

# Harborton Reliability Project Phase 3

Powering our shared future

January 29, 2025



# The Staff Report is flawed



**Equates opposition  
comments with bureau  
& agency comments**



**Adopts opposition  
facts without  
evidentiary support**



**Gives an imbalanced  
evaluation  
of evidence**



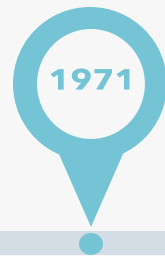
**Based on  
a flawed fundamental  
premise**

# City policy on utilities in Forest Park



## Forest Park Dedicated

Electric transmission (BPA) already existed in the park.



## Grant of Easement

Grants PGE the right to “erect, operate, maintain, repair, rebuild” power lines and “to remove, top, limb, all alder, maple, fir and other large trees.”



## NRMP Page 217

Projects that disturb 10,000 sq. ft. or more of soil or vegetation are “exceptions” to the NRMP.



## Appendix I Blumenauer/Hales 10/23/2024 Letter

“The NRMP offers guidance for the City and utilities to collaborate on conservation goals ... not to prohibit any future development for this purpose.”

## In Lieu Fee Ordinance No. 191314 6/7/2023

Adopted specifically to improve mitigation of ongoing development and maintenance of existing utility corridors in the park.

# Meeting the approval criteria



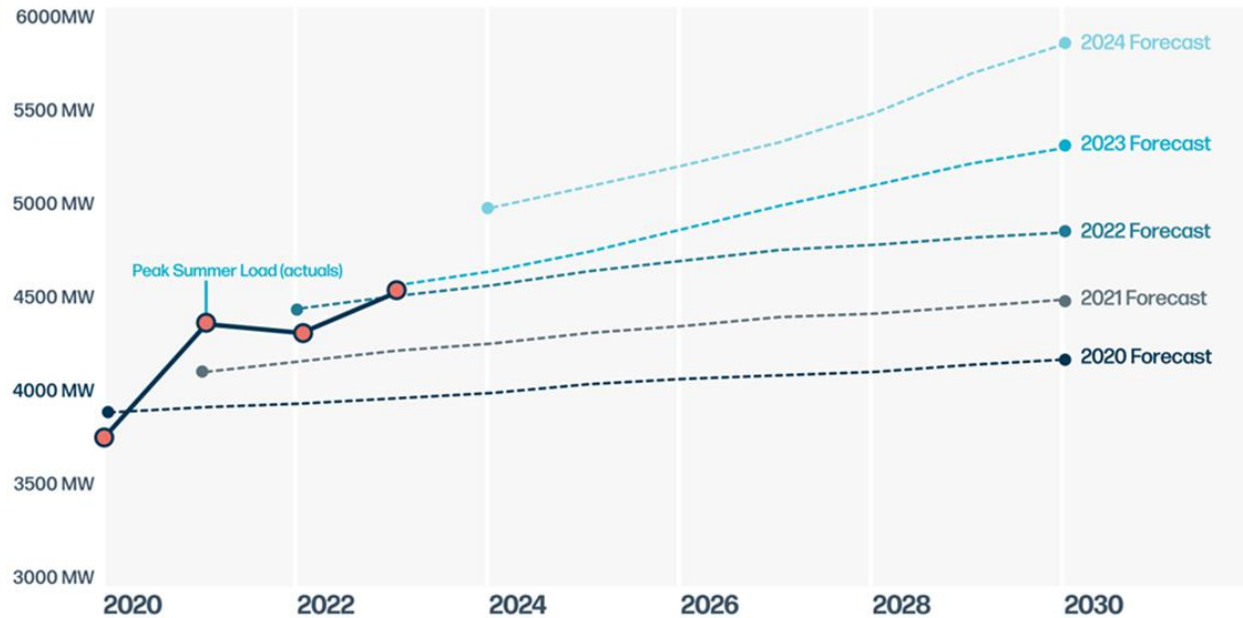


**Transmission capacity is needed nationwide, and in Portland**

# Portland needs infrastructure for reliable power in a changing environment

## Increases in recent summer load forecasts - 2020-2024

PGE Load Forecasting (1-in-20 summer projections)



