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|  | Forest Park Neighborhood Association  C/O Neighbors West Northwest  434 NW 6th Ave. Suite 202  Portland, Oregon 97209  December 4, 2024 |

Morgan Steele | Land Use Services | Environmental Review & Greenway Review

503.865.6437 | Morgan.Steele@portlandoregon.gov

Christine Caruso | Land Use Services | Conditional Use Review

503.865.6420 | Christine.Caruso@portlandoregon.gov

**REQUEST FOR RESPONSE**

**Case File: LU 24-041109 CU EN GW**

**Pre App: PC # 22-142445**

Dear Morgan Steele and Christine Caruso,

Forest Park Neighborhood’s boundaries touch W. Burnside Road on the south and cross NW Cornelius Pass Road on the north. The neighborhood includes Forest Park and a long piece of City of Portland that extends around the park. Our neighborhood has taken an active role in land use matters that affect the ecological health of the park since our founding. We received your Request For Response dated November 4, 2024 regarding PGE’s proposed transmission corridor project in Forest Park and are pleased to provide this response.

Here is a summary of our main points:

1. The city should require PGE to provide a letter from Bonneville Power Administration (BPA) or Northern Grid[[1]](#footnote-1) confirming that this project must be built by 2028 to ensure stability of the grid and prevent widespread rolling blackouts as PGE has asserted. Independent corroboration of this assertion would be invaluable. BPA is obligated to provide transmission and a reliable grid. PGE’s Narrative reminds us of “BPA’s obligation to generate, market, and distribute electric power in the Pacific Northwest.”[[2]](#footnote-2)
2. PGE’s publicly available Transmission Plans describe Phases 4 and 5 of this project in more detail than PGE has provided to the city to date. The implications of these future projects for the park are dire. These projects (Phases 3, 4, and 5) should be considered as a whole, and PGE should be put on notice that they have plenty of time to identify, design, and acquire Alternative Routes for Phase 5.
3. PGE’s Alternatives Analysis has critical flaws. For example, PGE’s proposed project is never evaluated against the same standards as Alternative Routes in the Toth Report. No Alternative Routes in the Toth Report take advantage of shifting back and forth across St Helens Road to avoid impediments the way existing distribution powerlines do – the Alternative Routes are all limited to one side of the highway. We believe there are Alternative Routes available for Phase 3.
4. PGE’s Easement allows them to remove tall trees, but requires them to protect the first 14’ (height) of native vegetation in their Right-of-Way except along construction roads and at structure locations. We don’t see any other exception for construction and maintenance. PGE’s proposal appears likely to result in the loss of much vegetation in much of their Right of Way. This may violate their Easement.

If the city demonstrates to PGE that the proposed project is more expensive and perhaps more time consuming than expected, that will help PGE justify using one of the Alternative Routes outside of Forest Park.

This is an extremely complicated application with many technical elements. We try to focus here on comments that are most relevant to the approval criteria and staff’s evaluation of the application. We put our comments in italics in the next sections to help differentiate them from material that we quote.

1. **Why the city should require PGE to provide a letter from BPA or Northern Grid**

*To demonstrate an urgent need for this project, PGE asserts that very bad things will happen if their proposed project isn’t completed by 2028. PGE would prefer to use the existing easement in Forest Park because it makes their life easier, and the park pays the price for that ease. The stated 2028 deadline also helps them eliminate most Alternatives because they would take “too long” to implement.  
  
