ESTERSON Sarah * ODOE

From: wendomere@everyactioncustom.com on behalf of Wendy Holzman <wendomere@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 12:54 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Wendy Holzman
2659 NW Brickyard St Bend, OR 97703-7020 wendomere@gmail.com

ESTERSON Sarah * ODOE

From: snobunnie1992@everyactioncustom.com on behalf of Kelly Dunn <snobunnie1992@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 12:54 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Dr. Kelly Dunn
750 Rosecrans Ave Manhattan Beach, CA 90266-3451 snobunnie1992@yahoo.com

ESTERSON Sarah * ODOE

From: unurban1@everyactioncustom.com on behalf of John Andersen <unurban1@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 12:55 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr John Andersen
PO Box 725 Elmira, OR 97437-0725
unurban1@gmail.com

ESTERSON Sarah * ODOE

From: dianne.douglas@everyactioncustom.com on behalf of Dianne Douglas <dianne.douglas@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 12:59 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Dianne Douglas
2723 E Valencia Dr Phoenix, AZ 85042-7082 dianne.douglas@asu.edu

ESTERSON Sarah * ODOE

From: bahloo7@everyactioncustom.com on behalf of Cindy Cannon <bahloo7@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:01 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Cindy Cannon
48560 Mckenzie Hwy Vida, OR 97488-9737
bahloo7@yahoo.com

ESTERSON Sarah * ODOE

From: lechenimmy@everyactioncustom.com on behalf of Michelle West <lechenimmy@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:01 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs Michelle West
1277 Rockinghorse Ln Lake Oswego, OR 97034-1657 lechenimmy@yahoo.com

ESTERSON Sarah * ODOE

From: todd87701@everyactioncustom.com on behalf of A.Todd <todd87701@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:02 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. A. Todd
225 River Ave # 41783 Eugene, OR 97404-2508 todd87701@gmail.com

ESTERSON Sarah * ODOE

From: deborah.a.lipman@everyactioncustom.com on behalf of Deborah Lipman <deborah.a.lipman@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:02 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mrs. Deborah Lipman
50 Stimson Ave Providence, RI 02906-3218 deborah.a.lipman@gmail.com

ESTERSON Sarah * ODOE

From: mark.betti@everyactioncustom.com on behalf of Mark Betti <mark.betti@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:03 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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Sincerely,
Mr. Mark Betti
3490 Coy Dr Sherman Oaks, CA 91423-4530 mark.betti@gmail.com

ESTERSON Sarah * ODOE

From: bonkuppler@everyactioncustom.com on behalf of Bonnie kuppler <bonkuppler@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:04 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Bonnie kuppler
96605 W Harris Heights Rd Brookings, OR 97415-9719 bonkuppler@gmail.com

ESTERSON Sarah * ODOE

From: miraclepieco@everyactioncustom.com on behalf of Rodger Hoyt <miraclepieco@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:04 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. Rodger Hoyt
PO Box 318 Glendale, OR 97442-0318
miraclepieco@gmail.com

ESTERSON Sarah * ODOE

From: glkuppler@everyactioncustom.com on behalf of George Kuppler <glkuppler@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:06 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. George Kuppler
96605 W Harris Heights Rd Brookings, OR 97415-9719 glkuppler@gmail.com

ESTERSON Sarah * ODOE

From: hillarytiefer@everyactioncustom.com on behalf of Hillary Tiefer <hillarytiefer@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:06 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Dr. Hillary Tiefer
5007 SW Canterbury Ln Portland, OR 97219-3369 hillarytiefer@hotmail.com

ESTERSON Sarah * ODOE

From: mpjcrane@everyactioncustom.com on behalf of Mark Crane <mpjcrane@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:06 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. Mark Crane
2101 N Highland Ave Ste D Los Angeles, CA 90068-2661 mpjcrane@yahoo.com

ESTERSON Sarah * ODOE

From: valerie78955@everyactioncustom.com on behalf of Valerie Thomert <valerie78955@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:06 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Valerie Thomert
Impasse Des Praviots Hawthorn, PA 16230 valerie78955@hotmail.fr

