



Oregon

Kate Brown, Governor



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To: Oregon Energy Facility Siting Council
From: Chase McVeigh-Walker, Siting Analyst
Date: May 14, 2019
Subject: Staff Report Supplement for Agenda Items E & K (Montague Wind Power Facility): Comments received on DPO as of May 13, 2019 for May 16-17, 2019 Council Meeting
Attachments: Attachment 1: Comments Received on the DPO as of May 13, 2019

On May 2, 2019, the Oregon Department of Energy (Department) provided the Oregon Energy Facility Siting Council (Council or EFSC) with a Staff Report for both Agenda Items E and K for the upcoming May 16/17 EFSC meeting. Attachment 3 of the May 2, 2019 staff report included all comments received on the DPO, as of May 2. This staff report, acting as a supplement to the May 2 staff report, presents all comments received by May 13, 2019.

All comments received on the DPO by the date of issuance of this staff report supplement are indicated in the Comment Index below and are included in their entirety as Attachment 1. Any additional written comments received during the comment period will be transmitted to Council either electronically, or hand-delivered at the May 16-17 Council meeting.

Comment Index			
Date Received	Last Name	First Name	Entity
Previously Provided in the May 2 Staff Report and Included in Attachment 1			
4/9/2019	Cherry	Steve	Oregon Department of Fish and Wildlife (ODFW)
5/2/2019	Buck	Craig	Public
5/2/2019	Fitzner	Elaine	Public
Newly Submitted and Included in Attachment 1			
5/13/2019	Wales	Barbara	Public
5/13/2019	Wisdom	Michael	Public
5/13/2019	Wisdom	Elias	Public

Attachment 1: Comments Received on the Draft Proposed Order as of May 13, 2019

MCVEIGH-WALKER Chase * ODOE

From: Steve Cherry <Steve.P.Cherry@state.or.us>
Sent: Friday, April 12, 2019 11:46 AM
To: MCVEIGH-WALKER Chase * ODOE
Cc: REIF Sarah J
Subject: RE: Montague Wind Power Facility: Notice of Complete Request for Amendment 4 of the Site Certificate, Draft Proposed Order – May 16, 2019 Comment Deadline
Attachments: ODFW Memo Montague_RFA4_ DPO.pdf

Chase,

Please find attached ODFW's comments on the RFA4 and DPO. Please let me know if you have any questions or need anything else from ODFW. Thanks

Steve

From: MCVEIGH-WALKER Chase * ODOE <Chase.McVeigh-Walker@oregon.gov>
Sent: Tuesday, April 9, 2019 4:17 PM
Subject: Montague Wind Power Facility: Notice of Complete Request for Amendment 4 of the Site Certificate, Draft Proposed Order – May 16, 2019 Comment Deadline

Good afternoon,

On January 15, 2019, the Oregon Energy Facility Siting Council (Council) and the Oregon Department of Energy (Department) received a complete Request for Amendment 4 of the Montague Wind Power Facility (RFA4). The Montague Wind Power Facility is an approved wind energy facility located in Gilliam County (referred to as "Phase 1") – See locational map in the attached noticed. On April 5, 2019, the Department issued its Draft Proposed Order presenting recommended findings of fact related to Council standards at OAR Chapter 345 Divisions 22-24.

Summary of the Amendment Request

RFA4 seeks Council approval for authorization to add an additional 13,339 acres to the site boundary, seeks approval for the construction and operation of new facility components (referred to as "Phase 2") including a solar photovoltaic array and battery storage, as well as turbine modifications (increasing maximum blade tip height from 486 feet to 597.1 feet), and flexibility to install any combination of wind and solar energy facility components as long as the total maximum output of Phase 2 would not exceed 202 megawatts (MW).

Attachments

Public Notice on Request for Comments on the Complete RFA4 and Draft Proposed Order is attached for your reference.

RFA4, draft proposed order and public notice are available on the Department's project website at:
<https://www.oregon.gov/energy/facilities-safety/facilities/Pages/MWP.aspx>

Comment Deadline

Written comments on RFA4 and the draft proposed order must be received by the Department **by the close of the May 16, 2019 public hearing**, and must be submitted in writing by mail, email, hand-delivery or fax per below:

Chase McVeigh-Walker, Siting Analyst
Oregon Department of Energy
550 Capitol Street NE, 1st Floor
Salem, OR 97301

Email: Montague.AMD4@Oregon.gov

Fax: 503-373-7806

Written or oral comments may be provided at the public hearing. The Council will not accept comments on RFA4 or the Draft Proposed Order after the close of the record of the Draft Proposed Order public hearing.

