

**From:** [Eloise Erickson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park from Clearcutting  
**Date:** Saturday, November 16, 2024 10:18:52 PM

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Morgan and Christine,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

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**Eloise Erickson**  
[they/them/theirs](#)

**From:** [Brett Warnock](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Saturday, November 16, 2024 10:23:27 PM

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Hi Morgan and Christine!

Lifelong Portlander, Brett Warnock writing with a HUGE ask. Please don't allow PGE to clear cut parts of Forest Park. In total, the proposal includes the removal of 376 living trees, and 21 dead trees. It will permanently fill at least two wetlands and disrupts two streams that support multiple species of aquatic wildlife.

So much about this proposal is questionable, and i'm certain you've heard from more eloquent people than myself. At the end of the day, this becomes a choice between the people (actual human beings) and a healthy ecosystem, or kowtowing to to monied corporate interests.

I love this beautiful city. I was born here, and i'd like to live and die here. But decisions that benefit bazillionaires over the very people who call this home, well, that just doesn't sit well with me.

I really really really really really hope the proposal is rejected.

That is all. Thank you for listening.

Brett Warnock  
Portland



**From:** [Henning Holz](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project Comment  
**Date:** Sunday, November 17, 2024 7:41:07 AM

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I'm writing to tell you to deny any land use permits sought by Portland General Electric (PGE) for any powerline expansions. The city already knows the environmental harm it would have on Forest Park and the ecosystems surrounding the forest; on the bird and frog populations (as well as other wildlife) and human alike. I am one of those people that frequents Forest Park for my health and well being. This would have negative impacts on the public as a whole. As climate change brings more harmful weather events to every region, we should be prioritizing our environment and building ecosystems that can flourish with biodiversity.

This project would clear cut at least 5 acres of forest! This would directly harm the Red-Legged frog population in the area.

Additionally, this project is not even for Portland, it is for Hillsboro tech facilities, like Intel. A large corporation that values money more than life, as we've seen when they aid Israel in their last year of war and genocide.

I am **strongly opposed** to this project due to its ecological and economic impacts on myself and other Portland residents (both human and frogs). Please refuse PGE's use permit!!

Thank you,  
Henning Holz

**From:** [Chennin](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comment pge/forest park  
**Date:** Sunday, November 17, 2024 9:06:22 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the

"Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Chennin

**From:** [Katie Pattison](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public Comment on PGE Forest Park Clear Cut  
**Date:** Sunday, November 17, 2024 9:09:24 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit. Thank you for your consideration.

Katie Pattison  
Portland Resident & Business Owner

**From:** [sundelende](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment - Harborton  
**Date:** Sunday, November 17, 2024 10:20:38 AM

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Morgan and Christine,

I am writing to express my opposition to the land use permit sought by PGE for the "Harborton Reliability Project." As the City has noted, the project would severely impact Forest Park's management goals, as well as causing irreparable damage to the surrounding ecosystem, including all of the wildlife, soils, brush, and human beings who enjoy and care for the area. While the project claims to provide economic benefit and resources for large corporations, to prioritize this would be a glaring oversight of the other ecosystem services this land provides. Examples of land management and value quantification can be found in projects from the USDA FS Collaborative Forest Landscape Restoration Program and DIVE Urban Heritage Analysis. It is also a shameful inheritance to leave for future generations, foisting responsibility for the healthy restoration of this land to a yet later date, knowing what we do about the importance of maintaining ecologically resilient ecosystems in the face of the climate tipping point we have reached.

Clearcutting is a practice that is extensively acknowledged as a violation of every principle of sustainability in any culture, particularly those with historic ties to this land, from Western biological sciences to Indigenous knowledge and values. Clearcutting is a grave mistake from which many ecosystems cannot recover without extensive human intervention, because of the way it immediately removes not only necessary habitat for wildlife and young trees, but also because of the removal of nutrients and microbial networks from the soil, making it exponentially more difficult for future life to establish there again. This coupled with the land disturbance brought by heavy industrial construction will inevitably trample precious land which we will not see approach their current, much less pre-colonial, health for generations to come. I am shocked that a city I chose to live in because of the value we purport to share for our natural landscape and sustainability would even consider such a destructive, short-sighted project.

I also understand that this project is intended to provide electricity to a number of large companies headquartered in Hillsboro, rather than being a project that will help Portland residents or others who have ties to Forest Park. The claims that this electrical pathway will support climate-smart electrification in Hillsboro, this is clearly intended only to benefit these companies, providing them with climate related tax breaks at best and being completely fabricated at worst. In the face of what the actual ecological impact of the work the tech sector does, it would be negligible countermeasure to support their electrification. I am also curious about how the electricity itself would be generated, considering the intensity with which Zenith Energy continues to seek permits to bring oil and coal terminals to our waters. It would also simultaneously do the aforementioned far-reaching damage to Forest Park, Portland, and our surrounding ecosystems.

I don't pretend to be an expert on forest management, electricity use, or economic development. But I think perhaps that is a boon to my capacity to care for the future, because I am not interested in chasing money now when it will dry up and create more problems in the decades to come. I hope that the people who are considering this project can step away from the immediate benefits and look at it on a scale of more than ten years, more than a century, all the way out to seven generations in the future. Are you leaving homes, a strong ecosystem which can provide food and water, and a faith and love for the survival skills you pass on to our grandchildren? Are you honoring the way that such rich, full, safe human lives were able to exist on this land for sixteen thousand years before anyone dreamed of electrical lines? I urge you to deny this permit and re-examine the strategies you prioritize when you plan for our collective future.

Sincerely,  
Jamie Weins  
Portland (97212)

**From:** [Ian Taylor](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment on PGE's Forest Park Clear cut  
**Date:** Sunday, November 17, 2024 10:21:16 AM

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To whom it may concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric for the "Harborton Reliability Project" powerline expansion. As the city previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, damaging critical wildlife populations, and impacting recreational areas popular to Portland residents. Forest Park is one of the jewels of our city, and allowing its destruction in part is a dangerous and slippery slope. (Both figuratively and literally, as the trees protect us from landslides).

The clearcutting would require the clear cutting of at least five acres of forest along the powerline corridor, including an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro , including facilities like the Intel expansion project. While the utility company claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear that the vast majority of increased demand is coming from these tech facilities. Please ask PGE to explain how demolishing critical wildlife habitat, and releasing the carbon stored in our precious Forest Park trees is "climate smart".

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.**

Thank you for taking the time to read and consider my comment, and for the hard work you continue to do for Portland.

Sincerely,  
Ian Taylor  
NE Portland Resident

**From:** [Khalia Chambers](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Sunday, November 17, 2024 10:21:44 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

**From:** [Tama Hamamoto](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Sunday, November 17, 2024 10:36:55 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming birds, and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

In community, Tama Hamamoto

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**Tama Hamamoto**  
they/them



**From:** [N](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public Comment on PGE Permit  
**Date:** Sunday, November 17, 2024 11:07:31 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [William Cole](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest park comments  
**Date:** Sunday, November 17, 2024 1:00:41 PM

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Hi both, hopefully these comments are hitting the right people.

I'm writing today to condemn PGE's proposed power expansion that razes 5+ acres in Forest Park. Forest Park is one of the crown jewels of Portland and disturbing the forest and it's wildlife with permanent power infrastructure is short-sighted and tragic.

Furthermore, I'm not convinced that the plan would benefit Portland residents and rather would benefit corporations first, followed distantly by residents not within Portland city limits. Ultimately, the residents and environment of Portland would suffer.

In closing, I'm strongly opposed to this proposed development. Thank you for reading.

~Bill Cole

**From:** [Sarah Schmeer](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE's Forest Park Clearcut  
**Date:** Sunday, November 17, 2024 2:42:34 PM

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I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely, Sarah Schmeer

**From:** [Natalie Nixon](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please deny land use permit for PGE Harborton Reliability Project  
**Date:** Sunday, November 17, 2024 4:46:42 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland Residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor including in an area that provides crucial habitat for the imperiled Norther Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro, including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

Forest Park is one of our cities' greatest assets and draws. It is a beautiful place that deserves to be protected, taken care of, and preserved.

Given the threats to natural spaces that will undoubtedly be enacted with the incoming administration following our countries election results I believe it is more imperative than ever that we preserve our cities' natural spaces on a local level. Allowing PGE to move forward with the powerline expansion project in the park is not necessary, will not benefit the park or Portlanders, and should not take precedence over the needs of the park (including it's valuable wetlands and wildlife) and the people who use it daily and weekly.

Please see this webpage for a fuller illustration of the concerns around this project: <https://forestparkconservancy.org/pges-harborton-reliability-project-would-result-in-an-irreplaceable-loss-for-the-people-of-the-region/>

I am strongly opposed to this project due to it's ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Best,  
Natalie Athay  
Portland Resident

**From:** [Kadence Tanner](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Please don't clear out forest park!  
**Date:** Sunday, November 17, 2024 5:15:02 PM

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whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [stcantor](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** re land use permit being sought by PGE  
**Date:** Sunday, November 17, 2024 5:32:54 PM  
**Attachments:** [6206C2FF-1134-4AC4-B24C-212B60A1323D.png](#)

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I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Steven Cantor  
[stcantor@gmail.com](mailto:stcantor@gmail.com)

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the wild geese do not intend to cast their shadow  
the water has no mind to receive their image

**From:** [Jenna Manus](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Think of the Animals  
**Date:** Sunday, November 17, 2024 6:55:41 PM

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Hello Morgan,

I am writing to express my concern and opposition of PGE's recently resubmitted permit request to clear cut 5 acres of forest Park which Will not only kill dozens of old growth trees, but also disrupt the habitat of numerous species, we all know this is just the beginning of their clearcut requests. I urge you to side with nature and the citizens of Portland to protect this beautiful park for all people to enjoy and reject the permit application.

Thank you,  
Jenna



**From:** [Anna Brown](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Comment on PGE Harborton Reliability Project  
**Date:** Sunday, November 17, 2024 8:40:31 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Anna Brown  
they/them

**From:** [Panda Bear](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** save forest park!  
**Date:** Monday, November 18, 2024 12:00:02 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project"

powerline expansion. As the City

previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit. Thank you for your consideration.

elizabeth bressler

Sent from my iPhone

**From:** [Caruso, Christine](#)  
**To:** [Steele, Morgan](#)  
**Subject:** FW: Northern Red Legged Frog Habitat Destruction  
**Date:** Monday, November 18, 2024 6:52:45 AM

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**From:** Eliot Kurfman <ekurfman@gmail.com>  
**Sent:** Saturday, November 16, 2024 12:41 PM  
**To:** Caruso, Christine <Christine.Caruso@portlandoregon.gov>  
**Subject:** Northern Red Legged Frog Habitat Destruction

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Caruso, Christine](#)  
**To:** [Steele, Morgan](#)  
**Subject:** FW: Forest park  
**Date:** Monday, November 18, 2024 6:53:34 AM

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**From:** Linnea Stahura <stahuralinnea@gmail.com>  
**Sent:** Saturday, November 16, 2024 8:43 AM  
**To:** Caruso, Christine <Christine.Caruso@portlandoregon.gov>; mirgan.steele@portlandoregon.gov  
**Subject:** Forest park

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

Linnea Cat Stahura

**From:** [Daniel Pepper](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Think of the generations to come  
**Date:** Monday, November 18, 2024 7:24:31 AM

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Where do you draw the line? Don't be a class traitor. Don't lick the boots of big tech. Don't put profits over the desire of the people and the life of the living beings of forest park.

Imagine your name in a history book

Be a hero, not a cuck

November 18, 2024

Ms. Christine Caruso  
Ms. Morgan Steele  
Portland Permitting and Development  
1900 SW Fourth Avenue  
Portland, OR 97201  
(transmitted via email)

Re: Case File LU 24-041109 CU EN GW  
PGE Harborton Proposal

Dear Ms. Steele and Ms. Caruso:

I am writing on behalf of the Coalition to Protect Forest Park. The Coalition's purpose is to protect the jewel that is Forest Park and to ensure that all requirements of the Forest Park Natural Resources Management Plan are met. We thank you for the opportunity to submit initial comments on PGE's revised application to build high-voltage power transmission lines through the North Unit of the Park.

We believe that PGE's application should be denied by the City for any of a number of reasons. Most importantly, the Application is contrary to basic three principles expressed throughout the Management Plan: (1) Damage to the Park should be avoided if at all possible; (2) If not completely avoidable, damage to the park must be minimized; and (3) If not avoidable and not subject to minimization, damage to the park must be mitigated within the same management unit of the Park. PGE's Application fails not just one but all three of these requirements.

### **THERE ARE NON-PARK ALTERNATIVES FOR PGE's PROJECT**

The first insurmountable difficulty with PGE's proposal is that under the Management Plan, "the health of natural resources [must be] the top priority for Park managers." Plan, at iii. The goals of Park management must be related to conservation, recreation, and education. Plan, at iii. Other uses of the Park are treated as "exceptions" that are required to meet specific requirements. Plan, at 217.

"Exceptions" must meet five separate criteria. Critically, the second of the required criteria sets as a prerequisite for approval that a proposal for development must be "a park-related development, or no alternative locations exist outside of Forest Park for the Proposal." Plan, at 217. PGE's application clearly fails this test.

More than two years ago, PGE commissioned and received a report from Toth & Associates, consulting engineers, who evaluated alternatives to PGE's proposed Forest Park route. For reasons that are unclear, PGE apparently failed to publicly disclose the Toth Report until

the submission of its revised application in October 2024, and certainly did not disclose it in the few public meetings PGE held between May and October 2024.

The Toth Report identifies at least two potentially viable alternative routes – labeled by the Report as Alternatives 4 and 8 – for PGE’s powerlines that would not traverse Forest Park. PGE does not dispute that the routes are potentially viable, and in fact appears not to have thoroughly explored the recommendations made by the Toth Report. Instead, it argues that the alternatives are more expensive than using Forest Park for its powerlines.

However, the Management Plan does not qualify the “no alternative locations” criterion for Exceptions. The Plan does not read “no alternative non-Park locations that are less expensive” than using the Park; it clearly states “no alternative locations,” without qualification.

PGE’s “too expensive” argument also fails for a factual reason. PGE has segmented in Harborton Project into five phases, Phase 3 of which is covered by PGE’s revised application. However, PGE’s evaluation of its costs for Phase 3 fails to take into account the costs (and potentially greater environmental impact) of Phases 4 and 5, which would also be sited in Forest Park. The Coalition believes that it is at least a reasonable possibility, if not a certainty, that when the costs of Phases 4 and 5 are taken into consideration, PGE’s plan to use Forest Park for the entire development would be less than the costs of Alternatives 4 and 8 outlined by the Toth Report.

PGE’s “too expensive” argument also raises troubling questions. What are the metrics for judging when a non-Park development is “too expensive?” Would a 10% additional cost be too expensive, or 25% or 50%? Would PGE propose that any non-Park related development such as its powerlines be eligible for siting in the Park if a non-Park alternative would be more expensive?

For example, would PGE’s argument allow for a paved four-lane road over the spine of the Tualatin Mountains and through the Park on the grounds that it would be more expensive to site the road elsewhere? Where PGE’s criteria for considering alternatives uses absolute phrasing with respect to costs (PGE’s Criterion 3 states that “Project must minimize cost impact to PGE ratepayers”) it uses only relative terms where the environment is concerned (Criterion 7 states that “Project must minimize the environmental impact to the extent practicable”). Application, at 14-15 (emphasis added). PGE suggests no answer to the question of what “practicable” means when balancing environmental damage against PGE’s costs.

Beyond the issue of costs, there is more that is problematic about PGE’s analysis of alternatives to the Forest Park route. To begin with, PGE’s Application analyzes only four alternatives, finding none of them acceptable. Application, at 19. The Toth Report, on the

other hand, analyzed eight alternatives, finding two of them potentially acceptable. PGE's application makes no attempt to dispute the Toth Report's recommendations and in fact only mentions the Toth Report once.

Moreover, the only potential "severe impediment" identified by the Toth Report for Alternatives 4 and 8 would be the need for PGE to re-site its existing Harborton-St. Helens 115 kV lines. In other words, mitigation of the impediment would entirely be in PGE's control.

In addition, there is no indication that PGE has explored co-locating of its existing 115 kV and proposed 230 kV lines on the same towers or in the same utility corridor, something that is technically viable. The Toth Report notes the possibility of co-location but states that an analysis of co-location "is beyond the scope of this study." Toth Report, at 22. In other words, PGE either told Toth & Associates not to evaluate co-location or failed to ask Toth & Associates to examine the possibility of co-location. PGE cannot hamstring an analysis of alternatives and then claim that there are no alternatives.

One additional word about PGE's unusual treatment of the Toth Report is in order. One of PGE's basic arguments is that it is running out of time to meet its power needs. However, PGE has had the Toth Report for at least two years, with full opportunity to evaluate the alternatives identified by the Report. Yet PGE appears to have ignored potentially viable alternatives. Under these circumstances, PGE should not be heard to claim urgency when it is the one that has failed to act on the Toth Report in a timely fashion.

Also, attendees at PGE's public meetings clearly recall PGE describing what were then called the Marina Way alternatives (identified in the later-released Toth Report as Alternatives 4 and 8) as requiring the condemnation of at least one building. This position continues in the Application, which states that the Marina Way alternatives would "likely require PGE to condemn property." Application, at 16. However, the Toth Report explicitly concludes that condemnation would not be required and that the routing of Alternatives 4 and 8 could avoid the building. Once again, the Application fails to dispute this conclusion in the Toth Report.

Most importantly, it is clear there are alternatives, viable alternatives that PGE's own consultant has identified, to PGE's proposal to use the Park for high-voltage powerlines. PGE should be required to explore and use those alternatives. That is what the Management Plan requires.

### **PGE'S PROPOSED MITIGATION PLAN VIOLATES THE MANAGEMENT PLAN**

Even if PGE could establish that there are no alternative locations outside of the Park for the 230 kV powerlines, it would still have to meet the remaining criteria in the Management



Plan for Exceptions. Criterion “D” in the Management Plan requires that “Any long-term adverse impacts of the proposed action on resource values are fully mitigated within the Management Unit.”

The Coalition does not believe that it is possible to fully mitigate the adverse impacts of PGE’s proposal. PGE’s core mitigation plan is to replace the conifers and broadleaf deciduous trees it wishes to clearcut, many of which are at least 100 years old, with Oregon white oaks. PGE does apparently realize the serious carbon sequestration impact of cutting mature conifers and broadleaf deciduous trees and proposes offsetting that impact by offering to plant trees outside of the Park in areas that have been identified as heat islands. Along the same lines, PGE indicates that it has identified a variety of other potential habitat restoration projects “that may occur both within and beyond the North Management Unit in Forest Park.” PGE Proposal, at 35.

But that is not how the Management Plan works. Under the Plan, long-term impacts such as those associated with clearcutting **must** be “fully mitigated within the Management Unit.” Plan, at 217.

There are numerous other problems with PGE’s mitigation proposal. PGE’s proposal does not appropriately take into account the damage that the clearcut will do to stream, wetland and riparian resources, damage that will impact a wide variety of birds, small and large mammals and amphibians and understory plants. Nor does PGE account for the soil compaction and soil loss that would occur as part of that clearcutting process.

The oak woodland PGE envisions would take at least 75 years to mature, during which the land would be prone to invasive species and the sort of noxious weeds PGE acknowledges pose a fire hazard. Application, at 33. The Coalition believes that young Oregon white oaks that did not grow on the steep hillsides targeted by the Application would be far less drought and fire resistant than the existing mature conifers.

PGE’s proposal also does not adequately account for the damage that will be done to the areas adjacent to its clearcut. Some of those problems were well described in the Management Plan, which stated: “Problems arise when cuts over large areas deplete adjacent habitat by creation of greater lengths of edge as well as ‘punching holes’ in contiguous forest in the relatively narrow peninsula that connects Forest Park to larger forests to the west. This leaves wildlife with fewer options for dispersal, fewer chances for contact with other populations and decreasing area for maintaining required home territories.” Plan, at 65.

PGE’s final mitigation argument is to contend that it can meet its mitigation obligations by making an “in-lieu-of mitigation” payment to the City pursuant to Ordinance 191314. Application, at 35. However, PGE fails to recognize the Ordinance 191314 is only triggered

when mitigation is obligated – in other words, only when no off-Park alternates exist for the development. As outlined, off-park alternatives do exist for the siting of PGE’s powerlines and PGE must use those alternatives.

Moreover, even if the mitigation obligation was triggered, Ordinance 191314 vests with PP&R the discretion as to whether to offer an in-lieu-of fee as an alternative to mitigation. The Ordinance provides that mitigation funds may not be used “for the design of mitigation plans nor general staffing costs,” meaning PP&R would be obligated to provide the funding for those activities.

Most importantly, though, is that Ordinance 191314 does not change the underlying mitigation obligation, it only provides a possible option for PP&R when mitigation is possible. Here, though, mitigation is simply not possible owing to the size of PGE’s proposal, the nature of the ecosystem on the land, and the wholesale disruption to that ecosystem PGE is proposing.

The Coalition’s discussion of mitigation must conclude with a comment on one of the most far-reaching of PGE’s claims. Without the benefit of a before/after scientific study of the area it wishes to clearcut, PGE argues “The Proposed Project will increase biodiversity and expand sensitive woodland resources that are better suited to a warming climate.” This is a mind-boggling claim. This may not be the first time a utility has said something like “clearcutting, high-voltage powerlines, and more power generation will increase biodiversity,” but it certainly must be the first time such a claim has been made about Forest Park. The Coalition is firmly convinced to the contrary. Science shows that clearcutting a forest that has developed tremendous biodiversity over more than 100 years will seriously harm, not aid, biodiversity. As noted by the Bureau of Development Services in response to PGE’s original application, “[T]he scale of proposed impacts and the irreversible ecological effects to an existing high-value, high-functioning ecosystem do not appear to meet multiple approval criteria . . .”

### **THE STATUS OF PGE’S EASEMENT**

Quite apart from the proposal’s non-compliance with the Management Plan are questions as to whether PGE’s easement still exists. The 1971 Easement, attached as Appendix F to PGE’s revised application, granted the Easement “for the purposes herein set forth.” Easement, at 3. The grant envisioned the possibility that PGE would not use the land and provided that “When said property is no longer used, the interests of the Grantee shall automatically terminate.” *Id.*, at 3-4.

The Easement specifically sets forth its purposes:

The grant herein shall be for the purposes permitting Grantee to enter and erect, operate, maintain, repair, rebuild, and patrol one or more electric power transmission lines and appurtenant signal lines, poles, towers, wires, cables, and appliances necessary in connection therewith, in, upon over, under and across the above-described easement and rights-of-way.

Ordinance 132226, through which the City Council authorized the Easement, provides the historical context for the Easement. The Easement, the Council found, was granted to PGE “because of its needs to transmit energy generated at the Trojan plant.” The Trojan powerplant, of course, has long been shuttered.

What does the Easement say should occur in such an eventuality? Paragraph XV of the Easement is clear:

All rights of Grantee hereunder shall cease automatically; (1) if for a continuous period of five years, Grantee shall fail to use said easement and rights-of-way for the purposes stated herein; (b) upon insolvency, adjudication of bankruptcy or appointment of a receiver for the property of Grantee, and with approval of the Common Council of the City of Portland.

Attendees at one of PGE’s public meetings report that a PGE representative stated that the Easement had not been “used” since it was created. PGE’s Revised Application says little about its use of the Easement in the 53 years since 1971, devoting only a single sentence to the issue: “PGE obtained easements from private property owners and the City of Portland (City) in the early 1970s and installed transmission infrastructure on both BPA and PGE property interests as part of its transmission system.” Application, at ii. This phrasing is less than clear as to what “property interests” PGE is describing. As a precondition for the City even considering the Application, the City should require PGE to establish with clear evidence that it has used the Easement since 1971 without any continuous five-year breaks in time.

## **CONCLUSION**

For the foregoing reasons, the Coalition to Protect Forest Park urges the City to deny PGE’s Application.



COALITION TO PROTECT FOREST PARK  
Will Aitchison

November 14, 2024

PGE Harborton Project case file LU 24-01109 CU EN GW

My name is Paul Majkut. I retired in 2014 as Deputy General Counsel of the Bonneville Power Administration Office of General Counsel.

I am submitting these comments in response to the City of Portland November 4, 2024 Request for Response in the above case file number. For a variety of reasons, the City should reject PGE's proposal to install high voltage transmission towers and lines through the pristine high functioning undisturbed North Unit of Forest Park. PGE proposes to clear cut 5 acres of the Park in Phase 3 of the Project and at least 15 more acres in Phases 4 and 5.

Most importantly, PGE has at least one alternative route available, a route that is outside of Forest Park and would do no damage to the Park. For that reason alone, PGE's proposal does not meet the Approval Criteria for Exceptions A through E in Section B on p. 217 of the Forest Park Natural Resources Management Plan, an Ordinance of the City of Portland , Oregon (the Plan).

In its initial application, which was rejected by Portland Parks as incomplete, PGE conceded that if its cost and reliability criteria are met by another alternative route that lessened or avoided impacts on Forest Park, that the Plan requires the choice of the alternative route. See PGE's Initial Application, App. C, at 10. PGE stated that the NW Marina Way route meets reliability criteria and would lessen the impact on Forest Park. *Id.*, at 24.

But, PGE rejected that route because it would supposedly cost more than its Forest Park route (except that the costs of Phases 4 and 5 were not included in the calculation), it would supposedly take too long to expand the 115kV lines to 230kV, and would involve the condemnation of one parcel of property. But the Plan requires that if a non-Park alternative exists, the alternative should be used: "B. no alternative locations exist outside of Forest Park for the Proposal." Plan, at 217. Moreover, the condemnation hypothesized by PGE is not actually required for either Alternative 4 or 8 as PGE can make "a minor deviation to avoid the Residential building." Toth Report, at 22, 28.

PGE has only recently disclosed the Toth report, a study PGE commissioned to study alternatives to the Forest Park route. The Toth Report concludes there are two viable route alternatives to the Forest Park route, both of which would be east of NW Marina Way. The Report labels these routes Alternative 4 and Alternative 8:

Of the initial eight (8) route alternatives considered, two (2) route alternatives only encounter a single Severe impediment and remain feasible for further discussion, as seen in Table 2 below. The remaining Severe impediment for Alternative 4 and Alternative 8, Existing PGE Facilities, lies wholly within PGE's purview and may be surmountable with further study. *Id.*, at 28.

The Toth Report provides considerable specifics about both alternative routes. With respect to Alternative 4, for example, the report states:

In summary, Alternative 4 is a viable route alternative provided the noted impediments from Residential Buildings, Harborton Conservation Area, Pipeline Proximity, and Existing PGE Facilities can be downgraded. Alternative 4 requires purchasing the Residential Building or a

minor deviation to avoid the Residential Building. The existing 115 kV transmission line would need to be relocated elsewhere. Alternative 4 may need to occupy a reduced ROW width in the Harborton Conservation Area. Toth Report, at 22. Alternative 4 utilizes private ROW but avoids most Severe Impediments after mitigation. Its proximity to a single Residential Building along NW Marina Way may be skirted or the parcel purchased outright; the Non-Residential Buildings will either require taller poles or a minor route deviation. The Conservation Area should not be impacted if the existing Harborton-St Helens 115 kV pole line is followed; however, a separate route would then need to be found for the Harborton-St Helens 115 kV transmission line. A railroad crossing permit is still required, but the chances of permit approval are improved by avoiding paralleling the railroad. The buried pipeline should not be impacted if the existing Harborton-St Helens 115 kV pole line is followed; however, as with the Conservation Area impediment, a separate route would need to be found for the Harborton-St Helens 115 kV transmission line. *Id.*, at 28, The Plan, at 217.

The Toth Report similarly evaluates the Alternative 8 route as appropriate for consideration:

Alternative 8 utilizes private ROW but avoids most Severe Impediments after mitigation. Its proximity to a single Residential Building along NW Marina Way may be skirted or the parcel purchased outright. The Conservation Area should not be impacted if the existing Harborton-St Helens 115 kV pole line is followed; however, a separate route would then need to be found for the Harborton-St Helens 115 kV transmission line. A railroad crossing permit is still required, but the chances of permit approval are improved by avoiding paralleling the railroad. The buried pipeline should not be impacted if the existing Harborton-St Helens 115 kV pole line is followed; however, as with the Conservation Area impediment, a separate route would then need to be found for the Harborton-St Helens 115 kV transmission line. Alternative 8 is shorter in distance than Alternative 4 and traverses fewer parcels which creates less potential to impact the community. Alternative 8 follows NW Newberry Rd which is more favorable terrain to descend from the Trojan ROW to Highway 30 compared to the extremely steep hillside of the North Connecting Segment. However, Alternative 8 requires clearing trees that may be objectionable to landowners. With either Alternative 4 or Alternative 8, additional analysis to determine a feasible 115 kV route corridor or alternative construction method may be needed. *Id.*, at 28-29.

In summary, Alternative 8 is a viable route alternative only if it occupies the existing 115 kV pole line to mitigate impacts to the Harborton Conservation Area and Pipeline. An alternative route for the 115 kV transmission line would need to be identified. *Id.*, at 27.

The Toth report did not examine the engineering and operational feasibility of colocating 3 overhead lines in 1 corridor. *Id.*, at 22. It is feasible to place the 115kV line on NW Marina Way under two new 230kV lines. The Bonneville Power Administration did this at both Dworshak and Bonneville dams and other locations. So it is unnecessary to find an alternative route for the 115kV transmission line on NW Marina Way.

Not only has PGE failed to fully investigate these alternatives, it has also failed to include the costs and environmental impacts of Phase 4 & 5 in its Phase 3 analysis. Yet construction of Phase 3 would lock PGE into completing Phase 4 and Phase 5 through Forest Park.

Phase 3 commits PGE to a route that will require clear cutting 5 acres of a high functioning undisturbed North Unit of Forest Park by 2028. By choosing to site the current project inside Forest Park, Phases 4 and 5 will also have to be built inside the Park - for that is where PGE has a supposedly still valid connecting easement for Trojan lines 1, 2. This forecloses any future routes outside Forest Park for phases 4 and 5.

The Phase 4, 5 costs should be included in the comparative analysis with the NW Marina Way route. Phases 4 and 5 will also require clear cutting at least 15 more acres of high functioning undisturbed North Unit of Forest Park as soon as 2030. PGE has tried to segment the Project in a way that avoids disclosing and addressing the full costs and environmental impacts of Phases 4 and 5 of the Project in Forest Park now. This is an additional reason for rejecting PGE's Forest Park route.

PGE should be required to rigorously explore and objectively evaluate reasonable alternatives to the proposed action. This is what the regulations under the National Environmental Policy Act, 40 CFR 1502.14-.16, would require and there is no reason for the City to apply a lesser standard when implementing the Management Plan. PGE's description of the affected environment should include planned actions in the areas covered by Phases 4 and 5. PGE should also identify the environmentally preferable alternative that will maximize environmental benefits, such as addressing climate change related effects, or cause the least damage to the biological and physical environment.

PGE's currently proposed mitigation plan, App. D, cannot and does not mitigate the loss of mature (100+ yr old) conifer and broadleaf deciduous trees (759 trees in total, Exh C at 12), stream, wetland and riparian resources, a diversity of birds, small mammals and amphibians and understory plants. PGE's proposed mitigation does not mitigate this loss in the Management Unit as required by the Plan: "D. Any long term adverse impacts of the proposed action on resource values are fully mitigated within the Management Unit." Plan at 217. BDS Planning Comments, Comment Response Form, at 12.

Moreover, the proposal to clear 4.7 acres of Forest Park for both the installation and re-routing of transmission lines; the scale of proposed impacts and the irreversible ecological effects to an existing high value, high-functioning ecosystem do not meet multiple approval criteria including: Per Minor Amendment Criterion B, it must be demonstrated how the "proposed action is consistent with the Forest Park Natural Resources Plan Goals and Strategies" (found in Chapter 6 of the NRMP). Id., at 10.

Specifically, Conservation Goal #1 (pasted below) speaks to protecting Forest Park's native plant and animal communities, and its soil and its water resources while managing the ecosystem to grow an ancient forest. The proposal to remove 308 trees totaling approximately 5,400-inches diameter breast height is counter to all points listed in the NRMP Conservation Goal #1. Further, other components of the existing ecosystem that will be irrevocably impacted include but are not limited to disruption of soil and ephemeral groundcovers (e.g., trillium, enchanter's nightshade, Western starflower, etc.), alteration of the riparian dynamic adjacent to stream 1 (including removal of shade and disruption of stream substrate), removal of nurse logs and standing snags that provide benefits to both flora (e.g., mushrooms, lichen, moss) and fauna (pileated woodpecker, pygmy owl), and alter existing ecosystem functions (e.g., carbon sequestration, nutrient retention, etc.) that cannot be replicated. Id., at 10.

PGE's proposed mitigation through replacement of mature trees covered by Phase 3 with an oak woodland is speculative. An oak woodland would take 80 years to mature. It would be prone to invasive species. Id. at 12. Moreover, PGE proposes to monitor the oak woodland for only 5 years.

Carbon sequestration by mature trees would also be lost under PGE's proposals. Planting trees in heat islands off site to offset lost sequestration by 100 mature trees is speculative without knowing location, regime, maintenance and monitoring. Id., at 12. It also violates the Plan. PGE's mitigation must take place in the North Management unit of Forest Park as required by the Plan, Id. at 12; Plan at 217.

PGE claims that it would take too long to expand the 115kV lines to 230kV on NW Marina Way. Expansion of those lines "lies wholly within PGE's purview and may be surmountable with further study" as the Toth Report concludes. PGE apparently decided in 2022 to pursue the Forest Park route despite the Toth report recommendation. If PGE now has a timing problem, it is entirely one of its own making. PGE has failed to "rigorously explore or objectively evaluate" the NW Marina Way route and to "identify the environmentally preferable alternative that will maximize environmental benefits, such as addressing climate change related effects, or cause the least damage to the biological and physical environment."

Similarly, in its April 18, 2024 Order 24-096, at 20, the Oregon PUC found that for PGE's 2025 update to its Clean Energy Plan PGE needs to do a more complete analysis of need and evaluation of full range of transmission solutions than it provided in 2023, including non-wire alternatives where appropriate. PGE should provide rigorous and objective analysis of actions it could take to improve reliability of its NW Portland system if it builds the NW Marina Way route. This should include the impact of reconductoring its own lines, its demand response program, load shedding agreements, battery storage, integration of solar panels, and any other actions it could take, including agreements with other utilities, such as BPA reconductoring its lines in Forest Park.

PGE should also apply for any extensions that would be required to implement an alternative that does not degrade the integrity of the Forest Park ecosystem, its protected habitat, the wildlife, the watershed, the carbon sequestration and the climate mitigating services it provides for our city.

Any approval of the PGE Proposal must wait until PGE has fully undertaken a comprehensive study of the cost and environmental impacts of 1 – the NW Marina Way route, and 2- Phases 4 and 5, as well as, Phase 3 within Forest Park.

Paul Majkut

**From:** [Camille Mayeux](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment for PGE's "Harborton Reliability Project" Land use permit  
**Date:** Monday, November 18, 2024 9:25:50 AM

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Hello,

I'm writing to urge Portland Permitting and Development to **deny** the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please **refuse** PGE's land use permit.

Thank you for your consideration,  
Camille Mayeux  
8244 N Wayland Ave  
Portland, OR 97203



**From:** [Emily J. Schnipper](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Deny: Harborton Reliability Project  
**Date:** Monday, November 18, 2024 3:16:35 PM

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Hello, I'm a Portland resident, urging Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming wildlife populations, and impacting recreational areas.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Portland claims to be leading the way on climate justice (see <https://www.portland.gov/bps/climate-action/climate-program>) but this clearcutting project doesn't fit in with those goals. In fact, it would be a big step backwards.

There is significant evidence that PGE's power line expansion is primarily intended for the expansion of Intel in Hillsboro. Intel is also attempting to develop over usable agricultural land, when abundant vacant industrial land remains available. It is not for our "homes, economy, and lives" as PGE claims. Neither of these entities are making sensible planning choices. I understand that Intel is an important local industry, but the negative impact of its immense and growing energy use needs to be considered, especially when it degrades land that most of us assumed would be preserved in perpetuity.

I am strongly opposed to this project. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Emily J Schnipper  
Portland OR

**From:** [Marlon Harris](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Land Use Permit for Harborton Reliability Project  
**Date:** Monday, November 18, 2024 8:51:53 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" power line expansion. As the City previously noted, the "Harborton Reliability Project" would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the power line corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Marlon Harris

**From:** [vicariousvoid](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Stand in Opposition to PGE's Land Use Permit!  
**Date:** Tuesday, November 19, 2024 6:07:57 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Saff Addams 97213

**From:** [Jennifer Johnson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Comment on Harborton Reliability Project  
**Date:** Tuesday, November 19, 2024 6:29:17 PM

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To whom it may concern,

I am writing urging Portland Permitting and Development to deny the land use permit being sought by PGE for the "Harborton Reliability Project" powerline expansion. This project requires the clearcutting of at least 5 acres of forest along the powerline corridor, negatively impacting Forest Park and its wildlife (particularly the Northern Red Legged Frog, whose habitat is directly affected). I hike through the impacted area of Forest Park multiple times per month.

Aside from the negative impact on the natural beauty of this part of Forest Park, it is disappointing that this planned expansion is not for the benefit of our community but instead for the benefit of large tech companies. I am strongly opposed to harming one of our city's most beautiful assets for the benefit of major corporations. Please refuse PGE's land use permit. Thank you for your time and consideration.

Sincerely,  
Jennifer Johnson

**From:** [Evan Benally Atwood](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Comments regarding forest park x pge clear cut  
**Date:** Tuesday, November 19, 2024 8:18:14 PM

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Hello,

I wanted to send in my comments opposing PGE's proposed plan to cut through forest park. I know I'm not alone in this and hope y'all don't let that future happen. We have enough going on - tell them to figure something else out.

Thank you

Evan

**From:** [Lore](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** PGE and Forest Park  
**Date:** Wednesday, November 20, 2024 7:40:42 AM

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To whom it may concern,

My name is Lore and I'm a concerned citizen writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Kim Smith](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE's Forest Park Clearcut  
**Date:** Wednesday, November 20, 2024 10:47:24 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

- Kimberly Smith in 97214

**From:** [Kimberly Smith](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** PGE Clearcutting Forest Park  
**Date:** Wednesday, November 20, 2024 10:50:03 AM

---

Dear Christine, Morgan and whomever else it may concern:

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents such as myself.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

- Kim Smith-Miller



**From:** [Anna Koenig](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Powerline Expansion  
**Date:** Wednesday, November 20, 2024 11:09:39 AM

---

Hello,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

Sincerely,

Anna Koenig

**From:** [cherishtheradish@duck.com](mailto:cherishtheradish@duck.com)  
**To:** [Steele, Morgan](#)  
**Subject:** Say NO to the Harborton Reliability Project  
**Date:** Wednesday, November 20, 2024 1:40:55 PM

---

To whom it may concern,

I write to you today strongly encouraging the Portland Permitting and Development deny the land use permit General Electric (PGE) is seeking for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would create massive adverse effects to Forest Park and its surrounding ecosystem, undermining Forest Park’s management goals, negatively impacting bird and other wildlife populations, and permanently altering recreational areas popular to Portland residents.

If approved, least five acres of forest along the powerline corridor would be clearcut, including an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

The expansion of PGE’s power line will help big corporations but not the everyday Portlander. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from tech facilities like Intel in Hillsboro.

I’ll conclude by emphasizing my fervent opposition to this project due to its projected environmental harm and economic impacts on myself and other folks who live in Portland. Please refuse PGE’s land use permit. Thank you for your time and consideration.

Kindly,  
Ruthie from Sullivan’s Gulch

**From:** [Vive JEMS](#)  
**To:** [Steele, Morgan](#)  
**Subject:** HECK NO TO PGE CLEAR CUT  
**Date:** Wednesday, November 20, 2024 3:43:57 PM

---

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the city previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Parke's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland Residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's powerline expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification. it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economical impacts on myself and other Portland Residents. PLEASE refuse PGE's land use permit. Thank you for your consideration, and for avoiding what could cause a forest fire right here in our town during the summer months. Let's avoid Portland becoming the next Jasper Alaska.

**J E M S C O R P**  
**& V I V E L L C**  
[www.vive-jems.com](http://www.vive-jems.com)



**From:** [Sofia Colours](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please Oppose PGE's Clear Cut - Lets not be like Jasper Alaska Burnt Down to the ground  
**Date:** Wednesday, November 20, 2024 3:47:27 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the city previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Parke's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland Residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's powerline expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification. it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economical impacts on myself and other Portland Residents. PLEASE refuse PGE's land use permit. Thank you for your consideration, and for avoiding what could cause a forest fire right here in our town during the summer months. Let's avoid Portland becoming the next Jasper Alaska down powerline during the dry summer months is all it takes to burn it down. Climate change is here and nothing is safe.

--

**S o f i a C o l o u r s**

**She / Her**

Office: 503.479.5026

Direct Line : 971.231.4041

PO Box 86441

Portland, OR 97286



**From:** [Ruthie C](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Save Forest Park from burning like Jasper Canada SAY NO TO PGE'S CLEAR CUT  
**Date:** Wednesday, November 20, 2024 3:52:16 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the city previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Parke's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland Residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's powerline expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification. it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economical impacts on myself and other Portland Residents. PLEASE refuse PGE's land use permit. Thank you for your consideration, and for avoiding what could cause a forest fire right here in our town during the summer months. Let's avoid Portland becoming the next Jasper Canada down powerline during the dry summer months is all it takes to burn it down. Climate change is here and nothing is safe.

**From:** [Michael](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please Oppose PGE Clear Cut, Forest Park is Portland Legacy  
**Date:** Wednesday, November 20, 2024 3:54:54 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the city previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Parke's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland Residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's powerline expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification. it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economical impacts on myself and other Portland Residents. PLEASE refuse PGE's land use permit. Thank you for your consideration, and for avoiding what could cause a forest fire right here in our town during the summer months. Let's avoid Portland becoming the next Jasper Canada down powerline during the dry summer months is all it takes to burn it down. Climate change is here and nothing is safe.

Kind regards,

Michael Miller  
Project Manager  
JEMS Corporation  
<https://www.vive-jems.com>  
+1 971-231-4356  
4404 SE 27th Avenue  
Portland, OR 97202

**From:** [Jason McNeese](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Land Use Permit In Forest Park  
**Date:** Wednesday, November 20, 2024 3:02:46 PM

---

Subject: PGE Land Use Permit in Forest Park

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Sent from my iPhone

**From:** [Sarah Clark](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Protect Forest Park  
**Date:** Thursday, November 21, 2024 9:19:59 AM

---

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE' use permit.

Thank you for your consideration.

Sincerely,

Sarah Clark



**From:** [Sara B. Crowley](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Thursday, November 21, 2024 9:26:11 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

**Forest Park also plays an important role within Portland's cultural landscape and is a source of pride as one of the largest urban forests and parks in the United States. It is a main attraction for countless tourists and visitors to our fair city **\*\*AND\*\*** it is featured in detail in Colin Meloy's *Wildwood* book series, which is being turned into a stop motion animated feature film at LAIKA.**

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE' use permit.

Thank you for your consideration.

Sincerely,

Sara Crowley

--

**Sara Crowley** (she/her)  
310.806.1411

**From:** [Gabriel Liston](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Subject: Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Thursday, November 21, 2024 9:42:21 AM

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Steele,

Yes, this is mostly a cut and paste email about PGE's plans to rip through Portland's Lungs, but I am a St Johns resident and artist who has spent time tracing the impacts of [bad development ideas](#) on the Tualatin Ridge and its surrounding wetlands.

The potential outcomes from a fire on the Ridge are too destructive to allow any encroachment on the ecosystem's safety or resiliency.

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Yours,

Gabriel Liston

[Lastwater](#)  
503 869-8411

**From:** [Lydia Kiesling](#)  
**To:** [Sierra Aleman](#)  
**Cc:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Re: Please stand with Portlanders like myself and fight against PGE's Harborton proposals  
**Date:** Thursday, November 21, 2024 9:45:54 AM

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Dear Sierra,

Thank you so much for getting in touch. I am passing along your message to the councilor-elect. She is currently in the process of staffing and onboarding in preparation to take office in January, but I know she is ready to get to work and is reading all the correspondence that comes her way.

Yours,  
Lydia

On Thu, Nov 21, 2024 at 3:33 AM Sierra Aleman <[sealchemistry.labs@gmail.com](mailto:sealchemistry.labs@gmail.com)> wrote:

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,  
Sierra Alemán  
SE Portland and district 3 resident

--

Lydia Kiesling  
Campaign Manager  
Tiffany Koyama Lane for Portland City Council District 3

**From:** [Amanda Gallegos](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park! Deny PGE Land Use Permit  
**Date:** Thursday, November 21, 2024 10:23:33 AM

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Dear Morgan, Christine, and whomever else this may concern,

I, Amanda Gallegos, am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The City prides itself on providing its residents one of the largest urban parks in the United States. Providing this space offers countless health benefits, including physical and mental, for our community. Removing the five required acres from Forest Park along the powerline corridor significantly impacts user access and shows prioritization of tech expansion over the community's needs, as well as causes significant damaging impacts for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit, and reconsider alternative options for this project.**

I thank you for your time and consideration.

--

**Amanda Gallegos (she/her)**  
**Portland, OR**

**From:** [Molly Gregerson](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Clear Cutting Concerns  
**Date:** Thursday, November 21, 2024 10:33:48 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the city previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Parke's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland Residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's powerline expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification. it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economical impacts on myself and other Portland Residents. PLEASE refuse PGE's land use permit. Thank you for your consideration, and for avoiding what could cause a forest fire right here in our town during the summer months. Let's avoid Portland becoming the next Jasper Alaska down powerline during the dry summer months is all it takes to burn it down. Climate change is here and nothing is safe.

Thank you,

Molly Gregerson  
Direct Line : 971-220-8419  
PO Box 86441  
Portland, OR 97286  
[www.vive-jems.com](http://www.vive-jems.com)



**From:** [Kathryn Howard](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Anxious to have the city Deny PGEs Land Use Permit in Forest Park  
**Date:** Thursday, November 21, 2024 10:44:03 AM

---

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

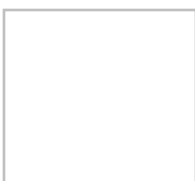
Sincerely,

Kathryn

--

Kathryn Howard (she/her)

Portland Fruit Tree Project  
Events and Partnership Manager  
503.902.8550



*We joyfully care for and harvest fruit trees that feed and shade our neighborhoods. [Join us!](#)*



*We joyfully care for and harvest fruit trees that feed and shade our neighborhoods. [Join us!](#)*

**From:** [Jakob Foley](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Thursday, November 21, 2024 11:01:18 AM

---

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,  
Jakob Foley



**From:** [Laurel Temple](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Forest Park Transmission Line  
**Date:** Thursday, November 21, 2024 11:33:51 AM

---

This is a very bad idea which you should not pursue due to the habitat loss of vital species in the forest ecosystem.

Sincerely

Laurel Temple

**From:** [Mark Reback](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Thursday, November 21, 2024 12:04:19 PM

---

To whom it may concern,

I strongly urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Mark Reback

Battle Ground, WA

**From:** [Jessica Boudreaux](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Re: FP Clearcutting Project  
**Date:** Thursday, November 21, 2024 12:33:20 PM

---

To whom it may concern,

I'm writing to plead with the Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents and plan to make my voice heard. Please refuse PGE's land use permit. Thank you for your consideration.

-Jessica Boudreaux

**From:** [Kate Greenblatt](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Thursday, November 21, 2024 1:15:50 PM

---

Dear Ms. Steele and Ms. Caruso,

I'm writing today to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" power line expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

Our forests are crucial to mitigating climate change by absorbing our CO2 emissions, creating shade, strengthening biodiversity, and serving as a safe haven for human and nonhuman life. Now is NOT the time to be causing any more harm to the precious percentage of forest we have left globally. At this point in our climate and environmental crisis, every wooded acre counts.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Kate Greenblatt, Portland resident

**From:** [Marin Hart](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny PGE Land Use Permit & Protect Forest Park!  
**Date:** Thursday, November 21, 2024 1:18:36 PM

---

Hi Morgan and Christine!

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.  
Thank you for your consideration.

Sincerely,  
Marin Hart



Virus-free. [www.avast.com](https://www.avast.com)

**From:** [Nancy Yuill](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Thursday, November 21, 2024 1:19:12 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

We can never get back the ecological benefits of the land destroyed by the powerline corridor. And you know alternatives can be developed. Maybe they cost a little more, maybe they take a little longer, but in the end, another way is possible and must be pursued.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Nancy Yuill

--

Nancy Yuill  
Pronouns: She/Her

**From:** [Pamela Statz](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Thursday, November 21, 2024 1:49:36 PM

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To Morgan Steele

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

You have to stop PGE! The park belongs to the city and the people of Portland - not to Intel, not to PGE. There are so many other ways they power this facility. DON'T LET THEM BE LAZY! And Intel probably won't build the facility anyway!

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE' use permit.

Thank you for your consideration.

Sincerely,

[YOUR NAME]

--

**Pamela Statz**

Author of THORN CITY from Ooligan Press (5/14/2024)

[pamelastatz.com](http://pamelastatz.com)

[info@pamelastatz.com](mailto:info@pamelastatz.com)

415.577.9149

..... / ..- / -..... / -.-.....



**From:** [Jennifer Starkey](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Thursday, November 21, 2024 3:44:25 PM

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Hi Morgan and Christine,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

From Carole Hardy of [Forest Park Conservancy](#):

"PGE's revised land-use application filed with the City of Portland proposes to clear cut 4.7 acres of 150+ year old Douglas fir and bigleaf maple trees and proposes to remove 5 white oak trees estimated to be 170-500 years old. In total, the proposal includes the removal of 376 living trees, and 21 dead trees. It will permanently fill at least two wetlands and disrupts two streams that support multiple species of aquatic wildlife."

This is not acceptable in a time when all these trees (the shade they make and the carbon they hold, the water they clean and the soil they protect, the food and shelter and oxygen they create for countless species in our community) need all the help they can get as we progress in the climate crisis.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Jennifer Starkey  
Education Director  
She / Her pronouns  
[Columbia Slough Watershed Council](#)  
7040 NE 47th Ave || Portland, OR 97218  
\*New!\* Cell: (971) 393 7566  
[instagram.com/ColumbiaSlough](#)  
[columbiaslough.org/education](#)



**From:** [Karen Fletcher](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please do not let PGE clear cut Forest Park  
**Date:** Thursday, November 21, 2024 5:56:34 PM

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So many reasons to protect this beautiful, fragile part of Portland. PGE will need to find a better way to extend power to everyone. We must protect the living beings that depend on that acreage for survival.

Thank you.

Karen Fletcher  
5040 SE Henry  
97206

**From:** [A Hansen](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Urgent: Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Thursday, November 21, 2024 6:23:17 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. I am very worried that the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

It's time to cut our energy consumption so we can stop making the climate emergency worse. I ask you to consider my comments seriously as well as those who are also contacting you. The imperiled species also need us to take a stand and say no! to more expansion, more climate harm and instead treat nature as the life source it is for the human race as well as flora and fauna.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE' use permit.

Thank you for your consideration.

Sincerely,

Amy Hansen

**From:** [annie](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park & PGE  
**Date:** Thursday, November 21, 2024 7:37:18 PM

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Hi,

I am a Portland resident and climate activist. I ask that you deny PGE the land use permit they are requesting for the Harborton Reliability Project expansion.

As humans, we need to reduce our electricity consumption and our consumption in general, not expand energy projects that harm trees and wildlife, and by extension, people. Expansion is NOT inherently good. It is usually bad.

Forest Park is an important resource for all Portlanders and visitors. We need to preserve and protect nature and help people reduce their consumption.

Please refuse PGE the permit.

Thanks

annie capestany

97202

**From:** [Olivia Ray](#)  
**To:** [Steele, Morgan](#); [christinecaruso@portlandoregon.gov](mailto:christinecaruso@portlandoregon.gov)  
**Subject:** Possible Clear Cuts to Forest Park by PGE  
**Date:** Thursday, November 21, 2024 8:40:38 PM

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To whom it may concern,

I'm writing to join the many voices urging Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" power line expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. We are fortunate to steward the largest urban park in the USA and we should be taking that duty seriously. Many people in the city of Portland and in the surrounding suburbs and exurbs visit Forest Park because of its unique character and for the opportunity to find refuge and solace in nature so close to home.

By allowing a clear cut, not only would the city be inflicting considerable ecological damage, but it would also be doing so for mostly big tech businesses in the suburbs. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Best,  
Olivia Ray  
zipcode 97214

**From:** [Dana Mozer](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Thursday, November 21, 2024 9:48:02 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Dana Mozer, Family Nurse Practitioner

Portland, Oregon

**From:** [Lily Harold](#)  
**To:** [Steele, Morgan](#)  
**Subject:** As a Portland Native, Please Hear Me Out  
**Date:** Thursday, November 21, 2024 10:18:10 PM

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I'm reaching out today to urge Portland Permitting and Development to deny the land use permit currently being sought by PGE for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause ***significant impacts*** to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents.

Please refuse PGE this permit. Thank you for your consideration.

Best,  
Lily Harold



**From:** [kalli mason](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protect forest park- Deny PGE Land Use Permit  
**Date:** Friday, November 22, 2024 6:19:16 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

The Climate smart thing to do is to leave as many trees still standing. We are rapidly losing biodiversity, especially in cities and can't risk harming this further. Growth of certain industries shouldn't be at the sake of the planet, that mentality is why we're in a climate crisis.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Kallista Mason

**From:** [Peyton Priestman](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Friday, November 22, 2024 10:15:41 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

Forest Park is a vital natural area and part of what makes Portland such an excellent place to live. Access to nature is incredibly important for our physical and mental well being, and many cities have sacrificed this in favor of complying with the demands of industry and corporate interests. Please value the needs of our citizens and our environment above those corporate interests.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Peyton Priestman

**From:** [Kim Brown](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park - PGE  
**Date:** Friday, November 22, 2024 10:51:21 AM

---

Hi Morgan,

I've heard recently about Portland General Electric trying to get a land use permit to put in a powerline expansion through Forest Park. I am asking you to deny this permit. The Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest including 150+ year old douglas firs. I am particularly concerned about the plan to fill wetlands, a rapidly diminishing ecosystem that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you,

Kim Brown

**From:** [Laura Nash](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please deny PGE's land use permit in Forest Park  
**Date:** Friday, November 22, 2024 11:43:07 AM

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Dear Morgan Steele,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

Now is the time to protect our natural environment in every way we can. For ourselves and for future generations, we need to do everything in our power to slow climate change and prevent climate catastrophe.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Laura Nash

**From:** [P. Oaks](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Reject PGE permit and protect Portland's iconic Forest Park  
**Date:** Friday, November 22, 2024 4:14:11 PM

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Hello,

I strongly urge Portland Permitting and Development to stop the clearcutting of our community's beloved Forest Park. Please deny the proposed Portland General Electric (PGE) land use permit currently being sought for the "Harborton Reliability Project" powerline expansion. Its impacts would be unacceptable especially at this time of climate crisis and rapid biodiversity loss.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

Portlanders are strongly opposed to this project for good reasons. Please respect our wishes, protect our native biodiversity, and refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Mr. Phoenix Oaks

Portland, OR 97217

**From:** [maria nazzaro](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protect forest park  
**Date:** Friday, November 22, 2024 4:34:41 PM

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Subject: Protect Forest Park - Deny PGE Land Use Permit

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

**From:** [Mali Fischer](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny PGE Land Use Permit, please protect Forest Park  
**Date:** Friday, November 22, 2024 7:22:49 PM

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To whom it may concern;

I'm writing to express my opposition to the Harborton Reliability Project, and urging Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for this power line expansion.

This project, which requires the clearcutting of at least five acres of forest along the powerline corridor, would negatively impact Forest Park and its ecosystems. This includes an area that provides crucial habitat and crossing for the imperiled Northern Red Legged Frog. It will harm birds and other wildlife populations. Not to mention, Forest Park is beloved and used by Portlanders, it is a very important part of our city and should be protected.

PGE's power line expansion will not benefit Portland residents. It seems to only benefit the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project, which also threatens to rezone valuable acreage of farmland.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration. Sincerely,

Mali Fischer-Levine

**From:** [Tara Ohta](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Saturday, November 23, 2024 8:33:54 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Tara Ohta

Sent from my iPhone



**From:** [Sam W](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Project Forest Park - Deny PGE Land Use Permit  
**Date:** Saturday, November 23, 2024 2:04:18 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" power line expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clear cutting of at least five acres of forest along the power line corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

As someone who regularly accesses forest park for recreational purposes and recognizes the ecological importance of this prized area, I urge you to please do what is best for the Portland community.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Sam Wardwell

***Pronouns: they/them***

***I acknowledge the Traditional Stewards of the land I work on as the first people of this country.***

Sent with [Proton Mail](#) secure email.

**From:** [Valita Volkman](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Sunday, November 24, 2024 7:41:51 AM

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Forest Park is a peaceful place for me. I have walked the trails and marveled at the beauty of and photographed the vegetation, birds, creeks, waterfalls, etc. My most memorable encounter in the park was when a friend and I found a young Barred Owl perched directly over the path. I honestly haven't visited that many times, so I would like to explore more!

That being said, PGE's proposal to develop within Forest Park is troublesome. If it happens, it will erode soil, degrade the streams, get rid of precious habitat that many species call home – including the Red-legged Frog, which is a species of concern, and disrupt the ecosystem as a whole. It would set the precedent for future development in Forest Park, especially since PGE has already said that this is a multiphase project. Approval of the project would be in direct opposition of the Forest Park Natural Resources Management Plan, in which the top priority is cultivating old growth forest within Forest Park. Cutting down mature trees and planting new, different ones is definitely not aligned with that goal. Developing within Forest Park is not only concerning, it is also unnecessary. PGE has stated that there are multiple other locations that they can update their power grid.

In conclusion, I want to keep returning to Forest Park to discover more. When I do, I want to see it thriving and improving; I want to see it become an old growth forest. Please reject PGE's proposal. The flora, fauna, and people will thank you!

**From:** [michael.mcgehee26@gmail.com](mailto:michael.mcgehee26@gmail.com)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project  
**Date:** Sunday, November 24, 2024 12:29:42 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents.

Forest Park is a treasure - Please refuse PGE' use permit.

Thank you for your consideration,

Michael McGehee

**From:** [Jenna M. Ayers](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park  
**Date:** Sunday, November 24, 2024 12:39:10 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

When I was deep in depression and anxiety, I learned to love hiking by exploring Forest Park. My favorite trail is the BPA trail, near the proposed clear cutting, because of the trees lining the trail with their lovely crown-shyness in the summer. I have enjoyed seeing wildlife here, including a North American porcupine and many beautiful butterflies. This place is incredibly special and spiritual to me.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Best,

Jenna

--

Jenna Ayers (she/her)  
J.D. 2024, Lewis and Clark Law School

**From:** [Olivia Flamm](#)  
**To:** [Steele, Morgan](#)  
**Subject:** No to Clearcutting  
**Date:** Sunday, November 24, 2024 12:48:44 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

Ophelia Flamm

**From:** [Alli Bratt](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny PGE permit for Forest Park  
**Date:** Sunday, November 24, 2024 1:01:44 PM

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Hello Morgan and Christine,

Thank you for taking the time to read my email. I'm writing to you both today to urge you to deny the permit for PGE's expansion in Forest Park.

Forest Park is a beautiful place loved by Portlanders, visitors, and home to many species of plants, animals, and insects. I disagree with the clear cutting of a portion of it for PGE's Harborton Reliability Project. Originally they wanted to cut down 5 acres, which is already too much, but now it's 20 acres?! No! This is not okay. This is a huge disruption of wildlife and could cause disruptions in ecosystems and invite opportunity for invasive plants and species.

Please, deny PGE's permits and tell them no!

Thank you for your time,

Alli Bratt  
Portland resident since 2009

**From:** [Martha Noblet](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Oppose PGE's Forest Clearing Proposal  
**Date:** Sunday, November 24, 2024 1:26:43 PM

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To Whom it May Concern,

I am writing to express my strong opposition to the land use permit sought by Portland General Electric (PGE) for their proposed project, which would result in the clear-cutting of several acres of forest in and around Forest Park. This project poses a significant threat to Portland's natural ecosystem, wildlife populations, and cherished recreational spaces.

The forest areas impacted by this proposal are vital habitats for numerous species, including the Northern Red-Legged Frog, and serve an important role in supporting biodiversity, water quality, and air quality in the region. Removing large swaths of forest would destabilize these ecosystems and diminish the natural beauty and functionality of Forest Park, which is highly valued by Portland residents.

PGE's claim that this project addresses increased electricity demand primarily benefits industrial expansion in Hillsboro, such as the growing technology sector, rather than serving the broader Portland community. Infrastructure growth must not come at the expense of vital environmental resources, particularly when alternative solutions for expanding energy capacity could be explored with far less ecological impact.

Portland has long prioritized sustainability and the preservation of natural spaces, and approving this project would represent a significant departure from these values. I urge you to deny PGE's permit and seek solutions that meet the region's energy needs while safeguarding our forests and wildlife.

Thank you for considering my comments. I trust that Portland Permitting and Development will prioritize the environmental and public interests of its residents over corporate convenience.

Sincerely,

Martha Noblet

Sent from my iPhone



**From:** [Alli Bonifacio](#)  
**To:** [Steele, Morgan](#)  
**Subject:** SAVE FOREST PARK  
**Date:** Sunday, November 24, 2024 1:50:03 PM

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I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you

Best,  
Allie Bonifacio

**From:** [Heather Lobitz](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Deny permit for the Harborton Reliability Project powerline expansion  
**Date:** Sunday, November 24, 2024 1:53:33 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration,

Heather Lobitz  
Pronouns: she/her  
[h.lobitz@gmail.com](mailto:h.lobitz@gmail.com)  
971-226-4061 (cell)  
9008 N Saint Johns Ave  
Portland, OR 97203

**From:** [Ivy Rose MacNair](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** deny the land use permit  
**Date:** Sunday, November 24, 2024 2:02:14 PM

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Hello, I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents.

Please refuse PGE's land use permit.

Thank you for your consideration.

**From:** [Tobias](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Harborton Reliability Project  
**Date:** Sunday, November 24, 2024 2:19:48 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the fire line corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents.

Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Tobias Probst

**From:** [Jaimeleigh Salazar](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Refuse to cut in Forest Park  
**Date:** Sunday, November 24, 2024 2:31:31 PM

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Hello Morgan and Christine,

My name is Jaimeleigh Salazar and my husband and I are residents of Forest Park. We have lived off skyline for over 10 years and respect and love the nature of our neighborhood. I am also a former employee of the City of Portland, Bureau of Development Services, and deeply understand the pressure to do business while also maintaining the uniqueness that makes Portland the magical city that it is. The residents of Portland care deeply about defending the city against corporate greed, as they know it can have detrimental consequences to our environment. Intel and Portland General Electric should NOT be allowed to cut 20+ acres of land for chip development. Please do NOT grant the permit for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

Forest Park is a sanctuary to wildlife and residents alike. It's a destination for bird watchers, hikers, and sightseeing. Allowing this permit could have a domino effect, letting other corporations know that in the future, they too could have a piece of this beautiful land and destroy it. Don't let them win. Come out to Forest Park and see the beauty in this sacred area. Set up a future for this city that you are proud of being a part of. Please use your voices to defend Forest Park and stop these companies from clearing these magnificent trees. Protect Forest Park like it's your home, because it is.

Jaimeleigh Salazar  
[salazar.jleigh@gmail.com](mailto:salazar.jleigh@gmail.com)  
5618436675

**From:** [Chad Murray](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Sunday, November 24, 2024 2:48:06 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

I am strongly opposed to this project due to its ecological and economic impacts on Portland residents.

As a resident of Portland for nearly 6 years, I've enjoyed the recreation and community that Forest Park brings. The familiar faces and surroundings are what truly make this natural space and city one of a kind. It must be preserved for all present nature lovers and the many generations to follow.

Please refuse PGE's land use permit. Thank you for your consideration.

**Sent from my iPhone**

**From:** [Dylan Pipkin](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Portland permitting - DO NOT CUT  
**Date:** Sunday, November 24, 2024 3:01:50 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Zan Tewksbury](#)  
**To:** [Steele, Morgan](#); [ChristineCaruso@portlandoregon.gov](mailto:ChristineCaruso@portlandoregon.gov)  
**Subject:** Public comment on proposed logging in Forest Park by PGE  
**Date:** Sunday, November 24, 2024 3:19:40 PM

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To whom it may concern,

The land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion should be denied for many reasons, not least of which it is not in the interest of and would not serve the people of Portland. City of Portland has already found that the Harborton Reliability Project would cause significant disruption to Forest Park (the largest inner city parkland in the US), would undermine Forest Park's management goals, would cause harm to wildlife populations, and would impact recreational and well-being spaces used by and vital to the health, well-being, and enjoyment of Portland residents, including me and my family for many years.

This PGE project currently seeks to clear cut **up to 20 acres** of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

PGE's power line expansion will not benefit Portland residents, but will instead provide energy infrastructure investments for the rapidly expanding technology sector in Hillsboro. While PGE claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at their own data that the vast majority of increased demand is coming from these tech facilities outside the City of Portland.

I strongly oppose this proposed project, which has already been amended from its original scope to quadruple the area of impact. Approval is not in the interest of the people of Portland, and once started, could reasonably expect to be expanded again to a completely unsustainable level. You are urged to deny PGE's land use application. Thank you for your consideration.

Zan Tewksbury, JD  
NE Portland  
Resident since 1984 and avid user of Forest Park



**From:** [Nicholas Baecker](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Tree cutting in forest park  
**Date:** Sunday, November 24, 2024 3:39:58 PM

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Hello there,

My name is Nicholas Baecker and I've lived in forest park for 12 years now. One of the reasons I moved to Portland from the rural Midwest was because it was disgusting to watch people and corporation destroy land and trees for alleged improvements which in the end were all bullshit to line someone's pocket who absolutely did not need it.

When I heard about what you were allowing in forest park it made me sick to my stomach.

There is already enough damage happening caused by PGE and intel and now you want to allow them to steal even more of what little forest sanctuary we have left in the city?

I hate that this is even something you are considering because it's shortsighted and profit driven. I beg you to do what's right for once instead of what benefits the disgusting 1 percent.

Please leave the forest park preserve alone! I'm sure you can find other things to destroy elsewhere but why are you insistent on taking what little we have left in our multnomah county neighborhoods. I always felt they paying insane property taxes in this county at least would help keep the wildlife and trees safe from destruction but I guess you have been mismanaging our money for too many years and now you think you see a new way to fuck more people over under the radar.

Please stop being shitty humans and do something that isn't just about you and your money grubbing club for once.

Regards,

Nicholas Baecker

**From:** [Joan J2](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Sunday, November 24, 2024 4:11:07 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Joan Joselyn

**From:** [Mikaela Kate Hennessey](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Sunday, November 24, 2024 4:17:40 PM

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I may sound rude by not addressing you with respect but I will do that when I see that you fight against any clear cutting of trees in Forest Park. To leave the trees and the meadows be, that is the kind of respect I would like from you.

Mikaela kate

<https://positivelyarchetypal.etsy.com>

**From:** [noelle brown](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** No to PGE's Harborton Project  
**Date:** Sunday, November 24, 2024 4:19:40 PM

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To whom it may concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the city previously noted, the Harborton Project would cause significant negative impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The Project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's powerline expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro, including facilities like the Intel expansion project. While PGE claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am STRONGLY OPPOSED to this project due to its ecological and economic impacts on wildlife and other Portland residents.

Please refuse PGE's land use permit! Thank you for your consideration.

Sincerely,

Well Rivera  
A very concerned Portland resident

**From:** [Ben B](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Clear Cut  
**Date:** Sunday, November 24, 2024 4:25:54 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Rose Kearsey](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Refusal of PGE's Land Use Permit  
**Date:** Sunday, November 24, 2024 4:36:49 PM

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Dear Morgan and team,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently sought out by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As the City previously noted, the Harborton Reliability Project would significantly impact Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular with Portland residents. Forest Park is home to many endangered and/or protected species, such as bald eagles and giant Pacific salamanders.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled northern red legged frog in addition to the previously mentioned animals.

I highly encourage you to watch the recent segment on OPB about these frogs, and how they are crucial to biodiversity in Forest Park: <https://youtu.be/ud3gA3aa9RI?si=mMxIwxUIPLmYkeuT>

Additionally, PGE's power line expansion will not benefit Portland residents but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Forest Park is a gem in our great city and this is not necessary.

Please refuse PGE's land use permit.

Thank you,  
Rose F. Kearsey

**From:** [Evelina Nessler-Cass](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Forest Park Clearcut  
**Date:** Sunday, November 24, 2024 4:55:05 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

**From:** [Ashley Boucher](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project Comment  
**Date:** Sunday, November 24, 2024 4:59:48 PM

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Hi there,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents.

Please refuse PGE's land use permit. Thank you for your consideration.



**From:** [Sarah Falletti-Velasco](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** In defense of Forest Park  
**Date:** Sunday, November 24, 2024 5:03:48 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clear cutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economical impact on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration,  
Sarah Falletti-Velasco

**From:** [Chase Clark](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project  
**Date:** Sunday, November 24, 2024 5:36:01 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

^ ^ Chase  
The Black Squirrel  
[www.blacksquirrelberkeley.com](http://www.blacksquirrelberkeley.com)

**From:** [Chris Woloszyn](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Harborton Reliability Project  
**Date:** Sunday, November 24, 2024 5:44:52 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro, including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration,

Chris Woloszyn  
Multnomah County District 2  
845-699-6277

**From:** [Stephanie Soquet](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE  
**Date:** Sunday, November 24, 2024 5:45:10 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding the "Harborton Reliability Project" powerline ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration,  
Stephanie Soquet.

**From:** [Ben Davis](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Sunday, November 24, 2024 5:45:53 PM

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Dear fellow Portland enjoyer,

I'm writing in hopes to influence you, Portland Permitting and Development to consider the agreement proposed in the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. I'm concerned, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please hold PGE accountable for when considering its land use permit.

sincerely,  
Benjamin Davis  
cell- 503 805 2564

**From:** [Maxxie Barr](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Concerns Regarding the PGE Harborton Reliability Project  
**Date:** Sunday, November 24, 2024 6:13:13 PM

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Hello,

My name is Maxxie Barr and I live in NW Portland. I am deeply concerned about PGE's recent proposal and its impact on Forest Park. Their request to clearcut 5+ acres of land in the park will cause undeniable harm to the local ecosystem, further endangering struggling bird populations and the red-legged frog.

It is my understanding that this project will allow them to build a new electrical transmission line which they state will support the needs of local communities, however its design rather points to it supporting new industrial facilities in Hillsboro.

I recognize the need to supply power to these businesses that provide jobs for many community members, but I cannot support the utilization of delicate habitats slated to eventually become old growth forests simply because it would be easier on PGE's bottom line. There are plenty of other viable options that would not do nearly as much harm as clear-cutting sections of Forest Park, it just may cost them more money. Regardless, PGE will not leave Portland and take their business elsewhere if you deny this proposal. I urge you to deny it for the sake of Portland's pride and help maintain the vision of a brighter future for all Portlanders.

Thank you,

Maxxie Barr

**From:** [Quillan Caskey-Koldewyn](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton reliability project  
**Date:** Sunday, November 24, 2024 6:17:34 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Quillan Caskey-Koldewyn

**From:** [Sandra Siegner](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Date:** Sunday, November 24, 2024 6:18:23 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE' use permit.

Thank you for your consideration.

Sincerely,

Sandra Siegner



**From:** [Josie Moberg](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Deny PGE's Land Use Permit for the Harborton extension  
**Date:** Sunday, November 24, 2024 6:20:55 PM

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**From:** [Jaimeleigh Salazar](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Refuse to cut in Forest Park  
**Date:** Sunday, November 24, 2024 2:31:31 PM

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Hello Morgan and Christine,

My name is Jaimeleigh Salazar and my husband and I are residents of Forest Park. We have lived off skyline for over 10 years and respect and love the nature of our neighborhood. I am also a former employee of the City of Portland, Bureau of Development Services, and deeply understand the pressure to do business while also maintaining the uniqueness that makes Portland the magical city that it is. The residents of Portland care deeply about defending the city against corporate greed, as they know it can have detrimental consequences to our environment. Intel and Portland General Electric should NOT be allowed to cut 20+ acres of land for chip development. Please do NOT grant the permit for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

Forest Park is a sanctuary to wildlife and residents alike. It's a destination for bird watchers, hikers, and sightseeing. Allowing this permit could have a domino effect, letting other corporations know that in the future, they too could have a piece of this beautiful land and destroy it. Don't let them win. Come out to Forest Park and see the beauty in this sacred area. Set up a future for this city that you are proud of being a part of. Please use your voices to defend Forest Park and stop these companies from clearing these magnificent trees. Protect Forest Park like it's your home, because it is.

Jaimeleigh Salazar  
[salazar.jleigh@gmail.com](mailto:salazar.jleigh@gmail.com)  
5618436675

**From:** [Stefanee Cherico](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest park  
**Date:** Sunday, November 24, 2024 6:48:29 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Forest park has been a place of peace and refuge for myself and I'm sure millions of others and public landmark of Portland. Please reconsider your project as destroying this land will affect the wellbeing of the city and its inhabitants. We need a place to and enjoy nature. Let us be

Thank you  
Stefanee Cherico

**From:** [Claire Barry-Thomas](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Thoughts on the Harborton Reliability Project  
**Date:** Sunday, November 24, 2024 6:51:00 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

As a frequent user of the amazing Forest Park trail systems, I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your time,  
Claire

**From:** [Sierra Mejia](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Don't let PGE endanger forest park  
**Date:** Sunday, November 24, 2024 6:58:58 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Sierra Mejia, resident of north Portland, frequent hiker of forest park

**From:** [Erin Belisle](#)  
**Subject:** Preserve Forest Park / Reject PGE Clearcutting  
**Date:** Sunday, November 24, 2024 2:25:41 PM

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I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Erin Belisle

**From:** [Salem B](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Permit Proposal  
**Date:** Sunday, November 24, 2024 7:36:35 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

A Southeast Portland Resident

**From:** [Eve Bennett](#)  
**To:** [Steele, Morgan](#)  
**Subject:** No cutting in Forest Park  
**Date:** Sunday, November 24, 2024 7:46:14 PM

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Hello,

I am a long term resident of the St. John's neighborhood in Portland.

I am writing to express my concern about PGE's proposed 20 acre clear cut in Forest park that will fill wetlands and disrupt crucial habitat to endangered amphibians such as the Oregon native red-legged frog.

One of the things that makes Portland so special is our interconnection with natural areas. Forest park is a critical thoroughway for many species that help keep a diverse and balanced ecosystem within our city. The trees that are at risk of being demolished are currently acting as carbon sinks in a climate crisis, and absorbing rain that would otherwise be running off into our waterways.

Clear cutting these trees increases risk for erosion, landslides and silt washing into fish habitat. The scrubby underbrush that grows after a mass cutting event is at higher risk for quickly spreading fires. None of these events are in the best interest of the communities surrounding forest park, or the ecosystems existing within it.

Please work to ensure that the special interests of a few don't destroy Forest Park for us all.

Thank you,

Eve Bennett  
Portland Oregon



**From:** [Jonathan Sims](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Powerline Expansion Project Affecting Forest Park  
**Date:** Sunday, November 24, 2024 7:49:07 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Jonathan Sims

**From:** [Bones](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project  
**Date:** Sunday, November 24, 2024 8:08:56 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

This means the utmost importance to my family, community, portland's future generations, and myself.

Thank you for your consideration.

Cordially,  
Ryden E. Duncan

**From:** [Laura Darnell](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Concerning PGE expansion through Forest Park  
**Date:** Sunday, November 24, 2024 8:15:05 PM

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To whom it may concern,

As a citizen of Portland who moved here for places like Forest Park, I really want to urge you to deny the permit Portland General Electric is seeking for the “Harborton Reliability Project” powerline expansion. The plan they have in place will have dire impacts on species of birds and reptiles native to the area, along with potentially harming the salmon we’re trying to recoup the population of. It also goes against Forest Parks forestry management goals and removes 5 acres of recreational space for locals and tourists.

The plan stating they want to clear cut that acreage to boost the power of the tech sector in Hillsboro as opposed to finding a solution that doesn’t destroy that eco system is lazy and will ruin one of the best parts of the city. PGE’s plan cutting through Forest park just gives way for them to destroy more of it and I’m greatly opposed to them moving forward with that plan. As a local I hope that you vote to deny it to protect the ecological system within Forest Park and to protect the residents from even more rising costs from PGE and their failure to comply with Forest Parks Natural Resources Management Plan.

Again, please refuse PGE’s land use permit.

Thank you for your consideration,  
Laura

**From:** [Natane](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Expansion Concerns  
**Date:** Sunday, November 24, 2024 8:27:02 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I strongly oppose this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for being so considerate.

**From:** [Olivia Maxwell](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE expansion concerns  
**Date:** Sunday, November 24, 2024 8:37:34 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Thank you,  
Olivia Maxwell

**From:** [Kate Spaulding](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please DENY Portland General Electric's permit application!  
**Date:** Sunday, November 24, 2024 8:57:04 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Kate Spaulding

**From:** [sriya chinnam](#)  
**To:** [Steele, Morgan](#)  
**Subject:** DEFEND FOREST PARK: DENY LAND USE PERMIT TO PGE!  
**Date:** Sunday, November 24, 2024 9:04:08 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

Forest Park is a defining feature of Portland, cherished by residents and visitors alike. Its preservation is vital to the city's identity, history, and environmental health. Losing any part of it would deeply impact our community and future generations.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Laura Dunn](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Stop PGE clear cutting forest park public comment  
**Date:** Sunday, November 24, 2024 9:30:03 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Laura Dunn  
Portland resident

**Laura Dunn**  
**She/Her/Hers**  
**Artistic Director**  
**The Broken Planetarium**  
[www.brokenplanetarium.org](http://www.brokenplanetarium.org)  
[lauradunn.bandcamp.org](http://lauradunn.bandcamp.org)



**From:** [Kianna Lee](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** PGE FOREST PARK  
**Date:** Sunday, November 24, 2024 10:09:48 PM

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To whom it may concern (every single person in the region)

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. (AI- how about enforcing companies to comply with energy consumption regulations instead)

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

I grew up in this park. It's a beautiful place unlike anywhere else and it should be protected and cherished for future generations. Enough is enough. This is unnecessary and will have detrimental environmental effects, that are completely against what portland claims to stand for.

Anna Wolf  
Multnomah Village Portland

**From:** [Kathryn Campbell](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Prevent Forest Park Clearcutting  
**Date:** Sunday, November 24, 2024 10:35:17 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Kathryn Campbell

**From:** [Peter B](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest park  
**Date:** Sunday, November 24, 2024 10:35:57 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Please figure out a less impactful way to power intels work. Please.

Thanks  
Peter

Sent from my iPad

**From:** [Philip Holmes](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park / PGE  
**Date:** Sunday, November 24, 2024 10:36:48 PM

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Hey there,

I'm a Portland homeowner and I think PGE's plans to clear cut 20 acres of Forest Park should be curtailed.

We are lucky to have such a great urban forest in our backyard and I think we should protect it with less exceptions.

I hope you'll help enforce this perspective.

Thank you,

Philip A Holmes

**From:** [Jessica Truong](#)  
**To:** [Steele, Morgan](#)  
**Subject:** No Clear Cuts in Forest Park Public Statement  
**Date:** Sunday, November 24, 2024 10:37:43 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,  
Jessica Truong  
Portland, OR

**From:** [Katya Reyna](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Defend Forest Park  
**Date:** Sunday, November 24, 2024 10:45:49 PM

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Dear Morgan,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

-Katya Reyna, Portland resident, 97266

**From:** [Rebecca Blaj](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE plans for first park  
**Date:** Sunday, November 24, 2024 10:46:51 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I was born and raised in Portland and this park is an essential part of our city. It's part of what makes Portland unique, and we have worked hard for a long time to keep it preserved for each generation to enjoy and benefit from. I am also strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Rebecca Blaj

**From:** [Whitney Peterson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** AGAINST PGE CUTTING DOWN OUR TREES  
**Date:** Sunday, November 24, 2024 10:54:21 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Whitney Peterson  
3926 SE Lambert St, Portland, OR 97202



**From:** [Nick Shepherd](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Sunday, November 24, 2024 11:09:36 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. We must protect what few green spaces we have left.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan and put our native species at risk.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Chessa Blom  
Portland Resident

**From:** [Kyle Huber](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Defend forest park  
**Date:** Sunday, November 24, 2024 11:20:00 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sent from my iPhone

**From:** [McKayla Slattery](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comment Forest Park  
**Date:** Sunday, November 24, 2024 11:28:46 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration

**From:** [gail.stone](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** public comment against the harborton reliability project  
**Date:** Sunday, November 24, 2024 11:38:51 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration.

Gail, Portland resident and regular forest park hiker

**From:** [melody klaffke](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please deny land use permit be sought by PGE  
**Date:** Sunday, November 24, 2024 11:42:28 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

I am a lover and frequent user of forest park, as a Portland resident. Please do not allow for the mistake of creating more damage to our beautiful section of the world.

Thank you for your consideration.

Melody Klaffke

**From:** [McKenzie West](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Regarding Forest Park  
**Date:** Sunday, November 24, 2024 11:45:56 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's landuse permit.

This means the utmost importance to my family, community, portland's future generations, and myself.

Thank you for your consideration.

McKenzie

**From:** [Natalie Moser](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comment: Harborton Reliability Project  
**Date:** Monday, November 25, 2024 12:28:09 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the

"Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Sent from my iPhone

**From:** [Kyrel Bowden](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PLEASE DONT CUT THE FOREST  
**Date:** Monday, November 25, 2024 12:52:40 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.



**From:** [Eric Conner](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Do not destroy Forest Park  
**Date:** Monday, November 25, 2024 6:28:18 AM

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## **Draft Public Comment:**

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration,  
Eric Conner

**From:** [Loras email](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Defend Forest Park  
**Date:** Monday, November 25, 2024 6:52:43 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Meg Bender-Stephanski](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** PGE Permitting Comment  
**Date:** Monday, November 25, 2024 6:52:43 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric for the Harborton Reliability Project power line expansion.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. This project would also exacerbate the spread of invasive species which poses a threat to the local ecology and increases wildfire risk. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan and would be detrimental to Portland and Oregon.

Additionally, this power line expansion will not benefit Portland residents, but rather create energy infrastructure for the technology sector in Hillsboro such as the Intel expansion project. As we can see by mass layoffs, companies like Intel are not interested in creating more jobs to support the local economy.

While PGE claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from facilities such as the ones Intel is proposing. It's ironic to call moves like this climate smart when they would devastate local ecosystems.

I am strongly opposed to this project based on its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,  
Meg Bender-Stephanski

**From:** [Katherine G](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Comment on proposed PGE Clear cut of Forest Park  
**Date:** Monday, November 25, 2024 6:53:43 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration,

K. Gonzalez  
Portland resident

**From:** [Bija Young](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Urgent: Deny PGE's Land Use Permit for the Harborton Reliability Project  
**Date:** Monday, November 25, 2024 7:10:27 AM

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Dear Morgan Steele and Christine Caruso,

I am writing to emphatically oppose Portland General Electric's (PGE) proposed "Harborton Reliability Project" powerline expansion. This project is unnecessary, harmful, and prioritizes corporate interests over the well-being of Portland residents, our environment, and the local economy.

The project would require the destruction of at least five acres of forest within Forest Park, a critical urban ecosystem that provides habitat for endangered species such as the Northern Red-Legged Frog. This clear-cutting would not only destroy essential wildlife habitats but also undermine Forest Park's management goals and significantly diminish its value as a recreational and natural resource for Portland residents.

PGE claims this expansion is needed to meet increased electricity demand due to climate-smart electrification. However, their own data shows that the primary driver of this demand is not Portland residents, but the rapidly growing technology sector, including projects like Intel's expansion in Hillsboro. This project serves industrial growth while asking our community to shoulder the environmental and economic consequences.

The Harborton Reliability Project represents a short-sighted approach to infrastructure that prioritizes profit over preservation. Approving this permit would have devastating and irreparable consequences, including:

- The loss of critical forested land and ecosystems that cannot be replaced.
- The endangerment of wildlife populations already under threat.
- The undermining of Forest Park as a vital urban green space.
- A clear disregard for Portland residents in favor of corporate interests.

I urge the City of Portland Permitting and Development Department to reject this land use permit. Portland has an opportunity to stand up for its residents, its natural spaces, and the values of sustainability and community over corporate expansion.

Thank you for your attention to this matter. I strongly urge you to take decisive action to protect our city and deny PGE's permit application.

Sincerely,

Bija Young

1905 NW 29th Ave., apt 102

Portland, OR 97210



**From:** [chlotownbrown](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public Comment  
**Date:** Monday, November 25, 2024 7:32:45 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Take Care,

Chloe Marlo – A Portland Resident.

**From:** [Gil Odgers](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Protect the ecosystem of Forest Park  
**Date:** Monday, November 25, 2024 7:33:52 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

Portland has already lost so much of its iconic rainforest ecosystem to the historical legacy of colonialism and logging. Additionally, intel is currently being boycotted and protested by international human rights activists, and the expansion of resources for a company violating human rights should not come at nature's expense.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Signed,

Madeline Odgers

Lents resident and PSU graduate student



**From:** [Caitlin Warner](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment Regarding Harborton Reliability Project  
**Date:** Monday, November 25, 2024 7:44:21 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration,  
Cait Warner

**From:** [Taylor](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Portland General Electric clearcutting  
**Date:** Monday, November 25, 2024 7:51:30 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands. The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern.

Future phases of the project could disrupt salmon habitat in the Miller Creek watershed

Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in the existing clearcuts, which poses a threat to the local ecology and increases wildfire risk.

The project fails to comply with the Forest Park Natural Resources Management Plan (NRMP)

The NRMP's main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE's project is not in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project outside of Forest Park.

This project is not for supporting energy needs of local communities, as PGE claims, but for supporting large tech companies like Intel on residential ratepayers' dime.

PGE is focused on expanding transmission and energy generation infrastructure to meet the demand of rapidly growing industrial facilities, such as Intel's new \$36 billion chip-making plant in Hillsboro, which would consume roughly as much electricity as 50,000 homes.

According to PGE's schedule for load growth change, residential demand is projected to increase by only 3.5% between 2016-2025. Heavy industrial demand, on the other hand, has a projected increase of almost 150%.

PGE has repeatedly raised energy costs for ratepayers while subsidizing energy costs for large tech industry facilities in Washington County's Silicon Forest.

If this project is primarily to support Intel's expansion, then it is fueling corporate expansion, colonial extraction, and genocide.

In September 2024, the US paid Intel \$3 billion to produce microchips related to "national security" (microchips are used for various weapons systems and products of "war"). Intel's plans to build a new microchip plant in Hillsboro is part of this contract.

The US has been sending billions of dollars worth of military aid to Israel to carry out its genocide in Gaza, and Intel's plant would allow the US to send even more.

Intel is also one of Israel's largest tech employers, operating primary centers for manufacturing, research, and development there. Intel has made commitments to invest billions of dollars in Israeli companies over the next decade, and Israel awarded Intel a multi-billion dollar grant to build a microchip manufacturing plant there, similar to the one they plan to build in Hillsboro.

PGE's project, in its ties to Intel's expansion, would negatively affect and displace farm owners and workers in the area.

To prepare for the expansion of Intel and other high-tech companies in Washington County's Silicon Forest, the State of Oregon has changed land use laws to allow for corporate expansion into farmland outside Hillsboro, thus setting the stage for pushing out farmworkers in the region.

PGE claims its work will not impact sensitive species, but this is a lie. The route PGE plans to build the transmission line through is home to the red-legged frog — a federally recognized species of concern that is protected in Oregon — and some of the last remaining habitat for the red-legged frog in the region.

PGE claims their restoration plans are adequate, but the City of Portland stated in a letter that PGE's proposed restoration plan would actually take a minimum of 80 years to mature, would allow invasive species to flourish, and would fail to mitigate the long-term effects of clearing.

I hope you do the right thing.  
Taylor Patterson

**From:** [Rachel Hills](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** DEFEND FOREST PARK PUBLIC COMMENT  
**Date:** Monday, November 25, 2024 7:59:25 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Rachel Hills  
NW Portland Resident

**From:** [Marin Munos](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project  
**Date:** Monday, November 25, 2024 8:00:13 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents but rather create energy infrastructure investments for Hillsboro's rapidly expanding technology sector, including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Marin Munos (she/her)

Portland Resident

**From:** I  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Forest Park Project  
**Date:** Monday, November 25, 2024 8:00:53 AM

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Hello there,

I am a long time Portland resident residing in the Lents neighborhood. Forest Park has been to me a vital space for community and belonging, a tranquil place of peace and healing. I love that we have a forest that characterizes our city.

Our beloved forest is home to wonderful animals whose habitats have too often been destroyed by reckless development. It is a refuge amidst worsening climate conditions for humans and nonhuman beings, with our Forest Park being home to endangered species. Forest Park is also incredibly important to the health of our watershed. Unfortunately it is already facing the impacts of mismanagement and under threat of climate crisis, as storms threaten to knock down more trees every year. Clear cutting entire sections of the forest would leave the forest itself that much more vulnerable to storms.

With the ongoing crises of wildfires, heat sinks and air pollution, we need to care for our forests more and definitely not less. Urban forestry has long term social and health impacts - living in Lents it is clear that the lack of forested space has contributed to chronic illnesses such as asthma in my neighborhood and other parts of East Portland. Clear cutting also increases other types of risks long term such as with wildfires. We cannot afford to be shortsighted.

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

Please consider the long term impact of this reckless plan and deny PGE a land use permit.

Thank you,  
VT

**From:** [Andre J](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** No to PGE cutting down 20 acres of trees in forest park  
**Date:** Monday, November 25, 2024 8:16:21 AM

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To whom it may concern,

I'm writing as a Portland resident to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Andre Jaurigui

**From:** [Tove Holmberg](#)  
**Subject:** Defend Forest Park  
**Date:** Monday, November 25, 2024 8:20:35 AM

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Good morning,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

-Tove Holmberg  
Lifelong Oregonian; Portland resident since 2001



**From:** [Selena Alcantara](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park, PGE  
**Date:** Monday, November 25, 2024 8:21:07 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Erin Townsend](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Harborton Reliability Project  
**Date:** Monday, November 25, 2024 8:24:55 AM

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o whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,  
Erin Townsend  
Portland Resident of 25 years and Local Small Business Owner

[Sent from Yahoo Mail for iPhone](#)

**From:** [Lee Loeffler](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Save Forest Park. Do not allow PGE to reduce it!  
**Date:** Monday, November 25, 2024 8:53:00 AM

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To whom it may concern,

I was born here in Portland. I've lived here for 42 out of my 46 years. I love Forest Park and recognize our green space is so valuable to the city and residents in countless ways. I spent years running through Forest Park and still go hiking.

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Lee Loeffler - lifetime Portland resident and user of Forest Park

**From:** [Courtney Dowell](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect forest park from PGE!  
**Date:** Monday, November 25, 2024 9:27:20 AM

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Hi, I live off of Alberta and I'm writing to ask you to protect forest park from PGE and big companies. We need to be brave and say this space is more important than profits. The contiguous green space, the trees, the climate cooling effects, are more important than profits. We should be reducing our energy consumption in the year 2024, not increasing it. Please be brave and stand up for forest park. Please protect our future against big companies.

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Courtney Dowell

**From:** [Darby Jones](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Attn: Deny land use permit for PGE in Forest Park  
**Date:** Monday, November 25, 2024 9:32:57 AM

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To whom it may concern,

I'm writing to strongly urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

During my six years of work for Bark, local nonprofit watchdog group for Mt. Hood National Forest, and also as an outdoor school educator for youth, I witnessed firsthand the devastating impacts of clearcut and commercial logging projects on Oregon forests and natural areas. These extractive and harmful logging practices disrupt delicate ecosystems, pollute precious watersheds, and remove biodiverse and healthy forest that are critical for carbon sequestration and air filtration to offset the impacts of urban developments like the city of Portland. Logging alone is also the top contributing factor to carbon emissions in the state of OR, even above transportation. At a time of climate crisis and instability, it is critical these forests stay healthy and protected.

Furthermore, destructive logging projects compromise the viability of Portland area parks and green spaces as an economic draw for locals and tourists alike. Attractive recreation opportunities in nature are key to supporting local economies and businesses, and are far more profitable and sustainable than any temporary economic boosts these logging projects may claim they will provide.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration.

Darby L Jones  
11-years resident of Portland, 97206



**From:** [Shane Darden](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny the PGE land use permit in Forest Park  
**Date:** Monday, November 25, 2024 9:39:56 AM

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To Morgan and Christine-

I'm writing to urge Portland Permitting and Development to deny the land use permit currently sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would significantly impact Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular with Portland residents. This would eliminate the North Nasty, one of the most popular trail-running routes in Forest Park.

The project would require clearing at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts directly conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents but create energy infrastructure investments for Hillsboro's rapidly expanding technology sector, including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear from PGE's data that the vast majority of increased demand is coming from these tech facilities.

I strongly oppose this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal needs to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. I appreciate your consideration.

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**From:** [pmenco@gmail.com](mailto:pmenco@gmail.com)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Comments Against PGE's Assault on Forest Park  
**Date:** Monday, November 25, 2024 9:48:02 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. Portland is well known for being a city of trees, safe untouched outdoor space, and allowing this project to proceed would directly undermine that. The project would require the clearcutting of at least 15 acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro, including facilities like the Intel expansion project. It is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

Respectfully,  
Peter Menconeri



**From:** [Kaela Casebier](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Monday, November 25, 2024 10:02:46 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming wildlife populations, and impacting recreational areas popular to Portland residents.

I personally use Forest Park, and greatly enjoy the numerous recreation opportunities there. Allowing a project of this scope will take away from the wealth of natural resources within the city that makes Portland so special and unique. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog which is under federal protection.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro, including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

Sincerely,  
Kaela Casebier  
Portland Resident

**From:** [Spencer Heinz](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest park clear cut - public comment  
**Date:** Monday, November 25, 2024 10:43:22 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Elizabeth Lally](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project Public Comment  
**Date:** Monday, November 25, 2024 10:47:14 AM

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To whom it may concern,

I am writing you as a concerned resident of Portland and urge you to NOT sign off on PGE's proposed land use permit for Harborton Reliability Project. The project would result in acres of clear-cutting in Forest Park. Portland and the PNW are known for their natural beauty which draws in both new residents and tourists; undermining the main draw to our city for corporate profit would be both corrupt and deleterious to Portland's image (literally and politically). If you truly care about our city, you will say NO to PGE and maintain the integrity of the forests that make our state beautiful.

Thank you for your time.

Elizabeth Lally  
Portland State University  
MSW Student

**From:** [Jordie Campbell](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park  
**Date:** Monday, November 25, 2024 10:50:21 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Jordie Campbell  
Multidisciplinary Circus Artist, Dancer  
[jordienotjordan.com](http://jordienotjordan.com)

**From:** [August Medley](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Deny PGE  
**Date:** Monday, November 25, 2024 11:01:51 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Sean Belling](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project concerns  
**Date:** Monday, November 25, 2024 11:03:01 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

I personally recreate in this specific section of Forest Park weekly and have a special connection to the trails and forest there and would be greatly impacted by the proposed project.

Thank you for your consideration.

Sean Belling  
4324 NE 25th Ave, Portland, OR

**From:** [Kiersten Rossing](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment on Forest Park PGE updates  
**Date:** Monday, November 25, 2024 11:05:21 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Personally, this park and keeping the biodiversity alive in this forest is deeply important to being stewards of this land in a way that reflect active embodiment to not perpetuate the colonial harm that has already taken place on our landscapes due to capitalistic agendas. We are the living continuation of the ongoing story of this land, and it's our responsibility to step up and be in right relationship with the lands we live on.

Forest park has been a beautiful place of healing, enjoyment, and love for this city, and has been a haven for me amongst the hustle and bustle of daily life. As a young person navigating the world, having spaces like these are deeply important to protect, and let me believe in a world where nature will be around to hold me in the future.

Thank you for your consideration.

**From:** [Caty Marshall](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE clearcutting  
**Date:** Monday, November 25, 2024 11:08:33 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but elevate corporate interests in the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. We should not continue to elevate corporate interests over the public, and climate. We need every tree we can save.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Caty Marshall



**From:** [Harmony](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park from Clearcutting  
**Date:** Monday, November 25, 2024 11:09:56 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" power line expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require clearcutting of at least five acres of forest along the power line corridor, including an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Please protect our home,  
Harmony Wortham  
(*she/her/ella*)

**From:** [Bianca Marcello](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Protect Forest Park  
**Date:** Monday, November 25, 2024 11:13:23 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

As a law student, having access to Forest Park, in the state that it's currently in, is one of the best things for my mental health. I'm originally from Boston and getting to brag about having a forest in my new city is one of the best perks of living in Portland. I am deeply concerned about the plant and animal wildlife in this area. What Portland offers in terms of nature is incredibly unique, no other city in America values land in its undisturbed state like Portland does--it's the reason people move here. I am also concerned with the impact clearing trees and filling wetlands will have on water shed and water retention, especially during heavy rains.

Thank you for your consideration.

Bianca Marcello  
Portland Resident

**From:** [Lilla Fortunoff](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public Comment regarding PGE's Harborton Reliability Project  
**Date:** Monday, November 25, 2024 11:32:48 AM

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Dear Morgan Steele and Christine Caruso,

I'm writing to submit my public comment regarding the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

I'm a resident of Southwest Portland and I frequently birdwatch and hike in Forest Park. It is one of my favorite places in the area. When I first moved here, I would be asked how I'm liking Portland and my first response would be about how wonderful it is to live so close to a protected forest with beautiful, big trees, and lots of birds, animals and gorgeous ferns and other plants. When I learned that PGE was attempting to get this permit, I was confused about why they would clearcut a section of the park instead of just going around it. That seems like an incredibly easy solution that would avoid the horrible environmental impact of clearcutting a strip and filling in the streams and wetlands that are home to red-legged frogs.

I have been closely following this issue and it is extremely important to me. I was disappointed to find out that it is even being considered even though it fails to comply with the Forest Park Natural Resources Management Plan (NRMP).

I also saw that Permitting & Development is now requiring development projects to do more to prevent and mitigate erosion during the rainy season. It seems like the department cares about erosion, which I think is wonderful. The Harborton Project, even if it is completed in the "dry" season, would drastically increase erosion in the area that is cleared in Forest Park. Whatever small plants that are planted, and invasive plants find their way into that area will not provide nearly as much protection from erosion as the mature forest that is currently growing there.

Please do not let PGE move forward with this project. Please protect Forest Park and all the organisms that live there and deny the permit for the PGE Harborton Reliability Project.

Thank you,  
Lilla Fortunoff

**From:** [Teresa Sz](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PUBLIC COMMENT SUBMISSION PGE FOREST PARK  
**Date:** Monday, November 25, 2024 11:36:47 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Teresa Szczecinski  
NW portland resident and forest park lover

Sent from my iPhone

**From:** [McKenna Ritter](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public Comment on "Harborton Reliability Project"  
**Date:** Monday, November 25, 2024 11:37:01 AM

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Hello Morgan Steele,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when

looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Forest Park means a lot to me. I take my old dog for walks there at least once a week. It's a really special place for a lot of Portland residents. I also grew up playing in the woods as a kid, and it's one of the few Portland spots that brings me back to my curious childhood!

Please refuse PGE's land use permit. Thank you for your consideration.

McKenna Ritter  
Portland Resident

**From:** [Charlotte Cox](#)  
**Subject:** Fix this  
**Date:** Monday, November 25, 2024 11:41:51 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recently areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration.

Charlotte cox  
10 year resident



**From:** [Arden Crosier](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Park Clearcut  
**Date:** Monday, November 25, 2024 12:00:31 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project".

As has been previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

This project requires the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. It is my opinion as a Portland resident that Forest Park should remain untouched.

It has also been found that PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for tech companies like Intel. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Arden Crosier

**From:** [Hakim Spears](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protesting PGE's plan to clear cut Forest Park  
**Date:** Monday, November 25, 2024 12:00:53 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. As a Portland local, Forest Park is an immensely important environmental space for myself and others. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Signed,  
Hakim Spears

**From:** [jacob.dennis](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comment  
**Date:** Monday, November 25, 2024 12:02:04 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Best,  
Jacob Dennis

**From:** [alwayskiralee@gmail.com](mailto:alwayskiralee@gmail.com)  
**To:** [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project  
**Date:** Monday, November 25, 2024 12:10:05 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Kira Pierce

**From:** [Logan Burnett](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Monday, November 25, 2024 12:12:24 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Hudson Naze](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project  
**Date:** Monday, November 25, 2024 12:18:10 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan.

This development will cause irreparable harm to native ecosystems and diminish one of Portland's greatest features. If completed, the people of Portland will lose those acres and receive nothing in return.

Please refuse PGE's land use permit. Thank you for your consideration.

- Hudson N

**From:** [silas](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Powerline Expansion (Please No)  
**Date:** Monday, November 25, 2024 12:18:43 PM

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To whom it may concern,

I'm writing to STRONGLY urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

PGE's proposed project is a devastating affront to nature and to the City of Portland. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. I walk in Forest Park multiple times a week, every week and it is genuinely one of the most important parts of living in Portland for me. I feel deeply connected to the trees there and losing them would be upsetting beyond words.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. Rather than invest in tech facility expansion, why doesn't Portland Permitting and Development support clean/renewable energy projects in our city.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. I'm begging you. Thank you for your consideration.

Silas Comfortes

**From:** [August Burns](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE/Forest Park Public comment: strong opposition to PGE deforestation for power lines  
**Date:** Monday, November 25, 2024 12:20:19 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

- **If approved, this next phase of the project would clear-cut 5 acres of forest habitat** that is critical for red-legged frogs and other protected species, while paving the way for PGE to continue clear-cutting over **15 additional acres** in Forest Park.
  - This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands. The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern.
  - Future phases of the project could disrupt salmon habitat in the Miller Creek watershed



- Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in the existing clearcuts, which poses a threat to the local ecology and increases wildfire risk.

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**The project fails to comply with the Forest Park Natural Resources Management Plan (NRMP)**

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The NRMP's main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE's project is not in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project *outside* of Forest Park.

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**This project is *not* for supporting energy needs of local communities, as PGE claims, but for supporting large tech companies like Intel on residential ratepayers' dime.**

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PGE is focused on expanding transmission and energy generation infrastructure to meet the demand of rapidly growing industrial facilities, such as Intel's new \$36 billion chip-making plant in Hillsboro, which would consume [roughly as much electricity as 50,000 homes](#).

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[According to PGE's schedule for load growth change](#), residential demand is projected to increase by only 3.5% between 2016-2025. Heavy industrial demand, on the other hand, has a projected increase of almost 150%.

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PGE has repeatedly raised energy costs for ratepayers [while subsidizing energy costs for large tech industry facilities](#) in Washington County's Silicon Forest.

-

**If this project is primarily to support Intel's expansion, then it is fueling corporate expansion, colonial extraction, and genocide.**

- In September 2024, the US paid Intel \$3 billion to produce microchips related to “national security” (microchips are used for various weapons systems and products of “war”). Intel’s plans to build a new microchip plant in Hillsboro is part of this contract.
- The US has been sending billions of dollars worth of military aid to Israel to carry out its genocide in Gaza, and Intel’s plant would allow the US to send even more.
- Intel is also one of Israel’s largest tech employers, operating primary centers for manufacturing, research, and development there. Intel has made commitments to invest billions of dollars in Israeli companies over the next decade, and Israel awarded Intel a multi-billion dollar grant to build a microchip manufacturing plant there, similar to the one they plan to build in Hillsboro.

•

**PGE's project, in its ties to Intel's expansion, would negatively affect and displace farm owners and workers in the area.**

- To prepare for the expansion of Intel and other high-tech companies in Washington County's Silicon Forest, the State of Oregon has changed land use laws to allow for corporate expansion into farmland outside Hillsboro, thus setting the stage for pushing out farmworkers in the region.

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**PGE claims its work will not impact sensitive species, but this is a lie.** The route PGE plans to build the transmission line through is home to the red-legged frog — a federally recognized species of concern that is protected in Oregon — and some of the last remaining habitat for the red-legged frog in the region.

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**PGE claims their restoration plans are adequate**, but the City of Portland stated in a letter that PGE's proposed restoration plan would actually take a minimum of 80 years to mature, would allow invasive species to flourish, and would fail to mitigate the long-term effects of clearing.

Thank you for your time,  
August Burns

**From:** [Ivana](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** PGE Harborton Reliability Project  
**Date:** Monday, November 25, 2024 12:20:59 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro, including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration,  
Ivana Bosek  
Multnomah County District 2

**From:** [Rowan Spillman](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** Don't approve PGE Harborton Reliability Project  
**Date:** Monday, November 25, 2024 12:33:18 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**This is an opportunity to show if you represent the people of Portland or private interest.** Please make the right decision.

~Rowan Spillman

**From:** [Devin Ferrante](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Monday, November 25, 2024 1:00:36 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Devin Ferrante

**From:** [Syann Lunsford](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment on PGE Clear Cutting Forest Park  
**Date:** Monday, November 25, 2024 1:41:57 PM

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Hi there,

I'm writing a public comment to say that the Portland community needs you to DENY the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City as already noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. **It would be irresponsible & unprofessional to accept this permit.**

I am strongly **opposed** to this project because of the ecological and economic impacts on myself, the Northern Red Legged Frog population, and other Portland residents. PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please REFUSE PGE's land use permit. They will need to make a new proposal that is not harmful and ill-planned. This is not California, we all know that we need more care & environmental expertise when planning projects like this.

Thank you for your reading

**From:** [Elana Kanan](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park PGE Project  
**Date:** Monday, November 25, 2024 2:02:15 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Warmly,  
Elana



**From:** [jc](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park  
**Date:** Monday, November 25, 2024 2:11:03 PM

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Hello,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Thank you,  
JD Carter, Multnomah County resident

**From:** [Melanie Saunders](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Stopping PGE Clearcut  
**Date:** Monday, November 25, 2024 2:11:11 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [kpsylvan](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park and Divest from War!  
**Date:** Monday, November 25, 2024 2:21:32 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. PGE also has plans to clear-cut 15 additional acres in another phase of the project. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

If this project is primarily to support Intel's expansion, then it is fueling corporate expansion, colonial extraction, and genocide. Intel is one of Israel's largest tech employers, operating primary centers for manufacturing, research, and development there. In September 2024, the US paid Intel \$3 billion to produce microchips related to "national security" (various weapons systems and products of war). Intel's plans to build a new microchip plant in Hillsboro are part of this contract. Intel has made commitments to invest billions of dollars in Israeli companies over the next decade, and Israel awarded Intel a multi-billion dollar grant to build a microchip manufacturing plant there, similar to the one they plan to build in Hillsboro.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. I am also opposed because this project would promote violence against people in Palestine, Lebanon, Yemen, Iran, and Syria, all of whom have been increasingly subjected to U.S. and Israeli violence in the past year. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration.

Kip S

**From:** [Jane Duncan](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please Defend Forest Park  
**Date:** Monday, November 25, 2024 3:05:37 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Jane Duncan

**From:** [Megann McGill](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Forest Park PGE Land Use Permit Comment  
**Date:** Monday, November 25, 2024 3:13:18 PM

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To whom it may concern,

As a resident of Portland and a frequent hiker of Forest Park, I urge you all to preserve one of the most unique, valuable, and beautiful resources in our community. Forest Park is unlike any other space and to clear a portion of it for PGE to expand their services would put a corporate interest above that of the people in our community. Please make the best decision for Portland and Forest Park.

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE's land use permit!

Thank you for your consideration,  
Megann McGill  
Portland resident and frequent Forest Park hiker

**From:** [Ashley McKrush](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** No clear cuts in forest park  
**Date:** Monday, November 25, 2024 3:13:37 PM

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To whomever has enough power and love to stop this,

I am not in favor of PGE's plan to disturb forest park in Portland. I moved to Portland 2 years ago because it was one the only city with so much forest still in tact and nearby. This breaks my heart to hear that big cooperation with all of their money will take away something so precious to us all. This is our sanctuary here in Portland. Do the right thing and stand up for us, for nature. Tell them no.

Sincerely,

Ashley McKrush

**From:** [Jonathan Willden](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protect Forest Park  
**Date:** Monday, November 25, 2024 3:27:00 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Rosie](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE's Harborton Reliability Project Powerline Expansion in Forest Park  
**Date:** Monday, November 25, 2024 3:53:40 PM

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Hi,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

The clear cutting plan is in direct contradiction with the Forest Park Natural Resources Management Plan. Forest park is a refuge for myself, Portlanders and the many birds, frogs and wildlife that inhabit it. Preserving this land and the ecosystem as it should be prioritized above everything else.

Please refuse PGE's land use permit.

Thank you,  
Rosie Sharrard  
Portland Resident



**From:** [Lauren Beane](#)  
**To:** [Steele, Morgan](#)  
**Subject:** NO to PGE clear cutting of Forest Park  
**Date:** Monday, November 25, 2024 4:37:13 PM

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Morgan,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The NRMP’s main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE’s project is **not** in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project *outside* of Forest Park.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog - a federally recognized species of concern that is protected in Oregon - and some of the last remaining habitat for the red-legged frog in the region. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Forest Park provides accessible nature refuge from city life and is vital to what makes Portland special. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

With care,  
Lauren Beane  
*Portland resident*



**From:** [Kate Wright](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Harborton Reliability Project  
**Date:** Monday, November 25, 2024 4:43:16 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Forest park holds such a special place in the hearts of so many people. It is a no-cost place for the people of Portland to retreat from the city, it offers educational opportunities, as well as improving both my quality of life, and the other visitors. This project should not be approved.

Signed,  
Kate Wright  
707-799-0672

**From:** [Sophia Knoles](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** DEFEND FOREST PARK!  
**Date:** Monday, November 25, 2024 5:12:32 PM

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To whom it may concern,

I BEG OF YOU TO USE YOUR POWER FOR GOOD AND KEEP OREGON GREEN!

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you...

-Sophia Knoles, Instructional Assistant at Bridgeway House & Lifelong Oregon Resident

**From:** [Eleanore Warner](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Save forest park  
**Date:** Monday, November 25, 2024 5:32:22 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Eleanore Warner,  
Lifelong Portland resident

**From:** [Leah Rice](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Save forest park  
**Date:** Monday, November 25, 2024 5:40:16 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Erica Russell](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Harborton Reliability Project  
**Date:** Monday, November 25, 2024 5:59:08 PM

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Dear Portland General Electric,

I am writing to express my concerns regarding the Harborton Reliability Project and the proposed expansion of powerlines that will impact Forest Park and the surrounding area. As previously noted by the City of Portland, this project will cause significant harm to the local ecosystem, particularly Forest Park, which is a vital urban green space for both residents and wildlife.

The expansion threatens to undermine Forest Park's management goals, potentially disrupting its ecological integrity and the long-term health of its native plant and animal species. In particular, bird populations, as well as other wildlife, are at risk of displacement or harm due to the loss of critical habitats. Additionally, the recreational areas that are so valued by Portland residents would be negatively affected, diminishing the quality of public access and enjoyment of the park.

Given the importance of Forest Park as a natural resource and recreational space, I urge Portland General Electric to reconsider or seek alternative routes for the powerline expansion to avoid further environmental damage and ensure that the park's ecological and community benefits remain intact.

I appreciate your attention to these concerns and hope that you will take them into account as the project moves forward.

Sincerely,  
Erica Russell  
Tigard, OR

**From:** [Ben Hassey](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Monday, November 25, 2024 6:02:09 PM

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To whom it may concern,

Writing this as a Forest Park Ambassador and Guided Hike leader who has worked with the Forest Park Conservancy for 4 years.

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Ben Hassey  
Portland, OR Taxpayer and Resident  
Cully Neighborhood



**From:** [laura burton](#)  
**To:** [Steele, Morgan](#)  
**Date:** Monday, November 25, 2024 6:11:48 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

-Laura Burton, Portland Resident

**From:** [Linda Austin](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park and PGE  
**Date:** Monday, November 25, 2024 6:16:01 PM

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To whom it may concern,

As a PGE ratepayer, concerned citizen, and lover of Forest Park, I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

**Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.** While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Best,  
Linda Austin  
4625 SE 67th Ave.  
Portland, OR 97206

**From:** [Enrico SolRiso](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Deforestation  
**Date:** Monday, November 25, 2024 6:21:23 PM

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To whom it may concern, I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please REFUSE PGE's land use permit. Thank you for your consideration.

**From:** [Jacob Penderworth](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment on PGE Forest Park clear cutting  
**Date:** Monday, November 25, 2024 6:29:22 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. As someone who spends nearly every weekend in Forest Park and also volunteers with the Conservancy to maintain trails and the habitat, this is very concerning.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for reading this and listening.

- Jacob

**From:** [Grey Davila](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest park clearcutting  
**Date:** Monday, November 25, 2024 6:31:55 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Thank you,  
A Portland resident

**From:** [Zoe Larsen](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** SAVE FOREST PARK  
**Date:** Monday, November 25, 2024 6:35:18 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Zoe Larsen  
Portland Resident

**From:** [Katie White Swanson](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please deny land use permit to PGE  
**Date:** Monday, November 25, 2024 6:37:39 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sent from my iPhone

**From:** [Elizabeth Kennedy](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park Public Comment  
**Date:** Monday, November 25, 2024 6:37:54 PM

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To whom it may concern,

The Harborton Reliability Project proposed by Portland General Electric (PGE) threatens to irreparably harm one of Portland's most cherished natural spaces—Forest Park. I urge Portland Permitting and Development to deny PGE's land use permit for this project. While I support investment in advanced manufacturing, infrastructure, and clean energy, this project's lack of transparency and failure to meaningfully involve stakeholders raise serious concerns that cannot be ignored.

As the City has already noted, the Harborton Reliability Project would cause significant impacts to Forest Park and its surrounding ecosystem, undermining its management goals, harming bird and wildlife populations, and disrupting recreational areas relied upon by Portland residents. The project would require clearcutting at least five acres of forest, including critical habitat for the imperiled Northern Red-Legged Frog, a clear violation of the Forest Park Natural Resource Management Plan.

PGE claims this powerline expansion is necessary to meet growing electricity demand from climate-smart electrification, but their own data indicates otherwise. This project primarily serves the rapidly expanding tech sector in Hillsboro, including facilities like the Intel



expansion project. The project offers little to no benefit for Portland residents while saddling us with long-term ecological damage.

Furthermore, this process has lacked transparency and meaningful public involvement. Organizations like the Forest Park Conservancy, Bird Alliance of Oregon, and neighbors in the project area deserved a proper seat at the table. Without a thorough, transparent assessment of the project's ecological impacts and genuine opportunities for public input, PGE's application should not move forward.

I strongly urge you to deny this land use permit. Forest Park's ecological health, wildlife, and recreational value must not be sacrificed without accountability and proper public consultation. Thank you for your attention to this urgent matter.

**From:** [Alyssa Kim](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Land Use  
**Date:** Monday, November 25, 2024 7:07:10 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration,  
Alyssa, lifelong Portland resident

**From:** [Tess k](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Monday, November 25, 2024 7:13:55 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Tess Krivens

**From:** [Priscilla C](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Letter from a concerned resident: please protect Forest Park!  
**Date:** Monday, November 25, 2024 7:27:39 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,  
Priscilla C.

Portland, OR resident of 25 years  
Oregon Health & Science University student

**From:** [Randall Mello](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project  
**Date:** Monday, November 25, 2024 7:29:49 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Randall Mello, PharmD, MS, BCPPS

**From:** [Nissa Jensen](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Stop PGE's Harborton Reliability Project & Defend Forest Park  
**Date:** Monday, November 25, 2024 7:32:10 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Thank you,

N Jensen

Portland resident since 1999 who loves hiking in Forest Park

**From:** [Monica Silvestri](#)  
**Subject:** Public Comment on PGE's Project  
**Date:** Monday, November 25, 2024 7:48:17 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

thank you,  
Monica Silvestri  
Portland Resident

**From:** [Nicole "Bonnie" Williams](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposed to Harborton Reliability Project powerline expansion  
**Date:** Monday, November 25, 2024 7:51:39 PM

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To whom it may concern,

My name is Nicole Williams and I've been a volunteer with the Harborton Frog Shuttle for seven years. I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog that hundreds of people are working to protect each winter through our frog shuttle efforts. In addition these impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Best,  
Nicole Williams

--  
Nicole Williams aka Bonnie Thunders  
she/they  
Co-Owner, [Five Stride Skate Shop](#)  
Skater, [Rose City Rollers](#)  
Saving Oceans at [Ocean Outcomes](#)



**From:** [Deanna Rizzo](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Red legged tree frog protection  
**Date:** Monday, November 25, 2024 8:07:21 PM

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As a member of the Harborton Frog Shuttle volunteer, I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Thank you,  
Deanna Rizzo

**From:** [James Panther](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: Yall need a hyperlink  
**Date:** Monday, November 25, 2024 8:19:23 PM

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Sure. Here's my comment,

Clearcutting anything in Forest Park for any reason is unconscionable to me. Forest park is one of the most precious resources of any city in this country, and we need it preserved for the sake of all the animals and plants that live there. We also need it to be preserved for the mental health and well-being of Portlanders and people who come to visit the city. Portland has become over congested, and the need for nature within city limits is stronger than it's ever been. Clearcutting is 100% not what Portland stands for. The development of our city has gone too far, and I stand with all Portlanders who oppose this measure.

On Mon, Nov 25, 2024 at 1:29 PM Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)> wrote:

Hi James,

That is not the official City of Portland Instagram account. You should message them directly with your concerns/suggestions over the hyperlink. If you want to submit an official comment regarding the proposed development, I will include it in the record.

Best,

**Morgan Steele**  
Senior Environmental Planner

Land Use Services, Environmental/Land Division Team

**City of Portland – Portland Permitting and Development**

[1900 SW Fourth Avenue, Suite 5000](#)  
[Portland, OR 97201](#)

503-865-6437 (cell)

[morgan.steele@portlandoregon.gov](mailto:morgan.steele@portlandoregon.gov)

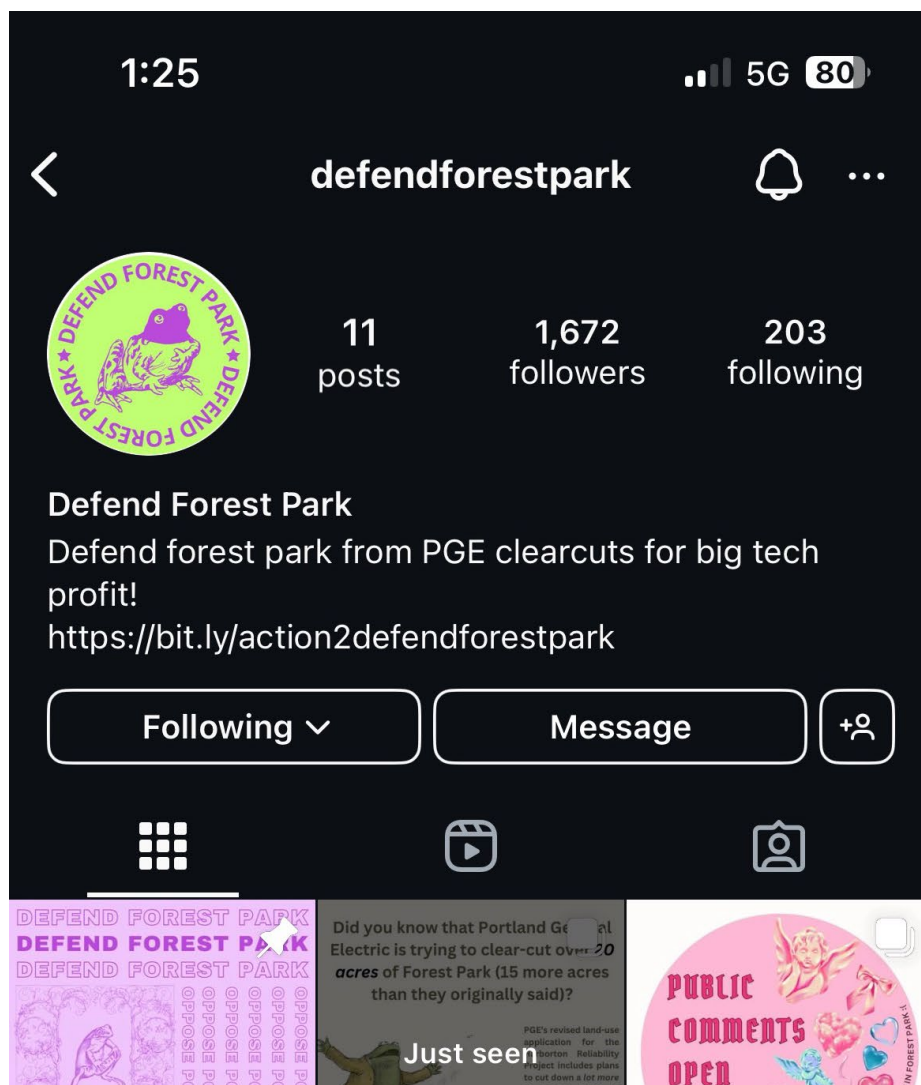
[www.portland.gov/ppd](http://www.portland.gov/ppd)

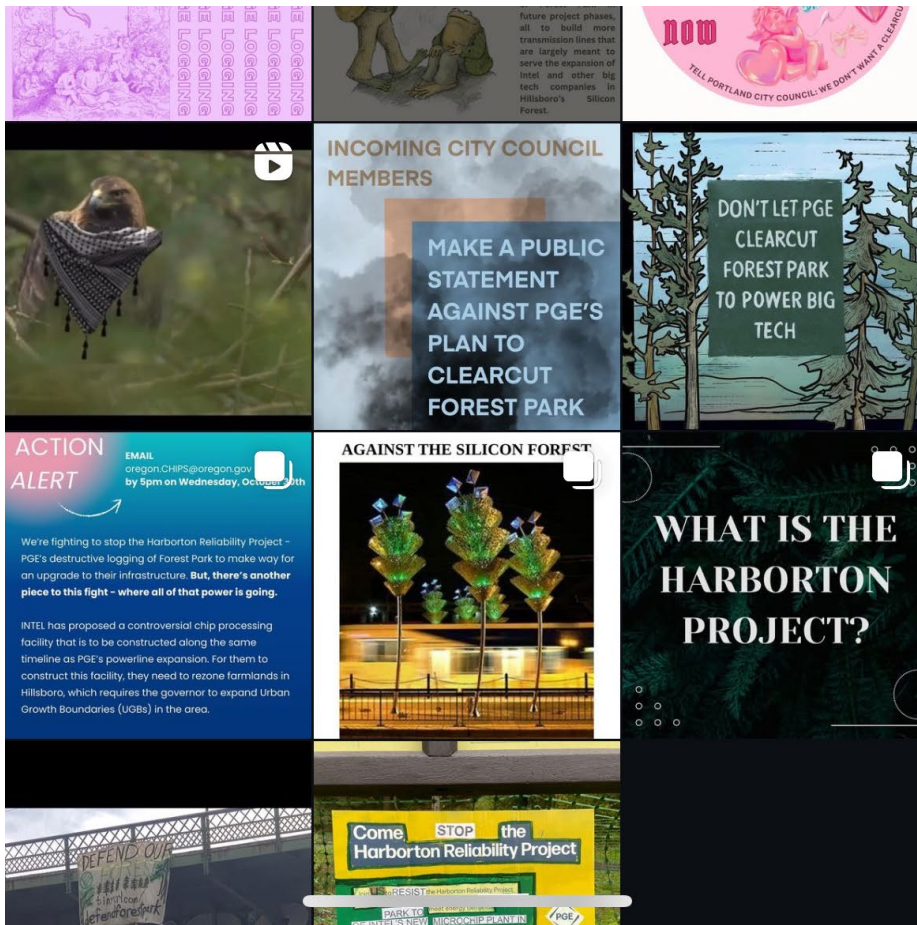
Work Hours: Monday-Friday 7:00-3:30 PT

The City of Portland ensures meaningful access to City programs, services, and activities to comply with Civil Rights Title VI and ADA Title II laws and reasonably provides: translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids and services. Request these services [online](#) or call 503-823-4000, Relay Service: 711.

503-823-4000 Traducción e Interpretación | Biên Dịch và Thông Dịch | 口笔译服务 | Устный и письменный перевод | Turjumaad iyo Fasiraad | Письмовий і усний переклад | Traducere și interpretariat | Chiaku me Awewen Kapas | अनुवादन तथा व्याख्या

**From:** James Panther <[jamespantherastrology@gmail.com](mailto:jamespantherastrology@gmail.com)>  
**Sent:** Monday, November 25, 2024 10:26 AM  
**To:** Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)>  
**Subject:** Re: Yall need a hyperlink





On Mon, Nov 25, 2024 at 12:32 PM Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)> wrote:

Hi James,

Thank you for your comment. Was the Instagram post you are referring to an official City of Portland Instagram account? If so, can you please provide me the Instagram handle?

Best,

**Morgan Steele**

Senior Environmental Planner

Land Use Services, Environmental/Land Division Team

## City of Portland – Portland Permitting and Development

[1900 SW Fourth Avenue, Suite 5000](#)  
[Portland, OR 97201](#)

503-865-6437 (cell)

[morgan.steele@portlandoregon.gov](mailto:morgan.steele@portlandoregon.gov)

[www.portland.gov/ppd](http://www.portland.gov/ppd)

Work Hours: Monday-Friday 7:00-3:30 PT

The City of Portland ensures meaningful access to City programs, services, and activities to comply with Civil Rights Title VI and ADA Title II laws and reasonably provides: translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids and services. Request these services [online](#) or call 503-823-4000, Relay Service: 711.

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Устный и письменный перевод | Turjumaad iyo Fasiraad | Письмовий і усний  
переклад | Traducere și interpretariat | Chiaku me Awewen Kapas | अनुवादन तथा  
व्याख्या

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**From:** James Panther <[jamespantherastrology@gmail.com](mailto:jamespantherastrology@gmail.com)>

**Sent:** Monday, November 25, 2024 9:30 AM

**To:** Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)>; Caruso, Christine  
<[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)>

**Subject:** Yall need a hyperlink

Hey, I am responding to the Instagram post about the potential Devastation in Forest Park. On your Instagram bio, It would be great if there was a hyperlink so people casually scrolling through can quickly click and do what's being asked to take action.

Realistically people are busy and are overstimulated anyway, not to mention lazy, and I really feel like I want to have this be a no-brainer and very easy to take action. Would you please make a hyperlink for your Instagram bio where you have been making these very important posts? It should be super simple for people weigh in.

Also, after taking the time to type out the link that you wrote out, it didn't even work in my browser.

This is coming from a place of love and wanting to support the cause, don't get me wrong! Link tree is really easy to set up and throw in a hyperlink.

I will be sharing this post nonetheless. Thanks for your service!

**From:** [Hannah Rosenau](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** deny land use by PGE "Harborton Reliability Project"  
**Date:** Monday, November 25, 2024 8:22:56 PM

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Hello! I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration of our collective future!

**From:** [SofBrice Supfas](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment to strongly oppose PGE's Forest Park clearcut  
**Date:** Monday, November 25, 2024 8:25:35 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.



**From:** [Jason Hawkins](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment on Harborton Reliability Project Land Use Permit  
**Date:** Monday, November 25, 2024 8:38:49 PM

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To whom it may concern:

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming wildlife populations, and impacting recreational areas dear to many Portland residents, including myself.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts do not comply with the Forest Park Natural Resource Management Plan. PGE has not satisfied me that they have fully explored other options, based on the contents of the recently-released Toth and Associates report.

Additionally, I am skeptical that PGE's power line expansion will benefit Portland area residents. PGE's own data shows that the likely motivation is to create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro, including facilities like the Intel expansion project.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration,  
Jason Hawkins

**From:** [Kesiah](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE clearcut  
**Date:** Monday, November 25, 2024 9:04:00 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Gabrielle Kraft](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment  
**Date:** Monday, November 25, 2024 9:25:27 PM

---

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Gabrielle Kraft  
Portland resident

**From:** [allirm77@gmail.com](mailto:allirm77@gmail.com)  
**To:** [Steele, Morgan](#)  
**Subject:** Public Comment  
**Date:** Monday, November 25, 2024 9:31:27 PM

---

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Alli Miller

**From:** [Ella Riis](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please do not allow PGE project  
**Date:** Monday, November 25, 2024 9:57:19 PM

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I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

I've lived here my whole life. It would be a fracture to my identity to see this forest defaced.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Ryder Booth](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Deny the land use permit for PGE  
**Date:** Monday, November 25, 2024 10:41:36 PM

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To whom it may concern,

You have likely heard everyone's side and concerns about the project. So I won't restate them.

Please deny this permit. Once PGE clear-cuts this land we will NEVER get it back.

Thanks,  
Ryder  
North West / Montgomery Park resident

**From:** [Joy Damiani](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny PGE land use permit for Harborton Reliability Project  
**Date:** Monday, November 25, 2024 11:27:25 PM

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I am writing as a Portland resident, a disabled veteran, and a regular walker in Forest Park, to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Joy Damiani

**From:** [Aletha W](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Tuesday, November 26, 2024 12:11:21 AM

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I would like to express my dissent for logging in Forest Park. Forest Park provides critical green-space and wildlife corridors in a landscape heavily altered already by urbanization. Portland residents and sensitive habitats and wildlife should not pay the price for Intel and other industries to profit. Force them to get creative, if they need more power they need to produce it on sight through green technology, or source it from the south or west where it doesn't cut through existing canopy. There is PLENTY of space in Hillsboro and Beaverton for them to build solar panels over every parking lot and warehouse, Fred Meyer and Costco. They do not need our forest.

Aletha W



**From:** [Andrew Rhodes](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE should NOT clearcut Forest Park  
**Date:** Tuesday, November 26, 2024 6:04:41 AM

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Dear Morgan,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Andrew Rhodes  
(619) 823-2211  
[2andrewrhodes@gmail.com](mailto:2andrewrhodes@gmail.com)  
- sent from my smart fridge

**From:** [Matt Sanchez](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park PGE tree removal, Harborton  
**Date:** Tuesday, November 26, 2024 6:10:06 AM

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Hello,

The City of Portland is one that champions itself on its urban forest density, diversity and sustainability. When I learned that PGE and the City had come up with a plan to remove several trees through a wooded corridor to feed energy towards the valley I became frustrated because this would undermine the forest that this city relies upon for countless reasons including but not limited to ecosystem services, wildlife, and recreation. This occurrence at the same time that urban forestry passed the amendment to secure large trees seems like a misstep in an intended right direction.

As a consulting arborist I realize that alternatives are probably slim and more expensive than this approach. However, I urge the City of Portland to explore alternatives with the intention of respect to the trees and the downstream benefits they provide to the climate, wildlife, and people.

Thank you,

Matt Sanchez  
ISA Certified Arborist  
Madison South Neighborhood

**From:** [Olivia Yee](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Deny PGE's land use permit for Forest Park  
**Date:** Tuesday, November 26, 2024 8:17:47 AM

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I am a Portland born and raised resident writing you to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Forest Park is a place for humans and animals alike to seek refuge in the beauty of nature. If PGE gets permission for their plan, animals like the red-legged frog would be at risk for extinction. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Ravikumar Gohel](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park and PGE  
**Date:** Tuesday, November 26, 2024 8:54:59 AM

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Hello All,

Hi all, I implore you to watch this following documentary on clear cutting and the negative effects it has on the environment and the people who live in that environment.

[https://youtu.be/tl2RFcvTuqQ?si=ZDdatV5OxqPOptV\\_](https://youtu.be/tl2RFcvTuqQ?si=ZDdatV5OxqPOptV_)

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

A resident of Portland and a neighbor of Forest Park,  
Ravikumar Gohel

**From:** [Chandra Ashford](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please deny the land use permit for PGE  
**Date:** Tuesday, November 26, 2024 9:00:23 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**Chandra Noble-Ashford** **Think Real Estate**

**Licensed Principal Broker in Oregon**

Pronouns : she / her

[\(503\) 933-6538](#) | [Social Media](#) | [Our Site](#) | [Book Appointment](#)



**From:** [Michaela Kascak](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park letter  
**Date:** Tuesday, November 26, 2024 9:36:36 AM

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To Whom It May Concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I lived nestled on 30 untouched acres of Forest Park last winter and saw so many beautiful birds, frogs, families of deer, heard coyotes, saw a bob cat... its home to so many animals and plants and trees and fungi. The misty forest in the winter gives solace from the overcast city and some areas get coated with snow often as they are higher in elevation creating even more beauty. As someone who has struggled with mental health, as many do in Portland, having an easy escape from the loud and busy city is a saving grace for me. Here, I found more Reishi mushrooms than anywhere else I have looked, which is a powerful remedy for mental health support, immune support and vitality. I pushed through my fear of hiking alone to explore the trails of Forest Park. This is a gem. An escape from the urban sprawl. It needs to remain that way. Too much has been lost. We can’t afford to lose more. With weather conditions changing, the ice storm of last winter and the way this disturbed roots of trees and uprooted many- clearing acres and 300+ trees will exacerbate this pattern, leading to more deforestation, landslides, loss of habitats for more animals and plants, losing them too. And the list goes on...

Aside from these concerns, to my understanding this plan would disturb the habitat of red legged frogs, which are federally considered as a concerned species and will have a cascade affect of other wild animals in Forest Park that rely on them for food including snakes, raccoons, foxes, coyotes, bobcats and more which make up the wild population of Forest Park.

Furthermore, destroying these habitats also prevents native plant species from growing and allows more invasive plant species to take over which further threatens animals habitats and leads to great risk of wildfire.

These are concerns for nature and wildlife but what of the people of this area? There are many

small farms that will be affected. This also has a cascade effect.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Elsie Stevens](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Defend Forest park: Public comment  
**Date:** Tuesday, November 26, 2024 9:42:39 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

- Elsie Stevens



**From:** [Janus Houchen-Haun](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE expansion comment  
**Date:** Tuesday, November 26, 2024 10:13:12 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Janus Houchen-Haun  
Portland, District 3

**From:** [Zack Bauer](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** RE: Opposition to PGE's Harborton Reliability Project  
**Date:** Tuesday, November 26, 2024 10:25:00 AM

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Dear Portland Permitting and Development,

I am writing to express my strong opposition to Portland General Electric's (PGE) land use permit application for the Harborton Reliability Project powerline expansion. This project would have severe consequences for Forest Park and its ecosystem, undermining the park's management goals, harming wildlife such as birds and the Northern Red-Legged Frog, and affecting recreational spaces cherished by Portland residents.

The proposed project involves clearing at least five acres of forest along the powerline corridor, including areas critical to endangered species. These actions contradict the Forest Park Natural Resource Management Plan and would cause lasting ecological damage.

Additionally, this powerline expansion does not serve Portland residents but instead supports the growing technology sector in Hillsboro, including developments like Intel's expansion. While PGE cites increasing electricity demand due to climate-conscious electrification, their data shows the majority of this demand stems from tech facilities rather than local residents.

For these reasons, I urge you to deny PGE's permit application. The project is harmful, unnecessary, and incompatible with Forest Park's established resource management guidelines. Thank you for considering this matter.

Sincerely,  
Zack Bauer  
Portland Resident

On Nov 25, 2024 at 19:55 -0800, Zack Bauer <[zlbauer14@gmail.com](mailto:zlbauer14@gmail.com)>, wrote:

|



**From:** [b.mcc](#)  
**To:** [Steele, Morgan](#)  
**Subject:** public comment on PGE expansion in Forest Park  
**Date:** Tuesday, November 26, 2024 10:28:09 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Brian McCauley

Portland resident, and lover of Forest Park

**From:** [CS](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Save Forrest Park  
**Date:** Tuesday, November 26, 2024 10:45:06 AM

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Hi Morgan,

I'm sure I don't need to convince you that Forest Park should be preserved in all efforts.

This is my official comment in opposition of the PGE Project to clear tress in Forest Park, the beautiful emerald gem of our city.

Thanks for your time.

-Caylie Seeger

**From:** [John Barnaby](#)  
**To:** [Steele, Morgan](#)  
**Date:** Tuesday, November 26, 2024 10:48:51 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Love, peace & chicken grease  
~ John barnaby

**From:** [ROBERT J GRAY](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Tuesday, November 26, 2024 11:08:59 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Regards  
Rob Gray  
Assistant Scoutmaster  
Troop 855  
503-310-3161

**From:** [Sawyer VanVactor-Lee](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** DENY Harborton Reliability Project!  
**Date:** Tuesday, November 26, 2024 11:28:33 AM

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Hello,

My name is Sawyer. I'm a resident of Portland Oregon (97211 zip code) and I am writing today to plead that you DENY the land use permit currently sought out by PGE for the Harborton Reliability Project power line expansion.

This project would absolutely destroy FIVE ACRES of wildlife. Which not only is devastating to our natural habitats and the animals that live there- but would be devastating to the hundreds of Portland residents that visit that area for leisure and pleasure (myself included!).

With so many climate disasters happening all over the country I am truly shocked and appalled that something so obviously devastating to the environment is even being considered.

I urge you to think about the lasting impacts of this decision and to do what is right for Portland residents today, and in the future.

Thank you for your consideration,

--

Sawyer VanVactor-Lee (they/he)



**From:** [Sarah Meadows](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park Sale- Public Comment  
**Date:** Tuesday, November 26, 2024 11:34:35 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Allison Riegel](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Forest Park expansion  
**Date:** Tuesday, November 26, 2024 12:01:22 PM

---

Hello Morgan,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Allison Riegel  
(Portland resident for 11 years + behavioral health provider)



**From:** [Carey Vosler](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE permit  
**Date:** Tuesday, November 26, 2024 12:01:30 PM

---

Hi Morgan!

I'm writing to encourage Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. I trail run in Forest Park several times a week, it's a top destination for me to take visitors, and I hike there every Monday morning with a good friend of mine. Forest Park is a sanctuary and home for me.

My understanding is that this project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. It would mean a lot if you refused PGE's land use permit. Thank you for your consideration.

Sincerely,

Carey Vosler

**From:** [Kailey Rondo](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please do not clear any of Forest Park  
**Date:** Tuesday, November 26, 2024 12:08:57 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Signed, Kailey Rondo  
Lover of Forest Park and Portland Communities

**From:** [Heather](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend forest park  
**Date:** Tuesday, November 26, 2024 12:31:09 PM

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My name is Heather Thomas,

As a native Oregonian, I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

This park is an attraction for visitors and this land is important for the future for the surviving non-human life.

Thank you for your consideration.

Heather Thomas  
[hillsoheather@gmail.com](mailto:hillsoheather@gmail.com)  
503.309.2138

7820 SW Hunziker Rd  
Apt 410  
Tigard, OR 97223

**From:** [Talitha May](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Tuesday, November 26, 2024 12:56:27 PM

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November 26, 2024

Dear Morgan Steele,

I am writing to share my concerns about PGE's proposal to develop inside Forest Park and ask you to please reject PGE's proposal. When I first moved to Portland, I was awestruck about the beauty of the Park. After having lived in Ohio and even Austin, Texas, for over twenty years, I was shocked about how Portlanders have free access to such an ecologically thriving park. What little parks Austin does have, for example, is generally privatized—anyone who has never visited Forest Park would find this treasure enviable. For the first time in my life, I saw owls, pileated woodpeckers, rabbits, and so much more. I am amazed how Forest Park is home to over 117 bird species and fifty-three species of mammals (Marcy Cottrell Houle, *One City's Wilderness*, 56)—this is their home that we responsibly share.

As the years have passed, the forest has taught me so much. Rather than just seeing a landscape of beautiful Douglas firs, big-leaved maples, and sword ferns, I began to see and understand the complexity and uniqueness of Forest Park's ecology that not only helps animals, but humans as well—the park is a unique, national gem.

PGE's proposal to develop inside Forest Park is irresponsible on many levels. The proposal fails to meet most of the development criteria in the Forest Park Natural Resource Management plan:

1. For one, the proposal contradicts the plan, which supports the forest in becoming an old-growth forest. PGE's plan to cut down mature trees and replace them with saplings does little to advance an old-growth forest.
2. Secondly, PGE has conducted an analysis that shows that several alternative locations outside of Forest Park exist to update the power grid without damaging Forest Park. I attended a PGE meeting at Linton, and they specifically told us that no alternatives exist, but alternatives do. I recall attendees asking questions and offering alternatives, but PGE was steadfast in their misleading position.
3. Finally, approving PGE's project could create the precedent for future development in the park, which would further contradict the management plan. At the PGE meeting, PGE indicated that increasing energy needs would arise in the future. This multiphase project will set the precedent for more cut trees, stream degradation, and habitat loss.

PGE's proposal conflicts with Forest Park's management plan, and PGE has not been forthright to the public about alternative locations to update the power grid. PGE's alternatives offer a sustainable solution for both Forest Park and future human needs.

With kind regards,  
Talitha May

**From:** [Joy Payne](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Please Save Forest Park  
**Date:** Tuesday, November 26, 2024 1:07:18 PM

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Hello there,

My name is Joy and I've been living in Oregon my whole life. One of the best parts of Portland is Forest Park. Preserving what nature we have left in this city is of the utmost importance. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Portland resident,

Joy



**From:** [Kimberly Johnson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Don't Let PGE Cut Away at Our Beautiful Park  
**Date:** Tuesday, November 26, 2024 1:20:58 PM

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Hi,

My name is Kimberly Johnson, and I am a Portland resident. I live in Northwest Portland, just blocks away from Forest Park. I walk nearly daily in the park, and am saddened to hear that PGE is proposing to clearcut a section of our beautiful park. Forest Park is one of the best parts of this city, and I am heartbroken at the thought that our city would start divvying it up to private companies and putting our incredible ecosystem at risk in the process. I hope that you will consider this message in assessing the land use permit being sought by PGE. Please **do not** approve this permit.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Best,  
Kimberly Johnson

**From:** [Jeremy Smith](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project Opposition  
**Date:** Tuesday, November 26, 2024 1:26:01 PM

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Hello Morgan and Christine,

My name is Jeremy Smith. I am a home owner living in Lair Hill/Caruthers Addition and a frequent user of Forest Park.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration,

Jeremy

**From:** [Annie Murrell](#)  
**To:** [Steele, Morgan](#)  
**Date:** Tuesday, November 26, 2024 1:28:42 PM

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Dear Morgan Steele,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Annie Murrell

**From:** [Janie Lowe](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please spare the chipping away of Forest Park  
**Date:** Tuesday, November 26, 2024 1:37:13 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.  
Thank you,  
Janie Lowe

**From:** [Isaac yoder](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park preservation  
**Date:** Tuesday, November 26, 2024 2:01:00 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

For the people, and the planet,  
Isaac yoder

**From:** [James Winkler](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, November 26, 2024 2:03:02 PM

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I am writing I am writing in protest of of PGE's proposal to clear cut a 5 acre parcel in Forest Park.

**PGE has proposed to develop transmission lines expanding a quarter mile west of the Harborton substation. This would require clearing the forest in an approximately five-acre swath of Forest Park, where PGE has a utility easement on land owned by the City of Portland and managed by Portland Parks & Recreation. While five acres may not seem like a lot, the loss of the forest there would severely impact the habitat, hurting broader ecosystem health in an otherwise healthy second-growth forest parcel. The area is rich in biological diversity and is important upland habitat for red-legged frogs, a sensitive species in Oregon. In fact, the **Harborton Frog Crossing**, where volunteers gather annually to ferry frogs across the highway, is just around the corner.**

**Forest Park is a special place for us Portlanders, and a much needed getaway while living in the city that can't seem to contain: open drug use, people having sex and shitting on the streets, gun violence, people living in dumpsters and sidewalks while the rest of us pay our bills and taxes, raise families and slave away for the man for most our adult lives. Forest Park is basically the only gem we have left, as the city government has lost all control over anything else.**

**Additionally, tell PGE to go fuck themselves. They can find more expensive ways to do this since they continue to increase rates on Oregonians. For example, they could bore transmission lines underground, running along highway 30, without destroying any ecosystem. This might slow traffic down a little bit, but who really gives a shit about that?**

**Okay, now please go do the right thing.**

**James Winkler  
Portland**

**From:** [Celeste Hellyer](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park  
**Date:** Tuesday, November 26, 2024 2:07:35 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

We have one of the last rainforests in the world. The world is facing a climate disaster. We should be doing everything in our power to protect the few natural spaces left to us. So many of these trees are older than any of us. They are older than the companies trying to cut them down. Forest Park is a beautiful place and makes the natural world accessible to Portland residents. Please don't let them chip away at it. Please let the value of life be more than profit. Intel and PGE are doing just fine right now without this project, and they will continue to be just fine without cutting down trees older than anybody alive right now.

Thank you for your consideration.

Sincerely,  
Saffy Hellyer

**From:** [Jamie Olds](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, November 26, 2024 2:13:21 PM

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Hi Morgan,

PGE's proposal to develop within Forest Park is deeply concerning. It directly violates the Forest Park Natural Resources Management Plan, which prioritizes supporting old-growth forest development. Additionally, PGE's own analysis shows viable alternatives outside the park. Approving this project sets a dangerous precedent for future development, leading to further habitat loss and environmental degradation.

Forest Park and old growth forests are irreplaceable—please reject PGE's proposal to preserve its ecological and cultural value for future generations.

Thank you for fighting for the trees!  
Jamie Olds



**From:** [Olivia](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please deny a land use permit to Portland General Electric (PGE)  
**Date:** Tuesday, November 26, 2024 2:14:16 PM

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Please deny a land use permit to Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. This would harm our Forest Park ecosystem, impact recreation areas, and put imperiled species like the Northern Red Legged Frog in more danger, contrary to the Forest Park Natural Resource Management Plan. The expansion is not intended to and will not benefit Portland residents, but rather corporate interests

Please refuse PGE’s land use permit. Thank you for your consideration.

Olivia Buscho  
Attorney and member of the Oregon State Bar

--

Olivia Buscho  
*she/they*

**From:** [Marissa Dagenais](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project Public Comment  
**Date:** Tuesday, November 26, 2024 2:55:03 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. I've lived in Beaverton my whole life. I've hiked in Forest Park since I was just a kid. My husband and I got engaged on a hike in Forest Park, and I can't support any project where the forest would be cut down, especially not for the sole benefit of a corporation. I work in eminent domain and right of way, so I understand the benefits of public improvement projects and understand that sometimes, people's property has to be sacrificed for the greater good of the community. In this case though, I strongly reject that this is for "public improvement" or for the "greater good".

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Marissa Arnett, Broker  
Licensed in the state of Oregon  
503-593-5106

**From:** [Anna Van Dingstee](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park  
**Date:** Tuesday, November 26, 2024 2:55:48 PM

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To Whom it May Concern-

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Anna Van Dingstee, Portland Resident

**From:** [Kit Adams](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment re: Forest Park  
**Date:** Tuesday, November 26, 2024 3:22:27 PM

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Deny the land use permit being sought by PGE for the "Harborton Reliability Project!" Leave Forest Park alone!!

-Kit Adams, lifetime Multnomah County Resident

**From:** [Madelin Peterson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend forest park!  
**Date:** Tuesday, November 26, 2024 4:27:59 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

The one thing my partner and I loved about Oregon when moving from California was its beautiful forests, refuges and large amount of trees and conservation work.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents.

Please refuse PGE's land use permit.

**From:** [Kelly Feldman](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Forest Clearcut Public Comment  
**Date:** Tuesday, November 26, 2024 5:39:46 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” power-line expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Putting so many plants and animals lives at risk for the sake of steamrolling forward with human development is abhorrent and should have been stopped a long, long time ago.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. The fact that they are parading this new project as something that will “help” in coming increased weather changes is hilarious considering that the previous development of projects like this are the reason we are struggling with the climate crisis in the first place. We need a complete overhaul in our infrastructure to prepare for the future impacts of the climate crisis, not just continued work on the what is in place and actively harming the environment already.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Kelly Feldman, Portland Resident

**From:** [Alison Lockfeld](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please refuse PGEs land use permit to clearcut in Forest Park  
**Date:** Tuesday, November 26, 2024 5:50:13 PM

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Hello,

I am emailing to ask you to deny the land use permit to PGE for the "Harborton Reliability Project" powerline expansion. I strongly believe that we have a responsibility to protect our trees and the ecological systems and PGEs clearcutting of our beloved park will do more harm to our environment and our community. Please refuse PGE's land use permit.

Thank you for your consideration.

Alison Lockfeld  
Portland resident in 97213

**From:** [Jere Grimm](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU 24 04 1109 CU EN GW  
**Date:** Tuesday, November 26, 2024 5:55:50 PM

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Since our family moved to Portland in 1956, we have lived at the edge of Forest Park, and through the years our growing family of six children wove their lives in and out of  
of those treasured trails, branches. sentinel towering beings; relatives whose breath give us life. They exhale what we inhale.

MY husband's ashes lie there; mine will join his, and with certainty, my children's as well.

And PGE blithely speaks of clearcutting 5 acres!!

in a world that is on fire, burning from our misuse, PGE proposes to misuse again.

We say, "NO". Thou Shalt Not!

Not five acres, not five square foot.

Our House is On Fire.

Every standing breathing tree helps us. Every day our small planet loses eighty thousand trees a day. ENOUGH!

The FOREST PARK NATURAL RESOURCES MANAGEMENT PLAN states that the two main goals are 1) to manage for old growth and 2) to protect forests for educational and recreational usage.

PGE's proposed use is a direct violation of these goals.

Reject the proposal.

Thank you,

Jere M Grimm



**From:** [qwilson@earthlink.net](mailto:qwilson@earthlink.net)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Corporatized Forest Park Destruction  
**Date:** Tuesday, November 26, 2024 6:13:07 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for for your consideration.

Quentin Wilson  
4117 N Lombard St,  
Portland, OR 97203

**From:** [Anne Heimlich](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, November 26, 2024 6:23:47 PM

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Dear Morgan Steele,

Many years ago I lived in a small dark house on NW Thurman Street and I worked long hours as a manager of Food Front Cooperative Grocery. I discovered how easy it was to escape into Forest Park and renew my energy and spirit. Later on I taught at Chapman School and took many students on field trips into Forest Park to study first hand the old-growth forest habitat which provides a sanctuary for wildlife. I helped them learn how its trees clean our air, filter our water, and cool our city. Although I now live across the Wilamette River, I visit Forest Park often. It is still a place where I can breathe deeply and remember that I'm part of the natural world too. Having a place like Forest Park so close to our city and easily accessible to many people is a rare privilege and we need to recognize how valuable a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, which would result in more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,

Anne Heimlich

**From:** [Francie Royce](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Forest Park Conservancy](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Tuesday, November 26, 2024 6:48:01 PM

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I'm writing about the PGE proposal to run power lines through the northern section of Forest Park, Portland's gem of publicly owned parkland within the City boundary.

The proposal is contrary to the Forest Park Plan. The northern section is the area reserved to be the least touched. Not even large walking or running events are contrary to the plan.

I urge a denial of the PGE proposal.

Francie Royce  
503 803 7936

"The sublime is with us in every season, if we only pause long enough to take it in."---Dana Milbank

**From:** [F. Robin Burgess](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny the Harborton Reliability Project expansion permit  
**Date:** Tuesday, November 26, 2024 6:56:13 PM

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My name is Robin Burgess, I'm a lifelong resident of Portland, and I am writing to urge Portland Permitting and Development to deny PGE's land use permit request for their "Harborton Reliability Project" power line expansion. I am concerned for the impact that this project will have on Forest Park and the surrounding areas, and I do not believe that this project will bring about any meaningful benefit to Portland's residents that would justify the damage to our most valuable ecosystems.

Forest Park has always been a bit special to me. When I was young, my school took cohorts of middle and high school students to Forest Park to tend to the environment by pulling up the noxious and invasive English Ivy that constantly threatens to suffocate native plants and trees around edge habitats on the west side of town. As I grew older, I came to appreciate Forest Park's value as a refuge from the otherwise depressing urban sprawl and ivy-choked disturbed areas in the Northwest district and downtown. It's one of the places I like to take my friends from out of town when the sun is out.

The "Harborton Reliability Project" expansion would require the clearcutting of at least five acres of forest in this treasured place, including in an area that provides a crucial habitat for the Northern Red Legged Frog, which is listed by the state as a sensitive species and by the federal government as a species of concern. This expansion also threatens to exacerbate the spread of invasive species present in the existing clearcuts, including the English Ivy my preteen hands made a concerted effort to keep under control in the park. This threatens to turn the area into another ivy-choked wasteland and increases wildfire risk.

Moreover, while PGE argues that the project will support the energy needs of local communities, it's clear from looking at PGE's data that the growing electricity demand they're attempting to meet does not come from residential ratepayers looking to electrify, but from resource-hungry tech companies looking to expand their facilities, such as Intel's new planned \$36 billion chip plant in Hillsboro, which would consume about as much electricity as 50,000 homes and release millions of tons of greenhouse gasses, sulfur dioxide, carbon monoxide, and other hazardous emissions into the surrounding ecosystem.

This trend of prioritizing big tech is not new for PGE, which has spent the past three years rapidly raising its rates for residential customers-- 30% since December 2022-- while subsidizing energy costs for resource-hungry and environmentally destructive data centers in Washington County. I have friends in Washington County whose families have already suffered from the displacement and pollution that these data centers have brought with them as far back as the 1980s, and this new plan threatens to displace farm workers and introduce even more pollutants.

The project proposal also fails to comply with the Forest Park Natural Resources Management Plan, and the City of Portland has already pointed out PGE's failures to account for this damage in their propped "restoration plans". I cannot stress enough how dangerous this project would be for Portland residents both ecologically and economically. You cannot allow PGE to enable these big tech companies to wreak any more environmental havoc than they already have-- please refuse this land permit.

Thank you,  
Robin Burgess

**From:** [Judy H](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, November 26, 2024 6:56:54 PM

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Dear Morgan Steele:

Forest Park is a unique and wonderful asset to the City of Portland. I go there to hike with friends and with the Metro Movers senior walking program. These hikes are important to help me stay active in my late 70s and to socialize and feel a part of nature.

I am very concerned that PGE's proposed project is an illegal violation of the major goals of the park's forest management plan, to protect and enhance the park and to grow ancient forest. In addition, this project would create a precedent for future destruction of habitat and industrial development inside the park.

Please reject this project and require PGE to implement one of their alternative plans. Thank you.

Sincerely,

Judy Henderson  
2541 SW Miles St  
Portland 97219

**From:** [Tai Faux](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Tuesday, November 26, 2024 7:00:09 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sent from my iPhone

**From:** [Christina Sweringen](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Save Forest Park  
**Date:** Tuesday, November 26, 2024 7:47:09 PM

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Hey y'all,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

P.S. To be perfectly candid, this is bullshit and please don't let it happen. It's depressing. I live in Salem now but I've spent many hours at that park and it's such an amazing and unique feature of the area. It's beautiful to have so much well established habitat anywhere, but especially so near to the city. I see trees being cut down and habitat demolished everywhere. Forest Park should be safe from that kind of ruin. I literally cried thinking about it and as I'm writing this message. Please don't let them do it.

Thanks muchly,  
Christina Sweringen



**From:** [Adam Weber](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park PGE Land Use Public Comment  
**Date:** Tuesday, November 26, 2024 8:05:53 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Regards,  
Adam Weber

Portland Resident & Homeowner  
845-800-8425

**From:** [Sonali Sampat](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** My Personal Request to Stop the Harborton Reliability Project  
**Date:** Tuesday, November 26, 2024 8:24:14 PM

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Hello Morgan Steele & Christine Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Sonali Sampat  
Portland Resident

**From:** [Miel Bredouw](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Begging you to refuse PGE's land use permit  
**Date:** Tuesday, November 26, 2024 8:30:35 PM

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Hi, my name is Miel Bredouw, I live in SE Portland and I am writing to beg Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan.

**PLEASE** refuse PGE's land use permit. The world is already falling apart. We don't need to make it any worse. Thank you.

Miel

**From:** [Marina Peloquin](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public Comment: Harborton Reliability Project  
**Date:** Tuesday, November 26, 2024 8:39:03 PM

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Dear Morgan Steele,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in the existing clearcuts, which poses a threat to the local ecology and increases wildfire risk.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are **directly in conflict** with the Forest Park Natural Resource Management Plan (NRMP). The NRMP’s main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE’s project is not in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project *outside* of Forest Park.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Marina  
Hillsboro, OR resident

**From:** [sophiagfarmer](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Tuesday, November 26, 2024 8:45:41 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [marjorie.nafziger@gmail.com](mailto:marjorie.nafziger@gmail.com)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Tuesday, November 26, 2024 8:52:13 PM

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Dear Morgan Steele,

When I first moved to Portland 10 years ago one of the first things that struck me was how intertwined the city and nature are. I could be downtown, surrounded by skyscrapers, and then drive 5 minutes and be in old-growth forest. Forest Park is an incredibly special place, for so many reasons. It has given my family and me many hours of hiking pleasure. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal.

Sincerely~  
Marjorie Nafziger

Sent from my iPad

**From:** [Elliott Dutcher](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Concerns with PGE Harborton Reliability Project  
**Date:** Tuesday, November 26, 2024 9:14:43 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely Portland Resident,  
Elliott Dutcher

**From:** [Erica Iannitti](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Harborton reliability project  
**Date:** Tuesday, November 26, 2024 9:15:54 PM

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Hello,

I implore you to reject PGE's latest proposal to raze forest park. It is outrageous and unconscionable.

Kind regards,

Erica Iannitti



**From:** [Kathryn Prater](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** NO to Harborton Reliability Project  
**Date:** Tuesday, November 26, 2024 9:45:01 PM

---

Hello -

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Kathryn, Portland resident

**From:** [Tania Neubauer](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, November 26, 2024 10:21:14 PM

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Dear Morgan Steele,

I am writing to state the city must reject PGE's proposed clearcut in Forest Park. Forest Park is a rare and precious jewel unique in any city in the world and we must protect it. I live near the park and am often awakened at night by the calls of owls hunting. I know that the red-legged frogs, a species of concern in our region, stand to be impacted by PGE's plan. Just outside my door are rare plants that must not be destroyed by logging. The place that PGE proposes to log contains very old trees and this project will do harm that PGE cannot remedy.

First of all, PGE's plan is against the city's Forest Park Natural Resources Management Plan, which states the city's goal is to help the forest become an old growth forest. For this reason alone, even without considering any of the rest, the city is required to reject this plan.

Second, PGE studied many options for this line, some of which are viable, such as the Marina Way option, without causing this harm. The current proposal would lock PGE into logging another 15 acres which they disingenuously did not include in this proposal.

Third, PGE is categorically unable to mitigate the harm caused by this clearcut. The city's rules say they must mitigate damage in the north unit of the forest, but PGE does not propose to do this... perhaps because they can't.

Fourth, this project is really about profit for PGE, by creating more capacity for transmission from the Harborton Substation, which coincidentally (unmentioned in this application) is the proposed destination of a hundred mile line to be buried in the Columbia River and reaching from the Dalles to Harborton. PGE is engaging in dishonest subterfuge by not disclosing their full plan.

Fifth, PGE arbitrarily decided not to colocate the line on the existing BPA Road line, and has not provided any evidence that they couldn't locate their line where the existing powerline/clearcut in the park is already in effect.

For all these reasons, the city must reject PGE's proposed clearcut in Forest Park and stick to its plan for the Park: "grow an ancient forest for the benefit and enjoyment of future generations."

Don't be remembered as the one who let this happen to our city's jewel on your watch.

Sincerely,  
Tania Neubauer

**From:** [Aubrey Cooley](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Concern for PGE's Land Use Permit  
**Date:** Tuesday, November 26, 2024 10:40:07 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its due to its ecological and economic impacts on myself and other Portland residents. Please REFUSE PGE's land use permit. Thank you for your consideration.

Aubrey Cooley

**From:** [Sally Wall](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Oppose clearcutting  
**Date:** Tuesday, November 26, 2024 10:59:43 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Kindly,  
Sally

**From:** [Jeremy Hogeweide](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment  
**Date:** Tuesday, November 26, 2024 11:45:11 PM

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Good morning,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you,  
-Jeremy

**From:** [Sonny Cong](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park Now and Forever  
**Date:** Wednesday, November 27, 2024 1:19:53 AM

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To whom it may concern, I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. Forest Park is a defining feature of Portland, cherished by residents and visitors alike. Its preservation is vital to the city's identity, history, and environmental health. Losing any part of it would deeply impact our community and future generations. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Nickohlas Skinner](#)  
**To:** [Steele, Morgan](#)  
**Subject:** No to Cutting Forest Park  
**Date:** Wednesday, November 27, 2024 5:53:22 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Nickohlas Skinner,  
Portland resident and Parks Employee

**From:** [Polly Bilchuk](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment on PGE forest park power line expansion  
**Date:** Wednesday, November 27, 2024 7:36:38 AM

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To whom it may concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Polly Bilchuk



**From:** [Susie Livingstone](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [kchin@birdallianceoregon.org](mailto:kchin@birdallianceoregon.org)  
**Subject:** Forest Park: LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 7:39:57 AM

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Dear Morgan Steele,

When I first moved to Portland I wasn't planning on staying here. But then I went for a hike in Forest Park & fell in love. I was so excited to have an amazing place to hike, recharge & enjoy just outside my door that I ended up staying here. I love that no matter where I go in Portland or Vancouver I can see the park.

PGE's proposal to develop inside Forest Park is appalling to me on so many levels. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan:

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal and would leave a scar on the park for years to come and be visible for miles. Just take a ride out to the coast on 26. So sad.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss.

I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people who live and visit here, the city, and for future generations.

Sincerely,

Susie Livingstone

**From:** [Victoria Phillips](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Deny PGE, protect Forest Park  
**Date:** Wednesday, November 27, 2024 8:09:58 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

If approved, this next phase of the project would clear-cut 5 acres of forest habitat that is critical for red-legged frogs and other protected species, while paving the way for PGE to continue clear-cutting over 15 additional acres in Forest Park.

This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands. The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern.

Future phases of the project could disrupt salmon habitat in the Miller Creek watershed

Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in the existing clearcuts, which poses a threat to the local ecology and increases wildfire risk.

The project fails to comply with the Forest Park Natural Resources Management Plan (NRMP)

The NRMP’s main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE’s project is not in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project outside of Forest Park.

This project is not for supporting energy needs of local communities, as PGE claims, but for supporting large tech companies like Intel on residential ratepayers' dime.

PGE is focused on expanding transmission and energy generation infrastructure to meet the demand of rapidly growing industrial facilities, such as Intel's new \$36 billion chip-making plant in Hillsboro, which would consume roughly as much electricity as 50,000 homes.

According to PGE's schedule for load growth change, residential demand is projected to increase by only 3.5% between 2016-2025. Heavy industrial demand, on the other hand, has a projected increase of almost 150%.

PGE has repeatedly raised energy costs for ratepayers while subsidizing energy costs for large tech industry facilities in Washington County's Silicon Forest.

If this project is primarily to support Intel's expansion, then it is fueling corporate expansion, colonial extraction, and genocide.

In September 2024, the US paid Intel \$3 billion to produce microchips related to "national security" (microchips are used for various weapons systems and products of "war"). Intel's plans to build a new microchip plant in Hillsboro is part of this contract.

The US has been sending billions of dollars worth of military aid to Israel to carry out its genocide in Gaza, and Intel's plant would allow the US to send even more.

Intel is also one of Israel's largest tech employers, operating primary centers for manufacturing, research, and development there. Intel has made commitments to invest billions of dollars in Israeli companies over the next decade, and Israel awarded Intel a multi-billion dollar grant to build a microchip manufacturing plant there, similar to the one they plan to build in Hillsboro.

PGE's project, in its ties to Intel's expansion, would negatively affect and displace farm owners and workers in the area.

To prepare for the expansion of Intel and other high-tech companies in Washington County's Silicon Forest, the State of Oregon has changed land use laws to allow for corporate expansion into farmland outside Hillsboro, thus setting the stage for pushing out farmworkers in the region.

PGE claims its work will not impact sensitive species, but this is a lie. The route PGE plans to build the transmission line through is home to the red-legged frog — a federally recognized species of concern that is protected in Oregon — and some of the last remaining habitat for the red-legged frog in the region.

PGE claims their restoration plans are adequate, but the City of Portland stated in a letter that PGE's proposed restoration plan would actually take a minimum of 80 years to mature, would allow invasive species to flourish, and would fail to mitigate the long-term effects of clearing.

Finally, I would like to say that as a person who was born and raised in Portland, the destruction of forest park would be devastating, for me, on a personal level. Years of my childhood were spent on hikes, enjoying the nature and beauty of life in forest park. PGE's project would not only be detrimental to wildlife, nature and our climate... it will also impact the lives of hundreds of people who love, support and have wonderful memories in Forest Park.

So, again, I respectfully request that you do your part in stopping the destruction of this priceless, precious land by denying the land use permit currently being sought out by Portland General Electric (PGE).

Thank you,  
Victoria Phillips

**From:** [Olivia Leigh Nowak](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Please don't cut forest grove  
**Date:** Wednesday, November 27, 2024 8:17:23 AM

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Hello, I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

This place is so precious to me, I've seen endangered owls in this forest, some that I have completely gone extinct in British Columbia (where I lived before Portland). There's incredible habitat there. We are fighting so many fights in America, why do we need to fight this one. Please let us have this, we're about to go into a climate crisis garbage fire with our new president, having more trees will be crucial. For climate but most importantly for our mental health! Cutting these trees will harm not only the eco system, and the wild life but also parts of ourselves.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Thank you for reading  
Olivia Leigh Nowak

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**Olivia Leigh Nowak**  
Founder of Le Colibri Studio  
[www.lecolibri.studio](http://www.lecolibri.studio)

**From:** [breasal@comcast.net](mailto:breasal@comcast.net)  
**To:** [Steele, Morgan](#)  
**Subject:** LU24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 8:33:16 AM

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I'm writing to let you know I am opposed to this plan to allow PGE's plan for Forest Park.

Forest Park should be inviolate. As there are other areas for PGE to use for this plan I think they are using a perception of necessity to save money and time, because browbeating a city commission is easier then getting permissions from private landowners who would be involved in the other areas under consideration.

Please do not let this plan be approved.

Young residents of Portland have been left this astonishing miracle of nature within city limits, and I for one wish to leave this to them.

Thank you,

Patti Martin

6966 N. Knowles Ave., 97217

**From:** [Aby Henry](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Deny land use permit for forest park  
**Date:** Wednesday, November 27, 2024 8:52:55 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Aby Henry

[www.bridgetownsparrow.com](http://www.bridgetownsparrow.com)  
[www.abymhenry.com](http://www.abymhenry.com)

**From:** [Bailey Sauter](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Harborton Reliability Project OPPOSITION  
**Date:** Wednesday, November 27, 2024 8:57:59 AM

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Morgan and Christine,

I think anyone would agree that Forest Park is one of the most unique and special parts of Portland. It is not, however, a resource that can be replenished once it's destroyed. I (along with many other Portland residents) use Forest Park weekly to access nature from within our city, a city that is already short on green spaces.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. This is absolutely unacceptable to me.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your time,  
Bailey Sauter  
Portland Resident



**From:** [jimi hendrix](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** Please don't let PGE clear cut Forest Park!  
**Date:** Wednesday, November 27, 2024 9:09:32 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Best,

Jimi

--

VIA MOBILE ▪ JIMI HENDRIX ▪ 812-320-8008 ▪ BROKER ▪ LICENSED IN  
OREGON ▪ [JIMIHENDRIXISAREALTOR.COM](https://www.jimihendrixisarealtor.com)

**From:** [Nora Mattek](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 9:21:58 AM

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Dear Morgan,

PGE's proposal is concerning. Please reject PGE's proposal.

PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.

PGE's Alternatives Analysis shows there are several possible locations outside Forest Park.

Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park

Thank you for listening,  
Nora Polk

**From:** [Kyle Rhodes](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE's "Harborton Reliability Project"  
**Date:** Wednesday, November 27, 2024 9:28:57 AM

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To Whom it May Concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

We need the trees. We need every bit of their CO2 sequestering ability as we face the climate crisis. Portland has long been a city that has led by example for revering and protecting green space. I know you will make the right decision for our future.

Thank you for your consideration,

Kyle Rhodes  
Oregon voter  
Portland resident 2012-2019

**From:** [J. White](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, November 27, 2024 9:30:29 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Jacqueline White  
SE Portland Resident

**From:** [Daisy Nolz](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Stop Portland General Electric from clear cutting Forest Park  
**Date:** Wednesday, November 27, 2024 9:43:39 AM

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Good Morning,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Daisy Nolz  
Oregon Resident

**From:** [Laurel Buckley](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** We don't want a clear cut in Forest Park  
**Date:** Wednesday, November 27, 2024 9:50:06 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harbor Reliability Project" powerline expansion. As the City previously noted, the Harbor Reliability project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

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Laurel Buckley

**From:** [Gretchen Hinderliter](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Wednesday, November 27, 2024 9:54:39 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

- Gretchen

**From:** [Jordan Di Nocenzo](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defending Forest Park - Public Comment  
**Date:** Wednesday, November 27, 2024 10:09:04 AM

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Hello, my name is Jordan J. Di Nocenzo, and I am a local Portland resident!

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

I endorse this message 10 fold, and so on to infinity. Please don't let PGE rape our forests for profit incentive.

Sincerely,  
Jordan Di Nocenzo



**From:** [John Griffiths](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Clearcutting Permits Inside of Forest Park  
**Date:** Wednesday, November 27, 2024 10:20:10 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration,

John Griffiths

**From:** [Chris Enlow](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 10:22:37 AM

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Hi Morgan,

My name is Chris Enlow. I am reaching out about the PGE project.

I live in NE Portland and have been an active user of Forest Park for nearly two decades. Furthermore, I have first-hand experience supporting the Park's efforts in alignment with the Forest Park Natural Resources Management Plan (NRMP) as a former Forest Park Conservancy board member. One thing that I am very proud of is during my time at KEEN Footwear, we funded their effort to evolve from Friends of Forest Park to become the Forest Park Conservancy. It's moments like the current issue with PGE's project that organizations like FPC are so critically important as we consider the future of our community.

At a fundamental level, the PGE project blatantly ignores many of the core principles of the Forest Park Natural Resources Management Plan. PGE's proposal to develop inside Forest Park is concerning on many levels, and it is critical that the City considers the following 3 points. Let me explain:

1. **Contradicting Forest Park's goal to become an old-growth forest**
  - The top priority of the management plan is to support the forest's evolution into an old-growth ecosystem. PGE's proposal to cut down mature trees and replace them with saplings undermines this goal entirely.
2. **Alternative locations already identified**
  - PGE's own analysis has shown that viable alternative locations outside of Forest Park exist. Updating the power grid can—and should—be done without impacting this critical natural area.
3. **The risk of setting a dangerous precedent**
  - Approving this project opens the door for more development within Forest Park, as PGE has already indicated this is just the first phase of a larger plan. Future expansions would lead to further tree loss, habitat degradation, and harm to the park's ecosystems. This proposal would normalize development in a place that should remain untouched.

Forest Park is more than just trees—it's a legacy. It's a gift we inherit and must pass on, intact, to future generations. Allowing this development would cause irreversible ecological and cultural damage. For the sake of the wildlife, the trees, the people of Portland, and the generations to come, I urge you to reject PGE's proposal.

Sincerely your,

Chris

--

Chris Enlow | he/him/his | (503) 805-9962 | [LinkedIn](#) | [Instagram](#)



**From:** [C. Sauter](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Forest Park Power Line Expansion  
**Date:** Wednesday, November 27, 2024 10:32:22 AM

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Dear Morgan Steele and Christine Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Casey Sauter  
Portland Resident

**From:** [Debra Clemans](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Cc:** [Debra Clemans](#)  
**Subject:** Forest Park  
**Date:** Wednesday, November 27, 2024 10:40:45 AM

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Greetings,

Today I'm writing to urge Portland Permitting and Development to **deny** the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Debra Clemans  
4049 N. Haight Ave, 97227

**From:** [Lauren Goché](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public comment are open for PGE's forest park clearcut  
**Date:** Wednesday, November 27, 2024 11:04:50 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

**Lauren Goché**

**Think Real Estate**

principal broker - licensed in Oregon  
212 SE 18th Ave, Portland, OR 97214  
(503) 679.3748  
she/her  
[www.laurengoché.com](http://www.laurengoché.com)

**[A review is always appreciated!](#)**

**[Oregon Disclosed Limited Agency Pamphlet](#)**

**BE AWARE! WIRE FRAUD IS ON THE RISE. ALWAYS VERIFY** by calling the originator of the email using previously known contact Information prior to sending funds.

**\*\*I will never send an email with wire transfer instructions \*\***

**From:** [Harold Rosenberg](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 11:16:50 AM

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Dear Morgan Steele,

I am writing to express my opposition to PGE's plan to remove trees from Forest Park. As someone who has walked in Forest Park at least several times each week for the past 9 years, I have come to appreciate the special nature of the Park -- in every season and for many reasons.

Although I appreciate the need for electricity services, especially in light of the press of housing growth to the west of the Park, I do not think those needs overshadow the virtues of cutting trees in Forest Park to make way for PGE's proposal.

Based on what I've read in The Oregonian and conservation newsletters, it is clear that PGE's proposal is in opposition to a key provision of the Forest Park Natural Resources Management Plan, which is to build an old growth forest. Furthermore, it appears there are other locations OUTSIDE Forest Park where PGE could undertake such a project. In addition, I am concerned about setting a precedent for future phases of PGE's project and for other development projects within the Park.

Therefore, may I kindly request that we keep Forest Park intact and unharmed by PGE's proposal.

Sincerely,

Harold Rosenberg  
15446 NW Tee Ct  
Portland, OR 97229

**From:** [Olivia Reynolds](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forrest Park Comments  
**Date:** Wednesday, November 27, 2024 11:31:08 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Olivia Reynolds  
S Portland Resident

Sent from my iPhone



**From:** [Hunter](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public Comment on PGE's Forest Park Project  
**Date:** Wednesday, November 27, 2024 11:39:14 AM

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To whom it may concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

I was born and raised in the Willamette Valley and have experienced first hand the impacts of deforestation and diminishing natural areas. Over my lifetime, I watched a quarter of our state's tree cover be lost (Global Forest Watch Data) and the decline of our Salmon population, also correlated to the impact of energy systems. It was quite a message to send to a youth to see our state's inability to prevent the depletion of our state's basic natural foundation. I have respiratory symptoms at the young age of 23 from Oregon's volatile air quality from the mismanagement of fire-prone forests, agricultural sprawl, and declining tree cover. I urge you to take a strong stance.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

Please refuse PGE's land use permit. Thank you for your consideration.

Hunter Calvert  
Crisis Counselor & Horticulturalist

**From:** [Sherowski](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** We dont want a clear cut in Forest Park  
**Date:** Wednesday, November 27, 2024 12:20:33 PM

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**To whom it may concern,**

**I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.**

**The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.**

**Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.**

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.**

Jennifer

**From:** [Haley Burrill](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Clear cut in forest park  
**Date:** Wednesday, November 27, 2024 12:45:32 PM

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To whole it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

I am strongly opposed to this project due to the ecological and economic impacts on myself and Portland residents as a whole. Please refuse PGE's land use permit.

Thank you for your time and consideration,  
Haley

**From:** [dare](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Date:** Wednesday, November 27, 2024 12:47:50 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

We must resist Corporate Tech’s wanton destruction of the natural environment and the bizarre, dystopian urge to turn the earth into a technofeudalist wasteland.

Darius Sohei  
Portland Resident

**From:** [Riley Lindsay](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: Portland General Electric's Harborton Reliability Project  
**Date:** Wednesday, November 27, 2024 12:52:28 PM

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Hello,

My name is Riley Lindsay.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Here are some additional reasons why I do not support this plan.

**The project fails to comply with the Forest Park Natural Resources Management Plan (NRMP)**

The NRMP's main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE's project is not in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project *outside* of Forest Park.

**PGE claims its work will not impact sensitive species, but this is a lie.**

The route PGE plans to build the transmission line through is home to the red-legged frog — a federally recognized species of concern that is protected in Oregon — and some of the last remaining habitat for the red-legged frog in the region.

**PGE claims their restoration plans are adequate**, but the City of Portland stated in a letter that PGE's proposed restoration plan would actually take a minimum of 80 years to mature, would allow invasive species to flourish, and would fail to mitigate the long-term effects of clearing.

**If this project is primarily to support Intel's expansion, then it is fueling corporate expansion, colonial extraction, and genocide.**

In September 2024, the US paid Intel \$3 billion to produce microchips related to "national security" (microchips are used for various weapons systems and products of "war"). Intel's plans to build a new microchip plant in Hillsboro is part of this contract.

The US has been sending billions of dollars worth of military aid to Israel to carry out its genocide in Gaza, and Intel's plant would allow the US to send even more.

Intel is also one of Israel's largest tech employers, operating primary centers for manufacturing, research, and development there. Intel has made commitments to invest billions of dollars in Israeli companies over the next decade, and Israel awarded Intel a multi-billion dollar grant to build a microchip manufacturing plant there, similar to the one they plan to build in Hillsboro.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

-Riley Lindsay

**From:** [Lynn Fendler](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** PGE permit to destroy more trees  
**Date:** Wednesday, November 27, 2024 1:02:51 PM

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Dear M Caruso and M Steele,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant harm to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and affecting recreational areas popular to Portland residents. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on me and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

One tree on my Portland property died and had to be taken down. For that I was required to plant a remediation tree. Would PGE be required to plant remediation trees if they destroy several acres of forest?

Thank you for considering my position and for protecting Oregon’s trees.

Sincerely,  
Lynn Fendler

*May all sentient beings be free from needless suffering.* Immeasurable



**From:** [Ethan Bear](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public letter- PGE Destroying Forest Park  
**Date:** Wednesday, November 27, 2024 1:33:05 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Ethan Bear

**From:** [Jocelyn Asis](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Concern for Forest Park  
**Date:** Wednesday, November 27, 2024 2:05:17 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

As a member of the Portland Community, Forest Park is an integral part of the culture and beauty of Portland that needs to be protected for future generations to continue to enjoy.

Sent from my iPhone

**From:** [Whitney R. Maxfield](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comment  
**Date:** Wednesday, November 27, 2024 2:09:28 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
A future conservationist  
Whitney Maxfield (she/her)

**From:** [Elora Arding](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 2:14:56 PM

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Dear Morgan Steele,

As a resident of Portland, one of the things I value most about our city is the proximity to nature—and Forest Park is the crown jewel of my connection. This vast, vibrant green space is not just a retreat for people but also a thriving ecosystem that cleans our air, protects wildlife, and helps combat the effects of urbanization. To me, Forest Park is a place of reflection, a reminder of the balance we must strike between development and preservation, which is why I am deeply concerned about PGE's proposal to develop within the park. It threatens the forest's health and contradicts the principles that govern its management.

The Forest Park Natural Resources Management Plan (NRMP) emphasizes growing the forest into old growth but cutting down mature trees for this project would counter act that vision and undermines decades of conservation work.

If there are viable alternative locations outside of Forest Park for this project (which PGE's own analysis confirms), why can't PGE move forward with an alternative location, as to avoid disrupting this critical ecosystem?

Lastly, approving this project sets a dangerous precedent- PGE's plan is part of a larger, multiphase development, meaning this initial disruption could pave the way for more extensive damage in the future. Allowing this project could open Forest Park to further degradation and increased human encroachment.

Forest Park isn't just a piece of land; it's a symbol of Portland's values and a vital resource for both the environment and the community. Once it's harmed, the damage will be irreparable. I urge you to reject PGE's proposal and safeguard Forest Park for current and future generations.

Thank you for taking the time to review my comments and for your role in protecting this essential part of our city.

Sincerely,

Elora Arding

3207 SE 85th Avenue, Portland 97266

[elora.arding@gmail.com](mailto:elora.arding@gmail.com)

**From:** [Elise Kathryn](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Portlans Resident  
**Date:** Wednesday, November 27, 2024 2:19:12 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Portland Resident

**From:** [Lauren Sullivan](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Deny the Land Use Permit for PGE's "Harborton Reliability Project"  
**Date:** Wednesday, November 27, 2024 2:29:36 PM

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Hello,

I am asking Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Especially at this moment in history, we need to preserve, and better yet, regenerate our existing wildlife, not continue chipping away at what little wildlife areas are left. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Jesse Weeg](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Defend Forest Park - Deny Harborton Reliability Project  
**Date:** Wednesday, November 27, 2024 3:33:02 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As a Portland resident, we must be protecting our natural spaces. Forest Park provides crucial habitat for so much wildlife and is an important part of Portland's outdoor culture. And as we move towards more climate instability, protecting these natural spaces is even more critical, instead of clearcutting them.

Also, this project is not to the benefit of Portland residents, but rather the rapidly expanding technology sector in Hillsboro. Forest Park is for all of us, we shouldn't be sacrificing it in order to help grow private corporations.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration,  
Jesse Weeg  
SE Portland

**From:** [carrie.morton](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment : STOP PGE from clear cutting forest park  
**Date:** Wednesday, November 27, 2024 4:11:50 PM

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To whom it may concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

Forest Park is a treasure to Portlanders, and a sanctuary to wildlife. We must protect our green spaces for future generations and find alternatives for our power needs.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Carrie Morton  
Portland resident 97211



**From:** [Al Lehto](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Say NO to PGE Land Use Permit  
**Date:** Wednesday, November 27, 2024 4:29:10 PM

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My name is Allen Lehto, I am a Portland resident and a supporter of protecting wildlife in the Portland Metro area. As a volunteer with OPB who has done extensive research into the history of the parks and riparian areas in Portland Oregon, i have a vested interest in having these spaces continue to be protected and cherished by the local government. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Tri Sanger](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protecting Forest Park  
**Date:** Wednesday, November 27, 2024 4:47:53 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. Forest Park is a crucial part of Portland's identity as a forest city, and contributes to the well being of resident humans and wildlife. It is a place to hike, to explore, to participate in habitat restoration, NOT to clear cut.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

It is imperative that at this point in the climate crisis that we do everything we can to halt biodiversity loss. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally by cutting established trees we would be removing a vital carbon sequestration resource. Planting new trees in another area is not as useful in this regard as young trees take in only a third of the amount of carbon as mature trees. We need every tree to be protected in order to keep Portland green, and Portland's air clean.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Tri Sanger,  
Concerned Portland resident and teacher

**From:** [Kate Kauffman](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 5:22:14 PM

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Dear Morgan:

My name is Kate Kauffman, and I am the lead technician for Backyard Habitat. Our program's focus is to build wildlife corridors and habitat sanctuaries throughout the four metro counties in order to support wildlife and pollinators, restore native vegetation, mitigate the region's stormwater challenges, and reduce the toxic impact of pesticides upon our ecosystem. Forest Park is a keystone ecosystem of our work in West Portland and Washington County. Compromising wildlife and habitat there has reaching impact to our 12,000 participants, who are concerned to know PGE may be able to alter this landscape.

