

**ADDITION OF ACCESS ROADS UN-461-MOD, UN-461-MOD2, UN-642-MOD,  
UN-536-MOD, AND EXPANSION OF UN-461 WORKSPACE  
AMENDMENT DETERMINATION REQUEST**

**Boardman to Hemingway Transmission Line**

Prepared for:

Oregon Energy Facility Siting Council  
Oregon Department of Energy

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## INTRODUCTION AND REQUEST

Idaho Power Company (the Certificate Holder) is submitting this Amendment Determination Request (ADR) for the Boardman to Hemingway (B2H) Transmission Line (Facility). Construction of the Facility began in June 2025 as approved under the Site Certificate and Second Amended Site Certificate. The Certificate Holder determined the need to submit this ADR to improve access to Facility Structures 117/4 and 117/5 by realigning existing access roads and adding two new spur access roads (Proposed Change One) and reroute Facility Access Road UN-536 to avoid existing guy wires (Proposed Change Two). Additional micrositings corridor is also requested to accommodate portions of the proposed changes outside of the existing Energy Facility Siting Council (EFSC) micrositings corridor. This request is submitted under the requirements of conditions PRE-PS-02(b)(ii)(1) and GEN-GS-007, which mandates an ADR for modifications to existing roads that require substantial modification and coordination with landowners for activities outside of established micrositings corridors. These proposed changes have been reviewed and approved by the Bureau of Land Management through the federal variance process.

Proposed Change One would adjust the alignment of Access Roads UN-461 and UN-642 to allow construction vehicles to safely navigate a sharp turn north of Facility Structure 117/4 and 117/5 by adding Access Road UN-642-MOD and turn radius work space UN-642-MOD2, and retiring 390 feet of Access Road UN-461 and 200 feet of Access Road UN-642 made obsolete by the safer alternative. The proposed change would also add two spur access roads (Access Road UN-461-MOD and Access Road UN-461-MOD2) to provide safer access and workspace for foundation installation around Structure 117/5 where slopes are greater than 30%.

Proposed Change Two would shift Access Road UN-536 to avoid existing guy wires from a non-Facility transmission line, an obstruction not accounted for in the original design. The reroute would add 315 feet of new access road (Access Road UN-536-MOD) and retire a 350-foot portion of Access Road UN-536 that is blocked by the existing guy wires.

The proposed changes to the Facility described in this ADR occur on private land and are entirely within the EFSC Site Boundary. These proposed changes are needed to maintain safe access and avoid physical obstructions for construction vehicles and equipment. This ADR supports continued compliance with EFSC classifications and construction standards, while enhancing operational safety and efficiency.

The Certificate Holder is requesting a written determination under Oregon Administrative Rule (OAR) 345-027-0357(1)(b) for concurrence from the Oregon Department of Energy (ODOE) that the proposed changes (**Section 1.0**) do not require a Site Certificate Amendment because the Facility is being constructed substantially as described in the Second Amended Site Certificate and the proposed changes are within the Site Boundary. The Certificate Holder is providing an amendment determination evaluation (**Section 2.0**) and demonstrates that the proposed changes comply with the requirements of all applicable standards and existing Site Certificate Conditions (**Section 3.0**).

### 1.0 Description of Proposed Changes

This ADR proposes an additional 1,370 ft of access road offset by 940 feet of access road retired from the Facility, for a net addition of 430 feet of Facility access road. Disturbance calculations associated with each of the proposed changes are outlined in **Table 1** and **Table 2**, with associated standards, laws, and Site Certificate evaluations addressed in **Table 3**.

To accommodate proposed changes outside of the existing EFSC micrositing corridor approved in the Second Amended Site Certificate and align with Table 1: Approved Facility Routes, Component, Site Boundary Dimensions and Disturbance Area, the micrositing corridor would be expanded by approximately 1.22 acres (EFSC, 2024).

These proposed changes are justified by the need to avoid physical obstructions and maintain safe access for construction vehicles in the vicinity of upcoming construction areas. The proposed changes support continued compliance with EFSC classifications and construction standards, while enhancing operational safety and efficiency. The proposed changes are located entirely within the EFSC-approved Site Boundary.

### Proposed Change One: Access Roads UN-461-MOD, UN-461-MOD2, UN-642-MOD and Workspace UN-642-MOD2

Proposed Change One is located on private land in the Northwest ¼ of the Northeast ¼ of Section 01, Township 5 South, Range 38 East, approximately 7.0 miles west of City of Union in Union County, Oregon.

Proposed Change One is intended to provide safer access and workspace for construction and operation near Facility Structures 117/4 and 117/5 where steep terrain (30-40% slopes) and existing access routes are inadequate for safe navigation and construction. The addition of Access Road UN-642-MOD and workspace UN-642-MOD2 as an alternate route for portions of Access Roads UN-461 and UN-642 would create a wider turn radius that allows construction vehicles to safely navigate a sharp turn north of Facility Structure 117/4 and 117/5. Portions of Access Road UN-461 and Access Road UN-642 are made obsolete by the safer alternative and would be retired from the Facility.

Proposed Change One would also add two spur access roads (Access Road UN-461-MOD and Access Road UN-461-MOD2) to provide safer access and workspace for foundation installation around Structure 117/5. The proposed access roads would be classified as “New Road, Bladed” which would require cut and fill to create a smooth travel surface and manage stormwater runoff. As outlined in Table 5: Summary of Access Road Classifications in the Second Amended Site Certificate, construction of new bladed roads may include adjustments to the road prism or profile, consistent with EFSC-approved standards, and require a 120-foot construction disturbance width (due to slopes exceeding 30 percent) and a 14-foot operational disturbance width post-construction (EFSC, 2024).

Table 1. Proposed Change One Disturbance Calculations						
Work Area	Length (ft.)	Estimated Disturbance (ac.)				Micrositing Corridor (ac.)
		Existing	Permanent	Temporary	Total	
Removal of UN-461 (Existing Road, Substantial Modification, 21-70% Improvements)	(390)	(-0.35)	(-0.00)	(-0.00)	(-0.35)	
Removal UN-642 (New Road, Bladed)	(200)	(-0.00)	(-0.06)	(-0.49)	(-0.55)	
Addition of UN-461-MOD (New Road, Bladed)	80	+0.00	+0.03	+0.19	+0.22	
Addition of UN-461-MOD2 (New Road, Bladed)	475	+0.00	+0.15	+1.16	+1.31	+0.50
Addition of UN-642-MOD	500	+0.00	+0.16	+1.22	+1.38	+0.46

(New Road, Bladed)						
Expanded workspace UN-642-MOD2				+0.07	+0.07	
<b>Total Change</b>	<b>465</b>	<b>-0.35</b>	<b>+0.28</b>	<b>+2.15</b>	<b>+2.08</b>	<b>+0.96</b>

To accommodate additional micrositing corridor needed to encompass proposed Access Road UN-642-MOD and proposed workspace UN-461-MOD2, the existing EFSC micrositing corridor approved in the Second Amended Site Certificate would be expanded by 0.46-acre and 0.50-acre respectively (Table 1: Approved Facility Routes, Component, Site Boundary Dimensions and Disturbance Area in the Second Amended Site Certificate, EFSC, 2024). All proposed activities would occur within the approved EFSC Facility Site Boundary.

## Geology & Soils

The geology near Clover Creek and Structures 117/4 and 117/5 is mapped as Columbia River Basalt Group (CRBG), specifically weathered Grande Ronde Basalt and Grande Ronde Basalt (Shannon & Wilson, Inc., 2025, p. 15). Subsurface conditions in the vicinity are informed by two geotechnical boring (boreholes BH-J-4/5 and BH-J-4/6) located approximately 700 feet from the area of Proposed Change One.

Geotechnical investigations did not indicate an active landslide hazard near Proposed Change One (Shannon & Wilson, Inc., 2025). However, geotechnical analysis of the surrounding area identifies landslide deposits mapped by the Oregon Department of Geology and Mineral Industries (DOGAMI) in the Statewide Landslide Information Database for Oregon (SLIDO-4-4). Desktop review of LiDAR and aerial imagery also indicates possible landslide deposits and scarps (Shannon & Wilson, Inc., 2025, Appendix C, Fig C1). These features pose a moderate risk to the surrounding area due to shallow landslide characteristics and steep slopes with more than 30 percent gradients according to previous geological surveys (Shannon & Wilson, Inc., 2025, p. 29). Review of SLIDO 4-5 determined the area around Access Road UN-642-MOD and workspace UN-642-MOD2 to have a moderate to high risk of landslide susceptibility and the spurs (Access Road UN-461-MOD and Access Road UN-461-MOD2) to have a high risk of landslide susceptibility. SLIDO 4-5 used data from the Oregon LiDAR Consortium and United States Geological Survey National Elevation Data set to provide a multiprong analysis to a 10-meter resolution to assess landslide susceptibility (DOGAMI, 2024).

Borehole BH-J-4/5 encountered residual soil from the surface to a depth of 1.5 feet below ground surface (bgs), described as *silty gravel with sand and cobbles*. Beneath this layer, from 1.5 to 15.0 feet bgs, the boring encountered CRBG-weathered Grande Ronde Basalt, characterized as extremely weak to weak (Shannon & Wilson, Inc., 2025, p. 15 & Fig A31).

Similarly, borehole BH-J-4/6 encountered residual soil from the surface to 6.5 feet bgs, consisting of *silty gravel with sand, with cobbles and boulders*. Below this, from 6.5 to 9.5 feet bgs, the subsurface consisted of CRBG-Weathered Grande Ronde Basalt, including very weak to medium strong *clayey gravel with sand, with cobbles and boulders*. At greater depth, from 9.5 to 15.4 feet bgs, the material transitioned to medium strong CRBG-Grande Ronde Basalt (Shannon & Wilson, Inc., 2025, p. 15 & Fig A32).

