



January 10, 2023

Public Utility Commission of Oregon  
Attn: PCN 5  
PO Box 1088  
Salem, OR 97308-1088

Submitted via email: [puc.filingcenter@puc.oregon.gov](mailto:puc.filingcenter@puc.oregon.gov)

RE: Docket PCN 5

Dear Commissioners Hardie, Bloom, and Decker:

The Oregon Public Utilities Commission (OPUC) confronts its mission. Idaho Power is proposing the Boardman to Hemingway powerline corridor through Eastern Oregon (B2H). It will scar our communities, farmlands, watersheds, natural resources, and more. Docket PCN 5 is a significant permitting step for B2H to transmit energy benefits to Idaho. However, Oregon citizens and resources will bear the burden! Not acceptable - let me count the ways.

1. Climate Change

Make no doubt. B2H is an intergenerational decision. I look at my 4th grade grandson and wonder if “his” generation is watching “my” generation with abated breath as humanity rushes into a catastrophe that only climate change can deliver. Death by a thousand papercuts labels B2H, especially given how it cuts a wide swath beyond its corridor clearcuts.

The Oregon Climate Change Research Institute (OCCRI) published the 2023, *Sixth Oregon Climate Assessment*.<sup>1</sup> I incorporate by reference the 2023 *Assessment* and provide its Executive Summary as Attachment A. Specifically, I want the OPUC to consider this OCCRI statement:

**Built environment.** Because land-use laws control development, they affect mitigation of and resilience to climate change. Recent reforms of Oregon’s land-use and housing laws, and related regulations and policy, support reduction of greenhouse gas emissions, carbon sequestration, increasing community resilience, and more equitably distributing environmental benefits and burdens. Full integration of climate science and equity considerations into land-use plans and actions could enable Oregon to respond to climate change even more effectively.

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<sup>1</sup> Fleishman, E., editor. 2023. *Sixth Oregon Climate Assessment*. Oregon Climate Change Research Institute, Oregon State University, Corvallis, Oregon. <https://blogs.oregonstate.edu/occri/oregon-climate-assessments>.

After years of observing B2H/Idaho Power, I'm not sure it meets *Assessment* goals. B2H shifts project costs and burdens to Oregon and to future generations. Yet, what features make it a benefit to battle climate change? Idaho Power is failing its Oregon stewardship responsibilities.

OPUC should make B2H decisions that “*respond to climate change even more effectively.*”

## 2. Rural and Frontier Community Resiliency

A dynamic rethinking of energy is required. OPUC policy and its public interest goals should aim at combining generation sources with transmission links. Community resiliency, by necessity, demands local renewable generation systems integrated with local battery storage capabilities and other emerging technologies. B2H moves Idaho Power in the opposite direction.

Stop B2H Coalition and others have espoused a two-tiered approach to meeting energy demands. I defer to their comments and sum as follows:

Tier 1: Build residential distribution systems to strengthen local and regional community resiliency. Build renewables close to load. Individual rooftop generation sources can easily meld with community sources and with energy storage. Micro-grids can allow communities to aid each other while hardening regional emergency management systems.

Tier 2: Upgrade existing transmission lines for industrial customers. Map local needs, then design targeted systems to deliver energy transmission enhancements for renewable sources. Allow certain carbon-based generators limited operations to address resource inadequacies, such as low renewable generation times or peak demand loads. Carbon sources, however, should be closed.

What blocks this from happening? Nothing more than shareholders being compensated for lost revenue or cost shifting. Regardless of corporate pocketbooks, community resiliency must be built. Use the recently released [Building a Clean Energy Economy: A guidebook to the Inflation Reduction Acts Investments in Clean Energy and Climate Action](#) as a strategic guide.

## 3. Transparency and Facts

A structural challenge confronts climate change and resiliency efforts. “We the People” must rely on Idaho Power (and others) to provide validated information. However, Idaho Power has earned distrust. This reality compounds a perceived weakness of OPUC authority to ferret factual data and to enforce action.