Our urban area's historical leaders had the foresight to protect natural areas throughout the region as they watched humans make costly and destructive decisions as the area developed. Forest park was an early area that was protected from development, and for very important reasons. On a recent tour of Bull Run and the multicounty drinking water systems, we learned that the **aquifer under the Columbia Slough area that is our backup water system is directly fed from runoff at the base of the West Hills, of which Forest Park is a significant portion. Keeping mature trees, canopy cover, and robust understory mitigates erosion and runoff, which is good for our drinking water, city streets, residents, and wildlife.**

**The proposed development of Forest Park by PGE directly compromises our city's health, as well as defies the FPRFM's main priority which is to encourage the forest towards old growth status. 5 acre cuts amongst a forest always have a significant impact to the developing ecosystem of an old growth forest, as rampant logging has shown amongst our other forests.**

**PGE's alternative analysis shows that they have other options available to them. I urge you to prioritize forest habitat and compromised wildlife species that depend upon Forest Park over the ease and profit of a monopoly company. To fail to do so, especially as our federal government actively plans to devastate protections for forest under prior leadership, leaves the door wide open to further development.**

Thank you for playing an important role in honoring the protections our forebears put upon this precious area. Your actions are amplified at this turning point of governmental leadership.

Sincerely,  
Kate Kauffman  
Lead Technician  
Backyard Habitat Certification Program

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**From:** [Alex Harber](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 5:29:48 PM

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Dear Morgan Steele,

Since moving to Portland, I've formed a deep connection to the wonder that is Forest Park. As an avid runner, cyclist, and dog owner who loves to recreate in the park, I've recently had the chance to volunteer, which spurred a deeper understanding of just how valuable Forest Park is. It's a place of immense history that includes old growth trees that are 150+ years old, while also being a critical habitat for more than 62 mammals and 112 different species of birds. I believe I speak for all Portlanders who are extremely proud to have this in our backyard.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan:

- ***First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest.*** Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- ***Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project.*** It is possible to update their power grid without impacting Forest Park at all.
- ***Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan.*** PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of all of us Portlanders, humans and mammals alike, as well as the old growth trees and the clean streams.

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Best,  
Alex Harber

**From:** [Annie](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comment re: Harborton Reliability Project  
**Date:** Wednesday, November 27, 2024 5:39:09 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Tony Bellsmith](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Here to defend Forest Park  
**Date:** Wednesday, November 27, 2024 5:47:40 PM

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Dear Christine and Morgan,

My name is Tony Bellsmith, and I am a family medicine physician in SE Portland.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. The Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife habitat, and impacting recreational areas popular to Portland residents, including my family and patients.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Tony Bellsmith, MD

**From:** [Laurie Erdman](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 6:29:51 PM

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Dear Morgan Steele,

Forest Park was one of the first places I visited in Portland when I came to visit friends in the 90s. When I eventually moved here 6 years ago and took my first hike in the park, it was like coming home. To say that Forest Park holds a deeply personal significance to me is an understatement. It is a sanctuary. I've spent countless hours exploring its trails, witnessing its unique ecosystem, and standing in awe of its ancient trees. While Forest Park is a recreational space, it provides irreplaceable value to our community and environment.

I am deeply concerned about PGE's proposal to develop within Forest Park. The proposal not only threatens the ecological integrity of the park but also contradicts its fundamental purpose as outlined in the Forest Park Natural Resources Management Plan (NRMP).

1. **Contradicting Forest Management Goals:** The NRMP's top priority is to manage Forest Park toward becoming an old-growth forest. Cutting down mature trees for this development directly undermines this goal. The replacement of mature trees with saplings would take decades, if not centuries, to recover the ecological value that would be lost.
2. **Feasible Alternatives Exist:** PGE's Alternatives Analysis clearly identifies several potential locations outside of Forest Park. Developing in these alternative areas would allow for essential infrastructure upgrades without compromising the integrity of one of Portland's most vital natural resources.
3. **Dangerous Precedent for Future Development:** Approval of this project could set a harmful precedent for future development phases in Forest Park. Allowing PGE to move forward would open the door to further habitat destruction, stream degradation, and loss of critical wildlife corridors in subsequent projects.

Forest Park is a rare and invaluable resource for our city. It cleans our air, provides critical habitat for wildlife, and serves as a space for education, recreation, and reflection. Approving PGE's proposal would not only result in significant ecological harm but also diminish the park's ability to fulfill its mission under the NRMP.

For the sake of Forest Park's trees, wildlife, and the generations of Portlanders who depend on its beauty and functionality, I urge you to **reject PGE's proposal**.

Thank you for considering these concerns and for your dedication to protecting Portland's natural treasures.

Sincerely,  
Laurie Erdman

Boise Neighborhood resident

**From:** [marian vanleeuwen](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [marian vanleeuwen](#); [janesa kruse](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 6:47:49 PM

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my name is marian van leeuwen and i have been running on the trails in forest park for many years. it is an incredible, unique place nearby to spend time outside. i have brought many friends from portland and from other places in the world to forest park.

pge's proposal directly contradicts the top priority in the forest park natural resources management plan, which is to manage the forest towards old growth.

pge's alternatives analysis shows there are several possible locations outside forest park.

approval of this project could set a precedent for future phases of pge's project and other development in forest park.

please, reject pge's proposal and save this precious piece of nature for many generations to come.

thank you very much.

sincerely,

marian van leeuwen



**From:** [Jeremiah Flores](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Forest Park  
**Date:** Wednesday, November 27, 2024 6:52:08 PM

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Hello,

PGE has long since lost its credibility when it comes to projects and the aim of benefitting Portlanders. The only priority they've consistently held is to maximize profit and to bolster big tech firms over the safety of everyday residents. Now they're proposing to add severe ecological damage to the mix.

I'm sure you've received plenty of letters expressing similar sentiments. For the above reason and those written by other concerned citizens, I strongly urge you to refuse PGE's land use permit.

Thank you,  
Jeremiah Flores

**From:** [Calen Kennett](#)  
**To:** [Steele, Morgan](#)  
**Subject:** : Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 7:06:29 PM

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Please don't cut trees for more power lines in forest park. Our park is sacred wild space. There isn't much left like that. It's special. It's important. I'm sure they can figure out a way to run power lines in spaces that aren't our beautiful forest.

Thank you  
Calen Kennett  
9 generations in the Willamette Valley  
St Johns resident

**From:** [Bodhi Hill](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 7:13:46 PM

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To whom it may concern,

Forest Park is one of our most sacred places in Portland. The fact that we have a forest here, with a management plan that directly specifies our intention to allow it to mature to old growth, is a legacy we must uphold.

Commerical interests have dominated our natural spaces for too long. They have gobbled up so much of our land, took what they could, and left it polluted. PGE's proposal to clear cut viable forest, with mature trees and old growth white oak, to expand their energy infrastructure, is a dangerous precedent that cannot be allowed.

There are already multiple known alternatives for this project that do not involve our precious forest. Please uphold the top priority of The Forest Park Natural Resources Management Plan and tell PGE to make another plan.

Thank you for your consideration,

Mandelyn Hill, born and raised Portlandian.

**From:** [Cory Wolfe](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 7:31:35 PM

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Dear Morgan Steele,

I have only lived in Portland since February of this year and the amount of nature suffusing this beautiful city is a stark and welcome contrast to many of the nature-deprived cities I've visited. My friends and I have not taken Forest Park's presence for granted; many outings to this pocket of ancient canopy have brought us to a greater appreciation for wildlife and the natural capital that we all rest upon, organic and artificial.

PGE's proposal to use their easement within Forest Park is concerning for many reasons. Although they are pursuing legal means to expand their capacity to the west, this would conflict with criteria laid out by the Forest Park Natural Resources Management Plan.

- The foremost conflict is with the goal of supporting the forest to become an old-growth forest, as most of it is currently second-growth.
- PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. They are interested in saving money, but if they're expanding to the West to cater to big tech companies, the extra cost shouldn't be an issue in the long run.
- Approving this project could set a dangerous precedent for future development in Forest Park that would further contradict its management plan. The multiphase project laid out by PGE will go from 5 acres of clearcutting to 20 acres, and who knows how much more beyond that. We as a biosphere cannot sustain more habitat loss for the sake of economic growth or "modernizing the electricity grid."
- The CEI hub is right next to Forest Park and the great cascadia earthquake is imminent. The ensuing explosion at the CEI hub is expected to incinerate Forest Park along with any PGE property within it, and it would be an extreme waste of resources to permit PGE to go forth with their project without first relocating the explosive tanks at the CEI hub. The right hand should probably know what the left hand is doing.

We as a species are at a crossroads where the choices are essentially A. Continue pretending that infinite economic growth is possible on a finite planet. Or B. Reharmonize ourselves with nature. The big tech bubble will eventually pop and we won't even notice if option B is chosen, but even so, we don't need electricity the way we need clean water, clean air, and natural capital to build our homes and hearths. I am asking you to reject

PGE's proposal on behalf of the living world and to protect this gift for us and future generations before it slips forever from our grasp.

With Love,

Cory Wolfe

**From:** [Lauren Zanko](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 7:54:35 PM

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Dear Morgan Steele,

I will keep this brief. PGE's proposal to develop inside Forest Park is a slap in the face to every Portlander. In a time of climate collapse, allowing a private company to clear cut a city forest, to gut habitat for endangered frogs, to take something beautiful and ruin it for profit? That's simply unacceptable.

PGE is not going to decrease rates, in fact, they are set to increase yet again. So why should we pay more to a company that disrespects the people and the land they service? Why should we allow the permanent and wanton destruction of something that defines the city. We shouldn't.

I urge you to reject this and further proposals of the same vein. This is a critical juncture, do that right thing.

Sincerely,

Lauren Zanko

**From:** [Tyler Gilmore](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment Opposing PGE's Proposed Harborton Reliability Project  
**Date:** Wednesday, November 27, 2024 7:58:33 PM

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Hello Morgan and Christine,

Please accept my public comment for PGE's proposed Harborton Reliability Project.

Forest Park is a major nearby carbon sequestration tool for the City and also provides innumerable health benefits by providing clean air, purifying water in the watershed, supporting mental well-being, and building community. Therefore, I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would clearcut five acres of Forest Park, causing significant impacts, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog (a federally recognized species of concern), and future phases of the project could disrupt salmon habitat (many salmon species in Oregon are threatened or endangered) in the Miller Creek watershed. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan: The NRMP's main goals for Forest Park are to (1) let the forest grow into ancient forest and (2) protect and enhance its recreational/educational value. The project also fails to meet criteria in the management plan, because there are viable alternate routes for the project outside of Forest Park.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Tyler  
he/him/his  
350PDX Forest Defense Team Volunteer Co-Lead

**From:** [steve westbrook](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 8:19:45 PM

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Hello Morgan Steele,

I only recently became aware of PGE's plans for 4 to possibly 15(!!!) acres of forest park and i'm just gobsmacked. I understand things happen in a growing city with many needs being considered but clear cutting a portion of one of the greatest urban parks on the planet is generally a bad idea. Also, this seems contradictory to the entire purpose of the park. But it's not just a park. It's home to countless species of birds and animals. They've had their habitats polluted and shrunk and ruined time and time again. Reading PGE's own plans points to the possibility of alternate locations for their plans. With so few untouched or wild/old growth places left in the world... ever shrinking natural areas.. it's common sense to protect what we can. If this goes through I worry about what i might mean for other parts of our city and state. We can't surrender our forests and parks to development. I'm asking you to reject this plan and find another solution to what PGE needs.

Once these places are gone, developed, clear cut, extracted etc.. they never come back. We shouldn't go down this road.

Best,  
Steve Westbrook



**From:** [Matt M](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Forest Park  
**Date:** Wednesday, November 27, 2024 8:31:02 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Matthew Melcarek

**From:** [Matthew Welch](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Wednesday, November 27, 2024 9:06:52 PM

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Dear Morgan Steele,

My family and I are so tied to Forest Park. Growing up in Portland, you understand how blessed we are to have this resource. I could be downtown, surrounded by skyscrapers, and then drive 5 minutes and be in old-growth forest. Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable a resource it is, both ecologically and spiritually. PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan: Contradiction of Priority Goals. The proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal. Viable Alternative Locations PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all. Risk of Setting a Dangerous Precedent Approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multi-phase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that—more cut trees, stream degradation, and habitat loss. Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,  
Matthew Welch

**From:** [LP](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Stop PGE from pillaging Forest Park for greedy tech companies  
**Date:** Wednesday, November 27, 2024 10:59:03 PM

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**Intel and the rest of Hillsboro can expand their own power source out where they are. Don't touch Forest Park. I agree with the sentiments below and I'm tired of greedy tech exploiting the planet. Build solar in Hillsboro. Build a wind farm in Hillsboro. Expand power lines in Hillsboro. We need trees and green spaces now more than ever with climate change.**

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Leslie Poston

**From:** [Courtney Jarvis](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Request to Deny PGE's Harborton Reliability Project  
**Date:** Thursday, November 28, 2024 5:28:35 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Courtney Jarvis

**From:** [Michelle Krause](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Forest Park PGE clear cut permit public comment  
**Date:** Thursday, November 28, 2024 6:56:25 AM

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To whom it may concern , I am submitting my public comment highlighted below ↓  
I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Please acknowledge receipt of this comment.  
(503)577-2050  
Michelle Krause

**From:** [Aspen DeVillier](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please don't clearcut Forest Park  
**Date:** Thursday, November 28, 2024 7:41:21 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Aspen Johnson  
801-656-7411  
920 NE 44th Ave, Portland, OR 97213

**From:** [Ted Magnuson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition to the Harborton Reliability Project; PGE  
**Date:** Thursday, November 28, 2024 8:50:23 AM

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Greetings Portland Permitting and Development

I am writing as a PGE ratepayer to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Ted Magnuson  
by iPhone

**From:** [Brian Runt](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Deny PGE Permit  
**Date:** Thursday, November 28, 2024 9:45:52 AM

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I'm writing to urge Portland Permitting and Development to DENY the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents.

Please refuse PGE's land use permit. Thank you for your consideration.



**From:** [Frederika Sullivan](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Please refuse PGE" use permit — a message from a student in Portland, Oregon  
**Date:** Thursday, November 28, 2024 10:00:15 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of **at least five acres** of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Sustaining these woods and the biodiversity they house is crucial to the health of the ecosystem surrounding Portland. Please refuse PGE' use permit. Thank you for your consideration.

Very Best,

Frederika Sullivan

she/her/hers

PhD Student | Wright Lab

Neuroscience Graduate Program

Oregon Health & Science University

**From:** [Annabel Pirrie](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** No clear cuts in Forest Park!  
**Date:** Thursday, November 28, 2024 10:05:26 AM

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Hi Morgan and Christine,

I am a Portland resident and I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

I hope my comments are taken into consideration ahead of December 4th.

Thanks,  
Annabel

**From:** [airs.passing-0g@icloud.com](mailto:airs.passing-0g@icloud.com)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Thursday, November 28, 2024 10:06:58 AM

---

Dear Morgan Steele,

I have been hiking in Forest Park for over 30 years. I'm on one of its many trails a couple of times a week to enjoy its beauty and to have a peaceful place to exercise and unwind. It is rare to have hiking trails so easily accessible right in the middle of a city such as ours. Forest Park is one of the top reasons why I value living in Portland.

So I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Michael Troper

**From:** [Austin Schubert](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Concerned citizens request to stop PGE plans for Forest Park  
**Date:** Thursday, November 28, 2024 10:15:27 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Sustaining these woods and the biodiversity they house is crucial to the health of the ecosystem surrounding Portland. Please refuse PGE's use permit. Thank you for your consideration.

Austin Schubert

**From:** [Briana Knez](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Comment: Refuse PGE's Harborton Expansion  
**Date:** Thursday, November 28, 2024 10:17:10 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. Dealing with climate change projected to increase drastically over the next few decades, we cannot afford to continue to destroy habitat and increase the harmful impacts of climate change. Shortsighted investments like this may seem good for short term gains, but harms us and future generations in the long term. The more ecological diversity we lose, the more fragile all species become, which we often forget includes humans.

Allowing PGE to clear cut this acreage would set a precedent for continuation of cutting small chips of Forest Park over years and years. If we set a precedent of protection of these habitats now, we will show where we stand in protecting what makes Portland worth living in. This project is really about supporting global businesses like Intel which threaten to destroy farmlands and fragile habitats. The city I want to see Portland turn into is one based on thriving locally owned small businesses and regenerative farms that put their money back into the city. I don't want to see it turned into a soulless strip mall devoid of forest life and run by global corporations that will fire and abandon thousands of local residents once shareholders decide their portfolio needs a boost. We need regenerative small farms, local businesses, and biodiversity to survive the next 100 years. Microchips are optional.

Briana Knez

**From:** [Lauren Skonieczny](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment: Harborton Reliability Project  
**Date:** Thursday, November 28, 2024 10:39:25 AM

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Hello,

I am writing as a resident of Portland who often enjoys the wondrous Forest Park - a gem of our city for both residents and visitors alike.

I urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As the City itself has noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would involve clear cutting, which has time and time again proven devastating to ecosystems as it disrupts the underground network supporting the forest.

The trees along the powerline corridor provide crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents.

Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration.

---

Lauren Skonieczny  
[lauren.skonieczny@gmail.com](mailto:lauren.skonieczny@gmail.com)

**From:** [Laura Norton](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Happy Thanksgiving. (Some food for thought.)  
**Date:** Thursday, November 28, 2024 10:53:03 AM

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Hello Morgan and Christine,

I'm a small woman-owned business here in Portland, sharing my concerns with many in this city.

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Thank you,  
Laura Norton

Bosk  
(A Plant-Based Wellness Shop and Spa)  
3746 NE 42nd Ave.  
Portland, OR 97213  
[boskpdx.com](http://boskpdx.com)  
IG: bosk\_pdx

**From:** [Eva](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park PGE Comment  
**Date:** Thursday, November 28, 2024 11:10:47 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Warmly,

Eva Kosmas Flores

Online Courses + Presets | [www.EvaKosmasFlores.com](http://www.EvaKosmasFlores.com)

Podcast | [www.FeelsLikeHomePodcast.com](http://www.FeelsLikeHomePodcast.com)

Blog | [www.AdventuresInCooking.com](http://www.AdventuresInCooking.com)

Cookbook | [First We Eat](#)

[Instagram](#) | [Pinterest](#) | [Facebook](#)



**From:** [Soliana Gonzalez](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Hello  
**Date:** Thursday, November 28, 2024 12:01:40 PM

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Thank you for serving Portland!

I imagine this position is often difficult and liable to pull you in many directions.

Here is an action that will help you go to bed knowing you did your best for the people, and wildlife of Portland: Please protect Forest Park. Do not allow PGE a land permit. This would usher the beginning of major destruction to one of Portland's most valuable aspects: Our green, forested spaces. PGEs plan clearly counters NRMP's goals, which are to create/protect an Ancient forest and to provide the people of Portland with desperately needed forest space. We need this park intact for our Mental Health as well as our education! There are many ways we can move forward that do not involve mangling our sacred spaces. Please, We love/need these life-forms and they need us to protect them.

Thanks for your time and consideration,  
-Soliana Gonzalez

**From:** [carmen keating](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Protect Forest Park  
**Date:** Thursday, November 28, 2024 12:08:45 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Carmen Keating

**From:** [saravanan.mylsamy](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Please DEFEND FOREST PARK  
**Date:** Thursday, November 28, 2024 12:12:02 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thanks,  
Saravanan Mylsamy  
Portland Resident

**From:** [McKenzie C.](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Thursday, November 28, 2024 12:24:46 PM

---

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Sustaining these woods and the biodiversity they house is crucial to the health of the ecosystem surrounding Portland. Please refuse PGE's use permit. Thank you for your consideration.

Very Best,  
Stephanie Corley

**From:** [elaine](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Thursday, November 28, 2024 12:34:43 PM

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Hello Morgan Steele,

I have lived in Northwest Portland for over 7 years now, and Forest Park has been one of, if not the most, consistent things in my life as I have grown during my 20s. When I first moved to NW Portland, I was blown away by how easy it was to escape the city smells and noises and be surrounded by trees and wildlife in a matter of minutes. I have always lived within a 10 min walk of a trailhead and find myself running Forest Park's trails multiple times a week. I have felt and shared every emotion in this park - joy, anger, sadness, and peace. Some of my closest friendships have developed from shared miles in the park on every trail that Forest Park has to offer. This park's importance not only to me, but also to many of my friends, is why I am writing to you today.

PGE's proposal to develop inside Forest Park is concerning for a multitude of reasons. But one of the biggest is that their proposal blatantly ignores multiple criteria for development laid out by the Forest Park Natural Resources Management Plan.

1. First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings is quite literally the opposite of this priority and sets back growth by multiple generations.
2. PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. In layman's terms, this means that PGE can update their power grid without impacting Forest Park at all.
3. Approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss. We are standing on the edge of a slippery slope that could lead to so much more of Forest Park being cut down because it's the "easiest" thing for a corporation to do.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. In a reality where our environment is being consistently deprioritized and put on a backburner to the dollar signs of the rich who won't be directly impacted, I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Thank you for your consideration,  
Elaine Apaza

**From:** [Corey Adkins](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment on PGE Land Use Permit for Harborton Reliability Project  
**Date:** Thursday, November 28, 2024 12:46:27 PM

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Good afternoon,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,

Corey Adkins, Portland Resident

**From:** [Ashley So](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE comments  
**Date:** Thursday, November 28, 2024 1:30:25 PM

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Good afternoon,

I'd like to submit a comment and request that we deny the permit for the PGE Harborton Reliability Project.

I personally have been a volunteer for the Harborton Frog Taxi for several years. I've seen and held in my hands the lives that live within Forest Park. Our sole job is to keep the Red Legged Frogs alive and reproducing. Before our organization the frogs were nearing endangered status. Expanding the power line will be detrimental to these species as well as dozens of others. This habitat is crucial for these frogs to survive. Clear cutting will cause catastrophic and irreversible damage.

Additionally, PGE's power line expansion will not benefit Portland's residents but rather create energy infrastructure investments for billionaire corporations such as Intel and Amazon.

I strongly oppose this project due to its ecological and economic impacts on myself and the amphibian residents of Forest Park.



# Harborton Frog Shuttle



## The Frog Taxi is giving the red-legged frogs of Portland a shot at survival

Forest Park is home to Portland's largest population of red-legged frogs, a state-sensitive species. To get from Forest Park to their breeding site, they must cross two roads, a highway, and two sets of railroad tracks. The Harborton Frog Shuttle volunteers - also known as the frog taxi - increase this populations' odds of survival by shuttling them to and from their destination.





Thank you,  
Ashley Sorenson

**From:** [Heather Ikeler](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** No Forest Park Clearcut  
**Date:** Thursday, November 28, 2024 3:01:00 PM

---

Hello,

Forest Park has been an important part of my life since I moved to the Willamette Heights neighborhood in 1976. In high school I would come home at noon to walk the neighbor's dogs in the park, my friends and I would spend weekend nights scaring ourselves at the "witches castle", I continue to walk there with those same friends. It is and always has been the best part of living in Portland. I am deeply concerned about the reality of the climate crisis and recently spent a great deal of money installing an electric heat pump and hot water heater in my home. I have made a good faith commitment to electrification and moving away from fossil fuels in hopes that our forests will continue to thrive. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

This project is not for supporting energy needs of local communities, as PGE claims, but for supporting large tech companies like Intel on residential ratepayers' dime.

PGE is focused on expanding transmission and energy generation infrastructure to meet the demand of rapidly growing industrial facilities, such as Intel's new \$36 billion chip-making plant in Hillsboro, which would consume roughly as much electricity as 50,000 homes. According to PGE's schedule for load growth change, residential demand is projected to increase by only 3.5% between 2016-2025. Heavy industrial demand, on the other hand, has a projected increase of almost 150%. PGE has repeatedly raised energy costs for ratepayers while subsidizing energy costs for large tech industry facilities in Washington County's Silicon Forest.

Sincerely,

Heather Ikeler  
3054 SE Morrison Street  
Portland, Oregon  
97214  
Sent from my iPhone

**From:** [Tyler Canada](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Defend Forest Park  
**Date:** Thursday, November 28, 2024 3:10:19 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Portlander Tyler Canada

**From:** [Sarah Schmeer](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Thursday, November 28, 2024 5:07:58 PM

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Dear Morgan Steele,

I think part of what makes Portland so special is the thorough integration of nature and spaces for people - that's why I'm so concerned about PGE's proposal to develop inside Forest Park.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

The proposal also directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

In addition, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

Finally, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely, Sarah Schmeer

**From:** [Shab Bahmanyar](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Fwd: Public comment about PGE powerline expansion  
**Date:** Thursday, November 28, 2024 5:56:18 PM

---

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration,  
Shabnam Bahmanyar

**From:** [Kelsey BT](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Forest Park - please say no.  
**Date:** Thursday, November 28, 2024 6:51:36 PM

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I hope this email finds you well. I am writing to express my concern about the proposed PGE project to clear the forest for development, as outlined in the **Harborton Reliability Project**. While I understand that this project may offer potential economic benefits, I urge you to reconsider its impact, both on the environment and on the broader community.

First and foremost, forests are not only crucial to the health of our planet but are integral to the well-being of local ecosystems, and our own Forest Park is no different. The proposed area is home to a variety of wildlife and serves as an important carbon sink, absorbing CO2 from the atmosphere. By clearing it, we risk disrupting these delicate ecosystems, threatening biodiversity, and accelerating the impacts of climate change.

Additionally, the forest plays a vital role in preventing soil erosion, regulating water cycles, and ensuring the stability of local weather patterns. Its loss could lead to a significant increase in flood risks, soil degradation, and water scarcity, issues that could have far-reaching consequences for nearby communities.

In recent years, there has been a growing awareness of the long-term economic benefits of preserving natural habitats. The forest is not just an ecological asset; it is a resource for tourism, recreation, and education, offering opportunities for sustainable development that do not require its destruction. By opting for a more sustainable approach, you could help position your company as a leader in responsible development, benefiting from public support and possibly attracting new partnerships.

I fully appreciate the need for progress and growth. However, I believe that there are alternative strategies that can be explored—whether it be focusing on land already cleared, developing eco-friendly infrastructure, or investing in technologies that mitigate environmental harm. Such solutions would allow us to move forward while safeguarding the invaluable natural resources that future generations depend on.

I kindly ask you to reconsider this project in light of the far-reaching consequences of deforestation. The preservation of our forests is not merely a matter of environmental concern; it is a critical responsibility for ensuring a livable, sustainable future.

Thank you for your time and consideration. I hope that together, we can find a path forward that balances both progress and preservation.

Sincerely,

Kelsey Tate, 4th Generation Portlander and native Kalapuyan descendent.

**From:** [Megan Williamson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** STRONGLY OPPOSED  
**Date:** Thursday, November 28, 2024 7:16:42 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Megan Williamson



**From:** [Ellen Hubbs](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Thursday, November 28, 2024 7:23:30 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Ellen Hubbs  
8 year Portland Resident



**From:** [Martin Coventry](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comments on Forest Park  
**Date:** Thursday, November 28, 2024 7:37:19 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Martin Coventry

**From:** [Henry Guinn](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Stop PGE's Harborton Reliability Project, Protect Forest Park  
**Date:** Thursday, November 28, 2024 9:14:27 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit and future land use permits seeking to clearcut forest park for big tech energy consumption.

Thank you for your consideration.

Henry Guinn

**From:** [Robin Nemec](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park tree removal  
**Date:** Thursday, November 28, 2024 10:18:47 PM

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Dear Morgan Steele,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Robin Nemec  
253-548-6897

**From:** [Sophieware777](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Defend Forest Park  
**Date:** Thursday, November 28, 2024 10:46:13 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [ANDREA D AMICO](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Friday, November 29, 2024 6:48:58 AM

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Good Day

My Name is Andrea, and I am a member of Save Scholls. And I strongly urge you to deny PGE's land use permit for 5- 20 acres for transmission lines.

Forest park was deeded in 1903 and is currently 5200 acres. This may seem like a lot, but Washington County started building over their SNR's . Out of their 727 sq miles they only have 3900 acres left of SNR's . And mitigation

doesn't compare to natural forest. Saplings that die compared to 100-year-old trees. With no follow up to replant.

The power isn't needed for our population, it is needed for future data centers. We need to protect our residences the power data centers, and research centers use isn't even on the same scale of a neighborhood. Oregon is known for its beauty and natural spaces. Everyone knows as soon as you start chipping away it will never stop.

Please do not accept this permit instead preserve and protect Oregon.

We will never have a chance to rebuild a forest

Thank you for your time and consideration

Andrea D'Amico

Save Scholls

**From:** [Brooke Thompson](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Forest Park clear-cut  
**Date:** Friday, November 29, 2024 7:36:17 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [tyler james](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Friday, November 29, 2024 8:40:16 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline

expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland Residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

Tyler

**From:** [Mary Shivell](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Letter of Support for Denial of PGE's land use permit request  
**Date:** Friday, November 29, 2024 9:02:12 AM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harm bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.**

Thank you,

Mary Shivell  
David B. Griffiths  
Northeast Portland Residents,  
Bridgeton Neighborhood



**From:** [Paul.Lemaire@lamresearch.com](mailto:Paul.Lemaire@lamresearch.com)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Against the PGE development in forest park  
**Date:** Friday, November 29, 2024 10:44:38 AM

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Hello,

My name is Paul Lemaire and the planned clear cutting of forest park has me deeply disturbed. I understand the need for electrical infrastructure, but forest park is a cost too high for such a project. Forest park is deeply valuable to me and the Portland community, and a major reason I choose to live in Portland. Ravaging acres of forest for power lines is a slippery slope that could open up further destruction in the park. This park is a unique gem for a city and I plead with you to not do harm to it.

Thank you for your time and consideration.

Paul Lemaire

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Confidential – Limited Access and Use

**From:** [Josephine O'Connor](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE & Forest Park  
**Date:** Friday, November 29, 2024 11:11:24 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Josephine O’Connor, Portland State Student & lifetime Oregonian.

**From:** [Carolyn](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re LU24-041109 CU EN GW  
**Date:** Friday, November 29, 2024 11:20:03 AM

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Good morning,

I am writing to implore Portland Permitting and Development to DENY the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

Forest Park holds profound personal significance for me. After a serious health scare, I spent several months walking its trails, finding solace and strength in its quiet beauty. As part of my healing journey, I set a goal to hike the entire Wildwood Trail from south to north, which I accomplished over several months as my health improved. Since then, Forest Park has become my sanctuary.

I hike its trails regularly, marveling at the diversity of its ecosystems and the sense of peace it provides.

When friends and family visit from out of town, I always take them to the park. Without fail, they are amazed by this expanse of nature right in the heart of Portland—a city we are all proud to call home. I am fortunate to live close enough to walk or bike to its trails, and I know many other Portland residents treasure it as much as I do.

But Forest Park is more than just a personal refuge. It is a vital part of Portland's identity and a crucial resource for the environment. The park plays an essential role in preserving biodiversity, providing a habitat for countless species, sequestering carbon, and protecting the health of our air and water. Every tree contributes to these functions. Allowing even limited deforestation would not only harm the park's ecosystems but would also erode its value to our community and future generations.

I respectfully urge you to protect Forest Park

from deforestation and clear-cutting. Instead, let's prioritize conservation and explore sustainable forest management practices that preserve its beauty, functionality, and accessibility for all.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is

clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your care-full consideration.

**Respectfully**  
**Carolyn Reid**

[Sent from Yahoo Mail for iPhone](#)

**From:** [capers.rumph](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Opposition to clearcutting portions of Forest Park the Harborton Reliability Project transmission lines  
**Date:** Friday, November 29, 2024 11:22:37 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland area residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Furthermore, speaking as a Hillsboro resident, there is strong grassroots opposition here to the further expansion of Intel and the proposed new data centers.

Please refuse PGE’s land use permit. Thank you for your consideration.

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Capers Rumph  
[www.theoppositeofwar.com](http://www.theoppositeofwar.com)

“To laugh and love much; To win the respect of intelligent people and endure the betrayal of false friends; To appreciate beauty; To leave the world a better place, whether by a healthy child, a garden patch, or a redeemed social condition; To know that even one life has breathed easier because you have lived. That is to have succeeded.”

**From:** [Alex Meyer](#)  
**To:** [Steele, Morgan](#)  
**Subject:** In Defense of Forest Park  
**Date:** Friday, November 29, 2024 12:12:09 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.



**From:** [Sophie Biddle](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please protect Forest Park  
**Date:** Friday, November 29, 2024 12:21:16 PM

---

Hello,

I'm writing to respectfully voice my request that PGE's revised proposal to cut 15 additional acres of Forest Park be stopped.

Forest Park has been a haven for me and thousands of other Portland residents and visitors. While we must always balance the need for infrastructure and wild spaces, this project is out of balance. Removing publicly accessible wild habitat to provide more electricity to private industry is unethical. Please prioritize our environment, animal kin, and regular Portland residents over the interests of private industry.

Intel and other large energy users should be encouraged to use their properties as solar and biofuel generating sites. This would help meet their energy needs without destroying critical wilderness spaces within Portland.

Thank you for your time and consideration.

Best regards,  
Sophie Biddle

Sophie Biddle  
+1 (602) 653-6624  
Website: [sophiebiddle.org](http://sophiebiddle.org)  
Work: [sbiddle@uw.edu](mailto:sbiddle@uw.edu)  
Personal: [skbiddle@gmail.com](mailto:skbiddle@gmail.com)

**From:** [Molly Hruska](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Save the frogs!  
**Date:** Friday, November 29, 2024 1:40:54 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

I am a local Realtor and I recently sold a property that was near where the frogs pass through. It is a special place with many volunteers to make sure the frogs are well cared for. These frogs need to be protected !

Thank you for your consideration

**Molly Hruska**

Principal Broker

P: 503.939.7773

E: [Molly@MollyHruska.com](mailto:Molly@MollyHruska.com)

W: [MollyHruska.com](http://MollyHruska.com)

More Realty

33615 E. Columbia Ave, Scappoose, OR 97056

**From:** [Timothy Cooke](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE's Harborton Reliability Project  
**Date:** Friday, November 29, 2024 2:26:16 PM

---

Hi Morgan and Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Regards,  
Timothy Cooke

6346 N Detroit Ave  
Portland, OR 97217  
971.322.5151

**From:** [kristin myers](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** PGE permit  
**Date:** Friday, November 29, 2024 2:26:50 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Kristin Myers

[Sent from Yahoo Mail for iPhone](#)

**From:** [Jaime N Smith](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Action: Forest Park  
**Date:** Friday, November 29, 2024 2:30:07 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird, and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Thank you,

[Jaime Smith](#)  
Sr. IT Consultant  
Business Relationship Manager

[Kaiser Permanente](#)  
Care Delivery Technology Services (CDTS)  
2850 NW Nicolai St  
Portland, OR 97210  
503.894.3445 (Mobile phone)

**Upcoming PTO:**



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Thank you.

**From:** [Craig Hermes](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Friday, November 29, 2024 2:33:54 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.  
Melissa Hermes

Sent from my iPhone

**From:** [Nancy Charest](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Friday, November 29, 2024 2:39:58 PM

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One it's gone, it's gone

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely, Nancy A Charest

**From:** [inabigcoat](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Friday, November 29, 2024 2:46:43 PM

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Hello!

I hope your holiday season has been well so far.

I'm from Portland, and I love Portland's beautiful Forest Park as I'm sure you do too. I know I don't have to tell you how sensitive a forest system can be to changes on the order of new path creations to say nothing of acres of clear-cutting. I ask you do everything in your power as city planners to prevent the habitat loss and ecological damage to this park that will result from PGE's Harborton Reliability Project. Reliable electricity does not need to come at the cost of biodiversity, old growth safety, and the ultimate health of our forests. It should not be necessary. Further, don't let them greenwash power infrastructure expansion deeper into our forests by saying it's better for Portland residents and increasing use of electricity. Tell them to get creative and use what they already have. Refuse their land use permit.

"I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant damage to Forest Park and the surrounding ecosystem. This will undermine Forest Park's management goals, harm wildlife populations, and degrade recreational areas popular to Portland residents.

The project requires clear-cutting at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for imperiled species, such as the Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and all species of Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration."

Thank you! Have a great day,  
-Erin



**From:** [beth stinson](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW - PGE's Proposal!  
**Date:** Friday, November 29, 2024 2:58:07 PM

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Dear Morgan Steele,

When I first moved to Portland, I was floored by how amazing Forest Park is! It's so unique and we're *so lucky* that it exists to this day, not to mention that the elusive Northern Pygmy Owls reside there among many other species of wildlife. Never in my wildest dreams would I have guessed that they were there, and I once lived by forests in the Rocky Mountains. So amazing! Every time I drive by from the NE there are hikers and residents enjoying the Park, a park that allows us all to breathe clean air. I can tell I am not in the least alone in my amazement. It is a highly valuable treasure in the city, better than Central Park even.

Please don't open the floodgates to developers of Forest Park even if they are an electric company. Please, I'm begging you to reject PGE's proposal and work with them to find another way. Clear cutting and breaking up two streams and wetlands is not the way.

I know they must have their reasons, but carving out an unusual and very long rectangle into the middle of the forest is doubly dubious. It's like cutting the forest in half for no reason. PGE's own research in making this proposal shows that there are several alternative locations *outside* Forest Park to develop a new location.

I know there are numerous other options for land available. Why would an electric company need to build on/use a hillside? In fact, it's *so much more* expensive to clear cut, build on a hillside, and *more* dangerous to everyone in Portland. Having lived in NYC when ConEd had serious fire-starting problems, this is very worrisome. Lucky for all of us, it happened right on East River and away from a large amount of kindling. Imagine if they were in the middle of Central Park?! That's exactly what this is, but worse.

Unbelievable to even propose a project like that when you take their research into reflective account. Doesn't this proposal directly contradict the top priority of the Forest Park Natural Resources Management Plan too? That doesn't seem right. As far as I can tell, many upon many residents and organizations are against this proposal. Please, I know you must be smarter and more responsible than to approve this project.

Thank you for your deep consideration,

Elizabeth Stinson  
Concerned resident of NE Portland

**From:** [Felicia Gray](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Friday, November 29, 2024 2:58:10 PM

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Dear Morgan,

It is on 'opt outside' days like today (Friday Nov 29) that really highlight what a treasure Forest Park is - both for the human neighbors and animals that call the Forest home. I love visiting Forest Park in all seasons, knowing I will be transported from the highways, streets and cul-de-sacs of the rest of life into a habitat that is connected between humans and plants and animals. I love to smell the fresh air and notice the seasons change in the trees and flowers and species that I see. I love seeing newts enjoy the bogs and hear woodpeckers and other birds collecting berries. This is a treasure to have this urban forested environment in Portland and it is therefore important to protect by **rejecting PGE's proposal for the Harborton Reliability Project that would involve clear cutting 4.7 acres in the North of the Park** that would **remove old growth trees** and **ruin habitat** that is crucial to many species.

This proposal is flawed for a number of reasons:

1. It directly contradicts the top priority in the Forest Park Natural Resources Management Plan - **which is to manage the forest towards old growth**
2. There are **alternative locations** outside to support the project outside of Forest Park, based on PGE's own analysis
3. Approving this proposal will **create a slippery slope** for future phases of the project that will continue to destroy important habitat

Please **reject PGE's proposal** and maintain Forest Park as it is currently treasured by humans and wildlife.

Sincerely,  
Felicia Gray, PhD

**From:** [Shura Zeryck](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Friday, November 29, 2024 3:27:38 PM

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Dear Morgan Steele,

I've lived in Portland since I was a very small child, and one of my favorite activities has always been to go hiking in beautiful Forest Park. No matter what stressful things are happening in daily life, there is something about being in an old-growth forest that calms me down to the bones. By itself that might be selfish, but Forest Park is also an incredibly special space for many other people and many other species. Additionally, its many trees provide shade and filtration that affect the wellbeing of the rest of the city; as long as water flows and wind blows, the areas near our city will matter to everyone in it.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that—more cut trees, stream degradation, and habitat loss.

It is a rare and wonderful privilege to live near a place like Forest Park, and we need to respect it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I urge you to reject PGE's proposal for the sake of the wildlife, the people of Portland, and our future generations.

Sincerely,

Alexa Zeryck

**From:** [Kristen Sartor](#)  
**To:** [Steele, Morgan](#)  
**Subject:** We need forest park- deny the permit for PGE land use  
**Date:** Friday, November 29, 2024 3:33:33 PM

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Hello,

I am writing to respectfully urge Portland Permitting and Development to deny the permit being sought by PGE for land use for the "Harborton Reliability Project". It would be catastrophic for Forest Park and the ecosystem nearby if this permit was granted, as the city as noted. This was be a disaster for surrounding birds, wildlife,our trees, and our trails. The northern red legged frog would be especially at risk.

This permit would not benefit Portland. We should be investing in our communities, not Intel.

Forest Park is a place I've treasured and enjoyed for over a decade. Its a part of what makes our city special and I want to see it preserved.

Please be strong against corporate greed and say no to this project. Please say no to the land use permit.

Thank you very much,

Kristen Sartor, Portland resident (97212)

**From:** [David Zeryck](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project - public commentary submission  
**Date:** Friday, November 29, 2024 3:55:15 PM

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Hello Ms. Steele,

I would like to submit my opposition to the Harborton project, which would damage almost 5 acres of mature forest for PGE transmission's right of way.

Considering that there are alternatives for PGE to follow, it strikes me as against the interests of the city with respect to Forest park to let this plan go forward, e.g., the Forest Park Natural Resources Management Plan has an imperative to maintaining and enabling old growth forest.

I would like the city to press PGE on the efficacy of alternative routes and infrastructure available. I am not against upgrading the grid — I work in an industry that uses a lot of power — but I also want my grandkids to be able to enjoy the forest, and once we establish precedents like this others will more easily follow.

I find the mitigation plans short of optimal — wetlands are especially fruitful for species support and it does not appear their plan addresses the loss of wetlands.

Thank you for your consideration.

Dave Zeryck  
Lake Oswego, OR

**From:** [Mallory Pratt](#)  
**To:** [Steele, Morgan](#)  
**Subject:** : Re:LU 24-041109 CU EN GW  
**Date:** Friday, November 29, 2024 4:04:56 PM

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Dear Morgan Steele,

I moved to Portland in 1992. One of the reasons I moved here is because I went to Forest Park during a visit in 1991 and thought "This is the city for me." The sheer beauty of the landscape, its proximity to neighborhoods and its size - an irreplaceable resource to lift one's spirits and move one's body in tune with birdsong, wind-rustle and flowing water. I learned the natural history of this region in Forest Park. I took classes that used Forest Park as a living laboratory. I honestly can't think of a resource more special to Portland other than the rivers. In particular, I have hiked to the overlook of the confluence of the Willamette and Columbia Rivers on the Wildwood trail from Newberry Road right where this proposed development is located. I have brought countless visitors to the area to this very spot. The notion of clearcutting that area is both shocking and unwise.

Which is why I am so alarmed by PGE's proposal to develop inside Forest Park. The proposal completely contradicts the goals of the Forest Park Natural Resources Management Plan. First, the Management Plan's top goal is to support the forest becoming old-growth. That area has mature second-growth characteristics that are perfect for achieving that goal our children's lifetime. Cutting them now sets that timeline back 200 years! Second, there are, according to PGE, viable alternatives that avoid Forest Park altogether. That is also stated in the Management Plan as a criterion for rejecting a project. Last, and even more alarming, approving PGE's proposal sets a precedent that development in Forest Park that contradicts the Management Plan is okay. It is not.

We are in the midst of a climate crisis that is going to change our lives in ways we don't even know about yet. Preserving, guarding, nurturing every natural resource we have that mitigates those changes is paramount to keeping Portland livable and thriving, for people, for plants and for all the ecology that we take for granted that supports us. I'm urging you to reject PGE's proposal as illegal, unnecessary and irresponsible.

Sincerely,  
Mallory J Pratt  
5205 NE 29th Ave  
Portland OR 97211

**From:** [Alexander Matteson](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Save forest park  
**Date:** Friday, November 29, 2024 4:22:24 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Trey Wehrmeyer](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition of the Harborton Reliability Project  
**Date:** Friday, November 29, 2024 7:51:59 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. The lack of transparency about this project and the blatant lack of respect for our city’s land has compelled me to reach out in opposition of the permit. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. PGE is not being truthful when they insinuate that sensitive species will not be impacted. This is a species that volunteer groups in our community, like the Harborton Frog Shuttle, have come together for to protect. Furthermore, these impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Robert Wehr  
Portland, OR resident



**From:** [Suze Wehr](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Say NO to the Harborton Reliability Project  
**Date:** Friday, November 29, 2024 7:58:20 PM

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Dear Morgan Steele,

Forest Park, the little wilderness in Portland's backyard, is the place I fell in love with this city and decided to move to Oregon. This incredible ecosystem supports critical wildlife habitat, mature forest stands, and a buffer to the terrifying wildfires we are seeing more and more across the state.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project, directly conflicting with the Forest Park Natural Resource Management Plan, would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Amphibians are incredibly important indicator species and key fixtures in the web of life. The Pacific Northwest is a special place for this order, home to many native species and a haven for these creatures even as over 40% of amphibians worldwide currently face the very real possibility of extinction. This is one reason I have dedicated my graduate thesis at Oregon State University to studying them.

Northern Red Legged Frogs are only found in the PNW, and their habitats are threatened every day by new development. Don't let this project pose yet another danger to their continued survival. As a member of the Harborton Frog Shuttle volunteer group, I have spent cold and rainy nights by Highway 30, where a crucial migration pathway was destroyed for yet another development project. Together, my team spent hours rescuing these incredible frogs in buckets to help them reach their intended habitat in the wetland below to be able to start the next generation. While we know we can't save all of them, we protect thousands every year, and every one matters. Join our efforts and that of many many other Portlanders to stand up for coexistence with urban wildlife as our city grows.

Additionally, PGE's power line expansion will NOT benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I cannot share with you enough how much Forest Park means to the residents of Portland. It is the place where we run for miles and tackle new challenges, where we build community while taking care of trails, where we bring visitors and show them a little taste of PNW magic. Whether you're interested in the tourist dollars generated, the recreational pursuits, the chance to build community at a time when society has been fractured so deeply past a tough past few years... we need Forest Park and places like it to be protected over corporate interests.

**PGE will not remember that you helped it build more powerlines, but the people who love Forest Park will never forget what you choose to do next.**

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

With hope,

Suzanna Wehr, Portland resident



**From:** [Liz Saufley](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Harborton Reliability Project-Comment Period  
**Date:** Friday, November 29, 2024 8:04:10 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

I regularly hike and spend time in Forest Park, enjoying the quick getaway from city life. Since the early 20th century, Portlanders have fought to protect this forest and prevent further destruction of native habitat, so that future generations can enjoy this piece of nature and take a break from the stress of life's demands.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are **directly in conflict** with the Forest Park Natural Resource Management Plan.

Once approved, five acres will be clear cut, and later, an additional 15 acres. This section of forest is adjacent to the Harborton frog crossing and **contains riparian habitat, heritage oaks, and mature forest stands**. The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern.

Furthermore, the additional clearcutting will threaten salmon in the Miller Creek watershed.

PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal **fails to comply** with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Liz Saufley  
SW Portland resident

**From:** [River Foley](#)  
**To:** [Steele, Morgan](#)  
**Date:** Friday, November 29, 2024 9:16:50 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
River Foley

**From:** [Sage Wyrick](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please protect forest park!!  
**Date:** Friday, November 29, 2024 11:02:27 PM

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As a someone who's grown up and lived most of their life in Portland I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. Keeping Portland more forested will also help absorb carbon and decrease climate changes acceleration and keep the city a little cooler as it inevitably advances.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. This place has been a refuge to me and many others the forest offers so much more to us when left intact.

Thank you for taking the time to read this,  
Sage Wyrick

**From:** [Lindsay S](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Don't Cut in Forest Park  
**Date:** Friday, November 29, 2024 11:09:36 PM

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Hello Morgan and Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals (maintaining the forest to become old growth/ancient), harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

Forest Park is a crown jewel of urban parks, home to many species - an ecological refuge amid a more developed area of the state. Logging within it is unjustifiable.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

Comparing these two demand categories are apples and, well, factories.

I am strongly opposed to this project due to its ecological impacts: the degradation of a natural area better left intact at a critical, worsening point in the climate crisis. PGE's project proposal also fails to comply with the Forest Park Natural Resources Management Plan.

We can't let utilities run amok catering to these outsized stakeholders. Please refuse PGE's land use permit.

Thank you for your consideration,  
Lindsay Schuelke



**From:** [Arielle Corcoran](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Saturday, November 30, 2024 9:47:02 AM

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Dear Morgan Steele,

I moved to Oregon this year from the central states to enjoy nature first and foremost. The juxtaposition of city and nature, the way they respectfully coexist, and the care Oregon puts into maintaining our forests are all extremely important to me. Forest Park is a gift and a valuable resource, both ecologically and spiritually. Nature is vital to our mental health which is something our whole country needs to prioritize.

Copied and author unknown:

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources

Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Put PGE's buildings somewhere else.

Be blessed & be well,  
**Arielle Tichy**

“To live is the rarest thing in the world. Most people exist, that is all.” ~Oscar Wilde



**From:** [Linda K. Johnson](#)  
**To:** [Steele, Morgan](#)  
**Subject:** :LU 24-041109 CU EN GW - PGE/Forest Park  
**Date:** Saturday, November 30, 2024 9:48:25 AM

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Dear Morgan - This communication concerns the proposal by PGE to create unwarranted and unprecedented access through Forest Park to upgrade their services. Thank you for your attention to this letter.

I am a 4th generation Oregon native and have lived in Portland virtually all of my 63 years, with the exception of time away at college and a fellowship in Berlin. I am also an esteemed artist in this community and created my first public performance work - *Finding the Forest*, in and for Forest Park in 1991. Intent on foregrounding this irreplaceable natural asset that defines our city in many ways, over 2000 citizens came from all over the tri-county to walk the park over an early fall weekend over 35 years ago now, many experiencing the park for the first time. Like Central Park and Golden Gate Park, Forest Park is a shared space for all of the citizens of this region. The largest urban forested park in the country and one of the largest in the world, its value to our city and its citizens is beyond measure in any metrics that do not intersectionally consider mental health, solitude, witnessing the wild, fitness, ecosystem diversity, air quality, equity and inclusion, and beauty. Even though my family lives SE, I walk the many trails of the park almost every day and have three times walked all 30 miles of the Wildwood over a weekend. This park is part of my family, part of my epigenetic history, and part of the way I compose a life in this city.

From the personal to the ethical and legal, PGE's proposal first and foremost directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. It is insulting to think that PGE and perhaps members of our City Council do not think we as citizens know about these documents and that they were made with care and concerns for situations just like this. PGE's agenda does not get to trump the stated needs of a management plan that was authored with experts to guide the Forest into its future.

Also, PGE's Alternatives Analysis shows there are several possible locations outside Forest Park. This is just their most convenient one. Why do they consider this location 'possible' when it is against the stated management plan? This should have indicated that this is emphatically NOT a possible location. Again, very insulting and arrogant.

Finally, approval of this project will more than likely set a precedent for future phases of PGE's project and other development in Forest Park where big corps think that the rules and expectations of citizens and experts (forest managers) do not apply to them. This is very dangerous thinking that almost always has very deleterious on the land, creatures, and quality of life involved. This is NOT how we Should be thinking in Portland.

I am absolutely opposed to this appeal by PGE, and I expect that my city leaders will see it for what it is, which is another attempt by PGE to not have to work inside constraints that protect ecosystems, people, plants, animals, and places of solace.

Thank you - Linda K Johnson

***Be Kind. Be Safe. Take Care of One Another. Stand Up For Brown, Indigenous, Black and***

## ***Queer Lives***

***Linda K. Johnson, MA***

*(She/her/hers)*

Independent Dance Artist and Somatic Educator

Assistant Professor of Dance - Portland State University

Lindakjohnson.net

503.709.0952

## ***Ongoing***

Contemporary Alexander Technique

*Trio A* by Yvonne Rainer

thenewexplorers.com

*I am continually aware that I am living on and 'own' a home that is on unceded land in inner SE Portland previously occupied and elegantly cared for by Multnomah, Wasco, Cowlitz, Kathlamet, Clackamas, Bands of Chinook, Tualatin Kalapuya, and Molalla. These tribes made their homes along the Columbia River creating communities and summer encampments to harvest and use the plentiful natural resources of the area.*

**From:** [Stephenhayes](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Saturday, November 30, 2024 9:51:42 AM

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Dear Morgan Steele,

PGE's proposal to develop inside Forest Park concerns me greatly and for so many reasons personal to me. It is clear that the proposed powerline location blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan as well.

For example, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project and approving this project would set the precedent for future development in Forest Park. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.  
This is a slippery slope!

Forest Park is a precious resource, and we need to treat it as such. We need to recognize that PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. Do we really want to live with that result simply for expedience?

I implore you to reject PGE's proposal and defend the treasure that is Forest Park, leaving it for future generations to experience its unique magic for themselves.

Sincerely,  
Stephen Hayes

**From:** [Lucy Hill](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Proposal in Forest Park  
**Date:** Saturday, November 30, 2024 11:41:35 AM

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To: Morgan Steele November 30, 2024

From: Lucy Hill

RE: PGE proposal in Forest Park (LU 24-041109 CU EN GW)

Morgan Steele,

I am writing to you with my concerns about the proposal PGE has made to expand lines in Forest Park. I am deeply rooted in Portland, with my grandmother, Mom, myself, and daughters all born in Portland. I have many fond memories of hiking in Forest Park with family and friends. Forest Park has always been a wonderful place to escape the city and soak up the peaceful ambiance and diversity of the forest environment. Forest Park is a unique and treasured gift that must be protected and preserved.

The Forest Park Natural Resources Management Plan states "The plan presents and seeks to balance two goals: to protect Forest Park natural resources and to enhance Forest Park's recreation and educational resources." The management plan also states that Forest Park should not be disturbed unless there is no other possible alternative. The PGE proposal would clearcut old growth trees, and permanently destroy wetlands, streams, and habitat that support numerous species of flora and fauna in the first phase. PGE has in mind additional phases that would further destroy natural resources in Forest Park. This destruction is a direct violation of the Forest Park Natural Resources Management Plan. It has become clear that other alternative routes to PGE lines exist outside of Forest Park.

I strongly recommend the rejection of the PGE Proposal that would cut through and destroy natural resources within Forest Park. Forest Park must be preserved!

Lucy Hill

**From:** [Kristine Munholland](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#); [Ted Wheeler](#)  
**Subject:** PGE & Forest Park  
**Date:** Saturday, November 30, 2024 11:42:07 AM

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I am a 25 year resident of Portland. One of the first things I learned when moving here was that we have the largest forested area within city limits in the country. This resource is elite & should be protected at every turn. That does NOT include allowing PGE to devastate any of this magnificent ecosystem to its own ends, especially when alternate options exist. Please take this threat seriously.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Kimber Nelson](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Saturday, November 30, 2024 11:43:23 AM

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I am writing in concern regarding PGE's proposal to develop inside Forest Park. As a Portlander, I love Forest Park's huge natural area for recreating and knowing there is plenty of space and protection for plants and animals to live their whole lives there. As a nurse, I know how important every natural area in the city is to our physical and mental health.

PGE's proposal is concerning for several reasons.

1. PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. Old trees, and the ecosystem they support are increasingly rare and valuable, and we must continue to preserve old growth where it exists and support the development toward old growth where a mature forest allows that.
2. PGE's Alternatives Analysis shows there are several possible locations outside Forest Park. PGE and the City can do better than the current proposal.
3. Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park Concrete "Ask"

I ask you to reject PGE's proposal and work with them on alternative development options with lower environmental impact, and that preserve the treasure that is Forest Park.

Kimber Nelson  
7827 SE 66<sup>th</sup> Avenue  
Portland, OR 97206

**From:** [Laura Dunne](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Saturday, November 30, 2024 12:10:50 PM

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### **Draft Public Comment:**

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Laura Dunne

**From:** [Joachim](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment AGAINST the "Harborton Reliability Project" powerline expansion  
**Date:** Saturday, November 30, 2024 12:19:41 PM

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Hi PPD,  
How are you?

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

It is also scientifically proven that **city forests like Forest Park are reducing the summer temperatures. This will in turn reduce the electric needs for AC in the summer. Therefore reduce the need for additional powerlines.**

This of course is only true if the real reasons of PGE is: "to increase the reliability of the power demands for the residents of Portland".

But it is evident from the documents, that this project is only serving the few big customers.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, **PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan.**

**Please refuse PGE's land use permit.**

- I ask the PPD to reject the PGE proposal**
- and instead make PGE ask the few benefitting customers to pay for the more expensive alternatives.**

Thank you for your consideration.

Regards



Joachim, an avid nature lover and hiker

**From:** [Olivia Horgan](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Saturday, November 30, 2024 12:36:14 PM

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Dear Morgan Steele,

I live blocks away from Forest Park in NW Portland. I've hiked the trails hundreds of times over the 17 years that I've lived in the neighborhood. It's always a joy to see so many Portland residents of all ages out in the park.

I was shocked to learn today that PGE is proposing to cut a significant number of trees within Forest Park. It's unbelievable that the City of Portland would even consider this proposal.

The priority of the Forest Park Natural Resources Management Plan is to promote the forest to become an old growth forest. There are several alternative locations that PGE is considering - these must be fully explored. Approving this project sets a terrible precedent for future PGE use of Forest Park.

I urge you to reject PGE's proposal. Portland residents would never support cutting into our treasured park when reasonable alternatives exist.

Sincerely,

Olivia Horgan

2804 NW Savier St

Portland OR 97210

**From:** [Miles Wedemeyer](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Save forest park  
**Date:** Saturday, November 30, 2024 12:37:56 PM

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Hello

Please do not support Intel, they are colonists and we don't want them in our town. This land grab is honestly atrocious.

Forest park is one of the places that makes portland so unique, please do not compromise our values to support a giant company. This is not who we are

You have the power to stop this

Save our youth!

-Miles

**From:** [Miriam McCauley](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Saturday, November 30, 2024 1:06:35 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

I have a personal connection with Forest Park and have spent time with the trees and other more than human beings that reside there. I see many people of all ages visiting Forest Park and gathering on the trails. We must defend the wellbeing of these ecosystems and provide refuge for thriving habitats which foster community between humans and non humans. Please refuse PGE’s land use permit. Thank you for your consideration.

Miriam Saucedo  
Washington county resident since 2014, 5 miles from Forest Park  
Therapist at Reed College in Portland, OR

**From:** [Anne Buckley](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Anne Buckley](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Saturday, November 30, 2024 3:30:35 PM

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Dear Morgan Steele,

Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I - like many other Portlanders - can go to experience the natural world and hike a forest within our city limits. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is and how Forest Park contributes to our quality of life.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal!
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, it ignores alternative options outside of Forest Park and it would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife that depend on this area remaining undisturbed, the people, the city, and our future generations.

Sincerely,  
Anne Buckley

**From:** [ejbsegura@gmail.com](mailto:ejbsegura@gmail.com)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Saturday, November 30, 2024 3:47:45 PM

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Dear Morgan Steele,

Forest Park is a sanctuary unlike any other—a place where I and my hiking group, the Endorphin Drip Hiking Club, regularly connect with nature, each other, and ourselves. As a community dedicated to exploring and preserving the beauty of the Pacific Northwest, Forest Park holds special significance for us. Its towering trees and thriving ecosystems offer a rare and invaluable escape from urban life, reminding us of the interconnectedness of all living things.

PGE's proposal to develop inside Forest Park is deeply concerning. This project undermines the goals of the Forest Park Natural Resources Management Plan, which is meant to protect this vital space for generations to come.

- **First and foremost**, the proposal contradicts the NRMP's top priority of fostering an ancient forest. Cutting down mature trees to accommodate power lines not only hinders this goal but actively reverses decades of progress toward creating old-growth conditions.
- **Second**, PGE's own Alternatives Analysis identifies other locations outside Forest Park where this project could be implemented. These alternatives demonstrate that updating the power grid can and should happen without compromising Forest Park's delicate ecosystems.
- **Third**, approving this project sets a dangerous precedent for future development in Forest Park. PGE has already

indicated this is part of a multiphase project. Allowing this phase could pave the way for more habitat loss, tree removal, and environmental degradation.

Forest Park is more than just a natural area—it's a cornerstone of Portland's identity and an irreplaceable ecological treasure. As hikers, environmentalists, and stewards of this land, my community and I urge you to reject PGE's proposal.

Thank you for considering the voices of those who deeply cherish Forest Park and for prioritizing its protection.

Respectfully Sent,

Ernesto J. Segura

Endorphin Drip Hiking Club/Club President

**From:** [Kyna Rubin](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW. Opposed to PGE's proposal to clear trees in Forest Park  
**Date:** Saturday, November 30, 2024 4:24:43 PM

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Forest Park is one of the reasons I moved to Portland 13 years ago. I spend a lot of time on its trails because the trees, the quiet, and being surrounded by nature keep me physically and mentally healthy. To have a natural gem like Forest Park in the middle of an urban environment is exceedingly unique, but its location is what also makes it vulnerable. In the early 20th century a developer built what is now Leif Ericson Drive with the purpose of accessing new home subdivisions he would build on top of a hilly forest ecosystem. Road costs and landslides eventually scared off investors, and the builder abandoned the project, but not before he caused considerable creek and other ecological damage.

That history, and the fact that it took about half a century for advocates to create this area into Forest Park, means that we should be doing everything in our power to preserve it, not chip away at it. And, if nothing else, we urgently need more canopy and forest close to the city to help build our climate resilience.

This park isn't viable without protections, and PGE's proposal blatantly contradicts the Forest Park Natural Resources Management Plan's top goal--"to grow a self-sustaining ancient forest for the enjoyment and benefit of future generations."

I strongly urge you to reject this proposal. Instead, steer PGE to locate its lines outside Forest Park, per PGE's Alternatives Analysis options.

I fear that green lighting this proposal will set a precedent for future PGE project phases and for other deleterious development in Forest Park.

Sincerely,

Kyna Rubin

3232 NE 13th Avenue

Portland, Oregon



**From:** [Carlos Martin](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE FOREST PARK  
**Date:** Saturday, November 30, 2024 4:41:39 PM

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Absolutely Outrageous!!!!

**From:** [Jan Zuckerman](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Saturday, November 30, 2024 6:05:36 PM

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Dear Morgan Steele.

Forest Park is a treasure. During my 20 years teaching middle school in Portland, I took my students to forest park to connect them to the natural world and discover the magic of this unique ecosystem right in our city. Our monthly field studies at Forest Park included site monitoring, nature journaling, science inquiry and restoration projects. Just a few Trimet bus rides away, Forest Park became our second classroom and added to my students' well-being, physically and spiritually. Some of our favorite memories from school were cultivated at Forest Park. I am retired now and continue to spend time hiking and enjoying Forest Park. PGE's proposal to expand into Forest Park is unacceptable for so many reasons and must be denied.

Isn't the priority of the Forest Park Management Plan to support the forest in its succession to old growth? How would cutting down pristine, older trees and replanting somewhere else with saplings meet this goal? It takes decades to grow the kinds of trees that PGE proposes to cut down. Not only does a clearcut disturb the forest's ecosystem, it destroys mature tree habitat for wildlife.

What is to stop PGE from future development? They have stated that this is a multiphase project and therefore approval of their proposal sets a precedent for future development. With our changing climate, the urgent need to protect our urban tree canopy and especially forest park should and must outweigh this kind of development.

Hasn't PGE stated that there are alternative locations outside of Forest Park to locate this project? PGE must do its due diligence to study these alternatives. What are the costs to alternative routes vs the cost to our precious forest and to countless Portland residents who rely on Forest Park to help filter our water, clean our air, cool our city and provide beauty and peace in these very chaotic times?

We must continue to protect Forest Park for wildlife habitat and future generations of Portlanders who find solace in this very special place. Please deny PGE's proposal.

Thank you,  
Jan Zuckerman  
[janzuckie@gmail.com](mailto:janzuckie@gmail.com)  
2914 NE 18<sup>th</sup> Ave.  
Portland, Oregon, 97212

**From:** [Hannah Ungar](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comment  
**Date:** Saturday, November 30, 2024 7:48:52 PM

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### **Draft Public Comment:**

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [lynn.spitaleri.handlin](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Saturday, November 30, 2024 8:01:24 PM

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Dear Morgan Steele,

Forest Park is a true treasure. Habitat for wildlife, a place for humans to walk and recharge, sequesters massive amounts of carbon because of the old growth ecosystem, provides cooling shade, a place for ancient trees to thrive, cleans the air, helps to offset some of the hellish harm of the CEI hub, and so much more. Above and below Forest Park is of great value to all of us, even to those who do not realize its value, the people who want to cut many trees, PGE.

I love to walk in the forest, listen to the birds, the trees, the many scurrying critters. It brings me peace, and makes me feel a little bit hopeful about the future for our children and everyone's grandchildren and future generations.

Red Legged frogs are threatened in Oregon due in part to loss of habitat. I love the song of the Red Legged Frog, and I have spent hours sitting and watching them. The proposed clear cutting will destroy some of their habitat and make it harder or impossible to migrate to breed in the streams. Also, the clearcutting will harm the streams in the area and beyond which is a real bummer for these delightful little amphibians.

We, the City and Community have protected Forest Park for a long time now, though a blink in the life of some of its trees. I love the wide variety of fungi in the park.

When I first heard of PGE's plans to cut trees in 5 acres of the park I assumed it was someone's idea of a sick joke. But no, some folks at PGE want to cut the trees. This directly contradicts the top priority of the Forest Park Natural Resources Management Plan. Forest park is for trees, mature and old growth, and all the good things that come with that. PGE tries to minimize, saying it's just 5 acres, but that is a lot of habitat, many trees, and a lot of carbon sequestration and storage. It would disrupt wildlife beyond the acres cut. It would harm the streams outside of the 5 acres. The 5 acres do not exist in a bubble, they are part of a contiguous system of intertwined ecosystems. The harm will reverberate beyond the 5 acres. PGE has acknowledged that there are options outside of the park, they should use those options. Allowing this will just be the beginning, as this is a multi phase plan.

Please do not allow this to happen to our home. Do the right thing and reject PGE's proposal. Do this for the Forest, the City and the Community that you serve.

Thank you

Lynn Handlin, small business owner in outer SE Portland

**From:** [Harlan Shober](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Saturday, November 30, 2024 8:43:08 PM

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Dear Morgan Steele,

Forest Park is a place where people can easily access an old growth forest only minutes from downtown Portland. It's visited by an enormous number of people. Often, most of the trail head parking areas are full to capacity. My family and I have found comfort hiking the trails during excessively hot wether. It's been an oasis of cool, a reminder of our need for tree canopy. (Much of Portland's tree cover has been sacrificed to development. The resulting heat islands are a warning, a reminder of the value trees.) Forest Park is one of the very few stands of old growth remaining in our region. It should be diligently protected.

The terms of the Forest Park NRMP directly prohibit PGE's proposal. We can't grow an ancient forest if we dissect it. There's a lot of research showing that these places need to be contiguous, allowing for the intricate web of life under the surface, connecting root systems of many trees. Breaking this web does not protect or enhanced it. Really, you can't get much more self-evident than that. Any legalistic parsing that suggests that destroying enhances has the stink of regulatory capture all over it. Wouldn't you agree?

PGE's own analysis shows that they have alternative routings available. We are not obliged to bend our priorities and plans to save them money. Doing so would make it that much easier for the next exception seeker to chip away at a public resource.

Please Reject PGE's proposal.

Regards,

Harlan Shober

**From:** [Hannah True-Romero](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please deny PGE Land use permit!!  
**Date:** Saturday, November 30, 2024 11:13:43 PM

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Hello, my name is Hannah and I live and work in the Portland area. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Hannah T-R

**From:** [TERESA MCGRATH](#)  
**To:** [Steele, Morgan](#)  
**Subject:** forest park is special  
**Date:** Sunday, December 1, 2024 2:36:42 AM

---

dear morgan,

please read someone's comments, as we feel the same way.....

we hike there and appreciate its beauty...

"

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

old-growth forest.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project.

Third, approving this project could set the precedent for future development in Forest PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down

power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss."

please do the right thing

sincerely,

teresa mcgrath and nat kim

ne portland





**From:** [Maren Thomas](#)  
**To:** [Steele, Morgan](#)  
**Subject:** No Clearcuts in Forest Park!  
**Date:** Sunday, December 1, 2024 5:37:03 AM

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Morgan Steele,

Forest Park is a special and important place in the City of Portland. It provides a home to urban wildlife that is not replaceable and certainly not expendable. Forest Park's contribution to the ecological and spiritual health of Portland cannot be measured nor quantified. It is essential to the City as a space of living, breathing wild land.

PGE's proposal to develop inside Forest Park is concerning for so many reasons.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

A Concerned Citizen,  
Maren Thomas

**From:** [Max Allen](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please deny permit for Harborton Reliability Project  
**Date:** Sunday, December 1, 2024 6:26:34 AM

---

Good morning,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

On a personal note, I have lived in Portland for three years and Forest Park has quickly become a special place to me. I would be devastated if any amount of the park were clearcut for corporate interests.

I am strongly opposed to this project due to its ecological and economic impacts on Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Max Allen

**From:** [Van Pryor](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Opposing Harborton Reliability Project  
**Date:** Sunday, December 1, 2024 6:48:30 AM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

**This project is *not* for supporting energy needs of local communities, as PGE claims, but for supporting large tech companies like Intel on residential ratepayers’ dime.** PGE is focused on expanding transmission and energy generation infrastructure to meet the demand of rapidly growing industrial facilities, such as Intel’s new \$36 billion chip-making plant in Hillsboro, which would consume [roughly as much electricity as 50,000 homes](#).

**If this project is primarily to support Intel’s expansion, then it is fueling corporate expansion, colonial extraction, and genocide.**

In September 2024, the US paid Intel \$3 billion to produce microchips related to “national security” (microchips are used for various weapons systems and products of “war”). Intel’s plans to build a new microchip plant in Hillsboro is part of this contract.

The US has been sending billions of dollars worth of military aid to Israel to carry out its genocide in Gaza, and Intel’s plant would allow the US to send even more.

Intel is also one of Israel’s largest tech employers, operating primary centers for manufacturing, research, and development there. Intel has made commitments to invest billions of dollars in Israeli companies over the next decade, and Israel awarded Intel a multi-billion dollar grant to build a microchip manufacturing plant there, similar to the one they plan to build in Hillsboro.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Please don't leave this issue for the generations after us to clean up. Use your power and position now to stop this industrialization from spreading.

please refuse the permit,  
van hopper (ve/they)  
portland resident and forest park lover

**From:** [Susan Martin](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Subject: Re:LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 7:38:28 AM

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Dear Morgan Steele,

As a native Oregonian and native local resident I have grown up with Forest Park as a background to the city.

When I see Forest Park from a distance I am filled with pride for our city, that we value trees, nature and wildlife. Further, it is an additional source of pride to know that we have the largest natural park in the United States-that to me says a lot to who we are as Oregonians.

Though seeing Forest Park from a distance is a delight, entering it creates a sense of awe that we cannot experience when surrounded by brick, glass and concrete. There is an immediate quiet, a calming and slowing effect and a joy when walking on a natural surface. The sounds of cars and planes are muffled by the towering trees and replaced with the chorus of bird songs and the scolding chirp of a Douglas Squirrel. The forest is dense with plants never seen in a manicured lawn; it is amazing how diverse Oregon native plant species are and so many types of ferns! When I enter this natural world it becomes a part of me and I leave feeling present and joyful for days to come.

I am strongly opposed to PGE's proposal to develop inside Forest Park. This proposal blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan. This plan was developed to enable Forest Park to become an old growth forest.

1) PGE's proposal directly contradicts the goal for Forest Park to become an old growth forest. Cutting down mature trees does not align with this goal.

2) Approving PGE's proposal could set precedent for future development inside Forest Park.

3) PGE's own analysis has shown that there are alternative locations outside Forest Park for its project. There is even the possibility of updating the power grid without impacting Forest Park.

Morgan, we have the power to preserve this forest or the power to destroy a portion of this forest that provides home to hundreds, if not thousands, of birds, invertebrates and mammals. This portion of the forest keeps the streams cooled in the summer and warmed in the winter for our wildlife that depends on these streams. Forest Park, and the large swath of land proposed to be cut down by PGE, helps clean our polluted city air and helps regulate the rising temperatures experienced worldwide. This forest took many hundreds of years to grow and develop, to create the special ecosystem that now supports protected species, including the red-legged frog. Once cut it is permanently gone, as is the ecosystem these trees support.

Please decide to protect our forest rather than allow it to be destroyed and reject PGE's proposal.

Thank you,  
Susan Martin  
Milwaukie Oregon resident and native Oregonian

**From:** [Susan Bennett](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 7:52:03 AM

---

Dear Morgan Steele:

I am very concerned about PGE's Harborton Reliability Project, which would cut 4.7 acres and fill in two wetlands in Forest Park.

I am 83 years old and try to hike once or twice every week. My balance and strength are not what they used to be, so I need trails that are well-maintained and not too steep. I enjoy looking beyond the trail I am on at forest, streams, and wetlands, and feeling remote from the city. I do not enjoy hiking near power lines. Thus Forest Park is a magical gift for me right in the city where I live - a gorgeous forest with old growth trees and good trails that allow me to hike safely as far as I can. I especially enjoy the northern part of the park because it feels more remote and has fewer other hikers.

Also I have children and grandchildren who live in the Portland area, and they too value Forest Park. I want this beautiful forest to be here for them long after I am gone.

On a larger scale, I am concerned about the welfare of the planet. The planet is at risk of becoming unliveable for people. I do not want to see my children and grandchildren trying to live on a barren planet. We need to do whatever we can to protect the forests and wetlands the planet needs. Forest Park by itself will not save the planet, but it makes a valuable contribution.

Specifically in regarding PGE's project:

- 1) The project is not in accord with the Forest Park Natural Resources Plan, of which the top priorities are to manage the forest towards old growth and to provide a resource for education and recreation. Cutting 4.7 acres of mature trees and filling two wetlands is not mitigated by replacing them with monoculture oaks which take 100 years or so to mature and doing other enhancements elsewhere in the park. It would remove 4.7 acres from educational and recreational uses for a long time if not forever.
- 2) PGE has identified other possible locations outside Forest Park.
- 3) This project sets a precedent for intrusions into the park, not only for PGE but also for other developments.
- 4) PGE has not been transparent. It withheld information about other possible locations outside Forest Park until October of this year. The project has been described as having multiple phases, but PGE has not disclosed what future phases might entail. PGE has not meaningfully incorporated community feedback into its plan. This raises doubts about its stated goal of community resiliency.

We in Portland are fortunate to have this resource in our city, unique among cities in this country, and need to do everything we can to protect it for future generations.

Sincerely,

Susan Bennett  
4613 NE Killingsworth Street  
Portland

**From:** [Susan C Hay](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Deny PGE Land Use Permit - Protect Forest Park!  
**Date:** Sunday, December 1, 2024 8:28:18 AM

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To Morgan Steele, Environmental City Planner:

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

This is particularly personal to me. As a long term Portland resident, Forest Park is what I (and I know many others) consider sacred space. Not only do I hike and run there regularly, I am now an active Independent Volunteer with Forest Park Conservancy, where I work on the trails and on habitat restoration.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Susan Hay



**From:** [Mark Darienzo](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 8:34:35 AM

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Dear Morgan Steele

Forest Park is a special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project.

Third, approving this project could set the precedent for future development in Forest Park. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss.

Please reject PGE's proposal.

Sincerely,

Mark Darienzo

**From:** [Catie Olson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project public comment  
**Date:** Sunday, December 1, 2024 9:11:43 AM

---

To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE'S data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

Catie Olson

**From:** [Julia Scott](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project  
**Date:** Sunday, December 1, 2024 9:36:04 AM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Julia Scott

**From:** [Jan Mills](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 9:42:39 AM

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I was born in Portland and have hiked in Forest Park my entire life. It is one of the things that makes Portland, so unique, beautiful and restorative.

PGE's proposal is concerning to me as it is not in line with the intent of the founding documents.

1. PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.
2. PGE's Alternatives Analysis shows there are several possible locations outside Forest Park.
3. Approval of this project could set a precedent for future phases of PGE's project going forward.

Please reject this PGE proposal.

Thank you,  
Jan Mills  
2514 NE Mason St  
Portland 97211

**From:** [Shawn Looney](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Resilience Public comment  
**Date:** Sunday, December 1, 2024 9:43:49 AM

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Dear Morgan,

I'm adding my voice to the many who have already contacted you with concerns about PGE's plans to cut approximately 5 acres of trees in Forest Park. The most salient factors:

- PGE's proposal is in direct conflict with the top priority of Forest Park Resources Management Plan: Manage the forest towards old growth.
- PGE's alternative analyses that look outside of Forest Park appear not to be fully explored, and in effect have been rejected out of hand—perhaps to save money.
- Approval of this project no doubt sets a precedent to cut further routes through the park in future phases of PGE's expansion plans.

Forest Park is an incredible resource in our backyards, and is one that thousands of people, both Portlanders and others, enjoy year around. If the City allows entities to whittle away at it now, the precedent it sets will ultimately degrade this precious resource.

Thank you,  
Shawn Looney  
Linnton resident

**From:** [Lana Ferris](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** PGE power line expansion  
**Date:** Sunday, December 1, 2024 9:50:50 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,  
Lana

Error Icon

Address not found

Your message wasn't delivered to [morgan.steele@portland.or.gov](mailto:morgan.steele@portland.or.gov) because the domain portland.or.gov couldn't be found. Check for typos or unnecessary spaces and try again.

[LEARN MORE](#)

The response was:

DNS Error: DNS type 'mx' lookup of portland.or.gov responded with code NXDOMAIN

Domain name not found: portland.or.gov For more information, go to

<https://support.google.com/mail/?p=BadRcptDomain>

Show quoted text

**From:** [Charley Erickson](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Forest park  
**Date:** Sunday, December 1, 2024 11:55:53 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Charley Erickson

Sent from my iPhone

**From:** [Herb Fyfield](#)  
**To:** [Steele, Morgan](#)  
**Subject:** RE: LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 12:05:27 PM

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Dear Ms. Steele,

Forest Park is important to me as a lifelong birder, amateur biologist, hiker and long distance walker. My colleagues, friends, family and I spend many hours a week in Forest Park. The park is a living sanctuary for both humans and innumerable communities of wildlife, plant life and other living things.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Thank you

--

Herb Fyfield | [503.539.6373](tel:503.539.6373)



**From:** [Ashlyn West](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment  
**Date:** Sunday, December 1, 2024 12:05:55 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit. Thank you for your consideration.

Ashlyn West, MS, LPC  
Washington county resident

**From:** [Linda Magnuson](#)  
**To:** [Steele, Morgan](#)  
**Subject:** :LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 12:24:39 PM

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Dear Mr Steele,

Portland is committed to letting Forest Park be an old growth forest. This is as it should be. This is a very important part of our city. It's unthinkable to cut trees. PGE has alternatives.

1. PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.
2. PGE's Alternatives Analysis shows there are several possible locations outside Forest Park.
3. Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park

Concrete "Ask": Reject PGE's proposal

Cordially,

Linda Magnuson  
4346 NE Skidmore  
Portland, OR 97218

**From:** [Mark Holenstein](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment for PGE's Forest Park Clearcut  
**Date:** Sunday, December 1, 2024 12:30:21 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by the Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. With the urgency of the climate crisis, the City of Portland should be protecting our old growth tree canopies which provide relief to our most vulnerable species.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro, including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

**I am strongly opposed to this project due to its ecological and economic impacts on myself, other Portland residents, native species, and future generations. I am urging you to please refuse PGE's land use permit.**

Thank you for your time and consideration.

Mark Holenstein  
He/Him

**From:** [Amanda Byrne](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment for PGE's Forest Park Clearcut  
**Date:** Sunday, December 1, 2024 12:32:59 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by the Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. With the urgency of the climate crisis, the City of Portland should be protecting our old growth tree canopies which provide relief to our most vulnerable species.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro. including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

**I am strongly opposed to this project due to its ecological and economic impacts on myself, other Portland residents, native species, and future generations. I am urging you to please refuse PGE's land use permit.**

Thank you for your time and consideration.

Amanda Byrne  
She/Her

**From:** [Mike Lindberg](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Mike Lindberg](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 12:33:57 PM

---

Dear Morgan , I am opposed to PGE.,s plan to run transmission lines through Forest Park. PGE,s proposal directly conflicts the criteria in the Forest Park Natural Resources Plan . I was on the City Council when this was adopted. I am certain that this proposal violates the plan .  
Also if the project can be built outside the park it should be built outside the park . The FPNRP is clear on this point . PGEs own analysis shows that there are alternatives.

During my 17 years on the City Council Forest Park was my number one go to place for hiking . Let's preserve it and follow the law .

Sincerely , Mike Lindberg  
Sent from my iPhone

**From:** [eph freese](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please deny PGE's land use permit  
**Date:** Sunday, December 1, 2024 12:51:27 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

Forest Park is such a gift. I've spent countless hours there and I'd hate to see it continuously chipped away at. As much as I like to avoid slippery slope thoughts, many times of have watched development and utility companies treat our forests and portland parks with disposability over the years, all while continuing outrageous price hikes — I think many of us are right not to trust PGE with the best interests of our lands and our people.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE's land use permit. I pray for our collective commitment to people and healthy ecosystems over corporations.

Thank you for your consideration.

Ephraim Freese  
Multnomah County Resident  
East West College of the Healing Arts

Sent from my iPhone

**From:** [Ken Yoshikawa](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Refuse the Harborton Project  
**Date:** Sunday, December 1, 2024 1:23:25 PM

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To Morgan Steele and Christine Caruso,

In addition to the following message, I say that as a long time Portland resident, what gives Portland its essential spirit is the city's handling of our parks and natural environs. If we are to transgress upon this relationship the very thing that gives Portland its unique vibrancy as a city will begin to diminish as we set the precedent that such grabs for domination by corporate interests are in any way acceptable. Deny the Harborton 'Reliability' Project and become reliable representatives to the residents of Portland, people who love this city and who love the beauty of our forests: the air, the ecology, the birds, the life.

It may seem disposable to you, but it would be an irredeemable harm to Forest Park. Thank you,

Ken Yoshikawa

To continue:

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Ken Yoshikawa

**From:** [Darcie Meihoff](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 2:30:00 PM

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To whom it may concern: As a native Oregonian and past board member/president of the Forest Park Conservancy (FPC), Forest Park holds a special place in my heart. For decades, my family and I have enjoyed hiking its many miles of trails, and we've fought long and hard to protect and help bring Forest Park back to health. The effort is more than worth it: Where else can the treasures of our region-mature forests, streams and wildlife-be found so close to downtown for the benefit of so many?. At a time when people desperately need closer connections and ties to nature for their physical and mental health, and Portland is battling to re-build and repair its reputation as a clean and liveable city, the very notion that Portland is actually entertaining PGE's proposal to take a portion of Forest Park to destroy/develop it is nothing short of criminal and short-sighted.

In light of climate change, increasing population pressures and Portland's terrible urban heat gain and air pollution index especially in the summer, we need the tree canopy and the natural sanctuary that Forest Park provides now more than ever. Allowing PGE to cut down irreplaceable 150 year-old trees and destroy acres of threatened natural habitat that depends on them sets a horribly dangerous precedent and ***directly contradicts*** the top priority of the Forest Park Natural Resources Management Plan. There's no environmental mitigation plan in the world that will offset the damage PGE will do by killing old growth trees and destroying native streams and habitat in the process.

As city leaders, it is your duty to protect what makes Portland and our region special, liveable, and act in the best interests of the public, not bow to special interests like utilities looking for shortcuts and are willing to lay waste to the very things Portland area citizens hold most sacred. PGE's own analysis has shown there are several project alternatives that do not involve confiscating land from such a beloved natural area. They can update their power grid without impacting Forest Park at all and the city should hold them accountable to ensure they prioritize those other options. Because what they are proposing for the Harborton "Reliability" Project is in direct conflict with the Forest Park Natural Resources Management Plan, this isn't just a shameful disregard for one of Portland's most sacred natural treasures, it doesn't even appear to be legal. Most frightening of all is that they don't intend to stop the destruction; PGE has already stated that this is a multiphase project, with more phases of development targeting Forest Park to come and with that, more harm to trees, streams and clean water, fish and wildlife.

For the sake of the many thousands of people who love and benefit from Forest Park in so many ways as well as the many species who call it home, I ask you to not only reject PGE's proposal but do more to expand and strengthen protections for Forest Park, to help shield it from these types of threats so that future generations may know and benefit from its wonders that in their wisdom, our past and hopefully future leaders decided to protect rather than destroy.

-Darcie Meihoff  
Past Forest Park Conservancy board member/president  
Current Oregon Wild board member/secretary  
841 S. Gaines Street #305, Portland, Oregon



[darciepdx@gmail.com](mailto:darciepdx@gmail.com)  
971-998-3782

**From:** [Chelesa Mayer](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** DO NOT CLEAR CUT FOREST PARK  
**Date:** Sunday, December 1, 2024 2:37:11 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Chelesa Mayer

--

Chelesa Mayer, DPT

**The Ren Clinic**

**4424 NE Glisan Street**

**Portland, OR 97213**

<http://therenclinic.com/your-visit/schedule/>

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**From:** [Sylvie Johnson](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Deny Harborton Reliability Project Permit  
**Date:** Sunday, December 1, 2024 3:24:37 PM

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Hello,

As a born and raised Portland resident, I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. I am currently a senior Geography student at the University of Oregon, where I have taken many classes on ecology and environmental processes. Breaking up this habitat goes against everything I have learned in my time there. Please do what you can to protect our local ecology, one of the many things that makes Portland so special.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sylvie Johnson

**From:** [John Meihoff](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 3:27:19 PM

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To whom it may concern:

As an avid Forest Park trail user/runner, I'm writing to express my opposition regarding PGE's proposal to develop a portion of Forest Park. Forest Park is an incredibly special place. Nowhere in the Portland area-and in no other urban area located so close to the heart of a downtown area-can you enjoy the peace, solitude and recreation opportunities that Forest Park affords.

That's why PGE's proposal is so concerning. Once we develop natural areas like Forest Park, they are gone forever. The idea that PGE would raze a significant portion of Forest Park, one of the most beloved natural treasures in Portland, cut down some of our last remaining old growth trees and destroy precious and rare natural habitat is incredibly disturbing for many reasons, including:

- Their proposed actions directly contradict the top priorities in the Forest Park Natural Resources Management Plan, which is to manage the forest for old growth. With climate change increasingly threatening our forests, watersheds and wildlife species, this has become an even greater priority than when the plan was first drafted.
- PGE isn't being forthright in presenting their alternative analysis, which shows that there are other locations outside of Forest Park that they can consider for this project. Rather than cause irreparable environmental damage to the Park that threatens clean water, air and wildlife habitat, the city should insist that these alternatives be prioritized.
- If PGE is allowed to develop and destroy sections of Forest Park at will, it sets a horrible precedent. PGE has revealed that they won't stop, and that future phases will literally pave the way for even more development.
- We need to expand our natural areas and do more to protect them, not shrink them. With a growing population, generations losing their connection to nature and fewer places to recreate outdoors near urban areas that are accessible to diverse communities, places like Forest Park are irreplaceable and invaluable.

Forest Park is an amazing treasure - it is one of the main reasons Portland has earned a reputation for liveability. From its incredible trail system to its positive impacts on clean air, water and wildlife habitat, we urge the city to put a stop to this terrible proposal and prioritize/protect Forest Park. Act now and reject PGE's Harborton Reliability Project: It's bad for Forest Park, Portland and everything we hold dear.

Signed,  
John Meihoff  
841 S. Gaines Street, Portland, Oregon 97239  
[meihoffj@gmail.com](mailto:meihoffj@gmail.com)

**From:** [Kelsey Luna](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please refuse PGE's land use permit  
**Date:** Sunday, December 1, 2024 3:40:42 PM

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*Dear Morgan Steele,*

*I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.*

*The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.*

*Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.*

*I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.*

*Kelsey Luna*

**From:** [River Lyons](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park!  
**Date:** Sunday, December 1, 2024 3:54:41 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

River Lyons

**From:** [Lauren Mosman](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Please deny the Harborton Reliability Project permit  
**Date:** Sunday, December 1, 2024 4:31:07 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor. Removing trees is the exact opposite direction in which we need to move as global citizens.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration,  
Lauren Mosman  
9231 SW 3rd Ave  
Portland, OR 97219



**From:** [samantha becker](#)  
**To:** [Steele, Morgan](#)  
**Date:** Sunday, December 1, 2024 5:04:27 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Alexander Hagg](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment - Al Hagg - LU 24-041109 CU EN GW - PGE Expansion @ Forest Park  
**Date:** Sunday, December 1, 2024 5:10:07 PM

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Good Afternoon, my name is Al Hagg, a resident of Portland Hazelwood neighborhood, user of Forest Park, PGE utility user, active community member with SOLVE, East Portland Tool Library, DePave, Friends of Trees, The Nature Conservancy, PNW Search & Rescue, Friends of Mt. Tabor, Friends of the Gorge, Johnson Creek Watershed Council, Bird Alliance of Oregon, etc.

I am writing to urge PP&D to deny the land use permit currently being sought by PGE for the "Harborton Reliability Project" powerline expansion.

Forest Park is a vital natural resource area. And as the City previously noted, the proposal would cause significant impacts to this resource area, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

After reviewing the Forest Park Natural Resource Management Plan, I believe that the proposal is directly in conflict and antithetical to the intent of this management plan.

I have concerns about the proposal's necessity, and think that more study, justification and transparency is needed from the applicant, as information being supplied by activist groups indicate that the driver for this expansion is industrial growth. It's obvious then that the beneficiaries of this proposal, industry like Intel etc., and the utility provider PGE, would greatly benefit from the proposal, yet bear little to none of the effects of the proposal impact, which the general Portland public, and the Forest Park habitat, would bear. This inequity is concerning.

After reviewing the mitigation, it seems greatly inadequate, and take decades to reach equivalent ecosystem strength as the impact.

Additionally, I believe that not all alternatives to the proposal have been evaluated, and that the provided alternatives, including the 'no action' alternative, are preferable to the proposal.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Best,

Al

--

Al Hagg  
708-703-2719  
Portland, Oregon

**From:** [Dorothy Buckley](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 5:15:09 PM

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I am a 79 year old native Oregonian. I have always been extremely proud of my state for its gorgeous scenery, beautiful forests, and the state's conservation efforts. However, I'm very disheartened to see what is happening to Portland.

One of the saddest threats to Portland currently is the extremely unwise proposal to allow PGE to destroy a portion of our treasured Forest Park.

Please do not allow this to happen PGE has alternatives instead of this precious location.

Our city's government has a duty to care for Portland's citizens, and their rights to clean air, water and livability. With the huge global warming crisis only getting worse, this of utmost importance.

Do not allow industry to ruin the reasons Portland is such a special place to call our home.

Sincerely,

Dorothy Buckley

**From:** [sheila.keane](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 5:36:09 PM

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Dear Morgan Steele,

I am writing as a long time resident of Portland.

When I first moved to Portland, I was amazed that such a large and wild park would exist within the city limits. Though I lived on the east side, and worked downtown, I would frequent the park weekly either before or after work - walking or running the trails. Each outing allowed me to prepare for the day ahead or decompress from the one just finished. The trees that filter our air and streams that provide fresh water to wildlife were not lost on me. I have grown to know the park and every single trail very well. Several years ago I began volunteering in the park. It is my way of giving back to a community (and past elected officials) that have supported and loved the park for so long.

In the mid 1990's, when the City Council passed the Forest Park Natural Resources Plan (FPNRP) to create an old growth forest, I was greatly relieved - not only for myself but for all the others (present and future) who would have access to this beautiful park and its ecosystems and not worry about losing it to utility industries or developers.

PGE's proposal, if passed, is in direct violation of the FPNRP and particularly its top priority - to create an old growth forest. This plan was crafted and passed nearly 30 years ago.

I am also alarmed and deeply concerned that PGE, in spite of having alternative locations to place their expansion, has chosen Forest Park which includes clear cutting 5 acres of mature forest and laying down live power lines. The fact that multiple locations are being considered points to PGE's awareness that the power grid expansion can be updated without impacting any of Forest Park.

If this expansion project is approved, I am certain this will only be the beginning of expanding further into Forest Park and clear cutting more trees and disrupting/annihilating more native habitat. PGE has acknowledged this project is a multi-phase one.

I am asking that you reject PGE's expansion request into Forest Park. Their proposal is directly in violation of the 30 year old natural resource plan. Please, help all of us continue to benefit from the beauty, expanse and contributions Forest Park provides for all of the community of Portland by denying PGE's application.

Respectfully,  
Sheila Keane

**From:** [Kate Whitty](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please refuse PGE's land use permit  
**Date:** Sunday, December 1, 2024 6:13:12 PM

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Hello Morgan,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Kate Whitty, Portland, Oregon resident

**From:** [Ariana Harley](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** For the love of trees and Forest Park  
**Date:** Sunday, December 1, 2024 6:35:07 PM

---

As a fourth generational Portlander,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Ariana Harley  
she/her  
971.533.5789  
[ariana@arianaharley.com](mailto:ariana@arianaharley.com)  
Support your health with Essential Oils  
[www.mydoterra.com/arianaharley/](http://www.mydoterra.com/arianaharley/)

“Don’t you know yet? It is your light that lights the worlds.” Rumi

**From:** [-cactus-](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 7:00:54 PM

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Dear Morgan Steele,

I arrived in Portland six years ago, taking a sales position in a high tech engineering manufacturing company. I soon discovered Forest Park. And as I settled into my new job, and I began to experience the stress of the fast-moving, competitive environment, Forest Park became my haven away from the stress and worry — a place to relax and reset.

Access to Forest Park helped me cope with a stressful job.

Like many visitors, I am refreshed in the company of the old firs, lifted by the trickle of the stream and rustle of wind in the trees, renewed by simply walking in the park. And as I have come to rely on the beneficial effects of Forest Park, I have grown aware of the dangers the park faces in terms of human impact.

I ask you to reject PGE's proposal because it will degrade the very special and unique thing that makes Portland a place people want to live and visit. Ask PGE to come back with a better plan.

1. The PGE proposal squarely contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.
2. The PGE proposal underplays the Alternatives Analysis, which identifies locations outside Forest Park.
3. The PGE proposal opens the gate to a series of future phases of development in Forest Park.

PGE needs to hear the community roundly reject this version of the proposal to help them drive internally for a more sustainable solution, more in line with their own corporate goals. A solution that respects the integrity of Forest Park by going around. A solution that preserves the forest vibrancy and health by leaving it alone.

Best regards,  
cactus may  
Portland resident since 2018

**From:** [Kieran Hanrahan](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 7:15:19 PM

---

Hello,

As a botanist, I have significant concerns about PGE's proposed Harborton Reliability Project. The Harborton site is a gem of remnant oak woodland and a last redoubt of local floral biodiversity. I believe the HRP poses a significant threat to the biodiversity of Forest Park and the city more broadly.

In its finding that PGE's application for review of the Harborton Reliability Project was incomplete, the Bureau of Development Services noted that the HRP conflicts with the Forest Park Natural Resources Management Plan's first Conservation Goal: "Protect Forest Park's native plant and animal communities, and its soil and water resources while managing the forest ecosystem in order to grow a self-sustaining ancient forest for the enjoyment and benefit of future generations." I argue that the HRP also threatens the NRMP's *second* Conservation Goal: "Design management and restoration efforts to **maintain and enhance regional biodiversity**, provide wildlife habitat and migration opportunities, improve water quality and aquatic habitat, and repair damaged and fragmented natural ecosystems." The HRP likewise conflicts with the goal for Forest Park's oak woodland stated in the 2011 Desired Future Condition plan for Forest Park to "Maintain and expand existing acreage through enhancement and/or acquisition." Oak woodlands are identified as a "Special Status Habitat" that warrant protection in the city's 2011 Terrestrial Ecology Enhancement Strategy.

To understand the magnitude of the threat posed by the HRP, we must understand the history of Portland's floral biodiversity. According to the Oregon Watershed Enhancement Board, around 90% of the state's oak habitat has been lost since the 1800s (<https://www.oregon.gov/oweb/Documents/FIP-Oak-Woodlands-Priority.pdf>). The same has occurred locally in Portland, where prairie, savannah, and woodland that once grew in significant chunks of the city east of the Willamette have been converted to residential and industrial use. Researchers with the Oregon Biodiversity Information Center pieced together historical data to map the historic vegetation regimes of the Willamette valley, including Portland. These maps show large areas of land once supported these vegetation classes along the Columbia River and in what is now inner Southeast Portland ([https://www.fsl.orst.edu/pnwerc/wrb/Atlas\\_web\\_compressed/4.Biotic\\_Systems/4b.presetveg\\_web.pdf](https://www.fsl.orst.edu/pnwerc/wrb/Atlas_web_compressed/4.Biotic_Systems/4b.presetveg_web.pdf)). According to thousands of herbarium records assembled by the authors of the 2009 report *Urbanizing Flora of Portland, Oregon, 1806-2008*, these areas supported dozens of plant species that have since been extirpated from the city, and some that have been extirpated from the Metro area at large ([https://ir.library.oregonstate.edu/concern/technical\\_reports/j6731792?locale=en](https://ir.library.oregonstate.edu/concern/technical_reports/j6731792?locale=en)).

While prairie and savannah arguably no longer exist within the city outside of small restoration projects, remnant patches of oak woodland persist in Oaks Bottom, along the bluff in the Overlook and University Parks neighborhoods, and on a slim strip of land at the eastern of Forest Park. It is in the most exemplary part of that slim strip of remnant oak woodland in Forest Park where PGE wants to site its Harborton Reliability Project. This site also happens to be, in my opinion, the most intact patch of remnant oak woodland in the city. The woodland in Oaks Bottom and along the bluff in Overlook are both crowded with state-recognized listed noxious weeds and other invasive plant species and have lost much of their original biodiversity. The oak woodland present at the Harborton site features fewer invasive species, less invasive vegetation overall, and harbors more plant species that are rare or uncommon for the city and the metro area.

The 2011 Desired Future Condition plan for Forest Park recognizes the presence of several plant species at this site that are now uncommon in the Portland Metro Area, namely oval-leaved viburnum (*Viburnum ellipticum*), crevice alumroot (*Heuchera micrantha*), and low snowberry (*Symphoricarpos mollis*). All three are species associated with oak woodland. However, the DFC does not mention the presence of three other uncommon species at the site: coastal woodfern (*Dryopteris arguta*), brittle bladderfern (*Cystopteris fragilis*), Pacific sanicle (*Sanicula crassicaulis*), each of which I have observed growing there personally (<https://www.inaturalist.org/observations/230603210>, <https://www.inaturalist.org/observations/196066996>, <https://www.inaturalist.org/observations/203536163>). While coastal woodfern does occur along the bluff in Overlook and University Park and elsewhere in Forest Park, and brittle bladderfern grows elsewhere in Forest Park and at Mt. Tabor, this is the only documented remaining population of Pacific sanicle in the city. Unlike the other locally uncommon species listed here, as far as I am aware, Pacific sanicle is not currently available for wholesale purchase in seed or plant form, making replacing this population if destroyed during development difficult. Lastly, while I have seen them growing near but not at the site, others have observed beautiful and locally rare Oregon fawn lilies (*Erythronium oregonum*) growing there (<https://www.inaturalist.org/observations/42969776>). There may be even more locally rare plants growing at the site, which to my knowledge has never been the subject of a dedicated species inventory.

Of course, these plants are just part of a broader ecosystem. Many advocates have raised concerns about the impact of the HRP to the state-sensitive northern red-legged frog. In addition, observers have spotted two non-listed but locally uncommon animal species on or near the site: the porcupine and the northern alligator lizard (<https://www.inaturalist.org/observations/175735661>, <https://www.inaturalist.org/observations/20799506>). Together, the plant and animal species that occur in the oak woodland at the Harborton site are a critical part of the regional biodiversity of Forest Park and the city that the NRMP seeks to protect.

These species are threatened not only by this phase of the HRP, but also by future phases that PGE has only begun to plan. I am particularly concerned about the consequences of repeated disruption to this area that would be caused both by multiple phases of development and by ongoing maintenance of vegetation under the new lines once they are built. The outcomes of PGE's maintenance practices underneath its power lines are obvious just up the trail from the Harborton site. While PGE has done an admirable job planting native plants that support pollinator species under its lines there, the area is still choked with at least 30 non-native plant species, many of which are state-recognized noxious weeds. These include:

- Ivy (*Hedera helix/hibernica*, Class B noxious weed)
- Scotch broom (*Cytisus scoparius*, Class B noxious weed)
- Himalayan blackberry (*Rubus armeniacus*, Class B noxious weed)
- Shining geranium (*Geranium lucidum*, Class B noxious weed)
- Herb-robert (*Geranium robertianum*, Class B noxious weed)
- St. John's wort (*Hypericum perforatum*, Class B noxious weed)
- Tansy ragwort (*Jacobaea vulgaris*, Class B noxious weed)
- Bull thistle (*Cirsium vulgare*, Class B noxious weed)
- Canada thistle (*Cirsium arvense*, Class B noxious weed)
- Broad-leaved sweet pea (*Lathyrus latifolius*, Class B noxious weed)
- Common tansy (*Tanacetum vulgare*)
- Bird's-foot trefoil (*Lotus pedunculatus*)
- Lesser burdock (*Arctium minus*)
- Wild cherry (*Prunus avium*)
- Nipplewort (*Lapsana communis*)
- Foxglove (*Digitalis purpurea*)
- Groundsel (*Senecio vulgaris*)
- Wall lettuce (*Mycelis muralis*)
- Creeping buttercup (*Ranunculus repens*)
- Yellow glandweed (*Bellardia viscosa*)
- Ox-eye daisy (*Leucanthemum vulgare*)



- Broad-leaved dock (*Rumex obtusifolius*)
- Queen Anne's lace (*Daucus carota*)
- Greater plantain (*Plantago major*)
- Ribwort plantain (*Plantago lanceolata*)
- Prickly lettuce (*Lactuca serriola*)
- Deptford pink (*Dianthus armeria*)
- White clover (*Trifolium repens*)
- Red clover (*Trifolium pratense*)
- Chicory (*Cichorium intybus*)

These species are absent from or present in lesser amounts on the proposed HRP Site, which has experienced far less disturbance than the area under the PGE right-of-way that has been clearcut. These plants are problematic because they outcompete and take over the habitat of native plants. While it is possible over decades and centuries to replace the trees damaged or removed by development of the HRP's multiple phases, it may never be possible to replace the habitat offered to forbs (non-woody plants) once it is overtaken by vigorous non-native weeds that require aggressive and sometimes destructive measures to control.

With over 90% of oak habitat in the state already lost to development and much of what remains in the city compromised by invasive species, I am shocked that PGE is not considering alternatives to the HRP. I strongly oppose the approval of the HRP, as I believe it incompatible with NRMP and DFC for Forest Park, and with the city's TEES beyond Forest Park.

However, if the HRP is allowed to proceed, I believe it should be only with the following stipulations attached:

1. PGE must first complete a species inventory of the development site for vascular and non-vascular plants and animal species. This inventory should be conducted through multiple surveys over the course of a year to ensure surveyors find species through different stages of growth and do not miss ephemeral or migratory species that may not be visible or present at certain times of year.
2. PGE must commit to maintaining the original floral biodiversity of the site by restoring it after construction with locally sourced plants or seeds of species identified by the inventory. This will ultimately support animal diversity as well.
3. PGE must commit to indefinitely controlling state-recognized noxious species and other invasive species at the development site in a manner that does not threaten the viability of locally uncommon native plant populations there.
4. PGE must re-survey the site periodically after development to ensure that planted species take and that state-recognized noxious weeds and other invasive species are not introduced or spread.

These stipulations are not intended to be all-inclusive; other experts and advocates may suggest additional restrictions that are specific to their areas of expertise.

Thank you,  
Kieran Hanrahan  
Board Member, Native Plant Society of Oregon, Portland Chapter

**From:** [Natalie Daly](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Defend Forest Park  
**Date:** Sunday, December 1, 2024 7:33:44 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Forest Park has been a place of great importance to me through many struggles, providing the healing of nature and community with fellow residents of the Portland area. These areas need to be protected and be allowed to thrive to continue to inspire connection and well being for all those who visit. Please refuse PGE’s land use permit. Thank you for your consideration.

Natalie Daly  
Washington County resident

**From:** [Nanao Carey](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Don't clear out Forest Park  
**Date:** Sunday, December 1, 2024 8:40:37 PM

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Hi!

I live in St Johns and i regularly walk on the trails in the northern part of Forest Park. I decided to live in this neighborhood because of the proximity to the park. It's never acceptable to clear out the forest when we need to make sure we have to have trees to combat the climate changes and heat waves. No, I'm not happy with this project. Stop it

Nanao Carey  
850-300-1455

**From:** [Carmen Bango](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 8:50:27 PM

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Dear Morgan Steele,

Forest Park is what makes Portland such an incredible space; there is no other city where a forest of hiking and running and walking trails are as accessible. For me, forest park has been a safe haven, a way to explore, escape, and make great friends all while running from my home. As a busy graduate student, I would never have time to drive to nature if living in another city. I never take this space for granted, and I feel so lucky to be so close to forest park. I wish that everyone could experience it.

PGE's plan to develop inside Forest Park is both so scary and heartbreaking to hear. It also blatantly fails to meet most of the criteria for development laid out by the forest park natural resources management plan. In the face of the changing politics in our country deprioritizing national parks, forest lands, and climate change action, PGE's mission feels especially terrifying, especially as this is a multiphase project.

This park means so much not only to me, but to so many of my friends and acquaintances, past, present and future. I urge you to reject PGE's proposal.

Sincerely,

Carmen Bango

**From:** [Maxwell Carey](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please don't let PGE clear cut in Forest Park!  
**Date:** Sunday, December 1, 2024 9:35:37 PM

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Hello,

Please deny the permit for PGE to clear cut trees in Forest Park for the Harborton powerline expansion.

My wife and I often hike in this area of Forest Park with our dog. In fact, Forest Park is one of the main things that drew us to Portland when we first moved here four years ago. It is extremely rare to have such a pristine wild environment right next to a major urban area. When we're hiking there, it's easy to forget that we're just outside the city.

The existing clear cuts for power lines are already bad enough. Additional clear cuts will threaten the huge diversity of flora and fauna that make their home there. It will also make the park less desirable for human visitors.

I really hope the city doesn't allow itself to be bought off with PGE's empty promises. It's the city's duty to protect Forest Park for the use of all its residents and guests, not allow big industry to trample all over it for its own massive profits.

Thank you.

Max Carey  
Resident of North Portland (University Park neighborhood)

**From:** [Kristin Edmark](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Sunday, December 1, 2024 9:44:51 PM

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Dear Morgan Steele,

Please reject any plans by PGE to take out any trees in Forest Park. Please firmly uphold the priorities of the Forest Park Natural Resources Management Plan to preserve old growth within the forest. We must stand firm to protect Forest Park for all for the future. Forest Park is much used and appreciated. Any alterations to even a part of the park make a huge impact on the entire ecosystem and the experience of those who enjoy the park.

PGE has alternative locations outside Forest Park to locate the project.

Please reject PGE's proposal.

Sincerely, Kristin Edmark

**From:** [Erin M](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please keep Forest Park intact  
**Date:** Sunday, December 1, 2024 10:06:51 PM

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Dear Ms. Steele,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Erin Moore

**From:** [Daniel Rushton](#)  
**To:** [Caruso, Christine](#)  
**Cc:** [Steele, Morgan](#)  
**Subject:** Public Comment  
**Date:** Monday, December 2, 2024 5:17:48 AM

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Good Morning,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Daniel Rushton



**From:** [Maggie Mae](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public Comment  
**Date:** Monday, December 2, 2024 7:34:33 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled No

**From:** [Barbara KAdriance](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please don't approve Harborton Reliability Project land use permit  
**Date:** Monday, December 2, 2024 8:46:43 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

I am a Portland resident in part because Forest Park exists. Not only does it provide a singularly beautiful place to walk, but it is also a rare urban habitat that shelters a diverse community of plants, insects, birds, including the imperiled Northern Red Legged Frog.

Removing five acres or more of forest land along the powerline corridor to temporarily satiate tech companies' growing electricity needs is a terrible idea. It will diminish habitat for this precious ecosystem and thereby diminish the quality of human lives. The negative impacts of this proposal are also directly in conflict with the Forest Park Natural Resource Management Plan.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents and because it fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit. Thank you for your consideration.

Barbara Kohnen Adriance, Sellwood resident

**From:** [Dawn Knopf](#)  
**To:** [Steele, Morgan](#); [Hearings Office Clerks](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Monday, December 2, 2024 9:17:19 AM

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Hello, Morgan Steele:

I am writing today to ask you to reject PGE's proposal for phase three of its Harborton Reliability Project in Forest Park.

It's impossible to overstate the importance of Forest Park, specifically the North Unit, to my family and me. The forest there has helped raise my kids, and it's taught me important, obvious things just by existing with all its instructive metaphors—mother trees, reciprocal mycelial networks, and over-summering and resilient mosses and tardigrades. It has given my family and I respite and healing in ways I cannot explain in words. Most importantly, this section of Forest Park has taught my children and me that a forest is not just for our enjoyment or resources. It provides so much for us, but it's not only here to care for us. We must also care for the forest. I hope the city can be an example to its citizens about reciprocity and living in community with other species by rejecting PGE's proposal.

The city's land management plan for Forest Park, designating it as land that must grow to become an ancient forest, guarantees this. PGE's proposal contradicts the city's land management designation. The project destroys 170-500-year-old white oak trees and the stream-bed corridor that harbors the protected red-legged tree frog, many species of owls, elk, and so many more. Bird Alliance and Forest Park Conservancy ecologists have pointed out that proposed mitigation efforts will not replace this habitat and will cause permanent damage. As we manage one of the largest urban forests in the country, we must remain trailblazers in urban carbon sequestration, protection, and reciprocity for species with which we share the land while we also provide equitable access to nature.

This phase of the project appears to be a small amount of land to be deforested. However, the clearing of 4.7 acres sets lines in place and locks the utility into a series of much more destructive phases, estimated at 15 acres, or more. If this project is approved, the city creates a dangerous precedent for development of this forest designated for old-growth.

The public has recently uncovered that PGE learned of alternative options that do not involve Forest Park removal in a report produced by Toth and Associates; PGE potentially ignored those options, and/or hid them from public disclosure. At the time of this letter, we also have not heard why existing BPA lines cannot be used to supplement. PGE has acted irresponsibly and lacked transparency during public stakeholder meetings. Their deliberate lack of transparency through this process is unacceptable for a city utility, especially one that operates within a publicly-held forest. The permit must be rejected on these grounds alone, where other alternatives were not presented and clearing some of Forest Park was presented as the only viable option.

I urge you, as a representative for the citizens and land of this city, to reject PGE's phase three of the Harborton Reliability Project proposal as submitted.

Thank you for your consideration.

Kind regards,

Dawn Knopf  
Portland, OR

**From:** [Brandon Chadney](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Revised Land Use in Forest Park Comment  
**Date:** Monday, December 2, 2024 9:45:29 AM

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Dear Morgan and Christine

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.  
Brandon Chadney

**From:** [Sonrisa Alter](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition to Harborton Project  
**Date:** Monday, December 2, 2024 9:47:45 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Mallory Wall](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** I oppose clear cutting in forest park  
**Date:** Monday, December 2, 2024 10:15:32 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Mallory Wall-Tweten

**From:** [Ben Platt](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project comment  
**Date:** Monday, December 2, 2024 10:31:15 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Benjamin Platt  
97202



**From:** [Fox Convey](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment by fox convey  
**Date:** Monday, December 2, 2024 10:32:18 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is

clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Warmly,  
Fox Convey of Portland Oregon

**From:** [Evan Hansen](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Monday, December 2, 2024 11:06:10 AM

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Dear Morgan Steele:

As a native Portland who recently moved home (to a house with access to many Forest Park trails), I love living in a major city while easily being able to connect with the natural beauty of the Pacific Northwest. Forest Park is an incredibly special place to me and my family, supporting wildlife AND people—as its trees clean our air, filter our water, and cool our city. My kids have grown as naturalists and stewards of the planet through our access to the park. Having a place like Forest Park so close to home is a rare privilege, and we need to recognize how valuable of a resource it is—ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that—more cut trees, stream degradation, and habitat loss.

We can't let this happen. Forest Park is a precious resource, and we need to treat it as such.

PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,

Evan Hansen

3435 NW Thurman St.

Portland, OR 97210

**From:** [Tabitha Gentry DeLorio](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** deny PGE's land use permit in Forest Park  
**Date:** Monday, December 2, 2024 11:11:09 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Tabitha DeLorio

**From:** [Bobby Fellows](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment on PGE Proposal to Clear Cut Forest Park  
**Date:** Monday, December 2, 2024 11:25:38 AM

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Good Morning,

My name is Bobby Fellows and I am a high school teacher in Beaverton. I am also the sponsor of my school's Hiking Club which utilizes Forest Park as a natural gathering place for students regularly.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration.

Sincerely,

Concerned Resident

**From:** [Lilliann Palmeter](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Clearcutting in Forest Park  
**Date:** Monday, December 2, 2024 11:36:55 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Lilly Palmeter

**From:** [Kayla Harris](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment - Defending Forest Park  
**Date:** Monday, December 2, 2024 11:49:14 AM

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Hello,

My name is Kayla Harris, I am a Portland Resident, outdoor enthusiast, concerned citizen and I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. It then paves the way for PGE to continue clear cutting an additional 15 acres on top of that, further destroying vital habitats: for example future phases of the project could disrupt salmon habitat in the Miller Creek watershed and exacerbating growth and spread of invasive species.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. Why destroy a beautiful piece of Portland for the benefit of tech companies not even in our city? Certainly there are other regions that can be developed that do NOT require the destruction of natural forest and vital habitats for various species.

As a frequent visitor to Forest Park I care deeply about preserving the region and all the flora and fauna that call it home. Forest Park is the perfect escape from the city that doesn’t require long travel, costly permits, or concerns for safety. It’s the perfect blend of peaceful and convenient fun. It is my escape from the city, from stress at work and connection to the natural world. The numerous routes and paths that are available make it never boring to visit and the accessibility make it so me and any of my friends can join for a hike, run or bike ride. The diversity of Forest Park matches the diversity of those that visit and embrace it.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Kayla Harris  
Portland Resident

**From:** [Rebecca Steffoff](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Monday, December 2, 2024 11:58:02 AM

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Dear Morgan Steele,

As a 30-year resident of Portland, I moved here for the city's proximity to forested mountains and to the coast. However, I've come to deeply cherish our natural wonders right here in town. The greatest of these is Forest Park, which has become a key part of my outdoor life. Although I live on the other side of town, near the airport, I regularly hike in Forest Park, birdwatch there, and take out-of-town visitors there to show off this remarkable urban gem. Whether I head to Forest Park for a vigorous hiking workout or a leisurely "forest bathing" stroll, the park never fails to boost both physical and mental well-being. I've grown especially fond of its northern reaches and have spent many rewarding hours exploring them.

I'm writing to you to oppose PGE's proposed plan to expand its operations in Forest Park by cutting nearly 5 acres of forest near its Harborton power station, including some old and rare white oaks. This plan directly contradicts the Forest Park Natural Resources Management Plan.

The plan's primary purpose is to support Forest Park in becoming an old-growth forest. Cutting of acres of mature trees would do exactly the opposite. It would also reduce habitat for wildlife as well as diminish the park's ability to perform valuable ecosystem services, such as maintaining air, water, and soil health.

Of course we all need and want a safe and robust power grid. But PGE's own proposal acknowledges that other sites outside the park could be used to update its grid. The proposal also alludes to additional "phases" that could follow this one, which means that granting PGE permission to cut this 4.7-acre tract of forest will inevitably be seen as a prelude to further depredations of Forest Park. Our mission should be to protect and enhance this forested glory of a park as much as we can, not to chip away at it in the name of convenience for a utility company that has other options.

Please reject PGE's short-sighted proposal. The life of a forest is long . . . if we allow it to be.

Sincerely,

Rebecca Steffoff

--

Rebecca Steffoff  
[rebecca@steffoff.com](mailto:rebecca@steffoff.com)  
[steffoff1@gmail.com](mailto:steffoff1@gmail.com)



**From:** [Jonathan Haley](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU24-041109CUENGW  
**Date:** Monday, December 2, 2024 12:02:14 PM

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Dear Morgan Steele,

When I first moved to Portland, what stood out most to me was the seamless connection between the city and nature. One moment, I could be in the heart of downtown, surrounded by skyscrapers, and just a five-minute drive later, I'd find myself immersed in an old-growth forest. Forest Park is truly a special place. It offers sanctuary to wildlife, purifies our air, filters our water, and provides cooling to our city.

Over the past eight years of my recovery journey, Forest Park has been a refuge for me. When I was newly sober and rediscovering myself, I often found solace on its trails. Having a place like Forest Park so close to the city is an extraordinary privilege, and we must recognize its immense ecological and spiritual value. Forest Park's proximity to Portland is a rarity in the United States.

This is why PGE's proposal to develop inside Forest Park is deeply concerning. It contradicts the Forest Park Natural Resources Management Plan on multiple fronts:

- **Contradicting Old-Growth Goals:** The plan's top priority is to support Forest Park's evolution into an old-growth forest. PGE's proposal, which involves cutting down mature trees and replacing them with saplings, directly undermines this goal.
- **Ignoring Alternative Locations:** PGE's own analysis confirms that there are alternative locations for the project outside Forest Park. This means the power grid can be updated without compromising the integrity of Forest Park.
- **Setting a Dangerous Precedent:** Approving this proposal could open the door to further development in Forest Park, violating the management plan. PGE has already indicated this is part of a multi-phase project. If this phase proceeds, it could lead to more tree removal, stream degradation, and habitat destruction in future expansions.

Forest Park is an invaluable resource that we must protect, both for its ecological significance and its cultural importance. PGE's proposal not only conflicts with the management plan but also risks significant losses to our environment, wildlife, and community.

For the sake of the trees, the wildlife, the people, our city, and future generations, I urge you to reject PGE's proposal. Forest Park deserves our protection, now and always.

Thank you for your time and consideration,  
Jonathan Haley

**From:** [Azure Billinger](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Monday, December 2, 2024 12:09:51 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Azure Billinger

**From:** [Kami Sahalie](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project Public Comment  
**Date:** Monday, December 2, 2024 12:12:28 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

--

Kami Gould (she/her)

**From:** [Scott Carpenter](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU24-041109CUENGW  
**Date:** Monday, December 2, 2024 12:17:21 PM

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Dear Morgan Steele,

I first set foot in Forest Park in May 2002. At the time, my wife and I lived in Chicago with our two young sons. We were visiting Portland for a month to determine if we wanted to move here. I took my two young sons on a hike in Forest Park during that visit, and we almost immediately found a Dark-eyed Junco nest. I knew then we would end up in Portland, as having access to such a large, healthy forest just minutes from downtown was something not available in other cities we were considering.

We moved to Portland in July 2004. Since then, I estimate I have spent well over 5,000 hours in Forest Park, while my wife and two sons each have likely spent 1,000+ hours in Forest Park. Our sons are now adults, living outside of Oregon, and when they visit, one of the first things they want to do is hike in Forest Park, regardless of the weather. That is the pull of Forest Park to our family – it is an essential part of our existence, and our time there improves our mental and physical health. All of us always leave Forest Park feeling lifted, happier, and more relaxed than when we entered.

In addition to our general family visits, I also spend countless hours every year in Forest Park photographing the many species of owls that reside in the park, plus all the other birds in the park, from woodpeckers to songbirds to raptors. Sometimes I sit in one spot for eight hours, taking it all in: the heavenly symphony of bird song at dawn in the spring and summer; the gorgeous, dapple light filtering through the bigleaf maples; the intense predator-prey action; the tussles between territorial birds of the same species; and all sorts of other things I watched on PBS televised nature shows as a child. The fact that I can experience all of this, just 20 minutes from my home, is what makes Portland so special to me. But please don't just take my word for it -- you can see some of the photos I have taken over the years in Forest Park at <https://www.scottcarpenterphotography.com/> -- the vast majority of my photos of Northern Pygmy-Owls, many of my Barred Owl and Pacific Wren photos, and many of my Northern Saw-whet Owl photos were taken in Forest Park. The value of Forest Park to me as a bird photographer cannot be overstated.

I have explored Oregon and Washington extensively, and can attest that Forest Park is one of the best places I know of to find Northern Pygmy-Owls in such high concentration – there are likely 10-15 pairs nesting in Forest Park every year. This happens only because Forest Park is a sufficiently large and complex forest to attract the woodpeckers that create the cavities in which Northern Pygmy-Owls nest, while the forest also provides an ample prey base for the owls. All of this with some of the cleanest water within an urban boundary anywhere in the country. The value of this is immense for those of us who enjoy spending time in nature. The fact that this is accessible just minutes from downtown is really unique, and should be protected.

PGE's proposal to clearcut 4.7 acres, removing 376 living and 21 dead trees is anathema to the purpose of Forest Park. We should be working to ensure Forest Park becomes old growth, a top priority of the Forest Park Natural Resources Management Plan. PGE's proposal to remove 150+ year old Douglas firs and bigleaf maples, as well as 5 white oak trees estimated

to be 170-500 years old, is in direct contrast to the city's own stated goals for Forest Park. It is also short-sighted with respect to mitigating the impacts of climate change. We will need all the old growth possible in order to mitigate the effects of climate change, not just for all flora and fauna, but also for how the forest benefits people. In addition, oaks, which support the threatened Slender-billed White-breasted Nuthatch, are few and far between in Forest Park (and are a remnant of what they once were in the broader region) – we should be working to keep all existing oaks in place, not cutting them down.

PGE's own analysis indicates they have alternatives that don't require destroying any part of Forest Park. We should tell PGE to proceed with one of their alternatives. If we don't stop PGE from clearcutting now, they will most likely be back again and again to destroy more of this treasured forest. Now is the time to send a clear message to PGE that our public forest will be protected.

I encourage you to stand with all of us Portlanders that love Forest Park and reject PGE's proposal. In addition, I encourage you to act now to further codify protections for Forest Park, re-affirming the city's desire for it to become old growth. I would love to see the city consider the possibility of designating Forest Park as an Urban Biodiversity Reserve, making it crystal clear to everyone just how important Forest Park is.

Thank you for your time and consideration.

Sincerely,

Scott Carpenter  
Portland, Oregon

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Scott Carpenter  
Portland, Oregon  
Pronouns: he/him

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<http://www.scottcarpenterphotography.com/>

**From:** [Rob Neyer](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Monday, December 2, 2024 12:42:00 PM

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Dear Morgan Steele,

When I first moved to Portland in 2002, I lived just a short walk away from both Johnson Creek and Oaks Bottom, both of which wonderfully exemplified our city's commitment to natural areas and habitat restoration. Ten years later my family relocated to St. Johns, just across the Willamette from Forest Park. I have since spent hundreds of hours hiking and birdwatching in Forest Park, which (again) exemplifies one of the qualities that makes Portland such a special place. And just last month, I finally did something I'd thought about for years: hiking the entire Wildwood Trail. Now I want to do it again, but in the other direction!

PGE's proposal to develop INSIDE FOREST PARK is not just concerning; for many reasons, it's downright disturbing.

1. The proposal DIRECTLY contradicts the #1 priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
2. PGE's own analysis considered - and did not rule out - alternative sites for the project.
3. PGE has explicitly stated this would be the first phase in a multiphase project, and opening this door would likely encourage further development within Forest Park. That door should be closed now, and remain closed so alternatives will be considered and, if necessary, implemented.

Forest Park is a precious resource. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss.

I am asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Thank you for reading.

Best regards,  
Rob Neyer  
St. Johns, Portland

**From:** [Gabriella Weaver](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park Land Use Input  
**Date:** Monday, December 2, 2024 12:47:43 PM

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Hello,

My name is Gabriella Weaver. I'm a Multnomah County resident, small business owner, and frequent visitor to Forest Park.

I am writing to strongly urge Portland Permitting and Development to **DENY** the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harm bird and other wildlife populations, and impact recreational areas popular to many Portland residents, including myself.

I am aware that this project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. **These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.**

Beyond causing harm to the habitat, I don't believe that PGE’s power line expansion would benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. **I understand this can stimulate economic growth, but I don't believe it is worth the cost of Forest Park land, and I am concerned with the precedent that would set moving forward--signaling that our precious forests are disposable to corporate interests. PORTLANDERS DON'T WANT THAT.**

I am strongly opposed to this project due to its ecological, symbolic, emotional, and material impacts on myself, other Portland residents, and **the land**. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. ***Please refuse PGE’s land use permit.***

Thank you for your consideration, and I would love to be kept updated on how you proceed.

With care,  
Gabriella

G. Weaver  
pronouns: she/her

Certified Digital Wellness Educator + Creative Coach  
[ajnagabriella@gmail.com](mailto:ajnagabriella@gmail.com)

*may this communication aid in bringing to life our most integral dreams*



**From:** [Kosmo Barnes](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Comment for Forest Park  
**Date:** Monday, December 2, 2024 1:02:40 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Jules Mapilisan](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Monday, December 2, 2024 1:03:44 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Jules Mapilisan

**From:** [Olivia Breting](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE project  
**Date:** Monday, December 2, 2024 1:17:45 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Olivia Breting

**From:** [Madeleine Carde](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please deny clear cutting of Forest Park  
**Date:** Monday, December 2, 2024 11:48:28 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you,

Maddie Bowman, LEED AP

**From:** [Denise Mix](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Monday, December 2, 2024 1:36:42 PM

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Dear Morgan Steele,

When I first moved to the area, the first thing that struck me was how intertwined the city and nature are. I could be downtown, surrounded by skyscrapers, and then drive 5 minutes and be in old-growth forest. Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,  
Denise Mix

530.412.0200

**From:** [Jeremy Grondin](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment - Harborton Reliability Project  
**Date:** Monday, December 2, 2024 1:49:30 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

--  
Jeremy



**From:** [Andrea Raddliff](#)  
**To:** [Caruso, Christine](#)  
**Date:** Monday, November 25, 2024 10:28:20 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Jess Jurries](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Refuse PGE's land use permit in forest park  
**Date:** Monday, November 25, 2024 5:10:30 PM

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"To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please REFUSE PGE's land use permit. Thank you for your consideration."

**From:** [milo ochs](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Saving Forest Park  
**Date:** Monday, November 25, 2024 6:34:04 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Best Fishes (& Frogs),

Milo Ochs

**From:** [Sarah Ennes](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Stop the clear cut at Forest Park  
**Date:** Tuesday, November 26, 2024 12:31:23 AM

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Clear cuts damage ecosystems. It harms animals. Please stop the clear cutting of Forest Park. Please help take care of our Earth.

Sarah Ennes

Sent from my iPhone

**From:** [John Barnaby](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest park  
**Date:** Tuesday, November 26, 2024 10:49:09 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Love, peace & chicken grease  
~ John barnaby

**From:** [Phil Leander](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest park  
**Date:** Tuesday, November 26, 2024 10:50:14 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Love, peace & chicken grease  
~ John barnaby

**From:** [Susan Tonkin Riegel](#)  
**To:** [Caruso, Christine](#)  
**Subject:** P G & E PLEASE DONT DO THIS!!!  
**Date:** Tuesday, November 26, 2024 4:51:26 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Susan Tonkin Riegel

**From:** [Sherowski](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** We dont want a clear cut in Forest Park  
**Date:** Wednesday, November 27, 2024 12:20:31 PM

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**To whom it may concern,**

**I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.**

**The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.**



**Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.**

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.**

Jennifer

**From:** [Lucia Mendoza Cruz](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Public comment  
**Date:** Wednesday, November 27, 2024 1:38:35 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Shauna](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Priorities  
**Date:** Friday, November 29, 2024 4:34:16 PM

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Hi Christine!

Just saw an article that PGE wants to cut some acreage in Forest Park. I'm actually a resident in Hillsboro and have worked at Intel (through a contractor) for over 12 years. Please find another way. Forest Park is one of the signature beauties of Portland...a place where residents restore their mental health. I find peace just driving through it and, like so many other people, go on strolls and socialize with others in its priceless environment. I think disturbing that just for the intention of big corp profits would negatively effect many thousands of residents.

Please help protect the natural medicine of nature to preserve our mental health.

With respect and sincerity,

Shauna Fox

**From:** [Gregg Russell](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Monday, December 2, 2024 11:33:18 AM

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Forest Park is what Portland is well known for. It is a part of the city and well recognized by tourists visiting Portland. Once any portion of this great park is disturbed there is no turning back.

This is a battle between right and wrong, conservation versus economy, politics versus nature.

I and many other Portland area residents urge you to reconsider any change to Forest Park as this will surely have a negative affect throughout,

Gregg Russell

**From:** [Luci Moody](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Portland Permitting & Development Public Comment  
**Date:** Monday, December 2, 2024 2:19:40 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

I'm concerned this power line expansion may be used to support the Intel expansion project in Hillsboro. While these tech facilities provide important economic benefits to Oregon, I do not believe these benefits outweigh the costs of removing 5+ acres of native species in Forest Park. I am a resident of Hillsboro myself, and undoubtedly value the ecological benefits of Forest Park more than our growing tech industry. I am asking the city of Portland and PGE to find other property to develop.

I am strongly opposed to this project due to its ecological impacts on myself and other residents of the Portland metro area.

Please refuse PGE’s land use permit. Thank you for your consideration.

Luci Moody

**From:** [Maya Hurst-Mayr](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public comment on PGE proposal  
**Date:** Monday, December 2, 2024 2:39:25 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. I am a frequent user of Forest Park as a runner and it would be very sad to see some of the park clear cut. As an environmentalist, it would also be sad to have a smaller park and lost valuable habitat for plants and animals. We should keep the park for generations to come to enjoy.

Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Maya Hurst-Mayr  
Portland Resident and Runner in Forest Park

**From:** [Emily Harris](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Don't cut Forest Park  
**Date:** Monday, December 2, 2024 3:51:23 PM

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Dear Christine,

Please do not grant PGE the permit it seeks to cut trees in Forest Park. I've lived in many places all over the world and bragged about Forest Park everywhere. It's one of the best things about Portland, hands down. I've run every trail and firelane. Everytime I see the green hills as I'm crossing a bridge, I am grateful it's not a hillside full of houses. Forest Park connects people who live in totally distant parts of this city. It is our park. It is a respite and a source of beauty, to say nothing of it being home to beloved plants and animals. No part of it should not be up for bidding by any business or agency. It belongs to all of us, as it is. Especially in this era of rising temperatures and dwindling trees, no compensation would ever bring cleared acres back. The PGE request is not community minded and is not necessary for Portland to thrive. The park is.

Please DENY the permit request; and make it publicly clear this that keeping Forest Park intact is of high importance and value to you and other city managers who have this kind of responsibility.

Sincerely,

Emily Harris

**From:** [Max DeCorso](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Monday, December 2, 2024 4:29:44 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Maximum DeCorso



**From:** [Ellen Mendoza](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE's Request Under ITs Harborton Reliability Project.  
**Date:** Monday, December 2, 2024 4:39:13 PM

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To Morgan Steele:

Forest Park is a treasure for all the individuals who live in and around Portland, It is a haven from city development; industrial, commercial and residential. We use it to get away from concrete and metal by retreating into this hillside that has been left in a somewhat natural state. The park is used by hundreds of people every day for recreation, meditation, and solace. Tearing up nearly five acres, destroying sensitive frog habitat, just because PGE wants to, is not enough of a reason to permit this project.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Ellen Mendoza  
2866 SE Harrison St.  
Portland, OR 97214

**From:** [Trish Claffey](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE Plan for Forest Park  
**Date:** Monday, December 2, 2024 4:46:35 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Trish Claffey

Sent from [Outlook](#)

**From:** [Bobby A.](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Keep PGE out of Forest park and Reject the land use permit!  
**Date:** Monday, December 2, 2024 5:23:01 PM

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Dear Christine,

As a Portland resident and homeowner with roots in North Carolina I urge you to put a stop to PGE's desperate grab for land in Forest Park.

If the complete wipe out of my friends and family's community in Western NC isn't a warning call, maybe the double bomb cyclone which just ran through Washington and California will remind you that now more than ever we need to protect our forests and wetlands! We know that forests help reduce CO2 (and smog) and wetlands help protect from floods. Removing either from public lands is irresponsible and criminal.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. ***Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan.***

**Please refuse PGE's land use permit!**

Thank you for reading this plea, and thank you for your time and your consideration.

Best,

—Bobby A. Purks.  
Portland, OR

**From:** [Susie Anglada Bartley](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Do Not Cut One Tree  
**Date:** Monday, December 2, 2024 5:24:48 PM

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I am writing to state my opposition to cutting down even one tree in Forest Park for the purpose of expanding technology and corporate contracts. It is not in the best interest of the plants, animals, mushrooms, fungi, nor human beings to disturb or delete our most precious resource as a city and as a planet—forests. It is also not the choice of the people of this city to harm Forest Park.

I stand with those who stand against harming the forest.

Susan Anglada Bartley, M.Ed  
Author, Educator, Resister  
Pronouns: She/Her

**From:** [Emerson Salmon St. Pierre](#)  
**To:** [Steele, Morgan](#)  
**Subject:** forest park public comment  
**Date:** Monday, December 2, 2024 6:11:12 PM

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Howdy,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you for your time,  
Emerson Salmon St. Pierre  
Portland Resident

**From:** [seabass](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Concerns For Loss of Environment  
**Date:** Monday, December 2, 2024 6:14:00 PM

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You might have received a lot of emails in this format, but please do not mistake it for a lack of care and passion. Watching your world get torn down around you is painful. Having to beg the few people who have a political sway to intervene is demeaning.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Libby Fessenden](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Monday, December 2, 2024 6:15:28 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Libby Fessenden

**From:** [S Chokshi](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Forest Park Public Comment  
**Date:** Monday, December 2, 2024 6:41:24 PM

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Good evening,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sonali Chokshi (she/her/hers)  
Portland resident,



**From:** [Heather K](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Urge to deny land use permit to PGE  
**Date:** Monday, December 2, 2024 6:36:35 PM

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Dear Portland Permitting and Development staff and leadership,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

I am a Portland resident in part because Forest Park exists. Not only does it provide a singularly beautiful place to walk, hike, appreciate nature and just breathe, but it is also a rare urban habitat that shelters a diverse community of plants, insects, birds, including the imperiled Northern Red Legged Frog. It is high in ecosystem value, including value to humans. I personally have found health and healing in these woods, in being in nature and being active outdoors.

Removing five acres or more of forest land along the powerline corridor to temporarily satiate tech companies' growing electricity needs is both shortsighted and misguided. It is not the only solution and definitely not the best solution. The ecosystem cannot speak in its defense, so I and others speak to remind decision makers of the impacts to this special and valuable system. It will diminish habitat for this precious ecosystem and thereby diminish the quality of human lives. The negative impacts of this proposal are also directly in conflict with the Forest Park Natural Resource Management Plan.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents and because it fails to comply with the Forest Park Natural Resources Management Plan. We have poured so much as taxpayers and voters into investing in our parks, so why now would be diminish their value to the ecosystem and the people who live and visit?

Please refuse PGE’s land use permit. It is simply not in line with existing plans and with the values of our city. I know the pressure is great from those private companies whose success fuels our tax base, and I appreciate what they do, but their needs cannot and should not take priority over our valuable and treasured natural systems. When these companies change, evolve and possibly move, we won't get these sections of Forest Park resource back.

Thank you for your consideration.

Sincerely,

Heather Koch, MCP & MLA  
Resident of Sellwood-Moreland in SE Portland

**From:** [Johanna Kennelly Ullman](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE  
**Date:** Monday, December 2, 2024 6:56:27 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Katrina Alfano](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park Project  
**Date:** Monday, December 2, 2024 7:10:20 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Katrina Alfano  
Portland Resident

**From:** [Alexis Jagers](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public Comment: Forest Park PGE land use permit  
**Date:** Monday, December 2, 2024 7:19:40 PM

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Dear Christine and Morgan,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I also rely on access to Forest Park for my health and well-being and would be personally devastated by this destruction.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Alexis Jagers  
Portland, Oregon citizen and Forest Park user

**From:** [Torie Baldwin](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment on Harborton Reliability Project  
**Date:** Monday, December 2, 2024 7:21:25 PM

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I am writing to urge Portland Permitting and Development to **deny the land use permit** currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. I'm one of those residents -- Forest Park is one of my very favorite places in this city I grew up in.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Torie Baldwin  
Portland Resident

**From:** [Kyhetica Lattin](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Say no to PGE CUTTING DOWN TREES!  
**Date:** Monday, December 2, 2024 7:54:04 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Kyhetica Lattin

**From:** [Shelby Spade](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Please defend forest park from PGE  
**Date:** Monday, December 2, 2024 8:10:55 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird, and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Thank you,

--

**Shelby Spade, LPC**

She/Her

Licensed Professional Counselor

Mentor with 360 Transitions

Counselor at The Center at Heron Hill

[Shelby.spade@gmail.com](mailto:Shelby.spade@gmail.com)

P: 585-545-0708

W: 503-563-8606

**From:** [Alisa Folen](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment -- Deny PGE Land Use Permit  
**Date:** Monday, December 2, 2024 8:26:44 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would significantly impact Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming birds, frogs, and other wildlife populations, and impacting recreational areas popular with Portland residents.

Like many Portlanders, Forest Park is an important natural resource for me and my family. You have the power to preserve this natural resource and prioritize the well-being of our ecosystem. Even if this is a small concession, I worry it could lead to larger concessions of Forest Park land in the future.

Thank you,  
Alisa Folen



**From:** [Alexandra Moskow](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protect Forest Park!!!  
**Date:** Monday, December 2, 2024 8:47:53 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. I yearn to see Forest Park grow into ancient forest, with diverse flora & fauna populations.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. PLEASE refuse PGE’s land use permit. Thank you for your consideration.

Alexandra Moskow  
*Licensed Massage Therapist*  
*OR LMT #27480*



**From:** [Jasmyn Nekola](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest park  
**Date:** Monday, December 2, 2024 9:03:55 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [CJ Spaulding](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Save Forest Park  
**Date:** Monday, December 2, 2024 9:13:59 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

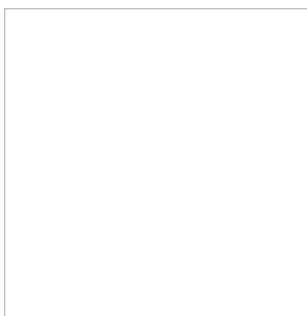
The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

With kindness,  
**CJ Spaulding, MSW, CSWA**  
associate clinician  
[sprouttherapypdx.com](http://sprouttherapypdx.com)  
she/they pronouns  
6011 NE Oregon St  
Portland, OR 97213  
**fax. 503.662.6221**

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Operating on the ancestral lands of Multnomah, Wasco, Cowlitz, Kathlamet, Clackamas, Chinook, Tualatin, Kalapuya, Molalla and many other First Nations.

**I use this font and size for accessibility.**

**From:** [Fran Browne](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE  
**Date:** Monday, December 2, 2024 9:23:37 PM

---

Hello!

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Fran Browne

**From:** [Katy Buchmueller](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park Logging  
**Date:** Monday, December 2, 2024 9:31:21 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thanks for your time,  
Katy  
Portland Area Resident

**From:** [Alyssa Cox](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Prevent PGE Powerline Expansion  
**Date:** Monday, December 2, 2024 9:42:57 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Alyssa Cox  
NE Portland Resident & Nature Lover



**From:** [Leslie Coleote](#)  
**To:** [Caruso, Christine](#)  
**Subject:** DENY PGEs land use permit  
**Date:** Monday, December 2, 2024 10:04:09 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration

Leslie Coleote  
Portland Resident

**From:** [lindsey.rae](#)  
**To:** [Caruso, Christine](#)  
**Date:** Monday, December 2, 2024 10:20:48 PM

---

hello, I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Lindsey Reissfelder

**From:** [Allison Martinez](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment - Stop Harborton Project  
**Date:** Monday, December 2, 2024 10:45:15 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,

Allison Martinez

**From:** [essau klopfenstein](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** End the PGE harborton reliability project, save nature"s biodiversity  
**Date:** Monday, December 2, 2024 11:23:19 PM

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Hello Steele and Caruso,

I was born in Portland, raised here my whole life. Forest Park is a unique treasure to our region, a vibrant forest area that feels magical as a child. as an adult the space is an accessible place to exercise and experience nature that you can find in the city or anywhere as close to the city as it is.

This being said I am asking for these things:

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely, Essau Klopfenstein

**From:** [Sophie Long](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Concern for Forest Park  
**Date:** Monday, December 2, 2024 11:40:21 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Concerned Citizen,  
Sophie Long

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**From:** M. Rohs <twocatsbotanicals@yahoo.com>  
**Sent:** Monday, December 2, 2024 3:52 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Regarding LU 24-041109 CU EN GW

Dear Morgan Steele,

I am writing to urge you to reject PGE's proposal to cut down and clear almost five acres of Forest Park.

Forest Park is a jewel in Portland's crown. I mean, honestly, even if I didn't use the park regularly, the fact that I can brag that it's the largest city park in the country is utterly fabulous when talking with my family members that think NYC is the center of the universe. ("Really? Bigger than Central Park??" Oh, heck, yes.) But beyond bragging rights, I cherish the park for every way in which it enriches my life. All I have to do to see a pileated woodpecker (or a downy woodpecker, or a hairy woodpecker, or...) is to drive across the river and walk a short ways from my car. I can enjoy trilliums in spring, thimbleberries and shaded pathways in the summer, minuscule mushrooms in autumn, dense evergreens in the winter, and a wide variety of cool, forested trails year-'round.

As an ethnobotany instructor (and field botanist and mycologist, less professionally), I treasure Forest Park's actual forest. Cutting down this vast swath would go against the park's Natural Resource Management Plan, as I'm sure you're hearing, and it will stymie the goal of achieving old-growth forest on that land. And it's not only in that 4.7 acres -- the surrounding forest will experience significant warming from the loss of canopy in the cut area. That's the last thing we need in an era of climate chaos, and it will hurt native species like Western red cedar and big leaf maple. There will be massive compaction of soil in the cut zone and surrounding areas, inviting weedy species to outcompete slow-growing natives. Speaking of weedy species, the cut (and the vehicles and boots that hit the ground to make it happen) will be a vector for exotic invasive plants, from Armenian blackberry to St. John's wort. All of this will create conditions that challenge the health of the surrounding forest, creating an impact far exceeding 4.7 acres of logging.

Please uphold the goals of the Natural Resource Management Plan: Support Forest Park's old-growth trajectory, and prioritize recreation and enjoyment of our beloved forested public land. Utilize the other options at hand that don't damage Forest Park. Don't let this set a precedent for the future of our public forest. This ecosystem, and our relationship to it, is too valuable.

Thank you.

Sincerely,  
Melissa Rohs  
SE Portland

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**From:** Lin DeMartini <rainbowabu@gmail.com>  
**Sent:** Monday, December 2, 2024 2:06 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Please do not allow ANY company/industry to destroy ANY part of Forest Park! Greed should not be allowed to destroy our environment for present and future generations.

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**From:** Lupin Cascadia DeMuth <doctordemuth@gmail.com>

**Sent:** Monday, December 2, 2024 6:49 PM

**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>

**Subject:** Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

When I first moved to Portland, the first thing that struck me was how intertwined the city and nature are. I could be downtown, surrounded by skyscrapers, and then drive 5 minutes and be in old-growth forest.

Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down



power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,

Lupin DeMuth

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**From:** Amie Wexler <amiewexler@yahoo.com>  
**Sent:** Monday, December 2, 2024 2:11 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Please accept these comments:

I am asking you to reject PGE's proposal, known as the Harborton Reliability Project, which would upgrade one existing power line, and build another through 4.7 acres of forest in the northernmost section of Forest Park. This secluded area of Forest Park includes two seasonal streams, 150+ year old trees, and a diverse native understory. It's also vital habitat for red-legged frogs, a sensitive species in Oregon.

The current proposal is phase 3 of a multiphase project, with at least 2 more phases already confirmed. PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. Removing 150 year old maturing trees, and replacing them with oak saplings does not come close to replacing the unique impacted habitat. PGE's Alternatives Analysis shows there are possible locations outside Forest Park, that should be further studied. Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park, further conflicting with the management plan. Again, please reject this proposal.

Thank you,  
Amie Wexler  
3533 NE 20th Ave.  
Portland, OR 97212

**AMIE WEXLER**  
**PHONE/TEXT** 503-473-4525  
**Pronouns:** she, her, hers

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**From:** Renee Intlekofer <rintelekofer@gmail.com>  
**Sent:** Monday, December 2, 2024 2:47 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

To Whom It May Concern,

The PGE proposal for the 5 acres of Forest Park is one that is only there to benefit one person, and that is PGE. Forest Park is an old growth forest, one of only 10% left in Oregon. If you remove even one old growth tree you destroy an entire habitat below it.

Habitat loss affects us all. It should be a no brainer in this day and age to protect what little we have left of these wonderful ecosystems that we Portlanders take pride in protecting for our future generations.

PGE is only looking out for itself and looking for the easiest option. They have not been transparent and held back information that there could be other possible options.

Please DO NOT approve this proposal, as our family loves Forest Park. Our 5 year old twin children love hiking the old growth, bird watching, looking for the biggest tree they can find. There are very few places left for the current and next generation to enjoy that provide so many beneficial things.

You may think 5 acres isn't much, but tell that to the 100s, and 1000s of species that have spent hundreds of years building their homes. Let's not tear down their homes for the sake of one corporation's need when they have the ability to do it elsewhere.

I hope you consider there is more to lose by passing this proposal than there is to gain.

All The Best,  
Renee Intlekofer

3640 SW Dosch Rd.  
Portland, OR 97239

310-721-2068

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**From:** Travis Smith <traviscameronsmith@gmail.com>  
**Sent:** Monday, December 2, 2024 2:59 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

I moved to Portland over fifteen years ago. Through all of the uncertainties of establishing myself in a new city, I was sure that I'd found my forever home. While there are plenty of great things about living in Portland, Forest Park was unlike anything I'd ever seen before. I had no idea that a city could coexist with nature so beautifully. No matter how hard things got, I could always take the bus and suddenly be surrounded by countless native trees in a beautiful forest with strong biodiversity. We talk so much about accessibility, but this was a clear example of accessibility in action. I was barely scraping by but I can't overstate how important Forest Park was for my mental and physical health. My life has changed so much since then, but I still go to Forest Park to clear my mind and feel connected to nature and the world around me. Places like Forest Park give people a connection to the places they live, and that's harder and harder to come by these days.

This is why I'm uncomfortable with PGE's proposal to develop inside Forest Park. It goes against what our beautiful city stands for and I've just learned that it doesn't meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan. How does cutting down mature trees and replacing them with saplings align with their goal of making Forest Park an old-growth forest? Plus PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

I'm worried that this project could set the precedent for future development in Forest Park that would slowly wear down what makes it so unique. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream

degradation, and habitat loss.

Some things can't be undone, and the potential ecological and cultural loss is just unacceptable. I'm asking that you reject PGE's proposal for everyone who has ever found peace and joy in Forest Park.

Sincerely,  
Travis Smith

**From:** Cristy Murray <doglady8@gmail.com>  
**Sent:** Monday, December 2, 2024 3:29 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

I am writing to express my opposition to PGE's proposal to expand their power grid infrastructure in Forest Park. My main reasons are as follows:

- PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. Removing 150 year old maturing trees, and replacing them with oak saplings does not come close to replacing the unique impacted habitat.
- PGE's Alternatives Analysis shows there are possible locations outside Forest Park that should be further studied.
- Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park, further conflicting with the management plan.

Sincerely,  
Cristy Murray  
Oregon City, OR

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**From:** Abby VanLeuven <avanleuven14@gmail.com>  
**Sent:** Monday, December 2, 2024 3:55 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Hello,

My name is Abby and I am concerned about the PGE proposal that would destroy a section of forest park to create a transmission line- one that could be located elsewhere given the other potential openings that have been sited. My main concerns are as follows:

- This plan directly goes against the Forest Park Natural Resources MGMT plan - a plan that was put into place in the 90's and was erected to protect, care for and ensure that forests right here in Portland would have the chance to grow into old growth forest- a habitat that is ESSENTIAL to many animals in the area.
- PGEs plan to plant a monoculture of Oak does not come close to replicating the habitat that would be lost if this plan is enacted. A habitat that includes 2 streams and permanently filling in a wetland- both of which support key wildlife- including the red legged frog.
- PGE has not been transparent about this project which makes me question if they are acting in good faith. Examples of this are: failing to release the Toth report which shows viable alternatives until October 2024 AND not being transparent about their plans for future phases and the impacts those would have.
- There are other options which PGE has kept quiet (Toth report). These options are completely viable and do not cut into unique and important habitat.
- Finally, approval of this project could set a precedent for future phases of PGE's project and other development in forest park. This is very alarming to me as someone whose love of nature started in forest park as a young child.



Part of the reason I am so proud to be a portlander is that as a city we have an incredible forest RIGHT in the city. This is so unique and offers a chance for wildlife to move and live freely in a city. This is also a touch point for so many people. A way for people to connect with the natural world, seek solace and a mental health break and in general take advantage of a natural area that most people in the US don't have. Its so important that we as a city stand up to companies trying to encroach on this amazing forest and resource that we have. I would be incredibly dismayed and upset if we let PGE build in forest park and set the precedent that development outweighed the positive impact that this forest has on so many people, animals and our ability to keep fighting climate change.

THanks,  
Abby Vanleuven

**From:** [Eric Miller](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Reject Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 6:55:47 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

Forest Park is one of Portland's great treasures. Even a mere 5 acres going to this project is an unconscionable infringement on the very values of Portland being a green city. Not only is Forest Park an incredible place to walk and hike, but it is also a rare urban habitat that shelters a diverse community of plants, insects, birds, including the imperiled Northern Red Legged Frog.

Removing five acres or more of forest land along the powerline corridor to temporarily satiate tech companies' growing electricity needs is a terrible idea. It will diminish habitat for this precious ecosystem and thereby diminish the quality of human lives. The negative impacts of this proposal are also directly in conflict with the Forest Park Natural Resource Management Plan.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents and because it fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit. Thank you for your consideration.

Eric Miller  
744 SE Malden St  
503-545-7312

**From:** [Jude Mesa](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE Forest Park  
**Date:** Tuesday, December 3, 2024 7:20:48 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration

-Jude Mesa

**From:** [Janet or Deane](#)  
**To:** [Caruso, Christine](#)  
**Subject:** please deny the land use permit request by PGE  
**Date:** Tuesday, December 3, 2024 7:39:32 AM

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Please deny the land use permit that Portland General Electric (PGE) is requesting for the "Harborton Reliability Project" powerline expansion.

Forest Park is a unique, valuable resource for both people and wildlife. It is a treasure that should be protected, not clear cut for power. And especially power for the technology companies in Hillsboro.

I have hiked many times in Forest Park. I have taken my grandkids there. I have noted the building sites that had not been built upon - and I have been grateful for the protection that prevented the forest from turning into a housing development.

Forest Park is needed as it is.

Please don't justify approving this because it is 'just 5 acres'. Starting with this would only make it easier to do it again. Please say NO.

Respectfully,

Janet Black  
13960 SW River Lane  
Tigard, OR 97224

**From:** [aro.fox33@gmail.com](mailto:aro.fox33@gmail.com)  
**To:** [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Tuesday, December 3, 2024 8:53:09 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

- Aro Fox

**From:** [Courtney Rhoden](#)  
**Subject:** Request to Deny PGE Land Use Permit  
**Date:** Tuesday, December 3, 2024 8:57:53 AM

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Dear Portland Permitting and Development,

I am writing to strongly urge you to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As previously noted by the City, this project would have significant negative impacts on Forest Park and the surrounding ecosystem, undermining the park's management goals, damaging wildlife populations, and affecting recreational areas that are cherished by Portland residents.

The project involves the clearcutting of at least five acres of forest along the powerline corridor, including habitat critical for the endangered Northern Red-Legged Frog. These destructive actions directly contradict the Forest Park Natural Resource Management Plan.

Furthermore, PGE's proposed powerline expansion will not benefit Portland residents. Instead, it primarily serves to support energy infrastructure for the rapidly growing technology sector in Hillsboro, including major developments like the Intel expansion project. While PGE claims the project is necessary to meet the increasing demand from climate-smart electrification, their own data shows that most of the demand is driven by these tech facilities, not residential needs.

Given the significant ecological and economic consequences for Portland and its residents, I strongly oppose this project. Moreover, PGE's proposal fails to comply with the Forest Park Natural Resource Management Plan. I respectfully ask that you deny PGE's land use permit for this project.

Thank you for your consideration.

Sincerely,  
Courtney Rhoden (Portland resident, Piedmont neighborhood)

**From:** [Emily Baker](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park Public Comment  
**Date:** Tuesday, December 3, 2024 9:28:31 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [alex](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Public Comment  
**Date:** Tuesday, December 3, 2024 10:26:13 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

alexandra



**From:** [Rachel Kabel](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 11:18:10 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Rachel Kabel

**From:** [Claire Carter](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Tuesday, December 3, 2024 11:20:59 AM

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Please deny PGE's land use permit to clear cut part of Forest Park! Thank you.

Sincerely,

Claire Carter

1005 SE Malden St.

Portland, OR 97202

Sent from my iPhone

**From:** [Desmond Aron](#)  
**Subject:** Deny PGE's "Harborton Reliability Project"  
**Date:** Tuesday, December 3, 2024 11:52:44 AM

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Hi there,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

I care desperately about the preservation of our local community's natural areas, especially forest park, a rare treasure in the downtown area. Our wildlife deserve somewhere safe to live as this project would disrupt the red-legged frogs and the salmon of the Miller Creek watershed as well. Please listen to your heart and stop this endless growth of cruel technology companies' wealth at the cost our beautiful planet.

Thank you for your consideration.

Sincerely,  
Desmond Aron

--

Desmond Aron

**From:** [Miles Cernauskas](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Tuesday, December 3, 2024 12:10:19 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Miles

**From:** [Aaron Jarrett](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forrest Park  
**Date:** Tuesday, December 3, 2024 12:25:36 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Jim Hardison](#)  
**To:** [Caruso, Christine](#)  
**Subject:** "No" on Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 12:56:43 PM

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Hello,

As a Portland resident, I believe that Portland Permitting and Development should deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

I am strongly opposed to this project due to its ecological and economic impacts and because it fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit.

Jim Hardison

**From:** [Sasha Wassermiller](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Defend forest park!  
**Date:** Tuesday, December 3, 2024 1:51:42 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sent from my iPhone

**From:** [S. Wolf](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Public Comments To defend Forest Park.  
**Date:** Tuesday, December 3, 2024 1:53:16 PM

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This is an awful idea and I don't support and I choose to defend a park I've loved for over 12 years.

Here are some points as to why it is a bad idea.

**If approved, this next phase of the project would clear-cut 5 acres of forest habitat** that is critical for red-legged frogs and other protected species, while paving the way for PGE to continue clear-cutting over [15 additional acres](#) in Forest Park.

This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands. The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern.

Future phases of the project could disrupt salmon habitat in the Miller Creek watershed

Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in the existing clearcuts, which poses a threat to the local ecology and increases wildfire risk.

**The project fails to comply with the Forest Park Natural Resources Management Plan (NRMP)**

The NRMP's main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE's project is not in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project *outside* of Forest Park.

**This project is *not* for supporting energy needs of local communities, as PGE claims, but for supporting large tech companies like Intel on residential ratepayers' dime.**

PGE is focused on expanding transmission and energy generation infrastructure to meet the demand of rapidly growing industrial facilities, such as Intel's new \$36 billion chip-making plant in Hillsboro, which would consume [roughly as much electricity as 50,000 homes](#).

[According to PGE's schedule for load growth change](#), residential demand is projected to increase by only 3.5% between 2016-2025. Heavy industrial demand, on the other hand, has a projected increase of almost 150%.

PGE has repeatedly raised energy costs for ratepayers [while subsidizing energy](#)



[costs for large tech industry facilities](#) in Washington County's Silicon Forest.

**If this project is primarily to support Intel's expansion, then it is fueling corporate expansion, colonial extraction, and genocide.**

In September 2024, the US paid Intel \$3 billion to produce microchips related to "national security" (microchips are used for various weapons systems and products of "war"). Intel's plans to build a new microchip plant in Hillsboro is part of this contract.

The US has been sending billions of dollars worth of military aid to Israel to carry out its genocide in Gaza, and Intel's plant would allow the US to send even more.

Intel is also one of Israel's largest tech employers, operating primary centers for manufacturing, research, and development there. Intel has made commitments to invest billions of dollars in Israeli companies over the next decade, and Israel awarded Intel a multi-billion dollar grant to build a microchip manufacturing plant there, similar to the one they plan to build in Hillsboro.

**PGE's project, in its ties to Intel's expansion, would negatively affect and displace farm owners and workers in the area.**

To prepare for the expansion of Intel and other high-tech companies in Washington County's Silicon Forest, the State of Oregon has changed land use laws to allow for corporate expansion into farmland outside Hillsboro, thus setting the stage for pushing out farmworkers in the region.

**PGE claims its work will not impact sensitive species, but this is a lie.** The route PGE plans to build the transmission line through is home to the red-legged frog — a federally recognized species of concern that is protected in Oregon — and some of the last remaining habitat for the red-legged frog in the region.

**PGE claims their restoration plans are adequate,** but the City of Portland stated in a letter that PGE's proposed restoration plan would actually take a minimum of 80 years to mature, would allow invasive species to flourish, and would fail to mitigate the long-term effects of clearing.

As a portland resident over more than a decade I'm against it.  
Samuel Walsh.

**From:** [Dennis Gould](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE - Forest Park  
**Date:** Tuesday, December 3, 2024 1:59:27 PM

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The plan from PGE to clear-cut 5 acres in Forest Park is regressive, a throwback to a time we should have passed. If the folks at PGE are not clever enough to find a way to deliver electricity that does not damage the environment then Portland needs to give the monopoly on delivering electricity to another company. Big assumption: that there are such companies out there operating in the present. Dennis Gould, 2057 SE 113th

**From:** [Caroline Adams](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Tuesday, December 3, 2024 2:05:49 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Maggie Musty](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Protect Forest Park - Deny PGE Land Use Permit  
**Date:** Tuesday, December 3, 2024 3:16:19 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular with Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

As a resident of Portland who frequently visits Forest Park, I am concerned about the lasting impact this project could have on our environment, wildlife, and the character of our city. Many Portlanders choose to live here due to the convenient access to nature, and Forest Park plays a crucial role in maintaining this aspect of our city's identity. I strongly encourage you to consider the wider consequences of approving this permit.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's use permit.

Thank you for your consideration.

Sincerely,

Maggie Musty

**From:** [Fiona Wesley](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Public Comment regarding PGE permit  
**Date:** Tuesday, December 3, 2024 4:07:45 PM

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Hello,

I am a resident of Multnomah County and work in behavioral health at The Recovery Gym, a project of the Alano Club.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**Fiona Hannan**

**From:** [Camille Pass](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Public Comment in Defense of Forest Park  
**Date:** Tuesday, December 3, 2024 4:52:39 PM

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Dear Morgan Steele,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. I have been a resident in Portland, Oregon for the past 6 years. Forest Park has made a significant impact on my life as it is one of the only true green spaces in this city. Permitting a company to clear cut a section of it is in direct opposition to the purpose of Forest Park and how much it means to our city. This space is sacred and meaningful to me but on a very micro level the species that inhabit this land.

Please refuse PGE’s land use permit. Thank you for your consideration. Please do the right thing for many generations to come!

Thank you,  
Camille Pass

**From:** [Carla McHattie](#)  
**To:** [Caruso, Christine](#)  
**Subject:** No to power through Forest Park!  
**Date:** Tuesday, December 3, 2024 5:15:41 PM

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I am so sad to learn of the plans to defile acres of our beloved green space Forest Park with power lines. This destruction is garbage. Go around. Is nothing sacred?

Carla McHattie  
21 SE 26th Ave  
23 year resident, and my husband was born in Portland and is of NW native decent. Currently looking at you poor public schools for our son and wondering why this is the project you throw money at.

Let it Snow,

-Carla

Carla McHattie

**From:** [Alex Love](#)  
**To:** [Caruso, Christine](#)  
**Subject:** DEFEND FOREST PARK  
**Date:** Tuesday, December 3, 2024 5:23:32 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sent from my iPhone



**From:** [Nancy Guidry](#)  
**To:** [Caruso, Christine](#)  
**Subject:** No clear cutting in Forest Park  
**Date:** Tuesday, December 3, 2024 5:34:01 PM

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Hello Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you from an avid forest park visitor,  
Nancy Guidry

**From:** [Byron Tatman](#)  
**Subject:** Protect Forest Park - Feedback from a concerned Portland voter  
**Date:** Tuesday, December 3, 2024 5:54:49 PM

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To whom it may concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**If approved, this next phase of the project would clear-cut 5 acres of forest habitat** that is critical for red-legged frogs and other protected species, while paving the way for PGE to continue clear-cutting over [15 additional acres](#) in Forest Park.

This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands. The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern.

Future phases of the project could disrupt salmon habitat in the Miller Creek watershed

Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in the existing clearcuts, which poses a threat to the local ecology and increases wildfire risk.

**The project fails to comply with the Forest Park Natural Resources Management Plan (NRMP)**

The NRMP's main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE's project is not in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project *outside* of Forest Park.

**This project is *not* for supporting energy needs of local communities, as PGE claims, but for supporting large tech companies like Intel on residential ratepayers' dime.**

PGE is focused on expanding transmission and energy generation infrastructure to meet the demand of rapidly growing industrial facilities, such as Intel's new \$36 billion chip-making plant in Hillsboro, which would consume [roughly as much electricity as 50,000 homes](#).

[According to PGE's schedule for load growth change](#), residential demand is projected to increase by only 3.5% between 2016-2025. Heavy industrial demand, on the other hand, has a projected increase of almost 150%.

PGE has repeatedly raised energy costs for ratepayers [while subsidizing energy costs for large tech industry facilities](#) in Washington County's Silicon Forest.

**If this project is primarily to support Intel's expansion, then it is fueling corporate expansion, colonial extraction, and genocide.**

In September 2024, the US paid Intel \$3 billion to produce microchips related to "national security" (microchips are used for various weapons systems and products of "war"). Intel's plans to build a new microchip plant in Hillsboro is part of this contract.

The US has been sending billions of dollars worth of military aid to Israel to carry out its genocide in Gaza, and Intel's plant would allow the US to send even more.

Intel is also one of Israel's largest tech employers, operating primary centers for manufacturing, research, and development there. Intel has made commitments to invest billions of dollars in Israeli companies over the next decade, and Israel awarded Intel a multi-billion dollar grant to build a microchip manufacturing plant there, similar to the one they plan to build in Hillsboro.

**PGE's project, in its ties to Intel's expansion, would negatively affect and displace farm owners and workers in the area.**

To prepare for the expansion of Intel and other high-tech companies in Washington County's Silicon Forest, the State of Oregon has changed land use laws to allow for corporate expansion into farmland outside Hillsboro, thus setting the stage for pushing out farmworkers in the region.

**PGE claims its work will not impact sensitive species, but this is a lie.** The route PGE plans to build the transmission line through is home to the red-legged frog — a federally recognized species of concern that is protected in Oregon — and some of the last remaining habitat for the red-legged frog in the region.

**PGE claims their restoration plans are adequate,** but the City of Portland stated in a letter that PGE's proposed restoration plan would actually take a minimum of 80 years to mature, would allow invasive species to flourish, and would fail to mitigate the long-term effects of clearing.

Kind Regards,  
Byron Tatman

**From:** [Claire J Prichard](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE Land Permit  
**Date:** Tuesday, December 3, 2024 7:01:31 PM

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Dear Christine Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you,  
Claire Prichard

\*\*I use voice to text as an accessibility feature. Let me know if something doesn’t make sense.

\*\*\*I often use support to read and reply to emails. Please be patient with my communication.

“Disability justice means we are not left behind; we are beloved, kindred, needed.”

-Leah Lakshmi Piepzna-Samarasinha, [Care Work: Dreaming Disability Justice](#)

**From:** [Sam Klickner](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** STOP PGE Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 12:06:01 AM

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Hi,

I am writing to you as a resident of Portland, Oregon. I advocate wholly for the conservation and preservation of what many (including myself) consider our region's most ecologically important and uniquely beautiful (Beauty, regardless of whatever adverse opinion you may hold, is of fundamental and objective importance to being alive) aspect: the dense and diverse, and (if we'll allow it) thriving habitat to countless lives, Forest Park.

I hereby submit this comment urging you to DENY PGE's Harborton Reliability Project which would, if passed, result in the clearcutting of nearly dozens of Forest Park's acreage. This proposal is an unacceptable gesture of concession to corporate interest, which has absolutely no fundamental relation to being alive. Consider this: policy should submit to life--- not the inverse.

Thank you,  
Sam Klickner

**From:** [Matt T.](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend forest park!  
**Date:** Tuesday, December 3, 2024 12:47:00 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Tereza T](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Do not cut trees in/adjacent to Forest Park  
**Date:** Tuesday, December 3, 2024 1:56:35 AM

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Hello,

I urge you to say no to the planned tree cutting in and adjacent to Forest Park. We are a city that prides itself on being green and eco-conscious. We need to live by our values. This growing city, our state with a worsening forest fire crisis each year, and our planet amidst a climate emergency need every single tree to sustain life. Do not cave to corporate pressure to develop land for the sake of profit-driven companies. Say no to cutting trees in and near Forest Park.

Thank you,

Tereza Bottman  
long-time Portland resident, parent, writer, and teacher



**From:** [Jacquelin Molina Guillen](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Date:** Tuesday, December 3, 2024 3:21:45 AM  
**Attachments:** [Screenshot 2024-12-03 at 6.20.39 PM.png](#)

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To whom it may concern~

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

P.S. please see the attached poem "Woods" I wrote, which was published in Bicoastal Review in 2023, about my admiration for Forest Park to know that I care deeply about these lands.

Lo mejor,  
Jacquelin

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*Jacquelin Molina Guillen*  
Email: [jacquelinemolina6@gmail.com](mailto:jacquelinemolina6@gmail.com)  
Pronouns: She/Ella

**From:** [Gypsy Prince](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public Comment - Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 3:36:24 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Gypsy Prince

**From:** [Amber](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Deny the Forest Park Clear Cuts by PGE  
**Date:** Tuesday, December 3, 2024 6:24:54 AM

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To whom it may concern,

My name is Amber and I am a deep deep lover and enjoyer of Forest Park. Forest Park was the first place that had me decide to move to Portland because of its wonderment of expansive trees and forest in a city.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration. It breaks my heart that this is even being considered.

A concerned PDX resident,  
Amber - NE Portland

**From:** [Justin Condon](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** Public Comment for PGE's Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 6:58:06 AM

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Hello,

I'm a Portland resident who chooses to bike as a commuter in this beautiful place as a way of reducing my environmental impact considering the dire environmental climate we currently live in. I would like to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

This project is ill sighted considering we live at a time when the natural lungs of this area (the forest canopy) are needed more than ever. As someone who breathes this air daily during my only means of transportation I am begging you to deny this request!

The Harborton Reliability Project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion.

Thank you for your time,  
Justin Condon

**From:** [Elvan Wilson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Tuesday, December 3, 2024 7:47:59 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [O.M.](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park is Sacred  
**Date:** Tuesday, December 3, 2024 7:51:36 AM

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Dear Both,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Many thanks,  
Omar Ordaz (a Portland “Native”)

**From:** [Jack Newquist](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 8:35:07 AM

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I am a Portland resident born and raised here and I have always loved forest park. To have easy access to such a large natural area so close to the city is no small feat, it's a valuable part of Portland and my life. I have done so much restoration work removing invasive species in the park and it's really special area. Allowing this plan to go through is the wrong decision, don't allow corporate greed to win-let us keep our park all of it! And with that intro I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration

Hope you actually read this, this shouldn't be allowed!

-regards

Jack Newquist

**From:** [madeleine bloch](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment PGE permitting DENY  
**Date:** Tuesday, December 3, 2024 8:52:00 AM

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To whom it may concern

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Madeleine Bloch  
Lifelong Portland resident and business owner



**From:** [Sydney Scarff](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Reject PGE clear cutting forest park  
**Date:** Tuesday, December 3, 2024 9:10:48 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,

**Sydney Scarff**  
3195303350  
[sydneyscarff@gmail.com](mailto:sydneyscarff@gmail.com)

**From:** [Windsor Meyer](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Don't let pge clearcut forest park!  
**Date:** Tuesday, December 3, 2024 9:18:55 AM

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Hello,

My name is Windsor Meyer and I am a Portland resident. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Windsor Meyer

**From:** [Nico Sweeney](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition to PGE Deforestation  
**Date:** Tuesday, December 3, 2024 9:22:51 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. I also believe that this project would be a step in the wrong direction in the fight against catastrophic climate disasters, which we see impacting much of the world today. We need to protect and preserve our natural environments as much as possible if we want to save our communities from climate emergencies. Please refuse PGE's land use permit. Thank you for your consideration.

Best,

- Nico Sweeney

**From:** [Daye Thomas](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment on Denying PGE's land use permit  
**Date:** Tuesday, December 3, 2024 9:29:51 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. I love Forest Park and part of the reason I stay in this city I love is the greenery around me that sets apart Portland from other areas. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Best,  
Daye Thomas  
Portland Resident for the last 8 years

**From:** [Jade](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** NO DESTRUCTION OF FOREST AND TREES AT FOREST PARK  
**Date:** Tuesday, December 3, 2024 10:02:22 AM

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**The repercussions for clear cutting forest land should be obvious by now! You two have power, use it for GOOD. May your conscience weigh heavily on you to make good decisions. May you learn deeply when you make harmful ones.**

**I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.**

**The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.**

**Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.**

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.**

**Sincerely  
Holland, resident of Multnomah County**

**From:** [Kaley Bales](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny PGE - Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 10:04:03 AM

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Hello,

My name is Kaley, a Portland OR resident and I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,

Kaley Bales

12-3-24

To Morgan Steele, Christine Caruso, and PGE,

Why are we doing this? For as much talk and effort that is put in to making Oregon and Portland a “Green City” this completely contradicts everything. Can we not leave any space untouched? Is there not another option to place this line? There are ample industrial and vacant lots available that surely could work around the city. If PGE is allowed 5 acres plus an additional 15 then other projects will want to come in from other companies and take some of Forest Park as well. PGE is already raising our rates and now they want our forests. I consider this totally shameful. When Forest Park was preserved and founded decades ago residents understood the importance of it and what it meant and if they had not it would have been developed. They were looking into the future and their foresight still exists. It seems we now have lost sight of that.

On the Forest Park website it lists all of the benefits of the park and what you can and cannot do. The website states, “Forest Park, at 5,200 acres, provides critical refuge for hundreds of native wildlife and plant species and acts as an important air and water filter. With more than 80 miles of trails, it also provides invaluable access to nature, exercise, and educational opportunities for the region.” By allowing clear cutting and destruction by a massive corporation this statement is completely undermined. If this permit is allowed, I hope the website will be updated to reflect this. PLEASE DENY THE PERMIT.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Andy Haugen  
Lifelong Oregonian and concerned citizen.  
23737 SW Scholls Ferry Rd Hillsboro, OR 97123

**From:** [Ardys Dunn](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Land Use permit to PGE in Forest Park  
**Date:** Tuesday, December 3, 2024 10:23:51 AM

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I am writing to ask the Portland Permitting and Development committee to deny the land use permit that Portland General Electric (PGE) is asking for the “Harborton Reliability Project” powerline expansion. I am strongly opposed to this project.

Forest Park is a special place for me. I have spent many hours running there, training for the Portland (and other) marathons, and think its unspoiled beauty is a treasure for all Portland residents. Also, it is a rare urban habitat that shelters a diversity of plants, insects, birds, and wildlife, including, as my neighbor tells me, the imperiled Northern Red Legged Frog.

Even though PGE is asking for "only" 5 acres, that amount of land will decimate the habitat for this ecosystem, and the project fails to comply with the Forest Park Natural Resource Management Plan.

Please refuse PGE’s land use permit. Thank you for your consideration.

Ardys McNaughton Dunn, Sellwood resident



**From:** [Chelsea Starsee Riley](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please defend Forest Park for our childrens' futures  
**Date:** Tuesday, December 3, 2024 10:30:14 AM

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Hello there and thank you for your time today.

My name is Chelsea, I am a current PSU student pursuing my Masters in Social work, aiming to work as a school social worker in k-12 settings. Hearing of the potential clearcutting of one of Portland's most beloved natural strongholds has me absolutely gutted. The idea that an immensely crucial natural area like this park could be turned into a destroyed environment for the sake of capitalist gain is horrendous and frankly extremely disappointing. As someone working directly with children, their futures are of utmost importance to myself and our community of educators and administrators.

Allowing our natural resources to be stripped away for technology gains is a dangerously slippery slope. What is one more forest cut down after the next? In these swiftly changing times of climate catastrophe, the future is contingent upon our protection and valuing of our ecosystems. Please stand with Portland and the future of our children and generations to come in defending Forest Park against this logging threat. Our planet is showing us regularly how little more damage it can take.

Warmly,  
Chelsea Riley  
MSW, Portland State University

**From:** [kellye@enersolinc.com](mailto:kellye@enersolinc.com)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park development by PGE  
**Date:** Tuesday, December 3, 2024 10:33:56 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Kellye Just

**From:** [Jordan Bates](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Request to deny PGE's land use permit  
**Date:** Tuesday, December 3, 2024 10:36:55 AM

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As a Portland resident and regular enjoyer of Forest park, I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration,  
Jordan Bates

**From:** [Maxx Katz](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Protect Forest Park please  
**Date:** Tuesday, December 3, 2024 10:40:51 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Maxx Katz

**From:** [Ky](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Tuesday, December 3, 2024 10:56:31 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration

Kyle Seward  
Portland resident

**From:** Carol Canning <canning.carol@gmail.com>  
**Sent:** Tuesday, December 3, 2024 10:24 AM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** LU 24-041109 CU EN GW

Comments pertaining to PGE's expansion permit to go through Forest Park .

The proposed expansion into Forest Park is reasonable.  
There are plans to mitigate disruption to the landscape and the intrusion is not extensive.  
Alternate plans are expensive and unwieldy.

Thank you,  
Carol Canning  
503-286-9534  
13838 NW Riverview Dr, Portland, OR 97231  
Portland, OR



**From:** [Justin Altemus](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE's proposal to clear-cut acres of Forest Park  
**Date:** Tuesday, December 3, 2024 11:11:34 AM

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To whom it may concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration.



**From:** [Maddy Gehr](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Save Forest Park!  
**Date:** Tuesday, December 3, 2024 11:13:43 AM

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Hello,

I am emailing as a resident of Northeast Portland to express opposition for the land permit PGE wants for the Harborton Reliability project powerline expansion! Not only would the destruction of Forest park mean critical animal habitats are destroyed, but the project doesn't even go to support Portland residents. It's just one more way for the city to support huge tech giants by funneling power to corps like Intel (who also happen to be helping fund the genocide in Gaza) and make it even less possible for working and middle class people to live here.

Residents of Portland love and enjoy Forest Park, and green spaces like it are what make this city so beautiful. By allowing it to be parcelled out and sold off to the highest bidder, the city is showing yet again that it doesn't actually care at all about the people who work and live here every day and who want to have access to nature. If you approve this permit you will be tarnishing your name as one of the people who helped destroy a beautiful part of what makes this city wonderful and special.

You have the opportunity to put yourself on the right side of history and stand up for us.

Please don't disappoint the people of Portland, say no to the destruction of Forest Park and oppose this land permit!

Sincerely,

Maddy Gehr  
824 ne Stafford st  
Portland, OR

**From:** [Khaliun Haliun](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Refusing Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 11:18:41 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Khaliun Zych (36 years old, mother)

Zander Zych (9 years old, my son)

We enjoy our forest walks. It soothes our emotions and learn nature together helps our mother and son connection. We would love to keep Forest Park as it is now!

**From:** [Luca Soto](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment : forest park  
**Date:** Tuesday, December 3, 2024 11:20:10 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

I would also like to share more personal reasons as to why Forest Park is worth protecting. This sacred space has been a refuge for me on my darkest days and even on joyful ones. When I feel lonely and disconnected, going for a walk or run in forest park has always left me feeling nourished, gives me bits of peace even on days where my mind can find no rest. The ecosystems and wildlife within this park have many tangible and intangible benefits. Trail running is such a big part of my life, of my mental, emotional and physical health and I don’t take for granted the close access I have to forest park and I would be deeply impacted by the clearcutting of such a sacred space as I imagine others like myself would be. I hope people can reflect on the magnitude of negative impact it can have to set a precedent of not protecting Forest Park.

Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Luca  
(he/him/el)

**From:** [Forrest Camire](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defending Forest Park from PGE Harborton Clear Cutting  
**Date:** Tuesday, December 3, 2024 11:23:57 AM

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Hello Morgan and Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

I am a Portland resident, parent, and passionate community member who has benefitted from the natural resources that is Forest Park. My child, family, friends, and community also benefit from this park and we are disturbed by the precedent that would be set by beginning to log Forest Park for sake of this misleading project. I implore my local government to stand courageously for its constituents against Intel and the other large monied interests pushing for this project.

Best,

Forrest Camire

**From:** [Paulina J-R](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Letter of opposition to PGE's power line expansion  
**Date:** Tuesday, December 3, 2024 11:30:44 AM

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Dear Morgan and Christine,

I was born in Portland and have been living here as an adult for the past 13 years. Forest Park is an incredibly precious place to me, whether I'm walking in it or not. I value it as a space to go for supporting my mental, physical, and emotional wellbeing. And I also love to see its expanse from most parts of the city, appreciate its beauty, and know that it is such a rich habitat for many organisms. Protecting this land is so important as capitalist endeavors are ever overreaching. Forest Park is an invaluable, free space that Portlanders and visitors can go to celebrate and learn about nature and develop a sense of concern for conservation. In addition to its inherent value, it also creates the opportunity for those who do not have the financial resources or vehicles to go out of Portland to feel the experience of peace that is being out of the city.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts on Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas very precious to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Warm regards,

**Paulina Jaeger-Rosete**  
*she/they | ella/elle*  
503.758.2028

**From:** [ZZ Lundburg](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment - Deny the PGE Land Use Permit  
**Date:** Tuesday, December 3, 2024 11:31:59 AM

---

Hello -

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. Not only does this permit go directly against the Forest Park Natural Resource Management Plan, but it also is in direct contradiction to what is best for Portland residents and preserving the parts of Portland that bring people into this city.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular with Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. **These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.**

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.**

Protect our natural resources and the places/ecology that make this city so spectacular.

Makenzie Lundburg  
A resident of Portland, Oregon

Email: [makenzielundburg@gmail.com](mailto:makenzielundburg@gmail.com)  
Contact: (512) 983 3421

**From:** [Jesi Pick](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Comment  
**Date:** Tuesday, December 3, 2024 11:39:09 AM

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Hello

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you and take care,

Jesi Pick  
North Portland resident



**From:** [katlynn morin](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Do Not Cut Forrest Park  
**Date:** Tuesday, December 3, 2024 11:51:53 AM

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Hello,

As a Portland resident and native Oregonian. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** Jolynn Winter-Moshner <[jmoshner@gmail.com](mailto:jmoshner@gmail.com)>  
**Sent:** Tuesday, December 3, 2024 11:28 AM  
**To:** Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)>  
**Subject:** LU 24-401109 CU EN GW

Mr. Steele:

It is my understanding that PGE intends to run additional power lines through Forest Park to get more power to other parts of the city.

After looking over the various plans, my husband, Brad Moshner and I are in FAVOR of the Forest Park route.

We agree with the analysis that PGE's alternative plans could be very expensive and intrusive to surrounding neighborhoods. We believe that PGE prices are increasing enough as it is and the alternative plans would cost utility users even more money in the end.

We think the Forest Park plan is more than appropriate as they have taken measures to ensure a limited number of trees will be cut down but they will also be replanted. The Forest Park plan will also keep homeowner values in tact and is the most feasible option.

Thank you for taking our input.

Warmest regards,

Jolynn Winter-Moshner

Jolynn Winter-Moshner  
503-318-1918  
[jmoshner@gmail.com](mailto:jmoshner@gmail.com)

**From:** [Pdx](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny permit  
**Date:** Tuesday, December 3, 2024 12:21:08 PM

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**I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.**

**The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.**

**Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.**

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.**

**Amie and Greg Belisle  
Portland resident**

**From:** [Rubi Lori](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please deny the PGE powerline expansion - save forest park!  
**Date:** Tuesday, December 3, 2024 12:22:18 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I personally have grown up in the Portland metro area and deeply value forest park as a place to relax, connect with nature, spend time with friends and as haven for plants and animals. I ask that you prioritize our natural spaces and habitats over corporations that do not benefit our communities and actually result in less resources for us.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Rubi Vergara-Grindell  
Portland resident - 97211

**From:** [Sam Smargiassi](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Don't clear cut forest park  
**Date:** Tuesday, December 3, 2024 12:26:30 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Personal comment- I am a human that uses urban forests for my mental and physical well being. I have deep love and respect for creatures that survive off of the woods so near to our residential area. I also have concern for future clear cutting projects and do not want to see them start here.

Thank you,  
Samantha Smargiassi

**From:** [Zach Bowman](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Save Forest Park  
**Date:** Tuesday, December 3, 2024 12:31:04 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Jackie Syers](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** DEFEND FOREST PARK  
**Date:** Tuesday, December 3, 2024 12:32:11 PM

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To Whom It May Concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. We must protect our land before it is too late for humankind. Thank you for your consideration.