We think PGE should be required to provide a letter from an independent authority on transmission in our area (BPA or Northern Grid). This is like requiring a Service Provider letter, only in reverse – to demonstrate this project is truly needed and isn’t just about generating profits for PGE shareholders. Here’s what PGE says in the Revised Narrative (p. 43):*

Forest Park Natural Resources Management Plan (FP NRMP)

*Chapter 8. Implementation Procedures, Section B: Exceptions to the Plan*

*Approval Criteria for Exceptions to the Plan: The exception will be approved if:*

*(A). The proposal meets all the criteria for minor amendments.*

**Applicant’s response: The Proposed Project meets all the criteria for minor amendments. As per the FP NRMP, the approval criteria for minor amendments are as follows:**

*A. There is a demonstrated need for the proposal.*

**Applicant’s Response: As explained in greater detail in Section A4 of this application, the primary purpose of the Proposed Project is to maintain a reliable power supply to the Portland Metropolitan Region by implementing transmission configuration improvements that address identified transmission vulnerabilities. These improvements will enable PGE to meet federal and PGE electrical transmission reliability standards and assist with meeting system-wide plans for an improved and resilient electrical grid. Recently, demand forecasts for electricity have increased substantially due to several factors, including vehicle electrification, peak summer temperature increases, increasing adoption of residential air conditioning, and**

**industrial growth in the Portland Metropolitan Region.**

**Phase 3 of the Harborton Reliability Project (the Proposed Project) has independent utility from future phases of the project. It is meant to direct an additional source of 230 kV power to the Harborton Substation and resolve the three-terminal line condition by creating three new two-terminal lines connected to Harborton Substation. Phase 4 anticipates a time when PGE’s existing transmission wires running through Forest Park west of existing Tower 2996 need to be replaced with larger wire. PGE is performing early studies to determine different alternatives to address this need by reusing existing towers and staying within the established Utility ROW. If the need can be demonstrated and alternatives are evaluated to show work in Forest Park is necessary, PGE would initiate a separate land use process. Phase 5 looks even further ahead to when additional energy will need to be transmitted from the north to the Portland area. Although PGE anticipates this need, no specific routes or designs have been developed at this time. Similar to Phase 4, if any work is proposed in Forest Park, PGE would initiate a separate land use process at that time.**

**Without the urgently needed Proposed Project, the existing transmission capacity concerns will result in rolling blackouts during forecast peak demand days by or before 2028. The need for this Proposed Project has been demonstrated.**

*PGE repeatedly asserts in this application that Phase 3 of this project must be completed by 2028 to avoid rolling blackouts. Appendix C, the Alternatives Analysis (page 5), includes section* ***1.3 Context for Regional Power Transmission*** *(p. 5)**that explains at length that PGE’s grid has been subject to special rules since 1996 because of the South of Alston (SOA) path, that this project will resolve the limiting element in the SOA path. What is relevant here is that “BPA identifies SOA path limits.” BPA should know what’s needed to resolve any issues on the SOA path.*

***We believe BPA or Northern Grid should be able to confirm whether this project is needed, and if it is, if completion by 2028 is as urgent as PGE claims.*** *BPA just announced $3 Billion investment in grid and substation projects in addition to $2 Billion investments they announced last summer[[3]](#footnote-3). Will any of those projects alleviate the limiting factor for the SOA without this project?*

*Building transmission is a capital investment that is very profitable for PGE and their shareholders. We want to make sure they are cooperating and not competing with BPA to provide transmission capacity to increase profits. PGE’s November 8, 2024 Investor Presentation[[4]](#footnote-4) shows that they plan to invest $130 million this year in Transmission, increasing to $435 million in 2028.*

1. **PGE’s Transmission Plans Describe Phases 4 and 5**

*PGE’s application makes it clear that this project is Phase 3 of a 5 phase project, all related to the Harborton substation. The city’s June 5, 2024 Incomplete Letter for this application (LU 24-041109 CU EN GW) asked PGE to provide the location and scope for this project’s Phases 4 and 5.[[5]](#footnote-5)*

