July 30, 2019

City of Springfield
Development and Public Works Department
225 Fifth Street
Springfield, Oregon 97477

Attn: Springfield Planning Commission (Chair Mike Koivula, Vice Chair Troy Sherwood, and Members Tim Vohs, Andrew Landen, Grace Bergen, Kuri Gill and Sophie McGinley) and Lane County Hearings Official (Anne Davies)

Re: Appeal of a Director's Decision (Case # 811-19-000129-TYP3)
In Regards to Approval of Site Plan review (Case # 811-19-000084-TYP2)
For the Springfield Utility Board's Glenwood Substation and Transmission Line
Information to be Included in the Record during the Post-Hearing Open Record Period

Dear Planning Commission Chair Koivula, Vice Chair Sherwood, Members Vohs, Landen, Bergen, Gill and McGinley and Hearings Official Davies,

Springfield Utility Board (SUB) hereby submits the following information and requests that it be included in the record for the above named case (Appeal Case # 811-19-000129-TYP3 regarding Site Plan Review Case # 811-19-000084-TYP2).

Responses to Questions Raised at the July 16, 2019 Public Hearing
NOTE: SUB is voluntarily submitting the following information to be placed in the record for the aforementioned case as a way to demonstrate due consideration of Planning Commission and Hearings Official questions, though much of the inquiry and the provided information is not actually applicable the criteria of approval. SUB requests that this be kept in mind as deliberations are carried out and decisions are rendered.

1. PCBs.
The U.S. Environmental Protection Agency banned the use of PCBs in new electrical equipment in 1979. SUB's Glenwood facilities therefore will not contain PCBs.

2. Ground Disturbance Related to Transmission Line Pole Installation.
Transmission line poles will be transported and installed in their specific locations during dry weather when ground is hard. There will be 20 total poles along the transmission line. Six are to be installed near the existing transmission line infrastructure on Tax Lot 300. There the ground has long been an area of transmission line traffic. The next two poles will be installed next to the end of the access road. The next six poles will be installed at regular intervals along the new transmission line corridor. There are two poles with their anchors to be installed on Tax Lot 1100. The final four poles will be installed on Tax Lot 101 next to the substation compound. None of these pole locations are on steep slopes. Again, these are direct-embed monopoles. The pole locations and access road therefore minimizes ground disturbance associated with construction and maintenance of the poles.

3. Additional Tree Planting and Native Shrub Planting.
The Site Plan Review decision included findings that the application's Vegetation and Re-Vegetation Plan meets applicable criteria. As the proposal states, and staff confirms, the re-vegetation plan includes native tree installation on the west and north sides of the substation compound, the retention of existing trees east of the compound, planting of appropriate vegetation associated with the stormwater facilities and the seeding and establishment of native drought-tolerant grasses in areas where the ground surface has been disturbed. (And, actually, this will improve the area over existing conditions given disturbance by dirt bikes, unpermitted earthmoving, etc.)

4. Stormwater Level Spreaders Pointing Toward the Access Road.
   The proposed stormwater level spreaders are located to direct stormwater runoff away from the access road, in the direction of gently sloping ground.

5. Integrated Vegetation Management.
   SUB has a vegetation management program for its transmission line facilities. Titled *Transmission Vegetation Management Program* (TVMP), the program applies to all SUB overhead transmission lines regardless of location or line voltage. It addresses responsibilities, program practices, annual activities, service outage reporting and documentation of activities. For larger transmission line infrastructure, such as the proposal here, Bonneville Power Administration vegetation management practices are representative of SUB's practices. A copy of that program has been previously submitted but is included again here for convenience. (See SUB Transmission Vegetation Management Program 10-31-16, BPA DOE Vegetation Management Program 12-29-16 and BPA Keeping the Way Clear for Safe Reliable Service 7-2016.)