Best,

Jacqueline Syers

Sent from my iPhone

**From:** [Kara Bates](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment: Deny PGE's land use permit to clear cut Forest Park  
**Date:** Tuesday, December 3, 2024 12:38:50 PM

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Hello Morgan Steele and Christine Caruso,

As a Portland resident, I'd like to strongly urge you to deny Portland General Electric's (PGE) land use permit application for the proposed "Harborton Reliability Project" powerline expansion. This project poses significant threats to Forest Park and its surrounding ecosystem, undermining the park's management goals, disrupting wildlife habitats, and diminishing recreational spaces cherished by residents like myself.

The proposal includes clearcutting at least five acres of forest along the powerline corridor, a critical habitat for the imperiled Northern Red-Legged Frog and other critical species, while paving the way for PGE to continue clear-cutting an additional 15 acres of the park. Notably, the expansion would primarily serve the rapidly growing tech sector in Hillsboro, such as Intel's ongoing expansion, rather than Portland residents. While PGE claims this project is necessary for climate-related electrification, their data shows that the primary demand driver is from tech facilities and data centers—not the broader community. With Intel recently facing significant setbacks, including leadership changes and failed grant applications under the Inflation Reduction Act, this projected demand may not materialize. Sacrificing valuable forestland for speculative future needs is both risky and shortsighted.

Just last weekend, I hiked through Forest Park, appreciating its tranquility and vibrant wildlife. It is a treasured retreat for Portlanders and visitors alike—a rare natural sanctuary within our bustling urban landscape. I encourage anyone unfamiliar with the park's immense value to spend time there and witness firsthand what is at stake.

This project is incompatible with the Forest Park Natural Resources Management Plan with its goals of letting the forest grow into an ancient forest and enhancing its recreational/educational value. There are viable alternate routes outside Forest Park that will not threaten ecological integrity and community well-being. I respectfully urge you to deny PGE's land use permit and protect this vital Portland asset.

Thank you for your consideration.

Kara



**From:** [Dominika Wilczek](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park!  
**Date:** Tuesday, December 3, 2024 12:42:42 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

- Dominika Wilczek

**From:** [Faulkner Allocco](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** In Defense of Forrest Park against PGE clearcutting  
**Date:** Tuesday, December 3, 2024 12:55:02 PM

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My name is Faulkner Allocco and I am a resident of SE Portland.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you,  
Faulkner Allocco

**From:** [Clare Penny](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment: Opposition to PGE's Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 12:59:59 PM

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Dear Ms. Steele and Ms. Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the Harborton Reliability Project powerline expansion. As the City has previously noted, this project would cause significant ecological harm to Forest Park and the surrounding ecosystem, undermining the Park's management goals, harming bird and wildlife populations, and impacting recreational areas that are vital to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including areas that provide crucial habitat for the imperiled Northern Red-Legged Frog. These impacts are in direct conflict with the Forest Park Natural Resource Management Plan, which prioritizes the protection of sensitive species and habitats.

Additionally, the proposed powerline expansion will not benefit Portland residents. Instead, it will serve the rapidly expanding technology sector in Hillsboro, including large-scale facilities like the Intel expansion project. PGE has framed this project as necessary to meet growing electricity demand due to climate-smart electrification, but their own data indicates that the majority of the increased demand is driven by these tech facilities—not local residents.

As a Portland resident who values the ecological and recreational importance of Forest Park, I am strongly opposed to this project. PGE's proposal conflicts with the Forest Park Natural Resources Management Plan and prioritizes corporate interests over the well-being of our environment and community.

I respectfully urge you to refuse PGE's land use permit for the Harborton Reliability Project. Thank you for your time and consideration.

Sincerely,  
Clare Penny  
Portland, OR  
(She/Her)

**From:** [Juliet Stumpf](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 1:09:28 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

Good afternoon,

I write to request that you deny PGE’s land use permit for the Harborton Reliability Project. I am a Portland resident in part because Forest Park exists. Not only does it provide a singularly beautiful place to walk, but it is also a rare urban habitat that shelters a diverse community of plants, insects, birds, including the imperiled Northern Red Legged Frog.

Removing five acres or more of forest land along the powerline corridor to temporarily fulfill tech companies' growing electricity desires would be shortsighted. It will diminish habitat for this precious ecosystem and thereby diminish the quality of human lives. The negative impacts of this proposal are also directly in conflict with the Forest Park Natural Resource Management Plan.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents and because it fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit. Thank you for your consideration.

Juliet P. Stumpf, Sellwood resident

**From:** [patrick thoits](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** My Harborton Reliability Project public comment  
**Date:** Tuesday, December 3, 2024 1:11:31 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

And on a personal note, I live in Portland, and I use the trails in Forest Park year round. This impacts me personally, and would be extremely frustrating and disheartening to see yet another precedent set in the name of corporate expansion at the cost of the community and its shared spaces.

I hope you make the right choice for the people of the community, not the people in power.

Sincerely,  
Patrick Thoits

**From:** [Kennedy Birley](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 1:19:32 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric for the "Harborton Reliability Project" powerline expansion. As the city has previously noted, this project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

**I live in St. Johns for and have for the last two years. I am a frequent visitor of Forest Park and treasure the space. I am deeply saddened at the thought that trees and habitat would be harmed and irreparably damaged by this project.**

This project would require removing at least 5 acres of forest along the powerline corridor, and will pave the way for an additional 15 acres in coming years for further expansion. The area proposed for logging includes an area that provides crucial habitat for the imperiled Northern Red Legged Frog. **The lives of wildlife are not worth less than the expansion of infrastructure.**

It is known that the power line expansion is not meant to serve Portland residents, but instead create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro. PGE claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. In addition, these facilities are encroaching on vital farmland in Hillsboro, Through the CHIPS act we are likely losing 373 acres of farm land to the expansion of tech infrastructure. This land is vital to feeding people in the state and country, and it is our responsibility to not aid in the loss of farm land.

In addition to loss of farm land, this expansion directly correlates to US funded genocide. Companies such as Intel with major contracts with apartheid-state Israel only stand to gain from this action. We must resist supporting genocide, harming our local environment and the global environment, and listen to the wishes of the people. I strongly oppose this project for all the above reasons, and urge you to deny PGE's land use permit.

Thank you,  
Kennedy Birley  
Urban Farmer for Tiny Acre, based in St Johns Portland

**From:** [Hallie Stosur](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Please refuse PGE's land use permit through Forest Park  
**Date:** Tuesday, December 3, 2024 1:40:29 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

I am a Portland resident in part because Forest Park exists. It is a rare urban habitat that shelters a diverse community of plants, insects, birds, including the imperiled Northern Red Legged Frog.

Removing five acres or more of forest land along the powerline corridor to temporarily satiate tech companies' growing electricity needs is a terrible idea. It will diminish habitat for this precious ecosystem and thereby diminish the quality of human lives. The negative impact of this proposal is also directly in conflict with the Forest Park Natural Resource Management Plan.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents, and because it fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit. Thank you for your consideration.

Harriet Stosur  
Westmoreland resident

**From:** [Mary](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park Public Comment  
**Date:** Tuesday, December 3, 2024 2:03:29 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

As a Portland resident, Forest Park is one of my favorite places to access. It is rare to have wild spaces in the middle of a large city, and is one of the reasons I love Portland. Protecting this space is important for not only the humans who live here, but the entire ecosystem.

-Mary Vest



**From:** [Allison Leigh](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** NO CLEARCUTTING FOREST PARK, please  
**Date:** Tuesday, December 3, 2024 2:25:16 PM

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I am writing on behalf of the birds and the frogs and the trees to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. WE DO NOT WANT THIS

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration. I will absolutely lose my mind and chain myself to a tree if y’all try to proceed with this.

Thanks for listening,  
Allie

**From:** [Tara Meagher](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** no cutting in forest park !  
**Date:** Tuesday, December 3, 2024 2:28:23 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Tara Mar | [tara-mar.com](http://tara-mar.com) | [taramar.art@gmail.com](mailto:taramar.art@gmail.com) | +1 480-689-3251 | she/they

**From:** [Bryn Morgan](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** please defend forest park !  
**Date:** Tuesday, December 3, 2024 2:51:24 PM

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Hi,

My name is Bryn. I am a Portland native and while I currently live in California, Portland is home and that's because of the forests, the nature and the creatures. Forest Park is the heartbeat of Portland, it's what makes it so special. Please defend Forest Park and all of the beings who live there.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. **Please refuse PGE's land use permit.**

Thank you for reading and caring,  
Bryn

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Bryn Morgan (she/hers)  
Storytelling & strategy for brands  
[brynbryn.com](http://brynbryn.com)

**From:** [Kelly Pettit](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comment re: PGE's Forest Park clearcut  
**Date:** Tuesday, December 3, 2024 3:20:54 PM

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To whom it may concern,

As a resident of Portland, Oregon, I'm writing to urge Portland Permitting and Development to **deny** the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

Kelly Pettit  
(727) 710-0141

**From:** [Nora](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Tuesday, December 3, 2024 3:40:23 PM

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HANDS OFF FOREST PARK

EASILY THE BEST PARK IN PORTLAND

IT'S FANTASTIC HABITAT FOR SO MANY NATIVE SPECIES

ITS EXTENT SHOULD NOT BE REDUCED

**From:** [Jessica Vaughan](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** DEFEND FOREST PARK  
**Date:** Tuesday, December 3, 2024 5:16:55 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Jessica Vaughan

**From:** [Susan Moray](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park clearcuts  
**Date:** Tuesday, December 3, 2024 5:31:22 PM

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Ms. Steele & Ms. Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

S U S A N M O R A Y  
2 1 3 3 S E O R A N G E A V E  
P O R T L A N D, O R 9 7 2 1 4  
5 0 3 . 5 1 5 . 5 5 5 3

**From:** [Winds of Change](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Date:** Tuesday, December 3, 2024 5:34:29 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Ryan Guidry  
North Portland Resident



**From:** [Myranda Hudson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park Protection  
**Date:** Tuesday, December 3, 2024 5:56:23 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration

Myranda Hudson  
Hillsboro Resident and frequent Forest Park visitor

**From:** [kmeaganvogel@gmail.com](mailto:kmeaganvogel@gmail.com)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment for PG&E's Forest Park land use permit.  
**Date:** Tuesday, December 3, 2024 5:58:46 PM

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To Portland Permitting and Development,

Please deny the permit to PG&E that would allow them to destroy over 20 acres of critical habitat. Our natural land is precious.

PG&E can find another way to increase their power delivery without erasing any part of such a vital and treasured park.

The people of Portland would be heartbroken to watch their beloved forest within the city be eroded away by greed and carelessness.

Please, do your best to stop this development.

It is not worth what we would lose.

Thank you for your consideration.

K. Meagan Vogel  
Art, Design, and Craft  
(971)417-5851  
[kmeaganvogel@gmail.com](mailto:kmeaganvogel@gmail.com)

**From:** [RaineMan](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 6:39:52 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sent from [Proton Mail](#) for iOS

**From:** [Brenna Peck](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Opposition to PGE project in forest park  
**Date:** Tuesday, December 3, 2024 6:41:06 PM

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Hello,

I am writing to you to voice my opinion and urge you to not allow the PGE harbortown project in forest park to move forward. One of the things that makes our city so great are our trees and parks. we should continue to preserve these public lands for wildlife and future generations.

Sincerely,

Brenna Peck  
932 NE 23rd Ave  
Portland, OR 97232

**From:** [kathleen.bailey](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton reliability project  
**Date:** Tuesday, December 3, 2024 7:19:19 PM

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hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Kathleen Bailey

Sent from my iPhone

12/03/24

RE: Letter of opposition to PGE's power line expansion

Dear Morgan and Christine,

I was born in Oregon and have been living in Portland for 45 years. Forest Park is an incredibly precious place to me, whether I'm walking in it or not. I value it as a space to go to support my mental, physical, and emotional well-being. I also love to see its expanse from most parts of the city, appreciate its beauty, and know that it is such a rich habitat for many organisms. Protecting this land is so important as capitalist endeavors are ever overreaching. Forest Park is an invaluable, free space where Portlanders and visitors can go to celebrate and learn about nature and develop a sense of conservation concern. In addition to its inherent value, it also creates the opportunity for those who do not have the financial resources or vehicles to go out of Portland to feel the experience of peace that is being out of the city.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts on Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas very precious to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Sincerely,

Cynthia Jaeger, Ed.D

Please accept this email as my signature

**From:** [Soup Lips](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Concern about Forest Park clearcutting by PGE  
**Date:** Tuesday, December 3, 2024 7:23:24 PM

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Hello, my name is Tanner. I am a resident of Portland, and i am an avid camper and lover of nature.

I am messaging you, with the utmost respect for you and your job, to express my profound concern about PGE's proposed plan to clear cut 5 to 20 acres of forest in Forest Park.

I (and many others around here) have a very deep connection to nature. Places like Forest Park make Portland unique. It is a safe haven for people and animals alike. There are trees in there over 100 years old, and endangered creatures. The health of this forest is important, every square inch of it. I wish i could better describe how important and sacred Forest Park is to myself and many others. It brings me to tears just writing this.

I respectfully beg you, from the bottom of heart, please hear us, and consider denying this plan and not allowing these business people to destroy one of the last vestiges of life and nature in this area. We have lost so much of our forests already throughout the Pacific Northwest. The idea of cutting so much forest inside of Forest Park, a respite from the difficult and stressful city life, to expand business and benefit a very small percentage of people is heartbreaking.

This project is not essential for our communities, and everybody knows it. I truly believe we cannot afford the ecological and morale impact of cutting any more local forest. By morale impact, i mean that today's society is already draining, stressful, and difficult for most of us. It's hard to have high morale when you work all the time and live paycheck to paycheck. Places like Forest Park are one of the only places where i can reconnect with nature nearby and feel calm and happy. Destroying this sacred place will hurt all of us Portlanders, alongside the plants and creatures that live in the proposed cutting area.

We are at a turning point right now. If we open the door to allow projects like this to happen, one day, we will have no Forest Park for our descendants. There will only be a shadow of what once was.

Thank you for hearing us and considering our collective concern. I imagine that these decisions aren't easy, but I hope you fine folks will consider our pleas. We appreciate you.

A fellow Portlander,  
Tanner

**From:** [nicole.jenkins](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE FOREST PARK CLEAR CUT CONCERNS  
**Date:** Tuesday, December 3, 2024 7:29:08 PM

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Hello there, my name is Nicole Jenkins & I have lived in Portland my whole life. I'm writing to you today in hopes that you will be open to hearing the concerns of our community. I'm sure you have already gotten tons of emails detailing the relevant concerns of the community. So instead of copy and pasting the outlined concerns, I just want to ask that you please consider them with an open mind and open heart.

I could list many reasons why I believe this is extremely unethical, such as the environmental impact it will cause, all the wildlife, flora, and fungi that will be harmed or killed in the process, but like I said I'm sure you've gotten plenty of messages detailing the many reasons why this is unethical.

Instead, I will keep it fairly simple & say, have you asked your self, is this really necessary? What are the true motives of PGE? What kind of impact will this have on the environment & the community?

Forest park is a very very special place. There is nothing quite like it in all of the United States, & it is something that makes Portland a very unique and desirable place to live. I myself have countless memories there. I also think of all the people who don't have money to go out to visit other forests, however Forest Park is really accessible for people of lower income, since it is accessible by public transit. And you know, it's not just a nice place to visit, it is actually legitimately healing for people to go there. Lots of doctors prescribe "forest bathing" these days, and for low income folks that's the easiest access option.

It's quite obvious to me that the true motives of PGE are highly likely to be purely profit driven. So tell me, will you sleep well at night knowing you allowed them to destroy habitats and animals for their own gain? I know I wouldn't. In this world we only have so much forested areas left, and anything we do have should be kept in tact, not just for the survival of the inhabitants that live there, but also for our own well being.

Forest park is a gem, it's one of a kind. I guarantee you, if the whole community was consulted on this proposed plan, the vast majority of people would not agree with it. It's a shame that's not how things work. But I very much hope that you and your colleagues will consider our community's concerns.

I could go on and on about the concerns and nuances of this proposed project, but I don't want to talk your ear off too much. Like I said before, please be open to the concerns, and approach this with an open heart and mind, and question the true motives of this corporate expansion.



**From:** [Lark Granger](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Please say no to PGE's land use permit  
**Date:** Tuesday, December 3, 2024 7:37:14 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

Best,

Lark Granger  
Portland, OR 97201

**From:** [Casey McGrath](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest park clear cut  
**Date:** Tuesday, December 3, 2024 7:37:55 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

**From:** [Ariel Lenkov](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** DO NOT HARM FOREST PARK AND ITS WILDLIFE  
**Date:** Tuesday, December 3, 2024 7:42:33 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Ari Taylor,  
Lover of Forest Park

**From:** [Milana Orth](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Defending Forest Park  
**Date:** Tuesday, December 3, 2024 7:54:41 PM

---

Hi there

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Lena Randall](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please deny the land use permit to clear cut Forest Park  
**Date:** Tuesday, December 3, 2024 7:58:35 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Lena Randall, Oregon resident and student

**From:** [Teri Jacobs](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Don't cut trees in our precious Forest Park  
**Date:** Tuesday, December 3, 2024 7:59:48 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Teri Jacobs  
Portland, Oregon

**From:** [Sam Cim](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment Against PGE's Plan  
**Date:** Tuesday, December 3, 2024 8:13:18 PM

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Hello,

I hope this email finds you well. I am writing to submit a public comment to urge the Portland Permitting & Development to deny the land use permit being sought by PGE to cut down acres of Forest Park. This project would destroy crucial habitat for so many species, and would create a disruption in natural wildlife habitat. Moreover, expansion of the power line corridor threatens to exacerbate the spread of invasive species, posing a threat to the local ecology and increasing wildfire risk, which we surely do not need.

This power line expansion will not benefit Portland residents, only large tech. I am strongly opposed to this clear-cutting of the forest and acres of land so beloved by those who live here, and home to many species, including the red-legged frog that is an at-risk species. This project fails to comply with the Forest Park Natural Resources Management Plan, which as the main goals of letting the forest grow into an ancient forest, protecting and enhancing recreational and educational value, and PGE's project is not in line in any way with either of these goals.

I, like many others, am strongly opposed to this plan. Please refuse the permit, thank you for your consideration.

Thanks,  
Samantha Cimino

**From:** [Jessica Libonati](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** oppose PGE plan for Forest Park  
**Date:** Tuesday, December 3, 2024 8:14:37 PM

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Dear Morgan and Christine,  
Forest Park is so precious to us Portlanders. We need to defend it on behalf of ourselves and the beautiful ecosystem it supports. Please do not approve this project.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts on Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas very precious to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Warm regards,  
Jessica Libonati



**From:** [Artemis Wilder](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** SAVE FOREST PARK  
**Date:** Tuesday, December 3, 2024 8:43:43 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you,

Wren Wilder

**From:** [Sarah Mosher](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** No way PGE! We love our trees!  
**Date:** Tuesday, December 3, 2024 8:54:07 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Do the right thing portland!

Sincerely,



**Sarah Mosher** | *President*

**Sign Wizards**

(503)235-6967 Ext.207  
1111 SE Grand Ave. Portland, OR 97214  
Office Hours: Monday-Thursday 7:30am-4:30pm  
CCB#67127 | WBE#1264

**From:** [Jenna Vice](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE Land Use Permit  
**Date:** Tuesday, December 3, 2024 8:55:09 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

Future phases of the project could disrupt salmon habitat in the Miller Creek watershed. Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in the existing clearcuts, which poses a threat to the local ecology and increases wildfire risk. To prepare for the expansion of Intel and other high-tech companies in Washington County's Silicon Forest, the State of Oregon has changed land use laws to allow for corporate expansion into farmland outside Hillsboro, thus setting the stage for pushing out farmworkers in the region.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you,

Jenna Vice  
Portland Resident

**From:** [Erika Callihan](#)  
**To:** [Steele, Morgan](#)  
**Subject:** No to PGE's Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 9:00:59 PM

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I am writing to voice my vehement opposition to the proposed ecological destruction in our treasured Forest Park at the hands of PGE. Please do not allow this permitting to pass, which would counter the desires and values of our Portland community.

Erika Callihan

**From:** [Billie Weaver](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE and Forest Park  
**Date:** Tuesday, December 3, 2024 9:04:19 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Forest Park has provided me a valuable connection to my community and nature. Overall I can thank Forest Park for improving my happiness overall. Lastly, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Kate Connolly](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE's Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 9:04:30 PM

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Dear Morgan and Christine, I am writing to urge Portland Permitting and Development to **deny the land use permit** currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. I have been studying environmental engineering at PSU for over 3 years, and I know that clearcutting any part of forests would have wide-reaching detrimental effects on our environment and nearby residents for generations to come.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts directly contradict the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro, including facilities like the Intel expansion project. Although the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear from PGE's data that the vast majority of increased demand comes from these tech facilities. PGE claims their restoration plans are adequate, but the City of Portland stated in a letter that **PGE's proposed restoration plan would actually take a minimum of 80 years to mature**, would allow invasive species to flourish, and would fail to mitigate the long-term effects of clearing.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please **refuse PGE's land use permit**. Thank you for your consideration.

Sincerely,  
Portland resident of 97206 and regular Forest Park visitor

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Kate Connolly  
she/her  
B.S. Environmental Engineering, 2025  
[kc32@pdx.edu](mailto:kc32@pdx.edu)

(773) 220-8006



**From:** [Chloe Jaques](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project Public Comment  
**Date:** Tuesday, December 3, 2024 9:10:58 PM

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Hello,

I am writing because I am deeply concerned about the Harborton Reliability Project and its impact on the Forest Park ecosystem.

I live in Northwest Portland, and Forest Park is one of the only reliable ways for me to interact with nature and green space. I have some truly wonderful memories there, including a magical first date and eating the best sandwich of my life (a east coast-style sub on a Ken's Bakery baguette. Phenomenal.)

I work as a mental health clinician for high-acuity clients and I also struggle with mental health issues myself. Taking walks in Forest Park is one of the ways that I center myself, and remind myself that I am a part of a vast, beautiful, complex system of life.

I'm worried about what clear-cutting 5 acres will mean for the ecosystem of Forest Park. The section in question contains some lovely mature oaks, and is an important part of the northern red-legged frog habitat. PGE's restoration plan will take a minimum of 80 years, which doesn't align with Forest Park's Natural Resource Management Plan goal to let the forest grow into ancient forest. You gotta leave the trees along for a good long while to get that!

I urge you to refuse PGE's land use permit. Green space is vitally important and only shrinking by the day. Thank you for listening.

Best,  
Chloe Jaques



**From:** [Amanda Beaver](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Save Forest Park  
**Date:** Tuesday, December 3, 2024 9:12:32 PM

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Hi there,

My name is Amand Beaver. I live in Portland, I am a Multnomah county resident and I work in the tri-county area. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

We, myself - family - community, recreate in all areas of Forest Park multiple times a week and have used this green space regularly for 10+ years. It's a safe place to be outside that accessible for all people, especially those that use bike and public transportation. It's essential to keep these spaces protected for ALL and for future generations to come.

Please refuse PGE’s land use permit.

Thank you for your consideration.

**From:** [Nate Hughes](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Please Deny PGE's Land Use Permit for Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 9:14:56 PM

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Hello Christine Caruso,

I am asking you to please deny the land use permit currently being sought by Portland General Electric for the "Harborton Reliability Project." I am strongly opposed to the project due to its ecological and environmental impacts. Please refuse PGE's land use permit and help maintain this beautiful ecosystem.

Thank you for your consideration.

Best,  
Nate Hughes

**From:** [Joanna Cowan](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park!  
**Date:** Tuesday, December 3, 2024 9:15:36 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Joanna Cowan  
The Ford Building  
2505 SE 11th Ave.  
Suite # 356  
Portland, Ore. 97202

ph:503-805-2211  
[www.joannacowanlmt.com](http://www.joannacowanlmt.com)

**From:** [J'reyesha Brannon](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** LU 24-041109 CU EN GW: Public Comment Opposing the Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 9:16:03 PM

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Dear Portland Permitting and Development Team,

I urge you to deny Portland General Electric's (PGE) land use permit application for the proposed "Harborton Reliability Project." This project poses significant environmental, ecological, and economic harm to Portland residents and Forest Park's ecosystem, while primarily serving private industrial interests. The City of Portland has a long history of making land use decisions that benefit greed rather than people or environment. The approval of PGE's land use application would be a continuation of these decisions. PGE asserts this project is necessary for increased electricity demand driven by climate-smart electrification. However, the primary driver of this demand is the rapid growth of heavy industrial facilities in Hillsboro, such as Intel's multi-billion dollar chip-making plant. This project's costs are subsidized by residential ratepayers, who continue to be negatively impacted by PGE's egregious rate increases.

If approved, this phase of the project would clear-cut five acres of critical forest habitat essential for the Northern Red-Legged Frog, a species listed as sensitive by the state and of concern federally. The area includes riparian habitat, heritage oaks, and mature forest stands, which contribute to the ecological diversity of Forest Park. Future phases of the project threaten to clear-cut over 15 additional acres in Forest Park (more than the initial 5-acres as proposed by PGE), jeopardizing salmon habitat in the Miller Creek watershed.

Expanding the powerline corridor would also intensify the spread of invasive species already present in existing clear-cuts, further degrading the local ecosystem. This invasion increases wildfire risks, putting nearby communities and natural resources in danger.

The Forest Park Natural Resource Management Plan (NRMP) prioritizes two main goals:

1. Allowing the forest to grow into an ancient forest.
2. Protecting and enhancing its recreational and educational value.

PGE's project undermines these goals by disrupting sensitive habitats, recreational areas, and the park's ecological integrity. Moreover, there are viable alternative routes for the powerline project outside of Forest Park that have not been adequately considered, further demonstrating noncompliance with NRMP criteria.

Given the project's ecological devastation, misaligned priorities, and failure to meet Forest Park NRMP goals, I urge Portland Permitting and Development to deny this land use permit. Let's protect Forest Park's invaluable natural resources and stand against projects that prioritize corporate profits over community / environmental welfare.

Thank you.

J'reyesha Brannon

**From:** [Paul Collins](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment  
**Date:** Tuesday, December 3, 2024 9:18:50 PM

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This is the only issue ive ever emailed by portland government about.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Paul collins  
Portland  
8122167978  
Sent from my iPhone

**From:** [Siobhan O'Reilly](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park land use permit  
**Date:** Tuesday, December 3, 2024 9:23:17 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project -- in other words, fueling corporate expansion, colonial extraction, and genocide. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. This project is *not* for supporting energy needs of local communities, as PGE claims, but for supporting large tech companies like Intel on residential ratepayers’ dime. PGE's project, in its ties to Intel's expansion, would negatively affect and displace farm owners and workers in the area.

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents.** Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Forest Park, the past and future it represents, is a huge part of what drew me to Portland in the first place. **Please refuse PGE’s land use permit.** Thank you for your consideration.

Sincerely,  
Siobhan O'Reilly  
Sunrise PDX Co-Hub Coordinator, Portland Resident

**From:** [Hales Niss](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Public comment: Forest Park and PGE  
**Date:** Tuesday, December 3, 2024 9:23:55 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration,  
Haley Nisson  
Portland Resident (Irvington Neighborhood, 97212)  
PCC Student



**From:** [Sinead C](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please reject permits for "HARBORTON Reliability Project"  
**Date:** Tuesday, December 3, 2024 9:24:14 PM

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Hi there,

I urge Portland Permitting and Development to reject the land use permit requested by Portland General Electric (PGE) for the “HARBORTON Reliability Project” powerline expansion. This project poses severe environmental consequences for Forest Park and its surrounding ecosystem, jeopardizing wildlife populations—including the threatened Northern Red-Legged Frog—damaging recreational spaces cherished by Portland residents, and conflicting with the Forest Park Natural Resource Management Plan. The proposal involves clearcutting over five acres of forest in critical habitat areas, undermining conservation goals and ecological integrity.

Furthermore, the project does not serve the interests of Portland residents. Instead, it appears to prioritize expanding energy infrastructure for Hillsboro’s rapidly growing technology sector, including projects like Intel’s facility expansion. While PGE frames this expansion as necessary to support climate-friendly electrification, their data shows that the increased demand stems predominantly from large tech facilities, not local residential needs.

**It is crucial for leaders to stand against harmful corporate-driven projects like this one, which prioritize profits over the environment and the well-being of our community. For the sake of our planet and future generations, I strongly urge you to deny this permit.**

Thank you for your consideration.

Sinead Cowan-Kuist  
SE Portland Resident

**From:** [mj bzdak](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** no to clear cutting forest park by PGE  
**Date:** Tuesday, December 3, 2024 9:28:42 PM

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I live in Portland and frequent forest park and I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

melissa j. bzdak  
portland, OR resident

**From:** [Madi Welch](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please refuse PGE's land use permit  
**Date:** Tuesday, December 3, 2024 9:33:40 PM

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Hi Morgan and Christine!

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. My family and I have hiked nearly every bit of the Wildwood trail and Forest Park is a place we hold dear to our hearts.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan which aims to let the forest grow into ancient forest and to protect and enhance the recreational and educational value of the park. PGE's project is not in line with either of these goals.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

In it's ties to Intel's expansion, PGE's project would negatively impact and displace farm owners and workers in the area. To prepare for the expansion of Intel and other tech companies in the Washington County "Silicon Forest", the State of Oregon has changed land use laws to allow for corporate expansion into farmland outside Hillsboro, thus setting the stage for pushing out farmworkers in the region.

In looking into this project proposal, as well as attending community meetings and discussions with PGE representatives, it is clear to me that PGE's interests do not lie in what is best for Portland residents or the environment we are surrounded by. I am strongly opposed to this project primarily due to its ecological and economic impacts on myself and other (greater) Portland residents. Please refuse PGE's land use permit. Thank you for your time and consideration.

Wishing you well,

Madi Welch  
Portland resident

**From:** [Hayley Darien](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE's Forest Park clearcuts  
**Date:** Tuesday, December 3, 2024 9:37:23 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration .

Sincerely,  
Hayley

**From:** [Joel Johnson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Conserve Forest Park  
**Date:** Tuesday, December 3, 2024 9:40:54 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

SE Portland/Sellwood neighborhood resident,

Joel Johnson

**From:** [Glenna](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** STOP PGES FOREST PARK CUTTING  
**Date:** Tuesday, December 3, 2024 9:41:36 PM

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My name is Glenna Hayes and I have been a resident for over 14 years. I am 36 years old and work on the PGE equity and diversity committee as well as a disability advocate and many other committees. I am writing because this project is a huge violation of equity, community and the environment.

Time and time again people pick big business and development over humanity.

We need land that is not decimated by development otherwise we would have nothing left. We are facing a major climate crisis and cutting through an area that has tons of species of animals including an endangered frog species would have permanent lasting impacts.

We are unfortunately forced into a monopoly of who I can get my power from otherwise this decision, along with other dismissals on climate impacts would mean my business would be elsewhere.

Please stop this project. None of us who live in the area want this and what you are proposing is disgusting to our humanity and future.

**From:** [Melissa Godshalk](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Preserve Forest Park  
**Date:** Tuesday, December 3, 2024 9:42:01 PM

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Hello, I live in North Portland and am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

**PGE has alternative locations available for these power lines that were detailed to them in a report from Toth and Associates, which they have chosen not to adequately explore.**

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents like myself.

The project would require the clear cutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Emily Daman](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment - PGE Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 9:42:26 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

As a resident who spends time enjoying the natural beauty that Forest Park offers, I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Emily Daman  
Portland resident



**From:** [Stephanie Taylor](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment to Deny PGE Permit  
**Date:** Tuesday, December 3, 2024 9:48:00 PM

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To Whom it May Concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Stephanie Taylor  
Lifelong Portland Resident

**From:** [Mira Lee Collins](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Saying No to the Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 9:51:53 PM

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This email is serving as my public comment to urge Portland Permitting and Development to stop the incoming “Harborton Reliability Project” powerline expansion.

I have lived in Portland my whole life, over 20 years, and have many fond memories in Forest Park — memories I hope I continue to build in the years to come. It’s so wonderful to have a vast and ecologically diverse natural area so close to the city, and I believe that wonder is worth protecting.

The City itself previously noted the Harborton Reliability Project would cause detrimental impacts to Forest Park and the ecosystems it is anchored to. Forest Park and the surrounding areas are home to various birds and other wildlife, as well as recreational areas intended for Portland’s human residents to enjoy. The clearcutting this project requires would directly endanger the inhabitants of Forest Park, namely the Northern Red Legged Frog which is already at risk.

I worry that this project, particularly PGE’s involvement, is more of a benefit to tech companies like Intel rather than serving Portland residents. I believe that if a project claims to have the climate in mind, that its planning should involve the protection of the land and its inhabitants. Based on the current proposal, it will not do so — it even fails to comply with the Forest Park Natural Resources Management Plan.

I am one of many Portland residents who feel strongly opposed to this project. If it is intended to serve us and Portland at large, I hope you will fight to protect the land and those most impacted.

Thank you,  
Mira Collins

**From:** [Sophie](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment  
**Date:** Tuesday, December 3, 2024 9:52:54 PM

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Dear Morgan and Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sent with [Proton Mail](#) secure email.

**From:** [Sara Reschke](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Save Forest Park  
**Date:** Tuesday, December 3, 2024 9:56:59 PM

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Hi Christine-

Forest Park has long been an outdoor refuge for residents of the greater Portland area. In addition , it harbors abundant wildlife that deserves our attention, respect and care.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Please choose people’s health and the delicate balance of our ecosystem, over the profit and expansion of Intel.

There can be a better solution.

Sincerely,  
Sara Reschke  
18-year Wilsonville resident

**From:** [Daniel Athay](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Tuesday, December 3, 2024 9:57:27 PM

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Christine,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland Residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor including in an area that provides crucial habitat for the imperiled Norther Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro, including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

Approving this project would be a tremendous mistake and an embarrassment for the City of Portland. I love Forest Park, and I place significant value on its protection. I support Forest Park Conservancy and ask that you refuse PGE's land use permit.

Thank you,  
Daniel Athay

--

**Daniel J Athay**  
Designer | Assoc. AIA  
M.Arch, Portland State University  
503-314-1228  
[DanielAthay](#)

**From:** [Chase Allbritton](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition to Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 10:02:50 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Chase Allbritton  
Portland Resident

**From:** [John Harrigan](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Objection to Harborton Reliability Project  
**Date:** Tuesday, December 3, 2024 10:06:02 PM

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Hello,

As a lifelong Oregonian and someone who wants to preserve our forests for generations to come, I am writing to urge Portland Permitting and Development to deny the land use permit for PGE's 'Harborton Reliability Project' power line expansion.

Despite claims that the project is needed for the region's growing electricity needs, PGE's data shows that tech facilities account for the vast majority of this increased demand. Ultimately, large companies like Intel will reap most of the benefits, while Portland area residents have little to gain.

More importantly, this project threatens bird and other wildlife habitat and is in clear violation of the Forest Park Natural Resources Management Plan (NRMP). A chief goal of the NRMP is to let the forest grow into ancient forest, something the Harborton Project would jeopardize.

Finally, we need to reckon with the fact that there is only so much of our natural areas that we can destroy in the name of economic interests before we incur serious consequences. Forest Park is an urban wonder and we owe it to future generations to maintain it so that they may experience its splendor.

John Harrigan  
Bookseller, Powell's City of Books

**From:** [Katelyn Hall](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment: PGE Forest Park  
**Date:** Tuesday, December 3, 2024 10:10:20 PM

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## Public Comment Regarding PGE's Forest Park Proposal:

As a soon-to-be mother, Portland resident, and outdoor enthusiast who treasures Forest Park, I am urging Portland Permitting and Development to deny Portland General Electric's (PGE) land use permit for the proposed "Harborton Reliability Project" powerline expansion.

This project would severely harm Forest Park and its surrounding ecosystem, as the City has previously noted, undermining the park's management goals, disrupting wildlife—including birds and the Northern Red-Legged Frog—and affecting popular recreational areas that many Portlanders, including myself, deeply value.

The plan involves clearcutting at least five acres of forest along the powerline corridor, threatening critical habitats that Forest Park is meant to protect under its Natural Resource Management Plan. It is particularly concerning that many trees over 150+ years old would be clear cut, as well as the loss of two water areas that are home to protected frogs, flora and fauna. This proposal stands in direct conflict with the established protections that Forest Park was founded upon.

Additionally, this project offers no meaningful benefits to Portland residents. Instead, it would primarily serve the growing energy demands of tech facilities in Hillsboro, such as the Intel expansion. While PGE claims this expansion supports climate-smart electrification, their data clearly shows the increased demand is largely tied to these industrial operations—not Portland households or communities.



For these ecological, economic, and policy reasons, I strongly oppose this project and urge you to deny PGE's permit request. Please protect Forest Park so our children can grow up enjoying the beautiful green spaces West Portland has to offer.

Thank you for taking the time to consider the voices of those who care deeply about our city and its natural spaces.

Thanks,  
Katelyn Hall Fuchs  
Portland Resident

**From:** [Hildi Harrington](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest park clear cut  
**Date:** Tuesday, December 3, 2024 10:12:25 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Amanda Weber-Welch](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Please do not approve PGE's De-Foresting Park plan  
**Date:** Tuesday, December 3, 2024 10:14:45 PM

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As a longtime Portland resident, Forest Park user, and public school educator, I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. **We need to prioritize the protection of our natural spaces-- as a person who has personally walked the full Wildwood Trail, this is precious, irreplaceable land that is important to our local and broader community. At Cleveland High School, where I work, students have nurtured a strong Transit to Trails Club, which helps students and teachers to find ways to access wilderness spaces via public transit. This is part of what makes Portland sustainable and beautiful.**

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Amanda Weber-Welch and William Welch  
1725 SE 16th Avenue  
Portland, OR 97214  
503-502-7425

**From:** [Sarah Richmond](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park Land Use Permit  
**Date:** Tuesday, December 3, 2024 10:16:39 PM

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Hello,

My name is Sarah Richmond; I have been a Portland resident for 9 years and lived in Oregon for most of my life. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Portland prides itself on being a city that values sustainability and respect of our lands, this proposal is in complete violation of those values. Thank you for your consideration.

Sincerely,  
Sarah Modene Richmond

**From:** [Jahnavi Veronica](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park - Deny the "Harborton Reliability Project" Powerline Expansion!  
**Date:** Tuesday, December 3, 2024 10:18:53 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration.

-Jahnavi Hastings  
Portland resident

**From:** [Sarah Gilbert](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please say no to the Harborton Reliability Project power line expansion  
**Date:** Tuesday, December 3, 2024 10:22:10 PM

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I hope you are getting many emails about the land use permit being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. I am writing to add one more voice to demand you deny the land use permit and protect our forest, our ecosystems, and our vulnerable species. We have such a small time on this earth and we have already wrought such irreversible damage to the ecosystems. We have filled in sensitive wetlands to build industrial parks. We have done worse: we have filled in wetlands, built upon them shipyards where we made weapons of war; millions of soldiers were sacrificed and millions more vulnerable people the world round. Once the war was over, we decommissioned those vessels on our concrete- and gravel-laden wetlands, dumping so much poison in the river that it is still one of the 10 most polluted areas in the country.

We have slashed and uprooted forest after forest for “progress,” for profit, for the riches that let our current mayor climb Mount Everest. Our shipyards have sent our precious firs and cedars to be manufactured into buildings to be knocked down and toilet paper to wipe generations of butts. We have filled rivers with lead with our acidic water (exacerbated by the lack of rich and complex forests). After all that we got wrecking balls and knocked down the neighborhoods where the undesirables lived — the Japanese immigrants, the Jewish people, the Roma people, the Black Portlanders.

You I’m sure have heard over and over from the giant companies that charge the poor of Portland every year, “we need this,” and “progress,” and “economic growth.” They talk of billions of dollars of “activity” that will “serve Portland.” Meanwhile the ex-CEO of Intel counts his 12 million dollar payday for quitting. Does the new Blackrock-installed management even care about our rivers, our frogs? They don’t stay here long enough, it passes through their email, they skim maybe. Their eyes glaze over, they think of forests in some paradise the people who live here can’t afford.

Maybe you’re blind now to this argument of protection. Do you say, “another hippie”? Do you see our cause as doomed or intensely important? Do you care about our forests and rivers and frogs too? Do you, as an Indigenous elder exhorted, thank the river every time you cross it? Do you touch the trunks of the trees when you walk through the forest, in awe at all they have seen and known?

The City itself has said, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit. If you thank the rivers and trees, if you want us to have an impact on this land that future generations will not mourn, if you too watch the sun sparkling through the tree tops on those perfect spring days and see the most intense kaleidoscope from the most ancient artist of all — if you too are lost in the spiraling fractals —



**From:** [Kyla Kelsay](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Land Use Permit Public Comment  
**Date:** Tuesday, December 3, 2024 10:26:52 PM

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Good evening,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. I have hiked and hope to continue to hike Forest Park for the rest of my life. In its unobstructed state.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan which aims to let the forest grow into ancient forest and to protect and enhance the recreational and educational value of the park. PGE's project does not align with either of these goals.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

In its ties to Intel's expansion, PGE's project would negatively impact and displace farm owners and workers in the area. To prepare for the expansion of Intel and other tech companies in the Washington County "Silicon Forest", the State of Oregon has changed land use laws to allow for corporate expansion into farmland outside Hillsboro, thus setting the stage for pushing out farmworkers in the region. And with the mass layoffs of the last year, we can't even justify these sacrifices for the cause of "creating jobs."

I have been a resident of Helvetia and Washington county my whole life. I struggle to comprehend the changes I've seen in the area due to development forced upon the area. The absolutely explosion of shipping centers have only increased emissions and traffic. The new data centers and expansion of Intel operations have literally changed the color of the sky. It does not get dark anymore.

I have gradually encountered more dead deer, raccoons, skunks, and other wildlife in the last ten years because of the boom in development of low quality housing in North Plains and Bethany, which have decimated wildlife habitats.

In looking into this project proposal, as well as attending community meetings and discussions with PGE representatives, it is clear to me that PGE's interests do not lie in what is best for Portland/ Washington county residents or the environment we are surrounded by. I am strongly opposed to this project primarily due to its ecological and economic impacts on myself and other Oregon residents. Please refuse PGE's land use permit. Thank you for your time and consideration.

Best,  
Kyla Kelsay  
97124



**From:** [Natalie D'Amour](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Date:** Tuesday, December 3, 2024 10:27:14 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Cynthia King](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Defending Forest Park  
**Date:** Tuesday, December 3, 2024 10:27:30 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

I personally am an avid hiker at Forest Park. I’m gutted to think this might happen. Please, Please consider saving our park. Our Forest in our city. One of the many things that makes the city Portland.

Sincerely, Cynthia King  
Portland resident

**From:** [Robin Hand](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Please deny PGE's land use permit  
**Date:** Tuesday, December 3, 2024 10:28:46 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Johanna Robin Hand

**From:** [Carolyn Bryant](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please \*PLEASE\* deny PGE's land use permit  
**Date:** Tuesday, December 3, 2024 10:34:22 PM

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Hello!

My name is Carolyn Bryant.

I have lived in Portland for two years, the last 1.5 years specifically in Northwest. As of yesterday I signed a 13 month lease to a different apartment complex just a few blocks away. I am telling you this because my number one reason for moving to this area originally and continuing to stay in this area is Forest Park. I'm not exaggerating, being able to have city amenities in one direction and yet still WALK the other direction into a 5,200 acre forest is priceless to me. Not just an urban park, sure those are nice but what city doesn't have a dozen of those, but a FOREST, it makes Portland unique.

I use Forest Park for hiking and running, catching up with friends and solitude, for fungi identification and bird listening. I go at least twice a week, ideally more, year round. Regular winter hiking in Forest Park last year was one of the happiest winters of my life, besides maybe the couple of seasons I worked at a ski resort. I have seen owls and deer, protected snails and slugs as they crossed the trail. I have marveled at sections of sword ferns or maidenhair ferns that are so pristine, especially considering they are within city limits. I have cried on foggy mornings with the sun shining through the Douglas Firs and Western Hemlocks. I have taken photos of over 100 different mushrooms within Forest Park. I get to point out and teach my friends about Oregon Grape or Trilliums or Thimbleberry while we share coffee.

It may seem like I am rambling, but I need you to understand the depth of that Forest. I need you to see that this can't be watered down to "X amount of acres". We are talking about an ecosystem. We are talking about animal's habitat, their shelter, their home. We are talking about watersheds that lead to the Willamette. We are talking about trees that can live hundreds of years (even over 1,000 years for some of the species in FP) all the while benefiting the soil, the watersheds, the animals, the plants that thrive in their shade, and us - the very air we breathe. We are talking about local businesses and local economy getting stimulated because people WANT to live here, we want to swing by a small coffee shop before birdwatching, we want to get lunch with a friend after going for a run on Wildwood, we want to pick up snacks at the grocery store for our bike ride on Lief Erickson, we want to try out those new shoes for those rainy muddier outings.

Over a year ago now I started volunteering with Forest Park Conservancy. Started with just trail maintenance work, then I attended FPC Ambassador training, then Rapid Response training. I have pulled ivy, removed holly, picked up trash, raked leaves, brushed (cutting back vegetation to ensure the trail isn't overgrown / the trail doesn't become unevenly worn), sat at trailheads during the summer to educate others and answer questions, lead group hikes, taken educational class hikes, hiked trails after inclement weather to report down trees or other issues.

So many people like me love this Forest so much we not only spend personal time their outside of our jobs and other hobbies and home life, we volunteer there to take care for it, to give back to it.

So I imagine you can understand how it feels like a slap in the face that after caring so deeply it could just be "given" away to bulldozers for something that will cause more destruction,

environmental harm, loss of peace and solitude, and taxpayer's money than it is worth.

Now to the more specifics:

**- If approved, this next phase of the project would clear-cut 5 acres of forest habitat** that is critical for red-legged frogs and other protected species, while paving the way for PGE to continue clear-cutting over 15 additional acres in Forest Park.

This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands. The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern.

Future phases of the project could disrupt salmon habitat in the Miller Creek watershed

Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in the existing clearcuts, which poses a threat to the local ecology and increases wildfire risk.

**- The project fails to comply with the Forest Park Natural Resources Management Plan (NRMP)**

The NRMP's main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE's project is not in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project *outside* of Forest Park.

**- This project is *not* for supporting energy needs of local communities, as PGE claims, but for supporting large tech companies like Intel on residential ratepayers' dime.**

PGE is focused on expanding transmission and energy generation infrastructure to meet the demand of rapidly growing industrial facilities, such as Intel's new \$36 billion chip-making plant in Hillsboro, which would consume roughly as much electricity as 50,000 homes.

PGE has repeatedly raised energy costs for ratepayers while subsidizing energy costs for large tech industry facilities.

Thank you for your time!

Sincerely,  
Carolyn Bryant  
(Concerned Portland resident and Forest Park Conservancy volunteer)



**From:** [Emily Waldron](#)  
**Subject:** Comment on logging in Forest Park for PGE  
**Date:** Tuesday, December 3, 2024 10:35:49 PM

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Hello,

I would like to submit a comment in opposition to the proposed logging of 20 acres of land for PGE to develop a new path for power lines.

The song lyric that comes to mind is “they paved paradise and put up a parking lot”. We have a true gem in Forest Park that no other city has, and it needs to be preserved. Losing 20 acres of old forest will have an impact on the forest, both trees and the animals that call the forest home, as well as the struggles along the hills to prevent landslides (just look at all the work done along the St John’s Bridge ramp to try and prevent more landslides).

Removing those trees will impact us all for the worse. To start, the trees along the cut will suffer as their environment changes. More invasive a such as blackberries will pop up, and native plants that depend on the extra shade will die out.

Then the animals. I will never forget the breath-taking experience of encountering an elk while out on a snowy walk in Forest Park. The heart of a major city and it was just silent as I stood looking him in the eye 10 feet away. Experiences such as that will become rarer as more continuous forest is lost.

Then the impact on the people. Forest Park is a heavily used park. Thousands of people hike, bike, run, and play along the trails every weekend. As the world gets darker (literally and figuratively) these havens of nature become invaluable to keeping us healthy both mentally and physically. How many Portlanders view time in nature as their “church” to connect with something greater?

I live outside of Hillsboro, in unincorporated Washington county. These power lines aren’t being put in for us residents and rural communities. They are being put in to satisfy intel’s power demands for an expansion that likely won’t even happen. Why are we not challenging intel to use their energy more efficiently? Or to come up with less impactful ways to get their power? Will Intel even be building the plant? Because with layoffs, CEO resignations, and their CHIPS grant looking iffy it appears that the city is considering destroying an invaluable piece of nature for private corporations with no guarantee it serves any purpose besides greed and a maybe of more jobs.

So please, turn this ask down. Prevent PGE (a private company) from harming Forest Park (a public treasure) to benefit corporate interests (more private business). The public’s assets cannot be sold off to increase the coffers of billionaires and millionaires. I’m not sure how I can look my children in the eye and tell them their love of the forest doesn’t matter as much as the wealthy making more money.

Thank you for your time

Emily Waldron

Sent from [Proton Mail](#) for iOS

**From:** [Galen Hanly Hefferman](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please deny PGE a land use permit for powerline expansion through forest park.  
**Date:** Tuesday, December 3, 2024 10:36:43 PM

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Hello Morgan and Christine,

I am writing because I grew up and live in Portland, and consider forest park to be one of the places that makes Portland livable for human and non human lives alike. I was recently made aware of the proposal by pge to cut multiple acres of forest park to expand power lines. There are alternative routes, and being of such irreplaceable value, I am strongly opposed to this project. As always, the future rests in the hands of those in power. I am attaching some words below that express what I feel very adequately. I would like to see the rights of nature to exist, persist, and maintain natural cycles be brought into play in these decisions.

"I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration."

Please deny the land use permit for the Harborton Reliability Project.

Sincerely,

Galen Hefferman



Portland resident, local artist, and environmentalist.

**From:** [Onyx Baird](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Protect Forest Park  
**Date:** Tuesday, December 3, 2024 10:40:10 PM

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Dear Christine + Morgan,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Ashley Baird  
4416 SW Lobelia St Portland, OR

Honeybee Conservationist & Filmmaker  
*M.S. Fisheries & Wildlife*



**From:** [Brittney Baldwin](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Stop PGE from harming Forest Park and Wildlife  
**Date:** Tuesday, December 3, 2024 10:43:22 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Brittney Baldwin

**From:** [Henry Huntington](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Please deny PGE's land use permit  
**Date:** Tuesday, December 3, 2024 10:54:25 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Thanks,  
Henry Huntington

**From:** [Lucy Breuer](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Deny PGE's Land Use Permit for the Forest Park Project  
**Date:** Tuesday, December 3, 2024 10:58:19 PM

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Dear Christine Caruso,

As a concerned student and community member, I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. This section of forest is next to the Harborton frog crossing and contains riparian habitat crucial to that of the northern red-legged frog, listed as a sensitive species by the state of Oregon. Future phases could disrupt salmon habitat in the Miller Creek watershed, and exacerbate the spread of invasive species.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Lucy Breuer

**From:** [Georgia Sedillo](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** SAY NO TO PGE CLEARCUTTING FOREST PARK  
**Date:** Tuesday, December 3, 2024 11:07:08 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Georgia Sedillo, Portland Resident

**From:** [Rachael Malone](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Protect Forest Park  
**Date:** Tuesday, December 3, 2024 11:12:40 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Peter Ryan](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Tuesday, December 3, 2024 11:28:37 PM

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**Please don't allow Forest Park to be damaged.**

**I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.**

**The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.**

**Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.**

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.**



**From:** [J Wright](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Re: public comment regarding PGE / Forest Park  
**Date:** Tuesday, December 3, 2024 11:29:13 PM

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Hi there,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the Harborton Reliability Project powerline expansion.

Forest Park is an irreplaceable treasure that makes Portland worth living in for me. I walk its trails several times a week with my dogs, soaking in the peace and beauty of this rare urban wilderness. I love the native plants that thrive here and the incredible habitat they create for insects, birds, reptiles and other animals. It's a space that nurtures both the ecosystem and the community, offering a refuge from the relentless development that has encroached on nearly every other green space in the city.

The Harborton Reliability Project would devastate this precious resource. It would require the clearcutting of at least five acres of forest along the powerline corridor, including critical habitat for species like the imperiled Northern Red-Legged Frog.

These actions directly conflict with the Forest Park Natural Resource Management Plan, undermining its goals and harming the wildlife populations that depend on this ecosystem. The project also threatens the recreational value of Forest Park, which so many Portland residents treasure.

Furthermore, this project doesn't serve the people of Portland. It's not about meeting local demand for climate-smart electrification, as PGE claims. Instead, their own data shows that the increased energy demand driving this expansion comes from the rapidly growing tech sector in Hillsboro, including projects like the Intel expansion. Forest Park and its ecosystem should not be sacrificed for private sector gains far removed from the residents who cherish this park.

I strongly oppose this project for its ecological, economic, and personal impacts. Forest Park is more than just a green space—it's a lifeline for Portland's people and wildlife, and it must be protected.

Please deny PGE's land use permit and preserve this irreplaceable piece of Portland's identity.

Thank you for your consideration.

Jordana Gustafson Wright  
9690 NW Cornell Rd, Portland, OR 97229  
Tel. 805-798-7230

**From:** [cel](#)  
**To:** [Caruso, Christine](#)  
**Subject:** DEFEND FOREST PARK  
**Date:** Tuesday, December 3, 2024 11:38:39 PM

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Hello. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

- **The project fails to comply with the Forest Park Natural Resources Management Plan (NRMP)**

The NRMP’s main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE’s project is not in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project *outside* of Forest Park.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration. FREE PALESTINE, fuck intel

**From:** [Avi Zinn](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Against PGE expansion  
**Date:** Tuesday, December 3, 2024 11:39:01 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Mercury Marz Baxley](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Do Not Approve PGE's Forest Destruction for Powerlines  
**Date:** Wednesday, December 4, 2024 12:28:47 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Though they can't vote for you, the trees, frogs, moss, fungi, lichen and more that call this forest home have to rely on you to protect them. Please consider protecting one of the few physical reminders of what this ecosystem was like before it was all logged, burned, ravaged, and destroyed all in the name of 'progress'.

Please refuse PGB use permit. Thank you for your consideration.

Mercury Baxley

**From:** [Justin](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park Public comment  
**Date:** Wednesday, December 4, 2024 12:30:51 AM

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Salutations,

I am writing today to urge that Portland Permitting and Development deny a land use permit currently being sought by Portland General Electric (PGE) for a power line expansion referred to as the "Harborton Reliability Project."

It came to my attention the devastating effects this expansion would have on Portland's Forest Park and the surrounding ecosystems, as the project would require the clearcutting of at least five acres of forest along the powerline corridor.

This area includes habitat crucial for the survival of the Northern Red Legged Frog, which is considered a Sensitive Species in the state of Oregon. The expansion would not only harm native wildlife however; it would be a great loss to those of us Portland residents who enjoy Forest Park's scenic pathways weaving between towering conifers and bordered by moss and ferns.

Additionally, while the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, PGE's data shows that technology industries would benefit the most, while Portland residents would suffer increased electricity costs.

Furthermore, PGE's project proposal fails to comply with the Forest Park Natural Resources Management plan. As of now, the park is home to hundreds of native species of plants and animals. Its conservation is historic, over 160 years in the making.

I strongly oppose the "Harborton Reliability Project" due to its ecological and economic impacts on myself, my fellow Portland residents, and Forest Park as a local treasure which is an unparalleled display of the natural beauty of my home state of Oregon. It was ranked top 10 in the nation!

Thank you,  
Portland Resident

**From:** [Maya Muñoz-Tobón](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** DEFEND FOREST PARK  
**Date:** Wednesday, December 4, 2024 12:31:26 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sent from the road. Pardon the typos.

**From:** [Andy Mummert](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** stop Portland General Electric from clearcutting 20+ acres in Forest Park  
**Date:** Wednesday, December 4, 2024 12:51:09 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Kyla Blomquist](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Defend Forest Park from PGE  
**Date:** Wednesday, December 4, 2024 1:37:04 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. I especially oppose the phase two proposed project which stands to clear cut 15 additional acres of Forest Park.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Forest Park means a lot to the people of Portland and I refuse to see the land lost to support AI expansion for Intel. While we experience climate change and consider that PGE is challenged with finding resiliency during more extreme weather conditions, we must also consider that we cannot afford to lose forest land that protects and stabilizes our environment. We also cannot afford to wait 80 years for this land to hopefully be "restored" post clear cut.

I read PGE's response to Ron Wyden's letter questioning PGE's rate increases, and it's very plain that industrial growth is heavily driving energy demand while residential customers disproportionately bear the brunt of expenses. PGE was asked which sector of its customers have seen the greatest increase in demand, the answer was industrial, which also has the highest power costs, and on average from 2020-2024 has seen an overall decrease in rates. PGE does not answer about this discrepancy surrounding the burden to residential customers vs industrial, and they do not provide a sufficient answer about how and why residential rates can't be kept lower.

Thank you for your consideration.



**From:** [Bailee S](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Date:** Wednesday, December 4, 2024 1:56:34 AM

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Hi Morgan and Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

It may seem like 5 acres isn't a lot, but the fact that it opens the door on an additional 15 being clear cut is very concerning. Land like this is precious and doesn't reappear overnight- clearing it takes things away that may not ever recover. Please do what you can to preserve it.

Thank you for your consideration,  
Bailee Sims

**From:** [Milo Moran](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE Land Grant  
**Date:** Wednesday, December 4, 2024 2:52:00 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Milo Moran  
Portland, OR

**From:** [Siolvan M](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PUBLIC COMMENT on Forest Park  
**Date:** Wednesday, December 4, 2024 3:04:14 AM

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Hi there! I have lived in Oregon most of my life and in Portland for a couple years now.

Since moving to Portland I've come to learn a lot more about sustainable living and the steps we as people can take to divest from climate destruction. The people here taught me so much about consumption, mutual aid and recycling, especially the most multiply marginalized among us. Many Indigenous peoples of the area know how to be proper stewards to the land and are eager to teach us.

Now, is the opportunity for us to listen and be in solidarity not only with Indigenous people, but with this land and ALL OF THE LIFE it supports.

**If approved, this next phase of the project would clear-cut 5 acres of forest habitat** that is critical for red-legged frogs and other protected species. Portland has never stood for climate destruction, and now more than ever with a Trump presidency, it's time to show the country whose side we're on-

The side of the vulnerable.

The side of wildlife, of people, of children, of futures.

Please make the ethical choice.

Thank you.

**From:** [cecil choi](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Wednesday, December 4, 2024 3:14:02 AM

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Dear PP&D:

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Cecil Choi

**From:** [Katsura Balanza](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Protect Forest Park  
**Date:** Wednesday, December 4, 2024 3:30:20 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely, Katsura Kellogg  
Portland Resident  
971.379.7956

**From:** [Elizabeth Gioe](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Date:** Wednesday, December 4, 2024 5:30:40 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

- Elizabeth Gioe

**From:** [Jorie Mitchell](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** What would Jesus do  
**Date:** Wednesday, December 4, 2024 5:39:06 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Amber B.](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Stop this project!  
**Date:** Wednesday, December 4, 2024 6:25:13 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Amber Beaugrand



**From:** [Ebony Heartwood](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Stop Forest Park clear cut  
**Date:** Wednesday, December 4, 2024 6:35:19 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Ebony Heartwood  
Portland resident

**From:** [Dustin Junkert](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Power Line Expansion - Opposition Letter  
**Date:** Wednesday, December 4, 2024 6:37:50 AM

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Dear Morgan and Christine,

As a longtime Portland-area resident, I have been proud to live in a place that values green spaces and beauty, even as cities grow. Forest Park is an incredible feature, and it's very upsetting to hear that PGE is seeking further land use permits in this treasured wild land. I am one of many people who oppose this request and I hope that you'll consider rejecting it to protect our wilderness and beautiful spaces. Please don't let this place to overrun by profit-motivated companies. We've lost so much ground already.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts on Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas very precious to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Kindly,  
Dustin Junkert  
253-250-3355

**From:** [elizabeth.holladay](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Concerned about PGE's Harborton Reliability project  
**Date:** Wednesday, December 4, 2024 6:46:14 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

I have lived in Portland for over 10 years and am just beginning my career as a union carpenter. Through colleagues in the trades, I have heard that Intel is in serious financial trouble and seen the trickle down effect of slow work and layoffs in the field, which makes me wonder how long they will actually survive in the region as a large enough entity to require the power this project aims to deliver.

I personally care about stopping this project because as a former resident of St. John's, I have spent many wonderful days cycling to, in and from the park and consider it a really special place. It has offered me a lot of solace during rocky times in my life, in a way that other parks in the city just can't do.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Thank you for your time.

Liz Jackson  
Beaumont-Wilshire, Portland Resident  
Union Carpenter

**From:** [Kelsey Woodward](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** No to PGE Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 6:59:17 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Cheers,

**Kelsey Jean** (She/her/hers)  
**Cell: (509) 995-2309**  
**Coordinator, Photographer, Sr. Digital & Event Producer**  
[WEBSITE](#) | [LINKEDIN](#) | [IG PORTFOLIO](#)



**From:** [Trevor Newhart](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE Substation  
**Date:** Wednesday, December 4, 2024 7:19:48 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Trevor Newhart, resident of Portland and appreciator of Forest Park.

**From:** [jennifer](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Keep Forest Park Safe. Deny PGE!  
**Date:** Wednesday, December 4, 2024 7:21:13 AM

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Every inch of Forest Park is a treasure to us, to you, to this city and the life in it. Do not, under any circumstances, let any of it be destroyed.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Jennifer Close  
Portland Resident

**From:** [Katrina Gould](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 7:21:40 AM

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Dear Ms. Caruso:

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Katrina I. Gould

--

Katrina I. Gould, LCSW, MSW (she, her)  
Therapist for Individuals and Couples  
825 NE 20th Ave.  
503-702-0877  
[www.katrinagouldlcsw.com](http://www.katrinagouldlcsw.com)  
(pronouns: she/her)

**“It is joy to be hidden and disaster not to be found.” - D.W. Winnicott**

*I am sometimes unable to get to my email on Saturdays and Sundays. If your message is urgent, the best way to get it to me quickly is to leave a telephone message. Thanks.*

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**From:** [Fernanda Navilli](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** PGE Project  
**Date:** Wednesday, December 4, 2024 7:23:49 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Fernanda Navilli

**From:** [Garth Upshaw](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE clearcut  
**Date:** Wednesday, December 4, 2024 7:34:15 AM

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Please, please, please, do not allow PGE to clearcut 5 acres in Forest Park. That park is a treasure, and is one of the reasons Portland is such a great city.

PGE does not act in good faith, and I am concerned this would set a bad precedent.

Thank you.  
Garth Upshaw  
2333 SE Taylor St  
Portland OR 97214

**From:** [amy](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Against Harborton expansion project.  
**Date:** Wednesday, December 4, 2024 7:36:05 AM

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\*\*\*\*\*

If they win the project, please mandate they plant at least 100 acres of trees. Save the frogs!

\*\*\*\*\*

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

\*\*\*\*\*

If they win the project, please mandate they plant at least 100 acres of trees. Save the frogs!

\*\*\*\*\*

Thank you.

Amy Lynn Caplan  
255 SW Harrison St. #23G  
Portland, OR. 9721

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If you call me and reach voicemail, leave your name and number SLOWLY and CLEARLY  
\*\*TWO TIMES.\*\*

Also please excuse typos.

Likely voice texting on a less-than-perfect phone.

**From:** [Jaime Lockard](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** No to pge's proposed development in forest park  
**Date:** Wednesday, December 4, 2024 7:50:18 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Jaime Lockard  
Portland resident

**From:** [Rachel Johnson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition to PGE's power line expansion  
**Date:** Wednesday, December 4, 2024 7:58:34 AM

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Dear Morgan and Christine,

Forest Park is a sanctuary for so many, humans, animals, and flora. It holds tremendous value to me, too, as a place to trail run on the 32 miles of beautiful, gentle curved trail. It helps my mental health and physical well-being. Protecting this land is so important as capitalist endeavors are ever overreaching. Forest Park is an invaluable, free space for Portlanders and visitors to celebrate and learn about nature and develop a sense of conservation concern. In addition to its inherent value, it also creates the opportunity for those who do not have the financial resources or vehicles to go out of Portland to feel the experience of peace being out of the city.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts on Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas very precious to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you,

Rachel Johnson

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Rachel Johnson  
[r.johnson0828@gmail.com](mailto:r.johnson0828@gmail.com)  
she/her/hers

**From:** [Molly O'Reilly](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Save forest park!  
**Date:** Wednesday, December 4, 2024 8:00:33 AM

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Save forest park!

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technolog

**From:** [frankie soto](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Public Comment- Forest Park  
**Date:** Wednesday, December 4, 2024 8:03:15 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Frankie Soto, Tigard, 97224



**From:** [Sarah Farahat](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny Land Permit Use for PGE!  
**Date:** Wednesday, December 4, 2024 8:06:36 AM

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Dear Morgan and Christine,

I'm a Northeast Portland resident for over 20 years.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. Intel has had a major role in the oppression of my friend's families in Palestine and in other regions. I am also concerned about increasing risk of wildfires in our urban areas by adding powerlines.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

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Best,  
Sarah Farahat

**From:** [Jakob Parsons](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment regarding PGE Forest Park Development  
**Date:** Wednesday, December 4, 2024 8:10:02 AM

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Hello,

My name is Jakob Parsons. I am a Portland resident who loves Forest Park and the general abundance of trees in the area.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration. Hope you are well.  
Jakob Parsons



**From:** [Caito Foster](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Save forest park and the animals!  
**Date:** Wednesday, December 4, 2024 8:10:41 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely concerned resident  
Caito Foster  
(720 620 4732

**From:** [Mary Hill](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition to the PGE Harborton Reliability project plan involving Forest Park  
**Date:** Wednesday, December 4, 2024 8:14:46 AM

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Hi there. I've lived in the City of Portland since 1985.

Forest Park is overseen by the City of Portland, with the help of the Forest Park Conservancy. Below is from their opinion regarding cutting almost 5 acres of trees for power lines.

This makes no sense to me, and seems to violate the very reason Forest Park was created.

Thank you for taking the time to read my "no vote", for PGE to clear cut almost 5 acres of land in Forest Park.

There are two alternatives to building new transmission lines that do not involve Forest Park.

There is no evidence that these alternatives have been fully vetted based on the information provided by PGE.

**PGE now claims that time is the critical issue that limits alternatives, yet they have had these alternatives in hand since October 2022.**

If these alternatives are not fully explored and Phase 3 is permitted, Phase 5 will likely be framed as the only practicable solution for transmission line expansion in this area from a time and cost perspective.

Despite multiple requests from the public, PGE has not responded to the request that PGE explore an agreement with Bonneville Power Administration (BPA) to leverage the existing BPA power infrastructure located on an easement adjacent to the area PGE has targeted to clear-cut.

Thanks!

Mary Hill 3411 SW Luradel St, Portland, OR 97219

**From:** [Christina Maul](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park Public Comment  
**Date:** Wednesday, December 4, 2024 8:20:52 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. My family and I hike the beautiful trails of Forest Park every New Year’s Day and throughout the year. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Christina Maul

**From:** [yvanna.m.ramos@gmail.com](mailto:yvanna.m.ramos@gmail.com)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE + Forest Park deforestation  
**Date:** Wednesday, December 4, 2024 8:23:42 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Yvanna



**From:** [emjagger11@gmail.com](mailto:emjagger11@gmail.com)  
**To:** [Caruso, Christine](#)  
**Subject:** Please don't cut down 5 acres of Forest Park  
**Date:** Wednesday, December 4, 2024 8:26:19 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

Forest Park has been a staple of my life in Portland for years. I grew up in Scappoose, a small town just outside of Portland, and when my friends and I got our licenses, one of the first things we did is drive to Forest Park and explore. As an adult, I've been fortunate to hike through there and use it as an in-between meetup spot with various friends who live in St Johns or Northwest Portland. The park has provided a safe place to build community and connect with nature in the city. Losing 5 acres of it would steal the peace and comfort, not to mention these memories, that I experience when walking through it.

Since 2018, I've been watching summer after summer wreak havoc on the natural lands and forests of my state. There are so many places that already will never be the same because of the forest fires that have become a normal occurrence in the Gorge and other natural areas. You have the opportunity to protect this place for generations of Oregonians, and for yourself. Let it be a place that is still recognizable to its former self.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Emma Agger  
Now a Portland, OR resident

**From:** [Michael Farley](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Save Forest Park / Stop Intel  
**Date:** Wednesday, December 4, 2024 8:38:27 AM

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Hi, I am Mike Farley and I live in NE Portland. I have been going to and enjoying Forest Park for 7 years and I countless others do to. Please help preserve this Park for the Portland people, endangered frogs and old trees. Wanted to keep our wild spaces and Forest Park is a treasure. We love Forest Park please help save it for us and future generations. By going so, we will be on the side of history. Thank you for saving Forest Park.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration

**From:** [May Brady](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** FOREST PARK  
**Date:** Wednesday, December 4, 2024 8:42:56 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

- Meghan Brady, forestry service technician for ecosystem restoration and lifetime Portland resident of over 25 years.

**From:** [Anna Jensen](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** NW Residents against clear cutting Forest Park  
**Date:** Wednesday, December 4, 2024 8:56:31 AM

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As a resident of NW Portland (Sauvie Island) and frequent visitor to the incredible wild spaces we have nearby in Forest Park, I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. Look at the leaps and bounds made by the Klamath Dam removal. This is the direction we need to be going in in the state of Oregon. I'm firmly against kowtowing to a known irresponsible actor like PGE, who already price-gouges customers to fill their shareholders coffers and clearly disregards what's best for our communities and natural spaces as Oregonians.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Urging you to please do the right thing.

Anna Jensen

**From:** [Kemmy Rai](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Defend the Forest Park  
**Date:** Wednesday, December 4, 2024 8:59:36 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Kemmy,  
who cares about the trees, animals and the people

**From:** [Breanna Autry](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Preserving Forest Park  
**Date:** Wednesday, December 4, 2024 9:02:08 AM

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Dear whomever it may concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Breanna Autry  
Portland Resident

**From:** [Riley Lozano](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Power line expansion  
**Date:** Wednesday, December 4, 2024 9:12:31 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

Forest Park is a cornerstone of the Portland Metro Area and should be handled with great care. North Plains and Hillsboro residents are already pushing back against the unnecessary tech growth.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

- Riley Lozano  
A PDX metro resident for 14 years  
A PSU Alum

**From:** [Eli Staats](#)  
**To:** [Caruso, Christine](#)  
**Subject:** DEFEND FOREST PARK  
**Date:** Wednesday, December 4, 2024 9:14:03 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Eli Staats  
SE PDX

Sent from my iPhone



**From:** [Bree Reetz](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please do not permit land use for the "Harborton Reliability Project"  
**Date:** Wednesday, December 4, 2024 9:17:18 AM

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Hello,

**I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.**

As a home owner and proud resident of Portland, I am deeply concerned that the Harborton Reliability Project would cause significant and negative impacts to Forest Park and the surrounding ecosystem.

Forest Park is not only a beautiful and almost magical place, but its management goals reflect the aspirational values of myself, our city, and our young people. Forest park is a sacred haven to myself and so many Portland residents. My understanding is that this project would require the clearcutting of at least five acres of forest along the powerline corridor. The idea of clearcutting any portion of it simply breaks my heart.

This plan threatens to undermine our values as it poses potential harm to bird and other wildlife populations, including clearcutting that intersects with crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Again, this doesn't reflect the values of myself or my Portland neighbors.

It's also deeply disappointing because it's clear that while the utility claims that the project is needed for growing electricity demand due to climate smart electrification, the vast majority of increased demand is coming from tech facilities - not from a true need for our residents.

I am **strongly opposed** to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan.

**Please refuse PGE's land use permit.**

Thank you for listening to my voice.

- Bree Reetz

Portland homeowner  
Proud Portland resident, and neighbor  
Finding solace in the woods of our Forest Park

**From:** [Oliver Whitney](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please refuse PGE's land use permit to clearcut Forest Park  
**Date:** Wednesday, December 4, 2024 9:20:53 AM

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Hi Morgan and Christine,

As a Portland resident, Forest Park is one of the most important parts of the city for me. It's actually a major reason I moved here, with its beautiful ecosystem being one of the first things I experienced the first time I visited the city. I moved here a month later, and I frequently hike through Forest Park and marvel at it every time. If PGE clearcuts part of the forest for the "Harborton Reliability Project" it wouldn't only deeply pain me and many other residents — it would severely harm the ecosystem and wildlife.

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Best,  
Oliver Whitney

**From:** [Adam Lifscics](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park!  
**Date:** Wednesday, December 4, 2024 9:32:54 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Adam Lifscics

**From:** [paty El](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Wednesday, December 4, 2024 9:37:39 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Paty Elguera

**From:** [Daniela Santos](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment - Deny PGE Land Use Permit  
**Date:** Wednesday, December 4, 2024 9:45:35 AM

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To whom it may concern:

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best regards,  
Daniela

**From:** [Chloe Levin](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please stop the Harborton Reliability Project!  
**Date:** Wednesday, December 4, 2024 9:45:56 AM

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Hello,

I am writing to urge you to not allow PGE to clearcut 5 acres in forest park for the Harborton Reliability Project! We need to protect the trees and species that live there, not make way for electricity projects that will mostly benefit big corporations. I was born in Portland and grew up here going to Forest Park. It is the best aspect of the city and so important for our community and environment. Do not allow PGE to destroy nature!

Sincerely,  
Chloe Levin

**From:** [Lainnie Alexander](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment for The Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 9:47:10 AM

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To Christine and Morgan, and anyone else monitoring their inboxes,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. The Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. For a city that values its nature, I find this project unconscionable.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Like most people in Portland, I have spent much time in Forest Park. Hiking alone or with others, taking a rest at many of the placards, reading about the nature and history around us. There is only so much old growth forest left, and part of Forest Park's magic is that it's home to so many creatures that cannot survive elsewhere.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Lainnie Alexander

**From:** [Reed Batson](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park PGE public comment  
**Date:** Wednesday, December 4, 2024 9:48:20 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.



**From:** [Krista Barnish](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Save Forest Park!  
**Date:** Wednesday, December 4, 2024 9:49:53 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

- Krista Barnish

**From:** [Luke Gutsell](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park preservation  
**Date:** Wednesday, December 4, 2024 9:51:26 AM

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**Dear Christine,**

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely yours,

Luke Gutsell

Licensed Massage Therapist #22316  
[bodyworkbyluke.org](http://bodyworkbyluke.org)

**From:** [Sam Bovarnick](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Date:** Wednesday, December 4, 2024 9:52:32 AM

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Good Morning

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. I, and other concerned citizens, have serious concerns that initial clearcutting would open the door to additional clearcutting. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

As a born-and-raised Portlander, Forest Park holds a special place in my heart. Some of my earliest exposures to the outdoors and natural world happened in Forest Park. It is a singular place that helps define what Portland is. Please do not allow this PGE project to diminish one of our city's most valuable resources for the sole benefit of large tech corporations located outside of Portland.

Best,  
Sam Bovarnick

**From:** [emilio ramirez](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please deny PGE's Harborton Reliability Project request  
**Date:** Wednesday, December 4, 2024 10:04:35 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

I am a Portland resident in part because Forest Park exists. Not only does it provide a singularly beautiful place to walk, but it is also a rare urban habitat that shelters a diverse community of plants, insects, birds, including the imperiled Northern Red Legged Frog.

Removing five acres or more of forest land along the powerline corridor to temporarily satiate tech companies' growing electricity needs is a terrible idea. It will diminish habitat for this precious ecosystem and thereby diminish the quality of human lives. The negative impacts of this proposal are also directly in conflict with the Forest Park Natural Resource Management Plan.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents and because it fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit. Thank you for your consideration.

[Emilio Ramirez](#)  
NE Portland

**From:** [Helen Nesburg](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment on PGE Proposal  
**Date:** Wednesday, December 4, 2024 10:06:35 AM

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Good Morning Morgan & Christine,

I am writing to ask you to reject PGE's proposal to clear cut 20 acres in Forest Park. Our forests and wild spaces are what make Portland such an amazing city. Our natural resources belong to the people, it's what brings business and tourists to invest in our community. Clear cutting this land in service to large tech industry would be a short sighted method with long term consequences to the biodiversity and livability of this region.

Please deny PGE's permit application for this project and protect the park.

Thank you,

Helen

**From:** [Erik Brennan](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park!!!  
**Date:** Wednesday, December 4, 2024 10:08:24 AM

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Please actually read this! Think long term! We have a new incoming federal administration that will fit protections of natural spaces! Don't do this to portland!

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Very Concerned Citizen and Voter,

Erik Brennan

**From:** [Luken Upshaw](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park Clearcut  
**Date:** Wednesday, December 4, 2024 10:09:12 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern RedLegged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Elizabeth Reynaud](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** DENY Forest Park Deforestation  
**Date:** Wednesday, December 4, 2024 10:11:28 AM

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Hello,

I'm writing to urge Portland Permitting and Development to DENY the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" power line expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the power line corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration.

Elizabeth Reynaud



**From:** [Naomi McCoy](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment - Forest Park  
**Date:** Wednesday, December 4, 2024 10:13:13 AM

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Hello,

I am a Portland resident writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

with gratitude,  
Naomi McCoy

**From:** [María Lara](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project"  
**Date:** Wednesday, December 4, 2024 10:14:47 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

My best,

Maria Lara

**From:** [Chad Williams](#)  
**To:** [Caruso, Christine](#)  
**Subject:** DO NOT LET PGE CLEAR CUT FOREST PARK  
**Date:** Wednesday, December 4, 2024 10:14:58 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

—Chad Williams Portland Resident and IBEW Local 48 Electrician  
Sent from my iPhone

**From:** [M.C. Perna](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** DENY Land use permit to PGE in Forest Park  
**Date:** Wednesday, December 4, 2024 10:15:50 AM

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Hi Morgan and Christine,

I'm writing to urge that Portland Permitting and Development deny the land use permit being sought by Portland General Electric for the "Harborton Reliability Project" power line extension.

This project will irreparably damage Forest Park, one of the greatest natural treasures in the city of Portland. This would ruin its beauty and it would be detrimental to the wildlife that call Forest Park home.

As this project will pretty much only benefit Intel and provide no net positive to Portland or its residents there is little reason for the city to allow the project. At a time when big tech companies are using massive amounts of electricity we should not be encouraging them to do additional environmental damage. This is a major global warming related issue. Tech companies should be innovating their way out of their problem, not looking to Portland for a hand out.

Please deny this permit!

Thank you,  
Matthew Perna, Portland resident District 2

**From:** [Brian Ó hAirt](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Urgent appeal to deny the land use permit for PGE's Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 10:27:32 AM

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Hello Morgan and Christine,

My name is Brian. I am a community organizer as well as educator at Portland Community College. I am highly invested in the Portland-area's environmental wellbeing. For this reason, I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by PGE for the Harborton Reliability Project powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. This clearly does not comply with the Forest Park Natural Resources Management Plan!

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. It also paves the way for clearcutting of an additional 15 acres in the future. This is unconscionable and unacceptable as there are other alternative sites available for this project. I urge you to convey this information to PGE and send them back to drafting a new project proposal!

Additionally, it is clear that PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. The data don't lie and PGE should be ashamed that they're expecting tax payers to accept this nonsense--especially after such high rate hikes we've experienced recently!

I am strongly opposed to this project. Please refuse PGE's land use permit. Thank you for your consideration.

le meas agus gach dea-ghuí,

Brian Ó hAirt (he/they)  
Portland, Oregon  
(503) 387-1857  
[www.brianohairt.com](http://www.brianohairt.com)

*Portland, Oregon is on unceded tribal land, on the traditional village sites of the Molalla, Cowlitz, Tualatin, Kalapuya, Kathlamet, Multnomah, Wasco, Clackamas, and other Bands of Chinook. I seek to live in proper relationship with this land and its indigenous communities by honoring their right to self-governance and by standing in solidarity with their causes to reclaim what has been denied them under settler colonialism.*

**From:** [Christopher Foley](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 10:28:41 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Claire Frazier](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment about PGE's proposed land use permit  
**Date:** Wednesday, December 4, 2024 10:32:53 AM

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Hello,

I am writing to urge Portland Permitting and Development to DENY the land use permit currently being sought by PGE for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the HRP would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming important bird, frog and other wildlife populations and impacting recreational areas popular to Portland residents. The proposed project would require the clearcutting of at least 5 acres of forest along the powerline corridor, including an area that provides crucial habitat for the endangered native Northern Red Legged Frog. These impacts are in direct conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility company claims that the project is needed for growing electricity demands due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from the aforementioned tech facilities.

I am STRONGLY opposed to this project due to its ecological and economic impacts on myself, other Portland residents and the wildlife that rely on the remaining habitat in its entirety. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. And they keep being sneaky about adding more and more acreage to their proposal which is unethical and super messed up.

Please REFUSE PGE's land use permit.

Thank you for your consideration.

-Claire Frazier  
Multnomah County resident since 1988

**From:** [Ema Hadziselimovic](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Re: public comment regarding PGE / Forest Park  
**Date:** Wednesday, December 4, 2024 10:35:54 AM

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To Whom it May Concern:

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the Harborton Reliability Project powerline expansion.

Forest Park is one of the few green spaces in the city that is a true nature reserve and where we can go be in nature and support the natural ecosystem.

The Harborton Reliability Project would devastate this precious resource. It would require the clearcutting of at least five acres of forest along the powerline corridor, endangering animals who depend on this habitat.

These actions directly conflict with the Forest Park Natural Resource Management Plan, undermining its goals and harming the wildlife populations that depend on this ecosystem.

I strongly oppose this project for its ecological, economic, and personal impacts. Forest Park is more than just a green space—it's a lifeline for Portland's people and wildlife, and it must be protected.

Please deny PGE's land use permit and preserve this irreplaceable piece of Portland's identity.

Thank you for your consideration.

Ema Hadziselimovic  
3609907517



**From:** [Eleni Eisenhart](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Harborton Reliability Project Land Use Permit Public Comment  
**Date:** Wednesday, December 4, 2024 10:40:39 AM

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To whom it may concern:

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,

Eleni Eisenhart, Portland Resident

**From:** [Emily Hawkins](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny land use permit to PGE!  
**Date:** Wednesday, December 4, 2024 10:47:38 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

***Emily A. Hawkins***

**From:** [Angela Thornton](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Do not clear cut forest park!!!  
**Date:** Wednesday, December 4, 2024 10:54:31 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands. The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Lucas Mirabito](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Strongly oppose Harborton reliability project  
**Date:** Wednesday, December 4, 2024 10:55:38 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Lucas Mirabito, Ph.D.

He/him/his

NW Portland resident and frequent enjoyer of forest park

**From:** [Raphael Leonard](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Stop PGE Forest Park expansion  
**Date:** Wednesday, December 4, 2024 10:56:31 AM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

It also sets a terrible precedent to just keep cutting down the park, a public good, whenever someone asks. Don’t be Portland’s “tragedy of the commons” example.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Raphael Leonard  
808-398-4877

**From:** [Chele Schmidt](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 10:58:00 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you,  
Chele Schmidt

**From:** [Timothy McSpadden](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest park  
**Date:** Wednesday, December 4, 2024 11:02:52 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

I have very little faith that public servants will do the right thing for the people of this city. Please restore my faith that people and their environment matter more than profit.

Regards,  
Tim McSpadden

**From:** [Joshua Salinas](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Cc:** [joshua.r.salinas.civ@army.mil](mailto:joshua.r.salinas.civ@army.mil); [Matthew Elmore](#)  
**Subject:** DEFEND FOREST PARK  
**Date:** Wednesday, December 4, 2024 11:03:57 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration. I have shared this with other agencies that might have special interest in these contracts and what it means for residents of the Portland, OR area.

V/R

Joshua Ryan Salinas  
US Army Reserves  
Human Resource Officer  
99th Readiness Division  
Department of Human Resource  
Reserve Personnel Action Center  
[Joshua.r.salinas.civ@army.mil](mailto:Joshua.r.salinas.civ@army.mil)  
[Joshua.r.salinas@gmail.com](mailto:Joshua.r.salinas@gmail.com)



**From:** [Arthur Marx](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Dec. 4 deadline for Comments of the purposed PGE Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 11:05:29 AM

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I would appreciate a reply to this email that it has been received by the Dec. 4 deadline.

To the Portland Permitting and Development:

I am submitting this response in regards to the request for comment of the proposed PGE Harborton Reliability Project, case file LU 24-041109 CU EN GW where PGE desires to construct a connection to existing PGE lines currently located in a remote corner of Forest Park adjacent to an existing set of high voltage transmissions lines. I support the proposed 1400 foot westward alignment traversing a very small part of Forest Park where a minimal amount of vegetation and habitat will be impacted and where PGE proposes to more than adequately provide extensive mitigation to offset the impact. Further, I strongly oppose any of the alternative alignments that might be located along Highway 30, Marina Way or Riverview Dr. northward towards Sauvie Island Bridge, which would cause harm to similar habitat, vegetation, persons, scenic views per Multnomah County Code and Metro Greenspace Set Aside areas located in these alternate alignments simply to connect to the same transmission lines.

Analyzing the permit application, the PGE detailed plans, the plethora of data PGE has provided and the comprehensive responses PGE has provided to the questions and concerns that the City has posed is the reasoning for my support of the proposed shorter, more direct, less overall impactful 1400 foot alignment.

Conversely I strongly oppose an alignment that would travel northward towards the Sauvie Island Bridge because as determine in numerous reports and investigations the overall negative impacts not only to vegetation and habitat concerns, but impaction to property owners and their rights, scenic views from Sauvie Island, Multnomah channel and hillside observes, and simply causing an over-population of more overhead utilities along the path will deteriorate the aesthetics of the neighborhoods affected.

Once again, taking into account the mitigation planning PGE will implement, their extensive resources and their responsible track record, the benefits of the shorter direct alignment westward makes much more sense and greatly outweighs any concerns that may oppose it.

Sincerely,

Arthur Marx  
14200 NW Riverview Dr.  
Portland Or 97231  
503-793-7661

**From:** [Tesoro](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Defend Forest Park for the People and for the Planet  
**Date:** Wednesday, December 4, 2024 11:08:40 AM

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As a citizen of the Portland~Hillsboro area, it is imperative that Portland Permitting & Development denies approval of the Harborton Reliability Project. We must hold accountable Portland General Electric and Intel to efficiently use and update their pre-existing infrastructure. Do not allow them to keep disrupting (and eventually destroying) our environment that we all share and depend on. Forest Park should be fully protected from exploitation. I urge you to do what is best for the people and for the planet by denying approval for the Harborton Reliability Project. Thank you for your time.

**From:** [Indyanna Clark](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny PGE's Land Use Permit for the Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 11:13:55 AM

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Hello , I hope this email finds you well.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration

Best,  
Indyanna Clark  
435-459-0336  
Portland Resident

**From:** [eskelin beilharz](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please don't destroy our park  
**Date:** Wednesday, December 4, 2024 11:15:56 AM

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To whom it may concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

Forest park, especially the northern section, has been a refuge for me throughout the 7 years I have lived in Portland. And if it were to be clear cut, I personally would find it devastating.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Eskelin Beilharz

**From:** [Yasasvini Duvvuri](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition to removal of 20 acres from forest park  
**Date:** Wednesday, December 4, 2024 11:18:33 AM

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Dear Morgan and Christine,

I am a long time Portland resident. The nature forest park has provided to me has been irreplaceable and I can not even imagine the destruction of that habitat in any way. As a state and city who so heavily stands on our environmental progress, removing any of these old growth trees at all is completely going against that stance.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Yasasvini Duvvuri

**From:** [Lindsey Raleigh](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition to PGE power line expansion  
**Date:** Wednesday, December 4, 2024 11:19:21 AM

---

Hello,

I am writing to urge Portland Permitting and Development to DENY the land use permit currently being sought by PGE for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the HRP would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming important bird, frog and other wildlife populations and impacting recreational areas popular to Portland residents. The proposed project would require the clearcutting of at least 5 acres of forest along the powerline corridor, including an area that provides crucial habitat for the endangered native Northern Red Legged Frog. These impacts are in direct conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility company claims that the project is needed for growing electricity demands due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from the aforementioned tech facilities.

I am STRONGLY opposed to this project due to its ecological and economic impacts on myself, other Portland residents and the wildlife that rely on the remaining habitat in its entirety. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. And they keep being sneaky about adding more and more acreage to their proposal which is unethical and super messed up.

Please REFUSE PGE's land use permit.

Thank you for your consideration.

Lindsey Teasdale  
Portland homeowner

**From:** [Harper Lethin](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Protect forest park!  
**Date:** Wednesday, December 4, 2024 11:24:22 AM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

Forest park is an invaluable part of the Portland community, where human and nonhuman residents can find refuge from the city. To approve this project is to set a precedent that Forest Park can be whittled away for the needs of corporations, against the wishes of the Portland community. Thank you for your consideration.

Sincerely,  
Harper Lethin, Portland resident (97213)

Harper

**From:** [nicole](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park Permit Public Comment  
**Date:** Wednesday, December 4, 2024 12:01:26 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration,  
Nicole Radlauer



**From:** [Meghan Kearney](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 12:05:11 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Lily Hanson](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Forest park  
**Date:** Wednesday, December 4, 2024 12:07:38 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Rachael Nelson](#)  
**To:** [Caruso, Christine](#)  
**Subject:** saving forest park from pge  
**Date:** Wednesday, December 4, 2024 12:10:37 PM

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Hello there,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Additionally, as a New York City transplant, Forest Park is such a special feature of Portland and one of the main reasons I have made Portland my home. With the recent population decrease, I would think the city of Portland would want to value and treasure and highlight the beautiful nature features that make this city unique, rather than fold to industry.

Thank you,  
Rachael Nelson

Sent from my iPhone

**From:** [Huntress](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Opposition to land use permit by Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 12:11:11 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

~Hunter Keller

**From:** [Ellie Graiziger](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Date:** Wednesday, December 4, 2024 12:12:20 PM

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Good afternoon.

I'm sure that you will be receiving many of the same emails that I pasted below as there is great organizing happening around STOPPING this project. To add my own commentary, we are in late stage capitalism which is causing unstoppable climate disaster. All projects like these need to be stopped for us to have any chance at sustaining human life — how we all aren't in agreement about this is baffling and disturbing. This project's aim is to line the pockets of a few and simultaneously it will destroy ecosystems and contribute to genocide and our own demise. It's unbelievable that we have to organize around protecting our environment and that folks continue to believe the lies of major corporations when they describe their destructive practices and projects as ones that serve the people. That's not how capitalism works. Don't let your legacy be adding another nail to the coffin. Stand up to big industry and stop this project.

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

A forest park lover and informed hater of capitalism and Intel.

Ellie (N Portland resident)

**From:** [Conny Wagner](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment: Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 12:15:08 PM

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Hi,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Conny Wagner  
4005 SE 33rd Ave  
Portland, OR 97202

**From:** [Rue E](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Save Forest Park  
**Date:** Wednesday, December 4, 2024 12:25:44 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Our natural resources should be protected, especially one as special as Forest Park.

Rue

**From:** [Jennifer McGhee](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment about PGE's proposed land use permit  
**Date:** Wednesday, December 4, 2024 12:27:46 PM

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Hello,

I am writing to urge Portland Permitting and Development to DENY the land use permit currently being sought by PGE for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the HRP would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming important bird, frog and other wildlife populations and impacting recreational areas popular to Portland residents. The proposed project would require the clearcutting of at least 5 acres of forest along the powerline corridor, including an area that provides crucial habitat for the endangered native Northern Red Legged Frog. These impacts are in direct conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility company claims that the project is needed for growing electricity demands due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from the aforementioned tech facilities.

I am STRONGLY opposed to this project due to its ecological and economic impacts on myself, other Portland residents and the wildlife that rely on the remaining habitat in its entirety. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. And they keep being sneaky about adding more and more acreage to their proposal which is unethical and super messed up.

Please REFUSE PGE's land use permit.

Thank you for your consideration.

-Jennifer

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Jennifer McGhee  
Metology  
503.989.5068  
[jennifer@metology.net](mailto:jennifer@metology.net)



**From:** [Mudita Lionheart](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please take this very very very seriously!!!  
**Date:** Wednesday, December 4, 2024 12:50:27 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Luz Liliana Devalier y Vazquez](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny PGE's land use permit!  
**Date:** Wednesday, December 4, 2024 12:54:28 PM

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To whom it may concern,

My name is Luz Liliana Devalier y Vazquez, and I am an indigenous resident of Portland.

I am writing to urge Portland Permitting and Development to deny the land use permit currently requested by Portland General Electric (PGE) for the Harborton Reliability Project powerline expansion. As the City has previously acknowledged, this project would have severe consequences for Forest Park and its surrounding ecosystem, disrupting the park's management goals, endangering bird and wildlife populations, and diminishing recreational areas cherished by Portland residents.

The project would necessitate the clearcutting of at least five acres of forest along the powerline corridor, including areas that serve as critical habitat for the at-risk Northern Red-Legged Frog. These impacts directly contradict the Forest Park Natural Resource Management Plan.

Furthermore, PGE's proposed powerline expansion will not serve the needs of Portland residents, but rather support energy infrastructure for the rapidly growing technology sector in Hillsboro, including projects like the Intel expansion. While PGE claims the project is necessary to meet the rising electricity demand driven by climate-smart electrification, a review of PGE's data reveals that the majority of this increased demand is coming from tech facilities.

I strongly oppose this project due to its ecological and economic consequences for both myself and other Portland residents. Additionally, PGE's proposal fails to comply with the Forest Park Natural Resource Management Plan. I respectfully ask that you deny PGE's land use permit. Thank you for your attention to this matter.

**From:** [Ben Meyer-Crosby](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** PGE Forest Park Public Comment  
**Date:** Wednesday, December 4, 2024 1:00:44 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Ben Meyer-Crosby  
District 2 Resident  
Portland, OR

**From:** [Christopher Boone](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 1:03:34 PM

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Dear Morgan and Chris,

My name is Chris Boone, I'm a resident of NE Portland (4541 NE 22nd). I'm writing to please encourage you to deny PGE's Harborton Reliability Project plan in Forest Park.

Of course it's reasonable for PGE to upgrade and shore up their infrastructure to ensure reliable electrical service for our neighbors in Beaverton and Hillsboro, but as they have already admitted there are other possible routes they can take to enable that same service, and it seems unreasonable to allow them to clear cut ~5 acres of pristine forest, with a further ~15 acres to come. If phase 3 goes on as planned, PGE will have a stronger position to push for further deforestation in phases 4 & 5 of their planned upgrades.

As the gatekeepers of approval, please do everything you can to ensure we can keep our ancient forest as healthy and as whole as possible, in line with the Forest Park NRMP, whose first conservation goal is to "Protect Forest Park's native plant and animal communities, and its soil and water resources while managing the forest ecosystem in order to grow a self-sustaining ancient forest for the enjoyment and benefit of future generations."

The Red-legged frog is important and deserves to be protected, but just as important is the maintenance and upkeep of the crown jewel of Multnomah county. The current easement through the park is disruptive enough, and we should be particularly stringent in keeping corporations accountable when it comes to adulterating our public resources.

I'll stop myself from writing a novella, and instead say that I appreciate everything you do for the city, and I hope we can count on you to stand up to big business interests against the destruction of even one further inch of Forest Park.

Thank you for your time and attention,  
Chris

**From:** [Mia O'Connor-Smith](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park is so important, please protect it  
**Date:** Wednesday, December 4, 2024 1:07:14 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Mia O’Connor

“To watch us dance is to hear our heart speak.”

**From:** [Allison](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Public Comment Regarding Forest Park  
**Date:** Wednesday, December 4, 2024 1:07:38 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Allison Benz  
She/her

**From:** [Shannon Newsum](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 1:13:45 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Cole Hammerquist](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition to PGE lines IN Forest Park  
**Date:** Wednesday, December 4, 2024 1:20:50 PM

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Dear City Planners,

I am opposed putting new lines INSIDE Forest Park and to this proposed location, but in favor of the line itself. It is my understanding that there are options that do not go through Forest Park. The size and wildness of our urban forest is important to us all. Please put in the extra work to protect this distinguishing feature of our beautiful city.

If approved, this next phase of the project would clear-cut 5 acres of forest habitat that is critical for red-legged frogs and other protected species, while paving the way for PGE to continue clear-cutting over 15 additional acres.

Please work with private property owners instead of treading on our forest.

Thank you,  
Nicole Robinson, Portland resident



**From:** [Kristin W](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment to Deny PGE's land use permit for project  
**Date:** Wednesday, December 4, 2024 1:22:41 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. This would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you,

Kristin Wray

**From:** [Jewel](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Preserving forest park!  
**Date:** Wednesday, December 4, 2024 1:24:40 PM

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Hey there Morgan and Christine!

I know you've heard from may on this! But if you have any power here, please act to preserve forest park from ANY deforestation or cutting of trees!

"Clearcutting anything in Forest Park for any reason is unconscionable to me. Forest park is one of the most precious resources of any city in this country, and we need it preserved for the sake of all the animals and plants that live there. We also need it to be preserved for the mental health and wellbeing of Portlanders and people who come to visit the city. Portland has become over congested, and the need for nature within city limits is stronger than it's ever been.

Clearcutting is 100% not what Portland stands for. The development of our city has gone too far, and I stand with all Portlanders who oppose this measure."

This park is so important to our city's well-being! Thank you so much for caring about what's good and worth protecting in this messed-up world!

Sincerely,

Jewel Thieszen

Sent from my iPhone

**From:** [Christopher Hamilton](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment Opposing PGE project in Forest Park  
**Date:** Wednesday, December 4, 2024 1:28:56 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Eternal Honeymoon](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Please! Public Comment  
**Date:** Wednesday, December 4, 2024 1:29:38 PM

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To Whom it May Concern:

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Warm Regards,

Jordan Horowitz

**From:** [Zack Wolk](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Stop clear cutting Portland's forests!  
**Date:** Wednesday, December 4, 2024 1:30:40 PM

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Hello, I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Praise God

**From:** [Bridget Onaolapo](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Right side of History  
**Date:** Wednesday, December 4, 2024 1:30:47 PM

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Hello,

I just heard there are plans to clear cut 20 acres of Forest Park. This is most definitely not the right time in history to allow this to happen. Please think of the future and how badly we need this to remain. You will change Portland & the planet significantly.

We count on our political leaders to guide us. Guide us well.

**From:** [Marilyn Herrera](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park public comment  
**Date:** Wednesday, December 4, 2024 1:39:17 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

Forest Park is one of Portland’s greatest assets. As an avid nature lover and dog mom, Forest Park has been a source of reprieve and relaxation.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Marilyn Herrera

**From:** [Rebekah Odgear](#)  
**Subject:** Forest Park  
**Date:** Wednesday, December 4, 2024 1:39:18 PM

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Hello,

I am a Portland resident who loves enjoying Forest park with my family. We spend so much time hiking through this beautiful park and it's a reprieve from city living in our backyard.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Bekah



**From:** [roswell haynes](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** PGE Forest Park Project Public Comment  
**Date:** Wednesday, December 4, 2024 1:42:03 PM

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To whom it may concern,

Hello. I'm a born and raised Oregonian and long-time Portland resident, and I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, significantly harming other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. One of the things that makes Portland beautiful and unique is how green it is, how many trees there are.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. The climate is in crisis, we don't need more clearcutting.

Thank you for your consideration

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:34:44 AM

---

**Christine Caruso** (she/her)  
Senior Planner, MArch  
Title 33 - Land Use Services Division

Portland Permitting & Development - City of Portland  
503-865-6420 (cell)

[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)

Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

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**From:** Alanna Pass <azpass.1@gmail.com>  
**Sent:** Monday, December 2, 2024 3:58 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

- Please reconsider your expansion into Forest Park  
PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. Removing 150 year old maturing trees, and replacing them with oak saplings does not come close to replacing the unique impacted habitat.

Sincerely  
Alanna Pass

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:35:15 AM

---

**Christine Caruso** (she/her)  
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Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

---

**From:** lrusch@usa.net <lrusch@usa.net>  
**Sent:** Monday, December 2, 2024 4:03 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

I would like to contribute to the public comments for LU 24-041109 CU EN GW, the PGE plan that include clear cutting in Forest Park. First I have to say clearly, Hands off Forest Park!!! It is a resource for the people and animals and plants of Portland area and should not be used for ANY OTHER PURPOSE. I understand that other options are available, so clear cutting in Forest Park should be off the table completely.

Me, my family and my neighbors and friends all use Forest Park for our mental and physical health. I walk and run on trail throughout the park on 3-6 day a week as do many people I know. Important and beloved species depend on it as well. We have seen fox, deer, owls, herons and other wildlife in the park and they need large continuous swaths of land to thrive. Old trees, 100 years and older, are an important natural resource and help protect our land against destructive fires. Electrical lines of any kind can trigger wildfires in the precious land. Once a land is clear cut it is irrevocably destroyed. Forest Park cools our neighborhood in the summer and provides shade and fresh air all year long.

The 2 main goals of the NRMP are to 1) grow an ancient forest and 2) protect/enhance the forest for education/recreational opportunities. PGEs proposal directly contradicts these essential goals, which I believe in deeply, so the plan MUST BE REJECTED.

1. PGEs proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.
2. PGEs Alternatives Analysis shows there are possible locations outside Forest Park.
3. Approval of this project could set a dangerous precedent

Bottom line: Me, my family and my neighbors and friends all want you to *Reject PGEs proposal!*

Thank you,

Elizabeth Rusch (she/her)  
2757 NW Raleigh Street  
Portland, Oregon 97210  
(503) 896-0953 C  
[www.elizabethrusch.com](http://www.elizabethrusch.com)

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“Action-packed...vivid...inspiring” – *Booklist*, starred review

*People Magazine* Must-Read

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:35:33 AM

---

**Christine Caruso** (she/her)  
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---

**From:** Gena Connelly <geconn@gmail.com>  
**Sent:** Monday, December 2, 2024 4:07 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Dear Mr. Steele:

It's come to my attention that Portland General Electric (PGE) has recently submitted a multi-part proposal that directly impacts Forest Park and the natural resources that it contains. I am writing to express my concerns and dismay and urge you to reject PGE's proposal.

My husband and I spend an inordinate amount of time in both Washington and Forest Parks on a weekly basis. We hike, picnic, and take in the natural environment, one of the jewels that these parks provide to all residents of the City of Portland and the surrounding metropolitan area. While Portland itself is a small city, it IS a city nonetheless and Forest Park provides a critical escape for city dwellers to reconnect with the natural world and the untampered with environment. Without these places, Portland would be like any other small city in the country; a metropolitan, unremarkable, urban landscape, indistinguishable from any other city. Portland is notable in that it values open and green spaces. The Forest Park environment is unique in that it contains old, if not ancient, trees and understory.

When the Forest Park Natural Resources Management Plan (NRMP) was created, it established a **LEGAL** protection for the park and how it is to be managed going forward. The PGE proposal flies directly in the face of this plan in that it neither protects the old growth forest nor does it enhance the

forest for educational or recreational use. At present time, as one example, the Northern Spotted Owl is at a critical juncture in terms of species survival. The owl **depends** on the old growth forest environment. Invasive Barred Owls have already infiltrated the forest habitat and are slated for extermination in coming months and years. The **ONLY** way the spotted owl will survive is if there is habitat accessible to it. Removing even the small acreage that PGE proposes will have a direct and deleterious impact on the species survival going forward. Five acres or less may seem like nothing but to a small bird population, it's the difference between life and death.

While PGE has proposed mitigation efforts, these will be too small and too late to accomplish the necessary goals. In addition, PGE has provided alternative analysis that demonstrates that there are other locations outside of the Forest Park environs. With this in mind, why is the use of the park even in consideration, especially since it directly violates the legal and stated purpose of the park as it stands? Beyond this, approval of this precedent makes it entirely too convenient to ignore rulings in favor of future use of the park for other than stated goals.

Running electrical power lines through the park is a disaster waiting to happen. How, for example, will PGE manage the ongoing effects of climate change and the increasing risk of wildfire in the event of an electrical failure? Has the City even begun to consider how it will manage wildfire issues going forward in the event that the PGE proposal is granted? How does removing old growth, trees that are over 150 years old, and replacing them with immature oak saplings continue to foster a forest management policy that prioritizes mature trees? And how does removing trees of this age, trees that are directly responsible for carbon capture, and replacing them with much smaller trees benefit our environment on the whole? Disruption of two streams and permanently filling in two wetlands does less than nothing to protect a fragile ecosystem. The oak saplings that the proposal offers as a mitigation plan creates a monoculture which is not in the forests' best interest. Further, for those oak saplings to have ANY positive impact in or on their environs will take decades while the existing forest is already doing its job. And, by the way, who pays for this? PGE? The taxpayers? If it's PGE, they'll pass the costs on to their customers. I for one am not interested in subsidizing their plan.

This proposal is misguided and is in violation of the very plans that the City established to protect Forest Park. PGE is NOT acting in good faith, especially considering that they failed to release the Toth report demonstrating viable alternatives until October 2024.

I strongly urge you to reject the PGE proposal and make every effort to hold the NRMP as the gold standard for forest management.

Sincerely,  
Gena and John Connelly

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:35:50 AM

---

**Christine Caruso** (she/her)  
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503-865-6420 (cell)

[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)

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---

**From:** Roberta Jortner <[robertajortner@gmail.com](mailto:robertajortner@gmail.com)>  
**Sent:** Monday, December 2, 2024 4:12 PM  
**To:** Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)>  
**Cc:** Roberta Jortner <[robertajortner@gmail.com](mailto:robertajortner@gmail.com)>  
**Subject:** Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

I am writing to urge the city to reject PGE's proposed Harborton Reliability Project (LU 24-041109 CU EN GW).

There are many reasons to do so, including:

1. PGE's proposal conflicts with the Forest Park Natural Resources Management goals and priorities, especially the stated priority to manage Forest Park toward old growth. The proposal would eliminate 15 maturing conifers, replacing them with saplings. It will take many decades to compensate for the ecosystem services lost.
2. PGE's own alternatives analysis indicates there are alternative locations for this project that should be further studied. The availability of potentially viable alternatives should be sufficient grounds based on Title 33 requirements to deny this land use review, especially given the anticipated impact of the proposed project.
3. Last but not least, approval of this project would set a damaging precedent not only for future land use decisions in Forest Park but in other sensitive habitats throughout the city.

Forest Park is a uniquely valuable ecological resource due to its size and connectivity – the largest urban forested park in the nation. Birds and other wildlife populations are declining in our region and globally. Their challenges are increasing due to climate change. They need connected habitat patches and corridors that allow them to move across the landscape, as well to higher and lower elevations. The location of this project is home to many species, including the red-legged frog which is identified as a sensitive species in Oregon. Community members put much effort each year to help the red-legged frog cross Highway 30 safely. This project would create habitat fragmentation in a remote area of the forest that also contains two streams.



I and other Portlanders have long-term deep connections with Forest Park and are counting on the city to adhere to its policies by rejecting this proposed project.

Sincerely,

Roberta Jortner, Portland resident

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:36:06 AM

---

**Christine Caruso** (she/her)  
Senior Planner, MArch  
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503-865-6420 (cell)

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Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

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**From:** DJ <djlikesbirds@protonmail.com>  
**Sent:** Monday, December 2, 2024 4:27 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

When I first moved to Portland, the first thing that struck me was how intertwined the city and nature are. I could be downtown, surrounded by skyscrapers, and then drive 5 minutes and be in old-growth forest. Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not

align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,  
DJ Schaller

Sent from [Proton Mail](#) for iOS

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:37:02 AM

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**Christine Caruso** (she/her)  
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**From:** hazypictures@protonmail.com <hazypictures@protonmail.com>  
**Sent:** Monday, December 2, 2024 4:38 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Hi I am writing asking you to reject PGE's proposal to log in Forest Park.

I am a regular user of Forest Park and love that we have this kind of recreation space in the city and it's important that we continue to preserve this unique urban green space for both our enjoyment and for the home it provides for so many plants and animals.

1. PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. We also know that this area of Forest Park provides critical habitat for endangered or species of concern. This could have a devastating impact on them.
2. PGE's Alternatives Analysis shows there are several possible locations outside Forest Park. The Forest Park Management Plan very clearly lays out that all other alternatives must be fully studied and utilized if possible.
3. Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park. It's very clear that PGE would like to lg a much larger park of this park if this initial project is approved.

Sincerely,

Hazel Gross

Sent with [Proton Mail](#) secure email.

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:37:19 AM

---

**Christine Caruso** (she/her)  
Senior Planner, MArch  
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503-865-6420 (cell)

[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)

Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

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**From:** Beth Melville <bethrmelville@gmail.com>  
**Sent:** Monday, December 2, 2024 5:00 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

1. PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.
2. PGE's Alternatives Analysis shows there are possible locations outside Forest Park.
3. Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park

Please reject PGE's terrible proposal; it damages a remarkably beautiful part of Portland. We cannot take these special places for granted.

Forest Park is important to my friends and family. It's a place for respite, peace and recreation.

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:37:33 AM

---

**Christine Caruso** (she/her)  
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Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

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**From:** Aimee Pomerleau <aimee@pomerleau.org>  
**Sent:** Monday, December 2, 2024 5:16 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

Forest Park is such a precious stretch of forest so close to the City. It is a destination for travelers, a refuge for city-dwellers, and most importantly, a residence for all the trees and creatures. I have hiked several sections of the Wildwood Trail, and hope one-day to complete all 30 miles of the trail. Just last month, I took my out-of-town visiting sister there on a lovely hike, along with my spouse and another Portland friend. My friend is a cancer survivor, and she mentioned how her frequent hikes here were an important part of her healing.

PGE's proposal to develop inside Forest Park is distressing in these times, when the impact of the climate change is ever apparent. We need to preserve this tree canopy to keep our city cooler and clean our air. This proposal fails to meet the criteria laid out by the Forest Park Natural Resources Management Plan to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings doesn't align with this goal. There are alternatives outside of Forest Park that this project could be located. Lastly, I am concerned this project could open the door to future phases of PGE development in Forest Park, leading to more ecological destruction of the park.

I am asking you to please reject PGE's proposal.

Thank you,

Sincerely, Aimee Pomerleau

**From:** [Ary Solomon](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** DENY Land use permit for PGE!!!  
**Date:** Wednesday, December 4, 2024 11:37:38 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause **significant impacts to Forest Park and the surrounding ecosystem**, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides **crucial habitat for the imperiled Northern Red Legged Frog**. These impacts are **directly in conflict** with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am **strongly opposed to this project** due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. **Please refuse PGE’s land use permit.**

I have lived in Portland for almost a decade, and have been to Forest Park countless times. I am appalled this land use permit is even being considered! Especially in this current political and physical climate we are in, **denying this land use permit is the only moral decision.**

Thank you for your consideration.

Ary Solomon  
Portland Resident

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:37:53 AM

---

**Christine Caruso** (she/her)  
Senior Planner, MArch  
Title 33 - Land Use Services Division

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503-865-6420 (cell)

[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)

Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

---

**From:** Monte Garrett <montegarrett007@gmail.com>  
**Sent:** Monday, December 2, 2024 6:29 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Please consider the following thoughts:

PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. Removing 150-year-old maturing trees, and replacing them with oak saplings does not come close to replacing the unique impacted habitat. PGE's Alternatives Analysis shows there are possible locations outside Forest Park that should be further studied.

- The NRMP requires that mitigation take place in the same unit that is impacted. PGE's plan to fund habitat enhancements in other units of the park does not meet that requirement.
- The ecosystem function lost through significant disruption of two streams and permanent filling of two wetlands is not adequately replaced with monoculture of oaks, which take 100+ years to reach maturity.
- This project could set a precedent for future phases of PGE's project and other development in Forest Park, further conflicting with the management plan.

Monte Garrett, Certified Wildlife Biologist  
Retired from PacifiCorp



**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:38:07 AM

---

**Christine Caruso** (she/her)  
Senior Planner, MArch  
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---

**From:** Debby Patten <debby.patten@gmail.com>  
**Sent:** Monday, December 2, 2024 6:44 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Please don't touch Forest Park! It's our Crown Jewel!

Debby Patten  
Sent from my iPhone

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:38:24 AM

---

**Christine Caruso** (she/her)  
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Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

---

**From:** Audrey Addison <audrey.e.addison@gmail.com>  
**Sent:** Monday, December 2, 2024 6:46 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Portland Staff,

I'm contacting with great concerns regarding PGE's current project proposal regarding Forest Park.

I've lived in Portland for 20 years and Forest Park was one of the original reasons I moved here and it's a big part of why I stay. My husband and I own a home in St John's, steps from Forest Park just beyond the St John's bridge. We've biked from our house to the Leif Erikson's trail, we've hiked the Wildwood Trail and listened to Great Horned Owls hooting. We go to exercise, clear our heads, to spend time in nature and be at peace. To us it's our church. Forest Park's benefits are immeasurable, but only if we keep it preserved.

PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. PGE's Alternatives Analysis shows there are several possible locations outside Forest Park. Approving this project could set a precedent for future phases of PGE's project and other development in Forest Park. It's too great a risk to take lightly when alternatives exist.

I ask that you please reject PGE's proposal.

Respectfully,  
Audrey Addison  
N PDX Resident

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Harborton PGE  
**Date:** Wednesday, December 4, 2024 11:40:22 AM

---

**Christine Caruso** (she/her)  
Senior Planner, MArch  
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Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

---

**From:** Carol Armstrong-lovanovici <carolcosmoart@gmail.com>

**Sent:** Monday, December 2, 2024 3:50 PM

**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>

**Subject:** Harborton PGE

Dear Morgan Steele,

When I first moved to Portland, the first thing that struck me was how intertwined the city and nature are. I could be downtown, surrounded by skyscrapers, and then drive 5 minutes and be in old-growth forest. Forest Park is an incredibly special place, for so many reasons. It provides

a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a

place where I can breathe deeply and remember that I'm a part of the natural world, too.

Having

a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources

Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down

power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural

loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people,

the city, and our future generations.

Sincerely

Carol Armstrong-Iovanovici

Portland

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Protect Forest Park  
**Date:** Wednesday, December 4, 2024 11:42:38 AM

---

**Christine Caruso** (she/her)  
Senior Planner, MArch  
Title 33 - Land Use Services Division

Portland Permitting & Development - City of Portland  
503-865-6420 (cell)

[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)

Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

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**From:** Sarah Baker <sarahrochellebaker@gmail.com>  
**Sent:** Monday, December 2, 2024 6:21 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Protect Forest Park

Hello Morgan,

I am writing to express my concern over PGE's proposal for Forest Park. Forest Park is a key part of the magic of Portland. That a wild space is so close to the city and available to all, is really special. We are in a climate crisis and we need our wild spaces for both the health of our planet and community and also for our mental health. Please protect Forest Park and reject PGE's proposal.

3 key reasons to reject PGE's proposal:

1. PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.
2. PGE's Alternatives Analysis shows there are several possible locations outside Forest Park.
3. Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park

Thank you,  
Sarah

--

Sarah Baker  
She/They

[Styled By Baker](#)

[Making Earth Cool](#)

[Earth First Production Services](#)

Portland, OR USA

C: [831.252.2223](#)

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Public Comment concerning Forest Park  
**Date:** Wednesday, December 4, 2024 11:42:56 AM

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**Christine Caruso** (she/her)  
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**From:** Fey Wolf <[feywolfhealing@gmail.com](mailto:feywolfhealing@gmail.com)>  
**Sent:** Monday, December 2, 2024 3:40 PM  
**To:** Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)>  
**Subject:** Public Comment concerning Forest Park

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

With Care,  
Felicia Pays





**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: LU 24-041109 CU EN GW - Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 11:44:46 AM

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**Christine Caruso** (she/her)  
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**From:** Lynn Herring <lynnhe@outlook.com>  
**Sent:** Monday, December 2, 2024 5:38 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re: LU 24-041109 CU EN GW - Harborton Reliability Project

To All It May Concern,

In response to the Portland General Electric (PGE) proposal (aka the Harborton Reliability Project) to the City of Portland to update and expand its power grid infrastructure in one of our area's crown jewels - Forest Park,

I am writing to point out the following adverse impacts that the proposal would cause:

- Severely impact 4.7 acres of maturing wildlife habitat in Forest Park -- vital habitat for red-legged frogs, a sensitive species in Oregon.
- Directly contradict the top priority in the Forest Park Natural Resources Management Plan -- manage the forest to become Old Growth.
- Set a bad precedent for future phases of PGE's project and other development in Forest Park -- further conflict with the management plan.

Furthermore, the mitigation plan is inadequate for the following reasons:

- The NRMP requires that mitigation take place in the same unit that is impacted.
- The ecosystem function lost through significant disruption of two streams and permanent filling of two wetlands is not adequately replaced with monoculture of oaks, which take 100+ years to reach maturity.

In addition, there is a failure of interest in community resiliency as follows:

- PGE failed to release the Toth Report, which showed that viable alternatives existed, until Oct 2024.

- PGE has not been transparent about their plans for future phases and its impact on habitat.

I urge you to examine other possible locations outside Forest Park for expansion of the PGE power grid.

For Stewardship of the Forest Park ecosystem,

Lynn Herring

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:49:15 AM

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**Christine Caruso** (she/her)  
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---

**From:** Kristen Sage <kristensage@gmail.com>  
**Sent:** Monday, December 2, 2024 6:26 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** RE: LU 24-041109 CU EN GW

Dear Morgan Steele-

I am writing to urge you to reject PGE's proposal. Allow me to share with you why it is so important for you to reject this proposal:

I have lived in Portland since the 1990's and Forest Park has been my backyard for most of those 34 years. I live in the St Johns area and literally find myself in Forest Park almost once a week, year round. This is a rare and exceptional park and has been and still is the pride and joy of our Portland community. We literally boast one of the largest city parks in the United States and that is something to be proud of. I have also traveled and experienced other city parks, from Namsan Park in Seoul, South Korea to Englischer Garten in Munich, Germany and I always come home to Forest Park and find myself in awe at the beauty that we have retained in this sanctuary forest. No park compares to the raw, natural beauty of this park. In the early 1900's, the Olmstead's and other civic minded people understood how important it was to preserve this natural area and it is our civic duty to maintain this land for decades forward.

Not only is this park the place that I run and hike at least once a week, it is also the place where I raised my children to learn to love the forest. This is the park where my kids learned how to identify trees, and all the variety of mushrooms we could find. We learned about spring flowers and fell in love with pink and white trilliums. My kids learned about nurse logs and got to watch over time the tiny ecosystem these logs created. We made up ghost stories on our way to the witch's castles and princess stories for all the blue diamond mile markers we came across. We've hiked the entire length of the Wildwood trail (broken up in 5 separate hikes, hiking a 6-8 mile section each time). During the COVID lockdowns, we read the Wildwood series and dreamed of the fantasy world of Prue and her adventures to find her brother and all the forest animals that inhabited the story and our imaginations. It was also one of the best

places to escape the fear and uncertainty that the pandemic brought during the lockdowns. When guests are in town to visit, we will always take them on one of our favorite loop hikes because we enjoy sharing the beauty of this forest and love watching their faces light up as you simply slip into an ancient forest within minutes from our house.

I can't begin to tell you how deeply magical and inspiring this park is. And how heartbroken we would be if PGE's proposal to clear cut 4.7 acres of 150+ year old Douglas Fir and bigleaf maples and to remove 5 gorgeous white oak trees that are estimated to be anywhere from 200-500 years old. This proposal will also permanently fill two wetlands and disrupt two streams that support multiple species of aquatic life. And the writing is on the wall, if Phase 3 is approved, PGE will use this as their lever to move forward to Phase 5, which would likely impact 15 acres of this beautiful, majestic forest. This park is not just a natural joy to me and so many who live near it, it also provides critical refuge for hundreds of native wildlife and plant species and also acts as an important air and water filter.

It is critical to point out a few other key reasons why you must reject PGE's proposal:

1. PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.
2. PGE's own analysis shows there are several possible locations outside of Forest Park. It is literally possible for them to update their power grid without impacting Forest Park at all. And they've known this since 2022.
3. Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park.

Forest Park is a deeply precious resource and we must treat it as such. It is the heart and lungs of our city and we must protect it. For the sake of our future, for the sake of the priceless wisdom that is embedded in the bark of these ancient trees, for the sake of the animals that make their home in these woods, and for the sake of future generations, please, please reject PGE's proposal.

Respectfully,  
Kristen Meyers  
Portland, Oregon

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: LU24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:49:36 AM

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**Christine Caruso** (she/her)  
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---

**From:** Kathryn Sheibley <kssheibley@gmail.com>  
**Sent:** Monday, December 2, 2024 2:55 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re: LU24-041109 CU EN GW

Dear Morgan Steele,

I urge you to reject PGE's proposal to develop inside Forest Park. The proposal contradicts the top priority of the Forest Park Resources Management Plan to support the forest in becoming an old-growth forest. PGE's analysis has shown that there are several alternative locations outside Forest Park. Finally approving this project could set the precedent for future development in Forest Park.

Thank you for your time and consideration of this important issue affecting the city, its people and future generations.

Sincerely,  
Kathryn Sheibley

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fw: Re:LU 24-041109 CU EN GW – Oppose PGE’s Harborton Reliability Project in Forest Park  
**Date:** Wednesday, December 4, 2024 11:49:55 AM

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**Christine Caruso** (she/her)  
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**From:** Shaina Dickson <[shaina.m.dickson@gmail.com](mailto:shaina.m.dickson@gmail.com)>  
**Sent:** Monday, December 2, 2024 5:57 PM  
**To:** Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)>  
**Subject:** Re:LU 24-041109 CU EN GW – Oppose PGE’s Harborton Reliability Project in Forest Park

Subject: Re:LU 24-041109 CU EN GW – Oppose PGE’s Harborton Reliability Project in Forest Park

Dear Morgan Steele,

I am writing to express my opposition to Portland General Electric’s (PGE) proposed Harborton Reliability Project, which threatens to destroy 4.7 acres of maturing wildlife habitat in the northernmost section of Forest Park. As a resident and advocate for our community’s natural spaces, I urge the city to reject this proposal and demand a more sustainable approach that aligns with the Forest Park Natural Resources Management Plan (NRMP).

Forest Park is a vital ecological and recreational asset to Portland, and PGE’s proposal contradicts the NRMP’s two primary goals:

1. Growing an ancient forest.
2. Protecting and enhancing the forest for educational and recreational opportunities.

The proposed project would remove 150-year-old trees and significantly disrupt two seasonal streams and wetlands. Replacing these ecosystems with a monoculture of oak saplings falls drastically short of mitigating the ecological damage and undermines decades of work toward restoring Forest Park to old-growth conditions.

Additionally, PGE’s Alternatives Analysis has shown that viable alternatives outside Forest Park exist and should be thoroughly explored. Approval of this project would set a dangerous precedent, paving the way for future phases of the Harborton Reliability Project and other developments that could further degrade Forest Park’s fragile ecosystems.

Moreover, PGE's mitigation strategy does not comply with the NRMP's requirement to conduct restoration efforts within the same impacted unit. Instead, the plan diverts resources to other areas of the park, failing to adequately address the permanent ecological harm caused by the project.

The lack of transparency around the Toth Report, which confirmed alternative solutions, and the limited details provided about future phases, casts doubt on PGE's genuine commitment to community resiliency. These shortcomings emphasize the need for a more responsible and transparent approach to addressing Portland's energy needs.

I strongly urge the city to reject this proposal and advocate for solutions that prioritize the health and sustainability of Forest Park and its surrounding communities.

Thank you for considering my comments and for your work to protect Portland's natural resources.

Sincerely,  
Shaina Dickson

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:51:31 AM

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**Christine Caruso** (she/her)  
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**From:** corrieb@ix.netcom.com <corrieb@ix.netcom.com>  
**Sent:** Monday, December 2, 2024 8:44 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re: LU 24-041109 CU EN GW

Dear Morgan Steele,

I am writing in regards to PGE's proposal to develop inside Forest Park. I'm concerned about this proposal for many reasons, not the least of which is that Forest Park is a unique Portland resource, one that helps define this city, and it should be treated that way. Portlanders' ability to visit an old-growth forest within a few minutes of downtown is special, and should be protected.

PGE's proposal to develop inside Forest Park is problematic because it direct contradicts the top priority of the Forest Park Natural Resources Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees does not align to this goal, nor does it serve to protect and enhance the forest for educational and recreational purposes. Even if PGE replants young native shrubs and oaks, it would take longer than our lifetimes to replace the mature forest that is there, which makes no sense. It would also disrupt two streams and permanently fill two wetlands, which is certainly not protecting or enhancing the forest.

PGE's own alternatives analysis shows that there are other possible locations to update and expand their power grid, options that have NO impact to Forest Park and don't require clearcutting and destroying forests, streams, and wetlands. There's simply no need to cause this damage. Also, approving this project could set precedent for further developing parts of Forest Park, further contradicting the park's management plan. PGE has already said this is one phase of a multi-phase project, and if this phase is allowed to proceed, then it'll make it easier to just keep cutting down trees to expand.

I love Forest Park. My children and I have spent countless hours exploring and enjoying Forest Park,



and it would be shameful to allow to it to be degraded when it's simply not necessary. I urge you to reject PGE's proposal and keep Portland's jewel of an urban forest intact for all of us.

Sincerely,  
Corrie Bates

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:53:35 AM

---

**Christine Caruso** (she/her)

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---

**From:** Kara Chanasyk <kara.chanasyk@gmail.com>  
**Sent:** Monday, December 2, 2024 9:55 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Hello Morgan,

I appreciate you reading this email and taking my comments to heart. I am a friend and lover of Forest Park, one of the largest urban parks in the United States. I am so proud of Forest Park and what it offers Portlanders - a rich resource full of recreational opportunities as well as climate resiliency. It is a visual landmark in our skyline and an urban asset that brings Portlanders pride. Over the last 20 years, I have enjoyed the trails throughout Forest Park, both for hiking and running, often multiple times per week, all year round. I work with the No Ivy League to pull ivy to preserve the trees that tower above us.

So when I heard about the PGE **Harborton Reliability Project** proposal, I was deeply saddened. I am baffled by how PGE's proposal is under consideration, given their proposed approach directly contradicts the goals and key guidelines outlined by the Forest Park Natural Resources Management Plan including:

1. grow an ancient forest
2. protect/enhance the forest for education/recreational opportunities.

I believe there must be another, better way to address PGE's project needs.

There are alternative, viable locations located outside Forest Park that have been identified by PGE's Alternatives Analysis. I urge you to pursue these alternative locations.

Also, if this proposal is adopted, how could this not become a new standard, further compromising

the park in the future as more proposals come under consideration? Please do not allow this to set new precedents for development in our beloved Forest Park.

I urge you to REJECT PGE's proposal.

Thank you so much for your attention to this important matter!

Sincerely,

Kara Chanasyk

5817 NE Sumner Street, Portland, OR 97218

503-236-1544

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:54:04 AM

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**Christine Caruso** (she/her)  
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**From:** Russ Wood <wood.russellc@gmail.com>  
**Sent:** Monday, December 2, 2024 9:28 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Dear Morgan Steele

I'm asking that you reject PGE's proposal to cut down mature trees and develop inside Forest Park as part of PGE's Harborton Reliability Project.

My partner and I moved to Portland on the exact day the first Covid case in Oregon was reported. Obviously, we didn't know what was coming our way, but Forest Park became our refuge and ultimately a big reason why we stayed in this city.

During those difficult early years here, Forest Park was the place we felt safe, hiking and cycling 2 - 3 times a week. Later, we felt strongly enough to become volunteers, clearing ivy from trees, raking the trails to prevent damage from rain and wear and tear, joining others every few weeks to help preserve it.

So, you can understand how worried we are by PGE's proposal to develop inside Forest Park. We believe it fails to meet most of the criteria for development demanded by the Forest Park Natural Resources Management Plan.

What we are asking for:

- **No old tree destruction.** Cutting down mature trees and replacing them with saplings fails spectacularly to support the top priority of the Forest Park Natural Resources Management Plan: to support the forest in becoming an old-growth forest.

- **No precedent for future development.** If approved, this project sets a precedent for future development in Forest Park that would further compromise the environment of the Park for all its users. PGE has stated that this is a multiphase project, with more phases of development to come. More trees cut down, streams degraded, and habitats lost.

- **Not in Forest Park.** PGE's own analysis has shown that there are numerous alternative locations outside Forest Park to locate the project. So, it is possible to update their power grid without impacting Forest Park at all.

Morgan, please help protect one of the true jewels of Portland. As the city changes dramatically, please preserve one of its most distinctive and healthful assets.

Sincerely,

Russell Wood

NE Portland homeowner

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:54:40 AM

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**Christine Caruso** (she/her)

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**From:** Fiona Meier <[fionameier@yahoo.com](mailto:fionameier@yahoo.com)>  
**Sent:** Monday, December 2, 2024 9:23 PM  
**To:** Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)>  
**Subject:** Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

I am writing to ask the City of Portland to reject PGE's proposal to cut down mature trees and develop inside Forest Park as part of PGE's Harborton Reliability Project.

Upon moving to Portland, I knew that exploring and getting to know the largest urban park in America would be on my list. Since then, not only have I hiked many trails, but have also volunteered my time to brush and rake the trails and remove invasive ivy. This has provided a first hand experience of the range of watersheds and habitats that Forest Park provides to the residents of Portland.

PGE's first-choice solution of development inside Forest Park is highly concerning.

- Cutting down mature trees and replanting with saplings goes against the Forest Park Natural Resources Management Plan's top priority: Managing the forest towards older, ancient growth.
- It appears alternative locations and routes exist outside of Forest Park that can accomplish PGE's stated goal of updating the power grid; and that this has been acknowledged by PGE's own analysis and consultants.
- Approval by the City of Portland sets a precedent for additional development in Forest Park, whether for additional power grid updates or alternative reasons.

For these reasons, I ask that PGE's proposal be rejected and the objective of managing Forest Park to become a self sustaining, old growth forest continues to be supported for the Portland residents of today and tomorrow.

Sincerely,

Fiona Meier  
NE Portland resident

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:55:28 AM

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**Christine Caruso** (she/her)

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---

**From:** Lloyd Vivola <nouveladam@hotmail.com>  
**Sent:** Monday, December 2, 2024 9:02 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

I am writing to voice my opposition to PGE's Harborton Reliability Project as regards any new land use in Forest Park.

Disrupting nearly 5-acres of secluded forest and wildlife habitat may seem insignificant to PGE, but in fact it represents a vanguard assault on the biological integrity and spiritual sanctity of Forest Park as legally protected by goals stated in the Forest Park Management Plan, namely, managing the forest in a way that enhances old growth while ensuring the future recreational value and educational potential of Forest Park as such.

As a nature enthusiast and forest advocate who hikes Forest Park and loves this section of the park in particular, I understand all too well how fragmentation can undermine both natural forest processes and the experience that visitors seek in places like Forest Park. I am also troubled by any plan that would introduce a destructive precedent for further development in what is an iconic Portland natural and public resource.

PGE must be steered to pursue a potential project location outside the park as so addressed in its own Alternatives Analysis. The City of Portland should also be committed to ensuring that this alternative design can succeed.

Thank you for receiving public comments.



Lloyd Vivola  
105 NE Beech Street  
Portland, Oregon 97212

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:56:50 AM

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**Christine Caruso** (she/her)

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Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

---

**From:** Alison Jordan <jordan717@gmail.com>  
**Sent:** Monday, December 2, 2024 10:28 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

When I moved to Oregon 10 years ago, Forest Park was the very first place I visited. It became my introduction to the unique connection between Portland and nature—a relationship that still amazes me today. I remember being struck by how I could leave the bustling city and, within minutes, find myself surrounded by towering old-growth trees.

Forest Park isn't just a forest; it's a place where I've found solace, perspective, and connection. It's where I go to breathe deeply, to clear my mind, and to remind myself that I'm part of something bigger. For me, it's become one of those special places I tell every visitor about, because there's truly nothing like it in any other city I know.

Beyond my personal connection, Forest Park is an ecological treasure. It provides a haven for wildlife, cleans our air, filters our water, and helps keep our city cool. But more than that, it's a gift—one that nurtures both our environment and our spirit. Recognizing its value and protecting it feels deeply personal to me because it's such an integral part of so many people's story here in Oregon.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an

old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,  
Alison

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:57:15 AM

---

Christine Caruso (she/her)  
Senior Planner, MArch  
Title 33 - Land Use Services Division

Portland Permitting & Development - City of Portland  
503-865-6420 (cell)  
[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)  
Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

-----Original Message-----

From: Jackie Larson <[jakaloca@gmail.com](mailto:jakaloca@gmail.com)>  
Sent: Monday, December 2, 2024 8:59 PM  
To: Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)>  
Subject: Re:LU 24-041109 CU EN GW

Please, please do not remove any acreage from Forest Park. Our park is a unique and iconic draw for new and existing residents. It has a truly precious national and international reputation.

The expanse of Forest Park brings local, nearby, farther away, and far-far-flung visitors and new inhabitants to our city and surrounding communities. All while serving as home to habitat / wildlife that has been encroached upon from other angles.

I recruit people to the Portland-metro who contribute to the economy and whether they are athletes or recreationalists — or simply thrilled to bring other guests to the area to run, walk, bird, etc — this land is a major highlight and and respite from other aspects of the city.

We must continue to preserve this special sanctuary that so many thoughtful people in our city's history have shown the foresight to generously donate, actively conserve, and voluntarily care for.

Generations have been able to escape into nature in Portland's backyard. Let's stay true to that opportunity for all. It's worth the effort.

-Jackie Larson  
7100 N Haven Ave  
Portland (near St Johns)

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:57:30 AM

---

**Christine Caruso** (she/her)  
Senior Planner, MArch  
Title 33 - Land Use Services Division

Portland Permitting & Development - City of Portland  
503-865-6420 (cell)

[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)

Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

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**From:** Faith Danforth <sevrance@gmail.com>  
**Sent:** Monday, December 2, 2024 8:30 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Dear Morgan Steele & our other hardworking government team members,

I'm writing as a long time Portlander and regular visitor to and user of Forest Park. Forest Park is one of the primary reasons I continue to live in Portland; it is so vast, so wild, and so accessible. It is a large part (literally) of what makes Portland great. I would notice and be saddened by any reduction in the forest stock in Forest Park, especially if it were in service of a privately held utility company, and not in service of the health and well being of the forest itself.

I am concerned about PGE's proposed changes to Forest Park, which include removing significant numbers of trees (more than 4.7 acres ultimately).

PGE's proposal directly contradicts the top priority of the agreed-upon forest management plan (Forest Park Natural Resources Management Plan), to manage Forest Park towards old growth status.

PGE produced a good analysis of alternatives, which include more than 1 acceptable option that is outside of Forest Park.

And, as history has shown, if this is approved, it could make it more acceptable (or make PGE feel more entitled) to pursue additional logging and forest removal within Forest Park, all in the name of cheaper or more efficient utility service.

I am humbly asking you and the other civil servants working on this issue to reject PGE's proposal

and guide them to alternative sites that are outside of Forest Park. PGE's proposal is very concerning, and would lead to real loss of ecological and cultural resources for Portland.

Forest Park is the gem of Portland. Please take all actions that support its maturation into old growth forest and its preservation as a place of learning and recreation for the citizens of this city, as outlined in the Forest Park Natural Resources Management Plan.

Many thanks,  
Faith Danforth  
7003 NE Everett St  
Portland OR 97213  
503-290-4104

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:57:42 AM

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**Christine Caruso** (she/her)  
Senior Planner, MArch  
Title 33 - Land Use Services Division

Portland Permitting & Development - City of Portland  
503-865-6420 (cell)

[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)

Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

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**From:** BARBARA BUSHELL <barbarabushell@comcast.net>  
**Sent:** Monday, December 2, 2024 7:52 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

As an active member of the Mazamas, a 130 year old local hiking and mountaineering club, I have hiked all over Forest Park with the Mazamas and with many out of town guests so they can get a taste of our precious and unique wilderness experience located within only minutes of downtown Portland.

Out of town visitors find both Forest Park and Multnomah Falls unbelievably and breathtakingly beautiful. No other urban park in the United States offers anything comparable in quantity and quality to Forest Park. Like Multnomah Falls, Forest Park is irreplaceable. Absolute treasures for sure!

PGE's Harborton Reliability Project, which involves clear cutting almost five (5) acres in Forest Park, will not only destroy a living sanctuary for evolving old growth ecosystems but it also opens the door for future and further destruction of Forest Park.

PGE's own study shows there are other viable locations outside of Forest Park to locate the expansion project.

**The project is a violation of law: The Forest Park Natural Resources Management Plan, Ordinance 168509, was unanimously passed by the City of Portland in 1995.**

Forest Park is a precious resource and we need to treat it as such. PGE's Harborton Reliability Project does not align with Forest Park's management plan and would

result in significant ecological and cultural loss. I am asking you to reject PGE's proposal for the sake of the trees, the wildlife, the people, the city and our future generations.

Thank you for your consideration,

Barbara Bushell  
611 SE Peacock Lane  
Portland, OR 97214



**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:58:02 AM

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**Christine Caruso** (she/her)

Senior Planner, MArch

Title 33 - Land Use Services Division

Portland Permitting & Development - City of Portland

503-865-6420 (cell)

[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)

Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

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**From:** Marlee M <marlee.m.work@gmail.com>  
**Sent:** Monday, December 2, 2024 7:51 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

I'm relatively new to Portland, and I have Forest Park to thank for tipping the scales in favor of making my new home here. Learning that within ten minutes of leaving home or work in the heart of the city I could find myself on peaceful, winding trails among the towering cedars of the Park without a building, car, or another person in sight shocked my Arizona sensibilities in the best possible way. Since moving here, I've often found myself walking along a trail only to be stopped in my tracks by the stunning beauty around me— golden beams of light filtering through the canopy in the afternoon sun, or that wonderful earthy smell and the vivid greens of the moss after days of rain. To say it's invigorating or revitalizing is an understatement. For me and many others, Forest Park is much more than just a park—it's a sanctuary and an ecological marvel, providing critical habitat for countless species of wildlife. It's the place I go to ground myself after a long day at the hospital, reconnect with nature, and gain perspective. The value of such a resource, both for its environmental and mental health significance, cannot be overstated.

Forest Park protects every living thing around it, acting as a natural buffer against the heat of increasingly intense summers, as well as cleaning our air and water. In return we have a duty to protect it from threats such as PGE's development proposal, which would not only damage its fragile ecosystem but also cause an inevitable cascade of negative consequences affecting all of us.

PGE's proposal fails to meet the key criteria for development outlined in the Forest Park Natural Resources Management Plan, and it undermines the very goals that plan was designed to protect.

1. **The proposal contradicts the forest's primary objective of transitioning to old-growth conditions.** Cutting down mature trees to install power infrastructure fundamentally disrupts this process. These trees are irreplaceable in the timeframe of a human lifetime, and planting saplings cannot make up for their loss.
2. **There are viable alternatives outside Forest Park.** Even PGE's own analysis indicates that this project can be accomplished without disturbing the park's delicate ecosystem. Developing within Forest Park is not a necessity—it's a choice, and one that prioritizes convenience over conservation.
3. **Approving this project risks opening the door to further development in the park.** PGE has already stated that this is just one phase of a multiphase initiative. Allowing this project to proceed sets a dangerous precedent for future expansions that could result in even greater tree loss, habitat destruction, and waterway degradation.

Forest Park is more than just a local treasure; it is a rare and irreplaceable resource. Its worth cannot be measured in dollars or kilowatts. For me personally, it's a space of solace and renewal, as I know it is for countless others. To lose even a fraction of this refuge to PGE's proposal would be a tragic and unnecessary mistake.

**I urge you to reject PGE's proposal. It is not in alignment with the Forest Park Natural Resources Management Plan, and it would cause profound and lasting harm—both to the park's ecosystem and to the people who cherish it.** Too much of our natural world is being decimated by human activity little by little. Let's ensure that Forest Park does not fall prey to this pattern of insidious erosion. Let's continue to protect it as has been Portland's prerogative for decades.

Sincerely,  
Marlee Mason-Maready

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:58:14 AM

---

Christine Caruso (she/her)  
Senior Planner, MArch  
Title 33 - Land Use Services Division

Portland Permitting & Development - City of Portland  
503-865-6420 (cell)  
[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)  
Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

-----Original Message-----

From: [corvus.corax@mac.com](mailto:corvus.corax@mac.com) <[corvus.corax@mac.com](mailto:corvus.corax@mac.com)>  
Sent: Monday, December 2, 2024 7:35 PM  
To: Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)>  
Subject: Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

A few weeks ago, I went hiking with a friend in Forest Park off of Springville Rd. Despite being right next to Portland, we had a serene experience walking under the moss-covered trees, finding banana slugs and mushrooms, and listening to bird song. Forest Park is an amazing place and well worth preserving intact.

I am concerned about PGE's proposal to develop inside of Forest Park. The Forest Park Natural Resources Management Plan prioritizes supporting the maturation of Forest Park into an old-growth forest. PGE's proposal contradicts this plan. Secondly, why should Forest Park be sacrificed for PGE's plan if they have not adequately explored alternative locations for their project? Lastly, approval of PGE's plan to develop Forest Park sets a dangerous precedent for future developments that further contradict the mission of Forest Park as outlined in the Management Plan.

I am asking you to reject PGE's proposal and protect Forest Park for future generations to enjoy.

Sincerely,  
Diana Boss

**From:** [Jasper Kelley](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Don't let PGE commit MURDER  
**Date:** Wednesday, December 4, 2024 1:49:55 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration

**From:** [Katie Douglas](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Deny PGE Development in Forest Park  
**Date:** Wednesday, December 4, 2024 2:00:22 PM

---

Dear Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [nicole kemmer](#)  
**To:** [Caruso, Christine](#)  
**Subject:** DEFEND FOREST PARK  
**Date:** Wednesday, December 4, 2024 2:00:38 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clear cutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

The project fails to comply with the Forest Park Natural Resources Management Plan (NRMP)

The NRMP’s main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE’s project is not in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project OUTSIDE of Forest Park.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Mitchell Green](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Dylan Plummer](#); [Caruso, Christine](#); [Wheeler, Mayor](#); [Commissioner Ryan Office](#); [Commissioner Gonzalez Office](#); [Commissioner Rubio](#); [Commissioner Mapps](#); [tina.kotek@oregon.gov](#); [chris.warner@oregon.gov](#); [karin.power@oregon.gov](#); [sarah.means@oregon.gov](#); [info@keithwilsonformayor.com](#); [Jamie@jamiedunphy.com](#); [Info@lorettasmithpdx.com](#); [info@kanalforportland.com](#); [contact@elanaforportland.com](#); [Steve Novick](#); [info@angelitaforportland.com](#); [info@teachertiffanyforthepeople.com](#); [Info@oliviaforportland.com](#); [Damon Motz-Storey](#); [Micah Meskel](#); [Carole Hardy](#); [Mikey Brooks](#); [Brenna Bell](#); [Caruso, Christine](#); [Wheeler, Mayor](#); [counselor.green@portlandoregon.gov](#)  
**Subject:** Re: Opposition Letter to PGE's Proposed "Harborton Reliability Project" Transmission Line Through Forest Park  
**Date:** Wednesday, December 4, 2024 2:04:01 PM

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Thank you, Dylan, for this letter - please note I've copied my city email on this communication.

Sincerely,

Mitch Green  
Sent from my iPhone

On Dec 4, 2024, at 11:24 AM, Steele, Morgan  
<[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)> wrote:

Hello Dylan, et al.,

Your comments have been received and will be considered and included in the public record.

Best,

**Morgan Steele**

Senior Environmental Planner

Land Use Services, Environmental/Land Division Team

**City of Portland – Portland Permitting and Development**

1900 SW Fourth Avenue, Suite 5000

Portland, OR 97201

503-865-6437 (cell)

[morgan.steele@portlandoregon.gov](mailto:morgan.steele@portlandoregon.gov)

[www.portland.gov/ppd](http://www.portland.gov/ppd)

Work Hours: Monday-Friday 7:00-3:30 PT

The City of Portland ensures meaningful access to City programs, services, and activities to comply with Civil Rights Title VI and ADA Title II laws and reasonably provides: translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids and services. Request these services [online](#) or call 503-

823-4000, Relay Service: 711.

503-823-4000 Traducción e Interpretación | Biên Dịch và Thông Dịch | □

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Письмовий і усний переклад | Traducere și interpretariat | Chiaku me

Awewen Kapas | अनुवादन तथा व्याख्या

---

**From:** Dylan Plummer <dylan.plummer@sierraclub.org>

**Sent:** Wednesday, December 4, 2024 11:11 AM

**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>; Caruso, Christine <Christine.Caruso@portlandoregon.gov>; Wheeler, Mayor <MayorWheeler@portlandoregon.gov>; Commissioner Ryan Office <CommissionerRyanOffice@portlandoregon.gov>; Commissioner Gonzalez Office <gonzalezoffice@portlandoregon.gov>; Commissioner Rubio <Comm.Rubio@portlandoregon.gov>; Commissioner Mapps <MappsOffice@portlandoregon.gov>

**Cc:** tina.kotek@oregon.gov; Chris.warner@oregon.gov; karin.power@oregon.gov; sarah.means@oregon.gov; info@keithwilsonformayor.com; Jamie@jamiedunphy.com; Info@lorettasmithpdx.com; info@kanalforportland.com; contact@elanaforportland.com; Steve Novick <stevenovick96@gmail.com>; info@angelitaforportland.com; info@teachertiffanyforthepeople.com; info@oliviaforportland.com; mitch@mitch4portland.com; Damon Motz-Storey <damon.motz-storey@sierraclub.org>; Micah Meskel <mmeskel@birdallianceoregon.org>; Carole Hardy <cleehardy@gmail.com>; Mikey Brooks <mikey@forestparkconservancy.org>; Brenna Bell <brenna@350pdx.org>

**Subject:** Opposition Letter to PGE's Proposed "Harborton Reliability Project" Transmission Line Through Forest Park

To whom it may concern,

Find attached a letter from nine organizations, including the Sierra Club, stating our opposition to Portland General Electric's "Harborton Reliability Project" transmission line based on the potential ecological and economic impacts of the project as currently proposed.

Please reach out if you have any questions about the letter.

Thank you.

Dylan Plummer (he/him/his)

Campaign Advisor, Sierra Club

--

<~WRD0370.jpg>

**Dylan Plummer**

Campaign Advisor, Building Electrification, Sierra Club

he/him/his

Represented by [Progressive Workers Union](#)

cell: 541.531.1858

[dylan.plummer@sierraclub.org](mailto:dylan.plummer@sierraclub.org)





**From:** [not quite](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE permit for Forest Park  
**Date:** Wednesday, December 4, 2024 2:07:42 PM

---

Hello,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration,  
Veronica Little

**From:** [Jonathan Megginson](#)  
**To:** [Caruso, Christine](#)  
**Subject:** public comment on PGE's Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 2:08:33 PM

---

Hello,

I am a resident of Northeast Portland and am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. I frequently go to Forest Park to hike and take a mental health break in the trees. It is very special to me to have such a large expanse of forest so easily accessible within the city.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for the work you do for our city and for taking time to read my comments.

Jonathan Megginson

**From:** [Laura](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** Public Comment re: PGE Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 2:11:07 PM

---

To Whom It May Concern:

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Laura Scrimenti

**From:** [mattbosak@comcast.net](mailto:mattbosak@comcast.net)  
**To:** [Caruso, Christine](#)  
**Subject:** LU 24-041109 CU EN GW Forest Park  
**Date:** Wednesday, December 4, 2024 2:11:25 PM

---

Hi Christine,

I want to comment on PGEs Harborton Reliability Project and it's impact on Forest Park.

I work at Intel, a company who is purportedly a beneficiary and a primary reason why PGE is increasing it's infrastructure in Forest Park. Although I want Intel to succeed, I do not want that success to come at the expense of Forest Park. In my opinion, the time, care and resources it has taken to grow Oregon's "silicon forest" is minuscule compared to the time and care required to grow and now sustain Forest Park. It is also my opinion that Forest Park has far more long term utility to the people of Oregon and to the planet than the silicon forest ever could. Please do not give in to pressure to sacrifice an irreplaceable public resource simply for the convenience of some of the most powerful business interests in the state. They have resources to figure out another way to meet their needs. The park does not have such a luxury.

Also, this area of Forest Park is one of my personal favorites. It is less crowded than the southern sections and is where I personally like to hike the most.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Thank you,  
Matthew Bosak, Portland Resident

Get [Outlook for Android](#)

**From:** [Alissa Azar](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 2:17:01 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Sincerely, a concerned mother worried about the future of her child and community.

Alissa Azar

**From:** [Elm Lai](#)  
**To:** [Caruso, Christine](#)  
**Subject:** protect forest park!  
**Date:** Wednesday, December 4, 2024 2:18:54 PM

---

Hello!

I am a Portland resident, I've been here for 16 years.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Marv](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Harborton /Forest Park Clearcut  
**Date:** Wednesday, December 4, 2024 2:27:24 PM

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I'm a Columbia County resident and regular visitor to the Portland area and I strongly disapprove of this clearcut project. I understand and approve of infrastructure upgrades, but running an upgrade that seems to be entirely designed to service Intel through protected forest is not an acceptable solution. Go around, full stop.

Casey Stennick



**From:** [Rowan Schwartz](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project Public Comment  
**Date:** Wednesday, December 4, 2024 2:36:30 PM

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I am a Beaverton resident with community throughout the tri-county area, and professionally I work for a nonprofit that serves marginalized populations across the state of Oregon.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents as well as those who live in the greater Portland area.

The project would require the clear cutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. It is critical that Portland preserves the natural spaces that we have- not to destroy them to further the goals of private corporate interests.

As Oregon and the greater Pacific Northwest faces more frequent and severe impacts of climate change, the further disruption to ecologically significant parks will only serve to hasten further devastation caused to those most marginalized in our communities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and others in our state. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit. Thank you for your consideration,

Rowan Schwartz  
(they/them)  
Beaverton, OR

**From:** [Pine Leiser](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Save Forest Park  
**Date:** Wednesday, December 4, 2024 3:00:22 PM

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To whom it may concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the city previously noted, the Harborton Project would cause significant negative impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The Project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE’s powerline expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro, including facilities like the Intel expansion project. While PGE claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. I am STRONGLY OPPOSED to this project due to its ecological and economic impacts on wildlife and other Portland residents.

Please refuse PGE’s land use permit! Thank you for your consideration.

**From:** [heathera677](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Deny Forest Park power line expansion permit  
**Date:** Wednesday, December 4, 2024 3:01:21 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Heather Anderson

Sent via the Samsung Galaxy S22 Ultra 5G, an AT&T 5G smartphone

**From:** [Emma Rogers](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Portland Permitting and Development  
**Date:** Wednesday, December 4, 2024 3:11:55 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Anna Keeva](#)  
**To:** [Caruso, Christine](#)  
**Subject:** No to PGE's land use permit  
**Date:** Wednesday, December 4, 2024 3:28:22 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Forest Park is my favorite place in Portland and I spend time in those beautiful trees every week. I would be so upset if this city lost of huge piece of one of the most important natural spaces we have. That park is essential to so many of us. Portland's commitment to protecting natural spaces is part of what makes us such a wonderful city. Please refuse PGE's land use permit! Thank you for your consideration.  
Anna Keeva

**From:** [Katie Griesar](#)  
**To:** [Caruso, Christine](#)  
**Subject:** re: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 3:31:17 PM

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Dear Christine Caruso,

Forest Park is an incredibly special place, for so many reasons, and has honestly been a lifesaver for me and my mental and physical health on so many occasions and in so many ways. It provides a sanctuary for wildlife, its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we genuinely need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Thank you kindly for your consideration.

Sincerely,  
Katie Griesar

**From:** [Colin Mosgrove](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Harborton Project  
**Date:** Wednesday, December 4, 2024 3:46:40 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on Portland residents.

**Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.**

Please refuse PGE’s land use permit. A decision to refuse the project would be an act of love to the community and to the land. Thank you for your consideration.

Warmly,

Colin

**From:** [Alex Terlecky](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE and Forest Park  
**Date:** Wednesday, December 4, 2024 4:10:40 PM

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Hi Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

To provide you with a specific instance of another animal who will be affected, in addition to a frequent user of the park, I am a volunteer for the Harborton Frog Taxi, which works to shuttle northern red legged frogs across highway 30 each year so they can breed. This will affect this animal species by further limiting their already disappearing habitat. Here is a new article from OBP on what we do : <https://www.opb.org/article/2024/11/23/portland-northern-red-legged-frog-taxi-species-migration/>

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

In sum, please help keep what is left of our wonderful park in tact - it's already a remnant of what once was.

Thank you,  
Alex Terlecky  
NE Portland Resident



**From:** [Brian S Ellis](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park Clear Cutting  
**Date:** Wednesday, December 4, 2024 4:18:59 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Brian Stephen Ellis, Portland.

**From:** [Brandi Stack](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE Forest Park expansion  
**Date:** Wednesday, December 4, 2024 4:21:41 PM

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Hi there,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration. DON'T BE ON THE WRONG SIDE OF HISTORY ON THIS ISSUE.

**From:** [Louisa Ann](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Please deny PGE's land use permit  
**Date:** Wednesday, December 4, 2024 5:12:41 PM

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Hi Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

I am a fifth generation Oregonian and am sick to death of the sacrifice of our natural resources for the service of immediate tax dollars and big tech industry. Forest Park is a vital resource for our community- especially those without cars who can drive to the gorge or the coast for their time in nature. While the need for affordable housing and power is important, I'm urging you to stop this unnecessary and harmful project.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Strongly,  
Louisa

**From:** [Faith Nicholas](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Reject PGE Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 5:15:09 PM

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Dear Christine Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

Forest Park is a very special place to me and I consider it one of the main reasons I enjoy living in Portland and have stayed in Portland. Not many cities have such easy access to an incredible forest like Forest Park. I recreate in the park at least once a week and I love seeing everyone else out recreating in the park too, especially children. At the expense of sounding cheesy, my soul feels replenished after spending time in the park. If PGE's project moves forward, I worry it will be the start of a compromised future for Forest Park, where city residents and local wildlife will have access to a smaller and smaller forest.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological, economic, and spiritual impacts on myself and other Portland residents. I'm asking that you reject PGE’s land use permit.

Sincerely,  
Faith Nicholas  
Portland Resident

**From:** [Jess McCreary](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FOREST PARK PGE CLEAR CUT  
**Date:** Wednesday, December 4, 2024 5:15:46 PM

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am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

As a Portland resident, I DO NOT approve of this project and am extremely disappointed in the city for even considering this. PLEASE DENY THIS PROJECT

Jess McCreary  
jessmccreary.com  
6613452631

**From:** [Deidre Gordon](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Fwd: Forest Park destruction  
**Date:** Wednesday, December 4, 2024 5:34:09 PM

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Please don't kill the trees in forest park, even if intel and PGE give you lots of money. Those trees are important to many people and especially the creatures that live there. We are the only planet with life that we know of, and Portland is one of the most beautiful cities in America. Please don't damage that. It isn't worth it.

Deidre

Sent from my iPhone

Begin forwarded message:

**From:** Deidre Gordon <deidrezafar@gmail.com>  
**Date:** December 4, 2024 at 5:24:42 PM PST  
**To:** Morgan.Steele@portlandoregon.gov  
**Subject:** Forest Park destruction

Hi Morgan,

I love Forest park, it is an amazing natural area that supports the lives of so many species including us. The vastness, and the knowledge that it exists provides me with moments of satisfaction and relief as it stands as an island of resistance to the planetary destruction that overshadows my life. Please don't cut it down for intel and PGE. Intel is unlikely to get its big expansion, as there are many more competitive states trying for the superconductor bid, and there are areas that foster fewer at risk species in outer Hillsboro that would result in less destruction not just to the environment, but to the character of Portland.

Politicians always think people don't notice all the little ways that the commons become less capacious and rich, but even if the exact nature of the plunder is unclear, everyone can feel that one more thing is changing for the worse. Please don't let it be at one of the places that I have the best memories.

Deidre  
Sent from my iPhone

**From:** [Andrea Treadway](#)  
**To:** [Caruso, Christine](#)  
**Subject:** DENY PGE'S PERMIT / PROTECT WILDLIFE  
**Date:** Wednesday, December 4, 2024 6:01:13 PM

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Hi Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Andrea' Treadway  
Portland, Oregon resident and lover of Forest Park since 2015

**From:** [Geoff Albertson](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park PGE  
**Date:** Wednesday, December 4, 2024 6:22:38 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Geoff Albertson, Portland resident 97211

Sent from my iPhone



**From:** [Taylor Dunlop](#)  
**To:** [Caruso, Christine](#)  
**Date:** Wednesday, December 4, 2024 6:34:06 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Signed,  
Madison Taylor Dunlop

**From:** [Rachel Thai](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Protect Forest Park  
**Date:** Wednesday, December 4, 2024 6:36:10 PM

---

Hi,

My name is Rachel, I'm a Portland resident.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Rachel

Sent from my iPhone

**From:** [murrbrewster@icloud.com](mailto:murrbrewster@icloud.com)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE  
**Date:** Wednesday, December 4, 2024 6:47:40 PM

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Please do not rubber-stamp the clearcutting of the Harborton section of Forest Park. The need for power infrastructure is debatable, but the effects of clearcutting can be permanent. I urge you to hold off on this permit, especially inasmuch as it benefits primarily Intel and the like, at our expense. And at the expense—don't laugh—of the Northern Red-Legged Frog, a small creature Of Concern whose welfare has been championed by dozens of us volunteer frog shuttlers for many years. Their concerns are our concerns, and yours, ultimately. They, and those who share their habitat, deserve our advocacy, in the lack of their own lawyers. Thank you for exercising caution.

Mary (Murr) Brewster  
5106 NE 29th Avenue  
Portland OR 97211

**From:** [Cody Ellis](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Protect Forest Park  
**Date:** Wednesday, December 4, 2024 6:56:38 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Cody Ellis

**From:** [Otter](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Save Forest Park!  
**Date:** Wednesday, December 4, 2024 7:06:41 PM

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Hello my Name is Holly and I firmly believe that Forest Park MUST be protected. Our forests are shrinking every year and it is WRONG. The citizens of Portland will not stand for it. Please do everything you can to protect our trees and Forests that we love and enjoy so much. It's what makes Oregon different than many other states. Thank you for your time and consideration.

**From:** [Eden Lilley](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 7:06:56 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration,

Ian Lilley

Portland Resident

**From:** [Sterling Goldsby](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Wednesday, December 4, 2024 7:17:02 PM

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Dear Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Macey Bishop](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Please Save Forest Park  
**Date:** Wednesday, December 4, 2024 7:28:08 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. These areas mean the world to me. They are one of the main reasons I love living in Portland.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Macey Bishop



**From:** [Irbin Saucedo](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Wednesday, December 4, 2024 8:00:33 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological

and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan.

This project also goes against the values of the Portland area. An area known for its trees and natural beauty. PGE's lack of innovation should not come at the expense of our natural environment. Please reject PGE's proposal and maintain our community with Forest Park.

Thank you for consideration.

Irbin Saucedo Rosas  
Washington County Resident

**From:** [Ashlynn Fancher](#)  
**To:** [Caruso, Christine](#)  
**Subject:** DEFEND FOREST PARK  
**Date:** Wednesday, December 4, 2024 8:10:42 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Jessica Lackey](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Preserve Forest Park  
**Date:** Wednesday, December 4, 2024 8:35:11 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Kindest regards,

Jess Lackey

\*typos courtesy of my iPhone

**From:** [Chazaq Llinas](#)  
**To:** [Caruso, Christine](#)  
**Date:** Wednesday, December 4, 2024 9:13:18 PM

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Dear Christine Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,

Chazaq Llinas  
[chazaq@gmail.com](mailto:chazaq@gmail.com)  
(860)874-9288

**From:** [Laura Bartram](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Opposing Clear Cuts in Forest Park  
**Date:** Wednesday, December 4, 2024 9:15:10 PM

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Dear Christine Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Laura Bartram  
Portland OR 97217

**From:** [Ben Schaefer](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Protect Forest Park  
**Date:** Wednesday, December 4, 2024 9:22:32 PM

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To whom it may concern,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Ben Schaefer

**From:** [Melina Gold](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Public comment for Forest Park  
**Date:** Wednesday, December 4, 2024 9:31:20 PM

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Hello,

My name is Melina and I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts for all of those who inhabit the area. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

While I currently reside in Corvallis, I feel a deep connection to the beautiful land of Forest Park and make a point to visit whenever I am in Portland. It would be devastating on many levels to have this clear cutting go through.

Thank you for your time.

Warmly,  
Melina



**From:** [Sarah Adams Music and Healing](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Please oppose PGE clear cutting forest park  
**Date:** Wednesday, December 4, 2024 9:34:19 PM

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To whom it may concern

Please do not allow PGE to clear cut forest park. It would be very damaging to the forest and it's creatures!

Sarah Adams  
503-679-1399

**From:** [Steele, Morgan](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW Deadline to submit:  
**Date:** Tuesday, December 3, 2024 3:02:38 PM

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**Morgan Steele**

Senior Environmental Planner  
Land Use Services, Environmental/Land Division Team

**City of Portland – Portland Permitting and Development**

1900 SW Fourth Avenue, Suite 5000

Portland, OR 97201

503-865-6437 (cell)

[morgan.steele@portlandoregon.gov](mailto:morgan.steele@portlandoregon.gov)

[www.portland.gov/ppd](http://www.portland.gov/ppd)

Work Hours: Monday-Friday 7:00-3:30 PT

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503-823-4000 Traducción e Interpretación | Biên Dịch và Thông Dịch | 口笔译服务 |

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Traducere și interpretariat | Chiaku me Awewen Kapas | अनुवादन तथा व्याख्या

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**From:** Tracy Manaster Alifanz <tracy.manaster@gmail.com>

**Sent:** Tuesday, December 3, 2024 1:37 PM

**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>

**Subject:** Re:LU 24-041109 CU EN GW Deadline to submit:

To the City of Portland Permitting Department,

I'm submitting this response regarding the proposed PGE Harborton Reliability Project, permit application no. 2024-041109-000-00-LU, where PGE plans to create a connection to existing lines located in a remote area of Forest Park, next to high-voltage transmission lines. I fully support the proposed 1,400-foot westward alignment, which affects only a small portion of Forest Park, minimally impacting vegetation and habitat. Additionally, PGE's extensive mitigation plan should more than offset this impact.

I strongly oppose any alternative alignments along Highway 30, Marina Way, or Riverview Drive, heading north toward the Sauvie Island Bridge. These routes would also affect similar vegetation and habitat to connect to the same transmission lines through the Metro Greenspace

area.

After reviewing the permit application, PGE's detailed plans, and their thorough responses to the City's questions and concerns, I believe the proposed alignment is the best option. It's the shortest and least impactful route for everyone involved.

On the other hand, I'm against any alignment that travels north toward the Sauvie Island Bridge. As detailed in numerous reports, this would result in negative impacts not only to vegetation and habitat, but also to property owners' rights, scenic views from Sauvie Island, the Multnomah Channel, and hillside areas. Additionally, it would lead to an over-concentration of overhead utilities, further degrading the aesthetics of the surrounding neighborhoods.

Given PGE's solid track record and their comprehensive mitigation plans, the shorter, more direct alignment makes the most sense and addresses all concerns much more effectively than the alternatives.

All the best,

Tracy Manaster Alifanz

**To:** Portland Permitting and Development, Portland Mayor Wheeler, and Portland City Commissioners

[morgan.steele@portlandoregon.gov](mailto:morgan.steele@portlandoregon.gov), [Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov),  
[mayorwheeler@portlandoregon.gov](mailto:mayorwheeler@portlandoregon.gov), [CommissionerRyanOffice@portlandoregon.gov](mailto:CommissionerRyanOffice@portlandoregon.gov),  
[gonzalezoffice@portlandoregon.gov](mailto:gonzalezoffice@portlandoregon.gov), [comm.rubio@portlandoregon.gov](mailto:comm.rubio@portlandoregon.gov),  
[MappsOffice@portlandoregon.gov](mailto:MappsOffice@portlandoregon.gov)

**CC:** Governor Kotek, Portland Mayor-Elect Wilson, Portland Commissioners-Elect, Multnomah County Chair Vega Pederson, Multnomah County Commissioners, Portland Delegation of the State Legislature

[tina.kotek@oregon.gov](mailto:tina.kotek@oregon.gov), [Chris.warner@oregon.gov](mailto:Chris.warner@oregon.gov), [karin.power@oregon.gov](mailto:karin.power@oregon.gov),  
[sarah.means@oregon.gov](mailto:sarah.means@oregon.gov), [info@keithwilsonformayor.com](mailto:info@keithwilsonformayor.com), [Jamie@JamieDunphy.com](mailto:Jamie@JamieDunphy.com),  
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[stevenovick96@gmail.com](mailto:stevenovick96@gmail.com), [info@angelitaforportland.com](mailto:info@angelitaforportland.com),  
[info@teachertiffanyforthepeople.com](mailto:info@teachertiffanyforthepeople.com), [info@oliviaforportland.com](mailto:info@oliviaforportland.com), [mitch@mitch4portland.com](mailto:mitch@mitch4portland.com)

**Subject:** Community Opposition to PGE's "Harborton Reliability Project"

To whom it concerns,

We, the undersigned community members and organizations, are writing to express our opposition to Portland General Electric's (PGE) proposed Harborton Reliability Project. We are not convinced that the project is necessary for reliable residential electricity delivery and have deep concerns about the project's ecological and economic impacts to the greater Portland area. As community organizations dedicated to economic and environmental justice as well as wildlife conservation, we believe that elected officials must follow the Forest Park Natural Resources Management Plan (FPNRMP), prioritize preserving ancient forests that serve as vital ecosystems, and safe-guard consumers from unnecessary utility bill increases.

To be clear, our organizations recognize the need for and support upgrades and maintenance to the electrical grid, including transmission line development required for reliable electricity and to support the transition from fossil fuels to clean energy. In this case, PGE has failed to demonstrate how the Harborton Reliability Project will provide broad-scale benefits to ratepayers beyond a small subset of high-demand commercial users. PGE has not been clear or consistent about the project timeline and impact, and the utility company has not conducted adequate public outreach and engagement.

In the past few years, PGE has repeatedly raised energy costs for ratepayers to pay for infrastructure supporting new large tech industry facilities that offer little benefit to Oregon communities. We are concerned that the Harborton Reliability Project will support transmission

for data centers and similar high-demand industrial customers instead of true residential reliability and grid decarbonization. We are not alone in our skepticism about the utility's investments - in November, U.S. Senator Ron Wyden submitted a letter interrogating Portland General Electric's significant investments into infrastructure to support large industrial users such as data centers while everyday consumer costs continue to increase.<sup>1</sup>

Our organizations are united in our goals of protecting ancient forests and safeguarding the pocketbooks of Oregon families while transitioning to renewable energy for residents of the Willamette Valley. There must be an extremely high bar for any project that leads to significant deforestation of mature trees that sequester carbon, provide habitat to sensitive species, and keep urban areas cool during extreme heat. PGE has not adequately demonstrated that cutting trees in Forest Park is necessary to serve the very modest load growth expected from residential customers in the region. As such, we cannot support the Harborton Reliability Project as currently proposed.

### ***Ecological Impacts & Conflicts with Forest Park Natural Resources Management Plan***

The Harborton Reliability Project is focused on the upgrade and expansion of electric transmission infrastructure in the North Unit of Forest Park, and the utility is proposing five acres of logging ("selective tree removal" in their terms) within the park near existing power lines. This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands.<sup>2</sup> The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern, as well as many other special-status species that depend on this ecosystem for survival.<sup>3</sup> Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in existing clearcuts, which poses a threat to the local ecology and increases wildfire risk. Any time mature trees are removed, carbon sequestration is lost and forest vulnerability to high wind, ice, and wildfire increases. It is deeply concerning that future phases of this project may impact an additional 15 acres of Forest Park to the northwest and west, potentially disrupting salmon habitat in the Miller Creek watershed.

The Portland Bureau of Development Services (BDS) already deemed the utility's previous application incomplete earlier this year in part due to its ecological impacts, and listed a number

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<sup>1</sup> Alex Baumhardt, *Sen. Wyden calls on Oregon's largest electric utility to detail true drivers of massive rate hikes*, (Oregon Capital Chronicle, November 25, 2024).  
<https://oregoncapitalchronicle.com/2024/11/25/sen-wyden-calls-on-states-largest-electric-utility-to-detail-true-drivers-of-massive-rate-hikes/>

<sup>2</sup> Forest Park Conservancy, *Statement Regarding PGE's Work Proposal Affecting Forest Park* (April 2024),  
<https://forestparkconservancy.org/statement-regarding-pges-work-proposal-affecting-forest-park/>

<sup>3</sup> Oregon Conservation Strategy, *Northern Red-Legged Frog*,  
<https://oregonconservationstrategy.com/strategy-species/northern-red-legged-frog/>.

of significant barriers to approval in its response to PGE.<sup>4</sup> The Bureau expressed doubt that the proposed actions were in line with FPNRMP Goals and Strategies, which per City rules must be met before permit approval. Specifically, the Bureau voiced skepticism that the project could be brought into alignment of Conservation Goal #1 of the FPNRMP,<sup>5</sup> which is focused on preserving the ecology of the area to “grow an ancient forest for the benefit and enjoyment of future generations,” and cited the project’s significant impacts including cutting of over 300 trees, disturbing soil and ground covers, impacting riparian zones, and broadly altering ecosystem functions.<sup>6</sup> Simply put, you cannot grow an ancient forest by cutting mature trees.

PGE proposes to mitigate the projects’ ecological impacts, but that plan fails to comply with the FPNRMP’s rule to stage mitigation activities within the impacted management unit. The mitigation plan does not account for the harm to mature, undisturbed forest or the loss of that forest’s carbon sequestration benefits, which would take at least 80 years to recover through replanting efforts. It is also important to note that, based on a report prepared by Toth and Associates for PGE, there are multiple viable alternatives to siting this project within Forest Park.<sup>7</sup> In fact, the report identifies two alternatives that are “feasible for further discussion,” Alternatives 4 & 8, both of which would completely avoid impacts to the ecology of Forest Park. PGE has not adequately justified why they are not pursuing these alternatives.

### ***Economic Concerns & Failure to Demonstrate Public Benefit***

In addition to the environmental impacts of this phase of the project, we have significant concerns about the economic impacts on PGE ratepayers – Oregon families from Portland to Salem and between. Specifically, we are concerned about residential ratepayers footing the bill for a project that seemingly provides little benefit to residential households or the climate, and seeing rate increases to pay for infrastructure that would benefit large industrial customers in Washington County. And while the intentions and impacts of the final two phases of the Harborton Reliability Project have not yet been made public, there has been significant public speculation that the power line proposal through Forest Park is explicitly tied to increasing transmission capacity for Intel’s multi-billion dollar expansion plans and the growing number of data centers sited in Hillsboro, and later phases could require even more infrastructure.<sup>8</sup> Without

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<sup>4</sup> Forest Park Conservancy, *PGE’s Harborton Reliability Project Proposal Deemed “Incomplete” by the City* (June, 2024).

[https://forestparkconservancy.org/wp-content/uploads/2023/05/LU-24-041109-CU-EN-GW\\_Incomplete-Letter.pdf](https://forestparkconservancy.org/wp-content/uploads/2023/05/LU-24-041109-CU-EN-GW_Incomplete-Letter.pdf)

<sup>5</sup> City of Portland, *Forest Park Natural Resources Management Plan*, (March 10, 1995)

<https://www.portland.gov/parks/documents/forest-park-natural-resources-management-plan/download>.

<sup>6</sup> Forest Park Conservancy, *supra* note 3.

<sup>7</sup> Toth and Associates, *Harborton 230kV Alternatives Analysis for Portland General Electric* (October 24, 2022)

<https://drive.google.com/file/d/170c41B9Js17dOxP3fnYlnyQPVfuUCh40/view?usp=sharing>.

<sup>8</sup> Mike Rogoway, *Oregon’s Data Centers Want a Lot More Electricity. Who’s Going to Pay? It Could be You* (Oregonian, October 25, 2024).

<https://www.oregonlive.com/silicon-forest/2024/10/oregons-data-centers-want-a-lot-more-electricity-whos-going-to-pay-it-could-be-you.html>.

transparency behind future plans, we cannot ensure that the benefits of this project are directed towards residential and commercial ratepayers, or that environmental degradation will stop at only five acres of tree removals in Forest Park.

Based on current trends, it is clearly apparent that the utility is focused on expanding transmission and energy generation infrastructure in response to the rapidly increasing demand of large industrial facilities, and specifically the technology industry. According to PGE's schedule for load growth change, residential demand is projected to increase by only 3.5% between 2016-2025. Heavy industrial demand, on the other hand, has a projected increase of almost 150%.<sup>9</sup> Roughly 70% of transmission upgrade dollars from 2020-2024 were spent, or are planned to be spent, in the Hillsboro area in an effort to meet increased load associated with the growth of data centers and other large industrial users.<sup>10</sup>

**Figure 8: Load Growth (MWh) change 2016 - 2025 by PGE schedule<sup>155</sup>**

<b>Schedule</b>	<b>2016</b>	<b>2025</b>	<b>percent change</b>
Residential (sch. 7)	7,620,805	7,889,185	3.5%
Small Commercial (sch. 32)	1,599,950	1,550,351	-3.1%
Medium Commercial (sch. 83)	2,795,179	2,867,544	2.6%
Large Commercial (sch. 85)	3,177,726	2,748,209	-13.5%
Large Industrial (sch 89)	934,442	1,057,275	13.1%
Really Large Industrial (sch 90)	1,498,007	3,685,313	<b>146.0%</b>
<b>Total COS System</b>	<b>17,842,764</b>	<b>19,958,040</b>	<b>11.9%</b>

*Load growth between 2016 and 2025 has been overwhelmingly driven by increased demand of Really Large Industrial facilities<sup>11</sup>*

Seventy percent of PGE's industrial sector demand comes from data centers and semiconductor manufacturing.<sup>12</sup> Data centers already account for 11% of Oregon's energy consumption, over

<sup>9</sup> Oregon Public Utilities Commission, *In the Matter of Portland General Electric Company Request for a General Rate Revision: Opening Brief of the Oregon Citizens' Utility Board* (PUC Docket No. UE 435, October 2024) <https://edocs.puc.state.or.us/efdocs/HBC/ue435hbc332448025.pdf>.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> Zachary Skidmore, *PGE reports significant increase in industrial demand driven by semiconductor and data center sectors* (Data Center Dynamics, October 31, 2024).

twice as much as all of the homes in Portland, and regional energy forecasters project data power consumption to triple or quadruple by the end of the decade.<sup>13</sup> Across the state, electric bills are set to increase by over 50% in a two-year period.<sup>14</sup> This project comes amidst a broader trend in which residential ratepayers are being left to foot the bill for the significant expansions of energy infrastructure needed to power the tech sector boom in Oregon, while seeing little benefit to communities.

In light of the significant costs that ratepayers are already facing, and the utility's continued prioritization of large industrial users over residential customers, we are extremely concerned about this proposal. Until the utility provides the community clear and consistent information on its long-term plans for the entire Harborton Reliability Project, demonstrates a clear benefit to residential and commercial customers, and ensures that this project will not unnecessarily increase energy bills for PGE customers, we cannot support the project, especially in light of severe ecological impacts that run counter to established City policy in the FPNRMP.

### ***Need for Greater Community Outreach and Engagement***

As Portland works to strengthen energy reliability and support electrification and decarbonization, inclusive community engagement will be essential to ensure that these investments are made without sacrificing key community values. We believe the City of Portland and PGE have an opportunity to establish a clear precedent along these lines by prioritizing deep community participation in this and any future proposal to increase transmission capacity. Currently, the utility has only offered two in-person public outreach events, both scheduled *after* the utility had already submitted its initial application to the City of Portland.<sup>15</sup> This kind of reverse-engineered outreach, in which PGE only considers community voices after key decisions have been made, only serves to further alienate Oregon residents who are on the hook to pay for new transmission projects.

### ***Conclusion***

The undersigned organizations recognize the need for the expansion of transmission infrastructure to support reliability and the transition from fossil fuels to clean renewable electricity. We are unable to support the Harborton Reliability Project as currently proposed due to significant concerns over environmental and economic impacts, and a failure on the part of the

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<https://www.datacenterdynamics.com/en/news/pge-reports-significant-increase-in-industrial-demand-driven-by-semiconductor-and-data-center-sectors/#:~:text=As%20a%20result%2C%20PGE%20increased.2030%20than%20projected%20last%20spring>.

<sup>13</sup> Rogoway, *supra* note 6.

<sup>14</sup> Gosia Wozniacka, *5 takeaways: Why are Oregon power rates going up so fast?* (Oregonian, March 10, 2024) <https://www.oregonlive.com/environment/2024/03/5-takeaways-why-are-oregon-power-rates-going-up-so-fast.html>.

<sup>15</sup> Portland General Electric Company, *Harborton Reliability Project Information Resources*, <https://portlandgeneralprojects.com/projects/harborton-reliability-project/>.



utility to justify its need or meaningfully engage with key stakeholders on the project development. We believe that this project can offer us an opportunity to collaborate on a deeper level about what the energy transition looks like in Portland and Oregon more broadly, as well as to establish a strong precedent moving forward for responsible project development and siting. Additionally, the project highlights a growing need to confront the significant impacts that the rapidly expanding technology sector is having on our energy infrastructure and our ability to meet our climate goals.

In light of this information, we oppose the Harborton Reliability Project as proposed, and request that lawmakers work with our organizations and the utility to establish a more comprehensive, transparent, and collaborative process to address the needs that this project is purported to fulfill. In the meantime, we urge the City of Portland to reject PGE's land use application for this project.

Thank you for your consideration.

Signed,

Vinay Prasad, Board Chair, Forest Park Conservancy

Damon Motz-Storey, Oregon Chapter Director, Sierra Club

Micah Meskel, Assistant Director of Urban Conservation, Bird Alliance of Oregon

Brenna Bell, Forest Climate Manager, 350PDX

Steering Committee, Democratic Socialists of America, Portland Chapter

Eve Goldman, Staff Attorney, Tualatin Riverkeepers

Lindsey Zehel, Executive Director, Defend Them All

Faun Hosey, President, Save Helvetia

Eloise Navarro, Organizing Director, Mosquito Fleet PDX

**From:** [Caruso, Christine](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FW: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:55:08 AM

---

**Christine Caruso** (she/her)

Senior Planner, MArch

Title 33 - Land Use Services Division

Portland Permitting & Development - City of Portland

503-865-6420 (cell)

[Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov)

Work Hours: Monday thru Thursday 7:00 am to 4:30 pm; Friday 7:00 am to 3:30 pm with flex day off

---

**From:** Vinay Prasad <vinay816@gmail.com>  
**Sent:** Monday, December 2, 2024 9:05 PM  
**To:** Steele, Morgan <Morgan.Steele@portlandoregon.gov>  
**Subject:** Re:LU 24-041109 CU EN GW

Re: Case File LU 24-041109 CU EN CW| PGE Harborton Proposal

Dear Ms. Steele and Ms. Caruso:

This response to PGE's land-use application to conduct utility development activities within Forest Park is submitted by the Forest Park Conservancy (FPC). The mission of this non-profit organization is to protect the ecological health of Forest Park while encouraging responsible recreation and access to the park. It is our position that the City of Portland must deny this application as it violates multiple criteria of Title 33, Portland Zoning Code, thus violating city policy. The proposal does not meet the approval criteria required for exceptions.

**REMOVING AND DISRUPTING A SIGNIFICANT AMOUNT OF WOODY**

**VEGETATION:** Based on PGE's application, over 4.7 acres of pristine forest land would be removed or highly disrupted through logging activities which would remove over 300 living trees many over 150 years old. Additionally, this project would permanently fill two wetlands and significantly disrupt two streams.

This section of Forest Park is steep and will be prone to erosion from the building of logging roads and vegetation removal, potentially violating the Bureau of Environmental Services's wet erosion control standards.

**ALTERNATIVE LOCATION POTENTIAL EXISTS INSIDE FOREST PARK:** In public

and private meetings, PGE was repeatedly asked if they have pursued a collaboration with Bonneville Power Administration to piggyback on their existing infrastructure and easement in Forest Park, which runs parallel to PGE's easement and the area being proposed for logging. PGE has not responded to this request for information. Therefore, we believe it is an unexplored alternative that must be considered and addressed.

**ALTERNATIVE LOCATIONS EXIST OUTSIDE OF FOREST PARK:** Based on the report prepared for PGE by Toth and Associates, which was delivered to PGE in April 2022, there appear to be at least two viable alternatives to running the power lines through Forest Park that have not been fully vetted. PGE did not release the Toth report to city agencies or to the public until last month. City agencies and FPC have repeatedly requested to engage with PGE on their future expansion over the last decade, and yet no details were forthcoming until their Harborton Reliability Project application was filed with the city. The Toth report details alternative routes labeled as Alternatives 4 and 8 which run entirely outside of Forest Park. PGE does not dispute that these are potentially viable alternatives. PGE argues that these alternatives are more "expensive" and would take longer to execute, not that they are not viable.

FPC encourages the city to compare this additional expense on PGE's part to the value of what would be lost to the public if the route through Forest Park is permitted, removing pristine complex forest lands, destroying wildlife habitat, and disrupting wildlife corridors – lands that have officially been protected by the City of Portland since its establishment in 1948.

Additionally, this proposed plan would go against Forest Park Natural Resource Management Plan (FPNRMP), implemented in 1995. As some alternatives do not run within Forest Park, and thus do not conflict with the FPNRMP, we strongly believe the proposed plan should be denied on these grounds alone, let alone the other issues with PGE's proposed project.

**PGE PROJECT PHASES 4 AND 5 TO IMPACT ANOTHER 15 ACRES WITHIN FOREST PARK – ALTERNATIVES TO THESE PHASES NOT EXPLORED NOR ENVIRONMENTAL IMPACT EVALUATED:** PGE staff stated in a public meeting held in October that Phases 4 and 5 of this project will impact an additional 15 acres of similar high-quality forested land in the North unit of Forest Park. Because the combined ecological impact of phases 3, 4, and 5 would be far more significant than phase 3 alone, it is FPC's position that the City of Portland must require PGE to produce their proposal to execute phases 4 and 5 of this project. Logic follows that if alternative lines for Phase 3 were built outside of the park, Phases 4 and 5 could also be constructed outside of the park. PGE will no doubt put forward the same arguments that it is 'less costly' and faster to execute Phase 4 and 5 in Forest Park if Phase 3 is permitted, but that is not sufficient cause to pursue plans that would degrade Forest Park.

**APPROVAL OF PHASE 3 WILL SET A PRECEDENT THAT THE CITY WILL NOT CONTINUE TO PROTECT FOREST PARK FROM DEVELOPMENT:** Should the City

permit Phase 3 to occur within Forest Park, FPC is concerned that this sets a precedent and that the City of Portland will no longer uphold their policy to protect Forest Park for the people of the city and for our region's ecological health. Given that future phases may impact an additional 15 acres of trees in Forest Park, setting this precedent may lay the groundwork for PGE to pursue "easier" and "less costly" plans in Forest Park for these phases rather than doing their due diligence in exploring alternatives.

