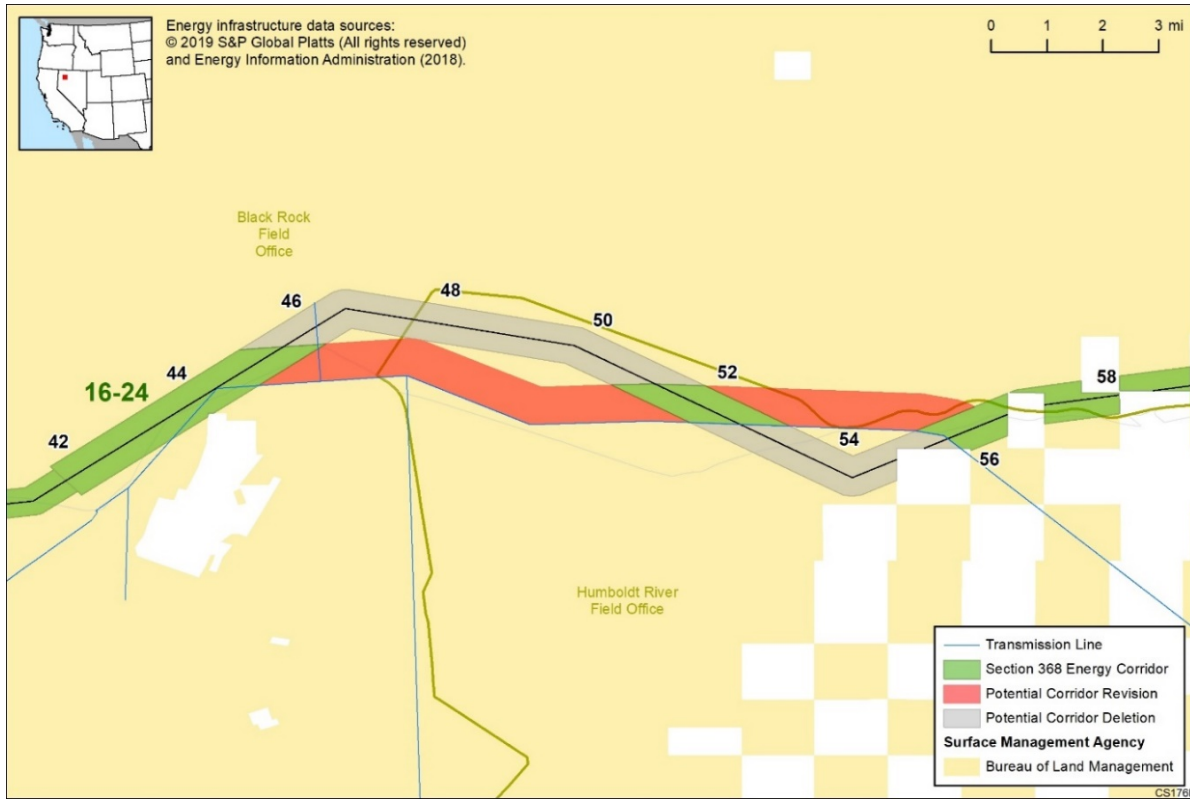


Figure 3.5-15e. Potential Revision to Corridor 16-24 (MP 44 to MP 56)

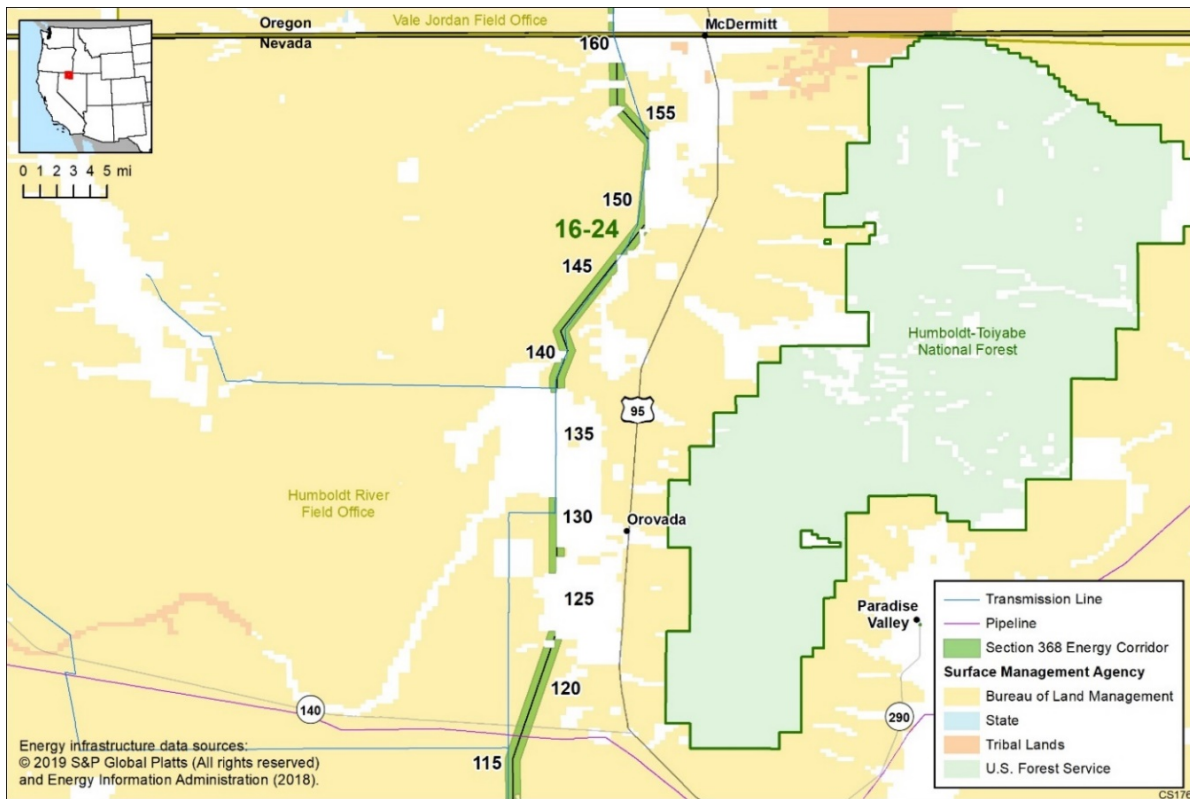


Figure 3.5-15f. Corridor 16-24, as designated (MP 115 to MP 160)

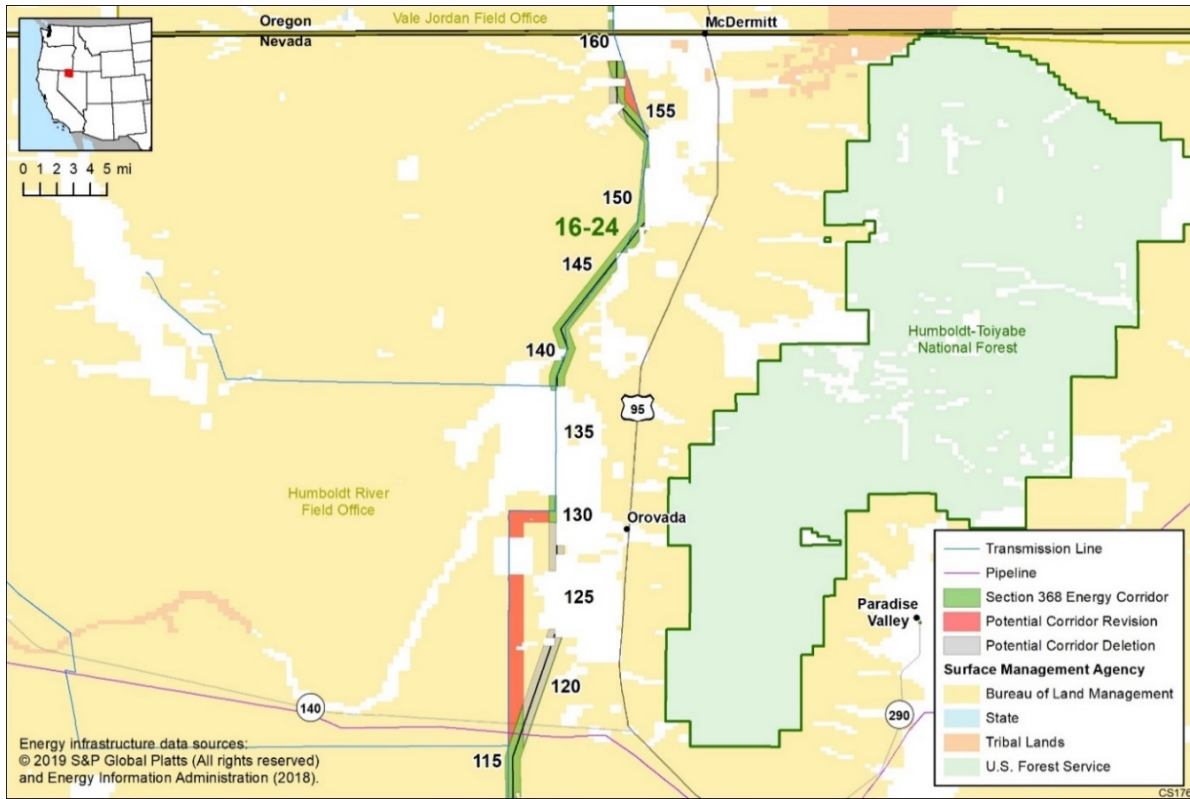


Figure 3.5-15g. Potential Revision to Corridor 16-24 (MP 115 to MP 160)

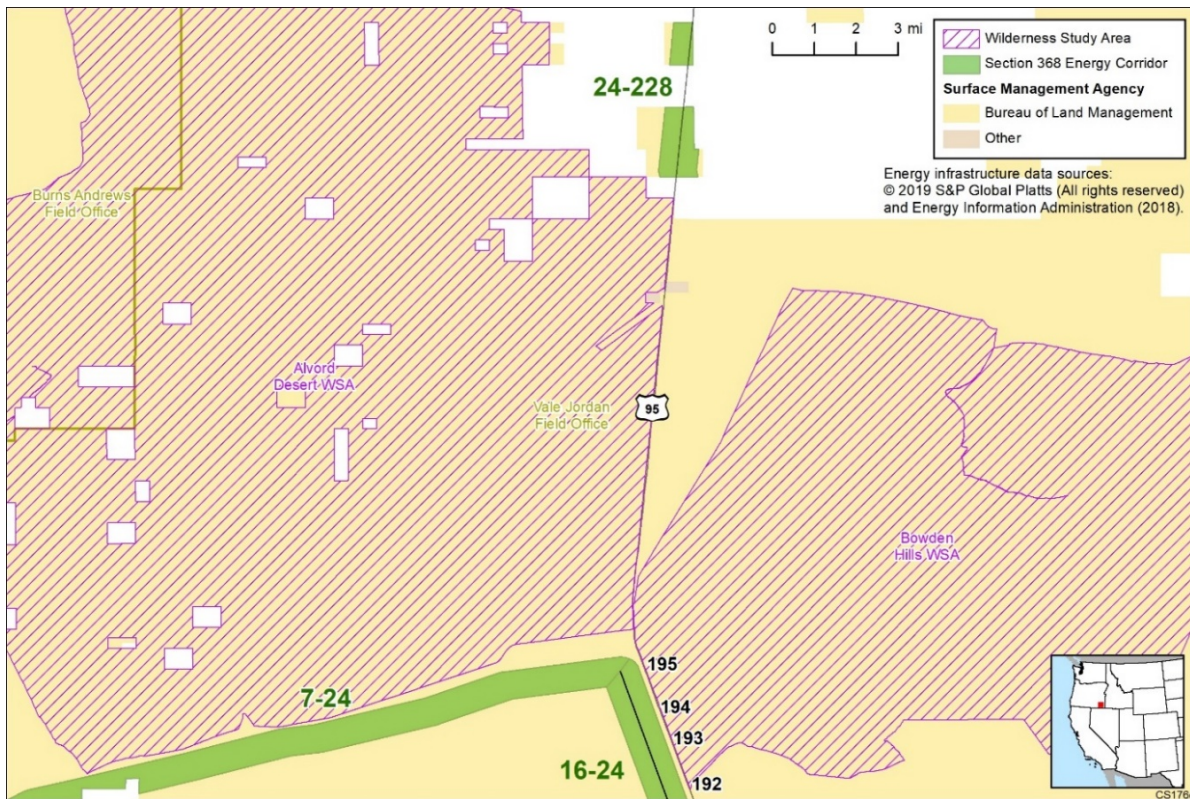


Figure 3.5-15h. Corridor 16-24, as designated (MP 195)

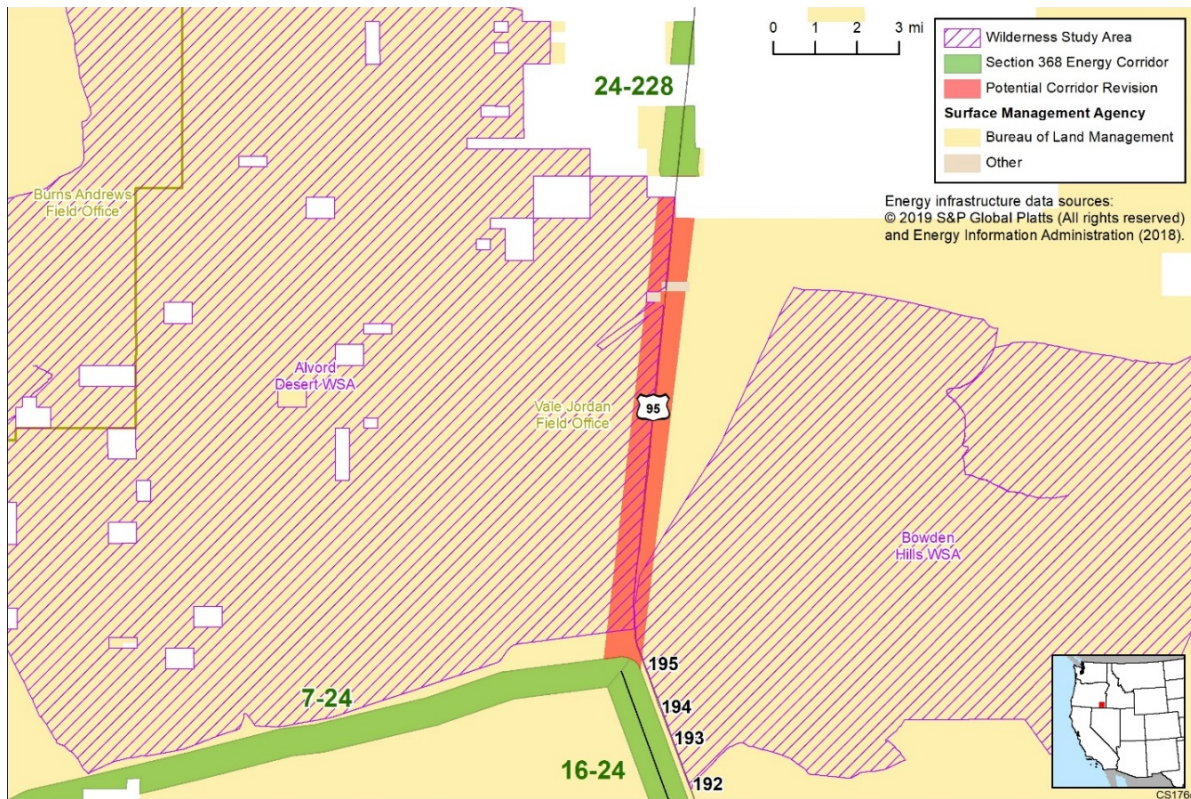


Figure 3.5-15i. Potential Revision to Corridor 16-24 (MP 195)

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 16-24, specific issues that would be addressed through potential IOP revisions or additions include:

- The California NHT and the Four Trails Feasibility Study Trail intersect the corridor. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- Lands with undetermined status for wilderness characteristics intersect and are adjacent to the corridor. Agencies could consider a new IOP to assist with avoiding and/or minimizing impacts on developing energy infrastructure on lands with wilderness characteristics.
- Wildlife species connectivity has been identified within the corridor. The Agencies could consider an IOP that minimizes impacts on habitat connectivity.
- MTRs (Low-speed Route, VR, and IR) and SUA intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 16-24 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 16-104 Empire to Madeline Corridor

Agency Jurisdictions

Bureau of Land Management

Applegate Field Office

Black Rock Field Office

California County

Lassen County

Nevada County

Washoe County

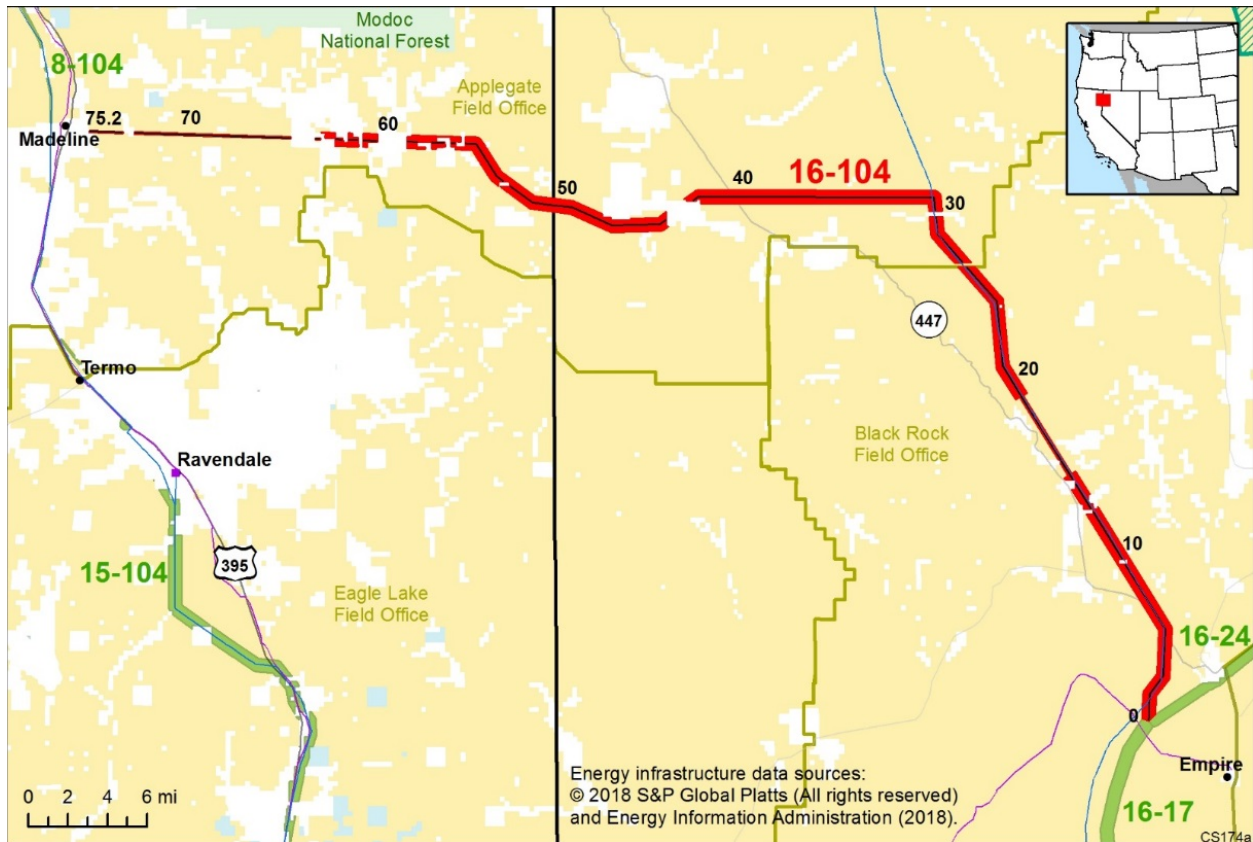


Figure 3.5-16a. Corridor 16-104 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Alturas RMP (2008)

ROD Surprise RMP (2008)

Winnemucca District Planning Area RMP (2015)

NVCA GRSG ARMPA (2019)

Corridor width: variable widths of 500 ft, 1,000 ft, and 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

Delete the corridor because the corridor does not meet the siting principles (Figure 3.5-16c). GRSG PHMA and GHMA (ROW avoidance areas) intersect the corridor where there is no existing infrastructure (MP 31 to MP 75) and there are other corridors in the area that can meet future energy needs. In addition, the corridor was identified in the Settlement Agreement as a corridor of concern for wilderness areas. The Poodle Mountain WSA is within 1.5 miles of the corridor west of MP 13 to MP 21. In this location, the corridor is narrowed to 500 ft, potentially limiting future development within the corridor.

The following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- The corridor follows 1000-kV DC line for half of its length; the rest of the corridor (MP 31 to MP 75) contains no existing infrastructure. GRSG lek sites and habitat are present throughout the corridor (MP 11 to MP 31 and MP 43 to MP 75 cross nearly continuous GRSG PHMA or GHMA). Both litigation and GRSG mitigation requirements would likely prevent future infrastructure within the corridor.
- There may not be a need for energy along this route.

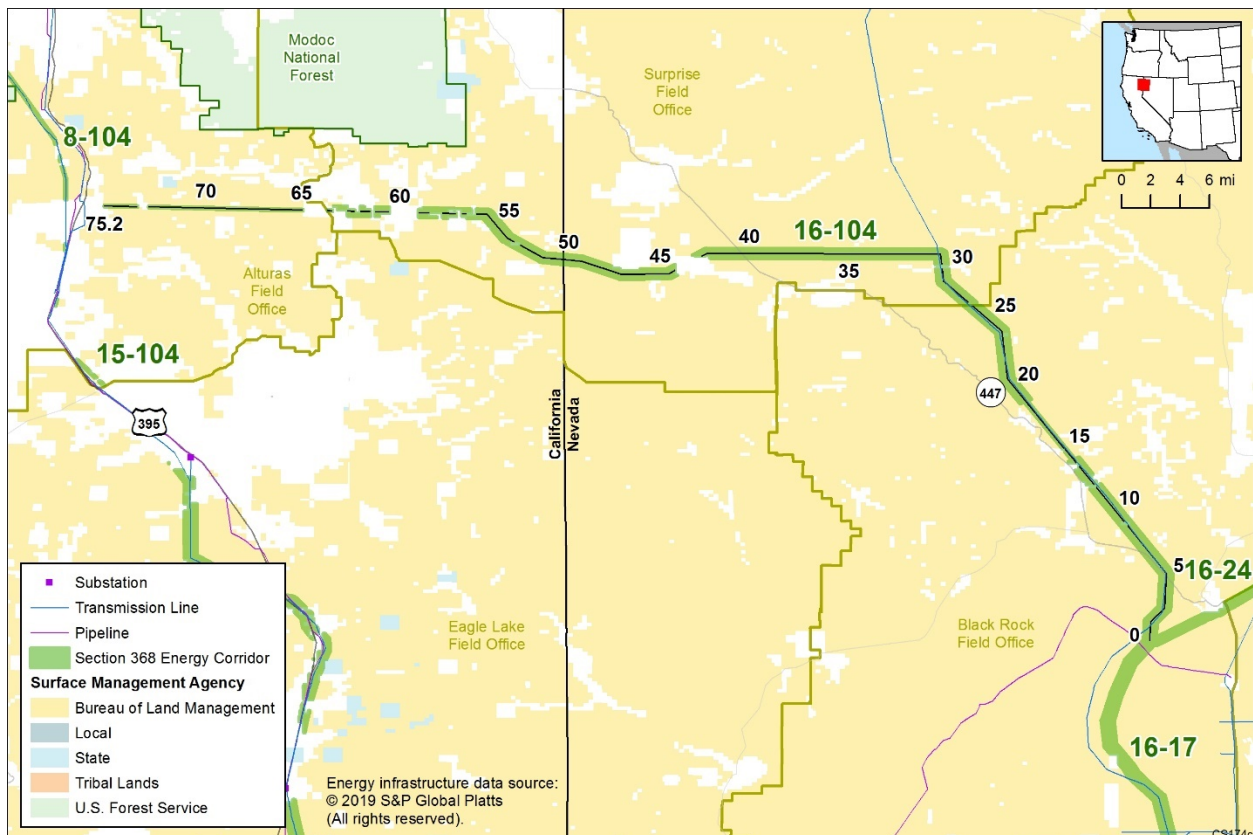


Figure 3.5-16b. Corridor 16-104, as designated

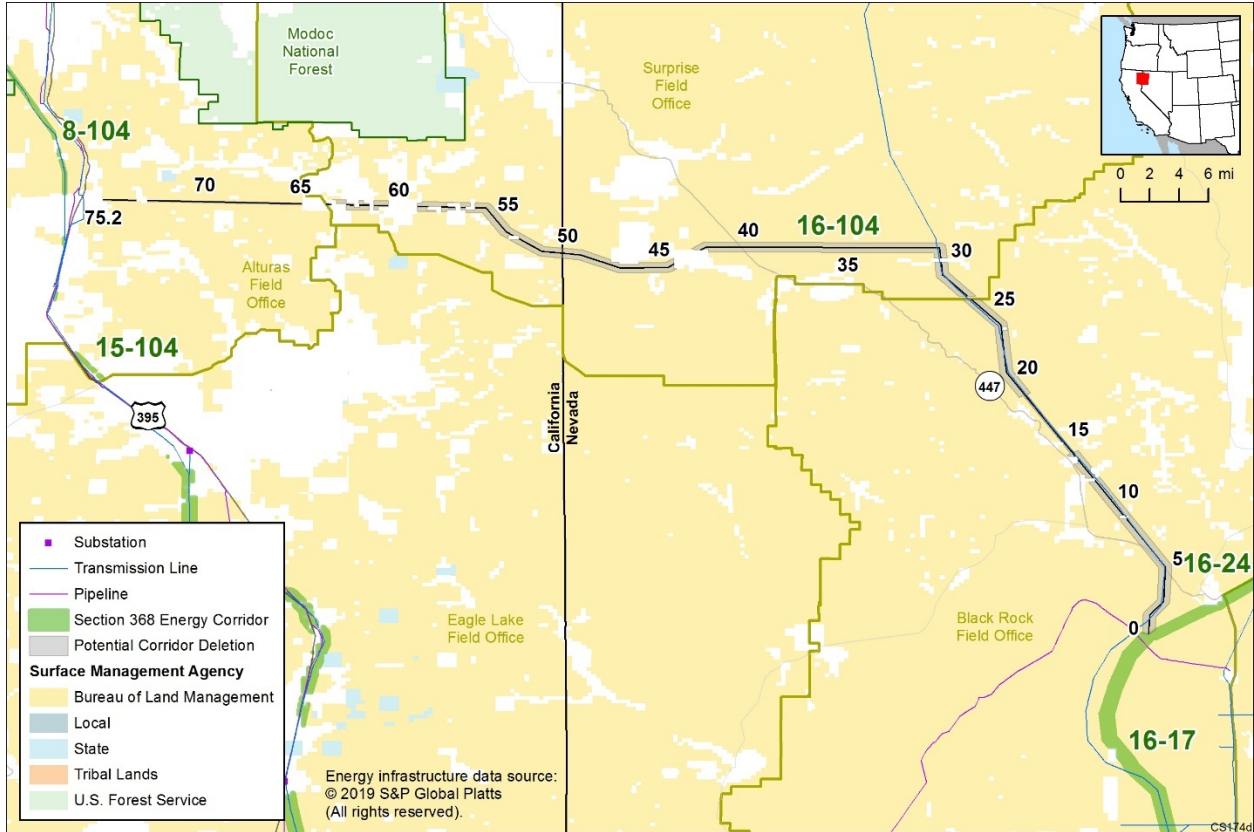


Figure 3.5-16c. Corridor 16-104 Potential Deletion

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 16-104 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 17-18 Pyramid to Yerington Corridor

Agency Jurisdictions

Bureau of Land Management

Humboldt River Field Office
Sierra Front Field Office
Stillwater Field Office

Nevada Counties

Churchill County
Lyon County
Washoe County

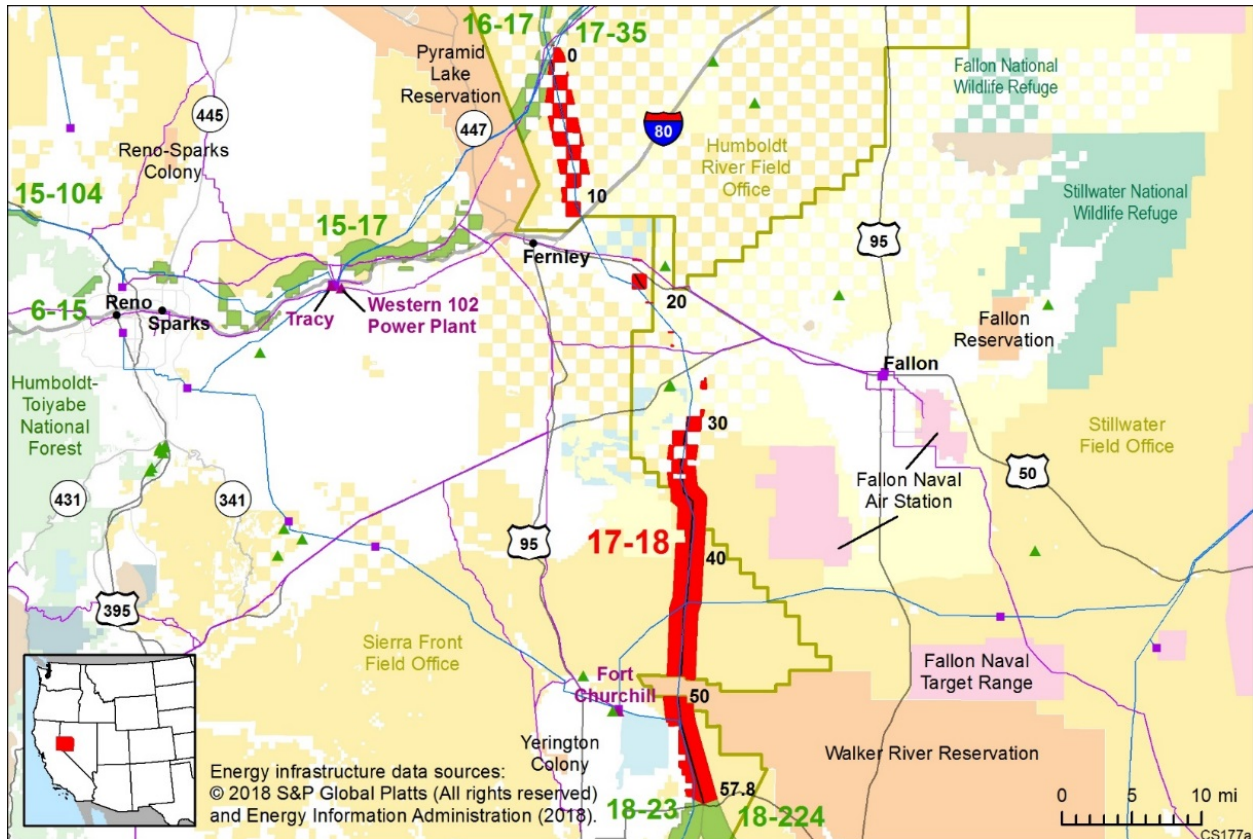


Figure 3.5-17. Corridor 17-18 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

- Carson City Consolidated RMP (2001)
- Winnemucca District Planning Area RMP (2015)
- NVCA GRSG ARMPA (2019)
- ROD and LUPA for the NVCA GRSG Bi-State DPS in the Carson City District and Tonopah Field Office (2016)

Corridor width: 10,560 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Modifications Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid jurisdictional concerns.

From MP 43 to MP 51, shift the corridor to the west along the existing 230-kV transmission line to avoid the Walker River Reservation.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 16-17 to the north and Corridors 18-23 and 18-224 to the south), creating a continuous corridor network across BLM-administered lands to the north into California and Oregon and to the south into Las Vegas, Nevada. There is an existing geothermal plant at Wabuska, which may see expansion in the future. The corridor is occupied by a LADWP transmission line, so future energy needs in southern California and Nevada could be served by this corridor. The potential minor revision would minimize impacts on the Walker River Reservation to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 1,000-kV transmission line).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 17-18, specific issues that would be addressed through potential IOP revisions or additions include:

- The Pony Express NHT and the Four Trails Feasibility Study Trail intersect the corridor. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- MTR-VR, Slow-speed Route, and SUA intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 17-18 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 17-35 Pyramid Lake to US 93 Corridor

Agency Jurisdictions

Bureau of Land Management
Humboldt Field Office

Nevada Counties

Churchill County
Humboldt County
Pershing County
Washoe County

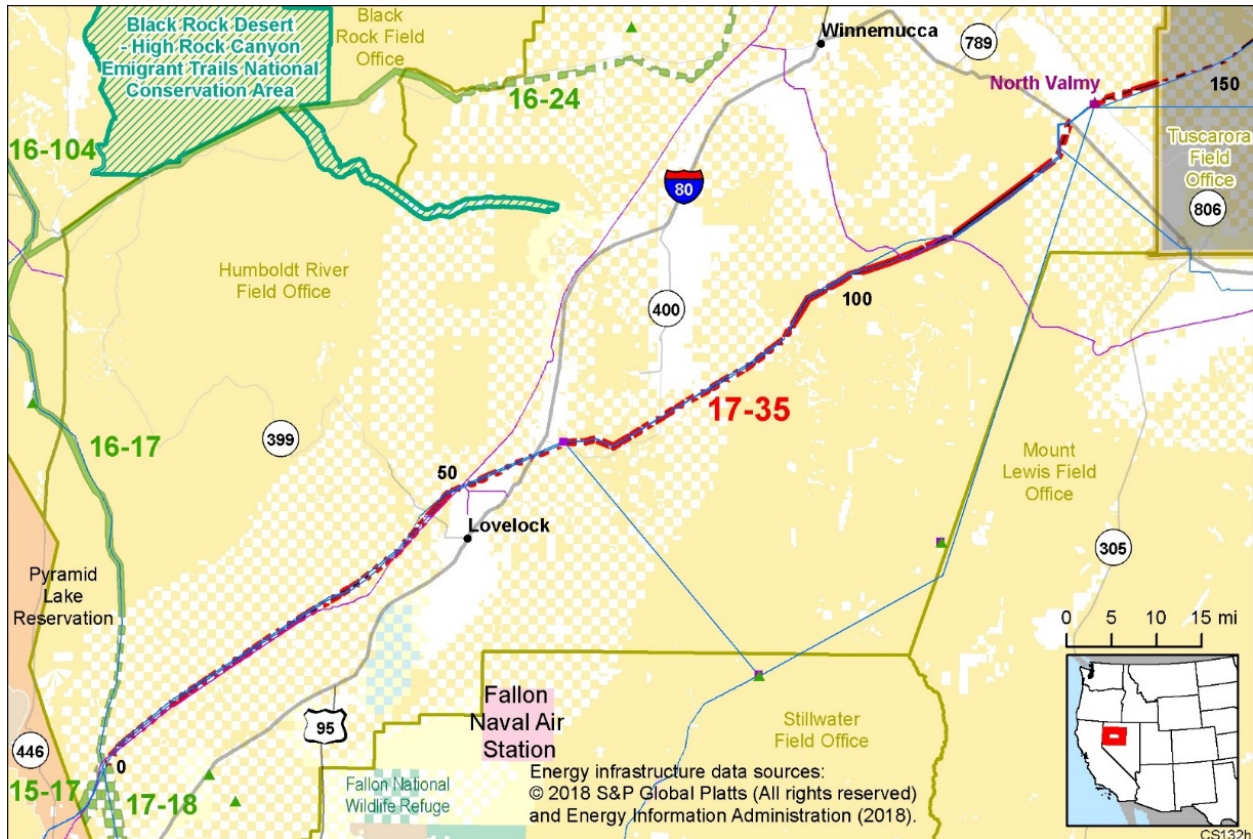


Figure 3.5-18a. Corridor 17-35 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Winnemucca District Planning Area RMP (2015)
NVCA GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Add a corridor braid at MP 136 west to collocate with the existing 230-kV transmission line until it joins with MP 195 in Region 3 to minimize impacts on PHMA in Region 3 (Figure 3.5-18c).
- Implement minor adjustments to avoid sensitive areas.

Consider potential adjustments to the corridor to avoid terrain concerns.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 16-17 to the west and Corridors 35-43 and 43-111 to the east), creating a pathway for electrical and pipeline transmission within northeastern Nevada. The corridor was identified as a corridor of concern in the Settlement Agreement for access to coal and impacts on GRSG habitat. The corridor crosses GHMA and PHMA, ROW avoidance areas that may not be compatible with the corridor’s purpose as a preferred location for infrastructure. However, the corridor is collocated with two existing transmission lines and the potential corridor braid provides a secondary route that minimizes impacts on PHMA in Region 3. The Region 3 portion of the corridor was evaluated in the Regions 2 and 3 regional review and is not included in this review.

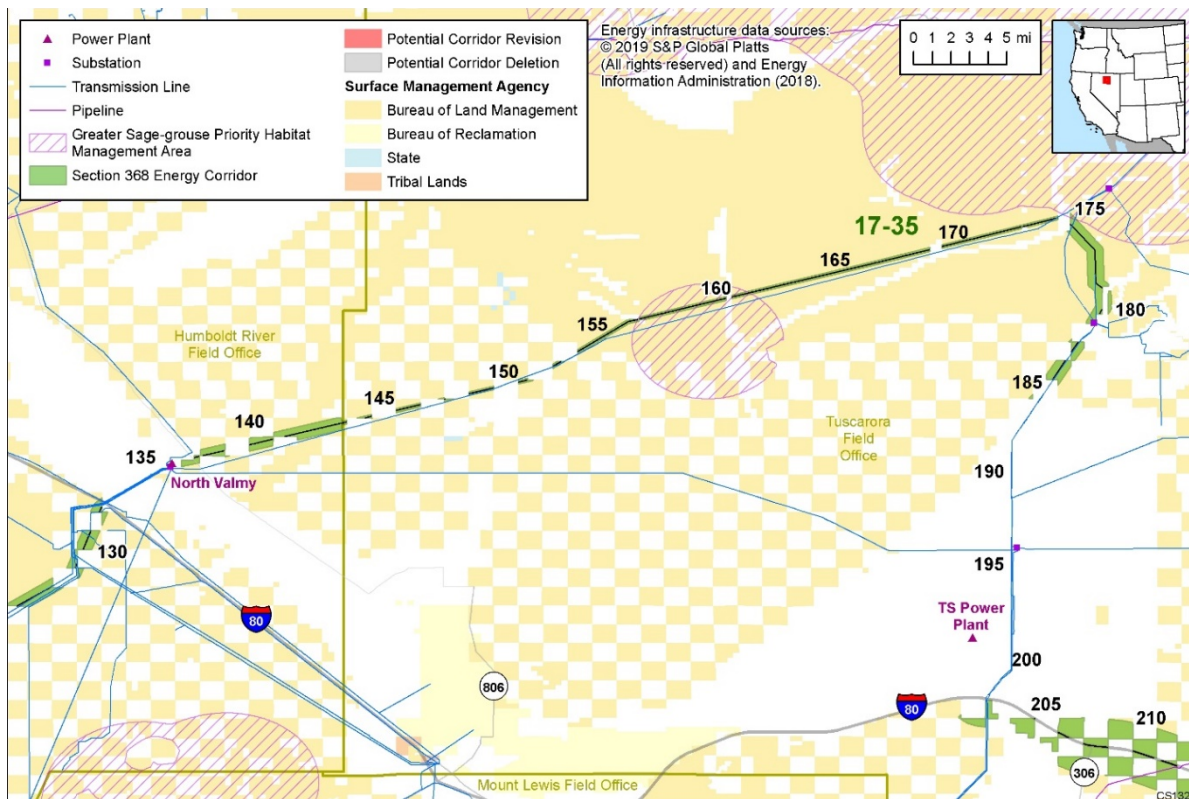


Figure 3.5-18b. Corridor 17-35, as designated

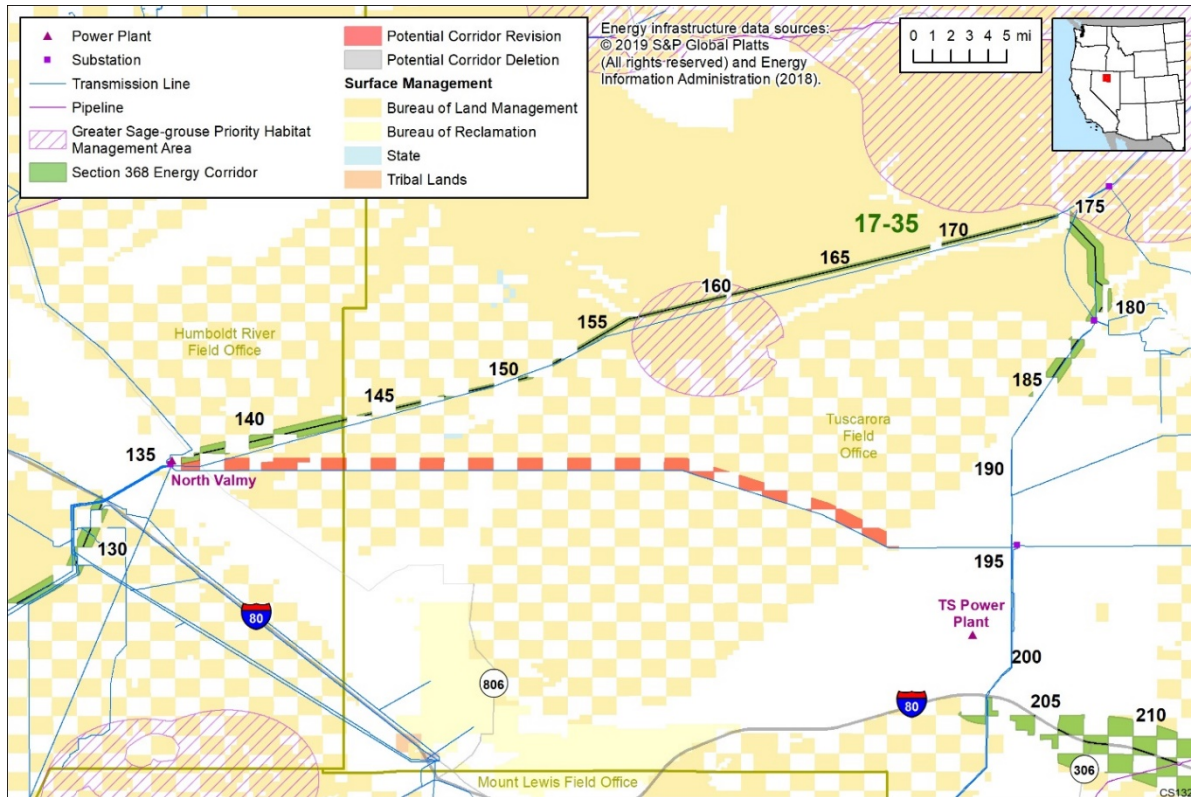


Figure 3.5-18c. Potential Revision to Corridor 17-35

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 17-35, specific issues that would be addressed through potential IOP revisions or additions include:

- The California NHT and the Four Trails Feasibility Study Trail intersect the corridor. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- MTR-VR, IR, and Slow-speed Route intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 17-35 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 18-23 Yerington to Ridgecrest Corridor

Agency Jurisdictions

Bureau of Land Management

Bishop Field Office
 Ridgecrest Field Office
 Sierra Front Field Office
 Stillwater Field Office

Forest Service

Humboldt-Toiyabe National Forest
 Inyo National Forest

California Counties

Inyo County
 Mono County

Nevada Counties

Lyon County
 Mineral County

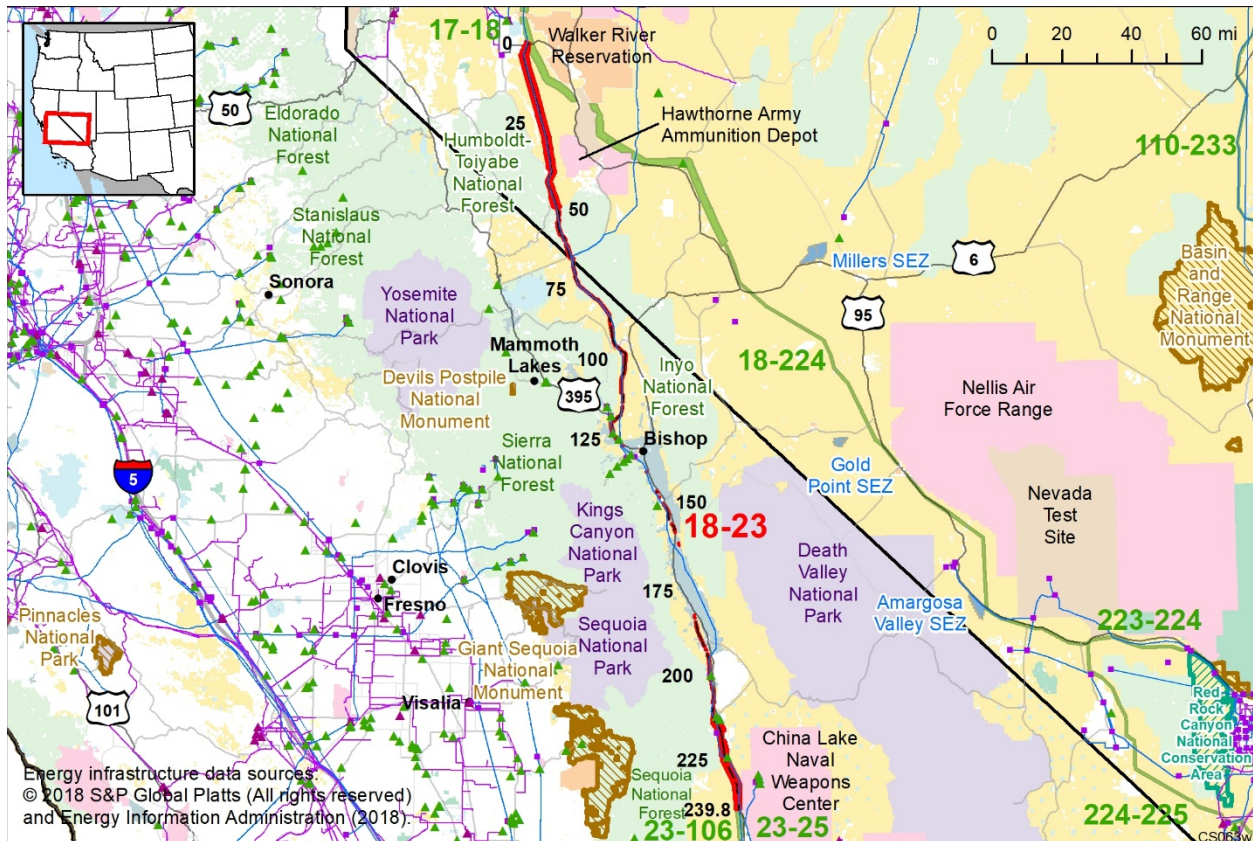


Figure 3.5-19a. Corridor 18-23 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Bishop RMP (1993)

CA Desert Conservation Plan (1999), as modified by the Northern & Eastern Mojave RMP (2002), and the DRECP (2016).

Carson City Field Office Consolidated RMP (2001).

Inyo National Forest LMP (1988)

Toiyabe National Forest LMP (1986)

NVCA GRSG ARMPA (2019)

ROD and LUPA for the NVCA GRSG Bi-State DPS in the Carson City District and Tonopah Field Office (2016)

Corridor width: 1,320 ft in Bishop Field Office (except variable widths from MP 110 to MP 116) and Inyo Field Office; 10,560 ft in Ridgecrest, Sierra, and Stillwater Field Offices; and variable widths in Humboldt-Toiyabe National Forest.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).

Shift the corridor where it deviates from the existing infrastructure to follow the 1,000-kV DC line (MP 86 to MP 216).

From MP 110 to MP 116, consider widening the corridor to 1,320 ft.

- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- From MP 38 to MP 212, limit future development to within existing ROW footprint.

The corridor is located in an area of high biological, recreational, visual and cultural value. The corridor crosses habitat for the Bi-state population of GRSG and the corridor is narrowed in places to avoid WSAs on either side of the corridor. Stakeholders suggested deleting the corridor or provided suggestions for potential revisions. However, most of the corridor follows an existing 1,000-kV DC transmission line that serves as a crucial north-south energy transmission pathway, bringing hydropower from Oregon into areas of high demand in Los Angeles, California. The potential corridor revision would re-align the corridor along the DC transmission line where it deviates from the existing line in order to preserve the energy pathway and to minimize impacts by collocating corridors with existing infrastructure. The potential revision along the DC transmission line would also avoid the Alabama Hills NSA which was designated in the John D. Dingell, Jr. Conservation, Management, and Recreation Act (March 12, 2019) (Figure 3.5-19f, g). Restricting development to the existing ROW footprint in an environmentally sensitive area would limit future impacts while maintaining corridor utility. Widening the corridor between MP 110 and MP 116 may be necessary to meet reliability standards should the 115-kV transmission line be upgraded into a 230-kV in the future. A 230-kV transmission line could increase the capacity and provide maximum flexibility for renewable energy transmission. For the orderly administration of public lands, the corridor should be placed centered on the DC transmission line even where it overlaps GIS polygons for a WSA. The review recognizes congressional designation of the WSAs, but also a potentially contiguous pathway for future upgraded energy transmission. If the WSA were to be designated as a Wilderness Area, it would best be designated with the boundaries that facilitate these energy transmission and surface transportation needs.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Bi-state population of GRS (MP 33 to MP 103). The best (but fragmented) habitat near Bodie Hills/Mono Lake is located very near the corridor. Other concerns related to GRS include:
 - lek locations
 - impact of height of transmission lines on perching by GRS predators (need BMPs for height, anti-perching)
 - potentially restrict development to underground only
 - limited private property in Mono County; if the GRS is listed as an ESA species, future development on private land in the county would be even more limited
 - Additional lines would harm GRS population
 - State of Nevada will require mitigation for bi-state population
- Concerns about wildlife (Bighorn Sheep).
- Concerns about lands with wilderness characteristics.
- Cultural resources/petroglyphs and tribal concerns.
- Concerns about proximity to Alabama Hills NSA-recreation and visual impacts.
- Concern about proximity to roadless areas.
- The east side of Owens Lake contains tortoise and Mohave ground squirrel habitat.
- Consider corridor location in relation to renewable energy low conflict zones.
- Consider other existing infrastructure in the area for energy corridors.
- Renewable energy in Nevada is critical to serve California demand, but there is no good transmission connection between north of Las Vegas to California.
- There are existing substations in the Bishop area – need to get transmission to and from Bishop.
- Economic impacts need to be considered.

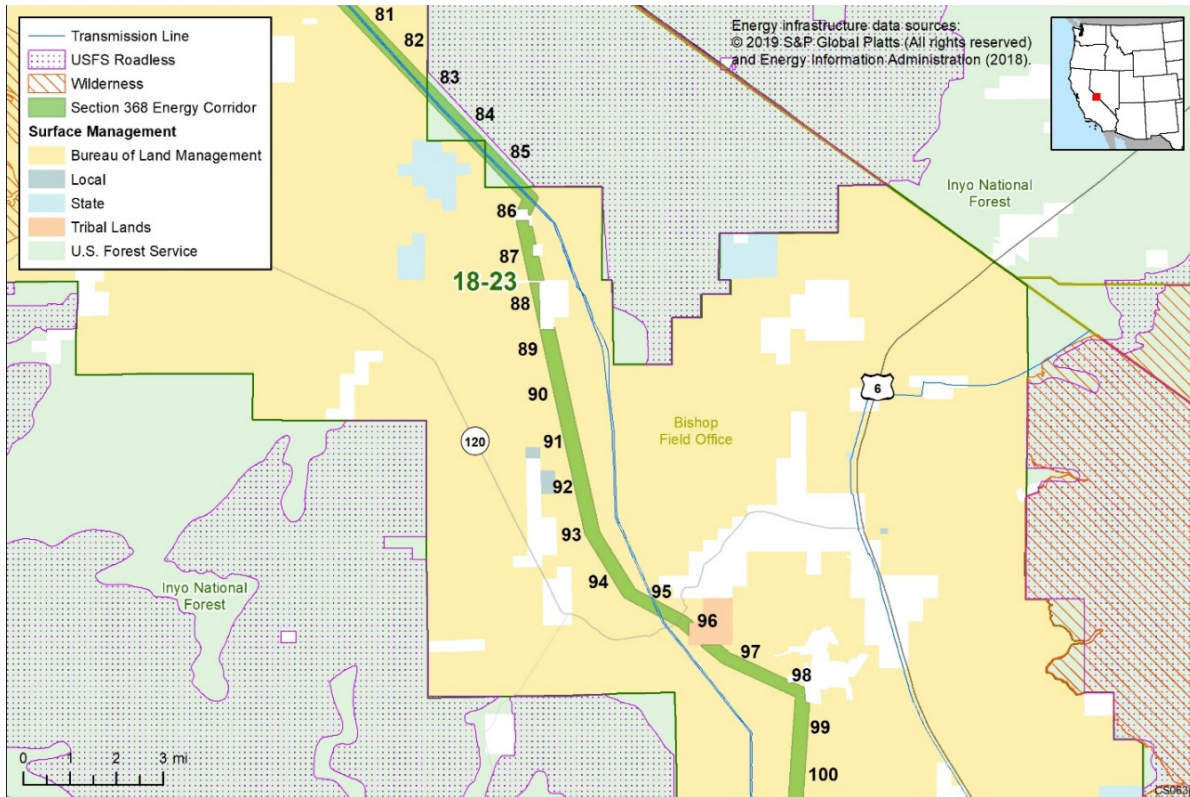


Figure 3.5-19b. Corridor 18-23 (MP 86 to MP 100), as designated

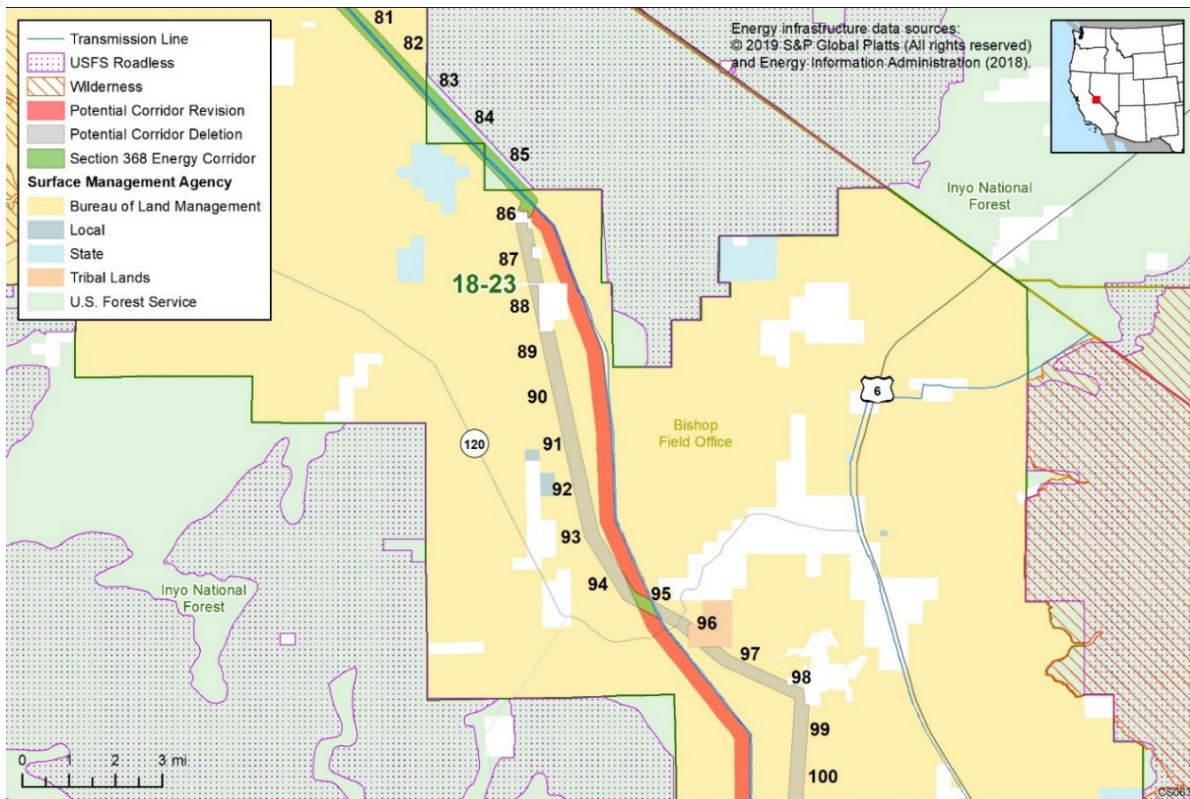


Figure 3.5-19c. Potential Revision to Corridor 18-23 (MP 86 to MP 100)

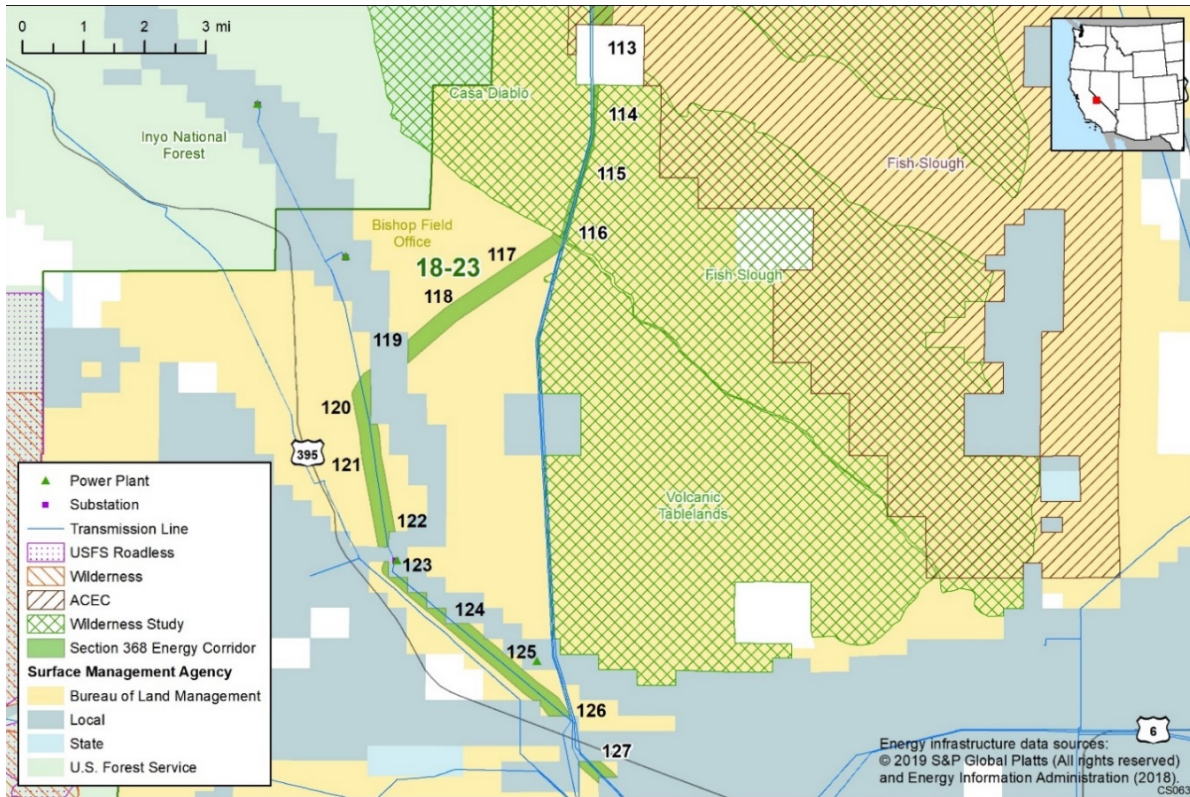


Figure 3.5-19d. Corridor 18-23 (MP 113 to MP 127), as designated

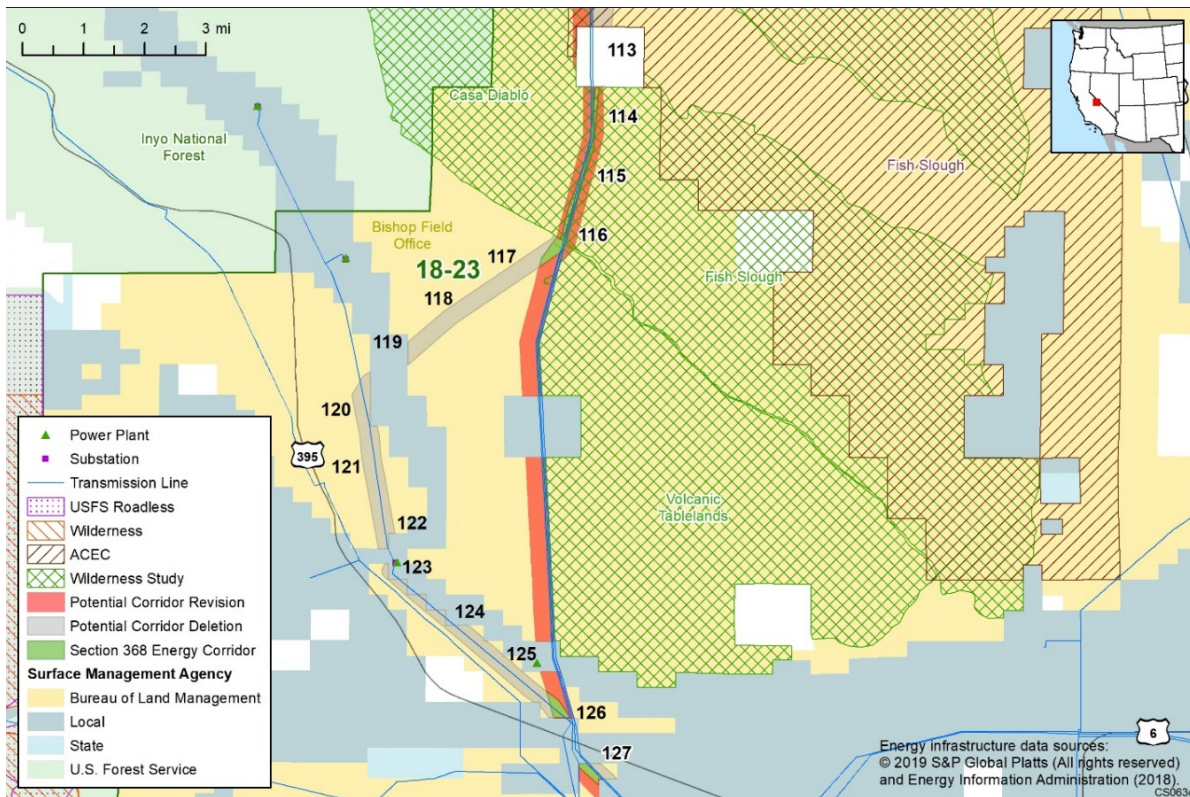


Figure 3.5-19e. Potential Revision to Corridor 18-23 (MP 113 to MP 127)

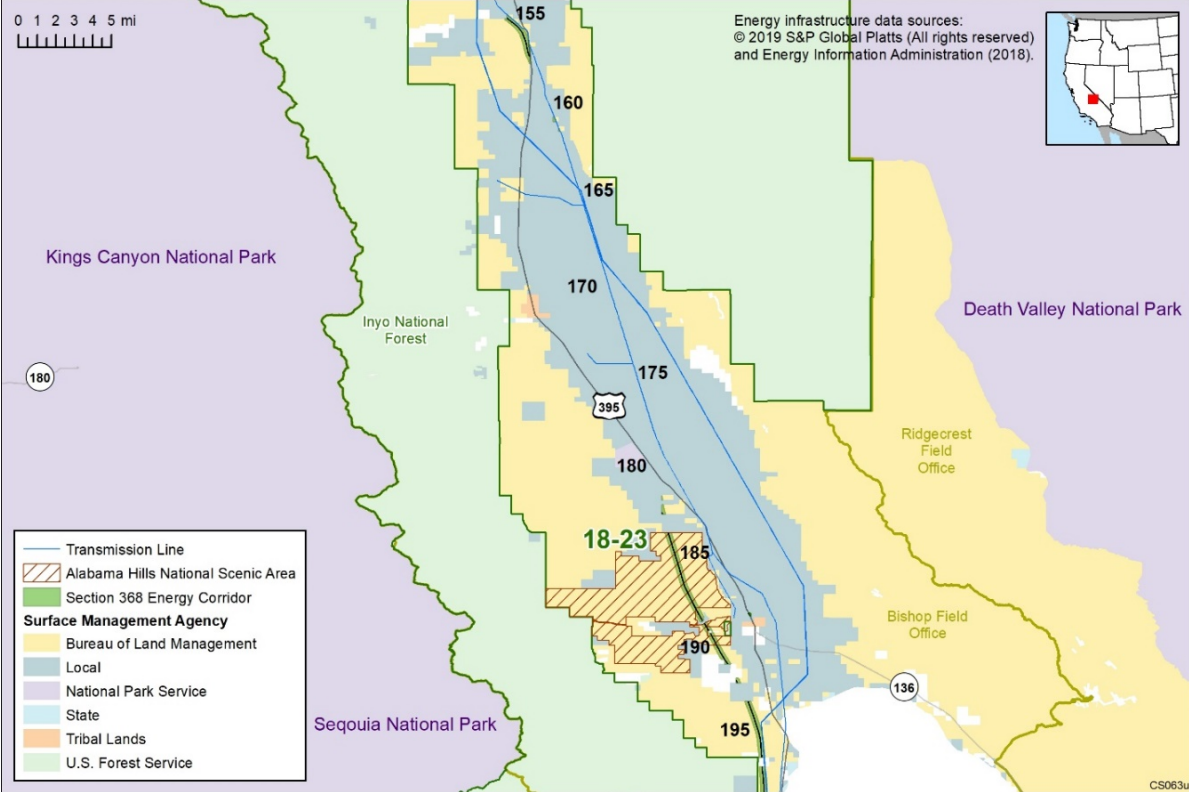


Figure 3.5-19f. Corridor 18-23 (MP 155 to MP 195), as designated

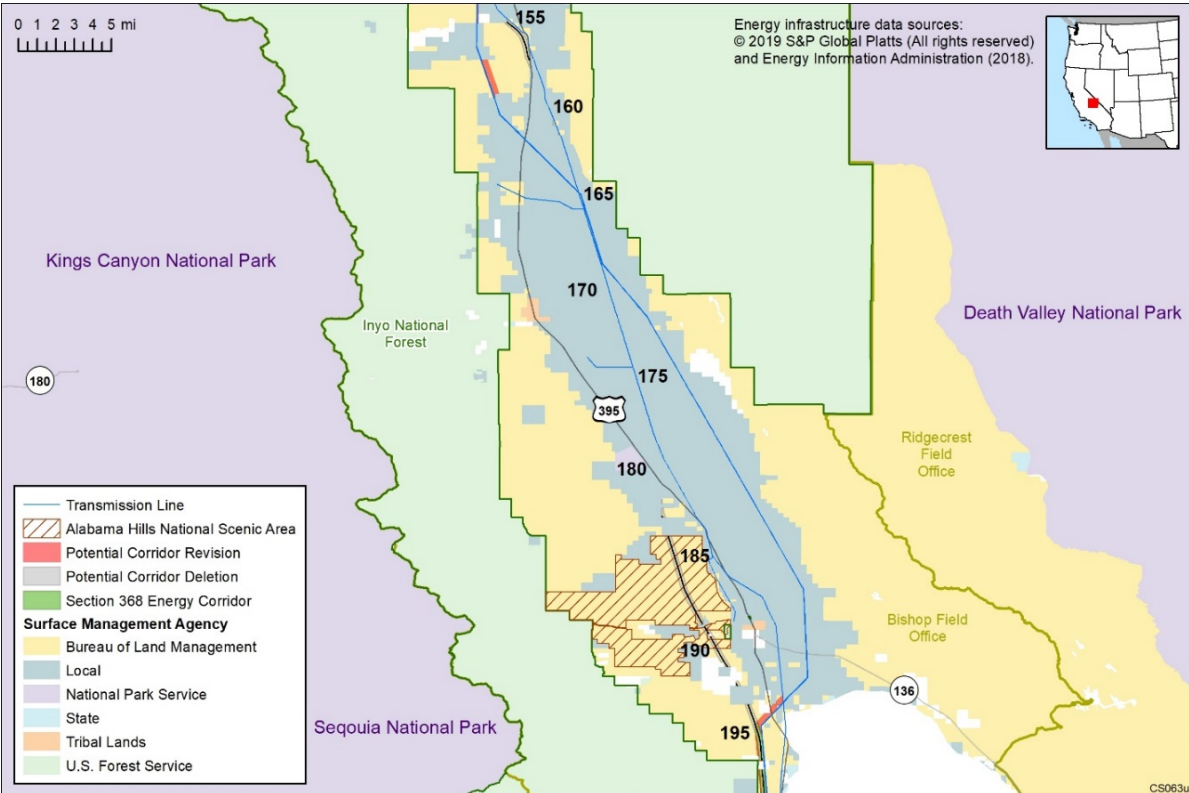


Figure 3.5-19g. Potential Revision to Corridor 18-23 (MP 155 to MP 195)

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 18-23, specific issues that would be addressed through potential IOP revisions or additions include:

- The Four Trails Feasibility Study Trail and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- The corridor is adjacent to the Mt. Hicks, Larking Lake, Long Valley, Excelsior, Deep Wells, and South Sierra Roadless Areas. Agencies could consider a coordination IOP related to Roadless Areas to help minimize conflicts with the Roadless Rule.
- Desert Tortoise and other wildlife species connectivity areas and habitat have been identified within the corridor. Agencies could consider an IOP that minimizes impacts on habitat connectivity.
- Agencies could consider an IOP to provide guidance on the review process for applications within corridors with incomplete inventories. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.
- MTR-IR and Slow-speed Route intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 18-23 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 18-224 Carson City to Las Vegas Corridor

Agency Jurisdictions

Bureau of Land Management

Pahrump Field Office
 Sierra Front Field Office
 Stillwater Field Office
 Tonopah Field Office

Nevada Counties

Esmeralda County
 Lyon County
 Mineral County
 Nye County

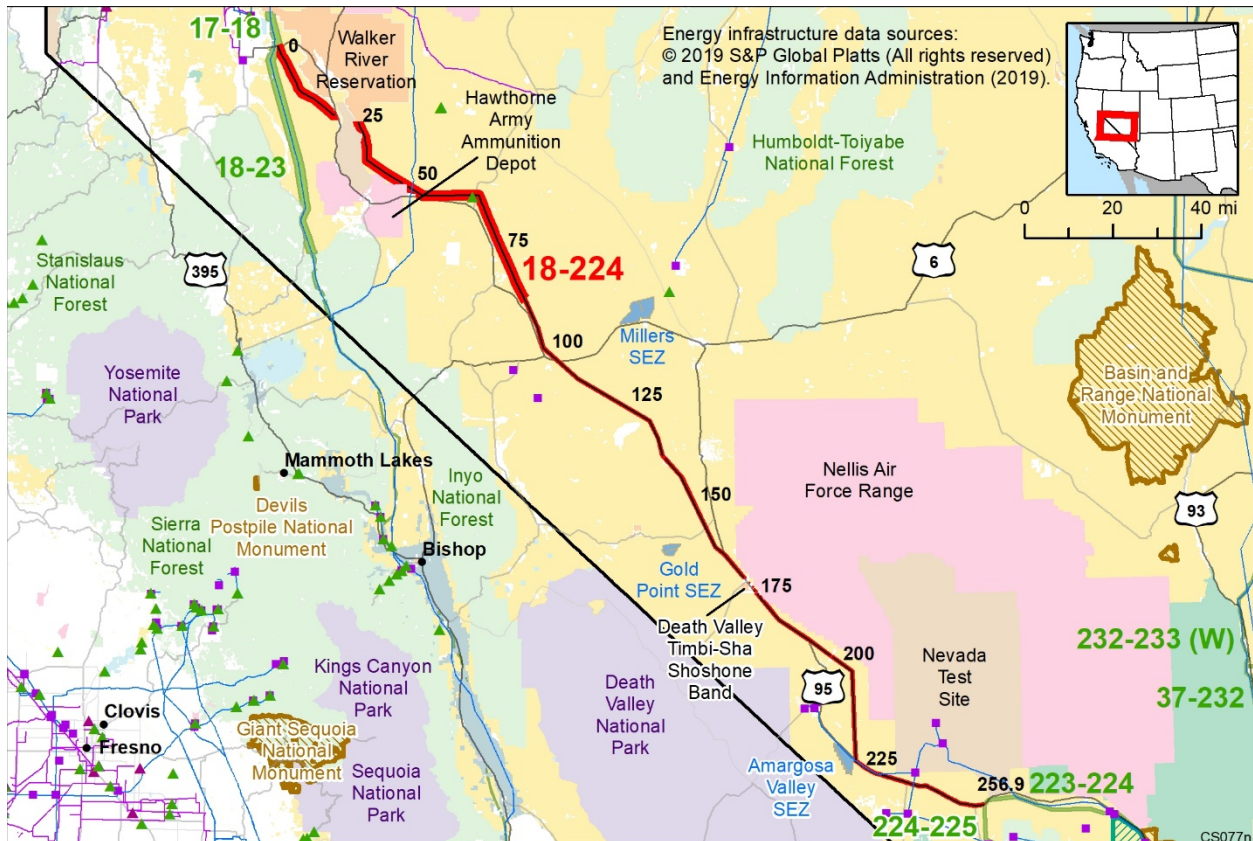


Figure 3.5-20a. Corridor 18-224 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Carson City Field Office Consolidated RMP (2001)
 Las Vegas RMP (1998)
 Tonopah RMP (1997)
 NVCA GRSG ARMPA (BLM 2019)

Corridor width: 3,500 ft in Tonopah and Pahrump Field Offices, remainder 10,560 ft.
 Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas and jurisdictional concerns.
 - Consider shifts in the corridor or a change in the VRM class where it crosses VRM Class II areas.
 - From MP 46 to MP 48, shift the corridor northeast so that existing infrastructure would be the southern boundary instead of the centerline to eliminate a pinch point along the Hawthorne Army Ammunition Depot.
 - During land use planning, the Agencies should engage with local government to determine if corridor should be shifted to avoid Amargosa Valley, Nevada (MP 237 to MP 239).
 - Consider potential adjustments to the corridor to avoid terrain and soil concerns.
- From MP 163 to MP 225, shift the corridor about 1 to 5 mi west and join the existing transmission line south of Beatty into Region 1 to avoid Nevada Test and Training Range expansion.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 17-28 to the north and Corridors 223-224 and 224-225 to the south), creating an interstate pathway for electrical and pipeline transmission from Carson City to the Nevada Test and Training Range as well as to Las Vegas, Nevada. The potential revisions would avoid a pinch point along the Hawthorne Army Ammunition Depot, the Nevada Test and Training Range expansion, tribal lands, and the town of Beatty. The revision would also avoid Desert Tortoise connectivity habitat if carefully sited. The potential revision should maintain adequate distance from Death Valley National Park and follow a route that minimizes terrain issues.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- The Agencies should engage with tribes to address the corridor gap across tribal lands (Walker River Reservation and Timbi-Sha Shoshone Reservation).
- Highway 11 and the potential for collocation with utilities and highways.
- Potential encroachment issues where the Nevada Test and Training Range is expanding to the highway.
- There are two SEZs in the area (Millers SEZ is about 19 miles east of MP 95 and Gold Point SEZ is about 7 miles west of MP 162), as well as geothermal energy potential, but there is a lack of transmission to get renewable energy to load centers.
- Environmental concerns include potential impacts on GRSG, Desert Tortoise, Amargosa Toad, and Oasis Valley Speckled Dace.

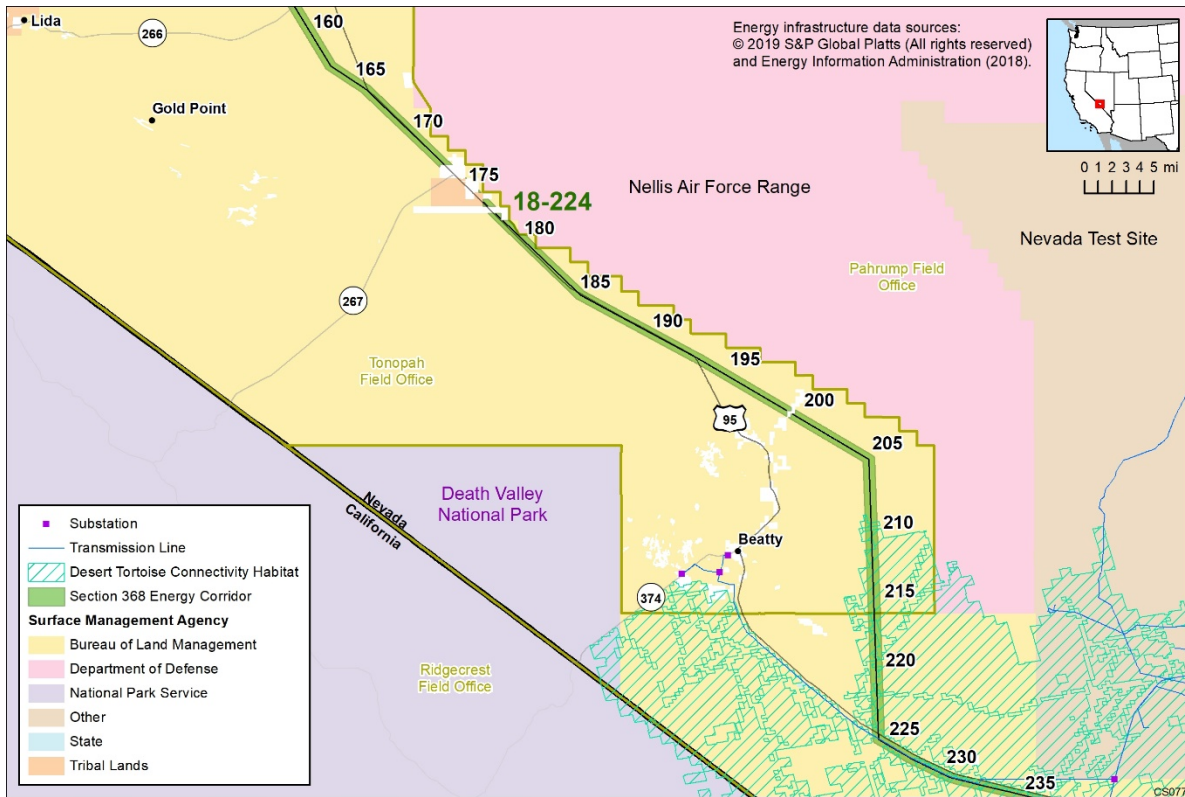


Figure 3.5-20b. Corridor 18-224, as designated

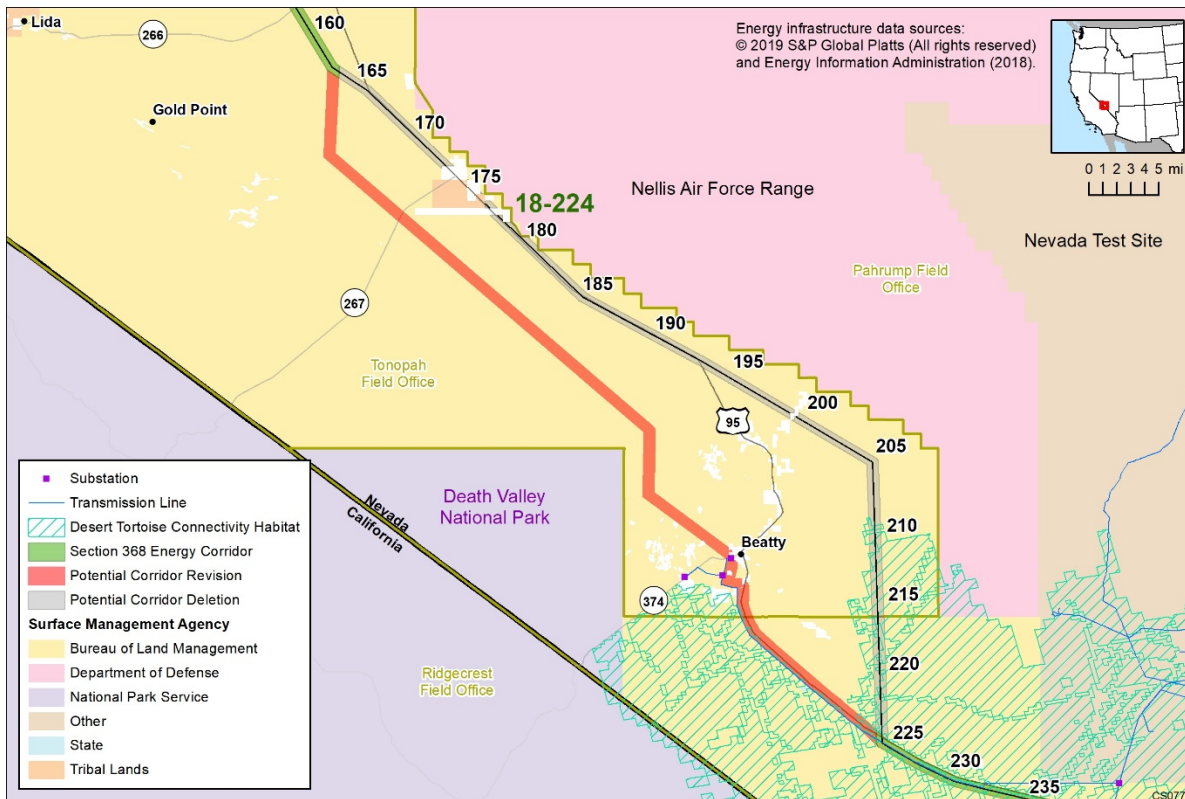


Figure 3.5-20c. Potential Revision to Corridor 18-224

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 18-224, specific issues that would be addressed through potential IOP revisions or additions include:

- Agencies could consider an IOP to provide guidance on the review process for applications within corridors with incomplete inventories such as lands with wilderness characteristics. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.
- Desert Tortoise connectivity areas and habitat have been identified near the corridor. Agencies could consider an IOP that minimizes impacts on habitat connectivity.
- MTR-IR, VR, and Slow-speed Route and SUA intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 18-224 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 24-228 Ion Highway to Boise Corridor

Agency Jurisdictions

Bureau of Land Management

Jordan Field Office
 Malheur Field Office
 Owyhee Field Office

Idaho County

Owyhee County

Oregon County

Malheur County

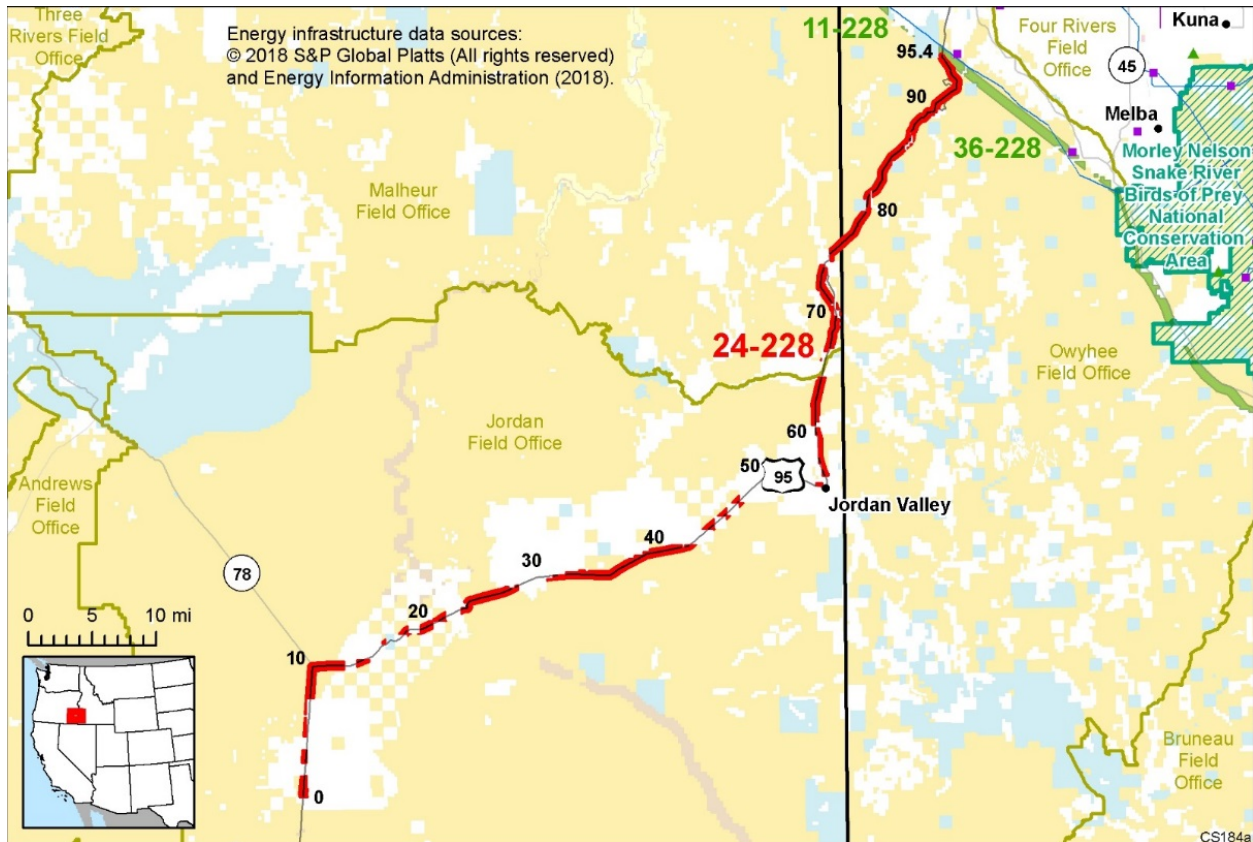


Figure 3.5-21. Corridor 24-228 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Owyhee RMP (1999)
 Southeastern Oregon RMP (2002)
 IDMT GRSG RMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.
 - From MP 7 to MP 76, small shifts could be made to avoid lands with wilderness characteristics while maintaining route along Highway 95.
 - From MP 82 to MP 85, shift the corridor to the edge of the highway or the transmission line to avoid the Blackstock SRMA while maintaining the corridor width on federal lands.
 - From MP 90 to MP 95, shift the corridor west of the Squaw Creek RNA ACEC to avoid both the ACEC and the Squaw Creek Addition SRMA and the Owyhee Front SRMA while maintaining the corridor width on federal lands.
- Extend Corridor 16-24 from its northern end (MP 195) to connect with Corridor 24-228. This potential corridor extension would overlap the Boden Hills WSA and the Alvord Desert WSA; however, this pathway is along a major shipping route on Highway 95 and an airport runway is located adjacent to the WSA as well.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a pathway for energy transport from Oregon to Boise, Idaho, following Highway 95. The corridor crosses GHMA and PHMA, ROW avoidance areas that may not be compatible with the corridor's purpose as a preferred location for infrastructure. However, the corridor is collocated with I-95. The potential minor revisions would minimize impacts on SRMAs and the Squaw Creek RNA ACEC to the greatest extent possible while reducing overlap with specially designated areas. Although the potential corridor extension is a potential revision for Corridor 16-24, it is discussed here since it connects to Corridor 24-228 and would facilitate necessary connectivity parallel to the north-south highway for future energy infrastructure. For the orderly administration of public lands, the corridor should be placed parallel to the highway even though it overlaps GIS polygons for two WSAs. The review recognizes congressional designation of the WSAs, but also a contiguous pathway for the existing highway transportation and potentially for energy transmission. If the WSAs were to be designated as Wilderness Areas, they would best be designated with boundaries that facilitate these energy and transportation needs.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 24-228, specific issues that would be addressed through potential IOP revisions or additions include:

- Lands with undetermined status for wilderness characteristics intersect and are adjacent to the corridor. Agencies could consider an IOP to provide guidance on the review process for applications within corridors with incomplete inventories. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.
- Wildlife species connectivity and habitat have been identified within the corridor. The Agencies could consider an IOP that minimizes impacts on habitat connectivity.
- MTR-IR, VR, and SUA intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 24-228 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 29-36 Mountain Home Corridor

Agency Jurisdictions

Bureau of Land Management

Four Rivers Field Office
Jarbidge Field Office

Idaho Counties

Ada County
Elmore County

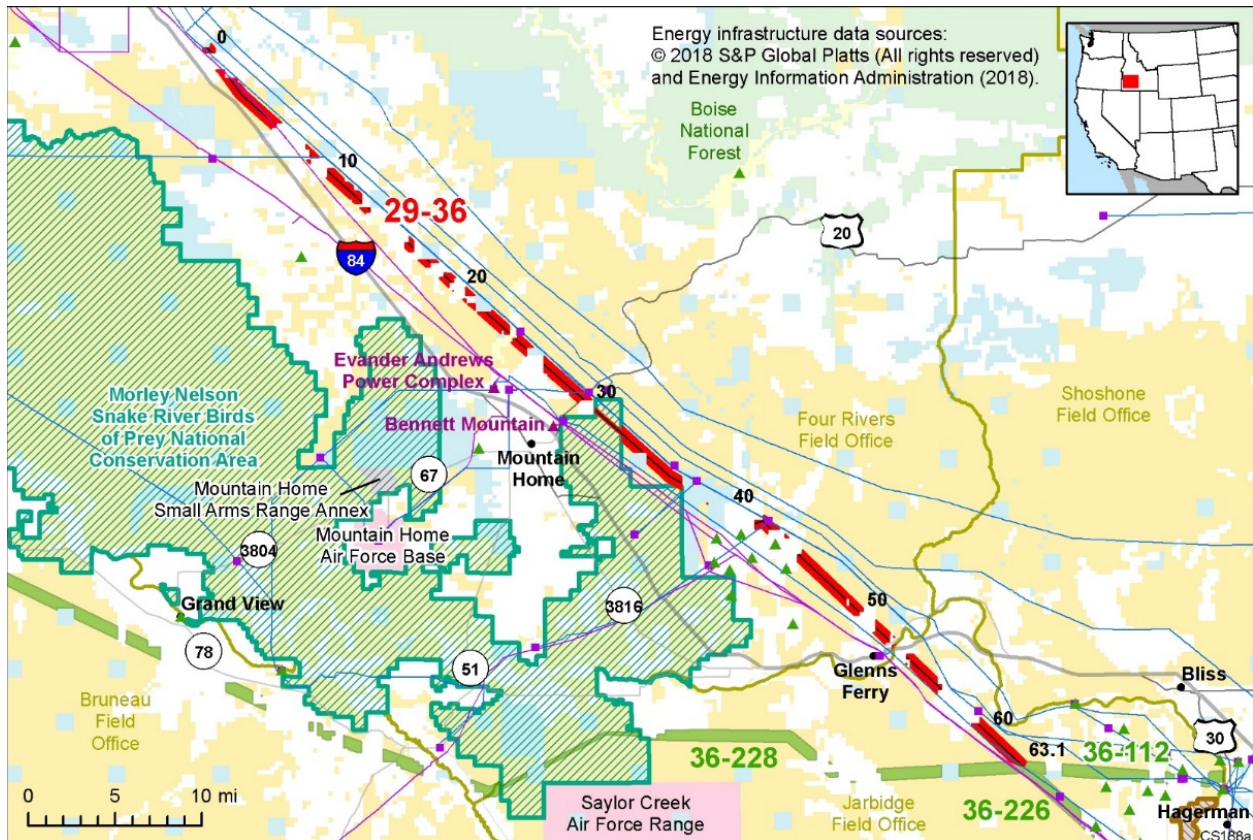


Figure 3.5-22. Corridor 29-36 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

- Jarbidge RMP (2015)
- Kuna MFP (1983)
- Snake River Birds of Prey NCA RMP and ROD (2008)
- IDMT GRSG ARMPA (2019)

Corridor width: 1,000 ft from MP 31 to MP 33, remainder 3,500 ft.
Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 10 to MP 12, shift the corridor northeast to better align with existing infrastructure and avoid the Slickspot Peppergrass critical habitat.

From MP 46 to MP 50, shift the corridor to the northeast to better align with existing infrastructure and avoid a portion of the Four Trails Feasibility Study Trail and VRM Class I area.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 36-112 to the east and Corridor 36-226 to the south) and creating an interstate pathway for electrical and pipeline transmission between Nevada and Idaho. The potential minor revisions would minimize impacts on special status species, the Four Trails Feasibility Study Trail, and visual resources while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 500-kV transmission line). The potential for additional projects may be limited because of the density of existing and planned infrastructure within and adjacent to the corridor, however, the potential corridor revision for Corridor 36-112 along the recently authorized Gateway West route would connect to Corridor 29-36 at MP 45 and could provide an alternate southwest route for future energy infrastructure.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 29-36, specific issues that would be addressed through potential IOP revisions or additions include:

- Oregon NHT and the Four Trails Feasibility Study Trail intersect the corridor. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 29-36 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 36-112 West Twin Falls Corridor

Agency Jurisdictions

Bureau of Land Management

Jarbidge Field Office
Shoshone Field Office

Idaho Counties

Elmore County
Gooding County
Jerome County
Twin Falls County

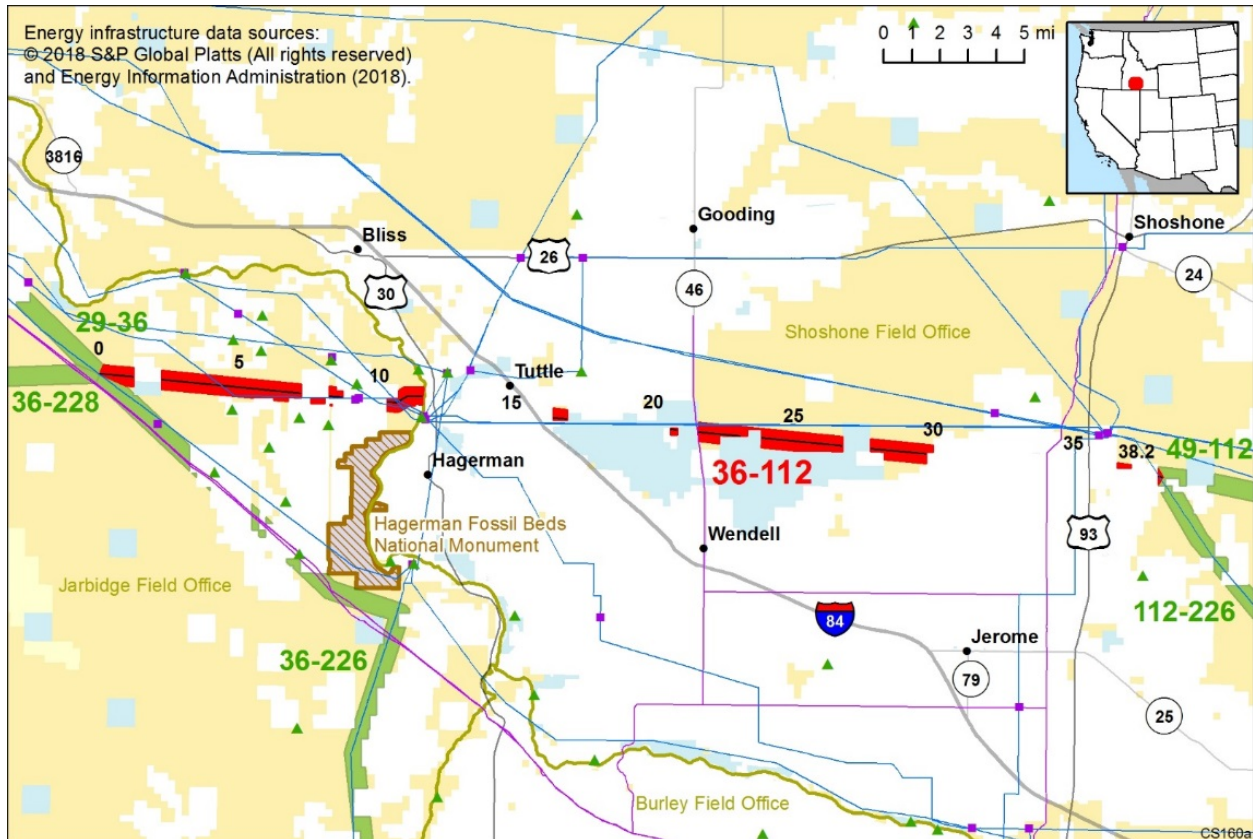


Figure 3.5-23a. Corridor 36-112 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Jarbidge RMP (2015)
Monument RMP (1986)
IDMT GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Re-route the corridor along the Gateway West approved route (and existing infrastructure) beginning at MP 46 of Corridor 29-36 connecting to Corridor 36-112 at the end of the corridor (MP 38) (Figure 35-23c). Routing the corridor along Gateway West would avoid the Oregon NHT, Snake River WSR, and non-federal lands (including prime farmland) but it would increase the area of intersection with VRM Class II and GRSB GHMA.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The potential revision would minimize impacts on the Oregon NHT, Snake River WSR, and non-federal lands to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with the recently authorized Gateway West Transmission Project. The potential revision would promote efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridors 29-36 and 36-228 to the west, Corridor 49-112 to the east, and Corridors 36-226 and 112-226 to the south), creating a pathway for electrical and pipeline transmission in southern Idaho.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Concern regarding impacts from proliferation of access roads; early planning is needed to avoid spiral networks. The existing IOP regarding access roads could be improved.

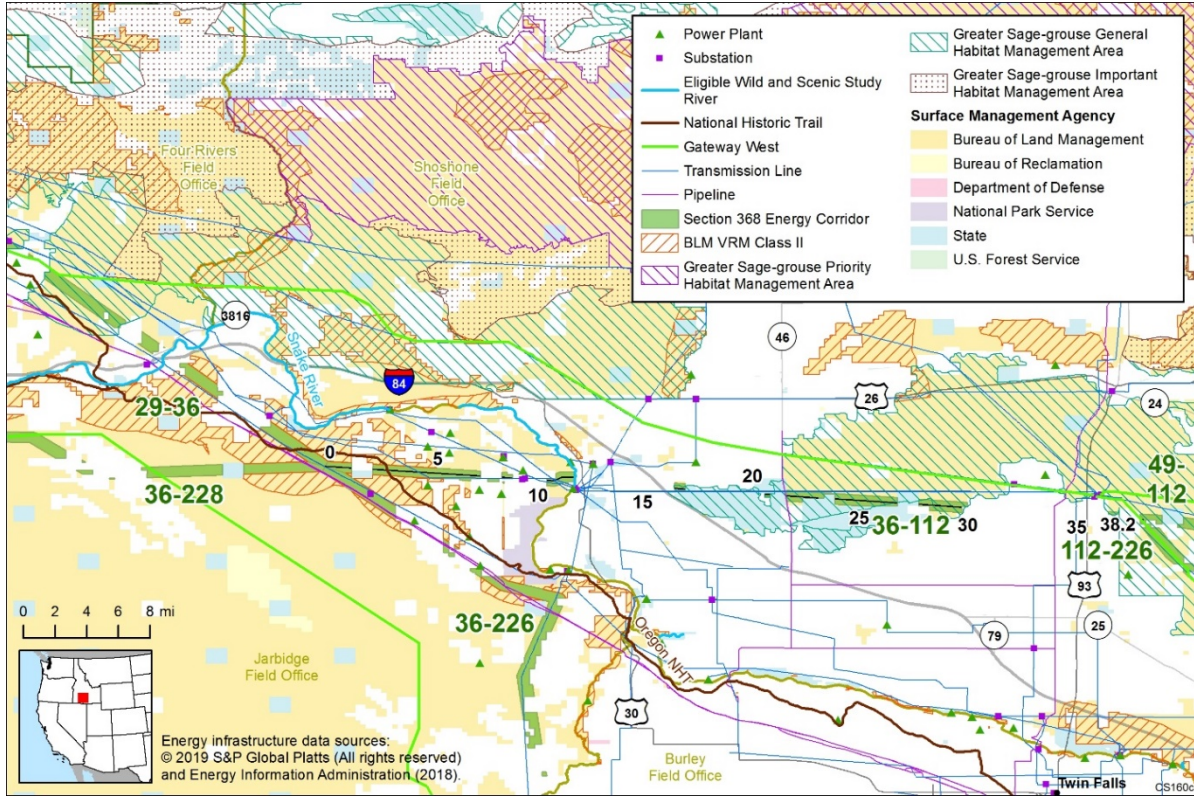


Figure 3.5-23b. Corridor 36-112 as designated

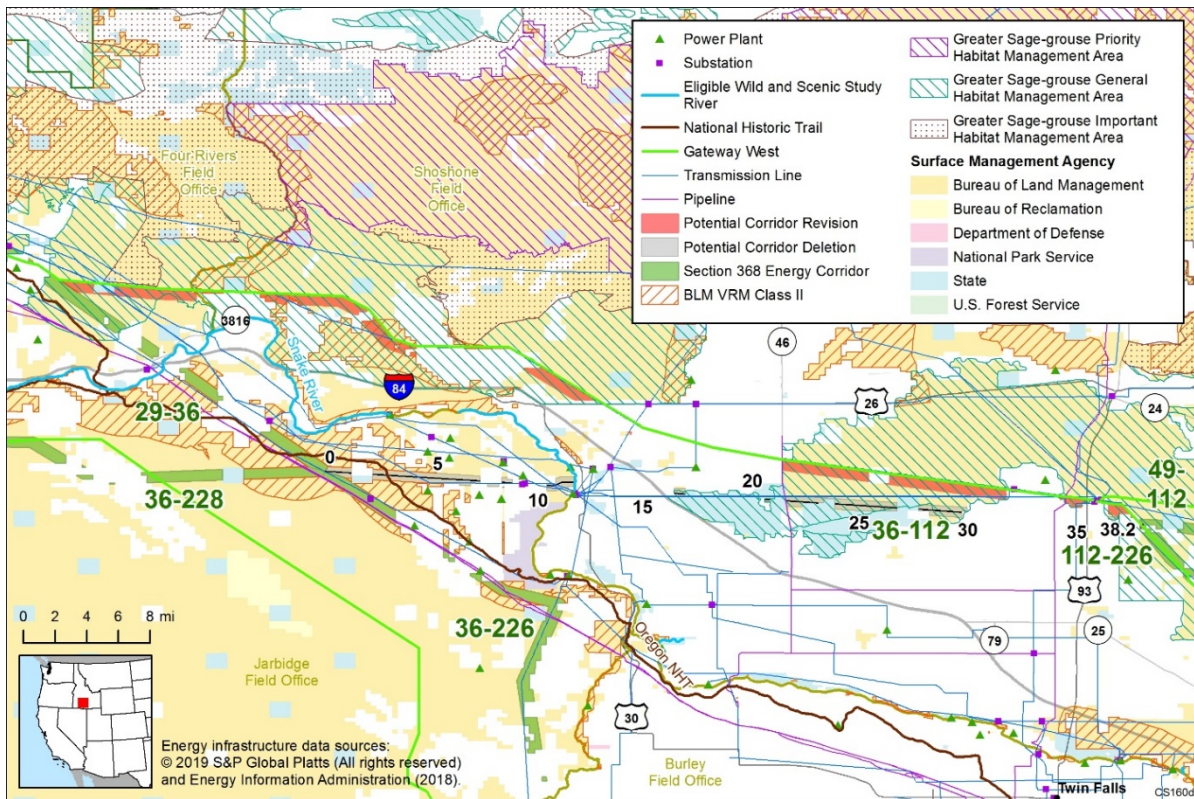


Figure 3.5-23c. Potential Revision to Corridor 36-112

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 36-112, specific issues that would be addressed through potential IOP revisions or additions include:

- The Oregon NHT and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 36-112 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 36-226 West Twin Falls Corridor

Agency Jurisdictions

Bureau of Land Management

Burley Field Office
Jarbidge Field Office

Idaho Counties

Elmore County
Twin Falls County

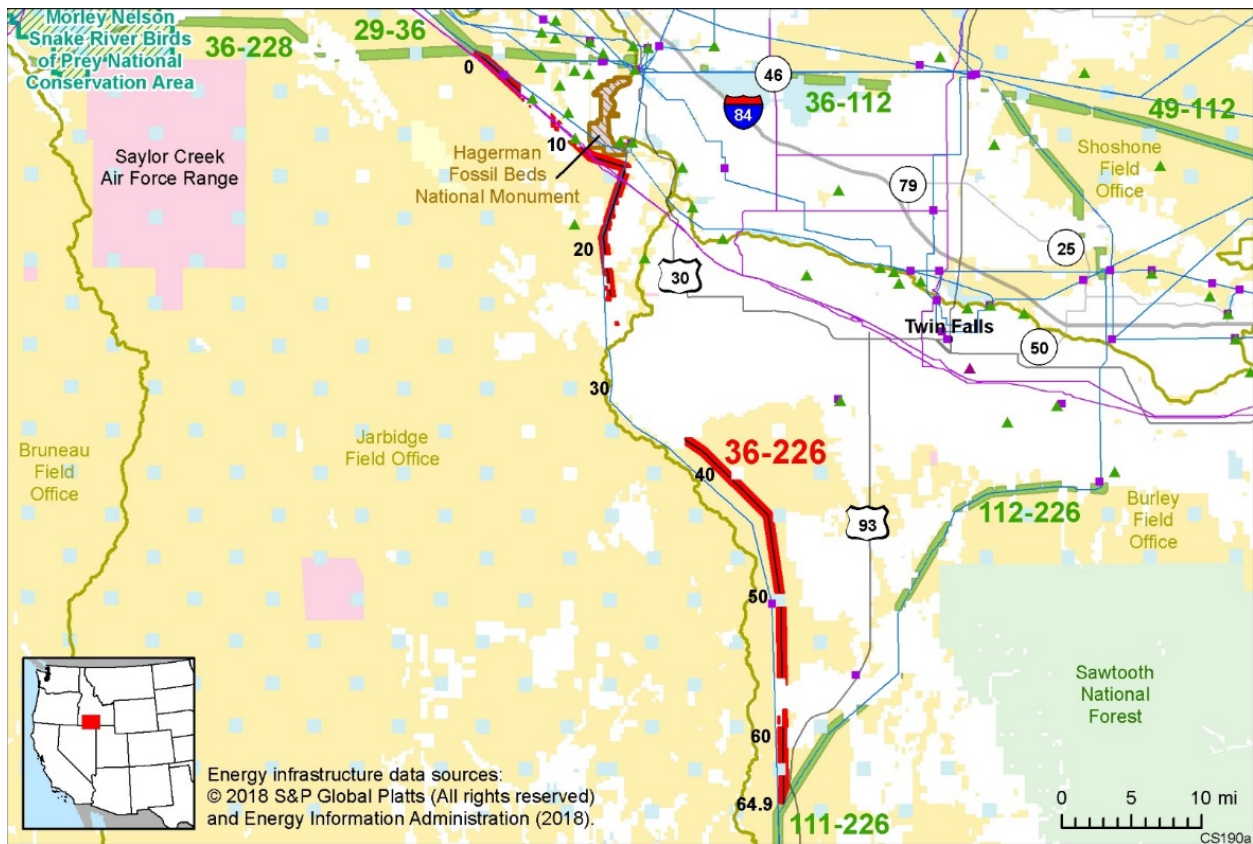


Figure 3.5-24a. Corridor 36-226 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Jarbidge RMP (2015)
Twin Falls MFP (1982)
IDMT GRSG ARMPA (2019).

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Shift the corridor along the recently authorized Gateway West route (beginning at MP 8 of Corridor 36-228 and connecting to Corridor 36-226 at MP 42) (Figure 3.5-24c). Between MP 40 and MP 64.9, shift corridor slightly to the west to have the existing 116-kV transmission line as its western boundary (Figure 3.5-24c).
- Add a secondary route or corridor braid along Gateway West connecting Corridor 36-226 (MP 42) to Corridor 112-226 (MP 38) (Figure 3.5-24c).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The recently approved 500-kV Gateway West transmission project is located approximately 7 miles west of, and parallel to, the corridor for most of its length. The potential revision would collocate with the recently authorized Gateway West Transmission Project and avoid sensitive areas, including the Oregon NHT, Fossil Beds National Monument, and non-federal lands (including prime farmland) to the greatest extent possible. The potential revision would also create a preferred route for potential future energy development by connecting multiple Section 368 energy corridors, creating an interstate pathway for electrical and pipeline transmission between Nevada and Idaho. There has been interest in wind energy that could support the corridor.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Separation requirements for transmission lines could result in larger visual impacts/visual intrusion.
- Non-native vegetation and noxious weeds, noise impacts, habitat destruction and wildlife impacts, cultural concerns, and lands with wilderness characteristics.

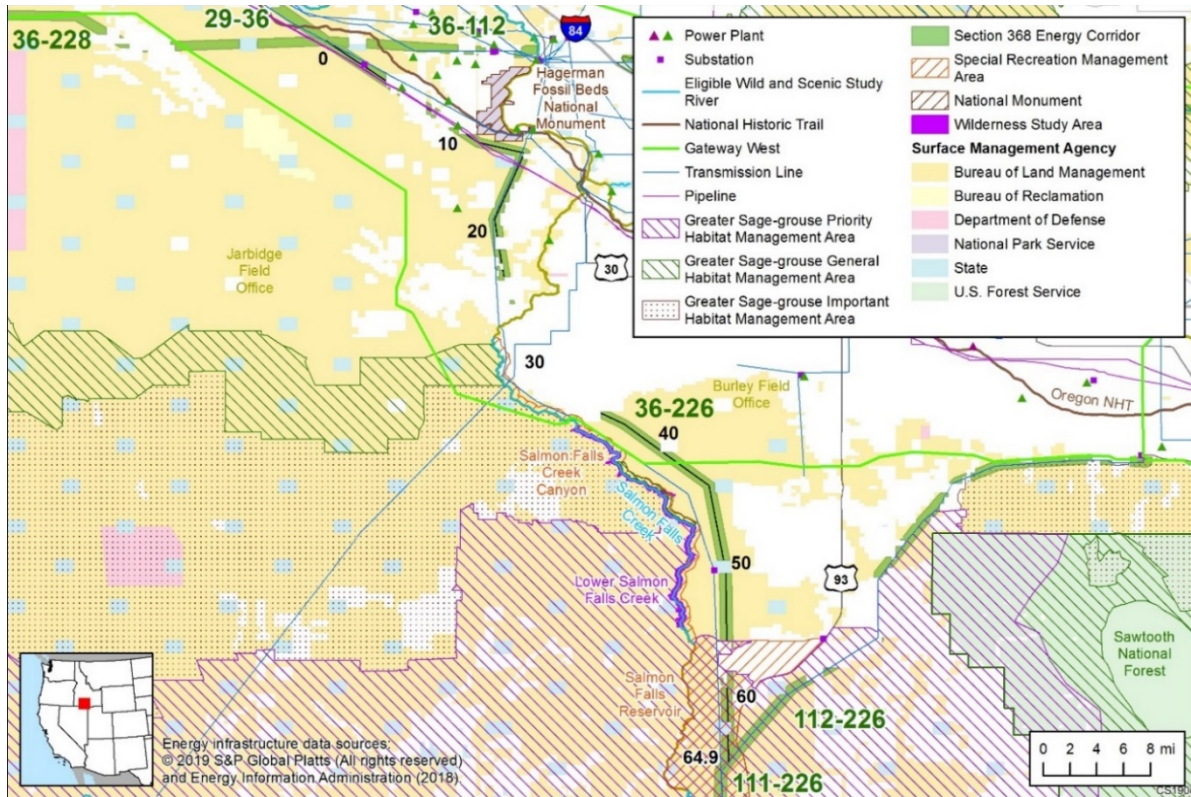


Figure 3.5-24b. Corridor 36-226, as designated

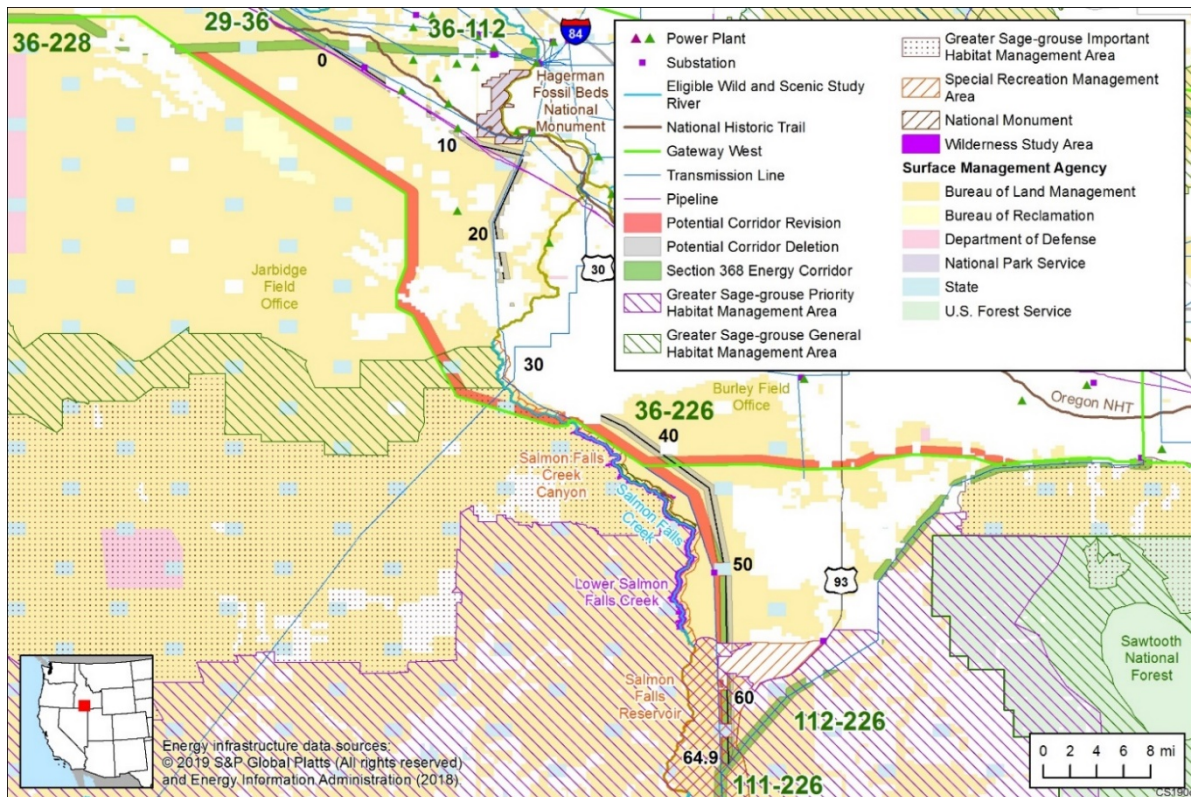


Figure 3.5-24c. Potential Revision to Corridor 36-226

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 36-226, specific issues that would be addressed through potential IOP revisions or additions include:

- The Oregon NHT is parallel to, but does not intersect, the corridor. Agencies could consider new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 36-226 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 36-228 Twin Falls to Boise Corridor

Agency Jurisdictions

Bureau of Land Management

Bruneau Field Office
 Four Rivers Field Office
 Jarbidge Field Office
 Owyhee Field Office

Idaho Counties

Elmore County
 Owyhee County

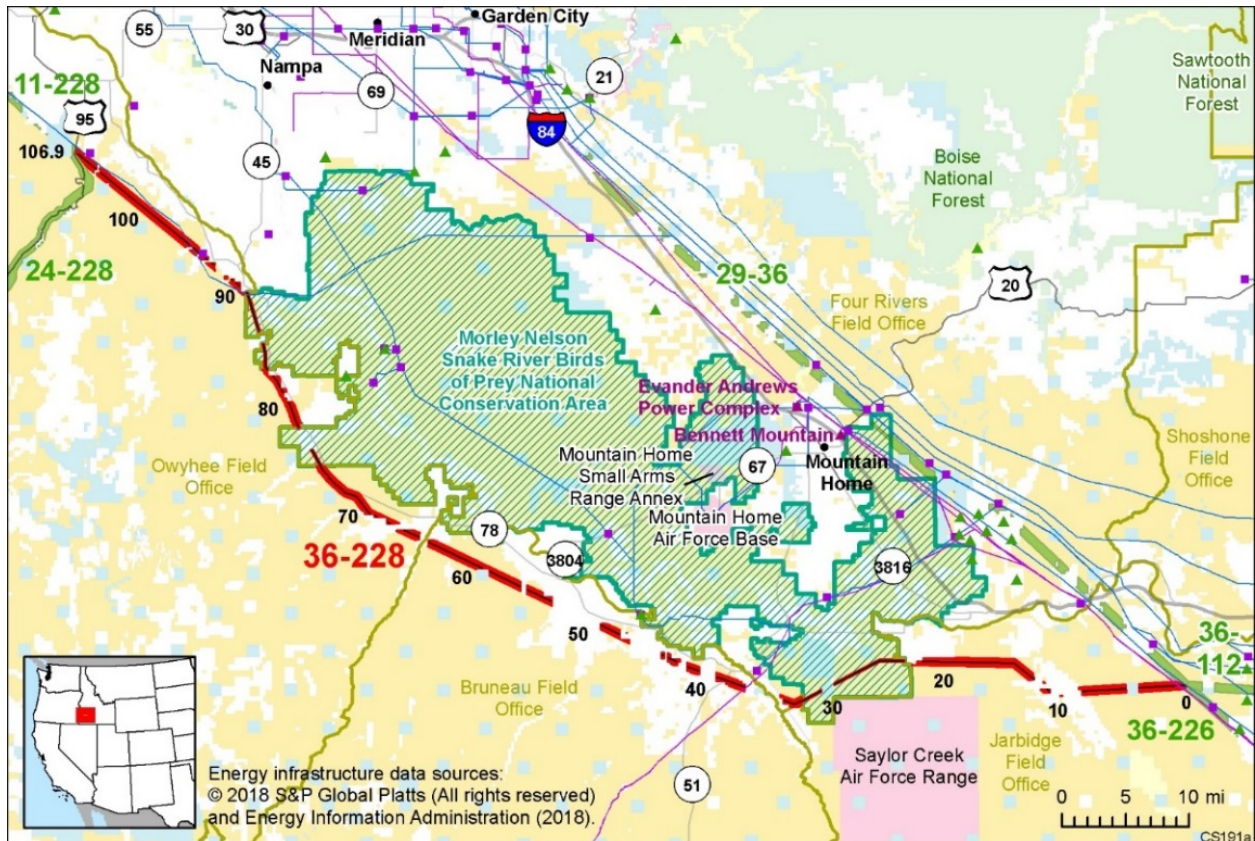


Figure 3.5-25a. Corridor 36-228 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Bruneau MFP (1983)
 Jarbidge RMP (2015)
 Kuna MFP (1983)
 Owyhee RMP (1999)
 Snake River Birds of Prey NCA RMP and ROD (2008)
 IDMT GRSG ARMPA (2019)

Corridor width: 1,000 ft in Four Rivers Field Office, remainder 3,500 ft.
 Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Re-route the corridor to avoid private lands in Owyhee County where there is no existing infrastructure and there is strong local opposition to future development within the corridor (Figure 3.5-25c).

Re-align the corridor along the recently authorized Gateway West route (beginning at MP 89 connecting to Corridor 29-36 at MP 12) where it crosses the Morley Nelson Snake River Birds of Prey NCA.

Re-align corridor along BLM land south of current corridor location (possibly along Gateway West alternative 9E) from MP 32 to MP 95.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The potential revision through the NCA would be dependent on the whether or not it is compatible with the purposes of the NCA, emphasizing habitat protection with economic development. The NCA Management Plan restricts major utility developments to the two Section 368 energy corridors (Corridors 36-228 and 29-36). Owyhee County opposes the current location of Corridor 36-228 because it crosses private land used for agriculture and grazing where there is currently no infrastructure. Gateway West did not route its transmission line through the corridor because of strong local government opposition and the corridor is unlikely to be developed in the future. The potential revision through the NCA creates a preferred route for potential future energy development by connecting multiple Section 368 energy corridors between energy hubs and collocating with the recently authorized Gateway West Transmission Project, a major energy pathway.

The potential corridor revision along the Gateway West Alternative 9E would avoid private lands in Owyhee County and would avoid crossing the Morley Nelson Snake River Birds of Prey NCA. The potential revision would not follow existing infrastructure (potentially increasing future impacts), but it would create a preferred route for potential future energy development by connecting multiple Section 368 energy corridors.

Either potential corridor revision would promote efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridors 11-228 and 24-228 to the west and Corridors 29-36, 36-226, and 36-112 to the east), creating a continuous east-west interstate corridor network across BLM- and USFS-administered lands from Oregon across Idaho. The potential corridor revisions would avoid private land to the greatest extent possible. There is interest in solar energy development in the area and the corridor could facilitate the transmission of solar energy.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Developing infrastructure on private land would preclude future use of the land for agriculture and grazing.

- Corridor 29-36 is not redundant with Corridor 36-228. Corridor 29-36 contains a lot of infrastructure; therefore, future capacity might be limited.
- There is interest in solar energy development in the area.
- Consider routing corridor straight west from alternate southern route to connect to Corridor 24-228. This would eliminate some additional crossing of the NCA (MP 75 to 77; MP 83 to 84), but would cross more private land, and undisturbed area (roads, etc.)

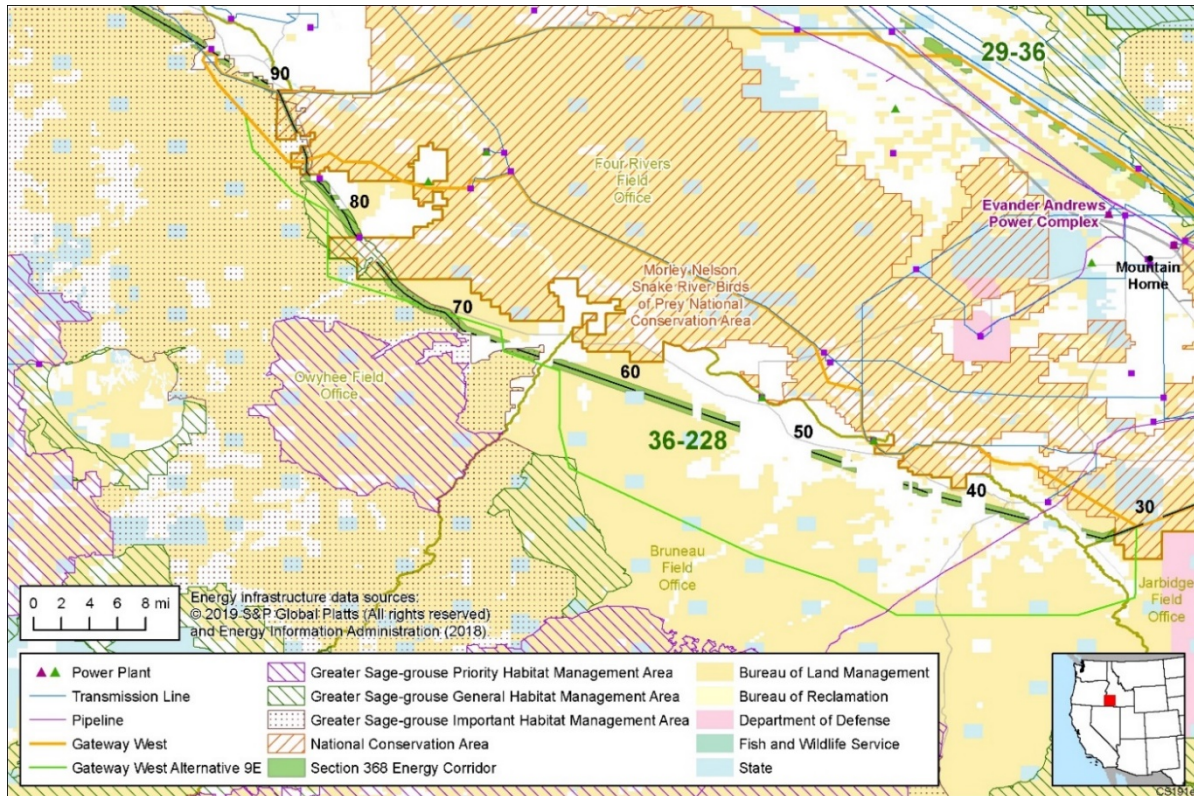


Figure 3.5-25b. Corridor 36-228, as designated

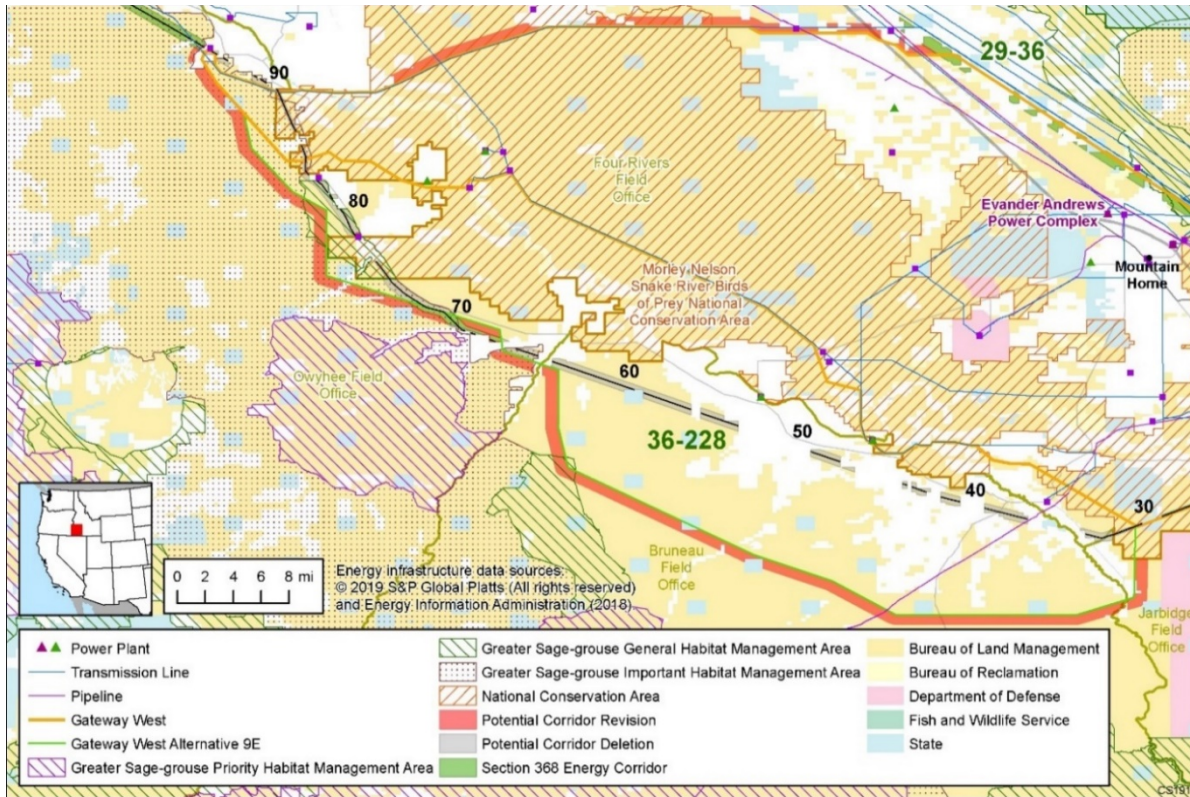


Figure 3.5-25c. Potential Revision to Corridor 36-228

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 36-228, specific issues that would be addressed through potential IOP revisions or additions include:

- The Oregon NHT is parallel to, but does not intersect, the corridor. Agencies could consider new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- SUA and the corridor intersect. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 36-228 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 49-112 Burley Corridor

Agency Jurisdictions

Bureau of Land Management

Burley Field Office
Shoshone Field Office

Idaho Counties

Blaine County
Jerome County
Lincoln County
Minidoka County
Power County

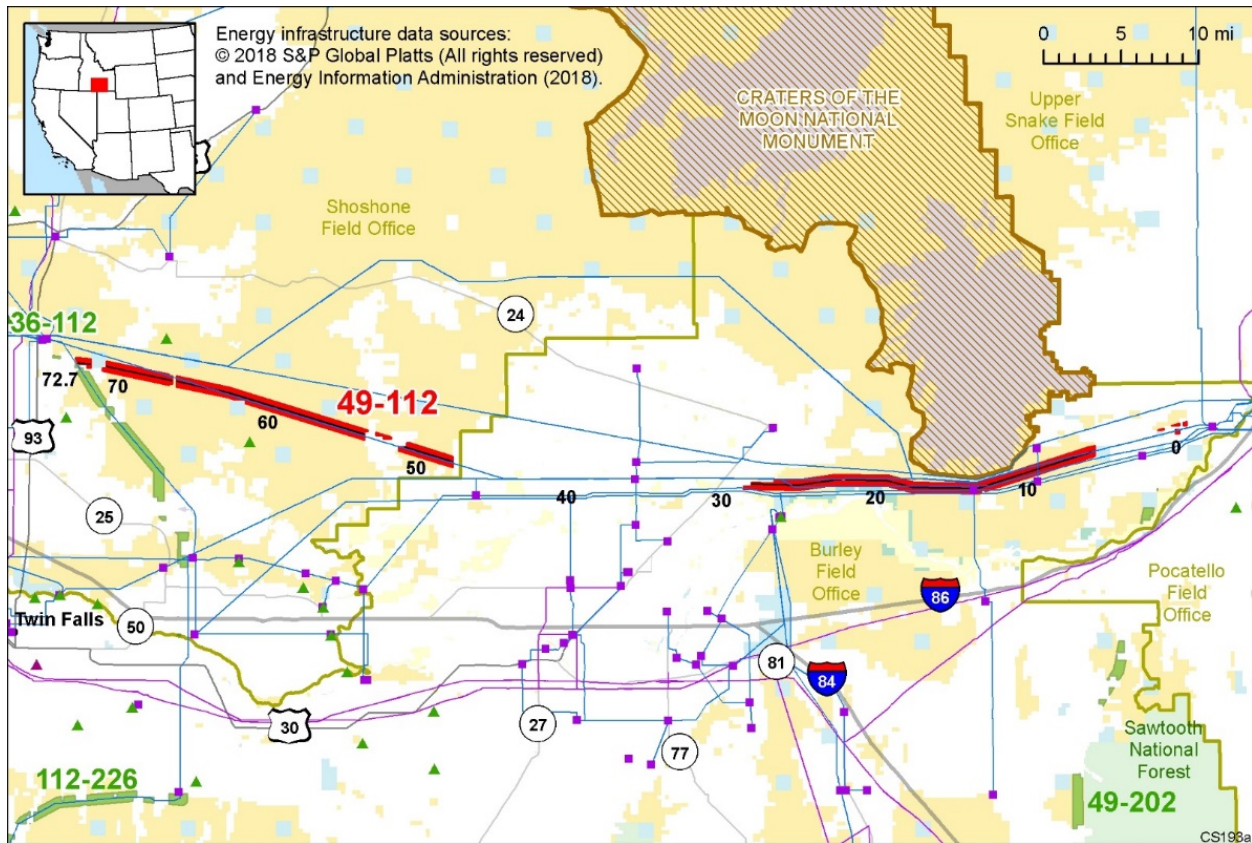


Figure 3.5-26a. Corridor 49-112 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Monument RMP (1986)
IDMT GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- At MP 13, route the corridor along the authorized Gateway West route, connecting to the potential revision for Corridor 36-112, to better collocate with existing and planned infrastructure (see Figure 3.5-26c). Both routes intersect with large areas of GRSG GHMA.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 36-112 to the west and Corridor 112-226 to the south), creating an interstate pathway for electrical and pipeline transmission east-west between Idaho and Oregon and south into Utah. There has been interest in wind, geothermal, and solar energy that could support the corridor. The potential corridor revision would maximize utility by collocating with planned infrastructure, increasing the capacity within the corridor and avoiding non-federal lands to the greatest extent possible.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- There was concern that the potential revision to follow authorized Gateway West route could result in higher impacts on GRSG, if the potential new route provides more new perching opportunities for raptors near the Craters of the Moon National Monument. Impacts on GRSG should be minimized by use of anti-perching devices on transmission lines.

