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Administrative Hearings Division
Public Utility Commission of Oregon
PO Box 1088
Salem, Oregon 97308-1088

Via Email: PUC.PublicComments@puc.oregon.gov
Attn: LC#78

Dear OPUC Commissioners,

Re: Comments on Idaho Power's 2021 Energy Plan

I am an ecosystem scientist with expertise in ecology, forestry, climate science, and global change biology. I currently live in Enterprise, Oregon and have also lived in La Grande while my wife attended Eastern Oregon University. I work for Eastern Oregon Legacy Lands, sponsor of Wallowology Natural History Discovery Center located in downtown Joseph, Oregon.

I am strongly opposed to the Boardman to Hemingway Transmission Line. We are facing urgent climate and biodiversity crisis, and the Blue Mountains region offers major natural solutions to this problem. It is crucial that we protect intact watersheds and forests from fragmentation and increasing wildfire threats, and safeguard wildlife corridors. The B2H would clearcut a huge strip across the heart of our forested region and replace these natural systems with degraded lands and vulnerable infrastructure. The project is too destructive for the fragile eastern Oregon environment and habitats.

Environmental Destruction

The towers would each require a massive underground disturbance with tons of concrete poured into the footings to support the towers. The soil and hydrology will be substantially impacted by this permanent disturbance and underground barriers to subsurface hydrology. The loss of canopy cover in this massive clearcut will expose the soil to direct solar radiation, greatly elevating summer surface temperature and drying out soils and surface water. The clear-cut area will be a haven for invasive weeds and I expect would require perpetual maintenance including chemical treatments. And the towers create a monstrous imposition on our landscape, desecrating viewsheds and degrading the character that attracted people to live in these areas in the first place. This project causes long-term degradation to the ecosystems of the Blue Mountains. This is not what we want for our home, communities and landscape.

Wildfire

The B2H puts dry fire-prone forests, and nearby communities at greater risk of wildfires ignited by the transmission lines. Transmission lines have been implicated in ignition of major wildfires that have had tragic consequences for human communities and natural ecosystems in the western US.

In recent years we've seen power lines start major fires in California with disastrous consequences. Keeping infrastructure out of harm's way by not building in fire-prone forests is the best option.

Wildlife Corridors

The Blue Mountains represent one of the most biologically important wildlife mega-corridors in the Pacific Northwest, directly adjoining the Northern Rockies to the East, and the Cascades to the West. The data in Figure 1 illustrates the average direction mammals, birds and amphibians need to move to track hospitable climates as they shift across the landscape. The East-West orientation of this corridor is unique, forming a linkage between systems that are otherwise characterized by North-South migration corridors. The integrity of the Blue Mountains corridor is critical to the survival of the species that inhabit Eastern Oregon, and for resilience of adjacent regions in the Cascade Mountains and Rocky Mountains. Climate change increases the need for species to move and adapt to change, and the B2H Transmission line puts a massive barrier to movement on the landscape. The B2H Transmission line will significantly degrade the natural ecosystems of the Blue Mountains and threatens the integrity and well-being of the ecosystems and communities of Eastern Oregon.

Blue Mountains: Mega-Wildlife Corridor

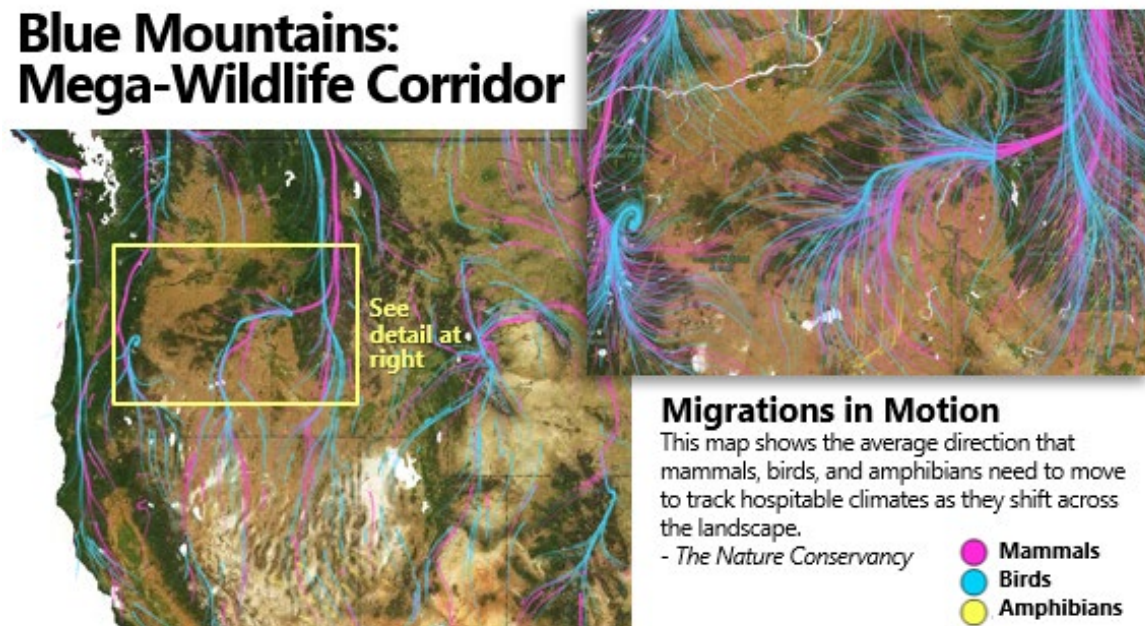


Figure 1. The average direction mammals, birds and amphibians need to move to track hospitable climates as they shift across the landscape of the interior PNW region of Oregon, Washington and Idaho. <http://maps.tnc.org/migrations-in-motion/#7/44.739/-119.680>

Private Property and Cultural Values

Over 75% of the proposed line is on private lands that would be subject to eminent domain. Property values will be reduced and homeowners/landowners will have a direct and permanent economic loss. Farms and ranches will be impacted by weeds and interrupted groundwater flow due to the massive ground disturbance as well as other infrastructure obstructions, creating operational disruptions and loss of income. The Oregon Trail, our shared cultural legacy will be traversed at least eight times with great risk of destruction; once destroyed it can never be brought back. The negative impacts of this transmission lines on our region's rich land-based cultural traditions and unnecessary and long-term lasting.

In conclusion I am strongly opposed to the B2H Transmission line due to its negative impacts on habitat connectivity, wildfire risk, working lands and families, scenic resources, and the economic vitality of our region. The B2H Transmission Line would slice a major barrier to wildlife movement directly through the heart of this landscape. Such actions run counter to biodiversity conservation, water protection, climate change adaptation and ultimately to the health of the communities of Eastern Oregon.

While this project is sold as energy security for our region, the project degrades the very ecosystems that support the communities and livelihoods of Eastern Oregonians. We could avoid these bad tradeoffs by upgrading and fire hardening the existing transmission lines. Working in the existing footprint is by far the most efficient way to go

Respectfully submitted,

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