**ADDITIONAL APPROVAL CRITERIA REQUIRES PROTECTION OF WILDLIFE HABITAT INCLUDING THAT OF RED-LEGGED FROGS:** In addition to the removal of 4.7 acres of trees, which serve as crucial habitat to wildlife, this proposed project would also permanently fill two wetlands and significantly disrupt two streams that currently support wetland, riparian, and aquatic life. As stated in the City's FPNRMP, "Above all, wildlife habitat in the North Unit should be protected...Special attention should be given to development which may threaten wildlife migration in and out of the North Unit." PGE's proposed cut is located at the edge of this upland habitat. Phases 4 and 5 are also targeted for the North Unit, and as mentioned above would entail another 15 acres of impact.

As documented in the City of Portland's 2012 *Forest Park Wildlife Report*, the northern area of Forest Park is home to over 200 species of interest, either listed, candidate, sensitive or of concern at the state and federal level. It is rich in wildlife structural diversity including larger trees, standing snags, and native understory. One of the streams that, per PGE's plan, would be cut and crisscrossed with logging equipment is habitat for the northern red-legged frog, an at-risk species as noted in the Special Status and At-Risk Species List prepared by the City of Portland in 2022.

Additionally, the ecological impact on the protected area of Forest Park would not be restricted to the area targeted for clear-cut. The edges of this pristine coniferous forest would be susceptible to plant invasions (ivy, blackberry, garlic mustard, and others) that degrade forest health and limit the diversity of species supported by the park, tree blow-down from storms, landslides, temperature increases which can weaken the forest making trees susceptible to insect and disease invasions. The slopes in this area of the park are also extremely steep, as documented in the Toth report, making this landscape prone to landslides when vegetation is removed.

**ADDITIONAL APPROVAL CRITERIA REQUIRES SCENIC, RECREATIONAL, AND OPEN SPACE VALUES OF FOREST PARK TO NOT BE DIMINISHED AS A RESULT OF DEVELOPMENT ACTIVITY:** The area of forest removal in the proposed Phase 3 would be visible from Highway 30 with 150+ year old trees removed or topped. Likely scenic and recreational values of Forest Park will also be significantly diminished further as a result of Phases 4 and 5.

**ADDITIONAL APPROVAL CRITERIA - PROTECT MILLER CREEK SUBAREA WHICH IS TARGETED WITH PHASES 4 AND 5:** According to the Approval Criteria for Environmental Review within the Forest Park subdistrict: 'Within the Miller Creek Subarea, development activities (MUST) not degrade natural water quality, quantity

and seasonable flow conditions, and (MAY) not increase water temperatures above 68° F. Development activities (MUST) not decrease opportunities for fish and amphibian passage. Based on these criteria, FPC's position is that the City must not approve Phase 3 with the knowledge that Phases 4 and 5 may have impacts on this subarea. While no concrete details on these phases have been provided to the city, nor to FPC, the fact that these future phases would likely be building off of Phase 3 we must take these potential future impacts into account when assessing Phase 3. Without these details, we must assume that the environmental impact will be similar to the execution of Phase 3, thereby disrupting wildlife habitat in an additional 15 acres of high-quality upland forest habitat, wetlands, and salmon-bearing streams.

**MITIGATION CRITERIA IS NOT MET:** FPC's position is that PGE's mitigation plans do not reduce or mitigate loss within Forest Park. In fact, there is no room within the North Unit to mitigate loss. Mitigation plans included in PGE's revised proposal do not come close to mitigating the loss of ecosystem functions (air filtration, temperature regulation, water infiltration, hillside stability, wildlife habitat, aesthetics, recreation, and carbon storage in vegetation and soils) currently provided by this forest. This loss would likely be irreplaceable within several human lifetimes, and may not be replaceable at all given that climate change impacts may limit the reestablishment of similar upland forested ecosystems in this region. The area of impact may be too large and complex to fully mitigate the loss within the mitigation standards required by the FPNRMP. If this project expands to an additional 15 acres within Forest Park, as future phases may call for, it is a certainty that this mitigation becomes even less achievable.

**PGE LACKS TRANSPARENCY IN PLANNING WHICH MAY HARM COMMUNITY RESILIENCE:** PGE's failure to be fully transparent about their plans for expanding transmission lines, withholding the Toth report, and their failure to amend their application based on public input over the past few months raises red flags about the utility's interest in community resilience. We believe this project shines a light on the need for PGE to engage with key stakeholders and the public about energy transition in the future. FPC urges the City of Portland to deny this application and require PGE to sit down with key stakeholders and the public to engage in future planning that does not violate city policy.

Sincerely, on behalf of Forest Park Conservancy and its board of directors,

-Vinay Prasad, Board President



**From:** [Ki \[Logan\] Ridenour-Starnes](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Don't Perpetuate Climate Disaster and Inequality: Deny the Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 2:40:26 PM

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Osiyo (Hello),

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion!

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

It would also continue the colonial practices of destroying unceded indigenous lands for profit. **We are already facing unmitigated climate shifts and this will contribute to local climate instability.**

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration and for stewarding the Land and all the kin residing on it.

Wadv (thank you),  
Logan Ridenour-Starnes

**From:** [Timothy O'Brien](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please save our Parks  
**Date:** Wednesday, December 4, 2024 2:41:16 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Tim

**From:** [Rain Estrada](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Urge to deny land use for powerline  
**Date:** Wednesday, December 4, 2024 2:42:15 PM

---

Good Afternoon,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you,  
Rain Estrada, LPC

--

Rain Estrada, LPC (she/they)  
phone: 503-476-1068  
fax: (877) 341-0803  
[www.daylight-counseling.com](http://www.daylight-counseling.com)



**From:** [Anis Mojgani](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** No to PGE's Destruction of Forest Park  
**Date:** Wednesday, December 4, 2024 2:46:01 PM

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Hello

Portland General Electric (PGE) is seeking to expand powerlines in Forest Park for the Harborton Reliability Project; I urge Portland Permitting and Development to deny the land use permit PGE requires to do this in Forest Park.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely,  
Anis Mojgani  
Portland resident and Oregon Poet Laureate Emeritus

**From:** [Melody Andrews](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** Save Forest park  
**Date:** Wednesday, December 4, 2024 2:47:28 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Personal note: Forest park has been a haven to me and many other locals. It has been a space for us to enjoy for ourselves and a place we have shared with people visiting our city. Visitors find the same love and wonder for the park as we locals do.

It is so important to protect and respect this place and all the creatures and plants that thrive inside of its boundaries.

A place close to the city that is easily accessible to all and yet has remained untouched by modern infrastructure, forest park has a spirit all its own that is powerful to experience. I personally ask for myself, other locals, visitors who are lucky to experience it, future generations, and the flora and fauna, to keep forest park as is and to deny PGE’s project proposal.

Thank you.  
Melody Andrews  
Local small business  
North tabor resident

**From:** [Kattie Gardner](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Comment on Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 2:49:29 PM

---

Good afternoon-

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland-area residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best regards,  
Katherine Gardner

**From:** [Selena Hampton](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Portland mother  
**Date:** Wednesday, December 4, 2024 2:59:41 PM

---

Good afternoon,

My name is Selena Hampton and I have lived in Oregon all my life. Forrest park is the first place I brought my son out of the house after he was born. I, just like most portland residents love forest park, and our outdoors in general. I am outraged to hear that PGE wants to clearcut over 20 acres in forest park.

PGE is not a company I would trust with our wildlife as their history with lobbying and pushing back renewable energy has proven that they care about lining their pockets than the lives of those who use their services.

Here is a link from [ewg.org](https://www.ewg.org) detailing some of PGEs lobbying and going against Solar panels

<https://www.ewg.org/research/power-and-profit-how-pge-fails-california-ratepayers-and-what-do-about-it>

Bellow are photos of me and my son when he was a newborn at forest park.

We love this place! Don't let them destroy our beautiful park!

Signed,  
Selena Hampton

**From:** [Tamar Dvir](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Citizen Concerned About PGE Project's Impact on Forest Park  
**Date:** Wednesday, December 4, 2024 3:13:18 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration.  
Tamar Dvir

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**From:** [kbstoakley](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Please Deny PGE's Land Use Permit for the Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 3:15:56 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project.

While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE's land use permit.

Thank you for your consideration.  
Kim Stoakley  
NE Portland Resident, 97211 Zip Code

**From:** [Rita Webb](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment: AGAINST PGE Clear Cutting Forest Park  
**Date:** Wednesday, December 4, 2024 3:16:47 PM

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Hello ~ I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. **Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.** Thank you for your consideration. Rita Webb, NE Portland (Cully) Resident

**From:** [Kim Gumbel](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Wednesday, December 4, 2024 3:16:54 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Kim Gumbel  
97219



**From:** [Andrew Lawrence](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project Public Comment  
**Date:** Wednesday, December 4, 2024 3:29:20 PM

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Dear City Council:

As someone who has lived in the Portland metro area for over 30 years, I am vehemently opposed to the proposed PGE plan to clearcut sections of Forest Park.

Currently, Forest Park serves as a respite of nature for all of Portland's citizens and beyond. Approving the further deforestation of our land would mean decimating a resource which currently provides sustainable benefit for many, in order to garner short term gains for a few.

If approved, this proposal would be a great loss to our city, as well as a strong indicator that our elected officials no longer represent the needs of the people, but rather, the desires of the few.

As a Portland native, I cannot think of a more anti-Portland act than permanently destroying nature in order to oblige those who cannot be satisfied. Please leave the Park to those of us who may benefit from its beauty.

Please refuse PGE's land use permit. Thank you for your attention and consideration.

Sincerely,

Andrew F. Lawrence

**From:** [Hannah Withers](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public Comment on Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 3:32:11 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Hannah Withers, 97206

**From:** [Paul Majkut](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Re: comments on PGE Harborton project LU 24-01109 CU EN GW  
**Date:** Wednesday, December 4, 2024 3:48:23 PM

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Pursuant to the November 4, 2024 notice from Portland Permitting and Planning, I am making these additional comments with respect to Case File LU 24-041109 CU EN GW, PGE's proposal to install high-voltage powerlines in the North Unit of Forest Park.

Thank you for your consideration of these additional Comments.

In its Revised Application, PGE Harborton Reliability Project, dated 10/28/24, App C, at 16, PGE states:

"PGE commissioned a study to look at how a route that avoids some of the impacts to Forest Park could be established along NW Marina Way north of the City of Portland city limits. PGE went so far as to query landowners about their willingness to grant new easement for a new transmission line along NW Marina Way. Responses received by PGE's Property Rights Group indicated strong community opposition to required tower construction through this area for this alternative, which would seriously delay the needed improvements."

PGE should be required to produce the new study, queries and responses so they can be evaluated by the City. Although the Toth Report stated condemnation could be avoided as I pointed out in my prior comments, even if condemnation is required, PGE could seek immediate possession of the expanded ROW in its OPUC proceedings to shorten the time required to build the NW Marina Way route and help avoid the "violation of federal reliability standards."

PGE also states:

"Moving forward with this alternative would likely require PGE to condemn property, which would require PGE to seek a Certificate of Convenience and Necessity (CPCN) from OPUC. Obtaining a CPCN involves submission of an extensive filing and then the OPUC must conduct its own investigation to determine the necessity, safety, practicability, and public interest justification for the proposed transmission line. In the CPCN proceeding, PGE would need to show that the route is practicable and feasible, that the project benefits the public, and that the costs justify the project."

PGE could cite as justification for the NW Marina Way route: 1-avoidance of adverse impacts to Forest Park, thereby meeting Conservation Goal 1 cited in my prior comments, 2-PGE's inability to mitigate project impacts on Forest Park in the North Management Unit as required by the Plan, 3-avoiding the clearcutting of 15 more acres of Forest Park in Phases 4 and 5, and 4-avoiding the costs of constructing Phases 4 and 5 in the Park. These considerations could increase "the likelihood OPUC would approve issuing a CPCN."

Please do not hesitate to reach out to me should you have any questions about my Comments.

Sincerely,

Paul Majkut

On Mon, Nov 18, 2024 at 9:15 AM Paul Majkut <[paulsmajkut@gmail.com](mailto:paulsmajkut@gmail.com)> wrote:

Pursuant to the November 4, 2024 notice from Portland Permitting and Planning, I have attached my comments with respect to Case File LU 24-041109 CU EN GW, PGE's proposal to install high-voltage powerlines in the North Unit of Forest Park.

Thank you for your consideration of these Comments. Please do not hesitate to reach out to me should you have any questions about my Comments.

Sincerely,

Paul Majkut

**From:** [megan ogle](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest park PGE project concerns  
**Date:** Wednesday, December 4, 2024 3:51:28 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Megan Ogle  
Montavilla homeowner  
Regular user of Forest Park

[Sent from Yahoo Mail for iPhone](#)

**From:** [Kristine Xu](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defending Forest Park  
**Date:** Wednesday, December 4, 2024 4:18:08 PM

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Hello,

My name is Kristine and I live in SE Portland. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Kristine S. Xu  
[408-472-9966](tel:408-472-9966) | [linkedin.com/in/kristinexu](https://www.linkedin.com/in/kristinexu)

**From:** [Alicia Gamble](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment regarding Forest Park clearcutting by PGE: Please don't  
**Date:** Wednesday, December 4, 2024 4:19:26 PM

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Dear Morgan & Christine:

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

I am a Portland resident. I used to live near Forest Park and ride my bike there several times a week. It was a special place for me to connect with nature and heal from trauma and a broken heart. Not many cities have such a large park where you can actually feel surrounded by nature from such large and dense woods. For me, this is why i live in the PNW. The trees in Forest Park have so much more value than we can't put a price tag on. These trees help reduce carbon dioxide emissions that lead to climate change. They provide homes and sustenance for wildlife and help fungal growth. Even the dead trees (snags) are incredibly important for the ecosystem. Only certain species of birds will nest in snags. The least we can do is just leave the trees there and let them live. Bare minimum. PGE has been nothing but harmful to our trees, as they refuse to put their powerlines underground to help keep Portlanders safe from winter storms. Let's speak for the trees and not companies that put profits before people (and all other living beings).

Sincerely,  
Al Gamble





**From:** [K.Y](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Oppose Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 4:19:58 PM

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I strongly urge you to deny the land use permit being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. This is an unnecessary use of public land that is treasured by Portland and sets a negative precedent.

As we know, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents like myself and my family.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. The point of having resource management plans is so we can make smart, public values-oriented choices when corporations try to buy their way to meet their own goals, which are not in the public interest no matter how their marketing department phrases it.

PGE’s power line expansion would not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, groups have looked at PGE’s data and discovered that the vast majority of increased demand is coming from these tech facilities. They need to find another solution.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.  
Kyla Yeoman  
3020 NE 29th Ave  
Portland, OR 97212

**From:** [Angela Hudson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park - Public Comment  
**Date:** Wednesday, December 4, 2024 4:20:45 PM

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Hi there,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Forest Park is one of Portland's greatest gems in the city, and I've heard from multiple people who have moved here that it was a huge draw in their decision to move to Portland. Please refuse PGE's land use permit, so we can preserve Forest Park for future generations.

Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Angela Hudson (Sellwood / Westmoreland Resident)  
503-453-2989

**From:** [Carolyn Supinka](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny PGE's land use permit for Forest Park  
**Date:** Wednesday, December 4, 2024 4:26:21 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Carolyn Supinka, Portland resident

**From:** [Tracey Franco](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment against PGE land use permit  
**Date:** Wednesday, December 4, 2024 4:28:57 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit, and please prioritize the preservation of our diverse and unique ecosystem. The land and inhabitants of Forest Park, and the values of Portland citizens should be prioritized over corporate interests.

Thank you for your consideration.

Tracey Franco  
North Portland resident and  
PSU Undergraduate Student

**From:** [Jack Carlson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Comment on PGE Plan  
**Date:** Wednesday, December 4, 2024 4:38:35 PM

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Morgan and Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

I am a resident of N Portland and would be devastated to see our land and eco system destroyed when there are OTHER ROUTES AVAILABLE.

-Jack Carlson

**From:** [Kaia Austin](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE comment  
**Date:** Wednesday, December 4, 2024 4:43:34 PM

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Hello,

My name is Kaia and I'm a Portland resident.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Kaitlin Carpenter](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** In support of protecting Forest Park  
**Date:** Wednesday, December 4, 2024 4:46:56 PM

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I am writing to urge Portland Permitting and Development to DENY the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Kaitlin

...

Kaitlin Carpenter

**From:** [cira](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** FOREST PARK PUBLIC COMMENT  
**Date:** Wednesday, December 4, 2024 4:50:00 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

The park has meant so much to me in my life, from growing up in the area and finding out about its hidden treasures just after receiving my drivers license, to falling in love with someone whilst taking them on my favorite hike, to finding sanity through the pandemic/lockdown era and finding new, quieter trails further in from the more popular routes I had already been traipsing for years. This is a place we all deserve to have access to and not lose any acre from—its a mental health issue, an environmental issue, and an aesthetic issue. Keep Portland as wild as possible. Not to mention, fuck Intel for supporting Israel in their pursuit of the continued genocide of Palestinians.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Warmly,  
Cira Hamlin



**From:** [Karolinn Fiscoletti](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment on PGE's Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 4:52:48 PM

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Morgan and Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Karolinn Fiscoletti

**From:** [Spencer Thayer](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#); [pgeprojects@pgn.com](mailto:pgeprojects@pgn.com)  
**Cc:** [Tran, Michelle](#); [Furuto, Joey](#); [Booker, Tonya](#); [Long, Adena](#); [Lofgren, Todd](#); [Espinoza, Leah](#); [Horner, Brett](#); [Arendes, Carine](#); [Yoss, Chris](#); [Richard Higgins](#); [stacy.borke@multco.us](mailto:stacy.borke@multco.us)  
**Subject:** URGENT: Stop PGE's Corporate Land Grab and Forest Destruction in North Portland, Public Comment  
**Date:** Wednesday, December 4, 2024 4:53:46 PM

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I am writing to strongly oppose PGE's land use permit application for the Harborton Reliability Project, which represents yet another assault on our community spaces by corporate interests seeking to expand their power and profits at our expense.

The impact on St. Johns residents would be particularly devastating. This project would permanently scar the viewshed of Forest Park that countless families have built their lives around, significantly reducing property values for working people who have invested their life savings in homes facing the park. Once again, a corporation seeks to privatize profits while socializing the losses onto our communities.

The truth behind this project is stark: PGE aims to expand transmission capacity primarily to serve massive tech industry expansion in Washington County, while forcing Portland residents to bear both the environmental and financial costs. Their own data reveals that residential demand is projected to increase by only 3.5% through 2025, while industrial demand is set to surge by 150%. This is not about serving community needs - it's about subsidizing corporate growth at our expense.

The project would destroy irreplaceable ecosystem connections, clear-cutting 4.7 acres of 150+ year old forest and threatening future expansion of 15 more acres. The Harborton wetlands provide critical habitat for the northern red-legged frog, an indicator species whose presence reflects the health of our entire ecosystem. PGE's claims about adequate mitigation ring hollow - the City of Portland itself has stated that their proposed restoration would take at least 80 years to mature and would fail to mitigate the long-term impacts.

PGE has consistently demonstrated bad faith in this process by:

- Withholding crucial reports from public view
- Failing to seriously explore alternatives like cooperation with existing BPA infrastructure
- Misrepresenting the true beneficiaries of this expansion
- Pushing rate increases onto residential customers while subsidizing industrial users

This project violates both the letter and spirit of the Forest Park Natural Resources Management Plan. The removal of 376 living trees, including ancient white oaks up to 500 years old, and the destruction of vital wetlands cannot be justified when viable alternatives exist.

Our public spaces, ecological heritage, and community wellbeing should not be sacrificed for corporate profit. The residents of St. Johns and all Portlanders deserve better than to have their homes devalued and their beloved forest views destroyed to serve tech industry expansion. I urge you to reject this permit application and require PGE to pursue alternatives that don't destroy irreplaceable public forest land.

Sincerely,

Spencer Thayer  
Saint Johns, Portland Oregon Resident  
[me@spencerthayer.com](mailto:me@spencerthayer.com)  
+13127256661

**From:** [Lucky George](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Don't allow PGE to clear cut in Forest Park  
**Date:** Wednesday, December 4, 2024 4:55:37 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clear-cutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

Forest Park is a part of what makes Portland a special place to live. Time spent in nature is an incredibly important part of my mental health care, and having such a large section of forest so close to the city makes nature accessible to me on the days I can barely get out of bed, let alone plan a hike. Beyond my own personal connection to Forest Park, it's my deeply held belief that for humanity to survive as the climate changes, we will have to stop acting like our wants and needs are above the wants and needs of any other living thing in nature. We will have to learn to share this planet we live on because without entire ecosystems of plant, animal, and insect life we would not survive. And the first step is to stop development that destroys already dwindling habitats for other living things. We simply have to do without new development in order to responsibly share this planets resources. After all, we've gotten on just fine without this powerline expansion up till now, do we really need more than what we have?

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Lucky George, Portland resident

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-Lucky (he/they)

**From:** [Paige Raina Davis](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please, Defend Forest Park  
**Date:** Wednesday, December 4, 2024 4:55:44 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Frogs are a crucial part of the ecosystem, many considering them to be the canary in the coalmine -- the future does not look bright when frogs and amphibians begin to decline.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit.

Thank you for your consideration.  
Paige Davis

**From:** [Carol Chesarek](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment for LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 4:59:10 PM  
**Attachments:** [FPNA Response to PGE LU 24-041109 120424.docx](#)  
[PGE 230kV Transmission Line Diagrams 120324.docx](#)

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Morgan and Christine,

Here is Forest Park Neighborhood's initial response to this application. We expect to submit additional materials later.

Thank you!

Carol Chesarek  
Co-Chair, Forest Park Neighborhood Association Land Use Committee



# Forest Park Neighborhood Association

C/O Neighbors West Northwest  
434 NW 6<sup>th</sup> Ave. Suite 202  
Portland, Oregon 97209

December 4, 2024

Morgan Steele | Land Use Services | Environmental Review & Greenway Review  
503.865.6437 | Morgan.Steele@portlandoregon.gov  
Christine Caruso | Land Use Services | Conditional Use Review  
503.865.6420 | Christine.Caruso@portlandoregon.gov

## **REQUEST FOR RESPONSE**

**Case File: LU 24-041109 CU EN GW**

**Pre App: PC # 22-142445**

Dear Morgan Steele and Christine Caruso,

Forest Park Neighborhood's boundaries touch W. Burnside Road on the south and cross NW Cornelius Pass Road on the north. The neighborhood includes Forest Park and a long piece of City of Portland that extends around the park. Our neighborhood has taken an active role in land use matters that affect the ecological health of the park since our founding. We received your Request For Response dated November 4, 2024 regarding PGE's proposed transmission corridor project in Forest Park and are pleased to provide this response.

Here is a summary of our main points:

1. The city should require PGE to provide a letter from Bonneville Power Administration (BPA) or Northern Grid<sup>1</sup> confirming that this project must be built by 2028 to ensure stability of the grid and prevent widespread rolling blackouts as PGE has asserted. Independent corroboration of this assertion would be invaluable. BPA is obligated to provide transmission and a reliable grid. PGE's Narrative reminds us of "BPA's obligation to generate, market, and distribute electric power in the Pacific Northwest."<sup>2</sup>
2. PGE's publicly available Transmission Plans describe Phases 4 and 5 of this project in more detail than PGE has provided to the city to date. The implications of these future projects for the park are dire. These projects (Phases 3, 4, and 5) should be considered as a whole,

<sup>1</sup> [www.northerngrid.com](http://www.northerngrid.com) says "NorthernGrid is the outcome of a single transmission planning region, facilitating regional transmission planning, enabling one common set of data and assumptions, identifying regional transmission projects through a single stakeholder forum, and eliminating duplicative administrative processes." Retrieved December 4, 2024.

<sup>2</sup> Narrative, p. vii

and PGE should be put on notice that they have plenty of time to identify, design, and acquire Alternative Routes for Phase 5.

3. PGE's Alternatives Analysis has critical flaws. For example, PGE's proposed project is never evaluated against the same standards as Alternative Routes in the Toth Report. No Alternative Routes in the Toth Report take advantage of shifting back and forth across St Helens Road to avoid impediments the way existing distribution powerlines do – the Alternative Routes are all limited to one side of the highway. We believe there are Alternative Routes available for Phase 3.
4. PGE's Easement allows them to remove tall trees, but requires them to protect the first 14' (height) of native vegetation in their Right-of-Way except along construction roads and at structure locations. We don't see any other exception for construction and maintenance. PGE's proposal appears likely to result in the loss of much vegetation in much of their Right of Way. This may violate their Easement.

If the city demonstrates to PGE that the proposed project is more expensive and perhaps more time consuming than expected, that will help PGE justify using one of the Alternative Routes outside of Forest Park.

This is an extremely complicated application with many technical elements. We try to focus here on comments that are most relevant to the approval criteria and staff's evaluation of the application. We put our comments in italics in the next sections to help differentiate them from material that we quote.

## **1. Why the city should require PGE to provide a letter from BPA or Northern Grid**

*To demonstrate an urgent need for this project, PGE asserts that very bad things will happen if their proposed project isn't completed by 2028. PGE would prefer to use the existing easement in Forest Park because it makes their life easier, and the park pays the price for that ease. The stated 2028 deadline also helps them eliminate most Alternatives because they would take "too long" to implement.*

*We think PGE should be required to provide a letter from an independent authority on transmission in our area (BPA or Northern Grid). This is like requiring a Service Provider letter, only in reverse – to demonstrate this project is truly needed and isn't just about generating profits for PGE shareholders. Here's what PGE says in the Revised Narrative (p. 43):*

Forest Park Natural Resources Management Plan (FP NRMP)

*Chapter 8. Implementation Procedures, Section B: Exceptions to the Plan*

*Approval Criteria for Exceptions to the Plan: The exception will be approved if:*

*(A). The proposal meets all the criteria for minor amendments.*



**Applicant's response: The Proposed Project meets all the criteria for minor amendments. As per the FP NRMP, the approval criteria for minor amendments are as follows:**

*A. There is a demonstrated need for the proposal.*

**Applicant's Response: As explained in greater detail in Section A4 of this application, the primary purpose of the Proposed Project is to maintain a reliable power supply to the Portland Metropolitan Region by implementing transmission configuration improvements that address identified transmission vulnerabilities. These improvements will enable PGE to meet federal and PGE electrical transmission reliability standards and assist with meeting system-wide plans for an improved and resilient electrical grid. Recently, demand forecasts for electricity have increased substantially due to several factors, including vehicle electrification, peak summer temperature increases, increasing adoption of residential air conditioning, and industrial growth in the Portland Metropolitan Region.**

**Phase 3 of the Harborton Reliability Project (the Proposed Project) has independent utility from future phases of the project. It is meant to direct an additional source of 230 kV power to the Harborton Substation and resolve the three-terminal line condition by creating three new two-terminal lines connected to Harborton Substation. Phase 4 anticipates a time when PGE's existing transmission wires running through Forest Park west of existing Tower 2996 need to be replaced with larger wire. PGE is performing early studies to determine different alternatives to address this need by reusing existing towers and staying within the established Utility ROW. If the need can be demonstrated and alternatives are evaluated to show work in Forest Park is necessary, PGE would initiate a separate land use process. Phase 5 looks even further ahead to when additional energy will need to be transmitted from the north to the Portland area. Although PGE anticipates this need, no specific routes or designs have been developed at this time. Similar to Phase 4, if any work is proposed in Forest Park, PGE would initiate a separate land use process at that time.**

**Without the urgently needed Proposed Project, the existing transmission capacity concerns will result in rolling blackouts during forecast peak demand days by or before 2028. The need for this Proposed Project has been demonstrated.**

*PGE repeatedly asserts in this application that Phase 3 of this project must be completed by 2028 to avoid rolling blackouts. Appendix C, the Alternatives Analysis (page 5), includes section 1.3 Context for Regional Power Transmission (p. 5) that explains at length that PGE's grid has been subject to special rules since 1996 because of the South of Alston (SOA) path, that this project will resolve the limiting element in the SOA path. What is relevant here is that "BPA identifies SOA path limits." BPA should know what's needed to resolve any issues on the SOA path.*

**We believe BPA or Northern Grid should be able to confirm whether this project is needed, and if it is, if completion by 2028 is as urgent as PGE claims.**

*BPA just announced \$3 Billion investment in grid and substation projects in addition to \$2 Billion investments they announced last summer<sup>3</sup>. Will any of those projects alleviate the limiting factor for the SOA without this project?*

*Building transmission is a capital investment that is very profitable for PGE and their shareholders. We want to make sure they are cooperating and not competing with BPA to provide transmission capacity to increase profits. PGE's November 8, 2024 Investor Presentation<sup>4</sup> shows that they plan to invest \$130 million this year in Transmission, increasing to \$435 million in 2028.*

## **2. PGE's Transmission Plans Describe Phases 4 and 5**

*PGE's application makes it clear that this project is Phase 3 of a 5 phase project, all related to the Harborton substation. The city's June 5, 2024 Incomplete Letter for this application (LU 24-041109 CU EN GW) asked PGE to provide the location and scope for this project's Phases 4 and 5.<sup>5</sup>*

*PGE's Revised Narrative responded:*

**Phase 3 of the Harborton Reliability Project (the Proposed Project) has independent utility from future phases of the project. It is meant to direct an additional source of 230 kV power to the Harborton Substation and resolve the three-terminal line condition by creating three new two-terminal lines connected to Harborton Substation. Phase 4 anticipates a time when PGE's existing transmission wires running through Forest Park west of existing Tower 2996 need to be replaced with larger wire. PGE is performing early studies to determine different alternatives to address this need by reusing existing towers and staying within the established Utility ROW. If the need can be demonstrated and alternatives are evaluated to show work in Forest Park is necessary, PGE would initiate a separate land use process. Phase 5 looks even further ahead to when additional energy will need to be transmitted from the north to the Portland area. Although PGE anticipates this need, no specific routes or designs have been developed at this time. Similar to Phase 4, if any work is proposed in Forest Park, PGE would initiate a separate land use process at that time.**

*But PGE's own publicly available Transmission Plans make the scope and timing of Phases 4 and 5 much clearer. Let's start with the **PGE Long Term Local Transmission Plan For the 2023-2024 Planning Cycle, December 26th, 2023** – it explains itself, the demonstrated need for the projects in the plan, and even points us to the folder with these Transmission plans:<sup>6</sup>*

<sup>3</sup> <https://www.bpa.gov/about/newsroom/news-articles/20241015-bpa-maintains-tx-expansion-momentum-with-13-new-proposed-projects> . Retrieved 12/4/24.

<sup>4</sup> <https://investors.portlandgeneral.com/static-files/b28a1d03-9164-43d8-829d-e3437b6daab6> , p. 8. Retrieved 12/4/24.

<sup>5</sup> Incomplete Letter for LU 24-041109 CU EN GW, page 15 item 2.

<sup>6</sup> Unfortunately, the link to the page with the Transmission Plans provided in that paragraph doesn't work. This one does: <http://www.oasis.oati.com/pge/> . Open the page, then scroll down the window on the left to find the

This 2023 Longer Term Local Transmission Plan reflects Quarters 5 through 8 of the local transmission planning process as described in PGE's Open Access Transmission Tariff (OATT) Attachment K. The plan includes all transmission system facility improvements identified through this planning process. A power flow reliability assessment of the plan was performed which demonstrated that the planned facility additions will meet NERC and WECC reliability standards.

PGE's OATT is posted on its Open Access Same-time Information System (OASIS) at <http://oasis.oati.com/PGE> . Additional information regarding Transmission Planning is located in the Transmission Planning folder on PGE's OASIS.

*PGE's 2023 Transmission Plan shows Phase 3, the **Harborton Reliability Project** has a project completion date of November 2026 (p. 19).*

#### **Harborton Reliability Project<sup>7</sup>** (p. 24)

**Justification:** The Harborton reliability project reconfigures the system to increase 230kV transmission capacity into the Portland area and provide a stronger source to the Northwest Portland 115kV system. One key purpose of this project is that it addresses transmission operations flexibility for the loss of the Rivergate bulk power transformer. The Harborton 115kV and 230kV yards will be constructed in a breaker and a half configuration with five 230kV lines into Harborton and three 115kV lines. One bulk 230/115kV transformer at Harborton is also installed. The Canyon-E 115kV line will be reconducted during the project.

**Scope:** Currently underway for this project is a reconductor to the E-Wacker 115 kV line to 1272 ACSS. Next, the 115 kV system will be reconfigured to create a Harborton-Wacker 115 kV circuit, which will also be reconducted to 1272 ACSS. The 115 kV line idled for this reconfiguration will be utilized for the fifth 230 kV source into Harborton. The Horizon-St Marys-Trojan 230 kV circuit will be looped into Harborton, creating the Harborton-Horizon 230 kV, Harborton-St Marys 230 kV, and Harborton-Trojan #2 230 kV circuits.

*Please note:*

- 1. The Justification does not mention reliability or the famous SOA problem, only a need for increased capacity and operations flexibility. The scope is what we expect.*

Transmission Planning folder, then the Local Transmission Plans folder. You will see PGE Transmission Plans going back through 2011.

<sup>7</sup> Some of the PGE Transmission Plans call this the **Lower Columbia Resiliency Project** instead.

**Phase 5:** *The 2023 Plan shows the Harborton-Trojan #3 and #4 230kV project has a project completion date of April 2030 (p. 43). Based on what PGE has told us, **this is Phase 5.***

**Harborton-Trojan #3 and #4 230kV (p. 44)**

**Justification:** This project was identified in order to access new, decarbonized resources in order for PGE to meet obligations under Oregon’s HB 2021 law. The lines will be part of the SOA path, which is fully subscribed. Because of power transfer distribution factor (PTDF), nearly all transfers of power from any part of the WECC footprint have at least some impact on SOA. Given that SOA is fully subscribed, no new transmission service is available to PGE’s service territory without adding new incremental capacity to the SOA path. It will construct two additional lines from Trojan to Harborton, utilizing existing right-of-way. This project will alleviate market congestion constraints on the SOA path for PGE and increase the total transfer capability between BPA and PGE.

**Scope:** PGE to construct two 230kV lines from Harborton to Trojan using existing right-of-way. The Harborton-Rivergate #1 230kV line will also be reconductored as part of this project.

**Project Status:** PGE is exploring implementing this project in the Longer Term Planning Horizon. This project will be submitted for a regional coordination study.

*Please note:*

- 1. The Justification is explicit that this project will be build using “existing right-of-way” and the only place PGE has existing right-of-way for this project is inside Forest Park. This project would eliminate an additional 15 acres of mature closed canopy forest in the park, and because these lines need to connect into Harborton, that connection would eliminate the remaining strip of forest in PGE’s easement – the one they were so pleased to protect during Phase 3. Our attached PGE 230kV Transmission Configuration Schematics try to explain where all the lines go.*
- 2. The Project Status says this project will be submitted for a regional coordination study in this 2023 plan.*
- 3. The SOA problem has migrated to this Harborton-Trojan #3 and #4 project.*
- 4. The 2024 Transmission Plan has all the same information about this project except it doesn’t include the Project Status section that mentions the regional coordination study. Did the study get done, and if so, what was the result?*

**Phase 4:** *The 2024 Transmission Plan adds this “reconductor” project with a completion date of April 2029 (p. 19), less than 5 years from now and only a few years after Phase 3. Based on what PGE has told us, **this is Phase 4:** replacing old wire with new higher capacity wire from the upper*

*edge of Phase 3 into Hillsboro and Beaverton. If approved, about a mile and a half of this work will happen in Forest Park. This project seems inevitable – PGE is installing the new high capacity wire throughout the Phase 3 project. Putting new wire on the rest of these lines is a cheap way to add transmission capacity, but the work will have a significant impact on Forest Park. The only question might be whether PGE will want to replace any towers.*

#### **Evergreen-Harborton and Harborton-St Marys 230kV Reconductor (p. 20)**

**Justification:** 5-year planning models indicate significant N-1-1 overloading on Evergreen Harborton. 10-year planning models indicate significant N-1-1 overloading on Harborton-St Marys as well. Given that both circuit run on common towers, it is recommended to reconductor both simultaneously to reduce cost and environmental impact in sensitive areas.

**Scope:** Reconductor both Evergreen -Harborton 230kV and Harborton-St Marys 230kV lines for all sections that are not currently 2156 ACSS.

*According to PGE’s application materials, reconductoring (upgrading wires) on existing towers is not a low-impact operation for the park:*

String new transmission wire between Harborton Substation and Tower 2996 to create new ... transmission lines on the existing transmission towers... This will require the establishment of temporary work areas for construction access, temporary soil storage, line-pulling, and equipment turnaround space.<sup>8</sup>

***Added together, Phases 3, 4, and 5 would clearcut over 20 acres in the Northern Unit of Forest Park, eliminating any remaining forest in PGE’s Right-of-Way, and would do more harm in another mile and a half of PGE’s east/west Transmission Corridor.***

*Doubling the width of the clearing in the north/south Transmission Corridor will deeply fragment the Northern Unit -- create a much wider clearing for small wildlife to cross, dry out much more of the closed canopy forest in this sensitive Unit to the dehydrating influence of the sun and encouraging invasive species, and divide Forest Park’s narrowest dimension down the middle.*

*This the opposite of the FP NRMP’s vision for this Unit in Forest Park: to creating intact old growth forest. “Above all, wildlife habitat in the North Unit should be protected.” (p. 105). The goals and plans in the FP NRMP related to the utility corridors are to minimize and revegetate them to the greatest extent possible to reduce fragmentation.*<sup>9</sup> *Clearing all the forest in the north/south*

<sup>8</sup> Revised Application for: Portland General Electric Company (PGE) Harborton Reliability Project, October 28, 2024. Narrative, Applicant’s Written Statement, page 7.

<sup>9</sup> From the FP NRMP, pages 159-160:

“RE-8C/N: **Utility** Corridor Management

Goal: Improve wildlife habitat value.

Objective(s): Reduce fragmentation of interior forest habitat.

*Transmission Corridor, churning the soil, and removing much of the understory vegetation would deeply damage the park forever.*

*We are concerned that PGE has broken this large project in Forest Park into three smaller pieces to try to hide the full impact on the park. But doing this project in stages and at different times will likely mean repeated harm to the vegetation, soils, and wildlife habitat in the park. Resources protected in one phase may be eliminated in the next.*

*Many regulators have a minimum threshold for projects they review. PGE may also have avoided having this project reviewed by other authorities by breaking it into these small pieces.*

*PGE's 2015 Transmission Plan<sup>10</sup> also shows that they started planning the Harborton Reliability Project that year (p. 17) with a projected completion in 2021. The description of the project is essentially the same as it is today. The Transmission Plan says "Project planning is complete; this project was submitted for inclusion in the 2016 capital budget and was recommended for approval."*

*So if the project planning was complete in 2015 and recommended for approval in the 2016 capital budget, why was the permit for Phase 3 not submitted until 2024?*

*We wonder if PGE deliberately waited so they could blame a looming power grid crisis for not having time to investigate, design, and acquire alternate routes outside the park. If they had started work on those Alternatives in 2015, they would have had time to acquire easements and resolve impairments. Now they threaten us with rolling blackouts if they are forced to do that work.*

### **3. PGE's Alternatives Analysis has Critical Flaws**

*PGE's proposed project is never evaluated against the same standards as Alternative Routes in the Toth Report. The Toth Report standard is if any small part of an Alternate Route's Right-of-*

- Replace non-native vegetation with native plants having higher wildlife habitat value.*
- Reduce disturbance and erosion.*
- Add cavity nesting opportunities.*
- Avoid expansion or addition of utility easement areas.*

*Recommendation (or Working Hypothesis): Interior forest habitat is one of the most valuable habitat types. It is rare in the Portland-Vancouver area. Avoid or reduce fragmentation of this habitat.*

*Manage powerline corridors to maximize forest canopy, to maximize diversity of native plant species, to minimize invasive non-native plants, and to minimize disturbance and erosion. Allow large tree species to grow as close to powerlines as possible. Top conifers interfering with powerlines rather than removing them. Where conifers are not practicable, native small trees and shrubs should be grown. Remove non-native shrubs, notably Himalayan blackberry and Scot's broom, and replace with native conifers, small trees or shrubs.*

*Unit: Middle and North Units.*

*Rationale: Powerline corridors are significant interruptions of Forest Park interior forest habitat...."*

<sup>10</sup> Portland General Electric Company's Longer Term Local Transmission Plan For the 2014-2015 Planning Cycle

*Way (ROW) crosses the Forest Park boundary that is a fatal flaw (Severe Impediment that can't be mitigated). Compare this to the damage inflicted on Forest Park by PGE's Proposed Project, which PGE has no problem justifying. The Toth report also doesn't differentiate between tall trees (conifers and Big Leaf Maples) and lower growing trees like Oregon white oak that PGE says can live intact under their powerlines. Here's how the Toth Report treats any Alternative Route's ROW that overlaps even a tiny part of Forest Park (p.15):*

#### Forest Park Proximity

Alternative routes to the Preferred Route are being examined due to the Preferred Route's impact on Forest Park. Routing a transmission line through any portion of Forest Park would require clearing of trees within the ROW which is undesirable to the City of Portland.

Forest Park Proximity was determined to be a Severe Impediment where the ROW overlaps with the park boundaries. Forest Park Proximity was determined to be a Moderate Impediment if the route is close enough that "danger trees" are located inside Forest Park. A danger tree is one that, although outside the ROW, is tall enough that if it fell it could impact the transmission wires (see Figure 4 below). PGE manages vegetation and trees in all its transmission ROW.<sup>11</sup>

*"Constructability" is another Toth impediment score that hasn't been applied equally to PGE's Proposed Project and the Alternate Routes in the report. This is how the report evaluates it (p. 16):*

#### Constructability

A site visit to the Project Area was conducted by PGE personnel on September 20, 2022, evaluating aspects of the route alternatives that may not be apparent from a desktop review, such as extreme construction methods, terrain issues, and significant impact to existing landowners.

Constructability impacts from the site visit classified as Severe Impediments are:

1. Locating structures immediately southwest of Highway 30 ROW, which likely require extreme construction methods, such as drilling micropiles, in order to stabilize exposed rock face.
2. Extremely steep terrain that may create clearance violations requiring taller structures and create access challenges for routine maintenance or outage restoration.
3. Relatively dense residential development that has significant impact to existing landowners and may require either taller structures with longer span lengths

<sup>11</sup> See <https://portlandgeneral.com/outages-safety/safety/tree-maintenance>.

or tighter structure spacing with more angles. These observations supplement the Building Proximity impediment.

*Nothing is said about the steep slopes, historic landslide, and difficult access of PGE's proposed project site. There are existing distribution powerlines on the southwest side of Highway 30, some resemble 115kV poles used in PGE's Tonquin project.*

Toth Alternative Route 2:

*This is how Toth describes the two fatal flaws (Severe Impediments) they assessed for Route 2, Forest Park Proximity and Constructability (p. 19-20):*

Forest Park Proximity – Severe

Alternative 2 ROW includes lands within Forest Park and would require a new easement. Trees within its ROW would need to be cleared. Trees outside of its ROW that are within Forest Park would constitute danger trees to a new line along this route alternative. The trees are located up a steep slope from the alignment, which renders the number of danger trees much higher than in a flat ROW.

*The area of overlap for this ROW with Forest Park is very small, particularly compared to the overlap of PGE's Proposed Project. Compared to PGE's Proposed Project, the number of affected trees would be tiny. The report also does not differentiate between conifers and tall Big Leaf Maples and Oregon white oaks that PGE has assured us can generally thrive under powerlines. If monopoles were positioned thoughtfully it is possible that no oaks would be affected by Route 2.*

*Toth's application of Forest Park Proximity resulted in a Severe Impediment rating for Route 2, even though the overlap of that ROW with the Forest Park Boundary is very small and adjacent to St Helens Road. There may be valuable Oregon white oaks in that overlap area, but PGE has assured us that those oaks can grow under their powerlines.*

*The other Severe Impediment that resulted in the elimination of Route 2 in Toth's assessment is "Constructability."*

Constructability – Severe

Alternative 2 requires locating structures immediately southwest of Highway 30 ROW that may require extreme construction methods. Alternative 2 also traverses relatively dense residential development that has significant impact to existing landowners and may require either taller structures with longer span lengths or tighter structure spacing with more angles.

In summary, Alternative 2 is not a viable alternative due to its Severe impediments from Forest Park Proximity and Constructability.



*Alternative Route 2 does not cross directly over any homes. There is a wide ROW for Highway 30 near most homes near this route and it isn't clear how many private properties the actual ROW would cross. There are existing distribution power lines on the southwest side of Hwy 30, so most of this Route was constructable for them. Any problems with Constructability were not weighed equally against the similar issues with PGE's Proposed Project, which was assumed to be perfectly easy.*

*Toth also did not consider another Alternative that follows the example of the existing powerlines adjacent to Highway 30 – those lines shift back and forth across the Highway to avoid impediments. In some areas the railroad tracks are further from the highway and there is more room for powerlines on the northeast side of the road. In other areas there is a wide ROW available on the southwest side of the highway that can be used.*

#### *Toth Alternative Route 4:*

*The other apparently viable Alternative is Route 4. Here's the Toth explanation of the only Severe Impediment for this option (p. 22):*

#### Alternative 4

##### Existing PGE Facilities – Severe

Alternative 4 would need to occupy the ROW used by the Harborton-St Helens 115 kV transmission line. In order to downgrade this impediment, an alternate corridor for the 115 kV line, as well as underbuilt 13kV distribution and telecommunication lines, must be found. As detailed in the rest of this study, severe impediments exist for other route alternatives that would apply to a 115 kV single-circuit corridor as well.

Examining the engineering and operational feasibility of co-locating three overhead transmission lines in one corridor is beyond the scope of this study.

*The report concludes (p. 22):*

In summary, Alternative 4 is a viable route alternative provided the noted impediments from Residential Buildings, Harborton Conservation Area, Pipeline Proximity, and Existing PGE Facilities can be downgraded. Alternative 4 requires purchasing the Residential Building or a minor deviation to avoid the Residential Building. The existing 115 kV transmission line would need to be relocated elsewhere.

Alternative 4 may need to occupy a reduce ROW width in the Harborton Conservation Area.

*But have we already forgotten Alternative 2? Even if Route 2 isn't suitable for two 230kV lines at this time, it can probably accommodate a single 115kV line without any overlap of Forest Park and minimal overlap of private property that would require easements. If the line is allows to*

*jump back and forth across Hwy 30, perhaps most impediments could be avoided. This obvious solution of using Toth's Alternate Route 2 for the 115kV line hasn't been considered in any of PGE's materials that we've seen.*

*Another alternative would be to move that 115kV line from Alternative Route 4 to PGE's ROW in Forest Park, which would not be used by Harborton-Trojan #1 and #2 if they are moved to Route 4. See our attached PGE 230kV Transmission Line Diagrams 120324.*

*We don't like the Southern Termination Point for any Alternative Routes – it is too close to Miller Creek and risks even more wildlife habitat damage than PGE's Proposed Project.*

***PGE's proposed project must be compared to all the Alternatives on an even footing.***

We believe that given the 5+ years available to plan for Harborton-Trojan #3 and #4, PGE can identify, design, and acquire an Alternative Route outside Forest Park, perhaps using Alternative Route 2 if Route 4 is used in Phase 3.

The best outcome for Forest Park would be for all four of the eventual Harborton-Trojan lines to use routes outside Forest Park.

If a right-of-way for the existing 115kV line currently located in Route 4 is needed in that scenario, it could be located in the PGE right-of-way in Forest Park. 115kV lines have a narrower Transmission Corridor and a much smaller footprint than 230kV lines.

This is the scenario best aligned with the Forest Park Natural Resources Management Plan (FP NRMP) -- for all four Harborton-Trojan 230kV lines to be located outside of Forest Park, which would allow most or all the north-south part of the right-of-way to be restored to mature forest. This would be truly consistent with Conservation Goal 1 in the FP NRMP:

*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.*

#### **4. PGE's Easement Requires them to Protect 14' of Vegetation in their ROW**

The Rights-of-Way Clearing section of the Easement<sup>12</sup> says clearing has to be conducted "in the manner and style as indicated in Exhibit "A". The Rights-of-Way Maintenance section (p. 7) says:

- a. Grantee hereby agrees to comply strictly with the clearing diagram, Exhibit "A," to the end that the visual and ecological impact of the right-of-way on the park is minimized.

In Exhibit A, on p. 14, there is a "Clearing Diagram" with text that says PGE must "preserve" all the trees and vegetation that is 18' below the sag of the lowest line (32'), except along

<sup>12</sup> Appendix F. PGE's Existing Utility Easement in Forest Park, p. 6 of the PDF.

construction roads and at structure locations. PGE is allowed to cut tall trees in the Right-of-Way and Danger Trees.

DANGER TREES : CUT DANGER TREES , BRUSH AND SNAGS WHICH EXTEND ABOVE THE SIGHTING LINE AND WHICH, WHEN FALLING, COULD COME WITHIN 30 FEET OF THE CENTERLINE OF TRANSMISSION. (LIMITS OF DANGER TREE CLEARING SHALL BE 200' SLOPE DISTANCE FROM  $\frac{1}{2}$  OF TRANSMISSION).

RIGHT-OF-WAY : PRESERVE ALL TREES, NATURAL GROWTH AND GROUND COVER THAT EXTEND NO HIGHER THAN A LINE 18 FEET BELOW THE MAXIMUM SAG POSITION OF THE CONDUCTORS EXCEPT ALONG CONSTRUCTION ROADS AND AT STRUCTURE LOCATIONS. PRESERVE ALL TREES , NATURAL GROWTH AND GROUND COVER THAT GROWS BELOW THE SIGHTING LINE .

The lowest conductor in the diagram above the text is a minimum of 32' above the ground, so  $32' - 18' = 14'$  tall vegetation is to be preserved in PGE's Right-of-Way (ROW). This 14' vegetation height is mentioned again in section XIII, Reservation by Grantor, on p. 12 (last sentence in that section).

We don't see an exception to the 14' vegetation preservation requirement for construction or maintenance in the body of the easement, "except along construction roads and at structure locations." Miriam Webster's online dictionary defines along to mean "in a line matching the length or direction of" – so any disturbance or removal should be limited to areas close to the construction roads and at structure locations.

The enormous equipment that PGE plans to use to remove downed trees, drill holes, install pole bases, etc. is likely to demolish vegetation they roll over.

### Previous Comment/Requests

We also want to briefly mention our earlier email dated 11-22-24 asking PGE to provide this additional information:

1. Any additional studies, reports, or surveys they have related to the Alternatives Analysis and the Toth Report's Marina Way options.
2. The letter(s) PGE's Property Rights Group sent to property owners who might be affected by the Marina Way options, a list of property owners the letter was sent to, and the responses that PGE received.

### Conclusion

Forest Park Neighborhood respectfully requests city staff to recommend against approving this application for the reasons stated above. The harm it would do to Forest Park is so great that it is difficult to comprehend. The sight of massive machines lumbering up and down the steep slopes of the park and piling up large mature trees and squishing small critters is devastating.

If this application is approved, we believe that PGE should be required to maintain the mitigation plantings of oak for 50 years – that’s how long we believe it will take for that plant community to establish and stabilize enough to discourage invasive species.

Our neighborhood appreciates city staff’s hard work to evaluate and respond to this complex and technical application.

We also appreciate PGE’s efforts to inform the community about this project and to find mitigation solutions. We just don’t think those solutions are even remotely adequate compensation for the damage the project would do. There are alternatives where these lines could be located outside the park, PGE needs to be able to justify turning to them.

Thank you for your consideration. Sincerely,

Carol Chesarek  
Co-Chair, Forest Park Neighborhood Association Land Use Committee

Attachments:

- PGE 230kV Transmission Line Diagrams 120324

*Forest Park Neighborhood welcomes everyone: all races, religions, countries of origin, sexual orientations, genders and abilities. Our neighborhood is enriched by the diversity of our residents and community members. Each individual has dignity and the potential to contribute to our community as a whole. We embrace and respect one another first as neighbors, and we strive to look out for each other. We encourage everyone to engage with our neighborhood to create a welcoming and safe place to live, work and recreate. Hate has no home here.*



## Forest Park Neighborhood Association

C/O Neighbors West Northwest  
434 NW 6<sup>th</sup> Ave. Suite 202  
Portland, Oregon 97209

December 22, 2024

Morgan Steele | Land Use Services | Environmental Review & Greenway Review  
503.865.6437 | Morgan.Steele@portlandoregon.gov  
Christine Caruso | Land Use Services | Conditional Use Review  
503.865.6420 | Christine.Caruso@portlandoregon.gov

### **REQUEST FOR RESPONSE**

**Case File: LU 24-041109 CU EN GW**

**Pre App: PC # 22-142445**

Dear Morgan Steele and Christine Caruso,

Forest Park Neighborhood wants to add some supporting material to the Response we submitted December 4, 2024 in response to your November 4, 2024 Request For Response regarding PGE's proposed transmission corridor project in Forest Park.

These files are attached:

1. PGE Transmission Plans - Harborton Project Excerpts 2015-2024 122224
2. PGE Tonquin Project pole height and width diagrams 112424
3. NorthernGrid Regional Transmission Plan for the 2022-2023 Northern Grid Planning Cycle<sup>1</sup>

A few notes related to these items.

The PGE Transmission Plans are referenced in our December 4, 2024 letter. This attachment includes excerpts for all Harborton related projects from the 2015-2024 transmission plans for easy reference.

Our December 4, 2024 letter referred to PGE's Tonquin project power poles. We are now sending PGE's graphics from their Tonquin project that show those poles.

<sup>1</sup> [https://www.northerngrid.net/private-media/documents/2022-23\\_Regional\\_Transmission\\_Plan.pdf](https://www.northerngrid.net/private-media/documents/2022-23_Regional_Transmission_Plan.pdf) retrieved 122324

PGE participates in NorthernGrid’s regional transmission planning. According to the NorthernGrid 2022-2023 Regional Transmission Plan (attached, see page 4):

The NorthernGrid is an unincorporated association of entities that either own or operate, or that propose to own or operate, electric transmission facilities in the Western Interconnection. The NorthernGrid promotes coordinated, open, and transparent transmission planning and facilitates compliance with Federal Energy Regulatory Commission (“FERC”) Orders No. 890 and 1000.

The purpose of this regional transmission plan is (page 18):

The objective of the regional transmission analysis is to identify a set of transmission projects that cost effectively or efficiently meet the transmission service and reliability needs of the NorthernGrid region 11 ten years in the future.

The final cost-effective NorthernGrid regional transmission plan, shown on page 20, doesn’t include any projects in western Oregon or Washington. There are no north/south projects to resolve problems with the South of Alston (SOA) path that PGE says in their Revised Narrative<sup>2</sup> urgently needs to be fixed. This leaves us skeptical that this PGE project is as urgent as PGE says it is.

### **Oregon White Oak Mitigation – Allowed tree height?**

PGE’s Mitigation Plan<sup>3</sup> proposes planting Oregon White Oak alongside (but not directly below) their powerlines.

PGE proposes to expand the existing woodland in specific areas in the existing and proposed transmission corridors while still maintaining a vertical clear zone between the wires and the top of mature oak tree heights to remain consistent with PGE’s vegetation management protocols (see **Figure 10**). While oaks would not be planted directly beneath the wires, the edges of the cleared corridors would be amenable to the establishment of oaks. In total, the revegetation plan calls for the planting of 386 Oregon white oak trees in the Park.

Figure 10<sup>4</sup> in PGE’s Mitigation Plan shows oaks with only a 65’ mature height, but according to the Marion Soil and Water Conservation District<sup>5</sup>, Oregon white oak (*Quercus garryana*) trees grow up to 100’ in height. The 65’ tall “mature oak” is also shown near a power pole, where the

<sup>22</sup> LU 24-041109 *Revised Application for: Portland General Electric Company (PGE) Harborton Reliability Project*, October 28, 2024. Narrative, Applicant’s Written Statement, page 9.

<sup>3</sup> LU 24-041109 Harborton Reliability Project Habitat Mitigation Plan *City of Portland Land Use Application Appendix D*, page 49

<sup>4</sup> Mitigation Plan, *Appendix D*, page 51

<sup>5</sup> <https://www.marionswcd.net/plants/oregon-white-oak/> retrieved 122224

power lines are highest off the ground. Further from the pole, the lines will sag lower, further limiting oak tree height.

We also note that PGE's easement<sup>6</sup> allows powerlines to come within 32' of the ground at their lowest point. We are concerned that many of the oaks that PGE proposes to plant alongside (but not directly under) their powerlines will be stunted by pruning, unable to reach their mature height and spread. Under Title 11, topped trees are considered removed. This would be a warped form of mitigation.

PGE's Mitigation Plan is intended to satisfy the requirements in the Forest Park Natural Resources Management Plan, *Chapter 8. Implementation Procedures, Section B: Exceptions to the Plan Approval Criteria for Exceptions to the Plan: The exception will be approved if:*

*(D). Any long-term adverse impacts of the proposed action on resource values are fully mitigated within the Management Unit.*

Based on the information presented in the Mitigation Plan, we aren't confident that PGE's plan to mitigate resource damage by planting oaks near the transmission lines is viable.

Forest Park Neighborhood respectfully requests city staff to recommend against approving this application.

We appreciate city staff's hard work to evaluate and respond to this complex and technical application.

Thank you for your consideration. Sincerely,

Carol Chesarek  
Co-Chair, Forest Park Neighborhood Association Land Use Committee

*Forest Park Neighborhood welcomes everyone: all races, religions, countries of origin, sexual orientations, genders and abilities. Our neighborhood is enriched by the diversity of our residents and community members. Each individual has dignity and the potential to contribute to our community as a whole. We embrace and respect one another first as neighbors, and we strive to look out for each other. We encourage everyone to engage with our neighborhood to create a welcoming and safe place to live, work and recreate. Hate has no home here.*

<sup>6</sup> LU 24-041109 Appendix\_F\_Existing\_PGE\_Utility\_Easement\_in\_Forest\_Park, page 14

## **PGE Transmission Plans 2015 – 2024 | Harborton Related Project Excerpts**

### **2015 Plan: Portland General Electric Company's Longer Term Local Transmission Plan for the 2014-2015 Planning Cycle, Appendix A, Page 17**

[www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE\\_Long\\_Term\\_LTP\\_2015\\_FINAL.pdf](http://www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE_Long_Term_LTP_2015_FINAL.pdf)

#### **Harborton Reliability Project**

- **Project Purpose**

- Address transmission operations flexibility for the loss of the Rivergate bulk power transformer.
- Reconfigure the system to reduce exposure and provide a stronger source to the Northwest Portland 115kV system.

- **Project Scope**

- Rebuild the Harborton 115kV yard to a breaker and one half configuration.
- Build a new 230kV breaker and one half yard at Harborton substation.
- Route five 230kV lines to Harborton.
- Install a new bulk power transformer at Harborton.
- Reconnector the 115kV lines from Harborton to Canyon.
- Reconfigure the 115kV system to provide a source to Northwest Portland from Harborton substation.

- **Project Status**

- Project planning is complete; this project was submitted for inclusion in the 2016 capital budget and was recommended for approval.

- **Project Requirement Date**

- The project is currently projected for completion in 2021.



## **2016 Plan: Portland General Electric's Near Term Local Transmission Plan for the 2016-2017 Planning Cycle, Appendix A, Page 16**

[www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE\\_Near\\_Term\\_LTP\\_2016\\_FINAL.pdf](http://www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE_Near_Term_LTP_2016_FINAL.pdf)

### **Harborton Reliability Project**

- **Project Purpose**

- Address transmission operations flexibility for the loss of the Rivergate bulk power transformer.
- PGE plans to reconstruct the Harborton substation with a new 115kV yard and add a new 230kV yard. The 230kV sources will be provided by looping in the existing Trojan-Rivergate 230kV line, and the Horizon-Trojan-St Marys 230kV line (see the Horizon Phase II project). The new Harborton bulk power transformer will provide a strong source to improve voltage and power flow performance of the Northwest Portland 115kV system.

- **Project Scope**

- Rebuild the Harborton 115kV yard to a breaker and one half configuration.
- Build a new 230kV breaker and one half yard at Harborton substation.
- Route five 230kV lines to Harborton.
- Install a new bulk power transformer at Harborton.
- Reconnector the 115kV lines from Harborton substation to Canyon substation.
- Reconfigure the 115kV system to provide a source to Northwest Portland from Harborton substation.

- **Project Status**

- Under Construction

- **Project Requirement Date**

- The project is currently projected for completion in 2020.

**2017 Plan: Portland General Electric Company's Longer Term Local Transmission Plan for the 2016-2017 Planning Cycle, Appendix A, Page 14.**

[www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE\\_Long\\_Term\\_LTP\\_2017\\_FINAL.pdf](http://www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE_Long_Term_LTP_2017_FINAL.pdf)

**Lower Columbia Resiliency Project**

- **Project Purpose:**
  - Increase transfer capacity into the Portland area via the South of Allston transfer path
- **Project Scope:**
  - Construct a new 230kV transmission line from Trojan Substation to Harborton Substation
- **Project Status:**
  - Preliminary planning
- **Project Requirement Date:**
  - No date established; TBD

**2018 Plan: Portland General Electric Company's Near Term Local Transmission Plan for the 2018-2019 Planning Cycle, Appendix A, Page 16.**

[www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE\\_DRAFT\\_Near\\_Term\\_LTP\\_2018.pdf](http://www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE_DRAFT_Near_Term_LTP_2018.pdf)

**Harborton Reliability Project**

- **Project Purpose**

- Address transmission operations flexibility for the loss of the Rivergate bulk power transformer.
- Reconfigure the system to reduce exposure and provide a stronger source to the Northwest Portland 115kV system.

- **Project Scope**

- Rebuild the Harborton 115kV yard to a breaker and one half configuration.
- Build a new 230kV breaker and one half yard at Harborton substation.
- Route five 230kV lines to Harborton.
- Install a new bulk power transformer at Harborton.
- Reconnector the 115kV lines from Harborton to Canyon.
- Reconfigure the 115kV system to provide a source to Northwest Portland from Harborton substation.

- **Project Status**

- Under Construction

- **Project Requirement Date**

- The project is currently projected for completion in 2020.

**2019 Plan: Portland General Electric Company's Longer Term Local Transmission Plan for the 2018-2019 Planning Cycle, Appendix A, Page 16.**

[www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE\\_Longer\\_Term\\_LTP\\_2019\\_FINAL.pdf](http://www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE_Longer_Term_LTP_2019_FINAL.pdf)

**Lower Columbia Resiliency Project**

- **Project Purpose:**
  - Increase transfer capacity into the Portland area via the South of Allston transfer path.
- **Project Scope:**
  - Construct a new 230kV transmission line from Trojan Substation to Harborton Substation.
  - Reconductor the existing Harborton-Rivergate 230kV line river crossing.
- **Project Status:**
  - PGE is exploring implementing this project in the Longer Term Planning Horizon. This project will be submitted for a regional coordination study in accordance with FERC Order 1000.
- **Project Requirement Date:**
  - No date established; TBD.

## **2020 Plan: Portland General Electric Company's Near Term Local Transmission Plan for the 2020-2021 Planning Cycle, Appendix A, Page 14.**

[www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE\\_Near\\_Term\\_LTP\\_2020\\_Final.pdf](http://www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE_Near_Term_LTP_2020_Final.pdf)

### **Harborton Reliability Project**

- **Project Purpose**

- Address transmission operations flexibility for the loss of the Rivergate bulk power transformer.
- Reconfigure the system to reduce exposure and provide a stronger source to the Northwest Portland 115 kV system.

- **Project Scope**

- Rebuild the Harborton 115 kV yard to a breaker and one half configuration.
- Build a new 230 kV breaker and one half yard at Harborton substation.
- Route five 230 kV lines to Harborton.
- Install a new bulk power transformer at Harborton.
- Reconductor the 115 kV lines from Harborton to Canyon.
- Reconfigure the 115 kV system to provide a source to Northwest Portland from Harborton substation.

- **Project Status**

- Under Construction.

- **Project Requirement Date**

- The initial Phase 1 of this project includes the 115 kV yard rebuild, the Harborton-Rivergate 115 kV circuit and Harborton-St Helens 115 kV circuit. This phase was completed in April 2020.
- The remaining Phase 1 of this project includes the 230 kV yard, the Harborton-Rivergate 230 kV circuit, the Harborton-Trojan #1 230 kV circuit and the new bulk power transformer. This phase is scheduled for completion by Q2 2021.
- Phase 2 of this project first reconductors the E-Wacker 115 kV line to 1272 ACSS. Next, the 115 kV system is reconfigured to create a Harborton-Wacker 115 kV circuit, which will also be reconducted to 1272 ACSS. The 115 kV line idled for this reconfiguration will be utilized for the fifth 230 kV source into Harborton. The Horizon-St Marys-Trojan 230 kV circuit will be looped into Harborton, creating the Harborton-Horizon 230 kV, Harborton-St Marys 230 kV, and Harborton-Trojan #2 230 kV circuits. This phase is scheduled to begin after the Canyon-Urban 115 kV Reconductor and is scheduled for completion by 2025.

**2021 Plan: Portland General Electric Company's Longer Term Local Transmission Plan for the 2020-2021 Planning Cycle, Appendix A, Page 26.**

[www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE\\_Longer\\_Term\\_LTP\\_2021\\_FINAL.pdf](http://www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE_Longer_Term_LTP_2021_FINAL.pdf)

**Evergreen-Harborton 230kV Reconductor Project**

- **Project Purpose:**
  - Increase the capacity of the Evergreen-Harborton 230kV line to eliminate thermal overload concerns.
- **Project Scope:**
  - Reconductor the Evergreen-Harborton 230kV circuit (approximately 10.01 miles) to 1272 ACSS.
- **Project Status:**
  - Preliminary planning.
- **Project Requirement Date:**
  - Estimated 6/2029

**>> NOTE: This is the only Harborton related project in the 2021 Plan <<**

**2022 Plan: Portland General Electric Company's Near Term Local Transmission Plan for the 2022-2023 Planning Cycle, Appendix A, Page 16.**

[www.oasis.oati.com/woa/docs/PGE/PGEdocs/Final\\_Near\\_Term\\_LTP\\_2022\\_12-28-22.pdf](http://www.oasis.oati.com/woa/docs/PGE/PGEdocs/Final_Near_Term_LTP_2022_12-28-22.pdf)

**Harborton Reliability Project**

- **Project Purpose**
  - Address transmission operations flexibility for the loss of the Rivergate bulk power transformer.
  - Reconfigure the system to reduce exposure and provide a stronger source to the Northwest Portland 115 kV system.
- **Project Scope**
  - Rebuild the Harborton 115 kV yard to a breaker and one half configuration.
  - Build a new 230 kV breaker and one half yard at Harborton substation.
  - Route five 230 kV lines to Harborton.
  - Install a new bulk power transformer at Harborton.
  - Reconductor the 115 kV lines from Harborton to Canyon.
  - Reconfigure the 115 kV system to provide a source to Northwest Portland from Harborton substation.
- **Project Status**
  - Under Construction.
- **Project Requirement Date**
  - The initial Phase 1 of this project includes the 115 kV yard rebuild, the Harborton-Rivergate 115 kV circuit and Harborton-St Helens 115 kV circuit. This phase was completed in April 2020.
  - The remaining Phase 1 of this project includes the 230 kV yard, the Harborton-Rivergate 230 kV circuit, the Harborton-Trojan #1 230 kV circuit and the new bulk power transformer. This phase is scheduled for completion by Q2 2021.
  - Phase 2 of this project first reconductors the E-Wacker 115 kV line to 1272 ACSS. Next, the 115 kV system is reconfigured to create a Harborton-Wacker 115 kV circuit, which will also be reconducted to 1272 ACSS. The 115 kV line idled for this reconfiguration will be utilized for the fifth 230 kV source into Harborton. The Horizon-St Marys-Trojan 230 kV circuit will be looped into Harborton, creating the Harborton-Horizon 230 kV, Harborton-St Marys 230 kV, and Harborton-Trojan #2 230 kV circuits. This phase is scheduled to begin after the Canyon-Urban 115 kV Reconductor and is scheduled for completion by Q3 2026.

**2023 Plan: PGE Long Term Local Transmission Plan for the 2023-2024 Planning Cycle, Corrective Action Plans (Planned Projects), Page 24 and Interconnection and Renewables Access Projects, Page 44.**

[www.oasis.oati.com/woa/docs/PGE/PGEdocs/2023\\_Local\\_Transmission\\_Plan.pdf](http://www.oasis.oati.com/woa/docs/PGE/PGEdocs/2023_Local_Transmission_Plan.pdf)

Page 19 shows a Project Completion Date of November 2026 for Harborton Reliability Project. Page 43 shows a Project Completion Date of April 2030 for Harborton-Trojan #3 and #4 230kV.

### Harborton Reliability Project (page 24)

**Justification:** The Harborton reliability project reconfigures the system to increase 230kV transmission capacity into the Portland area and provide a stronger source to the Northwest Portland 115kV system. One key purpose of this project is that it addresses transmission operations flexibility for the loss of the Rivergate bulk power transformer. The Harborton 115kV and 230kV yards will be constructed in a breaker and a half configuration with five 230kV lines into Harborton and three 115kV lines. One bulk 230/115kV transformer at Harborton is also installed. The Canyon-E 115kV line will be reconducted during the project.

**Scope:** Currently underway for this project is a reconductor to the E-Wacker 115 kV line to 1272 ACSS. Next, the 115 kV system will be reconfigured to create a Harborton-Wacker 115 kV circuit, which will also be reconducted to 1272 ACSS. The 115 kV line idled for this reconfiguration will be utilized for the fifth 230 kV source into Harborton. The Horizon-St Marys-Trojan 230 kV circuit will be looped into Harborton, creating the Harborton-Horizon 230 kV, Harborton-St Marys 230 kV, and Harborton-Trojan #2 230 kV circuits.

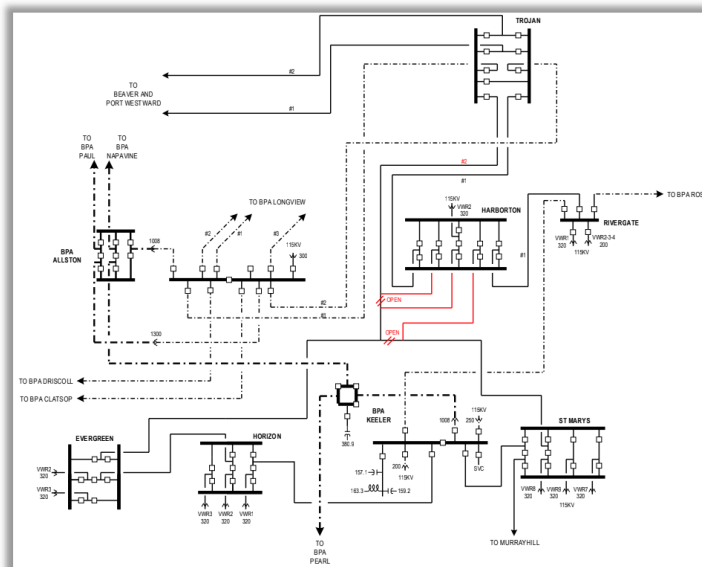
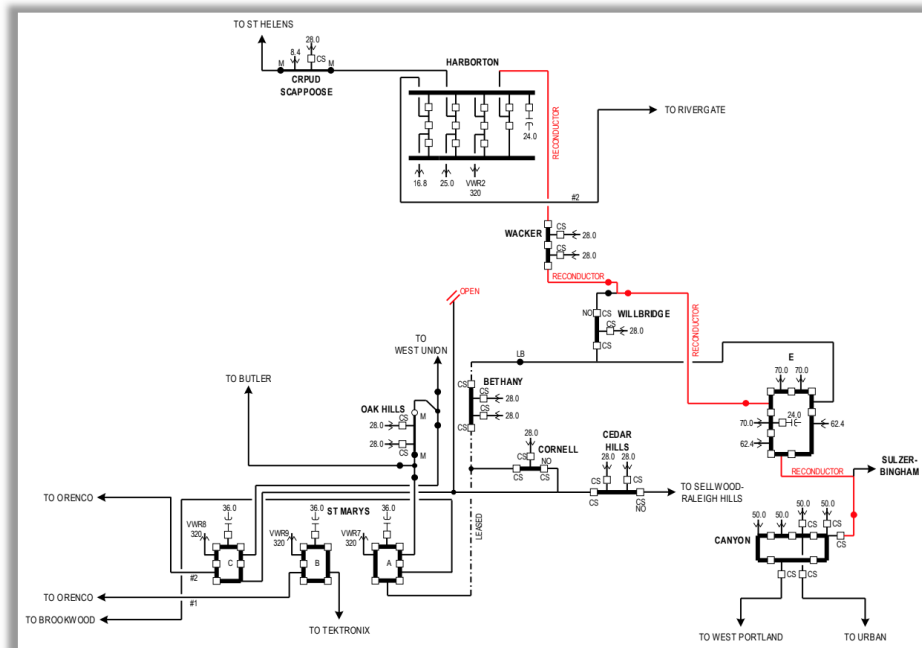


Figure 3: Harborton Reliability Project 230kV





### Harborton-Trojan #3 and #4 230kV (page 44)

**Justification:** This project was identified in order to access new, decarbonized resources in order for PGE to meet obligations under Oregon’s HB 2021 law. The lines will be part of the SOA path, which is fully subscribed. Because of power transfer distribution factor (PTDF), nearly all transfers of power from any part of the WECC footprint have at least some impact on SOA. Given that SOA is fully subscribed, no new transmission service is available to PGE’s service territory without adding new incremental capacity to the SOA path. It will construct two additional lines from Trojan to Harborton, utilizing existing right-of-way. This project will alleviate market congestion constraints on the SOA path for PGE and increase the total transfer capability between BPA and PGE.

**Scope:** PGE to construct two 230kV lines from Harborton to Trojan using existing right-of-way. The Harborton-Rivergate #1 230kV line will also be reconductored as part of this project.

**Project Status:** PGE is exploring implementing this project in the Longer Term Planning Horizon. This project will be submitted for a regional coordination study.

**2024 Draft Plan: PGE Near Term Local Transmission Plan \*Draft\* for the 2024-2025 Planning Cycle, Corrective Action Plans, Pages 20, 21 and Interconnection and Renewables Access Projects, Page 30.**

[www.oasis.oati.com/woa/docs/PGE/PGEdocs/2024\\_Local\\_Transmission\\_Plan-Draft.pdf](http://www.oasis.oati.com/woa/docs/PGE/PGEdocs/2024_Local_Transmission_Plan-Draft.pdf)

Page 19 shows a Project Completion Date of April 2029 for Evergreen-Harborton and Harborton/St Marys 230kV Reconductor.

Page 20 shows a Project Completion Date of November 2026 for Harborton Reliability Project.

Page 43 shows a Project Completion Date of April 2030 for Harborton-Trojan #3 and #4 230kV.

**Evergreen-Harborton and Harborton-St Marys 230kV Reconductor (page 20)**

**Justification:** 5-year planning models indicate significant N-1-1 overloading on Evergreen Harborton. 10-year planning models indicate significant N-1-1 overloading on Harborton-St Marys as well. Given that both circuit run on common towers, it is recommended to reconductor both simultaneously to reduce cost and environmental impact in sensitive areas.

**Scope:** Reconductor both Evergreen -Harborton 230kV and Harborton-St Marys 230kV lines for all sections that are not currently 2156 ACSS.

**Harborton Reliability Project (page 21)**

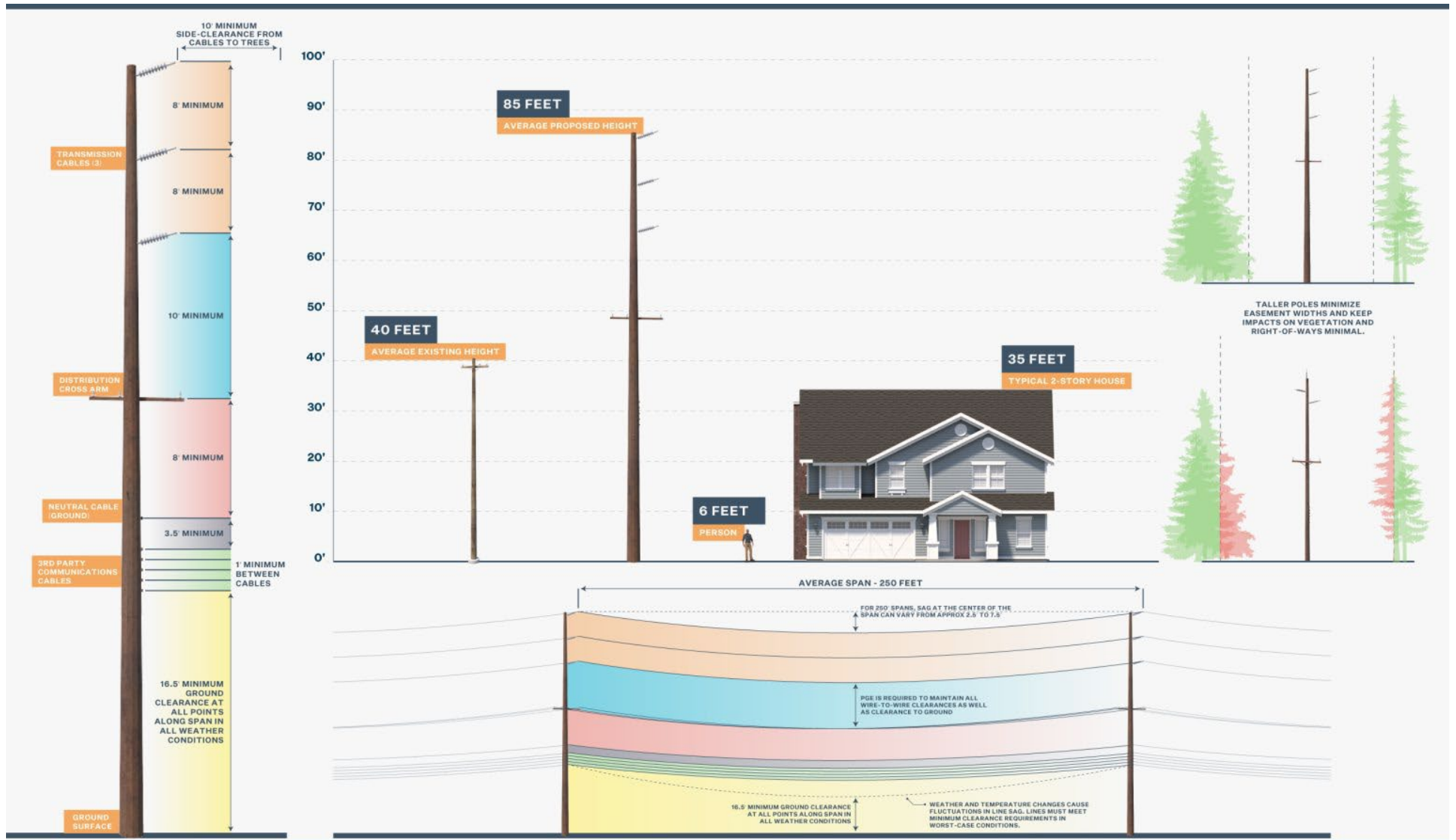
**Justification:** The Harborton reliability project reconfigures the system to increase 230kV transmission capacity into the Portland area and provide a stronger source to the Northwest Portland 115kV system. One key purpose of this project is that it addresses transmission operations flexibility for the loss of the Rivergate bulk power transformer. The Harborton 115kV and 230kV yards will be constructed in a breaker and a half configuration with five 230kV lines into Harborton and three 115kV lines. One bulk 230/115kV transformer at Harborton is also installed. The Canyon-E 115kV line will be reconducted during the project.

**Scope:** Currently underway for this project is a reconductor to the E-Wacker 115 kV line to 1272 ACSS. Next, the 115 kV system will be reconfigured to create a Harborton-Wacker 115 kV circuit, which will also be reconducted to 1272 ACSS. The 115 kV line idled for this reconfiguration will be utilized for the fifth 230 kV source into Harborton. The Horizon-St Marys-Trojan 230 kV circuit will be looped into Harborton, creating the Harborton-Horizon 230 kV, Harborton-St Marys 230 kV, and Harborton-Trojan #2 230 kV circuits.

### Harborton-Trojan #3 and #4 230kV (page 30)

**Justification:** This project was identified in order to access new, decarbonized resources in order for PGE to meet obligations under Oregon's HB 2021 law. The lines will be part of the SOA path, which is fully subscribed. Because of power transfer distribution factor (PTDF), nearly all transfers of power from any part of the WECC footprint have at least some impact on SOA. Given that SOA is fully subscribed, no new transmission service is available to PGE's service territory without adding new incremental capacity to the SOA path. It will construct two additional lines from Trojan to Harborton, utilizing existing right-of-way. This project will alleviate market congestion constraints on the SOA path for PGE and increase the total transfer capability between BPA and PGE.

**Scope:** PGE to construct two 230kV lines from Harborton to Trojan using existing right-of-way. The Harborton-Rivergate #1 230kV line will also be reconductored as part of this project.



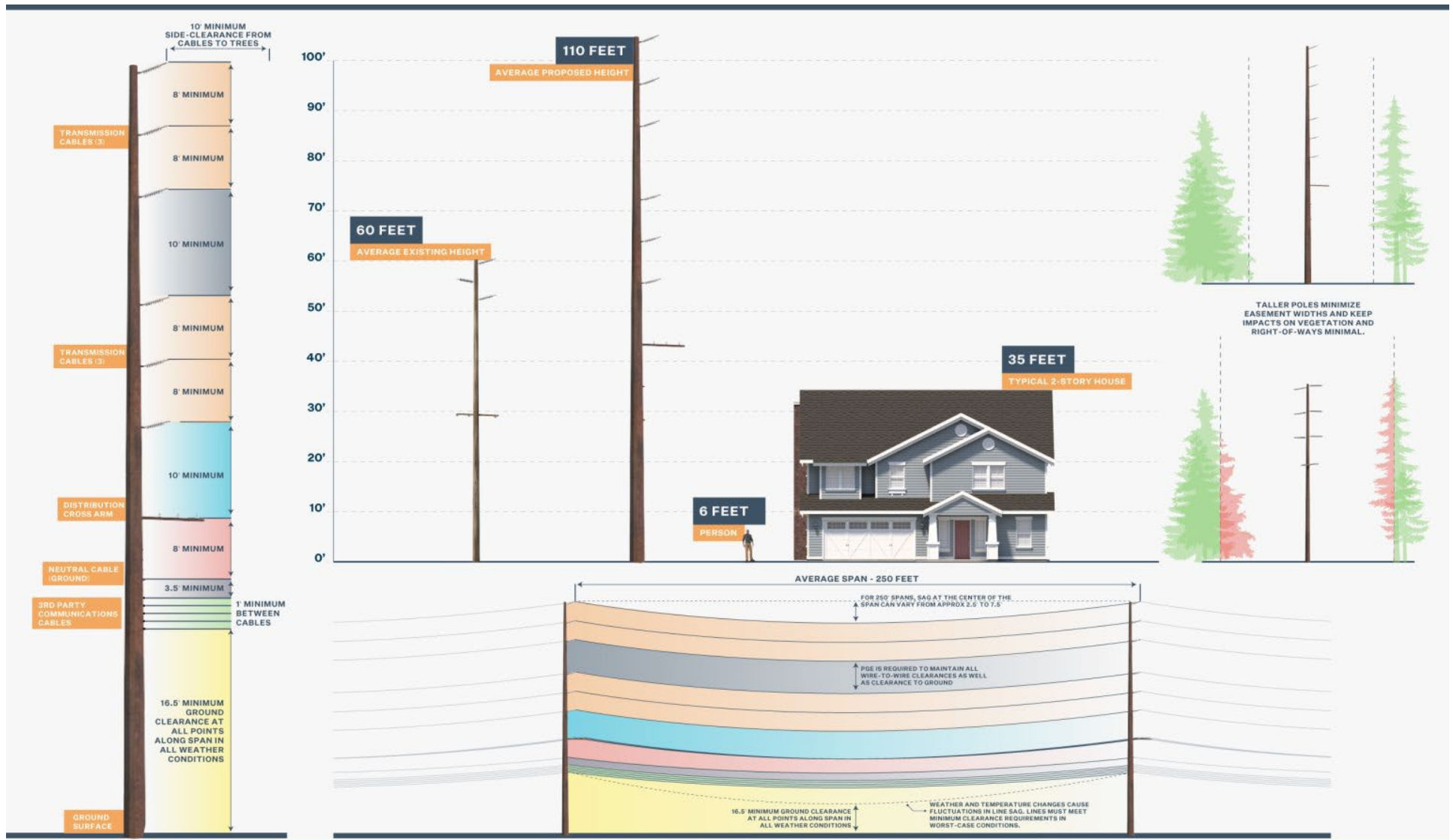
## TONQUIN SUBSTATION PROJECT TYPICAL STRUCTURE SPECIFICATIONS

### SINGLE CIRCUIT PROPOSED STRUCTURES

Visualizations are for discussion purposes only.  
Final design is subject to change pending public,  
engineering, and regulatory review.



An Oregon kind of energy.™



## TONQUIN SUBSTATION PROJECT TYPICAL STRUCTURE SPECIFICATIONS

### DOUBLE CIRCUIT PROPOSED STRUCTURES

Visualizations are for discussion purposes only.  
Final design is subject to change pending public,  
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**Regional Transmission Plan  
for the 2022-2023  
NorthernGrid Planning Cycle**

***NorthernGrid Member Planning Committee (MPC)  
Approval Date: December 14, 2023***

## Acknowledgements:

### **NorthernGrid Members**

Avista Corporation  
BHE U.S. Transmission (MATL)  
Bonneville Power Administration  
Chelan County PUD  
Idaho Power Company  
NorthWestern Energy  
NV Energy  
PacifiCorp  
Portland General Electric  
Puget Sound Energy  
Seattle City Light  
Snohomish County PUD  
Tacoma Power

### **Interregional or non-Incumbent Transmission Project Sponsors**

PowerBridge – Cascade Renewable Transmission Project  
Absaroka Energy, LLC – Loco Falls Greenline  
TransCanyon, LLC – Cross-Tie Transmission Line  
Great Basin Transmission, LLC – Southwest Intertie Project – North

### **Neighboring Regional Entities**

CAISO  
WestConnect

### **Participating State Agencies**

Idaho PUC  
Idaho OER  
Montana PSC  
Montana Consumer Counsel  
Oregon PUC  
Utah Department of Commerce  
Utah Office of Energy Development  
Washington UTC  
Washington EFSEC  
Wyoming PSC

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## Executive Summary

The NorthernGrid is an unincorporated association of entities that either own or operate, or that propose to own or operate, electric transmission facilities in the Western Interconnection. The NorthernGrid promotes coordinated, open, and transparent transmission planning and facilitates compliance with Federal Energy Regulatory Commission ("FERC") Orders No. 890 and 1000. The NorthernGrid is comprised of entities regulated by FERC and those that are not. The regional transmission planning process for the enrolled FERC jurisdictional Transmission Providers is defined in each provider's Open Access Transmission Tariff Attachment K – Regional Planning Process. The NorthernGrid entities that are not regulated by FERC participate in the regional transmission planning process through the NorthernGrid Planning Agreement for Planning Cycle 2022-2023.

The NorthernGrid 2022-2023 Regional Transmission Plan was developed according to the NorthernGrid regional planning process. The load and resource assumptions, transmission power flow conditions, analysis methods, and criteria used are described in the 2022-2023 Study Scope. A link to the Study Scope is provided in Appendix B: Study Scope. The objective of the planning process is to identify the projects that either cost-effectively or efficiently meet the needs of the NorthernGrid region in a 10-year horizon.

The process began in the first quarter with each NorthernGrid Member submitting their 10-year forecasted load, projected resource additions, retirements, public policy requirements, and projected transmission additions. During this quarter, non-member entities were also permitted to submit regional transmission projects for consideration. Four non-incumbent transmission project developers, Absaroka Energy LLC, TransCanyon LLC, Great Basin Transmission LLC, and PowerBridge LLC, submitted transmission projects. Three of these developers also submitted information that met the Qualified Developer criteria for the purpose of project cost allocation. All this information was summarized and incorporated into a Study Scope. The Study Scope also describes the process, assumptions, power flow case selection, production cost modeling use, analysis methods, and criteria.

The Members chose several Western Electricity Coordinating Council (WECC) 2032 and 2033 power flow base cases representing heavy summer, heavy winter, and light spring conditions for reliability analysis. These cases were modified to achieve the following three transmission stress conditions:

- 2032 heavy summer loads with high power flow as follows: from Oregon to California, from Washington and Oregon to Idaho, and Alberta to Montana,
- 2031-2032 heavy winter loads with typical seasonal generation resource dispatch and power flow from Montana to Alberta, and
- 2033 light spring loads with high power flows from California to Oregon.

An additional heavy winter power flow case was developed through analysis of the 2032 Anchor Data Set production cost model (PCM) to analyze westbound transmission flows from Wyoming wind resources across the Northern Grid region. The hour with the heaviest westbound flows out of Wyoming

1 was selected to represent regional transmission stress conditions during high Wyoming wind  
2 generation. This hour occurred at noon on December 11, 2032, in the PCM model.

3 Each power flow case's regional transmission configuration was modified to represent 28 unique  
4 regional combinations of the submitted regional transmission projects. The combinations ranged from  
5 including no to all submitted regional transmission projects. Then, contingency analysis was performed  
6 on these power flow cases using 230 kV and above electrical facility contingencies submitted by the  
7 Members. Facilities within the NorthernGrid region and adjacent regions were monitored for reliability  
8 criteria violations.

9 The regional combinations were ranked based on the weighted number of reliability criteria violations  
10 occurring during the contingency analysis. The regional combination with the fewest violations received  
11 the highest ranking. The 2023 Regional Transmission Plan was selected based on the regional  
12 combination ranking and total estimated cost of the projects included in the regional combination.

13 The regional combination of Boardman to Hemingway, Gateway West Phase 1, and Cascade Renewable  
14 Transmission Project received the highest contingency analysis ranking. A review of the violations  
15 identified that the eliminated violations changed from slightly above to slightly below the criteria  
16 threshold. When considering this minimal improvement and the additional project cost, the  
17 combination including Cascade Renewable Transmission Project was deemed less cost effective than the  
18 regional combination of Boardman to Hemingway and Gateway West Phase 1. A cost allocation  
19 analysis was not required because no Qualified Developers' projects were selected into the Regional  
20 Transmission Plan. Figure 1 below depicts the projects evaluated and those, with pink highlight, that  
21 were determined to be the most efficient and cost-effective combination for the NorthernGrid region  
22 given the analysis performed as described in this report.

23

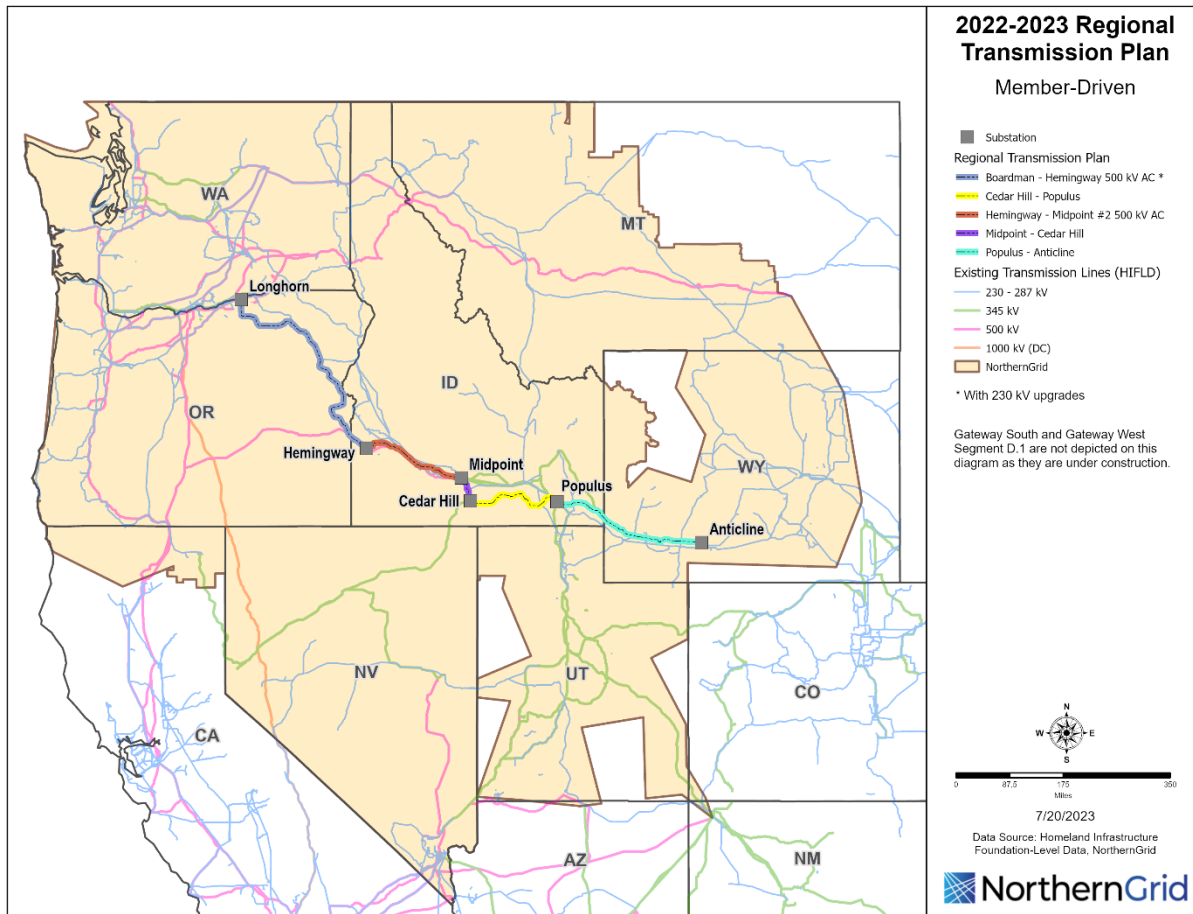


Figure 1: Regional Transmission Plan, regional combination 11

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9

## 10 Regional Transmission Plan Development

### 11 Transmission Planning Requirements

12 The Federal Energy Regulatory Commission (“FERC”) requires, through orders 890 and 1000, each  
13 Transmission Provider (“TP”) to publish local and regional transmission plans on a periodic basis using  
14 open and transparent processes. FERC requires that each Transmission Provider develop and file their  
15 transmission planning processes for FERC’s acceptance. Once accepted, the processes are published in  
16 the provider’s Open Access Transmission Tariff Attachment K – Transmission Planning Process.

17 Additionally, FERC requires all TPs to participate in transmission planning regions to develop these  
18 regional transmission plans. For the NorthernGrid, TPs who meet certain requirements may enroll in the  
19 region to become an Enrolled Party. The regional transmission planning process for the Enrolled Parties  
20 is defined in each Enrolled Party’s Open Access Transmission Tariff Attachment K.

21 Federal, municipality, and public utility district electric utilities are not subject to FERC regulation, but  
22 also perform local and regional transmission planning to meet their load, resource, and transmission  
23 requirements. These entities voluntarily participate in regional transmission planning with the TPs  
24 through the NorthernGrid Planning Agreement for Planning Cycle 2022-2023.

### 25 NorthernGrid Overview

26 The NorthernGrid regional planning association is composed of Avista (AVA), Bonneville Power  
27 Administration (BPA), Chelan PUD (CHPD), Idaho Power Company (IPC), BHE U.S. Transmission as the  
28 owner of the Montana Alberta Tie Line (MATL), NorthWestern Energy (NWMt), NV Energy (NVE),  
29 PacifiCorp East and West (PACE and PACW), Portland General Electric (PGE), Puget Sound Energy (PSE),  
30 Seattle City Light (SCL), Snohomish PUD (SNPD), and Tacoma Power (TPWR). The Member Balancing  
31 Authority Areas and SNPD load service footprint are illustrated in Figure 2 below.

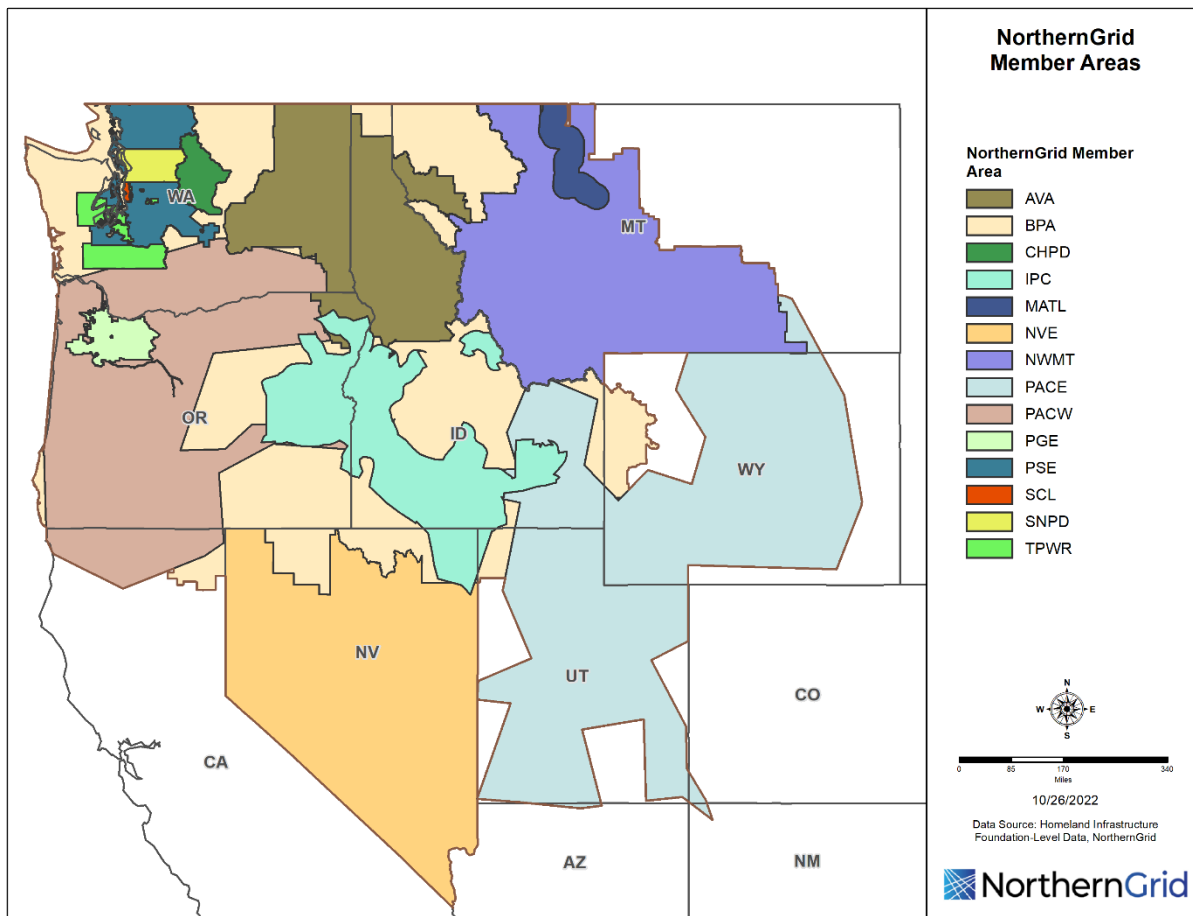


Figure 2: NorthernGrid region

## Planning Development

The intent of FERC Order No. 1000 is to improve the regional planning process and identify opportunities for any transmission developer, incumbent or non-incumbent, to coordinate and develop solutions that are both beneficial to the developer as well as the regional system to which that developer interconnects. Given proper coordination and communication, only the necessary facilities would get identified, and those facilities would become the Regional Transmission Plan ("RTP"). The RTP is not a construction plan, and the Members have no obligation to build the facilities identified in the RTP.

There are many factors that get considered in a long-term planning process. Utilities are charged with maintaining the reliability of the transmission system as well as ensuring there are sufficient resources and/or transmission service arrangements to serve their respective loads. FERC No. 890 and No. 1000 mandate long-term, coordinated planning at both the local and regional levels. North American Electric Reliability Corporation (NERC) planning standards TPL-001-4 and 5.1 provide criteria for performing contingency analysis on facilities 100 kV and above and is used in the FERC planning process.

1 Integrated resource planning is a complex process that each utility undertakes to identify and meet its  
2 respective generation portfolio needs. Resource planning may contemplate market-driven transmission  
3 sales, public policy requirements and/or considerations, environmental impacts, corporate business  
4 goals, resource adequacy, load growth and/or any other slew of topics that consider or influence the  
5 relationship between the consumer and the utility.

6 The timelines for resource and reliability planning are not one and the same; each follows its own cycle  
7 according to its respective requirements. The timeline for reliability planning is prescribed, cyclical, and  
8 regular: in January of every even-numbered year, a twenty-four-month cycle is initiated for the  
9 purposes of producing a regional transmission plan by the end of December in every odd-numbered  
10 year. This twenty-four-month cycle is listed in the open access transmission tariffs of all the FERC-  
11 jurisdictional utilities and is specified in the NorthernGrid Planning agreement for those non-FERC-  
12 jurisdictional utilities that are Members of the NorthernGrid planning process.

13 The cycle for resource planning is not necessarily “universal” in that all utilities adhere to the same  
14 schedule; the timelines for resource planning are not as prescribed or regular and may be dependent on  
15 external factors such as changes to public policy. Resource planning cycles that initiate at or near the  
16 beginning of a transmission planning cycle or make a shift during the two-year transmission planning  
17 cycle may not necessarily get reflected in the current transmission planning cycle. Once a new resource  
18 need is identified, utilities not only need to identify the public policy-driven resource need for their  
19 system, they often also have to start an open and transparent bidding process to notify all of their need  
20 for resources. There are many mechanisms that drive the need for resource procurement; a change to  
21 public policy requirements is a simple example that illustrates the inherent complexity in any given  
22 resource procurement process.

23 There is a relationship between resource planning and reliability planning. Once the results of the  
24 resource bid are known, the reliability analysis needed to incorporate the results of the resource bid can  
25 begin. Transmission models can then be updated to analyze the impacts of the resources identified in  
26 the resource procurement process.

27 The resource procurement process involves many intricacies. From the identification of the resource  
28 through to the identification of the transmission facilities needed to support the output of the selected  
29 resource, there is the possibility that resources that are identified in a resource procurement process  
30 are not necessarily yet reflected in the current regional planning study.

31 Annually, the Member utilities each compile their collective needs into the form of a Loads and  
32 Resources data submittal which gets submitted to Western Electric Coordinating Council (WECC) as part  
33 of WECC’s base case building process. NorthernGrid uses those WECC base cases in the planning  
34 process.

## 35 Interregional Coordination

36 NorthernGrid met with WestConnect and CAISO to coordinate power flow cases, assumptions, and  
37 methodologies at the Annual Interregional Information Exchange. No interregional projects were  
38 submitted for consideration into the NorthernGrid region in the 2022-2023 cycle. Representatives from

the regions met on a near-monthly basis with some of them being on-site to discuss study efforts, inform one another on any new developments, and identify opportunities for stakeholder engagement.

### State Agency Engagement

Several state agencies participated in the planning process through the Enrolled Parties and States Committee (EPSC). The EPSC reviewed and actively participated in the development of the study scope.

### Stakeholder Engagement

Stakeholders are invited to participate in the public meetings and comment periods. They will also have active involvement in the development of the regional transmission plan. The first period for stakeholder comments begins with the publishing of the Draft Study Scope. There are three main opportunities to provide comment, and they are in response to the following publications: the proposed Study Scope, the Draft Regional Transmission Plan, and the Draft Final Transmission Plan. Members of the public are invited to Subscribe to NorthernGrid activities through the subscription feature on the northerngrid.net website.

### Study Process

The Regional Transmission Plan (“RTP”) is the result of the work performed as outlined in the study scope for the NorthernGrid 2022-2023 regional transmission planning process.

The regional planning process is a “bottom up” approach that begins with a compilation of the Members’ loads, generation resources, local area plans, and regional transmission projects. The Members who are Transmission Providers, in conjunction with participation from stakeholders, public service commissions, and interested parties, have developed local area plans that meet the regulatory requirements for their respective areas. The projects that have been identified in the local area planning process are assumed to be in service for the regional planning effort.

To develop the Plan, the NorthernGrid members (“Members”) established the Baseline Projects which were then evaluated for inclusion in the final Regional Transmission Plan. NorthernGrid used power flow contingency analysis to assess which projects could best meet system reliability performance requirements and transmission needs for the NorthernGrid region in a 10-year future. Members submitted updated Load and Resource information which was incorporated into the study effort.

This regional planning process is intended to focus on those projects that are of “regional significance”. “Regional significance” is not a defined term; rather, it is used to describe those projects whose presence, or lack thereof, would influence the overall reliability of the NorthernGrid region. A local project may improve the ability to serve native load or decrease the number of unplanned outages for a specified subsystem, but typically is not going to influence larger transmission paths. However, it is possible that a project that is more regional in nature may both increase the ability to serve native load as well as influence a larger transmission path.

The production of a Regional Transmission Plan satisfies FERC Order 1000 requirements for each region to produce a plan.



## Study Scope

The objective of the transmission planning study is to produce the NorthernGrid Regional Transmission Plan, through the evaluation and selection of regional and interregional projects that effectively satisfies all the transmission needs within the NorthernGrid region. The regional needs were sourced from member data submissions, including load forecasts, generation resource additions and retirements, projected transmission additions, and public policy requirements. The study scope identifies different power flow conditions and different regional transmission project combinations to assess and develop the RTP. A link to the Study Scope is provided in Appendix B: Study Scope.

## Study Methodology and Criteria

To assess the 2032 loads, resources, and transmission projects anticipated for the NorthernGrid region, a combination of power flow and production cost model techniques were used.

A WECC base case was then put through a production cost modeling effort to identify stressed conditions on the NorthernGrid region based on the economic dispatch of planned resources. The stressed conditions were translated into base cases which became the basis for the analysis effort. The selected base cases were run through a contingency analysis using member-supplied contingencies. All contingencies were categorized per the NERC transmission planning criteria document, "TPL-001-4". The NorthernGrid region as well as immediate neighboring regions were monitored. The analysis of the contingency results accounted for any area-specific member utility criteria, otherwise, the Western Electric Coordinating Council's (WECC) and NERC TPL-001-4 criteria was used.

## Submitted Loads and Resources

Members submitted Loads and Resources data along with their current transmission plans in the first quarter; this data was consolidated and used to develop the Study Scope. The needs of the NorthernGrid region were identified through these submittals. The NorthernGrid region load is forecast to grow at a 0.6 percent annual rate with the Members needing 29,274 MW of new generation capacity to replace the 8,236 MW planned resource retirements. Additionally, Puget Sound Energy submitted updated resource data in the fifth quarter which increased the new generation. All loads and resources characteristics are captured in the Study Scope which is available in Appendix B: Study Scope.

## Submitted Projects

The following projects were submitted by the Members and are identified as having the potential to impact the reliability of the NorthernGrid region.

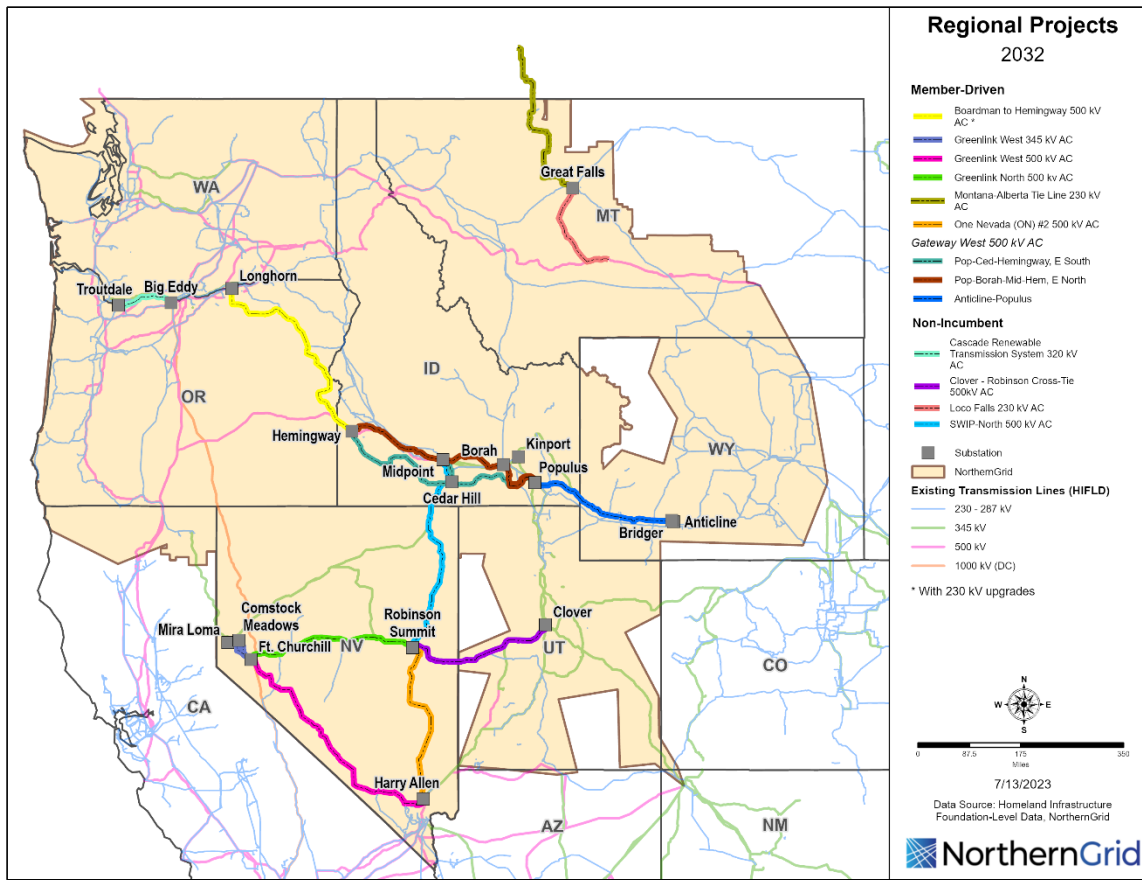


Figure 3: NorthernGrid region with regional project overlay. Proposed 345 kV and 500 kV facilities are displayed.

Figure 3 provides a visual demonstration of the projects that have been submitted for consideration in the Regional Transmission Plan. The legend delineates the member and non-incumbent submitted projects.

### Member Regional Transmission Projects

The regional projects submitted by Members are as follows:

#### Longhorn to Hemingway (Formerly known as Boardman to Hemingway and referenced as B2H)

Longhorn to Hemingway 500 kV, Hemingway to Bowmont 230 kV, and Bowmont to Hubbard 230 kV. Includes three sections of series compensation. The Oregon end of the line was terminated at the Longhorn station, which is near the town of Boardman, Oregon. While the figures do not visually display the 230 kV facilities associated with the B2H project, the 230 kV facilities are included in the model for B2H as they are needed to integrate B2H into Idaho Power's system. The B2H project was selected into the 2020-2021 NorthernGrid Regional Transmission Plan.

**Gateway West-** A suite of project segments were evaluated for Gateway West. These are:

Populus-Cedar Hill-Hemingway 500 kV

1 Populus-Borah-Midpoint-Hemingway 500 kV

2 Midpoint-Cedar Hill 500 kV

3 Anticline-Populus 500 kV

4 Of the Gateway West projects, only the Populus-Cedar Hill-Hemingway and Anticline-Populus 500 kV  
5 lines were selected into the 2020-2021 NorthernGrid Regional Transmission Plan. The Gateway West  
6 projects were grouped per Table 4 in the Study Plan

## 8 **Greenlink West and North**

9 West: Northwest – Harry Allen 500kV, Harry Allen – Fort Churchill 500 kV with series compensation,  
10 Fort Churchill – Comstock Meadows 345 kV & Fort Churchill – Miraloma 345kV. Also includes upgrades  
11 to the 345 kV system.

12 North: Fort Churchill –Robinson Summit 500 kV with series compensation.

13 **One Nevada #2-** 500 kV #2 from Harry Allen to Robinson Summit. This 235-mile line project provides a  
14 second parallel path from the NV Energy South system into Robinson Summit, effectively strengthening  
15 the existing ON line 500kV.

16 **MATL-** MATL proposed a conversion of the MATL alternating current (AC) to direct current (DC). The  
17 rating will increase to a maximum of 500 MW. MATL was not selected into the 2020-2021 Regional  
18 Transmission Plan.

## 19 **Non-Incumbent Transmission Projects**

20 The NorthernGrid regional planning process allows non-incumbent and merchant transmission  
21 developers to submit projects for analysis. Several non-incumbent or merchant transmission projects  
22 were received during the submission period. They are further classified into regional and interregional  
23 transmission projects based on whether the project terminals are within the region or interconnect  
24 between regions, i.e. interregional. For the 2022-2023 planning cycle, none of the submitted non-  
25 incumbent projects were deemed interregional.

26 **Cascade Renewable Transmission Project-** PowerBridge LLC is proposing to construct the Cascade  
27 Renewable Transmission Project. This Project is an 80-mile, 1,100 MW transfer capacity +/- 400 kV HVDC  
28 underground cable (95 percent installed underwater) interconnecting with the AC grid through two +/-  
29 1100 MW AC/DC converter stations at Big Eddy and Harborton substations. There are no proposed  
30 generation resources associated with the transmission line.

31 **Loco Falls Greenline-** Absaroka Energy LLC is proposing a merchant transmission project connecting  
32 Great Falls 230 kV substation to the Colstrip 500 kV Transmission System. The project consists of two  
33 230 kV transmission circuits and a new Loco Mountain Substation with 230 to 500 kV transformation.  
34 There are no proposed generation resources associated with the transmission line.

35 **Cross-Tie Transmission Project-** TransCanyon, LLC is proposing the Cross-Tie Project, a 1,500 MW, 500  
36 kV, series compensated, single circuit HVAC transmission project that will be constructed between  
37 central Utah and east-central Nevada. The project connects PacifiCorp's planned 500-kV Clover

substation with NV Energy's existing 500 kV Robinson Summit substation; both substations reside in the NorthernGrid footprint.

**Southwest Intertie Project North (SWIP)**- Great Basin Transmission, LLC ("GBT"), an affiliate of LS Power, submitted the 275-mile northern portion of the Southwest Intertie Project (SWIP) to the California ISO and NorthernGrid. The SWIP-North Project connects the Midpoint 500 kV substation to the Robinson Summit 500 kV substation with a 500-kV single circuit AC transmission line. With the addition of NV Energy into the NorthernGrid footprint, the SWIP project is now fully within the NorthernGrid footprint. The SWIP is expected to have a bi-directional WECC-approved path rating of approximately 2000 MW.

### Sponsored Projects Request for Cost Allocation

The NorthernGrid Cost Allocation Task Force evaluated the information submitted by PowerBridge LLC, Great Basin Transmission LLC, and TransCanyon LCC. The committee determined each to be a Qualified Developer for their request for their Sponsored Project to be considered for cost allocation.

### Power Flow Case Development

Three Western Electricity Coordinating Council (WECC) power flow base cases were selected from the WECC published cases for the 10-year horizon. The 2032 heavy summer and 2031-2032 heavy winter were chosen to represent the two peak region load conditions. The 2031-2032 heavy winter and 2033 light spring were chosen for their ability to represent high power flow transfers from the eastern to western portions of the region. The resource dispatch in these base cases were adjusted as described below to reflect significant NorthernGrid region transmission stressing conditions.

### Power Flow Case Conditions

These cases were modified to achieve the following transmission stress conditions:

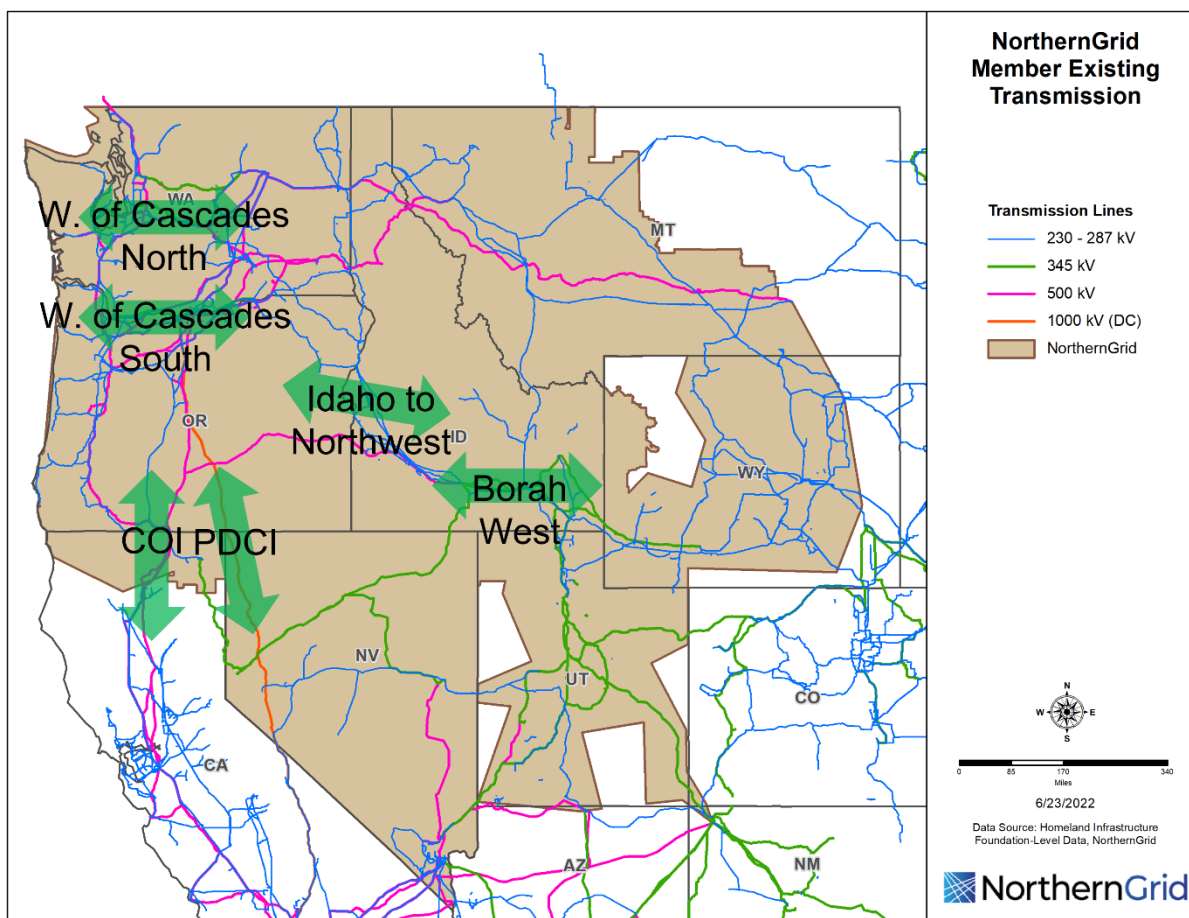
Summer Peak loading conditions. The 2032 Heavy Summer WECC base case was modified to have high southbound flows on the COI and PDCI, high eastbound Northwest to Idaho flows, and southbound MATL flows.

Winter Peak loading conditions. The 2031-2032 Heavy Winter WECC base case was modified to have typical seasonal dispatch for the generation resources, and northbound MATL flows.

California export case. The 2033 Light Spring case was modified to have high northbound flows on the COI and PDCI as well as 2032 loading for the NorthernGrid region.

High Wyoming wind export case. The 2031-2032 Heavy Winter WECC base case resource dispatch was modified to match a production cost model that resulted in peak Wyoming wind conditions. This condition occurred at noon December 11, 2032, in a NorthernGrid modified WECC 2032 Anchor Data Set Production Cost Model (ADS-PCM). NorthernGrid modified the ADS-PCM with the addition of the NorthernGrid submitted transmission projects.

1



2

3 *Figure 4: Paths of interest in the NorthernGrid region*

4 Figure 4 above identifies the WECC paths of most interest to the NorthernGrid region for purposes of  
 5 stressing the transmission system. Not all WECC paths relating to NorthernGrid are displayed, only  
 6 those that are particularly useful in describing the flow patterns on the NorthernGrid transmission  
 7 system for the different stressed conditions. The California-Oregon Intertie (COI) is needed for  
 8 interregional transfers between the California Independent System Operator (CAISO) and NorthernGrid.  
 9 West of Cascades, Idaho to Northwest, and Borah West are all key flowgates for transmitting energy  
 10 from resources to loads within the NorthernGrid region and to California. The power flow case  
 11 NorthernGrid region load, generation, and transmission path transfers are listed in Appendix G: Power  
 12 Flow Case Summary Table 5.

### 13 Contingencies and Criteria

14 Contingency analysis is the modeling of systematically removing specified transmission facilities from  
 15 service and measuring the resulting impact to the transmission system.

1 Thermal overloads occur when the power flowing through a facility exceeds the capability of the facility  
2 which causes heat to build up; excess heat occurs which can then damage the facility. Typically, a  
3 thermal overload results from the loss of a transmission line or transformer. Operationally, there are  
4 multiple ways to mitigate thermal overloads. For example, remedial action schemes are designed to  
5 respond to specific events on the transmission system to help preserve reliability and load service; these  
6 actions are programmed and the outcomes to the transmission system are expected. Generators may  
7 be programmed to reduce their output in response to specific changes on the transmission system.  
8 These operational mitigation actions decrease the loading on the overloaded facility by either reducing  
9 the power or redirecting the power to facilities with larger capabilities.

10 Voltage excursions occur when the reactive support of the transmission system changes, as can happen  
11 during the loss of a facility. Voltage excursions can be high or low, either of which causes undue stress  
12 on the facility experiencing the excursion. Due to the interplay of all the facilities in a transmission  
13 system, the loss of any facility has the potential to cause a voltage excursion on the transmission system.  
14 Voltage excursions can be mitigated automatically through switching schemes on capacitor and/or  
15 reactor banks. Inserting capacitor banks acts to increase the voltage and inserting reactor banks acts to  
16 reduce the voltage. These switching sequences do not add further stress or burden to the transmission  
17 system as they compensate for the reactive need on the transmission system.

18 Members submitted regionally significant contingencies used for reliability analysis to develop the Plan.  
19 Contingencies on major WECC Paths relevant to the NorthernGrid region as well as contingencies on  
20 facilities in the 200 kV and above voltage classes were the primary focus. These regionally significant  
21 contingencies were selected for their criticality to the NorthernGrid region. The contingencies were  
22 categorized using Table 1 from NERC TPL-001-4. The post-contingency system analysis was performed  
23 using applicable NERC and WECC criteria while accounting for any member provided thermal or voltage  
24 criteria.

25 The NorthernGrid region as well as neighboring regions were monitored during the contingency analysis  
26 to determine if any negative impacts occur to the reliability of the transmission system due to the  
27 introduction of the regional projects. If negative impacts to the transmission system of neighboring  
28 regions could not be mitigated through operational changes for any regional combination, coordination  
29 would have to occur to identify the appropriate mitigation and the costs of that mitigation would be  
30 added to the cost of the regional project. No negative contingency results were observed in the  
31 neighboring regions and as such no Material Adverse Impacts were identified for any of the  
32 combinations considered.

### 33 Evaluation of Regional Transmission Project Combinations

34 To determine whether transmission needs within the NorthernGrid may be satisfied by regional  
35 transmission projects, NorthernGrid evaluates the proposed regional and interregional (if any)  
36 transmission projects independently and in regional combinations. The regional combinations are  
37 determined by the MPC based on their knowledge of the NorthernGrid Region. A total of 26 regional  
38 combinations were evaluated. The regional combinations are shown in Appendix C: Full list of the  
39 Regional Combinations.  
40

## Impacts on Neighboring Regions

As stated above, the power flow cases represent the entire western interconnection. Therefore, during the power flow analysis NorthernGrid will monitor for NERC standard and WECC criterion violations occurring in the neighboring regions. Upon identification of a violation in a neighboring region, NorthernGrid will coordinate with the region to confirm validity and whether the violation is due to an existing condition. Mitigation plans for a violation will be determined in accordance with the NorthernGrid Member tariffs and planning agreement.

## Selection of Projects

The objective of the regional transmission analysis is to identify a set of transmission projects that cost-effectively or efficiently meet the transmission service and reliability needs of the NorthernGrid region ten years in the future. To accomplish this goal, NorthernGrid started with base cases that include member planned future regional projects modeled as “in-service”, as displayed below in Figure 4. Planned future regional projects is an undefined term that generally refers to transmission projects that have been identified and possibly funded, but are typically not yet in construction. Collectively, these regional projects comprise the Baseline Member Projects, or the “BLMP”. Sensitivity cases based on combinations of various regional project components being systematically removed from the BLMP cases created a set of Regional Combination cases to test against the performance of the BLMP cases. While the BLMP includes the highest number of regional projects, the analysis will evaluate whether a subset of the BLMP may cost-effectively or efficiently meet the needs of the NorthernGrid region while maintaining system reliability.

After the contingencies were run, the raw counts of violations were ranked using weighting criteria developed by the NorthernGrid Member Planning Committee, Appendix C: Rankings. The rankings give less weight to those contingency categories that either have system adjustments available, can be addressed locally – such as reconfiguring a station to avoid a breaker failure issue, or have been determined to be less likely to occur. The results were further ranked by voltage class and severity of the violation; Appendix C: Rankings lists the full complement of ranking factors used.

The selection of the regional projects in the Plan is determined by the combination of projects that results in a transmission system that most cost-effectively or efficiently exceeds the reliability performance of the other possible combinations of submitted projects.

## Analysis Results

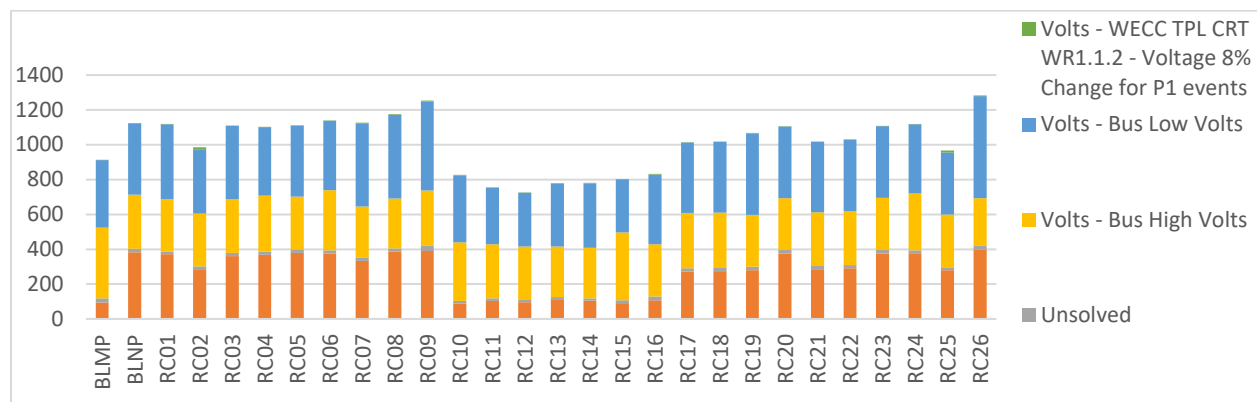
Once the base cases were updated to include the submitted loads, resources, and projects along with adjusting the generation dispatch to match the regional transmission flows described above, they were run through contingency analysis. When running contingency analyses, both the type of contingency and the impact of the contingency are vital to ascertaining the reliability of the transmission system. The type and the impact of the contingency are considered in conjunction with the voltage class of the facility. In general, an outage of higher voltage facilities has a greater impact on the transmission system than the loss of lower voltage facilities. From a NorthernGrid perspective, the contingencies that



1 result in the loss of large amounts of load or the inability to honor transmission arrangements are those  
2 that are regionally significant and warrant further scrutiny.

3 To help identify regionally significant contingencies, each contingency result was multiplied by ranking  
4 factors: voltage class, type of the contingency, and the severity of contingency impact. An overall  
5 contingency ranking is the product of the sum of each ranking factor. The larger the resulting ranking,  
6 the more regionally significant the contingency. Voltage class refers to the kV rating of the facility: the  
7 larger the rating, the larger the ranking factor. Type of the contingency refers to the NERC TPL-001-4  
8 criteria which is the guiding document used to classify all contingencies analyzed. The contingencies in  
9 NERC TPL-001-4 contain scenarios that range from outages of single facilities to severe outages that  
10 impact multiple facilities. It is quite common for a transmission system to have a single facility out of  
11 service, either planned or unplanned, and it is less common for a transmission system to experience  
12 events that result in the loss of multiple pieces of facility. Because of this, single outage contingencies  
13 were given a larger ranking factor than multi-outage contingencies. The impact of a contingency refers  
14 to what happens to the transmission system when a contingency occurs. Contingencies that caused  
15 minor violations were given a smaller ranking factor than those that led to major violations. From a  
16 NorthernGrid perspective, a minor violation is one that can be readily mitigated operationally with no  
17 anticipated damage to facility. A major violation may cause cascading outages or facility damage. Each  
18 contingency from each base case and each regional combination was ranked per the ranking factors.  
19 Ranked contingency results are unitless and are only used as a comparison of performance between  
20 power flow cases.

21 Figure 5 displays the summed rank of contingency violations for each regional combination. Regional  
22 combinations with the lowest sum of ranked violations represent better transmission reliability  
23 performance than those with higher values. Regional combination 12 provides the best reliability  
24 performance while regional combination 26 provides the worst performance for the given set of  
25 contingencies applied to the power flow cases.



26  
27 Figure 5 Regional Combination Reliability Performance Chart

## 28 Regional Transmission Plan

29 The regional combination 12 composed of Boardman to Hemingway, Gateway West Phase 1, and  
30 Cascade Renewable Transmission Project received the most favorable contingency analysis ranking. A



review of the violations identified that the eliminated violations changed from slightly above to slightly below the criteria threshold. When considering this minimal improvement and the additional project cost, the combination including the Cascade Renewable Transmission Project was deemed less cost effective than the regional combination 11 containing Boardman to Hemingway and Gateway West Phase 1. A cost allocation analysis was not required because no Qualified Developers' projects were selected into the Regional Transmission Plan. Figure 6 below depicts the projects that were determined to be the most efficient and cost-effective combination for the NorthernGrid region given the analysis performed as described in this report.

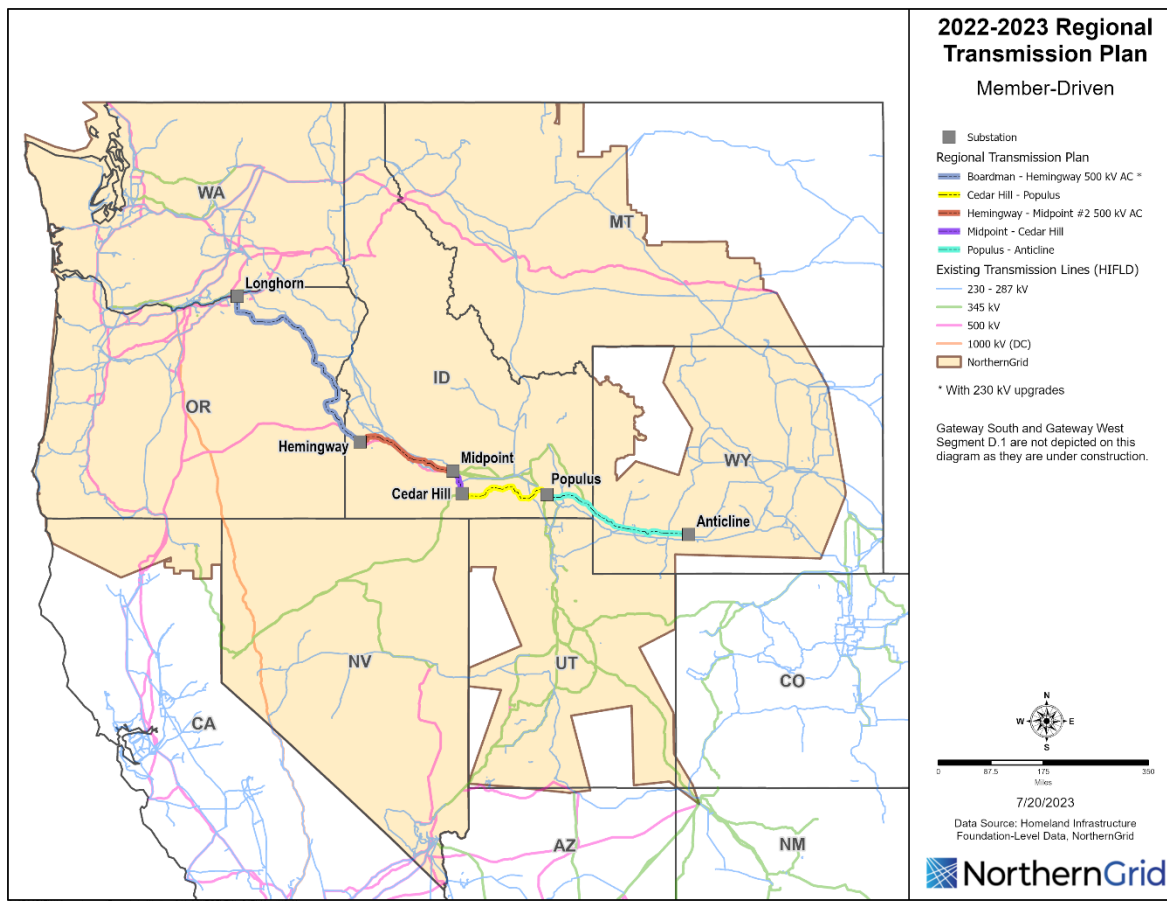


Figure 6: The Regional Transmission Plan for the 2022-2023 NorthernGrid cycle

Regional combination 11, depicted in Figure 6, forms the basis of the Regional Transmission Plan. The plan is composed of the Boardman – Hemingway, Hemingway – Midpoint #2, Midpoint – Cedar Hill, Cedar Hill – Populus, and Populus – Anticline projects. The route selected through southern Idaho changed from the last planning cycle from Hemingway – Cedar Hill – Populus to Hemingway – Midpoint – Cedar Hill – Populus. The construction sequencing change to the northern Gateway West sections west of Cedar Hill (Cedar Hill – Midpoint and Midpoint – Hemingway #2) was driven by recent changes in Idaho Power's load and resource forecasts. New industrial loads east of Boise and the need for the integration of anticipated renewable resources east of Boise necessitate the change. The more northern

1 Midpoint – Hemingway #2 line is closer to the new loads and existing lines where resources likely would  
2 integrate with the more built out network. The combination of Cedar Hill – Midpoint and Hemingway –  
3 Midpoint #2 is only approximately 8 miles longer than Cedar Hill – Hemingway. Therefore, the cost  
4 impact of the Gateway West sequencing change is limited. This selection of projects supports the  
5 NorthernGrid system for a 10-year future and is more efficient to build than the entire set of projects  
6 that comprise the BLMP.

## 7 Impacts on Neighboring Regions

8 There were no Material Adverse Impacts within neighboring regions identified for any of the projects  
9 evaluated.

## 10 Cost Allocation

11 The projects submitted for cost allocation consideration in the NorthernGrid region were not selected  
12 into the RTP. For this cycle, there are no projects that meet the criteria for cost allocation.

## 14 Conclusion

15 The NorthernGrid planning effort for the 2022-2023 cycle culminated in the identification of a regional  
16 plan that is more efficient than a plan composed of a simple concatenation of all the Members'  
17 proposed projects. The transmission needs of the NorthernGrid transmission system: loads, resources,  
18 and regional projects including expected transmission arrangements, were provided by the Members  
19 which collectively formed the basis for the Study Scope. There were no projects submitted for cost  
20 allocation consideration selected into the Regional Transmission Plan. NorthernGrid analyzed 112  
21 different power flow cases where each base case represented a selected hour combined with a selected  
22 set of transmission projects. Altogether, the set of transmission projects that resulted in a more  
23 efficient transmission system is that identified as regional combination 11.

## Appendix A: Definitions and Terms

Attachment K from NorthWestern Energy is provided here for reference to the process or definitions and can be accessed by double-clicking on the icon.

## Appendix B: Study Scope

The entire study scope for the 2022-2023 cycle can be accessed by double-clicking the icon below or by clicking on this link: [northerngrid.net/private-media/documents/NG\\_Study\\_Scope\\_2022-2023\\_Approved.pdf](https://northerngrid.net/private-media/documents/NG_Study_Scope_2022-2023_Approved.pdf)



## Study Scope for the 2022-2023 NorthernGrid Planning Cycle

*Member Planning Committee Approval Date: September 21, 2022*



## Appendix C: Rankings

Table 1: Voltage Class for Ranking

From	To	Rank
0 kV	50 kV	0.1
50 kV	100 kV	0.1
100 kV	200 kV	0.3
200 kV	300 kV	0.5
300 kV	400 kV	0.8
400 kV	1000 kV	1

Table 2: NERC TPL Category for Ranking

Category	Rank	Description
P0	1	All lines in service
P1	0.5	Single element loss results in single element outage
P2	0.1	Single element loss results in multiple element outage
P3	0.075	Loss of generator followed by system adjustments
P4	0.1	Stuck breaker results in multiple element outage
P5	0.1	Delayed fault clearing results in multiple element outage
P6	0.075	Loss of single element followed by system adjustments
P7	0.1	Multiple element loss results in multiple element outage

Table 3: Violations for Ranking

LV_Type	Rank	Description
Interface MW	0.5	Mild overload of path rating.
Interface MW	1	Heavy overload of path - potential stability problems.
Branch Amp	0.5	Mild overload of line.
Branch Amp	1	Heavy overload of line. Possibility of automated tripping.
Branch MVA	0.5	Mild overload.
Branch MVA	1	Heavy overload.

## Appendix D: Complete list of all RC combos

Table 4 Working version of the Regional Combinations Table

RC Name	BUMP	BNP	R01	R02	R03	R04	R05	R06	R07	R08	R09	R10	R11	R12	R13	R14	R15	R16	R17	R18	R19	R20	R21	R22	R23	R24	R25	R26
CCX			x									x		x		x											x	
B2H	x			x								x	x	x	x	x	x	x									x	
GWWD.3	x				x							x	x	x	x	x	x	x										
GWWD Phase 2	x											x																
GWWD Phase 1	x					x						x	x	x	x	x	x	x										
GWWD.1	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
GWS F	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
ON2	x						x					x							x		x	x	x			x		
GNLK N-W	x						x					x							x	x		x	x	x	x	x	x	
CrossTie									x			x							x	x	x	x		x	x	x		
SWIP-N										x		x			x	x			x	x	x	x			x			
Loco Falls												x																x
MATL	x										x	x						x										x
RobinsonPS									x	x		x			x	x			x	x	x	x	x	x	x			
ON1SC									x	x		x			x	x			x	x	x	x	x	x	x			

### Project Abbreviations

CCX – Cascade Renewable Transmission Project

B2H – Boardman to Hemingway Transmission Project

GWWD – Gateway West Transmission Project

D.3 Anticline to Populus

Phase 1 – Hemingway – Midpoint #2, Midpoint – Cedar Hill, Cedar Hill – Populus segments

Phase 2 – Hemingway – Cedar Hill, Midpoint – Borah 345 to 500 kV, Borah – Populus segments

D.1 Windstar to Aeolus 500 kV segment (under construction)

GWS F – Gateway South Transmission Project

ON2 – One Nevada “Online” Phase 2 Transmission Project

CrossTie – Cross-Tie Transmission Project

GNLK N-W – Green Link Northwest Transmission Project

SWIP-N – Southwest Intertie Project – North

MATL – Montana Alberta Transmission Line Upgrade Project

RobinsonPS – Robinson Summit Phase Angle Regulating Transformer “Phase Shifter” Project

ON1SC – One Nevada “Online” Phase 1 Series Compensation Addition

## Appendix F: NorthernGrid Contingencies

The entire list of contingencies analyzed can be accessed by double-clicking the icon below.

# Appendix G: Power Flow Case Summary

Table 5 Power Flow Case Load, Generation, and Path Transfer Summary

Base Case Name	Generation (MW)	Load* (MW)	West of Cascades -North (MW)	West of Cascades -South (MW)	Idaho-to-North-west (MW)	Borah West (MW)	Pacific DC Intertie (PDCI) (MW)	California-Oregon Intertie (COI) (MW)
32HS	61,539	57,308	4,209	3,984	-2,204	197	2,712	3,793
32HW	61,539	53,000	7,272	5,041	-890	364	-1500	901
32HW PCM	61,539	55,832	4,936	3,598	2851	3691	491	264
32LSP	31,603	35,151	4,057	2,682	901	756	-938	-2,728

\*Load: The NorthernGrid load represented in the table above may or may not reflect station service loads or third-party loads served by NorthernGrid members.



**From:** [Angelica Yocom](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** RE: PGE Clearcutting in Forest Park  
**Date:** Wednesday, December 4, 2024 5:02:14 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. I have worked as an educator through The Bird Alliance of Oregon since I moved to Portland and am in awe with the beauty of Forest Park. The summers there seem magical as we explore with kids the amazing ecosystem right on our city. Destroying any part would be detrimental to Forest Park itself but also the beauty of learning, engaging with, and magic of nature holds in this area for future students/campers.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Sincerely, a concerned and dedicated educator,  
Angelica Yocom

**From:** [Kathryn Lovett](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE's proposed land use permit  
**Date:** Wednesday, December 4, 2024 5:03:28 PM

---

Hello,

I am writing to urge Portland Permitting and Development to DENY the land use permit currently being sought by PGE for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the HRP would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming important bird, frog and other wildlife populations and impacting recreational areas popular to Portland residents. The proposed project would require the clearcutting of at least 5 acres of forest along the powerline corridor, including an area that provides crucial habitat for the endangered native Northern Red Legged Frog. These impacts are in direct conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility company claims that the project is needed for growing electricity demands due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from the aforementioned tech facilities.

I am STRONGLY opposed to this project due to its ecological and economic impacts on myself, other Portland residents and the wildlife that rely on the remaining habitat in its entirety. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. And they keep being sneaky about adding more and more acreage to their proposal which is unethical and super messed up.

Please REFUSE PGE's land use permit.

Thank you for your consideration.

Kathryn Lovett  
Multnomah County resident since 1993

**From:** [Stitch Goldberg](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny PGE's permit- Do not log Forest Park!  
**Date:** Wednesday, December 4, 2024 5:07:46 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts conflict with the Forest Park Natural Resource Management Plan.

This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands. The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

As a Portland resident for more than 20 years, invested in the health of our region, I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Lo Goldberg  
3306 NE 92nd Ave.  
Portland, OR 97220



**From:** [Sona](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment: Please deny the PGE Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 5:16:03 PM

---

Hello,

My name is Sona Sridharan, I live at 2416 NW Pinnacle Dr, Portland, OR 97229. I am writing to strongly urge Portland Permitting and Development **to deny** the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. I have lived in Forest Park my whole life and have seen the gutting of Portland's greatest gem and real tourist draw. Disregarding the ecological preservation of Forest Park, the city of Portland is showing ignorance of the current climate crisis. As a young person, I am deeply concerned with PGE's proposal and how the city responds. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration and time,  
Sona Sridharan

**From:** [Anna Steckel](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment: Defend Forest Park  
**Date:** Wednesday, December 4, 2024 5:21:45 PM

---

Hello,

I have lived in Portland nearly my entire life--east and west sides of the city. Forest Park is a hallmark of this city, as is the nature and wildlife within it. I urge you to hold the values of this city close and kindly ask that the Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Best,  
Anna Steckel

**From:** [Barak Goodman](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Stop PGE from destroying our beautiful Forest Park  
**Date:** Wednesday, December 4, 2024 5:22:57 PM

---

Hi,

I'm reaching out today to express my deep concern against the clear cutting of Forest Park. Aside from the endless environmental concerns which I'm sure you are aware of such as loss in drainage areas and destroyed habitats, I believe it is a part of our city we cannot lose. I spent countless afternoons as a kid running through the trails and exploring with my dad. It's a place I always take visitors and Portland wouldn't be Portland without. PLEASE STOP THESE CRIMINALS! This is a real life Fern Gully situation and you have the power to stop the evil monster. Please don't let us down.

A forest loving Portlander,

Barak

**From:** [briita faeru wren](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** defend forest park  
**Date:** Wednesday, December 4, 2024 5:23:38 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents and all of earth. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.



**From:** [julia barbee](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend forest park  
**Date:** Wednesday, December 4, 2024 5:25:02 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Audrey Ann](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Wednesday, December 4, 2024 5:26:50 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Rebecca Buddington](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** STOP PGE  
**Date:** Wednesday, December 4, 2024 5:27:57 PM

---

Dear Ms. Steele & Ms. Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. There are non-park options that should instead be proposed. Thank you for your consideration.

Sincerely,  
Rebecca Buddington

Mother, Nurse Practitioner  
2836 SE 71st Ave, Portland, OR 97206  
831-295-4366

**From:** [Miranda Todd](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** DENY PGE LAND USE PERMIT REQUEST  
**Date:** Wednesday, December 4, 2024 5:37:30 PM

---

Hi!

My name is Miranda, and I am a Milwaukie resident who lived in Portland for many years. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Do this not only for us, but for those occupying the land to come. We can work on this scale to protect our planet.

Best, Miranda

**From:** [Herbsong Acupuncture](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment regarding PGE Forest Park proposal  
**Date:** Wednesday, December 4, 2024 5:38:20 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Vera Brink

**From:** [Helen Meigs](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment against clear cutting in forest park  
**Date:** Wednesday, December 4, 2024 5:38:38 PM

---

Hello,

I am writing today to plead that Portland Permitting and Development deny the land use permit being sought by Portland General Electric for the "Harborton Reliability Project."

As a life-long Portlander, I find Forest Park to be a refuge and a jewel of this city. For me, the northern end of the park, the site of the proposed expansion, is especially precious. I have hiked firelane 15 countless times. It gives me great solace to watch the seasons change, to watch the plants go through their life cycle and find quiet deep in the woods. To clear cut this land would be a travesty that we, as a city, cannot allow.

I urge you to think of the long-term future of our environment and our city and deny this permit.

Thank you,  
Helen Meigs  
(503) 432-5514  
[Helen.g.meigs@gmail.com](mailto:Helen.g.meigs@gmail.com)  
3633 SE Tenino St. Portland Or 97202

**From:** [Alyssa Baldwin](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project Concern  
**Date:** Wednesday, December 4, 2024 5:48:18 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Megan Bolten](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** NO PGE DEVELOPMENT IN FOREST PARK  
**Date:** Wednesday, December 4, 2024 5:53:43 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit



**From:** [Nita Sridharan](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Regarding PGE expansion into Forest Park  
**Date:** Wednesday, December 4, 2024 5:55:03 PM

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Dear Ms Steele and Ms Caruso,

I am writing in regards to the considerations made to allow PGE park to cut down 15 acres of Forest Park for the Harborton Reliability Project. The Forest Park Conservancy stated that “PGE’s revised land-use application filed with the City of Portland proposes to clear cut 4.7 acres of 150+ year old Douglas fir and bigleaf maple trees and proposes to remove 5 white oak trees estimated to be 170-500 years old. In total, the proposal includes the removal of 376 living trees, and 21 dead trees. It will permanently fill at least two wetlands and disrupts two streams that support multiple species of aquatic wildlife.”

I grew up in this incredible forest & believe that Portland would not be the city it is without it. Please do what you can to protect the forest, all beings who live in and rely on this ecosystem, and everyone who treasures it.

Please consider reading this article by the Forest Park Conservancy regarding this project.

<https://forestparkconservancy.org/pges-harborton-reliability-project-would-result-in-an-irreplaceable-loss-for-the-people-of-the-region/>

Thank you so much for your time and consideration.

Sincerely,  
Nita Sridharan

**From:** [Jane Hartline](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Expansion in Forest Park  
**Date:** Wednesday, December 4, 2024 5:55:19 PM

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I am absolutely horrified that clearcutting in Forest Park is even being considered. As one of the team leaders who has volunteered hundreds of hours for a four month period for the last 10 years, I can't believe this assault the the frog's territory is even being considered. Haven't we humans already done enough to make things nearly impossible for this species?

-----  
Jane Hartline

## **Lost Lagoon Farm**

Sauvie Island, Oregon  
[sauviejane@gmail.com](mailto:sauviejane@gmail.com)

**From:** [Chelsea Biagioli](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment  
**Date:** Wednesday, December 4, 2024 5:57:30 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Chelsea Biagioli  
Portland resident 97220

**From:** [Lily Perkins](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Leave Forest Park ALONE  
**Date:** Wednesday, December 4, 2024 5:58:16 PM

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Hi,

My name is Lily Perkins and I have lived in Portland Oregon my whole life. Forest park is truly one of the best places in our city. To allow PGE to use this land would be a travesty. Accepting this land use permit would be a huge mistake and Portlanders will not forget the harm caused by this project. I am urging you to make the right decision. Intel and PGE are not representatives of this city.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Act with morals,  
Lily Perkins

**From:** [Mars Hogue](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project powerline expansion  
**Date:** Wednesday, December 4, 2024 5:59:42 PM

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I am a Portland resident writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands. The rich diversity of this forest is critical habitat to the Northern Red-Legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern. Future phases of the project could disrupt salmon habitat in the Miller Creek watershed. Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in the existing clearcuts, which poses a threat to the local ecology and increases wildfire risk. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

As a Portland resident, Forest Park is one of the things I love most about this city, and I will not stand back and watch it be destroyed. Thousands of us are afraid for our beloved park, one of the most important ecological sites in our city.

Please refuse PGE’s land use permit. Thank you for your consideration.

Mars Hogue

**From:** [rebecca teasdale](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment about PGE's proposed land use permit  
**Date:** Wednesday, December 4, 2024 6:00:02 PM

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Hello,

I am writing to urge Portland Permitting and Development to DENY the land use permit currently being sought by PGE for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the HRP would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming important bird, frog and other wildlife populations and impacting recreational areas popular to Portland residents. The proposed project would require the clearcutting of at least 5 acres of forest along the powerline corridor, including an area that provides crucial habitat for the endangered native Northern Red Legged Frog. These impacts are in direct conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility company claims that the project is needed for growing electricity demands due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from the aforementioned tech facilities.

I am STRONGLY opposed to this project due to its ecological and economic impacts on myself, other Portland residents and the wildlife that rely on the remaining habitat in its entirety. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. And they keep being sneaky about adding more and more acreage to their proposal which is unethical and super messed up.

Please REFUSE PGE's land use permit.

Thank you for your consideration.

Rebecca Teasdale  
Multnomah County resident since 1956

**From:** [Scott Huthmacher](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project public comment  
**Date:** Wednesday, December 4, 2024 6:00:23 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration,  
Scott Huthmacher, Portland resident

**From:** [Kate Andrews](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 6:02:29 PM

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Dear Morgan Steele & Christine Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Forest Park is one of Portland’s crown jewels and should be protected.

Thank you for your consideration.

Kate Andrews  
Portland native, homeowner, & small business owner



**From:** [Emily Mercer](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Power Line Expansion  
**Date:** Wednesday, December 4, 2024 6:03:59 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the **Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.**

**The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.**

**Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.**

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.**

Emily Mercer

**From:** [alison.mh@tutanota.com](mailto:alison.mh@tutanota.com)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 6:07:57 PM

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Hello,

I am writing to ask that the Portland Permitting and Development committee resolutely deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

As I understand it, several miles of Forest Park would be clear-cut if this project is allowed to happen. This is unacceptable and must not be allowed to transpire. Not only do I object because I'm a person who likes to explore Forest Park and cares about protecting the natural environment as much as we can for enjoyment, but it is vital we do not chop down mature and old growth trees for the health of our communities and the planet. This would negatively impact birds, wildlife (including at-risk Northern Red Legged Frogs), and obviously the plants. Additionally, we lose the natural carbon sequestration found in trees and risk poorer air quality.

I find this antithetical to Portland's sustainability related goals and the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. Worse yet, approval of this project could set a precedent for further development in Forest Park. Once again, this is unacceptable.

- 
- Please reject PGE's proposal.
- 
- Thank you for reading,
- --Alison Mortensen-Hayes

**From:** [b.maresh@proton.me](mailto:b.maresh@proton.me)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment on the Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 6:11:58 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric for the “Harborton Reliability Project” powerline expansion.

I’ll keep it simple: this project will harm the people of Portland and the flora and fauna that live in Forest Park, while Intel makes a profit off of our suffering. Portland is a rapidly gentrifying city with a decades long housing crisis. I’ve fought tooth and nail to be housed, to stay housed, to keep my loved ones housed, while working for near minimum wage as a caregiver. Approval of this project is approval of Intel’s expansion, which necessitates the displacement of the poor and working class to make way for more desirable, higher wage tech workers. Those tech workers still need someone to make their overpriced coffees, serve their vegan farm-to-table lunch, and wipe their entitled children’s snotty noses, but where will we be after they push us out of our homes?

We all know that PGE won’t stop at a measly five acres of clear cut, despite the tremendous loss of biodiversity and the unpredictable consequences on our water table that always accompany clear cut projects. There is already a proposal to continue the clear cut into an additional 15 acres of Forest Park. This section of forest is home to the northern red-legged frog, an at-risk species, and mature forest stands. Mature forest stands are critical for the sequestering of carbon, especially in areas with high pollution. No amount of newly planted trees can replace the need for mature stands. I want to point out that we’ve already seen the effects of destroying our urban carbon sinks: the destruction of the Weelaunee Forest to build Cop City in Atlanta preceded the most damaging hurricane to ever hit the state of Georgia, with 34 people documented killed throughout the state and an estimated \$6 billion of damage to agriculture alone.

In our current state of climate collapse, it would be beyond negligible to the people and the wildlife who call this area home to permit corporate expansion at the cost of our wellbeing. I am strongly opposed to this project due to its ecological and economical impacts on myself and my community. PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit, and thank you for your consideration.

Bird Maresh  
Lifelong Portland Resident

**From:** [Alli Davis](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment: In Defense of Forest Park  
**Date:** Wednesday, December 4, 2024 6:14:42 PM

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Hello Morgan and Christine,

I strongly urge the Portland Permitting and Development to not approve the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The deforestation of at least five acres of forest impacts the delicate habitat for the Northern Red Legged Frog.

Additionally, the park has significant meaning to me personally as I bring my aging grandmother there once per month and the green space has a huge positive impact on her health. The well being of the entire ecosystem has a special meaning to her and I and it’s devastating that the permitting department might approve this project.

Also, this project will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,

Alli Davis  
503-686-1360

**From:** [SamyUltron](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Stop deforestation  
**Date:** Wednesday, December 4, 2024 6:18:39 PM

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Stop deforestation!

**From:** [alice\\_west@icloud.com](mailto:alice_west@icloud.com)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** Protect Forest Park  
**Date:** Wednesday, December 4, 2024 6:21:31 PM

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Dear city officials,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

I am a lifelong Portland resident raising two children here. Please protect the forest for all of our futures.

Sincerely,  
Alice West

Sent from my phone

**From:** [Stuart Sandler](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Wednesday, December 4, 2024 6:21:47 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Stuart Sandler  
NW Portland resident

**From:** [Rodney Jensen](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public Comment: PGE's Land Use Permit  
**Date:** Wednesday, December 4, 2024 6:30:08 PM

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Hello Morgan and Christine,

Please deny the land use permit requested by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

The deforestation of at least five acres of forest negatively impacts the habitat for the Northern Red Legged Frog and the benefits to Portland residents that the park provides.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Regards,

Rodney Jensen

5034319673



**From:** [Madeleine Dodge](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park!  
**Date:** Wednesday, December 4, 2024 6:30:29 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Madeleine Dodge, Portland resident

**From:** [Delphina](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 6:32:36 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Delphina KP

A former long-time and soon-to-be returning Portland resident who cares deeply about the city and its beautiful surroundings.

**From:** [norris meigs](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny the Harborton Reliability Project!!  
**Date:** Wednesday, December 4, 2024 6:39:45 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Sam Cole](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PLEASE DEFEND FORREST PARK  
**Date:** Wednesday, December 4, 2024 6:39:54 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Cole Cole

**From:** [shalene.murphy](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** Defend forest park  
**Date:** Wednesday, December 4, 2024 6:41:30 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Shalene Murphy St Johns resident and Forest Park Lover.

Sent from [Outlook](#)

**From:** [Whitney Hoffman](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition to powerline expansion  
**Date:** Wednesday, December 4, 2024 6:42:21 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Whitney Hoffman, concerned citizen of Portland

**From:** [Ema Erikson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project Public Comment  
**Date:** Wednesday, December 4, 2024 6:49:52 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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Best

Ema Erikson (Central Eastside Portland Resident)

**From:** [Katie Timzen](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** PGE and Forest Park  
**Date:** Wednesday, December 4, 2024 7:09:02 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.



**From:** [Parker Ediger](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Do not allow PGE to clear-cut Forest Park  
**Date:** Wednesday, December 4, 2024 7:09:40 PM

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To whom it may concern;

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

If approved, this next phase of the project would clear-cut 5 acres of forest habitat that is critical for red-legged frogs and other protected species, while paving the way for PGE to continue clear-cutting over 15 additional acres in Forest Park. This section of forest is adjacent to the Harborton frog crossing and contains riparian habitat, heritage oaks, and mature forest stands. The rich diversity of this forest is critical habitat to the northern red-legged frog, which is listed by the state as a sensitive species and by the federal government as a species of concern. Future phases of the project could disrupt salmon habitat in the Miller Creek watershed. Additionally, expansion of the powerline corridor threatens to exacerbate the spread of invasive species present in the existing clearcuts, which poses a threat to the local ecology and increases wildfire risk.

This project is not for supporting energy needs of local communities, as PGE claims, but for supporting large tech companies like Intel on residential ratepayers’ dime. PGE is focused on expanding transmission and energy generation infrastructure to meet the demand of rapidly growing industrial facilities, such as Intel’s new \$36 billion chip-making plant in Hillsboro, which would consume roughly as much electricity as 50,000 homes. According to PGE’s schedule for load growth change, residential demand is projected to increase by only 3.5% between 2016-2025. Heavy industrial demand, on the other hand, has a projected increase of almost 150%. PGE has repeatedly raised energy costs for ratepayers while subsidizing energy costs for large tech industry facilities in Washington County’s Silicon Forest.

I am strongly opposed to this project due to its ecological and economic impacts on myself

and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

-Parker Ediger  
Portland, OR 97214

**From:** [Linzie Reynolds Vanwieringen](#)  
**To:** [Caruso, Christine](#)  
**Cc:** [Steele, Morgan](#)  
**Subject:** Defending Forest Park | Don't let PGE Ruin Our Park  
**Date:** Wednesday, December 4, 2024 7:18:36 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

[Linzie Reynolds Vanwieringen](#)  
(503) 680-2771  
[Linzie.r.vanwieringen@gmail.com](mailto:Linzie.r.vanwieringen@gmail.com)

**From:** [Cassie Mansfield](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Don't let PGE clearcut forest park or I will kill myself!!!  
**Date:** Wednesday, December 4, 2024 7:25:12 PM

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With the state of the world as it is, it is unimaginable to me that my city would choose to cause harm to our beloved forest park. Forest park is a precious treasure that needs to be protected. Knowing that we have lost 70% of our biodiversity since the 1970's, and seeing that our government would choose to continue this trend, genuinely makes me want to kill myself. I cannot imagine how people can be so evil. I don't want to live in a world like that. If you allow PGE to go through with this tragedy, it could be a public health disaster, as I know many people who feel the same. You would be contributing to human and environmental suffering. Please help to protect forest park <3 I believe in your humanity, and I know you will do the right thing :)  
Thank you so much <3

**From:** [Rebecca Delgado](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park  
**Date:** Wednesday, December 4, 2024 7:27:20 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Rebecca (Portland resident, Forest Park aficionado)

**From:** [Cade Anslem](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment on PGE transmission expansion in Forest Park / LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 7:28:08 PM

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Hello!

I am writing as a Portland resident to voice a strong disapproval of PGE's plan to expand transmission lines in Forest Park. While strengthening our power grid is important in an era of increasing climate volatility, reducing the factors that create that volatility in the first place is even more crucial, and every acre of dense green space cut down is a step back toward a more dangerous world for us and coming generations.

If hearsay holds true and PGE's primary gain in this expansion is supporting further buildout of Intel – a company with a local base not even located in the city that would suffer as a result of this decision – then approving the expansion goes from unwise to unconscionable. Put simply, this would be a decision made at the expense of the public for the enrichment of the private, a complete refutation of what it means to be a public servant in the first place.

Even taking PGE at face value, approving this would lead to an irreparable loss in one of Portland's natural spaces, which is hardly a best case scenario. Considering PGE's rate increases have been so severe as to warrant investigation from a state senator, I'd like to think they can afford to go back to the drawing board on this one. Forest Park cannot.

While I understand that many other forms of development in this parcel go without public hearings, I believe this is an excellent case of exceptions to the NRMP's rules being in place for good reason. Please do not approve this permit.

Thank you for your time.  
- Cade Anslem

**From:** [Mari Shepard-Glenn](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 7:30:30 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration

Sincerely,

Mari Shepard-Glenn

**From:** [Caleb Bishop](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** public comment on Forest Park cuts  
**Date:** Wednesday, December 4, 2024 7:37:18 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

The project fails to comply with the Forest Park Natural Resources Management Plan's goals to allow growth into ancient forest and to preserve habitat.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

Please refuse PGE's land permit. They can build somewhere already ecologically desolate.

There is no economic incentive that overpowers the ecological value of the trees that steward our water and air.



**From:** [Jamie Bluhm](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Protect Forest Park  
**Date:** Wednesday, December 4, 2024 7:47:07 PM

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Clear cutting and deforestation of Forest Park simply cannot happen. This is a one of a kind resource in our city, and I depend on it daily for mental health. The way this would affect our ecosystem and the landscape of the city is unimaginable. The fact that this is even being considered as unthinkable. Please do something. Please do the right thing.

Sincerely,

Jamie Bluhm

Get [Outlook for iOS](#)

**From:** [kym condron](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** protect Forest Park please!  
**Date:** Wednesday, December 4, 2024 7:55:54 PM

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To Morgan and Christine, with appreciation for your attention:

Thanks for reading and listening to public opinion.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Kym Condron-Lee  
Teacher

**From:** [Peter Q](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE Forest Park Public Comment  
**Date:** Wednesday, December 4, 2024 8:26:47 PM

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To whom it may concern -

I am writing to urge Portland Permitting and Development to **deny** the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. PLEASE refuse PGE’s land use permit. Thank you for your consideration.

Peter Quattromani  
Portland Resident And Active Recreational User of Forest Park

**From:** [J.G](#)  
**Cc:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny land use permit for Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 8:38:00 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.  
Jeremiah Graff

**From:** [Ben de Moura](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Harborton reliability project  
**Date:** Wednesday, December 4, 2024 8:57:07 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan.

I really love Forest Park, I’ve been going there regularly for over ten years. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Sophie Richards](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Against the PGE land permit  
**Date:** Wednesday, December 4, 2024 9:02:12 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you,  
Sophie Richards  
Portland resident

**From:** [emma freedman](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Denying PGE's land use permit  
**Date:** Wednesday, December 4, 2024 9:13:05 PM

---

Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Emma Freedman,  
Portland resident

**From:** [ladridibiciclette@yahoo.com](mailto:ladridibiciclette@yahoo.com)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 9:27:22 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.



**From:** [Tess O'Halloran](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** DEFEND FOREST PARK <3  
**Date:** Wednesday, December 4, 2024 9:28:36 PM

---

Hello!

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration,

Tess O’Halloran (Portland Resident)

971-678-4574

**From:** [Alana Koscove](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project Public Comment  
**Date:** Wednesday, December 4, 2024 9:30:57 PM

---

Hi Ms. Steele and Ms. Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

I have a longstanding relationship with Forest Park and go there to reset, build relationships with the plants there, and harvest medicinals. Living in Northwest, I go quite frequently, walking to it from my house or exploring its many trails. To remove some the trees, our relatives, is destructive for the climate and for Portland residents’ green spaces in the city.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Alana Koscove  
Northwest Portland resident

**From:** [Bala](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public comment on PGE's Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 9:34:36 PM

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Hello,

I'm writing to register my opposition to PGE's proposed project that would end up clear-cutting five acres of Forest Park.

An urban forested area like Forest Park is a rarity among cities of Portland's size. Maintaining it pristine for so long, despite the massive development in other parts of Portland, goes to previous generations who saw the importance of having such a greenery and took actions to preserve it.

Our responsibility is to hand this precious greenspace to the next generations without damaging its character.

We would fail in this responsibility if we go ahead with PGE's project and shorten the greenspace of Forest Park.

Furthermore, I come to understand that the proposed expansion is to serve industrial customers and not for residential ones, and additionally, that the project proposal fails to comply with the Forest Park Natural Resources Management Plan.

For these reasons, I request you to please deny the permit for this project.

Thank you  
Bala Seshasayee

**From:** [blairgalen@gmail.com](mailto:blairgalen@gmail.com)  
**To:** [Caruso, Christine](#)  
**Subject:** Public comment for Forest Park  
**Date:** Wednesday, December 4, 2024 9:36:51 PM

---

Hello,

My name is Galen and I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts for all of those who inhabit the area. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

While I currently reside in Corvallis, I feel a deep connection to the beautiful land of Forest Park and make a point to visit whenever I am in Portland. It would be devastating on many levels to have this clear cutting go through.

Thank you for your time.

Best,  
Galen

**From:** [San R](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Destroying our Lifeline for \$\$\$  
**Date:** Wednesday, December 4, 2024 9:41:00 PM

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Dear Christine Caruso,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

In light of the last several years of extreme heat and extreme fires, I do not understand how anyone can in their right mind think that cutting trees is a good idea. We should be planting trees and creating urban canopies and shading clear cuts. Clear cuts should not be permitted. We can use thinning and fire to manage forest, but not out right cutting down all that is green. Unless of course our goal is desertification.

We cannot be using the same hammer and expect different results.

The Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming birds and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

AI's needs for energy are not sustainable. We have to remember that Earth holds and allows everything. She is already showing us signs of, "Enough!" We need to make a choice here who are going to support. And are we going to keep sawing a branch on which we sit in the name of endless profits that at this point none of us seeing. I am working 4 jobs and volunteer at 5th, and I have been on the brink of homelessness 3 times in the last year. I am 55 year old!

Wake up! Stop catering to businesses that bring nothing but devastation.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to

comply with the Forest Park Natural Resources Management Plan.

Please refuse PGE's land use permit. Thank you for your consideration

Sanela Ruznic  
2524 NW Savier Street #1  
Portland, OR 97210

**From:** [Mary Lytle](#)  
**To:** [Caruso, Christine](#)  
**Subject:** FP  
**Date:** Wednesday, December 4, 2024 9:48:45 PM

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Hello Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Mary



**Illustration | Design | Animation**

[www.maryroselytle.com](http://www.maryroselytle.com) | @maryroselytleart  
(she/they) | [lytlemr@gmail.com](mailto:lytlemr@gmail.com) | (513) 293-4335

**Radical Adventure Riders**

[radicaladventureriders.com](http://radicaladventureriders.com) | [@radical.adventure.riders](https://www.instagram.com/radical.adventure.riders)

#radicaladventureriders #getradberadical #shredthepatriarchy





**From:** [laura.campbell](#)  
**To:** [Caruso, Christine](#)  
**Subject:** No Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 9:51:28 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Laura Adams](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public Comment: Harborton Reliability Project- powerline expansion  
**Date:** Wednesday, December 4, 2024 10:13:40 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Best,  
Laura Adams

**From:** [Sam](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public Comment: Harborton Reliability Project- powerline expansion  
**Date:** Wednesday, December 4, 2024 10:22:52 PM

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Hello,

>

> I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

>

> The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

>

> Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

>

> I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

>

> Best,  
Sam Inoue-Alexander

**From:** [Julien Roohani](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** First Park  
**Date:** Wednesday, December 4, 2024 10:31:42 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Mercedes Klein](#)  
**To:** [Caruso, Christine](#)  
**Subject:** I care about Forest Park  
**Date:** Wednesday, December 4, 2024 10:36:54 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Mercedes

Please note: I live in Portland.

Sent from my iPhone

**From:** [Lamar Caston](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Wednesday, December 4, 2024 9:54:41 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is

clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you,  
Stephen

**From:** [rel friedman](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Keep Forest Park whole please  
**Date:** Wednesday, December 4, 2024 9:58:23 PM

---

Hi there Christine,  
I'm strongly urging Portland Permitting and Development to deny the land use permit that Portland General Electric (PGE) is looking to obtain for the "Harborton Reliability Project" power line expansion. As the City previously noted, the Harborton Reliability Project would cause major impacts to Forest Park + the surrounding ecosystem, undermining Forest Park's management goals, harming birds + other wildlife populations, + impacting recreational areas popular to Portland residents + tourists alike. I just saw a tourism ad that was all about Forest Park <3. I am also currently reading a book about the possibility that plants + trees are intelligent beings, just like our housepets + animals.

The PGE project requires clearcutting at least 5 acres of Forest Park along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are completely against the Forest Park Natural Resource Management Plan. I hope that you are not forgetting or ignoring them.

On top of that, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. (And Intel is scheduling lots of layoffs at the moment.) While the electric company claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological + economic impacts on myself + other Portland residents + potential tourists. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your time + consideration.  
Rel Friedman, user of Forest Park



**From:** [petrina.gee](mailto:petrina.gee)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park Clearcut  
**Date:** Wednesday, December 4, 2024 10:06:27 PM

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I strongly oppose the clearcutting in Forest Park as proposed by Portland General Electric. This project will cause significant impacts to the natural ecosystem. Additionally, the project area is critical habitat for the northern red legged frog, a federally listed species of concern.

Please deny this permit and consider other routes outside of Forest Park.

Thank you

Petrina Gee  
Frog Shuttle Volunteer

Sent from my Galaxy

**From:** [bayleylaurie@gmail.com](mailto:bayleylaurie@gmail.com)  
**To:** [Caruso, Christine](#)  
**Subject:** Lines in the forest - Public comment on PGE/Forest Park  
**Date:** Wednesday, December 4, 2024 10:38:06 PM

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Friend,

I'm writing to ask you to support Portland Permitting and Development in denying the land use permit currently being sought by PGE for the Harborton Reliability Project.

So often I think of my luck that I live in a city whose edges blend into trees and creeks and mosses and soil that support frogs and insects and wildlife that has otherwise been decimated.

We have so little left to hope for these days, and our blessings can seem thin in the face of climate change and wars. The power of nature to restore us and provide for us is a source we are cutting into at alarming rates.

Let us not kill ourselves to provide for profit. Let us protect the irreplaceable gift of our little wild park in our town—one of the only spaces we can protect anything, exercise any power at all.

I hope you'll listen to your citizens whose hearts beat for this landscape.

Thank you for your time,  
Bayley Sprowl  
Resident of NE Portland

**From:** [andre.abassi](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Cc:** [Kiely Smith](#)  
**Subject:** Opposition to Portland General Electric's Harborton Reliability Project Land Use Permit Application  
**Date:** Wednesday, December 4, 2024 10:47:08 PM

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Dear Morgan Steele and Christine Caruso,

As Executive Director of the Society for the Protection of Insects and a Portland resident, I strongly urge Portland Permitting and Development to deny the land use permit for Portland General Electric's proposed Harborton Reliability Project power line expansion in Forest Park.

The proposed project would have severe and irreversible impacts on critical wildlife habitat, directly conflicting with Forest Park's Natural Resource Management Plan. The initial phase requiring 5 acres of forest clear-cutting would significantly impact the imperiled Northern Red-Legged Frog and countless insect species that are fundamental to forest ecosystem health.

As a conservation professional focused on insect populations, I must emphasize that we are currently experiencing an unprecedented mass extinction event. The proposed power line expansion would intrude upon and fragment vital habitat as well as disrupt essential ecological processes that depend on our native insect communities. In addition to their intrinsic value, these insects serve crucial roles in pollination, decomposition, and as food sources for other wildlife.

The project's subsequent phases, which would impact an additional 15 acres, poses even greater threats to multiple sensitive species, including:

- Endangered salmon populations
- Additional amphibian species
- Diverse insect communities essential to forest health

Furthermore, the creation of this power line corridor would likely facilitate the introduction and spread of invasive species, posing additional threats to our native flora and fauna. This would undermine decades of careful forest management and conservation efforts in Forest Park.

Given these significant environmental concerns and the project's clear contradiction of established management plans, I strongly urge you to deny this permit application. The ecological integrity of Forest Park and the survival of its sensitive species must take precedence over this infrastructure expansion.

Respectfully submitted,

Andre C. Abassi

Executive Director

Society for the Protection of Insects

**From:** [Tucker Shaw](#)  
**To:** [Tucker Shaw](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** Please let forest park be a healthy forest  
**Date:** Wednesday, December 4, 2024 10:48:48 PM

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Ps

I am a portland resident and absolutely love forest park, as well as this city! As a carpenter, and hiker, I have great admiration for good forest management and reverie the natural world.

Tucker Shaw

Sent from my iPhone

> On Dec 4, 2024, at 10:44 PM, Tucker Shaw <permaculturetuck@gmail.com> wrote:

>

> Good evening Christine,

> I am getting in touch with you, to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion.

>

> This scale of clearcutting to forest park would be devastating for the wildlife and us Portlanders who spend time in forest park.

>

> As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

>

> The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

>

> Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

>

> I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

>

> Tucker Shaw

**From:** [Jordan DeLawder](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Public comment: Deny PGE's land use permit  
**Date:** Wednesday, December 4, 2024 10:54:16 PM

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Hello,

My name is Jordan DeLawder. I live in Portland and work as a conservation planner. I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**Jordan DeLawder**  
[www.jordandelawder.com](http://www.jordandelawder.com)  
(301) 639-4568

**From:** [Mitchell Dasteel](#)  
**To:** [Caruso, Christine](#)  
**Subject:** No PGE clearcutting!  
**Date:** Wednesday, December 4, 2024 10:57:57 PM

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### **Draft Public Comment:**

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Mitchell Dasteel  
12/4/24  
Sent from my iPhone

**From:** [Regan Goodrich](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park !  
**Date:** Wednesday, December 4, 2024 11:07:34 PM

---

To whom it concerns,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clear cutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Regan Goodrich

**From:** [Zachary Horn](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Defend Forest Park!  
**Date:** Wednesday, December 4, 2024 11:18:26 PM

---

To whom it concerns,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clear cutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,  
Zachary Horn



**From:** [April Long](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** DENY PGE LAND USE PERMIT  
**Date:** Wednesday, December 4, 2024 11:27:27 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

This is so wildly fucking stupid I cannot even believe I have to send an email about it. Are you fucking kidding me. Please do not support clear-cutting Forest Park for a genocide supporting corporation. Thank you for your consideration.

April Long  
North Portland resident

**From:** [Julia Fritz-Endres](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Deny the Land Use Permit for PGE's Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 11:48:44 PM

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Portland Permitting and Development,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Julia Fritz-Endres  
Portland resident

**From:** [AJ Amr](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Harborton reliability project  
**Date:** Thursday, December 5, 2024 8:14:37 AM

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Forest Park is our commons, not big businesses property.  
I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Joe Martinez  
NE Portland resident

**From:** [Han](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [Caruso, Christine](#)  
**Subject:** Public comment on PGE forest park project  
**Date:** Thursday, December 5, 2024 8:31:41 AM

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Hi Morgan and Christine,

I am a Portland resident and apCC environmental sciences student who loves and spends so much time in the beautiful forest park and I am very concerned with the idea of losing any part of our precious protected public lands that are already so few.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Han Divine

**From:** [Gaby West](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park PGE Statement  
**Date:** Thursday, December 5, 2024 9:14:21 AM

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I'm sure y'all will get a lot of the pasted statement below, but also please take to heart that as government workers you have power to shape Portland in a way that most cities are too far gone to be. Corporate Interests cannot come at the expense of natural spaces, they have enough of our planet, our money, our power- in a world trending towards greed let's be different. Please.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Ezme Fern](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Do not clear cut Forest Park trees  
**Date:** Thursday, December 5, 2024 10:11:42 AM

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Hello Morgan and Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Regards,  
Ezme Fern

**From:** [Brennan Facchino](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Comment on Harborton Reliability Project  
**Date:** Thursday, December 5, 2024 11:14:23 AM

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Hello Christine,

It's been shown many times that PGE is a company that cares more about profits than the community it serves. I wanted to send a dissenting voice against the project that would clear cut five acres in Forest Park to benefit giant tech corporations in the suburbs.

**I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.**

**The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.**

**Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.**

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.**

**I sincerely hope this does not fall on deaf ears.**

**A concerned Portland resident,**

**Brennan Facchino**

Sent from my iPhone

**From:** [Georgia Kirkpatrick](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Thursday, December 5, 2024 1:57:41 PM

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Please deny the land permit to "Harborton Reliability Project". Save Forest Park.

Thank you,  
Georgia Kirkpatrick



**From:** [jamshed patel](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Thursday, December 5, 2024 2:08:18 PM

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Dear Christine,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Good wishes,

Jamshed

**From:** [Audrey Harper](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest park  
**Date:** Thursday, December 5, 2024 2:34:32 PM

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Please don't cut down our trees!! Please please please preserve our wonderful forest that makes Portland such a magical place! This project is a very bad idea! I am very opposed to it! Thank you very much for your consideration and I hope you do the right thing by protecting our wonderful and gorgeous forest and its wildlife

Thank you!  
Audrey Harper

(Please don't cut down trees!)

**From:** [Bella Hopewell](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Opposition of the Harborton Reliability Project  
**Date:** Thursday, December 5, 2024 2:45:51 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration,  
Bella  
Portland Resident

**From:** [Emily Brock](#)  
**To:** [Caruso, Christine](#)  
**Subject:** Please say no to PGE land use permit  
**Date:** Thursday, December 5, 2024 3:01:46 PM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Thank you for your consideration.

Emily Brock, resident of NW Portland

**From:** [Zane Ingersoll](#)  
**To:** [Caruso, Christine](#)  
**Subject:** PGE Forest Park expansion  
**Date:** Thursday, December 5, 2024 3:40:01 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan. Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities. I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Scott Ingersoll  
4816 SE 50th Ave  
Portland, Or 97206

**From:** [Bethany Thornton](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park  
**Date:** Thursday, December 5, 2024 8:04:35 PM

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Hi Morgan and Christine,

I am a little late in sending this, but this park means so much to my sister who lives in Portland, and I want to stand up for this precious resource.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit.

Thank you for your consideration,  
Bethany Thornton

**From:** [Renee Sills](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Don't ruin forest park  
**Date:** Thursday, December 5, 2024 8:35:35 PM

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The copy/paste text is below and I agree with it all. I'm writing a personal note to say please don't approve this. Don't let PGE ruin one of the best things about Portland.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

**From:** [Karina Ortiz](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE  
**Date:** Thursday, December 5, 2024 9:26:03 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

[Sent from Yahoo Mail for iPhone](#)



**From:** [Emily Armstrong](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Forest Park clear cut  
**Date:** Friday, December 6, 2024 10:17:12 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

Thank you for your consideration,  
Emily

**From:** [Linda H](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Harborton Reliability Project  
**Date:** Friday, December 6, 2024 5:35:45 PM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit. Thank you for your consideration.

Very sincerely,

Linda Huang  
232 NW Uptown Terrace APT 2B, Portland, OR 97210

**From:** [LA Born](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** PGE clear cutting Forest Park  
**Date:** Saturday, December 7, 2024 7:32:02 AM

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Dear Morgan and Christine,

I just learned of PGE's proposal to clear cut parts of Forest Park to support energy production for large corporations like Intel. I can't believe this is even up for debate, especially in the green city of Portland, Oregon that prides itself on supporting trees and the environment.

The city should not allow PGE to do this. Period. There is no cogent argument to allow it. We need to preserve our trees and green spaces, especially now. Please use my letter documentation to support opposition to this terrible plan by PGE.

Thanks.

Best regards,

Laura Patterson  
18 year Portland resident and homeowner

**From:** [Meghan Robinson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment - Meghan Doherty - LU 24-041109 CU EN GW - PGE Expansion @ Forest Park  
**Date:** Monday, December 9, 2024 11:19:06 AM

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Dear PP&D,

My name is Meghan Doherty and I am a resident of the Portland Roseway neighborhood, a regular visitor to Forest Park, and an environmental policy professional specializing in environmental justice issues. I am writing to strongly urge PP&D to **deny the land use permit currently being sought by PGE** for the proposed “Harborton Reliability Project” powerline expansion.

Forest Park is a critical natural resource for our city. As previously recognized by the City, this proposal would cause significant harm to the park, undermining its management goals, disrupting bird and wildlife populations, and negatively impacting recreational spaces cherished by Portland residents.

After reviewing the Forest Park Natural Resource Management Plan, I believe this proposal is in direct conflict with the intent and principles of the plan. The ecological and recreational value of Forest Park far outweighs the potential benefits of this project.

I am also concerned about the necessity of the proposal and believe greater study, justification, and transparency are needed. Activist groups have presented compelling evidence that the primary driver of this expansion is industrial growth, benefitting entities like Intel and the utility provider, PGE. It is concerning that these beneficiaries would bear little to none of the proposal’s environmental or social impacts, which would instead fall disproportionately on the general public and the Forest Park ecosystem.

The proposed mitigation efforts appear grossly inadequate and would take decades to restore the ecosystem to its current strength—if at all. Additionally, I believe that not all viable alternatives, including the “no action” alternative, have been fully considered. Based on the information available, these alternatives are far preferable to the proposed project.

For these reasons, **I am firmly opposed to this project** due to its detrimental ecological and economic impacts on Portland residents, myself included. Moreover, PGE’s proposal fails to comply with the Forest Park Natural Resource Management Plan. I respectfully urge you to deny PGE’s land use permit application.

Thank you for your time and consideration.

Sincerely,  
Meghan Doherty

--

Meghan (Doherty) Robinson | [meghanpdoherty@gmail.com](mailto:meghanpdoherty@gmail.com) | 773.315.9503

**From:** [Rachel Scales](#)  
**To:** [Caruso, Christine](#); [Steele, Morgan](#)  
**Subject:** Public comment about PGE powerline expansion  
**Date:** Monday, December 9, 2024 11:56:40 AM

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> To whom it may concern,

>

> I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

>

> The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

>

> Additionally, PGE's power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

>

> I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Please refuse PGE's land use permit.