*PGE’s Revised Narrative respondeds:*

**Phase 3 of the Harborton Reliability Project (the Proposed Project) has independent utility from future phases of the project. It is meant to direct an additional source of 230 kV power to the Harborton Substation and resolve the three-terminal line condition by creating three new two-terminal lines connected to Harborton Substation. Phase 4 anticipates a time when PGE’s existing transmission wires running through Forest Park west of existing Tower 2996 need to be replaced with larger wire. PGE is performing early studies to determine different alternatives to address this need by reusing existing towers and staying within the established Utility ROW. If the need can be demonstrated and alternatives are evaluated to show work in Forest Park is necessary, PGE would initiate a separate land use process. Phase 5 looks even further ahead to when additional energy will need to be transmitted from the north to the Portland area. Although PGE anticipates this need, no specific routes or designs have been developed at this time. Similar to Phase 4, if any work is proposed in Forest Park, PGE would initiate a separate land use process at that time.**

*But PGE’s own publicly available Transmission Plans make the scope and timing of Phases 4 and 5 much clearer. Let’s start with the* ***PGE Long Term Local Transmission Plan For the 2023-2024 Planning Cycle, December 26th, 2023*** *– it explains itself, the demonstrated need for the projects in the plan, and even points us to the folder with these Transmission plans:[[6]](#footnote-6)*

This 2023 Longer Term Local Transmission Plan reflects Quarters 5 through 8 of the local transmission planning process as described in PGE’s Open Access Transmission Tariff (OATT) Attachment K. The plan includes all transmission system facility improvements identified through this planning process. A power flow reliability assessment of the plan was performed which demonstrated that the planned facility additions will meet NERC and WECC reliability standards.

PGE’s OATT is posted on its Open Access Same-time Information System (OASIS) at

<http://oasis.oati.com/PGE> . Additional information regarding Transmission Planning is located in the Transmission Planning folder on PGE’s OASIS.

*PGE’s 2023 Transmission Plan shows Phase 3, the* ***Harborton Reliability Project*** *has a project completion date of November 2026 (p. 19).*

**Harborton Reliability Project[[7]](#footnote-7)** (p. 24)

**Justification:** The Harborton reliability project reconfigures the system to increase 230kV transmission capacity into the Portland area and provide a stronger source to the Northwest Portland 115kV system. One key purpose of this project is that it addresses transmission operations flexibility for the loss of the Rivergate bulk power transformer. The Harborton 115kV and 230kV yards will be constructed in a breaker and a half configuration with five 230kV lines into Harborton and three 115kV lines. One bulk 230/115kV transformer at Harborton is also installed. The Canyon-E 115kV line will be reconductored during the project.

**Scope:** Currently underway for this project is a reconductor to the E-Wacker 115 kV line to 1272 ACSS. Next, the 115 kV system will be reconfigured to create a Harborton-Wacker 115 kV circuit, which will also be reconductored to 1272 ACSS. The 115 kV line idled for this reconfiguration will be utilized for the fifth 230 kV source into Harborton. The Horizon-St Marys-Trojan 230 kV circuit will be looped into Harborton, creating the Harborton-Horizon 230 kV, Harborton-St Marys 230 kV, and Harborton-Trojan #2 230 kV circuits.

*Please note:*

1. *The Justification does not mention reliability or the famous SOA problem, only a need for increased capacity and operations flexibility. The scope is what we expect.*

***Phase 5:*** *The 2023 Plan shows the* **Harborton-Trojan #3 and #4 230kV** *project**has a project completion date of April 2030 (p. 43). Based on what PGE has told us,* ***this is Phase 5****.*

**Harborton-Trojan #3 and #4 230kV** (p. 44)

**Justification:** This project was identified in order to access new, decarbonized resources in order for PGE to meet obligations under Oregon’s HB 2021 law. The lines will be part of the SOA path, which is fully subscribed. Because of power transfer distribution factor (PTDF), nearly all transfers of power from any part of the WECC footprint have at least some impact on SOA. Given that SOA is fully subscribed, no new transmission service is available to PGE’s service territory without adding new incremental capacity to the SOA path. It will construct two additional lines from Trojan to Harborton, utilizing existing right-of-way. This project will alleviate market congestion constraints on the SOA path for PGE and increase the total transfer capability between BPA and PGE.