OPUC accepted the Energy Facility Siting Council (EFSC) record as whole. Understandable, but disappointing given its numerous flaws. The record should not be accepted for the “truth of the matter.” The exposed problems continue, including just these few:

- A. Idaho Power may have more capacity on its existing transmission lines than reported.
- B. Idaho Power is using lower energy costs in their modeling than actual costs in the Mid-C, thus undervaluing the actual cost.
- C. Non-Idaho Power rate payers will pay more due to increased rates for any use of the B2H for energy transfer.

Half-truths and obfuscation are an unprecedented assault on our democratic institutions. OPUC must ensure data underpinning massive public projects are factual, transparent, and reliable.

-- No facts, No permits, No way --

#### 4. Who makes Decisions and When

For Oregon, B2H is myopic thinking. The route goes through our counties while providing little benefit to most Oregonians. Idaho Power asserts more transmission of Oregon energy to Idaho is needed to meet its renewable energy goals.

Under scrutiny, however, their B2H assumptions support Idaho Power shareholder goals. The B2H project secures long-term Idaho Power revenue growth, which conflicts with Oregon's needs and resources. "Seventh generation" planning and development for climate change is only window dressing for B2H/Idaho Power.

I reject B2H as a solution, or even as a contender for satisfying Idaho Power's renewable energy goals. Their achievements to date are not stellar. I ask the OPUC to fully step into its regulatory role to demand accountability. Exercise leadership to thereby achieve ...

*Our mission is to ensure Oregonians have access to safe, reliable and fairly priced utility services that advance state policy and promote the public interest.*

#### 5. Regulatory Capture

Regulatory capture is a new phrase to me, but certainly not a new concept. On September 26, 2017, Idaho Power briefed the 2017 IRP to the OPUC. They asserted their 2017 IRP would provide data for the 2017-2036 planning period. It was inadequate at best.

I submitted comments to Docket LC 68 on March 13, 2018 (Attachment B). In review, they are as unanswered today as they were five years ago! I'd like to remind the OPUC of my 2018 ask:

I encourage OPUC commissioners to "Not Acknowledge" Action Item #6:  
Conduct preliminary construction activities, acquire long-lead materials,  
and construct the B2H project.

My 2018 concerns were based on data Idaho Power relied upon in their statements and assertions. I looked for validation. However, transparency was not the watchword. Once again, the OPUC should hold firm on accepting and producing only verified data and information regarding the following:

- A. Identify sufficient resources to reliably serve the growing demand for energy within Idaho Power's service area throughout the 20-year planning period.
- B. Ensure the selected resource portfolio balances cost, risk, and environmental concerns.
- C. Give equal and balanced treatment to supply-side resources, demand-side resources, and transmission resources.
- D. Involve the public in the route planning process in a meaningful way.
- E. Idaho Power asserts increased demand. What data points?

- F. Ensure grid security and reliability. Accurately represent grid status, ability to monitor and manage fluctuations, and flexibility as new technologies and markets emerge.
- G. How does Idaho Power support community resiliency?
- H. Battery technology is evolving with energy efficiency and conservation. Idaho Power is lacking in the deployment planning of storage technologies, energy efficiency, and conservation for the timeframe 2017-2036.
- I. How did Idaho Power balance cost, risk, and environmental concerns in the 2017 IRP given climate change? What is their overall contribution? What commitments are they making on our behalf?
- J. B2H locks future generations into a questionable commitment. Who will pay for B2H?
- K. Does Oregon need the B2H transmission line? Is it “lowest-cost” when considering a 2017-2036 timeframe and the above questions?

OPUC approved Docket LC 68. B2H was the only transmission resource option Idaho Power analyzed for 2017-2036. When you have only a hammer, everything is a nail. Now, Idaho Power is back hammering rehashed data, information, assertions, and statements. In what ways did Idaho Power clarify their data and information in response to agency and public comment?

Stop regulatory capture. Set a new energy course for Oregon. It begins with making regulatory decisions to mitigate climate change:

- Climate action supports rural and frontier community resiliency.
- Public discourse is rooted in transparency and facts.
- Measures in place prior to “blunt-force trauma” reaching our communities.

