

Attachment 2 to for Supplemental Staff Report for B2H DPO Hearing:

Comments on DPO received by May 24, 2024 at 12:00 pm

Table 1: Comments Received on B2H RFA2 DPO as of May 24, 2024

Commenter	Agency/Public	Date	Comments
Sue McCarthy	Public	04-26-2024	Department response saved with comment
Amanda Baker	Public	04-26 and 04-29-2024	Department response saved with comment, multiple comments combined into one PDF
Irene Gilbert	Public	04-26-2024 to 05-08-2024	Multiple comments combined into one PDF
Morrow County Board of Commissioners	Special Advisory Group	05-17-2024	Department and County response saved with comment in one PDF
John Milbert	Public	05-24-2024	-

TARDAEWETHER Kellen * ODOE

From: TARDAEWETHER Kellen * ODOE
Sent: Friday, April 26, 2024 8:51 AM
To: Sue McCarthy
Subject: RE: Boardman to Hemingway Transmission Line
Attachments: Extracted pages from FIG 4-1 Proposed Micrositing Area Additions.pdf

Good morning Sue,

Thank you for the email comment on the B2H RFA2 Draft Proposed Order. Part of RFA2 is Idaho Power's request to expand the site boundary as well as add new micrositing areas. The expanded site boundary is an area that is evaluated for resources, however, the proposed micrositing areas are the areas where actual facility components would be located, if Council approves the changes. So, no facility components would be located in the expanded site boundary area (yellow line on the Figure 4-1 and 8-1 maps). That said, you correctly point out that in Figure 8-1 the expanded site boundary is shown crossing Morgan Lake Park. This is a mapping error in Figure 8-1. I've attached the map from Figure 4-1 in the same area, showing that the expanded site boundary borders and does not enter Morgan Lake Park. Again, the expanded site boundary is not where RFA2 facility components would be located and the findings stated in the Final Order on the application for site certificate (ASC), indicate that there would not be any facility components (towers, roads, etc.) located within the Park boundaries either. Thank you so much for the comment and I hope this helps. I will save your comment and my response on the record for the DPO and pass it along to Idaho Power.

Kellen

Kellen Tardaewether
Senior Siting Analyst
550 Capitol St. NE Salem, OR 97301
C: 503-586-6551
P (In Oregon): 800-221-8035

-----Original Message-----

From: Sue McCarthy <suemc@eoni.com>
Sent: Thursday, April 25, 2024 6:31 PM
To: TARDAEWETHER Kellen * ODOE <kellen.tardaewether@energy.oregon.gov>
Subject: Boardman to Hemingway Transmission Line

[You don't often get email from suemc@eoni.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol Street NE, 1st Floor

Salem, Oregon 97301

I received in the mail the new information on the H2B transmission line.

I would like to make a comment on the RFA2 proposed site boundary.

The proposed site boundary shown in figure 8, map 29 of Union County includes part of Morgan Lake Park, including all of Twin lake and part of Morgan Lake itself. Both these are important for wildlife habitat and public recreation.

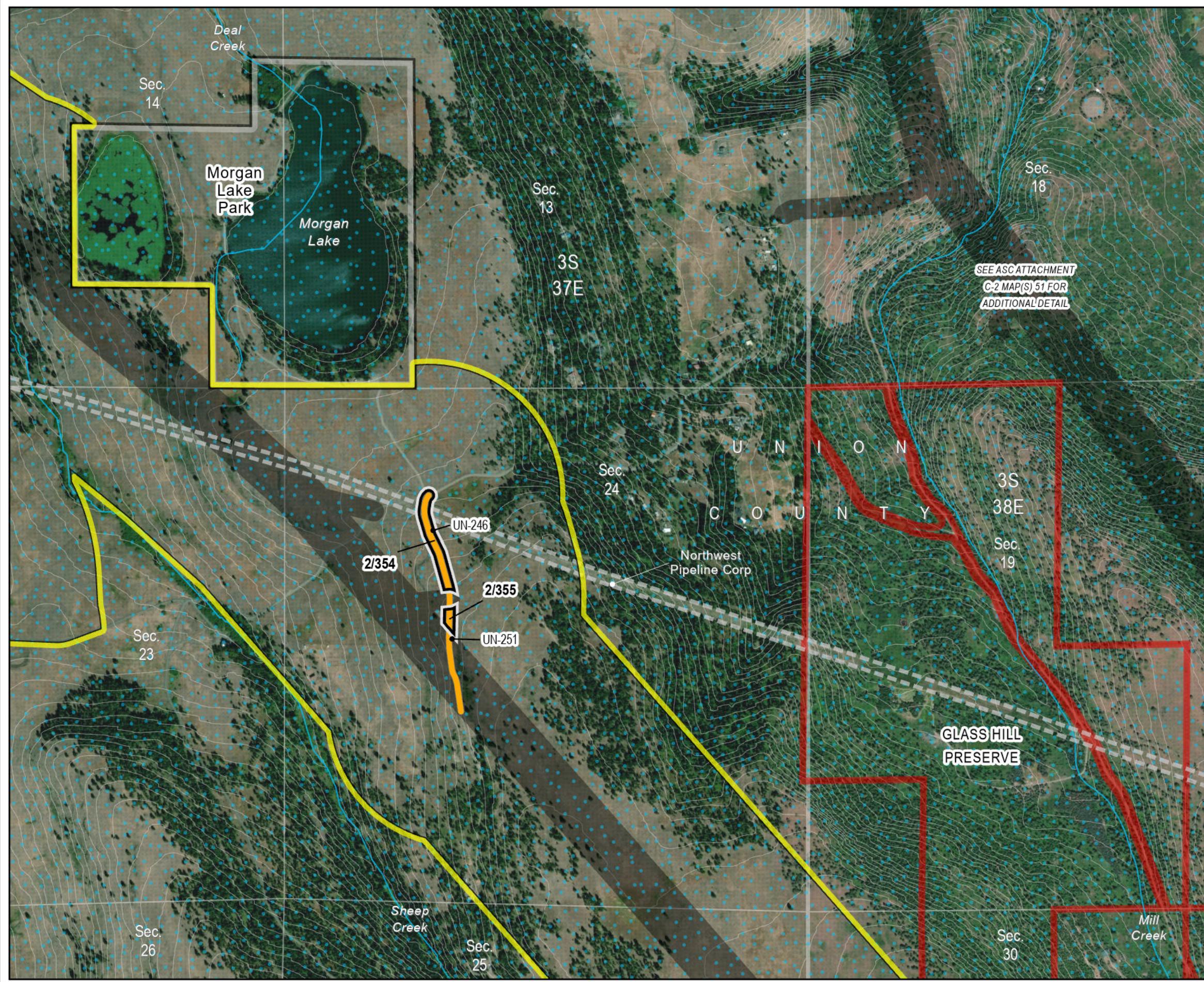
The movement of the boundary just a small distance would help remove this issue.

Thanks,

Sue McCarthy

suemc@eoni.com

cell 541 786 0824



Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing
Area Additions
Union County

TARDAEWETHER Kellen * ODOE

From: Sue McCarthy <suemc@eoni.com>
Sent: Friday, April 26, 2024 8:55 PM
To: TARDAEWETHER Kellen * ODOE
Subject: H2B

You don't often get email from suemc@eoni.com. [Learn why this is important](#)

Oregon Department of Energy,

I would like to make another comment/concern on the H2B transmission line that will pass by Morgan Lake Park. There is a Bald Eagle nest at the coordinates

118.14560 (Lat.) by 45.30164 (Long.). I believe this is very close to the transmission line and would be detrimental to the breeding eagles.

Thanks,
sue mccarthy
suemc@eoni.com
cell 541 786 0824

TARDAEWETHER Kellen * ODOE

From: TARDAEWETHER Kellen * ODOE
Sent: Monday, April 29, 2024 8:31 AM
To: Amanda Baker
Subject: RE: B2H hwy 86 Baker

If it's the yellow line on the maps that you're talking about, that is an expanded site boundary which is an area that is evaluated for resources, but not where facility components would be located. As I mentioned, the transmission line route in this area is staying the same as it was previously approved except for a minor adjustment to the rebuilding of the existing 230 kV line. Hope this helps,

Kellen



Kellen Tardaewether
Senior Siting Analyst
550 Capitol St. NE Salem, OR
97301
C: 503-586-6551
P (In Oregon): 800-221-8035



Stay connected!

From: Amanda Baker <heavenboundalc@gmail.com>
Sent: Friday, April 26, 2024 8:53 PM
To: TARDAEWETHER Kellen * ODOE <kellen.tardaewether@energy.oregon.gov>
Subject: Re: B2H hwy 86 Baker

You don't often get email from heavenboundalc@gmail.com. [Learn why this is important](#)

So it's literally going through my entire property?

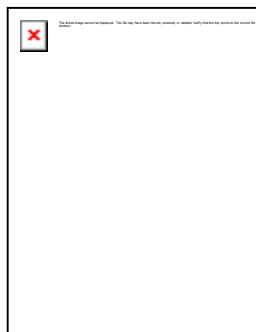
On Fri, Apr 26, 2024, 9:11 AM TARDAEWETHER Kellen * ODOE
<kellen.tardaewether@energy.oregon.gov> wrote:

Good morning Amanda,

I'm attached a couple maps from RFA2 which show the land parcels under your name as well as the proposed changes within the vicinity of your property. It appears that the changes proposed in RFA2 within the vicinity of your property include slightly modified temporary pulling and tensioning sites and a minor adjustment (moving further away) of the previously approved 230 kV rebuild in the area. As part of RFA2, Idaho Power requests to expand the site boundary as well as add new micrositing areas. The expanded site boundary is an area that is evaluated for resources, however, the proposed micrositing areas are the areas where actual

facility components would be located or temporary would be conducted, if Council approves the changes. So, no facility components would be located in the expanded site boundary area (yellow line on the Figure 4-1). Mailed notices were sent to property owners within 500 feet of the site boundary, so that is why you received the notice. But the primary previously approved location of the transmission line is not changing. Let me know if this helps and you have any additional questions. I will save your comment and my response on the record for the DPO and pass it along to Idaho Power.

Kellen



Kellen Tardaeether
Senior Siting Analyst
550 Capitol St. NE Salem, OR
97301

C: 503-586-6551
P (In Oregon): 800-221-8035



From: Amanda Baker <heavenboundalc@gmail.com>
Sent: Thursday, April 25, 2024 7:05 PM
To: TARDAEWETHER Kellen * ODOE <kellen.tardaeether@energy.oregon.gov>
Subject: B2H hwy 86 Baker

You don't often get email from heavenboundalc@gmail.com. [Learn why this is important](#)

I was told last year there wouldn't be transformers on or near my property, now I'm being notified it's going to be on or within 500' of my ranch!

Your map DOES NOT include the portion going through HWY 86, Baker City, which I've been told lines are going through there & that's where my ranch is.

I need a detailed/ zoomed in map of that area so I can see where the lines will actually be.

Thank you

Amanda Baker

TARDAEWETHER Kellen * ODOE

From: Irene Gilbert <ott.irene@frontier.com>
Sent: Friday, April 26, 2024 10:59 AM
To: TARDAEWETHER Kellen * ODOE
Subject: Comment regarding DPO for Boardman to Hemingway Transmission line Amendment 2
Attachments: Comment Regarding Party Status Limits.docx

Please include the attached written comment in your file for the above DPO.

To: Kellen Tardaewether

Date: April 26, 2024

From: Irene Gilbert/2310 Adams Ave/La Grande, Oregon

Subject: Comment One submitted by Irene Gilbert on behalf of the public interest and herself as a petitioner regarding the Draft Proposed Order for the Boardman to Hemingway Transmission Line, Amendment 2

ISSUE STATEMENT:

The Draft Proposed Order cannot designate all petitioners as Limited Parties other than the Applicant absent an evaluation of their requests for party status.

Limiting all parties participation in the contested case procedure to only the issues they raised in their Comments on the DPO denies parties the opportunity to fully participate in the proceedings in the manner described in ORS 183 for full parties.

Pages 42 and 43 of DPO on Request for Amendment 2 states:

“The issues a party to a contested case proceeding may participate on must be limited to those issues that party properly raised in its contested case request that the Council found sufficient to justify a contested case, except that the certificate holder may participate on any issue the Council found sufficient to justify a contested case proceeding.”

The Draft Proposed Order limits all petitioners to Limited Party Status in Contested Case Proceedings absent conducting an evaluation regarding whether or not they should be granted full party status.

This language is not consistent with OAR 137-003-0005(7) requirements that establish criteria which must be evaluated in determining a parties application to be a full party.

It is also not consistent with the Oregon Supreme Court ruling in Stop B2H Coalition v. Dept of Energy, Pages 803-804. The court concluded that “EFSC (l) had authority to grant limited party status to Stop B2H and (2) **considered the factors it was required to consider in making that determination.**”

The Oregon Supreme Court did not rule that EFSC has the authority to limit all petitioners to Limited Party Status in contested case proceedings with the exception of the developer absent evaluating and describing the justification for the limitation.

This comment is related to a procedural limitation denying the public full access to the Contested Case Procedure for this development. I expect that the council will deny this request given the strict requirements that it fall only within Chapter 22, 23 and 24 requirements to qualify for a contested case hearing. There is no rule in these chapters which covers this comment, however, I am submitting it to obtain documentation that the request is “other than a contested case” in order to establish my appeal rights on this issue.

TARDAEWETHER Kellen * ODOE

From: Irene Gilbert <ott.irene@frontier.com>
Sent: Wednesday, May 8, 2024 8:42 PM
To: TARDAEWETHER Kellen * ODOE; TARDAEWETHER Kellen * ODOE
Subject: Comment regarding the Draft Proposed Order for Amendment 2 of the B2H site certificate
Attachments: Comment referrals to comments by others.docx

Kellen:

Please see that the attached comment regarding the above Draft Proposed Order is included in the agency listing of comments submitted and provided to the council prior to considering the Draft Proposed Order

Thans very much.

Irene

To: Kellen Tardaewether

Date: 5/8/24

Subject: Illegal restrictions and interpretation of items allowed as comments and evidence regarding the Draft Proposed Order for B2H Amendment 2.

Kellen:

This comment is being provided early to assure that it is included in the record of comments provided to the public and the council prior to their review of comments on the DPO for Amendment 2

COMMENT

The Oregon Department of Energy and Energy Facility Siting Council are requiring parties requesting full party status to be designated as limited parties when more than one contested case is being heard. They are further denying limited parties the opportunity to respond to comments by other petitioners who have contested cases being heard. As a result, petitioners are required to submit comments on all issues which they do not agree with or wish to request a contested case on.

They have now interpreting Oregon Statutes and rules in a manner that is denying the public the submission of and use of comments by other commenters and references to comments of other petitioners. They are also refusing to accept results and documents provided in other agency actions relating to issues petitioners have, etc. The language and interpretation which is the subject of this comment are in the Draft Proposed Order and footnotes on pages 39 and 40 of that order which specifically states the intended restrictions regarding the evidence being accepted in the public comments supporting requests for contested cases in quasi-judicial hearings before the Energy Facility Siting Council. The language in the Draft Proposed Order states the following:

“ OAR 345-015-0016(3). Council does not consider incorporation by reference statements or comments made by other persons, (whether they are comments on the DPO, raised by other commenters for this facility or past proceedings, comments on another agency proceeding, or other external references) to meet the sufficient specificity requirement under ORS 469.370(3) and OAR 345-015-0016(3). Blanket incorporations by reference do

¹ Illegal interpretation of supporting evidence and the use of comments by more than one petitioner

not afford the Department, Council or certificate holder an adequate opportunity to respond to each issue as required under ORS 469.370(3) because they typically do not specify which portion(s) of the other person(s) comments are to be incorporated or how those comments relate to any alleged shortcoming in the subject DPO. Attempts to incorporate by reference comments made regarding a matter being considered by another agency do not inform the Council, Department or applicant/certificate holder of any alleged error in the subject DPO sufficient to allow for a response. Further, incorporations by reference of another person's comments on the subject DPO, no matter how specific, are procedurally inefficient because they could result in multiple persons presenting evidence, examining witnesses, etc. regarding the same issue in a contested case. Council has also maintained that this position is consistent with the reasons why it is appropriate to limit the participation of persons seeking to participate in a contested case to the issues each properly raised in their respective DPO comments" (Page 39 and 40 of DPO for Amendment 2)

1. There are multiple laws being broken by their actions, however, two Statutes and one Rules being illegally interpreted follows:

Quai-Judicial Procedures Ch. 17

17.24.200 Evidence.

(1) All evidence offered and not objected to may be received unless excluded by the approval authority on its own motion.

(2) Evidence received at any hearing shall be of a quality that reasonable persons rely upon in the conducting of their everyday affairs.

(3) No person shall present irrelevant, immaterial, or unduly repetitious testimony or evidence.

(4) Formal rules of evidence, as used in courts of law, shall not apply. (Ord. 2875 § 1.070.200, 2003)(9)

ORS 197.797.(9)(b)

“Evidence” means facts, documents, data or other information offered to demonstrate compliance or noncompliance with the standards believed by the proponent to be relevant to the decision. [Formerly 197.763]”

ORS 183.450(1) Evidence in contested cases.

:

“(1) Irrelevant, immaterial or unduly repetitious evidence shall be excluded but erroneous rulings on evidence shall not preclude agency action on the record unless shown to have substantially prejudiced the rights of a party. All other evidence of a type commonly relied upon by reasonably prudent persons in conduct of their serious affairs shall be admissible. Agencies and hearing officers shall give effect to the rules of privilege recognized by law. Objections to evidentiary offers may be made and shall be noted in the record. Any part of the evidence may be received in written form.