**Scope:** PGE to construct two 230kV lines from Harborton to Trojan using existing right-of-way. The Harborton-Rivergate #1 230kV line will also be reconductored as part of this project.

**Project Status:** PGE is exploring implementing this project in the Longer Term Planning Horizon. This project will be submitted for a regional coordination study.

*Please note:*

1. *The Justification is explicit that this project will be build using “existing right-of-way” and the only place PGE has existing right-of-way for this project is inside Forest Park. This project would eliminate an additional 15 acres of mature closed canopy forest in the park, and because these lines need to connect into Harborton, that connection would eliminate the remaining strip of forest in PGE’s easement – the one they were so pleased to protect during Phase 3. Our attached PGE 230kV Transmission Configuration Schematics try to explain where all the lines go.*
2. *The Project Status says this project will be submitted for a regional coordination study in this 2023 plan.*
3. *The SOA problem has migrated to this Harborton-Trojan #3 and #4 project.*
4. *The 2024 Transmission Plan has all the same information about this project except it doesn’t include the Project Status section that mentions the regional coordination study. Did the study get done, and if so, what was the result?*

***Phase 4:*** *The 2024 Transmission Plan adds this “reconductor” project with a completion date of April 2029 (p. 19), less than 5 years from now and only a few years after Phase 3. Based on what PGE has told us,* ***this is Phase 4****: replacing old wire with new higher capacity wire from the upper edge of Phase 3 into Hillsboro and Beaverton. If approved, about a mile and a half of this work will happen in Forest Park. This project seems inevitable – PGE is installing the new high capacity wire throughout the Phase 3 project. Putting new wire on the rest of these lines is a cheap way to add transmission capacity, but the work will have a significant impact on Forest Park. The only question might be whether PGE will want to replace any towers.*

**Evergreen-Harborton and Harborton-St Marys 230kV Reconductor** (p. 20)

**Justification:** 5-year planning models indicate significant N-1-1 overloading on Evergreen Harborton. 10-year planning models indicate significant N-1-1 overloading on Harborton-St Marys as well. Given that both circuit run on common towers, it is recommended to reconductor both simultaneously to reduce cost and environmental impact in sensitive areas.

**Scope:** Reconductor both Evergreen -Harborton 230kV and Harborton-St Marys 230kV lines for all sections that are not currently 2156 ACSS.

*According to PGE’s application materials, reconductoring (upgrading wires) on existing towers is not a low-impact operation for the park:*

String new transmission wire between Harborton Substation and Tower 2996 to create new … transmission lines on the existing transmission towers… This will require the establishment of temporary work areas for construction access, temporary soil storage, line-pulling, and equipment turnaround space.[[8]](#footnote-8)

***Added together, Phases 3, 4, and 5 would clearcut over 20 acres in the Northern Unit of Forest Park, eliminating any remaining forest in PGE’s Right-of-Way, and would do more harm in another mile and a half of PGE’s east/west Transmission Corridor.***

*Doubling the width of the clearing in the north/south Transmission Corridor will deeply fragment the Northern Unit -- create a much wider clearing for small wildlife to cross, dry out much more of the closed canopy forest in this sensitive Unit to the dehydrating influence of the sun and encouraging invasive species, and divide Forest Park’s narrowest dimension down the middle.*

*This the opposite of the FP NRMP’s vision for this Unit in Forest Park: to creating intact old growth forest. “Above all, wildlife habitat in the North Unit should be protected.” (p. 105). The goals and plans in the FP NRMP related to the utility corridors are to minimize and revegetate them to the greatest extent possible to reduce fragmentation.[[9]](#footnote-9) Clearing all the forest in the north/south Transmission Corridor, churning the soil, and removing much of the understory vegetation would deeply damage the park forever.*

*We are concerned that PGE has broken this large project in Forest Park into three smaller pieces to try to hide the full impact on the park. But doing this project in stages and at different times will likely mean repeated harm to the vegetation, soils, and wildlife habitat in the park. Resources protected in one phase may be eliminated in the next.   
  