If all the OPUC, EFSC, Idaho Power, and public do is engage in B2H regulatory capture, then Oregon suffers the consequences. Northeast Oregon energy projects should provide net energy benefits to Oregon, rather than providing energy benefit to Idaho and Treasure Valley expansion.

B2H shows an informed public working with empowered Oregon decision makers can make a difference on creating alternatives to B2H. OPUC can make it happen by using its regulatory authority to achieve real aims, such as those in the OPUC Mission Statement and in the OCCRI *Assessment*. I expect our state agencies to strengthen our communities, not Idaho Power.

*B2H does not advance state policy or promote the public interest – PCN 5 should be terminated*

To close, I am a member of Stop B2H Coalition and incorporate their comments by reference. A list of specific issues for PCN 5 is provided as Attachment C. I look forward to an OPUC decision that supports the future of our great State of Oregon.

Sincerely,

/jrw/

James R. (JR) Wilkinson

Attachment A – Executive Summary, *Sixth Oregon Climate Assessment*

Attachment B – Wilkinson LC 68 Comments

Attachment C – List of concerns from OPUC Hearing

# Sixth Oregon Climate Assessment



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Oregon Climate Change Research Institute



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## **Acknowledgments**

This sixth Oregon Climate Assessment is consistent with the charge of the Oregon Climate Change Research Institute under Enrolled House Bill 3543 of the 74th Oregon Legislative Assembly.

We are grateful to the many authors, other contributors, reviewers, and advisors to this assessment. We welcome readers to contact us with ideas for ensuring that the sustained assessment process is relevant to their priorities.

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# Sixth Oregon Climate Assessment • January 2023

## Executive Summary

Established and emerging understanding of observed and projected climate change in Oregon, and knowledge of the opportunities and risks that climate change poses to natural and human systems, may serve as a resource for actions such as equitable planning for mitigation of climate-related natural hazards and implementation of Oregon's 2021 Climate Change Adaptation Framework.

### State of Climate Science

**Temperature and precipitation.** Oregon's annual average temperature increased by about 2.2°F per century since 1895. If greenhouse gas emissions continue at current levels, annual temperature in Oregon is projected to increase by 5°F by the 2050s and 8.2°F by the 2080s, with the greatest seasonal increases in summer. Precipitation is projected to increase during winter and decrease during summer, and the number and intensity of heavy winter precipitation events is projected to increase. Furthermore, the proportion of precipitation falling as rain rather than snow is expected to increase.

**Arctic amplification.** The contribution to severe weather in Oregon from disproportionately rapid warming in the Arctic (Arctic amplification) is uncertain, but is likely to be small. Some evidence suggests that midlatitude westerly winds are becoming wavier, allowing Arctic air to move south, and that loss of sea ice contributes to extreme winter precipitation. There is greater certainty that Arctic amplification is contributing to summer heat waves and hot, dry autumn weather.

**Wind speeds.** Wind patterns affect provision of electricity, transportation safety, and the spread of wildfires and pollutants. Mean wind speeds in Oregon are projected to decrease slightly, but extreme winter wind speeds may increase, especially in western Oregon. The frequency of strong easterly winds during summer and autumn, however, is projected to decrease slightly.

**Current climate models.** Most projections and analysis of future climate impacts still are based on the suite of global climate models from the fifth phase of the Coupled Model Intercomparison Project (CMIP5), and inferences based on these

models remain valid and useful. Projections from models in the sixth phase (CMIP6), which reflect slightly different assumptions about emissions and improved understanding of the Earth system, are being evaluated and are becoming more accessible. As the CMIP6 models are refined, it may become worthwhile to update climate impacts assessments.

### Climate-Related Natural Hazards

**Extreme temperatures.** The number of days that are warmer than 90°F and nights that are warmer than 65°F is increasing across Oregon, although extreme cold will still be possible in the coming decades. The Oregon Occupational Safety and Health Administration's new regulations on workplace heat exposure are based on thresholds of the heat index, which accounts for both air temperature and relative humidity. Warming over extensive areas, rather than increases in relative humidity, is the main driver of projected future increases in extreme heat index values in Oregon.

