

AMENDMENT DETERMINATION REQUEST (ADR-B2H-002)
ACCESS ROAD EXPANSION FROM STRUCTURE 181/3 TO 186/4
Boardman to Hemingway Transmission Line

Prepared for:

Oregon Energy Facility Siting Council
Oregon Department of Energy

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Introduction

Idaho Power Company (IPC, 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 expand the construction workspace for fifteen access roads due to safety concerns from steep terrain (Proposed Change). The Proposed Change within this ADR is associated with two variance requests under the Bureau of Land Management (BLM) federal variance process, VAR-009 and VAR-010. BLM approved VAR-010 on November 3, 2025, and VAR-009 approval is anticipated in mid-May 2026.

The Proposed Change described in this ADR (ADR-B2H-002) occurs on private land (Tax Lots 13S44E01500, 13S44E00800, 12S43E05600, 12S43E04800 and 12S43E03000) and lands administered by the BLM (Tax Lots 12S43E03100, 12S44E03000 and 13S44E00700) located within the Facility Site Boundary and the micrositing corridor. This ADR supports continued compliance with Energy Facility Siting Council (Council) classifications and construction standards. This request is submitted under the requirements of conditions PRE-PS-02(b)(ii)(1), which mandates an ADR for modifications to existing roads that require substantial modification. The Proposed Change is needed to create a safer workspace and prevent debris, sediment, and other materials from leaving the defined work area during construction.

This ADR proposes to increase the temporary construction disturbance area for these access roads from 60 feet, the allowable construction disturbance width under the Site Certificate, to 100 feet for all roads except BA-677, which would be increased to up to 120 feet. This Proposed Change would expand the temporary construction disturbance associated with the Facility by 31.14 acres.

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 Change (**Section 1.0**) does 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 is within the Site Boundary. The Certificate Holder is providing an amendment determination evaluation (**Section 2.0**) and demonstrates that the Proposed Changes complies with the requirements of all applicable standards and existing Site Certificate Conditions (**Section 3.0**).

1.0 Description of the Proposed Change

The Proposed Change is located in Sections 25, 26, and 36 of Township 12 South, Range 43 East; Section 31 of Township 12 South, Range 44 East; and Sections 6 and 9 of Township 13 South, Range 44 East, approximately 1.5 miles west of Weatherby in Baker County, Oregon. The Proposed Change is located entirely within the Facility Site Boundary and micrositing corridor.

The Proposed Change would improve the safe construction of access to structures 181/3 through 186/4 by providing additional construction workspace on a total of fifteen access roads that were included in the Second Amended Site Certificate (EFSC 2024). Due to steep terrain in the vicinity, additional construction workspace is needed to reconstruct safe and stable driving surfaces for these roads. The access roads are all classified as *Existing, Substantial Modification, 21-70 %* and *71-100 %*. 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. As outlined in Table 5: Summary of Access Road Classifications in the Second Amended Site Certificate, these access roads have a maximum allowable construction disturbance width of 60 feet (due to slopes exceeding 15 percent) (EFSC, 2024).

The Proposed Change would increase the construction disturbance width of these roads to 100 feet, except for Access Road BA-677, which requires a disturbance width of 120 feet. Access Road BA-677 is located on a particularly steep side slope and has several sharp turns that require additional space for larger equipment to navigate the turns safely. The additional disturbance width for all fifteen roads would be temporary only and would be restored following construction, leaving 14-foot operational road widths within the existing pre-

construction road prisms. The Proposed Change would not alter operational road widths previously approved in the Second Amended Site Certificate.

Increasing the construction disturbance width of these access roads from 60 feet to 100 feet (120 feet for Access Road BA-677) would result in an additional 31.14 acres of temporary disturbance.

Disturbance calculations associated with the Proposed Change are outlined in **Table 1**.

TABLE 1.		
PROPOSED CHANGE DISTURBANCE CALCULATIONS		
Proposed Access Road Workspace Expansion	Additional Temporary Disturbance (Acres)	Additional Permanent Disturbance (Acres)
Workspace BA-475-MOD	2.63	0.00
Workspace BA-477-MOD	4.16	0.00
Workspace BA-480-MOD	0.68	0.00
Workspace BA-481-MOD	0.91	0.00
Workspace BA-485-MOD	2.15	0.00
Workspace BA-487-MOD	3.52	0.00
Workspace BA-487X2-MOD	0.27	0.00
Workspace BA-496-MOD	2.22	0.00
Workspace BA-677-MOD	4.06	0.00
Workspace BA-768-MOD	0.45	0.00
Workspace BA-769-MOD	2.28	0.00
Workspace BA-770-MOD	1.47	0.00
Workspace BA-771-MOD	0.77	0.00
Workspace BA-772-MOD	2.72	0.00
Workspace BA-773-MOD	2.85	0.00
Total Change	31.14	0.00

Geology and Soils

Geotechnical studies occurred at nearby Facility structures and transmission line right-of-way (ROW) in 2024 (Shannon & Wilson, 2024). The Proposed Change occurs within the Weatherby Formation. Subsurface conditions in the vicinity are informed by two geotechnical borings (boreholes BH-180/5 and BH-183/3). Borehole BH-180/5 encountered residual top soil to 1 foot, with weak to medium strong, gray and black, moderately weathered schist to 21.5 feet below ground surface (bgs), and at borehole BH-183/3 the material consisted of extremely weak to weak, moderately weathered sandstone to 4.5 feet bgs with medium strong to strong breccia, which weathers to silty sand with gravel and clayey gravel with sand to 41.5 feet bgs (Shannon & Wilson, 2024, Figures A67-A68).

Geotechnical investigations did not indicate an active landslide hazard near the Proposed Change (Shannon & Wilson, 2024, Fig. C1 Sheets 23-25). The terrain in the vicinity of the Proposed Change consists of rolling to steep hills and steep slopes exceeding 15 percent.

Topsoil within the work areas would be stockpiled for application during site restoration. Erosion and sediment control best management practices would be increased as needed through areas of rugged terrain to ensure adequate stormwater runoff management and reduce sediment delivery from the work areas.

Plant and Wildlife Habitat

The Proposed Change is located within a variety of distinct habitat types as defined by the Oregon Department of Fish and Wildlife (ODFW):

- Construction of Workspaces BA-496-MOD (partial) and Workspace BA-677-MOD would result in 5.33 acres of disturbance in Category 2 Native Grasslands habitat (Columbia Basin Foothill and Canyon Dry Grassland ecological system).
- Construction of Workspaces BA-475-MOD, BA-477-MOD (partial), and BA-481-MOD (partial) would result in 6.36 acres of disturbance in Category 2 Western Juniper/Mountain Mahogany Woodland habitat (Columbia Plateau Western Juniper Woodland and Savanna ecological system).
- Construction of Workspaces BA-477-MOD (partial), BA-480-MOD, BA-481-MOD (partial), BA-485-MOD, BA-487-MOD, BA-487X2-MOD, BA-496-MOD (partial), BA-768-MOD, BA-769-MOD, BA-770-MOD, BA-771-MOD, BA-772-MOD, BA-773-MOD, would result in 19.44 acres of disturbance in Category 2 Shrub-Steppe with Big Sage habitat (Inter-Mountain Basins Big Sagebrush Shrubland ecological system).

The Proposed Change occurs entirely within ODFW designated elk (*Cervus canadensis*) and mule deer (*Odocoileus hemionus*) winter range habitat. Timing restrictions in winter range habitats (CON-FW-01) do not allow ground-disturbing activities between December 1-March 31, unless an exception is approved,

The Proposed Change occurs entirely within greater sage-grouse (GRSG, *Centrocercus urophasianus*) low-density habitat identified by the ODFW (impacting 31.14 acres of low-density habitat). Potential impacts will be mitigated through the Sage-Grouse Habitat Mitigation Plan which includes temporal restrictions on activities in GRSG habitat from March 1 to June 30.

Several species of noxious weeds were observed in the Proposed Change area during surveys (Tetra Tech, 2023b, Maps 67-70). The spread of noxious weeds will be mitigated by weed wash stations and treatment procedures established by the Noxious Weed Plan.

Wetlands, Waters, and Fish Passage Plans

Three aquatic features were delineated in the vicinity of the Proposed Change. One palustrine emergent wetland (BA-W-01) is located approximately 64 feet north of the intersection of Access Roads BA-677-MOD and BA-493, and outside of the proposed work area expansion. Ephemeral stream BA_WT_STRM_228 parallels portions of Access Road BA-496-MOD. Expansion of BA-496-MOD would be conducted on the upslope side and away from the ephemeral stream to avoid potential impacts. BA-496-MOD crosses ephemeral stream BA_WT_STRM_220 near its intersection with BA-493. This crossing is in a relatively flat area, and no additional expansion would be needed at the stream crossing. No impacts to wetlands or waters of the state or United States are anticipated as a part of the Proposed Change.

Special-Status Species Surveys

The Proposed Changes are not within the range of the Washington ground squirrel (WAGS); therefore, no WAGS surveys are required and no impacts on the species or their habitat are anticipated.

Botanical surveys were conducted to evaluate the presence of threatened, endangered, or other special-status plants (Tetra Tech, 2023a, Maps 67-70). Several populations of Oregon Department of Agriculture-(ODA) listed endangered plant species, Snake River goldenweed (*Pyrocoma radiata*), were observed in the vicinity during these surveys. Portions of Snake River goldenweed populations that are within the proposed expansion area would be flagged for avoidance and no impacts would occur. Activities within the area of the Proposed Change would comply with all applicable special-status plant mitigation and avoidance measures.

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

2.0 Amendment Determination Evaluation and Analysis

Pursuant to OAR 345-027-0357(1)(b), the purpose of this ADR is to obtain ODOE determination that the Proposed Change does 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 Change would result in neither significant adverse impact the Council has not addressed in an earlier order nor an adverse impact to any resource or interest protected by the Council's standards, as described under OAR 345-027-0050(4)(a). Additionally, the section 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 Evaluation of Council Standards and Applicable Site Certificate Conditions

This section (**Table 2**) provides a review of the Proposed Changes as it relates to each Division 22 Standard, potentially applicable Division 24 Standards and other standards with related Site Certificate Conditions. The table includes a written evaluation with justification that the Proposed Change does not result in any significant adverse impacts that the Council has not addressed in an earlier order, and that the Proposed Change would not change the Certificate Holder's ability to comply with the existing Site Certificate Conditions, as listed.

TABLE 2.

STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATIONS

Standard	Evaluation	Related Site Certificate Conditions
<p>OAR 345-022-0000 General Standard of Review</p>	<p>The Council previously found that the Facility complies with the General Standard of Review. The Proposed Change would not affect this finding and would not result in any significant impacts not previously evaluated by the Council.</p> <p>The Proposed Change to the existing Facility was identified by the construction contractor in coordination with the BLM (tax lots 12S43E03100, 12S44E03000 and 13S44E00700) and within existing easement of private tax lots 13S44E00800, 12S43E05600, 12S43E04800. The Certificate Holder obtained a secondary use agreement with landowners of tax lots 13S44E01500 and 12S43E03000. A copy of the easements/agreements and a map overlaying the Proposed Change will be provided to ODOE as a confidential attachment.</p> <p>The Proposed Change increases temporary Facility construction disturbance by 31.14 acres. The Site Boundary and the micrositing corridor would remain unchanged.</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 Council rules, and all relevant state and local laws, rules, and ordinances. The Proposed Change would 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: Preconstruction 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</p> <p>Not Applicable: OPR-GS-01: Annual reporting OPR-GS-02: Site legal description OPR-GS-03: Vegetation restoration</p>
<p>OAR 345-022-0010 Organizational Expertise</p>	<p>The Proposed Change was identified as necessary during a field review conducted by contractors responsible for access road development in this portion of the Facility. The review identified the need for additional disturbance width to create a safer workspace to reconstruct safe and stable driving surfaces due to steep terrain in the vicinity.</p> <p>The Proposed Change is a practical adjustment based on on-site conditions and construction expertise and would not alter the Certificate Holder's ability to comply with the conditions of the Site Certificate.</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 compliance</p>

TABLE 2.

STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATIONS

Standard	Evaluation	Related Site Certificate Conditions
		<p>PRE-OE-03: Proof of third-party permits</p> <p>Not Applicable: OPR-OE-01: Proof of inspection</p>
<p>OAR 345-022-0020 Structural Standard</p>	<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>No active landslide features were identified in the vicinity of the Proposed Change during geotechnical investigations. The terrain in the vicinity of the Proposed Change consists of rolling to steep hills and steep slopes exceeding 15 percent. The Proposed Change provides additional construction workspace to reconstruct safe and stable driving surfaces on existing roads previously approved in the Second Amended Site Certificate.</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 Change would not alter the Certificate Holder’s ability to comply with Site Certificate conditions, nor would it affect the basis for the Council’s previous findings that the Structural Standard is satisfied.</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: Preconstruction geological reports</p>
<p>OAR 345-022-0022 Soil Protection</p>	<p>The Proposed Change would result in 31.14 acres of additional temporary ground disturbance within the previously approved micrositing corridor and Facility Site Boundary.</p> <p>Erosion and sediment control best management practices would be implemented to ensure effective stormwater management and minimize sediment delivery from disturbed areas, consistent with those identified in the 1200-C Construction Stormwater General Permit for the Project (ODEQ, 2025). All ground-disturbing activities would comply with the approved Erosion and Sediment Control Plan (ESCP).</p> <p>Topsoil within the work areas would be stockpiled for application 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</p>	<p>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 compliance</p> <p>Not Applicable: GEN-SP-04: Blasting Plan finalization OPR-SP-01: Soil erosion impacts inspections</p>

TABLE 2.

STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATIONS

Standard	Evaluation	Related Site Certificate Conditions
	<p>Prevention Control and Countermeasures (SPCC) Plan. No blasting would be required for this work.</p> <p>The Proposed Change would not alter the Certificate Holder's ability to comply with Site Certificate conditions, nor would it affect the basis for the Council's previous findings that the Soil Protection Standard is satisfied.</p>	
<p>OAR 345-022-0030 Land Use</p>	<p>The Proposed Change would not result in any significant land-use impacts not previously evaluated by the Council. All work would occur within the micrositing corridor and Facility Site Boundary.</p> <p>The Proposed Change is located within Baker County's Exclusive Farm Use (EFU) zone and complies with Baker County Code Chapter 410 and ORS 215.275, which allow utility facilities necessary for public service as conditional uses in EFU zones, including associated access roads. To qualify, such facilities must demonstrate locational dependency, technical necessity, and serve public health and safety. The Proposed Change modifies workspace for previously approved access roads to accommodate construction needs for authorized transmission line components. Because the Proposed Change is integral to facility construction, it is considered part of the utility infrastructure and eligible under EFU provisions.</p> <p>The Proposed Change would result in approximately 31.14 acres of temporary disturbance within rangeland and rangeland/timber as designated in the Agricultural Assessment and Mitigation Plan under GEN-LU-11. The temporary disturbance associated with the Proposed Change would occur along existing roadways and would minimally reduce amount of forage available to grazing animals in the area during construction. It is not expected to have a direct impact on any other ongoing agricultural practices. Following the completion of construction activities, areas of temporary disturbance would be restored and reseeded per GEN-FW-01.</p> <p>Construction of the Facility would comply with the 2023 Agricultural Lands Assessment and Mitigation Plan (IPC, 2023a). Mitigation actions employed by the Certificate Holder pursuant to this mitigation plan, unless otherwise specified in this mitigation plan or other agreement negotiated with an individual landowner, would be implemented within 45 days following completion of final cleanup on an affected property, or as conditions allow. Temporary repairs would be made by Certificate Holder during construction or operation, as needed, to minimize the risk of additional property damage or interference with access to or use of the property. Baker</p>	<p>GEN-LU-07: Baker County permitting GEN-LU-11: Agricultural Mitigation Plan GEN-LU-13: ROW Clearing Assessment PRE-LU-02: Baker County aggregate suppliers CON-LU-01: Baker County setback distances</p> <p>Not Applicable: 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-05: Union County permitting GEN-LU-06: Union County setback distances GEN-LU-08: Malheur County permitting GEN-LU-09: Malheur County setback distances GEN-LU-10: City of North Powder setback distances GEN-LU-12: Transmission line ROW in Goal 4 forest lands</p>

TABLE 2.

STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATIONS

Standard	Evaluation	Related Site Certificate Conditions
	<p>County zoning and underlying agricultural use information are shown in the Land Use map in Appendix A.</p> <p>The proposed road improvements would comply with all applicable Baker County permitting requirements (GEN-LU-07) and mitigation outlined in GEN-LU-11. Therefore, the Proposed Change would not alter the basis for the Council's earlier findings that the Land Use Standards are satisfied, nor would it affect the Certificate Holder's ability to comply with Site Certificate conditions.</p>	<p>PRE-LU-01: Umatilla County road construction CON-LU-02: Morgan Lake notification</p>
<p>OAR 345-022-0040 Protected Area</p>	<p>The Proposed Change is within the existing analysis area for the Protected Areas Standard and within the Site Boundary. The Proposed Change would not impact Protected Areas and would not alter the basis for the Council's earlier findings that the Protected Areas Standard is satisfied.</p>	<p>Not Applicable: GEN-PA-01: Wildlife agency coordination GEN-PA-02: Ladd Marsh Wildlife Area avoidance</p>
<p>OAR 345-022-0050 Retirement and Financial Assurance</p>	<p>The Proposed Changes would not alter the Certificate Holder's ability to restore the site to a useful, non-hazardous condition following the completion of construction.</p> <p>The Proposed Change would add 31.14 acres of temporary disturbance associated with the additional workspaces; it would not result in additional permanent disturbance nor add access roads to the Facility. Changes to the retirement costs would be tracked and the Certificate Holder will adjust the amount of the bond as needed, pursuant to PRE-RT-01.</p> <p>The Certificate Holder would maintain the financial assurance mechanisms required by the Site Certificate, including a bond or letter of credit sufficient to cover site restoration. The Proposed Change would not affect the Council's earlier findings that the Retirement and Financial Assurance Standard is satisfied, nor would it alter the Certificate Holder's ability to comply with Site Certificate conditions.</p>	<p>GEN-RT-01: Prevention of non-restorable site PRE-RT-01: Preconstruction 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</p>

TABLE 2.

STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATIONS

Standard	Evaluation	Related Site Certificate Conditions
<p>OAR 345-022-0060 Fish and Wildlife Habitat</p>	<p>The Proposed Change is entirely within the micrositings corridor and therefore within areas previously surveyed for fish and wildlife habitat.</p> <p>Proposed Workspace BA-677-MOD and a portion of Workspace BA-496-MOD are within habitat designated as Category 2 Native Grassland by ODFW. The areas would be reclaimed following construction per the Category 2 Native Grasslands Reclamation, Revegetation, and Monitoring Plan (IPC, 2025).</p> <p>Noxious weeds were identified within the area of the proposed expansion during botanical surveys conducted in 2023 (Tetra Tech, 2023b, Maps 67-70). Species observed included jointed goatgrass (<i>Aegilops cylindrica</i>), Scotch thistle (<i>Onopordum acanthium</i>), medusahead rye (<i>Taeniatherum caput-medusae</i>), and whitetop/hoary cress (<i>Lepidium draba</i>). A weed wash station will be located on access roads BA-518 to the south and BA-766 to the north to mitigate the spread of noxious weeds in addition to mitigation procedures established by the Noxious Weed Plan.</p> <p>Per GEN-FW-04, the Proposed Change occurs within many different ODFW fish and wildlife habitats. Proposed Workspace BA-677-MOD and a portion of Workspace BA-496-MOD are within Category 2 Native Grassland habitat, which requires a 1:1/2 ratio of additional temporary impacts to compensatory habitat mitigation acres. All other workspaces occur in ODFW Category 2 habitat types (Western Juniper/Mountain Mahogany Woodland / Shrub-Steppe with Big Sage) that require a 1:2 ratio of temporary impacts to compensatory habitat mitigation (IPC, 2024).</p> <p>Per OPR-FW-01, during the third year of operation, the Certificate Holder will provide the Council with a report demonstrating that fish and wildlife habitat mitigation is commensurate with the final compensatory mitigation calculations. As a part of this documentation, total disturbance associated with construction of the Facility will be rectified using as-built data collected following site reclamation. Final permanent disturbance will include all Facility components that will be used for Operations and Maintenance of the transmission line. Final temporary disturbance calculations will utilize staking data for the limits-of-disturbance, the final permanent disturbance, and any areas of unauthorized temporary disturbance that may have occurred as a part of discharges or other potential compliance items observed during construction.</p> <p>The Proposed Change is within ODFW elk and mule deer winter range habitat. Timing restrictions in winter range habitats (CON-FW-01) do not allow ground-disturbing activities between December 1-March 31, unless an exception is approved.</p>	<p>GEN-FW-01: Category 2 Native Grasslands Reclamation, Revegetation, and Monitoring Plan GEN-FW-03: Noxious Weed Plan finalization GEN-FW-04: Fish and Wildlife Habitat Mitigation Plan GEN-FW-05: Construction personnel training GEN-FW-06: Environmentally sensitive area flagging and mapping GEN-FW-07: Private facility access road speed limit PRE-FW-02: Biological surveys CON-FW-01: Elk or mule deer winter range CON-FW-03: Migratory bird nesting season surveys CON-FW-04: Raptor nest buffers CON-FW-05: Sage-Grouse Habitat Mitigation Plan compliance CON-FW-06: Sage-grouse areas construction restrictions OPR-FW-01: Compensatory mitigation calculations report</p> <p>Not Applicable: GEN-FW-02: Vegetation Management Plan compliance GEN-FW-08: Avian Protection Plan compliance PRE-FW-01: Biological surveys on unsurveyed land PRE-FW-03: Sage-Grouse Habitat Mitigation Plan finalization PRE-FW-04: Elk and sage-grouse habitat traffic study (preconstruction)</p>

TABLE 2.

STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATIONS

Standard	Evaluation	Related Site Certificate Conditions
	<p>During the avian breeding season, protocol ground surveys for non-raptorial migratory bird nests will occur within 7 days prior to ground disturbance at construction locations. 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 migratory bird and raptor protection would be followed, which include spatial and temporal nest avoidance.</p> <p>The Proposed Change occurs entirely within GRSG low-density habitat. Potential impacts will be mitigated through the Sage-Grouse Habitat Mitigation Plan which includes temporal restrictions on activities in GRSG habitat from March 1 to June 30. Per OPR-FW-03 the Certificate Holder will update the amount of GRSG habitat compensatory mitigation required for the Facility and implement accordingly. The final calculations will be performed by ODFW using the Oregon Sage-Grouse Habitat Quantification Tool. After receiving the calculations from ODFW, the Certificate Holder shall provide the Council a report demonstrating that GRSG habitat mitigation is commensurate with the final compensatory mitigation calculations.</p> <p>The Proposed Change would not alter the Certificate Holder's ability to comply with the Site Certificate conditions. Therefore, the Proposed Change would not alter the basis for the Council's prior findings that the Fish and Wildlife Standard is satisfied.</p>	<p>CON-FW-02: Pygmy rabbit colony or bat roost observation 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>OAR 345-022-0070 Threatened and Endangered Species</p>	<p>The Proposed Change is within the micrositeing corridor and therefore within areas previously surveyed for threatened and endangered species.</p> <p>The Proposed Changes are located outside the range of the Washington ground squirrel (<i>Urocitellus washingtoni</i>, WAGS), and therefore no surveys are required.</p> <p>Surveys for threatened and endangered plant species were conducted within the footprint of the Proposed Change and identified populations of ODA-listed endangered Snake River goldenweed (Tetra Tech, 2023d, Maps 67-70). Portions of Snake River goldenweed populations within the proposed expansion area would be flagged for avoidance and activities within the area of the Proposed Change would comply with all applicable special-status plant mitigation and avoidance measures. Survey areas and locations of Snake River goldenweed populations are shown on the Resource Survey and Resource Maps in Appendix A.</p>	<p>CON-TE-02: Threatened or endangered plant species buffer</p> <p>Not Applicable: CON-TE-01: WAGS habitat restrictions</p>

TABLE 2.

STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATIONS

Standard	Evaluation	Related Site Certificate Conditions
	<p>The Proposed Change would not affect the Council'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>	
<p>OAR 345-022-0080 Scenic Resources</p>	<p>The Proposed Change would 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 Scenic Resources Standard is satisfied.</p>	<p>Not Applicable: GEN-SR-01: Dull-galvanized steel GEN-SR-02: Ladd Marsh Wildlife Management Area modifications GEN-SR-03: National Historic Oregon Trail Interpretive Center modifications GEN-SR-04: Birch Creek Area modifications</p>
<p>OAR 345-022-0090 Historic, Cultural, and Archaeological Resources</p>	<p>The Certificate Holder's cultural consultant conducted a cultural survey in 2011, 2016, and 2022 that included the Proposed Change disturbance area. Cultural resource survey areas are indicated in the Cultural Resource Map in Appendix A. No resources recommended as Eligible for National Register of Historic Places (NRHP)-listing were observed within the Proposed Change areas. No adverse effects to cultural resources are anticipated from the Proposed Change as all activities would comply with the requirements outlined in Appendix G of the Historic Properties Management Plan (AECOM Technical Services, 2023).</p> <p>The Proposed Change would not alter the Certificate Holder's ability to comply with the Site Certificate conditions and would not alter the basis for the Council's earlier findings that the Historic, Cultural, and Archaeological Resources Standard is satisfied.</p>	<p>Not Applicable: GEN-HC-01: Trail resource avoidance GEN-HC-02: Historic Properties Management Plan OPS-HC-01: Cultural Resources Technical Report</p>
<p>OAR 345-022-0100 Recreation</p>	<p>The Proposed Change would 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>	<p>Not Applicable: GEN-RC-01: Morgan Lake construction criteria</p>

TABLE 2.

STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATIONS

Standard	Evaluation	Related Site Certificate Conditions
<p>OAR 345-022-0110 Public Services</p>	<p>The Proposed Change is within the existing analysis area for Public Services. There would be no alteration in limiting public services due to the Proposed Change. The Proposed Change would not alter the basis for the Council's earlier findings that the Public Services Standard is satisfied, nor alter the Certificate Holder's ability to comply with the Site Certificate conditions.</p>	<p>GEN-PS-02: Fire Prevention and Suppression Plan submission PRE-PS-02: Traffic impacts and transportation coordination PRE-PS-04: Environmental and Safety Training Plan submission Not Applicable: PRE-PS-01: Owyhee Irrigation District consultation and mitigation PRE-PS-03: FAA and Oregon Department of Aviation hazard determinations GEN-PS-01: Helicopter Use Plan submission GEN-PS-03: DELETED</p>
<p>OAR 345-022-0115 Wildfire Prevention and Risk Mitigation</p>	<p>All construction and operation activities associated with the Proposed Change will comply with the Fire Prevention and Suppression Plan. The Proposed Change would not alter the basis for the Council'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.</p>	<p>GEN-PS-02: Fire Prevention and Suppression Plan submission GEN-WMP-01 Wildfire Mitigation Plan (WMP) Not Applicable: OPR-WMP-01: Annual WMP report submittal</p>

TABLE 2.

STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATIONS

Standard	Evaluation	Related Site Certificate Conditions
<p>OAR 345-022-0120 Waste Minimization</p>	<p>The Certificate Holder's Construction Waste Management Plan applies to both the Certificate Holder and contractors associated with this Proposed Change. The Proposed Change would not alter the basis for the Council's earlier findings that the Waste Minimization Standard is satisfied, nor alter the Certificate Holder's ability to comply with Site Certificate Conditions.</p>	<p>GEN-WM-01: Construction Waste Management Plan submission</p>
<p>OAR 345-024-0090 Siting Standards for Transmission Lines</p>	<p>The Proposed Change would not affect the basis for the Council'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.</p>	<p>Not Applicable: GEN-TL-01: Reducing human exposure to electromagnetic fields GEN-TL-02: National Electric Safety Code compliance PRE-TL-01: Preconstruction Public Utility Commission briefing OPR-TL-01: Shock risk reduction OPR-TL-02: Annual Public Utility Commission safety updates</p>
<p>OAR 635-412-0035 Fish Passage</p>	<p>The area of the Proposed Changes does 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 Council's prior findings that the Fish Passage Standard is satisfied and would not alter the Certificate Holder's ability to comply with the Site Certificate conditions.</p>	<p>Not Applicable: GEN-FP-01: Fish Passage Plan finalization</p>

TABLE 2.

STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATIONS

Standard	Evaluation	Related Site Certificate Conditions
<p>OAR 340-035-0035 Noise Control Regulations</p>	<p>The Proposed Changes would not result in any exceedance of Oregon Department of Environmental Quality (ODEQ) noise control standards. The Proposed Change would not impact transmission line corona noise.</p> <p>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 ODEQ's noise control rules. As such, the temporary construction noise associated with the Proposed Change is not subject to enforcement under this rule.</p> <p>The Proposed Change would not affect the Council's earlier findings that the Noise Control Regulations Standard is satisfied, nor would it alter the Certificate Holder's ability to comply with Site Certificate Conditions.</p>	<p>Not Applicable: GEN-NC-01: Site-Specific Noise Exceedance Mitigation Plans GEN-NC-02: Attachment X-7 update and notification CON-NC-01: Corona noise minimization OPR-NC-01: Foul weather ambient antidegradation standards exception OPR-NC-02: Foul weather ambient antidegradation standards variation</p>
<p>ORS 196.795-990 Removal Fill Law</p>	<p>The Certificate Holder submitted a Site Rehabilitation Plan in March 2023 (IPC, 2023b) that established criteria and procedure for the reclamation process of wetland vegetation and a Compensatory Wetland and Non-Wetland Mitigation Plan (CWNWMP) in July 2024. Any impacts due to the Proposed Change would be permitted and disturbance would be mitigated in accordance with the 2023 Site Rehabilitation plan and 2024 CWNWMP.</p> <p>Three aquatic features were delineated in the vicinity of the Proposed Change. One palustrine emergent wetland (BA-W-01) is located approximately 64 feet north of the intersection of Access Roads BA-677-MOD and BA-493, and outside of the proposed work area expansion. Ephemeral stream BA_WT_STRM_228 parallels portions of Access Road BA-496-MOD. Expansion of BA-496-MOD would be conducted on the upslope side and away from the ephemeral stream to avoid potential impacts. BA-496-MOD crosses ephemeral stream BA_WT_STRM_220 near its intersection with BA-493. This crossing is in a relatively flat area, and no additional expansion is planned at the stream crossing. No impacts to wetlands or waters of the state or United States are anticipated as a part of the Proposed Change.</p> <p>The Proposed Change would not affect the Council's earlier findings that the Removal Fill Law Standard is satisfied and would 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 PRE-RF-01: Wetland delineation reports submission PRE-RF-02: JPA update</p>

Conclusion

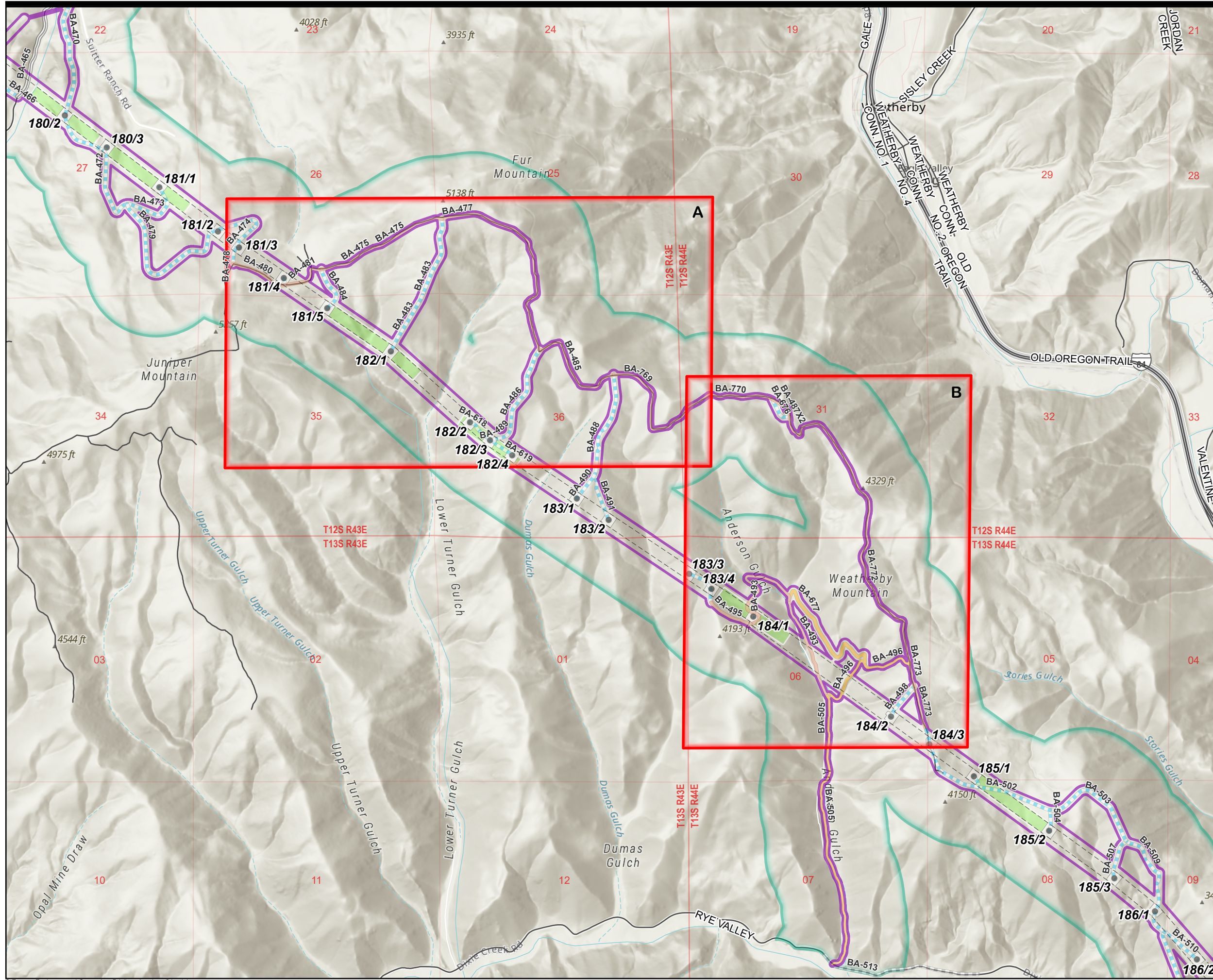
The Certificate Holder provides this ADR to demonstrate that the Proposed Change does not fall under factors outlined in OAR 345-027-0350 that would require an amendment to the Site Certificate. The Proposed Change is located entirely within the existing Site Boundary and would not impair the Certificate 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 Change.

