



# Oregon

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**To:** Energy Facility Siting Council

**From:** Maxwell Woods, Senior Policy Advisor

**Date:** February 28, 2020

**Subject:** Agenda Item D (Action Item):  
Boardman Coal Plant, Request for Change to Terrestrial Monitoring Program  
for the March 13, 2020 EFSC Meeting

**Attachments:** Attachment 1: PGE Request to Discontinue Aerial Photography Monitoring

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## STAFF RECOMMENDATION

Staff recommends Council approve the requested change to discontinue the requirement for aerial photograph monitoring at the Boardman Coal Plant site.

## BACKGROUND AND DETAILS OF REQUEST

The site certificate for the Boardman Coal Plant requires that PGE, the certificate holder, implement a terrestrial ecological monitoring program. As part of this program, PGE has conducted aerial photography monitoring over the plant and nearby area for 40 years. As noted by PGE, the program was intended to monitor the potential impact of the plant's emissions on nearby vegetation and cultivated farmland. PGE has implemented this program for 40 years, which involves monthly aerial flights during the growing season. The results of the photographs and monitoring are submitted to ODOE as part of the facility's annual compliance monitoring reporting requirements.

As reported by PGE, the aerial monitoring, and other monitoring efforts, have not shown discernable stress on nearby vegetation related to potential plant emissions. PGE notes that coal dust and dust from the raw biomass piles is known to have drifted to areas downwind of the facility site, but remaining on PGE property. PGE additionally notes that this dust drift is well-documented and is also visible from publicly available satellite imagery.

In addition to the lack of useful information or information related to potential impacts from the aerial imagery, PGE notes that the plant will cease generating electricity and burning coal by the end of 2020, and the coal yard and plant will be cleaned up starting in 2020 and finishing anticipated in 2021.

The Department agrees. The aerial imagery has not shown discernable impact from the plant emissions and is of little to no value to the Department otherwise. No other site certificate holder is required to conduct aerial imagery at a facility site. Furthermore, with the plant ceasing operations by the end of 2020, conducting the additional aerial photography in 2020 would not provide value to the Department and is an unnecessary cost.

As part of its review of the PGE request, the Department conferred with ODFW district biologist for Morrow County, Steve Cherry. Mr. Cherry agreed with the PGE request and confirmed that ODFW does not have concerns regarding stopping the aerial photography. Mr. Cherry also confirmed that the facility monitoring reports, including the aerial photography, have not shown vegetative concern related to the facility that would warrant real concerns for wildlife; as such, ODFW has no issue with eliminating the aerial photography monitoring.

It is important to note that PGE made a similar request in 2004. At that time, the request to drop the aerial monitoring was part of a larger requested change package of the Boardman Coal Plant environmental monitoring requirements. The Department (and ODFW) agreed with PGE that the aerial monitoring was unnecessary and could be discontinued; however, EFSC disagreed, and did not allow the aerial monitoring to be discontinued. In its final order, EFSC found that “PGE did not demonstrate to the Council’s satisfaction that it is in the public interest to discontinue the aerial monitoring program at this time.” There is limited information in the record as to why Council reached this conclusion in 2004, but staff was able to find the meeting notes from the July 2004 meeting where Council debated the topic. There appears to have been debate between Councilmembers based on approximately five public comments submitted on the request to discontinue aerial photography, but the meeting notes referencing public comments seems to list more comments specific to general issues concerning emissions from the Boardman Coal Plant and only two comments regarding the value of the aerial photography program. Ultimately, Council had a split vote, 4-3, to disallow PGE’s request to discontinue aerial photography monitoring.

As described here, PGE has now collected 15 years of additional information through the aerial monitoring and other monitoring means since that 2004 request, and results continue to show no impact from facility emissions to surrounding vegetation.

#### **RECOMMENDED COUNCIL ACTION**

For the reasons outlined in this staff report, the Department recommends Council accept PGE’s request to discontinue the aerial photography monitoring and modify the Boardman Coal Plant terrestrial monitoring program as requested by PGE.

#### **ATTACHMENTS:**

Attachment 1: PGE Request to Discontinue Aerial Photography Monitoring