Many regulators have a minimum threshold for projects they review. PGE may also have avoided having this project reviewed by other authorities by breaking it into these small pieces.*

*PGE’s 2015 Transmission Plan[[10]](#footnote-10) also shows that they started planning the Harborton Reliability Project that year (p. 17) with a projected completion in 2021. The description of the project is essentially the same as it is today. The Transmission Plan says* “Project planning is complete; this project was submitted for inclusion in the 2016 capital budget and was recommended for approval.”

*So if the project planning was complete in 2015 and recommended for approval in the 2016 capital budget, why was the permit for Phase 3 not submitted until 2024?   
  
We wonder if PGE deliberately waited so they could blame a looming power grid crisis for not having time to investigate, design, and acquire alternate routes outside the park. If they had started work on those Alternatives in 2015, they would have had time to acquire easements and resolve impairments. Now they threaten us with rolling blackouts if they are forced to do that work.*

**3. PGE’s Alternatives Analysis has Critical Flaws**

*PGE’s proposed project is never evaluated against the same standards as Alternative Routes in the Toth Report. The Toth Report standard is if any small part of an Alternate Route’s Right-of-Way (ROW) crosses the Forest Park boundary that is a fatal flaw (Severe Impediment that can’t be mitigated). Compare this to the damage inflicted on Forest Park by PGE’s Proposed Project, which PGE has no problem justifying. The Toth report also doesn’t differentiate between tall trees (conifers and Big Leaf Maples) and lower growing trees like Oregon white oak that PGE says can live intact under their powerlines. Here’s how the Toth Report treats any Alternative Route’s ROW that overlaps even a tiny part of Forest Park (p.15):*

Forest Park Proximity

Alternative routes to the Preferred Route are being examined due to the Preferred Route’s impact on Forest Park. Routing a transmission line through any portion of Forest Park would require clearing of trees within the ROW which is undesirable to the City of Portland.

Forest Park Proximity was determined to be a Severe Impediment where the ROW overlaps with the park boundaries. Forest Park Proximity was determined to be a Moderate Impediment if the route is close enough that “danger trees” are located inside Forest Park. A danger tree is one that, although outside the ROW, is tall enough that if it fell it could impact the transmission wires (see Figure 4 below). PGE manages vegetation and trees in all its transmission ROW.[[11]](#footnote-11)

*“Constructability” is another Toth impediment score that hasn’t been applied equally to PGE’s Proposed Project and the Alternate Routes in the report. This is how the report evaluates it (p. 16):*

Constructability

A site visit to the Project Area was conducted by PGE personnel on September 20, 2022, evaluating aspects of the route alternatives that may not be apparent from a desktop review, such as extreme construction methods, terrain issues, and significant impact to existing landowners.

Constructability impacts from the site visit classified as Severe Impediments are:

1. Locating structures immediately southwest of Highway 30 ROW, which likely require extreme construction methods, such as drilling micropiles, in order to stabilize exposed rock face.
2. Extremely steep terrain that may create clearance violations requiring taller structures and create access challenges for routine maintenance or outage restoration.
3. Relatively dense residential development that has significant impact to existing landowners and may require either taller structures with longer span lengths or tighter structure spacing with more angles. These observations supplement the Building Proximity impediment.

*Nothing is said about the steep slopes, historic landslide, and difficult access of PGE’s proposed project site. There are existing distribution powerlines on the southwest side of Highway 30, some resemble 115kV poles used in PGE’s Tonquin project.*

*Toth Alternative Route 2:*

*This is how Toth describes the two fatal flaws (Severe Impediments) they assessed for Route 2, Forest Park Proximity and Constructability (p. 19-20):*

Forest Park Proximity – Severe

Alternative 2 ROW includes lands within Forest Park and would require a new easement. Trees within its ROW would need to be cleared. Trees outside of its ROW that are within Forest Park would constitute danger trees to a new line along this route alternative. The trees are located up a steep slope from the alignment, which renders the number of danger trees much higher than in a flat ROW.