References

- AECOM Technical Services. (2023). Boardman to Hemingway Transmission Line Project Property-Specific Mitigation and Monitoring Plan for Built Environment Historic Properties in Oregon.
- Energy Facility Siting Council of the State of Oregon (EFSC). (2024). Second Amended Site Certificate for Boardman to Hemingway Transmission Line. Retrieved October 6, 2025, from <https://www.oregon.gov/energy/facilities-safety/facilities/Facilities%20library/2024-08-23-B2HAMD2-Final-Order-Attachments.pdf>
- Idaho Power Company. (2023a). B2H OPS GEN-LU-11 Agricultural Lands Assessment and Mitigation Plan.
- Idaho Power Company. (2023b). B2H OPS GEN-RF-01 Site Rehabilitation Plan.
- Idaho Power Company. (2024). B2H OPS GEN-FW-04 Fish and Wildlife Habitat Mitigation Plan.
- Idaho Power Company. (2025). B2H OPS GEN-FW-01: Category 2 Native Grasslands Reclamation, Revegetation, and Monitoring Plan.
- Oregon Department of Environmental Quality (ODEQ). (2025) National Pollutant Discharge Elimination System Construction Stormwater Discharge Permit.
- Shannon & Wilson. (2024). Geotechnical Engineering Report - Baker County. Boardman to Hemingway Transmission Line Project.
- Tetra Tech. (2023a). Boardman to Hemingway Transmission Line Project 2023 Special Status Plants Survey.
- Tetra Tech. (2023b). Boardman to Hemingway Transmission Line Project 2023 Noxious Weed Survey.

APPENDIX A

FACILITY MAPS



Legend

- Location of Change

Facility Features

- Structures
- - - Right-of-way (ROW)
- EFSC Micrositing Corridor
- EFSC Site Boundary

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

Structural Work Areas

- Pulling and Tensioning
- Structure Work Area

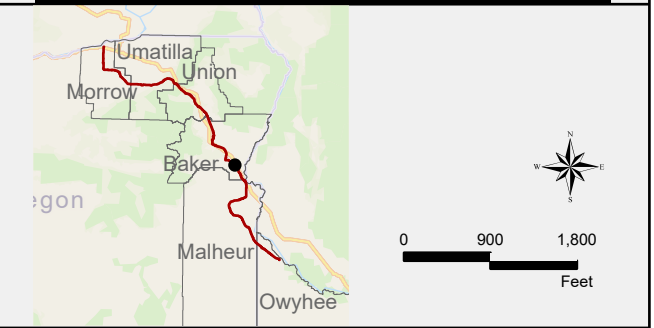
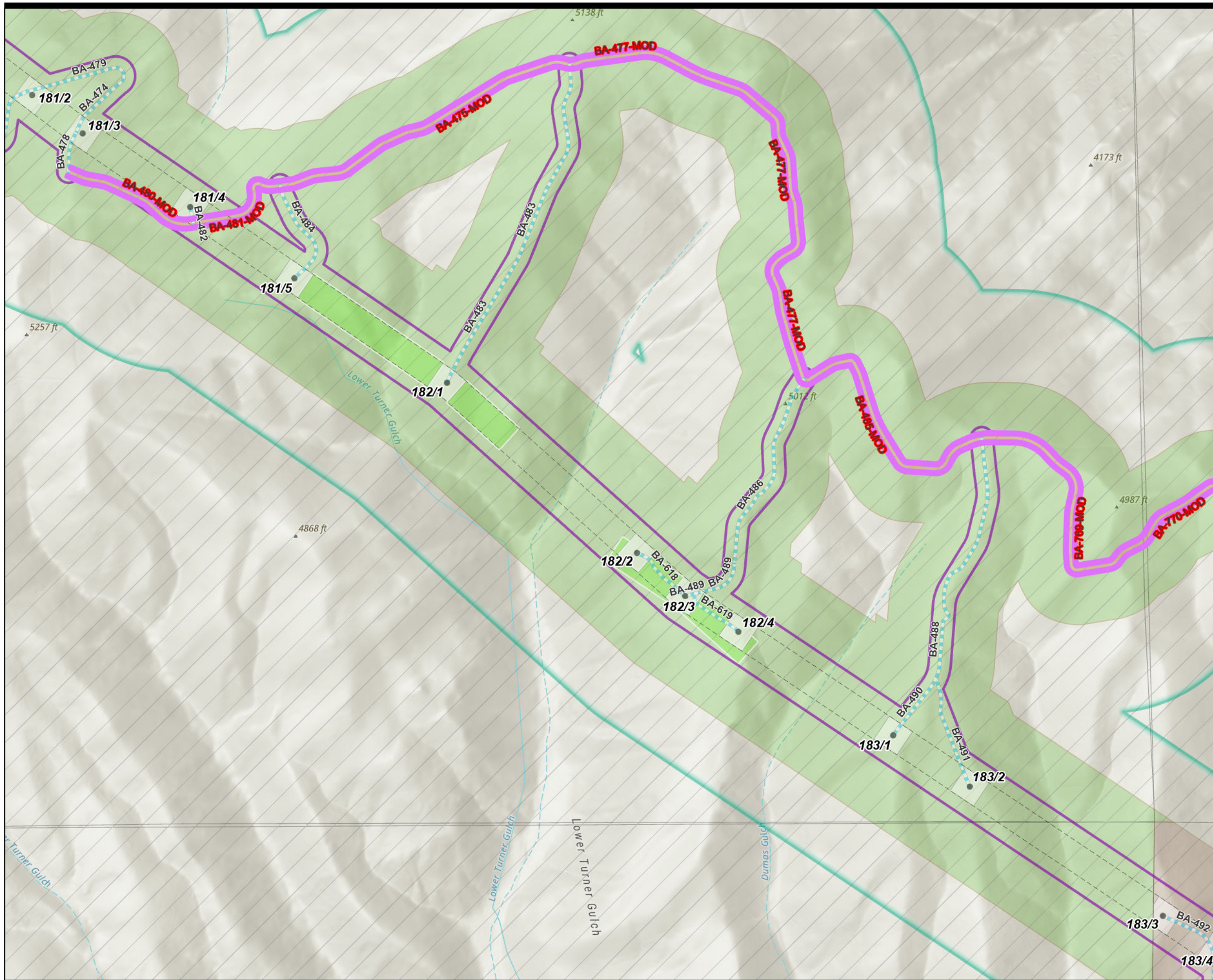


Figure 1. Facility Overview

Boardman to Hemingway 500kV Transmission Line (B2H)
 Access Road Expansion From 181/3 to 186/4
 Amendment Determination Request

NAD 1983 UTM Zone 11N 4/7/2026

Project Features IFC Rev2c, 20250915



Legend

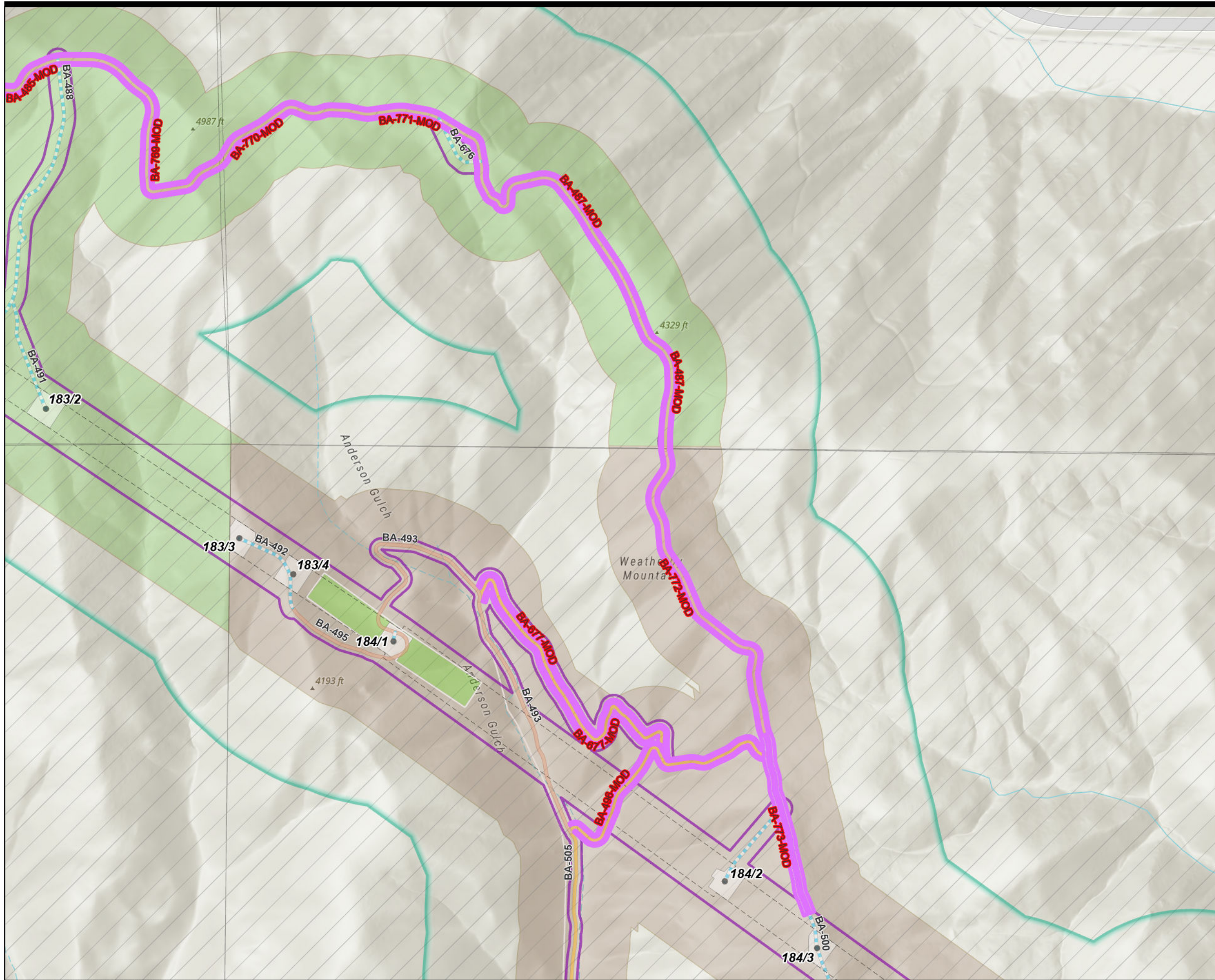
- Proposed Workspace Expansion
- Facility Features**
 - Structures
 - Right-of-way (ROW)
 - EFSC Micrositing Corridor
 - EFSC Site Boundary
- Access Roads**
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
- Land Use Zoning**
 - Exclusive Farm Use
- Agricultural Use**
 - Rangeland
 - Rangeland/Timber



Figure 2A. Land Use Map
 Boardman to Hemingway 500kV Transmission Line (B2H)
 Access Road Expansion From 181/3 to 186/4
 Amendment Determination Request

NAD 1983 UTM Zone 11N
 Project Features IFC Rev2c, 20250915
 4/7/2026





- Legend**
- Proposed Workspace Expansion
- Facility Features**
- Structures
 - Right-of-way (ROW)
 - EFSC Micrositing Corridor
 - EFSC Site Boundary
- Access Roads**
- Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
- Land Use Zoning**
- Exclusive Farm Use
- Agricultural Use**
- Rangeland
 - Rangeland/Timber

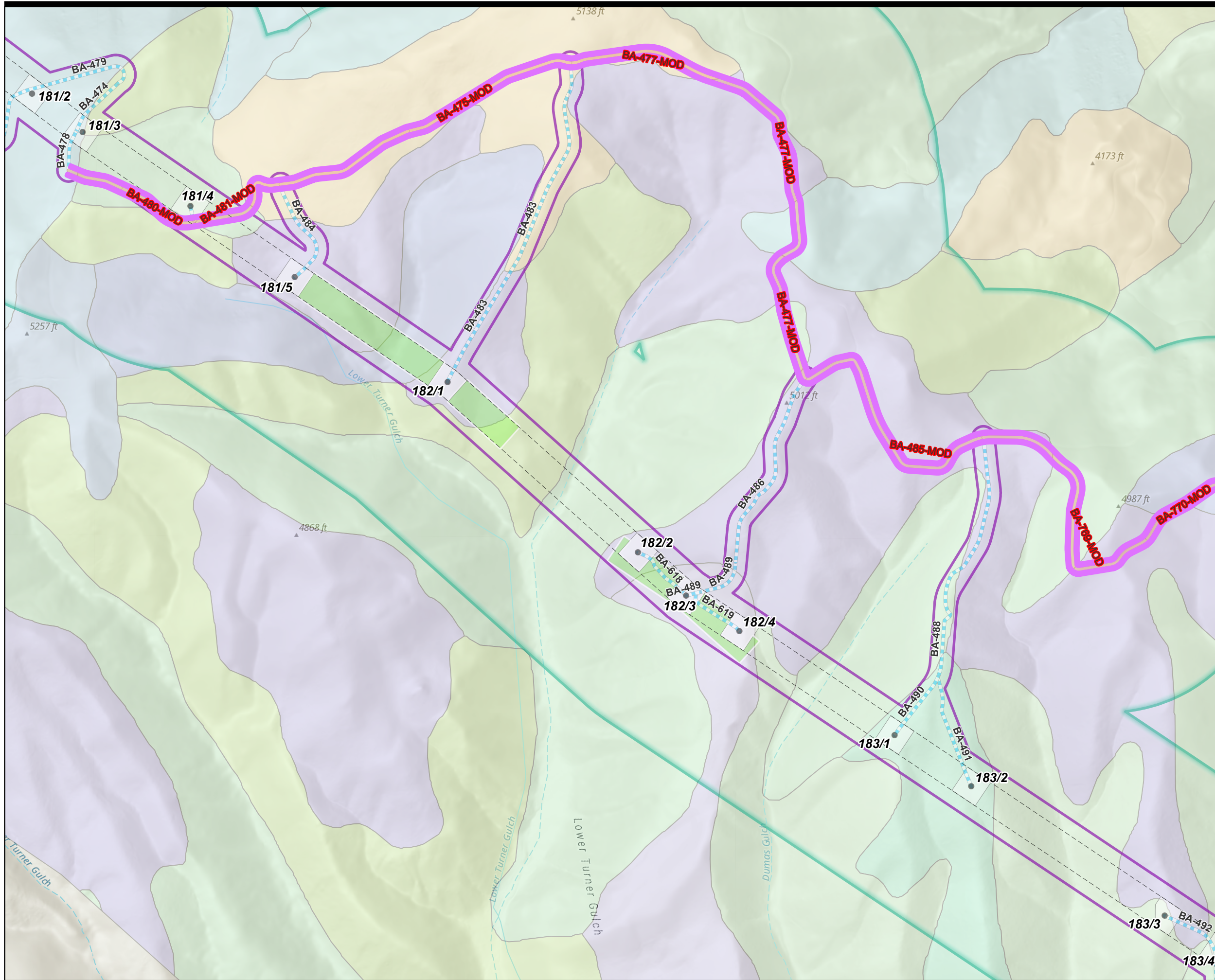


Figure 2B. Land Use Map
 Boardman to Hemingway 500kV Transmission Line (B2H)
 Access Road Expansion From 181/3 to 186/4
 Amendment Determination Request

NAD 1983 UTM Zone 11N 4/7/2026

Project Features IFC Rev2c, 20250915





Legend

- Proposed Workspace Expansion

Facility Features

- Structures
- Right-of-way (ROW)
- EFSC Micrositing Corridor
- EFSC Site Boundary

Access Roads

- Existing Road, Substantial Modification, 71-100% Improvements
- New Road, Bladed