## Plant and Wildlife Habitat

Proposed Change One is located within Shrub-Steppe without Big Sage habitat types located within the Columbia Plateau Scabland Shrubland ecological system. It is designated by Oregon Department of Fish and Wildlife (ODFW) as Category 2 habitat, reflecting its importance as big

game winter range for elk (*Cervus canadensis*) and mule deer (*Odocoileus hemionus*). The site overlaps with ODFW winter ranges for mule deer and elk, restricting ground-disturbing activities between December 1-March 31.

Proposed Change One is located outside of greater-sage grouse (GSG, *Centrocercus urophasianus*) lek buffers identified by ODFW.

Scotch thistle (*Onopordum acanthium*) was found nearby during noxious weed surveys in nearby survey areas (Tetra Tech, 2023b, Map 43). No rare, threatened, endangered, or other special-status plant species were observed during field surveys in nearby survey areas (Tetra Tech, 2023c, Map 43). Additionally, the proposed change area lacks suitable habitat for special-status plant species.

Additional discussion of results and surveys for which no resources were found is in **Section 3.0**.

### Proposed Change Two: UN-536-MOD

Proposed Change Two is located on private land in the Southeast ¼ of the Southwest ¼ of Section 06, Township 6 South, Range 40 East, approximately 3.7 miles Northeast of North Powder in Union County, Oregon.

Proposed Change Two would provide critical construction and operational access to Facility Structures 127/4 and 127/5 by rerouting a portion of Access Road UN-536 to avoid guy wires attached to existing infrastructure and provide passable access for construction equipment. Proposed Access Road UN-536-MOD would be classified as “Existing, Substantial Modification, 21–70 Percent.” This classification applies to existing road prisms that require reconstruction to support safe passage for construction vehicles, including earthwork activities such as cutting, filling, and material placement to adjust the road prism and profile. Access Road UN-536-MOD would have a maximum allowable construction disturbance width of 25 feet (due to 0-15% slopes) and a 14-foot operational disturbance width post-construction as outlined in Table 5: Summary of Access Road Classifications of the Second Amended Site Certificate (EFSC, 2024).

Proposed Change Two also includes retiring 350 feet of Access Road UN-536 (“Existing, Substantial Modification, 21–70 Percent”) which would no longer be necessary due to the proposed alternate route.

Table 2: Proposed Change Two Disturbance Calculations						
Work Area	Length (ft.)	Estimated Disturbance (ac.)				Micrositing Corridor (ac.)
		Existing	Permanent	Temporary	Total	
Removal of Access Road UN-536 (Existing Road, Substantial Modification, 21-70% Improvements)	(350)	(-0.11)	(0.00)	(0.00)	(-0.11)	
Addition of Access Road UN-536-MOD (Existing Road, Substantial Modification, 21-70% Improvements)	315	+0.07	+0.03	+0.08	+0.18	+0.026

Total Change	(-35)	-0.04	+0.03	+0.08	+0.07	+0.26
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To accommodate additional microsites needed to encompass proposed Access Road UN-536-MOD, the existing EFSC microsites approved in the Second Amended Site Certificate would be expanded by 0.26-acre (Table 1: Approved Facility Routes, Component, Site Boundary Dimensions and Disturbance Area in the Second Amended Site Certificate, EFSC, 2024). All proposed activities would occur within the approved EFSC Facility Site Boundary.

## Geology & Soils

The geology near the Midline Cap Bank Station and Structure 127/3, the closest tower to Proposed Change Two, is mapped as Clover Creek Greenstone of the Wallowa Terrane (Shannon & Wilson, Inc., 2025, p. 6). Subsurface conditions in the vicinity are informed by two geotechnical borings (boreholes BH-128/3 and BH-128/4) located approximately 950 feet from the proposed Access Road UN-536-MOD alignment.

No landside features were identified in the vicinity of Proposed Change Two, and the terrain is characterized by little to no slope, supporting stable construction conditions.

Borehole BH-128/3 encountered residual soil from the surface to a depth of 4.0 feet below ground surface (bgs), described as very dense *silty sand with gravel*. Beneath this layer, from 4.0 to 15.4 feet bgs, the boring encountered weathered Clover Creek Greenstone of the Wallowa Terrane, characterized as very weak to weak *silty sand* (Shannon & Wilson, Inc., 2025, pp. 16 & 140).

Similarly, borehole BH-128/4 encountered residual soil from the surface to 7.0 feet bgs, consisting of very dense clayey gravel with sand. Below this, from 7.0 to 18.0 feet bgs, the subsurface consisted of weathered Clover Creek Greenstone, including *silty sand*, *silty gravel with sand*, and *poorly graded gravel with silt and sand*. At greater depth, from 18.0 to 20.3 feet bgs, the material transitioned to medium strong *Greenstone* (Shannon & Wilson, Inc., 2025, pp. 16 & 141).

## Plant and Wildlife Habitat

Proposed Change Two is located within Shrub-Steppe with Big Sage habitat type located within the Inter-Mountain Basins Big Sagebrush Shrubland ecological system. It is designated by ODFW as Category 2 habitat, reflecting its importance as big game winter range for elk and mule deer, and occurs within ODFW winter ranges for elk and mule deer, where ground disturbing activities are restricted between December 1-March 31.

Proposed Change Two is located outside of GSG lek buffers identified by ODFW, however it is within designated GSG breeding seasonal habitat.

No noxious weeds were found during noxious weed surveys in nearby survey areas (Tetra Tech, 2022a, Union County Map 8). No rare, threatened, endangered, or other special-status plant species were observed during field surveys in nearby survey areas (Tetra Tech, 2022b, Union County Map 8). Additionally, the proposed change area lacks suitable habitat for special-status plant species.

Additional discussion of results and surveys for which no resources were found is in **Section 3.0**.

## 2.0 Amendment Determination Evaluation



Pursuant to OAR 345-027-0357(1)(b), the purpose of this ADR is to obtain ODOE determination that the proposed changes do not require a Site Certificate Amendment.

OAR 345-027-0350 identifies changes that would require the Certificate Holder to amend its Site Certificate. Except for exempted changes allowed under OAR 345-027-0353, none of which apply, an amendment to a Site Certificate is required to do the following:

*Design, construct or operate a facility in a manner different from the description in the site certificate, if the proposed change:*

- (a) Could result in a significant adverse impact that the Council has not addressed in an earlier order and the impact affects a resource or interest protected by a Council standard;*
- (b) Could impair the certificate holder's ability to comply with a site certificate condition; or*
- (c) Could require a new condition or a change to a condition in the site certificate*

**Section 3.0** demonstrates that the proposed changes would result in neither significant adverse impact the EFSC has not addressed in an earlier order nor an adverse impact to any resource or interest protected by EFSC standards, as described under OAR 345-027-0050(4)(a).

**Section 3.0** also describes how the proposed changes would not impair the Certificate Holder's ability to comply with any Site Certificate conditions nor require a new condition or change of condition in the Site Certificate.



### 3.0 Additional Information—Standards Evaluation

TABLE 3. STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION			
Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
OAR 345-022-0000 General Standard of Review	<p>The EFSC previously found that the Facility complies with the General Standard of Review. The proposed changes do not affect this finding and comply with the related Site Certificate Conditions. The proposed changes to the existing Facility increase construction disturbance by 2.15 acres and increases the micrositing corridor by 1.22 acres. The Site Boundary would remain unchanged. Coordination and consent of the proposed change occurred with the landowner in November 2025. These proposed changes have been coordinated with the landowners through QISG's Lands Liaison. The landowner is aware of and approves of these changes which are permissible through IPC's easement.</p> <p>The Facility will continue to be designed, constructed, operated, and decommissioned in accordance with the Site Certificate and in compliance with Oregon Revised Statutes Chapter 469, applicable EFSC rules, and all relevant state and local laws, rules, and ordinances. The proposed changes do not alter the Certificate Holder's ability to comply with the Site Certificate conditions.</p>	<p>GEN-GS-01: Commencement and completion of construction            GEN-GS-02: Pre-construction requirements            GEN-GS-03: Compliance during all phases            GEN-GS-04: Notification of environmental impacts            GEN-GS-05: Notification of new owners            GEN-GS-06: Approved transmission line corridors            GEN-GS-07: Evidence of landowner consent            CON-GS-01: Semiannual construction progress report            CON-GS-02: Construction rights            OPR-GS-01: Annual reporting            OPR-GS-02: Site legal description            OPR-GS-03: Vegetation restoration</p>	
OAR 345-022-0010 Organizational Expertise	<p>Proposed Change One was identified as necessary during a field review conducted by construction contractors responsible for access road development in this portion of the Facility. The existing route between Structures 117/4 and 117/5 is constrained by steep slopes and tight turns, creating safety and</p>	<p>GEN-OE-01: Notification of contractors            GEN-OE-02: Responsibility of non-compliance            GEN-OE-03: Report of Site Certificate violations            PRE-OE-01: Notification of construction managers            PRE-OE-02: Construction contractor</p>	

