ESTERSON Sarah * ODOE

From: Sarah.ESTERSON@energy.oregon.gov
Subject: B2H - North Cap Reactor Station ADR

Attachments: B2H_North Cap Reactor Station ADR_20241011 FINAL.pdf

From: Gillen, Nik <ngillen@eocene.com> Sent: Friday, October 11, 2024 1:25 PM

To: ESTERSON Sarah * ODOE <Sarah.ESTERSON@energy.oregon.gov>

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Subject: B2H - North Cap Reactor Station ADR

Good afternoon Sarah,

Please see attached the North Cap Reactor Station ADR. Please let us know if you need anything else on this for the time being.

Thank you and have a great weekend,

Nikolaus Gillen

Regional Manager, Region 10

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AMENDMENT DETERMINATION REQUEST

Boardman to Hemingway (B2H) Transmission Line Project

Prepared for:

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October 2024

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INTRODUCTION AND REQUEST

Idaho Power Company (IPC) submits this Amendment Determination Request to relocate a series capacitor bank, shunt reactors, and related equipment from adjacent to the Bonneville Power Administration's Longhorn Substation to a new location approximately 15 miles south along the Boardman to Hemingway (B2H) Transmission Line adjacent to a PacificCorp station called Maverick Station that is in development in Morrow County, Oregon. The B2H series capacitor bank, shunt reactors, and related equipment will be referred to as the North Cap Reactor Station. The North Cap Reactor Station construction will begin in Q2 2026 and be completed by October 2027. The North Cap Reactor Station will be located entirely within the existing micrositing corridor approved in the original site certificate. Accordingly, no additional impacts or site certificate condition changes are anticipated.

Idaho Power has concluded that this proposed change to the project design does not require an amendment to the Site Certificate, and respectfully requests concurrence from ODOE that no amendment is required.

Description of Proposed Change

The North Cap Reactor Station is an approved facility, like the Midline Capacitor Station, that was discussed in the recently approved Request for Amendment 2. This proposed change would move the series capacitor bank consisting of 3 series capacitors, shunt reactors, and related equipment from the Longhorn Substation to the North Cap Reactor Station and will be located entirely within the existing micrositing corridor approved in the original site certificate. The North Cap Reactor Station will be completely fenced in once completed.

Amendment Determination Evaluation

Pursuant to OAR 345-027-0350, the purpose of this Amendment Determination Request (ADR) is to obtain the Oregon Department of Energy's (ODOE) concurrence that the proposed change to the Project does not require a Site Certificate amendment.

This section demonstrates that the modification proposed in this ADR is not subject to a Site Certificate amendment based on the following OAR 345-027-0350 factors.

Except for changes allowed under OAR 345-027-0353 (Changes Exempt from Requiring an Amendment), an amendment to a site certificate is required to:

(1) Transfer ownership of the facility or the certificate holder as described in OAR 345-027-0400 (Request for Amendment to Transfer Ownership, Possession or Control of the Facility or the Certificate Holder);

Ownership of the facility will not change because of this proposed change. Idaho Power Company will continue to be the Site Certificate Holder.

(2) Apply later-adopted laws as described in OAR 345-027-0390 (Request by Any Person for Amendment to Apply Later-Adopted Laws);

Idaho Power is not proposing that later-adopted laws be applied, and this rule is not applicable to the proposed change.

(3) Extend the construction beginning or completion deadline as described in OAR 345-027-0385 (Request for Amendment to Extend Construction Deadlines);

The construction of the North Cap Reactor Station will be completed by October 2027. No extension of the construction beginning, or completion will be needed.

- (4) 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 an applicable law or 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.

The proposed North Cap Reactor Station is a new related and supporting facility for the Project that will be sited within the Previously Approved Site Boundary/Micrositing Area. The North Cap Reactor Station is not adding additional equipment to the Project, this request is moving equipment originally proposed for the Longhorn Substation to the North Cap Reactor Station.

Standards Determination Evaluation

Given that this proposed change is located within the micrositing boundary, our analysis has identified the following 4 standards as requiring an in-depth analysis.