Thank you, and please do not hesitate to contact me with any questions.

Sincerely,

Chase McVeigh-Walker



Chase McVeigh-Walker Siting Analyst

Oregon Department of Energy

550 Capitol Street N.E., 1st Floor

Salem, OR 97301

P: 503-934-1582

C: 971-600-5323

Oregon.gov/energy



Leading Oregon to a safe, clean, and sustainable energy future.

MEMORANDUM

TO: Chase McVeigh- Walker
Oregon Department of Energy

FROM: Steve Cherry, District Wildlife Biologist
Oregon Department of Fish and Wildlife
PO Box 363 Heppner, OR 97836
(541) 676-5230
Steve.p.cherry@state.or.us

DATE: April 12, 2019

RE: Oregon Department of Fish and Wildlife (ODFW) Comments on the Request for
Amendment 4 and the Draft Proposed Order for the Montague Wind Power
Facility

GENERAL COMMENTS: ODFW appreciates the Applicant working to address all of the previous comments on this proposed Amendment. ODFW is currently working with the Applicant and ODOE on the finalization of the Revegetation, Wildlife Habitat Mitigation, and Wildlife Monitoring and Mitigation Plans. ODFW does not have any further comments on the RFA4 or the Draft Proposed Order.

2301 N CREEK DRIVE
MT PLEASANT, SC 29466

CHARLESTON SC 294

02 MAY 2019 PM 31



CHASE McVEIGH
OREGON DEPARTMENT OF ENERGY
551 CAPITOL STREET NE, 1ST FLOOR
SALEM, OR 97301

97301-252951



Craig Buck
2301 North Creek Drive
Mount Pleasant, SC 29466

RECEIVED
MAY 06 2019

May 1, 2019

DEPARTMENT OF ENERGY

Mr. Chase McVeigh
Oregon Department of Energy
551 Capitol Street NE, 1st Floor
Salem, Oregon 97301

Dear Mr. McVeigh:

I am writing this as a comment regarding the proposed Montague 2 Wind Power Project in Gilliam County, Oregon. In years past I have spent time hunting, hiking and spending time enjoying the scenic and historic Gilliam County Oregon gems that are situated along Upper and Middle Rock Creek Roads that parallel Rock Creek. I have concerns for potential wind turbine visual and noise impacts.

I am addressing the "Scenic Aesthetic Values", Historic Resources and "Noise" OARs and Gilliam County standards for the same. I studied the Exhibits R, S & X and associated OARs: 345-022-0080 scenic resources and 345-022-0090 historic resources and related OARs and Gilliam County Land Use Plans. I understand that the application is an amendment to an approved project. I am not opposed to the Montague 2 and prefer all solar instead of wind turbines.

Upon leaving the Arlington area and driving through farming area and wind turbines, it's a relief to drop down into the Rock Creek canyon into the classic John Day environment of cliffs, flowing water, grassy hillsides, farming and wildlife. Of particular interest to me is the Olex area where the historic pioneer Olex cemetery is situated. I have reviewed parts of the project amendment documents online and have not found anything about the development's potential indirect impacts to the canyon and cemetery. Just text about Fourmile Canyon, etc., and other places that are miles and miles away from the turbines but no discussion on beautiful local canyons with proposed turbines within a mile or less that are likely to be visible from the public Rock Creek Rd. I understand there is an analysis area up to 10 miles but how could more local valuable places be forgotten in all the process regulations? People travelling this part of the county and the Rock Creek road enjoy the landscape and the much-needed escape from the flat extensive wheatfields with turbines, whether they are visiting tourists or locals.

Assuming all the OARs are addressed but the County has not specifically requested that the Department of Energy provide for special analysis to be given to their scenic and historic resources close to the site, I am requesting that the decision-makers pause and require further analysis and consultation with the local residents and anyone else such as impacted property owners that live elsewhere. In addition, I disagree with "Rock Creek" waterbodies being considered of no importance for recreational value and thus was not addressed further. Rock Creek and the surrounding landscape is a recreational type opportunity, surrounded by all private land (thus limited to the public) and is

important to those wanting to get away from the public. Hunting leases bring \$ to landowners which spend their money locally and in Oregon.

