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From: Karen Antell <antell.karen@gmail.com>
Sent: Tuesday, January 10, 2023 3:11 PM
To: PUC PUC.PublicComments * PUC
Cc: PUC PUC.FilingCenter * PUC
Subject: PCN 5 Idaho Power application for Certificate of Public Convenience and Necessity - CPCN
Attachments: Protect This Place Oregons Twin Lake The Revelator.pages

To Whom It May Concern:

I am writing to object most strenuously to the issuance of a Certificate of Public Convenience and Necessity (CPCN) to Idaho Power for construction of the B2H powerline through the Morgan Lake corridor over Glass Hill in Union County instead of following the NEPA-preferred route. Such a concession would allow Idaho Power to seek condemnation of highly sensitive areas with important biological, cultural and overall environmental significance. This is simply unnecessary and not in compliance with the intent of the NEPA process.

The degradation of tower construction would irreparably, adversely impact the natural ecosystems of Ladd Marsh, Mill Creek, The Glass Hill Natural Area, Morgan Lake, and Twin Lake. It would degrade private landowner's investments, and the use and enjoyment of these areas for recreation and observance of nature by the entire broader communities of La Grande and Union County. The private landowners and City of La Grande (Morgan Lake Park) have been good stewards of this land, protecting its important ecological heritage for all of Union County residents. Most notably, Dr. Joel Rice has placed much of his property into the Oregon State Natural Areas program, in order to ensure that some of Oregon's most important and imperiled ecosystems on Glass Hill would be protected in perpetuity for the future of all Oregonians, not just those of Union County.

The NEPA proposed route would result in significantly less environmental impact to sensitive and irreplaceable natural areas, and with far less detrimental effects to visual impact and private land condemnation. Glass Hill landowners and many other individuals and groups with intimate knowledge of Glass Hill environments and ecosystems are shocked, saddened, and sickened by the dysfunction of the current process which has resulted in Idaho Power planning to construct the line along what is inarguably the *Most Environmentally Sensitive* area along the entire proposed B2H corridor in Union County.

The Morgan Lake route has not been adequately studied for impact to sensitive plants, wetlands, birds, other wildlife, and overall environmental degradation. Land owners and residents of Union County know the area well, and are shocked by the suggestion of constructing a power line through the Morgan Lake area. The underlying hydrology that keeps the Morgan Lake and Twin Lake wetlands intact is neither well-studied or understood. Disruption of the subterranean water flow to these critical wetlands by blasting and tower construction nearby could have catastrophic consequences for ecological function.

Granting the CPCN certificate would demonstrate that the transmission line is a public use and necessary for public convenience. Yet, while some may consider the transmission line necessary, the location of the line does *not* need to cross Glass Hill via the Morgan Lake corridor. It can be constructed in other places with less cost, and with significantly less environmental damage. The line can be constructed elsewhere, but the ecological values of the Morgan Lake corridor and ridgetop area that would be damaged cannot be replaced or reconstructed elsewhere.

Idaho Power needs to accept some measure of responsibility and behave in a way that ensures public accountability. If they chose not to do this willingly, then the public process and the Public Utilities Commission bear responsibility for ensuring that the best interests of the public are being met by projects such as this.

The NEPA process has already specified that the Morgan Lake corridor is *not* the least impact route for B2H construction over Glass Hill. I urge the Public Utilities Commission and/or any other party with authority, to deny a permit to Idaho Power for construction of the B2H line through this sensitive area. It's time to right a significant wrong and bring some public accountability to this long, drawn-out process of choosing the environmentally and socially responsible *best* route through Union County, not a route that was initiated and promulgated by wealthy landowners.

Attached is an article titled "Protect This Place: Oregon's Twin Lake", providing more details about my concerns about the important biological diversity in and around Morgan Lakes, which I authored, and is published on the website of the Center for Biological Diversity, TheRevelator.org, 9 January 2023. Please include this in the public record of my comments regarding the permitting process for the Boardman to Hemmingway Power Line project through Union County, Oregon.

In conclusion, I also support consideration of each of the following statements:

Alternatives such as the undergrounding of the B2H for 1.7 miles in front of the National Historic Oregon Trail Interpretive Center in Baker County must be considered to preserve this exceptional tourism and historical resource.

The federal **BLM-preferred route** several miles to the west of La Grande must be considered thus saving: Morgan Lake Park, Twin Lake wetlands, Glass-Rice Natural Area, and better protect numerous rural homes facing corona noise intrusions that are predicated to exceed the state's noise control standards.

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.**

An underground direct current (DC) line along the railroad right of way, or the interstate (with EV charging stations) would be more secure and more innovative.

Upgrading and fire hardening the existing 3 lines between Oregon and Idaho (Path 14) should occur before building anything new and taking people's land.

Decentralized energy generation and resources in Idaho (or close to customers) are trending, growing, and must be considered again. Too much has changed since the old Idaho Power energy plans (IRPs) were acknowledged.

Sincerely,
Dr. Karen Antell
Professor of Biology, Eastern Oregon University, retired
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Protect This Place: Oregon's Twin Lake

A proposed high-voltage power line threatens a mountain lake and its surrounding wetlands.

Voices

January 9, 2023 - by Karen Antell

The
Revelator

Wild, Incisive, Fearless.