**TABLE 3.  
STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
	<p>maneuverability challenges for heavy equipment. The proposed change addresses these issues by improving access and providing additional workspace to ensure safe foundation installation and steel assembly on difficult terrain.</p> <p>Proposed Change Two was also identified during a field review conducted by the construction contractor. The review determined that the existing alignment of Access Road UN-536 presented safety concerns due to the presence of guy wires, which obstructed the movement of construction vehicles. To address these constraints, the contractor recommended a reroute to improve vehicle maneuverability and create a safer working environment.</p> <p>The proposed changes are practical adjustments based on on-site conditions and construction expertise, and do not alter the Certificate Holder's ability to comply with the conditions of the Site Certificate.</p>	<p>compliance PRE-OE-03: Proof of third-party permits OPR-OE-01: Proof of inspection</p>	
OAR 345-022-0020 Structural Standard	<p>The Certificate Holder has complied with all preconstruction Site Certificate conditions related to the Structural Standard, including those addressing human safety and geologic observations.</p> <p>In the vicinity of Proposed Change One, geotechnical investigations indicate a moderate landslide risk due to shallow landslide deposits within the area, however both proposed changes avoid the mapped</p>	<p>GEN-SS-01: Compliance with building codes GEN-SS-02: Construct to prioritize human safety GEN-SS-03: Notification of foundation differences GEN-SS-04: Notification of geological observations PRE-SS-01: Pre-construction geological reports</p>	

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STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

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	<p>deposit areas (Shannon &amp; Wilson, 2025). It was noted that the slopes did not show signs of instability, but designs should consider the potential for landslide risks. Furthermore, DOGAMI assessed the area as having a moderate to high level of landslide susceptibility with the SLIDO 4-5 dataset. Construction of new roads would avoid cuts greater than 5 feet of material in landslide prone areas, follow incorporated erosion control and drainage practices to divert water runoff and minimize water infiltration, and regular inspections of slope instability or erosion issues (Marron, 2024).</p> <p>In the vicinity of Proposed Change Two, no potential landslide features were identified during geotechnical investigations, and the terrain is characterized by little to no slope, supporting stable construction conditions.</p> <p>The Certificate Holder would continue to design and construct road prisms in accordance with geotechnical recommendations to avoid risks to human safety and the environment. The proposed changes do not alter the Certificate Holder's ability to comply with Site Certificate conditions, nor does it affect the basis for the EFSC's previous findings that the Structural Standard is satisfied.</p>		
OAR 345-022-0022 Soil Protection	Proposed Change One would result in a net increase of approximately 2.08 acres of ground disturbance within the previously approved Facility Site Boundary. Cuts greater than 5 feet of material would be avoided in	GEN-SP-01: General Construction Permit and ESCP submission and compliance GEN-SP-02: HWMSRP submission and compliance GEN-SP-03: SPCC Plan submission and	

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Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
	<p>landslide prone areas, follow incorporated erosion control and drainage practices to divert water runoff and minimize water infiltration, and regular inspections of slope instability or erosion issues would be conducted (Marron, 2024).</p> <p>Proposed Change Two would result in a net increase of approximately 0.07 acre of ground disturbance within the previously approved Facility Site Boundary. Although the terrain is generally flat with little to no slope, erosion and sediment control best management practices (BMPs) would also be implemented and adjusted as needed to ensure effective stormwater management and minimize sediment delivery from disturbed areas.</p> <p>Topsoil within the work areas would be preserved and reused during site restoration. All ground-disturbing activities will comply with the approved Erosion and Sediment Control Plan (ESCP), Hazardous Waste Management and Spill Response Plan (HWMSRP), and Spill Prevention Control and Countermeasures Plan (SPCC). No blasting will be required for this work.</p> <p>The proposed change does not alter the Certificate Holder's ability to comply with Site Certificate conditions, nor does it affect the basis for the EFSC's previous findings that the Soil Protection Standard is satisfied.</p>	<p>compliance GEN-SP-04: Blasting Plan finalization OPR-SP-01: Soil erosion impacts inspections</p>	
OAR 345-022-0030 Land Use	The proposed changes would not result in	<p>GEN-LU-05: Union County permitting GEN-LU-06: Union County setback distances</p>	

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STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
	<p>significant land use impacts not previously evaluated by the EFSC. <b>Tables 1 and 2</b> show the net changes in permanent and temporary disturbance associated with the additions of roads and workspaces, offset by retirement of portions of road that would no longer be needed. The proposed changes result in a net increase of 2.15 acres of disturbance associated with construction and use of access roads and workspaces. All work would occur within the Facility Site Boundary.</p> <p>The proposed changes are located on private land zoned Exclusive Farm Use (EFU, A-1) under Union County's zoning ordinance. Utility facilities necessary for public service, including associated access roads, are allowed as conditional uses in the EFU zone pursuant to ORS 215.275 and Union County Code §155.044(B)(11). To qualify, the facility must demonstrate locational dependency and technical necessity and serve public health and safety. The proposed modification supports a transmission tower that is part of an approved utility facility, improving safe access to Facility structures. Because the proposed changes are integral to the construction and operation of this Facility, it is considered part of the utility infrastructure and is eligible for approval under EFU provisions.</p> <p>Pursuant to Site Certificate conditions, the proposed changes would comply with all applicable Union County permitting requirements, including those related to</p>	<p>GEN-LU-10: City of North Powder setback distances  GEN-LU-11: Agricultural Mitigation Plan  GEN-LU-12: Transmission line ROW in Goal 4 forest lands  GEN-LU-13: ROW Clearing Assessment</p> <p><b>Not Applicable:</b>  GEN-LU-01: Morrow County permitting  GEN-LU-02: Morrow County setback distances  GEN-LU-03: Umatilla County permitting  GEN-LU-04: Umatilla County setback distances  GEN-LU-07: Baker County permitting  GEN-LU-08: Malheur County permitting  GEN-LU-09: Malheur County setback distances  PRE-LU-01: Umatilla County road construction  PRE-LU-02: Baker County aggregate suppliers  CON-LU-01: Baker County setback distances  CON-LU-02: Morgan Lake notification</p>	

**TABLE 3.  
STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
	aggregate sourcing and setbacks. Therefore, the proposed changes do not alter the basis for EFSC's earlier findings that the Land Use Standard is satisfied, nor does it affect the Certificate Holder's ability to comply with Site Certificate conditions.		
OAR 345-022-0040 Protected Area	The proposed changes are within the existing analysis area for the Protected Areas Standard. The nearest protected areas are Morgan Lake and Ladd Marsh Wildlife Area. Proposed Change One is approximately 11.5 miles southeast of Morgan Lake and 6.5 miles southeast of Ladd Marsh Wildlife Area. Proposed Change Two is approximately 21 miles southeast of Morgan Lake and 15 miles southeast of Ladd Marsh Wildlife Area. The proposed changes would have no impact to these areas and are within the Site Boundary. Therefore, the proposed changes do not alter the basis for EFSC's earlier findings that the Protected Areas Standard is satisfied.	GEN-PA-01: Wildlife agency coordination  <b>Not Applicable:</b> GEN-PA-02: Ladd Marsh Wildlife Area avoidance	
OAR 345-022-0050 Retirement and Financial Assurance	The proposed changes do not alter the Certificate Holder's ability to restore the site to a useful, non-hazardous condition following the completion of construction.  The proposed changes would add 0.31 acre of permanent disturbance associated with a net addition of 430 feet of Facility access roads. Changes to the retirement costs would be tracked and reported in the Facility annual/semi-annual report.  The Certificate Holder has a reasonable likelihood of maintaining the financial assurance	GEN-RT-01: Prevention of non-restorable site PRE-RT-01: Pre-construction letter of credit naming State as payee OPR-RT-01: In-service letter of credit naming State as payee RET-RT-01: Retirement plan compliance RET-RT-02: Retirement of facility upon cessation of activities	

**TABLE 3.  
STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
	mechanisms required by the Site Certificate, including a bond or letter of credit sufficient to cover site restoration. The proposed change does not affect the EFSC's earlier findings that the Retirement and Financial Assurance Standard is satisfied, nor does it alter the Certificate Holder's ability to comply with Site Certificate conditions.		
OAR 345-022-0060 Fish and Wildlife Habitat	<p>No raptor nests were identified within 1 mile of the proposed change during 2025 raptor nest surveys, which included the entire proposed change area (Eocene Environmental Group, 2025a). Aerial raptor nest surveys will be conducted each year during the breeding season to identify occupied nests requiring protection within 1 mile of the Facility. Agency guidelines for raptor protection would be followed, which include spatial and temporal nest avoidance. During the breeding season, protocol ground surveys for raptor and non-raptor migratory bird nests will also occur within 7 days prior to ground disturbance at construction locations.</p> <p>The proposed change is outside of the historic range of pygmy rabbits (<i>Sylvilagus idahoensis</i>) and therefore does not require survey (Tetra Tech 2022c).</p> <p>The proposed changes are located in Oregon Department of Fish and Wildlife's (ODFW) mule deer (<i>Odocoileus hemionus</i>) and elk (<i>Cervus canadensis</i>) winter range which restrict ground-disturbing activities between December 1-March 31.</p>	<p>GEN-FW-01: Category 2 Native Grasslands Reclamation, Revegetation, and Monitoring Plan</p> <p>GEN-FW-02: Vegetation Management Plan compliance</p> <p>GEN-FW-03: Noxious Weed Plan finalization</p> <p>GEN-FW-04: Fish and Wildlife Habitat Mitigation Plan finalization</p> <p>GEN-FW-05: Construction personnel training</p> <p>GEN-FW-06: Environmentally sensitive area flagging and mapping</p> <p>GEN-FW-07: Private facility access road speed limit</p> <p>GEN-FW-08: Avian Protection Plan compliance</p> <p>PRE-FW-01: Biological surveys on unsurveyed land</p> <p>PRE-FW-02: Biological surveys</p> <p>PRE-FW-03: Sage-Grouse Habitat Mitigation Plan finalization</p> <p>PRE-FW-04: Elk and sage-grouse habitat traffic study (pre- construction)</p> <p>CON-FW-01: Elk or mule deer winter range</p> <p>CON-FW-03: Migratory bird nesting season surveys</p> <p>CON-FW-05: Sage-Grouse Habitat Mitigation Plan compliance</p>	