Structural Work Areas

- Pulling and Tensioning
- Structure Work Area

Soil Data

- Ateron very stony loam, 2 to 12 percent slopes
- Lostbasin very channery loam, 12 to 35 percent south slopes
- Lostbasin-Xerorthents-Rock outcrop complex, 35 to 50 percent south slopes
- Lovline channery loam, 30 to 50 percent north slopes
- Lovline channery loam, 50 to 70 percent north slopes
- Piersonte very channery loam, 35 to 50 percent north slopes
- Rock outcrop-Lostbasin-Xerorthents complex, 50 to 80 percent south slopes
- Rock outcrop-Xeric Torriorthents-Darkcanyon complex, 50 to 80 percent south slopes
- Sinker and Chambeam soils, 35 to 50 percent north slopes
- Sinker very channery loam, 50 to 80 percent north slopes
- Snaker-Darkcanyon complex, 30 to 50 percent south slopes
- Snell-Ateron complex, 35 to 60 percent north slopes

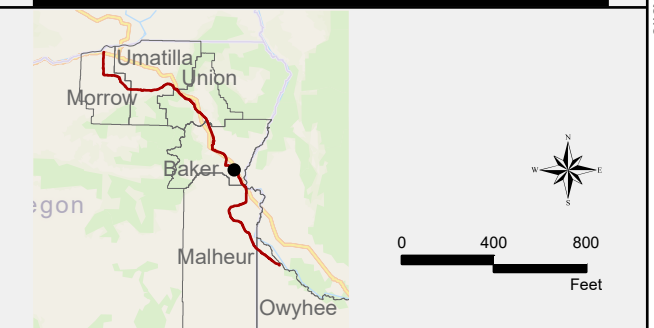
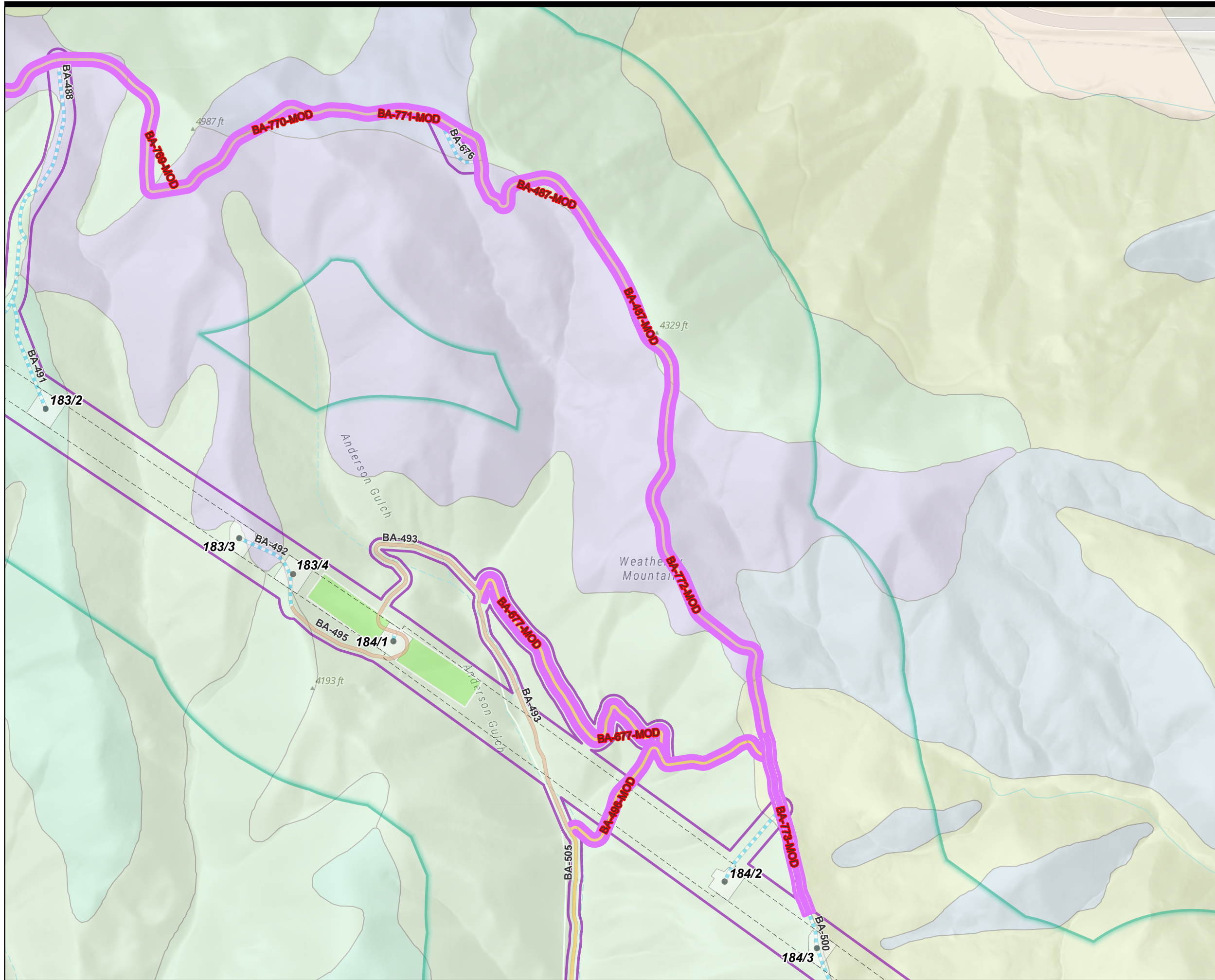


Figure 3A. Soil Data Map
 Boardman to Hemingway 500kV Transmission Line (B2H)
 Access Road Expansion From 181/3 to 186/4
 Amendment Determination Request

NAD 1983 UTM Zone 11N 4/7/2026
 Project Features IFC Rev2c, 20250915





- Legend**
- Proposed Workspace Expansion
- Facility Features**
- Structures
 - Right-of-way (ROW)
 - EFSC Micrositing Corridor
 - EFSC Site Boundary
- Access Roads**
- Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
- Structural Work Areas**
- Pulling and Tensioning
 - Structure Work Area
- Soil Data**
- Cumulic Haploxerolls, 0 to 2 percent slopes
 - Lostbasin-Xerorthents-Rock outcrop complex, 35 to 50 percent south slopes
 - Lovline channery loam, 30 to 50 percent north slopes
 - Lovline channery loam, 50 to 70 percent north slopes
 - Rock outcrop-Lostbasin-Xerorthents complex, 50 to 80 percent south slopes
 - Rock outcrop-Xeric Torriorthents-Darkcanyon complex, 50 to 80 percent south slopes
 - Sinker and Chambeam soils, 35 to 50 percent north slopes
 - Sinker very channery loam, 50 to 80 percent north slopes
 - Snaker channery loam, 50 to 80 percent south slopes
 - Snaker-Darkcanyon complex, 30 to 50 percent south slopes
 - Snaker-Darkcanyon-Xeric Torriorthents complex, 30 to 50 percent south slopes

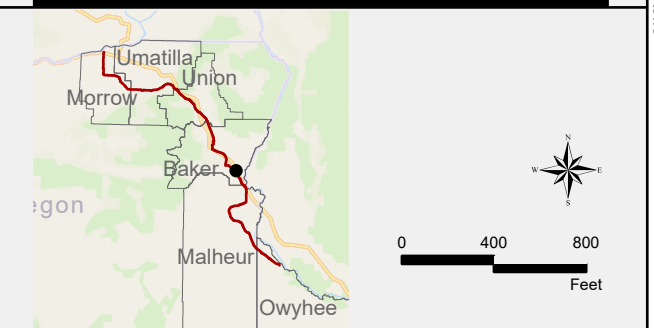
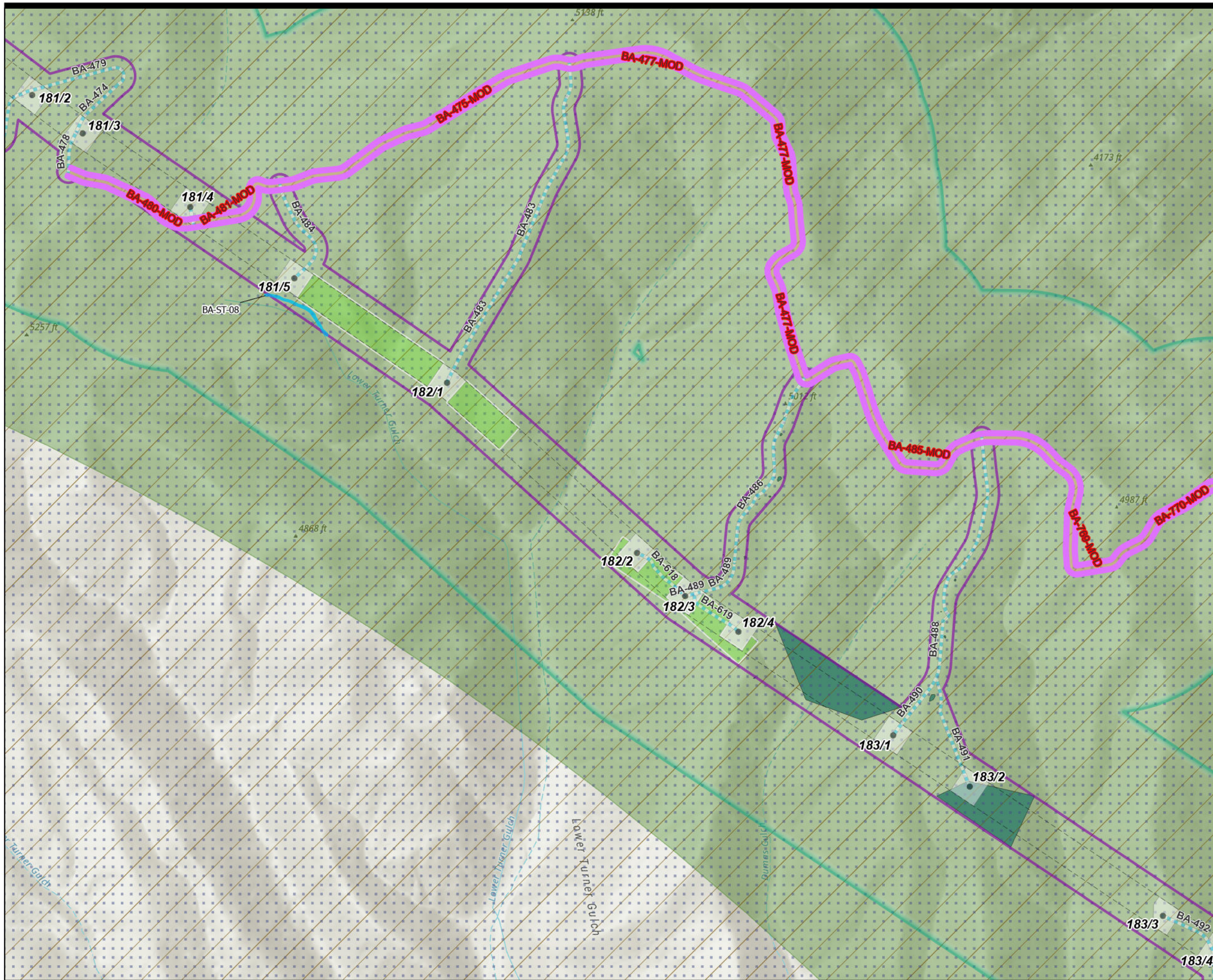


Figure 3B. Soil Data Map
Boardman to Hemingway 500kV Transmission Line (B2H)
 Access Road Expansion From 181/3 to 186/4
 Amendment Determination Request

NAD 1983 UTM Zone 11N 4/7/2026

Project Features IFC Rev2c, 20250915





Legend

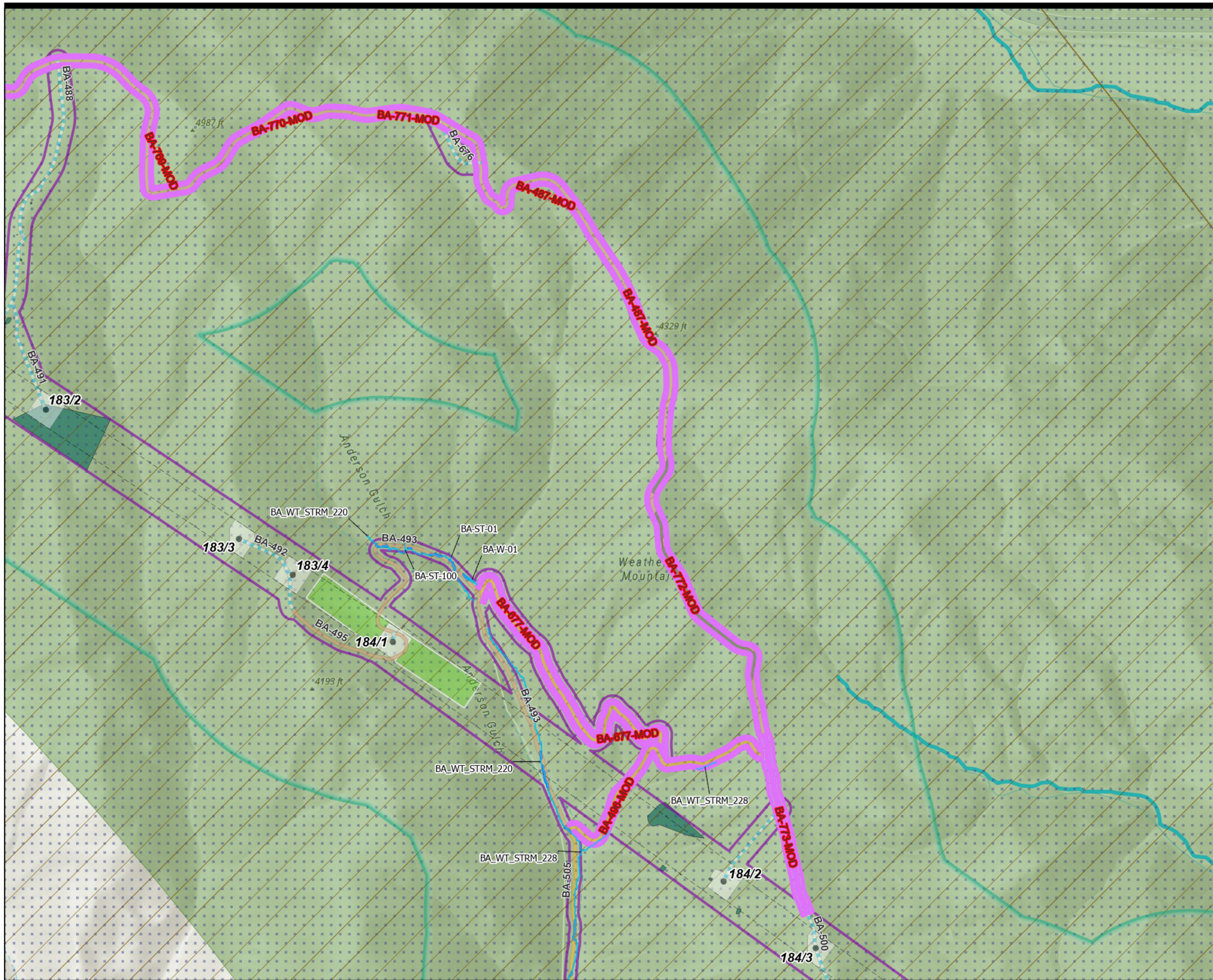
- Proposed Workspace Expansion
- Facility Features**
 - Structures
 - Right-of-way (ROW)
 - EFSC Micrositing Corridor
 - EFSC Site Boundary
- Access Roads**
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
- Structural Work Areas**
 - Pulling and Tensioning
 - Structure Work Area
- Resources**
 - Mule Deer Winter Range
 - Elk Winter Range
 - Pyrocoma radiata (Snake River goldenweed)
 - GRSG Low-Density Habitat
 - Delineated Aquatic Features
 - Delineated Aquatic Features



Figure 4A. Biological Resource Map
 Boardman to Hemingway 500kV Transmission Line (B2H)
 Access Road Expansion From 181/3 to 186/4
 Amendment Determination Request

