

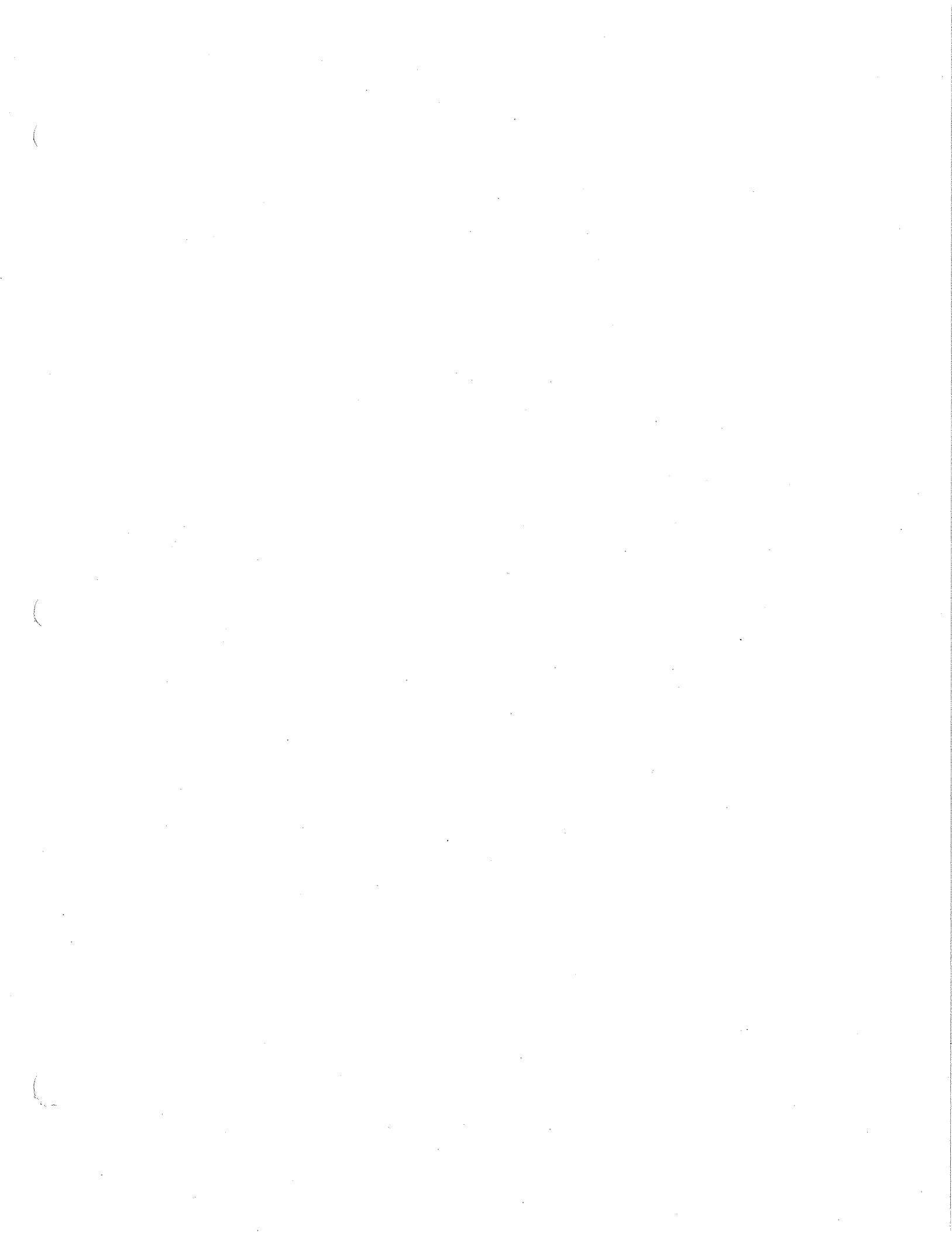
SUPPLEMENT TO THE APPLICATION FOR SITE CERTIFICATE FOR THE KLONDIKE III WIND PROJECT

ORGANIZATION OF THIS DOCUMENT

1. ITEMS OF GENERAL INTEREST OR THAT INCLUDE INFORMATION ON SEVERAL EXHIBITS
 - Response To Request for Additional Information #1
 - Response To Request for Additional Information #2
 - November 11, 2005 Memo
 - Siegfried email 12/7/05 attachments:
 - i. Siegfried memo, Response to 11/22/05 email (12/6/05)
 - ii. Revised table P-3
 - iii. Siegfried memo, Turbine Corridor Micrositing (12/9/05)
 - iv. Table of string ends
 - Siegfried email 1/19/06, confirming allocation of acreage

2. SUPPLEMENTAL INFORMATION ON SPECIFIC EXHIBITS
 - TAB E:
 - i. Gronner email 1/18/06, with:
 - a. EMF calculation, overhead 24.5 kV transmission line
 - b. Evaluation application for septic permit from Wasco-Sherman Public Health Department
 - ii. Gronner email 1/18/06, test pit application
 - TAB F: Revised Property Ownership
 - TAB J:
 - i. Siegfried email 12/28/05, wetland analysis revision
 - ii. Siegfried email 1/6/06, wetland analysis area revision
 - TAB K:
 - i. Farm owner and operator surveys
 - ii. Revised Figure K-1
 - TAB L: Revised Exhibit L (RAI#2)
 - TAB M: Appendix M: replacement legal opinion
 - TAB N: This page intentionally left blank
 - TAB O: Letter confirming water availability (RAI#2, Appendix O)
 - TAB P:
 - i. Maps (revised figures P-1 through P-6)
 - ii. Revised Tables P-3 (300 ft. and 900 ft. corridors)
 - iii. Memo from Martha Moore (12/15/05)
 - iv. Draft Wildlife Monitoring and Mitigation Plan
 - v. P-2: Wildlife survey summary (7/28/05)
 - vi. P-3: Klondike I avian and bat mortality study (March, 2003)
 - vii. Revised table P-3 (RAI#2)
 - viii. P-4: Baseline avian use at Klondike III (June, 2005)
 - TAB Q:
 - i. Correction on page Q-12, Siegfried email 11/4/05
 - ii. ONHP data sheet on WGS (RAI#2)
 - iii. P-1: rare plant survey (7/11/05)
 - TAB R: Revised Exhibit R (9/16/05)
 - TAB S: Revised cultural resource report figures, RAI#1, Appendix S

- TAB T: White River State Park, Siegfried email 11/9/05
- TAB U:
 - i. Letter from Sheriff's Department, RAI#1, Appendix U
 - ii. Letter from Emergency Services, RAI#1, Appendix U
 - iii. Revised letter from Sheriff's Office, Siegfried transmittal 11/28/05
 - iv. Revised Exhibit U (September 16, 2005)
- TAB V: Soil depth letter (RAI#2, Appendix V)
- TAB W:
 - i. Gronner email 1/9/06 revised Blattner evaluation
 - ii. Producer Price Index printout, RAI#1, Appendix W
 - iii. Revised Blattner estimate (RAI#2, Appendix W)
- TAB X:
 - i. Responses to Kerrie Standlee's questions (RAI#2, Appendix X-1)
 - ii. GE Wind technical specification (RAI#2, Appendix X-2)
 - iii. Contour modeling output data, RAI#1, Appendix X-2
 - iv. Gronner email 12/13/05
 - v. Gronner email 1/10/06, Vestas noise info, with attached noise measurement summary
 - vi. Figure X-1, 36 dBA counter map, RAI#1, Appendix X-1
 - vii. Gronner 1/10/06 memo with attached revised noise analysis
 - viii. Gronner email 1/18/06, with TW Environmental and noise modeling data (showing "eliminated towers")
- TAB Z: This page intentionally left blank
- TAB AA:
 - i. EMF analysis for the underground collector line, RAI#1, Appendix AA-1
 - ii. Induced current analysis, RAI#1, Appendix AA-2
 - iii. Interference analysis, RAI #1, Appendix AA-3
 - iv. Gronner email 1/18/06, with:
 - a. EMF calculation, overhead 34.5 kV line, test pit application



Klondike III Wind Power Project

Response to First Request for Additional Information (RAI) – Dated July 8, 2005

Req. #	Page reference	Request for additional information
Exhibit B - Facility		
B1	B-2	<p>The application defines “site boundary” and “site” for linear parts of the facility by a distance from centerline (e.g., 150 feet from turbine string centerlines). Do you measure this distance from both sides of the centerline? (e.g., 150 feet on both sides of center for a total width of 300 feet)?</p> <p>Response: Yes, total width of linear features is measured 150 feet to each side of centerline, which equates to a total width of 300 feet.</p>
B2	B-4	<p>“A site plan is included in Exhibit C.” We assume that figure C-2 is the “site plan.” Is that correct?</p> <p>Response: Correct, figure C-2 is the “site plan.”</p>
B3	B-7	<p>Do you anticipate generating any wastewater from blade washing during operation of the proposed facility? If so, how much? If not, why not?</p> <p>Response: Blade washing is not anticipated, as blade washing is not recommended by the manufacturer.</p>
B4	B-9	<p>Who must approve the “final transportation plan”?</p> <p>Response: Sherman County is responsible for approving the final transportation (or traffic circulation plan) as part of the building permit process.</p>
B5	B-10	<p>What are the dimensions of the two alternative turbine sizes (1.5 MW and 1.65 MW) and their turbine towers? Which turbine size (generating capacity) does Appendix C-4 illustrate?</p> <p>Response: The 1.5 MW turbine has a hub height of 80 meters and rotor diameters of 82.5 meters. The 1.65 MW turbine has a hub height of 80 meters and blade length of 82 meters. Appendix C-4 illustrates a “typical” tower, not either of the specific towers under consideration for this project.</p>
B6	B-11	<p>We consider underground collector lines to be “transmission lines.” Accordingly, please provide the information described in OAR 345-021-0010(1)(b)(E) for the proposed underground transmission lines.</p> <p>Response: OAR 345-021-0010(1)(b)(E) (i) [Length of transmission line]: The underground transmission line will be approximately 38 miles long.</p> <p>OAR 345-021-0010(1)(b)(E) (ii) [Proposed right-of-way width, including extent of new right-of-way required or widening of existing right-of-way needed]: County road right-of-way is 60 feet; 18.7 miles of underground transmission line will be within this right-of-way, not adjacent to it. No new right-of-way or widening of existing right-of-way will be required.</p> <p>OAR 345-021-0010(1)(b)(E) (iii) [Public right-of-way needs (where in public right-of-way, if not in public right-of-way but adjacent to public right-of-way, then justification for adjacency)]: 18.3 miles of the underground collector line will be within existing county road right-of-way; no instances where the underground transmission line would run adjacent to existing public right-of-way but not actually in the right-of-way. The remaining 19.7 miles of underground transmission will be within the leasehold lands of the project.</p>
B7	B-12	<p>Section B.6 provides the anticipated construction schedule. The site certificate must have deadlines for beginning and completing construction. What deadline dates would the applicant propose? (Generally, the Council has allowed two years from the issuance of the site certificate as a deadline for beginning construction.)</p> <p>Response: Applicant proposes an earliest construction beginning date of Spring 2007 and an earliest commercial operation date of September 2007. Applicant proposes to commence construction no later than three years from the issuance of the site certificate as Applicant will not be able to control the schedule of BPA’s upgrade associated with the proposed facility.</p>

Req. #	Page reference	Request for additional information
Exhibit C - Location		
C1	C-1	<p>The location of the project components is shown by reference to Figure C-2. Figure C-2 shows individual turbine locations. On page B-8, the application states that either 1.5 MW or 1.65 MW turbines would be used. How would the choice of turbine size affect the layout shown on Figure C-2? Would the turbine pad locations be as shown on Figure C-2, regardless of turbine size?</p> <p>Response: The choice of turbine will not affect the site layout; the turbine pad locations will be as shown on Figure C-2 regardless of the turbine size.</p>
Exhibit D - Organizational Expertise		
D1	D-6	<p>Please supply a few examples of mitigation projects that PPM Energy has completed at other wind power generating projects.</p> <p>Response: At the Shiloh Wind Project in Solano County, California, PPM Energy developed a Raptor Mitigation Plan, which provides micro-siting and design guidelines for minimizing impacts to raptors. For the same project, PPM Energy is in the process of acquiring a conservation easement on 120 acres near the project to mitigate for potential avian mortality impacts. In Washington, for the Big Horn Wind Project, PPM Energy is acquiring an approximately 180-acre conservation easement to mitigate for habitat impacts of the wind project. PPM Energy has also funded basic research on biological impacts of wind energy. For example, PPM Energy is in its second year of funding for the Bat Wind Energy Cooperative, which is evaluating interactions of bats and wind projects at several wind project sites. We have also made a 4-year commitment to funding research into the potential displacement impacts of wind energy on grassland nesting avian species such as prairie chickens.</p>
Exhibit E - Permits		
E1	E-6, E-10	<p>See the June 16, 2005, comment letter from Sherman County. Please correct the references to SCZO § 11.8.</p> <p>Response: At E.2.3 Local Permits on page E-5 and at E.3.3 Local Permits on page E-10 of the Application the reference to SCZO Section 11.8 is deleted and replaced with the following: "SCZO Section 3.1.3.17 – Commercial Utility Facilities are a Conditional Use permitted in the County's F-1 Zone. The applicable conditional use criteria are found in relevant provisions of SCZO Article 5."</p>
E2	E-10	<p>It is incorrect to say that "Land use building permit approval will be sought through the Council." The approval of building permits is not within the Council's jurisdiction (ORS 469.401(4)). KIII has requested a Council decision on the Land Use Standard (Application, page K-1), and the Council's decision on the issuance of a Conditional Use Permit will be binding on Sherman County. If the site certificate is issued, the County must issue a Conditional Use Permit upon submission to the County of the appropriate application and fee. The approval of building permits is not part of the land use decision. KIII would have to apply to the County for any required building permits. The site certificate application should acknowledge KIII's understanding of these separate requirements and approvals.</p> <p>Response: Correction of this error is noted. We understand that the County issues building permits. We further understand that Council's determination on compliance with land use requirements will be binding on the County.</p>
E3	Exh. E	<p>Note the requirements of OAR 345-021-0000(5). For federally-delegated permits (such as the 1200-C NPDES permit), this rule requires the applicant to submit a letter or other indication from each responsible agency stating that the agency has received a permit application from the applicant, identifying any additional information the agency is likely to need from the applicant based on the agency's review of the application as submitted, and estimating the date when the agency will complete its review and issue a permit decision. For non-federally delegated permits for which the Council must determine compliance with applicable standards (such as the on-site sewage disposal system permit from Sherman County), the applicant must provide a letter or other indication from each responsible agency stating that the permit application received from the applicant provides an adequate basis for a permit decision.</p>

Req. #	Page reference	Request for additional information
		Response: The applicant is seeking a letter from DEQ, which is charged with evaluating the federally-delegated NPDES 1200-C permit. No other federally delegated permits are required for the project.
Exhibit H - Geology		
H1	H-3	<p>The Council considers underground collector lines to be “transmission lines.” Accordingly, please provide the information described in OAR 345-021-0010(1)(h)(C) for the proposed underground transmission lines.</p> <p>Response: The underground collector lines are all within the site boundary. Exhibit H has described the geological and topographical features, the site-specific geologic and geotechnical work, soil stability, and the seismic and non-seismic hazards of the area where the underground collector system is located. Based on the generally low risk of seismic hazards, no seismic mitigation is required for the underground collector system. The presence of loess soils in the area of the underground transmission system can be accommodated through conventional design methods.</p>
Exhibit I - Soils		
I1	I-2, I-3	<p>The application says on page I-2 that construction would temporarily disturb “46 acres” of land; however, it says on page I-3 that construction would temporarily disturb “55 acres.” Please clarify.</p> <p>Response: Construction would temporarily disturb 46 acres of land. The 55 acre figure on page I-3 is in error and should read “46 acres”.</p>
I-2	Appendix I-2	<p>The response to Question 5 in the 1200-C application mentions temporary mobilization, staging and laydown areas for use by contractors. Are these areas included in the 19 laydown areas described in Exhibit B or would additional land be used for this purpose?</p> <p>Response: Yes, the temporary mobilization, staging and laydown areas for use by contractors are included in the 19 laydown areas described in Exhibit B. No additional land will be used for this purpose.</p>
Exhibit J - Wetlands		
J1	Appendix J-1	<p>Please explain the statement on page “i”: “Final verification of this wetland delineation is to be made as part of the Oregon Energy Facility Siting Council process.”</p> <p>Response: Appendix J-1 describes the applicant’s determination of the boundaries of wetlands and other waters of the state. The state has the final authority to determine its jurisdictional boundaries of these resources. Verification of jurisdictional boundaries by the state occurs during review and approval of the Application for Site certificate.</p>
Exhibit K - Land Use		
K1	K-2	<p>The application says on page K-2 that Figure K-1 shows “Comprehensive Plan designations,” County zones and areas of temporary disturbance, but Figure K-1 does not show this information. Please provide a map as described in OAR 345-021-0010(1)(k)(A).</p> <p>Response: A revised map has been provided and is attached in RAI Appendix K.</p>
K2	K-4	<p>Would there need to be one or more turn-around areas on each turbine string to allow room for large construction vehicles to maneuver? Will the turn-around areas be included within the 19 temporary staging areas? If not, will the turn-around areas be areas of permanent disturbance, or would they all be restored upon completion of construction?</p> <p>Response: A temporary turnaround for the crane at the end of each string will be required during construction; all of these areas will be restored as described in Exhibit I; lands will be returned to cropped areas or re-seeded to stabilize soils.</p>
K3	K-5	<p>The response to (c) says “Except as discussed herein...” To what does this “exception” refer?</p> <p>Response: That phrase was intended to be a “place holder” in the event that the State had adopted new rules or policies that had not yet been incorporated into the County Comprehensive Plan and/or land use implementing ordinances. Sherman County has a Comprehensive Plan and land use implementing</p>

Req. #	Page reference	Request for additional information
		ordinances acknowledged by the Oregon Land Conservation and Development Commission, and the statewide planning goals and relevant Oregon land use regulations are incorporated in the Comprehensive Plan and land use implementing ordinance. No relevant State rules have been adopted that are not incorporated into the County's Comprehensive Plan and land use implementing ordinances; therefore, no exceptions requiring direct application of newly enacted state rules or policies were discussed in the text of Exhibit K.
K4	K-5, K-6	<p>Given the statement in response to (e) on page K-6 that an exception to Goal 3 is needed, please clarify the statement on page K-5 in response to (d) that "the application does not directly apply the statewide planning goals."</p> <p>Response: Since Sherman County has a Comprehensive Plan and land use ordinances acknowledged by the Oregon Land Conservation and Development Commission as incorporating and implementing the Statewide Planning Goals, the Goals are applied through the County's Comprehensive Plan and implementing ordinances. Therefore, the statewide goals are not directly applied to the project. Exceptions to statewide planning goals where a jurisdiction has an acknowledged Comprehensive Plan are processed by applying the Comprehensive Plan and implementing land use ordinances.</p>
K5	K-6	<p>Does the SCZO contain a definition of "commercial utility facility"?</p> <p>Response: No. Only "Utility facilities" are defined in Article 1 of the SCZO as: "Any major structure owned or operated by a public, private, or cooperative electric, fuel, communication, sewage or water company for the generation, transmission, distribution or processing of its products or for the disposal of cooling water, waste, or by-products, but excluding local sewer, water, gas, telephone and power distribution lines, and similar minor facilities." Then Section 3.1 makes a distinction between non-commercial utility facilities (allowed use) and commercial utility facilities (conditional use).</p>
K6	K-6, K-8	<p>What are the "applicable standards" for transportation projects?</p> <p>Response: Applicable standards in the case of the County's Transportation Systems Plan (TSP) refer to items such as roadway and pavement widths based on the road classification. Other items would be methods of construction, turning radii, striping and signs, etc. Since no new public roads are proposed and only improvement of existing roads is proposed, these standards do not apply. The proposed road reconstruction will exceed the standards in the TSP.</p>
K7	K-14	<p>The application on page K-14 says "washdown of concrete trucks will likely occur at a contractor-owned batch plant." (The same statement is made on page V-1.) This suggests that washdown could also occur on the facility site, which could pose an erosion problem or possibly degrade agricultural lands. The application should discuss these impacts and possible mitigation or propose that no concrete truck washdown would be allowed on-site (this could be required through a site certificate condition).</p> <p>Response: Washdown will only occur at the contractor-owned batch plant.</p>
K8	K-17	<p>The application says: "During its anticipated 20 to 30 year operation, the project would employ 15 to 20 full-time and part-time employees." Does this mean 15-20 employees over the course of 20 or 30 years, or does it mean that at any given time during operation the facility would have 15-20 employees?</p> <p>Response: At any given time during operation the facility would have 15 to 20 employees.</p>
K9	K-23	<p>The application at page K-23 suggests that the royalty income to "landowners" would exceed the loss of revenue from crop production. To what extent would the loss of revenue be borne by farmers who lease the land and who would not receive the royalty income that would go to the landowners?</p> <p>Response: PPM compensates both farm operators and property owners for loss of revenue from crop production. Compensation is mutually agreed upon between PPM individual farm owners and operators.</p>
K10	K-23, K-24	<p>The application says that it does not propose a "high voltage electrical transmission line as that term is defined in ORS 469.300(11)(a)(C)." SCCP Goal XVIII, Policy III, addresses "high voltage electrical transmission lines" but does not incorporate the definition in ORS 469.300. Policy III contains obsolete references to Siting Council standards for transmission lines. The application should acknowledge that the current Council rules contain standards for "any high voltage transmission line under Council jurisdiction" in OAR 345-024-0090. This applies to high voltage transmission lines that are related or</p>

Req. #	Page reference	Request for additional information
		<p>supporting facilities and not just to transmission lines that would meet the “energy facility” definition in ORS 460.300. High voltage lines that are related or supporting facilities would also be subject to standards that apply to the facility as a whole.</p> <p>Response: The applicant does not propose a “high voltage electrical transmission line” as that term is defined in ORS 469.300(11)(a)(C). OAR 345-024-0090 contains standards for any high voltage transmission line under the Council’s jurisdiction, including any transmission line that is a related or supporting facility. “Related or supporting facilities” are defined at OAR 345-001-0010(47) to include transmission lines proposed to be built in connection with the construction or operation of an energy facility. The Council interprets the term “proposed to be built in connection with” to mean that a structure is a related or supporting facility if it would not be built but for the construction or operation of the energy facility. For any transmission line that is a related or supporting facility, a site certificate applicant must show that the line can be designed, constructed and operated so that alternating electric fields do not exceed 9 kV per meter at one meter above ground surface in areas accessible to the public, and can be designed, constructed and operated so that induced currents resulting from the transmission line and related or supporting facilities will be as low as reasonably achievable. These standards apply to the transmission lines (overhead and underground) proposed to be built to serve this project.</p>
K11	K-29	<p>The application says that an on-site sewage disposal permit is needed. The Council will make the permitting decision for this on-site system. The application must include adequate information as a basis for making the permit decision. This may include an analysis by the County about the suitability of the site for an on-site system. Please respond to the matters discussed in the agency comment letter from Dick Nichols (Oregon DEQ, e-mail dated May 18, 2005).</p> <p>Response: The applicant will conduct the required test pit evaluation with County oversight, and provide the required application to the Department of Energy.</p> <p>Response to DEQ letter :</p> <p>ODEQ: Vault toilets used during construction must be provided and serviced by a Oregon DEQ-licenses sewage service provider OAR 340-71</p> <p>Response: The vault toilets will be provided and serviced as required by state law.</p> <p>ODEQ: A permanent on-site sewage disposal system (septic tank and drainfield) will require a site evaluation conducted and permit issued by the Wasco/Sherman Health Department. The requirement for this is also in OAR 340-71.</p> <p>Response: As described above, the applicant will provide the necessary information for the council to make this permit decision.</p> <p>ODEQ: No floor drain in the O&M facility (or anywhere else for that matter) may be connected to the septic system. OAR 340-44</p> <p>Response: No floor drain will be installed in the O&M or other KIII facilities.</p> <p>ODEQ: Undoubtedly, more than 1 acre of land will be disturbed during construction so these folks will need to apply for and obtain a NPDES construction stormwater permit. OAR 340-45 and federal law. More details on the requirements for this can be found on our website.</p> <p>Response: An application for the NPDES construction stormwater permit will be submitted to DEQ, and a letter requested from DEQ that states there is adequate information on which to base a permit decision.</p>
K12	K-32, Appendix K-2	<p>Beginning at page K-32, the application refers to a survey of local farmers and Appendix K-2 describes the survey in more detail. Please provide copies of all completed survey questionnaires.</p> <p>Response: Copies of the survey are included in Appendix K.</p> <p>To help us understand the significance of the survey, please respond to the following questions:</p> <ol style="list-style-type: none"> 1. Besides the 12 landowners who responded to the survey, how many other farmers would be directly affected by placement of turbines or other facility components on the land that they farm?

Req. #	Page reference	Request for additional information
		<p>Response: There are 12 property owners who will be directly affected by turbines and other facility components. Some of these properties are farmed by the same farm operator(s) while some are farmed by the property owners themselves. The survey was done with either the property owner, the farm operator or both so that all of the properties were covered by the survey.</p> <p>2. Explain what is meant by “farmed contiguous parcels” and describe how the area of “farmed contiguous parcels” was determined.</p> <p>Response: “Farmed contiguous parcels” refers to parcels that are farmed by the same operator or owner. The point of this distinction is to determine the entire size of an area farmed by the same person, because the larger the area, generally the more efficient the farming becomes and also the more flexibility an operator has in adjusting to the presence of the turbines.</p> <p>3. Show how the percent area removed from production was calculated (Appendix K-2, Table 1).</p> <p>Response: The area removed from production was based on 2 acres per turbine times the number of turbines, divided by the total farmed acreage.</p> <p>4. Aside from the land taken out of production, would there be other financial impacts on farming (for example, increased cost of farming land not taken out of production)?</p> <p>Response: None of the survey respondents said the project would increase farming costs. There may be some additional time required to maneuver around the turbines with farm vehicles and equipment. However, this was not mentioned by the farmers. The opportunity cost of that time could be offset by better local access and improved public roads that will accommodate wider equipment without blocking traffic. See discussion on Farm Practices, Page 2 of the Appendix.</p> <p>5. How was the survey administered (for example, were the respondents asked to respond in writing to a questionnaire? Or, did an interviewer fill out the questionnaire based on a conversation with the landowner)?</p> <p>Response: The applicant met with the interviewed landowners and farmers and filled out the questionnaires based on their oral answers.</p> <p>6. How many of the respondents actively farm the affected land? How many are landowners who lease their land to other farmers?</p> <p>Response: Four respondents farm their own land. Eight landowners lease their property to other operators.</p> <p>7. What is the estimated amount of the additional property taxes that would be paid by landowners? Are any of the landowners compensated for those additional taxes as a part of the wind lease agreement?</p> <p>Response: Landowners will pay no additional property taxes for the value of the improvements of the facility. The wind lease agreement requires that the lessee pay for all additional property taxes owed due to the facility. Sherman County has historically sent separate tax bills to PPM for Klondike I.</p>
K13	K-34, K-35	<p>The facility must not significantly increase the cost of accepted farm practices on surrounding lands. Aside from the loss of farm income from land taken out of production, would there be other financial impacts on farming? What costs are associated with the “forced changes in harvesting patterns,” the “difficulty in moving and manipulating equipment” and the other impacts on farming practices discussed in Appendix K-2? Were the landowners or farmers of the two “not leased” areas shown on Figure C-2 interviewed regarding potential impacts of the facility on their farming practices?</p> <p>Response: The survey respondents did not indicate any significant financial impacts on farming associated with the construction or operation of the project. As noted in the Appendix, the increased time to harvest crops due to maneuvering around the wind turbines may increase costs slightly, but most of the farmers said this did not represent a significant change in accepted farm practices nor a significant increase in costs. For those who move equipment along local roads, there would be a benefit from the improved and widened roads. The landowners of the two “not leased” parcels were not interviewed</p>

Req. #	Page reference	Request for additional information
		because there is expected to be no impact on their farming practices.
K14	K-39, Appendix K-2	<p>Appendix K-2 describes the agricultural soil in the area as "Class II" and states that "high-value farmland is land with exceptionally good soils, specifically those that include soils rated...Class II." If the affected agricultural land is "high-value," explain why the Goal 3 exception analysis on page K-39 applies the "20 acres or less of non-high-value-farmland" standard rather than the 12-acre standard for high-value farmland.</p> <p>Response: The Appendix should have indicated that farmland in Sherman County is not considered by the County as high-value according to a personal conversation with the Sherman County Planning Director, Georgia McNab. State law (ORS 215.710) describes non-irrigated high-value farmland as those classified with prime, unique Class I or Class II soils (ORS 215.710(1)(b)). The County uses soil types to determine whether types in Sherman County are of high-value and have concluded there are no prime, unique Class I or Class II soils in Sherman County, including on the project site or in the project area. Therefore, the Goal 3 exception analysis standard of 20 acres is correct.</p>
K15	K-39	<p>In the analysis of the Goal 3 exception, does the "70 acres" precluded from use as a commercial agricultural enterprise include acres precluded by new or enlarged roads? The area permanently occupied by access roads may or may not be considered a part of the "commercial utility facility" that is subject to the acreage limitation. The application should address this question.</p> <p>Response: The 70 acres does include permanent impacts from new and widened roads.</p>
K16	K-39	<p>The Goal 3 exception analysis should provide an explanation of why the "commercial utility facility" cannot be built on a 20-acre site (or a 12-acre site, if the high-value farmland limit is applicable).</p> <p>Response: Wind power projects by their nature require large tracts of land. Each turbine generates approximately 1.5 MW; to construct a 273 MW project, 160 turbines are needed. Turbines must be placed several hundred feet apart. Each turbine requires an adequate foundation (approximately 2000 ft³); in total, turbine foundations will occupy over 7 acres of land. The O&M facility and substations occupy approximately 4 acres each. Road access to the turbine strings must also be constructed, and requires the largest amount of land. It is not possible to site a large wind power project on 20 acres or less of land.</p>
K17	K-40	<p>What is the basis for the statement that "the agricultural value of the site is generally marginal"?</p> <p>Response: The basis for the statement was a discussion with Sherman County Planning Director, Georgia McNab; however, the statement should have read that the site is considered "non-high-value farmland" by the County.</p>
Exhibit L - Protected Areas		
L1	L-1	<p>The June 16, 2005, comment letter from Sherman County raises the question whether US highway 97 or State highway 206 have the status of protected areas as scenic highways. Please research whether either of these highways has any kind of "protected area" status in any location that could be affected by the proposed wind facility.</p> <p>Response: Scenic Byways are not listed as Protected Areas in OAR 345-022-0040(1) and therefore do not have the status of Protected Areas. However, the following information is provided in response to comment L-1:</p> <p>The Journey Through Time Management Plan (April 1996) applies to US Highway 97 in the Protected Areas analysis area. This plan does not prescribe goals or measures for protecting scenic resources in the analysis area. As described in Exhibit T, the proposed facility is compatible with the plan's stated goals.</p> <p>The Oregon Department of Transportation Scenic Byway Program (http://www.odot.state.or.us/techserv/engineer/pdu/SCENIC/Scenic.htm) does not identify State Highway 206 in the analysis area as an All American Road, National Scenic Byway, Oregon State Byway, or Oregon State Tour Route, nor is State Highway 206 mapped as such on the most current Scenic Byway Map, circa 2001. See http://www.odot.state.or.us/techserv/engineer/pdu/SCENIC/State%20Byways%20Map/Byways2001.pdf Therefore, State Highway 206 does not have a "protected area" status.</p>