ESTERSON Sarah * ODOE

From: mantyfan@everyactioncustom.com on behalf of Pamela Kjono <mantyfan@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:06 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
ms Pamela Kjono
9200 Mulholland Dr Grand Forks, ND 58201-3102 mantyfan@yahoo.com

ESTERSON Sarah * ODOE

From: chrismsokol@everyactioncustom.com on behalf of Chris Sokol <chrismsokol@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:08 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Chris Sokol
2750 NW SKYLINE Blvd Portland, OR 97229 chrismsokol@gmail.com

ESTERSON Sarah * ODOE

From: katy@everyactioncustom.com on behalf of Kate Ryan <katy@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:08 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Dr Kate Ryan
61666 Hosmer Lake Dr Bend, OR 97702-3671 katy@wildermail.com

ESTERSON Sarah * ODOE

From: bessythree@everyactioncustom.com on behalf of Ronald Ratner <bessythree@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:09 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Ronald Ratner
3916 N Potsdam Ave # 3769 Sioux Falls, SD 57104-7048 bessythree@yahoo.com

ESTERSON Sarah * ODOE

From: smarone@everyactioncustom.com on behalf of Susan Marone <smarone@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:10 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Susan Marone
7 Halford Dr Heath, TX 75032-7605
smarone@aol.com

ESTERSON Sarah * ODOE

From: jcbrownco@everyactioncustom.com on behalf of Margaret Brown <jcbrownco@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:11 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Margaret Brown
10306 Forest Trails Dr Foristell, MO 63348-2535 jcbrownco@centurylink.net

ESTERSON Sarah * ODOE

From: undrdog@everyactioncustom.com on behalf of Kim Koch <undrdog@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:11 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs Kim Koch
37680 Northfork Rd Nehalem, OR 97131-9685 undrdog@nehalemtel.net

ESTERSON Sarah * ODOE

From: oldanm@everyactioncustom.com on behalf of Rick Fencl <oldanm@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:13 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. Rick Fencl
PO Box 9711 Albuquerque, NM 87119-9711
oldanm@yahoo.com

ESTERSON Sarah * ODOE

From: xfullmoon83x@everyactioncustom.com on behalf of Jennifer Graff <xfullmoon83x@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:15 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Jennifer Graff
3001 N 32nd St Apt 220 Phoenix, AZ 85018-6834 xfullmoon83x@gmail.com

ESTERSON Sarah * ODOE

From: lileth_32817@everyactioncustom.com on behalf of Jennifer Dehart <lileth_32817@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:15 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Jennifer Dehart
11850 SE 26th Ave Milwaukie, OR 97222-7280 lileth_32817@yahoo.com

ESTERSON Sarah * ODOE

From: navigator902@everyactioncustom.com on behalf of Frank Cassianna <navigator902@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:17 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. Frank Cassianna
1636 Maple St Myrtle Point, OR 97458-1523 navigator902@gmail.com

ESTERSON Sarah * ODOE

From: redhawksky@everyactioncustom.com on behalf of Sky Yeager <redhawksky@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:17 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
ms Sky Yeager
4400 NW Walnut Blvd Corvallis, OR 97330-3259 redhawksky@copper.net

ESTERSON Sarah * ODOE

From: startyourlife44@everyactioncustom.com on behalf of Laurie Tabor <startyourlife44@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:18 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Laurie Tabor
1042 Hamilton Ave Longwood, FL 32750-3614 startyourlife44@gmail.com

ESTERSON Sarah * ODOE

From: dan.howe@everyactioncustom.com on behalf of Dan Howe <dan.howe@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:18 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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Sincerely,
Mr. Dan Howe
805 SE 74th Ave Portland, OR 97215-2232 dan.howe@comcast.net

ESTERSON Sarah * ODOE

From: Dianevanussel@everyactioncustom.com on behalf of Diane Van Ussel <Dianevanussel@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:23 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
mrs Diane Van Ussel
1790 Viewmont Dr Los Angeles, CA 90069-1321 Dianevanussel@gmail.com