**Drought.** Over the past 20 years, the incidence, extent, and severity of drought in the Northwest increased. Low precipitation contributed to each drought, but temperature and snowpack also affected drought severity and impacts on agriculture, fisheries, and other sectors. As summers in Oregon continue to become warmer and drier and mountain snowpack decreases, the frequency of droughts, particularly snow droughts, is likely to increase.

**Changes in the water cycle.** Since the mid-late 1900s, 20 of Oregon's glaciers disappeared; none remain in the Wallowa Mountains. Glacier retreat accelerated during the past 30 years, in part due to human-caused climate change. Public participation in science, or community science, is a powerful means of filling data gaps and improving models of precipitation and water availability. The Community Collaborative Rain, Hail and Snow network (CoCoRaHS), Community Snow Observations (CSO), and Mountain Rain or Snow are compelling illustrations of public contributions to advancing climate science and its applications.

**Wildfire.** Total annual area burned in Oregon has increased during the last 35 years. As aridity increases,

the likelihood of extreme fire weather is increasing, and the area burned by lightning-caused fires in central Oregon is projected to increase. Following extensive wildfires in 2020, Oregonians took personal action and also assisted their communities in becoming more resilient. Survey results suggest relative high levels of support for climate mitigation and adaptation policies. Survey results also indicate widespread concerns about the impacts of smoke on personal health and highlight potential benefits of providing public smoke-related information and distributing protective equipment.

**Coastal hazards.** Relative sea-level rise rates are slower in Oregon than in many other coastal regions of the United States. Nevertheless, sea-level rise threatens buildings and offshore and coastal transportation networks. Additionally, local erosion and flooding along the Oregon coast tends to be high during major winter storm seasons. Adaptation measures being implemented or considered in coastal Oregon include hard structures, natural structures, and nonstructural policies and regulations, such as zoning restrictions and relocation of communities.

### Adaptation Sectors

**Economics.** Understanding the magnitude of the economic effects of climate change is critical for evaluating trade-offs of mitigation and adaptation policies. Climate change may significantly affect the availability and use of water and irrigation in Oregon's agricultural sector and change the composition of Oregon's timberlands. Financial incentives could encourage forest landowners to sequester carbon in a cost-effective manner. Oregon's oceans and coasts can harness wave and offshore wind energy while generating sustained economic profit and job opportunities.

**Natural systems.** Responses of species and ecosystems to climate change and its interactions with other environmental changes are highly variable. Extreme heat can reduce tree growth and increase tree mortality, but trees' susceptibility is affected by topography, acclimation, water availability, and other factors. The near-term and long-term causes and consequences of foliage scorch and heat stress remain uncertain. Conservation priorities for cold-water fishes, such as salmon and native trout, have tended to discount low elevation, seasonally warm

waters. However, water bodies that are too warm for salmonids during summer may be ideal during other seasons. Use of both seasonally cold and warm waters may support growth and persistence of Oregon's native fishes.

**Built environment.** Because land-use laws control development, they affect mitigation of and resilience to climate change. Recent reforms of Oregon's land-use and housing laws, and related regulations and policy, support reduction of greenhouse gas emissions, carbon sequestration, increasing community resilience, and more equitably distributing environmental benefits and burdens. Full integration of climate science and equity considerations into land-use plans and actions could enable Oregon to respond to climate change even more effectively.

**Public health.** The composition of wildfire smoke, and therefore its effects on public health, is highly variable. Exposure to wildfire smoke can lead to mortality and adverse respiratory and cardiovascular outcomes, and may affect pregnancy and birth outcomes. Increasing co-occurrence of wildfire smoke and surface ozone during summer can exacerbate negative health outcomes. Such exposures and associated hospital admissions also stress the capacity of the health care system.

**Tribal resilience.** Climate change places disproportionately high stresses on tribal communities, yet tribal adaptation to environmental and social change over millennia can enable unusually high resilience. Early career tribal citizens and their communities are responding to climate change via ceremony, political action, workforce development, environmental stewardship, and youth education and fellowship, thereby exercising self-determination and reclaiming sovereignty despite inequities.