OAR 345-022-0030 - Land Use

The North Cap Reactor Station does not fall within the General Industrial Zone or Port Industrial Zone and is zoned as Exclusive Farming Unit (EFU). The current use of this parcel is for agriculture however the intention is that this parcel would be purchased for the uses of the proposed project change. The proposed change is consistent with stipulations in GEN-LU-01, and any amendments to the Morrow County permits, including zoning permit, will be obtained to include information related to the North Cap Reactor Station as needed.

• OAR 345-022-0080 - Scenic Resources

The proposed change is not anticipated to impact scenic resources. Construction of the North Cap Reactor Station will be significantly more visible than the permitted Project construction. There are no scenic resources within 20 miles of the North Cap Reactor Station. The North Cap Reactor Station is ~21.5 miles away from the Willow Creek Wildlife Area which is the nearest potential scenic resource.

OAR 345-022-0090 – Recreation

The North Cap Reactor Station is within the existing analysis area for the Project. The proposed change will not impact identified public recreation areas. There are no recreational areas within 15 miles of the North Cap Reactor Station. The North Cap Reactor Station is ~19.6 miles from Riverfront Park located in Hermiston, OR which is the nearest potential recreation area.

• OAR 340-035-0035 - Noise Control Regulations

The equipment associated with the North Cap Reactor Station which includes a series capacitor bank consisting of 3 series capacitors, shunt reactors, and associated equipment (non-mechanical) will not result in an increase in corona noise and is comparable to corona noise caused by the transmission line. Noise control operations and regulations agreed upon under RFA2 will preside over this proposed change. There are no identified NSR landowners within 1 mile of the North Cap Reactor Station that is within the ASC, RFA1, or RFA2 Site Boundary.

As described in the analysis provided above and in Table 1, the proposed change will not result in: (a) any significant adverse impacts the council has not addressed; (b) impairment to the certificate holder's ability to comply with a site certificate condition or (c) new or revised conditions are anticipated because of the proposed change.

TABLE 1. STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION		
Standard	Evaluation	Related Site Certificate Conditions
OAR 345-022-0000 General Standard of Review	The proposed change does not affect any findings of impact and complies with the related Site Certificate conditions. This proposed change will not add or change any dimensions to the micrositing corridor. The proposed change does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-GS-01: Commencement and completion of construction GEN-GS-02: Pre-construction requirements GEN-GS-03: Compliance during all phases GEN-GS-04: Notification of environmental impacts GEN-GS-05: Notification of new owners GEN-GS-06: Approved transmission line corridors CON-GS-01: Semiannual construction progress report CON-GS-02: Construction rights OPR-GS-01: Annual reporting OPR-GS-02: Site legal description OPR-GS-03: Vegetation restoration
OAR 345-022-0020 Structural Standard	The proposed change does not change the Council's earlier findings, and the Facility is being constructed to avoid dangers to human safety. The proposed change does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-SS-01: Compliance with building codes GEN-SS-02: Construct to prioritize human safety GEN-SS-03: Notification of foundation differences GEN-SS-04: Notification of geological observations PRE-SS-01: Pre-construction geological reports
OAR 345-022-0030 Land Use	The North Cap Reactor Station does not fall within the General Industrial Zone or Port Industrial Zone and is zoned as Exclusive Farming Unit (EFU). The current use of this parcel is for agriculture however the intention is that this parcel would be purchased for the uses of the proposed project change. The proposed change is consistent with stipulations in GEN-LU-01, and any amendments to the Morrow County permits, including a zoning permit, will be obtained to include information related to the North Cap Reactor Station as needed. The proposed change does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-LU-01: Morrow County permitting GEN-LU-02: Morrow County setback distances GEN-LU-11: Agricultural Mitigation Plan Not Applicable 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-07: Baker County permitting GEN-LU-08: Malheur County permitting GEN-LU-09: Malheur County setback distances GEN-LU-10: City of North Powder setback distances GEN-LU-11: Transmission line ROW in Goal 4 forest lands GEN-LU-13: ROW Clearing Assessment PRE-LU-01: Umatilla County road construction PRE-LU-02: Baker County aggregate suppliers