# PGE is required to operate our grid reliably within foreseeable scenarios, including peak demand

1

Federal Energy  
Regulatory Commission  
(FERC) and its Office of  
Enforcement

2

North American  
Reliability Corporation  
(NERC)

3

Western Energy  
Coordinating Council  
(WECC), regional  
enforcement entity

**Exceeding reliability range limits will require reducing usage via outages**



# This phase stands alone

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**PHASE 1** Created a new substation; restored 74-acres of wetland and wildlife habitat by Willamette River

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**PHASE 2** Replacing, upgrading an existing transmission line from the Harborton Substation into industrial, urban Northwest Portland

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**PHASE 3** Fixes a bottleneck within existing ROW crucial for serving reliable power to North, Northwest Portland

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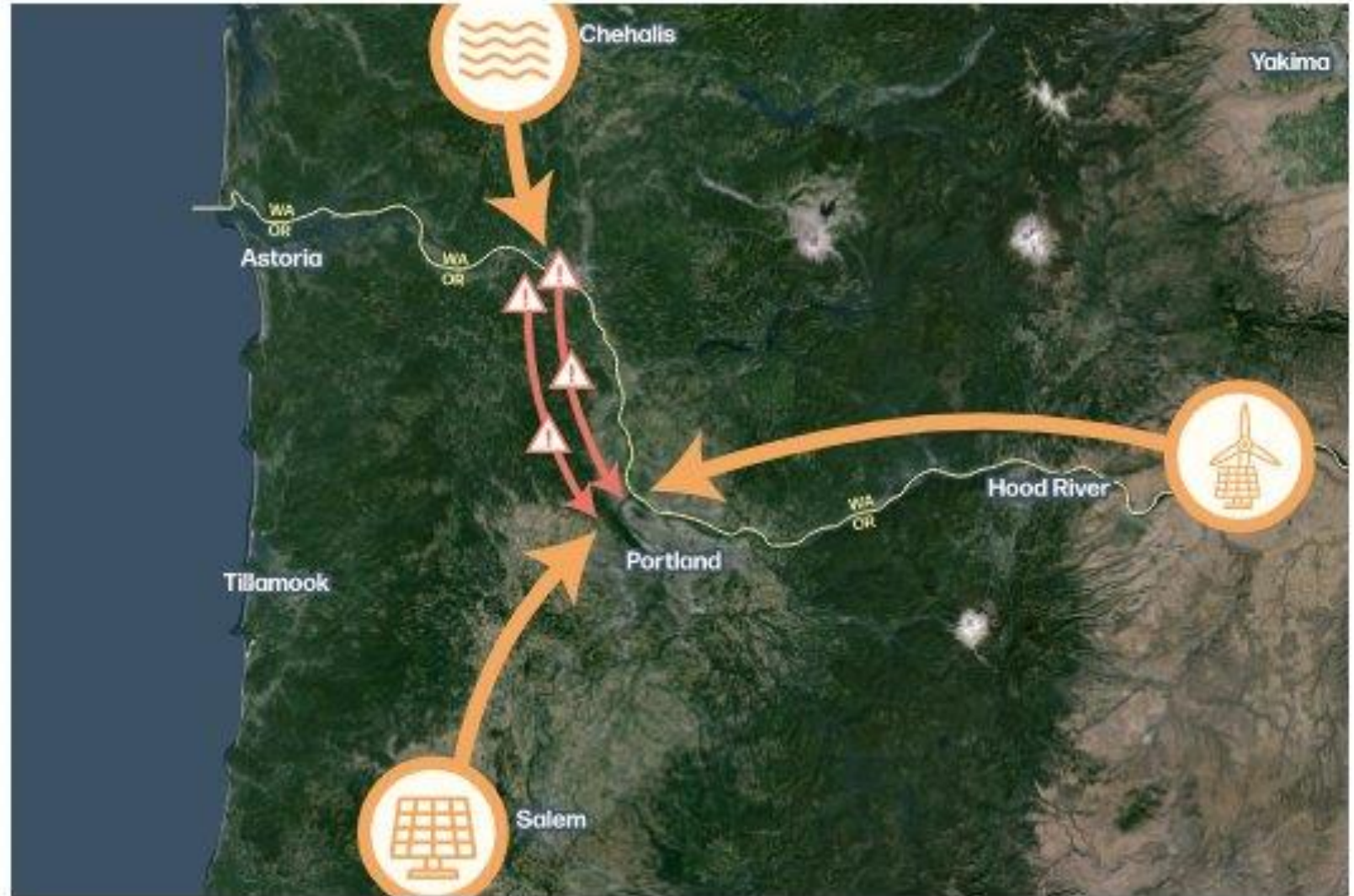


