

To: City of Sherwood Hearings Officer
Re: LU 2026-006 – Meadowlark CUP-SPR
Support for Approval

Dear Hearings Officer:

My name is Jim Huston. I live at 21125 SW Ramblin Reck Road, which has a Sherwood address and is in the Sherwood School District, although my property is in unincorporated Washington County.

I am writing in support of approval of LU 2026-006, the Meadowlark CUP-SPR associated with BrightNight's Nottingham Energy Storage Project.

My wife and I have spent many years walking and supporting the Tualatin River National Wildlife Refuge, and I care deeply about protecting the Refuge and its migratory birds. I have also supported numerous conservation efforts in the Northwest.

That is not incidental to my support for this application. **It is one of the reasons I support it.** After looking carefully at the proposed infrastructure, the potential impacts on birds and habitat, and the measures proposed to avoid and mitigate those impacts, I believe this application represents a responsible accommodation of two important environmental objectives: protecting wildlife and building the electrical infrastructure Oregon needs.

I understand that the Hearings Officer's responsibility is not to decide whether energy storage is a good idea in the abstract, but whether this application satisfies Sherwood's conditional-use criteria. I believe the record supports those findings, particularly the criteria concerning community need, mitigation of adverse effects, suitability of the site, and protection of wildlife and the natural environment.

Community need – §16.82.020(C)(3)

There is a compelling need for the infrastructure this application would serve. The Nottingham project is a 200-MWh battery energy storage facility located near the existing Sherwood Substation and an established energy corridor. The CUP is needed to provide the interconnect from the energy storage to the grid. The location is important. BrightNight reports that it evaluated more than 40 potential locations and that proximity to the Sherwood Substation is critical to the project's ability to meet electrical and reliability requirements. The transmission system in the area is increasingly congested, and Nottingham was selected as the lowest cost / lowest risk option for PGE customers. Nottingham is not simply infrastructure serving an abstract climate objective. It is energy storage located next to an existing critical grid node where additional capacity is needed.

The economic benefits are also significant. BrightNight estimates 175-200 direct and indirect jobs during construction and \$37.6 million in tax revenue over the 20-year life of the project. Those economic benefits do not excuse environmental impacts, but they are legitimate community benefits to consider alongside grid reliability and energy-system benefits.

For these reasons, I believe the project strongly supports the finding under C.3 that the facility meets important needs of the community.

Mitigation and suitability of the location – §16.82.020(C)(4) and (5)

I recognize that new electrical infrastructure can have adverse effects. The question should not be whether a project can be built with literally zero impact. The appropriate question is whether impacts have been avoided where possible and whether remaining impacts can be sufficiently mitigated.

That distinction is especially important here. The application before Sherwood is not a proposal to construct miles of new overhead transmission through the Tualatin River National Wildlife Refuge. LU 2026-006 proposes an above ground line less than a quarter mile in length, three riser poles no more than 55 feet high, an underground 230-kV transmission line, and an access road connecting to SW Langer Farms Parkway. The larger Nottingham project is also being located near substantial existing electrical infrastructure to avoid introducing a new energy corridor into an untouched landscape.

Some of the line is buried, so why not bury it all?

At first glance, burying the entire gen-tie might seem preferable. BrightNight's engineering analysis, however, identifies three reasons why undergrounding the floodplain portion could be impractical and potentially more environmentally disruptive: unstable soils, substantially greater ground disturbance, and increased difficulty of maintenance and repair. BrightNight is burying what they can, but it is not practical to bury it all. Those facts matter. We should prefer energy infrastructure that uses existing corridors, minimizes new overhead lines, and undergrounds transmission where practical. That is what is being proposed here.

If the Hearings Officer concludes that additional reasonable conditions are necessary to ensure that mitigation commitments are maintained, I would support approval subject to those conditions rather than denial of the CUP.

Wildlife and the natural environment – §16.82.020(C)(6)

This is the criterion I have considered most carefully because of my personal connection to the Refuge.

Opponents have raised legitimate concerns about the proximity of the project to the Tualatin River National Wildlife Refuge and about possible bird collisions with transmission infrastructure. I don't believe those concerns should be dismissed. But neither do I believe they justify denying this application.

Several facts are important.

First, the gen-tie does not cross Refuge property, and BrightNight states that it does not cross the primary flight path between the Refuge and Onion Flats.