ESTERSON Sarah * ODOE

From: ravynsdaughter@everyactioncustom.com on behalf of Mikki Chalker <ravynsdaughter@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:23 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Mikki Chalker
119 Prospect St Binghamton, NY 13905-2328 ravynsdaughter@aol.com

ESTERSON Sarah * ODOE

From: annikaborgetto@everyactioncustom.com on behalf of Annika Bruna <annikaborgetto@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:25 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Annika Bruna
8 Rue De Boulonville Dixon, CA 95620
annikaborgetto@yahoo.fr

ESTERSON Sarah * ODOE

From: pgkzo@everyactioncustom.com on behalf of Paul Kalka <pgkzo@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:26 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Paul Kalka
4397 Brady Hill Rd Binghamton, NY 13903-6336 pgkzo@yahoo.com

ESTERSON Sarah * ODOE

From: rcpaulson@everyactioncustom.com on behalf of Robert Paulson <rcpaulson@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:27 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

It is time for a new look at Amendment #4 on the Summit Ridge Wind Farm site certification.

Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Mr. Robert Paulson
19708 Newberry Way Oregon City, OR 97045-7277 rcpaulson@msn.com

ESTERSON Sarah * ODOE

From: oshee@everyactioncustom.com on behalf of Benjamin Mercer <oshee@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:28 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Benjamin Mercer
1024 16th St SE Roanoke, VA 24013-2009
oshee@gdess.net

ESTERSON Sarah * ODOE

From: dadahlgren@everyactioncustom.com on behalf of Deborah Dahlgren <dadahlgren@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:32 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Deborah Dahlgren
96 Silver Ln Apt C2 East Hartford, CT 06118-1007 dadahlgren@earthlink.com

ESTERSON Sarah * ODOE

From: rogerbrewer@everyactioncustom.com on behalf of Roger Brewer <rogerbrewer@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:34 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Dr. Roger Brewer
5739 SW Downs View Ct Portland, OR 97221-1201 rogerbrewer@comcast.net

ESTERSON Sarah * ODOE

From: peachcookiesme@everyactioncustom.com on behalf of Nancy Saphier <peachcookiesme@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:36 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Nancy Saphier
29 Beekman Pl Glen Rock, NJ 07452-3101
peachcookiesme@yahoo.com

ESTERSON Sarah * ODOE

From: ksvejtasa@everyactioncustom.com on behalf of Stanley Vejtasa <ksvejtasa@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:37 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Stanley Vejtasa
312 Roseburg, OR 97470
ksvejtasa@gmail.com

ESTERSON Sarah * ODOE

From: choss2live@everyactioncustom.com on behalf of John Selove <choss2live@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:39 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. John Selove
85 Prall Ln Eugene, OR 97405-3335
choss2live@yahoo.com

ESTERSON Sarah * ODOE

From: nalle54@everyactioncustom.com on behalf of Richard Eng <nalle54@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:40 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Richard Eng
3359 Roods Creek Rd Hancock, NY 13783-1847 nalle54@tds.net

ESTERSON Sarah * ODOE

From: sdooley3300@everyactioncustom.com on behalf of Sheila Dooley <sdooley3300@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:41 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Sheila Dooley
3300 Vensel Rd Mosier, OR 97040-9509
sdooley3300@yahoo.com

ESTERSON Sarah * ODOE

From: mmooshie@everyactioncustom.com on behalf of Marilyn Mooshie <mmooshie@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:42 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Marilyn Mooshie
970 Lake Shore Dr Selma, OR 97538-9528
mmooshie@frontier.com

ESTERSON Sarah * ODOE

From: debhoushour@everyactioncustom.com on behalf of Deborah Houshour <debhoushour@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:43 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Deborah Houshour
48818 Gaylord Rd Myrtle Point, OR 97458-8715 debhoushour@gmail.com

ESTERSON Sarah * ODOE

From: david_berg@everyactioncustom.com on behalf of David And Judith Berg <david_berg@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:45 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

The greatest good is served only by preserving and protecting natural systems on which all life depends, habitats that constitute them, and wildlife that inhabit them.