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STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
	<p>Both proposed changes are outside of GSG lek buffer areas identified by ODFW. However, Proposed Change Two is located within GSG breeding seasonal habitat.</p> <p>Scotch thistle (<i>Onopordum acanthium</i>) was identified near the area of Proposed Change One during noxious weed surveys conducted in 2023 (Tetra Tech, 2023b, Map 43). No noxious weeds were identified near the area of Proposed Change Two during 2022 noxious weed surveys (Tetra Tech, 2022a, Union County Map 8). A weed wash station will be located on Access Road UN-462 (approximately 0.8 miles south) to mitigate the spread of noxious weeds in addition to mitigation procedures established by the Noxious Weed Plan (IPC, 2023). Vegetation surveys shown on the Resource Survey Map in <b>Appendix A</b> indicate areas surveyed for noxious weeds.</p> <p>The proposed changes are located within Category 2 habitat based on inclusion within ODFW winter range for both mule deer and elk. The proposed changes result in 2.15 acres of additional ground disturbance in Category 2 habitat, resulting in an increase of 4.30 acres of compensatory habitat mitigation. The proposed changes are not within habitat designated as a Category 2 Native Grassland by ODFW (IPC, 2025, Appendix A).</p>	<p>CON-FW-06: Sage-grouse areas construction restrictions            OPR-FW-01: Compensatory mitigation calculations report            OPR-FW-02: Access control on roads in elk and sage-grouse habitat            OPR-FW-03: Sage-grouse indirect impact calculation and mitigation            OPR-FW-04: Elk and sage-grouse habitat traffic study (during operation)</p> <p><b>Not Applicable:</b>            CON-FW-02: Pygmy rabbit colony or bat roost observation            CON-FW-04: Raptor nest buffers</p>	

**TABLE 3.  
STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
	<p>Changes to compensatory mitigation related to temporary and permanent habitat disturbance associated with the Proposed change will be tracked and reported in the annual/semi-annual reports for the Project OPR-FW-01 states that “final calculations shall be based on the as-built facility” and a report will be provided to the Department demonstrating that “fish and wildlife habitat mitigation is commensurate with the final compensatory mitigation calculations” during the third year of operations. Additionally, the Certificate Holder currently holds more credit at the habitat mitigation bank than is required by project impacts including this proposed change and previous ADRs.</p> <p>The proposed changes would not alter the Certificate Holder’s ability to comply with the Site Certificate conditions. Therefore, the proposed change does not alter the basis for the EFSC’s prior findings that the Fish and Wildlife Standard is satisfied.</p>		
OAR 345-022-0070 Threatened and Endangered Species	<p>The proposed changes are located outside the range of Washington ground squirrel (<i>Uroditellus washingtoni</i>, WAGS), and therefore no surveys are required (Tetra Tech, 2023a).</p> <p>A special-status plant species survey was conducted in the vicinity and in portions of the footprint of proposed change areas. No rare, threatened, endangered, or other special-status plants (SSP) including Oregon Department of Agriculture Threatened or</p>	<p><b>Not Applicable:</b> CON-TE-01: WAGS habitat restrictions CON-TE-02: Threatened or endangered plant species buffer</p>	

**TABLE 3.  
STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
	<p>Endangered (T&amp;E) plants were observed in the vicinity of the proposed changes (Tetra Tech, 2022b, Union County Map 8) (Tetra Tech, 2023c, Map 43).</p> <p>A portion of the proposed changes were not included in the 2022 and 2023 surveys for special-status plant species. The unsurveyed areas do not provide suitable habitat for any T&amp;E plant species listed by the U.S. Fish and Wildlife Service or the Oregon Department of Agriculture (ODA). Within Union County, the only documented T&amp;E plant species are Howell's spectacular thelypody (<i>Thelypodium howellii</i> ssp. <i>spectabilis</i>) and Oregon semaphore grass (<i>Pleurogon oregonus</i>) (ODA, n.d.). Both species occur exclusively in wetland habitats. Neither of the proposed changes are located within a delineated wetland area, and the surrounding landscape lacks hydrologic conditions necessary to support these species. Based on the absence of suitable habitat and prior survey results, additional surveys are not warranted.</p> <p>The proposed changes will not affect EFSC's earlier findings that the Threatened and Endangered Species Standard is satisfied nor alter the Certificate Holder's ability to comply with the Site Certificate conditions.</p>		
OAR 345-022-0080 Scenic Resources	The proposed changes do not impact any approved tower types or locations approved in the Second Amended Site Certificate and would not alter the basis for the EFSC's earlier	<p>GEN-SR-01: Dull-galvanized steel</p> <p><b>Not Applicable:</b> GEN-SR-02: Ladd Marsh Wildlife Management Area modifications</p>	

**TABLE 3.  
STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
	findings that the Scenic Resources Standard is satisfied.	GEN-SR-03: National Historic Oregon Trail Interpretive Center modifications GEN-SR-04: Birch Creek Area modifications	
OAR 345-022-0090 Historic, Cultural, and Archaeological Resources	<p>The Certificate Holder's cultural consultant conducted cultural surveys in 2016, 2022 and 2023 that fully evaluated all proposed change work areas for the occurrence of cultural resources (Eocene Environmental Group, 2024b, Appendix A, Map 34; Eocene Environmental Group 2025, Appendix A, Map 68 and 73). No previously documented cultural resources were found. Cultural survey areas are indicated on the Resource Map in <b>Appendix A</b>. The Bureau of Land Management requires a cultural resource monitor to be present for clearing and grading of all new bladed access roads.</p> <p>The proposed changes would not alter the Certificate Holder's ability to comply with the Site Certificate conditions and does not alter the basis for the EFSC's earlier findings that the Historic, Cultural, and Archaeological Resources Standard is satisfied.</p>	<p>GEN-HC-02: Historic Properties Management Plan</p> <p><b>Not Applicable:</b> GEN-HC-01: Trail resource avoidance OPS-HC-01: Cultural Resources Technical Report</p>	
OAR 345-022-0100 Recreation	The proposed changes do not impact any approved tower types or locations approved in the Second Amended Site Certificate and would not alter the basis for the Council's earlier findings that the Recreation Standard is satisfied.	<p><b>Not Applicable:</b> GEN-RC-01: Morgan Lake construction criteria</p>	
OAR 345-022-0110 Public Services	The proposed changes are within the existing analysis area for Public Services. There would be no alteration in limiting public services due to the proposed changes. The proposed changes do not alter the basis for the EFSC's earlier	<p>GEN-PS-01: Helicopter Use Plan submission GEN-PS-02: Fire Prevention and Suppression Plan submission GEN-PS-03: DELETED PRE-PS-02: Traffic impacts and transportation</p>	

**TABLE 3.  
STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
	findings that the Public Services Standard is satisfied, nor alter the Certificate Holder's ability to comply with the Site Certificate conditions.	coordination PRE-PS-03: FAA and ODA hazard determinations PRE-PS-04: Environmental and Safety Training Plan submission  <b>Not Applicable:</b> PRE-PS-01: Owyhee Irrigation District consultation and mitigation	
OAR 345-022-0115 Wildfire Prevention and Risk Mitigation	The Certificate Holder updated the Fire Prevention and Suppression Plan in April 2025 to include a Wildfire Mitigation Plan as Attachment D. The proposed changes do not alter the basis for the EFSC's earlier findings that the Wildfire Prevention and Risk Mitigation Standard is satisfied, nor alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-PS-02: Fire Prevention and Suppression Plan submission GEN-PS-03: DELETED GEN-WMP-01: Wildfire Mitigation Plan (WMP) OPR-WMP-01: Annual WMP report submittal	
OAR 345-022-0120 Waste Minimization	The Certificate Holder's Construction Waste Management plan applies to both the Certificate Holder and contractor(s) associated with this proposed change. The proposed changes do not alter the basis for the EFSC's earlier findings that the Waste Minimization Standard is satisfied, nor alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-WM-01: Construction Waste Management Plan submission	
OAR 345-024-0090 Siting Standards for Transmission Lines	The proposed changes do not affect the basis for the EFSC's prior findings that the Siting Standards for Transmission Lines are satisfied and would not alter the Certificate Holder's ability to comply with the conditions of the Site Certificate.	PRE-TL-01: Pre-construction Public Utility Commission briefing GEN-TL-02: National Electric Safety Code compliance OPR-TL-01: Shock risk reduction OPR-TL-02: Annual Public Utility Commission safety updates	

**TABLE 3.  
STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
		<b>Not Applicable:</b> GEN-TL-01: Reducing human exposure to electromagnetic fields	
OAR 635-412-0035 Fish Passage	The area of the proposed changes do not contain current or historic fish-bearing streams. No crossings of any waters are proposed. The proposed changes would not affect the basis for the EFSC's prior findings that the Fish Passage Standard is satisfied and does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	<b>Not Applicable:</b> GEN-FP-01: Fish Passage Plan finalization	
OAR 340-035-0035 Noise Control Regulations	The proposed changes would not result in any exceedance of Oregon Department of Environmental Quality (DEQ) noise control standards. No noise-sensitive receptors (NSRs)—landowners identified within one mile the proposed changes- were identified in the vicinity of the proposed changes. Pursuant to OAR 340-035-0035(5)(c) and (g), sounds originating from construction activities and those generated by tires or motors used to propel road vehicles are expressly exempt from regulation under Oregon DEQ's noise control rules. As such, the temporary construction noise associated with the proposed changes are not subject to enforcement under this rule. The proposed changes do not affect the EFSC's earlier findings that the Noise Control Regulations Standard is satisfied, nor does it alter the Certificate Holder's ability to comply with Site Certificate conditions.	GEN-NC-01: Site-specific Noise Exceedance Mitigation Plans GEN-NC-02: Attachment X-7 update and notification GEN-NC-03: Corona noise minimization OPR-NC-01: Foul weather ambient antidegradation standards exception OPR-NC-02: Foul weather ambient antidegradation standards variation	
ORS 196.795-990 Removal Fill Law	The proposed changes would not impact wetlands or waters of the state and/or United States. No wetlands or waters would be	PRE-RF-01: Wetland delineation reports submission PRE-RF-02: JPA update	

