

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

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

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

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

## TARDAEWETHER Kellen \* ODOE

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

Good morning Sue,

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

Kellen

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

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

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

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

Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol Street NE, 1st Floor

Salem, Oregon 97301

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

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

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

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

Thanks,

Sue McCarthy

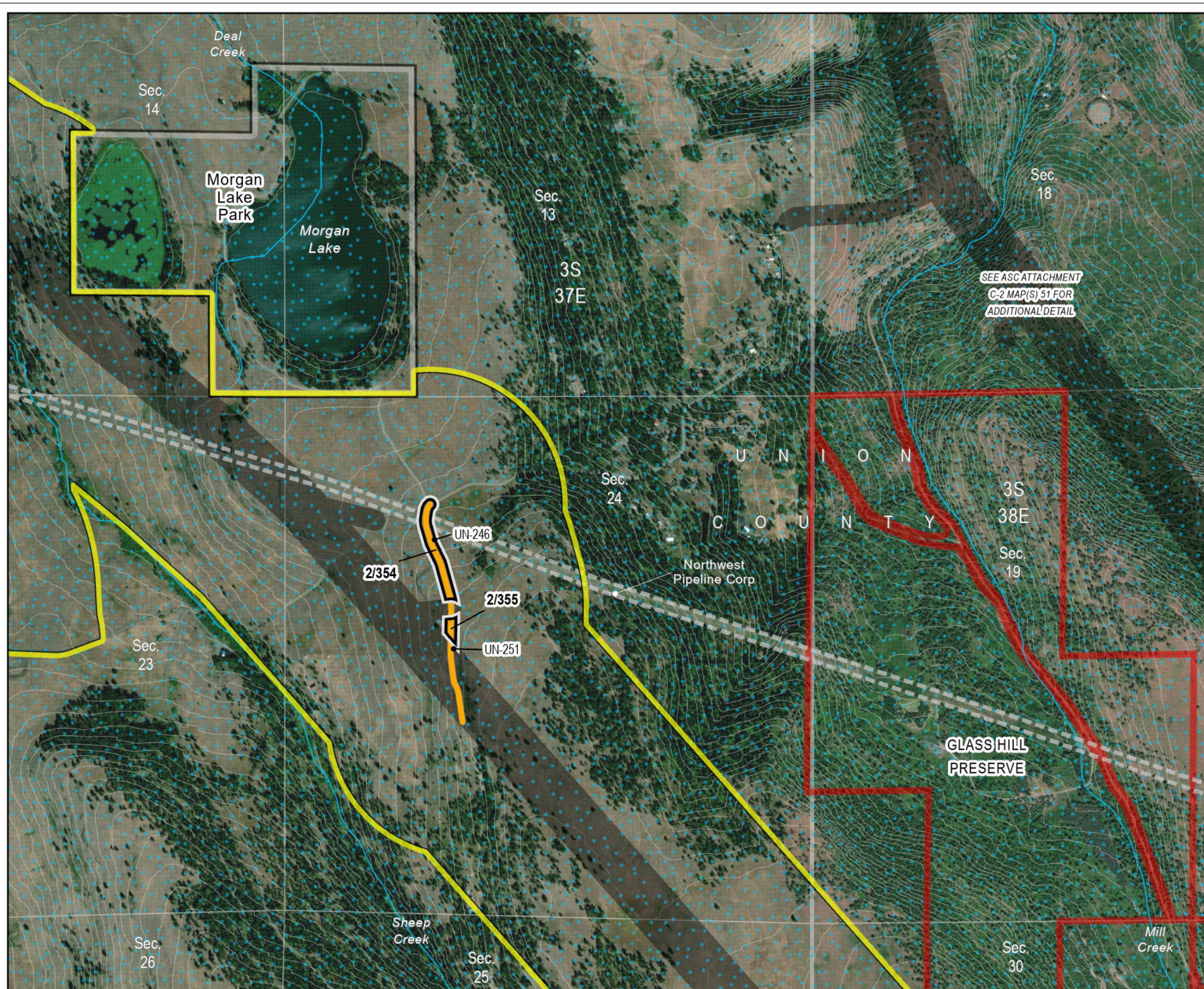
suemc@eoni.com

cell 541 786 0824

Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

Map 35



SEE ASC ATTACHMENT  
C-2 MAP(S) 51 FOR  
ADDITIONAL DETAIL

- |  |  |
|--|--|
| <b>Project Features</b>                                      | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary                                       | 20-ft Contours   |
| Proposed Micrositing Area Addition                           | Pipeline   |
| Previously Approved Micrositing Area                         | Stream   |
| <b>Access (Unique ID)</b>                                    | Morgan Lake Park                                       |
| Existing Road, Substantial Modification, 21-70% Improvements | Protected Area (EFSC)                                  |
|  | Elk Winter Range                                       |
|  | <b>Land Status</b>                                     |
|  | Private  |

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

Project features current as of December 5, 2023.

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

**Imagery:**  
World Imagery: Maxar



1,000  
Feet



## TARDAEWETHER Kellen \* ODOE

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

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

Oregon Department of Energy,

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

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

Thanks,  
sue mccarthy  
[suemc@eoni.com](mailto:suemc@eoni.com)  
cell 541 786 0824

## TARDAEWETHER Kellen \* ODOE

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

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

Kellen



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



Stay connected!

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

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

So it's literally going through my entire property?

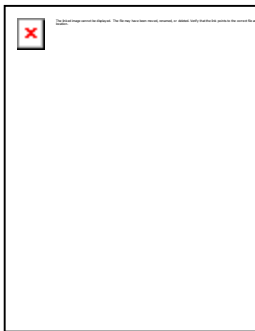
On Fri, Apr 26, 2024, 9:11 AM TARDAEWETHER Kellen \* ODOE  
<[kellen.tardaewether@energy.oregon.gov](mailto:kellen.tardaewether@energy.oregon.gov)> wrote:

Good morning Amanda,

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

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

Kellen



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

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



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

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

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

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

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

Thank you

Amanda Baker



## **TARDAEWETHER Kellen \* ODOE**

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

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

To: Kellen Tardaewether

Date: April 26, 2024

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

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

#### ISSUE STATEMENT:

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

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

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

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

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

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

It is also not consistent with the Oregon Supreme Court ruling in Stop B2H Coalition v. Dept of Energy, Pages 803-804. The court concluded that “EFSC (1) had authority to grant limited party status to Stop B2H and (2) **considered the factors it was required to consider in making that determination.**”

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

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

## TARDAEWETHER Kellen \* ODOE

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

Kellen:

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

Thans very much.

Irene

To: Kellen Tardaewether

Date: 5/8/24

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

Kellen:

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

#### COMMENT

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

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

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

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

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

Quai-Judicial Procedures Ch. 17

**17.24.200 Evidence.**

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

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

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

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

ORS 197.797.(9)(b)

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

**ORS 183.450(1) Evidence in contested cases.**

:

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

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

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

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

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

And

**ORS 469.370(2)(e) and ORS 469,370(3)**

**“ORS270(2)(e)**

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

**ORS 270(3)**

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

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



## SUMMARY

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

### CHANGE NEEDED TO COMPY WITH OREGON LAW REGARDING EVIDENCE:

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

Comment Submitted by:

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

2310 Adams Ave.

La Grande, Oregon 97850

Email: ott.irene@frontier.com

## TARDAEWETHER Kellen \* ODOE

---

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

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

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

Thank you. Tamra

---

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

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

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Good morning Tamra,

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

Please note:

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

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

Kellen



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



Stay connected!

---

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

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

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

Hi Tamra,

Here is the letter to ODOE for B2H.

And thank you for the note about my sandals 😊

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



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 Roy Drago Jr., Commissioner

May 15, 2024

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

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

Dear Ms. Tardaewether:

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

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

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

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

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

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

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

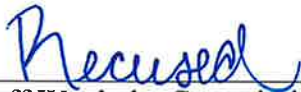
Sincerely,

MORROW COUNTY BOARD OF COMMISSIONERS



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David Sykes, Chair



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Jeff Wenholz, Commissioner



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Roy Drago Jr., Commissioner

**Enclosures:**

**Encl. 1—Applicable IPC Site Boundary Change Maps**

**Encl. 2—Applicable IPC Proposed Micrositing Area Additions Maps**

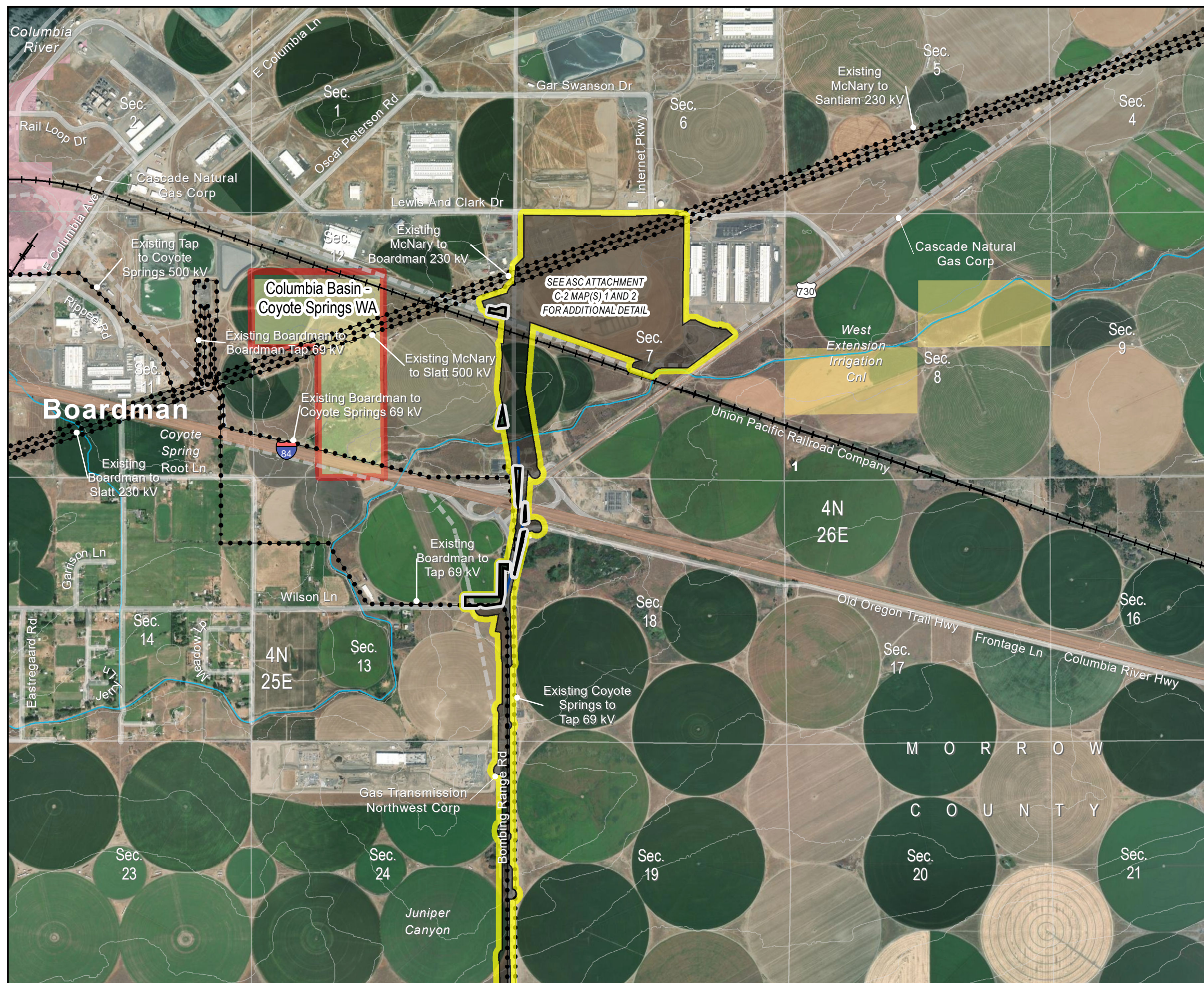
**cc: Eric Imes, Morrow County Public Works Director**

Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1  
Proposed Site Boundary**

Morrow

Map 1



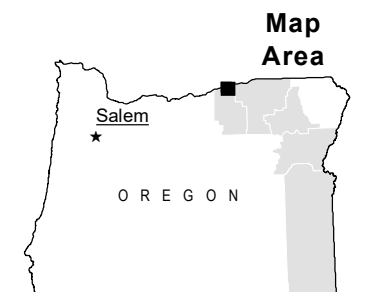
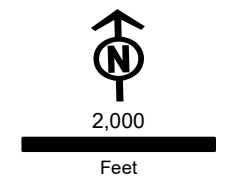
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|-------------------------|--|--|----------------------------|
| <b>Project Features</b> |  | <b>Important Siting Constraints and Other Features</b> |                            |
|                         | Proposed Site Boundary                     |  | 20-ft Contours             |
|                         | Proposed Micrositing Area Addition         |  | Existing Transmission Line |
|                         | Previously Approved Micrositing Area       |  | Pipeline                   |
| <b>Land Status</b>      |  |  | Stream                     |
|                         | Bureau of Land Management                  |  | Interstate                 |
|                         | Bureau of Reclamation                      |  | Highways                   |
|                         | Military Reservation or Corps of Engineers |  | Public Roads               |
|                         | Other Federal                              |  | Protected Area (EFSC)      |
|                         | Private                                    |  | Railroad                   |

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

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

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

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



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1  
Proposed Site Boundary**

Umatilla  
Map 2



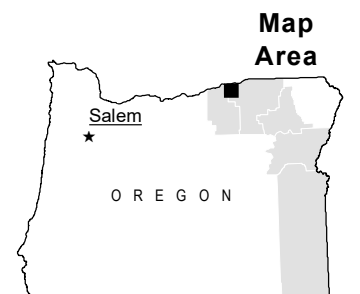
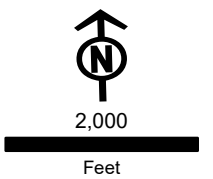
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|--|---|
| <b>Project Features</b>                    | <b>Important Siting Constraints and Other Features</b>  |
| Proposed Site Boundary                     | 20-ft Contours  |
| Proposed Micrositing Area Addition         | Existing Transmission Line                              |
| Previously Approved Micrositing Area       | Pipeline  |
| <b>Land Status</b>                         | Stream  |
| Bureau of Land Management                  | Interstate  |
| Military Reservation or Corps of Engineers | Public Roads  |
| Private                                    | Railroad  |
|  | Airport Controlled Airspace (Height Restrictions Apply) |

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

Project features current as of March 9, 2023.