Req. #	Page reference	Request for additional information
2	L-4	<p>Provide a description of the “seen area analysis” and “computer modeling” that was done. What is the basis for the conclusions stated on page L-4 that “the proposed facility would either not be visible” or “would be visible at such a great distance that effects, if any, would be negligible.” If this conclusion is based, in part, on statements from BLM staff, please provide a letter from the BLM staff expressing that opinion.</p> <p>Response: A description of the “seen area analysis,” “computer modeling,” and results will be provided in revisions to Exhibit R.</p> <p>The determination that the facility would not be visible has been based on site visits to the Protected Areas during which the principal investigator determined that landforms, vegetation, structures, or a combination thereof would effectively block views of the facility.</p> <p>The determination that the facility would be visible at such a great distance that effects, if any, would be negligible, has been based on the relative distance of the Protected Area from the proposed facility (Exhibit L, Table L-1) and observations of the existing wind turbines from similar distances.</p> <p>The principal investigator’s determinations were validated through telephone conversations with local, state, and federal resource agency staff including OPRD, ODFW, BLM, and Oregon State University.</p>
Exhibit M - Financial Assurance		
M1	M-1	<p>The application states that the applicant will provide “a bond, letter of credit, or other security” to satisfy the Council’s financial assurance requirement. “Other security” is not acceptable. The application should acknowledge that the Council requires either a bond or a letter of credit (OAR 345-022-0050(2)).</p> <p>Response: The application states that the applicant will provide “a bond, letter of credit, or other security in a form satisfactory to the Council.” The “other security” proposed would only be valid if satisfactory to the Council.</p>
M2	M-1	<p>The letter from Safeco indicates that a bond could be provided. Has KIII decided to use a bond for financial assurance rather than a letter of credit?</p> <p>Response: The letter from Safeco is for a third-party bond. If a letter of credit is chosen, KIII’s indirect parent company, PacifiCorp Holdings, Inc. would be the entity to provide the assurance.</p>
M3	M-1	<p>The opinion letter from legal counsel states that attorney Nguyen is not a member of the Oregon Bar and that he has no expert opinion regarding the law of states other than Washington or California. Klondike Wind Power III LLC was incorporated under the law of the State of Oregon. Please provide an appropriate legal opinion about the applicant’s legal authority under Oregon law “to construct and operate the facility without violating its bond indenture provisions, articles of incorporation, common stock covenants, or similar agreements.”</p> <p>Response: A replacement legal opinion is attached in Appendix M.</p>
Exhibit O - Water		
O1	O-1	<p>The application states that water needed during construction would be supplied “by a contractor... from a nearby community water system.” Exhibit G, page G-1, estimates the quantity of water needed during construction would be 55,000 gallons per day for dust suppression plus 11,500 gallons for mixing concrete. What is the total estimated consumption of water during construction? Provide evidence that sufficient water is available from nearby community water systems during construction and that the contractor would have access to use this water under existing water rights.</p> <p>Response: On Klondike II, Blattner used 120,000 gal per day during road construction, 80,000 gal per day during foundation construction, and 50,000 gal per day during erection. Blattner used a local alternate source (well water) during Klondike II and due to the season on which they built, used less water. The town of Wasco could also be a source of water supply. Given PPM’s experience with</p>

Req. #	Page reference	Request for additional information
		Klondike II and the strong local support, we are confident that there are sufficient water source alternatives to meet the project requirements.
Exhibit P - Habitat		
P1	P-15	<p>Provide a description and an analysis of the results of the "special status/sensitive plants" survey conducted in Spring 2005.</p> <p>Response: "An Investigation of Rare Plant Resources Associated with the Proposed Klondike III Wind Project, Sherman County, Oregon", Prepared by Eagle Cap Consulting Inc., Dated July 11, 2005, is attached as P-1.</p>
P2	P-15	<p>Provide a description and an analysis of the results of the "special status/sensitive wildlife" survey conducted in Spring 2005.</p> <p>Response: "Summary of 2004-2005 Wildlife Surveys", Prepared by David Evans and Associates, Inc., dated July 28, 2005 is attached as P-2.</p>
P3	P-16	<p>Provide the analysis of existing mortality data evaluating the potential impacts to bat populations.</p> <p>Response: "Avian and Bat Mortality During the First Year of Operation at the Klondike Phase I Wind Project, Sherman County, Oregon", dated March 2003 is attached as P-3.</p>
P4	P-16	<p>Provide the "Final Avian Baseline Report."</p> <p>Response: "Baseline Avian Use at the Proposed Klondike III Wind Power Project, Oregon, Winter 2004-Spring 2005", dated June 2005 is attached as P-4.</p>
P5	P-20	<p>The application says, "the anticipated impacts to the Category 3, upland tree habitat type are illustrated in Figure P-4." Figure P-5 appears to show impact to the same type habitat. Does Table P-3 include the area shown on Figure P-5? Please describe the nature of the impact to the Category 3 upland tree habitat. Please explain what is meant by "these impacts are transferred to Category 3, grassland for purposes of mitigation."</p> <p>Response: Figure P-4 illustrates the site boundary going through an area designated as the upland tree habitat. The activity anticipated in this area is maintenance of an existing road, which will not actually impact the upland trees. Due to the mapping scale, each individual tree cannot be noted on the figures and the individual trees are interspersed with a grassland habitat. As such, these impacts have been transferred to Category 3 grassland because this is reflective of the actual impacts. There are no impacts to Category 3 upland tree habitat illustrated on Figure P-5.</p>
P6	P-21	<p>Provide a copy of the "Scenic Vista Wind Power Project, Draft Exhibit P."</p> <p>Response: The "Scenic Vista Wind Power Project, Draft Exhibit P" was incorrectly referenced, since the DEA Draft Exhibit P contained no references to hoary or silver-haired bats. The source of the quotation concerning bat mortality was likely the Johnson 2004 reference listed on the same page (P-21), one paragraph up, in Exhibit P of the Klondike III ASC. The Johnson reference gives the same information about hoary and silver bats: "The three most common species of migratory bats in the United States (hoary, eastern red, and silver-haired bats) comprised 93% of the 774 bat fatalities identified to species at U.S. wind projects (Johnson 2004)."</p>
P7	P-24	<p>Provide a copy of the results of the avian mortality study conducted at the Klondike I project.</p> <p>Response: "Avian and Bat Mortality During the First Year of Operation at the Klondike Phase I Wind Project, Sherman County, Oregon", dated March 2003 is attached as P-3.</p>
P8	P-24	<p>The application refers to the "preliminary avian baseline study by ABR, Inc. (2005)." Is Appendix P-4 the report on that study?</p> <p>Response: Yes.</p>
P9	P-24	<p>The application refers to a "cumulative effects analysis is being conducted by WEST, Inc." When will a report on that study be available?</p>

Req. #	Page reference	Request for additional information
		<p>Response: The WEST, Inc. study will be conducted for the Bonneville Power Administration (BPA) during the assessment of the BPA transmission line. The study likely will not be available until late 2006.</p>
P10	P-25	<p>What is the significance of winter use data for raptors? Explain why winter use data is especially important.</p> <p>Response: The main reason that winter use data for raptors is important is that it provides information on species such as Rough-legged Hawks that over-winter in the area but are not present in the area during the remainder of the year.</p>
P11	P-26	<p>The data reported for Klondike I suggest a high fatality rate for waterfowl. Does this warrant special monitoring or mitigation at Klondike III for potential waterfowl impacts?</p> <p>Response: Klondike I reported high mean use by Canada Geese (17.41 birds/30 min point count) whereas mean use at Klondike III during this study was much lower (3.66 birds/20 min point count). Although waterfowl fatalities have occurred at several newer generation wind projects, the numbers have been low relative to the mean use at those sites (Erickson et al. 2002). The relatively high proportion (25%) but small number (n = 2) of Canada Geese fatalities at Klondike I do not appear to warrant special monitoring or mitigation, especially in light of the lower mean use values reported in the Klondike III study. Instead, standard fatality monitoring could be considered for Klondike III to help determine seasonal fatality rates for waterfowl and other species of interest.</p> <p>Erickson, W. P., G. Johnson, D. Young, D. Strickland, R. Good, M. Bourassa, K. Bay, and K. Sernka. 2002. Synthesis and comparison of baseline avian and bat use, raptor nesting and mortality information from proposed and existing wind developments. Unpublished report prepared for Bonneville Power Administration, Portland, OR by WEST, Inc., Cheyenne, WY. 124 pp.</p>
P12	P-32	<p>On page P-32, the application says that "approximately 56.82 acres of Category 6 agricultural habitat will be permanently impacted." Explain the inconsistency with the statement on page K-39 that "the project will preclude 70 acres of EFU land from use as a commercial agricultural enterprise."</p> <p>Response: The entire area within the lease boundary is designated EFU land in the Sherman County Zoning and Comprehensive Plan. The total permanent impacts within the lease boundary is 70 acres. In Exhibit P, impact areas within the lease boundary were mapped by habitat type, including CRP, shrub-steppe, and other non-agricultural areas. The land beneath these habitat types, although not used for agriculture, is considered EFU. The sum total of permanent impacts to all habitat types mapped in Exhibit P is 70 acres, but the permanent impacts to land mapped as Category 6 agricultural habitat is only 56.82 acres. The remaining habitat types account for the remaining 13.18 acres.</p>
P13	P-32	<p>Provide a proposed monitoring plan for potential impacts to avian species and bats.</p> <p>Response: "Klondike III Wind Project Wildlife Monitoring Plan", is still under revision and will be provided to the council by August 22, 2005.</p>
P14	ODFW comments	<p>Please respond to the matters discussed in the June 17, 2005 comment letter from ODFW.</p> <p>Response: Responses are included below:</p>
<p>ODFW: Page P-4, Table P-1: In the habitat category column, the descriptions for the Conservation Reserve Program fields (CRP) and Non-irrigated cropland (AG) are switched.</p>		
<p>Response: True, the descriptions for the Conservation Reserve Program fields (CRP) and Non-irrigated cropland (AG) should have been reversed in the ASC.</p>		
<p>ODFW: Page P-12, Table P-2 Mammals: Oregon does not have any Desert bighorn sheep. There are California bighorn sheep (<i>Ovis canadensis californicus</i>) in the John Day River basin.</p>		
<p>Response: California bighorn sheep should have been used in place of Desert bighorn sheep.</p>		

Req. #	Page reference	Request for additional information
		<p>ODFW: Page P-19, Table P-3: Impacts to Category 2 and 3 lands - ODFW believes that this table does not reflect the real direct and indirect permanent impacts that a string of wind turbines and roads will have on wildlife in the middle of CRP fields. The 6.92-acre total listed in this table only reflects the development footprint and does not include the permanent operational visual and noise disturbance and/or displacement impacts that this development will have on wildlife, particularly avian species. On pages P-22-23, studies were referenced that (1) showed "the area of reduced use was limited primarily to those areas within 328 feet (100 m) of the turbines"; and (2) "found that densities of male songbirds were significantly lower in CRP grasslands containing turbines than in CRP grasslands without turbines. Grasslands without turbines, as well as portions of grasslands located at least 591 feet (180m) from turbines, had bird densities four times greater than did grasslands located near turbines." It is ODFW's understanding that because of this potential displacement issue, the applicant for the Stateline Wind Energy Project is undertaking operational studies to discern the disturbance impacts to birds from the turbines. Based on this information, ODFW would be interested in discussing this project's potential displacement/disturbance impacts and related mitigation with the applicant and Oregon Department of Energy.</p> <p>Response: The applicant is proposing to conduct displacement studies similar to those that have been proposed for other wind projects. The proposed monitoring plan is will be provided to the Council by 8/22/05. The applicant and its consultants would be happy to discuss the monitoring with the Oregon Department of Energy and ODFW.</p>
		<p>ODFW: Appendix P-4, Page P-21, Waterfowl: This interim report tries to compare two studies on Canada goose winter use. The referenced studies found a difference of 3.79 birds/point count compared to 17.41 birds/30 min point count from previous studies at Klondike. In areas of winter wheat production, different goose use patterns appear from year to year depending on the amount of grain that is/was in production in any particular year. Fields that were in stubble will show a higher use pattern since the geese will seek out the left over grain in the stubble. So, the difference between the two point counts and the different use patterns may very likely relate to fields that were in production when the surveys were conducted.</p> <p>Response: It is very plausible that the differences in bird use between studies could have resulted from differences in the amount of grain available to birds. However, without information on the amount of grain in the fields, it is difficult to assess how likely it is that this explains the difference in waterfowl use.</p>
Exhibit Q - Threatened and Endangered Species		
Q1	Q-5	<p>Provide a description and an analysis of the results of the field surveys for threatened and endangered plants conducted in Spring 2005.</p> <p>Response: "An Investigation of Rare Plant Resources Associated with the Proposed Klondike III Wind Project, Sherman County, Oregon", Prepared by Eagle Cap Consulting Inc., Dated July 11, 2005, is attached as P-1.</p>
Q2	Q-5	<p>Provide a description and an analysis of the results of the field surveys for threatened and endangered wildlife conducted in Spring 2005.</p> <p>Response: "Summary of 2004-2005 Wildlife Surveys", Prepared by David Evans and Associates, Inc., dated July 28, 2005 is attached as P-2.</p>
Q3	Q-7	<p>What is the missing cross-reference at the top of page Q-7?</p> <p>Response: The missing cross-reference should read "Table Q-1".</p>
Q4	Q-8	<p>Identify "Frank Isaacs."</p> <p>Response: Frank Isaacs is the Senior Faculty Research Assistant, Oregon State University Cooperative Wildlife Unit. His resume includes: Bald eagles and management of their habitat. Particularly, annual surveys of Bald Eagles that nest in Oregon; annual midwinter counts of Bald Eagles in Oregon; detailed studies of Bald Eagle wintering areas; advice and critical review on management of Bald Eagle habitat; co-founder of the Oregon Eagle Foundation.</p>
Q5	Q-10	<p>Would perch-guards and conductor spacing be used on the overhead transmission line as mitigation for potential impacts to bald eagles and peregrine falcons?</p> <p>Response: No because anti-perch mechanisms are already in the design. The 230 kV power line design is already raptor-safe because the conductor and insulator design provides more that five feet of clearance phase to phase and phase to ground.</p>

Req. #	Page reference	Request for additional information
Q6	Q-12	<p>Have you had any discussions with ODFW regarding whether “programs to monitor the potential impacts to the individual listed species” should be required?</p> <p>Response: The standard monitoring requirements previously approved for similar wind power projects have been addressed. No further conversations with ODFW have been initiated to discuss monitoring beyond the standard requirements. The proposed monitoring plan for Klondike III for determining potential impacts to avian species and bats will be provided to the Council by 8/22/05.</p>
Q7	Appendix Q-2	<p>Will a Biological Assessment be done for the proposed BPA transmission line?</p> <p>Response: If the proposed BPA transmission line potentially impacts proposed or listed threatened or endangered species, a Biological Assessment will be prepared.</p>
Q8	Appendix Q-3, page 5	<p>How is “riparian” defined for the purposes of the field survey plan? Does it include the wetland areas identified in Exh J? How will the need for summer riparian area surveys be determined?</p> <p>Response: “Riparian” for the purposes of the field survey plan is defined by its ability to support hydrophytic vegetation during the summer flowering season. EEC identified no areas within the botanical analysis area that would require summer surveys based on these criteria. Wetland areas are identified as aquatic areas, and not riparian. In addition, the project will not impact wetland areas identified in Exhibit J.</p>
Exhibit S - Cultural		
S1	S-3	<p>What restrictions, if any, are there on development of areas within the Oregon Trail alignment?</p> <p>Response: The Oregon Trail alignment in Sherman County is not listed in the National Register of Historic Places nor is it a designated Goal 5 resource. The Trail’s designation as a National Historic Trail does not impose any restrictions on development on non-federal lands. No intact segments of the alignment were identified in areas that would be directly affected by project construction. There are therefore no restrictions on development within the Trail alignment in those areas that would be affected by the project.</p>
S2	Appendix S-1, page 4	<p>What is a strand “Waypoint?”</p> <p>Response: The “waypoints” are GPS coordinates for proposed turbine locations that were used to reference survey locations in the field. A revised report Figure 2 has been provided that shows all of the waypoints (see RAI Appendix Ex-S).</p>
S3	Appendix S-1	<p>There are several references to “Webfoot Road” but none of the maps show the location of this road; provide a map showing Webfoot Road.</p> <p>Response: Revised report figures have been provided that show the location of Webfoot Road (see RAI Appendix Ex-S).</p>
Exhibit T – Recreation		
T1	T-1, T-2	<p>The application includes the Sherman County Historical Museum, the Sherman County Fairgrounds and RV Park, Moro City Park, Wasco City Park and upland bird and deer hunting as “potentially important” recreational opportunities. Please discuss the basis for concluding that these opportunities are not “important.”</p> <p>Response: OAR 345-022-0100 prescribes factors the Council shall use in judging the importance of a recreational opportunity. Because the statute does not prescribe objective evaluation criteria such as a scoring system, the principal investigator and consultant team applied best professional judgment and consultation with Sherman County Planner Georgia Macnab to subjectively determine the relative importance of the potentially important opportunities identified in the analysis area.</p> <p>The Sherman County Historical Museum, Sherman County Fairgrounds and RV Park, Moro City Park, and Wasco City Park do not benefit from special designation or management status; upland bird and deer</p>

Req. #	Page reference	Request for additional information
		<p>hunting are managed according to statewide hunting regulations by Oregon Department of Fish and Wildlife. In comparison, the John Day River corridor is a designated Federal Wild and Scenic River, a State Scenic Waterway, State Wildlife Refuge, and is managed through two federal plans (i.e., John Day River Management Plan and Two Rivers Resource Management Plan).</p> <p>Regarding the museum and fairgrounds, the degree of demand was determined to be low to moderate based on apparent visitor use during field investigations and telephone conversations with Ms. Macnab. Although both are specific to Sherman County, neither offers outstanding or unusual qualities when compared to other facilities such as the Wasco County Historical Museum (The Dalles), The Museum at Warms Springs (Confederated Tribes or Warm Springs), the Wasco County Fairgrounds (Tygh Valley) or Gilliam County Fairgrounds (Condon). They are not considered rare because local museums and fairgrounds are common, as opposed to intact segments of the Historic Oregon Trail. They are not considered irretrievable or irreplaceable because both could be replaced if lost; that is, the museum and fairgrounds could be rebuilt and/or relocated if lost.</p> <p>Degree of demand for both city parks was determined to be low through field investigation and telephone conversations with Ms. Macnab. Wasco City Park has no facilities (e.g., restrooms); Moro City Park facilities include restrooms, picnic tables and a playground. None of these facilities are outstanding or unusual in quality. Although the parks are specific to Wasco and Moro, they are considered common because similar parks can be experienced in many rural towns and communities (e.g., Grass Valley City Park, Maupin City Park). The facilities could be easily replaced and/or rebuilt if lost.</p> <p>The degree of demand for hunting was determined to be low to moderate through conversations with Ms. Macnab and BLM Recreation Planner Heidi Mottl, both of whom indicated hunting in the analysis area primarily occurs in the John Day River corridor, which has been identified as an important recreational opportunity. Section T-3 supports a finding that the proposed facility would not have significant potential adverse impacts on the corridor; as such, it is implied that the proposed facility would not have significant potential adverse impacts on hunting in the corridor. The potential for hunting outside the river corridor is common, assuming private landowners are willing to grant permission. There are also ample opportunities for upland bird and deer hunting throughout the region beyond the analysis area. Hunting opportunities could be retrieved and/or replaced if lost.</p>
T2	T-5	<p>Operation of the wind facility itself is likely to attract visitors wanting to see the turbines. This could result in increased traffic. Do you plan to construct and maintain any interpretive center or “wayside” where visitors can park and view the facility?</p> <p>Response: No. Traffic levels are not high when compared to road capacity, as demonstrated in Exhibit U. Although some additional traffic may be generated by visitors who want to view turbines, this should not create transportation problems. (Mark coles, county road master, pers. Comm)</p>
T3	T-6	<p>On page T-6 and in earlier exhibits, the application refers to the “seen area analysis” that was conducted in preparation of the application, but the application does not discuss how this analysis was done or provide any documentation of the results of the analysis. Please provide a more complete explanation of the “seen area analysis” regarding the visibility of the proposed facility from the John Day River.</p> <p>Response: A description of the “seen area analysis,” “computer modeling,” and results will be provided in revisions to Exhibit R. This will include a more complete explanation regarding the visibility of the proposed facility from the John Day River.</p>
Exhibit U - Public Services		
U1	U-2	<p>The analysis area for impacts on public services includes the area within 30 miles from the site boundary, including communities that are in Washington. Exhibit U should discuss whether the construction and operation of the facility would have any adverse impact on the provision of public services for communities in Washington that are within the analysis area.</p> <p>Response: The applicant will provide information for local providers of services within 30 miles of the site boundary that are located in Washington.</p>
J2	U-9	<p>What is the support for the statement that Klondike I “was shown to not have any adverse impacts to</p>

Req. #	Page reference	Request for additional information
		<p>public and private service providers in the area”?</p> <p>Response: Support came from discussions with service providers in the area, as referenced in Exhibit U of the ASC, and a research paper written in 2004 by the Renewable Northwest Project titled “Windfall from the Wind Farm, Sherman County, Oregon.” The Klondike I project is specifically addressed in this document.</p>
U3	U-9	<p>What is the estimated tax revenue to local government? Include the basis and assumptions for that estimate.</p> <p>Response: Klondike I has contributed roughly \$300,000 per year to the local tax authority. Klondike II is three times the size of Klondike I, and thus is estimated to provide roughly \$900,000 to the local tax authority annually through the life of the project. Based on Klondike III’s larger project size, it is estimated to provide roughly \$2,000,000 to \$3,000,000 to the local tax authority on an annual average basis throughout its project life.</p>
U4	U-11	<p>What is the support for the statement that Sunrise Disposal “has adequate capacity to accommodate construction-related debris and service to the proposed project facility”?</p> <p>Response: Sunrise Sanitary Disposal and Waste Management Inc. were contacted via phone call to ascertain their respective abilities to accommodate waste from the construction and operation phases of the project. Sunrise Disposal currently provides garbage disposal to all of Sherman County and can provide 20, 30, and 40-yard boxes during construction as well as provide pickup during operation of the facility. Drop-off and pickup of waste can be accommodated with existing equipment. Sunrise does not operate a landfill, but instead transports waste to its transfer facility and then transports it to the Columbia Ridge Landfill, the regional landfill operated by Waste Management, Inc. Telephone and email correspondence with Waste Management, Inc. said the proposed project would not have an adverse impact on its facility, because of the landfill’s remaining capacity estimated to be at least 50 years (Palmer, pers. Comm).</p>
U5	U-12	<p>What was the basis for selecting the communities listed in Table U-3 as the “affected communities” as to housing supply?</p> <p>Response: Incorporated communities within 30 miles from the project were used as the basis for determining housing supply. Considering the relatively high vacancy rates in these communities, additional housing would not be required for new employees moving to the area and as a result would have no impact on existing public utilities because they would already be provided to those units. In the event a new employee lives outside of the city limits, that housing unit would likely use a private well and septic system and would have no impact on public utilities. Employees moving to the area are anticipated to live within the 30-mile study area boundary either in an incorporated city with public utilities or in a rural area with private septic and water systems.</p>
U6	U-14	<p>Provide a letter from the Sheriff confirming the statements: “In the event response is required at the Klondike III facilities, sheriff services can be accommodated with existing sheriff’s department resources.” and “No adverse impacts to the sheriff’s department are anticipated as a result of the proposed project.”</p> <p>Response: The Sherman County Sheriff’s Department has provided a letter, which is attached in Appendix U.</p>
U7	U-14	<p>What type of accidents at the facility would require “high angle rescue?” Should additional training be provided?</p> <p>Response: High angle rescue could occur in the event a person requires assistance on one of the towers or transmission lines. According to the North Sherman County Fire Protection District (Thomas, pers comm), one staff member has been trained in high angle rescue. The Fire District stated that no additional training is required.</p>
U8	U-15	<p>Provide letters from the North Sherman County Rural Fire Protection District and the Moro Rural Fire Protection District confirming that “the proposed project would not affect either department’s ability to provide fire protection or ambulance service for their service areas.”</p>

Req. #	Page reference	Request for additional information
		<p>Response: Sherman County Emergency Services coordinates the activities of the North Sherman County Fire Protection District, which provides fire suppression for the project area, and Sherman County Ambulance Service (a part of the Moro Rural Fire Protection District), which provides ambulance service for the project area. Sherman County Emergency Services contacted both the fire district and ambulance service provider and has provided a letter (attached in Appendix U) confirming the proposed project would have no impact on fire and ambulance services.</p>
Exhibit V - Waste		
V1	V-2 and W-1	<p>Provide support for the statement that leaving concrete pads and other equipment 3' below the surface upon retirement of the facility would allow agricultural activities to continue (with no adverse effect).</p> <p>Response: Three feet is common to the wind industry and is the depth used in applicant's experience throughout the U.S.</p>
V2	V-4	<p>The application says that waste management activities would be subject to "periodic inspections". Describe the periodic inspections, including who would perform the inspections and whether such inspections are required under any law or ordinance.</p> <p>Response: During construction, it will be the responsibility of the contractor to monitor waste generation and management activities, and ensure that wastes are recycled or disposed of in an appropriate manner.</p>
Exhibit W - Retirement		
W1	W-2	<p>Please provide more support for the estimated scrap value of steel. The link to www.grede.com is a home page for a foundry with locations in the east and Midwest. We could not find the online quote for the price of steel, and the application provides no support for concluding that the online quote is a valid indicator of the price of scrap steel. What is the history of scrap steel prices? Does the price fluctuate daily? Does the price vary geographically? What is the price of scrap steel at the market closest to Sherman County? Can you confirm that Blattner (or some other qualified contractor) would do the site restoration for \$908,000 and be willing to accept what it could get for the scrap steel to cover the balance of the \$7.27 million cost?</p> <p>Response: Current and historical pricing for scrap steel can be found on the Producer Price Index (PPI) for Commodities website at www.bls.gov by choosing Commodity Data. A hard copy of this data is included in Appendix W. The contractor chosen to perform the site restoration would subtract the value received for the scrap steel from the overall cost of restoration. Looking at the PPI table, scrap steel prices are at an all-time high in 2005. The national index should be fairly consistent with what can be expected for the market near Sherman County.</p>
W2	W-2	<p>Provide a site restoration bid from a contractor other than the contractor who is likely to do the construction if a site certificate is granted.</p> <p>Response: It should not be assumed that Blattner will "likely" be awarded the construction contract.</p>
W3	W-2	<p>The Blattner bid includes "revegetation" of 38 acres of land; however, Exhibit B states that the project would be located on 70 acres. Explain why only 38 acres would need to be revegetated upon retirement of the facility.</p> <p>Response: The total permanent impacts within the lease boundary is 70 acres. However, much of this area is agricultural land that will be put back into use for growing crops and will not require "revegetation".</p>
W4	W-2	<p>Although the cost estimate includes the cost of restoring the grade of the land to pre-construction levels, there does not appear to be any consideration whether topsoil would have to be brought to the site to restore soil productivity. Describe discussions the applicant has had with local landowners and farmers that addressing this concern. If topsoil would be needed to restore productivity, provide a cost estimate.</p> <p>Response: There should be adequate topsoil on the site or within close proximity to the site so that there should not be a significant increase in the restoration cost to account for shipment of topsoil.</p>

Req. #	Page reference	Request for additional information
Exhibit X – Noise		
X1	X-1	<p>The application states that it was “assumed” that the “noise levels” would be higher with the GE turbine than with the Vestas turbine. Please provide documentation of the maximum sound power level “established by IEC 61400-11 (version 2002-12)” for each turbine.</p> <p>Response: A comparison of the sound levels between the GE and Vestas turbines was not made in the TW report. However, the GE data was used because it was more precise and appears to be conservative. The data from the GE Technical Documentation specifies a maximum sound power level of 104 dBA ±2 dBA with a footnoted reference to IEC 61400-11 (version 2002). The data from the Vestas documentation is not as detailed but shows a sound level curve reaching a maximum of approximately 103 dBA. Documentation was not included in the report because the GE documentation explicitly states that it is confidential and can not be copied without written consent from GE Energy (the Vestas documentation does not have similar language).</p>
X2	X-5	<p>Explain how the calculation of the “36-dBA contour” was done. Provide a map showing the boundary of the 36-dBA contour.</p> <p>Response: The distance to the 36 dBA contour was determined by modeling a string of turbines (17 in a row) using the 106 dBA sound power level and calculating the perpendicular mid-point distance from the turbines such that the sound level is 36 dBA. This distance was determined to be 0.8 miles (see Appendix X model output). A receptor perpendicular to a string of turbines would be the worst off-site impact location relative to turbine string geometry. A 0.8 mile contour around the lease boundary (not the turbines) was examined for sensitive receivers. The lease boundary adds at least another 0.1 mile, resulting in a conservative approach. A map of the 36 dBA (0.8 mile) contour is attached in Appendix X.</p>
X3	X-5	<p>Provide the BPA noise specification data for the transformers. Would the addition of the transformer noise to the noise generated by the turbines affect the estimated sound pressure level at any of the noise sensitive properties? Provide a map showing the locations of the transformers.</p> <p>Response: The BPA noise specification data for the transformers was taken from BPA’s posted response to Ms. Dulane Crist’s April 29 public meeting letter, dated August 3, 2004. BPA was contacted on March 10, 2005 and BPA confirmed the 70 dBA noise specification at a distance described as “at the transformer”. A distance of 3 feet from the transformer was used to conservatively estimate the distance for the specification.</p> <p>The addition of the transformer noise to the noise generated by the turbines will not affect the estimated sound pressure level at any of the noise sensitive properties. The transformer locations are shown in Appendix X and are labeled as “proposed substations”.</p>
X4	X-5	<p>Explain the difference between “maximum sound power level at cut-out speed” as used in the analysis and “wind speed corresponding to the maximum sound power level established by IEC 61400-11 (version 2002-12)” as required under OAR 340-035-0035. Provide documentation of the sound power level for the GE and Vestas turbines over the entire range of wind speeds from “cut-in” speed and the “wind speed corresponding to the maximum sound power.”</p> <p>Response: There is no difference between “maximum sound power level at cut-out speed” as used in the analysis and “wind speed corresponding to the maximum sound power level established by IEC 61400-11 (version 2002-12)” as required under OAR 340-035-0035. The data from the GE Technical Documentation specifies a maximum sound power level of 104 dBA ±2 dBA with a footnoted reference to IEC 61400-11 (version 2002). The sound power data for the GE turbines range from less than 96 ±2 dBA at a wind speed of 3 m/s to less than or equal to 104 ±2 dBA at a wind speed of 7 m/s (cut-out). The data from the Vestas documentation is not as detailed but shows a sound level curve beginning at approximately 101 dBA at a wind speed of 3 m/s and reaching a maximum of approximately 103 dBA at a wind speed of 7 m/s. Documentation was not included in the report because the GE documentation explicitly states that it is confidential and can not be copied without written consent from GE Energy (the Vestas brochure does not have similar language).</p>
X5	X-5 and Appendix	<p>It appears that the noise effects from the transformers were calculated separate from the noise effects of the turbines. The noise standard applies to all noise generated by the wind facility. Provide an analysis of</p>

Req. #	Page reference	Request for additional information
	X-1	<p>whether including the transformer noise would change the boundary of the 36-dBA contour and whether this would affect any additional noise sensitive properties.</p> <p>Response: The addition of the transformer noise to the noise generated by the turbines will not affect the distance to the 36 dBA contour nor the estimated sound pressure level at any of the noise sensitive properties. There are a maximum of two transformers next to each other with a cumulative sound level of 73 dBA at 3 feet; their corresponding distance to the 36 dBA contour was calculated to be 209 feet, less than the 0.8 mile buffer area examined for sensitive receivers. The closest receptor to a transformer is R7. The transformer noise would be approximately 13 dBA at R7 which is not enough to contribute to the sound pressure level at R7.</p>
X6	X-5 and Appendix X-1	<p>In calculating the 36 dBA contour:</p> <ol style="list-style-type: none"> 1. Was it assumed that all of the proposed wind facility's turbines would be operating? 2. Was the noise from all turbines and transformers included in the calculation? 3. Were noise levels "over the entire range of wind speeds" (from cut-in to the speed corresponding to the maximum sound power level) considered in the analysis? 4. Were the noise levels at the appropriate measurement points predicted following procedures established by IEC 61400-11 (version 2002-12)? <p>Response:</p> <ol style="list-style-type: none"> 1. Yes, the analysis considered all turbines emitting a 106 dBA sound power level simultaneously. 2. Yes. 3. No, only the 106 dBA maximum sound power level was used, resulting in a conservative analysis. 4. No measurements were performed. An assumed level of 26 dBA L₅₀ was used for background, manufacturer's supplied noise data (referenced to IEC 61400-11) was used for the turbine sound levels, and BPA's published data was used for transformer sound levels.
X7	X-6	<p>Identify the towers that would have to be eliminated to meet the ambient degradation test if a landowner waiver is not obtained.</p> <p>Response: No towers would have to be eliminated. Some towers would potentially need to be taken off-line at maximum wind speeds, or a background noise study would need to be completed to quantify ambient L₅₀ as a function of wind speed to determine if the predicted impacts are a function of the conservative nature of the analysis. The towers that potentially need to be off-line at maximum wind speeds to meet the ambient degradation test if a landowner waiver is not obtained include the following:</p> <p>R4: Wpt 59, 60, 61, and 62</p> <p>R5: Wpt 58</p> <p>R6: Wpt 89, 90, 91, 92, 93, 94, 97, 98, 99, 100, 101, and 102</p> <p>R7: Wpt 102, 127, 128, 129, 130, 131, 132, 136, 137, and 138</p>
Exhibit AA - EMF		
AA1	AA-1	<p>Provide electric and magnetic field analysis for the underground transmission lines in addition to the aboveground transmission line.</p> <p>Response: Response is attached as Appendix AA-1.</p>
AA2	AA-2	<p>Under OAR 345-024-0090(2), the Council must decide whether the applicant "can design, construct and operate the proposed transmission line so that induced currents resulting from the transmission line and related or supporting facilities will be as low as reasonably achievable." Provide an analysis of the risk of induced currents from the proposed transmission lines and any mitigation actions proposed.</p>

Req. #	Page reference	Request for additional information
		Response: Response is attached as Appendix AA-2.
AA3	AA-2	Provide support for the conclusion that the overhead transmission line is not likely to cause radio interference. Response: Response is attached as Appendix AA-3.





