

**Bonneville Power Administration's
Record of Decision
For the Electrical Interconnection
Of the Vantage to Pomona Heights Transmission Line Project
September 2017**

DECISION

The Bonneville Power Administration (BPA) has decided to implement its part of the Vantage to Pomona Heights 230-kilovolt (kV) Transmission Line Project (Project) that was analyzed in the *Vantage to Pomona Heights 230-kV Transmission Line Project Final Environmental Impact Statement (EIS)* (DOI-BLM-OR-134-2013-0002-EIS and DOE/EIS-0505, October 2016). Pacific Power will construct, operate, and maintain the Project, which will be a new 230-kV transmission line that will extend from PacifiCorp's existing Pomona Heights Substation in Yakima County, Washington to BPA's existing Vantage Substation in Grant County, Washington. The U.S. Bureau of Land Management (BLM) was the Lead Federal Agency under the National Environmental Policy Act (NEPA) for preparation of the EIS for the Project. Twelve other public entities, including BPA, were involved in the EIS as cooperating agencies under NEPA. As a cooperating agency, BPA hereby adopts the Final EIS for the Project.

BPA's action related to the Project is to allow the interconnection of Pacific Power's transmission line to BPA's Vantage Substation. To allow this interconnection, BPA will execute a Line and Load Interconnection agreement with PacifiCorp¹ to provide interconnection facilities and services for the transmission line. Interconnection will involve connecting Pacific Power's transmission line to an existing substation bay at BPA's Vantage Substation, connecting the transmission line's fiber to the Vantage Substation control house, and installing and operating related electrical, metering, and relay equipment. The interconnection facilities will be located mostly on BPA-owned property within the Vantage Substation fence line.

Pacific Power has recently received approvals from the BLM and the U.S. Bureau of Reclamation (Reclamation) to construct, operate and maintain one of the alternatives – the New Northern Route (NNR) Alternative with an Overhead Design Option – that was considered and analyzed in the Final EIS for the Project. BPA's decision to implement its part of the Project is consistent with those approvals.

BACKGROUND

BPA and Line and Load Interconnection Requests

BPA is a federal agency that owns and operates the majority of the high-voltage electric transmission system in the Pacific Northwest. This system is known as the Federal Columbia River Transmission System (FCRTS). BPA has adopted an Open Access Transmission Tariff

¹ Pacific Power is a division of PacifiCorp. Pacific Power has proposed the construction of the Vantage to Pomona Heights Transmission Line Project, while PacifiCorp has requested interconnection of the Project to BPA's Vantage Substation.

(tariff) for transmission and interconnection services on the FCRTS, generally consistent with the Federal Energy Regulatory Commission's (FERC) *pro forma* open access tariff.² The interconnection of Lines and Loads to the FCRTS is governed by BPA's tariff.

BPA's tariff establishes processes for accepting requests to interconnect to the FCRTS, conducting interconnection studies and environmental reviews for these requests, and offering interconnection agreements on a first-come, first served basis in response to the requests. As part of its tariff implementation, BPA maintains an Interconnection Request Queue to manage requests to interconnect to the FCRTS.

While BPA accepts requests from line and load developers for interconnection of their new lines and loads to the FCRTS, BPA does not have siting authority or regulatory jurisdiction over these facilities. That is the purview of appropriate state and local entities, as well as other federal agencies that may have siting or other responsibilities (if, for example, a new proposed line crosses federal lands). BPA acknowledges and respects the authority and jurisdiction of these entities in line and load facility siting matters.

Pacific Power's Applications

In October 2008, Pacific Power filed separate right-of-way applications, Standard Form 299 Application for Transportation and Utility Systems and Facilities on Federal Lands (SF-299), with the BLM and the U.S. Department of the Army Joint Base Lewis-McChord Yakima Training Center (JBLM YTC) for its proposed Vantage to Pomona Heights 230-kV Transmission Line. Pacific Power filed these applications because portions of the Project would cross BLM-managed lands as well as the JBLM YTC. In addition to these SF-299 applications, PacifiCorp submitted a Line and Load Interconnection request (Request L0293) to BPA in April 2008 to interconnect Pacific Power's proposed new line to the FCRTS at BPA's Vantage Substation.

In April 2011, Pacific Power also filed a SF-299 application with Reclamation to request a grant of right-of-way across Reclamation lands. Pacific Power then filed updated SF-299 applications with JBLM YTC in November 2013 and with the BLM and Reclamation in June 2016.

