

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

IN THE MATTER OF IDAHO POWER COMPANY'S, PETITION FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY.	Docket: PCN 5 Intervenor Opening Testimony Sam Myers
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Date: January 17, 2023

Sam Myers, Intervenor

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On page 14 IPC suggests that it has incorporated “safety, reliability and performance in to the design of the transmission line” IPC goes on to suggest that IPC “Design standards are stringent” and the line would withstand “extreme events”. These statements are not completely true if we research the maximum wind load speeds for the towers we find that they do not meet the most stringent standards at all. In the proposed order IPC uses less than a “stringent” set of standards. In the Proposed Order (PO) we see IPC using the ASCE standards which are considerably lower (94-110 mph max wind load) than the Oregon Building Codes standards. The Oregon Building Code state map reveals a 135-145mph max wind load standard for critical building structures in this area. This standard is much higher than the 94-112 mph max wind load standard IPC is using. This represents the failure of IPC to adequately design the transmission line with correct consideration of true landscape conditions.

Idaho power is fraudulently misrepresenting the standards that they are using. And therefore **severely** under estimating the maximum wind load speeds and the effect on the transmission line’s: reliability, safety, and performance.

The maximum wind load design speed impacts everything. The poorly designed transmission line can fail through: tower collapse, line sway or slap, or downed line. These failures are more pronounced as described in the research of Joseph Mitchell’s article: “Power Lines and Catastrophic Wildland Fire in Southern California” in his evaluation: line failures increased as wind speed also increased. Joseph Mitchell has done research on 500kv line faults; these transmission line faults are real and do happen. With the under engineered maximum wind load design speeds, we can easily create more line failures etc. Potentially ending up in a devastating

fire and developing long term soil loss situations. We can determine that the IPC's characterization of performance levels is not correct and are in fact grossly misrepresented. IPC is showing fraudulent research and misrepresentation of critical powerline project factors and one can't help but see this and assume they are intentionally misleading the public and those that will be directly impacted by this project.

Referencing page 26 of the IPC application they discuss the alternative routes, however they do not analyze critical standards involved in making an alternative route that takes the line away from high winds and impacting cropland. The Oregon department of AG has developed a website that shows the continued loss of cropland is an immediate concern. IPC has not adequately analyzed an alternative route that, as much as possible, avoids the cropland impacts and also avoids the high wind area in Morrow County. The IPC should have routed the transmission line south of the highest max wind load speed boundaries where it also avoids the dryland cropland. IPC should be choosing a route south of Gleason Butte where the line would traverse in much lower wind load speed areas and also avoid cropland. This move to a southern route would mostly impact sage brush and pastureland. Again IPC could have chosen a much less risky environmental location and also minimized cropland losses.

On page 30 of the IPC application they begin the discussion of their fire prevention actions "during operation." Unfortunately, IPC wildfire Mitigation Plan is critically flawed. IPC has failed to recognize our specific area in east Morrow County as a high risk fire zone. This seems to be an error of more than neglect and reveals IPC's desire to escape responsibility from fires caused by their transmission lines.

The record shows in attachment U-3: Draft Fire Prevention and Suppression Plan, dated September 2018, IPC admits, during operation, weather conditions are in fact contributing factors to line ignition.

“During operation, the risk of fire is primarily from vehicles and maintenance activities that require welding. Additionally, weather events that affect the transmission line could result in the transmission line igniting a fire.”

However, two years later, IPC failed to disclose the same information in the Proposed Order (PO) dated July 2, 2020 (incorrectly dated as 2019-07-02).

“During operation, the risk of fire would be primarily from vehicles and maintenance activities that require welding.”

Though they acknowledge potential fire “risk” of the proposed transmission line, it is not attributed to uncontrollable and unpredictable weather events. There is no other mention of weather events that affect the transmission line being the source of fire ignition. I would argue, and research supports that all the risks below found in the PO are amplified during a weather event.

“While uncommon, the operational risk of the proposed facility igniting a wildfire may be caused by overgrown vegetation contraction the transmission line, a tree falling on the transmission line, or from equipment failure”

IPC does admit to the possibility of the transmission line igniting fires. However they have chosen to ignore the possible damage this could cause to lives and livelihoods. IPC has not listed our area as a high risk fire zone. The main determination to the level of fire risk comes from the National Weather Service “Red Flag” warnings. These zonal warnings issued by the National

Weather Service are a revelation of both climate conditions and local vegetation conditions. Our weather service zone has statistically as high of issuances per year as other areas that are listed as high risk fire zones in the IPC's Wildfire Mitigation Plan. Conveniently IPC is dodging the responsibility to help mitigate fire disaster and provide necessary fire fighting equipment to support the local area. IPC should be responsible for any long term cropland soil damages encountered by transmission line fires. It must be noted that high winds can produce catastrophic fires over wide stretches of cropland that can produce a fire that is unstoppable. The environmental impacts from catastrophic fires have been completely underestimated by IPC. The havoc it wreaks on wildlife population, habitats, lives and livelihoods is something to be taken very seriously and not overlooked by them. Yet they continue to overlook these factors. Long term damage does occur to our dryland cropping systems when the soil encounters a fire. This damage is recognized industry wide and is completely different from irrigated cropland field burning. We have expert testimony from a neighbor that encountered cropland fire and described in detail the yield loss he experienced over six years - referenced below. Oregon State University agriculture researchers are all in agreement that dryland soils suffer greatly when damage has been done by catastrophic fire - reference upon request.

"To Whom It May Concern:

Below is the account of the effect and subsequent aftermath that fire had on soil used for wheat production on my farm in Morrow County, Oregon and is an example of the long term danger posed by fire risk.

In August of 2012 there was a fire that occurred on approximately 10 acres of a field that I own and that I have farmed since 1985. The fire was due to an ignition caused by a passing car on a nearby roadway. As previously mentioned the fire burned the remaining residue that was left after harvest (4-5 weeks prior to fire, the field was harvested). Due to the protection of the residue being removed and the heat of the fire the soil was subsequently damaged by reduction in both the lack of the conservation action that is normally due to residue coverage, and the heat killing the microbial population that lives in the top soil. In addition the damaged acres were more subject to noxious weed populations also as a result of the removal of the residue.

As a result of these conditions the next crop year produced approximately 21% less crop yield than comparable acres. The second crop year the yield was approximately 14% less. The third crop year

the yield was approximately 6% less. The fourth crop year the soil was almost back to "normal", however the noxious weeds were still present and not fully in control due multiple crop years where the crop failed to thrive.

Between the loss of crop production as well as the increase cost of weed control these acres were farmed at a loss for a total of 8 years. Had this been a wide spread event on more than just small acreage, such an event would be mortally damaging to the livelihood and sustainability to dry land wheat farm.

Thanks to new conservation practices and no till or minimum till farming the residue left on the ground after a crop is harvested not only serves as a barrier to wind and rain erosion (protecting the top soil) but it also acts as a natural barrier to noxious weed populations. The protection of this residue is of paramount importance to a sustainable farming system. Putting this resource at risk is putting valuable land and resources in jeopardy which will have a chain reaction on the ecosystem as a whole."⁷

⁷ Direct Email from Roger Morter, 2021

In conclusion, this information is to the best of my knowledge and is presented for your sincere consideration. This has taken hundreds of hours of my personal time in the last two years to correctly represent and research these concerns. I am alarmed and disappointed by IPC's negligence to these facts. My hope is that this research gets the respect and consideration that the people in Morrow County, the land, and wildlife deserve.

DATED: January 17, 2023

Respectfully Submitted,

/s/ Sam Myers

Sam Myers

EXHIBIT 1

Fire