*The area of overlap for this ROW with Forest Park is very small, particularly compared to the overlap of PGE’s Proposed Project. Compared to PGE’s Proposed Project, the number of affected trees would be tiny. The report also does not differentiate between conifers and tall Big Leaf Maples and Oregon white oaks that PGE has assured us can generally thrive under powerlines. If monopoles were positioned thoughtfully it is possible that no oaks would be affected by Route 2.*

*Toth’s application of Forest Park Proximity resulted in a Severe Impediment rating for Route 2, even though the overlap of that ROW with the Forest Park Boundary is very small and adjacent to St Helens Road. There may be valuable Oregon white oaks in that overlap area, but PGE has assured us that those oaks can grow under their powerlines.*

*The other Severe Impediment that resulted in the elimination of Route 2 in Toth’s assessment is “Constructability.”*

Constructability – Severe

Alternative 2 requires locating structures immediately southwest of Highway 30 ROW that may require extreme construction methods. Alternative 2 also traverses relatively dense residential development that has significant impact to existing landowners and may require either taller structures with longer span lengths or tighter structure spacing with more angles.

In summary, Alternative 2 is not a viable alternative due to its Severe impediments from Forest Park Proximity and Constructability.

*Alternative Route 2 does not cross directly over any homes. There is a wide ROW for Highway 30 near most homes near this route and it isn’t clear how many private properties the actual ROW would cross. There are existing distribution power lines on the southwest side of Hwy 30, so most of this Route was constructable for them. Any problems with Constructability were not weighed equally against the similar issues with PGE’s Proposed Project, which was assumed to be perfectly easy.*

*Toth also did not consider another Alternative that follows the example of the existing powerlines adjacent to Highway 30 – those lines shift back and forth across the Highway to avoid impediments. In some areas the railroad tracks are further from the highway and there is more room for powerlines on the northeast side of the road. In other areas there is a wide ROW available on the southwest side of the highway that can be used.*

*Toth Alternative Route 4:*

*The other apparently viable Alternative is Route 4. Here’s the Toth explanation of the only Severe Impediment for this option (p. 22):*

Alternative 4

Existing PGE Facilities – Severe

Alternative 4 would need to occupy the ROW used by the Harborton-St Helens 115 kV transmission line. In order to downgrade this impediment, an alternate corridor for the 115 kV line, as well as underbuilt 13kV distribution and telecommunication lines, must be found. As detailed in the rest of this study, severe impediments exist for other route alternatives that would apply to a 115 kV single-circuit corridor as well.

Examining the engineering and operational feasibility of co-locating three overhead transmission lines in one corridor is beyond the scope of this study.

*The report concludes (p. 22):*

In summary, Alternative 4 is a viable route alternative provided the noted impediments from Residential Buildings, Harborton Conservation Area, Pipeline Proximity, and Existing PGE Facilities can be downgraded. Alternative 4 requires purchasing the Residential Building or a minor deviation to avoid the Residential Building. The existing 115 kV transmission line would need to be relocated elsewhere.

Alternative 4 may need to occupy a reduce ROW width in the Harborton Conservation Area.

*But have we already forgotten Alternative 2? Even if Route 2 isn’t suitable for two 230kV lines at this time, it can probably accommodate a single 115kV line without any overlap of Forest Park and minimal overlap of private property that would require easements. If the line is allows to jump back and forth across Hwy 30, perhaps most impediments could be avoided. This obvious solution of using Toth’s Alternate Route 2 for the 115kV line hasn’t been considered in any of PGE’s materials that we’ve seen.*

*Another alternative would be to move that 115kV line from Alternative Route 4 to PGE’s ROW in Forest Park, which would not be used by Harborton-Trojan #1 and #2 if they are moved to Route 4. See our attached PGE 230kV Transmission Line Diagrams 120324.*

*We don’t like the Southern Termination Point for any Alternative Routes – it is too close to Miller Creek and risks even more wildlife habitat damage than PGE’s Proposed Project.*

***PGE’s proposed project must be compared to all the Alternatives on an even footing.***

We believe that given the 5+ years available to plan for Harborton-Trojan #3 and #4, PGE can identify, design, and acquire an Alternative Route outside Forest Park, perhaps using Alternative Route 2 if Route 4 is used in Phase 3.