(2) All evidence shall be offered and made a part of the record in the case, and except for matters stipulated to and except as provided in subsection (4) of this section no other factual information or evidence shall be considered in the determination of the case. Documentary evidence may be received in the form of copies or excerpts, or by incorporation by reference. The burden of presenting evidence to support a fact or position in a contested case rests on the proponent of the fact or position.”

THE REFERENCES STATED BY ODOE WHICH THEY STATE ALLOW THEM TO INTERPRET THE LAW REGARDING THEIR INTERPRETATION OF ACCEPTABLE EVIDENCE SUPPORTING A PERSON’S COMMENTS AND CONTESTED CASE REQUESTS DO NOT PROVIDE THEM THE AUTHORITY TO TAKE THE ACTIONS DESCRIBED IN THE DRAFTY PROPOSED ORDER. REFERENCES ARE AS FOLLOWS:

OAR 345-015-0016(3) “Except as described in section (4) of this rule, only those persons who have commented in person or in writing on the record of the public hearing described in [OAR 345-015-0220 \(Public Hearing on the Draft Proposed Order\)](#) may request to participate as a party or limited party in a contested case proceeding on an application for a site certificate. To raise an issue in a contested case proceeding, the issue must be within the jurisdiction of the Council, and the person must have raised the issue in person or in writing on the record of the public hearing, unless the

3 Illegal interpretation of supporting evidence and the use of comments by more than one petitioner

Department did not follow the requirements of [ORS 469.370 \(Draft proposed order for hearing\)](#)(2) or (3) or unless the action recommended in the proposed order described in OAR 345-015-230, including any recommended conditions of approval, differs materially from the action recommended in the draft proposed order, in which case the person may raise only new issues within the jurisdiction of the Council that are related to such differences. If a person has not raised an issue at the public hearing with sufficient specificity to afford the decision maker an opportunity to respond to the issue, the hearing officer may not consider the issue in the contested case proceeding. **To have raised an issue with sufficient specificity, the person must have presented facts at the public hearing that support the person's position on the issue.**

And

ORS 469.370(2)(e) and ORS 469.370(3)

“ORS270(2)(e)

“State that failure to raise an issue in person or in writing prior to the close of the record of the public hearing with sufficient specificity to afford the decision maker an opportunity to respond to the issue precludes consideration of the issue in a contested case.”

ORS 270(3)

“Any issue that may be the basis for a contested case shall be raised not later than the close of the record at or following the final public hearing prior to issuance of the department's proposed order. Such issues shall be raised with sufficient specificity to afford the council, the department and the applicant an adequate opportunity to respond to each issue. A statement of this requirement shall be made at the commencement of any public hearing on the application.”

THE ABOVE RULES AND STATUTE DO NOT PROVIDE ODOE OR EFSC THE AUTHORITY TO REINTERPRET THE LAW:

SUMMARY

1. Public parties do not have the resources to research hundreds and often thousands of pages of documents in the average 30 days provided to review and comment on the application and draft proposed order in order to establish the right to a contested case. It is impossible for most members of the public to do the necessary review given the fact that they often have full time jobs and other responsibilities.
2. By their recent decision to only allow ODOE and the developers to be full parties to contested cases when there is more than one petitioner, they are requiring all petitioners to include comments on every issue they want to object to or present testimony on during a contested case proceeding.
3. They are now attempting to interpret the law regarding what is acceptable as proof, evidence or support for comments in a manner that denies the public the use of material and references acceptable according to Oregon Statutes and Rules.
4. ODOE and EFSC do not have the authority to reinterpret rules and statutes which provide the public access to due process under Oregon law and the US Constitution.

CHANGE NEEDED TO COMPLY WITH OREGON LAW REGARDING EVIDENCE:

Remove the discussion regarding petitioners not being able to submit and reference comments by other petitioners and acceptable documentation regarding issues. The proposed order needs to state that evidence allowed by ORS 183.450 and the Model Rules is acceptable to support an issue which is the subject of public comment and contested case requests.

Comment Submitted by:

Irene Gilbert on behalf of the public interest and herself as a petitioner

2310 Adams Ave.

La Grande, Oregon 97850

Email: ott.irene@frontier.com

TARDAEWETHER Kellen * ODOE

From: Tamra Mabbott <tmabbott@co.morrow.or.us>
Sent: Tuesday, May 21, 2024 8:45 AM
To: TARDAEWETHER Kellen * ODOE
Cc: Daisy Goebel; Eric Imes; Corey Sweeney; ESTERSON Sarah * ODOE
Subject: Re: B2H Signed Letter

Kellen - thank you for your follow up. I believe the letter has a Scrivner's error. I'm not sure how the "1.2 miles wide" was added.

It would not be timely to send a follow up but please note for the record.

Thank you. Tamra

From: TARDAEWETHER Kellen * ODOE <Kellen.TARDAEWETHER@energy.oregon.gov>
Sent: Monday, May 20, 2024 8:35 AM
To: Tamra Mabbott <tmabbott@co.morrow.or.us>
Cc: Daisy Goebel <dgoebel@co.morrow.or.us>; Eric Imes <eimes@co.morrow.or.us>; Corey Sweeney <mcweed@co.morrow.or.us>; ESTERSON Sarah * ODOE <Sarah.ESTERSON@energy.oregon.gov>
Subject: RE: B2H Signed Letter

[EXTERNAL EMAIL] - STOP and VERIFY - This message came from outside of Morrow County Gov

Good morning Tamra,

Thank you for the DPO comment letter. I'll save it to the record and pass it along to IPC and EFSC.

Please note:

- The expanded site boundary is .5 miles wide (.25 miles on both sides from the center line of transmission routes and roads), not 1.2 miles wide.
- If approved, the expanded site boundary area would not be an approval to locate facility components (routes, roads, work areas) within that area. If approved, IPC would only be able to locate facility components within the micrositing areas.
- The expanded site boundary is a wider area that is evaluated for resources under Council standards and would enable a streamlined review of future micrositing adjustments under the Amendment Determination Request (ADR) pathway designated under OAR 345-027-0357.
- The widths of the micrositing areas are:
 - For the 500-kV transmission line and communication stations, a 500-foot-wide area.
 - For Longhorn Station, approximately 190 acres.
 - For access roads, 100 or 200-feet in width, depending on the nature of the road.
 - For temporary work areas (MUAs, pulling and tensioning sites, and light duty fly yards), from 4 to 23 acres.
- Within those micrositing areas, the actual final operational ROW width is smaller, as follows:
 - Single-circuit 500-kV transmission line – 250 feet. In forest lands – 300 feet
 - Along the east edge of Naval Weapons Systems Training Facility (NWSTF) Boardman – 90 feet
 - Roads – Approximately 14 feet (note that the widths for construction roads is wider and part of the RFA2 request.

Let me know if you have any questions or additional comments and talk soon!

Kellen



Kellen Tardaewether
Senior Siting Analyst
550 Capitol St. NE Salem, OR
97301
C: 503-586-6551
P (In Oregon): 800-221-8035



Stay connected!

From: Tamra Mabbott <tmabbott@co.morrow.or.us>
Sent: Friday, May 17, 2024 4:22 PM
To: TARDAEWETHER Kellen * ODOE <Kellen.TARDAEWETHER@energy.oregon.gov>
Cc: Daisy Goebel <dgoebel@co.morrow.or.us>; Eric Imes <eimes@co.morrow.or.us>; Corey Sweeney <mcweed@co.morrow.or.us>
Subject: Fw: B2H Signed Letter

Kellen - attached is the letter from Morrow County RE the B2H RFA2.

Thank you.

Tamra

From: Valerie Ballard <vballard@co.morrow.or.us>
Sent: Thursday, May 16, 2024 3:03 PM
To: Tamra Mabbott <tmabbott@co.morrow.or.us>
Subject: B2H Signed Letter

Hi Tamra,

Here is the letter to ODOE for B2H.

And thank you for the note about my sandals 😊

Valerie Ballard
Executive Assistant
Morrow County Administration and Board of Commissioners
541-676-5613 ext. 5303
PO Box 788
110 N Court St.
Heppner, OR 97836
vballard@co.morrow.or.us



BOARD OF COMMISSIONERS

110 N Court St. • P.O. Box 788
Heppner, OR 97836
541-676-5613
www.co.morrow.or.us

David Sykes, Chair
Jeff Wenzel, Commissioner
Roy Drago Jr., Commissioner

May 15, 2024

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301

RE: Boardman to Hemingway Transmission Line – Preliminary Request for Amendment 2

Dear Ms. Tardaewether:

Thank you for the opportunity to provide comments. The purpose of this letter is to address the Request for Amendment (RFA2) for the Boardman to Hemingway Transmission Line Project (B2H). It is our understanding that the request includes an amendment to the site boundary and micrositing area to accommodate:

1. Eleven transmission line alternative locations impacting several parcels in Morrow County.
2. Refinement of the location of temporary work areas and roads.
3. Expansion of the Site Boundary and increasing the micro-siting corridor from 200 feet to 1.2 miles.

Additions proposed within Morrow County are identified in the table below, provided in the applicant's request:

Table 2: RFA2 Proposed Transmission Line Route, Access Road, and Work Area Additions

Proposed Micrositing Area Additions ¹	Length of Addition – Transmission Line (miles)	Length of Addition – Access Road (miles)	Work Areas (acres)	Micrositing Area (acres)	Description of Micrositing Area Addition
Morrow County					
Boardman Junction alternative ²	0.6	--	3.9	5.1	Slight design modification to west to span I-84
Bombing Range SE alternative ³	1.0	0.4	0.8	5.7	Slight design modification to east to avoid impacts to pivot irrigation
West of Bombing Range Road Alternative 1 (ASC Approved Alternative)	--	--	1.8	--	Pulling-tensioning site adjustments
Ayers Canyon alternative ⁴	8.7	24.2	63.6	893.9	Alignment shifted to southeast per landowner request
Other Access Road and Work Area Changes for ASC Approved Route	--	1.7	34.6	19.8	Road and pulling-tensioning site adjustments
Morrow County – Total	10.3	25.4	75.4	924.5	

Morrow County has reviewed the applicant's submitted materials to the extent practical given the limited comment period. Morrow County wishes to highlight the substantial increase in acreage included in the Site Boundary. Staff could not find the calculated "Site Boundary" acreage increase specifically identified in the application materials, but in most locations the width of the site boundary will be widened from the approved 1-200 feet to 1.2 miles. It is not clear to what extent affected landowners were consulted and/or compensated for the additional impacts to private property. Additionally, we request that the certificate holder obtain a Road Use Agreement from Eric Imes, Morrow County Public Works Director for B2H construction. Prior Comments related to B2H and RFA1 are still applicable.

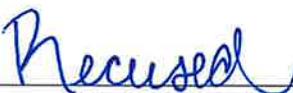
As always, Morrow County appreciates the opportunity to coordinate with you and other Department staff. Should you have any questions about this comment letter, or need additional information, please do not hesitate to contact Tamra Mabbott, Planning Director, (541) 922-4624.

Sincerely,

MORROW COUNTY BOARD OF COMMISSIONERS



David Sykes, Chair



Jeff Wenholz, Commissioner



Roy Drago Jr., Commissioner

Enclosures:

Encl. 1—Applicable IPC Site Boundary Change Maps

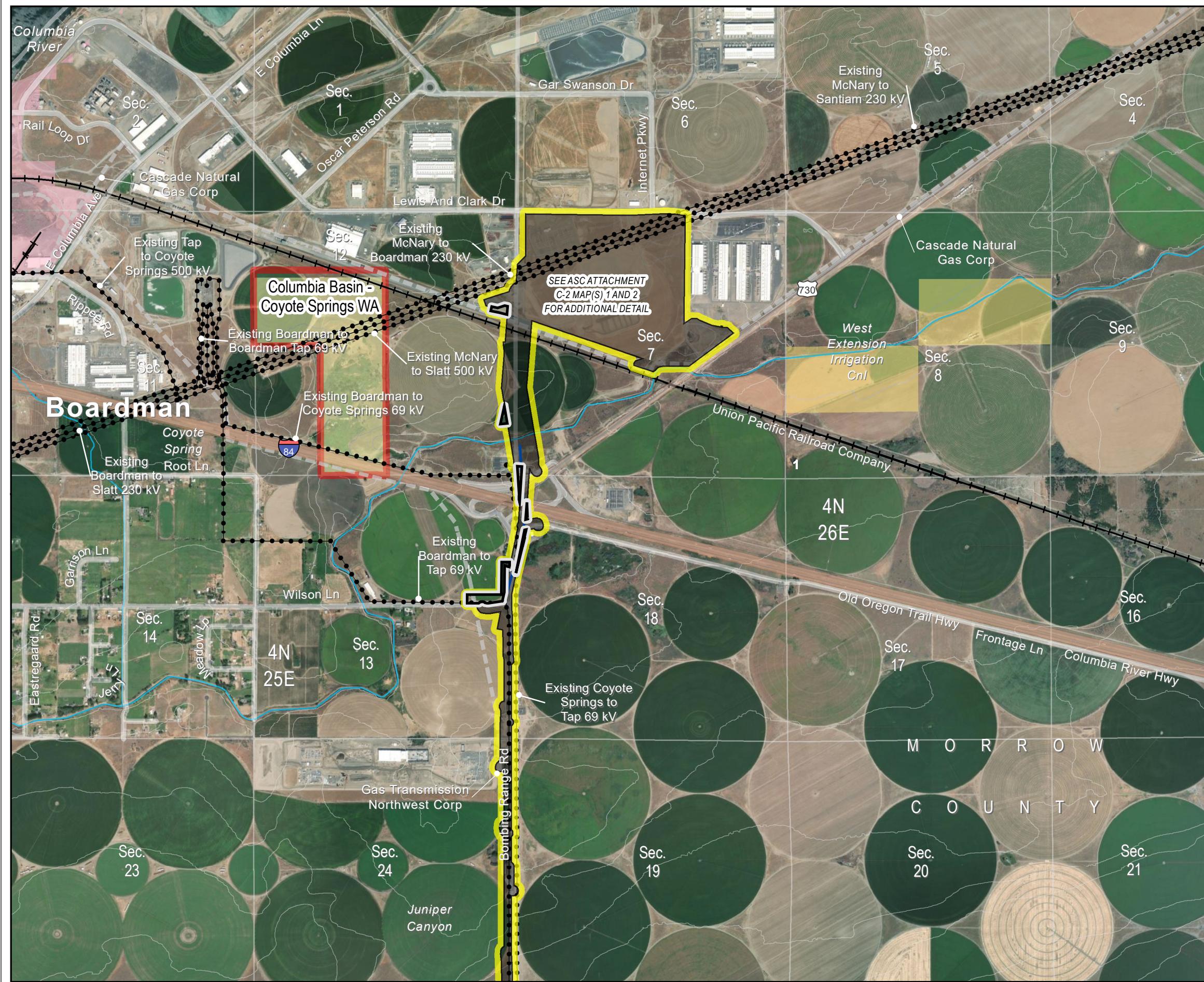
Encl. 2—Applicable IPC Proposed Micrositing Area Additions Maps

cc: Eric Imes, Morrow County Public Works Director

Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

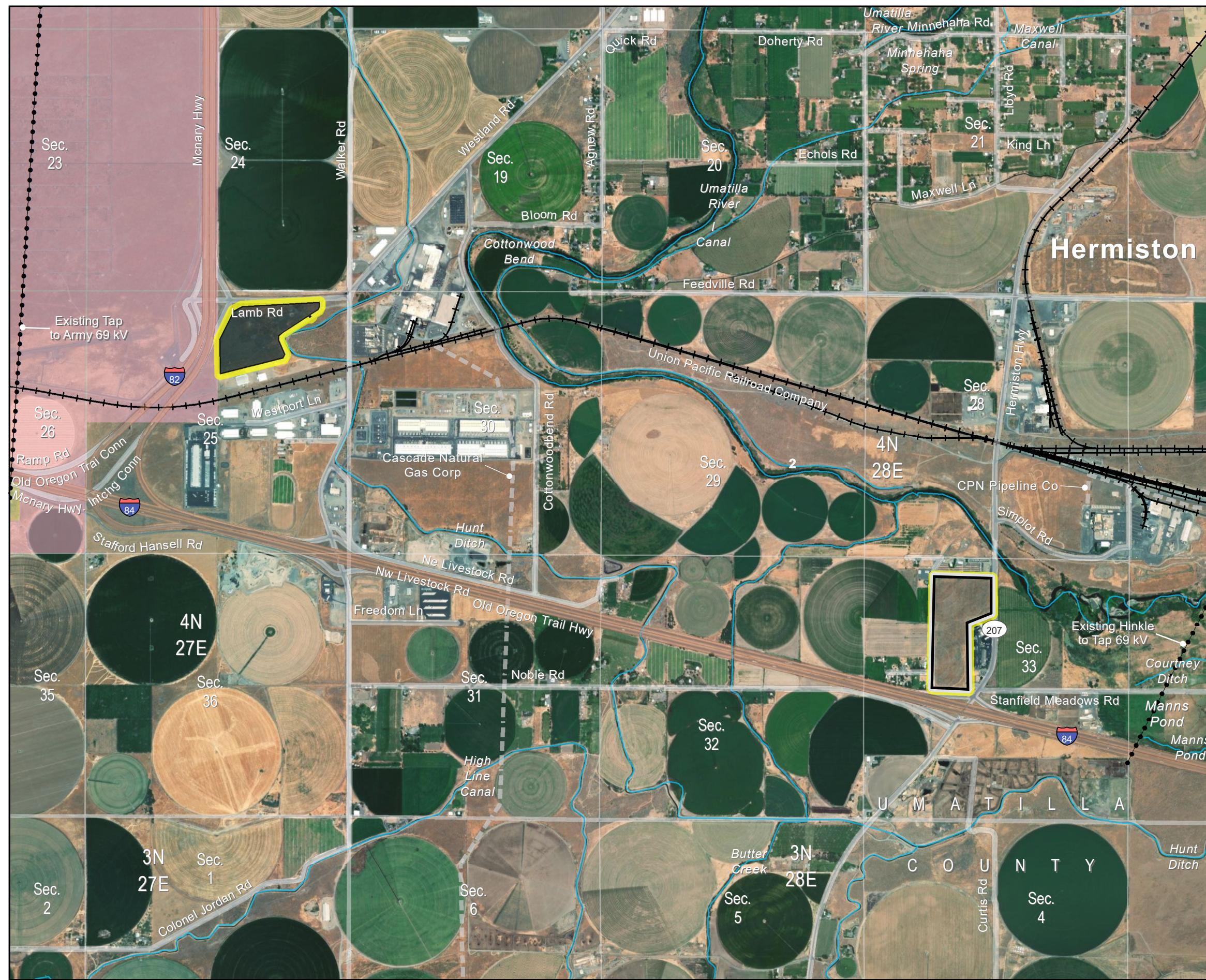
Morrow
Map 1



Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

Umatilla
Map 2



Project Features

- Proposed Site Boundary
- Proposed Micrositing Area Addition
- Previously Approved Micrositing Area