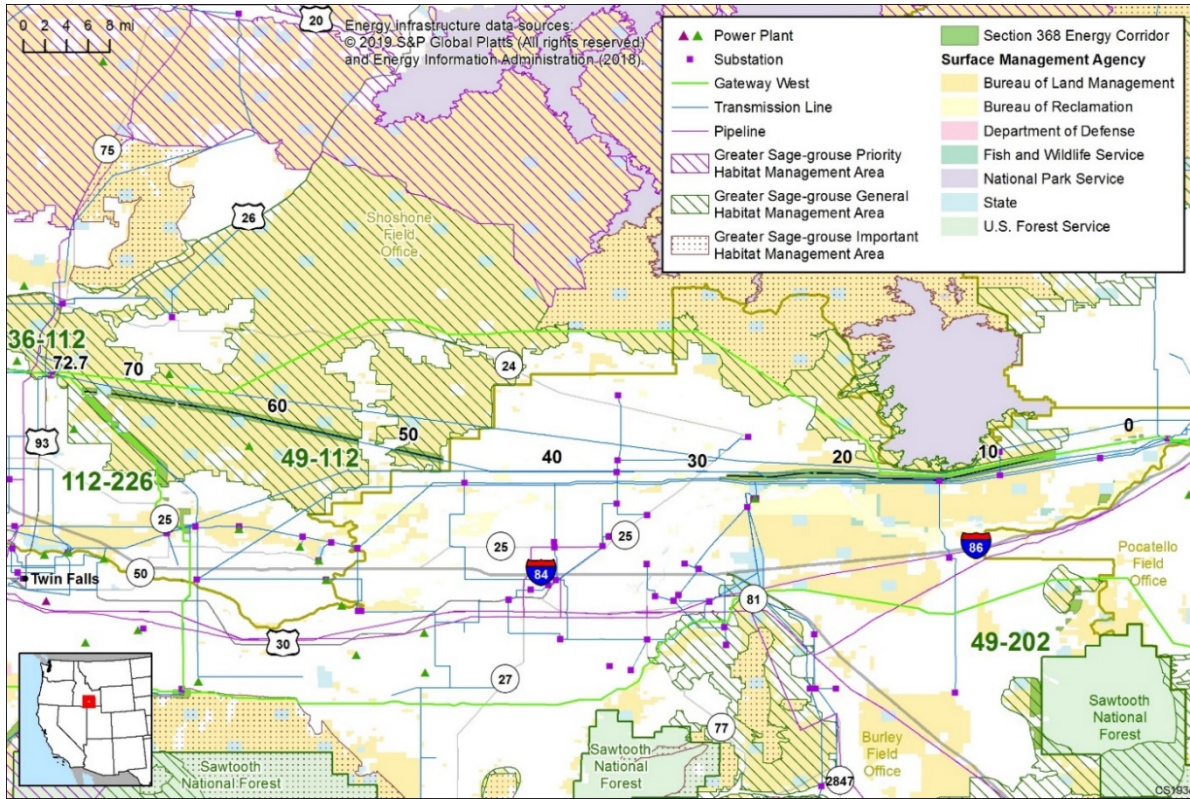


Figure 3.5-26b. Corridor 49-112, as designated

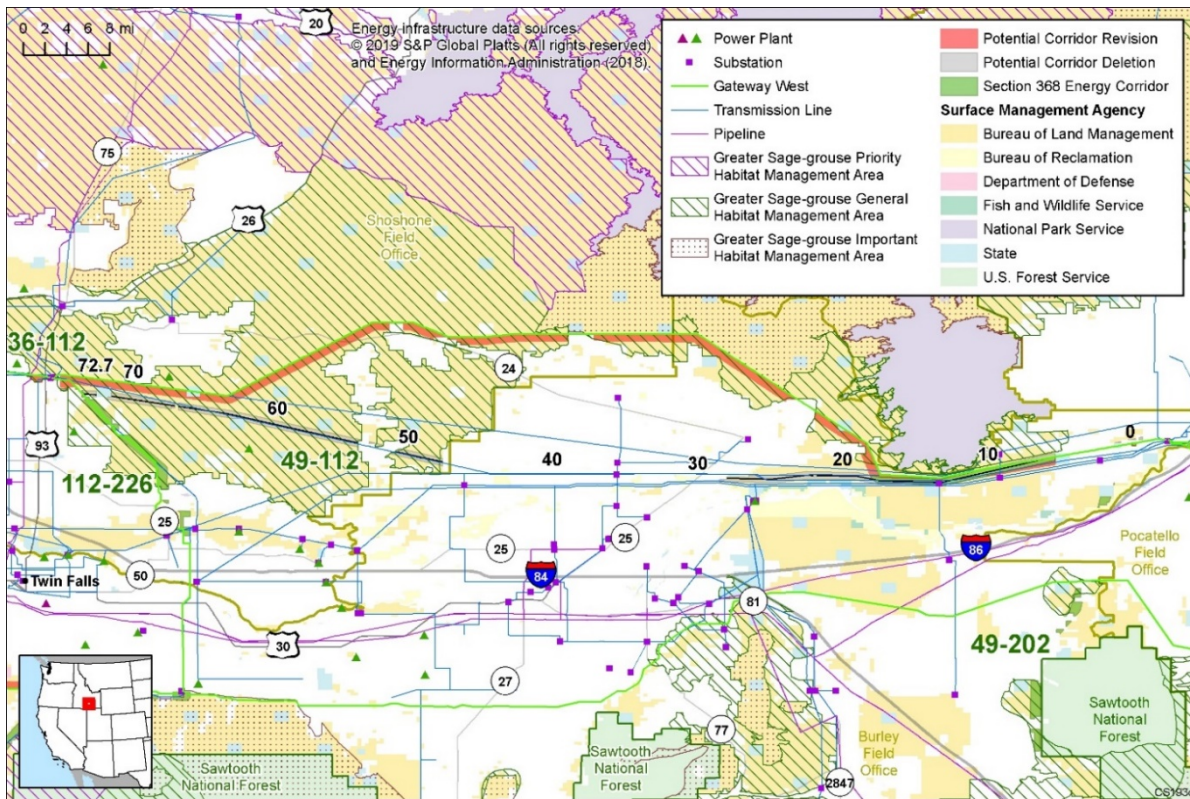


Figure 3.5-26c. Potential Revision to Corridor 49-112

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 49-112, specific issues that would be addressed through potential IOP revisions or additions include:

- MTR-VR and IR intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 49-112 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 49-202 American Falls to Snowville Corridor

Agency Jurisdictions

Bureau of Land Management

Burley Field Office
Pocatello Field Office

Idaho Counties

Cassia County
Oneida County
Power County

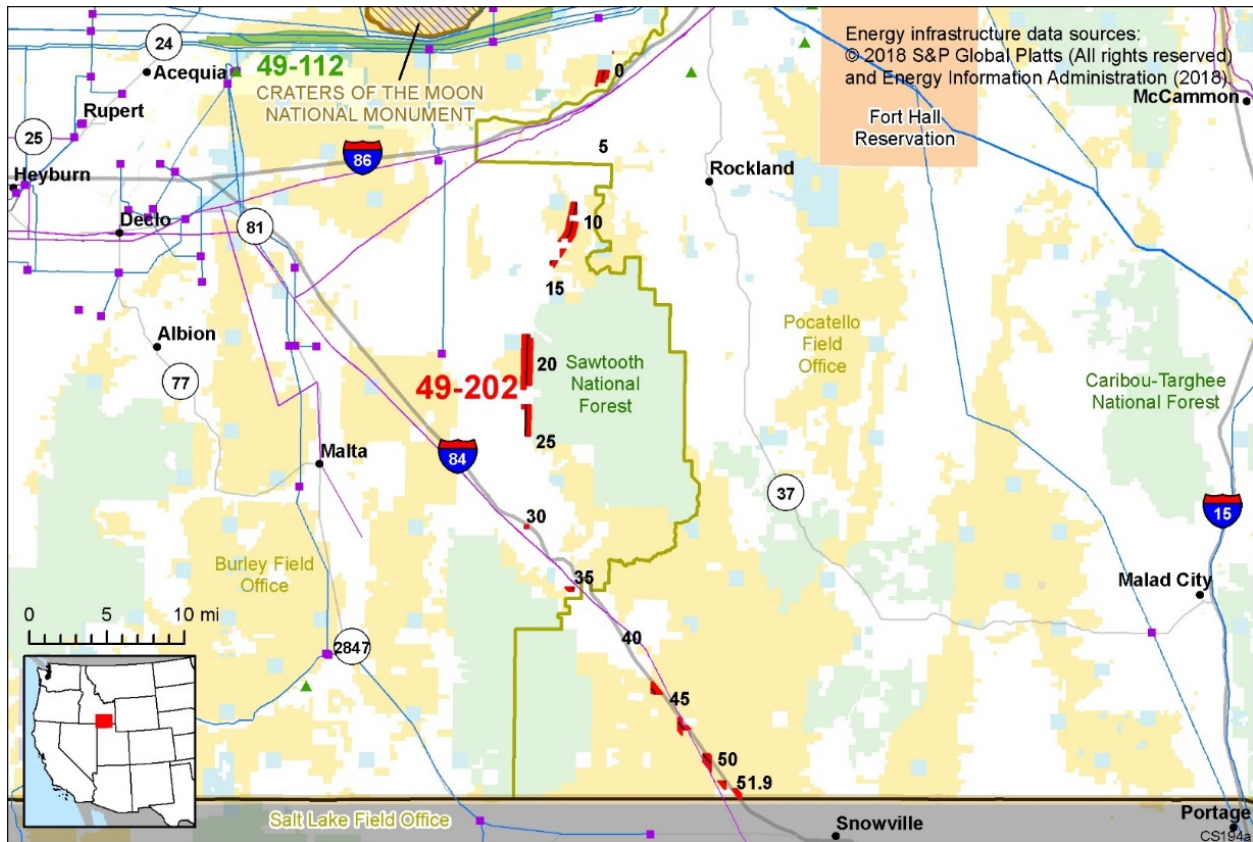


Figure 3.5-27. Corridor 49-202 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Cassia MFP (1985)
Monument RMP (1986)
Pocatello RMP (2012)
IDMT GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 0 to MP 1, shift the corridor west to federal lands outside of the Cedar Fields SRMA.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a pathway for energy transport from southern Idaho into Utah. The potential minor revision would minimize impacts on the SRMA to the greatest extent possible while maintaining a preferred route for potential future energy development.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 49-202, specific issues that would be addressed through potential IOP revisions or additions include:

- Although the Oregon and California NHTs are located between designated corridor segments, the Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 49-202 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 50-51 Dillon to Divide Corridor

Agency Jurisdictions

Bureau of Land Management

Butte Field Office
Dillon Field Office

Montana Counties

Beaverhead County
Madison County
Silver Bow County

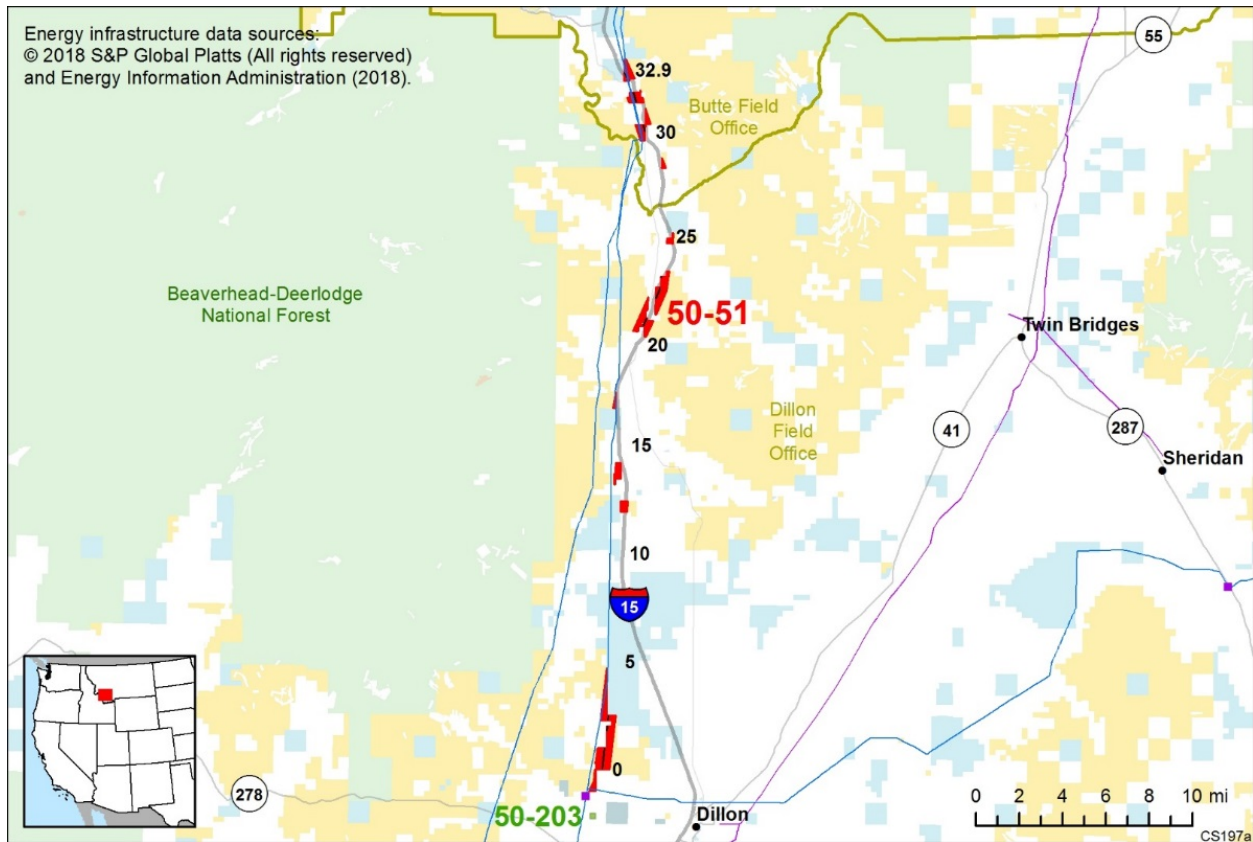


Figure 3.5-28a. Corridor 50-51 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Butte ROD and RMP (2009)
Dillon RMP (2006)
IDMT GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).

From MP 12 to MP 33, shift corridor outside of the highway corridor to the existing 230-kV transmission line to the west.

- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 50-203), creating an interstate pathway for electrical and pipeline transmission between Montana and Idaho. The potential minor revision, while moving the corridor partially into GRSG GHMA, would better avoid non-federal lands as well as the highway and would provide a preferred route for potential future energy development collocated with existing infrastructure.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Concern that subsidence/landslide issues may limit any further development.
- Concern about GRSG habitat.
- The proposed Mountain States Intertie transmission line was planned within the corridor but not built or approved.
- Additional concerns included negative electromagnetic effects, adverse recreational and visual resource impacts, fire hazards, interference with adjacent farming, and decrease in property values.
- Concern that siting energy projects on private land results in a major loss of agricultural land as well as impacts on property values, agricultural productivity, local businesses, ranching, fishing, guiding, tourism, farming, geology camps, recreation, hunting, spread of noxious weeds, permanently converting agricultural lands to non-agricultural use, and impacts on irrigation systems and irrigated crop lands.

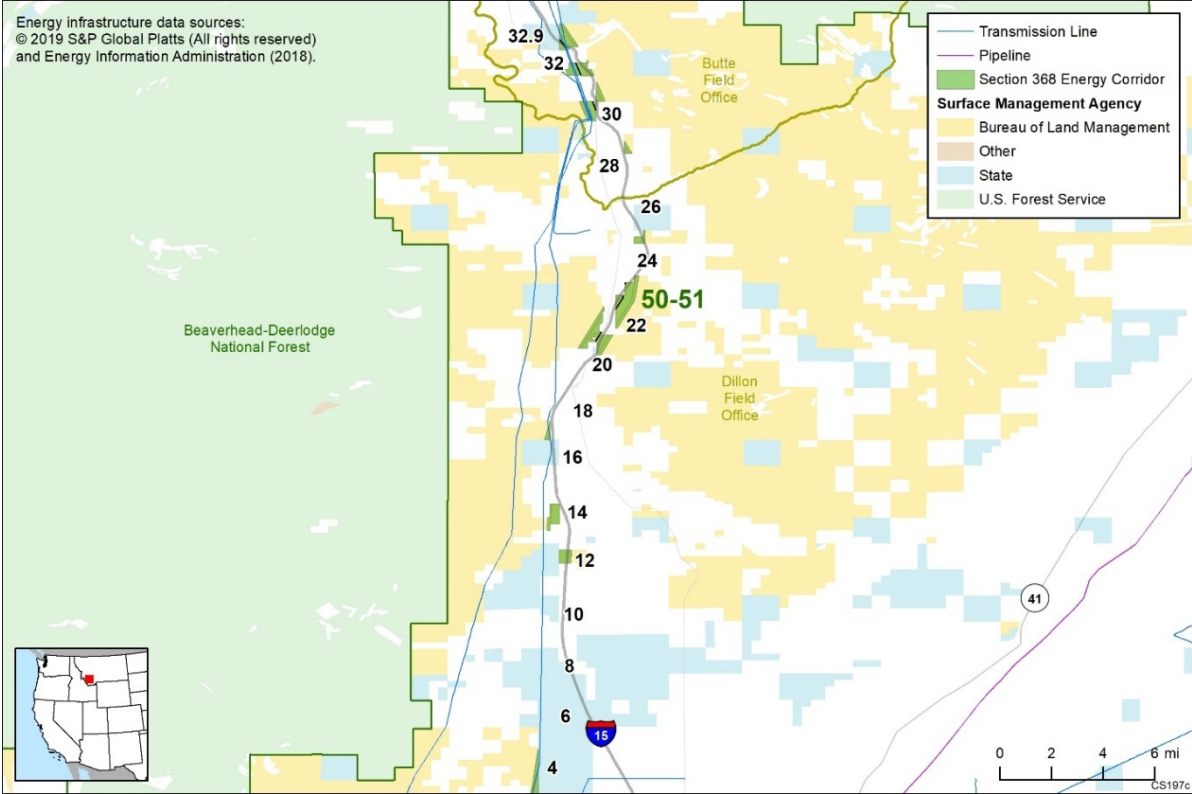


Figure 3.5-28b. Corridor 50-51, as designated

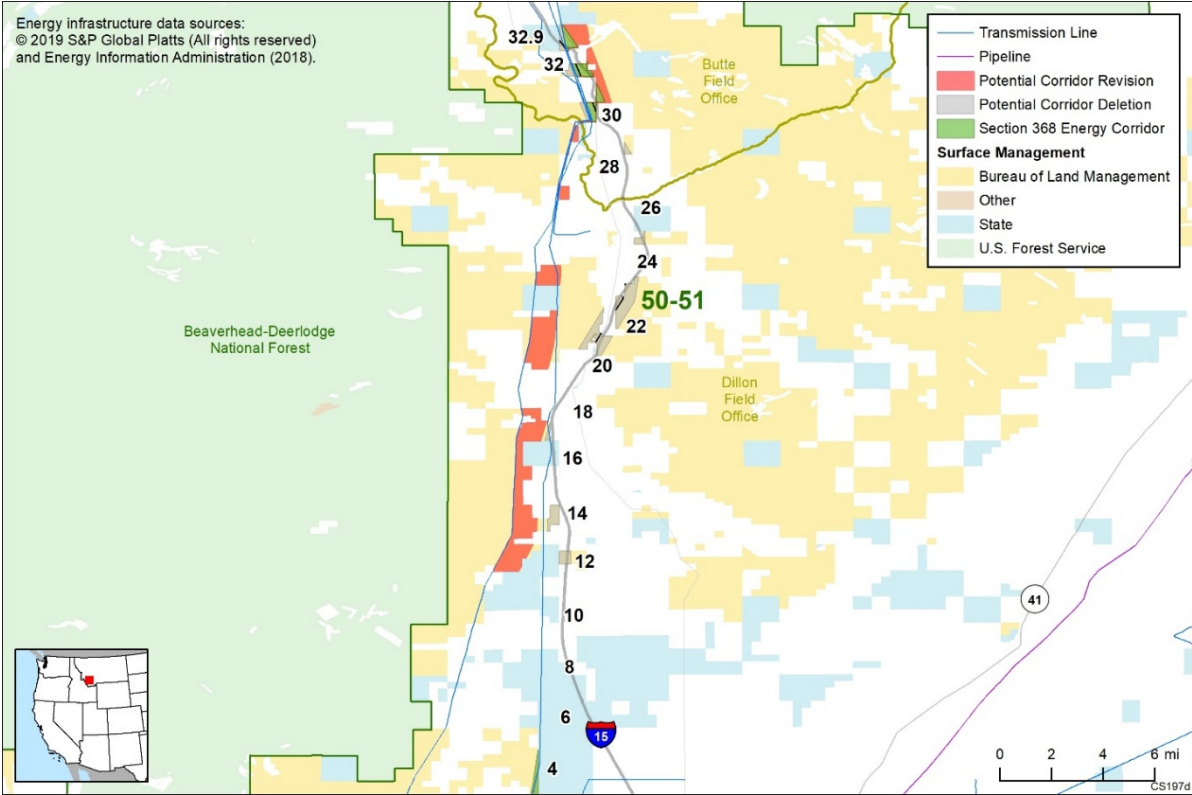


Figure 3.5-28c. Potential Revision to Corridor 50-51

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 50-51, specific issues that would be addressed through potential IOP revisions or additions include:

- Wildlife species connectivity and habitat have been identified within the corridor. The Agencies could consider an IOP that minimizes impacts on habitat connectivity.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 50-51 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 50-203 Dillon to Idaho Falls Corridor

Agency Jurisdictions

Bureau of Land Management

Dillon Field Office
Upper Snake Field Office

Forest Service

Caribou-Targhee National Forest

Idaho Counties

Bingham County
Bonneville County
Clark County
Jefferson County

Montana County

Beaverhead County

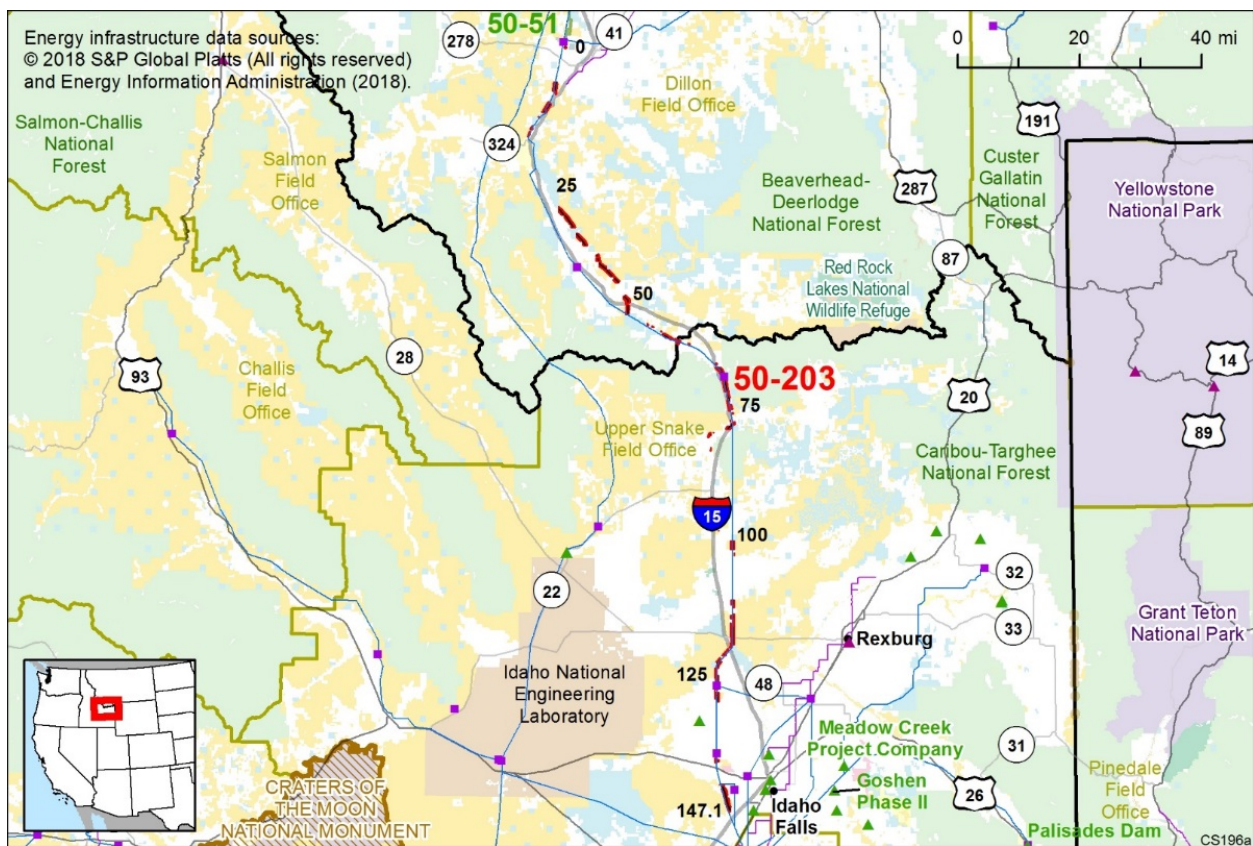


Figure 3.5-29. Corridor 50-203 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Dillon RMP (2006)
Medicine Lodge RMP (1985)
Targhee National Forest Revised Forest Plan (1997)
IDMT GRSG ARMPA (2019)

GRSG ROD for Idaho and Southwest Montana, Nevada, Utah; Attachment A – GRSG Idaho and Southwest Montana Plan Amendment (2015)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Modifications Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 10 to MP 11, shift the corridor slightly to the west so that I-15 or the existing transmission line is the eastern edge of the corridor; this would avoid the Lewis and Clark NHT and WSR Study River segment of the Beaverhead River while maintaining the corridor width on federal lands. However, the terrain along this route could make future siting of facilities difficult.

Change the VRM and VQO designations where corridor crosses VRM Class II areas and VQO Partial Retention designation areas (MP 60 to MP 77, MP 104, MP 129, MP 138 to MP 139, and MP 143 to MP 147).

There are multiple GRSG leks within two miles of the corridor; the corridor may have to be shifted to avoid these areas. However, GRSG habitat areas are prevalent on both sides of the corridor and cannot be avoided.

From MP 118 to MP 123, shift the corridor slightly northwest so that the existing transmission line is the eastern border of the corridor to reduce jurisdictional gaps and avoid the Market Lake Wildlife Management Area while maintaining corridor width on federal land.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors and creating a continuous corridor network from Idaho into Montana across BLM- and USFS-administered lands. The potential minor revisions would minimize impacts on the Lewis and Clark NHT, a WSR segment, and the Market Lake Wildlife Management Area to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Concern that siting energy projects on private land results in a major loss of agricultural land and interference with adjacent farming as well as impacts on property values, agricultural productivity, local businesses, ranching, fishing, guiding, tourism, farming, geology camps, recreation, hunting, spread of noxious weeds, permanently converting agricultural lands to non-agricultural use, impacts on irrigation systems and irrigated crop lands, negative electromagnetic effects, adverse visual resource impacts, and fire hazards.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 50-203, specific issues that would be addressed through potential IOP revisions or additions include:

- The Lewis and Clark NHT and the Continental Divide NST intersect the corridor. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- Wildlife species connectivity and habitat have been identified within the corridor. The Agencies could consider an IOP that minimizes impacts on habitat connectivity.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 50-203 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 51-204 Butte to Helena Corridor

Agency Jurisdictions

Montana County

Bureau of Land Management
Butte Field Office

Jefferson County

Forest Service

Beaverhead-Deerlodge National Forest

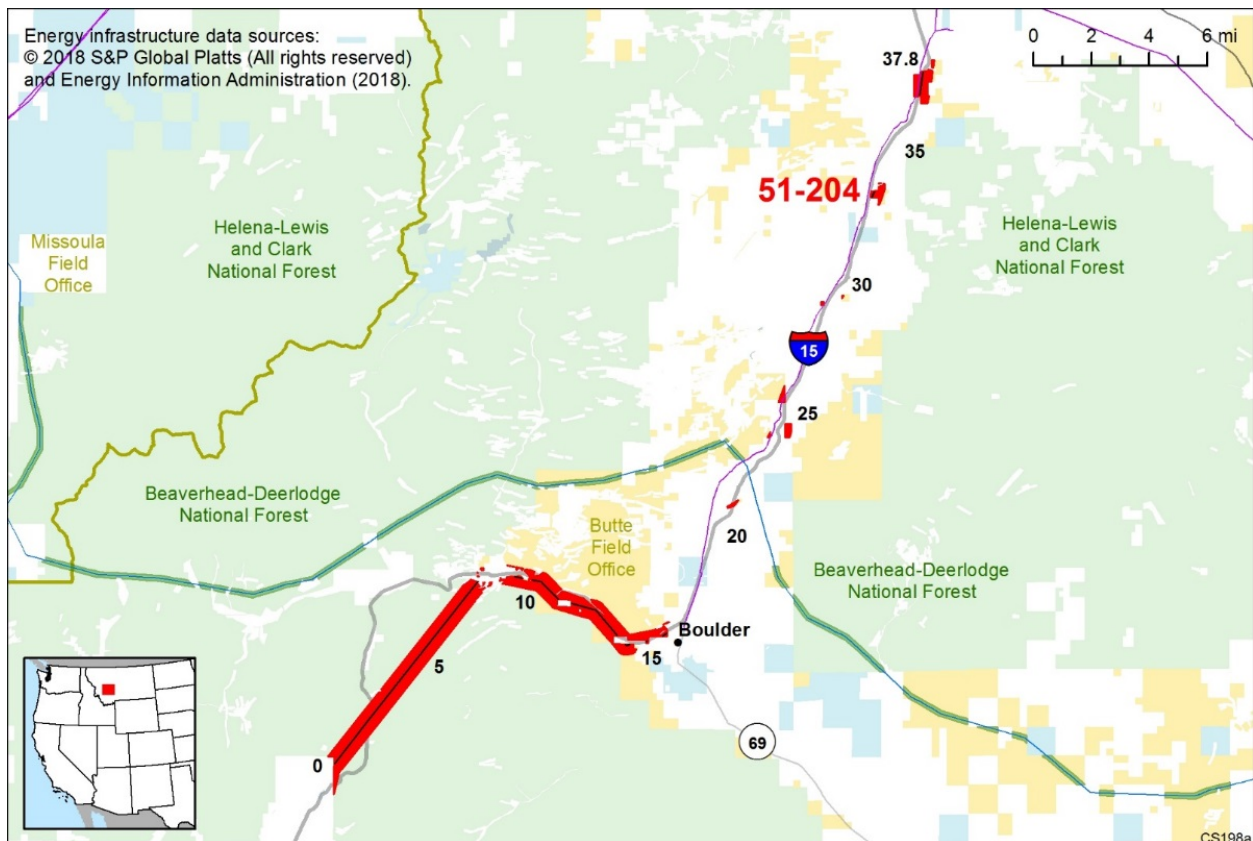


Figure 3.5-30a. Corridor 51-204 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Butte RMP (2009)

Beaverhead-Deerlodge National Forest LMP (2009)

IDMT GRSG ARMPA (2019)

GRSG ROD for Idaho and Southwest Montana, Nevada, Utah (2015)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- At MP 9, follow existing 100-kV transmission lines north intersecting Corridor 229-254 at MP 266, and following Corridor 229-254 until it joins with Corridor 51-204 at MP 22 to avoid the town of Boulder (see Figure 3-5-30b). This could also be considered as a secondary route (corridor braid) in addition to the current location.
- Delete the corridor from MP 9 to MP 38 because there is very little federal land, and the corridor intersects with the Elkhorn Mountains ACEC.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 229-254), creating a pathway for electrical and pipeline transmission in Montana. There is limited federal land, but the potential revisions would avoid the town of Boulder and an ACEC while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 100-kV transmission lines). The Agencies should engage with local government during the land use planning process when considering potential revisions.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Concern that siting energy projects on private land results in a major loss of agricultural land and interference with adjacent farming as well as impacts on property values, agricultural productivity, local businesses, ranching, fishing, guiding, tourism, farming, geology camps, recreation, hunting, spread of noxious weeds, permanently converting agricultural lands to non-agricultural use, impacts on irrigation systems and irrigated crop lands, negative electromagnetic effects, adverse visual resource impacts, and fire hazards.

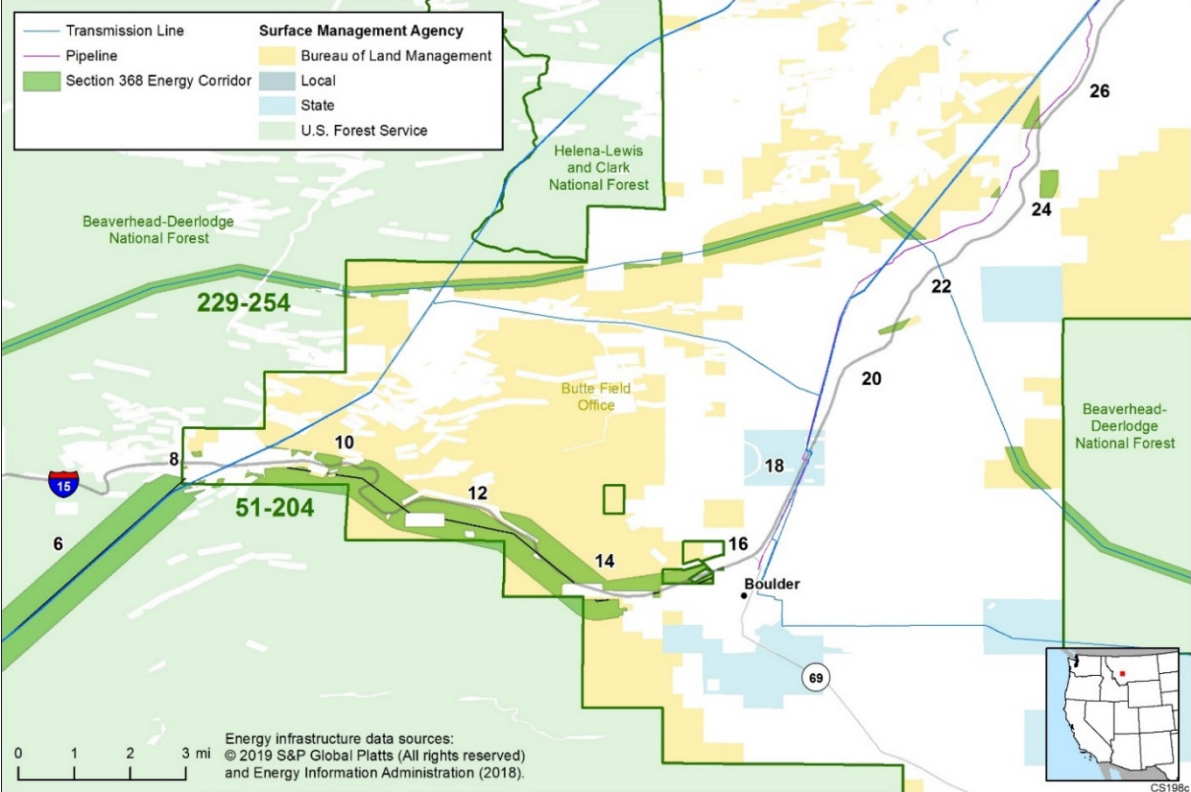


Figure 3.5-30b. Corridor 51-204, as designated

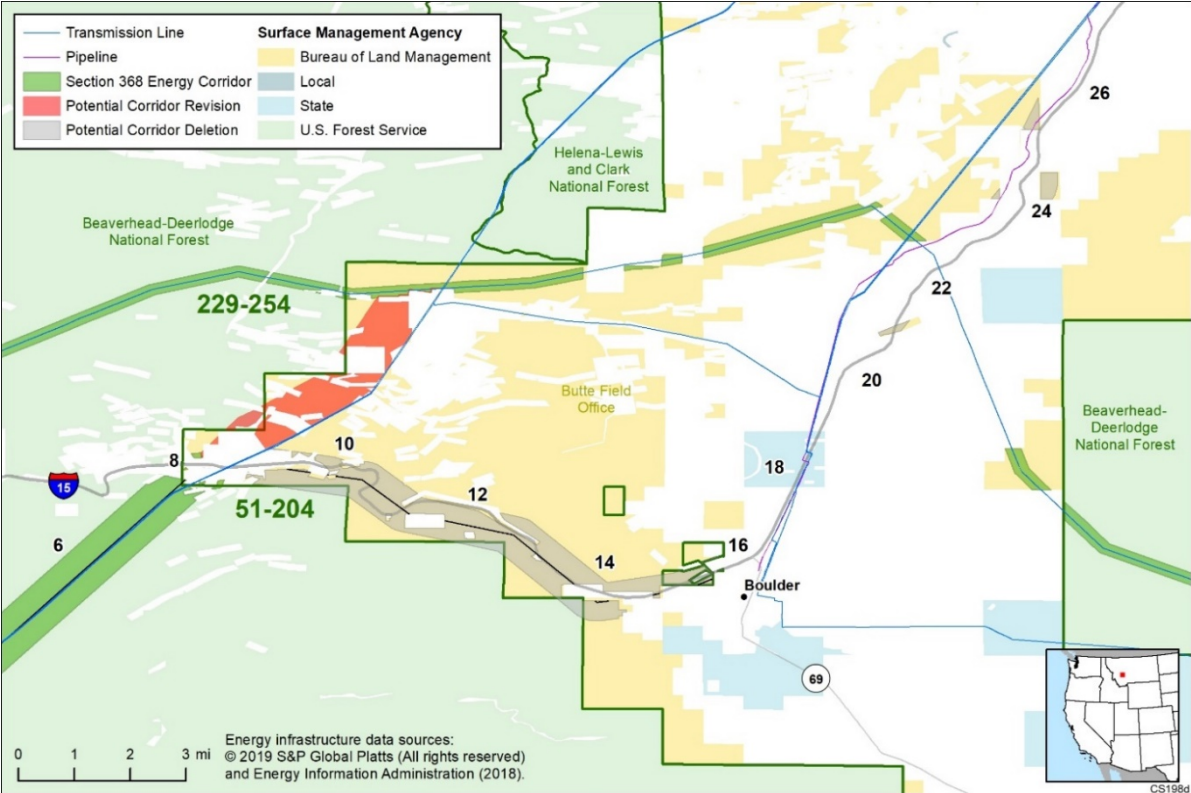


Figure 3.5-30c. Potential Revision to Corridor 51-204

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 51-204, specific issues that would be addressed through potential IOP revisions or additions include:

- The Agencies could consider an IOP for habitat connectivity so that transmission projects within Section 368 energy corridors are sited and designed in a manner that minimizes impacts on habitat connectivity.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 51-204 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 51-205 Interstate 90 Corridor

Agency Jurisdictions

Bureau of Land Management
Butte Field Office

Forest Service

Beaverhead-Deerlodge National Forest

Montana Counties

Jefferson County
Silver Bow County

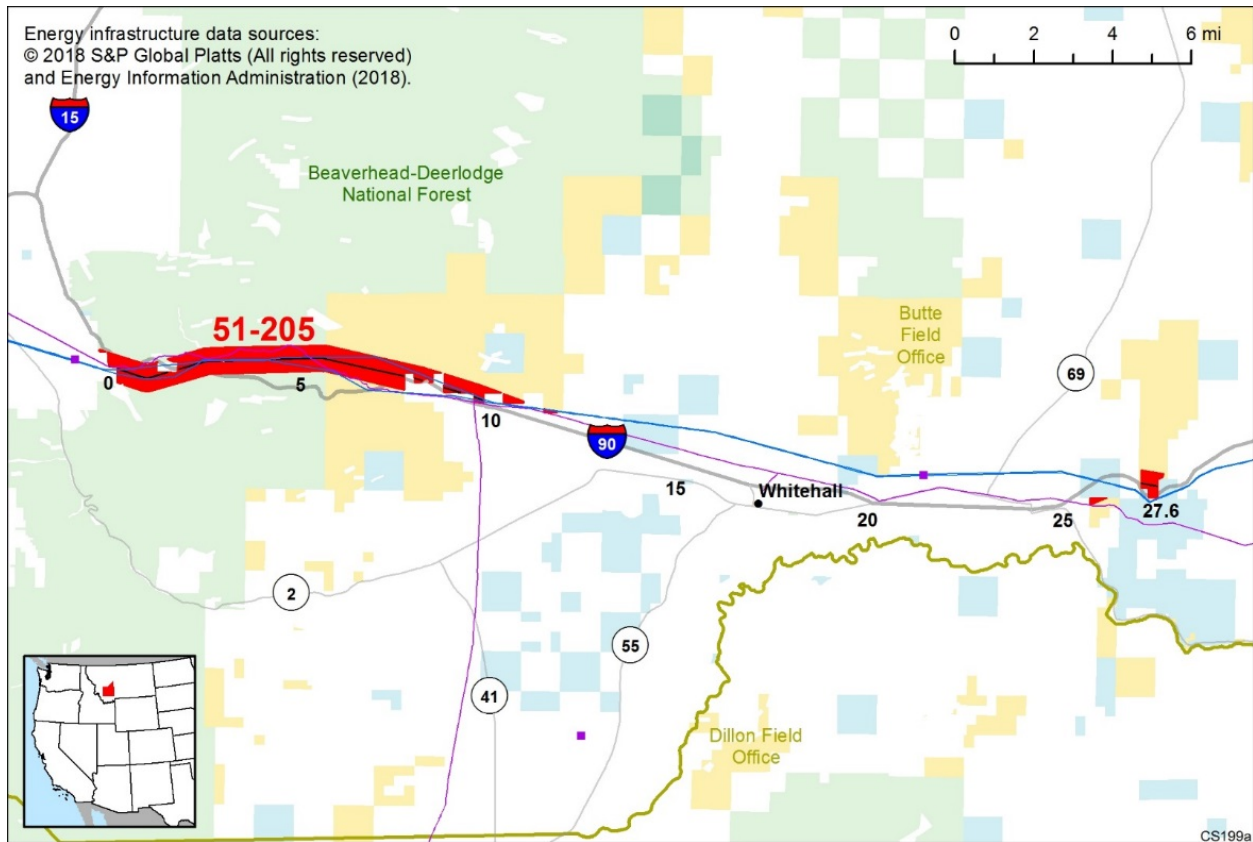


Figure 3.5-31. Corridor 51-205 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Butte RMP (2009)
Beaverhead-Deerlodge National Forest LMP (2009)
IDMT GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).

Shift the corridor north between MP 2 and MP 12 so the existing 230-kV transmission line is the southern corridor boundary, to avoid I-90 and better collocate with existing infrastructure.

- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Consider deleting corridor from MP 12 to MP 28 because there is very little federal land.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by creating an interstate pathway for electrical and pipeline transmission across Montana. The potential minor revisions would better avoid private lands and the interstate while maintaining a preferred route for potential future energy development better collocated with existing infrastructure.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Corridor is fragmented with subdivisions and private land holdings. The proposed Mountain States Intertie transmission project considered this corridor and but did not go forward.
- Consider the coal strip mine north of the corridor around MP 22.
- Engage with local government for potential corridor revisions.
- Consider the nearby airstrip; consider airfields and their relationships to these corridors.
- Locate the corridor away from I-90.
- Concern that siting energy projects on private land results in a major loss of agricultural land and interference with adjacent farming as well as impacts on property values, agricultural productivity, local businesses, ranching, fishing, guiding, tourism, farming, geology camps, recreation, hunting, spread of noxious weeds, permanently converting agricultural lands to non-agricultural use, and impacts on irrigation systems and irrigated crop lands, negative electromagnetic effects, adverse visual resource impacts, and fire hazards.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 51-205, specific issues that would be addressed through potential IOP revisions or additions include:

- The Continental Divide NST and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 51-205 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 55-240 Evanston to Granger Corridor

Agency Jurisdictions

Bureau of Land Management
Kemmerer Field Office

Wyoming Counties

Sweetwater County
Uinta County

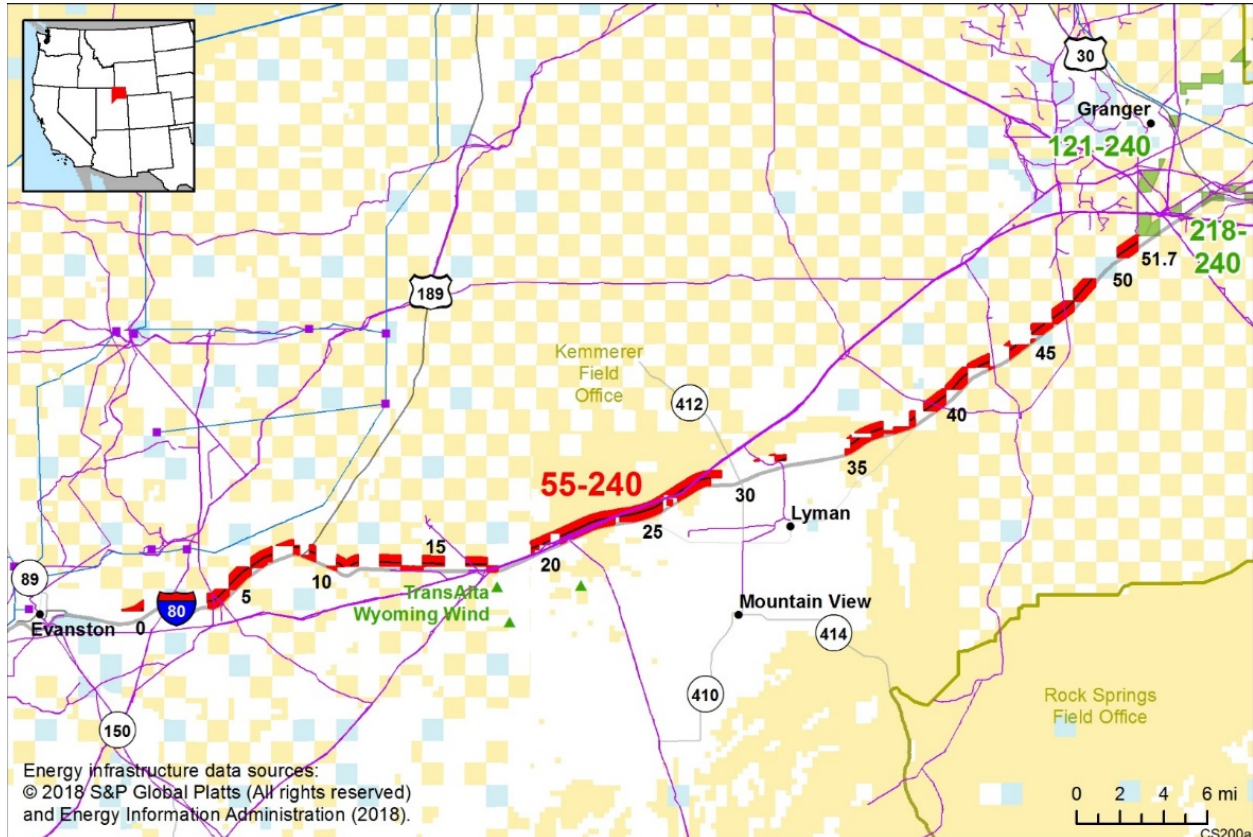


Figure 3.5-32. Corridor 55-240 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Kemmerer RMP (2010)
Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Modifications Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 35 to MP 39, shift the corridor north to avoid California NHT/Oregon NHT/Mormon Pioneer NHT/Pony Express NHT/Four Trails Feasibility Study Trail.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to multiple Section 368 energy corridors to the east, providing a continuous corridor network across southern Wyoming to Cheyenne across BLM-administered lands.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 55-240, specific issues that would be addressed through potential IOP revisions or additions include:

- The California, Oregon, Mormon Pioneer, and Pony Express NHTs and the Four Trails Feasibility Study Trail intersect the corridor. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 55-240 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 73-129 West Wamsutter Corridor

Agency Jurisdictions

Wyoming County

Bureau of Land Management

Sweetwater County

Rawlins Field Office

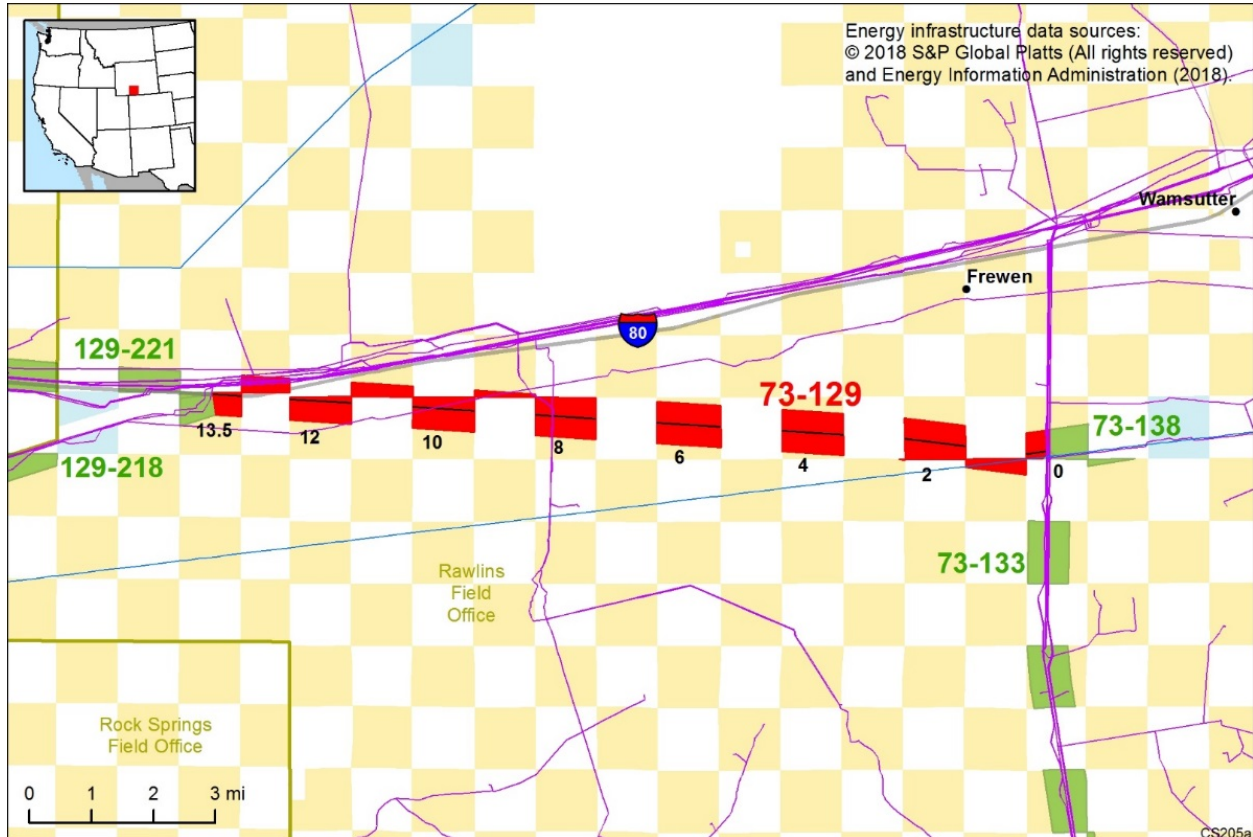


Figure 3.5-33a. Corridor 73-129 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Rawlins RMP (2008)

Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Shift entire corridor along the authorized Gateway West transmission line route (Figure 3.5-33c).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. This short distance corridor in south central Wyoming provides a crucial link between multiple Section 368 energy corridors. The corridor connects Corridors 129-218 and 129-221 to Corridors 73-133 and 73-138. The potential revision is consistent with other potential corridor revisions along the Gateway West route. It creates a preferred route for potential future energy development collocated with planned infrastructure and provides connectivity to renewable energy generation.

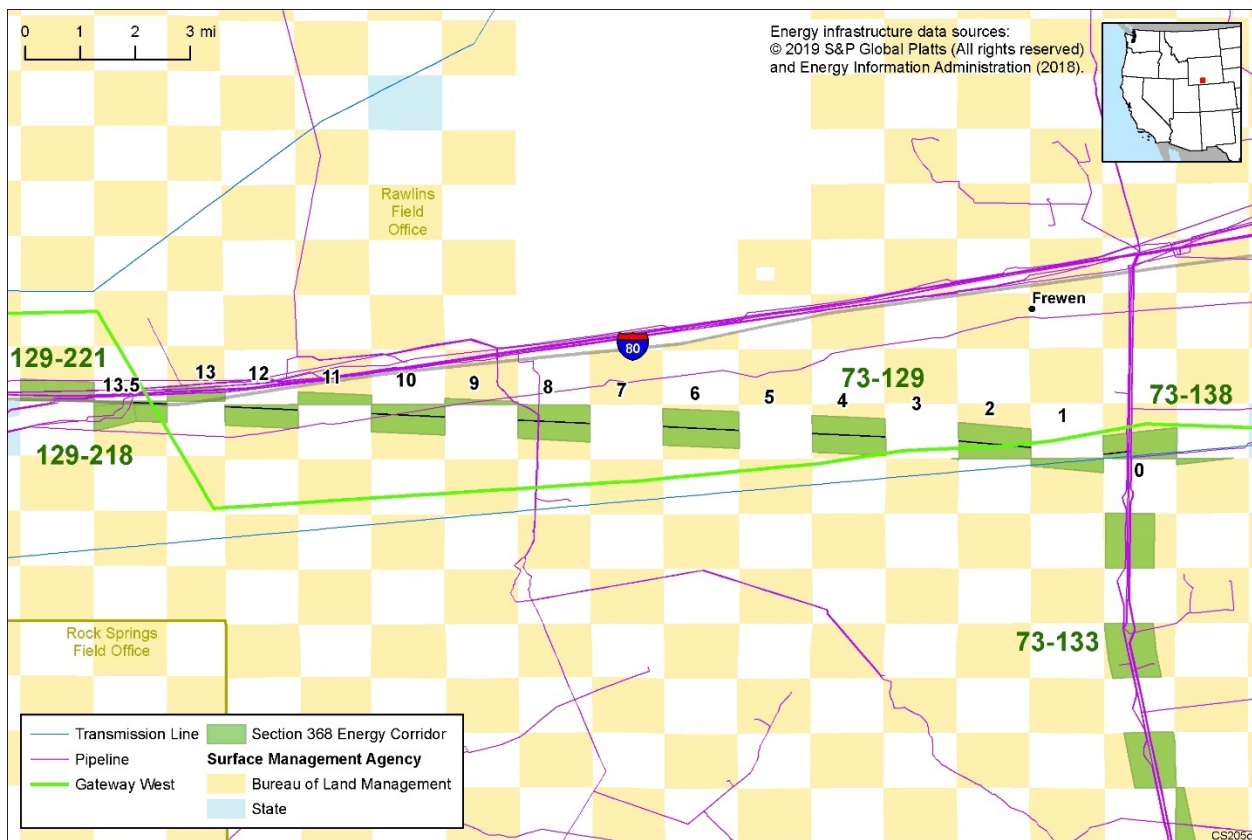


Figure 3.5-33b. Corridor 73-129, as designated

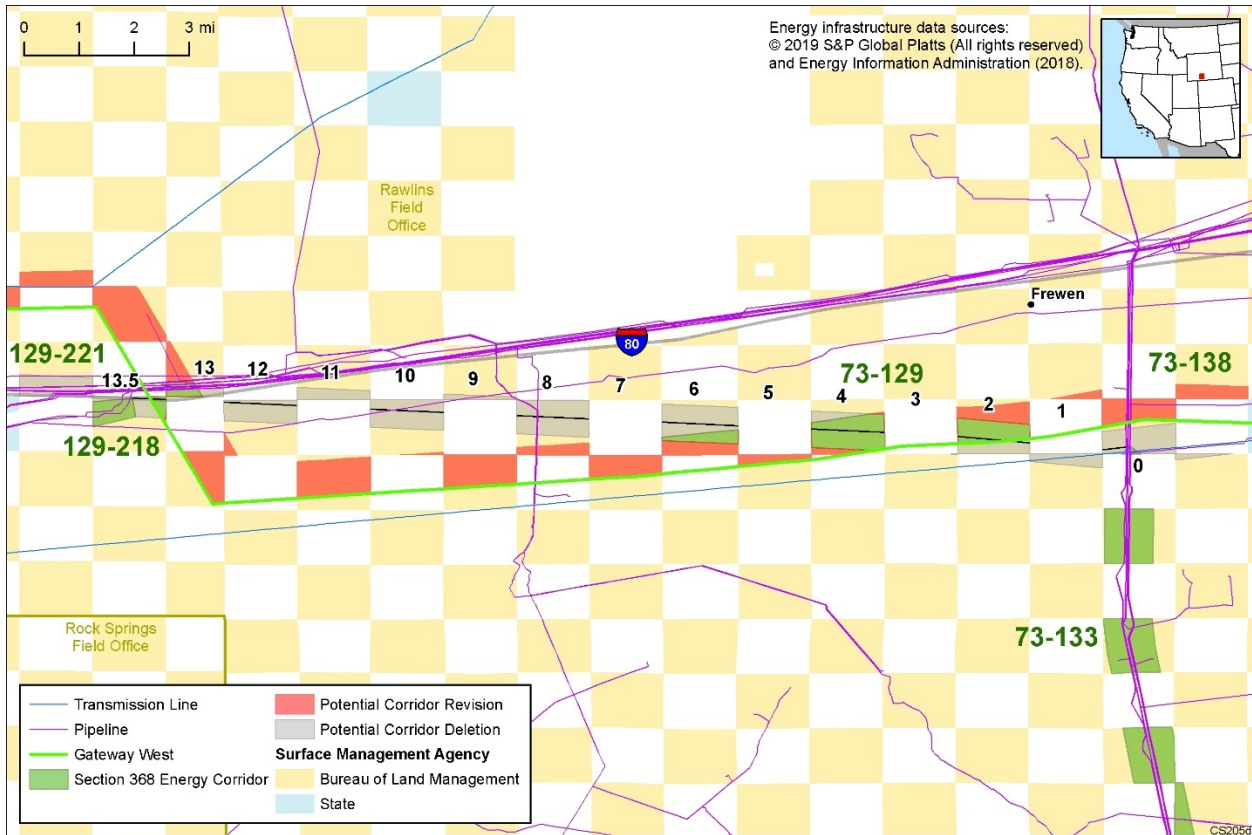


Figure 3.5-33c. Potential Revision to Corridor 73-129

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 73-129, no potential IOP revisions or additions have been identified.

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 72-129 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 73-133 Wamsutter to Maybell Corridor

Agency Jurisdictions

Wyoming County

Bureau of Land Management
Rawlins Field Office

Sweetwater County

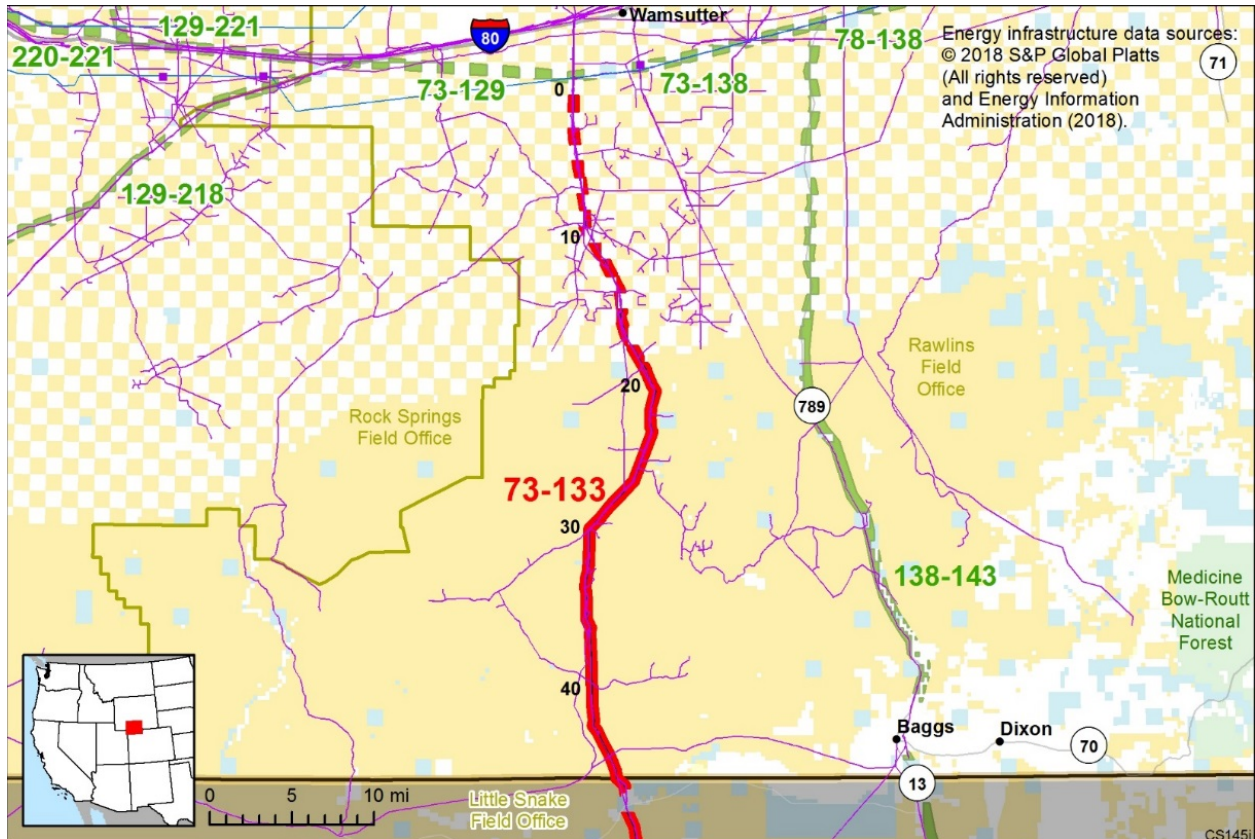


Figure 3.5-34. Corridor 73-133 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Rawlins RMP (2008)
Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.
Designated use: underground only.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

At the time of the review, the existing corridor location is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by connecting multiple Section 368 energy corridors on both the north and south ends, creating an underground interstate pathway from Wyoming to Colorado. There are two corridors (Corridor 73-133 and Corridor 138-143) that run north-south in this area, providing connectivity between Wyoming and Colorado. Corridor 73-133 is underground only to allow for future pipeline development. The Agencies could consider upgrading the 3,500-ft Wamsutter-Powder Rim locally designated utility corridor along the authorized TransWest Express route (west of Corridor 73-133) to a Section 368 energy corridor. The corridor could be designated as electric-only to allow for future electrical transmission (see *Summary for the Wamsutter-Powder Rim Corridor Addition*).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 73-133, specific issues that would be addressed through potential IOP revisions or additions include:

- The Four Trails Feasibility Study Trail and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 73-133 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 73-138 East Wamsutter Corridor

Agency Jurisdictions

Bureau of Land Management
Rawlins Field Office

Wyoming Counties

Carbon County
Sweetwater County

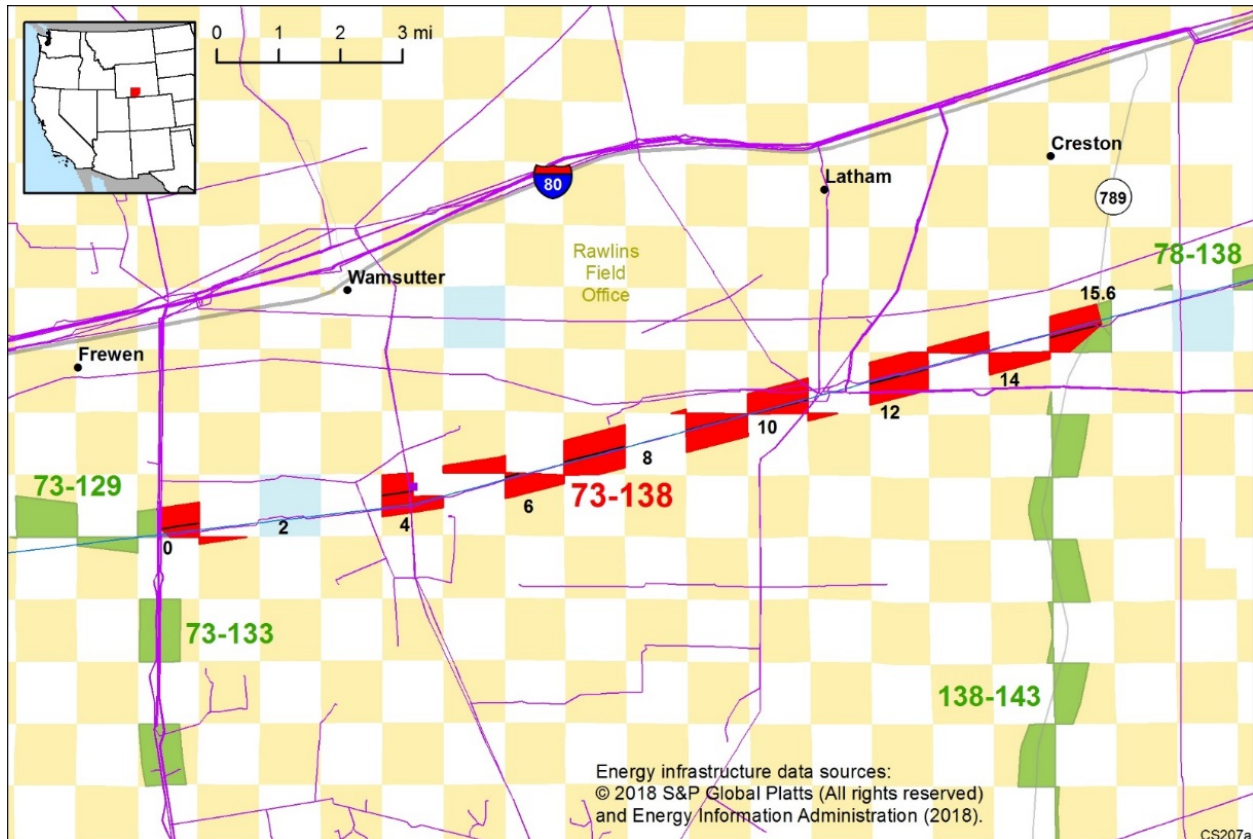


Figure 3.5-35a. Corridor 73-138 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Rawlins RMP (2008)

TransWest Express Transmission Project and Resource Management Plan Amendments ROD (2016)

Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Shift entire corridor along the authorized Gateway West transmission line route (figure 3.5-35c).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. This short distance corridor in south central Wyoming provides a crucial link between multiple Section 368 energy corridors (Corridors 78-138 and 138-143 to Corridors 73-133 and 73-129). The potential revision is consistent with other potential corridor revisions along the Gateway West route. It creates a preferred route for potential future energy development collocated with planned infrastructure and provides connectivity to renewable energy generation.

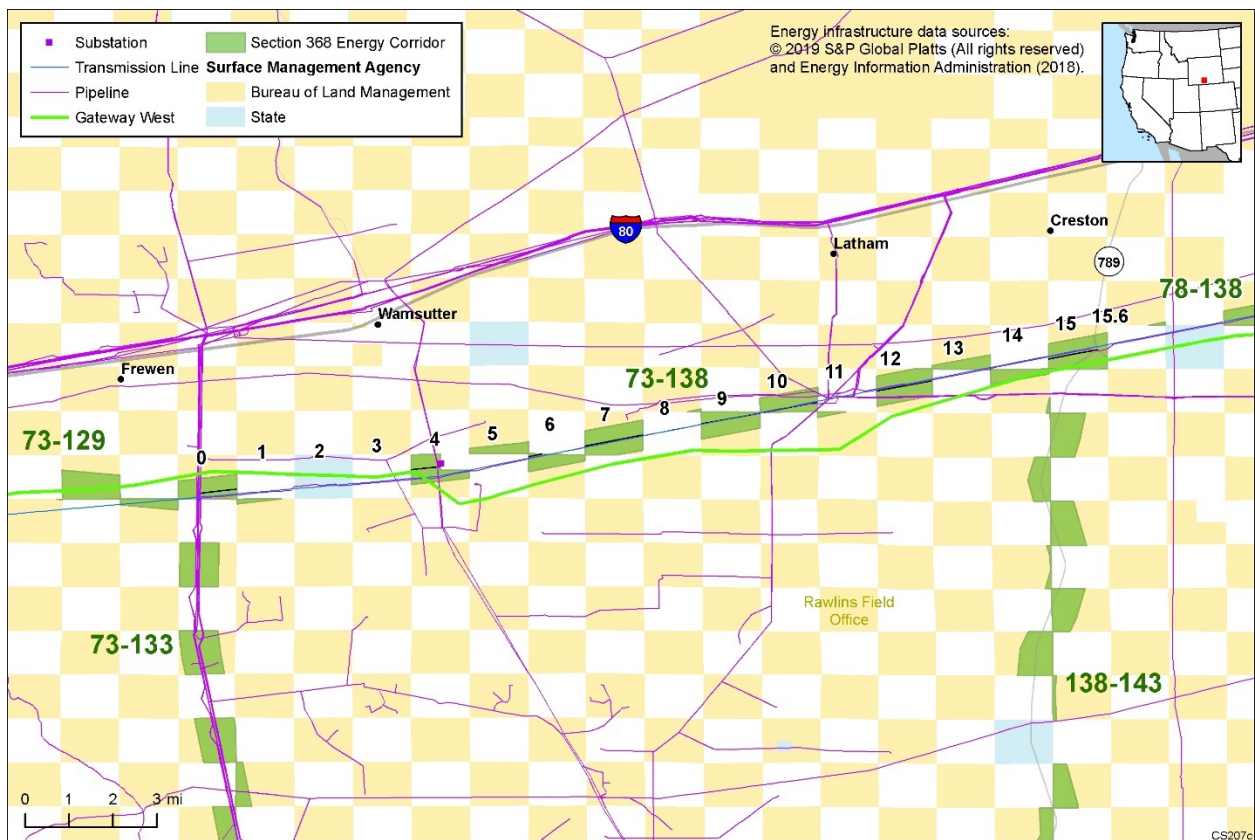


Figure 3.5-35b. Corridor 73-138, as designated

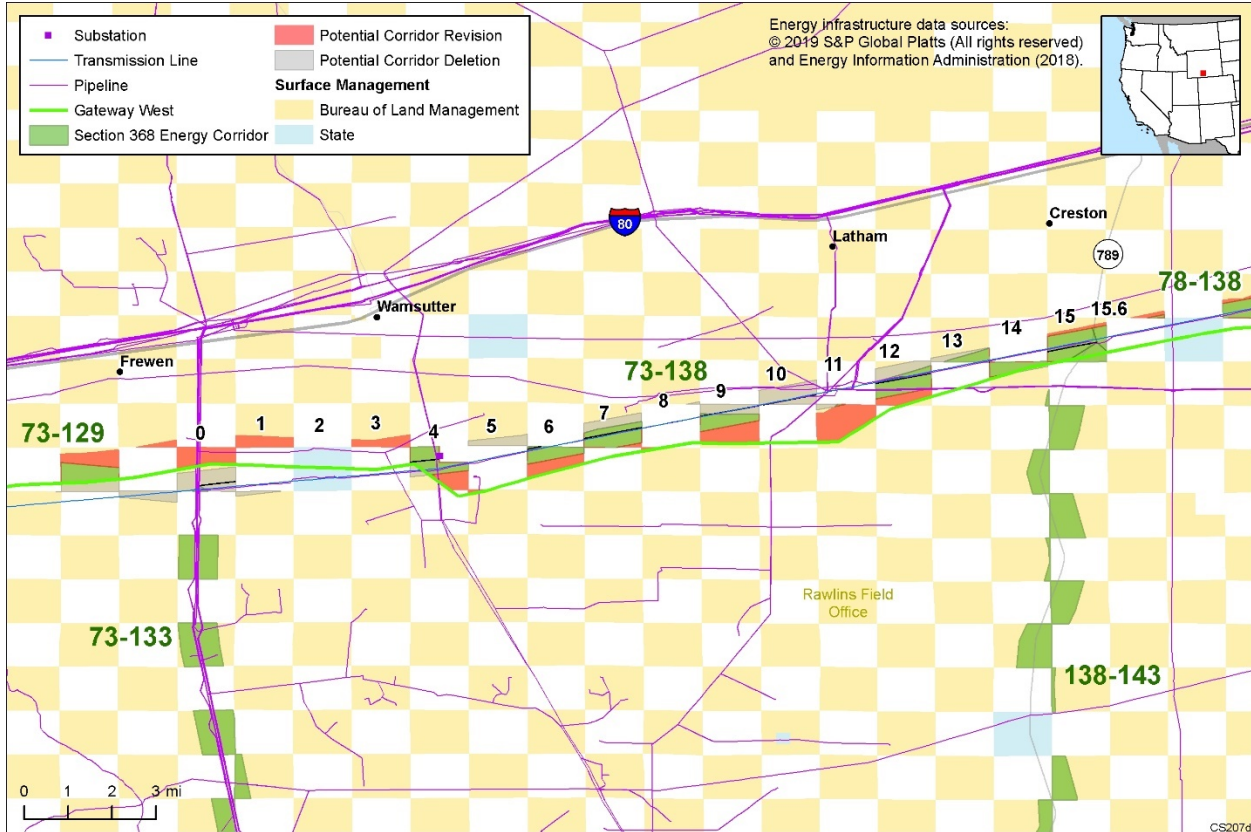


Figure 3.5-35c. Potential Revision to Corridor 73-138

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 73-138, no potential IOP revisions or additions have been identified.

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 73-138 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 78-85 Laramie Corridor

Agency Jurisdictions

Bureau of Land Management
Rawlins Field Office

Wyoming Counties

Albany County
Carbon County

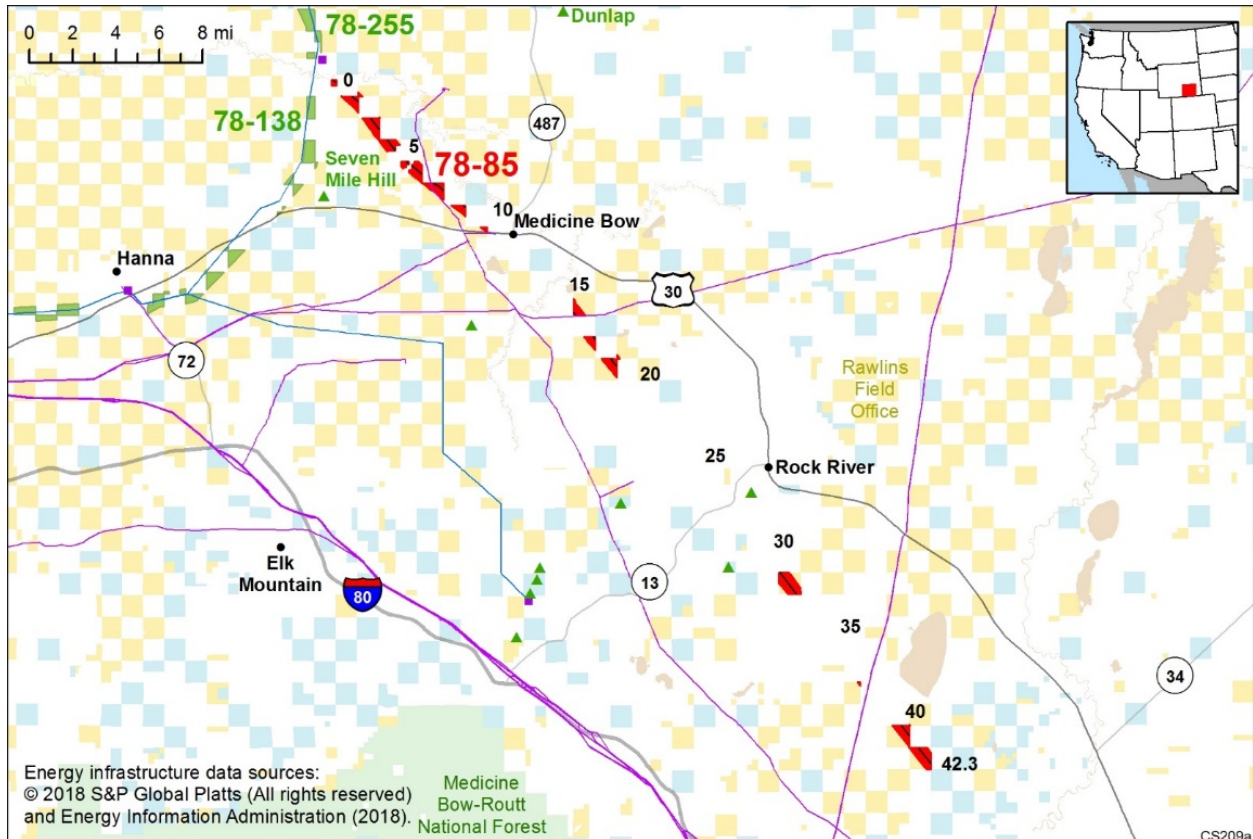


Figure 3.5-36. Corridor 78-85 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Rawlins RMP (2008)
Wyoming GRSG ARMPA (BLM 2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor provides a north-south pathway for energy transport in Wyoming. There are limited federal lands, but the corridor connects multiple Section 368 energy corridors to the north, creating a continuous corridor network in southeastern Wyoming across BLM-administered lands collocated with an existing transmission line.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 78-85, specific issues that would be addressed through potential IOP revisions or additions include:

- MTR-IR and the corridor intersect. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 78-85 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 78-138 Rawlins Corridor

Agency Jurisdictions

Bureau of Land Management
Rawlins Field Office

Wyoming Counties

Carbon County
Sweetwater County

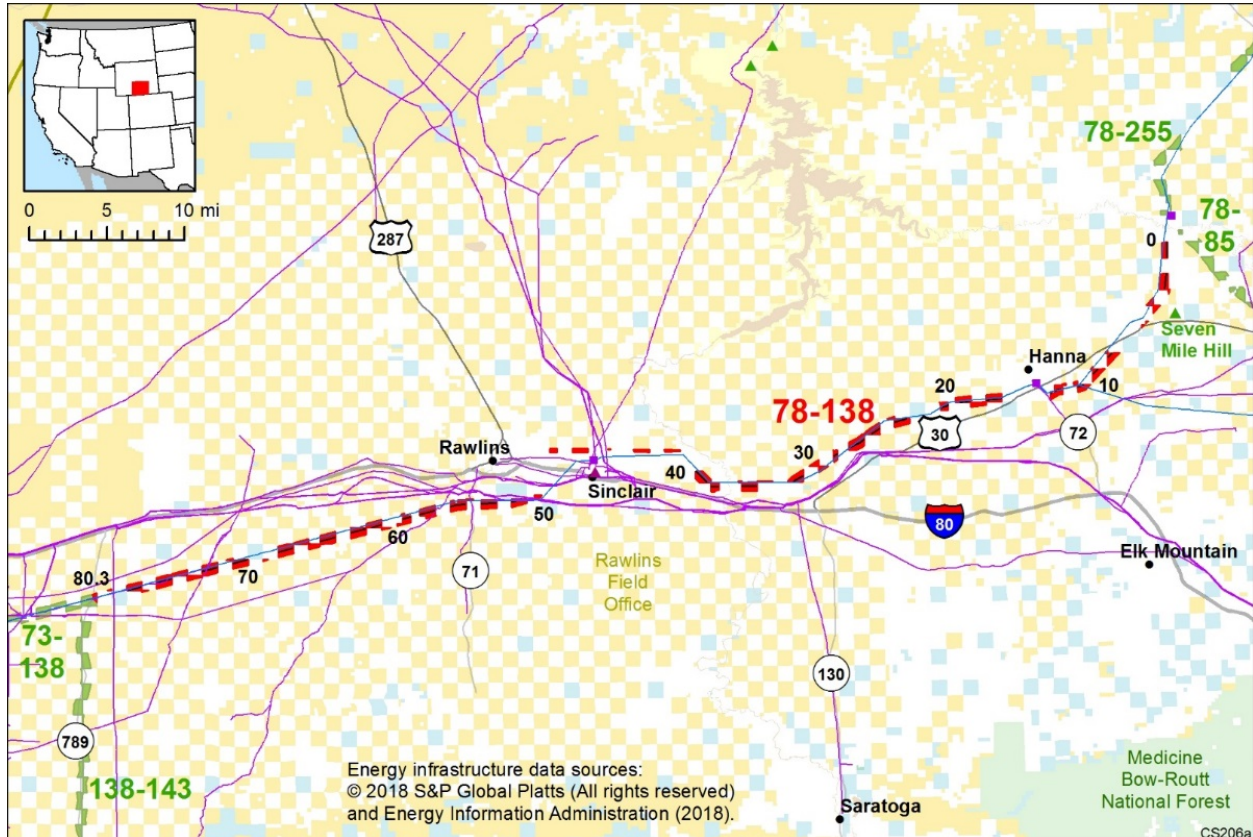


Figure 3.5-37a. Corridor 78-138 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Rawlins RMP (2008)
TransWest Express Transmission Project and RMP Amendments ROD (2016)
WY GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Shift entire corridor along the authorized Gateway West transmission line route (figure 3.5-37c).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor connects multiple corridors to the east and west, creating a continuous east-west corridor network through southern Wyoming across BLM-administered lands. The potential revision is consistent with other corridor revisions along the Gateway West route. It creates a preferred route for potential future energy development collocated with planned infrastructure and provides connectivity to renewable energy generation. GRSG PHMA (ROW avoidance area) and the corridor intersect and are not compatible with the corridor’s purpose as a preferred location for infrastructure. However, the corridor would be collocated with Gateway West in the GRSG PHMA.

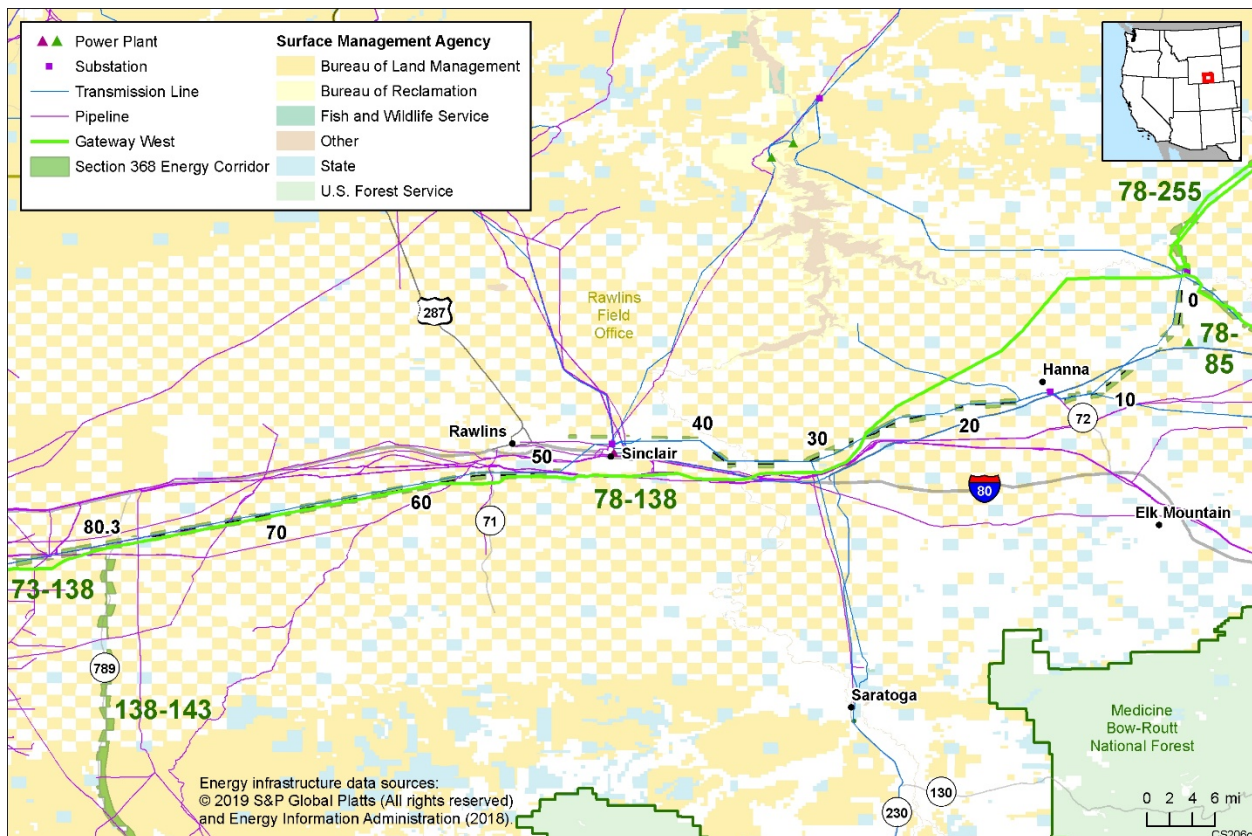


Figure 3.5-37b. Corridor 78-138, as designated

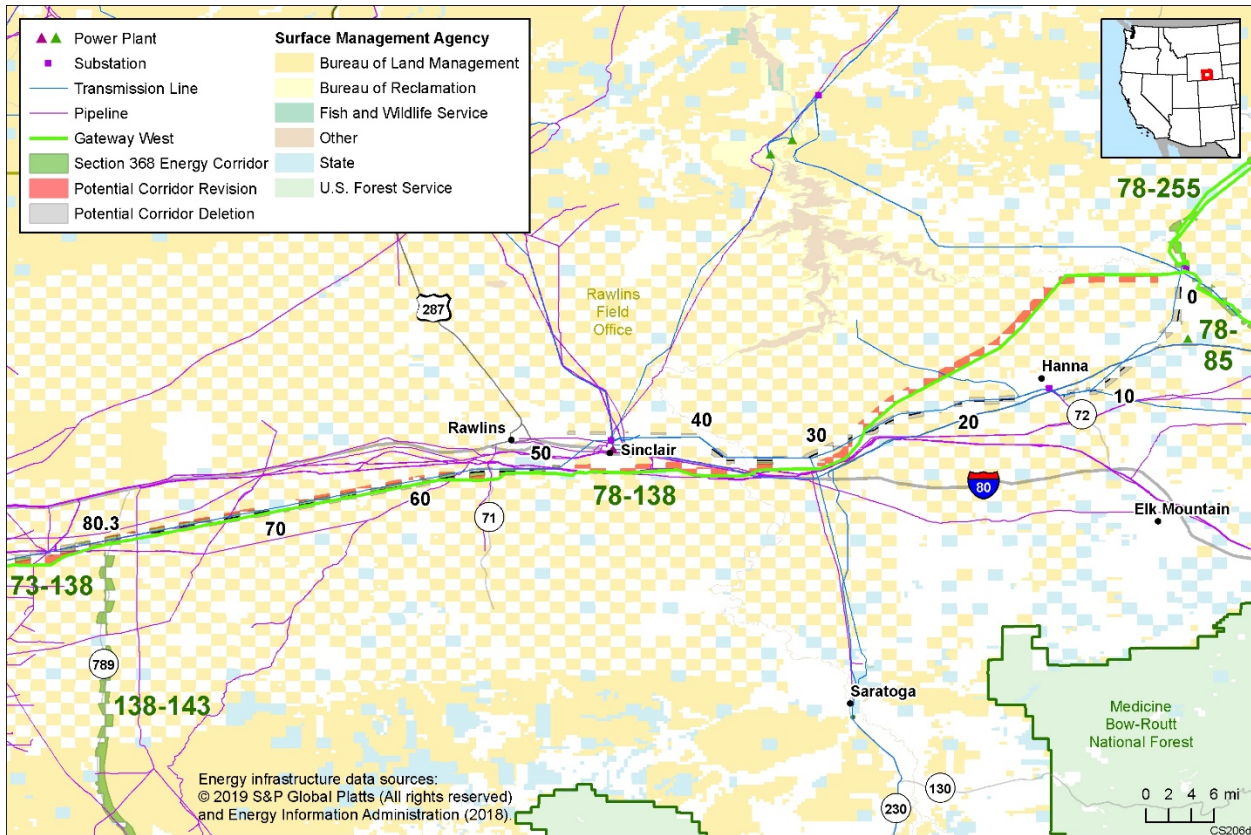


Figure 3.5-37c. Potential Revision to Corridor 78-138

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 78-138, specific issues that would be addressed through potential IOP revisions or additions include:

- The Four Trails Feasibility Study Trail and the Continental Divide NST SRMA intersect the corridor. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 78-138 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 78-255 Shirley Basin Corridor

Agency Jurisdictions

Bureau of Land Management

Casper Field Office
Rawlins Field Office

Forest Service

Medicine Bow-Routt National Forest

Wyoming Counties

Carbon County
Natrona County

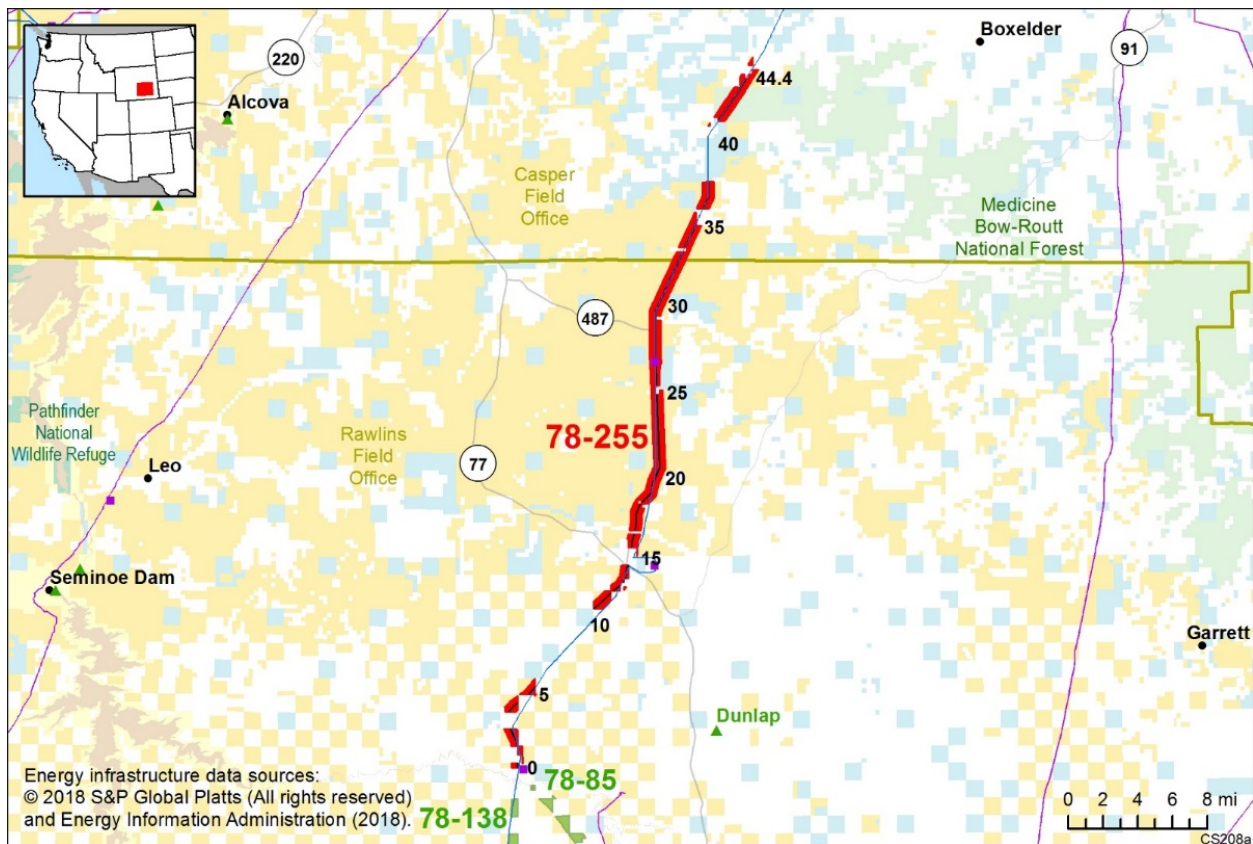


Figure 3.5-38. Corridor 78-255 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Casper RMP (2007)

Rawlins RMP (2008)

Medicine Bow National Forest LMP (2003)

Wyoming GRSG ARMPA (2019)

Forest Service GRSG ROD for Northwest Colorado and Wyoming and LMPAs for the Routt National Forest, Thunder Basin National Grassland, Bridger-Teton National Forest, and Medicine Bow National Forest (2015)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

At the time of the review, the existing corridor location is considered to be the best balance in meeting the siting principles. The corridor provides a north-south pathway for energy transport in southeastern Wyoming and connects to Corridors 78-138 and 78-85 to the south, creating a continuous corridor network that extends to the northeast across BLM- and USFS-administered lands. The corridor provides an important connection to wind energy transmission. The corridor was identified as a corridor of concern in the Settlement Agreement for GRSG core area and habitat. GRSG PHMA (ROW avoidance areas) are not compatible with the corridor's purpose as a preferred location for infrastructure. However, the corridor is collocated with an existing 230-kV transmission line and follows the recently authorized 500-kV Gateway West transmission line for its entire length.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Need mitigation measures to minimize impacts on GRSG impacts (e.g., raptor perching deterrents on transmission lines).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 78-255, specific issues that would be addressed through potential IOP revisions or additions include:

- Lands with wilderness characteristics have been identified within the corridor area. Agencies could consider an IOP to provide guidance on the review process for applications within corridors with incomplete inventories. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 78-255 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 79-216 Casper to Billings Corridor

Agency Jurisdictions

Bureau of Land Management

Billings Field Office
 Casper Field Office
 Cody Field Office
 Lander Field Office
 Worland Field office

Montana County

Carbon County

Wyoming Counties

Big Horn County
 Converse County
 Fremont County
 Hot Springs County
 Natrona County
 Washakie County

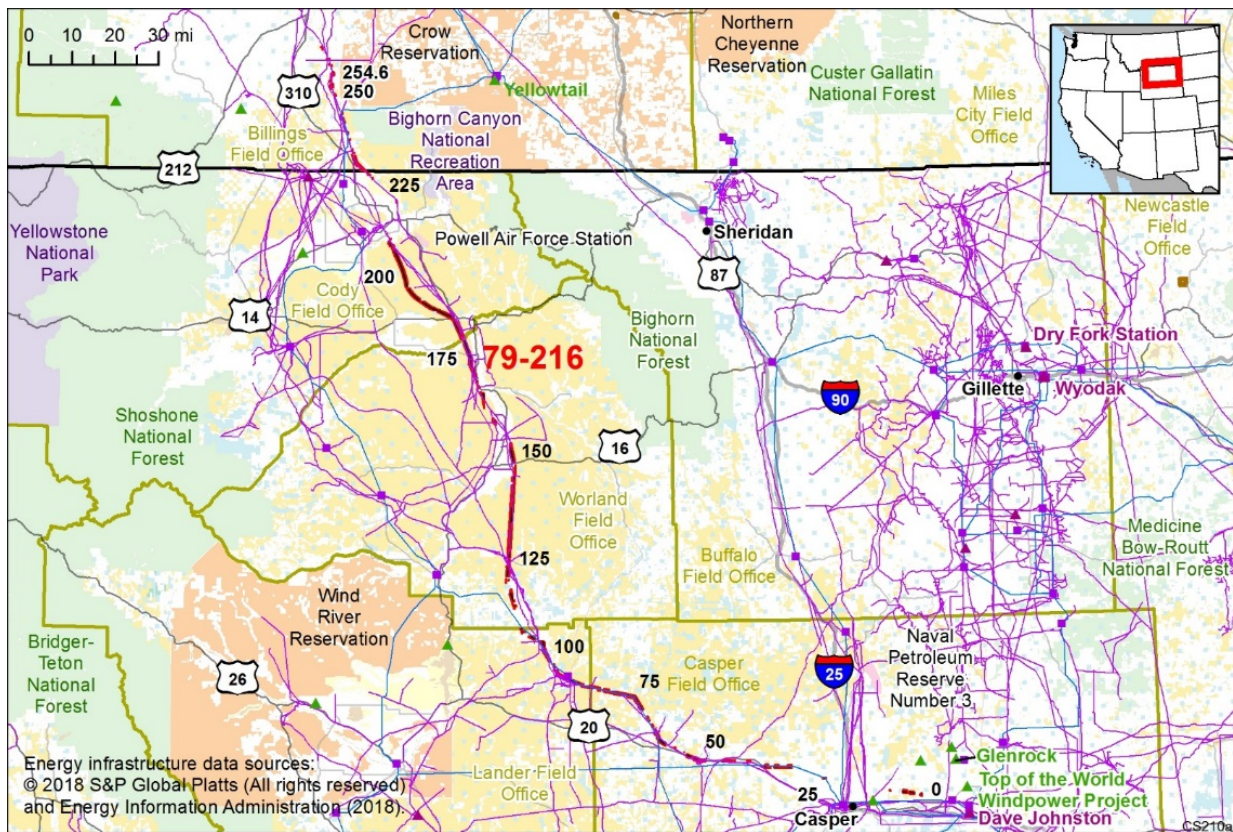


Figure 3.5-39a. Corridor 79-216 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Billings GRSG ARMPA (2019)
 Casper RMP (2007)
 Humboldt National Forest LRMP (1986)
 NVCA GRSG RMPA (BLM 2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).

Shift the corridor along existing infrastructure in areas where it is not currently collocated (MP 103 to MP 125, MP 158 to MP 170, and MP 185 to MP 209; Figures 3.5-39d through 39i).

- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

Consider changing the VRM class where the corridor intersects VRM Class II areas (MP 101 to MP 108).

- Delete corridor from MP 0 to MP 32 because there is very little federal land (Figure 3.5-39c).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing north-south connectivity for interstate energy transport from Casper, Wyoming to Billings, Montana. The corridor was identified as a corridor of concern in the Settlement Agreement for GRSG core area and habitat. GRSG GHMA and PHMA (ROW avoidance areas) are not compatible with the corridor's purpose as a preferred location for infrastructure. However, GRSG PHMA and GHMA encompass the entire area and cannot be avoided, and the corridor (with above changes) is collocated with existing infrastructure (minimizing impacts).

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Elk migration corridors and habitat, lands with wilderness characteristics, NHT, cultural properties, landscape characteristics, ACECs, and other resource concerns.
- Concern that there is no demand for a north-south corridor in the area.

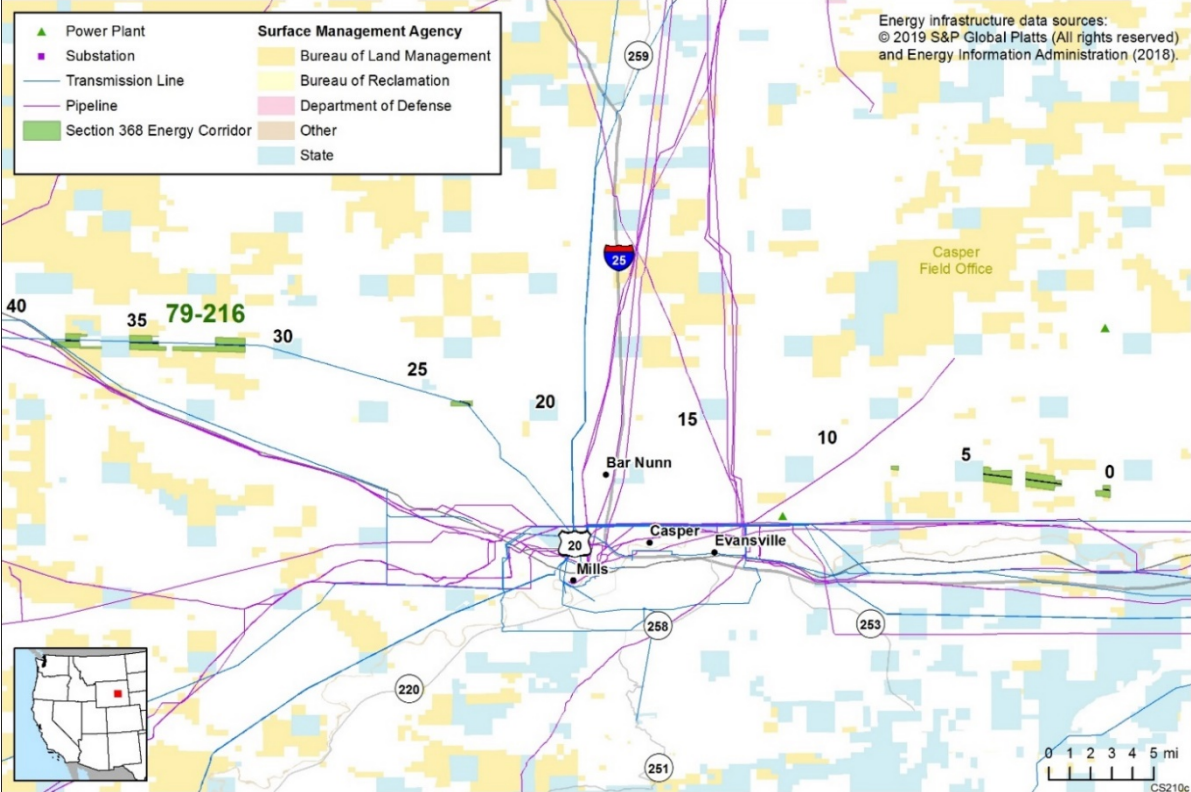


Figure 3.5-39b. Corridor 79-216, as designated (MP 0 to MP 32)

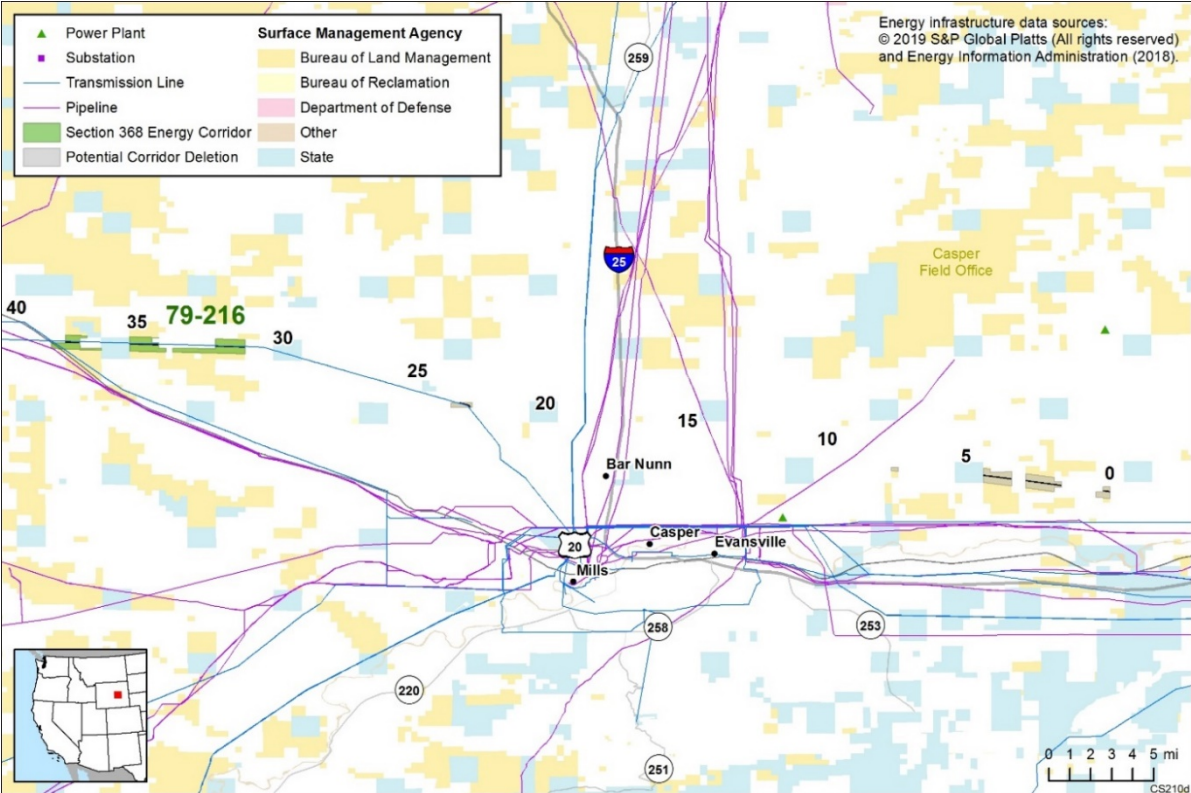


Figure 3.5-39c. Potential Revision to Corridor 79-216 (MP 0 to MP 32)

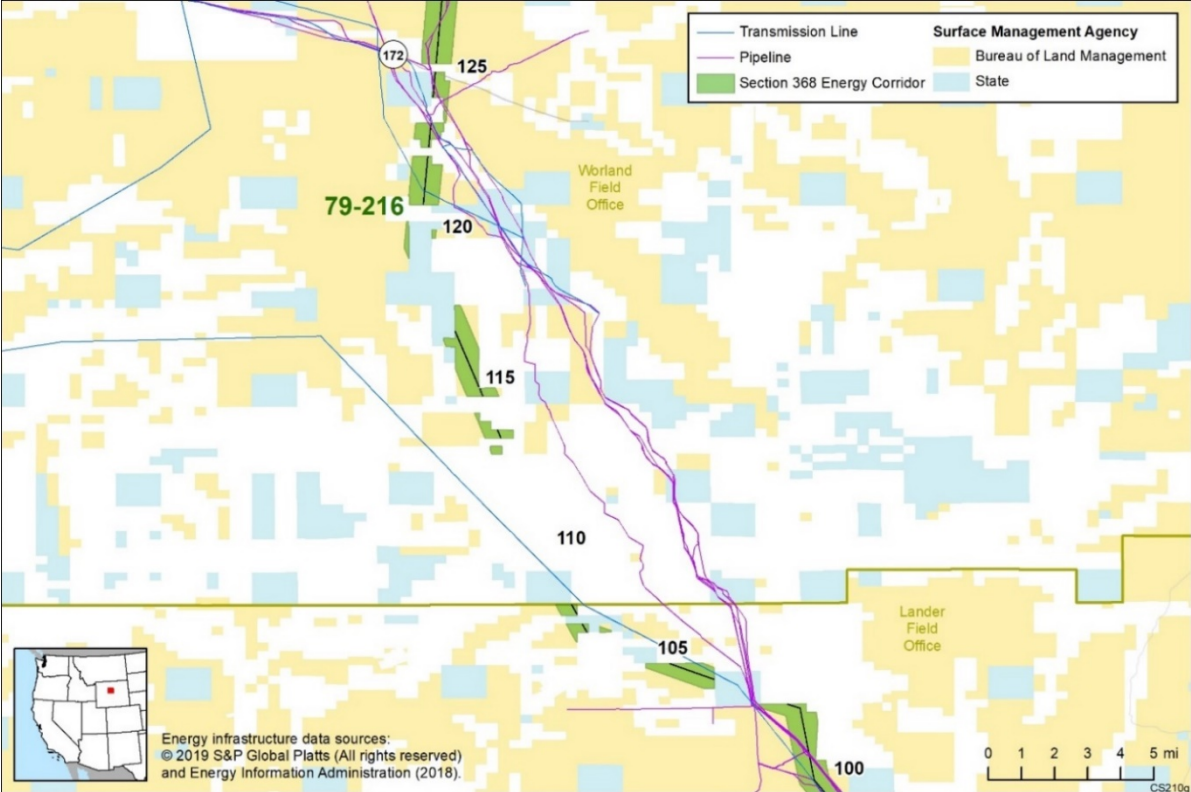


Figure 3.5-39d. Corridor 79-216, as designated (MP 103 to MP 125)

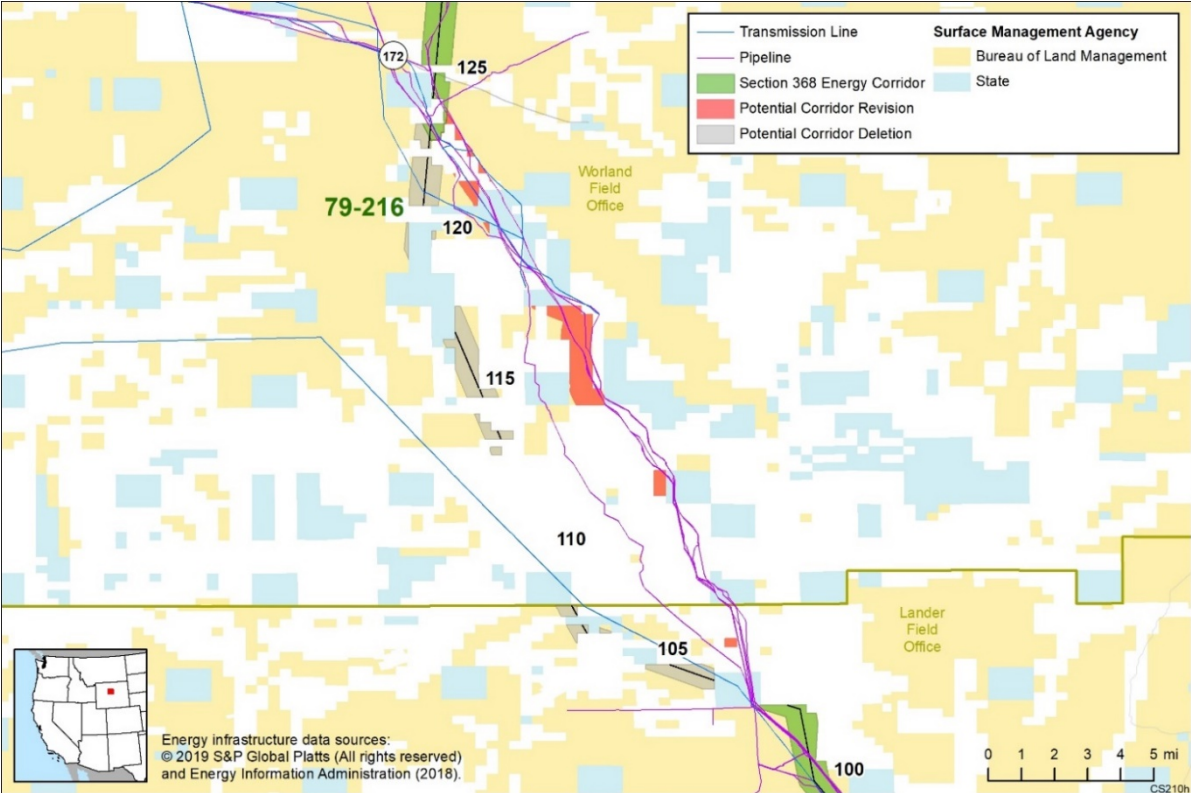


Figure 3.5-39e. Potential Revision to Corridor 79-216 (MP 103 to MP 125)

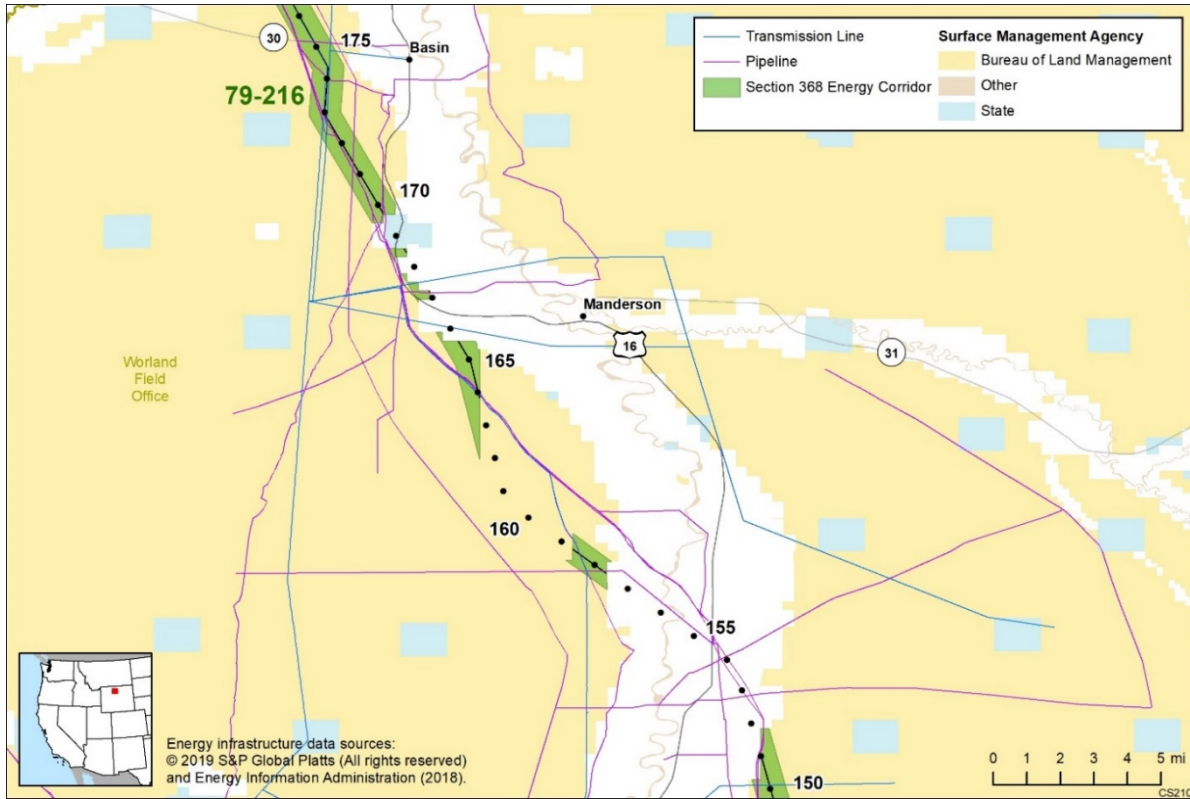


Figure 3.5-39f. Corridor 79-216, as designated (MP 158 to MP 170)

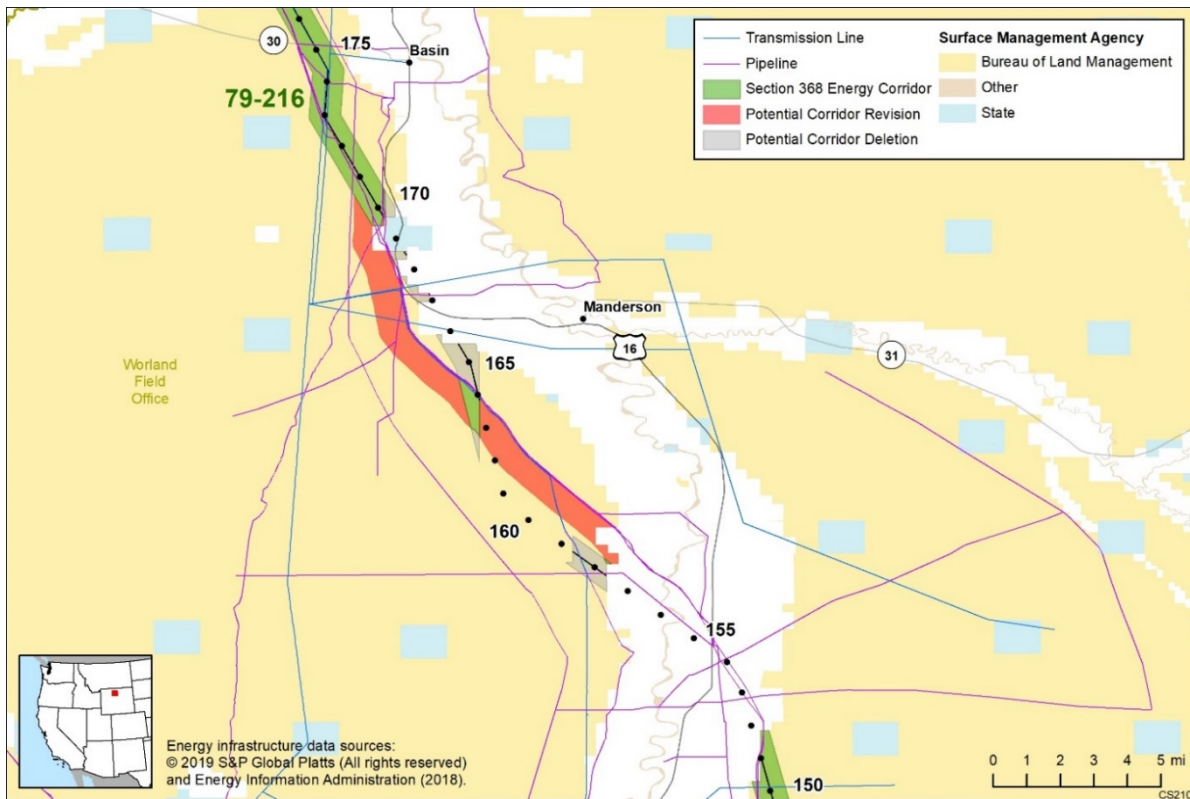


Figure 3.5-39g. Potential Revision to Corridor 79-216 (MP 158 to MP 170)

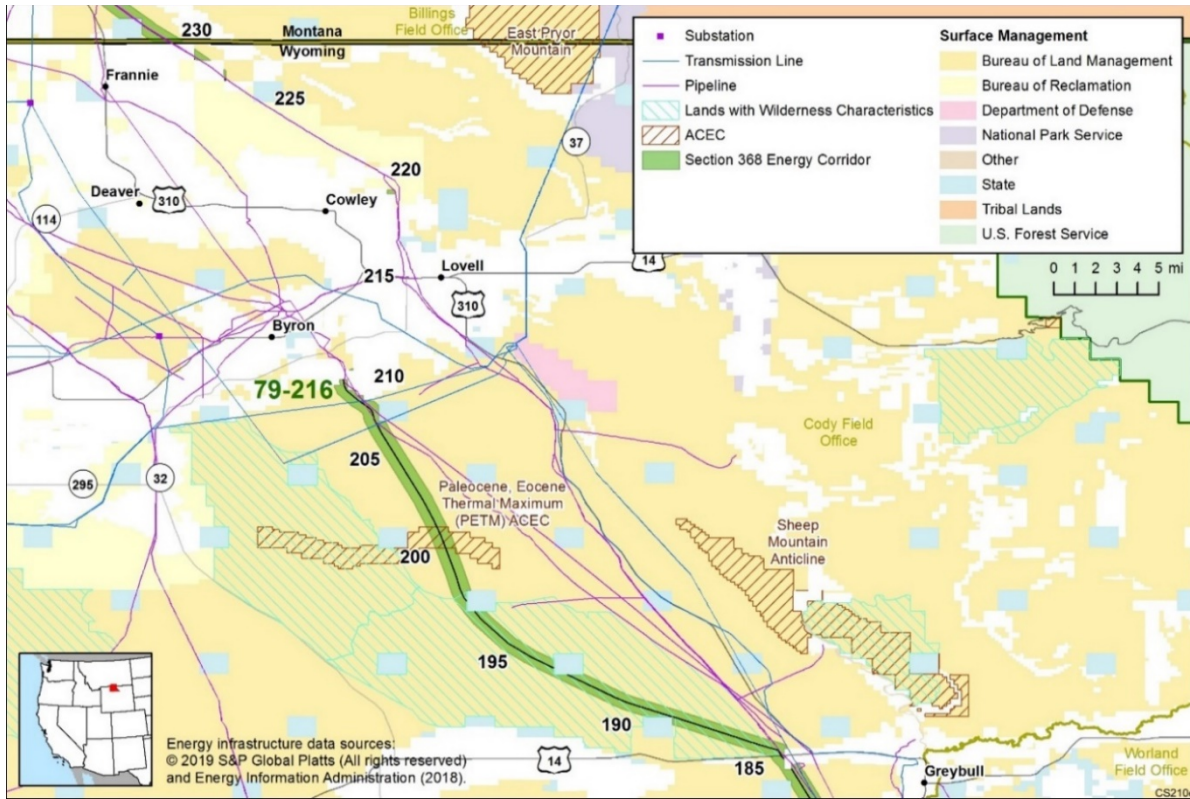


Figure 3.5-39h. Corridor 79-216, as designated (MP 185 to MP 209)

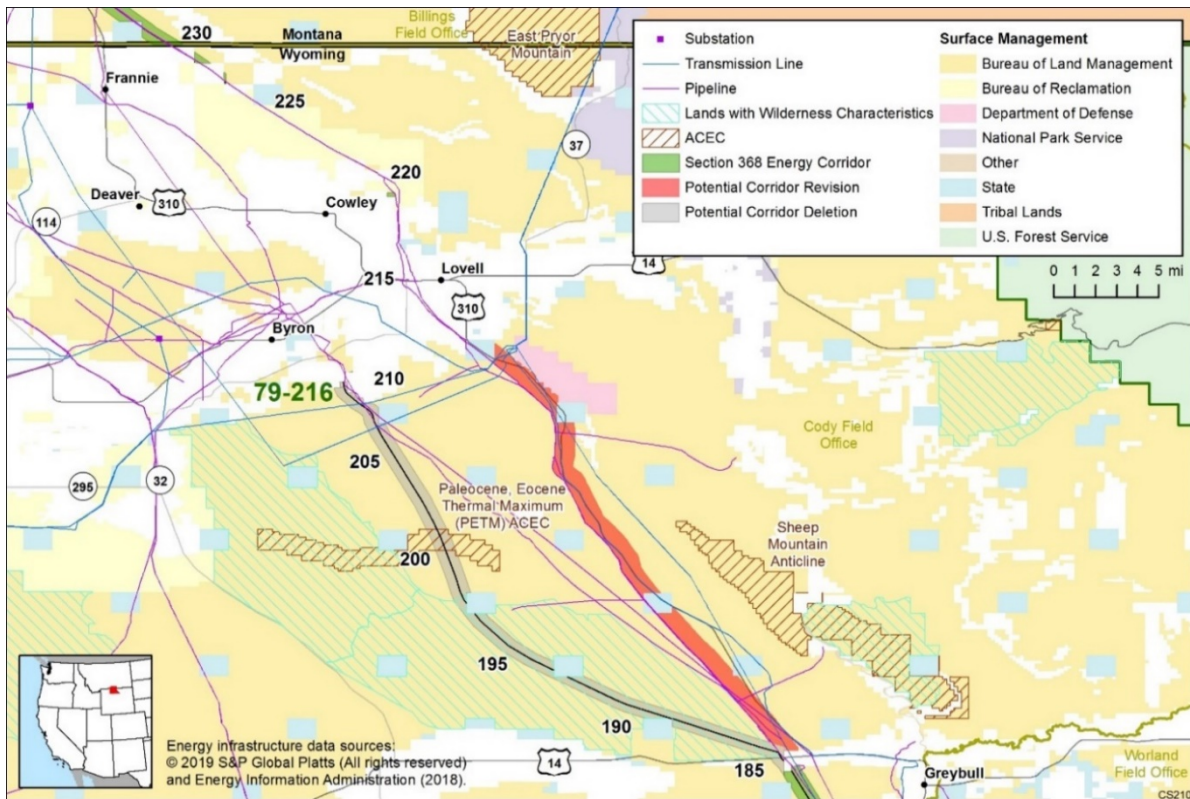


Figure 3.5-39i. Potential Revision to Corridor 79-216 (MP 185 to MP 209)

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 79-216, specific issues that would be addressed through potential IOP revisions or additions include:

- Lands with undetermined status for wilderness characteristics intersect and are adjacent to the corridor. Agencies could consider an IOP to provide guidance on the review process for applications within corridors with incomplete inventories. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.
- MTR-IR and the corridor intersect. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies considering a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 79-216 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 101-263 Eureka to Redding Corridor

Agency Jurisdictions

Bureau of Land Management

Redding Field Office

Forest Service

Shasta-Trinity National Forest

Six Rivers National Forest

California Counties

Humboldt County

Shasta County

Trinity County

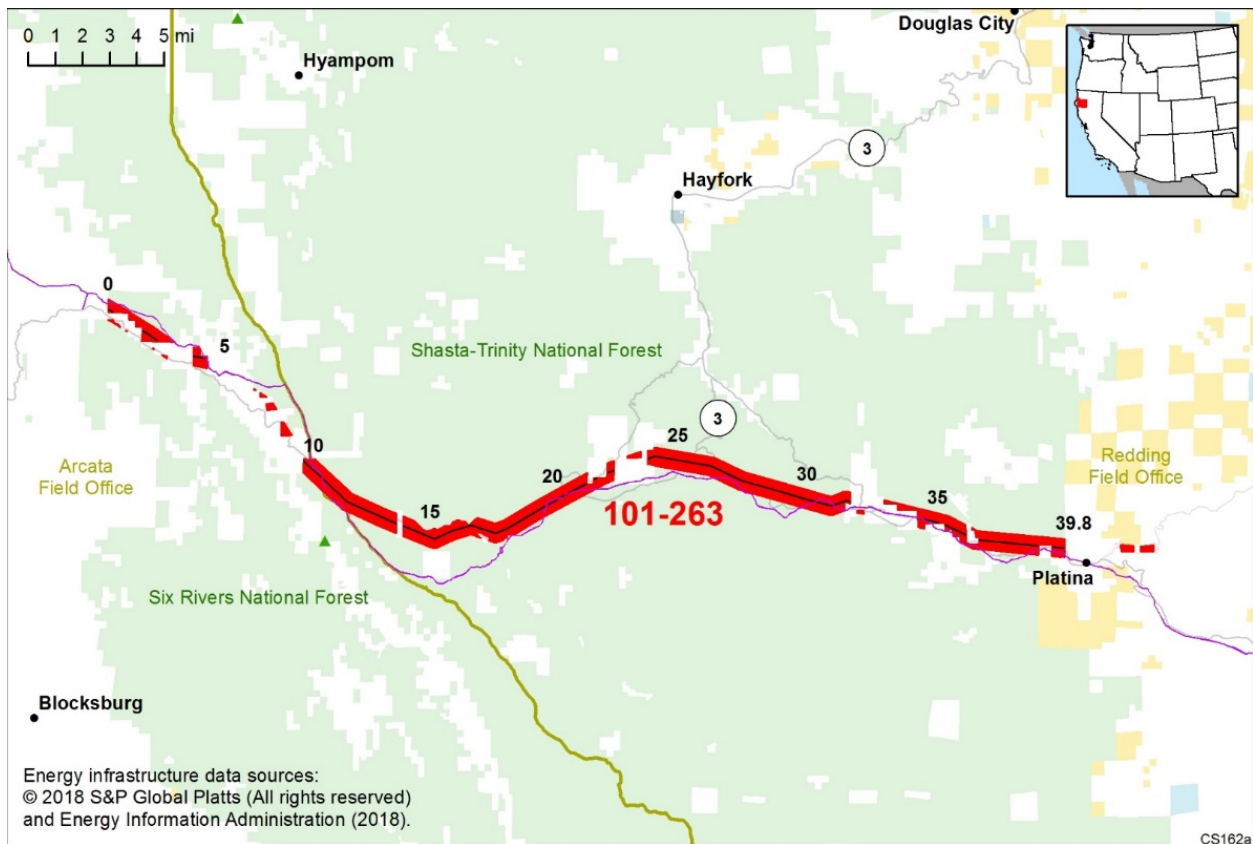


Figure 3.5-40. Corridor 101-263 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Redding RMP (1993)

Shasta-Trinity National Forest LMP (1995)

Six Rivers National Forest LMP (1995)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 14 to MP 18, shift the corridor to the south so that the existing transmission line is the northern border rather than the centerline to minimize impacts on the Trinity, California National WSR.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing an east-west pathway for energy transport in Northwestern California. The potential minor revisions would minimize impacts on the Trinity, California National WSR to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 115-kV transmission line).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 101-263, specific issues that would be addressed through potential IOP revisions or additions include:

- The South Fork Roadless Area and the corridor are adjacent. The addition of an agency coordination IOP related to Roadless Areas could help in minimizing conflicts with the Roadless Rule.
- Lands with wilderness characteristics are located in the area of the corridor. Agencies could consider an IOP to provide guidance on the review process for applications within corridors with incomplete inventories. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.
- MTR-VR and Slow-speed Route intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 101-263 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 102-105 Seattle-Wenatchee Corridor

Agency Jurisdictions

Bureau of Land Management

Wenatchee Field Office

Forest Service

Mt. Baker-Snoqualmie National Forest

Okanogan-Wenatchee National Forest

Washington Counties

Chelan County

King County

Snohomish County

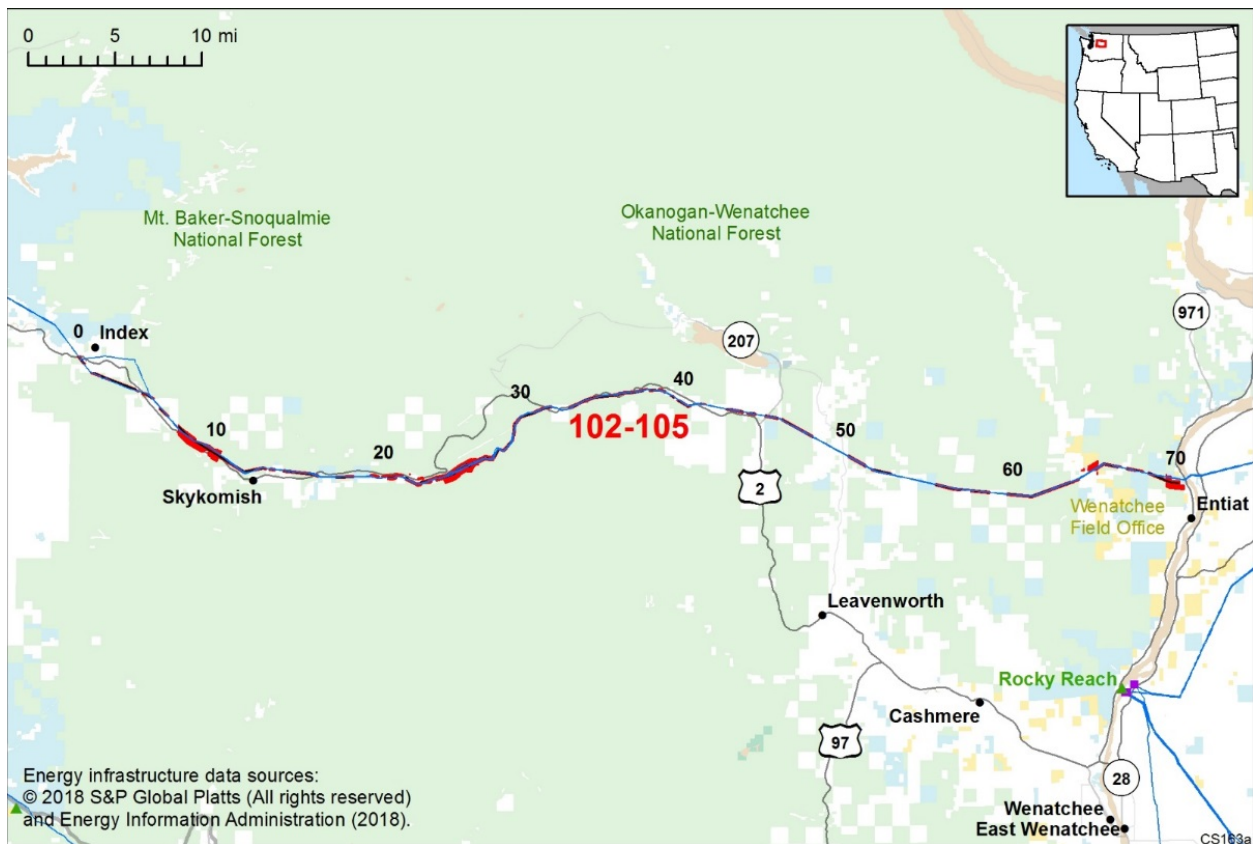


Figure 3.5-41. Corridor 102-105 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Spokane RMP/EIS (1985)

Mt. Baker-Snoqualmie National Forest LMP (1990)

Wenatchee National Forest LMP (1990)

Corridor width: 3,500 ft on BLM-administered lands, 500 ft and variable on USFS-administered lands.

Designated use: multi-modal for electric transmission and pipelines on BLM-administered lands, electric upgrade only on USFS-administered lands.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by creating an east-west pathway for transmitting generated energy from eastern Washington to the Puget Sound metropolitan area. The corridor is mostly on USFS land where it is designated electric upgrade only. One side of the existing BPA 500-kV transmission line has capacity for upgrades on the line within the corridor, although there have been no new proposals or applications for energy infrastructure in the area. Pipeline development within the corridor would be challenging because of resource concerns, soils and landslide hazards, and terrain, therefore, the Agencies do not recommend widening the corridor or changing the corridor's mode from electric upgrade only.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Concern about critical habitat for species (Marbled Murrelet, Chinook Salmon, Bull Trout, and Northern Spotted Owl).
- Concern about Stevens Pass Historic District (north of MP 26). The forest hides existing transmission line well, but viewshed could be a concern if transmission lines are added in the future.
- Concern about potential visual impacts on Stevens Pass Scenic Byway.
- Concern about riparian reserves/Aquatic Conservation strategy (stream buffers).
- Concern about Wilderness.
- Avoid or minimize impacts on old growth forests for new ROWs.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 102-105, specific issues that would be addressed through potential IOP revisions or additions include:

- The Eagle Rock Roadless Area and the Alpine Lakes Adj. Roadless Area are adjacent to the corridor. Agencies could consider a coordination IOP related to Roadless Areas to help minimize conflicts with the Roadless Rule.
- The Pacific Crest NST and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- MTR-VR and the corridor intersect. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 102-105 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 111-226 Nevada-Idaho Connector Corridor

Agency Jurisdictions

Idaho County

Bureau of Land Management
Burley Field Office

Twin Falls County

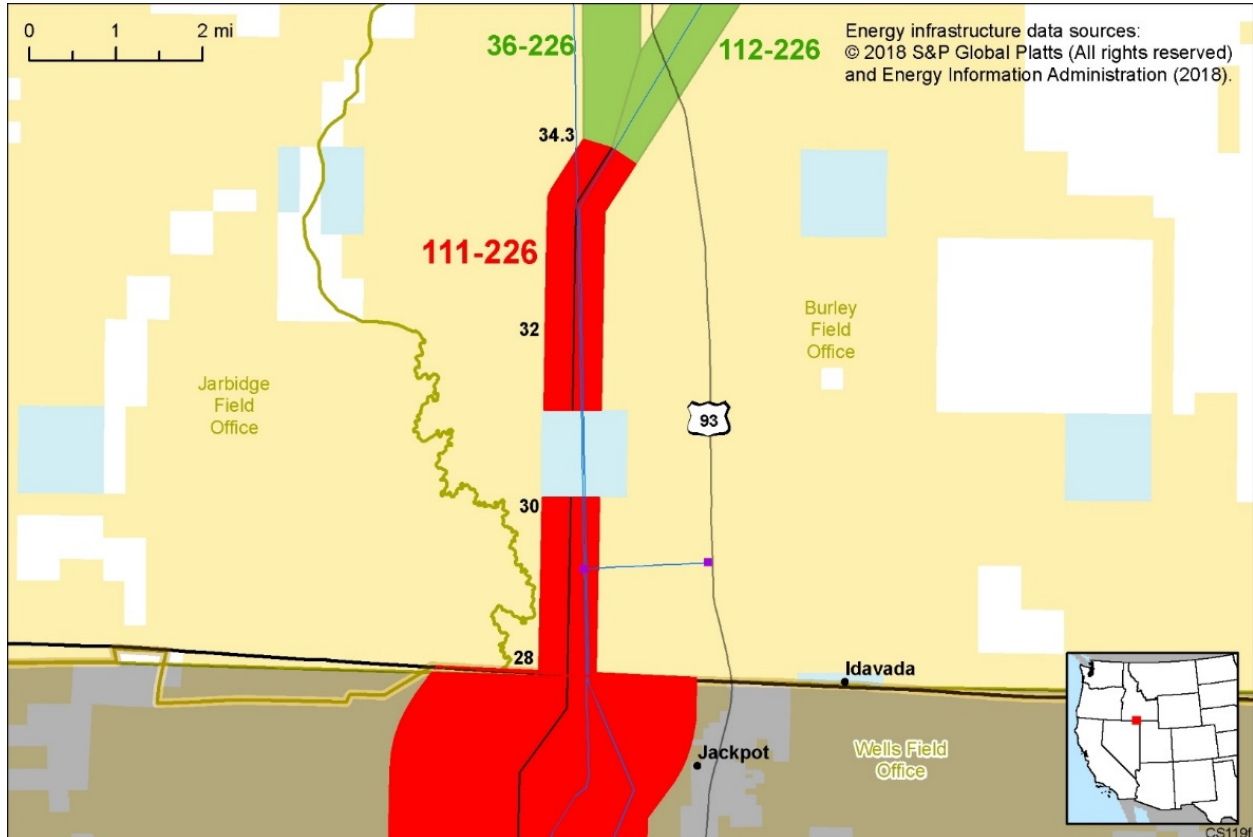


Figure 3.5-42. Corridor 111-226 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Twin Falls MFP (1982)
IDMT GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 28 to MP 30, shift the corridor east, with the existing transmission line as western border of corridor, to avoid a VRM Class I area within the Salmon Falls Reservoir SRMA. From MP 32 to MP 34, shift the corridor west or narrow the corridor to avoid a VRM Class I area. The Agencies could also consider changing the VRM class at the locations of VRM Class I intersections since the corridor is collocated with existing transmission lines.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors, providing a continuous corridor network from Boise, Idaho to Las Vegas, Nevada across BLM-administered lands. The potential minor revisions would minimize impacts on visual resources to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 138-kV and 345-kV transmission lines).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 111-126, no potential IOP revisions or additions have been identified.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 111-226 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 112-226 East Twin Falls Corridor

Agency Jurisdictions

Bureau of Land Management

Burley Field Office
Shoshone Field Office

Idaho Counties

Cassia County
Jerome County
Twin Falls County

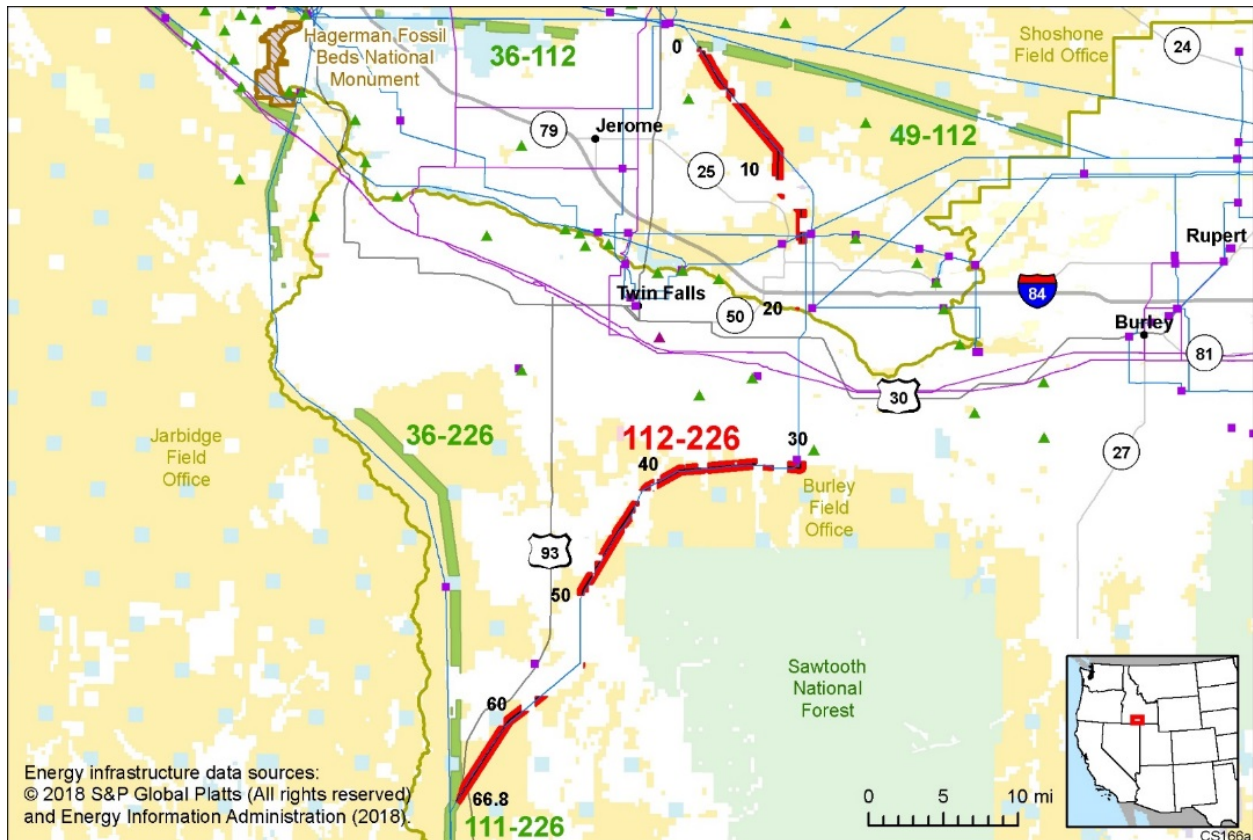


Figure 3.5-43. Corridor 112-226 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Cassia MFP (1985)
Monument RMP (1986)
Twin Falls MFP (1982)
IDMT GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

Consider changing the VRM designation at MP 20 because the corridor follows existing and planned infrastructure and only intersects a small portion of the VRM class II area.