The best outcome for Forest Park would be for all four of the eventual Harborton-Trojan lines to use routes outside Forest Park.

If a right-of-way for the existing 115kV line currently located in Route 4 is needed in that scenario, it could be located in the PGE right-of-way in Forest Park. 115kV lines have a narrower Transmission Corridor and a much smaller footprint than 230kV lines.

This is the scenario best aligned with the Forest Park Natural Resources Management Plan (FP NRMP) -- for all four Harborton-Trojan 230kV lines to be located outside of Forest Park, which would allow most or all the north-south part of the right-of-way to be restored to mature forest. This would be truly consistent with Conservation Goal 1 in the FP NRMP:

*Protect Forest Park’s native plant and animal communities, its soil and its water resources while managing the forest ecosystem in order to grow a self-sustaining ancient forest for the enjoyment and benefit of future generations.*

**4. PGE’s Easement Requires them to Protect 14’ of Vegetation in their ROW**

The Rights-of-Way Clearing section of the Easement[[12]](#footnote-12) says clearing has to be conducted “in the manner and style as indicated in Exhibit “A”.  The Rights-of-Way Maintenance section (p. 7) says:

1. Grantee hereby agrees to comply strictly with the clearing diagram, Exhibit “A,” to the end that the visual and ecological impact of the right-of-way on the park is minimized.

In Exhibit A, on p. 14, there is a “Clearing Diagram” with text that says PGE must “preserve” all the trees and vegetation that is 18’ below the sag of the lowest line (32’), except along construction roads and at structure locations. PGE is allowed to cut tall trees in the Right-of-Way and Danger Trees.



The lowest conductor in the diagram above the text is a minimum of 32’ above the ground, so 32’ – 18’ = 14’ tall vegetation is to be preserved in PGE’s Right-of-Way (ROW). This 14’ vegetation height is mentioned again in section XIII, Reservation by Grantor, on p. 12 (last sentence in that section). 

We don’t see an exception to the 14’ vegetation preservation requirement for construction or maintenance in the body of the easement, “except along construction roads and at structure locations.”  Miriam Webster’s online dictionary defines along to mean “in a line matching the length or direction of” – so any disturbance or removal should be limited to areas close to the construction roads and at structure locations.

The enormous equipment that PGE plans to use to remove downed trees, drill holes, install pole bases, etc. is likely to demolish vegetation they roll over.

**Previous Comment/Requests**

We also want to briefly mention our earlier email dated 11-22-24 asking PGE to provide this additional information:

1. Any additional studies, reports, or surveys they have related to the Alternatives Analysis and the Toth Report’s Marina Way options.
2. The letter(s) PGE’s Property Rights Group sent to property owners who might be affected by the Marina Way options, a list of property owners the letter was sent to, and the responses that PGE received.

**Conclusion**

Forest Park Neighborhood respectfully requests city staff to recommend against approving this application for the reasons stated above. The harm it would do to Forest Park is so great that it is difficult to comprehend. The sight of massive machines lumbering up and down the steep slopes of the park and piling up large mature trees and squishing small critters is devastating.

If this application is approved, we believe that PGE should be required to maintain the mitigation plantings of oak for 50 years – that’s how long we believe it will take for that plant community to establish and stabilize enough to discourage invasive species.

Our neighborhood appreciates city staff’s hard work to evaluate and respond to this complex and technical application.

We also appreciate PGE’s efforts to inform the community about this project and to find mitigation solutions. We just don’t think those solutions are even remotely adequate compensation for the damage the project would do. There are alternatives where these lines could be located outside the park, PGE needs to be able to justify turning to them.