**TABLE 3.  
STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION**

Standard	Evaluation	Related Site Certificate Conditions	ODOE Evaluation
	<p>crossed by proposed access roads, and proposed work areas do not overlap mapped National Wetlands Inventory or National Hydrography Dataset features, Natural Resources Conservation Service mapped hydric soils, wetland aerial signatures, or stream aerial signatures.</p> <p>The proposed changes would not affect the EFSC's earlier findings that the Removal Fill Law Standard is satisfied and do not alter the Certificate Holder's ability to comply with the Site Certificate conditions.</p>	<p>GEN-RF-01: Site Rehabilitation Plan submission  GEN-RF-02: CWNWMP submission  GEN-RF-03: DELETED With RFA1  GEN-RF-04: Removal-fill permit compliance</p>	



## CONCLUSION

The Certificate Holder provides this ADR to demonstrate that the proposed changes do not fall under factors outlined in OAR 345-027-0350 that would require an amendment to the Site Certificate. The proposed changes are located entirely within the existing Site Boundary and would not impair the Certificate Holder's ability to comply with the Site Certificate conditions or create the need for other conditions. Therefore, the Certificate Holder requests that ODOE provide a written determination that no amendment to the Site Certificate is required for the proposed changes.

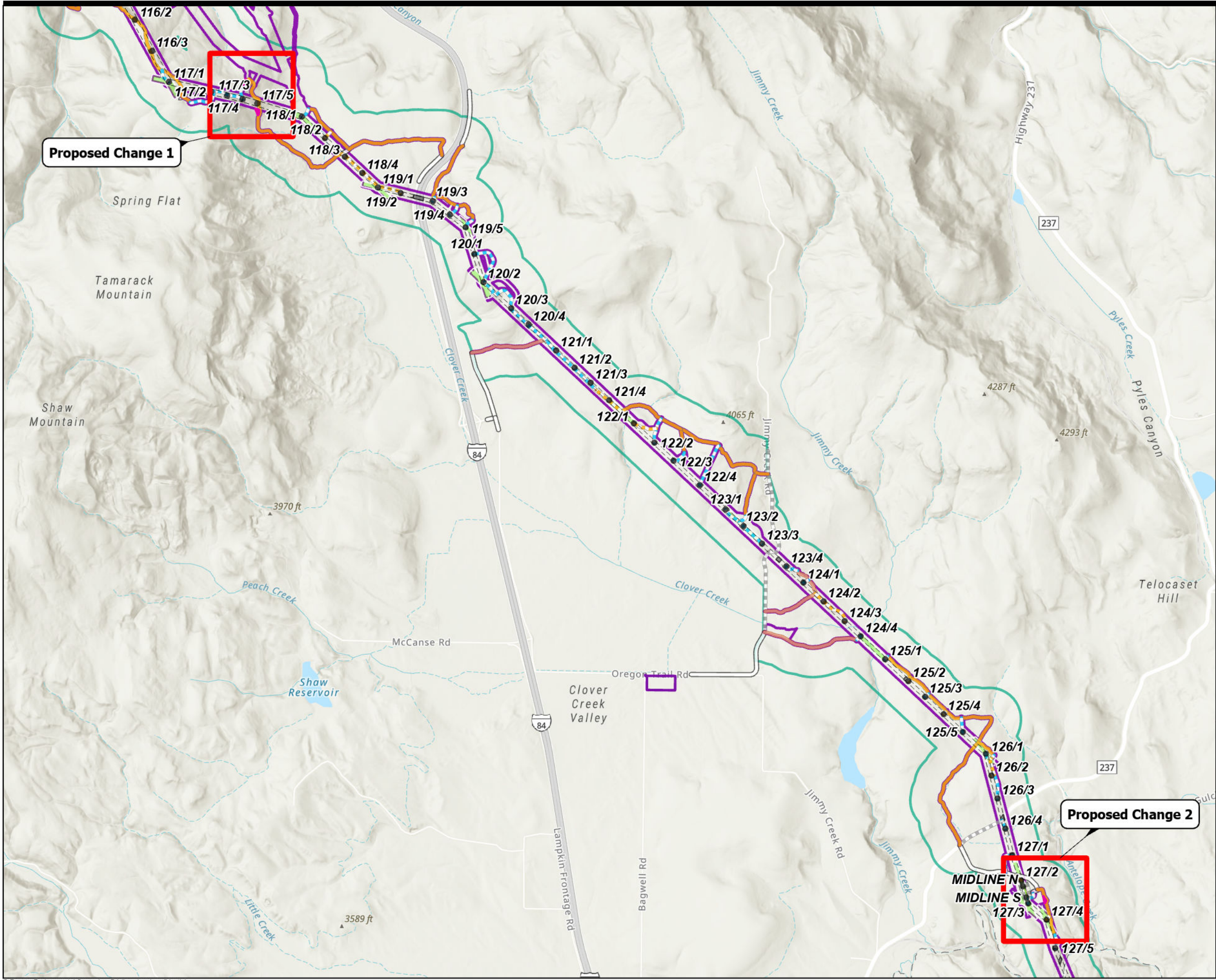
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- Tetra Tech. (2023b, August). Boardman to Hemingway Transmission Line Project 2023 Noxious Weed Survey.
- Tetra Tech. (2023c, August). Boardman to Hemingway Transmission Line Project 2023 Special Status Plants Survey.

# APPENDIX A

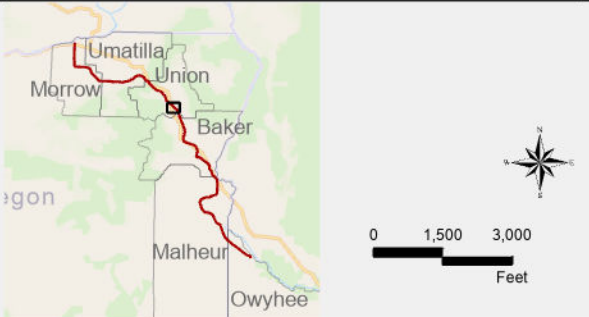
## FACILITY MAPS





**Legend**

- Location of Change
- Facility Features**
  - Structures
  - Right-of-way (ROW)
  - EFSC Micrositing Corridor
  - EFSC Site Boundary
  - Micrositing Corridor Addition (200ft Buffer)
- Access Roads**
  - Existing Road, No Improvements Required
  - Existing Road, No Substantial Modification, 0-20% Improvements
  - Existing Road, Substantial Modification, 21-70% Improvements
  - Existing Road, Substantial Modification, 71-100% Improvements
  - New Road, Bladed
  - New Road, Primitive
- Structural Work Areas**
  - Guard Trucks Disturbance Area
  - Pulling and Tensioning
  - Structure Work Area
  - Midline Cap Bank Station (Operation)
  - Midline Cap Bank Station (Construction)