**This project has independent value. It does not make any future potential phase more likely or inevitable.**

# Customers are at risk



This location is a chokepoint in our grid



Harborton will add capacity, relieving the chokepoint to benefit Portland.



- Existing PGE Transmission Line
- Existing BPA Transmission Line
- - - Proposed New Transmission Line
- . - . Upgrade to Existing Transmission Line

**The only feasible project**

# We returned to the drawing board time and time again

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## 2022 - TOTH REPORT ANALYZED 8 ROUTES AROUND FOREST PARK

- NW Marina Way options identified as least impeded, but “severe impediment” render both infeasible
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## 2023 - PGE ATTEMPTED TO RESOLVE SEVERE IMPEDIMENTS

- Private property owner opposition
  - Foreshadowed lengthy regulatory, condemnation proceedings
- 

## 2024 - APRIL 2024 ALTERNATIVES ANALYSIS OF INCLUDING FLAWED ROUTES

- Independent transmission expert
  - Even the more costly options do not resolve the chokepoint
  - Concludes infeasible Marina Way routes are infeasible - they do not meet the project need
- 

**No other project is feasible**

# Avoiding, Minimizing, and Mitigating Impacts

# The affected resource

Natural Resource  
Inventory Site FP2





# Existing conditions



**Stream 1**



**Low-quality wetlands**

# Steps taken to minimize impact

- Reduced project footprint
- Evaluated 700+ trees using ISA criteria
- Selective removal only where necessary
- Top trees where possible
- Leave short trees, shrubs undisturbed
- Modified design to avoid oak and limit riparian impacts
- Limited work windows

# Compensatory mitigation in the utility ROW

- Double the local OR white oak
- Offset 0.12% loss of common forest type
- Expand biodiverse habitat for 200+ wildlife species
- Coexist with power pole heights
- Enhance riparian habitat
- Support pollinators with native seed mix
- Leave woody debris, habitat niches