>

> Thank you for your consideration,  
> Rachel Scales

**From:** [Catherine](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Monday, December 2, 2024 8:26:59 PM

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Hello Morgan and team,

Thank you for offering this Public Comment period regarding the PGE's Forest Park Harborton proposal.

Riding the bus to Forest Park's NW Thurman Street trailhead is a monthly ritual for me. Walking onto the path is an escape from the bustle of life. Seeing the towering tree canopy, hearing the many species of birds, and seeing the owls and wildlife is a unique-to-Portland-Oregon experience. The fact that Forest Park is accessible by bus is a bonus! I cherish these trips. They fill my soul.

Forest Park is an amazing and rare gem: old growth forest within city limits.

It pained my heart to hear of PGE's Harborton proposal for these reasons:

- 1) The Forest Park Natural Resources Management Plan (NMRP) protects Forest Park, specifically stating that the land be ear-marked for old growth forest and for educational opportunities. The NMRP document is legally binding. PGE's proposal directly contradicts the NMRP with its requirement to clear-cut 5 acres of that protected land.
- 2) Clear-cutting that 5 acres will cause irreversible, irreparable damage to the forest ecosystem. Over 200 species of wildlife call Forest Park home, not to mention the salmon that migrate in the nearby tributary. Clear-cutting these trees will cause erosion, mudslides, and will increase the risk of wildfire. (The low vegetation around the existing transmission lines is already drier. Climate change will only make this area drier in years to come.) That swath of forest—the five acres in the proposal—includes old growth trees: ancient canopies that are fragile wildlife habitat.

Forest Park and this swath of trees is also a migratory path for thousands of birds every year. This area is fragile, protected habitat at the confluence of the Willamette River.

- 3) PGE has other options. It would be a huge public relations win for PGE to choose another location from their Alternatives Analysis. Please avoid Forest Park.

Choosing an alternative location would also give PGE environmental credibility. I hope they can see that as a win as well. It would boost their "Green" and Carbon Neutral goals by leaps and bounds. If the PGE Foundation might donate to the Forest Park Conservancy, in addition to choosing another location? What an even bigger win this could be for both sides.

- 4) Approval of this project would set a precedent for future clear-cutting for future phases of PGE's project and other development in Forest Park. Let's avoid this slippery slope.

Again, Forest Park is a rare gem that we must protect.

I ask that you please reject PGE's Harborton Forest Park proposal. Thank you.

Respectfully,

Catherine Coleman

Cell: 503.890.9402

Email: [CathColemanWriting@gmail.com](mailto:CathColemanWriting@gmail.com)

**From:** [Jay Monk](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Commenting on LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 11:36:14 AM

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Hello Morgan Steele,

I am writing to express my concern to you regarding PGE's proposed development to widen and extend the transmission corridor for the Harborton 230 Kv project. There are many reasons for my concern, and I want to share with you about the impact this would have on me personally, as well as the impact on our regional culture and the wildlife habitat. PGE's Harborton project as it stands contradicts the priorities of the Forest Park NRMP.

I've lived in Portland for 10+ years now, having moved here from Corvallis, OR. I love exploring the city and forested spaces within and surrounding the city. I feel very lucky, grateful to live in such proximity to forests like what grows here. The proximity is especially important to me, as I have not had access to a car for much of the time I've lived here; so I've often rode my bike or taken a bus to navigate to forests for hiking trails and other recreational activities. Forest Park is a gem of a natural habitat and this space needs to be protected. Not only is it a valuable resource for outdoor recreation, there are many humans living here with spiritual connection to this land specifically, and there are thousands of old growth species of trees, and critical habitat for wildlife inhabiting forest park. I have experience hiking on wilderness trails that end abruptly with a transmission corridor and then pick up after I've passed the ROW. The impact here on the forest is long lasting and irrecoverable.

PGE proposes to clear cut close to 5 acres of land to improve its transmission of electricity. I've reviewed some documents from PGE's application for development. The stated goal of the project, to improve transmission reliability by splitting up a three terminal transmission line into two-2 terminal transmission lines, makes sense and is a valid concern for engineers working to serve electricity to our region. The documents include a report from Toth Engineering Associates which describes alternatives to the Forest Park corridor. A later phase of the proposed project would clear cut 15 acres of forest habitat to expand the transmission corridor further. It is vital to the health of Forest Park that development on this ROW expansion not proceed, PGE should utilize existing easements on other land zones that are not a part of the Forest Park NRMP. PGE's own analysis shows this is feasible.

I think it's very concerning that PGE construction crews would have to invade space in the forest which has been designated as critical habitat by the Forest Park NRMP, located in the north unit. Impacts on the habitat there would not be confined to the planned ROW space, as terrain, noise, sight and smell impacts from construction and operations of the corridor would adversely impact wildlife and humans inhabiting this space. This corridor would provide a pathway for invasive species to encroach on the park, including plants which adversely impact human recreation and safety such as poison oak and thorny blackberries.

I think it is best to consider this project in a historical perspective. Western European colonizers (our culture), have inhabited this land for not even 200 years. We should consider the impacts on that scale, and look to the original stewards, Native Americans and tribal organizations, for how to care for the land now. The clearing of land to make space for Portland, harvesting of forests for lumber to build the city, has had an extensive impact. Climate change affects ongoing today demand that we take a longer view to understand the scale of impact from proposed projects like this. The PGE clearcut would destroy irreplaceable



trees and wildlife habitat, which provide critical ecosystem services that help to stabilize our regional ecology. Portland cannot afford to lose this old growth habitat.

Sincerely,  
Jay Monk-Baumann

**From:** [Roger Brown](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Comments on PGE Harborton Reliability Project (LU 24-041109 CU EN GW)  
**Date:** Tuesday, December 3, 2024 11:16:45 AM

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To whom it may concern:

I am writing to express my concern with PGE's proposed Harborton Reliability Project. While the goal of improving the electrical grid infrastructure is important, it should not come at a cost of clearcutting within Portland's premier park. As alternatives to the proposed project are available, these should take priority over significant degradation within Forest Park. For example, an alternative that did not appear to be evaluated is using the already established BPA corridor through the park. Another alternative that should seriously be looked at is reconductoring existing lines.

Mitigation cannot replace what will be lost in the park and ecosystem within any reasonable timeframe. While some of the alternatives may have a higher cost, this should be borne by the most-likely large users, i.e., current and future data centers and large manufacturing facilities in the Tualatin Valley.

A major concern is also one of precedent. If PGE is not required to abide by the *Forest Park Natural Resources Management Plan*, which was codified by City Council, what will prevent more requests for clearcuts and negative impacts in the park in the future. Please do not allow the degradation of Forest Park. Instead, require PGE to seriously explore and choose an alternative to the proposed Harborton Reliability Project.

Thank you,  
Roger Brown  
1948 SW Edgewood Road  
Portland OR 97201

**From:** [Tyler Hunt](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Defend Forest Park  
**Date:** Tuesday, December 3, 2024 10:42:11 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Theo Ernesti](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Tuesday, December 3, 2024 10:46:56 AM

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Have you been walking around this beautiful land? If not please do, because you'll really see and understand why any thoughts or actions to interfere with Mother Earth should not even be a thought.

*Please stop your expansion plans and actions to expand. Thank you.*

--

Teach Only Love  
Theo

**From:** [Will Lardner](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest park  
**Date:** Tuesday, December 3, 2024 9:44:15 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Zack Chapman](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Tuesday, December 3, 2024 7:35:23 AM

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**Hey Morgan,**

**I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.**

**The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.**

**Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.**

**I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.**

**Thank you for your consideration.  
Zack Chapman**

**From:** [Katherine Mix](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park Natural Resources Management Plan.  
**Date:** Tuesday, December 3, 2024 11:09:23 AM

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Dear Morgan Steele,

I am writing to object to the proposed PGE plan for tree cutting in Forest Park. I have seen repeatedly the devastation of these sorts of projects, and how planned remediation of tree cutting by planting trees in no way replaces what we lose.

In a time when wild places receive pressure from climate and development, let PGE choose one of their alternate options, and save what is so precious and irreplaceable.

Sincerely,  
Katherine Mix  
Sent from my iPhone

**From:** [Nathan Parker](#)  
**To:** [Steele, Morgan](#)  
**Subject:** I reject the Harborton Reliability Project  
**Date:** Monday, December 2, 2024 10:37:43 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Warmly,  
Dr. Nathan Parker  
Sent from my iPhone



**From:** [Janet Carter](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 11:51:26 AM

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Dear Morgan Steele,

One of the reasons I chose to move to Portland several years ago is the beauty and closeness of the trees and forest of the city. I love living close to downtown and also be able to drive 5 minutes and be in old-growth forest. Forest Park is an incredibly special place, for so many reasons. I've recently joined a hiking group and we specifically explore Forest Park trails. I love that it provides a sanctuary for wildlife; it's trees clean our air, filter our water, and cool our city. Having a place like Forest Park so close to our city is a rare privilege, and it is an incredibly valuable resource, both ecologically and spiritually. The state of Oregon, and particularly Portland, has already lost so much of its old growth forests in the name of development, logging, and electricity - it would be a travesty to lose any portion of Forest Park too.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to **support the forest in becoming an old-growth forest**. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that **there are several alternative locations outside Forest Park to locate the project**. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project sets a precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,

Janet Carter

**From:** [Ben Pierce Mendenhall](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Lu 24-041109 cu en gw public comment on pge plan for forest park  
**Date:** Tuesday, December 3, 2024 11:15:47 AM

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Hello, please include my comment for PGE plan to cut down more of Forest Park... NO!

Please do not allow further reduction of portland trees, portland parks, portland wildlife, portland.

We need the trees. Electricity can be routed elsewhere. This carbon sequestering, natural habitat, and oxygen providing park is more than beautiful, it is how we breathe and live.

No no no! Do not cut trees. We need to grow trees and protect trees.

I'm sure it will cost more to route the electricity, but continuing to damage the earth (even where we have already done damage) is not healthy.

Thank you,  
Ben Mendenhall

Communication via email is not considered highly secure.

**From:** [Connie Lo](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 2:17:43 PM

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Dear Morgan Steele,

I have lived in Portland for the past decade and as a trail runner, spend multiple days a week in Forest Park. Forest Park is an incredibly special place for so many reasons. It provides a place for escape, community, and serves as a refuge for wildlife and fauna. I am also a wildlife veterinarian who helps treat injured and orphaned wild animals - I already directly witness the negative consequences of human impact on the natural world.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It ignores the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- The proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss. Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. **I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.**

Sincerely,

Connie Lo

--

Connie Lo, DVM

**From:** [Jean Meihoff](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU24-041109 CU EN GW  
**Date:** Monday, December 2, 2024 9:27:17 PM

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To Whom It May Concern:

I am writing on behalf of our beloved city treasure, Forest Park and its Forest Park Conservancy (FPC) to ask that the City of Portland reject a proposal from Portland General Electric to use parts of Forest Park for its Harborton "Reliability" Project. As a native Oregonian with a deep love for this city and its protected assets, I ask that the request from PGE be rejected. Do not allow our city parks to be cut up piecemeal and put to commercial use.

Sincerely,

Jean Meihoff  
1300 NE 16 Avenue, #537  
Portland, Oregon 97232  
503 706 4838  
[jeanmeihoff@comcast.net](mailto:jeanmeihoff@comcast.net)

**From:** [Cecesthiftnshoes Z](#)  
**To:** [Steele, Morgan](#)  
**Subject:** NO CLEAR CUTTING.  
**Date:** Tuesday, December 3, 2024 1:17:50 AM

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- For the future of our families and generations. -

Helping capitalists win isn't a win for u. It's a win for them.

DONT CLEAR CUT.

**From:** [Rhesa Ramdeen](#)  
**To:** [Steele, Morgan](#)  
**Subject:** No to PGE expansion within Forest park  
**Date:** Monday, December 2, 2024 11:06:37 PM

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Hello,

As a resident in Portland, I know the priceless value of our urban natural areas, especially Forest Park. This natural area is such a beautiful and vital natural space and I have always been impressed by the city's prioritization of green space in this important forest ecosystem.

Given that this project goes against the priorities of the established Forest Park Natural Resources Management Plan (NRMP), and that PGE has other options for developing the power grid infrastructure, I didn't understand why they would push this plan forward, a plan that would consider loss of 5 acres of this treasured urban green space.

I'm asking that the city denies the proposal the expand PGE development in Forest park. Forest Park Natural Resource Management Plan.

Thank you for your consideration,  
Rhesa

**From:** [Scott M](#)  
**To:** [Steele, Morgan](#)  
**Subject:** park  
**Date:** Tuesday, December 3, 2024 9:28:19 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Christina Hatch](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE forest park  
**Date:** Tuesday, December 3, 2024 12:32:56 PM

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Dear Morgan and Christine,

I was born in Portland have traveled many places but have always stayed living close to my place of birth. The parks of this area are what makes it a perfect combination of metropolis and healing natural area. Without the joy that parks bring seasonal depression would be too much for many who live here. There is research behind old growth forest being much more important for methane removal. This is a huge part of why we have such amazing air quality for a city. And if a fire sweeps through the old growth will withstand. This is too large of an area to lose.

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts on Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas very precious to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate-smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit.

Warm regards,

Christina Marie Hatch



**From:** [Tim Timberlake](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Plans  
**Date:** Tuesday, December 3, 2024 7:01:57 AM

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Greetings Morgan,

As a resident of NW Portland in close proximity to Forest Park, I write in protest of the proposed power line through the northern part of the park. Destroying habitat of the protected red-legged frogs and taking down two century old growth oaks when PGE's Alternatives Analysis offers other tracks for the power line, seems a desecration of this hallowed preserve that would change its character forever. Please consider seeking other avenues to address the growing power needs of our city.

Most sincerely,  
Joseph Timberlake  
NW Pettygrove Street

**From:** [Nancy Hiser](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Resilience Public comment  
**Date:** Monday, December 2, 2024 8:59:38 PM

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Hello Morgan,

I am voicing my concerns about PGE's proposed plans to cut 5 acres of trees in Forest Park for expansion.

When we moved here almost 20 years ago, Portland seemed idyllic. Verdant, drivers were courteous, the pace of life was comfortable, and the city had an urban growth boundary. In just two decades, we have lost so much.

After just a few years, we were confronted by an activist who spoke to us about something we never expected to hear:

"Portland has very polluted air?" What? Not possible! When that was confirmed, it was a wake up call. Over the years,

we have learned that Portland only pretends to be "green." The greed of industry is not curtailed; it is supported ("permitted")

in the name of economic growth / progress. And the environment--air, water, and land, along with residents' health--is sacrificed.

Looking to the future,

If you approve this plan, how will you be able to deny the future project expansions that are projected to include even more acres of cutting?

At what point does the natural world, the environment, come before our need for more, more, more?

Has PGE truly looked at the alternatives? Why should this natural and treasured area be sacrificed so that some "bad players," like Intel,

can reap more profits from their humongous data centers?

What would our world look like if, as in South America, companies must prove they will not harm the environment before

they are permitted to exist rather than permitting them to pollute and damage -- trying to hold them accountable later--almost always

unsuccessfully--after the reality is exposed?

While these ideas may sound radical, they are not. Yes, we need to transition away from fossil fuels but we must work harder

to electrify with our eyes open to how we do this.

The lack of vision years ago has led us into troubled waters. We have swallowed the corporate lies about tobacco, about carcinogenic chemicals, about natural gas and fossil fuels, and so much more. When do we take charge and act on behalf of the planet, the people, and wildlife?

Sincerely,

Nancy Hiser

Linnton

**From:** [Brian Hagan](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please protect Forest Park, no to the PGE clearcut  
**Date:** Monday, December 2, 2024 8:01:04 PM

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Subject: Re: LU 24-041109 CU EN GW

Dear Morgan Steele,

I was born at St. Vincents hospital on the edge of the West Hills, and have lived my life in Portland enjoying Forest Park.

In 2016 I hiked the full length of the Wildwood trail, and was amazed at the bird and animal life, and how many plants and trees were near the trail that do not grow anywhere else in the city. I am so proud of our city having such a beautiful and thriving forest in the city limits.

I was started to hear about PGE's proposal to develop land inside Forest Park.

The trees are part of a forest that is interconnected, with plants, animals, fungus and insects that form an ecosystem. Once they are gone, they will not come back.

I know that PGE can find an alternative way to work on the power grid. There are other areas that could be used.

Please do not let them destroy any part Forest Park.

Sincerely,

**Brian Hagan**

**(503) 268 2468**

**From:** [Sarah Crawford](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please Reject PGE Forest Park Proposal  
**Date:** Tuesday, December 3, 2024 8:59:49 AM

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Hello,

I am extremely concerned about PGE's proposal to cut acres of forest park. I am confident Intel and an electrical company, PGE or otherwise, can make an alternative plan, but cutting into the habitat of animals and removing the forest from forest park can never be undone.

I've lived in Portland for 16 years and forest park has been one of the most significant parts of the city for me. I know I am not alone in feeling this way. Please help protect part of what makes Portland a wonderful place to live, especially in this time when our city is struggling.

Thank you for reading and protecting our city,  
Sarah Crawford

**From:** [Alexandra Moskow](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protect Forest Park!!!  
**Date:** Monday, December 2, 2024 8:47:54 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents. I yearn to see Forest Park grow into ancient forest, with diverse flora & fauna populations.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. PLEASE refuse PGE’s land use permit. Thank you for your consideration.

Alexandra Moskow  
*Licensed Massage Therapist*  
*OR LMT #27480*



**From:** [Rachel Weston](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protecting Forest Park  
**Date:** Tuesday, December 3, 2024 3:27:01 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Rachel Weston

**From:** [Eileen Fromer](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-04119 CU EN GW  
**Date:** Tuesday, December 3, 2024 10:35:53 AM

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Dear Morgan Steele,

I have lived in Portland most of my life and my family has been here since 1902 since my grandparents emigrated from Eastern Europe. Forest Park is a treasured space in our city meeting city blocks with abundant nature - a sanctuary for wildlife, and trees that clean our air, filter our water and cool our city. When I walk in the park I breathe deeply and appreciate each wonderful moment. The park is a privilege I treasure.

PGE's proposal to develop inside Forest Park is concerning for many reasons. It fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

1. The proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down old growth and replacing them with saplings does not align with this goal.
2. PGE's own analysis has shown that there are several alternate locations outside Forest Park to locate this project. It is possible to upgrade their power grid without impacting Forest Park at all.
3. Approval of this Project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that - more cut trees, stream degradation and habitat loss.

You must reject PGE's [proposal for the sake of our city, the trees, the wildlife, the people and our future generations.



Sincerely,  
Eileen Fromer  
8175 SW 71st Ave.  
Portland 97223

**From:** [Jared Rose](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 12:11:37 PM

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Dear Morgan,

I've lived in Portland for the past thirteen years and Forest Park has been a major part of my life since arriving in this great city. Forest Park is one of the main reasons that Portland is, was, and will continue to be a desirable place to live, work and play. PGE's proposal to develop inside Forest Park is an existential threat to one of Portland's greatest assets and is extremely concerning for a number of reasons. I ask you to reject this proposal!

As an avid trail runner, I have spent countless hours running thousands of miles on the trails Forest Park. I've completed the full length of the iconic Wildwood Trail eight times and even used a measuring wheel to give the community an accurate count of its 160,260 feet. I've donated hundreds of hours of my time to perform trail maintenance work with Forest Park Conservancy, giving the City of Portland thousands of dollars of free labor. To say I have a keen interest in the wellbeing of Forest Park for current and future generations is an understatement.

This proposal flies directly in the face of the best interests of the community, the environment and the City of Portland. Here are just a few reasons to reject it:

1. The PGE proposal is a direct contradiction of the City's own Forest Park Natural Resources Management Plan. Clear cutting 5 acres (for now) of Forest Park is NOT managing the park towards old growth!
2. There are other options outside of Forest Park and PGE's own Alternatives Analysis shows that. That's not Forest Park Conservancy's or the Bird Alliance's findings, that's PGE's own analysis.
3. What precedent does this set? This project is Phase 3, but even PGE won't admit how many phases there are. It's 5 acres today, another 10 next year and what after that? Why stop at just PGE projects when you've opened the park up to development?
4. This clear cut opens the door for invasive species takeover that further threatens the health of the forest that isn't clear cut. Just look at the BPA corridor and the prevalence of blackberry bushes that are choking out native species.
5. PGE proposes the bare minimum of mitigation and remediation for the generational damage they are proposing. They propose to irreversibly damage Forest Park for generations to come for the sake of Intel and a savings of hundreds of millions of dollars, while doing next to nothing to protect the remainder of the park.

Forest Park is a rare and precious resource, the envy of cities all over the world, and we need to treat it as such. It's often front and center on Travel Portland marketing. For the sake of

current and future generations of trail runners, hikers, birders, walkers, bikers, Portlanders, tourists, trees, plants and animals I ask you to reject PGE's proposal.

Sincerely,  
Jared Rose

**From:** [Sue Donora](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 8:28:51 AM

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Dear Morgan,

I've been a Portlander for many years - from 1983-1987, and then from 1991 to now. Forest Park has been my refuge from the city during all of that time - I've mountain-biked Leif Erikson more times than I can count, and I've hiked most of its trails over the years. As a Backyard Habitat certification volunteer, I'm infatuated with native plants and birding, and Forest Park is an excellent place to find so many beautiful plants and birds.

The more I travel around the United States, the more I understand what an absolutely unique treasure Forest Park is for Portland's residents - both people and animals - and what an important role it plays in keeping our Portland water and air clean.

Given this, I am very concerned about the current PGE proposal to cut down trees and fill in waterways to develop part of this very precious park. Yes, it's only 5 acres, but once that type of development starts - once that line has been crossed - it becomes very easy for further development to be approved. We cannot cross that line.

The agreed-upon goal for Forest Park is that it stays as is, to eventually develop into a true old-growth forest. We need to leave Forest Park as it is, and have PGE pursue one of its alternative options that don't impact the park.

Please reject PGE's proposal for Forest Park.

Thank you for your time.  
Sue Donora  
6141 SW Orchid Drive  
Portland, OR 97219

**From:** [Marcy Houle](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 2:48:59 PM

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Dear Morgan Steele:

I am writing to you today to voice my deep opposition to Portland General Electric's (PGE) proposal to the City of Portland to update and expand their power grid infrastructure within Portland's Forest Park, in a proposition known as the Harborton Reliability Project.

This expansion would severely impact nearly 5 acres of mature forest located within Forest Park's important North Unit -- an area that has explicit protections in place, documented in the Forest Park Natural Resources Management Plan (NRMP), for its priceless wildlife and habitat qualities.

I am a wildlife biologist who has studied Forest Park for over four decades. My work for the Oregon Parks Foundation, from 1980 - 1982, is compiled in a document "Forest Park: One City's Wilderness: Its Wildlife and Habitat Interrelationships." Published in 1982, this scientific work is the first of numerous wildlife studies undertaken in Forest Park, and the first time the importance of old growth ecosystems is noted and recommendations outlined that have since that time become part of the NRMP.

From the scientific report, page 65,66: *"From the standpoint of diversity alone, acreage should be set aside to become old growth. Franklin et al. (1981) states two major recommendations for the distribution of old growth stands:*

- 1. Entire drainage basins are the most desirable places old growth stands as their topographic features provide protection from outside influences such as windthrow. Plant and animal diversity is also higher in a drainage basin than in an isolated upland forest stand of the same size.*

- 2. Areas having landslide potential are also preferred locations for old growth stands because of the stability provided by continuous root mantles of old growth trees.*

*In Forest Park, three stands, presently of the Mid-Aged Conifer vegetation type by having inholdings of old growth, are recommended to become old growth stands.*

- 1. Springville-Germantown Stands.*
- 2. Newton Road Stands*
- 3. Miller Creek Stands.*

*These areas have severe erosion potential (Soil Conservation Service 1978) and are drainage basins, making them highly suitable to be set aside for potential old growth habitat. In addition, 46% of all observations of the most sensitive bird species occurring in Forest Park from 15 February through 1 July, were in these three areas."*

Why is this important today?

The area that PGE is proposing to industrialize *lies within the Newton Road, Miller Creek Stands.*

Since the time of my original studies of Forest Park, more have been done by scientists. All are in agreement that the North Unit of Forest Park, which is where PGE proposes to clear cut and expand its power lines, are the most critical habitats within Forest Park. These goals are

clearly spelled out in the Forest Park Natural Resources Management Plan, which is law, Ordinance 168509.

From the Ordinance:

*“The health of natural resources (is) the top priority for park managers.” (iii)*

*“The Natural Resources Management Plan is designed to preserve and manage this unique forest and the numerous values it provides.” (29)*

*“Portland Parks and Recreation will be an active advocate for protection of Forest Park resources. Park managers will advocate at every level for the protection of park resources where Forest Park resources may be affected by the outcome.” (iv)*

When considering PGE's proposal it is vital to understand that what Forest Park offers is WORLD CLASS habitat and is IRREPLACEABLE.

What does this mean? Let me break this down:

Forest Park is an example of the Pacific Northwest western hemlock forest community—an ecosystem unique among all temperate forests in the world. Its extensive forest canopy plays essential roles in Portland—filtering out pollutants, sequestering carbon emissions, and cooling a warming city. In this ecosystem:

1. Species of coniferous trees of the region attain a greater age and size than those found anywhere else in the world.
2. In terms of the sheer plant material, these forests have a greater accumulation of biomass (living and decomposing vegetative matter) than any other of the earth's temperate forests.
3. In their native condition, Northwest forests are highly unusual in that they are dominated by coniferous trees.

Because Forest Park remains in a largely natural condition, it has maintained all of the Western Hemlock Zone's naturally evolved, characteristic plants. Because of the park's tremendous value to future forests, to watersheds, and to native species of wildlife, the park's mature, second-growth coniferous landscapes are being managed to naturally age and

to develop climax attributes. Remarkable for a city of Portland's size, Forest Park today can be thought of as a living sanctuary for an evolving old-growth ecosystem.

Research shows that Forest Park serves as a wildlife reserve for many species because of its *Interior Forest Habitat*. It is a resource for many species now suffering decline. It has the highest number of at risk or Special Status Species in the region. These priority conservation species are determined by state and federal agencies, the National Audubon Society, Partners in Flight, and biodiversity center. Three dozen species, or one third of all Forest Park birds, are denoted as Special Status Species of concern.

So what is interior forest habitat and why is it important? And why has Forest Park's North Unit been singled out as the most valuable habitat in the park?

Interior forest habitat is defined as native woodland vegetation occurring in large, unbroken pieces and not dissected by roads, clear cuts, or residential or industrial or agricultural development. It is becoming increasingly rare in urban areas. Yet many species of native mammals and birds, particularly migratory songbirds, are extremely dependent upon habitat that occurs deep within the forest, far from the "edge." Many animals that frequent edges of forests—such as starlings, opossums, skunks, and raccoons—tend to be predacious or parasitic upon forest birds. *This has wreaked havoc on native wildlife populations.*

Once more, Forest Park is set apart from all other city parks in that it still retains a significant amount of exceptionally cohesive *interior forest habitat* north of Germantown Road. *This part of the park is called Forest Park's North Unit.* Because of its scarcity within urban areas, the worth of Forest Park's interior forest habitat only continues to rise.

The Forest Park Management Plan ordinance states this explicitly:

**“Interior forest habitat is Forest Park’s most unique and valuable asset. No other urban park in the United States offers anything comparable in quantity or quality.”**

For all of these reasons, I adjure you to deny PGE's proposal that would gravely affect Forest Park's crucial North Unit. Portland General Electric's plan to remove 150 year old maturing coniferous trees, and replacing them with oak saplings does not come close to replacing the unique, unparalleled habitat. Further, if this project is approved, it could set a

dangerous precedent for future phases of PGE's project and other development in Forest Park. Moreover, other places outside of Forest Park, already identified in the Toth Report, could be studied as an alternative.

In conclusion, we need to remember why Forest Park today plays such an invaluable role.

Today, wild animals and plants are disappearing at rates never before seen during human existence, and those rates are increasing. According to the National Geographic and National Audubon Society, we have lost 3 billion birds in North America in the past 50 years. New analysis from the World Wildlife Fund and Zoological Society of London state that the earth's wildlife populations have disappeared at "catastrophic rates" in the past half century. 73% of wildlife populations have experienced drastic declines.

Forest Park today supports essential habitat for numerous and diverse plant and animal species. If we hope to preserve such irreplaceable habitat for future generations it is imperative that we continue to follow the ordinance and stated specifications in the Forest Park Natural Resources Management Plan.

As the Ordinance tells us: **"Above all, wildlife habitat in the North Unit should be protected."** (page 105)

For our children, grandchildren, and those to follow, please stand up for the law. Deny PGE its current proposal.

Sincerely,

Marcy Cottrell Houle, MS  
16600 NW Gillihan road  
Portland, OR. 97231  
503-222-5455



**From:** [Kathleen Worley](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109CU/EN/GW  
**Date:** Tuesday, December 3, 2024 11:10:51 AM

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Re: PGE proposal for north end of Forest Park

Portland is unbelievably fortunate to have an island of forest habitat providing a refuge for wildlife, water, and people. My favorite go-to places when I need to take a break to breathe, walk, think, re-set are Tryon Creek and Forest Park. As more people take advantage of this resource, I find myself walking on lesser-known trails, like those at the north end of the park. Therefore I'm particularly concerned by PGE's proposal to construct more power lines in this area.

One reason Forest Park has remained such a refuge is the establishment of the Forest Park Natural Resources Management Plan, stipulating that management should prioritize the growth of ancient forests within the park boundary and should protect and enhance the forests for educational and recreational uses. PGE's proposal is in direct contradiction of those goals. Power line construction would adversely affect two streams located between the current lines, would likely cause erosion on steep slopes, destroy several acres of mature forest providing wildlife habitat, etc. By PGE's own admission, it would also create a "wedge" for future PGE expansion, which would involve further destruction. PGE admits that there are other viable alternatives for the proposed construction project, which they should explore.

The Forest Park Natural Resources Management Plan is very clear and should be followed. Failure to follow the plan would create a dangerous precedent and endanger one of the gems of this city. For the sake of the park, the water, the air, the wildlife and the health of numerous city citizens, I strongly urge you to deny the PGE request.

Sincerely,  
Kathleen Worley

**From:** [Brooklyn Green](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 11:56:11 AM

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Hi Morgan,

My name is Brooklyn and I live right outside of Forest Park. I walk my three dogs in the park every day and I spend a lot of time inside watching birds, too. I would like to use my voice to add to others that oppose PGE's proposal. First and foremost, I am a hater of all things PGE. Second, I'm a hard core lover of nature, I can't get down with anything that threatens to harm it.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,

Brooklyn Green

**From:** [Luis Erazo](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 11:43:38 AM

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Dear Morgan Steele,

My first thought upon visiting Portland for the first time in 2010 was that it was a beautiful city that incorporated and respected nature. The entirety of the city boasts verdant parks and walking about feels like being in an arboretum. Forest Park, to me, is one of Portland's crown jewels. It has a spiritual quality, a church in the wild for those who want to bask in clean air, ancient flora, and abundant life.

Given the breadth of ecological beauty encompassed by Forest Park, it is disheartening to hear about PGE's proposal to clear cut 20 acres of the park. Their proposal contradicts the Forest Park Natural Resources Management Plan, which aims to support the forest in becoming an old growth forest. The issue is not 1-for-1; you can't cut down mature trees and replace them with saplings.

Secondly, PGE has shown that there are alternative locations for their project that would bypass Forest Park. Thirdly, allowing PGE this project would set the precedent that Forest Park can be developed even further. Forest Park is gem, the largest urban park in the United States. It is a model for how cities can be, how cities can respect nature, how the built environment can coexist with the natural world. Please, deny PGE's proposal!

Sincerely,

Luis Erazo

**From:** [Jason Johns](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 11:16:14 AM

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Dear Morgan Steele,

Thank you in advance for reading this. I want to take this opportunity to tell you how important Forest Park is to me and to ask that PGE's development proposal be denied in favor of committing to keeping Forest Park as it is.

I've lived in many places around the world. But I feel very lucky to now live in Portland. I feel that having lived in so many different places has given me a unique perspective on what makes Portland particularly special. One of the things I love the most is how intertwined the city is with nature. I know many residents regularly appreciate the ability to go from downtown, surrounded by skyscrapers, to then bike a few minutes and be in an old-growth forest. This is more than an amenity. This is part of the fabric of this city, and it changes how people understand themselves within the natural world. The park is a sanctuary for wildlife, it cleans our air, filters our water, and the trees help cool our city. It is also a sanctuary for people who can go there and breathe deeply and interact with nature which is an incalculable benefit to the general mental health of the city's residents.

Having a place like Forest Park so close to our city is a rare privilege that we cannot take for granted. We must recognize how valuable of a resource it is, both ecologically, spiritually, and economically as a prime attraction of the city and a reason people live in, visit, and revisit Portland.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan (NRMP). First and foremost, the proposal directly contradicts the top priority of the NRMP, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project.

Third, approving this project could set the precedent for future development. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that—more cut trees, stream degradation, and habitat loss. This proposal is more than just a proposal for one project, it should be considered as the beginning of more to come, and we must arrest this process before that begins.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological, cultural, and I know for many Portland citizens like myself, also a very personal loss. Please reject PGE's proposal in favor of an alternative location, and save Forest Park. Thank you.

Sincerely,

Jason Johns

**From:** [Erica Poole](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 11:09:08 AM

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Hi,

I am sending this email on behalf of Portland's amazing Forest Park! This beautiful ancient forest deserves to be protected!!!

The Forest Park Natural Resources Management Plan has a clear goal to grow this ancient forest. PGE is proposing to remove 150 year old trees and replace them with oaks. This is absolutely inadequate mitigation and will create a monoculture instead of the diverse ecosystem we are striving to protect. Additionally, the permanent destruction of wetlands and the negative impacts on the 2 existing streams is unacceptable and contrary to the NRMP.

PGE themselves acknowledge in their own analysis that there are other appropriate areas where this work could take place.

PLEASE abide by the NRMP and protect Forest Park!!

Thank you!!

Erica Poole

**From:** [C Fastwolf](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 10:41:54 AM

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Intro: Forest Park matters to everyone in Portland!

Main idea: PGE's proposal is concerning

To: Morgan.Steele@portlandoregon.gov

Subject: Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

In this decade of rapid climate change, I'm grateful to have [Forest Park](#), one of the largest urban forests in the United States at 5,200 acres, as part of Portland. I'm thankful for what it provides not just for humans, but for animals, plants, and the ecological systems of the Pacific Northwest that thrive there as part of our city. It's been proven trees clean our air, cool our cities, and help filter our water - and many cities, including Portland, strive to include *more* trees and natural areas within their boundaries.

PGE's proposal to develop inside Forest Park threatens our natural resources in many ways. It openly ignores important criteria for development laid out by the Forest Park Natural Resources Management Plan:

- PGE's proposal plans to cut down mature trees and replace them with saplings. This contradicts Forest Park Natural Resources Management Plan, which aims to support the forest to become an old-growth forest.
- PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- approving this project opens the door for future development in Forest Park that would further impinge on the management plan. PGE calls this a multiphase project, with more phases of development to come. Laying down

power lines in Forest Park is the first step to more expansion by PGE (and possibly others), one that threatens trees, streams, plants and animals, one that would destroy the ecology of the park.

Forest Park is a resource that belongs to ALL of Portland; the decision to alter its ecology should not be made by corporations. PGE's proposal does not align with Forest Park's management plan, and it would result in significant ecological and cultural loss. Please reject PGE's proposal for the sake of this natural world that exists within our city, and for the brighter future having preserved nature promises all of us.

Sincerely,  
Cathy Camper  
Portland, OR



**From:** [R. Murray](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 10:31:48 AM

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Dear Morgan Steele,

I've been hiking in Forest Park for 25+ years and am very concerned about PGE's proposal to clear what I'm now hearing is 20 acres of land. Having close access to beautiful old growth forests and abundant wildlife is part of what makes the city of Portland so incredible and we should be committed to preserving that as it's a core feature of our community and identity.

Allowing PGE to clear the proposed acreage threatens at-risk species, reduces the usable space for tax-payers and tourist who hike the trails daily, destabilizes the land, and directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.

PGE has already established several alternative locations for their project that would allow them to update their power grid without disrupting Forest Park. Not only that, but since their proposal has already increased to nearly 4x what it started at, it's very likely that allowing them to build within the park will only encourage further development of the protected area in the future.

PGE's proposal would result in devastating cultural and ecological loss. **Please reject their proposal and help preserve this treasured space for our community.**

Sincerely,  
Randi Murray

**From:** [Madeline Warner](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 10:22:40 AM

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Dear Morgan Steele,

My name is Madeline Warner, I'm a resident of Portland, OR and a lover of Forest Park. Being only 30 years old, there are few historical events that I remember with icy clarity, but the day the Supreme Court overturned Roe V Wade is one of them. On that day I was struck with deep and profound grief, and felt physically unsafe in my own body. I remember looking to my mom for guidance that she couldn't give. So we did what I imagine many other people did and continue to do—we went to Forest Park. I remember the immediate feeling of calm that washed over me, the noises of the city winking out behind us slowly, and then all at once. I remember the reassuring thud of the trail beneath my feet. I literally hugged a tree—clinging to a decades-old life force to find a shred of reassurance and hope for the future. This is one of many memories I have of Forest Park and I am deeply grateful that this natural resource is only a short distance from my home.

However, I've recently been disturbed to learn about PGE's proposal to develop inside Forest Park—a plan that involves cutting down 150 year-old trees that sequester carbon, resulting in devastating irreplaceable habitat for wildlife and setting a dangerous precedent for future development inside the park.

PGE's plan fails to meet the majority of the criteria for development laid out by the [Forest Park Natural Resources Management Plan](#). The primary goal of this plan is to support the forest in becoming an old-growth forest. The part of the forest that PGE proposes to cut down is home to mature trees and habitat for vulnerable wildlife. Replacing them with saplings is not a viable solution.

PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. **It is possible to update their power grid without impacting Forest Park at all!**

Finally, approving this project will set the precedent for future development in Forest Park that would further contradict the Management Plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion.

I urge you to reject PGE's proposal to develop in Forest Park. This is a precious resource for our city that must be protected. PGE's proposal does NOT align with our city's Forest Park Natural Resources Management plan. Please protect this ancient urban forest for the trees, wildlife, and people who love it dearly and call it home. This park is a source of life,

education, escape and—most importantly—hope.

Thank you for your time and consideration.

Sincerely,  
Madeline Warner

**From:** [Nik Ran](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 10:09:21 AM

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Has PGE study the Biotelemetry in the area? Do we better understand the wildlife that will be left without a natural habitat anymore? Aren't these areas filled with historical findings?

Environmental impact assessments? Where are these findings?

**From:** [Michael Powell](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 10:04:40 AM

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Dear Morgan Steele,

I live in Central California, and here one must travel away from the larger cities to experience a lush and active natural habitat like that afforded to the citizens of Portland in Forest Park. Our country's cities (and our country in general) are losing opportunities to be close in relation to natural habitats for wildlife, and, once they are destroyed, there is seldom opportunity to repair once the common regret for the destructive action takes hold.

Forest Park acts as a wildlife sanctuary and an air filter for Portland and our globe. I have relatives in Portland who are deeply connected to the park, which is an essential feature of the city for them. Having a place like Forest Park so close to your city is rapidly approaching extinction in our nation.

PGE's proposal to develop inside Forest Park contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

Approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that—more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource; potential mitigation plans are not sufficient. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations. Let's have Portland set a proper example for stewardship of our natural places near cities throughout the nation.

I'm asking that you reject PGE's proposal.

Sincerely,

Michael Powell

San Luis Obispo, California

**From:** [Chris Vita](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 7:51:54 AM

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I ask Portland Permitting and Development to reject Portland General Electric's (PGE) land use permit for the "Harborton Reliability Project" powerline expansion. The plan clashes with the Forest Park Natural Resource Management Plan and destroys crucial habitats.

PGE's expansion mostly benefits Hillsboro's booming tech sector, like Intel, not Portland's people. Though PGE claims the project meets rising electricity needs for climate-friendly goals, their own data shows tech facilities drive the demand.

This project hurts Portland's ecology to supply power-hungry tech facilities. It defies the Forest Park Natural Resources Management Plan. Please deny PGE's land use permit.

Thank you for your time,  
Chris Vita

**From:** [Emily Stebbins](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 7:26:45 AM

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Dear Morgan Steele,

I am writing to strongly urge you to deny PGE's request for a land use permit to clearcut in Forest Park.

As a lifelong Portlander, a parent, and an educator, I have hiked in Forest Park since childhood, and have felt lucky to be able to share it with my students and my own child. It is a sanctuary for Portlanders from all over the city. For generations, it has been a space to explore, connect, and find peace and inspiration. In the face of climate chaos, we need Forest Park in its entirety. In fact, we need more and larger green spaces to buffer us, physically and spiritually, against the impacts of extreme heat.

PGE's proposal directly contradicts the top priority outlined in the Forest Park Natural Resources Management Plan, which is to manage the park's forest toward old growth. This plan was carefully designed to ensure the long-term ecological health and resilience of Forest Park, and clearcutting would significantly undermine these efforts. Providing vital habitat for the Red-Legged Tree Frog and other protected species, Forest Park is an essential urban oasis that supports biodiversity, mitigates climate change, and provides recreational space for the community. The goal of preserving and enhancing this ecosystem should take precedence over short-term development needs.

PGE's own analysis has shown that there are several alternative locations outside of Forest Park that could accommodate the project. In fact, it is entirely possible for PGE to update and maintain its power grid without impacting Forest Park at all. This option has not been fully explored or prioritized in their current proposal, which raises serious concerns about the necessity of the clearcut. Given the availability of other locations, the destruction of such a critical and sensitive urban forest should not be seen as an unavoidable or necessary choice.

Approval of this permit could set a dangerous precedent for future phases of PGE's project, as well as for other development in Forest Park. Once the door is opened for clearcutting, it could pave the way for additional encroachments on this irreplaceable park. Forest Park has long been recognized as an invaluable resource—both for its ecological importance and its value to the community. We must preserve its integrity, not only for current generations, but for the generations to come.

I urge you to carefully consider the long-term impacts of this decision. Please deny this permit and stand firm in protecting Forest Park for the benefit of our community, our environment, and our children.

Thank you for your attention to this important matter.

Sincerely,  
Emily Stebbins

**From:** [Hope Lobkowitz](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 7:14:14 AM

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Dear Ms. Steele,

This comment is in response to the Harborton Reliability Project proposed by PGE and currently under review by the city of Portland.

The proposal directly contradicts the top priorities outlined in the Forest Park Natural Resources Management Plan (NRMP), and therefore I urge you to reject the proposal.

Specifically, the two main goals of the NRMP are to 1) grow an ancient forest and 2) protect/enhance the forest for education/recreational opportunities. PGE's proposal is in conflict with both of these goals.

Importantly, the proposal lacks adequate mitigation strategies: The ecosystem function lost through significant disruption of two streams and permanent filling of two wetlands is not adequately replaced with monoculture of oaks (as PGE proposes), which take 100+ years to reach maturity. This is not acceptable.

There are other viable alternatives for development outside of Forest Park, which should be considered. PGE's lack of transparency calls to question their genuine interest in community resiliency (a stated goal of the project); as PGE failed to release the Toth Report, which showed that viable alternatives existed, until Oct 2024. Further, PGE has not been transparent about their plans for future phases and its impact on Forest Park habitat - which is concerning and should be further investigated.

Sincerely,  
Hope Lobkowitz  
7423 N Huron Ave  
Portland, OR 97203



**From:** [Edith Mirante](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Tuesday, December 3, 2024 2:56:34 PM

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Dear Morgan Steele,

We are very concerned about the PGE proposed plan which would include severe clearcutting of native trees in Portland's vitally important Forest Park.

PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. PGE's own Alternatives Analysis shows there are several possible locations outside Forest Park. Further, approval of this destructive project could set a precedent for future phases of PGE's project and other development in Forest Park.

This is not a time to diminish and degrade urban Oregon's forest cover, as exemplified by protected Forest Park. PGE must pursue its alternatives instead. We urgently ask you to reject PGE's proposal.

sincerely,

Edith Mirante & John Paisley

8824 SE 9th Ave.

Portland OR 97202

**From:** [Susan Sanford](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Regarding PGE project in Forest Park  
**Date:** Tuesday, December 3, 2024 11:37:36 AM

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Please utilize one of the alternative locations outside of Forest Park for the PGE expansion. There is no need for clearcutting in this old growth woodland. In fact, the proposed project in itself is arguably a "feeler" to see if future projects of this nature will become the norm.

Yours,

Susan Sanford  
Sent from my iPhone

**From:** [Elisa Perry](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Subject: Re:LU 24-041109 CU EN GW  
**Date:** Monday, December 2, 2024 9:51:11 PM  
**Attachments:** [shrm-senior-certified-professional-shrm-scp.png](#)

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Dear Morgan Steele,

When I first moved to Portland, the first thing that struck me was how intertwined the city and nature are. I could be downtown, surrounded by skyscrapers, and then drive 5 minutes and be in old-growth forest. Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,

*Elisa Perry, MA, SHRM-SCP*

Human Resources Executive

[Linkedin.com/in/elisaperry](https://www.linkedin.com/in/elisaperry)

Mobile: 818.687.2208

		
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1330 N. Emerson Street  
Portland, OR 97217  
December 4, 2024

To: Morgan.Steele@portlandoregon.gov  
Subject: Re: LU 24-041109 CU EN GW

I have lived in Portland under three years, and am still figuring out if this is where I should try to settle down and contribute. The city has numerous positive qualities, including a top-notch urban park system. However, I often find myself stressed out by the ubiquitous noise pollution from the incessant traffic generated by the freeways, that, unfortunately, bisect Portland. And it can be challenging, especially for those of us who live car-free, to access real natural areas. As an avid birder and plant-lover and hiker, and as someone who needs an escape from urban noise and artificial light to stay healthy, Forest Park has been a treasure. I am thrilled to have access to a large park within city limits that supports an impressive diversity of birds, frogs, and other wildlife, and is specifically being managed to develop over time into an old-growth forest. We in Oregon need to do everything possible to maintain, protect, and support any possible old growth trees, not cut them down as we suffer each year from more climate-change-exacerbated heat waves and other extreme weather events.

Thus, I am deeply disturbed by PGE's proposal to develop and cut a particularly valuable, healthy section of Forest Park, which hosts wetlands, mature forests, streams, and the wildlife that depends on these habitats.

Most crucially, the proposal directly contradicts the legal document that guides administration of the park, including any possible development within its boundaries. According to the Forest Park Natural Resources Management Plan, the top priority for Forest Park's management is to support the forest in growing into an old-growth forest. PGE's proposal to cut down mature trees and replace them with saplings that would take many decades to mature certainly contradicts this primary goal.

Second, there is no reason for PGE's lines to even go through Forest Park. The utility's own analysis shows several alternative locations outside Forest Park where PGE could update their power grid. PGE must publically defend why they have not yet moved forward with these much less invasive and destructive alternatives.

Furthermore, I am very concerned that moving forward with this project would be a precedent for future development in Forest Park that would also go against the management plan. PGE has already alluded to a multiphase project, with more phases of development to come. Putting power lines in Forest Park could too easily lead to expanded clear-cutting, and thus, even more stream degradation and habitat loss.

I am grateful for the forward-thinking Natural Resources Management Plan that has protected Forest Park for decades, and for thousands and thousands of Portlanders, as well as the essential habitat necessary for so many taxa of flora and fauna, many quite rare and threatened. I urge you to reject PGE's proposal and so prevent dangerous ecological damage and loss of precious recreational opportunities.

Sincerely,  
Ellen Hamingson

**From:** [Isaac Steinman](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Deny PGE permits for Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 1:44:52 PM

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Hello, I'm writing today to urge you to deny permits to PGE for their Harborton Reliability Project. I understand 20 acres of Forest Park will be clear cut, devastating many frogs, and other important species in the area. I have always admired Portland for it's protection of nature and hope the right choice is made. I have lived here my whole life and would hate to see it go.

Thank you,

Isaac Steinman

**From:** [Moe Bowstern](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Don't Clearcut Forest Park  
**Date:** Wednesday, December 4, 2024 11:04:18 AM

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Dear Morgan Steele,

I've lived in Portland since 1996, and have been visiting Forest Park since my first visit to portland in 1990. Whenever I host visitors from other cities I proudly bring them to our local forest, and tell them about its long history and how it is home to many native plants and animals. It's ecosystem is so important especially during these years when rapid growth has felled so much of our urban canopy. I am certain that Portland can come up with a better plan than to accommodate a private corporate interest. PGE's proposal is concerning for these reasons that have been ide tided by trusted groups working in the interest of all residents, not just those invested in corporate development:

1. PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.
2. PGE's Alternatives Analysis shows there are several possible locations outside Forest Park.
3. Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park.

Now is not the time to engage in wholesale habitat destruction of a cherished shared resource that belong to the citizens of Portland. Do not clearcut Forest Park.

Thank you so much for your time,  
Sincerely  
Lara Mulvaney

**From:** [Anna James](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park & PGE  
**Date:** Wednesday, December 4, 2024 7:04:29 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

-Anna James

Sent from my iPhone



**From:** [Janesa Kruse](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest park  
**Date:** Wednesday, December 11, 2024 4:37:40 PM  
**Attachments:** [image001.png](#)

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Hello,

Please do not do this project in forest park. I'm sure you can choose another site for your research. Once you start it sets a precedent just let forest park be free, we regularly hike in forest park and see animal who also need it undisturbed and as a corridor for travel. I'm not in support and would like you to change this plan.

Thank you

janesa

janesa kruse [director]  
ONE WITH HEART  
MARTIAL ARTS  
SE HAWTHORNE 503.231.1999

-----  
[website](#) [facebook](#) [twitter](#)



**From:** [Lauren mcgrath](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Wednesday, December 4, 2024 10:30:29 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration. to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Lauren McGrath

**From:** [Samantha Cohen](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Wednesday, December 4, 2024 7:38:49 AM

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Hello,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sam Cohen  
Portland, OR 97213

**From:** [Mark R. Osborn](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park and PG&E  
**Date:** Wednesday, December 4, 2024 7:46:36 PM

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Dear Ms. Steele

I write to object to the proposal by PGE to clear more than four acres of Forest Park for expansion of its grid system. Since moving back home to Oregon in 2016, Forest Park has been a local hiking destination for me and I love the quiet walks along the wooded trails. As I understand it, there is a plan that exists for managing Forest Park which specifies the protection of and support of the forest itself as its highest priority in an effort to create an old-growth forest. The PGE plan directly contradicts this goal. It's hard for me to understand any amount of clear-cutting or tree removal (barring individual tree removal for strictly safety reasons) when the science of carbon storage in older trees is proven to be necessary to avoid escalating the speed at which we approach the climate abyss. And we are beyond the point where utilities and industries should be able to trounce on public lands with weak mitigation plans masquerading as fair and adequate trade-offs. From their own reports, there are alternatives that would not involve the park. These should be elevated in consideration over any expansion of use by PGE in the park. PGE should be required to use their capital monies to take the least impactful approach to their multi-stepped plan of expansion and upgrades. The cost should be borne by their shareholders (just like all the fire safety work they should have been doing for the past fifty years) and not be borne by the public's use and enjoyment of Forest Park, or the continuity of its forest and streams and wildlife.

Sincerely  
Mark Osborn  
2230 NE Klickitat  
Portland

**From:** [alissaknight@aol.com](mailto:alissaknight@aol.com)  
**To:** [Steele, Morgan](#); [Christine.Caruso@portlandoregon.com](mailto:Christine.Caruso@portlandoregon.com)  
**Subject:** Forest Park  
**Date:** Wednesday, December 4, 2024 8:57:48 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Thank you,  
Alissa Knight  
Portland Resident

**From:** [Dave King](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park and PGE  
**Date:** Wednesday, December 4, 2024 10:15:51 AM

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Thank you for being on the uncomfortable hot seat. I live across the river from Forest Park and enjoy the view daily. I think the idea of clear cutting a path for transmission lines is a bad one. First it would violate the prime directive of Forest Park which is to promote old growth. There are alternatives which would be better. If you permit PGE's path it would open a path to other violations of this beautiful and unique space.

Sincerely, Dave King 8716 N Edison, Portland, OR 97203 971 407 8658

**From:** [Hannah Bushway](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest park proposal  
**Date:** Wednesday, December 4, 2024 9:38:12 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sent from my iPhone



**From:** [Mary Morris](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Monday, December 16, 2024 6:14:59 PM

---

Please protect our trees in Forest Park. Sadly I was not aware of this proposal until today. I walk there several times a week, mostly in this area. I want to oppose PGE 's plan.

Thank you,  
Mary Morris  
Portland Oregon resident.

**From:** [Andrew VanDerZanden](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, December 4, 2024 6:50:29 PM  
**Attachments:** [image001.png](#)

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Greetings:

I am not going to regurgitate what the Bird Alliance of Oregon and other nature conversation groups have said about the Harborton Reliability Project. In looking at some of their messaging it feels appropriate and stated better than I could. I will also admit to some hesitancy to offering my opinion because I am always weary of falling victim to possible NIMBY activity.

That said I am extremely concerned with Portland General Electric's Harborton Reliability Project. My concern is that PGE has a history of not being forward thinking despite their rhetoric. Looking at the proposal I can't help but think that this is the quickest, easiest, and cheapest option in the short term which is why I am sure it appeals to PGE. It makes sense if you are not prioritizing land stewardship and the health of future generations of Portlanders. We need every tree we can get in the area, and I applaud the efforts of the Urban Forestry Department to do so. I am so happy to have been able to participate in their tree giveaway program hoping that I can do something small to help mitigate the effects of the climate crisis. PGE is a very large and capable corporation, and I would like to think that they can devise a better reliability project that preserves more trees and critical wildlife areas. If I can do my part, I expect that they can do theirs in addressing the climate crisis.

Considering that most Portlanders and PGE have stolen and caused grievous injury to the land, I would hope that discussion of the Harborton Reliability Project actively engages with the Indigenous peoples of the Columbia River and Willamette Valley. This is their land, and history has shown that they have been far better stewards of the land and far better at looking past the short term and gaging the impact of such activities on the future generations of Portlanders.

Thank you for your consideration and your work on behalf of Portlanders.

With appreciation,



Andrew VanDerZanden  
6910 SE 112<sup>th</sup> Avenue

Portland, OR 97266

he/him/his

[Andrew.VanDerZanden@outlook.com](mailto:Andrew.VanDerZanden@outlook.com)

503.473.2807

**From:** [jack mcwilliams](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Keep Portland Awesome  
**Date:** Wednesday, December 4, 2024 9:47:18 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Angel Caballero](#)  
**To:** [Steele, Morgan](#)  
**Subject:** SAY NO TO PGE  
**Date:** Wednesday, December 4, 2024 1:05:34 PM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration

Angel  
Portland resident

**From:** [Deborah Romerein](#)  
**To:** [Steele, Morgan](#)  
**Subject:** REJECT PGE's proposal to encroach on Forest Park  
**Date:** Wednesday, December 4, 2024 2:05:50 PM

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Forest Park is a refuge, a sanctuary for me and thousands of other Portlanders. I am a very frequent visitor to the park, as a hiker, walker, plant identifier and nature lover. It is Portland's gem right in the city and we must do everything possible to protect it. We must be good and faithful stewards of the places we love.

PGE's proposal directly contradicts the top priority in Forest Park Natural Resources Management plan to manage the forest toward old growth.

There are several much better locations outside Forest Park. Forest Park is our treasure.

Please I beseech you reflect PGE's proposal

Deborah Romerein  
503 887-8302  
Portland resident and Forest Park lover

**From:** [t harper](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Subject: Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 12:39:21 PM

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Greetings, For over 20 years I have tended a garden plot in Forest Park, at Adams Community Garden, and pulled ivy as I walked the Wildwood, Upper and Lower Macleay and Leif Ericson trails. It is a sanctuary in the city like no other. It's what makes Portland a special place to live, for people, birds and wildlife alike. I've found sensitive lichen species in the forest canopy, an indicator of good air quality. Forest Park is the heart of Portland. Its trees clean our air, filter our water and cool our city, and provide homes for wildlife and nesting birds.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all. Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multi-phase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that - more cut trees, stream degradation, and habitat loss. This is unacceptable.

I'm asking you to swiftly reject PGE's proposal for the sake of the trees, wildlife, birds and people.

thank you,  
t harper

t harper  
:: plant native plants ::

**From:** [mike Horner](#)  
**To:** [Steele, Morgan](#)  
**Date:** Wednesday, December 4, 2024 5:06:09 PM

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## Spectacular Treasure Forest Park

Greetings Ms. Steele

I landed in Portland more than 25 years ago. A sister of a friend I knew in Maine immediately said there were some things I must see and the first place we went was for a long hike on the Wildwood trail in Forest Park. It went on and on! Giant trees, ferns and streams, cool,delicious air. It was amazing. What city would capture prime Forest and desirable real estate and preserve it in perpetuity to become a real old growth forest again? Well, here we are. And oh yes, Sauvie Island was great and Multnomah Falls spectacular as well but the Crown Jewel of our fair city is Forest Park.

I looked into the Forest Park Natural Resources Management Plan which is the bedrock of the park. It is pretty simple really. The mission is to preserve and protect the park environs and habitat in such a way as to create an ancient forest again like what was here before the sad creation of Stump Town.

Our very self important utility PGE seems that they should be able to have an exception for their project while even acknowledging there are alternative routes they could develop outside of the park. Of course giving them a waiver would open the gates to every other self important entity to demand one as well. In the name of the sacred and now scarce red legged frog and all the people dreaming of giant old growth trees in the city limits, please do not disturb the bedrock. DENY THE PERMIT.

Thanks so much for your good sense,

Michael Horner  
4329 SE 64th Ave.  
Our Fair City



**From:** [Art Lover](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Forest Park  
**Date:** Wednesday, December 4, 2024 11:58:37 AM

---

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

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**PGE claims its work will not impact sensitive species, but this is a lie.** The route PGE plans to build the transmission line through is home to the red-legged frog — a federally recognized species of concern that is protected in Oregon — and some of the last remaining habitat for the red-legged frog in the region.

**PGE claims their restoration plans are adequate,** but the City of Portland stated in a letter that PGE’s proposed restoration plan would actually take a minimum of 80 years to mature, would allow invasive species to flourish, and would fail to mitigate the long-term effects of clearing.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

- Portland resident and frequenter to Forest Park.  
[Yahoo Mail: Search, Organize, Conquer](#)

**From:** [Jenny O](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 10:17:24 PM

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December 4, 2024

Dear Morgan Steele,

When I first moved to Portland, the first thing that struck me was how intertwined the city and nature are. I could be downtown, surrounded by skyscrapers, and then drive 5 minutes and be in old-growth forest. Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. If any of these alternatives qualify for PGE's project and don't contradict the stated priorities of the Forest Park Natural Resource Management Plan, these viable alternatives should be considered for the project.

Third, approving this project could set the precedent for future development in Forest Park. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss.

Please reject PGE's proposal.

Sincerely,  
Jenny O'Connor  
Portland citizen



**From:** [O.T](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 8:45:11 PM

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Hello!

My name is Otto Yunker, I'm writing to you today to voice my concern over PGE's proposal to clear cut 5 acres of Forest Park.

Forest Park is an important resource for the Portland Area, offering habitat for wildlife and refreshing respite for domesticated life. I have visited this park daily, and relied on it as a vital part of my small world.

The park provides services to the area that can not be adequately replicated, such temperature regulation, water retention, and filtering to name a few.

But to be more specific, here are some concerns to be raised in particular:

1. The Forest Park Natural Resource Management Plan prioritizes managing the forest so it may become Old Growth, a status that in the United States has a legal age of 150 years. The clearcutting proposal brought by PGE is not in line with this plan.
2. If PGE were to begin this project, it may expand beyond its currently outlined proposal.
3. Approval of this project could set a precedent for development of Forest Park.
4. Clearcutting in Forest Park is not necessary for PGE to provide services. PGE itself recognizes that there are other possible locations in their Alternatives Analysis.

It is for these reasons I am asking you to reject PGE's proposal LU 24-041109 CU EN GW

Thank you for your time and consideration,  
Otto Yunker

**From:** [Katie Hughes](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 8:02:12 PM

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Dear Morgan Steele,

I am writing as a trained urban planner, energy efficiency professional and long time Portland resident.

When I first moved to Portland over a decade ago I lived blocks from Forest Park. It was a huge reason why I fell in love with the city - I actually was married there. Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis from 2022 has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all. It is also concerning that this study was not shared until a couple of weeks ago.

Third, approving this project will set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious and unique resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the city and our environment - along with all of the issues outlined above regarding PGE's plan. We must not buy into the argument that time constraints outweigh the destruction of Forest.

Best wishes,

Katie Hughes

**From:** [Louise W.](#)  
**To:** [Steele, Morgan](#)  
**Subject:** LU 24-041109 CU EN GW (Harborton Reliability Project)  
**Date:** Tuesday, December 10, 2024 12:24:37 PM

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Dear Morgan Steele,

It is my understanding that the deadline for comment on the above-referenced project was December 4, 2024. I was made aware of this on December 3 and was in the process of reviewing all of the documents that I received from a kind neighbor on Riverview Drive.

I would very much like to comment as I live in the Marina Way Moorage at 13000 NW Marina Way and hope that my comments will be considered.

I thought that the Forest Park option was the only option that was being considered and did not know that other options might be utilized.

As a floating home resident in Marina Way Moorage, Option 4 would severely impact my husband and myself. The Forest Park option utilizing the existing easement granted by the City of Portland in 1971 seems the most feasible and logical pathway. We have a natural gas pipeline and oil pipeline on our roadway (NW Marina Way) as well as buried underground storage tanks in the vicinity. We are hoping that the primary option will be the chosen choice for PGE utilizing the existing easement into Forest Park.

Thank you for your consideration.

Louise Warshaw  
Marina Way Moorage  
13022 NW Marina Way  
Portland, OR 97231

**From:** [Lauren](#)  
**To:** [Steele, Morgan](#)  
**Subject:** No PGE clearcut in forest park!  
**Date:** Wednesday, December 4, 2024 8:12:25 AM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The NRMP’s main goals for Forest Park are to 1) Let the forest grow into ancient forest and 2) Protect and enhance its recreational/educational value. PGE’s project is not in line with either of these goals. The project also fails to meet criteria in the management plan, including because there are viable alternate routes for the project outside of Forest Park.

Signed,  
Lauren Verica  
Portland, OR resident

**From:** [Junix Seraphim](#)  
**To:** [Steele, Morgan](#)  
**Subject:** NO to PGE's Forest Park Clearcut  
**Date:** Wednesday, December 4, 2024 9:51:37 AM

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To whom it may concern,

I'm writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the "Harborton Reliability Project" powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park's management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog.

Additionally, PGE's powerline expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities. Protecting Forest Park from clearcutting is a genuinely climate smart action.

I am strongly opposed to this project due to its ecological and economic impacts on myself, the life in Forest Park, and all Portland residents. Please heed the people of Portland and refuse PGE's land use permit. Thank you for your consideration.

Sincerely,

Junix, Portland resident



**From:** [Chelsea Lincoln](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Oppose PGE plans for Forest Park  
**Date:** Wednesday, December 4, 2024 11:58:42 PM

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I am wanting to communicate my objection to the plans PGE has for forest park. I know the area well and volunteered to help the red-legged frogs in the area. The community has worked hard to preserve this unique and important population. The risk to the environment is too great and we have a responsibility to protect the area. We must say no to these plans. Thank you for listening.

Kind regards,

Chelsea Lincoln

**From:** [Sandy Weinstein](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PG&E project - 24-041109 CU EN GR  
**Date:** Wednesday, December 4, 2024 11:05:39 AM

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To Whom It May Concern:

I'm writing this email to voice my strong opposition to PG&E's plan to utilize a portion of forest park for utility transmission system enhancement. There are several reasons.

First, the plan is in direct conflict with the legally approved Forest Park Management Plan. Modifying this plan for this or any other purpose would be a violation of the original intent for what is widely known as one of the most amazing Urban parks in the United States. When my husband and I moved to the Portland area I was surprised and very pleased to see that the local government had the wisdom to preserve this Urban Forest. It has become a wonderful place for us to visit, walk and bird watch. The area under consideration is also one of the best preserved, most pristine acreage providing habitat to a large variety of plants and animals.

Second, it is impossible that there are no other viable options for PG&E to make their system improvements. Other options may have different costs and benefits, perhaps be harder to develop but to destroy a resource like Forest park is so short sighted. We have to be careful to preserve areas like this for our children and children's children. I would prefer to spend a few more dollars per month on Utility Services and preserve Forest Park. I believe that a significant majority of people living in our city would agree.

Third, I understand that the plan holds open the possibility that in the future there would be additional need to use other tracks of land. Opening up the park to development for this initial proposed project could very well lead the way to further destruction of this unique, amazing public resource.

Please do not make the mistake of allowing this project to proceed.

Thank you,  
Sandy Weinstein

**From:** [Tana Gutzka](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE development in Forest Park  
**Date:** Wednesday, December 4, 2024 10:32:13 AM

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Dear Ms. Steele,

I am writing to provide information for your consideration in whether or not to allow PGE to develop/increase infrastructure inside Forest Park.

While I understand the need for increased utility infrastructure, I encourage other options be utilized. With global warming, building additional towers, adding power lines and infrastructure inside a forest would likely have more potential for harm or injury to the public, along with nature, etc. Access for fire trucks looks to be much more difficult than it would be with other options.

I am opposed to PGE's proposal for development inside Forest Park as it does not meet the criteria for development laid out by the Forest Park Natural Resources Management Plan. Forest Park is a jewel and should be protected per the guidance set forth in the plan.

Thank you for listening.

Best,

Tana Gutzka

**From:** [Josh Simmons](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Development  
**Date:** Wednesday, December 4, 2024 3:26:06 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Laura Iwanaga](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE expansion in Forest Park  
**Date:** Wednesday, December 4, 2024 12:30:32 PM

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Dear Morgan Steele,

I am writing to oppose the proposed PGE expansion in Forest Park. It directly contradicts plans to preserve old growth forests. Approval of this project would set a precedent for future decimation of old growth stands. Forest Park is the jewel of Portland and must be preserved for current and future generations of Oregonians. Thank you for your attention to this.

Sincerely,

Laura Iwanaga

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Laura Iwanaga (she/her)

[Join Third Act Oregon!](#)

408-888-3480

[liwanaga1@gmail.com](mailto:liwanaga1@gmail.com)



**From:** [Donna Murdock](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Harborton Project Land Use  
**Date:** Monday, December 16, 2024 11:23:45 AM

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Dear Ms. Morgan,

I hope this email finds you well. I know that the deadline for comments has passed, but I was just made aware of this issue when the article was published on Oregonlive December 13, 2024. Many of us enjoy Forest Park daily and yet are not on the mailing list for the Forest Park Conservancy and so I, like most Portlanders, was not aware that this incredibly important decision is being made. That in and of itself is concerning. The project that PGE proposes to carry out in our beloved Forest Park is worse.

Clear-cutting 150+ year old Douglas Fir and Big Leaf Maple, removing White Oaks between 170 and 500 years old, filling two wetlands and disrupting two streams with another phase set to impact the Miller Creek watershed is unacceptable. It conflicts with the goals of the Forest Park Natural Resources Management Plan. The study done for PGE by Toth and Associates (2022) clearly shows several viable alternatives.

Please reject PGE's Land Use application on behalf of Portlanders who love Forest Park. It is one of the aspects of Portland that draws and keeps people here. It is a unique asset that the City needs to protect both for its beauty and peace ..and for the old and mature trees that our children need for their carbon sequestering benefits and their role in wildlife habitat.

Sincerely,  
Donna Murdock  
2821 Ne Everett St  
Apt B10  
Portland, Oregon 97232

**From:** [Sarah Taylor](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE in Forest Park  
**Date:** Wednesday, December 4, 2024 10:27:48 AM

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Good morning,

As a Neighbor who lives in Forest Park, the PGE plan feels dangerous. If there is a fire caused by the plan, we have no current way to get out of the hill or park. Until the city addresses the current safety concerns, they shouldn't think about a new risk.

We are blocked with no river access , so fire house and no way to get out of the forest.

Additionally you will be driving wildlife into residential neighborhoods. And further blocking wildlife corridors.

The city has shown no concern for the Linnton neighborhood and so shouldn't be asking for favors now.

Sarah Taylor  
Linnton

**From:** [Kate Foulke](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE in Forest Park  
**Date:** Wednesday, December 4, 2024 8:56:09 AM

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Dear Ms. Steele:

Please do not allow PGE to site their facility within Forest Park! As you know, more appropriate sites exist. Portland is going through tough times. Please do not contribute further to the erosion of what makes Portland a beautiful, healthy and nurturing environment for humans and all the other flora and fauna that sustain us.

Most sincerely,

Katherine Foulke



**From:** [Kevin C](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE work in forest park  
**Date:** Wednesday, December 4, 2024 1:48:18 PM

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Hello - I have read everything I can find regarding PGE's proposed work in forest park. In summary I am adamantly opposed to the work being approved. I have hiked and biked literally every trail in forest park. It is unique and already at risk in many ways due to non native species etc. I have read PGE has other alternatives but from what I can see they have not been transparent about them. I believe other alternatives should be pursued even if more costly/complicated which I suspect is why PGE just wants to go cut down trees in forest park.

I am not an expert but I know mitigation is not the same as leaving it alone. The mitigations described seem to be one time and hope it helps not any ongoing management.

Please hold PGE accountable to finding a solution that preserves forest park. Once it's cut down it's cut down. I do understand infrastructure needs to be improved and hardened however I think it's time we stop the use of such unique forest land so close to our city to accomplish it.

Thank you for your consideration.

Kevin

**From:** [Natasha](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please reconsider  
**Date:** Wednesday, December 4, 2024 5:34:29 PM

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Hey there,

I am writing to ask Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion.

I and many friends of mine have enjoyed the park and it is a huge asset to the city. Already surrounded by so much infrastructure, cutting more of these trees down would wreak havoc on the ecosystem. Such a large and beautiful park in the middle of the city is a huge asset to the area and memories of visiting this park have stayed with me for many years. Especially cutting down old growth which are needed in our environments; is not something that can be replaced or undone. Our land is not disposable.

Sincerely,  
Natasha

**From:** [Tiana Gilliland](#)  
**To:** [Steele, Morgan](#); [christine.caruso@portlandoregon.gov](mailto:christine.caruso@portlandoregon.gov)  
**Subject:** Portland Permitting and Development  
**Date:** Wednesday, December 4, 2024 2:10:56 PM

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Hello Morgan and Christine,

I urge you not to do the Portland Permitting and Development project to the forest park. It is not right to put damage forwards the environment there. Please listen to the people who are not in support of this.

Sincerely,  
Tiana Gilliland

**From:** [Kate F](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Powerline expansion proposal -neighbor to Forest Park feedback  
**Date:** Thursday, December 5, 2024 8:54:55 PM

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Hello Morgan,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents, especially as somebody who lives and operates business on two lots that share a border with Forest Park. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Sincerely,

Kate Fulton

Sent from my iPhone

**From:** [Iris Smith](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protect Forest Park  
**Date:** Wednesday, December 4, 2024 12:12:20 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

**From:** [Selene Capparelli](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protect Forest Park  
**Date:** Saturday, December 7, 2024 4:15:16 PM

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Hello Morgan,

I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims

that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE's data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE's project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE's land use permit. Thank you for your consideration.

Selene Capparelli

**From:** [Meghan Robinson](#)  
**To:** [Steele, Morgan](#); [Caruso, Christine](#)  
**Subject:** Public Comment - Meghan Doherty - LU 24-041109 CU EN GW - PGE Expansion @ Forest Park  
**Date:** Monday, December 9, 2024 11:19:06 AM

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Dear PP&D,

My name is Meghan Doherty and I am a resident of the Portland Roseway neighborhood, a regular visitor to Forest Park, and an environmental policy professional specializing in environmental justice issues. I am writing to strongly urge PP&D to **deny the land use permit currently being sought by PGE** for the proposed “Harborton Reliability Project” powerline expansion.

Forest Park is a critical natural resource for our city. As previously recognized by the City, this proposal would cause significant harm to the park, undermining its management goals, disrupting bird and wildlife populations, and negatively impacting recreational spaces cherished by Portland residents.

After reviewing the Forest Park Natural Resource Management Plan, I believe this proposal is in direct conflict with the intent and principles of the plan. The ecological and recreational value of Forest Park far outweighs the potential benefits of this project.

I am also concerned about the necessity of the proposal and believe greater study, justification, and transparency are needed. Activist groups have presented compelling evidence that the primary driver of this expansion is industrial growth, benefitting entities like Intel and the utility provider, PGE. It is concerning that these beneficiaries would bear little to none of the proposal’s environmental or social impacts, which would instead fall disproportionately on the general public and the Forest Park ecosystem.

The proposed mitigation efforts appear grossly inadequate and would take decades to restore the ecosystem to its current strength—if at all. Additionally, I believe that not all viable alternatives, including the “no action” alternative, have been fully considered. Based on the information available, these alternatives are far preferable to the proposed project.

For these reasons, **I am firmly opposed to this project** due to its detrimental ecological and economic impacts on Portland residents, myself included. Moreover, PGE’s proposal fails to comply with the Forest Park Natural Resource Management Plan. I respectfully urge you to deny PGE’s land use permit application.

Thank you for your time and consideration.

Sincerely,  
Meghan Doherty

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Meghan (Doherty) Robinson | [meghanpdoherty@gmail.com](mailto:meghanpdoherty@gmail.com) | 773.315.9503



**From:** [Jooyoung Oh](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comment  
**Date:** Wednesday, December 4, 2024 10:00:37 PM

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Hello, I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Jooyoung oh, Portland resident  
Former Multnomah country employee

**From:** [Winsome Eustace](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comment  
**Date:** Wednesday, December 4, 2024 5:08:56 PM

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I am writing to urge Portland Permitting and Development to deny the land use permit currently being sought by Portland General Electric (PGE) for the “Harborton Reliability Project” powerline expansion. As the City previously noted, the Harborton Reliability Project would cause significant impacts to Forest Park and the surrounding ecosystem, undermining Forest Park’s management goals, harming bird and other wildlife populations, and impacting recreational areas popular to Portland residents.

The project would require the clearcutting of at least five acres of forest along the powerline corridor, including in an area that provides crucial habitat for the imperiled Northern Red Legged Frog. These impacts are directly in conflict with the Forest Park Natural Resource Management Plan.

While these 5 acres would be clearcut, the impact is broader than is limited to that space. Nature does not observe the borders we attempt to put around it. The carbon absorbed by some of these old forests impacts us collectively and destruction does too.

Additionally, PGE’s power line expansion will not benefit Portland residents, but rather create energy infrastructure investments for the rapidly expanding technology sector in Hillsboro including facilities like the Intel expansion project. While the utility claims that the project is needed for growing electricity demand due to climate smart electrification, it is clear when looking at PGE’s data that the vast majority of increased demand is coming from these tech facilities.

I am strongly opposed to this project due to its ecological and economic impacts on myself and other Portland residents. Moreover, PGE’s project proposal fails to comply with the Forest Park Natural Resources Management Plan. Please refuse PGE’s land use permit. Thank you for your consideration.

Winsome Eustace  
Portland resident

Old growth forests are not a renewable resource.

Sent from my iPhone

**From:** [Terry Moody](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Public comment: Opposition to PGE's Harborton Reliability Project in Forest Park  
**Date:** Wednesday, December 4, 2024 9:52:20 PM

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To Morgan Steele and/or Whom It May Concern:

I am writing to express strong opposition to PGE's proposed Harborton Reliability Project, which fundamentally conflicts with the Forest Park Natural Resources Management Plan (NRMP). The main reason I chose to relocate to Portland was Forest Park. It has been a sanctuary for me and others I know and I was deeply disturbed to receive news that its integrity is in question. I only wish I had found out sooner and hope this reaches you soon enough.

The NRMP's core objectives are to grow an ancient forest and protect the park for education and recreation. PGE's proposal directly undermines these goals by:

1. Proposing to clear-cut 4.7 acres of 150+ year old trees, including five white oak trees estimated to be 170-500 years old, which directly contradicts the plan's priority of managing towards old growth.
2. Ignoring viable alternatives identified in the Toth report that could locate transmission lines outside Forest Park. The document clearly shows alternative options exist that do not require destroying this critical ecosystem.
3. Setting a dangerous precedent for future development. By approving this project, we risk opening Forest Park to further destructive phases, potentially impacting up to 15 additional acres and disrupting critical wildlife habitats.

It seems that the ecological impact extends far beyond the immediate cut area being proposed. The project potentially threatens over 200 species of interest, including at-risk species like the northern red-legged frog, and could trigger invasive species proliferation, increased landslide risk, and irreplaceable ecosystem damage.

Portland residents like myself chose this city for its commitment to environmental preservation. This project betrays that commitment.

Sincerely,

Terry Moody

**From:** [Laura Feldman](#)  
**To:** [Steele, Morgan](#)  
**Subject:** re: Clearcutting Forest Park  
**Date:** Wednesday, December 4, 2024 4:39:38 PM

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I am 70 years old. I grew up in North Portland, on the peninsula and throughout my life here, Forest Park was a glorious given. Now, like much else it's threatened by greed, at a time when we can little spare green buffer zones like this park that will help anchor us during the worst of the climate crisis.

Oh, I am weary of trying to speak truth to bureaucrats or profit-mongers who can see no further than their paychecks, their profits in a time of survival--for themselves and for their children.

Long after rapacious, short sighted industry is gone, this story of what takes place here, the lack of stewardship that impacts life here on the lower Willamette will be your legacy. Think about it. Better yet, feel about it.

- 1) Enhance life here by growing an ancient forest and
- 2) Protect/enhance the forest for education/recreational opportunities.

PGE, the city of Portland could be the heroes of this story, the far-sighted entities that helped preserve and grow nature in this city.

Why not? Not much else to lose.

Laura Feldman  
Portsmouth Neighborhood  
Willamette River Advocacy Group

**From:** [G Mend](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:17:10 PM

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Morgan Steele,

Living in Portland for 18 years has been the greatest privilege. For 18 years I have lived and learned in this beautiful city where nature and urban landscape seem to coexist beautifully. The natural world here has nurtured my community, supported my physical and mental health, taught me compassion, understanding and patience. The beauty of this city has also shown me the importance of environmental activism.

Morgan, the scientific importance of our natural spaces should not be lost on anyone. Temperate forests around the world represent *one third* of the global forest [carbon sink](#). Wetlands, grassy fields and forest floors alike represent areas of storage for carbon that would otherwise be trapped in our atmosphere as excess heat and pollution. Our trees complete the essential function of reverting carbon emissions to fresh and clean oxygen, a process which is absolutely vital to maintain the health of a fast-growing city like Portland. Trees also filter our water and prevent erosion.

But time and time again I have had the misfortune of observing natural spaces fall at the hands of greed and blind ignorance, which is now in the cards for our very own Forest Park.

The City of Portland MUST vote to reject Harborton Reliability Project, PGE's proposal to develop 4.7 acres of Forest Park. When enacted, this project would eliminate two seasonal streams, precious wetlands and old growth trees. These actions would destroy crucial habitat for the precious red-legged frog which has been known to thrive in this section of Forest Park. Furthermore, PGE's development plans are in direct violation of the Forest Park Natural Resources Management Plan, the top priorities of which are to grow an ancient forest and to maintain it for educational and recreational opportunities. PGE claims to have a mitigation plan, but the plan to replant native shrubs is nowhere near viable.

Please vote against this project. Forest Park is a precious resource with infinite ecological, financial, and social value. Allowing PGE to so harshly develop this precious resource would only set a precedent of overlooking important ecological documents like the Forest Park Natural Resources Management Plan. The City of Portland must maintain a history of holding developers accountable for the land they influence in order to protect a forest that is the very host of Portland's beauty, health and happiness.

Thank you for your time.  
Gracella M.

**From:** [Chelsea Stewart-Fusek](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 6:36:48 PM

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Hello,

The following is my comment on the Harborton Reliability Project. Thank you for considering!

Forest Park is the reason I was able to move to Portland many years ago--I am not a city person, and know that my happiness is tied deeply to how natural my surrounding environment is. So, I applied only to schools that weren't *too* far from nature (there weren't very many that fit the bill). Very old trees once blanketed the map here, providing for the northwest's most iconic flora and fauna and introducing wood to the Willamette and Columbia Rivers, creating habitat for the salmon that once thrived on their runs. These trees cleaned the air and stored carbon, too. Now, pull up Portland on Google Earth to be reminded of just how few trees remain--most of them in Forest Park.

Harborton Reliability Project may take just 5 acres during this initial phase, but Forest Park does not have 5 acres to spare. This project will also pave the way for subsequent phases that could result in up to 15 acres being logged to power a Hillsboro data center and other industrial consumers, which is completely unacceptable and out of line with Portland's purported climate goals. Even at this earlier phase of the project, the proposal directly contradicts the Forest Park Natural Resources Management Plan by reducing the amount of old-growth forest in the park and diminishing future educational and recreational opportunities (as these are directly tied to the forest remaining intact). Further, the alternatives analysis demonstrates that there are other alternatives that exist that do not involve logging Forest Park. These alternatives must be utilized.

In addition to the impacts this project would have on myriad wildlife species that rely on Portland to keep their last remaining habitat intact, clear-cuts increase erosion and wildfire risk. This would place the surrounding community--and in the case of extreme fire weather, all of Portland--at significant risk of loss of life and property.

Please represent the interest of Portlanders rather than corporations. Please reject this project as proposed to preserve our clean air, wildlife, culture, and safety.

Thank you,

Chelsea Stewart-Fusek

**From:** [Kelly Carmody](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 1:49:45 PM

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Dear Morgan Steele,

I'm writing on behalf of the proposed PGE Harborton Project. I was born in Beaverton and now live in Portland. I have grown up with Forest Park as my backyard and I've chosen specifically where to live based on access to this park. I remain grateful and proud of the park as an Oregonian. When I saw the proposal from PGE I was compelled to write to you because of the impact it could have on the future of Forest Park, its surrounding communities, and its plants and animals.

First and foremost, my greatest concern is that this is only phase three of the project and it is unclear if PGE knows the full impact of the final two phases or if they are waiting to share them so as not to receive further pushback. Either way, it does not fill me with confidence in PGE's ability to think long-term and holistically. I believe that we deserve to know the entire impact on Forest Park due to this project, not only phase three.

As PGE has stated, there are alternative sites which have not been fully shared with the public. How are these alternatives worse for the public? How are they worse for the park? How are they worse for our climate change goals? Why are they not being considered? These are questions we deserve to know. It is unclear to me if this proposal is best for the people of the greater Portland Metro area or if it is cheapest and quickest for PGE and PGE only.

I also implore you to consider with high regard the lives of the trees, animals, and plants which will forever be altered and lost to future generations. A 150 year old tree replaced by a new seedling will never reach 150 in our lifetime, it is gone for good. Once they are gone, no matter the excellence of a habitat mitigation plan, these are trees and habitat that we cannot get back. Additionally, I am skeptical of PGE's commitment to their mitigation plan. If you walk along a powerline corridor in the park today, you will see endless weeds and invasive plants. Does PGE plan to become a steward of the land in a way that is long-term and sustainable or do they hope to complete a few mitigation projects and then pass off the stewardship to Portland Parks and Rec which is ultimately funded by the people of Oregon. How is PGE holding themselves accountable to making the park a better place?

I appreciate your time and thought in this. I know whichever decision you make, you will have weighed and listened to all arguments and for that I am grateful. I have carefully considered the pros and cons of this plan and recognize the need for renewable and safe energy, but at the end of the day with many alternatives left unexplored and many questions still to answer, the loss of this habitat in Forest Park is too great a cost.

Sincerely,  
Kelly Carmody

**From:** [Katie Irwin](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 12:57:42 PM  
**Attachments:** [Forest Park PGE.docx](#)

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Dear Morgan Steele,

When I first visited Forest Park seven years ago, I was astounded. Right at the edge of a bustling major metropolitan city, I found myself in a lush, dense, well-maintained old growth forest that was brimming with life. It almost didn't seem real. I grew up on the East Coast, where I played in the woods throughout my childhood. I've lived in the Midwest, spent time in preserved Florida forest and swampland, and traveled to many different places across this country and experienced a variety of landscapes. Forest Park is one-of-a-kind. It's a resource the city of Portland can be proud of; it's a model example of how people living in cities can co-exist with wild nature in their own backyards. It's a place I look to when I feel distressed about the climate crisis and the future of wild spaces. Simply put, Forest Park is a treasure.

As an avid outdoorsperson deeply invested in the wellbeing of wildlife and their habitats, PGE's proposal to develop inside of Forest Park is incredibly concerning for multiple reasons. First, PGE's proposal violates the mission established in the Forest Park Natural Resources Management Plan to grow, preserve, and enhance the forest toward old growth. Clear cutting nearly five acres of forest, particularly in an area of interior forest habitat that houses seasonal streams and provides a refuge for migrating songbirds, would create devastating consequences for those migratory birds and other birds, mammals, fish, and amphibians who currently reside in or rely on that riparian habitat. While PGE has offered to replant saplings in the potentially impacted site, those saplings would require 100 years to restore what PGE destroyed. Furthermore, young trees are not a good faith solution to clear cutting old growth, as they do not provide the same habitat required to sustain the forest plants and animals that rely on it.

I'm also concerned about PGE's proposal because the company seems committed to developing inside of Forest Park when viable alternatives exist. PGE's own Alternative Analysis demonstrates there are other feasible potential project sites outside of Forest Park. Why is PGE intent on Forest Park as the location for its project? What is unacceptable about these alternative sites? It's possible for PGE to pursue its proposed project at a different location, one that would avoid destroying valuable forest habitat and disrupting the wildlife who call it home.

Finally, I'm worried that if PGE's proposal were approved, such approval would authorize PGE to make claims to further develop within Forest Park in the future. PGE has alluded to additional phases of expansion beyond this current proposal. If this proposal is approved and PGE is allowed to destroy forest habitat, it seems logical that PGE would later argue that additional phases of expansion must continue along the same route – through more of Forest Park. Approving this project may unknowingly establish a precedent that makes it more difficult to prevent PGE from developing more of Forest Park in the future. That seems too uncertain of a risk to accept.

Forest Park is a haven – to birds, wildlife, plants, and the people who live in and move through Portland. In this time of plummeting bird populations and widespread habitat destruction, it is crucially important to protect the habitats and their inhabitants that continue to thrive. Forest



Park is one of those very special and important places. In the name of the wild creatures who cannot speak for themselves, I'm asking that you reject PGE's proposal. The Forest Park Natural Resources Management Plan clearly supports that position.

Sincerely,  
Katie Irwin, Ph.D.

*\*I've attached a Word document with a copy of my comments.*

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Katie Irwin

[FOG + FEATHER Photos](#)

*I make fine art giclée prints picturing landscapes and wildlife in and around the Pacific Northwest.*

**From:** [Steven Dannen](#)  
**To:** [Steele, Morgan](#)  
**Cc:** [sdannen@gmail.com](mailto:sdannen@gmail.com)  
**Subject:** RE: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 12:57:19 PM

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Dear Morgan Steele,

When I was searching for a city to relocate to from California, I read as much as I could about the recreational opportunities available in Portland. I was amazed that Forest Park was designated over 100 years ago and is right next door. This is a pristine area that was set aside many years ago so that it could remain intact and be available for generations to come and enjoy.

When I heard about PGE's proposal to clear cut an additional path through this beautiful and rugged area and replace it with mono-culture vegetation to install more eyesore power lines I was saddened.

This area is precious and delicate and should be protected from corporate development.

PGE indicated there are alternate routes they could use. I suggest that these should be carefully evaluated and vetted before destroying such a beautiful old growth area that is our legacy to pass on.

I feel that approving this project will set a precedent and green light anyone's future attempts to compromise our beautiful park.

I urge you not to let PGE move forward on this project through Forest Park.

Sincerely,  
Steven Dannen

**From:** [Emily Pinkowitz](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 12:23:55 PM

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To Whom It May Concern:

Forest Park is a treasure not only to all people in the Portland Metro Area, but also to the many animals that call it home. When the impacts of climate change are being felt across our region, we need to be doing everything we can to preserve older trees until they reach maturity. I am writing to request that you reject PGE's proposal, known as the Harborton Reliability Project, to demolish 4.7 acres of forest in the northernmost section of Forest Park.

I am concerned about PGE's proposal not only because I care deeply about the park but because it directly violates the Forest Park Natural Resources Management Plan in three key ways:

1. **PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.** Cutting down 100+ year old trees and replacing them with new trees will lead to irreversible setbacks in our progress towards achieving old growth in this part of the park. This is especially concerning because the area contains mature Western Red Cedars, a vital part of the PNW ecosystem. Young trees of this species are dying throughout the region, finding it harder and harder to establish due to climate change. If we cut down these trees, there is a strong likelihood that they will not be able to be replaced.
2. **PGE's Alternatives Analysis shows there are several possible locations outside Forest Park.** The NRMP indicates that if other options are available, these should be pursued in place of demolishing parkland. Yet PGE withheld their Alternate Analysis until the last possible moment in this process in an attempt to dodge public pressure to explore alternate locations.
3. **Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park.** The NRMP requires that the *entire park* be managed towards old growth. Yet PGE has indicated this proposal sets in motion a chain of further asks that will demolish more parkland in future years. We can't allow this to happen.

Again, as a concerned citizen that loves and values the Portland's unique commitment to wild and green spaces, I ask you to reject PGE's plan.

Thank you,  
Emily Pinkowitz  
Portland Resident

**From:** [Frann Michel](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 12:17:57 PM

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Dear Morgan Steele,

Please reject PGE's proposal.

I am really appalled to learn that PGE may be allowed to undermine the health of Forest Park and the priorities of the Forest Park Natural Resources Management Plan by destroying trees to lay down power lines--especially when there are alternative locations PGE could use outside of Forest Park.

When I first moved to Portland, some thirty years ago, I lived in the northwest neighborhood and went walking in Forest Park weekly. It was, and is, a refuge, a place of beauty, a sanctuary for wildlife, and an ecological treasure. The trees there help clean the air, filter the water, cool the city. I now live on the east side of town, but I still visit Forest Park several times each year. I love it; it helps me stay grounded and healthy. I am heartbroken at the idea it is under threat, and needlessly.

The two main goals of the Natural Resources Management Plan (NRMP) are to grow an ancient forest and to protect and enhance the forest for education and recreational opportunities. PGE's plan is definitely not in line with those priorities. PGE's own Alternatives Analysis shows that there are several possible alternative locations outside Forest Park. Clearly, then, there is no need, even in their own view, to damage our civic treasure and violate the NRMP. Moreover, if PGE gets approval for this fiasco, it could set a precedent for future phases of PGE's project and other development in Forest Park.

PGE evidently does not care about the Portland community that will be affected by this or about the 'community resiliency' the project purports to support. They delayed releasing information about alternatives; they did not meaningfully amend their proposal to reflect community feedback; and they have not been transparent about their future plans.

I hope and trust that our government will be more responsive and responsible than PGE has been.

Please reject PGE's proposal.

Thank you for your attention.

Frann Michel, Ph.D.  
fmichel@willamette.edu  
Portland Resident  
97214

**From:** [Robert Weinstein](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 12:11:02 PM

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It is my understanding that December 4, 2024 is the last day for public comments regarding PGE's proposal to expand its operations impacting Forest Park. I'm writing in opposition to PG&E's plan.

Prior to my retirement, I worked for many years as a consultant to both public electric utilities as well as utility commissions. Based on my experience, the proposed PGE plan should not be approved. I am certain that other viable options exist that would enable PGE to make the system improvements it believes are needed, without impacting Forest Park. While other options may be more expensive, the additional cost, spread over the entire customer base would be minimal.

Furthermore, approval of PGE's plan would be in direct conflict with the legally approved Forest Park Management Plan and would be a violation of the original intent for Forest Park, our county's largest urban forest.

Please do not approve this project. Preserving Forest Park should be the city's priority.

Sincerely,

Robert Weinstein

Dec. 4, 2024



## Intertwine Alliance opposition to PGE Harborton Reliability Project proposal

Dear City of Portland staff,

I'm writing today to express The Intertwine Alliance's great concern about PGE's proposed Harborton Reliability Project. The proposal directly contradicts the Forest Park Natural Resources Management Plan (NRMP) and sets a dangerous precedent for future phases of expansion in the park.

The Intertwine Alliance is a Portland-Vancouver regional coalition of 80 public, private and nonprivate partners advocating for investments in parks, trails, natural areas and equitable access to nature. Forest Park is unique in the nation, a model urban ecosystem of exceptional quality. Protecting its habitat and ecosystems is a high priority for the members of our coalition and the communities they represent.

Top among our reasons for opposing the plan:

1. It's hard to get around the fact that the plan directly contradicts the **top priority** of the Forest Park Natural Resources Management Plan, which is to manage the forest toward old growth. Cutting down mature trees and replacing them with saplings does not align with this goal. In fact, PGE's proposal blatantly fails to meet *most* of the criteria of the NRMP.
2. PGE must prove that there are no other viable options to development in Forest Park, but its own analysis shows that there *are* several alternatives. It is possible to update their power grid without impacting Forest Park. These alternatives must be more thoroughly and transparently explored before we allow incursion into one of the most secluded, species-diverse and sensitive areas of the park, which includes at least two seasonal streams and 150+ year old trees.
3. We are deeply concerned that approval of this project would set a precedent for future phases of PGE's project and even more development in Forest Park. PGE has already stated that this will be a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that more cut trees, stream degradation, and habitat loss.



The City, in its laws and policies, has already decided that Forest Park is an ecological and cultural resource that must be strongly protected. Please follow through on the criteria listed in the NRMP, and do not approve this project as currently proposed.

Thank you for your time and good work.

Tara Wilkinson, Director  
The Intertwine Alliance  
[tara@theintertwine.org](mailto:tara@theintertwine.org)



**From:** [marc.alifanz@gmail.com](mailto:marc.alifanz@gmail.com)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW Deadline to submit: Dec 4, 2024  
**Date:** Wednesday, December 4, 2024 10:58:15 AM

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To the City of Portland Permitting Department,

I submit this response regarding the proposed PGE Harborton Reliability Project (Permit Application No. 2024-041109-000-00-LU). As I understand it, PGE has sought approval for a 1,400-foot westward alignment connecting to existing high-voltage lines in Forest Park. I support this alignment, as it minimally impacts vegetation and habitat while offering robust mitigation measures. I oppose alternative routes along Highway 30, Marina Way, or Riverview Drive toward Sauvie Island Bridge, which would also affect sensitive areas but with significantly greater logistical challenges as well as adverse impacts to the people who live and work in that area.

The proposed alignment, as detailed in PGE's application and supporting materials, is shorter, more direct, and less disruptive. The extensive data and thorough responses provided by PGE substantiate its suitability over alternative options. Conversely, a northward route would significantly harm vegetation, disrupt property owners, impair scenic views, and unnecessarily increase overhead utilities, degrading neighborhood aesthetics.

Given PGE's mitigation commitments, proven resources, and responsible track record, the proposed alignment is the most logical and least impactful choice. I urge approval of the westward alignment.

Sincerely,

Marc Alifanz  
13610 NW Riverview Dr.  
Portland, OR 97231



**From:** [Shauna McKain-Storey](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:35:08 PM

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Dear Morgan Steele,

When I first moved to Oregon 30 years ago, I was lucky enough to live a short drive away from Forest Park. I was amazed to learn that it was perhaps one of the biggest parks in an urban area and was teeming with wildlife. I walked there often, and always brought out of town visitors there. Forest Park is a treasure, not just for the city of Portland, but for the entire state of Oregon. I live farther away now, but the park still holds a special place in my heart, as I'm sure it does for many. Forest Park also evidences a truly historic, longstanding commitment to preserving green spaces for biodiversity, wildlife and recreation for our citizens. And its trees clean our air, filter our water, and cool our city. We all need to recognize how valuable a resource it is, and that any damage done to it will be difficult or impossible to heal as climate change can make young trees and biomes more vulnerable to drought and disease. PGE's proposal to develop inside Forest Park fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan, and is concerning for many reasons:

- 1) This proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings does not align with this goal.
- 2) PGE's own analysis indicates several alternative locations outside Forest Park for this project. It is therefore possible to update their power grid without impacting Forest Park at all.
- 3) What is most alarming is that approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and more loss of mature trees, habitat and healthy streams and wetlands.

We need to treat Forest Park as the precious resource that it is! I'm asking you to please consider current and future Portlanders and Oregonians, as well as wildlife, trees and irreplaceable ecosystems, and that you reject PGE's proposal.

Sincerely,

Shauna McKain-Storey

**From:** [lynneeley](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN G  
**Date:** Thursday, December 5, 2024 8:29:26 AM

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Dear Morgan Steele,

I moved back to Portland where I grew up in University Park primarily because of the proximity to Forest Park. The familiar sound of the trains were reverent echoes of my past. The view of the forest everyday as I carried out my daily tasks.

I take the dogs to Forest Park 3 or 4 times a week. We listen to the streams cascading down the hills. We've seen a family of owls living there, and a buck that crossed the path and stopped and looked at us. It has become a very healthy ritual to breath fresh air and escape the city.

In the last 3 years, the sound of the trains carrying fossil fuels to unload and pick up 10 blocks from my house fills me with fear of an explosion, derailment and disaster should the earthquake hit.

The air is not so fresh anymore! I smell a concoction of fossil fuels weekly where I live and half the time I drive through Linton to get to the wildwood trail. Recently I've even smelled it inside Forest Park!

The proposal to replace old growth forest with more of the CEI Hub directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project.

Carrying out the project would set a precedent for future development in Forest Park. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that—more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan and would result in significant ecological and cultural loss.

Please reject PGE's proposal.

Sincerely, Ednalyn Neeley

**From:** [Jeff & Erin Fitzpatrick-Bjorn](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 18, 2024 1:59:39 PM

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Ms. Steele,

We highly encourage you to work to steer PGE toward one of its alternative sites outside of Portland's majestic and unique Forest Park, as their current proposal does not align with Forest Park's management plan.

Sincerely,

Jeff & Erin Fitzpatrick-Bjorn  
Tigard

**From:** [Veronica Reeves](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Saturday, December 7, 2024 11:03:24 AM

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Hi Morgan,

My family and I rely on the intact beauty of Forest Park and the sense of well being found in knowing that the park and all its nonhuman residents are protected. This proposal would impact these things. Humanity needs to think more creatively about its land use.

Thank you.

-Veronica Reeves

**From:** [Germana de Falco](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Thursday, December 5, 2024 7:19:32 AM

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Dear Morgan Steele,

I moved to Portland from Austin, Texas about 16 months ago. I have spent the last year hiking and exploring all of the beautiful parks and green spaces this city and its surrounding areas provide. I am constantly blown away by the diversity and sheer magnitude of the trees here. So when I heard that PGE is planning to develop inside of Forest Park, and sacrifice so many old growth, majestic trees as part of that project, I was truly horrified.

PGE's plan blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal. Apart from the lost diversity, it takes monoculture oaks over 100 years to reach maturity.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. In a world where the environment constantly loses to human infringement, I believe it is very important to fight back however we can., especially when alternatives are available. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,  
Germana de Falco

**From:** [Lisa Gorlin](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:09:05 PM

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Dear Morgan Steele,

I am a 21-year resident of Portland. Forest Park is part of why I fell in love with the city and has been a source of pride and much gratitude as I have walked and biked its trails over the years. I am grateful that the Forest Park Natural Resources Management Plan exists to protect and preserve this valuable natural resource. The main goals of the Forest Park Natural Resources Management Plan are to grow an ancient forest and protect the forest for education and recreational opportunities. These goals preserve the legacy of Forest Park as envisioned by its architects and the Forest Park Committee of Fifty which is now the Forest Park Conservancy.

With the Forest Park Conservation Initiative, Forest Park Conservancy and its partners have created a visionary roadmap to restore and protect not just the park, but the surrounding ecosystem totaling more than 15,000 acres. Forest park is an important component of this larger ecosystem. It is crucial to consider the impact of what happens in Forest Park on the ecosystem of surrounding areas. Failure to do so will perpetuate the loss of our valuable tree canopy and create more heat islands, threatening the safety of our community in the face of the effects of a rapidly changing climate.

PGE's proposal goes against the goals and objectives of the Forest Park Conservancy.

PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.

PGE's Alternatives Analysis shows there are several possible locations outside Forest Park. Those avenues must be followed instead of desecrating the park.

Approval of PGE's project, future phases of PGE's project and any other proposals for development in Forest Park will set a bad precedent for more destruction and devastation of our precious natural resources.

It is imperative that PGE's faulty plan is rejected and I strongly urge you to do so. This nearsighted plan does not serve the citizens of the city and does not align with the vision of those who established the park and the values of the majority of us who live here. We want our city to remain livable.

Thank you.

Sincerely,

Lisa Gorlin

"It is true that some people look upon such woods merely as a troublesome encumbrance standing in the way of more profitable use, but future generations will not feel so and will bless the men who were wise enough to get such woods preserved." -John L. Olmstead

“Woodland areas are the great life-giving elements in the City” -Edward H. Bennett

**From:** [Elissa Mendenhall](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 10:52:04 PM

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To whom it may concern at the city of Portland.

I am writing in interest of the red legged frogs and their fragile habitat in Forest Park. Forest Park is a unique resource and a critical identity point of of the city of Portland.

When I first heard about this proposal for PGE to utilize and endanger five significant acres of habitat within the forest, I thought to myself, surely there must be an alternative to this. And indeed, there is an alternative. I am in favor of PGE finding that alternative and using that.

This is important not only to protect the already vulnerable species of red legged frog, but to continue to prioritize Forest Park as an old growth habitat, and to not set a precedent of prioritizing industry, business or housing over the precious habitat and ecosystem that is Forest Park.

Thank you for your kind attention.

Sincerely,  
Dr. Elissa Mendenhall, ND



**From:** [Lycia Shaffner](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 10:48:53 PM

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Hello Morgan,

I learned about the PGE proposed use of Forest Park through the Bird Alliance.

I understand it's important to have a stable grid. PGE just removed large branches from our ash tree to give 10 feet of clearance from the power lines. Maybe the damage will bring the EAB to the tree and it will ultimately be lost. We have to accept the damage to our city trees in exchange for fewer power outages. I hope we have more room to take an alternative approach for Forest Park.

I've copied below the key points I learned from the Bird Alliance.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Regards,  
Lycia Shaffner

Sent from my iPhone

**From:** [Brett Rousseau](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 10:07:01 PM

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Dear Morgan Steele,

I grew up in Portland's wild edges and as a result have had a lifelong love of the forest. I returned to Portland a few years ago to pursue a career as an arborist and am in awe of our diverse and beautiful urban forest. But what I love most about Portland - and what I think sets Portland apart from other "green" cities around the country - is the proximity of Forest Park, so expansive and pristine, to the bustle of urban life. I live in the Linnton neighborhood and within minutes of leaving my front door I am immersed in a world of moss-covered Doug fir trees and licorice ferns sprouting from Big leaf maple trunks. It is a world I am so excited to share with my 1 month old baby. It is in this forest that I plan to teach him about our native plants and instill a sense of place and wonder for the natural world.

I am proud that Portland has a designated wild space, protected from urban planning and industrial expansion so that it can mature into an old growth forest. However PGE's proposal is a direct threat to Forest Park's Natural Resources Management Plan and its meaningful mission. PGE has shown that there are other locations to increase transmission lines, so why allow them to ruin precious forest? Approval of this project not only jeopardizes the proposed acreage but also sets a precedent for future clearing of the forest.

Forest Park is a rare gem, amidst increasing canopy loss and urban development. Once trees are cut down and a forest ecosystem is degraded, we lose not only this unique habitat for native and endangered species, but the opportunity to commune with nature so close to city life. And we all know everyone could use a little more nature in their lives.

Please reject PGE's proposal. For the sake of our generation and all those yet to come.

Thank you,  
Brett Rousseau

**From:** [Cindy Shepard](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 9:06:35 PM

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Greetings,

Like many others who frequent Forest Park, I was shocked to hear about PGE's proposal to not just cut 4.7 acres but another 15 acres in the future in the name of "infrastructure." Forest Park is a vital resource to the humans, wildlife, and plant life that called it home and use its trails. It's what makes Portland one of the best places to live for those who enjoy nature and the outdoors. It's expanse and proximity to city center makes it one of the most accessible natural areas in the U.S. Forest Park is what I look forward to nearly everyday after work and is consistently one of the best parts pf my life. We are so lucky to have this resource.

Allowing PGE to go through with this plan would be devastating and irresponsible for three reasons.

- 1) The proposal directly contradicts the recommendation of experts who manage Forest Park who insist it would be detrimental to the flora and fauna.
- 2) PGE hasn't properly explored alternatives--an infuriating fact. While other avenues exist for PGE to accomplish its goals, Forest Park would be forever and irreparable damaged. Nature should NEVER be sacrificed in the name of expediency while options exist.
- 3) Allowing PGE to follow through will set a dangerous and disappointing precedent for more harmful projects. Denying the proposal will send a message that we value this priceless resource and discourage further proposals.

Please protect the ever-dwindling and invaluable green spaces this earth (and we) so desperately needs.

Thank you,  
Cindy S.

**From:** [Paige Mackmer](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 8:20:31 PM

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Hi,

I'm writing to express my very strong disapproval of PGE's proposal to clear trees in forest park as part of their Harborton Reliability Project.

There are other places PGE could utilize that wouldn't involve destroying nearly 5 acres of priceless urban forest. Forest Park exists because we prioritize having urban forest, especially old growth forest. We can't compromise that for the sake of short term gains, not even for important utilities. PGE can come up with another plan because no part of forest park can ever be sacrificed.

PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. PGE's Alternatives Analysis shows there are possible locations outside Forest Park.

Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park

**From:** [julia.ghiselli@icloud.com](mailto:julia.ghiselli@icloud.com)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 7:22:27 PM

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Dear Morgan Steele,

I am originally from Northern Virginia, but I call Portland my home ever since I came here to study Spanish and Environmental Ethics & Policy at the University of Portland. The first time I saw Forest Park across the Willamette River, I was absolutely struck by the beauty of the trees and the lush green. Forest Park is also the home to University of Portland's runUP club, of which I am the co-president. Spending time in the lush, green woods during weekend mornings in community with each other and with nature has been the highlight of this semester for me. Combined with my personal connection to Forest Park, and my environmental studies, I am committed to making sure these unique and sparse wild spaces are not any more disturbed. It is for the betterment of our health, which leads to a better Earth community for all of us.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations. Please reach out to me if there is anything else I can do. Thank you for taking the time to read this email.

Sincerely,

Julia Ghiselli

**From:** [kevin.geraghty](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 6:34:28 PM

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I am writing to express my strong opposition to PGE's's current "Harborton reilability Project" proposal. Felling of over five acres of mature forest and attendant access roads and ground disturbance in the northern portion of Forest Park seems entirely inconsistent with the park's Natural Resources Management Plan.

PGE appears to be asserting that there are no alternatives to this proposal. Of course there are alternatives; PGE just wants this one because it thinks it's easiest and cheapest. But that is not a good reason to acquiesce.

I know well the area proposed for this destructive development. It is in fact one of the botanically richest areas in the park, and contains quite a few species not found elsewhere in the park. A check of regional herbarium records turns up quite a few specimens from there.

PGE's management of exisiting power line corridors within the park is not exemplary. During the last few years, for example, power line crews have felled mature oaks and ashes (both a rarity in the park) out of the "oak patch" running along the lower border of the park, for no discernible reason, since these are species without great height potential. Large swaths of the PGE easement are choked with invasive himalayan blackberry. Proposed mitigation should be evaluated in the light of this history of the utility's indifference to the park's natural resources. Past actions speak larger than mitigation plans.

Sincerely,

Kevin M Geraghty  
3913 Densmore Ave N  
Portland, OR 97217

**From:** [Moe Bowstern](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Don't Clearcut Forest Park  
**Date:** Wednesday, December 4, 2024 11:04:18 AM

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Dear Morgan Steele,

I've lived in Portland since 1996, and have been visiting Forest Park since my first visit to portland in 1990. Whenever I host visitors from other cities I proudly bring them to our local forest, and tell them about its long history and how it is home to many native plants and animals. It's ecosystem is so important especially during these years when rapid growth has felled so much of our urban canopy. I am certain that Portland can come up with a better plan than to accommodate a private corporate interest. PGE's proposal is concerning for these reasons that have been ide tided by trusted groups working in the interest of all residents, not just those invested in corporate development:

1. PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.
2. PGE's Alternatives Analysis shows there are several possible locations outside Forest Park.
3. Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park.

Now is not the time to engage in wholesale habitat destruction of a cherished shared resource that belong to the citizens of Portland. Do not clearcut Forest Park.

Thank you so much for your time,  
Sincerely  
Lara Mulvaney

**From:** [salina holden](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 5:13:56 PM

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How do we fight?! I like other Portlanders are tired of the corporations taking and running everything. We have allowed them to control to many things in our personal daily lives and now they want to destroy and control our precious forests and trees, right in our backyard. I will help in anyway I can.



**From:** [Kathleen Boylan](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 5:06:05 PM

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Dear Morgan Steele

When I was considering moving to Portland from Atlanta I came for a visit to check it out. The very first place my sister who lives here took me to was forest park. I was so blown away by the spectacular Beauty that I decided then and there to move. Seven years later Forest Park is still my favorite part of Portland. Whenever I'm feeling down I head for the park to be among those ancient trees. This healing space always lifts my spirits

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project.

Third, approving this project could set the precedent for future development in Forest Park. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss.

Please reject PGE's proposal.

Sincerely, Your

Kathleen Boylan

**From:** [Madeleine Jones](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 3:52:47 PM

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Dear Morgan Steele,

Thank you for taking the time to read this and include it in the report you will be making. I have read that PGE states that time is the critical issue that limits alternative options to using Forest Park. To all those who are pushing for PGE to use this land, I urge you to please at least take a walk through it first and appreciate the time it took for this forest to grow into what it is today. Is this really so urgent that we have to destroy something that has taken so many years to grow?

Thank you,  
Madeleine Jones

**From:** [RM Jensen](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 3:40:02 PM

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Dear Morgan Steele,

In 1992, my octogenarian neighbor, Dorothy Wustrack, inspired me to protect nature locally by getting involved. Dorothy, alongside Barbara Walker and others, had fought developers 2 decades earlier to preserve and establish Marquam Nature Park, and her passion led me to volunteer with Friends of Marquam Nature Park for 31 years. Now, after our merger with Forest Park Conservancy, I serve as board secretary for FPC and remain dedicated to protecting all of Portland's forests.

Forest sanctuaries like Marquam and Forest Park are invaluable in that they provide clean air, water, diverse and resilient ecosystems, wildlife habitat, and improve peoples' mental and physical health. Old-growth forests are particularly vital for our region's ecological health. **The Forest Park Management Plan envisioned safeguarding Forest Park and its future as an old growth forest. PGE's proposal directly contradicts this top priority of the plan.**

After attending 2 of the 3 PGE public outreach sessions in August and October, **I still don't think that PGE has thoroughly considered the alternatives to running the lines through Forest Park.** I asked PGE about reconductoring their lines, which they claimed would not provide them with enough capacity, yet in a [The New York Times](#) ("The U.S. Urgently Needs a Bigger Grid. Here's a Fast Solution" 4/9/24) article it says: "In many places, upgrading power lines with advanced conductors could nearly double the capacity of existing transmission corridors at less than half the cost of building new lines, researchers found." and an article in [MIT News](#) ("Startup aims to transform the power grid with superconducting transmission lines" 6/26/24) claims that "superconducting cables can conduct 5-10 times the power of conventional transmission lines, using essentially the same footprint and voltage level." I also question their dismissal of the option of running the lines up NW Marina Way. This alternative would not impact Forest Park at all.

Lastly, PGE has not revealed their plans for further phases of this project which are likely to impact Forest Park even more. There are 15 acres they admit may need to be clearcut in the future. **Allowing them to clearcut 4.7 acres now may set the precedent needed to conduct further development in the park that will continue to erode and contradict the Forest Park Resource Management Plan.**

Please reject this proposal before more damage is done to this precious and irreplaceable treasure. Every acre counts.

Respectfully,

Robin M. Jensen, Forest Park Conservancy, Board Secretary  
rmjensen88@gmail.com  
503.799.8435

**From:** [Dianne Ensign](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 3:38:19 PM

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Dear Morgan Steele,

I have lived in Portland my entire life, and I have great respect for Forest Park as a unique urban wilderness. I appreciate the roles it plays in providing essential wildlife habitat and an oasis for solitude and quiet for hikers. I am deeply concerned about PGE's proposal to update and expand their power grid infrastructure. This proposal would severely impact 4.7 acres of maturing wildlife habitat in Forest Park. I urge the city of Portland to reject PGE's proposal.

PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. PGE's mitigation plan is inadequate: removing 150 year old maturing trees, and replacing them with a monoculture of oaks which take 100+ years to reach maturity, does not come close to replacing the unique impacted habitat. It is very disturbing to me that ecosystem function would be lost through significant disruption of two streams and permanent filling of two wetlands. Furthermore, the NRMP requires that mitigation take place in the same unit that is impacted: PGE's plan to fund habitat enhancements in other units of the park does not meet that requirement.

I am also concerned that approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park, further conflicting with the management plan. PGE has not been transparent about their plans for future phases and its impact on habitat. PGE's Alternatives Analysis shows there are possible locations outside Forest Park, that should be further studied.

Please reject PGE's proposal. Thank you for your consideration.

Sincerely,

Dianne Ensign

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**From:** [Claire Christy-Tirado](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 3:37:02 PM

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Dear Morgan Steele,

Born and raised here in Portland I grew up spending weekends exploring the beautiful trails of Forest Park. Now as an adult, my appreciation for this incredible resource has only deepened when I think about how folks living within this city have forest trails less than 10 minutes away that are accessible not only by car, but by public transit. These trails are invaluable not only because of the many species they nurture, but because of their accessibility (physically and financially) to everyone. These trails, including the extensive trails stretching across the NW hills are what make this city great and unique. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is deeply concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan. Forest park is an invaluable resource that needs to be protected and conserved and should never be at risk for development.

**First** and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

**Second**, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

**Third**, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,

Claire Christy-Tirado

**From:** [Tara Lemezis](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 3:33:05 PM

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Dear Morgan,

When I first moved to Portland, I couldn't believe the beauty that surrounded me, including the iconic Forest Park. I could be downtown, surrounded by skyscrapers, and then drive 5 minutes and be in an old-growth forest. Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, for wildlife and us!

**PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.**

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,  
Tara Lemezis  
97220

**From:** [Elizabeth Draper](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 3:26:12 PM

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Dear Morgan Steele,

As a native Oregonian and Portlander, Forest Park has served as an incomparable natural treasure, as a "go to refuge" throughout the seasons and years. On hot summer days, I can escape to the cool and damp of the forest canopy. In the autumn, I marvel at the dappled sunlight that captures the changing colors of leaves while the migratory birds take a much needed rest. Each season within the park has its draw for me as I stand witness to an intertwined ecosystem of life. Charles Jordan, our Park Commissioner, in 1995 said, "You will not find any place in America, an urban park so close to the heart of the city that provides the wilderness experience five minutes from downtown. Forest Park is unique and priceless."

There are numerous reasons why PGE's proposal to develop inside Forest Park are concerning. I'm shocked by the fact that it is clearly incompatible with the Forest Park Natural Resources Management Plan.

First, the proposal is in clear opposition to the primary goal of the management plan of protecting, supporting and sustaining a forest that is becoming an old growth forest. Logging five acres of the North Unit and replacing the diversity with one or two species does not align with this goal. Many species of animals rely on the established existing biodiversity within these acres.

Secondly, PGE has stated through their own analysis that other alternatives are possible for their project that would not have lasting negative impacts on Forest Park. In my humble opinion, those options would be an obvious alternative and would not disrupt the natural fabric of Forest Park.

Thirdly, choosing to approve this project would be in clear opposition to the Forest Park Management Plan-setting a precedent for future projects that would only serve to compromise more deeply the one true treasure Portland still holds in its care.

Since this would be the first part of a multifaceted project that would not stop with the development of five acres. This would clearly be the first of additional phases to an ongoing expansion with increased habitat loss and compromise to the streams and surrounding forest.

I have a myriad of concerns with PGE's proposed development. It is incompatible with the Forest Park Management Plan. It would result in the loss of significant ecological diversity negatively impacting the forest integrity for generations to come. Forest Park is a treasure, as Charles Jordan stated, "priceless." and we need to treat it as such.

Please reject PGE's proposal so tomorrow's forest friends and forest dwellers can thank us for maintaining the treasure that presently exists among us.

Sincerely,

Elizabeth Draper





**From:** [Ann Rasmussen](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 3:22:37 PM

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Dear Morgan Steele:

Portland's park system is a wonderful part of the city, and Forest Park's size and management make it unique in Portland and across the country.

PGE's proposal to develop within Forest Park is concerning. It violates the park's management plan, and once this land is taken, we cannot replace it. It fragments habitat within the park, and it sets a precedent that parks are available for development. Alternative plans exist that don't damage the unique resource that is Forest Park.

Please reject PGE's proposal to build within the park.

Sincerely,  
Ann Rasmussen

**From:** [Dr. Kiki Sanford](#)  
**To:** [Steele, Morgan](#); [Hearings Office Clerks](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 2:34:03 PM

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Dear Morgan Steele,

I just became aware of the plan proposed by PGE to compromise 15 acres of Forest Park habitat for energy infrastructure.

While the need for upgraded & more energy delivery systems is essential to the continued growth of the Portland urban area, it appears that this particular plan is being pushed through the review process inappropriately.

The Toth report on the plan is not readily accessible on the Portland.gov website for the public to access. Additionally, the focus on using ecologically valuable forested land rather than fully assessing alternative options in a timely & transparent manner is unacceptable.

This city is beautiful and will grow & thrive if we focus on goals of sustainability & ecological connection. Compromising important human values with short-sighted actions will only serve a minority of vested interests.

I ask you to reject this proposal to ensure that the people of this city and the land it is built on are properly prioritized.

Sincerely,  
Kirsten Sanford

**From:** [lane.walling@gmail.com](mailto:lane.walling@gmail.com)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 2:29:26 PM

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Following the recommendation of bird conservationists and forestry experts, I urge you to deny PGE's planned project. This is not what our citizens want, and this is not the kind of city I believe Portland to be. Forest Park is a jewel in this town and destruction of it cannot be undertaken so lightly. It is more important than ever to protect old growth forests. Do not let this be a precedent by which further development continues to destroy our beautiful nature.

Thank you for your attention to this matter.

Sincerely,  
Lana Walling  
97210

**From:** [Claire Viarengo](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 2:08:03 PM

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Re:LU 24-041109 CU EN GW

Dear Morgan Steele,

As a physician I am acutely aware of the importance of nature in maintaining physical and mental well being, which are, of course linked. Throughout history the importance of the natural world has been recognized through the creation of urban sanctuaries for living creatures and the biological systems that sustain them. Portland is blessed with Forest Park thanks to the foresight of our predecessors. We cannot afford to allow this treasure to be fragmented and disturbed.

I oppose PGE's proposal to develop within Forest Park, the Harborton Reliability Project, for the following reasons:

- Old growth forests are a resource that we must cultivate for the health of our ecosystem. The PGE plan to harvest mature trees and plant saplings is in opposition to the main goal of the Forest Park Natural Resources Management Plan: to support Forest Park in redeveloping an old growth forest
- There are alternatives that PGE itself has identified for updating the power grid, noted in the Toth Report. These alternatives would spare Forest Park and thus allow restoration of old growth forest land.
- With this project PGE will lay down a precedent and start the ball rolling on a process that will continue to erode the splendor of Forest Park, a natural wonder.

I hope that you will reject this proposal from PGE because of its impact on the forest, streams and living creatures that rely on this treasure. This is an optional solution for PGE. Let them choose a different option, one that does not sacrifice the many benefits of this unique piece of our city that needs to be protected, as outlined in the Forest Park Natural Resources Management Plan.

Thank you for your consideration.

Sincerely yours,  
Claire Viarengo, MD

**From:** [Piper Wyrick](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 1:38:36 PM

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To Morgan Steele and the City of Portland,

I'm writing to say that during this decision on PGE's Harborton Reliability Project, you need to protect Forest Park. It is not only the city's greatest treasure, but also an extremely valuable area for wildlife, and in these days of increasing climate change and devastating natural disasters, we need to seriously protect everything we can.

PGE's project, as it is now proposed, involves clear cutting a large chunk of Forest Park. However, it isn't just losing 5 (or 15) acres of a city park, it is targeting an part of it that is rich in wildlife diversity. It is weakening the overall ecosystem of one of our strongest, largest and most pristine urban forests. The proposed project, if allowed, will destroy habitat for threatened northern red spotted frogs and many other species, as well as salmon spawning area. Destroying the ability for various species to live, as well as decreasing the resources, and relatively protected areas in general, will make it harder for plants and animals to find what they need. Disturbing the forest will additionally pave the way for invasives already choking too much of this city, such as blackberry and english ivy.

Other options are available, and PGE knows it. They have known it for years, even if they did not make these other options public until recently. This lack of transparency, combined with their failure to amend their application after feedback from the public, feels like they are not in it to do the best for the people of Portland. That is where the government needs to step up. We as individuals are doing all we can, but it is up to you as the people who have the most power to make larger and therefore more impactful decisions to do the right thing.

I grew up in Portland, and Forest Park was an important staple in forming who I am. I grew up mountain biking and hiking amongst those trees as a small child, back when to us it was "the Fairy Forest." Even the memory of dropping a beloved, not to mention pristine white, stuffed animal in a large mud puddle at the base of the Cherry Trail remains vivid. Though I no longer call it the Fairy Forest, it remains just as magical to so many of us. "Outdoorsy Pacific Northerwester" can be a bit reductionistic, but my passion for wild spaces, and the importance of the environment to all our lives, is not.

If you approve this phase of the Harborton Project, it will be a quick and slippery slope for PGE to later say that their current phase 5 idea is the cheapest option – and we would lose 15 more acres of Forest Park.

The Harborton Reliability Project directly contradicts our Forest Park Natural Resources Management Plan, the main goals of which are to support and enhance the park's ecosystems, and grow it into an ancient forest, as well as our values as a city. Do the right thing and protect Forest Park.

**From:** [Kari Hallenburg](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 1:05:08 PM

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Attn: Morgan Steele

I want to express my serious concern about the PGE proposal to develop within Forest Park. Forest Park is one of the crown jewels of Portland, and preserving it and maintaining its integrity is so very important. It's benefits to the city and our population are immense — sanctuary for wildlife and people, trees for our health and the health of the planet (this is no time to be cutting trees), recreation, education about our natural world, and so much more.

The PGE proposal appears to have serious concerns in that it would not meet the development criteria detailed in the Forest Park Natural Resources Management Plan, which supports the permanency and health of this mature forest. Clear-cutting and planting saplings is a far cry from the plan. From the information I've gathered, there appears to be viable alternative locations for this project. And, this sort of project would likely create precedent for future projects of this sort.

Forest Park is a valuable resource and an absolute gem, and we need to preserve it and care for it. PGE's plan does not align with Forest Park Natural Resources Management Plan, and is certainly not in the best interests of our city and our natural resources.

Thank you for your attention to this,

~ Kari Hallenburg  
11574 SW 16th Drive  
Portland, OR 97219

**From:** [Judith Dayal](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 12:46:51 PM

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Dear Morgan Steele,

As an avid runner, Forest Park has become my sanctuary, my place to escape the chaos of everyday life. Whether I'm winding through its trails or simply enjoying the sounds of nature, it's where I find balance, clarity, and calm. It's vital for my mental and physical well-being, and I know it's a place that many others in our community rely on in the same way.

Forest Park is not just a space of beauty and respite; it is a critical natural resource. Its trees filter our air, its land supports countless wildlife, and its peaceful environment helps cool and cleanse our city. The park provides us all with something invaluable: a connection to nature in the middle of an urban landscape. We are incredibly fortunate to have such a place, and we must protect it at all costs.

That's why I am deeply concerned about PGE's proposal to develop within Forest Park. This plan runs directly counter to the values that make the park so vital to our city and our lives. It blatantly fails to meet key criteria set by the Forest Park Natural Resources Management Plan:

First, the proposal goes against the park's top priority: to become a thriving old-growth forest. Cutting down mature trees and replacing them with saplings disrupts that process and jeopardizes the park's future.

Second, PGE's own analysis confirms that there are alternative sites outside of Forest Park where the project could be carried out. There is no need to disturb this vital sanctuary to upgrade the power grid.

Third, approving this project could set a dangerous precedent for future developments in Forest Park, opening the door to further destruction of the park's ecosystem. PGE has already stated that this is just the first phase of a larger project. More power lines, more trees cut down, more harm to streams and wildlife—it would be devastating.

Forest Park is not just a park; it's an essential part of our lives, and it deserves to be protected. The proposal to develop within it is not just a threat to the environment but a threat to all of us who rely on this park to rejuvenate, refresh, and reconnect with nature. Please, reject PGE's proposal for the sake of all the runners, hikers, wildlife, and Portlanders who find peace in this amazing place.

Sincerely,

Judith Dayal

**From:** [Laura McMullen](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 12:42:34 PM

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Dear Morgan,

I strongly oppose PGE's proposal to develop almost 5 acres of Forest Park. Forest Park is not only a beautiful recreational gem of our city, unique in its grandeur and feeling of nature surrounded but such an urban environment, it is also an ecological stronghold. While the land can be relatively quickly demolished or developed, the landscape would take hundreds of years to recover from such a catastrophe.

I write both as a 12 year citizen and parent in Portland, OR, as well as from my position as a local PhD ecologist, managing a PNW fisheries and aquatics team at a consulting firm. The benefits from this plan in no way outweigh the detriment that would come from destroying wetlands, streams, forest cover, old growth trees, and nesting habitat for birds.

Please reject this proposal from PGE, for the goodness of our citizens, future, and the important ecological elements and wildlife of our City.

Thank you,  
Laura

Laura E. McMullen, PhD  
[laurabethmcm@gmail.com](mailto:laurabethmcm@gmail.com)  
503-308-2789



**From:** [markvib@interserv.com](mailto:markvib@interserv.com)  
**To:** [Steele, Morgan](#)  
**Subject:** FW: Forest Park: LU 24-041109 CU EN GW  
**Date:** Wednesday, December 25, 2024 5:19:31 AM

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Dear Morgan Steele,

As a member of the Skyline Crest Neighborhood Association, my neighbors and I echo the sentiments of Susie Livingstone's comments below. It would be a shame if PG&E did not pursue alternatives.

Thank you.

Mark S. Vibbard  
607 NW Skyline Crest Road  
Portland, OR 97229  
[markvib@interserv.com](mailto:markvib@interserv.com)  
520.250.4628

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**From:** Susie Livingstone <[susie\\_livingstone@yahoo.com](mailto:susie_livingstone@yahoo.com)>  
**Sent:** Wednesday, November 27, 2024 7:40 AM  
**To:** Steele, Morgan <[Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)>  
**Cc:** [kchin@birdallianceoregon.org](mailto:kchin@birdallianceoregon.org)  
**Subject:** Forest Park: LU 24-041109 CU EN GW

Dear Morgan Steele,

When I first moved to Portland I wasn't planning on staying here. But then I went for a hike in Forest Park & fell in love. I was so excited to have an amazing place to hike, recharge & enjoy just outside my door that I ended up staying here. I love that no matter where I go in Portland or Vancouver I can see the park.

PGE's proposal to develop inside Forest Park is appalling to me on so many levels. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan:

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal and would leave a scar on the park for years to come and be visible for miles. Just take a ride out to the coast on 26. So sad.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update

their power grid without impacting Forest Park at all.

- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that—more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss.

I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people who live and visit here, the city, and for future generations.

Sincerely,

Susie Livingstone

**From:** [Marianne Mauldin](#)  
**To:** [Steele, Morgan](#)  
**Subject:** RE:LU24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 3:33:08 PM

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Hello Mr. Steele

I have been a resident of Portland Oregon my entire life. Forest Park has been a haven of tranquility, beauty and respite for me. I am 73 years old.

PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.

Please protect this beloved park.

Warm regards,  
Marianne Mauldin  
4335 NE 40th Ave.  
Portland, OR  
97211

**From:** [Lindsay Thurwachter](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Thursday, December 19, 2024 1:20:09 PM

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Forest Park has been an inspiration since I moved to Portland. I have never lived in a city that has such a beautiful refuge. I have fallen in love with birding, walking, and appreciating our natural world through Forest Park. Just last week, I was lucky enough to see the Elk herd on top of skyline and it brought tears to my eyes that we have enough land here to help keep a large mammal herd healthy and happy here. This magical place must be protected. I moved to live close to Forest Park because I love it so much and volunteer at the Bird Alliance to give back to this beautiful place.

PGE's proposal is very concerning and needs to be stopped for a few different reasons. PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth. Why on earth would we clear cut a part of Forest Park when PGE ( a for profit company) has feasible alternatives outside of our beloved park. Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park. This is horrid and should be stopped.

Please reject PGE's plan to build in Forest Park.

Thank you for your consideration, Lindsay Thurwachter

--

Cheers, Lindsay  
She/Her

"The greatness of a nation and its moral progress can be judged by the way its animals are treated." - Mahatma Gandhi

**From:** [Tara Hopebringer](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 12:13:32 PM

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Morgan Steele,

I am writing to express opposition to the harborton reliability project and proposed PGE clear cut in Forest Park. This would irreparably harm a sensitive part of Forest Park, one with a seasonal stream and critical wetlands for the threatened red-legged frog, and one with mature trees including oak.

I love to hike in Forest Park and have been to the area proposed for this cut on a bird watching outing. I have seen the stream and the 100+ year trees all around it. The 2 main goals of the NRMP for Forest Park are to 1) grow an ancient forest and 2) protect/enhance the forest for education/recreational opportunities. PGE's proposal directly contradicts both of these goals. The cut would remove mature trees and allow invasives to flourish. And the mitigation plan is wholly inadequate.

PGE's Alternatives Analysis shows there are possible locations outside Forest Park. These must be explored. Furthermore, approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park.

The increase in electrical demand is not being driven by residents, but by industry, specifically data centers. This transmission line is in perfect position to supply Intel, and future phases of the project would increase the amount of ecosystem damage. Residents should not have to pay higher rates for transmission lines and electricity that will go primarily to the private sector. PGE has not been transparent about their plans and future phases.

I urge you to deny this project. Do not undermine the health and beauty of Forest Park and it's biodiversity for the benefit of corporations.

Sincerely,  
Tara Hershberger  
Portland, OR 97220

**From:** [Karly Chin](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:54:20 AM

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Dear Morgan Steele,

When I first moved to Portland, the first thing that struck me was how intertwined the city and nature are. I could be downtown, surrounded by skyscrapers, and then drive 5 minutes and be in old-growth forest. Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Removing down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,

Karly Chin



**From:** [flora.rudolph](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:41:58 AM

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Dear Morgan Steele,

Forest Park is a precious sanctuary that, left intact, will only grow more dynamic and invaluable. It is my refuge and place to deeply connect with nature and one of the main reasons I live close. It is a violation to even consider destroying part of this delicate and diverse ecosystem- this rare gem that Portland has cultivated. The five acres proposed for clear cutting to put up power lines is home to countless living plants and animals and cannot be replaced. Many of these trees are over 100 years old. I treasure being able to go to Forest Park to clear my head, exercise, explore the many life forms and to leave rejuvenated.

Portland has taken steps in the past to give this land permanent protections and PGE proposes to change that and to open the way for more clear cutting and devastation in the future. **The 2 main goals of the established NRMP law are to 1) grow an ancient forest and 2) protect/enhance the forest for education/recreational opportunities.** PGE's proposal directly contradicts these goals.

It seems clear that PGE has not fully investigated other sites that do not involve this destruction and leave Forest Park intact.

I cannot believe that Portland city govt. would choose to allow PGE or anyone else to violate and destroy this beautiful place. Portlanders love and cherish Forest Park.

Please, please do not allow the PGE proposal to go forward.

Thank you,

Flora Rudolph

Flora Rudolph  
503-754-5250

<http://www.meetingtrees.com>  
<http://www.meetingtrees.com/rooted-joy-17-ways>  
<http://www.meetingtrees.com/tree-speak>  
<http://www.meetingtrees.com/tree-cards>  
Certified Teacher of Presence, Eckhart Tolle



**From:** [Lisa Hull](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 11:13:30 AM

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Dear Morgan Steele,

I moved to the Portland area in 1990 and worked in the NW neighborhood for 27 years. I first discovered Forest Park from a distance riding the bus to work down I-5. I was amazed at the beautiful, undisturbed forest in the middle of a city! My curiosity was peaked; I had to see it up close. I did that multiple times a week over my 27 year career in NW Portland. To this day, I seek the tranquility, views of wildlife and beauty of the natural world in the park to comfort my body/soul and restore my faith in mankind.

I am disturbed on several levels that PGE is proposing to clear cut a portion of Forest Park to enhance the power grid:

- It goes completely against the Forest Park Management Plan and commitments made in 1948 to preserve the Park.
- PGE has indicated there are alternative sites for this project that do not involve Forest Park. Why would those alternatives not be considered?
- I understand there are additional future phases to this project. Locating this phase in Forest Park would likely result in additional future destruction of Forest Park.
- Wildlife and habitat would be destroyed at a critical time when we should be doing everything possible to preserve fauna and flora that is often easily sacrificed to "progress". Many species have been severely diminished over the last half century. This project would exacerbate this destruction.
- Critical carbon sequestering resources would be destroyed at a time when leaders should be considering every possibility to protect them. It would take 150 years to replace the trees in the area proposed to be destroyed.

Forest Park is a gem for the people who reside in the Portland metro area. PGE's proposal does not honor Forest Park's management plan, and would result in significant ecological and cultural loss. Please reject PGE's proposal for the reasons laid out in this message. If we are willing to sacrifice to this request, what other sacrifices will then be expected? Please keep Forest Park whole for the trees, the wildlife, the people and future generations.

Sincerely,

Lisa Hull

**From:** [Sara Sebastian](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 10:26:21 AM

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Dear Morgan,

I would like PGE to reconsider their plan to construct on 4.7 acres of Forest Park. Please, protect Forest Park and its creatures at all costs! Surely, PGE can build on land that already has concrete on it.

Sincerely,  
Sara Sebastian

*Sara Sebastian* (she/her)  
[sarasebastian.co](http://sarasebastian.co)

**From:** [Alex Rogers](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 10:14:27 AM

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Dear Morgan Steele,

When I moved to Portland more than 3 years ago, I was drawn to the region because of its commitment to the preservation of our forested areas. I take a lot of pride in Forest Park, it is a special place that make our city unique and special. It enables hundreds of thousands of people to enjoy the beauty and benefits of the forest within city limits.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. **I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.**

Sincerely,  
Alex Rogers

**From:** [Ann Turner](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 9:56:01 AM

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Dear Morgan Steele,

I am a retired primary care physician, retired from a career in community medicine working with underserved families, many of them farmworkers. We know that the climate change that we are already experiencing will impact marginalized, minority, frontline communities. I am now a volunteer with Oregon Physicians for Social Responsibility, an organization of health professionals and public health advocates working collaboratively with community partners to educate and advocate for societal and policy change that protects human health at the local, state, national, and international level. We seek a healthy, just, and peaceful world for present and future generations.

I, therefore, strongly oppose approval of PGE's project to place power lines through Forest Park. One of the best ways to protect our planet for future generations is carbon sequestration in our forests, including our own Forest Park. Forest Park is a precious jewel in the Portland Metro area for its beauty, its habitat for birds and all wildlife and one of the best recreational areas right here in Portland. Even more important is that Forest Park is a solution to protecting our climate by supporting it to become an old growth forest. Specifically, PGE's plan to cut down mature trees in Forest Park violates its Natural Resources Management Plan to support Forest Park's becoming an old growth forest. In addition to seriously degrading the forest and wildlife habitat, it also increases the risk of forest fires, a risk that we should not permit under any circumstances.

If PGE is permitted to move forward with this project, it can then easily ask to do this in other areas of the Park. PGE has determined in its analysis that there are other routes. Please require that PGE find other routes.

We know that climate change is the single greatest threat to global health. Forest Park is part of the solution. We must not destroy it by allowing PGE to build power lines through Forest Park.

Ann Turner, MD  
2007 NE Mason St.  
Portland, OR 97211

**From:** [Maureen Dannen](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Re:LU 24-041109 CU EN GW  
**Date:** Wednesday, December 4, 2024 8:44:55 AM

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Dear Morgan Steele,

Years ago, as I was driving through Portland on my way to somewhere else, I made a brief stop to see the park that so many people had told me about. A short hike on a nearby trail left me stunned and amazed by the fact that such a sprawling oasis for nature existed right next to Portland. Little did I know at the time that I would be moving to this area of Oregon in the years to come. I have since explored Forest Park numerous times, always reveling in the fact that this gem exists next to an urban area. It's a beautiful expanse of land filled with wildlife, an abundance of tree species and understory growth providing habitat for wildlife, streams, fragrant air, wildflowers. It's a place to find peace in the midst of a busy life, and it is valuable beyond measure.

When I heard about PGE's proposal to develop inside Forest Park, I was immediately concerned about the impacts that would have on the park. First of all, in the Forest Park Natural Resources Management Plan, the top priority is to support the forest so that it can become an old-growth forest. It makes no sense to cut down mature trees and replace them with saplings. This misguided "mitigation" would potentially set the plan back by hundreds of years.

Secondly, If PGE needs to update their power grid, it is up to them to find alternatives that won't impact this sensitive, pristine area. They have indicated that there are viable alternatives.

My third point is that approving this project would set a precedent for future development in Forest Park. PGE has already indicated that future projects will be coming, and if they are allowed to start now, it's only a matter of time before more expansion occurs, further compromising the habitat so crucial to the health of the park.

Forest Park is unique and irreplaceable. I am urging you to NOT let PGE move forward with this plan. Please protect the trees, wildlife, the people who value this treasure of a park, the city, and all the generations to follow.

Sincerely,

Maureen Dannen

**From:** [Amy Stewart](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE Harborton Reliability Project  
**Date:** Monday, December 30, 2024 6:32:48 PM

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Hello,

I'm writing to express my opposition to PGE's plan to clear nearly 5 acres of Forest Park. As I understand it, their report identified alternatives, and there might be other options not considered in the report.

We're living with the consequences of climate change right now. Cutting down more trees to make way for more power consumption can't possibly be the right answer.

Many thanks,  
Amy Stewart

**From:** [Nic W](#)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE's proposal to develop 4.7 acres of Forest Park  
**Date:** Wednesday, January 1, 2025 10:41:32 AM

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Dear Morgan Steele,

When I first moved to Portland, the first thing that struck me was how intertwined the city and nature are. I could be downtown, surrounded by skyscrapers, and then take the max 15 minutes and be in old-growth forest. Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.

Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.

Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations. There are other alternatives available that would meet our energy needs while protecting Forest Park. Please direct PGE to pursue those. Cheers,

Nic Westendorf

**From:** [Courtney Giordano](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Protect Forest Park  
**Date:** Wednesday, January 1, 2025 7:01:16 PM

---

Dear Morgan Steele,

As a 25 year resident of Portland, I was disappointed to learn of PGE's plan to develop within Forest Park. I oppose it for a few of the following reasons.

PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.

PGE's Alternatives Analysis shows there are possible locations outside Forest Park.

Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park.

PGE's mitigation plan is inadequate

The NRMP requires that mitigation take place in the same unit that is impacted. PGE's plan to fund habitat enhancements in other units of the park is inadequate

The ecosystem function lost through significant disruption of two streams and permanent filling of two wetlands is not adequately replaced with monoculture of oaks, which take 100+ years to reach maturity.

PGE's lack of transparency calls to question their genuine interest in community resiliency (a stated goal of the project)

PGE failed to release the Toth Report, which showed that viable alternatives existed, until Oct 2024.

PGE has not been transparent about their plans for future expansion

PGE did not meaningfully amend their proposal to reflect community feedback

This is an extension of my overall disappointment in PGE overall as my rates skyrocket and my neighborhood had been turned upside down by the line burial project. Loud crews of foul-mouthed workers have left trash and debris (cones, broken concrete, plywood) everywhere and work hasn't even begun on my side of the street. It seems it will never be completed across the street. It speaks to PGE's larger inefficiencies and lack of regard for their customer base and environment at large.

Sincerely,  
Courtney Giordano



**From:** [Debra Slater](#)  
**To:** [Steele, Morgan](#)  
**Subject:** City of Portland Must Reject PGE's Proposal to Develop 4.7 Acres of Forest Park  
**Date:** Wednesday, January 1, 2025 7:23:15 PM

---

Dear Morgan Steele,

I have lived in Portland for over 30 years, and a huge reason I've chosen this city to buy a home, work, raise my family, and retire someday is because of how intertwined the city and nature are. I could be downtown, surrounded by skyscrapers, and then drive 5 minutes and be in old-growth forest. Forest Park is an incredibly special place, for so many reasons. It provides a sanctuary for wildlife. Its trees clean our air, filter our water, and cool our city. And it is also a place where I can breathe deeply and remember that I'm a part of the natural world, too. Having a place like Forest Park so close to our city is a rare privilege, and we need to recognize how valuable of a resource it is, both ecologically and spiritually. I am so committed to working to keep Portland wild and native that I am a participant in the Backyard Habitat Program, achieving Platinum certification.

PGE's proposal to develop inside Forest Park is concerning for so many reasons. It blatantly fails to meet most of the criteria for development laid out by the Forest Park Natural Resources Management Plan.

- First and foremost, the proposal directly contradicts the top priority of the Forest Park Natural Resources Management Plan, which is to support the forest in becoming an old-growth forest. Cutting down mature trees and replacing them with saplings certainly does not align with this goal.
- Second, PGE's own analysis has shown that there are several alternative locations outside Forest Park to locate the project. It is possible to update their power grid without impacting Forest Park at all.
- Third, approving this project could set the precedent for future development in Forest Park that would further contradict the management plan. PGE has already stated that this is a multiphase project, with more phases of development to come. Laying down power lines in Forest Park opens the door to more expansion, and with that— more cut trees, stream degradation, and habitat loss.

Forest Park is a precious resource, and we need to treat it as such. PGE's proposal does not align with Forest Park's management plan, and would result in significant ecological and cultural loss. I'm asking that you reject PGE's proposal for the sake of the trees, the wildlife, the people, the city, and our future generations.

Sincerely,

Debra Slater

11237 SW 47<sup>th</sup> Ave.

Portland, OR 97219

503-245-1941

**From:** [Ann Littlewood](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Harborton Reliability Project  
**Date:** Wednesday, January 1, 2025 9:43:01 PM

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Dear Morgan Steele,

Please reject the Harborton Reliability Project. Portlanders fought for decades to establish Forest Park and value every square inch of it. The Forest Park Natural Resources Management Plan (NRMP) is a legal document. Trampling on this history and this plan is unnecessary and unwise. PGE has other options that cause less damage, as their own alternatives analysis shows. Moreover, approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park.

We need grid reliability but this is not the way to get there. Please reject it.

Thanks for your consideration.

Ann Littlewood  
Portland, OR

**From:** [Cheryl McDowell](#)  
**To:** [Steele, Morgan](#)  
**Subject:** Please oppose PGE's Harborton Reliability Project  
**Date:** Thursday, January 2, 2025 8:46:25 AM

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The 2 main goals of the NRMP are to 1) grow an ancient forest and 2) protect/enhance the forest for education/recreational opportunities. PGE's proposal directly contradicts both of these goals.

I oppose PGE's current PGE's Harborton Reliability Project and ask City Council to also oppose this destructive plan for the following reasons:

- PGE's proposal directly contradicts the top priority in the Forest Park Natural Resources Management Plan, which is to manage the forest towards old growth.
- PGE's own Alternatives Analysis shows there are possible locations outside Forest Park.
- Approval of this project could set a precedent for future phases of PGE's project and other development in Forest Park
- PGE's mitigation plan is inadequate
- The NRMP requires that mitigation take place in the same unit that is impacted. PGE's plan to fund habitat enhancements in other units of the park is inadequate
- The ecosystem function lost through significant disruption of two streams and permanent filling of two wetlands is not adequately replaced with monoculture of oaks, which take 100+ years to reach maturity.
- PGE's lack of transparency calls into question their genuine interest in community resiliency (a stated goal of the project)
- PGE failed to release the Toth Report, which showed that viable alternatives existed, until Oct 2024, which is far too late.
- PGE has not been transparent about their plans for future expansion.
- PGE did not meaningfully amend their proposal to reflect community feedback.

Please join me in supporting our magnificent Forest Park and opposing PGE's Harborton Reliability Project.

Sincerely,  
Cheryl J McDowell  
575 SW Sheridan St, Apt 853  
Portland, OR 97201

**From:** [jules.filipski@yahoo.com](mailto:jules.filipski@yahoo.com)  
**To:** [Steele, Morgan](#)  
**Subject:** PGE's Harborton Reliability Project - comments  
**Date:** Thursday, January 2, 2025 2:03:01 PM

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Hello,

I am writing to express my comments on PGE's proposal to clearcut 4.7 acres of forest in the northernmost section of Forest Park to improve power lines. This proposal is in blatant and direct opposition to the Forest Park Natural Resources Management Plan (NRMP), which has as its two main goals the **protection of this forest** both for educational/recreational opportunities and to manage the forest as it evolves into a mature forest. This latter goal, I must point out, is for the benefit of the human population as well, in that mature forests have been shown to be more resistant to fire. A mature forest throughout all of Forest Park will also help prevent landslides and mitigate other natural disasters, along with climate change. These very important goals need to be kept as priorities. They are goals with long-range vision, unlike the short-term solutions like this PGE development proposal. What will become of Forest Park? How do we envision Forest Park 50 years from now? There will be more proposals from PGE in the future, and approval of this project could set a precedent, creating a greater possibility for acceptance of other proposals, such as future phases of this project and other development in Forest Park.

Second, PGE's Alternatives Analysis shows there are possible locations outside Forest Park. Please pursue this avenue, even if it is more costly or involves impacting wealthy people living on Skyline Drive or elsewhere in the vicinity. Even if it affects me and my family's PGE bill. I say this even though I am a low-income person. I must also point out that PGE didn't to release the Toth Report, which showed that viable alternatives existed, until October, 2024. And they did not meaningfully amend their proposal to reflect community feedback. They will only put more effort into alternatives if they are forced to do so.

Third, the northern portion of Forest Park is the wildest, least frequented by humans. There are streams, a plethora native amphibians and other animals, and a forest with a fair amount of floral diversity. And Forest Park as a whole is such a valuable, beautiful aspect to living in Portland. It certainly played a role in attracting me to come live here.

Thank you for your consideration.

Sincerely,  
Julie Mackin



# City of Portland, Oregon - Bureau of Development Services

1900 SW Fourth Avenue • Portland, Oregon 97201 | 503-823-7300 | [www.portland.gov/bds](http://www.portland.gov/bds)



## Land Use Review Application

File Number: \_\_\_\_\_

### FOR INTAKE, STAFF USE ONLY

Date Rec \_\_\_\_\_ by \_\_\_\_\_

☐ Type I ☐ Type Ix ☐ Type II ☐ Type Iix ☐ Type III ☐ Type IV ☐ ELD

LU Reviews \_\_\_\_\_

[Y] [N] Unincorporated MC

[Y] [N] Potential Landslide Hazard Area (LD & PD only)

[Y] [N] Combined Flood Hazard Area

[Y] [N] DOGAMI

Qtr Sec Map(s) \_\_\_\_\_ Zoning \_\_\_\_\_

Plan District \_\_\_\_\_

Historic and/or Design District \_\_\_\_\_

Neighborhood \_\_\_\_\_

District Coalition \_\_\_\_\_

Business Assoc \_\_\_\_\_

Related File # \_\_\_\_\_

**APPLICANT: Complete all sections below that apply to the proposal. Please print legibly.**  
Email this application and supporting documents to: [LandUseIntake@portlandoregon.gov](mailto:LandUseIntake@portlandoregon.gov)

Development Site

Address or Location \_\_\_\_\_

Cross Street \_\_\_\_\_ Sq. ft./Acreage \_\_\_\_\_

Site tax account number(s)

R \_\_\_\_\_ R \_\_\_\_\_ R \_\_\_\_\_

R \_\_\_\_\_ R \_\_\_\_\_ R \_\_\_\_\_

Describe project (attach additional page if necessary)

Describe proposed stormwater disposal methods

Identify requested land use reviews

- **Design & Historic Reviews** - For **new development**, provide project valuation.

For **renovation**, provide exterior alteration value.

**AND** provide total project valuation.

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

- **Land Divisions** - Identify number of lots (include lots for existing development).

New street (public or private)?

☐ yes ☐ no

- **Affordable Housing** - For buildings containing five or more dwelling units, will 50% or more of the units be affordable to households with incomes equal to or less than 60% of the median family income for the county or state, whichever is greater?

☐ yes ☐ no ☐ N/A

**continued / over**

## Applicant Information

- Identify the primary contact person, applicant, property owner and contract purchaser. Include any person that has an interest in your property or anyone you want to be notified. Information provided, including telephone numbers and e-mail addresses, will be included in public notices.
- For all reviews, the applicant must sign the Responsibility Statement.
- For land divisions, all property owners must sign the application.

### PRIMARY CONTACT:

Typed Full Name \_\_\_\_\_ I acknowledge this typed name as my signature

Company/Organization \_\_\_\_\_

Mailing Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Day Phone \_\_\_\_\_ FAX \_\_\_\_\_ email \_\_\_\_\_

**Check all that apply** ☐ Applicant ☐ Owner ☐ Other

Typed Full Name \_\_\_\_\_ I acknowledge this typed name as my signature

Company/Organization \_\_\_\_\_

Mailing Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Day Phone \_\_\_\_\_ FAX \_\_\_\_\_ email \_\_\_\_\_

**Check all that apply** ☐ Applicant ☐ Owner ☐ Other

Typed Full Name \_\_\_\_\_ I acknowledge this typed name as my signature

Company/Organization \_\_\_\_\_

Mailing Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Day Phone \_\_\_\_\_ FAX \_\_\_\_\_ email \_\_\_\_\_

**Check all that apply** ☐ Applicant ☐ Owner ☐ Other

Typed Full Name \_\_\_\_\_ I acknowledge this typed name as my signature

Company/Organization \_\_\_\_\_

Mailing Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Day Phone \_\_\_\_\_ FAX \_\_\_\_\_ email \_\_\_\_\_

**Check all that apply** ☐ Applicant ☐ Owner ☐ Other

**Responsibility Statement** As the applicant submitting this application for a land use review, I am responsible for the accuracy of the information submitted. The information being submitted includes a description of the site conditions. I am also responsible for gaining the permission of the owner(s) of the property listed above in order to apply for this review and for reviewing the responsibility statement with them. If the proposal is approved, the decision and any conditions of the approval must be recorded in the County Deed Records for the property. The City of Portland is not liable if any of these actions are taken without the consent of the owner(s) of the property. In order to process this review, City staff may visit the site, photograph the property, or otherwise document the site as part of the review. I understand that the completeness of this application is determined by the Director. By my signature, I indicate my understanding and agreement to the Responsibility Statement.

**Name of person submitting this application agrees to the above Responsibility Statement and acknowledges typed name as signature:**

\_\_\_\_\_  
Date: \_\_\_\_\_

Phone number: \_\_\_\_\_

Email this application and supporting documents to  
[LandUseIntake@portlandoregon.gov](mailto:LandUseIntake@portlandoregon.gov)

Submittal of locked or password protected documents will delay intake of your application. **2**

State ID	Tax Lot	R No.	Parcel (acres)	Zoning	Overlays	Districts	Owner
2N1W34CB	00800	R175903	5.40	OSp	Environmental Protection	Northwest Hills; Forest Park	City of Portland
2N1W34CB	00900	R175902	0.64	OSp	Environmental Protection	Northwest Hills; Forest Park	City of Portland
2NW134CB	01000	R175905	1.57	OSp	Environmental Protection	Northwest Hills; Forest Park	City of Portland
2NW134CB	01100	R175906	1.70	OSp	Environmental Protection	Northwest Hills; Forest Park	City of Portland
2N1W34	00101	R714233	24.00	IHgkq IHik OSnq	g,k,q - River General, Prime Industrial, River Water Quality i,k - River Industrial, Prime Industrial n,q - River Natural, River Water Quality	n/a	Portland General Electric
2N1W34	00500	R325471	1.80	OSp	Environmental Protection	Northwest Hills; Forest Park	United States of America (BPA)
2N1W34	00400	R325475	15.79	OSp	Environmental Protection	Northwest Hills; Forest Park	City of Portland
2N1W34	01900	R504044	9.74	OSp	Environmental Protection	Northwest Hills; Forest Park	City of Portland



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**  
**FROM CONCEPT TO CONSTRUCTION**

Carmen Rubio, Commissioner  
David Kuhnhausen, Interim Director  
Phone: (503) 823-7300  
TTY: 711  
[www.portland.gov/bds](http://www.portland.gov/bds)

June 5, 2024

Meredith Armstrong  
Portland General Electric  
121 SW Salmon Street  
Portland, OR 97204

Re: Land Use Review LU 24-041109 CU EN GW

Dear Meredith Armstrong:

The Bureau of Development Services received your application for an Environmental Review, Greenway Review, and Conditional Use Review located at Harborton Substation and Forest Park on May 10, 2024. Your case has been assigned to planners Morgan Steele and Christine Caruso. To continue to review your application, additional information is needed. Once you submit this information, your application will be considered complete, and we will proceed with a full review of your proposal. Up to this point, your application has been reviewed only to determine if all required information has been submitted. The application has not been fully reviewed to determine if it meets the relevant approval criteria, however some issues you may want to consider are identified in Section II below.

**I. Information Necessary to Complete Application**

The following information must be submitted before your proposal can be evaluated:

**ENVIRONMENTAL REVIEW & GREENWAY REVIEW**

**1. Site Plans**

**a. All Site Plans**

- i. Please include all official City of Portland zoning lines on all plans. It appears some designations may have been left off. For example, the Harborton Substation area has a Prime Industrial (k) overlay zone designation that is not noted on the plan set.
- ii. Per 33.440.210.B.3, within the River Water Quality overlay zone, the Greenway Setback is mapped as 50 feet around the delineated edge of any identified wetland. As such, the plans should denote the 50-foot buffer as the Greenway Setback.

**b. Existing Conditions Site Plan**

- i. The top of bank of Stream 1 and 2 should be noted on all plan sets. Delineating top of bank for different types of streams (e.g., ephemeral, perennial) can be found in Zoning Code Section 33.430.150.

**c. Proposed Development Site Plan**

- i. Square footage of wetland impacts both at Harborton Substation and Forest Park (Wetlands A and B) should be noted in a table and included on the plans.
- ii. Tree 994 (51-inch DBH Oregon white oak) and Tree 80 (34-inch DBH Oak) are proposed for removal for proposed access; however, it appears to be adjacent to an already disturbed/cleared area. Provide information on why these substantial trees are proposed for removal and what alternatives were



explored for access in this area that would allow these trees to remain. Further, it appears these trees are outside existing easements on City of Portland owned property.

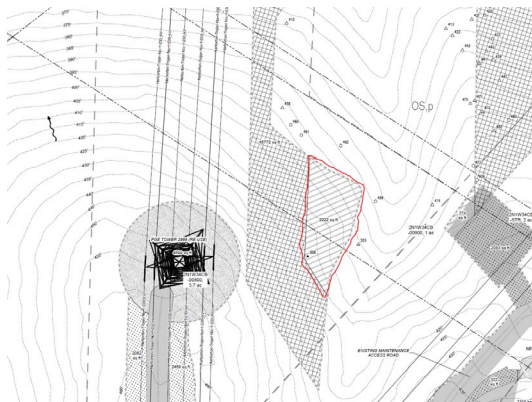
- iii. Tree 527 (98-inch DBH multi-stemmed big leaf maple) is proposed for removal; however, it is unclear for what reason. It appears the tree is both outside the proposed access road and the pad construction area for New Steel Pole 5. Provide detailed information on why this tree is proposed to be removed and what measures can be taken to allow this mature tree to remain.
- iv. Proposed tree removal should be included on the Proposed Development site plan to help demonstrate which portions of the work are necessitating the tree removal.
- v. Provide a cut sheet, detail, or profile plan for the towers with dimensions including height.

d. Construction Management Site Plan

- i. Sheets L207 and L209 appear to show work within Stream 1 denoted by the dark gray scale and identified as a "staging area." There also appears to be check dams proposed within the stream. Clarification must be provided on what impacts are occurring to this stream. If no impacts are proposed, appropriate BMPs (e.g., exclusion fencing) must be used to ensure the stream is well protected including an adequate buffer from top-of bank.
- ii. Clearly label areas of both cut and fill including contours lines and elevations. Currently, it is unclear whether proposed areas of grading are cut or fill.
- iii. The line for Tree Protection Fencing is not consistent throughout all plans (a portion of the line [inner short lines within bordered line] appears to be missing).
- iv. Provide additional information on and the purpose of the matted bonding fiber matrix proposed within the work areas. There appears to be matrix proposed over trees proposed to remain (Sheet L213). Provide information on the effect of the proposed construction management on trees.
- v. Trees outside the limits of disturbance appear to be proposed for removal (e.g., Tree 504, 615, 633). Clarify why these trees are being removed if they are located 1) outside limits of disturbance or 2) are already identified as dead and outside limits of work/access disturbance.
- vi. Sheet L213 shows trees to remain within the existing access road. Please clarify.

e. Mitigation Plan

- i. The proposed wetland seed mix hatching does not appear to match the legend or planting schedule. Please clarify.
- ii. Sheet L311 shows Tall Upland Plant Community within areas of proposed clearing due to concerns of windthrow. If tall trees can be planted in this area (circled in red), why are the trees being proposed for removal?



## 2. Narrative

- ❖ Environmental overlay zones protect environmental resources and functional values that have been identified by the City as providing benefits to the public. In this case, the resources are identified within the [Forest Park and Northwest District Natural Resources Inventory](#) (2022) as Resource Site FP2 – Upper Harborton. This inventory was adopted and implemented in October 2022 and as such the narrative must be updated to reflect this current resource document.
- ❖ To fully understand the demonstrated need for the proposal (Minor Amendment Criterion A), information must be provided detailing future possible expansion and/or upgrade of transmission lines as a result of this project. In other words, staff would like to know, if this upgrade is installed, what ability that provides for future expansion of and additional forest clearing for additional or altered transmission lines.
- ❖ A discrepancy exists between tree removal quantities stated in the narrative (328) and quantities provided in the tree table (308). Clarify this discrepancy including providing information on existing dead trees that are proposed for removal.

## 3. Other

- ❖ There appears to be an alternate access at Harborton Substation that avoids most wetland impacts. Staff requests information on resource impacts of this alternate route and why this route is or is not feasible.



## CONDITIONAL USE REVIEW

### 33.815.230 Rail Lines and Utility Corridors

- A.** *The proposed rail line or utility corridor is sufficiently separated from nearby land uses so as to allow for buffering of the uses, especially in residential areas. In the case of railroad lines, separation distances should consider the expected number, speed, size, types, and times of trains; and*
  - ❖ In your narrative, describe the surrounding land uses and what buffering is being provided between the surrounding land uses and the project area.
- B.** *The rail line or utility corridor will not substantially impact the existing or planned street system, or traffic, transit, pedestrian, and bicycle movement and safety.*
  - ❖ In your narrative, describe any impacts on existing trails that go through or near the project area, and describe any mitigation to reduce or eliminate any adverse visual, physical, or sonic impacts on trails.

Show any provided mitigation on the plans. Also see Portland Bureau of Transportation comments on the planned street system, traffic, transit, pedestrian, and bicycle movement and safety.

## II. Issues to Consider

While not necessary to determine the application complete, additional information may be needed to show that your proposal meets the applicable approval criteria. You are encouraged to address the following issues regarding the approvability of your proposal:

- **Staff has concerns about the approvability of the proposal to clear 4.7 acres of Forest Park for both the installation and re-routing of transmission lines; the scale of proposed impacts and the irreversible ecological effects to an existing high-value, high-functioning ecosystem do not appear to meet multiple approval criteria including:**

- Per Minor Amendment Criterion B, it must be demonstrated how the proposed action is consistent with the Forest Park Natural Resources Plan Goals and Strategies (found in Chapter 6 of the NRMP). Specifically, Conservation Goal #1 (pasted below) speaks to protecting Forest Park's native plant and animal communities, and its soil and its water resources while managing the ecosystem to grow an ancient forest. The proposal to remove 308 trees totaling approximately 5,400-inches diameter breast height is counter to all points listed in the NRMP Conservation Goal #1. Further, other components of the existing ecosystem that will be irrevocably impacted include but are not limited to disruption of soil and ephemeral groundcovers (e.g., trillium, enchanter's nightshade, Western starflower, etc.), alteration of the riparian dynamic adjacent to stream 1 (including removal of shade and disruption of stream substrate), removal of nurse logs and standing snags that provide benefits to both flora (e.g., mushrooms, lichen, moss) and fauna (pileated woodpecker, pygmy owl), and alter existing ecosystem functions (e.g., carbon sequestration, nutrient retention, etc.) that cannot be replicated.

*Grow an ancient forest*

**Conservation Goals**  
Parks and Recreation has two primary conservation goals:

1. Protect Forest Park's native plant and animal communities, and its soil and water resources while managing the forest ecosystem in order to grow a self-sustaining ancient forest for the enjoyment and benefit of future generations.

- Per Exception Criterion D, long-term adverse impacts of the proposed project must be fully mitigated within the same (north) management unit. The proposed mitigation does not adequately mitigate for the magnitude of impacts on the existing resources and their functional values for the following reasons:
  - The existing ecosystem within the project footprint consists of an undisturbed, mature mixed conifer and broadleaf deciduous forest including stream, wetland, and riparian resources. This multi-story tree canopy includes mature, established trees with a diversity of species in the understory. The main component of the proposed mitigation, planting an oak woodland regime, is problematic in the temporal loss that will occur between the time of impact to the time of compensatory mitigation. The length of time it will take for an oak woodland to establish (presumably a minimum of 80 years) and its propensity for invasive species establishing in its more open, disturbed soil understory does not fully mitigate for the long-term adverse impacts of proposed forest clearing and stream disruption in an existing high-functioning, undisturbed system.
  - As noted on Page 49 of Appendix D, Habitat Mitigation Plan, the current mitigation approach does not fully mitigate the loss of carbon sequestration provided by the current forest habitat. The proposal to plant 100 trees off-site at a designated heat island elsewhere in the City to compensate for the loss in carbon sequestration does not meet the approval criteria since 1) it will not be taking place in the North Management Unit, and 2) without any specifics about location, regime, and maintenance and/or monitoring procedures it is not possible to determine if the out-of-kind plantings will compensate for the loss in carbon sequestration as a result of the project clearing.

- While providing funding to the red-legged frog migration support may potentially mitigate for impacts to Stream 1 and Stream 2 and other wildlife habitat, staff would like to know what assurances PGE can provide that the proposed funding will bring this project to fruition to allow the mitigation to be complete and thus compensatory?
  - Impacts to Wetland A and Wetland B are proposed to be mitigated outside of Forest Park at Harborton Substation. Staff would like additional information as to why these wetlands cannot be restored or mitigated within the North Management Unit of Forest Park as required by the approval criteria.
- Per Zoning Code section 33.815.230 Criterion A and B, buffering between the project area and adjacent zones must be provided and impacts to the pedestrian and bicycle movement cannot be substantially impacted. The proposal to replant in areas outside of Forest Park does not buffer or mitigate impacts on the immediate area around the project.

### III. Time to Complete Application

The Portland Zoning Code allows you up to 180 days to complete your application. Since the 180-day period began on the day we received the application, the deadline to make your application complete is **Wednesday November 6, 2024**.

### IV. Determination of a Complete Application

The application will be determined complete when you have submitted:

1. All the requested information included in Section I, above. If you cannot provide all the requested information at one time and intend to submit additional information, please include a written statement with each separate submittal indicating that you still intend to provide the additional missing information by the **Wednesday November 6, 2024** deadline, **or**
2. Some of the requested information included in Section I, above, and a written statement that no additional information will be provided; **or**
3. A written statement that none of the requested information included in Section I, above, will be provided.

Please be aware that not submitting the requested information may result in your application being denied. The information is needed to demonstrate the approval criteria are met. Once the application is deemed complete, review of your application can proceed using the information you have provided.

Your application will be approved if it meets the relevant land use review approval criteria. It is your responsibility to document how the approval criteria are met. The items listed above will help provide that documentation.

### Voiding of Application

If your application is not complete by **Wednesday November 6, 2024**, it will be voided, and the application fee will not be refunded. The City's land use review procedures are outlined in Chapter 33.730 of the Portland Zoning Code.

Please contact us if you have any questions about this letter. Our telephone numbers are 503.865.6437 (Morgan) and 503.865.6420 (Chris), and our e-mail addresses are [Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov) and [Christine.Caruso@portlandoregon.gov](mailto:Christine.Caruso@portlandoregon.gov). Requested information noted above should be emailed to both of us. Please e-mail either of us for file dropbox instructions if document or drawing file sizes are greater than 5MB. Please label all correspondence and materials you submit with the case number LU 24-041109.

Sincerely,



Morgan Steele, Planner  
Land Use Services Division



Chris Caruso, Planner  
Land Use Services Division

cc: Noah Herlocker  
Randy Franks  
Laura Lehman  
Application Case File

Attachments:

Portland Bureau of Transportation Request for Completeness  
Bureau of Environmental Services Request for Completeness  
BDS Site Development Request for Completeness  
Portland Parks & Recreation Incompleteness Memo  
Application Comments from Matt Vesh, BES Wetland Scientist



PORTLAND BUREAU OF TRANSPORTATION

1900 SW Fourth Ave., Suite 5000 Portland, OR 97201 503-823-5185  
Fax 503-823-7576 TTY 503-823-6868 [www.portlandoregon.gov/transportation](http://www.portlandoregon.gov/transportation)

## RESPONSE TO THE BUREAU OF DEVELOPMENT SERVICES REQUEST FOR COMPLETENESS REVIEW

LU: 24-041109-000-00-LU Date: May 21, 2024  
To: Morgan Steele, Bureau of Development Services, B299/R5000  
From: Tammy Boren-King, B106/800, 503-823-2948, [tammy.boren-king@portlandoregon.gov](mailto:tammy.boren-king@portlandoregon.gov)  
Applicant: Portland General Electric \*Randy Franks\* & Portland General Electric \*Meredith Armstrong\*  
PORTLAND GENERAL ELECTRIC  
121 SW SALMON ST  
PORTLAND, OR 97204

Location:

TYPE OF REQUEST: Type 3 procedure CU - Conditional Use

### DESCRIPTION OF PROJECT

Portland General Electric (PGE) is requesting approval to construct a new 1,400-foot-long segment of transmission corridor and shift a portion of existing transmission corridor slightly south to make necessary wire routing improvements. All work in Forest Park is proposed within existing PGE utility easements. To install two new steel poles and shift one existing pole south, PGE must clear 4.78 acres of forest habitat in the park. This is forest that is currently surrounded by utility corridors on all sides. Work would also occur at PGE's Harborton Substation at 12500 NW Marina Way, including 3 new poles in the gravel parking area west of the substation and temporary access in the wetland south of the substation to reconfigure wiring on existing towers. The project is needed to address system vulnerabilities and provide the power supply and system redundancy needed to accommodate current and near-term power demands. Stormwater: The project proposes only negligible new impervious associated with two new pole foundations (~226 square feet total). This clean runoff would infiltrate in surrounding forest soils. During construction, stormwater will be managed per the Construction Stormwater Best Management Practices Manual for the 1200-C NPDES General Permit.

### RESPONSE

Portland Transportation/Development Review has reviewed the application for its potential impacts regarding the public right-of-way, traffic impacts and conformance with adopted policies, street designations, Title 33, Title 17, and for potential impacts upon transportation services.

#### Environmental Review Approval Criteria

There are no transportation related approval criteria for the environmental review component of the subject case.

#### Conditional Use Approval Criteria

The transportation related approval criteria related to the proposed Conditional Use that must be addressed are found in PZC Sections 33.815.230.B. The applicant provided a narrative sufficient for completeness review purposes.

**Public Improvements**

The project will not meet the thresholds in 17.88.020 or TRN 1.30 for when the Portland Bureau of Transportation (PBOT) requires public improvements. No dedication or street improvements are required.

The plans do not show any work happening a right-of-way controlled by PBOT.

The proposal includes work that will string new utility lines over the public rights-of-way for both NW Marina Way and NW St. Helens Rd., both of which are Oregon Department of Transportation (ODOT) facilities. All permitting for this activity is through ODOT. The applicant's narrative reflects that they are currently working with ODOT to permit this activity including the necessary highway lane closure.

**RECOMMENDATION**

PBOT has no objection to the application being deemed complete.





# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Ave, Suite 613, Portland, Oregon 97204 ■ Mingus Mapps, Commissioner ■ Dawn Uchiyama, Director

## Completeness Response

**Date:** May 21, 2024

**To:** Christine Caruso, BDS Land Use Services  
503-865-6420, Christine.Caruso@portlandoregon.gov

**From:** Ella Ruth, BES Systems Development  
503-823-8068, Ella.Ruth@portlandoregon.gov

**Case File:** LU 24-041109

**Proposal:** Portland General Electric (PGE) is requesting approval to construct a new 1,400-foot-long segment of transmission corridor and shift a portion of existing transmission corridor slightly south to make necessary wire routing improvements. All work in Forest Park is proposed within existing PGE utility easements. To install two new steel poles and shift one existing pole south, PGE must clear 4.78 acres of forest habitat in the park. This is forest that is currently surrounded by utility corridors on all sides. Work would also occur at PGE's Harborton Substation at 12500 NW Marina Way, including 3 new poles in the gravel parking area west of the substation and temporary access in the wetland south of the substation to reconfigure wiring on existing towers. The project is needed to address system vulnerabilities and provide the power supply and system redundancy needed to accommodate current and near-term power demands. Stormwater: The project proposes only negligible new impervious associated with two new pole foundations (~226 square feet total). This clean runoff would infiltrate in surrounding forest soils. During construction, stormwater will be managed per the Construction Stormwater Best Management Practices Manual for the 1200-C NPDES General Permit.

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BES provides the following comments in response to materials received for the purpose of determining completeness of the above-referenced Land Use application. Items requested in this memo should not be considered final, as staff reserves the right to request additional materials during the formal review period.

1. **Drainageway Protection:** City records indicate there is a drainageway on the subject site located on 12500 NW Marina Way (R714233).
  - a. **Drainageway:** A drainageway is defined as a constructed or natural channel or depression that may at any time collect and convey water; it may be permanently or temporarily inundated. Depending on the capacity of the drainageway and size of the proposed development, the identified drainageway may serve as a disposal location for stormwater runoff from the project.
  - b. **Drainage Reserve:** Drainageways are protected by means of a drainage reserve except when the drainageway is adequately protected by an Environmental Protection overlay zone, another overlay zone that provides equivalent or better protection as determined by BES, or a tract (such as an Environmental Resource Tract) that equally or better meets the purpose of the drainage reserve, as determined by BES. Drainage reserves act as no-build areas and are intended to protect flow conveyance and water quality in both natural and constructed surface channels. Drainage reserves are typically delineated 15 feet from the centerline of the channel on both sides; however, a drainage reserve may be wider than 30 feet if needed to adequately protect the channel and bank. The applicant should refer to Chapter 5 of the SWMM for drainage reserve information and/or contact BES staff (identified above) for assistance.
  - c. **Documentation:** It appears the drainageway and associated drainage reserve are located within 50 ft of the proposed temporary or permanent disturbance area. Therefore they must be shown on existing and proposed conditions site plans submitted with future land use review application. If encroachments are proposed into the drainage reserve, BES may require a topographic survey of the drainageway. To help ensure long-term



protection of drainage reserve areas, a notice about the drainage reserve must be recorded against the property deed through the applicable County recorder's office via a Notice of Drainage Reserve Form or an Operations and Maintenance (O&M) Plan and Form. The type of form required will depend on the impact to the drainage reserve; see Section 5.10 of the SWMM for more information.

2. ***Drainageway Encroachment:*** Encroachments into a drainage reserve must be reviewed by BES through the encroachment review process unless allowed outright per Section 5.5.1 of the SWMM. Proposed impacts and encroachment proposals will be reviewed to ensure that the flow rate, timing, and pattern of the drainage continues to be adequately conveyed through the site and to protect water quality. There are two types of encroachments:
  - a. **Drainage Reserve Buffer Encroachment:** An encroachment located within the outer 5 feet of a drainage reserve.
  - b. **Drainage Reserve Channel Encroachment:** An encroachment located within 10 feet of the channel centerline. For drainage reserves with a total width other than 30 feet, the channel encroachment area will be determined on a case-by-case basis through the encroachment review process.

Based on the submitted plans, it appears that the proposed development will encroach into the drainage reserve. However, BES has not received the necessary drainage reserve submittal information to review the proposed encroachment. Refer to Section 5.5 for information related to encroachments, Section 5.6 for mitigation requirements, and Section 5.9 for drainage reserve submittal requirements. The applicant may also contact BES staff to discuss specific submittal items necessary for the proposed encroachment. Once this information has been provided, BES will determine if the proposed encroachment can be approved.



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**  
FROM CONCEPT TO CONSTRUCTION

Carmen Rubio, Commissioner  
David Kuhnhausen, Interim Director  
Phone: (503) 823-7300  
TTY: 711  
[www.portland.gov/bds](http://www.portland.gov/bds)

---

## Review For Completeness Response

To: Christine Caruso, 503-865-6420, LUR Division  
From: Kevin Wells, Site Development 503-823-5618

Location/Legal: BLOCK 11 E OF COMPROMISE LINE LOT 1-3, HARBORTON; BLOCK 11 W OF COMPROMISE LINE LOT 1-3 LOT 4-7, HARBORTON; BLOCK 11 LOT 11, HARBORTON; BLOCK 11 LOT 12, HARBORTON; TL 500 1.80 ACRES, SECTION 34 2N 1W; TL 300 62.97 ACRES DEPT OF REVENUE, SECTION 34 2N 1W; TL 400 15.79 ACRES, SECTION 34 2N 1W; TL 1900 9.74 ACRES, SECTION 34 2N 1W

Land Use Review: LU 24-041109  
Proposal: Portland General Electric (PGE) is requesting approval to construct a new 1,400-foot-long segment of transmission corridor and shift a portion of existing transmission corridor slightly south to make necessary wire routing improvements. All work in Forest Park is proposed within existing PGE utility easements. To install two new steel poles and shift one existing pole south, PGE must clear 4.78 acres of forest habitat in the park. This is forest that is currently surrounded by utility corridors on all sides. Work would also occur at PGE's Harborton Substation at 12500 NW Marina Way, including 3 new poles in the gravel parking area west of the substation and temporary access in the wetland south of the substation to reconfigure wiring on existing towers. The project is needed to address system vulnerabilities and provide the power supply and system redundancy needed to accommodate current and near-term power demands. Stormwater: The project proposes only negligible new impervious associated with two new pole foundations (~226 square feet total). This clean runoff would infiltrate in surrounding forest soils. During construction, stormwater will be managed per the Construction Stormwater Best Management Practices Manual for the 1200-C NPDES General Permit.

Quarter Sec. Map: 1717, 1718, 1816, 1817, 1818  
Date: May 21, 2024

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The Bureau of Development Services (BDS) Site Development section provides the following comments based on the land use application and documents provided by the Applicant. References to Portland City Code (PCC) may be included below. City codes are available for on-line review from the City Auditor's [Online Charter and Code page](#).

### Response Summary

Site Development determines that the material submitted for review are insufficient.

**The applicant must submit a geotechnical report and/or slope hazards report to assess the potential for slope instability both during and after construction.** This information is required to facilitate review of the construction management plan, limits of disturbance, and impacts to adjoining property. A geotechnical report and/or slope hazards evaluation is also

required to determine if engineered mitigation is required to reduce slope hazards until mitigation plantings are well established (buttresses, debris flow diversion structures, specialized construction staging, etc.). Site Development's key concern is the potential for slope instability, debris flows within existing drainages, and debris flow outbursts along Highway 30 (or other adjoining property) resulting from the proposed tree removal.

## **Key Comments from Early Assistance (EA) Meeting 22-142455-EA**

### *Slope Hazards*

The project is characterized by steeply sloping terrain that is susceptible to landslide activity. In addition, the project area encroaches over an existing pre-historic landslide. Site Development is concerned that the proposed clearing, grading, and tree removal will alter slope and groundwater conditions potentially impacting the stability of the existing slopes. Key hazards of concern include surficial slope instability, general slope instability, and debris flow failure (i.e. debris flows resulting from slope failures that are propelled into narrow drainages depositing onto Highway 30).

### *Geotechnical and Slope Hazards Report*

The applicant must provide a geotechnical report and slope hazards report with any building permit or land use application. The geotechnical report must be prepared by an Oregon-registered professional engineer with experience in geotechnical engineering. The geotechnical report must summarize the subsurface conditions, including groundwater, and provide the engineer's quantitative evaluation of existing and proposed slope stability conditions for both static and seismic cases. The engineer must also provide recommendations for clearing, grading, and slope hazard mitigation where the proposed work results in an unsuitable factor of safety against sliding.

Geologic hazards (slope hazards) should be evaluated by a geotechnical engineer and certified engineering geologist (CEG) to assess geomorphology, historic and pre-historic landslide activity, and groundwater factors that may aggravate slope instability. Guidelines for conducting slope hazard evaluations are presented on the City's website, which can be accessed [here](#). At a minimum, slope hazard investigations and reports must include:

1. A site reconnaissance conducted by a Certified Engineering Geologist where deep-seated pre-historic and historic landslides are required to be evaluated.
2. Subsurface investigations which extend below possible failure surfaces anticipated to have a factor of safety of less than 1.5 under static loading or 1.0 under seismic loading.
3. Investigation to determine the location of groundwater within the area of interest.
4. Strength testing of the soils of interest; either in-situ testing, laboratory testing, or both. Strength correlations for in-situ testing shall be well documented.
5. Geologic cross sections for the critical slope sections analyzed, including assumed piezometric surfaces.
6. Detailed descriptions of the analysis methods used and assumptions made in the numerical modeling.
7. Recommendations for temporary and permanent surface and subsurface drainage elements.
8. Discussion of the effects of on-site effluent disposal and stormwater disposal systems, existing or proposed, on slope stability.
9. Detailed laboratory testing results attached within a report appendix.

10. Detailed subsurface investigation results attached within a report appendix.
11. Geotechnical recommendations for site development, grading, and construction.
12. Recommendations for site development and mitigation measures required to achieve the minimum allowable factors of safety against slope instability.
13. Recommendations for temporary and permanent erosion control.
14. A statement of understanding of the performance criteria and expected displacements under seismic loading conditions.
15. A statement that the construction plans have been reviewed by the project Geotechnical Engineer or project Certified Engineering Geologist for conformance with the recommendations of the slope hazard evaluation and geotechnical engineering report. The date listed on the reviewed plans should be stated.

Note: In addition to the above criteria, the geotechnical engineer and engineering geologist must evaluate the impact of the proposed clearing, grading, and tree/shrub removal on slope stability.



MEMORANDUM

DATE: June 5, 2024

TO: Morgan Steele, Senior Environmental Planner

FROM: Rachel Felice, City Nature Manager  
Marshall Johnson, Forest Park Natural Resource Ecologist  
Laura Lehman, Senior Environmental Planner

SUBJECT: LU 24-041109 CU EN GW Portland General Electric  
Harborton Reliability Project incompleteness review

Portland Parks & Recreation (PP&R) staff have reviewed the materials submitted for LU 24-041109 CU EN GW and would like to provide the following comments on the completeness of the application. Thank you for the opportunity to comment.

1. Consistency with approval criteria: Chapter 8 of the 1995 [Forest Park Natural Resources Management Plan](#) include the approval criteria for development in the park. Criterion B for Minor Amendments requires that the proposal be consistent with the Forest Park Natural Resources Management Plan Goals and Strategies. Conservation Goal 1 (page 98 of the plan) is to *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*. The application proposes to deforest 4.7 acres of Forest Park, including removing more than 350 trees

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Commissioner Dan Ryan  
Director Adena Long



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(including topped trees) and filling two wetlands. This would be a significant and permanent impact to the plant and animal communities and water resources in the park. The information provided in the application does not demonstrate how this proposal is consistent with Conservation Goal 1 and does not show how the proposal protects the native plant and animal communities or soil and water resources – therefore the submitted proposal does not meet this approval criterion.

2. Future phases: The submitted application indicates that the current proposal is Phase 3 of a 5-phase project. Information about the scope of Phases 4 and 5 is not provided. To give a full description of the impacts of the proposed project, the applicant must provide information about Phases 4 and 5, including their location and scope. PP&R understands that these phases may not yet be fully developed, preliminary information should be provided if complete information is not available.

#### Mitigation plan

3. Temporary disturbance areas: Invasive plant management and reseedling within the disturbance areas of the project site should be considered part of site restoration and should not be counted towards mitigation requirements. Table 4 should be revised to reflect the difference between restoration of temporary disturbance area within the project limits, and mitigation area. Please document native vegetation cover in any areas where disturbance is proposed, including cover type, plant species and potential wildlife habitat in those areas so that proposed impacts can be accurately evaluated.
4. Revegetation with focus on oak woodland: Mitigation that expands Oregon white oak (*Quercus garryana*) woodland should consider long-term maintenance of this habitat type, which is costly due to its propensity for re-invasion by aggressive weeds like blackberry

and scotch broom. Converting portions of the existing mature forest to oak woodland does not mitigate directly for the resources that would be lost and may not adequately mitigate for the loss of the existing forest type due to the length of time required for oak woodland to become established. Oak woodland habitat is high value and PP&R recommends the applicant focus on preserving the existing oak woodland habitat and mitigating for impacts to mature forest with in-kind restoration.