From MP 30 to MP 41, shift the corridor north to align the southern border of the corridor with existing transmission to avoid GRSG IHMA.

Consider changing the VRM class designation at MP 33 and MP 35, because corridor is collocated with existing and planned transmission lines at this location.

From MP 44 to MP 50, shift the corridor northwest to align the southern border of the corridor with existing transmission to avoid GRSG PHMA.

Consider changing the VRM class designation from MP 59 to MP 60 since the corridor is collocated with existing and planned transmission lines at this location.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridors 36-226 and 36-112 which serve Idaho to the north connects to Corridor 49-112, creating a corridor network to the west), creating a continuous corridor network from Las Vegas into Idaho across BLM-administered lands. The potential minor revisions would minimize impacts on GRSG and visual resources to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 230-kV transmission line).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 112-226, specific issues that would be addressed through potential IOP revisions or additions include:

- Wildlife species connectivity and habitat have been identified within the corridor. The Agencies could consider an IOP that minimizes impacts on habitat connectivity.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 112-226 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 121-220 Northwest Rock Springs Corridor

Agency Jurisdictions

Wyoming County

Bureau of Land Management
Rock Springs Field Office

Sweetwater County

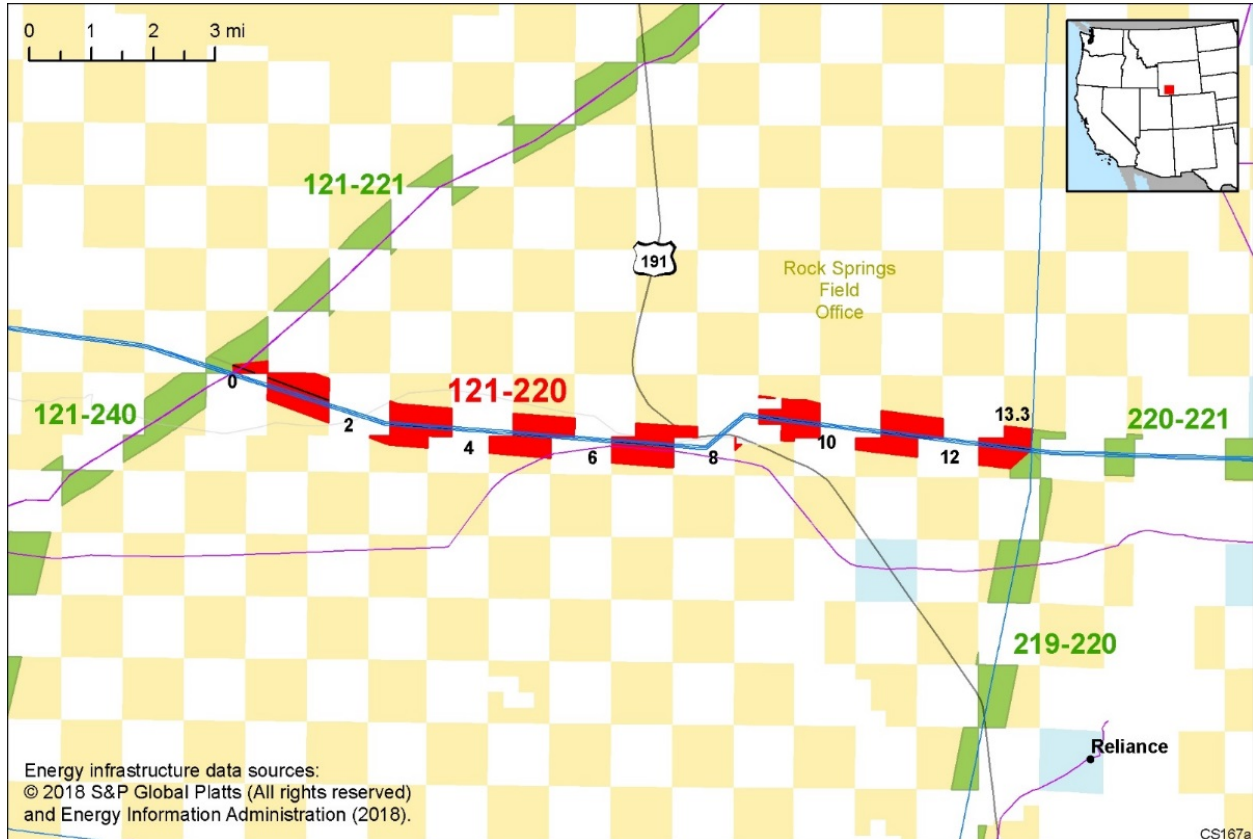


Figure 3.5-44a. Corridor 121-220 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Green River RMP (1997)
Wyoming GRSG ARMPA- Attachment 4 (2019)

Corridor width: 3,500 ft.
Designated use: electric only.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Shift the corridor to the south to align with recently authorized Gateway West route (Figure 3.5-44c).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The short corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 121-221 and Corridor 121-240 to the west and Corridor 219-220 and Corridor 220-221 to the east), creating a continuous corridor network in southern Wyoming across BLM- and USFS-administered lands. The potential corridor revision is consistent with other east-west corridors in the vicinity which also propose corridor revisions to follow Gateway West. GRSG PHMA ROW avoidance areas are not compatible with the corridor's purpose as a preferred location for infrastructure. However, the potential corridor revision would be collocated with a planned transmission line.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Collocating the corridor along Gateway West would consolidate transmission impacts (visual and GRSG habitat).
- Incorporate lessons learned from the Gateway West project when revising Section 368 energy corridors. That project alignment was selected for specific reasons which could help inform the location of Section 368 energy corridors.

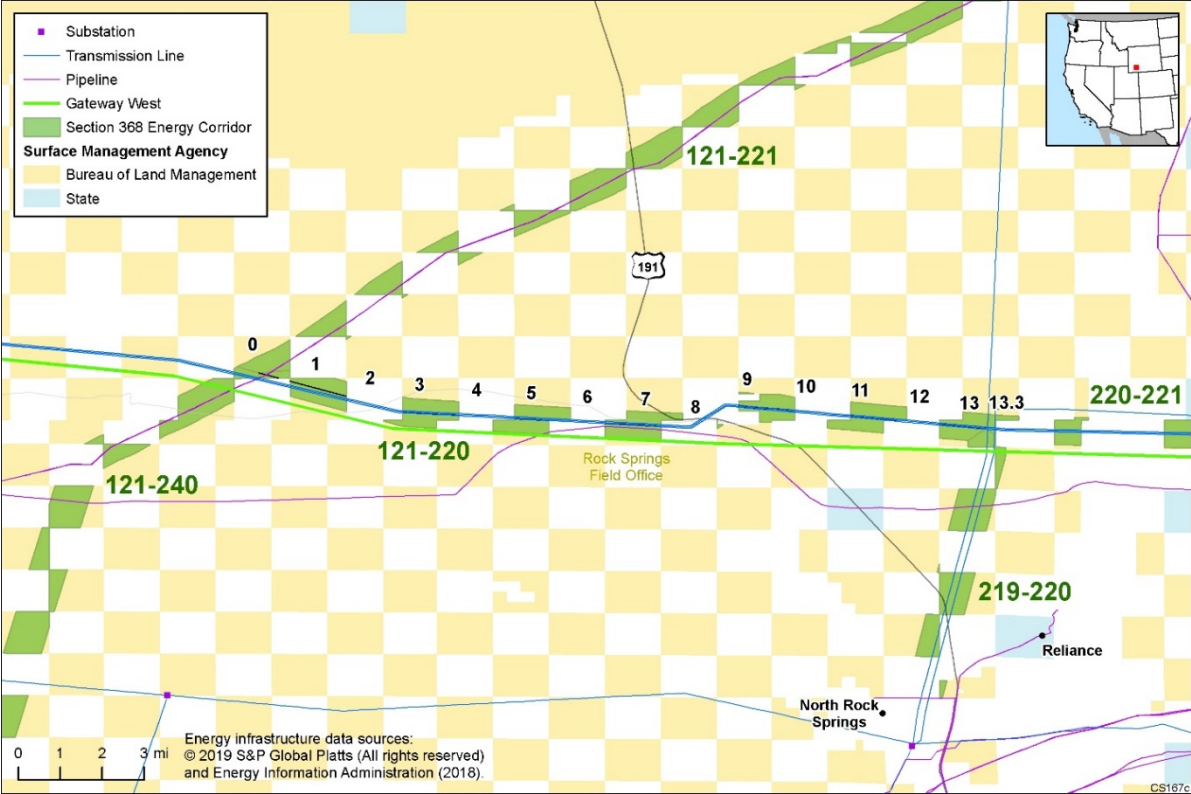


Figure 3.5-44b. Corridor 121-220, as designated

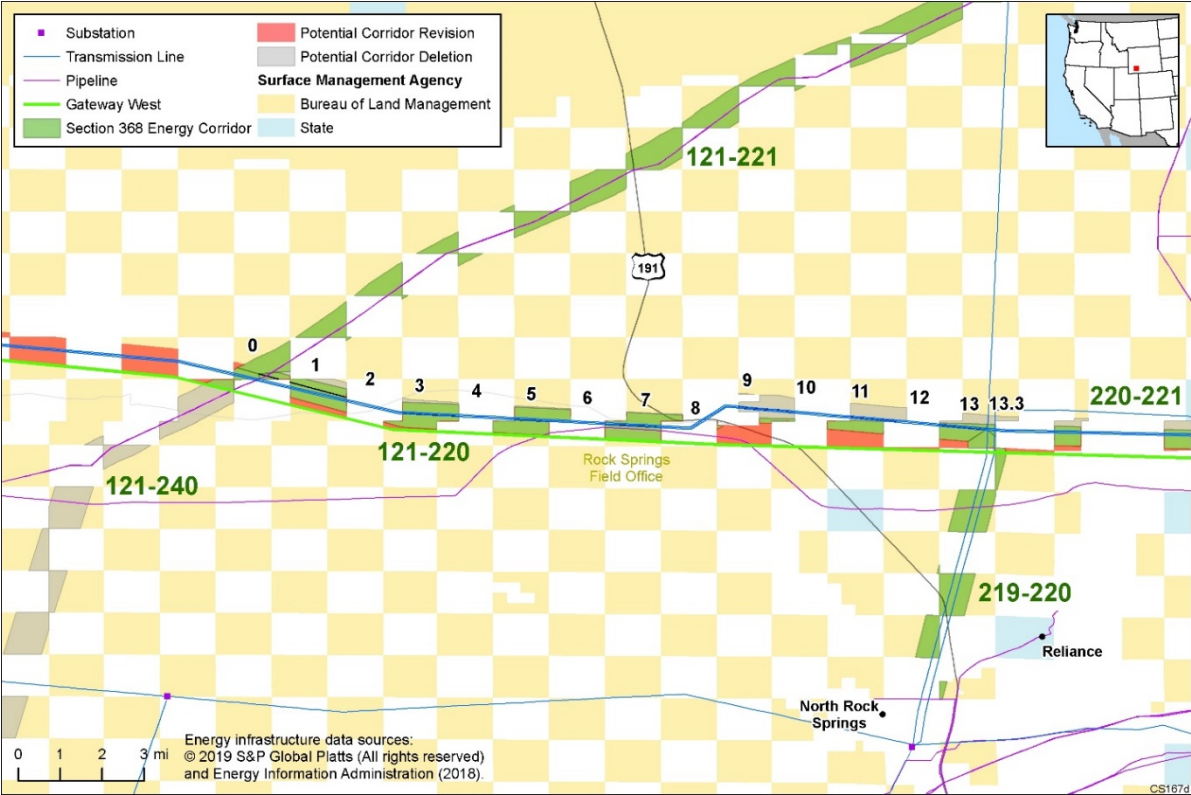


Figure 3.5-44c. Potential Revision to Corridor 121-220

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 121-220, specific issues that would be addressed through potential IOP revisions or additions include:

- The Four Trails Feasibility Study Trail and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 121-220 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 121-221 Rock Springs Bypass Corridor

Agency Jurisdictions

Wyoming County

Bureau of Land Management
Rock Springs Field Office

Sweetwater County

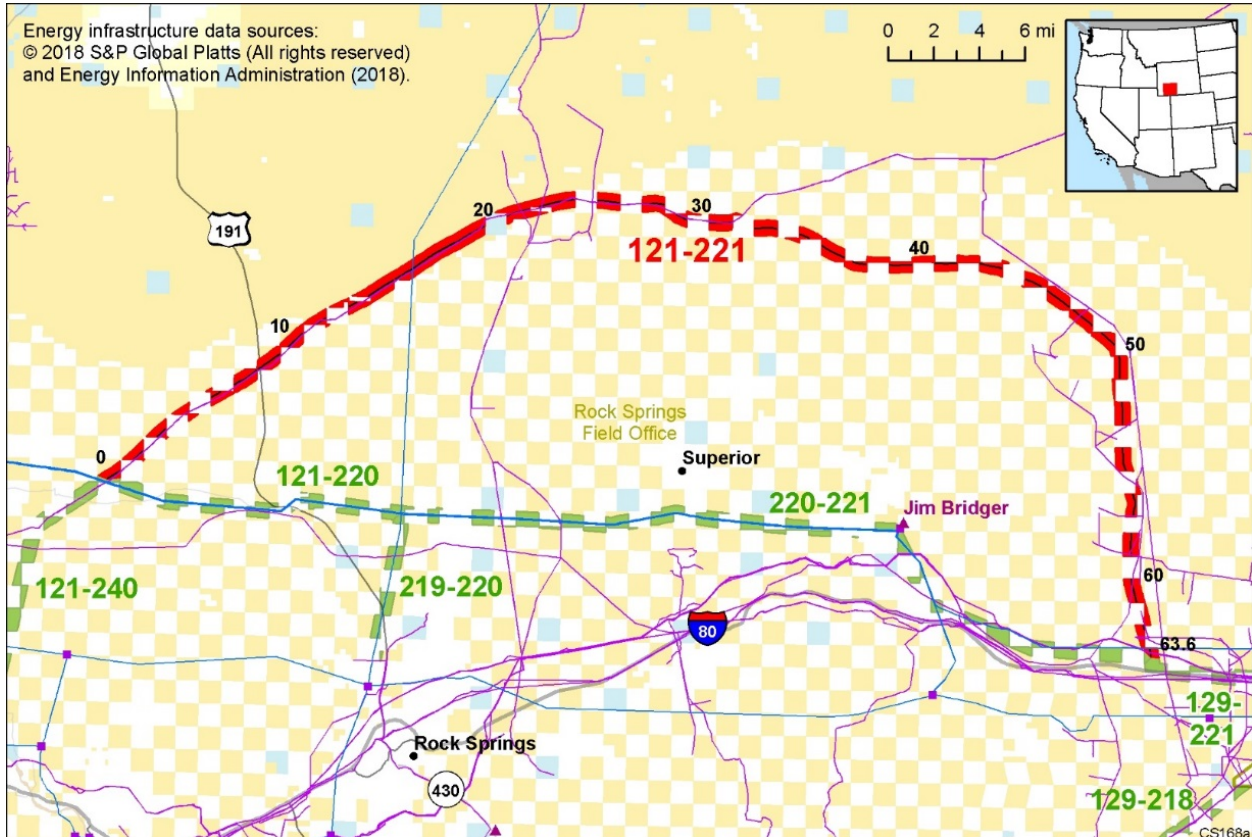


Figure 3.5-45a. Corridor 121-221 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Green River RMP (1997)
Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.
Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).

From MP 31 to the end of the corridor, shift the corridor to follow existing pipeline infrastructure and/or WPCI to avoid undisturbed areas and some overlap with GRSG PHMA.

- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

Between MP 11 and MP 15, shift the corridor to the edge of the existing pipeline to avoid the VRM Class II area while maintaining corridor width where possible on federal lands. The Agencies could also consider changing the VRM class designation.

From MP 27 to MP 28, shift the corridor to the edge of the existing pipeline to avoid the Greater Sand Dunes ACEC, VRM Class II, and the Killpecker Sand Dunes SRMA while maintaining corridor width where possible on federal lands.

- Consider designating the corridor underground-only.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 121-240 to the west and Corridor 129-221 to the east), creating a continuous corridor network in southern Wyoming across BLM-administered lands. The Agencies could consider designating the corridor as underground-only for pipeline use because there are other corridors in the vicinity that could be used for future placement of electrical facilities. The potential revisions would minimize impacts on visual resources, ACEC, Killpecker Sand Dunes SRMA and GRSG to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Delete corridor because of concerns that the siting principles are not strongly supported in this corridor: impacts are not minimized; may be redundant with 121-220/220-221 and Gateway West to the south; currently no transmission lines are present within corridor.
- There are existing CO₂ pipelines along most of the corridor that are serving to connect with the CO₂ demand area in the east.
- BLM needs to coordinate with State of Wyoming about WPCI and with energy companies to better connect/align with energy sources and demand.
- Scenic resources in that area – scenic loop route, Tri-Territory monument, and other visitor experiences.
- Concern about habitat concerns.

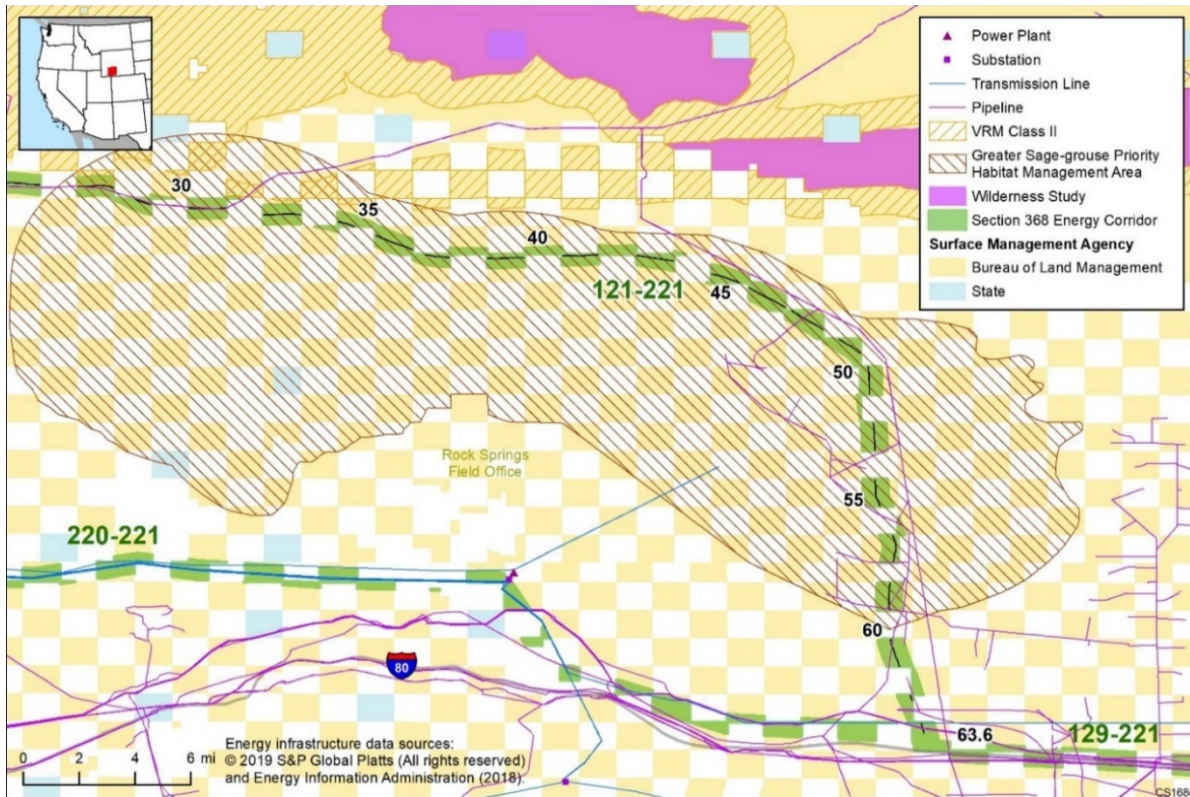


Figure 3.5-45b. Corridor 121-221, as designated

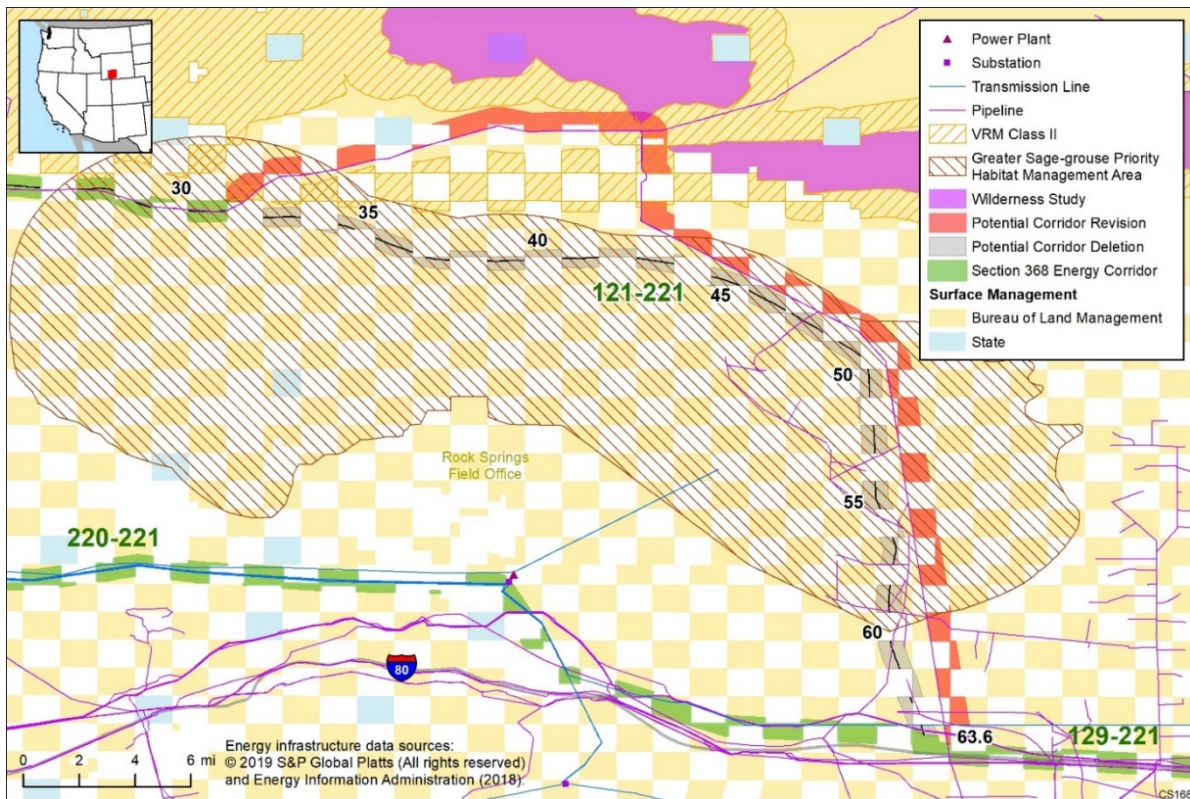


Figure 3.5-45c. Potential Revision to Corridor 121-221

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 121-221, specific issues that would be addressed through potential IOP revisions or additions include:

- The Four Trails Feasibility Study Trail and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 121-221 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 121-240 Northern Green River Bypass Corridor

Agency Jurisdictions

Wyoming County

Bureau of Land Management

Sweetwater County

Kemmerer Field Office
Rock Springs Field Office

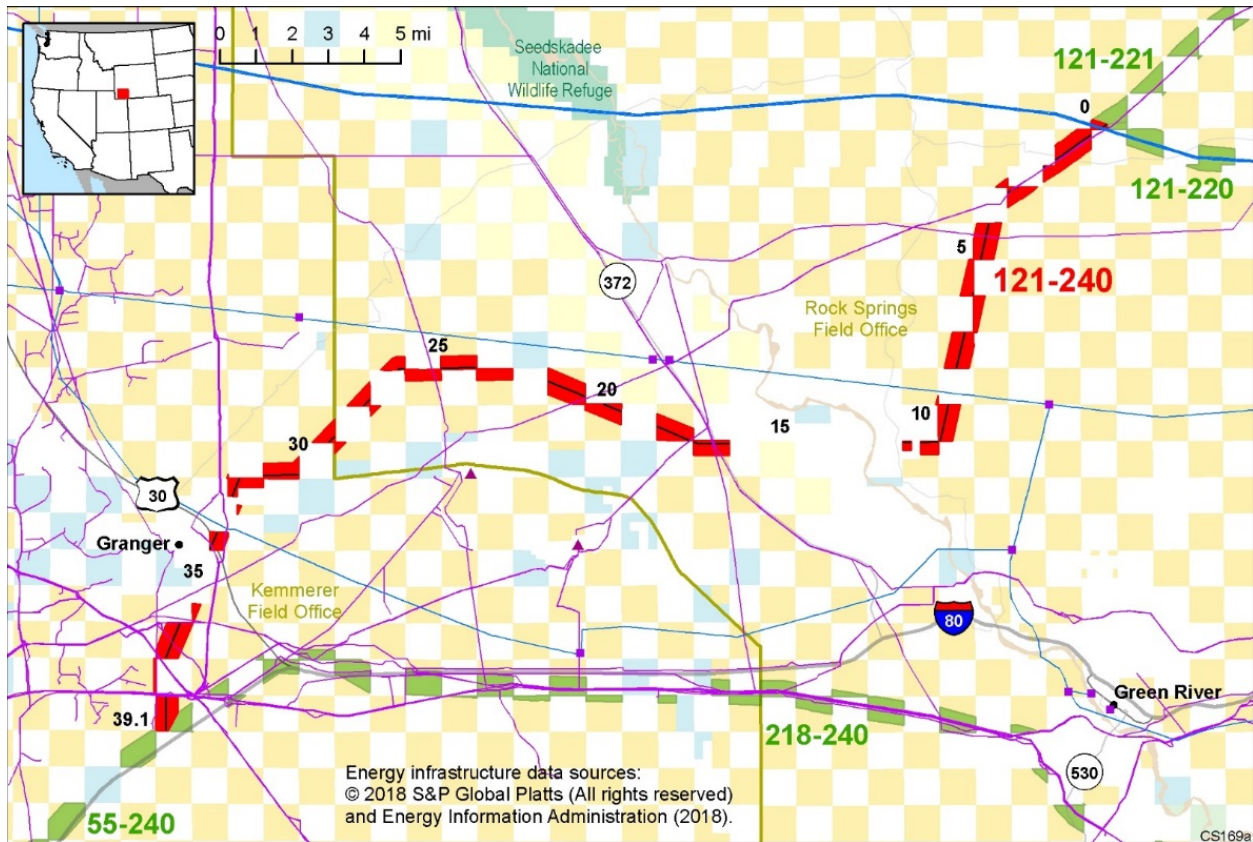


Figure 3.5-46a. Corridor 121-240 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

- Green River RMP (1997)
- Kemmerer RMP (2010)
- Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

Delete the corridor and replace the corridor with the Gateway West potential corridor addition (see *Gateway West Corridor Addition*). The corridor does not follow existing or planned infrastructure from MP 25 to MP 38, portions of the corridor intersect and are adjacent to the Oregon NHT/Mormon Pioneer NHT/Pony Express NHT, the recently authorized Gateway West route is a more preferable pathway for energy transmission than Corridor 121-240 because it better follows energy demand, and the corridor is somewhat redundant with Corridor 218-240 (Figure 3.5-46c).

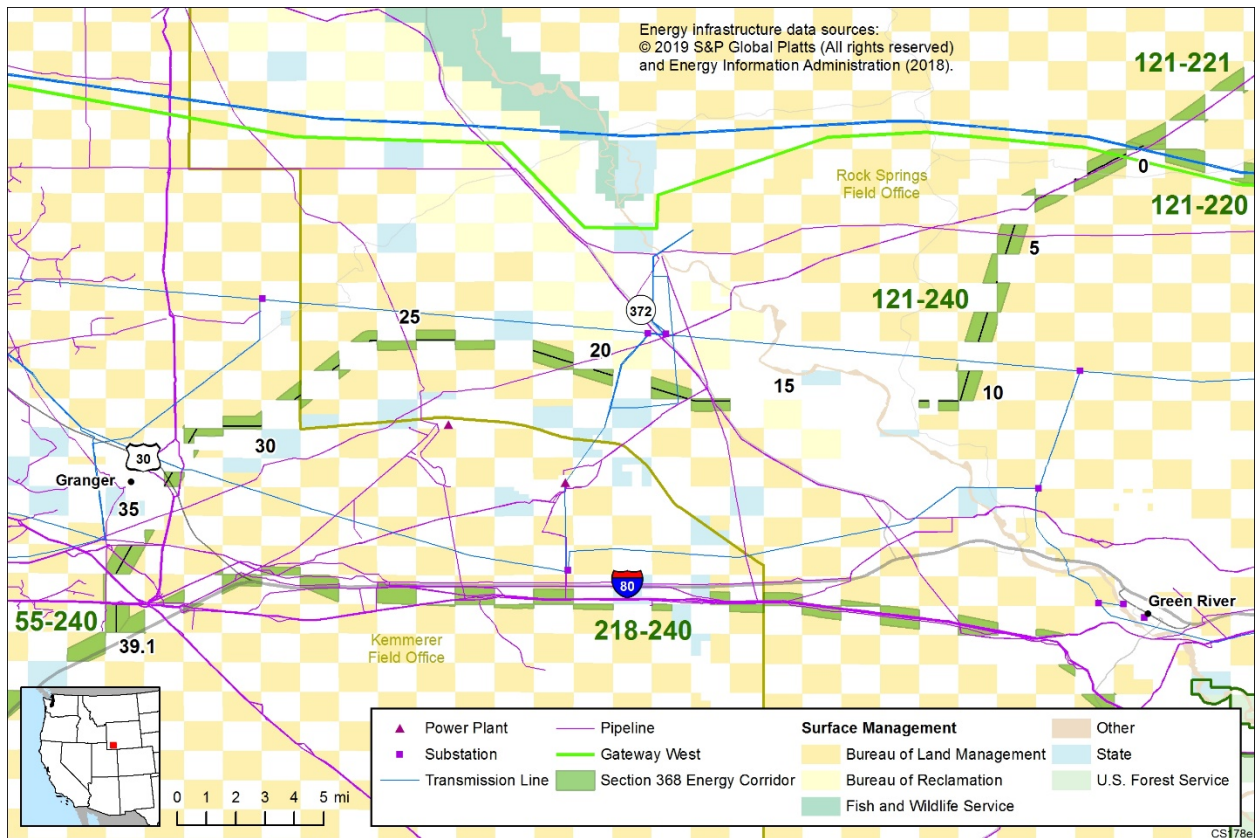


Figure 3.5-46b. Corridor 121-240, as designated

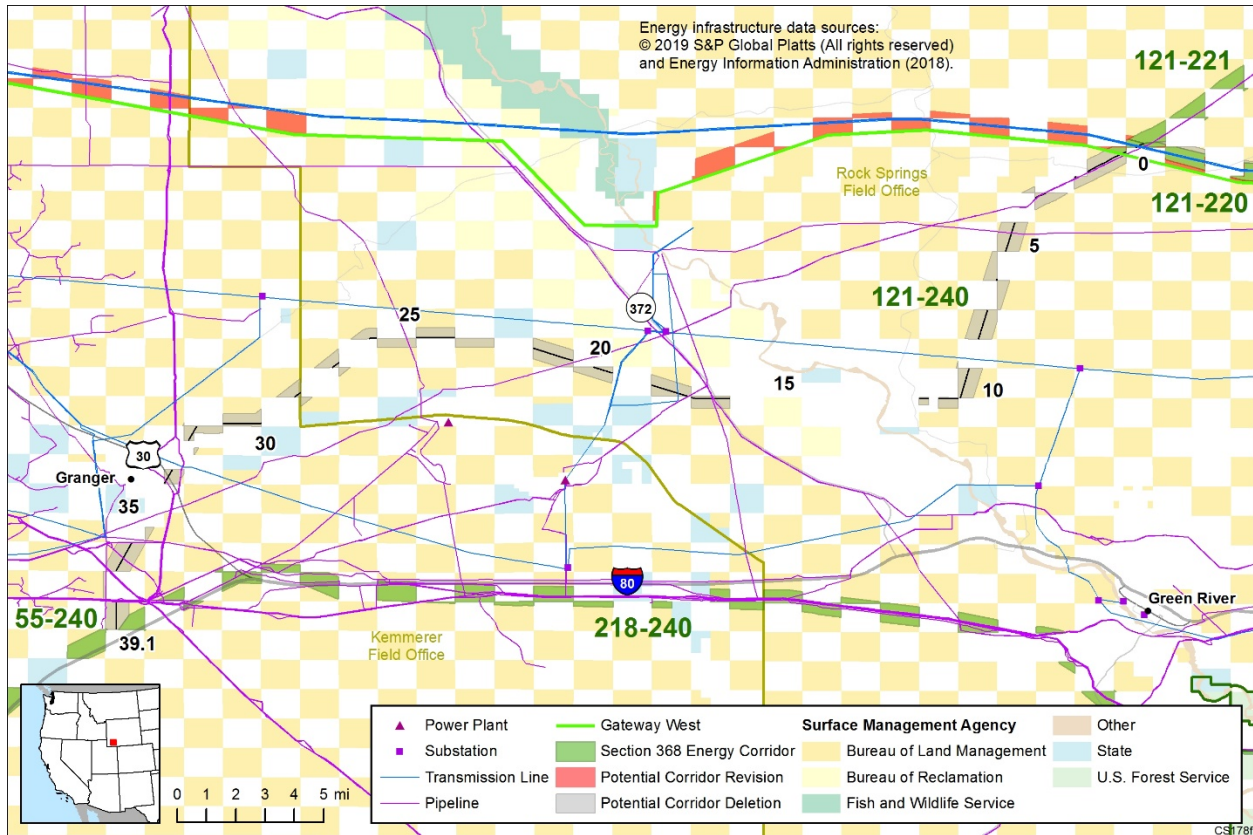


Figure 3.5-46c. Potential Revision to Corridor 121-240

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 121-240 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 126-218 Vernal to Rock Springs Corridor

Agency Jurisdictions

Wyoming County

Bureau of Land Management

Sweetwater County

Rock Springs Field Office

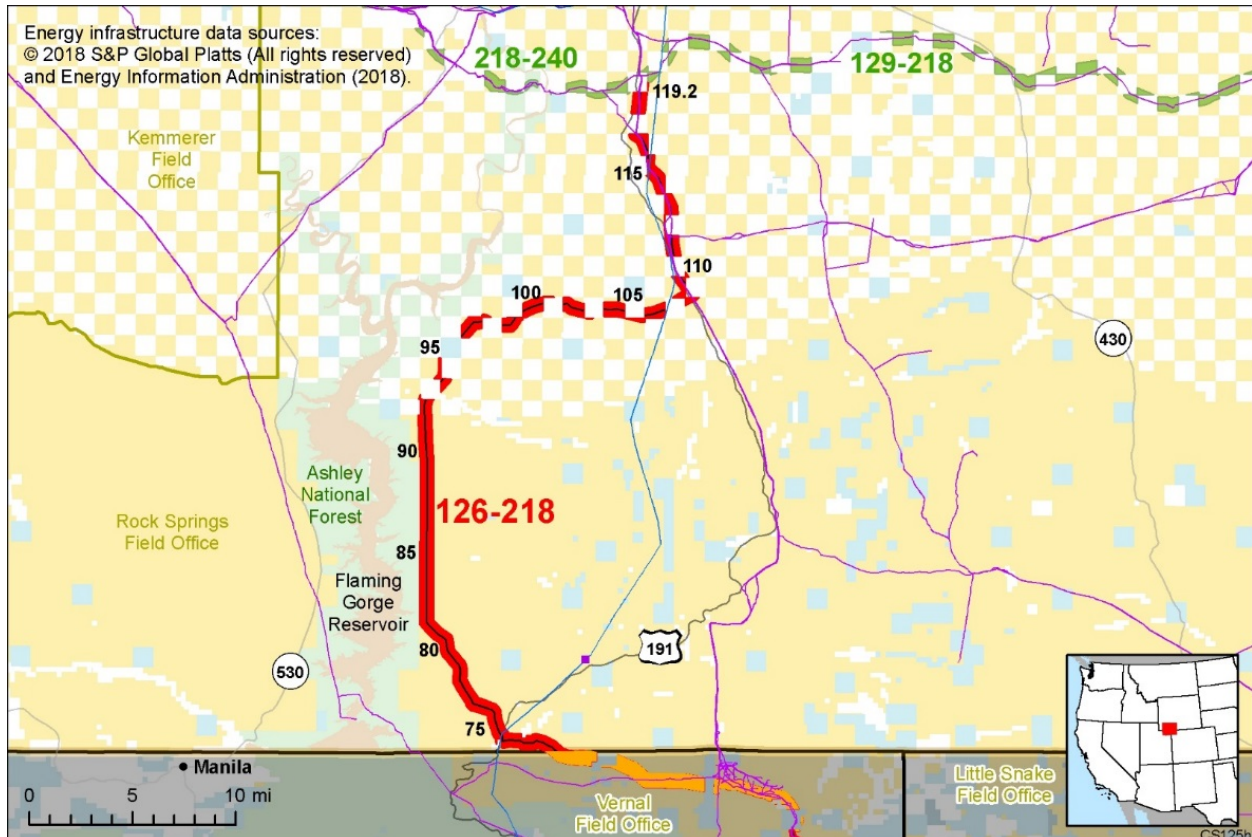


Figure 3.5-47a. Corridor 126-218 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Green River RMP (1997)

Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: underground only from MP 71 to MP 108, multi-modal for electric transmission and pipelines from MP 108 to MP 119.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Delete corridor from MP 62 (in Utah) to MP 109 and route the corridor along either existing pipeline or transmission line to the east (Figure 3.5-47c).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The potential revision would minimize impacts on the Flaming Gorge NCA while maintaining a preferred route for potential future energy development collocated with existing and planned infrastructure. There is no transmission capacity in the area to accommodate wind development, so any new wind energy development would require new transmission lines. Future energy need should inform whether or not the potential revision follows the existing pipeline or transmission line. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 129-218 and Corridor 218-240 to the north and Corridor 126-133 and Corridor 126-258 to the south), creating an interstate pathway for electrical and pipeline transmission between Utah and Wyoming.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Consider disturbance caps for GRSG in Nevada ARMPAs because they could affect development within the corridor.
- Existing corridor borders Flaming Gorge NRA-concerns include water quality and pipelines and visual concerns.
- Topography concerns both with existing corridor and alternative routes; steep topography could limit development.
- Potential corridor revision would cross the Greater Red Creek ACEC, PHMA, and the Greater Little Mountain Area, which contains important big game habitat.
- Consider designating potential revision as underground only to avoid impacts on GRSG and other resources.

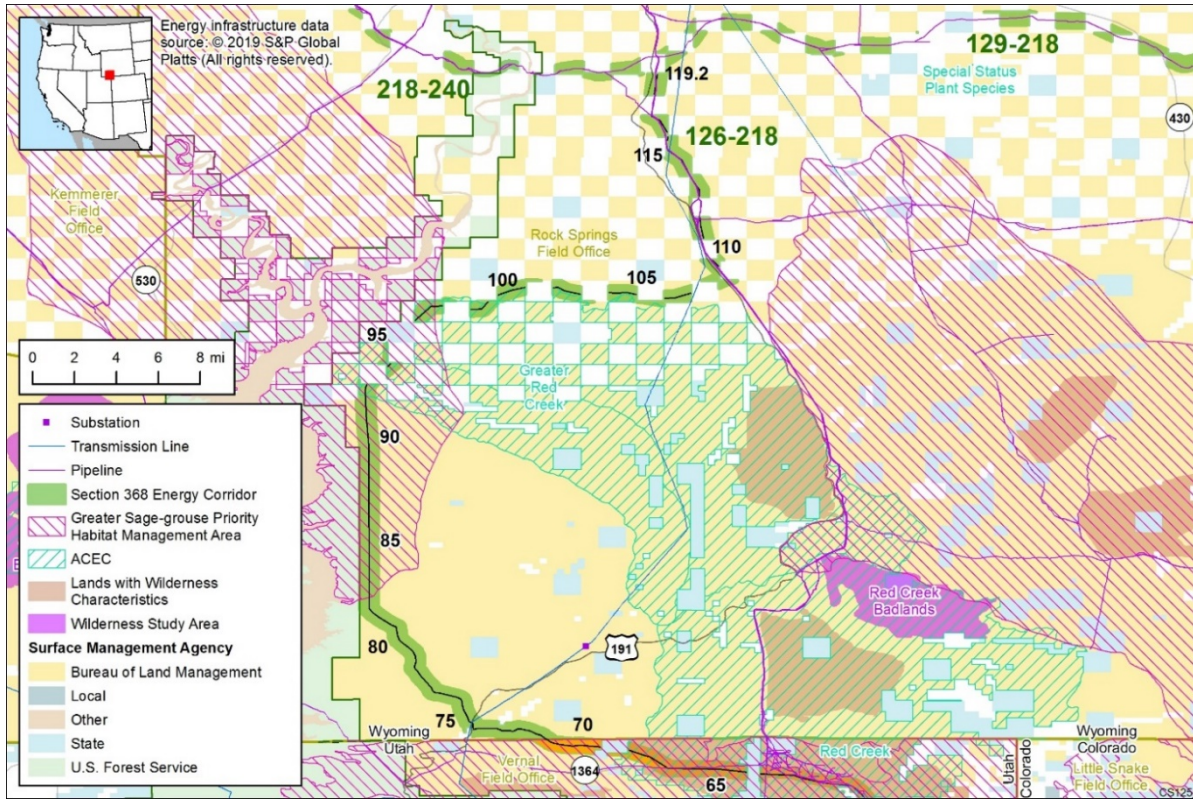


Figure 3.5-47b. Corridor 126-218, as designated

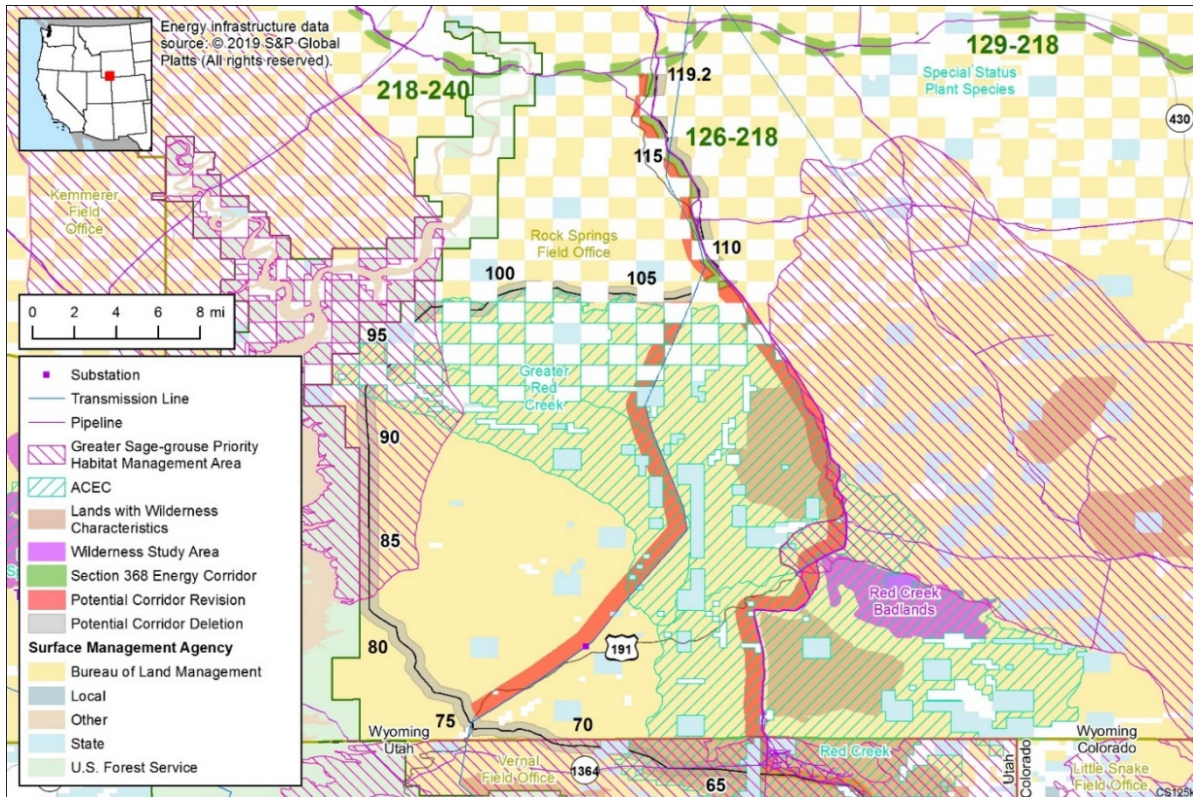


Figure 3.5-47c. Potential Revision to Corridor 126-218

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 126-218, specific issues that would be addressed through potential IOP revisions or additions include:

- The Four Trails Feasibility Study and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 126-218 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 129-218 South Rock Springs Corridor

Agency Jurisdictions

Wyoming County

Bureau of Land Management

Sweetwater County

Rawlins Field Office

Rock Springs Field Office



Figure 3.5-48. Corridor 129-218 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Green River RMP (1997)

Rawlins RMP (2008)

Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

At the time of the review, the existing corridor location is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 218-240 and Corridor 126-218 to the west and Corridors 73-129 and 129-221 to the north and east), creating a continuous corridor network across southern Wyoming and into Utah across BLM- administered lands collocated with existing infrastructure (i.e., pipeline).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 129-218, specific issues that would be addressed through potential IOP revisions or additions include:

- The Four Trails Feasibility Study Trail and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 129-218 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 129-221 Wyoming I-80 Connector Corridor

Agency Jurisdictions

Wyoming County

Bureau of Land Management

Sweetwater County

Rawlins Field Office
Rock Springs Field Office

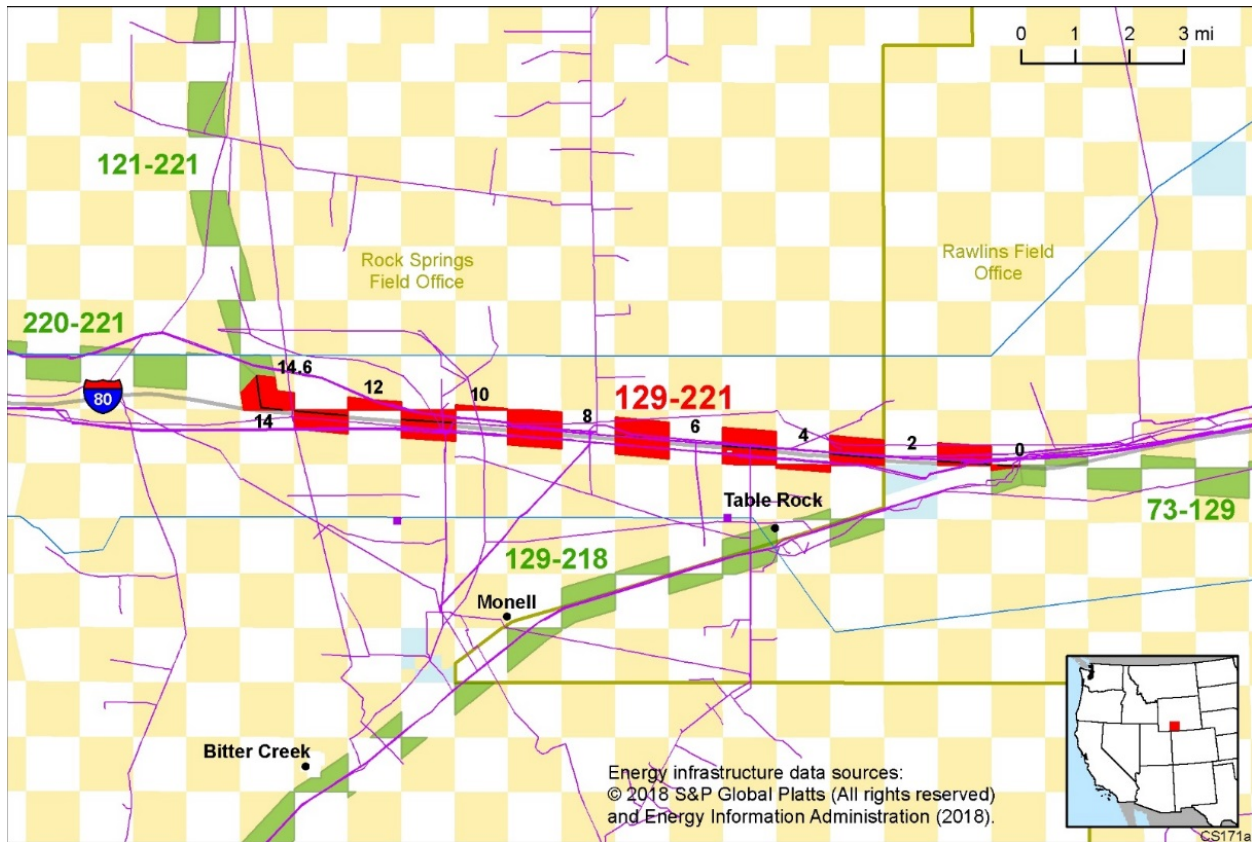


Figure 3.5-49a. Corridor 129-221 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

- Green River RMP (1997)
- Rawlins RMP (2008)
- Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Shift entire corridor to follow the recently authorized Gateway West transmission line (Figure 3.5-49c).

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor provides an east-west pathway for energy transport through southern Wyoming across BLM-administered lands, and links multiple Section 368 energy corridors to create a continuous corridor network. The potential revision is consistent with other corridor revisions along the Gateway West route. It creates a preferred route for potential future energy development collocated with planned infrastructure and provides connectivity to renewable energy generation.

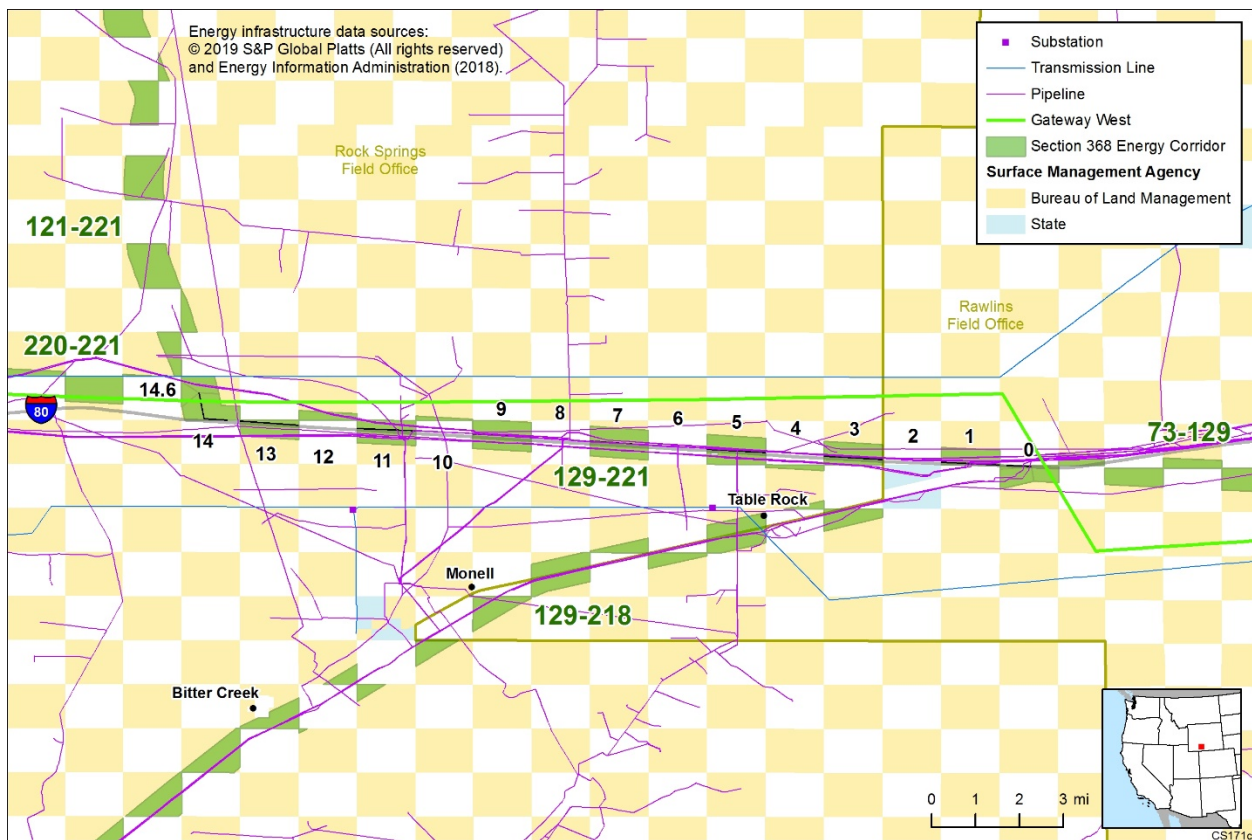


Figure 3.5-49b. Corridor 129-221, as designated

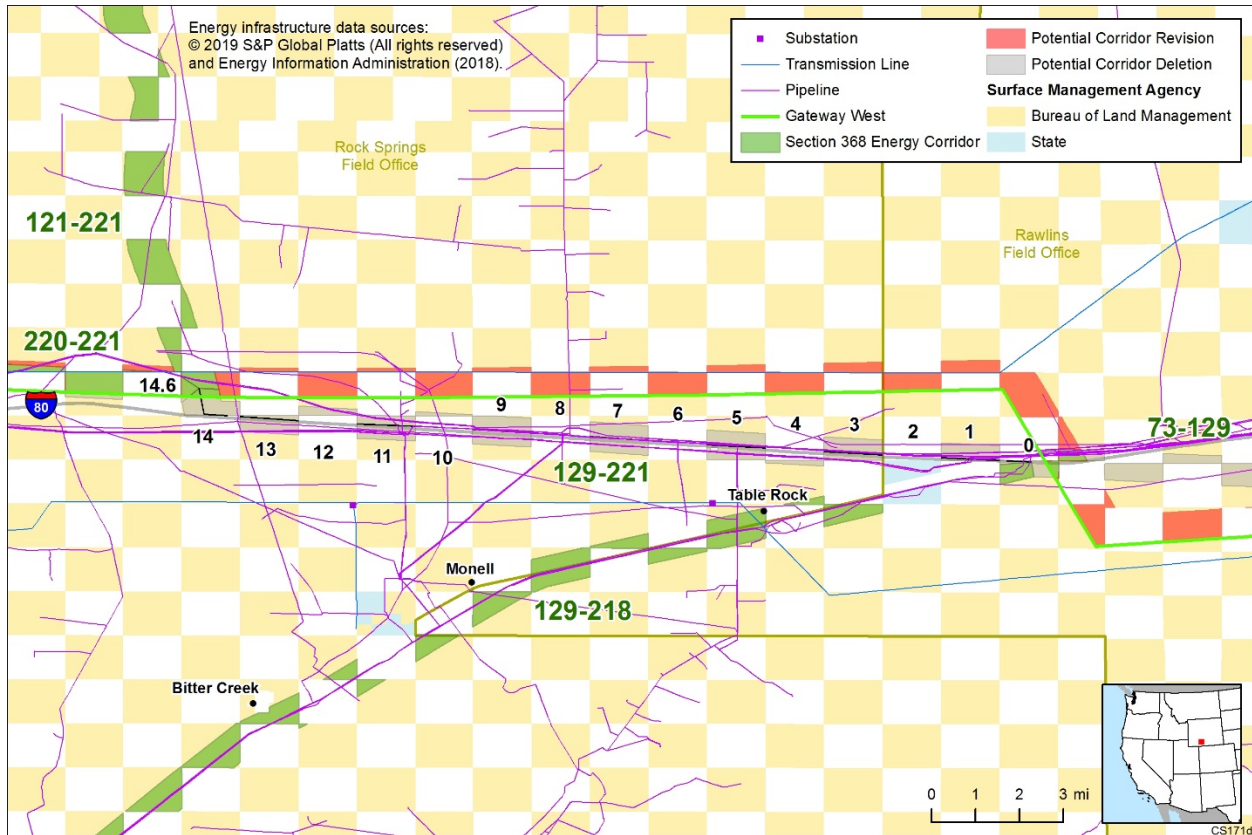


Figure 3.5-49c. Potential Revision to Corridor 129-221

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 129-221, no potential IOP revisions or additions have been identified.

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 129-221 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 138-143 Baggs Corridor

Agency Jurisdictions

Bureau of Land Management
Rawlins Field Office

Wyoming Counties

Carbon County
Sweetwater County

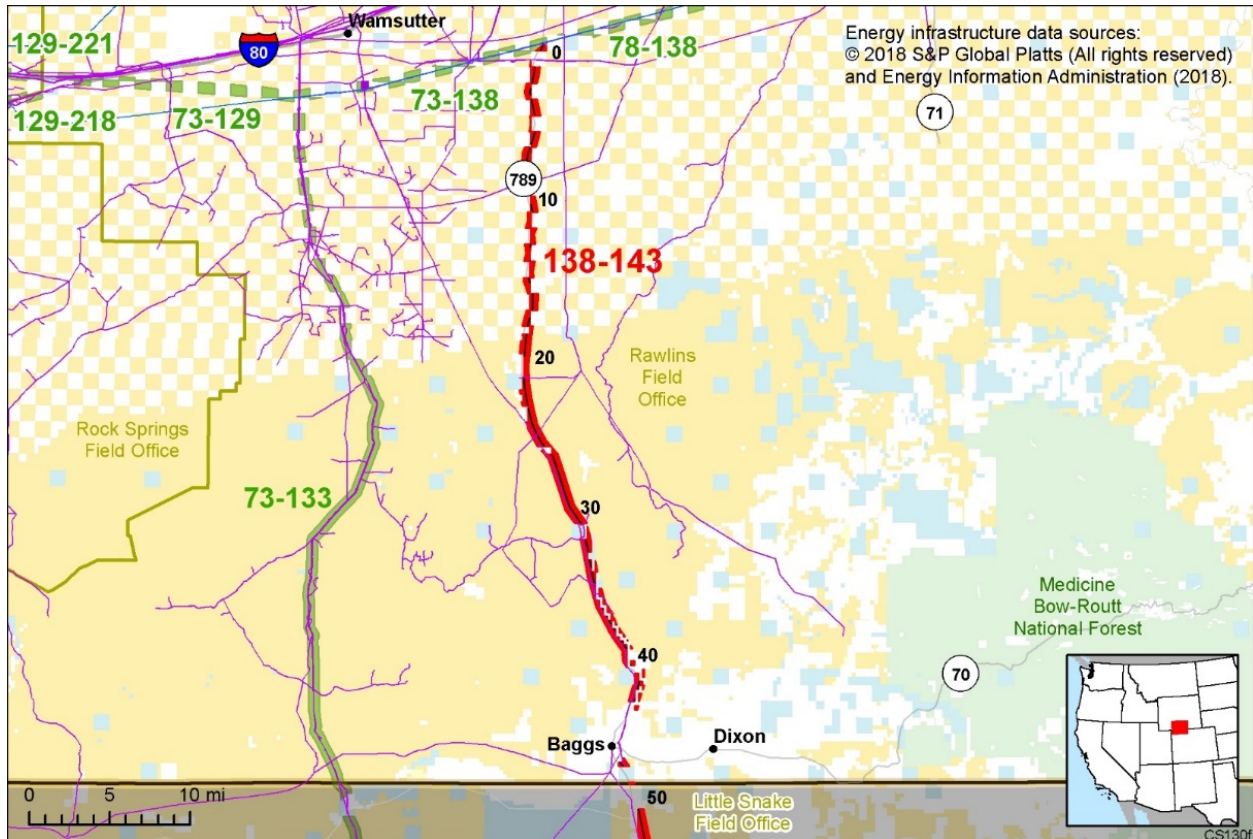


Figure 3.5-50a. Corridor 138-143 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Rawlins RMP (2008)
Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Delete the corridor and replace with the Wamsutter-Powder Rim potential corridor addition (Figure 3.50-c).

There are two corridors (Corridor 138-143 and Corridor 73-133) that run north-south in this area, providing connectivity between Wyoming and Colorado. The Agencies could consider upgrading the 3,500-ft Wamsutter-Powder Rim locally designated utility corridor along the authorized TransWest Express route (east of Corridor 73-133) to a Section 368 energy corridor and deleting Corridor 138-143 (see *Summary for the Wamsutter-Powder Rim Corridor Addition*). Corridor 138-143 does not follow existing energy infrastructure from MP 0 to MP 25. The recently authorized TransWest/Gateway South route is a more preferable pathway for energy transmission than Corridor 138-143 and would be collocated with planned infrastructure along its entire route.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Habitat concerns, including GRSG PHMA (MP 1 to MP 7 and MP 51 to MP 62) and GRSG GHMA (MP 7 to MP 50 and MP 63 to MP 67); also a Mule Deer migration route.

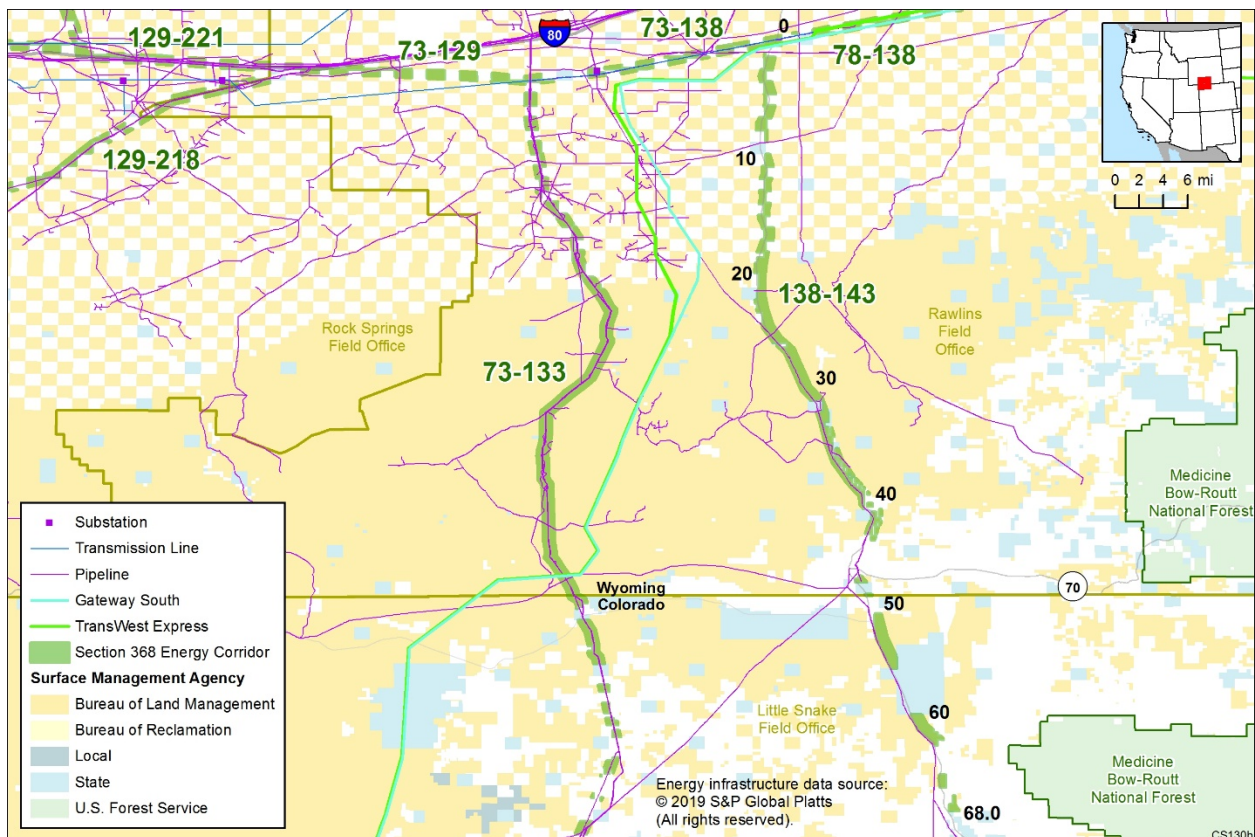


Figure 3.5-50b. Corridor 138-143, as designated

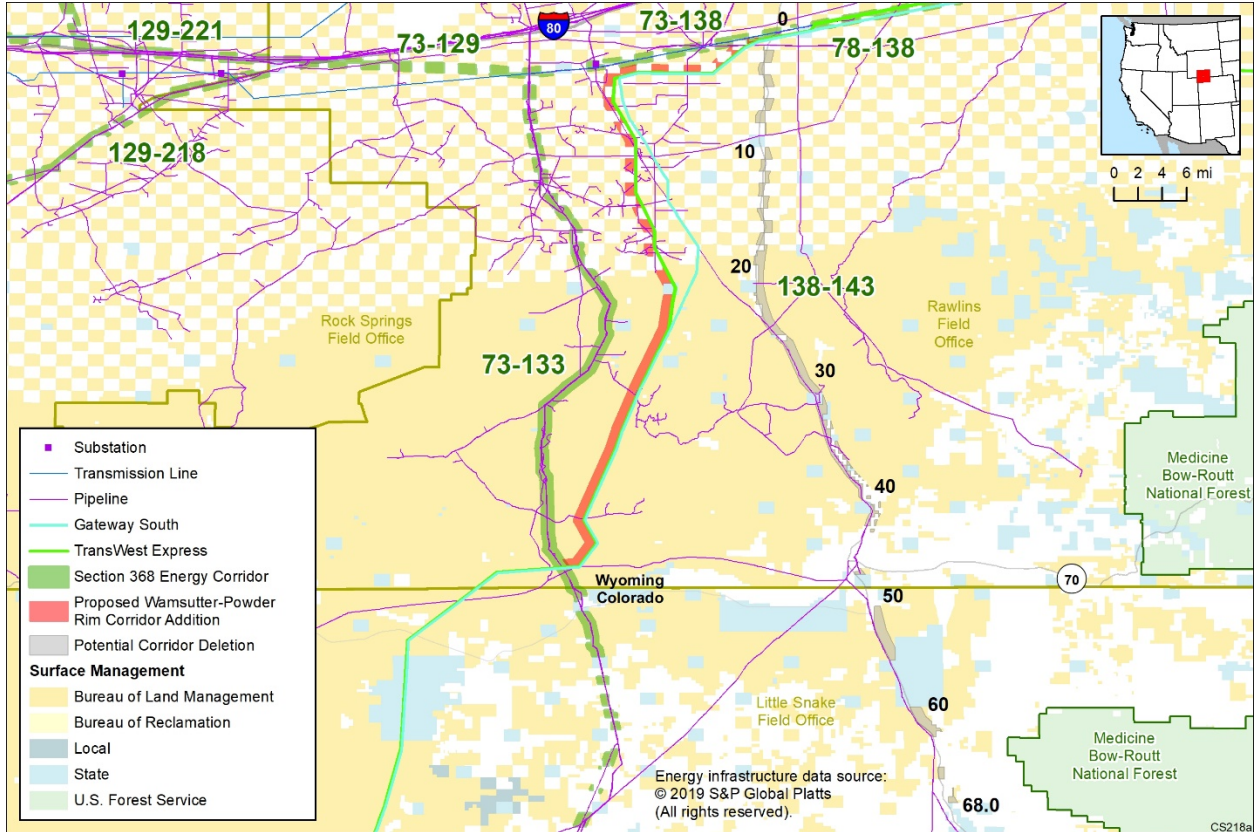


Figure 3.5-50c. Potential Revision to Corridor 138-143

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 138-143 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 218-240 South Green River Corridor

Agency Jurisdictions

Wyoming County

Bureau of Land Management

Sweetwater County

Kemmerer Field Office
Rock Springs Field Office

Forest Service

Ashley National Forest

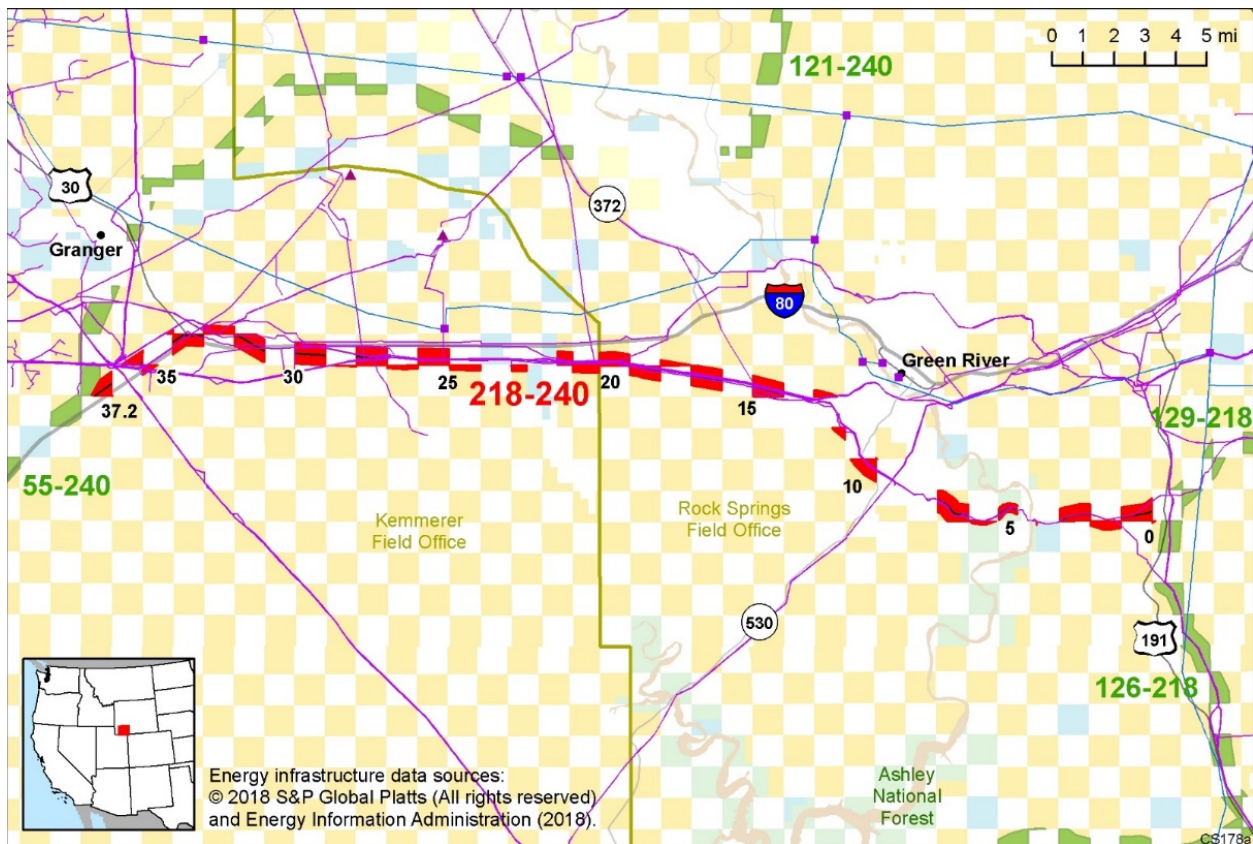


Figure 3.5-51. Corridor 218-240 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

- Green River RMP (1997)
- Kemmerer RMP (2010)
- Ashley National Forest LMP (1986)
- Wyoming GRSG ARMPA (2019)
- GRSG ROD for Idaho and Southwest Montana, Nevada, Utah (2015)

Corridor width: 3,500 ft on BLM-administered land and 1,500 ft on USFS administered land.

Designated use: multi-modal for electric transmission and pipelines on BLM-administered land, underground only on USFS-administered land.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 18 to MP 23, shift the corridor to the north so that existing infrastructure would be on the southern edge of the corridor to reduce disturbance of PHMA.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 55-240 to the west, Corridor 129-218 to the east, and Corridor 126-218 to the south), creating a continuous corridor network in southern Wyoming across BLM- and USFS-administered lands. The potential corridor revision would help minimize impacts on GRSG. Conflicts with trona leasing have the potential to limit future development within the corridor. High potential leasing areas should be avoided for corridor siting.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Narrow corridor where it crosses Blacks Fork River and Green River.
- Designate corridor as underground-only
- Consider impacts on the Four Trails Feasibility Study Trail; corridor parallels long portions of the trail.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 218-240, specific issues that would be addressed through potential IOP revisions or additions include:

- The Four Trails Feasibility Study Trail and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- A Roadless Area and the corridor intersect. Agencies could consider a coordination IOP related to Roadless Areas to help minimize conflicts with the Roadless Rule.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 218-240 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 219-220 Reliance Corridor

Agency Jurisdictions

Wyoming County

Bureau of Land Management
Rock Springs Field Office

Sweetwater County

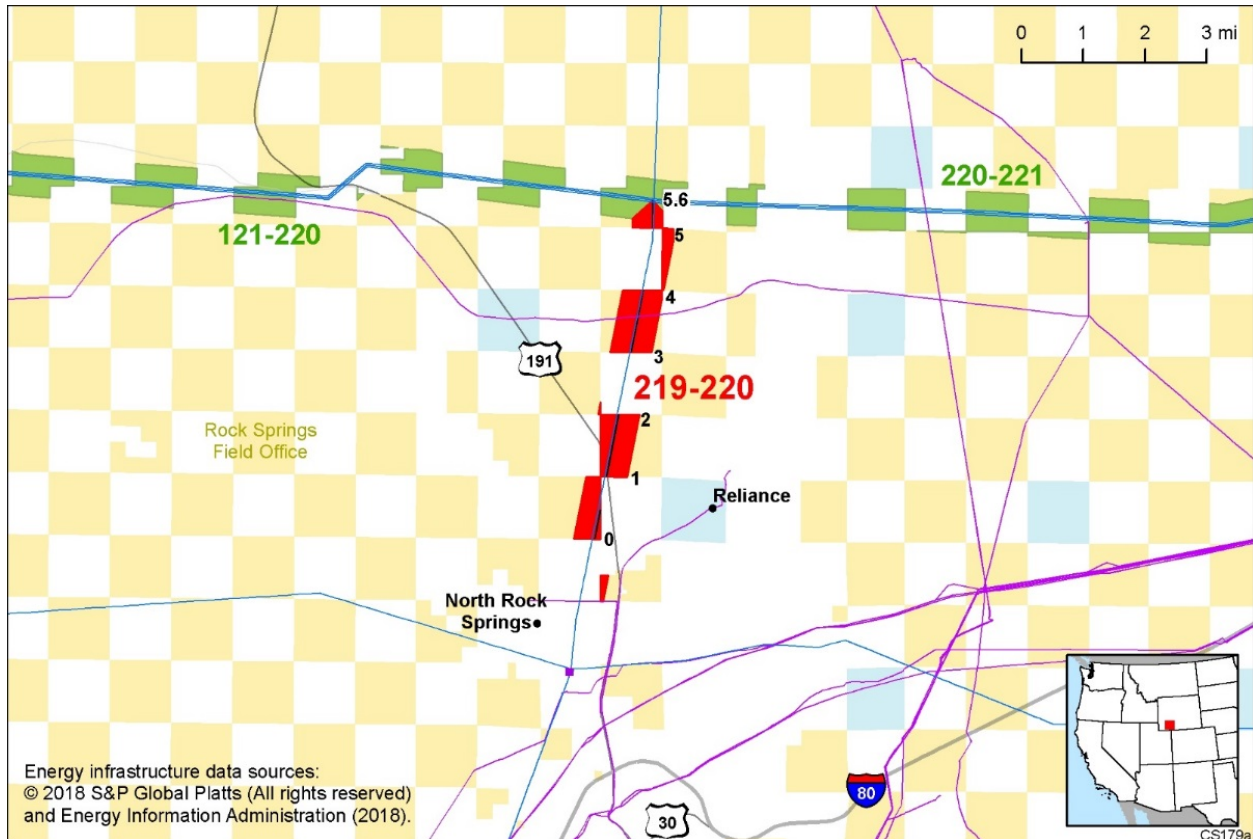


Figure 3.5-52a. Corridor 219-220 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Green River RMP (1997)
Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.
Designated use: electric only.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

At the time of the review, the existing corridor location is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a pathway for electric energy transport in southern Wyoming. The location appears to best meet the siting principles because collocation is preferred, and the corridor is collocated with existing transmission lines (i.e. 230-kV transmission line).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 219-220, no potential IOP revisions or additions have been identified.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 219-220 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 220-221 North Rock Springs Corridor

Agency Jurisdictions

Wyoming County

Bureau of Land Management
Rock Springs Field Office

Sweetwater County

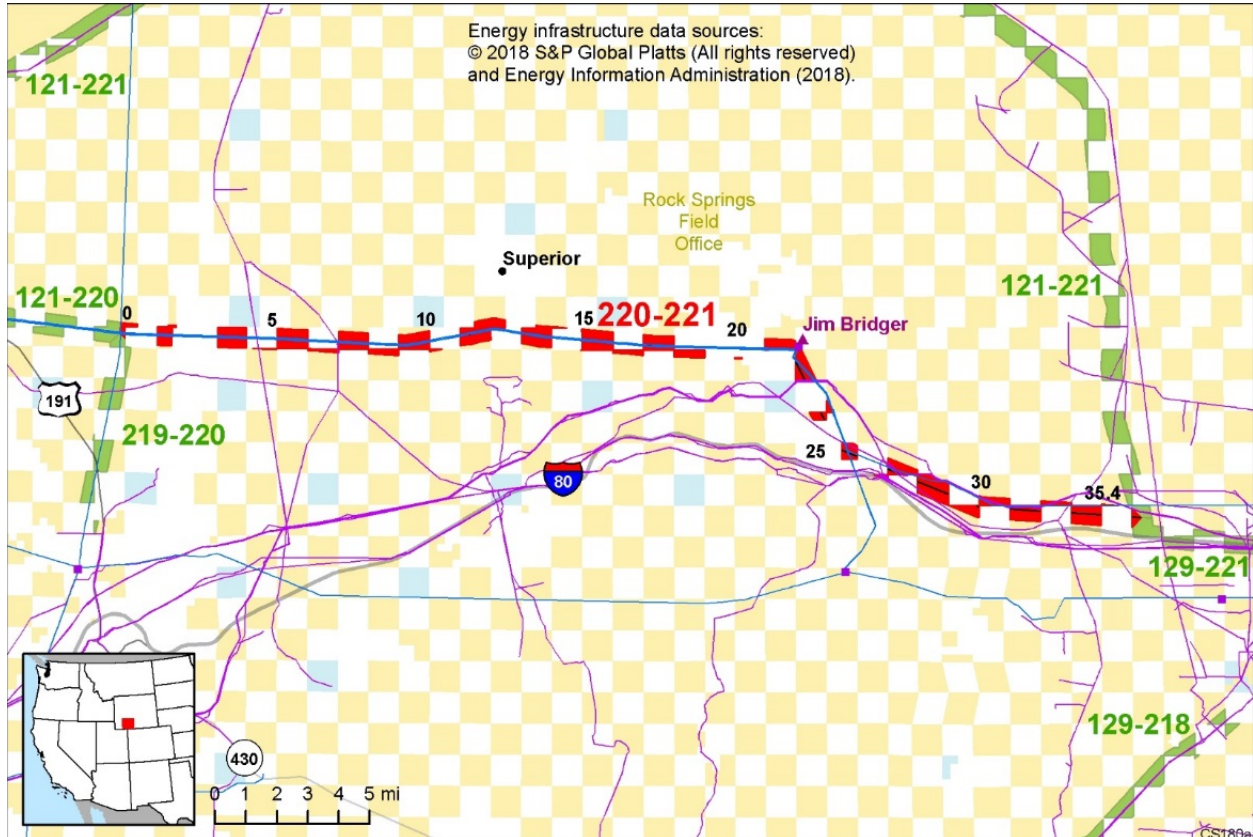


Figure 3.5-53a. Corridor 220-221 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Green River RMP (1997)
Wyoming GRSG ARMPA (2019)

Corridor width: 3,500 ft.
Designated use: electric only.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Shift entire corridor along the recently authorized Gateway West route.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a link to other Section 368 energy corridors (Corridor 121-220 and Corridor 219-220 to the west and Corridor 129-221 to the east), creating a continuous corridor network in southern Wyoming across BLM-administered lands. The potential revision is consistent with other corridor revisions along the Gateway West route. It creates a preferred route for potential future energy development collocated with planned infrastructure and provides connectivity to renewable energy generation.

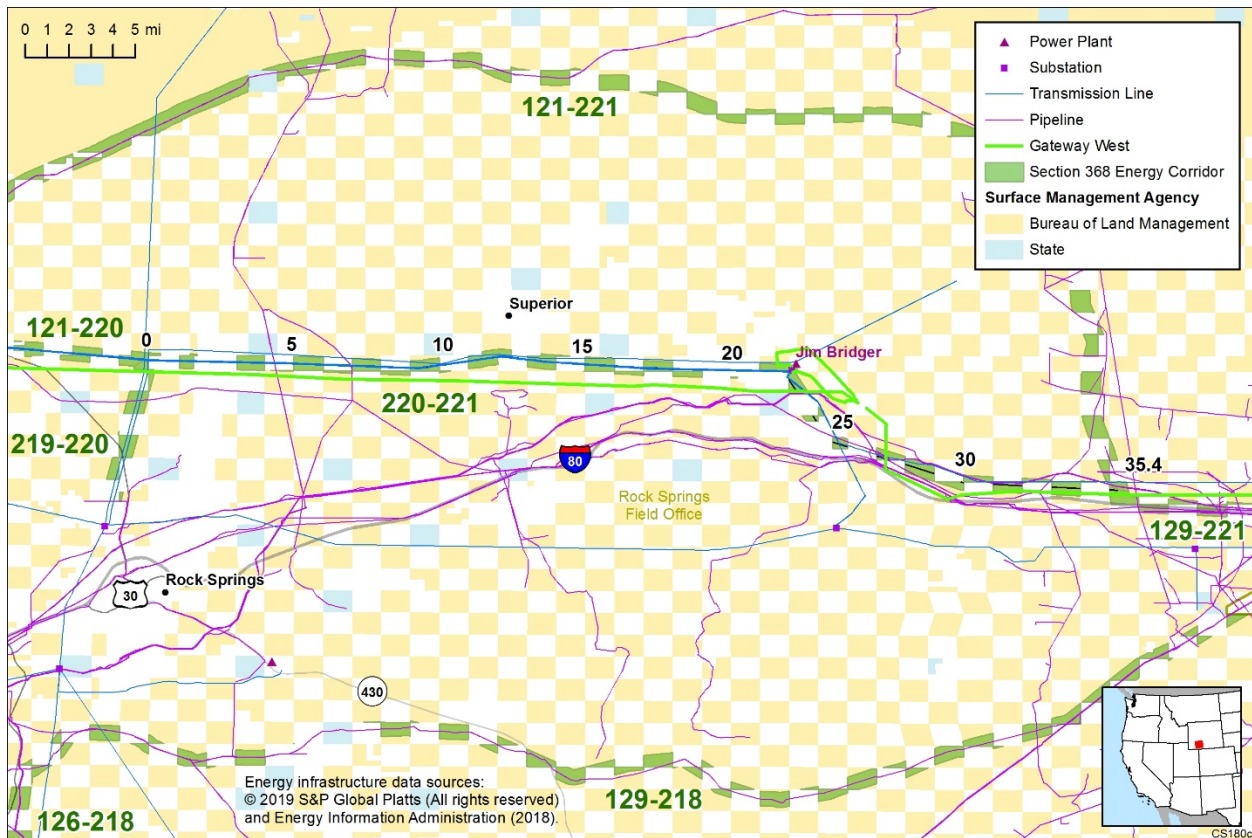


Figure 3.5-53b. Corridor 220-221, as designated

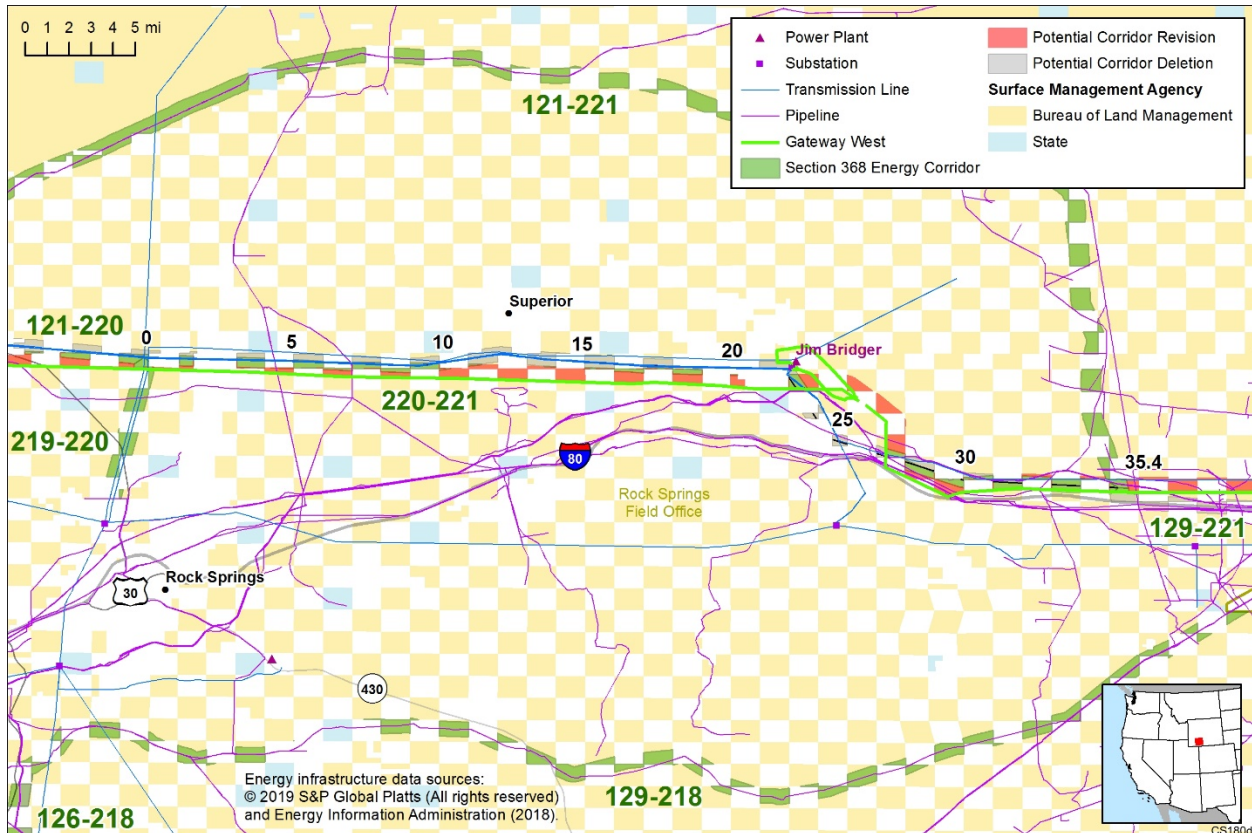


Figure 3.5-53c. Potential Revision to Corridor 220-221

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 220-221, specific issues that would be addressed through potential IOP revisions or additions include:

- The Four Trails Feasibility Study Trail is located on private lands between MP 26 and MP 28. The logical extension of the corridor between the designated corridor segments would cross and could potentially impact the trail. An IOP for NSTs, NHTs and Feasibility Study Trails would further reduce impacts on these resource values.

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 220-221 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 229-254(S) Mullan to Alberton Corridor

Agency Jurisdictions

Forest Service

Idaho Panhandle National Forests

Lolo National Forest

Idaho County

Shoshone County

Montana County

Mineral County

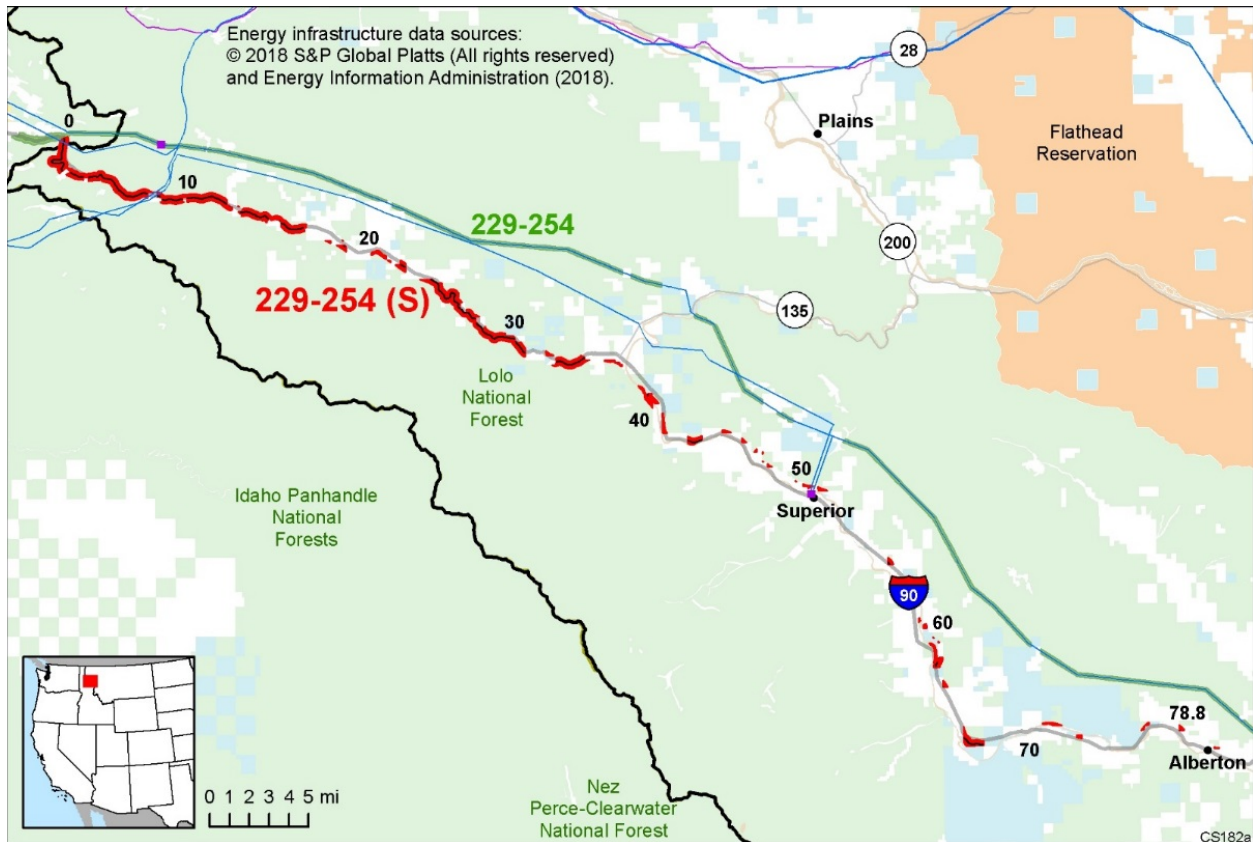


Figure 3.5-54a. Corridor 229-254(S) and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Idaho Panhandle National Forests LMP (S 2015)

Lolo National Forest Plan (1986)

Corridor width: 2,000 ft.

Designated use: underground only.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).

Designate as multi-modal instead of underground only since there is an existing transmission line within the corridor.

- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 25 to MP 50 braid the corridor to align with existing transmission rather than Interstate 90 to avoid Bull Trout critical habitat and conflicts with highway ROW.

Consider adjustments to avoid terrain concerns

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by creating an energy pathway from eastern Idaho to western Montana. The potential minor revisions would minimize impacts on critical habitat to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure. The corridor could be designated as multi modal since there may be a need or demand to increase capacity on the existing transmission line. The corridor may be limited by terrain and landform. Fragmented land ownership (private land) could make development within the corridor difficult.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- In Montana, pipeline and transmission line ROWs cannot be located within an interstate transportation ROW. Corridors can cross highways but would require analysis and could be challenging.
- Difficult terrain in the area for large transmission lines.
- Reliability concerns-the existing transmission line took the preferred location given the terrain, and there may not be enough capacity for additional energy infrastructure.
- Clearance required for pipelines is 50 feet on either side of pipeline.
- Improved coordination with railroad companies – in some areas of the United States they are installing transmission lines within railroad ROWs, however, there could be additional fees and higher costs may drive energy developers to other locations.
- Early engagement with local government at project-specific level
- Consider residential areas. Look to GIS and CADASTRAL data.
- Given the mountainous terrain in this area, there will be a need for access roads. There is concern about the effect that might have on roadless areas. Buffers should be added outside of the corridors or access roads should be constructed prior to development within the corridor.

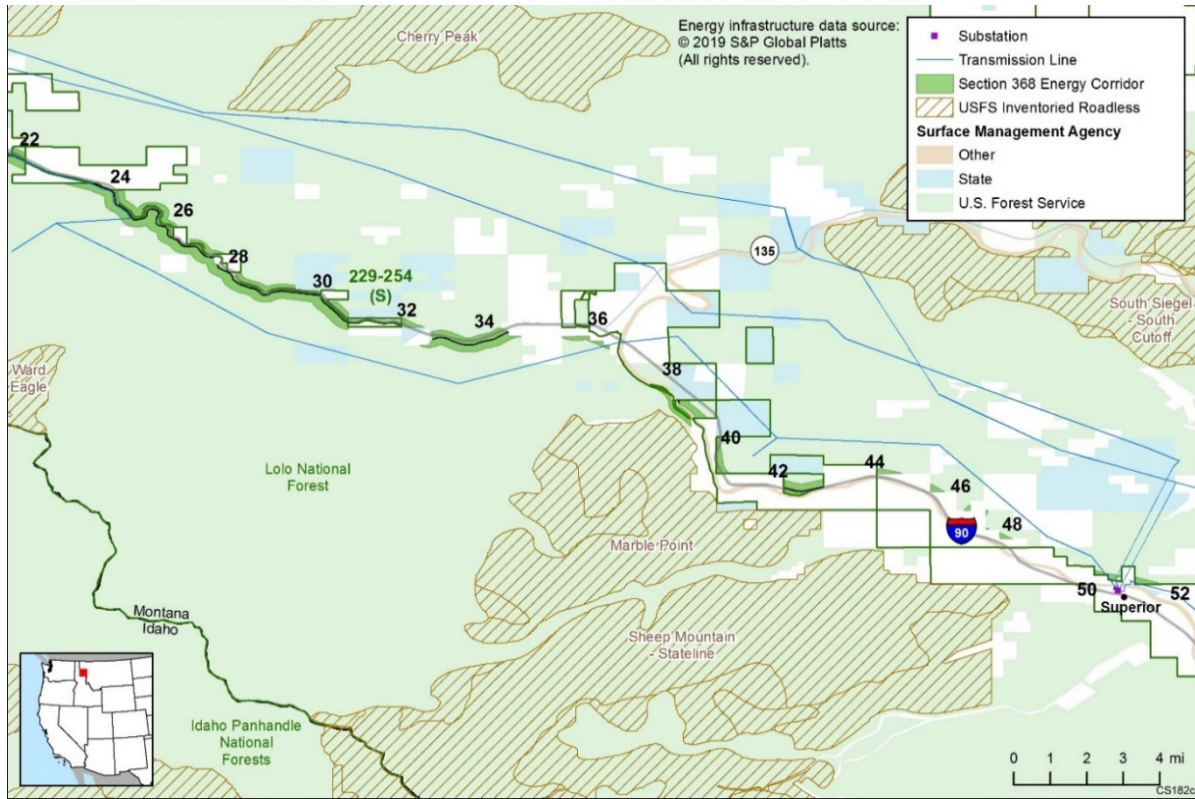


Figure 3.5-54-b. Corridor 229-254(S), as designated

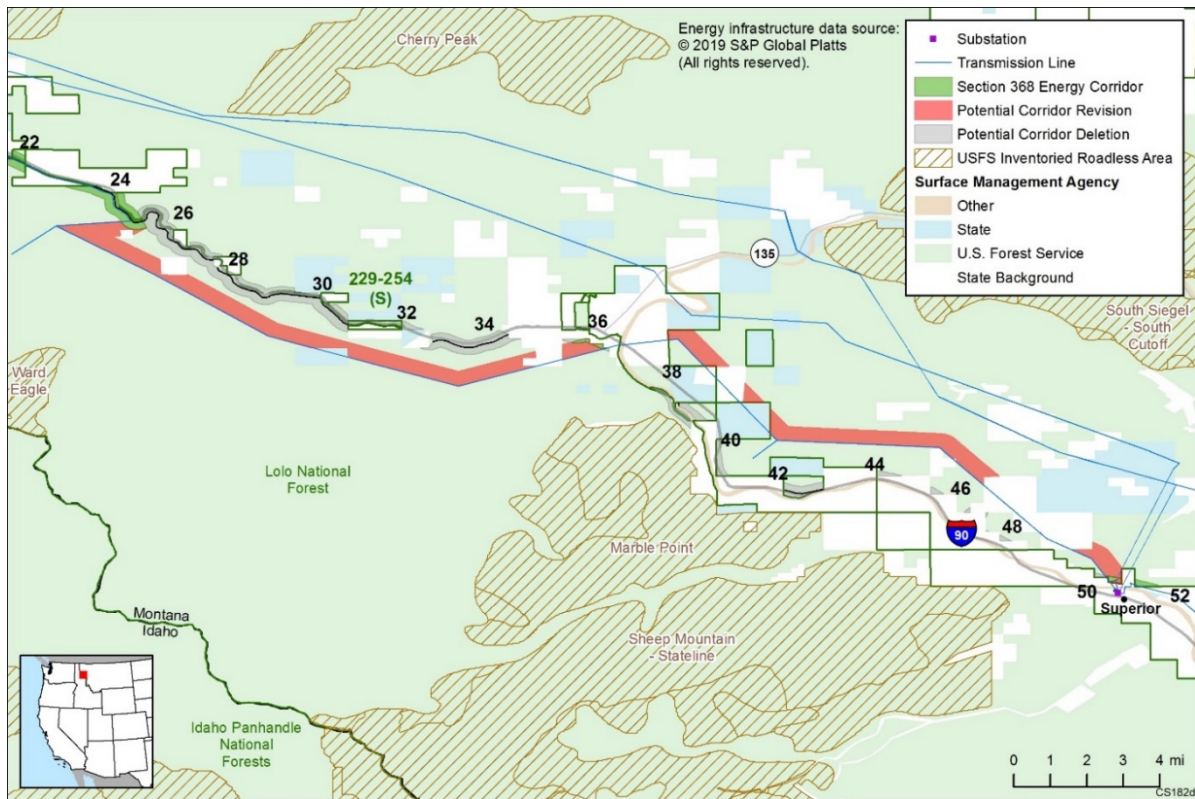


Figure 3.5-54c. Potential Revision to Corridor 229-254(S)

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 229-254(S), specific issues that would be addressed through potential IOP revisions or additions include:

- The Wonderful Peak Roadless Area and the corridor are adjacent. Agencies could consider a coordination IOP related to Roadless Areas to help minimize conflicts with the Roadless Rule.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 229-254(S) which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 229-254 Coeur d’Alene to Boulder Corridor

Agency Jurisdictions

Bureau of Land Management

Butte Field Office
 Coeur d’Alene Field Office
 Missoula Field Office

Forest Service

Beaverhead-Deerlodge National Forest
 Lolo National Forest
 Idaho Panhandle National Forests

Idaho Counties

Kootenai County
 Shoshone County

Montana Counties

Broadwater County
 Granite County
 Jefferson County
 Mineral County
 Missoula County
 Powell County

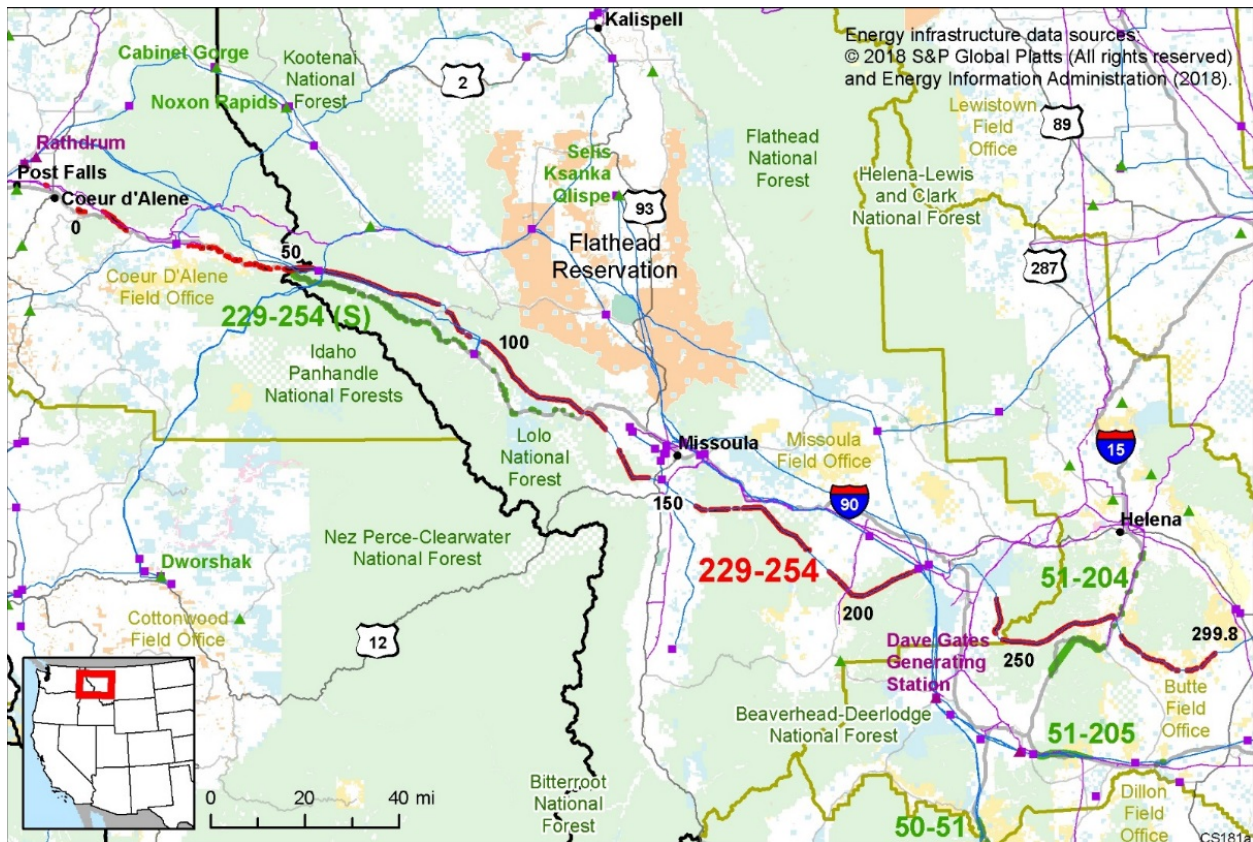


Figure 3.5-55. Corridor 229-254 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Butte RMP (2009)
Coeur d'Alene RMP (2007)
Garnet RMP (1986)
Beaverhead-Deerlodge National Forest LMP (2009)
Idaho Panhandle National Forests LMP (2015)
Lolo National Forest Plan (1986)

Corridor width: 2,000 ft from MP 0 to MP 51, 1,000 ft from MP 51 to MP 300.
Designated use: electric only.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

No specific potential revision is being suggested at this time, but consider shifting the corridor to include more federal land and shifting corridor to existing infrastructure to avoid residential areas within the town of Boulder (MP 265 to MP 278).

At the time of the review, the existing corridor location with the above potential changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing an interstate pathway for electrical transmission. The corridor is unlikely to accommodate additional infrastructure, other than low voltage transmission lines. Terrain and existing uses would require coordination and analysis. The corridor is collocated with existing infrastructure and in general, collocation is preferred to maximize utility, minimize potential impacts and to promote efficient use of landscape.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Corridor leads into residential and populated areas where local population opposes energy infrastructure (MP 265 to MP 278 is a residential subdivision near Boulder).
- In Montana, pipeline and transmission line ROWs cannot be located within an interstate transportation ROW. Corridors can cross highways but would require analysis and could be challenging.
- Difficult terrain in the area for large transmission lines.
- Reliability concerns-the existing transmission line took the preferred location given the terrain, and there may not be enough capacity for additional energy infrastructure.
- Clearance required for pipelines is 50 feet on either side of pipeline.

- Improved coordination with railroad companies – in some areas of the United States they are installing transmission lines within railroad ROWs, however, there could be additional fees and higher costs may drive energy developers to other locations.
- Early engagement with local government at project-specific level.
- Consider residential areas. Look to GIS and CADASTRAL data.
- Given the mountainous terrain in this area, there will be a need for access roads. There are concerns about the effect that might have on roadless areas. Buffers should be added outside of the corridors or access roads should be constructed prior to development within the corridor.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 229-254, specific issues that would be addressed through potential IOP revisions or additions include:

- The Silver King Roadless Area and the corridor intersect. Agencies could consider a coordination IOP related to Roadless Areas to help minimize conflicts with the Roadless Rule.
- The Continental Divide NST and the corridor intersect, while the Lewis and Clark NHT is located on private lands between MP 146 and 148. The logical extension of the corridor between the designated corridor segments would cross and could potentially impact the Lewis and Clark NHT. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 229-254 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 230-248 Warm Springs Corridor

Agency Jurisdictions

Bureau of Land Management
Cascades Field Office

Forest Service

Mt. Hood National Forest

Oregon Counties

Clackamas County
Wasco County

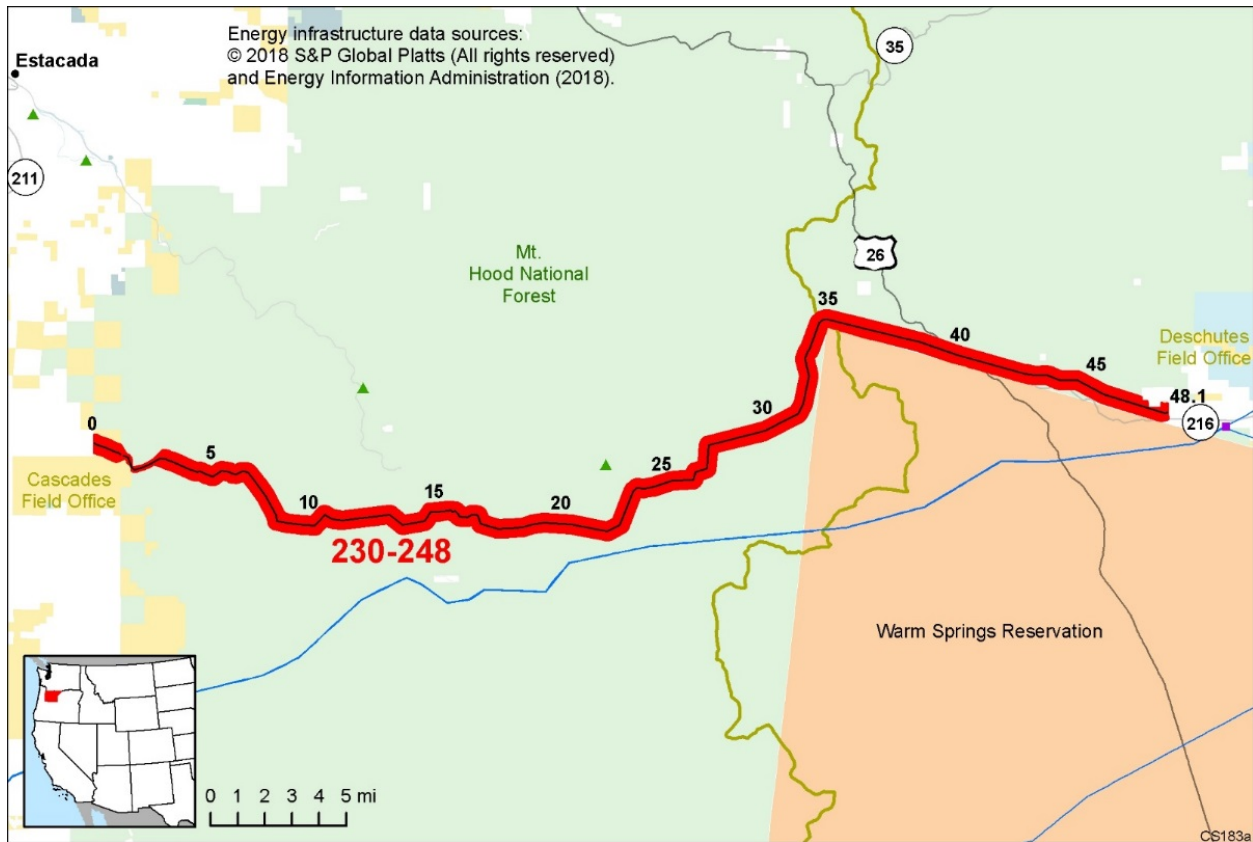


Figure 3.5-56. Corridor 230-248 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Northwestern and Coastal Oregon ROD/RMP (2016)
Mt. Hood National Forest LMP (1990)

Corridor width: variable widths ranging from 145 ft to 3,500 ft.
Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

The corridor faces numerous challenges including river crossings, terrain and stability concerns, and it is not collocated with existing infrastructure. During future land use planning, the Agencies should consider alternate routes that follow existing infrastructure while considering energy need and demand in the area. However, deleting the corridor is not recommended since the corridor does provide an east-west pathway across the Cascades through Mt Hood National Forest where energy infrastructure siting can be challenging. If a more preferred route is identified and designated in the future during land use planning, this corridor can be considered for deletion at that time.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Environmental concerns: wilderness designations and ACECs on either side of corridor, Pacific Crest NST crossing affects all routes in this vicinity, WSR crossings, Northern Spotted Owl habitat, and the new White River wolf pack in the area.
- Improved engagement with tribes since the east end of the corridor borders the Warm Springs Reservation.
- Concerns about river crossings and terrain and feasibility of pipeline development (underground is not technologically feasible; safety concerns with above-ground— periodic heavy flooding occurs and could wash away pipeline).
- Need to analyze energy need/demand in the area. Demand is generally more south towards the Ruby pipeline and the California market as well as southwest towards Portland.
- Corridor was designated to follow the route of the proposed Palomar natural gas pipeline which was never built due to concerns including Fish Creek crossing, unstable ground issues, private lands, and terminal concerns.
- The Trail West Pipeline has been proposed to move to move gas in an east-to-west direction from central Oregon to the I-5 corridor near Molalla, Oregon. The proposed pipeline could be located within Corridor 230-248 and could be used to export gas to China.
- In the past, energy companies have not wanted to collocate with highway corridor (Highway 26).
- Consider collocating new underground pipelines or transmission lines with the existing transmission lines to the south, though this might require a wider corridor. Support for collocation which results in less disturbance/impact on resource areas.
 - Cascade Crossing project near the Bonneville Power Administration route.
- Corridor revisions need to consider forest land allocations (late successional reserves and Northwest Forest Plans).

- Development within the corridor conflicts with the Mt. Hood National Forest Land and Resource Management Plan.
- New fossil fuel infrastructure poses major risks to public safety and natural resources due to potential pipeline leaks, ruptures, spills and burns.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 230-248, specific issues that would be addressed through potential IOP revisions or additions include:

- The Pacific Crest NST and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- MTR-IR and the corridor intersect. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 230-248 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 244-245 Lester to Easton Corridor

Agency Jurisdictions

Forest Service

Mt. Baker-Snoqualmie National Forest
Okanogan-Wenatchee National Forest

Washington Counties

King County
Kittitas County

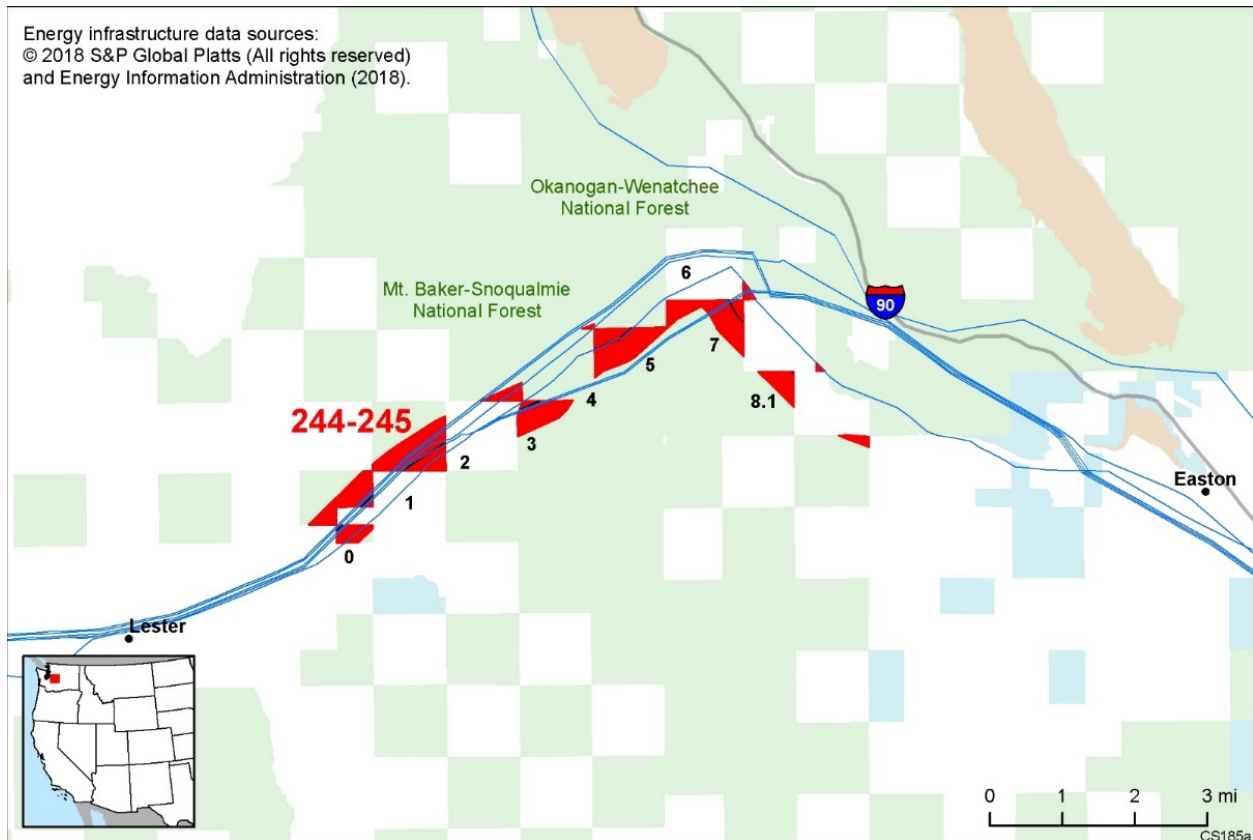


Figure 3.5-57. Corridor 244-245 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Mt. Baker-Snoqualmie National Forest LMP (1990)
Wenatchee National Forest LMP (1990)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- The Agencies could suggest collocating future development closely with the existing infrastructure to avoid the steep topography and water quality concerns on either side of the corridor.
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Consider adding lands acquired after 2009 to the designated corridor in future land use planning.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a path for transmitting generated energy from eastern Washington to the Puget Sound metropolitan area. Collocating future development closely with existing infrastructure would minimize concerns regarding steep topography and river water quality concerns within the Green River Municipal Watershed while maintaining a preferred route for potential future energy development collocated with existing infrastructure. Options to shift the corridor are limited because of the checkerboard pattern of USFS-administered lands in the area.

In addition to the revisions identified above, the following concerns were identified during the stakeholder workshops and should be considered during any land use planning revisions that would affect the corridor:

- Consider USFS allocations in this area with respect to old growth forests and timber.
- Water quality-Green River Municipal Watershed for city of Tacoma –road maintenance can impact water quality by adding sediment.
- Old growth forest late successional reserves are not within corridor but would need to be considered if corridor is widened.
- Pacific Crest Trail is already impacted by existing transmission lines.
- Corridor has noxious weeds/invasive plant issues. The 2015 USFS EIS requires that project proponents replace weeds with low height pollinator-friendly species; maintain vegetation in ROW.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 244-245, specific issues that would be addressed through potential IOP revisions or additions include:

- The Pacific Crest NST and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- MTR-VR and the corridor intersect. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 244-245 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 250-251 Baker City to Ontario Corridor

Agency Jurisdictions

Bureau of Land Management

Baker Field Office
Malheur Field Office

Oregon Counties

Baker County
Malheur County

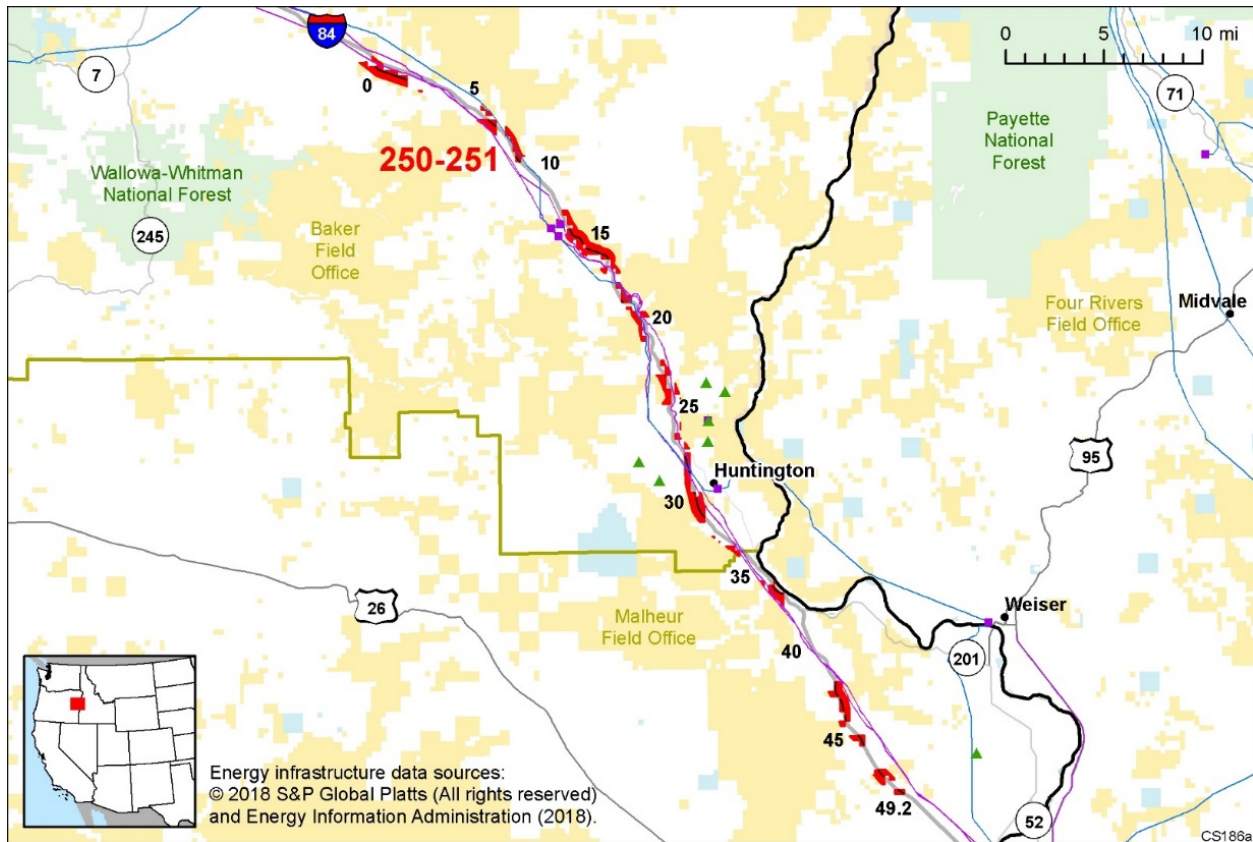


Figure 3.5-58. Corridor 250-251 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

Baker RMP (1989)
Southeastern Oregon RMP and ROD (2002)
Oregon GRSG ARMPA (2019)

Corridor width: 3,500 ft.

Designated use: multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- Implement minor adjustments to avoid environmentally sensitive areas.

From MP 18 to MP 28, shift corridor slightly to minimize impacts on the Oregon NHT.

At the time of the review, the existing corridor location with the above changes is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a pathway for energy transport in northeast Oregon. The potential minor revisions would minimize impacts on the Oregon NHT and Snake River-Mormon Basin BLM Back Country Byway to the greatest extent possible while maintaining a preferred route for potential future energy development collocated with existing infrastructure (i.e., 138-kV transmission line).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 250-251, specific issues that would be addressed through potential IOP revisions or additions include:

- The Oregon NHT and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- MTR-VR and the corridor intersect. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 250-251 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Corridor 261-262 Mount Shasta Corridor

Agency Jurisdictions

Bureau of Land Management
Redding Field Office

Forest Service

Klamath National Forest
Shasta-Trinity National Forest

California Counties

Shasta County
Siskiyou County

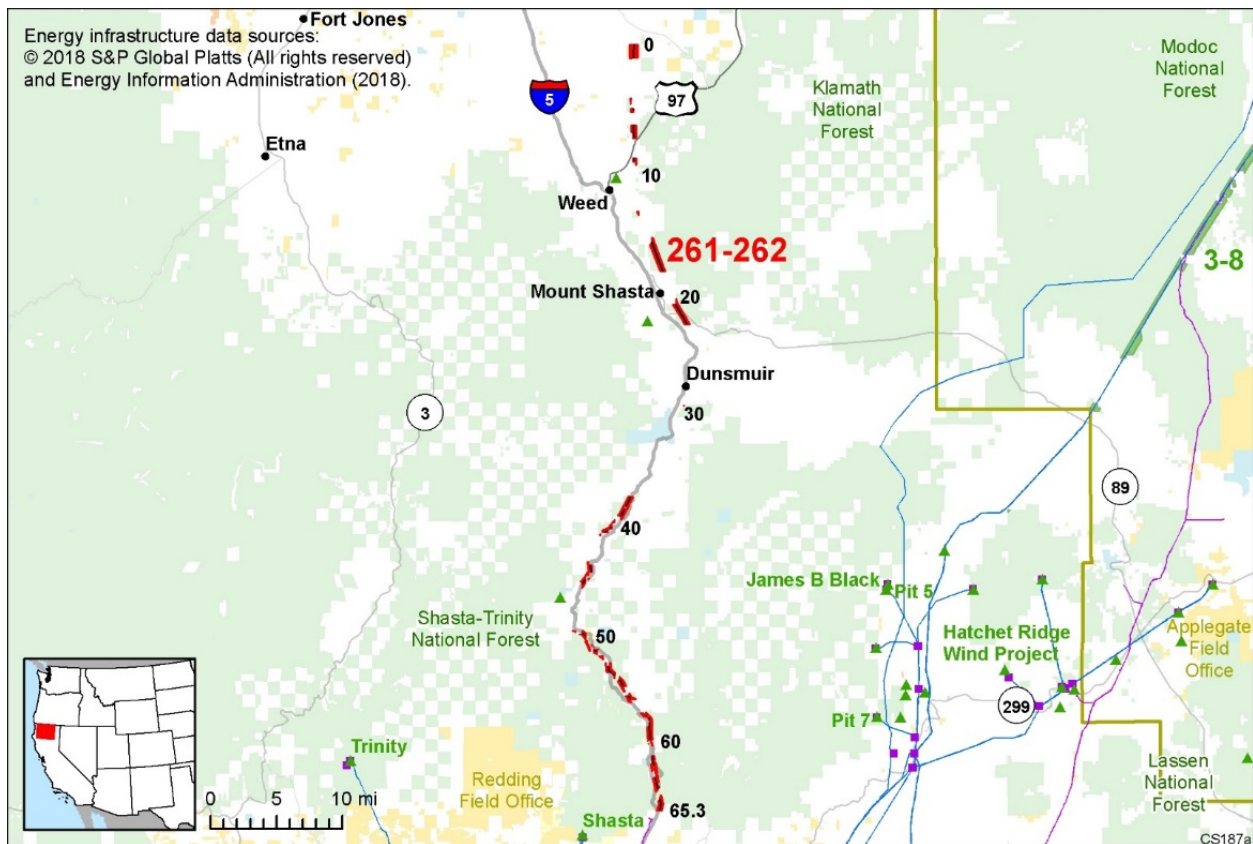


Figure 3.5-59. Corridor 261-262 and nearby electric transmission lines and pipelines (subject corridor in red)

Land and Resource Management Plans

- Redding RMP (1993)
- Klamath National Forest LMP (1995)
- Shasta-Trinity National Forest LMP (1995)

Corridor width: 2,000 ft in Redding Field Office and Klamath National Forest, remainder 3,500 ft.
Designated use: electric only in Redding Field Office and Shasta-Trinity National Forest, remainder multi-modal for electric transmission and pipelines.

Potential Corridor Enhancements Summary and Rationale

- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build-out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

At the time of the review, the existing corridor location is considered to be the best balance in meeting the siting principles. The corridor promotes efficient use of the landscape by providing a north-south pathway through Shasta National Forest along Interstate 5 in California. The corridor appears to best meet the siting principles as it is collocated with existing infrastructure (i.e., 69- and 115-kV transmission lines).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 261-262, specific issues that would be addressed through potential IOP revisions or additions include:

- The Dog Creek Roadless Area and the corridor are adjacent. Agencies could consider a coordination IOP related to Roadless Areas to help minimize conflicts with the Roadless Rule.
- MTR-Slow-speed route and VR intersect the corridor. Adherence to the existing IOP regarding coordination with DoD would be required. Agencies considering a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Corridor Abstract

Comprehensive background information and the Agency's review and analysis of the existing corridor can be located in Corridor Abstract 261-262 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

Potential Energy Corridor Additions

The summaries for each of the six potential energy corridor additions in Regions 4, 5, and 6 include the route for the potential energy corridor addition, corridor-specific discussion of existing use and opportunity for future development, and the rationale for how the corridor meets the siting principles identified in the Settlement Agreement.

Potential Energy Corridor Addition—Wamsutter-Powder Rim Corridor

Agency Jurisdictions

Bureau of Land Management

Rawlins Field Office

Wyoming Counties

Rawlins County

Sweetwater County

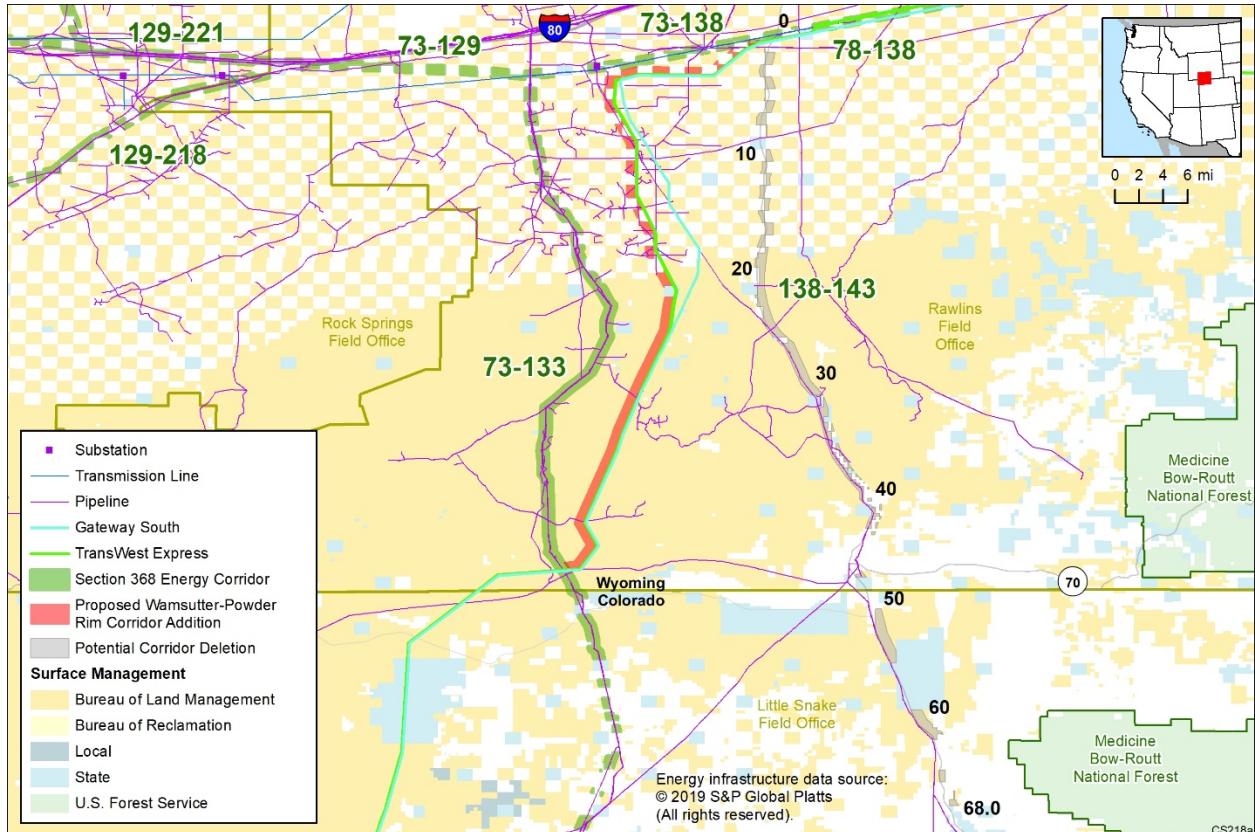


Figure 3.6-1. Wamsutter-Powder Rim Corridor Potential Addition

Land and Resource Management Plan

Rawlins RMP (2008)

Wyoming GRSG ARMPA (2019)

Suggested Energy Corridor width: 3,500 ft.

Suggested Energy Corridor designated use: electric-only.

Summary and Rationale for Potential Corridor Addition

The potential energy corridor addition was developed through the energy corridor regional reviews (Figure 3.6-1). The corridor would provide a north-south pathway from Wyoming through Colorado on federally administered land and would follow the recently authorized TransWest Express 500-kV transmission line. The corridor was designated a 3,500-foot-wide north-south multi-modal utility corridor in the Record of Decision for the TransWest Express Transmission Project along the Sweetwater/Carbon County, Wyoming line.

There are three north-south corridors in the Rawlins, Wyoming to Craig, Colorado vicinity: (1) Wamsutter-Powder Rim (local utility corridor) is designated multi-modal along the TransWest Express authorized route; (2) Corridor 73-133 is designated underground-only and follows pipelines along its entire route; and (3) Corridor 138-143 follows Highway 789 along its entire route and contains a pipeline as well. There is some redundancy in having three energy corridors following the same general pathway, and the Agencies have identified the Wamsutter-Powder Rim corridor as a preferred pathway for electrical transmission in the area.

The potential corridor addition would meet the siting principles identified in the Settlement Agreement; specifically, the potential corridor addition would:

- maximize utility by strengthening the electric power grid that serves the Western United States from south-central Wyoming to southern Nevada;
- minimize potential impacts by collocating along planned infrastructure (600-kV TransWest Express transmission line). The Agencies also suggest deleting Corridor 138-143 because it does not contain existing or planned transmission lines and there are habitat concerns in the area, including mule deer migration. The Wamsutter-Powder Rim corridor contains fewer conflicts and potential habitat concerns;
- promote efficient use of the landscape by providing a north-south pathway for electricity transmission through from Wyoming to Colorado. Designating the corridor as electric-only minimizes the need for separation integrity required for collocation with pipelines; and
- provide connectivity to renewable energy generation to the maximum extent possible by facilitating the transmission of renewable energy, including wind energy from Wyoming to the Desert Southwest Region and solar or other renewable energy from the Desert Southwest to the Rocky Mountain Region.

If designated through the Agency's land use planning process, an Energy Corridor Management Plan should be developed as part of the land use planning designation process to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and addition to IOPs are discussed in Chapter 3, Section 3.4. For the potential energy corridor addition, specific issues that would be addressed through proposed IOP revisions or additions include:

- The Four Trails Feasibility Study Trail and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Potential Energy Corridor Addition—Gateway West Corridor

Agency Jurisdictions

Bureau of Land Management

Rock Springs Field Office
Rawlins Field Office

Wyoming Counties

Sweetwater County
Lincoln County

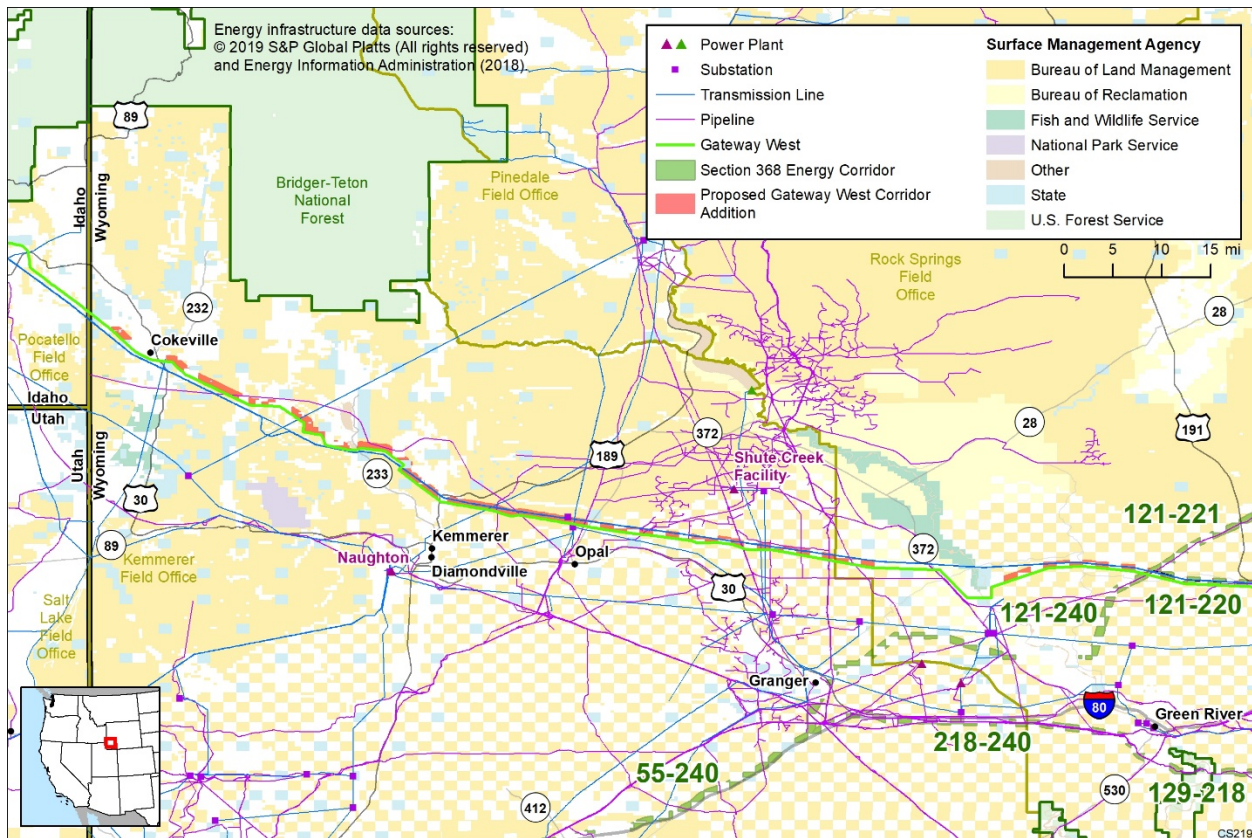


Figure 3.6-2. Gateway West Corridor Potential Addition

Land and Resource Management Plan

Rawlins RMP (2008)
Green River RMP (1997)
Wyoming GRSG ARMPA (2019)

Suggested Energy Corridor width: 3,500 ft.
Suggested Energy Corridor designated use: multi-modal.

Summary and Rationale for Potential Corridor Addition

The potential energy corridor addition was developed through the energy corridor regional reviews (Figure 3.6-2). The corridor would provide an east-west pathway from Wyoming into Idaho on federally administered land and would follow the recently authorized Gateway West 500-kV transmission line. The potential corridor addition along Gateway West would locate the corridor where demand for energy is high. The Agencies should incorporate lessons learned from the Gateway West project. The rationale for transmission line alignment could help inform the location of Section 368 energy corridors.

The potential corridor addition would meet the siting principles identified in the Settlement Agreement; specifically, the potential corridor addition would:

- maximize utility by providing strength and reliability to the region's transmission system across Wyoming and Idaho along planned infrastructure;
- minimize potential impacts on visual resources and GRS habitat by collocating along planned infrastructure;
- promote efficient use of the landscape by connecting to other Section 368 energy corridors and providing an east-west pathway for electricity transmission through from Wyoming to Idaho; and
- provide connectivity to renewable energy generation to the maximum extent possible by delivering power from existing and future electric resources (including renewable resources such as wind energy). Solar energy development in Lincoln County will be in proximity to the Gateway West transmission line, providing additional connectivity to renewable energy development.