Second, much of the transmission infrastructure involved in the Sherwood application will be underground. Only three new riser poles are proposed.

Third, BrightNight has committed to bird-collision mitigation on relevant overhead infrastructure consistent with recommendations of the Avian Power Line Interaction Committee (APLIC), including bird-flight diverters.

There is substantial evidence that this bird-flight diverter technology works. APLIC's review found that marking lines in high-risk areas has frequently produced substantial reductions in collisions¹. A later meta-analysis covering 35 field studies and 66 trials found an average reduction of approximately 50 percent in bird collisions on marked lines².

That is particularly relevant because the area already contains extensive electrical infrastructure without comparable bird-diversion technology. The existing electrical infrastructure provides important context for evaluating the incremental impact of this short new segment. Unlike much of the existing infrastructure in the area, the proposed overhead portion would incorporate modern bird-collision mitigation.

Most important to me, the project also provides a tangible conservation benefit. Of the approximately 32 acres BrightNight acquired, 11 acres are to be transferred permanently to the Tualatin River National Wildlife Refuge. Megan Nagel of the National Wildlife Refuge has described the transaction as an opportunity to restore wetlands that might otherwise not become available to the Refuge and to further the Refuge's long-term goal of connecting additional habitat³.

I find that is especially significant. Habitat loss and fragmentation are among the greatest threats facing migratory birds. Here, a project needed for our electrical system is simultaneously creating an opportunity to permanently expand protected habitat.

Sherwood does not have to choose between energy infrastructure and bird habitat. This project demonstrates that we can build needed infrastructure while protecting—and in this instance expanding—conservation lands.

I therefore believe the evidence supports the finding under C.6 that the proposed use does not pose likely significant adverse impacts to sensitive wildlife species or the natural environment, particularly when the project's avoidance measures, undergrounding, bird-collision mitigation, and permanent addition of land to the Refuge are considered together.

The broader environmental context

I would also urge the Hearings Officer to consider the larger environmental context in evaluating the project's impacts and benefits.

¹ https://studylib.net/doc/18808175/reducing-avian-collisions-with-power-lines?utm_source=chatgpt.com

² https://www.sciencedirect.com/science/article/abs/pii/S0301479719313696?utm_source=chatgpt.com

³ <https://brightnightpower.com/nottingham-energy-storage-project/>

Climate change itself poses a profound threat to birds and their habitat. The U.S. Fish & Wildlife Service has identified habitat loss, degradation and fragmentation as potentially the largest individual threat to migratory birds. Climate change compounds those pressures by altering habitat, food availability, migration timing, drought and wildfire.

Addressing those threats requires more than preserving land. It also requires building a cleaner and more resilient electrical system. Battery storage is part of that system. It allows greater utilization of intermittent renewable resources, supplies electricity during periods of high demand, and can reduce the need for additional long-distance transmission infrastructure.

There is therefore an environmental consequence to **not building** necessary energy infrastructure as well as an environmental consequence to building it.

I do not suggest that this means environmental concerns should be ignored. Quite the opposite. We should identify environmental impacts, avoid them where possible, mitigate those that remain, and impose enforceable conditions where appropriate. But once those things have been done, we also must be willing to build.

Conclusion

I have walked the Tualatin River National Wildlife Refuge hundreds of times. I value it enormously and want it protected for generations to come. After reviewing this project, I do not believe protecting the Refuge requires denying LU 2026-006. I believe the more responsible course is to approve the application, ensure that the proposed wildlife and environmental mitigation measures are enforceable and maintained, and allow this needed electrical infrastructure to proceed.

The project makes efficient use of an area already containing substantial energy infrastructure, places much of the new transmission infrastructure underground, incorporates measures to reduce bird collisions, avoids crossing Refuge property and the primary Union Flats flyway, provides important grid and community benefits, and facilitates the permanent addition of 11 acres to the National Wildlife Refuge.

For these reasons, I believe the relevant conditional-use criteria—particularly §16.82.020(C)(3), (4), (5), and (6)—are satisfied. I respectfully ask the Hearings Officer to approve LU 2026-006, with reasonable conditions necessary to ensure that the project's mitigation commitments are carried out for the life of the project.

Sincerely,

James W. Huston

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21125 SW Ramblin Reck Road
Sherwood, Oregon