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

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














Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1  
Proposed Site Boundary**

Morrow

**Map 3**

- Project Features**
-  Proposed Site Boundary
  -  Previously Approved Micrositing Area
- Land Status**
-  Military Reservation or Corps of Engineers
  -  Private
  -  State or Local

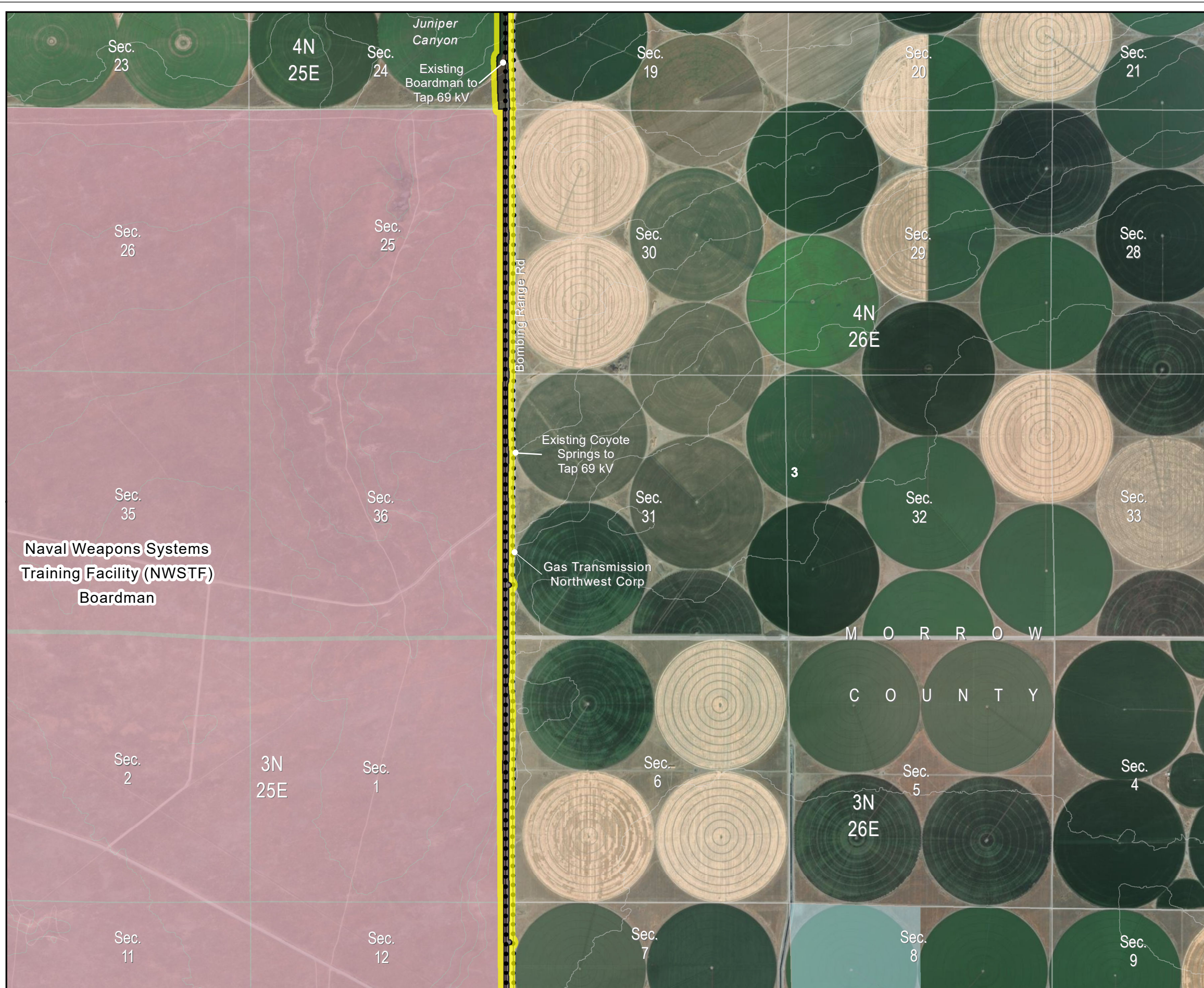
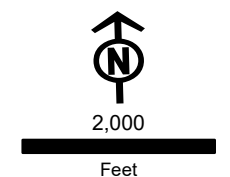
- Important Siting Constraints and Other Features**
-  20-ft Contours
  -  Existing Transmission Line
  -  Pipeline
  -  Public Roads

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

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

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

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

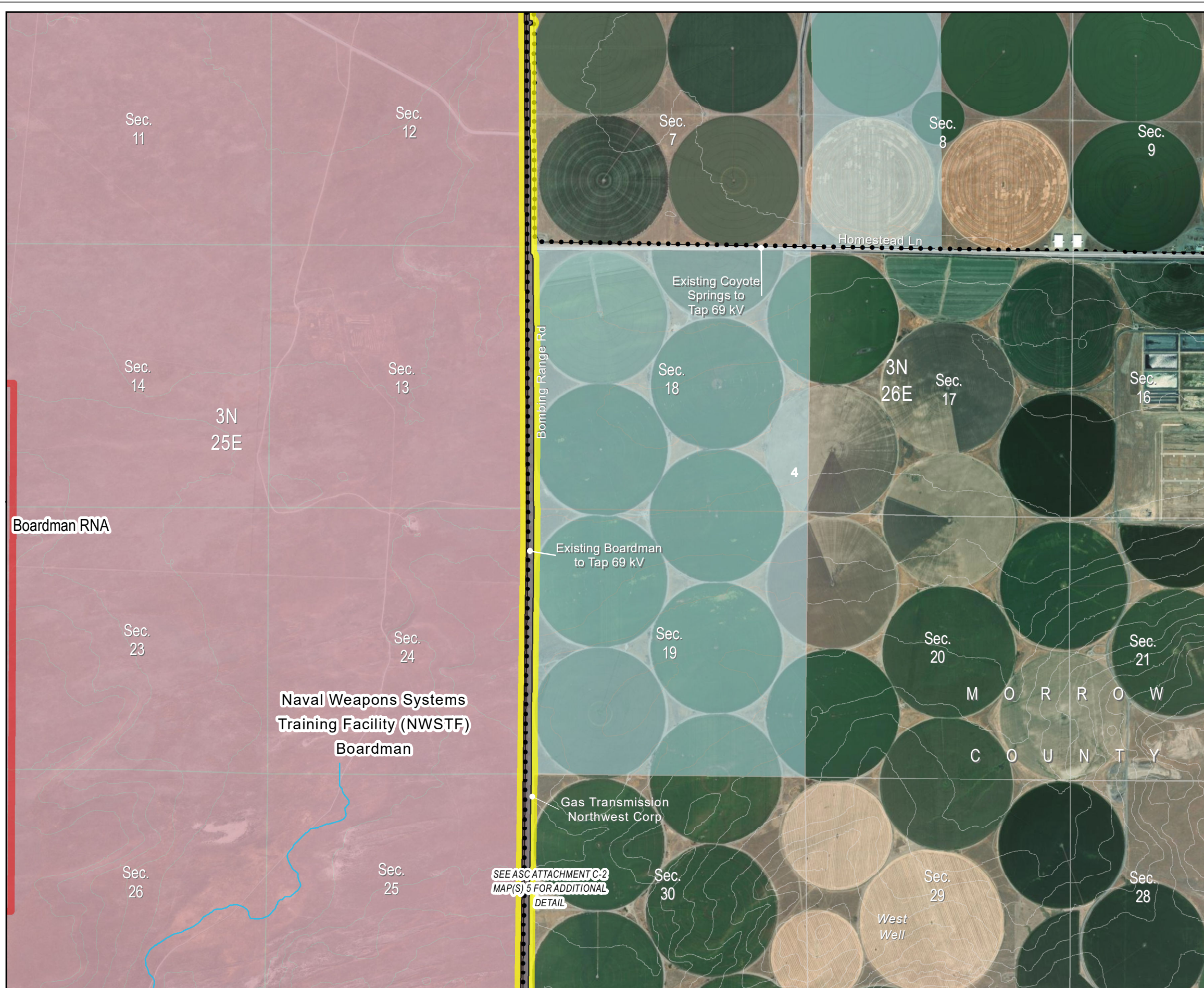


Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1**  
**Proposed Site Boundary**

Morrow

**Map 4**



- Project Features**
- Proposed Site Boundary
  - Previously Approved Micrositing Area
- Land Status**
- Military Reservation or Corps of Engineers
  - Private
  - State or Local

- Important Siting Constraints and Other Features**
- 20-ft Contours
  - Existing Transmission Line
  - Pipeline
  - Stream
  - Public Roads
  - Protected Area (EFSC)

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

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

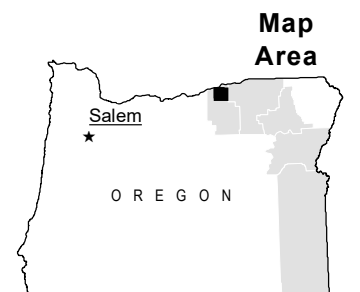
**Data Source(s):**  
BLM, Esri, FAA, NPS, ODFW, ODOT, StreamNet, USGS, Velocity, Ventyx

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



2,000

Feet



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1  
Proposed Site Boundary**

Morrow

Map 5

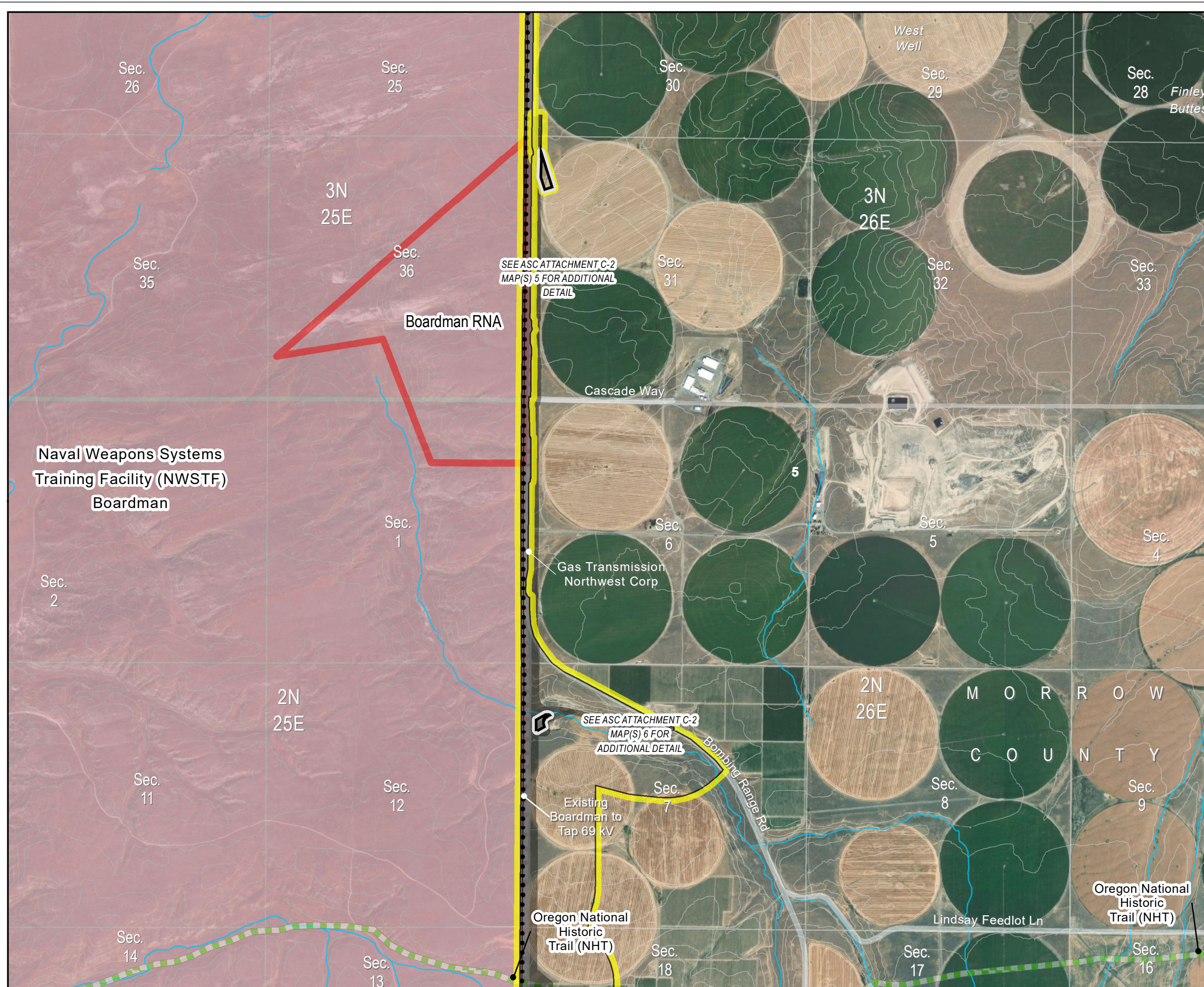
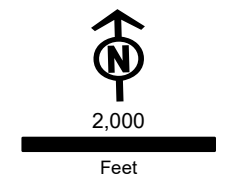
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|--|--|
| <b>Project Features</b>                    | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary                     | 20-ft Contours   |
| Proposed Micrositing Area Addition         | Existing Transmission Line                             |
| Previously Approved Micrositing Area       | Pipeline   |
| <b>Land Status</b>                         | Stream   |
| Military Reservation or Corps of Engineers | Oregon National Historic Trail (NHT)                   |
| Private                                    | Public Roads   |
|  | Protected Area (EFSC)                                  |

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

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

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

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

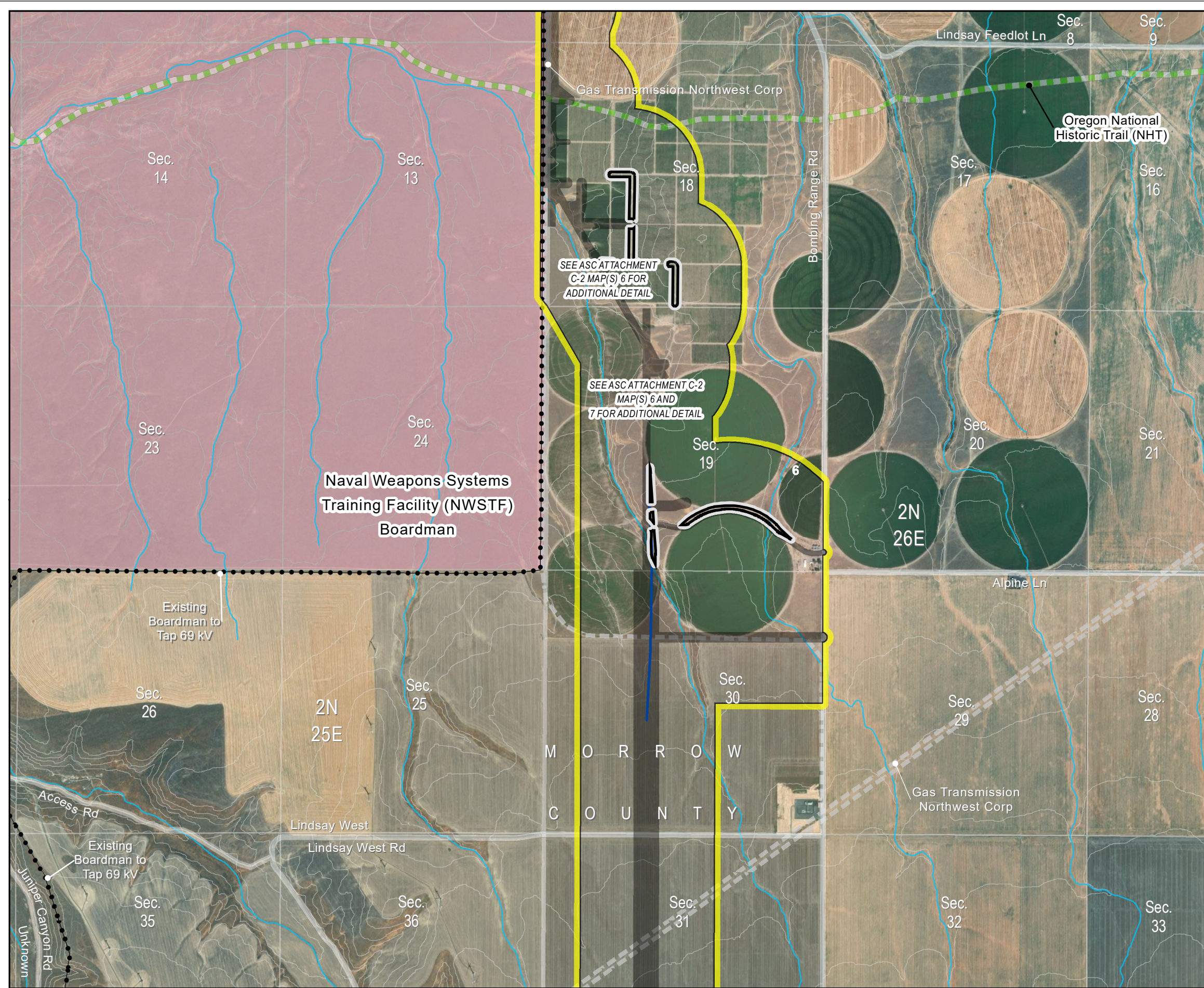


Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1**  
**Proposed Site Boundary**