Land Status

- Bureau of Land Management
- Interstate
- Public Roads
- Railroad
- Airport Controlled Airspace (Height Restrictions Apply)
- Private

Important Siting Constraints and Other Features

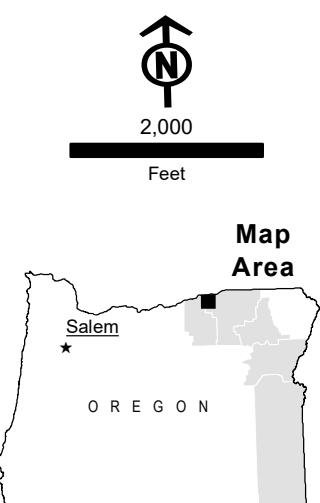
- 20-ft Contours
- Existing Transmission Line
- Pipeline
- Stream
- Interstate
- Public Roads
- Railroad
- Airport Controlled Airspace (Height Restrictions Apply)
- Private

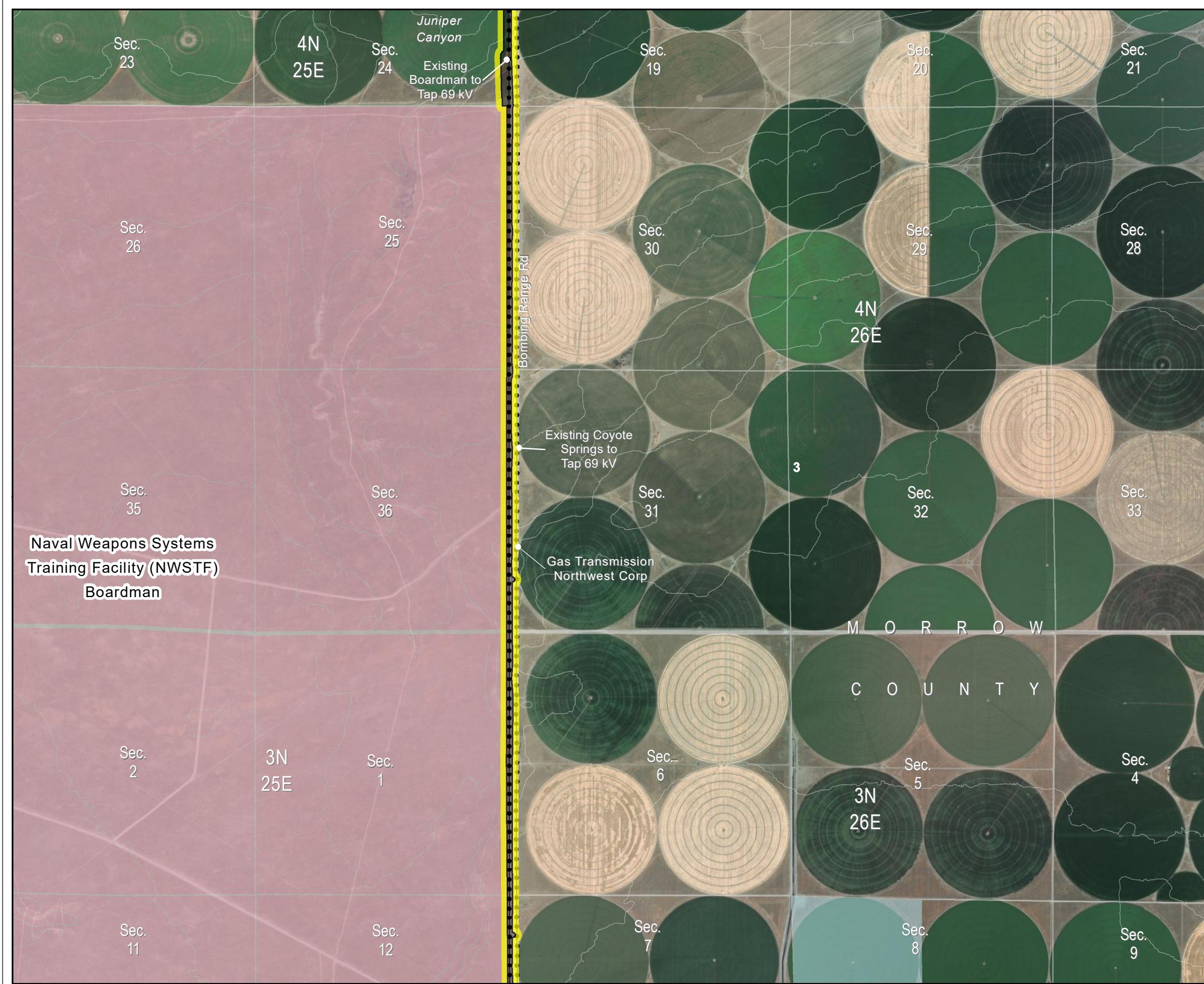
Notes:
Not intended for construction or any uses other than intended purpose.

Project features current as of March 9, 2023.

Data Source(s):
BLM, Esri, FAA, NPS, ODFW, ODOT, StreamNet, USGS, Velocity, Ventyx

Imagery:
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1 Proposed Site Boundary

Morrow

Map 3

Legend:

- 20-ft Contours
- Existing Transmission Line
- Pipeline
- Public Roads

Notes:

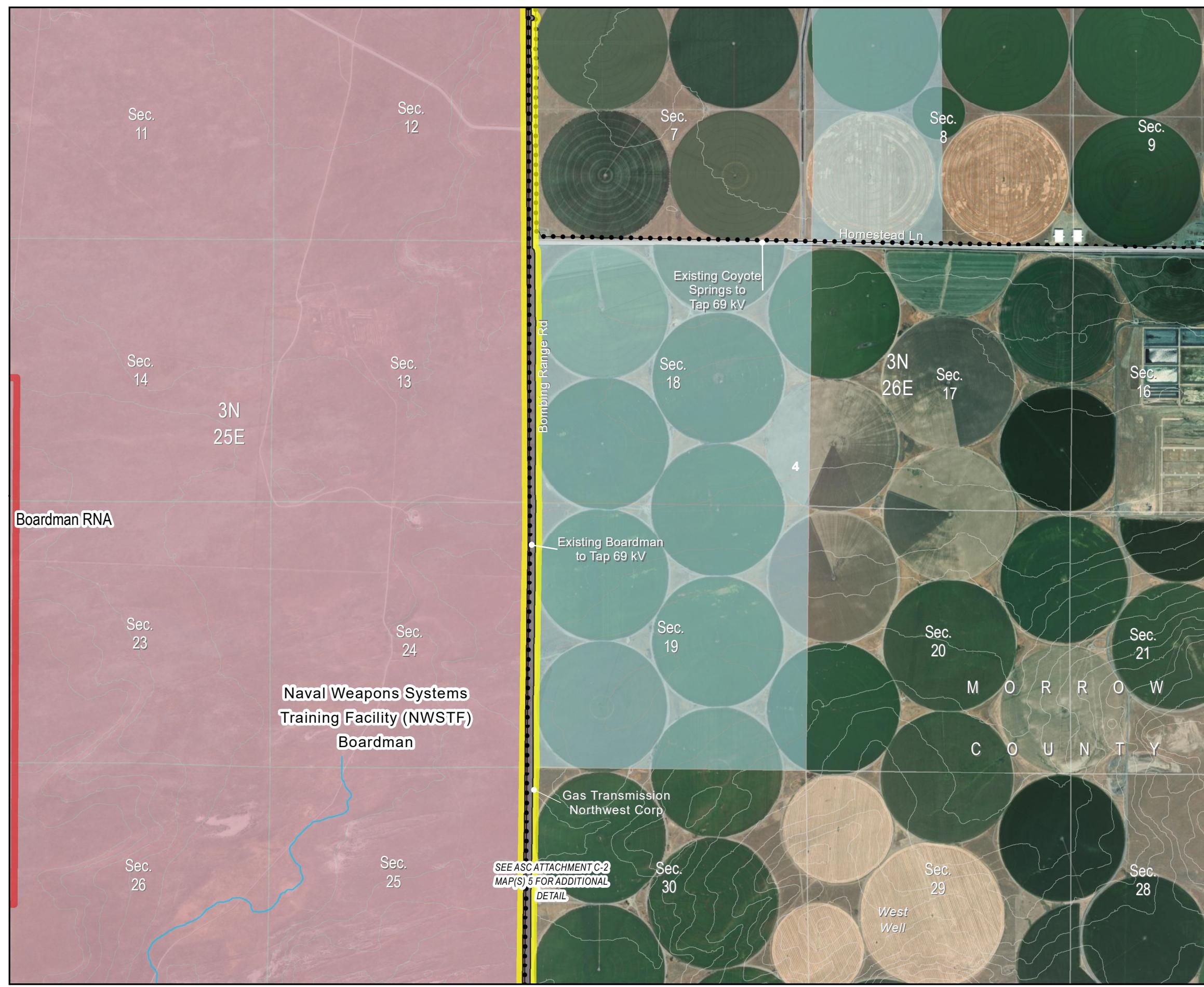
Project features current as of March 9, 2023.

Data Source(s):

Imagery:

A map of Oregon with a box labeled "Map Area" around the northwestern corner. Inside this box, a star marks the location of Salem. Below the map, the word "OREGON" is written in capital letters. At the top of the page is a north arrow and a scale bar indicating 2,000 feet.