NAD 1983 UTM Zone 11N
 Project Features IFC Rev2c, 20250915
 4/7/2026





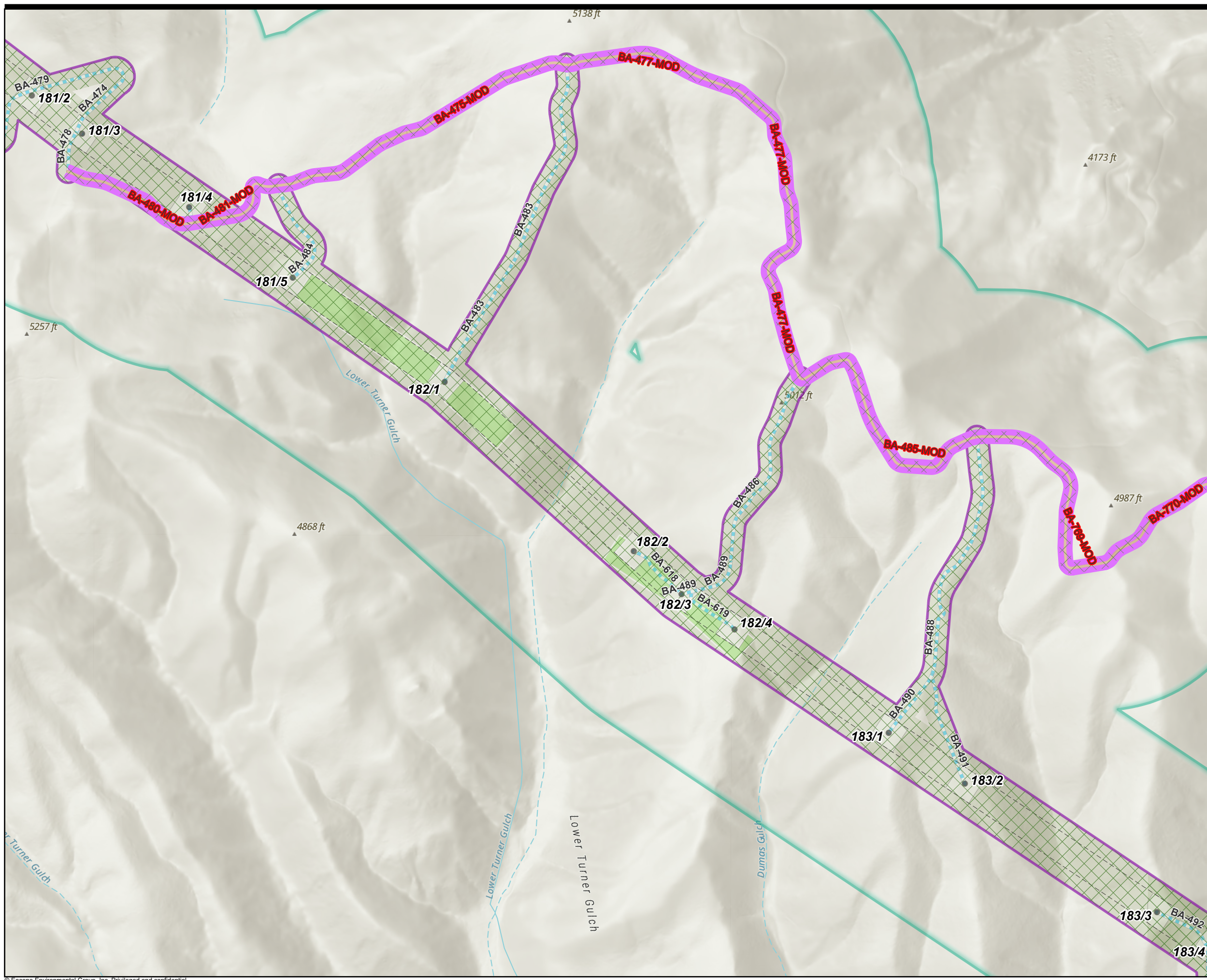
- Legend**
- Proposed Workspace Expansion
 - Facility Features**
 - Structures
 - Right-of-way (ROW)
 - EFSC Micrositing Corridor
 - EFSC Site Boundary
 - Access Roads**
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
 - Structural Work Areas**
 - Pulling and Tensioning
 - Structure Work Area
 - Resources**
 - Mule Deer Winter Range
 - Elk Winter Range
 - Permitted Wetland/Stream Impacts
 - Fish Bearing Streams
 - Pyrocoma radiata (Snake River goldenweed)
 - GRSG Low-Density Habitat
 - Delineated Aquatic Features
 - Delineated Aquatic Features



Figure 4B. Biological Resource Map
 Boardman to Hemingway 500kV Transmission Line (B2H)
 Access Road Expansion From 181/3 to 186/4
 Amendment Determination Request

NAD 1983 UTM Zone 11N
 Project Features IFC Rev2c, 20250915
 4/7/2026





Legend

- Proposed Workspace Expansion
- Facility Features
 - Structures
 - Right-of-way (ROW)
 - EFSC Micrositing Corridor
 - EFSC Site Boundary
- Access Roads
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
- Structural Work Areas
 - Pulling and Tensioning
 - Structure Work Area
 - SSP and Noxious Weeds

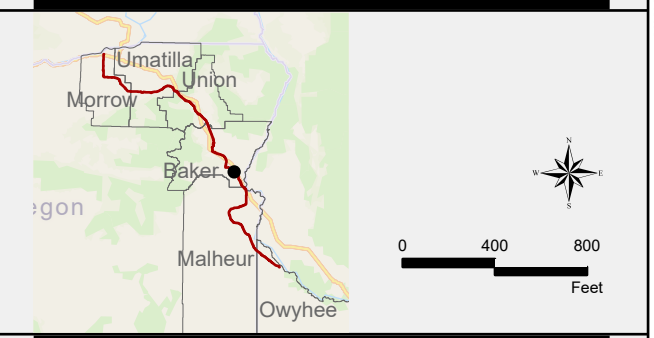
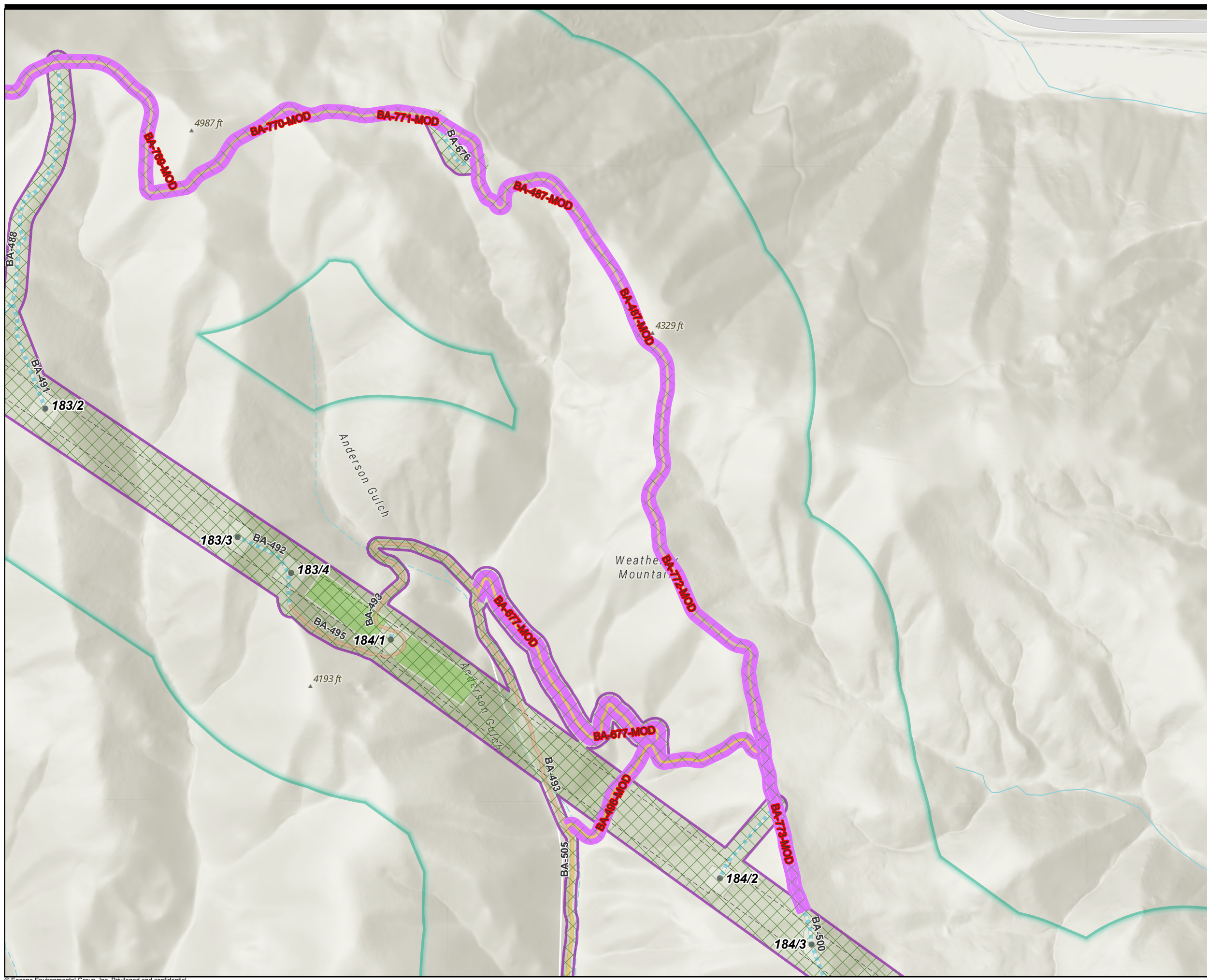


Figure 5A. Biological Resource Survey Map
 Boardman to Hemingway 500kV Transmission Line (B2H)
 Access Road Expansion From 181/3 to 186/4
 Amendment Determination Request

NAD 1983 UTM Zone 11N 4/7/2026

Project Features IFC Rev2c, 20250915





Legend

- Proposed Workspace Expansion

Facility Features

- Structures
- Right-of-way (ROW)
- EFSC Micrositing Corridor
- EFSC Site Boundary

Access Roads

- Existing Road, Substantial Modification, 21-70% Improvements
- Existing Road, Substantial Modification, 71-100% Improvements
- New Road, Bladed

Structural Work Areas

- Pulling and Tensioning
- Structure Work Area
- SSP and Noxious Weeds

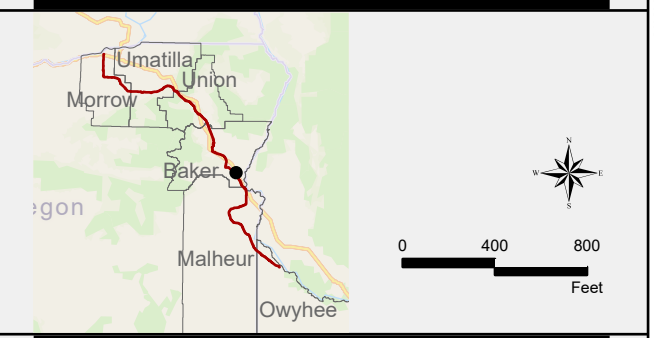
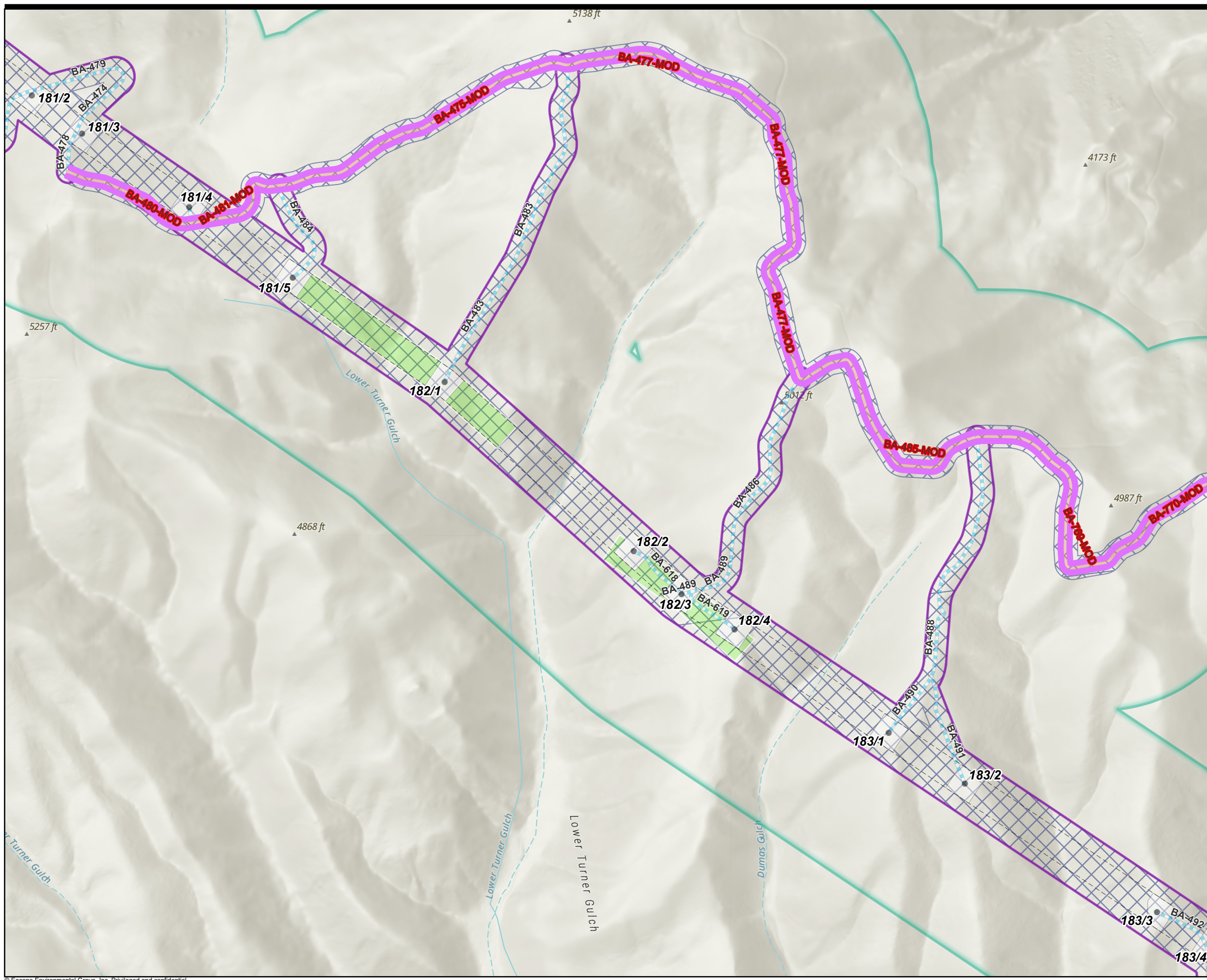


Figure 5B. Biological Resource Survey Map
 Boardman to Hemingway 500kV Transmission Line (B2H)
 Access Road Expansion From 181/3 to 186/4
 Amendment Determination Request

NAD 1983 UTM Zone 11N 4/7/2026

Project Features IFC Rev2c, 20250915





Legend

- Proposed Workspace Expansion
- Facility Features**
 - Structures
 - Right-of-way (ROW)
 - EFSC Micrositing Corridor
 - EFSC Site Boundary
- Access Roads**
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
- Structural Work Areas**
 - Pulling and Tensioning
 - Structure Work Area
- Resources**
 - Cultural Resource Survey Area

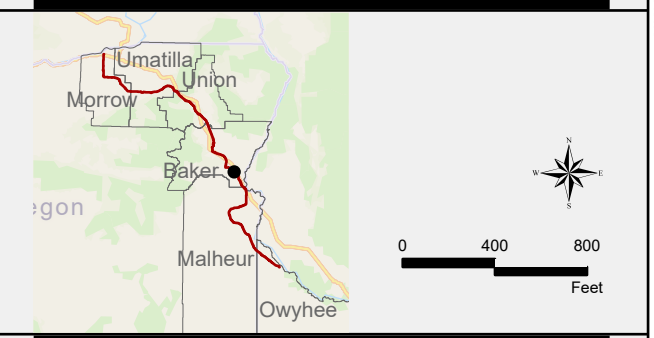


Figure 6A. Cultural Resources Map
 Boardman to Hemingway 500kV Transmission Line (B2H)
 Access Road Expansion From 181/3 to 186/4
 Amendment Determination Request

NAD 1983 UTM Zone 11N 4/7/2026

Project Features IFC Rev2c, 20250915



APPENDIX B

BLM VARIANCE REQUEST FORMS

VARIANCE REQUEST FORM

Boardman to Hemingway (B2H Transmission Project)

Variance Request Number:
VAR_B2H_009

Date Received by CIC:

Section A – Owner/Contractor to Complete

Increased Limit of Disturbance for Multiple Access Roads

Descriptive Title: (181/3 to 186/4) Requested Start Work Date: 04/30/26

Variance Level: Level 1 Level 2 Level 3

Location:

Land Jurisdiction: BLM USFS Other: _____

BOR BIA

Navy State Private

State: Oregon County: BakerUTMs: See Attachment 1Structure(s), Access Road(s), Other: See Attachment 1POD Map Set and Panel Number: See Attachment 1**Purpose and Need Statement:**

The purpose of this variance is to expand the limit of disturbance (LOD) for the below listed Access Roads.

Unique ID	Feature Type
LOD Expansion #1: BA-480-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%
LOD Expansion #2: BA-481-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%
LOD Expansion #3: BA-475-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%
LOD Expansion #4: BA-477-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%
LOD Expansion #5: BA-485-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%
LOD Expansion #6: BA-769-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%

LOD Expansion #7: BA-770-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%
LOD Expansion #8: BA-771-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%
LOD Expansion #9: BA-487X2-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%
LOD Expansion #10: BA-487-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%
LOD Expansion #11: BA-772-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%
LOD Expansion #12: BA-496-MOD	LOD Expansion on Existing Substantial Modification Required, 21-70%
LOD Expansion #13: BA-773-MOD	LOD Expansion on Existing Substantial Modification Required, 71-100%

The expanded LOD is needed due to steep slopes and unstable terrain. Additional disturbance width is needed to safely construct these roads to install a safety berm and an additional area down-slope to catch limited side-casting and ensure that this access road is constructed to a safe width to utilize throughout construction.