5. Aquatic resource enhancement: The proposed wetland mitigation is off-site – PP&R recommends that PGE explore options for on-site mitigation for wetland impacts that would mitigate for resource loss within the park.
6. Red-legged frog migration support: PP&R supports red-legged frog habitat mitigation as part of this project. Red-legged frog habitat mitigation should be in addition to mitigation for tree impacts and loss of forest habitat. Based on information PP&R has received, the Harborton wildlife underpass project concept faces feasibility challenges and high estimated costs, resulting in limited potential for mitigation of this proposal. The Newton Wetland amphibian habitat project may be an alternate option for mitigation; this project is still in development and PP&R would be happy to provide more information about the project and its status on the status of the Newton Wetland option.
7. Off-site tree planting: The proposed off-site tree planting supports City policies but does not directly address habitat impacts in Forest Park. PGE should consider mitigation that would directly address habitat loss in the park.
8. Potential mitigation: Below is a list of other potential mitigation options the applicant may wish to consider, that could be combined into a mitigation package:

- Providing funding or partial funding to support development of an amphibian habitat restoration project at Newton Wetlands in the North unit of Forest Park.
- Reforestation by the applicant in existing cleared areas of the park to replace a portion of the forest lost. There may be approximately one acre available in the North Unit of Forest Park, including an existing clearing along Newton Trail and a clearing at Keilhorn meadow near Skyline Blvd.
- Mitigating for impacts to aquatic and amphibian habitat through restoration activities on streams in North Forest Park, such as Newton Creek and the unnamed creek south of the project site.
- Purchasing additional forest that is not currently protected from future development and adding it to Forest Park. For example, undeveloped residential land near the Harborton Neighborhood where there are currently red-legged frog habitat and migration pathways.
- Payment into the Forest Park trust fund for a portion of the mitigation requirement. The North Forest Park area in need of restoration work is not large enough to mitigate for the entire proposed impact, but a partial payment as part of a mitigation package may be an option.

### Tree impacts

9. Tree survey and tables: There are discrepancies in the trees shown for removal and preservation on the tree survey, tree tables, plan sheets, and trees on site. The tree survey maps in the arborist report are also incomplete. Please provide complete tree survey tables and provide consistent tree information throughout the plan set, and ensure this information is consistent with the trees on site. Please show the trees to be removed on the proposed development plan – in the submitted plan set it appears they are shown on the Construction Management Plan but not on the Proposed Development Plan. Examples of inconsistencies between



the submitted survey and the trees on site can be provided by PP&R upon request.

10. Total trees removed: There are 22 trees proposed to be topped. Topped trees are considered removed under Title 11 and should be reflected throughout the submittal as trees to be removed, including Tree Mitigation Table 6 (page 31 of Appendix D). Please ensure that the number of trees to be removed is consistent throughout the application.
11. Tree measurement: Based on on-site measurements of some of the trees in the tree table, it appears that some multi-stemmed trees were not measured using the methodology set out in Title 11, Trees. Some multi-stemmed trees appear to be listed in the tree table based on the diameter of a single trunk or other method. Please verify the method used to measure multi-stemmed trees and ensure it is consistent with the measurements section of [Title 11](#), and update the tree table as needed to reflect the correct measurements. PP&R will provide a list of the multi-stemmed trees that were checked upon request.
12. Future pruning and topping: Note 5 of the application narrative (page 30) states “Habitat losses can also be mitigated by pruning or topping of trees in the future, rather than cutting down trees, or trees can be topped and ringed to become snags, an especially valuable wildlife habitat component.” Topping or pruning trees in the future as part of the ongoing maintenance of PGE lines should be mitigated as impacts separately at the time that those impacts occur. Avoidance of these impacts during the proposed project should not be included as mitigation for clearing forest land as part of this project.

### Other comments

13. Alternatives analysis: Thank you for providing information about the alternatives analysis for the overall project. The information provided refers to a full alternatives report prepared by Toth and Associates in 2022. Please provide a copy of this report.
14. Alternatives analysis: The alternatives analysis provides an overview of the project as a whole and the analyses that went into selecting the proposed option. Please also address project elements in the alternatives analysis, such as shifting the location of the existing tower, grading landings for the new towers, vegetation impacts underneath the proposed lines, specific tree removal criteria for trees not directly underneath the powerlines, and tree removal methods.
15. Resource site: Please update the resource site description in the application. The resource site from the 1991 NW Hills Natural Areas Protection Plan was updated by the Environmental Overlay Zone Map Correction Project in 2022. Please refer to Resource Site FP2 of Upper Harborton in Volume 2 Part A1 - Forest Park and Northwest District, Natural Resource Inventory and Protection Decisions (Resource Sites 1-20) Adopted by City Council May 25, 2022. ([Efiles - Ezones Project Volume 2A1](#)).
16. Wildfire prevention: Any construction activity or work on site will be required to comply with PP&R's wildfire season activity restrictions – if these restrictions cannot be met, the applicant will be required to submit a project-specific wildfire risk reduction plan for review and approval by PP&R.



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Ave, Suite 613, Portland, Oregon 97204 ■ Mingus Mapps, Commissioner ■ Dawn Uchiyama, Interim Director

## M E M O R A N D U M

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**June 5, 2024**

**TO:** Morgan Steele, BDS Planner; Laura Lehman, PP&R Planner

**CC:** Dominic Maze, BES Biological Science Team Interim Manager; Jade U. Ashcroft, BES Wildlife Biologist; Marshall Johnson, PP&R Forest Park Ecologist

**FROM:** Matt Vesh, BES Wetland Scientist

**RE:** PGE Harborton Reliability Project Land Use Review Application Comments

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### **Purpose**

The purpose of this memo is to provide initial comments from the BES Wetland Scientist regarding the Land Use Review Application for PGE's Harborton Reliability Project. Follow up is needed and expected.

### **Wetlands and Waters**

- The boundaries of known wetlands and other waters are not depicted accurately on Exhibit D Existing Conditions Plan and other plan maps. City code indicates wetlands and waters within 50 feet of the site should be delineated and shown on maps.
  - Southeast of the Harborton Substation, there are unmapped wetlands and waters located outside of the WD2021-0065 study area (north and south) that are within 50 feet of the site. Please delineate and show these wetlands and waters on the plan maps. See attached BES Wetland Inventory Project (WIP) mapping and prior delineation concurrences mapping indicating wetlands in this area.
  - WD2023-0584 identified two DSL jurisdictional wetlands WA and WB and one jurisdictional intermittent stream S1 and one non-jurisdictional ephemeral stream S2. The BES Wetland Scientist would like to review the DSL approved wetland and waters delineation report concurred as WD2023-0584 to confirm that Stream S2 was correctly determined to be ephemeral using the EPA's Streamflow Duration Assessment Methods

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LU 24-041109 CU EN GW | Exhibit G.2

(SDAM) for the Pacific Northwest and that downslope portions of the drainage lacking bed and bank and forming a vegetated swale were assessed for wetland conditions using a wetland determination data form.

- The Forest Park Ecologist indicated there may be an unmapped wetland between S2 and S1. The applicant should consult with the PP&R Ecologist and investigate that particular soggy area for wetlands.
- Stream S2 and the swale portion downslope may qualify as a BES Drainageway regardless of their DSL or Corps jurisdictional status.
- The project proposes removal-fill activities and other impacts to delineated wetlands and waters but does not identify how those impacts will be mitigated.
  - Adding large woody debris to wetlands and waters is considered fill.
  - WD2023-0584 Wetlands WA and WB and WD2021-0065 Wetland F appear to have temporary and permit impacts.
  - Page 42 of the Land Use Application Narrative indicates wetland area and functions of WA and WB will be replaced by creating an enhancement wetland adjacent to the Willamette at PGE's Harborton Property, but there are no plan maps or further discussion.

#### **Oak Habitat**

- The oak management and mitigation plans are not cohesive as indicated by the items listed below.
  - Four large, mature *Quercus garryana* are proposed to be removed (trees #1, #994, #80, #72). The age of the largest oak (#1) at 54" DBH is estimated to be 162 to 500 years old, and it was likely an acorn producing tree prior to European American settlement of Portland. The other three oaks to be removed are 51" (#994), 34" (#80), and 22" (#72) DBH. There is little to know explanation in the permit application for the removal of the old growth oaks or how alternatives to their removal were assessed, and proposed mitigation for the loss of these trees is lumped in with loss of the mature *Pseudotsuga menziesii* – *Acer macrophyllum* habitat. Avoidance, minimization, and mitigation options should be discussed for these exiting mature oaks. These trees are rare and irreplaceable within multiple human lifetimes.
  - Appendix B Arborist Report/Tree Protection Plan maps misrepresent the location of mature Oregon white oaks. For example, the maps show tree #994 being retained (blue dot) and located near Skyline Blvd on page 11 while the chart on page 39 says it is not being retained and Exhibit E Existing Conditions map shows it is located on the opposite side of the project area adjacent to the NW BPA Road off Highway 30.
  - Exhibit G Mitigation Site Plan specifies Oregon white oak as 1 of 7 tree species to be planted in the Medium Upland Plant Community. Oak Woodlands is an Oregon Conservation Strategy Habitat defined as 30-70% canopy cover of *Quercus garyanna*. The ratio of oak to other much

faster growing trees in the planting plan is 3 to 3.9. At what point is it estimated that the planting areas will meet OCSH Oak Woodland criteria? These cover thresholds should be accounted for in the mitigation performance standards and assessed via routine vegetation monitoring guidelines. Revegetation of the site should not be deemed a success and released from monitoring and management obligations until OCSH Oak Wood criteria is met.

- Exhibit G Mitigation Site Plan specifies plants species that are not native to Portland, Oregon or the Metro area such as *Pinus contorta var. contorta* to be planted in the oak woodland creation area.

### **General Comments**

- Mitigation is meant to replace or compensate for ecological functions and societal values that will be permanently lost. Mitigation depends on appropriate siting, implementation, the site's ability to be self-sustaining, and long-term protection. Restoration typically means the reestablishment of prior existing habitat. Enhancement typically means to improve the condition and increase the functions and values of degraded habitats, and Preservation typically relies on preventing the decline of, and threat to, exceptional ecological features. Preservation may be an appropriate mitigation option to protect a resource type that is exceptionally difficult to replace such as oak woodland or late successional mixed conifer forest.
- Trading existing non-degraded, self-sustaining Oregon Conservation Strategy Habitats Late Successional Mixed Conifer Forest and Flowing Water and Riparian Habitats for creation of novel oak habitat that will require long term management and may not meet the definition of Oregon Conservation Strategy Habitat Oak Woodland because of the management restrictions of the powerline corridor does not appear to meet the general concept of restoration, enhancement, or preservation as noted above. Offsite mitigation that includes restoration, enhancement, or preservation will be required.



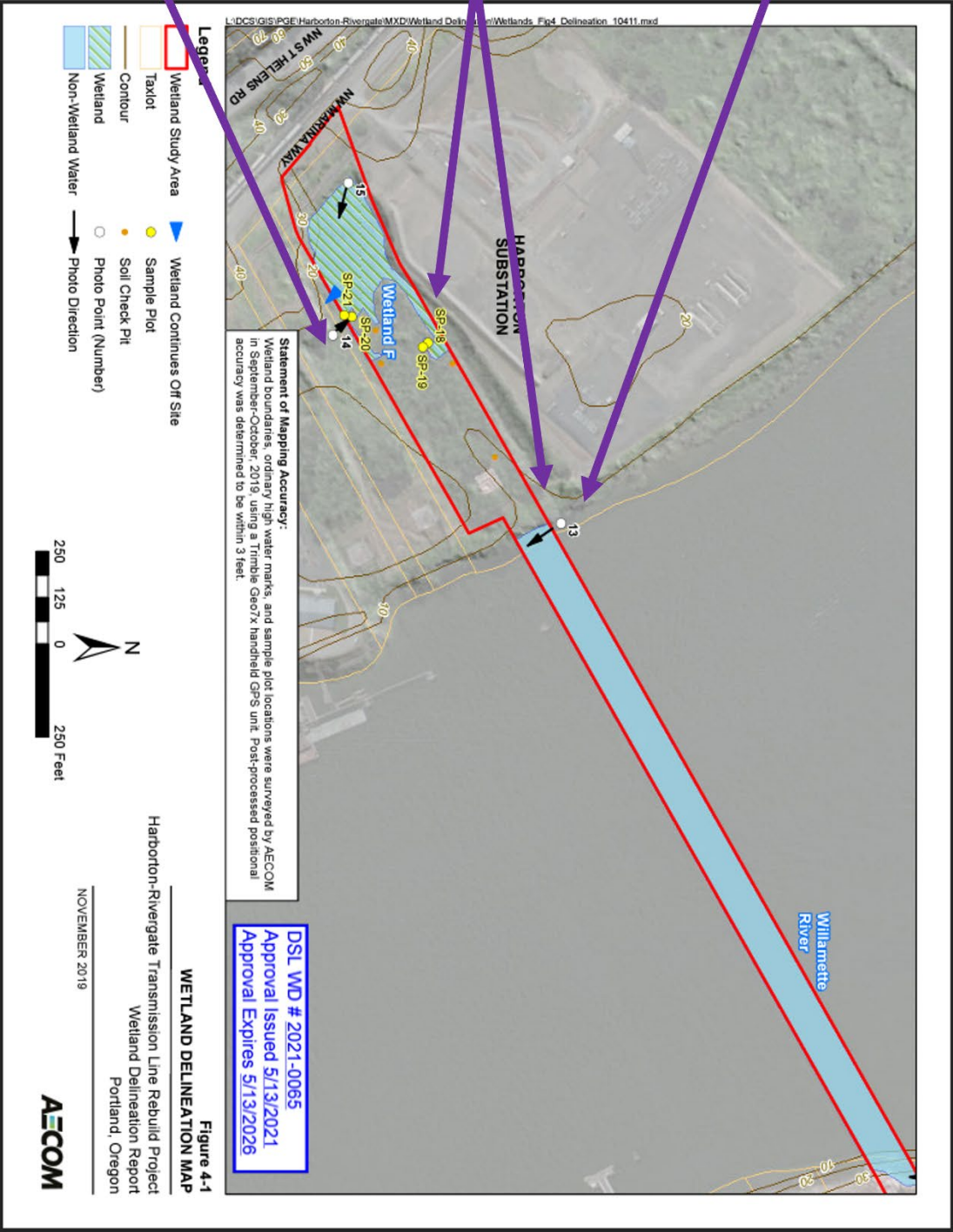




The river's ordinary high water line is roughly 20 feet NAVD88 at this location and the it appears the river may backwater into the PGE site through a culvert during bankfull stage.

North of this map's study area, there is a previously delineated ditched stream and wetlands here that have a free and open connection to the Willamette River.

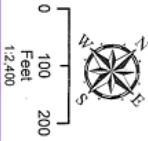
South of this map's study area, there are additional wetlands east of Photo Point 14.



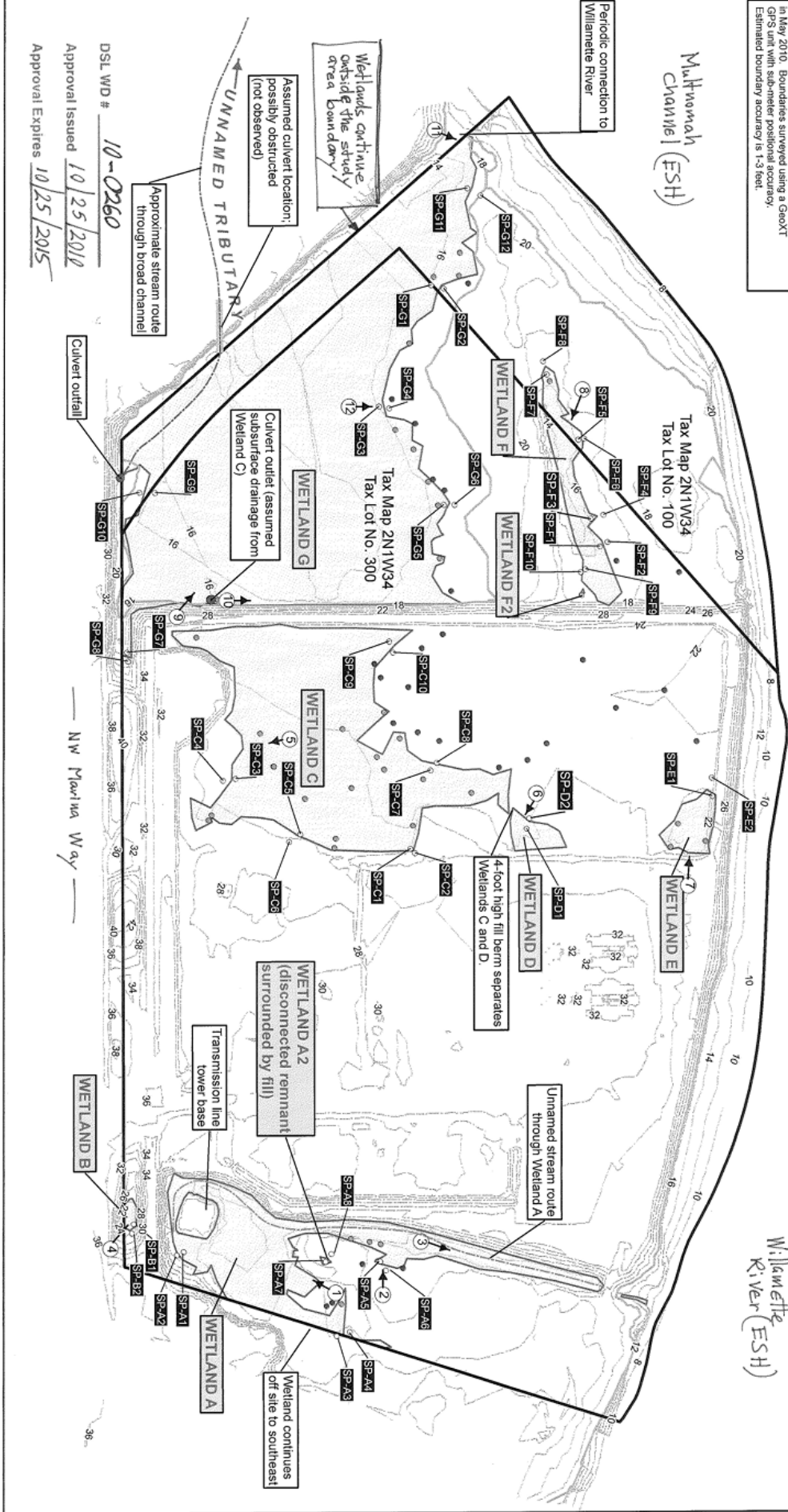
**Data Sources and Estimated Survey Accuracy Statement:**  
 Topographic contours and Ordinary High Water Line surveyed by Jeff Danielson, PLS (COP Datum). Wetland Boundaries - Delineated and surveyed by URS in May 2010. Boundaries surveyed using a GeoXT GPS unit with sub-meter positional accuracy. Estimated boundary accuracy is 1-3 feet.

Filepath: K:\PGE\Harborton\DSL\_Review\_Map.mxd

- Legend**
- Study Area Tax Lots (#) → Photo Point/Direction
  - Wetland Delineation Boundary (URS 2010)
  - Wetland River OHWL (18 COP)
  - 2-Foot Survey Contours (PGE)
  - Documented Sample Plot
  - Undocumented Dry Pit (dry to 18" + bgs)
  - Undocumented Wet Pit (free water within 16" bgs)

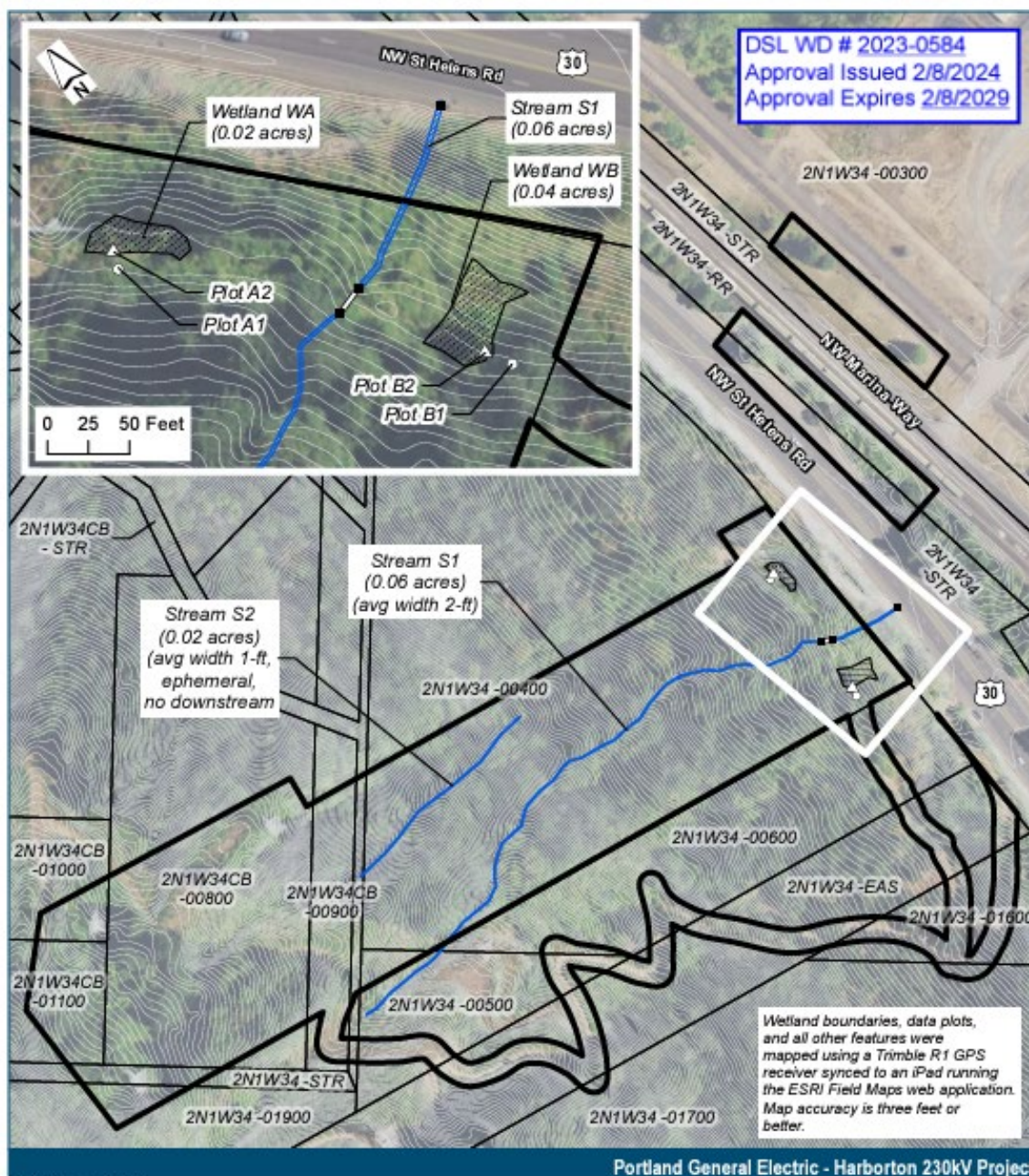


DSL WD # 10-0260  
 Approval Issued 10/25/2012  
 Approval Expires 10/25/2015

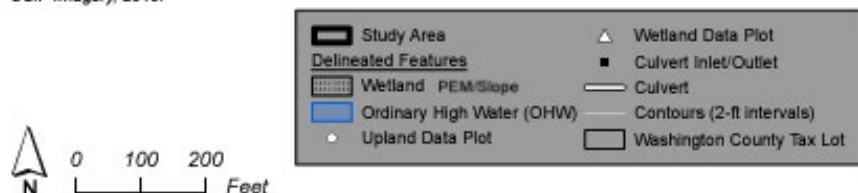


**Wetland Detail Map  
 For DSL Review**  
 Wetland Delineation Report  
 PGE Harborton Property  
 Portland, Oregon  
 October 2010  
 Prepared for Portland General Electric  
**URS**





OSIP Imagery, 2019.



**Figure 6**  
Wetland Delineation



Path: P:\VP\PGEX\0000000000000000\WFOG\SI\PGEX\0005.aprx



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Ave, Suite 613, Portland, Oregon 97204 ■ Mingus Mapps, Commissioner ■ Dawn Uchiyama, Director

## Completeness Response

**Date:** May 21, 2024

**To:** Christine Caruso, BDS Land Use Services  
503-865-6420, Christine.Caruso@portlandoregon.gov

**From:** Ella Ruth, BES Systems Development  
503-823-8068, Ella.Ruth@portlandoregon.gov

**Case File:** LU 24-041109

**Proposal:** Portland General Electric (PGE) is requesting approval to construct a new 1,400-foot-long segment of transmission corridor and shift a portion of existing transmission corridor slightly south to make necessary wire routing improvements. All work in Forest Park is proposed within existing PGE utility easements. To install two new steel poles and shift one existing pole south, PGE must clear 4.78 acres of forest habitat in the park. This is forest that is currently surrounded by utility corridors on all sides. Work would also occur at PGE's Harborton Substation at 12500 NW Marina Way, including 3 new poles in the gravel parking area west of the substation and temporary access in the wetland south of the substation to reconfigure wiring on existing towers. The project is needed to address system vulnerabilities and provide the power supply and system redundancy needed to accommodate current and near-term power demands. Stormwater: The project proposes only negligible new impervious associated with two new pole foundations (~226 square feet total). This clean runoff would infiltrate in surrounding forest soils. During construction, stormwater will be managed per the Construction Stormwater Best Management Practices Manual for the 1200-C NPDES General Permit.

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BES provides the following comments in response to materials received for the purpose of determining completeness of the above-referenced Land Use application. Items requested in this memo should not be considered final, as staff reserves the right to request additional materials during the formal review period.

1. **Drainageway Protection:** City records indicate there is a drainageway on the subject site located on 12500 NW Marina Way (R714233).
  - a. **Drainageway:** A drainageway is defined as a constructed or natural channel or depression that may at any time collect and convey water; it may be permanently or temporarily inundated. Depending on the capacity of the drainageway and size of the proposed development, the identified drainageway may serve as a disposal location for stormwater runoff from the project.
  - b. **Drainage Reserve:** Drainageways are protected by means of a drainage reserve except when the drainageway is adequately protected by an Environmental Protection overlay zone, another overlay zone that provides equivalent or better protection as determined by BES, or a tract (such as an Environmental Resource Tract) that equally or better meets the purpose of the drainage reserve, as determined by BES. Drainage reserves act as no-build areas and are intended to protect flow conveyance and water quality in both natural and constructed surface channels. Drainage reserves are typically delineated 15 feet from the centerline of the channel on both sides; however, a drainage reserve may be wider than 30 feet if needed to adequately protect the channel and bank. The applicant should refer to Chapter 5 of the SWMM for drainage reserve information and/or contact BES staff (identified above) for assistance.
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  - b. **Drainage Reserve Channel Encroachment:** An encroachment located within 10 feet of the channel centerline. For drainage reserves with a total width other than 30 feet, the channel encroachment area will be determined on a case-by-case basis through the encroachment review process.

Based on the submitted plans, it appears that the proposed development will encroach into the drainage reserve. However, BES has not received the necessary drainage reserve submittal information to review the proposed encroachment. Refer to Section 5.5 for information related to encroachments, Section 5.6 for mitigation requirements, and Section 5.9 for drainage reserve submittal requirements. The applicant may also contact BES staff to discuss specific submittal items necessary for the proposed encroachment. Once this information has been provided, BES will determine if the proposed encroachment can be approved.





PORTLAND BUREAU OF TRANSPORTATION

1900 SW Fourth Ave., Suite 5000 Portland, OR 97201 503-823-5185  
Fax 503-823-7576 TTY 503-823-6868 [www.portlandoregon.gov/transportation](http://www.portlandoregon.gov/transportation)

## RESPONSE TO THE BUREAU OF DEVELOPMENT SERVICES REQUEST FOR COMPLETENESS REVIEW

LU: 24-041109-000-00-LU Date: May 21, 2024  
To: Morgan Steele, Bureau of Development Services, B299/R5000  
From: Tammy Boren-King, B106/800, 503-823-2948, [tammy.boren-king@portlandoregon.gov](mailto:tammy.boren-king@portlandoregon.gov)  
Applicant: Portland General Electric \*Randy Franks\* & Portland General Electric \*Meredith Armstrong\*  
PORTLAND GENERAL ELECTRIC  
121 SW SALMON ST  
PORTLAND, OR 97204

Location:

TYPE OF REQUEST: Type 3 procedure CU - Conditional Use

### DESCRIPTION OF PROJECT

Portland General Electric (PGE) is requesting approval to construct a new 1,400-foot-long segment of transmission corridor and shift a portion of existing transmission corridor slightly south to make necessary wire routing improvements. All work in Forest Park is proposed within existing PGE utility easements. To install two new steel poles and shift one existing pole south, PGE must clear 4.78 acres of forest habitat in the park. This is forest that is currently surrounded by utility corridors on all sides. Work would also occur at PGE's Harborton Substation at 12500 NW Marina Way, including 3 new poles in the gravel parking area west of the substation and temporary access in the wetland south of the substation to reconfigure wiring on existing towers. The project is needed to address system vulnerabilities and provide the power supply and system redundancy needed to accommodate current and near-term power demands. Stormwater: The project proposes only negligible new impervious associated with two new pole foundations (~226 square feet total). This clean runoff would infiltrate in surrounding forest soils. During construction, stormwater will be managed per the Construction Stormwater Best Management Practices Manual for the 1200-C NPDES General Permit.

### RESPONSE

Portland Transportation/Development Review has reviewed the application for its potential impacts regarding the public right-of-way, traffic impacts and conformance with adopted policies, street designations, Title 33, Title 17, and for potential impacts upon transportation services.

#### Environmental Review Approval Criteria

There are no transportation related approval criteria for the environmental review component of the subject case.

#### Conditional Use Approval Criteria

The transportation related approval criteria related to the proposed Conditional Use that must be addressed are found in PZC Sections 33.815.230.B. The applicant provided a narrative sufficient for completeness review purposes.

**Public Improvements**

The project will not meet the thresholds in 17.88.020 or TRN 1.30 for when the Portland Bureau of Transportation (PBOT) requires public improvements. No dedication or street improvements are required.

The plans do not show any work happening a right-of-way controlled by PBOT.

The proposal includes work that will string new utility lines over the public rights-of-way for both NW Marina Way and NW St. Helens Rd., both of which are Oregon Department of Transportation (ODOT) facilities. All permitting for this activity is through ODOT. The applicant's narrative reflects that they are currently working with ODOT to permit this activity including the necessary highway lane closure.

**RECOMMENDATION**

PBOT has no objection to the application being deemed complete.



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**  
FROM CONCEPT TO CONSTRUCTION

Carmen Rubio, Commissioner  
David Kuhnhausen, Interim Director  
Phone: (503) 823-7300  
TTY: 711  
[www.portland.gov/bds](http://www.portland.gov/bds)

## Review For Completeness Response

To: Christine Caruso, 503-865-6420, LUR Division  
From: Kevin Wells, Site Development 503-823-5618

Location/Legal: BLOCK 11 E OF COMPROMISE LINE LOT 1-3, HARBORTON; BLOCK 11 W OF COMPROMISE LINE LOT 1-3 LOT 4-7, HARBORTON; BLOCK 11 LOT 11, HARBORTON; BLOCK 11 LOT 12, HARBORTON; TL 500 1.80 ACRES, SECTION 34 2N 1W; TL 300 62.97 ACRES DEPT OF REVENUE, SECTION 34 2N 1W; TL 400 15.79 ACRES, SECTION 34 2N 1W; TL 1900 9.74 ACRES, SECTION 34 2N 1W

Land Use Review: LU 24-041109  
Proposal: Portland General Electric (PGE) is requesting approval to construct a new 1,400-foot-long segment of transmission corridor and shift a portion of existing transmission corridor slightly south to make necessary wire routing improvements. All work in Forest Park is proposed within existing PGE utility easements. To install two new steel poles and shift one existing pole south, PGE must clear 4.78 acres of forest habitat in the park. This is forest that is currently surrounded by utility corridors on all sides. Work would also occur at PGE's Harborton Substation at 12500 NW Marina Way, including 3 new poles in the gravel parking area west of the substation and temporary access in the wetland south of the substation to reconfigure wiring on existing towers. The project is needed to address system vulnerabilities and provide the power supply and system redundancy needed to accommodate current and near-term power demands. Stormwater: The project proposes only negligible new impervious associated with two new pole foundations (~226 square feet total). This clean runoff would infiltrate in surrounding forest soils. During construction, stormwater will be managed per the Construction Stormwater Best Management Practices Manual for the 1200-C NPDES General Permit.

Quarter Sec. Map: 1717, 1718, 1816, 1817, 1818  
Date: May 21, 2024

The Bureau of Development Services (BDS) Site Development section provides the following comments based on the land use application and documents provided by the Applicant. References to Portland City Code (PCC) may be included below. City codes are available for on-line review from the City Auditor's [Online Charter and Code page](#).

### Response Summary

Site Development determines that the material submitted for review are insufficient.

**The applicant must submit a geotechnical report and/or slope hazards report to assess the potential for slope instability both during and after construction.** This information is required to facilitate review of the construction management plan, limits of disturbance, and impacts to adjoining property. A geotechnical report and/or slope hazards evaluation is also

required to determine if engineered mitigation is required to reduce slope hazards until mitigation plantings are well established (buttresses, debris flow diversion structures, specialized construction staging, etc.). Site Development's key concern is the potential for slope instability, debris flows within existing drainages, and debris flow outbursts along Highway 30 (or other adjoining property) resulting from the proposed tree removal.

## **Key Comments from Early Assistance (EA) Meeting 22-142455-EA**

### **Slope Hazards**

The project is characterized by steeply sloping terrain that is susceptible to landslide activity. In addition, the project area encroaches over an existing pre-historic landslide. Site Development is concerned that the proposed clearing, grading, and tree removal will alter slope and groundwater conditions potentially impacting the stability of the existing slopes. Key hazards of concern include surficial slope instability, general slope instability, and debris flow failure (i.e. debris flows resulting from slope failures that are propelled into narrow drainages depositing onto Highway 30).

### **Geotechnical and Slope Hazards Report**

The applicant must provide a geotechnical report and slope hazards report with any building permit or land use application. The geotechnical report must be prepared by an Oregon-registered professional engineer with experience in geotechnical engineering. The geotechnical report must summarize the subsurface conditions, including groundwater, and provide the engineer's quantitative evaluation of existing and proposed slope stability conditions for both static and seismic cases. The engineer must also provide recommendations for clearing, grading, and slope hazard mitigation where the proposed work results in an unsuitable factor of safety against sliding.

Geologic hazards (slope hazards) should be evaluated by a geotechnical engineer and certified engineering geologist (CEG) to assess geomorphology, historic and pre-historic landslide activity, and groundwater factors that may aggravate slope instability. Guidelines for conducting slope hazard evaluations are presented on the City's website, which can be accessed [here](#). At a minimum, slope hazard investigations and reports must include:

1. A site reconnaissance conducted by a Certified Engineering Geologist where deep-seated pre-historic and historic landslides are required to be evaluated.
2. Subsurface investigations which extend below possible failure surfaces anticipated to have a factor of safety of less than 1.5 under static loading or 1.0 under seismic loading.
3. Investigation to determine the location of groundwater within the area of interest.
4. Strength testing of the soils of interest; either in-situ testing, laboratory testing, or both. Strength correlations for in-situ testing shall be well documented.
5. Geologic cross sections for the critical slope sections analyzed, including assumed piezometric surfaces.
6. Detailed descriptions of the analysis methods used and assumptions made in the numerical modeling.
7. Recommendations for temporary and permanent surface and subsurface drainage elements.
8. Discussion of the effects of on-site effluent disposal and stormwater disposal systems, existing or proposed, on slope stability.
9. Detailed laboratory testing results attached within a report appendix.

10. Detailed subsurface investigation results attached within a report appendix.
11. Geotechnical recommendations for site development, grading, and construction.
12. Recommendations for site development and mitigation measures required to achieve the minimum allowable factors of safety against slope instability.
13. Recommendations for temporary and permanent erosion control.
14. A statement of understanding of the performance criteria and expected displacements under seismic loading conditions.
15. A statement that the construction plans have been reviewed by the project Geotechnical Engineer or project Certified Engineering Geologist for conformance with the recommendations of the slope hazard evaluation and geotechnical engineering report. The date listed on the reviewed plans should be stated.

Note: In addition to the above criteria, the geotechnical engineer and engineering geologist must evaluate the impact of the proposed clearing, grading, and tree/shrub removal on slope stability.





## Wetland Land Use Notification

### OREGON DEPARTMENT OF STATE LANDS

775 Summer Street NE, Suite 100, Salem, OR 97301-1279

Phone: (503) 986-5200

This form is to be completed by planning department staff for mapped wetlands and waterways.

\* Required Field    (?) Tool Tips

### Activity Location



**Township** \* (?)

02N

**Range** \* (?)

01W

**Section** \* (?)

34

**Quarter-quarter Section** (?)

**Tax Lot(s)** \*

400

You can enter multiple tax lot numbers within this field. i.e. 100, 200, 300, etc.

To add additional tax map and lot information, please click the "add" button below.

### Address

Street Address

Forest Park & Harborton Substation

Address Line 2

12500 NW Marina Way

City

Portland

Postal / Zip Code

State

OR

Country

Multnomah

**County** \*

Multnomah

**Adjacent Waterbody**

Stream 1 and Stream 2,  
Wetland A and Wetland B

**Geolocation** \*

45.61014, -122.797985

### Proposed Activity



Prior to submitting, please ensure proposed activity will involve physical alterations to the land and/or new construction or expansion of footprint of existing structures.

**Local Case File #** \* (?)

LU 24-041109 CU EN GW

**Zoning**

OScp, IHkgq

**Describe any Earthwork/Ground Disturbance** \*

The proposed transmission line activities will result in significant impacts to 4.7 acres of natural resources within Forest Park including the removal of 376 living trees and 21 dead trees (7,604 inches diameter breast height), permanent fill of two existing wetlands (Wetland A and Wetland B) and impacts to two streams (Stream 1 and Stream 2).

## Proposed

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Building Permit (new structures) | <input checked="" type="checkbox"/> Conditional use Permit |
| <input checked="" type="checkbox"/> Grading Permit                   | <input type="checkbox"/> Planned Unit Development          |
| <input checked="" type="checkbox"/> Site Plan Approval               | <input type="checkbox"/> Subdivision                       |
| <input checked="" type="checkbox"/> Other (please describe)          |  |
| Environmental Review & Greenway Review                               |  |

## Applicant's Project Description and Planner's Comments: \*

The applicant, Portland General Electric (PGE), is requesting approval to conduct utility improvements within their existing utility easement in Forest Park. These improvements include shifting the location of one power pole and rewiring a segment of existing transmission line to that new pole location (the Harborton-Trojan #1 and #2 230 kV lines) and installing two new poles to support a new, 1,400-foot-long segment of transmission lines (Evergreen-Harborton and Harborton-St. Mary's 230 kV lines). Both the shifted and new transmission line segments will connect west to existing PGE lines within Forest Park and span east across Highway 30 to PGE's existing Harborton Substation.

## Required attachments with site marked: Tax map and legible, scaled site plan map. (?)

LU 24-041109 Zone Map.pdf	669.61KB
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## Additional Attachments

Exhibit E - Proposed Development - 22x34.pdf	98.39MB
Exhibit F - Construction Management Plan - 22x34.pdf	168.94MB

## Applicant

### First Name \*

Meredith

### Last Name \*

Armstrong

### Applicant Organization Name

(if applicable)

Portland General Electric

### Mailing Address \*

Street Address

121 SW Salmon Street

Address Line 2

City

Portland

Postal / Zip Code

97204

State

OR

Country

Multnomah

### Phone (?)

503-867-2529

### Email (?)

meredith.armstrong@pgn.com

## Is the Property Owner name and address the same as the Applicant? \*

☐ No ☐ Yes

## Property Owner

### First Name \*

Laura

### Last Name \*

Lehman

### Property Owner Organization Name

(if applicable)

City of Portland Parks & Recreation

### Mailing Address (If different than Applicant Address)

Street Address

1120 SW 5th Avenue

Address Line 2

#1302

City

Portland

Postal / Zip Code

97204

State

OR

Country

Multnomah

**Phone** (?)

971-930-0104

**Email** (?)

Laura.Lehman@portlandoregon.gov

### Responsible Jurisdiction



\*

☒ City of ☐ County of

**Municipality** \*

Portland

**Date** \*

11/5/2024

### Staff Contact

**First Name** \*

Morgan

**Last Name** \*

Steele

**Phone** \* (?)

503-865-6437

**Email** \*

Morgan.Steele@portlandoregon.gov



# Wetland Land Use Notice Response

## Response Page

Department of State Lands (DSL) WN# \*

WN2024-0781

## Responsible Jurisdiction

### Staff Contact

Morgan Steele

### Jurisdiction Type

City

### Municipality

Portland

### Local case file #

LU 24-041109 CU EN GW

### County

Multnomah

## Activity Location

### Township

02N

### Range

01W

### Section

34

### QQ section

### Tax Lot(s)

400

### Street Address

Forest Park & Harborton Substation

### Address Line 2

12500 NW Marina Way

### City

Portland

### Postal / Zip Code

### State / Province / Region

OR

### Country

Multnomah

### Latitude

45.610874

### Longitude

-122.801832

## Wetland/Waterway/Other Water Features

- ☒ There are/may be wetlands, waterways or other water features on the property that are subject to the State Removal-Fill Law based upon a review of wetland maps, the county soil survey and other available information.
- ☒ The National Hydrography Dataset shows wetland, waterway or other water features on the property
- ☒ Local Wetlands Inventory shows wetland, waterway or other water features on the property

## Your Activity

- ☒ It appears that the proposed project **may** impact wetlands and **may** require a State permit.

## Applicable Oregon Removal-Fill Permit Requirement(s)



- ☒ A state permit is required for 50 cubic yards or more of fill removal or other ground alteration in wetlands, below ordinary high water of waterways, within other waters of the state, or below highest measured tide.

## DSL Review



### Wetland Ecologist Comments

I cannot determine, with the provided materials, where the disturbance footprint is in relation to the tax lot boundaries involved. There appears to be a wetland delineation for at least part of this study area, WD2023-0584. Please reference this approved delineation of the study area encompasses the proposed disturbance completely on whether wetlands would be impacted. Please send a map of the proposed disturbance in relation to the tax lot boundaries (larger scale) to my email address if the proposed footprint is anywhere outside of the delineation study area.

**This is a preliminary jurisdictional determination and is advisory only.**

This report is for the State Removal-Fill law only. City or County permits may be required for the proposed activity.

- ☒ A Federal permit may be required by The Army Corps of Engineers: (503)808-4373

### Contact Information

For information on permitting, use of a state-owned water, wetland determination or delineation report requirements please contact the respective DSL Aquatic Resource, Proprietary or Jurisdiction Coordinator for the site county.

### Response Date

12/5/2024

### Response by:

Matthew Unitis

### Response Phone:

503-910-1559



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**  
FROM CONCEPT TO CONSTRUCTION

Dan Ryan, Commissioner  
Rebecca Esau, Director  
Phone: (503) 823-7300  
Fax: (503) 823-5630  
TTY: (503) 823-6868  
www.portland.gov/bds

## **BDS – Conference Facilitator Summary Memo**

### **Pre-Application Conference**

**Date:** July 11, 2022

**To:** Chip Bloomer, Portland General Electric, Chip.Bloomer@pgn.com

**From:** Matt Wickstrom, Conference Facilitator  
Matt.Wickstrom@portlandoregon.gov, 503-865-6513

**Case File:** EA 22-142445

**Location:** 12500 NW Marina Way (substation) and PGE Corridor, See Attached Plan View

**Property ID:** R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044

**Proposal:** A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

This conference summary report identifies the participants at the conference, provides an initial response to the issues and requirements for the proposed project with separate response from key bureau representatives. This memo identifies current land use review fee information and provides related information that may be helpful as the project moves from concept to completion.

Pre-Application Conferences are required for all major (Type III and IV procedure) land use reviews. The purpose of the conference is to inform the applicant of the substantive and procedural requirements of the Land Use Review, to identify the submittal requirements and documents this information for the applicant and all interested persons.

The information provided at the conference and included in this summary is based on the information that was submitted prior to and at the meeting and reflects regulations in effect at the time of the conference. The meeting is intended to convey information. It is not a public hearing and no land use decision is rendered at the conference. Interested persons may attend the conference and obtain copies of all the written information that is submitted and prepared for it.

**You must submit your Land Use Review application within two-years of the Conference.**

**Conference date: June 9, 2022**  
**Expiration of Conference: June 8, 2024**

**A. Comments from Bureau Representatives:** The chart below identifies the staff who participated in the conference and/or who submitted written comments:

Response attached	Bureau	Responsibilities	Contact
Yes	BDS Land Use Services	Review of land use review	Amanda Rhoads 503-865-6514  Morgan Steele 503-865-6825
Yes	PBOT	Public Streets	Tammy Boren-King 503-823-2948
Yes	BES	Sanitary sewer service, public and private stormwater management, drainageways and drainage reserves, source control	Ella Indarta 503-823-8068
Yes	BDS Site Development	Septic systems, private rights-of-way, geotechnical requirements, erosion control	Kevin Wells 503-823-5618
Yes	Water Bureau	Connections to public water	Benjamin Kersens 503-865-6370
No	Fire Bureau	Access grades, fire hydrants, turnarounds	Dawn Krantz 503-823-3718
Yes	Urban Forestry	Street trees	Mariano Masolo 503-823-4560
Yes	Portland Parks & Recreation, Parks and Trails Planning	Impacts on Portland parks and trails	Laura Lehman 971-930-0104
No	devTeam Portland, BDS	Further information on devTeam Portland can be accessed at:  <a href="#">Process Management - Major Projects Group   Portland.gov</a>	Alice Nielsen 503-823-3448

Please refer to the memo from Morgan Steel, Land Use Services, for the list of application submittal requirements for the required land use review(s). Also, the attached responses from the City bureaus identify additional requirements that are pertinent to the land use review or a later Building Permit submittal.

If you have questions about comments included in this Pre-Application Summary Report, please contact the representative identified in the respective memo. Please note that staff comments are based on the information submitted at the time of application. If you have questions regarding the proposal beyond those covered in this summary report, or if your proposal changes in scope or configuration, a new Pre-Application Conference may be required or an additional Early Assistance application may be needed to provide responses to your follow-up questions.

**B. Fees**

Below is an estimate of land use fees that may apply to your proposal. Fees charged will be those in effect when the Land Use Review application is submitted. When more than one Land Use



Review is requested, full fees are charged for each additional review. The fees below are current; however, fees will increase effective July 1, 2022. You may view the current [Land Use Review fees](https://www.portland.gov/sites/default/files/2021/2021-07-01-bds-final-fee-schedules-land-use_0.pdf) at the following link: [https://www.portland.gov/sites/default/files/2021/2021-07-01-bds-final-fee-schedules-land-use\\_0.pdf](https://www.portland.gov/sites/default/files/2021/2021-07-01-bds-final-fee-schedules-land-use_0.pdf).

<b>Land Use Review Type</b>	
Type III Conditional Use Review	\$24,048
Type III Environmental Review	\$10,644
Type II Greenway Review	\$12,292

During the building permit process, Permit Fees will be charged for review of your permits and Systems Development Charges (SDCs) may be assessed for new development. An online fee estimator is available on the BDS website at the following link: [Estimate the Cost of Your Building Permit | Portland.gov](#).

### C. Other Information

1. Preliminary Life Safety Plan Review Consultation: For Building Code/Life Safety information, you may sign up for a Preliminary Life Safety meeting. Information can be found at the following link: [Life Safety Preliminary Meeting Request Packet | Portland.gov](#)

2. Electric Service Requirements. Information on electric service requirements for properties served by PGE can be found at the following link: <https://www.portlandgeneral.com/construction/electric-service-requirements>; and information on electric service requirements for properties served by Pacific Power can be found at the following link: <https://www.pacificpower.net/working-with-us/builders-contractors/electric-service-requirements.html>

Please note that the service requirements included in these links may not cover all requirements associated with your project. Applicants should contact the PGE Service Coordinator at 503-736-5450 or the Pacific Power Business Center at 888-221-7070 to identify issues that are specific to your project and to coordinate electric service requirements.

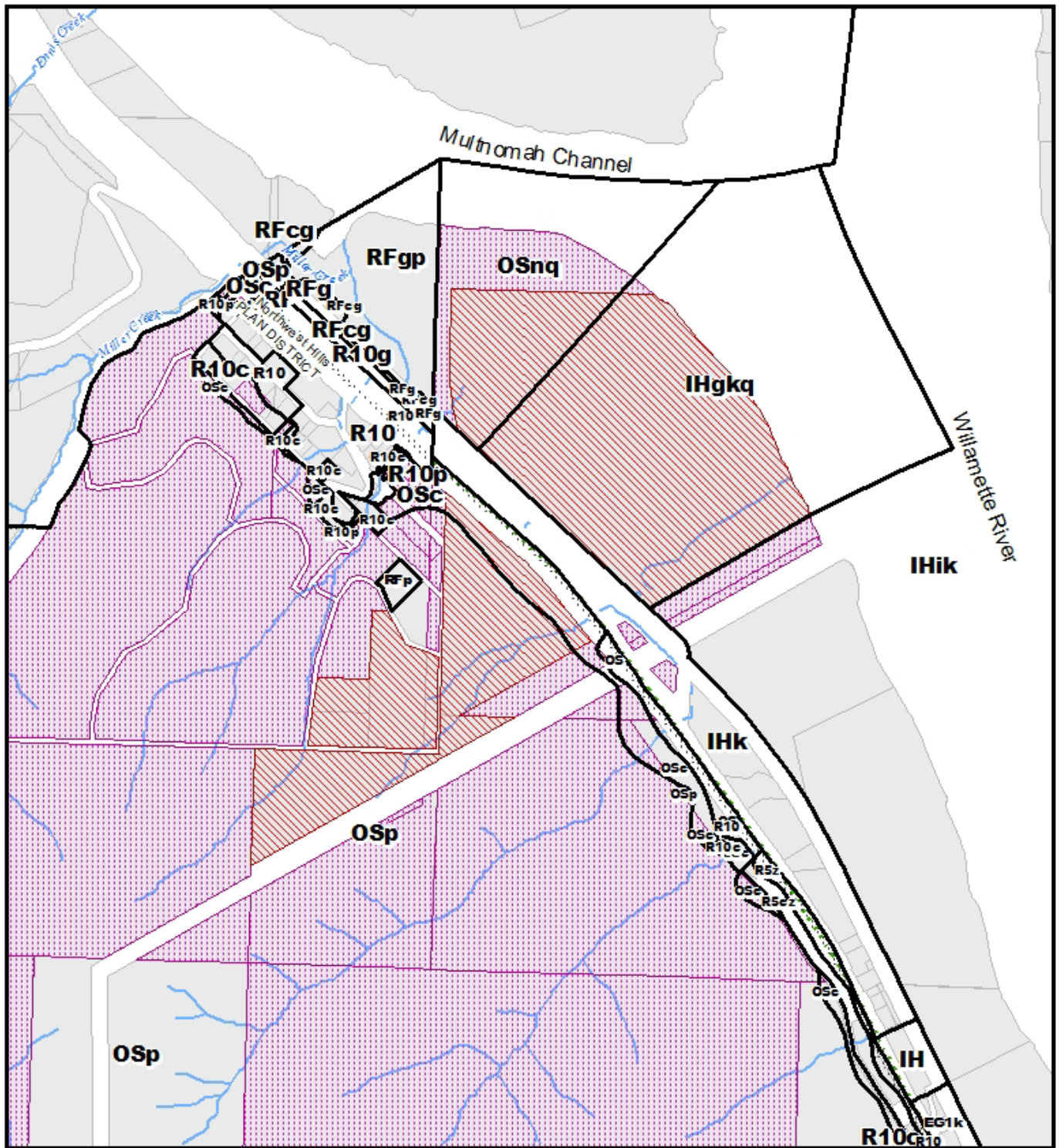
3. PGE requires minimum clearances from electric wires, conductors and cables. Before building, please be aware of these clearances by calling PGE at 503-736-5450. For more information on the [PGE Minimum Clearance Requirements](#) use the following link: [Why You Should Respect Portland General Electric's Power Line Clearances | Portland.gov](#).
4. Portland Housing Bureau. The Housing Bureau provides financial assistance for various development phases to both nonprofit and for-profit affordable housing developers (typically multi-dwelling rental housing). For more information, go to the following link: <https://www.portland.gov/phb>.
5. Bureau of Planning and Sustainability. The Bureau of Planning and Sustainability delivers policy and programs related to green buildings, energy efficiency, renewable resources, waste reduction, and recycling. For more information on [Sustainability Programs and Services](#) in the Bureau of Planning and Sustainability go to the following link: <https://www.portlandoregon.gov/bps/67121>.
6. Energy Trust of Oregon. The [Energy Trust of Oregon](#) provides technical assistance and cash incentives for energy efficient design. For more information, go to the following link: <https://www.energytrust.org/>






Oregon Department of Energy. The [Oregon Department of Energy](http://www.oregon.gov/energy/Pages/index.aspx) Conservation Division provides information on a variety of programs to encourage energy conservation, including tax rebates and low-interest energy loans. For more information, go to the following link:  
<http://www.oregon.gov/energy/Pages/index.aspx>

**Attachments:**

Zoning Map  
Site Plan  
BDS Land Use Services Response  
PBOT Response  
BES Response  
BDS Site Development Response  
Water Bureau Response  
Urban Forestry Response  
Parks and Trails Planning Response  
Sign-in Sheet



**ZONING**   
 For Zoning Code in effect Post August 1, 2021  
 NORTHWEST HILLS PLAN DISTRICT  
 FOREST PARK SUB DISTRICT

 Also Owned Parcels  
 Recreational Trails

File No.	EA 22 - 142445 PC
1/4 Section	MULTIPLE
Scale	1 inch = 800 feet
State ID	2N1W34 400
Exhibit	B May 17, 2022







**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**  
FROM CONCEPT TO CONSTRUCTION

Dan Ryan, Commissioner  
Rebecca Esau, Director  
Phone: (503) 823-7300  
Fax: (503) 823-5630  
TTY: (503) 823-6868  
[www.portland.gov/bds](http://www.portland.gov/bds)

## BDS – Land Use Planner Response

### Pre-Application Conference

**Date:** June 17, 2022

**To:** Matt Wickstrom, Conference Facilitator  
503-823-6825 | [Matt.Wickstrom@portlandoregon.gov](mailto:Matt.Wickstrom@portlandoregon.gov)

**From:** Morgan Steele  
503.865.6437 | [Morgan.Steele@portlandoregon.gov](mailto:Morgan.Steele@portlandoregon.gov)  
Amanda Rhoads  
503.865.6514 | [Amanda.Rhoads@portlandoregon.gov](mailto:Amanda.Rhoads@portlandoregon.gov)

**File No.:** 22-142445

**Location:** 12500 NW Marina Way west to Forest Park

**Tax Account:** R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044

**State ID Number:** 2N1W34CB 00900, 2N1W34CB 00800, 2N1W34CB 01000, 2N1W34CB 01100,  
2N1W34 00500, 2N1W34 00300, 2N1W34 00400, 2N1W34 01900

**Proposal:** A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGE's existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

The information provided at the conference and included in this response is based on the information you provided prior to and at the conference and reflects regulations in effect at the time of the conference. This response provides information and guidance only. It is preliminary in nature and based on the information the applicant provided to BDS staff. It is neither a land use review nor a final decision regarding this project. References are to the Portland Zoning Code available online at <https://www.portland.gov/code/33>.

**Zoning:** *Base Zones:* Heavy Industrial (IH), Open Space (OS)  
*Overlay Zones:* Greenway River General (g), Greenway River Water Quality (q), Prime Industrial (k), Environmental Conservation (c), Environmental Protection (p)  
*Plan District:* Northwest Hills – Forest Park Subdistrict  
*Other:* Forest Park Natural Resources Management Plan

**A. Key Issues Applicable to this Project/Site:****Non-Conforming Upgrade Requirements:**

- If the valuation of the proposed improvements exceeds \$330,800 [as of June 17, 2022], the nonconforming upgrades requirements may apply (ADA upgrades, and stormwater facilities are exempt). This standard requires at least 10% of the project valuation to be spent bringing the site closer into conformance with listed standards including landscaping, parking lot landscaping (perimeter/interior), screening requirements for exterior storage, exterior display and exterior work activities and heavy trucks and equipment. These upgrades are applicable to the portions of the site within City of Portland jurisdictional boundaries and would be required in addition to zoning standards triggered outright for the new development area. You can request Adjustments for any standards required to be met for nonconforming upgrades (if Adjustments are allowed). Zoning Code Section 33.258.070.D applies to alterations to the site. Per 33.440.230.D, required Greenway landscaping must be completed first. The required landscaping must be shown to be met at the time of land use or permit review. See the *Greenway Development Standards* section below for further details.

**Base Zone Requirements:**

- **Type III Conditional Use Review.** This project would be considered a Rail Lines and Utility Corridors use (see Zoning Code Section 33.920.550). This use is conditional in the Open Space base zone per Table 100-1. Given the size of the exterior improvement area required for this project, the proposal would be subject to a Type III Conditional Use Review as a Major Alteration per Zoning Code Section 33.815.040.B.2 and 3.
- **Conditional Use Approval Criteria.** The relevant approval criteria for this review are in Zoning Code Section 33.815.230.A-B.
  - Criterion A requires that the utility corridor is sufficiently separated from nearby land uses so as to allow for buffering of the uses, in this case, the Parks and Open Areas use. For this criterion, please outline your plan to buffer the development from the surrounding use to limit impacts.
  - Criterion B requires that the corridor will not substantially impact existing or planned street system, or traffic, transit, pedestrian, and bicycle movement and safety. For this criterion, please see notes from PBOT on information required and whether a transportation study will be required.

**Plan District Requirements:**

**Northwest Hills Plan District Regulations:** <https://www.portlandoregon.gov/bps/article/53417>

The portion of the project west of Highway 30 is in the Northwest Hills Plan District within the Forest Park Subdistrict. Regulations that apply to this proposal can be found in Zoning Code Chapter 33.563. Specifically, 33.563.210, *Additional Approval Criteria* (see below for further details) and 33.563.100, *Prohibitions*: activities which expose soil to direct contact with stormwater between October 1 and April 30 are **prohibited**.

**Overlay Zone Requirements:**

- **Greenway Overlay Zone Regulations:** <https://www.portland.gov/sites/default/files/code/33.440-greenway-overlay-zones.pdf>
- **Greenway Review:** A portion of the project site is in the Greenway River General and River Water Quality overlay zones. Exterior alterations to development, within Greenway overlay zones, must be approved through a Type II Greenway Review.
- **Greenway Review Approval Criteria:** Your written narrative, submitted for Greenway Review, must include detailed, project specific findings for each of the applicable [Greenway Approval Criteria](#). Approval Criteria 33.440.350.A must be addressed and met. Per 33.440.350.A, findings must be included for each of the [Willamette Greenway Plan Design Guidelines](#).
- **Resource Inventory and Site:** Natural resources which have been identified by the City for protection in the Greenway overlay zones are listed in the [Lower Willamette River Wildlife Habitat Inventory](#) within Inventory Site



4.2B (Rank III). You should include this information in your application for Greenway Review, in the description of resources which might be impacted by the proposed development.

- **Greenway Development Standards:** Applicable standards in Zoning Code Section 33.440.230 must be addressed and met for each site at the time of land use or permit review. Per 33.440.230.D.1, if the valuation of the projects exceeds the Non-Conforming Development threshold (see above), the landscaping requirements will be triggered. Therefore, you will need to provide a landscaping plan showing how the site is currently meeting or will be brought into conformance with the landscaping standards of 33.440.230. Native plantings required within the Greenway overlay zones can be found in the *Portland Plant List*: <https://www.portland.gov/bps/envirom-planning/portland-plant-list>
- **Environmental Overlay Zone Regulations:** <https://www.portland.gov/sites/default/files/code/33.430-environmental-zones.pdf> & <https://www.portlandoregon.gov/bps/article/103939>
  - The subject site, west of Highway 30, is located in the Environmental Conservation and Environmental Protection overlay zones within the Forest Park Natural Resource Management Plan (FP NRMP) boundary. Please see the attached Zoning Map. Be sure to copy these zoning lines and designations precisely onto all site plans.
  - **Environmental Development Standards:** The standards in Zoning Code Section 33.430 do not directly apply to portions of the proposal within the [Forest Park Natural Resources Management Plan](#) (NRMP). The powerline installation proposal appears to be an Exception to the Plan, as the proposed disturbance exceeds 10,000 square feet, requiring approval through a Type III Environmental Review procedure.
  - **Environmental Review Approval Criteria:** Your proposal will require Environmental Review, as such you will need to demonstrate how the powerline installation project will meet the Approval Criteria for Exceptions listed in Chapter 8 of the NRMP (page 217, listed below). These approval criteria supersede the approval criteria of 33.430. Please use the [Environmental Review Submittal Checklist](#) as a guide in preparing your application.
    - ❖ Approval Criteria for Minor Amendments: The amendment will be approved if:
      - A. There is a demonstrated need for the proposal.
      - B. The proposed action is consistent with the Forest Park Natural Resources Plan Goals and Strategies (found in Chapter 6 of the NRMP). Please provide responses to each of the Goals (Conservation and Recreational and Educational) and all 10 Strategies.
      - C. Alternative locations and design modifications were evaluated to show that the proposal has the least significant environmental impact of the practicable alternatives.
      - D. A construction management plan and a mitigation plan will minimize impacts on resource and restore adjacent disturbed areas.
    - ❖ Approval Criteria for Exceptions to the Plan: The exception will be approved if:
      - A. The proposal meets all the criteria for minor amendments.
      - B. The proposal is a park-related development, or no alternative locations exist outside of Forest Park for the proposal.
      - C. There are no practicable alternative locations within Forest Park suitable for the use in which the development will have less adverse impact on resource values.
      - D. Any long-term adverse impacts of the proposed action on resource values are fully mitigated within the Management Unit.
      - E. The proposal is consistent with the purpose of the Environmental Zones.
- An application for Environmental Review must include an alternatives analysis that will satisfy Criteria C above. This analysis should consider locations, layouts, and corridors, and evaluate each alternative based on its impact on the resources and functional values at the site—waterbodies, trees, and habitat. **At this time,**

**the current proposal does not appear to meet applicable approval criteria based on its impacts to high-value resources and their functional values. Staff encourages the applicant to explore alternative locations (including and most importantly outside Forest Park), layouts, corridors, and construction methods that do not require the clearing of six acres of pristine upland forest habitat.**

- As noted above, the current proposal does not currently meet multiple approval criteria including but not limited to, alternative locations, minimization of impacts to resources, appropriate mitigation, and consistency with the purpose of the Environmental Zones (copied below). And, as required by the Approval Criteria for Minor Amendments (B), the project does not appear consistent with the Forest Park Natural Resources Plan Goals and Strategies (found in Chapter 6 of the NRMP).

❖ **33.430.010 Purpose**

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.

❖ **33.430.015 Purpose of the Environmental Protection Zone**

The Environmental Protection zone provides the highest level of protection to the most important resources and functional values. These resources and functional values are identified and assigned value in the inventory and economic, social, environmental, and energy (ESEE) analysis for each specific study area. Development will be approved in the environmental protection zone only in rare and unusual circumstances.

❖ **33.430.017 Purpose of the Environmental Conservation Zone**

The Environmental Conservation zone conserves important resources and functional values in areas where the resources and functional values can be protected while allowing environmentally sensitive urban development.

- A narrative (and graphic) construction plan is required that identifies measures that will be taken during construction to protect the remaining resources and functional values at and near the construction site. Plans must clearly show where construction access will be for the development, as well as where materials will be stockpiled during construction. Plans must show a temporary construction fence surrounding these construction areas. Plans must show all proposed grading and areas of cut and fill.
- Removal of trees, impacts to waterbodies/wetlands, and disturbance of soil within the NRMP must be mitigated. Mitigation must fully compensate for any long-term adverse impacts of the proposed action on resources and functional values. The area of impacts is currently a pristine, upland forest habitat which houses eagle nests, streams, mature trees, and provides habitat for several other wildlife species. **Currently, the scale of impact may be too large to successfully mitigate, given the value of the resources in the project area. The feasibility of sufficient mitigation should be a major consideration in the design of this project.**
- **Resource Inventory and Site:** Natural resources which have been identified by the City for protection in the Environmental Zones are listed in the [Northwest Hills Natural Areas Protection Plan](#) within Resource Site 104 – Harborton Uplands. You should include this information in your application for Environmental Review, in the description of resources which might be impacted by the proposed development – specifically trees and waterbodies.
- **Required Site Plans:** You will need to prepare an Existing Conditions Plan, a Proposed Development Plan, a Construction Management Plan, and a Mitigation/Planting Plan for your Environmental Review & Greenway Review application. **The plans should clearly show the ordinary high-water line, mapped top of bank, and the Greenway Setback** within the vicinity of the work area. The top of bank can be determined by referencing either the top of bank definition found in Section 33.910, *Top of Bank* or the measurement protocol found in Section 33.930.150, *Measuring Top of Bank*. Please use the [Greenway Review Submittal Checklist](#) and [Environmental Review Submittal Checklist](#) as a guide in preparing site plans for your application.

- **Geotechnical Exploration:** Geotechnical exploration work (e.g., access installation, vegetation clearing, borings) is still subject to the regulations of the FP NRMP and may trigger an Environmental Review in and of itself unless exemptions found in Zoning Code Section 33.430.080.D.6 can be met. Based on information provided at the meeting, **it appears the exemption cannot be met and therefore the geotechnical exploration work, depending on its final scope, must be approved through a Type II or Type III review procedure.**

#### Other City Titles:

- Title 11 requires that for development on City owned or managed sites, applicants consult with the City Forester at the preliminary project design phase if City or Street tree removal is likely to occur to complete the project (11.50.040.C.2). Applicants for a land use review must be through the 30% preliminary design and provide the tree inventory.

#### B. Land Use Reviews Required

The following table identifies land use reviews required for your project. Please refer to the identified code citations for additional information. Information and handouts on [land use reviews](https://www.portlandoregon.gov/bds/37424) are available at <https://www.portlandoregon.gov/bds/37424>.

This project will trigger three separate reviews as noted below. To ensure continuity, all reviews will be processed concurrently through one Type III review procedure.

Review Procedure	Land Use Review	Approval Criteria
Type II	Greenway Review	33.440.350.A
Type III	Environmental Review	Forest Park NRMP, Exception to the Plan (p.217) / 33.563.210
Type III	Conditional Use Review	33.815.230.A-B

#### C. Previous Land Use Reviews.

As part of your application, address relevant conditions of approval from previous land use reviews on the site and discuss the status of compliance. Below are relevant land use case reviews that the City of Portland has on record for the subject site:

1. LUR 71-002944 (CU 076-71): Approval of a Conditional Use for diking and filling within the Willamette River and Multnomah Channel.
2. LUR 73-002629 (CU 066-73): Approval of a Conditional Use to install turbine powered generators.
3. LUR 86-005301 (GP 003-86): Approval of a Greenway permit for stockpiling at PGE's Harborton site.
4. LU 04-008697 EN GW: Approval of an Environmental Review and Greenway Review for a proposal to excavate a portion of the Olympic Pipeline for inspection and to install a temporary access route to the pipeline through a hardwood wetland forest.
5. LU 16-239742 GW: Approval of Greenway Review for tree removal and herbicide application associated with site preparation for habitat restoration.
6. LU 16-259062 GW: Approval of Greenway Review for construction of the following: Installation of cement deep soil mix soil stabilization, to address soil liquefaction within the substation area; construction of a new power substation within a smaller development footprint in the west corner of the current PGE Substation facility; excavation of approximately 560 cubic yards of soil from the man-made levee area; and construction of new stormwater facilities.
7. LU 18-151725 GW: Approval of a Greenway Review for a habitat restoration project at the Harborton



Substation site.

8. LU 21-040550 RP: Approval of a replat to create 2 parcels from the existing historic lots of record within the site.

#### D. Neighborhood Notification

When you apply for a Type III Land Use Review, all property owners within 400 feet, and all neighborhood associations and recognized organizations within 1,000 feet of your site will receive notification of your proposal.

- The site is located within the neighborhood association of Forest Park, contact Jerry Grossnickle at [landuse@forestparkneighbors.org](mailto:landuse@forestparkneighbors.org) & Linnton, contact Sarah Taylor at [sarahsojourner@mac.com](mailto:sarahsojourner@mac.com)
- The site is located within the district neighborhood coalition of Neighbors West/Northwest, contact at [admin@nwnw.org](mailto:admin@nwnw.org)
- Contact information for neighborhood associations, neighborhood district coalitions, and business associations is available at [www.portlandonline.com/oni/search/](http://www.portlandonline.com/oni/search/).

#### E. Submittal Requirements for Land Use

This list identifies the materials you must submit for your application to be considered complete.

	Item to submit	Details
1.	<b>Completed application form</b>	<a href="#">Application Form</a> available at:  <a href="https://www.portland.gov/sites/default/files/2019-03/land_use_review_application.pdf">https://www.portland.gov/sites/default/files/2019-03/land_use_review_application.pdf</a>
2.	<b>Fee</b>	<a href="#">Land Use Review fees</a> online at:  <a href="https://www.portland.gov/sites/default/files/2021/2021-07-01-bds-final-fee-schedules-land-use_0.pdf">https://www.portland.gov/sites/default/files/2021/2021-07-01-bds-final-fee-schedules-land-use_0.pdf</a>
3.	<b>Requirements for written narrative, maps, plans, etc.</b>	<a href="#">General Submittal Requirements (Zoning Code Chapter 33.730.060)</a> accessible online at:  <a href="https://www.portland.gov/sites/default/files/code/730-qj-procd.pdf">https://www.portland.gov/sites/default/files/code/730-qj-procd.pdf</a>
4.	<a href="#">Optional: Request for an Evidentiary Hearing and Waiver of Right to a Decision within 120 Days</a>	Allows new facts and evidence (an “evidentiary hearing”) to be presented if your project is appealed to City Council. You must submit the request form within 21 days of submitting your land use review application.  The 120-day waiver can be accessed at:  <a href="https://www.portland.gov/sites/default/files/2021/waiver_within_120days_041421.pdf">https://www.portland.gov/sites/default/files/2021/waiver_within_120days_041421.pdf</a>

#### To submit Land Use Reviews and other LUS applications:

When you are ready to submit a land use review application, please see the BDS Website for current submittal requirements [Apply for Land Use Reviews and Final Plat Applications | Portland.gov](#). Currently, we are accepting electronic land use applications via email at [LandUseIntake@portlandoregon.gov](mailto:LandUseIntake@portlandoregon.gov). A Land Use Services technician will contact you with instructions for providing payment for emailed applications.

#### To submit Permits:

When you are ready to submit a permit, please see our website for updated information on how to apply for permits: [Apply or Pay for a Building or Trade Permit | Portland.gov](#)



1900 SW Fourth Ave., Suite 5000 Portland, OR 97201 503-823-5185  
Fax 503-823-7576 TTY 503-823-6868 [www.portlandoregon.gov/transportation](http://www.portlandoregon.gov/transportation)  
Jo Ann Hardesty Commissioner Chris Warner Director

## PBOT – Development Review

### Pre-Application Conference Appointment Response

**Date:** June 9, 2022  
**To:** Chip Bloomer, PGE  
503-464-7109, [chip.bloomer@pgn.com](mailto:chip.bloomer@pgn.com)  
**From:** Tammy Boren-King, PBOT Development Review  
503-823-2948, [Tammy.Boren-King@portlandoregon.gov](mailto:Tammy.Boren-King@portlandoregon.gov)  
**Case File:** EA 22-142445  
**Location:**  
**R#:** R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044  
**Proposal:** A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

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Portland Transportation/Development Review staff has reviewed the pre-application conference materials to identify potential issues and requirements.

#### A. KEY ISSUES AND REQUIREMENTS

1. There are no transportation related approval criteria for an environmental review or a greenway review.
2. Based on the BDS response, a conditional use review will be triggered. The approval criteria include 33.815.230, which includes the following transportation related approval criteria:

B. The rail line or utility corridor will not substantially impact the existing or planned street system, or traffic, transit, pedestrian, and bicycle movement and safety

Please provide a narrative responding to each evaluation factor. PBOT staff is willing to allow the applicant team to decide if they hire a formal traffic consultant or not. If the proposed conditional use is challenged or opposed by neighbors or the area's neighborhood association, PBOT will not have any supporting documentation in the record to refer to other than the applicant's narrative. This is raised because of similar experiences in the past when other proposals were challenged or appealed. In those cases, applications were required to be placed on hold for information to be collected, prepared and submitted, or applications were fundamentally denied due to the lack of adequate and credible evidence in the

record. PBOT staff may be able to determine that the project will not result in detrimental impacts to the surrounding transportation system or immediate neighborhood, but the applicant is advised that if the decision on this project is appealed, the higher decision-making bodies have not (solely) relied upon PBOT's assessment and/or recommendation

3. The proposed utility transmission lines do not trigger either of the public improvement thresholds of 17.88.020. As such, dedication and public street or sidewalk improvements are not required. Please note the NW Marina Way frontage of the substation property was improved through public works permit TB0053 EP 355 (17-137318-WT).
4. It does not appear any work is planned within a City of Portland right-of-way. Highway 30 is an ODOT facility. Please coordinate with ODOT. Based on the conversation in the meeting, your team is already working with ODOT Region 2B.
5. From the submitted drawings it does not appear that any PBOT controlled public rights-of-way within Forest Park will need to be used during the construction. In most cases, work which will result in a City right-of-way being closed to the public requires the issuance of a Temporary Street Use Permit (TSUP). Staff confirmed with Temporary Street Use Permitting staff that no TSUP permit is needed for rights-of-way within the boundaries of Forest Park. There is a formal agreement in place which gives authority for access management to the Parks Bureau. The Parks Bureau non-park use permit will be the mechanism for permitting the temporary closures of these rights-of-way for maintenance and construction staging.



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Suite 613, Portland, Oregon 97204 ■ Mingus Mapps, Commissioner ■ Michael Jordan, Director

## Pre-Application Conference Response

**Date:** June 9, 2022

**To:** Matt Wickstrom, Conference Facilitator  
503-865-6513, Matt.Wickstrom@portlandoregon.gov

**From:** Ella Indarta, BES Systems Development  
503-823-2073, Ella.Indarta@portlandoregon.gov  
Marc Peters, BES Watershed Review

**Case File:** EA 22-142445

**R#:** R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044

**Proposal:** A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

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The Bureau of Environmental Services (BES) has reviewed the submitted materials to identify potential issues and requirements and provide the following comments. Some references to Portland City Code (PCC) are included below; the applicant may refer to the Auditor's Office [Online Charter and Code](#).

### A. KEY ISSUES AND REQUIREMENTS

Following is a brief summary of issues and requirements that may impact your proposed project or are submittal requirements that will require time to prepare prior to submittal of the application.

1. The applicant must submit a stormwater report with the land use and building permit applications if stormwater management requirements are triggered.
2. There may be existing drainageways located on this site. A minimum 30-foot-wide private drainage reserve will be required, located on-center over the drainageway.

### B. SANITARY SERVICE

1. *Sanitary Infrastructure:* According to available GIS data, the following sewer infrastructure is located in the vicinity of the project site:
  - a. There are no public sanitary sewers available to the subject site and the proposal does not appear to include new connections to the public sewer.

### C. STORMWATER MANAGEMENT

1. *Stormwater Infrastructure:* According to available GIS data, the following stormwater infrastructure is located in the vicinity of the project site:
  - a. There are no public storm-only sewers available to this property and a public storm main extension is not required.
  - b. There appear to be multiple drainageways in the project area. Additional information provided below.
2. *General Stormwater Management Requirements:* Development and redevelopment sites

that include any of the triggers listed in PCC 17.38.040 are subject to the policies and standards of PCC 17.38.035, Portland's [Stormwater Management Manual](#) (SWMM) and [Source Control Manual](#) (SCM). Projects must comply with the current adopted version of the SWMM as of the permit application date. A fundamental evaluation factor in the SWMM is the Stormwater Infiltration and Discharge Hierarchy (Section 1.3.3), which sets the framework that will be used to determine when a project's stormwater runoff must be infiltrated onsite and when offsite discharge will be permitted, and the parameters that must be met for either scenario. If tested infiltration rates on a property are greater than or equal to 2 inches per hour, onsite infiltration will be required unless the site qualifies for the ecoroof exception per Section 3.2.1 or infiltration is determined infeasible based on site conditions described in Chapter 2 of the SWMM. Note that maximum building coverage allowed by the zoning code, including below grade development, does not exempt the applicant from stormwater requirements. Pollution reduction and flow control requirements must be met using vegetated facilities to the maximum extent feasible, though roof runoff and some paved impervious surfaces are exempt when discharging directly to a UIC (refer to Sections 1.3.2, 1.3.4, 3.2.4 and 4.2.2 of the SWMM).

3. *Public Right-of-Way Stormwater Management:* Stormwater runoff from the public right-of-way must comply with all applicable standards of the SWMM and Sewer and Drainage Facilities Design Manual and be conveyed to a discharge point along a route of service approved by the BES Director or the Director's designee. Additional guidance on meeting the 2020 SWMM for projects in the public right-of-way is available at <https://www.portland.gov/bes/stormwater/swmm-and-right-way-projects>.
  - a. Based on the scope of PBOT requirements, no public stormwater management facilities are required because frontage improvements are not required. Note that if changes in the scope of the proposed development alter PBOT requirements for public improvements, then public stormwater management facilities that conform with the SWMM or payment of an Offsite Stormwater Management Fee may be required.
  - b. *SWMM Triggers:* Stormwater management requirements described in the SWMM are triggered for projects that develop or redevelop greater than 500 SF of impervious area. Pavement removal and replacement within an existing paved area will trigger stormwater management requirements only if soil (subgrade) is exposed or the pavement is replaced with a different material. Vertical additions to a structure within the existing building footprint will trigger the SWMM if the addition exceeds 10,000 SF. Stormwater management requirements are not triggered for re-roofing or repairs of an existing roof. Adding or modifying decking or paving material over an existing impervious surface does not trigger SWMM requirements. The applicant may refer to Section 1.2.1 of the SWMM and coordinate with BES staff for information on what qualifies as development and redevelopment for this project. If stormwater management requirements of the SWMM are triggered, a stormwater report will be required.

#### **D. GENERAL PUBLIC WORKS PERMIT INFORMATION**

*For questions related to the public improvements described throughout these notes, please contact Rod Krauter at (503) 823-7064 or [rodneyn.krauter@portlandoregon.gov](mailto:rodneyn.krauter@portlandoregon.gov) or the BES Development Engineering hotline at (503) 823-7761, option 3.*

1. *General Public Works Permit Information:* Information on the City's public works permit (PWP) process, including submittal requirements and review timelines, is available at [www.portlandoregon.gov/publicworks](http://www.portlandoregon.gov/publicworks). All submitted public works plans must meet the City's Sewer and Drainage Facilities Design Manual (SDFDM), SWMM, and public works permitting plan submittal requirements and drafting standards. Contact Public Works

Permitting at (503) 823-1987 or [pwp@portlandoregon.gov](mailto:pwp@portlandoregon.gov) with questions related to the general public works permit process.

2. *Hazardous Substances Code:* The City's Hazardous Substances Code (PCC 17.24.067) requires the excavation and removal of disturbed contaminated soils from right-of-way access areas and utility corridors. The soils must be replaced with clean fill at a minimum depth of 5 feet. A demarcation/contaminant barrier is also required when it has been determined the soils are contaminated at depth. Erosion control measures for contaminated soils (Section 8.2.1 of the SCM) must be met. Soil stockpiles must be covered and contained with a barrier on all four sides, with an impervious layer underneath the stockpile to inhibit contaminants from leaching back into the soil.

## E. SITE CONSIDERATIONS

The following information relates to specific site conditions or features that may impact the proposed project.

1. *Drainageway Protection:* City records indicate there may be drainageways throughout the subject site.
  - a. *Drainageway:* A drainageway is defined as a constructed or natural channel or depression that may at any time collect and convey water; it may be permanently or temporarily inundated. Depending on the capacity of the drainageway and size of the proposed development, the identified drainageway may serve as a disposal location for stormwater runoff from the project.
  - b. *Drainage Reserve:* Drainageways are protected by means of a drainage reserve except when the drainageway is adequately protected by an Environmental Protection overlay zone, another overlay zone that provides equivalent or better protection as determined by BES, or a tract (such as an Environmental Resource Tract) that equally or better meets the purpose of the drainage reserve, as determined by BES. Drainage reserves act as no-build areas and are intended to protect flow conveyance and water quality in both natural and constructed surface channels. Drainage reserves are typically delineated 15 feet from the centerline of the channel on both sides; however, a drainage reserve may be wider than 30 feet if needed to adequately protect the channel and bank. Required drainage reserve widths will be determined through site visits if/when this proposal moves forward through the development process or if the applicant requests a site visit. The applicant should refer to Chapter 5 of the SWMM for drainage reserve information and/or contact BES staff (identified above) for assistance.
  - c. *Documentation:* If the drainageway and associated drainage reserve/tract are located within 50 ft of the proposed temporary or permanent disturbance area, they must be shown on existing and proposed conditions site plans submitted with future land use and/or permit review application(s). If encroachments are proposed into the drainage reserve, BES may require a topographic survey of the drainageway. To help ensure long-term protection of drainage reserve areas, a notice about the drainage reserve must be recorded against the property deed through the applicable County recorder's office via a Notice of Drainage Reserve Form or an Operations and Maintenance (O&M) Plan and Form. The type of form required will depend on the impact to the drainage reserve; see Section 5.10 of the SWMM for more information.
2. *Drainageway Encroachment:* If proposed, encroachments into a drainage reserve must be reviewed by BES through the encroachment review process unless allowed outright per Section 5.5.1 of the SWMM. Proposed impacts and encroachment proposals will be reviewed to ensure that the flow rate, timing, and pattern of the drainage continues to be



adequately conveyed through the site and to protect water quality. There are two types of encroachments:

- a. **Drainage Reserve Buffer Encroachment:** An encroachment located within the outer 5 feet of a drainage reserve.
- b. **Drainage Reserve Channel Encroachment:** An encroachment located within 10 feet of the channel centerline. For drainage reserves with a total width other than 30 feet, the channel encroachment area will be determined on a case by case basis through the encroachment review process.

Refer to Section 5.5 for information related to encroachments, Section 5.6 for mitigation requirements, and Section 5.9 for drainage reserve submittal requirements. The applicant may also contact BES staff to discuss specific submittal items necessary for an encroachment, if proposed.

3. **Mature Trees:** Pursuant to the Environmental Zones chapter of PCC (33.430.250), the applicant must show that the proposed development will have the least possible detrimental impact on resources and/or functional values. The site contains mature trees which are beneficial because they intercept at least 30% of precipitation that falls on the canopy, filter stormwater, help prevent erosion, and provide shade which cools the air and stormwater runoff. Trees also increase property values and help support Portland's adaptation to climate change. It is difficult to mitigate for the removal of mature trees as it can take decades for new trees to provide equivalent benefits. BES recommends that future development at this site include measures to preserve as many of the site's existing trees as possible.
4. **Nesting Birds:** BES recommends that the applicant avoid disturbance (i.e. tree removal) between the primary nesting season: April 15 – July 31. If tree removal is necessary during this time, it is recommended that the applicant have the trees slated for removal surveyed for signs of nests. If an active nest is found (one with eggs or young), it is recommended that the applicant avoid removal until the young have fledged. Information on avoiding impacts on nesting birds can be found in BES's [Terrestrial Ecology Enhancement Strategy](#) guidance document. Additional information can be found in the City's [Resource Guide for Bird-friendly Building Design](#).
5. **Natural Resource Inventory:** Pursuant to the Environmental Zones chapter of PCC (33.430.250), the applicant must show the proposed development will have the least possible detrimental impact on resources and/or functional values. Pursuant to the Greenway Code, PCC 33.440.350, the applicant must show that the proposed development will have the least possible detrimental impact on water quality or the functional values of resource areas. Natural resources at this site were identified in the [City of Portland's Natural Resource Inventory](#), an inventory of locally significant riparian corridors and wildlife habitat. Specified resources and functions include the following:
  - a. **Regionally Significant Riparian Corridors:** Vegetated riparian corridors provide important natural watershed functions. Tree canopy shades streams, helping to keep streams cool. Riparian vegetation helps to stabilize stream banks, capture sediment in stormwater runoff, support the water cycle and the cycling of nutrients, and provide a source of woody materials to the streams.
    - 1) **Microclimate and Shade:** Riparian vegetation helps lower soil, air, and stream temperatures. Stream temperature influences in-stream processes and can be a critical factor for the health and survival of aquatic organisms.
    - 2) **Streamflow Moderation and Flood Storage:** Stormwater runoff can cause erosion and sedimentation in rivers and streams. Vegetation intercepts, absorbs and



stores rainfall before it reaches the stream channel. These areas can also help provide cool groundwater to streams during the dry season.

- 3) *Water Quality*: Riparian vegetation can filter, trap and store excess nutrients such as nitrogen and phosphorus found in fertilizers, and pollutants such herbicides and industrial chemicals that are carried in surface water.
  - 4) *Large Wood and Channel Dynamics*: Riparian areas contribute woody debris that help to form channel features and provide in-stream cover for fish. Large in-channel wood also controls the routing of water and sediment, dissipates stream energy, protects stream banks, stabilizes streambeds, helps retain organic matter, and acts as a surface for biological activity.
  - 5) *Organic Inputs and Food Web*: Forest ecosystems adjacent to stream corridors provide over 99 percent of the energy and carbon sources in aquatic food cycles.
  - 6) *Wildlife Movement Corridor*: Riparian vegetation provides wildlife movement corridors and migration routes, food and forage, nesting and breeding sites, and cover.
- b. *Regionally Significant Wildlife Habitat*: These resources provide important feeding, breeding and nesting habitat for native wildlife. The wildlife resources on this site provide the following functions and values:
- 1) *Habitat patch size*: Larger patches of undisturbed land provide critical habitat for aquatic and terrestrial species. These large patches provide greater opportunity for foraging, breeding, and rearing to a larger number and greater diversity of species. Small patches of land that are well-connected to other patches also provide important functions for wildlife.
  - 2) *Interior habitat area*: Large areas of habitat protect wildlife from excessive disturbance, while the edge effect of residential development negatively affects at-risk wildlife.
  - 3) *Connectivity*: As cities and neighborhoods grow, the areas animals need to survive become smaller and isolated. Connections between various aquatic and terrestrial habitat types (such as rivers, streams, wetlands, forests, and meadows) are important to the survival of many wildlife species.

To protect the natural functions provided by these resources, BES recommends that the applicant minimize site disturbance and replant disturbed areas with native vegetation. Doing so will help minimize erosion, protect slope stability, and restore lost functions.

6. *Slope Information*: This site is steeply sloped (>20%) located in a Landslide Hazard Area, and contains landslide deposits identified by DOGAMI; therefore, BES recommends that slope stability be carefully considered in all aspects of site development. This may include strategies such as replanting disturbed areas with native plants to help stabilize soils and minimize erosion, and placing stormwater facilities in areas that will protect slope stability.
7. *Soil Information*: Cascade silt loam soils predominate in this area. Cascade soils have an under layer (substratum) of dense silt loam (fragipan) that can restrict water flow. This type of soil is moderately- to poorly-drained and can become saturated during the rainy season, resulting in surface runoff, erosion, and landslides. To minimize these effects and to protect slope stability, BES recommends that native plants be planted on disturbed areas.

## **F. SUBMITTAL REQUIREMENTS FOR LAND USE**

1. Full land use plan set, including preliminary utility plan showing all existing and proposed sanitary and storm facilities and connections.
2. A stormwater report if stormwater management manual requirements are triggered.
3. The following information should be submitted either on a separate plan sheet or on an existing erosion control plan:
  - a. Location of drainageways, both natural and manmade. The limits of the identified drainageways must be clearly delineated.
  - b. Location of drainage reserve. The method that will be used to demarcate the drainageway on the property for onsite staff review should be described (i.e. flags, tape, fencing, etc.).
  - c. If applicable, describe location and type of proposed encroachment into, or modification of, the drainage reserve area or the drainageway itself.

#### **G. PERMIT INFORMATION**

At the time of permit review the applicant should be aware of the following:

1. *Connection Fees:* Sewage system connection fees and system development charges are assessed at the time of building plan review and change every fiscal year on July 1<sup>st</sup>. For additional information on these fees, navigate [here](#) or call the BES Development Review Team at 503-823-7761.
2. *Connection Requirements:* Connection to public sewers must meet the standards of the City of Portland's [Sewer and Drainage Facilities Design Manual](#).
3. *Drainageway Protection:* At the time of permit review, the applicant will be required to include on the plan set all onsite drainageways and associated drainage reserves or tracts. The applicant should refer to Chapter 5 of the SWMM for information related to drainageway protection requirements that will apply at the time of permit review.



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**  
FROM CONCEPT TO CONSTRUCTION

Dan Ryan, Commissioner  
Rebecca Esau, Director  
Phone: (503) 823-7300  
Fax: (503) 823-5630  
TTY: (503) 823-6868  
[www.portland.gov/bds](http://www.portland.gov/bds)

## Site Development

### Early Assistance Conference Response

**Date:** June 24, 2022

**To:** Matt Wickstrom, Conference Facilitator  
503-865-6513, [Matt.Wickstrom@portlandoregon.gov](mailto:Matt.Wickstrom@portlandoregon.gov)

**From:** Kevin Wells, 503-823-5618  
[Kevin.Wells@portlandoregon.gov](mailto:Kevin.Wells@portlandoregon.gov)

**Case File:** EA 22-142445

**Location:**

**R#:** R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044

**Proposal:** A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

The Site Development Section of the Bureau of Development Services (BDS) has reviewed the conference materials provided by the applicant. The following comments identify conditions that may impact the project, or submittal requirements for land use or building permit review.

#### A. Site Conditions

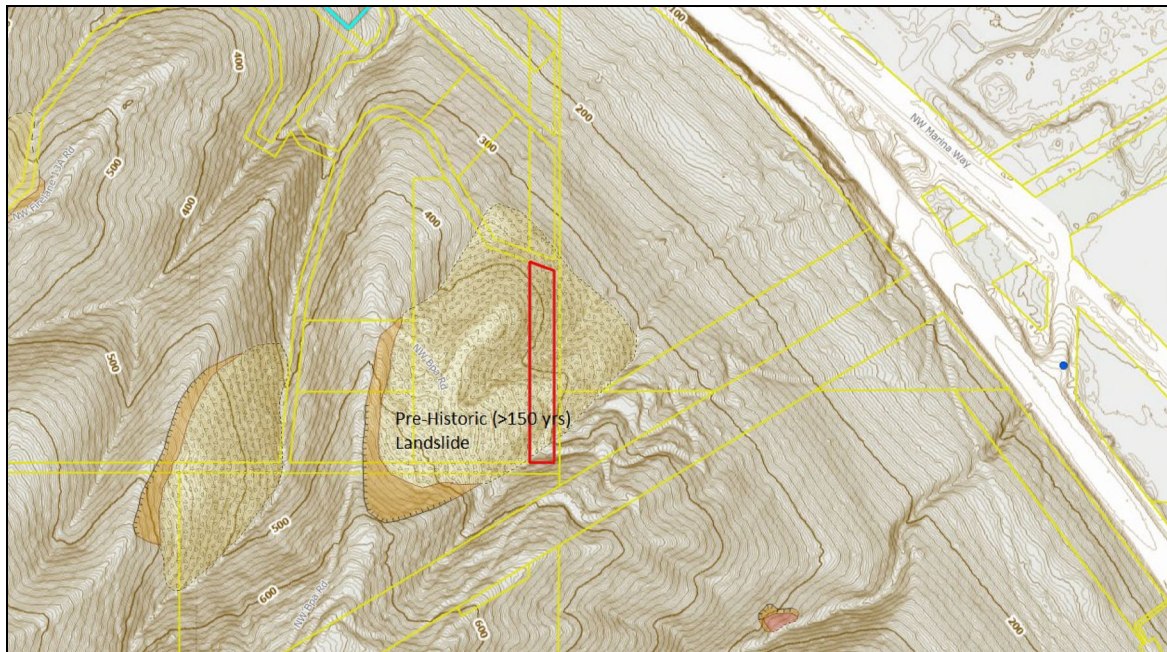
Topography: The site is steeply sloping.

Landslide Hazards: The site is in a mapped Landslide Hazard Area.

Flood Hazards: Existing drainages bisects the site that may qualify as unidentified watercourse flood zones.

#### B. Slope Hazards

The project is characterized by steeply sloping terrain that is susceptible to landslide activity. In addition, the project area encroaches over an existing pre-historic landslide as shown in the figure below. Site Development is concerned that the proposed clearing, grading, and tree removal will alter slope and groundwater conditions potentially impacting the stability of the existing slopes. Key hazards of concern include surficial slope instability, general slope instability, and debris flow failure (i.e. debris flows resulting from slope failures that are propelled into narrow drainages depositing onto Highway 30).



### C. Geotechnical and Slope Hazards Report

The applicant must provide a geotechnical report and slope hazards report with any building permit or land use application. The geotechnical report must be prepared by an Oregon-registered professional engineer with experience in geotechnical engineering. The geotechnical report must summarize the subsurface conditions, including groundwater, and provide the engineer's quantitative evaluation of existing and proposed slope stability conditions for both static and seismic cases. The engineer must also provide recommendations for clearing, grading, and slope hazard mitigation where the proposed work results in an unsuitable factor of safety against sliding.

Geologic hazards (slope hazards) should be evaluated by a geotechnical engineer and certified engineering geologist (CEG) to assess geomorphology, historic and pre-historic landslide activity, and groundwater factors that may aggravate slope instability. Guidelines for conducting slope hazard evaluations are presented on the City's website, which can be accessed [here](#). At a minimum, slope hazard investigations and reports must include:

1. A site reconnaissance conducted by a Certified Engineering Geologist where deep-seated pre-historic and historic landslides are required to be evaluated.
2. Subsurface investigations which extend below possible failure surfaces anticipated to have a factor of safety of less than 1.5 under static loading or 1.0 under seismic loading.
3. Investigation to determine the location of groundwater within the area of interest.
4. Strength testing of the soils of interest; either in-situ testing, laboratory testing, or both. Strength correlations for in-situ testing shall be well documented.
5. Geologic cross sections for the critical slope sections analyzed, including assumed piezometric surfaces.
6. Detailed descriptions of the analysis methods used and assumptions made in the numerical modeling.
7. Recommendations for temporary and permanent surface and subsurface drainage elements.



8. Discussion of the effects of on-site effluent disposal and stormwater disposal systems, existing or proposed, on slope stability.
9. Detailed laboratory testing results attached within a report appendix.
10. Detailed subsurface investigation results attached within a report appendix.
11. Geotechnical recommendations for site development, grading, and construction.
12. Recommendations for site development and mitigation measures required to achieve the minimum allowable factors of safety against slope instability.
13. Recommendations for temporary and permanent erosion control.
14. A statement of understanding of the performance criteria and expected displacements under seismic loading conditions.
15. A statement that the construction plans have been reviewed by the project Geotechnical Engineer or project Certified Engineering Geologist for conformance with the recommendations of the slope hazard evaluation and geotechnical engineering report. The date listed on the reviewed plans should be stated.

Note: In addition to the above criteria, the geotechnical engineer and engineering geologist must evaluate the impact of the proposed clearing, grading, and tree/shrub removal on slope stability.

Note: These above reports cannot be submitted after the proposed clearing is complete as requested by the applicant's team during the EA meeting.

#### **D. Unidentified Watercourse Flood Zones**

Unidentified Watercourse Flood Zones are regulated under [PCC Title 24.50.050](#) and may be present at the site (i.e. at the existing drainages traversing the site in an east-west direction). These watercourses, generally draining one acre or more, are not identified in a Federal Insurance Study and may not be identified on the Water Features map. The flood protection elevation shall be the base flood elevation plus two feet of freeboard. The width of the floodway shall not be less than 15 feet. The floodway boundary, flood fringe boundary, and flood protection elevation data shall be based upon watercourse geometry, slope, channel roughness, effect of obstructions, backwater and other factors which affect flood flow.

The requisite flood hazard data, maps, and sections shall be obtained and developed by procedures approved by the Sewage System Administrator. When appropriate and necessary data are available, the flood protection elevation and floodway and flooding fringe boundary data may be provided by the Sewage System Administrator. If pertinent hydrologic data and topographic data are not available, inaccurate, or outdated, and where substantial alterations or relocations of a watercourse are involved, the Sewage System Administrator may require the permit applicant to secure a registered engineer and surveyor to develop and supply the requisite flood hazard data, maps, and sections.

#### **E. Erosion Control**

Erosion prevention and sediment control requirements found in **Title 10** apply to both site preparation work and development. Full compliance with the erosion control requirements of Title 10, as well as maintenance of the erosion control elements, such as silt fences on private property, storm drain inlet protection and bio bags in the public right-of-way, is the responsibility of the property owner, the developer, and the builders. An erosion control plan must be submitted at the time of plan review. The project area meets the criteria specified in City Code 10.30.030 as a Special Site with additional requirements for erosion, sediment and pollution control. An erosion control plan prepared by a Certified

Professional in Erosion and Sediment Control (CPESC) or State of Oregon registered professional engineer, and special inspections by the CPESC or P.E. during construction, will be required at the time of building permit review. Please refer to the City of Portland Erosion and Sediment Control Manual for additional information regarding erosion and sediment control requirements.

DEQ permit required: The applicant is advised that a 1200-C permit from the Oregon Department of Environmental Quality is required for construction activities including clearing, grading, excavation, and stockpiling that will disturb one or more acres and may discharge to surface waters or conveyance systems leading to surface waters of the state, in addition to City requirements.

#### **F. Construction Management Plan**

If an environmental review is required, then Site Development will participate in the review of construction management plans. Tree protection, required limits of disturbance, preliminary erosion control measures, and mitigation areas should be shown on the construction management plan.

#### **G. Submittal Requirements for Land Use**

1. Site grading and clearing plan.
2. Geotechnical Report/Slope Hazard Report

# Water Bureau

## Early Assistance Appointment Response

**Date:** June 9, 2022

**From:** Benjamin Kersens, 503-865-6370, [Ben.Kersens@portlandoregon.gov](mailto:Ben.Kersens@portlandoregon.gov)

**Case File:** EA 22-142445

**Property ID:** R175902, R175903, R175905, R175906, R325471, R325472, R325475, R504044

**Proposal:** A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

The Portland Water Bureau (PWB) has reviewed the early assistance materials to identify potential issues and requirements.

### A. WATER AVAILABILITY

1. Water is available to this site from the 8" CI water main in NW Marina and the 12" DI main in Hwy 30. The mains are located on the east side of the respective roadways. The static water pressure is estimated as 67 - 83 psi at 37 feet in elevation.
  - a. Crossing of these mains may necessitate utility protection plans prior to construction. Refer to the [Portland Guidelines for Utility Protection](#) for more information.
2. There does not appear to be Water Bureau assets west of Hwy 30 in the vicinity of the proposed work area.
3. The site at 12500 NW Marina is currently served through a 1" meter and service and 8" fireline. Service line and meter size requirements are determined by the total fixture units being served by that line and meter. Submission of the fixture count is required at permit application if there are changes to the supplied fixture count. Please refer to the [W3](#) and [W4](#) forms on our website for more information.

If the services are found to be inadequate, they will be resized at the expense of the applicant. If an existing service is not used for the new development, it must be removed. All fees to remove services are the responsibility of the applicant.

### B. OTHER CATEGORY

1. Backflow prevention assemblies are required for all dedicated irrigation services, dedicated fire lines, mixed-use/multi-tenant developments, certain occupancies, and meters larger than 1.5". A backflow assembly may be required on smaller services based on the use of the property. Dedicated fire sprinkler water services are to be equipped with a state-approved detector style backflow prevention assembly.

Please contact us for translation or interpretation, or for accommodations for people with disabilities.

More information · Más información · Thêm thông tin · 欲了解更多信息 · Дополнительная информация

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[www.portlandoregon.gov/water/access](http://www.portlandoregon.gov/water/access) · 503-823-7432 (TTY: 503-823-6868, Relay: 711)

Backflow prevention assemblies can significantly impact property frontage development. Water Bureau required backflow assembly installations are required on private property, at the public right of way line, centered on the city's water service. Some installations are required to be installed above finished grade in an approved insulated outdoor enclosure. Assemblies installed inside of buildings must be approved prior to installation. Water services to high rise buildings (measured 75-feet from lowest finished floor to top of structure) are required to be equipped with Reduced Pressure type backflow assemblies.

Please reference possible backflow assembly requirements for your project at <https://www.portland.gov/water/backflow-prevention/backflow-assembly-installation-requirements> or contact Water Quality Inspection at 503-823-7479 for more information.

2. To obtain fire flow information fill out a "Fire Flow Request Form" found at our website, <https://www.portland.gov/water/water-development-services/request-fire-flow-information> or by calling 503-823-1408.
3. If there is contamination in or near the ROW at the location of proposed water mains or services, PWB requires:
  - a. Verification of clean soils at the location of the installations; or
  - b. Identification of the extent and degree of contamination such that appropriate remediation plans can be generated prior to any PWB construction. The remediation, disposal fees, and charges are the responsibility of the applicant.
4. A water main relocation may be required where new or reconstructed infrastructure is proposed to encroach on an existing water line.

## C. WATER CODE REQUIREMENTS

### Separate Water Service Requirements for Commercial Development

The Portland Water Bureau's guiding code, [Title 21](#) was updated in January 2021. The most significant changes include:

- As of July 1, 2021, **new mixed-use structures** are required to have separate meters for the commercial and residential portions of the development. This will better serve the different rate structure and assessment needs of commercial vs. residential accounts.
  - **Existing mixed-use structures, and those converted to mixed-use**, are not affected. Separate services for all tenant and dwelling spaces are encouraged and may benefit the property but are not required.
- As of July 1, 2021, **new commercial development with no residential use, and having permanent irrigated areas of 1,000 square feet or more**, are required to have a separate water meter for irrigation use. The requirement only applies to permanent irrigation services intended to remain longer than 24 months. This will separate irrigation from essential domestic water uses.
- Although not new, it is clarified that separate services and meters are required for **development on an individual lot, regardless of lot ownership**. An exception is when a single structure crosses a property line, in which case a single meter may serve the structure.



Topic	Code and Comments	Code Citation & Link
Title 21	City Water Code	<a href="#">Title 21 Water</a>

#### D. PERMIT INFORMATION

At the time of permit review (following the land use review) you should be aware of the following:

1. All new domestic service taps and upsized meters will be assessed a **[System Development Charge](#)** (SDC). Fee is based on meter size except when a header service is installed, in which case the fee is based on the shared meter equivalent. See PWB Code Guide for more information: <https://www.portland.gov/water/water-development-services/separate-meter/> Meters will be sized during the building permit process. Sizing is based on total count of all fixtures supplied by the identified service. Applicant will provide an SDC Form, W-3, or W-4 for each meter as part of the building permit submittal. There will be no reduction in meter size based on grey water usage or the installation of low-flow fixtures. SDC credit will be given for meters that are permanently removed. SDC credit is applied towards services within the same lot and is not transferrable.
2. Fire lines are excluded from Systems Development Charges.
3. The applicant can consider the use of a combination domestic and fire service for domestic services of 2" or less.
4. Service/Mains work may fall outside of our Rate Ordinance requiring a Site Specific estimate. Ordinance rates for service installations and water main extensions can be found in Exhibit A of the current Water Fee Schedule: <https://www.portland.gov/water/water-development-services/water-development-fees/>.



# Urban Forestry

## Early Assistance Response

Date: June 09, 2022  
From: Mariano Masolo  
503-823-4560, [Mariano.Masolo@portlandoregon.gov](mailto:Mariano.Masolo@portlandoregon.gov)  
Case File: EA 22-142445  
Location:  
Proposal: A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

Portland Parks, Urban Forestry staff has reviewed the Early Assistance materials to identify potential issues and requirements in accordance with Title 11, Trees. This response identifies potential issues and/or impacts on existing street and heritage trees, and trees on city-owned or managed sites, if applicable. Trees on private property are subject to development standards from the Bureau of Development Services. See planner requirements for private property trees.

**Please note that there may be other applicable tree requirements in Title 33 Planning & Zoning.**

### A. Response Summary

The development will be subject to Urban Forestry standards and requirements during the permit review process as detailed below.

- Trees in the environmental zone(s) are subject to environmental review through land use.
- Trees in the ODOT right-of-way are exempt from Urban Forestry requirements.
- Trees on Portland Parks properties are subject to further review through the NPUPs (Non-Park Use Services).

### B. Tree Plan (11.50.060)

A tree plan must be submitted with each phase of review including land use reviews, building permit applications, and public works permits. The plan must include the following information for street trees and trees on city owned property:

- a. The size and location of street trees adjacent to the subject property, and trees on site if on city owned property.
- b. Trees proposed to be preserved including tree protection specifications in accordance with 11.60.030.
- c. Tree(s) proposed for removal.
- d. Tree planting plan (tree species and location(s)).



1. *Street Tree Planting* (11.50.060.C)

Street tree planting may be exempt under 11.50.060.B when existing above or below grade utilities prevent planting street trees or when the existing planting strip is less than 3-feet wide.

Due to the existing condition of the right-of-way, street trees may not be required unless PBOT requires frontage improvements.

**C. On Site Trees**

*City Managed Sites (11.50.040.C.2.a)*

For development on City owned or managed sites, applicants are required to consult with the City Forester at the preliminary project design phase if City or Street Tree removal is likely to occur to complete the project. The purpose of this consultation is to identify potential impacts and opportunities to retain existing trees, as well as any measures required to protect trees on site, on adjacent sites, or in the street.

To meet this requirement, you must go through a review with Urban Forestry. A Preliminary Project Design Form must be submitted early in the design process (prior to 30% plan completion).

The Preliminary Design Form can be found here: <https://www.portlandoregon.gov/trees/article/513293>

1. *Existing On-Site Conditions*

Variety of trees on the area that may be impacted by the proposed rerouting transmission lines.

2. *On-Site Tree Preservation* (11.50.040)

City trees can be approved for removal if necessary to facilitate development. This project will have trees approved for removal through review other than a standard Urban Forestry permit. After the Land Use is complete and exemptions are considered, any remaining trees that still require a permit will be covered by an Urban Forestry permit.

3. *On-Site Tree Protection Specifications* (11.60.030)

4. Tree protection is required in accordance with Title 11 Trees, Protection Methods (11.60.030). Tree protection shall follow either the Prescriptive or Performance path. Protection methods must be shown on the tree plan. If using the Performance path, the alternate tree protection plan must be prepared by an arborist who has visited the site.

5. *On-Site Tree Density Standards* (11.50.050.D)

The applicant has not provided a conceptual tree planting plan.

**Tree Replacement for Development on City Owned or Managed Sites**

Size of tree to be removed (inches in diameter)	Number of trees to be planted
6 and up to 12	Up to 2



More than 12 and up to 20	Up to 3
More than 20 and up to 25	Up to 5
More than 25	Up to 6

### Street Tree Planting Standards (11.50.050)

One street tree shall be planted or retained for each full increment of 25 linear feet per side of street frontage. Planting is exempt when existing above or below grade utilities prevent planting of street trees, or if the existing design of the street will not accommodate street tree planting because the planting strip is less than 3 feet wide, there is not a planting strip, or there is insufficient space to add tree wells. Trees planted to meet street tree planting standards are credited toward mitigation requirements when street improvements are to partially or fully unimproved streets. When the required number of trees cannot be planted, a fee in lieu of planting will be required, in accordance with Table 60-1, below.

**Table 60-1 Broadleaf Tree Size Requirements**

Development Type	Tree Size	
	On Site	Street
One and Two Family Residential	1.5"	1.5"
Multi Dwelling Residential	1.5"	2"
All others	1.5"	2.5"

### Tree Planting Specifications

If there are fewer than 8 required trees, they may all be the same species. If there are between 8 and 24 required trees, no more than 40 percent can be of one species. If there are more than 24 required trees, no more than 24 percent can be of one species. Street tree species shall conform to the appropriate "City of Portland Approved Street Tree Planting List." The City Forester may approve or require an alternate or unlisted species.

All required street trees shall be planted in-ground following Standard Drawing Number P-581 "Typical Street Tree installation," except when in raised planters that are used to meet Bureau of Environmental Services storm water management requirements. Please include the Standard Drawing Number P-581 as part of the Public Works permit application. Plant materials shall be installed to current nursery industry standards and proper arboricultural practices [American National Standards Institute, *ANSI A300 Part 6: Tree, Shrub, and Other Woody Plant Maintenance-Standard Practices (Planting and Transplanting)* 2012, Tree Care Industry Association, Inc. Londonderry, NH]. Plant materials shall be properly supported to ensure survival.

All trees required or approved to be planted by Title 11 shall be planted or payment in lieu of planting made prior to the expiration of the permit or City's final acceptance of the project, as applicable. However, it is encouraged that planting occur during the wet months or as per City Forester



recommendations. Street tree planting may be deferred between May 1 and September 30 upon filing a performance guarantee as provided in Section 11.10.060 or other assurance deemed acceptable by the City Forester or BDS Director as applicable.

#### Tree Protection Specifications (11.60.030)

Trees to be retained shall be protected in accordance with Title 11 Trees, Protection Specifications (11.60.030.C). Tree protection shall be shown on the tree plan and include the distance from the trunk of the tree to the fence. A standard root protection zone is established as follows; a minimum of 1 foot radius (measured horizontally away from the face of the tree trunk) for each inch of tree diameter. Protection fencing shall be a minimum 6-foot high metal chain link construction fence, secured with 8-foot metal posts established at the edge of the root protection zone and permissible encroachment area.





# Parks and Trails Planning

## Early Assistance Response

Date: June 24, 2022  
From: Laura Lehman  
971-930-0104, [Laura.Lehman@portlandoregon.gov](mailto:Laura.Lehman@portlandoregon.gov)  
Marshall Johnson  
503-310-0223, [Marshall.Johnson@portlandoregon.gov](mailto:Marshall.Johnson@portlandoregon.gov)  
Case File: EA 22-142445  
Location: 12500 NW Marina Way and PGE Utility Corridor  
Proposal: A Pre-Application Conference to discuss rerouting transmission lines to the recently constructed Harborton substation. The project will install new steel monopoles, foundations and overhead wires within PGEs existing easement and requires clearing trees and shrubs within a 6 acre area located in the Environmental Protection and Conservation overlay zones.

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Portland Parks and Recreation (PP&R) Planning staff has reviewed the Early Assistance materials to identify potential issues and impacts to Forest Park, which would be significantly impacted by the proposed project. This response identifies potential issues that must be addressed in order for the project to move forward.

**Please note that these comments are based on the submitted preliminary materials, and may change as the project design evolves.**

### A. Response Summary

Based on the materials submitted, the applicant is proposing to clear approximately six acres of intact forest in the North Management Unit of Forest Park in order to construct new transmission lines. In addition, an adjacent approximately three-acre utility corridor in the Park that is vegetated with a dense mix of native shrubs and other vegetation would be cleared to upgrade existing transmission lines. This is a total of approximately 9 acres of disturbance. Several new tower structures and lines would be constructed in the Park, along with associated access roads. The forested portion of the site is a high-quality stratified forest habitat containing a multi-channeled stream system - conditions that are of the most highly valued resource and functional values in the City. The adjacent existing powerline corridor also contributes significant high quality plant and wildlife habitat values that are an important part of Forest Park. This work requires an approved land use review from the Bureau of Development Services as well as a Non-Park Use Permit (NPUP) issued by PP&R. Both the land use review process and the NPUP review process will evaluate the project for consistency with the Forest Park Natural Resources Management Plan (NRMP). This level of impact is not consistent with the NRMP, and does not meet the approval criteria for projects requiring an exception to the NRMP.

### B. Natural Resources in the Project Area



The approximately six-acre forested section of the site consists of a stratified mixed conifer and deciduous forest dominated by mature Doug fir and big leaf maple, with a lesser component of cedar, hemlock, alder and other species. There is a dense mid-story and shrub layer composed of younger trees, vine maple, salmonberry, hazelnut, salal, Oregon grape, and other common native shrub species (see photo 0724). There is also an intact native ground cover layer composed of sword fern, trillium, waterleaf, candy flower, trailing blackberry, bedstraw, piggyback plant, sedges and other species (see 0760 and 0794). There minimal presence of invasive weed species in the forested site, with most invasives appearing around the forest edges from the existing powerline corridors.

The approximately three-acre portion of the subject site where there is an existing PGE powerline is a dense mix of native and non-native shrubs and forbs and dispersed trees (see photo 0711). There are many species in this area, such as blackberry, thimbleberry, Scotch broom, salal, sword fern, various native and non-native grasses, thistles, and other forbs. Many of the plant species in this corridor support pollinators and other wildlife, complimenting a large-scale pollinator habitat restoration project underway in the adjacent BPA corridors.

A small stream with multiple connected channels runs through the length of the forested site. It appears to be an intermittent headwater stream system that flows down from Forest Park to connect to the Willamette River. The Lower Willamette River supports multiple federally listed species of salmonids. The tributaries flowing from forested headwaters in Forest Park help support water quality of the lower Willamette River and should be prioritized for protection. In addition, USDA NRCS soil survey mapping indicates soil map units with predominately hydric soils and soil map units with hydric soil inclusions. A wetland and waters determination/delineation should be completed to determine the precise locations of jurisdictional wetlands and waters within the project area.

Use of the forested site by a variety of wildlife is apparent, including pileated woodpecker foraging holes in trees, which is indicative of mature forests (see photo 0777). The forested areas of Forest Park such as this subject site support populations of Northern red-legged frogs, listed as a Federal Species of Concern and a State Sensitive Species.

Many species of birds, including bald eagles use this site for habitat. Bald eagle nesting activity has been documented in Forest Park near the subject site. City of Portland policies promote conservation of birds and other wildlife and virtually all native bird nests are protected by federal law (Migratory Bird Treaty Act).

Soils appear uncompacted and healthy in most of the forested site, evident in the abundant and diverse native ground cover. Many areas of the site are very steep, with grades over 30%. Portions of the existing access roads are in poor condition with steep slopes, ruts and failing drainage systems (see 0687 and 0688). Activities that could damage access roads used for emergency access and property management, or could increase the potential for geologic instability and soil erosion in the near and long term are a significant concern for PP&R.

### **C. Consistency with the Forest Park NRMP**

As proposed, the project is not consistent with the Forest Park NRMP. The NRMP was adopted by Portland City Council in February 1995, and contains the procedures and criteria for approving projects within the Plan area. In order to be approved, the proposal must be consistent with all of the stated approval criteria, which are addressed below. Because this proposal consists of new facilities requiring above-ground structures, and would disturb more than 10,000 square feet of soil and vegetation, this proposal must meet the approval criteria for Exception to the Plan laid out in Chapter 8, Section B of the Plan.



- **The proposal meets all the criteria for minor amendments to the plan.**

All of these criteria must be met by the proposal. Criteria A and B of the criteria for minor amendments are critically important for this proposal, and are not met based on the submitted materials. Criteria A requires that there be a demonstrated need for the proposal. The submitted materials do not provide enough information about the need for this project to meet this requirement. Applications for this work must include more detailed information about the need for the project, including why an alternative is not feasible. The application states the purpose of the project is to create redundancy – please provide more information about whether PGE is required to provide redundancy in the corridor.

Criteria B states that the project must be consistent with the goals and strategies of the NRMP. The current proposal is not consistent with the conservation goals of the NRMP. The Plan includes two conservation goals:

*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.*

*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.*

The NRMP states that the North Management Unit of the Park, where the project is proposed, is where natural resources are of highest quality and highest priority for protection. The forested portion of the site is a high-quality stratified forest habitat containing a multi-channeled stream system - conditions that are of the most highly valued resource and functional values in the City. The adjacent existing powerline corridor also contributes significant high-quality plant and wildlife habitat values that are an important part of Forest Park. Oregon white oak habitat exists on and around the site. Protection of this habitat type is a priority and impacts to it should be avoided. There is also a stream on the site where forest clearing and new infrastructure is proposed. Waterways, including headwater streams, intermittent streams, wetlands or seeps should not be impacted. The removal of such a large amount of vegetation will remove habitat of the type that is not easily replaced through mitigation, which in turn will impact the animals that rely on that habitat to survive. The clearing of vegetation around the stream will impact the temperature of the water and potentially other aspects of water quality.

This level of impact does not protect native plant and animal communities or water resources, as required by Goal 1. The proposed scope of work would remove Oregon white oak habitat, which would not maintain regional biodiversity. It would remove more than six acres of habitat for plants and animals that live in Forest Park, and it would not improve water quality or repair damaged and fragmented natural systems – to the contrary, it would increase fragmentation of the forest canopy and exacerbate the gap in the forest at this location. For those reasons, the proposal is not consistent with Goal 2.

When considering the impacts to the Park that would result from the proposed project, the following additional issues should be considered:





- Activity in Forest Park should follow City of Portland Bureau of Environmental Best Management Practices for Protecting Nesting Birds ([Avoiding Impacts on Nesting Birds | The City of Portland, Oregon \(portlandoregon.gov\)](https://www.portlandoregon.gov/bureauofenvironmentalbestmanagementpractices/118227)).
  - Bald eagle nesting activity has been observed in this area. The applicant should address compliance with USFWS and Bald and Golden Eagle Protection Act (BGEPA) for bald eagle nests that could be impacted.
  - Native plant communities, wildlife habitat and City resources are impacted by the introduction of invasive weeds from construction activities and disturbance. The proposal should include adequate measures to ensure the proposed action does not result in an increase in invasive species in the Park.
  - The tree canopy cover in the City is a valuable resource with far-reaching benefits. Avoiding loss of tree canopy is a priority that is reflected in the Forest Park NRMP and Environmental Zoning Code standards. Tree canopy cover is identified as an important measure of environmental health by the City of Portland. The amount of tree canopy cover in the City is a measure of Portland Parks & Recreation bureau-wide performance and is also cited as an important indicator in the Portland's Urban Forest Management Plan (2004), Urban Forest Action Plan (2007), Climate Action Plan (2015), and 2035 Comprehensive Plan (2016). Further, the February 2022 Tree Canopy Monitoring Report shows that over the most recent monitoring period, citywide tree canopy cover decreased for the first time since monitoring began. Canopy loss has far-reaching impacts to our city, including Removal of tree canopy should be minimized to the maximum extent possible.
- **The proposal is a park-related development, or no alternative locations exist outside of Forest Park for the proposal.**
  - **There are no practicable alternative locations within Forest Park suitable for the use in which the development will have less adverse impact on resource values.**

This proposal is not park-related development – therefore, the application must show that no alternative locations exist outside of Forest Park for the proposal, and that there are no practicable locations within Forest Park where the project would have less of an impact. The submitted materials do not include an alternatives analysis to show that this is the case. At the June 9, 2022 meeting, the project team indicated that an alternatives analysis has been completed – a robust alternatives analysis evaluating alternative locations for the project, including other locations within Forest Park, and showing that this project must be located at this location within Forest Park will be required at the time of application.
  - **Any long-term adverse impacts of the proposed action on resource values are fully mitigated within the Management Unit.**

A robust mitigation plan must be submitted with any proposal for work of this type. The applicant must identify the long-term impacts of the proposed action on resource values, and propose appropriate mitigation. Mitigation via in-lieu payment for removed trees will not be sufficient. Consider the impacts of the entire cleared corridor, not just the portion proposed as part of this project. Adding this area adjacent to the BPA corridor creates a very large total break in the forest canopy, in an area of pristine upland forest that provides habitat for birds including bald eagles. This area also includes a multi-channel stream and potential wetland areas. This scale of impact may be too large to successfully mitigate, given the value of the resources in the project area. The feasibility of sufficient mitigation should be a major consideration in the design of this project.



- **The proposal is consistent with the purpose of the Environmental Zones.**

*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.*

The purpose of the Environmental Zones is to protect resources and functional values within the areas where the zones are applied. Please refer to the discussion above of the impacts to resources and functional values that would occur were this project to move forward. These impacts must be addressed and reduced in order for this project to be consistent with this purpose.

#### **D. Utility Easement (Ordinance 132226)**

The proposed work is within an existing utility corridor easement established by City Ordinance 132226. The easement includes standards for vegetation management and fire prevention.

Section III of the easement states that the grantee is allowed to clear the easement in compliance with Exhibit A, to the end that the visual and ecological impact to the park is minimized. Any application for the proposed work should evaluate how the proposed project minimizes ecological and visual impacts to the Park.

Section XI of the easement states that Grantee will comply with local laws, making the proposed subject to compliance with Portland Zoning Code Title 33 and through it, the Forest Park NRMP. This section also requires the grantee to comply with state and federal laws.

#### **E. Fire Risk**

The applicant will be required to provide a Fire Management Plan for PP&R review and approval. If the project work is occurring outside of fire risk season, then the plan should be oriented to fuel reduction and leaving conditions post-construction in a condition that mitigates fire risk. If the project will be occurring during fire season, then the project must comply with PP&R fire management best practices and seasonal restrictions.





Attachment 1: Site Photos

Photo 0687





Photo 0688



Photo 0711





Photo 0724



Photo 0733





Photo 0739



Photo 0760





Photo 0777



Photo 0794



**22-142445 PC**  
**PGE Harborton Routing**  
**Sign-in Sheet**  
**June 9, 2022**

Tammy Boren-King, PBOT, [tammy.boren-king@portlandoregon.gov](mailto:tammy.boren-king@portlandoregon.gov), 503-823-2948

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Morgan Steele, BDS, Land Division/Environmental, [morgan.steele@portlandoregon.gov](mailto:morgan.steele@portlandoregon.gov), 503-865-6437

Amanda Rhoads, BDS, Title 33, [Amanda.rhoads@portlandoregon.gov](mailto:Amanda.rhoads@portlandoregon.gov), 503-865-6514

Ella Indarta, BES, [ella.indarta@portlandoregon.gov](mailto:ella.indarta@portlandoregon.gov), 503-823-2073

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Ben Kersens, Water, [ben.kersens@portlandoregon.gov](mailto:ben.kersens@portlandoregon.gov)

Laura Lehman, Portland Parks and Recreation, [laura.lehman@portlandoregon.gov](mailto:laura.lehman@portlandoregon.gov)

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Philip Krain, Construction Community Engagement Specialist, [Philip.krain@pgn.com](mailto:Philip.krain@pgn.com)





**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**  
FROM CONCEPT TO CONSTRUCTION

Carmen Rubio, Commissioner  
David Kuhnhausen, Interim Director  
Phone: (503) 823-7300  
TTY: 711  
[www.portland.gov/bds](http://www.portland.gov/bds)

**Date:** August 24, 2018  
**To:** Interested Person  
**From:** Stacey Castleberry, Land Use Services  
503-823-7586 / [Stacey.Castleberry@portlandoregon.gov](mailto:Stacey.Castleberry@portlandoregon.gov)

## **NOTICE OF A TYPE II DECISION ON A PROPOSAL IN YOUR NEIGHBORHOOD**

The Bureau of Development Services has approved a proposal in your neighborhood. The mailed copy of this document is only a summary of the decision. The reasons for the decision are included in the version located on the BDS website <http://www.portlandonline.com/bds/index.cfm?c=46429>. Click on the District Coalition then scroll to the relevant Neighborhood, and case number. If you disagree with the decision, you can appeal. Information on how to do so is included at the end of this decision.

### **CASE FILE NUMBER: LU 18-151725 GW**

#### **GENERAL INFORMATION**

**Owner/Applicant:** Portland General Electric | **Attn:** Jennifer Santhouse  
121 SW Salmon Street, 3WTC0406 | Portland, OR 97204-2901  
503-464-8121 | [Jennifer.Santhouse@pgn.com](mailto:Jennifer.Santhouse@pgn.com)

Portland General Electric | **Attn:** Mark Lindley  
121 SW Salmon Street, 3WTC0406 | Portland, OR 97204-2901  
503-464-8102 | [Mark.Lindley@pgn.com](mailto:Mark.Lindley@pgn.com)

**Site Address:** 12500 NW MARINA WAY  
**Legal Description:** TL 100 10.80 ACRES DEPT OF REVENUE, SECTION 34 2N 1W; TL 300 62.97 ACRES DEPT OF REVENUE, SECTION 34 2N 1W  
**Tax Account No.:** R971340100, R971340180  
**State ID No.:** 2N1W34 00100, 2N1W34 00300  
**Quarter Section:** 1717, 1718, 1817, 1818  
**Neighborhood:** Linnton, contact [chair@linntonna.org](mailto:chair@linntonna.org).  
**Business District:** None  
**District Coalition:** Neighbors West/Northwest, contact Mark Sieber at 503-823-4212.  
**Plan District:** None  
**Other Designations:** 100 Year Floodplain; Site 105 of the *Northwest Hills Natural Areas Protection Plan*; Sites 4.2a and 4.2b of the *Lower Willamette River Wildlife Habitat Inventory*; Site WR3-Harbor-ton Wetlands Inventory Site, of the 2009 *River Plan North Reach Recommended Draft Natural Resources Inventory*.

**Zoning:** Open Space (OS) base zone with River Natural (n) and River Water Quality (q) overlay zones. Heavy Industrial (IH) base zone with River General (g) and River Water Quality (q) overlay zones.

**Case Type:** GW - Greenway Review  
**Procedure:** Type II, an administrative decision with appeal to the Hearings Officer.

**Proposal:** Portland General Electric Company (PGE) (the applicant) requests Type II Greenway review and approval from the City of Portland (City) to construct the PGE Harborton

Restoration Project, a habitat restoration project at its Harborton PGE Substation (Property) along the Willamette River.

As a result of past and continued impacts to the Willamette River in the Portland Harbor, this project is needed to address the lack of available off-channel, fish-accessible aquatic habitat within the Harbor, thereby directly addressing one of the primary limiting factors for fish recovery within the lower Willamette River. The purpose of the PGE Harborton Restoration Project (Project) is to restore and improve seasonally available aquatic and riparian habitat for fish and wildlife and the project meets the City of Portland's definition of "Resource Enhancement."

Specifically, in association with the Portland Harbor Natural Resources Damage Assessment (NRDA) process, the proposed restoration is intended to restore and enhance habitat for species that were potentially injured by historical damages to the Portland Harbor (Harbor). In order to maximize the area available for restoration, the existing PGE pole yard is being removed and the existing PGE electrical substation and switch yard is being redesigned and consolidated to fit within a smaller footprint (this reconfiguration of the PGE substation is not part of the current land use review, and was approved by the City on January 17, 2018, under Greenway Review case number LU 16-259062 GW).

The PGE Harborton Restoration Project will restore tributary and off-channel habitats at its 74-acre Harborton Substation Property. The Property is located along the west bank of the Lower Willamette River at River Mile (RM) 3.3, where Multnomah Channel diverges from the mainstem Willamette River. The Property is identified as a high-value restoration opportunity in the City's 2009 *River Plan North Reach Recommended Draft* (COP 2009) and by the Portland Harbor Natural Resource Trustee Council's (Trustees or Trustee Council) Expert Panel, as part of the Trustees' *Ecological Restoration Portfolio* (Trustee Council 2012, 2012b). Development of this project will allow PGE to offset potential liability resulting from the Trustees' NRDA process.

Key elements of the Project include:

General Elements:

- In total, approximately 62 acres of the Property are proposed for resource enhancement, and 13 acres are proposed for continued use as an electrical substation.
- The restoration and enhancement work will involve earth-moving activities over 31.5 acres of the Property, providing access to off-channel habitat that will become available when Willamette River stage is greater than 10.5 feet elevation City of Portland Datum (CPD) and totaling approximately 28 acres of off-channel habitat at bankfull river stage.
- Control of invasive plant species found throughout the Property through removal, re-vegetation, and routine maintenance.
- Enhancement of shoreline, riparian, and upland habitats through native re-vegetation plantings and maintenance.

Southern Tributary Resource Enhancement (sub-area 1):

- Removal and upgrade of a failed culvert on the southern tributary that acts as a fish passage barrier and serves to disconnect the Willamette River from its historic floodplain.
- Additional enhancement of fish habitat and riparian habitat characteristics in and along the southern tributary through installation of large in-stream habitat wood and clean streambed substrate, invasive plant species control, and supplemental planting of native riparian and wetland vegetation.

Upland Habitat Creation (sub-area 2):

- The restoration design goals for Sub-Area 2 include a soils-placement berm between the substation and the Willamette River, management of invasive plant species, and enhancement of native vegetation through installation and maintenance of native plantings.
- Approximately 160,700 cubic yards of soil will be excavated from sub-Areas 1, 3 and 4, and placed in sub-area 2, resulting in a net removal of 113,000 cubic yards of soil from within the 100-year floodplain.

- Excavated soil will be placed on approximately 11 acres of the currently developed area (the east storage yard, PGE substation, former tank farm, and south unused area). Existing ground surface elevations for the storage areas range from 27 to 33 feet CPD. Proposed final grade elevations are between 27 to 50 feet CPD.

#### Northern Tributary Elements (sub-areas 3 and 4):

- Excavation of approximately 160,700 cubic yards of soil to establish a new stream channel and outlet connection to the Willamette River for the northern tributary, including floodplain and meandering channel. This will re-establish a hydraulic connection to the Willamette River and eliminate the existing partial fish passage barrier caused by berm construction. Historic fill will be removed and the new meandering channel will be constructed through Sub-Area 3 to a new confluence with the Willamette River.
- Enhancement of fish habitat and riparian habitat characteristics in and along the new northern tributary channel through installation of large in-stream habitat wood, invasive plant species control, and installation of native riparian and wetland vegetation.
- Preservation and enhancement of wetland area utilized by red-legged frogs, including placement of large woody material (LWM) to serve as haul-out and basking features

The site is within the City's Willamette Greenway overlay zones, and Zoning Code 33.440.310 requires Greenway review for exterior alteration to development, and changes to land including excavation and fills. The work must therefore be approved through a Greenway Review.

#### **Relevant Approval Criteria:**

In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant criteria are:

- Greenway Review Approval Criteria, Zoning Code Section 33.440.350; and
- *Willamette Greenway Design Guidelines*

## **ANALYSIS**

**Site and Vicinity:** The PGE Harborton property is a 74-acre site on the western bank of the Willamette River, just south of Sauvie Island and the Multnomah Channel. The property is located at 12500 NW Marina Way, Portland, Oregon and lies just inside the Portland city limits. The site is comprised of two contiguous parcels (Tax Lots 2N1W34-100 and 2N1W34-300) that PGE purchased between 1939 and 1975 (these two parcels are hereafter referred to as the "Property"). In addition, a maintenance access road, located southeast of the project Property, is located for part of its length on another parcel owned by PGE (Tax Lot 2N1W34-1000).

The Property is bounded to the northeast and northwest by the Willamette River and Multnomah Channel, respectively. Undeveloped property is located to the northwest, which is owned by Fred's Marina and is proposed as the Miller Creek NRDA restoration project. NW Marina Way borders the property to the southwest and beyond that is the Burlington Northern-Santa Fe (BNSF) rail line immediately adjacent to the road. A narrow vegetated buffer separates the rail line from Oregon Highway 30.

The southeastern Property boundary abuts a utility corridor owned by the Bonneville Power Administration (BPA). The utility corridor is for high voltage transmission lines. South of the BPA transmission corridor is a parcel owned by PGE for service access to the PGE transmission line that runs parallel to the BPA transmission lines. In November 1941, PGE and BPA entered into a Crossing Agreement to allow for reciprocal access between tax lots 300 (PGE), 900 (BPA) and 1000 (PGE) for the construction, operation and maintenance of electrical facilities. Further south of the utility corridor is the Knife River sand and gravel operation.

The PGE substation occupies approximately 21 acres of the site within the IH zone. Open yards, access drives, a railroad spur, and manmade levees dominate the substation area. Two of several towers supporting electrical cables across the Willamette River stand along the south property line of the site. The Olympic Pipeline runs through the northern portion of the site as well.

The remainder of the land consists of relatively undeveloped upland riparian forest, with forested wetlands. The site provides habitat to a variety of wildlife species, as noted in the *Lower Willamette River Wildlife Habitat Inventory* (LWRWHI) and the applicant's narrative (Exhibit A. 1). The northwestern-most 34 acres of the site was studied for the *Northwest Hills Natural Area Protection Plan* in 1986 and 1990. This plan identified seasonal creek, palustrine wetlands, wildlife habitat, and open space resources. The study noted that the area provides a year-round water source, food and cover to a variety of species, and has additional potential for off-channel rearing areas for coho salmon, cutthroat trout, and steelhead in the wetland areas. This area also supports a breeding population of red-legged frogs. In the LWRWHI, the shoreline was described as freshwater marsh with mud flats, supporting a variety of species.

The undeveloped portion of the Property is documented within the City's *River Plan North Reach, Recommended Draft 2009, Volume 3A: Natural Resources Inventory: Riparian Corridors and Wildlife Habitat* (COP 2009). This portion of the Property is described within Inventory Property WR3 (Harborton Wetlands), which includes the project area, surrounding properties, and river area. The report describes the Property as the largest remnant of black cottonwood-ash bottomland forest within the North Reach of the river within the City. It also identifies the undeveloped portion of the Property as providing important habitat connectivity for several species and notes it as the highest quality wildlife area in the North Reach due to the complexity of riparian/wetland habitat types (COP 2009). Relative to other properties evaluated by the report, Inventory Property WR3 was assigned a high relative rank for river, wetland, and forests/shrub habitats. The City's wildlife habitat model assigned a medium relative rank to the forested wetland areas. The forested wetlands are designated Special Habitat Areas by the City (COP 2009).

The Property includes Site Number 4.2A and 4.2D in Zone 4 of the *Lower Willamette River Wildlife Habitat Inventory* (BP 1986). The Bureau of Planning identified the undeveloped portion of the Property as a Rank 1 Site in the *Lower Willamette River Wildlife Habitat Inventory*, the highest ranking Site in the inventory. Rank 1 sites are:

"Those sites, which, if left unaltered, have an extremely significant combination of features which attract a diverse array of wildlife. The sites are essentially natural in character, although some disturbance (natural or human) exists in all of these sites." (BP 1986)

Multnomah Channel provides habitat and serves as a corridor for a variety of waterfowl and other wildlife species. Human use of the channel is also high, with several boat moorages, and marinas in the immediate vicinity, as well as recreational boaters and fishers. Moorage facilities with associated levees continue to the west of the site, and the south edge of Sauvie Island, across the channel from the site, has a system of levees and dikes along the channel shoreline.

According to the *Northwest Hills Natural Area Protection Plan*, the first Linnton Townsite may have also been located on this property.

Historical property alterations across the Property have resulted in distinct sub-areas that differ from one another in terms of their respective degree of alteration/disturbance and remaining habitats. To aid in the description of the Property, these sub-areas are informally referred to herein as Sub-Areas 1 through 4. The sub-areas were delineated by ecological characteristics and/or development features, which guided development of specific restoration actions within each sub-area. A detailed description of each sub-area is presented in the applicant's narrative (Exhibit A.1).

In brief, Sub-Area 1 is the southeast 300 feet of the Property covering approximately 8 acres. Sub-Area 1 includes an unnamed, cold-water stream flowing from a culvert under NW Marina Way and the BNSF rail line, northeast into the Willamette River. The stream is surrounded by wetlands that extend southeast beyond the Property boundary. The wetlands are dominated by reed canarygrass (*Phalaris arundinacea*) and patchy native tree canopy. Near its confluence with the Willamette River, the stream is impounded by a failed culvert under a service road providing access between the substation and the BPA transmission towers. Near the failed

culvert the stream flows through mature black cottonwood (*Populus balsamifera* var *trichocarpa*) riparian forest. While the canopy layer is mature, the understory is dominated (~69%) by invasive species [primarily reed canarygrass and Himalayan blackberry (*Rubus armeniacus*)].

Sub-Area 2 covers approximately 25 acres and extends another 700 feet northwest of Sub-Area 1. About 21 acres of Sub-area 2 are developed with existing PGE substation facilities (substation, switchyard, pole yard, etc.). Sub-Area 2 includes approximately 3 acres of river frontage composed of a berm constructed of fill material. The berm separates the developed portion of the Property (substation, switchyard, and pole yard) from the river.

Sub-Area 3 extends another 550 feet northwest of Sub-Area 2 and covers approximately 17.5 acres. The majority of Sub-Area 3 was bermed and partially filled with dredge spoils prior to 1986. Since then, the area has reverted to riparian shrub, scrub-shrub wetland, and herbaceous wetland habitat. Canopy cover is largely native species, but is patchy, consisting of isolated clumps of trees (<15% cover). Understory vegetation is dominated by invasive grasses (reed canarygrass) and shrubs.

Sub-Area 4 covers the northwest 24 acres of the Property and consists of historic floodplain, mixed riparian forest, mature Oregon ash-dominated upland forest, willow-dominated scrub-shrub wetland, and reed canarygrass-dominated herbaceous wetland habitats. Two wetlands are mapped within this sub-area, as well as an intermittent cold-water stream entering the Property from the Portland West Hills.

**Zoning:** The zoning designations on the site include IH and OS base zones, with the Greenway River Natural (n), Greenway River General (g), and Greenway River Water Quality (q) overlay zones.

The IH zone is one of the three zones that implement the Industrial Sanctuary map designation of the Comprehensive Plan. The zone provides areas where all kinds of industries may locate including those not desirable in other zones due to their objectionable impacts or appearance. The proposal is limited to resource enhancement and culvert replacement, and the development standards from this base zone do not apply and are not addressed in this report.

The Open Space base zone is intended to preserve and enhance public and private open, natural, and improved park and recreational areas identified in the Comprehensive Plan. These areas provide opportunities for outdoor recreation, provide contrasts to the built environment, preserve scenic qualities, protect sensitive or fragile environmental areas, enhance and protect the values and functions of trees and the urban forest, preserve the capacity and water quality of the stormwater drainage system, and provide pedestrian and bicycle transportation connections. The proposal is limited resource enhancement and culvert replacement, and the development standards from this base zone do not apply and are not addressed in this report.

The Greenway overlay zones are intended to protect, conserve, enhance, and maintain the natural, scenic, historical, economic, and recreational qualities of lands along Portland's rivers; establish criteria, standards, and procedures for the development of land, change of uses, and the intensification of uses within the greenway; and implement the City's Willamette Greenway responsibilities as required by ORS 390.310 to 390.368 and Metro's Title 3. The purpose of this land use review is to ensure compliance with the regulations of the Greenway overlay zones.

**Land Use History:** Approvals of quasi-judicial land use reviews run with the land and are transferred with ownership. Associated conditions or restrictions continue to apply. City records indicate that prior land use reviews have been conducted for this site. Prior land use reviews include the following:

**LU 71-002944:** Approval of Conditional Use review for diking and filling.

**LU 73-002628:** Approval for the operation of gas turbine power generators for a limited term ending in 1975.

**LU 86-005301:** Approval of Greenway Review related to stockpiling within the diked area.

**LU 04-008697 EN GW:** Approval of an Environmental Review and a Greenway Review for a proposal to excavate a portion of the Olympic Pipeline for inspection and to install a temporary access route to the pipeline through a hardwood wetland forest. As part of this case, BDS staff required mitigation in another location at the site due to concerns that mitigation planting near the pipeline would be overcome by invasive reed canarygrass and not survive.

Land use review LU 04-008697 EN GW included conditions of approval for installation of mitigation plantings as well as for 2 years of monitoring and maintaining those plantings.

**LU 16-239742 GW:** Approval of Greenway Review for tree removal and herbicide application associated with site preparation for habitat restoration. Included conditions for mitigation as indicated in LU 04-008697 EN GW, as well as additional planting requirements associated with this review and a two-year monitoring period.

**LU 16-259062 GW:** Approval of Greenway Review for installation of cement deep soil mix soil stabilization, to address soil liquefaction within the substation area; construction of a new power substation within a smaller development footprint in the west corner of the current PGE Substation facility; excavation of approximately 560 cubic yards of soil from the man-made levee area; and construction of new stormwater facilities.

The conditions of approval for LU 04-008697 EN GW, LU 16-239742 GW and LU 16-259062 GW continue to apply and must be demonstrated to be met.

**Summary of Applicant's Statement:** This habitat restoration proposal is in association with the Portland Harbor Natural Resources Damage Assessment (NRDA) process.

Concurrent with City review, the Project is being reviewed by the U.S. Army Corps of Engineers (CORPS) for compliance with Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act (RHA); the National Marine Fisheries Service (NMFS) for compliance with Section 7 of the Endangered Species Act (ESA); the State Historic Preservation Office (SHPO) for compliance with the National Historic Preservation Act (NHPA); Oregon Department of Environmental Quality (DEQ) for compliance with Section 401 of the CWA; and the Oregon Department of State Lands (DSL) for compliance with the Oregon Removal-Fill Law. The Project will also be reviewed by DEQ for the beneficial re-use of soil that will be excavated and re-used to restore upland habitat at the site. The restoration project is being conducted for Portland Harbor Natural Resource Trustee Council that is comprised of National Oceanic and Atmospheric Administration, acting on behalf of U.S. Department of Commerce; U.S. Fish and Wildlife Service, acting on behalf of U.S. Department of the Interior; Oregon Department of Fish and Wildlife, acting on behalf of State of Oregon; Confederated Tribes of the Grand Ronde Community of Oregon; Confederated Tribes of Siletz Indians; Confederated Tribes of the Umatilla Indian Reservation; Confederated Tribes of the Warm Springs Reservation of Oregon; and Nez Perce Tribe.

PGE proposes to restore and enhance tributary and off-channel habitats at the Property to serve as a NRDA restoration site. Restoration activities are proposed across approximately 62 acres of the Property. The following sections describe restoration actions individually at Sub-Areas 1 and 2 and describe the combined set of restoration activities for Sub-Areas 3 and 4 (See Attached Exhibit C.7):

#### **Sub-Area 1 Restoration Elements**

The restoration design for Sub-Area 1 centers on replacing the failed downstream culvert in order to remove the existing fish passage barrier. This action will restore fish access to the stream so it can function as seasonally available off-channel refugia habitat for juvenile salmonids and be available as seasonal habitat for other fish species. Secondary restoration design elements include adding channel complexity features (e.g. large wood, cobble and gravel stream substrate, beaver dam analogs, etc.) to promote self-sustaining channel-forming

processes, minor excavation to connect and expand wetland features, and enhancing vegetation throughout the sub-area.

### **Sub-Area 2 Restoration Elements**

The restoration design goals for Sub-Area 2 include a soils-placement berm between the substation and the Willamette River, management of invasive plant species, and enhancement of native vegetation through installation and maintenance of native plantings. Approximately 160,700 cubic yards of soil will be excavated from Sub-Areas 1, 3 and 4, and used to create a large upland berm on approximately 11 acres of the current substation area (the east storage yard, substation, former tank farm, and south unused area). Existing ground surface elevations for the storage areas range from 27 to 33 feet CPD; proposed final grade elevations are between 27 to 50 feet CPD. The placement areas will be graded to blend into adjacent topography and habitats along the shoreline and in Sub-Areas 1 and 3. The placement areas will then be planted with a mix of native upland grass, shrub, and tree species.

### **Sub-Areas 3 and 4 Restoration Elements**

The restoration design goals for Sub-Areas 3 and 4 are combined and focus on integrating these two currently distinct and hydrologically disconnected habitat areas into a large, contiguous, and hydrologically connected area. Restoration goals focus on the following elements: creation of a new outlet channel for the northern tributary so that fish can access the stream during all periods when stream flow is present; excavation of existing fill in Sub-Area 3 to expand off-channel habitat availability during high river stage conditions; preservation and enhancement of red-legged frog habitat in Sub-Area 4 through maintaining existing hydrology and placement of LWM; and establishing/enhancing native vegetation in Sub-Area 3 to improve and enrich existing and created wetland and riparian habitat types. Restoration activities in Sub-Areas 3 and 4 will focus on providing fish passage and converting a large area of riparian habitat in Sub-Areas 3 and 4 to Active Channel Margin (ACM) by connecting it to the river. To accomplish this, approximately 1,801 feet of new, low-gradient, meandering stream channel will be excavated through the dredge fill and native soil in Sub-Area 3, where it will discharge to the Willamette River. Streambed substrate and an engineered log jams and habitat LWM will be installed to stabilize the new stream channel, and to maintain designed elevations.

In addition to the tributary channel realignment, extensive portions of Sub-Area 3 will be vegetated to enhance and expand existing and converted wetland and riparian habitats, as well as control invasive species. The ash-cottonwood hardwood forest in Sub-Area 4 has an understory layer that is approximately 46 percent invasive species, based on baseline vegetation surveys. Habitat within the forest will remain unmodified, as this area is beyond the grading boundary for the northern tributary. Revegetation within Sub-Area 3 will be designed to expand and enhance functional habitats found on site and at similar restoration projects in the lower Willamette River.

Planting of new areas and supplemental planting in areas with established vegetation will generally entail:

- Emergent vegetation will be installed at elevations from 10 to 16 feet CPD.
- Scrub-shrub wetland vegetation will be installed at elevations from 13 to 20 feet CPD.
- Shrub riparian and upland vegetation will be installed from elevation 18 to 30 feet CPD.
- Forested vegetation will be installed from elevation at or above 17 feet CPD.
- Areas below 10 feet CPD are currently identified as beach or stream channel and will not be vegetated.

Within lower elevation areas of Sub-Area 3, the installation of native emergent vegetation in wetland areas (elevations 10 to 16 CPD) will be accomplished through targeted plantings performed following earthwork.

### **Sub-Area 4 Wetland Preservation and Enhancement**

The existing wetland habitat type in Sub-Area 4 is a consequence of berm construction and filling of Sub-Area 3. The large wetland complex remains inundated except for a few months during the late summer and is currently not accessible to, nor is it suitable for, use by juvenile

salmonids. Earlier restoration concepts for the Property emphasized improving the quality of and access to habitats at the Property for the benefit of juvenile salmonids, consistent with the priorities of the NRDA restoration program for Portland Harbor. Subsequent to development of these earlier restoration concepts, ODFW identified the wetlands in Sub-Area 4 as important habitat for red-legged frogs. ODFW raised concerns with PGE and the Trustees about the earlier restoration concept, as it would affect the amount and quality of existing red-legged frog habitat in favor of creating habitat for juvenile salmonids. In response to ODFW's concerns, PGE met with ODFW, USFWS and the Trustees in a series of meetings to discuss how to balance the needs of both red-legged frogs and juvenile salmonids. As a result of these meetings, PGE agreed to revise the restoration concept to include preservation and enhancement of the existing wetland amphibian habitat.

The large wetland complex within the southern portion of Sub-Area 4 is 10.3 acres and is dominated by reed canarygrass with dispersed patches of shrub and tree cover that are seasonally inundated. The upstream end of the new northern tributary channel alignment will be established at 15.4 feet CPD to match the existing outlet in the north corner of Sub-Area 4. The proposed 15.4-foot CPD elevation will maintain the existing hydraulic regime characterized by sustained periods of inundation over approximately 10.3 acres. The current designs for the Harborton and Miller Creek restoration projects have been coordinated so that when the river stage reaches 16 feet CPD, a continuous open-water side channel will extend from the Willamette River through the Harborton and Miller Creek properties and reconnect with Multnomah Channel.

**Agency and Neighborhood Review:** A Notice of Proposal in your Neighborhood was mailed on June 25, 2018. BDS received responses from City service bureaus and from the Linnton Neighborhood Association. On July 30, 2018 the applicant provided a narrative response to these Greenway Review comments (Exhibit A.3).

**Agency Review:** City service bureaus responded to this proposal. Please see the "E"-Exhibits for details. The comments are further addressed in findings for the appropriate criteria for review of the proposal, where applicable. Portland's Bureau of Transportation, Water Bureau, Parks Bureau, Fire Bureau, and BDS Life Safety have all indicated no concerns with the proposal.

BDS Site Development provided comments related to construction activities with the FEMA floodplain and the floodway, including questions pertaining to balanced cut and fill calculations in the floodplain and the applicant's "no-rise" analysis for the floodway. The applicant provided supplemental reporting on these issues (Exhibits A.3 and A.4) and BDS Site Development indicated that the July 30, 2018 Inter-Fluve memorandum affirms that the "no-rise" analysis reflects the work currently proposed within the floodway, and that a final "no-rise" analysis will need to be submitted with plans and specifications at the time of the construction permit review. BDS Site Development also noted that, per Exhibits A.1 and A.4, the balancing excavation exceeds the fill placement (Exhibit E.3). A geotechnical engineering report will be required at the time of construction permit submittal. The report must include recommendations for the design and construction of the proposed grading, including engineered fill slopes. The report must address bank and channel stabilization and the abandonment of existing utilities and culverts. The report must include recommendations for fill placement adjacent to existing structures. Specifically, the report must include estimates of the loading and settlements imparted upon existing structures by proposed fill placement. In addition, the report must evaluate slope stability for the proposed development under static and seismic loading. The seismic case must evaluate the performance of the site under maximum considered earthquake level shaking. The analyses must evaluate displacements associated with the critical failure surfaces if factors of safety are less than 1.1. An erosion control plan prepared by a Certified Professional in Erosion and Sediment Control (CPESC) or State of Oregon registered professional engineer will be required at building permit. These Site Development requirements will be included as conditions of approval. A construction permit from the Bureau of Development Services will be required for the clearing and grading work. Either BDS or BES staff will review the culvert design.



BES provided comments about DEQ's consideration of the site, assessment of the project's effects on site hydrology, the type of rock recommended around the culvert replacement in Sub Area 1, details regarding reed canarygrass removal, and the types of Greenway resources present at the site (Exhibit E.1). The applicant responded to these comments and provided supplemental analysis of site hydrology, discussion of the type of rock suitable for work around the culvert, details on the herbicides to be used for reed canarygrass control, and discussion of the project's beneficial effects on Greenway resources, noted in findings below for approval criteria as applicable (Exhibits A.3 through A.7). BES also noted that drainageways are present on the site, and drainage reserves are required to be placed over drainageways to maintain conveyance between properties; protect public and private stormwater infrastructure, property and structures; and protect and maintain the quality of surface waters. The proposed enhancement activities will encroach within the drainage reserves, and must therefore meet PCC and SWMM requirements for drainage reserve encroachments. BES has preliminarily reviewed the proposed drainage reserve encroachments, and does not object to the proposal. Note that drainage reserves must be clearly delineated on plans submitted at the time of permit review. This will be included in conditions of approval.

**Neighborhood Review:** One written response was received from the Neighborhood Association via electronic-mail in response to the proposal. The Linnton Neighborhood Association raised concerns with the possibility of lowering water levels within the wetland in Sub Area 4, and negatively impacting breeding habitat for northern red-legged frog. They also pointed out a discrepancy between the final grade of the head of the north tributary depicted on city land use review plans versus federal/state joint permit application plans. Lastly, they expressed concerns that when the Willamette River is flowing above 15.4 feet, the associated high flows in the north tributary would damage amphibian egg masses.

*Applicant response (Exhibit A.3):* The applicant asserts they "have every intention of not altering hydrology in that feature. The gravel subgrade design calls for washing fine sediments into the coarse channel bed material to prevent surface water from moving subsurface which may leave the new channel bed dry and allow flows to drain below elevation 15.4-ft. This is true along the entire built channel. However, at the entry point to the channel extra precautions could be taken to ensure surface water in Sub- Area 4 is not lost to hyporheic flow. Extensive monitoring and adaptive management is required for the first ten years after construction. Afterward, the site will be turned over to a non-profit conservation group. If sub-area 4 conditions change, PGE will work with the Trustees to identify appropriate changes to the project."

"There are concerns that Willamette River flows above 15.4' CPD will create a slough effect through the north tributary and existing wetland, transforming the existing palustrine (still water) habitat of Wetland G into riverine habitat. The high flows would be detrimental to amphibian egg masses and could cause sediment deposition within the wetland or other undesirable alterations. [The applicant appreciates] the concern over the risk of lentic waters in Sub-Area 4 becoming lotic and potentially negatively affecting amphibian habitat. We are confident that the project poses no risk in this regard. Disregarding lotic flows into the site or outflow from the current outlet for the moment, the location most likely to experience lotic water movement in Sub-Area 4 is at the entry point to the proposed channel. [The applicant provided a *Project Site Hydrology and Hydraulics* analysis (Exhibit A.6) that shows], localized flow under two anticipated high-flow events (falling high tide and 100-year peak discharge during low water in the Willamette River) are anticipated to increase water velocity between 0.10 and 0.20 feet per second extending 50 feet into Sub- Area 4. Beyond 50 feet, effects are anticipated to be negligible."

## **ZONING CODE APPROVAL CRITERIA**

### **33.440.350 Greenway Review Approval Criteria**

The approval criteria for a Greenway review have been divided by location or situation. The divisions are not exclusive; a proposal must comply with **all** of the approval criteria that apply to the site. A

Greenway review application will be approved if the review body finds that the applicant has shown that all of the approval criteria are met.

**A. For all Greenway reviews.** The Willamette Greenway design guidelines must be met for all Greenway reviews.

**Findings:** The Willamette Greenway Design Guidelines address the quality of the environment along the river and require public and private developments to complement and enhance the riverbank area. The Design Guidelines are grouped in a series of eight Issues:

**Issue A. Relationship of Structures to the Greenway Setback Area:** This issue “applies to all but river-dependent and river-related industrial use applications for Greenway Approval, when the Greenway trail is shown on the property in the *Willamette Greenway Plan*.” These guidelines call for complementary design and orientation of structures so that the Greenway setback area is enhanced;

**Issue B. Public Access:** This issue “applies to all but river-dependent and river-related industrial use applications for Greenway Approval, when the Greenway trail is shown on the property in the *Willamette Greenway Plan*.” These guidelines call for integration of the Greenway trail into new development, as well as the provision of features such as view points, plazas, or view corridors;

**Findings:** The Greenway trail designation is not shown on the property in the Willamette Greenway Plan, therefore, Issues A and B do not apply.

**Issue C. Natural Riverbank and Riparian Habitat:** This issue “applies to situations where the river bank is in a natural state, or has significant wildlife habitat, as determined by the wildlife habitat inventory.” These guidelines call for the preservation and enhancement of natural banks and areas with riparian habitat;

**Guidelines:**

**1. Natural Riverbanks.** The natural riverbank along the Willamette River should be conserved and enhanced to the maximum extent practicable. Modification of the riverbank should only be considered when necessary to prevent significant bank erosion and the loss of private property, or when necessary for the functioning of a river-dependent or river-related use.

**2. Riparian Habitat.** Rank I riparian habitat areas, as identified in the wildlife habitat inventory, should be conserved and enhanced with a riparian landscape treatment. Other riparian habitat should be conserved and enhanced through riparian landscape treatments to the maximum extent practical. Conservation however does not mean absolute preservation. Some discretion as to what vegetation should remain and what can be removed and replaced should be permitted. Riparian habitat treatments should include a variety of species of plants of varying heights that provide different food and shelter opportunities throughout the year.

**Findings:** The proposal includes disturbance and modification of a small amount of the natural riverbank along the Willamette River in Sub-Areas 1 and 3 where the south and north tributary streams will discharge to the Willamette River so fish can access the streams during all periods when flow is present in the stream. Vegetation and soil would be cleared at the confluence of the North Tributary and Willamette River to create a new outlet. During construction of the new channel outlets, structures will be installed to reduce erosion of exposed soils. Erosion control measures are shown on the attached site plans. After clearing and grading, the riverbank will be revegetated with native vegetation. Erosion control structures will remain in place until native vegetation becomes established.

Sub-Area 4 is designated as Rank 1 riparian habitat. The Project will alter the existing vegetation and habitats within the other sub areas (Sub-Areas 1, 2, and 3) during clearing and grading activities, but the purpose of the Project is to restore and improve seasonally available off-channel aquatic and riparian habitat for fish and wildlife. Specifically, the proposed restoration is intended to restore and enhance habitat for species that were potentially injured by historical damages to the Portland Harbor. Enhancements to riparian habitat primarily

include removal and control of invasive, non-native plants, and revegetation with native plants. Detailed discussion of riparian enhancement is presented in the applicant's narrative in Exhibit A.1 of the application case file. Within Sub-Area 4 the applicant proposes to install large wood habitat features within ponds and elsewhere to provide cover and basking/perch habitat. Wood will be placed using light to moderate weight machinery with low ground pressure tracks or tires operating on drier soils and minimizing maneuvering to the extent possible to minimize ground disturbance.

Wetland and stream restoration success will be gauged by tracking a variety of performance standards relating to the successful establishment of wetland and stream conditions. Performance standards, monitoring methods, and adaptive management are described in detail in Appendix H in the applicant's narrative (Exhibit A.1 of the application case file). In the event that monitoring data demonstrate that the Property is failing to meet performance standards, PGE or their designated consultant will review monitoring data and adjust maintenance activities as necessary to meet the objectives of this plan. The existing river banks will be conserved and enhanced and all riparian habitat on the site, including Rank I, will be preserved and enhanced and Issue C is met.

**Issue D. Riverbank Stabilization Treatments:** This Issue “applies to all applications for Greenway Approval.” This guideline promotes bank treatments for upland developments that enhance the appearance of the riverbank, promote public access to the river, and incorporate the use of vegetation where possible;

**Guidelines:**

**1. Riverbank Enhancement.** Riverbank stabilization treatments should enhance the appearance of the riverbank, promote public access to the river, and incorporate the use of vegetation where practical. Areas used for river-dependent and river-related industrial uses are exempted from providing public access.

**Findings:** Issue D promotes bank treatments for “upland developments” to promote public access. The proposed Harborton Restoration project does not propose upland development, but rather an extensive resource enhancement endeavor. Further, there is no recreational trail designation on City maps of the site, and no public access is proposed as part of this resource enhancement project.

The proposed Project includes modification of a small amount of the natural riverbank along the Willamette River in Sub-Areas 1 and 3, where the south and north tributary streams discharge to the Willamette River, so fish can access the streams during all periods when flow is present in the stream. During construction of the new channel outlets, erosion control devices will be installed to reduce erosion of exposed soils. Native vegetation will be planted for long-term stabilization of the riverbank in Sub-Areas 1, 2, and 3, thereby incorporating the use of vegetation and enhancing the appearance of the riverbank. Issue D is met.

**Issue E. Landscape Treatments:** This Issue “applies to all applications for Greenway Approval which are subject to the landscape requirements of the Greenway chapter of Title 33 Planning and Zoning of the Portland Municipal Code.” This Issue calls for landscaping treatments that create a balance between the needs of both human and wildlife populations in the Greenway Setback area or riverward of the Greenway Setback.

**Guidelines:**

**1. Landscape Treatments.** The landscape treatment should create an environment which recognizes both human and wildlife use. Areas where limited human activity is expected should consider more informal riparian treatments. Areas of intense human use could consider a more formal landscape treatment. The top of bank may be considered a transition area between a riparian treatment on the riverbank and a more formal treatment of the upland.

**2. Grouping of Trees and Shrubs.** In areas of more intense human use, trees and shrubs can be grouped. The grouping of trees and shrubs allows for open areas for human use, and has the secondary value of increasing the value of the vegetation for wildlife.

**3. Transition.** The landscape treatment should provide an adequate transition between upland and riparian areas and with the landscape treatments of adjacent properties.

**Findings:** The purpose of the Project is to restore and improve seasonally available off-channel aquatic and riparian habitat for fish and wildlife. There is no Greenway Trail designation on City maps of the site and, as an electrical substation, even those portions of the site not restored or enhanced for native wildlife habitat, are not suitable for human use. Landscape treatments are proposed to enhance wildlife use through the removal and control of invasive vegetation, planting of native vegetation, and the creation and enhancement of stream, riparian, wetland, and upland habitat.

All disturbed areas will be enhanced or restored with native vegetation appropriate to the site conditions and elevations. The successful installation of native vegetation will require site preparation, seeding, planting, and ongoing non-native species control. The planting plan is outlined in Section 3.4 of Exhibit A.1. Graphic Exhibits C.33, C.34, and C.35 depict planting areas throughout the Property. Section 3.4 of Exhibit A.1 contains a list of species for each planting zone that can stabilize soils, provide native wetland, riparian, and upland habitat, and aid in the control of invasive species. Native plants include those found in the *Portland Plant List*.

The applicant provided a “typical” planting diagram to indicate the location and number of mitigation trees and shrubs that would be provided in each planting area shown on Exhibit C.33. The planting typical provided a general idea of what a 40-foot by 40-foot planting area might look like.

In order to confirm appropriate and timely placement, and adequate coverage of mitigation plantings, a Zoning Permit will be required for on-site inspection of the mitigation planting, at installation. At the time of the permit, the applicant must indicate whether the mitigation plantings will be tagged for inspection or if the applicant will accompany the BDS Zoning Permit inspector to the site to indicate where mitigation planting has occurred.

Removal of trees from the site will result in a loss of organic input, a loss of slope stabilization functions, a loss of wildlife habitat functions and of forest structure. To offset these additional impacts, the applicant will be required to retain all sections of tree trunks greater than 12 inches in diameter, on the site in order to replace some of these lost functions.

The proposed Planting Plan will be installed and maintained under the regulations outlined in Section 33.248.040.A-D (Landscaping and Screening). The applicant proposes extensive monitoring, maintenance and adaptive management to ensure survival of proposed plantings. To confirm maintenance of the required plantings for the initial establishment period, the applicant will be required to have the plantings inspected, by applying for a Zoning Permit five years after plantings are installed.

Human use of the Property is low, and the proposal focuses on riparian riverbanks, wildlife habitat, and wetland treatments. With conditions to ensure that restoration plantings are planted on the site, that all cut trees with trunks greater than 12 inches in diameter are retained on site, and that plantings are maintained and inspected as described above, Issue E Guidelines will be met.

**Issue F. Alignment of Greenway Trail:** This issue “applies to all applications for Greenway Approval with the Greenway trail shown on the property in the *Willamette Greenway Plan*.” These guidelines provide direction for the proper alignment of the Greenway trail, including special consideration for existing habitat protection and physical features in the area of the proposed alignment;

**Findings:** There is not a Greenway trail designation shown on City maps for the property in the *Willamette Greenway Plan*, therefore Issue F does not apply.

**Issue G. Viewpoints:** This issue “applies to all applications for Greenway Approval with a public viewpoint shown on the property in the *Willamette Greenway Plan* and for all applications proposing to locate a viewpoint on the property”. These guidelines provide direction about the features and design of viewpoints, as required at specific locations;

**Issue H. View Corridors:** This issue “applies to all applications for Greenway Approval with a view corridor shown on the property in the *Willamette Greenway Plan*.” These guidelines provide guidance in protecting view corridors to the river and adjacent neighborhoods;

**Findings:** There are no viewpoints or view corridors identified on the site, therefore, Issues G and H do not apply.

**B. River frontage lots in the River Industrial zone.**

**Findings:** The project site is not located in an area with the River Industrial designation. Therefore, this criterion is not applicable.

**C. Development within the River Natural zone.** The applicant must show that the proposed development, excavation, or fill within the River Natural zone will not have significant detrimental environmental impacts on the wildlife, wildlife habitat, and scenic qualities of the lands zoned River Natural. The criterion applies to the construction and long-range impacts of the proposal, and to any proposed mitigation measures. Excavations and fills are prohibited except in conjunction with approved development or for the purpose of wildlife habitat enhancement, riverbank enhancement, or mitigating significant riverbank erosion. [and]

**D. Development on land within 50 feet of the River Natural zone.** The applicant must show that the proposed development or fill on land within 50 feet of the River Natural zone will not have a significant detrimental environmental impact on the land in the River Natural zone. [and]

**E. Development within the Greenway setback.** The applicant must show that the proposed development or fill within the Greenway setback will not have a significant detrimental environmental impact on Rank I and II wildlife habitat areas on the riverbank. Habitat rankings are found in the *Lower Willamette River Wildlife Habitat Inventory*

**Findings:** Only habitat restoration and enhancement activities will occur *within* the River Natural zone, within 50 feet of the River Natural zone and within Rank I and II wildlife habitat areas on the site. Within these areas, excavation of material and restoration of upland, wetland, and stream habitats will occur, but is not expected to result in a significant detrimental environmental impact to the existing natural resources on the site. Taxlot 100 is zoned River Natural. This taxlot corresponds to Sub-Area 4. A portion of Sub-Area 3 abuts the River Natural zone, and is therefore within 50 feet of it.

In the River Water Quality overlay zone the Greenway Setback is 50 feet to 200 feet from the top of bank, depending on the slope landward of top of bank. The location of the Greenway Setback on the property is shown on graphic exhibits provided by the applicant. Sub-Area 4 is designated Rank I habitat; the shoreline of Sub-Areas 1 and 2 are designated Rank II. Remaining portions of the site are designated Rank III and V.

The area of land that will be disturbed by clearing and grading activities is shown on Exhibits C.4, C.6, and C.7.

The purpose of the Project is to enhance and restore wildlife habitat, providing long-term beneficial impacts, particularly for anadromous fish, red-legged frogs, birds, and terrestrial animals. The proposed modifications will result in net beneficial effects for listed salmonids, their critical habitat, and other resident aquatic, terrestrial, and avian species by re-introducing a diversity of ecological processes to the site while maintaining and enhancing existing beneficial habitat. The main component is re-establishing frequent channel connectivity to low-lying areas at the site. Benefits of creating a fish-accessible channel

include increased biomass exchanges and a significant increase in juvenile salmonid use of site resources.

Construction and operation of the proposed Project will modify habitat for listed salmonids by creating off-channel habitat, restoring two cold-water tributaries, and improving stream, wetland, riparian, and upland habitats. The proposed modifications will result in net beneficial effects for listed salmonids, their critical habitat, and other resident aquatic, terrestrial, and avian species. Potential construction-related impacts include impacts associated with construction of temporary haul roads as depicted on Exhibit C.6, tree removal and soil excavation for culvert installation, and tree removal, excavation and regrading of off-channel habitats at the north and south tributaries. Impacts may include direct and indirect effects resulting from habitat alteration; visual and auditory/vibratory disturbances; increased risk of erosion, turbidity, and sedimentation; potential risk from accidental contaminant spills; and potential risk of exposure resulting from residual contaminants exposed in the post-restoration cut surfaces.

Erosion and sediment controls will be installed prior to, during, and after clearing and grading activities as shown on Exhibits C.5, C.8, and C.9. Further, the applicant will be required to provide brightly-colored sediment fencing at the “limits of disturbance” line to double as a temporary construction fence without the additional impact of installing a second fence. This will alert construction workers that areas beyond the fence are to be protected. After clearing and grading, the areas disturbed by construction activities will be revegetated with native plants suitable to the habitat and monitored long-term for success, resulting in improved habitat and environmental conditions on the Property.

The applicant’s site plans indicate grading activities in close proximity to trees in Sub-Areas 1 (within the Greenway Setback and riverward of the Greenway Setback) and n Sub-Area 4 (within the River Natural overlay zone), while designating these trees to be preserved. However, a detailed tree protection plan that meets the requirements of Portland Tree Code (Title 11) has not been provided to show how these trees are to be protected. The applicant will be required to provide the City with a Final Tree Protection Plan at construction permit time, that details how trees indicated to be preserved within areas delineated on Exhibits C.12, and in more detail on Exhibit C.37, shall be specifically protected.

The applicant proposes to construct “temporary” haul roads as shown on Exhibit C.6, to provide construction vehicle access to portions of the site to be excavated and filled, to accomplish construction of the north and south tributaries, as well as the upland berm. The temporary haul road to be constructed within Sub-Area 3 is within 50 feet of the River Natural overlay zone along the west side of Sub-Area 3, and within the Greenway Setback along the north edge. In order to avoid long-term significant detrimental impact in these areas, the applicant will be required to remove the temporary haul road within 5 years of final planting.

The individual and combined effects of all actions permitted for this project are not expected to permanently impair currently properly functioning habitats, appreciably reduce the functioning of already impaired habitats, or retard the long-term progress of impaired habitats toward proper function. The anticipated outcome of the proposed action is long-term progress toward proper function by recreating off-channel salmonid habitat in the Portland Harbor, where the lack of such habitat has been identified as a limiting factor in species recovery.

The Project will enhance and restore wildlife habitat, providing long-term beneficial impacts, particularly for anadromous fish, red-legged frogs, birds, and terrestrial animals. Excavation and fill necessary to complete the Project will temporarily disturb wildlife, wildlife habitat, and scenic qualities of the Property, but will not result in significant detrimental impacts. Construction of the restored and enhanced habitats will be managed by PGE to ensure that the habitats are constructed as designed and that impacts to existing fish and wetland habitats, as well as other sensitive resources, will be avoided or minimized, where possible. Measures that will be taken throughout construction to protect sensitive resource areas at the Property are described in further detail in Exhibit A.1, Section 3.6.

The City's Bureau of Environmental Services provided comments pertaining to possible impacts resulting from reed canarygrass management and habitat for existing wildlife. The applicant provided the following findings in response to BES concerns:

Response: Reed canarygrass in select areas of Sub-Area 1 will be removed through scalping and removing the root mass. Clean topsoil will replace the removed material and the disturbed area will be planted and seeded with native herbaceous and woody species. In other targeted areas, herbicide will be applied by a licensed herbicide-application professional used one time per year, as necessary, to control reed canarygrass, blackberry, and other invasive species. PGE will strictly avoid use of any herbicide in areas identified as red-legged frog breeding habitat.

PGE will adhere to the standards identified in SLOPES V STU, which details herbicide application methods, materials, and procedures. PGE proposes to use a glyphosate-based herbicide approved for use in aquatic settings (highlighted in the table below). SLOPES V STU standards are included as Attachment D.

The intent of the project is habitat restoration. As described in the design set and the Greenway Review narrative, the project will provide ecological uplift to over 62 acres of habitat through:

- Creation of 1,800 linear feet of new, fish-accessible channel (North Tributary)
- Increasing wetland acreage from 17.7 acres to 18.34 acres; enhancing 3.29 acres of wetland habitat
- Connecting floodplain wetlands to fish-accessible channels to provide aquatic biota interactions during high water events
- Planting over 50,100 native trees and shrubs and 83,500 native herbaceous plugs, corymbs, and bulbs
- Adding over 280 large woody material pieces in and around stream channels and floodplain habitat
- Placing six rock piles to primarily serve as mink habitat, but to also benefit reptiles, small mammals, insects, and other wildlife expected to utilize these features
- Removing a fish barrier from the South Tributary to re-open 1,135 linear feet of stream channel to fish
- Removing and controlling invasive species, mostly Reed canarygrass, through excavation (Sub-Area 1) and through limited, targeted herbicide application in Subareas 3 and 4
- Increasing floodplain capacity by removing over 83,000 cubic yards of non-native dredge material within the floodplain
- Increasing upland habitat by reducing the footprint of the existing PGE industrial site from 17.7 acres to 8.2 acres and planting native herbaceous and woody species over the reclaimed area.
- Preserving critical northern red-legged frog habitat by maintaining current hydrologic conditions and limiting enhancement measures to placement of large woody material.

What may not be stated in the Greenway Review application packet is a description of several layers of review, discussion, and consideration over the past five years held between PGE and stakeholders that include USFWS, NOAA, NMFS, ODFW, local tribes, community groups, DEQ, and others. Those measures include but are not limited to:

- Monitoring and adaptively managing habitat at the site under a plan reviewed by an outside technical science committee, including USFWS, NOAA, NMFS, ODFW, and local tribes
- Preserving, in perpetuity, the 62-acre natural area following PGE's 10-year management and maintenance of the site.

The Monitoring and Adaptive Management Plan (MAMP) found in Exhibit A.1, Appendix H, has been developed to help ensure the Project's goals are being achieved. The Trustees

developed the MAMP (Trustee Council 2014) to aid in designing site-specific monitoring and stewardship plans for NRDA restoration projects. As part of the guidance, the Trustees presented a model detailing the monitoring phases that will be required. Under the model, restoration site monitoring is divided into four phases: Baseline Monitoring, Implementation Monitoring, Effectiveness Monitoring, and Long-Term Stewardship, which are described by the Trustees as follows:

- Baseline Monitoring occurs before project work commences at the site to document pre-restoration conditions.
- Implementation Monitoring occurs during and following project construction to document that the restoration elements were installed/constructed as proposed.
- Effectiveness Monitoring takes place during an initial performance period of 10 years following construction/implementation or as needed until performance standards are met.
- Long-term Stewardship Monitoring begins after the 10-year effectiveness monitoring period and entails less intense monitoring to ensure restoration goals are stable and habitat functionality persists.

The project will not have significant long-term detrimental environmental impacts and the applicant can demonstrate the establishment and success of the restoration efforts by monitoring and maintaining the plantings for five years following project implementation, and according to the Monitoring and Adaptive Management Plan (MAMP) found in Exhibit A.1, Appendix H. With conditions for a Final Tree Protection Plan, to remove the temporary haul roads from the west, north and east edge of Sub-Area 3, for a City inspection five years after planting the site to confirm success of the restoration work, and for brightly colored silt fencing to be placed along the perimeter of the project at the “limits of disturbance” line, these criteria will be met.

**F. Development riverward of the Greenway setback.** The applicant must show that the proposed development or fill riverward of the Greenway setback will comply with all of the following criteria:

**1. The proposal will not result in the significant loss of biological productivity in the river;**

**Findings:** The overall project is designed to provide ecological improvement by restoring a diversity of habitat functions to the site, including increased biological productivity in the river. The re-establishment of a fish-accessible channel onto the property, along with riparian habitat enhancements is intended and anticipated to increase biological productivity.

With any excavation project, the potential exists for erosion of soils, which can contribute to increased local turbidity of area waterways. Turbidity, in volume and/or duration, has the potential to directly and indirectly affect fish and other aquatic species. In volume, turbidity can damage gill structures, resulting in injury and an increased risk of mortality. Construction-related erosion and turbidity impacts are temporary and possible throughout all phases of the Project, though impacts are more likely during the in-water work period of the construction year. Potential vectors of erosion and turbidity include precipitation-induced stormwater runoff from the site, wind blow of exposed soils, in-water excavation, shoreline grading, equipment movement on the site, and loading/hauling of excavated material.

Excavation and fill may temporarily impact the aquatic macroinvertebrate community in the river for a short distance downstream of the Property. Loss of aquatic macroinvertebrates has potential to impact fish and aquatic arthropods, as macroinvertebrates comprise a portion of these trophic guilds’ prey and forage base. The loss to biological productivity is not considered significant, as the area is comparatively small in the context of the lower Willamette River subbasin, is temporary in nature, and the Property does not represent particularly productive habitat to begin with (BP 1986).



Finally, the proposed Project will contribute to the long-term improvement in the health of the aquatic biotic community. In conjunction with other remediation projects in the lower Willamette River, this Project will improve habitat along the river, and therefore, the species that rely upon these aquatic resources.

To minimize risks associated with erosion and turbidity, PGE has developed an erosion and sediment control plan (ESCP) to comply with DEQ criteria for coverage under a NPDES 1200-C construction stormwater permit. The ESCP was developed using the guidelines of Portland City Code Title 10 Erosion and Sediment Control Regulations and supplemental guidance provided by NOAA Fisheries. These measures were developed by a certified Contractor Erosion and Spill Control Lead, in conformance with the requirements of the DEQ's NPDES program. The ESCP was provided with the NPDES 1200-C application. Further, as BDS Site Development has noted, An erosion control plan prepared by a Certified Professional in Erosion and Sediment Control (CPESC) or State of Oregon registered professional engineer will be required at building permit.

With construction management described by the applicant, and with the short-term nature of the impacts, and with conditions for erosion control plans, this criterion will be met.

**2. The riverbank will be protected from wave and wake damage;**

**Findings:** The Project will alter a small amount of the existing riverbank where the new tributary in Sub-Areas 3 and 4 and existing tributary in Sub-Area 1 discharge to the Willamette River. The specific areas of riverbank that will be disturbed by clearing and grading activities are shown on Exhibits C.12 and Exhibits C.14 – C.28. Erosion and sediment controls will be installed prior to, during, and after clearing and grading activities at the riverbank. After clearing and grading, the area of riverbank disturbed by construction activities will be revegetated with native plants suitable to the habitat and monitored for success, thereby, protecting the riverbank from wave and wake damage by the vegetation. This criterion will be met.

**3. The proposal will not:**

- a. Restrict boat access to adjacent properties;**
- b. Interfere with the commercial navigational use of the river, including transiting, turning, passing, and berthing movements;**
- c. Interfere with fishing use of the river;**
- d. Significantly add to recreational boating congestion; and**

**4. The request will not significantly interfere with beaches that are open to the public.**

**Findings:** The proposed action will have no effect on boat access to the property or adjacent properties, nor will it have an effect on commercial navigation, fishing use or this river, or recreational boating congestion. No public beaches are located at the site. Actions proposed under this application are inland of the river channel, and these criteria do not apply.

**G. Development within the River Water Quality overlay zone setback.** If the proposal includes development, exterior alterations, excavations, or fills in the River Water Quality overlay zone setback the approval criteria below must be met:

**Findings:** Activity under this application does not include streets, rights-of-way, driveways, outfalls, or utilities. Proposed work does not include a public safety facility, or a public recreational facility. Therefore, criteria G.1, G.2, and G.4 do not apply to the proposal.

The current proposal is to enhance fish and wildlife habitat at the PGE Harborton site and is considered to be a resource enhancement proposal as addressed by criterion G.3.

**G.3. Resource enhancement projects.** In the River Water Quality overlay zone setback, resource enhancement projects will be approved if the applicant's impact evaluation demonstrates that all of the following are met:

**a. There will be no significant detrimental impact on functional values;**

**Findings:** Damages to a natural resource are evaluated by identifying the ecological functions or "services" the resource provides, determining the baseline level of the services provided by the injured resource, and quantifying the assessed reduction in service levels resulting from pollution and other impacts identified through the NRDA process. The Trustees are employing Habitat Equivalency Analysis (HEA) tools as the method by which to quantify resource diminishment. HEA was developed by NOAA Fisheries (2012) specifically for NRDA.

Within the context of the Trustees' assessment of damages from industrial activities in the Portland Harbor, loss of juvenile salmonid rearing habitat has been identified as a natural resource damage (Trustee Council 2010). All juvenile salmonids in the Willamette River system must pass through the Harbor during outmigration. Historically, juvenile salmonids used the lower Willamette River for substantial feeding and growth prior to movement into the Columbia River, its estuary, and the sea (Trustee Council 2010). Physical and chemical degradation of this river reach has compromised its ability to support juvenile salmonids. Juvenile salmonids are believed to now pass rapidly through the Harbor for lack of suitable off-channel habitat (Trustee Council 2010). Consequently, Willamette River smolts entering the Columbia River estuary and the Pacific Ocean are believed to be less fit compared to their pre-development, antecedent runs.

Loss of associated off-channel habitats such as large off-channel lakes, alcoves, lagoons, and the access to the historic floodplain have further diminished the capacity of this river reach for nurturing endemic salmonids and other native fish populations (Trustee Council 2010). Salmon habitat modeling for the Willamette River Subbasin Plan, conducted by the Northwest Power and Conservation Council (NWPCC), identifies the lack of off-channel habitat in the lower Willamette River as a limiting factor for salmonid recovery (NWPCC 2004), including recovery of salmonids listed under the ESA. The Subbasin Plan identifies Portland Harbor off-channel habitat as the second highest restoration priority to achieve the goals of salmonid recovery, including recovery of ESA-listed stocks. These factors point toward restoring the quality and types of habitats historically used by juvenile salmonids as a means of recovering those species protected under the ESA and improving conditions for all aquatic species found in this reach.

PGE proposes to restore tributary and off-channel habitats at its Harborton Substation property in the lower Willamette River watershed to offset potential liability under the Portland Harbor NRDA action undertaken by the Trustees. The 74-acre Harborton Substation property is identified as a high-value restoration opportunity in the City's 2009 River Plan North Reach Recommended Draft (COP 2009) and by the Trustee Council, as part of its Ecological Restoration Portfolio (Trustee Council 2012). PGE proposes to restore and enhance approximately 62 acres of the property.

The proposed Project has been designed to improve the long-term functional values found within the Property through habitat creation and enhancement and will not result in a significant detrimental impact on functional values. Construction and operation of the proposed habitat restoration project will modify habitat for listed salmonids by creating and improving off-channel tributary and floodplain habitat and enhancing wetland and riparian habitats. The proposed modifications will result in net beneficial effects for listed salmonids, their critical habitat, and other resident aquatic, terrestrial, and avian species. Construction-related impacts include impacts associated with clearing and grubbing, excavation of off-channel habitats, installation of a fish-passable culvert on the southern tributary, creation of a new outlet connection to the Willamette River for the northern tributary, and regrading and realignment of both

tributaries. Effects associated with such impacts include potential direct and indirect effects resulting from tree removal, the impact of grading on remaining native vegetation, habitat alteration; visual and auditory (noise) disturbances to wildlife; temporary degradation of suitable habitat resulting from possible increases in turbidity, sedimentation, and contaminant spills; and potential risk of exposure to residual contaminants exposed in the post-restoration cut surface.

The application includes site plans that indicate areas to be regraded in close proximity to trees designated to be preserved, however a detailed tree protection plan that meets the requirements of Portland Tree Code (Title 11) has not been provided. The applicant should provide the City with a Final Tree Protection Plan at construction permit time, that details how trees indicated to be preserved within areas delineated on Exhibits C.12, and in more detail on Exhibit C.37, shall be specifically protected. The Final Tree Protection Plan should indicate temporary, 4-foot high, bright orange construction fence at or beyond the edge of the prescriptive (or alternative) Root Protection Zone as described in 11.60.030. If the performance path (11.60.030 C.2) is used, the Final Tree Protection Plan shall be signed by a certified arborist.

The project will not have significant long-term detrimental environmental impacts and the applicant can demonstrate the establishment and success of the restoration efforts by monitoring and maintaining the plantings for five years following project implementation, and according to the Monitoring and Adaptive Management Plan (MAMP) found in Exhibit A.1, Appendix H. With conditions that the applicant will provide the Final Tree Protection Plan, and have it reviewed via a BDS Zoning Permit, to remove the temporary haul roads from the west, north and east edge of Sub-Area 3, for a City inspection five years after planting the site to confirm success of the restoration work, and for brightly colored silt fencing to be placed along the perimeter of the project at the "limits of disturbance" line, the project will not result in any significant detrimental impact and this criterion will be met.

**b. There will be a significant improvement of at least one functional value; and**

**Findings:** Once constructed, the Project will provide or enhance habitat elements to support native fish, terrestrial species, amphibian species, avian species, and native vegetation. Habitat elements designed to specifically benefit ESA-listed salmonids include removal of fish passage barriers and realignment of two cold-water tributaries to provide additional low-elevation off-channel habitat, shallow water, edge habitats, high flow refugia, vegetated shoreline, and channel complexity resulting from topographic contouring and installation of large woody debris and other habitat elements. These elements have been identified by the Trustees as factors limiting the health and recovery of juvenile Chinook in the lower Willamette River recovery domain (Trustee Council 2010). The restoration activities proposed for the site will benefit native fish within the lower Willamette River system, including the salmon and steelhead populations that are expected to use the site at varying stages of their life cycles. The project will improve critical habitat designated for four listed anadromous salmon species in the Willamette/Lower Columbia Recovery Domain and is consistent with the primary constituent elements (PCE) required by coho salmon, for which critical habitat has been proposed, but not adopted by final rule.