Morrow

**Map 6**



**Project Features**

- Proposed Site Boundary
- Previously Approved Micrositing Area
- Military Reservation or Corps of Engineers
- Private

**Important Siting Constraints and Other Features**

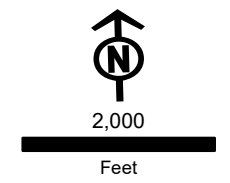
- 20-ft Contours
- Existing Transmission Line
- Pipeline
- Stream
- Oregon National Historic Trail (NHT)
- Public Roads

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

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

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

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

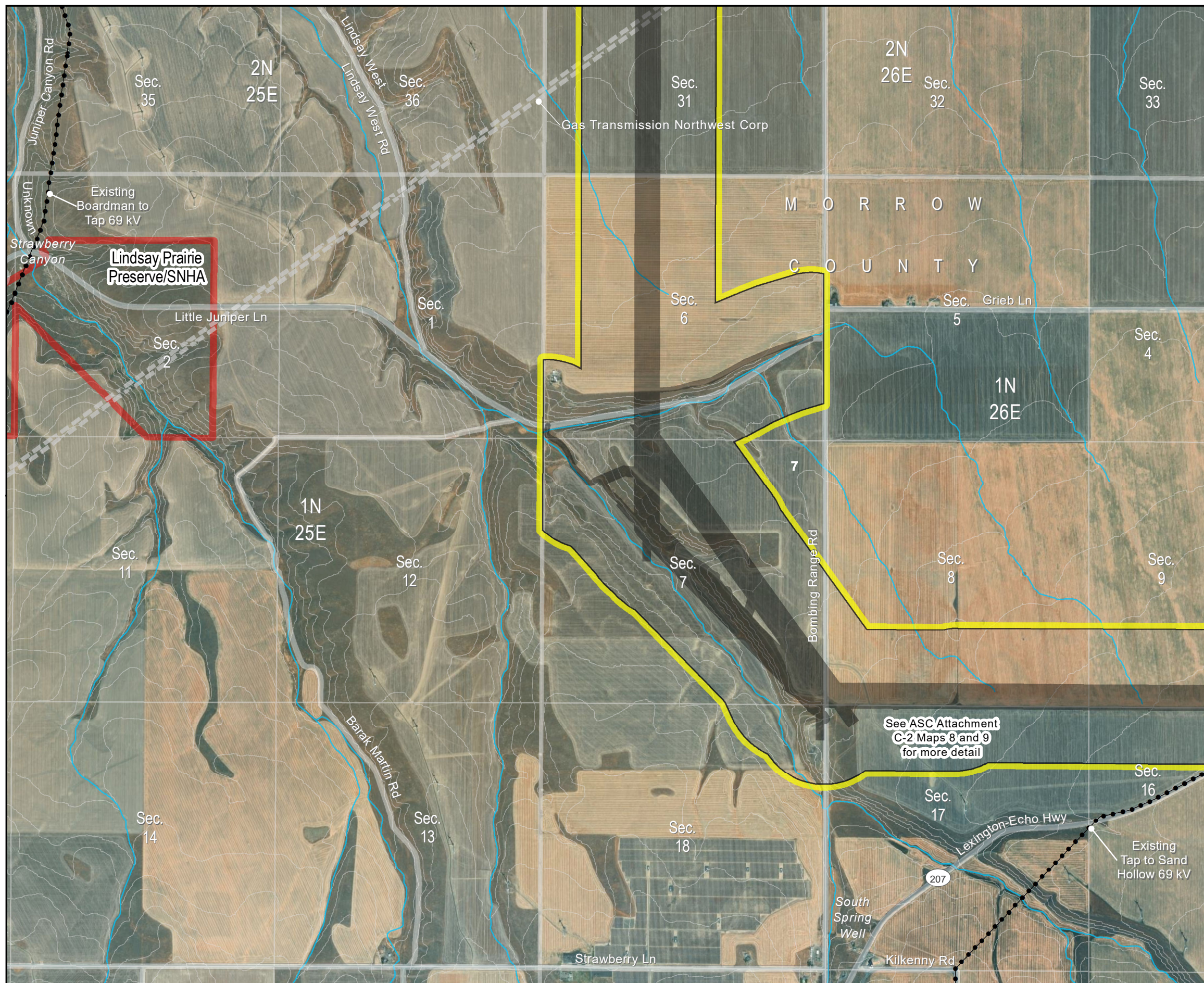


Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1  
Proposed Site Boundary**

Morrow

Map 7



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

- Important Siting Constraints and Other Features**
- 20-ft Contours
  - Existing Transmission Line
  - Pipeline
  - Stream
  - Public Roads
  - Protected Area (EFSC)

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

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

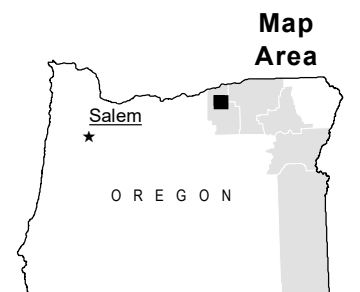
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BLM, Esri, FAA, NPS, ODFW, ODOT, StreamNet, USGS, Velocity, Ventyx

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



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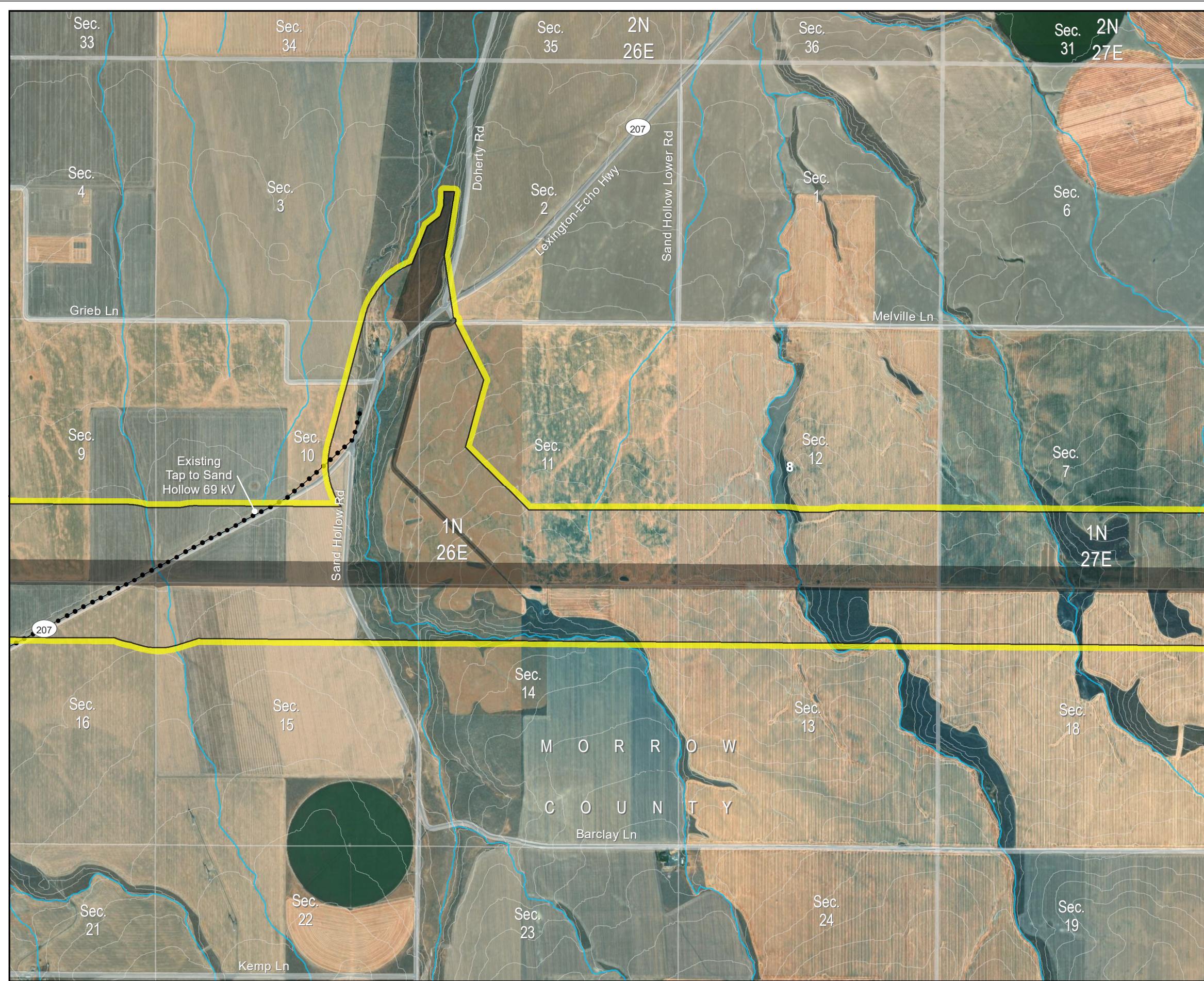
Feet



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1  
Proposed Site Boundary**

Morrow  
Map 8



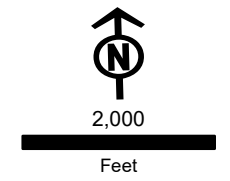
- |                                      |  |
|--------------------------------------|--|
| <b>Project Features</b>              | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary               | 20-ft Contours   |
| Previously Approved Micrositing Area | Existing Transmission Line                             |
| <b>Land Status</b>                   | Stream   |
| Private                              | Public Roads   |

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

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

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

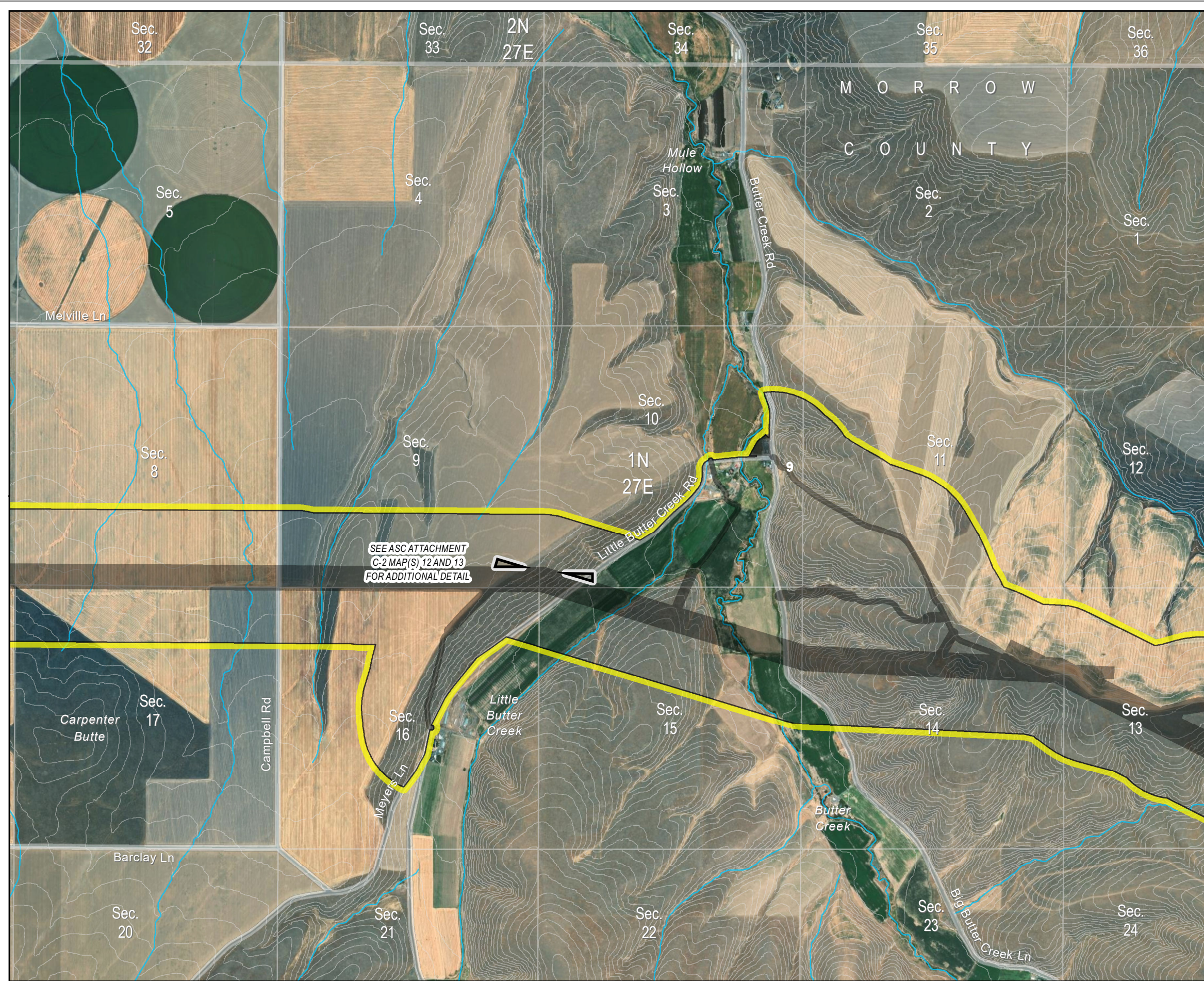
**Imagery:**  
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1  
Proposed Site Boundary**