**DAVID EVANS
AND ASSOCIATES INC.**

October 19, 2005

John White, Project Officer
Oregon Department of Energy
625 Marion Street NE
Salem, OR 97301

SUBJECT: KLONDIKE III WIND PROJECT - RESPONSE TO RAI #2

Dear John:

Enclosed is our response to RAI #2, including Appendices and a revised Exhibit L. We would also like to take this opportunity to provide additional information related to several additional topics discussed at our September 14, 2005 meeting: authorization of turbine sites vs. a corridor, the request for Washington ground squirrel surveys on the site, and the need for a Goal 3 exception.

Authorization of Turbine Corridor

Given the need for micro-siting wind turbines to achieve optimum energy output, PPM requests that the Council authorize flexible placement of turbines within the 300-foot corridors that have been studied, rather than at specific points. Within these corridors, thorough investigations of cultural resources, wetlands, rare plants, and sensitive habitats have been completed and documented in the ASC. None of these resources has been documented in wheat production areas. Therefore, in dryland wheat, PPM requests the flexibility to site turbines anywhere within 150 feet of the centerline.

In non-wheat production areas, PPM requests the flexibility to move turbines up to 50 feet from the centerline without further analysis. The impact of turbines within the corridors on sensitive species and habitats has been evaluated in the ASC. While moving turbines has the potential to bring the turbines closer to some of the resources, we believe the impact analysis would still be appropriate with movement of turbines up to 50 feet from centerline. If a turbine would need to be moved more than 50 feet from the location shown on project maps in the ASC, additional surveys or analysis could be done prior to construction.

Request for Washington Ground Squirrel Survey

To clarify information in Exhibit P, the attached Oregon Natural Heritage Information Center (ONHIC) data (1979) showed a Washington ground squirrel sighting east of the John Day River, within 2 miles of the site. Attached are the ONHIC data and a map that shows the location of the sighting. In addition, we have contacted Keith Cole of ODFW. In a conversation on September 28, 2005, he confirmed that no known sightings of Washington ground squirrel have occurred west of the John Day River, although a related ground squirrel was apparently sighted at the Orion Energy project area to the north, within Sherman County.

John White, Project Officer
October 19, 2005
Page 2



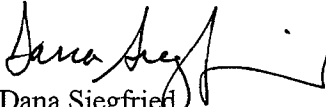
Goal 3 Exception

Review of Oregon statutes, administrative rules and recent Oregon court opinions leads the Applicant to conclude that 63.82 acres of land will be permanently removed from the agricultural land inventory of the County in order to construct and operate the proposed energy generation facilities, roadways, operation and maintenance building and electric substations. The 63.82 acres exceed the 20-acre threshold under OAR 660, Division 33 which triggers the need for a Goal 3 exception. Therefore, the Applicant requests that the Council review and approve the request for a Goal 3 exception that Applicant has submitted to the Council, including supporting evidence included in the ASC application and Applicant's responses to the Department's Requests for Additional Information.

Please call me at (503) 499-0369 if you have any questions or need clarification of the information in RAI #2.

Sincerely,

DAVID EVANS AND ASSOCIATES, INC.


Dana Siegfried
Regulatory Specialist

Copies: Jesse Gronner, PPM Energy
David Filippi, Stoel Rives LLP

Attachments/Enclosures: Response to RAI #2 and Appendices
Washington Ground Squirrel data

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Klondike III Wind Project

Response to Second Request for Additional Information (RAI) - September 15, 2005

Req. #	Page reference	Request for additional information
Exhibit B - Facility		
B6 follow-up	B-11	<p>In your response to RAI B6, you gave different lengths for underground transmission line in county right-of-way (18.7 miles and 18.3 miles). Which is correct?</p> <p>Response: 18.3 miles of transmission line will be within county road right-of-way.</p>
B7 follow-up	B-12	<p>In your response to RAI B7, you proposed a three-year "window" for beginning construction. The Council has generally required construction of energy facilities to begin within two years after the date of the site certificate, but we understand that the wind industry faces some constraints that affect when a project can be built. Please describe the constraints that KIII faces that provide a justification for a wider construction window. In addition, we note that on page B-12 you have proposed to complete construction in less than 12 months after construction begins. For gas-fired power plants, the Council has generally allowed a three-year construction window (setting a construction completion deadline at five years after the date of the site certificate, for example). In responding to RAI B7, please address the deadline for completion of construction of the proposed Klondike III Wind Project.</p> <p>Response: The Klondike III Wind Project will transmit power via a new proposed Bonneville Power Administration (BPA) transmission line. BPA must complete the following tasks before the transmission line is operational: locate the exact route, negotiate land agreements, prepare baseline studies, publish a Draft Environmental Impact Statement (EIS), respond to comments, and prepare a Final EIS. PPM Energy has little control over the schedule of this third-party process.</p> <p>If the transmission line is not complete within PPM Energy's proposed timeframe, which would have the Klondike III Wind project operational by the end of 2007, then the Council would have to evaluate an amendment to extend the KIII construction timeframe. In order to avoid this, PPM Energy proposes to begin construction within 3 years from the date of the site certificate, and then to complete construction within 2 years from the beginning of construction, for a total construction window of 2 years.</p>
B8	B-9	<p>Provide a description of number, type, dimension and location the permanent meteorological towers that would be constructed as a part of the facility.</p> <p>Response: The three meteorological towers will be un-guyed steel towers, approximately 80 meters high with an equilateral triangle base, each side of which will be roughly 25 feet long. The locations of the towers are shown as purple crosses on Figure C-2 of the ASC.</p>
B9	B-3	<p>Clarify the statement that all or part of the collector system may be aboveground due to "geotechnical conditions or other engineering considerations." Although we would prefer that all of the 34.5 kV collector system be underground, we will consider appropriately limited flexibility to allow construction of part of the system aboveground where necessary.</p> <p>Response: Examples of specific conditions that would make it environmentally or economically advantageous to run portions of the collection system above ground include:</p> <ul style="list-style-type: none"> • Steep terrain making the use of backhoes and trenching machines unsafe • Stream and wetland crossings where an above ground line avoids or minimizes environmental impacts, • Soil with low thermal conductivity preventing adequate heat dissipation from the conductor, and • Very rocky conditions that significantly increase trenching costs.

Req. #	Page reference	Request for additional information
B10	B-10 and Table P-3	<p>In addition to the 19 miles of new roads described at the top of page B-10, what is the length of the existing road segments that would be widened, as shown on Figure C-2. We note that, in addition to the segments running south from the proposed new O&M building, Figure C-2 shows small segments of widening along McDonald Ferry Lane. In addition to providing the total length of widened road segments, be sure to include the widened area in the calculation of the total area of permanent impact on Table P-3.</p> <p>Response: Approximately 4 miles of county road will be widened, resulting in permanent impacts of 7.7 acres. These impacts were included in the original Table P-3.</p>
Exhibit K - Land Use		
K7 follow-up	K-14	<p>In your response to RAI K7, you state that washdown of concrete trucks would occur only at "contractor-owned batch plants." Considering the Council's definition of "related or supporting facilities," explain how the impacts of the batch plants would be mitigated. Alternatively, provide a basis for the Council to conclude that the batch plants are not related or supporting.</p> <p>Response: Hood River Sand & Gravel has an existing concrete batch plant centrally located within the Klondike III project area. This plant was used to serve construction needs of both the Klondike I and Klondike II wind projects and is expected to be a potential service provider to Klondike III as well as other proposed construction projects in the vicinity of Klondike III. Because this plant is an existing facility that has served and could later serve other projects, it is not a related or supporting facility.</p>
Exhibit L - Protected Areas		
L3	L-1	<p>Provide an analysis of any protected areas in the State of Washington that are within the 20-mile analysis area.</p> <p>Response: An analysis of State of Washington protected areas within the 20-mile analysis area is attached as Revised Exhibit L in Appendix L.</p>
L4	L-2	<p>Provide an analysis of whether noise from construction or operation of the proposed facility would be audible at any of the protected areas within the analysis area.</p> <p>Response: Noise levels from the wind turbine array were modeled at the three closest points on the boundary of the protected area (John Day Wildlife Refuge), approximately 0.8 miles away. No topographic shielding was included, making the model conservative. Sound levels from the turbines when all turbines are operating at the maximum sound power level are estimated to range between 27 and 30 dBA. This results in overall levels of 30 to 31 dBA when added to an assumed background level of 26 dBA. The increase over background levels would be 4 to 5 dBA during quiet background periods. An increase of 4 to 5 dBA is audible. At these low overall sound levels, the turbines might be audible in quiet areas away from flowing water during low wind conditions. However, it is probable that the sound could not be specifically identified to the source without visual cues.</p>
L5	L-3	<p>Are the areas along the John Day River from which portions of the facility would be visible (page L-4) located within five miles of the site? If so, what is the distance? Describe the visual impact of the facility from these locations.</p> <p>Response: Yes, areas along the John Day River from which portions of the facility would be visible are within five miles of the site. Distances from the proposed turbines that would be visible from the river are listed in Table R-2 of Revised Exhibit R, September 16, 2005. The visual impact of the facility from these locations is described on pages R-11 through R-13 of Revised Exhibit R, September 16, 2005.</p>

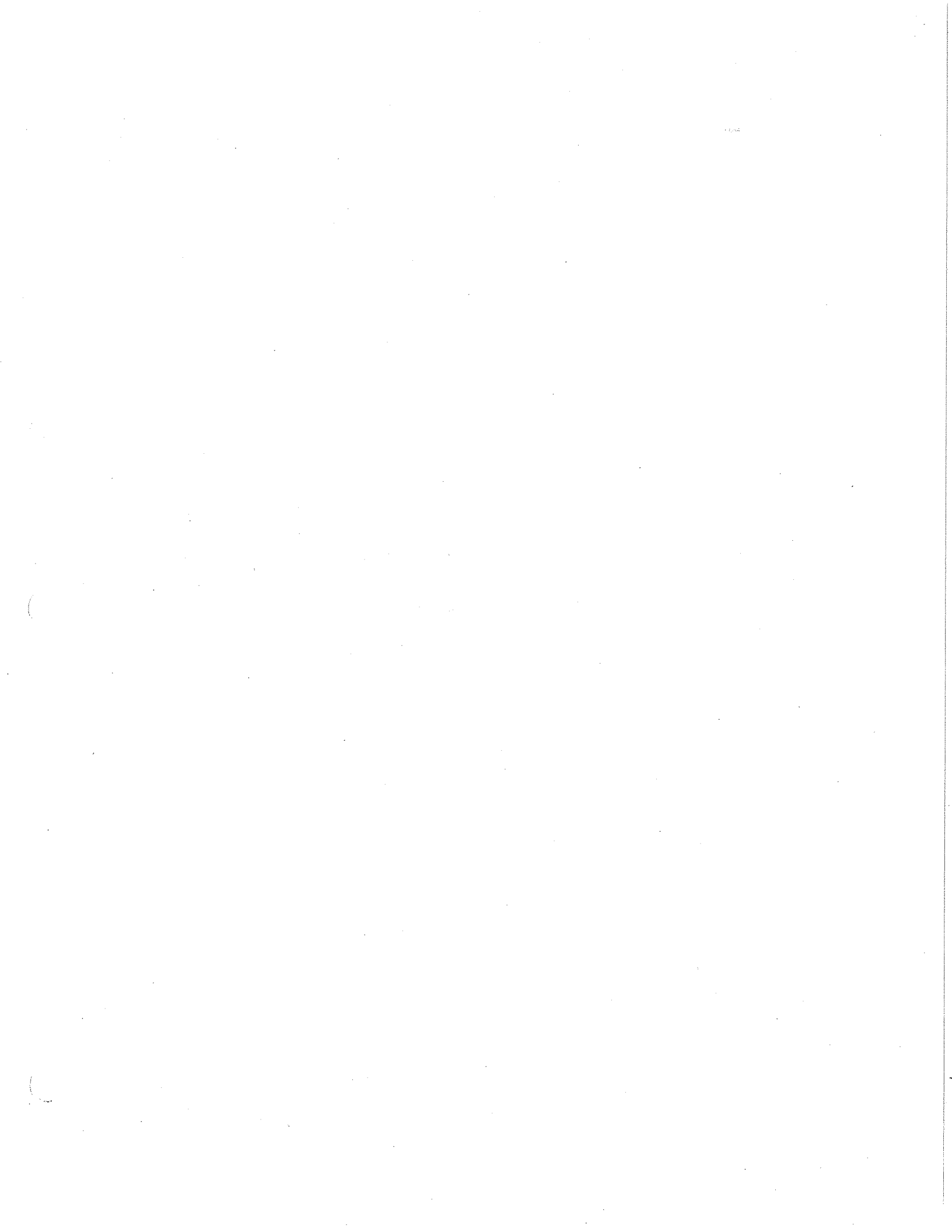
Req. #	Page reference	Request for additional information
Exhibit M - Financial Assurance		
M4	M-1	<p>If a letter of credit, rather than a bond, is proposed as the financial assurance instrument, provide a letter showing evidence that the applicant "has a reasonable likelihood of obtaining" the letter of credit. We would suggest that the issue of the appropriate financial assurance amount be addressed before you seek this letter from the financial institution. If the appropriate amount is more than \$2 million, then we would need a new letter in support of a bond in the higher amount (to replace the letter in Appendix M-2).</p> <p>Response: Applicant is not considering a letter of credit as the financial assurance instrument at this time.</p> <p>The applicant has obtained an estimate from an experienced contractor showing the anticipated value of scrap would be higher than originally estimated. Therefore, the proposed bond amount of \$2 million should be adequate for facility retirement.</p>
Exhibit O - Water		
O1 follow-up	O-1	<p>A substantial amount of water would be used for dust suppression and concrete mixing during construction of the proposed facility. To issue a site certificate, the Council must find that the facility "complies with all other Oregon statutes and administrative rules identified in the project order, as amended, as applicable to the issuance of a site certificate for the proposed facility" (ORS 469.503(3)). The project order addresses the need under Oregon law for a valid water right. In your response to RAI O1, you state that you are "confident" that there is sufficient water available, based on PPM's experience. The Council will need better evidence that KIII would be able to acquire sufficient water from a source having a water right that covers the use.</p> <p>Response: For a 165 turbine project, total water use will be approximately 18 million gallons during the construction period for concrete and road dust control. While the applicant anticipates that it will obtain water from a variety of sources, including those identified in Exhibit U in the April 2005 Application for Site Certificate, the applicant has received a letter from Northwest Aluminum Company, in which Northwest Aluminum Company indicates that it can make available to the applicant the entire 18 million gallons of water that will be required for project construction from Northwest Aluminum Company's wells located in The Dalles, Oregon. The letter confirming available water capacity is attached as Appendix O.</p>
Exhibit P - Habitat		
P15	P-19	<p>Provide a revised Table P-3. Include temporary construction-related impacts to Category 2 habitat and Category 3 upland tree habitat. Include the area of turn-around areas to be located at the ends of turbine strings (as you mentioned in your response to RAI K2). Address the inconsistency between the 63.82 acres of permanent impact shown on Table P-3 with the statements on pages C-1, I-2, I-3, K-39 and elsewhere that the area of permanent disturbance would be 70 acres.</p> <p>Response: Revised Table P-3 is attached in Appendix P, and includes 18 temporary construction turnarounds that are 400 feet in diameter (approximately 2.9 acres each; 50.8 acres total). The turnarounds were located based on the required turning radius for the construction equipment, and were sited to avoid project elements as well as better quality habitat when possible.</p> <p>The temporary construction-related impacts associated with the turnarounds to Category 2 habitat will be 1.25 acres, and no temporary construction-related impacts to Category 3 upland tree habitat will occur. Early in project design, permanent project impacts were calculated conservatively at 70 acres, and this figure was quoted in the Exhibits identified</p>

Req. #	Page reference	Request for additional information
		above and elsewhere. Refinement of the project design resulted in a disturbance area that is actually 63.82 acres. This is the permanent impact acreage that the Department should rely on in evaluating the project.
P16	P-32	<p>Explain or rephrase the statement on page P-32 that “performing repair activities during operations” would be a method of minimizing impacts to Category 6 habitat.</p> <p>Response: We believe that a line was inadvertently omitted in the ASC. It was intended to convey that during operations, after agricultural areas have been restored, repair and maintenance activities for the project would be conducted on the existing roads or other permanently impacted areas, not on agricultural fields.</p>
Exhibit Q - Threatened and Endangered Species		
Q9	Q-1	<p>Explain the differences between Table 1 on page Q-1 of the application and Table 1 in the <i>Klondike III Wind Project Summary of 2004-2005 Wildlife Surveys</i> at p. 7. The “new” list shows no federal or state listed threatened or endangered species. Explain how “target species” were defined. Clarify whether bald eagle, peregrine falcon and Washington ground squirrel are the only threatened or endangered animal species (excluding fish) that have a potential to occur in the analysis area.</p> <p>Response: Based on USFWS and ONHRIC database results (Table 1, p. Q1), bald eagle, peregrine falcon and Washington ground squirrel are the only threatened or endangered animal species (excluding fish) that have a potential to occur in the analysis area. In addition, as mentioned in the Final Biological Protocol, “To address these species, DEA will document any potential bald eagle or peregrine falcon roosting, nesting, or foraging habitat within the project vicinity as part of the fish and wildlife habitat evaluation and the raptor nest survey.”</p> <p>The table in the <i>Summary of 2004-2005 Wildlife Surveys</i> displays those species for which habitat is currently present within the study area. Federal or state listed threatened or endangered species without habitat were not in the “new” list, because no habitat was present. As mentioned in the <i>Summary of 2004-2005 Wildlife Surveys</i>, “Prior to conducting surveys, DEA coordinated with ODFW and USFWS to develop the target species list...” This means that DEA and the agencies determined, based on local knowledge, site visits, very high-resolution aerial photography at an acquisition scale of 1:400, and best professional judgment, whether habitat for the species in the “old” list currently exists on-site, and if so, whether specific surveys not included in the Special Status Species surveys and Raptor surveys were warranted.</p>
Exhibit V - Waste		
V1 follow-up	V-2 and W-1	<p>Provide a letter supporting the statement that leaving concrete pads and other equipment 3’ below the surface upon retirement of the facility would allow agricultural activities to continue (with no adverse effect). This letter should come from a person with appropriate expertise (for example, Agriculture Extension agent, Soil District staff or local farmers).</p> <p>Response: See letter from Sandy Macnab of the OSU Extension Service dated September 29, 2005, attached as Appendix V. Because plowing depths are no more than 12 inches, leaving concrete pads and other equipment 3 feet below the surface will allow normal farming operations to resume.</p>
V2 follow-up	V-4	<p>Describe any waste management program or inspections that would occur during facility operation.</p> <p>Response: The operations personnel will be responsible for the waste management program, ensuring that solid waste is disposed of in dumpsters, and any hazardous wastes are properly disposed of in accordance with applicable rules.</p>

Req. #	Page reference	Request for additional information
Exhibit W - Retirement		
W1 follow-up	W-2	<p>Please provide more support for the estimated scrap value of steel. Respond to the questions presented in the memo from John Larson, dated September 4, 2005.</p> <p>Response: A revised estimate for facility removal from D. H. Blattner & Sons is attached as Appendix W. This estimate shows what an experienced industry contractor believes to be the forward price of salvaged steel, which is higher than the applicant's original estimate.</p> <ol style="list-style-type: none"> 1. The breakdown of assumed 160 ton/WTG is roughly 30% nacelle and 70% tower. 2. D. H. Blattner & Sons is a reputable wind industry contractor and has deducted an assumed salvage value of \$260/ton in its cost estimate attached as Appendix W. The applicant has used a more conservative assumption of \$241/ton in the application. This methodology is consistent with applicant's experience in other regions where a decommissioning bond is required. 3. The decommissioning cost for the overhead transmission line was obtained from an electrical construction contractor and is its conservative estimate of total removal cost.
W3 follow-up	W-2	<p>Explain how the area of revegetation (38 acres) was calculated. Does this area include areas that would be temporarily affected by demolition equipment and vehicle movement during site restoration activities? Explain whether there would be a need to compensate owners for any impacts on agricultural areas, if these areas are not "re-vegetated."</p> <p>Response: As described on page W-2, "reclamation procedures... will likely include re-grading to restore soil and original contours and revegetation of <i>all disturbed area</i> (emphasis added) with native plant seed mixes or agricultural crops, as appropriate, based on the use of surrounding lands."</p> <p>Therefore, all temporarily affected areas would be re-vegetated, including agricultural areas. If agricultural areas could not be re-vegetated in a manner that would result in equal economic value (due to crop timing), landowners would be compensated monetarily.</p>
W4 follow-up	W-2	<p>Discuss the issue of topsoil availability with local farmers and address whether there is sufficient topsoil that could be removed from adjacent areas to restore the facility areas without compromising the productivity of these adjacent agricultural areas.</p> <p>Response: See letter from Sandy Macnab, Sherman County Crops Agent of the OSU Extension Service, dated September 29, 2005, attached as Appendix V. Farmers and others routinely move soils around their sites for various purposes, without adversely affecting their ability to farm. In addition, if extra fill dirt is needed, there are several areas of stored fill that could be available to restore the site.</p>
Exhibit X - Noise		
2 follow-up	X-5	<p>Does your response to RAI X2 mean that all of the residences within the lease boundary would experience an increase in ambient sound pressure level greater than 10 dBA?</p> <p>Response: No. The purpose of the contour distance calculation is to define the possible area of impact. A detailed modeling analysis was performed for all receivers within the 36 dBA contour (the area of possible impact) and the results are presented in the noise analysis. Only a portion of the receivers showed levels of 36 dBA (a 10 dBA increase over the assumed 26 dBA) or greater.</p>

Req. #	Page reference	Request for additional information
X6 follow-up	X-5 and Appendix X-1	<p>Regarding your response to RAI X6(3), without having an analysis of sound levels at the receptors "over the entire range of wind speeds" (as required by the regulation), we cannot determine whether the facility could ever be operated without violating the noise standards (in the absence of waivers from all affected property owners).</p> <p>Response: Please see the discussion in response to X8.</p> <p>Regarding your response to RAI X6(4), the reference to IEC 61400-11 (version 2002-12) comes from OAR 340-035-0035(1)(b)(iii)(IV), which does not require measurements. Your response is unclear whether the requirements of the regulation were followed.</p> <p>Providing a response to RAI X8 below may be sufficient to respond to these concerns.</p> <p>Response: The regulations were followed exactly and the noise analysis was conservative because it was based on the maximum sound power levels. OAR 340-035-0035(1)(b)(B)(iii)(IV) states: "For purposes of determining whether a proposed wind energy facility would satisfy the ambient noise standard where a landowner has not waived the standard, noise levels at the appropriate measurement point are predicted assuming that all of the proposed wind facility's turbines are operating between cut-in speed and the wind speed corresponding to the maximum sound power level established by IEC 61400-11 (version 2002-12). These predictions must be compared to the highest of either the assumed ambient noise levels of 26 dBA or to the actual ambient background L10 and L50 noise level, if measured. The facility complies with the noise ambient background standard if this comparison shows that the increase in noise is not more than 10 dBA over this entire range of wind speeds."</p> <p>The appropriate measurement point is defined under OAR 340-035-0035(3)(b) and was assumed to be 25 feet toward the wind turbines from the residence. IEC 61400-11 specifies the method to be used by the turbine manufacturers to establish sound levels from operating turbines. Data from GE on noise levels from turbines operating between cut-in speed and cut-out speed (which is the speed corresponding to the maximum sound power level) were used in the predictions. The GE data specifically reference IEC 62400-11 (version 2002-12 (see Appendix X – Technical Specification – Noise Emission Compliance)). It was assumed that all turbines were operating at the maximum sound power level. The predicted levels were compared to an assumed ambient background level of 26 dBA. The results were shown in the noise analysis and exceed the 10 dBA increase at four receivers when all turbines are operating at the maximum sound power level.</p>
X8	X-3	<p>Respond to the questions in the e-mail from Kerrie Standlee, dated September 2, 2005, regarding noise impact analysis.</p> <p>Response: The responses are attached as Appendix X.</p>
X9	Appendix X-1, page 10	<p>Does "estimated noise level" on Table 4 mean the noise generated from operation of the wind facility (assuming all turbines in operation) or is it an estimate of the total ambient sound level with the turbines operating? Is the "maximum sound power level at cut-out speed" the same as the maximum sound power level overall? The text below the table appears to mix the ambient degradation test with the Table 8 test.</p> <p>Response: It is the noise generated from the operation of the wind facility. For the four receivers with sound levels predicted to exceed the 10 dBA increase criteria, it is also the estimated total ambient sound level as the 26 dBA background would not contribute to overall levels once operating levels exceed 10 dBA over background. Yes, the maximum sound power level at cut-out speed is the maximum sound power level overall.</p>

Req. #	Page reference	Request for additional information
Exhibit AA - EMF		
AA2 follow-up	AA-2	<p>Explain last sentence of your RAI response AA2.</p> <p>Response: The response was intended to indicate that mitigation for underground magnetic fields is only appropriate and should only be required when there is an adjacent underground pipeline. There are no such pipelines adjacent to the proposed KIII collector system. Therefore, mitigation should not be necessary.</p>
Exhibit BB - Other Information		
BB1	BB-1	<p>Respond to the requirements of OAR 345-024-0010 (Public Health and Safety Standards for Wind Energy Facilities).</p> <p>Response: To meet this criteria, the Council must find that the applicant:</p> <p>(a) Can design, construct and operate the facility to exclude members of the public from close proximity to the turbine blades and electrical equipment;</p> <p>Response: The project is designed so that substations, including transformers and other electrical equipment, are not accessible to the public. Other electrical equipment will be inside the turbines, which have locked entry doors and thus to which the public would not have access. The turbine blades are also only accessible from within the secured turbine towers. No advertising will be used on any part of the facility. Warning signs will be posted as required by law for safety of the public.</p> <p>(b) Can design, construct and operate the facility to preclude structural failure of the tower or blades that could endanger the public safety and to have adequate safety devices and testing procedures designed to warn of impending failure and to minimize the consequences of such failure.</p> <p>Response: The project is designed so that towers and blades are a minimum of 400 feet from public roads. In the extremely unlikely event of a tower failing, public areas will not be affected.</p> <p>Construction procedures include manufacturer's requirements for handling towers and blades to prevent damage that could lead to failure. These procedures will be scrupulously followed during construction.</p> <p>The applicant will have a rigorous operational safety monitoring program. Blades will be inspected for signs of wear on a regular basis. All turbines have self-monitoring devices linked to computer operated sensors at the O&M building to alert operators.</p>





**DAVID EVANS
AND ASSOCIATES INC.**

DATE: November 11, 2005
TO: John White
FROM: Dana Siegfried
SUBJECT: Response to October 28, 2005 E-mail
PROJECT: Klondike III Wind Project
PROJECT NO: PPME00000001
COPIES: Jesse Gronner

John,

In response to your October 28, 2005 e-mail, we offer the following responses:

1. Because detailed geotechnical studies have not yet been completed, it is not possible to determine the precise location(s) where above ground collector system may be necessary. Therefore, in order for DOE to evaluate the potential impact for above ground collector lines, PPM proposes that no more than 15% of the collector system (or approximately 4.5 miles) be above ground. The above ground collector system would be placed only in developed or agricultural areas. In no case would an above ground collector, which is a 34.5 kV system, be closer to a residence than ¼ mile, eliminating potential EMF impacts.
2. We are working with DEQ to obtain the required letter; we understand this is not a completeness issue.
3. We are arranging a site visit to inspect test pits with the county health inspector for the week of November 21, 2005, and look forward to a letter from him shortly afterward.
4. Potential Noise Impacts on John Day Wildlife Refuge

Construction of the Klondike III Wind Project would cause localized, short-duration noise. Levels from construction activities can be expected to range from approximately 70 to 100 dBA at a distance of 50 feet from the activities (EPA 1971). OAR 340-035-0035(5)(g) specifically exempts construction activity from regulation. Therefore, by regulatory definition, there will be no significant construction noise impacts. However, OOE expressed concern over potential impacts to wildlife at the John Day Wildlife Refuge from construction noise.

At 50 feet, the highest dB levels caused by turbine construction would be 98 dB (EPA 1971). The closest construction area for Klondike III lies at least 0.8 miles from the closest portion of the refuge. This distance is from the end of a turbine string, and the remaining turbines would be further away. At a distance of 0.8 miles, even the loudest construction activity (98 dB) would create at the very most, 59 dB. Assuming the usual ground effect interference or topographic

interference, the noise would be between 39 and 49 dB (Moore, pers. comm. 2005). Therefore the most conservative estimate, 59 dB, would create less noise impact than the sound of normal conversation from three feet away, which is 60 dB.