Thank you for your consideration. Sincerely,

Carol Chesarek

Co-Chair, Forest Park Neighborhood Association Land Use Committee

Attachments:

* PGE 230kV Transmission Line Diagrams 120324

*Forest Park Neighborhood welcomes everyone: all races, religions, countries of origin, sexual orientations, genders and abilities. Our neighborhood is enriched by the diversity of our residents and community members. Each individual has dignity and the potential to contribute to our community as a whole.  We embrace and respect one another first as neighbors, and we strive to look out for each other.  We encourage everyone to engage with our neighborhood to create a welcoming and safe place to live, work and recreate.  Hate has no home here.*

1. [www.northerngrid.com](http://www.northerngrid.com) says “NorthernGrid is the outcome of a single transmission planning region, facilitating regional transmission planning, enabling one common set of data and assumptions, identifying regional transmission projects through a single stakeholder forum, and eliminating duplicative administrative processes.” Retrieved December 4, 2024.  
    [↑](#footnote-ref-1)
2. Narrative, p. vii [↑](#footnote-ref-2)
3. <https://www.bpa.gov/about/newsroom/news-articles/20241015-bpa-maintains-tx-expansion-momentum-with-13-new-proposed-projects> . Retrieved 12/4/24. [↑](#footnote-ref-3)
4. <https://investors.portlandgeneral.com/static-files/b28a1d03-9164-43d8-829d-e3437b6daab6> , p. 8. Retrieved 12/4/24. [↑](#footnote-ref-4)
5. Incomplete Letter for LU 24-041109 CU EN GW, page 15 item 2. [↑](#footnote-ref-5)
6. Unfortunately, the link to the page with the Transmission Plans provided in that paragraph doesn’t work. This one does: <http://www.oasis.oati.com/pge/> . Open the page, then scroll down the window on the left to find the Transmission Planning folder, then the Local Transmission Plans folder. You will see PGE Transmission Plans going back through 2011.   
    [↑](#footnote-ref-6)
7. Some of the PGE Transmission Plans call this the **Lower Columbia Resiliency Project** instead. [↑](#footnote-ref-7)
8. *Revised Application for: Portland General Electric Company (PGE) Harborton Reliability Project*, October 28, 2024. Narrative, Applicant’s Written Statement, page 7. [↑](#footnote-ref-8)
9. From the FP NRMP, pages 159-160:

   “RE-8C/N: **Utilitv** Corridor Management

   Goal: Improve wildlife habitat value.

   Objective(s): Reduce fragmentation of interior forest habitat.

   Replace non-native vegetation with native plants having higher wildlife habitat value.

   Reduce disturbance and erosion.

   Add cavity nesting opportunities.

   Avoid expansion or addition of utility easement areas.

   Recommendation (or Working Hypothesis): Interior forest habitat is one of the most valuable habitat types. It is rare in the Portland-Vancouver area. Avoid or reduce fragmentation of this habitat.

   Manage powerline corridors to maximize forest canopy, to maximize diversity of native plant species, *to* minimize

   invasive non-native plants, and to minimize disturbance and erosion. Allow large tree species to grow as close to powerlines as possible. Top conifers interfering with powerlines rather than removing them. Where conifers are not practicable, native small trees and shrubs should be grown. Remove non-native shrubs, notably Himalayan blackberry and Scot's broom, and replace with native conifers, small trees or shrubs.

   Unit: Middle and North Units.

   Rationale: Powerline corridors are significant interruptions of Forest Park interior forest habitat….” [↑](#footnote-ref-9)
10. Portland General Electric Company’s Longer Term Local Transmission Plan For the 2014-2015 Planning Cycle  
     [↑](#footnote-ref-10)
11. See https://portlandgeneral.com/outages-safety/safety/tree-maintenance. [↑](#footnote-ref-11)
12. Appendix F. PGE’s Existing Utility Easement in Forest Park, p. 6 of the PDF. [↑](#footnote-ref-12)