Morrow  
Map 9



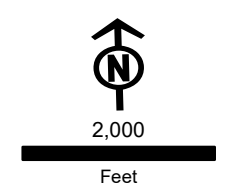
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|-------------------------|--------------------------------------|--|----------------|
| <b>Project Features</b> |                                      | <b>Important Siting Constraints and Other Features</b> |                |
|                  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

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

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

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

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

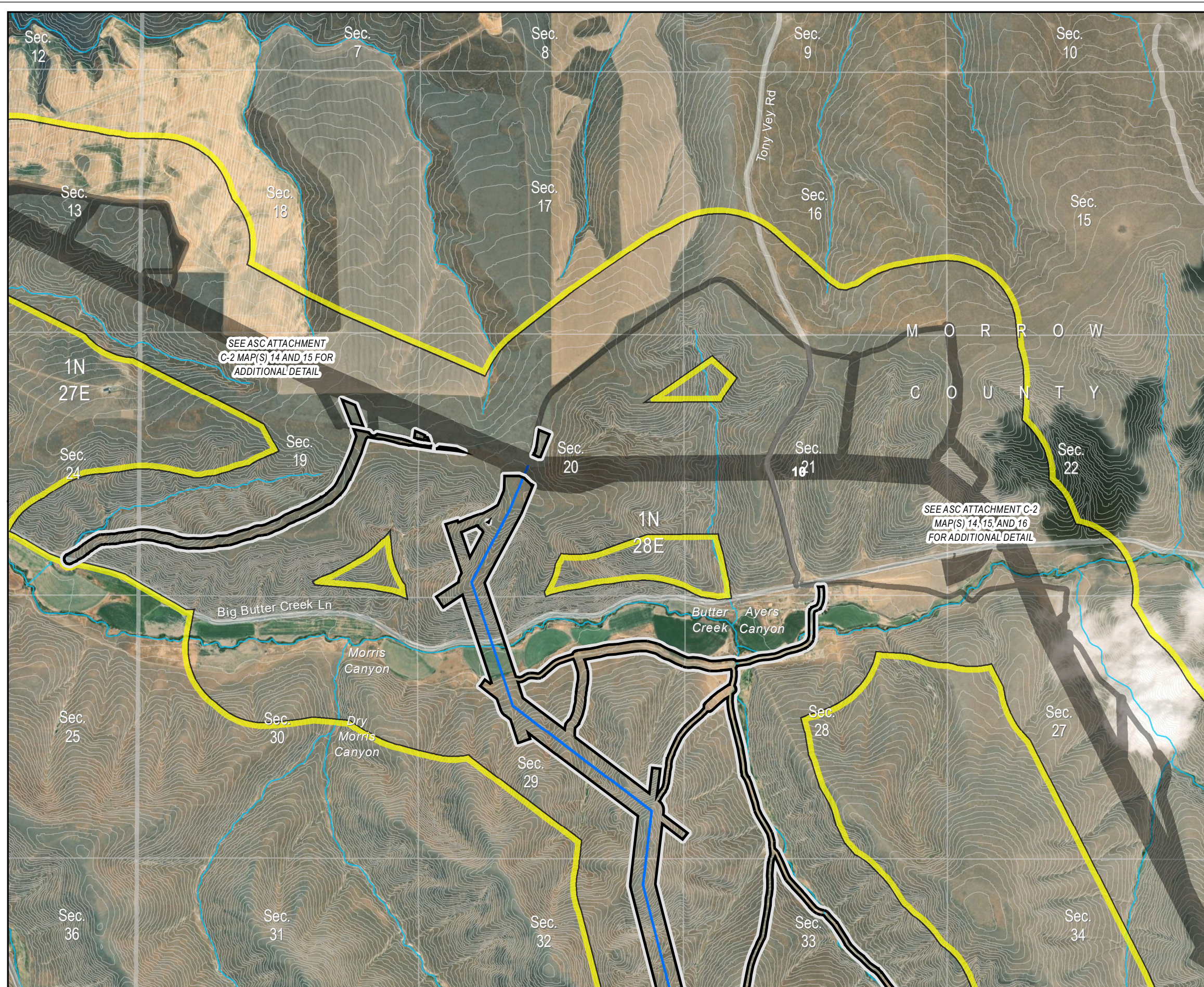


Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1  
Proposed Site Boundary**

Morrow

Map 10



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

- Important Siting Constraints and Other Features**
- 20-ft Contours
  - Stream
  - Public Roads

SEE ASC ATTACHMENT C-2 MAP(S) 14 AND 15 FOR ADDITIONAL DETAIL

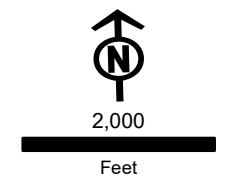
SEE ASC ATTACHMENT C-2 MAP(S) 14, 15, AND 16 FOR ADDITIONAL DETAIL

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

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

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

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








Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1**  
**Proposed Site Boundary**

Morrow

Map 11



**Project Features**

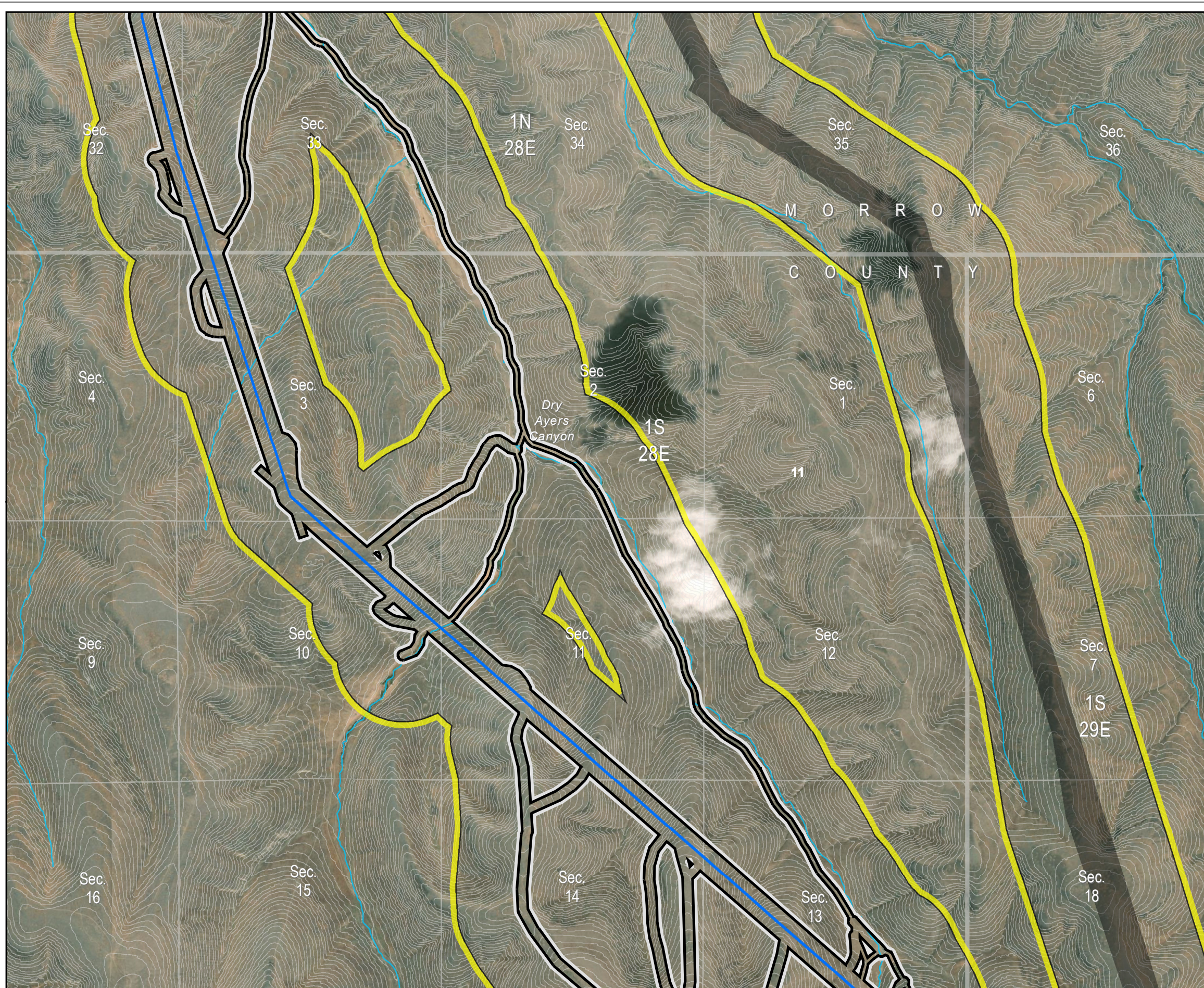
-  Proposed Site Boundary
-  Proposed Micrositing Area Addition
-  Previously Approved Micrositing Area

**Land Status**

-  Private

**Important Siting Constraints and Other Features**

-  20-ft Contours
-  Stream



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

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

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

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



2,000

Feet

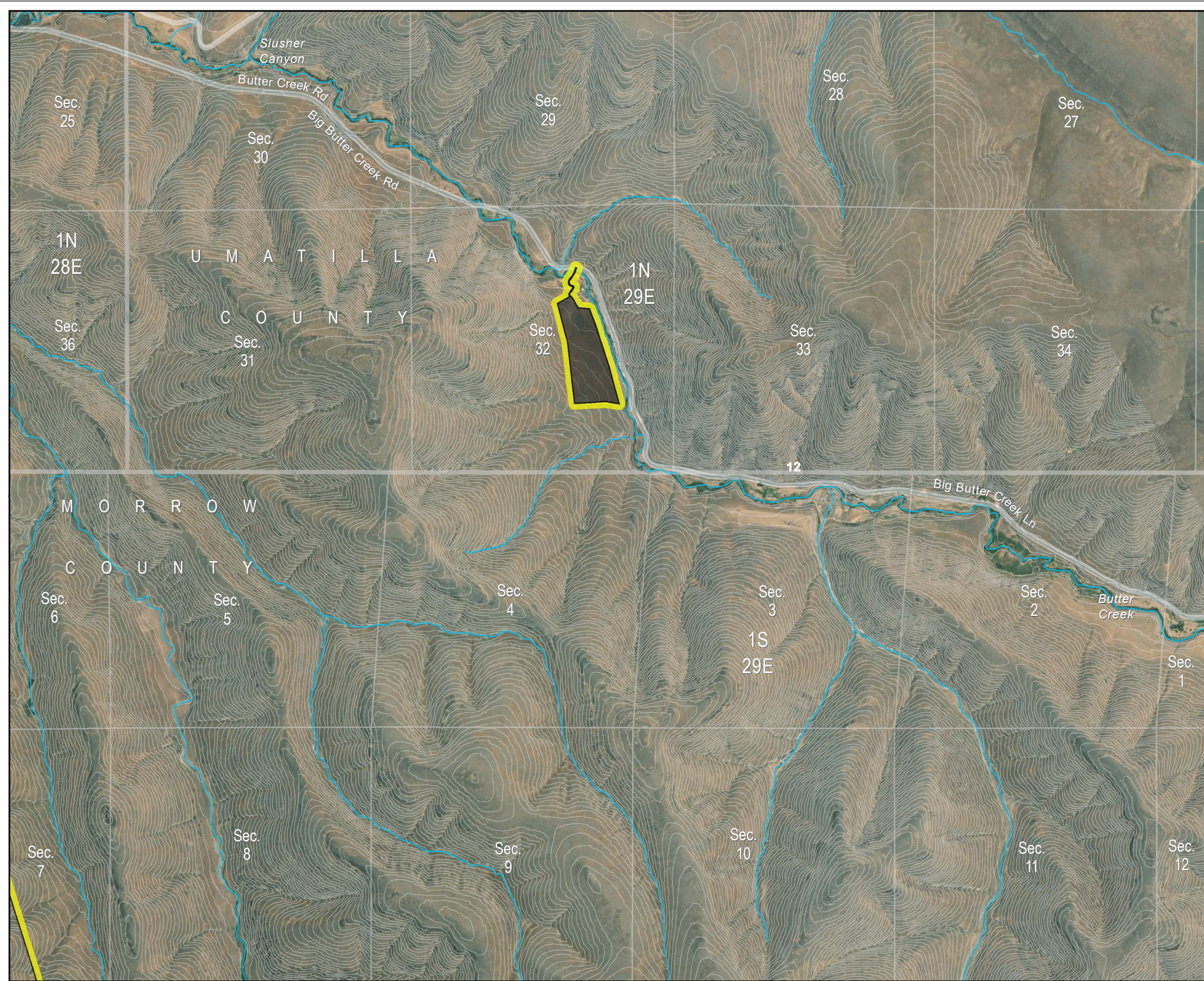
**Map Area**



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1**  
**Proposed Site Boundary**

Morrow  
Map 12



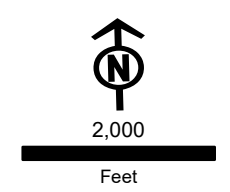
- |                                      |  |
|--------------------------------------|--|
| <b>Project Features</b>              | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary               | 20-ft Contours   |
| Previously Approved Micrositing Area | Stream   |
|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

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

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

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

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

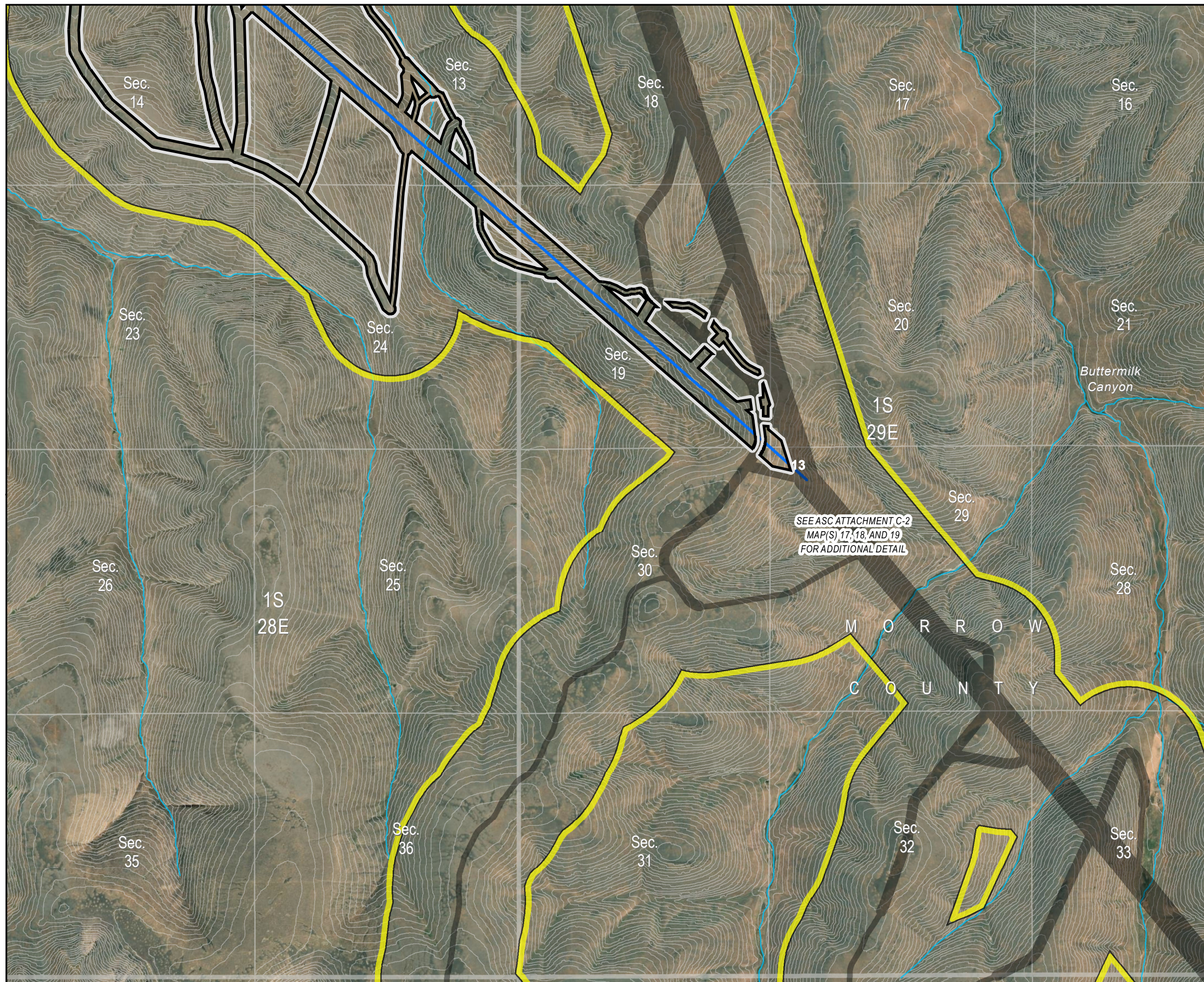


Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1**  
**Proposed Site Boundary**