**Social systems.** Visual artists are informing viewers about climate change, engaging audiences in conversation and information sharing, and catalyzing cultural evolution and transformation. In Oregon's agricultural sector, efforts to restore and sustainably manage degraded soils (practices often referenced as regenerative agriculture) are expanding. Under some circumstances, these practices also can increase short-term or long-term carbon sequestration.

The full Sixth Oregon Climate Assessment is available at [blogs.oregonstate.edu/occri/oregon-climate-assessments](https://blogs.oregonstate.edu/occri/oregon-climate-assessments).

## Introduction

Consistent with its charge under Oregon House Bill 3543, the Oregon Climate Change Research Institute (OCCRI) conducts a biennial assessment of the state of climate change science, including biological, physical, and social science, as it relates to Oregon and the likely effects of climate change on Oregon. This sixth Oregon Climate Assessment builds on the previous assessments by continuing to evaluate past and projected future changes in Oregon's climate and water supply. Like the fifth assessment, it is structured with the goal of supporting the state's mitigation planning for natural hazards and implementation of the 2021 Oregon Climate Change Adaptation Framework.

The first section of this assessment, *State of Climate Science*, reflects OCCRI's sustained appraisal of observed trends and future projections of temperature, precipitation, and other major climate variables. Previous key messages about projected changes in Oregon's climate, such as warmer temperatures, drier summers, and an increase in the frequency, duration, and severity of drought, remain consistent. *State of Climate Science* summarizes emerging evidence related to potential effects of Arctic warming on the state's climate and explores the likelihood of changes in annual and seasonal wind speeds. The section also compares the latest two generations of global climate models, including their assumptions about emissions of greenhouse gases and their accessibility.

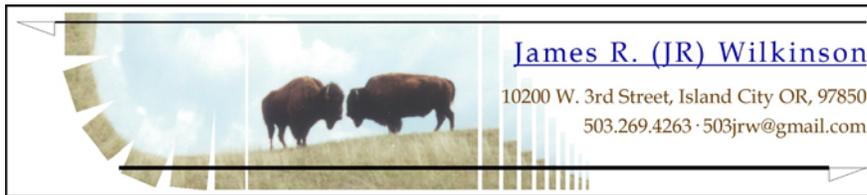
The second section of this Oregon Climate Assessment delves into the expected effects of climate change on natural hazards, including extreme temperatures, drought, changes in the water cycle, wildfire, and coastal flooding and erosion. Glaciers and perennial snowfields in Oregon retreated rapidly during the past 30 years, reducing storage of water that otherwise would be released during late summer. The section details the contributions of tens of thousands of weather stations to PRISM, the most widely used source of mapped climate data in the United States, and explains how public participation in science is becoming a powerful means of filling data gaps and improving models of precipitation and water availability. The increasing incidence and size of wildfires, whether ignited by human activity or lightning, are strongly linked to episodic drought and long-term increases in aridity. Two surveys conducted after extensive wildfires in 2020 suggest relatively high support among Oregonians for climate mitigation and adaptation policies. Survey results also indicate widespread concerns about the impacts of smoke on personal health and desires for greater access to smoke-related information and protective equipment.

The third section of this assessment addresses six sectors within which Oregon's 2021 Climate Change Adaptation Framework aggregates vulnerabilities and strategic responses: economy, natural world, built environment and infrastructure, public health, cultural heritage, and social systems. The section begins with a robust discussion of economic concepts and tools relevant to understanding climate challenges and opportunities, and highlights recent insights on the effects of climate change on economic activity in Oregon. Contributions related to natural systems underscore that observations of short-term ecological stress from climate extremes, such as foliage scorch, may or may not indicate long-term effects on mortality and nutrient and water cycles. Furthermore, new research questions whether salmonids in the Pacific Northwest may be more tolerant of high water temperatures than previously assumed. Next, the section investigates how reforms of Oregon's land-use and housing laws are supporting reduction of greenhouse gas emissions, increases in community resilience, and more-equitable distribution of environmental benefits and burdens.