If designated through the Agency's land use planning process, an Energy Corridor Management Plan should be developed as part of the land use planning designation process to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and addition to IOPs are discussed in Chapter 3, Section 3.4. For the potential energy corridor addition, specific issues that would be addressed through proposed IOP revisions or additions include:

- The corridor intersects the Oregon NHT, California NHT, and the Four Trails Feasibility Study Trail. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.

Potential Energy Corridor Addition—Wagontire Mountain Corridor

Agency Jurisdictions

Bureau of Land Management

Three Rivers Field Office
Lakeview Field Office

United States Forest Service

Fremont-Winema National Forests

Oregon Counties

Harney County
Lake County

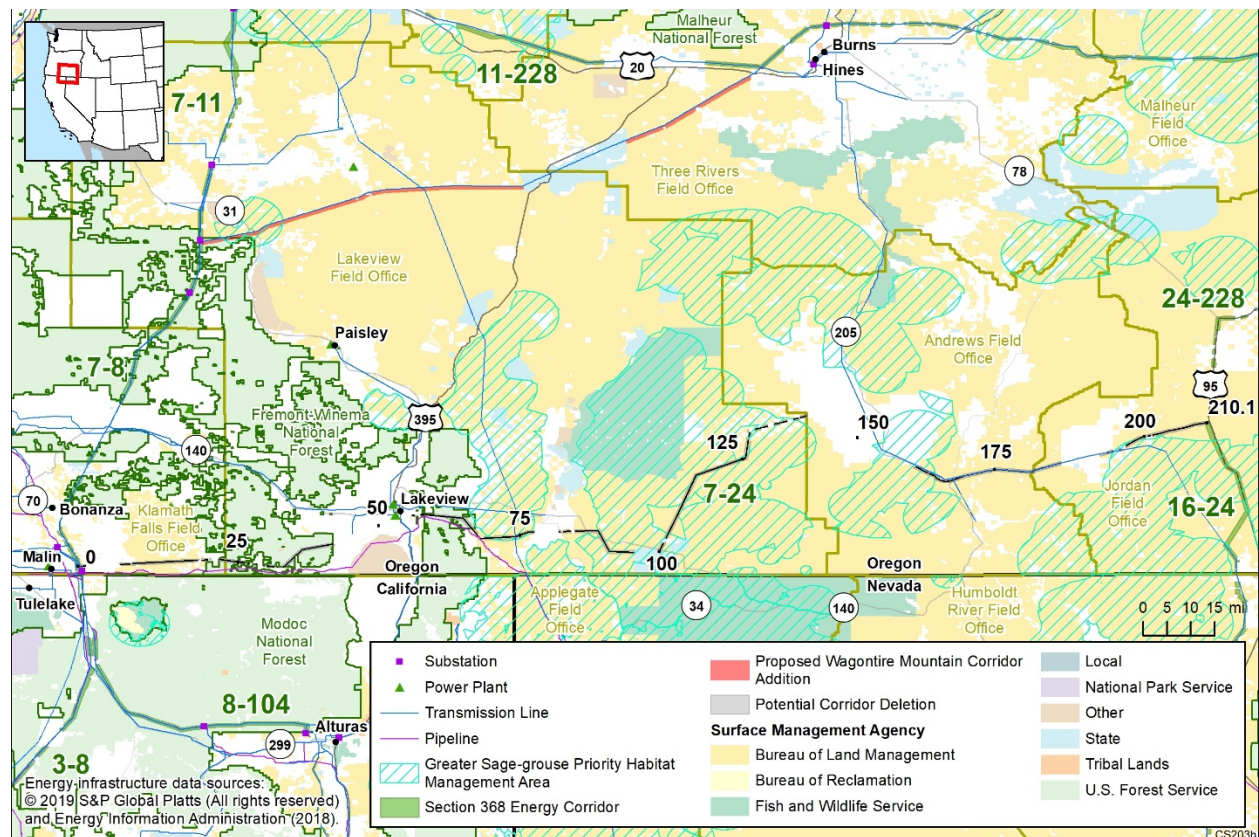


Figure 3.6-3. Wagontire Mountain Corridor Potential Addition

Land and Resource Management Plan

- Lakeview ROD/RMP (2003)
- Three Rivers ROD/RMP (1992)
- Fremont-Winema National Forest LRMP (1990)
- Oregon GRSG ARMPA (2019)

Suggested Energy Corridor width: 3,500 ft.

Suggested Energy Corridor designated use: multi-modal for electric transmission and pipelines.

Summary and Rationale for Potential Corridor Addition

The potential energy corridor addition was developed through the energy corridor regional reviews (Figure 3.6-3). The corridor would provide a northeast-southwest pathway from Burns, Oregon to connect to Corridor 7-11 along an existing 500-kV transmission line. There is increasing renewable energy potential near Wagon Tire Mountain (south of Corridor 11-228 and east of Corridor 7-11) but there is a lack of transmission infrastructure to connect the energy resources to demand centers in California. The current location of Corridor 11-228 does not meet transmission needs for wind energy in the Wagon Tire Mountain area.

The potential corridor addition would meet the siting principles identified in the Settlement Agreement; specifically, the potential corridor addition would:

- maximize utility by locating the corridor along a crucial pathway, connecting renewable energy sources to load centers in California;
- minimize potential impacts by collocating along existing infrastructure (500-kV PacifiCorp transmission line). The Agencies also suggest deleting Corridor 7-24 because it does not contain existing or planned transmission lines and there are concerns within the corridor, including lands with wilderness characteristics, GRS habitat and potential impacts on visual and cultural resources. The Wagon Tire Mountain potential corridor addition contains fewer conflicts and is collocated with an existing transmission line;
- promote efficient use of the landscape connecting multiple Section 368 energy corridors to create a continuous corridor network in Oregon; and
- provide connectivity to renewable energy generation to the maximum extent possible by siting a corridor near Wagon Tire Mountain where renewable energy potential is high (wind, geothermal, solar).

If designated through the Agency's land use planning process, an Energy Corridor Management Plan should be developed as part of the land use planning designation process to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

Interagency Operating Procedures (IOPs)

Revisions, deletions, and addition to IOPs are discussed in Chapter 3, Section 3.4. For the potential energy corridor addition, specific issues that would be addressed through proposed IOP revisions or additions include:

- The Four Trails Feasibility Study Trail and the corridor intersect. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.
- Lands with undetermined status for wilderness characteristics intersect the corridor. Agencies could consider an IOP to provide guidance on the review process for applications within corridors with incomplete inventories. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.

Potential Energy Corridor Addition—Southern Idaho Corridor

Agency Jurisdictions

Bureau of Land Management

Owyhee Field Office
 Jarbidge Field Office
 Burley Field Office
 Pocatello Field Office

Wyoming Counties

Cassia County
 Power County

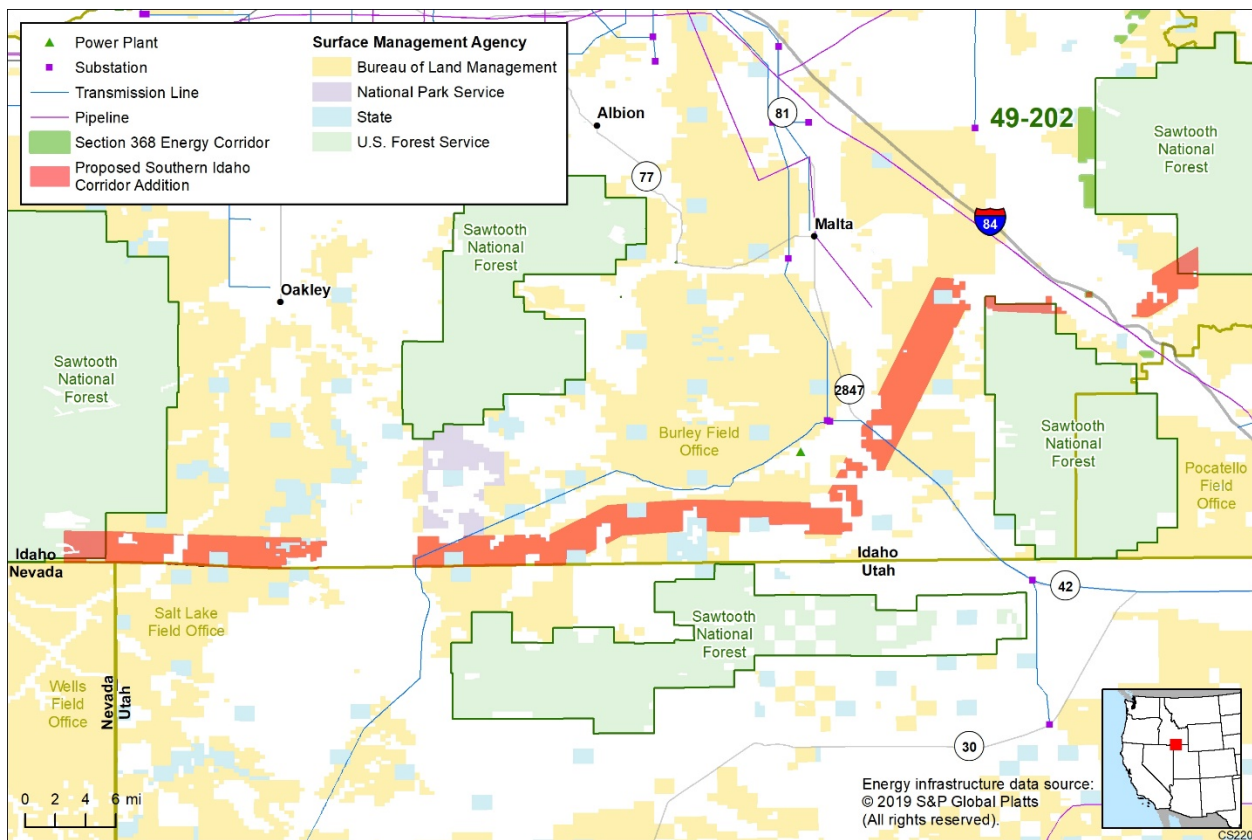


Figure 3.6-4. Southern Idaho Corridor Potential Addition

Land and Resource Management Plan

- Owyhee RMP (1999)
- Bruneau MFP (1983)
- Jarbidge RMP (2015)
- Twin Falls MFP (1982)
- Cassia MFP (1985)
- Pocatello RMP (2012)
- Idaho GRSG ARMPA (2019)

Suggested Energy Corridor width: 3,500 ft.
Suggested Energy Corridor designated use: multi-modal.

Summary and Rationale for Potential Corridor Addition

The potential energy corridor addition was developed through the energy corridor regional reviews (Figure 3.6-1). The corridor would provide an east-west pathway through southern Idaho on federally administered land. There has been coordination among the counties in southern Idaho for a potential corridor addition. Both Cassia County and Power County oppose new Section 368 energy corridor development located where the corridor would traverse corridor gaps along agricultural lands.

Power County's Transmission Line Ordinance outlines parameters for transmission lines located within the county. Parameters include: alternatives on public land should be preferred; transmission lines should not be located on irrigated farmland, and if a transmission line is sought on working agricultural land it must be placed underground, unless project proponents have the approval of the landowner, adjacent landowners, landowners within 1,500 ft of the transmission lines, the Power County planning and zoning commission, and the board of county commissioners. In its comprehensive plan, Cassia County has identified an electrical transmission corridor overlay zone (EO) as the County's preferred route for transmission lines. Transmission lines sited outside of the EO must adhere to performance standards before construction and development of future transmission lines would be authorized. The EO runs east-west near the southern border of Cassia County and along the border between Idaho and Utah.

The potential corridor addition would maximize utility by providing an east-west route through southern Idaho that has local government consensus. However, there is no existing infrastructure along this potential route and the area contains PHMA.

If designated through the Agency's land use planning process, an Energy Corridor Management Plan should be developed as part of the land use planning designation process to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).

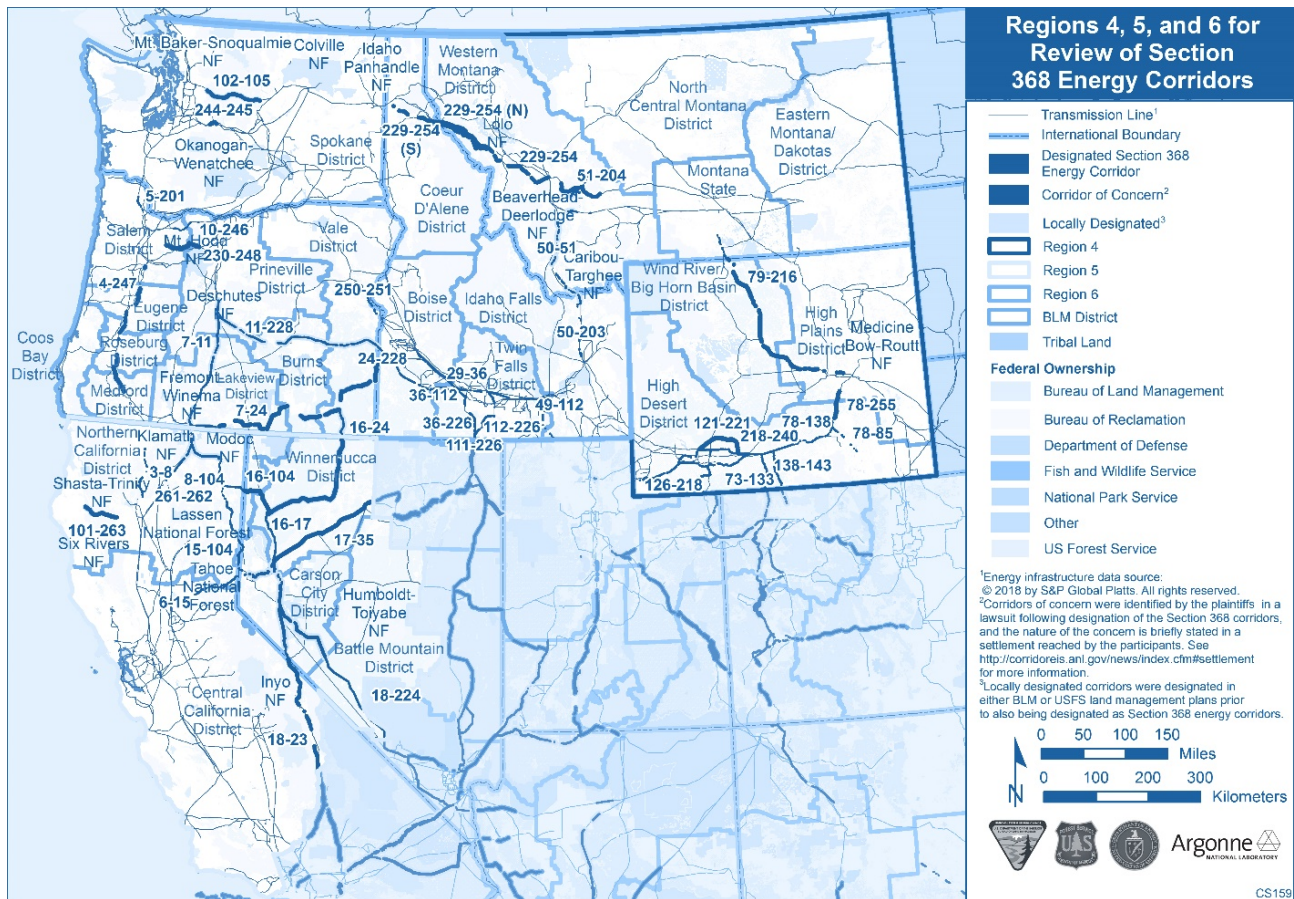


November 2020

Section 368 Energy Corridor Review

VOLUME 2 — REGIONS 4, 5, and 6

APPENDICES: SUPPORTING INFORMATION



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Appendix A: Existing Energy Infrastructure, Planned or Pending Projects, and Potential for Future Development

Corridor and Location	Existing Energy Infrastructure	Planned or Future Energy Development Potential	Potential Additional Energy Capacity
3-8 R5 CA	Two electric transmission lines extend the full length of the corridor. A natural gas pipeline is within and adjacent to the corridor from MP 22 to MP 58.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
4-247 R6 OR	The corridor is centered on an electric transmission line for its entire length. One to five additional electric transmission lines are also within and adjacent to the corridor at several locations from MP 0 to MP 142. A natural gas pipeline is within and adjacent to the corridor from MP 58 to MP 70 and from MP 139 to MP 142.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
5-201 R6 OR	The corridor is centered on an electric transmission line for its entire length.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
6-15 R5 CA & NV	Three electric transmission lines are within and adjacent to the corridor from MP 0 to MP 41 and one continues the full length of the corridor. A refined product pipeline is within and adjacent to the corridor from MP 19 to MP 40.	An electric transmission line is planned to generally follow the entire length of the corridor.	Agencies anticipate the corridor could support additional projects.
7-8 R6 OR & CA	Four electric transmission lines are within and adjacent to the full length of the corridor. One electric transmission line is within the corridor from MP 0 to MP 2. A natural gas pipeline is within and adjacent to the corridor from MP 3 to MP 4.	A planned electric transmission line would be adjacent to the full length of the corridor.	Agencies anticipate the corridor could support additional projects in OR, but the 500 ft corridor width in CA could limit infrastructure placement.
7-11 R6 OR	Three electric transmission lines are within and adjacent to the corridor from MP 0 to MP 74; four from MP 74 to MP 81; five from MP 81 to MP 91; three from MP 91 to MP 140; and five from MP 140 to MP 141.	An electric transmission line is planned within the corridor from MP 4 to MP 39. A planned electric transmission line would be within and adjacent to the corridor from MP 0 to MP 20.	Agencies anticipate the corridor could support additional projects.

Corridor and Location	Existing Energy Infrastructure	Planned or Future Energy Development Potential	Potential Additional Energy Capacity
7-24 R6 OR	A natural gas pipeline generally follows the corridor from MP 0 to MP 69.	A planned electric transmission line would generally follow the full length of the corridor.	Agencies anticipate the corridor could support additional projects.
8-104 R5 CA	An electric transmission line extends the full length of the corridor. A natural gas pipeline is within the corridor from MP 0 to MP 31.	An electric transmission line is planned to use the corridor from MP 54 to MP 84.	Agencies anticipate the corridor could support additional projects from MP 0 to MP 49, but the remainder of the corridor, from MP 49 to MP 84 is limited because of the 500 ft width.
10-246 R6 OR	Four electric transmission lines are within the corridor for its entire length.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
11-103 R6 OR	Four electric transmission lines are within and adjacent to the corridor for its entire length.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
11-228 R6 OR & ID	The corridor is centered on an electric transmission line for its entire length.	A planned electric transmission line would be within and adjacent to the corridor from MP 159 to MP 221 and an additional planned electric transmission line would be within and adjacent to the corridor from MP 207 to MP 221.	Agencies anticipate the corridor could support additional projects.
15-17 R5 NV	The corridor is occupied by two electric transmission lines from MP 0 to MP 16, by four electric transmission lines from MP 16 to MP 20, by two electric transmission lines from MP 20 to MP 29, and by two electric transmission lines from MP 35 to MP 40. The corridor is occupied by two natural gas pipelines from MP 15 to MP 27 and by one natural gas pipeline from MP 27 to MP 40.	An electric transmission line is planned to generally follow the corridor from MP 0 to MP 28.	Agencies anticipate the corridor could support additional projects.
15-104 R5 NV & CA	An electric transmission line is within or adjacent to the entire length of the corridor.	An electric transmission line is planned within or adjacent to the entire length of the corridor.	Agencies anticipate the corridor could support additional projects from MP 0 to MP 107, but the remainder of the corridor, from MP 107 to MP 114 is limited because of the 500 ft width.

Corridor and Location	Existing Energy Infrastructure	Planned or Future Energy Development Potential	Potential Additional Energy Capacity
16-17 R5 NV	An electric transmission line is within and adjacent to the full length of the corridor and a second electric transmission line is within the corridor from MP 15 to MP 22.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
16-24 R5 & R6 NV & OR	An electric transmission line is within and adjacent to the corridor from MP 11 to MP 56 and from MP 100 to MP 167.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
16-104 R5 NV & CA	An electric transmission line is within and adjacent to the corridor from MP 0 to MP 31.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
17-18 R5 NV	An electric transmission line is within the entire length of the corridor. An electric transmission line is within and adjacent to the corridor from MP 11 to MP 28 and from MP 52 to 58.	An electric transmission line is planned within the corridor from MP 52 to MP 58.	Agencies anticipate the corridor could support additional projects.
17-35 R5 CA & NV	Two electric transmission lines are within and adjacent to the corridor from MP 0 to MP 143 which is the R5 portion of the corridor. An electric transmission line generally follows the corridor from MP 143 to MP 202 and from MP 227 to MP 311, within the R3 portion of the corridor. A natural gas pipeline is within and adjacent to the corridor from MP 108 to MP 113 and from MP 209 to MP 244.	An electric transmission line is planned to generally follow the corridor from MP 68 to MP 128 and two electric transmission line are planned to generally follow the corridor from MP 208 to MP 300.	Agencies anticipate the corridor could support additional projects.
18-23 R5 & R1 NV & CA	The corridor is the general pathway for a 1,000 kV DC electric transmission line from The Dalles, OR to southern CA. Multiple other electric transmission lines use the corridor in various locations.	An electric transmission line is planned to use the corridor from MP 0 to MP 17. No additional projects are currently proposed.	With the exception of the portion of the corridor from MP 0 to MP 49 and from MP 212 to MP 239, the corridor has very limited potential for additional projects.
18-224 R5 & R1 NV	The corridor is occupied by an electric transmission line from MP 0 to MP 86 and from MP 225 to MP 234.	An electric transmission line is planned to use the corridor from MP 225 to MP 233.	Agencies anticipate the corridor could support additional projects.
24-228 R6 OR & ID	An electric transmission line is within and adjacent to the corridor from MP 42 to MP 95.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.

Corridor and Location	Existing Energy Infrastructure	Planned or Future Energy Development Potential	Potential Additional Energy Capacity
29-36 R6 ID	Multiple electric transmission lines are within and adjacent to the full length of the corridor. A natural gas pipeline generally follows the corridor from MP 15 to MP 63. A refined product pipeline is within and adjacent to the full length of the corridor.	One electric transmission line is planned within and adjacent to the corridor from MP 5 to MP 63 and another is planned within and adjacent to the corridor from MP 9 to MP 49. A natural gas pipeline generally following the corridor is planned from MP 15 to MP 63.	The potential for additional projects may be limited because of the density of existing and planned infrastructure within and adjacent to the corridor.
36-112 R6 ID	Multiple electric transmission lines are within and adjacent to the full length of the corridor.	One electric transmission line is planned that would extend within and adjacent to the full length of the corridor and another electric transmission line is planned to generally follow the corridor from MP 16 to MP 38.	Agencies anticipate the corridor could support additional projects.
36-226 R6 ID	An electric transmission line is within and adjacent to the full length of the corridor. A natural gas pipeline is within and adjacent to the corridor from MP 0 to MP 15. A refined product pipeline is within and adjacent to the corridor from MP 0 to MP 15.	Two electric transmission lines are planned to generally follow the corridor from MP 25 to MP 43. A natural gas pipeline is planned within and adjacent to the corridor from MP 0 to MP 15.	Agencies anticipate the corridor could support additional projects.
36-228 R6 ID	An electric transmission line is within and adjacent to the corridor from MP 89 to MP 106.9	Two electric transmission lines are planned to generally follow the full length of the corridor.	There is potential for additional projects to use the corridor.
49-112 R6 ID	Multiple electric transmission lines are within and adjacent to the corridor from MP 0 to MP 44 and one electric transmission line continues from MP 44 to MP 72.7.	Two electric transmission lines are planned that would generally follow the corridor from MP 0 to MP 18.	Agencies anticipate the corridor could support additional projects.
49-202 R6 ID	A refined product pipeline is within and adjacent to the corridor from MP 30 to MP 52.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
50-51 R6 MT	Two electric transmission lines are within and adjacent to the full length of the corridor and an additional electric transmission line extends from MP 25 to MP 39.	A planned electric transmission line generally follows the full length of the corridor.	Agencies anticipate the corridor could support additional projects.
50-203 R6 MT & ID	One to three electric transmission lines are within and adjacent to the corridor from MP 0 to MP 147.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.

Corridor and Location	Existing Energy Infrastructure	Planned or Future Energy Development Potential	Potential Additional Energy Capacity
51-204 R6 MT	Two electric transmission lines are within the corridor from MP 0 to MP 9 and two other electric transmission lines are within and adjacent to the corridor from MP 16 to MP 38. A natural gas pipeline is within and adjacent to the corridor from MP 16 to MP 38.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
51-205 R6 MT	Two electric transmission lines extend the full length of the corridor. A natural gas pipeline is within and adjacent to the corridor from MP 0 to MP 25.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
55-240 R4 WY	The corridor contains multiple natural gas, crude oil, and refined product pipelines from about MP 17 to MP 29. The corridor is also intersected by natural gas, crude oil, and refined product pipelines throughout its length and is intersected by two electric transmission lines.	No additional pipelines or transmission lines are currently proposed within the corridor.	Agencies anticipate the corridor could support additional projects.
73-129 R4 WY	Multiple natural gas, crude oil, and refined product pipelines are within or adjacent to the corridor from MP 8 to MP 14.	Additional pipelines are planned within the corridor near MP 13 and planned electric transmission lines as well as pipelines intersect the corridor in several locations.	Agencies anticipate the corridor could support additional projects.
73-133 R3 & 4 CO & WY	Multiple natural gas pipelines and a refined product pipeline are within or adjacent to the corridor from MP 0 to MP 83.	Two additional natural gas pipelines are planned within and adjacent to the Wyoming portion of the corridor from MP 0 to MP 46.	Agencies anticipate the corridor could support additional pipeline projects, however the corridor is designated underground only which would limit potential electric transmission.
73-138 R4 WY	The corridor is occupied by an electric transmission line and a refined product pipeline from MP 0 to MP 16. Several local natural gas pipelines and a crude oil pipeline intersect the corridor.	A planned natural gas and a planned refined product pipeline would intersect the corridor and two planned electric transmission lines would extend within or adjacent to the full length of the corridor.	Agencies anticipate the corridor could support additional projects.
78-85 R4 WY	The corridor is centered on two electric transmission lines for its full length and is intersected by electric transmission lines as well as crude oil and natural gas pipelines.	A planned electric transmission line and a planned natural gas pipeline would intersect the corridor.	Agencies anticipate the corridor could support additional projects.

Corridor and Location	Existing Energy Infrastructure	Planned or Future Energy Development Potential	Potential Additional Energy Capacity
78-138 R4 WY	The corridor is centered on an electric transmission line for its full length. Multiple natural gas, crude oil, and refined product pipelines are adjacent to the corridor with one refined product pipeline within the corridor from MP 73 to MP 80.	Four electric transmission lines are planned within or adjacent to the full length of the corridor. A refined product pipeline and a natural gas pipeline are planned to generally follow the corridor from MP 43 to MP 80.	The potential for projects to use the corridor in addition to those already planned may be limited, particularly if already planned projects locate within the corridor.
78-255 R4 WY	The corridor follows, and is mostly centered on, an electric transmission line for its entire length. An additional electric transmission line parallels the corridor from MP 15 to MP 42	One electric transmission line is planned within the corridor for its full length and a second electric transmission line is planned within the corridor from MP 0 to MP 41.	Agencies anticipate the corridor could support additional projects.
79-216 R4 WY & MT	One or two electric transmission lines are within or immediately adjacent to the corridor from MP 22 to MP 110, MP 118 to MP 126, MP 157 to MP 185, and MP 237 to MP 245. Multiple crude oil and natural gas pipelines are within or immediately adjacent to the corridor from MP 38 to MP 103, MP 123 to MP 185, MP 206 to MP 209, and MP 214 to MP 255.	A planned natural gas pipeline would cross the corridor from MP 242 to MP 245.	Agencies anticipate the corridor could support additional projects.
101-263 R5 CA	An electric transmission line is within the entire length of the corridor. A natural gas pipeline is within and adjacent to the entire length of the corridor.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
102-105 R6 WA	Three electric transmission lines are within and adjacent to the corridor throughout its length.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
112-226 R6 ID	The corridor is centered on an electric transmission line for its entire length.	An electric transmission line is planned within and adjacent to the corridor for its entire length. Two other electric transmission lines are planned within and adjacent to the corridor from MP 33 to MP 41 and another electric transmission line is planned within the corridor from MP 48 to MP 55.	Agencies anticipate the corridor could support additional projects.
121-220 R4 WY	Three electric transmission lines are centered within the corridor for its full length.	One electric transmission line is planned within the corridor for its full length.	Agencies anticipate the corridor could support additional transmission lines projects.

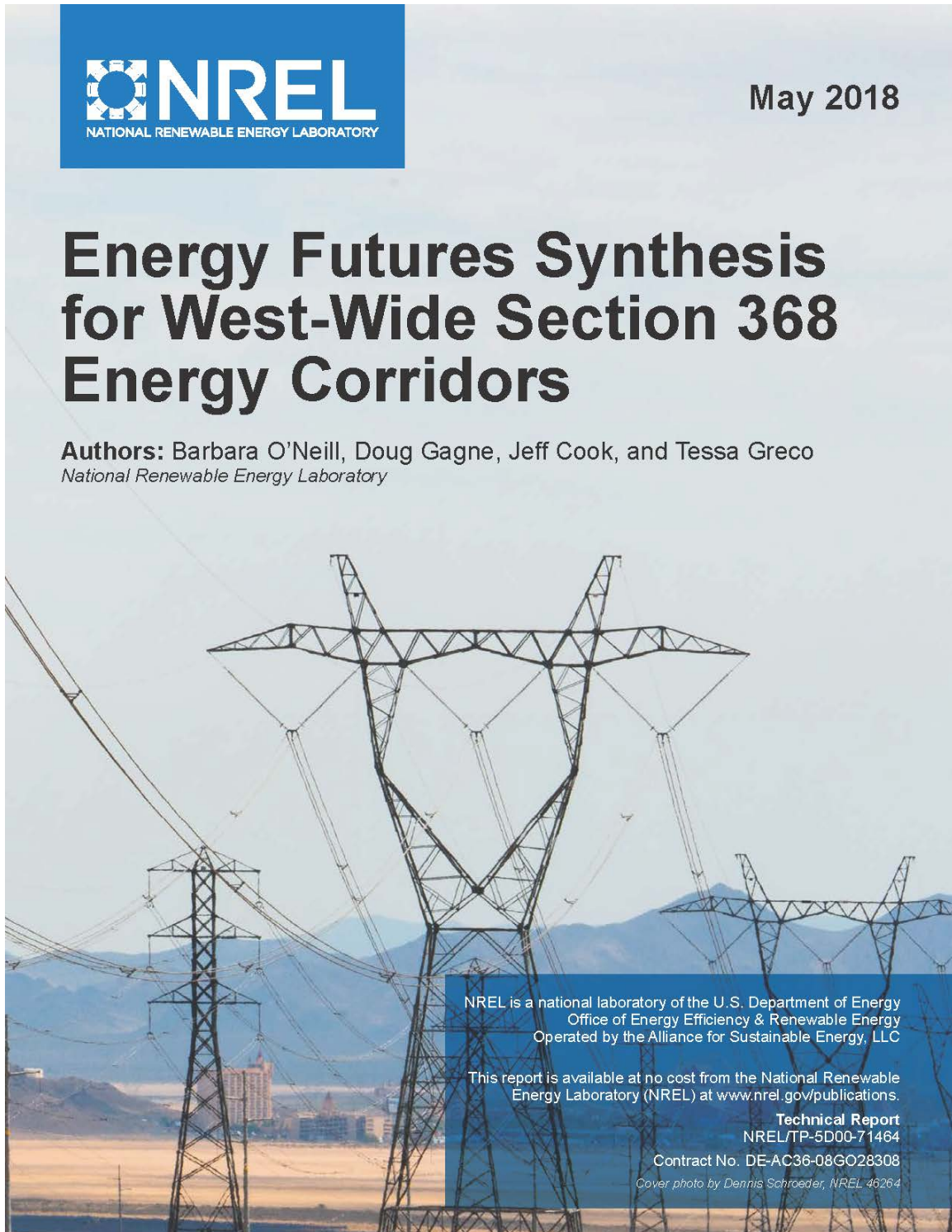
Corridor and Location	Existing Energy Infrastructure	Planned or Future Energy Development Potential	Potential Additional Energy Capacity
121-221 R4 WY	A crude oil pipeline is within the corridor from MP 0 to MP 32. Natural gas pipelines are within or adjacent to the corridor at MP 8, from MP 21 to MP 25, and from MP 44 to MP 63.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
121-240 R4 WY	Multiple electric transmission lines are adjacent to or intersect the corridor, but none is aligned within the corridor. A crude oil pipeline generally follows and occasionally crosses the corridor. Multiple natural gas pipelines are adjacent to or intersect the corridor, but none is aligned within the corridor. Multiple refined product pipelines intersect the corridor between MP 36 and MP 38.	A refined product pipeline is planned within the corridor from MP 0 to MP 4.	Agencies anticipate the corridor could support additional projects.
126-218 R3 & R4 UT & WY	Two electric transmission lines are within or adjacent to the corridor from MP 0 to MP 11. One electric transmission line is within or adjacent to the corridor from MP 109 to MP 119. Multiple natural gas pipelines are within or adjacent to the corridor from MP 0 to MP 67 and from MP 108 to MP 119.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional pipeline projects along most of the corridor except between MP 49 and MP 56 where it is constrained by topography. However, most of the corridor is designated underground only which would limit potential electric transmission projects.
129-218 R4 WY	A crude oil pipeline is within the corridor from MP 0 to MP 19. A natural gas pipeline is within the corridor from MP 11 to MP 19. One refined product pipeline extends the full length of the corridor and two others are within or adjacent to the corridor from MP 0 to MP 19.	A crude oil pipeline is planned within the corridor from MP 0 to MP 19.	Agencies anticipate the corridor could support additional projects, subject to possible limitations from the Union Pacific Railroad within the corridor from MP 0 to MP 9.
129-221 R4 WY	Multiple natural gas, crude oil, and refined product pipelines are within or adjacent to the corridor from MP 0 to MP 14.	An electric transmission line and a natural gas pipeline are planned within and adjacent to the full length of the corridor.	Agencies anticipate the corridor could support additional projects, subject to possible limitations from Interstate Hwy. 80 within the corridor from MP 0 to MP 14.

Corridor and Location	Existing Energy Infrastructure	Planned or Future Energy Development Potential	Potential Additional Energy Capacity
138-143 R3 & R4 CO & WY	A crude oil pipeline extends within and adjacent to the corridor from MP 24 to MP 48 and a natural gas pipeline extends within and adjacent to the corridor from MP 50 to MP 68.	No additional projects are currently planned.	Agencies anticipate the corridor could support additional projects.
218-240 R4 WY	A crude oil pipeline is within the corridor from MP 13 to MP 33. Multiple natural gas pipelines are within and adjacent to the corridor from MP 9 to MP 36. Multiple refined product pipelines are within and adjacent to the corridor from MP 0 to MP 36.	A refined product pipeline is planned within the corridor from MP 27 to MP 33.	Agencies anticipate the corridor could support additional projects.
219-220 R4 WY	Two electric transmission lines extend the full length of the corridor.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
220-221 R4 WY	Multiple electric transmission lines are within the corridor from MP 0 to MP 26. Other transmission lines extend within and adjacent to the corridor from MP 0 to MP 22 and from MP 26 to MP 35. Multiple natural gas pipelines extend within and adjacent to the corridor from MP 22 to MP 35.	An electric transmission line is planned within and adjacent to the corridor from MP 0 to MP 35.	Agencies anticipate the corridor could support additional projects.
229-254 R6 ID & MT	The corridor follows one or two existing electric transmission lines from MP 0 to MP 52 and is then centered on a single 500kV electric transmission line from MP 52 to MP 300. A natural gas pipeline is within and adjacent to the corridor from MP 5 to MP 29. A refined products pipeline is within and adjacent to the corridor from MP 5 to MP 21. The corridor is intersected by multiple electric transmission lines between MP 146 and 150, between MP 214 and MP 231, and between MP 265 and MP 272.	An electric transmission line is planned to use the corridor from MP 52 to MP 300.	Agencies anticipate the corridor could support additional projects.
229-254 (S) R6 ID & MT	An electric transmission line is within and adjacent to the corridor from MP 8 to MP 79	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.

Corridor and Location	Existing Energy Infrastructure	Planned or Future Energy Development Potential	Potential Additional Energy Capacity
230-248 R6 OR	There is no infrastructure currently within the corridor	A natural gas pipeline is planned within and adjacent to the full length of the corridor.	The potential for additional projects to use the corridor is limited by a pinch point between MP 1 and MP 2.
244-245 R6 WA	Multiple electric transmission lines are within and adjacent to the corridor.	No additional projects are currently proposed.	Agencies anticipate the corridor could support additional projects.
250-251 R6 OR	Two electric transmission lines are within and adjacent to the corridor from MP 0 to MP 30. A natural gas pipeline is within and adjacent to the full length of the corridor. A refined products pipeline is within and adjacent to the full length of the corridor.	An electric transmission line is planned within and adjacent to the corridor from MP 0 to MP 29. A natural gas pipeline is planned within and adjacent to the full length of the corridor.	Agencies anticipate the corridor could support additional projects.
261-262 R5 CA	Multiple electric transmission lines are within and adjacent to the entire length of the corridor.	No additional projects are currently proposed.	There is limited potential for additional projects because of the number of existing transmission lines coupled with the proximity of Interstate Hwy. 5 the entire length of the corridor.

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Appendix B: Energy Futures Synthesis for West-Wide Section 368 Energy Corridors



The [Energy Futures Synthesis Report](#) is available on the West-wide Energy Corridors website.

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Appendix C: Land Use Plans Associated with Regions 4, 5, and 6 Section 368 Energy Corridors

Table C-1: Land Use Plans Associated with Regions 4, 5, and 6 Section 368 Energy Corridors

Corridor	Region	State ^a	BLM/USFS Plans ^a
3-8	5	California	Lassen NF LMP ¹ Modoc NF LMP ² Shasta-Trinity NF LMP ³
4-247	6	Oregon	Northwestern and Coastal Oregon ROD/RMP ⁴ Southwestern Oregon ROD/RMP ⁵
5-201	6	Oregon	Northwestern and Coastal Oregon ROD/RMP
6-15	5	California	Sierra RMP/ROD ⁶ Tahoe NF LMP ⁷
		Nevada	Toiyabe NF LMP ⁸
7-8	5 and 6	California	Alturas RMP ⁹
		Oregon	Southwestern Oregon ROD/RMP
7-11	6	Oregon	Deschutes NF LMP ¹⁰ Fremont NF LMP ¹¹ Lakeview RMP/ROD ¹² Southwestern Oregon ROD/RMP Upper Deschutes RMP/ROD ¹³
7-24	6	Oregon	Andrews Management Unit ROD/RMP ¹⁴ Fremont NF LMP Lakeview RMP Southeastern Oregon RMP ¹⁵ Southwestern Oregon ROD/RMP Winema NF LMP ¹⁶
8-104	5	California	Alturas RMP Modoc NF LMP
10-246	6	Oregon	Mt. Hood NF LMP ¹⁷ Northwestern and Coastal Oregon RMP
11-103	6	Oregon	Upper Deschutes RMP
11-228	6	Idaho	Owyhee RMP ¹⁸
		Oregon	Brothers/LaPine RMP ¹⁹ Southeastern Oregon RMP Three Rivers RMP/ROD ²⁰ Upper Deschutes RMP

Corridor	Region	State ^a	BLM/USFS Plans ^a
15-17	5	Nevada	Carson City FO Consolidated RMP ²¹ Winnemucca District Planning Area RMP ²²
15-104	5	California Nevada	Alturas RMP Eagle Lake RMP ROD ²³ Carson City FO Consolidated RMP Toiyabe NF LMP
16-17	5	Nevada	Winnemucca District Planning Area RMP
16-24	5 and 6	Nevada Oregon	Winnemucca District Planning Area RMP Southeastern Oregon RMP
16-104	5	California Nevada	Alturas RMP ROD Surprise RMP ROD ²⁴ Winnemucca District Planning Area RMP
17-18	5	Nevada	Carson City Consolidated RMP Winnemucca District Planning Area RMP
17-35	5 (and 3)	Nevada	Winnemucca District Planning Area RMP
18-23	5 (and 1)	California Nevada	Bishop RMP ROD ²⁵ Inyo NF LMP ²⁶ Carson City FO Consolidated RMP Toiyabe NF LMP
18-224	5 (and 1)	Nevada	Carson City FO Consolidated RMP Las Vegas RMP ²⁷ Tonopah RMP ²⁸
24-228	6	Idaho Oregon	Owyhee RMP Southeastern Oregon RMP
29-36	6	Idaho	Jarbidge RMP ²⁹ Kuna MFP ³⁰
36-112	6	Idaho	Jarbidge RMP Monument RMP ³¹
36-226	6	Idaho	Jarbidge RMP Twin Falls MFP ³²
36-228	6	Idaho	Bruneau MFP ³³ Jarbidge RMP Kuna MFP Owyhee RMP
49-112	6	Idaho	Monument RMP
49-202	6	Idaho	Cassia RMP ³⁴ Monument RMP Pocatello RMP ³⁵
50-51	6	Montana	Dillon RMP ³⁶

Corridor	Region	State ^a	BLM/USFS Plans ^a
50-203	6	Idaho Montana	Medicine Lodge RMP ³⁷ Targhee NF Revised Forest Plan ³⁸ Dillon RMP ³⁹
51-204	6	Montana	Beaverhead-Deerlodge NF LMP ⁴⁰ Butte RMP
51-205	6	Montana	Beaverhead-Deerlodge National Forest LMP Butte RMP
55-240	4	Wyoming	Kemmerer RMP ⁴¹
73-129	4	Wyoming	Rawlins RMP ⁴²
73-133	4 (and 3)	Wyoming	Rawlins RMP
73-138	4	Wyoming	Rawlins RMP
78-85	4	Wyoming	Rawlins RMP
78-138	4	Wyoming	Rawlins RMP
78-255	4	Wyoming	Casper RMP ⁴³ Medicine Bow NF LMP ⁴⁴ Rawlins RMP
79-216	4	Montana Wyoming	Billings RMP ⁴⁵ Casper RMP Cody RMP ⁴⁶ Lander RMP ⁴⁷ Worland RMP ⁴⁸
101-263	5	California	Redding RMP ⁴⁹ Shasta Trinity NF LMP Six Rivers NF LMP ⁵⁰
102-105	6	Washington	Mt. Baker-Snoqualmie NF LMP ⁵¹ Wenatchee NF LMP ⁵² Spokane RMP ⁵³
111-226	6 (and 3)	Idaho	Twin Falls MFP
112-226	6	Idaho	Cassia RMP Monument RMP Twin Falls MFP
121-220	4	Wyoming	Green River RMP ⁵⁴
121-221	4	Wyoming	Green River RMP
121-240	4	Wyoming	Green River RMP Kemmerer RMP
126-218	4 (and 3)	Wyoming	Ashley NF LMP ⁵⁵ Green River RMP

Corridor	Region	State ^a	BLM/USFS Plans ^a
129-218	4	Wyoming	Green River RMP Rawlins RMP
129-221	4	Wyoming	Green River RMP Rawlins RMP
138-143	4 (and 3)	Wyoming	Rawlins RMP
218-240	4	Wyoming	Ashley NF LMP Green River RMP Kemmerer RMP
219-220	4	Wyoming	Green River RMP
220-221	4	Wyoming	Green River RMP
229-254(S)	6	Idaho Montana	Lolo National Forest Plan ⁵⁶ Lolo National Forest Plan
229-254	6	Idaho Montana	Coeur d'Alene RMP ⁵⁷ Idaho Panhandle National Forests LMP ⁵⁸ Lolo National Forest Plan Beaverhead-Deerlodge National Forest LMP Butte RMP Garnet RMP ⁵⁹ Lolo National Forest Plan
230-248	6	Oregon	Mt. Hood NF LMP Northwestern and Coastal Oregon ROD/RMP
244-245	6	Washington	Mt. Baker-Snoqualmie NF LMP Wenatchee NF LMP
250-251	6	Oregon	Baker RMP ⁶⁰ Southeastern Oregon RMP
261-262	5	California	Redding RMP Shasta Trinity NF LMP

Table C-2: Regions 4, 5, and 6 Section 368 Energy Corridors Affected by Land Use Plan Amendments Published after 2009

Corridor	RMPA/LMPA ^a	RMPA/LMPA Change to Corridor
GRSG ARMPAs		
7-8	<p>Nevada and Northeastern California GRSG ARMPA - Attachment 2 (BLM 2015)⁶¹</p> <p>Nevada and Northeastern California GRSG and ROD ARMPA (BLM 2019)⁶²</p> <p>Amend the Alturas RMP in California</p>	Corridor remains at no more than 500 ft in width within OHMA on BLM-administered land (MP 2 to MP 4). However, the corridor narrowing is unrelated to GRSG, as OHMAs are open for major ROWs.
7-11	<p>Oregon GRSG ARMPA - Attachment 3 (BLM 2015)⁶³</p> <p>Oregon GRSG ROD and ARMPA (BLM 2019)⁶⁴</p> <p>Amend the Lakeview and Upper Deschutes RMPs in Oregon</p>	Corridor remains at 3,500 ft. GHMAs are avoidance areas for major ROWs, but may be available with special stipulations. Additionally, designated existing utility corridors in GHMA will remain open to utility ROWs.
7-24	<p>Oregon GRSG ARMPA - Attachment 3 (BLM 2015)</p> <p>Oregon GRSG ROD and ARMPA (BLM 2019)</p> <p>Amend the Andrews Management Unit, Lakeview, and Southeastern Oregon RMPs in Oregon</p>	Corridor width remains at 3,500 ft. PHMAs and GHMAs are avoidance areas for major ROWs, but may be available with special stipulations. Additionally, designated existing utility corridors will remain open to utility ROWs. Although designated corridors will remain open to new ROWs, several reroutes are suggested for the corridor.
8-104	<p>Nevada and Northeastern California GRSG ARMPA - Attachment 2 (BLM 2015)</p> <p>Nevada and Northeastern California GRSG and ROD ARMPA (BLM 2019)</p> <p>Amend the Alturas RMP in California</p>	Corridor width remains at 3,500 ft within the Modoc NF and 500 ft within the Applegate FO (stated ROW width in the Alturas RMP is unrelated to GRSG). PHMAs and GHMAs are an avoidance area for major ROWs. However, existing designated corridors, including Section 368 Energy Corridors, will remain open to ROWs. Required Design Features identified in the ARMPAs would be required for future development within corridor intersections with PHMAs or GHMAs.
11-103	<p>Oregon GRSG ARMPA - Attachment 3 (BLM 2015)</p> <p>Oregon GRSG ROD and ARMPA (BLM 2019)</p> <p>Amend the Upper Deschutes RMP in Oregon</p>	Corridor width remains at 3,500 ft. GHMAs are avoidance areas for major ROWs, but may be available with special stipulations. Additionally, designated existing utility corridors will remain open to utility ROWs.
11-228	<p>Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015)⁶⁵</p> <p>Idaho GRSG ROD and ARMPA (BLM 2019)⁶⁶</p> <p>Amend the Owyhee RMP in Idaho.</p>	<p>Corridor width remains at 3,500 ft (except for MP 195 to MP 200 that remains at 1,500 ft due to the Owyhee Below Dam ACEC).</p> <p>In Idaho: Existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs.</p>

Corridor	RMPA/LMPA ^a	RMPA/LMPA Change to Corridor
	<p>Oregon GRSG ARMPA - Attachment 3 (BLM 2015)</p> <p>Oregon GRSG ROD and ARMPA (BLM 2019)</p> <p>Amend the Brothers/LaPine, Southeastern Oregon, Three Rivers, and Upper Deschutes RMPs in Oregon</p>	<p>In Oregon: PHMAs and GHMAs are avoidance areas for major ROWs, but may be available with special stipulations. Additionally, designated existing utility corridors will remain open to utility ROWs.</p>
15-17	<p>Nevada and Northeastern California GRSG ARMPA - Attachment 2 (BLM 2015)</p> <p>Nevada and Northeastern California GRSG and ROD ARMPA (BLM 2019)</p> <p>Amend the Carson City FO Consolidated RMP and Winnemucca District Planning Area RMP in Nevada</p>	<p>Corridor width remains at 10,560 ft. GHMAs are an avoidance area for major ROWs. However, existing designated corridors, including Section 368 Corridors, will remain open to ROWs. OHMAs are open for major ROWs.</p>
15-104	<p>Nevada and Northeastern California GRSG ARMPA - Attachment 2 (BLM 2015)</p> <p>Nevada and Northeastern California GRSG and ROD ARMPA (BLM 2019)</p> <p>Amend the Alturas and Eagle Lake RMPs in California and Carson City FO Consolidated RMP in Nevada</p> <p>GRSG ROD for Idaho and Southwest Montana, Nevada, and Utah and LMPAs (USFS 2015)⁶⁷</p> <p>Amends the Toiyabe NF LMP in Nevada</p>	<p>Corridor width remains at 3,500 ft (500 ft from MP 107 to MP 114). PHMAs and GHMAs are avoidance areas for major ROWs on BLM-administered lands. However, existing designated corridors, including Section 368 Corridors, will remain open to ROWs. Required Design Features identified in the ARMPAs would be required for future development within corridor intersections with PHMAs or GHMAs. The corridor portion within USFS-administered lands does not intersect PHMAs or GHMAs.</p>
16-17	<p>Nevada and Northeastern California GRSG ARMPA - Attachment 2 (BLM 2015)</p> <p>Nevada and Northeastern California GRSG and ROD ARMPA (BLM 2019)</p> <p>Amend the Winnemucca District Planning Area RMP in Nevada</p>	<p>Corridor width remains at 3,500 ft. OHMAs are open for major ROWs.</p>
16-24	<p>Nevada and Northeastern California GRSG ARMPA - Attachment 2 (BLM 2015)</p> <p>Nevada and Northeastern California GRSG and ROD ARMPA (BLM 2019)</p> <p>Amend the Winnemucca District Planning Area RMP in Nevada</p> <p>Oregon GRSG ARMPA - Attachment 3 (BLM 2015)</p> <p>Oregon GRSG ROD and ARMPA (BLM 2019)</p>	<p>Corridor width remains at 2,640 ft (MP 0 to MP 42) or 3,500 ft (MP 42 to MP 195).</p> <p>In Nevada: GHMAs are avoidance areas for major ROWs. However, existing designated corridors, including Section 368 Corridors, will remain open to ROWs. Required Design Features identified in the ARMPAs would be required for future development within corridor intersections with GHMAs.</p> <p>In Oregon: PHMAs and GHMAs are also avoidance areas for major ROWs. However, existing designated corridors, including Section 368 Corridors, will remain open to ROWs.</p>

Corridor	RMPA/LMPA ^a	RMPA/LMPA Change to Corridor
16-104	<p>Amend the Southeastern Oregon RMP in Oregon</p> <p>Nevada and Northeastern California GRSG ARMPA - Attachment 2 (BLM 2015)</p> <p>Nevada and Northeastern California GRSG and ROD ARMPA (BLM 2019)</p> <p>Amend the Alturas and Surprise RMPs in California and Winnemucca District Planning Area RMP in Nevada</p>	<p>Corridor width remains at 500 ft (MP 63 to MP 75), 1,000 ft (MP 14 to MP 19), or 3,500 ft (MP 0 to MP 14 and MP19 to MP 63). PHMAs and GHMAs are avoidance areas for major ROWs. However, existing designated corridors, including Section 368 Corridors, will remain open to ROWs. Required Design Features identified in the ARMPAs would be required for future development within corridor intersections with PHMAs or GHMAs.</p>
17-18	<p>Nevada and Northeastern California GRSG ARMPA - Attachment 2 (BLM 2015)</p> <p>Nevada and Northeastern California GRSG and ROD ARMPA (BLM 2019)</p> <p>Nevada and Northeastern California GRSG and ROD ARMPA (BLM 2019)</p> <p>Amend the Carson City FO Consolidated RMP and Winnemucca District Planning Area RMP in Nevada</p> <p>ROD and LUPA Nevada and California GRSG Bi-State DPS (BLM 2016)⁶⁸</p> <p>Amends the Carson City Field Office Consolidated RMP and the Approved Tonopah RMP</p>	<p>Corridor width remains at 10,560 ft. The corridor does not intersect PHMAs, GHMAs, or the Bi-State DPS habitat.</p>
17-35	<p>Nevada and Northeastern California GRSG ARMPA - Attachment 2 (BLM 2015)</p> <p>Nevada and Northeastern California GRSG and ROD ARMPA (BLM 2019)</p> <p>Amend the Winnemucca District Planning Area RMP in Nevada</p>	<p>Corridor width remains at 3,500 ft (1,000 ft at MP 143). PHMAs and GHMAs are avoidance areas for major ROWs. However, existing designated corridors, including Section 368 Corridors, will remain open to ROWs. Required Design Features identified in the ARMPAs would be required for future development within corridor intersections with PHMAs or GHMAs. OHMAs are open for major ROWs.</p>
18-23	<p>ROD and LUPA Nevada and California GRSG Bi-State DPS (BLM 2016)</p> <p>Amends the Carson City Field Office Consolidated RMP and the Approved Tonopah RMP</p> <p>GRSG Bi-state DPS Forest Plan Amendment (USFS 2016)⁶⁹</p> <p>Amends the Toiyabe NF LMP in Nevada</p>	<p>Variable corridor widths remain unmodified by GRSG LUPA or LMPAs. Both amendments state that new major transmission lines will only be authorized in DPS habitats when located within existing corridors.</p>
18-224	<p>Nevada and Northeastern California GRSG ARMPA - Attachment 2 (BLM 2015)</p> <p>Nevada and Northeastern California GRSG and ROD ARMPA (BLM 2019)</p>	<p>Corridor width remains at 10,560 ft (MP 0 to MP 90) and 3,500 ft (MP 90 to MP 257). The corridor does not intersect PHMAs or GHMAs.</p>

Corridor	RMPA/LMPA ^a	RMPA/LMPA Change to Corridor
	Amend the Carson City FO Consolidated RMP and Tonopah RMP in Nevada	
24-228	Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015) Idaho GRSG ROD and ARMPA (BLM 2019) Amend the Owyhee RMP in Idaho.	Corridor width remains at 3,500 ft. PHMAs, IHMAs, and GHMAs are ROW avoidance areas. However, existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs.
29-36	Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015) Idaho GRSG ROD and ARMPA (BLM 2019) Amend the Jarbidge RMP and Kuna MFP in Idaho	Corridor width remains at 3,500 ft (1,000 at MP 31 to MP 33). GHMAs are ROW avoidance areas. However, existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs.
36-112	Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015) Idaho GRSG ROD and ARMPA (BLM 2019) Amend the Jarbidge and Monument RMPs in Idaho.	Corridor width remains at 3,500 ft. GHMAs are ROW avoidance areas. However, existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs. No GRSG habitat in the portion of the corridor located within the Jarbidge Field Office.
36-226	Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015) Idaho GRSG ROD and ARMPA (BLM 2019) Amend the Jarbidge RMP and Twin Falls MFP in Idaho	Corridor width remains at 3,500 ft. PHMAs are ROW avoidance areas. However, existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs. No GRSG habitat in the portion of the corridor located within the Jarbidge Field Office.
36-228	Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015) Idaho GRSG ROD and ARMPA (BLM 2019) Amend the Bruneau and Kuna MFPs and the Jarbidge and Owyhee RMPs in Idaho.	Corridor width remains at 3,500 ft for most of its length and at 1,000 ft where it crosses the Morley Nelson Snake River Birds of Prey NCA. IHMAs and GHMAs are ROW avoidance areas. However, existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs.
49-112	Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015) Idaho GRSG ROD and ARMPA (BLM 2019) Amend the Monument RMP in Idaho.	Corridor width remains at 3,500 ft. GHMAs are ROW avoidance areas. However, existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs.
49-202	Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015) Idaho GRSG ROD and ARMPA (BLM 2019) Amend the Cassia, Monument, and Pocatello RMPs in Idaho	Corridor width remains at 3,500 ft. IHMAs and GHMAs are ROW avoidance areas. However, existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs.
50-51	Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015) Amends the Dillon RMP in Montana	Corridor width remains at 3,500 ft. GHMAs are ROW avoidance areas. However, existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs.
50-203	Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015) Idaho GRSG ROD and ARMPA (BLM 2019)	Corridor width remains at 3,500 ft. BLM-administered lands: PHMAs, IHMAs, and GHMAs are ROW avoidance areas. However,

Corridor	RMPA/LMPA ^a	RMPA/LMPA Change to Corridor
	<p>Amend the Medicine Lodge RMP in Idaho and the Dillon RMP in Montana</p> <p>GRSG ROD for Idaho and Southwest Montana, Nevada, and Utah and LMP Amendments (USFS 2015)</p> <p>Amends the Targhee NF Revised Forest Plan in Idaho</p>	<p>existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs. However, there are multiple leks within 2 mi of the corridor. The corridor may have to be shifted to avoid these areas (buffer is 2 mi for PHMAs, 1.2 mi for IHMAs, and 0.6 mi for GHMAs).</p> <p>USFS-administered lands: Infrastructure authorization may be issued on IHMAs if they can be located within existing designated corridors or ROWs. The authorization include stipulations to protect GRSG and its habitat.</p>
51-205	<p>Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015)</p> <p>Amends the Butte RMP</p> <p>GRSG ROD for Idaho and Southwest Montana, Nevada, and Utah and LMP Amendments (USFS 2015)</p> <p>Amends the Beaverhead-Deerlodge NF LMP in Montana</p>	<p>Corridor width remains at 3,500 ft. GHMAs are ROW avoidance areas. However, existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs. No GRSG habitat occurs in the corridor within the Beaverhead-Deerlodge NF.</p>
55-240	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)⁷⁰</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)⁷¹</p> <p>Amend the Kemmerer RMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
73-129	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Rawlins RMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
73-133	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Rawlins RMP in Wyoming</p>	<p>The corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
73-138	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Rawlins RMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. PHMAs will be managed as ROW avoidance areas for new ROWs. Where new ROWs are necessary, they will be located within designated RMP corridors or adjacent to existing ROWs where technically feasible</p>

Corridor	RMPA/LMPA ^a	RMPA/LMPA Change to Corridor
		<p>Subject to valid existing rights, required new ROWs will be located adjacent to existing ROWs or where they best minimize GRSG impacts.^b Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
78-85	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Rawlins RMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
78-138	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Rawlins RMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. PHMAs will be managed as ROW avoidance areas for new ROWs. Where new ROWs are necessary, they will be located within designated RMP corridors or adjacent to existing ROWs where technically feasible. Subject to valid existing rights, required new ROWs will be located adjacent to existing ROWs or where they best minimize GRSG impacts.^b Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
78-255	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Casper and Rawlins RMPs in Wyoming</p> <p>GRSG ROD for Northwest Colorado and Wyoming (USFS 2015)⁷²</p> <p>Amends the Medicine Bow NF LMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft.</p> <p>BLM-administered lands: The corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. PHMAs will be managed as ROW avoidance areas for new ROWs. Where new ROWs are necessary, they will be located within designated RMP corridors or adjacent to existing ROWs where technically feasible. Subject to valid existing rights, required new ROWs will be located adjacent to existing ROWs or where they best minimize GRSG impacts.^b Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p> <p>USFS-administered lands: Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors.</p>

Corridor	RMPA/LMPA ^a	RMPA/LMPA Change to Corridor
79-216	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Billings Field Office GRSG ARMPA – Attachment 5 (BLM 2015)</p> <p>Cody Field Office ARMPA – Attachment 7 (BLM 2015)</p> <p>Worland Field Office ARMPA – Attachment 12 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Casper RMP, Cody RMP, Lander RMP, and Worland RMP in Wyoming and the Billings RMP in Montana</p>	<p>Corridor width remains at 3,500 ft.</p> <p>In Wyoming: Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. PHMAs will be managed as ROW avoidance areas for new ROWs. Where new ROWs are necessary, they will be located within designated RMP corridors or adjacent to existing ROWs where technically feasible Subject to valid existing rights, required new ROWs will be located adjacent to existing ROWs or where they best minimize GRSG impacts.^b Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p> <p>In Montana: PHMAs and GHMAs are ROW avoidance area. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors.</p>
111-226	<p>Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015)</p> <p>Idaho GRSG ROD and ARMPA (BLM 2019)</p> <p>Amend the Twin Falls MFP in Idaho</p>	<p>Corridor width remains at 3,500 ft. PHMAs and IHMAs are ROW avoidance areas. However, existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs.</p>
112-226	<p>Idaho and Southwestern Montana GRSG ARMPA - Attachment 1 (BLM 2015)</p> <p>Idaho GRSG ROD and ARMPA (BLM 2019)</p> <p>Amend the Cassia and Monument RMPs and the Twin Falls MFP in Idaho</p>	<p>Corridor width remains at 3,500 ft. PHMAs, IHMAs, and GHMAs are ROW avoidance areas. However, existing designated corridors, including Section 368 Corridors, will remain open to utility ROWs.</p>
121-220	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Green River RMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. PHMAs will be managed as ROW avoidance areas for new ROWs. Where new ROWs are necessary, they will be located within designated RMP corridors or adjacent to existing ROWs where technically feasible Subject to valid existing rights, required new ROWs will be located adjacent to existing ROWs or where they best minimize GRSG impacts.^b Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>

Corridor	RMPA/LMPA ^a	RMPA/LMPA Change to Corridor
121-221	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Green River RMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. PHMAs will be managed as ROW avoidance areas for new ROWs. Where new ROWs are necessary, they will be located within designated RMP corridors or adjacent to existing ROWs where technically feasible. Subject to valid existing rights, required new ROWs will be located adjacent to existing ROWs or where they best minimize GRSG impacts.^b Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
121-240	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Green River and Kemmerer RMPs in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. PHMAs will be managed as ROW avoidance areas for new ROWs. Where new ROWs are necessary, they will be located within designated RMP corridors or adjacent to existing ROWs where technically feasible. Subject to valid existing rights, required new ROWs will be located adjacent to existing ROWs or where they best minimize GRSG impacts.^b Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
126-218	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Green River RMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. PHMAs will be managed as ROW avoidance areas for new ROWs. Where new ROWs are necessary, they will be located within designated RMP corridors or adjacent to existing ROWs where technically feasible. Subject to valid existing rights, required new ROWs will be located adjacent to existing ROWs or where they best minimize GRSG impacts.^b Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
129-218	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Green River and Rawlins RMPs in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>

Corridor	RMPA/LMPA ^a	RMPA/LMPA Change to Corridor
129-221	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Green River and Rawlins RMPs</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
138-143	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Rawlins RMP</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. PHMAs will be managed as ROW avoidance areas for new ROWs. Where new ROWs are necessary, they will be located within designated RMP corridors or adjacent to existing ROWs where technically feasible Subject to valid existing rights, required new ROWs will be located adjacent to existing ROWs or where they best minimize GRSG impacts.^b Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
218-240	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Green River and Kemmerer RMPs in Wyoming</p> <p>GRSG ROD for Idaho and Southwest Montana, Nevada, and Utah and LMP Amendments (USFS 2015)</p> <p>Amends the Ashley NF LMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft on BLM-administered lands and 1,500 ft on USFS-administered lands.</p> <p>BLM-administered lands: The corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. PHMAs will be managed as ROW avoidance areas for new ROWs. Where new ROWs are necessary, they will be located within designated RMP corridors or adjacent to existing ROWs where technically feasible Subject to valid existing rights, required new ROWs will be located adjacent to existing ROWs or where they best minimize GRSG impacts.^b Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p> <p>USFS Administered lands: Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors.</p>
219-220	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Green River RMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>

Corridor	RMPA/LMPA ^a	RMPA/LMPA Change to Corridor
220-221	<p>Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Spring Field Office ARMPA GRSG - Attachment 4 (BLM 2015)</p> <p>Wyoming GRSG ARMPA and ROD (BLM 2019)</p> <p>Amend the Green River RMP in Wyoming</p>	<p>Corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
250-251	<p>Oregon GRSG ARMPA - Attachment 3 (BLM 2015)</p> <p>Oregon GRSG ROD and ARMPA (BLM 2019)</p> <p>Amend the Baker and Southeastern Oregon RMPs in Oregon</p>	<p>Corridor width remains at 3,500 ft. The corridor width remains at 3,500 ft. Existing designated corridors, including Section 368 Corridors, will remain open to utility corridors. PHMAs will be managed as ROW avoidance areas for new ROWs. Where new ROWs are necessary, they will be located within designated RMP corridors or adjacent to existing ROWs where technically feasible Subject to valid existing rights, required new ROWs will be located adjacent to existing ROWs or where they best minimize GRSG impacts.^b Within GHMAs, where new ROWs are necessary, they will be collocated with existing ROWs where technically feasible. Additionally, appropriate GRSG timing constraints will be applied.</p>
Recently Authorized Interstate Transmission Projects		
29-36	<p>Gateway West Transmission Project ROD⁷³</p> <p>Amends the Morley Nelson Snake River Birds of Prey NCA RMP.</p>	<p>The Gateway West transmission line and ancillary facilities will be allowed within 0.5 mi of occupied, sensitive plant habitat, with appropriate mitigation to protect sensitive plants, including Slickspot Peppergrass. Also amends the Utility and Communications Corridors Management action to allow development of the Project as follows: Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow additional major powerline ROWs as applicable with laws and values for which the NCA was designated. Allow two additional 500-kV transmission line ROWs to leave the designated WWEC and exit the NCA due south of Bruneau Dunes State Park.</p>
36-228	<p>Gateway West Transmission Project ROD</p> <p>Amends the Morley Nelson Snake River Birds of Prey NCA RMP.</p>	<p>The Gateway West transmission line and ancillary facilities will be allowed within 0.5 mi of occupied, sensitive plant habitat, with appropriate mitigation to protect sensitive plants, including Slickspot Peppergrass. Also amends the Utility and Communications Corridors Management action to allow development of the Project as follows: Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow additional major powerline ROWs as applicable with laws and values for which the NCA was designated. Allow two additional 500-kV transmission line ROWs to leave the designated WWEC and exit the NCA due south of Bruneau Dunes State Park.</p>

Corridor	RMPA/LMPA^a	RMPA/LMPA Change to Corridor
73-138	<p>TransWest Express Transmission Project ROD⁷⁴</p> <p>Amends the Rawlins RMP</p>	The Rawlins-Wamsutter WVEC Corridor (including MP 4 to MP 16 of Corridor 73-138) is expanded from 3,500 to 7,000 ft in width.
78-138	<p>Energy Gateway South Transmission Project ROD⁷⁵</p> <p>Amends Rawlins RMP</p> <p>TransWest Express Transmission Project ROD</p> <p>Amends the Rawlins RMP</p>	<p>Amendments to the Rawlins RMP do not involve the area near Corridor 78-138.</p> <p>The Rawlins-Wamsutter WVEC Corridor (including MP 51 to MP 80 of Corridor 78-138) is expanded from 3,500 to 7,000 ft in width.</p>
112-226	<p>Gateway West Transmission Project ROD</p> <p>Amends the Twin Falls MFP</p>	An amendment to the Twin Falls MFP allows future power transmission lines (lines of at least 46 to 138 kV which originate and terminate outside of the MFP area) to be constructed within the recommended corridors. It also allows construction of transmission lines between the corridors. It does not permit power lines to the west or the east of the two corridors. It allows a 500-kV transmission line ROW outside existing corridors.
250-251	<p>Boardman to Hemingway Transmission Line Project ROD⁷⁶</p> <p>Amends the Baker and Southeastern Oregon RMPs</p>	Amendments to the Baker RMP do not involve the area near Corridor 250-251. Amendments to the Southeastern Oregon RMP include a change in a VRM Class III area near MP 36 to MP 37 to a VRM Class IV area.

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Appendix D: Stakeholder Engagement

D.1 Stakeholders that Provided Input on Regions 4, 5, and 6 Corridor Abstracts

Federal Agencies

- Deschutes National Forest Bend-Fort Rock Ranger District

State Agencies

- California Energy Commission
- Montana Department of Environmental Quality
- Montana Fish, Wildlife, and Parks
- State of Wyoming, Office of the Governor
- Washington Department of Fish and Wildlife
- Wyoming Game and Fish Department

Tribes

- Big Pine Paiute Tribe of the Owens Valley

Local Government

- Baker County, Oregon
- Campbell County, Wyoming
- Inyo County Board of Supervisors
- Mono County, California
- Owyhee County, Idaho
- Sweetwater County, Wyoming

Nongovernmental Organizations

- Alabama Hills Stewardship Group
- BARK
- Center for Biological Diversity The Wilderness Society
- Columbia Riverkeeper
- Defenders of Wildlife
- Friends of the Inyo
- Greater Little Mountain Coalition
- Great Old Broads for Wilderness Cascade Volcanoes Chapter
- Oregon Natural Desert Association
- Oregon Wild
- Pacific Crest Trail Association
- Toiyabe Chapter of the Sierra Club and the Bodie Hills Conservation Partnership
- Trout Unlimited
- Western Watersheds Project

Industry

- Idaho Power Company
- Pacific Gas and Electric Company
- Southern California Edison
- Williams Companies
- Wyoming Pipeline Authority

D.2 Stakeholders Participating in Regions 4, 5, and 6 Review Workshops**Missoula, Montana**

- Cassia County
- Defenders of Wildlife
- Jefferson County Commission
- Montana Department of Environmental Quality
- Montana Department of Transportation
- Montana Fish, Wildlife, and Parks
- National Park Service
- National Park Service-National Trails Intermountain Region
- Owyhee County
- Representative for U.S. Congressman Gionforte
- TC Energy
- Tongue River Electric Cooperative
- The Wilderness Society
- Bureau of Land Management
- U.S. Forest Service

Rock Springs, Wyoming

- Andeavor Gathering LLC
- Campbell County Board of Commissioners
- Defenders of Wildlife
- Exxon Mobil
- Greater Little Mountain Coalition
- Lincoln County Commission
- Medicine Bow Conservation District
- Petroleum Association of Wyoming
- Representative for Congresswoman Cheney
- SER Conservation District
- SWCO
- Wilderness Society
- Wyoming Department of Transportation
- Wyoming Department State Parks
- Bureau of Land Management
- U.S. Forest Service

Reno, Nevada

- Big Pine Paiute Tribe
- Citizens for the Preservation of Long Valley
- Ducks Unlimited
- EMPSI
- Friends of the Inyo
- Inyo County
- LS Power
- Mono County
- Nevada Department of Wildlife
- Nevada Governor's Office of Energy
- NV Energy
- Nye County
- ONEOK, Inc.
- Pacific Crest Trail Association
- Pacific Gas & Electric
- Pyramid Lake Paiute Tribe
- Sierra Club
- Southwest Gas Corporation
- The Nature Conservancy
- Valley Electric Association
- Walker Basin Conservancy
- Wells Rural Electric
- Wilderness Society
- Bureau of Land Management
- U.S. Forest Service

Redmond, Oregon

- BARK
- Bitterbrush Broads-Great Old Broads for Wilderness
- Booz Allen Hamilton
- Oregon Natural Desert Association
- The Wilderness Society
- Tree Trouble
- Bureau of Land Management
- U.S. Forest Service

D.3 Background on Stakeholder Engagement, Summary of Stakeholder Input, and Agency Response

Stakeholder engagement began with the agency release of corridor abstracts for Regions 4, 5, and 6 on February 20, 2019. Public input was requested to be submitted by April 8, 2019. Agencies made efforts to engage with State Governors' Offices, county governments, and tribal governments located in (or with interest in) the regional review area. Agencies asked stakeholder input to focus on the corridor pathway needs, specific environmental concerns within existing Section 368 energy corridors and

suggestions to increase compatibility with energy transmission needs and with valuable resource protection through corridor revisions, deletions, and additions.

To facilitate further stakeholder involvement, a web-based input form was provided on the project website at <http://www.corridoreis.anl.gov/>. During the review period input was received from 34 entities (including Federal, Tribal and State entities, local governments, industry, and NGOs). Additional stakeholder input was received by mail and some was submitted directly to agency staff via email and telephone.

Agencies held stakeholder workshops from May 29 to June 6, 2019 in Missoula, Montana; Rock Springs, Wyoming; Reno, Nevada; and Redmond, Oregon. More than 112 people attended the workshops. The purposes of the workshops were to promote further public engagement, provide transparency regarding the review process, and to gain additional stakeholder input on potential revisions, deletions, and additions through interactive work break-out sessions. The workshops provided a venue for robust discussion among stakeholders and agency personnel about the regional reviews process as well as specific Section 368 energy corridors. Section D.2 above includes a list of entities that provided input during the stakeholder input periods.

Complete stakeholder input will be presented in two separate reports that will be available on the website: *Regions 4, 5, and 6: Stakeholder Input, Section 368 Energy Corridor Review* and [2014 Request for Information: Section 368 Energy Corridors – Written Stakeholder Input](#). Corridor-specific stakeholder input has been incorporated into the corridor abstracts, which were revised based on stakeholder input and made available on the website in May 2019. Non-corridor-specific stakeholder input on specific topics is summarized below. The Agencies have provided an initial response, but stakeholder input will be considered beyond the regional review. Through the Regions 4, 5, and 6 regional review, the Agencies intend to carry stakeholder concerns and suggestions forward for review of future projects as well as the future siting of Section 368 energy corridors.

D.3.1 Tribal Concerns

Tribal input as well as input from other stakeholders recommended that adjustments be made to protect cultural resources and cultural resource areas. These stakeholders also recommended agency consideration of environmental impacts that may have direct or indirect effects on tribal culture, traditions, and economics.

Agency Response: Existing IOPs related to cultural resources would be required for development within a Section 368 energy corridor. In addition, the Agencies have developed draft language for an additional IOP related to ethnographic studies which would serve to aide in minimizing potential impacts on Tribal concerns and cultural resources.

D.3.2 Environmental Concerns

The general environmental concerns are identified below. Corridor-specific concerns are identified and assessed in the corridor abstracts and corridor summaries. Projects proposed within Section 368 energy corridors would require appropriate site-specific environmental review pursuant to

the requirements of NEPA and other applicable law and would include an evaluation of the resources listed below.

Ecological Resources - Special Status Animal Species

Several organizations submitted concerns about potential impacts on listed species, particularly GRSG and other species affected by habitat fragmentation. Stakeholders recommended avoiding designated habitats for GRSG and ESA-listed species and minimizing impacts by implementing best management practices and mitigation measures where avoidance is not possible. Stakeholder input included that BLM must consider provisions of the 2015 Greater Sage-grouse Approved Resource Management Plan Amendments, especially those related to climate issues. Another comment stated that the Agencies should immediately begin formal ESA Section 7 consultation.

Agency Response: The preferred methodology to mitigate undue degradation of resources is to collocate (to the extent feasible) future energy infrastructure with existing infrastructure. In many cases, re-routing the corridor to avoid special status species habitat is not a likely solution because of prevalence of habitat and the value in collocating infrastructure to limit disturbance and fragmentation. The Agencies contemplated recommendations for specific corridor revisions related to GRSG habitat during this regional review. The Agencies prefer to avoid impacts wherever possible; where avoidance isn't possible, minimization or mitigation of impacts should be implemented. For example mitigation includes the Agencies require scheduling construction times to avoid the breeding season. The Agencies have avoidance and minimization requirements in place and collaborate with U.S. Fish and Wildlife Service when appropriate to protect threatened and endangered species with habitat in or near project areas. In the case of GRSG, requirements for transmission lines and avoidance are outlined in the 2019 revisions to the ARMPAs. As corridor revisions, additions, deletion, or project specific proposals are reviewed and processed by the agencies, Section 7 consultation will occur as appropriate.

Ecological Resources – Other

Stakeholders suggested that the Agencies should place the highest priority on addressing impacts from corridors that are not co-located with existing transmission lines and pipelines. There was concern that disturbance of soil and native vegetation during project construction and maintenance activities within corridors would potentially increase the spread of weeds and disease, divert water, increase erosion, and fragment habitat. There was also a concern about wildfire risk. Stakeholders also commented that permanent vegetation removal from overly wide energy corridors could violate the Clean Water Act and the Endangered Species Act. Concerns were presented about impacts on wildlife caused by collisions with power lines and other corridors structures, habitat loss and fragmentation, and interference with natural migration patterns. Plans for infrastructure work in existing or new corridors should include avoidance, minimization, and mitigation measures to ensure that future development does not adversely impact wildlife and wildlife linkage areas. Regional Reviews should address intersections with all native and wild trout and salmon habitat. One organization suggested imposing seasonal restrictions on construction and maintenance activities (for example, avoiding vegetation removal during bird nesting season). Another recommended incorporating Important Bird Areas (IBAs) as a sensitive resource category under "Medium Potential Conflict Areas" in the Conflict Assessment Criteria table.

Agency Response: The concerns identified may best be addressed through an additional IOP regarding habitat connectivity which could establish consistent controls for best management practices when infrastructure development occurs within corridors. This would add protection considerations for

ecological resources as part of the project-level NEPA. Restrictions are already in place for many threatened and endangered species. In the case of GRSG, transmission lines and avoidance are outlined in the 2019 NWCO ARMPA.

Lands with Wilderness Characteristics

Several organizations stated that corridors should avoid lands with wilderness characteristics and wilderness-quality lands wherever possible and that the Agencies should add IOPs that would require mitigation to minimize and offset unavoidable impacts. Stakeholders noted that many intersections with wilderness-quality lands were not reflected in the corridor abstracts, and that all wilderness-quality lands should be excluded from the Section 368 energy corridors. The corridor abstracts should indicate where inventory work is ongoing. They should also note areas that have wilderness characteristics but have not undergone land use planning. The same organization recommended using the following designations when characterizing lands with wilderness characteristics, rather than the current general language, *lands with undetermined status for wilderness characteristic intersect and are adjacent to the corridor*: 1) inventoried lands with wilderness characteristics, managed for protection; 2) *inventoried* lands with wilderness characteristics, *not managed for protection*; and 3) *inventoried* lands with wilderness characteristics, *management direction pending*. Another organization stated that lands with wilderness characteristics data, including the inventory completed by the Lakeview BLM District, Oregon in late 2018 should be updated and corridors passing through lands with wilderness characteristics units should be revised to avoid lands with wilderness characteristics.

Agency Response: The Agencies have considered stakeholder comments for specific corridor revisions and for some corridors have identified where boundaries could be adjusted to avoid lands with wilderness characteristics. However, in some instances, siting of energy corridors along existing infrastructure remains preferable and would likely minimize impacts at the macro-scale despite intersections with certain local lands with wilderness-qualities. This approach is anchored on the settlement agreement four siting principles and best balances the need for resource protection and land use. The Agencies have also drafted a potential new IOP related to consistent best management practices when processing applications for infrastructure development within areas where lands have wilderness characteristics.

Specially Designated Areas

Several organizations stated that corridors should avoid various specially designated areas, including ACECs, Roadless Areas, wilderness study areas, and other resources and values. One organization stated that the Agencies must use a better and more consistent approach for addressing resource conflicts that occur at corridor intersections with these areas. A stakeholder recommended adjusting or deleting corridors to eliminate intersections with ACECs and roadless areas.

Agency Response: The corridor abstracts identify where Section 368 energy corridors intersect ACECs and other specially designated areas. The corridor summaries identify where avoidance or exclusion areas intersect the corridors and that conflicting management objectives should be resolved through a corridor revision, revision to specially designated area boundaries (if applicable) or a revision of the management prescriptions. The agencies recognize a need to address incompatible land use management objectives that exist in their land use plans and provide more clarity and/or prioritization of land management objectives. In general, the Agencies are open to potential revisions if shifting the corridors to avoid a specially designated area makes the most sense. In certain instances, maintaining

the alignment of corridors with existing infrastructure may be preferable to minimize impacts from infrastructure sprawl across more area and resources.

Visual Resources

A stakeholder stated that projects could experience schedule delays when trying to use corridors without a complete Visual Resource Inventory and also stated that corridor locations that occur on BLM or USFS lands should not have VRM I or II designations within them. Another organization suggested using vegetation as a visual screen in order to maintain the integrity of viewsheds.

Agency Response: Viewshed analyses would be conducted as part of the required project-specific environmental review at the time that a project proponent is seeking authorization to use a Section 368 energy corridor for a specific project. In general, Section 368 energy corridors follow existing infrastructure where possible to minimize impacts on visual resources. In addition, the Agencies are developing IOPs that will help address corridor intersects with visual resource objectives.

Water Resources

Concerns were introduced regarding impacts on water quality and watersheds. Stakeholders commented that watershed information and analysis were lacking from the corridor abstract reviews even though corridors cross streams, rivers, wetlands, and riparian resources. Concerns focused on impacts on: sensitive stream habitats caused by drilling mud, erosion into streams caused by damage to steep slopes by off-highway vehicles, areas with highly erosive soils, and regions where substantial precipitation occurs.

Agency Response: Water quality and watershed concerns brought forward by stakeholders were considered during this macro-scale review to the extent feasible, but would need to be addressed at a more local-scale and/or during project-specific review and analysis. Best management practices are outlined in existing IOPs related to surface water and groundwater resources that would be required for development within a Section 368 energy corridor.

Cumulative Impacts

Stakeholders stated that a cumulative impacts analysis should be performed to consider: 1) the cumulative impacts of multiple corridors on natural resources within the same region, (e.g., habitat management areas for GRS); 2) the cumulative impacts of power production alternatives and their energy corridor consequences; and 3) the cumulative impacts of continuous corridors, including both federal and non-federal land.

Agency Response: Cumulative impacts were analyzed in the 2009 West-wide Energy Corridor PEIS and would be further analyzed during project-specific environmental review. However, the regional reviews did evaluate the corridors a macro-scale that considered sensitive resources as well as energy demand and use to find the right balance (founded in the siting principles) across the entire western United States.

Climate Change

A stakeholder argued that resources should not be wasted on new fossil fuel infrastructure; climate change needs to be addressed.

Agency Response: The Section 368 of the Energy Policy Act of 2005 (EPAct) mandates that the U.S. Department of the Interior (DOI) and the U.S. Department of Agriculture (USDA) designate energy

corridors for potential placement of future oil, gas, and hydrogen pipelines and electricity transmission and distribution infrastructure. In addition, one of the siting principles identified in the Settlement Agreement is to ensure that corridors provide connectivity to renewable energy generation to the maximum extent possible while also considering other sources of generation, in order to balance the renewable sources and to ensure the safety and reliability of electricity transmission.

D.3.2 Corridor Issues and Use Opportunities

Potential Corridor Additions

There was discussion during the Missoula workshop that a north-south corridor in western Idaho sited mostly on public lands would potentially be valuable and would minimize impacts on agricultural practices in comparison with corridors located mainly on private crop lands; however, a specific new corridor location has not currently been identified. Stakeholders expressed that additional corridor options in Campbell County, Wyoming had not been thoroughly vetted.

Agency Response: Potential corridor additions (including a potential corridor addition in southern Idaho) were considered in this regional review and are listed in Table 3-1 and described further in the corridor summaries document.

Corridor Location Considerations

A stakeholder stated that the review process should focus on connecting large populations and load centers, not facilitating suburban expansion in rural areas. The review process must also consider alternatives that would encourage energy generation and energy consumption near the place of production. Other recommendations regarding corridor siting included: collocating new energy facilities within or adjacent to existing ROWs; concentrating future ROW access and development in the most degraded landscapes; avoiding areas with important wildlife values; avoiding fragmentation of high-quality habitat; choosing an alternative that disturbs the smallest land area; and siting to facilitate renewable energy development. There was a recommendation that corridors should not include lands with a federal land use designation of “no surface occupancy.” A member of the public suggested adjusting corridors to provide access to areas with high potential for renewable energy development, and that potential price and market changes related to this co-location should be analyzed. The State of Wyoming wanted to ensure that the Section 368 energy corridor regional review efforts were coordinated with the Wyoming Pipeline Corridor Initiative.

Agency Response: Section 368 of the EAct mandates that the DOI and the USDA designate energy corridors for potential placement of future oil, gas, and hydrogen pipelines and electricity transmission and distribution infrastructure across the 11 western states. Collocation is always preferred to minimize impacts and one of the siting principles identified in the Settlement Agreement is to ensure that corridors provide connectivity to renewable energy generation to the maximum extent possible while considering other forms of energy generation. The Agencies have considered the Wyoming Pipeline Corridor Initiative in this regional review. Many of the corridors link large populations and load centers or connect areas of energy generation to consumers. The Agencies agree that maximum flexibility is necessary to maximize utility of energy corridors while minimizing potential resource impacts. Agencies have considered this in the revisions, deletions, and additions to the corridors and have identified actions to be further analyzed at a more local-level during subsequent land use planning efforts.

Transmission/Pipeline Capacity and Electric Grid

One stakeholder pointed out potential compatibility issues within the corridors and stated that natural gas facilities should be as far from high voltage alternative current (HVAC) lines as practical. HVAC in the immediate vicinity of natural gas pipelines increases the risk of faults or induced corrosion and can affect the cathodic protection systems used to control the corrosion. Stray DC current can also cause interference corrosion, which would require mitigation measures. A power company stated that specific siting requirements (such as maintaining a certain distance between infrastructure) should be clearly established and documented. A stakeholder stated that a 3,500 ft width would constrain corridors with multiple high-voltage transmission lines that serve similar operational functions. Corridors should be wide enough to allow for a separation of lines that would optimize energy transport efficiency and business investment. A stakeholder suggested that long distance corridors may not be needed if improvement to connectivity to enhance the capability of the national grid to deliver electricity were made. Adverse impacts associated with centralized facilities and multi-nodal energy corridors (including terrorist threats) need to be addressed.

Agency Response: The Federal Energy Regulatory Commission regulates the interstate transmission of electricity, natural gas, and oil as well as protects the reliability of the high voltage interstate transmission system through mandatory reliability standards.

D.3.3 Stakeholder Engagement and the Regional Reviews Process

Stakeholder Involvement

Three organizations noted the importance of maintaining a strong public engagement process, noting that it was crucial for meeting the terms of the Settlement Agreement. The following suggestions for stakeholder engagement were made: 1) make public comments provided during the regional review process electronically available; and 2) make additional public outreach opportunities available to promote local coordination and collaboration with federal and state agencies.

Agency Response: The regional review process calls for robust stakeholder involvement. Stakeholder engagement has been sought by the Agencies at multiple times during the regional review process through webinars, public meetings, outreach to state and local government, national press releases, coordination with regional, state, and local agency staff and through a comment period following the release of Section 368 energy corridor abstracts. The Agencies also solicited stakeholder input on the potential revisions, deletions, and additions for the Section 368 energy corridors during the regional reviews. In addition, the project website is an online source for public information on the Section 368 energy corridors and regional reviews. The public comments provided during the regional review will be available on the WWEC Information Center website. Additional public outreach and engagement would occur at the land use planning level when the Agencies consider any changes to the Section 368 energy corridors.

Consultation and Coordination

There were concerns about the Agencies' approach to tribal consultation regarding the corridors and that a contact person should have been designated to inform and consult with tribes.

Agency Response: Tribal outreach was an important component of the regional review. The agencies made contact and had communication with tribes regarding cultural and natural resource concerns.

Tribal consultation is also a requirement that the agencies take seriously at the time a project is proposed across lands it administers. The agencies follow their policies as well as an existing IOP which emphasizes consultation engagement. In addition, the Agencies are considering an additional IOP emphasizing the importance of working with tribes to conduct ethnographic studies to increase the Agencies' understanding of significant resources of concern to tribes.

Interagency Operating Procedures (IOPs)

One organization proposed adding IOPs that would require mitigation measures to minimize and offset unavoidable impacts where resource conflicts, such as corridor intersections with wilderness-quality lands, occur. The same organization also encouraged the Agencies to develop IOPs for any development that might occur in GRSG habitat. Another organization suggested IOPs for addressing nationally designated trails, with particular emphasis on preserving viewsheds.

Agency Response: Based on stakeholder concerns and additional review, the Agencies are considering the addition of IOPs for lands with wilderness characteristics, GRSG habitat, and national historic and scenic trails.

Settlement Agreement

One environmental organization stated that in order to meet the terms of the Settlement Agreement, the Agencies must further improve their methods for addressing environmental concerns for the corridors. Future changes to corridors need to comply with the Settlement Agreement, FLPMA (Federal Land Policy and Management Act), NEPA (National Environmental Policy Act), and Section 368 of the Energy Policy Act of 2005 (EPAAct).

Agency Response: Any changes to Section 368 energy corridors would be done during the land use planning process in compliance with FLPMA and NEPA.

New Data/Additional Analyses and GIS Mapping Tool

Recommendations were made for incorporating additional or updated data/datasets into the Regional Review process, including: rare and at-risk plants and animals data from the Nevada Natural Heritage Program; updated Lands with Wilderness Characteristics inventory data; data from the California Statewide Energy Gateway site (<https://caenergy.databasin.org/>); and wildlife corridors identified through processes set out in Secretarial Order 3362 (Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors). Several organizations appreciated the utility of the GIS Mapping Tool and offered the following suggestions for its continued improvement: provide complete metadata for each ACEC; include data for the following resources: watershed drainages; all existing and future updates of inventories of BLM and Forest Service wilderness-quality lands; all resources and designations considered in the Conflicts Assessment Table; updates to Resource Management Plans and Land Management Plans, tribal and cultural resources, and existing transmission infrastructure; data on National Recreation Trails from the publicly available National Recreation Trails (NRT) database; and information on siting opportunities and challenges on non-federal lands.

Agency Response: Data received from stakeholders and other suggested data layers have been incorporated into the Section 368 Energy Corridor Mapping Tool, as appropriate. GIS data has been updated throughout the project as new information was published internally and externally. However, future revisions to Section 368 corridors done through land use planning would need to verify and update GIS data at that time.

Future NEPA Analyses

One organization pointed out that the Agencies would need to conduct more detailed site-specific analyses in the future and that this could result in site-specific decisions to alter corridor routes, widths, and compatible uses. Two organizations stressed the need to include non-federal lands in the analysis, noting that continuous corridors routes (including both federal and non-federal lands) are connected actions per NEPA and that the cumulative impacts of these continuous corridors must be disclosed. The Agencies should also better address impacts on National Park Service Lands.

Agency Response: Any changes to Section 368 energy corridors would be done during the land use planning process in compliance with FLPMA and NEPA. The Agencies' legal authority to designate corridors is limited to BLM- and USFS-administered lands and relies on input to that analysis from other Federal agencies, tribes, counties, states, private landowners, and others with regard to lands under their respective jurisdiction. Through this comprehensive stakeholder engagement, the Agencies are able to consider concerns and potential issues on non-federal land, which are brought forward. The Agencies acknowledge that corridor gaps across lands under multiple jurisdictions could be more challenging to develop.

Future and Foreseeable Development

The State of Wyoming pointed out that three major electrical transmission lines have received right-of-way grants through Agency Records of Decision; future development scenarios should account for micro-siting of infrastructure associated with these projects.

Agency Response: To the extent possible, the regional review includes recently authorized projects (both within and outside of Section 368 energy corridors). Future projects would collocate with recently authorized transmission projects sited within Section 368 energy corridors and specific micro-siting of future infrastructure would be conducted at the project-specific level. Section 368 energy corridors are designated at widths that are meant to accommodate multiple transmission and pipeline projects. The regional reviews evaluated the Section 368 energy corridors at the macro-scale; micro-siting would occur at the land use planning level or during project-level review.

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Appendix E: Contemplation of Siting Principles for Potential Revisions, Deletions, or Additions to Regions 4, 5, and 6 Section 368 Energy Corridors

Contemplation of Siting Principles in Developing Potential Revisions, Deletions, or Additions to Regions 4, 5, and 6 Section 368 Energy Corridors				
Section 368 Energy Corridor No.	<i>Corridors are thoughtfully sited to provide maximum utility and minimum impact on the environment</i>	<i>Corridors promote efficient use of the landscape for necessary development</i>	<i>Appropriate and acceptable uses are defined for specific corridors</i>	<i>Corridors provide connectivity to renewable energy generation while considering other sources of generation, to balance renewable sources and ensure safety and reliability of electricity transmission</i>
<p>3-8</p> <p>Potential minor revision</p>	<p>The corridor is collocated with three transmission lines and two natural gas pipelines are within and adjacent to a portion of the corridor.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on Pacific Crest NST, Northern Spotted Owl critical habitat, the Mayfield roadless areas, the Emigrant Trail National Scenic Byway and the Four Trails Feasibility Trail.</p>	<p>The corridor provides a pathway for energy transport along existing infrastructure between Oregon and California.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Three substations are within 5 miles of the corridor.</p> <p>The potential corridor addition (Wagontire Mountain) in Oregon would connect to Corridor 3-8 (via Corridor 7-11 and Corridor 7-8), creating a critical pathway from wind energy development in Oregon to load centers in California.</p>
<p>4-247</p> <p>Potential minor revision</p>	<p>Corridor of concern for old growth forests, critical habitat, late-successional reserves, riparian reserves, and not close enough to qualified resource areas.</p> <p>At several locations throughout its length, the corridor is collocated with one to six electric transmission lines.</p>	<p>The corridor provides a major north-south pathway for energy transport through western Oregon with existing substations positioned throughout the length of the corridor.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Three power plants are within 4 miles of the corridor, two hydroelectric and one biomass. Two substations are within the corridor and 34 more substations are within 5 miles.</p>

Contemplation of Siting Principles in Developing Potential Revisions, Deletions, or Additions to Regions 4, 5, and 6 Section 368 Energy Corridors				
Section 368 Energy Corridor No.	<i>Corridors are thoughtfully sited to provide maximum utility and minimum impact on the environment</i>	<i>Corridors promote efficient use of the landscape for necessary development</i>	<i>Appropriate and acceptable uses are defined for specific corridors</i>	<i>Corridors provide connectivity to renewable energy generation while considering other sources of generation, to balance renewable sources and ensure safety and reliability of electricity transmission</i>
	The Agencies have identified potential minor adjustments that would minimize impacts on Coho Salmon critical habitat, California NHT, and Four Trails Feasibility Study Trail.			
5-201 Potential minor revision	The corridor is centered on a 500-kV transmission line for its entire length. The Agencies have identified potential minor adjustments that would minimize impacts on Coho Salmon critical habitat and Tillamook State Forest.	The corridor provides a north-south pathway for energy transport into Portland, Oregon along existing infrastructure.	Multimodal (designated for electrical transmission and pipeline projects).	One substation is within 5 miles of the corridor.
6-15 Potential minor revision	Multiple transmissions lines are within and adjacent to the entire length of the corridor. Interstate 80 is adjacent to a portion of the corridor. The Great Basin Energy transmission line would generally follow the path of the corridor. The Agencies have identified potential minor adjustments that would minimize impacts on NHTs.	The corridor provides an east-west preferred pathway for interstate energy transport, connecting the Sacramento and San Francisco metro areas with energy resources and customers in the state of Nevada and other western states.	Multimodal (designated for electrical transmission and pipeline projects).	Six hydroelectric power plants are within 3 miles of the corridor.

Contemplation of Siting Principles in Developing Potential Revisions, Deletions, or Additions to Regions 4, 5, and 6 Section 368 Energy Corridors				
Section 368 Energy Corridor No.	<i>Corridors are thoughtfully sited to provide maximum utility and minimum impact on the environment</i>	<i>Corridors promote efficient use of the landscape for necessary development</i>	<i>Appropriate and acceptable uses are defined for specific corridors</i>	<i>Corridors provide connectivity to renewable energy generation while considering other sources of generation, to balance renewable sources and ensure safety and reliability of electricity transmission</i>
7-8 Potential minor revision	<p>Four electric transmission lines are within and adjacent to the full length of the corridor. A 500-kV line is adjacent to the entire corridor.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on GRSG.</p>	<p>The corridor creates an interstate pathway between Oregon and California providing a link to other Section 368 energy corridors (Corridor 7-11 to the north, Corridor 7-24 to the east, Corridor 8-104 and Corridor 3-8 to the south).</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>A solar power plant is 4 miles west of the corridor. Three substations are within 5 miles.</p>
7-11 Potential minor revision	<p>Multiple transmission lines follow the entire length of the corridor. A 500-kV planned transmission line will follow a portion of the corridor.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on lands with wilderness characteristics and PHMA.</p>	<p>The corridor provides a link to other Section 368 energy corridors (Corridor 7-8 and Corridor 7-24 to the south and Corridor 11-103 and 11-228 to the north), creating an interstate pathway for electrical and pipeline transmission between California and Oregon. The Ruby Pipeline may provide additional connectivity.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There is interest in solar, wind, and geothermal development in the area. A solar power plant is within 4 miles.</p> <p>In addition, the potential corridor addition (Wagontire Mountain) in Oregon would connect to Corridor 7-11, creating a critical pathway from wind energy development in Oregon to load centers in California.</p>

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7-24 Potential deletion	<p>Corridor of concern for citizen-proposed wilderness, GRSG habitat, pygmy rabbit habitat, Steens Mountain Cooperative Management Area, and proposed Sheldon Mountain NWR.</p> <p>There is no existing infrastructure within the corridor and there are many environmental and other concerns. There could also be constraints due to terrain, making future development within the corridor unlikely.</p>	<p>The corridor provides an east-west pathway for energy transport across southern Oregon. The corridor connects multiple Section 368 energy corridors, creating a corridor network into California on the western end and Nevada on the eastern end.</p> <p>While the corridor provides a link to other Section 368 energy corridors, there is no demand for an east-west corridor in the area.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There is renewable energy potential (wind, geothermal, and solar) near Wagon Tire Mountain (south of Corridor 11-228 and east of Corridor 7-11). There are four solar power plants within 5 miles of the corridor.</p>
8-104 Potential minor revision	<p>Multiple transmission lines, a natural gas pipeline, and State Highway 139 are within and adjacent to portions of the corridor. A 345-kV planned transmission line, follows and runs adjacent to a portion of the corridor.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on the Damon Butte Roadless Area, the Four Trails Feasibility Study Trail and the Emigrant Trail National Scenic Byway.</p>	<p>The corridor provides a pathway for energy transport across the Modoc National Forest along existing infrastructure.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Three substations are within the corridor and nine more substations are within 5 miles of the corridor.</p>

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10-246 Potential minor revision	<p>Multiple transmission lines run along the entire length of the corridor. Local roads follow portions of the corridor.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on Sandy River WSR, Coho Salmon critical habitat, and visual resources.</p>	<p>The corridor provides a pathway for electricity transmission through Mt. Hood National Forest in Oregon into Portland.</p>	<p>Electric-only.</p>	<p>The corridor provides a viable link between energy supply and areas of high demand from Columbia River hydroelectric generation to Portland. There are two power plants within 5 miles of the corridor.</p>
11-103 Potential minor revision	<p>A 1,000-kV transmission line runs the entire length of the corridor. Three other transmission lines are within and adjacent to the corridor.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on GRSG and visual resources.</p>	<p>The corridor provides a north-south pathway for energy transport east of Bend north to private land near Prineville, Oregon. To the south, the corridor connects to multiple Section 368 energy corridors.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>A solar plant is within 1 mile of the corridor and one substation is within 5 miles.</p>
11-228 Potential minor revision	<p>Several transmission lines are within and adjacent to the corridor for portions of its length.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on lands with wilderness characteristics and visual resources.</p>	<p>The corridor provides an east-west pathway for energy transport from eastern Oregon into Idaho along existing infrastructure. The corridor connects multiple Section 368 energy corridors.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Two hydroelectric power plants are within 1 mile of the corridor, fifteen substations are within 5 miles.</p>

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15-17 No change	<p>The corridor is collocated with multiple transmission lines and natural gas pipelines that occupy portions of the corridor throughout its length. I-80 is within and adjacent to most of the corridor.</p> <p>GRSG ROW avoidance areas are not compatible with the corridor’s purpose as a preferred location for infrastructure. However, collocation is preferred and the corridor is collocated with several existing transmission lines and pipelines.</p>	<p>The corridor connects multiple Section 368 energy corridors to provide a pathway from California across northwestern Nevada.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>The corridor provides a link to the Reno and the Truckee River Industrial Center areas where renewable energy is in demand. Currently, there is one proposed PV solar project (Dodge Flat Solar) near Wadsworth, and Apple is also proposing to construct a large PV solar field on private land near Tracy that does not use public lands.</p> <p>There is the potential for future geothermal energy in the area that could tie into existing corridors.</p> <p>There are three power plants within 2 miles and twenty-three substations within 5 miles.</p>

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15-104 Potential minor revision	<p>Multiple transmission lines, natural gas pipelines, and Highway 395 are within or adjacent to the corridor.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on the NRHP site, California NHT, SRMA, visual resources, and critical habitat.</p>	<p>The corridor provides a link to multiple Section 368 energy corridors, creating a continuous corridor network across BLM- and USFS-administered lands between Reno, Nevada, and California, an important pathway for transmitting renewable energy.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There is an application for a gen-tie transmission line to connect the proposed Fish Springs Solar Project (a PV solar project that would be constructed on private lands) to the existing transmission line within the corridor.</p> <p>The proposed Bordertown to California 120 kV Transmission Line would be located at the substation at MP 5 and would utilize approximately 0.4 miles of the corridor.</p> <p>There are two power plants within 2 miles of the corridor. One substation is within the corridor and eleven are within 5 miles.</p>
16-17 Potential minor revision	<p>A 1,000-kV transmission line is within and adjacent to the entire length of the corridor and a 60-kV transmission line is within a portion of the corridor.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on WSA and visual resources.</p>	<p>The corridor provides a north south pathway for energy transport east of Pyramid Lake. The corridor connects multiple Section 368 energy corridors to provide a through western Nevada into Oregon.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>The existing geothermal plant may expand, and a small power line may be added to export energy from the geothermal plant to an existing substation.</p> <p>Three substations are within the corridor and ten more are within 5 miles.</p>

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<p>16-24</p> <p>Potential revision</p>	<p>Corridor of concern for Wilderness, NCA, National Historic Place, BLM WSA (in Oregon).</p> <p>Multiple transmission lines and I-95 are within and adjacent to portions of the corridor.</p> <p>The potential corridor extension to connect Corridor 16-24 with Corridor 24-228 would facilitate necessary connectivity parallel to the north-south highway for future energy infrastructure.</p> <p>The Agencies have identified potential revisions that would minimize potential environmental impacts by better aligning with existing infrastructure, thus minimizing disturbed area on the landscape.</p>	<p>The corridor provides a pathway for energy transport from Nevada into Oregon.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There is interest in potential solar and geothermal development in and around the Winnemucca area. The BLM is in the beginning stages of potential geothermal project re-activation (Star Peak) and project development (North Valley and Baltazor) which would need tie in connections to existing transmission lines.</p> <p>A geothermal power plant is within 3 miles of the corridor. Three substations are within the corridor and twelve more are within 5 miles.</p>

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16-104 Potential Deletion	<p>Delete the corridor because the corridor does not meet the siting principles. The corridor is also a corridor of concern for BLM Wilderness Area.</p> <p>GRSG PHMA and GHMA (ROW avoidance areas) intersect the corridor where there is no existing infrastructure and there are other corridors in the area that can meet future energy needs.</p>	<p>The corridor provides a southeast-northwest pathway for energy transport from western Nevada into northern California.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Four substations are within 5 miles of the corridor.</p>
17-18 Potential minor revision	<p>A 750-kV transmission line is within the entire length of the corridor, other lines are within and adjacent to the corridor.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on the Walker River Reservation.</p>	<p>The corridor provides a pathway for energy transport from Pyramid Lake near Carson City south to west of the Walker River Reservation. The corridor connects multiple corridors to both the north and south.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There is an existing geothermal plant at Wabuska, which may see expansion in the future. There are five power plants and thirteen substations within 5 miles of the corridor.</p> <p>The corridor is occupied by a LADWP transmission line, so future energy needs in southern California and Nevada could be served by this corridor.</p>

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17-35 Potential revision	<p>Corridor of concern for access to coal plant and impacts on GRSG habitat.</p> <p>Multiple transmission lines and natural gas pipelines are within and adjacent to the entire length of the corridor.</p> <p>The Agencies have identified a potential revision that would minimize impacts on PHMA by adding a braid at MP 136 west to collocate with the existing 230- kV transmission line until it joins with MP 195 in Region 3.</p>	<p>The corridor connects multiple West-wide energy corridors within northeastern Nevada.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>A coal plant is in the corridor gap at MP 136.</p> <p>An electric transmission line is planned to generally follow the corridor from MP 69 to MP 128. Two electric transmission lines are planned to generally follow the corridor from MP 208 to MP 300.</p>
18-23 Potential revision	<p>Corridor of concern for ACECs, IRAs, BLM WSAs, CA Boxer Wilderness, CA-and NV-proposed Wilderness, GRSG habitat, and redundant to Corridor 18-224.</p> <p>Multiple transmission lines and a DC line use the corridor in various locations. Highway 395 follows portions of the corridor.</p> <p>The Agencies have identified potential revisions by re-aligning the corridor along the DC</p>	<p>The corridor provides a north-south preferred pathway for interstate energy transport from east of Carson City, Nevada to east of Bakersfield, California. The corridor connects multiple Section 368 energy corridors from Oregon to southern California.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Most of the corridor follows an existing 1000 kV DC transmission line that serves as a crucial north-south energy transmission pathway, bringing hydropower from Oregon into areas of high demand in Los Angeles, California.</p> <p>Widening the corridor between MP 110 and MP 116 may be necessary to meet reliability standards should the existing 115-kV transmission line be upgraded into a 230-kV</p>

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	<p>transmission line where it deviates in order to preserve the energy pathway and to collocate, it would also avoid the Alabama Hills NSA.</p> <p>Restricting development to the existing ROW footprint in an environmentally sensitive area would limit future impacts while maintaining corridor utility.</p> <p>For the orderly administration of public lands, the corridor should be placed centered on the DC transmission line even though it overlaps GIS polygons for each WSA.</p>			<p>in the future. A 230-kV transmission line could increase the capacity and provide maximum flexibility for renewable energy transmission.</p> <p>Nine hydroelectric power plants are within 4 miles of the corridor.</p>

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18-224 Potential revision	<p>Multiple transmission lines occupy the corridor for portions of its length.</p> <p>The Agencies have identified potential revisions by shifting the corridor to avoid the NTTR as well as other minor adjustments to minimize impacts on visual resources, avoid a pinch point along the Hawthorne Army Ammunition Depot, tribal lands, and the town of Beatty.</p>	<p>The corridor connects multiple Section 368 energy corridor and provides a north-south pathway for energy transport, from Carson City to the Nevada Test and Training Range as well as to Las Vegas, Nevada.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There is a solar power plant within the corridor and the Amargosa Valley SEZ is adjacent. Gold Point SEZ and Miller SEZ are within 15 miles of the corridor.</p> <p>The Soda Springs Valley east of Hawthorne has potential for solar energy development. There is one existing solar project that the CCDO approved in 2015. Additional transmission capacity would be required to build new solar projects.</p>
24-228 Potential minor revision	<p>Corridor of concerns for pygmy rabbit habitat, GRSG habitat and NRHP property. A 69-kV transmission line is within and adjacent to a portion of the corridor while the Ion Highway is within the entire length of the corridor.</p> <p>The corridor crosses GHMA and PHMA, ROW avoidance areas that may not be compatible with the corridor’s purpose as a preferred location for</p>	<p>The corridor provides a pathway for energy transport from Oregon to Boise, Idaho, following Highway 95.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There is one substation within the corridor and four more within 5 miles.</p>

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	<p>infrastructure. However, the corridor is collocated with I-95.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on SRMAs and the Squaw Creek RNA ACEC while reducing overlap with specially designated areas. For the orderly administration of public lands, the corridor should be placed parallel to the highway even though it overlaps GIS polygons for each WSA.</p>			
29-36 Potential minor revision	<p>Multiple transmission lines ranging from 69- to 500-kV are within and adjacent to the full length of the corridor. Gateway West, a recently authorized 500-kV transmission line follows the corridor from MP 12 to MP 46. A natural gas pipeline generally following the corridor is planned from MP 15 to MP 63.</p> <p>The Agencies have identified potential minor adjustments that would minimize impacts on special status species and visual resources.</p>	<p>The corridor provides a pathway for energy transport from Boise into the Twin Falls are energy corridor. The southern end of the corridor connects to multiple Section 368 energy corridors</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There has been interest in development within the corridor as well as interest in solar energy in the area. Sixteen power plants are within 5 miles of the corridor.</p> <p>The potential for additional projects may be limited because of the density of existing and planned infrastructure within and adjacent to the corridor.</p>

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36-112 Potential revision	<p>2 transmission lines (230-kV and 500-kV) are within or adjacent to a portion of the corridor.</p> <p>The Agencies have identified a potential revision by re-routing the corridor along the Gateway West approved route (and existing infrastructure). This would avoid the Oregon NHT, Snake River WSR, and non-federal lands (including prime farmland) but it would increase the area of intersection with VRM Class II and GHMA.</p>	<p>The corridor connects multiple Section 368 energy corridors to create an east-west pathway for energy transport in southern Idaho along existing infrastructure.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Eighteen power plants and twenty-six substations are within 5 miles of the corridor.</p>
36-226 Potential revision	<p>A 138-kV transmission line and two natural gas pipelines run adjacent or within the entire corridor.</p> <p>The Agencies have identified a potential revision by shifting the corridor along the recently authorized Gateway West route and adding a secondary route or corridor braid along Gateway West connecting the corridor to Corridor 112-226. The potential revision would collocate and avoid sensitive areas, including the Oregon NHT, Fossil Beds</p>	<p>The corridor provides a pathway for energy transport near Twin Falls, Idaho and connects multiple Section 368 energy corridors south to Nevada and both east and west across Idaho.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There has been interest in wind energy that could support the corridor.</p> <p>Fifteen power plants and twenty-five substations are within 5 miles of the corridor.</p>

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	National Monument, and non-federal lands (including prime farmland).			
36-228 Potential revision	<p>A 500-kV transmission line and Interstate 78 are within and adjacent to portions of the corridor.</p> <p>The Agencies have identified potential revisions including re-routing the corridor to avoid private lands in Owyhee County. Option to either re-align the corridor along the approved Gateway West route or along Gateway West alternative 9E to the south.</p>	<p>The corridor provides a pathway for energy transport from Twin Falls to Boise south of the southern boundary of the Morley Nelson Snake River Birds of Prey NCA. The corridor connects to multiple Section 368 energy corridors, creating a continuous east-west interstate corridor from Oregon across Idaho.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There has been interest in development within the corridor as well as interest in solar energy in the area.</p> <p>Six power plants and seventeen substations are within 5 miles of the corridor.</p>
49-112 Potential revision	<p>A 345-kV transmission line follows the entire corridor while multiple lines are within and adjacent to portions of the corridor.</p> <p>The Agencies have identified a potential revision relocating the corridor along the authorized Gateway West route to better collocate with existing and planned infrastructure.</p>	<p>The corridor provides a pathway for energy transport through Burley, Idaho and connects to multiple Section 368 energy corridors to the west through Idaho and south to the Utah border.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There has been interest in wind energy, geothermal, and solar that could support the corridor.</p> <p>Five hydroelectric power plants are within 5 miles of the corridor.</p>

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49-202 Potential minor revision	Highway I-84 and a natural gas pipeline run adjacent to portions of the corridor. The Agencies have identified potential minor adjustments to minimize impacts on the Cedar Fields SRMA.	The corridor provides a north south pathway for energy transport from southern Idaho into Utah.	Multimodal (designated for electrical transmission and pipeline projects).	There has been interest in wind energy, geothermal and solar that could support the corridor.
50-51 Potential revision	Two transmission lines and I-15 are within and adjacent to the full length of the corridor. The Agencies have identified potential minor adjustments to better avoid non-federal lands as well as the highway while collocating with existing infrastructure.	The corridor provides a north south pathway for energy transport along Interstate 50 and connects to Corridor 50-203, creating a continuous north-south corridor network from Montana into Idaho.	Multimodal (designated for electrical transmission and pipeline projects).	There are seven substations within 5 miles of the corridor.
50-203 Potential minor revision	Three transmission lines run within and adjacent to the corridor. I-15 overlaps portions of the corridor. The Agencies have identified potential minor adjustments to minimize impacts on NHT, a WSR segment, visual resources, and the Market Lake Wildlife Management Area.	The corridor provides a north-south pathway for energy transport close to Interstate 15 and connects to multiple Section 368 energy corridors, creating a continuous corridor network from Idaho into Montana.	Multimodal (designated for electrical transmission and pipeline projects).	There is a biomass and hydroelectric power plant within 4 miles of the corridor. Two substations are within the corridor and an additional thirty-seven are within 5 miles.

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51-204 Potential revision	<p>Multiple transmission lines and a natural gas pipeline are within and adjacent to portions of the corridor. I-15 and the corridor mostly overlap.</p> <p>The Agencies have identified a potential revision rerouting the corridor to follow an existing 100-kV transmission line north to avoid the town of Boulder. Delete the corridor from MP 9 to MP 38 because there is very little federal land, and the corridor intersects with the Elkhorn Mountains ACEC.</p>	<p>The corridor provides a pathway for north-south energy transport in Montana.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Eighteen substations are within 5 miles of the corridor.</p>
51-205 Potential minor revision	<p>A 161- and 230-kV transmission line extend the full length of the corridor. Highway I-90 runs along the corridor.</p> <p>The Agencies have identified potential minor adjustments to better avoid private lands and the interstate.</p>	<p>The corridor provides a pathway for east-west energy transport east of Butte, Montana.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>A natural gas power plant is within 4 miles of the corridor.</p>

Contemplation of Siting Principles in Developing Potential Revisions, Deletions, or Additions to Regions 4, 5, and 6 Section 368 Energy Corridors				
Section 368 Energy Corridor No.	<i>Corridors are thoughtfully sited to provide maximum utility and minimum impact on the environment</i>	<i>Corridors promote efficient use of the landscape for necessary development</i>	<i>Appropriate and acceptable uses are defined for specific corridors</i>	<i>Corridors provide connectivity to renewable energy generation while considering other sources of generation, to balance renewable sources and ensure safety and reliability of electricity transmission</i>
55-240 Potential minor revision	<p>Multiple natural gas, crude oil and refined product pipelines follow a portion of the corridor. Highway I-80 follows the length of the corridor.</p> <p>The Agencies have identified potential minor adjustments to minimize impacts on NHTs.</p>	<p>The corridor provides an east-west pathway across southwestern Wyoming and connects to multiple Section 368 energy corridors to the east, providing a continuous corridor network across southern Wyoming to Cheyenne.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Three wind power plants and ten substations are within 5 miles of the corridor.</p>
73-129 Potential revision	<p>Multiple natural gas, crude oil, refined product pipelines as well as a 230-kV transmission line are within or adjacent to a portion of the corridor.</p> <p>The Agencies have identified a potential revision to shift the entire corridor along the authorized Gateway West transmission line route. It creates a preferred route for potential future energy development collocated with planned infrastructure.</p>	<p>This short distance corridor in south central Wyoming provides a crucial link between multiple Section 368 energy corridors (Corridors 129-218 and 129-221 to Corridors 73-133 and 73-138).</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>One substation within 5 miles of the corridor. The potential corridor revision provides connectivity to renewable energy generation.</p>

Contemplation of Siting Principles in Developing Potential Revisions, Deletions, or Additions to Regions 4, 5, and 6 Section 368 Energy Corridors				
Section 368 Energy Corridor No.	<i>Corridors are thoughtfully sited to provide maximum utility and minimum impact on the environment</i>	<i>Corridors promote efficient use of the landscape for necessary development</i>	<i>Appropriate and acceptable uses are defined for specific corridors</i>	<i>Corridors provide connectivity to renewable energy generation while considering other sources of generation, to balance renewable sources and ensure safety and reliability of electricity transmission</i>
73-133 No change	<p>Multiple natural gas pipelines and a refined product pipeline are within or adjacent to the corridor.</p> <p>TransWest Express and Energy Gateway South are located east of and parallel to the corridor in a new 3,500-ft Wamsutter-Powder Rim energy corridor. Two additional natural gas pipelines are planned within and adjacent to the Wyoming portion of the corridor.</p>	<p>The corridor promotes efficient use of the landscape by connecting multiple Section 368 energy corridors on both the north and south ends, creating an underground interstate pathway from Wyoming to Colorado.</p>	<p>Corridor 73-133 is underground only to allow for future pipeline development.</p>	<p>The Agencies could consider upgrading the 3,500-ft Wamsutter-Powder Rim locally designated utility corridor along the authorized TransWest Express route (west of Corridor 73-133) to a Section 368 energy corridor.</p>
73-138 Potential revision	<p>The Agencies have identified a potential revision to shift the entire corridor along the authorized Gateway West transmission line route. It creates a preferred route for potential future energy development collocated with planned infrastructure.</p>	<p>This short distance corridor in south central Wyoming provides a crucial link between multiple Section 368 energy corridors. The corridor connects Corridors 78-138 and 138-143 to Corridors 73-133 and 73-139.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Sixteen substations are within 5 miles of the corridor. The potential corridor revision provides connectivity to renewable energy generation.</p>
78-85 No Change	<p>The corridor is centered on two 115-kV electric transmission lines for its full length.</p>	<p>There are limited federal lands, but the corridor connects multiple Section 368 energy corridors to the north creating a continuous north-south corridor network in southeastern Wyoming.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There are wind development projects in the area for a portion of the corridor, but no planned projects within the corridor at this time.</p>

Contemplation of Siting Principles in Developing Potential Revisions, Deletions, or Additions to Regions 4, 5, and 6 Section 368 Energy Corridors				
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78-138 Potential revision	The Agencies have identified a potential revision to shift the entire corridor along the authorized Gateway West transmission line route. It creates a preferred route for potential future energy development collocated with planned infrastructure.	The corridor provides an east-west pathway just south of Rawlins, Wyoming. The corridor connects multiple corridors to the east and west, creating a continuous east-west corridor network through southern Wyoming.	Multimodal (designated for electrical transmission and pipeline projects).	A wind and natural gas power plant are within 1 mile of the corridor. The potential corridor revision provides connectivity to renewable energy generation.
78-255 No change	Corridor concern for GRSB core area and habitat. GRSB PHMA (ROW avoidance areas) are not compatible with the corridor’s purpose as a preferred location for infrastructure. However, the corridor is collocated with an existing transmission line and follows the recently authorized 500-kV Gateway West transmission line for its entire length.	The corridor provides a north-south pathway for energy transport in southeastern Wyoming. The corridor connects to Corridors 78-138 and 78-85 to the south.	Multimodal (designated for electrical transmission and pipeline projects).	The corridor provides an important connection to wind energy transmission. One substation is within the corridor and 8 more substations are within 5 miles.
79-216 Potential revision	Corridor of concern for GRSB core area and habitat, NRHP, and NHT. Multiple transmission lines and pipelines are within or adjacent to portions of the corridor.	This energy corridor provides north-south connectivity for interstate energy transport from Casper, Wyoming to Billings, Montana.	Multimodal (designated for electrical transmission and pipeline projects).	A wind power plant is within 4 miles of the corridor.

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	The Agencies have identified a potential revision to shift the corridor along existing infrastructure where it is not currently collocated and delete a portion where there is very little federal land.			
101-263 Potential minor revision	Corridor of concern for critical habitat, WSR, CA-proposed wilderness, citizen proposed wilderness, USFS Inventoried Roadless Area. A 115-kV transmission line and State Highway 36 follow the length of the corridor and 3 natural gas pipelines are within and adjacent to portions of the corridor. The Agencies have identified minor potential adjustments to minimize impacts on the Trinity, California National WSR.	The corridor provides an east-west pathway for energy transport in Northwestern California.	Multimodal (designated for electrical transmission and pipeline projects).	A hydroelectric power plant is within 3 miles of the corridor.

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102-105 No change	<p>Corridor of concern for “Suitable” WSR segments, designated Wilderness, critical habitat and late-successional/ adaptive management reserves, PCT, America’s Byway, NRHP.</p> <p>A 500-kV transmission line runs the entire length of the corridor, multiple other lines are within or adjacent.</p>	<p>The corridor provides a critical east-west pathway for transmitting generated energy from eastern Washington to the Puget Sound metropolitan area.</p>	<p>Multi-modal (designated for electric transmission and pipelines on BLM-administered lands), electric upgrade only on USFS-administered lands.</p>	<p>One side of the existing BPA 500 kV transmission line has capacity for upgrades on the line within the corridor, although there have been no new proposals or applications for energy infrastructure in the area.</p> <p>Sixteen substations are within 5 miles of the corridor.</p>
111-226 Potential minor revision	<p>Multiple transmission lines are within and adjacent to the entire length of the corridor.</p> <p>The Agencies have identified minor potential adjustments to minimize impacts on visual resources.</p>	<p>This energy corridor provides north-south pathway between Nevada and Idaho and connects to multiple Section 368 energy corridors, providing a continuous corridor network from Boise, Idaho to Las Vegas, Nevada.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>There has been interest in wind energy that could support the corridor.</p>
112-226 Potential minor revision	<p>A 230- and 345-kV transmission line are within and adjacent to portions of the corridor.</p> <p>The recently authorized Energy Gateway West transmission line is within the corridor for approximately the first half of the corridor. The Southwest Intertie Project North (SWIP -N) transmission line follows the corridor for most of its length.</p>	<p>The corridor provides a pathway for energy transport into the Burley and Twin Falls area. The corridor connects to multiple Section 368 energy corridors to the south, creating a continuous corridor network from Las Vegas into the Burley and Twin Falls area of Idaho. The corridor also connects to Corridors 36-226 and 36-112 which serve Idaho to the north</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Three hydroelectric power plants are within 5 miles. One biomass power plant is within 1 mile.</p>

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	The Agencies have identified minor potential adjustments to minimize impacts on GRSG and visual resources.	towards Boise and connects to Corridor 49-112, creating a corridor network to the west.		
121-220 Potential revision	<p>Three 345-kV transmission lines are centered within the corridor for its full length. The WPCI is proposed to follow this segment.</p> <p>The Agencies have identified a potential corridor revision by shifting the corridor to align with the recently authorized Gateway West route.</p>	This short corridor provides an east-west pathway in southwest Wyoming. The corridor connects multiple corridors to the east and west, creating a continuous corridor network in southern Wyoming	Electric only.	One substation is within the corridor. The potential corridor revision provides connectivity to renewable energy generation.
121-221 Potential revision	<p>Corridor of concern for GRSG core area and habitat, NHT, BLM SMA.</p> <p>Natural gas pipelines overlap with portions of the corridor. WPCI is proposed to follow a portion of this segment.</p> <p>The Agencies have identified a potential corridor revision by shifting the corridor to follow existing pipeline/infrastructure and/or WPCI to avoid undisturbed areas and overlap with GRSG PHMA. Consider</p>	<p>The corridor provides an east-west pathway for energy transport north of Rock Springs, Wyoming.</p> <p>The corridor connects to multiple Section 368 energy corridors to the east and west.</p>	Multimodal (designated for electrical transmission and pipeline projects).	Two substations are within 5 miles of the corridor.

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	<p>designating the corridor as underground only.</p> <p>The Agencies have identified minor potential adjustments to minimize impacts on visual resources, ACEC, Killpecker Sand Dunes SRMA and GRSG.</p>			
121-240 Potential deletion	<p>The Agencies have identified a potential corridor deletion. The corridor could be replaced with the Gateway West potential corridor addition.</p> <p>A portion of the corridor does not follow existing or planned infrastructure.</p>	<p>The corridor provides a northeast-southwest pathway for energy transport in southern Wyoming. The corridor connects to multiple Section 368 energy corridors on both ends.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>The potential corridor revision (along Gateway West) provides connectivity to renewable energy generation.</p>
126-218 Potential revision	<p>A 230-kV transmission line is within and adjacent to a portion of the corridor. Three natural gas pipelines and Highway 191 run along a portion of the corridor.</p> <p>The Agencies should consider deleting a portion of the corridor and revising along either existing pipeline or transmission line to the east. The potential revision would</p>	<p>The corridor provides a north-south interstate pathway for energy transport from Utah to Wyoming. The corridor connects multiple Section 368 energy corridors.</p>	<p>The corridor is designated underground only from MP 71 to MP 108, multimodal for electric transmission and pipelines from MP 108 to MP 119.</p>	<p>There is no transmission capacity in the area to accommodate wind development, so any new wind energy development would require new transmission lines. Future energy need should inform whether or not the potential revision follows the existing pipeline or transmission line.</p>

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	minimize impacts on the Flaming Gorge NCA.			
129-218 No change	<p>A crude oil pipeline and three natural gas pipelines follow portions of the corridor.</p> <p>The current location of the corridor maximizes utility and minimizes impacts through collocation.</p>	<p>The corridor provides an east-west pathway south of Rock Springs, Wyoming. The corridor connects to multiple Section 368 energy corridors, creating a continuous corridor network across southern Wyoming and into Utah.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>A Simplot Phosphates power plant and five substations are within 5 miles of the corridor.</p>
129-221 Potential revision	<p>Six natural gas pipelines, Rocky Mountain oil pipeline, and Highway I-80 run the length of the corridor.</p> <p>The Agencies have identified a potential revision to shift the entire corridor to follow the recently authorized Gateway West transmission line.</p>	<p>The short corridor provides an east-west pathway for energy transport along Interstate 80, and provides a crucial link to multiple Section 368 energy corridors to create a continuous corridor network through southern Wyoming.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Three substations are within 5 miles of the corridor.</p>
138-143 Potential deletion	<p>The Agencies have identified a potential corridor deletion. The corridor could be replaced with the Wamsutter-Powder Rim potential corridor addition.</p> <p>Corridor 138-143 does not contain existing or planned transmission lines and there are habitat concerns in the area, including mule deer migration.</p>	<p>There are two corridors (Corridor 138-143 and Corridor 73-133) that run north-south in this area, providing connectivity between Wyoming and Colorado.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	

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218-240 Potential minor revision	<p>The corridor has an existing underground pipeline ROW that pre-dates Section 368 energy corridor designation. The WPCI is proposed to follow a portion of this corridor.</p> <p>The Agencies have identified minor potential adjustments to minimize impacts on GRSG.</p>	<p>The corridor provides an east-west pathway for energy transport south of Green River, Wyoming. The corridor connects to multiple Section 368 energy corridors, creating a continuous corridor network in southern Wyoming.</p>	<p>The corridor is multimodal for electric transmission and pipelines on BLM land and underground only on USFS land.</p>	<p>There is potential for future development within the corridor, subject to possible limitations from Interstate 80 and other infrastructure congestion.</p>
219-220 No change	<p>A 230-kV transmission line extends the full length of the corridor.</p>	<p>The short corridor provides a pathway for energy transport in southern Wyoming.</p>	<p>Electric only.</p>	<p>Three substations are within 5 miles of the corridor.</p>
220-221 Potential revision	<p>The Agencies have identified a potential revision to shift the entire corridor along the recently authorized Gateway West route.</p> <p>The potential revision creates a preferred route for potential future energy development collocated with planned infrastructure.</p>	<p>The corridor provides an east-west pathway north of Rock Springs, Wyoming. The corridor connects to multiple Section 368 energy corridors, creating a continuous corridor network across southern Wyoming.</p>	<p>Electric only.</p>	<p>Wyoming has potential for significant renewable energy; however, transmission is not currently available to deliver these resources to western load centers. The potential revision provides connectivity to renewable energy generation.</p>

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229-254(S) Potential revision	<p>Corridor of concern for critical habitat, NRHP, “suitable” segment under Wild & Scenic Rivers Act, CDT, USFS Inventoried Roadless Area.</p> <p>A 100-kV transmission line is within and adjacent to most of the corridor while Highway I-90 runs along the entire corridor.</p> <p>The Agencies should consider designating the corridor as multi-modal instead of underground only since there is an existing transmission line within the corridor. The Agencies have identified a potential revision to braid the corridor to align with existing transmission rather than Interstate 90 to avoid Bull Trout critical habitat and conflicts with highway ROW.</p>	<p>The corridor provides a pathway for pipeline transport across the Lolo National Forest.</p>	<p>Underground only.</p>	<p>One substation is within the corridor and 15 more substations are within 5 miles.</p>

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229-254 Potential minor revision	<p>Corridor of concern for Critical habitat, NRHP, “suitable” segment under Wild & Scenic Rivers Act, Continental Divide NST, USFS Inventoried Roadless Area.</p> <p>Multiple transmission lines and a natural gas pipeline are within and adjacent to the corridor.</p> <p>The Agencies have identified a potential revision to shift the corridor to include more federal land and shift the corridor to existing infrastructure to avoid residential areas within the town of Boulder.</p>	<p>The corridor provides an interstate pathway for electricity transmission from Blue Creek substation into Montana. It is the most direct route to energize communities in the Silver Valley.</p>	<p>Electric only.</p>	
230-248 No change	<p>Corridor of concern for critical habitat, NRHP, PCT, Clackamas WSR and other “eligible” segments under WSR Act, conflicts with Northwest Forest Plan critical habitat and late-successional/adaptive management reserves.</p> <p>The Agencies should consider alternate routes that follow existing infrastructure while considering energy need and demand in the area.</p>	<p>The corridor provide an east-west pathway across the Cascades through Mt Hood National Forest where energy infrastructure siting can be challenging.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Two hydroelectric power plants are within 5 miles.</p>

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244-245 No change	<p>Corridor of concern for conflicts with Northwest Forest Plan, critical habitat, tracks America’s Byway.</p> <p>Multiple transmission lines are within and adjacent to the corridor.</p> <p>The USFS should consider adding lands acquired after 2009 to the corridor in future land use planning. Collocating future development closely with existing infrastructure would minimize concerns regarding steep topography and river water quality concerns.</p>	<p>The corridor provides a path for transmitting generated energy from eastern Washington to the Puget Sound metropolitan area.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	
250-251 Potential minor revision	<p>Multiple transmission lines and pipelines are within and adjacent to the corridor. Highway 84 is within the entire length of the corridor.</p> <p>The Agencies have identified minor potential adjustments to minimize impacts on the Oregon NHT and Snake River-Mormon Basin BLM Back Country Byway.</p>	<p>The corridor provides a pathway for energy transport in northeast Oregon.</p>	<p>Multimodal (designated for electrical transmission and pipeline projects).</p>	<p>Six wind and one solar power plant are within 5 miles of the corridor.</p>

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261-262 No Change	A 69- and 115-kV transmission line are within and adjacent to the entire length of the corridor.	The corridor provides a north south pathway through Shasta National Forest along Interstate 5 in California.	Electric only in Redding Field Office and Shasta-Trinity National Forest, remainder multi-modal for electric transmission and pipelines.	Two hydroelectric and one biomass power plant are within 3 miles of the corridor.
Potential Corridor Addition (Wamsutter-Powder Rim)	The potential corridor addition would follow the recently authorized TransWest Express 500 kV transmission line. The potential corridor addition would minimize potential impacts by collocating along planned infrastructure.	The corridor would provide a north-south pathway from Wyoming through Colorado.	Electric only.	The potential corridor would provide connectivity to renewable energy generation to the maximum extent possible by facilitating the transmission of renewable energy, including wind energy from Wyoming to the Desert Southwest Region and solar or other renewable energy from the Desert Southwest to the Rocky Mountain Region.
Potential Corridor Addition (Gateway West)	The potential energy corridor addition would follow the recently authorized Gateway West 500 kV transmission line. The potential energy corridor addition would minimize potential impacts on visual resources and GRSG habitat by collocating along planned infrastructure.	The potential energy corridor addition would promote efficient use of the landscape by connecting to other Section 368 energy corridors and providing an east-west pathway for electricity transmission through from Wyoming to Idaho.	Multimodal (designated for electrical transmission and pipeline projects).	The potential corridor would deliver power from existing and future electric resources (including renewable resources such as wind energy). Solar energy development in Lincoln County will be in proximity to the Gateway West transmission line, providing additional connectivity to renewable energy development.

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Potential Corridor Addition (Wagontire Mountain)	The potential energy corridor addition would run along an existing 500 kV transmission line.	The potential energy corridor addition would provide a northeast-southwest pathway from Burns, Oregon to connect to Corridor 7-11 and connect multiple Section 368 energy corridors to create a continuous corridor network in Oregon.	Multimodal (designated for electrical transmission and pipeline projects).	The potential corridor would provide connectivity to renewable energy generation to the maximum extent possible by siting a corridor near Wagon Tire Mountain where renewable energy potential is high (wind, geothermal, solar).

¹ Red corridor number indicates that this was a Corridor of Concern in the Settlement Agreement.

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Appendix F: ROW Corridor Specific Guidance

Energy Corridor Specific Guidance for Land Use Planning

1. *When Planning Requires Consideration of Energy Corridors*
2. *When Planning Requires Soliciting for New Energy Corridor Nominations*
 - 2.1 *Timing of Nominations for Consideration*
 - 2.2 *Nomination Requirements*
3. *Energy Corridor Evaluations*
 - 3.1 *Evaluating Relevance*
 - 3.2 *Evaluating Importance*
 - 3.3 *Identifying Special Management Needs*
 - 3.4 *Evaluation Determinations*
4. *Preparing Potential Corridor Information for Planning*
 - 4.1 *Naming Potential Energy Corridors*
 - 4.2 *Delineating Boundaries for Potential Energy Corridors*
 - 4.3 *Documentation of the Relevant and Important Values for Potential Energy Corridors*
 - 4.4 *Documentation of Special Management Attention for Potential Energy Corridors*
5. *Required Public Notices*
 - 5.1 *Preferred Alternative*
 - 5.2 *Public Protest*
6. *Document Specific Information for Energy Corridors in the Planning Process*
7. *Energy Corridor Analysis*
 - 7.1 *Energy Corridors in the Development of Alternatives*
 - 7.2 *Identifying Issues for Energy Corridors*
 - 7.3 *Analyzing Energy Corridors*
8. *Designating Energy Corridors*
 - 8.1 *Energy Corridors Planning Decisions*
 - 8.2 *Relationship of Energy Corridors to Other Special Designations*
9. *Implementing Energy Corridors Management*
 - 9.1 *Energy Corridors in RMP Implementation Strategies*
 - 9.2 *Evaluating Actions in Energy Corridors for Plan Conformance*
 - 9.3 *Plan Monitoring for Energy Corridors*
 - 9.4 *Energy Corridors Management Plans*

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Appendix G: GIS Data Layers in Mapping Tool

GIS Data Layers in Section 368 Energy Corridor Mapping Tool by Group and Layer

Air and Water
Priority Areas for Air Quality
Hydrology
Lake
Stream
Boundary
Surface Management Agency
USFS Regions
BLM District Boundary
BLM District Boundary Label
BLM Field Office Boundary
BLM Field Office Label
BLM Oregon and California Revested Lands
NPS Boundary
USFS Boundary
DoD Boundary
Mixed Management (Colorado)
State Boundary
State Label
County Boundary
County Label
Boundary/Public Land Survey System
Section Grid
Section Grid Label
Township/Range Grid
Township/Range Grid Label
Designated Areas
Wild and Scenic Rivers
Wild and Scenic Rivers
Wild and Scenic River Areas (USFS Data)
Wild and Scenic Study Rivers (BLM Data)
Eligible Wild and Scenic Rivers
Wilderness
Wilderness Area
Wilderness Area (USFS Data)
Wilderness Study Areas
National Conservation Areas and Similar Designations
National Scenic and Historic Trails
Juan Bautista de Anza National Historic Trail Corridor
National Historic Trails (Preliminary Data)
Juan Bautista de Anza National Historic Corridor
National Scenic Trails (Preliminary Data)
National Study Trails (Preliminary Data)

National Monuments
National Register, Landmark, Highway
National Historic Landmark
National Natural Landmark
National Register of Historic Places
National Historic Site
State Scenic Highway
National Scenic Byways/All-American Roads
Protected Areas Database (USFS GAP Analysis)
BLM Plan Allocations
Alabama Hills National Scenic Area
Areas of Critical Environmental Concern
Lands with Wilderness Characteristics
BLM Backcountry Byway
BLM DRECP California Desert National Conservation Land
BLM Plan Allocations-Recreation
Off-Highway Vehicle Open Areas, except in DRECP
SRMAs, except in California
BLM DRECP Extensive Recreation Management Areas
BLM DRECP Open Off Highway Vehicle Area
BLM DRECP Special Recreation Management Area
CA Special Recreation Management Area, not in DRECP
USFS Inventoried Roadless Areas
Management Plan Boundaries
Mt. Hood National Forest Land Resource Management Plan
NWFP Land Use Allocations 2013
BLM Resource Management Plans (Sept 2018)
BLM Resource Management Plans (Dec 2008)
USFS Land Use Plans (Dec 2008)
Other Land Use Plans (Dec 2008)
Ecological Resource Areas
Gunnison Sage-grouse Critical Habitat
ESA-Listed Species Designated Critical Habitat Areas
ESA-Listed Species Designated Critical Habitat Lines
CHAT Data
Coachella Valley MSHCP Conservation Area Boundary
Desert Tortoise Sensitive Habitat
USFWS-identified Desert Tortoise Connectivity Areas
Greater Sage grouse General Habitat Management Area
Greater Sage grouse Priority Habitat Management Area
Greater Sage-grouse Additional Habitat Management Areas
Greater Sage-grouse Proposed Critical Habitat for Bi-state Distinct Population Segment
Sagebrush Focal Area (OR)
Mohave Ground Squirrel Habitat
BLM DRECP Wildlife Allocation
Wild Horse and Burro Herd Areas
Wild Horse and Burro Herd Management Areas

Wild Horse and Burro Territories
Energy Corridor
Energy/Utility Corridor (BLM S. NV District)
Section 368 Corridor Label
Section 368 Corridor Milepost
Section 368 Corridor of Concern
Section 368 Designated Corridor (by Status and/or Mode)
Section 368 Designated Corridor Centerline
Regional Review Boundary
Energy Zones
BLM Solar Energy Zone
Solar Energy Zone Labels
BLM Arizona Renewable Energy Development Areas
BLM DRECP Development Focus Area Restricted to Solar and/or Geothermal Energy
BLM DRECP Variance Land
WGA Western Renewable Energy Zone
Infrastructure
Electric Substations
Airports
Power Plant (EIA)
Military Uses and Civilian Aviation
Weather Radar Impact Zone-4km No Build
Weather Radar Impact Zone-Mitigation
Weather Radar Impact Zone-Consultation
Weather Radar Impact Zone-Notification
Military Training Route: Instrument Route Corridor
Military Training Route: Slow Route Corridor
Military Training Route: Visual Route Corridor
Air Force High Risk of Adverse Impact Zones
Navy Force High Risk of Adverse Impact Zones
Special Use Airspace
Utah Test and Training Range
DoD-Proposed New Land Acquisition
Airfields
Oil and Gas Resources
Oil and Gas Resources
Bakken Shale Gas Play (Elevation and Isopach Contours)
Niobrara Shale Gas Play (Elevation and Isopach Contours)
Sedimentary Basins with EIA Shale Plays
Three Forks Shale gas Play Elevation Contours
Tight Oil/Shale Gas Plays
Recently Approved Transmission Projects
Boardman to Hemingway Selected Route
Gateway South Preferred Route
Gateway West Route
Southline Preferred Route
SunZia Preferred Route

TransWest Express Preferred Route
Regional Review Assessment-Potential Conflict
Regional Review Assessment: R1-Potential Conflicts
Regional Review Assessment: R2 and 3-Potential Conflicts
Regional Review Assessment: R4-6 Potential Conflicts
ROW Avoidance or Exclusion Areas
No Surface Occupancy Restriction Areas
ROW Corridors-Locally Designated
Legacy Locally Designated Corridor Area
Legacy Locally Designated Corridor Centerline
Visual Resource Areas
VRM Class I
VRM Class II
VRM Class III
VRM Class IV
Recreation Opportunity Spectrum
Scenic Integrity Objective
Visual Quality Objective
BLM DRECP National Scenic Cooperative Management Area

Appendix H: Glossary

The Glossary can be found in Chapter 6 of the Region 1 Review.