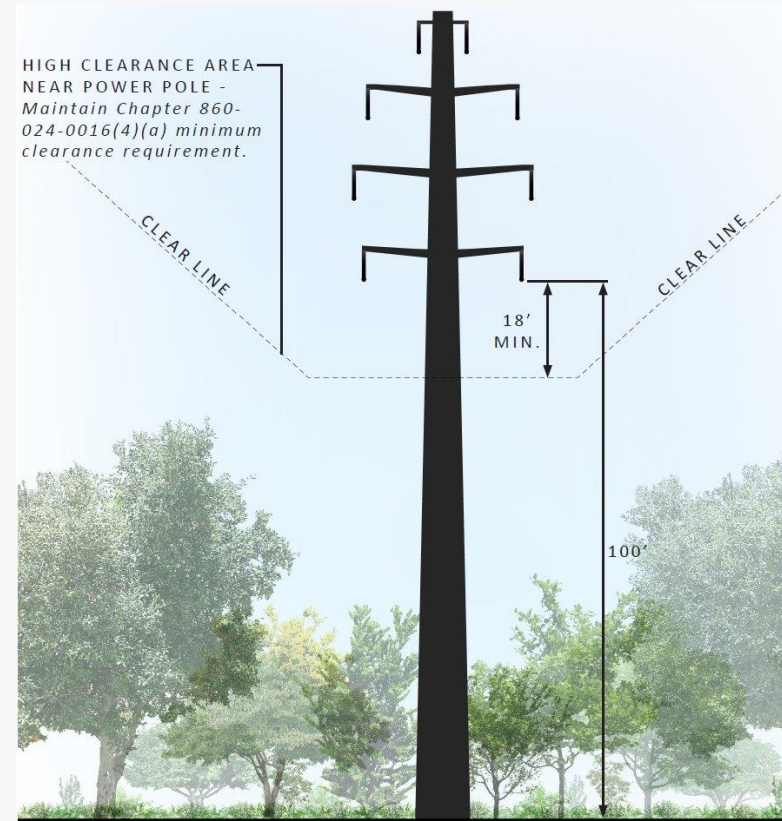


**Existing Oregon white oak stands**

# Utility easements conducive to oak woodland

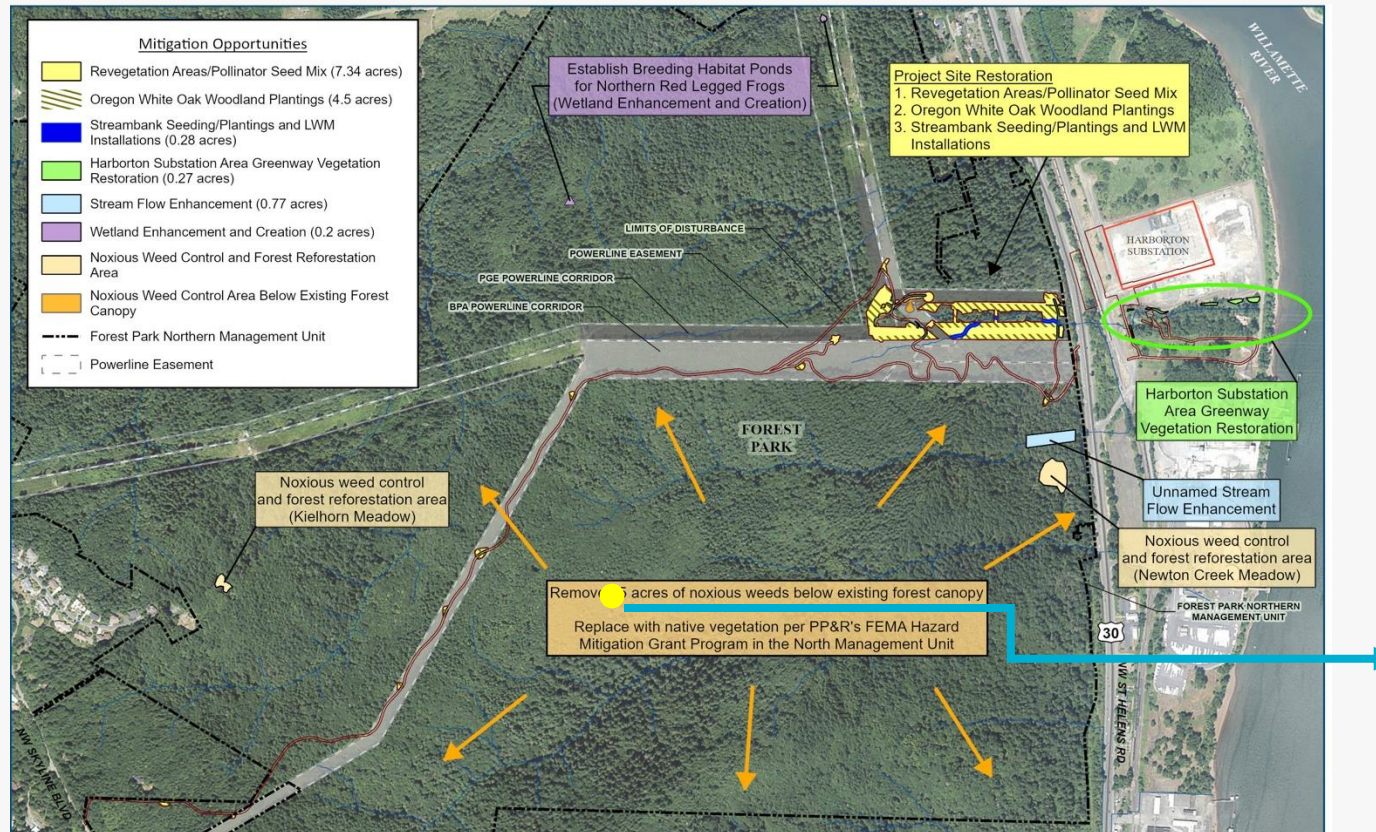


**Existing oak woodland patch  
below Douglas fir**

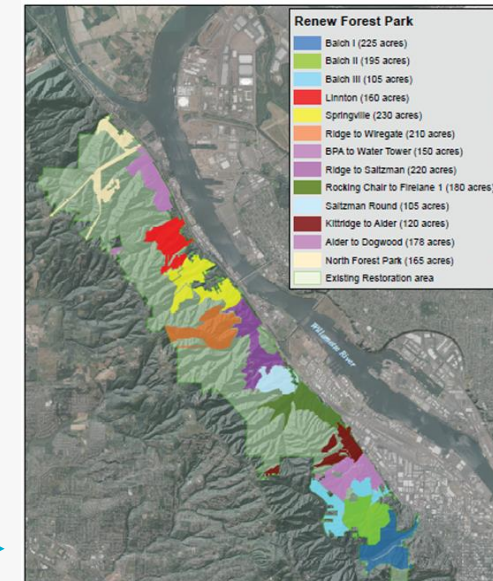


**Proposed plantings in  
utility corridor**

# Mitigation in the NMU – Address NRMP, City Goals



Mitigation opportunity areas



**Areas of Invasive Plants**  
 \*Source: PP&R Restore Forest Park Fact Sheet

# Mitigation Ratio Guidance

Mitigation Method	on-site base ratio ÷ 1.5	0-5 miles from WHI = no change to base ratio
Re-establishment	1.3:1	2:1
Rehabilitation	2.6:1	4:1
Enhancement	5.3:1	8:1
Preservation	10:1	15:1

**Excerpt of Table 3 from City of Portland West Hayden Island (WHI) Floodplain Forest Mitigation Framework. Summary of base ratios and modifiers.**

\*Source: WHI Framework Attachment C

# Addresses Forest Park, Regional Mgmt Plan goals



Proposed Mitigation	Mitigation Acres	Ratio ( credit: debit)	Resulting Mitigation Credit Acres	Remaining Mitigation Debit Acres