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

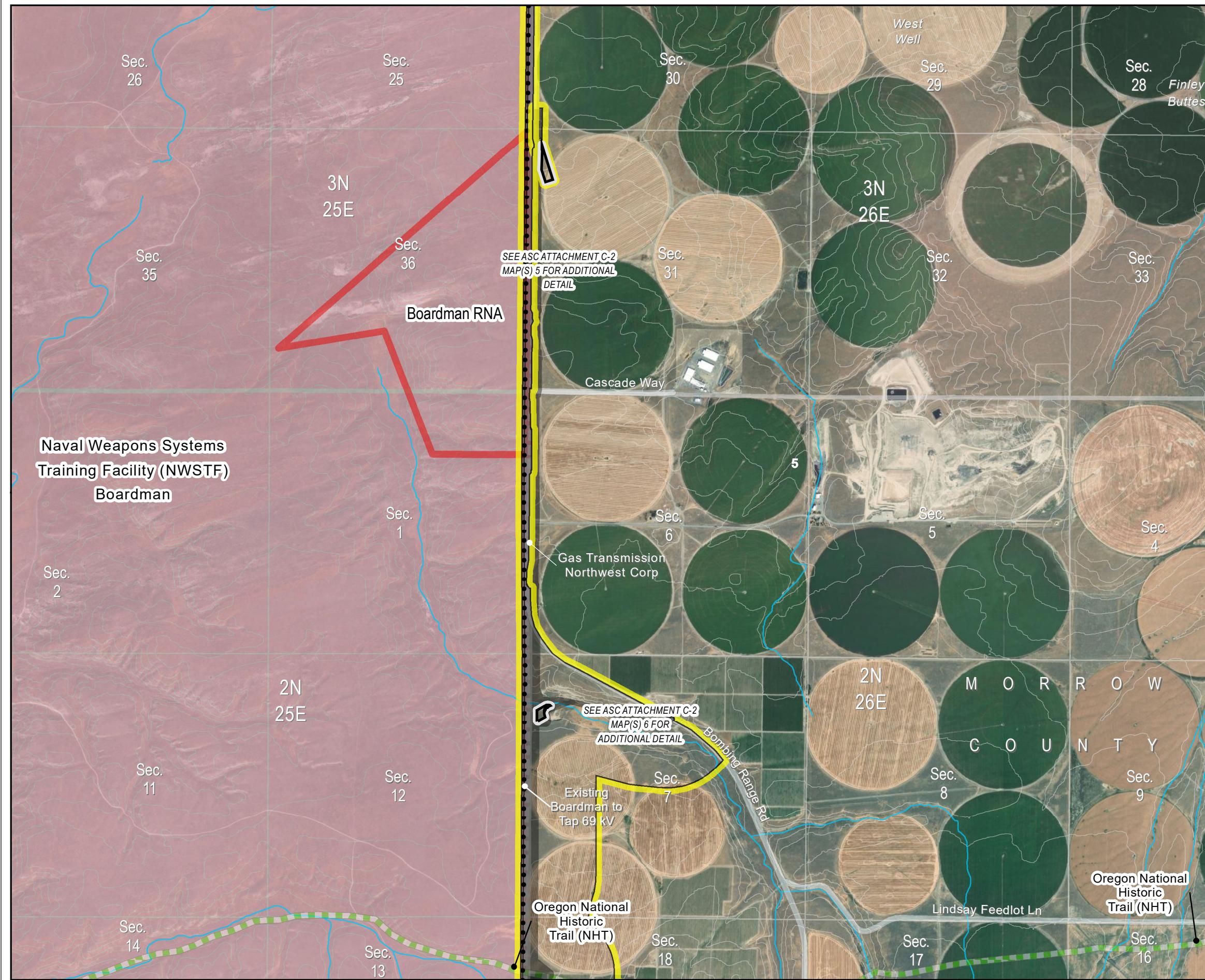
Morrow

Map 4

Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

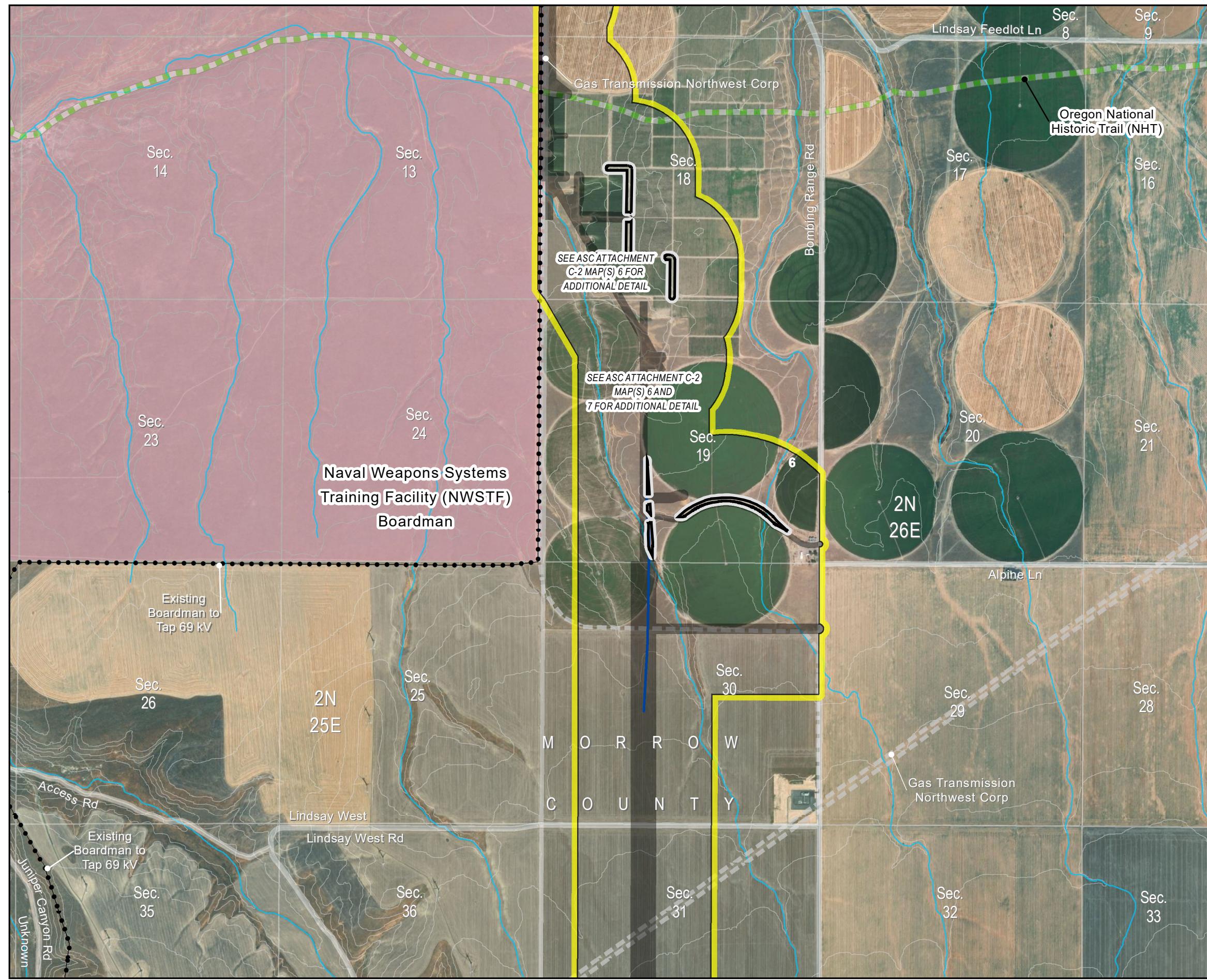
Morrow
Map 5

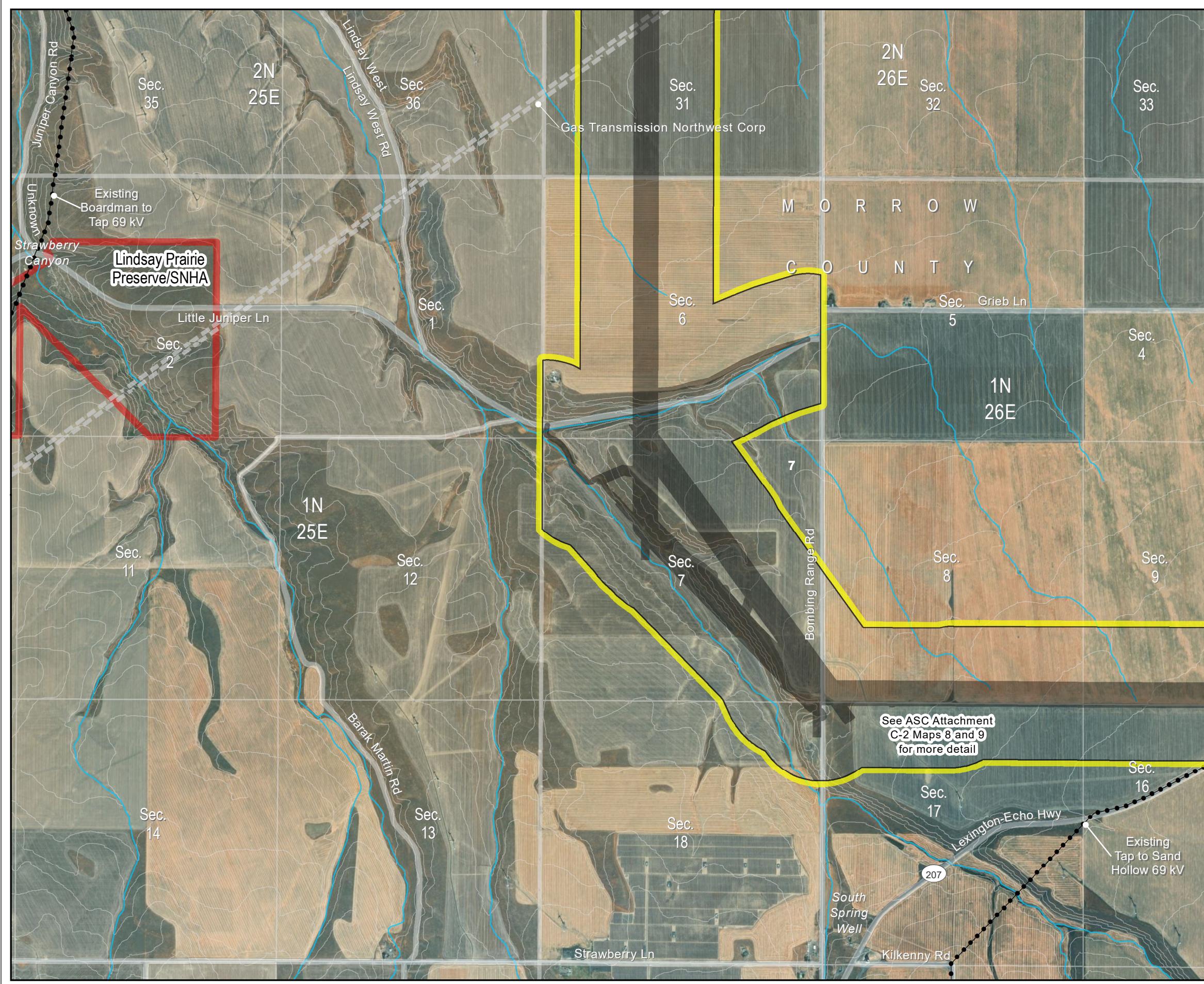


Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

Morrow
Map 6





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

Morrow

Map 7

Project Features

Proposed Site Boundary
Previously Approved
Micrositing Area

Land Status

Private

**Important Siting
Constraints and Other
Features**

- 20-ft Contours
- Existing Transmission Line
- Pipeline
- Stream
- Public Roads
- Protected Area (EFSC)

Notes:
Not intended for construction or any uses
other than intended purpose.

**Project features current as of March 9,
2023.**

Data Source(s):
BLM, Esri, FAA, NPS, ODFW, ODOT,
StreamNet, USGS, Velocity

Imagery:
Source: Esri, Maxar, Earthstar Geographics,
and the GIS User Community

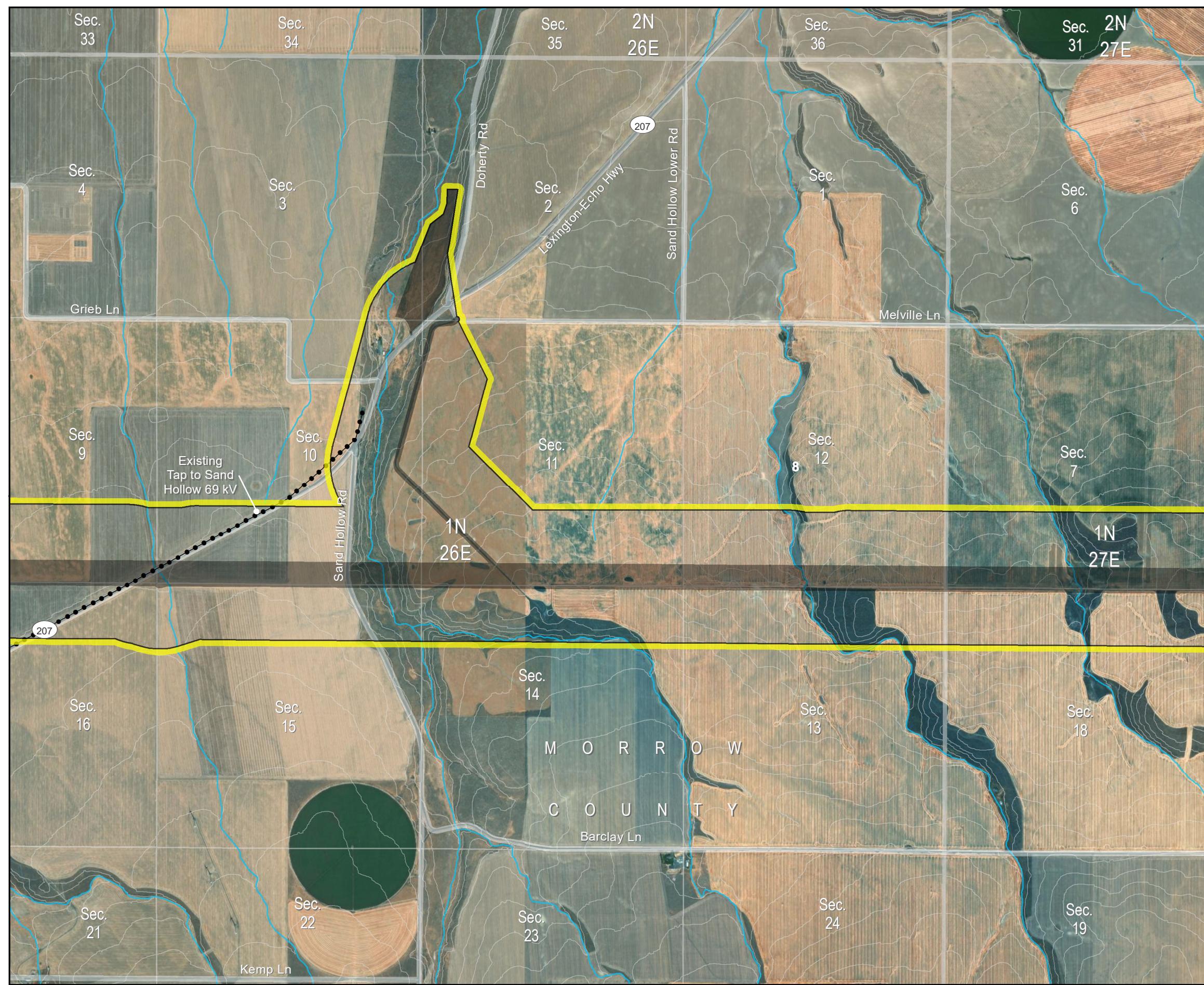


2,000

Feet

**Map
Area**





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

Morrow

Map 8

Important Siting
Constraints and Other
Features

20-ft Contours
Existing Transmission Line
Stream
Public Roads

N
2,000
Feet

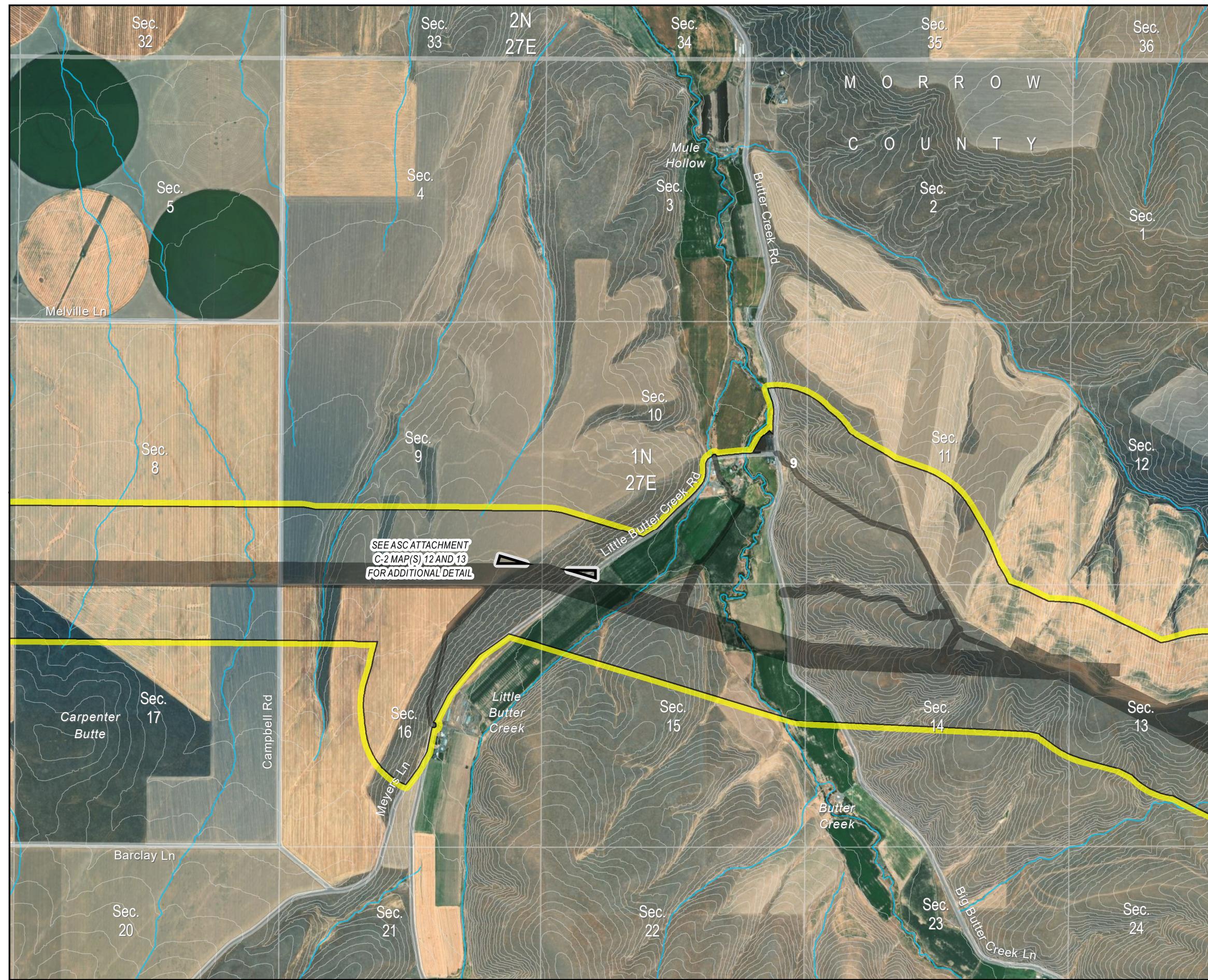


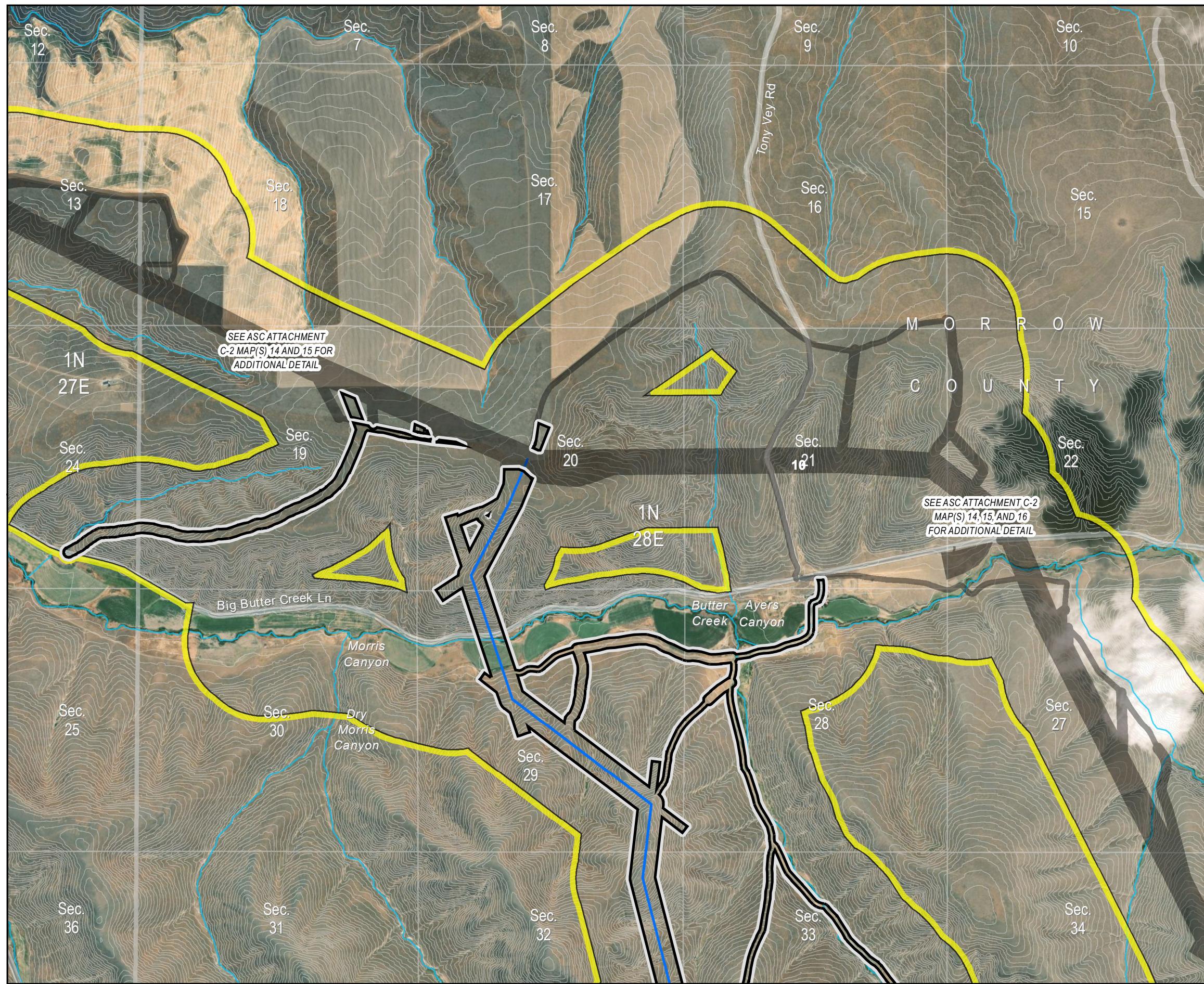
IDAHOPower
An IDACORP Company

Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

Morrow
Map 9





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

Morrow
Map 10

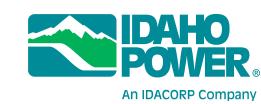
Project Features	Important Siting Constraints and Other Features
Proposed Site Boundary	20-ft Contours
Proposed Micrositing Area	Stream
Addition	Public Roads
Previously Approved Micrositing Area	
Land Status	
Private	

Notes:
Not intended for construction or any uses other than intended purpose.

Project features current as of March 9, 2023.