It is the primarily the historic cemetery that deserves attention when addressing impacts. *The cemetery and historic setting around it should be given the same recognition and analysis as the "built environments properties" in the site. Just because it doesn't have a special designation with a national database or other official recognition does not mean it's to be ignored.* The County is obligated to address historic resources and potential significant or important impacts even if they are indirect (visual, lights and operating noise) in the site. In addition, common sense should apply if no specific rule addresses things sufficiently.

There is approximately 116+ years of history represented in the canyon and at the cemetery. Enjoying this is a recreational experience. The history is all documented at the museum in Condon but the living museum is along and just off the country roads. All I can find in the amendment about scenic areas and history is the possible visual impacts to residents of Olex, no recognition about the important historic cemetery. The County only has three buildings on the National Register of Historical Places but it has 125 historical sites identified—all of those deserve special attention when addressing direct or indirect adverse impacts, whether "significant" adverse impact or not.

It's a true wonder and that the setting is still mostly the same today and is a unique resource and contribution to the history this region is known for. The days of the Oregon Trail and the pioneer people that settled here after their long hard cross-country journey as far back as the 1800's come to mind as they meander through the cemetery and nearby. What a peaceful setting where one can get away from the reminders of modern society (as seen elsewhere to the north in the county). This part of live history alongside farming and ranching activities should not be impacted and should be respected forever.

The amazing thing about the setting of the cemetery is that the landscape and surrounding view shed has not changed much since the late 1800's. We all need quiet places with beautiful landscapes to reflect on the past, nourish our souls and for meditating as we say thanks to those who came before us.

The other thing this area is known for is its remoteness and dark skies. When hiking on properties in the Rock Creek area some of the owners would take me out to "the back 40" and say "Do you hear that?". Of course I would say "No, I don't hear anything." In fact I could only hear me – my soft breathing as I took it all in. A place with no intrusive human activity noise! How rare! The night sky is always so fantastic, no light pollution except to the north. *This kind of place is rare to find in today's world. This should be considered a real treasure to Oregon and the county and the whole country and should not have busy industrial in-your-face fast-spinning turbines in its setting.* The International Dark Sky Association now has recently started an Oregon Chapter because Oregon has such a special resource for astronomers and others.

We do not have dark skies where I live, Oregonians are so lucky. Once it is gone, it is gone forever. Increase in development and turbines with two lights each is a permanent significant impact. You cannot offset for that permanent loss or the lost current and future opportunity to experience silence, darkness and open historic vistas. Two lights on every turbine (assuming the big ones), would add too much distraction. I will note that the historic value of the cemetery especially the historic setting itself will be degraded by the sight of turning turbines and their red or other blinking lights. When going up the short two track road as you approach the cemetery, according to the application (scenario A, maybe B too) there will likely be spinning turbine blades, standing towers and blinking red lights right in your face as you approach the cemetery gate. A nearby visual simulation taken at the old elementary school with the historic school sign in the photo indicates what is likely to be seen (scenario A) also from the nearby cemetery. What a shame to allow this intrusion of a historical setting that still retains the same characteristics as the mid to late 1800's. 1866 is the earliest known burial at the cemetery! It all looks like a western movie setting to me and deserves attention and setbacks.

The historical area that has miraculously been preserved in the Rock Creek area should have complete respect and also receive protection from direct visual degradation. *Set the turbines back further, put elsewhere in the site or just use solar.* The permit should specify this condition. Gilliam County has hundreds of thousands of acres of land on which to place turbines and avoid valuable public resources, whether formally designated or not. Put turbines in farm fields that are away from special areas. Again, once you erase history from the countryside you will never get it back. We should all be proud that the ones that came before us and the present-day folks had the vision to preserve, enhance and protect these resources.

To me, the potentially indirect effects of the project to these historical sites has not been adequately addressed in the application especially in regard to local plans which I have reviewed online. In particular, Gilliam County natural resources (inclusive of history) plans. While I truly appreciate the exhaustive 1,330+ pages of information prepared by the developer and the 362 pages Draft Proposed Order pages prepared by the and Dept. of Energy (I have not time to study much of either in detail), an outstanding item is resolving sufficient setbacks that will enable continuation of a living history site with farming and ranching and residences where people are maintaining historic buildings. This should be addressed in condition 48 or another applicable condition.