Remove noxious weeds in mature forest in NMU and plant native shrubs to allow forest regeneration and seral development (PP&R Lead)	25	8:1	3.13	1.56
Remove noxious weeds and re-establish trees/shrubs in Newton Creek Meadow and Keilhorn Meadow areas of NMU dominated by Himalayan blackberry and lacking a forest canopy (PP&R Lead)	0.75	5:1	0.15	1.41
Improve hydraulic processes through stream enhancement on unnamed creek crossing Newton Trail (PP&R Lead)	0.05	1:3	0.15	1.26
Construct northern red-legged frog breeding habitat ponds at Newberry Rd. to support local Forest Park population (PP&R Lead)	0.2	3:1	0.07	1.19
Establish short-stature forest habitat including large percentage of Oregon white oak; include several snags and large tree boles left on ground in fire-safe manner	4.72	3:1	1.56	-0.37
Establish native shrub habitat beneath wires; increase biodiversity	2.56	5:1	0.26	-0.63
Apply Native Pollinator Support Seed in disturbed areas	0.53	10:1	0.05	-0.68
<b>Permanent Impact Acres</b>	<b>Total Mitigation Acres</b>	<b>Average Mitigation Ratio (mitigation acres: impact acres)</b>		
4.68	34.69	<b>&gt;7:1</b>		