We are writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. David And Judith Berg
4125 Brae Burn Dr Eugene, OR 97405-2037 david_berg@comcast.net

ESTERSON Sarah * ODOE

From: kzskirvin@everyactioncustom.com on behalf of Katherine Skirvin <kzskirvin@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:46 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing as an outdoor enthusiast, a member of Blue Mountain Wildlife, and resident of northeastern Oregon to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Ms. Katherine Skirvin
3210 SW Hailey Pl Pendleton, OR 97801-3631 kzskirvin@gmail.com

ESTERSON Sarah * ODOE

From: pterygophora@everyactioncustom.com on behalf of June Mohler Mitman <pterygophora@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:46 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. June Mohler Mitman
540 Elkhorn Ln Butte, MT 59701-9660
pterygophora@earthlink.net

ESTERSON Sarah * ODOE

From: angie@everyactioncustom.com on behalf of Angelika Roll <angie@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:46 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Angelika Roll
2 Kyllmannst Berlin, NY 12203
angie@rosa-b.de

ESTERSON Sarah * ODOE

From: tartarpatterson@everyactioncustom.com on behalf of Charlotte Patterson <tartarpatterson@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:46 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Miss Charlotte Patterson
610 Thornhill Rd Boaz, AL 35956-3500
tartarpatterson@gmail.com

ESTERSON Sarah * ODOE

From: sdooley3300@everyactioncustom.com on behalf of Sheila Dooley <sdooley3300@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:47 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Sheila Dooley
3300 Vensel Rd Mosier, OR 97040-9509
sdooley3300@yahoo.com

ESTERSON Sarah * ODOE

From: watrous4@everyactioncustom.com on behalf of Ellen Watrous <watrous4@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:53 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Ellen Watrous
3334 NW Covey Run Rd Corvallis, OR 97330-3155 watrous4@comcast.net

ESTERSON Sarah * ODOE

From: dan@everyactioncustom.com on behalf of Dan Sherwood <dan@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:53 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Dan Sherwood
1719 SE 35th Ave Portland, OR 97214-5038 dan@dansherwood.com

ESTERSON Sarah * ODOE

From: jennworldwide@everyactioncustom.com on behalf of Jennifer Hauge <jennworldwide@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:54 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Jennifer Hauge
245 Sonora Way S Salem, OR 97302-4422
jennworldwide@hotmail.com

ESTERSON Sarah * ODOE

From: brownnab@everyactioncustom.com on behalf of Nancy Brown <brownnab@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:55 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Nancy Brown
2154 NE 78th Ave Portland, OR 97213-6610 brownnab@gmail.com

ESTERSON Sarah * ODOE

From: luvsea33@everyactioncustom.com on behalf of Diana Kekule <luvsea33@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:55 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Diana Kekule
255 NE Bensell Ave # 3 Depoe Bay, OR 97341-1920 luvsea33@gmail.com

ESTERSON Sarah * ODOE

From: robertburch51@everyactioncustom.com on behalf of Robert Burch <robertburch51@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 1:56 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Robert Burch
56965 Gladewood Rd Coquille, OR 97423-8509 robertburch51@gmail.com

ESTERSON Sarah * ODOE

From: dlsewall@everyactioncustom.com on behalf of Dana Sewall <dlsewall@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:03 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Dana Sewall
740 NW Cascade Ct Gresham, OR 97030-6653 dlsewall@comcast.net

ESTERSON Sarah * ODOE

From: lobopiedra@everyactioncustom.com on behalf of Ricardo Lopez <lobopiedra@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:03 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr Ricardo Lopez
118 INFIERNILLO Tijuana, CA 22505
lobopiedra@hotmail.com

ESTERSON Sarah * ODOE

From: manelson316@everyactioncustom.com on behalf of Marianne Nelson <manelson316@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:05 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Marianne Nelson
1644 SE Rex St Portland, OR 97202-6061
manelson316@yahoo.com

ESTERSON Sarah * ODOE

From: tushi43@everyactioncustom.com on behalf of Tess Husbands <tushi43@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:06 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction. We are killing Earth and the evolutionary event that provided life as we know it or the appearance of plants and trees on the land's surface, to help the climate? California killed and raped this event to help the climate; however, trees and plants, especially trees, shade Earth from the heat of the sun. Trees and plants also transpire the vital climate cooling water cycle, vital for cooling of the climate. And, trees sequester and store the climate warming gases, and when sliced and chopped down, all of the climate warming gases escape into the atmosphere to warm and heat up the climate.