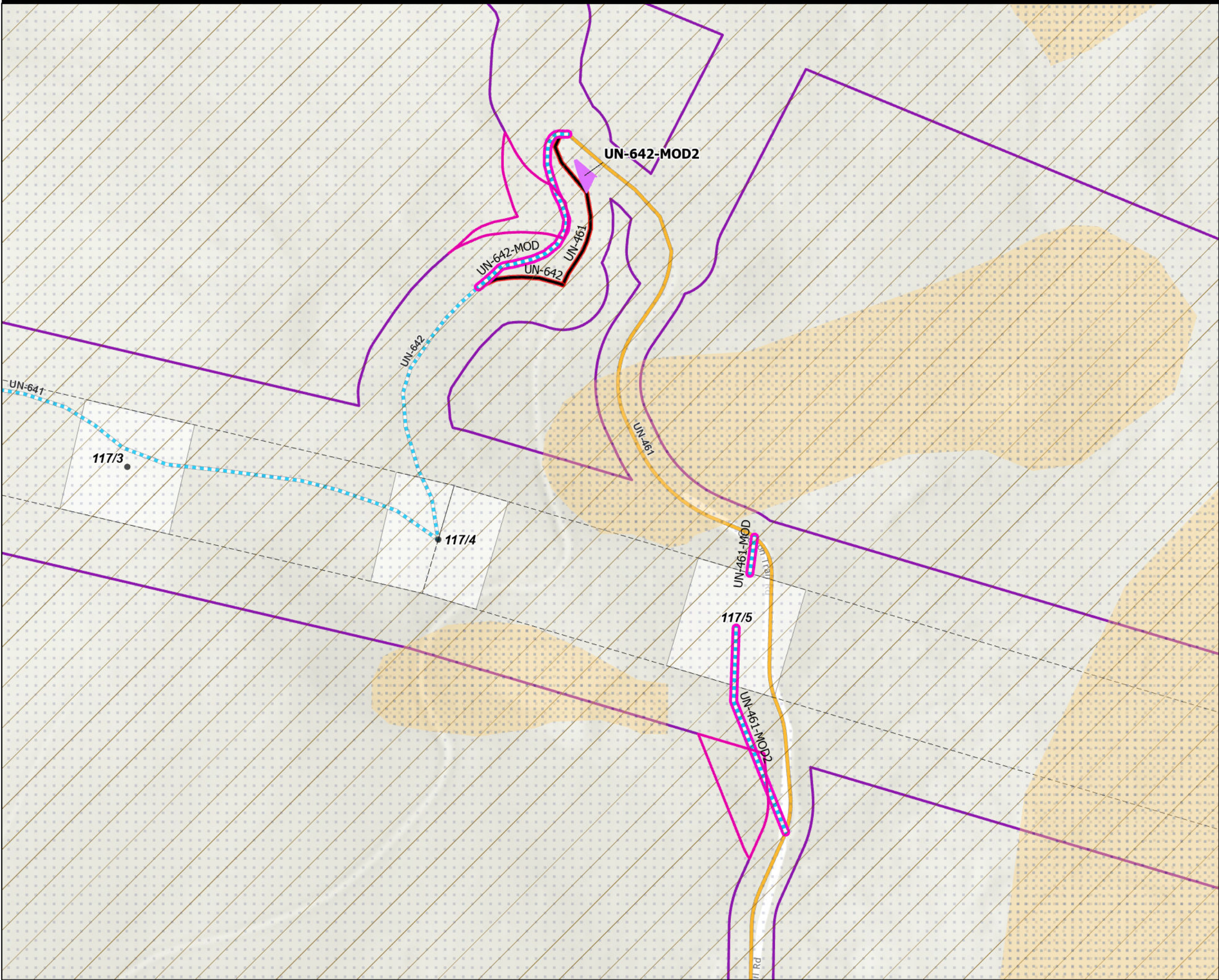


**Figure 1. Facility Overview**  
**Boardman to Hemingway 500kV Transmission Line (B2H)**  
Addition of Access Roads UN-461-MOD, UN-461-MOD2, UN-642-MOD, UN-642-MOD2, UN-536-MOD, and Expansion of UN-461 Workspace Amendment Determination Request

NAD 1983 UTM Zone 11N  
Project Features IFC Rev2d\_20251013  
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**Legend**

**Proposed Change One**

- UN-461 Planned Retirement
- UN-461-MOD Addition
- UN-461-MOD2 Addition
- UN-642 Planned Retirement
- UN-642-MOD Addition

**Facility Features**

- Structures
- Right-of-way (ROW)
- EFSC Micrositing Corridor
- EFSC Site Boundary
- Micrositing Corridor Addition (200ft Buffer)
- UN-642-MOD2 Workspace Addition

**Access Roads**

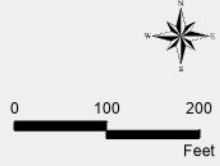
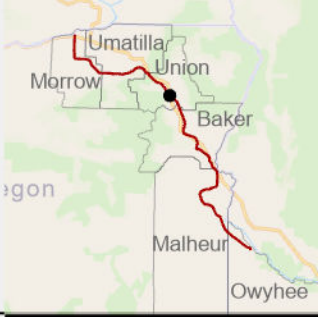
- Existing Road, Substantial Modification, 21-70% Improvements
- New Road, Bladed

**Structural Work Areas**

- Structure Work Area

**Resources**

- Mule Deer Winter Range
- Elk Winter Range
- Landslide Deposits



**Figure 2. Resource Map - Proposed Change One**

**Boardman to Hemingway 500kV Transmission Line (B2H)**

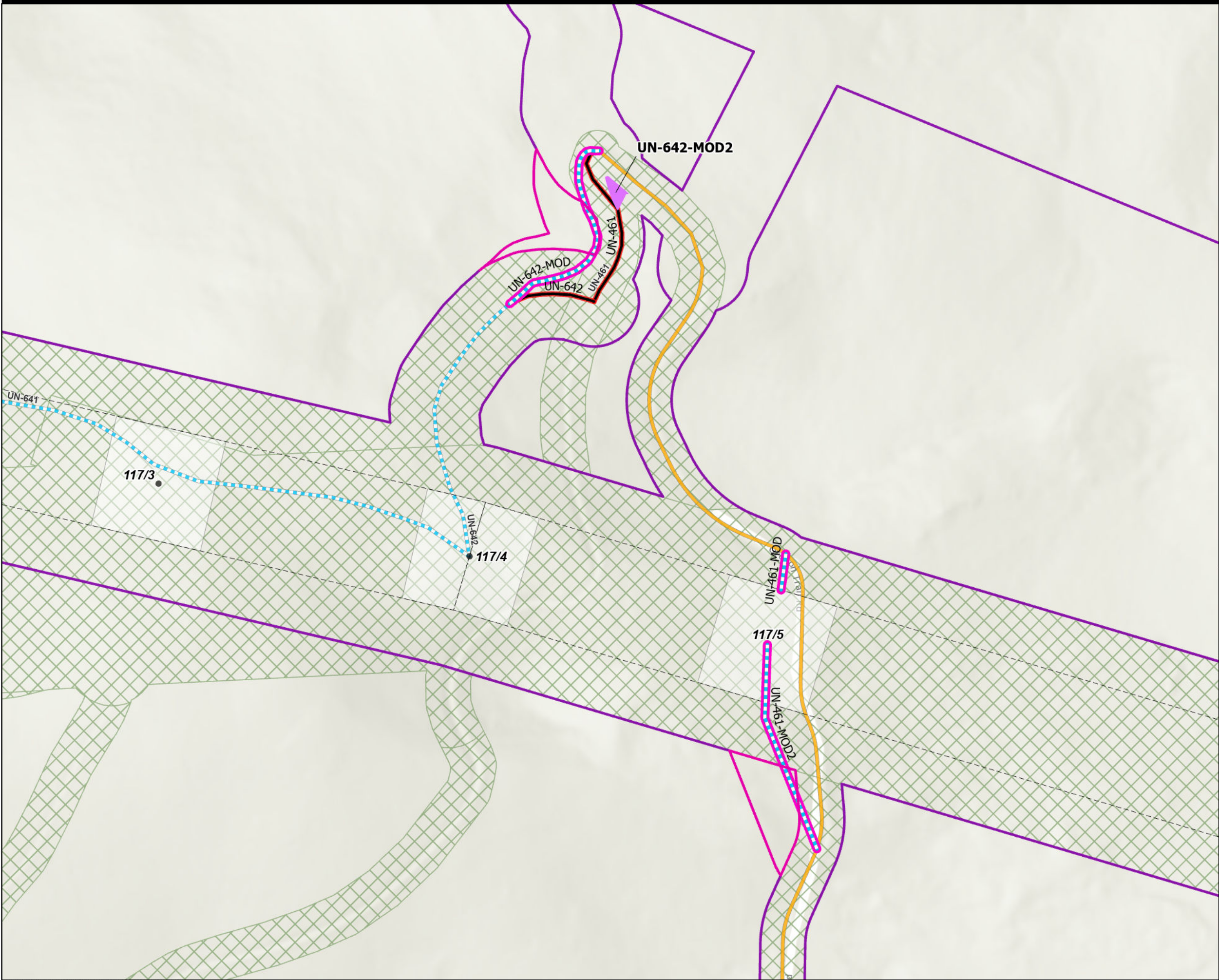
Addition of Access Roads UN-461-MOD, UN-461-MOD2, UN-642-MOD, UN-642-MOD2, UN-536-MOD, and Expansion of UN-461 Workspace  
Amendment Determination Request

\*\*\* Source: Oregon Department of Geology and Mineral Industries, SLIDO 4-5  
NAD 1983 UTM Zone 11N 12/3/2025

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**Legend**

**Proposed Change One**

- UN-461 Planned Retirement
- UN-461-MOD Addition
- UN-461-MOD2 Addition
- UN-642 Planned Retirement
- UN-642-MOD Addition

**Facility Features**

- Structures
- Right-of-way (ROW)
- EFSC Micrositing Corridor
- EFSC Site Boundary
- Micrositing Corridor Addition (200ft Buffer)
- Proposed Disturbance Area (UN-642-MOD2)

**Access Roads**

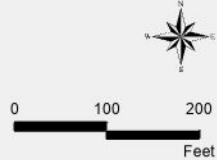
- Existing Road, Substantial Modification, 21-70% Improvements
- New Road, Bladed

**Structural Work Areas**

- Structure Work Area

**Survey Sections**

- Vegetation



**Figure 3. Resource Survey Map - Proposed Change One**  
**Boardman to Hemingway 500kV Transmission Line (B2H)**  
Addition of Access Roads UN-461-MOD, UN-461-MOD2, UN-642-MOD, UN-642-MOD2, UN-536-MOD, and Expansion of UN-461 Workspace  
Amendment Determination Request