EIS Process

To inform the decisions on these applications and in accordance with NEPA, the Council on Environmental Quality (CEQ) NEPA regulations, and other applicable laws and regulations, the BLM, as the Lead Federal Agency under NEPA and in coordination with cooperating agencies, conducted an EIS process under NEPA to analyze the environmental impacts of the Project and a reasonable range of alternatives. Twelve entities were cooperating agencies for the EIS, including BPA, JBLM YTC, Federal Highway Administration (FHWA), Reclamation, U.S. Fish and Wildlife Service (USFWS), Washington State Department of Archaeology and Historic Preservation (DAHP), Washington State Department of Fish and Wildlife (WDFW), Washington

² Although BPA is not subject to FERC's jurisdiction, BPA follows the open access tariff as a matter of national policy. This course of action ensures that BPA will receive reciprocal and non-discriminatory access to the transmission systems of utilities that are subject to FERC's jurisdiction.

Department of Natural Resources (DNR), Washington State Department of Transportation (WSDOT), Grant County, Kittitas County, and Yakima County.

The Notice of Intent (NOI) to prepare an EIS for the Project was published in the Federal Register on January 5, 2010 (75 FR 429). The publication of the NOI initiated the public scoping comment period that concluded on March 8, 2010. On January 4, 2013, the BLM published the Notice of Availability (NOA) for the Draft EIS in the Federal Register (78 FR 756), starting a 90-day public comment period.

As a result of the comments received at public meetings and submitted in writing during the Draft EIS comment period, the BLM, PacifiCorp, and JBLM YTC met and identified a new alternative route, the NNR Alternative. Because this new alternative had not been analyzed in the Draft EIS, the BLM decided to prepare a Supplemental Draft EIS that analyzed the new alternative. On January 2, 2015, the BLM published the NOA for the Supplemental Draft EIS in the Federal Register (80 FR 50). The information presented in the Draft EIS and Supplemental Draft EIS was combined in the Final EIS. On October 21, 2016, the BLM published the NOA for the Final EIS in the Federal Register (81 FR 72821).

On January 13, 2017, the BLM issued a Record of Decision (ROD) for the Project that authorized issuance of a right-of-way grant to Pacific Power for a 150-foot wide right-of-way on approximately 4 miles of land administered by the BLM along the 40.5 mile NNR Alternative with an Overhead Design Option for the construction, operation, and maintenance of Pacific Power's new 230-kV transmission line. On March 9, 2017, Reclamation also issued a ROD authorizing issuance of a right-of-way Grant to Pacific Power for a right-of-way across approximately 2 miles of Reclamation lands along the NNR Alternative with an Overhead Design Option. The JBLM YTC ROD for right-of-way authorization is in process.

ALTERNATIVES CONSIDERED

The Final EIS considered in detail a No Action Alternative; Alternatives A, B, C, D, E, F, G, and H; and the NNR Alternative with three options (an Overhead Design Option, an Underground Design Option, and the Manastash Ridge Subroute). The nine Action Alternatives considered in the Final EIS involve construction and operation of a new transmission line along various routes between the Pomona Heights and Vantage substations, along with equipment installation at these substations. The nine transmission line routes range in length from 40.5 miles to 66.9 miles and are clustered in two general vicinities (one group generally follow routes on the north side of the JBLM YTC, while the other group generally follow routes to the south of the JBLM YTC). The Final EIS identifies the NNR Alternative with an Overhead Design Option as the BLM's Agency Preferred Alternative. The Final EIS also discusses other alternatives that were considered but eliminated from detailed study in the EIS.

BPA's action (i.e. interconnecting the line at its existing Vantage Substation) will be the same under any of the nine Action Alternatives for the Project. The following summarizes the activities that BPA will undertake to implement its part of the Project, as well as the result of the No Action Alternative.

BPA's Activities under the Action Alternatives

After BPA executes the Line and Load Interconnection agreement with PacifiCorp, BPA will construct the necessary interconnection facilities to terminate Pacific Power's new transmission line at the Vantage Substation. For this interconnection, BPA will construct a new dead end structure inside the fence line of the Vantage Substation. The new structure will be about 155 feet tall and will consist of a single steel pole. BPA will extend the conductor from the last structure on Pacific Power's transmission line closest to the Vantage Substation, which will be located about 150 feet outside of the Vantage Substation fence, onto the new BPA structure. Once attached to the dead end structure, the conductor will be terminated into an existing line terminal bay, Bay 15, at the Vantage Substation.