<https://therevelator.org/protect-twin-lake/>

The Place:

Atop a ridge in the Blue Mountains, just west of the small town of La Grande in northeast Oregon, hides a beautiful small lake and associated wetland. What we now call Twin Lake or Little Morgan Lake — its Indigenous name is unknown to me — offers the promise of secluded summer breeding habitat for aquatic species, as well as food and respite for many birds following ancient migration routes. Clean, perennial water supports a complex community of aquatic plants, invertebrates and amphibians.

Why it matters:

Twin Lake hides behind its larger sister, Morgan Lake, on Glass Hill. Construction of a small dam in the early 1900s increased the size and depth of Morgan Lake, creating a reservoir for irrigation and, soon thereafter, electrical power. Water released from the dam tumbled down 1,000 feet, passing through turbines to generate electricity for the growing town below. Twin Lake, however, escaped development and remains a place of peaceful natural beauty.

PROTECT THIS PLACE



By the 1960s local power no longer depended on the dam, and Morgan Lake reservoir appeared to be doomed to become an exclusive, gated development of waterfront homes. Against long odds, a dedicated group of local conservationists affiliated with the Isaak Walton League helped to forestall this plan. The lakes and remaining wetlands were deeded to the city of La Grande in 1967, providing some measure of protection for native vegetation, wildlife, and recreation.

Today the city of La Grande owns and manages the property as Morgan Lake Park. Stocked with fish each summer, Morgan Lake attracts boaters, fishers and picnickers. Twin Lake, though part of the park, has largely escaped public attention. Somewhat hidden to the west, it remains in near pristine condition, where it provides refuge for an extraordinary diversity of emergent aquatic plants, invertebrates, reptiles, amphibians, and countless seasonal nesting birds and annual migrants.

These ridgetop wetlands harbor secrets of some ancient geologic magic. No inlet stream enters either lake, yet both Twin and Morgan lakes remain wet year-round. Subterranean springs pump water upward from an active aquifer hidden somewhere below. Snowmelt also contributes moisture to the system.

Twin Lake comprises a broad, shallow pond filled with emergent plants that exhibit surprising botanical diversity. A lush growth of native great yellow pond-lilies (*Nuphar polysepala*) thrust their large flowers up through dense mats of floating leaves. Common bladderwort (*Utricularia vulgaris*) catches and digests tiny insects and crustaceans in trapdoor bladders hidden among their leaves submerged beneath the water. An unusual plant known as bogbean (*Menyanthes trifoliata*), found nowhere else along Glass Hill, flourishes in Twin Lake.

The threat:

Idaho Power Company has applied for a permit to construct a 500-kilovolt power line that would run through the property directly adjacent to Twin and Morgan

Lakes. Following official condemnation of the surrounding private lands, deep blasting will commence in order to set the footings prior to construction of immense towers. In addition to a higher wildfire threat from the high-voltage lines, construction and operation of the power line will introduce invasive plant species and possibly alter the area's hydrology irreparably.

The underlying geology of Glass Hill is complicated and not well understood. No one knows exactly how the flow of subterranean water to Twin and Morgan Lakes might be altered by tower construction. Without life-sustaining spring water, Twin Lake may dry up quickly, leaving behind only a dry, fire- and weed-prone field of little ecological value.

My place in this place:

The origin story of Glass Hill includes explosive volcanic eruptions, lava flows from ancient fissures in the underlying rock, and faults thrusting layers of basalt upward in seismic events buried in long, geologic time. Next, layers of fine volcanic ash spewing from the great eruptions of Mt. Mazama 7,700 years ago added layers of fertile soil throughout the forests of northeast Oregon. Indigenous people walked this ridge for many thousands of years, creating their stories and life histories in harmony with the land. People from the Cayuse, Umatilla, Walla Walla and Nez Perce Tribes arrived to harvest abundant camas bulbs and fish in the Grande Ronde Valley below.

Eventually wagon trains following the Oregon Trail westward from Missouri brought many new people to this place, including some of my own ancestors. Changes to the landscape were profound, as farming, mining and railroads replaced sustainable hunting and gathering. As a botanist, I grieve the many losses and acknowledge that what remains is precious.



Plants emerge from Twin Lake. Photo: Karen Antell

Innumerable stories could be told about the complex web of interactions of any native ecosystem. These stories inform the collective wisdom and experiences of the communities they embrace. Our lives, like those of Indigenous people before us, become impoverished when these connections disappear from living memory. I feel protective of this place and have sought to keep knowledge of the natural ecosystems alive through public education. The unique wetlands springing to life along this obscure ridge top might continue to fill us with wonder and inspiration for many more generations, if we can only keep it whole.

Who's protecting it now:

Twin Lake has no official protection beyond its inclusion within Morgan Lake Park. A grassroots organization, the [Stop B2H Coalition](#), has formed in opposition to the transmission line, which will run 305 miles and require 1,200 towers.

What this place needs:

Strong environmental protection ultimately requires time, money, political savvy, and sustained community involvement. The economic forces driving big energy projects like this one quickly overwhelm small communities. Twin Lake needs the legal protections that a strong conservation easement might provide. Legal documents require attorneys. Attorneys require fees. Fundraising requires dedicated volunteers, donors, and an engaged community.

Lessons from the fight:

We must practice constant vigilance. Concerned residents and the Isaak Walton League helped save this area once before from commercial development. We became complacent, assuming that this special, peaceful place would always be here for morning birdwatching, afternoon walks, and summer star-gazing. No one ever imagined that the day would come in which the very existence of this important wetland would be threatened by construction of high-voltage electrical power lines. Special places require special protections, and once the threat appears, it may be too late.