Morrow

Map 13



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

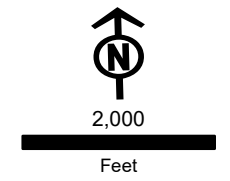
- Important Siting Constraints and Other Features**
- 20-ft Contours
  - Stream

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

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

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

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

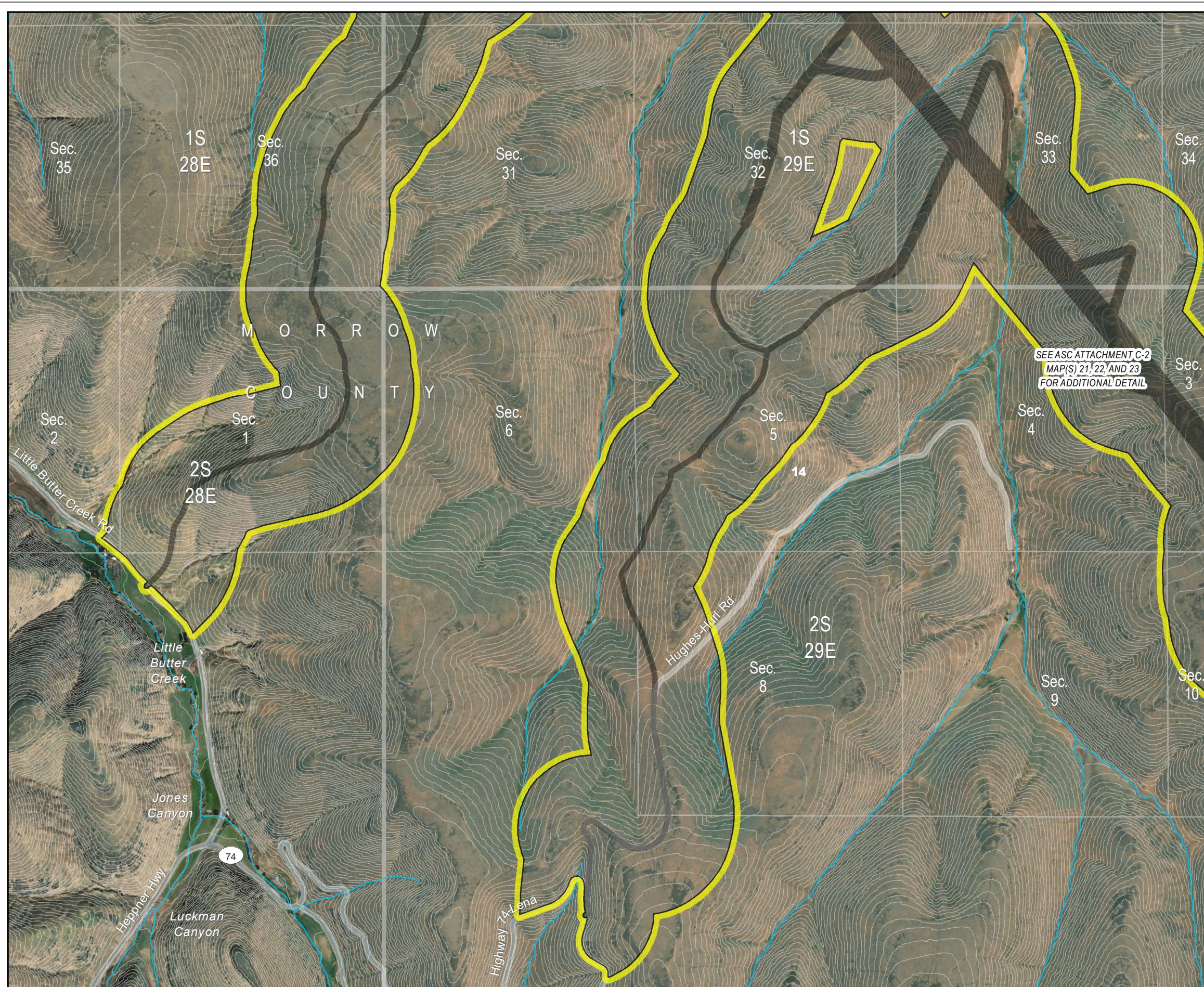


Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1**  
**Proposed Site Boundary**

Morrow

Map 14



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

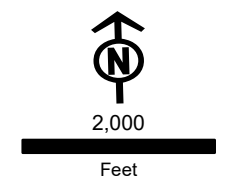
- Important Siting Constraints and Other Features**
- 20-ft Contours
  - Stream
  - Public Roads

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

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

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

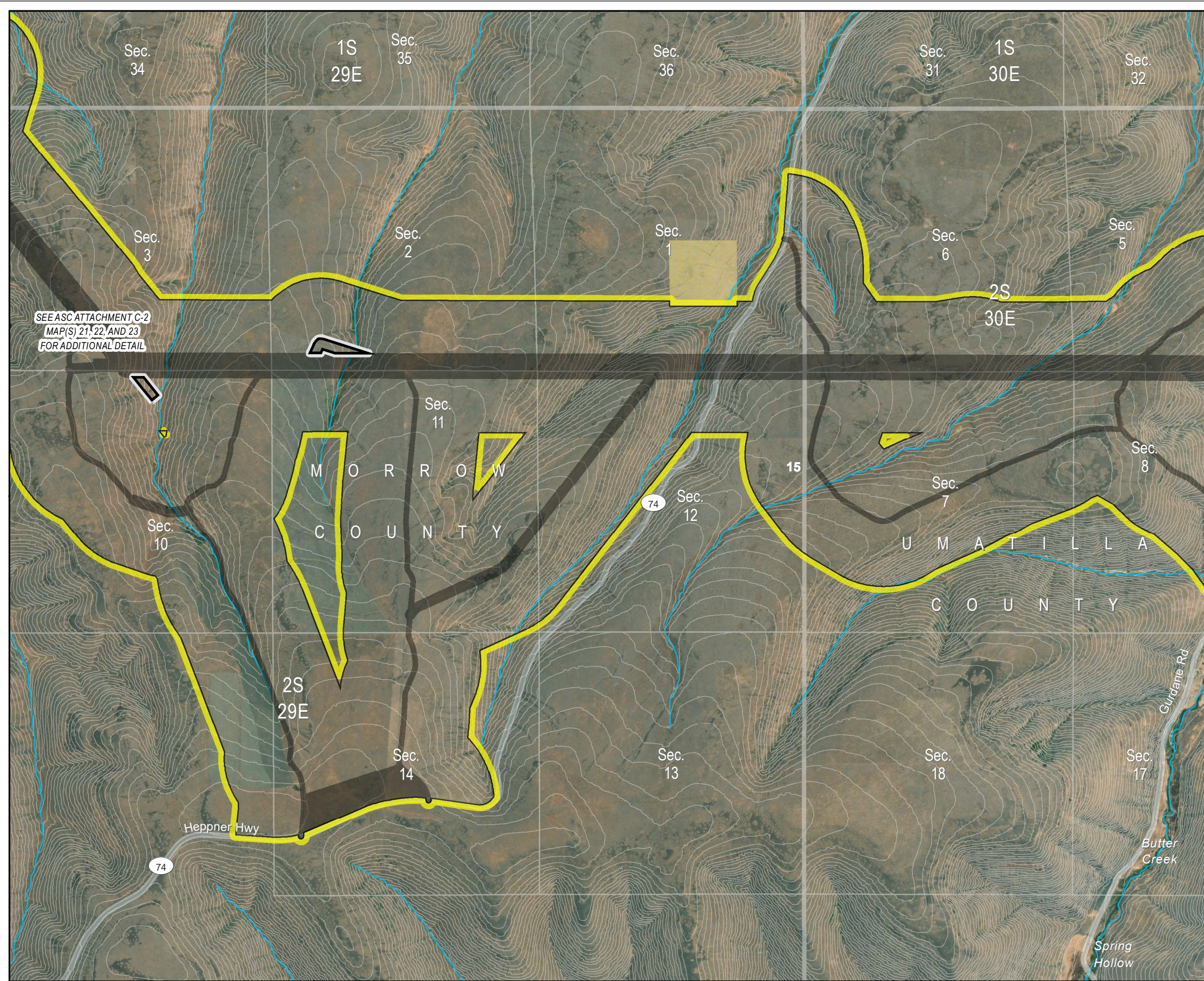
**Imagery:**  
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

**Figure 8-1  
Proposed Site Boundary**

Morrow  
Map 15



SEE ASC ATTACHMENT C-2  
MAP(S) 21, 22, AND 23  
FOR ADDITIONAL DETAIL

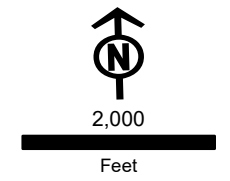
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|-------------------------|--------------------------------------|--|----------------|
| <b>Project Features</b> |                                      | <b>Important Siting Constraints and Other Features</b> |                |
|                         | Proposed Site Boundary               |  | 20-ft Contours |
|                         | Proposed Micrositing Area Addition   |  | Stream         |
|                         | Previously Approved Micrositing Area |  | Public Roads   |
| <b>Land Status</b>      |                                      |  |                |
|                         | Bureau of Land Management            |  |                |
|                         | Private                              |  |                |

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

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

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

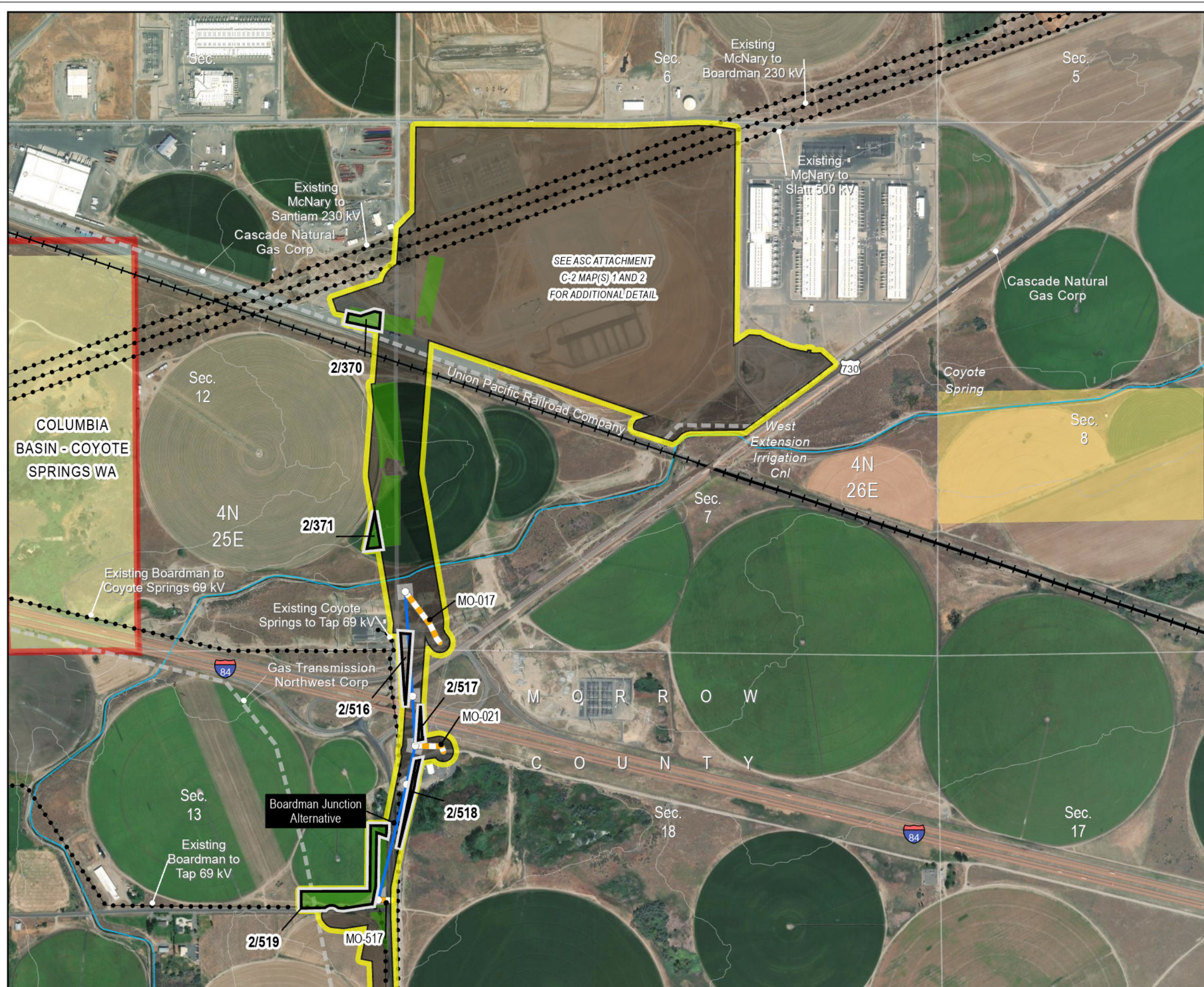
**Imagery:**  
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

Map 1



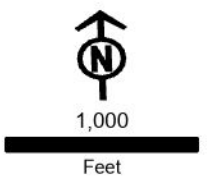
- |                                      |  |
|--------------------------------------|--|
| <b>Project Features</b>              | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary               | 20-ft Contours   |
| Proposed Micrositing Area Addition   | Existing Transmission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

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

**Project features current as of December 5, 2023.**

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

**Imagery:**  
World Imagery: Maxar



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

**Map 2**



- |                                      |                               |
|--------------------------------------|-------------------------------|
| <b>Project Features</b>              | ●● Existing Transmission Line |
| ▭ Proposed Site Boundary             | — Pipeline                    |
| ▭ Proposed Micrositing Area Addition | ~ Stream                      |
| <b>Work Areas</b>                    | — Interstate                  |
| ▭ Multi-Use Area                     | — Railroad                    |
|                                      | Land Status                   |
|                                      | ▭ Private                     |

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

Project features current as of December 5, 2023.