**PGE's proposal is consistent  
with the NRMP**



# Minor Amendment Criterion (B)

**The proposed plan is consistent with Forest Park NRMP Goals and Strategies.**

- There are 4 Goals and 10 Strategies in the NRMP
- Staff report says proposal not consistent with 2 Goals and 1 Strategy

# Minor Amendment Criterion (B)

## NRMP Conservation Goal 1

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.

- "Protect... while managing...in order to grow" to "benefit future generations"
- Longer-term benefits are numerous:
  - Climate resiliency
  - Increased biodiversity
  - Wildfire resistance
  - Emissions-free energy

# Minor Amendment Criterion (B)

## NRMP Conservation Goal 2

Design management and restoration efforts to: maintain and enhance regional biodiversity; provide wildlife habitat and migration opportunities; improve water quality and aquatic habitat; repair damaged and fragmented natural systems.

- Staff literally ignores the forest for the trees
- Uncontroverted evidence shows that in the long run:
  - Biodiversity is improved
  - Habitat is restored and migration opportunities enhanced
  - Rare and valuable oak woodland habitat is created
  - The forest is better

# Exception Criterion (E)

The proposal is consistent with the purpose of the Environmental Zones

## **PZC 33.430.010.**

- Environmental zones protect resources and functional values that have been identified by the City as providing benefits to the public.
- The environmental regulations encourage flexibility and innovation in site planning and provide for development that is carefully designed to be sensitive to the site's protected resources.
- These regulations also help meet other City goals, along with other regional, state, and federal goals and regulations.
- The environmental regulations also carry out Comprehensive Plan policies and objectives.

# Exception Criterion (E)

- “Protect resources and functional values”
  - Avoidance - minimization -- compensation
- “Encourage flexibility and innovation in site planning”
  - Extensive alternatives analysis
  - Changes to design during pre-application process
- “Provide for development... sensitive to the site’s protected resources”
  - Compatible development is permissible and even anticipated by the NRMP
- **“Help meet other City goals, along with other regional, state, and federal goals and regulations”**
  - Wildfire protection
  - Carbon free energy goals
  - Climate resiliency
  - Heat islands
  - Habitat diversity

# Reduction of Wildfire Risk

## NRMP Strategy 7: Improve Park Safety

- Blumenauer and Hales
  - When the NRMP was adopted, “the two most pressing issues were, and remain now, invasive species...and the risk of forest fires. Portland would be well served to consider any plan that brings new resources to the large-scale removal of ivy and ladder fuels throughout the park.”
  - “A reading of the NRMP that obstructs the needed provision of power in the utility easements and surrenders a partnership opportunity to make needed investments in forest health would be a deviation from our original intent.”
- Portland Fire Bureau submitted no concerns

## Consistent with the NMRP

**Takeaway:** For 50+ years the City has expressly acknowledged that utility corridors will be maintained and improved over time, not frozen forever in their current condition.

**Conclusion:** It is the Proposed Project that is consistent with the NRMP and City policy; freezing the park in time is inconsistent.

# Letters of Support

- Columbia Corridor Association
- Greater Portland Inc.
- Northwest Industrial Business Association
- Oregon Business for Climate
- Port of Portland
- Portland Metro Chamber
- Swan Island Business Association
- TriMet
- Working Waterfront Coalition

## Columbia Pacific Building Trades

- IBEW Local 48
- IBEW 125
- Ironworkers Local 29
- Operating Engineers Local 701
- Oregon and Southern Idaho District Council of Laborers
- United Union of Roofers, Waterproofers and Allied Workers
- Numerous individual union members





# Thank you

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