Contributions related to public health in this assessment concentrate on the effects of wildfire smoke on human health and the health care system, and the fact that wildfire smoke and high

surface ozone levels increasingly tend to occur on the same days during summer. The health risks of exposure to fine particulate matter (PM<sub>2.5</sub>) are fairly well understood, but many other uncertainties remain, such as the health effects of repeated smoke exposure and relations between health responses and the composition of smoke. Early career tribal citizens share the ways in which their communities are responding to climate change, exercising self-determination and reclaiming sovereignty despite historic and contemporary inequities. The section also explores how visual artists are communicating with the public about climate change, engaging audiences in conversation and encouraging creative problem-solving. Furthermore, the section examines regenerative agriculture, an increasingly popular set of practices that aims to restore and sustainably manage degraded soils.

Both the Climate Change Adaptation Framework and this assessment recognize that the myriad interactions and feedbacks among natural and human systems are complex and can be difficult to differentiate. An iterative assessment process can indicate the extent to which natural hazards may affect adaptation sectors, and inform selection of actions to maximize livelihoods and well-being.



March 13, 2018

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RE: Docket LC 68, Idaho Power Company 2017 Integrated Resource Plan (IRP)

Dear Commissioners Hardie, Bloom, and Decker:

I humbly request my comments regarding Docket LC 68 be considered by members of the Oregon Public Utility Commission (OPUC). Your leadership is crucial. Idaho Power Company offers its 2017 Integrated Resource Plan (IRP) as a vision for 2017-2036. Therefore, future generations will bear its costs and risks. Let's be prudent.

There is dissonance in the record regarding the 2017 IRP and the Boardman to Hemingway (B2H) transmission line. A decision-making body, and me as a member of the public, should expect transparency in Idaho Power's decision processes, completeness in its data sets and assumptions on which decisions rest, and thoroughness in their information.

On September 26, 2017, Idaho Power briefed the 2017 IRP to the OPUC. They claimed their 2017 IRP will for the 2017-2036 planning period:

- Identify sufficient resources to reliably serve the growing demand for energy within Idaho Power's service area throughout the 20-year planning period.
- Ensure the selected resource portfolio balances cost, risk, and environmental concerns.
- Give equal and balanced treatment to supply-side resources, demand-side resources, and transmission resources.
- Involve the public in the planning process in a meaningful way.

However, **their only transmission resource option for 2017-2036 was the B2H route!** Idaho Power assumed increased demand when that appears not true. Such contradictions serve to repeat past mistakes, stifle innovation, and impair our commitment and investment to reduce climate change contributions. With rapidly evolving technology and changing consumer demands, locking future ratepayers into a \$1-1.2 billion transmission line should be avoided.

Assumed increased demand by Idaho Power is one example of unresolved dissonance. I put forth the following for consideration:

- I read reports challenging Idaho Power Company's forecasts for future electric demand. Since the B2H transmission line is a multi-generational contract, these forecasts must be based a realistic and verified assumptions and data.
- Grid security and reliability are fundamental to our well-being and growth. How does the 2017 IRP provide measurable steps towards ensuring grid security and reliability? Have they accurately represented their grid status, their ability to monitor and manage fluctuations, and their flexibility as new technologies and markets emerge?
- Local, distributed generation provides for community resiliency, especially given the potentials for large-scale, catastrophic events. Does the 2017 IRP support this goal?
- Battery technology is evolving as is energy efficiency and conservation. We should be leading the deployment of storage technologies, energy efficiency, and conservation for the time period 2017-2036.
- How did Idaho Power balance cost, risk, and environmental concerns in the 2017 IRP given climate change? What is their overall contribution? What commitments are they making on our behalf?
- Who pays for B2H? Is this a financial burden we want our children to inherit? An immediate B2H decision locks future generations into a questionable commitment.
- Fundamentally, is the B2H transmission line needed? Is it "lowest-cost" when considering a 2017-2036 timeframe and the above questions?

