

To: PUC.PublicComments@puc.oregon.gov

Subject: Susan Geer, representing Whitetail Forest LLC and Glass Hill State Natural Area, comments on PCN 5 Idaho Power application for Certificate of Public Convenience and Necessity – CPCN

Dear OPUC members,

Alternative routes need to be considered per the new PCN rules.

In their review process, the Energy Facility Siting Council considered only the routes provided in the Application for Site Certificate (ASC) and did not require Idaho Power to consider any of the better alternatives.

First, I will list superior Alternatives not included in the Application for Site Certificate (ASC), and therefore not reviewed by EFSC. These alternatives are not mutually exclusive, and all are better than Idaho Power's intended route. Next, I specifically object to Idaho Power's choice of the Morgan Lake Alternative (now their intended route) which is the most environmentally sensitive of any alternative suggested for Union County.

1. The best and most obvious alternative to the B2H is decentralized energy production, or microgrids. **Provide energy closer to customers through decentralized energy generation and resources.** Mega-transmission lines are outdated and should be a thing of the past. The B2H is vulnerable for over 300 miles to fire, wind, and terrorism or vandalism. It calls for massive clearcutting and roadbuilding plus condemnation of unwilling landowners and impacts to areas that should have been protected. Much has changed since the old Idaho Power energy plans (IRPs) were acknowledged. From Energy.gov, "Microgrids support a flexible and efficient electric grid by enabling the integration of growing deployments of distributed energy resources such as renewables like solar. In addition, the use of local sources of energy to serve local loads helps reduce energy losses in transmission and distribution, further increasing efficiency of the electric delivery system."
2. The second-best alternative, which could be done in conjunction with the above: Build an underground direct current (DC) line along the railroad right of way, or the interstate (with EV charging stations). Unlike the B2H, this is both secure and forward-thinking, plus avoids further environmental damage and land condemnation.
3. The third-best alternative: Use the Central Oregon Right of Way (ROW) that goes N-S from Boardman area - to the [368 corridors](#) (aka West-Wide Corridor) - going E-W directly to Hemingway. This was the federal corridor that was supposed to minimize issues like we are facing today with this CPCN. **This should be utilized, if capacity is really needed.**

4. A part of any and all alternatives should be: underground install the B2H for 1.7 miles in front of the National Historic Oregon Trail Interpretive Center in Baker County. The Interpretive Center is positioned for a sweeping dramatic view of the sagebrush sea as much like it was as settler's first viewed it along the Oregon trail. This is not compatible with aboveground mega transmission line. Further, sagebrush habitat is rapidly disappearing across the west, impacting an array of rare plants and animals.
Undergrounding the line is feasible and has been raised frequently, but as with the other better alternatives, it was not in the Applicant's ASC, so not considered by EFSC.
5. Finally, in Union County, even should the better alternatives listed above be ignored, clearly the **Agency preferred route** aka "Glass Hill alternative" several miles to the west of La Grande is the least harmful of the alternatives presented in the BLM and USFS Environmental Impact Statements (EISs dated 2017 and 2018) and it is the route **selected** in both agency Records of Decision (RODs).

The Agency-preferred route is superior to the Morgan Lake alternative in several ways: it avoids the popular Morgan Lake City Park, it avoids the fragile and unique Twin Lake (aka Little Morgan) wetlands including sandhill cranes and bald eagle nesting sites, it avoids Glass Hill State Natural Area including special plant communities and a series of wet meadows that encompass the largest population of rare Douglas clover (Federal Species of Concern) in the state, and it avoids known habitat for a newly discovered unnamed rare species of *Pyrracoma* (goldenweed). The agency preferred route is on dry upland ridges, vs. the series of wet and moist habitat areas of the Morgan Lake alternative, which are more critical to wildlife. Thus, the **Agency-preferred route is less environmentally impactful** than the Morgan Lake Alternative.

Furthermore, the **Agency-preferred route impacts fewer people** as well. Being several miles west of town, the Agency -preferred route avoids numerous rural homes facing corona noise intrusions that are predicated to exceed the state's noise control standards. The number of people visiting and enjoying the outdoors is exponentially fewer on the privately held, rarely visited dry ridges of the Agency-preferred route compared to recreation at Morgan Lake Park, and non-motorized recreation and numerous nature viewers who visit Twin Lake wetlands and Glass Hill State Natural Area.