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Appendix I: References

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County of Inyo



Agricultural Commissioner - Cannabis

DEPARTMENTAL - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Nathan Reade

SUBJECT: Extension of Deadline to Meet Conditions for Commercial Cannabis Business Licenses 000123 and 000128.

RECOMMENDED ACTION:

Request Board approve Resolution No. 2021-02 titled, "A Resolution of the Board of Supervisors, County of Inyo, State of California Extending the Deadline for Commercial Cannabis Business License Requirements for Commercial Cannabis Business License Numbers 000123 and 000128," and authorize the Chairperson to sign.

SUMMARY/JUSTIFICATION:

Your board approved issuance of a commercial cannabis business license for cultivation to Chief Farms, LLC on January 8, 2019, and subsequently issued a commercial cannabis business license for a microbusiness to Chief Farms on February 12, 2019. Since this time, the licensee has applied for and is working toward completion of the conditional use permits for the parcels associated with these licenses. It has become apparent that the conditions of the licenses 000123 and 000128 will not be met by the deadline imposed by Inyo County Code subsection 5.40.090(J). This licensee is asking for your board to approve an additional one year extension to the deadline to meet license conditions.

Licenses 000123 and 000128 respectively are for cultivation in excess of 5,000 square feet and microbusiness including cultivation, manufacturing and distribution in cannabis licensing zone 5C. Current license allocation in cannabis licensing zone 5C includes 0 available licenses for cultivation in excess of 5,000 square feet and 2 licenses available for microbusiness operations.

BACKGROUND/HISTORY OF BOARD ACTIONS:

These licenses were issued on January 8 and February 12, 2019 and have not yet met the conditions required to remain valid and are not expected to be able to do so when the extension granted by your board runs out on January 8 and February 12, 2021. Conditions not yet met include completion of a conditional use permit for the parcels associated with these licenses and state licensure. Conditional use permits have been applied for through the Planning Department.

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

You board could choose to not extend the deadline for meeting conditions for licenses 000123 and 000128. This would most likely result in these businesses being delayed or not established.

OTHER AGENCY INVOLVEMENT:

FINANCING:

Approval of this extension will not have a significant impact on the Cannabis budget.

ATTACHMENTS:

1. December 2020 License Availability
2. Extension Reso Chief Farms

APPROVALS:

Nathan Reade	Created/Initiated - 12/9/2020
Darcy Ellis	Approved - 12/9/2020
Nathan Reade	Approved - 12/9/2020
Marshall Rudolph	Approved - 12/11/2020
Amy Shepherd	Final Approval - 12/14/2020



COUNTY OF INYO

COUNTY COMMERCIAL CANNABIS PERMITTING OFFICE

207 WEST SOUTH STREET
 BISHOP, CA 93514
 760.873.7860

Zone	Major Communities	Cultivation <5,000f sq. ft.	Cultivation >5,000 sq. ft.	Manufacturing Level 1	Manufacturing Level 2	Testing	Retail	Non-storefront Retail	Distributor	Microbusiness
1	Round Valley, Mustang Mesa, Dixon Lane, Meadowcreek	2		1	0	1	0	1	1	1
2	Laws	2		2		1	0	1	1	1
3	West Bishop	No Licenses Authorized in Zone 3								
4	Wilkerson, Big Pine, Independence	2		1	0	0	0	1	1	1
5A	Lone Pine, Alabama Hills	2		1	0	1	0	1	1	1
5B	Olancha, Cartago	No Licenses Authorized in Zone 5B								
5C	W. Sage Flat Road, Coso Junction, Pearsonville	0		1	0	1	1	2	1	2
5D	Keeler, Darwin	2		1	0	0	0	1	1	1
5E	Trona Area, Homewood Canyon	5		2	1	1	1	1	2	0
5F	Tecopa	9		4		1	1	1	2	2
5G	Stewart Valley, Charleston View, Sandy Valley	2	4	4		1	0	0	1	5
License Type		All Cultivation		All Manufacturing		Testing	Retailer	Non-storefront Retail	Distributor	Microbusiness
Total Number		30		18		7	3	9	11	14

RESOLUTION NO. 2021-xx

A RESOLUTION OF THE BOARD OF SUPERVISORS, COUNTY OF INYO, STATE OF CALIFORNIA EXTENDING THE DEADLINE FOR COMMERCIAL CANNABIS BUSINESS LICENSE REQUIREMENTS FOR COMMERCIAL CANNABIS BUSINESS LICENSE NUMBERS 000123 AND 000128

WHEREAS, Inyo County Code subsection 5.40.090(J) provides that commercial cannabis business licenses are issued conditionally contingent on licensees obtaining all applicable permits and licenses required by the county and/or state of California; and,

WHEREAS, Inyo County Code subsection 5.40.090(J) further provides that the County Commercial Cannabis Permit Office (C3PO) may extend this deadline up to six months; and,

WHEREAS, the Inyo County Board of Supervisors authorized the issuance of commercial cannabis business licenses currently numbered 000123 and 000128 to Chief Farms, LLC; and

WHEREAS, influences such as delays in obtaining licenses from the state of California, which are outside of the control of both the county and licensees may have affected the ability of licensees to meet conditional requirements.

NOW, THEREFORE, THE BOARD OF SUPERVISORS OF THE COUNTY OF INYO RESOLVES AS FOLLOWS:

The Inyo County Board of Supervisors extends the deadline for obtaining and submitting all applicable permits required by the county and/or state of California an additional year from the date described in the extension provided by the Inyo County Board of Supervisors for commercial cannabis business licensee Chief Farms, LLC for licenses numbered 000123 and 000128.

PASSED, APPROVED and ADOPTED this _____ day of _____, 2021, by the following vote, to wit:

AYES:

NOES:

ABSENT:

ABSTAIN:

Jeff Griffiths, Chair

Inyo County Board of Supervisors

ATTEST: Clint G. Quilter

Clerk of the Board

BY:

Darcy Ellis

Assistant Clerk of the Board



County of Inyo



Agricultural Commissioner - Cannabis

DEPARTMENTAL - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Nathan Reade

SUBJECT: Extension of Deadline to Meet Conditions for Commercial Cannabis Business License 000124.

RECOMMENDED ACTION:

Request Board approve Resolution No. 2021-03 titled, "A Resolution of the Board of Supervisors, County of Inyo, State of California Extending the Deadline for Commercial Cannabis Business License Requirements for Commercial Cannabis Business License Number 000124," and authorize the Chairperson to sign.

SUMMARY/JUSTIFICATION:

Your board approved issuance of a commercial cannabis business license to Gypsy Girl Farm and Seed Company on January 8, 2019. Since this time, the licensee has applied for and is working toward completion of the conditional use permit for the parcel associated with this license. It has become apparent that the conditions of license 000124 will not be met by the deadline imposed by Inyo County Code subsection 5.40.090(J). This licensee is asking for your board to approve an additional one year extension to the deadline to meet license conditions.

License 000124 is for cultivation in excess of 5,000 square feet in cannabis licensing zone 5C. Current license allocation in cannabis licensing zone 5C includes 0 available licenses for cultivation in excess of 5,000 square feet.

BACKGROUND/HISTORY OF BOARD ACTIONS:

This license was issued on January 8, 2019 and has not yet met the conditions required to remain valid and is not expected to be able to do so when the extension granted by your board runs out on January 8, 2021. Conditions not yet met include completion of a conditional use permit for the parcel associated with this license and state licensure. A conditional use permit has been applied for through the Planning Department.

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

You board could choose to not extend the deadline for meeting conditions for license 000124. This would most likely result in these businesses being delayed or not established.

OTHER AGENCY INVOLVEMENT:

FINANCING:

Approving this extension will have no significant impact on the cannabis budget.

ATTACHMENTS:

1. December 2020 License Availability
2. Extension Reso Gypsy

APPROVALS:

Nathan Reade

Darcy Ellis

Nathan Reade

Marshall Rudolph

Amy Shepherd

Created/Initiated - 12/9/2020

Approved - 12/10/2020

Approved - 12/10/2020

Approved - 12/11/2020

Final Approval - 12/11/2020



COUNTY OF INYO

COUNTY COMMERCIAL CANNABIS PERMITTING OFFICE

207 WEST SOUTH STREET
 BISHOP, CA 93514
 760.873.7860

Zone	Major Communities	Cultivation <5,000f sq. ft.	Cultivation >5,000 sq. ft.	Manufacturing Level 1	Manufacturing Level 2	Testing	Retail	Non-storefront Retail	Distributor	Microbusiness
1	Round Valley, Mustang Mesa, Dixon Lane, Meadowcreek	2		1	0	1	0	1	1	1
2	Laws	2		2		1	0	1	1	1
3	West Bishop	No Licenses Authorized in Zone 3								
4	Wilkerson, Big Pine, Independence	2		1	0	0	0	1	1	1
5A	Lone Pine, Alabama Hills	2		1	0	1	0	1	1	1
5B	Olancho, Cartago	No Licenses Authorized in Zone 5B								
5C	W. Sage Flat Road, Coso Junction, Pearsonville	0		1	0	1	1	2	1	2
5D	Keeler, Darwin	2		1	0	0	0	1	1	1
5E	Trona Area, Homewood Canyon	5		2	1	1	1	1	2	0
5F	Tecopa	9		4		1	1	1	2	2
5G	Stewart Valley, Charleston View, Sandy Valley	2	4	4		1	0	0	1	5
License Type		All Cultivation		All Manufacturing		Testing	Retailer	Non-storefront Retail	Distributor	Microbusiness
Total Number		30		18		7	3	9	11	14

RESOLUTION NO. 2021-xx

A RESOLUTION OF THE BOARD OF SUPERVISORS, COUNTY OF INYO, STATE OF CALIFORNIA EXTENDING THE DEADLINE FOR COMMERCIAL CANNABIS BUSINESS LICENSE REQUIREMENTS FOR COMMERCIAL CANNABIS BUSINESS LICENSE NUMBER 00124

WHEREAS, Inyo County Code subsection 5.40.090(J) provides that commercial cannabis business licenses are issued conditionally contingent on licensees obtaining all applicable permits and licenses required by the county and/or state of California; and,

WHEREAS, Inyo County Code subsection 5.40.090(J) further provides that the County Commercial Cannabis Permit Office (C3PO) may extend this deadline up to six months; and,

WHEREAS, the Inyo County Board of Supervisors authorized the issuance of a commercial cannabis business license currently numbered 000124 to Gypsy Girl Farms Seed Company; and

WHEREAS, influences such as delays in obtaining licenses from the state of California, which are outside of the control of both the county and licensees may have affected the ability of licensees to meet conditional requirements.

NOW, THEREFORE, THE BOARD OF SUPERVISORS OF THE COUNTY OF INYO RESOLVES AS FOLLOWS:

The Inyo County Board of Supervisors extends the deadline for obtaining and submitting all applicable permits required by the county and/or state of California an additional year from the date described in the extension provided by the Inyo County Board of Supervisors for commercial cannabis business licensee Gypsy Girl Farm and Seed Company for license number 000124.

PASSED, APPROVED and ADOPTED this _____ day of _____, 2021, by the following vote, to wit:

AYES:

NOES:

ABSENT:

ABSTAIN:

Jeff Griffiths, Chair

Inyo County Board of Supervisors

ATTEST: Clint G. Quilter
Clerk of the Board

BY: _____
Darcy Ellis
Assistant Clerk of the Board

RESOLUTION NO. 2021-xx

A RESOLUTION OF THE BOARD OF SUPERVISORS, COUNTY OF INYO, STATE OF CALIFORNIA EXTENDING THE DEADLINE FOR COMMERCIAL CANNABIS BUSINESS LICENSE REQUIREMENTS FOR COMMERCIAL CANNABIS BUSINESS LICENSE NUMBER 000125

WHEREAS, Inyo County Code subsection 5.40.090(J) provides that commercial cannabis business licenses are issued conditionally contingent on licensees obtaining all applicable permits and licenses required by the county and/or state of California; and,

WHEREAS, Inyo County Code subsection 5.40.090(J) further provides that the County Commercial Cannabis Permit Office (C3PO) may extend this deadline up to six months; and,

WHEREAS, the Inyo County Board of Supervisors authorized the issuance of a commercial cannabis business license currently numbered 000125 to Inyo Farms, LLC; and

WHEREAS, influences such as delays in obtaining licenses from the state of California, which are outside of the control of both the county and licensees may have affected the ability of licensees to meet conditional requirements.

NOW, THEREFORE, THE BOARD OF SUPERVISORS OF THE COUNTY OF INYO RESOLVES AS FOLLOWS:

The Inyo County Board of Supervisors extends the deadline for obtaining and submitting all applicable permits required by the county and/or state of California an additional year from the date described in the extension provided by the Inyo County Board of Supervisors for commercial cannabis business licensee Inyo Farms, LLC for license number 000125.

PASSED, APPROVED and ADOPTED this _____ day of _____, 2021, by the following vote, to wit:

AYES:

NOES:

ABSENT:

ABSTAIN:

Jeff Griffiths, Chair

Inyo County Board of Supervisors

ATTEST: Clint G. Quilter
Clerk of the Board

BY: _____
Darcy Ellis
Assistant Clerk of the Board



COUNTY OF INYO

COUNTY COMMERCIAL CANNABIS PERMITTING OFFICE

207 WEST SOUTH STREET
 BISHOP, CA 93514
 760.873.7860

Zone	Major Communities	Cultivation <5,000f sq. ft.	Cultivation >5,000 sq. ft.	Manufacturing Level 1	Manufacturing Level 2	Testing	Retail	Non-storefront Retail	Distributor	Microbusiness
1	Round Valley, Mustang Mesa, Dixon Lane, Meadowcreek	2		1	0	1	0	1	1	1
2	Laws	2		2		1	0	1	1	1
3	West Bishop	No Licenses Authorized in Zone 3								
4	Wilkerson, Big Pine, Independence	2		1	0	0	0	1	1	1
5A	Lone Pine, Alabama Hills	2		1	0	1	0	1	1	1
5B	Olancho, Cartago	No Licenses Authorized in Zone 5B								
5C	W. Sage Flat Road, Coso Junction, Pearsonville	0		1	0	1	1	2	1	2
5D	Keeler, Darwin	2		1	0	0	0	1	1	1
5E	Trona Area, Homewood Canyon	5		2	1	1	1	1	2	0
5F	Tecopa	9		4		1	1	1	2	2
5G	Stewart Valley, Charleston View, Sandy Valley	2	4	4		1	0	0	1	5
License Type		All Cultivation		All Manufacturing		Testing	Retailer	Non-storefront Retail	Distributor	Microbusiness
Total Number		30		18		7	3	9	11	14



COUNTY OF INYO

COUNTY COMMERCIAL CANNABIS PERMITTING OFFICE

207 WEST SOUTH STREET
 BISHOP, CA 93514
 760.873.7860

Zone	Major Communities	Cultivation <5,000f sq. ft.	Cultivation >5,000 sq. ft.	Manufacturing Level 1	Manufacturing Level 2	Testing	Retail	Non-storefront Retail	Distributor	Microbusiness
1	Round Valley, Mustang Mesa, Dixon Lane, Meadowcreek	2		1	0	1	0	1	1	1
2	Laws	2		2		1	0	1	1	1
3	West Bishop	No Licenses Authorized in Zone 3								
4	Wilkerson, Big Pine, Independence	2		1	0	0	0	1	1	1
5A	Lone Pine, Alabama Hills	2		1	0	1	0	1	1	1
5B	Olancho, Cartago	No Licenses Authorized in Zone 5B								
5C	W. Sage Flat Road, Coso Junction, Pearsonville	0		1	0	1	1	2	1	2
5D	Keeler, Darwin	2		1	0	0	0	1	1	1
5E	Trona Area, Homewood Canyon	5		2	1	1	1	1	2	0
5F	Tecopa	9		4		1	1	1	2	2
5G	Stewart Valley, Charleston View, Sandy Valley	2	4	4		1	0	0	1	5
License Type		All Cultivation		All Manufacturing		Testing	Retailer	Non-storefront Retail	Distributor	Microbusiness
Total Number		30		18		7	3	9	11	14

RESOLUTION NO. 2021-xx

A RESOLUTION OF THE BOARD OF SUPERVISORS, COUNTY OF INYO, STATE OF CALIFORNIA EXTENDING THE DEADLINE FOR COMMERCIAL CANNABIS BUSINESS LICENSE REQUIREMENTS FOR COMMERCIAL CANNABIS BUSINESS LICENSE NUMBER 000142

WHEREAS, Inyo County Code subsection 5.40.090(J) provides that commercial cannabis business licenses are issued conditionally contingent on licensees obtaining all applicable permits and licenses required by the county and/or state of California; and,

WHEREAS, Inyo County Code subsection 5.40.090(J) further provides that the County Commercial Cannabis Permit Office (C3PO) may extend this deadline up to six months; and,

WHEREAS, the Inyo County Board of Supervisors authorized the issuance of a commercial cannabis business license currently numbered 000142 to Old Spanish Cannabis and Commerce Park, LLC; and

WHEREAS, influences such as delays in obtaining licenses from the state of California, which are outside of the control of both the county and licensees may have affected the ability of licensees to meet conditional requirements.

NOW, THEREFORE, THE BOARD OF SUPERVISORS OF THE COUNTY OF INYO RESOLVES AS FOLLOWS:

The Inyo County Board of Supervisors extends the deadline for obtaining and submitting all applicable permits required by the county and/or state of California an additional two years from the date described in the extension provided by the Inyo County Board of Supervisors for commercial cannabis business licensee Old Spanish Cannabis and Commerce Park, LLC for license number 000142.

PASSED, APPROVED and ADOPTED this _____ day of _____, 2021, by the following vote, to wit:

AYES:

NOES:

ABSENT:

ABSTAIN:

Jeff Griffiths, Chair

Inyo County Board of Supervisors

ATTEST: Clint G. Quilter

Clerk of the Board

BY:

Darcy Ellis

Assistant Clerk of the Board



County of Inyo



Public Works

DEPARTMENTAL - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Greg Waters

SUBJECT: Fiscal Year 2020-2021 Budget Amendment and Request that the Board of Supervisors Authorize the Public Works Director to issue a Purchase Order to Procure Office Furniture for the New Office Building

RECOMMENDED ACTION:

Request the Board: A) amend the Fiscal Year 2020-2021 Consolidated Office Building Budget 011809 by increasing appropriation in Office and Other Equipment object code (5232) by \$800,000 (*4/5ths vote required*); and B) approve a purchase order in an amount not to exceed \$800,000, payable to Source Creative Office Interiors of Orange County, CA for office furnishings for the new office building at 1360 N. Main Street, Bishop, CA.

SUMMARY/JUSTIFICATION:

Inyo County has entered into an agreement with Wolverine LLC to construct a new 42,000 SF office building under a long-term lease-to-own agreement. Inyo County will need to procure a sufficient quantity of furniture to allow staff to relocate to the new building. An RFP was issued, and four proposals were returned. The bid tab sheet and the comparison spreadsheet are attached for your review. There will be some changes in scope over the next couple of weeks, hence the reason for the NTE (Not-to-Exceed) format of the requested Board authorization.

BACKGROUND/HISTORY OF BOARD ACTIONS:

Inyo County has leased space from several entities around the City Of Bishop for decades. The lost opportunity to build equity and the fractionalization of office space led to staff inefficiencies and increased costs. The decision was made a long time ago to build a new office building that would be large enough to consolidate all of the applicable Inyo County staff members under one roof.

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

The Board of Supervisors could decide not to authorize the purchase of new furniture for the new office building. The existing furniture located in present leased office space could be moved to the new location.

OTHER AGENCY INVOLVEMENT:

Auditor's Office
County Administrative Officer Office

FINANCING:

The budget amendment will allow fund balance to be utilized for the purchase of the furniture. There is sufficient fund balance to allow for this increase. The furniture will be paid out of the Consolidated Office Building Budget 011809 in the Office and Other Equipment object code #5232.

ATTACHMENTS:

1. COB Furniture Final Analysis 12-23-20 246PM With Back Up

APPROVALS:

Greg Waters	Created/Initiated - 11/24/2020
Darcy Ellis	Approved - 11/24/2020
Greg Waters	Approved - 12/22/2020
Sue Dishion	Approved - 12/28/2020
Michael Errante	Approved - 12/28/2020
Marshall Rudolph	Approved - 12/28/2020
Amy Shepherd	Approved - 12/29/2020
Denelle Carrington	Approved - 12/29/2020
Clint Quilter	Final Approval - 12/29/2020

Inyo County Public Works
Furniture Proposal Quantitative Analysis
FINAL
As of 12/23/2020 2:44 PM

			Facility Design			Source COI		
	Quantity	Units	Make & Model	\$/Unit	Total	Make & Model	\$/Unit	Total
Workstations								
Typical L-Shaped Workstation	95	Each	Herman Miller-Canvas	\$1,373.82	\$130,512.90	HON-Abound	\$1,790.00	\$170,050.00
Typical U-Shaped Workstation	29	Each	Herman Miller-Canvas	\$2,098.08	\$60,844.32	HON-Abound	\$2,325.00	\$67,425.00
Typical U-Shape Manager Station	12	Each	Herman Miller-Canvas	\$2,289.01	\$27,468.12	HON-Abound	\$2,585.00	\$31,020.00
Typical Office	45	Each	Herman Miller-Canvas	\$721.25	\$32,456.25	HON Mod	\$685.00	\$30,825.00
Straight Workstation	6	Each	Herman Miller-Canvas	\$1,505.41	\$9,032.46	HON-Abound	\$650.00	\$3,900.00
					\$260,314.05			\$303,220.00
Conference Tables								
12 Person Conference Table with (1) Power Module, Room 251, Room 129, Room 207	3	Each	Headway-Herman Miller	\$2,063.10	\$6,189.30	Clear Design 360	\$2,030.00	\$6,090.00
4 Person Conference Table with (1) Power Module, 7' x 3'-6" Room 215 & 219	2	Each	Headway-Herman Miller	\$280.75	\$561.50	Clear Design 360	\$1,235.00	\$2,470.00
8 Person Conference Table with (1) Power Module, 96" x 30" for Room 237	1	Each	Headway-Herman Miller	\$1,402.68	\$1,402.68	HON Preside	\$1,595.00	\$1,595.00
4 Person Conference Table, Room 253 & 254	2	Each	Headway-Herman Miller	\$280.75	\$561.50	Clear Design	\$290.00	\$580.00
					\$8,714.98			\$10,735.00
Interview Tables								
42" W Laminate Tables	2	Each	Everywhere-Herman Miller	\$208.75	\$417.50	HON VOI	\$340.00	\$680.00
48" W Laminate Tables	4	Each	Everywhere-Herman Miller	\$219.75	\$879.00	HON VOI	\$385.00	\$1,540.00
60" W Laminate Tables	16	Each	Everywhere-Herman Miller	\$246.50	\$3,944.00	HON VOI	\$420.00	\$6,720.00
					\$5,240.50			\$8,940.00
Chairs								
Workstation/Office Task Chairs	217	Each	(Allowance for Comparison)	\$375.00	\$81,375.00	SitonIt Torsa	\$375.00	\$81,375.00
Conference Room Chairs	60	Each	Wit-SitonIt	\$199.03	\$11,941.80	SitonIt WIT	\$210.00	\$12,600.00
Office/Interview/Extra Guest Chairs	257	Each	Freelance-SitonIt	\$171.52	\$44,080.64	SitonIt WIT Guest	\$165.00	\$42,405.00
					\$137,397.44			\$136,380.00
Training Room								
Training Room Tables	33	Each	Everywhere-Herman Miller	\$413.25	\$13,637.25	Clear Design Optima	\$410.00	\$13,530.00
Training Room Chairs	42	Each	Qwiz-SitonIt	\$197.42	\$8,291.64	SitonIt Relay	\$175.00	\$7,350.00
					\$21,928.89			\$20,880.00
Storage - Lateral File Cabinets								
Four-Drawer High Lateral File 30" Wide	8	Each	TU-Herman Miller	\$405.00	\$3,240.00	HON Brigade*	\$479.00	\$3,832.00
Four-Drawer High Lateral File 36" Wide	35	Each	TU-Herman Miller	\$455.63	\$15,947.05	HON Brigade*	\$532.00	\$18,620.00
Four-Drawer High Lateral File 42" Wide	4	Each	TU-Herman Miller	\$494.75	\$1,979.00	HON Brigade*	\$622.00	\$2,488.00
					\$21,166.05			\$24,940.00
						*HON Brigade substituted for original over spec product		
Other Costs								
Design	1	LS		\$5,200.00	\$5,200.00		\$2,625.00	\$2,625.00
On and Off Site Project Management	1	LS	Complimentary	\$0.00	\$0.00		\$1,045.00	\$1,045.00
On Site Installation Supervision	1	LS	Complimentary	\$0.00	\$0.00		\$3,990.00	\$3,990.00
Freight, Fully-Insured	1	LS	N/A	\$0.00	\$0.00		\$750.00	\$750.00
Delivery, Assembly and Installation (non-prevailing wage)	1	LS		\$137,600.00	\$137,600.00		\$112,300.00	\$112,300.00
Total Other Costs					\$142,800.00			\$120,710.00

Inyo County Public Works
Furniture Proposal Quantitative Analysis
FINAL
As of 12/23/2020 2:44 PM

			Facility Design			Source COI		
	Quantity	Units	Make & Model	\$/Unit	Total	Make & Model	\$/Unit	Total
Workstations								
Add Alternate: Breakroom Table and Chairs Rooms 125 & 239								
Table (Submit appropriate size)	2	Each	Everywhere-Herman Miller	\$1,016.91	\$2,033.82	HON VOI	\$585.00	\$1,170.00
Chairs (Submit type and quantity)	12	Each	Mika-SitonIt		Included	SitonIt OnCall	\$155.00	\$1,860.00
Labor	1	LS			Included			See Labor Below
					\$2,033.82			\$3,030.00
Add Alternate: Sofa and Tables HHS Family Interview Room 111								
8' Sofa (or close)	1	LS	Pasea-SitonIt	\$2,947.92	\$2,947.92	HON Grove	\$1,475.00	\$1,475.00
6' Sofa (or close)	1	Each	Pasea-SitonIt		Included	HON Grove	\$1,150.00	\$1,150.00
30" Round Table	1	Each	Pasea-SitonIt		Included		\$485.00	\$485.00
36" Round Table	1	Each	Pasea-SitonIt		Included		\$515.00	\$515.00
Labor	1	Each			Included			See Labor Below
					\$2,947.92			\$3,625.00
Add Alternate: Glassboards for Offices								
4' x 6'	44	Each	Magnetic Glass-Herman Miller	\$1,286.85	\$56,621.40	MooreCo	\$345.00	\$15,180.00
Accessory Tray	44	Each			Included			Included
Freight	44	Each			Included			Included
					\$56,621.40			\$15,180.00
Add Alternate: Adjustable Height Counters at Cubicles								
	124	Each	Adjustable Height Work Top	\$295.00	\$36,580.00	Adjustable Height Work Top	\$295.00	\$87,025.00
					\$36,580.00			\$87,025.00
Add Alternate: Lateral File Storage at All Cubicles								
	124	Each	Lateral File Storage	\$140.00	\$17,360.00	Lateral File Storage	\$140.00	\$19,600.00
					\$17,360.00			\$19,600.00
Subtotal					\$713,105.05			\$754,265.00
Sales Tax 7.75%					\$55,265.64			\$58,455.54
Grand Total					\$768,370.69			\$812,720.54

Inyo County Public Works
 Furniture Proposal Quantitative Analysis
 DRAFT
 As of 12/19/2020 10:28 AM

			Facility Design			Source COI			Tangram			EMID		
	Quantity	Units	Make & Model	\$/Unit	Total	Make & Model	\$/Unit	Total	Make & Model	\$/Unit	Total	Make & Model	\$/Unit	Total
Workstations														
Typical L-Shaped Workstation	95	Each	Herman Miller-Canvas	\$1,373.82	\$130,512.90	HON-Abound	\$1,790.00	\$170,050.00	Steelcase Answer	\$1,905.73	\$181,044.35		\$3,940.42	\$374,339.90
Typical U-Shaped Workstation	29	Each	Herman Miller-Canvas	\$2,098.08	\$60,844.32	HON-Abound	\$2,325.00	\$67,425.00	Steelcase Answer	\$2,626.16	\$76,158.64		\$4,028.65	\$116,830.85
Typical U-Shape Manager Station	12	Each	Herman Miller-Canvas	\$2,289.01	\$27,468.12	HON-Abound	\$2,585.00	\$31,020.00	Steelcase Answer	\$2,850.38	\$34,204.56		\$4,084.86	\$49,018.32
Typical Office	45	Each	Herman Miller-Canvas	\$721.25	\$32,456.25	HON Mod	\$685.00	\$30,825.00	Steelcase Currency	\$1,006.37	\$45,286.65		\$594.17	\$26,737.65
Straight Workstation	6	Each	Herman Miller-Canvas	\$1,505.41	\$9,032.46	HON-Abound	\$650.00	\$3,900.00	Steelcase Answer	\$882.47	\$5,294.82		\$1,186.55	\$7,119.30
					\$260,314.05			\$303,220.00			\$341,989.02			\$574,046.02
Conference Tables														
12 Person Conference Table with (1) Power Module, Room 251, Room 129, Room 207	3	Each	Headway-Herman Miller	\$2,063.10	\$6,189.30	Clear Design 360	\$2,030.00	\$6,090.00		\$2,652.66	\$7,957.98		\$1,037.94	\$3,113.82
4 Person Conference Table with (1) Power Module, 7' x 3'-6" Room 215 & 219	2	Each	Headway-Herman Miller	\$280.75	\$561.50	Clear Design 360	\$1,235.00	\$2,470.00		\$1,964.55	\$3,929.10		\$905.08	\$1,810.16
8 Person Conference Table with (1) Power Module, 96" x 30" for Room 237	1	Each	Headway-Herman Miller	\$1,402.68	\$1,402.68	HON Preside	\$1,595.00	\$1,595.00		\$1,731.00	\$1,731.00		\$532.79	\$532.79
4 Person Conference Table, Room 253 & 254	2	Each	Headway-Herman Miller	\$280.75	\$561.50	Clear Design	\$290.00	\$580.00		\$391.09	\$782.18		\$235.04	\$470.08
					\$8,714.98			\$10,735.00			\$14,400.26			\$5,926.85
Interview Tables														
42" W Laminate Tables	2	Each	Everywhere-Herman Miller	\$208.75	\$417.50	HON VOI	\$340.00	\$680.00		\$212.73	\$425.46		\$340.28	\$680.56
48" W Laminate Tables	4	Each	Everywhere-Herman Miller	\$219.75	\$879.00	HON VOI	\$385.00	\$1,540.00		\$214.77	\$859.08		\$340.28	\$1,361.12
60" W Laminate Tables	16	Each	Everywhere-Herman Miller	\$246.50	\$3,944.00	HON VOI	\$420.00	\$6,720.00		\$245.45	\$3,927.20		\$367.48	\$5,879.68
					\$5,240.50			\$8,940.00			\$5,211.74			\$7,921.36
Chairs														
Workstation/Office Task Chairs	217	Each	Lino-Herman Miller	\$332.58	\$72,169.86	SitonIt WIT	\$230.00	\$49,910.00		\$199.00	\$43,183.00		\$309.00	\$67,053.00
Conference Room Chairs	60	Each	Wit-SitonIt	\$199.03	\$11,941.80	SitonIt WIT	\$210.00	\$12,600.00		\$189.00	\$11,340.00		\$279.00	\$16,740.00
Office/Interview/Extra Guest Chairs	257	Each	Freelance-SitonIt	\$171.52	\$44,080.64	SitonIt WIT Guest	\$165.00	\$42,405.00		\$155.00	\$39,835.00		\$181.00	\$46,517.00
					\$128,192.30			\$104,915.00			\$94,358.00			\$130,310.00
Training Room														
Training Room Tables	33	Each	Everywhere-Herman Miller	\$413.25	\$13,637.25	Clear Design Optima	\$410.00	\$13,530.00		\$540.57	\$17,838.81		\$304.76	\$10,057.08
Training Room Chairs	42	Each	Qwiz-SitonIt	\$197.42	\$8,291.64	SitonIt Relay	\$175.00	\$7,350.00		\$179.00	\$7,518.00		\$103.05	\$4,328.10
					\$21,928.89			\$20,880.00			\$25,356.81			\$14,385.18
Storage - Lateral File Cabinets														
Four-Drawer High Lateral File 30" Wide	8	Each	TU-Herman Miller	\$405.00	\$3,240.00	HON Brigade*	\$479.00	\$3,832.00		\$517.61	\$4,140.88		\$475.00	\$3,800.00
Four-Drawer High Lateral File 36" Wide	35	Each	TU-Herman Miller	\$455.63	\$15,947.05	HON Brigade*	\$532.00	\$18,620.00		\$607.10	\$21,248.50		\$500.00	\$17,500.00
Four-Drawer High Lateral File 42" Wide	4	Each	TU-Herman Miller	\$494.75	\$1,979.00	HON Brigade*	\$622.00	\$2,488.00		\$680.11	\$2,720.44		\$525.00	\$2,100.00
					\$21,166.05			\$24,940.00			\$28,109.82			\$23,400.00
						*HON Brigade substituted for original over spec product								
Other Costs														
Design	1	LS		\$5,200.00	\$5,200.00		\$2,625.00	\$2,625.00		\$6,300.00	\$6,300.00		\$84,200.00	\$84,200.00
On and Off Site Project Management	1	LS	Complimentary	\$0.00	\$0.00		\$1,045.00	\$1,045.00		\$14,334.15	\$14,334.15		\$0.00	\$0.00
On Site Installation Supervision	1	LS	Complimentary	\$0.00	\$0.00		\$3,990.00	\$3,990.00		\$8,798.70	\$8,798.70		\$0.00	\$0.00
Freight, Fully-Insured	1	LS	N/A	\$0.00	\$0.00		\$750.00	\$750.00		\$0.00	\$0.00		\$0.00	\$0.00
Delivery, Assembly and Installation (non-prevailing wage)	1	LS		\$137,600.00	\$137,600.00		\$112,300.00	\$112,300.00		\$158,376.58	\$158,376.58		\$93,600.00	\$93,600.00
Total Other Costs					\$142,800.00			\$120,710.00			\$187,809.43			\$177,800.00
Add Alternate: Breakroom Table and Chairs Rooms 125 & 239														
Table (Submit appropriate size)	2	Each	Everywhere-Herman Miller	\$1,016.91	\$2,033.82	HON VOI	\$585.00	\$1,170.00		\$702.44	\$1,404.88		\$315.72	\$631.44
Chairs (Submit type and quantity)	12	Each	Mika-SitonIt		Included	SitonIt OnCall	\$155.00	\$1,860.00		\$158.33	\$1,899.96		\$107.87	\$1,294.44
Labor	1	LS			Included			See Labor Below		\$274.39	\$274.39		\$360.00	\$360.00
					\$2,033.82			\$3,030.00			\$3,579.23			\$2,285.88
Add Alternate: Sofa and Tables HHS Family Interview Room 111														
8' Sofa (or close)	1	LS	Pasea-SitonIt	\$2,947.92	\$2,947.92	HON Grove	\$1,475.00	\$1,475.00		\$1,268.06	\$1,268.06		\$537.16	\$537.16

Inyo County Public Works
Furniture Proposal Quantitative Analysis
DRAFT
As of 12/19/2020 10:28 AM

			Facility Design			Source COI			Tangram			EMID		
	Quantity	Units	Make & Model	\$/Unit	Total	Make & Model	\$/Unit	Total	Make & Model	\$/Unit	Total	Make & Model	\$/Unit	Total
Workstations														
6' Sofa (or close)	1	Each	Pasea-SitonIt		Included	HON Grove	\$1,150.00	\$1,150.00		\$1,014.96	\$1,014.96		\$383.69	\$383.69
30" Round Table	1	Each	Pasea-SitonIt		Included		\$485.00	\$485.00		\$533.53	\$533.53		\$135.94	\$135.94
36" Round Table	1	Each	Pasea-SitonIt		Included		\$515.00	\$515.00		\$609.93	\$609.93		\$245.56	\$245.56
Labor	1	Each			Included			See Labor Below		\$318.00	\$318.00		\$270.00	\$270.00
					\$2,947.92			\$3,625.00			\$3,744.48			\$1,572.35
Subtotal					\$593,338.51			\$600,995.00			\$704,558.79			\$937,647.64
Sales Tax 7.75%					\$45,983.73			\$46,577.11			\$54,603.31			\$72,667.69
Grand Total					\$639,322.24			\$647,572.11			\$759,162.10			\$1,010,315.33
Add Alternate: Glassboards for Offices														
4' x 6'	44	Each	Magnetic Glass-Herman Miller	\$1,286.85	\$56,621.40	MooreCo	\$345.00	\$15,180.00		\$630.00	\$27,720.00		\$670.47	\$29,500.68
Accessory Tray	44	Each			Included			Included		\$24.75	\$1,089.00		\$19.73	\$868.12
Freight	44	Each			Included			Included		\$29.52	\$1,298.88			Included
Labor	44	Each			Included			See Labor Below		\$6,993.27	\$6,993.27		\$45.00	\$1,980.00
					\$56,621.40			\$15,180.00			\$37,101.15			\$32,348.80
Add Alternate: Monitor Arms														
Dual Monitor Arm	217	Each	Lima-Herman Miller	\$149.72	\$32,489.24	ESI Dual Monitor Arm	\$185.00	\$40,145.00		\$190.80	\$41,403.60		\$363.60	\$78,901.20
Desk Clamp or Grommet Mounted	217	Each			Included			Included			Included			EITHER
Labor	217	Each			Included			See Labor Below		\$15,732.50	\$15,732.50		\$23.00	\$4,991.00
					\$32,489.24			\$40,145.00			\$57,136.10			\$83,892.20
Add Alternate: Keyboard Trays														
Adjustable Keyboard Tray w/Mouse Pad	217	Each	LS Series-Herman Miller	\$136.68	\$29,659.56	ESI Keyboard Tray	\$150.00	\$32,550.00		\$181.22	\$39,324.74		\$209.70	\$45,504.90
Labor	217	Each			Included			See Labor Below		\$6,533.87	\$6,533.87		\$23.00	\$4,991.00
					\$29,659.56			\$32,550.00			\$45,858.61			\$50,495.90
Add Alternate: Desk-Mounted Power Modules														
(2) USB and (2) Outlets	217	Each	Logic C1000	\$125.41	\$27,213.97	ESI Power Module	\$95.00	\$20,615.00		\$98.55	\$21,385.35		\$104.80	\$22,741.60
Labor	217	Each			Included			See Labor Below		\$4,300.94	\$4,300.94		\$11.00	\$2,387.00
					\$27,213.97			\$20,615.00			\$25,686.29			\$25,128.60
Additional Furniture Items Labor	1	LS						\$28,900.00			\$28,900.00			
								\$28,900.00						

County of Inyo Bid Tabulation
COB Office Furniture Project ZP-20-024
Bid Opening November 18th, 2020 at 3:30 PM
Location: County Administration Center

	Bidder Name	Base Bid
1	Tangram	\$450,782.22
2	Emid Design Group	\$994,680.19
3	Facility Designs	\$602,312.25 + Sales Tax = \$648,991.45
4	Source Creative	\$656,208.28
5		
6		
7		

Opened By: Darcy Ellis

Present: Greg Waters, Mike Errante



ADDENDUM NO. 2
TO THE SPECIFICATIONS FOR
COB Office Furniture Project ZP-20-024

November 13th, 2020

This addendum is being issued to notify bidders that the following changes have been made to the Project bid documents: Please see the listed changes below:

1. Question Set #1 is an attachment as part of this Addendum #2
2. A revised Pricing Worksheet in PDF format has been issued as part of this Addendum #2. An XLSX copy of this worksheet, without formulas, is available upon request.

Receipt of this addendum should be acknowledged by referencing Addendum #2 and the date of receipt of Addendum #2 on the Proposal Form. Failure to acknowledge receipt of this addendum on the Bid Proposal Form may be considered grounds for rejection of the bid.

If a bid is submitted, it should be with the understanding that the revisions contained herein are incorporated into the specifications for the COB Office Furniture and form a part of the purchase order. It is requested that Vendors that may have been given plans or specifications for this project be advised of these contract revisions.

Inyo County
Department of Public Works

Greg Waters

Greg Waters
Associate Civil Engineer

Date: November 13th, 2020

COB Office Furniture
Question Set #1
As of 11/12/2020 4:35 PM

Question	Answer
Is there elevator access?	I will confirm. Please see pricing worksheet and provide Adder if elevator unavailable.
Is there a loading dock?	No, the elevator is right inside the 6' wide front door.
Are there Wing Privacy Panels on all units?	Yes
Are samples needed in person by Wednesday?	No, the samples are only required once the project is award, or at least not until we get to a short list.
Do you need four total copies of the proposal or just one?	Just one hard copy with a wet signature
Do you want pricing for alternates (glass boards, monitor arms, etc.) included in the total price?	No, lets keep those and their respective installation labor separate. I will rework the bid sheet.
Do you want the install labor for the Adders (glass boards, monitor arms, etc.) included in the labor price?	No, I will segregate those in the bid sheet I will send out.
Do you want the physical bid in person by Wednesday Novemeber 18th at 3:30 PM? Not just electronic?	Yes, the hard copy must be received by November 18th at 3:30 PM
Is there a CAD file available?	There is a REVIT file available.
What is the preferred color scheme?	TBD, please provide the standard color palette for each product.
Where is the 6 person Conference Table? Is it a 6 FT or 8 FT table?	My error, Room 215 & Room 217. They are 4 Person Conference Tables. 7' x 3' -6"
Conference Room Tables – Where is the 8 Person Conference Table with (1) Power Module, 96"x30" for Room 237 located? Table is not shown on the floor plan in Room 237 - Copy/Wrk?	I will send of a mark-up of Room 237, but in a nutshell two cubicles that are reflected on the plans were deleted, the copier/workstation wall was moved 6' closer to the exterior wall. The conference table will land in the area between the workstation and the corridor.
Is there loading dock for a 53 FT trailer?	No
Is it possible to extend the deadline for submitting proposals to 11/25/2020	No, it would be unfair as others have been putting in a lot of hours to make the deadline.
Please confirm worksurface sizes for the Typical L Shape station. The sizes do not create 6'x8' of worksurface	The 72" x 24" Wing runs past the 30" x 72" Main Surface
Please confirm the number of U-Shaped workstations. On the plan I counted 31 but on the spreadsheet there are 29.	I will send of a mark-up of Room 237, but in a nutshell two cubicles that are reflected on the plans were deleted, the copier/workstation wall was moved 6' closer to the exterior wall. The conference table will land in the area between the workstation and the corridor.
Please confirm the number of the 6-Person Conference Tables. There are not 6-Person Conference Tabes on the plan	My error, Room 215 & Room 217. They are 4 Person Conference Tables. 7' x 3' -6"

**COB Office Furniture
Question Set #1
As of 11/12/2020 4:35 PM**

Please confirm the sizes and quantities of the Lateral file cabinets. The sizes are not noted on the plans.	Room 169 8) 30" Wide; Room 126 5) 36" Wide; Room 126 2) 42"; Room 114 5) 36"; Room 114 2) 42"; Room 115 5) 36"; Room 226 20) 36" Total quantity is 47 Units four drawer. My error.
The description for the Add Alternate: Sofa and Tables HHS Family Interview Room 111 is incorrect. Please confirm quantity of sofas and tables required for the space.	Yes, I made a cut and paste error. They are in Room 111.
Page 5/Vendor to Provide Notes - Line 1 states that four each of product color and texture samples labeled for ach type of furniture presented.	Paper copies of the brochures and product data sheets are all we need at this time. The four hard samples are after the vendor selection process is either complete or at least short-listed.
Will you do a short list interview?	Yes
Are you planning to select 1 vendor for the project or multiple vendors?	One vendor
Are you planning to provide DWG? This would be super helpful if you are looking for alternate options that would override the floorplan.	I can provide a REVIT file.
Will the decision be made on lowest price + other qualifiers?	Due to the type of product being procured, we will assess the price, quality, and other factors to arrive at a decision.
Are the 72" Training Room tables supposed to be 60" long	Yes, that is a typo on my part. I will correct and resend.

COB Office Furniture Project #ZP-20-024

Pricing Worksheet

Revised 11-12-2020

As of 11/13/2020 9:36 AM

Typical L-Shape Workstation			
6' x 8' L-Shape with Fully Powered Spines			
58" Panel Height (Including 8"H Frosted Glass Dividers)			
30 x 72 Main Surface			
24 x 42 Return Surface			
Mobile Storage Pedestal			
Supporting File/File Storage Pedestal			
L-Shape Workstation Pricing:			
	Quantity	Unit Price	Total Price
	95		
Typical U-Shape Workstation			
6' x 8' x 6' L-Shape with Fully Powered Spines			
58" Panel Height (Including 8"H Frosted Glass Dividers)			
30 x 72 Main Surface			
24 x 72 Return Surface			
24 x 48 Back Surface			
Mobile Storage Pedestal			
Supporting File/File Storage Pedestal			
U-Shape Workstation Pricing:			
	Quantity	Unit Price	Total Price
	29		
Typical U-Shape Manager Station			
6' x 8' x 8' L-Shape with Fully Powered Spines, 15" Modesty Panels Where Applicable			
58" Panel Height (Including 8"H Frosted Glass Dividers)			
30 x 72 Main Surface			
24 x 72 Return Surface			
24 x 72 Back Surface			
Supporting 2-Drawer Lateral Storage			
Supporting Box/Box/File Storage Pedestal			
U-Shape Workstation Pricing:			
	Quantity	Unit Price	Total Price
	12		
Typical Office			
6' x 6' L-shape			

COB Office Furniture Project #ZP-20-024

Pricing Worksheet

Revised 11-12-2020

As of 11/13/2020 9:36 AM

30 x 72 Main Surface with Full Modesty Panel			
24 x 42 Return Surface			
Supporting Box/Box/File Pedestal			
Supporting File/File Pedestal			
Office Pricing:	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
	45		
Straight Workstation			
6' Straight			
30 x 72 Main Surface with Full Modesty Panel			
Mobile Storage Pedestal			
Straight Workstation Pricing:	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
	6		
Conference Rooms Tables			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Extended Price</i>
12 Person Conference Table with (1) Power Module, Room 251, Room 129, Room 207	3		
4 Person Conference Table with (1) Power Module, 7' x 3'-6" Room 215 & 219	2		
8 Person Conference Table with (1) Power Module, 96" x 30" for Room 237	1		
4 Person Conference Table, Room 253 & 254	2		
Conference Room Table Pricing:			<i>Total Price</i>
Interview Tables			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Extended Price</i>
42" W Laminate Tables	2		
48" W Laminate Tables	4		
60" W Laminate Tables	16		
Interview Table Pricing:			<i>Total Price</i>
Workstation/Office Task Chairs			
Mesh Back			
Swivel Tilt Mechansim			
Height Adjustable Lumbar Support			
Height Adjustable Base			
Height Adjustable Arms			

COB Office Furniture Project #ZP-20-024

Pricing Worksheet

Revised 11-12-2020

As of 11/13/2020 9:36 AM

Carpet Casters			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Workstation/Office Task Chairs Pricing:	217		
Conference Room Chairs			
Fully Upholstered or Mesh Back			
Height Adjustable Base			
Height Adjustable Arms			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Conference Room Chair Pricing:	60		
Office/Interview/Extra Guest Chairs			
Mesh or Upholstered Back			
Fixed arms			
4-Leg Base			
Upholstered Seat			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Office/Interview/Extra Guest Chairs Pricing:	257		
Training Room Tables			
60" x 24" Nesting Flip Top Tables with Casters			
<i>Alternate price for training tables to be powered *Option* (Add/Deduct)</i>		\$0.00	\$0.00
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Training Room Tables Pricing:	33		
Training Room Chairs			
Flip/Nesting with Fixed Arms on Casters			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Training Room Chairs Pricing:	42		
Storage - Lateral File Cabinets			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Four-Drawer High Lateral File 30" Wide	8		
Four-Drawer High Lateral File 36" Wide	35		
Four-Drawer High Lateral File 42" Wide	4		
Storage - Lateral File Cabinets Pricing:			

Other Costs			
Design			
On and Off Site Project Management			
On Site Installation Supervision			
Freight, Fully-Insured			
Delivery, Assembly and Installation (non-prevailing wage)			
Other Costs - Pricing:			

Total Costs (numerical)

Total Costs (written)

Alternate: Additional costs for prevailing wages over and above base installation labor

Alternate: Additional costs for base Labor if elevator unavailable

Alternate: Additional costs for prevailing wage labor if elevator unavailable.

Add Alternate: Breakroom Table and Chairs Rooms 125 & 239

Table (Submit appropriate size)	
Chairs (Submit type and quantity)	
Labor	
Prevailing Wage Adder	

Quantity	Unit Price	Total Price
Breakroom Table and Chairs Pricing:		
	\$0.00	

Add Alternate: Sofa and Tables HHS Family Interview Room 111

8' Sofa (or close)	
6' Sofa (or close)	
30" Round Table	
36" Round Table	
Labor	

COB Office Furniture Project #ZP-20-024

Pricing Worksheet

Revised 11-12-2020

As of 11/13/2020 9:36 AM

Prevailing Wage Adder			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
HHS Family Interview Room 111 Sofa and Tables Pricing:		\$0.00	
Add Alternate: Glassboards for Offices			
4' x 6'			
Accessory Tray			
Labor			
Prevailing Wage Adder			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Glassboards for Offices Pricing:	44	\$0.00	
Add Alternate: Monitor Arms			
Dual Monitor Arm			
Desk Clamp or Grommet Mounted			
Labor			
Prevailing Wage Adder			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Monitor Arms Pricing:	217	\$0.00	
Add Alternate: Keyboard Trays			
Adjustable Keyboard Tray			
Mouse Pad			
Labor			
Prevailing Wage Adder			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Keyboard Trays Pricing:	217	\$0.00	
Add Alternate: Desk-Mounted Power Modules			
(2) USB and (2) Outlets			
Labor			
Prevailing Wage Adder			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Deskmounted Power Modules Pricing:	217	\$0.00	

ADDENDUM NO. 1
TO THE SPECIFICATIONS FOR
COB Office Furniture Project ZP-20-024

November 5th, 2020

This addendum is being issued to notify bidders that the following changes have been made to the Project bid documents: Please see the listed changes below:

The Not-To-Exceed value has been reduced from \$1,125,000.00 to \$1,000,000.00
Receipt of this addendum should be acknowledged by referencing Addendum #1 and the date of receipt of Addendum #1 on the Proposal Form. Failure to acknowledge receipt of this addendum on the Bid Proposal Form may be considered grounds for rejection of the bid.

If a bid is submitted, it should be with the understanding that the revisions contained herein are incorporated into the specifications for the COB Office Furniture and form a part of the purchase order. It is requested that Vendors that may have been given plans or specifications for this project be advised of these contract revisions.

Inyo County
Department of Public Works

Greg Waters

Greg Waters
Associate Civil Engineer

Date: November 5th, 2020

MEMORANDUM

TO: Prospective Proposers

FROM: Inyo County Public Works

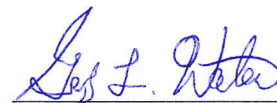
RE: Request for Proposal – **COB Office Furniture Project #ZP-20-024**

DATE: November 4th, 2020

Enclosed you will find the necessary information for preparing and submitting your proposal for ‘**COB Office Furniture Project #ZP-20-024**’

The deadline for submitting your proposal is **November 18th, 2020 at 3:30 P.M.**

If you have further questions, please email inquiries to Greg Waters at gwaters@inyocounty.us. Should it be found necessary, a written addendum will be posted on the website www.inyocounty.us/Bid_Packages.html. It will be the responsibility of interested parties to visit the website frequently to ensure receipt of any new information that may be made available. Please contact Greg Waters to be included on the List of Proposers to enable active communication regarding updates to the proposal process and potential issuance of addendum.



Greg Waters
Associate Civil Engineer

COB OFFICE FURNITURE PROJECT #ZP-20-024

REQUEST FOR PROPOSALS

RETURN PROPOSALS TO: Inyo County Board Clerk
224 N Edwards Street (if by UPS or FedEx)
P.O. Drawer N (if by US Postal service)
Independence, CA 93526.

PROPOSAL OPENING: DATE: **November 18th, 2020** TIME: **3:30 P.M.**

PRICES QUOTED F.O.B. DESTINATION TAX INCLUDED FULLY INSURED UNLESS OTHERWISE STATED. MAKE YOUR PROPOSAL OR QUOTATION IN THE SPACE PROVIDED ON THE ATTACHED SHEETS.

Any proposer who wishes their proposal to be considered is responsible for making certain that their proposal is received by the Inyo County Board Clerk by the Proposal Submittal Deadline. **NO ORAL, TELEPHONIC, TELEGRAPHIC, OR FACSIMILE PROPOSALS OR MODIFICATIONS WILL BE CONSIDERED. PROPOSALS RECEIVED AFTER THE PROPOSAL SUBMITTAL DEADLINE WILL BE REJECTED REGARDLESS OF POSTMARK DATE.**

IMPORTANT: Proposal must be sealed with 'COB Office Furniture Project #ZP-20-024' as indicated above on the outside of the envelope. Read the Instructions and Conditions before making your Proposal or Quotation.

INSTRUCTIONS & CONDITIONS

1. All prices and notations must be typewritten or written in ink. No erasures permitted. Mistakes may be crossed out and corrections made adjacent to and must be initialed in ink by person signing quotation.
2. State brand or make and model number on each item. Attach applicable product data cutsheet with a specific size and type highlighted, if multiple are listed
3. Quote on each item separately. Prices should be stated in units specified herein.
4. Each quotation must be in separate sealed envelope with proposal number on outside, and must be submitted to Inyo County Board Clerk, not later than the hour and day specified hereon, at which time it will be publicly opened and read.
5. Time of delivery is a part of the consideration and must be stated in definite terms, and must be adhered to. If time varies on different items, the proposer shall so state in the column provided, opposite each item.
6. Terms of less than ten days for cash discount will be considered as net.

7. All quotations must be signed with the Firm's name and by a responsible officer or employee. Obligations assumed by such signature must be fulfilled.
8. No charge for packing, drayage, or for any other purpose will be allowed over and above the prices quoted on this sheet.
9. The right is reserved, unless otherwise stated, to accept or reject any or all quotations, or any part thereof, either separately or as a whole, or, to waive any informality in a proposal.
10. Samples of items, when required, must be furnished free of expense to the County of Inyo and if not destroyed by tests, will upon request be returned at the proposer's expense.
11. In case of default by the vendor, the County of Inyo may procure the articles or service from other sources.
12. Cost of transportation, handling, and/or inspection on deliveries, or offers for delivery, which do not meet the specifications will be paid for by the vendor.
13. The vendor shall hold the County of Inyo, its officers, agents, servants and employees, harmless from liability of any nature or kind on account of use of any copyrighted, or uncopyrighted composition, secret process, patented or unpatented invention, article or appliance furnished or used under this quotation.
14. The vendor will not be held liable for failure or delay in fulfillment if hindered or prevented by fire, strikes, or Acts of God.
15. Quotations are subject to acceptance at any time within ninety (90) days after opening same, unless otherwise stipulated.
16. Verify your quotations before submission as they cannot be withdrawn, or corrected, after being opened.
17. Amounts paid for transportation of property to the County of Inyo are exempt from Federal Transportation Tax. An exemption certificate is not required where shipping papers show the consignee as County of Inyo, as such, papers may be accepted by the carrier as proof of the exempt character of the equipment.
18. Small businesses are entitled to contracting and or purchase preference. A small business (as defined by ordinance) is entitled to a preference if its proposal is within 5% of the base price of the low proposal received and will be treated as the low proposer.
19. Local businesses are entitled to contracting and or purchase preference. A local business (as defined by ordinance) is entitled to a preference if its proposal is within 8% based on the base price of the low proposal received and will be treated as the low proposal. To be eligible for the preferences, a local business must provide a certification that it is a local business as defined by Inyo County Code §6.06.020 (b) with its proposal.

FURNITURE PROPOSAL FORM

COB OFFICE FURNITURE PROJECT #ZP-20-024

The purpose of this specification is to describe a quality of furniture. The use of a brand name does not indicate preference for that brand. It is intended to establish a level of quality, function and reliability.

I. PROPOSAL ITEM

The County of Inyo is requesting a proposal for furniture as listed in the attachments below.

II. MINIMUM PROPOSAL SPECIFICATIONS

Sequentially number any exceptions to the specifications listed in the Proposal Sheet and explain on a separate sheet if needed.

III. EXCEPTIONS

Explain all exceptions identified in Section II, above (attach additional sheets if necessary)

NOTE: Proposal prices quoted below **MUST** include all applicable taxes and related fees, including, but not limited to sales tax.

IV. PROPOSAL

I agree to furnish Inyo County with the furniture specified on the Furniture Proposal Form

Vendor Name: _____

Contact Name: _____

Address: _____

City / State / Zip: _____

Phone Number: _____

Email Address: _____

V. **CERTIFICATION**

In submitting this proposal, I understand that Inyo County reserves the right to reject any and all proposals and/or reject any and all items of such proposals and/or waive any irregularities in a proposal. By signature on this proposal document, I agree that the furniture specified will be delivered within 60 days of receipt of an Inyo County Purchase Order. I certify that I am an authorized agent for the above vendor.

Signed: _____ Title: _____

Date: _____

VI. **PROPOSAL SUBMITTAL**

Please submit your proposal in a SEALED envelope labeled with “**COB Office Furniture Project #ZP-20-024**” and the name of the Proposer printed on the outside of the envelope.

Proposals must be submitted by the time and date specified below to the:

Inyo County Board Clerk, P.O. Drawer N, Independence, CA 93526 (BY MAIL)

Or

Inyo County Board Clerk, 224 N. Edwards Street, Independence, CA 93526 (BY UPS OR FEDEX)

by or before **November 18th, 2020 at 3:30 PM.**

Note: PLEASE BE ADVISED that despite information you may receive from mail services, “Overnight” delivery by the USPS, UPS, FedEx, and other carriers is often scheduled as a two-day delivery due to the remote nature of Inyo County.

REQUEST FOR FURNITURE PROPOSAL (RFP)

The office space consists of two stories of approximately 21,000 SF each, including circulation.

The estimated date of completion of construction is March 1st, 2021

Furniture package will need to be delivered and installed starting February 15th and completing by March 31st.

Please see the attached pricing worksheet and furniture layouts representing the 1st and 2nd Floor

PROJECT APPROACH

The project budget is set at a not to exceed value of **\$1,125,000** for all furnishings.

Bidders to submit a “look-book” representing all furniture listed in the proposal.

Acceptable product quality standards equal to HON Abound, Allsteel Terrance, Haworth Compose, Steelcase Answer, Knoll Dividends, Teknion Leverage and Herman Miller Canvas

RFP PACKAGE

Key attributes in awarding the project include:

- Design and dealer design capabilities & services
- Overall product offering
- Cost/Discount vs. Value
- Contract pricing for growth
- Ability to meet installation dates
- Durability/warranty
- Domestically manufactured

Included in this RFP are the following items:

- RFP submittal package requirements
- Pricing template
- Floorplan in PDF file format-Please note floor plan shows place holders of furniture footprints. Furniture blocks are just assumptions and dealer may override furniture floor plan.

RFP SUBMITTAL PACKAGE REQUIREMENTS

1. Vendor References and Project Qualifications.
2. Vendor scope of services with signature of President/Owner.
3. Completed pricing template showing product description, quantity, unit price, total price, lead times, delivery and installation, freight, tax and any design/PM fees. Please use the provided pricing worksheet.
4. Itemized part specifications (Bill of Materials) for typicals of private offices, workstations, conference rooms, breakrooms, training room, etc.
5. Vendor Typicals: Typicals in the product you are proposing with title blocks, isometrics and plan view, annotation of sizes, electrical etc. as well as added notes to clearly call out what is being provided.
6. Renderings of each typical.
7. Provide a furniture floor plan showing the proposed furniture workstation, private offices, conference rooms, etc. labeled with model number.
8. Look book of all proposed products (workstations, desk, file cabinets, conference rooms, training room, etc.).
9. Submit sustainable information about the product you are bidding.
10. Submit packages that provide solutions that will keep them at or below the set budget, including all other fees such as installation, freight, dealer fees, and sales tax.
11. If you feel you have a unique solution or product that is along the ideas of what we are indicating on the typical layouts and we have not listed this, please feel free to communicate those ideas in 3D and with an associated cost.

Pricing Considerations

1. Unit costs provided on proposals to be listed separately from all other fees (design time, project management, installation, freight, warehousing and tax). Please provide an Alternate Add price for prevailing wage rates on installation labor.
2. Please provide any costs associated for renderings and fly throughs.
3. Provide a fixed fee for any design time and project management you require for the design/specification part of the project.
4. No price increases will be accepted after proposal openings.
5. Inyo County will negotiate payment terms with the awarded vendor.
6. Product must meet ANSI/BIFMA Standards.

The vendor is to provide Inyo County with the following, including but not limited to:

1. Four each of product color and texture samples labeled for each type of furniture represented.
2. Four each shop drawings in hard copy and PDF format
3. Product data cut sheets
4. Product order status and delivery and installation schedule by floor and by room
5. Coordination with other trades, especially the Landlord's project superintendent, electrical foreman and electricians
6. Protection of all building and furniture surfaces from damage, including the work of others as necessary. This could mean outside drywall corners and carpeting.
7. Protection of elevator cabin, doors, and frame.
8. Full time on-site coordination by vendor representatives (Project Manager)
9. Full time on-site supervision of furniture installers (Superintendent)
10. Daily cleanup and disposal of all packing materials. Provide dumpsters for all packing materials or back-haul to warehouse. Packing materials must be removed from the building daily at a minimum and more frequently to prevent a workplace and or fire hazard.
11. All connecting pigtails and whips for power and data
12. Vendor to manage, inventory, inspect, and receive incoming shipments. This includes the costs of a forklift and operator, if necessary.

Typical L-Shape Workstation			
6' x 8' L-Shape with Fully Powered Spines			
58" Panel Height (Including 8"H Frosted Glass Dividers)			
30 x 72 Main Surface			
24 x 42 Return Surface			
Mobile Storage Pedestal			
Supporting File/File Storage Pedestal			
L-Shape Workstation Pricing:			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
	95		
Typical U-Shape Workstation			
6' x 8' x 6' L-Shape with Fully Powered Spines			
58" Panel Height (Including 8"H Frosted Glass Dividers)			
30 x 72 Main Surface			
24 x 72 Return Surface			
24 x 48 Back Surface			
Mobile Storage Pedestal			
Supporting File/File Storage Pedestal			
U-Shape Workstation Pricing:			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
	29		
Typical U-Shape Manager Station			
6' x 8' x 8' L-Shape with Fully Powered Spines			
58" Panel Height (Including 8"H Frosted Glass Dividers)			
30 x 72 Main Surface			
24 x 72 Return Surface			
24 x 72 Back Surface			
Supporting 2-Drawer Lateral Storage			
Supporting Box/Box/File Storage Pedestal			
U-Shape Workstation Pricing:			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>

COB Office Furniture Project #ZP-20-024

Pricing Worksheet

As of 11/5/2020 9:06 AM

	12		
Typical Office			
6' x 6' L-shape			
30 x 72 Main Surface with Full Modesty Panel			
24 x 42 Return Surface			
Supporting Box/Box/File Pedestal			
Supporting File/File Pedestal			
Office Pricing:	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
	45		
Straight Workstation			
6' Straight			
30 x 72 Main Surface with Full Modesty Panel			
Mobile Storage Pedestal			
Straight Workstation Pricing:	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
	6		
Conference Rooms Tables			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Extended Price</i>
12 Person Conference Table with (1) Power Module	3		
6 Person Conference Table with (1) Power Module	3		
8 Person Conference Table with (1) Power Module, 96" x 30" for Room 237	1		
4 Person Conference Table	2		
Conference Room Table Pricing:			<i>Total Price</i>
Interview Tables			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Extended Price</i>
42" W Laminate Tables	2		
48" W Laminate Tables	4		
60" W Laminate Tables	16		
			<i>Total Price</i>

Interview Table Pricing:

Workstation/Office Task Chairs			
Mesh Back			
Swivel Tilt Mechanism			
Height Adjustable Lumbar Support			
Height Adjustable Base			
Height Adjustable Arms			
Carpet Casters			
Workstation/Office Task Chairs Pricing:			
	Quantity	Unit Price	Total Price
	217		
Conference Room Chairs			
Fully Upholstered or Mesh Back			
Height Adjustable Base			
Height Adjustable Arms			
Conference Room Chair Pricing:			
	Quantity	Unit Price	Total Price
	60		
Office/Interview/Extra Guest Chairs			
Mesh or Upholstered Back			
Fixed arms			
4-Leg Base			
Upholstered Seat			
Office/Interview/Extra Guest Chairs Pricing:			
	Quantity	Unit Price	Total Price
	257		
Training Room Tables			
72" x 24" Nesting Flip Top Tables with Casters			
<i>Alternate price for training tables to be powered *Option* (Add/Deduct)</i>			
		\$0.00	\$0.00
	Quantity	Unit Price	Total Price

COB Office Furniture Project #ZP-20-024

Pricing Worksheet

As of 11/5/2020 9:06 AM

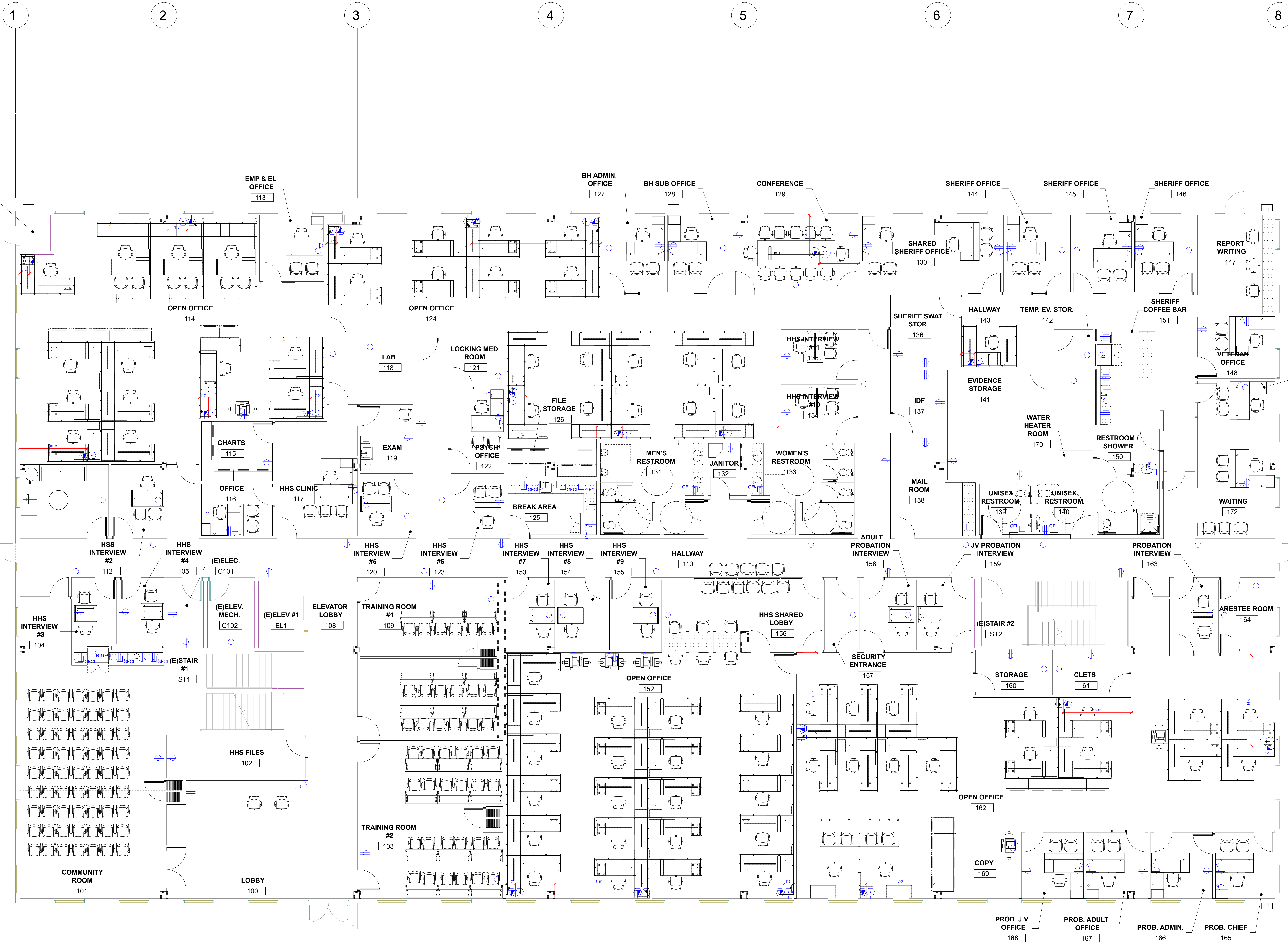
Training Room Tables Pricing:				33		
Training Room Chairs						
Flip/Nesting with Fixed Arms on Casters						
				<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Training Room Chairs Pricing:				42		
Storage - Lateral File Cabinets				<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Three-Drawer High Lateral File*						
Four-Drawer High Lateral File*				47		
*Confirm correct number of drawers						<i>Total Price</i>
Storage - Lateral File Cabinets Pricing:						
Add Alternate: Breakroom Table and Chairs Rooms 125 & 239						
Table (Submit appropriate size)						
Chairs (Submit type and quantity)						
				<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Breakroom Table and Chairs Pricing:					\$0.00	
Add Alternate: Sofa and Tables HHS Family Interview Room 111						
Dual Monitor Arm						
Desk Clamp or Grommet Mounted						
				<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
HHS Family Interview Room 111 Sofa and Tables Pricing:					\$0.00	
Add Alternate: Glassboards for Offices						
4' x 6'						
Accessory Tray						
				<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Glassboards for Offices Pricing:				44	\$0.00	

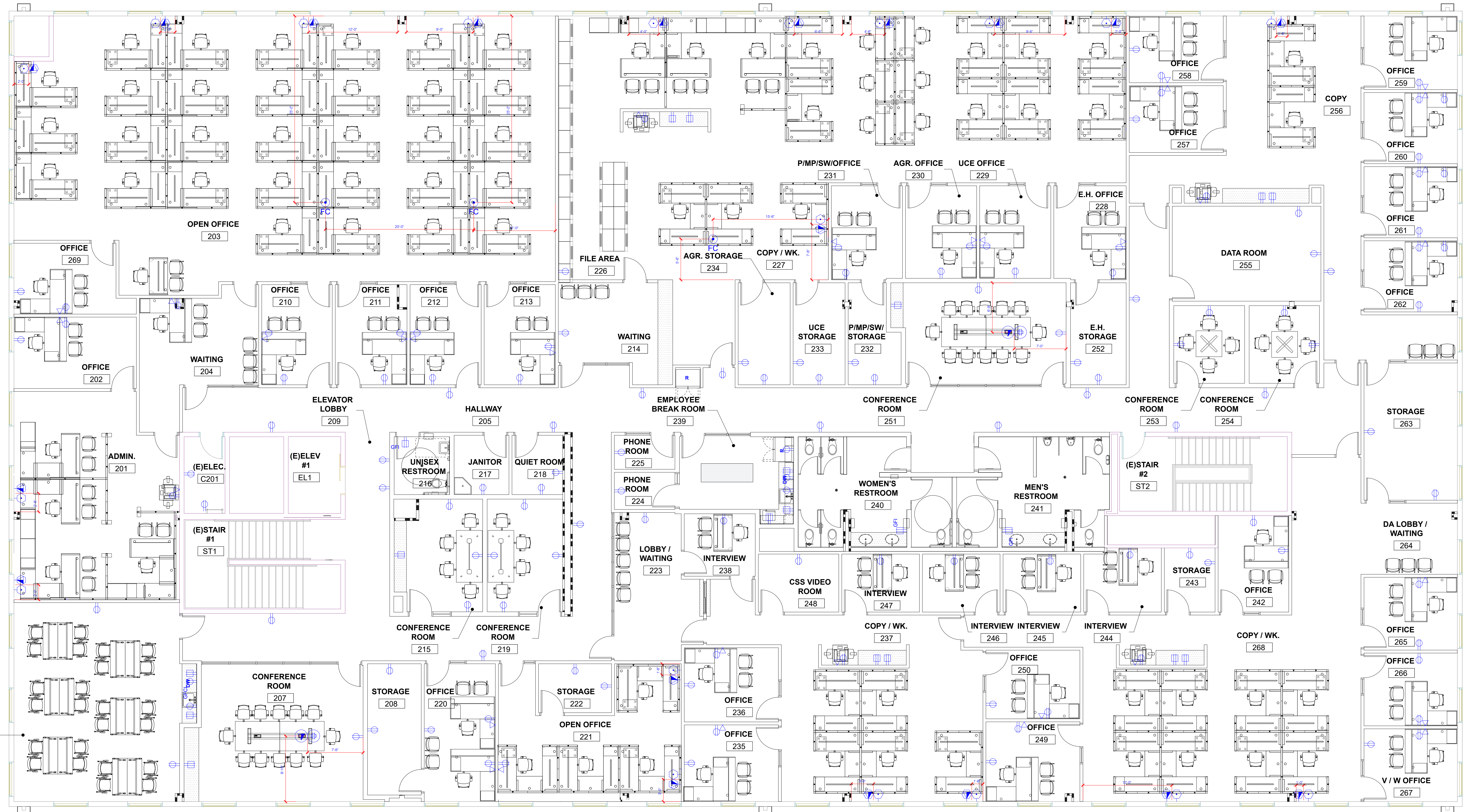
Add Alternate: Monitor Arms			
Dual Monitor Arm			
Desk Clamp or Grommet Mounted			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Monitor Arms Pricing:	217	\$0.00	
Add Alternate: Keyboard Trays			
Adjustable Keyboard Tray			
Mouse Pad			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Keyboard Trays Pricing:	217	\$0.00	
Add Alternate: Desk-Mounted Power Modules			
(2) USB and (2) Outlets			
	<i>Quantity</i>	<i>Unit Price</i>	<i>Total Price</i>
Deskmounted Power Modules Pricing:	217	\$0.00	
Other Costs			
Design			
On and Off Site Project Management			
On Site Installation Supervision			
Freight, Fully-Insured			
Delivery, Assembly and Installation (non-prevailing wage)			

Total Costs (numerical)

Total Costs (written)

Alternate: Additional costs for prevailing wages over and above base installation labor







County of Inyo



Public Works

DEPARTMENTAL - ACTION REQUIRED

MEETING: January 5, 2021

FROM:

SUBJECT: Approval of Contract Change Orders and Notice of Completion for the Taxiway Rehabilitation Project

RECOMMENDED ACTION:

Request Board:

- A) Approve the resolution ratifying the contract change orders;
- B) Approve the resolution accepting the improvements for the Taxiway Rehabilitation Project at the Bishop Airport and authorize the recording of a Notice of Completion for the Taxiway Rehabilitation Project at the Bishop Airport.

SUMMARY/JUSTIFICATION:

At the September 17, 2019 meeting of the Board of Supervisors, your Board awarded the construction contract for the Taxiway Rehabilitation Project at the Bishop Airport (Project) to Qualcon Contractors Inc. of Minden, Nevada (Qualcon) in the amount of \$4,722,055. The final construction contract amount (not including construction engineering/inspection) is \$5,034,421.46.

On October 8, 2020 the final inspection was performed, it was noted that some taxiway paint markings did not have the proper reflectivity and needed to be remarked. Corrections were completed and the project has been determined to be complete to the satisfaction of the Public Works Director and the project engineer. Accordingly, the Director is requesting that the Board adopt the Resolution ratifying contract change orders and the Resolution authorizing the recording of the Notice of Completion, which accepts the completed improvements.

In addition to formally accepting the work, the Notice of Completion begins the period during which stop notices may be placed against the work. In the event that no stop notices are filed, the retention shall be returned to the contractor.

BACKGROUND/HISTORY OF BOARD ACTIONS:

9/17/19 Board awards contract to Qualcon Contractors Inc

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

The Board could choose not to approve the resolutions. Consequently, the project and contract change orders would not be formally accepted and the Notice of Completion could not be filed. Choosing not to approve the Resolution is not recommended because it will extend the period during which stop notices can be submitted and will delay the release of retention to the Contractor.

The Board could choose not to approve the budget amendment, which would also prevent payment of the retention to the Contractor.

OTHER AGENCY INVOLVEMENT:

FAA
Caltrans Division of Aeronautics

FINANCING:

The construction contract is funded by the FAA's Airport Improvement Program, which is reimbursing the County for ninety percent (90%) of the project costs, including the cost of the change orders, and by the CDA's matching grant program, which has reimbursed the County for \$150,000 of the project costs. The County is responsible for ten percent (10%) of the contract change order costs. The reimbursable costs were paid through budget unit 630305, Bishop Air Taxiway Rehab, object code 5700, Construction in Progress; there is adequate funding in the object code to cover the contract change orders.

ATTACHMENTS:

1. 2021-1-05 BIH Taxiway Rehab Change Order Resolution
2. NOC RESOLUTION
3. Notice of Completion Bishop Airport Taxiway Rehabilitation Project

APPROVALS:

Ashley Helms	Created/Initiated - 12/8/2020
Darcy Ellis	Approved - 12/9/2020
Ashley Helms	Approved - 12/28/2020
Breanne Nelums	New - 3/30/2020
Michael Errante	
Marshall Rudolph	
Amy Shepherd	
Michael Errante	

RESOLUTION NO. 2021 - _____

**A RESOLUTION OF THE BOARD OF SUPERVISORS,
COUNTY OF INYO, STATE OF CALIFORNIA,
RATIFYING CHANGE ORDERS TO THE CONTRACT WITH QUALCON
CONTRACTORS INC FOR THE TAXIWAY REHABILITATION PROJECT AT THE
BISHOP AIRPORT**

WHEREAS, on September 17, 2019, the Inyo County Board of Supervisors awarded the contract for the Taxiway Rehabilitation Project at the Bishop Airport (“the Contract”) to Qualcon Contractors Inc (“the Contractor”) in the amount of \$4,722,055;

WHEREAS, in the course of completing the work on this Contract, additional airfield markings were required and minor design changes to Taxiway B were deemed beneficial by the County to improve drainage;

WHEREAS, the changes were agreed to by the Contractor and the Federal Aviation Administration;

WHEREAS, these modifications necessitated two change orders to the Contract as summarized below:

Contract Change Order No.	Description of Work	Amount
1	Additional airfield markings	\$1,740.00
2	Taxiway B modifications	\$81,077.50

WHEREAS, two balancing change orders were required to account for contract quantities that differed from the bid quantities:

Contract Change Order No.	Description of Work	Amount
3	Crack repair and markings	\$178,458.50
4	Asphalt, cement, slurry seal	\$51,090.46

WHEREAS, these change orders were authorized by the Inyo County Director of Public Works pursuant to the authority granted to him by Inyo County Board of Supervisors on September 17, 2020 and California Public Contract Code section 20142;

NOW THEREFORE BE IT RESOLVED:

1. That the Board of Supervisors ratifies and approves the payment of the change orders listed above pursuant to California Public Contract Code section 20142.

2. That the Board of Supervisors ratifies and approves the payment of the four change orders listed above notwithstanding any contrary provisions of the Inyo County Code, including but not limited to sections 11.05.210 and 11.05.220.

PASSED AND ADOPTED this _____ day of _____, 2021, by the following vote:

AYES: _____

NOES: _____

ABSTAIN: _____

ABSENT: _____

MATT KINGSLEY, Chairperson
Inyo County Board of Supervisors

ATTEST: Clint Quilter
Clerk of the Board

By: _____
Darcy Ellis, Assistant
Assistant Clerk of the Board

RESOLUTION #2021 - __

**A RESOLUTION OF THE BOARD OF SUPERVISORS
OF THE
COUNTY OF INYO, STATE OF CALIFORNIA
AUTHORIZING THE RECORDING OF A NOTICE OF COMPLETION
FOR THE
Bishop Airport – Taxiway Rehabilitation Project**

WHEREAS, Michael Errante, Director of the Public Works Department of the County of Inyo, has determined that the Bishop Airport – Taxiway Rehabilitation Project has been completed by Qualcon Contractors Inc., of Minden, NV in accordance with the Project Plans and Specifications.

NOW, THEREFORE, BE IT RESOLVED, that the Director of Public Works is hereby authorized and directed to sign and file with the County Recorder a separate Notice of Completion pertaining to the Bishop Airport – Taxiway Rehabilitation Project.

Passed, approved and adopted this _____ day of _____, 2021 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

Chairperson, Board of Supervisors

ATTEST:

Clint Quilter, Clerk

by _____
Assistant Clerk of the Board

**RECORDING REQUESTED BY AND
WHEN RECORDED RETURN TO:**

County of Inyo
c/o Director of Public Works
Public Works Department
168 N. Edwards Street
PO Drawer Q
Independence, CA 93526

NOTICE OF COMPLETION

NOTICE IS HEREBY GIVEN THAT:

1. A work of improvement known as the Bishop Airport – Taxiway Rehabilitation Project on the property hereinafter described, was completed on November 24, 2020 and was accepted by the Inyo County Board of Supervisors on, _____.
2. The property on which the Bishop Airport – Taxiway Rehabilitation Project has been completed is located on the grounds of Bishop Airport, Bishop, California.
3. The County of Inyo, a political subdivision of the State of California, the address of which is 224 North Edwards Street, P.O. Drawer N, Independence, CA 93526, operates and maintains the Bishop Airport.
4. The undersigned, Michael Errante, is the Director of Public Works of the County of Inyo and has been duly authorized pursuant to Resolution adopted _____, by the Board of Supervisors of the County of Inyo to execute and file this Notice of Completion.
5. The name of the original contractor that constructed the Bishop Airport – Taxiway Rehabilitation Project, pursuant to contract with the County, is Qualcon Contractors Inc., of Minden, NV.

Pursuant to the contract, the contractor was required to furnish all labor, materials, methods or processes, implements, tools, machinery, equipment, transportation services, and all other items and related functions which are necessary or appurtenant to construct the project designated in the contract.

COUNTY OF INYO

Dated: _____

By: _____

VERIFICATION

STATE OF CALIFORNIA)
) SS.
COUNTY OF INYO)

I, Michael Errante, hereby declare: That I am the Director of Public Works for the County of Inyo, a political subdivision of the State of California, the public entity on behalf of which I executed the foregoing NOTICE OF COMPLETION for the Bishop Airport – Taxiway Rehabilitation Project, and which entity is the owner of the aforesaid interest or estate in the property therein described; that I am authorized by the public entity to execute this NOTICE on the entity’s behalf; that I am authorized to and hereby make this verification on behalf of the public entity; and that I have read said NOTICE and know the contents thereof. I declare under penalty of perjury under the laws of the State of California that the NOTICE and the information set forth therein are true and correct.

Dated: _____

Michael Errante, PE, Public Works Director



County of Inyo



Health & Human Services

WORKSHOPS AND PRESENTATIONS - NO ACTION REQUIRED

MEETING: January 5, 2021

FROM: Meaghan McCamman

SUBJECT: Statewide Medi-Cal Managed Care Procurement Workshop

RECOMMENDED ACTION:

Request Board: A) conduct workshop with HHS staff on the Statewide Medi-Cal Managed Care Procurement and Potential Impacts to Inyo County; and B) provide follow-up direction to staff as necessary.

SUMMARY/JUSTIFICATION:

Beginning in late 2013, California's Medi-Cal program expanded managed care into 28 primarily rural counties, including Inyo and Mono counties. The 2013 expansion of managed care completed the transformation of California's Medi-Cal program from fee-for-service delivery (state management and payment of claims for services submitted by providers) to managed care (state contracting with public and private health plans that arrange and pay for services.)

The state has implemented a variety of managed care models over the years, including County Organized Health Systems (COHS), in which one public plan serves an entire county, the Two-Plan Model, which provides beneficiaries a choice between a private and public plan, a Geographic Managed Care Model, which offers a wide variety of plan options, and, in Inyo County and in other very remote rural areas, the Regional model, served by two commercial health plans. Inyo's commercial health plans are Anthem Blue Cross and California Health and Wellness (owned by Health Net).

After several years and lessons learned, the state Department of Health Care Services is preparing a mass procurement of private/commercial Medi-Cal managed care plans. Many small rural counties served by the Regional Model are looking at this procurement as an opportunity to move to a different managed care model –specifically COHS or a Two-Plan model, both of which include a locally-governed, public health plan. While many Northern California counties are looking to join Partnership Health Plan, and those on the West side of the Sierra Nevada are in conversations with the Health Plan of San Joaquin, Inyo County HHS has begun exploratory conversations with the Inland Empire Health Plan, which serves San Bernardino and Riverside Counties.

The attached documents provide additional background on Medi-Cal managed care, the 2013 expansion to the rural counties, and a State Auditor report about oversight of the Regional Model counties. HHS staff will provide background information on the Medi-Cal data for Inyo County, information about conversations with Inland

Empire Health Plan, and would like Board direction regarding next steps.

BACKGROUND/HISTORY OF BOARD ACTIONS:

NA

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

NA

OTHER AGENCY INVOLVEMENT:

NA

FINANCING:

NA

ATTACHMENTS:

1. Close Look at Medi-Cal Managed Care Regional Model
2. California State Auditor Report - Reasonable Access to Care
3. Medi-Cal Managed Care An Overview and Key Issues
4. Medi-Cal Brings Managed Care to California's Rural Counties

APPROVALS:

Rhiannon Baker

Darcy Ellis

Meaghan McCamman

Marilyn Mann

Created/Initiated - 12/16/2020

Approved - 12/16/2020

Approved - 12/16/2020

Final Approval - 12/17/2020



A Close Look at Medi-Cal Managed Care: Quality, Access, and the Provider's Experience Under the Regional Model

OCTOBER 2019



AUTHORS

Matthew Newman, Len Finocchio, and Shawn Blosser
Blue Sky Consulting Group

Contents

About the Authors

Matthew Newman is a founding partner with the Blue Sky Consulting Group. He earned his Master of Public Policy Degree from Harvard University's John F. Kennedy School of Government. Len Finocchio leads the Blue Sky Consulting Group's health care practice. He earned his Doctorate in Public Health from the University of Michigan. Shawn Blosser leads the Blue Sky Consulting Group's data analysis team. He earned his bachelor's degree from Stanford University and did graduate work in economics at the University of Chicago.

Acknowledgments

The authors would like to acknowledge the expert contributions to this paper of Athena Chapman, MPP, Caroline Davis, MPP, and Jill Yegian, PhD.

About the Foundation

The California Health Care Foundation is dedicated to advancing meaningful, measurable improvements in the way the health care delivery system provides care to the people of California, particularly those with low incomes and those whose needs are not well served by the status quo. We work to ensure that people have access to the care they need, when they need it, at a price they can afford.

CHCF informs policymakers and industry leaders, invests in ideas and innovations, and connects with changemakers to create a more responsive, patient-centered health care system.

For more information, visit www.chcf.org.

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Executive Summary

Medi-Cal enrollees in 18 rural counties in California receive care under Medi-Cal's Regional model of managed care, in which enrollees have the option of choosing between one of two commercial managed care plans (MCPs). The Department of Health Care Services (DHCS) intends to re-procure all of the commercial Medi-Cal MCPs statewide beginning in 2020, with implementation for the Regional model scheduled for January 2024.¹ This procurement provides an opportunity to review and evaluate the ways in which managed care is implemented in California, to incentivize improvements in MCP performance leading up to the procurement, and to develop and implement specific improvements under new contracts with MCPs following the procurement.

This report examines the performance of the two Regional model MCPs. It compares access to care, quality of care, and both patients' and providers' satisfaction with MCPs in Regional model counties with (1) a "rural comparison" group consisting of 14 other rural counties in California and (2) the "PHC north" group, which includes seven of these rural comparison group counties that joined Partnership HealthPlan of California (PHC) as part of the Medi-Cal rural expansion in 2013. The data analyzed for this report include the following: qualitative data collected through structured interviews with providers, county officials, and MCP representatives; quantitative data from surveys and measures of access and quality; and data from a recent report by the California State Auditor, which conducted an audit of the oversight by DHCS of Regional model MCPs.²

Results

Rural Californians struggle with health care challenges unique to their setting. The state's rural areas tend to have fewer health care providers relative to more urban areas, and many patients need to travel long distances in order to obtain certain types of specialty care. Within the state's rural areas, however, important differences exist. Compared with rural comparison

counties, Medi-Cal enrollees residing in Regional model counties have received somewhat poorer quality of care, have greater difficulty accessing specialty care, and are less satisfied with their health care. The rate of improvement in health care quality and access to primary care has been somewhat better for Medi-Cal enrollees in Regional model counties than for enrollees in the rural comparison group (findings from the comparison of the Regional model with PHC north are presented in the full paper).

Key findings of the analysis include the following:

- ▶ **Medi-Cal enrollees' access to primary care in Regional model counties is comparable to that in other rural regions.** On a survey of Medi-Cal MCP members, those enrolled in the two Regional model MCPs were, on average, more likely to report that they get care quickly and have a usual source of care than those enrolled in MCPs in the rural comparison group. However, Regional model MCP members were somewhat more likely to report that they had difficulty accessing primary care.
- ▶ **Access to specialty care is difficult for Medi-Cal enrollees in Regional model counties.** Many providers in these counties indicated that limited specialty care networks hindered their ability to deliver effective patient care and reported that the commercial MCPs had not invested in attracting and retaining specialty care providers. These providers also indicated that patients had difficulty accessing some benefits, such as the transportation or mild-to-moderate mental health benefits. Analysis of survey data suggests that Medi-Cal enrollees in Regional model counties are somewhat more likely to report difficulty accessing specialty care than residents of other rural areas of the state. Moreover, some enrollees in Regional model counties need to travel very long distances to access care when compared with enrollees in other rural areas.³ State administrative data on network adequacy are of limited value in assessing whether patients are able to access the care they need.

► **The quality of care provided to Medi-Cal enrollees in Regional model MCPs was worse, on average, than for Medi-Cal enrollees of MCPs in other rural counties.** Although the differences were relatively small in percentage terms, the two Regional model MCPs scored, on average, well below the statewide average, whereas the MCPs in the rural comparison group scored, on average, above the statewide average. Quality scores have, however, been improving more rapidly in Regional model counties relative to rural comparison group counties.

► **Overall Medi-Cal enrollee satisfaction with MCP performance was lower in Regional model counties relative to other rural regions of the state.** On the measure of “Rating of All Health Care,” Medi-Cal MCPs in Regional model counties scored worse than Medi-Cal MCPs in the rural comparison group counties.

► **Many providers and county officials in Regional model counties are concerned with the performance of the two Regional model MCPs.** Many providers expressed frustrations with the responsiveness of the MCPs in addressing patient and provider needs. They noted increased demands for staff resources needed to secure pre-authorizations and handle billing and other managed care administrative tasks. They also reported that the MCPs frequently denied claims and were slow to pay approved claims, which put a financial strain on providers.

► **Representatives of the two MCPs serving the Regional model counties said they were taking steps to address the concerns that had been raised by stakeholders.** Representatives from Anthem Blue Cross (Anthem) and California Health & Wellness (CHW) indicated they had sought to increase staff resources dedicated to Regional model counties, respond to provider concerns, reduce the number of procedures requiring pre-authorization, expand the specialty care network, and increase access to telehealth and other electronic means of accessing care.

Considerations for Improvement

This assessment of quality and access to care in Medi-Cal’s Regional model of managed care shows mixed results. Compared with MCPs in other rural regions of the state, MCPs serving Medi-Cal enrollees in the 18 Regional model counties performed better on some measures of access and quality (e.g., primary care access) and worse on others (e.g., specialty care access). What is clear, however, is that provider dissatisfaction is greater in Regional model counties. This should not be ignored: Research suggests that provider satisfaction is an important component of effective patient care and that, conversely, burnout or provider dissatisfaction can lead to poorer patient outcomes.⁴

To ensure that Medi-Cal enrollees in the 18 Regional model counties receive access to timely, high-quality care, state policymakers and program officials should conduct additional research on the nature and extent of provider dissatisfaction and undertake careful monitoring of patient satisfaction, care quality, and health outcomes in Regional model counties. In addition, this assessment identified several opportunities for improvement that could be implemented by the MCPs or by DHCS. These include the following:

- Developing a regional health care provider recruitment strategy
- Increasing use of telehealth and other electronic mechanisms for accessing care
- Improving communication among MCPs, providers, and counties to address challenges associated with having MCPs headquartered outside of the region
- Involving DHCS or another neutral third party in discussions between MCPs and providers regarding unresolved contracting issues
- Developing and enforcing more meaningful network adequacy standards
- Requiring MCPs and their delegates to deploy a valid, reliable, and standardized provider satisfaction survey annually

Finally, some providers in Regional model counties have expressed an interest in changing managed care delivery models, with most indicating a desire to participate in a public MCP, either a County Organized Health System (COHS) or a Local Initiative (LI) as part of a Two-Plan model. Several important obstacles to COHS expansion may limit the ability of counties to change Medi-Cal managed care models, including a federally imposed cap on the number of COHSs and a cap on the percentage of Medi-Cal enrollees who can participate in a COHS. Forming a regional LI or drawing one into the 18-county region might face fewer regulatory obstacles but would still involve significant effort. Regardless of which path is taken, policymakers, program officials, and local stakeholders should take steps in the near term to improve provider satisfaction, hold MCPs accountable for meeting access and quality requirements, and expand the health care workforce in rural counties.

Introduction

In 2013, the state Department of Health Care Services (DHCS) continued the Medi-Cal program shift from traditional fee-for-service to managed care, transitioning a group of largely rural Northern California counties into managed care delivery models. Some of these Northern California counties joined Partnership HealthPlan of California (PHC), an existing County Organized Health System (COHS). Eighteen of the remaining counties were part of a new “Regional model” of managed care delivery created by DHCS. DHCS contracted with Anthem Blue Cross (Anthem) and California Health & Wellness (CHW) to serve these Regional model counties.

This study analyzed the experience of patients and providers in Regional model counties during the period following the transition to managed care and compared those experiences with the outcomes in comparable counties. Specifically, this report examined available data on managed care plan (MCP) quality, access to care, and patient experience as well as qualitative information from interviews with providers, MCPs, and others in order to develop an

assessment of the Regional model. Its intent is to identify opportunities for improvement and to inform the procurement process for commercial MCPs that DHCS will begin in 2020 with the scheduled release of its Request for Proposals.⁵ This procurement is an opportunity to reshape and strengthen the program to accelerate improvements in access to care, quality, consumer experience, and health outcomes.

Issues in Rural Health Care

Rural patients face unique health challenges. Rates for the five leading causes of death nationally — heart disease, cancer, chronic respiratory disease, unintentional injury, and stroke — are higher in rural areas. Additionally, while mortality rates are decreasing nationwide, they are falling at a slower rate in rural regions. Rural residents face higher rates of cancer from modifiable risks, including human papillomavirus, tobacco, and a lack of preventive cervical cancer and colorectal screenings. Opioid overdose deaths are also 45% higher nationwide in rural regions, yet urban centers have more treatment facilities.⁶

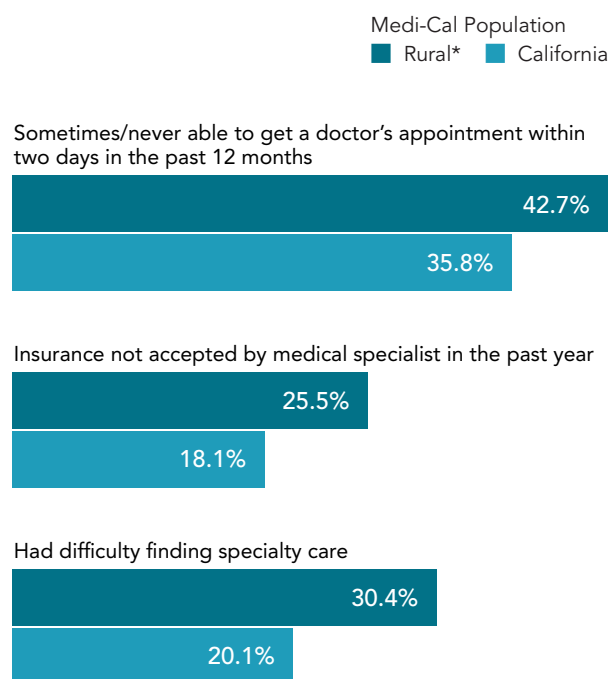
Delivering health care in these rural settings poses unique challenges. Patients must travel long distances to receive care, and access to specialty care can be especially limited. Having to travel long distances can mean taking time off from work and needing to pay for child or elder care, creating delays in or avoidance of treatment. This lack of access sometimes means that residents of rural areas present with diseases in advanced stages. Longer travel times can also lead to longer waits for emergency medical services, putting the lives of patients in danger when they need immediate treatment.⁷ In California, 25% of rural hospitals closed during the two decades prior to 2018.⁸

Physician shortages also contribute to access-to-care difficulties in rural areas. Primary care physicians in rural regions often face heavy patient loads, and access to mental health providers and other specialists can be limited.⁹ Prior studies have found large differences in the number of providers in rural versus urban areas; one study found that rural areas had only 40 primary care physicians per 100,000 people, compared

with urban areas, which had 53 physicians per 100,000 people. This discrepancy is even larger for specialists, with only 30 per 100,000 people in rural areas versus 263 per 100,000 in urban areas.¹⁰

An examination of data from the California Health Interview Survey (CHIS) indicates that rural Medi-Cal patients face more barriers to care than Medi-Cal patients statewide, particularly when attempting to access specialty care. Rural patients are more likely to face issues getting doctor's appointments, having their insurance accepted by specialists, and finding specialty care, as shown in Figure 1.

Figure 1. Difficulty Accessing Care



*Includes the following counties: Butte, Shasta, Humboldt, Del Norte, Siskiyou, Lassen, Trinity, Modoc, Plumas, Sierra, Mendocino, Tehama, Glenn, Colusa, Sutter, Yuba, Nevada, Tuolumne, Calaveras, Amador, Inyo, Mariposa, Mono, Alpine, Placer, El Dorado, Tulare, Merced, Madera, San Luis Obispo, San Benito, and Imperial.

Source: Blue Sky Consulting Group analysis of 2017 CHIS data.

These difficulties in access mean that actions on the part of MCPs such as supporting specialty care networks, making telehealth services available, or facilitating transportation to available facilities can be especially important to bridge gaps in care.

Medi-Cal Managed Care Models

Among the states, California pioneered the use of managed care for Medicaid, launching some of the first pilots to test this delivery system in the 1970s. Beginning in the 1980s with the creation of the COHS model, the state has progressively transitioned all 58 counties and most Medi-Cal populations into managed care.

The Regional model was implemented as part of Medi-Cal's expansion into the remaining, rural areas of the state in 2013. Under the Regional model, Medi-Cal enrollees can choose to enroll in one of two commercial MCPs. Enrollment in the 18 Regional model counties is mandatory for most Medi-Cal enrollees.¹¹

Methodology

This study involved two principal components. First, the study team conducted structured interviews with a range of providers, MCP representatives, county officials, and policy experts. These interviews were aimed at identifying specific strengths and weaknesses in the Regional model approach, and at surfacing suggestions for potential recommendations or improvements. Next, available data regarding patient satisfaction, health care quality, and access to care were analyzed, and the Regional model results were compared with those in other, similar counties. In addition, the study analyzed network adequacy data from DHCS and data from the California State Auditor on travel distance to the nearest provider.

Structured Interviews

The study team conducted more than two dozen structured interviews during the course of the evaluation, including interviews with the following¹²:

- ▶ Providers, including clinics and hospitals
- ▶ MCPs and independent physician associations (IPAs)
- ▶ County officials, advocates, consultants, and others

During the interviews, participants were asked to describe their interactions with the two Regional model MCPs, identify specific strengths and weaknesses of the Regional model, and provide specific examples where MCP performance could be improved. Where participants had information about Regional model and alternative models of delivering managed care, they were asked to comment on the differences.

Data Analysis

As a supplement to the structured interviews, the study team collected and analyzed available data on patient satisfaction and experience, access to care, and measures of MCP performance, including the following:

- ▶ Consumer Assessment of Healthcare Providers and Systems (CAHPS)
- ▶ CHIS
- ▶ Healthcare Effectiveness Data and Information Set (HEDIS)
- ▶ Selected DHCS Medi-Cal Managed Care Performance Dashboard measures
- ▶ Network adequacy reports — Alternative Access Standards

Comparison Groups

Because of the unique challenges of delivering health care in rural areas, two comparison groups of counties that matched the characteristics of the Regional model counties as closely as possible were developed. Specifically, Regional model counties were compared with (1) a “rural comparison” group consisting of 14 other rural counties in California and (2) the “PHC north” group, which includes seven of these rural comparison group counties that joined PHC as part of the Medi-Cal rural expansion in 2013. The rural comparison group includes some counties where Medi-Cal managed care has been in place longer and is the more important comparison group in terms of setting state policy expectations and goals. The PHC north group is more directly comparable to the Regional model counties in terms of geography and

experience with managed care, consisting of relatively remote counties that made the transition to managed care when the Regional model was established.¹³ Table 1 lists the Regional model counties and counties from both comparison groups.

Table 1. Regional Model and Comparison Group Counties

REGIONAL	PHC NORTH	RURAL COMPARISON
Alpine	Del Norte	Del Norte
Amador	Humboldt	Humboldt
Butte	Lassen	Imperial
Calaveras	Modoc	Lassen
Colusa	Shasta	Madera
El Dorado	Siskiyou	Mendocino
Glenn	Trinity	Merced
Inyo		Modoc
Mariposa		San Benito
Mono		San Luis Obispo
Nevada		Shasta
Placer		Siskiyou
Plumas		Trinity
Sierra		Tulare
Sutter		
Tehama		
Tuolumne		
Yuba		

Note: In smaller counties, MCPs report results aggregated by region. For example, PHC reports data for both HEDIS and CAHPS in four regions: northeast, northwest, southeast, and southwest. Although Lake and Napa counties met the criteria to be included in the rural comparison group, the data for these counties are aggregated with other non-rural counties in the PHC southwest region. Therefore, data for these counties were not available for analysis, and these two counties were excluded from the rural comparison group.

Source: Blue Sky Consulting Group, 2019.

Analytic Approach

In order to assess the performance of the Regional model, specific comparison metrics were identified; results from Regional model counties were compared with those from comparison group counties. In addition, data from CHIS were analyzed using a regression analysis in which key outcome measures from the survey were assessed while controlling for factors such as patient demographic characteristics.¹⁴

Findings: Stakeholder Interviews

Structured interviews with stakeholders revealed that many Regional model providers and county health officials were deeply concerned about the performance of the two Regional model MCPs. In contrast, providers in the PHC north group were largely satisfied with the way their MCP has been performing. In addition to the contrast in providers' reactions, interviews also revealed that the two Regional model MCPs acknowledged difficulties associated with the initial transition to managed care and have made efforts since that time to improve both MCP performance and communication with Regional model counties and providers.

Burdensome Processes, Procedures, and Bureaucracy

Many providers expressed frustrations with the processes, procedures, and bureaucracy associated with their interactions with the two MCPs. Interviewees indicated that the MCPs lacked a consistent, formal presence in their communities, especially during the initial transition period from fee-for-service to managed care. Some reported that there was frequent staff turnover among the MCPs' regional staff, which made it difficult to identify the appropriate person to contact. Others reported that the initial contracting process with the MCPs (and Anthem in particular) was long and burdensome, with at least one clinic reporting that it still does not have a contract in place. Several interviewees indicated that the initial rollout

of managed care in Regional model counties was not handled well by the MCPs. These interviewees reported that they received little orientation or education about managed care from the MCPs and that communication was poor.

Interviewees also expressed concern that the MCPs did not engage with or understand the region. For example, some interviewees noted that the two MCPs are headquartered and managed outside of the region and may therefore lack community input at the leadership level. This, they noted, was in contrast to PHC, which has local representation on its governing board and a chief medical officer who is a provider in the community.

Providers also noted poor communication and information sharing around their panels of patients; some indicated that patients had been assigned to their clinics who had not previously been seen at the facility or by its providers, and who were difficult to reach due to inaccurate contact information. Providers also noted that communication, education, and support around efforts to increase HEDIS scores were sporadic and inconsistent, which made the task of improving these scores difficult.

In addition to the concerns about a limited presence in the community, many interviewees expressed concern about what they described as tedious pre-authorization processes required for many procedures and frequent denials of their requests for authorization. A related concern involved slow adjudication of claims for reimbursement. Several interviewees noted that the transition to managed care required adding new staff members to handle the increased administrative requirements of seeking pre-authorization or approval. Interviewees indicated that this process was often opaque, and that obtaining what they believed was simple information, such as whether a particular medication was covered, required making a phone call and waiting on hold for an extended period. Another specific example that was mentioned involved the recently implemented transportation benefit, which covers the cost of transportation for Medi-Cal enrollees who lack

alternative means of transport. When this benefit was initially made available, several interviewees indicated that the procedures for accessing the benefit were burdensome and overly complicated or confusing such that the benefit was very difficult to access and therefore not widely used by enrollees.

One source of potential communication difficulty between providers and MCPs relates to the role of IPAs. These organizations effectively operate in between the providers and the MCPs to aid in managing care. Under this model, the IPA receives a capitated payment for each covered member and is responsible for paying for care for those members through contracts with participating providers. The IPA structure can offer a more locally based connection to providers, and therefore may be more nimble in responding to local concerns than a larger MCP would be. However, the IPA also represents an additional layer of bureaucracy or administration between the providers and the MCPs.

In the Regional model counties, California Health & Wellness generally has not used IPAs, while most care covered by Anthem is provided via the River City IPA. While interviewees generally did not explicitly indicate that problems with River City or the IPA model were root causes of their concerns or frustrations, it is nevertheless possible that this additional layer of complexity (and the difference between Anthem and CHW) was a source of confusion or contributed to difficulties in communication or in identifying the appropriate person to address a problem.

Limited Specialty Care Networks

The second important area where interviewees expressed concerns related to limited specialty care networks. Many interviewees reported that existing referral networks were disrupted by the transition to managed care. This transition (and what interviewees considered to be inadequate efforts to build networks) resulted in poor access to specialty care. Many interviewees highlighted examples where patients had to travel long distances or endure long waits in order to access specialty care. For example, one interviewee reported that there were no rheumatologists accepting patients in his region. Other interviewees reported that access to common specialties such as urology, neurology, gastroenterology, and podiatry was very limited or nonexistent in the region.

Differences in Philosophical Approaches to Providing Services

One final issue that emerged in several interviews relates to differing ideas about how Medi-Cal should be provided. Specifically, several interviewees noted that the two commercial MCPs are seeking to earn a profit through their administration of Medi-Cal benefits. These interviewees identified at least two perceived issues or deficiencies that result from this arrangement. First, some interviewees perceived the profit motive as being responsible for burdensome preapproval processes, denials of claims and authorization requests, and delays in receiving reimbursement from the MCPs. Second, several interviewees noted that PHC (a COHS that does not seek to earn a profit) had made significant community investments, such as in affordable housing or grants for clinic construction. Interviewees equated these investments to the lack of need for profits, in effect suggesting that commercial MCPs have resources that could be invested in the community rather than going to shareholders.¹⁵ Together with concerns about MCP leadership being based outside of the region (in contrast to PHC, where the MCP is locally based and providers and counties have representation on the governing board), these more philosophical objections provide important context for evaluating the other practical concerns raised by interviewees.

Other Perspectives Regarding Regional Model MCPs

In order to put the concerns of Regional model providers and counties in perspective, interviews were conducted with providers in rural counties that had direct experience with PHC, including some who also have experience with one or both Regional model MCPs. In addition, interviews were conducted with representatives of both Anthem Blue Cross and California Health & Wellness as well as other experts familiar with Medi-Cal managed care in rural Northern California. These interviews suggest a somewhat more complex and nuanced situation that defies easy characterization.

Experience with Partnership HealthPlan Has Been Positive

All of the providers interviewed that had experience with PHC as a payer, including those with direct experience of both Regional model MCPs and PHC, described the experience in positive terms. Interviewees indicated that PHC provided important training and shared important information during the transition to managed care. Some interviewees indicated that the specialty care network improved following the transition to managed care when compared with the fee-for-service provider network (reportedly as a result of higher rates paid by PHC to specialists). Interviewees also indicated that PHC had logical and reasonable requirements for pre-authorizations that were not viewed by providers as overly burdensome. Moreover, interviewees reported that exceptions to rules, such as the requirement to try a generic medication as a first-line treatment, were granted if a compelling reason could be provided. Interviewees also indicated that it was easy to contact the appropriate person at PHC regarding any issues that needed to be addressed and that communication around the rollout of new benefits, such as the transportation benefit, was timely and effective. Many interviewees stated that PHC is a “true partner” in their shared efforts to deliver care to their patients. In sum, the comments received about PHC were in stark contrast to many of the comments made about Anthem and CHW.

The positive reputation that PHC has earned appears to have paid dividends. When problems arise, providers interviewed were usually willing to give PHC the benefit of the doubt. These same issues, when they have emerged in Regional model counties, have frequently resulted in conflicts or criticisms. For example, providers in both PHC and Regional model areas described an issue in which patients were assigned to a clinic but could not be reached due to inaccurate contact information. In the case of one PHC provider, this was viewed as an inevitable outcome and one that provided an unanticipated benefit in the form of assistance with the clinic’s cash flow. That is, while capitation payments received for patients not seen at the clinic eventually had to be returned, their initial receipt helped the clinic to manage its intra-fiscal-year cash flow. In contrast, the Regional model provider that described this same situation viewed the assignment of these “unseen patients” as an avoidable MCP error, and one that caused increased administrative burden as the clinic fruitlessly attempted to contact them. Furthermore, while providers viewed the assignment of these unseen new patients as MCP mismanagement, MCP interviewees reported that this was simply part of their mandate to assign all patients to a primary care provider in their area.

A similar circumstance surrounded the transportation benefit, with providers in both PHC and Regional model areas describing difficulty in accessing the benefit. However, the PHC provider mostly viewed this difficulty as stemming from a lack of reliable transportation providers, while the Regional model providers viewed these issues as due to MCP bureaucracy or intransigence.

This goodwill that PHC has earned may help to explain at least some of the differences in attitudes among providers in the PHC and Regional model areas. Interviewees indicated that at least some of the issues identified with respect to the Regional model MCPs have been addressed, while the lack of goodwill that early problems generated may have lingered.

Some Concerns Have Been Addressed

Over time, both Regional model MCPs have reportedly responded to concerns raised by counties and providers. MCPs reported both an increased effort to make staff available and the addition of dedicated staff to support providers and counties in the region. Both MCPs also reported that they had made efforts to expand the available specialty care network, and that they were prepared to contract with “all willing providers.” In addition, both MCPs reported making investments in telehealth or other electronic means of expanding access to care as well as efforts to reduce the number of zip codes with Alternative Access Standards. In response to concerns about burdensome pre-authorization requirements, Anthem reported that, in conjunction with River City IPA, the number of procedures and services requiring pre-authorization had been significantly reduced (reportedly by 80%).

Interviewees from the MCPs also suggested that at least some of the concerns about the Regional model do not relate specifically to MCP performance, but instead to the transition from a long-established fee-for-service model to the more tightly controlled managed care model. This transition inevitably resulted in significant changes to the way care was delivered and paid for, and required changes to the ways some providers treated specific patients or conditions. Interviewees reported that these types of changes were precisely the reason DHCS has promoted the switch to managed care (i.e., to promote value-based payment methods, increase evidence-based practice, and better align provider incentives).

At least some interviewees acknowledged that some of these efforts on the part of the MCPs have been successful. While most interviewees continued to be concerned about specialty care access, some reported that the situation had improved relative to the initial period following the implementation of managed care. Others reported that the initial difficulties associated with accessing the transportation benefit had been addressed, and at least some of the initial contracting difficulties have reportedly been resolved

(although at least some providers reportedly still do not have contracts in place).

Despite MCP Improvement Efforts, Stakeholders Remain Concerned

Analysis of interviews with PHC and Regional model providers, MCPs, and others suggests a complex and nuanced picture. Circumstances in Regional model counties appear to have improved at least somewhat since the initial rollout of managed care, and both MCPs reported a willingness and desire to work with counties and providers to continue to make improvements. The MCPs have added staff to support Regional model counties; the number of procedures requiring pre-authorization has decreased at least in some cases; and efforts to address contracting issues, expand the provider network, and expand access to specialty care are ongoing. Nevertheless, many Regional model providers remain deeply concerned with the performance of the two MCPs. The initially troubled relationship between MCPs and providers, combined with the generally glowing reviews of PHC offered by providers in neighboring communities, has led some in the Regional model counties to believe that only a switch to a COHS model (and, ideally, joining PHC) will address their concerns.

Findings: Access, Quality, and Consumer Experience

An extensive data analysis comparing the results in Regional model counties with those in comparable rural counties was conducted as a companion to the structured interviews. This data analysis indicates that patient experience and quality-of-care measures are similar, particularly when comparing Regional model and PHC north counties. On the broadest measures of patient satisfaction and health care quality from HEDIS, the rural comparison group showed somewhat better results when compared with either the Regional model or PHC north. Specific results are discussed below.

Consumer Experience Was a Mixed Bag, but Mostly Worse for Enrollees of Regional Model MCPs

Patient satisfaction was measured through two separate data sources, a patient satisfaction survey and an analysis of grievance data filed with DHCS.

The Consumer Assessment of Healthcare Providers and Systems (CAHPS) is a patient satisfaction survey conducted every three years. The most recent survey covers 2016 and was published in January 2018.¹⁶ The CAHPS survey is administered to patients in all Medi-Cal MCPs and covers patient satisfaction with both their MCP and providers. Results are summarized by MCP, allowing for a comparison across managed care models when results are aggregated by MCP.

Table 2 presents a comparison of Regional model MCPs, PHC north, and the rural comparison group. The values reflect the average score of all MCPs in each region, presented as the statewide percentile score. For example, 20th percentile means that 80% of MCPs performed better.

Table 2. Consumer Experience with MCPs, by Region

	CAHPS PERCENTILE RANKING		
	REGIONAL	PHC NORTH	RURAL COMPARISON
All Health Care	20th	10th	37th
Personal Doctor	26th	18th	53rd
Specialist Seen Most Often	21st	51st	46th
Getting Needed Care	32nd	42nd	59th
Getting Care Quickly	75th	73rd	64th
How Well Doctors Communicate	49th	86th	48th
Customer Service	45th	99th	66th

Notes: CAHPS results are presented as a single value for each health plan. For smaller (generally rural) counties, results are presented for groups of counties. For example, both Anthem and CHW present the results for Regional model counties grouped into two regions. PHC presents results for counties grouped into four regions. Results presented here are the simple average, with one observation per plan/reporting unit. Results for adult and child measures were averaged to simplify presentation of the available data. Results for all measures are reported in Appendix D. Results exclude Kaiser Permanente.

Source: Blue Sky Consulting Group analysis of 2016 CAHPS data.

These results show a mixed picture. Regional model MCPs scored, on average, worse than PHC north on four of seven measures and worse than rural comparison MCPs on five of seven measures. On the broadest measure, “Rating of All Health Care,” Both the Regional model and PHC north counties earned scores well below that of the rural comparison group. Specifically, the result from the rural comparison group placed that region in the 37th percentile when compared with all MCPs statewide (i.e., 63% of MCPs scored better). In contrast, the Regional model earned a result in the 20th percentile and PHC north’s score was in the 10th percentile. Similarly, the rural comparison group outperformed both the Regional model and the PHC north group on the measures “Rating of Personal Doctor” and “Getting Needed Care.” In contrast, both the Regional model and PHC north counties outperformed the rural comparison group on the measure “Getting Care Quickly.” On the measures “Rating of Specialist Seen Most Often” and “Customer Service,” both the PHC north and rural comparison groups outperformed the Regional model.

Other Indicators of Patient Satisfaction

In addition to the CAHPS survey, two additional measures from the DHCS Medi-Cal Managed Care Performance Dashboard were examined that can help to illuminate the satisfaction of patients in Regional model counties. These measures included medical exemption requests and grievances filed.

Table 3. Selected DHCS Dashboard Data, by Region

	REGIONAL	PHC NORTH	RURAL COMPARISON
Medical exemption requests per 10,000 members	1.38	0.04	0.29
Grievances per 1,000 member months	53.6	69.3	46.6

Source: Blue Sky Consulting Group analysis of data from the DHCS Medi-Cal Managed Care Performance Dashboard, 2018.

Medical exemption requests are made by members who seek to remain in fee-for-service Medi-Cal rather than receive care from an MCP. As shown in Table 3, such requests were very rare among PHC north Medi-Cal enrollees. Somewhat more enrollees in the rural comparison group filed such requests in 2018, but by far the largest rate of medical exemption requests came from Regional model county Medi-Cal enrollees. Although this rate (1.38 requests per 10,000 members) substantially exceeded the rate for either comparison group, the rate in Regional model counties was only slightly higher than the average rate of 1.08 requests per 10,000 members across all MCPs statewide (not shown).

The data on grievances presents a somewhat different picture. While PHC north had the lowest rate of exemption requests among the three comparison groups, the rate of grievances filed against MCPs was highest for PHC north members. Grievances for Regional model MCPs were lower than for PHC north and only slightly higher than for the rural comparison group. Both the Regional model and rural comparison groups had grievance rates that were lower than the MCP average statewide, which was 56.8 grievances per 1,000 member months (not shown).

Regional Model MCP Enrollees Fare Worse on Some Measures, but Differences Are Not Statistically Significant

The California Health Interview Survey (CHIS) is a large-scale annual survey of Californians. Respondents are asked detailed questions about health conditions, health insurance, and various economic and demographic characteristics, among other topic areas. Because CHIS is a large-scale survey with detailed questions about these respondent characteristics, it is possible to identify and separately analyze the Medi-Cal population and identify the type of managed care delivery model they are enrolled in.¹⁷

CHIS includes several important questions that can be used to evaluate potential differences among Medi-Cal managed care delivery models. Table 4 presents the results of the CHIS data comparison.

Table 4. CHIS Variables - Regional Model Comparison

	REGIONAL	PHC NORTH	RURAL COMPARISON
Did not have usual source of care	12%	10%	16%
Usual source of care: ER, some other place, no usual place	20%	15%	22%
Had difficulty finding primary care	17%	16%	10%
Had difficulty finding specialty care	35%	40%	32%
Insurance not accepted by medical specialist in past year	37%	35%	27%
Sometimes/never able to get doctor's appointment within two days	38%	31%	47%

Note: Results are pooled across the years 2014–2017 in order to obtain a statistically stable result.

Source: Blue Sky Consulting Group analysis of CHIS data, 2014–2017.

This analysis does not point to clear differences among the three comparison groups. The first two measures provide an indication of whether rural county Medi-Cal enrollees have a usual place to go when sick or needing care. On both of these measures, Regional model enrollees are very slightly less likely to lack a usual source of care (12%) or to use the ER as their usual source of care (20%) when compared with Medi-Cal enrollees in the rural comparison group (16% and 22%, respectively). Members in the PHC north group were the least likely to lack a usual source of care (10%) or use the emergency room as their usual source of care (15%). Although rural comparison county enrollees were the most likely to report that they used the emergency room as their usual source of care, these same enrollees were the least likely to report that they “had difficulty finding primary care,” with only 10% reporting such difficulty as compared with 17% of Regional model enrollees and 16% of PHC north enrollees.

Results were similarly mixed for the two access-to-specialty-care measures. About a third of enrollees in all three groups reported difficulty finding specialty care. A larger share of enrollees in Regional model counties reported that their insurance was not accepted by a medical specialist in the past year (37%) when compared with respondents in the rural comparison group (27%).

In addition to the analysis of CHIS descriptive statistics, each of these CHIS measures was tested using a regression analysis. Regression allows researchers to control for demographic and other variations across populations which may account for any observed differences. Any differences in outcomes due to the managed care model can then be identified. Regression analysis results did not find any reliable, statistically significant differences in outcomes due to the MCP.¹⁸

Overall, the analysis of CHIS data suggests that Medi-Cal enrollees in Regional model counties have experiences that are substantially similar to those in comparable rural counties. Residents of rural areas are more likely to report difficulty in accessing care when compared with Medi-Cal enrollees statewide.

Quality of Care Was Also Comparable Across Groups

The Healthcare Effectiveness Data and Information Set (HEDIS) represents perhaps the most widely used data source for evaluating and comparing MCP performance. According to the Centers for Medicare & Medicaid Services (CMS), HEDIS measures can be used by MCPs “to identify opportunities for improvement, monitor the success of quality improvement initiatives, track improvement, and provide a set of measurement standards that allow comparison with other [managed care] plans.”¹⁹ The state of California uses HEDIS to measure the effectiveness of Medi-Cal MCPs, and publishes the results annually in the *Medi-Cal Managed Care External Quality Review Technical Report*.²⁰

HEDIS includes measures relating to immunization status, cancer screening, heart disease and diabetes management, emergency department utilization, and hospital readmissions. Data are available for more than two dozen separate HEDIS measures for each of California’s Medi-Cal MCPs. In order to facilitate analysis of available data, Medi-Cal MCP HEDIS measures were summarized into four categories for the purposes of this report²¹:

- ▶ **All-measures average.** This measure includes the simple average for all available measures.²²
- ▶ **Child and adolescent access to primary care.** This summary measure includes the average of the following individual measures: Childhood Immunization Status—Combination 3, Children and Adolescents’ Access to Primary Care Practitioners—12–24 Months, Children and Adolescents’ Access to Primary Care Practitioners—25 Months–6 Years, Children and Adolescents’ Access to Primary Care Practitioners—7–11 Years, Children and Adolescents’ Access to Primary Care Practitioners—12–19 Years, Immunizations for Adolescents—Combination 2, and Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life.
- ▶ **Chronic disease management.** This summary measure includes the average of the following individual measures: Annual Monitoring for Patients on Persistent Medications—ACE Inhibitors or ARBs, Annual Monitoring for Patients on Persistent Medications—Diuretics, Asthma Medication Ratio—Total, Comprehensive Diabetes Care—Blood Pressure Control (<140/90 mm Hg), Comprehensive Diabetes Care—Eye Exam (Retinal) Performed, Comprehensive Diabetes Care—HbA1c Control (<8.0%), Comprehensive Diabetes Care—HbA1c Poor Control (>9.0%), Comprehensive Diabetes Care—Hemoglobin A1c (HbA1c) Testing, Comprehensive Diabetes Care—Medical Attention for Nephropathy, and Controlling High Blood Pressure.
- ▶ **All-cause readmissions.** This measure is reported in its original form.

Table 5. Summary of HEDIS Measures, by Region, 2015–18

	ALL-MEASURES AVERAGE	CHILD AND ADOLESCENT ACCESS TO PRIMARY CARE	CHRONIC DISEASE MANAGEMENT	ALL-CAUSE READMISSIONS
Regional	66%	75%	67%	15%
PHC north	66%	73%	67%	13%
Rural comparison	71%	78%	70%	14%

Source: Blue Sky Consulting Group analysis of HEDIS data from Department of Health Care Services, *Medi-Cal Managed Care Quality Improvement Reports: External Quality Review Technical Reports with Plan-Specific Evaluation Reports* (July 1, 2016–June 30, 2017 and July 1, 2017–June 30, 2018), www.dhcs.ca.gov. Results reflect the unweighted MCP average score. Results exclude Kaiser Permanente.

Table 5 presents the results of a comparison of HEDIS scores for Regional model and comparison group counties. As shown in Table 5, Regional model MCPs demonstrate performance that is substantially similar to that of the PHC north group; performance of the rural comparison group was somewhat better across all measures.

An examination of average HEDIS scores over time (Table 6) also finds that performance in Regional model counties was very similar to that of the PHC north group; however, the rural comparison group counties demonstrated somewhat higher HEDIS scores across each of the years examined.

Scores improved slightly for all three comparison groups between 2015 and 2018, although the increase was largest in Regional model counties. The average HEDIS score in Regional model counties improved from 64% in 2015 to 68% in 2018. Other counties in the rural comparison group saw a smaller improvement, from 70% in 2015 to 71% in 2018. Finally, average HEDIS scores improved in the PHC north group from 65% in 2015 to 67% in 2018.

Overall, an examination of HEDIS scores shows that the results are substantially similar in Regional model counties as compared with other comparable parts of the state, particularly in the most recent, 2018 period.²³ The comparison group of rural counties did outperform both the Regional model counties and the PHC north group, both of which implemented managed care relatively recently.

Table 6. Average HEDIS Score, by Region, 2015–18

	2015	2016	2017	2018
Regional	64%	67%	67%	68%
PHC north	65%	67%	66%	67%
Rural comparison	70%	71%	70%	71%

Notes: Results reflect the unweighted MCP average score. Results exclude Kaiser Permanente.

Source: Blue Sky Consulting Group analysis of HEDIS data from Department of Health Care Services, *Medi-Cal Managed Care Quality Improvement Reports: External Quality Review Technical Reports with Plan-Specific Evaluation Reports* (July 1, 2016–June 30, 2017 and July 1, 2017–June 30, 2018), www.dhcs.ca.gov.

Some Regional Model Enrollees Need to Travel Long Distances to the Nearest In-Network Provider

DHCS requires (pursuant to federal requirements set forth by CMS) Medi-Cal MCPs to meet specific access standards. The standards measure both the distance and the time required to travel to specific types of providers, including adult and pediatric primary and specialty care, hospitals, outpatient mental health, obstetrics/gynecology, and pharmacies.

According to the most recent *Compliance Assurance Report* from DHCS, all MCPs, including those in Regional model and comparison group counties, are “in full compliance with the Annual Network Certification requirements set forth in 42 C.F.R. section 438.207 or [are] passing with conditions.”²⁴ In cases where MCPs are not able to meet a specific standard, however, they can request an Alternative Access

Standard, which allows for longer travel times in cases where MCPs indicate that the original standard cannot be met. Table 7 presents the most recent data on the percentage of zip codes affected by an Alternative Access Standard in Regional model, PHC north, and rural comparison counties.

Table 7. Percentage of Regions with Alternative Access Standards, by Area of Specialty

	REGIONAL	PHC NORTH	RURAL COMPARISON
Pediatric	28%	27%	53%
Adult	27%	27%	24%
Hospital	14%	30%	31%
Mental health (non-psychiatry) outpatient services	1%	0%	0%
Ob/gyn	1%	0%	0%
Pharmacy	11%	0%	2%
Ob/gyn PCP	69%	0%	7%

Source: Blue Sky Consulting Group analysis of data from Department of Health Care Services, 2019 Approved Alternative Access Standards Report, as of January 30, 2019, www.dhcs.ca.gov (PDF).

As shown in Table 7, Regional model counties required Alternative Access Standards for more service categories when compared with either the PHC north or rural comparison groups, although the percentage of zip codes requiring an Alternative Access Standard was very similar in several cases. All three regions required an Alternative Access Standard for at least some zip codes for pediatric, adult, and hospital care. However, in the Regional model, more zip codes had an Alternative Access Standard for pharmacy and obstetrics/gynecology primary care provider (ob/gyn PCP) in relation to both comparison groups.

Although there were more service categories in the Regional model with an Alternative Access Standard, there were some categories where the frequency of Alternative Access Standard zip codes was lower. For example, nearly twice as many zip codes in the rural comparison group (53%) were affected by an Alternative Access Standard for pediatric care

compared with the Regional model (28%) or the PHC north group (27%). For hospital care, just 14% of Regional model zip codes were affected by an Alternative Access Standard, about half the level in the rural comparison or PHC north groups.

The California State Auditor also examined access to care using the network adequacy data, concluding that “Regional Model health plans have required some beneficiaries to travel excessive distances to obtain medical care from providers.”²⁵ The State Auditor also found that, while both Regional model MCPs cover the same counties, enrollees may face very different travel distances depending on which plan they are enrolled in. For example, the State Auditor reported that some Anthem enrollees needed to travel as far as 239 miles to see a cardiologist, while the maximum distance for CHW enrollees was 115 miles. Conversely, some CHW enrollees needed to travel as far as 85 miles to see a primary care provider, while the maximum distance for Anthem enrollees was just 10 miles.²⁶

There can be many reasons for an Alternative Access Standard, including geographic obstacles to care (i.e., rural areas are difficult to serve). Nevertheless, while the need for an Alternative Access Standard does not in itself demonstrate diminished access to care, a larger fraction of Alternative Access Standard zip codes in a particular region does suggest poorer access to care.

Data Analysis Conclusions

Patients in rural areas can face important challenges in accessing health care (Figure 1). In comparing differences among rural areas, the analysis presented in this report suggests wide variation, depending on the region and measure used. The following are the important findings from this data analysis:

- ▶ On the broadest measures of patient satisfaction from the CAHPS survey and health care quality as measured by HEDIS, results were poorer in the Regional model and PHC north counties when measured against the results in a comparison group of rural counties.

- ▶ While HEDIS scores were generally lower in Regional model counties when compared with the rural comparison group, scores increased more rapidly in Regional model counties over the 2015–2018 period.
- ▶ Using administrative data to examine patient satisfaction showed that Regional model Medi-Cal enrollees had more medical exemption requests than those in either comparison group, but fewer grievances than those in the PHC north group (grievance rates were similar for Regional model and rural comparison group counties).
- ▶ Access to care remains an important challenge for rural Medi-Cal enrollees across the state. However, available data on access to care presents a mixed picture when comparing performance across rural groups. For example, analysis of one survey measure, “Getting Care Quickly,” showed that both Regional model and PHC north MCPs received scores near the 75th percentile statewide (meaning they outperformed three-quarters of the MCPs); rural comparison group MCPs earned an average score at the 64th percentile. An examination of CHIS access-to-care data found that Regional model enrollees reported somewhat more difficulty finding specialty care relative to enrollees in the rural comparison group, but were less likely to report not having a usual source of care.

In general, data analysis suggests that Regional model MCP performance could be improved, at least in some areas, when compared with other, comparable rural counties. Available data are limited, however, and may not be the most appropriate tool for measuring important provider concerns such as difficulty accessing benefits, lack of adequate specialty networks, limited presence in the community, or difficulty obtaining reimbursement. These concerns remain an important aspect of health care delivery in rural California, and challenges in delivering care remain in rural areas throughout the state.

Discussion

Available data show that — at least according to some measures — opportunities exist to improve patient satisfaction, access to care, and other outcomes in Regional model counties when compared with other rural counties in California, although important differences in individual measures exist. Moreover, providers in Regional model counties were more likely to report serious frustrations with and concerns about the two Regional model MCPs, Anthem Blue Cross and California Health & Wellness. Higher levels of provider dissatisfaction, if not addressed, may lead to poorer patient outcomes in the future.²⁷ In addition, provider concerns have led some in Regional model counties to seek an alternative Medi-Cal managed care delivery model. Specifically, several interviewees indicated a desire to join with Partnership HealthPlan, form a regional COHS, or develop another alternative to the current Regional model arrangement with two commercial MCPs. The depth and extent of these provider concerns, therefore, suggest that changes or improvements to the current system should be considered.

Further Research

Although important provider concerns were identified, this identification was based on structured interviews with a selected group of providers. In order to more systematically identify the breadth of these provider concerns, establish whether they are different from provider concerns in other comparable counties, and determine whether they have persisted over time, further research would be required. The most suitable vehicle for this research would be a survey of providers in both Regional model and comparison group counties. Such an analysis of provider satisfaction can supplement a continued monitoring of patient satisfaction and outcome data, and determine if poor provider satisfaction (if confirmed) is translating into poorer outcomes for patients.

In addition, while this study has sought to incorporate all available, relevant data sources, the analysis presented nevertheless is subject to important limitations. Most important, very limited data on access to

specialty care exist. HEDIS largely addresses quality measures subject to primary care intervention and, to a more limited extent, hospitalization. In general, however, these data do not address access to specialty care. DHCS network adequacy standards are intended to ensure that an adequate network is available; however, the available data do not directly allow for an analysis of whether such a network is in fact available to most enrollees. The survey data sources (CHIS and CAHPS) do more specifically address access to care, but these data are not a complete substitute for clinical or administrative data measuring access to care directly.

Considerations for Improvement

Given the numerous and vociferous provider and county concerns, combined with the fact that no model change is likely before the current contract expires in 2023,²⁸ state policymakers and program officials should consider a variety of approaches to improving the current model's performance. Changing the Regional model to another managed care model (e.g., COHS or Two-Plan model with a Local Initiative) could also be considered; considerations associated with this approach are discussed in Appendix C.

During the course of the interviews, the following suggestions for improvement emerged. The two MCPs could devote resources to these improvements, and DHCS could use its regulatory power to enable and enforce them.