It is highly unlikely that this level of noise would cause disturbance to any wildlife species in the area. In addition, duration of construction impacts would be extremely short. Entire turbine strings can be assembled in less than a month, and the majority of the louder impacts such as land clearing, grading, and drilling would occur early in the process. Later activities from materials handling and stationary equipment peak in the upper 80s dB at 50 feet. This would result in even lower sound thresholds at a distance of 0.8 miles and greater.

U.S. Environmental Protection Agency (EPA). 1971. Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances.

Moore, Martha. 2005. Personal communication on November 8, 2005. Noise Analyst for TW Environmental, Inc. (TWE), Portland, Oregon.

5. PPM has released a metals industry consultant to produce an independent report and would like to provide a revised proposal based on the conclusions of that report, which will provide an estimate of current scrap value as well as a methodology for an escalation over time. PPM will work to provide this to the DOE prior to the week of November 28, 2005
6. The application states that the permanent impacts of the project are 63.82 acres. We agree that the restoration costs associated with the project should reflect this amount instead of the 38 acres quoted by Blattner. Based on Blattner's per-acre cost of restoration (\$1,500/acre), the total cost for revegetating 63.82 acres will be \$95,730, increasing their overall estimate by \$38,730. Based on this, the total retirement cost assumed by Blattner would be \$445,180.
7. Based on the outcome of discussions with DOE, PPM will obtain the required comfort letter if needed.
8. A new letter from the Sheriff has been requested, and will be sent as soon as possible.
9. We have asked DOE to forward our responses to RAI #2 questions related to noise to Kerrie Standley. Please let us know if further information is needed.

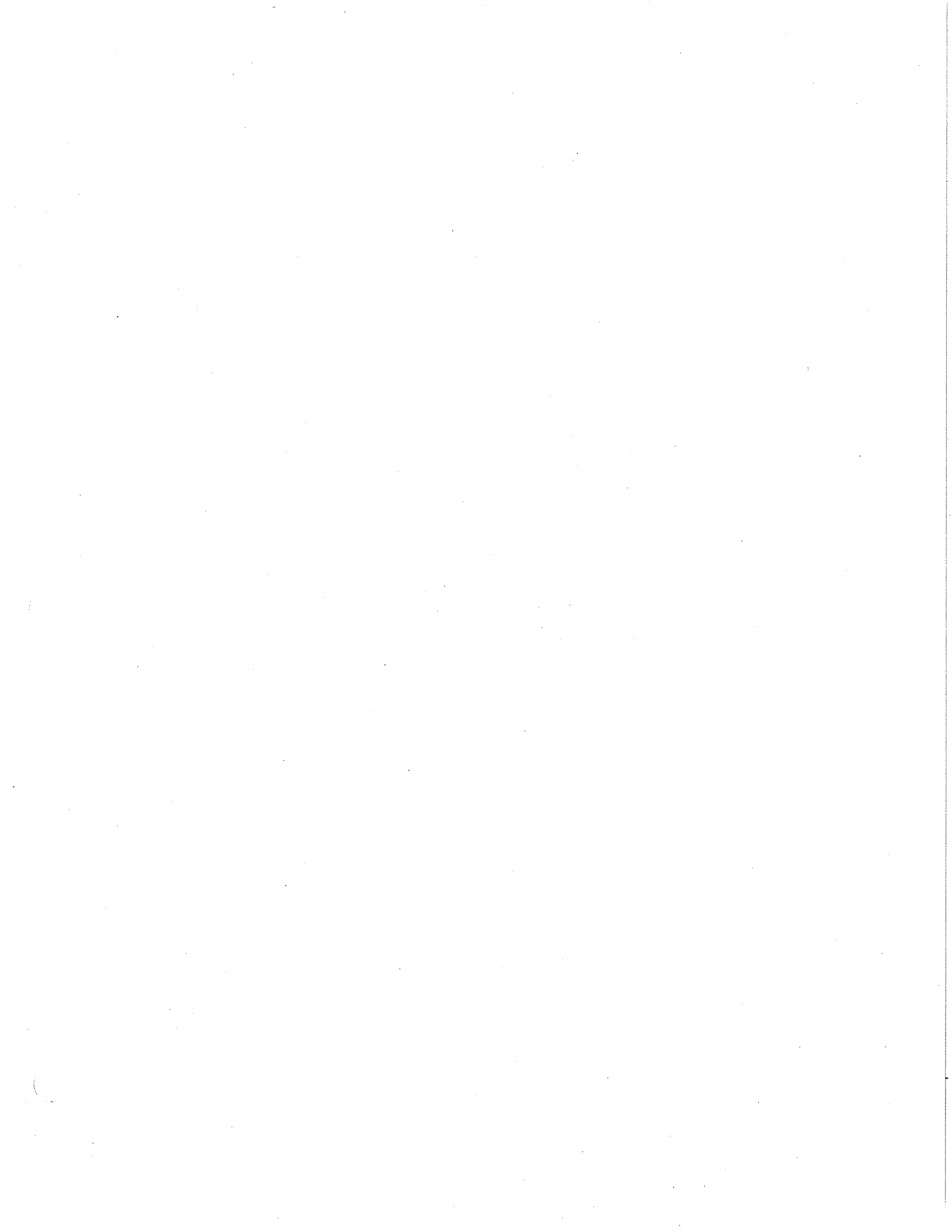
As you know, PPM has requested that the Site Certificate authorize placement of turbines within a defined corridor rather than at specific points. I have enclosed a table that describes the endpoints of the turbine strings. PPM asks that DOE's evaluation be based upon a project design that includes no more than 165 turbines.

Within cultivated lands, PPM proposes that the turbines be authorized anywhere within the 300-foot corridor (150 feet from centerline described by the string endpoints). Within CRP lands or areas that are identified as Category 2, 3, or 4 habitat, PPM asks for the flexibility to also locate turbines anywhere within the 300-foot corridor. This is a change from our original request to move them up to 50 feet, because we have now analyzed the potential impacts to identified target species.

Threatened, endangered and sensitive target species were surveyed up to 1000 feet from string centerlines. The sightings closest to any defined string were a Prairie Falcon (275 feet from string wpt 103 – wpt 116) and a jack rabbit sp, 100 feet from string wpt 119 – wpt 125)(See figure 1 of the Summary of 2004-2005 Wildlife Surveys). Prairie Falcons have very large territories, and movement of turbines within the corridor would have no effect on foraging or other behavior. The jack rabbit was sighted in grassland habitat adjacent to a string corridor that is located entirely in cultivated lands. Jack rabbits do not use agricultural lands for any life stage requirement or feeding and would not be impacted by moving turbines within the agricultural corridor. Other target species sighted were even further from the nearest string and these species would not be affected by moving turbines within the 300-foot corridors. No impacts to Category 1 habitat, trees, nesting sites for species of concern, cultural resources, or wetlands/waters of the state will occur as a result of this flexibility if granted by DOE.

To estimate the maximum impact to habitat categories 2, 3, and 4, DEA reviewed the habitat map from Exhibit P, and directed the GIS staff to move the turbines in the direction that would increase impacts (i.e. towards areas of greater habitat or higher value habitat. For instance, on string wpt 31 to wpt 37, the turbines and roads were moved west away from agricultural land to show a maximum impact in CRP lands. On string wpt 1 to wpt 17 the facilities were moved eastward toward CRP land. In addition, this exercise was completed for strings wpt 18 to wpt 25 and wpt 38 to wpt 40. Please note that for string wpt 103 to wpt 116, movement of turbines in any direction results in the same impact to CRP. Based on this analysis, we have enclosed the revised table P3 to show maximum theoretical impact to categorized habitats. The proposed habitat mitigation site is more than large enough to accommodate mitigation for these small changes in habitat impacts.

Attachments/Enclosures: Turbine String Endpoint table (GPS points)
Revised Table P3



From: Dana Siegfried
To: John White
Date: Wed, Dec 7, 2005 3:26 PM
Subject: Klondike Completeness information

Attached are our micrositing proposal and response to your 11/22 e-mail. As always, please let us know if there are questions.

FYI, I have asked Martha to contact Kerrie Standlee about the substation transformer issue.

Dana Siegfried
David Evans and Associates
503.499.0369

CC: Jesse Gronner

DATE: December 6, 2005
TO: John White, Department of Energy
FROM: Dana Siegfried
SUBJECT: **Response to 11/22/05 e-mail**
PROJECT: Klondike III Wind Project
PROJECT NO: PPME00000001
COPIES: Jesse Gronner

1. (Exhibit B) - In my e-mail of 10/31/05, I said that identification of the proposed "turbine corridors" must be provided before the application could be considered complete. I suggested identification of centerlines and a proposed distance from the centerline to define a corridor, but any method of specifying the location and size of the corridors would be acceptable. In addition, the application must include an estimate of the acreage of higher-value habitat (Category 1 through 5) potentially affected by micro-siting within the corridors. If that estimate changes the amount of habitat mitigation needed, then the proposed additional mitigation must be described.

See attached memorandum regarding turbine corridors. We would appreciate discussing your thoughts on this proposal at your earliest convenience.

2. (Exhibit B) - In my letter of 9/16/05, I said that "the total number of turbines could be more than 165." This was based on the meeting at our office in which you said that the number could be more than 165. The application must state the upper limit on the number of turbines that would be approved for construction under a site certificate. Although I will stand by my letter and not require this for completeness, it would be very helpful to have this question resolved as soon as possible.

No more than 165 turbines are proposed at this time.

3. (Exhibit B) - Dana's memo of 11/11/05 partially addresses RAI #2 B9 regarding portions of the collector system that might be aboveground. Although we would prefer to know specifically where the aboveground segments would be, the condition that Dana proposed would probably be acceptable to the Council. Nevertheless, for the aboveground segments of 34.5 kV collector, the application must describe the transmission line structures that would be used (types of poles, spacing, conductor height), must include a calculation of electric and magnetic fields and must estimate the cost of removal of the aboveground collector line as part of the retirement cost estimate.

Triaxis Engineering is working on a diagram of structures that would be used as well as EMF analysis for an aboveground 34.5 kV collector line. This should be available by 12/16/05. Removal cost will be addressed in the separate discussion relative to the overall decommissioning issue.

4. (Exhibit E) RAI #1 E3 - I acknowledge that the DEQ letter is not essential for completeness, but please provide it as soon as possible.

DEQ has provided the information requested.

5. (Exhibit J) - Please let me know whether you contacted the U.S. Army Corps of Engineers to confirm that no Section 404 permit would be needed.

We have not and it is our understanding that this is not needed for completeness.

6. (Exhibit K) - I am still waiting for DOJ legal analysis on the Goal 3 exception issue. In aid of the analysis, it would be helpful if you could provide a table showing the estimated acreage occupied by facility components, broken down as follows:

- Turbine towers, including pad area
- Meteorological towers
- Above ground transmission line (This might be presented as a range, given the uncertainty about how much collector line would be built above ground. The estimate should be of the acres "precluded" from use in farming operations; for example, although support poles may have a very small footprint, a somewhat larger area around the base of the pole would be "precluded" from other uses.)
- Access roads
- Substations (the application says 4 acres for each, including the O&M building)

FACILITY COMPONENT	ACRES
Turbine Towers	4.0*
Meteorological Towers (3 @ approx. 400 ft ²)	0.03
Above Ground Transmission Line (@ 21 towers per mile, max 4.5 miles, @ approx. 25 ft ²)	0.05
Access Roads (approx. 17 mi in ag lands @ 20 ft wide)	41 **
Substations	8.0
Total	53.08***

*Original estimate (Exhibit K) was based on underground footprint of 2000 ft²; the above estimate is based on above ground footprint of 1000 ft² that cannot be farmed.

**Original estimate (Exhibit K) was based on 19 miles of total roads, and in general was overly conservative to ensure no underestimation of impacts.

***The difference between total area precluded from farming (approximately 53 acres) and total permanent impacts from Table P3 (63.82 acres), is roughly the amount of impact in areas not currently being farmed.

7. (Exhibit K) RAI #1 K11 - Please provide the results of the on-site test pit evaluation and a copy of the septic system permit application, when available.

This will be provided as soon as it is available from the county sanitarian.

8. (Exhibit W) - Dana's letter indicates that additional information regarding scrap value and a methodology for future adjustment will be forthcoming. I also hope to have additional information from our consultants. I

ordinarily like to have the cost estimate settled before calling an application complete, but it is not essential (you have provided an estimate; we just disagree over the amount). I hope that we can resolve the site restoration estimate within the next 30 days.

We will provide a revised proposal for a decommissioning bond amount by 12/16/05.

9. (Exhibit W) - For the purposes of calculating the retirement cost estimate, we need to know the maximum number of turbines (#2 above).

No more than 165 turbines are proposed at this time.

10. (Exhibit W) - Dana's letter also partially addressed the re-vegetation issue. Her memo acknowledges that the area needing revegetation would be at least as large as the permanent footprint of the facility. In the past, however, the Council has assumed that additional area outside the footprint would be temporarily disturbed by site restoration activities and the Council has estimated this area would be equal to the area of temporary disturbance during construction. Unless you can show reasons why this would not be likely, the total area needing revegetation would be approximately 161 acres (including both the footprint and the additional area of temporary disturbance).

Will be addressed in revised decommissioning proposal by 12/16/05.

11. (Exhibit M) RAI #2 M4 - The revised "comfort letter" (if needed) must be submitted before the draft proposed order can be issued. We cannot determine whether a new letter is needed until we settle the cost estimate.

To be determined based on proposal above.

12. (Exhibit U) RAI #1 U6 - Please provide the Sheriff's letter as soon as possible (it is not essential that we have this for a finding of completeness).

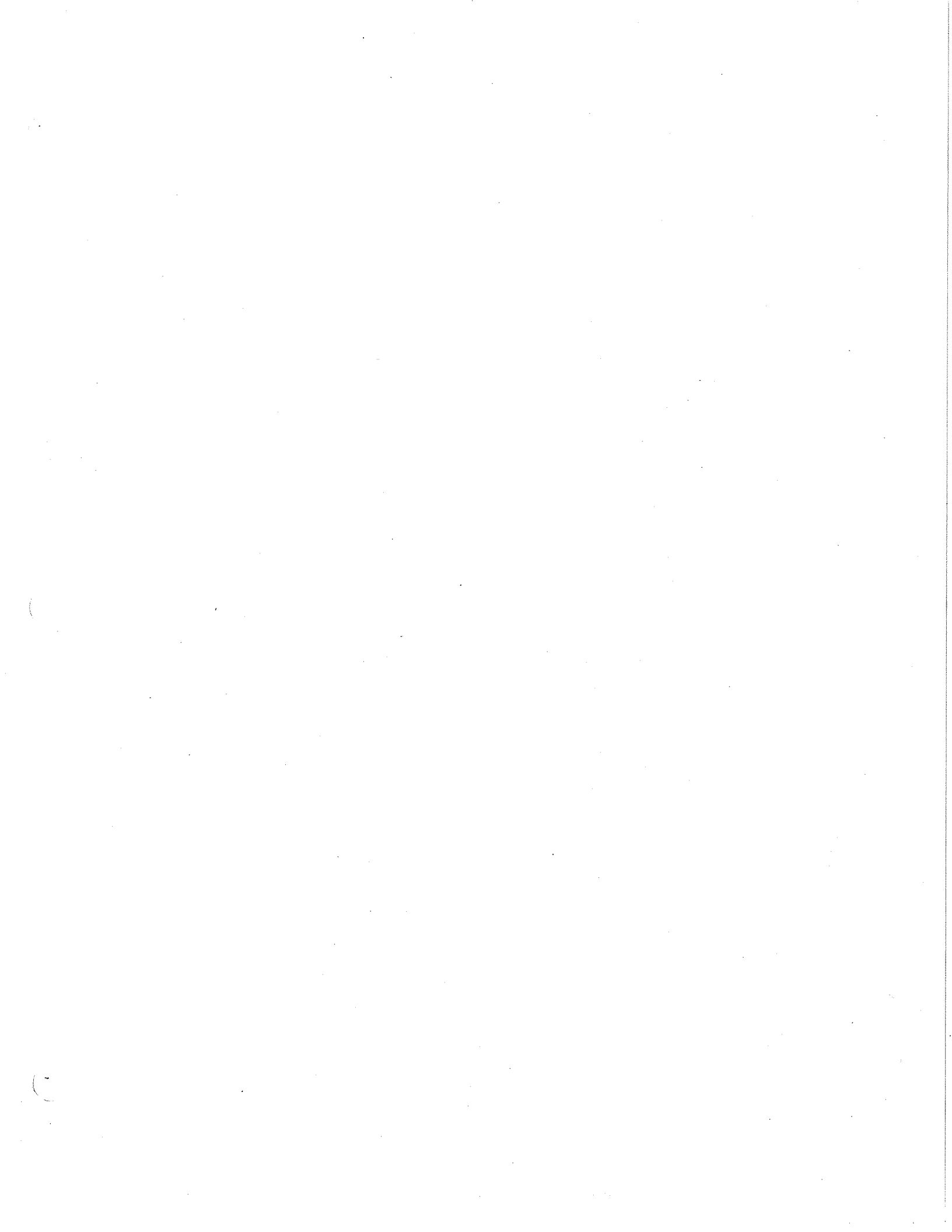
The Sheriff's letter has been provided.

13. (Exhibit X) - Additional information is needed for completeness. I have authorized your noise consultant to discuss this matter directly with our noise consultant to determine what additional information is needed.

The applicant proposes to comply with the noise standard in one of two ways. The most likely scenario is that waivers will be obtained from the affected land owners. In the unlikely event that this does not occur, PPM proposes to remove the turbines that, in their final position, result in non-compliance with the noise standard. The applicant's noise consultant is evaluating the potential for turbines, microsituated at worst-case positions within the 900-foot proposed corridor, to cause non-compliance with the standard. This information will be provided to the Department as soon as the analysis is complete. The applicant will model the final position of the turbines to determine whether the turbines need to be removed from the project, if the appropriate waivers have not been granted.

Attachments/Enclosures: Corridor Micrositing proposal and attachments

C:\Temp\response to 11_22email.doc



DATE: December 9, 2005
TO: John White
FROM: Dana Siegfried
SUBJECT: **Turbine Corridor Micrositing**
PROJECT: Klondike III Wind Project
PROJECT NO: PPME00000001
COPIES: Jesse Gronner

As you know, PPM has requested that the Site Certificate authorize placement of turbines within a defined corridor rather than at specific points, in order to micro site turbines at the optimal locations for wind capture. Enclosed is a table that describes the endpoints of the turbine strings. Because the turbine strings are straight, connecting the endpoints describes a centerline, around which project surveys and mapping have been completed.

The applicant has conducted the following detailed, on-the-ground surveys for the project:

- 2300-foot wide corridors for vegetation, target species (except jackrabbit), and wildlife habitat
- 900-foot wide corridor for white-tailed jackrabbit
- 300-foot wide corridor for cultural resources
- 300-foot wide corridor for wetlands and other waters of the state

MICROSITING PROPOSAL

PPM proposes that the turbines be authorized anywhere within the 300-foot corridor (150 feet from centerline described by the string endpoints) without condition or administrative review following issuance of the Site Certificate. This is a change from our original request to be allowed to microsite turbines up to 50 feet from currently shown locations, because we have now fully analyzed the potential impacts to existing resources, including identified target species. PPM also requests the flexibility to locate turbines in the area between 150 feet and 450 feet from the centerline, for a total corridor width of 900 feet, with submittal to DOE of additional cultural resource and wetland surveys, and administrative review by DOE.

Micrositing within 300-foot corridor.

Within the 300-foot corridor, no impact to cultural resources or wetlands will occur. Impacts to vegetation, habitat, and target species, as well as mitigation for these impacts, have largely been described in the Application for Site Certificate. To estimate the maximum impact to habitat categories 2, 3, and 4, DEA reviewed the habitat map from Exhibit P, and directed the GIS staff to re-map the turbines in the direction that would increase impacts (i.e. towards areas of greater habitat or higher value habitat).

For instance, on string wpt 31 to wpt 37, the turbines and roads were moved west away from agricultural land to show a maximum impact in CRP lands. On string wpt 1 to wpt 17 the facilities were moved eastward toward CRP land. In addition, this exercise was completed for strings wpt 18 to wpt 25 and wpt 38 to wpt 40. Please note that for string wpt 103 to wpt 116, movement of turbines in any direction results in the same impact to CRP. Based on this analysis, we have enclosed the **Revised Table P3 (300-foot corridor)** to show maximum theoretical impact to categorized habitats. The proposed habitat mitigation site, which is substantially larger than needed for the impacts identified in the ASC, is more than large enough to accommodate mitigation for these small changes in habitat impacts.

Threatened, endangered and sensitive target species were surveyed up to 1000 feet from the site boundary (which is a 300-foot wide corridor, for a total of 2300 feet). The sightings closest to any defined string were a Prairie Falcon (275 feet from string wpt 103 – wpt 116) and a jack rabbit sp, 100 feet from string wpt 119 – wpt 125) (See figure 1 of the Summary of 2004-2005 Wildlife Surveys). Prairie Falcons and all other raptors have very large territories, and movement of turbines within the corridor would have no effect on foraging or other behavior. The jack rabbit was sighted in grassland habitat adjacent to a string corridor that is located entirely in cultivated lands. Jack rabbits do not use agricultural lands for any life stage requirement or feeding and would not be impacted by moving turbines within the agricultural corridor. Other target species sighted were even further from the nearest string and these species would not be affected by moving turbines within the 300-foot corridors.

No impacts to Category 1 habitat, nesting sites for species of concern, cultural resources, or wetlands/waters of the state will occur as a result of this flexibility if granted by DOE.

Micrositing with 900-foot corridor.

If micrositing indicates that certain turbines would optimally be located outside of the 300-foot corridor (i.e., more than 150 feet but less than 450 feet from center line), PPM proposes to conduct cultural resource and wetland surveys and submit that information to DOE prior to construction. If these surveys indicate, and DOE agrees, that no impact would occur to these resources, then no additional mitigation would be proposed. PPM requests that approval of turbine siting in this expanded corridor be allowed based on administrative review of the information submitted. It should be noted that the potential for either cultural resources or wetlands is low throughout the general project area, and that given the predominantly cultivated nature of the lands within the 900-foot corridor, it is unlikely that impacts to either resource would occur (but, again, we would provide documentation to support this).

To estimate the maximum potential impact to habitat categories 2, 3, and 4, DEA reviewed the habitat map from Exhibit P, and directed the GIS staff to re-map the turbines in the direction that would increase impacts (i.e. towards areas of greater habitat quantity or higher value habitat), similar to above. Enclosed is the Revised Table P3 (900-foot corridor).

No impacts to Category 1 habitat, nesting sites for species of concern, cultural resources, or wetlands/waters of the state will occur as a result of this flexibility if granted by DOE.

For micrositing turbines within a 900-foot corridor, potential non-compliance with the noise standard is being evaluated in the following manner: TW Environmental is modeling the resulting noise that would be anticipated

John White

December 9, 2005

Page 3

from moving every turbine 450 feet closer to its nearest sensitive receptor. Those turbines that result in exceedence of the noise standard would be removed as a part of the project in the unlikely event that waivers are not signed by the affected property owners. The results of this worst-case analysis will be provided as soon as they are available.

In short, the applicant proposes remove turbines that result in exceedence of the noise standard only if both 1) the final location of the turbines exceed the noise standards and 2) appropriate waivers have not been executed. The determination of whether the noise standard is met will be determined using the **final** location of turbines, with model results provided to the Department when final turbine locations are known, if executed waivers have not been provided.

Attachments/Enclosures:

Turbine String Endpoint table

Revised Table P3 (300) for the 300-foot corridor maximum impacts

Revised Table P3 (900) for the 900-foot corridor maximum impacts

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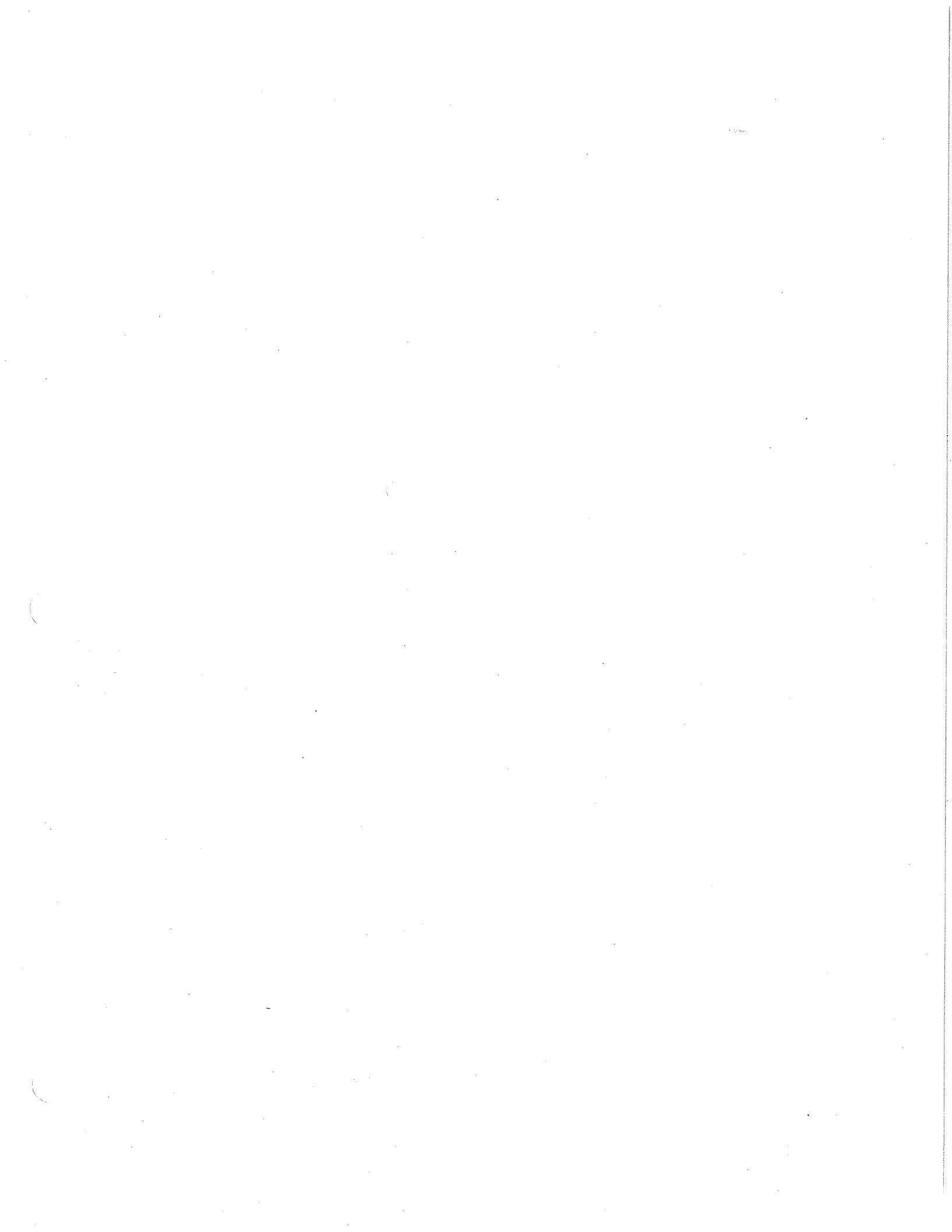




Table P- 3 (300). Habitat Types and Categories in the Klondike III Wind Project Analysis Area with Area of Impact (Maximum 300-foot Corridor Impacts)

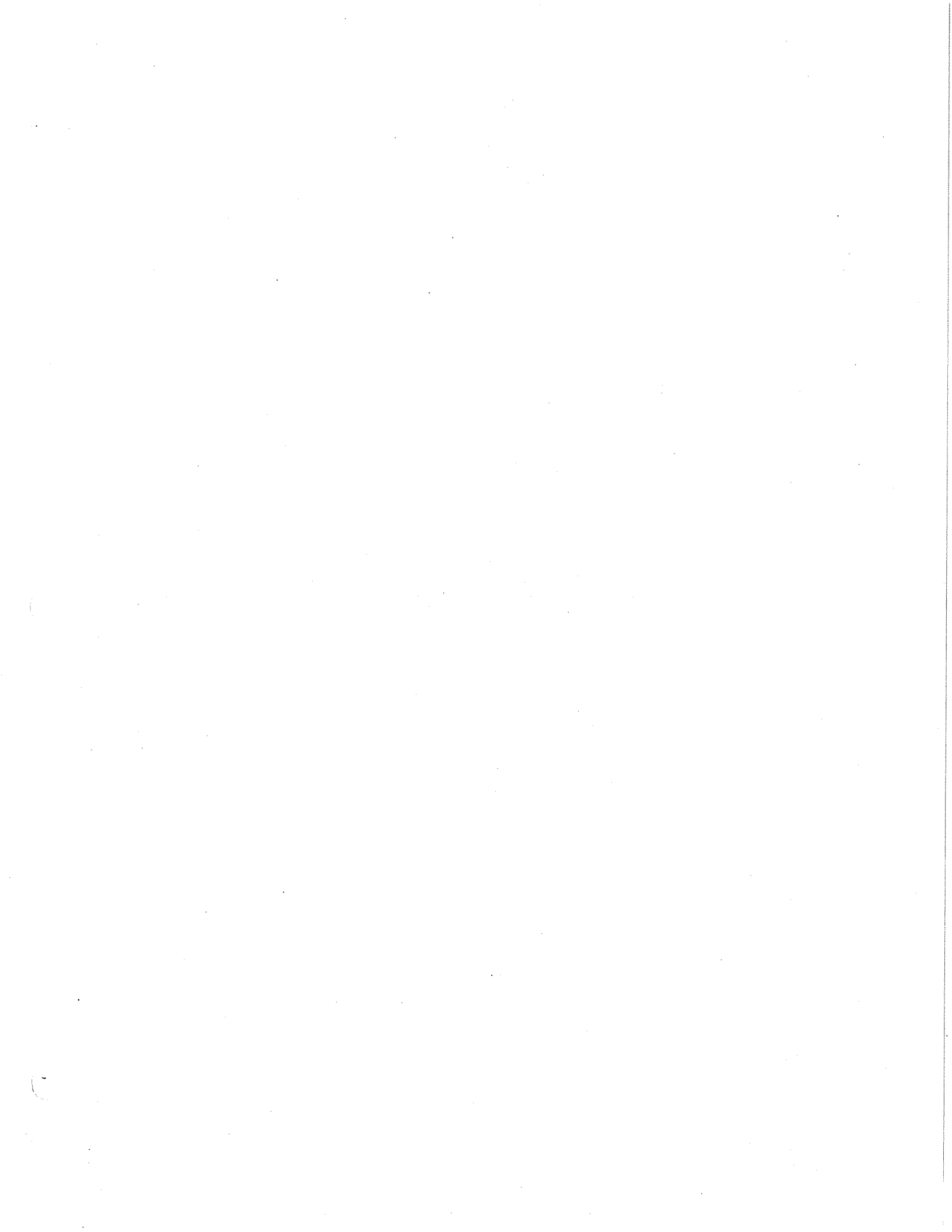
	Total Acres	IMPACTS (Acreage and % of total impact)					
		Temporary Impacts (with turnaround impacts)		Temporary Impacts (turnaround Impacts only)		Permanent	
Category 1	0.00	0.00		0.00		0.00	
Category 2							
Grassland	107.77	1.25	(1.29%)	1.25	(2.46%)	0.52	(0.815%)
Shrub-steppe	39.62	0.00		0.00		0.14	(0.219%)
Category 3							
CRP	865.19	10.44	(10.75%)	8.43	(16.59%)	6.45	(10.105%)
Grassland	382.70	2.19	(2.25%)	2.19	(4.31%)	0.18	(0.282%)
Shrub-steppe	43.96	1.42	(1.46%)	1.42	(2.80%)	0.00	
Intermittent streams	4.85 (miles)	0.00		0.00		0.00	
Upland trees	11.30	0.00		0.00		0.03	(0.047%)
Category 4							
Grassland	97.95	0.159	(1.17%)	0.158	(.311%)	0.05	(0.078%)
Category 5	0.00	0.00		0.00		0.00	
Category 6							
Developed	39.67	0.00		0.00		0.00	
Agricultural	9,614.04	81.67	(84.08%)	37.35	(73.52%)	56.35	(88.295%)
TOTAL	11,202.9 + 4.85 miles of intermittent stream	97.13	(100%)	50.80	(100%)	63.82	(100%)

Revised 10-07-05

**Turbine****Number****Latitude****Longitude**

Wpt53	53	45.61346370000	-120.58845450000
Wpt50	50	45.61811216000	-120.58855202000
Wpt57	57	45.62162465000	-120.58004752000
Wpt54	54	45.62586049000	-120.58014585000
Wpt58	58	45.62599850000	-120.55320828000
Wpt71	71	45.60688553000	-120.55306190000
Wpt72	72	45.60407109000	-120.55829426000
Wpt75	75	45.59977288000	-120.55819622000
Wpt85	85	45.60403267000	-120.53060975000
Wpt84	84	45.60695245000	-120.51818634000
Wpt95	95	45.60224306000	-120.51261574000
Wpt76	76	45.61862522000	-120.51853089000
Wpt103	103	45.60420455000	-120.48533296000
Wpt116	116	45.58496973000	-120.48513612000
Wpt117	117	45.58184026000	-120.48024932000
Wpt118	118	45.57998215000	-120.48020049000
Wpt119	119	45.58229149000	-120.46256500000
Wpt125	125	45.57388984000	-120.46261412000
Wpt102	102	45.59192026000	-120.51256887000
Wpt126	126	45.58940740000	-120.50693363000
Wpt94	94	45.59109475000	-120.53060814000
Wpt163	163	45.58210000000	-120.55280000000
Wpt165	165	45.57781666000	-120.55280000000
Wpt136	136	45.58262994000	-120.52971039000
Wpt149	149	45.56384286000	-120.52936518000
Wpt150	150	45.56167545000	-120.52340252000
Wpt135	135	45.57526711000	-120.50673689000
Wpt157	157	45.56580402000	-120.50620288000
Wpt162	162	45.55861344000	-120.50610626000
Wpt156	156	45.55255824000	-120.52325456000
Wpt1	1	45.56143104000	-120.66263222000
Wpt26	26	45.56082735000	-120.62164462000
Wpt10	10	45.54668547000	-120.66233485000
Wpt11	11	45.54475534000	-120.65828190000
Wpt18	18	45.55153273000	-120.63639962000
Wpt30	30	45.55487207000	-120.62164402000
Wpt31	31	45.55246254000	-120.61348375000
Wpt37	37	45.54340912000	-120.61299560000
Wpt38	38	45.54166556000	-120.60473603000
Wpt40	40	45.53863962000	-120.60468682000
Wpt25	25	45.54154988000	-120.63605834000
Wpt17	17	45.53569225000	-120.65793936000
Wpt129	129	45.58479718000	-120.50693322000
Wpt130	130	45.58256088000	-120.50688415000
Wpt4	4	45.55657671000	-120.66253187000
Wpt5	5	45.55399210000	-120.66253144000
Wpt41	41	45.55442228000	-120.57072676000
Wpt43	43	45.55125879000	-120.57072605000
Wpt44	44	45.54888661000	-120.56593824000
Wpt49	49	45.54170001000	-120.56583954000





From: "Dana Siegfried" <Dns@deainc.com>
To: WHITE John <John.White@state.or.us>
Date: 1/19/2006 11:00:24 AM
Subject: Re: acreages

John, thanks for the follow up. This accurately represents what we talked about.