Sincerely,
Mrs. Tess Husbands
5521 Cloud Way San Diego, CA 92117-1309 tushi43@hotmail.com

ESTERSON Sarah * ODOE

From: xsecretsx@everyactioncustom.com on behalf of James Mulcare <xsecretsx@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:07 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr James Mulcare
1110 Benjamin St Clarkston, WA 99403-2576 xsecretsx@cableone.net

ESTERSON Sarah * ODOE

From: dbrewer13@everyactioncustom.com on behalf of David Brewer <dbrewer13@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:10 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. David Brewer
39100 Camp Creek Rd Springfield, OR 97478-7721 dbrewer13@msn.com

ESTERSON Sarah * ODOE

From: hoepagirl@everyactioncustom.com on behalf of Natalie Van Leekwijck <hoepagirl@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:12 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Miss Natalie Van Leekwijck
444 Munn St Hazard, NE 68844-4436
hoepagirl@gmail.com

ESTERSON Sarah * ODOE

From: monstergrrl31@everyactioncustom.com on behalf of Meagan Elizabeth Oltman <monstergrrl31@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:13 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs Meagan Elizabeth Oltman
1057 Linda Way Brigham City, UT 84302-3141 monstergrrl31@gmail.com

ESTERSON Sarah * ODOE

From: anitay22@everyactioncustom.com on behalf of Anita Youabian <anitay22@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:13 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Miss Anita Youabian
10725 Ohio Ave Los Angeles, CA 90024-5067 anitay22@hotmail.com

ESTERSON Sarah * ODOE

From: earthlady@everyactioncustom.com on behalf of Judy Miller-Lyons <earthlady@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:14 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Judy Miller-Lyons
14 Rockridge Dr Highland Mills, NY 10930-6820 earthlady@optonline.net

ESTERSON Sarah * ODOE

From: debbiedoesfinance@everyactioncustom.com on behalf of Debbie Williams <debbiedoesfinance@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:15 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Debbie Williams
273 18 DEL MONTE Ln Menifee, CA 92586
debbiedoesfinance@yahoo.com

ESTERSON Sarah * ODOE

From: bxb174@everyactioncustom.com on behalf of Beaty Broughton <bxb174@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:16 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Beaty Broughton
606 Glen Willow Rd Avondale, PA 19311-9523 bxb174@aol.com

ESTERSON Sarah * ODOE

From: Bob.MaryHughes@everyactioncustom.com on behalf of Mary Hughes <Bob.MaryHughes@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Mary Hughes
2895 SE Glenn St Corvallis, OR 97333-2169 Bob.MaryHughes@comcast.net

ESTERSON Sarah * ODOE

From: jj@everyactioncustom.com on behalf of Jonathan Jelen <jj@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Jonathan Jelen
5825 N Greeley Ave Portland, OR 97217-4145 jj@oregonwild.org

ESTERSON Sarah * ODOE

From: thomae.mdt0710@everyactioncustom.com on behalf of Martha Thomae <thomae.mdt0710@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions. It would seem this is. to the place nor the time for this project and a further extension would just drag the discussion out and not protect the value and beauty of the area.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied. Understanding the needs of these birds and plans to assure no harm is done are developing as new information is gained yet the project instigator has not indicated any efforts to stay abreast of changing conditions and information.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Martha Thomae
PO Box 575 Uwchland, PA 19480-0575
thomae.mdt0710@gmail.com

ESTERSON Sarah * ODOE

From: aussiedogweb@everyactioncustom.com on behalf of Vernon Batty <aussiedogweb@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Vernon Batty
1160 Majestic Dr Pagosa Springs, CO 81147-7018 aussiedogweb@gmail.com

ESTERSON Sarah * ODOE

From: nkanderson5@everyactioncustom.com on behalf of Nancy Anderson <nkanderson5@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Nancy Anderson
330 SE 75th Ave Portland, OR 97215-1458 nkanderson5@comcast.net