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

**Imagery:**  
World Imagery: Maxar



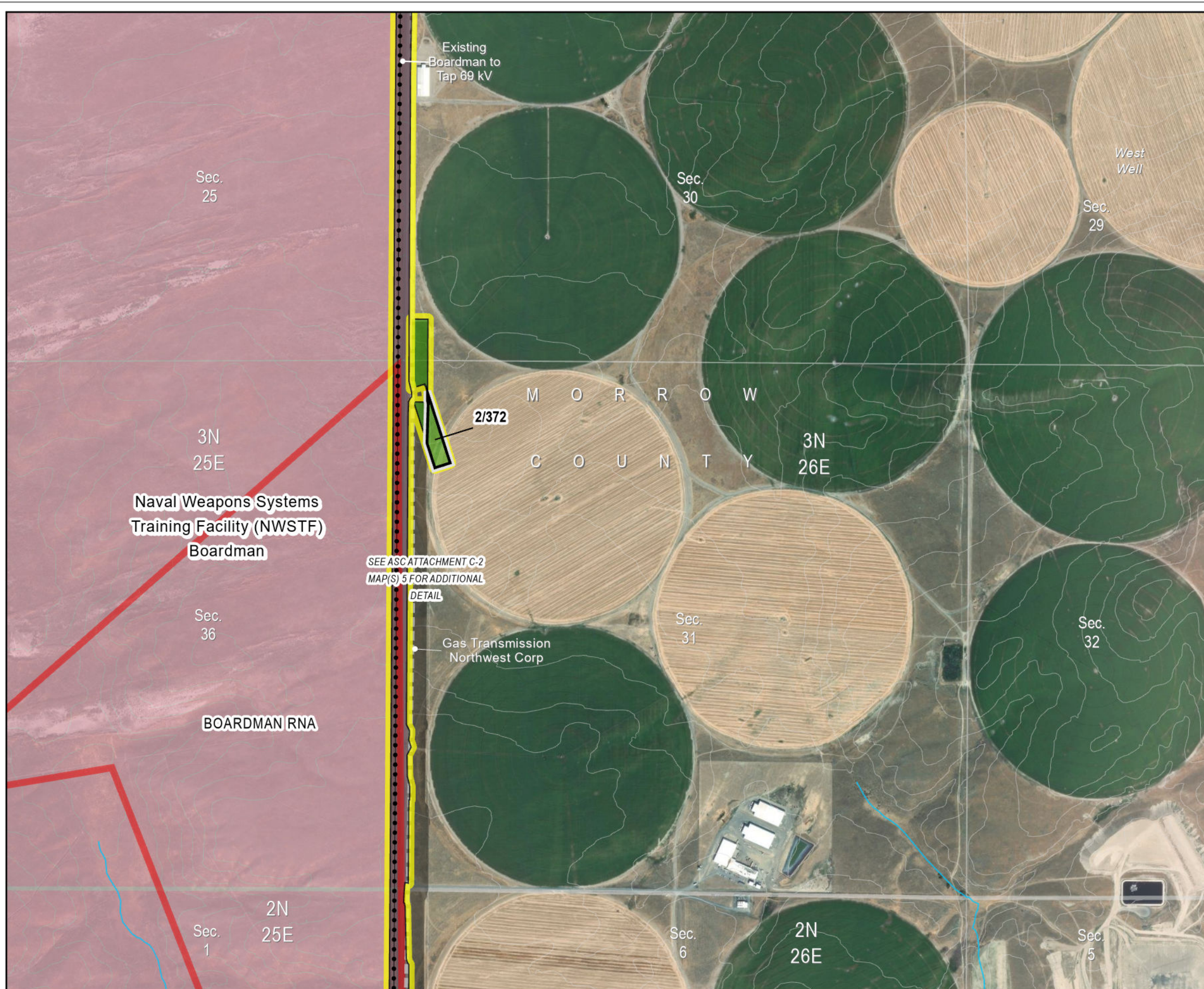
1,000  
Feet



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

**Map 3**



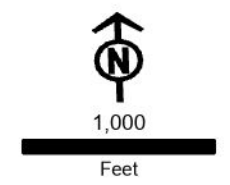
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|--------------------------------------|--|
| <b>Project Features</b>              | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary               | 20-ft Contours   |
| Proposed Micrositing Area Addition   | Existing Transmission Line                             |
| Previously Approved Micrositing Area | Pipeline   |
| <b>Work Areas</b>                    | Stream   |
| Pulling and Tensioning               | Protected Area (EFSC)                                  |
|                                      | <b>Land Status</b>                                     |
|                                      | Military Reservation or Corps of Engineers             |
|                                      | Private  |

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

Project features current as of December 5, 2023.

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

**Imagery:**  
World Imagery: Maxar

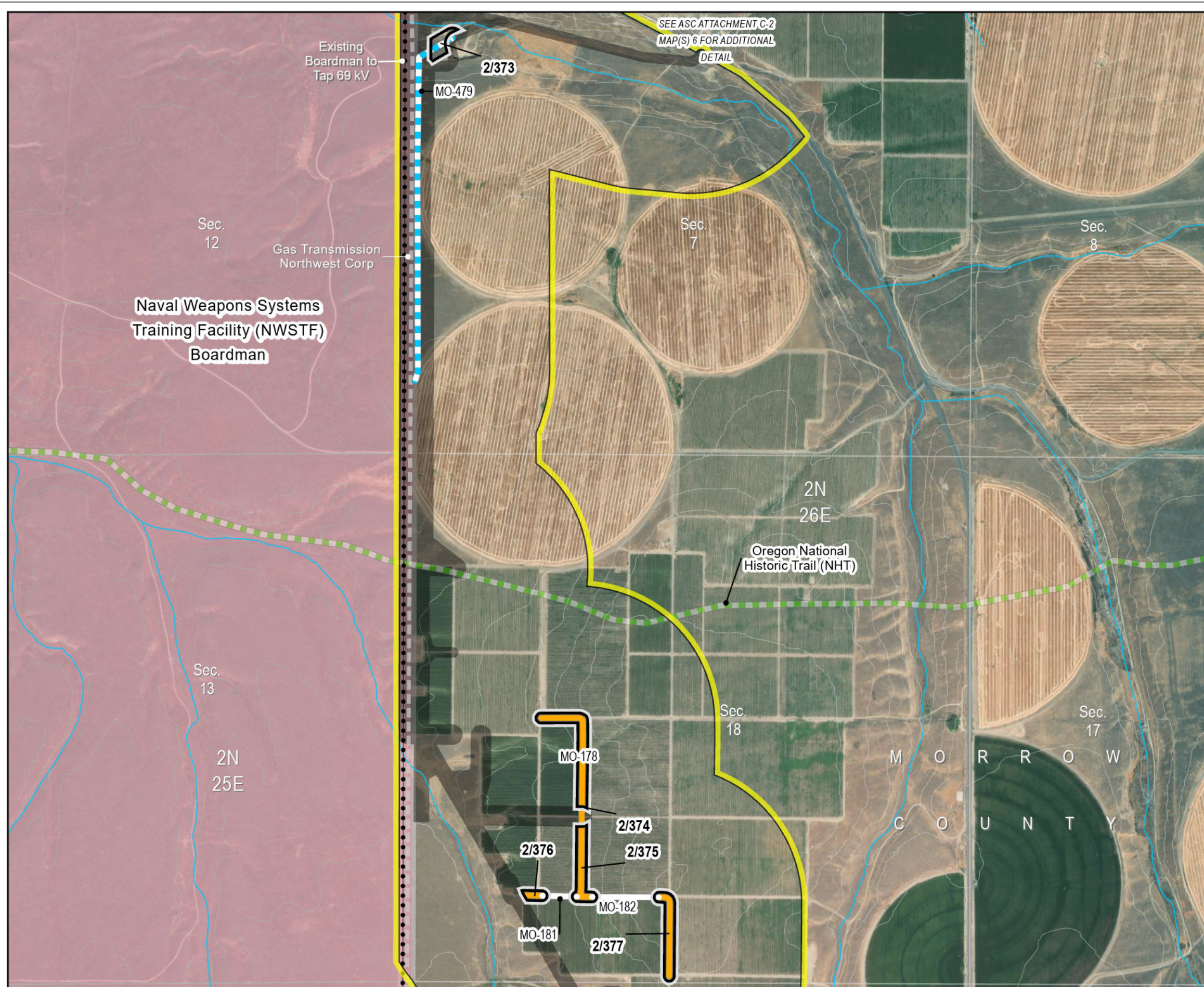




Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

Map 4



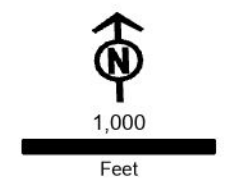
- |  |  |
|--|--|
| <b>Project Features</b>  | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary   | 20-ft Contours   |
| Proposed Micrositing Area Addition                             | Existing Transmission Line                             |
| Previously Approved Micrositing Area                           | Pipeline   |
| <b>Access (Unique ID)</b>                                      | Stream   |
| Existing Road, No Substantial Modification, 0-20% Improvements | Oregon National Historic Trail (NHT)                   |
| Existing Road, Substantial Modification, 21-70% Improvements   | <b>Land Status</b>                                     |
| New Road, Bladed   | Military Reservation or Corps of Engineers             |
|  | Private  |

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

**Project features current as of December 5, 2023.**

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

**Imagery:**  
World Imagery: Maxar

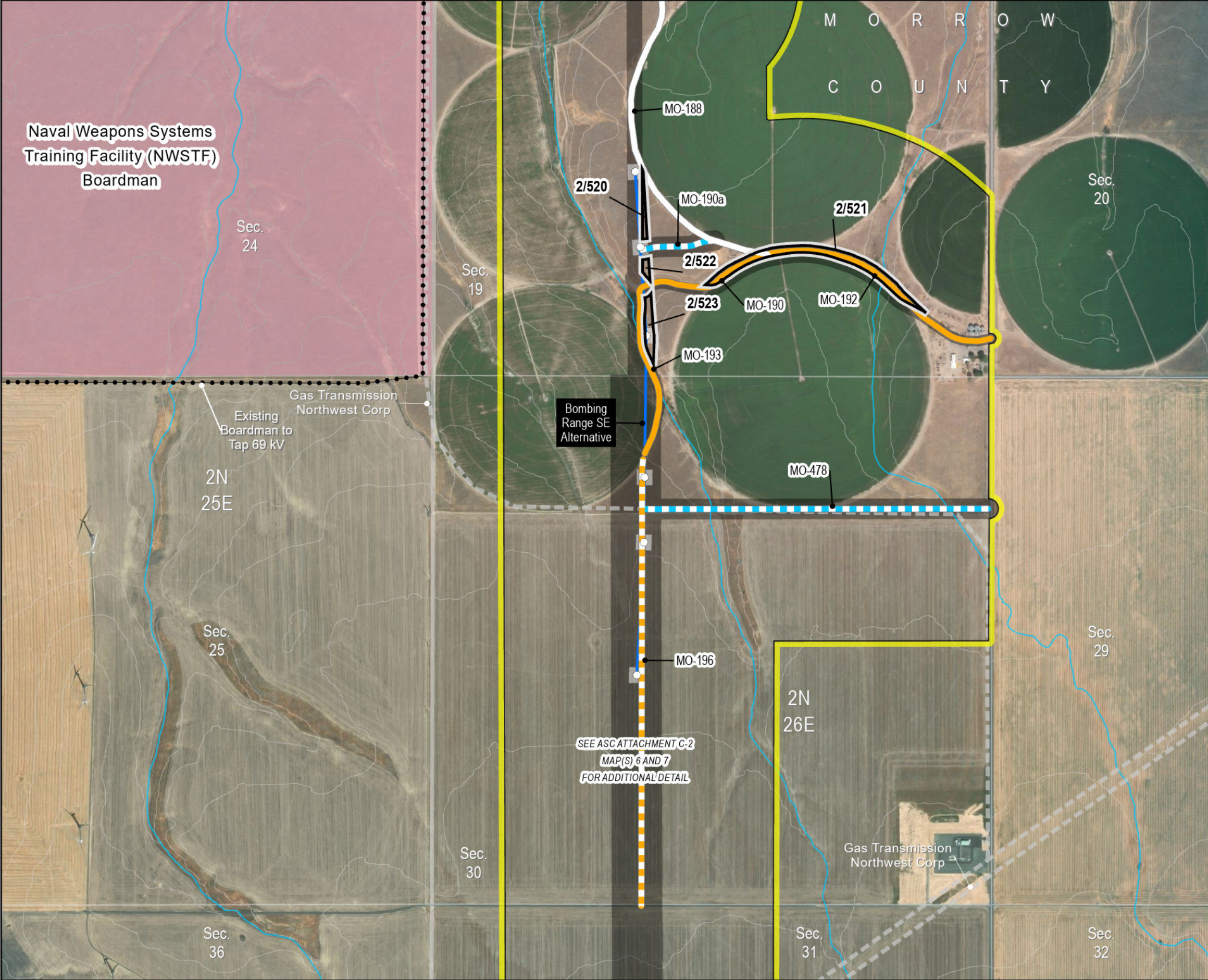


Naval Weapons Systems Training Facility (NWSTF) Boardman

Boardman to Hemingway Transmission Project  
Request for Amendment 2

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

Map 5



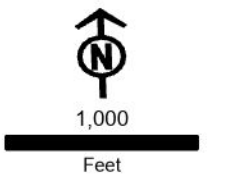
- Project Features**
- Proposed Site Boundary
  - Proposed Micrositing Area Addition
  - Previously Approved Micrositing Area
  - Towers\_RFA2
- Access (Unique ID)**
- Existing Road, No Substantial Modification, 0-20% Improvements
  - Existing Road, Substantial Modification, 21-70% Improvements
  - New Road, Bladed
  - New Road, Primitive
  - Transmission Centerline
- Work Areas**
- Structure Work Area
- Important Siting Constraints and Other Features**
- 20-ft Contours
  - Existing Transmission Line
  - Pipeline
  - Stream
- Land Status**
- Military Reservation or Corps of Engineers
  - Private