Dana Siegfried
David Evans and Associates
503.499.0369

>>> "John White" <John.White@state.or.us> 1/18/2006 4:29 PM >>>

Dana,

This email is to confirm our telephone discussion today. We agreed that the acreage information on the most recent "P-3" tables is the most accurate estimate of the permanent and temporarily disturbed areas for the Klondike III project. For the purposes of both the Goal 3 analysis and the site restoration estimate, we agreed to allocate the permanent acres (64 acres) to the facility components as follows:

Turbine towers, including pad areas and road turnouts (10 acres)
Access roads (46 acres)
Meteorological towers (0.03 acres)
Aboveground 34.5 kV collector line (0.05 acres)
Aboveground 230-kV transmission line (0.05 acres)
O&M building site, including the Webfoot substation (4 acres)
Schoolhouse substation (4 acres)

The total is 64.13 acres. The difference from Table P-3 is due to rounding of the towers and roads areas.


If you have any questions about this let me know as soon as possible.

Thanks,

John

John G. White
Oregon Department of Energy
625 Marion St., NE
Salem, Oregon 97301-3742
john.white@state.or.us

CC: <jesse.gronner@ppmenergy.com>



From: "Gronner, Jesse" <Jesse.Gronner@PPMEnergy.com>
To: "John White" <John.White@state.or.us>
Date: 1/18/2006 11:44:04 AM
Subject: RE: Noise data


John,

The 34.5 kV line could either be single or double circuit, we provided data for both, but feel free to assume double circuit for your review to keep with "worst-case" theme. We would either use wood or steel, not ready to commit to one or the other at this time. If steel, the salvage value would negate removal cost, if wood then the cost would be minimal.

The county application I just sent covers both test pit evaluation as well as for the actual permit. I only checked the "Evaluation" box and not the "New Installation" box because the permit would be obtained much closer to construction. There is not a separate permit application. This should not be a siting issue for the Council to be concerned with, it is a construction-related building permit. The test pit evaluation will be sent as soon as I receive it, the check to the County is in the mail.

Thanks,
Jesse

-----Original Message-----




From: John White [mailto:John.White@state.or.us]
Sent: Wednesday, January 18, 2006 10:53 AM
To: Gronner, Jesse
Cc: dns@deainc.com; Daul, Ty
Subject: RE: Noise data

Jesse,

Thanks for the EMF analysis. It shows both single and double circuit configurations. Does that mean that you anticipate that there could be both types in the actual construction? The description does not specify whether these would be wood poles (versus concrete or steel). Would you be able to commit to using wood? I agree that the retirement cost would not be a major change to the overall total, but I want to give you an opportunity to include that in your cost estimate.

I am still working on our independent retirement cost estimate. I need information from Dana on acreages to complete the estimate (I have left several messages for her about this). When our estimate is done, I will send it to you and give you the opportunity to comment. This is one of the major post-completeness issues that we will need to deal with.

On the county septic analysis, what you sent appears to be a request for an evaluation. I assume this is the "test pit evaluation" we have discussed. I gather that you requested the evaluation, but did not pay for it?



Is there a separate permit application? If so, I would like to see a "draft" permit application. You should not actually submit the application to the county until we determine whether the permit is a siting issue. If it is, then the Council would make the decision on

whether the permit should be issued (you would then submit the application to the county and the county would be bound by the Council's decision to issue the permit). On the other hand, if we determine that this permit is not a siting issue but is instead a construction-related permit (similar to a building permit), then the Council would not be involved in the decision to issue the permit (although the site certificate would require that you obtain all necessary permits). I thought that seeing the permit application would help us decide how to treat this (whether it is a siting decision or not).

Can you clarify whether there is a separate permit application, and if so, send us a draft? If it is a siting decision, then we will need to see the test pit results.

-John

>>> "Gronner, Jesse" <Jesse.Gronner@PPMEnergy.com> 01/18/06 10:04AM

>>>

John,

I thought I had sent the 34.5 Kv analysis awhile ago, sorry about that.

Please see attached, which includes description of structures as well as

EMF analysis.

Please use 5.5 miles as the upper limit for 34.5 kV overhead (which is roughly 15% of total).

I do not believe this will change the retirement cost estimate in a significant way, there is already much contingency built into the cost estimate, and this could easily be covered in addition to the amount associated with the overhead 230 kV line.

I just spoke with the sanitarian at Wasco-Sherman Public Health Dept. He has completed the test pit evaluation and is just waiting for our check (which is in process) to send on the evaluation. I have attached

a copy of our application. I ask that this please not hold up our completeness, it is done just waiting for payment to be processed.

After today, I will be unavailable through next week. If questions are

in need of answering after today please work with Dana, and if someone at PPM is needed to answer anything, please get in touch with Ty Daul. I'll be back in the office on 1/30.

Thanks,
Jesse

-----Original Message-----

From: John White [mailto:John.White@state.or.us]

Sent: Wednesday, January 18, 2006 9:21 AM

To: Gronner, Jesse

Cc: dns@deainc.com

Subject: RE: Noise data

Thanks. I will be unavailable tomorrow after 10:00 and all day Friday due to a Council meeting in Pendleton.

We will have a number of unresolved issues to discuss after the finding of completeness. I am taking a gamble that we will be able to settle these within 30 days or so after completeness.

Aside from the noise information, my notes show the following items remain as part of completeness:

Test pit evaluation and application for county septic permit.

Description of aboveground 34.5 kV transmission line. Confirmation of maximum length permitted (is it 4.5 miles or is it 15% of 38 miles?).

Description of aboveground support structures. EMF analysis.

Retirement

cost estimate. Dana's memo of December 6 said that Triaxis was working on this and that the information would be available "by 12/16/05."

-John

John G. White
Oregon Department of Energy
625 Marion St., NE
Salem, Oregon 97301-3742
john.white@state.or.us

>>> "Gronner, Jesse" <Jesse.Gronner@PPMEnergy.com> 01/18/06 08:59AM

>>>

John,

Dana and Martha spoke and I'm told you will be receiving what you asked for below in the next day or so.

Dana - if possible, please have sent electronically so that John can quickly/easily forward on to Kerrie.

Regards,
Jesse

-----Original Message-----

From: John White [mailto:John.White@state.or.us]

Sent: Tuesday, January 17, 2006 11:57 AM

To: Gronner, Jesse

Cc: dns@deainc.com

Subject: Noise data

Jesse,

Thank you for sending the electronic file of Martha Moore's memo of January 10. I have forwarded this information to Kerrie Standlee.

The data printouts in Attachment 3 to the memo show data for R3, R4, R5, R6 and R7 with "high towers eliminated." We need to see the data for

these receivers with all towers included (as you have done for R1 and R2). Please provide this in PDF format.

Once this information has been provided, I believe that we will have a complete Exhibit X.

-John

John G. White
Oregon Department of Energy
625 Marion St., NE
Salem, Oregon 97301-3742
john.white@state.or.us

CC: <dns@deainc.com>, "Daul, Ty" <Ty.Daul@PPMEnergy.com>



From: "Gronner, Jesse" <Jesse.Gronner@PPMEnergy.com>
To: "John White" <John.White@state.or.us>
Date: 1/18/2006 10:05:26 AM
Subject: RE: Noise data

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John G. White
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>>> "Gronner, Jesse" <Jesse.Gronner@PPMEnergy.com> 01/18/06 08:59AM

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Jesse

-----Original Message-----

From: John White [mailto:John.White@state.or.us]
Sent: Tuesday, January 17, 2006 11:57 AM
To: Gronner, Jesse
Cc: dns@deainc.com
Subject: Noise data

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John G. White
Oregon Department of Energy
625 Marion St., NE
Salem, Oregon 97301-3742
john.white@state.or.us

CC: <dns@deainc.com>, "Daul, Ty" <Ty.Daul@PPMEnergy.com>

WASCO-SHERMAN PUBLIC HEALTH DEPARTMENT

419 East Seventh, Room 100

The Dalles, OR 97058

(541) 506-2600

Permit Number:
Date Issued:

Application for:

County:

Date Pd: Eval

Evaluation New Installation
 Repair Other

Wasco Sherman

Permit
Other

Klondike Wind Power III, LLC
 (Name of Applicant)
c/o PPM Energy, Inc.
1125 NW Couch St, Suite 700
 (Mailing Address)

Township 1N Range 40E Section 11

Tax Lot # 300

Site Address: Northwest of Klondike

Portland OR 97209
 (City) (State) (ZIP)

Lane, 2 1/2 miles east of Beacon Rd.

(Telephone) 503-796-7000

Proposed use:

Residential Commercial

Other (explain) Industrial: Wind Farm
Operations Building

Water Supply:
Community

Private: Well Spring

DIRECTIONS TO PROPERTY: (Please be specific.)

I-84 to Beqgs, south on 97, left toward Wasco
In Wasco follow signs to Wasco Airport (left), turn into Holderbrand
Right on N Klondike Rd when Holderbrand Lane ends
Left on Klondike Lane, 4 miles down on left is the site

Property Zone EF4

Size of lot or parcel 786.74 acres

Test Holes [] have been prepared [] will be prepared (date)

Jesse Gorman
 (Signature Owner/Installer) Project Manager

10/16/05
 (Date)

IMPORTANT: ATTACH A MAP OF PROPERTY INCLUDING LOCATION OF WELL, ANY WELLS ON
 ADJACENT PROPERTY, AND TEST HOLES. ON LOTS LESS THAN 20 ACRES, APPROXIMATE PROPERTY
 BOUNDARIES SHOULD BE VISIBLY MARKED.

REVISED EXHIBIT F

PROPERTY OWNERSHIP

OAR 345-021-0010(1)(f)

TABLE OF CONTENTS

	Page
F.1 INTRODUCTION	1
F.2 SUMMARY	1

TABLES

Table F- 1. Property Ownership Within 500 Feet of Facility Site	2
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F.1 INTRODUCTION

OAR 345-021-0010(1)(f) *A list of the names and mailing addresses of all owners of record, as shown on the most recent property tax assessment roll, of property located within or adjacent to the corridor(s) the applicant has selected for analysis as described in subsection (b) and property located within or adjacent to the site of the proposed facility. The applicant shall submit an updated list of property owners as requested by the Office of Energy before the Office issues notice of any public hearing on the application for a site certificate as described in OAR 345-015-0220. In addition to incorporating the list in the application for a site certificate, the applicant shall submit the list to the Office in electronic format suitable to the Office for the production of mailing labels. Property adjacent to the proposed site of the facility or corridor means property that is:*

OAR 345-021-0010(1)(f)(A) *Within 100 feet of the site or corridor, where the site or corridor is within an urban growth boundary;*

OAR 345-021-0010(1)(f)(B) *Within 250 feet of the site or corridor, where the site or corridor is outside an urban growth boundary and not within a farm or forest zone;*

OAR 345-021-0010(1)(f)(C) *Within 500 feet of the site or corridor, where the site or corridor is within a farm or forest zone.*

Response: The site, including the overhead collector line, is within a farm or forest zone; see Section F-2 and corresponding Table F-1.

F.2 SUMMARY

The site is within a farm or forest zone. Table F-1 of this Exhibit provides the required list of property owners within 500 feet of the site boundary. In preparing the table, the Applicant assembled the relevant sections of the current Sherman County tax maps and reviewed the tax maps to identify tax lots wholly or partially within the areas required by OAR 345-021-00010(1)(f). The Applicant used these names and addresses to prepare Table F-1.

Table F-1. Property Ownership Within 500 Feet of Facility Site

Tax Lot #	Landowner(s)	Address	Township, Range	Section
600	Nancy M. Faner, Trustee and Richard G. Harber and Gerry H. Harber, Trustee	Nancy Faner 23860 Long Valley Rd Hidden Hills, CA 91302	W.M. Sherman County T.1N. R.18E	2
500	Rodney M. Welk and Lynette K. Welk, Trustees	Rodney Welk 31530 Sodaville Rd Lebanon, OR 97355	T.1N. R.18E	2
800	James Weir Memorial Fund - Bigelow District	c/o J. Thomas Coats 113 "A" E. Second Street The Dalles, OR 97058	T.1N. R.18E	3
7100, 8400	Richard E. Jones and Robert C. Jones, Jr. and Mary Alice Jones, Trustees	Robert C. Jones 1928 S. Century Lane Spokane Valley, WA 99037-8351	T.2N. R.18E	28
2400 / 2500 / 2700 / 2800	Roland and Sharon Simantel	Roland & Sharon Simantel PO Box 364 Wasco, OR 97065	T.1N. R.18E	11, 12, 13, 14
3700 9300 / 9400 800 / 900 / 1000 / 1100 / 1200 / 1600 / 1900 300	Stevens Family Farms	c/o Arthur Stevens PO Box 257 Husum, WA 98623	T.1N. R.18E T.2N. R.18E T.1N. R.19E	20 36 6, 7, 8
6700 / 8700	Vernon and Virginia Melzer	PO Box 41 Wasco, OR 97065	T.1N. R.18E	1
3400	Frank and Deanna Zaniker	901 Richmond St The Dalles, OR 97058	T.1N. R.18E	27, 34
	Nancy Lewis	964A Kiely Blvd Santa Clara, CA 95051	T.1N. R.18E	19

Tax Lot #	Landowner(s)	Address	Township, Range	Section
3600	Elizabeth Thomas	3564 East 2nd #61 The Dalles, OR 97058	W.M. Sherman County T.1N. R.18E	19
5400 / 5500	U.S. Bank-Trustee - J.R. Morgan Trust, on behalf of Owners, and Marilyn Clark and Judy Probstfield	JR Morgan Trust (P&C) US Bank c/o Scott Robar SO-WA-T7TR 428 Riverside Ave Spokane, WA 99201	T.1N. R.17E	23, 24, 25, 26
2000	Lee and Terry Kaseberg	70031 Van Gilder Rd Wasco, OR 97065	T.1N. R.18E	9, 10
4101 / 4200	Lyndon P. & Symantha McClennan	P.O. Box 215 Wasco, OR 97065	T.1N. R.17E	14, 15
5300 / 5900	Alison Yamauchi	4900 Crestwood Dr Little Rock, AR 72207	T.1N. R.17E	22, 29
	Paula Walker Thompson	81157 McRae Rd. Helix, OR 97835		
	Judy Probstfield	8395 S.W. 88th Ave. Portland, OR 97223		
	Marilyn Clark	1502 Eugene Ave. Hood River, OR 97031		
5800 / 7700	Sylvia Irene Rogers, ET AL	2010 SW Nancy Dr. Gresham, OR 97080	T.1N. R.17E	27, 34
5600 / 7900	Kenneth R. Hart, Trust	95682 DeMoss Springs Lane Moro, OR 97039	T.1N. R.17E	25, 35
4000 / 4100 / 4201	Patrick A. & Kathleen A. Powell	7580 SW Fulton Park Blvd Portland, OR 97219	T.1N. R.17E	13, 14

Tax Lot #	Landowner(s)	Address	Township, Range	Section
3900	Ronald R. Powell, LE	c/o Patrick Powell 7580 SW Fulton Park Blvd Portland, OR 97219	W.M. Sherman County T.1N. R.17E	13
3300	Century Farm McDermid LLC	c/o Wendy Parker 26339 Stubbs Road Brownsville, OR 97327	T.1N. R.18E	18
5600	Eunice L. Henkle	c/o Carole Louise Makinster P.O. Box 353 Moro, OR 97039	T.1N. R.18E	30, 31
4700 / 4900 / 6300	James Robert Belshe LE	P.O. Box 327 Wasco, OR 97065	T.1N. R.18E	27, 28, 33
4000	Martin James Belshe	97200 Hwy. 206 Moro, OR 97039	T.1N. R.18E	23, 26
4200 / 4100	Robert Boyce Belshe William V. & Catherine Trimble BLM	P.O. Box 10 Sandy, OR 97055	T.1N. R.18E	24, 25

Tax Lot #	Landowner(s)	Address	Township, Range	Section
1400 / 2800 / 2900	Ray Smith	P.O. Box 344 Wasco, OR 97065	W.M. Sherman County T.1N. R.19E	7, 17, 19
	Douglas A. Smith	P.O. Box 221 Newport, OR 97365		
	Lawrence & Joanne Smith Trust	22 Arey's Lane Orleans, MA 02653		
	Danica Lindsey	17504 SE 12 th Drive Vancouver, WA 98683		
	Shelly Aebl	P.O. Box 1924 Lake Oswego, OR 97035		
2600	Ray Smith	P.O. Box 344 Wasco, OR 97065	T.1N. R.18E	13
	Douglas A. Smith	P.O. Box 221 Newport, OR 97365		
	Lawrence & Joanne Smith Trust	22 Arey's Lane Orleans, MA 02653		
	Danica Lindsey	17504 SE 12 th Drive Vancouver, WA 98683		
	Shelly Aebl	P.O. Box 1924 Lake Oswego, OR 97035		
1300 / 1500	Bonnie Anita Baker	1111 Wright St. The Dalles, OR 97058	T.1N. R.19E	7, 17
801 / 1001/ 1700 / 1800 / 801 / 1100	David Schlecht	5701 N.E. 88th St. Vancouver, WA 98665	T.1N. R.19E	5, 6, 7, 8
6000	Mederick Liberty Trust	c/o Leslie Suske 7510 Ridge Drive Gladstone, OR 97027	T.2N. R.18E	25

Tax Lot #	Landowner(s)	Address	Township, Range	Section
6300 / 6400 / 6500 / 9100 / 9200	Dewey J. Thomas Trustee	P.O. Box 153 Wasco, OR 97065	T.2N. R.18E W.M. Sherman County	26, 27, 35
9000	James E. & Dean W. Medler	James E. & Dean W. Medler 2067 Hwy. 52 Payette, ID 83661	T.2N. R.18E	35
	Louis Tatum - Living Trust	Louis Tatum Living Trust c/o Louann Jones P.O. Box 426 Irrigon, OR 97844		
5100 / 6900 / 7200	Dewey J. Thomas Trustee Ronald K. & Melva D. Thomas	James E. & Dean W. Medler 2067 Hwy. 52 Payette, ID 83661	T.2N. R.18E	21, 28, 29
7400	Delta M. Johnson, Trustee	3325 Columbia View Dr. #8 The Dalles, OR 97058	T.2N. R.18E	29
8200	Stuart M. Macnab	c/o Michael S. Macnab, Trustee 3440 N.W. Vaughn St. Portland, OR 97210	T.2N. R.18E	32
7000 / 8500 / 8701	James E. & Dean W. Medler Marci Medler Cress Thompson	Marci Medler Cress Thompson 66351 Hay Canyon Road Moro, OR 97039	T.2N. R.18E	28, 33
8600	Nancy Lewis	964A Kiely Blvd. Santa Clara, CA 95051	T.2N. R.18E	33
2900	Betty G. Parker	c/o Jan Parker 909 W. Heather Dr. Mesa, AZ 85201	T.2N. R.18E	15

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From: Dana Siegfried
To: John White
Date: 12/28/2005 12:31:24 PM
Subject: Fwd: RE: Klondike III Wetland Analysis Area revision

John, attached is an e-mail string and a memo we sent to DSL, asking if they agree that we amend the wetland study area to encompass a 300 foot corridor centered on the turbine strings. Jill Myatt indicates that, based on our original wetland study, her general understanding of the area, and the fact that our wildlife biologists/wetland delineators did examine the entire 300-foot corridor (albeit some of it while surveying for wildlife), that expanding the wetland study area would be OK, even without additional field work. We would owe you and DSL a map, and can get to that out early next week.

If this isn't an acceptable approach, then I think we could live with the condition that we avoid wetlands and verify no wetlands are present where the turbines are micrositied, provided we aren't looking at an amendment process. I think changing the study area map is cleaner, at least for micrositied within 300 foot corridor. Of course, between 150 and 450- feet from the centerline, we understand we will have the condition to avoid and verify wetlands.

Let us know, and thanks.

Dana Siegfried
David Evans and Associates
503.499.0369

>>> Ethan Rosenthal 12/28/2005 11:31 AM >>>
fyi, see attached.

CC: Ethan Rosenthal; Jesse Gronner



DAVID EVANS
AND ASSOCIATES INC.

MEMORANDUM

DATE: December 28, 2005
TO: Jill Myatt (Oregon Department of State Lands)
FROM: Ethan Rosenthal
SUBJECT: Wetland Analysis Area Boundary Revision
PROJECT: Klondike III Wind Power Project
PROJECT NO: PPME0000-0001
COPIES: Jesse Gronner

The purpose of this memorandum is to request a revision to the wetland analysis area boundary for the Klondike III Wind Power Project. The wetland delineation for this project was reviewed and concurred with by the Oregon Department of State Lands (DSL) as expressed in your letter to Jesse Gronner, with PPM Energy Inc. (PPM), dated September 26, 2005. The DSL identification number for the wetland delineation report is WD #05-0565.

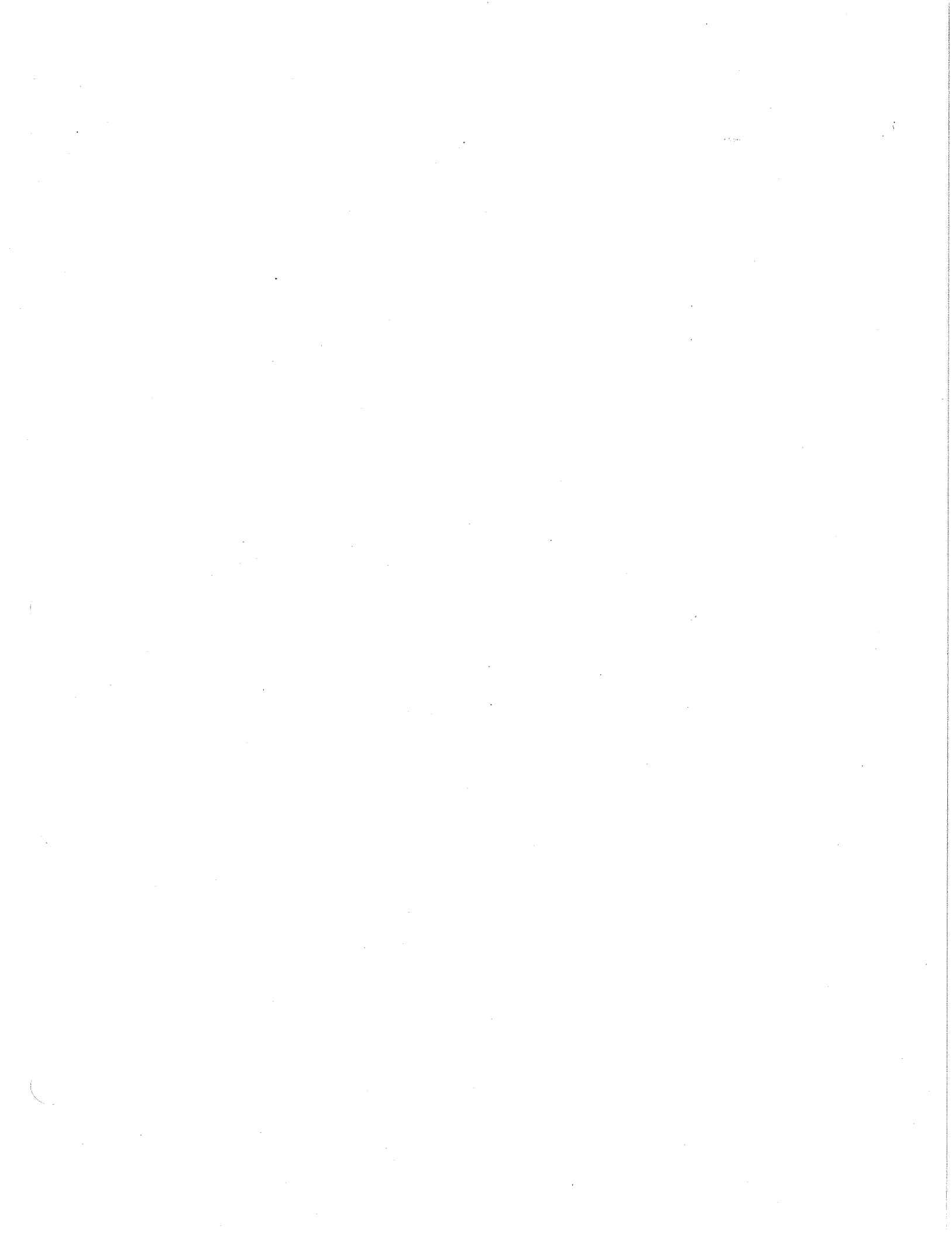
Currently, the wetland analysis area along the turbine strings consists of a 150 foot buffer around each individual turbine and a 30 foot buffer to each side of centerline of the associated roadway. This results in the current analysis area looking like a string of beads, with choke points that limit the ability to micro-site the turbines and associated roadway. On behalf of PPM, David Evans and Associates Inc. (DEA) is requesting that the wetland analysis area along all of the turbine strings be adjusted to 150 feet to each side of the centerline of the turbine strings. This would result in a consistent and continuous 300 foot wide corridor along each string.

The requested change in wetland analysis area boundary will not alter the findings of the wetland delineation (i.e. no new wetlands or waters of the state). The area along the turbine strings consists of a fairly homogenous landscape, with most of the site being farmed. This area of ground was reviewed out in the field as part of the original wetland delineation. In addition to the wetland fieldwork, wildlife surveys were also conducted (with staff knowledgeable in wetland identification) along all turbine strings and covered the entire area being requested for the revised wetland analysis area. Based on this knowledge of the site, the current sample plot coverage adequately addresses the new areas that would be brought into the revised wetland analysis area. Plots were located in areas along the turbine strings with the greatest potential for having wetlands (i.e. low spots and swales), yet no wetlands or waters of the state were identified along any of the proposed turbine strings.

We will provide a revised wetland delineation map early next week if DSL agrees the above information is adequate for DSL's concurrence with an expanded wetland analysis area.

Initials: ejro

File Name: C:\Temp\Memo-DSL wet_anlsys_bndry_rvsn 051228.doc



From: Dana Siegfried
To: John White
Date: 1/6/2006 10:30:46 AM
Subject: Fwd: RE: Klondike III Wetland Analysis Area revision

In response to 2 items below. I have copied portions of your e-mail here to aid in understanding what I am answering.

1A) At the very least, it seems to me that KIII would have to survey the proposed construction area and provide some form of confirmation that there would be no impact on any jurisdictional waters.

YES, THIS IS THE PLAN. NO IMPACT TO WETLANDS OUTSIDE OF 300 FEET, AS CONFIRMED BY SURVEY.

1B) what happens if KIII wants to build outside the 300-foot corridor and there would be an impact on a jurisdictional water.

WE AGREE THAT A WETLAND IMPACT WOULD REQUIRE AN AMENDMENT. THEREFORE, KIII WILL NOT WANT TO IMPACT ANY WETLANDS OUTSIDE THE 300 FOOT CORRIDOR. COUNCIL COULD PUT A CONDITION PROHIBITING SUCH IMPACT?

2) As a side note, I still need confirmation that the endpoint data that you described to define the 300-foot (and 900-foot) corridors are the end turbines on all of the site maps previously submitted in the application. This would include the wetland delineation maps. This will confirm that the location of the wetland study area corresponds to the turbine corridors that would be approved in a site certificate.

YES, THE ENDPOINT DATA FOR THE CORRIDORS ARE THE END TURBINES ON ALL OF THE SITE MAPS SUBMITTED SO FAR, INCLUDING WETLANDS.