6. Short Term and Long Term Purpose(s) of the Access Road.
   The access road will serve several purposes. First, the road allows SUB to haul trees cut for transmission line construction. This minimizes ground disturbance associated with tree felling because the trees will be hauled along the road instead of across the ground surface. Second, as described in #2 above, the road facilitates access for transmission pole construction, further reducing ground disturbance. Finally, the road will provide for long term access for general operations, maintenance and the occasional repair.

   In regards to the location of the access road, the road design and location is such to avoid disturbing and driving on steep hill sides within the transmission line corridor. It is common practice to have multiple access points to a pole line due the fact that only poles need truck access. Lines between the poles do not need access.

7. Ground Disturbance Related to Tree Felling Activity.
   Again, trees may be felled but stumps and roots will not be excavated. There will be no excavation. Tree trunks will be cut at ground level. Once felled, as described above, trees will be removed from the site by way of the access road. Access from the tree felling activity to the access road is close to those two points described above – at the west end and the southeast end of the transmission line. Ground disturbance will be limited to logging contractor equipment following accepted logging practices. As documented in the Tree Felling Permit application, staff findings and decision, the proposed tree felling will follow State of Oregon *Forest Practices Act* guidelines. Although already on the record for this Site Plan Review case, for convenience a copy of the Tree Felling Permit staff report and decision is included herein. (See Tree Felling Decision herein.)

8. Access along the Transmission Line Corridor over Time.
   Access along the transmission line is expected to be infrequent. For annual inspections and damage assessments, SUB uses small 4-wheel drive vehicles, ATVs or goes by foot.

9. Property Line Adjustment.
   The Property Line Adjustment addressing Tax Lots 1100 and 3701 was recorded with the Lane County Surveyor's Office on July 11, 2019 as C.S. FILE No. 44759. A copy is included herein. (See CSF 44759 PLA SURVEY FOR SUB 071119.)

10. Use of ODOT I-5 Right-Of-Way.
As previously explained, SUB contacted ODOT inquiring whether the transmission line infrastructure could be located in ODOT right-of-way. ODOT replied that it would not allow SUB to locate its transmission line in the I-5 right of way. ODOT provided several reasons for this, including a reference to OAR 734-055-0080. This rule provides that facilities in a freeway right of way are generally limited to perpendicular crossings of the freeway only, and that longitudinal facilities are only allowed in cases of "extreme hardship." ODOT concluded that SUB did not meet the criteria for an extreme hardship. A copy of this email was submitted into the record on July 9, but for convenience it is included again herein. (See ODOT ROW Use Not Allowed 9-10-18.)

11. Future Plans for ODOT Right-Of-Way.
The appellant testified at the July 16 hearing and provided a technical memorandum from a consulting engineer, that plans to widen this segment of I-5 were not found during a review of the State Transportation Improvement Project (STIP) and the Interchange Area Management Plan (IAMP). Nonetheless, in the same email referenced above regarding the prohibition on locating longitudinal facilities within ODOT right-of-way, ODOT stated that ODOT has plans to add an additional northbound lane from the 30th Avenue onramp to Glenwood Boulevard. Regardless of the status of the widening project, Appellants' evidence about the status of ODOT's freeway widening plan is irrelevant because ODOT's email is clear that ODOT will not allow the transmission line in the right of way. (See ODOT ROW Use Not Allowed 9-10-18.)

12. Crash History along this Segment of I-5.
Verbal testimony at the July 16 hearing was made referencing crash history in the vicinity of the proposed substation on Tax Lot 101. In response, Springfield Utility Board is entering into the record an email chain from April 2017 wherein SUB inquired of ODOT as to I-5 crash history adjacent to the substation tax lot. In response, ODOT stated:

> *"…a quick listing of DMV reported crashes for the section from MP 191.40-191.60 for the period from 1/1/2006-12/31/2015 … found that there were a total of 3 reported incidents (4 crashes total) during that time. One was fixed object into the guardrail at MP 191.40, one was a side-swipe overtaking and the third was rear-end into a parked car that left road debris causing another 2nd crash in avoidance. This area does not have a reported issue with roadway departure crashes."*

ODOT also stated:

> *"…did not recall this area was a high crash area. Rather, incidents in this area, seemed to occur in the South Bound Lanes, on the opposite side of the highway, from the site identified by SUB."*

(See ODOT Crash History 4-2017.)