My travel buddies and I are not against wind turbine development if it is permitted appropriate to the location. Montague 2 turbines should be set back from historic areas so as not to be seen or heard from Rock Creek. I support solar energy. I can easily spend my tourist \$ elsewhere, in some other state, and I am not alone when I say that. The beauty of Gilliam County will become more and more valuable over time, increasing tourism and providing a source of living history instead of just a museum (that's about all we have back east). Please don't make our mistakes, we should have saved more special sites from indirect impacts as we grew rapidly.

One of the stone grave markers reads: "Gone but not Forgotten". We have the duty, the obligation and responsibility to respect those who came before us and retain the quiet and peaceful pioneer setting in which they rest in peace and so we can pray and meditate in peace.

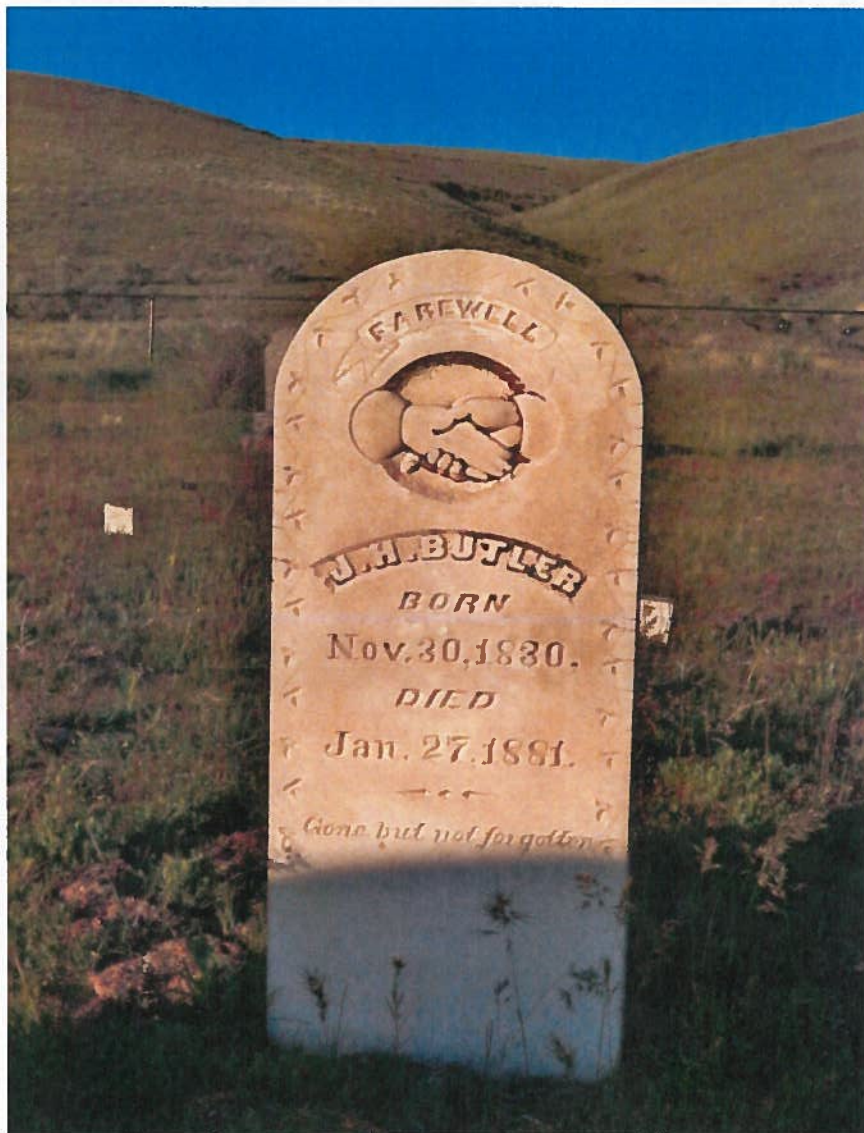
Thank you for the opportunity to comment.