Dana Siegfried
David Evans and Associates
503.499.0369

>>> "John White" <John.White@state.or.us> 12/28/2005 4:03 PM >>>

Dana,

We would need a new concurrence letter from DSL. As our record now stands, DSL has concurred with the delineation described in that the September 26 letter from Jill Myatt, and that delineation was based on the study area described in the original report (Application Appendix J-1). Your proposal is to widen the study area to describe a 300-foot corridor centered on the turbine strings. If DSL signs off on a finding that there are no wetlands or jurisdictional waters within the wider study area, aside from those identified in Jill's September 26 letter, then the approach you describe would be acceptable to ODOE. We would defer to DSL's expertise. The Council would be able to make a finding that there is only one wetland subject to the Removal-Fill law, taking into account the 300-foot turbine corridors, based on the concurrence from DSL.

If KIII wanted to microsite a turbine (or any related facility, including access roads or buried cable) outside of the 300-foot corridors, then my concern is how a decision is made that no Removal-Fill permit is needed. Ordinarily, that is something that the Siting Council decides before issuing a site certificate. At the very least, it seems to me that KIII would have to survey the proposed construction area and provide some form of confirmation that there would be no impact on any jurisdictional waters. In other words, at the time the site certificate is issued, the Council would be able to conclude that no permit is required for the wetland identified in the wetland study area AND construction outside that area would not affect wetlands or other jurisdictional waters (with verification by condition). Assuming that this much is legally proper (and I will have to confirm that with DOJ before including any of this in a draft proposed order), it still leaves the question of what happens if KIII wants to build outside the 300-foot corridor and there would be an impact on a jurisdictional water. It is a legal question in that case whether DSL could issue a permit (if one is needed) or would be bound by the site certificate. If DSL could not issue a permit in that situation, then would a site certificate amendment be needed?

As a side note, I still need confirmation that the endpoint data that you described to define the 300-foot (and 900-foot) corridors are the end turbines on all of the site maps previously submitted in the application. This would include the wetland delineation maps. This will confirm that the location of the wetland study area corresponds to the turbine corridors that would be approved in a site certificate.

I will be away from the office until January 3. Have a safe, but joyous, New Years Eve.

-John

John G. White
Oregon Department of Energy
625 Marion St., NE
Salem, Oregon 97301-3742
john.white@state.or.us

>>> "Dana Siegfried" <Dns@deainc.com> 12/28/05 12:31PM >>>
John, attached is an e-mail string and a memo we sent to DSL, asking if they agree that we amend the wetland study area to encompass a 300 foot corridor centered on the turbine strings. Jill Myatt indicates that, based on our original wetland study, her general understanding of the area, and the fact that our wildlife biologists/wetland delineators did examine the entire 300-foot corridor (albeit some of it while surveying for wildlife), that expanding the wetland study area would be OK, even without additional field work. We would owe you and DSL a map, and can get to that out early next week.

If this isn't an acceptable approach, then I think we could live with the condition that we avoid wetlands and verify no wetlands are present where the turbines are micrositied, provided we aren't looking at an amendment process. I think changing the study area map is cleaner, at least for micrositied within 300 foot corridor. Of course, between 150 and 450- feet from the centerline, we understand we will have the

condition to avoid and verify wetlands.

Let us know, and thanks.

Dana Siegfried
David Evans and Associates
503.499.0369

>>> Ethan Rosenthal 12/28/2005 11:31 AM >>>
fyi, see attached.

CC: Jesse Gronner

"Yes" to force significant change.

Simante 198
Klondike III Wind Power Project
Farmer Survey

Date : 3-1-05
Name : Roland: Simon Simante! (son: Robert (sons)
Address : P.O. Box 364 Wasco, Or. 97065
Telephone Number : Day 541-442-5414 Shop Evening 541-442-5381

Farm Survey for Klondike III Wind Power Project

- 1. Are you the property owner? Yes No
- 2. Do you farm the property? Yes No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

- 3. Do you live on the property? *in Wasco* Yes No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

- 4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?

- 5. How much of your parcel is actively farmed?
All

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

2600 - 2800

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

Wheat & Barley

How many crop(s) annually could you grow?

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

Yes

If moved from another location, which public roads and access points to your property are used?

How frequently and at what time of day or year do you need access to those roads?

Early Morning

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not? no

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not? yes

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

parcel 493

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? _____

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? Yes _____

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No _____

Comments:

Mailyn Clark
Judy Probstfield

Klondike III Wind Power Project
Farmer Survey

Clark/Probstfield 1/7/05

Date : 3-1-05
Name : Scott Robson - US Bank
Address : 428 Riverside Ave Spokane, WA 99201
Telephone Number : Day 509-353-7092
Evening 800-231-4888

Farm Survey for Klondike III Wind Power Project

1. Are you the property owner? Yes No
2. Do you farm the property? Yes No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

3. Do you live on the property? Yes No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?

1734 — 1600 tillable including 265 acres CRP
Gross

5. How much of your parcel is actively farmed?

1600 - 265 = 1335

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

150 acres pasture
25% of grazing land

6. What is the total size of the land you own and/or farm in Sherman County?

1734

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

Walker 1250 acres Morgan Trust 640 acres
Powell 440 acres Ray Smith

7. What crop(s) do you grow on this parcel?

Spring Barley : wheat

How many crop(s) annually could you grow?

Spring Barley : wheat 45 bushel acre
50's 140's

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

Some equipment stays some brought
not Decatur drills along Smith Road

If moved from another location, which public roads and access points to your property are used?

Smith Road

How frequently and at what time of day or year do you need access to those roads?

Early in day - Harsh - Oct.

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not? Will take longer to farm because of the corners. Several fields will now be created. More edges, weeds, Add dams to eliminate grass water ways. CRP ground. Less efficient to farm.

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not? Loss efficiency - 5% loss in yield and time

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

Klondike III Wind Power Project
Farmer Survey

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? _____

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? Not significant

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No

Comments:

2-2-05 - 10:30 AM - NICK WALK - tenant farmer - meet with
Rodney Walk - Owner Klondike III Wind Power Project
Farmer Survey

Date : 3-2-05
Name : Rodney M. Walk & Lynette K. Walk Trustees
Address : 31530 Sodaville Rd Lebanon Or 97355
Telephone Number : ^{Nick} Day 541-442-5470 Evening _____

Farm Survey for Klondike III Wind Power Project

1. Are you the property owner? ^{Met with} (tenant farmer) Yes No
2. Do you farm the property? Yes No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

3. Do you live on the property? Yes No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?

160 acres

5. How much of your parcel is actively farmed?

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

1040

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

Wheat (Pouluy)

How many crop(s) annually could you grow?

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

If moved from another location, which public roads and access points to your property are used?

Klondike Cove / North Klondike Ridge / Hilderbrand Lane

How frequently and at what time of day or year do you need access to those roads?

Early morning

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not?

No

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not?

No

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

Klondike III Wind Power Project
Farmer Survey

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? No

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? No

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No _____

Comments:

Frank & Deanna Zanicki - Owner
Klondike III Wind Power Project
Farmer Survey

Date : 3-2-05
Name : Frank & Deanna Zanicki
Address : 901 Richmond St. The Dalles, Or. 97058
Telephone Number : Day 541-296-7708 Evening _____

Farm Survey for Klondike III Wind Power Project

- 1. Are you the property owner? Yes No
- 2. Do you farm the property? Yes No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

- 3. Do you live on the property? Yes No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

- 4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?
800

- 5. How much of your parcel is actively farmed?
800

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

200

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

wheat / Barley

How many crop(s) annually could you grow?

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

Yes

If moved from another location, which public roads and access points to your property are used?

Rayburn

How frequently and at what time of day or year do you need access to those roads?

Early Morning - Mar - Oct

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not?

No

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not?

No

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? Yes

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? No

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No

Comments:

2-2-05 7:00 AM - Jesse Stutzman (landowner) Meet with
Richard Jones; Robert Jones Klondike III Wind Power Project
Farmer Survey

Date : 3-2-05
Name : Richard E. Jones; Robert C. Jones Jr.
Address : 1928 S. Century Lane Spokane Valley, WA 99037
Telephone Number : ^{Jesse} Day 541-980-4447 Evening _____

Farm Survey for Klondike III Wind Power Project

1. Are you the property owner? Yes _____ No _____
2. Do you farm the property? Yes _____ No _____

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

3. Do you live on the property? Yes _____ No _____

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?

5. How much of your parcel is actively farmed?

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

How many crop(s) annually could you grow?

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

If moved from another location, which public roads and access points to your property are used?

How frequently and at what time of day or year do you need access to those roads?

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not? _____

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not? _____

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? _____

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? _____

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No _____

Comments:

*Nancy Fane
Gerry Harbor*

Date : 3-2-05
Name : Nancy M. Fane Trustee & Richard G. Harbor : Gerry H Harbor Trustee
Address : 23860 Long Valley Rd Hidden Hills, CA. 91302
Telephone Number : ^{Jesse} ~~Day~~ 541-980-4447 Evening _____

Farm Survey for Klondike III Wind Power Project

- 1. Are you the property owner? Yes No
- 2. Do you farm the property? Jesse Stutzman Yes No
tenant

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

- 3. Do you live on the property? Yes No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

- 4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?
480 acres

- 5. How much of your parcel is actively farmed?
All

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

480

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

Wheat / Barley

How many crop(s) annually could you grow?

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

No

If moved from another location, which public roads and access points to your property are used?

Klondike Ave

How frequently and at what time of day or year do you need access to those roads?

morning - March to October

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not? *no*

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not? *no*

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? yes

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? no

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No

Comments:

Nancy Lewis

(KRONI FARMER) MEET WITH
Klondike III Wind Power Project
Farmer Survey

Date : 3-2-05
Name : Nancy Lewis
Address : 964A Kiely Blvd. Santa Clara, Ca. 95051
Telephone Number : ~~Day~~ Jay Lewis (sm) - 503-696-4288
Evening: Guy Westman - 521-525-3491

Farm Survey for Klondike III Wind Power Project

1. Are you the property owner? Yes No
2. Do you farm the property? Tenant Farm Yes No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

3. Do you live on the property? Yes No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?
180 ac

5. How much of your parcel is actively farmed?
180 ac

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

7000 acrs - Weedman

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

Wheat & Barley

How many crop(s) annually could you grow?

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

No

If moved from another location, which public roads and access points to your property are used?

Gosson Lane

How frequently and at what time of day or year do you need access to those roads?

Varies use of County roads

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not? *No*

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not? *Little more hassle to farm around.*

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? Yes

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? No

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No /

Comments:

Date : 3-1-05
Name : Elizabeth Thomas (Dan Thomas - son)
Address : 3564 East 2nd #61 The Dalles, Or. 97058
Telephone Number : ^{Dan Thomas} Day 541-298-5278 Evening _____

Farm Survey for Klondike III Wind Power Project

1. Are you the property owner? *Dan son of Elizabeth Thomas* Yes No
2. Do you farm the property? *Tenant Farmed* Yes No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

3. Do you live on the property? Yes No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?

640 acres

5. How much of your parcel is actively farmed?

75 acres CRP 640
75
565 acres farmed
CRP on Thomas Property

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

240 acres

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

wheat / barley

How many crop(s) annually could you grow?

40 - 50 bushel per acre

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

Egypt or Sandon or Cassan Lane

If moved from another location, which public roads and access points to your property are used?

How frequently and at what time of day or year do you need access to those roads?

_____ *March July Sept* _____
_____ *More Equipment at night when less traffic* _____

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not? _____ *No* _____

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not? _____ *Not Significant* _____

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? Yes

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? No

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No _____

Comments:

2-2-05 - 10:00 AM - Terry Kaseberg

Klondike III Wind Power Project
Farmer Survey

Date : 3-2-05
Name : Lee: Terry Kaseberg
Address : 70031 Van Gilder Rd Wasco, Or 97065
Telephone Number : ^{Lee - Shop} Day 541-442-5516 ^{Terry} Evening 541-442-5243

Farm Survey for Klondike III Wind Power Project

1. Are you the property owner? Yes No
2. Do you farm the property? Yes No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

3. Do you live on the property? Yes No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?

3/4 Section

5. How much of your parcel is actively farmed?

480 465 Acres - 350 Crop Land

90 acres CRP

Klondike III Wind Power Project
Farmer Survey

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County? 5200^d

365 <hr/> 289 654 <hr/> 348 1002	5200 farm 859 lease 1002	289 160 <hr/> 449 110 559 300 859	1861 <hr/> 1861	OWN <hr/> <u>73329</u>
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Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

wheat! barley

How many crop(s) annually could you grow?

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

If moved from another location, which public roads and access points to your property are used?

Klondike Lane

How frequently and at what time of day or year do you need access to those roads?

Early Morning

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not? *Minimal*

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not? *No*

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? Yes

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? No

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No _____

Comments:

3105 - 5100th - Art Stowers

174

Klondike III Wind Power Project
Farmer Survey

Date : 3-1-05
Name : Art Stowers
Address : _____
Telephone Number : Day _____ Evening _____

Farm Survey for Klondike III Wind Power Project

- 1. Are you the property owner? Yes No
- 2. Do you farm the property? *tenant farmer* Yes No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

- 3. Do you live on the property? *tenant does* *2 residences* Yes No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

- 4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?
3900 - 1100 CRP - 400 Pasture 2500

- 5. How much of your parcel is actively farmed?

ALT Situations

Klondike III Wind Power Project
Farmer Survey

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

wheat: barley

How many crop(s) annually could you grow?

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

Yes

If moved from another location, which public roads and access points to your property are used?

AKY STEVENSON

**Klondike III Wind Power Project
Farmer Survey**

How frequently and at what time of day or year do you need access to those roads?

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not? _____

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not? Yes

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

Act 5/20/05, 6/1/05

**Klondike III Wind Power Project
Farmer Survey**

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? _____

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? _____

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No _____

Comments:

3-1 - 3:00 PM Daryl Melzer - meet with

He... ..

Klondike III Wind Power Project
Farmer Survey

Date : 3-1-05
Name : Vernon Virginia Melzer (Daryl Melzer)*
Address : P.O. Box 41 Wasco, Or. 97065
Telephone Number : Day 541-442-5439 Evening Daryl 541-442-5248

Farm Survey for Klondike III Wind Power Project

- 1. Are you the property owner? Yes No
- 2. Do you farm the property? Yes No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

- 3. Do you live on the property? Yes No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

- 4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?

- 5. How much of your parcel is actively farmed?
All _____

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2000000
orab...

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Klondike III Wind Power Project
Farmer Survey

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

43 bushel acre last ten years

How many crop(s) annually could you grow?

900 / yr.

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

Yes

If moved from another location, which public roads and access points to your property are used?



Heizer 2009

Klondike III Wind Power Project
Farmer Survey

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

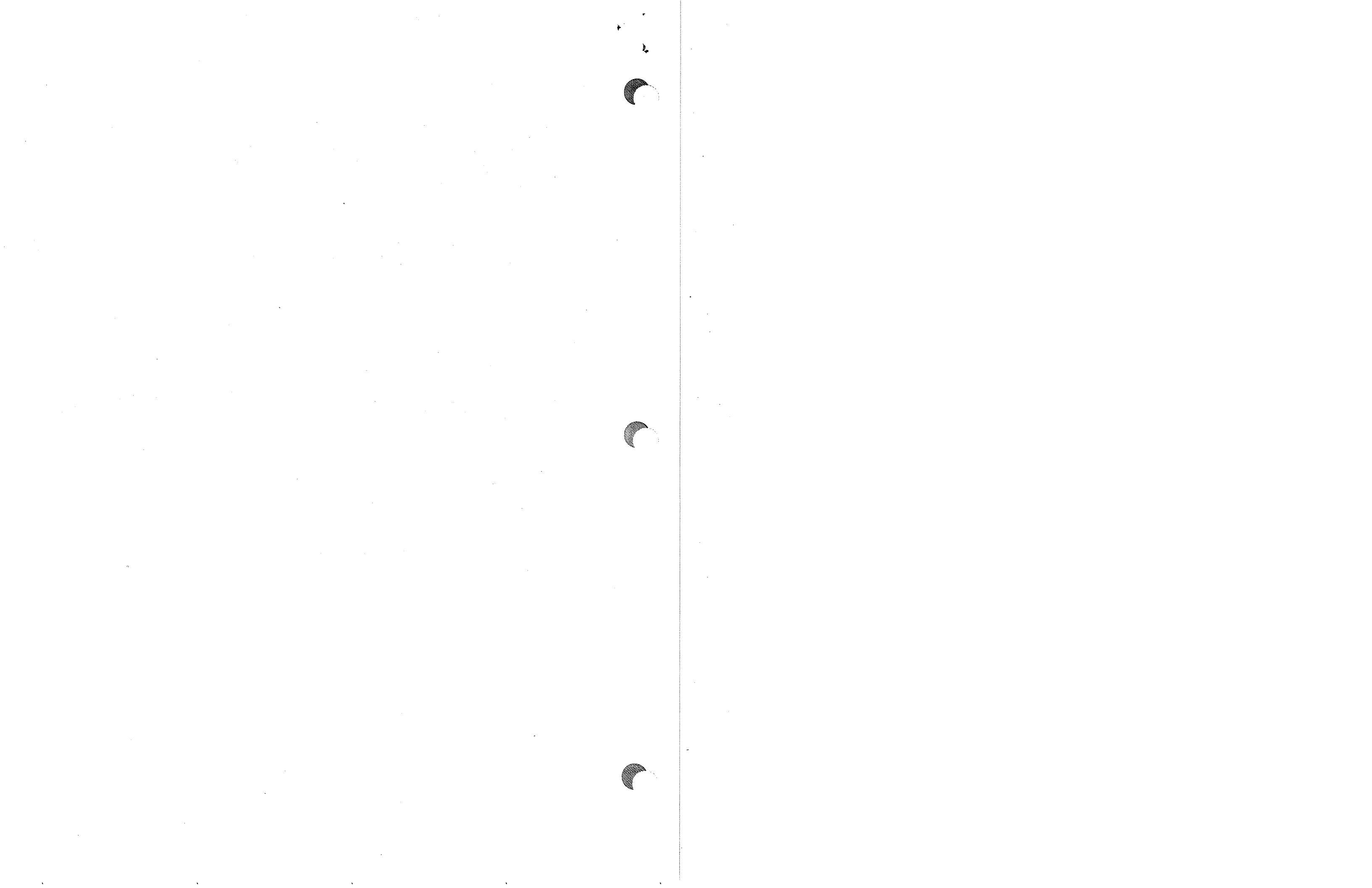
Why or why not? _____

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? _____

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No _____

Comments:



3-2-05 - Noon - Tom Coats - lawyer - Weir Trust
Kent Thomas - Tenant Farmer

Week 124

Klondike III Wind Power Project
Farmer Survey

Date : 3-2-05
Name : James Weir Memorial Fund
Address : c/o J. Thomas Coats
113 "A" E. Spruce St. The Dalles, OR 97058
Telephone Number : Day 541-298-2680 Evening _____

Farm Survey for Klondike III Wind Power Project

- 1. Are you the property owner? Yes _____ No
- 2. Do you farm the property? Kent Thomas Tenant Farmer Yes _____ No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

- 3. Do you live on the property? Yes _____ No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

- 4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?

480

- 5. How much of your parcel is actively farmed?

480

with 7/21/11

Klondike III Wind Power Project
Farmer Survey

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

1280

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

1/3

7. What crop(s) do you grow on this parcel?

Wheat & Barley

How many crop(s) annually could you grow?

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

no

If moved from another location, which public roads and access points to your property are used?

N Klondike Lane & Webb Post & Farm Grant Road

Klondike III Wind Power Project
Farmer Survey

How frequently and at what time of day or year do you need access to those roads?

Early Morning -

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not? No

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not? No

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

Dec 4 2005

Klondike III Wind Power Project
Farmer Survey

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? yes

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? U.

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No ✓

Comments:

To: [Redacted]

From: Jessie Casswell

Questionnaires	—	Alz Stevens	4 pages
		Vernon Hansen	4 pages
		Will Trust	4 pages

13 Including Cover Page

3-1-05 - 5:00 PM - Art Stowers

174

Klondike III Wind Power Project
Farmer Survey

Date : 3-1-05
Name : Art Stowers
Address : _____
Telephone Number : Day _____ Evening _____

Farm Survey for Klondike III Wind Power Project

- 1. Are you the property owner? Yes No _____
- 2. Do you farm the property? *part farm* Yes No _____

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

- 3. Do you live on the property? *part does* *residence* Yes _____ No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

- 4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?

3900 - 1100 CRF - 400 Pasture 2500

- 5. How much of your parcel is actively farmed?

Alt Sherman

Klondike III Wind Power Project
Farmer Survey

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

wheat, barley

How many crop(s) annually could you grow?

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

Yes

If moved from another location, which public roads and access points to your property are used?

Art Stevens

**Klondike III Wind Power Project
Farmer Survey**

How frequently and at what time of day or year do you need access to those roads?

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not? _____

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not? Yes _____

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

Act 5000000000

**Klondike III Wind Power Project
Farmer Survey**

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? _____

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? _____

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No _____

Comments:

3-2-05 - Noon - Tom Coats - lawyer - Weir Trust
Kent Thomas - Tenant Farmer

Week 124

Klondike III Wind Power Project
Farmer Survey

Date : 3-2-05
Name : James Weir Memorial Fund
Address : c/o J. Thomas Coats
113 "A" E. Spruce St. The Dalles, OR 97058
Telephone Number : Day 541-298-2680 Evening

Farm Survey for Klondike III Wind Power Project

- 1. Are you the property owner? Yes _____ No
- 2. Do you farm the property? *Kent Thomas Tenant Farmer* Yes _____ No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____
Address: _____
Phone: _____

- 3. Do you live on the property? Yes _____ No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

- 4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?

480

- 5. How much of your parcel is actively farmed?

480

LC# 724

Klondike III Wind Power Project
Farmer Survey

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

1280

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

1/3

7. What crop(s) do you grow on this parcel?

Wheat & Barley

How many crop(s) annually could you grow?

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

no

If moved from another location, which public roads and access points to your property are used?

N Klondike Lane & Hobbs Rd & Farm Road

Klondike III Wind Power Project
Farmer Survey

How frequently and at what time of day or year do you need access to those roads?

Early Morning -

9. Do you think the location of the wind turbines and the maintenance roads will negatively affect your ability or increase the cost of farming your parcel?

Why or why not? No

10. Do you expect the loss of agricultural land as a result of the project to have a significant negative impact on the annual revenues you earn from your farming operations?

Why or why not? No

11. Would you be willing to estimate the net cost or benefit of the project to you in terms of agricultural revenue as well as revenue from leasing the land for the wind power project?

If "yes," please estimate the net cost or benefit to you.

Page 4 of 4

Klondike III Wind Power Project
Farmer Survey

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

Why or why not? yes

14. Will the location of the wind turbines force a significant change in farming practices on your land?

If so, why? U

15. Will the location of the wind turbines significantly increase the cost of farming your property?

Yes _____ No

Comments:

3-1 - 3:00 PM Daryl Melzer - meet with

Melzer

Klondike III Wind Power Project
Farmer Survey

Date : 3-1-05

Name : Vernon : Virginia Melzer (Daryl Melzer)*

Address : P.O. Box 41 Wasco, OR 97065

Telephone Number : Day 541-442-5439 Evening Daryl 541-442-5248

Farm Survey for Klondike III Wind Power Project

1. Are you the property owner? Yes No

2. Do you farm the property? Yes No

If you do not farm the property, please provide the name, address, and telephone number of the farm operator.

Name: _____

Address: _____

Phone: _____

3. Do you live on the property? Yes No

Some of the turbines for the wind power project are proposed to be constructed on the property you own and/or farm, or on adjacent property. The following questions will help us understand how both the construction of the project and the presence of the turbines and new maintenance roads may affect your farming operations, costs and facilities.

4. How large is the parcel (or parcels) that you own and/or farm that are affected by the project?

5. How much of your parcel is actively farmed?

All _____

2000000
2000000
not farmed

HELZEN

Klondike III Wind Power Project
Farmer Survey

If not all of the parcel is farmed, is the area not farmed suitable for farming, or are there constraints (such as poor soils, steep slopes) that make it unsuitable?

6. What is the total size of the land you own and/or farm in Sherman County?

Approximately what proportion of your business in terms of acreage or income does the affected parcel represent?

7. What crop(s) do you grow on this parcel?

43 bushel acre last ten years

How many crop(s) annually could you grow?

900 / yr.

8. Is the equipment or machinery used to farm the crop(s) kept on the property, or is it moved from another location?

Yes

If moved from another location, which public roads and access points to your property are used?



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Klondike III Wind Power Project
Farmer Survey

12. If not willing to estimate, do you agree or disagree with estimates of net costs provided by wheat farmers affected by Klondike I project? They estimated annual losses of approximately \$125 per turbine, based on loss of 1/2 acre of farmed land, 25 bushels of wheat per 1/2 acre at \$5 per bushel.

Agree _____ Disagree _____

13. Do you think the location of the wind turbines and roads that will be built to access the turbines are compatible with your ability to farm your parcel?

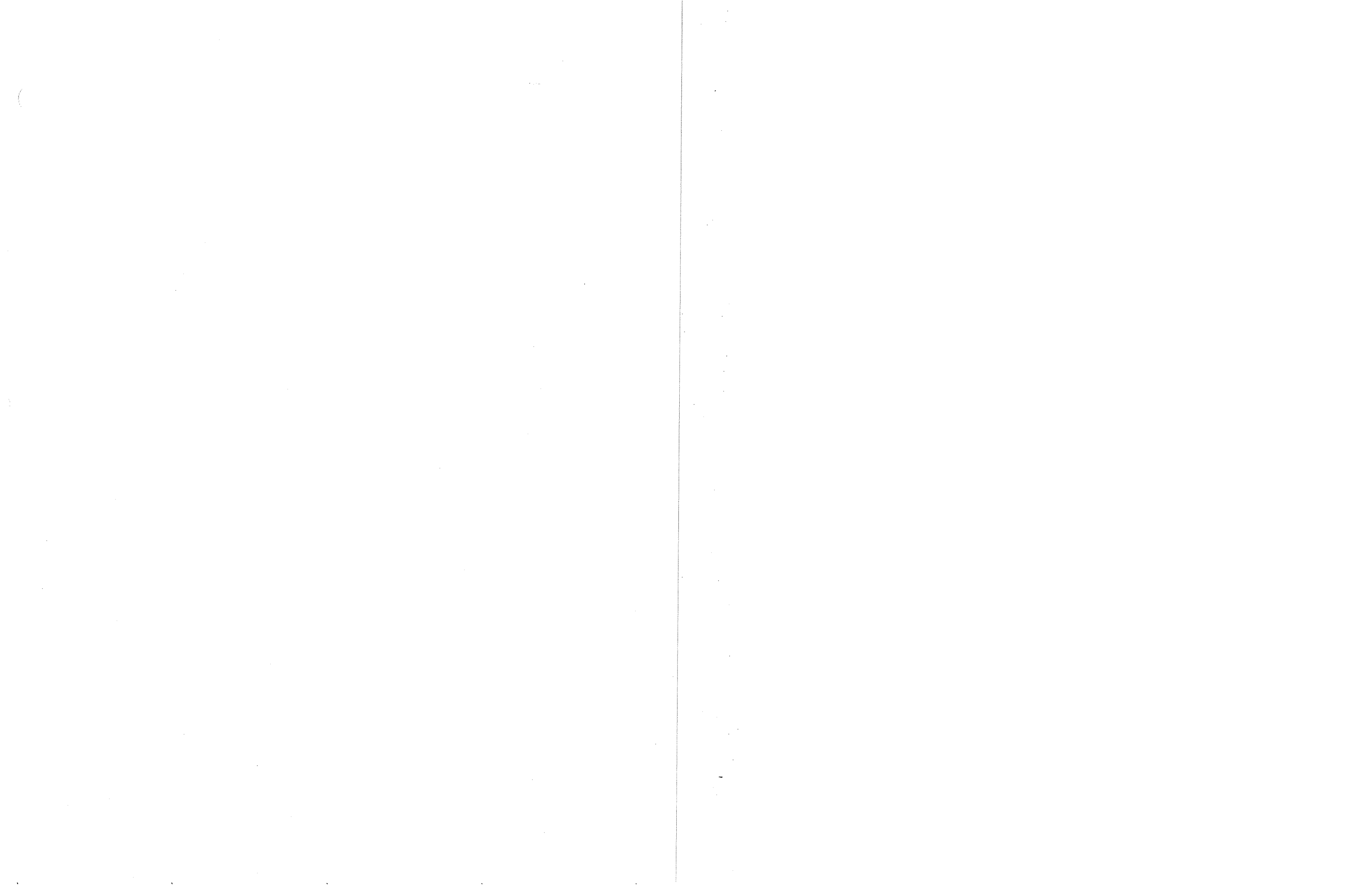
Why or why not? _____

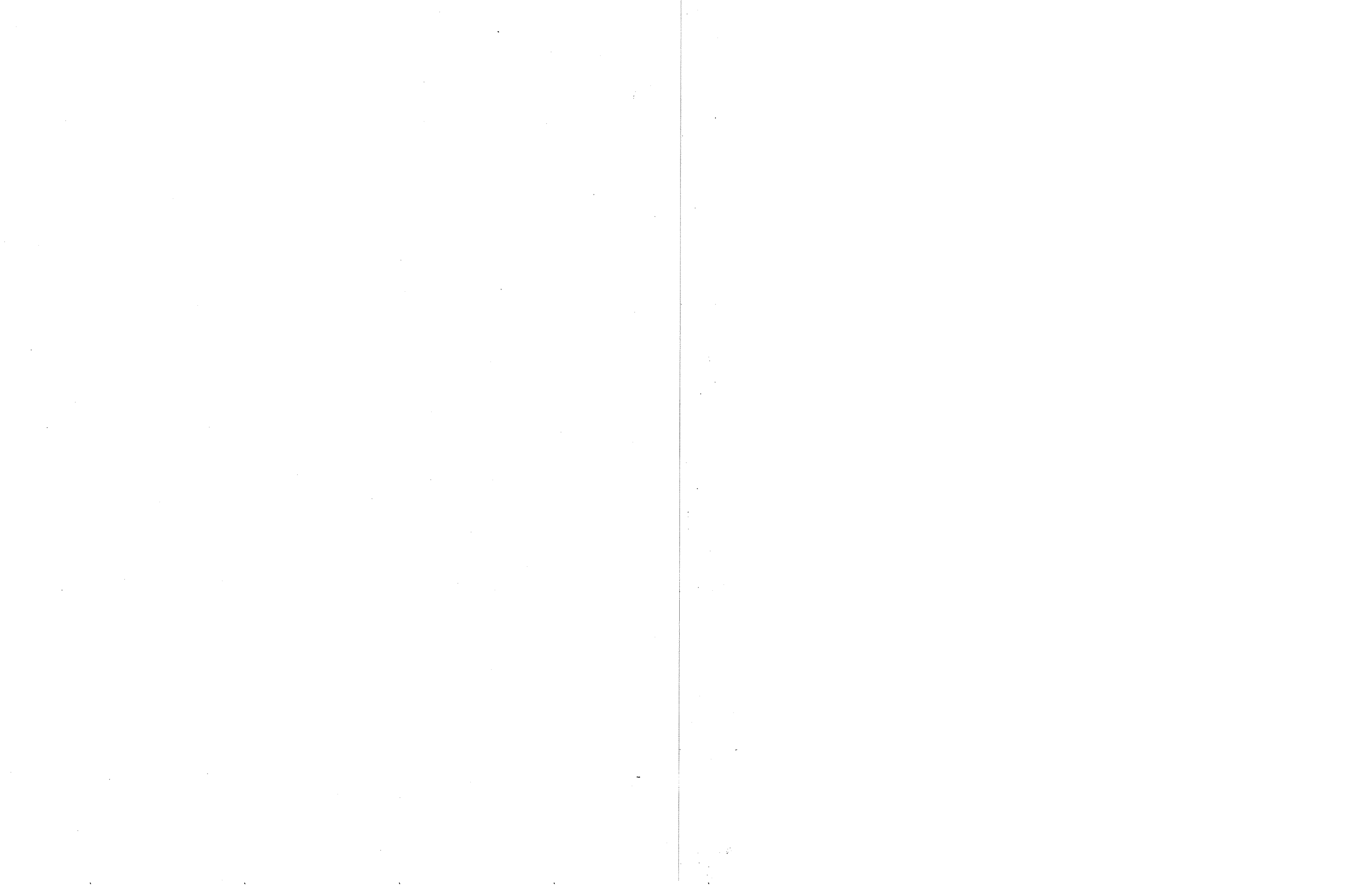
14. Will the location of the wind turbines force a significant change in farming practices on your land?