In addition to the new dead end structure, BPA will install supporting communication equipment. BPA will install a new 4-foot by 4-foot fiber vault at the Pacific Power structure closest to the Vantage Substation. To connect the vault to the Vantage Substation, BPA will bury two, 4-inch-diameter conduits spaced about 15 feet apart for about 150 feet toward BPA's Vantage Substation. The fiber will then be pulled through the new conduit and through existing conduit in BPA's Vantage Substation and on to the BPA Vantage Substation control house. The communication fiber will terminate at an existing BPA communication rack within the control house. Grant County PUD will also pull fiber via existing conduit and ducting from the BPA Vantage control house to the adjacent Wanapum Substation control house.

In the Final EIS, the transmission line was proposed to enter the Vantage Substation from the east across Grant County PUD and Reclamation-managed lands. Upon further planning, Pacific Power requested that the new transmission line enter the Vantage Substation from the west after crossing the Columbia River. This adjusted alignment is about 1,000 feet west of the original alignment but is still located within the Project study corridor for the EIS.

As a result of the route adjustment, the transmission line will remain on Grant County PUD and Reclamation-managed lands, but the transmission line will be about 0.1 mile shorter overall. In addition, the associated environmental effects are expected to be consistent with those discussed in the Final EIS. With the slight decrease in overall transmission line length, the route adjustment will result in a slight decrease in ground disturbance. No effects to Endangered Species Act (ESA)-listed species will occur and the Project alignment will still be subject to the Project's Section 106 of the National Historic Preservation Act Section 106 Programmatic Agreement (PA). No wetlands or waterways were identified in the original or adjusted transmission line location. The adjusted alignment will result in a similar visual impact as the eastern approach alignment for nearby receptors.

Construction of the interconnection facilities is expected to begin in fall/winter of 2018/2019 and extend through 2020.

No Action Alternative

Under the No Action Alternative, BPA would not execute a Line and Load Interconnection agreement with PacifiCorp, and the interconnection of Pacific Power's new transmission line to BPA's Vantage Substation would not occur. If Pacific Power was not able to find an alternate interconnection point for its transmission line, it would be reasonably expected that Pacific Power would not build the transmission line. If that occurs, PacifiCorp would not be able to address the reliability issues identified. Therefore, if an outage of the existing PacifiCorp Pomona-Wanapum 230-kV Transmission Line were to occur, it could result in an overload of adjacent transmission systems and the failure of the regional transmission system in the Yakima area.

Because the environmental impacts associated with activities to interconnect the new line at the BPA substation would not occur under the No Action Alternative, the No Action Alternative is the environmentally preferable alternative.

BPA's RATIONALE FOR DECISION

In making its decision to implement its part of the Project, BPA has considered and balanced a variety of relevant factors. BPA considered how well each alternative under consideration would fit with BPA's statutory missions and relevant policies and procedures. BPA also considered the environmental impacts described in the Final EIS. BPA also considered public comments received throughout the NEPA process for the Project, including those received on the Draft, Supplemental Draft, and Final EISs. Another consideration was the extent to which each alternative under consideration would meet the following BPA purposes (i.e., objectives) identified in the Final EIS:

- Maintain the electrical stability and reliability of the FCRTS;
- Continue to meet BPA's statutory and contractual obligations;
- Act consistently with BPA's environmental and social responsibilities; and
- Provide for cost and administrative efficiencies.

Finally, BPA took into consideration the recent decisions by the BLM and Reclamation to grant respective approvals, in part based on the analysis contained in the Final EIS for the Project, for rights-of-way over the lands they manage for the NNR Alternative with an Overhead Design Option.

After considering and balancing all of these factors, BPA has decided to grant the requested interconnection to PacifiCorp. Approving this interconnection is consistent with the policies embodied in BPA's tariff, which is based on allowing open access to transmission and interconnection services on the FCRTS. BPA has adopted its tariff to be consistent with national policy promulgated by FERC that directs transmission providers to provide open access to their transmission systems. Because PacifiCorp has complied with the established tariff procedures for proposed line and load interconnections, BPA believes it is appropriate under its tariff to grant PacifiCorp's interconnection request.

Granting the requested interconnection will help to maintain the electrical stability and reliability of the FCRTS. In 2007, the Northwest Power Pool - Northwest Transmission Assessment Committee performed a detailed screening study of the regional transmission system's exposure to overloading. This transmission study determined that loss of the existing PacifiCorp Pomona-Wanapum 230-kV transmission line would result in the need to shed up to 167 megawatts (MW), which would occur through five different substations and would represent 33 percent of the 500 MW load in the Yakima area. This represents significant load shedding exposure on the transmission system that would also impact other regional transmission providers, including BPA. The transmission study showed that the addition of the Vantage to Pomona Heights 230-kV transmission line would eliminate the overloading potential and would ensure continued reliable and efficient electrical service to the Yakima Valley.

