

April 16, 2025



Intertwine Alliance opposition to PGE Harborton Reliability Project

Dear Portland City Council,

I'm writing to express The Intertwine Alliance's opposition to the PGE Harborton Reliability Project. We support the appeals of Forest Park Conservancy and the Forest Park Neighborhood Association, and ask you to reject the hearing officer's decision approving PGE's proposal. Please direct the city attorney to write a decision based on City staff's recommendations to oppose the project.

The Intertwine Alliance is a Portland-Vancouver regional coalition of 80 public, private and nonprofit 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 serve.

PGE's Harborton project conflicts with the the local law that manages this cherished public resource, the Forest Park Natural Resource Management Plan (NRMP). We don't believe that the damage done to Forest Park through PGE's expansion *can* be sufficiently mitigated. The project also sets a dangerous precedent for future phases of expansion in the park.

Top among our reasons for opposing the plan:

1. 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. The project undermines the goal of growing and protecting a self-sustaining forest.
2. There are non-Forest Park alternatives for locating the project. It is possible to update PGE's 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 this project sets 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.

We want to acknowledge that the transition to clean energy is a slow and expensive one, with real financial impacts on PGE and therefore its customers. We are concerned that these impacts are shared inequitably by ratepayers. We are also concerned about slowing down mandates to meet clean energy mandates, and the risks of power outages and wildfire. Still, in the face of all these very real challenges and considerations, we do not believe PGE's solution is an acceptable one. We urge consideration of other solutions to ensure that those most impacted by the effects of climate change are not also disproportionately burdened by clean energy transition — such as data centers paying their fair share of new infrastructure demands.

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. We implore this Council to avoid setting a precedent of siding with a profit-seeking corporation over the expertise of City staff. Instead, please vote to protect the public good of Forest Park, support the appeal, and deny PGE's proposal.

Thank you for consideration.

Tara Wilkinson, Director
The Intertwine Alliance