13. Photosimulations of Transmission Line.
Appellant testimony at the July 16 hearing included entering into the record a series of photosimulations that the appellant had previously entered into the record for the Tree Felling Permit appeal (Case # 811-19-000102-TYP3). In response, SUB is entering into the record for this case the following:

    1. The appellant submitted a series of photographs that have a series of poles and wires superimposed over the site. These are not accurate for the following reasons:

a. The appellant did not use actual, digital, geo-referenced pole locations and line height above ground as the applicant did.
b. The actual lines installed will not be red (or blue or green or any other color than finished aluminum). The poles appear to be floating not following the profile we have designed.
c. Trees were digitally removed from the photograph without the use of digital accuracy of the applicant's plans as the applicant did.
d. They have excessively cleared trees. Trees to remain between the transmission line and I-5 were erroneously removed. Trees on I-5 property were removed, when in fact, large stands of trees will remain.

2. The appellant submitted the photosimulations but did not provide any information regarding the methodology used in generating the simulations.
   a. Indeed, the appellant could not have used any methodology with any degree of accuracy. It does not have the transmission line design engineer's original digital files.

3. SUB had also entered into the record for the Tree Felling Permit appeal a photosimulation of the proposed transmission line superimposed on the site. Whereas the appellant generated their simulations without original digital files, SUB did provide an accurate photosimulation. SUB's methodology included:
   a. An original PLS-CADD[1] digital file of the proposed transmission line poles and conductors model.
   b. An original KMZ digital file of the model exported from PLS-CADD.
   c. Accurately merged the PLS-CADD file and the KMZ file.
   d. Georeferenced this file into a Google Earth #D photograph of the transmission line site.
   e. The result is a to-scale, accurate horizontally and vertically, photosimulation of the transmission pole and lines in their planned location.

   (See Google Aerial with SUB Overlay 6-18-19.)

14. Transmission Line Location on a Hillside.
Some of the transmission line portion of the project site contains grades15% or greater. But not all of the site is at 15% or greater. Some of the site is has area with very shallow grades. In this regard, the transmission wires may cross a hillside but the construction will not impact the hillside. Indeed, there is very little physical connection between the transmission line infrastructure and the hillside itself. Only where the poles are located will there be ground impact. Moreover, as noted elsewhere in this submittal and in other material on the record, these poles are monopoles which are augured directly into the ground resulting in very little hillside impact. (See Monopoles on a Hillside 100-foot Veg Mgmt and Monopoles on a Hillside 50-foot Veg Mgmt.)

15. Transmission Line located on the "Crest of a Hill."
As staff have said, the transmission line corridor is along a hillside. It is not on a hilltop nor is it a ridgeline. The existing slope of the hillside is the result of the development of Interstate 5 and is not a natural feature of the landscape. The roadbed for I-5 was cut into the northeast flank of a larger hill, known as Moon Mtn, whose hilltop and ridge is to the southwest of the Interstate in Eugene's Laurel Hill Valley neighborhood. The transmission line is not located on the crest of a hill. To illustrate this, SUB is including a Google Earth 3D aerial photo of the transmission line area in relation to the cut in location of I-5 and the larger hillside. (See Google Earth 3D of Hillside.)

[1] PLS-CADD refers to Power Line Systems – Computer Aided Design and Drafting. PLS-CADD is an industry recognized program for designing transmission lines.