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

**Project features current as of December 5, 2023.**

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

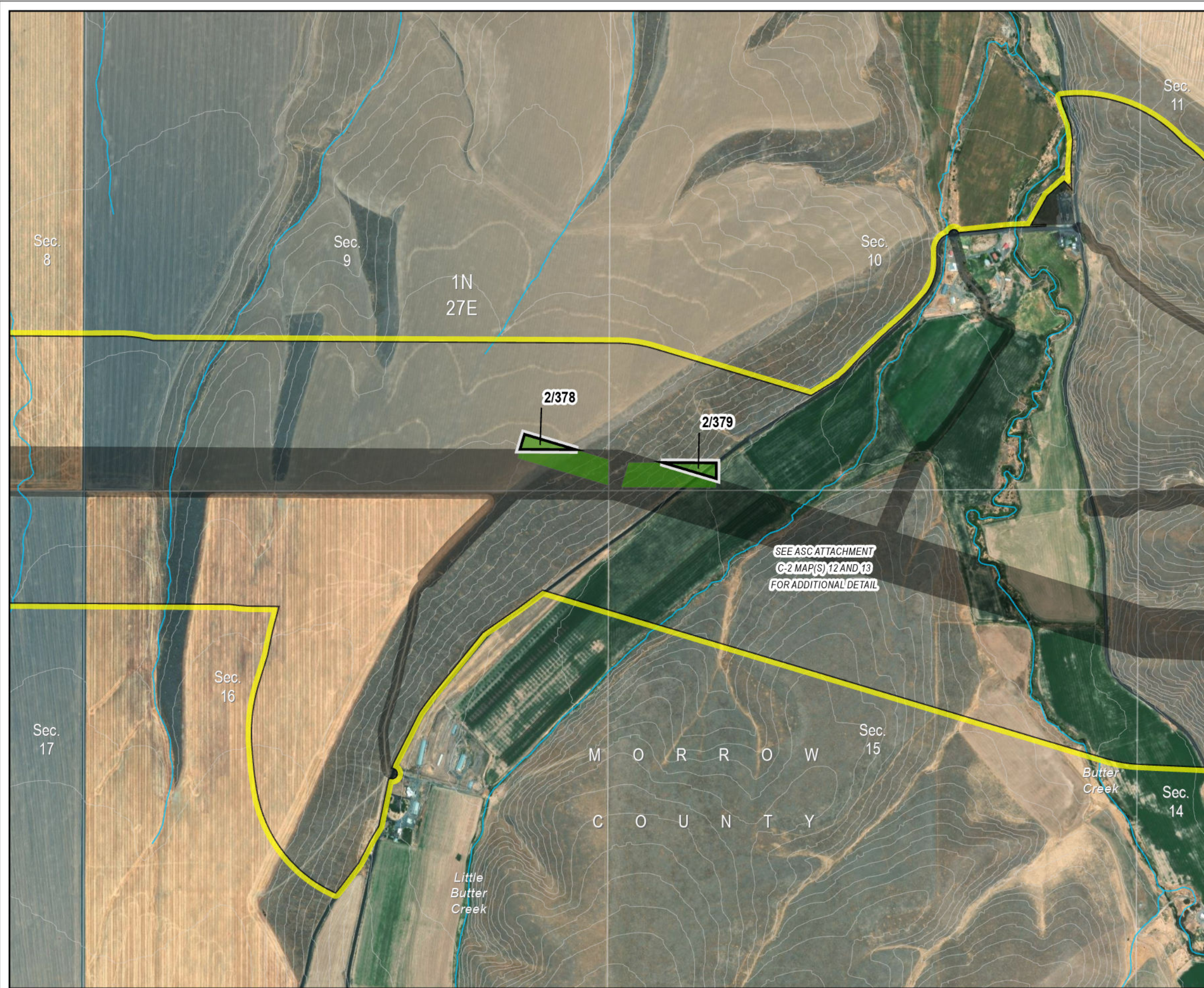
**Imagery:**  
World Imagery: Maxar



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

**Map 6**



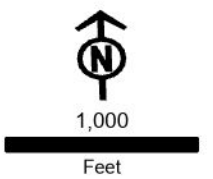
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| <b>Project Features</b>              | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary               | 20-ft Contours   |
| Proposed Micrositing Area Addition   | Stream   |
| Previously Approved Micrositing Area | <b>Land Status</b>                                     |
| Pulling and Tensioning               | Private  |
| <b>Work Areas</b>                    |  |
|                                      |  |

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

Project features current as of December 5, 2023.

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

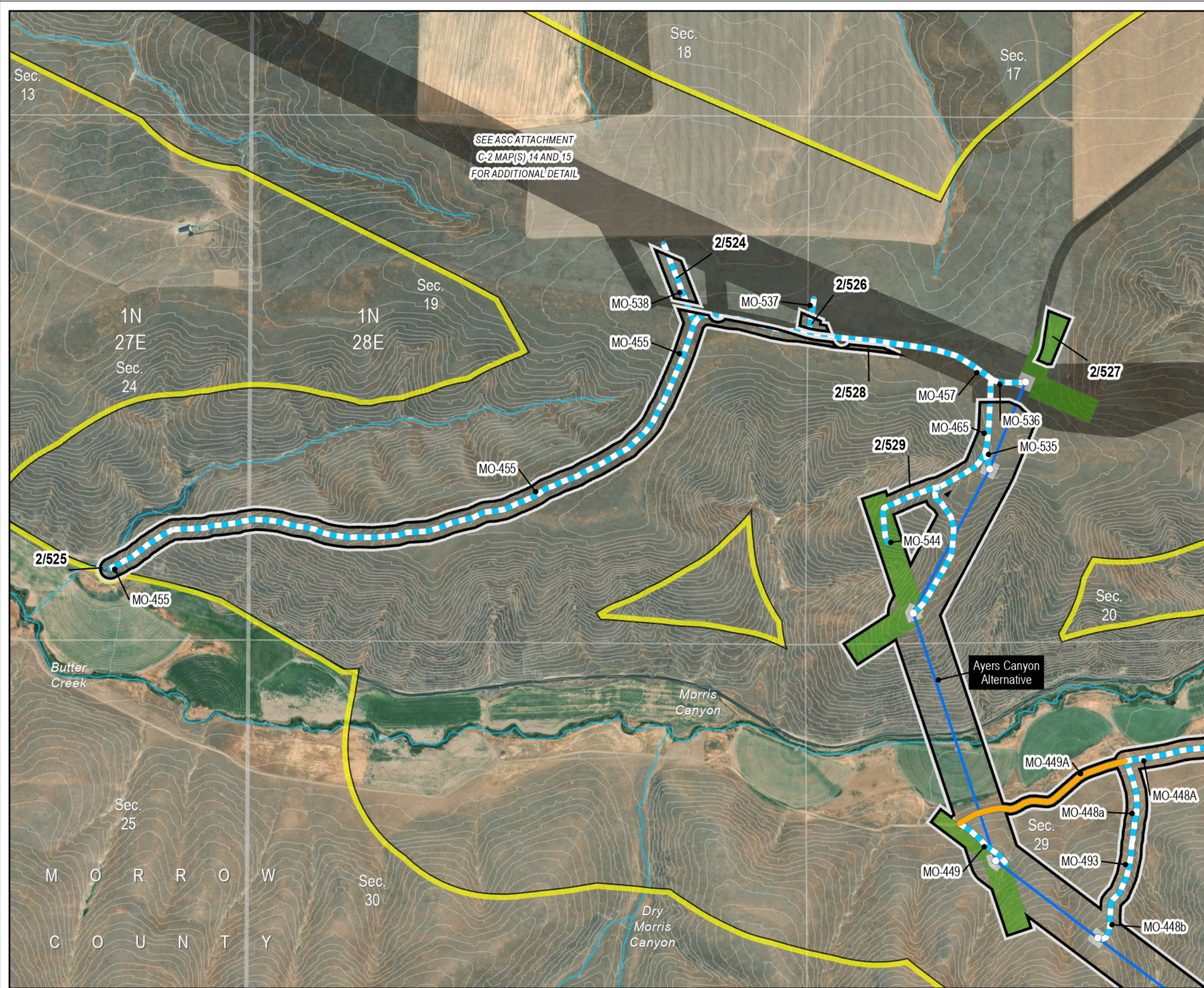
**Imagery:**  
World Imagery: Maxar



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

**Map 7**



SEE ASC ATTACHMENT  
C-2 MAP(S) 14 AND 15  
FOR ADDITIONAL DETAIL

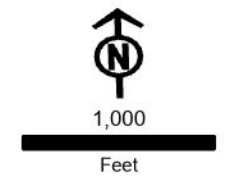
- Project Features**
- Proposed Site Boundary
  - Proposed Micrositing Area Addition
  - Previously Approved Micrositing Area
  - Towers\_RFA2
- Access (Unique ID)**
- Existing Road, Substantial Modification, 21-70% Improvements
  - New Road, Bladed
  - Transmission Centerline
- Work Areas**
- Pulling and Tensioning
  - Structure Work Area
- Important Siting Constraints and Other Features**
- 20-ft Contours
  - Stream
  - Land Status**
  - Private

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

Project features current as of December 5, 2023.

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

**Imagery:**  
World Imagery: Maxar



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

**Map 8**



SEE ATTACHMENT C-2  
MAP(S) 14, 15, AND 16  
FOR ADDITIONAL DETAIL

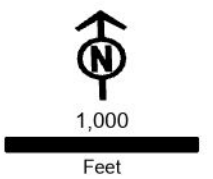
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| <b>Project Features</b>                                      | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary                                       | 20-ft Contours   |
| Proposed Micrositing Area Addition     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

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

Project features current as of December 5, 2023.

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

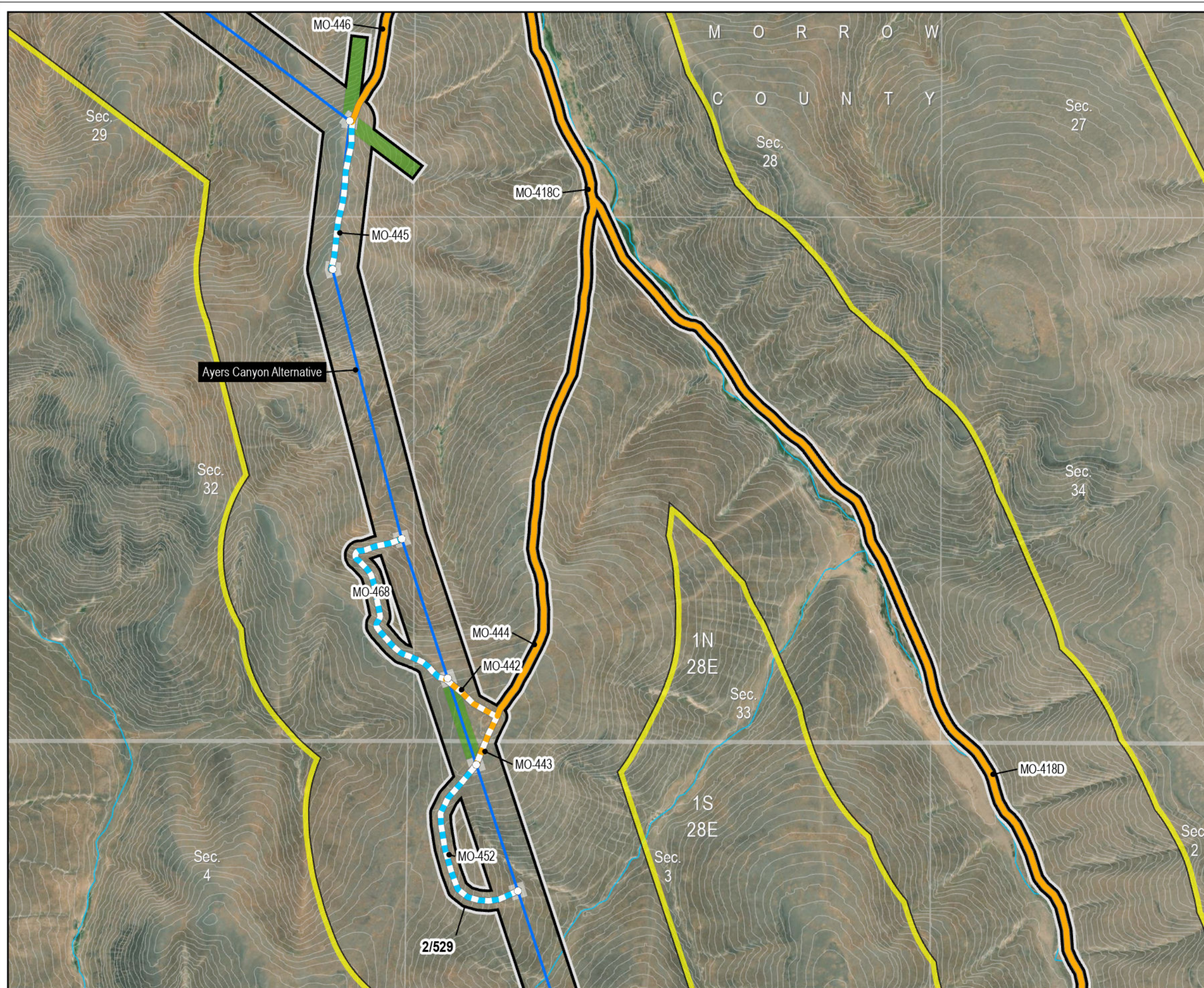
**Imagery:**  
World Imagery: Maxar



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

Map 9



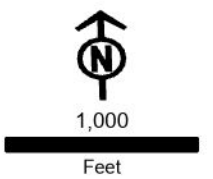
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| <b>Project Features</b>                                      | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary                                       | 20-ft Contours   |
| Proposed Micrositing Area Addition     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

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

Project features current as of December 5, 2023.