Craig Buck

cc: Gilliam County Planning Department

Oregon State Historical Preservation Office



Elaine Fitzner

19947 W. CDA LK SWR
CDA, ID 83814

PHOENIX AZ 852

04 MAY 2019 PM 1



Chase McVeigh

C/O Oregon Dept. of Energy
551 Capitol St. NE 1st Floor
Salem, OR

97301-252951



Elaine Fitzner
19947 West Coeur d'Alene LK SHR
Coeur d'Alene, Idaho 83814

April 28, 2019

Chase McVeigh
Oregon Department of Energy
551 Capitol Street NE 1st Floor
Salem, Oregon 97301

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MAY 06 2019

DEPARTMENT OF ENERGY

Dear Mr. McVeigh:

I am writing to address my concerns over the Montague 2 Wind Project located in Gilliam County, Oregon. A few of the turbines will adversely affect the historical significance of the town of Olex and permanently alter the view shed from the Rock Creek corridor as well as the Olex pioneer cemetery located less than a half mile from the site boundary. It is my understanding that potential impacts to historic sites were analyzed in the amendment 4 application exhibit S but I can't find anything on these subjects nor do I have time to read all the amendment text. I did see the Oregon National Historic Trail addressed in one of the exhibits but not the pioneer cemetery.

As a long-term resident of the Pacific Northwest, I often traverse back roads looking for landscapes that support historic communities and the natural world/wildlife. My interest in the settlement of the Pacific Northwest has led me to many several small communities in Eastern Oregon. One suggested driving tour (Gilliam County Historical Society) traverses Rock Creek and the former town of Olex. The nationally important pioneer cemetery that occurs in Olex is on the list of historic cemeteries in Oregon (see Oregon.gov parks and recreation, Oregon Heritage, Oregon Commission on historic cemeteries). There are headstones dating to the mid 1800's. Many of the graves are from residents of eastern states who headed west near the end of the vast migration across the U.S. on the Oregon Trail. Residents of the surrounding area and people from across the country visit the cemetery to enjoy the solitude, pray, and decorate the graves of their ancestors. The old school house, Crum Mill, beautifully maintained historic residences, all in a traditional farming/ranching setting with native grasslands on slopes still occur at and near the Olex Townsite. Local historians say that people who went to school at the schoolhouse still visit the area today and reunions are held. The same peaceful valley can be seen in photos taken in the late 1800's. The presence of turbines, lights, and associated human activities, on the ridgeline above Rock Creek will permanently alter the historic ambience of this small community, deter visitors and directly impact those who use the outdoor church—the cemetery. It is my understanding that these type of energy developments follow required setbacks to homes and that churches, schools and libraries are considered noise sensitive properties. A cemetery should also be a noise sensitive property. It is time that Oregonians ask for equal protection to cemeteries, whether pioneer or more recent. Even though the valley,

corridor and historic buildings and cemetery will be directly avoided, there could still be impacts (visual and noise). The ultimate goal is that no turbines be visible in the historic area or viewable from the cemetery and a peaceful experience is still possible.

Nature enthusiasts and those wanting to escape an industrialized or commercialized world—even people from other countries—seek out places like Gilliam County to spend time enjoying the open space and habitats. Recreational users often spend time in nearby towns benefiting the economy. Turbines, perhaps almost 600 feet tall, lining the ridgeline above Rock Creek, will negatively impact many people who prefer an open vista with historic and turn-of-the century features and characteristics. In addition, they will take their tourist dollars to another county.

I support renewable energy and I am grateful to those who take on such challenges, but some adjustments are needed. There are solutions. Energy can still be generated while insuring protection of the serenity of Rock Creek—place wind turbines further away from the Rock Creek Corridor. Another option (scenario C) is to utilize a more benign energy development – the proposed solar array. It will be less detrimental to wildlife species, than the turbines, and ensure a less constricted view shed throughout historic Olex.

With our crazy lives, often fraught with stress, it is wonderful to escape to places like Rock Creek in Gilliam County. I encourage Avangrid Renewables to preserve the historical ambience and at the same time greatly reduce direct impacts to birds and bats but still generate the same amount of renewable energy.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elaine Fitzner".

Elaine Fitzner

Cc: Gilliam County Planning Dept. and Gilliam County Court

Cc: State Historic Preservation Office

10 May 2019

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MAY 13 2019

To: Chase McVeigh-Walker, Siting Analyst
Oregon Department of Energy
and the
Energy Facility Siting Council Members
551 Capitol Street NE 1st Floor
Salem, Oregon 97301

DEPARTMENT OF ENERGY

From: Barbara Wales
64340 Mount Emily Road
La Grande, OR 9850

Dear Mr. McVeigh,

This is a letter of public record that I hereby submit to you and the Oregon Department of Energy on the proposed Montague 2 Wind Power Project in Gilliam County. I know the area well and have been exploring eastern Oregon backcountry for decades. I have reviewed the legal documents on this proposed project, and the request #4 for an amendment and I have serious legal, social, economic, and aesthetic concerns about some portions of the wind turbine proposed layouts. I am specifically concerned about the historic resources, scenic aesthetic values, and noise regulations (OARs) that are not being adequately addressed with the proposed wind turbines that will be placed directly above the Upper and Middle Rock Creek drainage.