Develop a regional recruitment strategy for improving access to care. Numerous interviewees highlighted the difficulties associated with accessing care due to provider shortages, most importantly for specialty care. While the MCPs are responsible for ensuring adequate networks, there is no explicit requirement for MCPs to recruit new providers to the region, and neither of the two Regional model MCPs makes significant investments in provider recruitment (although PHC does make such investments). Because all MCPs in the region (including commercial and Medicare MCPs) would potentially benefit from recruiting additional providers, it makes sense

for multiple MCPs to share the costs associated with recruiting and retaining providers. A regional pool or fund dedicated to provider recruitment could help to lower the cost (for any individual MCP), while simultaneously increasing the total available resources for this purpose. These resources could be supplemented with state resources, potentially from Proposition 56. In addition, developing a more general mechanism for the two MCPs to address issues of mutual concern could be beneficial in terms of improving performance and responding to provider concerns. Leadership from state officials is likely to be needed to help MCPs develop a shared regional strategy and overcome strong incentives to differentiate themselves from competitors.

Increase use of telehealth and other electronic mechanisms for accessing care. Because of the large distances that many patients must travel and the relative lack of providers in the region, tools such as telehealth have the potential to make an important difference in access to care. MCPs are already making investments in telehealth and other similar tools to increase access to care. However, additional investments in telehealth (including the development of mechanisms that allow individual clinics to finance and receive reimbursement for services) have the potential to dramatically improve access to care.

Improve communication between MCPs, providers, and counties. One of the most important concerns raised by providers was the difficulty associated with communicating with large commercial Medi-Cal MCPs headquartered outside of the region. Both commercial MCPs do have dedicated staff assigned to interfacing with providers and counties, and the MCPs report that the level of investment in such staffing has increased since the initial implementation of managed care in the region. Nevertheless, effective communication remains an important goal, and increased investment in MCP staffing for purposes of ensuring effective two-way communication, providing provider education about MCP features or changes, and other matters remains an important goal. Scheduling more regular contact or meetings between MCPs and providers could help to improve communication. In addition,

providers and counties might see an improvement in the responsiveness of the MCPs if they identify common concerns that span multiple clinics or counties and present these issues to MCPs as a group rather than on an ad hoc or individual basis.

Involve a neutral third party or DHCS in discussions regarding unresolved contracting issues. Although many of the contracting issues that characterized the initial rollout of managed care have been addressed, interviews identified a handful of cases in which individual clinics or hospitals do not have contracts with one of the MCPs. These negotiations appear to have reached a stalemate, suggesting that involvement of a neutral facilitator, mediator, or other third party might be a fruitful step toward resolving these outstanding issues.

Develop and enforce more meaningful network adequacy standards. Network adequacy standards could be designed to require MCPs to monitor and incentivize service delivery to Medi-Cal enrollees by providers in the network rather than a “head count” of providers as currently measured. This could necessitate higher rates or additional incentives paid to providers to increase the share of their practice serving Medi-Cal enrollees.

Require MCPs and their delegates to deploy a valid, reliable, and standardized provider satisfaction survey annually. DHCS could incorporate this survey into its Medi-Cal Managed Care Quality Strategy. The survey goals would be developed with the input of MCPs, providers, advocates, and other stakeholders. DHCS could incorporate the results from an annual survey into its Quality Improvement Reports and included them on the Medi-Cal Managed Care Performance Dashboard.

The rural expansion of Medi-Cal, particularly in the 18 counties that are part of the Regional model, brought with it a dislocation of established provider networks and business arrangements, which has resulted in important concerns on the part of many local providers and county officials. An investigation of available data suggests that the state’s rural areas do face numerous challenges in delivering care to patients, although many of these difficulties extend beyond the Regional model counties. Opportunities for improvement exist, however, such as developing cooperative mechanisms for recruiting providers and addressing issues of mutual concern to rural MCPs. In developing its procedures for the Medi-Cal procurement, DHCS should pursue an array of approaches to accelerate improvements in access to and quality of care in the state’s rural areas.

Appendix A. Structured Interview Participants

T. Abraham, Regional Vice President, Hospital Council Northern and Central California

Sean Atha, Senior Vice President, Business & Network Development, River City Medical Group

Doreen Bradshaw, Executive Director, Health Alliance of Northern California

Lynn Dorroh, CEO, Hill Country Community Clinic

Kimberli Frantz, MD, President, Red Oaks Medical Group, Lassen Medical Clinic

Beatrice Garcia, Imperial County Rural Legal Assistance

Dean Germano, Shasta Community Health Center

Michelle Gibbons, County Health Executives Association

Joel Grey, Anthem Blue Cross

Robin Hodgkin, Imperial County Public Health Officer

Dave Jones, CEO, Mountain Valleys Health Centers

Barsam Kasravi, Anthem Blue Cross

Lee Kemper, Former Executive Director, County Medical Services Program

Valerie Lucero, Tehama County

Meaghan McCamman, California Primary Care Association

Scott McFarland, CPCA Board and Western Sierra

Andy Miller, MD, Health Officer, Butte County

Jane Ogle, Consultant and Former Deputy Director for Healthcare Delivery Systems, Department of Health Care Services

Robert Oldham, MD, Public Health Officer and Public Health Director, Placer County

Paul Pakuckas, Anthem Blue Cross

Alicia Pimentel, Anthem Blue Cross

Tim Reilly, Pacific Health Consulting

Liza Thatranon, Staff Attorney, LSNC Health Program

Abbie Totten, California Health & Wellness

Dick Wickenheiser, MD, Public Health Officer, Tehama County

Mike Wiltermood, CEO, Enloe Regional Medical Center, Chico, Butte County

Bobbie Wunsch, Founder and Partner, Pacific Health Consulting

Appendix B. Regression Analysis Methodology and Results

Regression analyses using patient-level data from the California Health Interview Survey (CHIS) were conducted to assess whether the managed care model was correlated with specific measures of access to care. The CHIS survey is a random-dial telephone survey conducted by the UCLA Center for Health Policy Research in collaboration with the California Department of Public Health and the Department of Health Care Services, and includes over 20,000 Californians each year across all 58 counties. The survey includes adults, teens, and children, and it collects detailed demographic information from the respondents, such as age, gender, and level of educational attainment. The survey also asks questions on a variety of health-related topics, such as health insurance coverage and access to health-related services. The data used in the regressions included annual survey responses for the years 2014 through 2017.

Several models were developed comparing members of the Regional model MCPs against members of Medi-Cal MCPs in both the PHC north and rural comparison groups. Specifically, models were developed to test whether these MCP members differed with regard to their responses for the following survey questions:

- ▶ Member had a usual place to go to receive health care when feeling sick or needing health advice
- ▶ Member had used the ER in the past 12 months for any reason
- ▶ Member had a preventive care visit in the past 12 months
- ▶ Member had difficulty getting a doctor's appointment within two days (if needed)
- ▶ Member had difficulty finding a primary care provider
- ▶ Member had difficulty finding a specialty care provider (if needed)
- ▶ Member had difficulty understanding his or her doctor

Note that these responses are all binary, or yes/no answers to the survey question. Because of this, it was necessary to use a specialized form of regression called a logistic (or logit) regression, where the dependent variable is categorical rather than continuous. Using these responses as dependent variables, logistic models were developed that included a dummy variable to indicate whether the member belonged to a Regional model MCP (based on respondent's county of residence). A variety of other explanatory variables were also tested, including demographic variables such as the member's age, gender, race, income, and level of educational attainment, in addition to variables to capture whether the member was married or had a partner, was a native English speaker or had a high level of English proficiency, worked full-time, was clinically obese, or was a smoker. Other variables included whether the member had diabetes, asthma, high blood pressure, heart disease, or psychological distress in the past year or needed help for emotional or mental issues or alcohol or drug problems. Finally, dummy variables for the year of the survey were also included.

Testing of numerous specifications using various combinations of these explanatory variables revealed no statistically significant difference in outcomes based on the respondent's Medi-Cal managed care model (i.e., Regional model versus PHC north or rural comparison group). An example of one specification is presented in Table B1 (see page 22).

Table B1 presents numerous statistics from the logistic regression. The coefficient estimate is calculated using maximum likelihood estimation, or MLE. The odds ratio is the exponential of the coefficient estimate and can be used to compare the relative importance of the explanatory variables. The "Pct Increase in Odds" is the transformation of the logit coefficient using the formula $100(e^b - 1)$, where b is the logit coefficient, and expresses the result as a percentage. Therefore, if this value is x , one may say, "Each additional unit of the explanatory variable results in an increase of about $x\%$ in the odds of the dependent event occurring."

Table B1. Sample Regression Results

- ▶ Dependent variable: 1 if member had visited an ER in the past 12 months, otherwise 0
- ▶ Number of observations: 3,843
- ▶ Number of observations where dependent variable is 1: 1,304
- ▶ Pseudo R-square: 0.10081
- ▶ Max rescaled R-square: 0.14083

	COEFFICIENT	ODDS RATIO	PERCENT CHANGE IN ODDS	WALD PROB>CHI SQ
Intercept	(2.2737)			0.0000 [†]
Regional Plan Member	0.2350	1.2649	26.4885	0.2029
Year: 2015	(0.0053)	0.9947	(0.5262)	0.9821
Year: 2016	(0.0350)	0.9656	(3.4355)	0.8857
Year: 2017	0.0849	1.0886	8.8600	0.7500
Age	0.0126	1.0127	1.2696	0.0668*
Gender: Male	(0.0107)	0.9894	(1.0647)	0.9549
Race: White	0.1118	1.1183	11.8283	0.5479
Diabetes	0.1178	1.1250	12.5026	0.6474
Asthma	0.5935	1.8103	81.0332	0.0069 [†]
High Blood Pressure	0.4517	1.5710	57.1011	0.0428 [†]
Emotional or Drug Problem	0.6916	1.9969	99.6906	0.0010 [†]
Married or Has Partner	(0.1790)	0.8361	(16.3879)	0.3507
English Speaker (Well/Very Well)	0.6941	2.0019	100.1912	0.0263 [†]
Education of BA or Higher	(0.6367)	0.5290	(47.0960)	0.0272 [†]
Works Full Time	(0.0947)	0.9096	(9.0375)	0.6614

*Indicates significance at the 90% level.

[†]Indicates statistical significance at the 95% level.

Source: Blue Sky Consulting Group Analysis of California Health Interview Survey data, 2019.

Finally, the “Wald Prob > Chi Sq” value represents 1 minus the confidence level at which the hypothesis that the coefficient value equals zero cannot be rejected — that is, the data do not indicate whether the characteristic makes it more or less likely that the event represented by the dependent variable will occur. Thus, a value of 0.05 indicates that the coefficient estimate is statistically significant at the 95% confidence level.

In this model, the dependent variable was assigned a 1 if the member’s survey response indicated he or she had visited the emergency room in the prior 12 months. The CHIS data had 3,843 responses from Medi-Cal members in counties with Regional model MCPs or in similar rural counties, and 1,304 (34%) of

those respondents said they had visited the ER. Of the explanatory variables tested, the only significant explanatory variables were age, whether the member had asthma or high blood pressure, whether the member had an emotional or drug problem, English proficiency, and whether the member had a bachelor’s degree or higher. For example, those members who had a BA or higher were 47% less likely to respond that they had visited an ER in the past 12 months. As the results also show, members with asthma were on average 81% more likely to have visited the ER, and those with high blood pressure were 57% more likely. The variable denoting whether the respondent was a member of a Regional model MCP (“Regional Plan Member”), however, was not statistically significant.

Appendix C. Pursuing a Change in Managed Care Models

Provider frustration and concerns with the current Regional model have led some to express an interest in leaving the Regional model and joining Partnership HealthPlan of California (PHC) or forming their own County Organized Health System (COHS). While switching to a COHS model is one possibility, the Regional model counties could also switch to a traditional Two-Plan model, with one commercial MCP and a regional Local Initiative (LI). To date, no county has changed from one managed care model to another. In general, county leadership (e.g., board of supervisors, county public health and hospitals, providers) has considerable influence over the type of managed care model in their county or region. Other stakeholders in model choice would include the executive branch (California Health and Human Services Agency and DHCS) and MCPs themselves. Before a change in the model could proceed, careful consideration would need to be given to a number of issues and obstacles. Perhaps most importantly, given the lack of quantitative data suggesting systematic differences in outcomes between Regional model and comparison group counties, a stronger case would need to be made that a change is warranted. This would potentially require additional data collection and development of new measures or data sources beyond those available currently. In addition, several additional practical limitations to a model change exist, as discussed below.

Considerations for Partnership HealthPlan Expansion

Historically, the state has followed local preference when determining which model operates in a county. Moving the Regional model to a COHS structure therefore would likely require support from the various boards of supervisors and regional providers before DHCS would embark on such a change. Furthermore, the limitations in federal statute regarding the COHS model would need to be evaluated to determine whether sufficient room exists under the 16% enrollment cap to allow a COHS to enroll the Regional model population. Based on current (November 2018) enrollment data, it appears that adding the Regional

model population to the existing COHS population would exceed the 16% limit on total enrollment in the COHS model.²⁹

Assuming the enrollment requirement in federal statute can be met, an expansion of Partnership HealthPlan's service area would require federal approval by the Centers for Medicare & Medicaid Services (CMS). PHC also would need to assess whether expansion is viable. While the MCP already operates in many areas of rural Northern California, adding approximately 300,000 members could require significant investments in staff, information technology (IT), and other operational infrastructure. Before proceeding, the MCP would need to understand how DHCS would set the capitation rates for the Regional model members and evaluate the financial impacts of expansion.

Considerations for Creating a New COHS or LI

If PHC did not expand into the Regional model counties, the counties could explore creation of a regional governing entity to operate a new COHS. While federal statute allows for seven COHSs in California, the remaining COHS is designated for Merced County, necessitating a change in federal statute to allow another county (or group of counties) to operate the new COHS. Similar to an expansion of Partnership HealthPlan's service area, creating a new COHS would likely require changes to state statute and CMS approval of the change in the managed care model. The Regional model counties also would need to evaluate the costs of establishing a COHS. If the decision were made to proceed, implementation would still take several years (e.g., one to two years to obtain the necessary change in federal statute and an additional one to two years to launch the new COHS).

Alternatively, state and local stakeholders could consider moving to a traditional Two-Plan model structure, with one LI and one commercial MCP offering coverage to Regional model enrollees. This would require multiple counties to work together to create a regional LI through a Joint Powers Authority (JPA) or regional

health authority that would manage the LI on behalf of all the counties. These would be similar to the governance structures used by CalViva Health and Inland Empire Health Plan.³⁰

If the regional counties chose not to operate the LI, they could contract with an MCP. For example, Stanislaus County's LI contracts with the Health Plan of San Joaquin, and Health Net serves as the commercial MCP. Under this approach, it is possible PHC could serve as the Local Initiative, although this would require significant operational changes at the MCP, which may not be economically feasible. In addition, as state licensure is required for all Two-Plan model MCPs, PHC would need to complete the licensure process for each of the counties, further adding to the complexity and costs of serving as the regional counties' LI.

While significant obstacles to establishment of a new COHS or LI exist, either approach would provide for local control by the counties. Implementation of the Two-Plan model also would maintain beneficiary choice, which may be important to local stakeholders.

Appendix D. Additional Measures

Table D1. Average HEDIS Score, by Category and Region, 2015–18

	REGIONAL	RURAL COMPARISON	PHC NORTH
Childhood Immunization Status — Combination 3	62%	67%	57%
Children and Adolescents' Access to Primary Care Practitioners — 12–24 Months	94%	95%	94%
Children and Adolescents' Access to Primary Care Practitioners — 25 Months–6 Years	85%	87%	84%
Children and Adolescents' Access to Primary Care Practitioners — 7–11 Years	87%	88%	83%
Children and Adolescents' Access to Primary Care Practitioners — 12–19 Years	86%	87%	84%
Immunizations for Adolescents — Combination 2	23%	31%	18%
Weight Assessment and Counseling for Nutrition and Physical Activity for Children and Adolescents — Nutrition Counseling — Total	53%	70%	59%
Weight Assessment and Counseling for Nutrition and Physical Activity for Children and Adolescents — Physical Activity Counseling — Total	47%	61%	52%
Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life	64%	74%	64%
Breast Cancer Screening	48%	55%	49%
Cervical Cancer Screening	49%	56%	49%
Prenatal and Postpartum Care — Postpartum Care	65%	60%	57%
Prenatal and Postpartum Care — Timeliness of Prenatal Care	82%	82%	80%
Annual Monitoring for Patients on Persistent Medications — ACE Inhibitors or ARBs	83%	86%	82%
Annual Monitoring for Patients on Persistent Medications — Diuretics	84%	86%	84%
Asthma Medication Ratio — Total	58%	64%	51%
Comprehensive Diabetes Care — Blood Pressure Control (<140/90 mm Hg)	66%	65%	63%
Comprehensive Diabetes Care — Eye Exam (Retinal) Performed	46%	55%	45%
Comprehensive Diabetes Care — HbA1c Control (<8.0%)	48%	48%	50%
Comprehensive Diabetes Care — HbA1c Poor Control (>9.0%)	41%	43%	39%
Comprehensive Diabetes Care — Hemoglobin A1c (HbA1c) Testing	84%	86%	88%
Comprehensive Diabetes Care — Medical Attention for Nephropathy	84%	87%	86%
Controlling High Blood Pressure	58%	59%	56%
All-Cause Readmissions	15%	13%	13%
Ambulatory Care — Emergency Department (ED) Visits per 1,000 Member Months	52.77	50.81	58.02
Ambulatory Care — Outpatient Visits per 1,000 Member Months	283.44	302.46	232.45
Avoidance of Antibiotic Treatment in Adults With Acute Bronchitis	24%	27%	32%
Screening for Clinical Depression and Follow-Up Plan — Performance Rate	0%	8%	0%
Screening for Clinical Depression and Follow-Up Plan — Reporting Rate	5%	2%	0%
Use of Imaging Studies for Low Back Pain	74%	75%	81%

Source: Blue Sky Consulting Group analysis of HEDIS data from Department of Health Care Services, *Medi-Cal Managed Care Quality Improvement Reports: External Quality Review Technical Reports with Plan-Specific Evaluation Reports* (July 1, 2016–June 30, 2017 and July 1, 2017–June 30, 2018), www.dhcs.ca.gov. Results reflect the unweighted MCP average score. Results exclude Kaiser Permanente.

Table D2. CAHPS Measures Comparison, by Region

	REGIONAL		RURAL COMPARISON		PHC NORTH	
	ADULTS	CHILDREN	ADULTS	CHILDREN	ADULTS	CHILDREN
Rating of All Health Care	2.1	2.4	2.3	2.4	2.1	2.2
Rating of Personal Doctor	2.4	2.6	2.5	2.6	2.4	2.5
Rating of Specialist Seen Most Often	2.4	2.6	2.5	2.6	2.4	2.8
Getting Needed Care	2.1	2.3	2.2	2.3	2.2	2.2
Getting Care Quickly	2.2	2.4	2.2	2.4	2.3	2.4
How Well Doctors Communicate	2.5	2.6	2.5	2.6	2.6	2.7
Customer Service	2.5	2.4	2.5	2.4	2.7	2.5

Source: Blue Sky Consulting Group analysis of 2016 CAHPS data.

Appendix E. Calculation of Average CAHPS and HEDIS Measures

CAHPS results are presented using a “three-point mean” calculation. Survey respondents are asked to provide a rating on a scale of 1 to 10. These responses are then rescaled as follows: response values of 9 and 10 were given a score of 3; response values of 7 and 8 were given a score of 2; and response values of 0 through 6 were given a score of 1. These three-point scores are then averaged to create the three-point mean result reported in *2016 CAHPS Medicaid Managed Care Survey Summary Report* and presented here.

Unweighted average CAHPS and HEDIS scores were then calculated across MCPs for each regional comparison group.

Endnotes

1. Department of Health Care Services, *Medi-Cal Managed Care Request for Proposal (RFP) Schedule by Model Type*, updated March 11, 2019, www.dhcs.ca.gov.pdf. Note that re-procurement of managed care services in Regional model counties likely could not take place until current contracts expire in 2023.
2. Elaine M. Howle, *Department of Health Care Services: It Has Not Ensured That Medi-Cal Beneficiaries in Some Rural Counties Have Reasonable Access to Care*, California State Auditor, August 2019, www.auditor.ca.gov (PDF).
3. Howle, Department of Health Care Services, 16.
4. See, for example, Maria Panagioti, Keith Geraghty, Judith Johnson, et al., "Association Between Physician Burnout and Patient Safety, Professionalism, and Patient Satisfaction," *JAMA Internal Medicine* 178, no. 10 (October 2018): 1317–1330.
5. DHCS, *Medi-Cal Managed Care Request for Proposal (RFP) Schedule by Model Type*.
6. Robin Warshaw, "Health Disparities Affect Millions in Rural U.S. Communities," *AAMCNews*, October 31, 2017, news.aamc.org.
7. Warshaw, "Health Disparities Affect Millions in Rural U.S. Communities."
8. Xenia Shih Bion, *A Long Road to Care for Rural Californians: Stories That Caught Our Attention*, California Health Care Foundation, June 8, 2018, www.chcf.org.
9. Warshaw, "Health Disparities Affect Millions in Rural U.S. Communities."
10. National Rural Health Association, *About Rural Health Care*, accessed September 18, 2019, www.ruralhealthweb.org.
11. A list of the Regional model counties is provided in Table 1 on page 7.
12. A complete list of interviewees is provided in Appendix A.
13. Several of the data sources analyzed for Partnership HealthPlan of California (PHC), including CAHPS and HEDIS, are only available as regional reports with aggregated data across a group of counties. Specifically, PHC data are aggregated into four regions: northeast, northwest, southeast, and southwest. Because several of the counties in the two southern regions are more urbanized than the rural Northern California counties included in the Regional model, the two northern PHC regions were selected as the most directly comparable to the Regional model counties. The counties in the northern PHC regions ("PHC north") include Del Norte, Humboldt, Lassen, Modoc, Shasta, Siskiyou, and Trinity.
14. Additional details of the data analysis approach and regression results are presented in Appendix B.
15. Interviewees from the commercial MCPs commented that, while they do earn a profit, they also believe that their large size allows for economies of scale, which lower costs. In addition, effective July 1, 2019, a Medical Loss Ratio (MLR) requirement will take effect, requiring Medi-Cal MCPs to spend a minimum of 85% of revenue on patient care expenses (thereby limiting profits and administrative expenses).
16. California Department of Health Care Services, Managed Care Quality and Monitoring Division, *2016 CAHPS Medicaid Managed Care Survey Summary Report*, January 2018, www.dhcs.ca.gov.
17. Managed care model was identified based on reported county of residence.
18. Detailed regression results are presented in Appendix B.
19. Centers for Medicare & Medicaid Services, Healthcare Effectiveness Data and Information Set (HEDIS), last modified July 6, 2017, www.cms.gov.
20. For the latest report, see California Department of Health Care Services, Managed Care Quality and Monitoring Division, *Medi-Cal Managed Care External Quality Review Technical Report* (July 1, 2017–June 30, 2018), April 2019, www.dhcs.ca.gov (PDF).
21. Data on all available HEDIS measures are presented in Appendix D.
22. For measures where a lower score is better (e.g., hospital readmissions), the score was rescaled to make it comparable with the other measures by subtracting the reported value from 1.
23. Note that differences in HEDIS scores can be caused by any number of factors, only some of which are related to health plan performance or the structure of the managed care delivery model. In fact, differences due to patient characteristics, geography, the provider network, and other factors may all have larger impact on HEDIS scores.
24. Department of Health Care Services, *Compliance Assurance Report: 2018 Annual Network Certification*, accessed May 28, 2019, www.dhcs.ca.gov (PDF).
25. Howle, Department of Health Care Services, 15.
26. Howle, Department of Health Care Services, 16.
27. See, for example, Lotte N. Dyrbye, Tait D. Shanafelt, Christine A. Sinsky, et al., *Burnout Among Health Care Professionals: A Call to Explore and Address This Underrecognized Threat to Safe, High-Quality Care*, National Academy of Medicine, July 5, 2017, nam.edu.
28. In *Blue Cross of California v. Maxwell-Jolly* (December 2013), a settlement agreement over Medi-Cal rates extends the Anthem contract with the Department of Health Care Services in the Regional model counties until October 31, 2023.

29. As of November 2018, total Medi-Cal enrollment was 12,995,647 enrollees, with 1,837,938 enrollees enrolled in COHS plans (excluding enrollment in Health Plan of San Mateo and CenCal Health per federal law). If the 294,850 enrollees enrolled in the Regional model were transitioned into the COHS model, total COHS enrollment (excluding Health Plan of San Mateo and CenCal Health) would equal 16.4% of the total Medi-Cal population.
30. Fresno, Kings, and Madera Counties created a regional health authority to manage their LI, CalViva Health. Riverside and San Bernardino Counties created a JPA to operate their LI, Inland Empire Health Plan.



Department of Health Care Services

It Has Not Ensured That Medi-Cal Beneficiaries
in Some Rural Counties Have Reasonable
Access to Care

August 2019

REPORT 2018-122





CALIFORNIA STATE AUDITOR

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August 6, 2019
2018-122

The Governor of California
President pro Tempore of the Senate
Speaker of the Assembly
State Capitol
Sacramento, California 95814

Dear Governor and Legislative Leaders:

As directed by the Joint Legislative Audit Committee, the California State Auditor performed an audit of the oversight by the Department of Health Care Services (DHCS) of the *Regional Model*, a form of administering managed care to beneficiaries of the California Medical Assistance Program (Medi-Cal) in 18 counties.

This report concludes that DHCS has not ensured that some Medi-Cal beneficiaries in the Regional Model received an acceptable level of care, which we define as adequate access to care combined with adequate quality of care. Specifically, DHCS did not enforce state requirements that limit the distances health plans may direct their Medi-Cal beneficiaries to travel to receive health care. By approving health plans' requests for exceptions to the requirements without validating the reasonableness of those requests, DHCS allowed the health plans to require some of the Regional Model beneficiaries to travel excessive distances to receive care. DHCS' actions also reduced the health plans' incentives to expand their provider networks to include providers within reasonable distances of their beneficiaries. The Regional Model beneficiaries also generally received a lower quality of care than beneficiaries in other areas of the State, although that quality has recently improved as a result of DHCS' enforcement of the health plans' quality-of-care requirements.

When transitioning the Regional Model counties in 2013 from a fee-for-service delivery system to managed care, DHCS did not adequately assist the counties in identifying the options available to them, despite some counties expressing interest in joining a county organized health system (COHS). The COHS Model, used in 22 other counties in the State, may provide beneficiaries in the Regional Model counties with better access to care than they receive through their current health plans. Establishing a COHS would likely provide the beneficiaries with access to a greater proportion of the Medi-Cal providers in their geographic areas, thereby reducing the distances that the beneficiaries would need to travel to receive care. Because DHCS plans to establish new managed care contracts with the health plans currently serving the Regional Model counties after its current contracts expire in 2023, it is an ideal time for DHCS to evaluate whether the COHS Model would be better suited to provide reasonable access to care and to assist counties with making such a transition if they desire to do so.

Respectfully submitted,

A handwritten signature in black ink that reads "Elaine M. Howle". The signature is written in a cursive, flowing style.

ELAINE M. HOWLE, CPA
California State Auditor

Selected Abbreviations Used in This Report

CAP	corrective action plan
CMS	Centers for Medicare & Medicaid Services
COHS	county organized health system
DHCS	Department of Health Care Services
HEDIS	Healthcare Effectiveness Data and Information Set
Managed Health Care	Department of Managed Health Care
Regional Model	New managed care model into which DHCS grouped 18 rural expansion counties in 2012
rural expansion counties	The 28 counties that state law required DHCS to transition to managed care in 2012

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Summary

Results in Brief

In 2012 state law required the Department of Health Care Services (DHCS) to transition the recipients of California Medical Assistance Program (Medi-Cal) services (beneficiaries) in 28 fee-for-service counties in rural areas (rural expansion counties) to managed care. In contrast to the fee-for-service delivery system in which a beneficiary seeks medical care from a Medi-Cal provider and that provider then bills the Medi-Cal program for the individual service, in the managed care delivery system, DHCS contracts with and pays monthly rates to health plans to coordinate and administer services to beneficiaries enrolled in these plans. Eight of the 28 counties chose to join a nonprofit health plan called Partnership Health Plan of California (Partnership) that operated under county oversight, while DHCS worked with two other counties to establish their own unique models for providing health care. DHCS grouped the remaining 18 counties into a new managed care model that it called the *Regional Model*. DHCS then contracted with two commercial health plans—Anthem Blue Cross Partnership Plan (Anthem) and California Health & Wellness (Health & Wellness)—to deliver managed care services to the beneficiaries covered under the Regional Model. The Joint Legislative Audit Committee requested that we determine whether the Regional Model beneficiaries have received an acceptable level of care and to evaluate how that care compares to the care beneficiaries in other models have received. *Acceptable level of care* is not a standard term DHCS uses, so for the purposes of this audit, we have defined the term to mean adequate access to care combined with adequate quality of care. Under this definition, beneficiaries in the Regional Model have not received an acceptable level of care.

Most significantly, even though Partnership operates in comparable rural counties, the two Regional Model health plans have provided beneficiaries with worse access to care than Partnership has provided its beneficiaries. In fact, our analysis showed that the Regional Model health plans have required some beneficiaries to travel hundreds of miles to reach certain health care providers, including obstetricians, oncologists, neurologists, and pulmonologists. In many instances, these distances far exceeded the distances that Partnership required its beneficiaries to travel for similar care. For example, according to DHCS' January 2019 provider location data, Partnership required rural beneficiaries to travel up to 60 miles for an appointment with a cardiologist compared to 239 miles for Anthem and 115 miles for Health & Wellness.

Audit Highlights . . .

Our audit of DHCS' oversight of managed care in the Regional Model counties revealed the following:

» *The Regional Model health plans have not provided all Medi-Cal beneficiaries with adequate access to care.*

- *DHCS did not enforce state requirements that limit the distances health plans may direct their Medi-Cal beneficiaries to travel to receive health care—some beneficiaries were required to travel hundreds of miles to receive care.*

- *DHCS failed to hold Regional Model Health plans accountable for improving beneficiaries' access to care.*

» *Regional Model beneficiaries have generally received a lower quality of care than beneficiaries in other areas of the State.*

» *DHCS did not adequately educate the Regional Model counties about the options available to them regarding their transition to managed care.*

- *It did not assist Regional Model counties that wanted to create or join a COHS, which may have provided its beneficiaries with better access to care.*

Regional Model beneficiaries had to travel such long distances in part because most of the providers that contracted with the Regional Model health plans contracted with only one of the two health plans. Consequently, a beneficiary of one plan might have to travel significantly farther for care than a beneficiary of the other plan from the same location who was seeking the same care. For example, according to DHCS' January 2019 provider location data, a resident of Olancho in Inyo County who was seeking oncologist care would need to travel 60 miles to Ridgecrest if he were an Anthem beneficiary; however, if he were a Health & Wellness beneficiary, he would need to travel more than 150 miles to Burbank for the same care because Health & Wellness did not have a contract with the closer provider. When health plans require beneficiaries to travel this far to receive care, those beneficiaries may be unable or unwilling to do so.

In many cases, the distances that the Regional Model health plans required far exceeded the limits state law imposes, which range from 10 to 60 miles depending on the type of service. Nonetheless, DHCS did not effectively intervene when health plans did not meet these access requirements as it did when it found that health plans were not meeting quality standards. Instead, after the current distance and travel time requirements first became effective in 2018, DHCS ultimately approved all the requested exceptions to the access requirements even though it had not evaluated whether the health plans had exhausted all other reasonable options to identify providers that would meet those requirements. As a result, all the health plans—including those in the Regional Model counties—remained in compliance with state law because of those approvals even though the distances that the plans required beneficiaries to travel did not comply. If DHCS had placed health plans on corrective action plans (CAPs) pertaining to access to care instead of approving their exception requests, it might have motivated them to improve their provider networks. By establishing CAPs, DHCS could also have required the health plans to pay for out-of-network care for beneficiaries that did not have adequate access to care. However, by approving the health plans' requests for exceptions to travel-distance requirements, DHCS reduced their incentives to improve their networks and undermined the intent of the law, which is to provide beneficiaries access to care within prescribed distance limits.

In addition, the Regional Model health plans have consistently provided a lower quality of care than many other plans in the State. Specifically, from 2015 through 2018, DHCS determined that the health plans in all 28 rural expansion counties performed below a number of national minimum performance levels. Further, when the Department of Managed Health Care—which state law authorized to perform audits on behalf of DHCS—audited the

rural expansion counties' health plans from 2014 through 2016, it identified more serious deficiencies in the 18 Regional Model plans than in the health plans of the other 10 rural expansion counties. However, because DHCS has taken steps to address these types of issues, such as imposing CAPs, the quality of care in the Regional Model counties has steadily improved in recent years.

DHCS provided the counties with only limited guidance and information to assist them in their transition to managed care. As the agency responsible for overseeing the effective delivery of health care to Medi-Cal beneficiaries throughout the State, DHCS should have proactively educated the rural expansion counties on the available managed care model options before they transitioned to managed care and thus better ensured that the counties would select models that would best serve their beneficiaries' needs. According to DHCS, the limited-guidance approach had worked well when it transitioned other counties to managed care before 2012. However, this approach was not as effective for the rural expansion counties because many of them lacked the knowledge and resources to determine the model that would best serve their beneficiaries.

We believe that DHCS could improve the future access to managed care services of the Regional Model beneficiaries by assisting counties in transitioning from the Regional Model to a county organized health system (COHS). Partnership—the health plan that currently serves eight of the 28 rural expansion counties and has generally provided adequate access within those counties—is a COHS that non-rural expansion counties established before the rural expansion. In contrast to the Regional Model, a COHS uses a single health plan to deliver services to all of its beneficiaries. Consequently, these beneficiaries can receive care from the same network of providers unlike in the Regional Model in which the two health plans frequently contract with different providers. Further, a COHS operates under the direct influence of county officials who make up a portion of its board of commissioners. The counties are therefore better able to direct the COHS to use its resources to address the specific needs of their beneficiaries. Although many variables affect health plans' abilities to establish provider networks that deliver acceptable access to care, a COHS might enable better access to care in the Regional Model counties.

Transitioning the Regional Model counties to a COHS will be possible after DHCS' contract with Anthem expires in 2023. However, transitioning from the Regional Model to a multicounty COHS would require the counties to complete a number of necessary start-up activities, including establishing a special commission, hiring administrative staff, and gaining federal approval. Because the Regional Model counties tend to have

fewer resources than other counties, they will likely need DHCS' assistance in performing these activities. If Regional Model counties wish to be in a COHS, DHCS would need to immediately begin efforts to allow for a smooth transition for these counties' beneficiaries. By providing the counties with assistance in creating a COHS, DHCS could ensure that Regional Model beneficiaries are better able to receive the health care services that they need.

Summary of Recommendations

To obtain assurance that health plans throughout the State have exhausted all of their reasonable options to meet the access requirements before seeking exceptions, DHCS should immediately begin doing the following:

- Develop written guidance that specifies the conditions under which staff should approve, deny, or contact health plans for clarification regarding their requests for exceptions.
- Determine a specific minimum number of providers that health plans must attempt to contract with before requesting an exception.
- Require health plans to report on their attempts to contract with providers when submitting their requests, including providing evidence of their efforts, such as the contact information for each provider with which they have attempted to contract.
- Establish a process for periodically verifying the health plans' efforts, such as contacting a sample of the listed providers and determining whether the plans attempted to contract with them.
- Require health plans to authorize out-of-network care if they do not demonstrate they have exhausted all of their reasonable options to meet the access requirements.

To ensure that beneficiaries in the Regional Model counties have reasonable access to care, DHCS should do the following by June 2020:

- Determine the specific causes of Anthem's and Health & Wellness's inability to provide reasonable access to care in the Regional Model counties.
- Evaluate whether the structural characteristics of a COHS Model would be better suited to providing reasonable access to care in these counties and notify the counties of its conclusions. If some

or all of the counties desire to transition to a COHS, DHCS should assist them in making that change after their current contracts expire.

- Evaluate whether it has the financial resources to provide assistance to counties interested in establishing a COHS or other managed care model after the current Regional Model contracts expire. If DHCS does not have the required financial resources, it should seek an appropriate amount of funding from the Legislature.
- Provide counties with reasonable opportunities to decide whether to change their managed care models after the expiration of their current contracts. DHCS should provide counties that choose to do so sufficient time to establish their new models before the expiration of their current agreements to ensure continuity of service.

Agency Comments

Although DHCS agreed with most of our recommendations, it disagreed with several recommendations, stating that it will not implement them.

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Introduction

Background

Under the oversight of the Centers for Medicare & Medicaid Services (CMS), the federal Medicaid program authorizes grants to states for medical assistance to low-income individuals and families who meet federal and state eligibility requirements. In 1966 California began participating in the federal Medicaid program through its California Medical Assistance Program (Medi-Cal). The Department of Health Care Services (DHCS) is the designated state agency responsible for administering Medi-Cal. In December 2013, before the implementation of the Affordable Care Act in 2014, the Medi-Cal program had 8.6 million enrolled beneficiaries. As of November 2018, the Medi-Cal program provided services to 13 million enrolled beneficiaries—nearly one-third of California’s residents. During fiscal year 2018–19, the Governor’s budget funded DHCS with more than \$102 billion, of which more than \$21 billion came from the State’s General Fund.

Since the 1970s, the State has gradually transitioned Medi-Cal beneficiaries by county from fee-for-service delivery systems to managed care systems. When the State first established the Medi-Cal program, it relied solely on the fee-for-service system, under which beneficiaries choose the health care professionals from whom they receive care, and those professionals then bill DHCS directly for the approved services that they provide to the beneficiaries. Before 2012 DHCS transitioned 30 counties to managed care systems because of its belief that members enrolled in managed care can receive care coordination and case management services that are not available through the fee-for-service system. In 2012 state law required DHCS to transition the remaining 28 fee-for-service Medi-Cal counties, which DHCS refers to as the *rural expansion counties* because many are largely rural, to managed care.¹ Other states have also provided services to beneficiaries through managed care in a similar manner. Specifically, the four states that we reviewed—Arizona, Florida, Washington, and Oregon—all have enrolled the majority of their Medicaid beneficiaries in managed care and have continuously worked on expanding managed care over the last decade.

¹ The timeline for implementing the 2013 transition of the rural expansion counties to managed care was prompted in part by the State’s decision to end its Healthy Families program, a program that provided and promoted access to affordable health care services for families. The State wanted to continue providing managed care services to the individuals who had participated in that program.

Under managed care, DHCS contracts with managed care health plans and pays monthly capitation payments—a specified amount per person covered—to each plan to administer beneficiaries’ services and pay health care professionals. In turn, the health plans establish provider networks by contracting with medical professionals and groups, known as *providers*, who supply health care to the beneficiaries. Establishing such a network allows health plans to monitor the quality of the providers that serve their beneficiaries, such as through conducting site reviews and monitoring providers’ data. The health plans’ provider networks include providers located within the counties where the plans’ beneficiaries live; in nearby counties; and—at times—in adjacent states, such as Oregon and Nevada. As we discuss in more detail below, some of the State’s managed care health plans are privately owned while counties oversee the others.

DHCS Established the Regional Model in 2013

As part of the State’s transition process from fee-for-service to managed care, DHCS has approved six models of managed care that it uses to contract with health plans to deliver services. Table 1 summarizes the models and the types of health plans that operate within each model, and Figure 1 identifies each county’s model. When transitioning counties to managed care, DHCS has allowed them to pursue various options, including establishing their own health plans, joining existing health plans that other counties had established, or contracting with a commercial health plan. The county-operated health plan options include a county organized health system (COHS), which provides health care through a single nonprofit health plan under county oversight, and a local initiative, which is a health plan with county oversight that provides services to beneficiaries in Two-Plan Model counties. For counties that did not join or create county-overseen health plans—either because they chose not to or were unsuccessful in doing so—DHCS contracted with commercial health plans. According to DHCS, this approach has worked well because it ensured that DHCS could establish managed care regardless of a county’s willingness to create or join a COHS or local initiative but also allowed counties to do so if they had the ability and desire. The four other states we previously mentioned also contract with both commercial and nonprofit health plans to provide services to beneficiaries.

DHCS transitioned the rural expansion counties from fee-for-service to managed care in 2013. Figure 1 shows that of the 28 rural expansion counties, eight joined a COHS administered by Partnership Health Plan of California (Partnership), and DHCS worked with two to form their own unique models. Because none of the remaining 18 counties joined or created county-overseen

health plans, DHCS grouped them to create the Regional Model, which is the focus of this audit. In 2013 DHCS contracted with two commercial health plans, Anthem Blue Cross Partnership Plan (Anthem) and California Health & Wellness (Health & Wellness), to serve the Regional Model counties. When selecting health plans, DHCS intended to contract with additional health plans that met its selection criteria, but Anthem and Health & Wellness were the only plans that qualified. DHCS initially contracted with these health plans for five years, from 2013 to 2018, but it has since extended both contracts. We discuss DHCS’ contracts with the two plans in more detail in Chapter 2.

Table 1
DHCS Has Six Models of Managed Care That Involve Different Types of Health Plans

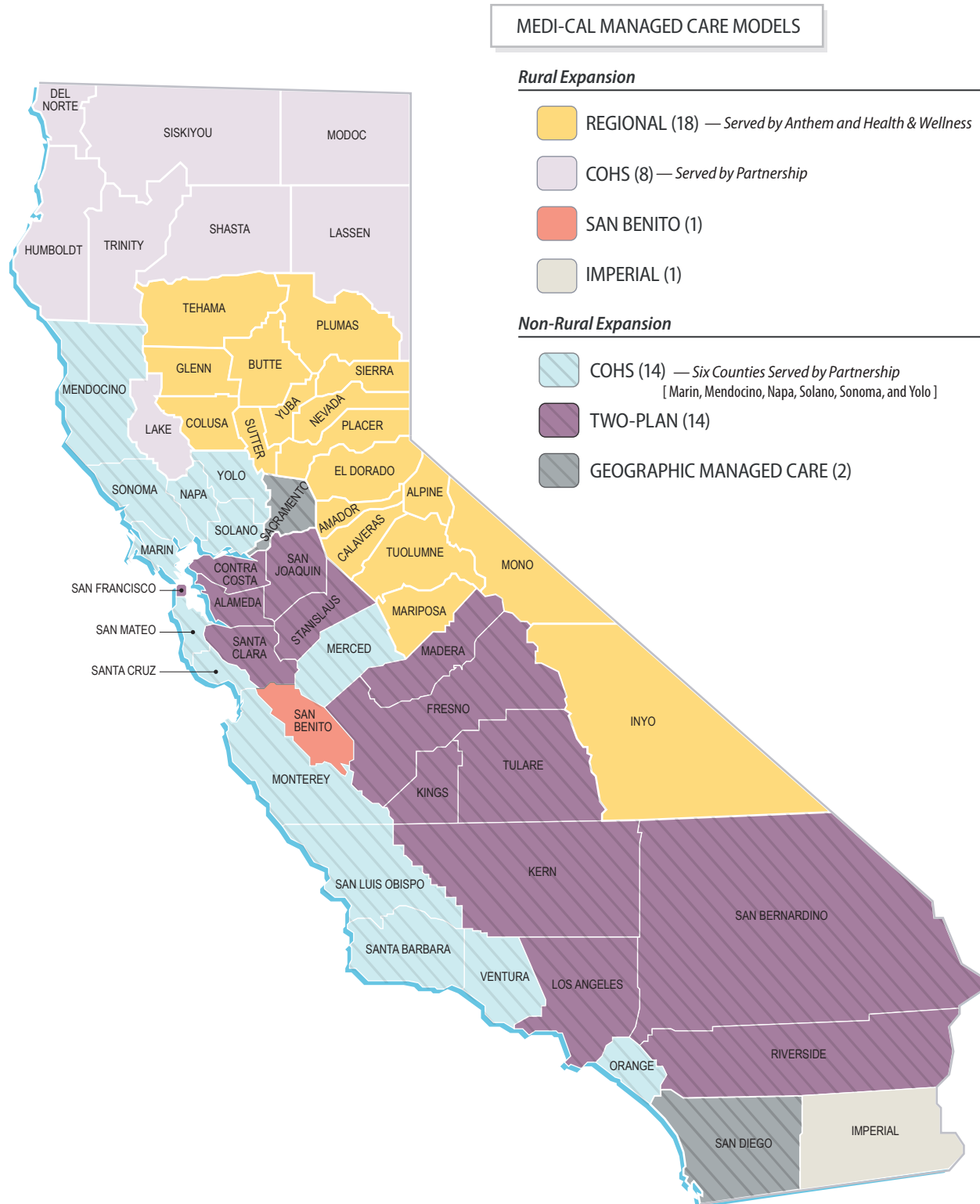
MANAGED CARE MODEL	DESCRIPTION	NUMBER OF COUNTIES
Regional	Beneficiaries may select one of two commercial health plans.	18
COHS	Beneficiaries receive services from a single, nonprofit health plan with county oversight.	22
San Benito	Beneficiaries select either to receive managed care delivered by a commercial health plan or to receive fee-for-service through Medi-Cal.	1
Imperial	Beneficiaries may select one of two commercial health plans; one of the health plans has county oversight.	1
Two-Plan	Beneficiaries may select between one commercial health plan and one local initiative, which is a health plan with county oversight.	14
Geographic Managed Care	Beneficiaries may select from three or more commercial health plans.	2

Source: Analysis of data from DHCS’ Medi-Cal managed care website, a DHCS presentation on Medi-Cal managed care, DHCS reports, Calviva Health’s website, and an Imperial County Board of Supervisors resolution.

Two Agencies Share Responsibility for Overseeing Health Plans That Participate in Medi-Cal

DHCS and the Department of Managed Health Care (Managed Health Care) are responsible for overseeing most health plans that contract with providers to deliver Medi-Cal care to beneficiaries. As part of its role to administer Medi-Cal, DHCS manages the health plans’ contracts and oversees their compliance with the terms of those contracts. In its role in protecting health care rights of consumers, Managed Health Care licenses health plans that are subject to the Knox-Keene Act—a state law that regulates most commercial health plans—and monitors their service delivery. Both departments evaluate whether the health plans are performing adequately by auditing their service delivery processes in areas such as access to care and quality of care.

Figure 1
All 58 of California’s Counties Now Receive Medi-Cal Through Managed Care Models



Source: Analysis of data from DHCS’ Medi-Cal managed care website, a DHCS presentation on Medi-Cal managed care, and DHCS’ reports.

DHCS and Managed Health Care determine whether the health plans have provided adequate access to care and quality of care by assessing whether the plans meet the requirements established by law and the health plans' contracts. For access to care, these requirements address providers' availability to schedule appointments for beneficiaries within specific numbers of days, the distance beneficiaries must travel to obtain specified care, and the travel time needed for beneficiaries to arrive at the providers' locations. For quality of care, the requirements include providers' delivery of specific services, such as preventive services and some post-appointment follow-up services; the outcomes of some providers' service delivery; and the health plans' performance of certain administrative activities, such as authorizing service requests and addressing grievance claims. For the purposes of this audit, we focused our evaluation of the Regional Model health plans' performance on the specific indicators that the text box lists.

This Audit's Criteria for Evaluating Health Plan Performance

- **Access to Care:** Whether the health plans have met travel distance requirements.
- **Quality of Care:** How frequently the health plans' performances on national performance quality measures fell below acceptable levels.
- **Quality of Care:** Whether DHCS or Managed Health Care determined through their audits that the health plans were not meeting contractual quality-of-service delivery requirements.

Source: Analysis of state law and health plans' contracts.

State Law Establishes Limits on the Distances Health Plans Can Require Beneficiaries to Travel to Receive Care

Effective January 2018, state law established access requirements, which are predefined limitations on the times and distances Medi-Cal plans may require their beneficiaries to travel to obtain care. The Legislature passed the law in response to regulations that CMS issued in 2016 requiring states contracting with managed care plans to develop and enforce by 2018 time and distance standards for primary, specialty, hospital, and pharmacy services.² As the State's administrator of Medi-Cal, DHCS assumed responsibility for developing these requirements, which it did in 2016 and 2017, also establishing an evaluation process to ensure that those standards were reasonable. As part of that process, DHCS considered industry standards and solicited feedback from health plans and other stakeholders. Additionally, it analyzed data on the quantity of providers, the location of providers, and beneficiaries' use of services to identify the extent of beneficiaries' needs and the availability of providers to administer care.

When developing the access requirements, DHCS also considered the unique challenges of providing access in rural areas, such as the geographic dispersion of providers and beneficiaries; as

² State law requires health plans to evaluate whether they can meet travel distance standards for 36 different types of providers as well as pharmacies, hospitals, and mental health outpatient services for each area they serve.

a result, it established more lenient access standards for health plans operating in those locations. For primary care services, such as cancer screenings and vaccinations, DHCS established a universal requirement for all counties that aligns with a preexisting requirement in its contracts with managed care plans: within 10 miles or 30 minutes travel time from a beneficiary's residence to the provider's location. For specialty care, such as psychiatry and dermatology, DHCS created requirements based on four defined categories of counties' population densities: dense, medium, small, or rural. In dense counties like Sacramento and San Francisco, health plans must ensure beneficiaries can access specialty care within 15 miles or 30 minutes. In rural counties, such as Alpine or Inyo, health plans must ensure that their beneficiaries are able to access care within 60 miles or 90 minutes.

DHCS uses an annual network certification process to determine whether health plans are complying with the access requirements, as state law requires. It verifies the health plans' compliance in each zip code they serve by requiring them to indicate the locations of all of their providers. Using these data, DHCS calculates the time and distance required to travel to the plans' nearest providers from each zip code. In principle, for a health plan to pass the annual network certification, it would need to contract with a sufficient number of providers to ensure that beneficiaries in every zip code it serves can access care without having to travel farther than the distances specified by the access requirements.

State law also authorizes DHCS to exempt health plans from meeting the access requirements and to establish alternative requirements for them. Specifically, DHCS may allow alternative access standards upon the request of a health plan if the plan has exhausted all other reasonable options to secure local providers that meet the applicable requirement. When DHCS allows alternative access standards, it establishes the health plan's alternative standard as the distance between the location in question and the health plan's closest available provider.

DHCS Requires Health Plans to Meet Specific Performance Levels

Federal regulations also require the State to annually measure and report the quality of care that Medi-Cal managed care health plans provide using a set of standardized performance measures. To comply with this requirement, DHCS uses a selection of performance measures primarily from the Healthcare Effectiveness Data and Information Set (HEDIS), which the National Committee for Quality Assurance developed. HEDIS is a nationally accepted set of measures for assessing health plans' performance, and DHCS uses HEDIS to evaluate health plans' delivery of preventive

services, provision of care for chronic conditions, and appropriate treatment and utilization of services. For example, DHCS evaluates plans against HEDIS measures such as the percentage of eligible beneficiaries who receive breast cancer screenings and the percentage of beneficiaries with persistent asthma who are prescribed appropriate medication.

DHCS' contracts with health plans require the plans to score at or above minimum performance levels for a selection of HEDIS measures. DHCS establishes these minimum performance levels based on the national performance of the Medicaid program. Specifically, DHCS expects plans to perform in the top 75 percent of Medicaid plans nationally.³ Health plans report their performance for each of their reporting units, which correspond to counties or groups of counties that the plans serve. For example, the Regional Model has two reporting units, which together represent the model's 18 counties. The number of measures for which DHCS holds plans accountable may vary from year to year because it periodically adds or removes HEDIS measures to align with its areas of focus, such as maternal and child health, for quality improvement. When DHCS requires health plans to report on newly added measures, it does not require the health plans to meet the minimum performance levels until the second year in which those measures are in place.

Counties Are Important Stakeholders in the Medi-Cal System

County health agencies are key to Medi-Cal because they may participate as advocates for beneficiaries, as providers who serve beneficiaries, and as administrators of health plans. In addition, state law requires county health agencies to initially determine which applicants are eligible for Medi-Cal and to assist the applicants in the application process as needed. As advocates, county health agencies may assist beneficiaries who have questions or are experiencing difficulty receiving services. For example, some counties help beneficiaries schedule appointments with providers and arrange transportation for them to attend appointments. Additionally, counties serve as primary providers for some beneficiaries in rural areas of the State through county-operated clinics. Finally, several counties are involved in administering health plans through a COHS or through a local initiative in Two-Plan Model counties.

³ DHCS plans to modify its performance measurement process in 2020. DHCS will expect health plans to perform in the top 50 percent of Medicaid plans nationally to meet minimum performance levels, and it will select performance measures from lists published by CMS.

As a result of the many functions county health agencies perform in the Medi-Cal system, they often have specific expertise about the local conditions within their communities and may have experience working with local providers. Consequently, they are well-positioned to negotiate and collaborate with health plans and with DHCS to improve the level of care beneficiaries receive.

Chapter 1

DHCS HAS ALLOWED HEALTH PLANS TO REQUIRE SOME OF THEIR MEDI-CAL BENEFICIARIES TO TRAVEL HUNDREDS OF MILES TO RECEIVE CARE

Chapter Summary

The Regional Model health plans have not provided all beneficiaries with adequate access to care. As a result, some beneficiaries in Regional Model counties may have had to travel hundreds of miles to receive medical care from in-network providers of one health plan, even though the same care was available from closer providers who contracted with the other health plan. During the period we reviewed, DHCS failed to hold health plans accountable when they did not provide beneficiaries with access to care that met state requirements. Instead, it reduced the plans' incentives to improve their provider networks by excusing them from meeting these requirements, even though it had not ensured that they had exhausted all of their reasonable options to secure local providers as state law requires. Our analysis indicates that some beneficiaries' access to care would improve dramatically if DHCS were to require health plans to allow beneficiaries to obtain care from out-of-network providers that are closer to them when the plans are unable to provide adequate access themselves.

Additionally, the HEDIS scores for health plans in the rural expansion counties indicate that beneficiaries in these counties have generally received a lower quality of care than beneficiaries in other areas of the State. According to the HEDIS scores, the quality of care that Anthem and Health & Wellness provided in the Regional Model counties was comparable to the care that Partnership—a COHS that serves eight rural expansion counties—provided in its counties. However, Managed Health Care's audits of the rural expansion counties suggest that Anthem and Health & Wellness experienced greater difficulty meeting contractual requirements pertaining to quality of care than Partnership did. In addition, DHCS has limited the counties' abilities to respond to those problems and assist their beneficiaries in receiving adequate services because it has not taken adequate steps to share with the counties the deficiencies it and Managed Health Care have identified.

Some Beneficiaries in Regional Model Counties Have Had Poor Access to Care

The Regional Model health plans have required some beneficiaries to travel excessive distances to obtain medical care from providers. In most cases, managed care beneficiaries may receive medical care

only from the contracted providers within their plan's network. In this way, health plans choose the providers that beneficiaries may visit to obtain medical care. Within the Regional Model counties, the distances that beneficiaries have had to travel to access the closest contracted providers have varied widely, from less than 10 miles to 365 miles. Table 2 identifies the distances some beneficiaries within these counties have had to travel to receive specific health care.

Table 2
The Regional Model Health Plans Have Required Some Beneficiaries to Travel Unreasonable Distances to Access Care

PROVIDER TYPE	MAXIMUM DISTANCE REQUIRED TO ACCESS CARE (IN MILES)		
	REGIONAL MODEL		COHS
	ANTHEM	HEALTH & WELLNESS	PARTNERSHIP
Specialty Care			
Cardiology/Interventional Cardiology	239	115	60
Dermatology	272	365	60
Endocrinology	313	225	60
ENT/Otolaryngology	343	200	60
Gastroenterology	83	150	60
General Surgery	123	115	60
Hematology	99	200	165
HIV/AIDS Specialists/Infectious Diseases	324	140	60
Mental Health (Nonpsychiatry) Outpatient Services*	83	60	60
Nephrology	124	230	60
Neurology	300	215	60
OB/GYN Specialty Care*	164	60	60
Oncology	299	170	120
Ophthalmology	81	60	120
Orthopedic Surgery	164	150	60
Physical Medicine and Rehabilitation	327	220	120
Psychiatry	327	170	60
Pulmonology	327	180	60
Primary Care			
OB/GYN Primary Care	NA†	230	10
Primary Care Physician	10	85	45
Other Provider Types			
Hospital	81	120	45
Pharmacy	45	90	10

Source: Analysis of the most recent alternative access standards that DHCS had approved as of January 2019.

NA = Not applicable.

* We include OB/GYN Specialty Care and Mental Health (Nonpsychiatry) Outpatient Services with other specialists because they have the same time and distance standards.

† Anthem was exempt from this requirement because it does not designate its OB/GYN providers as primary care physicians.

Although it may be difficult for health plans to provide beneficiaries with close access to care when those beneficiaries reside in remote regions of the State, we would expect this difficulty to equally affect all the health plans that serve rural counties. However, as Table 2 also shows, Partnership provided its beneficiaries in rural counties with access to most care within 60 miles. Moreover, the longest distances beneficiaries had to travel to receive care in Partnership's counties were generally much shorter than those that Regional Model beneficiaries were required to travel for the same care. For example, Table 2 shows that Partnership required rural beneficiaries to travel up to 60 miles for an appointment with a cardiologist compared to 239 miles for Anthem and 115 miles for Health & Wellness. The additional distances that Anthem and Health & Wellness have required their beneficiaries to travel may have deterred some beneficiaries from seeking care.

We also identified inconsistencies between the distances that Anthem and Health & Wellness required their beneficiaries from the same locations to travel for the same care. When we reviewed provider location data that the two health plans submitted to DHCS, we identified more than 100 instances in which either of the plans required its beneficiaries to travel at least 100 miles farther than the other plan for the same care. In the five most extreme cases, the difference between the two plans ranged from 255 to 305 miles. For example, DHCS' data indicate that a beneficiary of Health & Wellness residing in June Lake, in Mono County, who needed to take her child to a pediatric dermatologist would have been required to travel up to 365 miles while if the same beneficiary were with Anthem, she would only have been required to travel up to 60 miles.

On some occasions, Anthem and Health & Wellness each required its beneficiaries to travel significantly farther than the other plan required of its beneficiaries. As Figure 2 shows, a beneficiary of Health & Wellness residing in Olancho, in Inyo County, who needed to see an oncologist would have to travel more than 150 miles to Burbank to receive cancer treatment. However, if this same beneficiary were with Anthem, he would have to travel only 60 miles for the same care. Similarly, a beneficiary of Anthem residing in Tecopa, also in Inyo County, who needed to see a pulmonologist, would have had to travel 327 miles, which is more than 175 miles farther to receive asthma treatment than if she were with Health & Wellness.

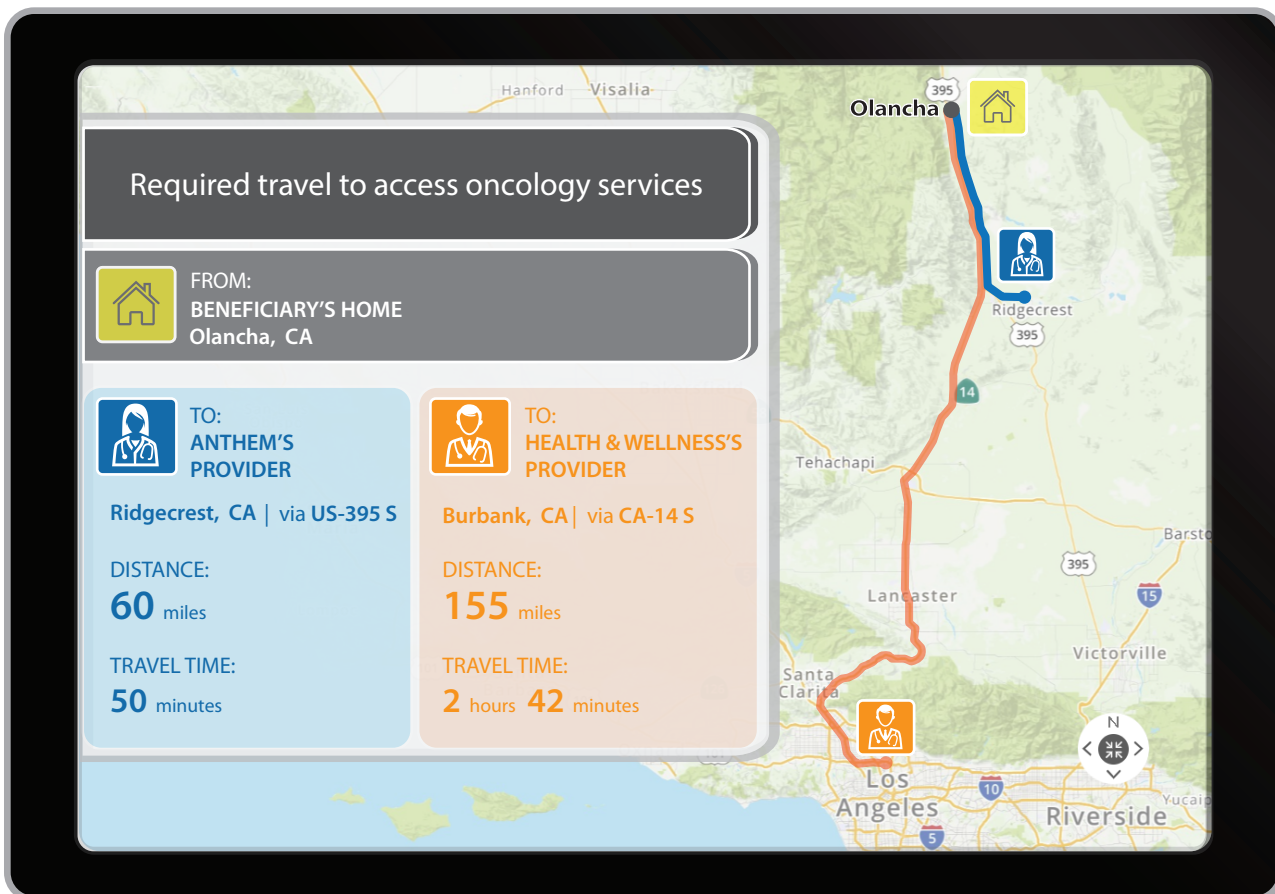
The differences in the distance requirements between the two health plans are also noticeable in more densely populated areas of the Regional Model counties. For example, according to the January 2019 data, a beneficiary of Health & Wellness who needed to take his child to visit a pediatric cardiologist and who resided in the Lake Tahoe community of Kings Beach in Placer County—

We identified inconsistencies between the distances that Anthem and Health & Wellness required their beneficiaries from the same locations to travel for the same care.

which is more densely populated than many other rural expansion counties—would have to travel up to 70 miles farther than an Anthem beneficiary from the same location who sought that same service. As we discuss in more detail below, these instances suggest that the difference in distances is not always the result of a general lack of providers but rather a lack of providers who have contracted with a specific Regional Model health plan. In other words, some beneficiaries may live reasonably close to providers who offer the needed care; however, those providers are not in-network for their plans. Although beneficiaries have the right to switch health plans, doing so may disrupt the continuity of the care they receive because they may not be able to continue seeing their primary care physicians and other providers from whom they have already received care.

Figure 2

The Two Regional Model Health Plans May Require Beneficiaries in the Same Location to Travel Significantly Different Distances to Receive the Same Services



Source: Analysis of the alternative access standards that DHCS had approved as of January 2019, Anthem's Medi-Cal provider directory, and Google Maps.

Traveling significant distances to reach providers may limit beneficiaries' ability to receive care. A beneficiary who has to travel hundreds of miles to receive medical care might be forced to miss an entire day of work and lose wages—a loss that might be critical considering that beneficiaries who qualify for Medi-Cal while employed have limited incomes. Further, some beneficiaries might be unable to tolerate the physical hardship of traveling such substantial distances for health care. When health issues require multiple visits, it likely will exacerbate such concerns: for example, the U.S. Department of Health and Human Services suggests weekly appointments for pregnant women nearing their delivery dates.⁴ If beneficiaries are unwilling or unable to seek care because of the distances required to do so, it undermines the fundamental purpose of the Medi-Cal program, which is to improve the overall health and well-being of all residents by providing access to affordable, integrated, and high-quality health care.

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DHCS Has Failed to Hold Regional Model Health Plans Accountable for Improving Beneficiaries' Access to Care

As we discuss in the Introduction, DHCS uses a network certification process to assess whether health plans are complying with state access requirements. DHCS published the initial results of its first annual network certification in June 2018 and finalized the results in January 2019. These results, which remain in effect until July 2019, indicate that DHCS granted alternative access standards to the State's health plans in nearly 10,000 instances in which they requested them. More than 1,000 of these 10,000 instances involved the Regional Model health plans. On our website, we present an interactive map of the extended distances DHCS approved through alternative access standards by county and provider type. Given that DHCS made a considerable effort in 2016 and 2017 to ensure that the access requirements that state law established were reasonable and that this effort included analyzing the availability of providers who could meet those requirements, we question why it has chosen not to enforce them. By approving alternative access standards, DHCS is not holding health plans accountable to meet the access requirements prescribed in state law. Instead, alternative access standards allow health plans to deviate from the prescribed requirements by extending the time and distance that they may require beneficiaries to travel for care.

⁴ Although state law requires health plans to provide transportation services to their beneficiaries in some instances, the beneficiaries would still incur significant travel time for extensive distances.

We are particularly concerned with DHCS' decision not to enforce these state requirements given the weaknesses we identified in its process for evaluating requests for alternative access standards. In particular, although DHCS denies requests for alternative access standards if they are incomplete or inaccurate, it has not adequately evaluated whether health plans have, in fact, exhausted all other reasonable options to identify providers that would meet the access requirements before approving their requests for alternative access standards, as state law requires. DHCS stated that it must approve requests for alternative access standards, no matter what the potential hardship those alternative standards may present to beneficiaries, as long as the health plans meet legal requirements, specifically that the plan exhausts all other reasonable options to contract with providers that would meet the access requirements. DHCS requires health plans to provide written explanations of their contracting efforts that it uses to evaluate whether they have complied with this requirement. However, DHCS does not analyze the validity of these explanations; thus, its approach does not meet the apparent intent of the law.

Even though DHCS has required health plans to provide written explanations, it has not required them to provide supporting documentation to corroborate those explanations. Moreover, DHCS has not verified with any providers mentioned in those explanations whether the plans attempted to add them to their networks. Additionally, DHCS has not established a minimum number of providers that the health plans should attempt to contract with in a designated location before it considers an exemption request. We question how DHCS could conclude that a health plan had exhausted all reasonable efforts to seek providers that met an access requirement without establishing such a minimum threshold and substantiating at least some of the health plan's efforts.

DHCS has not consistently enforced its requirements for the explanations health plans must include when requesting alternative access standards.

Moreover, DHCS has not consistently enforced its requirements for the explanations health plans must include when requesting alternative access standards. DHCS' instructions for making such requests state that health plans must detail their efforts to meet the access requirements in order for it to consider their requests. However, when we reviewed a selection of 30 approved requests for alternative access standards, we found six requests in which health plans prepared their explanations using the same boilerplate text for multiple requests. For example, Health & Wellness stated all of the following as its justification in each request for a pediatric specialist we reviewed: "There are no pediatric subspecialists located to meet the standard, the available pediatric specialists do not accept Medi-Cal patients, or the available pediatric specialists have declined to contract with the Plan primarily due to capacity constraints." In none of these cases did the plan identify the specific condition that applied to the request. Similarly, Anthem

stated in some requests that no providers were in the area, yet we identified providers in the area that met the prescribed requirements. We determined that DHCS did follow up in some instances by requesting additional documentation when the health plan provided vague or inaccurate explanations, such as when it submitted a request with inaccurate provider information. DHCS acknowledged that its staff did not consistently identify when further clarification was necessary. This inconsistency can likely be attributed to DHCS' lack of formal guidance specifying the conditions under which a request should be approved or denied.

By approving alternative access standards without proper justification, DHCS has reduced incentives for health plans to improve their beneficiaries' access to care. When a health plan fails to comply with the access requirements specified in state law, DHCS has the authority to require that it complete a corrective action plan (CAP) to improve its provider network, which DHCS calls a *network certification CAP*. Network certification CAPs require health plans to make the necessary improvements to comply with the access requirements, such as contracting with providers that meet the travel distance requirements. DHCS initially placed health plans on network certification CAPs in 2018 but closed them after approving alternative access standard requests for those health plans that were still unable to meet access requirements. However, it approved those requests even when the health plans did not demonstrate that they had exhausted all reasonable options to obtain closer providers. As a result, DHCS' approval of such alternative access standards involving excessive distances was unreasonable. By enforcing network certification CAPs rather than approving unsupported requests for alternative access standards, DHCS could have ensured that health plans remained obligated to improve their networks.

Further, DHCS could have used network certification CAPs to provide some beneficiaries access to closer providers. Through such CAPs, DHCS may require health plans to temporarily allow beneficiaries to obtain medical care from out-of-network providers, provided that those out-of-network providers do not have a history of quality issues and are willing to accept reasonable rates as determined by the health plans. Although there is no assurance that out-of-network providers will agree to offer such care, a network certification CAP requiring plans to authorize out-of-network care to meet time and distance requirements would provide beneficiaries with greater opportunities to access care. As we previously describe, we identified multiple instances under the Regional Model in which either health plan's nearest in-network provider was significantly farther than the other health plan's provider. In such cases, the ability to seek care from out-of-network providers could significantly improve some beneficiaries' access to care.

By approving alternative access standards without proper justification, DHCS has reduced incentives for health plans to improve their beneficiaries' access to care.

Although DHCS requests that the health plans provide rate information when requesting alternative access standards, it has not required them to do so.

DHCS expressed concern to us that providers might demand unreasonably high rates from health plans if they were aware that DHCS would not approve certain requests, which could burden the health plans financially and could result in increased rates that DHCS would have to pay the health plans. However, we disagree with this reasoning. DHCS could enforce the state requirements on the distances health plans may require beneficiaries to travel but allow exceptions if there are no closer providers or if health plans can demonstrate that the rates providers have requested are unreasonably high. Although DHCS requests that the health plans provide rate information when requesting alternative access standards, in practice it has not required them to do so. None of the health plans provided this information for the 30 requests that we reviewed. When health plans are unable to demonstrate that nearby, available providers are demanding unreasonably high rates, neither they nor DHCS can justify the reasonableness of their requests for alternative access standards that require beneficiaries to travel excessive distances.

When we asked DHCS for its perspective regarding the weaknesses we identified in its process for evaluating and approving requests for alternative access standards during its 2018 network certification, DHCS indicated that it intends to continually adjust its procedures for evaluating health plans' requests based on the lessons it learns through each annual certification. However, DHCS did not inform us of the specific outcomes it desires to achieve through its adjustments. Instead, it informed us that as part of the 2019 network certification that it expects to complete in January 2020, it has already made changes to its process and anticipates implementing additional changes as part of its next network certification in 2020.

Although DHCS' recent efforts may address some elements of its process, these efforts do not resolve certain concerns we identified pertaining to access to care. For instance, DHCS informed us that it plans to reject health plans' requests that do not include supporting documentation to demonstrate that they attempted to contract with closer providers. However, we believe that this approach is insufficient because, according to DHCS, it would only be requiring health plans to demonstrate attempts to contract with a single provider. Consequently, that effort would not fulfill the intent of state law—requiring health plans to *exhaust all reasonable options* to obtain providers that meet access requirements—because health plans would likely have multiple providers available to them that they could attempt to contract with. Additionally, DHCS indicated that it plans to deny requests that it deems unreasonable, yet it has not developed formal guidance for its staff to use in making that determination. Without establishing such guidance for its staff and ensuring that health plans attempt to contract with multiple providers, DHCS will likely continue to approve requests that

unjustifiably excuse health plans from their obligation to meet access requirements and allow them to require beneficiaries to travel unreasonable distances to obtain care.

The Structure DHCS Selected for the Regional Model May Have Contributed to Some Beneficiaries' Inadequate Access to Care

DHCS was unable to offer a definitive explanation as to why Anthem and Health & Wellness could not provide their beneficiaries with better access to care. Managers at DHCS responsible for overseeing the approval of health plans' alternative access standard requests identified three potential causes of the excessive distances some beneficiaries may be required to travel: a lack of available providers, providers that contract with only one health plan rather than multiple plans, and providers that are unwilling to accept the payment rates that the health plans offered. Our analysis showed that a significant number of providers in the Regional Model have not contracted with either Anthem or Health & Wellness. However, we could not determine whether doing so would have improved beneficiaries' access to care because the data we evaluated did not identify the noncontracting providers' potential Medi-Cal specialties or all of the locations where they provide care. Nevertheless, our findings support the explanation that many providers contracting with only one of the two Regional Model health plans likely contributed to poor access. Additional analysis is necessary to determine whether a lack of providers in specific geographic areas of the Regional Model or their unwillingness to accept offered payment rates has contributed to the access issues.

When we analyzed licensing data from the Medical Board of California and the Osteopathic Medical Board of California—two entities responsible for licensing doctors in the State who participate in Medi-Cal—and provider network data from the health plans, we found that Anthem and Health & Wellness contracted with more than 3,900 providers located in the Regional Model counties. However, more than 1,900 additional providers in the Regional Model counties had not contracted with either health plan to provide services within these counties. It is unclear whether the two health plans contracting with these providers would improve beneficiaries' access to care. For example, some of these 1,900 providers may be located near beneficiaries who do not experience challenges with limited access.

We believe that DHCS would benefit from knowing the locations within the Regional Model counties that require additional providers and the types of providers required in those areas. If it had such knowledge, DHCS could determine the extent to which a lack of providers is causing some beneficiaries' poor access to care, and it could also develop the appropriate strategies to

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Some beneficiaries in the Regional Model would have significantly better access to care if they were able to seek it from the provider networks of both health plans.

alleviate those provider shortages. DHCS indicated that it would be willing to assist in an analysis of this nature, but that other state departments—such as the Office of Statewide Health Planning and Development—would be better suited to address workforce shortages among providers. Nonetheless, given DHCS’ critical role in overseeing the State’s provision of Medi-Cal services, we believe that it is well positioned to oversee such an analysis.

Our findings related to providers who contract with only one of the two plans are more straightforward. According to the data that the two health plans reported to DHCS in December 2018, fewer than 29 percent of the providers that contracted with either Anthem or Health & Wellness contracted with both health plans concurrently. Our analysis shows that some beneficiaries in the Regional Model would have significantly better access to care if they were able to seek it from the provider networks of both health plans. To evaluate how beneficiaries’ access to care would change if they had access to both networks, we reviewed DHCS’ data related to the health plans’ adherence to the time and distance requirements specified in state law. During its first annual network certification, DHCS identified more than 700 instances in which one or both Regional Model plans failed to meet these access requirements.⁵ However, if the Regional Model’s beneficiaries had access to both health plans’ provider networks, we estimate that this number would decrease to about 125, the number of instances in which both plans failed to meet the same access requirements in the same locations.

This difference reinforces our conclusion that DHCS could improve beneficiaries’ access to care if it required plans to authorize out-of-network care when they do not demonstrate that they have exhausted all of their reasonable options to contract with providers that meet the state requirements and when DHCS determines that significantly closer providers of the needed care are available. The difference also underscores the supposition that the providers’ tendency to contract with only one of the two Regional Model health plans has contributed to some beneficiaries’ poor access to care. The geographic distribution of providers in rural areas already makes it difficult for health plans to provide adequate access to care; when providers do not contract with multiple plans, it can further compound this difficulty.

⁵ We excluded OB/GYN primary care from this analysis because DHCS informed us that it exempted Anthem from the access requirement for OB/GYN primary care. As a result, DHCS does not have sufficient data for us to conclude how often both Regional Model plans are meeting the access requirement for OB/GYN primary care.

Given that Partnership operates in comparably remote areas of the State, its ability to provide significantly better access to care than the Regional Model plans suggests that beneficiaries in rural counties may receive better access to care when those counties operate under a single health plan rather than multiple plans. As part of DHCS' annual network certification, Partnership requested alternative access standards for 11 of the 39 types of providers that DHCS measures. In comparison, Health & Wellness and Anthem requested alternative access standards for 35 and 37 of the 39 provider types, respectively. Unlike the Regional Model, the structure of a COHS—such as Partnership—allows only one health plan in each county, meaning beneficiaries in COHS Model counties all have access to the same providers. We believe that this feature of the COHS Model may have contributed to Partnership's ability to provide better access to care in some rural areas of the State. We discuss the benefits of the COHS Model in greater detail in Chapter 2.

Increasing beneficiaries' access to providers currently outside of their networks could require some beneficiaries to schedule appointments farther in advance. However, the reduction in the distances the beneficiaries would have to travel might well outweigh this additional effort. As we mention in the Introduction, state law requires most health plans to ensure that their providers offer appointments within a specific number of days of the request for services. According to DHCS, if more Medi-Cal providers were to provide care to beneficiaries in both health plans, it might strain some providers' capacities and reduce their ability to meet this requirement. However, state law permits providers to extend the waiting time for appointments if they determine that waiting longer would not negatively affect the health of the beneficiaries involved. This exception could permit beneficiaries to make individual choices that are both safe and potentially more convenient. We believe that in certain circumstances beneficiaries might be willing to schedule appointments farther in advance if doing so would shorten how far they would have to travel. For example, the parent of a child with a heart condition requiring routine cardiology appointments might be willing to schedule those appointments farther in advance to avoid having to drive an additional 70 miles each direction.

Given Partnership's ability to provide its beneficiaries with better access to care and the apparent tendency of providers to contract with either but not both of the Regional Model health plans, we question whether having two separate health plans best serves the Regional Model counties. Conducting an assessment to identify the locations within the Regional Model that need additional providers and the types of providers necessary could offer DHCS

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In 2016 DHCS commissioned an access assessment that may assist it in identifying and resolving shortages of providers in the Regional Model.

valuable perspective on whether access issues in the Regional Model are the result of provider shortages, the structure of the model, or both.

In 2016 DHCS commissioned an access assessment that may assist it in identifying and resolving shortages of providers in the Regional Model. DHCS commissioned the assessment in response to federal requirements issued in 2015. According to documentation provided by DHCS, the completed assessment will include maps comparing the number of providers for each specialty and each health plan with the number of beneficiaries. The assessment will also identify the percentage of available providers for each specialty that each health plan is contracting with, the average distance between beneficiaries and each health plan's closest primary care physicians and hospitals, and recommendations for addressing systemic deficiencies it identifies. DHCS plans to finalize the assessment in October 2019. This assessment should enhance DHCS' knowledge of the locations throughout the State, including those in the Regional Model counties, that are lacking certain types of providers.

Regional Model Health Plans Have Not Provided an Acceptable Quality of Care to Beneficiaries

Although most health plans in the State have not met some of their contractual requirements related to quality of care, the health plans that serve the 28 rural expansion counties have consistently delivered a lower quality of care to beneficiaries than the health plans delivering services to beneficiaries in other areas of the State. Further, Managed Health Care's audits of the rural expansion counties suggest that the Regional Model health plans have had more difficulty than Partnership in meeting their contractual requirements related to quality of care.

Our review of HEDIS data from 2015 through 2018 found that the Regional Model health plans failed to meet a significant number of minimum performance levels. As the Introduction explains, DHCS requires health plans to meet minimum performance levels for key HEDIS measures related to the quality of care that they provide to beneficiaries. However, both Anthem and Health & Wellness scored below minimum performance levels for at least 24 percent of these HEDIS measures for each of the four years for which the data were available. For instance, neither of the two plans conducted an adequate number of breast cancer screenings in 2018. As Table 3 shows, the two Regional Model plans scored extremely poorly in 2016: Anthem and Health & Wellness failed to meet an average of 12 and 14, respectively, of the 22 minimum performance levels. To supplement these figures on the number of HEDIS measures below the minimum performance level, we present an interactive

map on our website that shows by county, plan, and measure the percent of HEDIS scores below the minimum performance levels during the past four years.

Table 3
The Regional Model Health Plans and Partnership Have Provided a Similar Quality of Care in the Rural Expansion Counties

YEAR	NUMBER OF MEASURES*	AVERAGE NUMBER OF HEDIS MEASURES BELOW MINIMUM PERFORMANCE LEVEL		
		REGIONAL MODEL†		COHS
		ANTHEM	HEALTH & WELLNESS	PARTNERSHIP‡
2015	22	9.5	10.5	10.5
2016	22	12	14	11
2017	18	6.5	7.5	8
2018	21	5	6	6

Source: Analysis of HEDIS data.

Note: Anthem, Health & Wellness, and Partnership report on their performance using reporting units made up of groups of counties. We averaged their scores in each of their rural expansion county reporting units to determine their overall performance in the rural expansion counties.

* Excludes measures for which DHCS has not specified a minimum performance level.

† Excludes Kaiser Permanente, which operates in a limited manner in three of the 18 Regional Model counties.

‡ Excludes Lake County, which is part of the rural expansion. Partnership reports Lake County's data as part of a group of counties that includes three counties that were not in the rural expansion.

The HEDIS data indicate that although the quality of care the Regional Model health plans provided was comparable to the quality of care in the other rural expansion counties, it was lower than the quality of care in the rest of the State. As Table 3 shows, the performance of Anthem and Health & Wellness within the 18 Regional Model counties was similar to Partnership's performance in its rural expansion counties. However, Table 4 shows that the rural expansion health plans' average performance was well below the average performance of the plans serving the counties in the rest of the State. Improvements in the HEDIS scores of the Regional Model plans since 2016 have reduced the gap between the Regional Model counties and other areas of the State. According to the quality and monitoring chief, the improvements in these health plans' HEDIS scores indicate that their quality of care has improved as a result of a CAP—which it refers to as a *quality CAP*—that it imposed when they fell below standards.

Table 4
Beneficiaries in the Rural Expansion Counties Have Received a Lower Quality of Care Than Other Beneficiaries in the State

YEAR	NUMBER OF MEASURES*	AVERAGE NUMBER OF HEDIS MEASURES BELOW MINIMUM PERFORMANCE LEVEL	
		RURAL EXPANSION†	REMAINDER OF THE STATE‡
2015	22	10.2	4.1
2016	22	12.3	6.7
2017	18	7.3	4.7
2018	21	5.7	2.3

Source: Analysis of HEDIS data.

* Excludes measures for which DHCS has not specified a minimum performance level.

† Excludes Kaiser Permanente, which operates in a limited manner in three of the 18 Regional Model counties. Also excludes Imperial and San Benito counties, which Anthem and Health & Wellness serve outside the Regional Model.

‡ Includes Lake County, which is part of the rural expansion. Partnership reports Lake County's data as part of a group of counties that includes three counties that were not in the rural expansion.

Other measures suggest that the Regional Model plans have struggled more than Partnership in meeting their contractual requirements for quality of care. As we discuss in the Introduction, both DHCS and Managed Health Care perform routine audits to verify whether health plans are complying with legal and contractual requirements that affect quality of care. However, these audits generally cover each plan's performance throughout the State, without indicating the particular model or county with which the departments have identified deficiencies. Consequently, the audits do not address conditions that are specific to the Regional Model plans. Nonetheless, under the terms of an interagency agreement between DHCS and Managed Health Care for 2014 through 2016, Managed Health Care conducted an audit of each of the three health plans—Anthem, Health & Wellness, and Partnership—that focused on their legal and contractual compliance within the 28 rural expansion counties. These audits suggest that the Regional Model health plans had greater difficulty meeting their contractual requirements than Partnership did.

Managed Health Care identified contractual and legal violations that all three health plans committed in the rural expansion counties, but it identified potentially more serious deficiencies in its reviews of Anthem and Health & Wellness than of Partnership. For example, Managed Health Care determined that both Anthem and Health & Wellness failed to properly document and address potentially significant grievances and other quality issues pertaining to inadequate care, including a cardiac arrest caused by a medication error and a provider's failure to detect a serious infection. The health plans' failure to properly address these

reported quality issues may have exposed beneficiaries to harm. In contrast, Managed Health Care's findings related to Partnership did not indicate significant risks to beneficiaries' health. For example, Managed Health Care found that Partnership resolved grievances promptly but did not always list the dates it received the grievances when responding to beneficiaries.

DHCS has taken steps to ensure that the health plans have resolved the deficiencies that Managed Health Care's audits identified. As part of its interagency agreement, DHCS used quality CAPs to address these violations. In our April 2019 audit report, *Department of Health Care Services: Although Its Oversight of Managed Care Health Plans Is Generally Sufficient, It Needs to Ensure That Their Administrative Expenses Are Reasonable and Necessary*, Report 2018-115, we determined that DHCS' process to oversee health plans' quality of care—including quality CAPs—was generally sufficient.

DHCS Has Not Effectively Communicated to Counties When It Identified Quality of Care Deficiencies

Although DHCS has generally complied with state and federal reporting requirements, it could do more to inform county officials when it identifies significant quality of care issues with the Regional Model health plans. Federal and state laws require DHCS to publicly report different elements of its monitoring efforts, and DHCS complies with these requirements by publishing its HEDIS results and medical audit reports on its website. However, it has not adequately educated counties about all the types of monitoring that it performs, such as the medical audits we previously discuss and the corresponding CAPs, which DHCS calls *medical audit CAPs*. Through its medical audits, DHCS evaluates health plans' performance and compliance with contractual requirements in six categories: utilization management, case management and coordination of care, access and availability of care, member rights, quality management, and administrative and organizational capacity. If stakeholders are not aware of DHCS' monitoring efforts, they are unlikely to seek out the results of those efforts. Moreover, when it completes its audit reports, DHCS does not notify counties or distribute the reports to them, thereby placing the responsibility on the counties to review its website regularly to become aware of new medical audit findings.

Further, DHCS does not promptly update its website with its medical audit reports, which delays stakeholders' ability to review those results. For example, DHCS issued its most recent audit of Anthem in August 2018; however, it still had not made the results publicly available as of July 2019. DHCS explained that it waits

DHCS has not adequately educated counties about all the types of monitoring that it performs, such as its medical audits.

By providing counties with information about the significant quality of care issues that it identifies, DHCS could better enable them to help beneficiaries receive the care to which they are entitled.

until the health plans complete the medical audit CAPs pertaining to their audits before it publishes the audit results on its website. Although state law allows this delay, counties could better assist their beneficiaries if DHCS informed them of performance issues more promptly. We believe that DHCS should publish medical audit results as they become available and then post the completed medical audit CAPs later. DHCS said it would consider making this change.

By providing counties with information about the significant quality of care issues that it identifies, DHCS could better enable them to help beneficiaries receive the care to which they are entitled. County representatives indicated that they were aware of beneficiaries' difficulties with receiving appropriate care, and that in some cases, beneficiaries have reached out to them directly to report issues. Information about problems that DHCS has identified with health plans' performance would likely assist counties in their efforts to help these beneficiaries, particularly when DHCS has identified violations of beneficiaries' rights. For example, DHCS concluded in a 2017 audit that Health & Wellness had wrongfully denied a beneficiary an evaluation to determine whether he was eligible for an organ transplant, even though a physician recommended an evaluation and the health plan's contract with DHCS entitled its beneficiaries to such evaluations. If DHCS consistently informed counties of such problems, the counties would be better positioned to assist other beneficiaries who are facing similar issues.

To obtain the counties' perspectives on DHCS' outreach efforts, we spoke with representatives of county health agencies in a number of rural expansion counties. Representatives of seven of these counties were unfamiliar with the full scope of DHCS' monitoring efforts, and representatives of five stated that they did not even know that DHCS conducted medical audits. In general, most of these individuals who we spoke with stated that they would like DHCS to be more proactive in notifying them when it identifies serious deficiencies in their county's health plans.

The representatives' comments suggest that counties would benefit if DHCS issued a periodic form of communication, such as a newsletter. In fact, one county representative described DHCS' website as overwhelming, and another said that it is difficult to find the reports about health plans' performance levels on that website. Another county official explained that her staff lack the time to review the website regularly to determine whether DHCS has published new reports. When we asked DHCS for perspective, it explained that counties and other stakeholders can request to be added to an email distribution list (mailing list) it uses to update stakeholders on managed care topics. It also stated that it has

two advisory groups in which counties may participate, and each of these groups has an email address to which stakeholders can submit questions or concerns. However, DHCS acknowledged that it does not discuss its medical audits and other monitoring efforts in these groups unless a member requests that it do so, nor does it send such information to stakeholders on its mailing list. By improving its process for publishing its monitoring results, which it is willing to do, DHCS could better ensure that county stakeholders have the knowledge necessary to assist beneficiaries in receiving the care that they need.

Recommendations

To ensure that beneficiaries in Regional Model counties have adequate access to care, DHCS should identify by August 2020 the locations requiring additional providers and the types of providers required. It should also develop strategies for recruiting and retaining providers in those locations. If it requires additional funding to complete this assessment or to implement actions to address its findings, DHCS should determine the amounts it needs and request that funding from the Legislature.

To obtain assurance that health plans throughout the State exhaust all of their reasonable options to meet the access requirements before requesting alternative access standards, DHCS should immediately begin doing the following:

- Develop written guidance that specifies the conditions under which staff should approve, deny, or contact health plans for clarification regarding their alternative access standard requests.
- Determine a specific minimum number of providers that health plans must attempt to contract with before requesting an alternative access standard.
- Require health plans to report on their attempts to contract with providers when submitting their alternative access standard requests, including providing evidence of their efforts, such as the contact information for each provider with which they have attempted to contract.
- Establish a process for periodically verifying the health plans' efforts, such as contacting a sample of the listed providers and determining whether the plans attempted to contract with them.
- Require health plans to authorize out-of-network care if they do not demonstrate they have exhausted all of their reasonable options to meet the access requirements, unless the health

plans can demonstrate that closer providers are demanding unreasonably high rates or have documented deficiencies in quality of care.

To ensure that it promptly and sufficiently notifies counties and other stakeholders about health plans' quality of care deficiencies, DHCS should immediately do the following:

- Post its medical audit reports to its website within one month after it issues the reports to the health plans.
- Include information about its recently published medical audit reports and other monitoring efforts in its communication with counties and other stakeholders on its mailing list.
- Ensure that relevant county officials are included on its mailing list.

Chapter 2

DHCS HAS NOT ENSURED THAT ALL MEDI-CAL BENEFICIARIES IN RURAL EXPANSION COUNTIES RECEIVE SERVICES THROUGH A MODEL THAT BEST MEETS THEIR NEEDS

Chapter Summary

Over the course of the past seven years, DHCS has not adequately engaged with the Regional Model counties regarding their managed care model and contracted health plans. Specifically, before the 2013 transition, DHCS did not actively educate the rural expansion counties about the options available to them. Further, even when these counties sought to create or join a COHS, it did not assist them. DHCS' lack of engagement with the counties continued well after the transition occurred. For example, it did not seek feedback from the Regional Model counties regarding their satisfaction with Health & Wellness's performance before it extended its contract with the health plan.

However, DHCS could now take steps to begin acting on counties' preferences and feedback. Since the completion of the rural expansion in 2013, a number of counties have expressed the desire to leave the Regional Model and instead create or join a COHS. DHCS' current agreements with the Regional Model health plans make such a change difficult until 2023, but at that time, transitioning Regional Model counties to a COHS will be a viable option. Because creating a COHS would require the counties and DHCS to complete several time-consuming activities, such as establishing a provider network, starting the process now would better enable the counties and DHCS to complete these activities before the current health plan contracts expire and ensure continuity of care for the counties' beneficiaries. By assisting the counties in making such a change, DHCS could better ensure that beneficiaries receive adequate access to care.

DHCS Did Not Adequately Educate and Assist Rural Expansion Counties During Their Transition to Managed Care

As the agency responsible for overseeing the effective delivery of health care to Medi-Cal beneficiaries throughout the State, DHCS should have ensured that before the rural expansion counties transitioned to managed care, it proactively educated them on the available managed care options so that they could select a model that would best serve their needs. Instead, the counties selected their own models without receiving sufficient guidance

from DHCS. Several county representatives we interviewed stated that they were unclear about their managed care options at the time of the rural expansion transition. In addition, even when counties determined that they wanted to join or create a COHS, DHCS did not assist them in exploring that option.

DHCS Did Not Adequately Inform and Educate Rural Expansion Counties on Their Managed Care Options

DHCS did not actively collaborate with the rural expansion counties before their transition to managed care to inform them of their options, to identify any potential concerns they should consider, or to confirm that they understood the transition process. According to the special projects manager of the DHCS director's office (special projects manager), who formerly served as the managed care chief, DHCS representatives had several conversations with county representatives and providers, such as hospitals, that approached it with questions about managed care. For example, some counties asked DHCS about joining Partnership, and DHCS informed them of the steps they would need to take, including seeking federal approval. Nevertheless, because DHCS relied on the counties to select their own models, we expected it to have provided them with adequate information to ensure that they made informed decisions. That type of involvement likely would have helped ensure the overall success of the transition.

State law required DHCS to solicit feedback from relevant managed care stakeholders such as beneficiaries, providers, and health plans regarding their perspectives on the models that would be most suitable for the 28 rural expansion counties. During the rural expansion, DHCS held open meetings to solicit feedback from stakeholders, but it did not conduct outreach that specifically targeted the counties. Because counties are able to create COHS Models and local initiatives in a Two-Plan Model, we expected DHCS to have considered them relevant stakeholders and to have sought their feedback. However, DHCS' meetings did not address topics of specific relevance to counties, such as the steps a county would need to take to create a COHS Model. According to the special projects manager, DHCS believes it addressed its responsibility to inform stakeholders, including counties, about the rural expansion transition by facilitating these meetings and by being willing to address concerns stakeholders brought to its attention.

However, we question the effectiveness of this approach given that many counties told us they were unclear about their managed care options at the time of the transition. Representatives from several Regional Model counties stated that their counties had

Because counties are able to create COHS Models and local initiatives in a Two-Plan Model, we expected DHCS to have considered them relevant stakeholders and to have sought their feedback.

not fully understood the options that were available to them, the type of assistance DHCS was willing to provide them, or the steps they needed to take to establish or join a managed care model. Consequently, those counties did not take specific action to join or create another model and instead deferred to DHCS, which placed them in the Regional Model.

Neither DHCS' chief deputy director—who was not involved in communications with the counties during the time of the rural expansion—nor its special projects manager could recall whether DHCS actively approached and educated the rural expansion counties beyond the transition meetings that it held for interested stakeholders. However, the special projects manager acknowledged that DHCS did not prepare informational material for stakeholders to explain the available managed care options, the steps the counties would need to take to act on those options, or the resources DHCS could offer to assist with the transition. Further, neither the chief deputy director nor the special projects manager recalled whether DHCS advised the counties on how to evaluate their demographics to determine whether particular models might be more effective in serving their beneficiaries. They also could not recall whether DHCS allocated staff resources, such as an assigned group of staff members, to monitor the progress of the counties during the transition and to serve as a resource for them. We expected DHCS to have taken some or all of these actions to ensure that the counties were well informed to select their own managed care models.

DHCS Did Not Assist Rural Expansion Counties That Wanted to Create or Join a COHS

Despite the questionable effectiveness of DHCS' approach to inform counties of their managed care model options, many of the rural expansion counties attempted to create or join a COHS or local initiative, as we discuss in the Introduction. However, four of the Regional Model counties were unsuccessful in their attempts. Three of these four counties informed us that they attempted to join Partnership by discussing with Partnership representatives the viability of having that health plan serve their Medi-Cal beneficiaries. One county indicated that it also passed a county board resolution affirming its support of Partnership's expansion into the county. Representatives of the three counties explained that Partnership ultimately rejected the counties' proposals because it had reached its capacity of additional counties it could accept. The other county attempted to join another COHS, the Central California Alliance for Health (Central Alliance). According to a

Several counties had not fully understood the options that were available to them, the type of assistance DHCS was willing to provide them, or the steps they needed to take to establish or join a managed care model.

Most of the eight rural expansion counties that successfully joined Partnership in 2013 received assistance from an external resource, which better prepared them to join a COHS.

county representative, Central Alliance indicated that it would not be able to accept the county because it would have been financially prohibitive for it to do so.

Most of the eight rural expansion counties that successfully joined Partnership in 2013 received assistance from an external resource, which better prepared them to join a COHS. Several of these counties participated in stakeholder meetings facilitated by Health Alliance of Northern California (Health Alliance), a network of nonprofit community health clinics and health centers. The meetings informed these counties about their managed care model options, including the locations of the current COHS they could seek to join. Health Alliance recruited Partnership to attend the meetings. A Health Alliance representative informed us that Health Alliance also coordinated with the counties to obtain declarations from their boards of supervisors that demonstrated their desire to receive Medi-Cal services through Partnership. At least two counties then contacted their respective state legislators, who encouraged DHCS to allow the counties to join Partnership. DHCS subsequently approved these counties' requests to join Partnership.

DHCS did not provide the type of assistance that Health Alliance provided because it did not believe that doing so was part of its role. According to the chief deputy director, DHCS expected counties that were interested in joining a COHS to reach out directly to that COHS to determine whether it was interested in providing services in the county. Further, the special projects manager explained that the COHS would have needed to consider whether it was able to establish or expand its provider network into the counties. In other words, because DHCS believed that the counties and health plans should have taken the initiative to work together, it did not attempt to facilitate or encourage any communication among them. However, we expected DHCS—like Health Alliance—to have provided assistance to the counties to ensure that they were well positioned to work with the health plans to provide the best service to their beneficiaries.

In addition, if DHCS had made information about the transition available to counties sooner, more counties might have been able to select the health plans they determined would best serve their beneficiaries. A representative from one of the Regional Model counties told us that her county became interested in joining Partnership too late in the managed care transition process, after Partnership already reached its capacity. By that time, the county was not able to create its own COHS or establish a multicounty COHS with other counties. According to DHCS' records, it held its first stakeholder meeting to inform Regional Model counties of the transition to managed care in July 2012—only seven months before it awarded the contracts to Anthem and

Health & Wellness in February 2013. We question the sufficiency of this seven-month period to allow counties to explore the option of joining a health plan or creating an alternate managed care model, especially without informational assistance from DHCS.

Because DHCS is the entity responsible for administering the Medi-Cal program, we believe that it was in the best position to provide assistance to counties that wanted to create a COHS. We expected DHCS to have informed the counties about the specific actions required to create a COHS and to provide assistance to those counties that did not have the resources to perform such actions. For example, two Regional Model counties told us they did not explore the option of creating a COHS at the time of the transition because they believed they did not have the necessary financial resources or knowledge. Had DHCS been proactive in offering assistance, the counties might now have managed care models that are more effective at providing services to their beneficiaries.

The chief deputy director explained that providing such assistance to counties would not have been possible in 2013 because DHCS did not have sufficient financial resources at that time. She also stated that if DHCS were to take on the responsibility of providing financial assistance to counties that want to be in a different managed care model, it would need additional funding from the State. We discuss this possibility in more detail below.

DHCS Extended Its Contracts With the Regional Model Health Plans Without Seeking Input From the Counties

State law allows DHCS to enter into contracts with one or more health plans to provide managed health care services to Medi-Cal beneficiaries in the rural expansion counties. In addition, DHCS has the exclusive authority to establish rates, terms, and conditions of managed care plan contracts and subsequent amendments, although these elements are subject to federal approval. Although state law required DHCS to request stakeholder feedback as part of the rural expansion counties' transition to managed care in 2013, it does not require DHCS to request feedback from stakeholders, including counties, before extending its contracts with the Regional Model health plans. However, we believe that before taking such an action, DHCS should request the counties' feedback. Otherwise, it may miss opportunities to gain important insight from the counties on whether the health plans have been effectively serving beneficiaries.

In 2013 DHCS established five-year contracts with Anthem and Health & Wellness to provide services in the Regional Model counties through October 2018. In November 2018, DHCS

DHCS has the exclusive authority to establish rates, terms, and conditions of managed care plan contracts and subsequent amendments, although these elements are subject to federal approval.

Although DHCS does not have a formal internal review process for determining whether to extend a contract, it stated that it considers health plans' performance when deciding whether to extend their contracts and would not do so if it identified significant issues.

extended its contract with Health & Wellness through a provision that allowed it the option to extend the terms in one-year increments up to four additional years. DHCS initially exercised the option to extend the contract through June 2019 and extended it again through June 2020 without seeking feedback from counties about their satisfaction with the health plan's performance. According to the managed care chief, DHCS extended the contract because of this provision and because it did not identify any concerns with Health & Wellness that warranted terminating that contract.

Although DHCS does not have a formal internal review process for determining whether to extend a contract, it stated that it considers health plans' performance when deciding whether to extend their contracts and would not do so if it identified significant issues. DHCS asserted that it continually monitors health plans' performance through various methods, including but not limited to its medical audits and its review of HEDIS measures. DHCS also stated that it did not request stakeholder feedback before extending the contract, citing the absence of such a requirement and the fact that DHCS had received feedback from stakeholders when it first solicited proposals for the rural expansion counties in 2012. However, we question the timeliness and relevance of that feedback, given that it occurred before DHCS had even entered into a contract with Health & Wellness. We expected that each time DHCS extended Health & Wellness' contract, it would request feedback from stakeholders, including counties, to gain insight regarding the health plan's performance and the counties' desire to continue in the Regional Model.

DHCS also extended Anthem's contract without seeking feedback from stakeholders although it did so under other unique circumstances for which feedback would not have been relevant. In 2014 just one year after executing the original contract, DHCS agreed to a settlement with Anthem that extended its contracts for five additional years in all of the counties in which Anthem provided Medi-Cal services, including the Regional Model counties. According to DHCS, the settlement was the result of several lawsuits Anthem filed against DHCS regarding rates that DHCS paid it to provide Medi-Cal services. Because of the settlement, the Regional Model counties are obligated to remain in that model and have Anthem serve as one of their health plans through October 2023.

Nevertheless, it appears that DHCS did not inform counties of this extension until long after it was executed. DHCS' current management were unclear about the extent of any discussions that their predecessors had with counties before extending the contract. However, according to representatives of several Regional Model

counties, DHCS did not inform them of the extension at the time it occurred. Some of these representatives informed us that they had multiple meetings with DHCS' executive staff in 2017 and early 2018 to discuss the managed care model options that were available to them after DHCS' contracts with Anthem and Health & Wellness expired. According to some of these counties, DHCS informed them during those meetings that it had extended Anthem's contract through 2023 and that it would not be able to remove them from that contract because it would incur significant financial penalties.

DHCS announced on its website that it will initiate a new request for proposals (RFP) that it anticipates releasing in 2020 for commercial managed care health plans throughout the State that include the Regional Model counties. It plans to place all of its commercial managed care health plan contracts up for bid in 2020, including Anthem's and Health & Wellness's Regional Model contracts. According to the chief deputy director, if the Regional Model counties want to join or create a COHS, they will need to begin working on the transition while DHCS' contracts with Anthem and Health & Wellness are still in place, and they will need to inform DHCS before it issues the RFP. DHCS also identified January 2024 as the potential implementation date for the Regional Model contracts. However, that implementation date is subject to change, based on the health plans' ability to provide services. According to DHCS, the four-year period for implementation is based on the amount of time needed for it to evaluate and score proposals and to ensure that the selected health plans complete all required plan readiness activities. Although DHCS indicated it is not requesting feedback from stakeholders on this RFP because the stakeholders in those affected counties already have experience with managed care, it is willing to accept any public comments it receives after it issues the request.

The COHS Model Is a Viable Option for the Regional Model Counties That Could Ensure That Its Beneficiaries Receive Better Access to Care

As we discuss in Chapter 1, the majority of the providers that contract with the Regional Model health plans contract with only one of the health plans but not both. Because the COHS Model consists of a single health plan that a county directly oversees, its structure might facilitate better access to care for Regional Model beneficiaries because they could access all of its contracted providers. With the assistance of DHCS, many Regional Model counties could establish a multicounty COHS that likely would more effectively serve their beneficiaries. However, any formal change could likely not occur until the contracts with the two existing Regional Model health plans expire.

DHCS announced on its website that it will initiate a new RFP that it anticipates releasing in 2020 for commercial managed care health plans throughout the State that include the Regional Model counties.

The COHS Model May Provide Better Access to Care for the Beneficiaries in the Regional Model Counties

As we discuss in Chapter 1, the Regional Model's use of two health plans that must each establish adequate provider networks has negatively affected beneficiaries' access to care. The majority of providers in the Regional Model contract with either of the Regional Model health plans but not both, meaning that some beneficiaries may have to travel hundreds of miles to receive care from in-network providers. In contrast, one of the defining characteristics of the COHS Model is that it consists of a single health plan that provides services to its beneficiaries. By implementing a COHS in the Regional Model counties, all of the beneficiaries in those counties would have access to all of the providers in that model. DHCS indicated that it is not aware of any evaluation that has concluded that a particular managed care model is more effective at providing access to care than another model. However, the poor access conditions we identified in the Regional Model counties led us to conclude that DHCS could benefit from performing such an evaluation to determine whether a COHS would improve access to care for those beneficiaries.

A COHS can dedicate a greater portion of its financial resources to recruiting Medi-Cal providers to rural locations in which it operates that do not currently have such providers.

A COHS also can dedicate a greater portion of its financial resources to recruiting Medi-Cal providers to rural locations in which it operates that do not currently have enough such providers. A COHS is a nonprofit organization with a governing board that is largely composed of officials of the counties they serve. Because of its nonprofit status, a COHS does not dedicate a portion of the capitation payments it receives to corporate shareholders in the same way that Anthem and Health & Wellness do. Consequently, a COHS could have more flexibility than a commercial health plan to commit its resources to improving provider availability.

Additionally, because a COHS's board is composed largely of officials of the counties that it serves, these county officials have influence in directing the organization to dedicate its resources to their counties' greatest needs, including recruiting providers. According to Partnership, its board directed the organization to prioritize recruiting for providers to fill service gaps in its counties. Partnership asserts it has since committed significant resources to recruiting new providers for those counties and retaining existing providers.

Establishing a COHS Is a Viable Option for the Regional Model Counties

Since the completion of the rural expansion transition in 2013, at least seven counties have expressed to DHCS their interest in either switching to a COHS Model or in learning more about doing so.

We spoke with representatives of these and other counties in the Regional Model about their experiences with the rural expansion transition, their current service delivery, and their perspectives on their future involvement with managed care. Several counties identified potential benefits of the COHS Model that they do not have in the Regional Model. For example, representatives from some counties believe that the direct county oversight of a COHS can lead to the health plan's implementation of programs that address the counties' specific needs. When we spoke to Partnership, it explained that it has implemented programs to assist with the opioid epidemic in response to concerns from its counties.

DHCS' settlement with Anthem and its contract with Health & Wellness would likely preclude the counties from considering other models until those contracts expire in 2023 and 2020, respectively. Thereafter, the Regional Model counties could consider creating or joining a COHS. Federal regulations generally require that states mandating that Medicaid beneficiaries must enroll in a managed care health plan must give those beneficiaries a choice of at least two plans. However, federal regulations allow an exception for COHS Models if the COHS offers its beneficiaries a choice of at least two primary care providers.

To create a COHS that would serve multiple counties in the Regional Model, those counties would need to establish the COHS's administrative structure and provider network. For example, the counties would need to create a special commission to negotiate the contract and arrange for the provision of health care services. The counties would also need to hire personnel, procure computer systems, and establish contracts with providers, which all have associated costs. Because DHCS cannot issue health plan capitation payments until a COHS begins serving Medi-Cal beneficiaries, the COHS would not have those resources available to fund its start-up costs. Given that some of the Regional Model counties may not have sufficient staff or financial resources to fund the start-up costs of a COHS, it would seem reasonable for DHCS to provide assistance to the counties to help create the entity and hire core personnel. Further, for this same reason, it may be more cost-effective for the Regional Model counties to create a multicounty COHS for the region rather than one or more of them creating a county-specific COHS.

Although DHCS has yet to provide any such assistance to counties that currently desire to create a COHS, the chief deputy director stated that DHCS would need additional funding before it could provide assistance to counties. Similarly, DHCS indicated it does not provide financial resources to new health plans for start-up costs and would need to seek funding from the Legislature to do so.

To create a COHS that would serve multiple counties in the Regional Model, those counties would need to establish the COHS's administrative structure and provider network.

However, without DHCS' assistance, small and rural counties may not be able to develop the infrastructure required to change their managed care models.

Because DHCS' current staff do not have experience with establishing a COHS, we interviewed a representative of the State's most recently established COHS, Gold Coast Health Plan (Gold Coast), about the process Ventura County used to establish it in 2011. According to the representative, the formation of Gold Coast required Ventura County to hire staff to administer the health plan. Gold Coast then contracted with external vendors to perform some of its administrative functions, such as operating its claims and encounter data computer systems. Gold Coast obtained a portion of its start-up funding from one of its vendors. Gold Coast estimated that creating and staffing the COHS cost about \$15 million.

In addition, before the Regional Model counties could begin operating a new COHS, both federal regulations and state law require DHCS to evaluate whether the COHS is adequately prepared to provide services to beneficiaries. That evaluation would entail reviewing the health plan's provider network and its procedures to monitor and improve quality of care.

The Cost to Deliver Managed Care Depends on the Specific Needs of the Beneficiary Population Being Served

To evaluate whether the costs of delivering Medi-Cal services using a COHS in the Regional Model counties would differ from the current costs of delivering those services, we reviewed DHCS' capitation payments and other associated costs for Partnership counties and for the Regional Model counties. DHCS pays monthly capitation payments to health plans to cover services that DHCS has contractually required the health plans to provide to beneficiaries. DHCS groups eligible beneficiaries into 10 aid categories, each of which consists of individuals who have similar health risk traits. It then pays different capitation payments depending on the aid category. For example, DHCS would pay a different capitation payment for a beneficiary in the *breast and cervical cancer* aid category than for a beneficiary in the *family and adult* aid category. DHCS provides certain services to beneficiaries even though it does not require some health plans to include these services in their contracts. DHCS pays providers directly for these services, which we refer to as *noncapitated services*.

As Table 5 shows, DHCS spent more per beneficiary per month from fiscal years 2013–14 through 2016–17 to deliver services to Partnership's beneficiaries than to the Regional Model beneficiaries.

DHCS pays monthly capitation payments to health plans to cover services that DHCS has contractually required the health plans to provide to beneficiaries.

However, DHCS indicated that the overall average per-member per-month cost of providing services to Partnership beneficiaries is not a reasonable representation of how much it would cost DHCS to provide services to beneficiaries in the Regional Model counties through a COHS. The research and analytic studies chief (research chief) explained that the differences in the overall average per-member per-month cost for capitation payments between the Regional Model and Partnership was primarily driven by the variation in enrollment patterns between the model types during this period. The research chief stated that Partnership’s higher overall average per-member per-month cost is attributable to its counties having enrolled a greater proportion of beneficiaries in high aid categories than the Regional Model counties enrolled. For example, DHCS determined that in fiscal year 2013–14, about 13 percent of Partnership’s capitation payments were for beneficiaries in one of its disabled aid categories, while only 1 percent of the Regional Model counties’ payments were for such beneficiaries.

Table 5
DHCS Spent More per Member per Month for Partnership’s Beneficiaries Than for the Regional Model’s Beneficiaries

FISCAL YEAR	PAYMENT TYPE	MANAGED CARE MODEL TYPE	
		COHS (PARTNERSHIP)	REGIONAL MODEL
2013–14	Capitated	\$409	\$266
	Noncapitated*	231	88
	Totals	\$640	\$354
2014–15	Capitated	\$428	\$364
	Noncapitated*	195	113
	Totals	\$623	\$477
2015–16	Capitated	\$365	\$315
	Noncapitated*	201	129
	Totals	\$566	\$444
2016–17	Capitated	\$318	\$308
	Noncapitated*	210	141
	Totals	\$528	\$449

Source: Analysis of DHCS’ Medi-Cal expenditures from fiscal years 2013–14 through 2016–17.

Note: According to DHCS, neither capitation payments nor noncapitated services costs include certain supplemental payments, Medicare premiums, pharmacy rebates, or settlements.

* Noncapitated services are those that DHCS does not require health plans to provide to beneficiaries in their benefits packages. Instead, DHCS pays providers directly for the services when billed by the providers.

According to the research chief, another factor contributing to the difference between Partnership's costs and Regional Model health plans' costs is their beneficiaries' utilization of noncapitated services. For example, DHCS paid about \$27 more per member per month in fiscal year 2016–17 for Partnership's beneficiaries to receive in-home supportive services, which are noncapitated, than it did for the Regional Model beneficiaries. The research chief informed us that like capitation payments, costs relating to noncapitated services depend on the number of beneficiaries in a health plan who qualify to receive the services and the degree of assistance that each beneficiary needs. If a health plan has more beneficiaries that require noncapitated services, DHCS will pay a higher overall average per-member per-month cost for those beneficiaries. Consequently, the costs that DHCS incurs for health plans to deliver care to their beneficiaries is based on the specific needs of those beneficiaries whom the health plans serve.

Recommendations

To ensure that all counties are aware of the managed care model options available to them and of the steps necessary to implement those models, DHCS should provide by December 2019 information to all counties that clearly defines each managed care model and the steps and legal requirements needed to establish each model.

To ensure that it makes informed decisions regarding the extension or renewal of its contracts with managed care health plans, DHCS should immediately begin the practice of requesting annual feedback from the counties that the health plans serve and of using that feedback in its decision-making process.

To ensure that beneficiaries in the Regional Model counties have reasonable access to care, DHCS should do the following by June 2020:

- Determine the specific causes of Anthem's and Health & Wellness's inabilities to provide reasonable access to care in the Regional Model counties.
- Evaluate whether the structural characteristics of a COHS Model would be better suited to providing reasonable access to care in the Regional Model counties and notify the counties whether a COHS would improve beneficiaries' access to care. If some or all of these counties desire to transition to a COHS, DHCS should assist them in making that change after their current contracts expire.

- Evaluate whether it has the financial resources to provide assistance to counties interested in establishing a COHS or other managed care model after the current Regional Model contracts expire. If DHCS does not have the required financial resources, it should seek an appropriate amount of funding from the Legislature.
- Provide these counties with reasonable opportunities to decide whether to change their managed care models after the expiration of the Regional Model health plan contracts. DHCS should provide counties that choose to do so sufficient time to establish their new models. DHCS should also include language in its 2020 RFP to allow Regional Model counties that can demonstrate their ability to implement a COHS Model in their county by 2023 to opt out of the RFP process.

We conducted this audit under the authority vested in the California State Auditor by Government Code 8543 et seq. and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives specified in the Scope and Methodology section of the report. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Respectfully submitted,



ELAINE M. HOWLE, CPA
California State Auditor

Date: August 6, 2019

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Appendix

SCOPE AND METHODOLOGY

The Joint Legislative Audit Committee (Audit Committee) directed the California State Auditor to examine DHCS’ oversight of the rural expansion and of managed care in the Regional Model counties. Specifically, the Audit Committee directed us to identify the process DHCS used to create the Regional Model, determine whether the level of care health plans have provided the Regional Model’s beneficiaries has been acceptable, and identify factors that may prevent the Regional Model counties from establishing a COHS. The table below lists the objectives that the Audit Committee approved and the methods we used to address them.

Audit Objectives and the Methods Used to Address Them

AUDIT OBJECTIVE	METHOD
<p>1 Review and evaluate the laws, rules, and regulations significant to the audit objectives.</p>	<p>Reviewed relevant federal and state laws, rules, and regulations related to DHCS’ oversight of managed care, health plans’ acceptable delivery of managed care, and the establishment of a COHS.</p>
<p>2 Identify the process by which DHCS identified and grouped the 18 counties in question into the Regional Model and evaluate the reasonableness of the process.</p>	<ul style="list-style-type: none"> • Interviewed DHCS staff to identify the process it used to transition the 28 rural expansion counties, including the 18 Regional Model counties, to managed care. • Interviewed representatives of the rural expansion counties, including the Regional Model counties, to determine how their counties learned they would be transitioning from fee-for-service to managed care, what types of interactions they had with DHCS, and whether DHCS addressed any concerns or health plan preferences they had. • Evaluated any efforts DHCS made to communicate with counties regarding the managed care transition process. • Reviewed and evaluated the process DHCS used to group the 18 counties into the Regional Model and whether that process was reasonable.
<p>3 For the past three years, assess the rates of claims being paid by the Regional Model commercial plans and how they compare to Medi-Cal managed care plans offered through the COHS Model.</p>	<ul style="list-style-type: none"> • Evaluated available fiscal years 2015–16 through 2017–18 financial records for Anthem, Health & Wellness, and Partnership to determine the amounts they spent to provide services to their beneficiaries. • Interviewed DHCS staff to determine how it sets capitation rates. • Evaluated the differences between the benefit packages for the Regional Model and the COHS Model and the effect that the benefit packages had on the amounts DHCS paid those models’ health plans per beneficiary. • Evaluated Medi-Cal cost data from fiscal years 2013–14 through 2016–17 for all 18 Regional Model counties and eight Partnership counties to determine how much DHCS spent to deliver services to the beneficiaries of those counties.
<p>4 Determine how DHCS selected the Regional Model commercial plans, review the terms of any relevant agreements, and assess the degree to which DHCS considered stakeholder input or other relevant factors.</p>	<ul style="list-style-type: none"> • Interviewed DHCS staff to determine the process it used to select the Regional Model health plans. • Evaluated whether DHCS followed the applicable laws when it selected the Regional Model health plans. We determined that DHCS followed relevant laws when it selected Anthem and Health & Wellness to provide services in the Regional Model counties. • Evaluated DHCS’ method for requesting feedback from stakeholders before it selected the health plans, as well as the extent to which DHCS addressed that feedback during its selection process.

continued on next page...

AUDIT OBJECTIVE	METHOD
<p>5 For the counties served under the Regional Model, determine the following:</p> <p>a. Whether the level of care in those counties is disproportionately low as compared to other parts of California. To the extent possible, determine whether and how the level of care has changed since the implementation of the Regional Model.</p> <p>b. Whether the level of care received is acceptable as it relates to industry standards and state and federal requirements.</p> <p>c. Whether DHCS has taken steps to ensure that the plans adhere to the provisions of their contracts and whether DHCS has provided that information to the counties.</p> <p>d. Whether opportunities exist to improve the current level of care Medi-Cal beneficiaries receive under the Regional Model.</p>	<ul style="list-style-type: none"> • Analyzed DHCS' statewide alternative access standard data to determine whether Anthem and Health & Wellness provided beneficiaries in the Regional Model with access to care that was comparable to other parts of the State. • Analyzed statewide HEDIS data from 2015, the earliest year data was available, through 2018 to determine how the quality of care Anthem and Health & Wellness provided beneficiaries in the Regional Model changed since its implementation and whether that care was comparable to other parts of the State. • Reviewed DHCS' and Managed Health Care's audit reports to determine whether the care that Anthem and Health & Wellness provided was similar to the care provided by other plans operating in rural expansion counties. • Analyzed DHCS' provider directory data to calculate the number of providers with which Anthem, Health & Wellness, and Partnership contracted. <p>Interviewed staff at DHCS and Managed Health Care to identify criteria defining an acceptable level of care.</p> <ul style="list-style-type: none"> • Reviewed DHCS' and Managed Health Care's audit reports of Anthem and Health & Wellness to determine whether the health plans met state, federal, and contractual requirements. • Analyzed HEDIS data from 2015 through 2018 to determine whether Anthem and Health & Wellness met the minimum performance levels that DHCS required. • Analyzed DHCS' alternative access standard data to determine whether Anthem and Health & Wellness provided beneficiaries in the Regional Model with access to care that met state requirements. We were unable to identify the number of beneficiaries whose access to care exceeded the state requirements because DHCS could not provide us with records that identified the number of beneficiaries assigned to each health plan by zip code. <ul style="list-style-type: none"> • Reviewed DHCS' policies and procedures related to medical audits and corrective action plans. • Determined the extent to which DHCS made its monitoring results available to counties and potential stakeholders. • Evaluated DHCS' efforts to notify counties and potential stakeholders of its monitoring and of the results of that monitoring. • Interviewed a selection of Regional Model and Partnership county representatives to obtain their perspectives on DHCS' efforts to notify them of its monitoring results. <ul style="list-style-type: none"> • Interviewed DHCS staff to determine whether DHCS has identified opportunities to improve the Regional Model's level of care. • Evaluated DHCS' policies and procedures related to alternative access standards and network certification CAPs to identify opportunities to reduce access barriers. • Evaluated the extent of DHCS' authority to require health plans to take corrective actions. • Compared provider data from the Medical Board of California and the Osteopathic Medical Board of California to DHCS' provider directory data to determine whether Anthem and Health & Wellness have contracted with all of the available providers located in the Regional Model counties. • Evaluated the characteristics of DHCS' managed care models to determine whether any were better suited than others to serve the Regional Model counties.
<p>6 Determine whether DHCS, when negotiating and extending its contract with the Regional Model commercial plans, made efforts to consider and mitigate any concerns communicated to DHCS by affected counties. Assess whether the process was sufficiently transparent.</p>	<p>Interviewed DHCS staff and a selection of Regional Model county staff to determine whether DHCS requested feedback from the counties before it extended Anthem's and Health & Wellness's contracts.</p>

AUDIT OBJECTIVE	METHOD
<p>7 Evaluate what compels the Regional Model counties to remain in the existing commercial plan model as opposed to creating or joining a COHS.</p>	<ul style="list-style-type: none"> • Evaluated DHCS’ contracts with Anthem and Health & Wellness to determine whether they require the counties to remain in the Regional Model. • Interviewed DHCS staff and other personnel at selected Regional Model and Partnership counties, Partnership, and Gold Coast to identify the processes for joining or establishing a COHS, the cost of establishing a COHS, and the entities responsible for funding the establishment of a COHS. • Evaluated federal and state laws to determine whether they impose any limitations on DHCS’ contracting with an additional COHS.
<p>8 Review and assess any other issues that are significant to the audit.</p>	<ul style="list-style-type: none"> • Interviewed DHCS staff to determine its process for approving or denying alternative access standards. • Evaluated DHCS’ policies and procedures for reviewing alternative access standard requests. • Evaluated a selection of 30 alternative access standard requests to determine whether DHCS adhered to its policies and procedures when it approved them.

Source: Analysis of the Audit Committee’s audit request number 2018-122, state law, and information and documentation identified in the column titled Method.

Assessment of Data Reliability

The U.S. Government Accountability Office, whose standards we are statutorily required to follow, requires us to assess the sufficiency and appropriateness of the computer-processed information that we use to support our findings, conclusions, and recommendations. In performing this audit, we relied on DHCS’ provider directory, alternative access standard data, and HEDIS performance data to evaluate the access to care and quality of care that the Medi-Cal managed care health plans provided to their beneficiaries. Additionally, we relied on license and eligibility data from the Medical Board of California and the Osteopathic Medical Board of California in order to identify licensed medical providers who are eligible to contract with Medi-Cal. To evaluate these data, we performed electronic testing of the data, reviewed existing information about the data, interviewed agency officials knowledgeable about the data, and performed data set verification procedures. We found that the DHCS provider directory, alternative access standards, and HEDIS performance data were sufficiently reliable for the purposes of our audit.

However, during our review, we identified limitations with the Medical Board of California and Osteopathic Medical Board of California license data. Specifically, we found that the license data limited the number of practice locations for each provider and that not all providers submitted this information. As a result, we found the license data were of undetermined reliability for identifying the practice location of all providers. Although this determination may

affect the precision of some of the numbers we present, there is sufficient evidence in total to support our findings, conclusions, and recommendations.

August 2019



JENNIFER KENT
DIRECTOR

State of California—Health and Human Services Agency
Department of Health Care Services



GAVIN NEWSOM
GOVERNOR

Ms. Elaine M. Howle*
California State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

Dear Ms. Howle:

The California Department of Health Care Services (DHCS) hereby provides response to the draft findings of the California State Auditor's (CSA) report entitled, *Department of Health Care Services: It Has Not Ensured That Medi-Cal Beneficiaries in Some Rural Counties Have Reasonable Access to Care*. The CSA conducted this audit and issued 13 recommendations.

DHCS agrees with nine of the recommendations, disagrees with three of the recommendations, and believes it is already in compliance with the remaining recommendation. DHCS has prepared corrective action plans to implement the nine recommendations it agrees with. DHCS appreciates the work performed by the CSA and the opportunity to respond to the findings. If you have any questions, please contact Ms. Nicole Jacot, External Audit Coordination Manager, at (916) 713-8812.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer Kent', is written over a horizontal line.

Jennifer Kent
Director

Enclosure

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* California State Auditor's comments begin on page 59.

**Department of Health Care Services' Response to the California State Auditor's
Draft Report, *Department of Health Care Services: It Has Not Ensured That Medi-Cal Beneficiaries in Some Rural Counties Have Reasonable Access to Care*
Report Number: 2018-122 (19-06)**

Finding 1: The Department of Health Care Services (DHCS) has allowed health plans to require their Medi-Cal beneficiaries to travel hundreds of miles to receive care.

Recommendation 1

To ensure that beneficiaries in Regional Model counties have adequate access to care, DHCS should identify by August 2020 the locations requiring additional providers and the types of providers required. It should also develop strategies for recruiting and retaining providers in those locations. If it requires additional funding to complete this assessment or to implement actions to address its findings, DHCS should determine the amounts it needs and request that funding from the Legislature.

Current Status: Will Not Implement

Estimated Implementation Date: N/A

Implementation Plan:

As previously stated in the responses to the audit conducted by the California State Auditor titled: "Department of Health Care Services: Millions of Children in Medi-Cal Are Not Receiving Preventive Health Services," DHCS does agree increasing the number of physicians who practice in California is beneficial for all health care delivery systems; however, such statewide assessment is not something that DHCS is the subject matter expert in given that Medi-Cal is responsible for about 30% of the health care coverage. DHCS suggests that this would be better suited for the Office of Statewide Health Planning and Development (OSHPD) and the California Workforce Investment Board and DHCS would support OSHPD in addressing this important matter. However, we do note that within DHCS' purview, DHCS has been actively involved in implementing a physician and dental provider loan repayment program using Proposition 56 funds as authorized and approved in the Budget Act of 2018. These loan repayments were targeted specifically at newly-practicing providers that agree to see a specific percentage of Medi-Cal patients in their practice (at least 30 percent) and maintain that commitment for at least five years. The loans were open to both pediatric and adult providers and additional criteria will include providers that are practicing in high-need specialty areas such as child psychiatry or practicing in a medically underserved area. On July 2, 2019, DHCS announced that it paid \$58.6 million in student loans for 247 physicians through the loan repayment program. These efforts are specifically targeted at increasing participation in Medi-Cal within the state's existing workforce.

Recommendation 2

To obtain assurance that health plans throughout the state exhaust all of their reasonable options to meet the access requirements, DHCS should immediately begin doing the following: Develop written guidance that specifies the conditions under which staff should approve, deny, or contact health plans for clarification regarding their alternative access requests.

Current Status: Not Fully Implemented

Estimated Implementation Date: July 2020

Implementation Plan:

DHCS currently has written guidance that is used to process alternative access requests. DHCS ensures that the alternative access requests are being process correctly through a secondary review process that includes multiple levels of management. DHCS will continue to expand on the existing guidance, including information on process changes that will be put into place for the July 1, 2020, annual network certification process. ②

Recommendation 3

To obtain assurance that health plans throughout the state exhaust all of their reasonable options to meet the access requirements, DHCS should immediately begin doing the following: Determine a specific minimum number of providers that health plans must attempt to contract with prior to requesting an alternative access standard.

Current Status: Not Fully Implemented

Estimated Implementation Date: July 2020

Implementation Plan:

DHCS is in the process of modifying the alternative access request process for the July 1, 2020, annual network certification. The health plans will be required to search the same databases that DHCS uses when reviewing alternative access requests. If a provider is identified that is in closer proximity to what has been requested, the health plan will be required to submit contracting efforts to DHCS. DHCS would note that the amended process will be more stringent than what the CSA is suggesting. Previously, DHCS had a process that required the health plans to attempt to contract with a minimum number of providers and report that information to DHCS. DHCS was unable to process the requests in a timely fashion due to health plan errors. The enhancements that DHCS has made to date and is in the process of operationalizing for the July 1, 2020, annual network certification are both stricter and more efficient that what has been done in the past. ③

Recommendation 4

To obtain assurance that health plans throughout the state exhaust all of their reasonable options to meet the access requirements, DHCS should immediately begin doing the following: Require health plans to report on their attempts to contract with providers when submitting their alternative access standard requests, including providing evidence of their efforts, such as the contact information for each provider with which they have attempted to contract.

Current Status: Not Fully Implemented

Estimated Implementation Date: July 2020

Implementation Plan:

DHCS is in the process of modifying the alternative access request process for the July 1, 2020, annual network certification. The health plans will be required to search the same databases that DHCS uses when reviewing alternative access requests. If a provider is identified that is in closer proximity to what has been requested, the health plan will be required to submit contracting efforts to DHCS that would demonstrate why a health plan was unable to enter into such contracts.

Recommendation 5

To obtain assurance that health plans throughout the state exhaust all of their reasonable options to meet the access requirements, DHCS should immediately begin doing the following: Establish a process for periodically verifying the health plans' efforts, such as contacting a sample of the listed providers and determining whether the plans attempted to contract with them.

Current Status: Not Fully Implemented

Estimated Implementation Date: September 2019

Implementation Plan:

DHCS has already established a process to select a random sample of alternative access approvals and verify health plan contacting efforts. This process is currently underway for the approvals issued for the annual network certification process that was completed on July 1, 2019. DHCS aims to complete the sampling and analysis by September 2019.

Recommendation 6

To obtain assurance that health plans throughout the state exhaust all of their reasonable options to meet the access requirements, DHCS should immediately begin doing the following: Require health plans to authorize out-of-network care if they do not demonstrate they have exhausted all of their reasonable options to meet the access requirements, unless the health plans can demonstrate that closer providers are demanding unreasonably high rates or have documented deficiencies in quality of care.

④ **Current Status:** Will Not Implement/Already In Compliance

Estimated Implementation Date: N/A

Implementation Plan:

This is a current requirement in the health plan contract. The health plan contract requires that health plans allow beneficiaries to obtain medically necessary covered services from out-of-network providers if the services cannot be provided in-network. A

link to the current health plan boilerplate contract is listed below, but this requirement can be found in Exhibit A, Attachment 9 - Out of Network Providers. If DHCS denies an alternative access request, the health plan will be held to the contractual requirements prescribed in their contract and state and federal law. DHCS will deny alternative access requests when the department determines that there are potentially willing providers and a health plan has not sufficiently demonstrated that it made efforts to contract and providers were not willing to contract for reasonable rates.

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<https://www.dhcs.ca.gov/provgovpart/Pages/MMCDBoilerplateContracts.aspx>

Recommendation 7

To ensure that it promptly and sufficiently notifies counties and other stakeholders about health plans' quality of care deficiencies, DHCS should immediately do the following: (a) Post its medical audit reports to its website within one month after it issues the audit to the health plan. (b) Include information about its recently published medical audit reports and other monitoring efforts in its communication with counties and other stakeholders on its mailing list. (c) Ensure that relevant county officials are included on its mailing lists.

Current Status: Not Fully Implemented

Estimated Implementation Date: September 2019

Implementation Plan:

DHCS is currently in compliance with its state law requirements to post annual medical audits and their corrective action plans to its website once they have both been completed. DHCS does post its audit reports to its website once they have been completed and meet various requirements for public posting, such as accessibility. DHCS will include additional information on its monitoring efforts in its communications with stakeholders through its mailing lists.

⑤

Finding 2: DHCS has not ensured that all Medi-Cal beneficiaries in the rural expansion counties receive services through a model that best meets their needs.

Recommendation 8

To ensure that all counties are aware of the managed care model options available to them and of the steps necessary to implement those models, DHCS should provide by December 2019 information to all counties that clearly defines each managed care model and the steps and legal requirements needed to establish each model.

Current Status: Not Fully Implemented

Estimated Implementation Date: December 2019

Implementation Plan:

- ⑥ DHCS already provides via the DHCS website, the various Plan Model types and a description of each model. However, DHCS agrees to post additional information on the DHCS website for counties to access, that provides information on the steps and legal requirements to establish each model. In addition, DHCS has been willing to meet with counties when requested to discuss issues about managed care and answer questions regarding the models.

Link to current DHCS website for Plan Model Type Information:

<https://www.dhcs.ca.gov/services/Documents/MMCD/MMCDModelFactSheet.pdf>

Recommendation 9

To ensure that it makes informed decisions regarding the extension or renewal of its contracts with managed care health plans, DHCS should immediately begin the practice of requesting annual feedback from the counties that the health plans serve and of using that feedback in its decision-making process.

Current Status: Not Fully Implemented

Estimated Implementation Date: July 2020

Implementation Plan:

DHCS agrees to implement a practice of requesting annual feedback from the counties that the health plans serve and use that feedback in its decision-making process when extending or re-procuring health plan contracts.

Recommendation 10

To ensure that beneficiaries in the Regional Model counties have reasonable access to care, DHCS should do the following by June 2020: Determine the specific causes of Anthem's and Health and Wellness's inability to provide reasonable access to care in the Regional Model counties.

Current Status: Not Fully Implemented

Estimated Implementation Date: June 2020

Implementation Plan:

DHCS will conduct an analysis of access in the Regional Model using available data, existing workforce shortages information, alternative access standard requests, the independent Access Assessment required under the Special Terms and Conditions of the 1115 Waiver that is being conducted by the DHCS External Quality Review Organization, and other relevant information pertinent to the analysis as its being designed.

Recommendation 11

To ensure that beneficiaries in the Regional Model counties have reasonable access to care, DHCS should do the following by June 2020: Evaluate whether the structural characteristics of a County Organized Health System (COHS) model would be better suited to providing reasonable access to care in the Regional Model counties and notify the counties whether a COHS would improve beneficiaries' access to care. If some or all of these counties desire to transition to a COHS, DHCS should assist them in making that change after their current contracts expire.

Current Status: Not Fully Implemented

Estimated Implementation Date: Unknown

Implementation Plan:

Will implement as needed. As noted in recommendation ten, DHCS will conduct an analysis of access in the Regional Model. Once this analysis has been completed, DHCS will use the results to determine next steps. Additionally, DHCS has and will remain open to meeting with counties and plans to discuss what is necessary to transition to a different model.

⑦

Recommendation 12

To ensure that beneficiaries in the Regional Model counties have reasonable access to care, DHCS should do the following by June 2020: Evaluate whether it has the financial resources to provide assistance to counties interested in establishing COHSs or other managed care models after the current Regional Model contracts expire. If DHCS does not have the required financial resources, it should seek an appropriate amount of funding from the Legislature.

Current Status: Will Not Implement

Estimated Implementation Date: N/A

Implementation Plan:

DHCS will not implement as DHCS does not have the financial resources to provide direct financial assistance to counties to establish a Health Care Plan. The county interested in establishing a COHS would be responsible for seeking the necessary funding (from any source, whether county, state, or other) and overall county support to establish the COHS plan.

⑧

Recommendation 13

To ensure that beneficiaries in the Regional Model counties have reasonable access to care, DHCS should do the following by June 2020: Provide counties with reasonable opportunities to decide whether to change their managed care models after the expiration of the Regional Model health plan contracts. DHCS should provide counties who choose to do so sufficient time to establish their new models. DHCS should also include language in the 2020 request for proposals (RFP) to allow Regional Model

counties that can demonstrate their ability to implement a COHS model in their county by 2023 to opt out of the RFP process.

⑨ **Current Status:** Will Not Implement

Estimated Implementation Date: N/A

Implementation Plan:

⑨ The RFP release and the dates of implementation will not preclude counties from seeking a COHS model in those counties that are a part of the RFP. We would expect counties and plans interested in switching to a COHS model in any of the RFP counties to make DHCS aware during the RFP process, which should provide them a reasonable amount of time to choose to opt out of the RFP process and take the necessary steps to implement a COHS model.

COMMENTS

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE DEPARTMENT OF HEALTH CARE SERVICES

To provide clarity and perspective, we are commenting on DHCS' response to our audit. The numbers below correspond to the numbers we have placed in the margin of DHCS' response.

We stand by our recommendation. As we state on page 24, given DHCS' critical role in overseeing the State's provision of Medi-Cal services, we believe that it is well positioned to perform the assessment of locations requiring additional providers and strategies for recruiting those providers we describe. If DHCS believes that it would benefit from collaborating with other state agencies, we would encourage it to do so while still maintaining overall responsibility for performing this assessment.

①

Contrary to its assertion, the written guidance DHCS currently uses to process alternative access requests, which we evaluated during the audit, is inadequate. As we state on page 21, DHCS lacks formal guidance specifying the conditions under which its staff should approve or deny a request. Consequently, DHCS cannot ensure that its staff approve only those requests in which health plans have demonstrated that they exhausted all reasonable options to obtain closer providers so that beneficiaries are not required to travel excessive distances to receive care.

②

DHCS' statement is incorrect. As we state on page 20, DHCS has not established a minimum number of providers that health plans should attempt to contract with in a designated location before it considers an alternative access standard request. By not requiring health plans to demonstrate that they have attempted to contract with a minimum number of providers before approving their alternative access standard requests, DHCS cannot ensure that the health plans have exhausted all reasonable efforts to seek providers that are closer to beneficiaries.