Description of Request (include requested construction or maintenance activities, expected timing and duration of activities, and type and number of equipment and personnel required):

The terrain in the 181 to 186 mile is very steep and will require additional disturbance than what is allowable in the POD to construct these types of access roads. This request is to allow a construction disturbance width of 100 feet on multiple Access Roads (BA-480, BA-481, BA-475, BA-477, BA-485, BA-769, BA-770, BA-771, BA-487X2, BA-487, BA-772, BA-496 and BA-773) both Existing Substantial Modification, 71-100% Improvement and Existing Substantial Modification, 21-70% Improvement in this section that are very steep and pose safety concerns during construction.

Based off of the road designations and slopes in the area, Access Roads BA-480, BA-481, BA-475, BA-477, BA-485, BA-769, BA-770, BA-771, BA-487X2, BA-487, BA-772, BA-496, and have a current construction width of 60 feet, an additional 40 feet of disturbance is proposed to be added to these access roads. Based off of the road designations and slopes in the area, access road BA-773 has a current construction width of 25 feet, an additional 75 feet of disturbance is proposed to be added to this access road.

The access roads would be constructed using a D-6 dozer, grader, Marooka/dump truck, excavator, and water truck. It will take one civil construction crew five to seven days to grade the access roads with additional LOD. Crews will work slowly to minimize side-casting to the safest extent possible. Cast materials will be moved to the side of the road and/or disposed of properly to other nearby project facilities. To provide stability of access to roads for construction vehicles, the following would also be installed:

- Ledges and/or dirt berms as an additional measure to prevent sediment going outside the LOD. Berms/ledges will be substantial enough to catch any falling rock/debris

- Super silt fence (with chain link and T-posts) below access road berms where it is possible to prevent sediment going outside the LOD.
- Erosion Control Blankets (ECB) where appropriate to act as an additional measure to prevent sediment going outside the LOD.

Once completed these Access Roads would be maintained for the duration of construction in the area to provide a safe travel surface.

The access road will be reclaimed following construction per the Reclamation, Revegetation, and Monitoring Plan in Appendix C1 of the POD.

Alternatives Considered:

No action at this location would create unsafe construction and maintenance of access roads within these areas. Larger and longer equipment/vehicles are unable to navigate the existing access roads within the current LOD. Lack of adequate space to construct roadways in steep areas may lead to unsafe cut-slopes and potential for loss of material downslope.

Resource Analysis:

The affected area is analyzed within the EIS: Yes No

Reference:

BLM 2016. Final Environmental Impact Statement and Proposed Land Use Plan Amendments for the Boardman to Hemingway Transmission Line Project. Section 2.5 Study and Analysis Methods

Biological Resources

Activity requires a wildlife variance request: Yes No

Activity is within previously surveyed areas: Yes No

Activity is within a seasonally or spatially restricted area: Yes No

Impact to threatened, endangered, or other special-status species: Yes No

Noxious weeds present: Yes No

Brief Summary:

Surveys have been conducted for project features in this area and no impacts are anticipated.

Access Roads BA-480, BA-481, BA-475, BA-477, BA-485, BA-769, BA-770, BA-771, BA-487X2, BA-487, BA-772, BA-496 and BA-773 are located within or cross the following biological restrictions:

- Mule Deer Winter Range (December 1 – March 31)
- Elk Winter Range (December 1 – March 31)

Rare plant *Pyrrocoma radiata* (Snake River goldenweed) was observed in the area during surveys on access roads BA-487 and BA-772. These populations will be staked for avoidance where they overlap with the expanded LOD areas.

Populations of noxious weeds, *Onopordum acanthium* (Scotch thistle) were observed in the area on Access Roads BA-475, BA-485 and BA-487. *Lepidium draba* (Whitetop; hoary cress) was observed in the area on Access Roads BA-475, BA-477 and BA-773.

Proposed Mitigation:

Seasonal and spatial wildlife restrictions will be adhered to as outlined in POD Appendix B1 Attachment D.

All mitigation measures in POD Appendix 2 Federal Weed Management Plan will be followed during construction and reclamation activities.

All mitigation measures related to BLM sensitive plant species in POD Appendix B1 Attachment E: Biological Resources Monitoring Plan will be followed during construction and reclamation activities.

This variance is not requesting removal of POD-stipulated seasonal or spatial restrictions. If work in this location would occur in a seasonal or spatial restriction, a separate variance request would be submitted.

For **wildlife variance requests only**, provide the following information:

Resource Type:

Special-status wildlife habitat (include species):

Raptor (include species, if known):

Non-raptorial migratory bird (include species, if known):

Big game habitat (include species and habitat type):

Greater sage grouse (include active/pending lek info):

Habitat Affected by Variance Request:

Vegetative cover:

Current climatic trends:

Presence of non-project-related disturbance factors:

Amount of habitat affected:

Availability of other habitats:

Extent of topographical and/or vegetative natural sight screening:

Current and Reasonably Foreseeable Use of Habitat:

Visual observations (e.g., pellet counts, burrows, etc.):

Climatic trends:

Anticipated seasonal movement:

Availability and use of other habitats:

Response to other disturbance factors:

Potential Effects of Granting Variance Request and Use of Affected and Adjacent Habitats:

Direct effects:

Indirect effects:

Cumulative effects on habitat values, individuals, and/or groups of animals:

Cultural Resources

Activity is within previously surveyed areas: Yes No

Impact to eligible site: Yes No

Can site be avoided: Yes No

Name of Additional Report: _____

Brief Summary:

The proposed LOD increases are located within areas that were previously evaluated for cultural resources. See the list below for specific information regarding each proposed location:

- LOD Expansion #1: BA-480-MOD: no cultural monitoring required
- LOD Expansion #2: BA-481-MOD: no cultural monitoring required
- LOD Expansion #3: BA-475-MOD: no cultural monitoring required
- LOD Expansion #4: BA-477-MOD: no cultural monitoring required

- LOD Expansion #5: BA-485-MOD: no cultural monitoring required
- LOD Expansion #6: BA-769-MOD: no cultural monitoring required
- LOD Expansion #7: BA-770-MOD: no cultural monitoring required
- LOD Expansion #8: BA-771-MOD: no cultural monitoring required
- LOD Expansion #9: BA-487X2-MOD: no cultural monitoring required; note that this LOD increase location does overlap with a previously documented cultural resource (not eligible)
- LOD Expansion #10: BA-487-MOD: no cultural monitoring required
- LOD Expansion #11: BA-772-MOD: no cultural monitoring required
- LOD Expansion #12: BA-496-MOD: no cultural monitoring required
- LOD Expansion #13: BA-773-MOD: no cultural monitoring required

No impact to cultural resources is anticipated.

Proposed Mitigation:

All activities will be performed in conformance with POD Appendix B5: B2H Historic Properties Treatment Plan and other Project requirements pertaining to cultural resources.

Paleontological Resources

Activity is within previously surveyed areas: Yes No

Name of Additional Report: _____

Brief Summary:

The proposed LOD increases were partially surveyed for paleontological resources in the pre-construction surveys. This area is within the PFYC 2 (low potential) Weatherby Formation using the BLM PFYC. PFYC 2 areas do not require paleontological surveys or monitoring.

Proposed Mitigation:

All activities will be performed in accordance with POD Appendix B6: Paleontological Resources Treatment Plan.

Wetlands/Streams

Impact to wetland(s), stream(s), and/or well/spring(s): Yes No

Brief Summary:

There is an adjacent Access Road (BA-493) where the existing road crosses ephemeral stream BA_WT_STRM_220. Impacts to the stream at this crossing are authorized by Nationwide Permit (NWP) No. 57, Electric Utility Line and Telecommunications Activities (Federal Register, January 13, 2021, Vol. 86, No. 8), and USACE ID:12441866 No. 57 2010-00600.

Ephemeral stream BA_WT_STRM_228 parallels Access Road BA-496. This stream will be flagged and avoided to ensure there are no impacts. Construction will implement earthen berms, downslope BMPs and ECBs as needed to reduce the loss of material downslope during construction. Placing fill within the stream channel will be avoided.

Proposed Mitigation:

Ford BA-493-T01C will be built in accordance with the POD and the ESCP. All activities will be performed in conformance with Project mitigation requirements in POD Appendix B3 Water Resources Protection Plan as well as Erosion and Sediment Control Plan of the 1200-C Permit for the Project.

Ephemeral stream BA_WT_STRM_228 will be flagged and avoided.

Other Resources (potential impacts to other sensitive resources analyzed in the EIS [e.g., noise, air quality, etc.])

Brief Summary:

No impacts on other sensitive resources (noise, visuals, etc.) are anticipated.

Proposed Mitigation:

N/A

Disturbance Assessment:

Does the request:

- Result in additional disturbance not addressed in the POD/SUA: Yes No N/A
- Require consultation with other federal or state agencies: Yes No N/A
- Require an Amendment Determination Request through ODOE: Yes No N/A
- Require tree cutting, removal, or side trimming: Yes No N/A

Disturbance Table:

Activity	Additional Temporary Disturbance (acres)	Additional Permanent Disturbance (acres)
LOD Expansion #1: BA-480-MOD	+0.68	+0.00
LOD Expansion # 2: BA-481-MOD	+0.91	+0.00
LOD Expansion # 3: BA-475-MOD	+2.63	+0.00
LOD Expansion # 4: BA-477-MOD	+4.16	+0.00
LOD Expansion # 5: BA-485-MOD	+2.15	+0.00
LOD Expansion # 6: BA-769-MOD	+2.30	+0.00
LOD Expansion # 7: BA-770-MOD	+1.47	+0.00
LOD Expansion # 8: BA-771-MOD	+0.77	+0.00

LOD Expansion # 9: BA-487X2-MOD	+0.27	+0.00
LOD Expansion # 10: BA-487-MOD	+3.52	+0.00
LOD Expansion # 11: BA-772-MOD	+2.72	+0.00
LOD Expansion # 12: BA-496-MOD	+2.22	+0.00
LOD Expansion # 13: BA-773-MOD	+2.85	+0.00
Total (acres):	+26.65	0.00

Disturbance Notes:

The additional LOD needed along Access Roads BA-480, BA-481, BA-475, BA-477, BA-485, BA-769, BA-770, BA-771, BA-487X2, BA-487, BA-772, BA-496 and BA-773 would be temporary in nature and the roadways would be reclaimed to an operational width of 14 feet during reclamation.

Support Materials:

Provide a map (required), supporting graphic, information, and resource reports that support or explain the proposed activity, as needed.

- Map/Drawing
 Shapefiles
 Photos
 Add'l Resource Reports
 Engineering Drawing

Owner Authorization of Variance:

- Idaho Power Company confirms that the request made in this variance provides a prudent alternative means to support the project, provides updated project documentation, and/or reduces impacts of the Boardman to Hemingway Transmission Project. It has been thoroughly vetted for completeness and addresses potential impacts to resources analyzed in the EIS.

ATTACHMENT 1: WORK AREA LOCATIONS						
LOD EXPANSION NUMBER	DESCRIPTION	ACTIVITY	LANDOWNER	UTM ZONE 11T		POD MAP SET 1 PANEL
				EASTING	NORTHING	
#1: BA-480-MOD	Near Structure 181/4	LOD Expansion	BLM	466621	4926252	194
#2: BA-481-MOD	Near Structure 181/4	LOD Expansion	BLM	466881	4926272	194
#3: BA-475-MOD	Near Structure 181/4	LOD Expansion	BLM BLOOMER, GARY E TTEE	467353	4926478	194
#4: BA-477-MOD	Near structure 182/1	LOD Expansion	BLOOMER, GARY E TTEE	468313	4926454	195
#5: BA-485-MOD	Near Structure 183/1	LOD Expansion	BLOOMER, GARY E TTEE	468642	4925572	195
#6: BA-769-MOD	Near Structure 183/1	LOD Expansion	BLOOMER, GARY E TTEE	469110	4925378	195
#7: BA-770-MOD	Near Structure 183/2	LOD Expansion	BLM	469500	4925497	196
#8: BA-771-MOD	Near Structure 183/3	LOD Expansion	Wick Land & Cattle LLC	469861	4925486	196
#9: BA-487X2-MOD	Near Structure 183/3	LOD Expansion	Wick Land & Cattle LLC	470009	4925394	196
#10: BA-487-MOD	Near structure 183/3	LOD Expansion	Wick Land & Cattle LLC	470378	4925066	196
#11: BA-772-MOD	Near Structure 184/2	LOD Expansion	Wick Land & Cattle LLC BLM	470560	4924200	197
#12: BA-496-MOD	Near Structure 184/2	LOD Expansion	BLM BLOOMER, GARY E TTEE	470425	4923676	197
#13 BA-773-MOD	Near Structure 184/2	LOD Expansion	BLM BLOOMER, GARY E TTEE	470858	4923513	197



Sep 26, 2025 at 10:21:01 AM
+44.486426,-117.398384
177° S

Photo 1: Access Road BA-477

Sep 26, 2025 at 10:08:14 AM
+44.481805,-117.384317
41° NE



Photo 2: Access Road BA-770



Photo 3: Access Road BA-772



Photo 4: Access Road BA-772



Sep 26, 2025 at 9:50:15 AM
+44.468013,-117.367503
170° S

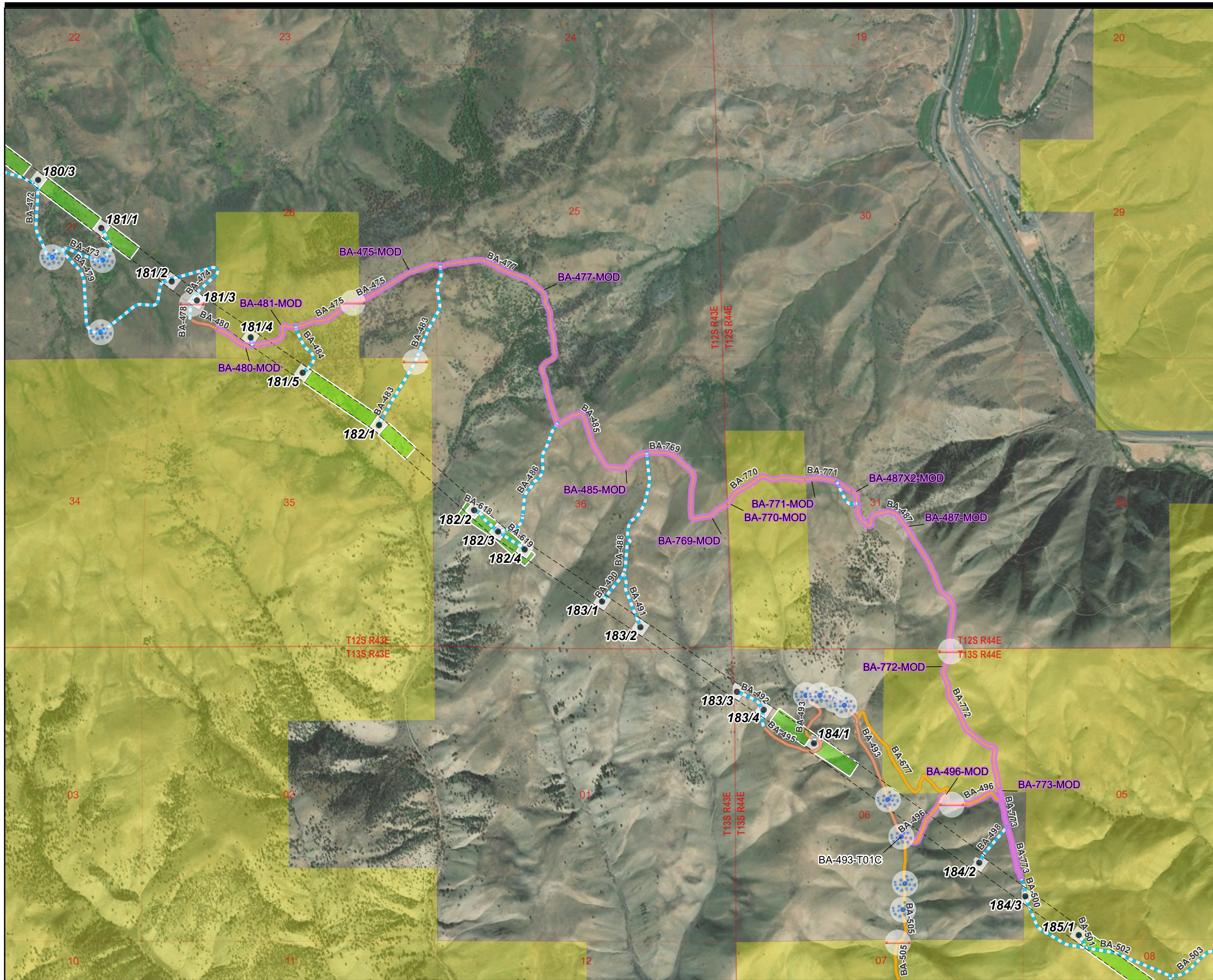
Photo 5: Access Road BA-772



Photo 6: Access Road BA-496

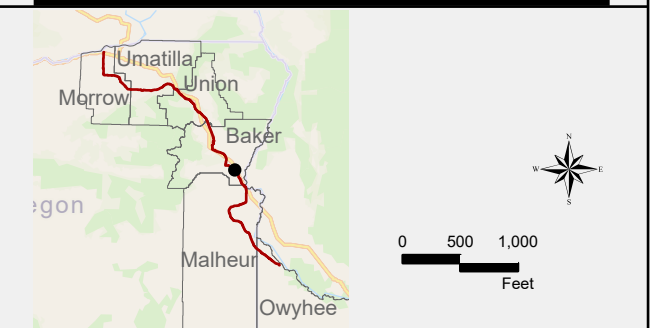


Photo 7: Access Road BA-496



Legend

- Addition of Limit of Disturbance
- Project Features**
 - Structures
 - Right-of-way (ROW)
- Creek/Stream/River Crossing**
 - Creek/Stream/River Crossing
- Fence Crossing - Gated**
 - Fence Crossing - Gated
- Access**
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
- Structural Work Areas**
 - Pulling and Tensioning
 - Structure Work Area
- Land Ownership**
 - BLM
 - PRIVATE