16. Slope Stability along the Transmission Line Corridor.
Springfield Utility Board included two geotechnical reports in its Site Plan review application submittal – Geotechnical Investigation and Seismic Hazard Study, dated September 19, 2018 and Slope Stability Review in Tree Felling Area. The second report, Slope Stability Review in Tree Felling Area, included a section which reviewed the State of Oregon *DOGAMI Landslide Hazard Report* and the DOGAMI database. The DOGAMI data document that there are no known landslide areas within the transmission line corridor or access road area. The nearest landslide is an historic landslide on the opposite side of I-5. The appellant provided testimony and an image from the DOGAMI website that appeared to show a more recent slide area on the site. After further review, it is SUB's interpretation that that particular slide area was not within the physical area of any of SUB's currently proposed improvements but was on the eastern edge of Tax Lot 300 or the lot to the south of that. (See SUB SLIDO LiDAR Map 12-17-18 and Appellant SLIDO Map.)

17. Additional Geotechnical Report.
As noted elsewhere, there are two geotechnical reports on the record for the Site Plan Review application. Staff found them to have adequately addressed applicable concerns and issued a Site Plan Review approval. Nonetheless, out of an abundance of caution, and to enhance your ability to uphold that approval, SUB commissioned a third geotechnical report *Geotechnical Investigation for Transmission line Pole Structures.* This report focusses on analyzing and documenting subsurface conditions within the transmission line corridor. The investigation found no abnormalities and confirms installation assumptions for the pole structures. (See Transmission Line Pole Foundation Memo 7-24-19, Transmission Line Pole Letter 7-30-19 and RUS Bulletin 1724E-200 Sect 12.)

18. Court Settlement and Property Ownership.
SUB included a copy of the Stipulated General Judgement regarding SUB's acquisition of Tax Lots 1000, 1100 and a portion of 3701. SUB is now submitting the Settlement Agreement associated with that property acquisition. (See Settlement Agreement 1-22-19.)

19. Irrigation.
Appellants have questioned the lack of a permanent irrigation system in SUB's revegetation plans for the property. The city's rules allow for alternative landscaping plans. I am a licensed landscape architect and my firm has designed the vegetation plans for the property. The plans call for drought tolerant native plants consistent other plans approved by the city, as explained by city staff at the July hearing. Trees will be planted with a slow-release, soil-bacteria activated food-grade water-bound gel. This is an industry accepted practice to provide watering during the tree's initial establishment period. Should this not be sufficient, SUB agrees to provide additional hand watering as needed during the establishment period following planting.

A Summary of Attachments Referenced Above

1. SUB Transmission Vegetation Management Program 6-17-13.
2. BPA DOE Vegetation Management Program 12-29-16.
3. BPA Keeping the Way Clear for Safe Reliable Service 7-2016.
4. Tree Felling Decision.
5. CSF 44759 PLA SURVEY FOR SUB 071119.
6. ODOT ROW Use Not Allowed 9-10-18.
7. ODOT Crash History 4-2017.
8. Google Aerial with SUB Overlay 6-18-19.
9. Monopoles on a Hillside 100-foot Veg Mgmt.
10. Monopoles on a Hillside 50-foot Veg Mgmt
11. Google Earth 3D of Hillside.

12. SUB SLIDO LiDAR Map 12-17-18.
13. Appellant SLIDO Map 7-16-19.
14. Transmission Line Pole Foundation Memo 7-24-19.
15. Transmission Line Pole Letter 7-30-19.
16. RUS Bulletin 1724E-200 Sect 12.
17. Settlement Agreement 1-22-19.

A List of Additional Material to be Included in the Record for this Case

1. Access Road and Transmission line Easement (Access Rd Trans Line Ease Map 10-10-17).
2. EWEB Consent to SUB Applic 6-6-19.
3. Ordinance No. 6341 (Ord 6341 Amend PFSP 9-8-15 lr).
4. Necessity Timeline 12-10-18.
5. Letter Tree Fell Appeal – Response to Arborist.
6. Stipulated General Judgement.
7. Wetland Fill Permit Excerpt.

In summary, as is well documented in the record, and as Springfield staff have documented, SUB has met its burden of proof in terms of compliance with applicable Site Plan Review criteria of approval.

Sincerely,

Richard M. Satre

Richard M. Satre, AICP, ASLA, CSI, Principal
Schirmer Satre Group