The remainder of my comments are on the December 8 workshop notes and how Idaho Power came to select Morgan Lake as their intended route, even though it is the most vulnerable to environmental damage. I will also explain how the laws of the state of Oregon, as interpreted by Idaho Power and the EFSC, have thus far failed to protect sensitive species and habitat.

I have reviewed Idaho Power Company Powerpoint and "Supplemental Notes to December 8, 2022 Workshop Presentation Docket No. PCN 5". Below is an excerpt from page 4, followed by my comment.

Staff Topic 8 (Slides 29 and 30)

Explain the difference between the BLM route and EFSC B2H route for which IPC is seeking the CPCN certificate in terms of physical differences, cost differences, utilization/benefits differences and differences in impacts on private vs. public lands and other environmental attributes including wildlife, vegetation, noise levels for impacted residents, project timeline and any other factors that were considered in comparing these two routes.

Most of this discussion was captured under the routing constraints that were presented under the previous topic.

The BLM route and the EFSC B2H route are very similar with a few key differences.

Idaho Power has worked to develop an acceptable route through Union County for over a decade. Early on, Idaho Power considered the Glass Hill Route, along with at least one other route in the vicinity of Morgan Lake. However, the Glass Hill Route was confronted with substantial backlash from the affected landowners and other interested parties, some of which formed the Glass Hill Coalition specifically to challenge that route. The Confederated Tribes of the Umatilla Indian Reservation also expressed disfavor for the Glass Hill Route due to impacts to cultural resources. The Morgan Lake Alternative was developed in response to those concerns, as well as in response to a request made by one of the affected landowners during the federal NEPA process to locate the route closer to the border of their property rather than bisecting it. The Mill Creek Route was also developed during the NEPA process, in response to the Union County's request to site the project in parallel with the existing 230-kv line.

Based on feedback received from the community, Idaho Power has elected to pursue the Morgan Lake Alternative. This route is out of the viewshed of the Grand Ronde Valley and more rural in nature. The two areas are both Private land and do not impact public vs private land.

Analysis for the Morgan Lake Alternative, as compared to others, was cursory. It is found in 2017 Supplemental Siting study of Idaho Power's ASC. The Idaho Power Company (IPC) statement that the BLM route and EFSC B2H route are "similar with a few key differences" is very far from the truth. Please refer to Petitioner Mike McAllister's comparative analysis for his proposed Contested Case with the EFSC which fully details large differences in impacts to soil site productivity, forest and Range vegetation communities, fish habitat, wildlife habitat, recreational resources, scenic resources, and wildfire fuel risk. This is in addition to the environmental impacts to species and habitats in Glass Hill State Natural Area and Morgan Lake Park that I mention in the preceding paragraphs.

IPC's statement "Glass Hill Route was confronted with substantial backlash from the affected landowners and other interested parties, some of which formed the Glass Hill Coalition specifically to challenge that route. " is also misleading. Mike McAllister, who was present, states "To make any inference that people with the Glass Hill endorsed the Morgan Lake Route is fraudulent. Members of the Glass Hill Coalition were against IPC's original proposed route down "Cowboy Ridge." The Morgan Lake Route is an even worse variation of the Cowboy Ridge Route". Indeed, I have not been able to locate any of our neighbors who endorse the Morgan Lake Route, save Brad Allen, who is no longer a landowner there.

Another IPC statement "Based on feedback received from the community, Idaho Power has elected to pursue the Morgan Lake Alternative," is also extremely misleading. Idaho Power included only the Morgan Lake alternative and the Mill Creek alternative in it's Application to the State. The Mill Creek alternative is partly in town and affects the largest number of fulltime dwellings and very unstable hillslopes; in fact it runs through the edge of town. It is an extremely poor choice, and only one other alternative was offered: the Morgan Lake alternative. With such a choice, it is no wonder that "based on feedback from the community, Idaho Power has elected to pursue the Morgan Lake Alternative". It really was no choice at all. In fact it seems that Mill Creek was meant as a decoy, to defuse the fallout from proposing Morgan Lake route.

Public costs of the Morgan Lake alternative far outweigh the benefits. Oregon's botanical treasures and special native plant communities should be preserved now and for future generations, particularly when they occur in natural areas and parks. The PUC should deny Idaho Power's application.

Sincerely,

Susan Geer

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