Granting the requested interconnection will not interfere with or otherwise affect BPA's ability to maintain the stability and reliability of its transmission system. The physical interconnection of the Project to the FCRTS will be designed and constructed to meet applicable reliability criteria and standards intended to maintain system stability, and the interconnection will include operating parameters and other provisions to ensure that operation of the transmission line will not impair system reliability. Furthermore, BPA's implementation of its part of the Project will not interfere with BPA's ability to meet its statutory and contractual obligations. Although BPA has no express statutory or contractual obligation to construct the facilities to support interconnection at the Vantage Substation, constructing the facilities is consistent with BPA's statutory directive to make additions to the transmission system, as appropriate, in order to integrate and transmit electric power and maintain system stability and reliability.

In planning and designing the Project, Pacific Power, in coordination with the BLM and the cooperating agencies, attempted to minimize potential environmental impacts where possible. Particular resource issues identified during Project planning were adverse effects on greater sage-grouse and its habitat; agricultural, residential, and military land uses; effects on scenic views; and archaeological and historic resources. As a result, BLM and Pacific Power have identified numerous mitigation measures and required design features in the Final EIS to reduce, avoid, or compensate for Project impacts. The required design features and mitigation addressed identified Project impacts, which were developed through an iterative process during the impact analysis with Pacific Power, the BLM, and the cooperating agencies. Pacific Power has committed to implement these protection measures as part of the development of the Project.

The total cost of the BPA interconnection facilities is estimated at \$1,676,600. All costs associated with these facilities will be advance funded by PacifiCorp and administration of contracts with PacifiCorp will follow normal, established procedures. In accordance with BPA's tariff, PacifiCorp will be eligible to receive transmission credits for any portion of the interconnection facilities that constitute network upgrades. BPA believes that this approach provides for both cost and administrative efficiencies.

MITIGATION

A complete list of required design features, which are environmental protection measures designed to avoid and/or minimize environmental impacts from Project construction, operation, and maintenance activities, is available in Appendix B of BLM's ROD. The required design features cover the following topics: construction, operation, and maintenance; biological resources, including botanical, wildlife, and special status species; land use and recreation; transportation; visual resources; cultural resources; wildland fire; climate and air quality; soils, geology, and water resources; and public health and safety. A Mitigation Framework also was developed to address the residual impacts to the greater sage-grouse that may result from the construction, maintenance, and operation of the transmission line. In addition, the right-of-way grants from the BLM and Reclamation to Pacific Power will require mitigation identified in the EIS to offset potential resource impacts beyond the required design features.

A Programmatic Agreement (PA) dated December 6, 2016 was signed by BLM, JBLM YTC, Reclamation, BPA, FHWA, DAHP, Pacific Power, and other invited signatories. The PA outlined a phased approach to Section 106 of the National Historic Preservation Act compliance. Under the PA, intensive Class III cultural resource surveys and evaluations of National Register eligibility will occur for the selected alternative. The identification and evaluation of historic properties and effect determinations, as well as mitigation plans for any adverse effects, will be conducted in accordance with this PA prior to any Notice to Proceed and Project implementation. Further, Pacific Power will develop several plans under the PA including a Cultural Resources Monitoring and Training Plan, Plan for the Unanticipated Discovery of Cultural Resources, and Inadvertent Discovery of Human Remains Plan.

A Project-specific environmental compliance management plan for construction and the monitoring of avoidance and minimization measures will be included in Pacific Power's Plan of Development (POD), which will be updated as new information and circumstances warrant. Specific plans identified in the Final EIS that will be included in Pacific Power's POD include Reclamation, Revegetation, and Monitoring Plan; Noxious Weed and Invasive Plant Management Plan; Wildlife and Plant Protection and Conservation Measures Plan; Traffic and Transportation Management Plan; Fire Prevention and Control Protection Plan; Dust Control Plan; and Spill Prevention, Control, and Countermeasures Plan.

All the required design features and mitigation measures for the transmission line described in the Draft EIS, Supplemental Draft EIS, and updated in the Final EIS have been adopted by Pacific Power. Pacific Power will be responsible for executing mitigation measures identified in the EIS.

PUBLIC AVAILABILITY

This ROD will be available to all interested parties and affected persons and agencies. Copies of the ROD, Draft EIS, Supplemental Draft EIS, and Final EIS can be accessed at BPA's Project website at www.bpa.gov/goto/V2PInterconnection.

Issued in Portland, Oregon October 3, 2017.

<u>/s/ Elliot E. Mainzer</u>	<u>10/3/17</u>
Elliot E. Mainzer	Date
Administrator and	
Chief Executive Officer	