ESTERSON Sarah * ODOE

From: theresasanders101@everyactioncustom.com on behalf of Theresa Sanders <theresasanders101@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Theresa Sanders
456 Walker Hollow Rd Flintstone, GA 30725-2688 theresasanders101@gmail.com

ESTERSON Sarah * ODOE

From: sabolch.horvat@everyactioncustom.com on behalf of Sabolch Horvat <sabolch.horvat@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:22 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Sabolch Horvat
4442 NE Alberta St Portland, OR 97218-1522 sabolch.horvat@gmail.com

ESTERSON Sarah * ODOE

From: lynnieray@everyactioncustom.com on behalf of Lynn Mattson <lynnieray@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:23 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Lynn Mattson
1112 Columbine Ct Fort Collins, CO 80521-1754 lynnieray@hotmail.com

ESTERSON Sarah * ODOE

From: lkogut@everyactioncustom.com on behalf of Lynne Ann Kogut <lkogut@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:23 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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Sincerely,
Ms. Lynne Ann Kogut
1170 7th St Florence, OR 97439-8376
lkogut@charter.net

ESTERSON Sarah * ODOE

From: hanniganjb@everyactioncustom.com on behalf of Bob Hannigan <hanniganjb@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:23 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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Sincerely,
Mr Bob Hannigan
1820 NW Hawthorn Pl Corvallis, OR 97330-1835 hanniganjb@comcast.net

ESTERSON Sarah * ODOE

From: necrohead56@everyactioncustom.com on behalf of Lisa Hammermeister <necrohead56@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:26 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Lisa Hammermeister
16456 Shamhart Dr Granada Hills, CA 91344-2857 necrohead56@gmail.com

ESTERSON Sarah * ODOE

From: suzimorse@everyactioncustom.com on behalf of Susan Morse <suzimorse@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:26 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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Sincerely,
Mrs. Susan Morse
17404 SE 15th Way Vancouver, WA 98683-9585 suzimorse@centurylink.net

ESTERSON Sarah * ODOE

From: incredistical@everyactioncustom.com on behalf of Kenneth Lapointe <incredistical@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:30 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. Kenneth Lapointe
2781 Mozart St Los Angeles, CA 90031-3022 incredistical@outlook.com

ESTERSON Sarah * ODOE

From: WolfClan27@everyactioncustom.com on behalf of Cathy Thomas <WolfClan27@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:30 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Cathy Thomas
6821 Greenvale Dr Richmond, VA 23225-2211 WolfClan27@yahoo.com

ESTERSON Sarah * ODOE

From: stoker@everyactioncustom.com on behalf of Wesley E.Stoker <stoker@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:32 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Wesley E. Stoker
30110 Highway 99E Shedd, OR 97377-9734
stoker@ecoregon.org

ESTERSON Sarah * ODOE

From: Graceswallow@everyactioncustom.com on behalf of Grace Neff <Graceswallow@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:32 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Grace Neff
800 28th Ave SE Albany, OR 97322-4177
Graceswallow@aol.com

ESTERSON Sarah * ODOE

From: wooflevi@everyactioncustom.com on behalf of Dana Bleckinger <wooflevi@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:36 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Dana Bleckinger
1045 Driftwood Ln Yachats, OR 97498-9748 wooflevi@yahoo.com

ESTERSON Sarah * ODOE

From: Sjogrenkaren2@everyactioncustom.com on behalf of Karen Sjogren <Sjogrenkaren2@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:36 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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Sincerely,
Ms. Karen Sjogren
521 Taybin Rd NW Salem, OR 97304-3055
Sjogrenkaren2@gmail.com

ESTERSON Sarah * ODOE

From: steve.oder@everyactioncustom.com on behalf of Stephen Oder <steve.oder@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:36 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Stephen Oder
1865 1/2 NE Seavy Ave Corvallis, OR 97330-4498 steve.oder@gmail.com

ESTERSON Sarah * ODOE

From: blockwood@everyactioncustom.com on behalf of Elizabeth A Lockwood <blockwood@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:37 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions. It is time that the project be reviewed more closely, considering the poorly sited project, the unacceptable risks to golden eagles and bald eagles, and the impact on the scenic beauty of the area.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction. I feel that the developer is going to just keep postponing project development until they think they can sneak it through without any objections from the public or environmental groups. The developer needs to make his project environmentally responsible and update it as needed.