Turbines will be placed in plain and prominent view, directly above the drainage, completely eliminating the historic and unique view shed encompassing the historic Olex town site, the original elementary schoolhouse, and historic pioneer Olex cemetery and all surrounding properties. All landowners and users of this drainage and surrounding areas could be permanently affected by the prominent, striking placement of these turbines. This part of the proposal appears to be incomplete or in direct conflict with OAR 345-022-0080 regarding analyzing and addressing impacts to and protection scenic resources, and OAR 345-022-0090 regarding analyzing and addressing impacts to and protection of historic resources and as also found in related Gilliam County Land Use Plans. I am also concerned about chronic background noise that will permanently alter the quality of life in this area and the continued risk to birds and bats that get killed by the in the Columbia Basin area every year. For example, using data from ten plus years ago, an estimated 15,276 birds (98 species) birds are likely being killed every year (see RFA-4 Exhibit P). Although the Council previously reviewed that information and the expanded area has been studied and avoidance/minimization measures proposed, it is time that us Oregonians get smart and use an alternative to the traditional source of our alternative energy. I support solar which will greatly reduce visual and noise issues and bird and bat kills.

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As far as I can tell this part of the proposed amended wind turbine project has undergone little public review or input but is already at a "Hearing" stage with no more comments accepted after May 16.

YORER
As a citizen of Oregon and traditional user of the Olex town site and surrounding landscapes, I can tell you that having wind turbines as an alien array of extremely tall objects, in direct attack of the view shed from all points of view from the adjacent Upper and Middle Rock Creek drainage, as well as from surrounding ridgetops, is among the most negative and repulsive aesthetic and social effects that is possible for rural Gilliam County. This dramatic reduction in the quality of the view shed includes the continuously blinking, red lights throughout the dark hours of each day and in the dark foggy days of winter. Currently the view shed has some of the most dramatic nighttime skies of anywhere in the continental U.S. Oregon has started a chapter of the International Dark Skies Association and will be proposing communities consider designating the area as Dark Sky Reserves. People travel the world to experience these and spend a considerable amount of money locally. Lighting minimization is being proposed for the amendment facilities but scattered blinking lights are extremely distracting to enjoyment of the evening experience.

Have these many negative effects been adequately documented and shared with the public for their input? From my examination of the documents of public record, they clearly have not. Have the local landowners near the Olex town site been asked, via formal social and economic surveys, for their input on the current amendment and proposed scenarios? To the best of my knowledge, thus far they have not. This places the Department of Energy and the Gilliam County responsible officials/departments in legal jeopardy.

The Olex area is one of those special areas that remains free of this intrusive landscape change that will permanently alter the lives, lifestyles, and quality of life experiences in this area. Before this project is approved, I urge the Oregon Department of Energy and Gilliam County Land Planning to conduct social and economic surveys of landowners and all users of the Upper and Middle Rock Creek drainage and Olex Town site area. Surveys should formally collect data on the preferences

Failing that (and I believe that your agency and Gilliam County will proceed with this proposal, without the benefit of social and economic surveys), I recommend that there be a condition that requires pulling back or putting somewhere else all proposed wind turbines from the ridgetop that would currently have any portion of turbines in view from the Upper Rock Creek road and drainage, and in view from the Olex unincorporated community and historic Town site and in view from all properties along this portion of the Rock Creek drainage. This plateau/dryland farming area would be more appropriate for solar power development. This is one of the last remaining areas in Gilliam County that is free of wind turbines as a prominent landscape eyesore, and this part of Gilliam County remains a special place of historic, aesthetic, social, and economic values that will be substantially and permanently diminished with placement of turbines within view

from the bottom of this drainage. Something does NOT need to have a significant adverse impact in order for us a smart humans to put our thinking caps on and avoid and minimize to the greatest extent possible.