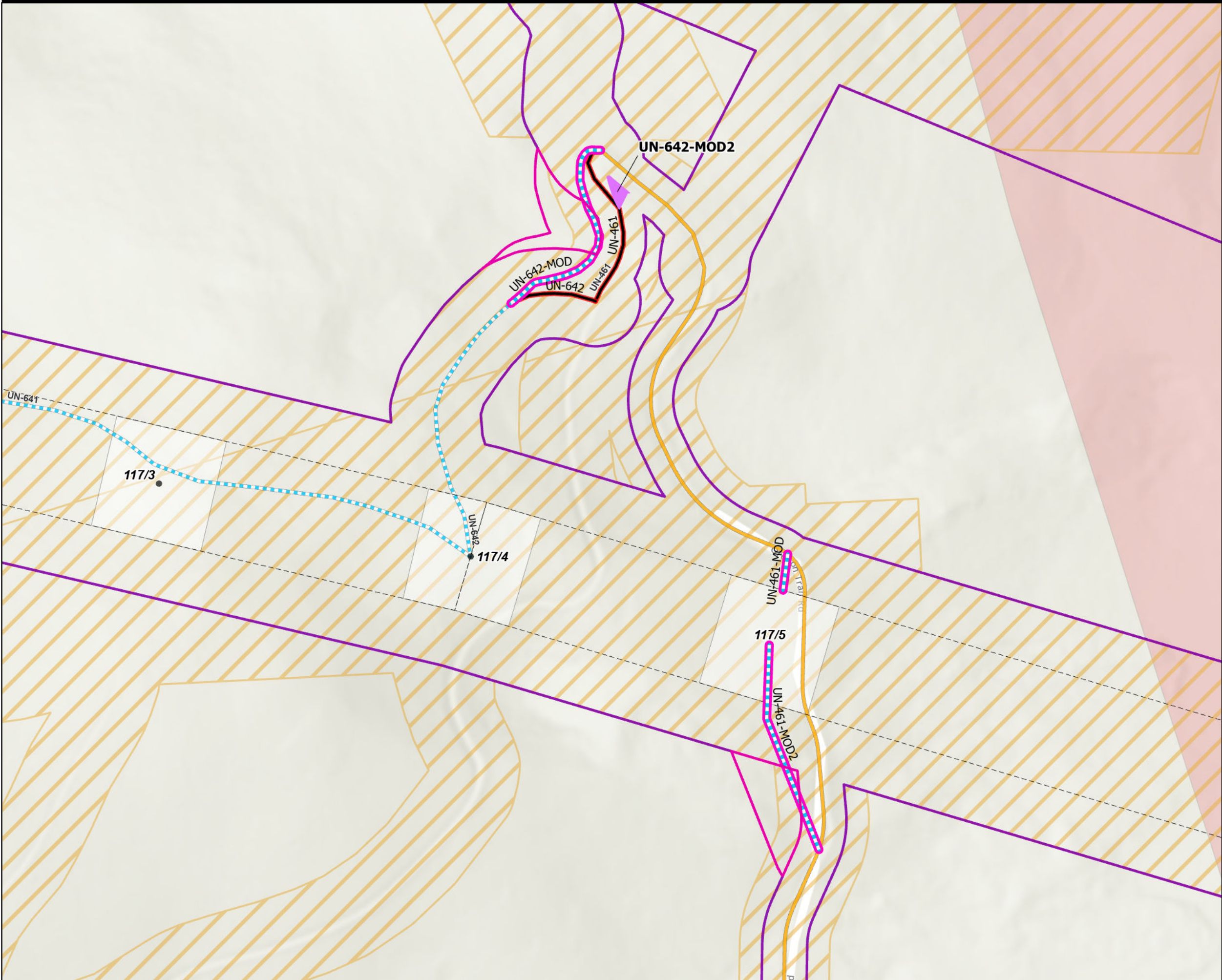
NAD 1983 UTM Zone 11N

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Project Features IFC Rev2d\_20251013







**Legend**

- Cultural Survey
- Cultural Resource Monitoring Area
- Proposed Change One**
  - UN-461 Planned Retirement
  - UN-461-MOD Addition
  - UN-461-MOD2 Addition
  - UN-642 Planned Retirement
  - UN-642-MOD Addition
- Facility Features**
  - Structures
  - Right-of-way (ROW)
  - EFSC Micrositing Corridor
  - EFSC Site Boundary
  - Micrositing Corridor Addition (200ft Buffer)
  - Proposed Disturbance Area (UN-642-MOD2)
- Access Roads**
  - Existing Road, Substantial Modification, 21-70% Improvements
  - New Road, Bladed
- Structural Work Areas**
  - Structure Work Area

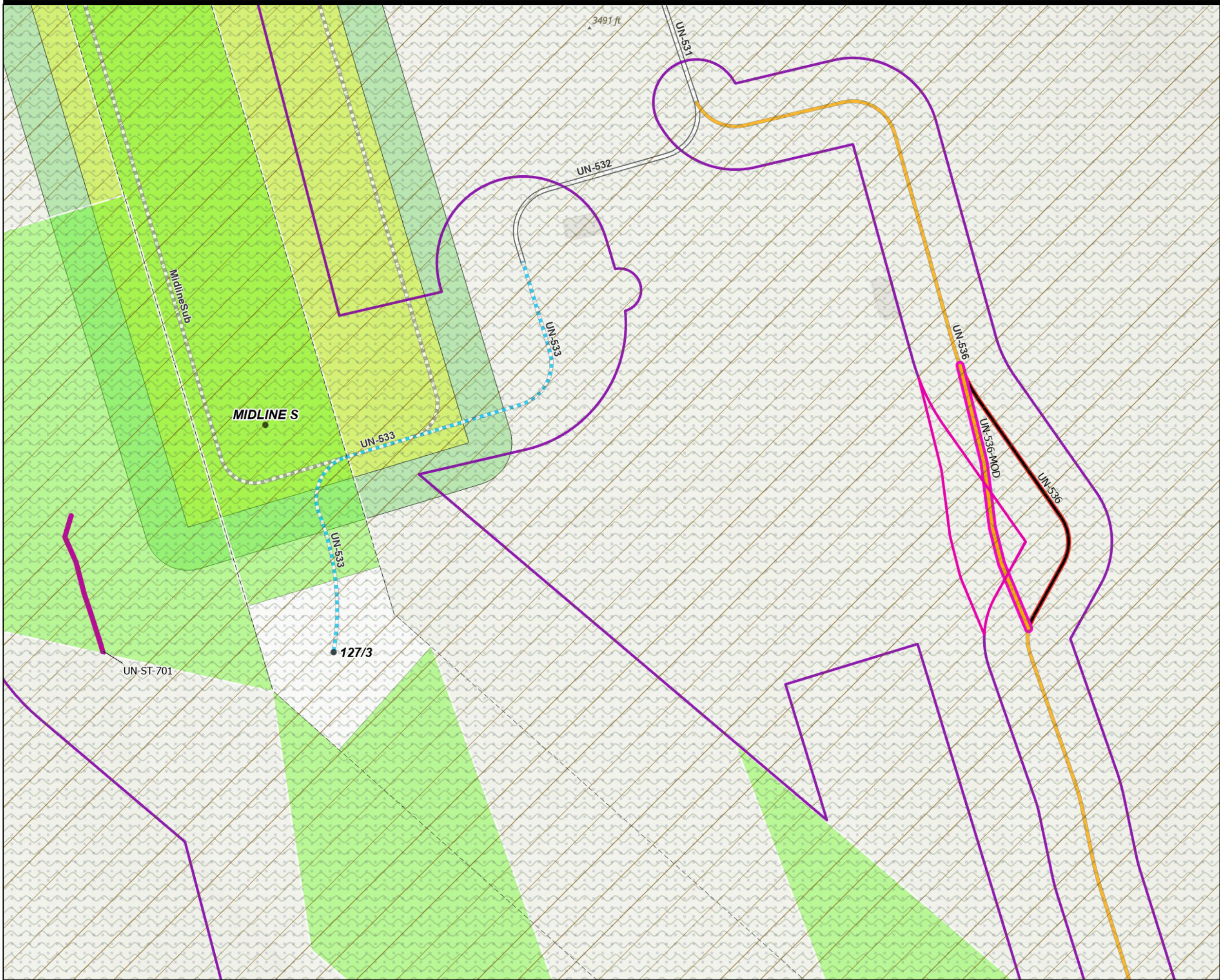


**Figure 4. Cultural Resource Map - Proposed Change One**  
**Boardman to Hemingway 500kV Transmission Line (B2H)**  
Addition of Access Roads UN-461-MOD, UN-461-MOD2, UN-642-MOD, UN-642-MOD2, UN-536-MOD, and Expansion of UN-461 Workspace  
Amendment Determination Request

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**Legend**

**Proposed Change Two**

- UN-536 Planned Retirement
- UN-536-MOD Addition

**Facility Features**

- Structures
- Right-of-way (ROW)
- EFSC Micrositing Corridor
- EFSC Site Boundary
- Micrositing Corridor Addition (100ft Buffer)

**Access Roads**

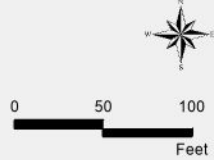
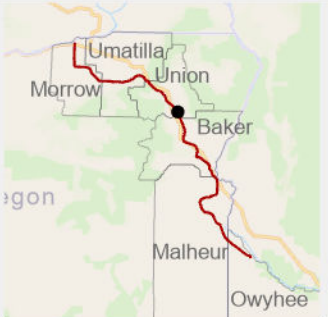
- Existing Road, No Improvements Required
- Existing Road, No Substantial Modification, 0-20% Improvements
- Existing Road, Substantial Modification, 21-70% Improvements
- New Road, Bladed

**Structural Work Areas**

- Pulling and Tensioning
- Structure Work Area
- Midline Cap Bank Station (Operation)
- Midline Cap Bank Station (Construction)

**Resources**

- Mule Deer Winter Range
- Elk Winter Range
- GSG Seasonal Habitat
- Permitted Wetland/Stream Impacts