The project has been designed primarily to provide habitat for native fish species occurring in the Willamette River and Multnomah Channel systems, including federally threatened and endangered fish species. The project will also benefit a variety of aquatic, terrestrial, and avian species occurring in the vicinity, such as northern red-legged frog (*Rana aurora auroa*), Pacific lamprey (*Lampetra tridentata*), white sturgeon (*Acipenser transmontanus*), American mink (*Neovison vison*), osprey (*Pandion haliaetus*), and bald eagle (*Haliaeetus leucocephalus*), in addition to providing improved habitat for breeding birds, benthic macroinvertebrates, and variety of small mammals.

The applicant's Project description show the potential for significant improvement of off-channel salmon habitat, enhanced red-legged frog habitat, improvements along the Willamette River of both riparian and upland bird and wildlife habitat and their findings have demonstrated that this criterion is met.

**c. The project is generally consistent with the recommendations of any applicable City-adopted watershed restoration plans.**

**Findings:** The Harborton Property is identified as a high-value restoration opportunity in the City's 2009 River Plan North Reach Recommended Draft (COP 2009) and by the Trustees, as part of the Trustee's Ecological Restoration Portfolio (Trustee Council 2012). Portland's Watershed Management Plan (BES 2006) identifies several watershed health goals in four broad categories. These goals were established in the Integrated Framework for Watershed Health (December 2005):

Hydrology: Move toward normative stream flow conditions to protect and improve watershed and stream health, channel functions, and public health and safety.

Physical Habitat: Protect, enhance, and restore aquatic and terrestrial habitat conditions and support key ecological functions and improved productivity, diversity, capacity, and distribution of native fish and wildlife populations and biological communities.

Water Quality: Protect and improve surface water and groundwater quality to protect public health and support native fish and wildlife populations and biological communities.

The proposed Project is consistent with actions identified to achieve these goals by removing and controlling invasive and non-native plants and revegetating the Property with native species, creating and enhancing aquatic and terrestrial habitats, removing barriers to fish passage/access to cold water tributaries, and removing a failed culvert, thereby returning hydrology to more normative condition and quality.

These goals will be met by the proposal and this criterion is met.

**H. Mitigation or remediation plans.** Where a mitigation or remediation plan is required by the approval criteria of this chapter, the applicant's mitigation or remediation plan must demonstrate that the following are met:

1. Except when the purpose of the mitigation could be better provided elsewhere, mitigation will occur:
  - a. On site and as close as practicable to the area of disturbance;
  - b. Within the same watershed as the proposed use or development; and
  - c. Within the Portland city limits.
2. The applicant owns the mitigation or remediation site; possesses a legal instrument that is approved by the City (such as an easement or deed restriction) sufficient to carry out and ensure the success of the mitigation or remediation plan; or can demonstrate legal authority to acquire property through eminent domain;
3. The mitigation or remediation plan contains a construction timetable and a minimum 1 year monitoring and maintenance plan that demonstrates compliance with Subsection 33.248.090.E and includes the following elements:
  - a. Identification of the responsible party or parties that will carry out the mitigation or remediation plan;
  - b. Identification of clear and objective performance benchmarks that will be used to judge the mitigation or remediation plan success; and
  - c. contingency plan that indicates the actions to be taken in the event that performance benchmarks are not met.

**Findings:** Although mitigation is not technically required by any of the approval criteria that apply to this proposal, the purpose of the Project is to restore and improve seasonally available off-channel aquatic and riparian habitat for fish and wildlife. Specifically, in association with the Portland Harbor NRDA process, the proposed restoration is intended to restore and enhance habitat for species that were potentially injured by historical damages to the Portland Harbor. As a result of past and continued impacts to the Willamette River in the Portland Harbor, this Project is needed to address the lack of available off-channel, fish-accessible aquatic habitat within the Portland Harbor, thereby directly addressing one of the primary limiting factors for fish recovery within the Portland Harbor. The proposed Project provides long-term benefit to human and ecological health. Identified short-term impacts to site habitat will recover over time, as the restoration plantings survive, succeed, and mature, and the Project is considered a beneficial enhancement to current habitat conditions.

The applicant's application describes the elements that will be restored, by sub-area; construction timing and sequencing, and avoidance and minimization measures. Performance objectives and standards of success have been established for the Project. Performance standards developed for the restoration project have been guided by the Trustee Council's monitoring and long-term stewardship expectations, requirements, and mechanisms for obtaining full restoration value at NRDA restoration sites in the Portland Harbor. These standards, as well as the approach to long-term monitoring of the success of the Project are described in detail in Exhibit A.1, Appendix H.

Therefore, although this criterion does not technically apply, it will be met by the proposal.

## DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all requirements of Title 11 can be met, and that all development standards of Title 33 can be met or have received an Adjustment or Modification via a land use review, prior to the approval of a building or zoning permit.

Trees specifically approved for removal by the land use review are exempt from Title 11 Section 11.50.040 Tree Preservation Standards (11.50.040 B.5). However, the 11.50.050 On-Site Tree Density Standards must be met. The applicant's site plans indicate show that they will be planting over 20,00 trees on the site. Further, while the applicant's site plans indicate that certain trees are to be preserved in Sub-Areas 1 and 4, the plans are conceptual, and conditions of approval will be included for a Final Tree Protection Plan, consistent with Title 11, at permit time.

## CONCLUSIONS

PGE proposes to restore and enhance tributary and off-channel habitats at its Harborton Property to serve as a NRDA restoration site. Restoration activities are proposed across approximately 62 acres of the Property. The project will restore fish access to the stream so it can function as seasonally available off-channel refugia habitat for juvenile salmonids and be available as seasonal habitat for other fish species. It will create an upland soils-placement berm between the substation and the Willamette River, management of invasive plant species, and enhancement of native vegetation through installation and maintenance of native plantings.

The project will replace a failed culvert, improve the channel bed of the southern tributary, and remove reed canarygrass from the existing wetland in Sub-Area 1; excavate existing fill in Sub-Area 3 to expand off-channel habitat availability during high river stage conditions, and create a new northern tributary for fish access during all periods when stream flow is present; preserve and enhance red-legged frog habitat in Sub-Area 4 through maintaining existing

hydrology and placement of LWM; and establish/enhance native vegetation in Sub-Area 3 to improve and enrich existing and created wetland and riparian habitat types.

The applicant has provided findings for the approval criteria listed above and, with conditions, the applicable approval criteria will be able to be met.

## ADMINISTRATIVE DECISION

**Approval** of Greenway Review for the following:

- Excavation and construction of a new tributary stream channel, the northern tributary in Sub-Area 3, to re-establish a hydraulic connection to the Willamette River and eliminate the existing partial fish passage barrier caused by the berm along the river bank;
- Enhancement of fish habitat and riparian habitat in and along the new northern tributary channel through installation of large in-stream habitat wood, invasive plant species control, and installation of native riparian and wetland vegetation;
- Placement of large woody material (LWM) in wetland in Sub-Area 4 to serve as red-legged frog haul-out and basking features;
- Placement of approximately 160,700 cubic yards of excavated soils, and upland plantings, within Sub-Area 2 to create an upland berm between the new substation area and the Willamette River, and along the southeast side of the new substation;
- Removal and replacement of a failed culvert in Sub-Area 1, between the Willamette River and the southern tributary;
- Removal of invasive plant species found throughout the site, through minor excavation, herbicide application as described in Exhibit A.7, and invasive-vegetation removal, re-vegetation with native species, and routine maintenance;
- Enhancement of shoreline, riparian, and upland habitats through native re-vegetation plantings and maintenance;
- Enhancement of fish habitat and riparian habitat in and along the southern tributary in Sub-Area 1 through minor regrading of the streambed and banks, installation of large in-stream habitat wood and clean streambed substrate, invasive plant removal, and planting of native riparian and wetland vegetation;
- Removal of trees and vegetation depicted within the “Grubbing and Tree Removal Area” shown on Exhibit C.12 Clearing and Grubbing and Tree Removal Plan, and removal of Trees #1 through #12 as shown on Exhibit C.37;
- Ongoing monitoring, maintenance, and adaptive management of the restoration project as described in Exhibit A.1 Appendix H, *Portland General Electric Harborton Restoration Project: Monitoring & Adaptive Management Plan* (March 2018);

all within the Greenway overlay zones, and in substantial conformance with Exhibit A.1-Appendix H, Exhibit A.7, and graphic Exhibits C.6 through C.9, C.12 through C.14, C.16 through C.35, and C.37 as, signed and dated by the City of Portland Bureau of Development Services on **August 24, 2018**. Approval is subject to the following conditions:

- A. A BDS Zoning Permit is required for inspection of required tree protection measures and inspection of required plantings. A separate BDS construction permit is required for development** with information described in this condition in section A.1. The Conditions of Approval listed below, shall be noted on appropriate plan sheets submitted for permits (building, Zoning, grading, Site Development, erosion control, etc.). Plans shall include the following statement, ***“Any field changes shall be in substantial conformance with approved LU 18-151725 GW Exhibits C.6 through C.9, C.12 through C.14, C.16 through C.35, and C.37.”***

**BDS Construction Permits shall not be issued until the BDS Zoning Permit described**

**in Condition C below is issued.**

**BDS Construction Permits shall not be finalized until the BDS Zoning Permit for inspection of tree protection measures and mitigation plantings required in Condition C below is finalized.**

1. A final “no-rise” analysis shall be submitted with plans and specifications at the time of the construction permit review for approval by BDS Site Development staff;
  2. A geotechnical engineering report shall be provided by the applicant at the time of construction permit submittal for review and approval by BDS Site Development staff;
  3. An erosion control plan prepared by a Certified Professional in Erosion and Sediment Control (CPESC) or State of Oregon registered professional engineer shall be provided by the applicant at the time of construction permit submittal for review and approval by BDS Site Development staff.
  4. Drainage reserves shall be clearly delineated on all plans submitted for construction permit review, for review and approval by BES staff.
- B.** Three-foot high, bright orange silt-fencing shall be installed along the perimeter “Limits of Disturbance” line depicted on Exhibits C.6 through C.37. No mechanized construction vehicles are permitted outside of the approved “Limits of Disturbance” line delineated by the bright orange silt-fence. All planting work, invasive vegetation removal, and other work to be done outside the Limits of Disturbance, shall be conducted using hand held equipment.
- C.** The applicant shall obtain a BDS Zoning Permit for approval and inspection of a Final Tree Protection Plan and a Final Planting Plan.
1. The applicant shall provide a Final Tree Protection Plan, as required in Title 11 Section 11.50.070, that details how trees indicated to be preserved within areas delineated on Exhibits C.12, and in more detail on Exhibit C.37, shall be specifically protected. The Final Tree Protection Plan shall indicate temporary, bright orange construction fence at or beyond the edge of the prescriptive (or alternative) Root Protection Zone as described in 11.60.030. If the performance path (11.60.030 C.2) is used, the Final Tree Protection Plan shall be signed by a certified arborist.
  2. The applicant shall provide a Final Planting Plan for a total of 20,600 trees, 29,400 shrubs, and 83,500 emergent plugs and bulbs, in addition to native grass and forb seeding throughout the planting areas as shown on Exhibits C.33 Planting Plan, C.34 Typical Details-Planting and Seeding, and C.35 Typical Details – Planting Layout. Any plant substitutions shall be selected from the *Portland Plant List* and shall be substantially equivalent in size and form to the original plant.
    - a. The Final Planting Plans shall show:
      1. The general location of the trees, shrubs and ground covers required by this condition to be planted and labeled as “new required plantings”. The plans shall include a 40-foot by 40-foot “typical”, scalable planting layout for each planting zone, and shall illustrate a naturalistic arrangement of plants and should include a planting table listing the species, quantity, spacing and sizes of plants to be planted.
      2. The applicant shall indicate on the plans selection of either tagging plants for identification or accompanying the BDS inspector for an on-site inspection.
    - b. Plantings shall be installed between October 1 and March 31 (the planting season).
    - c. Prior to installing required plantings, non-native invasive plants shall be removed from all areas within 10 feet of mitigation plantings.
    - d. All trees removed for construction of this project, with trunks greater than 12 inches in diameter, shall be retained on the site and within Greenway overlay zone.
    - e. If plantings are installed prior to completion of construction, a temporary bright

orange construction fence shall be placed to protect plantings from construction activities.

- f. After installing the required plantings, the applicant shall request inspection of plantings and final the BDS Zoning Permit.
- g. All required shrubs and trees shall be marked in the field by a tag attached to the top of the plant for easy identification by the City Inspector; or the applicant shall arrange to accompany the BDS inspector to the site to locate mitigation plantings for inspection. If tape is used it shall be a contrasting color that is easily seen and identified.

**D. The land owner shall maintain the required plantings** for five years to ensure survival and replacement. The applicant must also restore the temporary haul road along the west, north, and east edges of Sub-Area 3 to native vegetation by the end of the five-year monitoring period. The land owner is responsible for ongoing survival of required plantings during and beyond the designated five-year monitoring period, and as allowed by the Monitoring and Adaptive Management Plan found in Exhibit A.1 Appendix H. After the 5-year initial establishment period, the landowner shall:

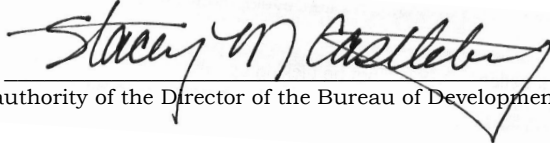
1. Obtain a Zoning Permit for a final inspection of plantings and of the Sub-Area 3 haul road removal. The applicant shall arrange to accompany the BDS inspector to the site to locate mitigation plantings for inspection. The permit must be finalized no later than 5 years from the final inspection for the installation of mitigation planting, for the purpose of ensuring that the required plantings remain and that the west, north, and east portions of the temporary haul road in Sub-Area 3 is restored to native plant communities. Any required plantings that have not survived must be replaced.
2. All required landscaping shall be continuously maintained, by the land owner in a healthy manner, with no more than 15% cover by invasive species. Required plants that die shall be replaced in kind.

**E.** Failure to comply with any of these conditions may result in the City's reconsideration of this land use approval pursuant to Portland Zoning Code Section 33.700.040 and /or enforcement of these conditions in any manner authorized by law.

**Note:** In addition to the requirements of the Zoning Code, all uses and development must comply with other applicable City, regional, state and federal regulations.

This decision applies to only the City's environmental regulations. Activities which the City regulates through PCC 33.430 may also be regulated by other agencies. In cases of overlapping City, Special District, Regional, State, or Federal regulations, the more stringent regulations will control. City approval does not imply approval by other agencies.

**Staff Planner: Stacey Castleberry**

**Decision rendered by:**  **on August 22, 2014**  
By authority of the Director of the Bureau of Development Services

**Decision mailed: August 24, 2018**

**About this Decision.** This land use decision is **not a permit** for development. Permits may be required prior to any work. Contact the Development Services Center at 503-823-7310 for information about permits.

**Procedural Information.** The application for this land use review was submitted on April 13, 2018, and was determined to be complete on June 13, 2018.

*Zoning Code Section 33.700.080* states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on April 13, 2018.



ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case, the applicant extended the 120-day review period for 30 days (Exhibit A.2). Unless further extended by the applicant, **the 120 days will expire on: November 10, 2018.**

**Some of the information contained in this report was provided by the applicant.**

As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information satisfactorily demonstrates compliance with the applicable approval criteria. This report is the decision of the Bureau of Development Services with input from other City and public agencies.

**Conditions of Approval.** If approved, this project may be subject to a number of specific conditions, listed above. Compliance with the applicable conditions of approval must be documented in all related permit applications. Plans and drawings submitted during the permitting process must illustrate how applicable conditions of approval are met. Any project elements that are specifically required by conditions of approval must be shown on the plans, and labeled as such.

These conditions of approval run with the land, unless modified by future land use reviews. As used in the conditions, the term “applicant” includes the applicant for this land use review, any person undertaking development pursuant to this land use review, the proprietor of the use or development approved by this land use review, and the current owner and future owners of the property subject to this land use review.

**Appealing this decision.** This decision may be appealed to the Hearings Officer, which will hold a public hearing. Appeals must be filed **by 4:30 PM on September 7, 2018** at 1900 SW Fourth Ave. Appeals can be filed at the 5<sup>th</sup> floor reception desk of 1900 SW 4<sup>th</sup> Avenue Monday through Friday between 8:00 am and 4:30 pm. **An appeal fee of \$250 will be charged.** The appeal fee will be refunded if the appellant prevails. There is no fee for ONI recognized organizations appealing a land use decision for property within the organization’s boundaries. The vote to appeal must be in accordance with the organization’s bylaws. Assistance in filing the appeal and information on fee waivers is available from BDS in the Development Services Center. Please see the appeal form for additional information.

The file and all evidence on this case are available for your review by appointment only. Please call the Request Line at our office, 1900 SW Fourth Avenue, Suite 5000, phone 503-823-7617, to schedule an appointment. I can provide some information over the phone. Copies of all information in the file can be obtained for a fee equal to the cost of services. Additional information about the City of Portland, city bureaus, and a digital copy of the Portland Zoning Code is available on the internet at [www.portlandonline.com](http://www.portlandonline.com).

**Attending the hearing.** If this decision is appealed, a hearing will be scheduled, and you will be notified of the date and time of the hearing. The decision of the Hearings Officer is final; any further appeal must be made to the Oregon Land Use Board of Appeals (LUBA) within 21 days of the date of mailing the decision, pursuant to ORS 197.620 and 197.830. Contact LUBA at 775 Summer St NE, Suite 330, Salem, Oregon 97301-1283, or phone 1-503-373-1265 for further information.

Failure to raise an issue by the close of the record at or following the final hearing on this case, in person or by letter, may preclude an appeal to the Land Use Board of Appeals (LUBA) on that issue. Also, if you do not raise an issue with enough specificity to give the Hearings Officer an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

**Recording the final decision.**

If this Land Use Review is approved the final decision will be recorded with the Multnomah County Recorder.

- *Unless appealed*, the final decision will be recorded on or after **September 10, 2018** by the Bureau of Development Services.

The applicant, builder, or a representative does not need to record the final decision with the Multnomah County Recorder.

For further information on your recording documents please call the Bureau of Development Services Land Use Services Division at 503-823-0625.

**Expiration of this approval.** An approval expires three years from the date the final decision is rendered unless a building permit has been issued, or the approved activity has begun.

Where a site has received approval for multiple developments, and a building permit is not issued for all of the approved development within three years of the date of the final decision, a new land use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time. Zone Change and Comprehensive Plan Map Amendment approvals do not expire.

**Applying for your permits.** A building permit, occupancy permit, or development permit may be required before carrying out an approved project. At the time they apply for a permit, permittees must demonstrate compliance with:

- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations of the City.

### EXHIBITS

NOT ATTACHED UNLESS INDICATED

#### A. Applicants' Statements

1. PGE Harborton Restoration-Greenway Review Application (June 13, 2018); with Appendices:  
Appendix A – BDS - Early Assistance Summary Memos  
Appendix B – Reference Maps  
Appendix C – Engineering Plan Set  
Appendix D – Contaminated Media Management Plan  
Appendix E – No Rise Analysis  
Appendix F – Cut-Fill Balance Variance Approval  
Appendix G – Geotechnical Engineering Report  
Appendix H – Monitoring and Adaptive Management Plan (approved)
2. 30-Day Extension Request
3. Applicants' July 31, 2018 response to City review comments
4. Harborton Cut and Fill Addendum
5. DEQ Beneficial Use Determination
6. Harborton Hydrology and Hydraulics report
7. Harborton herbicide standards for invasive species control
8. Applicants' response to incomplete letter

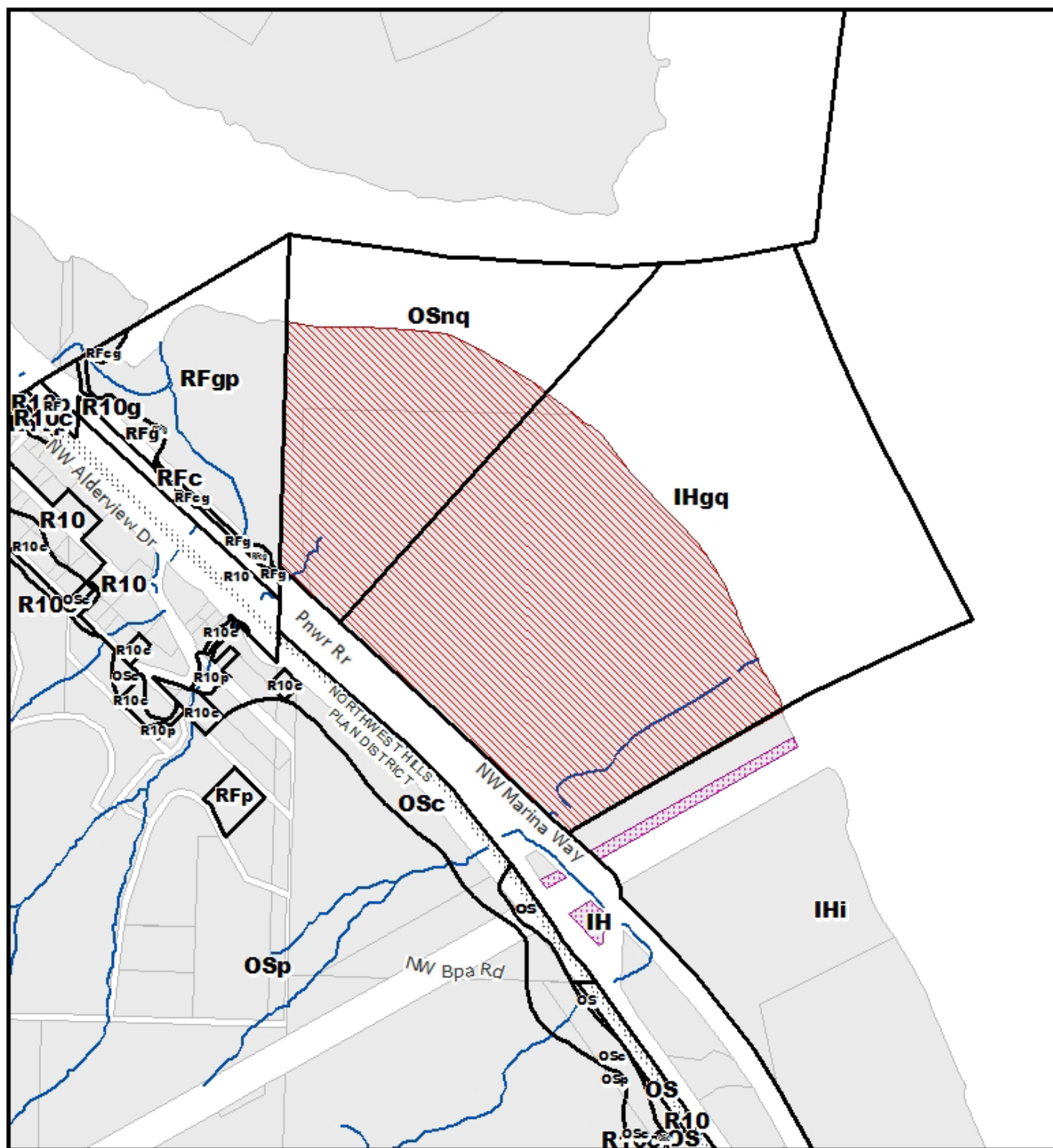
#### B. Zoning Map (attached)

#### C. Plans/Drawings:

- 1 - Cover Sheet, Location and Site Maps, and Drawing Index
- 2 - General Notes
- 3 - Existing Conditions
- 4 - Existing Land Use Overview

- 5 - Erosion, Sediment, and, Pollution Control Notes
- 6 - Erosion, Sediment, and, Pollution Control Plan-- Pre Construction (attached)
- 7 - Erosion, Sediment, and, Pollution Control Plan - Active Construction (attached)
- 8 - Erosion, Sediment, and, Pollution Control Details· Sheet 1
- 9 - Erosion, Sediment, and, Pollution Control Details· Sheet 2
- 10 - Site Plan and Known Utilities
- 11 - Site Utilities Demolition and Improvements Plan
- 12 - Clearing and Grubbing and Tree Removal Plan (staff-modified) (attached)
- 13 - Dewatering Plan
- 14 - Subgrading Plan (attached)
- 15 - Subgrading Plan - Proposed North Channel
- 16 - Subgrading Cross-Sections· Pro Posed North Channel
- 17 - Subgrading Cross-Sections· Proposed North Channel
- 18 - Subgrading Cross-Sections· Proposed North Channel
- 19 - Plan and Profile - Pro Posed North Channel
- 20 - Finished Grade Cross-Sections· North Channel
- 21 - Finished Grade Cross-Sections - North Channel
- 22 - Finished Grade Cross-Sections · North Channel
- 23 - Typical Details (attached)
- 24 - Grading Plan - Fill Area
- 25 - Grading Cross-Sections - Fill Area
- 26 - Grading Cross-Sections - Fill Area
- 27 - Plan and Profile· Proposed South Channel
- 28 - Construction Cross-Sections - South Channel
- 29 - Plan and Details - Culvert Replacement (staff-modified) (attached)
- 30 - Plan View· Habitat Features (attached)
- 31 - Typical Details and Notes· Habitat Features (Sheet 1)
- 32 - Typical Details and Notes - Habitat Features (Sheet 2)
- 33 - Planting Plan (attached)
- 34 - Typical Details· Planting and Seeding (attached)
- 35 - Typical Details -Planting Layout
- 36 - Lower Willamette Habitat Ranking
- 37 - Sub Area 1 Tree Removal Plan (attached)
- D. Notification information:
  - 1. Mailing list
  - 2. Mailed notice
- E. Agency Responses:
  - 1. Bureau of Environmental Services
  - 2. Bureau of Transportation Engineering and Development Review, Water Bureau Fire Bureau
  - 3. Site Development Review Section of BDS
  - 4. Live Safety Review Section of BDS
- F. Correspondence:
  - 1. Linnton Neighborhood Assn; July 12, 2018 e-mailed message; concerns with impacts on red-legged frog habitat.
- G. Other:
  - 1. Original LU Application

**The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).**



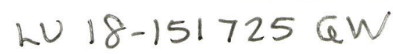
# ZONING



- Site
- Also Owned Parcels
- Stream

File No.	LU 18-151725 GW
1/4 Section	1717,1718,1817,1818
Scale	1 inch = 600 feet
State ID	2N1W34 300
Exhibit	B Apr 17, 2018

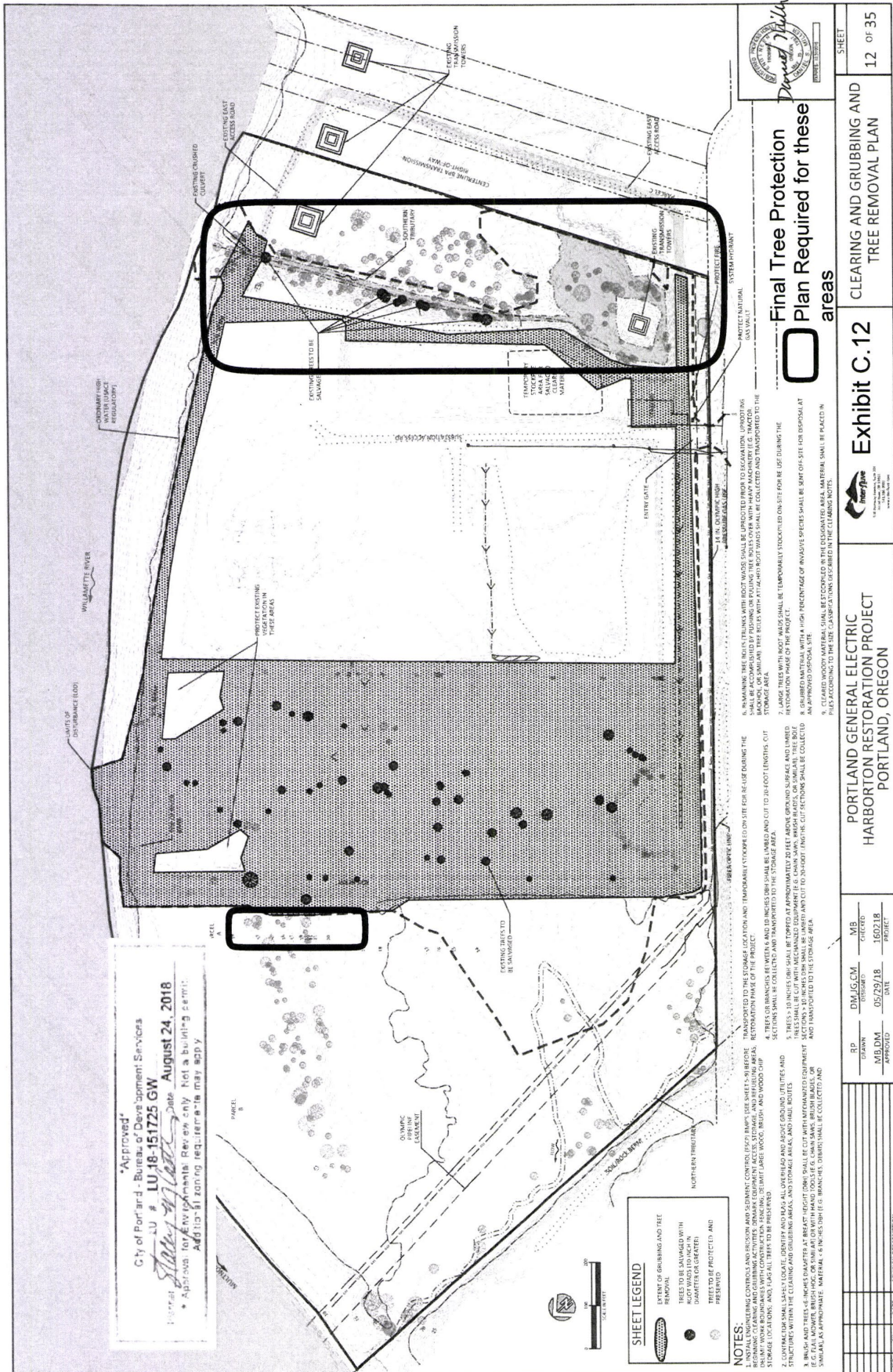






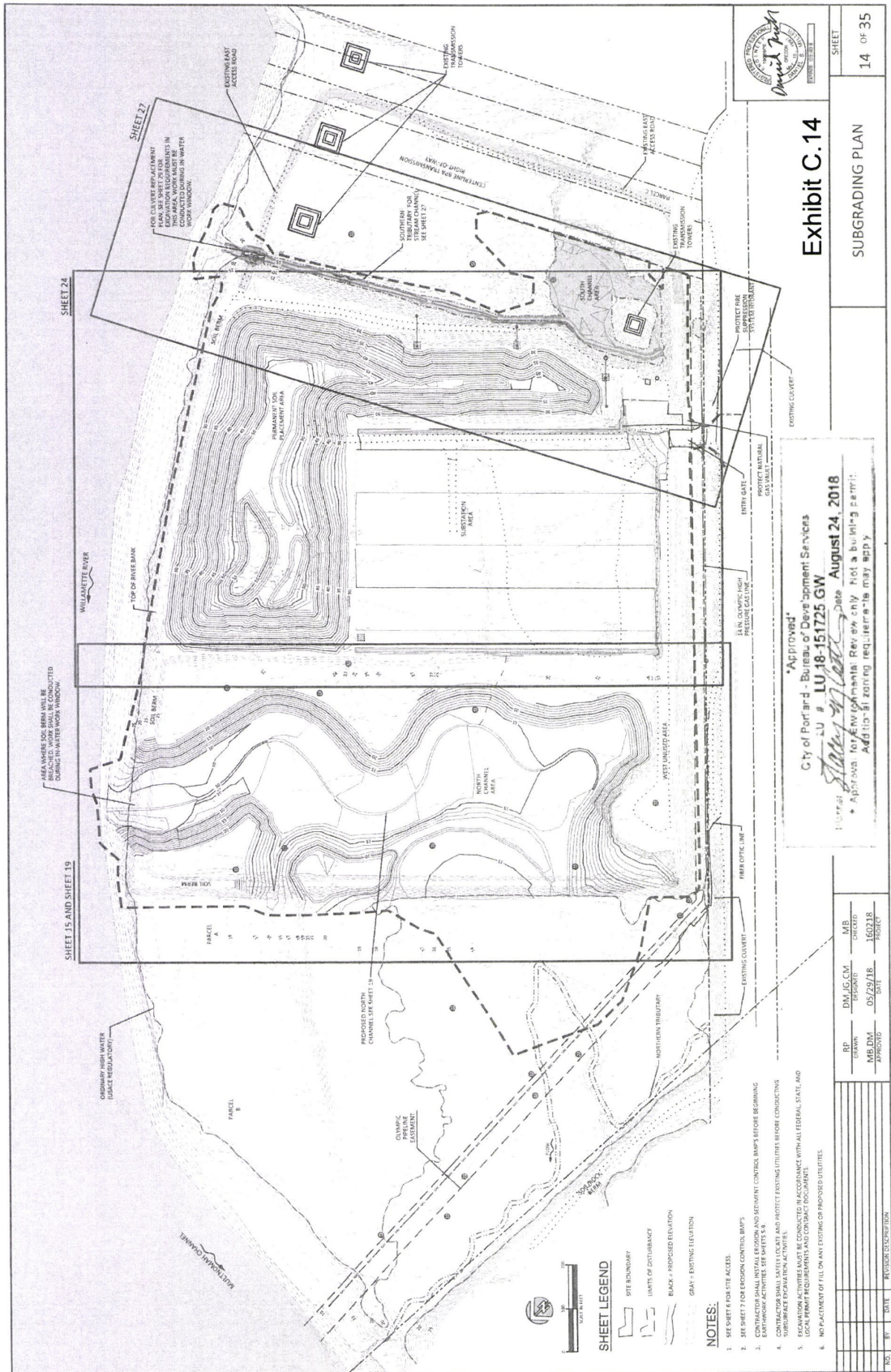






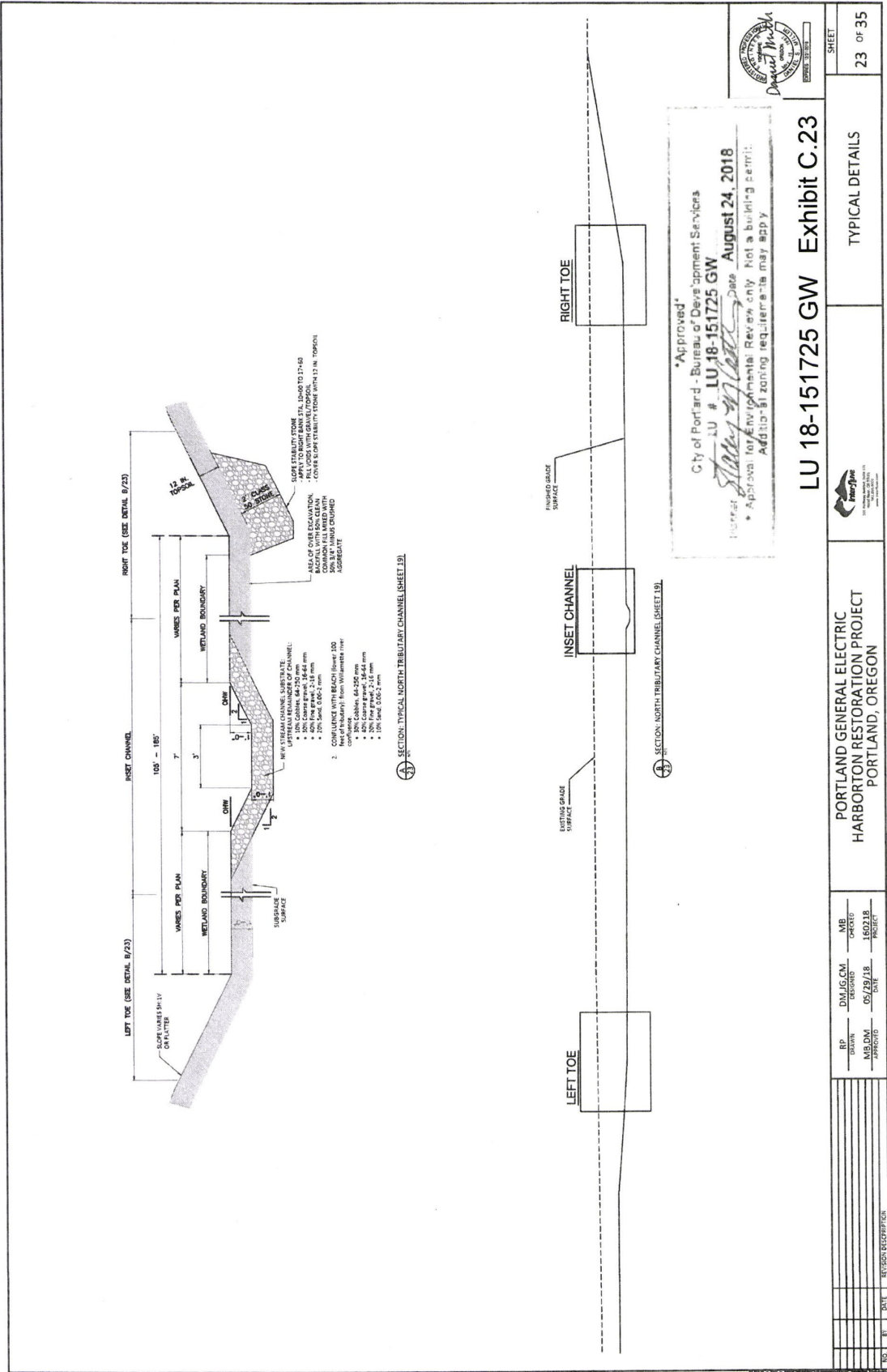
LU 18-151725 GW





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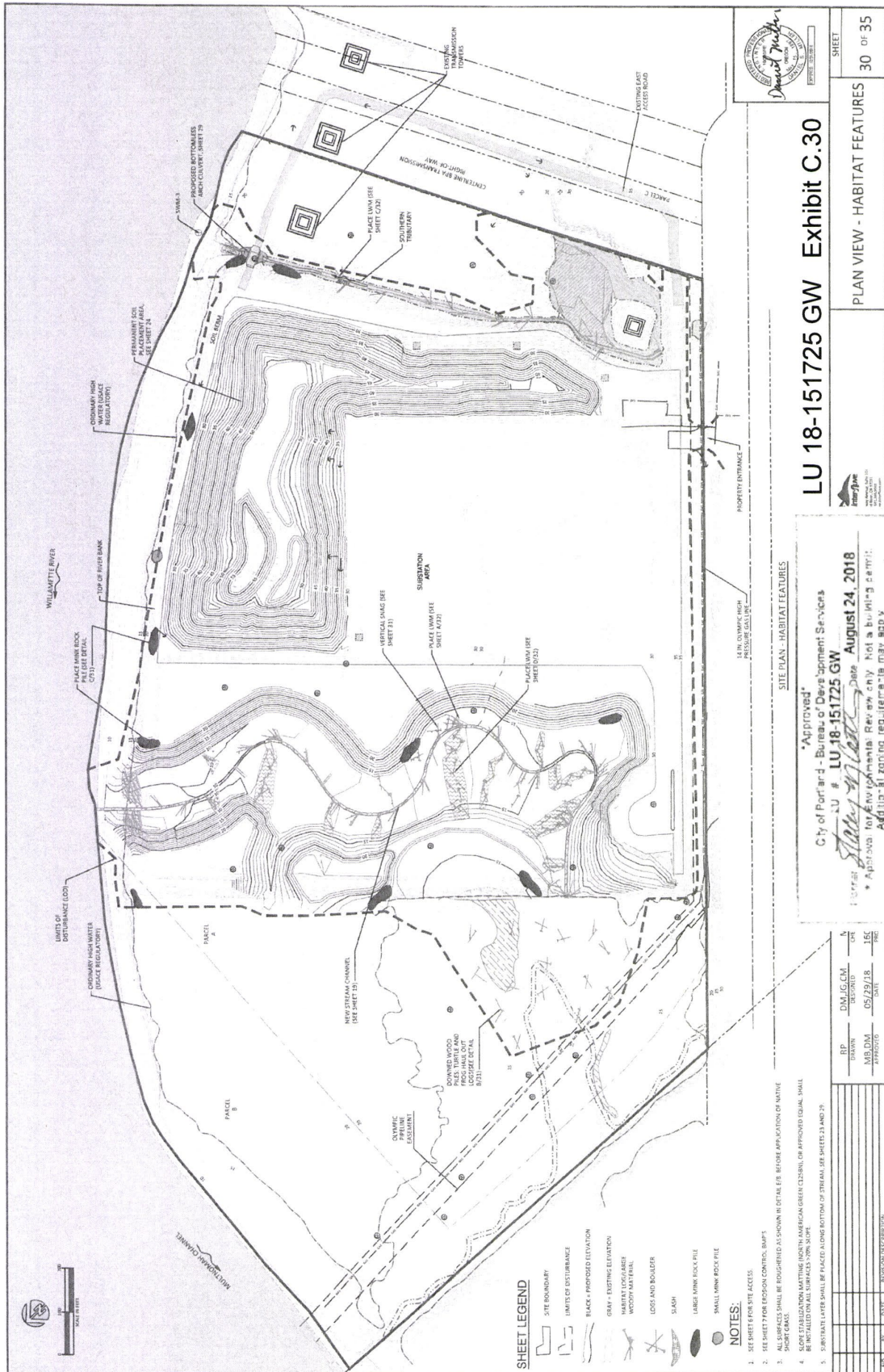




LU 18-151725 GW







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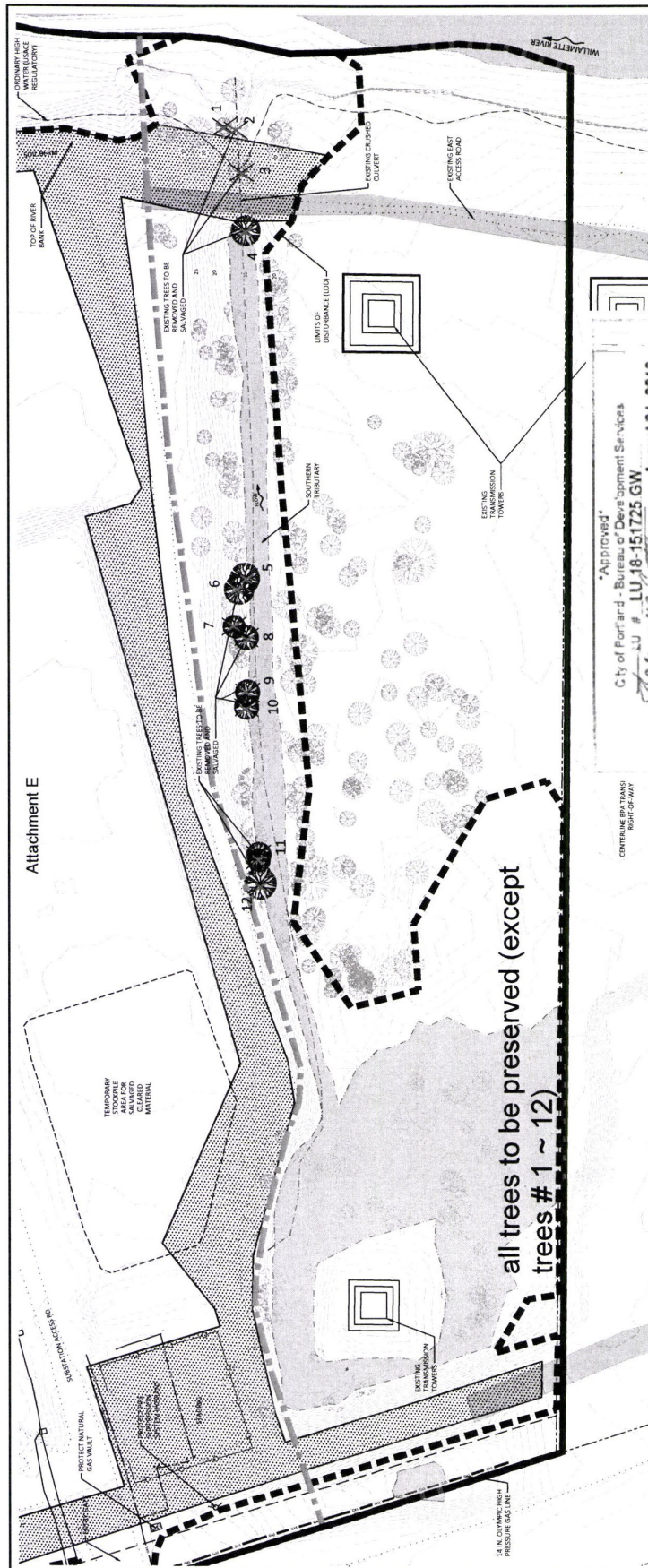












all trees to be preserved (except trees # 1 ~ 12)

\* Approved\*  
City of Portland - Bureau of Development Services  
LU # LU 18-151725 GW  
Submitted Stacy West Date August 24, 2018  
\* Approval for Environmental Review only. Not a building permit.  
Additional zoning requirements may apply.

Trees to be Retained and Relocated		Urban Forest - Sub-Area 1	
No.	Tree(s) (DBH)	Species	Common Name
1	12	Salix glauca	Gray willow
2	20	<i>Populus balsamifera</i> ssp. <i>richardsonii</i>	black cottonwood
3	24	<i>Populus balsamifera</i> ssp. <i>richardsonii</i>	black cottonwood
4	8	<i>Alnus incana</i>	red alder
5	18	<i>Populus balsamifera</i> ssp. <i>richardsonii</i>	cottonwood
6	7	<i>Populus balsamifera</i> ssp. <i>richardsonii</i>	cottonwood
7	12	<i>Populus balsamifera</i> ssp. <i>richardsonii</i>	cottonwood
8	14	<i>Populus balsamifera</i> ssp. <i>richardsonii</i>	cottonwood
9	12	<i>Populus balsamifera</i> ssp. <i>richardsonii</i>	cottonwood
10	16	<i>Populus balsamifera</i> ssp. <i>richardsonii</i>	cottonwood
11	12	<i>Populus balsamifera</i> ssp. <i>richardsonii</i>	cottonwood
12	12	<i>Populus balsamifera</i> ssp. <i>richardsonii</i>	cottonwood

Harbort on : Sub-Area 1

6. REMAINING TREE TRUNKS WITH ROOT WADS SHALL BE UNROOTED PRIOR TO EXCAVATION. UNROOTING SHALL BE ACCOMPLISHED BY PUSHING OR PULLING TREE BOLTS OVER WITH HEAVY MACHINERY (E.G. TRACTOR, BACKHOE, ETC.). TREE BOLTS WITH A PULLED ROOT WAD SHALL BE COLLECTED AND TRANSPORTED TO THE STORAGE AREA.

7. LARGE TREES WITH ROOT WADS SHALL BE TEMPORARILY STOCKPILED ON-SITE FOR RE-USE DURING THE RESTORATION PHASE OF THE PROJECT.

8. SUBMITTED MATERIALS WITH A HIGH PERCENTAGE OF INVASIVE SPECIES SHALL BE SENT OFF-SITE FOR DISPOSAL AT AN APPROVED DISPOSAL SITE.

9. PLANTED AND NATURAL SPECIES SHALL BE STOCKPILED IN THE DESIGNATED AREA. MATERIAL SHALL BE PLACED IN PILES OR CONTAINERS ACCORDING TO THE SPECIES CLASSIFICATIONS DESCRIBED IN THE CLEANING NOTES.

NOTES:

- [illegible]



AS	AV	1. EQUIPMENT AND MATERIALS TO BE SUPPLIED BY CONTRACTOR	CONTRACTOR'S ADDRESS
LU 18-151725 GW	Ex. C.37		

## CLEARING AND GRUBBING AND TREE REMOVAL PLAN

PORTLAND GENERAL ELECTRIC  
HARBOR RESTORATION PROJECT  
PORTLAND, OREGON

RP	DM,JG,CM	MB
DRAWN	DESIGNED	CHECKED
MB,DM	05/29/18	160218
APPROVED	DATE	PROJECT

[illegible]

SHEET  
12A OF 35

LU 18-151725 GW



[Home](#) / [Council Documents](#)

# 191314

Ordinance

## Authorize Portland Parks & Recreation to establish and collect fees in-lieu of mitigation activities to implement restoration projects in natural areas

Passed

The City of Portland ordains:

Section 1. The Council finds:

1. Portland Parks & Recreation (PP&R) provides safe places, facilities, and programs that promote physical, mental, and social activity. PP&R programs establish, safeguard, and restore parks, natural areas, and public places.
2. The City Nature team within PP&R is charged with the care and stewardship of natural areas including Forest Park. Healthy natural areas keep Portland's land and water healthy and support the City's climate resilience goals. Vegetation in sloped natural areas prevents land slumping and landslides that can impact both public and private property. Trees in forested natural areas keep the air healthy. Natural areas can mitigate flooding by storing water in floodplains and reducing the amount of water entering streams during rain events. Forested areas also sequester carbon and mitigate high temperature events.
3. Forest Park is a 5,200-acre natural area that provides critical refuge for hundreds of native wildlife and plant species and provides important air and water quality benefits. Forest Park contains more than 80 miles of trails and provides access to nature, recreation, and educational opportunities for the region. There is also an extensive network of existing infrastructure within the park, including electrical and natural gas transmission facilities, public roads, and other utility facilities.
4. There are a number of existing utility easements that run through Forest Park, held by Portland General Electric (PGE), Bonneville Power Administration (BPA), Kinder Morgan, and NW Natural Gas. The infrastructure associated with these easements requires ongoing maintenance or additional development which can result in natural resource impacts. Infrastructure projects such as Oregon Department of Transportation (ODOT) and Portland Bureau of Transportation

Introduced by

[Commissioner Dan Ryan](#)

Bureau

[Parks & Recreation](#)

Contact

Kendra Petersen-Morgan

Natural Areas Supervisor

✉ [kendra.petersen-morgan@portlandoregon.gov](mailto:kendra.petersen-morgan@portlandoregon.gov)

📞 [503-823-4492](tel:503-823-4492)

Requested Agenda Type

Regular

Date and Time Information

Requested Council Date

June 7, 2023

Portland Policy Document

- (PBOT) road maintenance within or adjacent to Forest Park can also cause ecological impacts.
5. The land and natural resources within Forest Park are protected by the Environmental overlay zones provided in Title 33 and the Forest Park Natural Resource Management Plan (NRMP), administered by the Bureau of Development Services (BDS). These zoning and NRMP regulations require mitigation plans for ecological impacts in the areas where they are applied. Additionally, PP&R requires a Non-Parks Use Permit for work in PP&R-managed areas to ensure that ecological and recreation impacts are minimized and mitigated.
  6. Currently, required mitigation is performed by the entity causing the impact. Due to conditions in Forest Park and the complexity of conducting comprehensive restoration in Forest Park, large-scale mitigation provided to off-set infrastructure maintenance or other development is often unsuccessful and does not meet the goals of the Forest Park Natural Resources Management Plan, resulting in a net loss to City natural resources.
  7. To address this, PP&R proposes to establish an optional in-lieu fee which would allow PP&R to receive mitigation funds from applicants as the alternative for the applicants conducting mitigation activities within Forest Park. PP&R would utilize this in-lieu fee to implement restoration projects within the same management unit of the park where impacts occurred, in order to mitigate for those impacts. Funds will be part of the Forest Park Trust Fund and will be spent within five (5) years of receipt, unless good cause is determined by the Director to extend the time for use. PP&R will provide annual reporting to BDS on the status of the funds spent and mitigation accomplished. When a mitigation plan is required in Title 33 or the NRMP, PP&R will demonstrate how the mitigation in-lieu fee satisfies the required mitigation.
  8. To implement this in-lieu fee, it is necessary for City Council to adopt a fee schedule which sets out the required fees per tree to be removed within Forest Park. This mitigation in-lieu fee schedule is Exhibit A to this ordinance.


NOW, THEREFORE, the Council directs:

- A. Portland Parks and Recreation is authorized to establish and collect fees in-lieu of mitigation for impacts in Forest Park, which will be utilized to implement mitigation and conduct monitoring and maintenance not for the design of mitigation plans nor general staffing costs.
- B. Adoption of the Fee Schedule listed as Exhibit A to this ordinance shall be effective May 31, 2023. The Fee Schedule may be increased each fiscal year in accordance with City Economist's recommendation and the annual supplemental Fee Schedule will be filed by Portland Parks and Recreation and thereafter incorporated as part of the policy.



C. This ordinance is binding City policy.

## Documents and Exhibits

 [Exhibit A \(https://www.portland.gov/sites/default/files/council-documents/2023/exhibit-a\\_3.pdf\)](https://www.portland.gov/sites/default/files/council-documents/2023/exhibit-a_3.pdf) 98.98 KB

An ordinance when passed by the Council shall be signed by the Auditor. It shall be carefully filed and preserved in the custody of the Auditor (City Charter Chapter 2 Article 1 Section 2-122)

Passed by Council  
June 7, 2023

Auditor of the City of Portland  
Simone Rede

## Impact Statement

### Purpose of Proposed Legislation and Background Information

Forest Park, a 5,200-acre natural area managed by PP&R, provides critical refuge for hundreds of native wildlife and plant species and provides important air and water quality benefits. With more than 80 miles of trails, it also provides invaluable access to nature, recreation, and educational opportunities for the region. Further, an extensive network of existing infrastructure currently exists within the park, including electrical and natural gas transmission facilities, public roads, and other utility facilities. The park is protected by the Environmental Zones set forth in Title 33, the City's Zoning Code, and the Forest Park Natural Resources Management Plan (NRMP) to preserve the highest valued natural resources of the City.

Currently there are eight different utility easements running through Forest Park. These utility easements are held by Portland General Electric (PGE), Bonneville Power Administration (BPA), Kinder Morgan, and NW Natural Gas. The infrastructure associated with these easements requires ongoing maintenance or additional infrastructure which can result in natural resource impacts that require mitigation. Additionally, infrastructure projects such as Oregon Department of Transportation (ODOT) and Portland Bureau of Transportation (PBOT) road maintenance within or adjacent to Forest Park may require mitigation to offset ecological impacts. When work must occur on land protected by the Environmental Zones, the projects are reviewed through the Environmental Review land use process with the Bureau of Development Services (BDS) to ensure that the applicable criteria of the Portland Zoning Code (Title 33) and the Forest Park NRMP are met, including that any unavoidable impacts to natural resource and functional values are offset by appropriate mitigation. Additionally, PP&R requires a Non-Parks Use Permit for work in Forest Park to ensure that ecological and recreation impact is minimized as practicable.

To receive a permit under either process, an applicant is required to mitigate impacts to the park. PP&R and BDS review mitigation proposals and provide technical input, while the applicant is responsible for carrying out the mitigation activities.

This current system is challenging for both the City and applicants for a multitude of reasons. First, it requires PP&R land managers with technical expertise to direct a third party to carry out mitigation activities in compliance with the park's natural resources management plan. This process requires considerable communication between the parties and offers many opportunities for misinterpretation and/or non-compliance with City requests or requirements. To achieve optimal mitigation results, PP&R land managers have found that an extensive series of communications, site visits, inspections, and feedback is required to achieve the desired results. Standard Environmental Zoning Code mitigation requirements typically require applicants to plant trees. As a result, much of the mitigation currently being implemented involves revegetation with tree species. However, due to the nature of Forest Park and its abundance of forest canopy, revegetation with trees only does not always meet the highest ecological need for mitigating site impacts from construction and maintenance. Instead, comprehensive restoration over large areas, including the removal of invasive species and revegetation with shrubs and forbs, is mitigation more readily needed in the park. Third-party applicants often are not equipped to carry out this nuanced restoration work. Additionally, as our climate changes, selective pruning and creation of defensible space in the wildland urban interface is becoming increasingly necessary to reduce wildfire risk. Currently, under a programmatic permit from Urban Forestry, Land Stewardship is the responsible party for all activities in the permit, including wildfire risk reduction techniques, which means that it is beneficial for Land Stewardship to directly carry out that mitigation to ensure permit compliance.

BDS and PP&R are proposing an alternate approach that has the support of stakeholders. This alternate approach would, for qualifying projects, authorize PP&R to receive Title 33 mitigation funds from applicants in lieu of the applicants conducting mitigation themselves. PP&R would then utilize this funding to implement required mitigation, reducing inefficiencies associated with applicant-led mitigation. To carry out this process, PP&R site ecologists would submit a mitigation plan to BDS environmental land use review staff for each proposed impact. BDS would review those mitigation plans and, if approved, would include them in the land use approval for the project.

Fees would be collected by PP&R from the applicant and directed into the Forest Park Trust Fund. The Forest Park Trust Fund has three internal orders for each management unit of the park: the south, central and north units. Funds will be directed into each management unit where the impact occurred and would have to be spent in those units as described in the mitigation plan.

Under the proposed approach, fees would be calculated based on existing fees for tree planting and removal under Title 11, the City's tree code. The Environmental Review Land Use Process generally requires mitigation for impacts to trees 6 inches diameter at breast height (dbh) and larger. Title 11 tree removal in-lieu fees apply to trees at least 12 and less than 20 inches dbh, as well as for trees 20 inches and larger dbh. Title 11 also establishes a planting in-lieu fee which is a fee per tree. Table 1 below proposes to apply the per-tree fee for trees at least 6 and less than 12 inches dbh. For removal of trees at least 12 and less than 20 inches dbh, as well as for trees 20 inches and larger dbh, the corresponding tree removal in-lieu fee from the Title 11, Trees fee schedule would apply. The total number and diameter of trees 6 inches or greater dbh to be removed would be used to calculate a total fee for mitigation. These funds would be utilized to inform the total mitigation budget and inform the mitigation plan. The mitigation plan will include such actions as revegetation of both trees and shrubs, and invasive species removal. It may include wildfire risk reduction where appropriate. The mitigation plan will include a descriptive narrative, timeline, and proposed acreage to which the mitigation will be applied. As required by the Forest Park Natural Resource Management Plan, all mitigation actions will be applied to the management unit (South, Central or North) where the impact occurred.

The alternative approach will reduce inefficiencies for both the City and applicants to accomplish more ecologically beneficial mitigation. It will simplify process and improve outcomes from that associated with applicant-led mitigation. It will ultimately result in more comprehensive and sustainable ecological restoration, as technically knowledgeable PP&R staff who are managing broader-scale ecological management of Forest Park would be planning, implementing and maintaining the mitigation rather than a third-party applicant.

Table 1: Fee structure based on tree diameter

Tree diameter	Fee
≥6 and <12 inches	\$675 per tree
≥12 and <20 inches	\$1,800 per tree
≥20 inches	\$450 per inch

Financial and Budgetary Impacts

The funds will be used to pay for mitigation for environmental impacts in and adjacent to Forest Park. Funds will be part of the Forest Park Trust Fund and earmarked for the specific management unit where the impact occurred. There is no budgetary impact for the current fiscal year. Budget development each year will include spending down approximately \$200K/year to pay for all expenses associated with mitigation activities. Funds received will be spent within five (5) years of receipt and PP&R will provide annual reporting to BDS on the status of funds spent and mitigation accomplished.

## Community Impacts and Community Involvement

These funds will allow PP&R to do restoration and fuels management work that will help reduce wildfire risk and help meet the City's climate goals, enhance ecological health, and protect wildlife habitat. Engagement with the community has included outreach to the Forest Park Conservancy, Forest Park Neighborhood Association, and Portland Audubon. Additionally, infrastructure easement holders in Forest Park as well as current applicants have been apprised of this proposal through BDS. At this time, PP&R has received positive response both from the community and from potential applicants.

## 100% Renewable Goal

N/A

## Budget Office Financial Impact Analysis

This action allows Portland Parks & Recreation (PPR) to transition to a fee-based structure for mitigation activities in natural areas. This new structure would allow PP&R to receive title 33 mitigation funds in lieu of applicants conducting mitigation themselves. The fee structure is based upon diameter of trees within impacted areas. PP&R estimates fees collected to be approximately \$200,000 a year which will be directed to pay for in-house mitigation activities.

## Agenda Items

**441 Regular Agenda in [May 31-June 1, 2023 Council Agenda](https://www.portland.gov/council/agenda/2023/5/31)**  
(<https://www.portland.gov/council/agenda/2023/5/31>)

Rescheduled

Rescheduled to June 1, 2023 at 2:00 p.m.

**454 Regular Agenda in [May 31-June 1, 2023 Council Agenda](https://www.portland.gov/council/agenda/2023/5/31)**  
(<https://www.portland.gov/council/agenda/2023/5/31>)

Passed to second reading

Passed to second reading June 7, 2023 at 2:00 p.m.

**476 Regular Agenda in [June 7-8, 2023 Council Agenda](https://www.portland.gov/council/agenda/2023/6/7)**  
(<https://www.portland.gov/council/agenda/2023/6/7>)

Passed

Commissioner Dan Ryan Yea

Commissioner Rene Gonzalez Yea

Commissioner Mingus Mapps Absent

Commissioner Carmen Rubio Yea

Mayor Ted Wheeler Yea



**PORTLAND PARKS & RECREATION**  
Healthy Parks, Healthy Portland



# Forest Park Wildlife Report

December 2012



# **Forest Park Wildlife Report**

## **December 2012**

### **Author**

John Deshler

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Mike Abbaté, Director

Deb Lev, City Nature Manager

Astrid Dragoy, City Nature Zone Manager

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Char Corkran, Wildlife Consultant, author

Dave Helzer, Environmental Specialist, Bureau of Environmental Services

Jim LaBonte, Taxonomic and Survey Entomologist, Oregon Department of Agriculture

Anita Morzillo, Assistant Professor, Forest Ecosystems and Society, Oregon State University

### **Technical Editor**

Judy Jewell

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Portland, OR 97204  
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[www.PortlandParks.org](http://www.PortlandParks.org)  
Commissioner Nick Fish  
Director Mike Abbaté



*Sustaining a healthy park and recreation system to make Portland a great place to live, work and play.*

James Allison	Eric Forsman	Chris Looney	Laura Roberts
Cherry Amabisca	Andy Frank	Chad Marks-Fife	Arnie Rochlin
Brendon Boudinot	Jerry Fugate	Chris Marshall	Emily Roth
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Steve Engel	Jason Law	Kristie Reddick	Alan Yeakley
Rachel Felice	Deb Lev	Dan Richardson	Meghan Young
Shawneen Finnegan	Nathan Lichti	Robert Richardson	

Coastal cutthroat trout, Melissa Brown  
Coastal giant salamander, John Deshler  
*Haplotrema vancouverense*, Bruce Marcot  
Wilson's warbler, Scott Carpenter  
*Pterostichus lama*, Jim LaBonte  
Spotted skunk, Dan Richardson  
*Heptageniid*, Patrick Edwards  
Douglas squirrel (*Tamiasciurus douglasii*)



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*Red-legged frog*

# Executive Summary

## Introduction and Objectives

The primary objectives of this report are to provide both a broad description of Forest Park wildlife and detailed species information based on the best available data, whether historical, recent, anecdotal, or rigorously collected via research. Other major goals of this report are to

- identify gaps in our wildlife knowledge,
- identify threats to wildlife, and
- define next steps in the research and management of wildlife that could close important gaps and mitigate threats.

Interest in Forest Park wildlife began with the park's founding, and the goal of preserving and attracting wildlife was emphasized in the *Forest Park Natural Resources Management Plans* (1976, 1995) and the *Forest Park Ecological Prescriptions* (2011). Wildlife concerns in the park came to the forefront in 2010 during meetings about potentially increasing recreational trails in the park.

## Park Description and Key Wildlife Habitat Components

Forest Park is a 5,100-acre forested preserve, and is divided into three management units: south, central, and north. Per the 1995 *Forest Park Natural Resources Management Plan*, wildlife and ecological concerns are a priority throughout the park, and the balance of recreation and wildlife concerns follows a gradient such that recreation is of a higher priority in the south unit than in the north.

The park forms a narrow extension of Oregon's Coast Range. The park is bounded by urban, rural, and industrial development and somewhat fragmented by roads and powerline corridors. Park wildlife are therefore a combination of species that are native to the Coast Range ecosystem and other species that are associated with human disturbance. *Interior Forest*, a Special Status Habitat in the Portland metropolitan area, dominates the park landscape. The most abundant and well-distributed vertebrate species in the park are associated with forest interior habitat. Seven major streams cut the full width of the park; a few are perennial and support fish and aquatic mollusks.

Wildlife habitat in the park has been influenced by historical logging and fires. These disturbances created a patchwork of deciduous, coniferous, and mixed stands, which affects wildlife distributions. Some terrestrial wildlife species are associated with

either coniferous or deciduous habitat. Fire and logging have not recurred since soon after the park was created. Forest regrowth in the past 65 years has produced a mature canopy throughout the park, excluding the powerline corridors. As the forest matured, species such as the pileated woodpecker returned. Powerline corridors are dominated by native shrubs and ground cover and are habitat for shrub-nesting birds, grazing mammals, insectivores, and pollinators such as hummingbirds, beetles, bees, and bats. Habitat alteration beyond the park boundary continues today and affects the ability of terrestrial mammals to disperse and immigrate, and reduces foraging habitat for some species. Some species are no longer present due to habitat alterations.

Late-successional conifer stands containing old-growth remnants occur in all units. Mature conifer forests are structurally complex ecosystems and are important for many native wildlife species. Older stands tend to hold a greater abundance of key wildlife habitat components including standing dead trees (snags), large broken-top trees, and fallen trees (coarse woody debris). These structures are important to all wildlife classes.

### Wildlife Information

Most of the wildlife information for Forest Park comes from the past 17 years during which many graduate student research projects; federal, state, and city agency research efforts; and citizen science surveys have provided great insight into the diversity, relative abundance, distribution, and population trends of park wildlife. Valuable information on park wildlife and habitat are also found in historical documents, such as the writings of Lewis and Clark and the 1901 *Park Commission Report*, as well as reports, research, and observational accounts from the intermediate past, 1980–1995.

For each wildlife species the focus has been on the following qualities:

- Presence or absence
- Breeding status
- Relative abundance
- Distribution
- Special-status concerns

Vertebrate wildlife diversity is dominated by 104 avian and 45 mammalian species; of these about 30% have been identified by the City of Portland as Terrestrial Ecology Enhancement Strategy (TEES) Special Status Species and few are non-native. However,



many bird and mammal species are only seasonally present, rare, or nocturnal, or occur naturally at low density, and are seldom experienced by park visitors. In contrast to birds and mammals, few species of amphibian, reptile, and fish inhabit the park. All the fish, reptiles, and amphibians that do occur in the park are native species. The amphibian species tend to be well-distributed, abundant residents. Among vertebrate species, eight are federal species of concern, one is threatened, and the northern spotted owl is federally endangered.

A variety of methods have been used to catalog mammalian diversity in the park including capture-based research, motion-detection camera surveys, owl prey analyses, and observational accounts by park staff, users, and neighbors. About two-thirds of the 65 mammal species known to occur in Oregon's Coast Range are also known to occur in Forest Park, and about 30 species breed there; 19 mammalian species are considered abundant and well-distributed in the park and most of these are small terrestrial mammals. Mammalian diversity in the park is dominated by bats, rodents, and carnivores. Most of the park's mammalian wildlife species are some combination of nocturnal, small, arboreal (tree-dwelling), or fossorial (burrowing), and are seldom seen by park visitors. Exceptionally, the Douglas squirrel and Townsend's chipmunk are common diurnal mammals often seen near trails. Two of the most abundant mammals are the deer mouse and Trowbridge's shrew, and these are important food resources for many carnivores and owls. In contrast, some large rodent and carnivore species, such as the porcupine and black bear, are rarely found in the park. Deer and elk occur in the park, but only deer are common year-round residents. Elk occur seasonally, typically in low numbers, and appear to rely heavily on external resources beyond the park perimeter for foraging and breeding. Most of the bat species that occur or may occur in the park are special-status species. However, the distribution, abundance, breeding status, circannual patterns, and habitat use of bats in Forest Park is poorly understood. The few non-native mammals are rats and squirrels, and these are typically found near the residential park perimeter. Some other mammalian species—particularly woodrats, tree voles, and pocket gophers—are considered absent from the park though they are at least somewhat likely to occur based on forest and riparian habitat associations. The red tree vole and the dusky-footed and bushy-tailed woodrats are candidates for reintroduction.



*Hillside north of Balch Creek*

## Executive Summary



*Robin's nest*

Information on birds in Forest Park comes from the Portland Christmas Bird Count, natural areas management reports, academic research projects, the Bureau of Environmental Services stream monitoring, citizen science projects, local bird and wildlife experts, and the U.S. Fish and Wildlife Service bald eagle monitoring program. A dozen bird species are rare and many others are uncommon. Birds are the most conspicuous wildlife class because they are vocal, diurnally active, and abundant. The sights and sounds of up to three dozen of the most common, well-distributed, and strident bird species will define most visitors' experience with Forest Park wildlife. Of all the wildlife species, perhaps the most vocal and prominent year-round resident is the tiny Pacific wren.

Ten avian families each contribute four or five species toward the park's breeding avifauna. Some of the flycatchers, vireos, and warblers are localized to a few sites, but many avian species thrive in the extensive forest interior habitat. Relative to some other regional natural areas, Forest Park has *lower* overall avian diversity, but a *higher* diversity of TEES Special Status Species. The relatively low avian diversity is attributable to low habitat diversity—the park is mostly a broad swath of interior forest. One-third of Forest Park's birds are special-status species and several of these are among the most abundant birds in the park. Long-term data collected in recent years indicate that nearly three dozen species of common birds—including chickadees, sparrows, kinglets, and thrushes—are experiencing population declines within the park. At the state level, at least 17 Forest Park species show evidence of population decline across broader Oregon, despite their apparent abundance in the park. A few species, such as the pileated woodpecker and purple finch, show recent evidence of population increases in the park.

Relatively few species of amphibian, reptile, and fish occur in the park. This is likely due to a lack of perennial standing water, springs, and ponds. Six amphibians are well distributed and abundant in the park in a combination of stream, riparian, and upland habitats. Most amphibians, like reptiles and fish, are silent, small, and elusive, and go unnoticed by park visitors. Some regionally common amphibian species are not found in the park or are localized to just a few sites due in part to a lack of ponds for breeding or a lack of wetlands.

Only a single fish species, a small sculpin, is a well-distributed breeder in the park. An isolated population of cutthroat trout breeds in Balch Creek, and a few cutthroats also breed in Miller Creek. Fingerling-sized coho salmon and steelhead are occasionally found in the lowest reaches of Miller Creek, suggesting that adult salmon also breed there. Other regional fish species are restricted by grated culverts, which physically exclude them from park streams.

No extensive surveys for reptiles have been completed in Forest Park, and only garter snakes are considered common and well distributed, mostly in sunlit powerline corridors and at the park perimeter.

Twenty-three species of terrestrial and aquatic mollusks occur in Forest Park. Most are native species, and several are common and well distributed. Mollusks are the most abundant class of terrestrial animals after insects. Slugs, snails, and microsnails contribute relatively equally toward terrestrial mollusk diversity, with snails being the most abundant group. Mollusks are important decomposers in the forest ecosystem, and are food for other wildlife such as coastal giant salamanders and barred owls.

Invertebrate animal species make up approximately 97% of the diversity of animals worldwide. Arthropods, a group that includes insects, arachnids, millipedes, centipedes, and crustaceans, are the most diverse and abundant invertebrate group in Forest Park. Great strides were made in 2012 to document the diversity of arthropods in Forest Park. More than 400 species of insects are currently known to occur. Beetles and moths contribute at least 340 species and dominate insect diversity, as they do worldwide. Within Balch Creek, diversity of invertebrates is relatively evenly split between the families of stoneflies, caddisflies, mayflies, and true flies, but mayflies are especially abundant there. Despite a substantial recent increase in our knowledge of Forest Park arthropod diversity, much remains to be known, and the diversity of these animals is likely to greatly exceed current figures. The diversity found during the 2012 BioBlitz for Forest Park Wildlife showed little overlap with years of data collected by Oregon Department of Agriculture and U.S. Department of Agriculture surveys, suggesting that additional surveys would substantially broaden our knowledge of arthropod diversity. In contrast to vertebrate wildlife groups, many arthropod species in the park are non-native. The number and impact of non-native species is poorly understood. About 10% of the insects and arachnids in the park have their origins in Europe and Asia.



*Snail found during 2012 BioBlitz*





*Invasive Garlic mustard*

### Threats to Forest Park Wildlife

The 1995 *Forest Park Natural Resources Management Plan* states that the establishment of an ancient forest ecosystem and the protection of wildlife communities are primary management goals. Several factors threaten the preservation of wildlife and their habitat in the park:

- Climate change
- Non-native invasive plants
- Non-native invasive insects and other wildlife
- Habitat alteration outside of the park
- Utility corridor management (habitat alteration within the park)
- Illegal park activities: homeless camps, rogue trails, nocturnal recreation
- Domestic cats at the park perimeter
- Air pollution
- Water quality degradation in Balch Creek
- Parasites, poisons, and persecution
- Fire and fire management

Some threats have been partially addressed through management actions such as the ongoing removal of invasive plants and the addition of staff and volunteer park rangers to enforce park regulations. Threats such as climate change are global in scale and preserving wildlife in the face of this and other challenges will require an adaptive management strategy.

### Gaps and Next Steps

For some wildlife taxa, the following basic information is lacking:

- Diversity (presence or absence)
- Abundance
- Breeding
- Habitat use
- Distribution
- Seasonality
- Population trends
- Ecology and threats to forest health

Important gaps are made clear from the available data on park wildlife. This is especially true for invertebrate animals, about which fundamental questions of diversity remain, and which are important to all aspects of park ecology. In other cases, knowledge gaps are more complex.

Stemming the pattern of ongoing loss of species, especially of birds and mammals, is a core concern of the recommended next steps.

Academic research projects, partnerships with regional agencies and other city bureaus, citizen science projects, and Portland Parks & Recreation (PP&R) actions will be necessary to fill gaps in our understanding of park wildlife.

**Gaps:**

**Mammals**

1. Mammalian population trends and annual cycles of abundance
2. Bat abundance, breeding status, and habitat use
3. Source of red and gray fox decline
4. Meso-rodent diversity
5. Elk habitat use and movements
6. Feasibility of woodrat and vole reintroduction
7. Porcupine abundance and habitat use

**Birds**

8. Avian population trends beyond the southern boundary
9. Source of known avian population declines
10. Source of the loss of landfowl. Feasibility of landfowl reintroduction
11. Special-status bird population dynamics for *common* and *uncommon* species

**Reptiles**

12. Rubber boa occurrence or absence

**Amphibians**

13. Red-legged frog breeding habitat access
14. Pond breeding habitat beyond the southern boundary
15. Northwestern salamander occurrence
16. Amphibian population trends

**Mollusks**

17. European red slug impacts

**Arthropods**

18. Arthropod diversity
19. Non-native arthropod impacts and abundance
20. Population trends among common species and threats to forest health

**Wildlife response**

21. To habitat restoration
22. To utility corridor management
23. To park users and dogs
24. To expansion of the trail system
25. To illegal park activities

**Wildlife habitat assessment**

26. Relative abundance of snags in the three management units
27. Coarse woody habitat volume
28. Regional habitat use by park species that forage and/or breed beyond the park boundary

### Summary

The data currently available on Forest Park wildlife are fairly robust and cover many taxonomic groups and habitat components. Forest Park supports a diversity of vertebrate wildlife that is dominated by birds. Songbirds and a few diurnal squirrels are the wildlife most commonly experienced by park visitors. Many of the park's birds are special-status species and many bird species are in decline, including common species and species of concern. Among regularly occurring mammals, all the special-status species are bats. Apex mammalian predators of the Coast Range ecoregion are effectively absent from the park. Many Coast Range species were likely to have been lost from the Tualatin Mountains prior to park establishment. Ongoing species losses among birds and mammals, including landfowl, woodrats, and foxes, have continued into recent decades, and the cause of these losses is mostly unknown.

The relatively few amphibian species in the park are all native to the region and are well-distributed residents. Few snakes, lizards, or fish inhabit the park. Arthropods, especially insects, are the most diverse and abundant group of animals in the park, and their diversity remains greatly underreported. Several threats to park wildlife are known: some of these include a great deal of uncertainty, some can be mitigated through PP&R management actions, and some are of a scale that reaches well beyond the park boundary. Many gaps remain in our knowledge of park wildlife and these can be filled over time by a combination of academic research; partnerships with federal, state and local agencies; citizen science projects; and PP&R management actions.



*Mountain beaver burrow*

# Introduction



Interest in Forest Park wildlife began with the park's creation and continues today. In 1948, the year Forest Park was created, the Committee of Fifty declared that one of the five primary objectives for park creation was “to provide food, cover, and a sanctuary for wildlife.”<sup>1</sup> In the 1976 *Management Plan for Forest Park*,<sup>2</sup> this objective was reiterated verbatim and expanded, stating that “a comprehensive [wildlife management] plan should be prepared by staff experts which would identify habitat needs to encourage and attract appropriate forms to Forest Park.” In the succeeding decades, management interest in park wildlife increased, driven partly by concerns about non-native plants such as English ivy, a focus on regional water quality, increased development at the park perimeter, and new forms of recreation.

The 1995 *Forest Park Natural Resources Management Plan*<sup>3</sup> was the first comprehensive set of guidelines for park management. The plan designated “the health of natural resources the top priority for park managers.” Among the many management guidelines, an entire section of the management plan was devoted to wildlife diversity, habitat use, and threats, and 16 wildlife-related projects were outlined, each with the single, explicitly stated goal of preserving, protecting, or improving “wildlife habitat value.” In subsequent years, some of these projects were implemented, while others, due primarily to budget constraints, were not.

In 2010, wildlife concerns once again came to the forefront during meetings of the *Forest Park Single-Track Advisory Committee*, a citizen group convened to examine the proposed expansion of mountain biking opportunities in the park. The committee's final report<sup>4</sup> recommended four management actions to Portland Parks & Recreation (PP&R) to better inform any proposed expansion of recreational use. The first recommendation was to “complete a comprehensive wildlife and vegetative study to create a baseline to be used for management decisions and to better understand the park ecology.”

Public and management interest in Forest Park wildlife continues today, 65 years after the park's founding. The *Forest Park Ecological Prescriptions Report*<sup>5</sup> outlines 39 projects, and among these 15 are centered on wildlife and wildlife habitat. Another 17 projects are closely linked to wildlife values, and these focus on water quality, forest structure, and intact native ecosystems.

### Objectives

The primary objectives of this report are to provide both a broad description of Forest Park wildlife and detailed species information based on the best available data, whether historical, recent, anecdotal, or rigorously collected via research. For each species, we have focused on its standing within the park boundary, and the main goals have been to determine the following:

- Presence or absence
- Breeding status
- Relative abundance
- Distribution
- Special status

Many sources of information have been queried, previous analyses have been reviewed and used when possible, and new analyses and presentations of data undertaken.

The other major goals of this report are to

- identify gaps in our knowledge about park wildlife,
- identify threats to park wildlife, and
- define next steps in the research and management of park wildlife that could be taken to close important gaps and mitigate threats.



*Youth Conservation Crew members*



# Report Framework



## Audience

This report is intended for the following audiences:

- City commissioners, park managers, and staff, to provide wildlife information that can assist in making management decisions
- The public, to provide insights into wildlife diversity and ecology in this large, public natural area
- Academic and agency researchers, to provide information that supports current and guides future research

## Wildlife

For the purposes of this report the term “wildlife” includes all undomesticated, free-roaming animals, including vertebrate and invertebrate species (not plants, fungi, water, soil, geological features, or humans).

A few focal species are of management concern due to their status, home range requirements, well-documented ecological impact, or public interest, and these are sometimes discussed at greater length. Other species are less frequently discussed due to a lack of information about them, or conversely, due to their regional familiarity, and well-documented life histories. In some cases wildlife have been described relative to habitat strata (aerial, arboreal, terrestrial, fossorial, aquatic) and circadian (diurnal, nocturnal, crepuscular) and circannual patterns (winter, spring, summer, fall) to best examine the current knowledge of wildlife and where and why gaps exist.

Wildlife have usually been grouped taxonomically in order to best frame the abundance and distribution for each class, family, and species in the park. We examine two fish families, four amphibian groups, three reptilian groups, 18 bird families, and seven mammalian orders. Arthropod *classes* and *orders* are typically discussed rather than individual *species*, because some of these groups are so large. Four groups of mollusks are also discussed.

Invertebrate animals are the most diverse and poorly understood of all park wildlife. Invertebrates function as leaf shredders, pollinators, wood decomposers, soil aerators, and pest controllers and are the basis of the food chain for many species of vertebrate wildlife. Invertebrates can also be threats to forest health. However, we tend to know little about the relative abundance and habitat use of invertebrates, especially insects, despite recent efforts to catalog this diversity.

In some cases, species that have not been detected in the park are nevertheless included in tables and figures (e.g., Table 5, where occurrence is *undetermined*). Such species are considered of *interest* for Forest Park because they are found regionally and the park may have suitable habitat, but their presence or breeding status remains undetermined because they have not been the target of surveys in the appropriate habitat or season. Rare species and those that are difficult to detect have been included, particularly when they are species of management concern. Similarly, extirpated species are of interest for understanding historical diversity and trends in species losses, and as possible reintroduction candidates.

Birds that are strictly flyovers and do not physically alight on Forest Park habitat are not discussed. Species that only occur near but not in the park, and that are found in habitats that are rare or absent from the park (e.g., river otter in Multnomah Channel) are also not mentioned.

### Special Status Species

The City of Portland's *Terrestrial Ecology Enhancement Strategy (TEES) Summary and Update*<sup>6</sup> created a list of Special Status Wildlife Species whose range includes Portland and that are listed or of concern by the following agencies and organizations:

- U.S. Fish and Wildlife Service (USFWS)
- Oregon Department of Fish and Wildlife
- Oregon Biodiversity Information Center (formerly the Oregon Natural Heritage Information Center)
- Oregon Watershed Enhancement Board
- Partners In Flight
- Northwest Power and Conservation Council
- National Audubon Society and the American Bird Conservancy

For the purposes of this report, we have adopted the TEES Special Status Species criteria, while paying closest attention to species that receive federal or state-level protections.

### Wildlife Gap Analysis

A *gap* is the missing information between our current level and our desired level of knowledge about a species or group of wildlife in Forest Park. Our current level of wildlife knowledge is found in the detailed wildlife information sections of this report. Our desired level of knowledge for any species is a complete picture of its ecology with respect to the park. We recognize that we shall seldom have all the desired information on any species.

Some key types and examples of gaps in wildlife information include the following:

- Presence/absence: a lack of information on the presence or absence of a species such that targeted surveys are necessary
- Breeding status: a lack of knowledge about whether a species breeds in the park
- Breeding success: for special-status species, breeding success rates and whether the park population is self-sustaining, or perhaps represents a population source or sink
- Distribution: a lack of information on where a species is found in the park, especially per management unit
- Habitat use: a lack of information about how a species uses habitat structure in the park, for example, whether bats use mature broken-top coniferous trees as colonial roosts
- Wildlife response to management actions: for example, a lack of information about how wildlife respond to removal of invasive species or to oak release through conifer removal, or whether shrub-associated birds and invertebrate pollinators are using restored powerline corridors and breeding there successfully
- Details of habitat features that were historically common, but are now rare or absent, especially those that could be restored to benefit wildlife
- Long-term trends in abundance, especially for special-status species
- Invasive species impacts: for insects in particular, it is important to know if native species are declining and whether the forest is becoming vulnerable to invasive wood-borers due to a lack of natural controls

### Eras

The data and observational accounts that describe the current level of wildlife information for Forest Park include sources going back to 1901. For the purposes of this document we have adhered to three eras when describing source information:

- |                     |           |
|---------------------|-----------|
| • Historical        | 1800–1979 |
| • Intermediate past | 1980–1995 |
| • Recent            | 1996–2012 |

Data from the historical era are often scant and lacking in methodological structure, but give insights into the historical habitat condition, and into wildlife diversity before extensive human habitat alteration and afterwards, including when much of Forest Park was regenerating following logging and fires. Data



from the intermediate past include the first few methodological surveys for wildlife prior to the 1995 *Natural Resources Management Plan*, when some of the park was still immature second-growth forest and the trail system was incomplete. During the recent era, the forest transitioned to mostly mature second-growth trees and abundant ground and shrub cover, the trail system was completed, and numerous systematic wildlife studies were undertaken.

### Edge Habitats

Forest Park contains a variety of forest edge habitats. Edge habitat is created by a linear landscape feature, often a road, powerline corridor, residential boundary, logging clear-cut, or natural ecotone. The effect of an edge on wildlife often extends into the adjacent forest. However, edge habitats in Forest Park are often dissimilar with respect to vegetative structure and wildlife habitat value. Because wildlife diversity and response is likely to vary with edge type, this report distinguishes between the following forest edges:

- The hard forest edge, where the forest gives way to a great expanse of unforested area (e.g., near Highway 30)
- Powerline corridors, which create a narrow swath of shrub habitat between broad forested tracts (e.g., Firelane 4)
- The residential edge (e.g., segments of NW Skyline Boulevard), where single-family homes abut the park and the forest is broken up but not completely eliminated
- Interior park roads and firelanes, which seldom break the forest canopy (e.g., Germantown Road and Firelane 10)



*Bobcat near a residence*

# Forest Park Description and Wildlife Habitat Key Components

Forest Park is located on the northeast-facing slope of the southernmost segment of the Tualatin Mountain Range, a narrow, westerly extension of Oregon's Coast Range ecoregion (Figs. 1 and 2). The park is a forested peninsula that is surrounded on three sides by the Willamette Valley ecoregion. The park is approximately 7.5 miles long and 1 mile wide, and the park boundary encloses nearly 5,000 acres between NW Newberry Road, NW Skyline Boulevard, West Burnside Road, and NW St. Helens Road.

The long northeastern boundary sits about 100 feet above mean sea level, and is separated from the Willamette River by Highway 30 and an industrial area under which nearly all of the park's streams run through closed culverts after exiting the park. From the low northeastern boundary, the park rises to approximately 1,000 feet in elevation along most of its long southwestern boundary, and its highest point is nearly 1,200 feet.

For the purposes of this report, Forest Park is restricted to the area within the official park boundary, which is primarily forested, but includes utility corridors, trails, water tower buffers, and NW 53rd Avenue and Germantown Road. The Portland Audubon Society's sanctuaries, which lie adjacent to Forest Park, are not included.

From a management perspective, Forest Park is divided along its southeast to northwest axis into three units (Fig. 3):

- South Management Unit: West Burnside Road to Firelane 1
- Central Management Unit: Firelane 1 to NW Germantown Road
- North Management Unit: NW Germantown Road to NW Newberry Road

Per the 1995 *Natural Resources Management Plan*, wildlife habitat is to be protected and restored in all units, and all units are open to recreation. However, the management plan outlines an inverse geographical gradient for balancing recreational user activity and wildlife habitat protection, such that wildlife habitat values reach their highest priority in the North Management Unit, while recreational uses are more intensive in the South Management Unit.

## Landscape

### Forested landscape summary

The park is similar in habitat character to Oregon's Coast Range, which has been broadly designated as *Westside Lowlands Coniferous-Hardwood Forest*.<sup>7</sup> Aerial and ground-based surveys show that Forest

## Forest Park Description and Wildlife Habitat Key Components

Park is overwhelmingly forested, with few woodlands, meadows, or other openings, except at trailheads, water tower buffers, and the approximately 8.5 miles of utility corridors (Fig. 1; Table 1). The park is mostly *Interior Forest*, a TEES Special Status Habitat.<sup>6</sup> Mixed conifer-hardwood forest dominates the park, but not uniformly. Due to historical disturbance, the park landscape is an irregular patchwork of forest types and ages (Fig. 3; Table 1, National Vegetation Classification Standard [NVCS] subclass).

The park is a peninsular forest fragment with connections to Coast Range forest; urban, suburban, and rural environments; and broad, hardscape barriers near the Willamette River. Movements by terrestrial wildlife across the long northeastern boundary and urban southeastern boundary are limited. Therefore, the park is likely to function as a wildlife *reservoir* for most forest interior species, and a stopover for migratory birds, more so than as a wildlife *corridor* for dispersing or migrating terrestrial wildlife. Narrow forested and open corridors beyond the park boundary allow some park wildlife to move to and from natural areas in suburban neighborhoods to the southwest, the Coast Range to the northwest, and rural lands and natural area corridors to the west.

### Historical logging and fires

For nearly 100 years prior to 1960 many areas in the park were logged, both legally and illegally.<sup>1</sup> For example, as a form of assistance for Depression-era victims, the city ran a logging camp that clear-cut areas between Saltzman and Springville roads. Even as late as 1951, high-lead logging, a system of cutting that employed cables, pulleys, a spar tree, and heavy duty equipment (a yarder), was still being used in the park.<sup>1</sup> Today, more than 1,200 acres still show direct evidence of historical logging in the form of cut stumps (Table 1). During the same pre-1960 era that included logging, three stand-replacing fires razed broad areas in the central and southern parts of the park.

### Major streams

Seven major streams (Table 2; Fig. 3) cut the full width of Forest Park, and numerous smaller ones cut the northeastern side. The perennial streams that drain much of the park's habitat are designated as *Westside Riparian-Wetlands*.<sup>7</sup> The volume and continuous flow in the large park watersheds are important for all types of wildlife. Balch Creek is the largest park stream and is the only one that supports breeding salmonids. Only 25% of its 2,236-acre watershed is protected within the park boundary.<sup>8</sup> Only Miller Creek's short, ungrated culvert allows fish passage to the Willamette River. Other park streams, including dozens of

The northwestern park boundary is a forested connection to the Coast Range and abuts rural-residential properties, including small farms near NW Newberry Road. In addition, Portland Metro and the Forest Park Conservancy own approximately 500 acres of protected lands (*Agency Creek* and the *Ancient Forest Preserve*) near this boundary. Much of the private forest and publicly owned, protected forest near this boundary has been logged in recent decades and has regrown as young coniferous forest. Thus species that prefer young forest or residential edge habitat, and those dispersing from and to the Coast Range are likely to occur near this boundary. For some large mammalian species, travel through the forested corridor to and from the broader Coast Range forests may be impeded by an active rock quarry, residential properties, and fencing near NW Cornelius Pass and NW McNamee roads.<sup>10</sup>



## Forest Park Description and Wildlife Habitat Key Components

Nevertheless, elk are known to enter and exit the park annually via this corridor.

The southwestern boundary lies along a ridgetop near NW Skyline Boulevard and is abutted mostly by single-family homes and a few small farms and ranches. Species that prefer residential edge habitat, as well as those dispersing to and from nearby pasturelands, woodlands, and streams are likely to use this boundary. The rural lands of the eastern Tualatin Valley (a.k.a. “Skyline south” or “upper Rock Creek”) are used by a variety of wildlife including medium-sized and large terrestrial mammals such as beaver, bobcat, and deer. Elk in particular are found in this area and are believed to move to and from Forest Park across the southwestern park boundary.

### *The southeastern boundary: the urban connection*

The southeastern park boundary is winding and jagged and abuts a mix of urban and suburban residential homes as well as the Audubon sanctuaries and private forest lands before giving way to extensive urban and suburban development. The Audubon sanctuaries provide wildlife with an extension of the forest interior habitat that dominates the park, and contain old-growth remnants that are especially valuable habitat. Near the southernmost boundary of the park, terrestrial wildlife such as elk are prevented from further movements southward by dense residential development, major roadways, and downtown Portland.

## Wildlife Habitat Key Components

### **Snags, mature conifer forest, and old-growth remnants**

Five native tree species dominate the park, and several others contribute <5% to the forest canopy (Fig. 4).<sup>11</sup> Nearly one-half of all trees are bigleaf maples. Late-successional conifer stands are evidenced by mature Douglas-fir trees, many of which are >100 years old, >175 feet in height, and >3 feet in diameter at breast height (dbh). Some stands also contain old-growth Douglas-fir remnant trees that are >200 years old, >200 feet in height, and >6 feet dbh. Field surveys of these stands have located some ancient, broken-top trees that achieve great diameter but not height. Large broken-top trees can be especially valuable for bats, owls, hawks, squirrels, voles, and weasels for roosting, nesting, and feeding, and for clouded salamanders where they occur.

Approximately 8% of standing trees are snags, ranging from 4% for bigleaf maple, to 12% for Douglas-fir.<sup>12</sup> Snags and the fungi they contain are a primary food source for wood-boring beetle larvae, and plump beetle larvae are themselves important food for



*Snag towering above the forest canopy*

woodpeckers, corvids, shrews, and other wildlife. Woodpeckers often create nest cavities in the soft, dead wood of snags, and these cavities are used secondarily by rodents, small owls, nuthatches, chickadees, and snakes for nesting. Cavities initiated by pileated woodpeckers in live western red-cedar trees are also relatively abundant and are preferred by at least one owl species.<sup>13</sup>

### Ground cover and shrubs

Ground cover and shrub species are important for most park wildlife and are diverse and abundant throughout most of the park in both forested and unforested areas (Table 3). Leafy green vegetation such as vanilla leaf, Pacific waterleaf, and trillium provide food for larval moths, snails, slugs, mountain beaver, and deer, and are cover for the shrews, rodents, sparrows, and thrushes that forage on the forest floor. Berry-producing plants including salal, thimbleberry, and red huckleberry provide food for thrushes, rodents, raccoon, skunks, deer, and coyote. Shrubs such as beaked hazel and vine maple provide nest structure and insect habitat for the warblers, wrens, and other species that breed and forage in that layer. Red elderberry is common and is a preferred food of band-tailed pigeons.

### Coarse woody habitat

Fallen trees and large branches on the forest floor and in streams (coarse woody debris, large woody debris) become important wildlife habitat for fish, amphibians, reptiles, birds, mammals, and invertebrates in uplands, streams, and riparian areas. In uplands, downed wood holds moisture and creates damp, shady microhabitat that is ideal for slugs, snails, arthropods, frogs, salamanders, and their mammalian and avian predators. The abundance of *Ensatina* salamanders and Trowbridge's shrews, common Forest Park species, is known to increase directly with the volume of coarse woody debris.<sup>14</sup> In addition, beetle larvae thrive on the interior wood, and the small cavities in the exposed root balls of downed trees are often used by Pacific wrens for nesting. In-stream large woody debris is important for fish, stream-associated amphibians, and invertebrates. Riparian sites in Forest Park vary widely in in-channel woody habitat volume (Fig. 5). Some sites fall below the undesirably low benchmark (20 m<sup>3</sup>/100-m stream length) set by the Oregon Department of Fish and Wildlife, but other Forest Park sites approached or exceeded the desirable benchmark (30 m<sup>3</sup>/100-m stream length).<sup>15</sup>

### Forest floor

The forest floor across most of the park is a thick duff layer (leaf litter) of decomposing leaves, needles, and twigs—organic material

## Forest Park Description and Wildlife Habitat Key Components



*Mountain beaver foraging near its burrow entrance at night in the north management unit of Forest Park, August 2012*  
(Photo: Shervin Hess and John Desbler)

that is especially valuable to leaf-shredding invertebrates including millipedes and adult beetles, which are themselves valuable food for amphibians, small mammals, and birds. Moles tunnel through the duff and underlying soil in search of worms, and mountain beaver and other mammals construct burrows there. The leaf litter sits atop a sometimes deep layer of wind-blown sand, silt, and clay (loess), which lies atop a bed of igneous rock created by volcanic activity that was especially productive 17 to 14 million years ago.<sup>16</sup> In steep park drainages the soil and duff layers are often thin and the basalt rock is nearly exposed.

### Exposed rock

Areas of exposed rock are habitat for reptiles, chipmunks, and cliff-nesting species. The abandoned rock quarry (a.k.a. “Rivergate”) on the main stem of Doane Creek provides the only expansive rocky habitat in the park. Peregrine falcons have nested there, and it is the only location where lizards have been found in the park. Rock that was exposed by the construction of Leif Erikson Drive is now forested over, and provides habitat for small mammals, amphibians, and invertebrates.

### Water

All wildlife rely on water. During much of the year water is not a limiting resource, because both perennial and intermittent streams are available to wildlife and small seasonal ponds and micro-pools dot the landscape. However, during the summer dry season, perennial streams become especially valuable to wildlife, thus water quality in these streams is particularly important. Water quality is directly related to the protected watershed area, at least with respect to waste load allocations (bacterial), ammonia, and total suspended solids.<sup>17</sup> For example, the Saltzman/Rocking Chair Creek watershed lies mostly within the park boundary and had the highest water quality relative to Miller and Balch creeks. Conversely, Balch Creek watershed lies mostly outside the park’s protective boundary, and water quality has decreased across several metrics from 2002 to 2008.<sup>17</sup> The decrease in water quality may impact wildlife.

### Habitat Distribution

Forest Park is primarily a mixture of forested uplands and riparian areas (Fig. 3; Table 1, NVCS class). Narrow, riparian bottomlands occur throughout the park and are often dominated by red alder, bigleaf maple, and dense, fruiting shrubs, especially salmonberry. The park’s riparian areas are a component of *Bottomland Hardwood Forest and Riparian Habitat*, a TEES Special Status Habitat.<sup>6</sup>

## Forest Park Description and Wildlife Habitat Key Components

Upland areas are commonly a mixture of mature, second-growth Douglas-fir and bigleaf maple trees, shrubs, and dense ground cover. Several late-successional, conifer-dominated stands are scattered throughout the park, and these cover approximately 17% of the park (Fig. 3; Table 1, NVCS formation: Giant temperate needle-leaved evergreen forest). The broadest late-successional stand is nearly 125 acres between Germantown and Springville roads (Fig. 3B). *Late Successional Conifer Forests* are a TEES Special Status Habitat.<sup>6</sup> The oldest remnant trees in the park are down in the draws created by Balch, Springville, Newton, and Linnton creeks. The easily accessible junction of Firelane 10 and the south fork of Linnton Creek holds several older Douglas-fir and grand fir specimens.

The forest is a patchwork of successional stages due to historical disturbances and subsequent forest regeneration (Fig. 3). Broadly speaking, the northern half of the park is conifer-dominated, whereas the southern half contains extensive stands of deciduous-dominated forest. Pure deciduous and pure coniferous stands occasionally occur as a result of regrowth or replanting following historical disturbances (Table 1, NVCS subclass). In a few patches, the forest is dominated by young Douglas-fir, such as at the junction of the Wildwood Trail and Saltzman Road. In contrast, the broad area between Firelane 1 and the Alder Trail stands out as a mostly deciduous stand lacking a major stream (Fig. 3C). This patchy variation in forest character affects wildlife distributions, because some species, such as the northern flying squirrel and red-breasted sapsucker, have a preference for mature coniferous forest, whereas others, including the downy woodpecker and warbling vireo, are associated with deciduous-dominated habitat.

Small sections of *Oak Woodlands* can be found in a narrow band on the steep slopes of the northeastern edge of the park, especially near the junction of the BPA and Newton roads.<sup>6,11,18</sup> Oregon white oak (*Quercus garryana*) and Oregon ash (*Fraxinus latifolia*) are representative tree species in this TEES Special Status Habitat. Some oak-associated wildlife species, including white-breasted nuthatch, are found occasionally in these isolated habitats in the park, but others, such the western gray squirrel, are considered absent from the park despite the presence of oaks.

*Herbaceous Wetlands*<sup>19</sup> are mostly absent from Forest Park, though many low-lying, forested microsites do support lilies and other aquatic plants characteristic of wetlands (Table 1, *Hydrophilic vegetation*).





*Black-tailed deer seen in Forest Park during the 2012 BioBlitz*

# A Broad Description of Forest Park Wildlife

## Vertebrate Wildlife: Birds, Mammals, Amphibians, Reptiles, and Fish

Vertebrate wildlife diversity is dominated by avian and mammalian species, and of these about 30% are TEES Special Status Species and few are non-native (Figs. 6–9; Tables 4–7). However, many bird and mammal species are only seasonally present, rare, or nocturnal, or occur naturally at low density, and as such are seldom experienced by park visitors. In contrast to birds and mammals, few species of amphibian, reptile, and fish inhabit the park, although the amphibian species that do occur tend to be well-distributed, abundant residents. All the fish, reptiles, and amphibians that occur in the park are native species. Eight vertebrate species are federal species of concern, one is threatened, and the northern spotted owl is federally endangered (Table 8).

The most abundant and well-distributed vertebrate species in the park are associated with forest interior habitat in either riparian or upland areas, or both. Species that have strong associations with open shrublands, grasslands, forest edge, human settlement, or bright sun tend to be found only along powerline corridors, the park perimeter, or park-bisecting roadways. Other species that require habitats that are rare in the park such as ponds, meadows, open forest, exposed rock, oak woodlands, perennial streams, wetlands, or springs tend to be absent from the park, or are found in low numbers at only a few sites.

### Birds

One hundred and four avian species are known to occur in the park, and about a dozen of these are rare (Table 4). Many avian species are uncommon because they occur at naturally low densities, or only in specific habitats, and others are present only during spring and fall migration. Birds are the most conspicuous wildlife class because they are vocal, diurnally active, and abundant. The sights and sounds of up to three dozen of the most common, well-distributed, and strident bird species will define most visitors' experience with Forest Park wildlife. Of all the wildlife species, perhaps the most vocal and prominent year-round resident is the tiny Pacific wren.

Ten avian families contribute in nearly equal proportions to the diversity of breeding birds (Fig. 10). Some of the flycatchers, warblers, sparrows, and finches are localized to a few sites, but many species thrive in the extensive forest interior habitat (Fig. 11). Relative to some other regional stream corridors, Forest Park



*Black-tailed deer foraging at night  
in Forest Park, 2010  
(Photo: Dan Richardson and PP&R)*

riparian areas had *lower* overall avian diversity, but a *higher* diversity of TEES Special Status avian species.<sup>20</sup> One-third of Forest Park's birds are Special Status Species (Fig. 12; Table 4) and several of these are among the most abundant birds in the park (Fig. 13). The relatively low avian diversity is likely symptomatic of low habitat diversity. Despite their abundance in the park, several species show evidence of population declines in recent years, including bushtits and chestnut-backed chickadees (Fig. 14). Across the Oregon landscape, at least 17 Forest Park species show evidence of decline (Table 9).

### Mammals

Forty-five species of mammals representing seven taxonomic orders are known to occur in Forest Park (Table 5). These constitute more than two-thirds of the 65 terrestrial mammal species known to occur in western Oregon<sup>21</sup>; however, only 17 of the mammalian species are considered abundant and well-distributed in the park. Mammalian diversity is dominated by rodents, bats, and carnivores (Fig. 8). Most of the park's mammalian wildlife species are some combination of nocturnal, small, arboreal (tree-dwelling), or fossorial (burrowing), and are seldom seen by park visitors. Exceptionally, the Douglas squirrel and Townsend's chipmunk are common, vocal, diurnal mammals often seen and heard near trails. Two of the most abundant mammals are the deer mouse and Trowbridge's shrew, and these are an important food resource for many carnivores and owls (Fig. 15). In contrast, some large rodent and carnivore species are rarely found, such as the porcupine and black bear. Deer and elk occur in the park, but only deer are common year-round residents. Elk occur seasonally, typically in low numbers, and appear to rely heavily on external resources beyond the park perimeter for foraging and breeding, especially in upper Rock Creek, Skyline south, and the northwest Tualatin Mountains. Most of the bat species that occur or may occur in the park are on the TEES Special Status Species list. However, the distribution, abundance, breeding status, circannual patterns, and habitat use of bats in Forest Park is poorly understood.

Five mammalian species are non-native (two rats, two squirrels, and the opossum), and these are typically found near the residential park perimeter, though opossum are likely well distributed in the park. Some other mammalian species, particularly woodrats, tree voles, and pocket gophers, have not been documented in the park though they are at least somewhat likely to occur based on forest and riparian habitat associations (Table 5).<sup>21,22,23</sup> A variety of methods have been used to catalog mammalian diversity in the park including capture-based research, motion-detection camera



surveys, owl prey analyses, and observational accounts by park staff, users, and neighbors.

## Amphibians, Fish, and Reptiles

Relatively few species of amphibian, reptile, and fish occur in the park (Table 6), and part of the discrepancy in diversity with respect to birds and mammals is likely due to habitat factors related to ponds, stream size, stream gradient, sunlight penetration, rocky outcroppings, and canopy closure. Six amphibians, including four salamanders and two frogs, are well distributed and abundant in a combination of stream, riparian, and upland habitats. Most amphibians, like the reptiles and fish, are silent, small, and elusive, and go unnoticed by park visitors. However, the Pacific tree frog is especially vocal during the breeding season, and the “chorus” of these frogs at some sites can be enjoyed by park visitors, especially at dusk. Some regionally common amphibian species have not been found in the park and may be localized to just a few sites.

Only a single, small fish species, a sculpin, is a well-distributed breeder and even this species is absent from some large streams. Most other regional fish species are restricted by grated culverts that physically exclude them from park streams. An isolated population of cutthroat trout breeds in Balch Creek, and a few cutthroats also breed in Miller Creek. Fingerling-sized coho salmon and steelhead are occasionally found in the lowest reaches of Miller Creek, suggesting that adult salmon also breed there.

No systematic surveys for reptiles have been undertaken in Forest Park. Common and northwestern garter snakes are the only well-distributed reptile species, and these are seen by park visitors in summer at trailheads and along powerline corridors and firelanes. Based on observational sources and habitat associations, only a few species of live-bearing reptiles are likely to be found. The rubber boa is a live-bearing snake that is likely to occur in Forest Park, but it has never been reported. Many reptiles need direct sunlight to raise and maintain their body temperature to be active. In addition to body-warming sunlight, egg-laying reptiles often require sites with soft soils to excavate their nests, and direct sunlight to warm those nests. Such sites are uncommon in the park. These factors and a lack of perennial ponds also exclude turtles from the park.



*Ensatina* salamander found during BioBlitz  
in Forest Park, 2012

### Invertebrate Wildlife: Mollusks and Arthropods

Invertebrate animal species make up approximately 95% of the diversity of animals worldwide, and a similarly large percentage of Oregon's terrestrial animal species are invertebrates (approximately 10,000–10,500). Therefore, an understanding of wildlife in Forest Park needs to include a discussion of invertebrate species, even though and because data are often lacking.

#### Mollusks

Twenty-three species of terrestrial and aquatic mollusks are known to occur in Forest Park (Table 7). Most are native species, and several are common and well distributed. Banana slugs and Pacific side-band snails are large and beautifully marked, and are often seen by park visitors. Mollusks are the most abundant class of terrestrial animals after arthropods. Slugs, snails, and microsnails (shell diameter <3 mm) contribute relatively equally toward terrestrial mollusk diversity, but snails are the most abundant group (Fig. 16). Specifically, the banana slug, the robust lancetooth, and the denticulate tightcoil are the most abundant slug, snail, and microsnail, respectively, and each contributes >50% toward total abundance within its group.



*Coastal giant salamander (adult)  
near Linnton Creek with a  
banana slug in its mouth, 2008  
(Photo: John Desbler and Ian  
Matthews)*

Mollusks are important decomposers in the forest ecosystem. They eat parts of dead and living plants as well as fungi and carrion. In addition, slugs and snails are important food for other wildlife. Banana slugs are a preferred food of coastal giant salamanders, and several species of birds, small mammals, and snakes—including corvids, owls, shrews and garter snakes—eat both snails and slugs.

Two species of small aquatic snails and one small clam also occur, but several larger, regionally common aquatic mussels are absent.<sup>24</sup> In the aquatic environment, bivalves filter small organisms from freshwater, and snails scrape algae from rocks.

#### Arthropods

Great strides were made in 2012 to document the diversity of arthropods in Forest Park (Tables 10 and 11). Arthropods, members of the phylum of animals that includes insects, spiders, millipedes, centipedes, crustaceans, and others, are the most diverse and abundant animals in Forest Park, as they are worldwide. More than 400 species of insects are currently known to occur, and they are the dominant arthropod group (Fig. 17). Beetles and moths contribute at least 340 species and dominate insect diversity (Fig. 18). Within Balch Creek, diversity of invertebrates is relatively evenly split between the families of stoneflies, caddisflies, mayflies, and true flies, but mayflies are

especially abundant (Figs. 19 and 20). The abundance of Balch Creek invertebrates has been shown to follow continental patterns of climate<sup>25</sup> (Fig. 21). It is believed that increased rains in some years washes nitrogen from the air into park streams, and increased nitrogen negatively affects invertebrate populations there. Despite a substantial increase in our knowledge of Forest Park arthropod diversity much remains to be known, and the diversity of these animals is likely to greatly exceed current figures.<sup>26</sup> The diversity found during the 2012 BioBlitz for Forest Park Wildlife showed little overlap with data from Oregon Department of Agriculture and U.S. Department of Agriculture (USDA) surveys, suggesting that additional surveys will quickly broaden our knowledge of arthropod diversity.

Insects function in many ecologically important roles, including the recycling of biological material and as food for other wildlife. For example, carpenter ants consume dead wood and are also a preferred food of pileated woodpeckers. Many insects are pollinators, including bees, wasps, ants, moths, butterflies, beetles, and flies. Insect pollinators facilitate seed production and plant propagation, and both the seeds and the insects themselves are important food resources for birds such as warblers, kinglets, thrushes, and sparrows; amphibians, including northern red-legged frogs; and small mammals such as mice, bats and shrews. Twenty-four-hour video surveillance indicates that moths are an important part of the summer diet of pygmy-owls. Nevertheless, among all wildlife groups in Forest Park, we know the least about the diversity, function, and ecology of insects and other arthropods.

In contrast to vertebrate wildlife groups, about 10% of arthropod species in the park are non-native. The number and impact of non-native species is poorly understood. Several arthropods in the park have their origins in Europe and Asia, including some spiders, ants, beetles, and moths.

## Historical Changes to Wildlife Diversity

Forest Park wildlife habitat has undergone a series of alterations in the preceding 150 years, particularly to the tree canopy and forest floor. These changes have affected the diversity and abundance of species. Lewis and Clark described the area including present-day Forest Park as an old-growth coniferous forest with tree diameters of 5 to 8 feet. Old-growth habitats such as the one they described tend to have all elements of a structurally complex forest ecosystem, including extensive standing and downed wood and deep, uncompacted soils. Thus, it seems likely that the historical forest supported many more of the wildlife species described for

## A Broad Description of Forest Park Wildlife

the Oregon Coast Range<sup>21</sup> than it does today. In addition, until the early 1900s, the park was wholly connected to the Willamette River, Tualatin Valley, and coastal forests by a combination of broad wetland and riparian forest, unbroken old-growth forest, and west-side savannahs and grasslands. Forest Park was historically within a matrix of diverse habitat types through which wildlife could move freely.

Fire, logging, and development prior to 1960 eliminated or opened much of the forest canopy, and photographic evidence shows that the canopy in Forest Park remained somewhat open into the 1980s. Subsequently, the diversity and abundance of species such as bluebirds, landfowl, sparrows, flycatchers, woodpeckers, grassland voles, and ungulates is likely to have shifted.

Around 1990, some notable transitions in faunal diversity and distribution occurred. The forest canopy had matured and closed, and species such as the pileated woodpecker had returned, whereas the northern flicker abandoned the forest interior for the park perimeter. Barred owls were becoming established in Oregon. Gray foxes disappeared from the area, and bear sightings declined. Woodrats (*Neotoma sp.*) were being replaced by non-native rat species (*Rattus sp.*), and species such as sooty grouse and mountain quail were seen and heard for the last time in the park around this time. These transitions were likely driven by the combination of factors both within and beyond the park boundary. Some of these factors were forest regeneration, hunting, habitat fragmentation, increased residential and commercial development, the expanding range of some wildlife species such as coyote, and large-scale habitat alteration in the absence of fire and other natural disturbance regimes.

# Detailed Wildlife Information: Vertebrates



## Birds

Information on birds in Forest Park comes from sources of the historical era<sup>27,28</sup> and the intermediate past,<sup>10,22</sup> and also from the recent era in the form of research projects,<sup>12,29,30,31</sup> riparian monitoring, citizen science projects,<sup>32,33,34</sup> local bird and wildlife experts,<sup>35,36,37</sup> and the USFWS bald eagle monitoring program<sup>38</sup> (Table 10). Avian surveys were mostly point counts and transect counts, and the breeding biology and nest habitat use of some owls and raptors has been explored in detail.

Current bird diversity in the park reflects the combination of the park's mature, mixed-forest interior, with forest edge and shrub habitat along the park perimeter and in powerline corridors. Many birds, particularly water-associated species, regularly fly over the park but seldom or never alight in it and are not considered part of the park's avifauna.

### Bird families of interest for Forest Park (*in taxonomic order*)

#### Waterfowl

Mallard ducks use Forest Park, and pairs may breed there but no nests have been found. Mallards commonly nest in forested habitat, sometime more than a mile from the lakes and rivers where they are more commonly observed. No other waterfowl are known to use Forest Park.

#### Landfowl

Mountain quail, ruffed grouse, and sooty grouse (formerly "blue grouse") were formerly common in the park, but all have been extirpated. The 1901 *Park Commission's Report* lists them among the species present in City Park, a precursor to Washington Park, which at that time had unbroken habitat connectivity with the nearby lands of the future Forest Park. In the early 1900s, mountain quail were so common that local ornithologist Dave Marshall recalled that his father hunted them near Council Crest, and said that his great-grandfather "gave him [Dave's father] five shotgun shells and expected him to bring back five quail." Mountain quail were last reported on the Christmas Bird Count (CBC) in 1962. Similarly, ruffed grouse continued to be found in Forest Park into the 1980s,<sup>22,30</sup> but were last reported on the CBC in 1986 and have not been detected in Forest Park since 1990.<sup>10</sup> The sooty grouse were historically the least common among Forest Park's landfowl, but were common enough in the 1960s that a male was seen displaying for a harem of six or seven females.<sup>35</sup> The sooty





*Bald eagle brooding young on its nest high  
in an old-growth Douglas fir  
in Forest Park, May 2012  
(Photo: Bill Price)*

grouse was the last of the landfowl to be extirpated, such that a single individual was audibly detected in Forest Park in 1982,<sup>22</sup> and individuals were last reported regionally during the 1989 CBC. Sooty grouse, though often considered resident, are in fact short-distance migrants that move from relatively open breeding areas to the denser conifer forest in winter.<sup>39,40</sup> So the presence of sooty grouse during the winter-season CBC was expected, though their loss is not well understood. California quail, a native species, are still somewhat common in rural lands near, but not in, the park. Forest regeneration is believed to be a primary factor excluding quail from the park today.

### Hérons

Among ardeids, only the great blue heron is known to use Forest Park, where they occasionally feed in the lower reaches of Balch Creek.<sup>41,42</sup> However, in the decades prior to Forest Park being created, the great blue heron was a common breeding bird near the northeastern park boundary: “A rookery of great blue herons east of the Skyline and north of Saltzman Road, where hundreds of these great birds built their huge nests, each year attracted Audubon Society members and other nature study enthusiasts until the birds abandoned the area because of nearby logging.”<sup>1</sup>

### Vultures, Eagles, and Hawks

Turkey vultures are spring and summer inhabitants of Forest Park, and may be seen roosting in and below the forest canopy, or soaring above it. Turkey vultures select a variety of structures for nesting, including stumps, logs, and tree hollows near the forest floor, but the most important component of nest selection appears to be isolation from human disturbance.<sup>43</sup> No vulture nests have been located in the park.

Osprey breed annually along the Willamette River. This species occasionally roosts in the forest canopy from Balch Creek to the North Management Unit, but is not known to nest within the park.

Three pairs of bald eagles nested successfully in Forest Park in 2012, producing a total of four eaglets.<sup>38</sup> Each nest was constructed by the eagles in an old-growth Douglas-fir tree, and some pairs have been nesting at the same sites in the park for at least 5 years. In one case, thick braids of tree ivy were cut and removed from a nest-tree trunk by habitat restoration crews, helping preserve the tree for future nest attempts. The proximity of suitable nest trees to the Willamette River appears to be an important factor that limits bald eagle breeding to the central and north management units.

Among the true hawks, the Cooper's hawk is relatively common, initiating its breeding somewhat conspicuously in all sections of the park in March and April. The smaller and closely related sharp-shinned hawk is also found in the park and is presumed to breed there. The much larger northern goshawk sometimes nests in mature Douglas-fir forests,<sup>44</sup> but the species is only occasionally seen in the metro region and there are no records of its presence in Forest Park.

Red-tailed hawks are a common, widely distributed raptor in Forest Park and are often seen roosting and hunting below the interior forest canopy and soaring above it. Red-tailed hawks prefer open habitats and it is presumed that most red-tailed hawk breeding sites are near or beyond the park boundary.

Among falcons, only the peregrine falcon, a TEES Special Status Species that was federally delisted in 1999, has bred in the park.<sup>37</sup> Peregrine falcons are common breeders on bridges over the Willamette River along the park's northeastern edge and the abandoned rock quarry at Doane Creek is suitable habitat for hunting and breeding. The merlin, a small falcon species, is an uncommon but annual winter resident in the Portland area. Individual merlins are presumed to use the park occasionally during migration and winter, but not during the breeding season. The American kestrel is an annual breeding species in semi-open country in this region, including upper Rock Creek. Kestrels are seen occasionally in the uppermost section of the Firelane 15 corridor in the park, and in the industrial area along the Willamette corridor, but are not present in the forest interior and are not believed to nest in the park.

## Doves

The band-tailed pigeon, a special-status species whose population is declining across Oregon, is the only common, well-distributed dove in the park. Band-tailed pigeons breed in closed-canopy forests in western Oregon, placing nests near the bole of a sturdy tree in which they normally raise only a single squab. They typically nest two or three times per season.<sup>45</sup> The owl-like calls of this large bird are a conspicuous harbinger of spring. The mourning dove, a species that prefers open habitat, was formerly common in the park,<sup>35</sup> but increasing canopy closure has made them an uncommon, non-breeder. Rock pigeons mostly avoid the forested park despite their great abundance in the industrial area along the Willamette River. Non-native Eurasian collared doves are increasingly common regionally and may soon colonize the park perimeter, but this species prefers open habitat and is not using the park today.



*Red-tailed hawk*



*Three of the four owlets that successfully fledged from a barred owl nest in an alder tree in Forest Park, May 2012  
(Photo: Scott Carpenter)*

### Owls

Five species of owl breed in Forest Park and all are well-distributed residents. The invasive barred owl is a relatively recent addition to the park. Among the two larger owl species—the great horned owl and the barred owl—from five to seven pairs of each are known to breed in the park each year. In contrast, it is estimated that seven to 15 pairs of each species of smaller owl—the northern pygmy-owl and the northern saw-whet owl—breed each year in the park. The western screech owl is intermediate-sized, and is at home in both natural, forested habitats and urban and mixed environs. Nests of all four of the above species were located in 2012 in an exploration of predator ecology and small mammal diversity in the park. Both barred and great horned owls used old-growth, broken-top Douglas-fir trees for nesting, but barred owls also used maple and alder trees. All owls fed often on deer mice, but prey biomass of great horned owls was dominated by species including squirrels, rats, and rabbits.<sup>46</sup> Among owls, the northern pygmy-owl has been researched extensively for 6 years, and Forest Park is now the premier research site for data on breeding and habitat selection for this otherwise understudied owl.<sup>12,13</sup> The remarkable breeding success of pygmy-owls in Forest Park relative to small owls at other sites suggests that the park provides excellent breeding habitat and food resources.<sup>12,47,48</sup> Unlike larger owls that prey mostly upon mammals (Fig. 15), the diurnal northern pygmy-owl consumes a diversity of small birds about often as small mammals, and occasionally gorges on moths. Trends in pygmy-owl reproduction indicate an odd-even year cycle similar to that demonstrated by spotted owls at some sites,<sup>49</sup> such that pygmy-owls lay larger clutches and fledge more young in odd-numbered years.<sup>13</sup> This suggests the presence of a related trend in small mammal abundance, particularly of deer mice.

The northern spotted owl was a probable historical breeding resident based on habitat descriptions by Lewis and Clark and land surveyors. Even today this species is sometimes found in the park, though it does not breed there. In 2009 an individual northern spotted owl was observed and photographed at the southern park boundary, but this individual was likely a dispersing juvenile and not a breeding adult.<sup>50</sup> Remnant older forest stands in Forest Park may provide adequate breeding sites for northern spotted owls,<sup>51</sup> but declining spotted owl population in Oregon due to habitat loss, and the strong, detrimental competition from the invasive barred owl are reducing the potential for spotted owl breeding in the park.<sup>52,53</sup>



## Nighthawks, Swifts, and Hummingbirds

Common nighthawks were once well distributed and abundant in the Willamette Valley and the Portland area.<sup>35,36</sup> Though they still occur here annually, they have become relatively rare and there are no reports of them using Forest Park. Vaux's swifts are abundant and common in Portland during annual migrations. This species historically nested and made nightly roosts in the hollow tops of old-growth broken-top conifers, which are now rare on the landscape. Portions of the large migrating flocks that make a month-long roost at the Chapman School chimney in late summer are seen splintering off and heading for Forest Park to roost at dusk.<sup>54</sup> Rufous hummingbirds nest in the interior of Forest Park, and are common in flowering forest edges and shrublands in spring and summer. Anna's hummingbirds also feed and nest near the forest edge, including in residential areas, and are present year round. Data from the Portland CBC suggest that the regional abundance of Anna's hummingbirds has increased dramatically in that past 40 years, from fewer than 10 hummingbird detections per CBC in the early 1970s, to more than 100 in recent years.<sup>28</sup>

## Woodpeckers

Woodpeckers are important ecosystem engineers and create cavities and feeding holes that become future homes for many other species of mammal, bird, and reptile. Five species of woodpecker breed in Forest Park, and the downy and pileated woodpeckers are TEES Special Status Species. Pileated woodpeckers, hairy woodpeckers, and red-breasted sapsuckers are relatively abundant and well distributed throughout the park interior. They are often conspicuous breeders because their nestlings beg loudly from within the safety of the nest cavity, and remain in the nest longer than similarly sized birds. Pileated woodpeckers, the largest, are associated with mature conifer forests and have returned to Forest Park as it has matured, after a decades long absence.<sup>35,36</sup> Pileated woodpeckers have continued to increase during the past decade.<sup>33</sup> Downy woodpeckers are associated with deciduous forests, and their distribution in the park is patchy. Red-breasted sapsuckers show some preference for mature and second-growth coniferous or mixed forests and these habitats are abundant in the park. The least common Forest Park woodpecker, the northern flicker, prefers open forests and woodlands for breeding, and is common in residential areas near the park perimeter, particularly in winter. Though flickers were formerly abundant in the park, the increasingly closed forest canopy has made them rare in the park interior today. Historically, Lewis's woodpeckers were relatively common in the Portland area<sup>27,28</sup> when black cottonwood



*Pileated woodpecker*  
(Photo: Scott Carpenter)



*Olive-sided flycatcher*  
(Photo: Scott Carpenter)

riparian forests were also common. But this species has not been seen on the CBC since 1982. Lewis's and acorn woodpeckers, and yellow-bellied and red-naped sapsuckers are seen rarely.<sup>33</sup> These four species are not currently considered part of the avifauna of the park, though future management actions in favor of oaks and cottonwoods could benefit Lewis's and acorn woodpeckers.

### Flycatchers

Flycatchers are found in the park during migration and the breeding season. The Pacific-slope flycatcher is nearly ubiquitous in the forest interior during the breeding season in all management units. This is unique among the flycatchers. Olive-sided flycatchers and western wood-pewees also breed in the park, but are relatively uncommon and found almost exclusively along roadways including Cornell and Germantown roads, and at shrubby forest edges, especially near Firelane 13. The olive-sided flycatcher is a federal species of concern that is experiencing steep population declines in western North America (Table 9). Willow flycatchers and western kingbirds are only rarely found in the park near the shrubby powerline corridors such as the BPA Road. Hammond's flycatchers are occasionally found at the southern end of the park but their breeding status is undetermined.

### Vireos

Four vireo species have been found in Forest Park, and Cassin's, Hutton's, and warbling vireos are uncommon annual breeders. For these species, their abundance and distribution in the park is poorly understood. Forest Park lies near the southwestern breeding range limit of the red-eyed vireo, a deciduous forest species. The red-eyed vireo is considered rare and its occurrence in the park is known only from historical sources.

### Corvids

Five species of crows and jays breed in the park, but only the Steller's jay is relatively common in the forest interior. American crows and western scrub jays are common along the forest edge. Common ravens are a relatively recent addition to the Portland metropolitan area and the park's avifauna, and despite their name are relatively uncommon breeders in the park. Since 2008, a least two family groups of common ravens have been recorded breeding near Saltzman and the BPA roads. Similarly, but much less conspicuously, groups of gray jays have been recorded annually in recent years exclusively north of Germantown Road.<sup>55</sup> Besides these breeding-season detections, gray jays were found in Forest Park during the 2010 Portland CBC for the first time in 41 years.

## Swallows

Four species of swallow commonly forage above the forest canopy and along edges, and are presumed to occasionally roost in the canopy as well. These aerial insectivores feast on flying insects during spring, summer, and early fall. The barn swallow is known to nest in man-made structures along the park perimeter, especially near Skyline Boulevard. Tree and violet-green swallows are cavity nesters that often breed near water, and though they may breed in the park no nests have been reported. Purple martins and northern rough-winged swallows are rarely detected in the park.

## Chickadees, Nuthatches, and their Allies

Black-capped and chestnut-backed chickadees and red-breasted nuthatches are ubiquitous throughout the park in all seasons. These species are among the most abundant in the park, but nevertheless, both black-capped and chestnut-backed chickadees show evidence of recent population declines (Fig. 14). Brown creepers are also common and well distributed, and their nests are occasionally found behind the peeling bark of dead alder trees. Bushtits are also fairly common, but also show evidence of decline. Flocks of bushtits are found foraging in the forest from late summer through winter. The white-breasted nuthatch, often associated with oak habitat, is a TEES Special Status Species, and is uncommon to rare in the park. A few isolated oak-ash stands along the eastern park boundary provide limited habitat for them today, and could be increased with management efforts.

## Wrens, Kinglets, and Thrushes

The Pacific wren is probably the most abundant and well-distributed avian species in the interior of Forest Park, and is common in all seasons. In contrast, Bewick's wren occurs only along the shrubby forest edges, and is much less abundant. The house wren is mostly absent from the park, but may occur along the park's residential edge.

Golden-crowned and ruby-crowned kinglets are fall and winter residents, and flocks occur across the Portland region, including Forest Park, during those seasons.

The American robin and the Swainson's thrush are abundant avian species during the breeding season and are widely distributed in the park. Unpublished data on the population trend for robins in the park are contradictory, in one case showing a significant decrease near the southern park boundary,<sup>33</sup> and in another, an increase.<sup>30</sup> Among *Catharus* thrushes, the Swainson's thrush is in the park only in spring and summer, whereas the similar-looking



*Pacific wren*  
(Photo: Scott Carpenter)

hermit thrush is strictly a fall and winter resident, so these two congeners complement one another temporally. In recent years, the varied thrush, a TEES Special Status Species, has been detected singing in the North Management Unit throughout the spring and early summer, and is now considered a breeding species in the park. In contrast, large flocks of varied thrush overwinter in the park annually.

### **Warblers**

Nine warbler species occur in the park, six of them breed there, and six are TEES Special Status Species. Wilson's warblers are among the most common and well-distributed avian species in the park interior during the breeding season. They are found breeding in the shrub layer beneath the closed forest canopy, while black-throated gray warblers breed in the canopy, and orange-crowned warblers breed in shrubby forest edges. In some years, a few yellow warblers can also be found in shrubby edge habitat. Other warbler species, especially yellow-rumped and Townsend's warblers, are particularly abundant and conspicuous during spring migration, and are often found in mixed flocks, sometimes in large numbers.

### **Sparrows**

The spotted towhee has been studied in depth in regional city parks, not including Forest Park. Though it was abundant in all four parks where it was studied recently, two of the four park populations were *sinks*, indicating that local reproduction did not offset the level of adult mortality.<sup>31</sup> In Forest Park, the spotted towhee, song sparrow, and dark-eyed junco are common, vocal, conspicuous, and well-distributed residents in the interior and the perimeter edges in all seasons. Though still common, each of these species shows evidence of population decline in recent years in the park.<sup>33</sup> In contrast, white-crowned sparrows are found near the park boundary, especially near Skyline Boulevard. Fox, Lincoln's, and golden-crowned sparrows occur annually in winter in firelanes and utility corridors, and the white-throated sparrow is also an annual visitor.

### **Cardinals and Blackbirds**

Each spring, the western tanager and the black-headed grosbeak are colorful additions to the park avifauna, and are common breeders throughout the park. Tanagers tend to breed and forage in the forest canopy, whereas grosbeaks often inhabit understory trees. Lazuli buntings are known only from historical sources and are considered rare at forest edges. Blackbirds are found at the park perimeter.



## Finches

Among finches, only the purple finch, a TEES Special Status Species, is a well-distributed breeder in the park. The closely related house finch is mostly restricted to the residential edge. During the past decade, house finches have declined in abundance in the park while purple finches have increased (Fig. 14). Pine siskins, American goldfinches, and lesser goldfinches form conspicuous, noisy flocks and forage in the canopy during migration and in winter; they may also breed in the park. Pine siskins show evidence of steep decline in the park in the past decade. In contrast, both the American and lesser goldfinch appear to be increasing, the latter having increased dramatically in the metropolitan area in recent years (Fig. 14).<sup>33</sup> The evening grosbeak and the red crossbill, a TEES Special Status Species, also form noisy flocks and feed in the canopy throughout the park during migration. Red-crossbills also appear to be declining.<sup>33</sup>

## Mammals

Information on the diversity, abundance and distribution of mammals in Forest Park comes from capture surveys,<sup>10,56,57</sup> daytime visual surveys,<sup>53,58</sup> 24-hour motion-detection camera surveys,<sup>59</sup> small-owl prey analyses,<sup>13</sup> large-owl prey and coyote-scat analyses,<sup>46</sup> bat surveys,<sup>60</sup> red tree vole surveys,<sup>61</sup> the BioBlitz for Forest Park Wildlife,<sup>34</sup> oak habitat surveys,<sup>62</sup> and observational records by regional wildlife experts, park staff, trail crews, researchers, users, and neighbors (Table 10). Two reference works on regional mammals, *Natural History of Oregon Coast Mammals*<sup>21</sup> and *Land Mammals of Oregon*,<sup>63</sup> guided the species considered.

The years of field work overlapped for the Lichti (2002–2003)<sup>57</sup> and Dizney (2002–2004)<sup>56</sup> projects, and much of our information on the relative abundance of small mammals is from this brief period. Lichti surveyed at two sites, one each in the Central and North management units, while Dizney surveyed more intensively at only a single upland site in the north along Firelane 10. No trapping has been done in the brushy powerline corridors or the few grassy areas in the park, but some owl and coyote prey items may have been taken from these areas (e.g., rabbits). Motion-detection camera surveys used the length of the Wildwood Trail as a transect and thus surveyed all three management units. Cameras were placed off-trail, and camera surveys complemented the small-mammal surveys by locating meso-predators and flying squirrels. Results of small-mammal surveys for some common species, such as Douglas squirrels and deer mice, were consistent across sources, but other results varied greatly such that species that were



*A northern flying squirrel foraging at night in Forest Park, 2011*  
(Photo: Dan Richardson and PP&R)



commonly detected by cameras or as owl prey were able to avoid capture. Opportunistic observations by neighbors beyond the park boundary and reports from park boundary residents were helpful in understanding elk seasonal movements, and confirming elusive species such as bobcat.

Information on carnivores is conflicting with respect to diversity, abundance, and distribution, because observational information in two management reports from the early 1990s is inconsistent with other reports. For example, one report includes sightings and sign of black bears at 9 of 23 sites during daytime visual surveys,<sup>58</sup> and another reports that black bears were observed at three of four sites on just a few surveys.<sup>10</sup> In contrast, other reports of black bears in the park are rare.

### Bats

Ten species of bat have been recorded for Forest Park; all are native to the region, and six are federally listed species of concern (Tables 5 and 9). The relative abundance, distribution, and habitat use of bats in Forest Park is unknown, but bats have been detected in all three management units. Surveys have been brief and isolated to only a few sites. Both mist-netting and acoustic detection have been used to sample bat diversity. Of the 30 individuals captured, only three were females, half were captured in 1982 on a single night, and 80% were from three species. The hoary bat was the most common species captured, followed by the silver-haired bat and the little brown bat. Sex-bias in the capture data was not unexpected, because male and female bats are known to partition food resources and select different feeding sites.<sup>64</sup> In 2012, three new species of bat (long-eared, long-legged, and Yuma myotis) were detected by Susan Hurley and Justin Hiatt during the 2012 BioBlitz for Forest Park Wildlife.<sup>34</sup>

Bats of this region depend on insects for food, standing water to drink, and structures for roosting. Locally common species such as the long-legged myotis show a preference for large grand fir snags in late-successional forests for roosting.<sup>65</sup> The silver-haired bat also roosts in snags, preferring canopy-topping ones with exfoliating bark, vertical cracks, and cavities.<sup>66</sup> Other bats may use basal tree hollows for roosting, and bats are sometimes found at greater density in fragmented, remnant old-growth stands than in continuous old-growth.<sup>67</sup> Forest Park has many habitat components that are important for bats: streams, proximity to major waterways, bridges, large grand fir, canopy-topping snags, basal hollows, and fragmented old-growth remnants. But the relative density, condition, and distribution of snags, hollows, and other potential

roost sites is unknown, and it is not known to what extent these structures and waterways are being used by bats.

## Rodents

### Squirrels

Six species of sciurids are found in the park and among these, Douglas squirrels and Townsend's chipmunks are native, diurnally active, abundant, and widely distributed.<sup>10,56,57</sup> In addition, the native northern flying squirrel is relatively common in mature conifer stands and widely distributed in the park. The invasive eastern fox and eastern gray squirrels are common along the park perimeter, but both appear to be outcompeted or heavily preyed in the forest interior and are rarely found there. All of the above squirrels are fed upon by owls that breed in the park. Isolated groups of California ground squirrels are known to occur along the Willamette River and near Hoyt Arboretum,<sup>41,55,68</sup> but it is unknown whether any ground squirrel populations are using the park. The native western gray squirrel is often associated with oak habitat, but none have been found in that or other habitats in Forest Park.

### Mice, Voles, and Woodrats

Two species of native mice occur in the park, the deer mouse and the Pacific jumping mouse. The former has been captured or detected as owl prey more than 1,200 times in the park, and is abundant and ubiquitous on the landscape, while the latter is rare and its distribution poorly understood. Part of the discrepancy in capture history may be habitat-related. Pacific jumping mice prefer riparian alder, which has been seldom surveyed. Deer mice are an important prey source for many park species. Deer mice made up two-thirds of the prey animals identified in the combined diets of barred owls, great horned owls, and coyotes in Forest Park in the spring of 2012. Northern pygmy-owls in Forest Park produce larger clutches and more owlets in years when deer mice are especially abundant.<sup>12</sup>

Two species of vole occur in the park, the creeping and Townsend's voles. Both of these are relatively abundant and well distributed. Townsend's are the largest North American vole and often occur at high densities, making them valuable prey for other wildlife species. The red tree vole, a federally listed species of concern, is arboreal, shows a preference for older forests,<sup>69</sup> and is important prey for northern spotted owls in the Coast Range.<sup>70</sup> Although Forest Park habitat appears suitable for red tree voles, targeted surveys in the old-growth forest canopy in 2012 found none.<sup>61</sup> Red tree vole habitat in the north Oregon Coast Range has been



*Deer mouse*

mostly eliminated by logging and stand-replacing fires, and the voles are mostly extirpated from that region, so naturally occurring recolonization of the park is unlikely. Four other vole species may occur in the park, but have never been detected (Table 4, occurrence *undetermined*). Among these, white-footed voles are endemic to Oregon and northern California and of concern at the state and federal levels (Table 9). Forest Park lies at the northern range limit of both the white-footed and red tree vole. White-footed, Townsend's, and long-tailed voles are somewhat associated with riparian alder habitat,<sup>21</sup> which is common in Forest Park but has been poorly surveyed. Gray-tailed voles are a grassland-associated species are thus habitat-limited in the park. Western red-backed voles spend much of their lives below ground or in and under downed logs and stumps,<sup>21</sup> and are not readily detected by terrestrial trapping surveys.

No woodrats (*Neotoma* species) have been reported in Forest Park in recent decades. The habitat may support both the dusky-footed and bushy-tailed species, and the park lies within the range of both.<sup>21</sup> Woodrats are large relative to most small mammals, and are an important food source for many predators including northern spotted owls, bobcats, coyotes, and weasels. At least one regional wildlife expert observed woodrats in the park into the 1980s, and has suggested that non-native rat species may have replaced woodrats in the park.<sup>35</sup>

The North American porcupine is known to occur in the park from observational records of a single live specimen in the central management unit in 2008<sup>54</sup> and a road-killed individual found later that same year on NW Cornell Road.<sup>68</sup> Porcupines are nocturnal and semi-arboreal, and occur in mature mixed-conifer forest where they sometimes gnaw the bark off the boles of trees to eat the cambium layer.<sup>21</sup> Sign of porcupines can therefore be conspicuous despite their nocturnal habits. Porcupines are considered rare in the park and may be mostly absent, but their distribution and abundance is poorly understood.

### **Pocket gophers**

Pocket gophers (*Thomomys* species) are considered absent from Forest Park pending additional targeted surveys. Two species, the Mazamas pocket gopher and the Camas pocket gopher, occur regionally. Pocket gophers may occur in Forest Park, because a few, small, isolated grassy meadows are found in the South (Holman meadow, Birch trailhead), Central (under water towers), and North management units (Keilhorn meadow). Members of this genus have been located in the Tualatin Mountain Range.<sup>10</sup>

### Mountain beaver

Mountain beaver (a.k.a. “boomer”) occur and breed in Forest Park but their distribution and abundance is poorly understood. The lack of records in the park, and the few observed burrows, suggests that mountain beaver may be localized and not well distributed. Boomers are seldom seen because they are nocturnal. Two separate, active burrow chambers were located in the North management unit in 2012 and individual boomers were photographed there. Mountain beavers gather and neatly store food resources just outside of their numerous, burrow entrances and therefore the presence of even a single animal on the landscape is somewhat conspicuous. Mountain beavers feed on foods that are common in Forest Park such as ferns, herbs, young woody shoots, and sapling trees. One burrow entrance in Forest Park contained fresh clippings from Pacific waterleaf and trillium, and another entrance was littered with discarded sword fern stems.<sup>55</sup>

### American beaver

American beaver are relatively common in the Willamette and Tualatin valleys, but are rare in Forest Park. In 2012, during late winter, evidence of recent beaver activity was found in the upper reaches of Doane Creek near the Wildwood Trail.<sup>71</sup> The evidence included a recently felled western hemlock tree, chews, and tracks. No lodges or dams have ever been reported in the park, and park soils and streams do not support bank denning, so beaver do not breed there.

### Lagomorphs

#### Rabbits

Only the brush rabbit has been observed in Forest Park. Rabbits are typically found in brushy habitat along the forest edge, and are seldom seen in the park’s forest interior. Great horned owls and coyotes are known to feed on rabbits in the park.

### Insectivores (Soricomorpha)

#### Shrews

Among the three species of native shrew that occur in the park, Trowbridge’s shrew is widely distributed and the most abundant. Seventy-five percent of all shrews captured in three studies were Trowbridge’s shrew.<sup>10,56,57</sup> They eat a variety of foods that are abundant in the park, including conifer seeds, fungi, mollusks, worms, spiders, and insects.<sup>72</sup> The vagrant shrew, an insectivore famous for its use of echo-location, is also common and well distributed, especially in riparian habitat. The Pacific water shrew is stream-associated and considered rare because its occurrence in the park is based on a single capture record in 2002.<sup>56</sup> Forest Park



*Tree felled by beaver*



lies near the western edge of the broad range of the American water shrew and it has not been found here, but may occur. In addition to the above “true shrews,” the shrew-mole is also relatively common and well distributed in the park based mainly on owl prey analyses<sup>13,46</sup> and dead trailside specimens.

### Moles

Two species of mole inhabit the park, and the coast mole, due to its strong association with forest habitat, is the most abundant and widely distributed. Nevertheless, coast moles have mostly avoided capture, perhaps because they are fossorial (burrowing) and insectivorous, and may ignore typical trapping baits. The much larger Townsend’s mole is usually found in grasslands rather than forests. Nevertheless, an individual Townsend’s mole was captured in the park,<sup>56</sup> several were found in the diet of large owls,<sup>46</sup> and dead specimens are occasionally found .

### Carnivores

Coyote, raccoons, striped skunks, long-tailed weasels, and short-tailed weasels are relatively common and well distributed in the park. All of these species are primarily active at night and are seldom encountered by park visitors. In contrast, several other carnivores are considered rare in the park. Photographic evidence of a single spotted skunk in the central management unit in 2010 is the only record for that species in the park.

Bobcat are secretive and nocturnal, but adults with young have been photographed near Balch Creek. Bobcats breed annually beyond the park boundary along Cedar Mill Creek.<sup>73</sup> Bobcats are presumed to occupy and use the park at the low densities typical for medium-sized, wide-ranging carnivorous species. Cougar have never been reported in the park, but are considered a rare species due to their habitat associations, elusive habits, regional sightings,<sup>74</sup> and occupancy in the Coast Range.



*Short-tailed weasel hunting at night  
in winter in Forest Park, 2012  
(Photo: John Deshler and PP&R)*

Observational records indicate that black bears use the park for short durations about once or twice every 10 years. For example, in 1986 a volunteer trail worker, Bruno Kowalski, reported observing a sow black bear with two cubs along a newly constructed section of the Wildwood Trail between Germantown and Springville roads. Bear sightings in the early 1990s were relatively common<sup>10,58</sup> and may have been of the same individual animal. Since then, black bear have not been reported within the park boundary. Two black bear sightings were among the many wildlife observations collected by upper Rock Creek residents just beyond the northwest park boundary from 2003 to 2006.<sup>74</sup> The park does contain foods

for bears, including succulent shoots, huckleberries, salmonberries, thimbleberries, salal berries, small mammals, nestling birds and eggs, ants, flowers, grubs, and fungi. In most years, no bears or their sign are found in the park. Berry-filled coyote scats and runny deer scat are commonly mistaken for bear scat.

Observations of foxes in Forest Park are rare, and mostly historical. Audubon staff observed an individual red fox moving along the Lower Macleay Trail in late 2011. However, prior to that, a red fox had not been reported since 1991.<sup>58</sup> The regional fox population may have declined due to the historical trapping of foxes on Sauvies Island to prevent waterfowl harassment.<sup>36</sup> Gray foxes have not been reported in the park, but occurred regionally until around 1990.<sup>75</sup>

Gray wolves do not occur in Forest Park, and no historical records for wolves exist because the wolf was extirpated from Oregon by hunting and trapping prior to park establishment. The Coast Range is suitable habitat for wolves, and in recent years a few collared wolves have dispersed hundreds of miles into central and southern Oregon. Only a small fraction of the wolf population in Oregon and the surrounding states are collared. Recolonization of suitable habitat by wolves is a process that can occur rapidly,<sup>76</sup> and wolves may soon recolonize the Coast Range.

## Ungulates

Black-tailed deer and elk both occur annually in the park, which offers forest edge habitat for cover, a few broad trail-less forest interior areas for bedding down, and food. The park lacks extensive grasslands that hold the preferred foods for these species, but does offer a few small grassy areas at Holman meadow, Keilhorn meadow, near trailheads along NW 53rd Avenue, and in utility corridors.

Black-tailed deer are well distributed in the park. Bucks, does, and fawns have been photographed in the park, which can be considered breeding habitat. Deer often travel to and from the park to rural grasslands, and move across Highway 30 to reach habitat along the Willamette River.

Elk occur annually in some seasons. In some years, small numbers of elk will be resident throughout the winter or summer seasons, remaining inconspicuous in the few broad trail-less areas in the North management unit. In places where elk breed, they are often conspicuous and noisy during the fall, because cow elk aggregate into harems, and bulls bugle loudly and often. Elk are seldom observed in Forest Park during the fall breeding season, though two bulls spent several weeks near the extreme southern edge of the park in late summer and early fall 2012.

Near the northern part of the park, Linnton neighborhood residents report annual early winter incursions by elk,<sup>77</sup> and tracks and scat are regularly found along powerline corridors, near Firelanes 12 and 13, in Linnton Park, and near Newton Creek.<sup>55</sup> Skyline area residents also report elk movements in and out of the park along the southwestern boundary, and upper Rock Creek residents regularly see herds numbering from 10 to 50 individuals in their private fields and pastures northwest of the park boundary.<sup>74</sup> Small elk herds are also occasionally seen along the park boundary at Newberry Road, occasionally numbering around 20 individuals.<sup>78</sup> In 2009, a herd of approximately 20 elk moved through the park.

### **Marsupials**

The Virginia opossum is common and widely distributed in and around Forest Park. Opossums are native to the southeastern United States and were first introduced into Oregon around 1915 as released pets.<sup>79</sup>

### **Fish**

Information on fish comes mostly from in-stream surveys by Portland's Bureau of Environmental Services (BES),<sup>15</sup> and from observations by regional wildlife experts. Fish diversity is low in Forest Park relative to other regional waterways and other taxonomic groups in the park. The four species that do occur are native to the region. No fish species are widely distributed in the park, and two federally listed species are found only as juveniles in the lowest reach of Miller Creek in some seasons. Only two species occur and breed in multiple streams. Fish populations are limited in the park by stream conditions, including stream gradients and culverts that prevent upstream fish passage except at Miller Creek.

### **Salmonids**

A small viable population of cutthroat trout is present in Balch Creek. This disjunct trout population has been self-sustaining for many decades. It is unknown whether the current population is a remnant of an historic population that was isolated by culvert construction, or whether trout were introduced to the stream afterward. A few juvenile cutthroat trout, juvenile coho salmon, and juvenile steelhead are occasionally found in the lowest reaches of Miller Creek, and late in 2012, crews collected an adult cutthroat trout there. All three species are presumed to breed there.

### **Cottids**

Reticulate sculpin occur and breed in some major streams in Forest Park, but are absent from Balch and Saltzman creeks.

## Amphibians

Information on amphibians in Forest Park comes from research projects,<sup>80,81</sup> an amphibian monitoring program,<sup>82</sup> surveys by regional amphibian experts,<sup>75,83,84</sup> the BioBlitz for Forest Park Wildlife,<sup>34</sup> and reports from PP&R staff, trail crews, and boundary residents (Table 10). Most surveys were conducted in the Central and North management units. Information on amphibians is often complementary (upland vs. stream surveys), but is sometimes conflicting with respect to the abundance and distribution of terrestrial-, pond-, and stream-breeding species in Forest Park. Interestingly, some fall surveys found gravid female salamanders, suggesting that some amphibians in Forest Park are able to extend the spring season breeding into other wet seasons.<sup>82</sup>

At least seven species of amphibian inhabit Forest Park, including five salamanders and two frog species (Table 6). All amphibians in the park are Oregon native species, and the northern red-legged frog is a TEES Special Status Species. One additional species, the northwestern salamander, may occur in the park, but has not been detected. Amphibian species that require water for egg-laying are limited by the scarcity of ponds and cold, clear streams. Forested habitat is abundant for fully terrestrial salamanders that lay their eggs underground or in rotting logs.

## Pond-breeding salamanders

Rough-skinned newts are locally abundant in the park, but only at a few sites. Newts require ponds for breeding and are found mostly near Balch Creek, due to its proximity to the Portland Audubon Society's pond where hundreds breed each year, and near Miller Creek, where dozens are found annually during dispersal to and from breeding sites. One backyard pond on Newberry Road near Miller Creek is a known breeding site for newts. Terrestrial-phase newts have not been encountered during trapping surveys and terrestrial habitat searches, and are considered uncommon across most of the park. The regionally occurring northwestern and long-toed salamanders have not been detected in Forest Park. Northwestern salamanders breed in nearby ponds and are likely to occur in the park, but adults spend most of their lives underground and are seldom encountered even where they do occur. Egg mass surveys are necessary to determine if this species occurs in the park. Long-toed salamanders are associated with wetlands, small ponds, and meadows, which are rare in Forest Park, so this species is not believed to occur there although it is common in nearby wetlands.



*Western red-backed salamander*



### Stream-breeding salamanders

Coastal giant salamanders are abundant as neonates in the low reaches of major streams in the park, and adults are occasionally found in nearby upland habitat. A single survey in Saltzman Creek in 2011 found 90 juvenile giant salamanders there.<sup>81</sup> The streams in Forest Park are not cold or fast enough to support other regional stream-breeding amphibians such as Cope's giant salamander or Columbia or Cascade torrent salamanders.

### Terrestrial salamanders

*Ensatina* salamanders, Dunn's salamander, and western red-backed salamander are abundant and widely distributed, particularly where large woody debris is shaded by coniferous forest. *Ensatina* salamanders are the most common salamander in upland habitats in the park. Western red-backed and Dunn's salamanders are also common in riparian and upland habitats.

Neither the Oregon slender salamander nor the clouded salamander, which occur regionally, has been detected in the park. The clouded salamander, a climbing salamander and a TEES Special Status Species, occurs regionally in the Tualatin Mountains. This species prefers moist habitats on the forest floor, but is at least semi-arboreal and has been found high up on large snags. Further surveys could discover its presence in the park.

The Oregon slender salamander, a federal species of concern that occurs in the Cascade Mountains of Oregon, has not been detected in Forest Park. However, the habitat requirements and distribution of the Oregon slender salamander are poorly understood, and although this species is most often associated with late-successional Douglas-fir forests in the Cascades, breeding populations have been found in Gresham in narrow riparian buffers of suburban residential areas.<sup>84</sup>

### Frogs

Two resident frogs, the northern red-legged frog and Pacific tree frog, have been captured in undocumented numbers during surveys. Pacific tree frogs appear widely distributed and abundant across the most of the park in moist upland and riparian habitat. At some locations, including lower Maple Creek, large numbers vocalize during the breeding season, creating a chorus that gives this species its alternative name: the Pacific chorus frog.

Northern red-legged frogs, an Oregon vulnerable species and federal species of concern, are relatively common in both riparian and upland habitats in the park. Dispersal distances of up to 2



*Northern red-legged frog found at Springville Creek in Forest Park, April 2012*  
(Photo: John Desbler and Art Colson)

miles are possible for this species, so it is able to breed both in and beyond the park boundary, and to use upland habitats in the park for foraging outside of the breeding season. Many breed in ponds on private lands along the north and northwest boundaries of the park.

Forest Park has no suitable habitat for the rare, sensitive Oregon spotted frog, which occurred historically in the Willamette Valley, and they are not present in the park. The streams are too warm and silty for the regionally occurring coastal tailed frog to be present in the park. The regionally abundant and non-native American bullfrog also does not occur there, due to a lack of sunny, permanent ponds.

## Reptiles

No formal reptile surveys or research projects have occurred in Forest Park so all evidence of reptiles there is based on observations by regional wildlife experts,<sup>75,83,85</sup> many of these from the intermediate past. Only three reptilian species are confirmed for the park, and two are closely related snakes (Table 6). The closed forest canopy limits the amount of available habitat for most species, except live-bearing ones. Egg-laying species rely on direct sunlight to warm their nests, and direct sunlight only strikes the forest floor in profusion along portions of utility corridors, at the historic rock quarry along Highway 30, and at the forest edge.

## Snakes

The common garter snake and northwestern garter snake are known to occur and breed in the park. At the height of summer garter snakes are conspicuous along open utility corridors, and they are occasionally road-killed near the forest edge.

The rubber boa, a constricting snake, inhabits a variety of habitats in Oregon, and though it has not been reported in the park, it may occur there.<sup>85</sup> Rubber boas are found regionally in coniferous forests, and unlike many reptiles, boas are sometimes active at mild temperatures (e.g., 50° F). They will inhabit the forest floor under a closed tree canopy that other reptiles shun, and they give birth to live young. Surveys using methods developed by Hoyer<sup>86</sup> should be able to confirm the presence or absence of this species.

## Detailed Wildlife Information: Vertebrates

### Lizards

Among lizards, only the northern alligator lizard, a live bearer, has been recorded in Forest Park, and only a single specimen from the early 1990s.<sup>83</sup> Forest Park is within the range of the southern alligator lizard, western skink, and western fence lizard, but these lizards have not been detected and the latter two are egg-laying and therefore unlikely to occur.

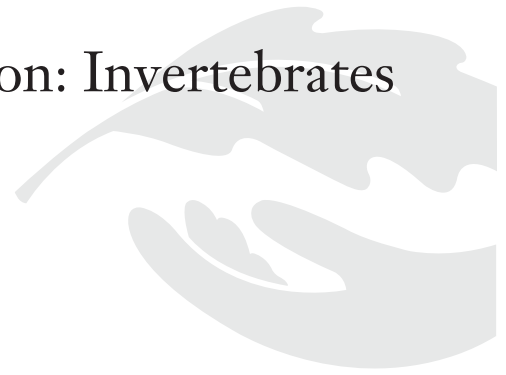
### Turtles

No turtles occur in Forest Park due to the lack of sunny permanent ponds and adjacent open uplands.



*Banana slugs*

# Detailed Wildlife Information: Invertebrates



## Mollusks

Information on the diversity and abundance of most terrestrial slugs and snails in Forest Park comes primarily from a research project at Upper Macleay Park.<sup>80</sup> Additional information on mollusk diversity was collected during in-stream and terrestrial surveys,<sup>15</sup> during the BioBlitz for Forest Park Wildlife,<sup>34</sup> and from observations by park staff and researchers. Surveys for stream invertebrates in Balch Creek are the only source of information on freshwater clams and snails.<sup>15</sup> Surveys targeting aquatic mussels were conducted in the low reaches of some major streams, and none were found.<sup>24</sup>

Most mollusk species in Forest Park are native and terrestrial, and six terrestrial species are relatively abundant (Table 7; Fig. 16). A single species, the Oregon megomphix (*Megomphix hemphilli*) is a species of concern for the Oregon Natural Heritage Program and the U.S. Bureau of Land Management. Some large slugs and snails are abundant and well distributed in the park, but information on small, inconspicuous species are lacking. Details on mollusk ecology in the park are also mostly lacking.

## Slugs

Four species of slug have been documented, and 79% of individuals detected in 2005 were banana slugs. Two taildropper species made up most of the rest of the specimens in that survey. The fact that only a single specimen of European red slug was found was used to suggest that invasive mollusks in Forest Park are being outcompeted by native species.<sup>87</sup> However, the European red slug made up nearly 30% of the slug specimens found during the 2012 BioBlitz<sup>34</sup> and no taildroppers were found during the event. Banana slugs are a common prey item of coastal giant salamanders.

## Snails

Six species of larger snail occur in Forest Park.<sup>87</sup> Although the large, beautifully marked Pacific sideband snail is abundant, well distributed, and often noticed by park visitors, the smaller, pale-green robust lancetooth is the most common snail in the park. The robust lancetooth and northwest hesperian made up 91% of all snails found in surveys in 2005, though only a single northwest hesperian was found during the 2012 BioBlitz. Thus, the limited information on relative abundance of snails is somewhat contradictory, perhaps due to differing moisture conditions at the time of surveys. The Oregon forest snail, a common snail of northwest Oregon forests, has not been found. Although basic

information on snail ecology is known, detailed information on the ecology of snails in the park is lacking. Barred owls preyed upon Pacific sideband snails in 2012, sometimes swallowing the entire snail and shell whole, later regurgitating the unbroken snail shell within a pellet of discarded fur and bones from other prey items.<sup>46</sup>

### Microsnails

Among the seven species of microsnails, three species contributed 85% of total abundance in one survey (Fig. 16). Microsnails are an inconspicuous and poorly understood group of park wildlife. Most microsnails are semelparous, breeding only once in their lifetime, and die within a year.

### Aquatic bivalves and snails

Freshwater bivalves, mussels and clams, have complex life cycles and can be exceptionally long-lived. In some ecosystems they function as important food resources, and their filter-feeding cleans bacteria, algae, and sediment from waterways. Three species of aquatic snail and clam were found in Balch Creek in 2011.<sup>15</sup> Surveys of major park streams for aquatic mussels, including floaters (*Anodonta sp.*) and western pearlshells, found none.<sup>24</sup> Data from other streams in the park are lacking.

### Arthropods

Information on the diversity of insects, spiders, millipedes, springtails, crustaceans, and other arthropods comes primarily from annual surveys for wood-boring insect pests,<sup>88,89</sup> regional entomologists participating in the BioBlitz for Forest Park Wildlife,<sup>34</sup> stream invertebrate monitoring in Balch Creek,<sup>25</sup> and riparian monitoring.<sup>15</sup> A few additional species identifications have been contributed by park staff and researchers.

More than 440 species have been placed in an inventory for the park (Table 11). However, our understanding of insects and their allies remains poor relative to vertebrate wildlife. For example, although more than 50 mosquito species occur in Oregon, none have been identified to species in the park and placed in our inventory. Thus, we not only lack information on relative abundance, distribution, and ecology of most arthropods in the park, but our best estimate of diversity is certainly low.

About 10% of the arthropod species documented for the park are non-native,<sup>26</sup> and their impact is poorly understood. Several spiders, ants, beetles, and moths in the park have their origins in Europe and Asia. A few of these are a bark beetle (*Xyleborinus saxesenii*), a common woodlouse (*Oniscus asellus*), a pavement ant



*An eight-spotted skimmer, a dragonfly, from the BioBlitz for Forest Park Wildlife, 2012*  
(Photo: Rachel Felice with Robert Richardson and Brendon Boudinot)



(*Tetramorium caespitum*), a spotted-wing fly (*Drosophila suzukii*), and a crab spider (*Philodromus rufus*).

The most diverse, conspicuous, and abundant groups of arthropods are highlighted below.

### Arachnids

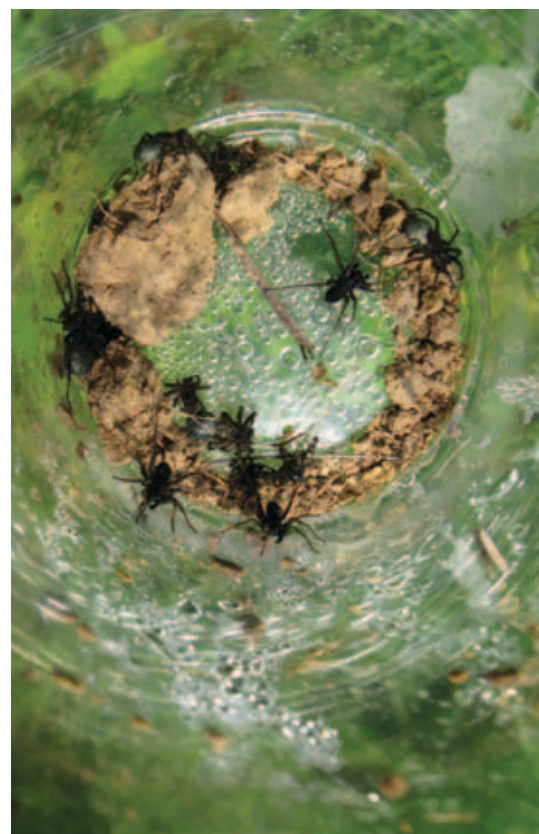
All information on arachnids is from the 2012 BioBlitz for Forest Park Wildlife. Eighteen species of arachnids were collected, and these are mostly spiders and harvestmen (Table 11). Spiders are abundant and become conspicuous, especially the orb-weaving species, during the summer months. Systematic arachnid surveys are lacking, and no pseudoscorpions, a common, diverse, and abundant taxonomic group, have been documented. Similarly, ticks and mites have not been well accounted. Only a single tick species has been documented (*Ixodes sp.*), even though 13 more species of *Ixodes* occur in Oregon, each with a specific host preference.

### Centipedes and millipedes

Four species of millipede and two centipedes are known to occur in Forest Park, and there are probably many more. The clown millipede, *Harpabe haydeniana*, is distinctive for its aposematic coloration: bright yellow spots on a black or dark brown background. The clown millipede is able to release hydrogen cyanide as a defense against predators, which may allow it to be active during the day. Other millipedes, such as an all-dark cylindrical spirobolid millipede, are typically nocturnal. One ground beetle found in the park, *Promecognathus crassus*, is a specialist predator of the clown millipede; the Dejean's night-stalking tiger beetle (*Omus dejeani*) and *Pterostichus lama* have also been observed feeding on this species. Studies at the H.J. Andrews Experimental Forest, located in the Cascade foothills east of Eugene, suggest that the clown millipede is a keystone decomposer.<sup>90</sup>

### Springtails (Collembola)

Although long regarded as primitive insects, springtails are now treated as a separate class of six-legged arthropod (Hexapoda). Springtails occur in Forest Park, but none have yet been identified to species. These small arthropods get their common name from an appendage that hooks under the abdomen, acquiring such great muscle tension that it hurls the springtail into the air 30 times or more its length. Springtails are important components of forest floor food web, and can be incredibly abundant within the upper soil layers and within decomposing leaves, needles, and wood. Some species of pseudoscorpion and beetle are specialist



*Wolf spiders collected in a container during the 2012 BioBlitz*

springtail predators. Recent research also shows that springtails are important in the transportation of moss spores, acting in a similar manner to bees pollinating flowers.<sup>91</sup>

### Insects

#### Beetles

Beetles are among the most diverse orders of animals in the world, and are the most diverse group documented in Forest Park at nearly 200 species (Table 10). Over 5,000 species occur in Oregon, and the full diversity in Forest Park is certainly greater than currently documented. Most beetle surveys in Forest Park have focused on the northeastern edge near the Port of Portland in attempts to detect wood-boring, non-native pests that could harm Oregon forests. Beetle families that were not the target of those surveys are underrepresented. For example, over 80 species of lady beetle occur in Oregon, but only three species have been identified in the park. Other diverse families in Oregon are also currently underrepresented, such as the Chrysomelidae (leaf beetles) and Staphylinidae (rove beetles).



*One of the many beetles found during the 2012 BioBlitz*

The great species diversity of beetles is also reflected in the diversity of their ecological roles. Beetles are important decomposers, particularly of dead wood and vegetation, animal waste, and carrion. For instance, larvae of two families well represented in Forest Park, the Buprestidae (flatheaded borers and jewel beetles) and Cerambycidae (long-horned beetles), bore under the bark and into the wood of shrubs and trees. Although most species attack severely stressed, dying, or recently dead trees, some are notable for attacking and possibly killing healthy hosts. Beetle activities such as these help create coarse woody debris and snags, key habitat components that benefit many vertebrate species. The adults of many beetles also are important pollinators. Some beetle species even mimic the colors of wasps and bees, such as the black-and-yellow-banded long-horned beetles in the genus *Xestoleptura*. The larvae of jewel beetles and long-horned borers are well known as important food for woodpeckers and other wildlife, comprising nearly one-third of the diet of hairy woodpeckers in some locales.<sup>92</sup> Bark beetles burrow through bark and produce the familiar gallery tunnels in the sapwood immediately inside the bark of trees and shrubs. Beetles often thought of as wood-feeding actually feed on fungi instead. Most wood-boring species have one or more associated symbiotic fungi which are either food for larval beetles, or are important for reducing tree defenses. One species that occurs in Forest Park, the Douglas-fir beetle, *Dendroctonus pseudotsugae*, sometimes attacks and kills healthy trees. In some cases in western Oregon, trees have been killed over large areas.<sup>93</sup>

Ambrosia beetles, a group of bark beetles, bore directly into the sapwood and sometimes even the hardwood. Some ambrosia beetles are restricted to just one or two plant genera. For instance, the only hosts of the oak ambrosia beetle, *Monarthrum scutellare*, are oaks and their relatives. Without oaks in the park, this species would be absent.

Predation is a common foraging strategy for beetles, particularly in the families of ground beetles (Carabidae), soldier beetles (Cantharidae), lady beetles (Coccinellidae), and rove beetles (Staphylinidae). Soldier beetles and lady beetles are particularly noted for preying upon soft-bodied plant-feeding insects such as aphids and help control these populations. Members of the genus *Scaphinotus* readily feed on snails and slugs, regurgitating digestive enzymes onto the flesh of their prey and slurping up the resulting “escargot soup.” Another ground beetle, *Promecognathus crassus*, is a specialized predator of the clown millipede and related millipedes. Although its prey is often three times its length and 5 to 10 times its weight, this beetle easily and quickly subdues the millipedes through an elegant and sophisticated prey capture behavior. Some soil fungal feeders are so adapted to their habitat that they are completely eyeless, including *Pinodytes newelli*, found during the 2012 BioBlitz. While we generally think of lady beetles as aphid-eating machines, one of the three species documented from Forest Park is *Psyllobora vigintimaculata*, which feeds on mildew.

### **Ants, bees and wasps**

Hymenopterans are a fairly diverse order of insects in Forest Park, currently represented by four families and 19 species, mostly bees and ants. Ants are conspicuous at the forage edges and in disturbed area due to their abundance. At least nine ant species are found in the park. Two of the most readily encountered species are non-native, the odorous house ant (*Tapinoma sessile*) and the pavement ant (*Tetramorium caespitum*). The thatching ant, *Formica obscuripes*, is also noticeable because of the large mounds of plant debris over nest entrances. Ants consume a wide variety of foods in the forest including the honeydew from aphids. Some ant species, like some beetles, cultivate fungi as a food source. Carpenter ants, represented in Forest Park at this time by a single species, *Camponotus modoc*, provide a crucial step in the decomposition of wood by excavating galleries for their colonies within standing snags, downed woody debris, and stumps. The carpenter ants don’t consume wood; they just chew out cavities in which to live. Ants and their larvae can be an important seasonal food for many other wildlife species, including woodpeckers.



Bees and wasps are important pollinators in the park, and are more diverse than ants in Oregon. Most species are solitary. Bumblebees (*Bombus* sp.) are a relatively diverse genus, with four species currently documented in the park. Yellow-jackets (Vespidae), which are wasp species, also occur in the park. Some of these wasps create the familiar football-shaped nests that hang from tree branches, and others nest in the ground. Two of the families of wasps known from Forest Park, Cimicidae and Tenthredinidae, are sawflies. The larvae of these primitive wasp species feed on the foliage of shrubs and trees. Others bore within dying and dead trees, similar to the larvae of wood-boring beetles. Occasionally, the conifer-feeding Tenthredinidae species can defoliate large areas, though this has not occurred in the park.

### **Moths and Butterflies**



*Swallowtail butterfly*

After beetles, species in the order Lepidoptera are the most diverse group of animals in Forest Park. One hundred fifty species from 25 families of moths and butterflies are currently known to occur and many of these are abundant. Adult moths and butterflies are important as pollinators, especially of night-flowering plants. Adult moths are also important food for wildlife, including bats, flycatchers, swallows, and pygmy-owls. Larval forms are important consumers of plant material and are food for wildlife species at all levels of forest structure. Warblers and chickadees pluck caterpillars from shrubs and the tree canopy, and thrushes, sparrows, frogs, and shrews ply them from the forest floor. Larval lepidopterans are voracious herbivores and some species, such as spruce budworms and tussock moths, can act as defoliators, typically of ornamental rather than native plant species. The western tent caterpillar, *Malacosoma disstria*, has periodic outbreaks and defoliates host trees, but rarely has lasting detrimental effects to tree health. The conversion of plant biomass into caterpillars and their excrement is an important cycle for forest health. Several species of the moth in the park are non-native, including the beautifully patterned cinnabar moth (*Tyria jacobaeae*). Recent surveys in the park by the Oregon Department of Agriculture (ODA) and the USDA for the Asian gypsy moth, a serious forest pest, have found none, but gypsy moths were found and eradicated in years past.

### **Stoneflies, Mayflies, and Caddisflies**

Stream invertebrates in Balch Creek are an important food for many other species, especially the cutthroat trout and the juvenile coastal giant salamanders there. Depending on the year, 20 to 70 individual insects are found in a single square foot of streambed in Balch Creek.<sup>25</sup> Seventeen families of caddis-, may-, true-, and

stoneflies are known to occur there, and although the family richness is relatively even among these groups, abundance is heavily weighted toward mayflies (Figs. 19 and 20). For the collection of all stream invertebrates in Balch Creek, including amphipods, annual abundance follows climatic cycles (Fig. 21). Precipitation, driven by climatic cycles, brings nitrogen into the stream, and increased nitrogen negatively affects invertebrate populations there.

## Worms

Information on worms in Forest Park is scant. The common earthworm (*Lumbricus terrestris*) is known to occur, and aquatic oligochaete worms are found in Balch Creek. Worms can be important food for birds and other wildlife, and aquatic species are sometimes eaten by juvenile giant salamanders.



*Data being collected during the 2012 BioBlitz in Forest Park*



*Band-tailed pigeon adult and juvenile on nest*  
(Photo: Scott Carpenter)

# Threats to Forest Park Wildlife



The 1995 *Forest Park Natural Resources Management Plan* establishes two conservation goals that are particularly relevant to wildlife. The first regards a trajectory for park management that creates an ancient forest ecosystem and protects animal communities. The second mandates the design of restoration projects that (1) maintain and enhance regional biodiversity, (2) provide wildlife habitat for both resident and migrant species, (3) improve aquatic habitat, and (4) repair damaged and fragmented natural systems. Through park management efforts, several goals have been achieved and some others are pending, but several threats also exist that may hinder the park management trajectory with respect to wildlife:

- Climate change
- Non-native invasive plants
- Non-native invasive insects and other wildlife
- Habitat alteration outside of the park
- Utility corridor management (habitat alteration within the park)
- Illegal park activities: homeless camps, rogue trails, nocturnal recreation
- Domestic cats at the park perimeter
- Air pollution
- Water quality degradation in Balch Creek
- Parasites, poisons, and persecution
- Fire and fire management

## Climate Change

Perhaps no greater threat exists to the stated goal of growing an ancient forest and to the wildlife that would inhabit it than climate change. Regional scientists and natural resource agency directors have recently published *The Oregon Climate Change Adaptation Framework*<sup>94</sup> and the *Washington Climate Change Impact Assessment*<sup>95</sup> outlining the possible effects of climate change on the region over the next 40 to 50 years. The effects mentioned are pertinent to the habitat and the wildlife in Forest Park, and the ones below have been deemed *very likely*, *likely*, or *more than likely* for Oregon:

- increase in average annual temperatures and the likelihood of extreme heat events
- changes in the timing and quality of available water
- increase in wildfire frequency, intensity, and extent
- increased incidence of drought
- loss of wetlands
- increased frequency of extreme precipitation events and flood magnitude
- increased landslides



Based on the above, the Oregon report predicts that some wildlife and plant species will undergo both latitudinal and elevational shifts in their geographical distribution. Some species are predicted to decline in abundance or become locally extinct. In particular, species that are strongly associated with aquatic, wetland, and riparian habitats are predicted to suffer detrimental impacts as stream flows are reduced and droughts increase. Fish and amphibians are therefore most directly vulnerable to changes in climate. The impact of climate change on park habitats, especially water availability, will alter the diversity and abundance of all wildlife groups, including mammals and birds that rely on daily water intake, and on the plant and insect food sources near the bottom of the food web. Insects, including non-native pests, will likely increase in abundance annually as average temperatures gradually rise. Furthermore, the life cycle of plants and animals may become offset such that leaf emergence, flowering, and fruiting are no longer timed to match the appetites of larval moths and migratory birds, or the development of bee colonies. Fruit-bearing plants are likely to suffer poor crops and become less available as food for many species, from coyotes and deer to waxwings and thrushes. Because Forest Park is a relatively isolated forest fragment, any species losses will be difficult to regain through recolonization.

### **Non-native Invasive Plants**

Invasive plants are among the greatest threats to wildlife diversity and abundance in the park, and are likely to remain so well into the future. Non-native invasive plants, particularly English ivy, English holly, and Himalayan blackberry, can reduce diverse, native plant communities to indistinct monocultures of a single or few groundcover or shrub species. When invasive plants are not controlled, the resulting lack of floristic diversity is particularly detrimental to arthropod diversity, but it is likely to have broad negative impacts on the distribution and abundance of vertebrate wildlife too. PP&R staff (the Protect the Best Program and City Nature West), Portland's BES crews, and volunteers and staff at the No Ivy League and the Forest Park Conservancy are currently engaged in activities to control the spread and establishment of invasive plants in Forest Park. This annual work has been effective at reducing and controlling many invasive plants, particularly at sites rated "healthy," "good," or "fair" condition (i.e., the "best" sites to be protected), and at volunteer-accessible sites. Through the Protect the Best Program from 2007 to 2012, from 750 to 1,000 acres have been treated or retreated annually in Forest Park.<sup>96</sup> From 2009 to 2011, over 3,000 park acres received a one-time treatment

of weedy trees such as English holly and laurel and invasive vines including English ivy and clematis. Comprehensive treatment of invasive species in the understory has not been accomplished throughout the park. If this work is not undertaken then the initial investment made in invasive species treatment will be lost. To sustain current wildlife populations, invasive plant treatments and retreatments are necessary on an ongoing basis to prevent invasive plants from dominating the ecosystem. The expansion of treatments into the remaining park acreage, especially near the park boundary, will best serve to meet the park management goals stated at the beginning of this section.

## Non-native Wildlife

## Invertebrates

Non-native, wood-boring insects, especially moths and beetles, are among the biggest potential threats to Forest Park. The close proximity of the Port of Portland facilities to the park increases the risk of introduction of these insects. Introduced species, such as gypsy moths (*Lymantria dispar*), have decimated otherwise healthy forests in regions of the Pacific Northwest. Asian long-horned beetles are particularly prone to destroying maple trees, a dominant tree class in the park. The Douglas-fir beetle, *Dendroctonus pseudotsugae*, a species that occurs in the park, sometimes attacks and kills healthy trees, and occasionally destroys broad swaths of forest. In recognition of these threats, both the ODA and the USDA-APHIS (Animal and Plant Health Inspection Service) have monitored sites in Forest Park for the presence of non-native insect pests for more than 10 years, and these efforts are ongoing. While some forest threats are known, and in some cases the displacement of native species by invasives is well documented, the ecological impacts of invasive arthropods are most often poorly understood.



*Gypsy moth is an introduced species*

## Vertebrates

Most of the park's vertebrate wildlife are native species, and the relatively few non-native species tend to be restricted to park boundary areas. A few non-native species are threats to the native forest interior species with which they compete. Barred owls are a relatively recent addition to Oregon forests and are well established as breeding year-round residents in the park.<sup>46</sup> Barred owls outcompete the closely related and native northern spotted owl and may prevent their recolonization of the park regardless of whether the habitat succeeds to old-growth condition.<sup>53</sup> Similarly, invasive Norway rats appear to have displaced native woodrat species at the park perimeter, and no woodrats have been detected in the park in decades. Woodrats were formerly common at the park edge.

Woodrats are an abundant and valuable ecosystem component in some regions, both as food for many avian and mammalian predators, and as microhabitat engineers that build massive aboveground nests out of forest debris. Also among rodents, non-native tree squirrels now dominate the forest perimeter and occasionally penetrate the forest interior. Eastern gray and fox squirrels have displaced native western gray squirrels in many habitats, and compete strongly with other native sciurids where their territories overlap. Large patches of late-successional, interior, coniferous forest are still dominated by native squirrel species such as the Douglas and northern flying squirrels, and preservation of these habitats remains important.

### **Habitat Alteration Beyond the Park Boundary: Population Isolation and Loss of Foraging and Breeding Areas**

Development guidelines set forth by the Skyline West Conservation Plan<sup>97</sup>; land acquisition by Metro, PP&R, and the Forest Park Conservancy; and efforts by Washington County residents (e.g., the Save Helvetia campaign) have protected some natural areas and rural lands surrounding Forest Park from development. However, much of these surrounding lands remains privately held and at risk of conversion. The loss of habitat for foraging and immigration, and the potential isolation of terrestrial wildlife populations is an ongoing threat to their persistence in the park. Population isolation is often heavily influenced by large-scale habitat alteration, and has already factored into the extirpation of some species from the park.

Some wide-ranging species of Forest Park wildlife are currently able to disperse to and from the park to regional grassland, pond, riparian, and coastal forest habitat by crossing the southwestern and northwestern park boundaries. The availability of these unprotected habitats is important for many species. Several reports from the intermediate past have tended to focus on the preservation of *forested* lands beyond the northwestern park boundary.<sup>10,58,97</sup> However, the pastures, agricultural lands, streams, and ponds across Skyline Boulevard may be even more important to northern red-legged frogs, deer, elk, and other wildlife species. Northern red-legged frogs are known to breed there. Band-tailed pigeons that breed in the park forage there. Ungulates prefer the ecotone between the grasslands and forests, where they can move back and forth between the relative safety of forest cover and the more open foraging habitat. The protection of habitat beyond the park boundary is therefore a key to maintaining certain species

within the park. Future residential and commercial development beyond the park boundary in the natural areas of Skyline West, upper Rock Creek, and Tualatin Hills may have negative impacts for wide-ranging species that also use the park.

The already noted declines in local avian populations may be especially influenced by habitat loss at broad scales, including the continental scale. Migratory species in particular require adequate foraging habitat and cover at migration stopovers and overwintering grounds, and these habitats may be hundreds or thousands of miles from their breeding habitat in Forest Park.

## Habitat Alteration Within the Park Boundary: Utility Corridor Management

Forest Park is a protected natural area with easements for the construction and maintenance of utility facilities. Powerline corridor maintenance activities by regional utility companies sometimes result in extensive removal of shrubs and trees, as well as soil compaction. Recent shrub damage along the BPA Road in Forest Park in 2012 is an example. Shrub habitat is relatively uncommon and important in the park, and the wildlife species that use it are often localized breeders. The removal of shrubs during powerline corridor maintenance reduces breeding habitat for sparrows, thrushes, and warblers, and razes flowering plants that are important to hummingbirds, moths, bees, and other pollinators. In some cases PP&R has worked successfully with utility partners such as Kinder Morgan to analyze and modify right-of-way maintenance activities such as tree cutting, and thereby substantially reduce habitat losses. Habitat losses have also been mitigated by topping rather than cutting down some trees, leaving branchless boles standing to become snags, an especially valuable wildlife habitat component.

## Illegal Park Activities: Transient Campers, Rogue Trails, Nocturnal Recreation, Plant Harvest

Illegal park activities may be particularly detrimental to wildlife, and such activities are not considered uncommon. Many illegal activities involve off-trail movements, which disturb wildlife and destroy habitat. Users that stay on designated trails are ignored by many wildlife species, especially smaller ones.

Transient campers, who invade all areas of the park, but are particularly common near Balch Creek and the northeastern edge, pose many threats to wildlife. Transient campers build cooking fires that may become wildfires. They create camps in



*Illegal campsite*



inconspicuous, off-trail areas and may drive wildlife out of these otherwise unpeopled large, forest fragments. They also destroy habitat, build structures and trails, defecate and urinate near streams, and are sometimes active at night.

Forest Park is officially closed from 10 PM until 5 AM. Nighttime activities disturb wildlife, particularly terrestrial mammalian species, a majority of which are nocturnal, and thus forage, travel, breed, and rest at night. Many arthropods, salamanders, and mollusks are also nocturnal and commonly use trails at night, where they cannot be avoided in the darkness and are susceptible to being crushed. The extent of this disturbance and the frequency of this illegal activity are poorly understood. But nighttime cycling is considered to be somewhat common by some park users, and has been admitted by some cycling advocates.<sup>4</sup>

Similarly, geocaching has become a popular pastime, and one that openly encourages participants to place and pursue caches in off-trail areas and to be active in the park at night. Based on the geocaching.com website (2012), more than 75 geocaches are currently hidden in Forest Park, and many of these are off-trail. PP&R supports geocaching and has recently reached an agreement with geocaching.com to allow a maximum of 10 geocaches in each of the Central and South management units. All geocaches must be within reach from the tread of the trail. All other geocaches are to be removed and will no longer be displayed on the geocaching website, including all those in the North Management Unit and all off-trail caches.

Rogue trail creation is a relatively uncommon occurrence in the park, but has occurred at multiple sites in recent years.<sup>4</sup> In some cases, trails result from the expansion of existing deer trails, or from human or biking trails near the park boundary. In another case, trees were cut down, streambanks were modified, and a mile-long trail was constructed. Rogue trails further fragment the park and their use disturbs wildlife, particularly elk and other large mammals that tend to use the few larger, trail-less areas in the North Management Unit for foraging and resting during winter and early spring following fall breeding. PP&R has worked to deconstruct these trails and restore habitat as they are found.

Illegal plant harvesting in Portland's natural areas is somewhat common, and typical targets are nettles (*Urtica dioica*) and salal (*Gaultheria shallon*). Like several threats, the extent of this problem and its impact on wildlife is poorly understood, but birds and mammals feed on salal berries and will nest under and within salal cover.

## Domestic Cats at the Park Perimeter

Feral or otherwise free-roaming domestic cats are a serious, direct threat to birds and small mammals in many habitats.<sup>98,99</sup> Approximately 40% of intakes at the Portland Audubon Society Wildlife Care Center in 2011 were either injured or orphaned by house cats.<sup>100</sup> But the extent of the domestic cat impact on park wildlife has not been quantified. Domestic cats commonly prey upon songbirds, squirrels, shrews, voles, and mice, especially recently fledged birds, and all of these are common in the park. Free-roaming domestic cats living along the park *perimeter* are likely to kill small birds and mammals that forage and breed there. However, motion-detection camera surveys and observational accounts indicate that feral cats do not roam the *forest interior* and cat colonies are not established there,<sup>59</sup> perhaps because bobcats, raccoons, coyotes, and other wildlife are controlling the cat population. Some coyote scats collected within the park in 2012 were found to contain domestic cat bones and claws, suggesting that coyotes are among the species that control free-roaming cats, though the data sample was small ( $n = 30$  scats). Cats were a minor portion of coyote prey. In 2012, more than 80% of the coyote vertebrate prey items found in scats were rodents, shrews, and moles, and a few large mammals such as deer contributed disproportionately to coyote prey biomass.<sup>46</sup>

The extent to which dogs pose a threat to Forest Park wildlife populations is less well understood, and is considered a *gap* more so than a *threat*. Unlike domestic cats, the impact of domestic dogs on wildlife is often behavioral rather than lethal. Scent-marking by dogs along trails can cause some mammalian wildlife such as deer to use trail corridors less often, but may cause coyotes and foxes to investigate trails more often. Trailheads where both human and dog activity are heaviest tend to be avoided by some mammalian wildlife.<sup>101</sup> In 2011, approximately 3% of intakes at the Portland Audubon Wildlife Care Center were dog-caught.<sup>100</sup> The addition of a full-time ranger for Forest Park, the implementation of a volunteer park ranger program, and increased signage has led to a gradual reduction in the number of warnings and citations issued to park visitors for having dogs off-leash.<sup>102</sup> Based on motion-detection camera studies, no free-roaming domestic dog packs occur in the Forest Park.<sup>59</sup> Nevertheless, some leashed and unleashed dogs walking with human companions will dig for and dispatch moles, chase trailside squirrels and birds foraging on the forest floor, and bark at the scent or presence of mammalian wildlife such as coyote, deer, and raccoons. Numerous dead coast moles are found along park trails each spring and a few moles



*Coyote at night in Forest Park, 2010*  
(Photo: Dan Richardson and PP&R)



*Townsend's mole*

are known to have been killed by dogs.<sup>55</sup> Mole specimens also die in spring due to flooding of burrows and the destruction of earthworms.<sup>103</sup> Stream impacts by dogs, including disturbance of fish and salamanders and stream-bank degradation, are often concentrated near the short segments where trails intersect streams perpendicularly. The Lower Macleay, Chestnut, and Nature trails parallel stream reaches for relatively long lengths, and therefore wildlife in and around Balch and upper Rocking Chair creeks are prone to disturbance by both dogs and humans that enter the creek.