③

We disagree with DHCS' statement that it is already in compliance with our recommendation. We acknowledge that the current contracts for Anthem and Health & Wellness contain a requirement that the health plans must allow beneficiaries to obtain medically necessary covered services from out-of-network providers if they cannot provide the services in-network. However, we did not observe DHCS sufficiently enforcing this requirement during our audit. As we report on page 21, DHCS initially placed health plans

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on network certification CAPs in 2018 to enforce the requirement but closed those CAPs after approving alternative access standard requests for those health plans that were still unable to meet access requirements. However, DHCS approved those requests even when health plans did not demonstrate that they had exhausted all reasonable options to obtain closer providers. We look forward to reviewing DHCS' 60-day response to the audit recommendations to learn about the steps that it will implement to enforce this contract requirement when it determines that health plans have not made sufficient efforts to contract with providers.

- ⑤ DHCS misses the point of our recommendation, which is to ensure that it promptly and sufficiently notifies counties and other stakeholders about health plans' quality of care deficiencies. Although state law allows DHCS to delay the publication of health plan audits until the health plans complete the medical audit CAPs, which we acknowledge on page 30, we believe counties could better assist their beneficiaries if DHCS informed them of performance issues more promptly. Therefore, to provide this important information in a more timely manner to counties, we recommended DHCS post its medical audit reports to its website within one month after it issues the audit to the health plan, which state law allows.
- ⑥ We look forward to reviewing DHCS' 60-day response to learn about the progress it has made to post additional information regarding the steps and legal requirements to create each model. However, DHCS also needs to send this information directly to counties—especially rural counties that lack resources and ability to seek such information—to ensure that they are informed of their managed care options. Simply posting or updating information on DHCS' website does not necessarily ensure that counties become aware of such information; we cite examples on page 30 of counties that find DHCS' website overwhelming or that experience difficulties finding information on DHCS' website about health plans.
- ⑦ DHCS' approach to implement this recommendation does not sufficiently address the issues we identified with access to care. As we state starting on page 39 of the report, there are structural aspects of the COHS Model that may provide better access to care for beneficiaries in the Regional Model counties than those beneficiaries currently receive. However, the analysis that DHCS refers to, which is described in its implementation plan for recommendation 10, does not include an evaluation of whether the COHS Model would be better suited to provide reasonable access to care in the Regional Model counties. Until DHCS performs the evaluation we recommend and proactively assists counties

that desire to transition to a COHS, those counties with limited resources may not be able to establish the health care systems that could best serve their beneficiaries.

We disagree with DHCS' perspective. Because the Regional Model includes many counties that may desire to transition to a single multicounty COHS, we believe that it would be more effective for DHCS to submit a consolidated funding request to the Legislature rather than for each county to submit its own individual request. As we state on page 7, DHCS is the state agency responsible for administering Medi-Cal. By submitting a single request, DHCS would help expedite authorization of such funding and would also help ensure that all of the counties are treated equitably, despite differences in their size and resources. As we characterize on page 42, small and rural counties may not be able to develop the infrastructure required to change their managed care models without DHCS' assistance.

⑧

We disagree with DHCS' determination that it does not need to implement our recommendation. Although DHCS acknowledges that the release of the RFP and the dates of implementation will not preclude affected counties from seeking a COHS Model, it did not specify that it would include that provision in the RFP. By implementing our recommendation to include language in the 2020 RFP to allow counties to opt out of the Regional Model if they can demonstrate their ability to implement a COHS Model, DHCS would demonstrate its commitment to helping small and rural counties improve the access to care for their beneficiaries.

⑨

March 2016 | Issue Brief

Medi-Cal Managed Care: An Overview and Key Issues

Margaret Tater, Julia Paradise, and Rachel Garfield

Executive Summary

California's Medicaid program, Medi-Cal, is the largest state Medicaid program in the nation, insuring almost one-third of California's more than 38 million residents. In the early 1970s, California was the first state to enter into risk contracts with managed care plans to serve some Medicaid beneficiaries, rather than pay for services on a fee-for-service (FFS) basis. Over the decades since that time, Medi-Cal has been progressively moving more beneficiaries into managed care. More than three-quarters of all Medi-Cal beneficiaries, including low-income children, adults, seniors, and people with disabilities, are now enrolled in managed care plans. Besides being the earliest Medicaid managed care program and, by far, the largest in the nation, at nearly 10 million enrollees, the Medi-Cal managed care program has a unique structure, an outgrowth of underlying historical differences in the health care systems and traditions in different counties of the state. As other state Medicaid programs increase their use of risk-based managed care, and policymakers, plans and providers, and advocates seek to understand and learn from developments in this area to guide future change, a review of Medi-Cal's managed care evolution is both timely and illustrative. It also serves to illuminate some potential implications of the proposed rule on Medicaid managed care issued by the federal Centers for Medicare & Medicaid Services (CMS) and expected to be finalized in the Spring of 2016, which represents a major overhaul of current regulatory requirements and standards.

A number of observations stand out from this review:

- **County-based structure.** California's managed care program is unique, involving six different managed care models, shaped by the historical and continuing role of counties in financing and delivering primary care, public hospital services, mental health services, and certain long-term services and supports to poor and medically indigent residents. More than two-thirds of all Medi-Cal managed care enrollees are enrolled in public safety-net plans; the others are served by a mix of commercial and private non-profit health plans.
- **Phased managed care expansion.** In the early days of the state's managed care program, in a limited number of counties, managed care enrollment was mandated for nearly all Medi-Cal beneficiaries, including seniors and people with disabilities. Over time, California has expanded mandatory managed care to additional counties and to broader segments of the beneficiary population, including seniors and people with disabilities statewide, under the state's "Bridge to Reform" section 1115 waiver (2011); children who were transitioned from CHIP to Medi-Cal (2013); low-income adults covered previously through the state Low Income Health Program and those newly eligible for Medi-Cal under the ACA (2014); and, under the state's

seven-county Financial Alignment Demonstration and on a voluntary basis, beneficiaries dually eligible for Medicare and Medicaid (2014).

- **Access to care.** Problem with access to care in Medi-Cal FFS carry over into managed care, challenging Medi-Cal health plans to establish adequate provider networks and improve care. Gaps in access to certain specialists, including psychiatrists and other behavioral health providers, and long-term care services, are the most significant gaps. Providers have cited Medi-Cal's low payment rates as a barrier to their participation in the program and sued the state on the basis that the fees violate federal Medicaid payment standards. Language and cultural gaps in access to care and gaps in rural access are additional issues.
- **Benefit carve-outs.** Medi-Cal managed care plans provide for most primary and acute care services. However, certain services are "carved out" from managed care contracts. In particular, while mental health services for mild or moderate mental illness are included in plan contracts, specialty mental health services and substance use disorder treatment continue to be delivered through county mental health departments and local and county alcohol and drug programs. In most counties, nursing home care and certain home and community-based services (HCBS) are also carved out of managed care.
- **Managed long-term services and supports.** In 2014, under its Coordinated Care Initiative in seven counties, California required all Medi-Cal beneficiaries, including dually eligible enrollees who were previously exempt from managed care, to enroll in a managed care plan to receive their Medi-Cal benefits, including nursing home and certain HCBS.
- **Transitions for people with complex needs.** California's experience shows that robust transition planning is necessary to minimize disruptions in care for beneficiaries with complex needs who are required to move from FFS to managed care. Beneficiary and provider engagement, timely transfers of data, continuity of care protections, beneficiary information and navigation assistance, and coordination with carve-out services emerge as essential elements of sound transitions.
- **Increasing focus on metrics, performance, and accountability.** California has taken significant steps to improve the data reported by Medi-Cal managed care plans, which are needed for rate-setting, managed care monitoring, efforts to move to value-based purchasing. The state also established a managed care performance dashboard that makes plan-level quality and other data available to the public, increasing the program's transparency and plan accountability.
- **Major current issues.** Two recent developments – CMS' proposed modernization of the Medicaid managed care regulations and the approval of "Medi-Cal 2020," the renewal of California's section 1115 waiver – can be expected to bear on the Medi-Cal managed care program, by increasing plan- and state-level requirements and state oversight responsibilities, and by setting the stage for potential changes in the role and operation of managed care plans in a transforming health care delivery and payment system.

Introduction

California's Medicaid program, Medi-Cal, is the largest state Medicaid program in the nation. Insuring almost one-third of California's more than 38 million residents,¹ Medi-Cal is a key source of health coverage in the state and the main source of coverage for low-income children, adults, and people with disabilities. It also provides wrap-around coverage for many elderly Medicare beneficiaries in the state.

For several decades, Medi-Cal has been transitioning away from a fee-for-service (FFS) payment and delivery system to one that relies on risk-based managed care. Under the FFS system, beneficiaries could see any provider who accepted Medi-Cal, and providers were reimbursed for each individual service or visit. Under managed care, the state contracts with health plans to deliver Medi-Cal benefits to enrollees in exchange for a monthly premium, or "capitation" payment for each enrollee. The plans are accountable for and at financial risk for providing the services in the contract.

California was the first state to pilot managed care in Medicaid, beginning in the early 1970s, and the Medi-Cal managed care program has a unique structure that grew out of the different health care delivery and financing systems in different counties of the state. Over time, California has transitioned progressively more Medi-Cal beneficiaries into managed care, and its program is, by far, the largest Medicaid managed care program in the nation, with nearly 10 million children, adults, seniors, and people with disabilities – or more than three-quarters of all Medi-Cal beneficiaries – enrolled in plans.

In its early managed care pilot programs, California awarded contracts to health plans to serve Medi-Cal beneficiaries in a specified county or service area. Over time, the Department of Health Care Services (DHCS), California's Medicaid agency, expanded the reach of its managed care program to include additional counties. Later, as part of the "California Bridge to Reform Demonstration," a Section 1115 waiver approved by CMS in November 2010,² the state extended mandatory managed care to seniors and people with disabilities enrolled in Medi-Cal. California opted to expand Medi-Cal eligibility under the Affordable Care Act (ACA), greatly increasing the number of Medi-Cal beneficiaries overall and in managed care plans. As of July 2015, 77% of Medi-Cal beneficiaries were enrolled in Medi-Cal managed care plans,³ and in October 2015, over 10 million beneficiaries were enrolled in Medi-Cal managed care plans.⁴ In addition, DHCS has collaborated with the Centers for Medicare and Medicaid Services (CMS) to launch a demonstration program in seven large counties under which beneficiaries who are dually eligible for Medicare and Medicaid may enroll in capitated managed care plans that provide the full range of services covered by both programs, including managed long-term services and supports (MLTSS).

As other states increase their reliance on risk-based managed care to serve their Medicaid beneficiaries, this review of California's transition to a largely managed care-based Medicaid program is both timely and informative for Medicaid's many stakeholders. It also serves to highlight some potential implications for Medi-Cal of CMS' [proposed rule on Medicaid managed care](#), a major overhaul of the current regulations that is expected to be finalized in the Spring of 2016.

Structure of Medi-Cal Managed Care Program

COUNTY-BASED MANAGED CARE MODELS

A distinguishing feature of Medi-Cal’s managed care program is that different managed care models operate in different counties (Figure 1), shaped strongly by the historical role of the counties in the financing and delivery of primary care, public hospital services, mental health services, and certain long-term services and supports to poor and medically indigent residents. In the 1980’s, the first

Medi-Cal managed care programs began as **County Organized Health System (COHS)** plans, including the Health Plan of San Mateo and Santa Barbara Regional Health Authority, operating under Section 1915(b) waivers. COHS plans were created by counties, with mandatory enrollment for virtually all Medi-Cal beneficiaries in the county service area (including seniors and persons with disabilities) and with almost all Medi-Cal services covered. In the early 1990’s, Medi-Cal expanded its managed care program by adding more COHS plans (e.g., Partnership Health Plan serving Solano and Napa Counties, CalOptima serving Orange County, and Central California Alliance for Health serving Santa Cruz and Monterey Counties).

The state also created the **Two-Plan Model**, which was designed to shift large segments of the Medi-Cal population into managed care while preserving the role of traditional safety-net providers,⁵ and the **Geographic Managed Care Model (GMC)** in Sacramento and San Diego Counties. The Two-Plan Model offers enrollees a choice between one commercial plan and one “Local Initiative” public plan. Like COHS plans, Local Initiative plans are public entities and are expected to work collaboratively with county public hospitals and safety-net providers to support the safety-net delivery system. In general, Two-Plan Model counties tend to be ones with large Medi-Cal populations and public hospital systems critical to the safety-net; they include nine of California’s 12 public hospital health system counties⁶.

Local Initiative plans enjoy strong local support and have generally secured a 65%-85% Medi-Cal market share, with commercial plans in their service areas playing a smaller role. Notably, although there is only one Local Initiative plan in each county, some of them subcontract with one or more commercial plans, effectively providing Medi-Cal enrollees in these counties with more than two plan options. For example, L.A. Care, the Local Initiative plan in Los Angeles County, subcontracts with Anthem Blue Cross, Care1st, and Kaiser Permanente, in addition to providing health plan services directly to enrollees.⁷

Medi-Cal Managed Care Models
County Organized Health System (COHS). A health plan created and administered by a County Board of Supervisors. Within a COHS county, all managed care enrollees are in the same plan. (22 counties)
Two-Plan Model. This model is comprised of a publicly-run entity (a “Local Initiative”) and a commercial plan. (14 counties)
Geographic Managed Care (GMC). In this model, DHCS contracts with a mix of commercial and non-profit plans that compete to serve Medi-Cal beneficiaries. (2 counties)
Regional Expansion Model. DHCS contracts with two commercial plans in each county. (18 counties)
Imperial Model. This model only operates in Imperial County where DHCS contracts with two commercial plans.
San Benito (Voluntary) Model. This model only operates in San Benito County where DHCS contracts with one commercial plan.

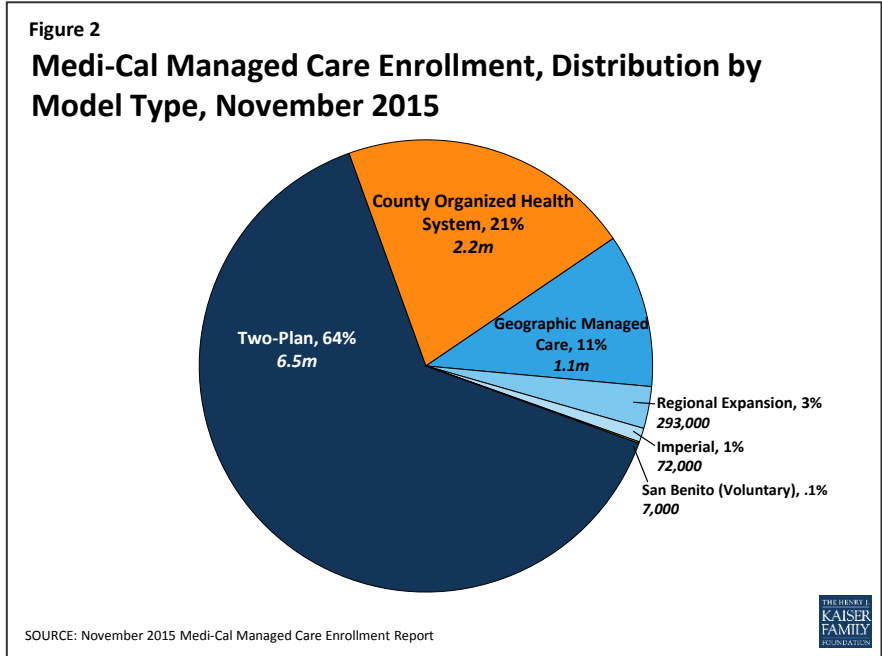
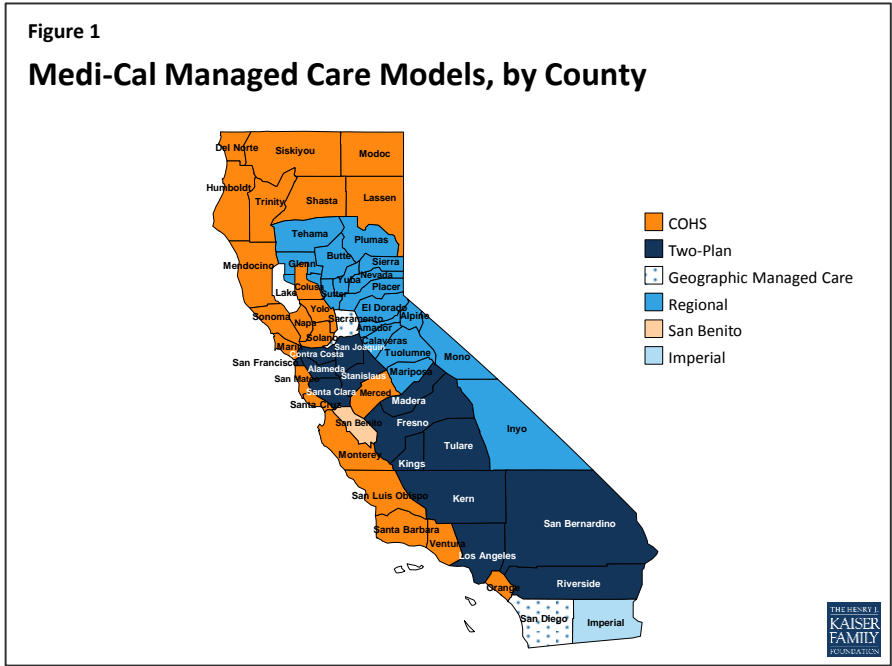
The GMC Model relies on a mix of commercial and non-profit health plans but does not include Local Initiative plans. Enrollees in GMC counties have more than two plan options.⁸ Like in COHS, enrollment in both the Two-Plan and GMC Models is mandatory for low-income adults and children, but, unlike in COHS, enrollment in the Two-Plan and GMC Models was initially voluntary for seniors and persons with disabilities, becoming mandatory in 2012.

Finally, the **Regional Expansion, Imperial, and San Benito**

(Voluntary) Models were created when Medi-Cal began expanding managed care to rural areas in late 2013. Both the Regional Expansion and Imperial Models involve contracts with two commercial plans. When children in the Healthy Families Program – California’s Children’s Health Insurance Program (CHIP) – who were enrolled in Kaiser Permanente’s Healthy Families plan transitioned to Medi-Cal coverage in 2013, the state contracted with Kaiser Permanente in three Regional Expansion Model counties to ensure continuity of care for these children.⁹ The San Benito Model allows Medi-Cal enrollees in San Benito County to choose between FFS and the one contracted commercial plan.

In all then, six different managed care models operate across California’s 58 counties today.¹⁰ Reflecting population distribution across the state, the largest share of Medi-Cal beneficiaries – nearly two-thirds as of October 2015 (64%) – were enrolled in the Two-Plan Model.

Another 21% were enrolled in the COHS Model, and 11% were enrolled in the GMC Model (Figure 2). A large majority of Medi-Cal managed care enrollees (68%) were served through local public plans (COHS plans and Local Initiative plans under the Two-Plan Model), while about one-third were served through commercial plans (Figure 3).



KEY PROGRAMMATIC DIMENSIONS OF MEDI-CAL MANAGED CARE

• MANAGED CARE PLAN ENROLLMENT

People can apply for Medi-Cal in several ways: by mail, in person, by phone through their County Social Services Office, or, since the launch of the ACA coverage expansions in 2014, online via the Covered California website (www.coveredca.com). Once their eligibility is determined, individuals are enrolled in Medi-

Cal and issued a Benefits Identification Card. They then choose from two or more health plan options, or are auto-assigned to a plan if they do not select a plan. In COHS counties, a single plan administers Medi-Cal and all enrollees are mandatorily enrolled in that plan. In San Benito County, only one health plan is available and beneficiaries may enroll in that plan or choose to stay in Medi-Cal FFS.

• PRIMARY CARE PROVIDER SELECTION

Upon enrollment in a health plan, beneficiaries choose a primary care physician (PCP) who is in the health plan's network or, if they do not choose a PCP, the health plan will assign them one. Notably, California established special provisions regarding PCP selection for ACA Medicaid expansion adults in the 12 counties with public hospital health systems¹¹ that previously served these adults through Low Income Health Programs¹² (discussed below) and county indigent programs. As in other counties, Medicaid expansion adults in these counties either select or are automatically assigned by their health plan to a PCP. However, to maintain support for the county public hospital health systems, for the period January 1, 2014 through December 31, 2016, plans must auto-assign at least 75% of newly eligible adults who do not select a PCP to a PCP in the county hospital health system until the system meets its enrollment target or notifies the plan that it is at capacity. The required percentage drops to 50% beginning January 1, 2017.^{13 14}

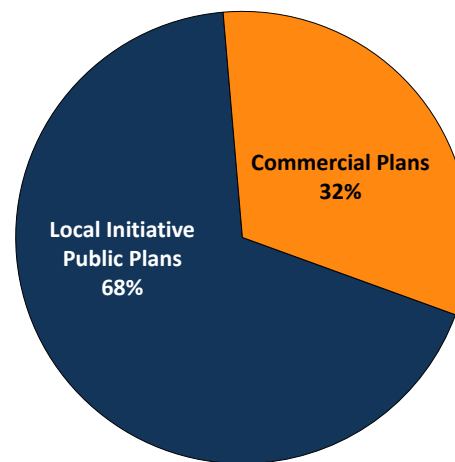
• BENEFITS AND CARVE-OUTS

Medi-Cal covers comprehensive primary and acute care, behavioral health care, and long-term services and supports (LTSS) for beneficiaries. While most primary and acute care benefits for managed care enrollees are provided by the managed care plans, the following services are generally “carved out” and provided on a FFS basis:

- Dental care;
- Specialty mental health services, such as targeted case management, partial hospitalization, and outpatient and inpatient mental health services (delivered through county mental health departments, which are responsible for intake, triage, and treatment of people who meet specific eligibility criteria for serious mental illness);

Figure 3

Medi-Cal Managed Care Enrollment, Distribution by Plan Type, November 2015



SOURCE: November 2015 Medi-Cal Managed Care Enrollment Report

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- Substance use disorder treatment services (delivered by local and county alcohol and drug programs);
 - In-Home Supportive Services, which include personal assistance and other services that enable seniors and persons with disabilities to live safely in their homes (administered by counties, except in the seven MLTSS counties, where these services are provided by the health plan);
 - Home and community-based waiver services (HCBS), such as case management, continuing care nursing, day care, and respite services, for beneficiaries who would otherwise meet the functional eligibility criteria for institutional care (except in the seven MLTSS counties, where services authorized under the Multipurpose Senior Services HCBS waiver are covered by the health plan); and
 - Skilled nursing facility services beyond 91 days (except in COHS counties and the seven MLTSS counties, where these services are provided by the health plan).
- **PROVIDER NETWORK ADEQUACY AND OTHER ACCESS STANDARDS**

Except for most COHS plans, Medi-Cal managed care plans are licensed by the California Department of Managed Health Care (DMHC) and are subject to statutory and regulatory consumer protections, including network adequacy requirements.¹⁵ In addition, all DHCS contracts with health plans specify network adequacy standards. The COHS plans (except for the Health Plan of San Mateo) are exempt from statutory licensure requirements but are subject to the network adequacy requirements contained in their Medi-Cal contracts. (Appendix Table 1 describes network adequacy standards in Medi-Cal managed care. Appendix Table 2 describes standards for timely appointments in Medi-Cal managed care.)

RECENT MEDI-CAL MANAGED CARE EXPANSIONS

To prepare for the implementation of the ACA coverage expansions in 2014, California applied for its “Bridge to Reform” Section 1115 demonstration waiver, which CMS approved in November 2010.¹⁶ This section 1115 demonstration waiver allowed the state to implement the Low Income Health Program, an expansion of county-based coverage programs for low-income adults, who would later become eligible for new ACA coverage options.). The waiver also allowed the state to pursue fundamental program changes intended to improve health outcomes and ensure the long-term financial sustainability of the Medi-Cal program. Mandatory enrollment of seniors and persons with disabilities (SPDs) in managed care was among these changes. Waiver amendments in subsequent years further expanded managed care to additional populations and geographic areas. Ultimately, over the period 2011-2014, California transitioned or enrolled almost 5 million Medi-Cal beneficiaries into managed care under authority provided by the Bridge to Reform waiver, including beneficiaries in rural counties; seniors and persons with disabilities; children previously covered by Healthy Families, the state’s Children’s Health Insurance Program (CHIP); individuals previously enrolled in the Low-Income Health Program; and adults newly eligible for Medi-Cal under the ACA.

- **SENIORS AND PERSONS WITH DISABILITIES (SPDs)**

Prior to 2011, California mandated managed care enrollment for seniors and persons with disabilities (SPDs) only in COHS counties. In all other managed care models, enrollment of seniors and persons with disabilities was voluntary. However, in 2011, after the Bridge to Reform waiver was approved, the state began to transition these beneficiaries, excluding those dually eligible for Medicare and Medicaid, into managed care in 16 additional counties that had managed care for other Medi-Cal populations at the time, and where managed care for seniors and persons with disabilities had previously been voluntary. During the 12 months beginning June 2011, nearly 240,000 SPDs were enrolled into managed care plans in these

counties, where they were offered a choice of at least two plans. As California began to expand mandatory managed care to rural counties in 2013, SPDs in these counties were also enrolled in plans.¹⁷ As of September 2014, 647,968 seniors and persons with disabilities (non-dually eligible) were enrolled in Medi-Cal managed care, making up 7.7% of all Medi-Cal managed care enrollment statewide.¹⁸

- **CHILDREN ENROLLED IN THE HEALTHY FAMILIES PROGRAM**

Starting in 2013, children enrolled in the Healthy Families Program were moved into Medi-Cal. This change was intended to simplify eligibility and coverage for children and families; improve children's coverage through retroactive eligibility, increased access to vaccines, and expanded mental health benefits; and eliminate premiums for lower-income children in the Healthy Families Program.¹⁹ The shift was also expected to produce budget savings for the state, as average rates paid to Medi-Cal plans were generally lower than those paid under the Healthy Families Program for a largely equivalent benefit package (after adjustments for carve-outs).²⁰ DHCS identified approximately 750,000 children eligible to be transitioned to Medi-Cal; the transition was implemented in four phases to minimize service disruptions and ensure continued access to care.²¹

- **ADULTS IN LOW INCOME HEALTH PROGRAM AND NEWLY ELIGIBLE ADULTS UNDER THE ACA**

Through the Low Income Health Program (LIHP), county and local entities strengthened their primary and specialty care delivery systems, implemented primary care medical homes, and enrolled over 630,000 uninsured adults ages 19-64 with incomes up to 200% of the federal poverty level in coverage. On January 1, 2014, all but 24,000 LIHP enrollees (whose incomes qualified them instead for subsidies for Marketplace plans) became eligible for Medi-Cal under the ACA Medicaid expansion and were enrolled in managed care plans.

RECENTLY ADDED SERVICES IN MANAGED CARE

Since 2011, California has expanded the benefits covered under managed care contracts through amendments to its Bridge to Reform waiver. The services added include adult day health services, mental health services and, in seven demonstration counties, certain long-term services and supports, as further described below.

- **COMMUNITY-BASED ADULT SERVICES (CBAS) BENEFIT**

Prior to 2011, Adult Day Health Care (ADHC), a community-based day care program that provided health, therapeutic, and social services for persons at risk of nursing home placement, was offered as an optional Medicaid State Plan service on a FFS basis. To achieve budget savings, Governor Brown's January 2011 budget plan proposed to eliminate the ADHC benefit, and in March 2011, the state legislature voted to eliminate the ADHC benefit, subject to CMS approval (which was delayed until April 2012).²² In August 2011, DCHS began transitioning ADHC participants from FFS to managed care plans, which were to coordinate their medical and social support needs. Later, under a settlement with the ADHC providers, the Community-Based Adult Services (CBAS) benefit — utilizing the same ADHC providers — was created to replace ADHC as a managed care benefit only. In effect, the former ADHC benefit was carved into managed care as the new CBAS benefit. Accessible only to managed care enrollees, Community-Based Adult Services became the first community-based LTSS managed care plan benefit. Currently, CBAS providers serve 31,000 managed care enrollees statewide.

- **MANAGED LONG-TERM SERVICES AND SUPPORTS (MLTSS)**

In January 2012, Governor Jerry Brown proposed his Coordinated Care Initiative (CCI), aimed at improving health outcomes and beneficiary satisfaction for low-income seniors and persons with disabilities, while achieving substantial savings from rebalancing the delivery of long-term services and supports toward home and community-based care.²³ The CCI proposal was enacted by the state legislature in 2012 to be implemented in seven counties in 2014.²⁴ One component of the CCI was a mandatory managed long-term services and supports (MLTSS) program. The second component, a demonstration program for persons dually eligible for Medicare and Medicaid, is described later.

In the seven CCI counties, Medi-Cal beneficiaries, including dually eligible enrollees who were exempt from managed care before 2014, are required to enroll in a managed care plan to receive their Medi-Cal benefits, including the following long-term services and supports: consumer-directed In-Home Supportive Services, Community-Based Adult Services, the Multipurpose Services and Supports Program (the state’s HCBS waiver services for frail elders), and long-term (over 91 days) skilled nursing facility services. Other HCBS waiver services (such as those under the state’s Assisted Living waiver and the waiver for persons with intellectual and developmental disabilities) remain carved out. MLTSS coverage began on April 1, 2014. As of October 2015, over 300,000 dually eligible beneficiaries were enrolled in the MLTSS program in the seven counties.

- **MENTAL HEALTH SERVICES AND AUTISM CARE**

In 2014, mental health services for mild or moderate mental illness were added to managed care contracts (specialty mental health services continue to be carved out and provided through the counties). Also, in 2015, behavioral health therapy for beneficiaries with autism or autism spectrum disorder was added as a Medi-Cal-covered benefit and will be covered by managed care plans in 2016.

Other Managed Care Initiatives

DUAL ELIGIBLE DEMONSTRATION

As mentioned earlier, the seven-county CCI also provided for a three-year Financial Alignment Demonstration (“Dual Demonstration”), as authorized by the ACA to promote coordinated health care delivery for individuals dually eligible for Medicare and Medicaid. Under the demonstration, called “Cal MediConnect,” dually eligible enrollees can elect to receive all of their Medicare and Medicaid services, including medical, behavioral health, and institutional and home and community-based long-term services and supports, through a single managed care plan. Plan participation in the Dual Demonstration is limited to Medi-Cal plans already serving the area. Participating plans contract with other entities to provide some services, such as behavioral health and In-Home Supportive Services, although the goal is that dually eligible beneficiaries receive all their care in a single, organized delivery system. A Memorandum of Understanding (MOU) between the state and CMS authorizing the Dual Demonstration outlines its principles and operational plan.²⁵

The Dual Demonstration puts many new demands on Medi-Cal health plans, including the requirement to cover Medicare Part A, B, and D benefits as well as Medi-Cal long-term services and supports. To accomplish this, plans must organize providers who have not previously contracted with managed care plans or who have not previously provided services to Medicare beneficiaries. Under the Dual Demonstration, plans are also subject to specific and detailed DHCS and CMS contract requirements to maintain continuity of care, perform

health risk assessments, and use person-centered, interdisciplinary care management teams. Enrollment in the Dual Demonstration is voluntary; as of December 1, 2015, 115,743 dually eligible enrollees – about one-quarter of the eligible population – were enrolled in it.²⁶

MANAGED CARE DATA INITIATIVES AND DASHBOARD

In late 2012, DHCS initiated the statewide Encounter Data Improvement Project (EDIP). The goal of the EDIP is to improve the timeliness, accuracy, and completeness of encounter data reported by managed care plans, to improve rate-setting and managed care monitoring, and to prepare for value-based purchasing. As part of the project, DHCS develops performance metrics and works with managed care plans to address their data collection and reporting deficiencies. This collaborative effort on data and metrics is critical in connection with performance reporting and will be foundational to value-based purchasing in the future.

To increase transparency regarding the quality of managed care plans, DHCS has created a [Managed Care Performance Dashboard](#) that provides plan-reported data on a variety of measures to help DHCS and other stakeholders examine and understand managed care activity and performance at the state level, by managed care model, and at the individual plan level. The dashboard contains metrics related to enrollment, enrollee health care utilization, appeals and grievances, and quality of care. The dashboard stratifies the plan-reported data by beneficiary population.²⁷

Key Challenges and Lessons

ACCESS TO CARE

Provider payment rates and participation. Managed care plans are required to maintain adequate provider networks and capacity to ensure access to care for their members. Historically, Medi-Cal FFS payment rates have been among the lowest Medicaid fees in the nation.²⁸ Research has shown a positive relationship between fee levels and physician participation in Medicaid.^{29 30 31} In managed care, although provider payment rates are a contractual matter between plans and providers, the role of persistent low rates in depressing provider participation and beneficiary access continues to be a major issue. California providers have sued the state on the basis that Medi-Cal rates violate the “equal access” provision of federal Medicaid law.^{32 33} This provision requires that payment rates be “consistent with economy and efficiency... and sufficient to enlist enough providers so that care and services are available under the plan at least to the extent that such care and services are available to the general population in the geographic area.”³⁴ On November 2, 2015, CMS issued a final rule implementing the equal access provision, which requires states to conduct access reviews on a regular basis and to consider the findings from those reviews in setting provider rates. However, CMS limited application of the latter requirement to FFS rate-setting, stating that standards for capitation payment rates are set in the June 1, 2015 proposed rule on Medicaid managed care.³⁵

Data from a 2012 survey of Medi-Cal enrollees show that the vast majority of beneficiaries found it easy to find a provider who accepted Medi-Cal, but almost 1 in 5 enrollees had difficulty. Fewer than half of Medi-Cal enrollees said it was easy to find a specialist or mental health provider who accepted Medi-Cal; enrollees in fair or poor health were particularly likely to report difficulty finding specialists.³⁶ A separate analysis, based on national survey data, found that Medi-Cal adults were significantly more likely than adults with Medicaid in

other states not to have a doctor visit (37% vs. 30%) or a specialist visit (48% vs. 36%) and to delay care because of difficulty getting an appointment.³⁷ Along with medical groups and other physicians, federally qualified health centers (FQHCs) and community clinics play an important role in providing primary care for Medi-Cal beneficiaries, but arranging specialist referrals for patients in these settings is an ongoing challenge.

A recent federal report shows that 54% of office-based physicians in California were accepting new Medicaid patients in 2013, compared to nearly 69% of office-based physicians nationally who were doing so.³⁸ A 2013 California survey of physicians, including facility-based physicians, found a higher rate overall -- 62% accepting new Medi-Cal patients, compared to 75% for Medicare and 79% for privately insured patients.³⁹ The rate was 70% among pediatricians, but just over 50% among other primary physicians. Facility-based specialists were mostly likely to accept new Medi-Cal patients, and only 36% of psychiatrists did so. In June 2015, the California State Auditor issued a report identifying major gaps in state oversight of Medi-Cal plan provider networks to ensure their adequacy, a high volume of unanswered calls to the office of the Medi-Cal managed care ombudsman, and inconsistent monitoring of Medi-Cal plans to ensure they meet Medi-Cal beneficiaries' medical needs.⁴⁰

Linguistic and cultural gaps in access. Another challenge in Medi-Cal is the lack of linguistic and cultural concordance between the current provider workforce and the low-income population in California. A 2013 analysis by the state showed that 40% of Californians eligible for Medi-Cal reported a language other than English as their primary language and that 13 languages met the state's definition of a "Threshold Language" spoken at a high proportional rate within a geographic area.⁴¹ A separate study documented that nearly 40% of all Californians and approximately 50% of Medi-Cal beneficiaries are Latino, but that only 5% of licensed physicians in California are Latino and only 6% of California physicians speak Spanish.⁴²

Rural areas. While access to care is generally sufficient in most urban areas, securing access to care in rural areas is more challenging for publicly and privately insured patients alike. FQHCs, rural health centers (RHCs), and other health clinics form the backbone of the ambulatory care delivery system serving low-income populations in rural counties, and these safety net provider play an increasingly critical role in Medi-Cal managed care networks in rural as well as other areas of the state.⁴³

TRANSITIONS TO MANAGED CARE

California's shift of seniors and people with disabilities from FFS to managed care yielded important lessons about the importance of appropriate planning to foster smooth transitions and avoid disruptions in care, especially for people with complex health care needs.

Stakeholder engagement. Robust stakeholder engagement is needed to support smooth managed care transitions.⁴⁴ In implementing the Healthy Families and Low Income Health Program transitions and the Dual Demonstration, DHCS increased its engagement with beneficiaries, advocates, providers, and plans. For example, in the Dual Demonstration, the state held extensive webinars, workshops, and stakeholder meetings, which state officials said resulted in better and more effective outreach.⁴⁵ DHCS also established a dedicated [webpage](#) to report on all meetings, updates, and notices.

Data issues. In the SPD transition, inaccurate enrollee contact information, privacy rules that prevented plans and providers from accessing beneficiary medical records, and other data problems made timely implementation of care coordination challenging for Medi-Cal plans. The state was able to improve its data-sharing processes in the Dual Demonstration to give plans more time to contact incoming enrollees and prepare for their needs. Still, contacting beneficiaries to complete health assessments to support care management remains a challenge for plans, particularly in the case of individuals newly eligible for Medi-Cal and people without stable addresses.

Continuity-of-care protections. SPDS were permitted to request continued access to an out-of-network provider for 12 months following their plan enrollment.⁴⁶ However, lack of plan, provider, and beneficiary understanding of this provision led to unnecessary disruptions in established patient-provider relationships. In subsequent managed care transitions, DHCS and plans increased their engagement with enrollees and providers to improve understanding of the continuity-of-care protection. DHCS also incorporated specific continuity-of-care requirements in its managed care contracts.

Enrollment processes. In the lead-up to the Dual Demonstration, advocates and plans urged greater transparency in the enrollment process and beneficiary protections, including the right to opt out of or disenroll from the Demonstration. In response, the state published the enrollment schedule and the mailing dates for notices to beneficiaries, to help advocates and insurance assisters prepare and stage beneficiary outreach and education efforts. The state also published issues that arose in the beneficiary notice/enrollment process and the steps the state took to address them. Advocates and plans also worked with DHCS to improve the managed care enrollment process for beneficiaries with LTSS needs and dually eligible beneficiaries.

Coordination with carve-out services. Coordination between plan and carve-out services is an ongoing challenge. This came up in the SPD transition, particularly in the context of mental health care, as prescription drugs were provided by plans, while specialty mental health services were carved out and provided by county mental health departments.⁴⁷ In the MLTSS transition, plan coordination with waiver services that remained carved-out was also difficult. Differences between waiver service care managers and health plans in their assessments of beneficiary needs and care goals can create access barriers for beneficiaries.

IMPROVING QUALITY

Performance measurement and monitoring. Managed care contracting enables states to measure and require accountability for quality. Through its contracts, California requires Medi-Cal managed care plans to periodically submit various quality-related reports, including Consumer Assessments of Healthcare Providers and Systems (CAHPS) survey findings, Healthcare Effectiveness and Data Information Set (HEDIS) scores, reports on member complaints, grievances, and resolutions, and other statistical reports.

Transparency. DHCS collection and monitoring of quality data and the public availability of data on plan performance in the Managed Care Performance Dashboard strengthen the foundation for state oversight of managed care, transparency of plan quality, and value-based purchasing strategies. DHCS works with Medi-Cal plans to improve its quality measures and refine its enforcement mechanisms. This work includes developing corrective action plans to improve plans' quality reporting and outcomes and reporting formats that capture data accurately and completely. DHCS also conducts an annual quality forum to publicly recognize plans for

their progress and achievements in quality performance. Poor-performing plans may be subject to enforcement actions or corrective action plans, or may lose out under the state’s auto-assignment algorithm.

Special reports for Dual Demonstration plans. All plans participating in the Dual Demonstration must submit additional reports to CMS that include data on quality metrics for both Medi-Cal and Medicare services. DHCS and CMS review these reports and work with the plans to ensure that data are reported consistently to support evaluation purposes. DHCS recently published the first quarterly Health Risk Assessment Dashboard, which compares the plans’ compliance with the requirement to complete Health Risk Assessments for Dual Demonstration members.⁴⁸

Major Current Issues

MEDICAID MANAGED CARE RULE

CMS’ proposed rule on Medicaid managed care would modernize and fundamentally redraw the current regulatory framework for managed care. It would strengthen beneficiary protections and network adequacy requirements, establish requirements to increase the fiscal integrity of capitation rates, address health care delivery and payment reform in managed care, increase state and plan accountability for access and quality, and strengthen oversight of Medicaid managed care programs.⁴⁹ If these provisions are preserved in the final rule, expected in the Spring of 2016, they could have significant bearing on provider networks and beneficiary access to care, provider payment, and other issues in the Medi-Cal managed care program.

In a letter to CMS submitted during the public comment period on the rule, the California Hospital Association expressed support for the overall direction of the rule and many of its specifics, but also identified some major concerns. Chief among them is the concern that the rule’s proposed limitations on states’ ability to direct plan expenditures and plan payments to specific providers would interfere with current supplemental payments targeted to certain hospitals— typically, safety-net and public hospitals that serve large numbers of Medicaid beneficiaries.⁵⁰ The letter to CMS also commented on many other provisions of the proposed rule, recommending stronger standards in some areas and increased flexibility in others, and stressing the need for adequate state resources to audit and enforce the regulatory standards.

SECTION 1115 WAIVER RENEWAL

California’s Bridge to Reform demonstration waiver expired on October 31, 2015. DHCS applied for a five-year extension of the waiver under the name “Medi-Cal 2020” and, on December 30, 2015, the terms of that waiver were announced. Among the key components of the waiver is the Public Hospital Redesign and Incentives in Medi-Cal (PRIME) fund, a pool of up to almost \$7.5 billion in combined federal and state spending over the five-year waiver period for delivery system reform in California’s public hospital systems. The PRIME pool builds off the Delivery System Reform Incentive Program (DSRIP) included in California’s original waiver. DHCS will use it to fund public provider system projects to change care delivery and strengthen the ability of these systems to be paid under risk-based alternative payment models (APMs) that hold providers accountable for quality and the cost of care. The waiver documents state that CMS and the state will measure the success of PRIME, in part, by assessing the progress in moving to APMs for designated entities through Medi-Cal

managed care.⁵¹ It remains to be seen exactly how the DSRIP and PRIME pools will interact with the Medi-Cal managed care program and what the implications will be for plans and their Medi-Cal members.

Medi-Cal 2020’s “Whole Person Care Pilots,” intended to provide more integrated care for vulnerable, high-utilizing beneficiaries, also involve Medi-Cal plans. In these county-based pilots, Medi-Cal managed care plans, safety-net providers, and other community-based service providers and affordable housing providers, are expected to develop innovative partnerships to address social determinants of health as well as integrate physical and behavioral health care and improve beneficiary health and well-being.

Looking Ahead

In the short time from 2011 to 2015, California expanded managed care to 28 rural counties, transitioned or enrolled almost 5 million beneficiaries into managed care, carved adult day health and mental health services into managed care, and, in seven counties, launched a managed long-term services and supports program and a Dual Demonstration. Currently, Medi-Cal managed care plans operate in all 58 counties in California and cover over three-quarters of all Medi-Cal enrollees. To absorb the influx of new members, including many with complex care needs, Medi-Cal plans have been challenged to expand their provider networks and reinforce their operations rapidly to handle increased demand for services, increased demand on call centers, and utilization management, care management, quality improvement, and claims processing on a larger scale. In addition, the state has been challenged to provide adequate notice and education to enrollees transitioning to managed care and to ensure that health plans receive data on a timely basis.

Other states considering managed care expansions – especially, expansions to Medicaid populations with more complex care needs – can learn from California’s experience. Managed care is unlikely to solve longstanding access problems attributable to systemic provider shortages and/or low Medicaid payment rates and limited provider participation. As states expand their managed care programs to more Medicaid beneficiaries, including those with high needs, ensuring that plan networks are adequate to serve their enrollees could be more challenging for both plans and states. Robust transition planning is essential to minimize disruptions in care when states mandate that new groups of FFS beneficiaries enroll in managed care plans. Engaging beneficiaries, providers, consumer advocates, and other stakeholders in this planning process and its implementation is necessary to ensure that beneficiaries know how to navigate their plans to obtain needed services and assistance and are fully informed about their rights and options. Data-sharing systems and procedures to support managed care transitions, and information systems and data analytics capacity to support ongoing monitoring, oversight, and performance improvement are integral to both plan and state accountability for Medicaid managed care programs.

California, like many other states, is increasingly oriented toward achieving better performance from its managed care contractors. Key areas of focus include further delivery system transformation to improve care while reducing costs; enhanced care integration; expansion of managed long-term services and supports; transparency regarding health outcomes of managed care enrollees; and improving population health. To meet these challenges, managed care plans will need to develop new ways to engage beneficiaries, partner with community-based social services and supportive housing organizations, and structure provider payment models to promote health care quality and outcomes – all in the context of limited federal and state funding.

Finally, if, as managed care evolves in new ways, its potential to provide more coordinated and integrated care is to be optimized and gaps in access are to be minimized, close state monitoring of managed care plans and rigorous enforcement of federal and state managed care requirements will continue to be essential.

The authors wish to acknowledge valuable input and assistance from Michael Engelhard, Donna Laverdiere, and Lisa Shugarman, all of Health Management Associates.

Appendix Table 1: Network Adequacy Standards in Medi-Cal Managed Care

Knox-Keene Act Standards ^a	Medi-Cal Two-Plan and GMC Contract Standards ^b	COHS Contract Standards ^b
General Requirements		
<p>Comprehensive range of primary, specialty, institutional, and ancillary services readily available at reasonable times to all enrollees.</p>	<p>Maintain network adequate to serve 60% of all eligible beneficiaries within the service area and provide full scope benefits. Ensure appropriate provider network, including PCPs, specialists, and other personnel and an adequate number of inpatient facilities within the service area.</p>	<p>Submit a complete provider network adequate to provide covered services to eligible beneficiaries within the service area. Increase capacity of the network to accommodate growth.</p>
Time and Distance Standards		
<p>Primary care and hospital services must be available within 30 minutes or 15 miles of enrollee's residence or workplace. Laboratory, pharmacy, and similar services available at locations within a reasonable distance from PCP.</p>	<p>Maintain a network of PCPs located within 30 minutes or 10 miles of a member's residence unless MCO has an approved alternative standard.</p>	<p>Maintain a network of PCPs located within 30 minutes or 10 miles of a member's residence unless MCO has an approved alternative standard.</p>
Provider-to-Enrollee Ratios and Other Access Standards		
<ul style="list-style-type: none"> • PCPs: 1: 2,000 • Total physicians: 1: 1,200 • Complete network of PCPs and specialists with admitting staff privileges at least one contracting hospital equipped to provide range of basic health care services • Emergency 24/7 • Access to medically required specialists 	<ul style="list-style-type: none"> • PCPs: 1: 2,000 • Total physicians: 1: 1,200 • Non-physicians not to exceed provider/patient caseload of 1: 1,000 • Emergency services 24/7 • Adequate number and type of specialists 	<ul style="list-style-type: none"> • PCPs: 1: 2,000 • Total physicians: 1: 1,200 • Non-physicians not to exceed provider/patient caseload of 1: 1,000 • Emergency services 24/7 • Adequate number and type of specialists

^aTitle 28, California Code of Regulations, §1300.51.H and §1300.67.2.

^bCOHS Boilerplate Contract and Two Plan Boilerplate Contract, available at <http://www.dhcs.ca.gov/provgovpart/Pages/MMCDBoilerplateContracts.aspx>

Appendix Table 2: Timeliness Standards for Appointments in Medi-Cal Managed Care

Type of Appointment	Standard for Timeliness
Urgent care, no prior authorization	48 hours*
Urgent care, prior authorization	96 hours
Non-urgent primary care	10 business days of request
Specialist care	15 business days of request
Non-urgent ancillary services for diagnosis or treatment of injury, illness, or other health condition	15 business days of request
First prenatal visit	10 business days
Urgent dental care	72 hours
Non-urgent dental care	36 business days
Preventive dental care	40 business days

* The COHS contract has a more stringent urgent care provision that requires that a member needing urgent care be seen within 24 hours.

Endnotes

¹ Cite to new SHFO CPS data once posted.

² Most of the state's Medi-Cal managed care programs were included in the California "Bridge to Reform" Section 1115 waiver amendment effective for the 2010 – 2015 time period. The waiver amendment also expanded the managed care programs to include seniors and persons with disabilities, expanded managed care to additional counties, and added benefits. California Bridge to Reform Section 1115 Demonstration Fact Sheet, Updated August 2015. Accessed at <http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/ca/ca-bridge-to-health-reform-fs.pdf>

³ See <http://kff.org/medicaid/state-indicator/managed-care-penetration-rates-by-eligibility-group/>

⁴ Medi-Cal Managed Care Enrollment Report, October 2015, available at http://www.dhcs.ca.gov/dataandstats/reports/Documents/MMCD_Enrollment_Reports/MMCEnrollRptOct2015.pdf

⁵ *Medi-Cal Managed Care*, Medi-Cal Facts No. 8, March 2000, Medi-Cal Policy Institute, a project of the California Health Care Foundation. Accessed at <http://www.chcf.org/~media/MEDIA%20LIBRARY%20Files/PDF/PDF%20M/PDF%20mmc2.pdf>

⁶ California's 12 public hospital health system counties are: Alameda, Contra Costa, Kern, Los Angeles, Monterey, Riverside, San Bernardino, San Francisco, San Joaquin, San Mateo, Santa Clara, and Ventura. *All Plan Letter 13-022*, California Department of Health Care Services, July 25, 2014, available at <http://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2013/APL13-022.pdf>. These 12 counties are served under the Two Plan Model, except for Monterey, San Mateo, and Ventura counties, which are served by COHS plans. .

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¹⁰ California Department of Health Care Services, *Medi-Cal Managed Care Program Fact Sheet – Managed Care Models*, November 2014. Accessed at <http://www.dhcs.ca.gov/provgovpart/Documents/MMCDModelFactSheet.pdf>; Medi-Cal Managed Care Enrollment Report, August 2015. Accessed at <http://www.dhcs.ca.gov/dataandstats/reports/Pages/MMCDMonthlyEnrollment.aspx>

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¹² California's "Bridge to Reform" section 1115 waiver, approved in November 2010, created the Low Income Health Program (LIHP), which allowed counties to receive federal Medicaid reimbursement for providing health services through the LIHP to residents who would become newly eligible for coverage under the ACA Medicaid expansion in 2014.

¹³ *All Plan Letter 13-022*, op. cit.

¹⁴ MCOs can avoid oversight action associated with not meeting the 75% auto-assignment standard if they demonstrate that they have attempted to meet it but are constrained by regulatory geographic access standards.

¹⁵ Knox-Keene Health Care Service Plan Act of 1975, §1367.03, and Title 28, California Code of Regulations §1300.51 and §1300.67.2.

¹⁶ Bridge to Reform Waiver Resources, California Department of Health Care Services, available at <http://www.dhcs.ca.gov/provgovpart/Pages/1115-Bridge-to-Reform.aspx>

¹⁷ SPDs in an additional 19 rural counties (Alpine, Amador, Butte, Calaveras, Colusa, El Dorado, Glenn, Imperial, Inyo, Mariposa, Mono, Nevada, Placer, Plumas, Sierra, Sutter, Tehama, Tuolumne, and Yuba) began to transition to mandatory enrollment in Medi-Cal managed care in December 2014.

¹⁸ Medi-Cal Managed Care Performance Dashboard, , California Department of Health Care Services, accessed at: <http://www.dhcs.ca.gov/services/Documents/MMCD/20150305MMCPDashboard.pdf>

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²⁰ *The 2012-13 Budget: Analysis of the Governor's Healthy Families Program Proposal*, Legislative Analyst's Office, February 17, 2012. Accessed at <http://www.lao.ca.gov/analysis/2012/health/healthy-families-021712.aspx>

²¹ California Department of Health Care Services, *Healthy Families Program Transition to Medi-Cal: Final Comprehensive Report*, February 4, 2014. Accessed at <http://www.dhcs.ca.gov/provgovpart/Documents/Waiver%20Renewal/AppendixCHFP.PDF>

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CALIFORNIA HEALTHCARE FOUNDATION



On the Frontier:
Medi-Cal Brings Managed Care to
California's Rural Counties

MARCH 2015

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About the Foundation

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Introduction

Beginning late in 2013, California's Medi-Cal program expanded managed care into 28 primarily rural counties that include some of the state's most geographically remote areas. Many of these counties have very limited health care provider capacity, particularly for specialty care, behavioral health services, and services and supports to seniors and persons with disabilities. All but two of the counties have a population below 200,000, and 18 of the most sparsely populated are designated as "frontier" counties or have "frontier" areas.¹

As of July 2014, more than 400,000 Medi-Cal beneficiaries had joined Medi-Cal managed care health plans under this rural expansion.² This report offers a "first look" at implementation of the expansion and identifies key issues and opportunities to help guide policy and program development going forward. In particular, the report looks at:

- ▶ The unique characteristics of the health care environments in the rural expansion counties
- ▶ Managed care plan standards and how the relevant state agencies — the California Department of Health Care Services (DHCS) and the California Department of Managed Health Care (DMHC) — are and will be evaluating the performance of Medi-Cal managed care in rural areas
- ▶ What early data indicate are key issues that require state attention going forward

This report is based on interviews with a wide range of key informants, including senior DHCS and DMHC officials overseeing the program, and leading representatives of hospitals, doctors, clinics, counties, health plans, and consumers. (See Appendix A.) Interviews were conducted between November 2013 and June 2014. In addition, various publicly available documents, and information on the health plan programs obtained through Public Records Act requests to DHCS and DMHC, were reviewed.

Background on Medi-Cal Managed Care

Over 30 years ago, the State of California began transforming the Medi-Cal program from fee-for-service (FFS) delivery (state management and payment of claims for services submitted by providers) to managed care (state contracting with public and private health plans that arrange and pay for services). The state has implemented a variety of managed care models over the years, including County Organized Health Systems (COHS), in which one public plan serves an entire county, and beginning in the early 1990s, the Two-Plan Model, which in 14 counties provides beneficiaries with a choice between a private and a public plan. California also implemented Geographic Managed Care (GMC), which offers beneficiaries a variety of plan options, in two counties. With the state's managed care expansion into rural counties, California has adopted an approach that relies upon both a COHS model and a Regional Model, which offers two commercial plan options.

From the managed care program's inception, each COHS served most Medi-Cal beneficiaries in a county, including seniors and persons with disabilities, while the Two-Plan Model and GMC programs started with mandatory enrollment only of low-income women and children. In 2011, the state began requiring seniors and persons with disabilities in Two-Plan counties to enroll in a managed care plan, with certain exceptions.³

Responsibilities of Health Plans and the State

Health plans providing coverage in the Medi-Cal managed care program receive monthly per-person payments (capitation) from the state, which contracts with the plans to organize provider networks, including negotiation of rates, incentives, and other payment arrangements, and to assume responsibility for assuring that care delivery meets state statutory and contractual standards related to access, availability, and quality.

Under California law, all managed care plans (not including COHS plans) must be licensed as health care service plans under the Knox-Keene Health Care Service Plan Act of 1975 (Knox-Keene).⁴ In addition, each plan participating in Medi-Cal must meet specific Medi-Cal contractual and regulatory standards affecting how services are

arranged and paid for by the plan. Except for formal Knox-Keene licensure, the standards applied to COHS plans are the same as those for all other types of Medi-Cal managed care plans. The Knox-Keene standards apply to a managed care plan whether it provides services in an urban or suburban jurisdiction or in a new rural expansion county. Similarly, the regulatory and contractual standards DHCS has set for health plans operating in rural expansion counties are the same as those for health plans operating in urban and suburban counties.

Rural counties differ significantly in number and type of health care providers as compared to urban and suburban counties. In recognition of these differences, this report focuses on the early evidence of health plan performance in meeting certain DHCS standards in the rural expansion counties. These include standards pertaining to access and availability of health care services, including provider network composition and maximum travel time and distance from primary care providers, hospitals, and specialists.

Glossary of Terms: Medi-Cal Managed Care

County Organized Health System (COHS). An independent public agency that contracts with the state to be the sole administrator of Medi-Cal benefits for an entire county; all Medi-Cal beneficiaries in the county, excluding certain carved-out populations, are mandatorily enrolled in the single COHS plan.

Frontier Area. A Medical Service Study Area (MSSA) that has low population density, as designated by the California Office of Statewide Health Planning and Development. A “rural” MSSA has a population density of less than 250 persons per square mile and no census-defined area with a population exceeding 50,000. A rural MSSA is further designated as “frontier” if it has a population density of less than 11 persons per square mile.

Geographic Managed Care (GMC). A model of Medi-Cal managed care in which the state contracts with, and offers to Medi-Cal beneficiaries, multiple commercial health plan options within a single county.

Local Initiative (LI). A Knox-Keene-licensed, county-sponsored managed care plan that serves an entire county (or multiple counties) as the public plan in a Two-Plan Model. The LI is established by county ordinance but is legally independent from county government.

Medi-Cal Managed Care Delivery Models. Service delivery and contracting models for managed care in Medi-Cal, which include County Organized Health Systems, Geographic Managed Care and Two-Plan Model programs, and the Regional Model, a slightly modified version of the Two-Plan approach, created for the rural expansion.

Medical Service Study Area (MSSA). Sub-city and sub-county geographical units used to organize and display population, demographic, and physician data.

Medically Underserved Area (MUA) and Medically Underserved Population (MUP). Medically underserved areas and populations that are federally designated based on criteria established by the federal Health Resources and Services Administration. The four criteria are the ratio of primary care physicians per 1,000 population, infant mortality rate, percentage of the population below the poverty level, and percentage of the population age 65 and over.

Regional Model. A model of Medi-Cal managed care developed for the rural expansion in which the state contracts with two commercial plans to administer Medi-Cal benefits in a county or counties, with Medi-Cal beneficiaries having a choice between the two plans. (In San Benito County, beneficiaries choose either a commercial plan or FFS.)

Two-Plan Model. A model of Medi-Cal managed care in which the state contracts with two plans, one a public Local Initiative and the other a commercial health plan, to administer Medi-Cal benefits in a specific county or counties, with Medi-Cal beneficiaries having a choice between the two plans.

Bringing Medi-Cal Managed Care to Rural Counties

Goals of Rural Managed Care Expansion

In public statements and in interviews for this report, DHCS summed up the benefit of managed care for rural counties as the opportunity to strengthen the organization of health care in those communities by assisting Medi-Cal beneficiaries to “get the care they need at the right time by the right provider.” Within this overall purpose, DHCS’s basic goals for the rural expansion effort, as described in a presentation to stakeholders in 2012, are to deliver:

- ▶ Quality care in an environment that manages costs
- ▶ Care that is medically necessary and appropriate for the beneficiary’s condition
- ▶ Care by the most appropriate provider and in the least-restrictive setting

Additional benefits of managed care for rural populations identified by DHCS in that presentation include:

- ▶ A medical home that coordinates care, emphasizes prevention and wellness, and provides case management
- ▶ Supplemental support through nurse advice phone lines
- ▶ Transportation assistance
- ▶ Assistance getting appointments with specialists
- ▶ Health education
- ▶ Grievance systems
- ▶ Greater accountability through reporting of Healthcare Effectiveness Data and Information Set (HEDIS) and other data⁵

In interviews, DHCS also identified the following dynamics that particularly affect rural areas and associated expectations for health plans:

- ▶ **Rural provider options can be limited.** As a consequence, health plans will need to demonstrate

access across a region by addressing geographic barriers to care.

- ▶ **Access and transportation barriers can be more significant in rural areas.** Therefore, health plans have a stronger obligation to ensure that rural beneficiaries can reach providers who offer the plans’ covered benefits.
- ▶ **Hospital dynamics are different.** There may be only one hospital in a rural region, which therefore can have more control in pricing and thus create cost pressures for the health plan.
- ▶ **Providers invited to join health plan networks are accustomed to FFS payment.** Health plan efforts to switch to capitation payment arrangements may require longer-term development.

Structure of Rural Managed Care

The FY 2012-13 California State Budget, as set forth in Assembly Bill 1467, authorized DHCS to implement Medi-Cal managed care in the rural expansion counties.⁶ After a competitive Request for Application process, DHCS selected four health plans to serve Medi-Cal beneficiaries in 28 expansion counties. Of these, a Regional Model, composed of two commercial health plans, operates in 19 counties; eight counties are served by a COHS; and in one county, beneficiaries have a choice of a private health plan or Medi-Cal FFS. (See Table 1 on page 6 and map on page 7.)

AB 1467 requires enrollment in a Medi-Cal managed care plan for the following Medi-Cal beneficiaries in the 28 expansion counties: low-income families with children associated with CalWORKS; pregnant women; seniors and persons with disabilities; and low-income adults newly eligible for Medi-Cal under the Affordable Care Act (ACA). Certain Medi-Cal enrollees or services are excluded, or “carved out,” such as children whose condition makes them eligible for California Children’s Services, beneficiaries for whom Medicare is their primary source of coverage (“dual eligibles”), and people eligible for HIV/AIDS Home and Community Based Waiver services. As a COHS, Partnership HealthPlan of California (Partnership) assumed responsibility at implementation for all the required Medi-Cal populations in the counties it serves. The health plans operating in the Regional Model started with low-income families, pregnant women, and single adults; seniors and persons with

Table 1. Health Plans in Rural Managed Care Expansion Counties

PLANS	COUNTIES	EFFECTIVE DATE
Partnership HealthPlan	Del Norte, Humboldt, Lake,* Lassen, Modoc, Shasta, Siskiyou, and Trinity	September 1, 2013
Anthem Blue Cross California Health & Wellness	Alpine, Amador, Butte, Calaveras, Colusa, El Dorado, Glenn, Inyo, Mariposa, Mono, Nevada, Placer, Plumas, Sierra, Sutter, Tehama, Tuolumne, and Yuba	November 1, 2013
California Health & Wellness Molina Health Systems	Imperial	November 1, 2013
Anthem Blue Cross Fee-for-Service Medi-Cal†	San Benito	November 1, 2013

*Partnership HealthPlan began operating in Lake County on September 1, 2013, under a previously approved expansion.

†Maintained by DHCS to provide a second choice for beneficiaries in San Benito county.

Sources: "Medi-Cal Managed Care Program Fact Sheet — Managed Care Models," www.dhcs.ca.gov; Medi-Cal Managed Care Models map, www.dhcs.ca.gov; DHCS Interested Parties Letter, February 28, 2013.

disabilities began joining these plans in a second-phase expansion that started December 1, 2014.

Characteristics of Rural Expansion Counties and Their Health Care Systems

Until quite recently, health care delivery in rural California, whether privately or publicly funded, has relied on the FFS delivery model. Under this FFS system, to participate in Medi-Cal a hospital, community health center, private physician, or other provider executed a Medi-Cal provider agreement. DHCS directly administered the treatment authorization process and contracted with a fiscal intermediary to process and pay medical claims. In contrast, under a managed care arrangement DHCS steps back from direct benefit administration while health plans assume responsibility for the organization and delivery of care, including network development, treatment authorization, and claims payment.

While data are limited, the evidence of past efforts to bring managed care to rural areas in California indicates that these areas have not offered a hospitable environment for it. In a 2002 study, California’s Legislative Analyst looked at reasons for withdrawal of managed care plans from the state’s rural areas from 1997 through 2002.⁷ According to the Legislative Analyst, the plans withdrew due to a combination of factors:

- ▶ Rural residents were more expensive to cover because the populations as a whole were older,

had lower incomes, were more likely to be unemployed, and had poorer health than those in urban areas.

- ▶ Plans had difficulty distributing risks and costs of health care across a small population of covered enrollees because there were insufficient numbers of healthy enrollees to offset higher-cost enrollees.
- ▶ Plans faced shortages of health care providers, including primary care physicians (PCP), who were needed to fill plan networks.
- ▶ Plans had difficulties building comprehensive provider networks due to geographic distances and a limited number of specialists in certain areas.
- ▶ Plans had concerns about low payer reimbursement rates and their ability to fund the costs of care.

According to informants for this report, most of the dynamics identified by the Legislative Analyst in 2002 still exist. However, the context has changed. First, the Medi-Cal populations to be enrolled in rural managed care are now potentially large enough to offset historic health plan concerns about distributing risks and costs. Second, most of the participating health plans have had more than a decade of experience delivering managed care in the Medi-Cal program since the 2002 study. Nonetheless, the underlying dynamics of limited provider availability, particularly for specialty care, and the demographic composition of these rural areas remain the same.

Figure 1. The 28 Medi-Cal Managed Care Rural Expansion Counties and Their Health Plans



Demographics of the Rural Expansion Counties

The economies of most of the 28 rural expansion counties are based on agriculture, recreation, or tourism. Nearly all were hit hard by the economic recession that began in 2007, and the lingering effects are still felt in most. Many of the Legislative Analyst’s 2002 findings on the challenges facing rural counties remain true today, as evidenced by poverty, unemployment, and public program participation data. (See Table 2 on page 8.)

A recent report by The Robert Wood Johnson Foundation (RWJF), *County Health Rankings 2014: California*, offers a

portrait of health disparities across California’s 58 counties by looking at certain health outcomes (length of life, health/mental health status, birth outcomes) and health factors (health behaviors, clinical care, social and economic factors, physical environment). The RWJF report shows that 19 of the 28 rural expansion counties (68%) rank in the bottom half of all California counties for at least one of these two measures and 15 counties (54%) rank in the bottom quarter for at least one of the measures. (See Appendix B.)

Further, for residents of the 28 rural expansion counties, medical underservice is a regular challenge. Geographic

Table 2. Selected Demographics of the 28 Rural Managed Care Expansion Counties

	POPULATION	POVERTY RATE	UNEMPLOYMENT RATE	CALFRESH ENROLLMENT	MEDI-CAL ENROLLMENT	MUA/MUP	RURAL MSSA	FRONTIER MSSA
California	38,340,074	15%	8%	4,288,454	7,594,872	n/a	n/a	n/a
Alpine	1,079	14%	11%	180	193			x
Amador	36,151	11%	8%	3,400	4,606	x	x	
Butte	222,316	21%	9%	30,349	62,008	x	x	x
Calaveras	44,650	10%	9%	5,077	6,701		x	
Colusa	21,660	15%	20%	1,788	4,710		x	x
Del Norte	28,131	22%	10%	5,143	8,219	x	x	
El Dorado	182,404	8%	7%	12,323	19,110	x	x	
Glenn	28,353	20%	11%	3,666	7,202	x	x	x
Humboldt	134,648	20%	7%	18,180	27,304	x	x	x
Imperial	180,672	23%	22%	36,840	68,088	x	x	x
Inyo	18,590	11%	7%	2,179	3,641	x	x	x
Lake	64,699	24%	10%	10,814	18,109	x	x	
Lassen	32,581	15%	10%	3,230	6,146	x	x	x
Mariposa	18,467	15%	8%	2,050	2,888	x	x	x
Modoc	9,197	20%	11%	997	2,084	x		x
Mono	14,143	10%	7%	915	1,381		x	
Nevada	97,225	12%	6%	7,792	11,668	x	x	
Placer	366,115	8%	6%	18,252	31,026		x	x
Plumas	19,140	14%	12%	1,951	3,112	x	x	x
San Benito	57,517	13%	11%	6,303	10,336	x	x	
Shasta	179,412	18%	10%	24,156	41,918	x	x	x
Sierra	3,089	17%	12%	302	487	x		x
Siskiyou	45,231	20%	12%	7,003	10,671	x	x	x
Sutter	95,733	17%	15%	12,740	23,430	x	x	
Tehama	63,717	20%	10%	10,860	18,073	x	x	x
Trinity	13,389	18%	12%	1,771	2,826	x	x	x
Tuolumne	53,604	13%	8%	5,536	8,283	x	x	x
Yuba	73,682	21%	13%	13,089	20,868	x	x	

Notes: **CalFRESH** is California's version of the federal Supplemental Nutrition Assistance Program (SNAP) that provides food assistance for low-income families. **MUA/MUP** stand for Medically Underserved Area and Medically Underserved Population, which are defined by the number of primary care physicians per population, plus other factors. **Rural MSSA** (Medical Service Study Area) refers to an area with less than 250 persons per square mile and no population center exceeding 50,000. **Frontier MSSA** refers to a Rural MSSA with less than 11 residents per square mile.

Sources: California Department of Finance, "Population Estimates for Cities, Counties, and the State — January 1, 2013 and 2014"; US Bureau of the Census, American Community Survey, "5-Year Estimate (2008-2012) for Poverty Rate"; California Economic Development Department, *Monthly Labor Force Data for Counties for 2013, Report 400C*; California Department of Social Services, *Food Stamp Program Participation and Benefit Issuance Reports (DFA256)*, April 2014; California Department of Health Care Services, "Number of Medi-Cal Beneficiaries by County: July 2011," July 2012; California Office of Statewide Health Planning and Development, "Medically Underserved Areas and Populations" (map), October 2010 and "California Medical Service Study Areas, Urban, Rural and Frontier Defined Areas," September 2010.

isolation and transportation difficulties are common barriers to obtaining medical care, particularly specialty care. Of the 28 counties, 23 include designated Medically Underserved Areas (MUA) or Medically Underserved Populations (MUP). (See Table 2.)

Health Care Providers in the Rural Expansion Counties

The starting point for developing Medi-Cal managed care in the 28 rural expansion counties has been each county’s existing health care infrastructure. Most of the expansion counties have basic infrastructure, but several lack essential health system building blocks. For example, there are 17 hospitals in the eight new counties served by Partnership HealthPlan of California, and 29 hospitals in the 20 counties served by Anthem Blue Cross (Anthem) and California Health & Wellness (CHW). Three counties, however, have no hospital. (See Appendix D for a complete list of hospitals in the 28 counties.)

Community health centers (CHC) and rural health clinics (RHC) form the backbone of the ambulatory care delivery system in these rural California counties. (See Table 3.) CHCs, including Federally-Qualified Health Centers (FQHCs), FQHC look-alikes, and community health clinics, free health clinics, and Indian health clinics, are nonprofit or public, community-directed health care

providers serving low-income and medically underserved communities. Almost one-quarter of the 995 CHCs in California are located in rural communities and many serve the 28 expansion counties.

RHCs are clinics specifically dedicated to increasing primary care services for Medicare and Medicaid patients in underserved rural areas. RHCs may be nonprofit or for-profit. As of summer 2014, there were 285 RHCs in California, the large majority of them either private practices or hospital-based programs. Of those, 120 were in the 28 expansion counties.

While both CHCs and RHCs in California are reimbursed via the Prospective Payment System (PPS) — a fixed, per-visit payment — there are differences between the two types of entities. For example, CHCs are required to provide a full range of primary and preventive care services. They must serve all ages and all residents of their service area regardless of insurance status or ability to pay, and have a sliding scale of charges. RHCs do not have minimum service requirements and generally do not see uninsured patients.

A 2011 DHCS study of Medi-Cal beneficiary health care access underscores the important role FQHC and RHC providers play in serving Medi-Cal beneficiaries in the 28 expansion counties. According to this study, in nearly half of these counties more than 50% of beneficiaries with medical claims had 70% or more of their visits at an FQHC or RHC. In three-quarters of the counties, more than 40% of Medi-Cal beneficiaries received 70% or more of their visits at an FQHC or RHC. (See Figure 2 on page 10.)

Finally, California Medical Board records show approximately 3,900 licensed physicians in the 28 expansion counties in 2011-12, although this figure does not necessarily reflect active physicians. This level of physician licensure has remained flat since 2007-08. (See Appendix C.)

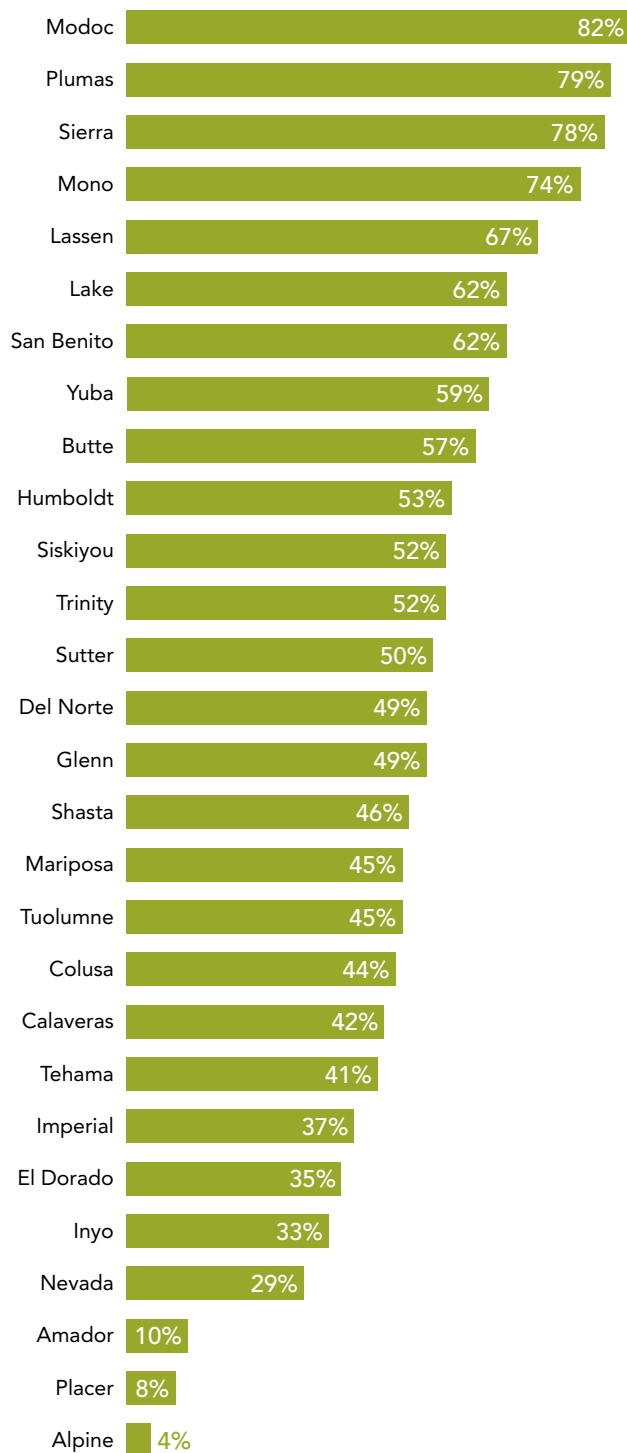
Table 3. Community Health Centers and Rural Health Clinics in Rural California, 2013-2014

HEALTH CENTER TYPE	NUMBER
Community Health Centers (CHC) in Rural/Frontier MSSAs	249
▶ Federally Qualified Health Centers (FQHC)	189
▶ FQHC Look-Alikes	14
▶ Community/Free Clinics	29
▶ Indian/Tribal Health Center Licensed Sites	17
95-210 Rural Health Clinics (RHC)	285
TOTAL*	510

*Total reflects that 24 clinics are simultaneously designated as CHCs and 95-210 RHCs.

Sources: California Primary Care Association, email communications, April 2014 and February 2015, citing OSHPD 2013 data; Centers for Medicare and Medicaid Services, CASPER Report 0006D, Name and Address Listing for Rural Health Clinics – California (August 2014).

Figure 2. Medi-Cal Beneficiaries* Receiving 70% or More of All Medical Services at FQHCs/RHCs, 28 Rural Expansion Counties, 2009



*Among those with claims.

Source: Department of Health Care Services, *Measuring Access to Medi-Cal Covered Healthcare Services: Physicians, Physician Groups, Clinics, and Hospital Emergency Departments*, September 2011.

Implementation of the Rural Expansion

Key informants for this report were interviewed in the late fall of 2013 and winter of 2014. Among questions asked were those soliciting their views about the implementation process for the new managed care program. These views provide a useful framework for understanding some of the difficulties associated with implementation and key issues needing attention as the rural expansion proceeds.

Initial Implementation Difficulties

DHCS set an ambitious timeline for the rural expansion. The initial “go-live” date for the expansion was June 1, 2013, less than one year after statutory authorization. Provider and county informants agreed that this timeline was unrealistic, given the procurement process required for the selection of health plans, associated planning and development, and the number of counties involved. DHCS released the Request for Applications for prospective plans in early November 2012, with the selected plans to be announced by the end of February 2013.⁸ Ultimately, the start date for the expansion was pushed back to September or November of 2013, depending on the county, to address various implementation issues.

In support of this process, DHCS held stakeholder meetings and community forums in five counties — Imperial, Mariposa, Sacramento, San Benito, and Shasta — between July and December 2012 and conducted several webinars in summer 2012 and spring 2013. Following the announcement of health plan contracts, the plans themselves organized dozens of community meetings during late 2013 and into 2014. Despite these activities, provider and county informants said that DHCS’s tight timeframe for selecting health plans and implementing the program resulted in a rushed process with limited opportunities in many expansion counties for active stakeholder involvement to address local issues and concerns.

Informants across the spectrum were also critical of the process used to inform Medi-Cal beneficiaries about the impending shift to managed care. DHCS reported that written notices were sent to each beneficiary at 90 days, 60 days, and 30 days prior to the beneficiary’s date of enrollment into managed care, and that the notices were prepared with stakeholder input. DHCS also reported

that phone calls were made to beneficiaries who had not selected a plan after the 30-day notice. However, some informants interviewed for this report asserted that this DHCS beneficiary education process was inadequate. First, informants reported that some of the information beneficiaries received from Health Care Options, contracted by DHCS to assist beneficiaries with plan selection, was incomplete or out-of-date, which created confusion for beneficiaries. Second, informants reported that DHCS notices to beneficiaries about the change to managed care were difficult for some beneficiaries to understand, and some notices went to the wrong people, which created additional beneficiary confusion.

Better Transition in Certain Counties

Informants reported that in certain counties the managed care rollout was less disruptive and better oriented to local needs. According to these interviewees, in Imperial County and in the seven northern counties where Partnership was selected as the sole health plan, local stakeholders had more opportunity to engage with the process and thereby to facilitate implementation and improve outcomes.

In the seven northern counties, these transition efforts grew from the work of a local health alliance of Shasta County providers and other stakeholders that began meeting after the passage of the ACA in 2010. The group came to the conclusion that managed care was inevitable with implementation of the ACA. As a consequence, the alliance initiated discussions with Partnership about bringing Medi-Cal managed care to the county. These initial contacts did not yield an agreement to proceed, but when DHCS proposed expansion of Medi-Cal managed care to rural counties, Shasta County stakeholders, including provider groups, reopened their discussions with Partnership.

After more than a year of collaborative work, Partnership, already approved for expansion into Lake County, determined that it would need seven contiguous counties to support an overall expansion of Medi-Cal managed care into this rural region. The collaborative ultimately obtained the support of the Boards of Supervisors of seven counties (Del Norte, Humboldt, Lake, Lassen, Modoc, Shasta, and Siskiyou) for Partnership to be their sole Medi-Cal managed care provider. DHCS initially held to its intent of having two health plans in each county but eventually accepted Partnership as the sole plan

after hearing from the county Boards of Supervisors, key legislators, local health care providers, and other stakeholders. Stakeholders in the seven counties now credit the trust built over several years of collaborative “pre-work” for the success of the managed care rollout there.

In Imperial County, a previously established health leadership group chaired by a local physician had been meeting to look at changes on the horizon, including meaningful use of electronic health records, health care reform under the ACA, and accountable care organizations. When DHCS announced its intention to implement the rural expansion, the local leadership group reached out to and incorporated a health care stakeholder group that included several dozen local physicians. This expanded group developed and recommended a Two-Plan Model to include an LI plan (a public, countywide plan) and a private plan, and the county Board of Supervisors endorsed the concept. A steering committee devised and implemented a process for selecting the LI plan, and several plans were considered. While the county ultimately concluded that development of an LI plan was not feasible in the near term and recommended that DHCS approve a single commercial plan, CHW, to serve the county, the local planning effort resulted in a managed care plan with broad-based support in the county. DHCS approved CHW and later added Molina Health Systems (Molina) as a second commercial plan to provide beneficiary choice.

Health Plan Standards for the Rural Expansion

All of the health plans participating in the rural managed care expansion have executed contracts with DHCS, and all of them are subject to DHCS regulatory oversight. In addition, Anthem, CHW, and Molina are licensed under the Knox-Keene Health Care Act and therefore are also subject to regulatory oversight by DMHC. As a COHS, Partnership is not a Knox-Keene plan and so is subject to DHCS but not DMHC regulation.

Nothing in Knox-Keene, in the enabling statutes for the expansion, or in the DHCS contract identifies unique circumstances or conditions associated with rural health care delivery that must be addressed as a part of health plan responsibilities for the rural managed care expansion. Rather, existing access and availability requirements concerning Medi-Cal managed care that were defined for more populated areas have been carried over and applied to the rural expansion counties. The remainder of

this section examines the early evidence on plans' adherence to DHCS and DMHC standards for provider access and availability of services, which are outlined in Table 4. Hereafter, the report highlights some of the difficulties

that plans have experienced in meeting these access and availability standards in certain counties.

Table 4. Provider Access and Availability Requirements for Medi-Cal Managed Care Plans

General Requirements	<ul style="list-style-type: none"> ▶ Each plan member has a primary care physician (PCP) who is available and physically present for sufficient time to ensure access. ▶ Members have access to specialists for all medically necessary services. ▶ Health care plan has a procedure to monitor waiting times in providers' offices and for telephone calls. ▶ Members are offered appointments for covered health care services within a time period appropriate for their condition..
Minimum Number of Providers	<ul style="list-style-type: none"> ▶ PCPs — ratio of 1:2,000* ▶ All physician providers — ratio of 1:1,200* ▶ Specialty care providers — ratio not specified; number subject to approval by DHCS and DMHC based on plan proposals to meet specialty care needs
Time/Distance Standards	<ul style="list-style-type: none"> ▶ PCPs — 10 miles/30 minutes[†] ▶ Specialty care providers — discretionary standard determined by DHCS/DMHC
Appointment Waiting Times	<ul style="list-style-type: none"> ▶ Emergency care —available in the service area 24 hours/day ▶ Urgent care: <ul style="list-style-type: none"> ▶ No prior authorization required — available within 48 hours ▶ Prior authorization required — available within 96 hours ▶ PCP (non-urgent) — available within 10 business days ▶ Ancillary services (non-urgent) — available within 15 business days ▶ Specialty care — available within 15 business days
Specialty Care	<ul style="list-style-type: none"> ▶ Members have access to specialty services in accordance with Title 28 CCR Section 1300.67.2: "Within each service area of a plan, basic health care services and specialized health care services shall be readily available and accessible to each of the plan's enrollees." ▶ Plan has procedures for: <ul style="list-style-type: none"> ▶ Member to receive a standing referral to a specialist if member needs continuing specialty care ▶ Member with a condition or disease that requires specialized medical care over a prolonged period of time to receive a referral to a specialist or specialty care center that has expertise in treating the condition or disease
Other Requirements	<ul style="list-style-type: none"> ▶ Appointment timeframes may be shortened or extended, as clinically appropriate, by a qualified health care professional and must be documented in the member's medical records. ▶ Plan shall arrange for a member to receive timely care as necessary for a health condition if timely appointments within the time and distance standards required are not available. ▶ Plan shall refer members to, or assist members in locating, available and accessible contracted providers in neighboring service areas for obtaining health care services in a timely manner appropriate for the member's needs. ▶ If services are not available in network, the plan must adequately and timely cover these services out of network for member.

*The ratio is one provider per general population figure within the plan area.

†Medi-Cal managed care plans are subject by contract to a stricter time and distance standard than required by Knox-Keene, which requires PCPs to be available within 15 miles/30 minutes of where enrollees work or reside. DMHC enforces the Medi-Cal standard for the Medi-Cal plans under its jurisdiction.

Source: Medi-Cal Managed Care COHS and Two-Plan contracts, Exhibit A, Attachments 6 (www.dhcs.ca.gov) and 9 (www.dhcs.ca.gov).

Assessment of Health Plan Readiness at Go-Live

For the rural expansion counties served by Partnership, the go-live date for the program was September 1, 2013. For counties served by other health plans, the rollout date was delayed until November 1, 2013. By these implementation dates, the health plans were required to have organized provider networks in place that included contracts with a sufficient number of key providers, including hospital, primary care, specialty care, and ancillary services.

Network approval involved both DHCS and DMHC, and both agencies approved the networks submitted by the plans as meeting required standards. DMHC's focus was review of the networks for licensure purposes and review of alternative standards of accessibility, as applicable. DHCS reviewed the networks to determine contract regulatory compliance and comparability to FFS access.⁹

Key informants were asked about the readiness of the provider networks and the overall system at the time of implementation. Informants from health plans stated that the provider networks were ready at the go-live date. Molina, which was not designated by DHCS as the second plan in Imperial County until late in the fall of 2013, reported that the network was "ready enough" to begin initial service delivery at the go-live date, with improvements expected over the first months of operation. Health plan informants stated they generally expected to see improvements in all of the networks over time as the plans reached out to providers who initially had declined to participate. DHCS informants shared this view. As discussed immediately below, however, provider and county informants were not as positive about network readiness.

Initial Shortcomings Identified by Providers and Counties

Provider and county informants were somewhat more critical than the health plans and DHCS about the readiness of provider networks at the time of implementation. These informants suggested that provider networks "were a work in progress," particularly with regard to specialty care. On this key point, health plan informants acknowledged that access to specialty care providers, depending on the provider type and county, was a continuing challenge because of the limited number of these providers in rural counties.

In particular, provider and county informants reported the following concerns about initial network readiness:

- ▶ Provider networks were not fully worked out; many contracts were still in development.
- ▶ In various instances, patient assignments to contracting PCPs were being made by the plans without regard to actual availability of those local providers for all the patients assigned.
- ▶ Delays in health plan contracting with county-operated clinics created service delays and the need for clinics to submit repeated authorization requests for patients who had long been in their care.
- ▶ Specialty care presented manifold problems: many specialty care providers chose to limit the number of new Medi-Cal patients, travel times to contracted specialty providers presented a new barrier for some patients, and health plans referred patients out-of-county for certain specialty care consults, often requiring a wait of several months.
- ▶ Because of a lack of contracted specialists, one health plan encouraged PCPs to "find the specialist" they wanted their patient to see; the plan would then attempt to execute a contract with that provider.
- ▶ Because of new health plan requirements and plan changes to drug formularies, PCPs spent a lot of additional time getting prior authorizations for specialty care and prescription drugs, and there were new challenges in obtaining coverage for non-formulary medications.
- ▶ Hospitals had difficulties with prior authorization processes, including hospital transfer authorizations, and with the process for billing for services provided under treatment authorization requests previously approved by Medi-Cal.
- ▶ Mental health provider networks were not ready, and the role of plans versus county mental health programs was unclear.

Many of the issues identified by these informants could be expected with a transition to a new health care delivery system — the movement from FFS Medi-Cal to managed care operated by four different health plans across 28 counties presented a massive planning and

logistical challenge. In the present case, though, provider and county informants felt that many of these problems could have been mitigated by better DHCS planning and communication, by additional work with local stakeholders, and by a longer lead time before implementation.

Specific Contracting Challenges Identified in Some Regional Model Counties

Some provider informants reported that certain providers in the 18 counties served by Anthem and CHW, particularly hospitals and specialty providers, experienced difficulties with the execution of provider contracts. Some of these difficulties reportedly stemmed from the lack of time plans had to engage providers while others were the result of differing expectations about payment rates.

Provider and county informants reported that some specialty providers already participating in Anthem did not understand that they were now included in the Medi-Cal network by virtue of an “all-products” provision in their existing Anthem contracts, which required them to provide care to enrollees in any of Anthem’s products. Typically, providers can terminate their entire relationship with a health plan if they do not want to accept a new business arrangement via an all-products clause, but they cannot reject only a specific new product or program. A number of these Anthem providers reportedly responded to this contractual difficulty by accepting the new contract terms but then limiting the number of Medi-Cal referrals they accepted.

Provider informants also reported that payment rates, particularly for specialty care, were a continuing concern in the Regional Model counties. Even where health plans in those counties offered rates higher than traditional FFS rates, some participating providers limited the number of Medi-Cal plan patients they accepted. As one informant stated, “A specialist can say they will participate. That doesn’t mean full access to that specialist.” That is, specialists may contract with a plan but then limit the number of referrals they will accept under the plan, whether because of rates or other reasons.

Health Plan Networks Approved by the State

To understand the overall composition of health plan networks approved by DHCS and DMHC in the fall of 2013, research for this report included a review of selected health plan network submissions approved by DHCS

and DMHC, along with information posted by the health plans on their websites. These submissions to DHCS and DMHC provided information on each health plan’s contracted primary care, hospital, and specialty care providers. All of the health plans provide this information to DHCS as a contractual requirement. Also, Knox-Keene-licensed plans file certain of these reports with DMHC by March of each year as part of their annual timely access reporting.

The health plan–reported data provided by DMHC for this review had certain limitations. In particular, the data did not follow a single format. For example, data from DMHC on Anthem was aggregated and did not clearly delineate Medi-Cal business versus other lines of business or clearly present the data by county for the 19 counties in which it was doing Medi-Cal business. For the other health plans, DMHC data was disaggregated and provided a clearer picture of the networks at the county level.

The health plan submissions to DHCS followed a more consistent format. Accordingly, the analysis that follows relies primarily on the DHCS data and on information collected from the health plans’ websites regarding provider availability. This information is supplemented by data the plans provided to DMHC, where available and applicable.

Primary Care and Hospital Care Access

As shown in Table 5, above, DHCS’s contracts with Medi-Cal managed care plans establish specific time and distance standards that the plans must meet for access to PCPs and hospital care. Overall, health plan reporting to DHCS and DMHC in the fall of 2013 showed mixed results by the plans in meeting the PCP access standard of at least one provider within 10 miles and 30 minutes driving time in the rural expansion counties. In summary:

- ▶ Partnership reported that it could meet the 10-mile and 30-minute PCP standards for the majority of Medi-Cal beneficiaries served in its eight expansion counties, except for beneficiaries in certain Zip Codes in Del Norte, Humboldt, Modoc, Shasta, Siskiyou, and Trinity Counties, and nearly all beneficiaries in Lassen County.
- ▶ Anthem reported that it could only meet the 10-mile PCP standard for roughly half of the beneficiaries in the 19 rural counties it served. Anthem could not meet this standard for most beneficiaries in the

counties of Colusa, El Dorado, Inyo, Mono, Nevada, Plumas, Sierra, and Tehama. However, Anthem reported that most beneficiaries could access a PCP within 11 to 20 miles, excluding those in Inyo, Mono, Nevada, Plumas, and Sierra Counties, for whom travel distances would be considerably greater. Anthem reported that it could meet the 30-minute standard for most beneficiaries, except those in Mono, Nevada, Plumas, and Sierra Counties.

- ▶ CHW reported that it could meet the 10-mile PCP standard for most beneficiaries in the 19 counties it served, except for small portions of each county and for 40% or more of beneficiaries in the counties of Amador, Inyo, Mono, and Plumas. CHW reported that it could meet the 30-minute standard for most beneficiaries, except for parts of Inyo and Mono Counties.
- ▶ Molina reported no problems meeting the 10-mile and 30-minute PCP standards in Imperial County, except for small populations in the northern areas of the county.

With respect to the hospital-access standard of 15 miles and 30 minutes, health plans could meet the requirement for the most part but reported some problem areas, including:

- ▶ CHW identified alternative hospital-access standards for parts of most counties, ranging from 60/60 (miles/minutes) to 150/150, depending on the county. For Mono, Nevada, Sutter, and Tehama Counties, CHW identified countywide alternative standards.
- ▶ Partnership identified no problems with the hospital care access standard for Del Norte and Lake Counties, but identified problems meeting the standard for certain Zip Codes in its other six expansion counties.
- ▶ In the DHCS records concerning Molina, there was no documentation of an alternative standard for hospital care, but the network data Molina provided showed small populations in the northern part of Imperial County for which Molina's network hospital did not meet the 30-minute standard.
- ▶ Information on Anthem's hospital coverage provided by DHCS and DMHC for this review did not allow for evaluation of whether Anthem's hospital network meets the access standard, but Anthem did identify

hospital contracts in place across the range of its 19 expansion counties.

Specialty Care Access

There are no uniform state-mandated time and distance standards for specialty care services. Instead, the DHCS contract states generally that, "Contractor shall maintain adequate numbers and types of specialists within their network to accommodate the need for specialty care." The contract references existing law and regulations, which define adequacy as "adequate numbers of specialists and subspecialists to provide access to preventive and managed health care services to . . . members."¹⁰ In addition, health plans are required to "maintain an updated, accurate, and accessible listing of a provider's ability to accept new patients and . . . [to] make it available to enrollees, at a minimum, by phone, written material, and Internet Web site."¹¹

In light of the broad definition of what constitutes adequacy of specialty care access, the determination of adequacy in any specific county and specialty is generally left to the health plans, with the state regulator, either DHCS or DMHC, accepting or rejecting a plan's proposed standard. DHCS reported that the basic metric it used to determine specialty care adequacy for each new health plan's network was the level of availability that previously existed under FFS Medi-Cal. To make this determination, both DHCS and DMHC reviewed plan networks for the expansion counties. Plans were required to submit geographic access mapping and to demonstrate their ability to contract with out-of-network providers for any of 16 core specialties not in their network. If these conditions were met, the network was approved as adequate.

Specialty Care Provider Access in Summer 2014

To get a snapshot of specialty care access under the rural expansion about 10 months into the program, research for this report included review of selected specialty provider availability as posted on the websites of the participating health plans. For illustrative purposes, the review focused on 6 of the 16 "core specialties" identified by DHCS: cardiology, gastroenterology, neurology, orthopedic surgery, otolaryngology (ENT), and urology. (For detailed data regarding these six specialties under each plan in the 28 expansion counties, see Appendix E.) Because distances to health care providers in rural areas can be long, particularly for specialty care, a standard of

50 miles was used to determine relative availability of these six specialties in the Regional Model counties and in Imperial County, while a different standard was used for counties served by Partnership, as described below.

Health plan networks for specialties beyond these six may be more or less robust, depending on the county and health plan involved. For example, notwithstanding a comparably robust level of participation in these six specialties, CHW identified alternative time and distance standards for other specialties and for parts of most of the counties it serves.

Regional Model Counties

In the Regional Model two-plan counties, the data show that the number of contracting providers offered by CHW in the six high-need specialties is substantially more robust than that offered by Anthem. For the selected specialties, a CHW-contracted specialty provider is not available within 50 miles of the county border only 6% (7/108) of the time. In contrast, an Anthem-contracted specialty provider is not available within that distance nearly 60% (62/108) of the time. (See Appendix E.)

In its filing with DHCS, Anthem reported on strategies to compensate for its specialty care provider shortfalls. In addition to its provider contracts, Anthem stated that it operates an Access to Care Unit designed to assist beneficiaries locate not only in-network specialty care but also out-of-network care when in-network care is not reasonably available. According to Anthem, this unit is tasked with locating appropriate out-of-network specialty providers as needed, negotiating reimbursement terms, assisting in scheduling an appointment for the beneficiary, and coordinating transportation if necessary to ensure that beneficiaries have access to needed specialty services. Anthem stated that it developed this unit because providers are often unwilling to contract for a small volume of patients and prefer to accept referrals on a case-by-case basis in anticipation of higher rates.

While Anthem's Access to Care Unit may be effective in promoting access to specialty care, the absence of contracting providers for specialty services formally listed on the Anthem website leaves Medi-Cal beneficiaries, and the PCPs caring for them, with limited information about the specialty care options available through the plan. Further, it is not clear how DMHC or DHCS monitors this type of arrangement to assure network specialist adequacy.

Reported Specialist Provider Availability Is Not the Same as Actual Availability

The data posted on the health plan websites for the six high-need specialties — the source for the analysis above and in Appendix E — were comparable, but not identical, to the data the health plans reported to DHCS in the fall of 2013 in preparation for implementation. In some instances, the availability of providers in these specialties appeared greater in the later website data than in the fall 2013 submissions to DHCS. In other instances, it was less than described in those submissions.

However, while the posted networks show contracted providers, they do not reflect the willingness of those providers to take new patients. The willingness of providers to participate became even more important when the two Regional Model health plans serving 19 counties expanded to cover roughly 24,000 seniors and persons with disabilities as of December 1, 2014.

The provider finder function on the Anthem, CHW, and Molina websites can show whether a provider is "taking new patients." However, the reliability of this information depends on whether the provider keeps this information current with the health plan and whether the health plan updates its website with sufficient frequency. A spot check made for this report found that the number of contracted network providers listed on the plan websites as taking new patients was frequently less than the overall number of contracted providers. Moreover, the listing of a specialist as taking new patients did not guarantee that the provider was actually still doing so.

The health plans are required by statute to "maintain an updated, accurate, and accessible listing of a provider's ability to accept new patients and shall make it available to enrollees, at a minimum, by phone, written material, and Internet Web site." Timely and regular website updates will be important for plans to meet legal requirements and to accurately inform beneficiaries and their providers about the true state of their care options, including specialty care.

Partnership Counties

The Partnership website does not allow a user to judge the distance of a provider from a beneficiary's home, so it is not possible to determine how many providers are within 50 miles of each county. As a result, the assessment for Partnership counties is of reported specialty care availability *within* each county. For the eight expansion counties served by Partnership, the data show that access to the six specialties is most widely available in Humboldt, Mendocino, and Shasta Counties, with more limited access in the other counties. (See Appendix E.)

Depending on the beneficiary's county of residence, obtaining needed specialty care often involves significant driving distance and time. For the six specialties in the eight counties served by Partnership, specialty providers were not available anywhere in the county nearly 60% (28/48) of the time.

To address specialty care needs in counties with limited access, Partnership reported that it recently initiated a number of local efforts to promote greater access. These include an Innovations Grant program to provide funding for local provider network development and support for provider recruitment in counties with the most significant shortages of primary care and specialty care providers.¹²

Imperial County

Availability for the six high-need specialty providers in Imperial County reported by CHW and Molina shows comparability between the two plans. (See Appendix E.) For only one of the six specialties (ENT) did Molina not offer a provider within 50 miles of the county; the nearest was 70 miles away. CHW offered at least one provider within 50 miles in each specialty category.

Other Matters Affecting Access to Care

In addition to the number and distribution of providers, several other aspects of managed care take on particular importance in rural areas. These include standards concerning transportation, telehealth, and grievances and appeals. As with provider networks, the DHCS standards for these matters are the same for plans operating in the rural expansion counties as for those serving urban and suburban counties.

Transportation

Access to transportation services is critical for rural residents, where distances to sites of care are great, public transport is scarce, and transportation options for low-income beneficiaries are limited. In interviews in late 2013, senior DHCS officials indicated an understanding that access and transportation barriers can be more significant in rural areas, and suggested that health plans therefore have a stronger obligation to ensure that beneficiaries can reach providers who offer the covered benefits. However, nothing in Medi-Cal statutes or regulations or in the DHCS contract with health plans establishes a "stronger obligation" on health plans to provide transportation support for rural Medi-Cal beneficiaries.

For adults, Medi-Cal regulations define covered medical transportation as ambulance, litter van, and wheelchair van services, which are to be provided "when the beneficiary's medical and physical condition is such that transport by ordinary means of public or private conveyance is medically contraindicated, and transportation is required for the purpose of obtaining needed medical care."¹³ The regulations also state that any nonemergency medical transportation necessary to obtain covered services requires a physician's, dentist's, or podiatrist's prescription, plus prior authorization, except when it involves transfer of the patient from an inpatient hospital to a skilled nursing facility. Both nonemergency medical transportation and nonmedical transportation are covered benefits under the Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) program for children enrolled in Medi-Cal.

The DHCS Medi-Cal managed care contract requires health plans to describe coverage of both medical and nonmedical transportation services in their member services guide, specifically:

- ▶ A description of both medical and nonmedical transportation services
- ▶ Procedures for obtaining any transportation services offered by the plan or available through the Medi-Cal program
- ▶ The conditions under which nonmedical transportation is available¹⁴

Research on plan coverage for nonemergency medical transportation offered by the participating health plans

was conducted through a review of member guides and other information provided on the health plan websites in late summer 2014. Overall, while discussion of coverage for nonemergency medical transportation services varied by health plan, none of the plans' policies indicated that transportation support is provided to assist beneficiaries to get to regular medical or specialty care appointments, even those that require long travel distances or times. Legal services informants reported confusion among beneficiaries about the availability and extent of transportation coverage, particularly in the Regional Model counties.

In describing the availability of nonemergency transportation, the plans generally gave vague and sometimes contradictory information. For example, Anthem's member services guide stated that it will approve non-emergency transportation when it is "medically necessary" and a provider asks for the service, but elsewhere stated, "We will approve a ride for you as long as the request is for a medical service. We do not cover public transport, such as airplane, car, or taxi rides, unless it involves transport to a kidney transplant center that is outside the service area."¹⁵ In its filing with DHCS, Anthem also noted that it "will coordinate transportation if necessary to ensure members are able to access needed primary care and other medically necessary services." However, evidence of plan coverage for this transportation support was not apparent from available public documents.

CHW's website stated that nonemergency medical transportation must be approved by both the plan and the patient's PCP, and lists criteria "to get medically necessary health care services" and "when it is not medically advisable for you to use a public or private vehicle." Elsewhere, the site said, "Information on nonemergency transportation will be posted soon."¹⁶

Partnership's website included a one-page document that described emergency transport, nonemergency transport, and a supplemental transport benefit. Nonemergency transport required prior approval, while the supplemental benefit would be provided when the beneficiary does not meet the criteria for Medi-Cal-covered transportation and the beneficiary is "considered high risk" due to a medical condition that makes transportation "critical to the well-being of the member and/or fetus."¹⁷

Molina's website stated that doctor-prescribed nonemergency medical transportation is covered when a medical condition "does not allow" regular means of transportation. Molina also covers nonmedical transportation if a beneficiary is recovering from a "serious injury or medical procedure" that prevents them from driving to a medical appointment and no other transportation is available.¹⁸

None of the referenced health plan terms and conditions indicated that transportation support is provided to assist beneficiaries to get to regular medical or specialty appointments, or how to address barriers to access resulting from long travel distances or times and a lack of transportation options. Further, none offered beneficiaries clear information about procedures for requesting transportation assistance. In follow-up discussion, DHCS confirmed that there are no transportation requirements on the health plans serving the expansion counties beyond those specified in the global reference to the state regulations, as quoted above.

DHCS reported in December 2014 that it had recently surveyed the health plans to assess the status of transportation access, particularly in rural counties, and found that all of the plans polled either have a nonemergency medical transportation network in place or are developing contracts for such a network. Additionally, all plans polled have processes in place to evaluate their beneficiaries' needs for transportation services. However, DHCS did not provide plan-specific information on this topic.¹⁹

In sum, based on the information publicly available, it appears that coverage for nonemergency medical transportation is potentially available from each health plan based on medical necessity or other plan criteria, but beneficiary access to this information and awareness of the coverage appear to be limited.

Telehealth

An area of promise for the delivery of specialty care in rural and remote areas is telehealth services, which involve the delivery of care, including diagnosis, consultation, and treatment, through telecommunications technologies. The DHCS managed care contract with the health plans authorizes delivery of telehealth services but does not require it, and to date the health plans serving the expansion counties have incorporated telehealth services only to a very limited extent.

Of the contracting plans, Anthem has presented the most defined telehealth strategy. According to Anthem's compliance report to DMHC, the plan's telehealth program has 62 primary care presentation sites across California where the patient can connect to a remote specialist via telecommunication. Of these 62 presentation sites, 21 are in provider offices in the rural counties of Butte, Colusa, Glenn, Imperial, Nevada, Plumas, Sierra, Tehama, and Yuba.

Partnership has a small number of telehealth services available, including dermatology, ophthalmology, and optometry services, and is working with providers to add

more specialty care telehealth services.²⁰ For example, Partnership recently initiated development of three telemedicine sites in Humboldt, Lassen, and Shasta Counties focused on care for hepatitis-C and on endocrinology.

The other health plans have not yet introduced telehealth services, and plan materials submitted to DHCS were vague about their intent to do so. CHW reported that it is exploring options regarding telehealth in the expansion counties it serves. Molina stated that telehealth initiatives had not been needed with its prior book of Medi-Cal business. However, with Molina's entry into Imperial County and the beginning of the Cal

New Behavioral Health Coverage

New Mental Health Responsibilities. Beginning January 1, 2014, all Medi-Cal managed care plans were given new responsibility for providing mental health services to Medi-Cal enrollees with "mild to moderate" mental health conditions. County Mental Health Plans (MHP) continue to be responsible for Medi-Cal beneficiaries with serious mental illness.

Provider and county informants expressed concern about the separation of responsibility between health plans and counties for delivery of mental health services and the coordination required to make this work. "What has not been fully recognized is the movement of people across the continuum of mental illness and the fact that patients can't be pigeonholed into one diagnosis of mild, moderate, or severe," said one provider informant.

The roles and responsibilities of mental health providers at the county level are defined in a memorandum of understanding (MOU) between each participating health plan and each county in which it operates. Beyond these MOUs, health plans and counties will need to build business and clinical relationships around the provision of care in order to address the unique care needs of persons with mental illness.

In many of the 28 expansion counties, community health centers provide mental health services to Medi-Cal beneficiaries either independently or under contract with the county. With health plans now required to deliver the expanded Medi-Cal mental health benefit, they will need to coordinate closely with these community health centers in the delivery of services, particularly where the county infrastructure to address severely mentally ill Medi-Cal beneficiaries is most

limited. A variety of issues will need to be addressed regarding the continuing mental health service role for community health centers, including payment structures and how health centers fit within the MOUs between health plans and counties.

New Medi-Cal Substance Use Disorder Benefit. An expansion of Medi-Cal coverage for Substance Use Disorders (SUD) was approved as a part of the FY 2013-14 State Budget and will affect the managed care health plans in the rural expansion. Beginning January 1, 2014, all Medi-Cal beneficiaries are entitled to screening, brief intervention, and referral to treatment (SBIRT) for addiction; intensive outpatient treatment; residential treatment; and inpatient detoxification. Among these services, Medi-Cal managed care plans have responsibility only for SBIRT and will refer beneficiaries to county SUD programs for additional services.

In most of the 28 expansion counties, there is very limited SUD treatment capacity, particularly for residential treatment. In general, rural counties do not have many Drug Medi-Cal Treatment Program providers and have experienced a low state investment in SUD treatment services. For example, of approximately \$131 million allocated in FY 2011-12 under the Drug Medi-Cal Treatment Program, the 28 rural counties received roughly \$7 million, or 5.3%.²¹

DHCS is developing a federal Medicaid Rehabilitation Waiver for the delivery of SUD services. To the extent this waiver supports rural provider expansion efforts, including opportunities to regionalize service delivery across several counties, there may be an opportunity to expand the existing small investment in this type of care in the 28 counties.

MediConnect program (California/federal partnership to provide coordinated care to Medi-Cal/Medicare dual eligibles) in several of its service areas, the plan “will look for opportunities” to utilize telehealth.

Appeals and Grievances

Medi-Cal beneficiaries’ ability to file grievances and appeals concerning benefit coverage or other matters is essential to assuring effective review and oversight of plan decisions. The DHCS contract requires health plans to establish procedures for beneficiaries to file a grievance or appeal with the plan, either in writing, in person, or by phone. This includes appealing decisions regarding the beneficiary’s coverage, benefits, relationship to the health plan, or other matters of dissatisfaction. Explanations of these procedures are to be included in the plan’s membership guide provided to the beneficiary.

Further, the contract and DMHC regulations describe the rights of beneficiaries concerning appeals of plan decisions about medical services. In the Regional Model counties, where the plans are Knox-Keene licensed and thus regulated by DMHC, beneficiary rights include (1) requesting an Independent Medical Review (IMR) from DMHC, which involves a clinician decisionmaker, and (2) requesting a State Fair Hearing from DHCS if dissatisfied with the IMR decision. The State Fair Hearing process generally takes considerably longer than an IMR, according to legal aid informants, and does not include a clinician decisionmaker. Beneficiaries enrolled in Partnership, which is a COHS not licensed under Knox-Keene or regulated by DMHC, may only request a State Fair Hearing from DHCS. Thus, depending on their location, Medi-Cal beneficiaries across the rural expansion counties may have different appeal protections.

DHCS has reported that it will assess grievance and appeal data as a part of its consideration of health plan performance. Legal services representatives reported that the grievances and appeals filed with the state represent only a small fraction of the numerous issues beneficiaries and their representatives address locally. This is due in large part to the need of beneficiaries and their representatives to resolve immediate health-related issues that cannot wait for a protracted appeal process. In light of this dynamic, additional information about the beneficiary experience in the rural managed care expansion would provide greater context for aggregated reporting on beneficiary grievances and appeals. To this end, DHCS has said that it conducted a baseline member

satisfaction survey among Medi-Cal beneficiaries in rural counties prior to implementing the managed care expansion, and will repeat that survey 18 months later, in spring 2015.²²

Rural Expansion Going Forward

State Monitoring of the Expansion

With the delegation of responsibility to health plans for delivery of health care services to Medi-Cal beneficiaries in the 28 rural expansion counties, the role of the state has evolved from a direct payer of care to one of contracting with health plans, monitoring their performance and holding them accountable, and providing leadership to address issues facing rural health care access. As one provider informant for this report said, “If the state wants to get out of the business of health care and contract with health plans, the state needs to monitor the delivery of care. The state’s role is to assure that the health plans have adequate networks.” According to DHCS, that is the state’s intention, and the state’s joint agency oversight will incorporate a variety of qualitative and quantitative methods. (See sidebar on page 21.)

Under the terms of the state’s Medicaid waiver, DHCS has been reporting to the federal government on the status of the rural expansion since implementation in late 2013. This reporting has focused on: enrollment; beneficiaries assigned to a PCP and those who change a PCP; beneficiaries who change a plan due to access to care or continuity of care concerns; additions and deletions from the provider network; continuity of care requests and outcomes; health plan call summaries; grievance reporting; and calls to the Office of the Ombudsman. In preparing this report, a request was made to DHCS for copies of the information submitted to the federal government, but this request was denied.

DHCS made its first public report on the status of the rural managed care expansion in December 2014 at a meeting of the department’s Stakeholder Advisory Committee. The report was a summary discussion of experience to date and presented only enrollment data. Results of the comprehensive interagency monitoring of the rural expansion (see sidebar on page 21) were not yet available for a formal report on plan performance.

DHCS and DMHC Health Plan Assessment and Monitoring

DHCS Medical Audits. Performed by the Audits and Investigations Division, Medical Review Branch; conducted annually beginning in 2015; address utilization management, care coordination, access to care, members rights / quality management, administrative capacity

DMHC Routine Medical Surveys. Performed by DMHC; conducted at least every three years; address quality management, member complaints, access and availability, referrals and authorizations, overall plan performance

DHCS and DMHC Interagency Agreements. Coordinated joint agency review of rural expansion (as well as other transitions); includes financial audit, network adequacy, and medical survey

DHCS and DMHC Audit and Survey Coordination. Coordinated audit schedule with teams from both agencies onsite concurrently; findings consolidated in the Corrective Action Plan process (see below)

Non-routine Audits and Surveys. Other reviews as needed

Corrective Action Plans. Administered by DHCS for DHCS Medical Audits, Interagency Agreement surveys, and other unscheduled audits or surveys

Other monitoring indicators for rural expansion:

Transition Data. Grievance reports, continuity-of-care reports, provider network additions and deletions, PCP assignment and changes, consumer satisfaction, fraud and abuse

Ongoing Data. All-member grievance reports, detailed provider network reports, continuity-of-care reports, grievance logs, geo access reports, out-of-network reports, network adequacy reports

Source: "Network Assessments and Monitoring," Sarah C. Brooks and Nathan Nau (DHCS) and Nancy Pheng Street (DMHC), presentation to DHCS Stakeholder Advisory Group, September 11, 2014.

Staff from both agencies repeated their commitment to conducting coordinated reviews of plan performance and beneficiary experience, including the post-expansion beneficiary survey.²³

More than a year into the rural managed care expansion, summary reporting on the new program is helpful, but it offers little description of the range of experiences across the 28 rural expansion counties. Further, in the absence of more detailed reporting, continuing issues of restricted health care access experienced in many rural counties are at risk of being overlooked at the state level. Most key informants interviewed for this report expressed a desire for a more collaborative, transparent, ongoing process with DHCS to discuss and consider findings associated with the managed care expansion as they occur, and to focus on actual beneficiary and provider experiences.

State Opportunities for Ongoing Leadership

Going forward with the rural Medi-Cal managed care program, DHCS has the opportunity to demonstrate leadership in two areas: monitoring and enforcement of health plan performance, and affirmative efforts to address the underlying challenges with rural Medi-Cal provider access.

With respect to monitoring and enforcement, DHCS and its partner agency DMHC should utilize available information to report regularly and specifically about the rural managed care program in each of the 28 expansion counties. DHCS and DMHC should consider including the following matters:

- ▶ Specific information about the composition and other aspects of the provider networks that DHCS and DMHC have approved for the health plans serving the 28 expansion counties
- ▶ Specialty care access standards accepted for each plan
- ▶ Alternative network standards that DHCS and DMHC have approved for the health plans and the justification for approving them
- ▶ Specific steps by DHCS and DMHC to monitor network standards and address deficiencies with each participating plan

- ▶ Within the context of nonemergency and non-medical transportation provided by health plans, clear documentation of plan services and criteria, and of processes for beneficiary use of these services
- ▶ Reporting of grievance and appeal filings with DHCS and DMHC at a county and plan level
- ▶ DHCS efforts to document the beneficiary and provider experience under the new program, including any DHCS plans to obtain rural health stakeholder feedback through county site visits and surveys of consumer and provider satisfaction
- ▶ Steps by DHCS to promote growth of specialty care provider capacity across the 28 expansion counties, including the use of telehealth services

With respect to the underlying challenges of rural Medi-Cal provider access, DHCS can demonstrate renewed leadership for rural health in partnership with the health plans now carrying out state responsibilities and with providers, beneficiaries, counties, and other community stakeholders. This state leadership could produce long-term strategic goals for improved provider access and availability and necessary community supports for Medi-Cal beneficiaries in the 28 rural expansion counties, and define specific state policy, program, and financing approaches to achieve those goals. In its December 2014 presentation on the rural expansion, DHCS identified the state's next Medicaid waiver as a vehicle through which to consider rural workforce issues. DHCS has the opportunity to use this Medicaid waiver to lay out a strategic plan for rural health that focuses on the health care services and supports needed by all Medi-Cal beneficiaries.

Finally, the Legislature itself, particularly the Committee on Budget, which authored AB 1467, should give renewed attention to the rural managed care expansion in order to learn more about how this important programmatic change is working and to fulfill its essential oversight role. The timing for renewed legislative attention to the rural expansion could not be more important. Beginning December 1, 2014, roughly 24,000 seniors and persons with disabilities in the Regional Model two-plan counties began joining these health plans. (In the expansion counties served by Partnership, this population joined managed care at the outset.) These new entrants to managed care have higher-level needs, particularly for specialty care, than the first group of plan enrollees. DHCS, DMHC, and the health plans should be asked to report on network readiness for these populations and on their experience so far.

Moving from an FFS system to a more highly organized managed health care system, through Medi-Cal health plans, marks an important step toward improving rural health care delivery for Medi-Cal beneficiaries. But it is only a first step. Moving ahead, DHCS, DMHC, and the Legislature should focus on the key questions and issues that have been raised by rural health stakeholders, many of which are identified in this report, and develop the next level of improvement in rural health care delivery. Rural Californians and the rural health system need this affirmative state leadership.

Appendix A. List of Key Informants

ORGANIZATION	INFORMANT	TITLE
Providers		
Adventist Health	Gail Nickerson	Director, Rural Health Services
California Hospital Association	Peggy Wheeler Sherree Kruckenberg	Vice President, Rural Health & Governance Vice President, Behavioral Health
California Medical Association	Richard Thorp, MD	President
California Primary Care Association	Carmela Castellano-Garcia	President/CEO
Central Valley Health Network	Cathy Frey	CEO
Health Alliance of Northern California	Doreen Bradshaw	Executive Director
Hospital Council of Northern and Central California	Suzanne Ness	Regional Vice President
Shasta Community Health Center	Dean Germano	CEO
Western Sierra Medical Clinic	Scott McFarland	CEO
Health Plans		
Anthem Blue Cross	Steve Melody	President, California Medicaid Health Plan
California Health and Wellness Plan Centene Corporation	Greg Buchert, MD Wade Rakes	President/CEO Director of Business Development
Molina Medical	James Novello	COO
Partnership HealthPlan of California	Jack Horn	Executive Director/CEO
Consumers		
Health Access of California	Anthony Wright Beth Capell	Executive Director Lobbyist/Policy Advocate
Legal Services of Northern California	Liza Thantranon	Staff Attorney
Counties		
California Institute for Mental Health	Sandra Naylor Goodwin	President/CEO
CMSP Governing Board	Alison Kellen	Program Manager
Imperial County Public Health Department	Robin Hodgkin	Director
Plumas County Public Health Department	Mimi Hall	Director
Sutter County Human Services Department	Tom Sherry	Director
Tehama County Health Services Agency	Valerie Lucero	Executive Director
State Regulators		
California Department of Health Care Services	Toby Douglas Mary Cantwell Jane Ogle	Director Chief Deputy Director Chief Deputy Director
California Department of Health Care Services, Medi-Cal Managed Care Division	Javier Portela Sarah Brooks Karen Thalhammer	Plan Management Branch Chief Program Monitoring and Medical Management Branch Chief Policy and Contracts Branch Chief
California Department of Managed Health Care	Shelley Rouillard Katie Coyne Gary Baldwin	Director Deputy Director, Office of Plan Licensing Deputy Director, Plan and Provider Relations

Appendix B. State Ranking of Health Outcomes and Health Factors in the 28 Medi-Cal Rural Expansion Counties

COUNTY	HEALTH OUTCOMES* RANK OF 58 COUNTIES	HEALTH FACTORS† RANK OF 58 COUNTIES
Placer	2	2
El Dorado	7	9
Nevada	8	7
San Benito	10	28
Colusa	13	37
Mono	19	19
Tuolumne	21	21
Mariposa	24	25
Glenn	25	34
Imperial	27	55
Sutter	29	36
Calaveras	32	23
Amador	33	20
Plumas	34	32
Lassen	36	39
Humboldt	38	26
Sierra	39	27
Butte	45	33
Shasta	48	41
Trinity	49	46
Tehama	50	47
Inyo	51	22
Yuba	52	56
Modoc	53	29
Siskiyou	55	42
Del Norte	56	43
Lake	57	52
Alpine	NR	NR

*Health outcomes include length of life, health/mental health status, and birth outcomes.

†Health factors include health behaviors, clinical care, social and economic factors, and physical environment.

Source: "California Rankings Data," Robert Wood Johnson Foundation, www.countyhealthrankings.org; for ranking methodology, see www.countyhealthrankings.org/ranking-methods/ranking-system.

Appendix C. California Medical Board Physician Licenses in the 28 Medi-Cal Rural Expansion Counties

COUNTY	2007-08	2009-10	2011-12
Alpine	1	2	2
Amador	66	65	62
Butte	476	461	482
Calaveras	54	49	52
Colusa	9	10	9
Del Norte	48	44	40
El Dorado	303	288	293
Glenn	12	11	9
Humboldt	290	291	284
Imperial	127	129	136
Inyo	47	42	41
Lake	80	77	73
Lassen	37	37	37
Mariposa	16	11	13
Modoc	5	5	6
Mono	36	30	29
Nevada	258	303	246
Placer	966	947	1,104
Plumas	37	30	27
San Benito	43	43	40
Shasta	467	439	426
Sierra	0	0	0
Siskiyou	84	80	81
Sutter	201	196	192
Tehama	50	48	49
Trinity	14	9	8
Tuolumne	126	125	117
Yuba	53	41	43
Total	3,906	3,813	3,901

Source: "Physician and Surgeon License by County," California Medical Board, www.mbc.ca.gov.

Appendix D. Hospitals in the 28 Medi-Cal Rural Expansion Counties

COUNTY	HOSPITALS
Alpine	none
Amador	Sutter Amador Hospital
Butte	Adventist Health/Feather River Hospital Enloe Medical Center Orchard Hospital Oroville Hospital
Calaveras	Mark Twain St. Joseph's Hospital
Colusa	Colusa Regional Medical Center
Del Norte	Sutter Coast Hospital
El Dorado	Barton Memorial Hospital Marshall Medical Center
Glenn	Glenn Medical Center
Humboldt	Jerold Phelps Community Hospital Mad River Community Hospital Redwood Memorial Hospital St. Joseph Hospital
Imperial	El Centro Regional Medical Center Pioneers Memorial Health Care District
Inyo	Northern Inyo Hospital Southern Inyo Hospital
Lake	St. Helena Hospital Sutter Lakeside
Lassen	Banner Lassen Medical Center
Mariposa	John C. Fremont Healthcare District
Modoc	Modoc Medical Center Surprise Valley Health Care District

COUNTY	HOSPITALS
Mono	Mammoth Hospital
Nevada	Sierra Nevada Memorial Hospital Tahoe Forest Hospital District
Placer	Kaiser Permanente Roseville Medical Center Sutter Auburn Faith Hospital Sutter Roseville Medical Center
Plumas	Eastern Plumas Health Care Plumas District Hospital Seneca Healthcare District
San Benito	Hazel Hawkins Memorial Hospital
Shasta	Mayers Memorial Hospital District Mercy Medical Center Redding Shasta Regional Medical Center Vibra Hospital of Northern California
Sierra	none
Siskiyou	Fairchild Medical Center Mercy Medical Center Mount Shasta
Sutter	none
Tehama	St. Elizabeth Community Hospital
Trinity	Trinity Hospital
Tuolumne	Sonora Regional Medical Center/ Adventist Health
Yuba	Rideout Memorial Hospital

Sources: "List of Hospitals in California, USA," OSHPD, gis.oshpd.ca.gov; Hospital Council of Northern and Central California, email communication, May 30, 2014.

Appendix E. Availability of Providers in Six Core Specialties

The following three tables provide data obtained from the websites of the managed care health plans participating in the 28 rural expansion counties. They show the number of individual Board Certified providers for six core specialties for each of the counties served by the plans.

E1. California Health & Wellness Plan (CHW) and Anthem Blue Cross (AN) (providers within 50 miles of the county)

COUNTY*	CARDIOLOGY		GASTRO-ENTEROLOGY		NEUROLOGY		ORTHOPEDIC SURGERY		OTOLARYNGOLOGY (ENT)		UROLOGY	
	CHW	AN	CHW	AN	CHW	AN	CHW	AN	CHW	AN	CHW	AN
Alpine	6	0	1	0	1	0	>10	0	1	0	1	0
Amador	>10	>10	2	0	5	1	>10	1	4	0	5	0
Butte	>10	8	>10	8	9	5	>10	>10	7	6	8	3
Calaveras	8	0	3	0	5	0	>10	0	4	0	5	0
Colusa	>10	1	5	0	6	0	10	0	5	0	4	0
El Dorado	>10	>10	7	1	4	4	>10	8	5	1	3	0
Glenn	>10	0	7	0	5	0	>10	0	7	0	7	1
Inyo	1	5	1	0	0	0	0	1	0	0	0	0
Mariposa	2	0	4	0	3	0	6	0	2	0	3	0
Mono	0	0	0	0	1	0	4	1	0	0	1	0
Nevada	>10	>10	7	5	8	1	>10	>10	6	1	3	2
Placer	>10	8	6	7	8	8	>10	6	6	6	4	3
Plumas	4	0	3	1	1	1	7	2	3	0	2	0
Sierra	5	0	7	0	1	0	>10	0	3	0	3	0
Sutter	>10	>10	>10	3	8	1	>10	9	3	3	4	2
Tehama	>10	0	7	0	6	0	>10	0	8	1	6	0
Tuolumne	3	0	2	1	3	0	7	1	2	0	3	2
Yuba	>10	1	>10	1	>10	0	>10	0	9	0	8	0

E2. California Health & Wellness Plan (CHW) and Molina (MOL) (providers within 50 miles of the county)

COUNTY	CARDIOLOGY		GASTRO-ENTEROLOGY		NEUROLOGY		ORTHOPEDIC SURGERY		OTOLARYNGOLOGY (ENT)		UROLOGY	
	CHW	MOL	CHW	MOL	CHW	MOL	CHW	MOL	CHW	MOL	CHW	MOL
Imperial	4	8	5	7	1	4	2	1	5	0	3	2

*No review was conducted for San Benito County.

Note: If a specialty is listed as "0," beneficiaries in that county must travel more than 50 miles for these specialty care services.

Sources: "Find a Provider," California Health & Wellness, accessed August 22, 2014, www.cahealthwellness.com; "Provider Directory," Anthem Blue Cross, accessed August 23, 2014, www.anthem.com; California Health & Wellness and Anthem Blue Cross provider network filings to DHCS; "Find a Provider," Molina Healthcare, accessed August 26, 2014, portal.molinahealthcare.com.

Appendix E. Availability of Providers in Six Core Specialties, *continued*

E3. Partnership HealthPlan (providers within the county)

COUNTY	CARDIOLOGY	GASTROEN- TEROLOGY	NEUROLOGY	ORTHOPEDIC SURGERY	OTOLARYNGOLOGY (ENT)	UROLOGY
Del Norte	0	0	0	1	0	0
Humboldt	3	2	5	4	2	3
Lake	6	0	1	1	2	0
Lassen	0	0	0	0	0	0
Modoc	0	0	0	0	0	0
Shasta	>10	2	2	>10	5	3
Siskiyou	1	0	0	6	0	0
Trinity	1	0	0	0	0	0

Note: If a specialty is listed as "0", beneficiaries in the county must travel to another county for these specialty care services.

Source: Medi-Cal Specialist Directory, Partnership HealthPlan of California, www.partnershiphp.org.

Endnotes

1. As defined by the California Office of Statewide Health Planning & Development, a “frontier” Metropolitan Statistical Service Area (MSSA) is one with less than 11 people per square mile.
2. “Medi-Cal Managed Care Enrollment Report — July 2014,” California Department of Health Care Services, www.dhcs.ca.gov.
3. Carrie Graham, *In Transition: Seniors and Persons with Disabilities Reflect on Their Move to Medi-Cal Managed Care*, California HealthCare Foundation, April 2014, www.chcf.org.
4. California Health and Safety Code §1340 et seq.
5. California Department of Health Care Services, *28-County PowerPoint*, November 19, 2012.
6. Committee on Budget, Chapter 23, Statutes of 2012.
7. *HMOs and Rural California*, Office of the Legislative Analyst, August 8, 2002.
8. Medi-Cal Managed Care Regional Expansion Request for Applications (Number 28RFA2012/2013), California Department of Health Care Services.
9. Sarah Brooks, “Timely Access and Network Adequacy: Rural Expansion Counties” (presentation to the California Department of Health Care Services Stakeholder Advisory Committee, December 3, 2014), www.dhcs.ca.gov.
10. Title 22 CCR § 53853(a).
11. California Welfare and Institutions Code § 14182(c)(2).
12. Northern Region Outreach/Program Activities, Partnership HealthPlan, via email from Amy Turnipseed, Director of Policy and Program Development, October 15, 2014.
13. Title 22 CCR § 51323.
14. Two-Plan California Department of Health Care Services Contract (DHCS MMCD TwoPlanBoilerPlate-Web.6-1-11), p. 102.
15. *Medi-Cal Health Plan*, Anthem Blue Cross, July 2013, www22.anthem.com.
16. “Benefit Information,” California Health & Wellness, www.cahealthwellness.com; “Transportation Services,” California Health & Wellness, www.cahealthwellness.com.
17. “Transportation Coverage,” Partnership HealthPlan of California, www.partnershiphp.org.
18. “Transportation,” Molina Healthcare, www.molinahealthcare.com.
19. Personal communication from California Department of Health Care Services to author, December 9, 2014.
20. Partnership Rural Expansion GeoAccess Report to California Department of Health Care Services, p. 4.
21. “2012-13 Percent Allocations Based on 2011-12 Substance Abuse Subaccount Allocations,” California Department of Health Care Services, September 7, 2012.
22. “Rural Expansion Survey Questions,” accessed February 2, 2015, www.dhcs.ca.gov.
23. “Rural Expansion Survey Questions.”



County of Inyo



Health & Human Services - Behavioral Health

DEPARTMENTAL - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Meaghan McCamman

SUBJECT: Contract with North American Mental Health Services for the Provision of Telepsychiatry Services

RECOMMENDED ACTION:

Request Board approve the contract between the County of Inyo and North American Mental Health Services of Redding, CA for the provision of telepsychiatry services in an amount not to exceed \$163,000 for the period of January 1, 2021 through June 30, 2021, and authorize the Chairperson to sign, contingent upon all appropriate signatures being obtained.

SUMMARY/JUSTIFICATION:

In June 2020, after several years of trying to recruit an in-person psychiatrist, Inyo County HHS released an RFP to solicit bids from vendors to provide telepsychiatry services to clients of the Inyo County Specialty Mental Health Plan and Inyo County Jail. We received four responses and initiated a contract with Iris Telehealth of Austin Texas, unfortunately they have been unsuccessful in obtaining a clinician to provide the required services to meet our needs. It is with that we request your approval of a contract with North American Mental Health Services of Redding Ca. North American Mental Health Services scored well in the review of their RFP application and is currently providing services to multiple small California counties. It is our hope that between the two organizations we will increase our chances of securing a clinician to provide the much needed services to Inyo County residents.

This contract will be used to backfill the position of Dr. Jeanette Schneider, a long time Inyo County HHS employee who has been filling in as a retired annuitant during the recruitment process. Approval of this contract will ensure the Department is meeting the requirements as the Mental Health provider for the County.

BACKGROUND/HISTORY OF BOARD ACTIONS:

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

Your Board could choose not to approve this contract request which would likely extend the timeframe of locating a clinician.

OTHER AGENCY INVOLVEMENT:

None

FINANCING:

Mental Health Realignment and reimbursement will be pursued for all Medi-Cal eligible services provided. This expense is budgeted in Mental Health (045200) in Professional and Special Services (5265). No County General Funds.

ATTACHMENTS:

1. North American Mental Health Services Contract2020

APPROVALS:

Rhiannon Baker

Darcy Ellis

Meaghan McCamman

Melissa Best-Baker

Marilyn Mann

Marshall Rudolph

Amy Shepherd

Marilyn Mann

Created -

AGREEMENT BETWEEN COUNTY OF INYO

AND North American Mental Health Services
FOR THE PROVISION OF Telepsychiatry **SERVICES**

INTRODUCTION

WHEREAS, the County of Inyo (hereinafter referred to as "County") may have the need for the telepsychiatry services of North American Mental Health Services of Redding, CA (hereinafter referred to as "Contractor"), and in consideration of the mutual promises, covenants, terms, and conditions hereinafter contained, the parties hereby agree as follows:

TERMS AND CONDITIONS

1. SCOPE OF WORK.

The Contractor shall furnish to the County, upon its request, those services and work set forth in Attachment A, attached hereto and by reference incorporated herein. Requests by the County to the Contractor to perform under this Agreement will be made by Gail Zwier, Ph.D, whose title is: HHS Deputy Director of BH. Requests to the Contractor for work or services to be performed under this Agreement will be based upon the County's need for such services. The County makes no guarantee or warranty, of any nature, that any minimum level or amount of services or work will be requested of the Contractor by the County under this Agreement. County by this Agreement incurs no obligation or requirement to request from Contractor the performance of any services or work at all, even if County should have some need for such services or work during the term of this Agreement.

Services and work provided by the Contractor at the County's request under this Agreement will be performed in a manner consistent with the requirements and standards established by applicable federal, state, and County laws, ordinances, regulations, and resolutions. Such laws, ordinances, regulations, and resolutions include, but are not limited to, those which are referred to in this Agreement.

2. TERM.

The term of this Agreement shall be from January 1, 2021 to June 30, 2021 unless sooner terminated as provided below.

3. CONSIDERATION.

A. Compensation. County shall pay to Contractor in accordance with the Schedule of Fees (set forth as Attachment B) for the services and work described in Attachment A which are performed by Contractor at the County's request.

B. Travel and per diem. Contractor will not be paid or reimbursed for travel expenses or per diem which Contractor incurs in providing services and work requested by County under this Agreement.

C. No additional consideration. Except as expressly provided in this Agreement, Contractor shall not be entitled to, nor receive, from County, any additional consideration, compensation, salary, wages, or other type of remuneration for services rendered under this Agreement. Specifically, Contractor shall not be entitled, by virtue of this Agreement, to consideration in the form of overtime, health insurance benefits, retirement benefits, disability retirement benefits, sick leave, vacation time, paid holidays, or other paid leaves of absence of any type or kind whatsoever.

D. Limit upon amount payable under Agreement. The total sum of all payments made by the County to Contractor for services and work performed under this Agreement shall not exceed One hundred sixty three thousand Dollars

(\$ 163,000) (hereinafter referred to as "contract limit"). County expressly reserves the right to deny any payment or reimbursement requested by Contractor for services or work performed which is in excess of the contract limit.

E. Billing and payment. Contractor shall submit to the County, once a month, an itemized statement of all services and work described in Attachment A, which were done at the County's request. This statement will be submitted to the County not later than the fifth (5th) day of the month. The statement to be submitted will cover the period from the first (1st) day of the preceding month through and including the last day of the preceding month. This statement will identify the date on which the services and work were performed and describe the nature of the services and work which were performed on each day. Upon timely receipt of the statement by the fifth (5th) day of the month, County shall make payment to Contractor on the last day of the month.

F. Federal and State taxes.

(1) Except as provided in subparagraph (2) below, County will not withhold any federal or state income taxes or social security from any payments made by County to Contractor under the terms and conditions of this Agreement.

(2) County will withhold California State income taxes from payments made under this Agreement to non-California resident independent contractors when it is anticipated that total annual payments to Contractor under this Agreement will exceed one thousand four hundred ninety nine dollars (\$1,499.00).

(3) Except as set forth above, County has no obligation to withhold any taxes or payments from sums paid by County to Contractor under this Agreement. Payment of all taxes and other assessments on such sums is the sole responsibility of Contractor. County has no responsibility or liability for payment of Contractor's taxes or assessments.

(4) The total amounts paid by County to Contractor, and taxes withheld from payments to non-California residents, if any, will be reported annually to the Internal Revenue Service and the California State Franchise Tax Board. To facilitate this reporting, Contractor shall complete and submit to the County an Internal Revenue Service (IRS) Form W-9 upon executing this Agreement.

4. WORK SCHEDULE.

Contractor's obligation is to perform, in a timely manner, those services and work identified in Attachment A which are requested by the County. It is understood by Contractor that the performance of these services and work will require a varied schedule. Contractor will arrange his/her own schedule, but will coordinate with County to ensure that all services and work requested by County under this Agreement will be performed within the time frame set forth by County.

5. REQUIRED LICENSES, CERTIFICATES, AND PERMITS.

A. Any licenses, certificates, or permits required by the federal, state, county, municipal governments, for contractor to provide the services and work described in Attachment A must be procured by Contractor and be valid at the time Contractor enters into this Agreement or as otherwise may be required. Further, during the term of this Agreement, Contractor must maintain such licenses, certificates, and permits in full force and effect. Licenses, certificates, and permits may include, but are not limited to, driver's licenses, professional licenses or certificates, and business licenses. Such licenses, certificates, and permits will be procured and maintained in force by Contractor at no expense to the County. Contractor will provide County, upon execution of this Agreement, with evidence of current and valid licenses, certificates and permits which are required to perform the services identified in Attachment A. Where there is a dispute between Contractor and County as to what licenses, certificates, and permits are required to perform the services identified in Attachment A, County reserves the right to make such determinations for purposes of this Agreement.

B. Contractor warrants that it is not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in covered transactions by any federal department or agency. Contractor also warrants that it is not suspended or debarred from receiving federal funds as listed in the List of Parties Excluded from Federal Procurement or Non-procurement Programs issued by the General Services Administration available at: <http://www.sam.gov>.

6. OFFICE SPACE, SUPPLIES, EQUIPMENT, ET CETERA.

Contractor shall provide such office space, supplies, equipment, vehicles, reference materials, and telephone service as is necessary for Contractor to provide the services identified in Attachment A to this Agreement. County is not obligated to reimburse or pay Contractor, for any expense or cost incurred by Contractor in procuring or maintaining such items. Responsibility for the costs and expenses incurred by Contractor in providing and maintaining such items is the sole responsibility and obligation of Contractor.

7. COUNTY PROPERTY.

A. Personal Property of County. Any personal property such as, but not limited to, protective or safety devices, badges, identification cards, keys, etc. provided to Contractor by County pursuant to this Agreement are, and at the termination of this Agreement remain, the sole and exclusive property of County. Contractor will use reasonable care to protect, safeguard and maintain such items while they are in Contractor's possession. Contractor will be financially responsible for any loss or damage to such items, partial or total, which is the result of Contractor's negligence.