**Figure 5. Resource Map - Proposed Change Two**  
**Boardman to Hemingway 500kV Transmission Line (B2H)**

UN-536-MOD Addition  
Amendment Determination Request

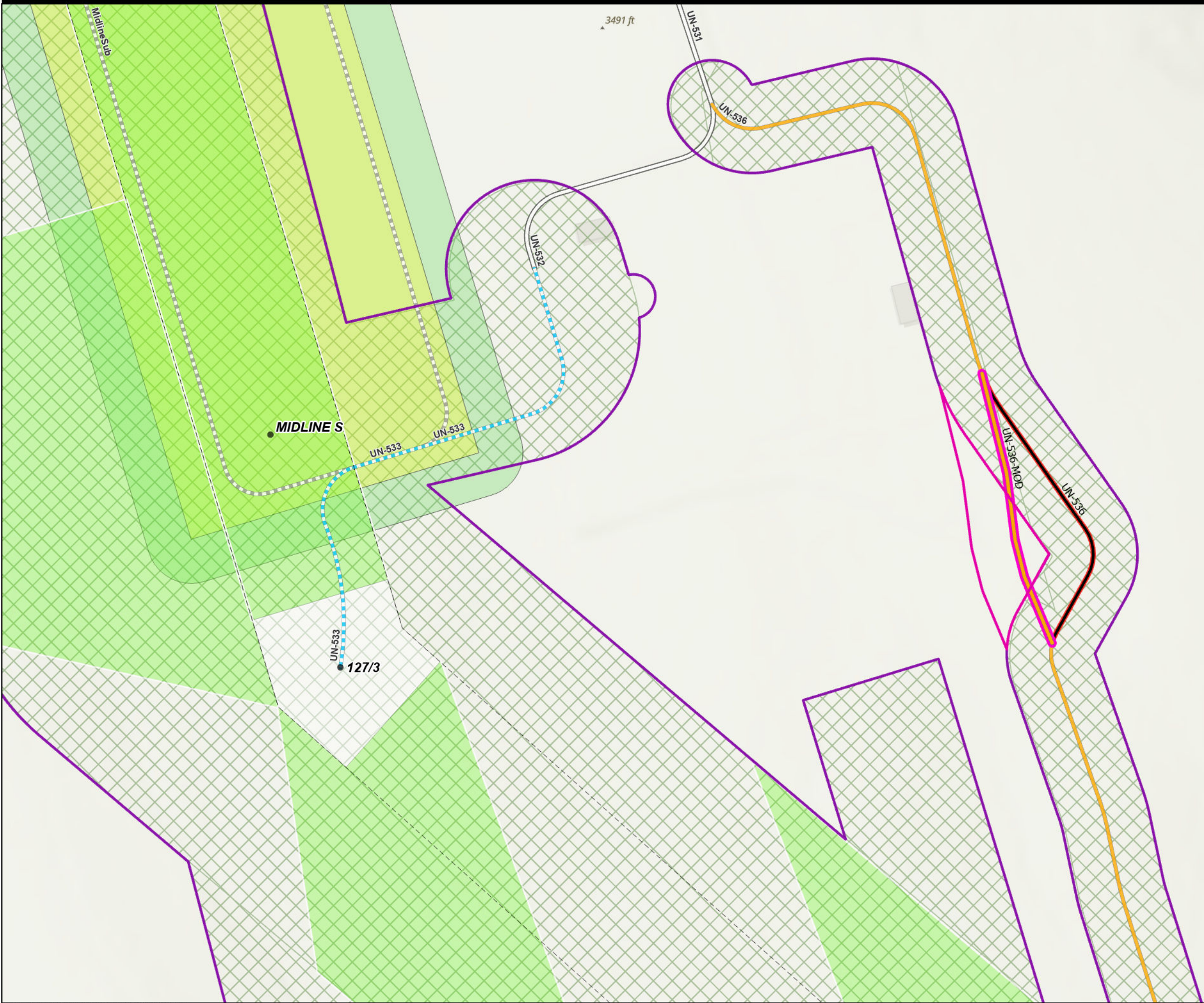
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**Legend**

**Proposed Change Two**

- UN-536 Planned Retirement
- UN-536-MOD Addition

**Facility Features**

- Structures
- Right-of-way (ROW)
- EFSC Micrositing Corridor
- EFSC Site Boundary
- Micrositing Corridor Addition (100ft Buffer)

**Access Roads**

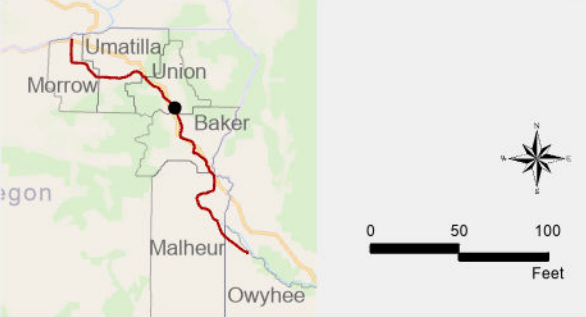
- Existing Road, No Improvements Required
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- Existing Road, Substantial Modification, 21-70% Improvements
- New Road, Bladed

**Structural Work Areas**

- Pulling and Tensioning
- Structure Work Area
- Midline Cap Bank Station (Operation)
- Midline Cap Bank Station (Construction)

**Survey Sections**

- Vegetation



**Figure 6. Resource Survey Map - Proposed Change Two**  
Boardman to Hemingway 500kV Transmission Line (B2H)

UN-536-MOD Addition  
Amendment Determination Request

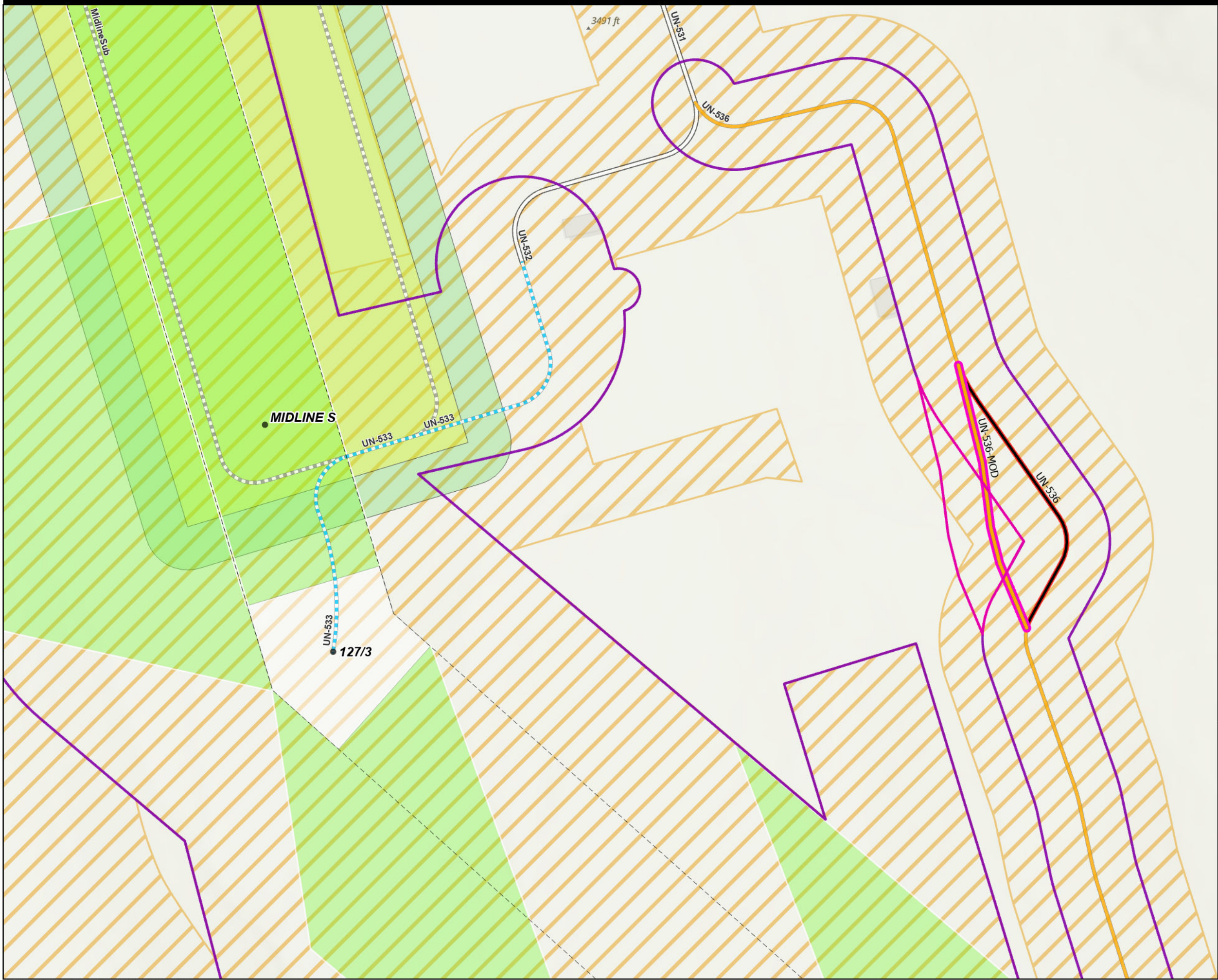
NAD 1983 UTM Zone 11N

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**Legend**

- Cultural Survey
- Proposed Change Two**
  - UN-536 Planned Retirement
  - UN-536-MOD Addition
- Facility Features**
  - Structures
  - Right-of-way (ROW)
  - EFSC Micrositing Corridor
  - EFSC Site Boundary
  - Micrositing Corridor Addition (100ft Buffer)
- Access Roads**
  - Existing Road, No Improvements Required
  - Existing Road, No Substantial Modification, 0-20% Improvements
  - Existing Road, Substantial Modification, 21-70% Improvements
  - New Road, Bladed
- Structural Work Areas**
  - Pulling and Tensioning
  - Structure Work Area
  - Midline Cap Bank Station (Operation)
  - Midline Cap Bank Station (Construction)



**Figure 7. Cultural Resource Map - Proposed Change Two**  
**Boardman to Hemingway 500kV Transmission Line (B2H)**

UN-536-MOD Addition  
Amendment Determination Request

NAD 1983 UTM Zone 11N

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Project Features IFC Rev2d\_20251013