### Air Pollution

Forest Park is adjacent to some of the areas of poorest air quality in the Portland airshed. Recent studies at Portland State University (PSU) through the Center for Life in Extreme Environments (CLEE) and Center for Climate and Aerosol Research have investigated the changes in lichen composition over the past 20 years in a comparative diversity study.<sup>104</sup> Air pollution has been documented to alter lichen community composition, species distribution, physiology, or appearance. Initial results from this study show altered lichen communities, with fewer air-quality-sensitive species present at study locations throughout the park. Additionally, individual lichen structure shows signs of poor air quality in reduced physiology of the vegetative body of the lichen (thallus). This emerging data will be informed further by subsequent field research by CLEE laboratory. Currently, wildlife impacts are unknown and are not a research component of the research, but it is anticipated that a reduction in lichen and moss species diversity, abundance, and quality of individual structures may adversely impact wildlife that nest in, live on, and rely upon lichens as a primary food source, as food source habitat (e.g., insects and arthropods living in moss and lichen patches), or as nesting material (e.g., northern flying squirrels).

### Water Quality Degradation in Balch Creek

As already noted, water quality in Balch Creek has declined in recent years, especially with regard to dissolved solids, ammonia, and bacterial load.<sup>104</sup> Balch Creek is the largest park watershed and supports an abundance and diversity of stream macroinvertebrates and other wildlife species such as cutthroat trout, American dipper, and great blue heron that are uncommon elsewhere in the park, and that rely on the aquatic environment. Balch Creek is also especially important to terrestrial wildlife because it is the only perennial stream in the South Management Unit. Numerous management plans have been developed in recent decades that

highlight the value of Balch Creek to wildlife, the ongoing concerns about water quality and habitat, and the need for ongoing management efforts there.<sup>8,106,107,108</sup>

Approximately three-fourths of the Balch Creek watershed is beyond the protection of the park boundary and the Audubon sanctuaries, so the ongoing support of private individuals is also necessary to sustain the creek's ecological health.

## Parasites, Poisons, and Persecution

The recent outbreak of avian botulism that killed thousands of birds at a northeast Portland wetland not far from Forest Park demonstrates the seriousness of the threat of disease for wildlife. For some wildlife species, body condition and disease can be related to human effects. In one study, urban coyotes with higher rates of mange (*Sarcoptes scabiei*) also consumed significantly more anthropogenic foods, whereas healthy coyotes consumed more natural prey.<sup>109</sup> In another study, 95% of 60 bobcats that ranged in both urban and natural habitats showed exposure to “alarming rates” of the anticoagulants used in rodent poisons.<sup>110</sup> These studies highlight the potential for negative human impacts on wide-ranging park wildlife species, especially the few remaining large carnivores that occupy the top of the food chain in the park.

Persecution of species can also be a threat to their existence in Forest Park. Pocket gophers and coyotes are two of the many examples of species that continue to experience intense persecution by humans, despite their ecological function and value. Pocket gophers are ecological engineers that aerate the soil, cycle nutrients, create burrows that are used by dozens of other species, and feed on herb roots, helping to maintain the grass habitats where they occur.<sup>111</sup> Coyotes in the Forest Park ecosystem are a top predator, and as such may *benefit* many other wildlife species through trophic cascade effects.<sup>112</sup> Both of these species are commonly targeted by animal control operators in response to human complaints, real or otherwise. Continued persecution within urban habitats where wildlife population densities are sometime relatively low can lead to species losses.

## Fire and Fire Management

Three stand-replacing fires in and around Forest Park in from 1889 to 1951 suggest that fire remains a threat to the forest and to wildlife. The *Forest Park Wildfire Risk Reduction Final Report* outlines 13 projects and provides other guidelines to manage fire risk in Forest Park.<sup>113</sup> The risk of catastrophic fire in Forest Park is so

strongly mitigated by the abundance and distribution of hardwood tree species, especially bigleaf maple, that no management actions have been implemented at this time. Because Forest Park is ringed by residential and commercial properties, wildfires in the park are closely monitored and in most cases, immediately extinguished. The eastern park edge is considered to be at higher risk for wildfire than other areas due to a combination of factors including slope, aspect, fuel loads, easterly dry-season winds, homes, industrial businesses, the railroad, and transient camps.

Wildfire, including stand-replacing fires, can be both beneficial and detrimental to wildlife, depending on the species being considered, and the size of the forest area affected. Stand-replacing fires create forest openings that may ultimately be attractive to species such as quail, woodpeckers, bluebirds, clouded salamanders, and elk.

Wildfire risk management actions, including those actions recommended in the wildfire risk assessment, can also be both beneficial and detrimental to wildlife. Protecting the forest from catastrophic fire maintains the status quo and protects wildlife. However, risk management actions call for the removal of *forest fuels*, a term that includes any living or dead plant, but especially dead, woody species and fire-prone live evergreen trees, including grand fir. The removal of large grand fir trees could be detrimental for some Pacific Northwest bat species for which it is the preferred roost structure.<sup>65</sup> And removal of other forest fuels could be detrimental to wide variety of wildlife species from all classes, because downed logs and snags are important cover, foraging substrate, and nesting structure for many species including salamanders, shrews, voles, woodrats, woodpeckers, squirrels, owls, brown creepers, chickadees, swifts, and weasels.



*Red-breasted sapsucker*  
(Photo: Scott Carpenter)



# Gaps and Next Steps



While much is known about Forest Park wildlife, much remains to be known. For some taxa, the following basic information is lacking:

- Diversity
- Abundance
- Breeding
- Distribution
- Habitat use and availability of key habitat components
- Seasonality
- Population trends
- Ecology
- Threats to population persistence

This is especially true for invertebrate animals, about which fundamental questions of diversity remain, and which are important to all aspects of park ecology. In other cases, knowledge gaps are more complex. Data are sometimes lacking on the reproductive success of species of concern, wildlife response to management actions, or whether non-native animals are impacting native species. Perhaps most importantly, information is lacking on a populations trend over time, especially for TEES Special Status Species, uncommon species, and those with home range requirements that extend beyond park boundaries. Where monitoring has occurred, many common and seemingly abundant species appear to be in decline, some others appear stable, and relatively few are increasing in abundance.<sup>33</sup> Results like these demonstrate the importance of ongoing monitoring.

Collecting data on complex questions can be time-consuming and labor- intensive, and a robust understanding of even a single species' population, habitat use, and breeding biology within Portland parks can take several years.<sup>12,31</sup> With more than 150 vertebrate species and perhaps thousands of invertebrate ones, it is not possible to know everything about all species. Nevertheless, key information on wildlife remains important for park management and is of interest to the public and the academic community. To guide future efforts on wildlife research in the park, a table of gaps and next steps has been developed (Table 12).

## Mammals

Data on mammalian diversity in the park is relatively robust, and none of the rodents, carnivores, insectivores, ungulates, or rabbits known to breed there are special-status species. A review of the basic information on mammals makes clear that although bats

## Gaps and Next Steps



*Red fox*

make up nearly one-quarter of the park's mammalian species, they are the least understood group. Because the park is mostly interior forest, it is sometimes dismissed as less than ideal habitat for bats, but 10 bat species are known to occur there, and eight are special-status species. Collecting data on the abundance, breeding, distribution, ecology, and, especially, habitat use of bats in the park is a priority.

Data on population trends among mammals in the park is absent, and relative to the solid information on avian trends this stands out as an important gap. A few studies indicate that the deer mouse population may experience boom and bust years in the park, and that these fluctuations may have impacts on both their food resources and the breeding success of their many predators.<sup>12,46,56</sup> But not even the hint of such trends or cycles is available for other mammalian species. Population trend data are important for detecting potential species losses of rare animals such as porcupine and spotted skunk, for assessing the impact of non-native species such as black rats, and for understanding common species, including native squirrels, shrews, moles, and small weasels that can experience negative population changes despite their seeming abundance. Data would be especially valuable for rare species, such as porcupine, Pacific jumping mouse, and red fox, and for the many special-status bats.

Large mammalian carnivores other than coyote are seldom encountered in the park or its surrounds, due in part to the broad habitat requirements and nocturnal habits of these species. The relative isolation from the broader Coast Range makes some species rare in the park. When large carnivores are observed, they are often reported to PP&R staff. A lack of such reports on gray foxes in recent decades stands out and suggests that gray foxes are now extirpated from the park and the surrounding landscape. Similarly, the red fox now seems to be a rare, transient visitor to the park and no longer a resident. Data are nevertheless lacking. A regional study that includes Forest Park is necessary to understand fox abundance and habitat use in the park.

Burrowing rodents, especially pocket gophers and ground squirrels, are not known to occur in the park, and surveys are needed in the few areas where they may occur. Because their presence can be relatively easily detected in the isolated grasslands where they may occur, surveys would be valuable and economical. The Camas pocket gopher is a special-status species.

Elk sightings in Forest Park are reported annually to PP&R management by park visitors and neighbors, indicating strong

public interest in maintaining this species as a non-game animal in the park preserve. Systematic monitoring of this species' use of the park is needed, as is information on their abundance, seasonality, and use of broad trail-less areas in the North Management Unit. Elk are a species that could be lost from the park unless their movements, habitat use, and relative abundance are understood, and management efforts taken to maintain their presence.

Woodrats and voles are important ecological components in Pacific Northwest forests, though they are relatively small and nocturnal and often overlooked by park visitors. Native woodrats and voles (Cricetidae family) are not closely related to the non-native, Old World rats and mice (Muridae family) that occupy the disturbed park perimeter. Woodrats and voles have intriguing life histories and are important food resources for spotted owls and many other predators; members of both groups construct elaborate nests that become nesting and roosting structures for other wildlife.<sup>21,114</sup> The feasibility of reintroducing the red tree vole and the dusky-footed and bushy-tailed woodrats into the park should be explored.

Rare, but recently detected, species need further research to determine whether they are on the verge of being lost from the park. The North American porcupine, the Pacific water shrew, and Pacific jumping mouse have rarely been seen or captured in Forest Park and their presence, abundance, and distribution in the park are in question. Trapping and or motion-detection camera surveys that target these species in their preferred habitats are recommended to explore their relative abundance in the park.

## Birds

We have excellent information about avian population trends at the southern boundary of the park, and that citizen science effort is ongoing. The recently implemented and ongoing avian monitoring by Portland's BES has yet to produce population trend data at some riparian sites, but may begin to do so in the next few years.<sup>15,20</sup> While population trends for some bird species are well understood, in other cases the results are contradictory.<sup>28,30,33</sup> Because so many bird species appear to be in decline, monitoring of bird population trends at the north end of the park is recommended to understand whether trends at the southern tip may be related to urban effects that may be less impactful in the north.

Despite having the robust data on bird *diversity* in the park, the *population dynamics* of several common, special-status breeding bird species is in need of study. Even common species can experience population sinks in Portland parks,<sup>31</sup> and we know very little



*American robin nesting*  
(Photo: Scott Carpenter)



about how many common species are faring in terms of their reproduction. The list of species of interest includes the band-tailed pigeon, purple finch, pileated woodpecker, brown creeper, black-throated gray warbler, and bushtit. These projects are candidates for researcher-led citizen science efforts.

Uncommon bird species are even more susceptible to being lost from the park over time due to the affects of a population sink, and many uncommon birds are also special-status species. It is recommended that the population dynamics of varied thrush, Hutton's vireo, western wood peewee, and, especially, the olive-sided flycatcher be studied.

The loss of three species of landfowl in Forest Park greatly diminished the wildlife experience for park visitors. The reasons for these losses are unknown. It is recommended that an investigation be made into the regional range limits for sooty grouse, ruffed grouse, and mountain quail, and into the feasibility of reintroduction based on the current literature and expert opinion. Ultimately, the goal should be the reintroduction of these birds into the park if possible.

Nearly three dozen species show evidence of decline at the southern boundary of the park,<sup>33</sup> but the sources of these declines are poorly understood. Many of these birds are among the most common and abundant species in the park and nearly all of them are native species. For some species, a thorough review of the ornithological literature may elucidate the cause of their decline. In addition, local research may be necessary to best understand these declines, and potentially mitigate the threat of losing additional species from the park.

### **Reptiles**

Few reptile species use the park, and none are special-status species. The priority gaps for reptiles are to determine the presence or absence of the rubber boa snake and the northern and southern alligator lizards using straightforward survey methods. The search for rubber boa in the park is a candidate for a citizen science project.

### **Amphibians**

Data on amphibian diversity are robust because fewer than 10 species are likely to occur in the park, and because many in-stream, riparian, and upland surveys have been conducted. The presence of northwestern salamanders stands out as a credible question, and its occurrence should be investigated.

Other more complex questions about amphibian breeding still need answers, especially for the northern red-legged frog, a special-status species. Breeding sites for this species are ponds that lie outside of Forest Park on private, unprotected lands. Providing protection, access or substitutes for these breeding sites is likely to be a key to maintaining the red-legged frog population in the park. Methods for mitigating the potential loss of red-legged frogs should be explored.

## Mollusks

We have excellent information about the diversity of mollusks at the southern boundary of the park. Researcher-led citizen science surveys in the North and/or Central management units would be beneficial for understanding whether that diversity is well distributed and whether any non-native species have recently invaded. The increased abundance and impacts of the European red slug stand out as another research question.

## Arthropods

The number of arthropod species in the park, especially insect species, remains an important question, despite the great strides that have recently been made toward documenting invertebrate diversity. Knowledge of regional and statewide diversity and the ease with which species continue to be added to the park inventory suggest that many additional species are present and unaccounted. One of Oregon's leading entomologists, Jim LaBonte, estimates that as many as 10,000 species of terrestrial invertebrates inhabit the Portland metro area.<sup>28</sup> With over 5,000 species of beetle and moth in Oregon, it seems likely that thousands of additional species may be present in the park. Insect families other than beetles and moths have been mostly ignored, except during the BioBlitz for Forest Park Wildlife, so thousands of these species have likely been missed. Surveys by the ODA and the USDA have focused on collecting and identifying wood-boring beetles and moths because of their potentially devastating impacts to agricultural and forest resources. Many invertebrate experts are eager to explore regional diversity, but the process of creating a mostly complete inventory of invertebrate species for the park is a large, long-term one. An effective strategy must involve many partners, including ODA, USDA, and regional universities. The creation of a voucher collection in association with PSU has been proposed.

Beyond basic questions of diversity, myriad questions surround arthropod ecology in the park. Data for the park are almost completely lacking on invertebrate ecology, despite the hundreds



*Red net-winged beetle*

of beetle and moth species and dozens of spiders, bees, wasps, and ants known to occur there. The lack of data has led to a lack of exposition on these taxa in this report, but does not diminish their ecological impact or the need for additional research. The need for further research is highlighted by the fact that, unlike vertebrate wildlife, a relatively high percentage of the park's insects are non-native, and several non-native species are serious threats to forest health. We have a poor understanding of the extent of non-native insect diversity and impacts, and these should be researched in greater depth.

### Wildlife Response

Although extensive efforts have been made to remove invasive vegetation and restore habitat, the response of wildlife to these actions has not been measured. We should test the “build it and they will come” management strategy by measuring diversity and abundance in pre- and post-treatment experiments.

Similarly, we need quantitative data on whether habitat alteration within the park is negatively impacting special-status species. Shrub habitat in the park is limited, but is sometimes extensively cut during utility corridor maintenance activities. Including shrub habitat sites in wildlife monitoring efforts may be enough to elucidate these impacts.

Dogs are often postulated as the source of negative wildlife impacts. Dog walking is the third most popular activity in the park, after hiking and running.<sup>115</sup> Observance of leash requirements has increased markedly in recent years.<sup>102</sup> But the impact of dogs on wildlife remains poorly understood and should be studied in the park.

Many wildlife species are *area-sensitive* and require relatively large habitat patches for breeding, foraging, and resting.<sup>116</sup> Occupancy of forest fragments by songbirds in particular is primarily influenced by forest patch size and habitat type.<sup>117</sup> Maintaining large forest patches is necessary for maintaining high levels of avian diversity and the presence of elk and some other mammals. In one local study, trail density was indirectly related to the population growth rate of spotted towhees, meaning that as the number of trails increased, the rate of population growth decreased, apparently due to the negative effects of trail density on adult survival.<sup>31</sup>

In one study, half of all park visitors felt that passive recreation had no negative effect on wildlife, despite evidence that the probability that an on-trail pedestrian would flush an animal, such as a native

mule deer, was 70% when approaching within 100m. Recreational users also tend to blame other types of park users for impacts to wildlife, rather than their own group.<sup>118</sup> The extent to which park users influence wildlife depends on the wildlife taxa under consideration, but the response of most species to pedestrian and domestic animal disturbance is poorly understood. In one study, pedestrian activity was correlated with a negative impact on avian species' foraging and occupancy of forest fragments.<sup>119</sup> Others have suggested that an inverse relationship exists between a species' body size and its negative response to park users, such that smaller wildlife species must be approached more closely than larger ones before they respond negatively. Furthermore, larger *groups* of animals tend to flush at longer distances than individuals of the same species, so human activity may contribute to the rarity of ungulate herds in the park.<sup>118</sup> Large and predatory mammalian wildlife species are prone to avoid human interactions, thus any human presence in their habitat is impactful. However, many mammalian species are nocturnal, and thus naturally avoid most park visitors that use the park legally (5 AM–10 PM). In contrast with mammals and some birds, the distribution and abundance of amphibians, reptiles, mollusks, and arthropods is not believed to be strongly influenced by park users.

The response by wildlife to illegal park activities is also poorly understood. Numerous encampments, the construction of rogue trails, and instances of nocturnal cycling have been postulated as negative impacts on wildlife, particularly large terrestrial mammals, but no quantitative data exist to support these notions.

## Wildlife Habitat Assessment

A wildlife habitat assessment needs to be completed for Forest Park. Snags, coarse woody debris, shrubs, ground cover, and soil are key wildlife habitat components in the park, and relatively little quantitative data exist about these. PP&R's vegetation surveys were focused on understanding plant diversity and composition, but not wildlife habitat.<sup>11</sup> The data on wildlife habitat that are available are often localized to just a few sites or short stream reaches. For wildlife of concern, such as bats, voles, northern red-legged frogs, woodpeckers, flycatchers, and beetles, an assessment of specific wildlife habitat components may be necessary to understand whether the park currently offers adequate habitat, and whether the existing habitat could be altered to attract and maintain populations of interest.



*Low shrubs and groundcover create a habitat for wildlife in Forest Park*

Additionally, some wide-ranging species use habitat beyond the park boundary, and then return to the park for breeding or foraging in other seasons, or at other times of day. An understanding of the use of non-park habitat by park wildlife has been identified as an important gap, especially for special-status species and others of interest including elk, northern red-legged frogs, band-tailed pigeons, Vaux's swifts, and grouse.

### **Special Status Habitats**

Oak stands and forested wetlands are TEES Special Status Habitats and need to be surveyed systematically in the appropriate seasons, especially late winter and spring. These habitats may attract wildlife species that occur nowhere else in the park. Oak stands may harbor southern alligator lizards, white-breasted nuthatches, western gray squirrels, and some special-status woodpecker species. Forested wetlands may provide unknown breeding habitat for northern red-legged frogs.

### **Wildlife Recolonization and Reintroduction**

The recognition of the inability of some Coast Range species to recolonize the park makes obvious that we lack information on the feasibility of reintroduction of species. Reintroductions of small native mammals and landfowl species, such as the red tree vole and the dusky-footed woodrat, are opportunities to improve park ecology by restoring historical diversity while expanding the habitat of species of concern, and improving the wildlife experience for park visitors. Although Forest Park has transitioned to a mature second-growth forest with some late-successional conifer stands, species such as these appear unable to recolonize the park from the Coast Range or the Tualatin Valley due to extensive regional habitat disturbance and the relative isolation of the park for some species.

In addition, reintroduction of native sculpin and freshwater mussels could improve the ecology and water quality of some park streams. In remnant oak stands, restoration projects that include the use of artificial nest boxes could encourage recolonization by white-breasted nuthatch, western bluebird, and Lewis's woodpecker to the park.

# Glossary

<i>abundance</i>	(n.) The number of individuals of a given species or other taxonomic group.
<i>arboreal</i>	(adj.) Tree-dwelling.
<i>aposematic coloration</i>	(adj.) Typically bright coloration that acts as a warning to predators that an animal has defenses and eating it would be unprofitable. It may be an honest or dishonest signal.
<i>circadian</i>	(adj.) Characterized by a 24-hour pattern of activity.
<i>circannual</i>	(adj.) Characterized by a yearly pattern of activity.
<i>coarse woody debris</i>	(n.) Large trees or branches that are dead and on the ground or in a stream; a valuable habitat component for wildlife.
<i>congeneric</i>	(adj.) belonging to the same genus. (n.) congener.
<i>conifer-dominated forest</i>	A forest area with greater than 50% conifer cover (see Fig. 3).
<i>diameter at breast height (dbh)</i>	(n.) The diameter of a standing tree at 4.5 feet above the ground on the uphill side of the tree.
<i>deciduous forest</i>	A forest area with less than 25% conifer cover (see Fig. 3).
<i>ecotone</i>	(n.) The transition area between two distinct habitats.
<i>forest</i>	(n.) A broad area with a high density of trees, and few or no open spaces. A broader, more densely treed area than a woodland.
<i>forest edge</i>	<see <i>Edge Habitats</i> in the <i>Report Framework</i> section>.
<i>fossorial</i>	(adj.) Living underground.



## Glossary

<i>gravid</i>	(adj.) Carrying fertilized eggs internally.
<i>home range</i>	(n.) The area where an animal lives, forages, and travels, often larger than the animal's territory.
<i>invasive species</i>	(n.) A species capable of rapidly expanding its range or abundance in an area, often as the result of recent colonization and an absence of strong competition.
<i>interior forest</i>	(n.) A forest patch of 30 acres in size or greater that is more than 300 feet from the nearest forest edge.
<i>invertebrate</i>	(n.) An animal, such as an insect, spider or slug, that lacks a spinal column.
<i>mixed conifer-deciduous forest</i>	A forest area with between 25 and 50 percent conifer cover (see Fig. 3).
<i>non-native species</i>	(n.) A species that did not occur historically in an area.
<i>perennial stream</i>	(n.) A stream with continuous flow throughout the year except in dry years.
<i>relative abundance</i>	(n.) The number of individuals in a given taxonomic group stated in relationship to another taxonomic group, often as a percentage.
<i>riparian</i>	(adj.) Of or relating to the area surrounding a stream or other water body.
<i>roost</i>	(v.) To sit, rest or sleep.  (n.) A location used, often repeatedly, for resting, sometimes by large numbers of individuals of the same species ("communal roost").
<i>snag</i>	(n.) A standing dead tree, at least 4 inches dbh and 6 feet tall, often valuable for wildlife for nesting, roosting and feeding.

*territory*

(n.) The area that an animal defends, especially from individuals of the same species and sex, and most often during its breeding season. Animals that do so are considered "territorial." An animal's territory is often smaller than its home range.

*wildlife corridor*

(n.) An area of habitat connecting wildlife populations separated by human activities, such as roads, development, or logging. A wildlife corridor allows an exchange of individuals between populations, which may help prevent the negative effects reduced genetic diversity that often occur within isolated populations.

*woodland*

(n.) An area covered by trees with many open spaces; an area with 40% or less tree canopy cover.



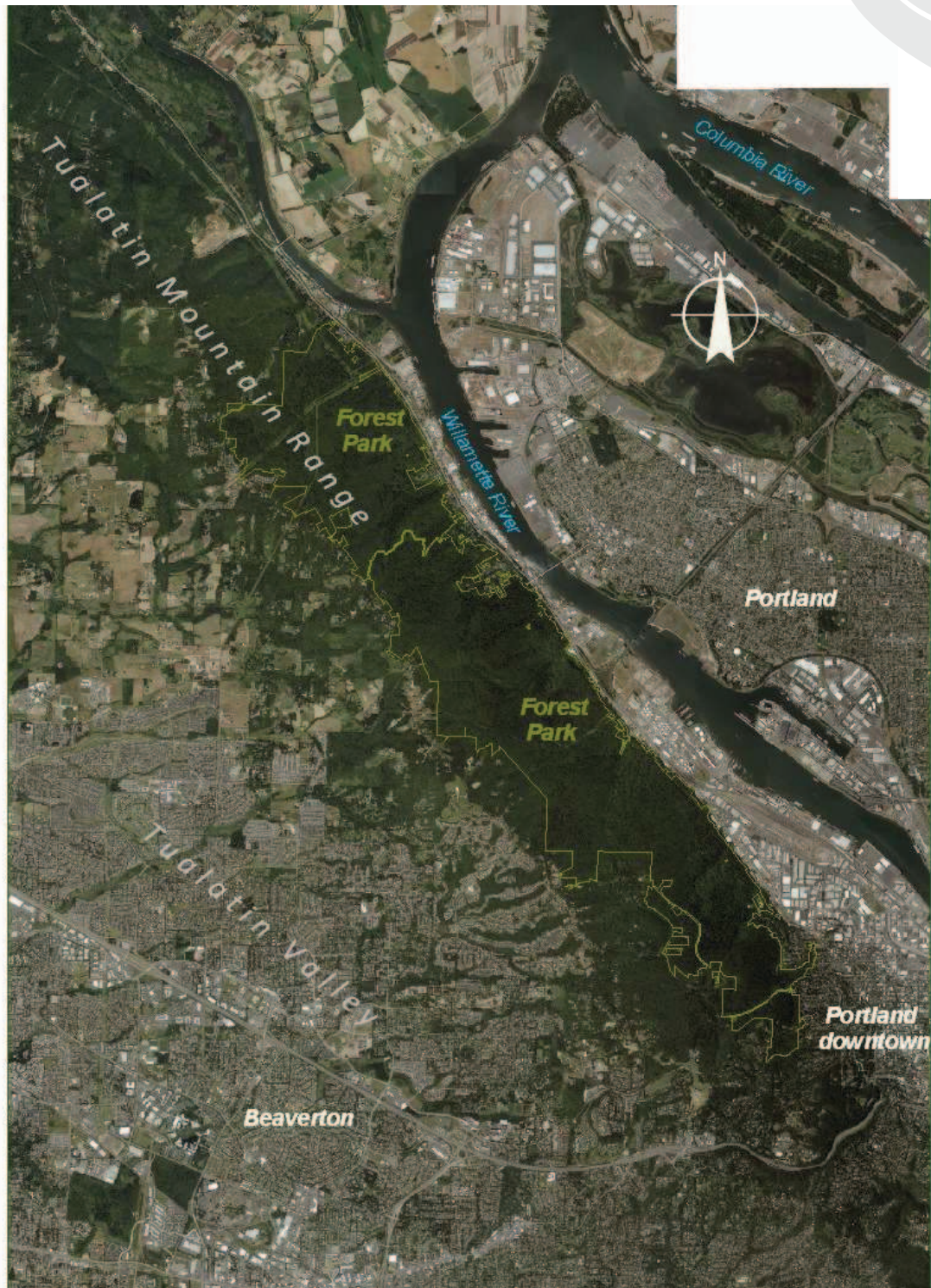
*Pacific wren*  
(Photo: Scott Carpenter)





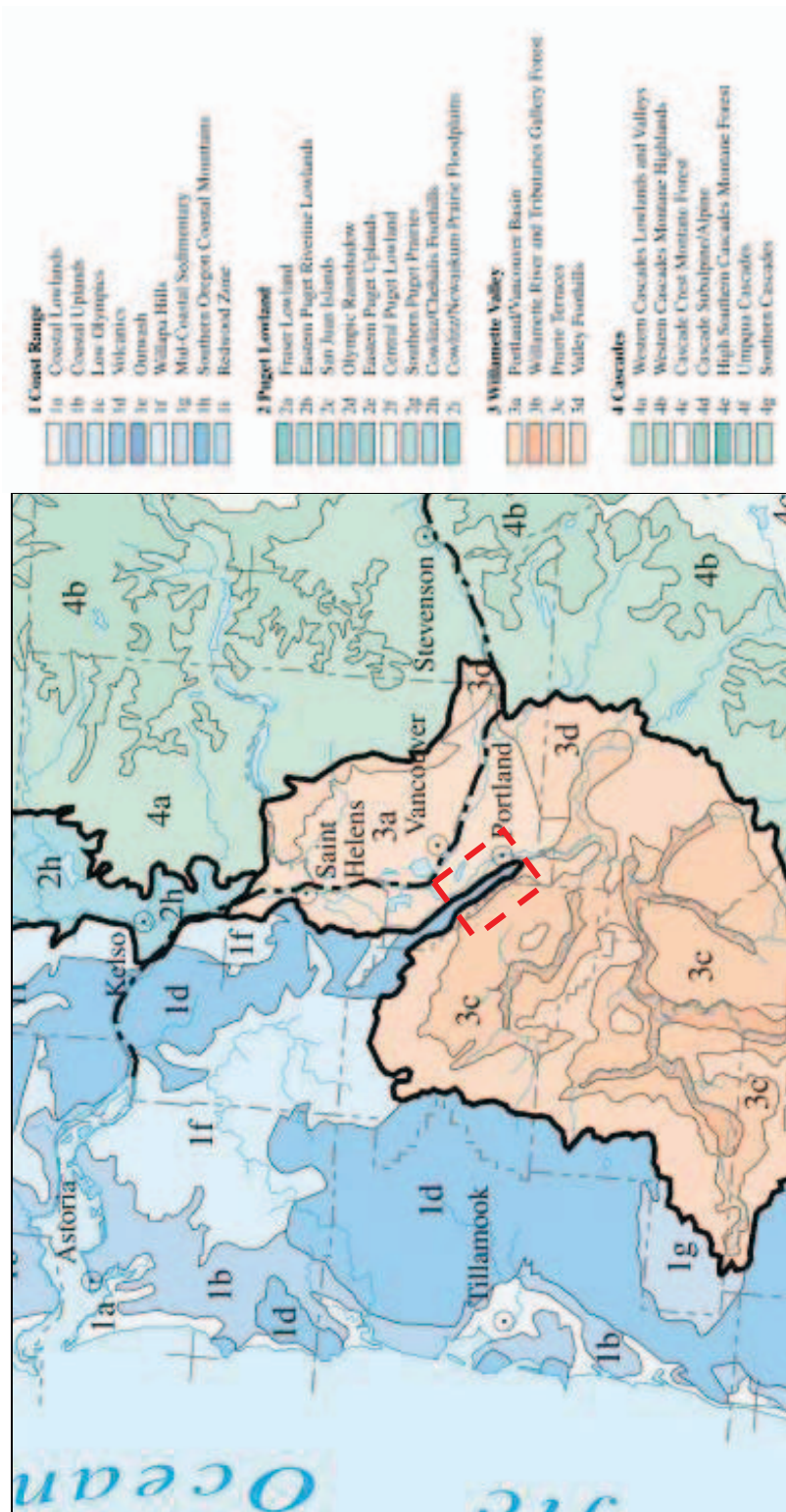
*Bobcat tracks*

## Appendix A: Figures

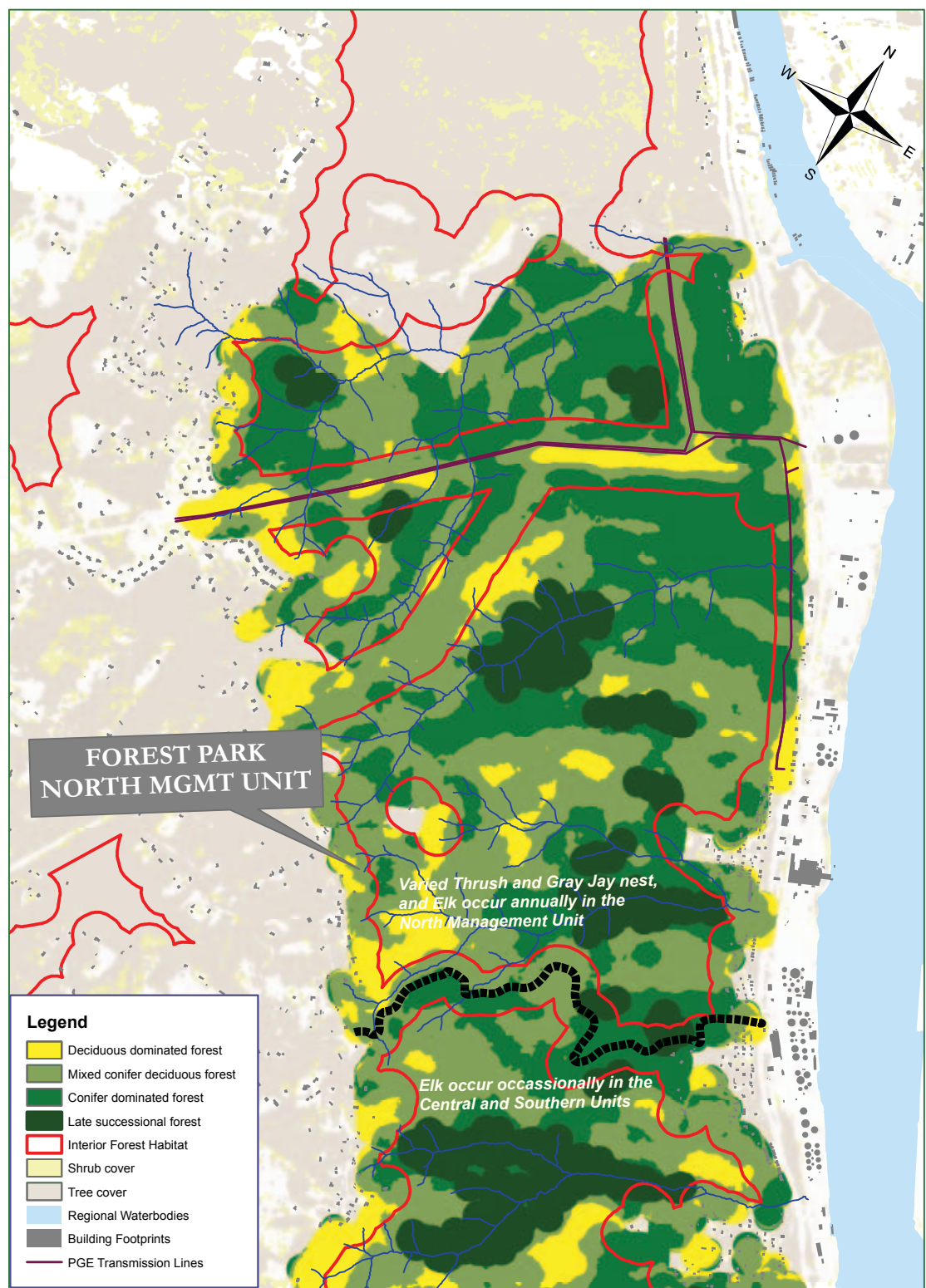


**Figure 1.** Aerial view of Forest Park and the surrounding landscape, 2010 (scale: 1:68,000).



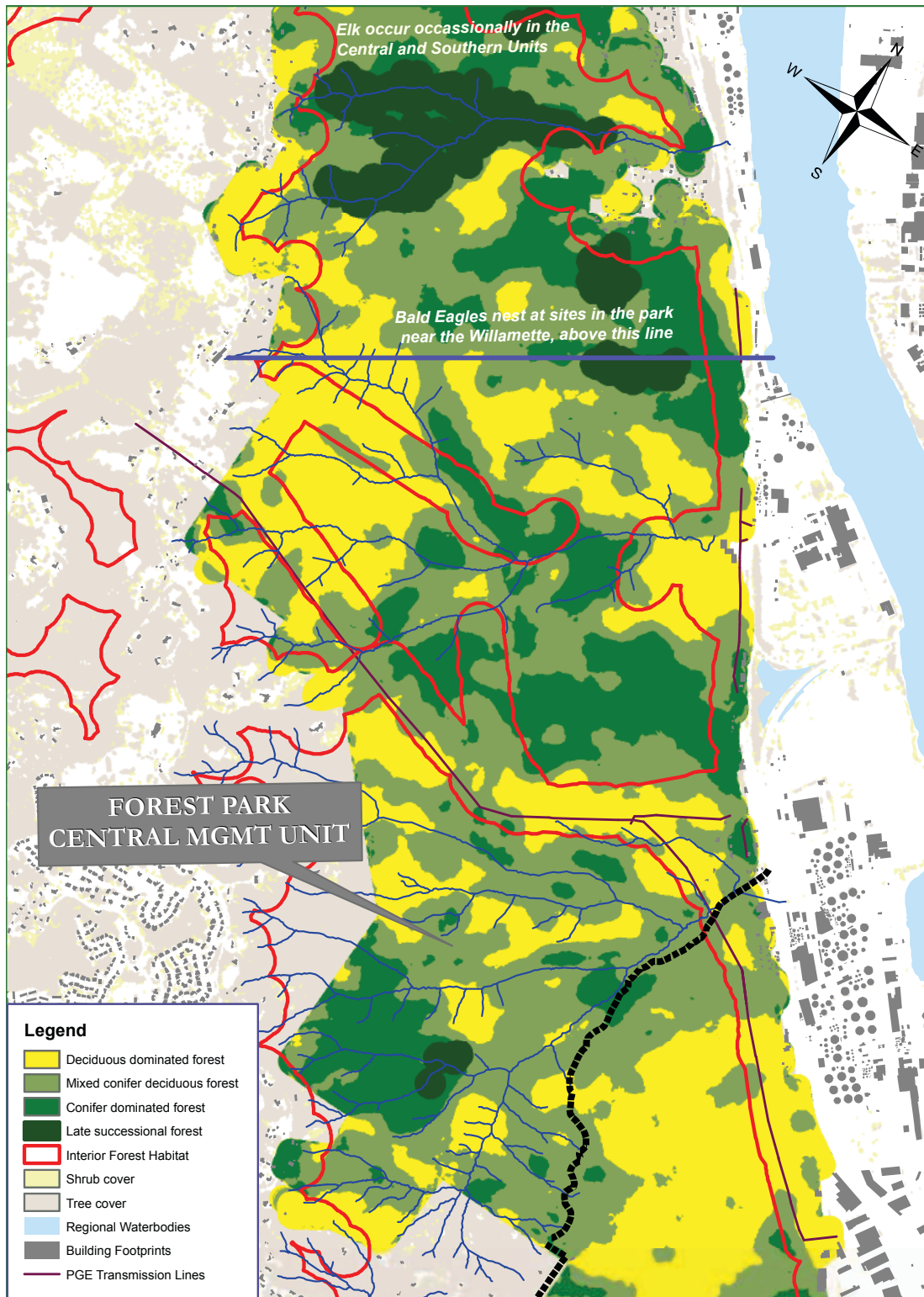


**Figure 2.** Ecoregions surrounding the Portland metropolitan area showing Forest Park (in red dashed rectangle) as a narrow, peninsular extension of the Coast Range ecoregion.<sup>121</sup>

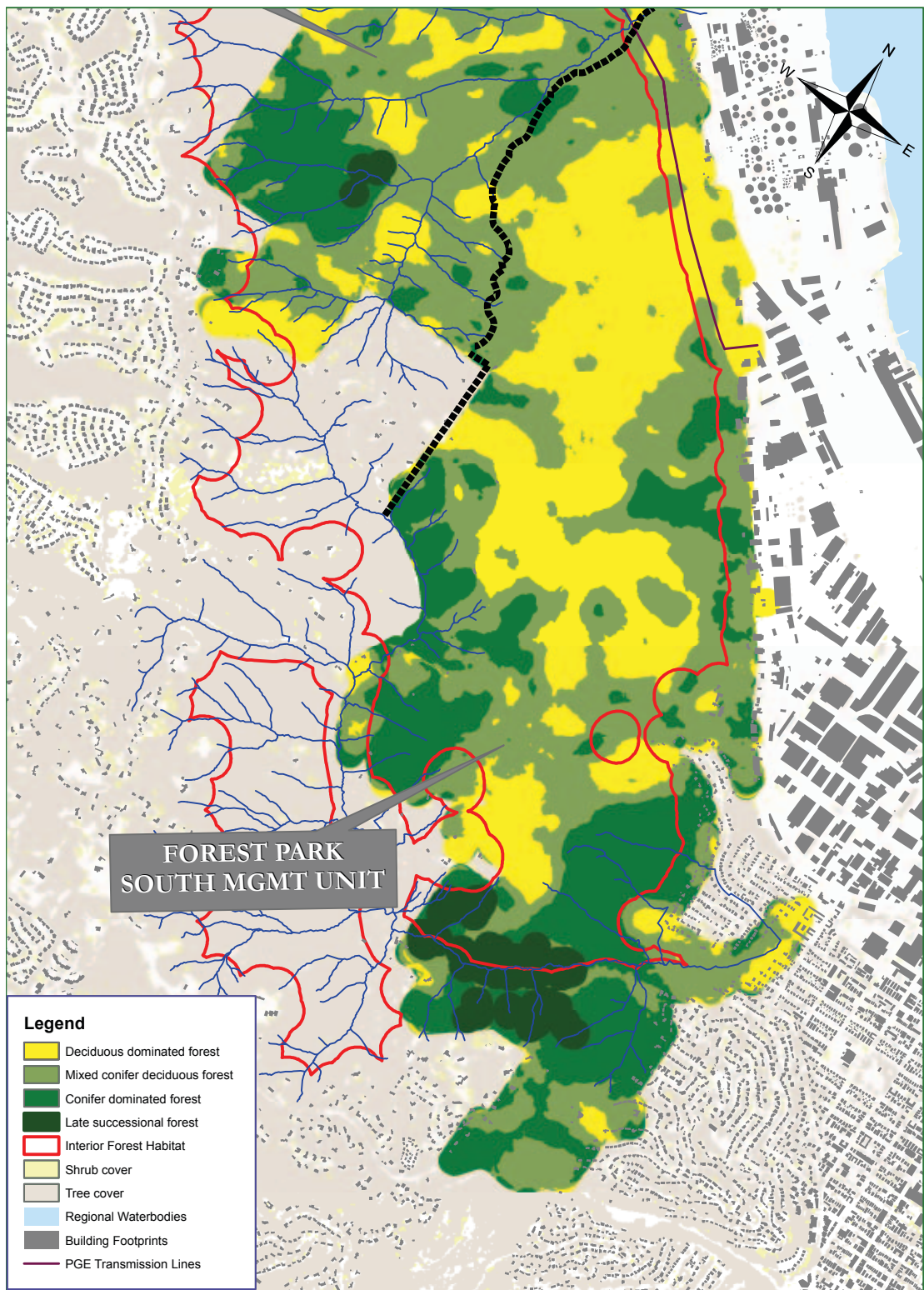


**Figure 3. (A)** Forest Park North Management Unit: wildlife and habitat distribution.



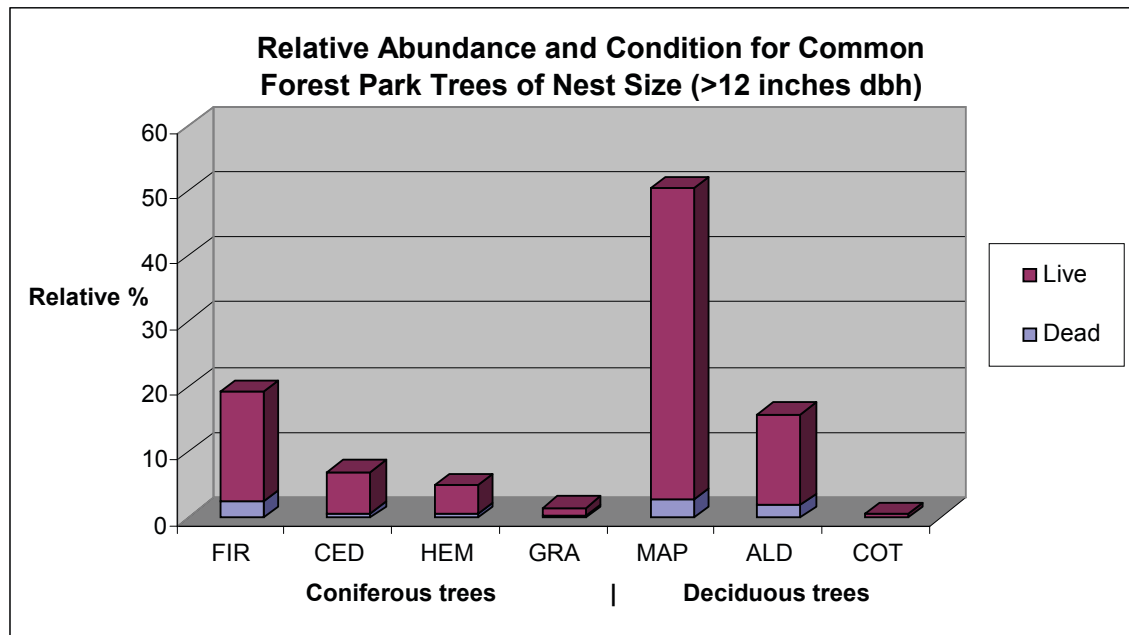


**Figure 3. (B)** Forest Park Central Management Unit: wildlife and habitat distribution.

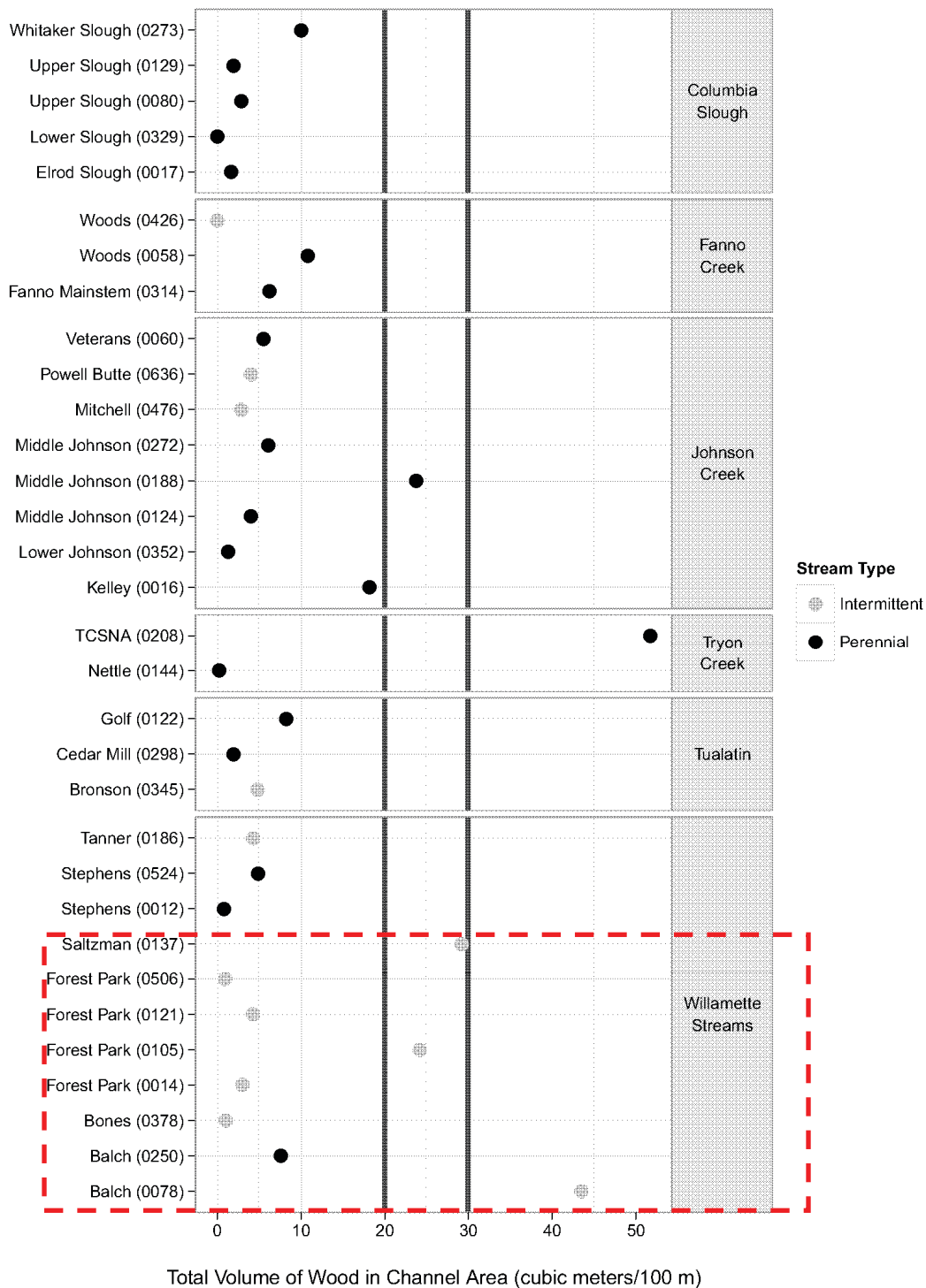


**Figure 3. (C)** Forest Park South Management Unit: wildlife and habitat distribution.

## Appendix A: Figures



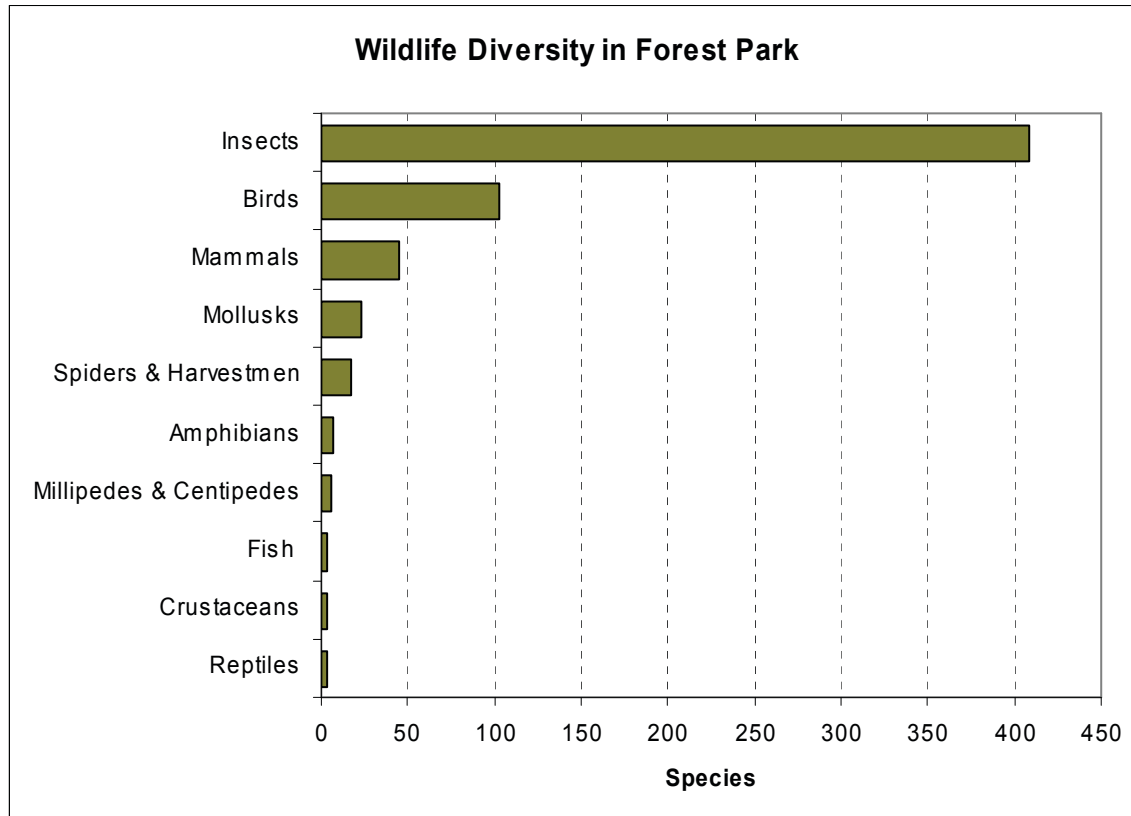
**Figure 4.** Percentage of relative abundance and condition for specimens of the seven most common trees species in Forest Park that achieve at least 12 inches in diameter at breast height.<sup>12</sup> Tree species are Douglas-fir (FIR), western red-cedar (CED), western hemlock (HEM), grand fir (GRA), big-leaf maple (MAP), red alder (ALD), and black cottonwood (COT) .



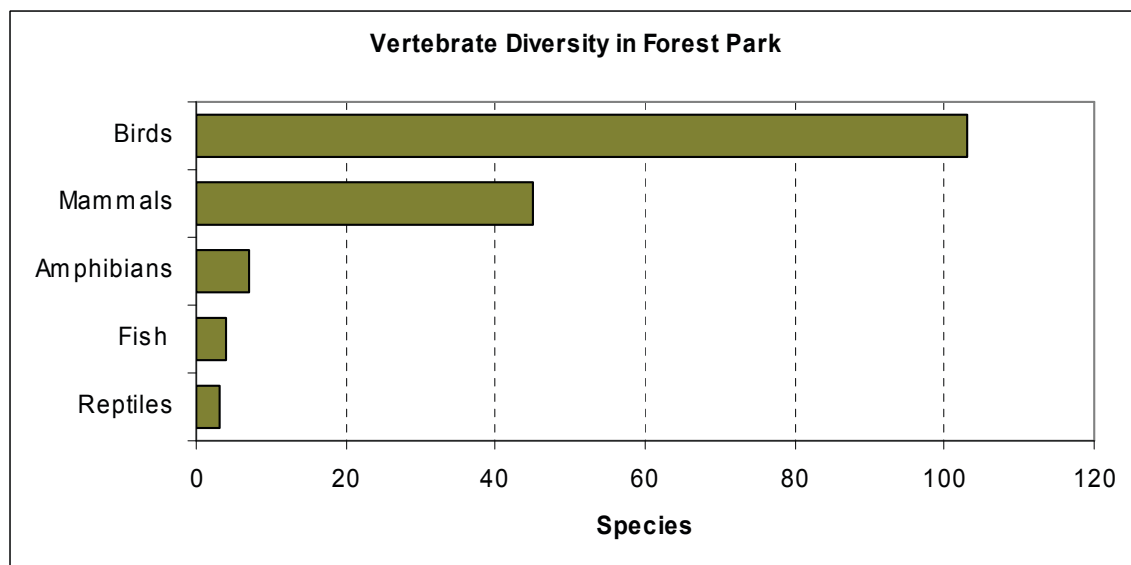
**Figure 5.** Volume of in-channel coarse woody debris in randomly selected Forest Park streams (“Saltzman,” “Forest Park” [unnamed, intermittent streams], and “Balch”) relative to Oregon Department of Fish and Wildlife’s undesirable (20 m<sup>3</sup>/100-m stream length) and desirable benchmarks (30 m<sup>3</sup>/100-m stream length) and other regional streams.<sup>20</sup>



## Appendix A: Figures

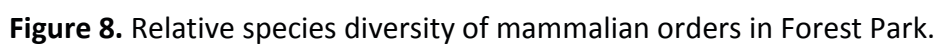
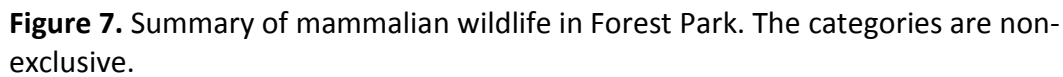


**A**

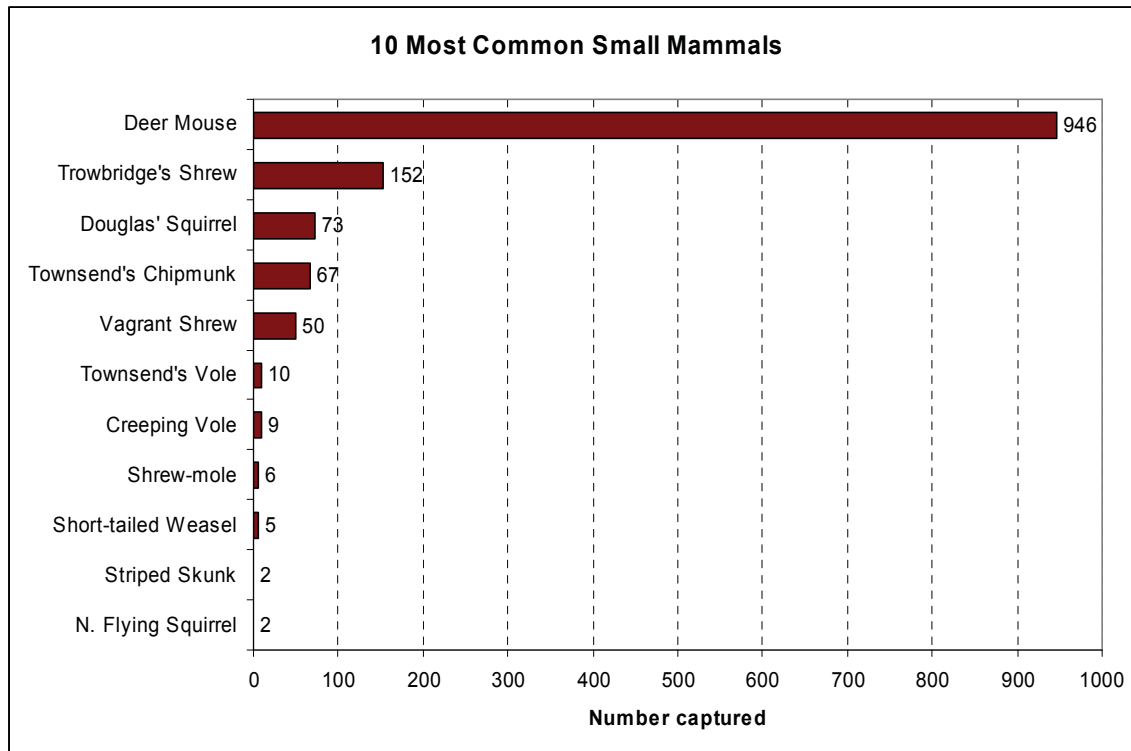


**B**

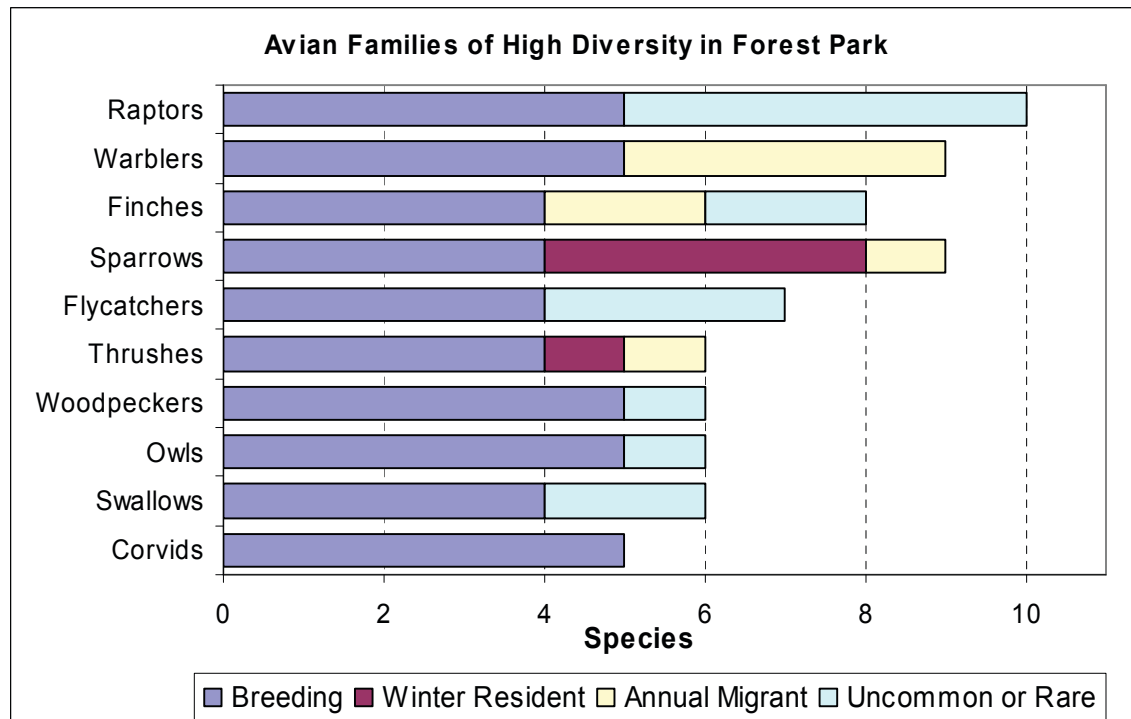
**Figure 6. (A)** Relative diversity of Forest Park wildlife. The known diversity of arthropod groups may be a substantial underestimate of their actual diversity. **(B)** Relative diversity of vertebrates.



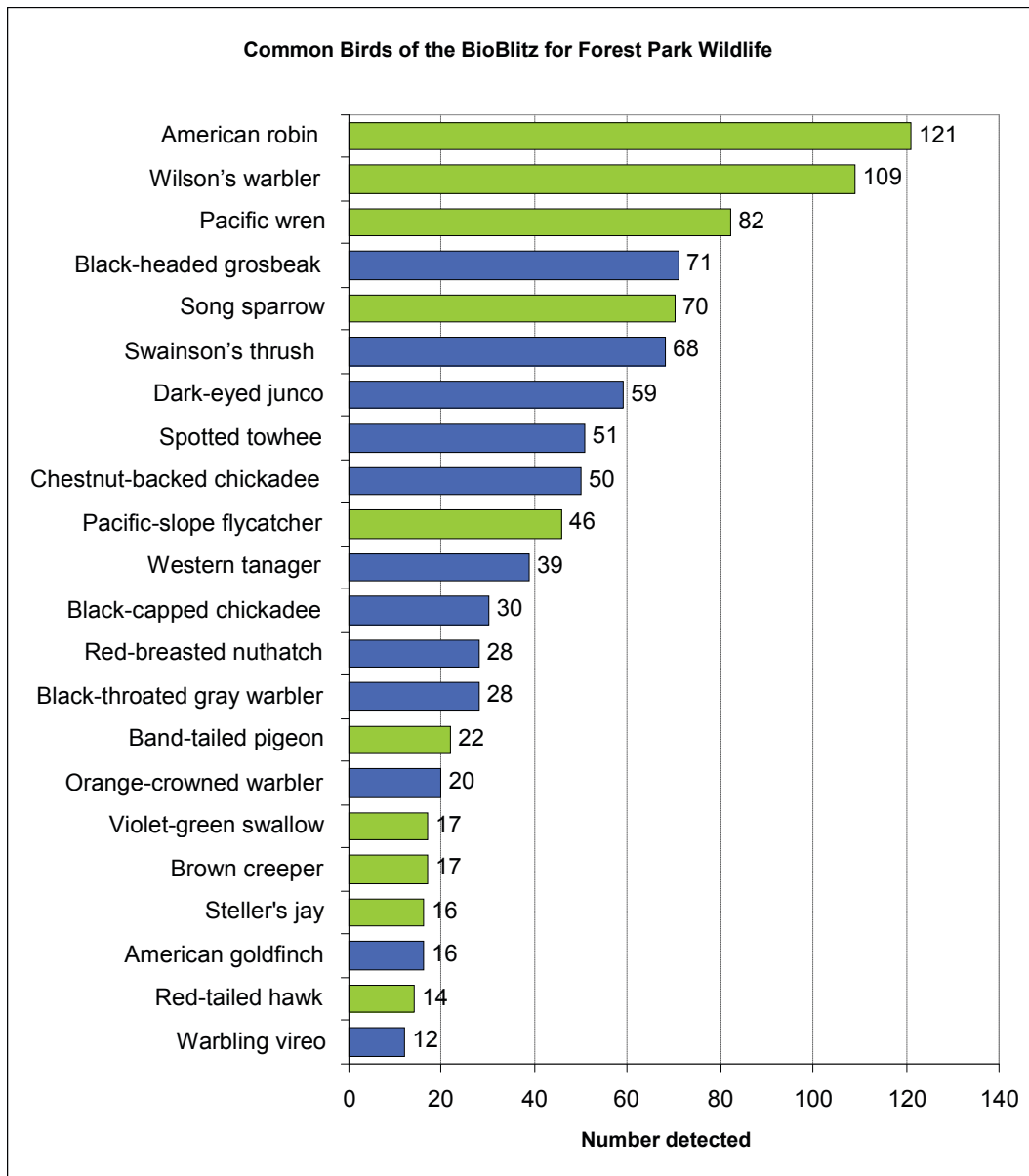
## Appendix A: Figures



**Figure 9.** Top 10 most common small mammal species captured in Forest Park. Northern flying squirrel and striped skunk tied for 10th place.<sup>10,56,57</sup>

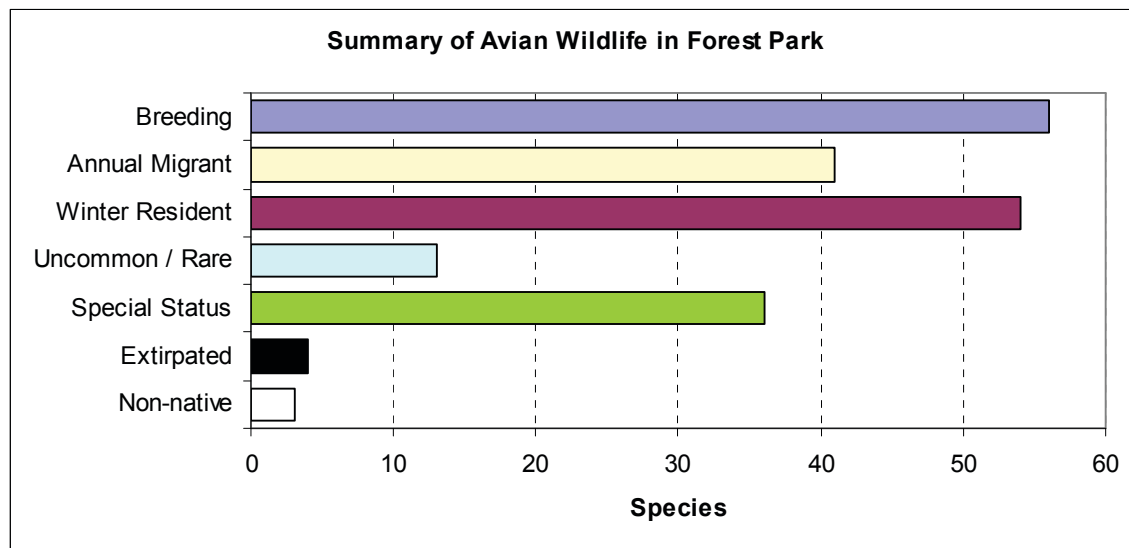


**Figure 10.** Relative diversity and seasonality among avian families of high diversity in Forest Park.

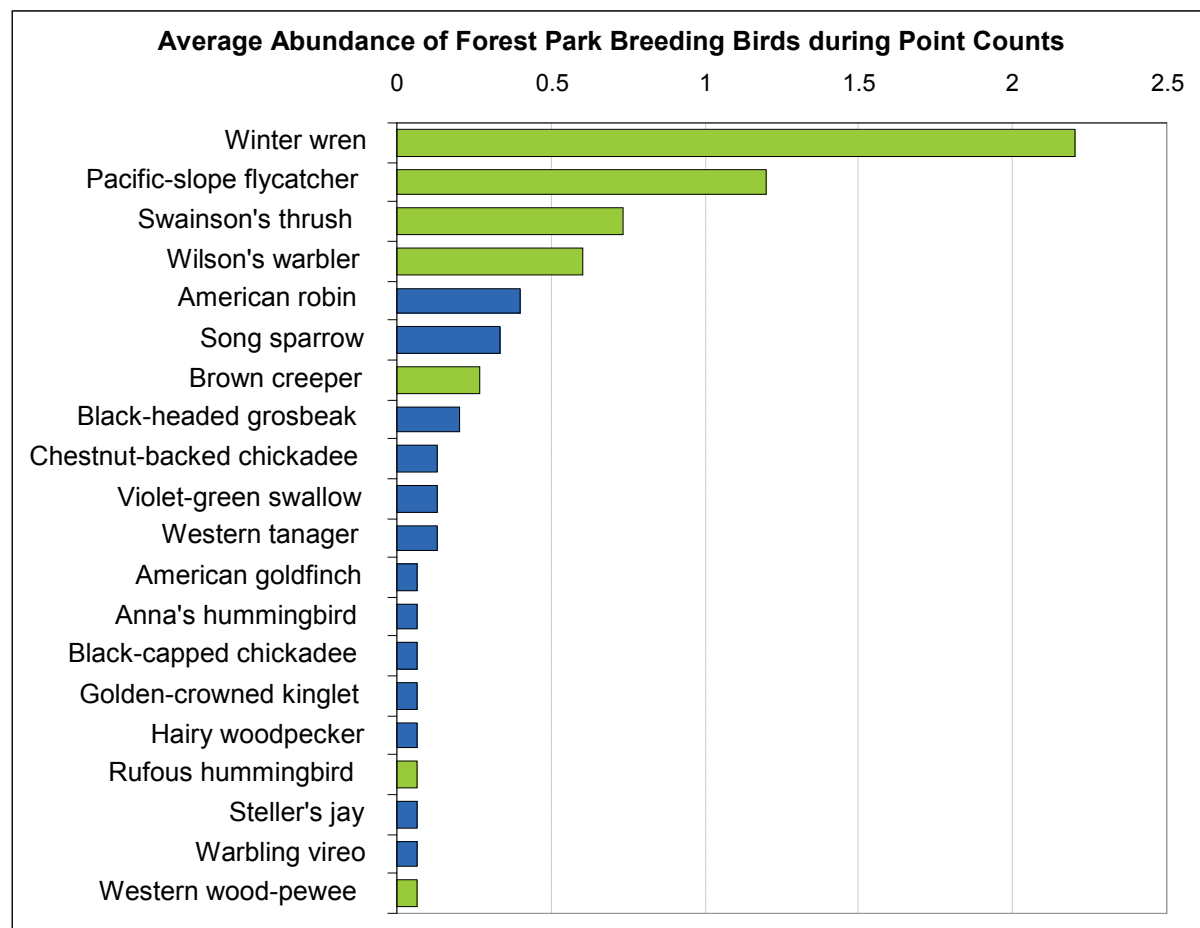


**Figure 11.** The top 35 most common birds of the BioBlitz for Forest Park Wildlife, May 2012.<sup>34</sup> TEES Special Status Species are shown in green. Pacific wren was formerly winter wren.

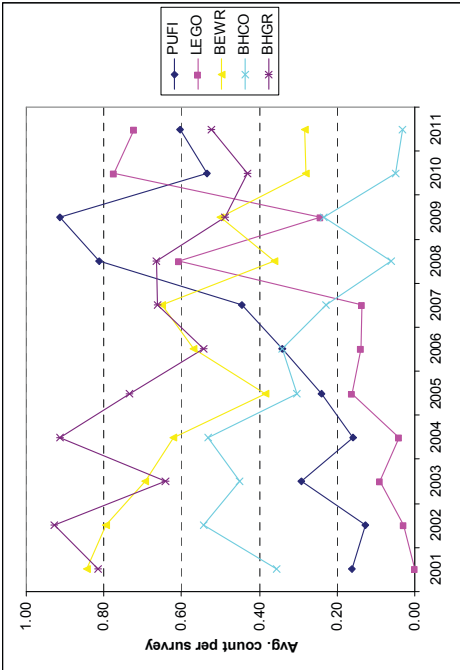
## Appendix A: Figures



**Figure 12.** A summary of avian wildlife indicating breeding diversity, seasonality, and status. Some species fall into multiple categories.

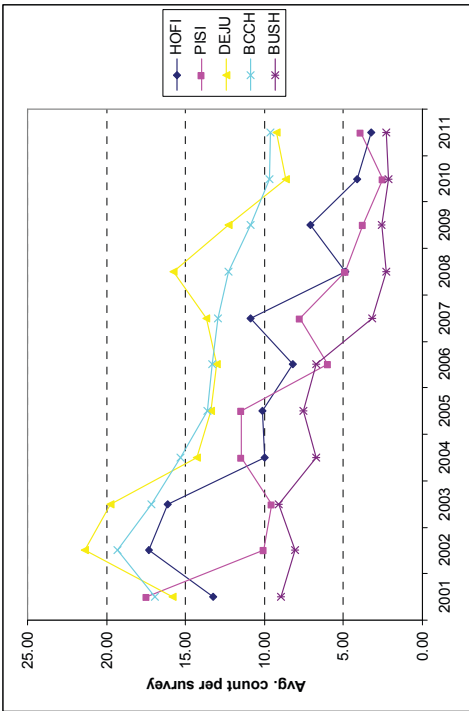


**Figure 13.** Average abundance of breeding birds detected during point count surveys at five sites in Forest Park in 2011.<sup>20</sup> TEES Special Status Species are shown in green.

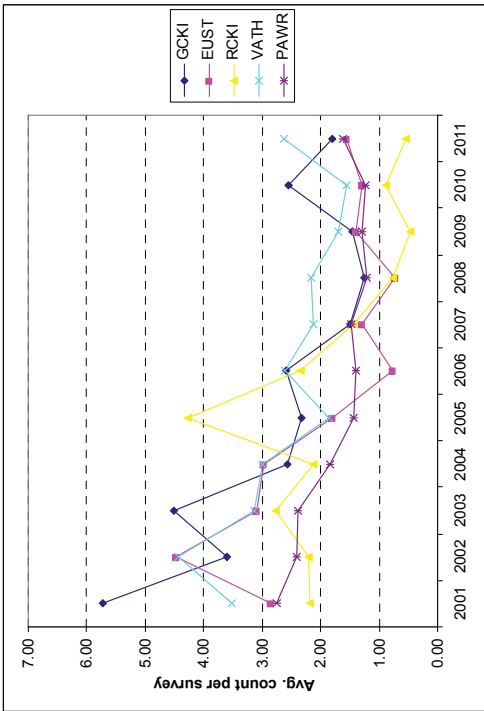


(C) Trends for five **fairly common** bird species that averaged 0.1 to 1 detection per survey most years. PUFI = purple finch, LEGO = lesser goldfinch, BEWR = Bewick's wren, BHCO = brown-headed cowbird, BHGR = black-headed grosbeak.

**Figure 14.** Trends in avian abundance near the southern boundary of Forest Park, 2001–2011.<sup>33</sup> The 59 species for which adequate data were collected were grouped by whether they were (A) abundant, (B) common, or (C) fairly common. The five species from each group that had the highest magnitude change in abundance (i.e., change in slope of fitted line) are ordered by their relative abundance in 2001.

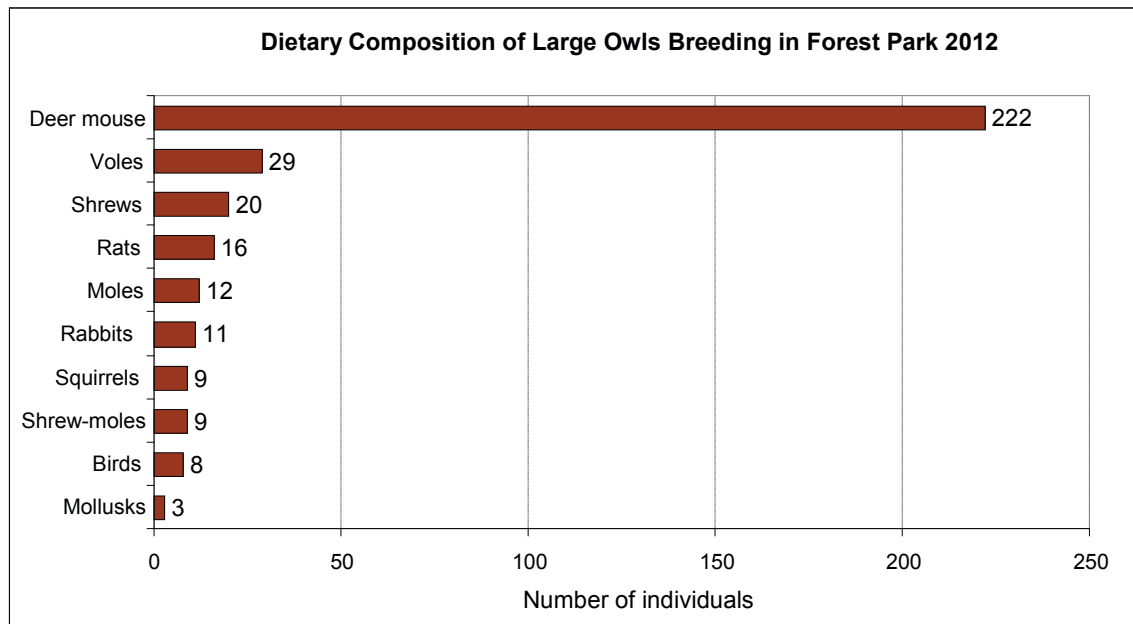


(A) Trends for five **abundant** bird species that averaged >5 detections per survey most years. HOFI = house finch, PISI = pine siskin, DEJU = dark-eyed junco, BCCH = black-capped chickadee, BUSH = bushtit.

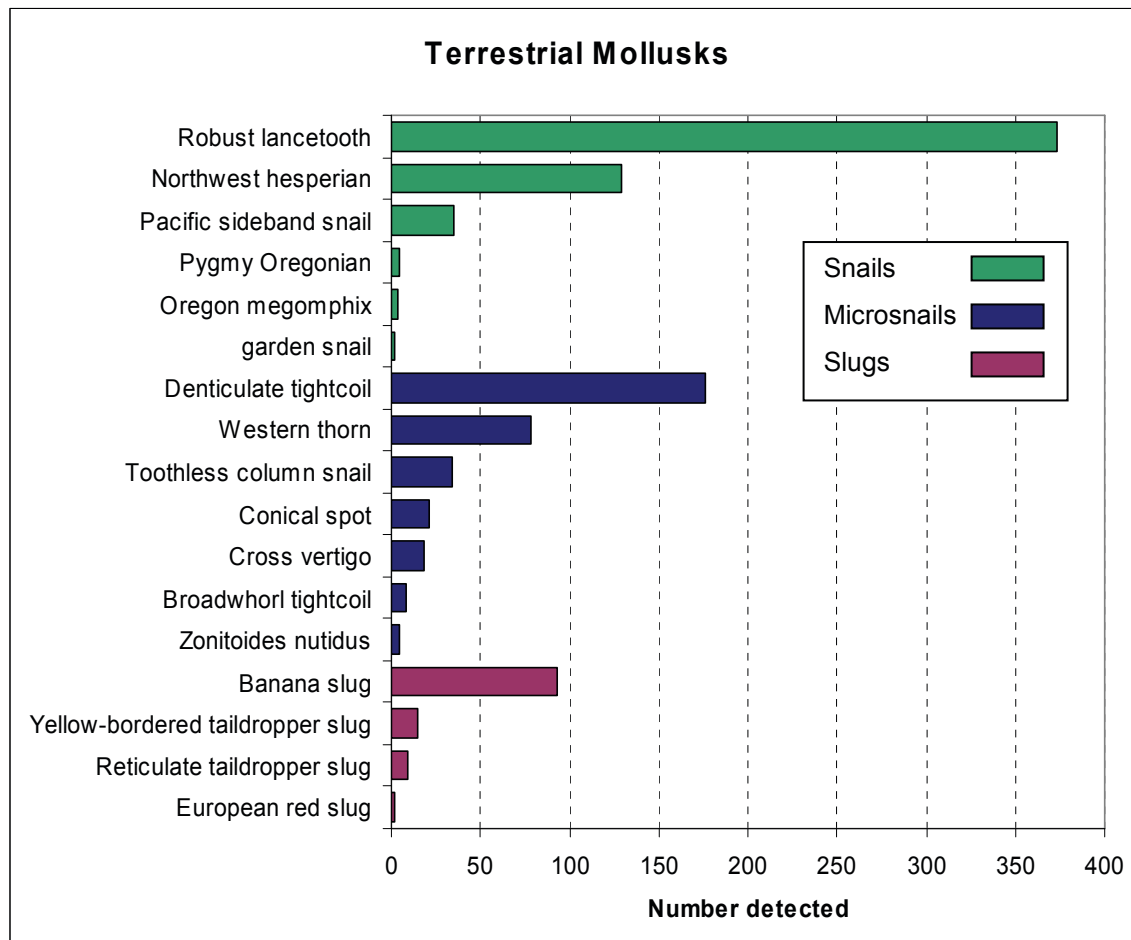


(B) Trends for five **common** bird species that averaged 1 to 5 detections per survey most years. GCKI = golden-crowned kinglet, EUST = European starling, RCKI = ruby-crowned kinglet, VATH = varied thrush, PAWR = Pacific wren.

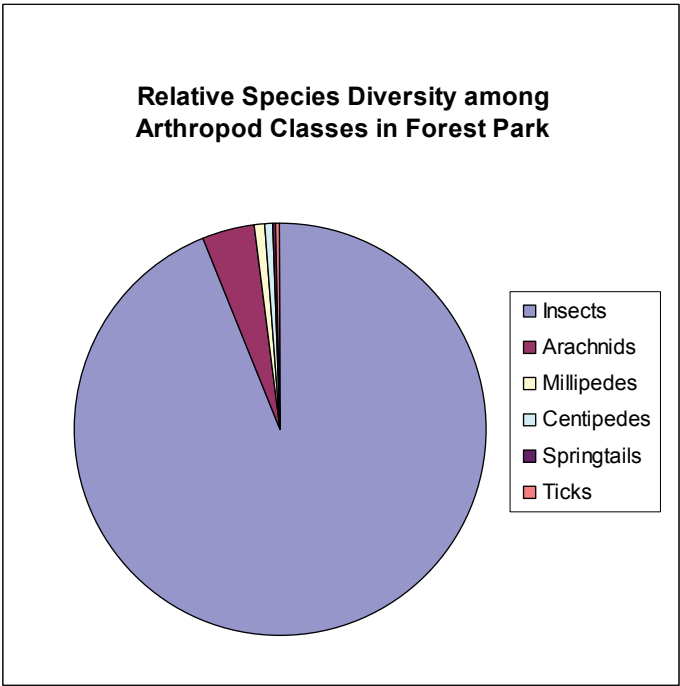
## Appendix A: Figures



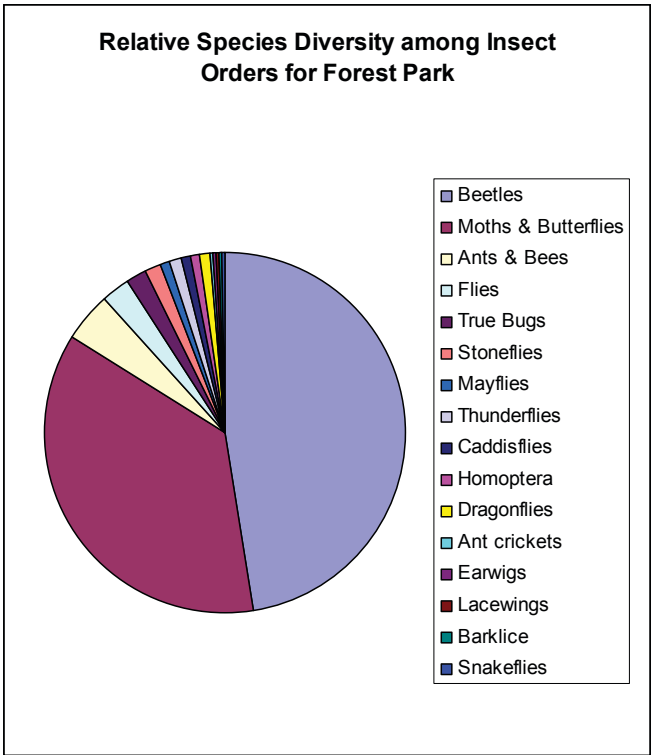
**Figure 15.** Composition of combined prey items of great horned owls and barred owls that bred in Forest Park in 2012.<sup>46</sup>



**Figure 16.** Terrestrial mollusk diversity and relative abundance at 26 plots ( $r = 5$  m) near the southern boundary of Forest Park.<sup>87</sup>



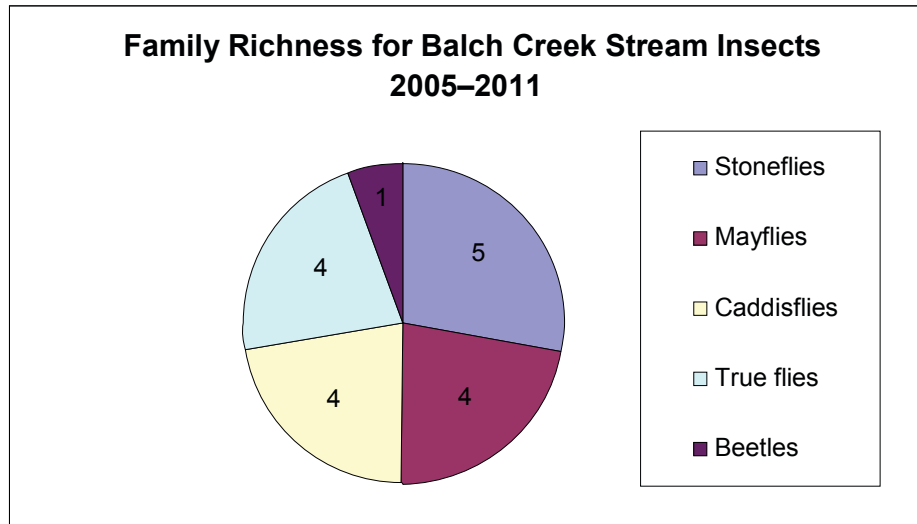
**Figure 17.** Relative species diversity among arthropod classes for Forest Park.<sup>25,34,88,89</sup>



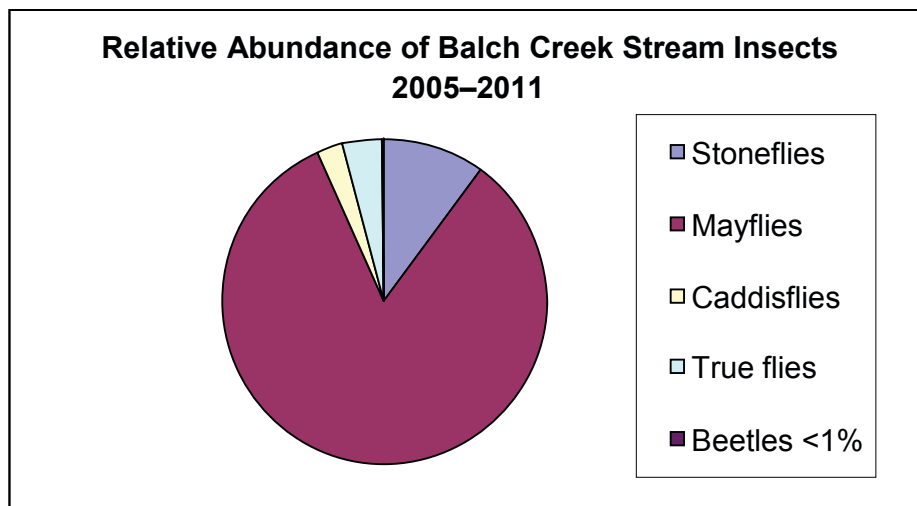
**Figure 18.** Relative species diversity among insect orders in Forest Park.<sup>25,34,88,89</sup>



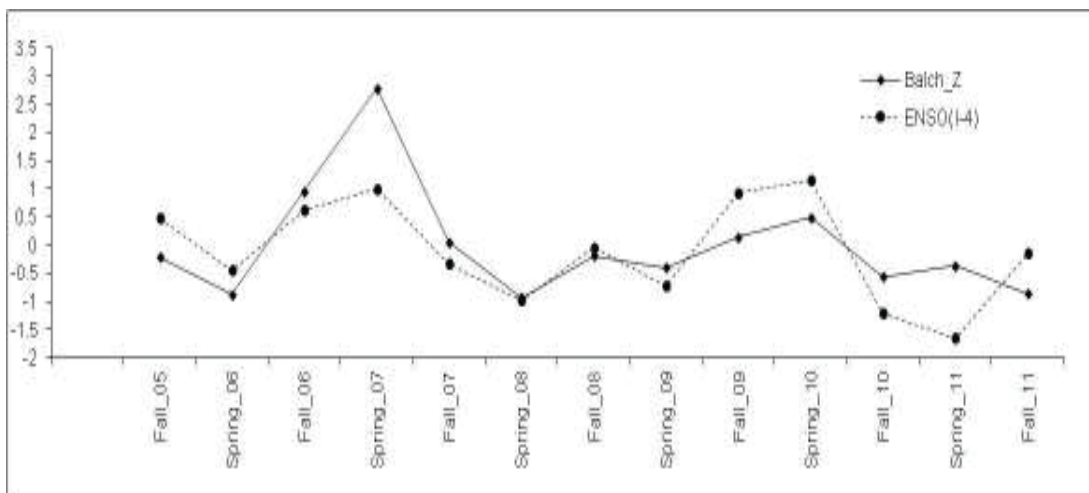
## Appendix A: Figures



**Figure 19.** Taxonomic family richness for Balch Creek stream insects, 2005–2011.<sup>25,89</sup>



**Figure 20.** Relative abundance of Balch Creek stream insects, 2005–2011.<sup>25</sup>



**Figure 21.** Relationship between abundance of Balch Creek stream insects (Balch\_Z) and the strength of El Niño/La Niña events (ENSO) 4 months prior to sample date.<sup>25</sup>

## Appendix B: Tables

**Table 1.** Forest Park vegetation summary and human impact information relevant to wildlife as derived from the Vegetation Unit Summaries for Forest Park.<sup>11</sup> The U.S. Geological Survey (USGS) National Vegetation Classification Standard (NVCS) protocol was used for these surveys.

Total Forest Park Natural Resource Units		324				
Total acres surveyed		5,011				
		Units	% Units	Acres	% Acres	Avg. % per unit
<b>NVCS class</b>	Forest	273	84	4,734	94	
	Shrubland	13	4	86	2	
	Woodland	17	5	86	2	
	Herbaceous	9	3	8	<1	
<b>NVCS subclass</b>	Mixed evergreen-deciduous forest	132	41	2,425	48	
	Deciduous forest	89	27	1,453	29	
	Evergreen forest	52	16	857	17	
	Deciduous woodland	11	3	47	1	
	Deciduous shrubland	15	5	15	<1	
	Perennial grasses	8	2	7	<1	
	Other	17	5	207	4	
<b>NVCS formation</b>	Giant temperate needle-leaved forest	47	15	844	17	
<b>Ecohealth rating</b>	Healthy	4	1	97	2	
	Good	125	39	2,146	43	
	Fair	115	35	1,760	35	
	Poor	43	13	323	6	
	Severely degraded	18	6	84	2	
	Unrated	19	6	601	12	
<b>Human impacts</b>	Logging*	54	17	1,241	25	
	Informal trails	107	33			
	Homeless camps	21	6			
	Soil compaction	14	4			
	Domestic animals	44	14			
<b>Other wildlife-relevant factors</b>	Non-native plant cover	247	76	849**	17	21
	Canopy closure	305	100			70
	Hydrophilic vegetation	182	56			
	Beaver evidence	0	0			

\*Units still showing direct evidence of logging (cut stumps).

\*\*21% of the total acreage (4,042) for the 247 units.

## Appendix B: Tables

**Table 2.** Major creeks of Forest Park ranked by watershed area. For most creeks, 30 to 75% of the watershed lies outside the park boundary.

Creek	Watershed (acres)	Management unit
Balch	1,401	South
Saltzman/Rocking Chair	956	Central
Miller	739	North
Doane	722	Central
Linnton	376	North
Newton	319	North
Springville	264	Central

Table 3. Common plants of Forest Park.

Type	Common name	Scientific name
Tree	Bigleaf maple	<i>Acer macrophyllum</i>
	Douglas-fir	<i>Pseudotsuga menziesii</i>
	Grand fir	<i>Abies grandis</i>
	Red alder	<i>Alnus rubra</i>
	Western hemlock	<i>Tsuga heterophylla</i>
	Western redcedar	<i>Thuja plicata</i>
	Oregon oak	<i>Quercus garryana</i>
	Oregon ash	<i>Fraxinus latifolia</i>
Shrub	English holly	<i>Ilex aquifolium</i> (non-native)
	Beaked hazel	<i>Corylus cornuta</i>
	Indian plum	<i>Oemleria cerasiformis</i>
	Oregon grape	<i>Mahonia aquifolium</i>
	Red elderberry	<i>Sambucus racemosa</i>
	Red huckleberry	<i>Vaccinium parvifolium</i>
	Salal	<i>Gaultheria shallon</i>
	Salmonberry	<i>Rubus spectabilis</i>
	Thimbleberry	<i>Rubus parviflorus</i>
	Vine maple	<i>Acer circinatum</i>
	Himalayan blackberry	<i>Rubus armeniacus</i> (non-native)
Groundcover	Ducks foot	<i>Vancouveria hexandra</i>
	English ivy	<i>Hedera helix</i> (non-native)
	Maidenhair fern	<i>Adiantum aleuticum</i>
	Pacific waterleaf	<i>Hydrophyllum tenuipes</i>
	Stream violet	<i>Viola glabella</i>
	Sword fern	<i>Polystichum munitum</i>
	Trailing blackberry	<i>Rubus ursinus</i>
	Trillium	<i>Trillium grandiflorum</i>
	Vanilla leaf	<i>Achylys triphylla</i>

### Forest Park Wildlife Inventory

Table 4: Birds of interest for Forest Park grouped by occurrence and listed taxonomically. Seasons are “A” for all, “S” for spring and summer breeding season, “W” for winter, “M” for migration in spring and fall, and “U” for undetermined seasonal pattern.

Common name	Scientific name	Taxon	Occurrence	Breeding	TEES		
					Special Status	Species	Non-native
Mallard	<i>Anas platyrhynchos</i>	Waterfowl	Occurs	Unknown			A
Great blue heron	<i>Ardea herodias</i>	Heron	Occurs	Non-breeder	✓		A
Turkey vulture	<i>Cathartes aura</i>	Raptor	Occurs	Unknown			S
Osprey	<i>Pandion haliaetus</i>	Raptor	Occurs	Non-breeder			S
Bald eagle	<i>Haliaeetus leucocephalus</i>	Raptor	Occurs	Breeds	✓		A
Sharp-shinned hawk	<i>Accipiter striatus</i>	Raptor	Occurs	Breeds			A
Cooper's hawk	<i>Accipiter cooperii</i>	Raptor	Occurs	Breeds			A
Red-tailed hawk	<i>Buteo jamaicensis</i>	Raptor	Occurs	Breeds			A
Peregrine falcon	<i>Falco peregrinus</i>	Raptor	Occurs	Breeds	✓		A
Rock pigeon	<i>Columba livia</i>	Dove	Occurs	Undetermined		✓	A
Band-tailed pigeon	<i>Patagioenas fasciata</i>	Dove	Occurs	Breeds	✓		S
Mourning dove	<i>Zenaidura macroura</i>	Dove	Occurs	Non-breeder			A
Western screech-owl	<i>Megascops kennicottii</i>	Owl	Occurs	Breeds			A
Great horned owl	<i>Bubo virginianus</i>	Owl	Occurs	Breeds			A
Northern pygmy-owl	<i>Glaucidium gnoma</i>	Owl	Occurs	Breeds			A
Barred owl	<i>Strix varia</i>	Owl	Occurs	Breeds		✓	A
Northern saw-whet owl	<i>Aegolius acadicus</i>	Owl	Occurs	Breeds			A
Vaux's swift	<i>Chaetura vauxi</i>	Swift	Occurs	Breeds	✓		S
Anna's hummingbird	<i>Calypte anna</i>	Hummingbird	Occurs	Breeds			A
Rufous hummingbird	<i>Selasphorus rufus</i>	Hummingbird	Occurs	Breeds	✓		S
Red-breasted sapsucker	<i>Sphyrapicus ruber</i>	Woodpecker	Occurs	Breeds			S
Downy woodpecker	<i>Picoides pubescens</i>	Woodpecker	Occurs	Breeds	✓		A
Hairy woodpecker	<i>Picoides villosus</i>	Woodpecker	Occurs	Breeds			A
Northern flicker	<i>Colaptes auratus</i>	Woodpecker	Occurs	Breeds			A
Pileated woodpecker	<i>Dryocopus pileatus</i>	Woodpecker	Occurs	Breeds	✓		A
Olive-sided flycatcher	<i>Contopus cooperi</i>	Flycatcher	Occurs	Breeds	✓		S

# Appendix B: Tables

Common name	Scientific name	Taxon	Occurrence	Breeding	TEES	
					Special Status	Non-native
Western wood-pewee	<i>Contopus sordidulus</i>	Flycatcher	Occurs	Breeds	✓	S
Willow flycatcher (little)	<i>Empidonax traillii brewsteri</i>	Flycatcher	Occurs	Undetermined	✓	S
Hammond's flycatcher	<i>Empidonax hammondi</i>	Flycatcher	Occurs	Undetermined		S
Pacific-slope flycatcher	<i>Empidonax difficilis</i>	Flycatcher	Occurs	Breeds	✓	S
Cassin's vireo	<i>Vireo cassinii</i>	Vireo	Occurs	Breeds		S
Hutton's vireo	<i>Vireo huttoni</i>	Vireo	Occurs	Breeds	✓	S
Warbling vireo	<i>Vireo gilvus</i>	Vireo	Occurs	Breeds		S
Gray jay	<i>Perisoreus canadensis</i>	Corvid	Occurs	Breeds		A
Steller's jay	<i>Cyanocitta stelleri</i>	Corvid	Occurs	Breeds		A
Western scrub-jay	<i>Aphelocoma californica</i>	Corvid	Occurs	Breeds		A
American crow	<i>Corvus brachyrhynchos</i>	Corvid	Occurs	Breeds		A
Common raven	<i>Corvus corax</i>	Corvid	Occurs	Breeds		A
Tree swallow	<i>Tachycineta bicolor</i>	Swallow	Occurs	Undetermined		S
Violet-green swallow	<i>Tachycineta thalassina</i>	Swallow	Occurs	Undetermined		S
Barn swallow	<i>Hirundo rustica</i>	Swallow	Occurs	Breeds		S
Black-capped chickadee	<i>Poecile atricapillus</i>	Chickadee	Occurs	Breeds		A
Chestnut-backed chickadee	<i>Poecile rufescens</i>	Chickadee	Occurs	Breeds		A
Bushtit	<i>Psaltiriparus minimus</i>	Bushtit	Occurs	Breeds	✓	A
Red-breasted nuthatch	<i>Sitta canadensis</i>	Nuthatch	Occurs	Breeds		A
White-breasted nuthatch (SB)	<i>Sitta carolinensis aculeata</i>	Nuthatch	Occurs	Undetermined	✓	U
Brown creeper	<i>Certhia americana</i>	Creeper	Occurs	Breeds	✓	A
Bewick's wren	<i>Thryomanes bewickii</i>	Wren	Occurs	Breeds		A
House wren	<i>Troglodytes aedon</i>	Wren	Occurs	Non-breeder	✓	A
Pacific wren	<i>Troglodytes pacificus</i>	Wren	Occurs	Breeds	✓	A
Golden-crowned kinglet	<i>Regulus satrapa</i>	Kinglet	Occurs	Non-breeder		W
Ruby-crowned kinglet	<i>Regulus calendula</i>	Kinglet	Occurs	Non-breeder		W
Townsend's solitaire	<i>Myadestes townsendi</i>	Thrush	Occurs	Non-breeder		M
Swainson's thrush	<i>Catharus ustulatus</i>	Thrush	Occurs	Breeds	✓	S
Hermit thrush	<i>Catharus guttatus</i>	Thrush	Occurs	Non-breeder		W

Common name	Scientific name	Taxon	Occurrence	Breeding	TEES		
					Special Status	Species	Non-native
American robin	<i>Turdus migratorius</i>	Thrush	Occurs	Breeds			A
Varied thrush	<i>Ixoreus naevius</i>	Thrush	Occurs	Breeds	✓		W
European starling	<i>Sturnus vulgaris</i>	Starling	Occurs	Non-breeder			✓ A
Cedar waxwing	<i>Bombycilla cedrorum</i>	Waxwing	Occurs	Undetermined			S
Orange-crowned warbler	<i>Oreothlypis celata</i>	Warbler	Occurs	Breeds	✓		S
Nashville warbler	<i>Oreothlypis ruficapilla</i>	Warbler	Occurs	Non-breeder	✓		M
MacGillivray's warbler	<i>Geothlypis tolmiei</i>	Warbler	Occurs	Unknown			M
Yellow warbler	<i>Setophaga petechia</i>	Warbler	Occurs	Unknown	✓		S
Yellow-rumped warbler	<i>Setophaga coronata</i>	Warbler	Occurs	Undetermined			S
Black-throated gray warbler	<i>Setophaga nigrescens</i>	Warbler	Occurs	Breeds	✓		S
Townsend's warbler	<i>Setophaga townsendi</i>	Warbler	Occurs	Breeds			S
Hermit warbler	<i>Setophaga occidentalis</i>	Warbler	Occurs	Undetermined	✓		M
Wilson's warbler	<i>Cardellina pusilla</i>	Warbler	Occurs	Breeds	✓		S
Spotted towhee	<i>Pipilo maculatus</i>	Sparrow	Occurs	Breeds			A
Chipping sparrow	<i>Spizella passerina</i>	Sparrow	Occurs	Non-breeder	✓		A
Fox sparrow	<i>Passerella iliaca</i>	Sparrow	Occurs	Non-breeder			M
Song sparrow	<i>Melospiza melodia</i>	Sparrow	Occurs	Breeds			A
Lincoln's sparrow	<i>Melospiza lincolni</i>	Sparrow	Occurs	Non-breeder			M
White-throated sparrow	<i>Zonotrichia albicollis</i>	Sparrow	Occurs	Non-breeder			W
White-crowned sparrow	<i>Zonotrichia leucophrys</i>	Sparrow	Occurs	Breeds			A
Golden-crowned sparrow	<i>Zonotrichia atricapilla</i>	Sparrow	Occurs	Non-breeder			W
Dark-eyed junco	<i>Junco hyemalis</i>	Sparrow	Occurs	Breeds			A
Western tanager	<i>Piranga ludoviana</i>	Cardinal	Occurs	Breeds			S
Black-headed grosbeak	<i>Pheucticus melanocephalus</i>	Cardinal	Occurs	Breeds			S
Brewer's blackbird	<i>Euphagus cyanocephalus</i>	Blackbird	Occurs	Undetermined			A
Brown-headed cowbird	<i>Molothrus ater</i>	Blackbird	Occurs	Undetermined			S
Purple finch	<i>Carpodacus purpureus</i>	Finch	Occurs	Breeds	✓		S
House finch	<i>Carpodacus mexicanus</i>	Finch	Occurs	Breeds			M
Red crossbill	<i>Loxia curvirostra</i>	Finch	Occurs	Non-breeder	✓		A
Pine siskin	<i>Spinus pinus</i>	Finch	Occurs	Breeds			A

# Appendix B: Tables

Common name	Scientific name	Taxon	Occurrence	Breeding	TEES	
					Special Status	Non-native
Lesser goldfinch	<i>Spinus psaltria</i>	Finch	Occurs	Undetermined		M
American goldfinch	<i>Spinus tristis</i>	Finch	Occurs	Breeds		A
Evening grosbeak	<i>Coccothraustes vespertinus</i>	Finch	Occurs	Non-breeder		A
House sparrow	<i>Passer domesticus</i>	Passerid	Occurs	Breeds		✓ A
American kestrel	<i>Falco sparverius</i>	Raptor	Rare	Non-breeder	✓	A
Merlin	<i>Falco columbarius</i>	Raptor	Rare	Non-breeder	✓	W
Northern spotted owl	<i>Strix occidentalis caurina</i>	Owl	Rare	Non-breeder	*	U
Common nighthawk	<i>Chordeiles minor</i>	Nighthawk	Rare	Non-breeder	✓	S
Lewis's woodpecker	<i>Melanerpes lewis</i>	Woodpecker	Rare	Non-breeder	✓	M
Dusky flycatcher	<i>Empidonax oberholseri</i>	Flycatcher	Rare	Non-breeder		M
Ash-throated flycatcher	<i>Myiarchus cinerascens</i>	Flycatcher	Rare	Non-breeder		M
Western kingbird	<i>Tyrannus verticalis</i>	Flycatcher	Rare	Non-breeder		S
Red-eyed vireo	<i>Vireo olivaceus</i>	Vireo	Rare	Non-breeder	✓	S
American dipper	<i>Cinclus mexicanus</i>	Dipper	Rare	Non-breeder		W
Lazuli bunting	<i>Passerina amoena</i>	Cardinal	Rare	Non-breeder		S
Pine grosbeak	<i>Pinicola enucleator</i>	Finch	Rare	Non-breeder		M
California quail	<i>Callipepla californica</i>	Landfowl	Extirpated	Non-breeder		
Mountain quail	<i>Oreortyx pictus</i>	Landfowl	Extirpated	Non-breeder		
Ruffed grouse	<i>Bonasa umbellus</i>	Landfowl	Extirpated	Non-breeder		
Sooty grouse	<i>Dendragapus fuliginosus</i>	Landfowl	Extirpated	Non-breeder		

\*Federally threatened, not listed by TEES.

**Table 5.** Mammals of interest for Forest Park listed by occurrence and alphabetically by mammalian order and scientific name.

Common name	Scientific name	Order	Occurrence	Breeding	TEES Special Status Species	Non-native
Elk	<i>Cervus canadensis</i>	Artiodactyla	Occurs	Non-breeder		
Mule deer	<i>Odocoileus hemionus</i>	Artiodactyla	Occurs	Breeds		
Coyote	<i>Canis latrans</i>	Carnivora	Occurs	Breeds		
Bobcat	<i>Lynx rufus</i>	Carnivora	Occurs	Breeds		
Striped skunk	<i>Mephitis mephitis</i>	Carnivora	Occurs	Breeds		
Short-tailed weasel	<i>Mustela erminea</i>	Carnivora	Occurs	Breeds		
Long-tailed weasel	<i>Mustela frenata</i>	Carnivora	Occurs	Breeds		
Raccoon	<i>Procyon lotor</i>	Carnivora	Occurs	Breeds		
Western spotted skunk	<i>Spilogale putorius</i>	Carnivora	Occurs	Breeds		
Long-eared myotis	<i>Myotis evotis</i>	Chiroptera	Occurs	Undetermined	✓	
Long-legged myotis	<i>Myotis volans</i>	Chiroptera	Occurs	Undetermined	✓	
Yuma myotis	<i>Myotis yumanensis</i>	Chiroptera	Occurs	Undetermined	✓	
Big brown bat	<i>Eptesicus fuscus</i>	Chiroptera	Occurs	Undetermined		
Silver-haired bat	<i>Lasionycteris noctivagans</i>	Chiroptera	Occurs	Undetermined	✓	
Hoary bat	<i>Lasiurus cinereus</i>	Chiroptera	Occurs	Undetermined	✓	
California myotis	<i>Myotis californicus</i>	Chiroptera	Occurs	Undetermined	✓	
Little brown bat	<i>Myotis lucifugus</i>	Chiroptera	Occurs	Undetermined		
Fringed myotis	<i>Myotis thysanodes</i>	Chiroptera	Occurs	Undetermined	✓	
Western big-eared bat	<i>Corynorhinus townsendii</i>	Chiroptera	Occurs	Undetermined	✓	
Brush rabbit	<i>Sylvilagus bachmani</i>	Lagomorpha	Occurs	Breeds		
Virginia opossum	<i>Didelphis virginiana</i>	Marsupial	Occurs	Breeds		✓
Mountain beaver	<i>Aplodontia rufa</i>	Rodentia	Occurs	Breeds		
Northern flying squirrel	<i>Glaucomys sabrinus</i>	Rodentia	Occurs	Breeds		
Creeping vole	<i>Microtus oregoni</i>	Rodentia	Occurs	Breeds		
Townsend's vole	<i>Microtus townsendii</i>	Rodentia	Occurs	Breeds		
Deer mouse	<i>Peromyscus maniculatus</i>	Rodentia	Occurs	Breeds		✓
Norway rat	<i>Rattus norvegicus</i>	Rodentia	Occurs	Breeds		✓
Black rat	<i>Rattus rattus</i>	Rodentia	Occurs	Breeds		✓
Eastern gray squirrel	<i>Sciurus carolinensis</i>	Rodentia	occurs	breeds		



# Appendix B: Tables

Common name	Scientific name	Order	Occurrence	Breeding	TEES Special Status	Non-native
Eastern fox squirrel	<i>Sciurus niger</i>	Rodentia	Occurs	Breeds		✓
Townsend's chipmunk	<i>Tamias townsendii</i>	Rodentia	Occurs	Breeds		
Douglas squirrel	<i>Tamiasciurus douglasii</i>	Rodentia	Occurs	Breeds		
Shrew mole	<i>Neurotrichus gibbsii</i>	Soricomorpha	Occurs	Breeds		
Coast mole	<i>Scapanus orarius</i>	Soricomorpha	Occurs	Breeds		
Townsend's mole	<i>Scapanus townsendii</i>	Soricomorpha	Occurs	Breeds		
Trowbridges shrew	<i>Sorex trowbridgii</i>	Soricomorpha	Occurs	Breeds		
Vagrant shrew	<i>Sorex vagrans</i>	Soricomorpha	Occurs	Breeds		
Cougar	<i>Felis concolor</i>	Carnivora	Rare	Non-breeder		
Black bear	<i>Ursus americanus</i>	Carnivora	Rare	Non-breeder		
Red fox	<i>Vulpes vulpes</i>	Carnivora	Rare	Undetermined		
American beaver	<i>Castor canadensis</i>	Rodentia	Rare	Non-breeder	✓	
North american porcupine	<i>Erethizon dorsatum</i>	Rodentia	Rare	Undetermined		
Pacific jumping mouse	<i>Zapus trinotatus</i>	Rodentia	Rare	Breeds		
Pacific water shrew	<i>Sorex bendirii</i>	Soricomorpha	Rare	Breeds		
American marten	<i>Martes americana</i>	Carnivora	Historical	Not applicable	✓	
Gray fox	<i>Urocyon cinereoargenteus</i>	Carnivora	Historical	Not applicable		
Red tree vole	<i>Arborimus longicaudus</i>	Rodentia	Historical	Not applicable	✓	
White-footed vole	<i>Arborimus albipes</i>	Rodentia	Undetermined	Undetermined	✓	
Western red-backed vole	<i>Clethrionomys californicus</i>	Rodentia	Undetermined	Undetermined		
Gray-tailed vole	<i>Microtus canicaudus</i>	Rodentia	Undetermined	Undetermined		
Long-tailed vole	<i>Microtus longicaudus</i>	Rodentia	Undetermined	Undetermined		
Bushy-tailed woodrat	<i>Neotoma cinerea</i>	Rodentia	Undetermined	Undetermined		
Dusky footed woodrat	<i>Neotoma fuscipes</i>	Rodentia	Undetermined	Undetermined		
Camas pocket gopher	<i>Thomomys bulbivorus</i>	Rodentia	Undetermined	Undetermined	✓	
Mazama pocket gopher	<i>Thomomys mazama</i>	Rodentia	Undetermined	Undetermined		
Dusky shrew	<i>Sorex monticolus</i>	Soricomorpha	Undetermined	Undetermined		

**Table 6.** Amphibians, reptiles, and fish of interest for Forest Park.

Class	Common name	Scientific name	Group	Occurrence	Breeding	TEES Special Status		Habitat association in Forest Park
						Species	Status	
<b>Amphibians</b>	Pacific treefrog	<i>Pseudacris regilla</i>	Frog	Occurs	Breeds			Pond breeding
	Northern red-legged frog	<i>Rana aurora</i>	Frog	Occurs	Breeds	✓		Pond breeding
	Ensatina	<i>Ensatina eschscholtzii</i>	Salamander	Occurs	Breeds			Terrestrial breeding
	Dunn's salamander	<i>Plethodon dunni</i>	Salamander	Occurs	Breeds			Stream breeding
	Western red-backed salamander	<i>Plethodon vehiculum</i>	Salamander	Occurs	Breeds			Terrestrial breeding
	Rough-skinned newt	<i>Taricha granulosa</i>	Salamander	Occurs	Breeds			Pond breeding
	Coastal giant salamander	<i>Dicamptodon tenebrosus</i>	Salamander	Occurs	Breeds			Stream breeding
	Northwestern salamander	<i>Ambystoma gracile</i>	Salamander	Undetermined	Undetermined			Pond breeding
	Long-toed salamander	<i>Ambystoma macrodactylum</i>	Salamander	Undetermined	Undetermined			
	Clouded salamander	<i>Aneides ferreus</i>	Salamander	Undetermined	Undetermined			
	Oregon slender salamander	<i>Batrachoseps wrighti</i>	Salamander	Undetermined	Undetermined	✓		
	Common garter snake	<i>Thamnophis sirtalis</i>	Snake	Occurs	Breeds			Forest openings
	Northwestern garter snake	<i>Thamnophis ordinoides</i>	Snake	Occurs	Breeds			Forest openings
<b>Reptiles</b>	Northern alligator lizard	<i>Elgaria coerulea</i>	Lizard	Rare	Breeds			Rock quarry
	Rubber boa	<i>Charina bottae</i>	Snake	Undetermined	Undetermined			Forest
	Ring-necked snake	<i>Diadophis punctatus</i>	Snake	Undetermined	Undetermined			
	Western skink	<i>Plestiodon skiltonianus</i>	Lizard	Undetermined	Undetermined			
	Western fence lizard	<i>Sceloporus occidentalis</i>	Lizard	Undetermined	Undetermined			
	Southern alligator lizard	<i>Elgaria multicarinata</i>	Lizard	Undetermined	Undetermined			
	Coastal cutthroat trout	<i>Oncorhynchus clarkii clarkii</i>	Salmonid	Occurs	Breeds	✓*		Balch, Miller creeks
	Coho salmon	<i>Oncorhynchus kisutch</i>	Salmonid	Occurs	Breeds	✓		Miller Creek only
<b>Fish</b>	Steelhead	<i>Oncorhynchus mykiss</i>	Salmonid	Occurs	Breeds	✓*		Miller Creek only
	Sculpin	<i>Cottus</i> sp.	Cottid	Occurs	Breeds			some major creeks

\*Listed as Sensitive or Threatened species under the federal Endangered Species Act; not also listed by TEES.

**Table 7.** Mollusks of interest for Forest Park grouped by type and occurrence, and listed alphabetically by scientific name. Microsnails have a shell diameter <3 mm.

Common Name	Scientific Name	Habitat	Type	Occurrence	Breeding
Banana slug	<i>Ariolimax columbianus</i>	Terrestrial	Slug	Occurs	Breeds
European red slug	<i>Arion rufus</i>	Terrestrial	Slug	Occurs	Breeds
Reticulate tailedropper slug	<i>Prophysaon andersoni</i>		Slug	Occurs	Breeds
Yellow-bordered tailedropper slug	<i>Prophysaon foliolatum</i>		Slug	Occurs	Breeds
Northwest hesperian	<i>Vespericola columbiana</i>		Slug	Occurs	Breeds
Cochlicopa lubrica	<i>Cochlicopa lubrica</i>		Snail	Occurs	Breeds
Pygmy Oregonian	<i>Cryptotomastix germana germana</i>		Snail	Occurs	Breeds
garden snail	<i>Cryptomphalus aspersus</i>		Snail	Occurs	Breeds
Robust lancetooth	<i>Haplotrema vancouverense</i>		Snail	Occurs	Breeds
Oregon megomphix	<i>Megomphix hemphilli</i>		Snail	Occurs	Breeds
Pacific sideband snail	<i>Monadenia fidelis fidelis</i>		Snail	Occurs	Breeds
Oregon forestsnail	<i>Allogona townsendiana</i>		Snail	Does not occur	Not applicable
Western thorn	<i>Carychium occidentale</i>		Microsnail	Occurs	Breeds
Toothless column snail	<i>Columella edentula</i>		Microsnail	Occurs	Breeds
Paralaoma servilis	<i>Paralaoma servilis</i>		Microsnail	Occurs	Breeds
Broadwhorl tightcoil	<i>Pristiloma johnsonii</i>		Microsnail	Occurs	Breeds
Denticulate tightcoil	<i>Pristiloma langsingi</i>		Microsnail	Occurs	Breeds
Conical spot	<i>Punctum randolphi</i>		Microsnail	Occurs	Breeds
<i>Pupilla hebes</i>	<i>Pupilla hebes</i>		Microsnail	Occurs	Breeds
Cross vertigo	<i>Vertigo modesta</i>		Microsnail	Occurs	Breeds
<i>Zonitoides nitidus</i>	<i>Zonitoides nitidus</i>		Microsnail	Occurs	Breeds
Ramshorn snail	Planorbidae	Aquatic	Freshwater snail	Occurs	Breeds
Pleurocerid	<i>Juga sp.</i>		Freshwater snail	Occurs	Breeds
Pea clam	Pisidiidae		Bivalve	Occurs	Breeds
Floater	<i>Anodonta sp.</i>		Bivalve	Does not occur	Not applicable
Western pearlshell	<i>Margaritifera falcata</i>		Bivalve	Does not occur	Not applicable
Western ridged mussel	<i>Gonidea angulata</i>		Bivalve	Does not occur	Not applicable
Asian clam	<i>Corbicula fluminea</i>		Bivalve	Does not occur	Not applicable

**Table 8.** Species of interest to Forest Park that are either listed, candidate, sensitive, or of concern at the state or federal levels.

Group	Common name	Scientific name	Federal	Oregon	Forest Park occurrence	Forest Park breeding
Birds	Bald eagle	<i>Haliaeetus leucocephalus</i>	(delisted)	Threatened	Occurs	Breeds
	Peregrine falcon	<i>Falco peregrinus</i>	(delisted)	Sensitive, Vuln.	Occurs	Breeds
	Band-tailed pigeon	<i>Patagioenas fasciata</i>	of Concern		Occurs	Breeds
	Northern spotted owl	<i>Strix occidentalis caurina</i>	Threatened		Rare	Non-breeder
	Common nighthawk	<i>Chordeiles minor</i>		Sensitive, Crit.	Rare	Non-breeder
	Lewis's woodpecker	<i>Melanerpes lewis</i>	of Concern	Sensitive, Crit.	Rare	Non-breeder
	Pileated woodpecker	<i>Dryocopus pileatus</i>		Sensitive, Vuln.	Occurs	Breeds
	Olive-sided flycatcher	<i>Contopus cooperi</i>	of Concern	Sensitive, Vuln.	Occurs	Breeds
	American marten	<i>Martes americana</i>	Candidate	Sensitive, Vuln.	Historical	N/a
	Red tree vole	<i>Arborimus longicaudus</i>	Candidate	Sensitive, Vuln.	Historical	N/a
Mammals	White-footed vole	<i>Arborimus albipes</i>	of Concern		Undetermined	Undetermined
	Camas pocket gopher	<i>Thomomys bulbivorus</i>	of Concern		Undetermined	Undetermined
	Western gray squirrel	<i>Sciurus griseus</i>		Sensitive, Vuln.	Does not occur	N/a
	Silver-haired bat	<i>Lasionycteris noctivagans</i>	of Concern	Sensitive, Vuln.	Occurs	Undetermined
	Fringed myotis	<i>Myotis thysanodes</i>	of Concern	Sensitive, Vuln.	Occurs	Undetermined
	Western big-eared bat	<i>Corynorhinus townsendii</i>	of Concern	Sensitive, Crit.	Occurs	Undetermined
	Long-eared myotis	<i>Myotis evotis</i>	of Concern		Occurs	Undetermined
	Long-legged myotis	<i>Myotis volans</i>	of Concern	Sensitive, Vuln.	Occurs	Undetermined
	Yuma myotis	<i>Myotis yumanensis</i>	of Concern		Occurs	Undetermined
	California myotis	<i>Myotis californicus</i>		Sensitive, Vuln.	Occurs	Undetermined
Amphibians	Northern red-legged frog	<i>Rana aurora</i>	of Concern	Sensitive, Vuln.	Occurs	Breeds
	Oregon slender salamander	<i>Batrachoseps wrighti</i>	of Concern	Sensitive, Vuln.	Does not occur	N/a
Fish	Coastal cutthroat trout	<i>Oncorhynchus clarkii clarkii</i>	of Concern	Sensitive, Vuln.	Occurs	Breeds
	Steelhead	<i>Oncorhynchus mykiss</i>	Threatened	Sensitive, Crit.	Occurs	N/a

Sources: U.S. Fish and Wildlife Service, Oregon Fish and Wildlife Office, 14 January 2012, and Oregon Department of Fish and Wildlife, 2008.

## Appendix B: Tables

**Table 9.** Oregon-wide USGS Breeding Bird Survey (BBS) population trends, 1966–2009, for TEES Special Status bird species of interest for Forest Park.<sup>120</sup> Trends shown in red have the highest possible confidence and credibility ratings for the available data.

Common name	Scientific name	Trend : avg. annual %	Trend confidence	Data Credibility
Great blue heron	<i>Ardea herodias</i>	−0.9	Low	Low
Bald eagle	<i>Haliaeetus leucocephalus</i>	5.6	Moderate	Medium low
American kestrel	<i>Falco sparverius</i>	−1.6	Moderate	Moderate
Merlin	<i>Falco columbarius</i>	5.0	Low*	Medium low
Peregrine falcon	<i>Falco peregrinus</i>	26.0	Moderate	Medium low
Band-tailed pigeon	<i>Patagioenas fasciata</i>	−0.5	Low	Moderate
Northern spotted owl	<i>Strix occidentalis caurina</i>	−3.7	High**	High
Common nighthawk	<i>Chordeiles minor</i>	−1.1	Low	Moderate
Vaux's swift	<i>Chaetura vauxi</i>	1.0	Low	Moderate
Rufous hummingbird	<i>Selasphorus rufus</i>	−3.1	Moderate	Moderate
Lewis's woodpecker	<i>Melanerpes lewis</i>	−2.9	Low	Medium low
Downy woodpecker	<i>Picoides pubescens</i>	−0.3	Low	Low
Pileated woodpecker	<i>Dryocopus pileatus</i>	2.1	Moderate	Low
Olive-sided flycatcher	<i>Contopus cooperi</i>	−3.0	Moderate	Moderate
Western wood-pewee	<i>Contopus sordidulus</i>	−1.7	Moderate	Moderate
Willow/alder flycatcher	<i>Empidonax</i> spp.***	−5.6	Moderate	Moderate
Pacific-slope/Cordilleran flycatcher	<i>Empidonax</i> spp.***	−3.2	Moderate	Moderate
Hutton's vireo	<i>Vireo huttoni</i>	4.4	Moderate	Low
Red-eyed vireo	<i>Vireo olivaceus</i>	0.5	Low	Medium low
Bushtit	<i>Psaltiriparus minimus</i>	−3.7	Moderate	Moderate
White-breasted nuthatch	<i>Sitta carolinensis</i>	−0.2	Low	Low
Brown creeper	<i>Certhia americana</i>	0.1	Low	Low
House wren	<i>Troglodytes aedon</i>	−3.1	Moderate	Moderate
Pacific wren	<i>Troglodytes pacificus</i>	−0.2	Low	Moderate
Swainson's thrush	<i>Catharus ustulatus</i>	−1.2	Moderate	Moderate
Varied thrush	<i>Ixoreus naevius</i>	−2.3	Moderate	Moderate
Orange-crowned warbler	<i>Oreothlypis celata</i>	−3.2	Moderate	Moderate
Nashville warbler	<i>Oreothlypis ruficapilla</i>	−0.2	Low	Moderate
Yellow warbler	<i>Setophaga petechia</i>	−3.1	Moderate	Moderate
Black-throated gray warbler	<i>Setophaga nigrescens</i>	−2.5	Moderate	Moderate
Hermit warbler	<i>Setophaga occidentalis</i>	0.0	Low	Moderate
Wilson's warbler	<i>Cardellina pusilla</i>	−1.4	Moderate	Moderate
Chipping sparrow	<i>Spizella passerina</i>	−2.2	Moderate	Moderate
Purple finch	<i>Carpodacus purpureus</i>	−1.6	Moderate	Moderate
Red crossbill	<i>Loxia curvirostra</i>	1.4	Low	Low

Trend confidence: “Low” indicates the 95% confidence interval (CI) includes zero. “Moderate” indicates the 95% CI does not include zero.

Data credibility: “Low” has an important deficiency; “medium low” has a deficiency; “moderate” is of moderate precision with possible deficiencies; “high” is supported by intense research unrelated to the BBS. Moderate is the highest possible rating for BBS data and trends. More information available at the USGS BBS web site: <http://www.mbr-pwrc.usgs.gov/bbs>

\*BBS data for Washington state. Data for Oregon not available.

\*\*Northern spotted owl trend data from Forsman et. al. 2012.<sup>51</sup>

\*\*\*Though currently separate species, these two were taxonomically combined during much of the survey period.

**Table 10.** Data sources for the Forest Park wildlife inventory.

Topic	Contributors	Title	Field years / report date	Organization	Document/data type	Methods	No. of surveys	No. of captures or specimens	No. of sites or transects, area	No. of mgmt units (1–3)
All taxa	PP&R, Deshler, J., Felice, R., Petersen-Morgan, K., Roth, E; Brimecombe, T., Bushman, M., Corkran, C., Engel, S., Guderyahn, L., Helzer, D., Hiatt, J., Hitchcox, M., Houle, M., Hurley, S., LaBonte, J., Lagasa, E., Marshall, C., Masta, S., Matthews, I., Mattson, M., Plissner, J., Reddick, K., Roberts, L., Smith, M., Swanson, S., Turner, C., Weil, K., Williamson, T., Young, M.	Summary Report from the BioBlitz for Forest Park Wildlife	2012	City of Portland	Report	Pit fall traps, sweep nets, acoustic bat surveys, call playback, in-stream surveys, riparian and terrestrial hand searches, transect birding by ear	30	89 vertebrate species, 9 mollusks, 149 arthropods	30	3
	Dietrich, Andrew	Stream-Associated Amphibian Habitat Assessment in the Portland-Vancouver Metropolitan Region	2011	PSU	Masters thesis	In-stream surveys	6	191 specimens, 3 species	6 sites	3
	Hayes, Marc	Amphibians and Reptiles in Forest Park: Composition and Constraints		Washington Department of Fish & Wildlife	Presentation	Informal surveys, habitat associations				
	Roberts, Laura	Woodland Amphibian Distribution in Parks and Greenspaces in Portland	2003–2005	PSU	Masters thesis	Terrestrial and riparian surveys		6 species	6 sites	2
	Young, M., Taylor, K., PP&R Environmental Education	Amphibian Monitoring Program: 2011 Field Season Results and Recommendations	2008–2011	City of Portland	Report	Terrestrial and riparian surveys		4 species	1 site	1
Arthropods	Edwards, Patrick	A Non-lethal Subsampling Procedure for Aquatic Macroinvertebrates	2007–2011	PSU	PhD dissertation	In-stream surveys for macroinverts	13	4,770 specimens; 24 families	1	1
	Hitchcox, Mark	Insects of Forest Park		USDA-Animal & Plant Health Inspection Service	Raw data					
	LaBonte, Jim	Insects of Forest Park	1997–2012	ODA	Raw data	Pitfall, Lindgren funnels, UV-light		>300 species	50 sites	3
Birds	Broshot, Nancy	A Decade of Change in Avian Abundance and Richness in FP	1993–1995 2003–2005	Linfield College	Presentation	Point counts			25 sites	3
	Buck, J., Price, B.	Bald Eagle Monitoring Program	2010–2012	USFWS	Raw data	Surveys		3 pairs	3 nest sites	2
	Gross, Wink	Trends in Avian Abundance near Pittock Mansion (presentation)	1990–2011		Raw data	Surveys, nest monitoring	3,025		1 transect, 275 days/yr	1

Topic	Contributors	Title	Field years / report date	Organization	Document/data type	Methods	No. of surveys	No. of captures or specimens	No. of sites or transects, area	No. of mgmt units (1-3)
Birds, amphibians, fish, habitat, mollusks, stream invertebrates	Hennings, Lori	Riparian Bird Communities in Portland	1999	Oregon State University	Masters thesis	Point counts	5	25 species, 126 detections	1	1
	Marshall, Dave	Transcript of Portland BES's conversation with D.B. Marshall, 10 November 2008	1940-1980	USFWS, retired	Informal discussion	Bird watching	n/a	n/a	n/a	3
	National Audubon Society, Audubon Society of Portland, W. Gross, Portland compiler	Christmas Bird Count database	1926-2011	Audubon Society	Raw data	Winter surveys	85	1-2 transects,1 day/yr		3
	Nehls, Harry		1960-2012		Informal discussion	Bird watching	n/a	n/a	n/a	3
	Portland Park Commissioners	1901 Park Commissioners Report	Before 1902	City of Portland	Annual report	Bird watching	unknown	77 species	unknown	unknown
Birds, amphibians, fish, habitat, mollusks, stream invertebrates	Portland Bureau of Environmental Services (BES)	Portland Watershed Management Plan (PAWMAP)	2008-2011	City of Portland	Management plan, natural areas monitoring	Bird point counts, stream electroshocking, surveys of woody debris volume				3
	Houle, Marci	One City's Wilderness	1982	Oregon Parks Foundation	Report	Bird point counts	25	55 species	25 sites	3
	Swingle, S., Forsman, E., Pederson, J., Peterson, B., Deshler, J.	Nest-tree Characteristics of 3 Barred Owl ( <i>Strix varia</i> ) and 1 Great Horned Owl ( <i>Bubo virginianus</i> ) Nests Obtained During Tree Climbing to Collect Prey Remains, Forest Park	2012	City of Portland	Report	Arboreal surveys	4	4 nests	4 sites	2
Birds, habitat, mammals	Deshler, John	Breeding Biology and Habitat Selection of Northern Pygmy- Owls	2007-2012	PSU	Masters thesis	Surveys	Habitat: 65 sites; owls: 300	105 small mammals as prey	Habitat: 65 sites, 325 plots; owls in all park acres	3
	Lev, E., Fugate, J., Sharp, L.	West Hills Study of Forest Wildlife Habitat	1992	Multnomah County	Report	Small mammal trapping	4	176 captures	4 transects	2
Habitat	Portland Parks & Recreation	Vegetation Summaries for Forest Park		City of Portland	Raw data	NVCS classification	324	n/a	All park acreage	3
Mammals	Dizney, Laurie	Zoonotic Disease Emergence : Host-Pathogen-Ecosystem Dynamics	2002-2004	PSU	PhD dissertation	Trapping		1,031 captures	1 site	1
	Forsman, E., Swingle, J.	Preliminary Investigation of Red Tree Vole ( <i>Arborimus langicaudus</i> ) Presence in Forest Park	2009-2012	USFS	Report	Arboreal surveys	6	0 red tree voles	16 sites inc. old-growth conifer and owl nest sites	2

Topic	Contributors	Title	Field years / report date	Organization	Document/data type	Methods	No. of surveys Thousands of park visits	No. of captures or specimens	No. of sites or transects, area	No. of mgmt units (1-3)
	Nilsen, Fred		2012	PP&R	Informal discussion	Wildlife watching; park management	4	30 captures, 7 species	2	3
	Perkins, J. Mark	Bats Within the Urban Growth Boundary of Portland	2002-2003	Greenspace Program	Report					2
	Richardson, D., PP&R	Forest Park Predators: Results from a Camera Study	2010-2011	Portland	Presentation	Motion detection camera surveys	588 camera days	13 mammal species	42 sites, 14 camera days/site	3
Mammals, habitat	Lichti, Nathan	Biogeography of Vascular Plants and Small Mammals in Portland	2004	PSU	Masters thesis	Trapping, squirrel point counts	16	182 captures, 7 species	2 sites, 16 transects	2
Mammals, carnivores, owls	PP&R, SWCA Environmental Consultants, and the University of Oregon	Predator Diets Project Summary Report	2012	City of Portland	Report	Dissection of predator scat and owls pellets; surveys for barred owl nests	40	386 small mammals	6 owl nest sites and 5 transects for coyote scats	3
Mollusks	Hodges, Nathan	Terrestrial Molluscs of an Urban Forest Fragment in Portland	2005	PSU	Senior thesis	Terrestrial hand searches	26	1,005	26 sites, 5 m radius each	1
	Smith, Al		2012	ODFW retired	Raw data	In-stream surveys w/ glass- bottomed viewer	4	0	3	3
Natural resources management	City Club Committee of Fifty, City of Portland staff	A Management Plan for Forest Park	1976	City of Portland	Management plan	n/a	n/a	n/a	n/a	n/a
	Houle, Marci	West Hills Wildlife Corridor Study	1990	Multnomah County	Report	n/a	n/a	n/a	n/a	n/a
	Munger, Thorton	History of Portland's Forest Park	1960	City Club	Report	n/a	n/a	n/a	n/a	n/a
	Peterson-Morgan, K., PP&R	Forest Park Ecological Prescriptions	2011	City of Portland	Management plan	n/a	n/a	n/a	n/a	n/a
	Portland Bureau of Planning	Northwest Hills Natural Areas Portection Plan	1991	City of Portland	Report	n/a	n/a	n/a	n/a	n/a
	Portland Bureau of Planning (Gronkowski, Sjulin, Brooks, Nilsen)	Forest Park Natural Resource Management Plan	1995	City of Portland	Management plan	n/a	n/a	n/a	n/a	n/a
	Portland Environmental Services	Terrestrial Ecology Enhancement Strategy	2011	Portland	Management plan	n/a	n/a	n/a	n/a	n/a



**Table 11.** Insects, spiders, millipedes, and other arthropods of Forest Park listed alphabetically by class, order, family, and genus.<sup>25,34,88,89</sup>

<b>Class</b>	<b>Order</b>	<b>Family</b>	<b>Scientific Name</b>	<b>Common name</b>
Arachnida		Amaurobiidae	<i>Callobius</i> sp.	Hacklemesh spider
		Araneidae	<i>Araneus diadematus</i>	Cross orbweaver
			<i>Cyclosa conica</i>	Trashline orbweaver
		Linyphiidae		Filmy dome spider
		Oxyopidae	<i>Oxyopes</i> sp.	Lynx spider
		Philodromidae	<i>Philodromus rufus</i>	Crab spider
		Salticidae		Jumping spider
		Theridiidae		Tangle-web spiders
		Thomisidae	<i>Bassaniana utahensis</i>	Crab spider
			<i>Misumena vatia</i>	Crab spider
		Ixodidae	<i>Ixodes</i> sp.	Tick
		Ceratolasmidae	<i>Dendrolasma mirabile</i>	Harvestmen
			<i>Hesperonemastoma</i> sp.	Harvestmen
		Phalangiidae	<i>Leptobunus</i> sp.	Harvestmen
		Sabaconidae	<i>Sabacon</i> sp.	Harvestmen
		Sironoidea	<i>Siro acaroides</i>	Harvestmen
		Trienonychidae	<i>Metanonychus setulus</i>	Harvestmen
				Centipede
			<i>Lithobius</i> sp.	Centipede
		Macrostermesidae	<i>Nearctodes mus</i>	Millipede
Diplopoda		Xystodesmidae	<i>Harpaphe haydeniana</i>	Clown millipede
		Hirudisomatidae	<i>Octoglena anura</i>	Millipede
		Spirolidae	<i>Tylobolus</i> sp.	Nocturnal millipede
				Springtail
Entognatha		Collembola		Two-pronged bristletails
		Diplura		Death watch beetle
Insecta		Coleoptera	<i>Coelostethus quadrulus</i>	Death watch beetle
			<i>Ernobius punctulatus</i>	Death watch beetle
			<i>Ernobius socialis</i>	Death watch beetle

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			<i>Hadrobregmus gibbicollis</i>	Death watch beetle
			<i>Priobium punctatus</i>	Death watch beetle
			<i>Vriletta decorata</i>	Death watch beetle
			<i>Xestobium affine</i>	Death watch beetle
	Bostrichidae		<i>Lyctus planicollis</i>	Powder post beetle
			<i>Melalgus confertus</i>	Bostrichid beetle
			<i>Rhyzopertha dominica</i>	Bostrichid beetle
			<i>Stephanopachys sobrinus</i>	Bostrichid beetle
	Bruchidae		<i>Acanthoscelides aureolus</i>	Bean weevil
	Buprestidae		<i>Agrilus politus</i>	Jewel beetle
			<i>Buprestis aurulenta</i>	Golden buprestid
			<i>Buprestis lyrata</i>	Jewel beetle
			<i>Buprestis subornata</i>	Jewel beetle
			<i>Chrysobothris femorata</i>	Jewel beetle
			<i>Chrysophaeana placida</i>	Jewel beetle
			<i>Melanophila acuminata</i>	Jewel beetle
	Canthanidae		<i>Podabrus piniphilus</i>	Soldier beetle
			<i>Podabrus pruinosus</i>	Soldier beetle
			<i>Silis lutea</i>	Soldier beetle
	Carabidae		<i>Agonum limbatum</i>	Ground beetle
			<i>Agonum muelleri</i>	Ground beetle
			<i>Anisodactylus binotatus</i>	Ground beetle
			<i>Calathus fuscipes</i>	Ground beetle
			<i>Calathus ruficollis</i>	Ground beetle
			<i>Carabus nemoralis</i>	Ground beetle
			<i>Dromius piceus</i>	Ground beetle
			<i>Harpalus affinis</i>	Ground beetle
			<i>Harpalus cordifer</i>	Ground beetle
			<i>Harpalus somnulentus</i>	Ground beetle
			<i>Nebria brevicollis</i>	European gazelle-beetle
			<i>Omus audouini</i>	Audouin's night-stalking tiger beetle
			<i>Omus dejeanii</i>	Greater night-stalking tiger beetle

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			<i>Platynus brunneomarginatus</i>	Ground beetle
			<i>Platynus ovipennis</i>	Ground beetle
			<i>Promecognathus crassus</i>	Ground beetle
			<i>Pterostichus algidus</i>	Ground beetle
			<i>Pterostichus crenicollis</i>	Ground beetle
			<i>Pterostichus lama</i>	Ground beetle
			<i>Pterostichus melanarius</i>	Ground beetle
			<i>Pterostichus pumilus</i>	Ground beetle
			<i>Scaphinotus angusticollis</i>	Ground beetle
			<i>Scaphinotus marginatus</i>	Ground beetle
			<i>Scaphinotus velutinus</i>	Ground beetle
			<i>Trechus obtusus</i>	Ground beetle
			<i>Zacotus matthewsii</i>	Ground beetle
		Cerambycidae	<i>Arhopalus asperatus</i>	Longhorn beetle
			<i>Arhopalus productus</i>	Longhorn beetle
			<i>Atimia confusa dorsalis</i>	Longhorn beetle
			<i>Brachyleptura dehiscens</i>	Longhorn beetle
			<i>Callidium cicatricosum</i>	Longhorn beetle
			<i>Centrodera dayi</i>	Longhorn beetle
			<i>Centrodera spurca</i>	Longhorn beetle
			<i>Clytus planifrons</i>	Longhorn beetle
			<i>Cosmosalia chrysocoma</i>	Longhorn beetle
			<i>Desmocerus aureipennis cribripennis</i>	Longhorn beetle
			<i>Dicentrus bidentatus</i>	Longhorn beetle
			<i>Dorcasina matthewsi</i>	Longhorn beetle
			<i>Eumicthus oedipus</i>	Longhorn beetle
			<i>Grammoptera subargentata</i>	Longhorn beetle
			<i>Holopleura marginata</i>	Longhorn beetle
			<i>Hybodera tuberculata</i>	Longhorn beetle
			<i>Leptalia macilenta</i>	Longhorn beetle
			<i>Leptura oblitterata oblitterata</i>	Longhorn beetle
			<i>Lepturopsis dolorosa</i>	Longhorn beetle

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			<i>Megasemum asperum</i>	Longhorn beetle
			<i>Necydalis diversicollis</i>	Longhorn beetle
			<i>Necydalis laevicollis</i>	Longhorn beetle
			<i>Necydalis laevipennis</i>	Longhorn beetle
			<i>Opsimus quadrilineatus</i>	Longhorn beetle
			<i>Ortholeptura valida</i>	Longhorn beetle
			<i>Phymatodes aeneus</i>	Longhorn beetle
			<i>Phymatodes decussatus decussatus</i>	Longhorn beetle
			<i>Phymatodes maculicollis</i>	Longhorn beetle
			<i>Phymatodes nitidus</i>	Longhorn beetle
			<i>Phymatodes oregonensis</i>	Longhorn beetle
			<i>Phymatodes testaceus</i>	Longhorn beetle
			<i>Pidonia gnathoides</i>	Longhorn beetle
			<i>Pidonia quadrata</i>	Longhorn beetle
			<i>Pidonia scripta</i>	Longhorn beetle
			<i>Plectrura spinicauda</i>	Longhorn beetle
			<i>Stenocorus vestitus</i>	Longhorn beetle
			<i>Stictoleptura canadensis cribricollis</i>	Longhorn beetle
			<i>Strophiona laeta</i>	Longhorn beetle
			<i>Xestoleptura behrensi</i>	Longhorn beetle
			<i>Xestoleptura crassicornis</i>	Longhorn beetle
			<i>Xestoleptura crassipes</i>	Longhorn beetle
			<i>Xylotrechus annosus emotus</i>	Longhorn beetle
			<i>Xylotrechus longitarsis</i>	Longhorn beetle
			<i>Xylotrechus mormanus</i>	Longhorn beetle
			<i>Xylotrechus nauticus</i>	Longhorn beetle
	Chrysomelidae		<i>Calligrapha californica</i>	Leaf beetle
			<i>Chrysomela mainensis interna</i>	Leaf beetle
			<i>Macrohaltica ambiens</i>	Alder flea beetle
			<i>Syneta hamata</i>	Leaf beetle
			<i>Timarcha intricata</i>	Leaf beetle
	Cleridae		<i>Boschella fasciata</i>	Checkered beetle

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			<i>Enoclerus eximus</i>	Checkered beetle
			<i>Enoclerus lecontei</i>	Checkered beetle
			<i>Enoclerus schaefferi</i>	Checkered beetle
			<i>Enoclerus sphegeus</i>	Checkered beetle
			<i>Phyllobaenus scaber</i>	Checkered beetle
	Coccinellidae		<i>Cycloneda polita</i>	Western blood-red lady beetle
			<i>Mulsantina picta</i>	Lady beetle
			<i>Psyllobora vigintimaculata</i>	Lady beetle
	Colydiidae		<i>Lasconotus complex</i>	Colydiid beetle
			<i>Lasconotus subcostulatus</i>	Colydiid beetle
			<i>Namunaria pacifica</i>	Colydiid beetle
			<i>Oxylaemus californicus</i>	Colydiid beetle
	Cucujidae		<i>Pediacus depressus</i>	Flat bark beetle
	Curculionidae		<i>Barypeithes pellucidus</i>	Hairy spider weevil
			<i>Dryophthorus americanus</i>	Weevil
			<i>Nemolestes incomptus</i>	Woods weevil
			<i>Otiorynchus ovatus</i>	Strawberry root weevil
			<i>Otiorynchus rugostriatus</i>	Rough strawberry root weevil
			<i>Otiorynchus singularis</i>	Clay-colored weevil
			<i>Panscopus gemmatus</i>	Weevil
			<i>Rhyncolus spretus</i>	Weevil
			<i>Sciopithes obscurus</i>	Weevil
	Elatridae		<i>Ampedus phoenicopterus</i>	Click beetle
			<i>Ampedus varipilis</i>	Click beetle
			<i>Sylvanelater furtivus</i>	Click beetle
	Elmidae			Riffle beetle
	Histeridae		<i>Platysoma lecontei</i>	Clown beetle
	Laemophloeidae		<i>Laemophloeus alternans</i>	Lined flat bark beetle
	Lampyridae		<i>Ellychnia hatchi</i>	Firefly
	Latridiidae		<i>Aridius nodifer</i>	Minute brown scavenger beetle
			<i>Melanophthalma distinguenda</i>	Minute brown scavenger beetle
	Leiodidae		<i>Pinodytes newelli</i>	Eyeless soil fungivore beetle

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	Lucanidae	<i>Platycerus oregonensis</i>	Oregon stag beetle
		<i>Sinodendron rugosum</i>	Rugose stag beetle
	Lycidae	<i>Dictyoptera simplicipes</i>	Red net-winged beetle
	Melandryidae	<i>Eustrophus tomentosus</i>	False darkling beetle
	Nitidulidae	<i>Eपुरaea avara</i>	Sap beetle
		<i>Pityophagus rufipennis</i>	Sap beetle
	Oedemeridae	<i>Oxaxis bicolor</i>	False blister beetle
	Pyrochroidae	<i>Dendroides ephemeroides</i>	Red beetle
	Monotomidae	<i>Monotoma longicollis</i>	Root-eating beetle
	Salpingidae	<i>Rhinosimus viridiaeneus</i>	Narrow-waisted bark beetle
Hemiptera	Scarabaeidae	<i>Dichelonyx</i> sp.	Scarab beetle
Coleoptera	Scirtidae	<i>Cyphon concinnus</i>	Marsh beetle
	Scolytidae	<i>Alniphagus aspericollis</i>	Alder bark beetle
		<i>Anisandrus dispar</i>	Pear-blight beetle
		<i>Carphoborus vandykei</i>	Bark beetle
		<i>Cryphalus pubescens</i>	Bark beetle
		<i>Cryphalus ruficollis ruficollis</i>	Bark beetle
		<i>Dendroctonus pseudotsugae</i>	Douglas-fir beetle
		<i>Dendroctonus valens</i>	Red turpentine beetle
		<i>Gnathotrichus retusus</i>	Ambrosia beetle
		<i>Gnathotrichus sulcatus</i>	Ambrosia beetle
		<i>Hylastes nigrinus</i>	Bark beetle
		<i>Hylastinus obscurus</i>	Bark beetle
		<i>Hylesinus californicus</i>	California ash bark beetle
		<i>Hylocurus hirtellus</i>	Bark beetle
		<i>Hylurgops porosus</i>	Bark beetle
		<i>Ips paraconfusus</i>	California five-spined engraver
		<i>Ips pini</i>	Pine engraver
		<i>Ips tridens englemanni</i>	Bark beetle
		<i>Monarthrum scutellare</i>	Oak ambrosia beetle
		<i>Phloeosinus hoppingi</i>	Bark beetle
		<i>Phloeosinus punctatus</i>	Western cedar bark beetle

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			<i>Pityogenes carinulatus</i>	Bark beetle
			<i>Pityokteines elegans</i>	Bark beetle
			<i>Pseudips concinnus</i>	Bark beetle
			<i>Pseudips mexicanus</i>	Bark beetle
			<i>Pseudohylesinus dispar dispar</i>	Bark beetle
			<i>Pseudohylesinus granulatus</i>	Bark beetle
			<i>Pseudohylesinus nebulosus nebulosus</i>	Bark beetle
			<i>Pseudohylesinus sericeus</i>	Bark beetle
			<i>Pseudohylesinus tsugae</i>	Bark beetle
			<i>Pseudopityophthorus pubipennis</i>	Bark beetle
			<i>Scolytus multistriatus</i>	Smaller European elm bark beetle
			<i>Scolytus oregoni</i>	Bark beetle
			<i>Scolytus rugulosus</i>	Shot-hole borer
			<i>Scolytus unispinosus</i>	Douglas-fir engraver
			<i>Trypodendron lineatum</i>	Lined ambrosia beetle
			<i>Trypophloeus salicis</i>	Bark beetle
			<i>Trypophloeus thatcheri</i>	Bark beetle
			<i>Xyleborinus attenuatus</i>	Ambrosia beetle
			<i>Xyleborinus saxesenii</i>	Lesser shot-hole borer
			<i>Xyleborus intrusus</i>	Ambrosia beetle
			<i>Xyleborus pfeili</i>	Ambrosia beetle
			<i>Xylosandrus germanus</i>	Black stem borer
			<i>Xyloterinus politus</i>	Ambrosia beetle
		Scaptiidae	<i>Anaspis rufa</i>	False flower beetle
		Silvanidae	<i>Silvanus bidentatus</i>	Silvanid flat bark beetle
		Staphylinidae	<i>Eusphalerum pothos</i>	Rove beetle
			<i>Xantholinus linearis</i>	Rove beetle
		Tenebrionidae		Darkling beetle
		Trachypachidae	<i>Trachypachus gibbsii</i>	False ground beetle
			<i>Trachypachus holmbergii</i>	False ground beetle
	Dermaptera	Forticulidae	<i>Forficula auricularia</i>	European earwig
	Diptera	Agromyzidae	<i>Chromatomyia tiarella</i>	Leaf miner

		Bibionidae	<i>Bibio vestitus</i>	March fly
		Blephariceridae		Net-winged midge
		Chironomidae		Midge
		Drosophilidae	<i>Drosophila suzukii</i>	Spotted-wing drosophila
		Rhagionidae		Snipe fly
		Simuliidae		Black fly
		Syrphidae	<i>Eupeodes lapponica</i>	Flower fly
			<i>Eupeodes volucris</i>	Flower fly
			<i>Scaeva pyrastris</i>	Flower fly
		Tipulidae	<i>Tipula oleracea</i>	Crane fly
	Ephemeroptera	Heptageniidae		Mayfly
		Baetidae		Mayfly
		Leptophlebiidae		Mayfly
		Ameletidae		Mayfly
	Hemiptera	Lygaeidae	<i>Plinthisus brevipennis</i>	Seed bug
		Pentatomidae	<i>Cosmopepla conspiciaris</i>	Stink bug
			<i>Zicrona caeruleus</i>	Stink bug
		Acanthosomatidae	<i>Elasmotethus cruciatus</i>	Red-cross shield Bug
		Rhopalidae	<i>Boisea rubrolineatus</i>	Western boxelder bug
	Homoptera	Aphididae	<i>Rhopalosiphum enigmae</i>	Aphid
		Cercopidae	<i>Philaenus spumarius</i>	Spittle bug
		Psyllidae	<i>Arytaina genistae</i>	Jumping plantlouse
	Hymenoptera	Apidae	<i>Apis mellifera</i>	European honey bee
			<i>Bombus fervidus californicus</i>	Bumblebee
			<i>Bombus melanopygus</i>	Bumblebee
			<i>Bombus mixtus</i>	Bumblebee
			<i>Bombus ternarius</i>	Bumblebee
		Cimicidae	<i>Zaraea sp. (inflata OR americana)</i>	Sawfly
		Formicidae	<i>Camponotus modoc</i>	Modoc carpenter ant
			<i>Formica obscuripes</i>	Ant
			<i>Formica pacifica</i>	Ant
			<i>Lasius niger</i>	Ant



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			<i>Lasius pallitarsis</i>	Ant	
			<i>Leptothorax muscorum</i>	Ant	
			<i>Stenamma diecki</i>	Ant	
			<i>Tapinoma sessile</i>	Odorous house ant	
			<i>Temnothorax rudis</i>	Ant	
			<i>Tetramorium caespitum</i>	Pavement ant	
		Tenthredinidae	<i>Monsoma pulveratum</i>	Sawfly	
			<i>Empria</i> sp.	Sawfly	
			<i>Lycaota</i> sp.	Sawfly	
	Lepidoptera	Arctiidae	<i>Arctia caja</i>	Great tiger moth	
			<i>Clemensia albata</i>	Little white lichen moth	
			<i>Pyrrharctia isabella</i>	Isabella tiger moth/banded woolly bear	
			<i>Spilosoma virginica</i>	Viginia tiger moth/yellow woolly bear	
			<i>Tyria jacobaeae</i>	Cinnabar moth	
		Blastobasidae	<i>Blastobasidae</i> sp. A		
		Cossidae	<i>Prionoxystus robiniae</i>	Carpenterworm	
		Crambidae	<i>Herpetogramma pertextalis</i>	Bold-feathered grass moth	
		Gelechiidae	<i>Chionodes mediofuscella</i>		
			<i>Gelechiidae</i> sp.		
			<i>Recurvaria nanella</i>		
			<i>Sorhagenia nimbosa</i>	Cascara moth	
		Geometridae	<i>Anticlea vasiculata</i>	Geometer moth	
			<i>Aplacera plagiata</i>	Geometer moth	
			<i>Apodrepanulatrix litaria</i>	Geometer moth	
			<i>Biston betularia</i>	Peppered moth	
			<i>Ceratodalia gueneata</i>	Geometer moth	
			<i>Coryphista meadii</i>	Geometer moth	
			<i>Costaconvexa centrostrigaria</i>	Geometer moth	
			<i>Diagrammia neptaria</i>	Geometer moth	
			<i>Dysstroma bruceata</i>	Geometer moth	
			<i>Dysstroma citrata</i>	Geometer moth	
			<i>Ecliptopera silaceata</i>	Geometer moth	

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			<i>Epirrhoe alternata</i>	Geometer moth
			<i>Eupithecia</i> sp.	Geometer moth
			<i>Geometridae</i> sp. A	Geometer moth
			<i>Geometridae</i> sp. B	Geometer moth
			<i>Hydriomena</i> sp.	Geometer moth
			<i>Idea dimidiata</i>	Geometer moth
			<i>Macaria dispuncta</i>	Geometer moth
			<i>Macaria signaria</i>	Geometer moth
			<i>Nealcis californiaria</i>	Geometer moth
			<i>Pero mizon</i>	Geometer moth
			<i>Plemyria georgii</i>	Geometer moth
			<i>Proitame matilda</i>	Geometer moth
			<i>Sabulodes aegrotata</i>	Omnivorous looper
			<i>Thalophaga taylorata</i>	Geometer moth
			<i>Trichodezia albivittata</i>	Geometer moth
			<i>Udea</i> sp. ( <i>rubigatus</i> or <i>profundulus</i> )	Geometer moth
			<i>Venusia pearsalli</i>	
			<i>Xanthorhoe defensoria</i>	
			<i>Xanthorhoe ferugatta</i>	
			<i>Xanthorhoe</i> sp. (probable <i>pontiarai</i> )	
			<i>Phylonorycter</i> sp.	
Gracillariidae			<i>Malacosoma disstria</i>	Forest tent caterpillar
Lasiocampidae			<i>Celastrina agriolus echo</i>	Spring azure
Lycaenidae			<i>Everes amyntula</i>	Western tailed blue
			<i>Orgyia antiqua</i>	Tussock moth
Lymantriidae			<i>Microlep a</i>	
Micro			<i>Microlep b</i>	
			<i>Abagrotis baurei</i>	Owlet moth
Noctuidae			<i>Adelphagrotis indeterminata</i>	Owlet moth
			<i>Adelphagrotis stellaris</i>	Owlet moth
			<i>Agrotis vancouverensis</i>	Owlet moth
			<i>Amphipyra pyramoides</i>	Owlet moth

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			<i>Androplia aedon</i>	Owlet moth
			<i>Apamea amputatrix</i>	Owlet moth
			<i>Apamea devastator</i>	Owlet moth
			<i>Apamea ophiogramma</i>	Owlet moth
			<i>Aseptis adnixa</i>	Owlet moth
			<i>Bomolocha abalienalis</i>	Owlet moth
			<i>Brachylomia rectifascia</i>	Owlet moth
			<i>Caenurgina crassiuscula/erechtea</i>	Owlet moth
			<i>Caradrina morpheus</i>	Owlet moth
			<i>Chytonix divesta</i>	Owlet moth
			<i>Cosmia praecuta</i>	Owlet moth
			<i>Diarsia esurialis</i>	Owlet moth
			<i>Diarsia rosaria</i>	Owlet moth
			<i>Dolicocuculia dentilinea</i>	Owlet moth
			<i>Egira rubrica</i>	Owlet moth
			<i>Egira</i> sp.	Owlet moth
			<i>Enargia infumata</i>	Owlet moth
			<i>Euxoa</i> sp.	Owlet moth
			<i>Graphiphora haruspica</i>	Owlet moth
			<i>Homorthodes communis</i>	Owlet moth
			<i>Ipimorpha veridipallida</i>	Owlet moth
			<i>Lacinipolia patalis</i>	Owlet moth
			<i>Lacinipolia</i> sp.	Owlet moth
			<i>Leucania farcta</i>	Owlet moth
			<i>Lithphana petulia</i>	Owlet moth
			<i>Mythimna oxygala</i>	Owlet moth
			<i>Neoligia exhausta?</i>	Owlet moth
			<i>Noctua comes</i>	Owlet moth
			<i>Noctua pronuba</i>	Owlet moth
			<i>Ochropleura implecta</i>	Owlet moth
			<i>Orthosia hibisci</i>	Owlet moth
			<i>Parabagrotis exertistigma</i>	Owlet moth

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			<i>Polychrysia</i> sp.	Owlet moth
			<i>Properigea albimacula</i>	Owlet moth
			<i>Protodeltote albidula</i>	Owlet moth
			<i>Proxenus minanda</i>	Owlet moth
			<i>Raphia frater</i>	Owlet moth
			<i>Xestia xanthographa</i>	Owlet moth
			<i>Zanclognatha</i> sp.	Owlet moth
			<i>Zosteropoda hirtipes</i>	Owlet moth
			<i>Gluphisia septentrionis</i>	Prominent moth
			<i>Gluphisia severa</i>	Prominent moth
			<i>Schizura unicornis</i>	Prominent moth
			<i>Polygonia satyrus</i>	Satyr comma butterfly
			<i>Agonopterix alstroemeriana</i>	
			<i>Batia lunaris</i>	
			<i>Decantha stonda</i>	
			<i>Hoffmanophila pseudospretella</i>	
			<i>Papilio</i> sp.	Swallow-tail butterfly
			<i>Pieris rapae</i>	Cabbage white
			<i>Pieris marginalis</i>	Margined white
			<i>Plutella xylostella</i>	Diamondback moth
			<i>Greya punctiferella</i>	
			<i>Acrobasis tricolorella</i>	Snout moth
			<i>Agriphila</i> sp.	Snout moth
			<i>Chalcoela iphitalis</i>	Snout moth
			<i>Chrysoteuchia topiaria</i>	Snout moth
			<i>Crambus cypridellus</i>	Snout moth
			<i>Crambus</i> sp.	Snout moth
			<i>Euchromius oscellus</i>	Snout moth
			<i>Euzophora semifuneralis/vinulella</i>	Snout moth
			<i>Euzophora vinulella</i> ?	Snout moth
			<i>Herpetogramma pertextalis</i>	Snout moth
			<i>Hypsopygia costalis</i>	Snout moth

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			<i>Perispasta caeculalis</i>	Snout moth
			<i>Phycitinae</i> sp.	Snout moth
			<i>Pyalidae</i> sp. A	Snout moth
			<i>Pyalidae</i> sp. B	Snout moth
			<i>Pyrausta californicalis</i> ?	Snout moth
			<i>Pyrausta subsequalis</i>	Snout moth
			<i>Scoparia</i> sp.	Snout moth
			<i>Synclita oblitalis</i>	Snout moth
			<i>Udea profundalis</i>	Snout moth
			<i>Udea washingtonalis</i>	Snout moth
			<i>Udonia</i> sp.	Snout moth
	Symmocidae		<i>Oegoconia quaripuncta</i>	
	Thyatiridae		<i>Pseudothyatira cymatophoroides</i>	
	Tineidae		<i>Tineidae</i> sp.	
	Tortricidae		<i>Archips argyrosipilus</i>	Tortrix moth
			<i>Archips rosanus</i>	Tortrix moth
			<i>Argyrotaenia citrana</i>	Tortrix moth
			<i>Argyrotaenia franciscana (complex)</i>	Tortrix moth
			<i>Choristoneura rosaceana</i>	Tortrix moth
			<i>Clepsis consimilana</i>	Tortrix moth
			<i>Clepsis</i> sp.	Tortrix moth
			<i>Ditula angustiorana</i>	Tortrix moth
			<i>Eana</i> sp. ?	Tortrix moth
			<i>Epinotia</i> sp. ( <i>solicitona</i> OR <i>momonana</i> )	Tortrix moth
			<i>Grapholita populana</i>	Tortrix moth
			<i>Olethreutes</i> sp.	Tortrix moth
			<i>Proteoteras aesculana</i>	Tortrix moth
			<i>Tortricidae</i> sp. A	Tortrix moth
			<i>Tortricidae</i> sp. B	Tortrix moth
	Yponomeutidae		<i>Zelleria</i> sp.	Moth
Neuroptera	Chrysopidae		<i>Chrysopa</i> sp.	Green lacewing
Odonata	Aeshnidae		<i>Anax junius</i>	Green darner

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		Coenagrionidae	<i>Enallagma carunculatum</i>	Tule bluet damselfly
		Libellulidae	<i>Libellula forensis</i>	Eight-spotted skimmer
	Orthoptera	Acrididae	<i>Melanoplus femurrubrum</i>	Red-legged grasshopper
		Myrmecophilidae		Ant cricket
	Plecoptera	Perlodidae		Stonefly
		Perlidae		Common stonefly
		Nemouridae		Spring stonefly
		Chloroperlidae		Green stonefly
		Leuctridae		Rolled-wing stonefly
	Psocoptera			Booklouse, barklouse or barkfly
	Raphidioptera	Raphidiidae	<i>Agulla</i> sp.	Snakefly
	Thysanoptera	Thripidae	<i>Chirothrips aculeatus</i>	Thrips
			<i>Ewartithrips ehrhornii</i>	Thrips
			<i>Franliniella occidentalis</i>	Western flower thrips
			<i>Rhipidothrips brunneus</i>	Thrips
	Trichoptera	Rhyacophilidae		Primitive caddisfly
		Limnephilidae		Northern caddisfly
		Hydropsychidae		Net-spinner caddisfly
		Glossosomatidae		Saddle-case caddisfly
Malacostraca	Amphipoda	Gammaridae		Amphipod
	Decapoda	Astacidae		Crayfish
	Isopoda	Armadillidiidae	<i>Armadillidium vulgare</i>	Common pill-bug
		Oniscidae	<i>Oniscus asellus</i>	Common woodlouse

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**Table 12.** Research items that would increase understanding of Forest Park wildlife. This is not a list of prescriptives to accomplish prior to implementing management actions.

Category	Gap/focal taxa	Gap type	Special status concern?	Questions	Next steps	Methodological sample	Citizen science opportunity	Effort
Mammals	Monitoring: mammalian population trends	Population dynamics	Yes	We have no information on trends in mammals and no studies are currently underway to address this. Are common mammalian species declining in abundance as is the case with many common birds?	Monitor populations of mammalian wildlife in all combinations of habitat type (shrub, grass, riparian, upland, edge and interior forest) using methods that appropriate for each taxonomic group.	(1) Trap for small mammals using arrays of baited Sherman traps; (2) survey for ungulates, carnivores, and large rodents using baited motion-detection cameras, track plates, and Havahart traps; (3) survey for bats using acoustic detectors and mist netting; and (4) survey for fossorial mammals (moles, pocket gophers, mountain beaver, ground squirrels) by quantifying species-specific burrows per unit area.	Yes	L
	Bats: diversity and habitat use	Relative abundance	Yes	Are any bat species abundant or rare in the park? In which seasons are which species present?	Survey for bats in all management units and habitat types over the course of one full year.	Conduct acoustic surveys throughout the park in all seasons and resolve acoustic data to species. Conduct mist-netting surveys where feasible to increase species level information.	Yes	L
		Breeding		Do any bat species breed in the park?	Survey for bats in all management units and habitat types over the course of one full year.			
		Habitat use		Are late successional coniferous forest patches important for park bats? Grand fir? Broken top trees? Thurman bridge?	Survey for bats in all management units and habitat types over the course of one full year. Explore known bat-preferred habitat structures for use by bats.			
		Distribution		Are bats well distributed in the park, or restricted to a few key sites or colonial roosts?	Survey for bats in all management units and habitat types over the course of one full year.			

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			Which invertebrates are especially important for park bats?	Analyze bat dietary composition	Capture bats in mist nets, disgorge stomach contents, release bats otherwise unharmed, and analyze stomach contents to the lowest possible taxonomic level.	
	<b>Foxes: mammalian carnivore diversity</b>	Diversity	Have foxes been eliminated from the park, perhaps due to the expansion and abundance of coyotes?	Research the presence/absence of foxes in regional habitat and survey for the presence of foxes in the park.	Survey for foxes in the park using motion-detection cameras and track plates for one full year. Research the presence/absence of foxes in the region through discussions with regional wildlife experts and experts on fox ecology, and by reading the scientific wildlife literature relevant for this region.	M
	<b>Ground squirrels and pocket gophers: meso-rodent diversity</b>	Diversity	Do pocket gophers occur in FP, perhaps in grassy trailheads or near water towers? Do California ground squirrels occur in FP?	Survey for ground squirrels and pocket gophers within and near the perimeter of park.	Survey for the conspicuous, species-specific burrows of pocket gophers and ground squirrels in relatively open, grassy habitat near the park perimeter, in meadows, and around water towers.	S
	<b>Elk: movements of the largest park inhabitant</b>	Habitat use	Do elk have a migration pattern with respect to their occurrence in the park?	Survey for elk for one full year, especially at the park perimeter and forest interior sites.	Various options are possible. (1) Rely on scats and tracks to estimate the presence, number, sex, age class, and habitat use of elk in the park. (2) Use an array of motion-detection cameras to estimate the same. (3) Capture, radio-collar, and track elk in and around the park to best estimate movements and demographics.	M/ L
			What areas of the park are being used by elk and in what seasons?			
			Do elk enter the park after fall breeding? How long do they stay?			
			How many elk inhabit the park each year? Each season?			
			Where do park elk go to breed? Is the park used for calving?			

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	<b>Woodrats and voles: Small-rodent diversity</b>	Diversity	Yes	Do long-tailed, white-footed or western red-backed voles occur in FP?	Survey for voles in heretofore unsurveyed habitat types including shrub, perennial riparian, and grass habitats.	Survey for voles using an array of Sherman traps in shrub, grass, and riparian habitats. For white-footed voles, survey in mature, riparian alder stands with abundant beaked hazel shrub.	M
		Reintroduction		North American woodrats and tree voles are not closely related to their Old World cousins, and these species are valuable ecosystem components. These rodents readily breed in captivity. Could they be successfully reintroduced into the park?	Outline the feasibility of reintroducing red tree voles and woodrats to the park in the form of a SWOT analysis (strengths, weaknesses, opportunities, threats). Discuss the outline with known stakeholders including the Oregon Zoo, USFWS, USFS, OSU, park perimeter residents, Metro, West Multnomah Soil & Water Conservation District, and others.	The Oregon Zoo could offer a potential breeding facility for rapidly generating an introductory population. The USFS might provide funding, and OSU could generate graduate student interest for monitoring the reintroduction of a federal candidate species (red tree vole). The project also lends itself to citizen science for nest monitoring and arboreal surveys (tree-climbing).	M
	<b>Porcupine: abundance trends for this rare, large rodent</b>	Diversity		The park seems to have adequate habitat to support porcupine, but they are nevertheless rare and sign of them is essentially absent. Are we on the verge of forever losing the porcupine from the park?	Perform systematic surveys for porcupine sign in the park. Determine the porcupine's range limit in the Tualatin Valley and Tualatin Mountains.	Search for porcupine sign (chews, tracks, scats) in the park. Use motion-detection cameras and track-plates to locate porcupines. Research the regional range limit of porcupines.	S
	<b>Small "Pacific" rarities</b>	Diversity		Are Pacific water shrew and Pacific jumping mouse truly rare in the park? Are they still present?	Survey in perennial riparian and upland areas for these small mammals.	Review the scientific literature to determine the best methods for locating these two rare species.	S
<b>Birds</b>	<b>Monitoring: avian population trends beyond the southern boundary</b>	Population dynamics	Yes	We have excellent information about population trends at the southern urban boundary of the park, and that citizen science effort is ongoing. BES has started a new project that will sample the abundance of common species at sites in other	Survey for avian species along transects in the north and central management units.	Conduct transect surveys in all seasons, similar to those done by Gross at Pittock Mansion, and produce a basis for comparison of population trends among both breeding and non-breeding avian species throughout the park.	L

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					management units on a rotating schedule that will require many years to discern annual population trends there. What's going in the central or northern management units where the habitat is less urban and habitat connectivity is better?					
	<b>Avian population decline research</b>	Population dynamics	Yes	Yes	Approximately one-third of the park's bird species show evidence of decline. The source of these declines may be regional, statewide, or continental in scale, or a combination of these.	For each species, examine the scientific literature and citizen science reports to determine whether its decline has been noted elsewhere, and whether the reasons for its decline are well understood or not.	Conduct transect surveys in all seasons, as done by Gross at Pittock Mansion, and produce a basis for comparison of population trends among breeding and non-breeding avian species in other areas of the park.	Yes	L	
	<b>Common special-status breeders: population dynamics</b>	Population dynamics	Yes	Yes	To what extent are common TEES Special Status birds breeding successfully in the park? These include band-tailed pigeon, pileated and downy woodpeckers, red-breasted sapsucker, brown creeper, black-throated gray warbler. Do park populations represent a source or sink for any of these species?	Conduct avian ecology research into the breeding success of each of these species in the park.	Conduct species-specific breeding biology studies into common special-status birds, including nest-finding, and measure annual rates of nest success, timing of breeding, reproductive output, etc.	Yes	M	
	<b>Uncommon special-status breeders: population dynamics</b>	Population dynamics	Yes	Yes	To what extent are uncommon TEES Special Status birds breeding successfully in the park? What is the density and distribution of western wood-pewees, olive-sided and Hammond's flycatchers, varied thrush,	Conduct avian ecology research into the breeding success of each of these species in the park.	Conduct species-specific breeding biology studies into rare special status birds, including nest-finding, and measure annual rates of nest success, timing of breeding, reproductive output, etc.	Yes	M	

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					and Hutton's vireo? Do park populations represent a source or sink for any of these species?							
					Why were landfowl lost from the park and could they be reintroduced? What are the regional population boundaries for these species? Is a local or regional reintroduction feasible? Unlike small rodents, landfowl have large home ranges and are likely to require a broader regional population to sustain a population in the park.							

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	<b>Rough-skinned newts: breeding location of the population in the North Mgmt. Unit</b>	Breeding	Rough-skinned newts migrate to the Audubon Sanctuary pond to breed in the South Mgmt. Unit. But where do rough-skinned newts go to breed in the north and central units? Are they breeding in the park or on private lands? Should we provide them with ponds inside the park boundary?	Locate and map known pond-breeding sites. Investigate the possibility of additional pond breeding sites in the private ornamental and stock ponds of residents at the park perimeter. Create a plan for preserving access to known breeding sites, or create new breeding sites within the park preserve.	Identify potential amphibian breeding ponds by conducting remote aerial surveys using Google Maps and Google Earth. Ask park perimeter residents about amphibian breeding in their private ponds. Confirm amphibian breeding at identified and accessible sites. Create a plan to protect current breeding habitat access or build new breeding sites within the park preserve.	Yes	M/L
	<b>NW salamander occurrence</b>	Diversity	Do northwestern salamanders occur in the park? If so, where are they breeding?	Conduct targeted surveys for northwestern salamanders and for breeding sites.	Review the literature to determine the best methods for locating this difficult to detect species.	Yes	S
	<b>Monitoring: herpetile population trends</b>	Population dynamics	The amphibian monitoring project has done a good job of documenting diversity and abundance of salamanders at one site in the park in recent years. We need a long-term monitoring project, perhaps a citizen science one, that samples additional sites to track population trends.	Review the scientific literature and local citizen science efforts and create a monitoring plan for salamanders and frogs in the park.	Review the scientific literature and local citizen science efforts and create a monitoring plan for salamanders and frogs in the park.	Yes	M
	<b>Mollusks</b>						
	<b>Snail and slug diversity beyond the southern park boundary</b>	Diversity	Nathan Hodges conducted an excellent survey near the southern park boundary that contributed greatly to our knowledge of terrestrial mollusks. But what's going on in other parts of the park?	Survey for mollusk diversity and relative abundance in the central and north management units.	Conduct terrestrial hand-search methods similar to those used by Hodges to record mollusk diversity and relative abundance.	Yes	S
	<b>European red slug: impacts of a recent non-native invader</b>	Non-native impacts	When Hodges conducted his study in 2005, European red slugs were rare. They are now widespread and abundant. Are they merely an addition to the local	Survey for mollusk diversity and relative abundance in the park and explore the relative abundance of native species vs. the European red slug. Examine red slug ecology in	Create a plan for the management of red slugs in the park based on the available information and site specific research into the ecology of this species.	Yes	S

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				fauna or are they having impacts on native species abundance? Will anything, such as coastal giant salamanders or barred owls, eat red slugs to control their population?	the park. Analyze the benefits and risks of reducing or eliminating red slugs in the park.			
Arthropods	Arthropod diversity	Diversity	Yes	What is arthropod diversity to the correct order of magnitude? 100s? 1,000s? 10,000s? We lack basic information on diversity.	Survey for arthropods with a focus on documenting diversity.	Conduct annual surveys in all habitats in the park for insects and other taxa using the wide array of methods commonly employed by entomologists (sweep nets, pitfall traps, terrestrial hand searches, bug lights, sheets, funnel traps, etc.). Partner with ODA, USDA, PSU, and others to create a reference collection for the park. Engage regional entomologists in a citizen science effort to document the diversity of arthropods in the park.	Yes	L
	Dominant arthropods	Ecology		Which arthropod species are especially abundant (an ecological “dominant,” like a deer mouse relative to other small mammals), and perhaps a primary food source for bats, woodpeckers, warblers, or shrews? How are the great many species of arthropods interacting with the habitat and each other?	Survey for arthropods with a focus on documenting the relative abundance of species of interest, and on forest ecology. Conduct in-depth research into the ecology of dominant (highly abundant) arthropod species, if any occur, to best understand their roles as an indicator species of forest health, and their ecological value (as food, ecosystem engineers, etc.) to other species.	See Arthropod Diversity. Review literature and conduct in-depth research in the park into the ecology of dominant (highly abundant) arthropod species, if any occur, to best understand their roles in forest ecology, especially their ecological value (as food, ecosystem engineers, etc) to other animal species.	Yes	M
	Non-native vs. native Insects	Non-native impacts		How many non-native arthropods are on the landscape now? Are they outcompeting closely related native invertebrates?	Monitor populations of arthropods for changes in the relative abundance of native and non-native species.	See Arthropod Diversity and Dominant Arthropods.	Yes	M

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<b>Beetles, moths, and trees</b>	Ecology		Do any beetles or moths currently in the inventory for the park pose an immediate threat to forest health, especially live trees?	Identify potential pest insects in the current species inventory, monitor ODA and USDA surveys to identify new threats to trees, and monitor the forest for diseased trees.	Monitor the annual results of ODA and USDA surveys. Conduct annual surveys for diseased trees as part of non-native plant controls.	Yes	M
<b>Monitoring: Population trends of insects and other arthropods</b>	Population dynamics	Y	Though moth and beetle diversity has been monitored along the eastern park boundary for many years, data on population trends of arthropod species are utterly lacking, even for common species, and also for known threats to forest health.	Monitor populations of arthropods for changes in the relative abundance of native and non-native species.	See previous arthropod strategies. Conduct annual surveys for insects and other arthropods, by expanding current surveys beyond their focus on beetle and moth pests.	Yes	L
<b>Wildlife response</b>	Wildlife response	Yes	Are habitat restoration actions increasing the diversity and/or abundance of rare or special status species?	Conduct pre- and post-treatment experiments where habitat restoration activities are scheduled and implemented. Survey for indicator species (e.g., breeding and migratory birds, amphibians) to determine whether habitat restoration efforts are having the desired effect.	Conduct site-specific and taxa-specific surveys (avian point counts, amphibian surveys, etc.) before and after actions to restore habitat.	Yes	M
<b>Wildlife response to utility corridor mgmt.</b>	Wildlife response	Yes	Are development, utility corridor maintenance, or other anthropogenic impacts effecting wildlife occurrence, especially for uncommon species or large terrestrial ones?	Conduct pre- and post-treatment experiments where utility corridor maintenance activities are scheduled and implemented. Survey for indicator species (e.g., breeding and migratory birds, amphibians, pollinators) to determine whether and how habitat alteration is affecting wildlife diversity and abundance.	Conduct site-specific and taxa-specific surveys (avian point counts, amphibian surveys, etc.) before and after actions that adversely affect habitat.	Yes	M

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	<b>Wildlife response to park users and domestic dogs</b>	Wildlife response	Yes	Do any wildlife species in the park, especially large mammals and birds, show a strong preference for trail-less areas? Are wildlife more or less abundant near trails? Which species? Do dogs, on or off-leash, have a detectable impact on park wildlife?	Research and design scientific experiments that appropriately test for the lethal and non-lethal effects of park visitors and dogs on the diversity, abundance, and behavior of wildlife species of interest. Conduct experiments on the impact of legal park users and dogs along trail transects.	Review the scientific literature for the best available information on user and dog impacts on wildlife, and write a report on findings applicable to Forest Park. Conduct site-specific and taxa-specific experiments to test whether changes to wildlife behavior (non-lethal) and on lethal impacts are correlated with dogs, either on or off leash. Use off-trail areas in the central and north management units as controls, especially Linnton Park and the Newton Creek areas.	Yes	M
	<b>Wildlife response to trail system expansion</b>	Wildlife response	Yes	Do trail-less and trailed areas of the park support the same diversity and abundance of wildlife?	Conduct a comparative analysis of vertebrate wildlife diversity, abundance, and breeding rates at sites near and far from trails.	Review the scientific literature for the best available information on user and trail impacts on wildlife, and write a report on findings applicable to Forest Park. Conduct site-specific and taxa-specific experiments to test whether changes to wildlife diversity, abundance and breeding success are correlated with trails and park user impacts. Use off-trail areas in the central and north management units as controls, especially Linnton Park and the Newton Creek areas.	Yes	M
	<b>Wildlife response to illegal park activities</b>	Wildlife response	Yes	Are illegal park activities such as homeless camps, rogue trail construction and nocturnal cycling on trails having negative impacts on wildlife?	Design a study to test for the effects of homeless camps, rogue trail construction and use, and nocturnal cycling on wildlife.	Similar to previous two strategies.	Yes	M
<b>Wildlife habitat assessment</b>	<b>Snag abundance</b>	Habitat	Yes	What is the relative abundance, size, species, condition, height, etc. of snags throughout the park? Evidence of wildlife use?	Quantify the type, number, size, and condition of snags at randomly selected sites in all management units, and the use of snags by wildlife, especially woodpecker nest cavities. If some park areas are depauperate, write a plan for increasing snag abundance by judiciously "snagging" selected live trees.	Quantify the number, size, species, condition, and wildlife use of snags at randomly selected sites throughout the park and in various habitat types (forest edge, forest interior). Measure the annual rate of change in snag abundance.	Yes	S/ M

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	<b>Coarse Woody Habitat volume</b>	Habitat	Yes	What is the volume of coarse woody debris (CWD) in upland and riparian areas throughout the park, especially near major streams?	Quantify the volume of CWD in major streams and upland sites. Quantify the annual natural change in CWD over 5 years. If certain streams are below threshold values (see ODFW reports), judiciously select trees for felling to increase CWD in upland or riparian areas as necessary	Quantify the volume of CWD in each major stream and at randomly selected upland sites. Measure the annual rate of natural change in CWD over 5 years.	Yes	M
	<b>Regional foraging and breeding habitat beyond the park boundary for wide-ranging species of interest</b>	Habitat	Yes	Band-tailed pigeons, Vaux's swifts, northern red-legged frogs, grouse, and elk are a few of the species of interest that are known to forage and/or breed beyond the park boundary while also using the park in some seasons. An understanding of exactly which habitats are key to maintaining these and other species of interest in the park is necessary to maintain park populations.	Research the use of habitat beyond the park boundary by rare and special-status park wildlife by working with public and private landholders and regional wildlife experts. Document the sites used by regional elk herds, band-tailed pigeon flocks, breeding northern red-legged frogs, breeding grouse, and other species of interest.			M
	<b>Quantitative data on shrubs and ground cover</b>	Habitat		For instance, what is the relative abundance of shrubs in the north, central and south mgmt units? A great number of questions could be supported by having quantitative habitat data.	Quantify and compare the percent cover of shrubs and herbaceous ground plants at randomly selected sites in all management units to better understand the distribution of these important habitat components, and inform habitat restoration activities.	Use quadrats to quantitatively assess shrub and groundcover density at randomly selected sites.	Yes	S
	<b>Soil and forest floor profiles</b>	Habitat		What is the profile of park soils and leaf litter? Are the soils wildlife friendly for aplodontia, gophers, moles, leaf litter shredders, burrowing mesopredators, and forest-floor birds?	Study park soils and document the wildlife therein, especially arthropods.	Review the scientific literature for the best methods to sample and document soil profiles.	Yes	S

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## Appendix B: Tables

	<b>Special-status habitats</b>	Habitat	Yes	Are any rare or undocumented species using special-status habitats such as <i>Oaks</i> or <i>Forested Wetlands</i> ? Only cursory habitat assessments have been done in oak stands.	Search off-trail areas for forested wetlands, oak remnants, and other special habitats and record their location, size, type, wildlife value, and current wildlife use.	Explore low-lying off-trail areas and the Highway 30 perimeter for wetlands, ponds, hydrophilic vegetation, and oak remnants.	Yes	S
Wildlife recolonization	<b>Wildlife recolonization and re-introduction</b>	Reintroduction	Yes	If we build great habitat, is it likely that some historical wildlife will nevertheless never return? Would a few historical, special-status small mammalian species (e.g., red tree vole, dusky-footed woodrat) improve park ecology and benefit from reintroduction to the park?	Estimate the regional range limits of the red tree vole, bushy-tailed woodrat, gray fox, sooty grouse, ruffed grouse, and other extirpated or rare species of interest. Estimate the probability of natural recolonization of the park by those species. Estimate the probability of maintaining populations of the species in the park, or in the park and surrounding landscape, if recolonization or reintroduction occurred. Define the ecological value and feasibility of reintroduction or extirpated or rare species that are good candidates for reintroduction, and are unlikely to successfully recolonize the park naturally.	See foxes, woodrats and voles, porcupines, small "Pacific" rarities, grouse and mountain quail, and red-legged frogs. Review the literature on recolonization and reintroduction and on the individual species to estimate the probability of maintaining rare species, the probability of natural recolonization, and the probability of reintroduction success.	Yes	L

Table 12

## Appendix C: Footnotes

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