TABLE 1. STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION		
Standard	Evaluation	Related Site Certificate Conditions
		CON-LU-01: Baker County setback distances CON-LU-02: Morgan Lake notification
OAR 345-022-0040 Protected Area	The proposed change will not impact protected areas. is not within the existing analysis areas. The North Cap Reactor Station is ~21.5 miles away from the Willow Creek Wildlife Area which is the nearest protected area.	Not Applicable: GEN-PA-01: Wildlife agency coordination GEN-PA-02: Ladd Marsh Wildlife Area avoidance
OAR 345-022-0080 Scenic Resources	The proposed change will not impact scenic resources. Construction of the North Cap Reactor Station will be significantly more visible than the permitted Project construction. There are no scenic resources within 20 miles of the North Cap Reactor Station. The North Cap Reactor Station is ~21.5 miles away from the Willow Creek Wildlife Area which is the nearest potential scenic resource.	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
OAR 345-022-0090 Historic, Cultural, and Archaeological Resources	The Certificate Holder conducted cultural resource investigations in 2020, 2021, and 2022. These surveys included the entire North Cap Reactor Station. These surveys efforts are included within the Project Initial Class III Report, no adverse effects are anticipated as result of the North Cap Reactor Station. Therefore, the proposed does not alter the basis for the Council's earlier findings that the Historic, Cultural, and Archaeological Resources Standard. The proposed change does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-HC-02: Historic Properties Management Plan OPS-HC-01: Cultural Resources Technical Report Not Applicable: GEN-HC-01: Trail resource avoidance
OAR 345-022-0090 Recreation	The North Cap Reactor Station is within the existing analysis area for the Project. The proposed change will not impact identified public recreation areas. There are no recreational areas within 15 miles of the North Cap Reactor Station. The North Cap Reactor	Not Applicable: GEN-RC-01: Morgan Lake construction criteria

TABLE 1. STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION		
Standard	Evaluation	Related Site Certificate Conditions
	Station is ~19.6 miles from Riverfront Park located in Hermiston, OR which is the nearest potential recreation area.	
OAR 345-024-0090 Siting Standards for Transmission Lines	The proposed change provides a reduction of human exposure to electromagnetic fields by providing a more efficient supply of power. Therefore, the proposed change does not alter the basis for the Council's prior findings for Siting Standard for Transmission Lines and does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-TL-01: Reducing human exposure to electromagnetic fields GEN-TL-02: National Electric Safety Code compliance PRE-TL-01: Pre-construction Public Utility Commission briefing OPR-TL-01: Shock risk reduction OPR-TL-02: Annual Public Utility Commission safety updates
OAR 345-022-0060 Fish and Wildlife Habitat	The area of proposed change lies completely in the area surveyed in 2022 and 2023 for the following: Washington ground squirrel, pygmy rabbit, forest birds, big game animals, raptors, noxious weeds, rare plants in the surrounding habitat via TVES. The area was additionally surveyed for Washington Ground Squirrels in 2024. The construction site boundary lies in previously permitted areas with no additional anticipated impacts to fish and/or wildlife habitat. This project area is not in the habitat of big game or sage grouse. The site boundary of the North Cap Reactor Station lies in the approved Project area with no additional habitat impacted.	GEN-FW-02: Vegetation Management Plan compliance GEN-FW-03: Noxious Weed Plan finalization GEN-FW-04: Fish and Wildlife Habitat Mitigation Plan finalization GEN-FW-05: Construction personnel training GEN-FW-06: Environmentally sensitive area flagging and mapping GEN-FW-07: Private facility access road speed limit GEN-FW-08: Avian Protection Plan compliance PRE-FW-01: Biological surveys on unsurveyed land PRE-FW-02: Biological surveys CON-FW-02: Pygmy rabbit colony or bat roost observation CON-FW-03: Migratory bird nesting season surveys CON-FW-04: Raptor nest buffers OPR-FW-01: Compensatory mitigation calculations report Not Applicable: GEN-FW-01: Category 2 Grasslands Plan PRE-FW-03: Sage-Grouse Habitat Mitigation Plan finalization PRE-FW-04: Elk and sage-grouse habitat traffic study (pre- construction) CON-FW-01: Elk or mule deer winter range

