

February 17, 2021 Boardman Plant

Sarah Esterson Senior Policy Advisor Oregon Department of Energy 550 Capitol Street NE, 1st Floor Salem, OR 97301

Subject: Boardman Coal Plant Terrestrial Monitoring Program; 2021 Monitoring and Reporting Plans

Ms. Esterson,

Portland General Electric (PGE) ceased generating electricity at the Boardman Coal Plant in October 2020. Pending completion of final site certificate requirements, the company plans to notify the Oregon Department of Energy (ODOE) of official site certificate termination approximately April 2021. This letter summarizes PGE's plans for terrestrial monitoring and reporting in 2021.

PGE conducted terrestrial monitoring activities as required in 2020 and plans to submit an annual report in late March 2021. With the exception of selected monitoring to be continued on site under the Carty Generating Station (CGS) Site Certificate (see below), any monitoring that would typically be conducted in March and April under the Boardman Site Certificate (i.e., raptor surveys, waterfowl breeding pair surveys, and the first round of breeding bird surveys) are part of long-term surveys to monitor trends in wildlife usage around the Boardman Coal Plant. With decades of data already accumulated, and the Boardman Coal Plant no longer operating, it is no longer necessary and will serve little purpose to begin these surveys in early 2021, only to cease them upon site certificate termination. Therefore, unless the schedule for site certificate termination shifts significantly, PGE does not intend to conduct terrestrial monitoring activities under the Boardman Site Certificate during 2021, and the 2020 annual report will be the final report submitted under the program.

Please note that two monitoring surveys from the Boardman Terrestrial Monitoring Program will be conducted in modified form in 2021, as required by the CGS Site Certificate and Wildlife Habitat Monitoring and Mitigation Plan. Those activities are raptor nest surveys and breeding bird surveys associated with the CGS Mitigation Area.

Please let me know if you have questions or concerns about PGE's planned approach for discontinuing the Boardman Terrestrial Monitoring Program.

Sincerely,

Arya Behbehani (Feb 19, 2021 08:39 PST)

Arya Behbehani Senior Director Environmental, Health & Safety Portland General Electric

C: Todd Cornett, ODOE Duane Kilsdonk, ODOE