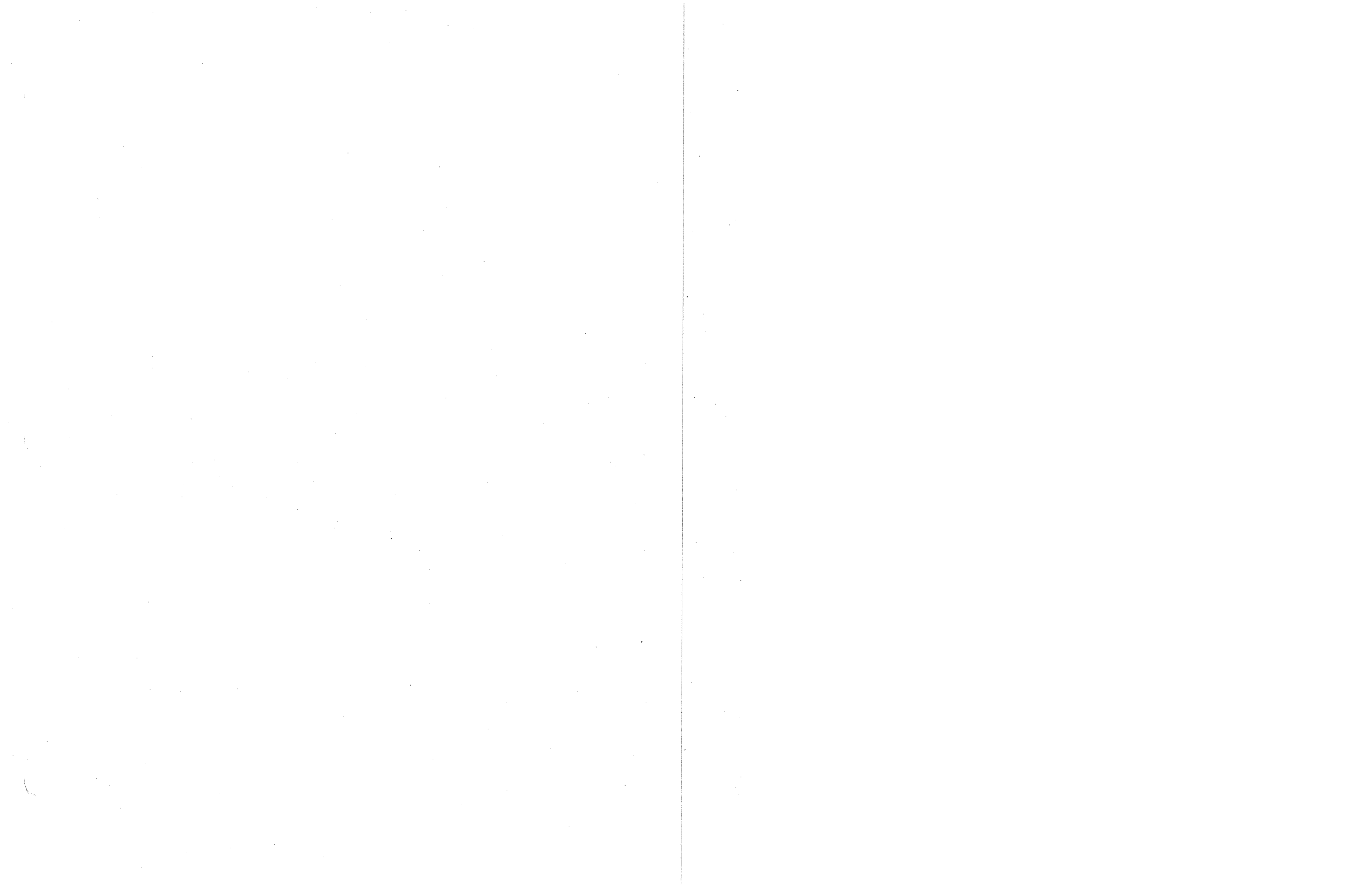
If so, why? _____

15. Will the location of the wind turbines significantly increase the cost of farming your property? Yes _____ No _____

Comments:

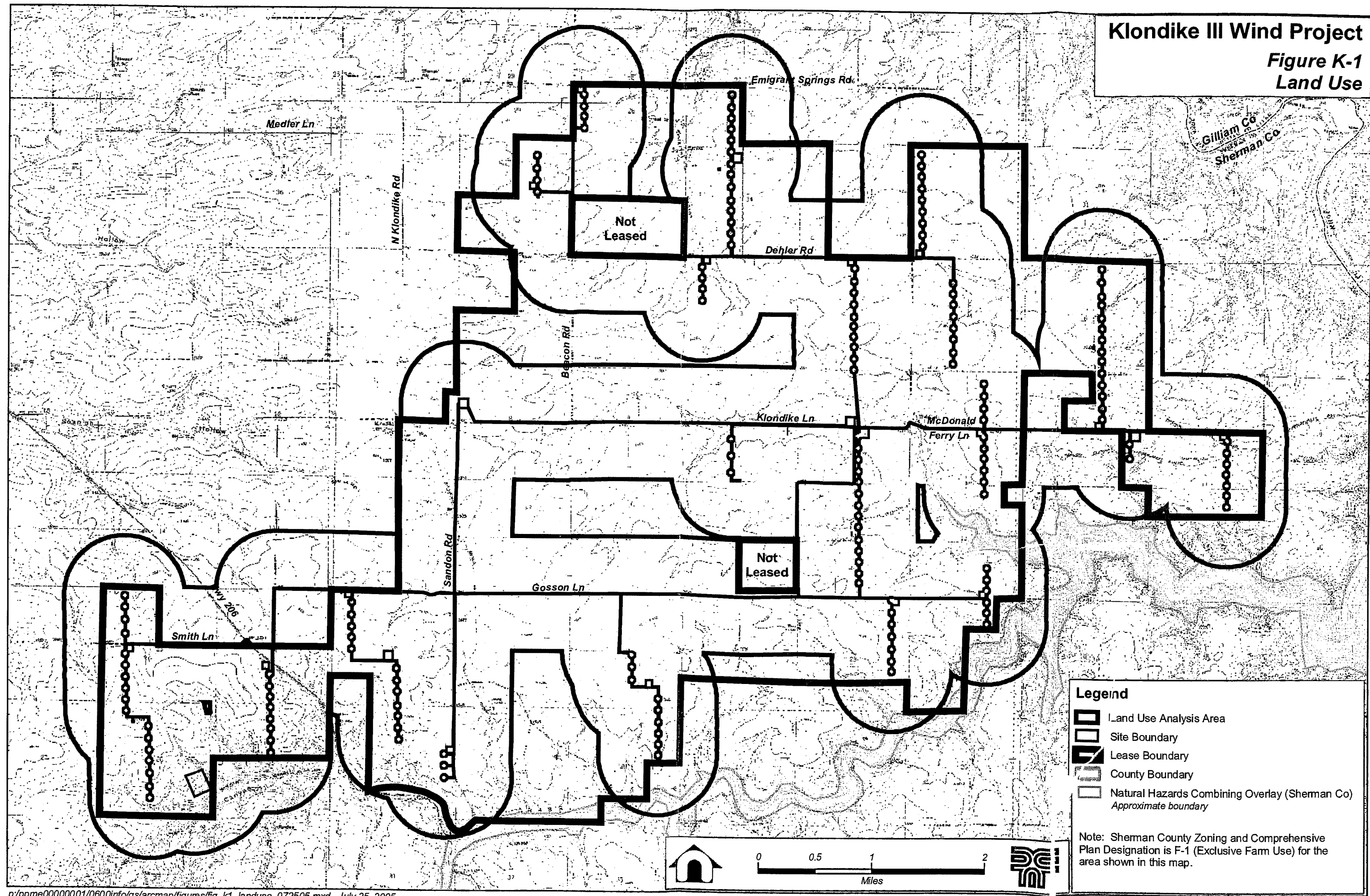






Klondike III Wind Project
Figure K-1
Land Use

Gilliam Co
 Sherman Co



Legend

- Land Use Analysis Area
- Site Boundary
- Lease Boundary
- County Boundary
- Natural Hazards Combining Overlay (Sherman Co) *Approximate boundary*

Note: Sherman County Zoning and Comprehensive Plan Designation is F-1 (Exclusive Farm Use) for the area shown in this map.

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REVISED EXHIBIT L

KLONDIKE III WIND PROJECT

October 7, 2005



DAVID EVANS AND ASSOCIATES INC.

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3

EXHIBIT L

IMPACTS ON PROTECTED AREAS

OAR 345-021-0010(1)(L)

TABLE OF CONTENTS

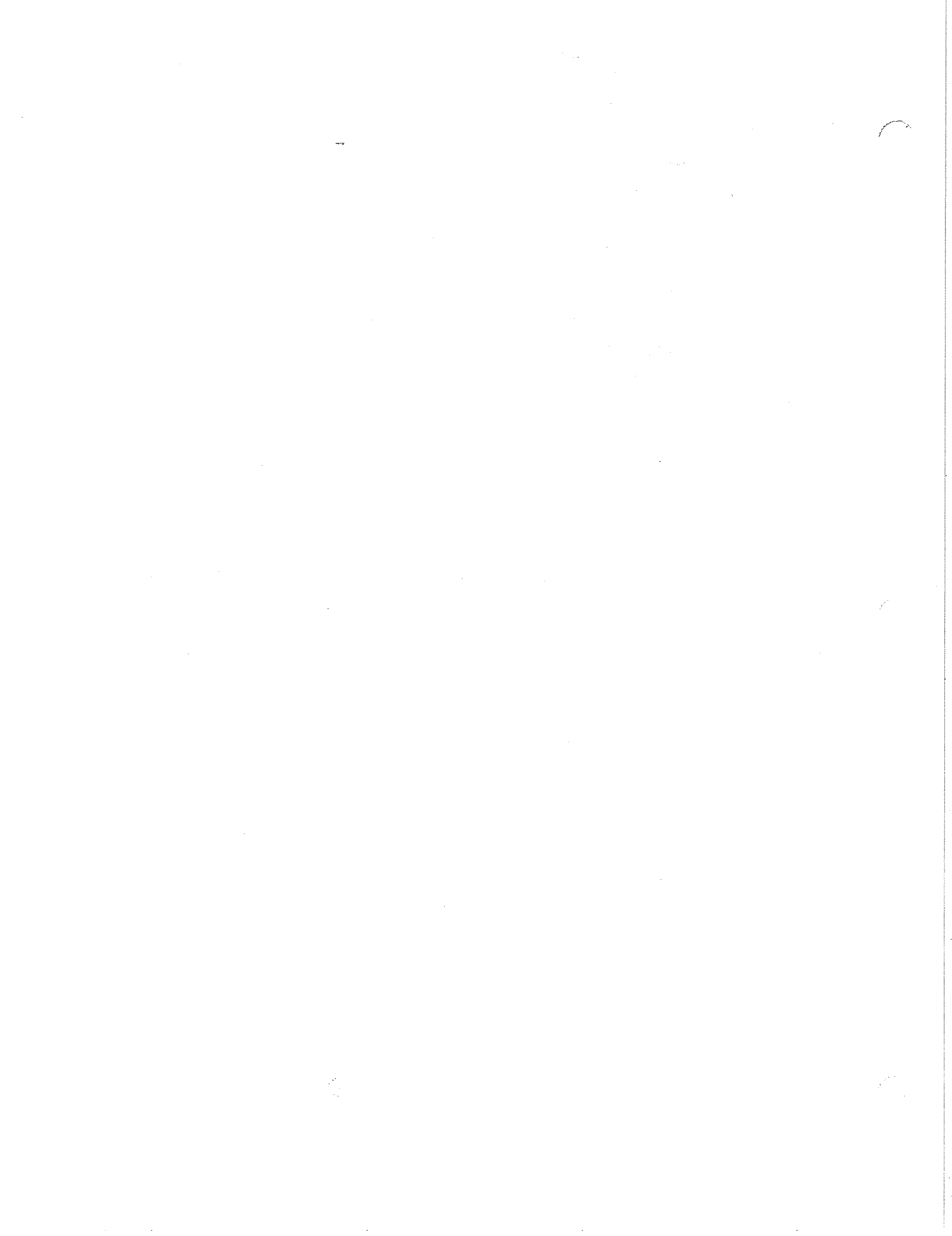
	Page
L.1 INTRODUCTION.....	1
L.2 MAP OF PROPOSED FACILITY IN RELATION TO PROTECTED AREAS... 1	1
L.3 POTENTIAL IMPACTS.....	2
L.4 CONCLUSION	7
L.5 REFERENCES	7
L.5.1 Telephone Contacts/Personal Interviews	7
L.5.2 Website/Document References	8

TABLES

Table L- 1. Protected Areas Within Analysis Area and Their Approximate Minimum Distance from the Proposed Facility	2
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APPENDICES

L-1 FIGURES L-1 THROUGH L-4	
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Foreword

Exhibit L was originally submitted in May 2005 as part of the application made by Klondike Wind Power III LLC to the Oregon Department of Energy (ODOE) for approval of the 273 MW Klondike III Wind Project. This Exhibit has been revised in response to Request for Additional Information No. 2 submitted by ODOE to the Applicant on September 15, 2005. The Exhibit has been revised to extend the analysis area into Washington.¹

L.1 INTRODUCTION

Exhibit L addresses impacts the proposed facility would have on Protected Areas in the analysis area. The exhibit responds to the requirements of OAR 345-021-0010(1)(L), as follows:

OAR 345-021-0010(1)(L) *Information about the proposed facility's impact on Protected Areas, providing evidence to support a finding by the Council as required by OAR 345-022-0040, including:*

Response: OAR 345-022-0040 requires that the application for site certificate for the proposed energy facility address impacts to Protected Areas as defined in OAR 345-022-0040(1)(a)(p). Except under special circumstances defined in OAR 345-022-0040(2), the Council will not issue a site certificate for a proposed facility located in a Protected Area. For facilities located outside these areas, the Council “must find that, taking into account mitigation, the design, construction, and operation of the facility are not likely to result in significant adverse impact [to Protected Areas]”.

This Exhibit is organized in accordance with the application requirements contained in OAR 345-021-0010(1)(L) and provides evidence to support a finding by the Council as required by OAR 345-022-0040. All figures cited herein are included in Appendix L-1.

L.2 MAP OF PROPOSED FACILITY IN RELATION TO PROTECTED AREAS

OAR 345-021-0010(1)(L)(A) *A map showing the location of the proposed facility in relation to the Protected Areas listed in OAR 345-022-0040 located within the analysis area:*

¹ In its Second Request for Additional Information, the Department of Energy took the position that the analysis area for impacts to Protected Areas discussed in this Exhibit L includes the area within the site boundary and 20 miles from the site boundary, including resources that are in Washington, and further requested that this Exhibit L provide an analysis of any Protected Areas within the analysis area in Washington. While the Applicant has provided the requested information and analysis for Washington in this revised Exhibit L, the Applicant hereby reserves and expressly does not waive the right to argue, if necessary, that the analysis area should not extend into Washington, that the applicable statutes and rules do not require an analysis of Protected Areas in Washington, and that the Energy Facility Siting Commission findings with respect to the requirements contained in OAR 345-022-0040 need not take into account such analysis.



Response: The analysis area for impacts on Protected Areas includes the area within the site boundary and extends 20 miles beyond the site boundary in Oregon. As requested by ODOE, the analysis area has been expanded into Washington. Figures L-1 and L-2 illustrate the analysis area and 12 identified Protected Areas in Oregon and four identified Protected Areas in Washington, respectively. Table L-1 lists these Protected Areas and their approximate minimum distance from the proposed facility.

Table L- 1. Protected Areas Within Analysis Area and Their Approximate Minimum Distance from the Proposed Facility

Protected Area	Direction and Distance from Klondike III site (miles)
John Day Wildlife Refuge (Oregon)	East, 0.8
Columbia River Gorge National Scenic Area (Oregon and Washington)	NW, 12.2
Deschutes River State Recreation Area (Oregon)	NW, 12.9
Heritage Landing (Deschutes) (Oregon)	NW, 13.5
JS Burrell State Recreation Site/BLM Cottonwood Facility (Oregon)	SE, 6.0
John Day Federal Wild and Scenic River (Oregon)	E, 1.0
John Day State Scenic Waterway (Parrish Creek to Tumwater Falls) (Oregon)	E, 1.1
Deschutes Federal Wild and Scenic River (Oregon)	W, 8.0
Deschutes State Scenic Waterway (Pelton Dam to Columbia River) (Oregon)	W, 8.1
Columbia Basin Agriculture Research Center (Moro, Oregon)	SW, 5.0
Horn Butte Area of Critical Environmental Concern (ACEC) (Oregon)	E/NE, 19.3
Lower Deschutes Wildlife Area (Oregon)	W, 7.4
Goldendale Observatory State Park (Washington)	NNE, 13.5
Maryhill State Park (Washington)	NE, 12
Badger Gulch Natural Area Preserve (Washington)	N, 15

The proposed facility is not located within any of the Protected Areas as defined by OAR 345-022-0040.

L.3 POTENTIAL IMPACTS

OAR 345-021-0010(1)(L)(B) *A description of significant potential impacts of the proposed facility, if any, on the Protected Areas including, but not limited to, potential impacts such as:*

Response: Through an evaluation of potential impacts, it has been determined that the design, construction, and operation of the facility are not likely to result in significant adverse impact to Protected Areas. The evaluation is described below.

- (i) *Noise resulting from facility construction or operation;*



Response: As detailed in Exhibit X, projected noise levels resulting from facility construction and operation would meet requirements contained in Oregon Department of Environmental Quality rules. For four noise receptors that may require a legally effective easement or real covenant that benefits the property on which the wind energy facility is located, as described in Exhibit X, none of these noise receptors are in the vicinity of the identified Protected Areas.

Given projected noise levels and distance between turbine locations and Protected Areas, noise resulting from facility construction or operation would not impact Protected Areas.

(ii) *Increased traffic resulting from facility construction or operation;*

Response: A detailed description of traffic resulting from facility construction and operation is included in Exhibit U.

The construction access route includes using US 97 from Biggs Junction at I-84 to the US 97/OR 206 intersection near Wasco. Construction traffic may also approach the site from the south on US 97. Construction traffic would use OR 206 to reach Wasco, and then use a series of local Sherman County roads to reach construction sites within the site boundary. Several local roads would need to be improved to accommodate heavier construction equipment, resulting in a long-term improvement to the local road system.

Temporary impacts such as short-term traffic delays on US 97 and local roads may affect access to Protected Areas associated with the John Day River (John Day Wildlife Refuge, John Day Federal Wild and Scenic River (WSR), and John Day State Scenic Waterway). However, the construction route is not a primary access route to these resources, and several passing lanes on US 97 would alleviate potential impacts. Traffic demands on local roads are currently low. Any effects are expected to be temporary, negligible, and would not have detrimental impact on Protected Areas. Long-term negative impacts due to traffic would be negligible because the facility would employ 15 to 20 people.

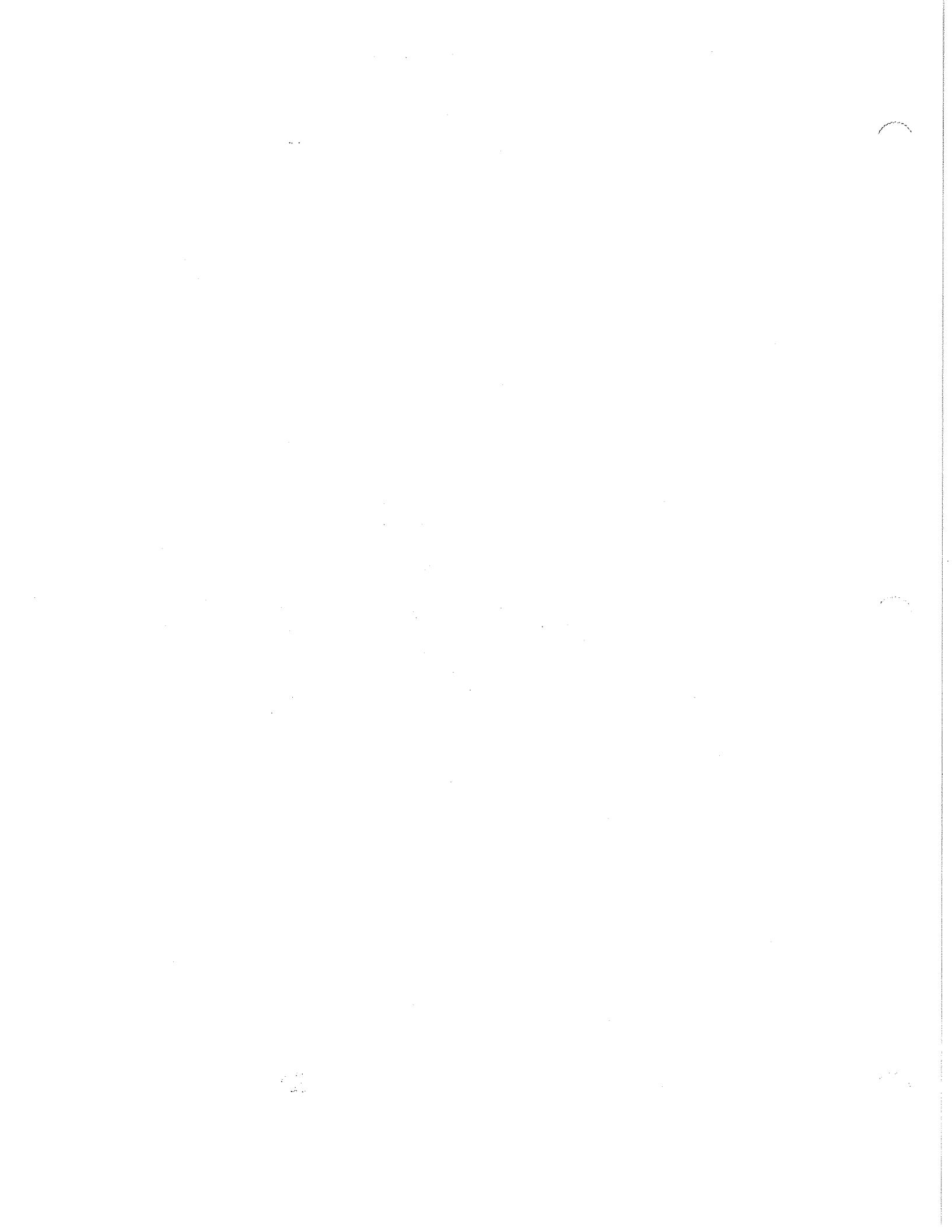
The remaining Protected Areas are distant enough from the facility that they would not be affected by increased traffic.

Local road improvements would enhance portions of a secondary access route to the John Day River via McDonald Ferry Lane, and thus have some positive impact on ability to access Protected Areas associated with the river.

In conclusion, increased traffic resulting from facility construction or operation would not adversely impact Protected Areas.

(iii) *Water use during facility construction or operation;*

Response: As stated in Exhibit O, water use during facility construction and operation will be minimal. During operations the water source will be a well near



the proposed Klondike III O&M facility. Water will be used during construction for concrete mixing, road compaction, and dust suppression. Water will be used during facility operation for drinking, toilet flushing, and sink operation. During construction, water will be trucked in from offsite.

Water use during facility construction or operation would not impact Protected Areas.

(iv) *Wastewater disposal resulting from facility construction or operation;*

Response: The use of water for construction practices is not anticipated to generate runoff. Wastewater would not be discharged into wetlands or other adjacent resources, as stated in Exhibit V. Sanitary effluent would be treated via the existing on-site septic system and stormwater would infiltrate on site.

Wastewater resulting from facility construction or operation would not impact Protected Areas.

(v) *Visual impacts of facility structures, including cooling tower or other plumes, if any; and*

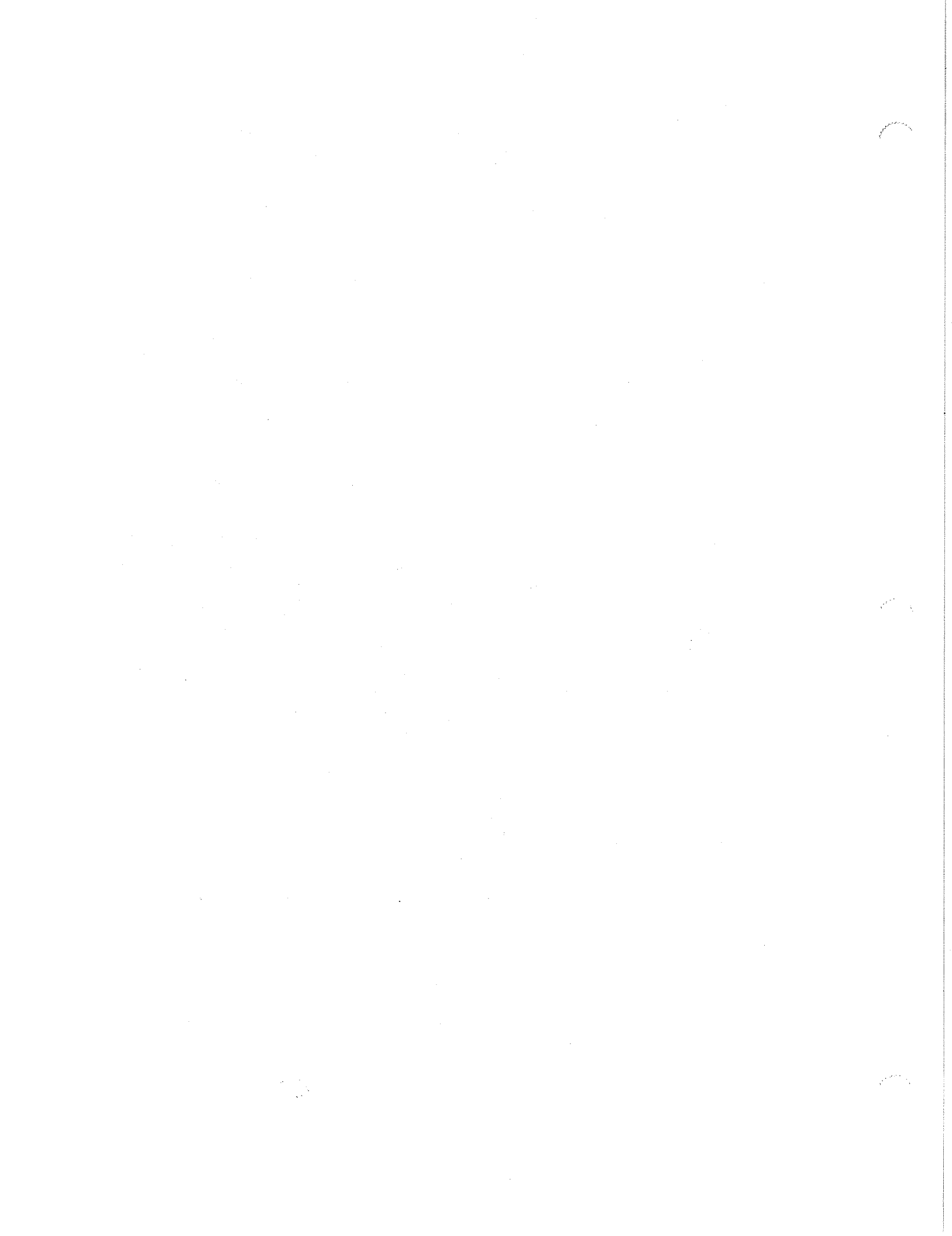
Response: Revised Exhibit R (September 16, 2005) includes a detailed discussion of potential impacts to significant or important scenic and aesthetic values identified in applicable federal land management plans and local land use plans as well as a detailed description of the computer modeling methods, visibility analyses, and results used to determine potential impacts. Several Protected Areas are not discussed in Revised Exhibit R because they are not identified in applicable federal land management plans and local land use plans. For this reason, the results of the visibility analyses for Oregon and Washington have been included as Figures L-3 and L-4, respectively, to illustrate the potential visibility of the proposed facility from Protected Areas.

For the purposes of discussing potential visual impacts, multiple Protected Areas that share similar boundaries have been summarized under a single heading. For example, the John Day River Corridor includes the John Day Wildlife Refuge, John Day Federal Wild and Scenic River, John Day State Scenic Waterway, and JS Burres State Recreation Site/BLM Cottonwood Facility.

Columbia River Gorge National Scenic Area (Oregon and Washington)

Revised Exhibit R includes a detailed discussion of potential visual impacts to the Columbia River Gorge National Scenic Area (CRGNSA). This Revised Exhibit L includes only a summary of the discussion from Revised Exhibit R.

The visibility analyses for Oregon and Washington indicate some portion of the proposed facility would potentially be visible from the CRGNSA. Site visits by the principal investigator indicate the proposed facility would not be visible as indicated by the visibility analysis results, or would be visible at such great



distances (approximately 20 miles or greater) that impacts, if any, would be negligible (see Revised Exhibit R). Almost without exception, topography or vegetation would screen the proposed facility from view. Access to areas from which the turbines may be visible is typically very limited and further reduces the potential for impacts.

In conclusion, topography and vegetation would substantially screen the proposed facility from the majority of the CRGNSA. It is possible that the proposed facility would be visible in the distant background from some areas with limited to very limited access and opportunities for viewing. In these areas, the proposed facility would be subordinate to the landscape setting that typically includes significant anthropocentric development such as interstate and rail transportation corridors, transmission corridors, and urban and rural development in the foreground and middleground. The proposed facility would have negligible, if any, impacts on the CRGNSA.