Data Source(s):
BLM, Esri, FAA, NPS, ODFW, ODOT, StreamNet, USGS, Velocity, Ventyx

Imagery:
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

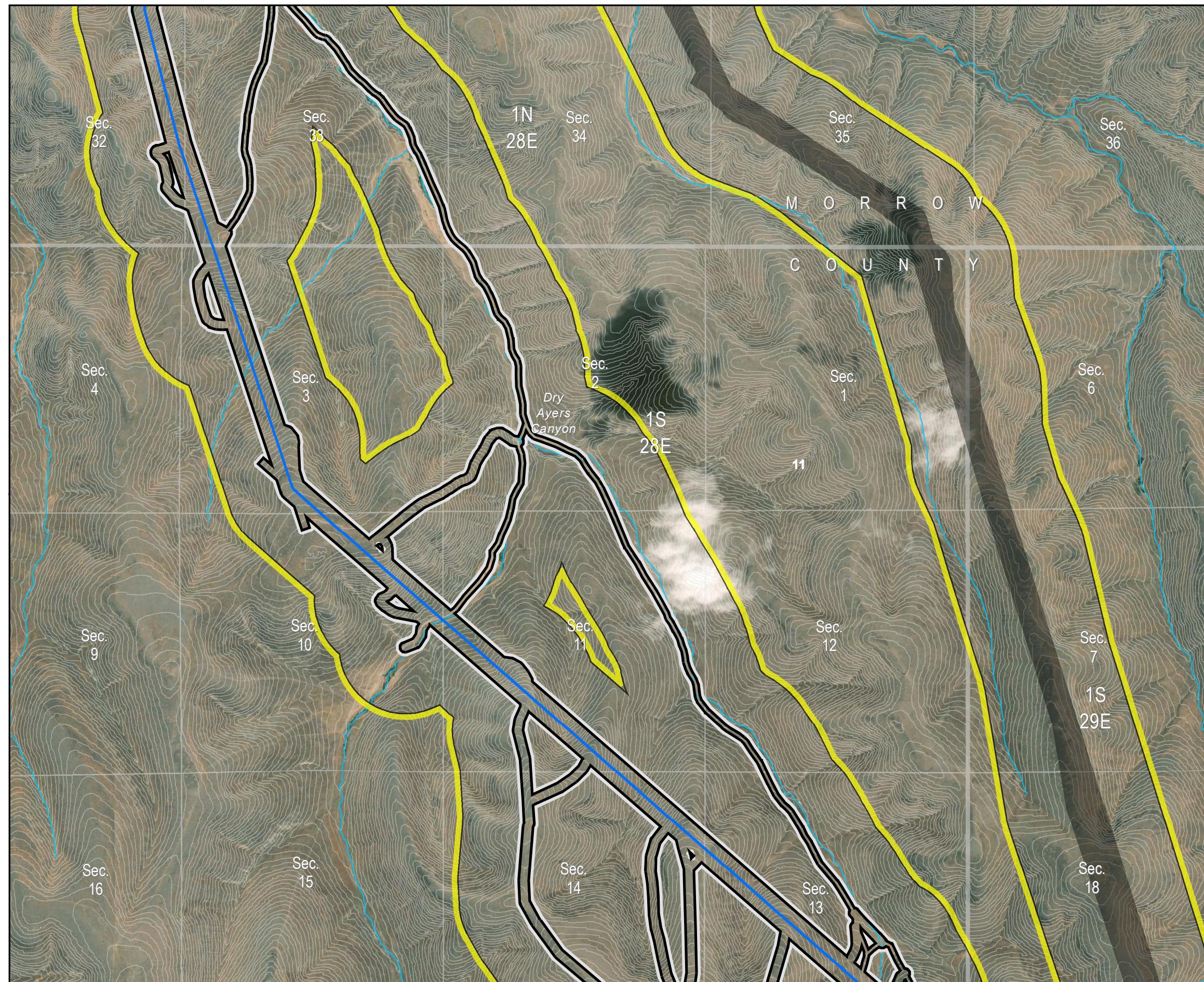


Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

Morrow

Map 11

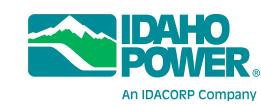


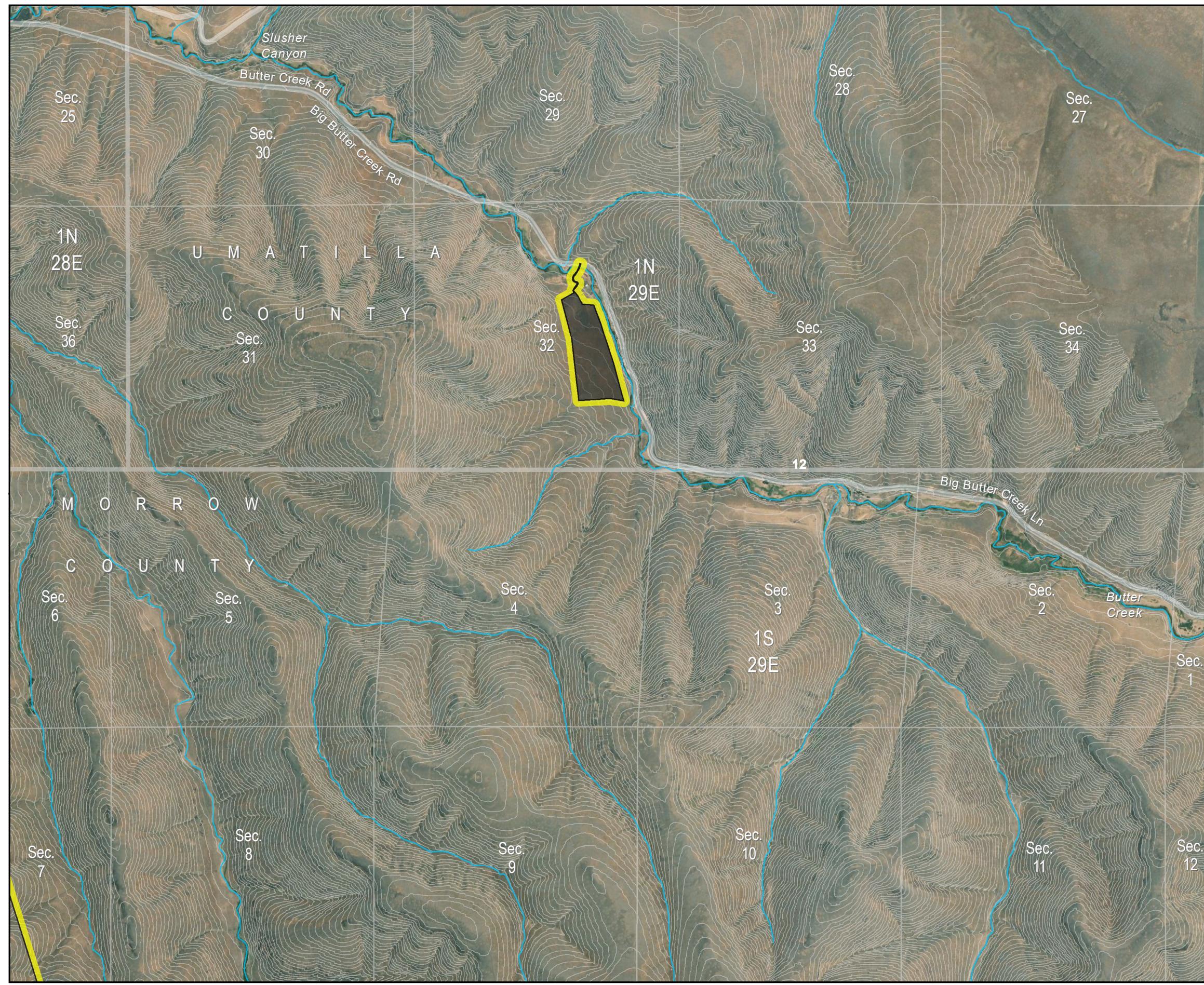
Notes:
Not intended for construction or any uses other than intended purpose.

Project features current as of March 9, 2023.

Data Source(s):
BLM, Esri, FAA, NPS, ODFW, ODOT, StreamNet, USGS, Velocity, Ventyx

Imagery:
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

Morrow
Map 12

Project Features	Important Siting Constraints and Other Features
Proposed Site Boundary	20-ft Contours
Previously Approved	Stream
Micrositing Area	Public Roads

Land Status

Private

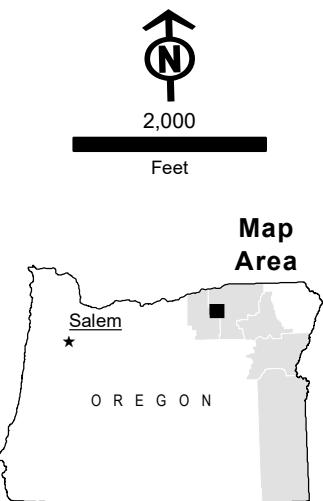
Notes:

Not intended for construction or any uses other than intended purpose.

Project features current as of March 9, 2023.

Data Source(s):
BLM, Esri, FAA, NPS, ODFW, ODOT, StreamNet, USGS, Velocity, Ventyx

Imagery:
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

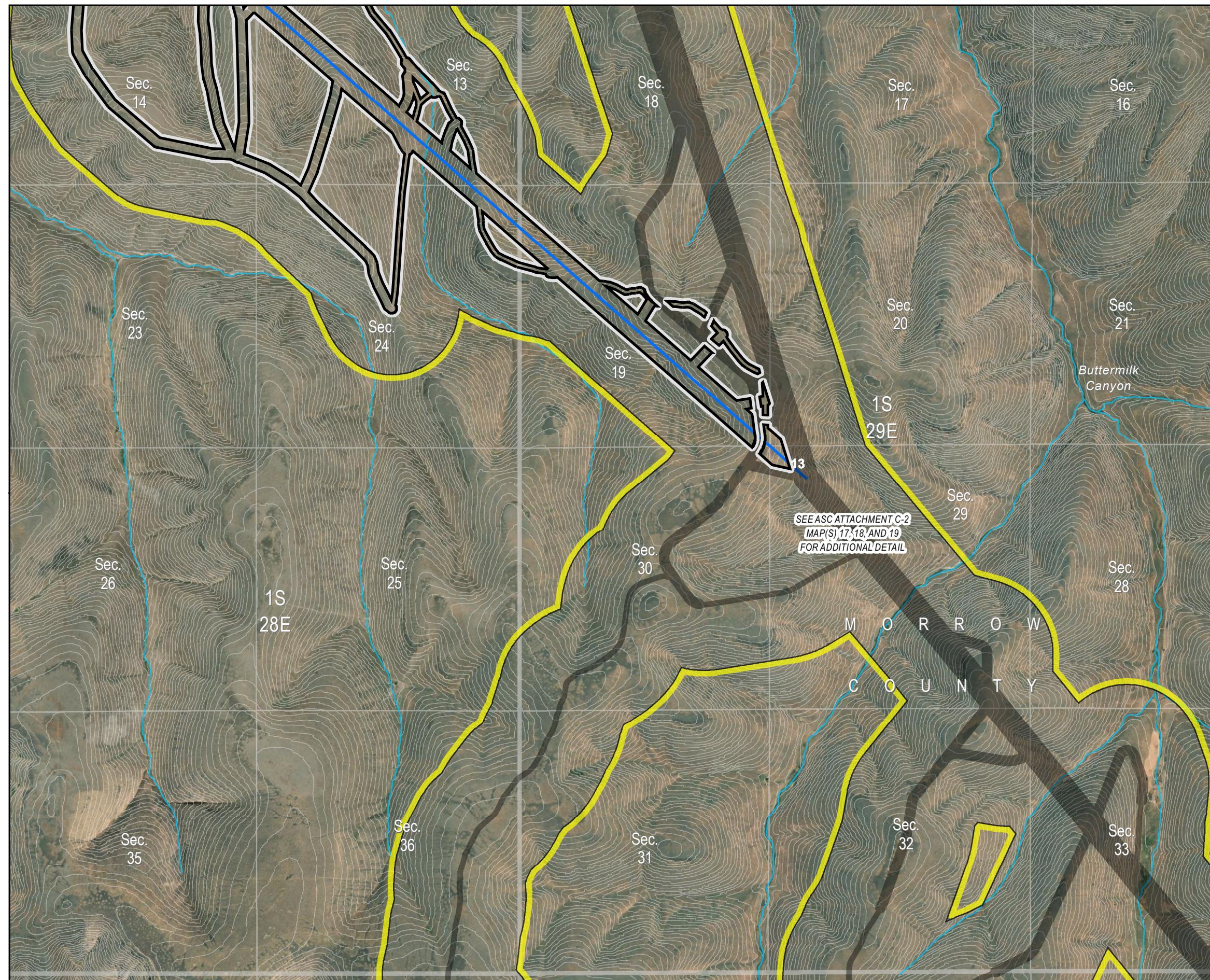


Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

Morrow

Map 13



Project Features
Proposed Site Boundary
Proposed Micrositing Area
Addition
Previously Approved Micrositing Area
Land Status
Private

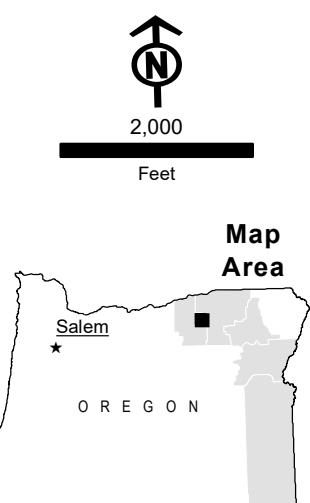
Important Siting Constraints and Other Features
20-ft Contours
Stream

Notes:
Not intended for construction or any uses other than intended purpose.

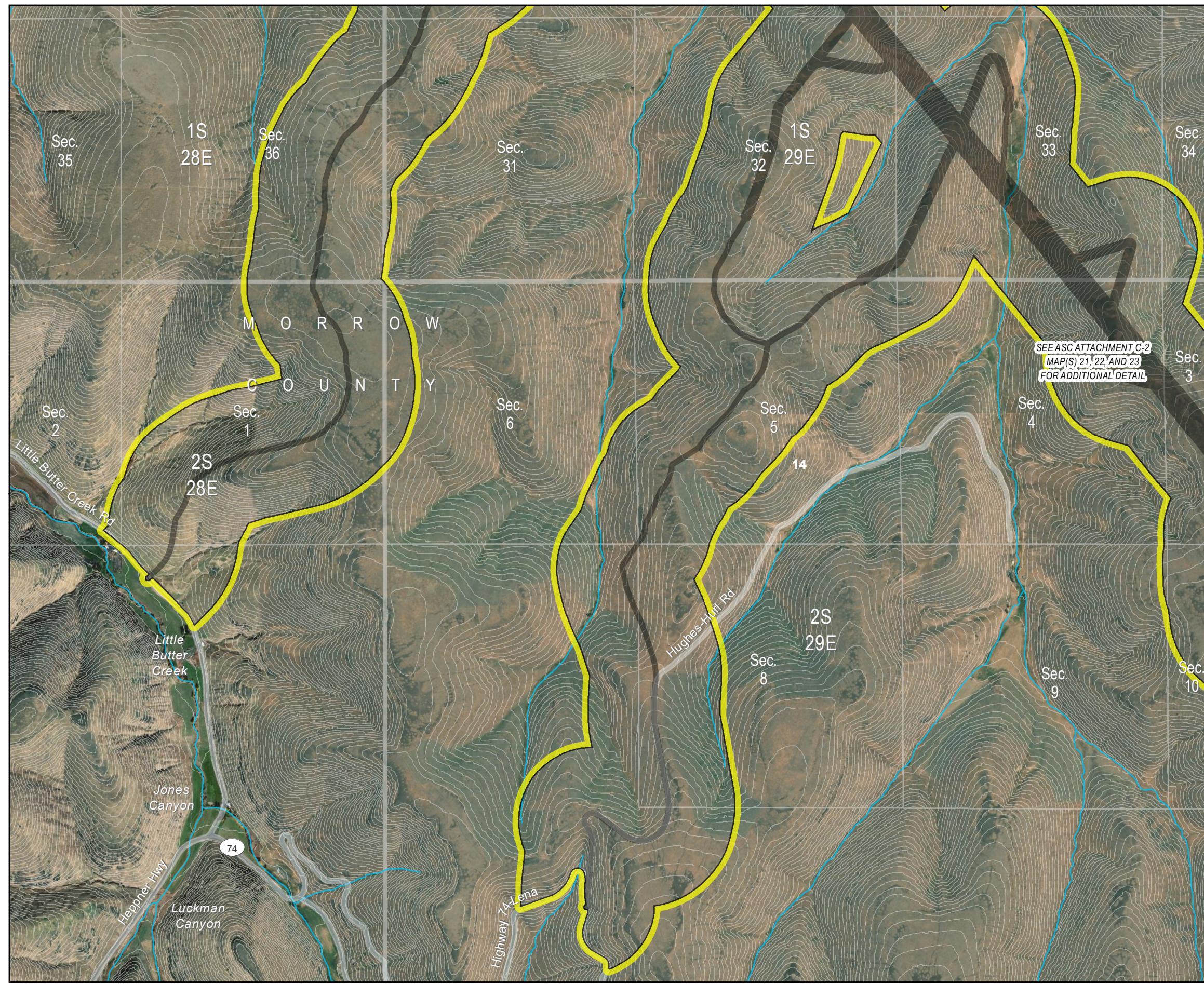
Project features current as of March 9, 2023.

Data Source(s):
BLM, Esri, FAA, NPS, ODFW, ODOT, StreamNet, USGS, Velocity

Imagery:
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



IDAHOPower
An IDACORP Company



Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary

Morrow
Map 14

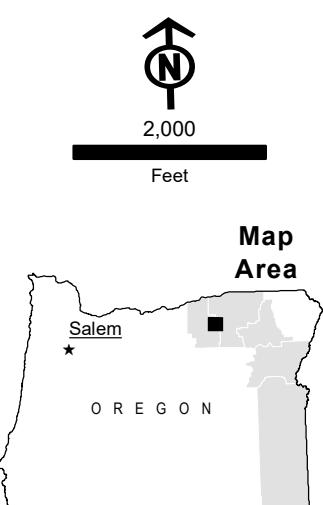
Project Features	Important Siting Constraints and Other Features
Proposed Site Boundary	20-ft Contours
Previously Approved Micrositing Area	Stream
Land Status	Public Roads
Private	

Notes:
Not intended for construction or any uses other than intended purpose.