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

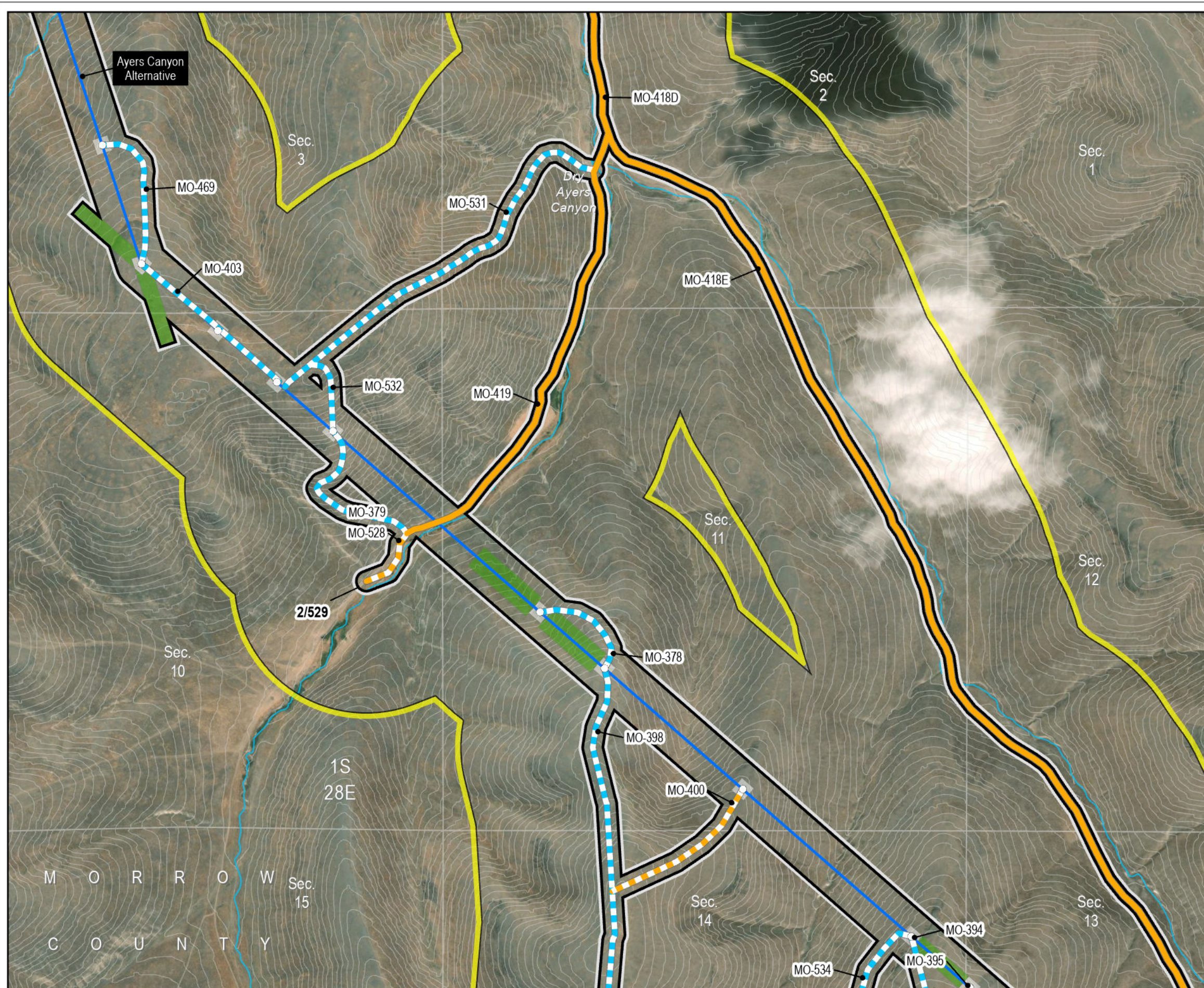
**Imagery:**  
World Imagery: Maxar



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

Map 10



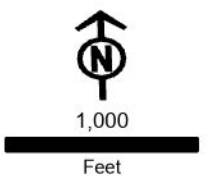
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|--|--|
| <b>Project Features</b>                                      | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary                                       | 20-ft Contours   |
| Proposed Micrositing Area Addition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

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

Project features current as of December 5, 2023.

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

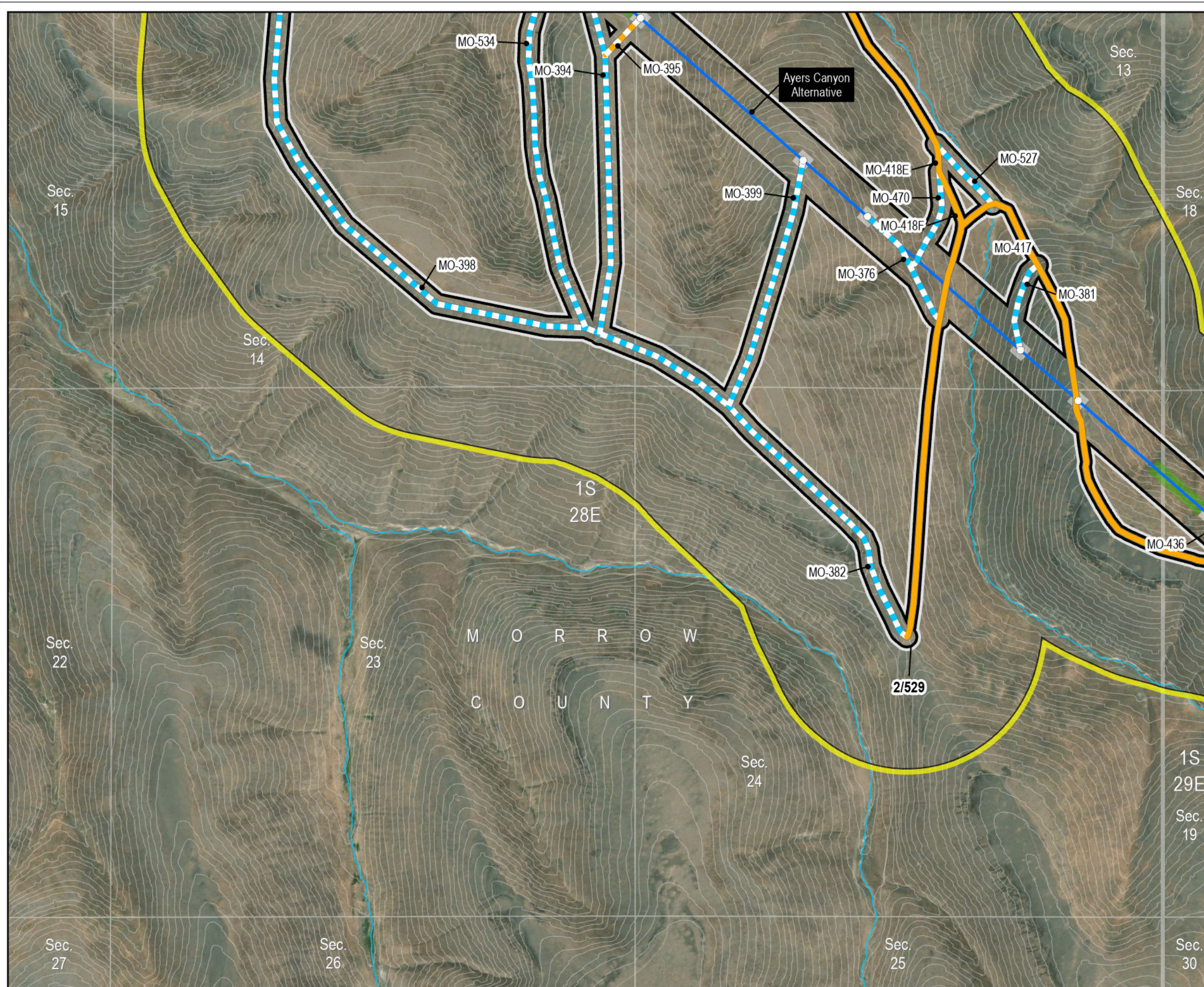
**Imagery:**  
World Imagery: Maxar



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

Map 11



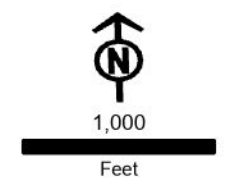
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| <b>Project Features</b>                                      | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary                                       | 20-ft Contours   |
| Proposed Micrositing Area Addition     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

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

**Project features current as of December 5, 2023.**

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

**Imagery:**  
World Imagery: Maxar

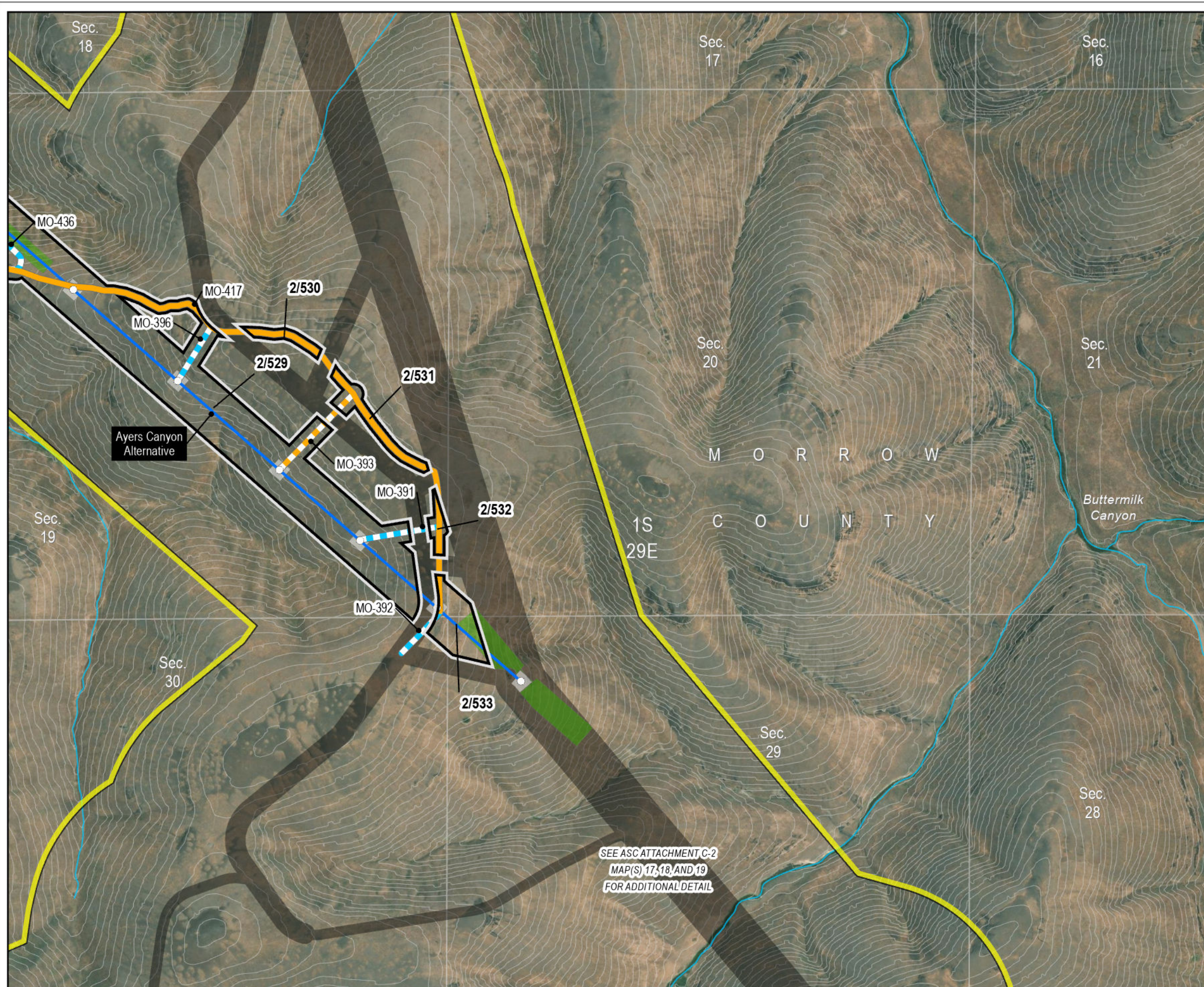




Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

Map 12



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

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

Project features current as of December 5, 2023.

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

**Imagery:**  
World Imagery: Maxar



1,000  
Feet



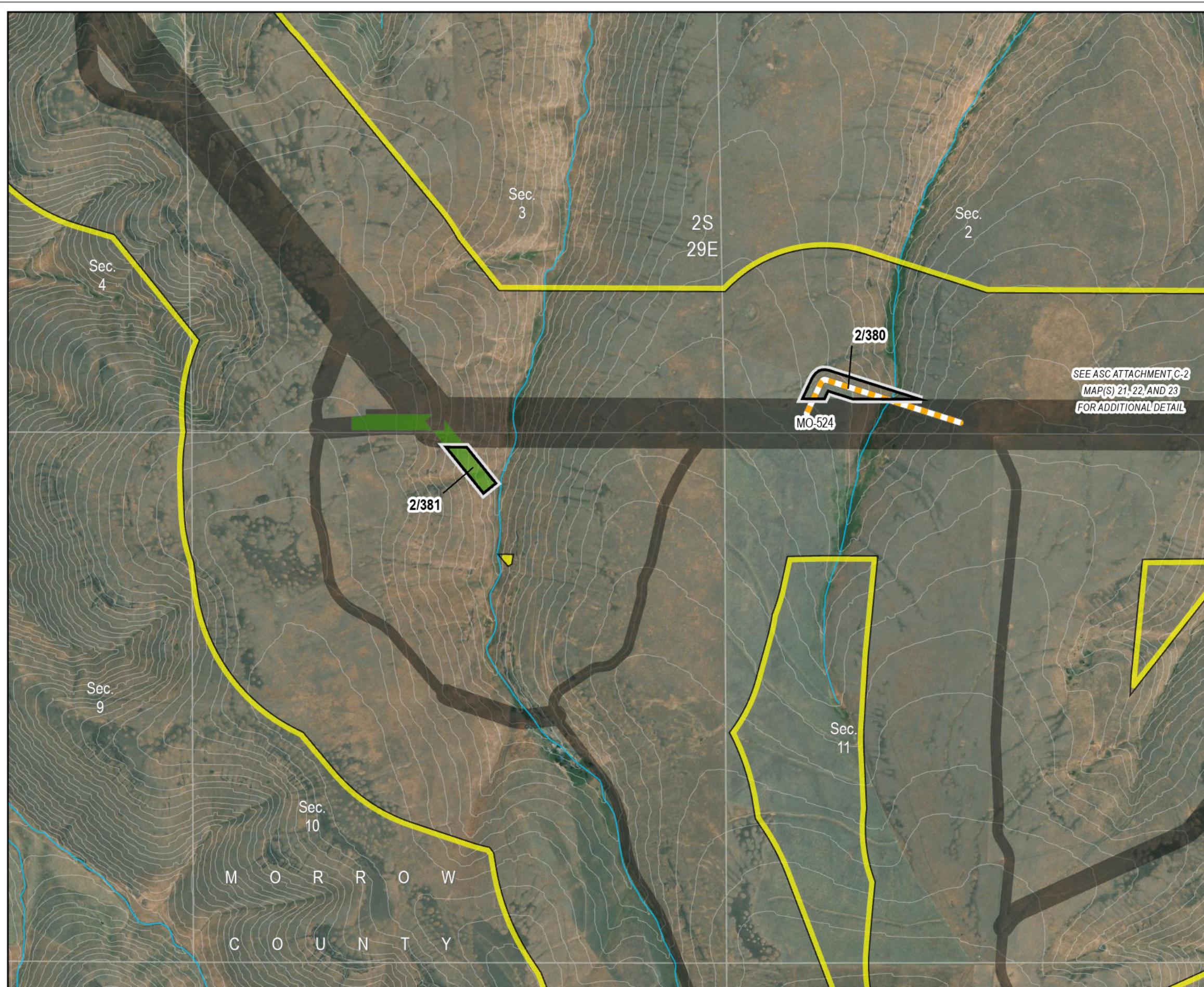
SEE ASC ATTACHMENT C-2  
MAP(S) 17, 18, AND 19  
FOR ADDITIONAL DETAIL



Boardman to Hemingway  
Transmission Project  
Request for Amendment 2

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

Map 13



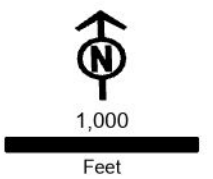
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| <b>Project Features</b>              | <b>Important Siting Constraints and Other Features</b> |
| Proposed Site Boundary               | 20-ft Contours   |
| Proposed Micrositing Area Addition   | Stream   |
| Previously Approved Micrositing Area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

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

**Project features current as of December 5, 2023.**

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

**Imagery:**  
World Imagery: Maxar



## TARDAEWETHER Kellen \* ODOE

---

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

**Organization:**

**Submitted by:** John Milbert

**Email:** jmfisherman9@gmail.com

**Zip Code:** 97850

**Siting Project Phase:** DPO

**Comment Summary:**

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

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