To conclude, Idaho Power failed to demonstrate the need to proceed with the B2H transmission line. Please expect transparency in their decision processes, completeness in their data sets and assumptions, and thoroughness in their information. We should ensure future generations can sustainably manage what resources we were given.

**I encourage OPUC commissioners to "Not Acknowledge" Action Item #6:**

Conduct preliminary construction activities, acquire long-lead materials, and construct the B2H project.

I see no need to rush to a decision given the considerable, unresolved dissonance in the record. Thank-you for your service and for staffs' efforts.

Sincerely,

/s/ JRW

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*Attachment C – List of Concerns gathered from OPUC Hearing  
Prepared by James R. Wilkinson*

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OPUC held a public hearing in La Grande OR, on November 16, 2022. I videotaped the event on behalf of the Stop B2H Coalition. In my words below, I share these concerns:

- B1. Address the climate crisis. Fossil fuel industries like Idaho Power continue destructive path.
- B2. B2H is old technology being sold in Oregon to meet tomorrow's energy needs in Idaho.
- B3. Idaho Power is an out-of-state utility. Oregon has no obligation.
- B4. Idaho Power/B2H did not follow the NEPA route through Union County.
- B5. Idaho Power has yet to provide a verifiable B2H budget.
- B6. Any rate hikes to account for B2H should be denied.
- B7. Pacific Corp is listed as a partner but has not agreed to such. No acknowledgement of B2H.
- B8. BPA is listed as a partner but has not agreed to such. No acknowledgement of B2H.
- B9. Pacific Corp and BPA need to take responsibility for their share of the project.
- B10. EFSC issued B2H site certificate. OPUC accepted the EFSC record and the flaws therein.
- B11. Idaho Power stated a need; a need not shared in Oregon.
- B12. Whether the project is needed to meet Idaho Power goals is also contested.
- B13. Idaho Power produced a 2022 B2H cost estimate that is the same as 2016. How is this possible?
- B14. What are the costs of mitigation and litigation of noise, weeds, wildfire?
- B15. EFSC required Idaho Power to post a \$1.00 bond. Is this true?
- B16. Idaho Power chose the route by the Baker City Oregon Trail Interpretive Center. They found B2H to have no adverse impact on Oregon Trail remnants. Not correct on a wide range of issues.
- B17. Economic impact of B2H on Oregon Trail communities also was not evaluated.
- B18. Landowner suggested upgrading existing transmission corridors.
- B19. Protect plants and animals from habitat disruption.
- B20. In 2008, Idaho Power first proposed B2H. It was to be completed by 2016. Union County route chosen by wealthy landowner who no longer lives in the area.
- B21. Windmill on property documents high winds. Landowner expressed concerned about potential wind damage to proposed towers and lines and the rapid spread of wildfire.
- B22. Landowner approached about construction access. He received conflicting information.
- B23. Protected lands not being respected.
- B24. Neighbors to B2H construction access roads have received no detailed information on corridor construction activities.
- B25. Access road construction exposes neighborhoods with children to blasting and heavy truck traffic.
- B26. Construction will occur near the Grande Ronde Hospital. It will be impacted.
- B27. There is known surface slide in the Grande Ronde Hospital area.
- B28. Nearby residents bear the burden to prove excess corona noise levels from power line transmission.
- B29. B2H is too close to La Grande. Any wildfire could be devastating.
- B30. Idaho Power chose the route by Morgan Lake and found no significant impact. People who live nearby dispute this. They are concerned about its impact, including the spread of noxious weeds.
- B31. Use existing transmission corridors.
- B32. Consider routes along the interstate highway.
- B33. Bury the lines.
- B34. Farmers have lost out in the process. Some do not have internet, resources, or time to participate.
- B35. No member of the public in Northeast Oregon has spoken in favor of B2H.
- B36. Public participation is more than checking a box.
- B37. In 2017, OPUC approved "acknowledgement of need" based on Idaho Power's 21% burden of the \$1.2 billion project. Once again, B2H comes before the OPUC yet nothing has really changed.
- B38. People are caught in a vicious regulatory cycle. State not ensuring meaningful B2H public involvement, improvement, or outcome.