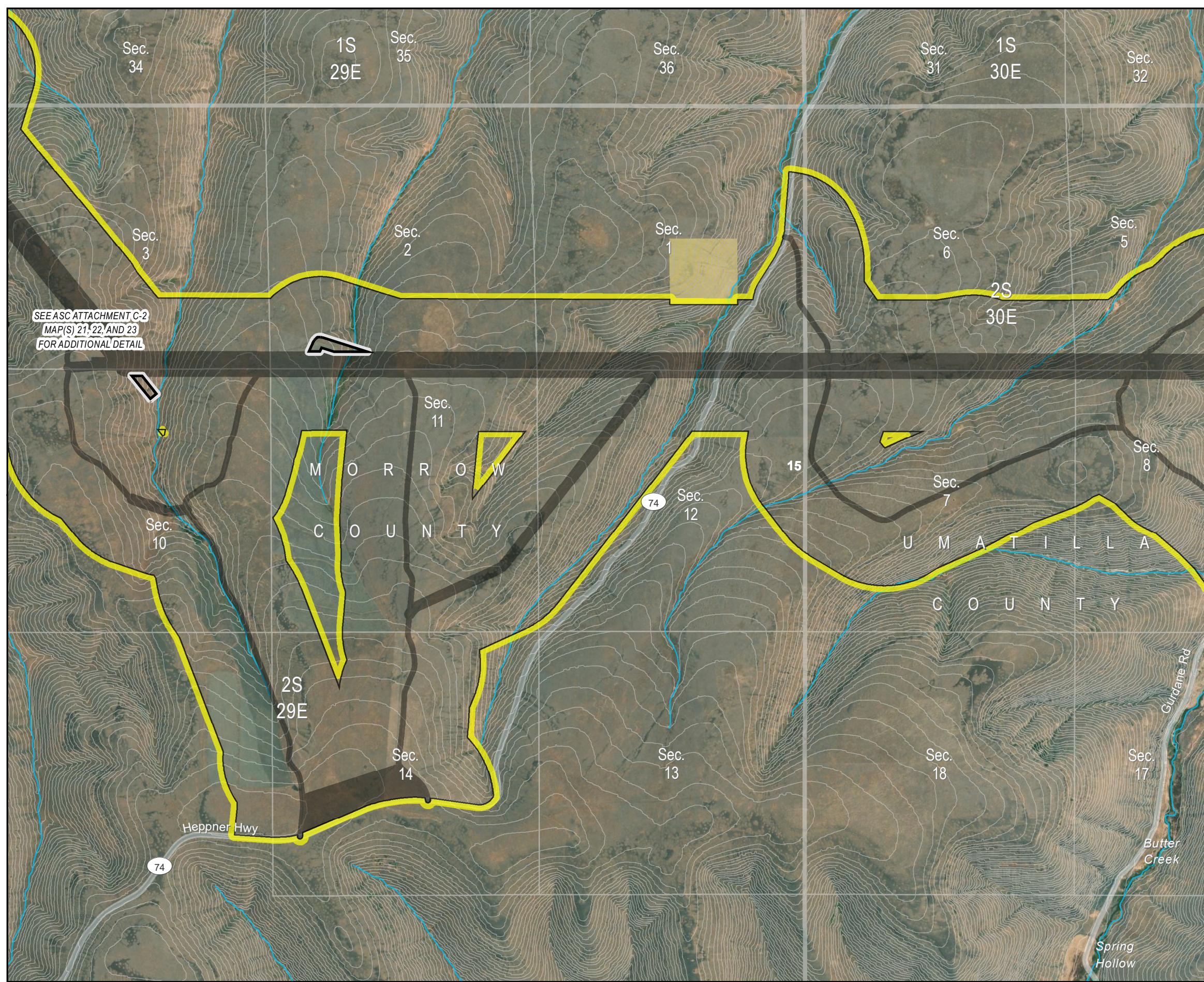
Project features current as of March 9, 2023.

Data Source(s):
BLM, Esri, FAA, NPS, ODFW, ODOT, StreamNet, USGS, Velocity, Ventyx

Imagery:
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

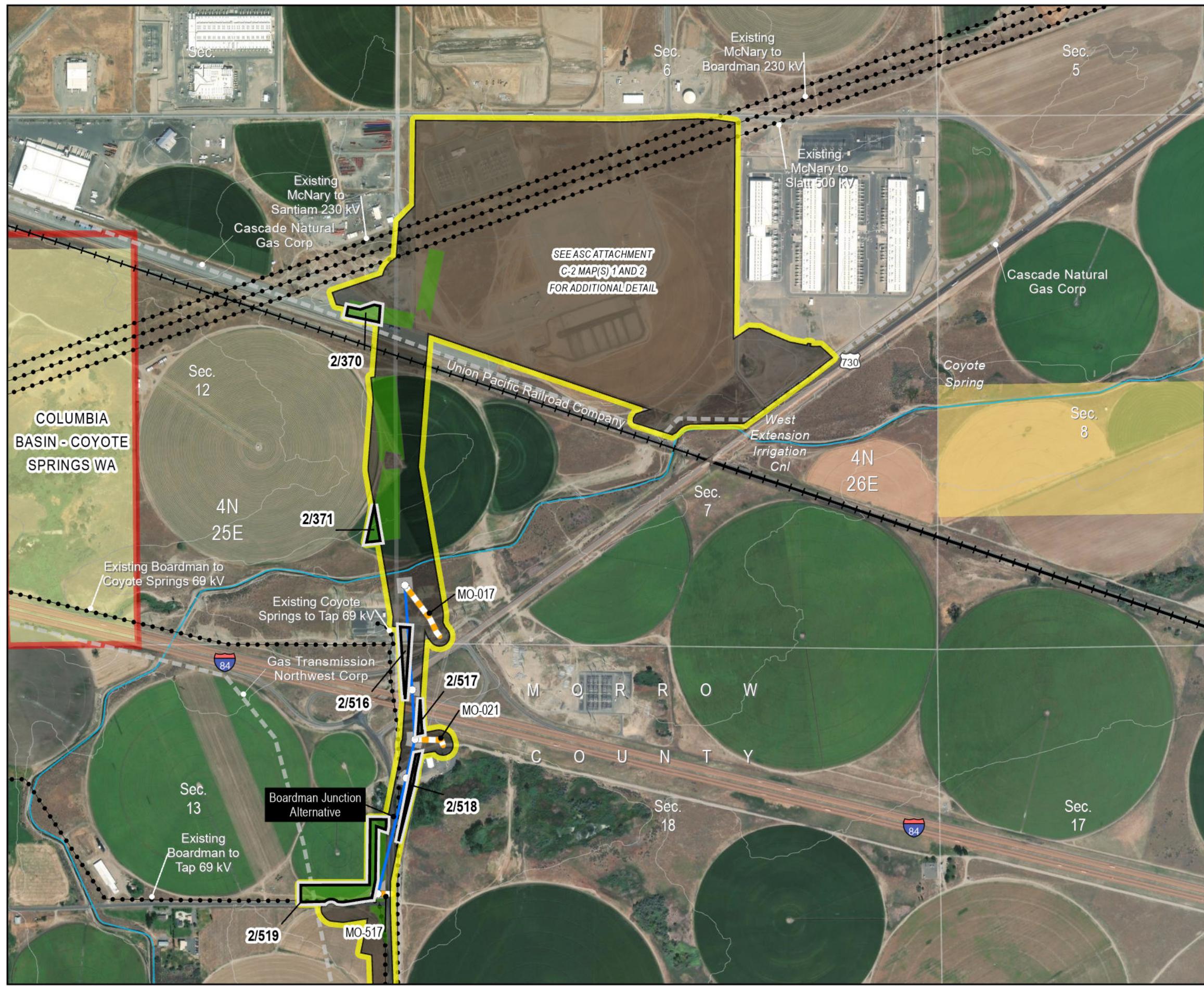


IDAHOPower
An IDACORP Company



Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 8-1
Proposed Site Boundary



Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing
Area Additions
Morrow County
Map 1

Project Features		Important Siting Constraints and Other Features	
Proposed Site Boundary		20-ft Contours	
Proposed Micrositing Area Addition		Existing Transmission Line	
Previously Approved Micrositing Area		Pipeline	
Towers_RFA2		Stream	
Access (Unique ID)		Interstate	
New Road, Primitive		Highways	
Transmission Centerline		Railroad	
Work Areas		Protected Area (EFSC)	
Pulling and Tensioning		20-ft Contours	
Structure Work Area		Existing Transmission Line	
Land Status		Project Features	
Bureau of Land Management		Proposed Site Boundary	
Bureau of Reclamation		Proposed Micrositing Area Addition	
Other Federal		Previously Approved Micrositing Area	
Private		Towers_RFA2	

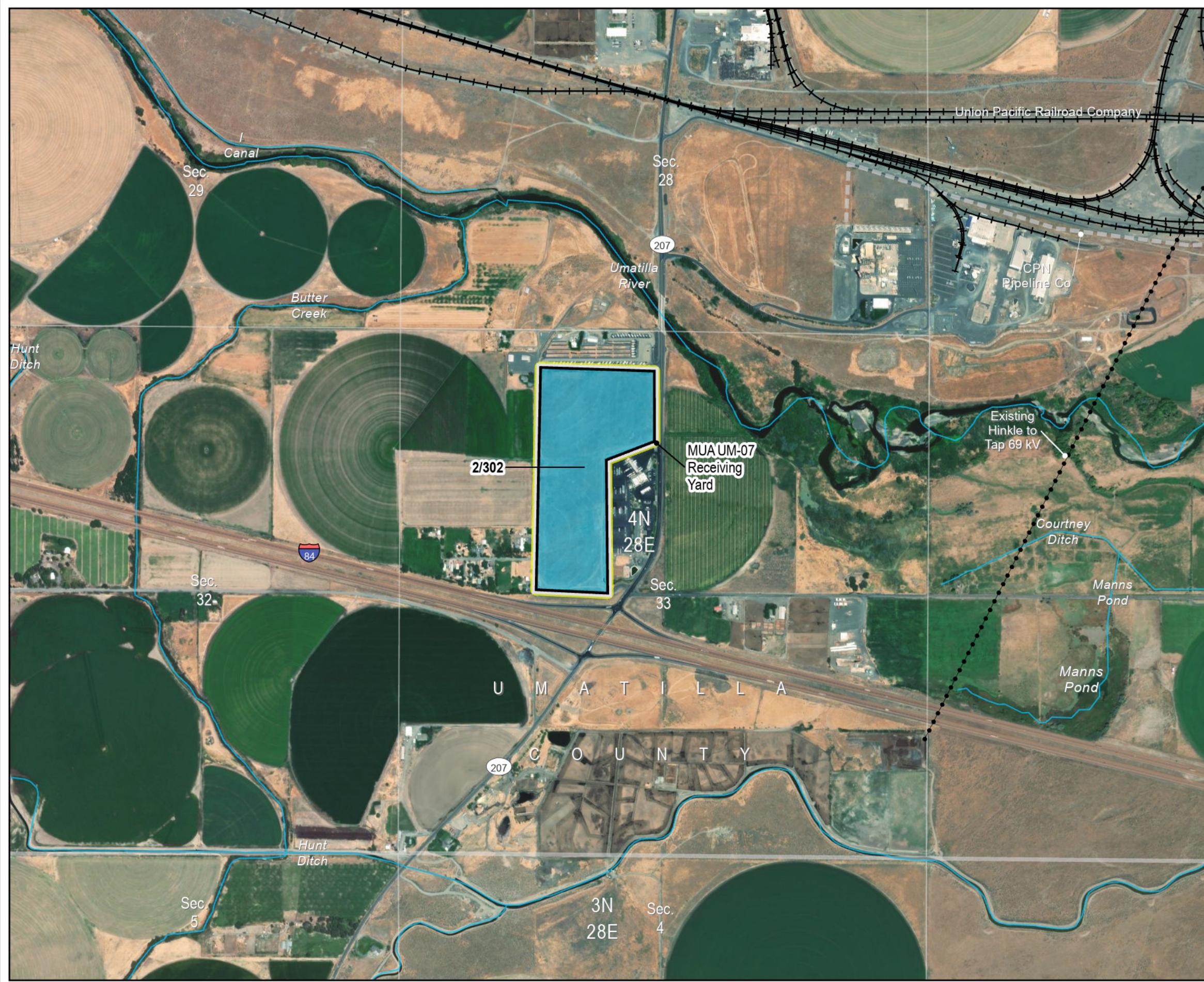
Notes:
Not intended for construction or any uses other than intended purpose.

Project features current as of December 5, 2023.

Data Source(s):
BLM, Esri, FAA, NPS, ODFW, ODOT, StreamNet, USGS, Velocity, Vertyx

Imagery:
World Imagery: Maxar





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing
Area Additions
Umatilla County
Map 2

The legend is organized into three main sections: Project Features, Work Areas, and Land Status. The Project Features section includes: Proposed Site Boundary (yellow line), Proposed Micrositing Area Addition (black line), and Multi-Use Area (light blue line). The Work Areas section includes: Existing Transmission Line (black dot), Pipeline (grey line), Stream (blue wavy line), Interstate (orange line), Railroad (black plus sign), and Land Status (white square). The Land Status section includes: Private (white square), Public (light blue square), and Protected (green square).

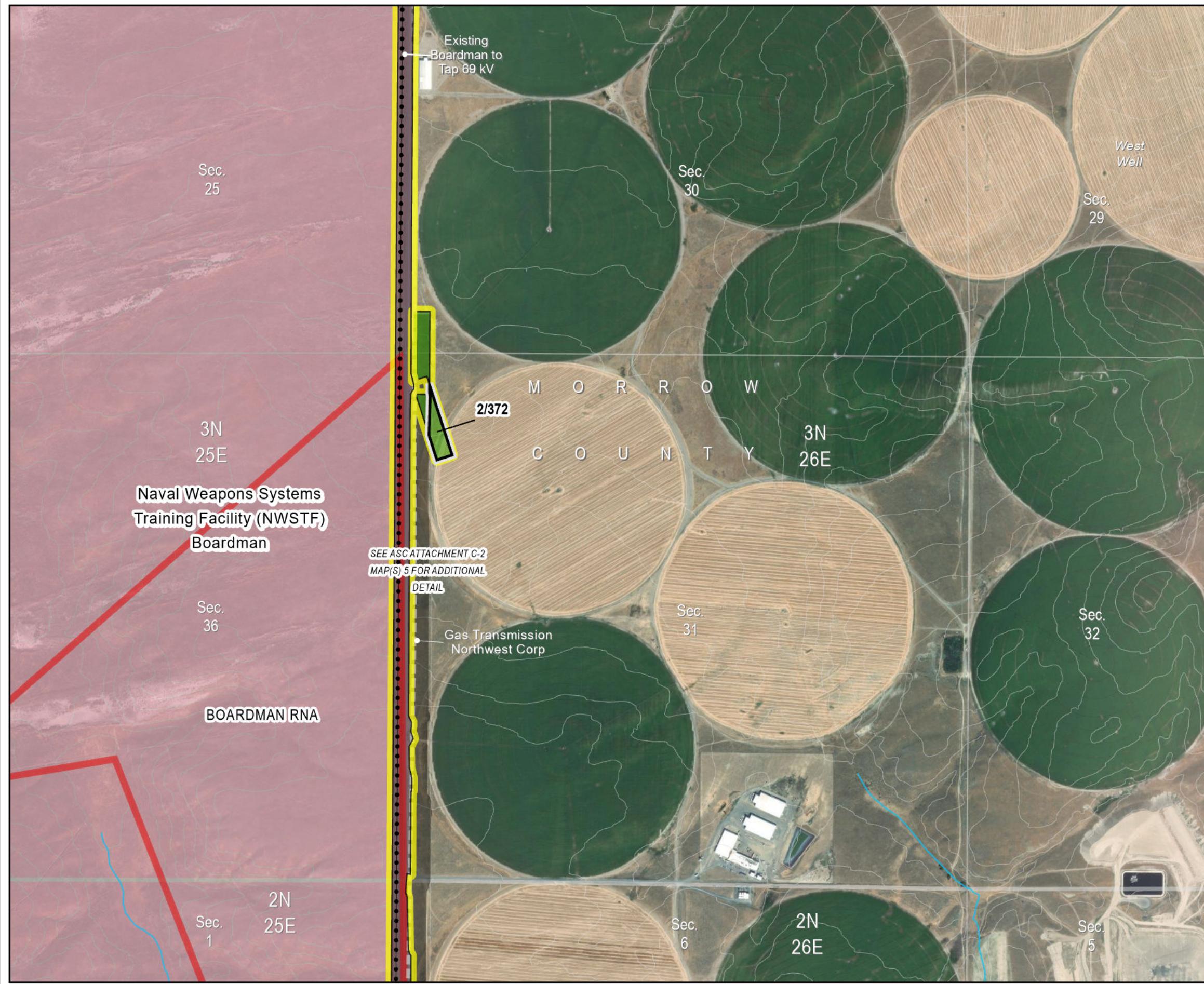
Notes:

Project features current as of December 5, 2023.