B. Products of Contractor's Work and Services. Any and all compositions, publications, plans, designs, specifications, blueprints, maps, formulas, processes, photographs, slides, video tapes, computer programs, computer disks, computer tapes, memory chips, soundtracks, audio recordings, films, audio-visual presentations, exhibits, reports, studies, works of art, inventions, patents, trademarks, copyrights, or intellectual properties of any kind which are created, produced, assembled, compiled by, or are the result, product, or manifestation of, Contractor's services or work under this Agreement are, and at the termination of this Agreement remain, the sole and exclusive property of the County. At the termination of the Agreement, Contractor will convey possession and title to all such properties to County.

8. INSURANCE.

For the duration of this Agreement Contractor shall procure and maintain insurance of the scope and amount specified in Attachment C and with the provisions specified in that attachment.

9. STATUS OF CONTRACTOR.

All acts of Contractor, its agents, officers, and employees, relating to the performance of this Agreement, shall be performed as independent contractors, and not as agents, officers, or employees of County. Contractor, by virtue of this Agreement, has no authority to bind or incur any obligation on behalf of County. Except as expressly provided in Attachment A, Contractor has no authority or responsibility to exercise any rights or power vested in the County. No agent, officer, or employee of the Contractor is to be considered an employee of County. It is understood by both Contractor and County that this Agreement shall not under any circumstances be construed or considered to create an employer-employee relationship or a joint venture. As an independent contractor:

A. Contractor shall determine the method, details, and means of performing the work and services to be provided by Contractor under this Agreement.

B. Contractor shall be responsible to County only for the requirements and results specified in this Agreement, and except as expressly provided in this Agreement, shall not be subjected to County's control with respect to the physical action or activities of Contractor in fulfillment of this Agreement.

C. Contractor, its agents, officers, and employees are, and at all times during the term of this Agreement shall, represent and conduct themselves as independent contractors, and not as employees of County.

10. DEFENSE AND INDEMNIFICATION.

Contractor shall hold harmless, defend and indemnify County and its officers, officials, employees and volunteers from and against any and all liability, loss, damage, expense, costs (including without limitation costs and fees of litigation) of every nature arising out of or in connection with Contractor's performance of work hereunder or its failure to comply with any of its obligations contained in the agreement, except such loss or damages which was caused by the sole negligence or willful misconduct of the County.

11. RECORDS AND AUDIT.

A. Records. Contractor shall prepare and maintain all records required by the various provisions of this Agreement, federal, state, county, municipal, ordinances, regulations, and directions. Contractor shall maintain these records for a minimum of four (4) years from the termination or completion of this Agreement. Contractor may fulfill its obligation to maintain records as required by this paragraph by substitute photographs, microphotographs, or other authentic reproduction of such records.

B. Inspections and Audits. Any authorized representative of County shall have access to any books, documents, papers, records, including, but not limited to, financial records of Contractor, which County determines to be pertinent to this Agreement, for the purposes of making audit, evaluation, examination, excerpts, and transcripts during the period such records are to be maintained by Contractor. Further, County has the right, at all reasonable times, to audit, inspect, or otherwise evaluate the work performed or being performed under this Agreement.

12. NONDISCRIMINATION.

During the performance of this Agreement, Contractor, its agents, officers, and employees shall not unlawfully discriminate in violation of any federal, state, or local law, against any employee, or applicant for employment, or person receiving services under this Agreement, because of race, religion, color, national origin, ancestry, physical handicap, medical condition, marital status, age, or sex. Contractor and its agents, officers, and employees shall comply with the provisions of the Fair Employment and Housing Act (Government Code section 12900, et seq.), and the applicable regulations promulgated thereunder in the California Code of Regulations. Contractor shall also abide by the Federal Civil Rights Act of 1964 (P.L. 88-352) and all amendments thereto, and all administrative rules and regulations issued pursuant to said act.

13. CANCELLATION.

This Agreement may be canceled by County without cause, and at will, for any reason by giving to Contractor ninety (90) days written notice of such intent to cancel. Contractor may cancel this Agreement without cause, and at will, for any reason whatsoever by giving ninety (90) days written notice of such intent to cancel to County.

14. ASSIGNMENT.

This is an agreement for the services of Contractor. County has relied upon the skills, knowledge, experience, and training of Contractor as an inducement to enter into this Agreement. Contractor shall not assign or subcontract this Agreement, or any part of it, without the express written consent of County. Further, Contractor shall not assign any monies due or to become due under this Agreement without the prior written consent of County.

15. DEFAULT.

If the Contractor abandons the work, or fails to proceed with the work and services requested by County in a timely manner, or fails in any way as required to conduct the work and services as required by County, County may declare the Contractor in default and terminate this Agreement upon five (5) days written notice to Contractor. Upon such termination by default, County will pay to Contractor all amounts owing to Contractor for services and work satisfactorily performed to the date of termination.

16. WAIVER OF DEFAULT.

Waiver of any default by either party to this Agreement shall not be deemed to be waiver of any subsequent default. Waiver or breach of any provision of this Agreement shall not be deemed to be a waiver of any other or subsequent breach, and shall not be construed to be a modification of the terms of this Agreement unless this Agreement is modified as provided in paragraph twenty-two (22) below.

17. CONFIDENTIALITY.

Contractor further agrees to comply with the various provisions of the federal, state, and county laws, regulations, and ordinances providing that information and records kept, maintained, or accessible by Contractor in the course of providing services and work under this Agreement, shall be privileged, restricted, or confidential. Contractor agrees to keep confidential all such information and records. Disclosure of such confidential, privileged, or protected information shall be made by Contractor only with the express written consent of the County. Any disclosure of confidential information by Contractor without the County's written consent is solely and exclusively the legal responsibility of Contractor in all respects.

Notwithstanding anything in the Agreement to the contrary, names of persons receiving public social services are confidential and are to be protected from unauthorized disclosure in accordance with Title 45, Code of Federal Regulations Section 205.50, the Health Insurance Portability and Accountability Act of 1996, and Sections 10850 and 14100.2 of the Welfare and Institutions Code, and regulations adopted pursuant thereto. For the purpose of this Agreement, all information, records, and data elements pertaining to beneficiaries shall be protected by the provider from unauthorized disclosure.

18. CONFLICTS.

Contractor agrees that it has no interest, and shall not acquire any interest, direct or indirect, which would conflict in any manner or degree with the performance of the work and services under this Agreement.

19. POST AGREEMENT COVENANT.

Contractor agrees not to use any confidential, protected, or privileged information which is gained from the County in the course of providing services and work under this Agreement, for any personal benefit, gain, or enhancement. Further, Contractor agrees for a period of two years after the termination of this Agreement, not to seek or accept any employment with any entity, association, corporation, or person who, during the term of this Agreement, has had an adverse or conflicting interest with the County, or who has been an adverse party in litigation with the County, and concerning such, Contractor by virtue of this Agreement has gained access to the County's confidential, privileged, protected, or proprietary information.

20. SEVERABILITY.

If any portion of this Agreement or application thereof to any person or circumstance shall be declared invalid by a court of competent jurisdiction, or if it is found in contravention of any federal, state, or county statute, ordinance, or regulation, the remaining provisions of this Agreement, or the application thereof, shall not be invalidated thereby, and shall remain in full force and effect to the extent that the provisions of this Agreement are severable.

21. FUNDING LIMITATION.

The ability of County to enter this Agreement is based upon available funding from various sources. In the event that such funding fails, is reduced, or is modified, from one or more sources, County has the option to cancel, reduce, or modify this Agreement, or any of its terms within ten (10) days of its notifying Contractor of the cancellation, reduction, or modification of available funding. Any reduction or modification of this Agreement made pursuant to this provision must comply with the requirements of paragraph twenty-two (22) (Amendment).

22. AMENDMENT.

This Agreement may be modified, amended, changed, added to, or subtracted from, by the mutual consent of the parties hereto, if such amendment or change is in written form and executed with the same formalities as this Agreement, and attached to the original Agreement to maintain continuity.

23. NOTICE.

Any notice, communication, amendments, additions, or deletions to this Agreement, including change of address of either party during the terms of this Agreement, which Contractor or County shall be required, or may desire, to make, shall be in writing and may be personally served, or sent by prepaid first class mail to, the respective parties as follows:

County of Inyo	
<u>Health and Human Services-BH</u>	Department
<u>162 J Grove Street</u>	Address
<u>Bishop, CA 93514</u>	City and State

Contractor:	
<u>North American Mental Health Services</u>	Name
<u>2165 Larkspur Lane</u>	Address
<u>Redding, CA 96002</u>	City and State

24. ENTIRE AGREEMENT.

This Agreement contains the entire agreement of the parties, and no representations, inducements, promises, or agreements otherwise between the parties not embodied herein or incorporated herein by reference, shall be of any force or effect. Further, no term or provision hereof may be changed, waived, discharged, or terminated, unless the same be in writing executed by the parties hereto.

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AGREEMENT BETWEEN COUNTY OF INYO
AND North American Mental Health Services
FOR THE PROVISION OF telepsychiatry **SERVICES**

IN WITNESS THEREOF, THE PARTIES HERETO HAVE SET THEIR HANDS AND SEALS
THIS _____ DAY OF _____, _____.

COUNTY OF INYO

By: _____
Signature

Print or Type Name

Dated: _____

CONTRACTOR

By: _____
Signature

Benton Kenney
Print or Type Name

Dated: 12-9-20

APPROVED AS TO FORM AND LEGALITY:

County Counsel

Grace Chubb

APPROVED AS TO ACCOUNTING FORM:

County Auditor

APPROVED AS TO PERSONNEL REQUIREMENTS:

Personnel Services

APPROVED AS TO INSURANCE REQUIREMENTS:

County Risk Manager

ATTACHMENT A

AGREEMENT BETWEEN COUNTY OF INYO
AND North American Mental Health Services
FOR THE PROVISION OF telepsychiatry **SERVICES**

TERM:

FROM: January 1, 2021 **TO:** June 30, 2021

SCOPE OF WORK:

A. Contractor will provide a maximum of 25 hours per week of telemedicine services with a licensed psychiatrist or psychiatrists or advanced practice nurse practitioner or physician assistant, referred to in this document as the "provider". The services will be provided in mutually agreed upon blocks of time scheduled in advance. During these blocks, patients can be scheduled to be seen as a traditional pre-scheduled appointment, a walk-in, or an urgent appointment. During the blocks of time agreed upon for services, in the case of a no-show, Contractor will allow for a substitution.

Telemedicine patients will be seen in a predetermined setting, primarily in an Inyo County outpatient clinic or in the jail, but also may be seen in other settings such as the home or in a community setting as long as privacy can be maintained.

B. Adult patient scheduling during the agreed upon hours of service will occur in thirty (30) minute sessions for returning and known patients and sixty (60) minute sessions for new adult patients and psychiatric evaluations. Child patient scheduling during the agreed upon hours of service will also occur in thirty (30) minute sessions for returning and known patients and sixty (60) minute sessions for new child patients and psychiatric evaluations. Providers will allowed thirty (30) minutes of administrative time for each four hours worked. Providers shall provide required documentation of services in the Inyo EHR system and will prescribe medications using the Inyo prescribing system.

E. Contractor and/or the provider will communicate with staff and schedulers regularly by telephone, or HIPAA compliant messaging. Contractor's tele-medicine platform will also meet all applicable standards for patient confidentiality.

F. Inyo may schedule Contractor for emergency on-call during hours and days mutually agreed upon by Inyo and Contractor.

G. In addition to telemedicine services, the Contractor may also provide tele-psychotherapy services and/or clinical supervision by a licensed practitioner of the healing arts (LPHA). The County may specifically request that the LPHA be a licensed psychologist, a licensed clinical social worker(LCSW), a licensed marriage and family therapist (LMFT), a licensed professional counselor, or a certified addiction counselor, referred to in this document as the "LPHA".

H. Providers and LPHA may be asked to participate in interdisciplinary meetings or other requested meetings for purposes of care coordination. These meetings may take place outside the scheduled blocks of time reserved for patient care but will be arranged in advance. Providers and LPHA will be paid their standard hourly rate as described in Attachment B.

I. LPHA may be asked to provide clinical supervision to Inyo behavioral health staff at mutually agreed upon times. LPHA will be paid their standard hourly rate.

J. In addition to Contractor's tele-medicine services, contractor may be asked to provide in-person services up to 1-2 times monthly, as mutually agreed upon by Inyo County and the Contractor. Providers and LPHA will be paid their standard hourly rate for travel time and time for in-person services.

ATTACHMENT B

AGREEMENT BETWEEN COUNTY OF INYO

AND Iris Telehealth Medical Group, PA

FOR THE PROVISION OF telepsychiatry **SERVICES**

TERM:

FROM: January 1, 2021

TO: June 30, 2021

SCHEDULE OF FEES:

Contractor will bill for provision of services at described in Attachment A at the following rates:

- Contract fees of two hundred sixty dollars (\$260.00) per hour for a psychiatrist;
- Contract fees of two hundred twenty dollars (\$220.00) per hour for a Nurse Practitioner (NP) or Physicians Assistant (PA) or a Psychologist;
- Contract fees of one hundred seventy-five (\$175.00) per hour for an LPHA.

1 additional hour will be billed for all license levels per 8 hours worked or 1/2 hr for every 4 hours worked.

If travel is requested by the County it will be billed at regular hourly rates during travel time.

ATTACHMENT C

**AGREEMENT BETWEEN COUNTY OF INYO
AND Iris Telehealth Medical Group, PA
FOR THE PROVISION OF telepsychiatry SERVICES**

TERM:

FROM: January 1, 2021

TO: June 30, 2021

SEE ATTACHED INSURANCE PROVISIONS

Insurance Requirements Attachment

Consultant shall procure and maintain for the duration of the contract insurance against claims for injuries to persons or damages to property which may arise from or in connection with the performance of the work hereunder by the Consultant, its agents, representatives, or employees. Failure to carry specified lines or limits of coverage does not relieve contractor of obligation to indemnify Inyo County.

MINIMUM SCOPE AND LIMIT OF INSURANCE

Coverage shall be at least as broad as:

Commercial General Liability (CGL): Insurance Services Office Form CG 00 01 covering CGL on an "occurrence" basis, including products and completed operations, property damage, bodily injury and personal & advertising injury with limits no less than \$2,000,000 per occurrence. If a general aggregate limit applies, either the general aggregate limit shall apply separately to this project/location (ISO CG 25 03 or 25 04) or the general aggregate limit shall be twice the required occurrence limit.

Automobile Liability: Insurance Services Office Form Number CA 0001 covering, Code 1 (any auto), or if Consultant has no owned autos, Code 8 (hired) and 9 (non-owned), with limit no less than \$1,000,000 per accident for bodily injury and property damage. (Limit reduced from \$5,000,000 when contract specifies contractor will not be transporting patients outside of their facility.) This provision applies only if/when Contractor provides in-person services.

Workers' Compensation: as required by the State of California, with Statutory Limits, and Employer's Liability Insurance with limit of no less than \$1,000,000 per accident for bodily injury or disease. Waived if consultant provides written verification it has no employees.

Professional Liability (Medical Malpractice): with limit no less than \$2,000,000 per occurrence or claim, \$2,000,000 aggregate.

Cyber Liability Insurance: as required due to access and management of electronic medical records, with limits not less than **\$2,000,000** per occurrence or claim, **\$2,000,000** aggregate. Coverage shall be sufficiently broad to respond to the duties and obligations related to electronic medical records, and shall include, but not be limited to, claims involving invasion of privacy violations, information theft, damage to or destruction of electronic information, release of private information, alteration of electronic information, extortion, and network security. The policy shall provide coverage for breach response costs as well as regulatory fines and penalties as well as credit monitoring expenses with limits sufficient to respond to these obligations.

If the Consultant maintains broader coverage and/or higher limits than the minimums shown above, Inyo County requires and shall be entitled to the broader coverage and/or the higher limits maintained by the contractor. Any available insurance proceeds in excess of the specified minimum limits of insurance and coverage shall be available to Inyo County.

(continued)

Insurance Requirements Attachment

OTHER INSURANCE PROVISIONS

The insurance policies are to contain, or be endorsed to contain, the following provisions:

Additional Insured Status

Inyo County, its officers, officials, employees, and volunteers are to be covered as additional insureds on the CGL policy with respect to liability arising out of work or operations performed by or on behalf of the Consultant including materials, parts, or equipment furnished in connection with such work or operations. General liability coverage can be provided in the form of an endorsement to the Consultant's insurance (at least as broad as ISO Form CG 20 10 11 85 or both CG 20 10, CG 20 26, CG 20 33, or CG 20 38; and CG 20 37 forms if later revisions used).

Primary Coverage

For any claims related to this contract, the Consultant's insurance coverage shall be primary insurance primary coverage at least as broad as ISO CG 20 01 04 13 as respects Inyo County, its officers, officials, employees, and volunteers. Any insurance or self-insurance maintained by Inyo County, its officers, officials, employees, or volunteers shall be excess of the Consultant's insurance and shall not contribute with it.

Notice of Cancellation

Each insurance policy required above shall state that coverage shall not be canceled, except with notice to Inyo County.

Waiver of Subrogation

Consultant hereby grants to Inyo County a waiver of any right to subrogation which any insurer of said Consultant may acquire against Inyo County by virtue of the payment of any loss under such insurance. Consultant agrees to obtain any endorsement that may be necessary to affect this waiver of subrogation, but this provision applies regardless of whether or not Inyo County has received a waiver of subrogation endorsement from the insurer.

Self-Insured Retentions

Self-insured retentions must be declared to and approved by Inyo County. Inyo County may require the Consultant to provide proof of ability to pay losses and related investigations, claim administration, and defense expenses within the retention. The policy language shall provide, or be endorsed to provide, that the self-insured retention may be satisfied by either the named insured or Inyo County.

Acceptability of Insurers

Insurance is to be placed with insurers authorized to conduct business in the state with a current A.M. Best's rating of no less than A:VII, unless otherwise acceptable to Inyo County.

Claims Made Policies

If any of the required policies provide coverage on a claims-made basis:

1. The Retroactive Date must be shown and must be before the date of the contract or the beginning of contract work.
2. Insurance must be maintained and evidence of insurance must be provided for at least five (5) years after completion of the contract of work.

Insurance Requirements Attachment

3. If coverage is canceled or non-renewed, and not replaced with another claims-made policy form with a Retroactive Date prior to the contract effective date, the Consultant must purchase "extended reporting" coverage for a minimum of five (5) years after completion of contract work.

Verification of Coverage

Consultant shall furnish Inyo County with original Certificates of Insurance including all required amendatory endorsements (or copies of the applicable policy language effecting coverage required by this clause) and a copy of the Declarations and Endorsement Page of the CGL policy listing all policy endorsements to Inyo County before work begins. However, failure to obtain the required documents prior to the work beginning shall not waive the Consultant's obligation to provide them. Inyo County reserves the right to require complete, certified copies of all required insurance policies, including endorsements required by these specifications, at any time. Failure to carry specified lines or limits of coverage does not relieve contractor of obligation to indemnify Inyo County.

Subcontractors

Consultant shall require and verify that all subcontractors maintain insurance meeting all the requirements stated herein, and Contractor shall ensure that Inyo County is an additional insured on insurance required from subcontractors.

Special Risks or Circumstances

Inyo County reserves the right to modify these requirements, including limits, based on the nature of the risk, prior experience, insurer, coverage, or other special circumstances.

-end-

Agency Information Sheet

County/City: INYO

Fiscal Year: 2020-2021

Official Agency

Name:	Inyo County Health & Human Services	Address:	PO Drawer H Independence, CA 93526
Health Officer	James Richardson, MD		

CMS Director (if applicable)

Name:	Anna Scott	Address:	207A West South Street
Phone:	760-873-7868		Bishop, CA 93514
Fax:	760-873-7800	E-Mail:	ascott@inyocounty.us

CCS Administrator

Name:	Marissa Whitney	Address:	207A West South Street
Phone:	760-873-7868		Bishop, CA 93514
Fax:	780-873-7800	E-Mail:	mhobbs@inyocounty.us

CHDP Director

Name:	James Richardson, MD	Address:	207A West South Street
Phone:	760-873-7868		Bishop, CA 93514
Fax:	760-873-7800	E-Mail:	healthofficer@inyocounty.us

CHDP Deputy Director

Name:	Marissa Whitney	Address:	207A West South Street
Phone:	760-873-7868		Bishop, CA 93514
Fax:	760-873-7800	E-Mail:	mhobbs@inyocounty.us

Clerk of the Board of Supervisors or City Council

Name:	Clint Quilter	Address:	PO Drawer N
Phone:	760-878-0292		Independence, CA 93526
Fax:	760-878-2241	E-Mail:	cquilter@inyocounty.us

Director of Social Services Agency

Name:	Marilyn Mann	Address:	163 May Street
Phone:	760-873-3305		Bishop, CA 93514
Fax:	760-878-0266	E-Mail:	mmann@inyocounty.us


Chief Probation Officer

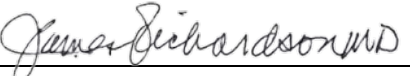
Name:	Jeff Thomson	Address:	P.O. Box T
Phone:	760-873-4121		Independence, CA 93526
Fax:	760-878-0436	E-Mail:	jthomson@inyocounty.us

Certification Statement - Child Health and Disability Prevention (CHDP) Program

County/City: INYO	Fiscal Year: 2020-21
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I certify that the CHDP Program will comply with all applicable provisions of Health and Safety Code, Division 106, Part 2, Chapter 3, Article 6 (commencing with Section 124025), Welfare and Institutions Code, Division 9, Part 3, Chapters 7 and 8 (commencing with Section 14000 and 14200), Welfare and Institutions Code Section 16970, and any applicable rules or regulations promulgated by DHCS pursuant to that Article, those Chapters, and that section. I further certify that this CHDP Program will comply with the Children's Medical Services Plan and Fiscal Guidelines Manual, including but not limited to, Section 9, Federal Financial Participation. I further certify that this CHDP Program will comply with all federal laws and regulations governing and regulating recipients of funds granted to states for medical assistance pursuant to Title XIX of the Social Security Act (42 U.S.C. Section 1396 et seq.). I further agree that this CHDP Program may be subject to all sanctions or other remedies applicable if this CHDP Program violates any of the above laws, regulations and policies with which it has certified it will comply.

	
Signature of CHDP Director	Date Signed

	
Signature of Director or Health Officer	Date Signed

Signature and Title of Other – Optional	Date Signed

I certify that this plan has been approved by the local governing body.	
Signature of Local Governing Body Chairperson	Date

Certification Statement - California Children's Services (CCS)

County/City: INYO	Fiscal Year: 2020-21
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I certify that the CCS Program will comply with all applicable provisions of Health and Safety Code, Division 106, Part 2, Chapter 3, Article 5, (commencing with Section 123800) and Chapters 7 and 8 of the Welfare and Institutions Code (commencing with Sections 14000-14200), and any applicable rules or regulations promulgated by DHCS pursuant to this article and these Chapters. I further certify that this CCS Program will comply with the Children's Medical Services (CMS) Plan and Fiscal Guidelines Manual, including but not limited to, Section 9 Federal Financial Participation. I further certify that this CCS Program will comply with all federal laws and regulations governing and regulating recipients of funds granted to states for medical assistance pursuant to Title XIX of the Social Security Act (42 U.S.C. Section 1396 et seq.) and recipients of funds allotted to states for the Maternal and Child Health Services Block Grant pursuant to Title V of the Social Security Act (42 U.S.C. Section 701 et seq.). I further agree that this CCS Program may be subject to all sanctions or other remedies applicable if this CCS Program violates any of the above laws, regulations and policies with which it has certified it will comply.

<i>Marissa Whitney</i>	
Signature of CCS Administrator	Date Signed

<i>Jana Richardson MD</i>	
Signature of Director or Health Officer	Date Signed

Signature and Title of Other – Optional	Date Signed

I certify that this plan has been approved by the local governing body.	
Signature of Local Governing Body Chairperson	Date

County of Inyo Children's Medical Services 2020-21

Program Narrative

Agency Description

The local California Children's Services (CCS), and Child Health and Disability Prevention (CHDP) are managed through the Inyo County Department of Health & Human Services (HHS), Public Health and Prevention Division. The administrative services of both programs share mutual management and clinical staff. The CCS and CHDP staff works primarily within two County offices located in the northern part of the county, in Bishop. Inyo County, while large in geographic size, is a rural county of approximately 18,000 people. Providing CMS services to a rural population such as Inyo's requires employees to often work in blended positions in which they have responsibility for more than one program and/or program function. The department makes every effort to cross-train staff to ensure a continuum of services when vacancies occur. However, multiple vacancies in multiple positions over the past several years have made cross-training and continuity difficult.

The Health Care Program for Children in Foster Care (HCPCFC) is managed and supervised jointly with Public Health being the lead and Behavioral Health and Child Welfare Services, divisions of Health and Human Services, having secondary oversight. The Foster Care Nurse is licensed as a PHN and works primarily in the Behavioral Health and Child Welfare office and coordinates medical and dental case management for children in foster care. A workstation is available at the CPS office for the Foster Care Nurse to work at weekly, or as often as needed.

The Inyo County Health Officer is the CHDP Director. The HHS Deputy Director-Public Health acts as the CMS Director. A Registered Nurse is assigned as the CCS Administrator and CHDP Deputy Director, who is responsible for resource and provider development in CHDP, and program coordination between CCS and HCPCFC; the focus being to assist the medical community in the delivery of program services through ongoing updates and trainings. The CCS/CHDP RN coordinates with multiple child service agencies to assure appropriate utilization of the CHDP Program and follow through is achieved for provider and school referrals. The CCS/CHDP RN works in coordination with the Prevention Specialists, Registered Dietitian, and the Foster Care Nurse.

The CCS/CHDP RN functions and takes a lead role in blending the overlapping objectives of CHDP, CCS, Medical Therapy Program (MTP), and Maternal Child and Adolescent Health (MCAH). This position works in coordination with a Program Technician for CCS, and serves as the Liaison for the MTP. This position has case management responsibility in both CCS and in CHDP programs. Referrals for CHDP follow up are appropriately assigned by the CHDP RN to the Foster Care Nurse, Prevention Specialists, and the Dietitian. The HHS Deputy Director-Public Health and the CCS/CHDP nurse meet minimally quarterly to address program oversight.

CCS case management is performed by the CCS/CHDP RN. The HHS Specialist in CCS functions half-time in CCS and provides general assistance to other Public Health program functions. All of the CCS case

management staff share a common office space, and case review is ongoing. The CCS staff meets monthly, locally and via State Conference calls to review specific items and program policies.

The Foster Care Nurse is embedded in the Behavioral Health and Child Welfare division and consults weekly with CPS Social Workers and Probation, and attends staffing meetings as needed in order to update the health and education passports for children in foster care as required by law. The Foster Care Nurse supports foster care providers in obtaining timely comprehensive health assessments and dental examinations, through expediting referrals for medical, dental, mental health and developmental services. The Foster Care Nurse works with the CCS/CHDP RN in order to identify major obstacles faced by children in foster care in gaining access to coordinated, multidisciplinary services. Infants and toddlers in foster care require referrals to Kern Regional Center for developmental assessment, and the CCS/Foster Care Nurse participates in developmental assessment via quarterly Early Start clinics. Some foster children require travel out of the county in order to obtain necessary specialty care authorized by CCS, or otherwise ordered by the treating physician. In these instances, referrals have been coordinated and authorized through the CCS/CHDP Nurse.

The Prevention Specialists, assigned to provide dental case management and obesity prevention activities, regularly contact local CHDP providers in order to obtain referrals for expedited case management for children in the CHDP Gateway program. Follow up of routine dental screening for children within the CHDP program is coordinated with the CCS/CHDP RN. Dental education with a focus on good oral health is provided to school age children in collaboration with the UCLA School of Dentistry volunteers and local schools through the "Miles of Smiles" program, in conjunction with MCAH program goals. During the school screenings, many referrals for dental case management are received with follow-up needed to enroll children into the CHDP Gateway program. The Prevention Specialist assigned to dental case management is involved in health/dental benefits eligibility review, dental appointment scheduling and providing transportation for parents and children in order to obtain dental care. This position is a full-time position, with time spread between Dental Case Management and providing nutritional education as a WIC Nutrition Assistant and nutrition educator under MCAH. The Prevention Specialist assigned to obesity prevention is a part-time position with time also spread to Substance Use Disorders Prevention as the mentor program coordinator. Within this role, the Prevention Specialist coordinates outdoor activities and other services to help low-income children and their families develop healthy habits.

Incumbent List - California Children's Services

For FY 2020-21 complete the table below for all personnel listed in the CCS budgets. Use **the same** job titles for both the budget and the incumbent list. Total percent for an individual incumbent should **not be over 100 percent**.

Specify whether job duty statements or civil service classification statements have been revised or changed. Only submit job duty statements and civil service classification statements that are new or have been revised. This includes (1) changes in job duties or activities, (2) changes in percentage of time spent for each activity, and (3) changes in percentage of time spent for enhanced and non-enhanced job duties or activities.

County/City: Inyo		Fiscal Year: 2020-21		
Job Title	Incumbent Name	FTE % on CCS Admin Budget	Have Job Duties Changed? (Yes or No)	Has Civil Service Classification Changed? (Yes or No)
Registered Nurse	Marissa Whitney	10	NO	NO
HHS Specialist	Nora Rudder	75	NO	NO
Office Tech III	Marjie Chapman	3	NO	NO
Administrative Analyst	Amber Williams	5	NO	NO

Incumbent List - Child Health and Disability Prevention Program

For FY 2020-21, complete the table below for all personnel listed in the CHDP budgets. Use the same job titles for both the budget and the incumbent list. Total percent for an individual incumbent should not be over 100 percent.

Specify whether job duty statements or civil service classification statements have been revised or changed in the last fiscal year. Only submit job duty statements and civil service classification statements that are new or have been revised. This includes (1) changes in job duties or activities, (2) changes in percentage of time spent for each activity, and (3) changes in percentage of time spent for enhanced and non-enhanced job duties or activities.

County/City:		Fiscal Year: 2020-21				
	Inyo					
Job Title	Incumbent Name	FTE % on CHDP No County/City Match Budget	FTE % on CHDP County/City Match Budget	FTE % in Other Programs (Specify)	Have Job Duties Changed? (Yes or No)	Has Civil Service Classification Changed? (Yes or No)
Deputy Director	Anna Scott	10%	N/A	90%	NO	NO
Admin Analyst	Amber Williams	5%	N/A	95%	NO	NO
Registered Nurse	Marissa Whitney	10%	N/A	90%	NO	NO
Prevention Specialist	Micaela Muro	5%	N/A	95%	NO	NO
Prevention Specialist	Timothy Villanueva	35%	N/A	65%	NO	NO

Incumbent List - Health Care Program for Children in Foster Care

For FY 2020-21, complete the table below for all personnel listed in the HCPCFC and CHDP Foster Care Administrative (County/City) budgets. Use the same job titles for both the budget and the incumbent list. Total percent for an individual incumbent should not be over 100 percent.

Specify whether job duty statements or civil service classification statements have been revised or changed in the last fiscal year. Only submit job duty statements and civil service classification statements that are new or have been revised. This includes (1) changes in job duties or activities, (2) changes in percentage of time spent for each activity, and (3) changes in percentage of time spent for enhanced and non-enhanced job duties or activities.

County/City:		Inyo		Fiscal Year: 2020-21		
Job Title	Incumbent Name	FTE % on HCPCFC Budget	FTE % on FC Admin County/City Match Budget	FTE % in Other Programs (Specify)	Have Job Duties Changed? (Yes or No)	Has Civil Service Classification Changed? (Yes or No)
Public Health Nurse	Laura Wieggers	20.00%	N/A	80.00%	NO	NO

CHDP Program Referral Data

Complete this form using the Instructions found on page 4-8 through 4-10.

County/City: INYO	FY 17-18		FY 18-19		FY 19-20	
Basic Informing and CHDP Referrals						
1. Total number of CalWORKs/Medi-Cal cases informed and determined eligible by Department of Social Services	Unavailable		Unavailable		Unavailable	
2. Total number of cases and recipients in "1" requesting CHDP services	Cases	Recipients	Cases	Recipients	Cases	Recipients
a. Number of CalWORKs cases/recipients	0	0	*	*	*	*
b. Number of Foster Care cases/recipients	0	0	*	*	*	*
c. Number of Medi-Cal only cases/recipients	0	0	*	*	*	*
3. Total number of EPSDT eligible recipients and unborn, referred by Department of Social Services' workers who requested the following:						
a. Medical and/or dental services	0		*		*	

b. Medical and/or dental services with scheduling and/or transportation	30	*	*
c. Information only (optional)	45	*	*
4. Number of persons who were contacted by telephone, home visit, face-to-face, office visit, or written response to outreach letter	52	*	*
Results of Assistance			
5. Number of recipients actually provided scheduling and/or transportation assistance by program staff	30	*	*
6. Number of recipients in "5" who actually received medical and/or dental services	30	*	*

* Beginning in We no longer receive the PM160 for referrals or data. We are working with the Managed Care plans for data information and following up on the referrals that we receive through other channels to do case management activities.

HCPCFC Memorandum of Understanding

Area of Responsibility for Child Health and Disability Prevention (CHDP) Public Health Nurses (PHNs) and Child Welfare Service (CWS) Agency Social workers and Probation Officers in the Health Care Program for Children in Foster Care (HCPCFC)

County/City: Inyo County

Effective Dates: 07/01/2020-06/30/2022

Service Provided	Local CHDP Responsibilities Foster Care PHN	Local Child Welfare Service Agency Responsibilities Social Worker/Probation Officer
Location	<ul style="list-style-type: none"> PHN will be located in the CWS agency with accessibility to all team members 	<ul style="list-style-type: none"> PHN will be located in the CWS agency with accessibility to all team members servicing children in foster care, including any PHNs currently working in CWS.
Supervision	<ul style="list-style-type: none"> PHN will be supervised by supervising PHN in the local CHDP program with input from CWS agency staff 	<ul style="list-style-type: none"> CWS agency/Supervising Probation Officer will provide input to the supervising PHN
Accessing Resources	<ul style="list-style-type: none"> PHN will identify health care providers in the community. PHN will evaluate the adequacy, accessibility and availability of the referral network for health care services and collaborate with CHDP staff to identify and recruit additional qualified providers. PHN will serve as a resource to facilitate (e.g., assist in scheduling appointments, arranging transportation, etc.) referrals to early intervention providers, specialty providers, dentists, mental health providers, CCS and other community programs. PHN will assist PHNs in the child's county of residence to identify and access resources to address the health care needs of children placed out of county. 	<ul style="list-style-type: none"> CWS agency Social Worker/Probation Officer will work with PHN to ensure that all children in foster care are referred for health services appropriate to age and health status on a timely basis. CWS agency Social Worker/Probation Officer will work with the foster care provider and the PHN to identify an appropriate health care provider for the child. CWS agency Social Worker/Probation Officer will work with the PHN to ensure that children placed out of county have access to health services appropriate to age and health status.

Service Provided	Local CHDP Responsibilities Foster Care PHN	Local Child Welfare Service Agency Responsibilities Social Worker/Probation Officer
Health Care Planning and Coordination	<ul style="list-style-type: none"> • PHN will interpret health care reports for social worker/probation officers and others as needed. • PHN will develop a health plan for each child expected to remain in foster care. • PHN will work with foster care provider to ensure that the child’s Health and Education Passport or its equivalent is updated. • PHN will assist foster care providers in obtaining timely comprehensive assessments. • PHN will expedite timely referrals for medical, dental, developmental, and mental health services. • PHN will assist social worker/probation officer in obtaining additional services necessary to educate and/or support the foster caregiver in providing for the special health care needs, including but not limited to Early and Periodic Screening, Diagnosis, and Treatment Supplemental Services (EPSDT-SS). • PHN will obtain and provide health care documentation when necessary to support the request for health care services. • PHN will collaborate with social worker/probation officer, biological parent when possible and foster care provider to ensure that necessary medical/health care information is available to those persons responsible for providing healthcare for the child, including a copy of the Health Education Passport (HEP) to the foster care provider. • PHN will assist social worker/probation officer to assess the suitability of the foster care placement in light of the health care needs of the child. • PHN will collaborate with the social worker/probation officer and foster care provider to develop a system of 	<ul style="list-style-type: none"> • Child’s Social Worker/Probation Officer will collaborate with PHN to develop a health plan which identifies the health care needs and service priorities for each child expected to remain in foster care for 6 months or longer. • Social Worker/Probation Officer or designee will incorporate health plan into child’s case record. • Social Worker/Probation Officer will assemble and provide health care documentation to the court when necessary to support the request for health care services. • Social Worker/Probation Officer will collaborate to complete and keep current the child’s Health and Education Passport or its equivalent and provide a copy of the HEP to the foster care provider. • Social Worker/Probation Officer will consult with the PHN to assess the suitability of the foster care placement in light of the health care needs of the child. • Social Worker/Probation Officer will collaborate with the PHN and foster care provider to develop a system of tracking and follow-up on changes in the health care status of the child, service needs, effectiveness of services provided, etc. • Social Worker/Probation Officer will review child’s health plan with PHN at least every six months and before every court hearing relevant information will be incorporated into the HEP and court report.

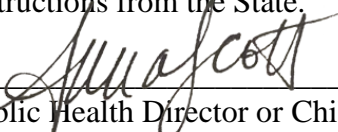
Service Provided	Local CHDP Responsibilities Foster Care PHN	Local Child Welfare Service Agency Responsibilities Social Worker/Probation Officer
	<p>tracking and follow-up on changes in the health care status of the child, service needs, effectiveness of services provided, etc.</p> <ul style="list-style-type: none"> PHN will review child’s health plan with social worker/probation officer as needed and at least every six months. 	<ul style="list-style-type: none"> CWS agency/Supervising Probation Officer will provide input to the supervising PHN
Training/Orientation	<ul style="list-style-type: none"> PHN will participate in developing and providing educational programs for health care providers to increase community awareness of and interest in the special health care needs of children in foster care. PHN will educate social workers, juvenile court staff, foster care providers, school nurses and others about the health care needs of children in foster care. 	<ul style="list-style-type: none"> CWS agency staff/Probation Officers will provide input to PHN in developing curriculum for training others about health care needs of children in foster care. CWS agency staff/Probation Officers will collaborate with PHNs in educating juvenile court staff, foster care providers, and others about the health care needs of children in foster care. CWS agency personnel will arrange for PHN access to the Child Welfare Services/Case Management System (CWS/CMS) system and provide training in its use.
Policy/Procedure Development	<ul style="list-style-type: none"> PHN will provide program consultation to CDSS/Probation Departments in the development and implementation of the EPSDT/CHDP program policies related to the Health Care Program for Children in Foster Care. PHN will participate in multi-disciplinary meetings for review of health-related issues. 	<ul style="list-style-type: none"> CWS agency staff/Probation Officers will include the PHN in team meetings and provide orientation to social services and consultation on CWS/CMS.
Transition from Foster Care	<ul style="list-style-type: none"> PHN will provide assistance to the Social Worker/Probation Officer and the child leaving foster care on the availability of options of health care coverage and community resources to meet the health care needs upon emancipation. 	<ul style="list-style-type: none"> CWS agency staff/Probation Officers will collaborate with PHN to assure person leaving foster care supervision is aware and connected to resources for independent living.

County/City: Inyo County

Effective Dates: 07/01/2020-06/30/2022

Service Provided	Local CHDP Responsibilities Foster Care PHN	Local Child Welfare Service Agency Responsibilities Social Worker/Probation Officer
Quality Assurance	<ul style="list-style-type: none"> • PHN will conduct joint reviews of case records for documentation of health care services with CWS agency/Probation Department. • PHN will work with CWS agency/Probation Department to develop a plan for evaluating the process and impact of the addition of the PHN component to the foster care team. • PHN will establish baseline data for evaluating health care services provided to children in foster care. 	<ul style="list-style-type: none"> • CWS agency staff/Probation Officers will conduct joint reviews of case records for documentation of health care services. • CWS agency/Probation Department will work with PHN to develop a plan for evaluating the process and impact of the addition of the PHN component to the foster care team. • CWS agency/Probation Officers will collaborate and assist PHN in gathering data.


This Memorandum of Understanding in effect from July 1, 2020 through June 30, 2022, unless revised by mutual agreement. In the event that changes in federal or state requirements impact the current Memorandum of Understanding, the local health department, social services department, and probation department agree to renegotiate the pertinent section within 90 days of receiving new instructions from the State.



 Public Health Director or Child Health and Disability
 Prevention Program Director


12/18/2020

 Date



 County Social Services Director or County Child Welfare
 Service Agency Director

 Date



 Chief Probation Officer

 Date

COUNTY OF INYO

INTERAGENCY AGREEMENT

Fiscal Year 2020-2022

I. STATEMENT OF AGREEMENT

This statement is entered into intradepartmentally between the Health Services Division and Social Services Division of the Inyo County Department of Health and Human Services and the Inyo County Probation Department to assure compliance with federal and state regulations and the appropriate expenditure of Early and Periodic Screening, Diagnosis and Treatment (EPSDT) funds in the implementation of the Child Health and Disability Prevention (CHDP) Program.

II. STATEMENT OF NEED

The following specific needs in Inyo County have been identified by the Health and Social Services departments as a focus for FY 2020-2022.

- A. Need for increasing the number of referrals for CHDP services using a variety of modalities including continuing staff education for the purposes of increasing referrals and identifying children's health conditions for which to seek consultation and coordination by trained health professionals.
- B. Need for increasing target population to be screened during 2020-2022.
- C. Need for increasing coordinated, comprehensive and culturally competent services for children living in foster care (relative/kinship, foster family homes, group homes, etc.) including CHDP health assessment services and needed diagnostic and treatment services.
- D. Gaps in existing program.
- E. Objectives for the year of the agreement that represent joint activities of the health and social services departments.
- F. Need for consultation and information about CHDP resources and general public health services in child care settings.
- G. Need for involvement of other community organizations in the program, e.g., advocate groups.
- H. Need for evaluation of reporting systems in health and social services departments.
- I. Need for coordination with local Medi-Cal managed care plans, where appropriate.

III. ORGANIZATIONAL AND FUNCTIONAL RELATIONSHIPS

- A. The exchange of information about persons applying for or receiving Medi-Cal, with or without linkages to other social services programs as outlined in this document, is permitted by state and federal law and regulations, and is to be maintained in a confidential manner.
- B. See attached organization charts and flow charts.

IV. SOCIAL SERVICES DEPARTMENT RESPONSIBILITIES AND ACTIVITIES

A. Basic informing and documentation of informing of CalWORKS and Medi-Cal.

Following are the requirements for Basic Informing and Documentation of Informing by Eligibility Determination staff of persons applying for, or receiving CalWORKS or Medi-Cal.

1. In- person Application/Annual Re-determination.
 - a. In the requested face-to-face eligibility intake interview or at the time of the annual re-determination, the appropriate responsible adult(s) for Medi-Cal eligible persons, including unborn, and persons under 21 years of age will be:
 - (1) Given a state approved brochure about the CHDP program.
 - (2) Given an oral explanation about CHDP including:
 - (a) The value of preventive health services and the differences between episodic and wellness care; and
 - (b) Availability of health assessments; and
 - (c) Availability of dental Services; and
 - (d) The need for prompt diagnosis and treatment of suspected conditions to prevent disabilities and that all medically necessary diagnosis and treatment services will be paid for by Medi-Cal; and
 - (e) The nature, scope, and benefits of the CHDP program.
 - (3) Asked questions to determine whether:
 - (a) More information about CHDP program services is wanted; and
 - (b) CHDP program services-medical and/or Dental-are wanted; and
 - (c) Appointment scheduling and/or transportation assistance are needed to obtain requested CHDP medical and/or dental services.
 - b. The Eligibility Determination staff will document on the SAWS2 using the automated ISAWS system that face-to-face informing occurred.
 - (1) Explanation and brochure given;
 - (2) Date of the explanation and giving of the brochure; and
 - (3) Client's responses to the CDHP services questions.

B. Mail-in Application/Annual Re-determination – Medi-Cal

1. Responsible adult(s) for Medi-Cal eligible persons under 21 years of age who apply by mail will do so through a state approved Medi-Cal Application/Annual Re-determination form. The Application/Annual Re-determination process includes:

- a. a state approved brochure about the CHDP program; and
 - b. questions to determine whether:
 - (1) more information about CHDP program services is needed.
 - (2) CHDP program services-medical and/or dental-are wanted; and
 - (3) Appointment scheduling and/or transportation assistance are needed to obtain requested CHDP medical and/or dental services.
2. Eligibility Determination staff will document on the designated form if any follow-up action is required.
- Note: Any “YES” response to the CDHP questions or offer of services through face-to-face encounters or mail-in requires a referral on the CHDP Referral Form (PM 357), or state approved alternate form. See CHDP Program Letter No. 81-5 and All County Letter No. 81-43.
- C. Basic Informing and Documentation of Informing for Children in Foster care Program Placement.
- Following are the requirements for Basic Informing and Documentation of informing by staff responsible for placement of children in foster care, including placements controlled by the Probation Department, Licensed Adoption Agency, and / or Placement Agencies.
- 1. Within 30 days of placement, the staff responsible for placing the child (i.e., social worker, probation officer) will document the need for any known health, medical, or dental care and ensure that information is given to the payee, hereafter referred to as the out-of-home care provider, about the needs of the eligible person and the availability of CHDP services through the CHDP program. In the case of an out-of-state placement, the social worker shall ensure information is given to the out-of-home care provider about the federal EPSDT services. The care provider and/or child will be:
 - a. Given a State approved brochure about CHDP services and information about the recipient’s need of preventive health care, and
 - b. Given a face-to-face oral explanation about CHDP including:
 - (1) The value of preventive health services and the difference between episodic and wellness care:
 - (2) The availability of health assessments according to the CHDP periodicity schedule, and how to obtain health assessments at more frequent intervals if no health assessment history is documented or the child has entered a new foster care placement.
 - (3) The availability of annual dental exams for children 3 years of age and older.

- (4) The need for prompt diagnosis and treatment of suspected conditions to prevent disabilities and that all medically necessary diagnosis and treatment services will be paid for by Medi-Cal; and
- (5) The nature and scope and benefits of the CHDP program.
- c. Ask questions to determine whether:
 - (1) More information about the CHDP program is wanted;
 - (2) CHDP program services-medical and/or dental-are warranted; and
 - (3) Appointment scheduling and/or transportation assistance is needed to obtain CHDP medical and/or dental services.
- 2. The Child Welfare Services Staff responsible for placement will document the care provider's response to the questions in the CHDP program of the Identification Page in the Placement Notebook in the Placement Management Section in the Client Services Application on the Child Welfare Services/Case Management System (CWS/CMS):
 - a. Date care provider was informed of the CHDP program and brochure given; and
 - b. Care provider's request for CHDP services/
- 3. The Probation Department, Licensed Adoption Agency, or other Placement Agency staff responsible for placement will document the care provider and/or child's response to the CHDP questions on the CHDP Referral Form (PM 357) and maintain a copy in the case record.
 Note: Any "Yes" response to the CHDP questions or offer of services requires a referral on the CHDP Referral Form (PM 357). See CDHP Program Letter No. 81-5 and All County Letter no. 81-43. A copy of the Referral Form is to be maintained in the child's case record.
- 4. A "payee" referred to as the "out-of-home care provider" or care provider, is defined as the foster parent(s) in a foster home, the officially designated representative of the payee when the child in a foster care program, or a Medi-Cal eligible child residing in a group home, residential treatment center, or an other out-of-home care facility.
- 5. Child Welfare services staff responsible for the child in a foster care replacement will complete annual informing of the care provider/child. They will include information about CHDP preventive health services, unmet health care needs requiring follow-up, and a review of the child's access to a primary care provider according to the process outlined for initial informing in B.1, a-c; and will document the results of informing in the case plan update.

6. The Probation Department, Licensed Adoption Agency, or other Placement Agency staff responsible for placement will complete annual informing and the documentation of that informing including Section IV, C (1) b.1 and 3.
7. Annual informing of payee/recipient about CHDP services and follow-up on health status shall be provided in the same manner as initial informing at the time of the six-month redetermination of the CalWORKS-FC recipient's circumstances.
8. At the time of placement of the CalWORKS-FC child, Probation Department will inform eligible population in the same manner as Social Services. Juvenile probation officers will receive annual in-service related to CHDP program. Each placement "payee" is oriented by CHDP program staff to the child's eligibility.
9. The placement worker assumes the responsibility of case management which includes providing CHDP information to the relative who is accepting child placement or the child's parents upon return to the home.
10. The placement worker assuming case management responsibilities will be in direct contact with the out-of-county payees accepting Inyo children. At the time of placement, the payee will be notified of CHDP services.

D. Documentation of Informing by Placement Worker

The following will be documented on the PM 357 or a State approved alternate form and maintained in the case record: (If using an alternate form, indicate name and number and date of approval. See CHDP Program Letter No. 81-5 and All County Letter No. 81-43.)

1. Explanation and brochure given
2. Date of explanation and given of brochure,
3. Client's responses to offer of:
 - a. Additional CHDP program information,
 - b. Medical and/or dental services, and
 - c. Transportation and/or appointment scheduling assistance when CHDP medical/dental services are requested.

E. Referral to the EPSDT Unit of the CHDP program

1. All "yes" responses to the offers of more information about CHDP, CHDP medical/dental services, and appointment scheduling/transportation assistance from applicants, recipients, or payees shall be formerly referred on a "CHDP Referral Form" (PM 357), or State approved alternated form, to the Health Department, EPSDT or CHDP. This action is required to ensure that these services are received and that any necessary diagnostic and/or treatment services are initiated within 120 days of the date of eligibility determination for CalWorks-FG/U and Medi-Cal clients,

and within 120 days of the date of request for Cal Works-FC clients.

2. Upon receipt of the PM 357, the EPSDT Unit staff forwards written information explaining the CHDP services to the payee of the child placed out-of-county.
3. Referrals received from the Probation Department and/or licensed adoption agency will be managed in a similar manner as described in Number 2 above.

F. Information Provided by Social Services Staff on PM 357 or State Approved Alternate Referral Form.

The following will be documented when any “yes” response is given, written or verbal, to the offer of services.

1. Case Name and Medi-Cal Identification Number.
2. Type of services requested:
 - a. Additional information
 - b. Medical services
 - c. Dental Service
 - d. Transportation assistance
 - e. Appointment scheduling assistance
3. Source of referral; new application, redetermination or self-referral.
4. Case type – CalWORKS, Foster Care, Medi-Cal Only (Full Scope, Limited Scope with or without a Share of Cost).
5. Complete listing of members in case with birthdates including unborns with expected date of confinement (EDC).
6. Listing of the payee/out-of-homes care provider and child in foster care.
7. Residence address and telephone numbers.
8. Worker signature.
9. Date of eligibility determination for Cal WORKS and Medi-Cal only cases or date of request for children in foster care and self-referrals.

G. Case Management for Children in foster Care

1. The staff responsible for placement of the child will ensure that the child receives medical and dental care which places attention on preventive health services through the CHDP program, or equivalent health services in accordance with the CHDP program’s schedule for periodic health and dental assessments. More frequent health assessments may be obtained for a child when the child enters a new placement. For example, if there is no record documenting a health assessment during their previous placement, if they are performing age expected developmental skills, or they have been moved to an area with a new provider, another health assessment may be claimed through CHDP by entering “New Foster Care Placement” in the

Comments/Problems area of the Confidential Screening/Billing Report (PM 160).

2. The staff responsible for placement of the child will ensure that arrangements are made for necessary diagnosis and treatment of health conditions suspected or identified.
3. Medical records including, but not limited to, copies of the CHDP Confidential Screening/Billing Reports (PM 160) or results of equivalent preventive health services and for any child in foster care and for children in foster care over the age of three years, result(s) of dental visit(s) must also be maintained in the case record to verify health status of the child.
4. The case plan shall contain a plan which will ensure that the child receive medical and dental care which places attention on preventive health services in accordance with the CHDP program's schedule for periodic health and dental assessments.

V. EPSDT UNIT OF THE CHDP PROGRAM RESPONSIBILITIES AND ACTIVITIES FOR REFERRALS.

- A. Inyo County Health Department offices are located in Bishop, Lone Pine and Independence. Administration of the Program occurs in the Independence office.
Inyo County Social Services Department offices are located in Bishop, Lone Pine and Independence. Administration originates from the Independence site.
- B. Duty statements of unit personnel are attached.
- C. Overall medical supervision to be provided by CHDP Director/Inyo County Health Officer. Director is available to provide medical consultation to CHDP providers if problems occur.
Administrative supervision to be provided by CHDP Deputy Director. Deputy Director performs periodic onsite in-services to CHDP providers and is available for telephone consultations when problems occur. Through period review of the PM 160's, the quality and completeness of program guideline compliance is monitored.
Day to Day supervision to be provided by the Inyo County Clinical Services Director (CSD). In this dual role of CSD and Deputy Director, supervision is available to medical and support staff on a routine onsite basis and the Inyo County Health Department.
- D. The unit will accept and take appropriate action on all referrals of Medi-Cal eligible persons under 21 years of age, including unborn, and will:
 1. Intensively inform those requesting more information, and offer scheduling and transportation assistance to those who request CHDP medical and/ or dental services.

2. Provide all requested scheduling and/or transportation assistance so that medical and/or dental services can be received from a provider of the requester's choice. These services will be provided and diagnosis and treatment initiated within 120 days of the date of eligibility is being redetermined, and within 120 days of request date for self referrals and AFDC-FC recipients unless:
 - a. Eligibility is lost; or
 - b. Recipient is lost to contact and a good faith effort was made to locate the person as defined in Section VII; or
 - c. Failure to receive services was due to an action or decision of the family or person.
 3. Assure that persons asking for health assessment procedures not furnished by their provider are referred to another provider for those procedures so that all requested CHDP services are received within 120 days of the initial request.
 4. Follow-up on persons requesting appointment scheduling and Transportation assistance to:
 - a. Re-offer scheduling and transportation assistance to those persons whose failure to keep appointments was not due to an action or decision of the family or person.
 - b. Offer and provide requested assistance to those for whom further diagnosis and treatment is indicated.
- E. Notices of the need for a health assessment, with the offer of scheduling and transportation assistance, will be sent monthly to children with labels received from the state.
- Labels with current addresses will be generated by the State CHDP program on all children twenty-seven months of age or younger who:
1. Have a PM 160 on file, but have not had another PM 160 submitted for services given in the past five months, and
Are still Medi-Cal eligible.
- F. The following will be documented on the PM 357 or an alternate State approved form for each eligible person listed:
1. Type of transportation assistance and date given.
 2. Appointment scheduling assistance and date given.
 3. Date(s) of appointment(s) and name(s) of provider(s).
 4. Confirmation of CHDP services:
 - a. Health assessment requires a PM 160 on file or provider certification of provision of service.
 - b. Dental services require family, provider or recipient verification.
 5. Follow-up to needed diagnosis and treatment.
 - a. Response to offer of appointment scheduling and transportation assistance.
 - b. Type of transportation assistance and date given.

- c. Date(s) of appointments(s) and name(s) of provider(s).
 - d. Confirmation of care – PM 161 or similar form of verification by provider.
 - 6. Date appointment scheduling and/or transportation assistance was declined and by whom.
 - 7. Disposition of case: appointment kept or not kept, eligibility lost, family declined further services, or family/person lost to contact and Good Faith Effort was made to locate the person as defined in Section V11.
 - G. Dates periodic notice of appointments sent and any response received will be documented in the Health Department.
 - H. A quarterly report will be submitted by the 15th day following the end of each quarter to the State Department of Health Services showing the number of Cal WORKS and Medi-Cal only persons requesting CHDP services.
- VI. CHDP PROGRAM RESPONSIBILITIES AND ACTIVITIES**
- A. An adequate number of medical providers will be available to meet county needs and federal regulations in regard to allowable time frames.
 - B. The county will make all possible attempts to assure an adequate number of dental providers to meet county needs and federal regulations.
 - C. An adequate supply of the following materials will be available to meet Social Services Department and other county needs.
 - 1. State approved informing brochure with the address and phone number of the local CHDP Program.
 - 2. Current list of CHDP medical and dental providers.
 - 3. Other informational material, e.g., CHDP posters.
 - D. When eligible persons still needing CHDP services move to another county, the new county will be notified and appropriate information sent. If known that eligible person has relocated, the PM 357 will be forwarded to the appropriate county.
 - E. Copies of Screening/Billing Reports (PM 160s) for services given to children in foster care will be sent to the responsible Social Services staff person marked “Confidential”.
 - F. All recipients eligible for Title V services will be informed of availability of these services and referred as requested.
 - G. Referrals for public health nursing services for intensive informing and follow-up to health assessment and diagnosis and treatment will be accepted, and such services will be provided.
- VII. JOINT SOCIAL SERVICES/ CHDP RESPONSIBILITIES**
- A Good Faith Effort will be made to locate all persons lost to contact. The EPSDT Unit/CHDP program will query the Social Services Department for current addresses, telephone numbers, and Medi-Cal status of these persons. Upon request, the Social Services Department will share this information. The exchange of this confidential information is based on federal and state regulations.
- VIII. STAFF EDUCATION**

CHDP administrative program staff has the responsibility for conducting the training for each item below:

- A. Within ninety (90) days of employment by the Social Services Department, all new staff with responsibility for placement or eligibility determination will have completed orientation regarding the CHDP program and their roles and responsibilities for informing clients about CHDP and referring for services by the CHDP Deputy Director and Program Manager.
- B. Within ninety (90) days of employment by the Probation Department or licensed adoption agency, staff responsible for placement will have completed orientation regarding the CHDP program and their roles and responsibilities for informing clients about CHDP and referring for services by the CHDP Deputy Director.
- C. Upon licensure and at renewal, foster parent(s) and group care home, residential treatment center, and other out-of-home care facility staff will have completed orientation regarding nature, scope, benefits and availability of CHDP program services by the CHDP Deputy Director.
- D. All appropriate health department staff will receive orientation and an annual update regarding the CHDP program.
- E. All placement and eligibility determination staff will receive an annual update regarding the CHDP program.
- F. Staff in-service educational needs will be identified by:
 - 1. Significant changes in the regulations which would affect the Program Management.
 - 2. Increase in questions from Program Staff or repeated incomplete responses on appropriate documents (PM357s).

IX. MANAGEMENT INFORMATION AND PROGRAM EVALUATION

- A. The following information will be compiled and shared between departments at the annual training.
 - 1. Eligible-Intake/Redetermination. Break out number of children in foster care placement.
 - 2. Requests for CHDP services.
 - 3. Requests for more information.
 - 4. Requests for scheduling and/or transportation assistance.
 - 5. Medical assessment services requested and received.
 - 6. Referrals to diagnosis and treatment.
 - 7. Examples of children helped.
- B. Program Evaluation
Program Evaluation of the following will be made by the CHDP Deputy Director and Program Manager on, at least a quarterly basis:
 - 1. Social Services Department and EPSDT Units in Health Department.
 - 2. Program procedures, e.g., periodic notification, request for assistance, follow-up, and completion of PM 160s.
 - 3. Case management of CHDP process/system within each department. Consult with Health Officer.

4. Interagency Agreement objectives.

X. COMPLIANCE CERTIFICATION

In signing this agreement, we hereby certify that the CHDP program in our community will meet the compliance requirements and standards pertaining to our respective departments contained in the following:

- A. Enabling legislation of the CHDP program.
Reference: Health and Safety Code Sections 124025 through 124110 and Section 24165.3.
- B. CHDP program regulations that implement, interpret, or make specific the enabling legislation.
Reference: California Code of Regulations, Title 17, Section 6800 through 6874.
- C. Medi-Cal regulations pertaining to the availability and reimbursement of EPSDT services through the CHDP program.
Reference: California Code of Regulations, Title 22, Sections 51304(c), 51340, and 51532.
- D. Regulations defining county Social Services Department responsibilities for meeting CHDP/EPSDT program requirements.
 - 1. Social Services Regulations
Reference:
 - a. Staff Development and Training Standards-Manual of Polices and Procedures (MPP) Sections: 14-530, 14-610.
 - b. Civil Rights-MPP Section 21-101, 21-107, 21.115.
 - c. Eligibility and Assistance Standards-MPP Sections: 40-107.61, 40-131.3(k), 40-181.211, 45-201.5.
 - d. Child Welfare Services Program Standards-MPP Sections: 31-002(c)(8), 31-075.3(h)(1), 31-075.3(h)(2), 31-205.18, 31-206.35, 31-206.351, 31-206.352, 31-206.36, 31-206.361, 31-206.362, 31-206.42, 31-206.421, 31-206.422, 31-330.111, 31-401.4, 31.401.41, 31-401.412, 31-401.413, 31-405.1(f), 31-405.1(g), 31-405.1(g)(1).
 - e. Intra and interagency relations and agreements Chapter 29-405 and Chapter 29-410.
 - 2. Medical Regulations
Reference:
 - a. California Code of Regulations, Title 22, Sections: 50031; 50157(a), (d),(e),(f), and 50184(b).
 - b. Other Title 22 regulations governing DSS programs regarding adoptions and referring parents to community services, including CHDP Pre-placement Advisement, California Code of Regulations, Title 22, Section 35094.2 and Advisement of Parents Whose Child has not been removed from Parent's Care, Section 35129.1.
- E. Current interpretive releases by State Health Services and Social Services Departments.

1. Children's Medical Services (CMS Branch)/CHDP program Letters and Informational Notices-Health Services.
2. All County Letters-Social Services
3. Joint Letters-Health Services and Social Services
4. CMS Branch/CCS Numbered Letters pertaining to the CHDP program-Health Services.

This interagency agreement is in effect from July 1, 2020, through June 30, 2022, unless revised by mutual agreement.

NOTE: In the event that changes in federal or state legislation impact the current Interagency Agreement, all parties agree to renegotiate the pertinent section within 90 days of receiving new language or instructions from the State.

HHS Deputy Director- Public Health & Prevention

Date

K. Oney

HHS Deputy Director- Social Services & Aging Programs

12/11/2020

Date

[Signature]

Chief Probation Officer

December 11, 2020

Date

**CHDP Administrative Budget Summary
No County/City Match
Fiscal Year 2020/21**

County/City Name: Inyo

Column	1	2	3	4	5
Category/Line Item	Total Budget (2 + 3)	Total CHDP Budget	Total Medi-Cal Budget (4 + 5)	Enhanced State/Federal (25/75)	Nonenhanced State/Federal (50/50)
I. Total Personnel Expenses	\$57,765	\$0	\$57,764	\$8,691	\$49,072
II. Total Operating Expenses	\$28,026	\$0	\$28,026	\$0	\$28,026
III. Total Capital Expenses					
IV. Total Indirect Expenses	\$798	\$0	\$798		\$798
V. Total Other Expenses					
Budget Grand Total	\$86,589	\$0	\$86,588	\$8,691	\$77,896

Column	1	2	3	4	5
Source of Funds	Total Funds	Total CHDP Budget	Total Medi-Cal Budget	Enhanced State/Federal	Nonenhanced State/Federal
State General Funds	\$0				
Medi-Cal Funds:	\$86,588		\$86,588		
State Funds	\$31,021		\$31,021	\$21,715	\$9,306
Federal Funds (Title XIX)	\$55,939		\$55,939	\$39,157	\$16,782

Melissa Best-Baker	<i>Melissa Best-Baker</i>	12/4/2020	760-878-0232	mbestbaker@inyocounty.us
Prepared By (Signature)		Date Prepared	Phone Number	Email Address
Anna Scott	<i>Anna Scott</i>	12/4/20	760-873-7868	ascott@inyocounty.us
CHDP Director or Deputy Director (Signature)		Date	Phone Number	Email Address

CHDP Administrative Budget Worksheet
No County/City Match
State and State/Federal
Fiscal Year 2020/21

Column	1A	1B	1	2A	2	3A	3	4A	4	5A	5
Category/Line Item	% or FTE	Annual Salary	Total Budget (1A x 1B or 2 + 3)	CHDP % or FTE	Total CHDP Budget	Total Medi-Cal %	Total Medi-Cal Budget (4 + 5)	% or FTE	Enhanced State/Federal (25/75)	% or FTE	Nonenhanced State/Federal (50/50)
Personnel Expenses											
1. Scott, Deputy Director	10%	\$109,090	\$10,909	0%	\$0	100%	\$10,909	0%	\$0	100%	\$10,909
3. Whitney, RN	10%	\$83,906	\$8,391	0%	\$0	100%	\$8,391	75%	\$6,293	25%	\$2,098
4. Villanueva, Prevention Spcst	45%	\$36,964	\$16,634	0%	\$0	100%	\$16,634	0%	\$0	100%	\$16,634
5. Muro, Prev Spct	5%	\$51,643	\$2,582	0%	\$0	100%	\$2,582	0%	\$0	100%	\$2,582
6. Williams, Administrative Analyst	5%	\$66,225	\$3,311	0%	\$0	100%	\$3,311	0%	\$0	100%	\$3,311
7.											
8.											
9.											
Total Salaries and Wages			\$41,827		\$0		\$41,827		\$6,293		\$35,534
Less Salary Savings											
Net Salaries and Wages			\$41,827		\$0		\$41,827		\$6,293		\$35,534
Staff Benefits (Specify %) 38.10%			\$15,936				\$15,935		\$2,398		\$13,538
I. Total Personnel Expenses			\$57,765		\$0		\$57,764		\$8,691		\$49,072
II. Operating Expenses											
1. Travel			\$0				\$0		\$0		\$0
2. Training			\$0				\$0		\$0		\$0
3. General Office Supplies / Services			\$24,986		\$0		\$24,986				\$24,986
4. Motor Pool			\$250				\$250				\$250
5. Utilities			\$1,200				\$1,200				\$1,200
6. Internal Charges			\$1,590				\$1,590				\$1,590
II. Total Operating Expenses			\$28,026		\$0		\$28,026		\$0		\$28,026
III. Capital Expenses											
1.											
2.											
3.											
4.											
5.											
III. Total Capital Expenses											
IV. Indirect Expenses											
1. Internal (Specify %) 1.380%			\$798				\$798				\$798
2. External (Specify %) 0.00%											
IV. Total Indirect Expenses			\$798				\$798				\$798
V. Other Expenses											
1.											
2.											
3.											
4.											
5.											
V. Total Other Expenses											
Budget Grand Total			\$86,589		\$0		\$86,588		\$8,691		\$77,896

Melissa Best-Baker *Melissa Best-Baker* 12/4/2020 760-878-0232 mbestbaker@inycounty.us
 Prepared By (Signature) Date Prepared Phone Number Email Address
 Anna Scott *Anna Scott* 760-873-7868 ascott@inycounty.us
 CHDP Director or Deputy Director (Signature) Date Phone Number Email Address

**Children Health Development Program
 INYO County
 Budget Narrative
 Fiscal Year 2020/21**

I. PERSONNEL EXPENSES

Total Salaries:	\$41,827	
Total Benefits:	\$15,936	
Total Personnel Expenses:	\$57,763	Decrease from prior year due to staff changes.

Deputy Director
 Anna Scott
 This position is budgeted at 10% and is unchanged from prior year.

Administrative Analyst
 Amber Williams
 This position is budgeted at 5% and is increased from prior year

Registered Nurse
 Marissa Whitney
 This position is budgeted at 10% and is decreased from prior year.

Prevention Specialist
 Micaela Muro
 This position is budgeted at 5% and is decreased from prior year.

Prevention Specialist
 Tim Villanueva
 This position is budgeted at 45% BPAR and is unchanged from prior year.

II. OPERATING EXPENSES

This is a decrease from the prior year.

Travel \$0

General Office \$24,986
 Basic office supplies, purchase of new filing system and supplies for Nurse. Educational materials, physical activity equipment for prevention services, office rents and copy costs. This is an increase from the prior year.

Motor Pool \$250
 In county travel and travel to and from State Conferences. This is unchanged from the prior year.

Utilities \$1,200
 Includes phone, electricity, gas etc. This is the increased from the prior year.

Internal Charges \$1,590
 Includes Rents and Building and Maintenance expenses. This is an decreased from the prior year.

III. Total Operating Expenses: **\$28,026**

CAPITAL EXPENSES

IV. Total Capital Expenses: **\$0.00** No Capital Expenses planned.

INDIRECT EXPENSES

IV Total Indirect Expenses: **\$798** Rates are set by the CAO. Public Liability insurance, County financial accounting / payroll system. This is an increase from the prior year.



Department of Health Care Services
 Integrated Systems of Care Division
 Health Care Program for Children in Foster Care
 State/Federal
 Budget Summary



Identify State/Federal Funding Source (Base, PMM&O, or Caseload Relief)	Base
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County-City Name:	Inyo County HHS	Fiscal Year:	2020-2021
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Category/Line Item	Total Budget	Enhanced State/Federal (25/75)	Non-Enhanced State/Federal (50/50)
A	(B = C + D)	C	D
I Total Personnel Expenses	\$12,000	\$12,000	\$0
II Total Operating Expenses	\$0	\$0	\$0
III Total Capital Expenses			
IV Total Indirect Expenses	\$0		\$0
V Total Other Expenses			
Budget Grand Total	\$12,000	\$12,000	\$0

Source of Funds	Total Funds	Enhanced State/Federal (25/75)	Non-Enhanced State/Federal (50/50)
E	(F = G + H)	G	H
State Funds	\$3,000	\$3,000	\$0
Federal Funds (Title XIX)	\$9,000	\$9,000	\$0
Budget Grand Total	\$12,000	\$12,000	\$0

Melissa Best-Baker <i>Melissa Best-Baker</i>	12/4/2020	760-878-0232	mbestbaker@inyocounty.us
Prepared By (Print & Sign)	Date	Phone Number	E-mail Address

Anna Scott <i>Anna Scott</i>	12/4/2020	760-873-7868	ascott@inyocounty.us
CHDP Director Or Deputy Director (Print & Sign)	Date	Phone Number	E-mail Address



Department of Health Care Services
 Integrated Systems of Care Division
 Health Care Program for Children in Foster Care
 State/Federal
 Budget Worksheet



Identify State/Federal Funding Source (Base, PMM&O, or Caseload Relief): Base

County-City Name: Inyo County HHS Fiscal Year: 2020-2021

Column					1A	1B	1	2A	2	3A	3
Category/Line Item					% FTE	Annual Salary	Total Budget	% FTE	Enhanced State/Federal (25/75)	% FTE	Non-Enhanced State/Federal (50/50)
I. Personnel Expenses											
#	Last	First	Title	PHN (Y/N)							
1	Weigers	Laura	Public Health Nurse	Y	10.01%	\$88,043	\$8,813.98	100.00%	\$8,814	0.00%	\$0
2						\$0	\$0.00		\$0	100.00%	\$0
3						\$0	\$0.00		\$0	100.00%	\$0
4						\$0	\$0.00		\$0	100.00%	\$0
5						\$0	\$0.00		\$0	100.00%	\$0
6						\$0	\$0.00		\$0	100.00%	\$0
7						\$0	\$0.00		\$0	100.00%	\$0
8						\$0	\$0.00		\$0	100.00%	\$0
9						\$0	\$0.00		\$0	100.00%	\$0
10						\$0	\$0.00		\$0	100.00%	\$0
11						\$0	\$0.00		\$0	100.00%	\$0
12						\$0	\$0.00		\$0	100.00%	\$0
13						\$0	\$0.00		\$0	100.00%	\$0
14						\$0	\$0.00		\$0	100.00%	\$0
15						\$0	\$0.00		\$0	100.00%	\$0
16						\$0	\$0.00		\$0	100.00%	\$0
17						\$0	\$0.00		\$0	100.00%	\$0
18						\$0	\$0.00		\$0	100.00%	\$0
19						\$0	\$0.00		\$0	100.00%	\$0
20						\$0	\$0.00		\$0	100.00%	\$0
Total Number of PHN Staff				1							
Total FTE PHN Staff					0.10%			100.00%		0.00%	
Total Salaries and Wages							\$8,814		\$8,814		\$0
Less Salary Savings							\$0		\$0		\$0
Net Salaries and Wages							\$8,814		\$8,814		\$0
Staff Benefits (Specify %)				36.15%			\$3,186		\$3,186		\$0
I. Total Personnel Expenses							\$12,000		\$12,000		\$0
II. Operating Expenses											
1	Travel			\$0			\$0	0.00%	\$0	100.00%	\$0
2	Training			\$0			\$0	0.00%	\$0	100.00%	\$0
II. Total Operating Expenses							\$0		\$0		\$0
III. Capital Expenses											
III. Total Capital Expenses											
IV. Indirect Expenses											
1	Internal (Specify %)			0.00%			\$0				\$0
2	External										
IV. Total Indirect Expenses							\$0				\$0
V. Other Expenses											
V. Total Other Expenses											
Budget Grand Total							\$12,000		\$12,000		\$0

Melissa Best-Baker *Melissa Best-Baker* 12/4/2020 760-878-0232 mbestbaker@inyocounty.us
 Prepared By (Print & Sign) Date Phone Number E-mail Address

Anna Scott *Anna Scott* 760-873-7868 ascott@inyocounty.us
 CHDP Director Or Deputy Director (Print & Sign) Date Phone Number E-mail Address

**HPCFC-Base
 INYO County
 Budget Narrative
 Fiscal Year 20/21**

I. PERSONNEL EXPENSES

Total Salaries:	\$8,814	
Total Benefits:	\$3,186	
Total Personnel Expenses:	\$12,000	This is the same as the prior year.

Public Health Nurse Laura Weigers	This position is budgeted at 10.0110%. This is a decrease from the prior year.
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II. OPERATING EXPENSES

Travel
 Training

Total Operating Expenses:	\$0	
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III. CAPITAL EXPENSES

Total Capital Expenses:	\$0.00	No Capital Expenses planned
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IV. INDIRECT EXPENSES

Total Indirect Expenses:	\$0	
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V/ OTHER EXPENSES

Total Other Expenses:	\$0	
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BUDGET GRAND TOTAL:	\$12,000	
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Department of Health Care Services
 Integrated Systems of Care Division
 Health Care Program for Children in Foster Care
 State/Federal
 Budget Summary



Identify State/Federal Funding Source (Base, PMM&O, or Caseload Relief)	PMM&O
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County-City Name:	Inyo County HHS	Fiscal Year:	2020-2021
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Category/Line Item	Total Budget	Enhanced State/Federal (25/75)	Non-Enhanced State/Federal (50/50)
A	(B = C + D)	C	D
I Total Personnel Expenses	\$7,333	\$7,333	\$0
II Total Operating Expenses	\$0	\$0	\$0
III Total Capital Expenses			
IV Total Indirect Expenses	\$0		\$0
V Total Other Expenses			
Budget Grand Total	\$7,333	\$7,333	\$0

Source of Funds	Total Funds	Enhanced State/Federal (25/75)	Non-Enhanced State/Federal (50/50)
E	(F = G + H)	G	H
State Funds	\$1,833	\$1,833	\$0
Federal Funds (Title XIX)	\$5,500	\$5,500	\$0
Budget Grand Total	\$7,333	\$7,333	\$0

Melissa Best-Baker <i>Melissa Best-Baker</i>	12/4/2020	760-878-0232	mbestbaker@inyocounty.us
Prepared By (Print & Sign)	Date	Phone Number	E-mail Address

Anna Scott <i>Anna Scott</i>	12/4/2020	760-873-7868	ascott@inyocounty.us
CHDP Director Or Deputy Director (Print & Sign)	Date	Phone Number	E-mail Address



Department of Health Care Services
Integrated Systems of Care Division
Health Care Program for Children in Foster Care
State/Federal
Budget Worksheet



Identify State/Federal Funding Source (Base, PMM&O, or Caseload Relief): PMM&O

County-City Name: Inyo County HHS Fiscal Year: 2020-2021

Column					1A	1B	1	2A	2	3A	3
Category/Line Item					% FTE	Annual Salary	Total Budget	% FTE	Enhanced State/Federal (25/75)	% FTE	Non-Enhanced State/Federal (50/50)
I. Personnel Expenses											
#	Last	First	Title	PHN (Y/N)							
1	Weigers	Laura	Public Health Nurse	Y	6.13%	\$88,043	\$5,393.51	100.00%	\$5,394	0.00%	\$0
2						\$0	\$0.00		\$0	100.00%	\$0
3						\$0	\$0.00		\$0	100.00%	\$0
4						\$0	\$0.00		\$0	100.00%	\$0
5						\$0	\$0.00		\$0	100.00%	\$0
6						\$0	\$0.00		\$0	100.00%	\$0
7						\$0	\$0.00		\$0	100.00%	\$0
8						\$0	\$0.00		\$0	100.00%	\$0
9						\$0	\$0.00		\$0	100.00%	\$0
10						\$0	\$0.00		\$0	100.00%	\$0
11						\$0	\$0.00		\$0	100.00%	\$0
12						\$0	\$0.00		\$0	100.00%	\$0
13						\$0	\$0.00		\$0	100.00%	\$0
14						\$0	\$0.00		\$0	100.00%	\$0
15						\$0	\$0.00		\$0	100.00%	\$0
16						\$0	\$0.00		\$0	100.00%	\$0
17						\$0	\$0.00		\$0	100.00%	\$0
18						\$0	\$0.00		\$0	100.00%	\$0
19						\$0	\$0.00		\$0	100.00%	\$0
20						\$0	\$0.00		\$0	100.00%	\$0
Total Number of PHN Staff				1							
Total FTE PHN Staff					0.06%			100.00%		0.00%	
Total Salaries and Wages							\$5,394		\$5,394		\$0
Less Salary Savings							\$0		\$0		\$0
Net Salaries and Wages							\$5,394		\$5,394		\$0
Staff Benefits (Specify %)				35.94%			\$1,939		\$1,939		\$0
I. Total Personnel Expenses							\$7,333		\$7,333		\$0
II. Operating Expenses											
1	Travel			\$0			\$0	0.00%	\$0	100.00%	\$0
2	Training			\$0			\$0	0.00%	\$0	100.00%	\$0
II. Total Operating Expenses							\$0		\$0		\$0
III. Capital Expenses											
III. Total Capital Expenses											
IV. Indirect Expenses											
1	Internal (Specify %)			0.00%			\$0				\$0
2	External										
IV. Total Indirect Expenses							\$0				\$0
V. Other Expenses											
V. Total Other Expenses											
Budget Grand Total							\$7,333		\$7,333		\$0

Melissa Best-Baker	<i>Melissa Best-Baker</i>	12/4/2020	760-878-0232	mbestbaker@inyocounty.us
	Prepared By (Print & Sign)	Date	Phone Number	E-mail Address
Anna Scott	<i>Anna Scott</i>		760-873-7868	ascott@inyocounty.us
	CHDP Director Or Deputy Director (Print & Sign)	Date	Phone Number	E-mail Address

**HPCFC-PMM&O
 INYO County
 Budget Narrative
 Fiscal Year 20/21**

I. PERSONNEL EXPENSES

Total Salaries:	\$5,394	
Total Benefits:	\$1,939	
Total Personnel Expenses:	\$7,333	This is the same as the prior year.

Public Health Nurse Laura Weigers	This position is budgeted at 6.1260%. This is a decrease from the prior year.
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II. OPERATING EXPENSES

Travel
 Training

Total Operating Expenses:	\$0	
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III. CAPITAL EXPENSES

Total Capital Expenses:	\$0.00	No Capital Expenses planned
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IV. INDIRECT EXPENSES

	\$0	
Total Indirect Expenses:	\$0	

V/ OTHER EXPENSES

Total Other Expenses:	\$0	
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BUDGET GRAND TOTAL:	\$7,333	
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Department of Health Care Services
 Integrated Systems of Care Division
 Health Care Program for Children in Foster Care
 State/Federal
 Budget Summary



Identify State/Federal Funding Source (Base, PMM&O, or Caseload Relief)	Caseload Relief
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County-City Name:	Inyo County HHS	Fiscal Year:	2020-2021
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Category/Line Item	Total Budget	Enhanced State/Federal (25/75)	Non-Enhanced State/Federal (50/50)
A	(B = C + D)	C	D
I Total Personnel Expenses	\$4,644	\$4,644	\$0
II Total Operating Expenses	\$0	\$0	\$0
III Total Capital Expenses			
IV Total Indirect Expenses	\$0		\$0
V Total Other Expenses			
Budget Grand Total	\$4,644	\$4,644	\$0

Source of Funds	Total Funds	Enhanced State/Federal (25/75)	Non-Enhanced State/Federal (50/50)
E	(F = G + H)	G	H
State Funds	\$1,161	\$1,161	\$0
Federal Funds (Title XIX)	\$3,483	\$3,483	\$0
Budget Grand Total	\$4,644	\$4,644	\$0

Melissa Best-Baker <i>Melissa Best-Baker</i>	12/4/2020	760-878-0232	mbestbaker@inyocounty.us
Prepared By (Print & Sign)	Date	Phone Number	E-mail Address

Anna Scott <i>Anna Scott</i>	12/4/2020	760-873-7868	ascott@inyocounty.us
CHDP Director Or Deputy Director (Print & Sign)	Date	Phone Number	E-mail Address



Department of Health Care Services
 Integrated Systems of Care Division
 Health Care Program for Children in Foster Care
 State/Federal
 Budget Worksheet



Identify State/Federal Funding Source (Base, PMM&O, or Caseload Relief): Caseload Relief

County-City Name: Inyo County HHS Fiscal Year: 2020-2021

Column					1A	1B	1	2A	2	3A	3
Category/Line Item					% FTE	Annual Salary	Total Budget	% FTE	Enhanced State/Federal (25/75)	% FTE	Non-Enhanced State/Federal (50/50)
I. Personnel Expenses											
#	Last	First	Title	PHN (Y/N)							
1	Weigers	Laura	Public Health Nurse	Y	3.86%	\$88,043	\$3,400.22	100.00%	\$3,400	0.00%	\$0
2						\$0	\$0.00		\$0	100.00%	\$0
3						\$0	\$0.00		\$0	100.00%	\$0
4						\$0	\$0.00		\$0	100.00%	\$0
5						\$0	\$0.00		\$0	100.00%	\$0
6						\$0	\$0.00		\$0	100.00%	\$0
7						\$0	\$0.00		\$0	100.00%	\$0
8						\$0	\$0.00		\$0	100.00%	\$0
9						\$0	\$0.00		\$0	100.00%	\$0
10						\$0	\$0.00		\$0	100.00%	\$0
11						\$0	\$0.00		\$0	100.00%	\$0
12						\$0	\$0.00		\$0	100.00%	\$0
13						\$0	\$0.00		\$0	100.00%	\$0
14						\$0	\$0.00		\$0	100.00%	\$0
15						\$0	\$0.00		\$0	100.00%	\$0
16						\$0	\$0.00		\$0	100.00%	\$0
17						\$0	\$0.00		\$0	100.00%	\$0
18						\$0	\$0.00		\$0	100.00%	\$0
19						\$0	\$0.00		\$0	100.00%	\$0
20						\$0	\$0.00		\$0	100.00%	\$0
Total Number of PHN Staff				1							
Total FTE PHN Staff					0.04%			100.00%		0.00%	
Total Salaries and Wages							\$3,401		\$3,401		\$0
Less Salary Savings							\$0		\$0		\$0
Net Salaries and Wages							\$3,401		\$3,401		\$0
Staff Benefits (Specify %)				36.53%			\$1,243		\$1,243		\$0
I. Total Personnel Expenses							\$4,644		\$4,644		\$0
II. Operating Expenses											
1	Travel			\$0			\$0	0.00%	\$0	100.00%	\$0
2	Training			\$0			\$0	0.00%	\$0	100.00%	\$0
II. Total Operating Expenses							\$0		\$0		\$0
III. Capital Expenses											
III. Total Capital Expenses											
IV. Indirect Expenses											
1	Internal (Specify %)			0.00%			\$0				\$0
2	External										
IV. Total Indirect Expenses							\$0				\$0
V. Other Expenses											
V. Total Other Expenses											
Budget Grand Total							\$4,644		\$4,644		\$0

Melissa Best-Baker *Melissa Best-Baker* 12/4/2020 760-878-0232 mbestbaker@inyocounty.us
 Prepared By (Print & Sign) Date Phone Number E-mail Address

Anna Scott *Anna Scott* CHDP Director Or Deputy Director (Print & Sign) 760-873-7868 ascott@inyocounty.us
 Date Phone Number E-mail Address

**HPCFC-Case Load Relief
 INYO County
 Budget Narrative
 Fiscal Year 20/21**

I. PERSONNEL EXPENSES

Total Salaries:	\$3,401	
Total Benefits:	\$1,243	
Total Personnel Expenses:	\$4,644	This is new this year.

Public Health Nurse Laura Weigers	This position is budgeted at 3.863%. This is new this year.
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II. OPERATING EXPENSES

Travel
 Training

Total Operating Expenses:	\$0	
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III. CAPITAL EXPENSES

Total Capital Expenses:	\$0.00	No Capital Expenses planned
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IV. INDIRECT EXPENSES

Total Indirect Expenses:	\$0	
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V/ OTHER EXPENSES

Total Other Expenses:	\$0	
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BUDGET GRAND TOTAL:	\$4,644	
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CCS CASELOAD	Actual Caseload	Percent of Total CCS Caseload
STRAIGHT CCS - Total Cases of Open (Active) Straight CCS Children	15	13.39%
OTLIPC - Total Cases of Open (Active) OTLIPC Children	15	13.39%
MEDI-CAL - Total Cases of Open (Active) Medi-Cal (non-OTLIPC) Children	82	73.21%
TOTAL CCS CASELOAD	112	100%

CCS Administrative Baseline Budget Summary

Fiscal Year: 2020-21
County: Inyo

	Col 1 = Col 2+3+4	Straight CCS	OTLIPC	Medi-Cal (non-OTLIPC) (Column 4 = Columns 5 + 6)		
Column	1	2	3	4	5	6
Category/Line Item	Total Budget	Straight CCS County/State (50/50)	Optional Targeted Low Income Children's Program (OTLIPC) County/State/Fed (11.75/11.75/76.5)	Medi-Cal State/Federal	Enhanced Medi-Cal State/Federal (25/75)	Non-Enhanced Medi-Cal State/Federal (50/50)
I. Total Personnel Expense	86,468	11,580	11,580	63,306	0	63,306
II. Total Operating Expense	2,565	343	343	1,878	0	1,878
III. Total Capital Expense	0	0	0	0		0
IV. Total Indirect Expense	1,339	179	179	980		980
V. Total Other Expense	13,000	1,741	1,741	9,518		9,518
Budget Grand Total	103,372	13,843	13,843	75,682	0	75,682

	Col 1 = Col 2+3+4	Straight CCS	OTLIPC	Medi-Cal (non-OTLIPC) (Column 4 = Columns 5 + 6)		
Column	1	2	3	4	5	6
Source of Funds	Total Budget	Straight CCS County/State (50/50)	Optional Targeted Low Income Children's Program (OTLIPC) County/State/Fed (11.75/11.75/76.5)	Medi-Cal State/Federal	Enhanced Medi-Cal State/Federal (25/75)	Non-Enhanced Medi-Cal State/Federal (50/50)
Straight CCS						
State	6,921	6,921				
County	6,922	6,922				
OTLIPC						
State	1,627		1,627			
County	1,627		1,627			
Federal (Title XXI)	10,589		10,589			
Medi-Cal						
State	37,841			37,841	0	37,841
Federal (Title XIX)	37,841			37,841	0	37,841

Melissa Best-Baker

Melissa Best-Baker

mbestbaker@inyocounty.us

Prepared By (Signature)

Prepared By (Printed Name)

Email Address

Marissa Whitney

Marissa Whitney

mhobbs@inyocounty.us

CCS Administrator (Signature)

CCS Administrator (Printed Name)

Email Address

CCS CASELOAD	Actual Caseload	Percent of Total CCS Caseload
STRAIGHT CCS - Total Cases of Open (Active) Straight CCS Children	15	13.39%
OTLICP - Total Cases of Open (Active) OTLICP Children	15	13.39%
MEDI-CAL - Total Cases of Open (Active) Medi-Cal (non-OTLICP) Children	82	73.21%
TOTAL CCS CASELOAD	112	100%

CCS Administrative Baseline Budget Worksheet

Fiscal Year: 2020-21

County: Inyo

Column				Straight CCS		Optional Targeted Low Income Children's Program (OTLICP)		Medi-Cal (Non-OTLICP)					
	1	2	3	4A	4	5A	5	6A	6	7A	7	8A	8
Category/Line Item	% FTE	Annual Salary	Total Budget (1 x 2 or 4 + 5 + 6)	Caseload %	Straight CCS County/State (50/50)	Caseload %	Optional Targeted Low Income Children's Program (OTLICP) Co/State/Fed (11.75/11.75/76.5)	Caseload %	Medi-Cal State/Federal	Enhanced % FTE	Enhanced Medi-Cal State/Federal (25/75)	Non-Enhanced % FTE	Non-Enhanced Medi-Cal State/Federal (50/50)
I. Personnel Expense													
Program Administration													
1. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0			100.00%	0
2. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0			100.00%	0
3. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0			100.00%	0
4. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0			100.00%	0
5. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0			100.00%	0
Subtotal		0	0		0		0		0				0
Medical Case Management													
1. Whiney, Marissa, Registered Nurse	10.00%	83,906	8,391	13.39%	1,124	13.39%	1,124	73.21%	6,143	0.00%	0	100.00%	6,143
2. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
3. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
4. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
5. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
6. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
7. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
8. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
Subtotal		83,906	8,391		1,124		1,124		6,143		0		6,143
Other Health Care Professionals													
1. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
2. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
3. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
Subtotal		0	0		0		0		0		0		0
Ancillary Support													
1. Nora Rudder, HHS Specialist	75.00%	53,867	40,400	13.39%	5,411	13.39%	5,411	73.21%	29,579			100.00%	29,579
2. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0			100.00%	0
3. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0			100.00%	0
4. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0			100.00%	0
5. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0			100.00%	0
Subtotal		53,867	40,400		5,411		5,411		29,579				29,579
Clerical and Claims Support													
1. Marjie Chapman, Office Tech III	3.00%	53,603	1,608	13.39%	215	13.39%	215	73.21%	1,177	0.00%	0	100.00%	1,177
2. Amber Williams, Admin Analyst	5.00%	66,225	3,311	13.39%	443	13.39%	443	73.21%	2,424	0.00%	0	100.00%	2,424
3. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
4. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
5. Employee Name, Position	0.00%	0	0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
Subtotal		119,828	4,919		658		658		3,601		0		3,601

CCS CASELOAD	Actual Caseload	Percent of Total CCS Caseload
STRAIGHT CCS - Total Cases of Open (Active) Straight CCS Children	15	13.39%
OTLICP - Total Cases of Open (Active) OTLICP Children	15	13.39%
MEDI-CAL - Total Cases of Open (Active) Medi-Cal (non-OTLICP) Children	82	73.21%
TOTAL CCS CASELOAD	112	100%

CCS Administrative Baseline Budget Worksheet

Fiscal Year: 2020-21

County: Inyo

Column	1	2	3	Straight CCS		Optional Targeted Low Income Children's Program (OTLICP)		Medi-Cal (Non-OTLICP)					
				4A	4	5A	5	6A	6	7A	7	8A	8
Category/Line Item	% FTE	Annual Salary	Total Budget (1 x 2 or 4 + 5 + 6)	Caseload %	Straight CCS County/State (50/50)	Caseload %	Optional Targeted Low Income Children's Program (OTLICP) Co/State/Fed (11.75/11.75/76.5)	Caseload %	Medi-Cal State/Federal	Enhanced % FTE	Enhanced Medi-Cal State/Federal (25/75)	Non-Enhanced % FTE	Non-Enhanced Medi-Cal State/Federal (50/50)
Total Salaries and Wages			53,710	13.39%	7,193	13.39%	7,193	73.21%	39,323	0.00%	0	100.00%	39,323
Staff Benefits (Specify %)	60.99%		32,758	13.39%	4,387	13.39%	4,387	73.21%	23,983		0		23,983
I. Total Personnel Expense			86,468	13.39%	11,580	13.39%	11,580	73.21%	63,306		0		63,306
II. Operating Expense													
1. Travel			0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
2. Training			0	13.39%	0	13.39%	0	73.21%	0	0.00%	0	100.00%	0
3. General Operating			612	13.39%	82	13.39%	82	73.21%	448				448
4. Professional Services			153	13.39%	20	13.39%	20	73.21%	112			100.00%	112
5. Utilities			1,800	13.39%	241	13.39%	241	73.21%	1,318			100.00%	1,318
6.				13.39%	0	13.39%	0	73.21%	0			100.00%	0
7.				13.39%	0	13.39%	0	73.21%	0			100.00%	0
II. Total Operating Expense			2,565		343		343		1,878		0		1,878
III. Capital Expense													
1.				13.39%	0	13.39%	0	73.21%	0				0
2.				13.39%	0	13.39%	0	73.21%	0				0
3.				13.39%	0	13.39%	0	73.21%	0				0
III. Total Capital Expense			0		0		0		0				0
IV. Indirect Expense													
1. Indirect Cost Rate	1.55%		1,339	13.39%	179	13.39%	179	73.21%	980			100.00%	980
			0	13.39%	0	13.39%	0	73.21%	0			100.00%	0
IV. Total Indirect Expense			1,339		179		179		980				980
V. Other Expense													
1. Maintenance & Transportation			13,000	13.39%	1,741	13.39%	1,741	73.21%	9,518			100.00%	9,518
2.				13.39%	0	13.39%	0	73.21%	0			100.00%	0
3.				13.39%	0	13.39%	0	73.21%	0			100.00%	0
4.				13.39%	0	13.39%	0	73.21%	0			100.00%	0
5.				13.39%	0	13.39%	0	73.21%	0			100.00%	0
V. Total Other Expense			13,000		1,741		1,741		9,518				9,518
Budget Grand Total			103,372		13,843		13,843		75,682		0		75,682

Melissa Best-Baker

Prepared By (Signature)

Melissa Best-Baker

Prepared By (Printed Name)

5/20/2020

Date Prepared

760-878-0232

Phone Number

Marissa Whitney

CCS Administrator (Signature)

Marissa Whitney

CCS Administrator (Printed Name)

5/20/2020

Date Signed

760-873-7868

Phone Number

Fair Political Practices Commission

Contribution Limits: City and County Candidates¹

Introduction

Pursuant to Assembly Bill 571 (Stats. 2019, Ch. 556, AB 571 Mullin), beginning January 1, 2021 a state campaign contribution limit will by default apply to city and county candidates when the city or county has not already enacted a contribution limit on such candidates. Along with the new campaign contribution limit, there are also other related provisions that formerly applied only to state level candidates that will now apply to city and county candidates. Please note that none of the provisions of AB 571 discussed in this fact sheet apply to candidates in cities or counties for which the city or county has enacted campaign contribution limits.

Current State Contribution Limit

The contribution limit that will now apply to city and county candidates pursuant to AB 571 is updated biennially for inflation. Contribution limits can be found in Regulation 18545(a)² and on the FPPC website [here](#). The default limit for contributions to city and county candidates subject to AB 571 for 2021-2022 is set at \$4,900 per election.

Other Amended Provisions Affecting City and County Candidates

Several other provisions will now apply to city and county candidates in jurisdictions that have not enacted campaign contribution limits, including the following:

- A candidate may not make a contribution over the AB 571 limit to another candidate in jurisdictions subject to the AB 571 limit.
- Candidates may transfer campaign funds from one candidate-controlled committee to another committee controlled by the same candidate if the committee receiving the transfer is for an elective state, county or city office. However, contributions transferred must be transferred using the “last in, first out” or “first in, first out” accounting method and shall not exceed the applicable contribution limit per contributor.

¹ This fact sheet is informational only and contains only highlights of selected provisions of the law. It does not carry the weight of the law. For further information, consult the Political Reform Act and its corresponding regulations, advice letters, and opinions.

² The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

- Candidates may not personally loan to a candidate’s campaign an amount for which the outstanding balance exceeds \$100,000. A candidate may not charge interest on any such loan the candidate made to the candidate’s campaign.
- Candidates may establish a committee to oppose the qualification of a recall measure and the recall election when the candidate receives a notice of intent to recall. Campaign funds raised to oppose the qualification of a recall measure and/or the recall election would not be subject to any campaign contribution limit under the Act.
- Contributions after the date of the election may be accepted to the extent contributions do not exceed net debts outstanding from the election, and contributions do not otherwise exceed applicable contribution limits for that election.
- Candidates may carry over contributions raised in connection with one election to pay for campaign expenditures incurred in connection with a subsequent election for the same office.
- Candidates are permitted to raise contributions for a general election before the primary election and may establish separate campaign contribution accounts for the primary and general so long as candidates set aside contributions and use them for the general or special general election as raised. If the candidate is defeated in the primary election or otherwise withdraws from the general election, the general election funds must be refunded to contributors on a pro rata basis less any expenses associated with the raising and administration of the general election contributions.

FAQs

A. If a city or county does not currently have contribution limits set within their ordinance would the state contribution limit be the default?

Yes. The state contribution limit stated above would be the default contribution limit if the city or county ordinance is silent on whether there are contribution limits within that jurisdiction or if there is no city or county ordinance in place.

B. Is there a way for a city or county to adopt “no” contribution limits for city or county elective city and county offices?

Yes. A city or county may elect to have “no” contribution limits. To do so, it must explicitly state in the city or county ordinance that there are no limits on contributions. If it is explicit that the city or county has implemented “no” contribution limits, the state contribution limit will not apply as a default for that jurisdiction.

C. Can a city or county ordinance be less restrictive than the AB 571 limit (e.g., the city or county limit is set higher than the state limit)?

Yes. A city or county can set contribution limits higher than the default state limit.

D. If a city or county imposes contribution limits, is the Commission responsible for enforcing those limits?

No. The Commission will not regulate the administration or enforcement of the penalties. Cities or counties with existing limits or that adopt their own limits are not subject to the state limit and may impose their own penalties for violations, as.

E. If a city or county has voluntary contribution limits, but no mandatory limits will the state limit be applicable?

Yes. A city or county must enact mandatory limits to avoid the state limit applying to elective city and county offices.

F. Does the default contribution limit also include judicial candidates?

No. Elective city and county offices do not include judicial offices.

G. If a city or county has imposed contribution limits for particular city or county offices (e.g., Board of Supervisors), do those limits also apply to other positions such as the District Attorney or would the default state limit apply if a particular position is not specifically addressed by the city or county?

The default state limit would apply to other positions for which the city or county has not set contribution limits. A city or county ordinance must explicitly state the city or county contribution limits and for which elective offices those limits will apply. A city or county may adopt a general provision implementing a contribution limit for all elective city and county offices in that jurisdiction. As noted above, a city or county may also adopt an ordinance that states the city or county is adopting no contribution limits for any offices to avoid the default state limit applying.

H. Does AB 571 apply to special district or school district elections?

No. AB 571 applies only to city and county elections for offices that a city or county has not implemented its own contribution limit.

I. Does AB 571 allow candidates to open an officeholder committee?

No. For those candidates subject to AB 571, officeholder committees are not permitted. However, a candidate may use a committee for the officeholder's future election for officeholder expenses.

**AGREEMENT BETWEEN COUNTY OF INYO
AND JERRY OSER
FOR THE PROVISION OF PERSONAL SERVICES
AS A COUNTY DEPARTMENT HEAD**

INTRODUCTION

WHEREAS Jerry Oser_ (hereinafter referred to as "Department Head") has been duly appointed as - Environmental Health Director for Inyo County; and

WHEREAS, The County of Inyo (hereinafter referred to as "County") and Department Head desire to set forth the manner and means by which Department Head will be compensated for performance of duties;

NOW THEREFORE, in consideration of the mutual promises, covenants, terms, and conditions hereinafter contained, County and Department Head hereby agree as follows:

TERMS AND CONDITIONS

1. SCOPE OF WORK.

The Department Head shall furnish to the County, those services and work set forth in Attachment A, attached hereto and by reference incorporated herein.

Services and work provided by the Department Head under this Agreement will be performed in a manner consistent with the requirements and standards established by applicable federal, state, and County laws, ordinances, resolutions, and directions.

2. TERM.

The term of this Agreement shall be from January 7, 2020 until terminated as provided below.

3. CONSIDERATION.

A. Compensation. County shall pay Department Head in accordance with the Schedule of Fees (set forth as Attachment B) for the services and work described in Attachment A which are performed by Department Head.

B. Travel and Per Diem. County shall reimburse Department Head for the travel expenses and per diem which Department Head incurs in providing services and work under this Agreement. Travel and per diem expenses will be reimbursed in accordance with the rates set forth in the Schedule of Travel and Per Diem Payment (Attachment C). County reserves the right to deny reimbursement to Department Head for travel or per diem expenses which are either in excess of the amounts that may be paid under the rates set forth in Attachment C, or which are incurred by the Department Head without the proper approval of the County.

C. No Additional Consideration. Except as expressly provided in this Agreement, Department Head shall not be entitled to, nor receive, from County, any additional consideration, compensation, salary, wages, or other type of remuneration for services rendered under this Agreement.

D. Manner of Payment. Department Head will be paid in the same manner and on the same schedule of frequency as other County Department Heads and employees.

E. Federal and State Taxes. From all payments made to Department Head by County under the terms and provisions of this Agreement, County shall withhold all appropriate federal and state income taxes (resident and non-resident).

4. WORK SCHEDULE.

Department Head's obligation is to perform the services and work identified in Attachment A which are needed within the County. It is understood by Department Head that the performance of these services and work will require a varied schedule. Department Head, in arranging his schedule, will coordinate and make arrangements to fulfill the requirements of the services and work which is necessary.

5. REQUIRED LICENSES, CERTIFICATES, AND PERMITS.

Any licenses, certificates, or permits required by the federal, state, county, or municipal governments for Department Head to provide the services and work described in Attachment A must be procured by Department Head and be valid at the time Department Head enters into this Agreement. Further, during the term of this Agreement, Department Head must maintain such licenses, certificates, and permits in full force and effect. Licenses, certificates, and permits may include, but are not limited to, driver's licenses, and professional licenses or certificates. The County will pay the cost of the licenses, certificates, and permits necessary for Department Head to perform duties as a Registered Environmental Health Specialist (REHS). All other licenses, certificates, and permits will be procured and maintained in force by Department Head at no expense to the County. Department Head will provide County, at County's request, with evidence of current and valid licenses, certificates and permits which are required to perform the services identified in Attachment A. Where there is a dispute between Department Head and County as to what licenses, certificates, and permits are required to perform the services identified in Attachment A, County reserves the right to make such determinations for purposes of this Agreement.

6. OFFICE SPACE, SUPPLIES, EQUIPMENT, ETC.

County shall provide Department Head with such supplies, reference materials, telephone service, and staff as is deemed necessary by the County for Department Head to provide the services identified in Attachment A to this Agreement.

7. COUNTY PROPERTY.

A. Supplies, Equipment, etc. All supplies, equipment, tools, protective or safety devices, badges, identification cards, keys, uniforms, vehicles, reference materials, furniture, appliances, etc. provided to Department Head by County pursuant to this Agreement are, and at the termination of this Agreement remain, the sole and exclusive property of County. Department Head will use reasonable care to protect, safeguard and maintain such items while they are in Department Head's possession.

B. Products of Department Head's Work and Services. Any and all compositions, publications, plans, designs, specifications, blueprints, maps, formulas, processes, photographs, slides, video tapes, computer programs, computer disks, computer tapes, memory chips, soundtracks, audio recordings, films, audio-visual presentations, exhibits, reports, studies, works of art, inventions, patents, trademarks, copyrights, or intellectual properties of any kind which are created, produced, assembled, compiled by, or are the result or product of, Department Head's services or work under this Agreement are, and at the termination of this Agreement remain, the sole and exclusive property of the County. At the termination of the Agreement, Department Head will convey possession and title to all such properties to County.

County of Inyo Standard Contract - No. 202 modified
(Appointed County Department Head)

8. WORKERS' COMPENSATION.

County shall provide workers' compensation coverage to Department Head for all acts performed in the course and scope of providing the services described in Attachment A to this Agreement. In the event a claim is made by Department Head for injuries received in the course and scope of providing such services, County's liability shall be limited to workers' compensation benefits payable under the California Labor Code.

9. STATUS OF DEPARTMENT HEAD.

All acts of Department Head relating to the performance of this Agreement shall be performed by Department Head as the Environmental Health Director of the County. Department Head has no authority to bind, incur any obligation on behalf of, or exercise any right or power vested in, the County, except as expressly provided by law or set forth in Attachment A.

10. DEFENSE AND INDEMNIFICATION.

In the event the Department Head is sued for acts performed within the course and scope of providing services and work described in Attachment A of this Agreement, County shall defend, indemnify, and hold the Department Head harmless from any and all liability arising from such acts as required by law.

11. TERMINATION AND DISCIPLINE.

Department Head's services under this Agreement may be terminated by County without cause, and at will, for any reason by giving to Department Head 180 days (180) days written notice of such intent to terminate.

Department Head may terminate this Agreement without cause, and at will, for any reason whatsoever by giving thirty (30) days written notice of such intent to terminate to County.

12. ASSIGNMENT.

This is an agreement for the personal services of Department Head. County has relied upon the skills, knowledge, experience, and training of Department Head as an inducement to enter into this Agreement. Department Head shall not assign or subcontract this Agreement, or any part of it, without the express written consent of the County.

13. NONDISCRIMINATION.

Department Head agrees to comply with various provisions of the federal, state, and county statutes, laws, and ordinances applicable to the County, and providing that no person in the United States shall, on the grounds of race, color, religion, ancestry, sex, age, physical handicap, or national origin, be subjected to discrimination.

14. CONFIDENTIALITY.

Department Head agrees to comply with various provisions of the federal, state, and county laws and ordinances providing that information and records kept, maintained, or accessible by the County, shall be

privileged, restricted, or confidential. Disclosure of such confidential, privileged, or protected information shall be made by Department Head only as allowed by law.

15. CONFLICTS.

Department Head agrees that she has no interest, and shall not acquire any interest, direct or indirect, which would conflict in any manner or degree with the performance of the work and services under this Agreement. Department Head agrees to complete and file appropriate conflict of interest statements.

16. POST AGREEMENT COVENANT.

Department Head agrees not to use any confidential, protected, or privileged information which is gained from the County in the course of providing services and work under this Agreement, for any personal benefit, gain, or enhancement. Further, Department Head agrees for a period of two years after the termination of this Agreement, not to seek or accept any employment with any entity, association, corporation, or person who, during the term of this Agreement, has had an adverse or conflicting interest with the County, or who has been an adverse party in litigation with the County, and concerning such, Department Head by virtue of this Agreement has gained access to the County's confidential, privileged, protected, or proprietary information.

17. AMENDMENT.

This Agreement may be modified, amended, changed, added to, or subtracted from, by the mutual consent of the parties hereto, if such amendment or change is in written form, and executed with the same formalities as this Agreement, and attached to the original Agreement to maintain continuity.

18. NOTICE.

Any notice, amendments, or additions to this Agreement, including change of address of either party during the term of this Agreement, which Department Head or County shall be required, or may desire, to make shall be in writing and shall be sent by prepaid first class mail to the respective parties as follows:

County of Inyo
County Administrator _____ Department
P.O. Drawer N _____ Mailing Address
Independence, CA 93526 _____ City and State

Department Head:
Jerry Oser _____ Name
3594 Gerkin Road _____ Street
Bishop, CA 93514 _____ City and State

19. ENTIRE AGREEMENT.

This Agreement contains the entire agreement of the parties, and no representations, inducements, promises, or agreements otherwise between the parties not embodied herein or incorporated herein by reference, shall be of any force or effect. Further, no term or provision hereof may be changed, waived, discharged, or terminated, unless the same be in writing executed by the parties hereto.

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**AGREEMENT BETWEEN COUNTY OF INYO
AND JERRY OSER
FOR THE PROVISION OF PERSONAL SERVICES
AS A COUNTY DEPARTMENT HEAD**

IN WITNESS THEREOF, THE PARTIES HERETO HAVE SET THEIR HANDS AND SEALS THIS
7 DAY OF January, 2021.


COUNTY OF INYO

DEPARTMENT HEAD

By: _____

By: Jerry Oser
Print or Type Name

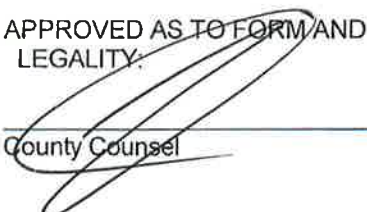
Dated: _____



Signature

Dated: 12/30/20

APPROVED AS TO FORM AND
LEGALITY:



County Counsel

APPROVED AS TO ACCOUNTING
FORM:

County Auditor

APPROVED AS TO PERSONNEL
REQUIREMENTS:



Personnel Services

ATTACHMENT A

**AGREEMENT BETWEEN COUNTY OF INYO
AND JERRY OSER
FOR THE PROVISION OF PERSONAL SERVICES
AS A COUNTY DEPARTMENT HEAD**

TERM:

FROM: January 7, 2021 **TO:** Termination

SCOPE OF WORK:

Department Head shall perform the duties and responsibilities as identified in the job description for Environmental Health Director attached hereto.



THE COUNTY OF INYO

INVITES APPLICATIONS FOR

**DIRECTOR,
ENVIRONMENTAL HEALTH
SERVICES**



FINAL APPLICATION FILING DATE:

Open Until Filled



THE POSITION

The Director of Environmental Health Services is responsible to the Board of Supervisors for managing and directing all aspects of the Department of Environmental Health Services. The Department of Environmental Health Services' programs include food sanitation, community water supply systems, well construction, County-operated water testing laboratory, on-site wastewater disposal, hazardous waste management and integrated waste management regulations, and recreational health.

NATURE OF WORK

Plans, directs, manages, and oversees the functions, operations, and programs of the Department; ensures the effective and reasonable enforcement of laws and regulations pertaining to environmental health and related programs; oversees and participates in the development and implementation of departmental goals, objectives, policies, and priorities; assesses and recommends solutions to complex problems affecting departmental operations and functions; selects, directs, supervises, trains, and evaluates staff; develops and administers assigned budgets, prepares budget requests, and controls expenditures; confers with local and State officials regarding environmental health issues; represents the Department to the public, community organizations, and other governmental agencies; makes decisions regarding enforcement of departmental programs; conducts public information activities; oversees the preparation of and prepares reports and presentations on assigned functions and activities; maintains contact with the press and community organizations; interprets program policy in handling situations involving the public; conducts compliance inspections and field work; establishes and maintains effective working relationships with others; other related

duties as required.

THE IDEAL CANDIDATE

Important qualifications will include the ability to develop and maintain a close working relationship with the Board of Supervisors and other department heads; strong communication skills; and an ability to relate well to the public, management, and employees at all levels. In addition, the successful candidate must:

- ◇ Be professional and highly ethical;
- ◇ Be a leader and team player;
- ◇ Be result oriented and proactive;
- ◇ Be fiscally responsible;
- ◇ Have effective presentation skills;
- ◇ Be approachable;
- ◇ Be willing to take reasonable risks;
- ◇ Implement Board decisions promptly as if they were his/her own;
- ◇ Keep the Board fully and regularly informed;
- ◇ Be able to work effectively with the media;
- ◇ Be a "quick study" capable of becoming highly productive immediately;
- ◇ Be a team player and good listener;
- ◇ Provide excellent customer service.

Has the Skills to:

Plan, direct, manage, and oversee the programs, functions, and operations of the department; formulate and implement Countywide inspection and enforcement programs; supervise, train, and evaluate the work of assigned staff; develop and prepare an assigned budget and control expenditures; prepare and present accurate and comprehensive reports and recommendations; analyze problems, identify alternative solutions,

project consequences of proposed actions, and implement recommendations in support of goals; interpret, apply, and explain policies, procedures, laws, and regulations pertaining to assigned programs and functions; effectively represent the Department of Environmental Health Services programs to the public, community organizations, and other governmental agencies; promote and maintain positive public relations and possess above-average oral and written communication skills.

Has the Knowledge of:

Operational characteristics and functions of an environmental health program; principles and techniques of management and program administration; principles and practices of environmental quality control, public health, and sanitation; pertinent Federal, State, and local laws, codes and regulations; functions and operations of governmental agencies concerned with environmental quality control; proper inspection and investigative methods and procedures; principles and practices of budget development, preparation and expenditure control; principles and practices of supervision, training, and performance evaluation.

Has the Physical Ability to:

Drive a motor vehicle for prolonged periods of time; work out-of-doors in the elements with extremes in exposure to heat, sun, cold, wind, and blowing dust; stand, walk, or crouch; climb and descend stairs and ladders; lift and move objects weighing up to 75 pounds; normal manual dexterity and eye-hand coordination; corrected hearing and vision to normal range; verbal communication; use of office equipment; continuous contact with staff and the public.

Can meet these Special Requirements:

You may be required to drive a motor vehicle in the course of employment and must possess a valid operator's license issued by the State Department of Motor Vehicles. Must successfully complete a pre-employment background investigation and physical examination. Your position may be required to serve as a Disaster Service Worker during a County emergency.

EMPLOYMENT STANDARDS

Must possess a Bachelor's degree from an accredited college or university with major coursework in environmental health or a closely related field (a Master's degree is desirable), plus a valid certificate of registration as an Environmental Health specialist issued by the California Department of Health Services, with a minimum of five years of experience in environmental health investigation, inspection, and enforcement work, including a minimum of two years in a supervisory capacity.

SALARY AND BENEFITS

SALARY:

\$96,000-\$120,000/year

(Above salary is paid over 26 pay periods annually.)

BENEFITS:

- ◇ CalPERS Retirement System:
Classic Employees (certain current or recently employed CalPERS members and members of other retirement systems with CalPERS reciprocity, who enrolled in such systems prior to January 1, 2013) 2% at 55 – Inyo County pays the employee contribution rate toward retirement.
- PEPRA Employees** (new CalPERS members hired after January 1, 2013) 2% at 62. Employees will be required to pay employee contribution toward retirement.
- ◇ Inyo County pays a portion (currently 80%) of employee and dependent monthly premium on CalPERS medical plans.
- ◇ 100% of employee and dependent monthly premium paid for dental and vision.
- ◇ \$20,000 term life insurance policy on employee.
- ◇ Retiree health care benefits.
- ◇ Vacation—10 days per year during the first three years; 15 days per year after three years; 1 additional day for each year of service after ten years to a maximum of 25 days per year.
- ◇ Sick leave—15 days per year.
- ◇ Flex (personal days)—5 days per fiscal year.
- ◇ Paid holidays—11 per year.



population centers, it more than makes up for in recreational opportunities.

Inyo County is the second largest county in California, with a size of 6,490,200 acres, over 10,000 square miles. Included in this large area is a population base of approximately 17,945. Inyo County is a rural county that is proud of its excellent schools and family environment.

The City of Bishop is the only incorporated city in the County and the Bishop area has a population of approximately 12,000. There are several smaller unincorporated towns throughout Inyo County. Inyo County has been called the "outdoor adventure capital of the world".

APPLICATION

Applicants may write or call for an application at Inyo County Personnel Department, P.O. Box 249, Independence, CA 93526, (760) 878-0377. Application information is also available at the Inyo County website, www.inyocounty.us.

This recruitment will remain open until position has been filled. Applicants must apply on the Inyo County application form. A cover letter and/or resume will be accepted in addition to the application form, but will not serve as a substitute for a completed application. Incomplete applications will not be processed. **It is not acceptable to complete the application with statements such as "See/Refer to Resume".**

SELECTION

Candidates must clearly demonstrate through their application materials that they meet all employment standards outlined. All properly completed applications will be reviewed and the most appropriately qualified individuals will be invited to continue in the selection process.

Examination for the position may consist of a written, performance, or oral exam(s) to evaluate the applicant's skill, training, experience, and qualifications for the position. The final hiring selection will be made by the Board of Supervisors.

Conflict of interest: Persons hired as a result of this recruitment must file a Conflict of Interest Statement within thirty (30) days of employment.

ABOUT INYO COUNTY

Inyo County is the ultimate destination for those who appreciate the outdoors. The County contains one of the most spectacular mountain ranges (Sierra Nevada) and one of the most spectacular desert areas (Death Valley) in the United States. It contains one National Park and borders two others. What it lacks in large

RECREATIONAL OPPORTUNITIES

- ◇ Downhill and Back Country Skiing at Mammoth/June Mountain resorts
- ◇ Cross Country Skiing
- ◇ Day-Hiking/Backpacking/Camping—Sierra Nevada & Great Basin
- ◇ Fishing and Hunting—Wild Trout Fishing, Deer, Fowl, etc.
- ◇ Four-Wheel Drive Exploration—Great Basin and Death Valley
- ◇ Horseback Riding—Clubs and Wilderness Trails
- ◇ Running, Biking, and Swimming
- ◇ Mountaineering, Rock Climbing
- ◇ Boating & Water Skiing

EDUCATIONAL/CULTURAL OPPORTUNITIES

- ◇ Cerro Coso Community College
- ◇ Geology of the Great Basin—Classes & Field Trips
- ◇ White Mountain Research Station, University of California
- ◇ Owens Valley Radio Observatory, Cal Tech
- ◇ Aboriginal Cultural History
- ◇ Inyo Council for the Arts
- ◇ Music Clubs, Cowboy Poetry Readings
- ◇ Eastern Calif. Museum, Independence
- ◇ Laws Railroad Museum

LOCAL EVENTS

- ◇ Mule Days
- ◇ Tri-County Fair
- ◇ 49er Encampment in Death Valley
- ◇ 4th of July in Independence
- ◇ Millpond Music Festival
- ◇ Lone Pine Film Festival

WEATHER-WATER-AIR

- ◇ Four Seasons Enjoyment
- ◇ Excellent Air Quality
- ◇ Abundant Streams, Lakes, & Hot Springs

ATTACHMENT B

**AGREEMENT BETWEEN COUNTY OF INYO
AND JERRY OSER
FOR THE PROVISION OF PERSONAL SERVICES
AS A COUNTY DEPARTMENT HEAD**

TERM:

FROM: January 7, 2021

TO: Termination

SCHEDULE OF FEES:

1. Department Head shall be paid \$8,918 per month, for the identified salary range for the Environmental Health Director, and shall be paid every two weeks on County paydays (26 pay periods per year). Department Head is starting at step C in the Environmental Health Director salary range and will move up the steps on anniversary date upon Board approval.
2. Except as otherwise provided in this contract, Department Head shall be compensated and receive benefits according to Inyo County Resolution Number 2006-06 or a successor resolution applicable to Department Heads.
3. Department Head is entitled to eighty (80) hours paid administrative hours off every fiscal year. The administrative leave hours shall not accumulate and will be lost if not utilized during the fiscal year. The administrative leave shall have no cash value.
4. County will provide and maintain a motor pool vehicle for Environmental Health Director use travelling between work locations and in conducting other County business. Said vehicle will be garaged overnight at a County facility unless prior permission is granted by the County Administrator or his designee.

ATTACHMENT C
AGREEMENT BETWEEN COUNTY OF INYO
AND JERRY OSER
FOR THE PROVISION OF PERSONAL SERVICES
AS A COUNTY DEPARTMENT HEAD

TERM:

FROM: January 7, 2021

TO: Termination

SCHEDULE OF TRAVEL AND PER DIEM PAYMENT:

1. Subject to Paragraph 2 below, County will reimburse Officer for travel and per diem expenses in the same amount and to the same extent as County reimburses its permanent status merit system employees.
2. Officer will not be reimbursed for intra-county travel by private automobile to destinations less than seventy-five (75) miles from Independence or Bishop, California.

\\ \\ NOTHING FOLLOWS \\ \\

**A RESOLUTION OF THE BOARD OF SUPERVISORS, COUNTY OF INYO,
STATE OF CALIFORNIA, AMENDING RESOLUTION 2006-06 CHANGING SALARY AND/OR
TERMS AND CONDITIONS OF EMPLOYMENT FOR APPOINTED OFFICIALS EMPLOYED IN
THE SEVERAL OFFICES OR INSTITUTIONS OF THE COUNTY OF INYO**

WHEREAS, the Board of Supervisors, pursuant to Government Code Section 25300, shall prescribe the compensation of all County Officers and shall provide for the number, compensation, tenure, appointment and conditions of employment of all County employees; and

WHEREAS, Appointed Officers are employees of the County of Inyo; and

WHEREAS, the Board of Supervisors desires to change the compensation, tenure, appointment and/or conditions of employment for Appointed County Officials;

NOW THEREFORE, BE IT RESOLVED that the Board of Supervisors hereby amends Article 7A of Resolution 2006-06 to read as follows:

ARTICLE 7. SALARIES

A. Salaries

Appointed Officials shall be paid a monthly salary as set forth in the schedule below:

Appointed Officers	July 9, 2020 thru January 6, 2021	January 7, 2021 and on
Ag Comm/Weights and Measures	\$12,557.00	\$12,557.00
County Administrator	\$15,606.00	\$15,606.00
County Counsel	\$16,059.00	\$16,059.00
Child Support Director	\$10,451.00	\$10,451.00
Environmental Health Director	\$ 9,111.00	\$ 8,918 .00
Water Director	\$ 9,812.00	\$ 9,812.00
Health and Human Services Director	\$11,142.00	\$11,142.00
Planning Director	\$ 9,111.00	\$ 9,111.00
Chief Probation Officer	\$10,805.00	\$10,805.00
Public Works Director	\$11,289.00	\$11,289.00

PASSED AND ADOPTED this 5th of January, 2021 following vote of the Inyo County Board of Supervisors:

- AYES:
- NOES:
- ABSTAIN:
- ABSENT:

Jeff Griffiths, Chairperson, Inyo County Board of Supervisors

Attest: Clint Quilter
Clerk of the Board

BY: _____
Darcy Ellis, Assistant



County of Inyo



County Counsel

TIMED ITEMS - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Ashley Helms

SUBJECT:

RECOMMENDED ACTION:

Request Board approve an ordinance titled, "An Ordinance of the Board of Supervisors, County of Inyo, State of California, Amending and Repealing Certain Sections of Title 11 of the Inyo County Code Related to Change Orders in Public Works Contracts."

SUMMARY/JUSTIFICATION:

On December 15, 2020, your Board waived further reading of the attached proposed ordinance and scheduled enactment for January 5, 2021 at 10:30 am. This ordinance is therefore coming to your Board for enactment today.

BACKGROUND/HISTORY OF BOARD ACTIONS:

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

Your Board could choose to not enact this ordinance. However, as set out in the December 15 staff report, this is not recommended, as the County Code sections that this ordinance is updating are quite outdated and need to be adjusted to reflect the current cost of most public works contracts.

OTHER AGENCY INVOLVEMENT:

FINANCING:

ATTACHMENTS:

1. Change Order Update Ordinance (1)

APPROVALS:

Grace Chuchla
Darcy Ellis

Created/Initiated - 12/30/2020
Approved - 12/30/2020

Grace Chuchla
Marshall Rudolph
Ashley Helms
Michael Errante

Approved - 12/30/2020
Approved - 12/30/2020
Approved - 12/31/2020
Final Approval - 12/31/2020

ORDINANCE NO. _____

**AN ORDINANCE OF THE BOARD OF SUPERVISORS
OF THE COUNTY OF INYO, STATE OF CALIFORNIA,
AMENDING AND REPEALING CERTAIN SECTIONS
OF TITLE 11 OF THE INYO COUNTY CODE RELATED
TO CHANGE ORDERS IN PUBLIC WORKS CONTRACTS**

The Board of Supervisors of Inyo County ordains as follows:

SECTION ONE. PURPOSE.

The purpose of this Ordinance is to update Sections 11.05.210 and 11.05.220 of the Inyo County Code to bring these sections in line with the California Public Contract Code.

SECTION TWO. AUTHORITY.

This Ordinance is enacted pursuant to the authority given the Inyo County Board of Supervisors by California Public Contract Code section 20142(a), which permits the Board of Supervisors to grant certain county officials the authority to order changes or additions to public works contracts.

SECTION THREE. MODIFICATIONS TO TITLE 11.

Section 11.05.210 of the Inyo County Code is hereby amended to read:

11.05.210 Contract change order authority granted to Public Works Director

Pursuant to Cal. Public Contract Code section 20142(a), the Director of Public Works, or his or her designee, is authorized to order changes or additions in the work being performed under public works contracts. The dollar value of changes or additions authorized by the Director of Public Works shall not exceed the monetary limits set forth in Public Contract Code section 20142, as it may be amended from time to time.

Changes or additions in excess of the monetary limits set forth in Public Contract Code section 20142 shall be presented to the Board of Supervisors for approval.

Section 11.05.220 of the Inyo County Code is hereby repealed in its entirety.

SECTION FOUR. SEVERABILITY.

If any section, subsection, sentence, clause, or phrase of this Ordinance is for any reason held to be invalid or unconstitutional by a decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this Ordinance. The Board hereby declares that it would have passed this Ordinance and each and every section, subsection, sentence, clause, or phrase not declared invalid or unconstitutional without regard to whether any portion of this Ordinance would be subsequently declared invalid or unconstitutional.

SECTION FIVE. CEQA COMPLIANCE.

This ordinance is not subject to the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15060(c)(2) (the activity will not result in a direct or reasonably foreseeable indirect physical change in the environment) and Section 15060(c)(3) (the activity is not a project as defined in Section 15378 of the CEQA Guidelines, because it has no potential for resulting in physical change to the environment, directly or indirectly.)

SECTION SIX. EFFECTIVE DATE.

This ordinance shall take effect and be in full force and effect thirty (30) days after its adoption. Before the expiration of fifteen (15) days from the adoption hereof, this ordinance shall be published as required by Government Code Section 25124. The Clerk of the Board is hereby instructed and ordered to so publish this ordinance together with the names of the Board members voting for or against the same.

PASSED AND ADOPTED this _____ day of January, 2021, by the following vote:

AYES: _____
NOES: _____
ABSTAIN: _____
ABSENT: _____

MATT KINGSLEY, Chairperson
Inyo County Board of Supervisors

ATTEST: Clint Quilter
Clerk of the Board

By: _____
Darcy Ellis, Assistant
Assistant Clerk of the Board



County of Inyo



Agricultural Commissioner

TIMED ITEMS - ACTION REQUIRED

MEETING: January 5, 2021

FROM: Nathan Reade

SUBJECT: Hearing on Appeal of Decision to Revoke Commercial Cannabis Business License 000142.

RECOMMENDED ACTION:

Request Board: A) conduct a hearing on the revocation for non-payment of commercial cannabis business license number 000142 issued to Old Spanish Cannabis and Commerce Park, LLC, as requested in an appeal by the licensee; and B) make a determination based on the hearing to revoke or not revoke license number 000142.

SUMMARY/JUSTIFICATION:

Commercial cannabis business licenses that are delinquent due to non-payment of renewal fees by July 1 of each year are subject to revocation pursuant to Inyo County Code subsection 5.40.140(A)(2). Renewal fees had not been received from the owners of license number 000142, issued to Old Spanish Cannabis and Commerce Park, LLC by the renewal deadline for the 2020/2021 licensing period.

A letter of revocation was delivered to the owner of Old Spanish Cannabis and Commerce Park, LLC. A response was received from the owner requesting a hearing to appeal the decision to revoke the license pursuant to Inyo County Code section 5.40.150. This hearing was requested to be in front of your board.

This item requests your board hold this hearing as requested and make a judgement on the decision to revoke commercial cannabis business license 000142.

BACKGROUND/HISTORY OF BOARD ACTIONS:

Commercial cannabis business licenses that are delinquent due to non-payment of renewal fees by July 1 of each year are subject to revocation pursuant to Inyo County Code subsection 5.40.140(A)(2). On May 4, 2020, the Inyo County Commercial Cannabis Permit Office (C3PO) issued a letter indicating fees were due for this license by July 1, 2020 with an included invoice. On June 9, 2020, a second letter was issued again explaining fees were due by July 1, 2020 with a second invoice attached.

Correspondence was then issued on August 13, 2020, stating the intent of the C3PO to revoke license 000142. This letter was sent via certified mail and was rejected by the contact listed in the licensee's file as the point of contact. The letter was finally accepted by the owner after later attempts at the owners address. A formal request for a hearing to appeal the decision of the C3PO was then received by Inyo County Administration on November 1, 2020.

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

Your board could choose to not hold this hearing, however, this would result in the status of this license being undetermined.

OTHER AGENCY INVOLVEMENT:

FINANCING:

This item does not have significant fiscal consequences.

ATTACHMENTS:

1. 2020 Renewal Letter OSCCP - Redacted
2. Inyo County Commercial Cannabis Permitting Office 7376 - Redacted
3. 2020 2nd Renewal Letter OSCCP
4. 8-13-2020 Revocation Letter OSCCP
5. REQUEST TO APPEAL

APPROVALS:

Nathan Reade	Created/Initiated - 12/10/2020
Darcy Ellis	Approved - 12/10/2020
Nathan Reade	Approved - 12/10/2020
Marshall Rudolph	Final Approval - 12/11/2020



COUNTY OF INYO

COMMERCIAL CANNABIS PERMITTING OFFICE

207 WEST SOUTH STREET
BISHOP, CA 93514
760.873.7860

5/4/2020

Cannabis business licensee,

The Inyo County Commercial Cannabis Business Permit Office is now accepting renewals for the July 1, 2020 to June 30, 2021 permit period. Pursuant to Inyo County code section 5.40.060(D), fees must be paid by June 30 or your permit will become invalid and subject to revocation.

Annual fees will continue to be \$8,850 during the 2020-2021 permit period. The attached invoice contains information on how and where to submit your fees. Please note that all fees must be paid to the Inyo County Treasurer's Office as indicated on the invoice.

According to our files, the following information pertains to your business:

Business Entity Information			
Business Name(D.B.A.) Old Spanish Cannabis and Commerce Park	Physical Address APN# 048-690-09	City Tecopa	
Mailing Address [REDACTED]	City [REDACTED]	State CA	Zip Code [REDACTED]
Primary Phone Number [REDACTED]	Secondary Phone Number [REDACTED]	Email Address [REDACTED]	
Community Liaison Kelly and Olivia Bradley			
License Type License Number 5G-001 – Cultivation >5,000ft² (A&M)			
Ownership Information			
Name Shannon Saccullo		Percent Ownership 100%	
Name		Percent Ownership	
Name		Percent Ownership	

If any of the above information is incorrect or has changed, you MUST fill out the attached Change Notification Form and return to our office.

Sincerely,

Nathan Reade
Director, Inyo County Commercial Cannabis Permit Office

Treasurer of Inyo County
PO Drawer O
Independence, CA 93526

Invoice

Date	Invoice #
6/1/2020	21

Bill To

Old Spanish Cannabis & Commerce Park
Kelly & Olivia Bradley



Make Check Payable To:
Treasurer of Inyo County
Do Not Make Any Reference to
"Cannabis"
on Method of Payment

Remit Payment To:
Treasurer of Inyo County
PO Drawer O, Independence CA
93526

Due Date
6/30/2020

Description	Amount
License Renewal 5G-001 Cultivation >5000sq ft 2020-2021	8,850.00

If you have any questions regarding your payment please call the Treasurer of Inyo County:
(760) 878-0312

Total	\$8,850.00
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COUNTY OF INYO

COMMERCIAL CANNABIS PERMITTING OFFICE

207 WEST SOUTH STREET
BISHOP, CA 93514
760.873.7860

6/9/2020

Cannabis business licensee,

The Inyo County Commercial Cannabis Business Permit Office is now accepting renewals for the July 1, 2020 to June 30, 2021 permit period. Pursuant to Inyo County code section 5.40.060(D), fees must be paid by June 30 or your permit will become invalid and subject to revocation.

Annual fees will continue to be \$8,850 during the 2020-2021 permit period. The attached invoice contains information on how and where to submit your fees. Please note that all fees must be paid to the Inyo County Treasurer's Office as indicated on the invoice.

According to our files, the following information pertains to your business:

Business Entity Information			
Business Name(D.B.A.) Old Spanish Cannabis and Commerce Park	Physical Address APN# 048-690-09	City Tecopa	
Mailing Address 28241 Crown Valley Parkway	City Laguna Niguel	State CA	Zip Code 92677
Primary Phone Number 949.542.0688	Secondary Phone Number 949.214.5390	Email Address shannongreen911@aol.com	
Community Liaison Kelly and Olivia Bradley			
License Type License Number 5G-001 – Cultivation >5,000ft² (A&M)			
Ownership Information			
Name Shannon Saccullo			Percent Ownership 100%
Name			Percent Ownership
Name			Percent Ownership

If any of the above information is incorrect or has changed, you MUST fill out a Change Notification Form and return to our office.

Sincerely,

Nathan Reade
Director, Inyo County Commercial Cannabis Permit Office



COUNTY OF INYO

COMMERCIAL CANNABIS PERMITTING OFFICE

207 WEST SOUTH STREET
BISHOP, CA 93514
760.873.7860

8/13/2020

Shannon Saccullo,

The Inyo County Commercial Cannabis Business Permit Office sent two letters with accompanying invoices to you requesting payment for the 2020/2021 commercial cannabis permitting period. Those letters are attached hereto for your reference. Our office is informed that you did not submit payment to the Inyo County Treasurers Office by July 1, 2020, as required by Inyo County Code sections 5.40.060(A), 5.40.090(K), and 5.40.100. Because of this your permit is subject to revocation pursuant to Inyo County Code section 5.40.140(A)(3).

Due to your failure to comply with Inyo County Code sections 5.40.060(A), 5.40.090(K), and 5.40.100 the following license number(s) you are hereby revoked:

Old Spanish Cannabis & Commerce Park: 5G-001

This revocation shall become final 10 business days after the date of this notice unless you seek an appeal pursuant to Inyo County Code Section 5.40.150. If you would like to request a hearing you must do so within 10 business days of the date of this notice. Pursuant to Inyo County Code section 5.40.150(B), the request shall be made to:

Mr. Clint Quilter, Inyo County Administrative Officer
PO Drawer N
Independence, CA 93526

With a copy by email to:
C3PO@inyocounty.us

Please do not hesitate to contact me with any questions regarding this notice.

Sincerely,

Nathan Reade
Director, Inyo County Commercial Cannabis Permit Office

From: [C3PO](#)
To: [Nathan Reade](#)
Subject: FW: REQUEST TO APPEAL AND HEARING FOR LICENSE REVOCATION
Date: Thursday, December 10, 2020 2:32:36 PM

From: David Saccullo [REDACTED]
Sent: Sunday, November 01, 2020 7:16 PM
To: Darcy Ellis; C3PO; Clint Quilter; Matt Kingsley
Subject: REQUEST TO APPEAL AND HEARING FOR LICENSE REVOCATION

CAUTION: This email originated from outside of the Inyo County Network. DO NOT click links or open attachments unless you recognize and trust the sender. Contact Information Services with questions or concerns.

11-1-2020

Good day to all,

Hope these most difficult times find everyone and their families well. We are respectfully requesting to seek an appeal pursuant to Inyo County Code section 5.40.150. Aswell a hearing pursuant to Inyo county Code section 5.40.150 (B) Our projects have been in the making now for over 3 1/2 years. We have now spent over \$4 plus Million Dollars on everything ranging from CEQA, Architectural documents, Civil and structural engineering, Solar field experts analysis Ect Ect. We have been very privileged to have worked with the County council, planning department and Agriculture dept from the start of the cannabis Ordinance being implemented. As any professional knows in the land development sphere, any project this size, 2.1 million Sq/Ft in the Desert can take many Years to procure all necessary approvals, reports and most importantly, Funding. Our project , "OLD SPANISH CANNABIS AND COMMERCE PARK" alone is going to be \$800 Plus million Dollars including the 50 Megawatt Solar and Micro Grid. Our project when complete and fully operational will be the driving force of Tens of millions of dollars of tax revenue enabling the county to make critical investments into the community where they see fit. We plan also as a company to donate a portion of our profits to also making significant positive changes in our community. Although we have been working on our Funding for 2 plus years now, the unfortunate Covid 19 pandemic has made the past 10 months very challenging for us to get our closing across the finish line. We are currently engaged with a few very solid options of achieving our funding Goals and would like to invite a detailed conversation with all entities involved with our projects request. At this point, the reality of a project this size will require another 18 to 24 months, Give or take, to complete all CEQA, Working drawings, CUP process and Cannabis State Licensing. We are 100% committed both financially, technologically and vertically to create the most Spectacular state of the art Cannabis Cultivation and manufacturing Facility on the planet! We with great respect ask that Inyo County give us the realistic time frame needed to complete our Vision. Thank you in advance for everyone's time and efforts in working with our staff of Professionals and making the dream a reality. Please feel free to contact Shannon and myself directly with any and all questions, Cell # [REDACTED] or contact this email.

Respectfully Submitted
Shannon and David Saccullo