I am a supporter of alternative energy but its time we all pause and ask ourselves what our vision is for the near future and the future generations who will by then have an ever grater disconnect with the history of Oregon. Preserve some areas for recreation, meditation, hunting, exploring, etc. in a landscape free from the modern industrialized world.

Thank you for considering my comments and recommendation to maintain the integrity of this area. I look forward to the modification of this proposal to pullback turbines from the ridgetop above Upper and Middle Rock Creek to a distance from which they cannot be viewed from the drainage and important features below.

Sincerely,

A handwritten signature in blue ink that reads "Barbara C. Wales". The signature is written in a cursive, flowing style.

Barbara Wales

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MAY 18 2019

9 May 2019

DEPARTMENT OF ENERGY

Chase McVeigh-Walker
Oregon Department of Energy and the Oregon Energy Facility Siting Council Members
551 Capitol Street NE 1st Floor
Salem, Oregon 97301
Montague.AMD4@Oregon.gov

Dear Mr. McVeigh-Walker,

This letter is in regard to the Montague 2 Wind Power Project in Gilliam County. I am specifically responding to the request for public comments on the complete request for Amendment 4, with a public comment period that ends on May 16, 2019. Please consider my letter as part of public input on this proposed amendment.

I am intimately familiar with the area in which this solar and wind turbine project is proposed. I routinely spend time, year-round, in the Olex area along Upper and Middle Rock Creek, near the historic cemetery and historic school site. I can tell you that it is a special place to both the property owners in this area and the many visitors to Gilliam County.

The portion of the proposal that would build out wind turbines in direct view from the Upper and Middle Rock Creek drainage, Olex Townsite, and surrounding properties, has me gravely concerned (Amendment 4). This part of the wind turbine proposal will profoundly alter the landscape, eliminating its incredibly special qualities. There are few areas in Gilliam County that remain out of view of wind turbines. Olex Townsite is one of them, and it is a special place that is enjoyed by visitors across the U.S., whether recreating, visiting family, seeing the cemetery and/or remembering their relatives buried there, birdwatching, watching farming activities, seeing historic features like old basalt fences, etc. It also is a special place for local landowners, and most of them have not been directly contacted to gain their input on the proposal to build turbines along the ridgeline directly in view from their properties. Olex townsite includes the state historic cemetery, which dates back to times of initial European settlement of Gilliam County, and which is visited by many who seek a better understanding of our past or pray and meditate. The prospect of this townsite and cemetery being under the imposing array of turbines above them is not a compatible land use and is disrespectful not only to the people today but also to those in the future as well as those whose hard work during the pioneer days gave us what we so treasure today. Care needs to be taken to identify areas like the Olex townsite, cemetery, and associated Upper and Middle Rock Creek drainage, that remain intact as they exist today, and that are protected through appropriate land use planning to be maintained and enjoyed for their inherent, existing conditions and values.

I strongly recommend that wind turbines not be constructed in areas where any portion of a turbine can be viewed from the Upper and Middle Rock Creek drainage or associated

properties near Olex townsite. I further recommend that solar panels be used in place of wind turbines in any areas where there would be visual impact from the wind turbines; this solution would still provide sufficient megawatts of additional clean energy production, but without the highly negative aesthetic, social, and economic effects on landowners and visitors to the beautiful area surrounding Olex townsite. It would also almost eliminate bird and bat kills which is quickly becoming unsustainable, even if there are no population impacts documented so far. Why wait for it to occur, prevention is the best approach.

I have been reviewing technical papers on raptor telemetry for possible upcoming publication. I noted some of the birds (one adult red-tailed hawk and one adult golden eagle, local breeding birds) that were studied 2011-2015 were in the general Gilliam County area, specifically along Rock Creek south of the proposed boundary expansion. The information was provided to the Oregon Dept. of Fish and Wildlife and the Washington Dept. of Fish and Wildlife in 2017. It indicates use along the Rock Creek and side-canyons as well as along Baseline Rd. and nearby farm fields. By setting back from known use areas, and areas that have just minimal use, we can all rest assured we are minimizing potential risk to our native birds.

Finally, whether its required or not, I recommend that formal social and economic surveys of landowners along the Upper and Middle Rock Creek drainage be taken to document their attitudes and willingness to accept the presence of wind turbines within view of their properties, whether it's a home or just land, and to better understand the economic effects of wind turbine developments on adjacent landowners. None of this would be necessary if the solar arrays are used instead of turbines.