Data Source(s):
BLM, Esri, FAA, NPS, ODFW, ODOT,
StreamNet, USGS, Velocity, Ventyx

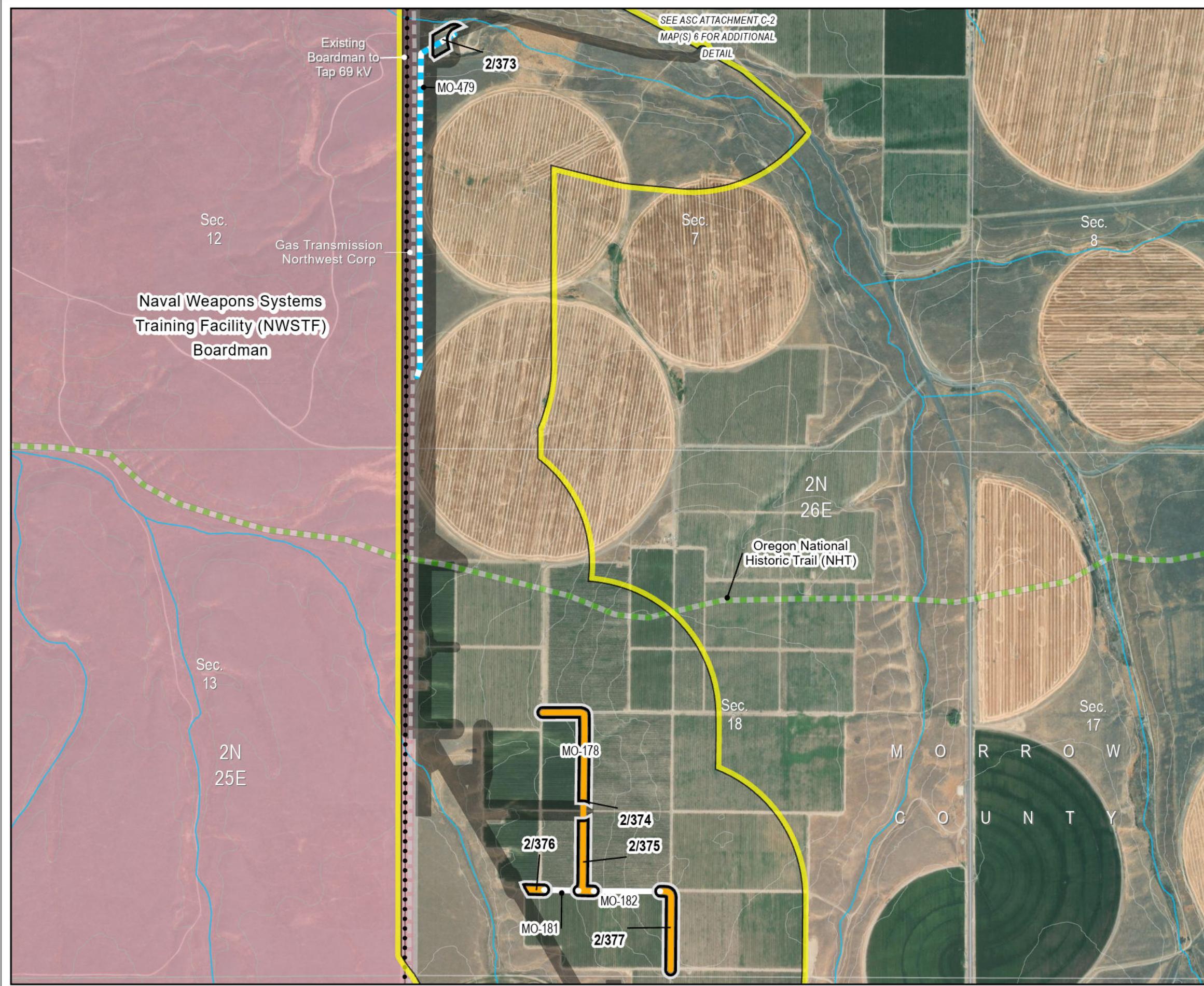
Imagery:





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing Area Additions
Morrow County
Map 3

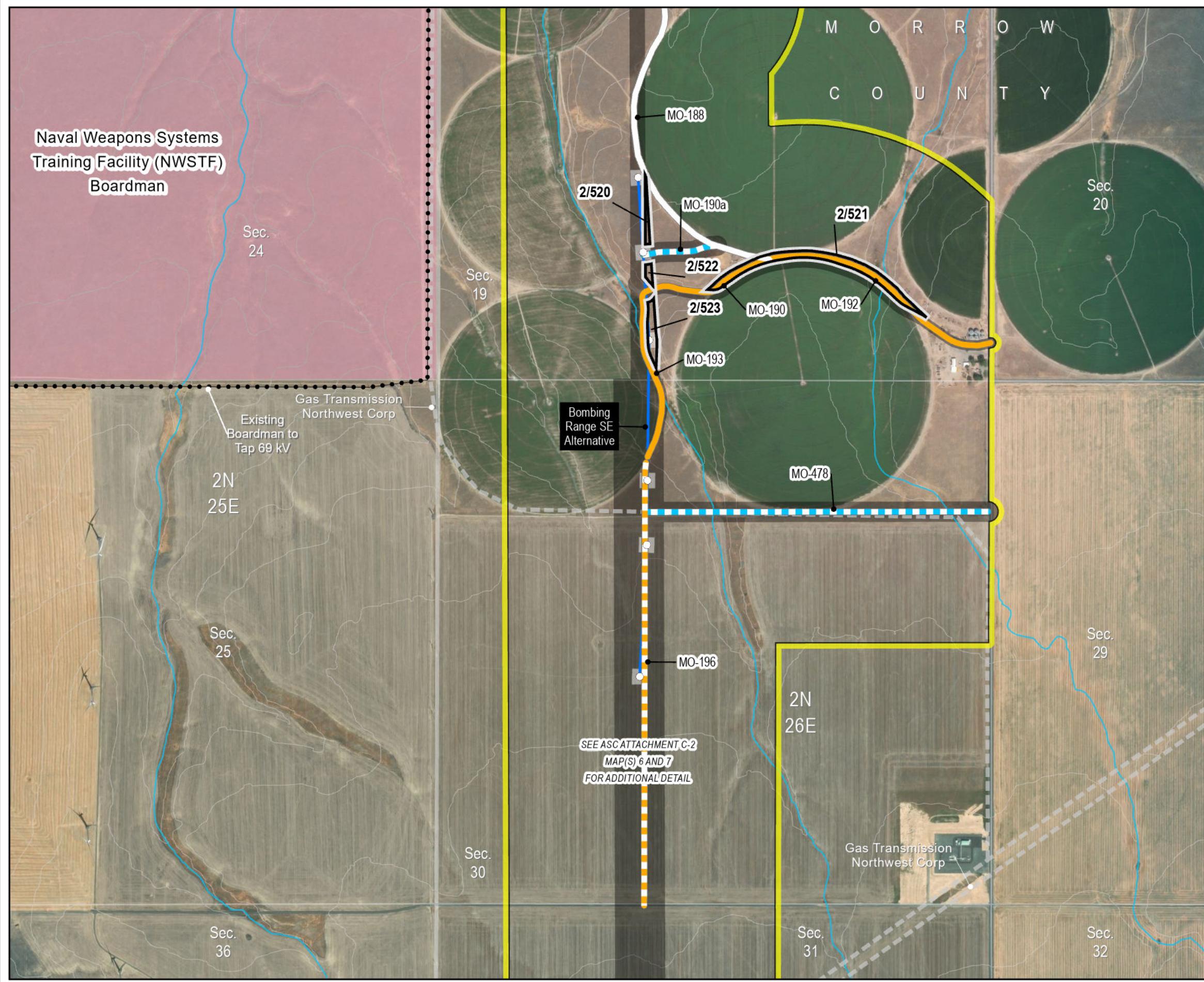


Boardman to Hemingway Transmission Project Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing Area Additions

Morrow County

Map 4



Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing
Area Additions
Morrow County
Map 5



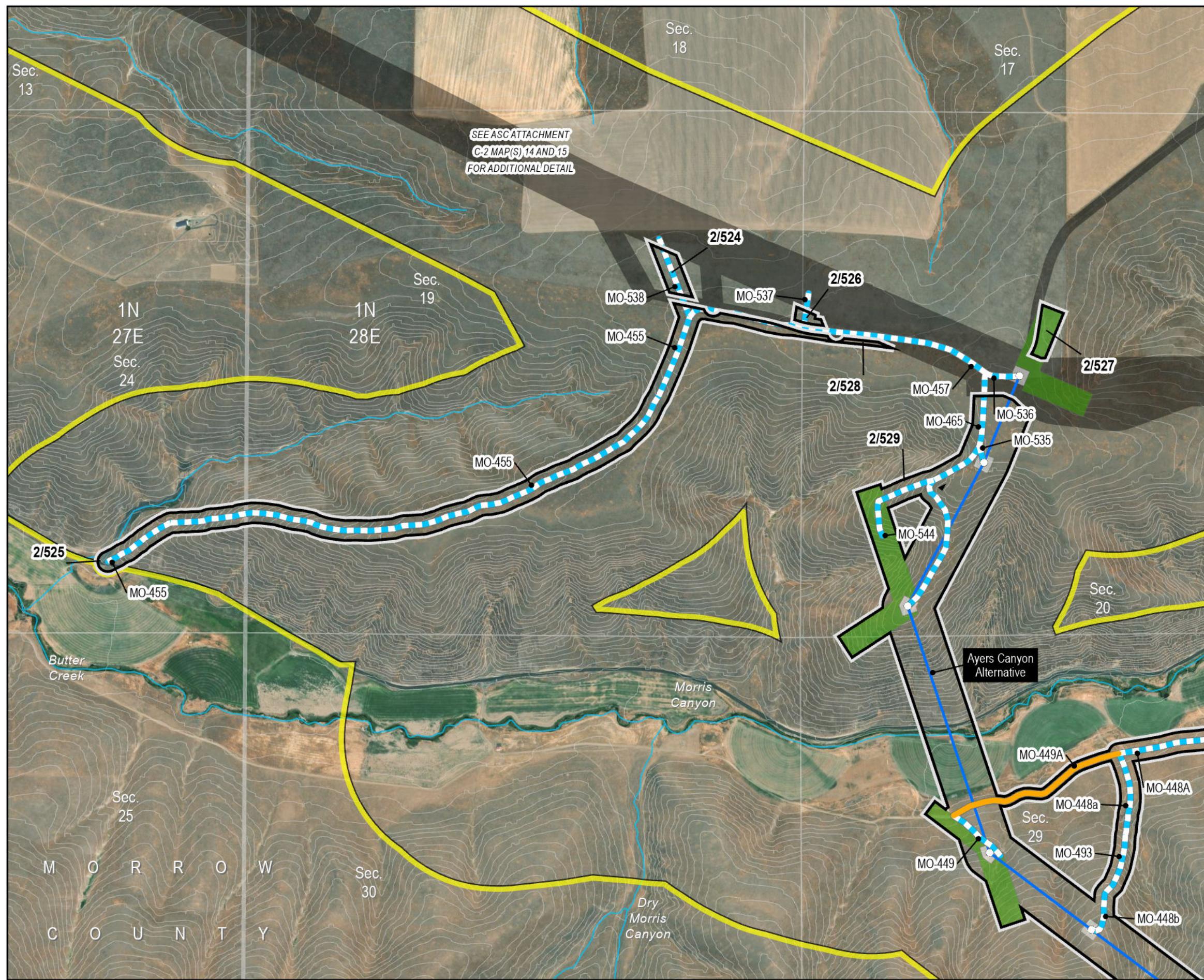


Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing
Area Additions
Morrow County

Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing
Area Additions
Morrow County
Map 7





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing
Area Additions
Morrow County
Map 8

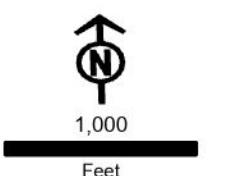
Project Features	Important Siting Constraints and Other Features
 Proposed Site Boundary	 20-ft Contours
 Proposed Micrositing Area Addition	 Stream
 Previously Approved Micrositing Area	 Land Status
Access (Unique ID)	 Private
Existing Road, Substantial Modification, 21-70% Improvements	
 New Road, Bladed	

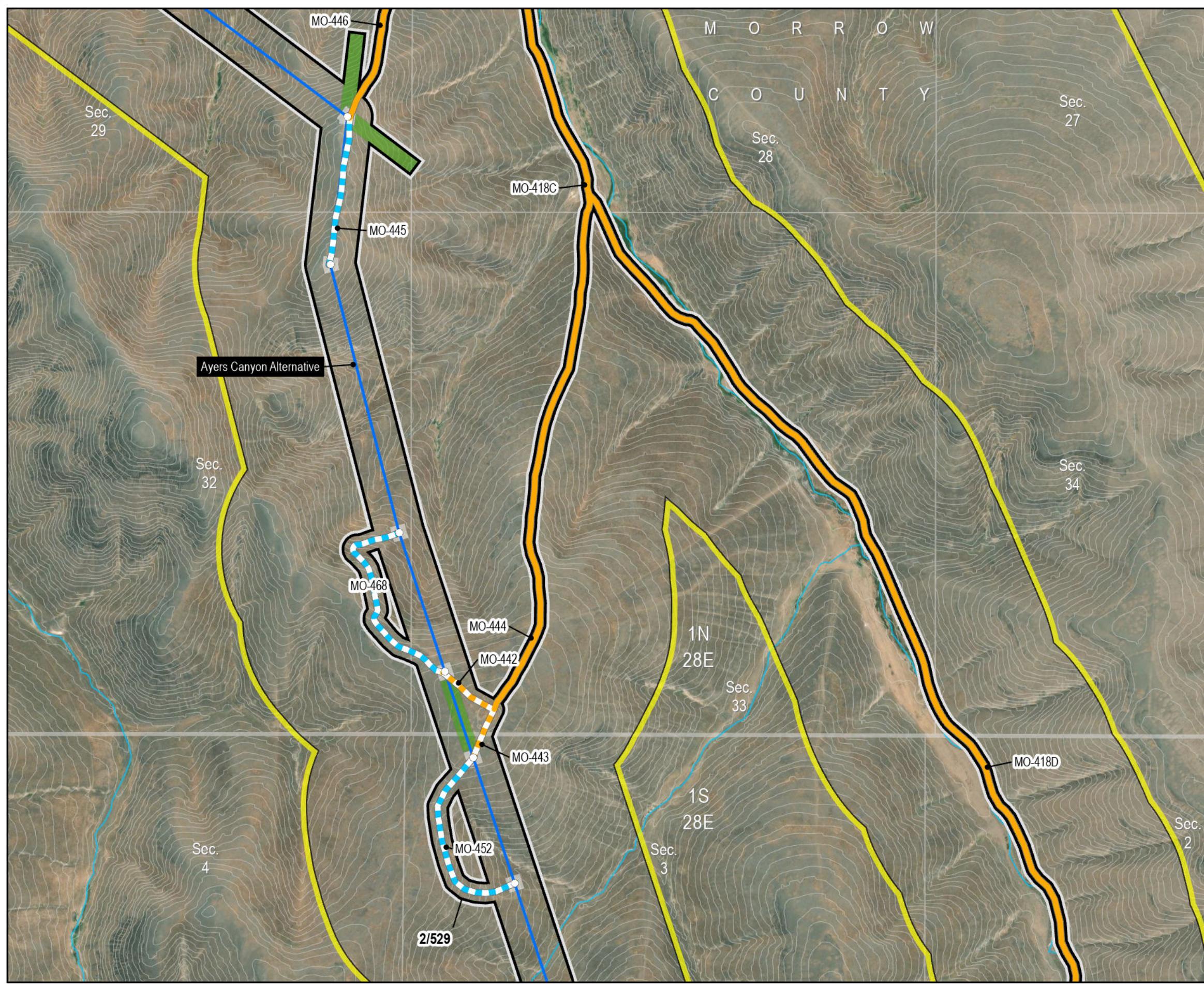
Notes:

Project features current as of December 5, 2022

Data Source(s):