TABLE 1. STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION		
Standard	Evaluation	Related Site Certificate Conditions
		CON-FW-05: Sage-Grouse Habitat Mitigation Plan compliance CON-FW-06: Sage-grouse areas construction restrictions 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 safe-grouse habitat traffic study (during operation)
OAR 635-412-0035 Fish Passage	The proposed change does not cross any streams or passageways that will require a Fish Passage Plan. The proposed change does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	Not Applicable: GEN-FP-01: Fish Passage Plans
OAR 340-035-0035 Noise Control Regulations	The equipment associated with the North Cap Reactor Station which includes a series capacitor bank consisting of 3 series capacitors, shunt reactors, and associated equipment (non-mechanical) will not result in an increase in corona noise and is comparable to corona noise caused by the transmission line. Noise control operations and regulations agreed upon under RFA2 will preside over this proposed change. There are no identified NSR landowners within 1 mile of the North Cap Reactor Station that is within the ASC, RFA1, or RFA2 Site Boundary. The proposed change does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-NC-01: Site-specific Noise Exceedance Mitigation Plans GEN-NC-02: NSR landowner list 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
OAR 345-022-0010 Organizational Expertise	There is no proposed change to organizational expertise. The proposed change does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	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

TABLE 1. STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION		
Standard	Evaluation	Related Site Certificate Conditions
		PRE-OE-02: Construction contractor compliance PRE-OE-03: Proof of third-party permits OPR-OE-01: Proof of inspection
OAR 345-022-0110 Public Services	The proposed change is within the existing analysis area for Public Services. There will be no alteration in limiting public services due to the proposed change. The proposed change does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-PS-01: Helicopter Use Plan GEN-PS-02: Fire Prevention and Suppression Plan submission PRE-PS-02: Traffic impacts and transportation coordination PRE-PS-03: FAA and ODA hazard determinations PRE-PS-04: Environmental and Safety Training Plan submission
		Not Applicable: PRE-PS-01: Owyhee Irrigation District consultation and mitigation
OAR 345-022-0050 Retirement and Financial Assurance	There is no proposed change to the Retirement and Financial Assurance Standard. The proposed changes will not affect the Council's earlier findings that the Retirement and Financial Standard is satisfied. The proposed change does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-RT-01: Prevention of non-restorable site PRE-RT-01: Pre-construction letter of credit naming State as payee OPR-RT-01: In-service letter of credit naming State as payee RET-RT-01: Retirement plan compliance RET-RT-02: Retirement of Facility upon cessation of activities.
OAR 345-022-0022 Soil Protection	Construction of North Cap Reactor Station will be conducted in compliance of the prepared ESCP, HWMSRP, and SPCC Plan. Blasting will not be needed to construct the North Cap Reactor Station.	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 GEN-SP-04: Blasting Plan finalization OPR-SP-01: Soil erosion impacts inspections
OAR 345-022-0070 Threatened and Endangered Species	The North Cap Reactor Station was included in the pre-construction surveys for Washington ground squirrel and threatened or endangered plant species. No threatened or endangered plant species or WAGS identified in the area affected by this proposed change. Therefore, the proposed changes will not affect the	CON-TE-01: Washington ground squirrel habitat restrictions CON-TE-02: Threatened or endangered plant species buffer

TABLE 1. STANDARDS, LAWS, AND SITE CERTIFICATE EVALUATION		
Standard	Evaluation	Related Site Certificate Conditions
	Council's earlier findings that the Threatened and Endangered Species Standard is satisfied.	
OAR 345-022-0120 Waste Minimization	The Certificate Holder's Construction Waste Management plan applies to both the Certificate Holder and contractor(s) associated with this proposed change. There is no significant impact to waste generation with this proposed change. The proposed change does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-WM-01: Construction Waste Management Plan submission
Removal Fill Law	There are no wetland features within the North Cap Reactor Station and the proposed change will not affect the Council's earlier findings that the Removal Fill Law Standard is satisfied. The proposed change does not alter the Certificate Holder's ability to comply with the Site Certificate conditions.	GEN-RF-01: Site Rehabilitation Plan submission GEN-RF-02: CWNWMP submission GEN-RF-04: Removal-fill permit compliance PRE-RF-01: Wetland delineation reports submission PRE-RF-02: Joint Permit Application update

CONCLUSION

The Certificate Holder provides this ADR to demonstrate that the proposed change does not fall under a factor requiring an amendment under OAR 345-027-0350. The proposed change 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.