Thank you for considering my recommendations to minimize or alleviate the highly negative effects of the proposed turbines that will be placed within the view shed of Upper and Middle Rock Creek in and near the Olex town site. I look forward to learning about how the proposed project will be modified in response to my recommendations and similar recommendations by other stakeholders and landowners.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Wisdom". The signature is fluid and cursive, with the first name "Michael" and last name "Wisdom" clearly distinguishable.

Michael Wisdom
64340 Mount Emily Road
La Grande, OR 97850

MCVEIGH-WALKER Chase * ODOE

From: Wisdom, Eli <wisd2742@pacificu.edu>
Sent: Monday, May 13, 2019 8:41 PM
To: Montague AMD4 * ODOE
Subject: Letter for Public Comment Regarding RFA4
Attachments: E_Wisdom_Olex_Wind_Power_Letter.pdf

Please see the attached PDF.

Thank you.

May 13, 2019

To: Chase McVeigh-Walker
Oregon Department of Energy
551 Capitol Street NE 1st Floor
Salem, Oregon 97301

From: Elias Wisdom
64340 Mount Emily Road
La Grande, OR 9850
ewisdom@pacificu.edu

Dear Mr. McVeigh:

I am writing to address my concerns over the Montague 2 Wind Project located in Gilliam County, Oregon. I am specifically responding to the request for public comments on the complete request for Amendment 4, with a public comment period that ends on May 16, 2019. Please consider my letter as part of official public input on this proposed amendment.

As an Oregonian and lifetime resident, I consider it paramount that the historic and beautiful landscapes that make Oregon treasured and rich with wildlife, be preserved and maintained whenever possible. The recent proposition which would build wind turbines in direct view from the Upper and Middle Rock Creek drainage, Olex Townsite, and many of the surrounding properties, will have a dramatic and negative impact on the unique attributes that contribute to the exclusivity of this landscape. Modifications to this proposal that will reduce these impacts do exist and need to be considered before the current proposal is solidified.

The area in which wind turbines will potentially constructed is in direct site of a nationally historic cemetery located in Olex. The gravesite is one of Oregon's oldest, and contains the remains from some of the first to make their way West on the Oregon Trail. This cemetery is often visited by relatives and tourists for mourning, meditation, and appreciation of the contribution and storied past that these headstones represent. Having large wind turbines in direct site of this cemetery is not only visually unappealing, it is disrespectful to the individuals whose remains are buried and the many who visit in remembrance.

Beyond the dramatic impact on the historic nature of this area, the wind turbine expansion plan will have significant ecological impacts. Wind turbines can have substantial impacts on many bird and bat species, many of which are native to Oregon. The winged animals that are treasured in our state are routinely killed by large wind turbines, and it is widely accepted among research scientists that wind turbines do, and will continue, to damage the many bird and bat populations within Oregon. Not only do the turbines physically harm birds and bats, but the anthropogenic noise created by these turbines has dramatic impact on their (and many other four-legged animal's) ability to communicate amongst each other. In doing so, these turbines will cause severe impacts to an animal's ability to breed, avoid predators, and hunt for food, all of which have deleterious population impacts. The negative impacts on the richness and diversity of fauna in this area will be felt at all levels of the food chain and also contribute to the loss of recreational activities that make this area a popular destination for outdoorsmen.

Many of the historic, quiet, and beautiful landscapes that make Oregon exceptional are quickly being lost to increasing development. The proposition that this letter refers to needs to be carefully examined from every angle, as well as thoroughly communicated and discussed with current residents, which, from my understanding, has not occurred. From my own research and discussions with professionals, it is my understanding that the installment of solar panels in place of wind turbines can generate sufficient power. This modification to the proposition will dramatically reduce the environmental impact on this area, and retain the many aesthetic and breathtaking views that make this area one-of-a-kind. I strongly urge the discussion of solar panels in place of wind turbines, and for every possible attempt to be made to reduce the adverse effects on this area of Gillam County.

I am highly in favor of generating renewable energy, although I believe that these endeavors can take place alongside preservation of the historic and ecological attributes of the environment. Alterations to the Montague 2 Wind Project expansion should be seriously considered.

Thank you for considering my comments and recommendations. I look forward to hearing about the modifications and alterations to this expansion plan that will take wind turbines out of view from Upper and Middle Creek road, and the drainage below.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elias Wisdom', with a stylized, flowing script.

Elias Wisdom