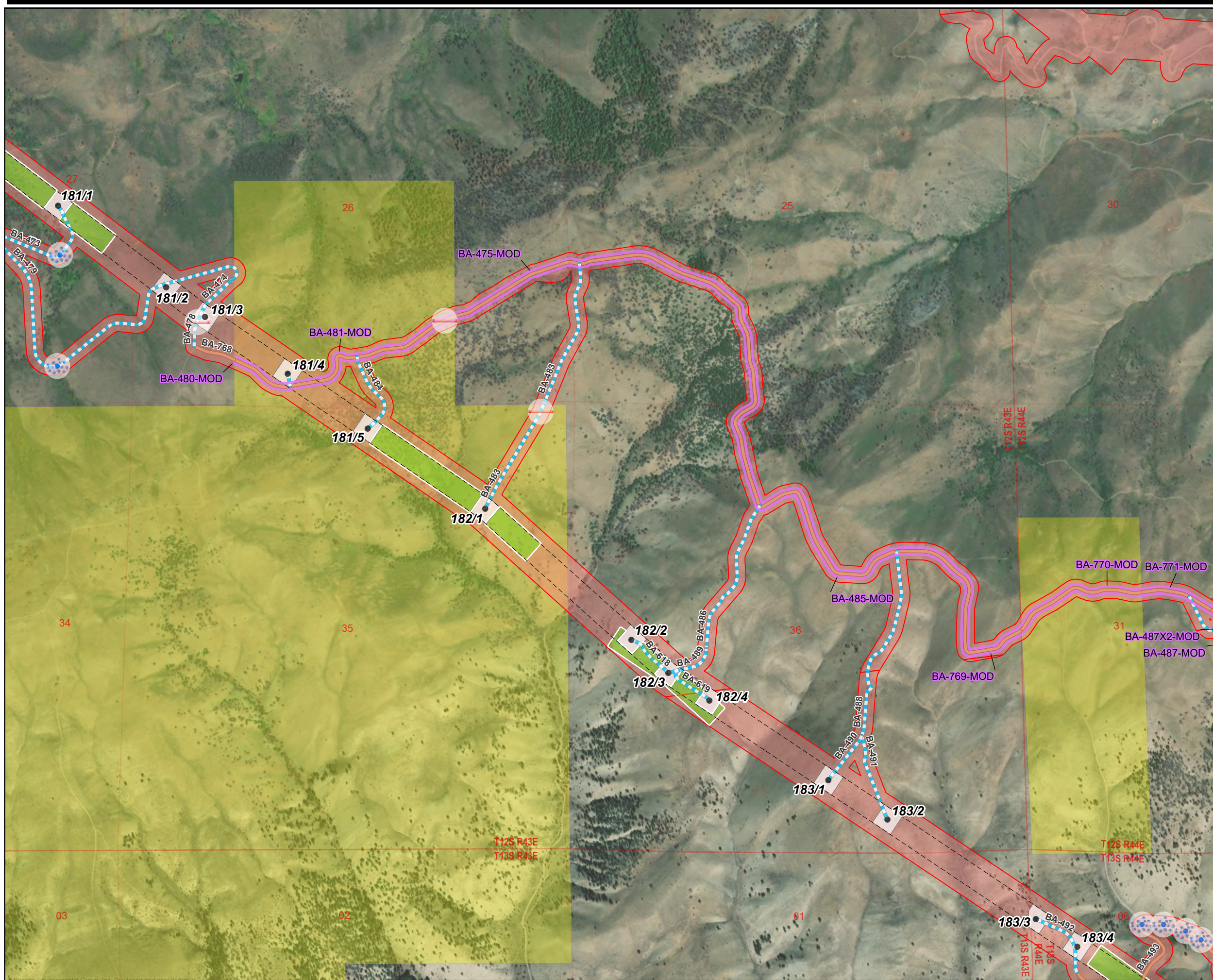


Attachment 1: Work Location

Boardman to Hemingway 500kV Transmission Line (B2H)
B2H-009 (VAR-B2H-009)

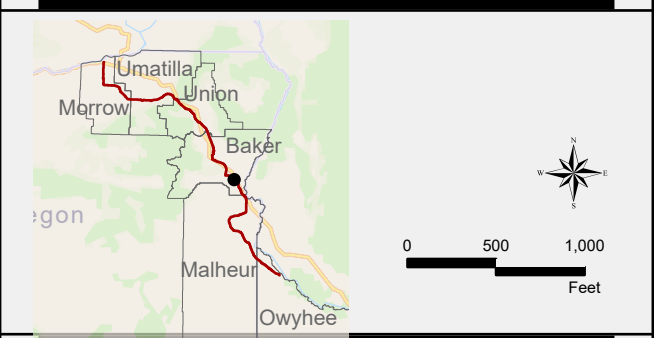
NAD 1983 UTM Zone 11N 3/16/2026

Project Features IFC Rev2c, 20250915



Legend

- Addition of Limit of Disturbance
- Project Features**
 - Structures
 - Right-of-way (ROW)
- Fence Crossing - Gated**
 - Fence Crossing - Gated
- Creek/Stream/River Crossing**
 - Creek/Stream/River Crossing
- Access**
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
- Structural Work Areas**
 - Pulling and Tensioning
 - Structure Work Area
- Class III Cultural Resource Inventories**
 - Class III Cultural Resource Inventories
- Land Ownership**
 - BLM
 - PRIVATE

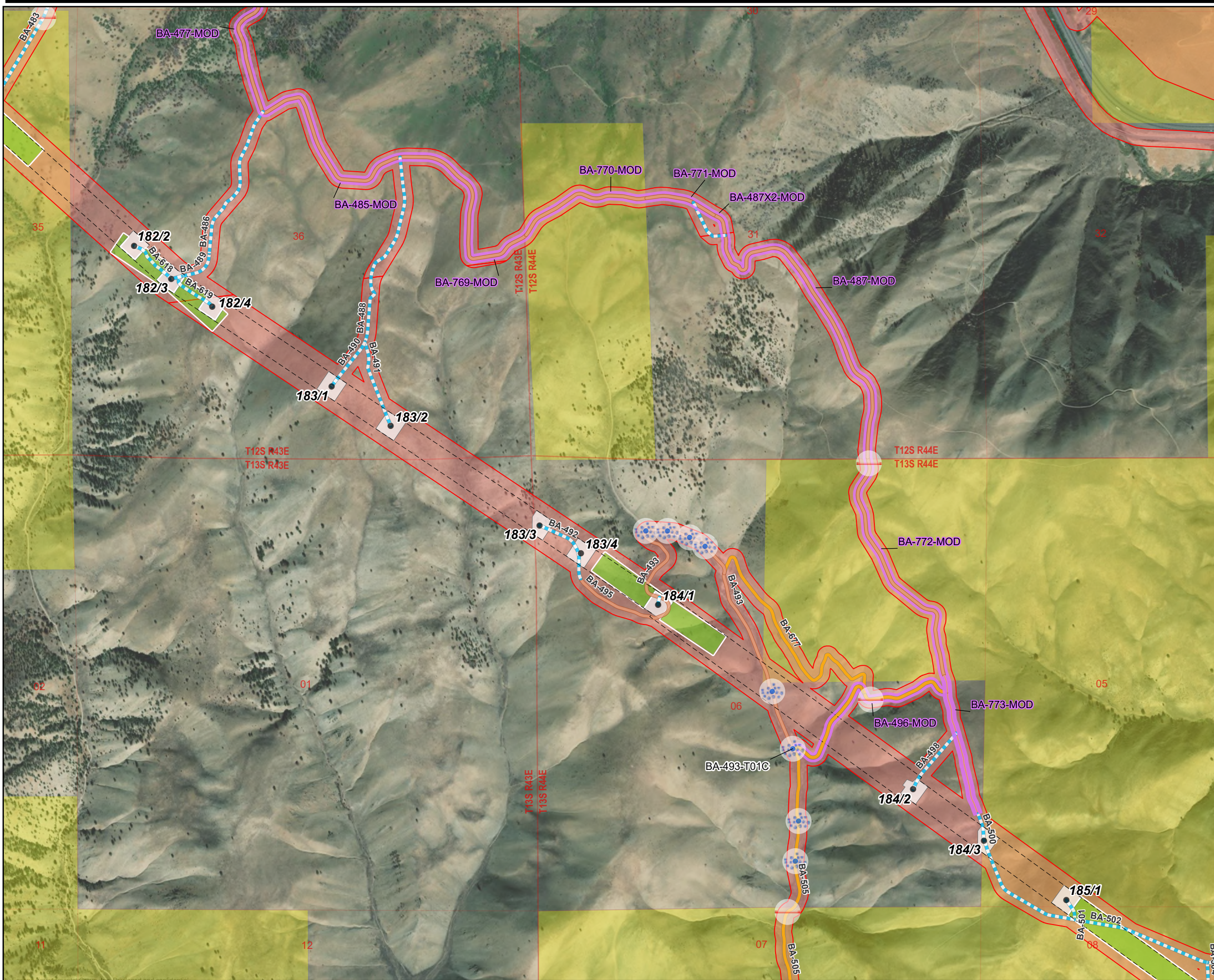


Attachment 3: Cultural Resources

Boardman to Hemingway 500kV Transmission Line (B2H)
B2H-009 (VAR-B2H-009)

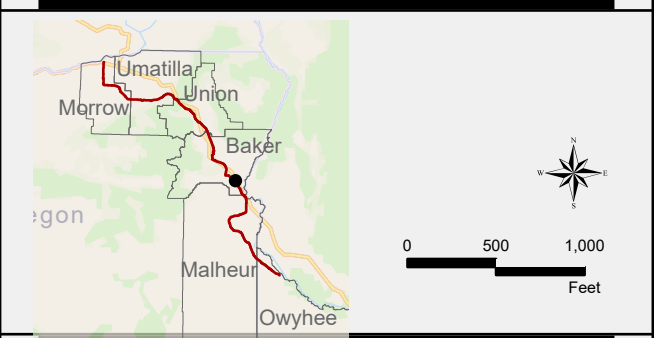
NAD 1983 UTM Zone 11N 3/16/2026

Project Features IFC Rev2c, 20250915



Legend

- Addition of Limit of Disturbance
- Project Features**
 - Structures
 - ▭ Right-of-way (ROW)
- Fence Crossing - Gated**
 - Fence Crossing - Gated
- Creek/Stream/River Crossing**
 - Creek/Stream/River Crossing
- Access**
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
- Structural Work Areas**
 - Pulling and Tensioning
 - ▭ Structure Work Area
- Class III Cultural Resource Inventories**
 - ▭ Class III Cultural Resource Inventories
- Land Ownership**
 - BLM
 - ▭ PRIVATE



Attachment 3: Cultural Resources

Boardman to Hemingway 500kV Transmission Line (B2H)
B2H-009 (VAR-B2H-009)

NAD 1983 UTM Zone 11N 3/16/2026

Project Features IFC Rev2c, 20250915

G:\Projects\Utah - Power Company\Map Files\variance_requests\VAR_B2H_009\VAR_B2H_009.aprx Username: Abigail Cleason

VARIANCE REQUEST FORM

Boardman to Hemingway (B2H Transmission Project)

Variance Request Number:
VAR_B2H_010

Date Received by CIC:

Section A – Owner/Contractor to Complete

	Increased Limit of Disturbance for Access		
Descriptive Title:	Road BA-677	Requested Start Work Date:	10/31/2025
Variance Level:	<input type="checkbox"/> Level 1	<input checked="" type="checkbox"/> Level 2	<input type="checkbox"/> Level 3
Location:			
Land Jurisdiction:	<input checked="" type="checkbox"/> BLM	<input type="checkbox"/> USFS	<input type="checkbox"/> Other: _____
	<input type="checkbox"/> BOR	<input type="checkbox"/> BIA	
	<input type="checkbox"/> Navy	<input type="checkbox"/> State	<input checked="" type="checkbox"/> Private BLOOMER, GARY E TTEE
State:	Oregon	County:	Baker
UTMs:	11T 470243 4923907		
Structure(s), Access Road(s), Other:	BA-677 located east of 184/1		
POD Map Set and Panel Number:	Map Set #1 Panel 131 & 132		

Purpose and Need Statement:

The purpose of this variance is to expand the limit of disturbance (LOD) for access road BA-677 (Existing Substantial Modification Required, 21-70%) due to steep and unstable terrain. The additional disturbance area is needed to safely construct these roads with a safety berm and an additional area down-slope to catch limited side-casting and ensure that this access road is constructed to safely utilize throughout the life of the project.

Description of Request (include requested construction or maintenance activities, expected timing and duration of activities, and type and number of equipment and personnel required):

The current allowable LOD for Access Road BA-677 is 60 feet. This variance request would increase the LOD by an additional 60 feet to provide 120 feet for construction of Access Road BA-677. The access road would be constructed using a D-6 dozer, grader, Marooka/dump truck, excavator, and water truck. It will take one civil construction crew three to five days to grade the access road with additional LOD. Crews will work slowly to minimize side-casting to the safest extent possible. Cast materials will be moved to the side of the road and/or disposed of properly to other nearby project facilities. To provide stability of the access road for construction vehicles, the following would also be installed:

- Ledges and/or dirt berms to prevent sediment going outside the LOD. Berms/ledges will be substantial enough to catch any falling rock/debris
- Super silt fence (with chain link and T-posts) below access road berm where possible to prevent sediment going outside the LOD.

- Erosion Control Blankets (ECB) where appropriate to act as an additional measure to prevent sediment going outside the LOD.

Once completed, Access Road BA-677 would be maintained for the duration of construction in that area to provide a safe travel surface.

The access road will be reclaimed following construction per the Reclamation, Revegetation, and Monitoring Plan in Appendix C1 of the POD.

Alternatives Considered:

An alternative of no action was considered; however this action would result in unsafe conditions. Larger and longer equipment/vehicles are unable to navigate the existing access roads within the current LOD. Lack of adequate space to construct roadways in steep areas may lead to unsafe cut-slopes and potential for loss of material downslope.

Resource Analysis:

The affected area is analyzed within the EIS: Yes No

Reference:

BLM 2016. Final Environmental Impact Statement and Proposed Land Use Plan Amendments for the Boardman to Hemingway Transmission Line Project. Section 2.5 Study and Analysis Methods

Biological Resources

Activity requires a wildlife variance request: Yes No

Activity is within previously surveyed areas: Yes No

Activity is within a seasonally or spatially restricted area: Yes No

Impact to threatened, endangered, or other special-status species: Yes No

Noxious weeds present: Yes No

Brief Summary:

No threatened, endangered or other special-status species were observed during surveys conducted for project features in this area and no impacts are anticipated. Seasonal and spatial wildlife restrictions will be adhered to as outlined in POD Appendix B1 Attachment D.

Access Road BA-677 is located within or crosses the following biological restrictions:

- Mule Deer Winter Range (December 1 – March 31)
- Elk Winter Range (December 1 – March 31)

Native grasslands (Columbia Basin Foothill and Canyon Dry Grassland) are present in this area. Expansion of the access road will impact approximately 4.06 additional acres of native grasslands.

Populations of noxious weeds, *Onopordum acanthium* (Scotch thistle), were observed in the area.

This variance is not requesting removal of POD-stipulated seasonal restrictions. If work in this location would occur in a seasonal or spatial restriction, a separate variance request would be submitted.

Proposed Mitigation:

Seasonal and spatial wildlife restrictions will be adhered to as outlined in POD Appendix B1 Attachment D.

All mitigation measures in POD Appendix 2 Federal Weed Management Plan will be followed during construction and reclamation activities.