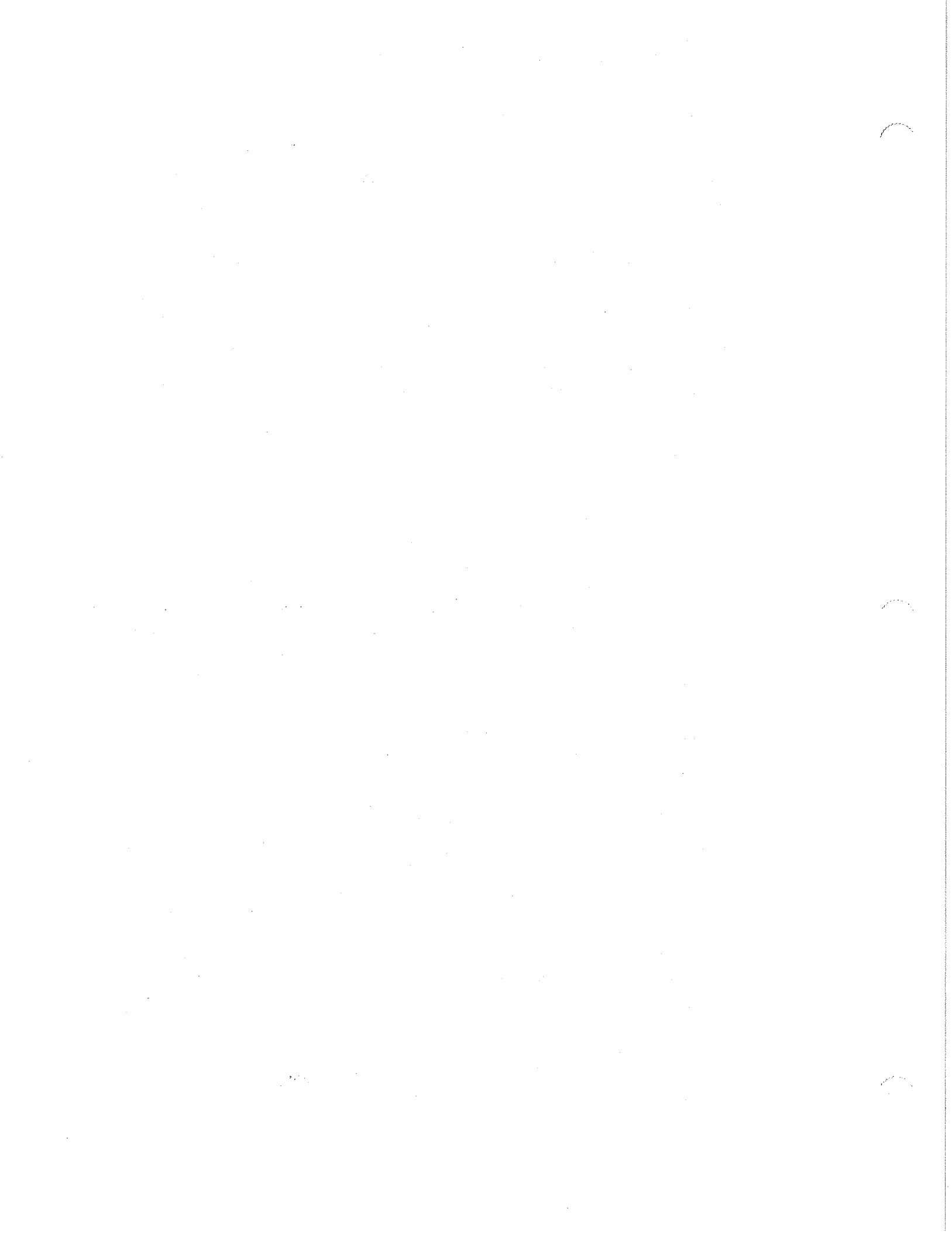
John Day River Canyon (Oregon)

The John Day River Canyon includes the John Day Wildlife Refuge, John Day Federal Wild and Scenic River, John Day State Scenic Waterway, and JS Burres State Recreation Site/BLM Cottonwood Facility. The proposed facility may potentially impact two Protected Areas: the John Day Federal WSR and John Day State Scenic Waterway, both of which are managed for outstanding scenic quality (USDI 1986, USDI 2000, USDI 2001). The John Day Wildlife Refuge is not managed for scenic quality (Kohl 2005). The proposed facility would not be visible from the JS Burres State Recreation Site, so there would be no impact to that Protected Area. Revised Exhibit R includes a detailed discussion of potential visual impacts to the John Day River Canyon. This Revised Exhibit L includes only a summary of the discussion from Revised Exhibit R.

The computer modeling and analyses indicate portions of the proposed facility would be visible from two river segments, the first near McDonald Crossing and the second between approximately river miles 15.9 and 16.8 (see Revised Exhibit R). Turbines would not be visible from the nearby BLM interpretive facility for the Historic Oregon Trail or its access road.

From the river near McDonald Crossing, the blade tips of turbines 122, 123 and 125 would be visible and the nacelle and blades of turbine 124 would be visible for approximately one and one-half minutes, assuming a floating speed of four miles per hour (mph). The turbines would appear small in scale in the background compared to other anthropocentric impacts in the canyon (e.g., irrigated pasture, farm and irrigation equipment, farm houses, trailers, fences, livestock, power lines) that are visible in the foreground and middleground from the river.

The proposed facility as seen from McDonald Crossing would have a weak contrast and would therefore be compatible with BLM's VRM Class II management objective: "management activities resulting in changes to the existing character of the landscape may be allowed, provided they do not attract the attention of the casual observer" (USDI 2000).



The second area of impact occurs between approximately river miles 15.9 and 16.8. The visibility analyses and simulations (see Revised Exhibit R) indicate that the blade tips of turbines 76, 95, 96, 97, 103, and 104 would be visible at different times for different durations through the approximately 0.9 mile segment. Most turbines would be visible for much less of the 0.9 mile segment. Turbine 103 would be the most visible for the longest duration. Assuming a floating speed of four mph, the viewer would move through this 0.9 mile segment in approximately 14 minutes. In many cases, the turbines' silhouettes will be barely discernible, if at all. Similar to the turbines' effects at McDonald Ferry, the turbines in this segment would appear small in scale compared to other anthropocentric development in the canyon and to the scale of the canyon in general and would be compatible with BLM's VRM Class II management objective.

The John Day River system includes over 500 river miles. Approximately 1.0 river miles, or 0.2 percent of the entire system, would be affected by the proposed facility. Impacts resulting from the proposed facility are relatively weak and would occur in the lower 40 river miles that are interspersed with significant private lands. Nearly all developed and undeveloped recreation sites within the river corridor occur upstream of river mile 40 and are screened from the proposed facility by topography and vegetation. Given the significantly small portion of river that would be affected and the weak nature of the potential impacts, the design, construction, operation, and retirement of the proposed facility would not result in significant visual impacts to the John Day River Canyon, including the John Day Wildlife Refuge, John Day Federal Wild and Scenic River, and John Day State Scenic Waterway.

Deschutes River Canyon (Oregon)

The Deschutes River Canyon includes the Deschutes Federal Wild and Scenic River, Deschutes State Scenic Waterway, Lower Deschutes Wildlife Area, Deschutes River State Recreation Area, and Heritage Landing.

Computer modeling results (see Revised Exhibit R), field investigations, and interviews with agency staff have indicated that the proposed facility would not be visible from the Lower Deschutes River Canyon (Anderson 2005, Fitzwater 2005, Houck 2005, Mottl, T. 2005). Therefore, there would be no visual impact to this resource.

Columbia Basin Agriculture Research Center, Moro (Oregon)

The research center is not managed for visual quality. Visual impacts, if any, would not significantly affect the research center (Petrie 2005).

Horn Butte Area of Critical Environmental Concern (Oregon)

The Horn Butte ACEC is not managed for visual quality (USDI 2001). Visual impacts, if any, would not significantly affect the ACEC (Mottl, H. 2005).

Goldendale Observatory State Park (Washington)



The proposed facility would not be visible from Goldendale Observatory State Park. Therefore, there would be no visual impact to this Protected Area.

Maryhill State Park (Washington)

The proposed facility would not be visible from Maryhill State Park. Therefore, there would be no visual impact to this Protected Area.

Badger Gulch Natural Area Preserve (Washington)

The proposed facility would not be visible from Badger Gulch Natural Area Preserve. Therefore, there would be no visual impact to this Protected Area.

- (vi) *Visual impacts from air emissions resulting from facility construction or operation, including, but not limited to, impacts on Class 1 visual resources as described in OAR 340-204-0050;*

Response: The proposed project would not create air emissions, so no impacts would occur.

L.4 CONCLUSION

The proposed project complies with all applicable regulatory guidelines concerning Protected Areas as previously discussed in OAR 345-021-0010(l)(L)(A) and (B). The design, construction, and operation of the proposed facility are not likely to result in significant adverse impact to Protected Areas, and the Council may find that the standard in OAR 345-022-0040 is satisfied.

L.5 REFERENCES

L.5.1 Telephone Contacts/Personal Interviews

Anderson, Jim. Park Ranger. Deschutes River State Recreation Area, Oregon Department of Parks and Recreation. Personal interview with Sean Sullivan. February 16, 2005.

Fitzwater, Daryl. Park Manager. Deschutes Management Unit, Oregon Department of Parks and Recreation. Telephone conversation with Sean Sullivan. February 14, 2005.

Houck, Jan. Scenic Waterway Coordinator. Oregon Department of Parks and Recreation. Telephone conversation with Sean Sullivan. March 7, 2005.

Kohl, Keith. District Wildlife Biologist. Mid-Columbia District. Oregon Department of Fish and Wildlife. Telephone conversation with Sean Sullivan. March 7, 2005.

Mottl, Heidi. Recreation Planner. Prineville District, Bureau of Land Management. Telephone conversation with Sean Sullivan. March 3, 2005.



Mottl, Tom. District Recreation Planner. Prineville District, Bureau of Land Management. Telephone conversation with Sean Sullivan. February 18, 2005.

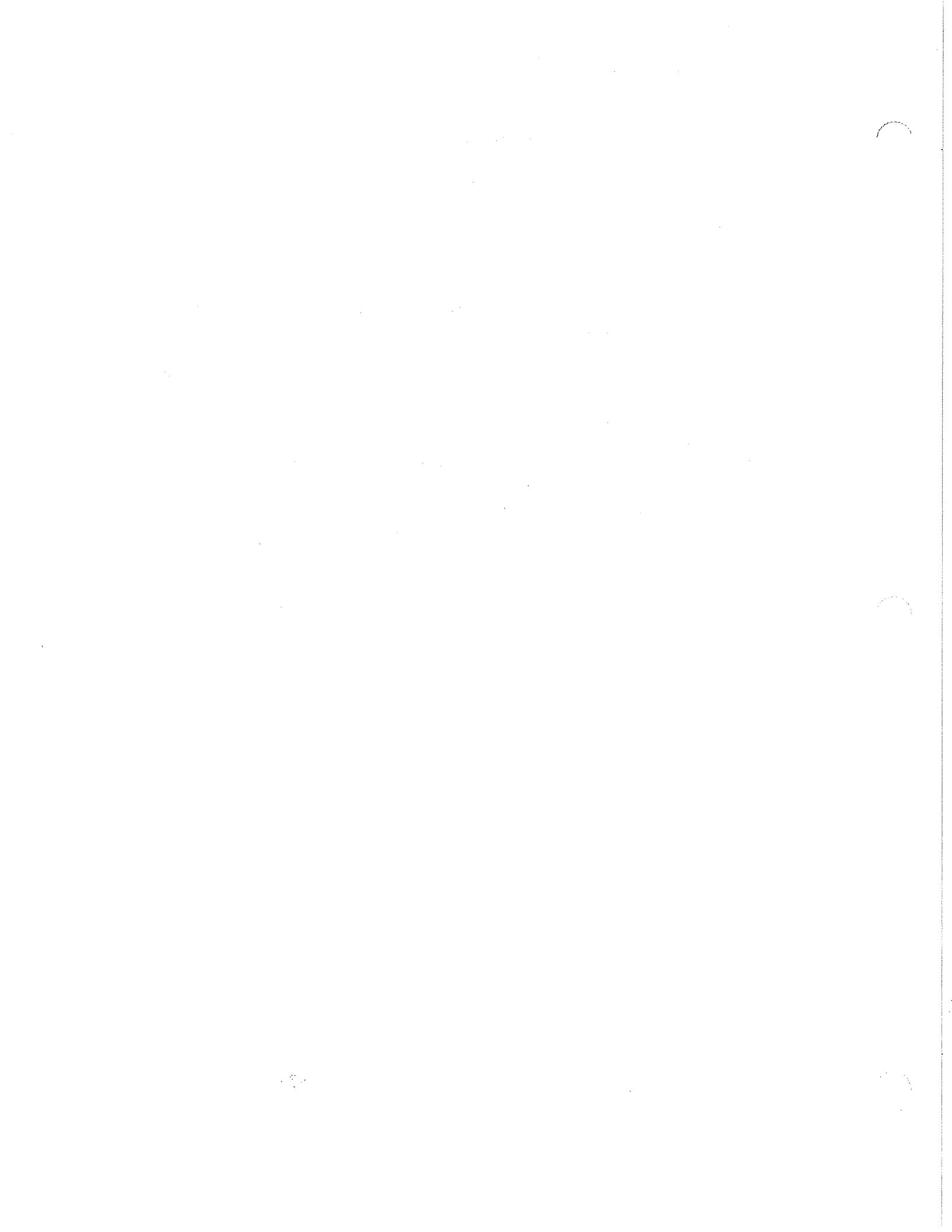
Petrie, PhD., Steve. Director. Columbia Basin Agriculture Research Center (Moro). Oregon State University. Telephone conversation with Sean Sullivan. March 10, 2005.

L.5.2 Website/Document References

USDI Bureau of Land Management. Two Rivers Resource Management Plan Record of Decision. June 1986.

USDI Bureau of Land Management. John Day River Proposed Management Plan, Two Rivers and John Day Resource Management Plan Amendments and Final Environmental Impact Statement. June 2000.

USDI Bureau of Land Management. John Day River Management Plan, Two Rivers, John Day, and Baker Resource Management Plan Amendments Record of Decision. February 2001.



APPENDIX L-1

Figures

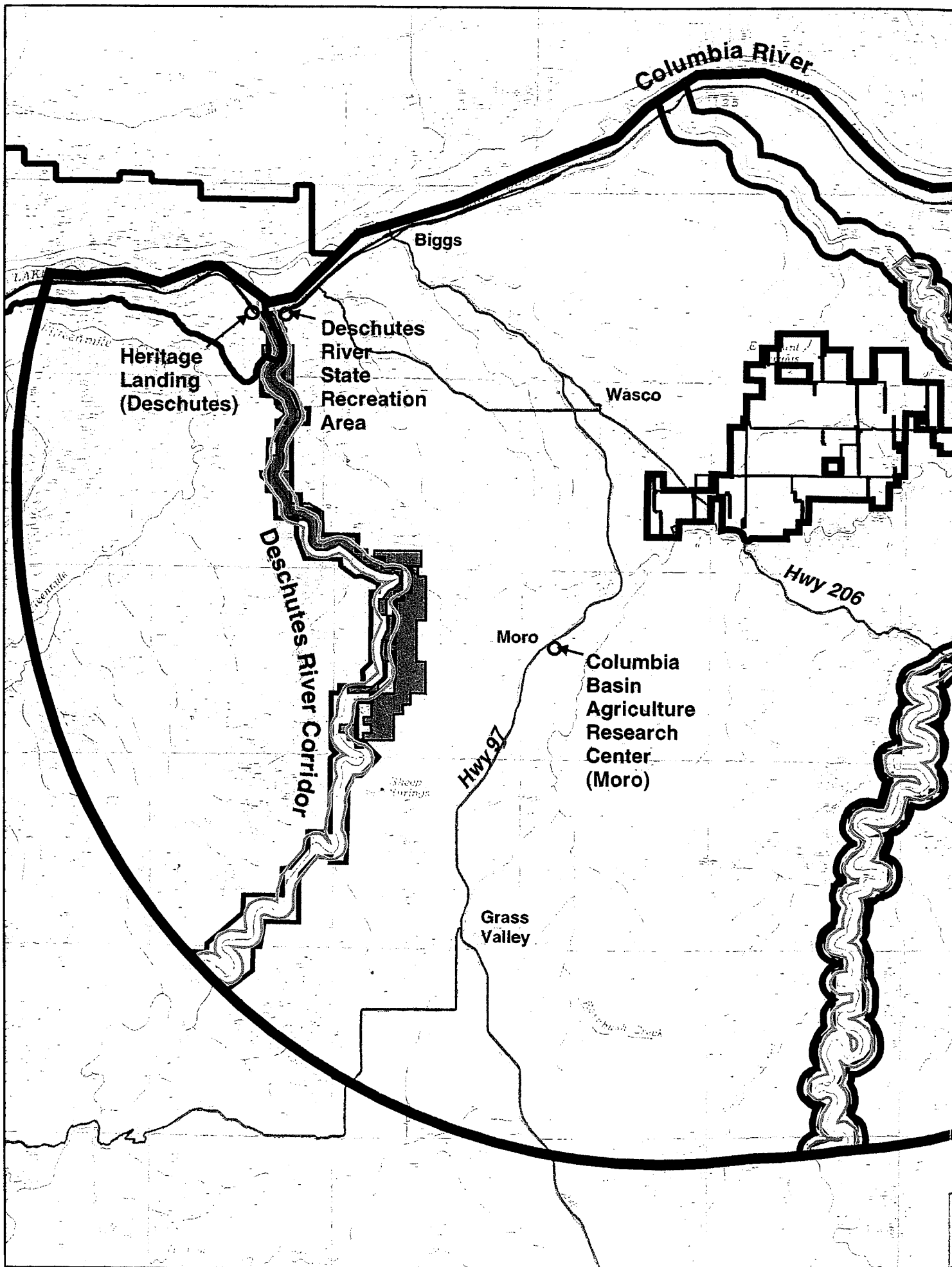
Figure L-1: Protected Areas, Oregon

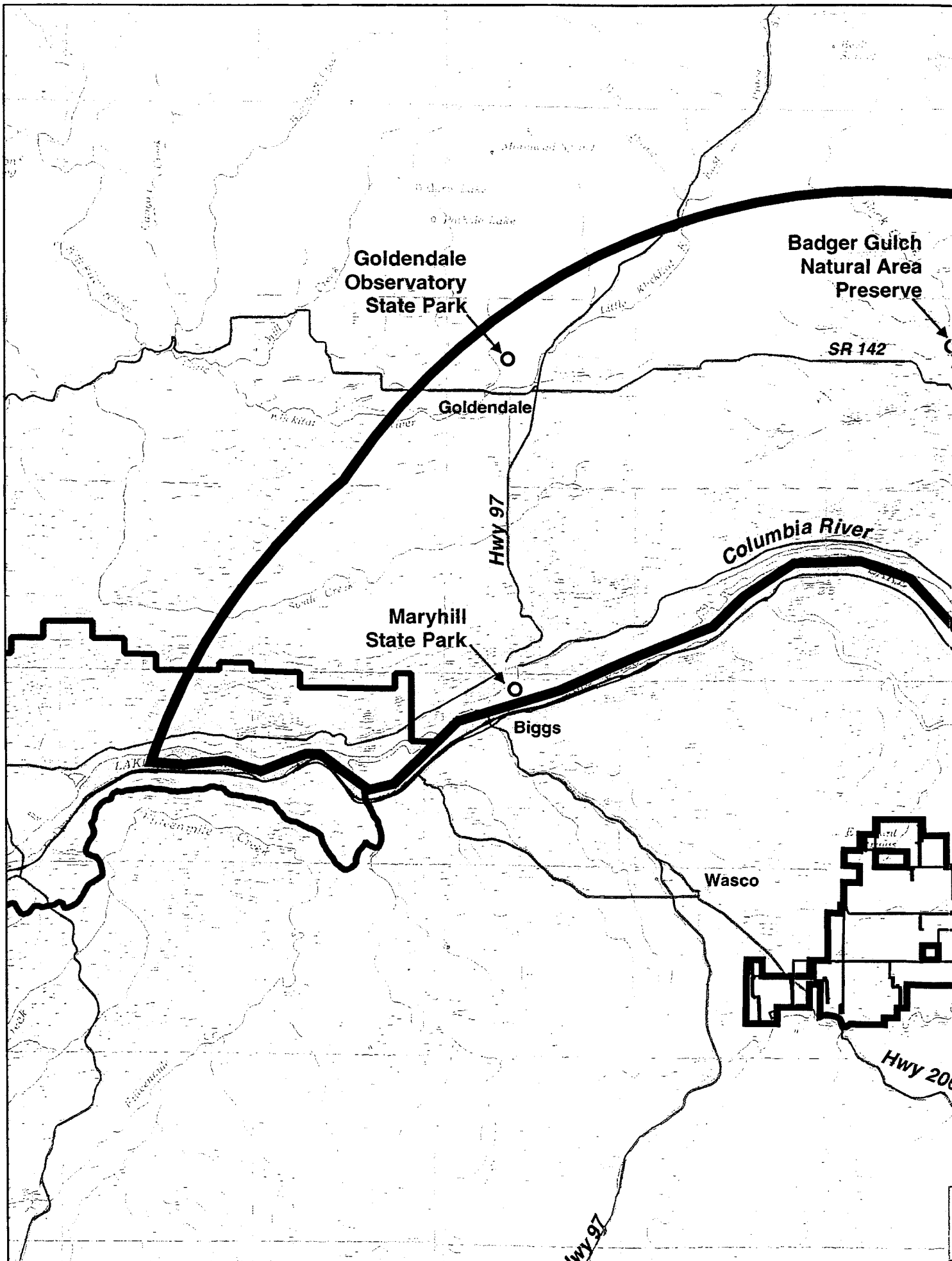
Figure L-2: Protected Areas, Washington

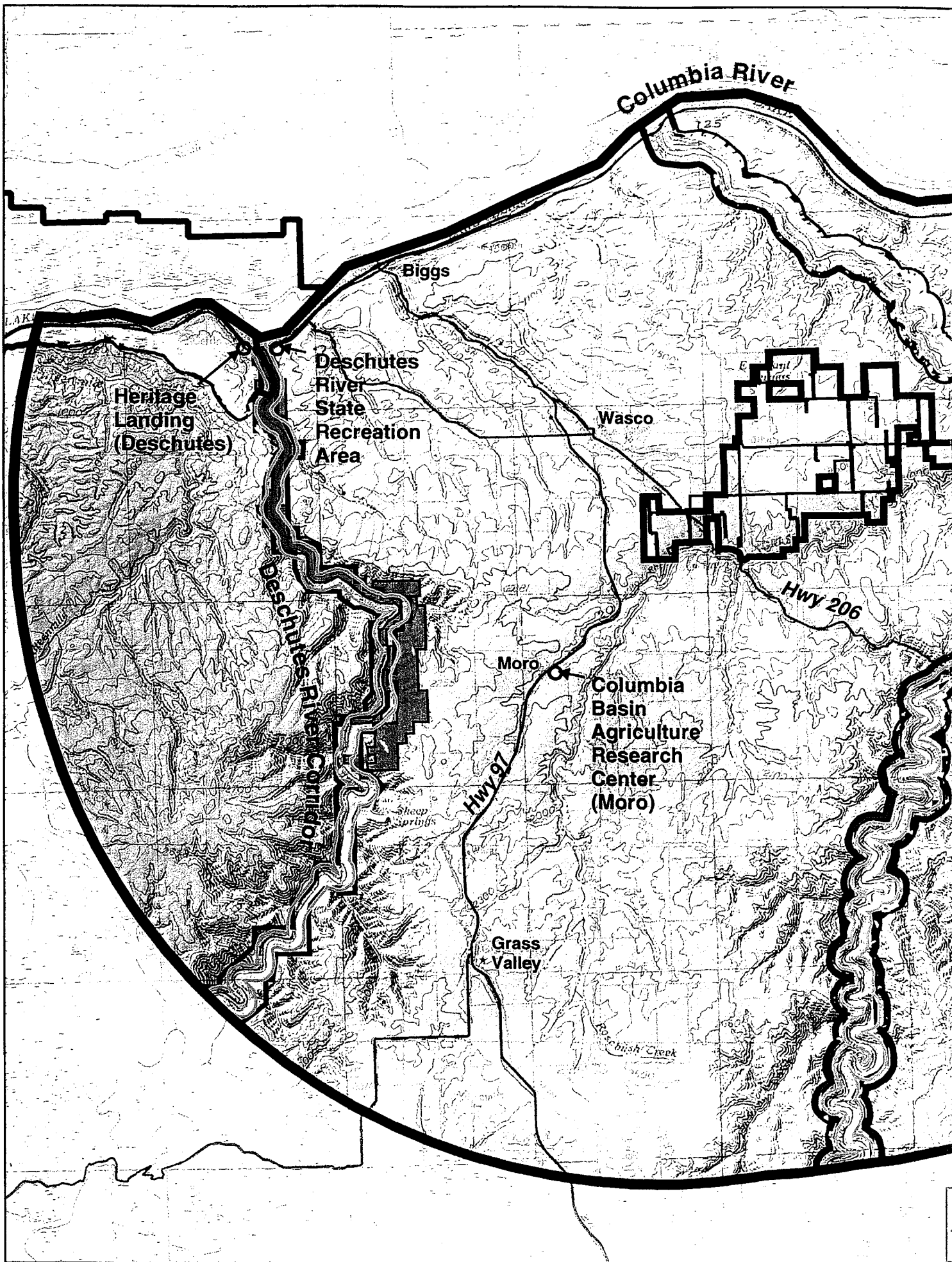
Figure L-3: Visibility Analysis, Oregon

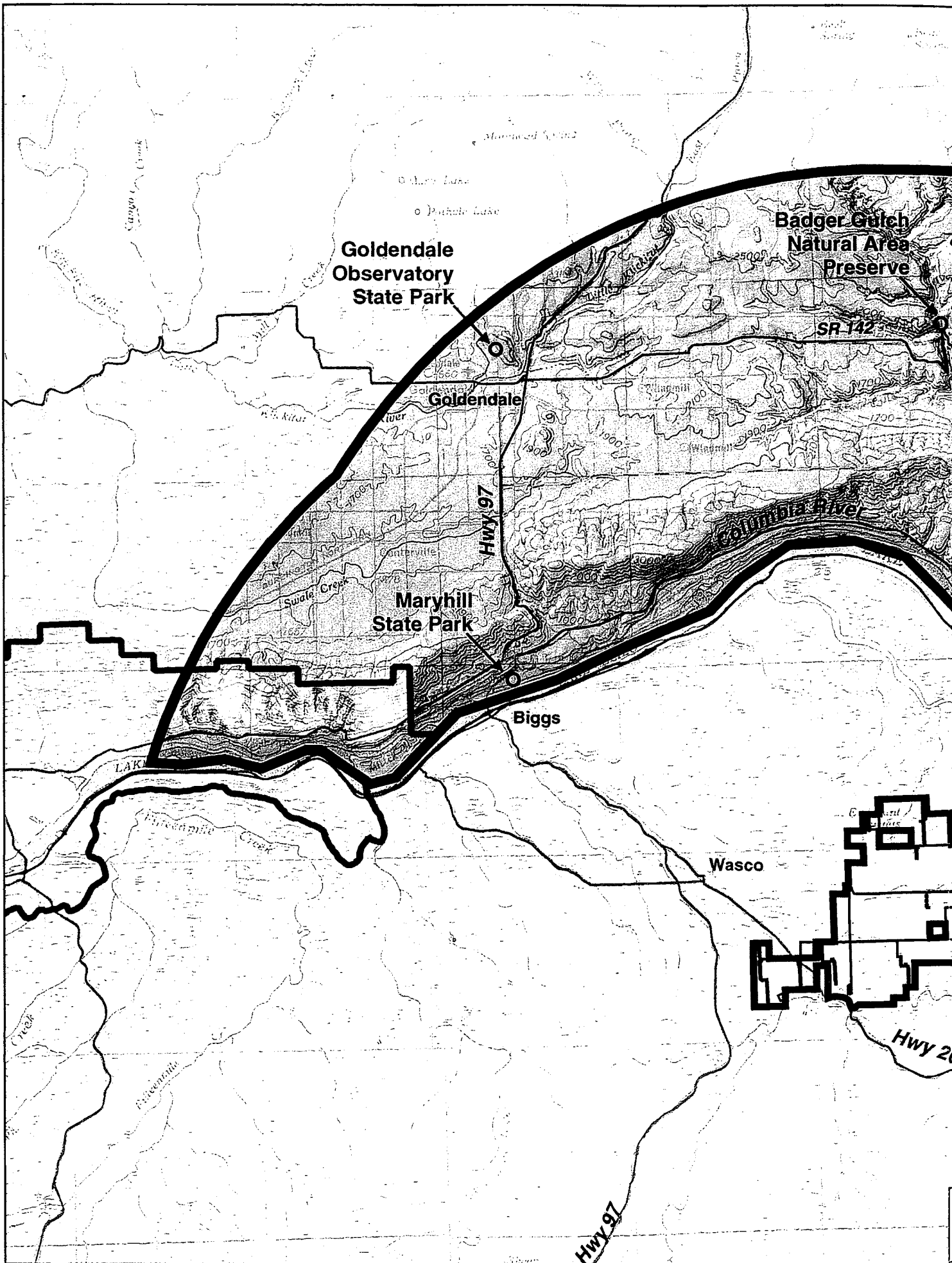
Figure L-4: Visibility Analysis, Washington













Please Reply To:

Toan-Hao B. Nguyen, Legal Counsel
Direct Dial (503) 813-5144
Fax (503) 813-7252
email: toan.nguyen@ppmenergy.com

August 9, 2005

Oregon Department of Energy
625 Marion Street, N.E.
Salem, Oregon 97310

Re: Application of Klondike Wind Power III LLC for Site Certificate

Dear Ladies and Gentlemen

I am an in-house attorney for Klondike Wind Power III LLC, an Oregon limited liability company (the "Applicant"), and have also acted as counsel to the Applicant.

In that connection, I have examined originals or copies certified or otherwise identified to my satisfaction of the books and records of Applicant and such other documents, limited liability company records, certificates of public officials and other instruments regarding the Applicant as I have deemed necessary and appropriate for the purposes of this opinion.

In rendering this opinion expressed below, I have assumed (i) the authenticity of all documents submitted to me as originals and (ii) the conformity to original documents of all documents submitted to me as copies. As to factual matters, I have relied to the extent deemed proper, upon statements and certifications of officers and manager of the Applicant.

Based upon the foregoing, to the best of my knowledge, I am of the opinion that, subject to the Applicant's meeting all applicable federal, state and local laws (including all rules and regulations promulgated thereunder), the Applicant has the legal authority to construct and operate the up to 273 MW name-plated capacity wind generation facility and associated facilities located in Sherman County, Oregon (the "Project") that the Applicant proposes in its Application for Site Certificate to the filed with the Oregon Energy Facility Siting Council and in connection with which this opinion is rendered, without violating articles of organization covenants or similar agreements.

I am a member of the bars of the states of California, Oregon and Washington and do not hold myself out as an expert in, and do not express any opinion with respect to, the law of any jurisdiction other than the law of the states of California, Oregon and Washington.

The foregoing opinion is limited solely to whether the Applicant has the authority under its operating agreement to construct, own and operate the Project. I express no opinion as to the applicability of any federal, state or local laws (including all rules and regulations promulgated thereunder) to such construction and operation or as to the effects of the foregoing laws on such construction and operation.

Please contact me if you have any additional questions regarding this matter.

Very truly yours,

PPM ENERGY, INC.



Toan-Hao B. Nguyen
Legal Counsel

Golden Northwest Aluminum

3113 West Second Street
The Dalles, Oregon 97058

Phone (541) 298-0801

Fax (541) 298-0800

October 14, 2005

Attn: Jesse Gronner
1125 NW Couch
Suite 700
Portland, OR. 97209

Dear Ms. Gronner

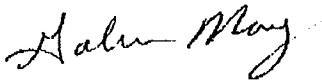
This letter is to confirm our discussions that Golden Northwest Aluminum Holding Company, located in The Dalles, Oregon, can supply PPM with up to 18,000,000 gallons of water over the January through December 2007 time period.

Golden Northwest Aluminum Holding Company holds the rights to groundwater wells as noted by following Water Certificates; Permit #48480, #44001, #G-338 Well #1A, #G-647 Well #3A, and #G-648 Well #4A.

We look forward to working with PPM in bringing about the Phase III Klondike wind farm.

If you have any questions feel free to call me at 541-298-0859.

Sincerely yours,



Galen May
Environmental Mgr
Golden Northwest Aluminum Holding Co.