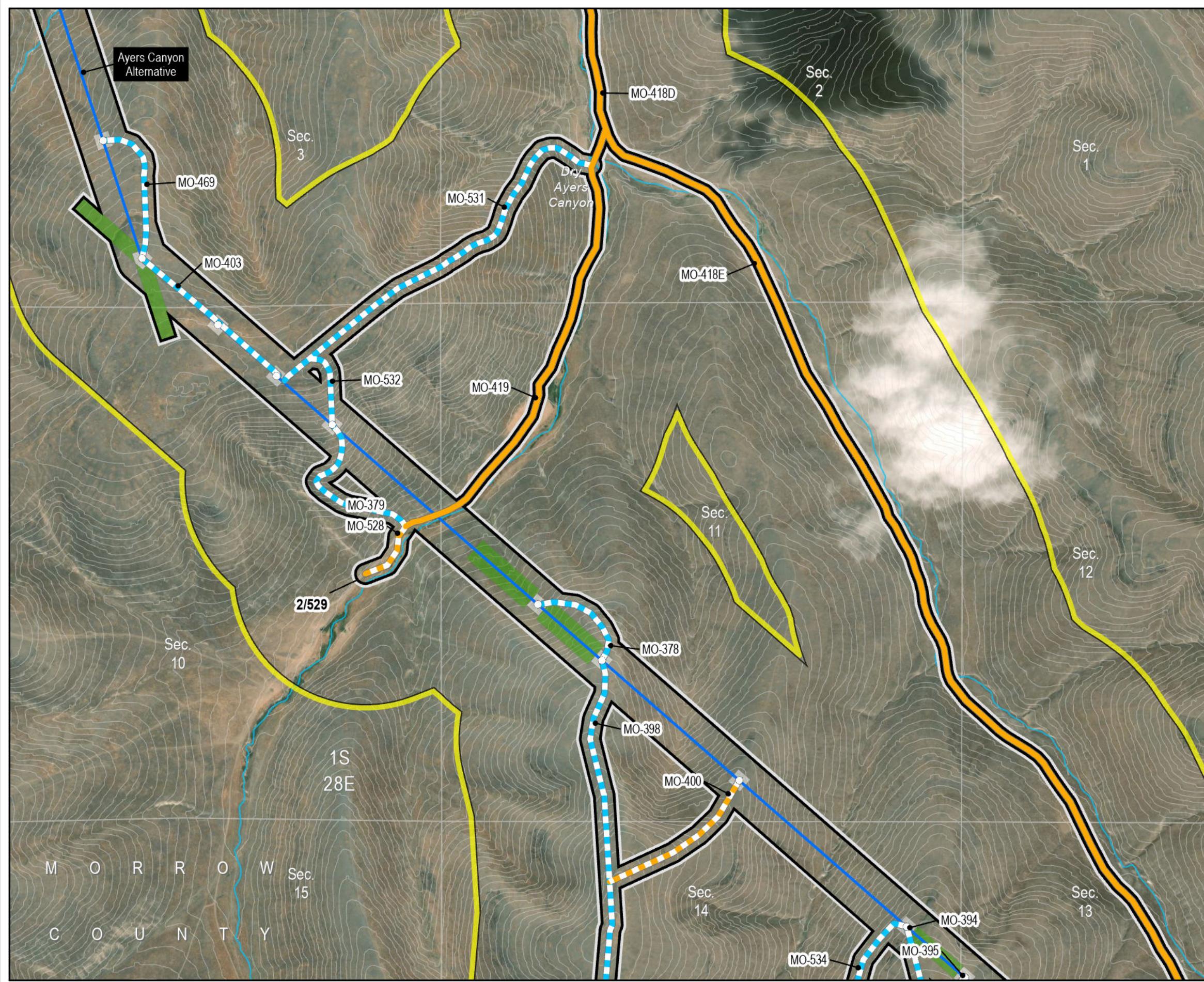
Imagery:





Boardman to Hemingway
Transmission Project
Request for Amendment 2

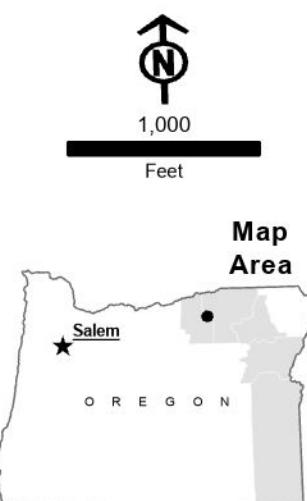
Figure 4-1
RFA2 Proposed Micrositing
Area Additions
Morrow County
Map 9

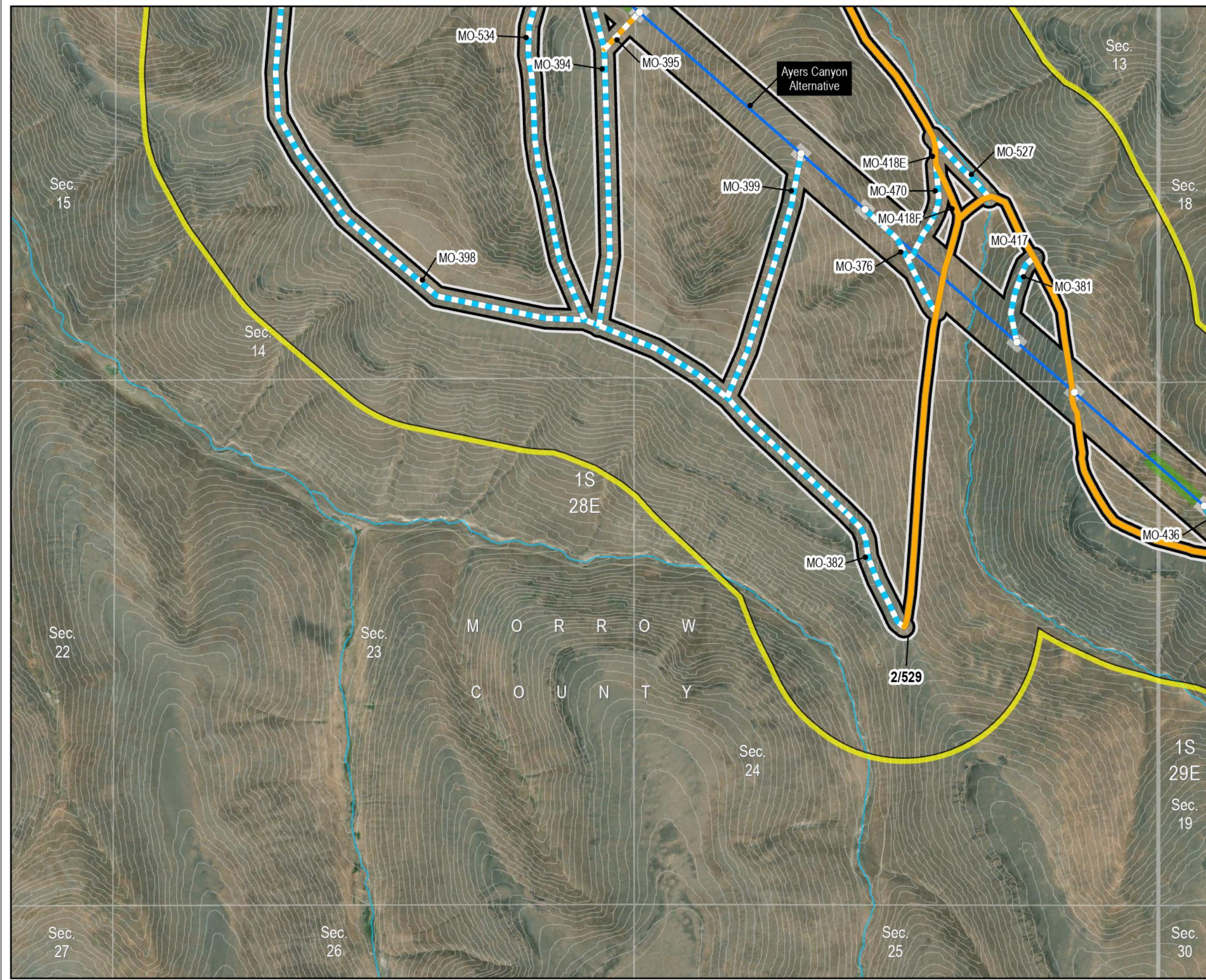


Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing
Area Additions
Morrow County

Map 10





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing
Area Additions
Morrow County
Map 11

Project Features		Important Siting Constraints and Other Features	
Proposed Site Boundary		20-ft Contours	
Proposed Micrositing Area Addition		Stream	
Towers_RFA2		Land Status	
Access (Unique ID)		Private	
Existing Road, Substantial			
Modification, 21-70% Improvements			
New Road, Bladed			
New Road, Primitive			
Transmission Centerline			
Work Areas			
Pulling and Tensioning			
Structure Work Area			

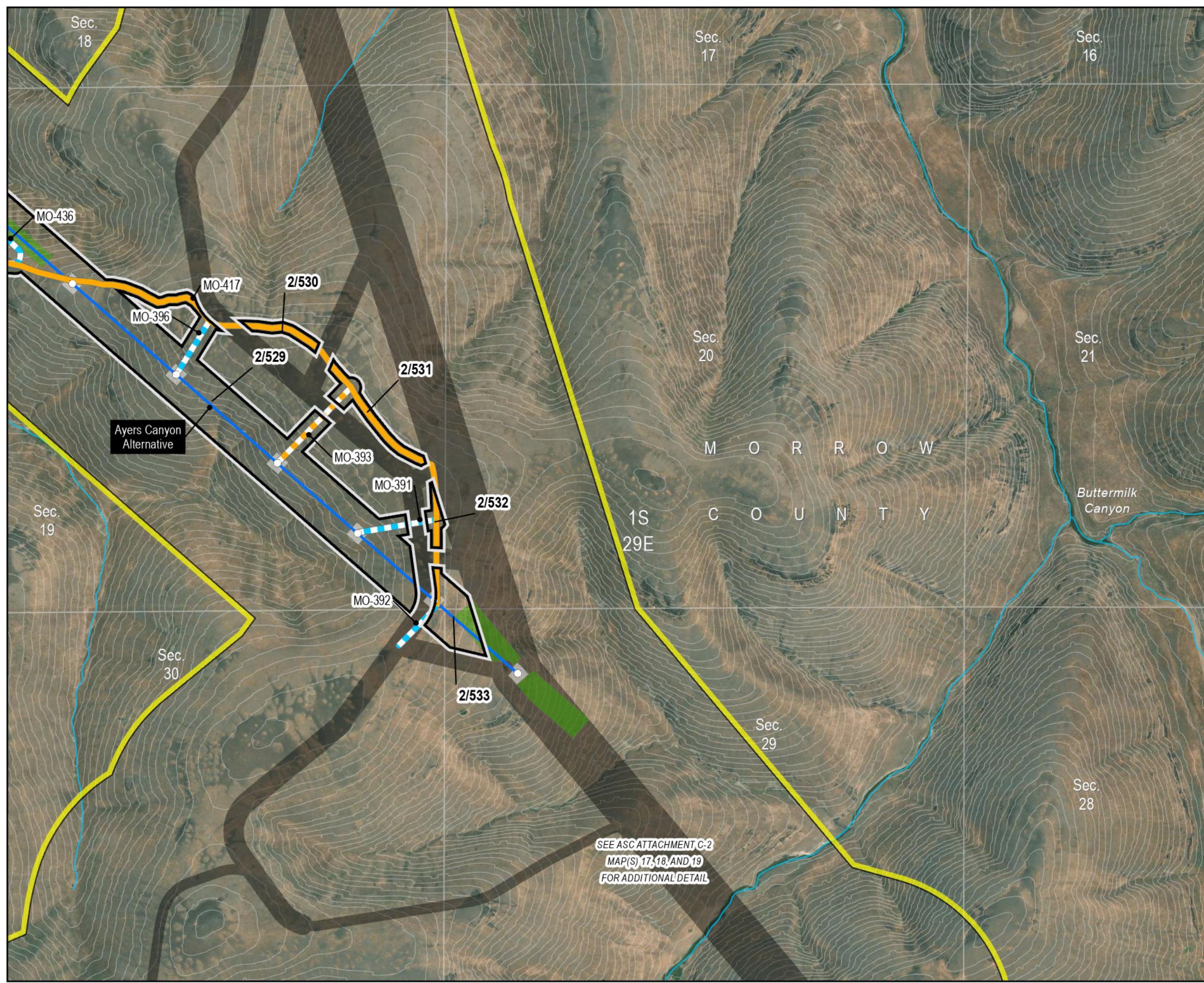
Notes:
Not intended for construction or any uses other than intended purpose.

Project features current as of December 5, 2023.

Data Source(s):
BLM, Esri, FAA, NPS, ODFW, ODOT, StreamNet, USGS, Velocity, Vertyx

Imagery:
World Imagery: Maxar





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
**RFA2 Proposed Micrositing
Area Additions**

Morrow County

Map 12

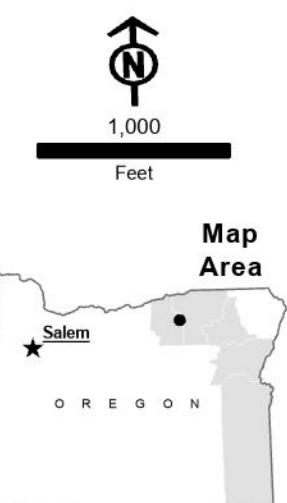
Project Features	Important Siting Constraints and Other Features
Proposed Site Boundary	20-ft Contours
Proposed Micrositing Area Addition	Stream
Previously Approved Micrositing Area	Land Status
Towers_RFA2	Private
Access (Unique ID)	
Existing Road, Substantial	
Modification, 21-70% Improvements	
New Road, Bladed	
New Road, Primitive	
Transmission Centerline	
Work Areas	
Pulling and Tensioning	
Structure Work Area	

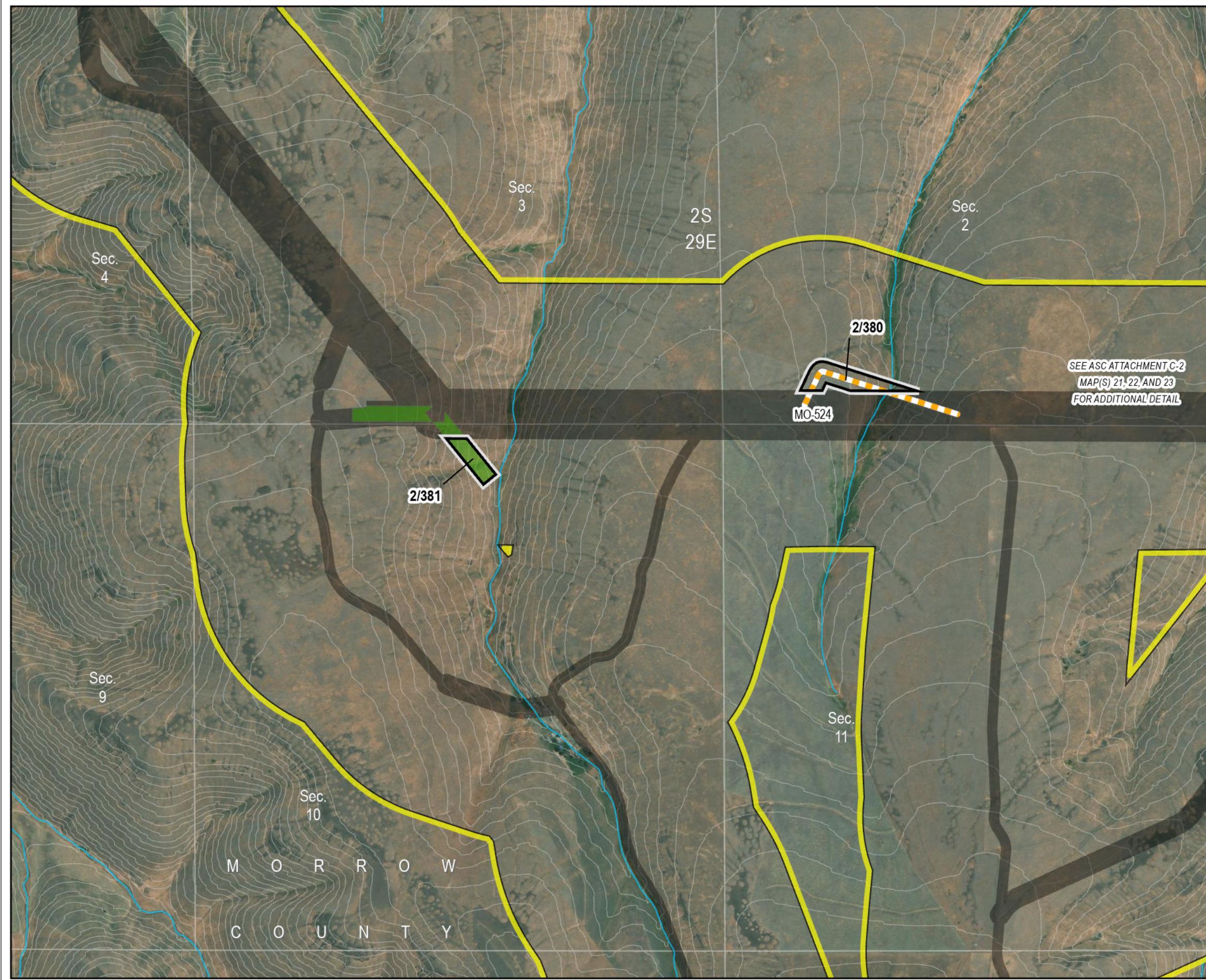
Notes:
Not intended for construction or any uses other than intended purpose.

Project features current as of December 5, 2023.

Data Source(s):
BLM, Esri, FAA, NPS, ODFW, ODOT, StreamNet, USGS, Velocity, Vertyx

Imagery:
World Imagery: Maxar





Boardman to Hemingway
Transmission Project
Request for Amendment 2

Figure 4-1
RFA2 Proposed Micrositing
Area Additions
Morrow County
Map 13

Map 13

res

Project Features	Important Siting Constraints and Other Features
 Proposed Site Boundary	 20-ft Contours
 Proposed Micrositing Area Addition	 Stream
 Previously Approved Micrositing Area	 Land Status
Access (Unique ID)	 Private
 New Road, Primitive	
Work Areas	
 Pulling and Tensioning	

Notes:

Project features current as of December 5, 2023

Data Source(s):

Imagery:

A north arrow icon (a circle with a vertical line and an upward-pointing arrow) and a scale bar indicating 1,000 feet.

Map Area



TARDAEWETHER Kellen * ODOE

From: ODOE ITService * ODOE
Sent: Friday, May 24, 2024 8:43 AM
To: TARDAEWETHER Kellen * ODOE
Subject: New Public Comment submitted for project : B2H Transmission Line Amendment 2 DPO

Organization:

Submitted by: John Milbert

Email: jmfisherman9@gmail.com

Zip Code: 97850

Siting Project Phase: DPO

Comment Summary:

Idaho Power's application to amend the B2H site boundaries is an egregious, unwarranted land grab! The proposed increase would add more than 100,000 acres to the existing boundaries, an increase of more than 400%, making it more than five times as large as is currently approved! This unconscionable action is a prime example of Idaho Power's ongoing policy of deception regarding the proposed transmission line! They recognize the truth only as an obstacle to be overcome! Greed before need!

Please Click on the following link to view the full [Comment Details](#)