For **wildlife variance requests only**, provide the following information:

Resource Type:

Special-status wildlife habitat (include species):

Raptor (include species, if known):

Non-raptorial migratory bird (include species, if known):

Big game habitat (include species and habitat type):

Greater sage grouse (include active/pending lek info):

Habitat Affected by Variance Request:

Vegetative cover:

Current climatic trends:

Presence of non-project-related disturbance factors:

Amount of habitat affected:

Availability of other habitats:

Extent of topographical and/or vegetative natural sight screening:

Current and Reasonably Foreseeable Use of Habitat:

Visual observations (e.g., pellet counts, burrows, etc.):

Climatic trends:

Anticipated seasonal movement:

Availability and use of other habitats:

Response to other disturbance factors:

Potential Effects of Granting Variance Request and Use of Affected and Adjacent Habitats:

Direct effects:

Indirect effects:

Cumulative effects on habitat values, individuals, and/or groups of animals:

Cultural Resources

Activity is within previously surveyed areas: Yes No

Impact to eligible site: Yes No

Can site be avoided: Yes No

Name of Additional Report: _____

Brief Summary:

The proposed location for the increased LOD for access road BA-677 is located within areas that were previously evaluated for cultural resources. There are no documented cultural resources that overlap with BA-677. As per the Project HPMP, cultural resource monitoring is not required for BA-677, but Eocene cultural resource monitors are currently monitoring new, bladed roads. No impacts to cultural resources are expected.

Proposed Mitigation:

All activities will be performed in conformance with POD Appendix B5: B2H Historic Properties Treatment Plan and other Project requirements pertaining to cultural resources.

Paleontological Resources

Activity is within previously surveyed areas: Yes No

Name of Additional Report: _____

Brief Summary:

This area was partially surveyed for paleontological resources in the pre-construction surveys. This area is within the PFYC 2 (low potential) Weatherby Formation according to the BLM PFYC. PFYC 2 areas do not require paleontological surveys or monitoring.

Proposed Mitigation:

All activities will be performed in accordance with POD Appendix B6 Paleontological Resources Treatment Plan.

Wetlands/Streams

Impact to wetland(s), stream(s), and/or well/spring(s): Yes No

Brief Summary:

No aquatic features are present on or near the current road design or the proposed limits of disturbance design.

Proposed Mitigation:

Not applicable, no potential impacts.

Other Resources (potential impacts to other sensitive resources analyzed in the EIS [e.g., noise, air quality, etc.])

Brief Summary:

No impacts on other sensitive resources (noise, visuals, etc.) are anticipated.

Proposed Mitigation:

N/A

Disturbance Assessment:

Does the request:

- Result in additional disturbance not addressed in the POD/SUA: Yes No N/A
- Require consultation with other federal or state agencies: Yes No N/A
- Require an Amendment Determination Request through ODOE: Yes No N/A
- Require tree cutting, removal, or side trimming: Yes No N/A

Disturbance Not Accounted for in the POD/SUA:

Activity	Additional Temporary Disturbance (acres)	Additional Permanent Disturbance (acres)
Increased LOD of Access Road BA-677 (BA-677-MOD)	+4.06 acres	0.00 acres
Total (acres):	+4.06 acres	0.00 acres

Disturbance Notes:

The additional LOD needed along access road BA-677 would be temporary in nature and the roadways would be reclaimed to an operational width of 14 feet during reclamation.

Support Materials:

Provide a map (required), supporting graphic, information, and resource reports that support or explain the proposed activity, as needed.

- Map/Drawing
 Shapefiles
 Photos
 Add'l Resource Reports
 Engineering Drawing

Owner Authorization of Variance:

- Idaho Power Company confirms that the request made in this variance provides a prudent alternative means to support the project, provides updated project documentation, and/or reduces impacts of the Boardman to Hemingway Transmission Project. It has been thoroughly vetted for completeness and addresses potential impacts to resources analyzed in the EIS.



Legend

Proposed Additional Limits of Disturbance (BA-677-MOD)

Project Features

- Structures
- Right-of-way (ROW)

Creek/Stream/River Crossing

- Creek/Stream/River Crossing

Fence Crossing - Gated

- Fence Crossing - Gated

Access

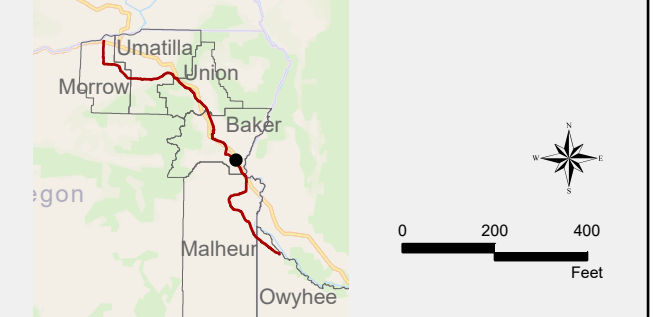
- Existing Road, Substantial Modification, 21-70% Improvements
- Existing Road, Substantial Modification, 71-100% Improvements
- New Road, Bladed

Structural Work Areas

- Pulling and Tensioning
- Structure Work Area

Land Ownership

- BLM
- PRIVATE

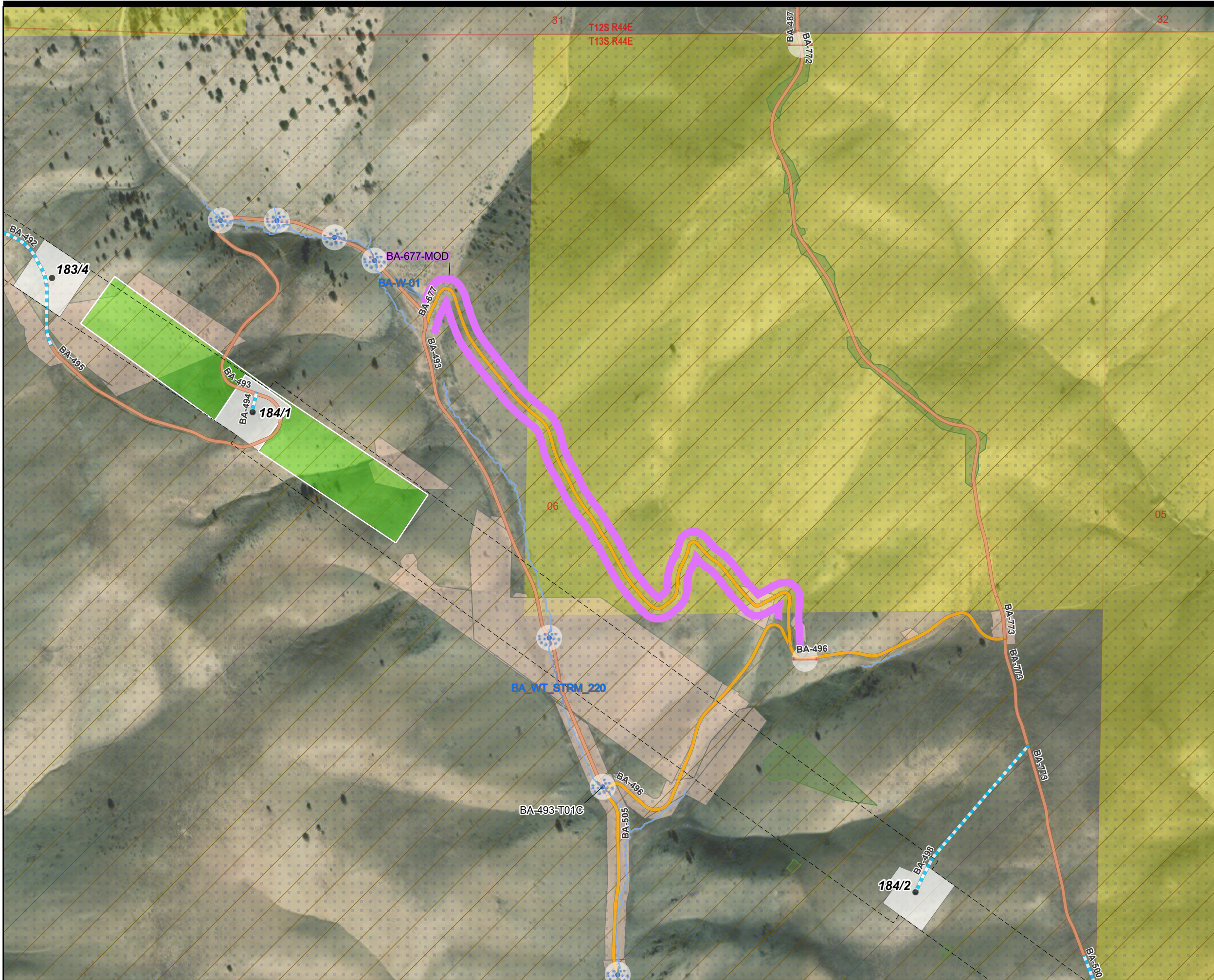


Attachment 1: Work Location

Boardman to Hemingway 500kV Transmission Line (B2H)
B2H-010 (VAR-B2H-010)

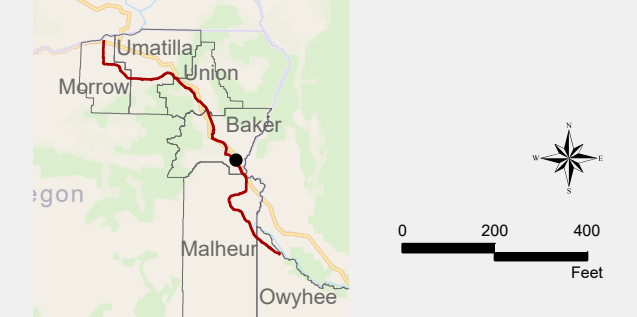
NAD 1983 UTM Zone 11N 10/3/2025

Project Features IFC Rev2c, 20250915



Legend

- Proposed Additional Limits of Disturbance (BA-677-MOD)
- Project Features**
 - Structures
 - Right-of-way (ROW)
 - Creek/Stream/River Crossing**
 - Creek/Stream/River Crossing
 - Fence Crossing - Gated**
 - Fence Crossing - Gated
 - Access**
 - Existing Road, Substantial Modification, 21-70% Improvements
 - Existing Road, Substantial Modification, 71-100% Improvements
 - New Road, Bladed
 - Structural Work Areas**
 - Pulling and Tensioning
 - Structure Work Area
 - JPA Impacts**
 - JPA Impacts
 - Wetland Waters 2011-2024**
 - Wetland Waters 2011-2024
 - Mule Deer Winter Range**
 - Mule Deer Winter Range
 - Elk Winter Range**
 - Elk Winter Range
 - Rare Plant Species**
 - Pyrrocoma radiata (Snake River goldenweed)
 - Noxious Weeds 2022-2023**
 - Noxious Weeds 2022-2023
 - Land Ownership**
 - BLM
 - PRIVATE



Attachment 2: Biological Resources

Boardman to Hemingway 500kV Transmission Line (B2H)

B2H-010 (VAR-B2H-010)

NAD 1983 UTM Zone 11N 10/14/2025

Project Features IFC Rev2c, 20250915





Legend

- Proposed Additional Limits of Disturbance (BA-677-MOD)

Project Features

- Structures
- Right-of-way (ROW)

Creek/Stream/River Crossing

- Creek/Stream/River Crossing

Fence Crossing - Gated

- Fence Crossing - Gated

Access

- Existing Road, Substantial Modification, 21-70% Improvements
- Existing Road, Substantial Modification, 71-100% Improvements
- New Road, Bladed

Structural Work Areas

- Pulling and Tensioning
- Structure Work Area

Environmentally Sensitive Areas

- Monitoring

Class III Cultural Resource Inventories

- Class III Cultural Resource Inventories

Land Ownership

- BLM
- PRIVATE



Attachment 3: Cultural Resources

Boardman to Hemingway 500kV Transmission Line (B2H)

B2H-010 (VAR-B2H-010)

NAD 1983 UTM Zone 11N
 Project Features IFC Rev2c, 20250915
 10/3/2025





Photo 1: Access Road BA-677



Photo 2: Access Road BA-677



Photo 3: Access Road BA-677



Photo 4: Access Road BA-677



Photo 5: Access Road BA-677



Photo 6: Access Road BA-677

Boardman to Hemingway Transmission Line Project (B2H)

Bureau of Land Management

Level 2 Variance Request Decision Document

Variance Request No. 010

Date: 10/20/2025

Due: Requested Work Start Date: 10/31/2025

Variance Rationale/Justification/Need required for each segment (*from CIC*):

Structures	Purpose and need, location, and proposed mitigation for variance request by Segment
Access Road BA-677	<p>Purpose and Need: The purpose of this variance is to expand the limit of disturbance (LOD) for access road BA-677 (Existing Substantial Modification Required, 21-70%) due to steep and unstable terrain. The additional disturbance area is needed to safely construct these roads with a safety berm and an additional area down-slope to catch limited side-casting and ensure that this access road is constructed to safely utilize throughout the life of the project.</p> <p>Jurisdiction: BLM and Private Location: Baker County, OR</p> <p>Proposed Mitigation: <u>Biological Resources</u> – Seasonal and spatial wildlife restrictions will be adhered to as outlined in POD Appendix B1 Attachment D. All mitigation measures in POD Appendix 2 Federal Weed Management Plan will be followed during construction and reclamation activities</p> <p><u>Cultural Resources</u> – All activities will be performed in conformance with POD Appendix B5: B2H Historic Properties Treatment Plan and any other Project requirements pertaining to cultural resources.</p> <p><u>Paleontological Resources</u> - All activities will be performed in accordance with POD Appendix B6 Paleontological Resources Treatment Plan.</p> <p>Disturbance: The shift will result in an overall increased disturbance of 4.06 acres which includes approximately 0.00 acres of permanent and 4.06 acres of temporary disturbance.</p>

Recommendations from CIC:

Structures	Recommend Approval	Recommend Approval with Conditions	Recommend Disapproval	Rationale/Comments/Conflict
Access Road BA-677		<p>Cultural Resources – Gena Huffman</p>		<p>Cultural resources monitoring is required during construction. If cultural resources are found, construction would stop within 30 m of the discovery, and the Inadvertent Discovery Plan (Appendix B, HPMP) would be followed.</p>

Structures	Recommend Approval	Recommend Approval with Conditions	Recommend Disapproval	Rationale/Comments/Conflict
	Biological Resources – Ben Bainbridge			Recommend approval with no additional comments. No impacts to biological resource anticipated.
	Botany-Adrien Elseroad			No rare plant concerns. Noxious weeds present- all mitigation measures in POD Appendix B2 Federal Weed Management Plan will be followed during construction and reclamation activities.
	Water Resources - Wendy Hosman			No water resources within the vicinity of the proposed variance.
	Paleontological Resources – Michael Pasenko			Variance B2H-VAR-010 is within geologic unit JTrsv consisting of volcanic wacke and siltstone with some conglomerate, slate, and minor siltstone and chert.. The BLM PFYC dataset shows this as having a PFYC of 2 which would not need any mitigation
		Civil Engineering- Stuart Toraason		In the Mitigation description, include the expansion and relocation, as needed, for all applicable E&S Control and permanent stabilization/restoration measures including the standard specification/detail citation(s) from the POD. For Ledges and Dirt Berms, Super Silt Fence, Erosion Control Blankets – Include citations and provide the construction specifications/details from the POD or other approved documents and plan view drawing depicting locations. In the Mitigation also include the plan for remediating slips and cracks that may occur on the uphill cuts and/or downslope side cast material following road installation.

Variance request necessity evaluation (*populated by CIC*)

The design change request for this variance is necessary for construction.

Comments:

The design change request is for convenience and not necessary for construction.

Comments:

Resources affected (by segment) by this Variance Request (*populated by CIC**):

Structures	Hydrology	Cultural Resources	Paleontology	Wildlife	Special Status Plants	Lands and Realty	Civil	Fire Management	Safety Review	Invasive, Non-Native	General CIC Review
Access Road BA-677	x	x	x	x	x		x			x	x

*This table is primarily for CIC use to determine which segments are delivered to specific resource specialists. Only specific segments are sent to the individual resource specialists.

Recommendations from BLM (populated by BLM specialist):

Structures	Recommend Approval	Recommend Approval with Conditions	Recommended Disapproval	Rationale/Comments/Conflict/Conditions
Access Road BA-677		Cultural Resources – Monica Weimer		Monitor for cultural resources during construction. If cultural resources are found, stop construction within 30 m of the discovery, and follow IDP.

Recommendation:

Approval with Conditions

Conditions:

- Cultural resources monitoring is required during construction. If cultural resources are found, construction would stop within 30 m of the discovery, and the Inadvertent Discovery Plan (Appendix B, HPMP) would be followed.
- In the Mitigation description, include the expansion and relocation, as needed, for all applicable E&S Control and permanent stabilization/restoration measures including the standard specification/detail citation(s) from the POD. For Ledges and Dirt Berms, Super Silt Fence, Erosion Control Blankets – Include citations and provide the construction specifications/details from the POD or other approved documents and plan view drawing depicting locations. In the Mitigation also include the plan for remediating slips and cracks that may occur on the uphill cuts and/or downslope side cast material following road installation.

BLM Field Manager Signature:

Shane DeForest Digitally signed by Shane DeForest
Date: 2025.11.03 12:42:59 -07'00'