Sincerely,
Ms. Elizabeth A Lockwood
5668 Glacier Dr Springfield, OR 97478-6924 blockwood@mwivet.com

ESTERSON Sarah * ODOE

From: abumbak@everyactioncustom.com on behalf of Anne Bumbak <abumbak@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:46 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Anne Bumbak
6509 Marsol Rd Apt 509 Mayfield Heights, OH 44124-3531 abumbak@cuyahogalibrary.org

ESTERSON Sarah * ODOE

From: Kmabreylott@everyactioncustom.com on behalf of Kristina Mabrey Lott <Kmabreylott@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:46 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Kristina Mabrey Lott
1115 1st Ave W Mobridge, SD 57601-1706
Kmabreylott@gmail.com

ESTERSON Sarah * ODOE

From: seawolf22pdx@everyactioncustom.com on behalf of Valerie Adell <seawolf22pdx@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:49 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Valerie Adell
1325 NE 78th Ave Portland, OR 97213-6819 seawolf22pdx@gmail.com

ESTERSON Sarah * ODOE

From: babunina10@everyactioncustom.com on behalf of Nina Council <babunina10@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:50 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Nina Council
2970 Diane St Ashland, OR 97520-1432
babunina10@mind.net

ESTERSON Sarah * ODOE

From: charlesntownsend@everyactioncustom.com on behalf of Charles Townsend <charlesntownsend@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:53 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Charles Townsend
623 NE Morris St Portland, OR 97212-3162 charlesntownsend@gmail.com

ESTERSON Sarah * ODOE

From: lludwicki@everyactioncustom.com on behalf of Lawrence Ludwicki <lludwicki@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:55 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Lawrence Ludwicki
38968 Holsworth Ct Farmington Hills, MI 48331-1605 lludwicki@hotmail.com

ESTERSON Sarah * ODOE

From: jpn5710@everyactioncustom.com on behalf of John Nettleton <jpn5710@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:56 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. John Nettleton
4311 SE 37th Ave Apt 21 Portland, OR 97202-3265 jpn5710@yahoo.com

ESTERSON Sarah * ODOE

From: jadbeckwith@everyactioncustom.com on behalf of Jane beckwith <jadbeckwith@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:56 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Jane beckwith
1550 E 43rd Ave Eugene, OR 97405-4407
jadbeckwith@hotmail.com

ESTERSON Sarah * ODOE

From: m.millhollen@everyactioncustom.com on behalf of Michael Millhollen <m.millhollen@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:57 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Michael Millhollen
3 Hillshire Dr Lake Oswego, OR 97034-7374 m.millhollen@comcast.net

ESTERSON Sarah * ODOE

From: chazcat@everyactioncustom.com on behalf of Linda Gioia <chazcat@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:58 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Linda Gioia
6 Millholland Dr Fishkill, NY 12524-1509 chazcat@gmail.com

ESTERSON Sarah * ODOE

From: tibetsun20@everyactioncustom.com on behalf of Linda Ferland <tibetsun20@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 2:59 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Linda Ferland
43 Pearl St Claremont, NH 03743-2553
tibetsun20@protonmail.com

ESTERSON Sarah * ODOE

From: asmodeus_hru@everyactioncustom.com on behalf of Asmodeus Hru <asmodeus_hru@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:03 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Asmodeus Hru
2435 University Ave Riverside, CA 92507-4265 asmodeus_hru@yahoo.com

ESTERSON Sarah * ODOE

From: rpeyde@everyactioncustom.com on behalf of Pamela Eyde <rpeyde@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:04 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Pamela Eyde
13655 SW Bonnie Brae St Beaverton, OR 97005-4342 rpeyde@yahoo.com

ESTERSON Sarah * ODOE

From: animlman@everyactioncustom.com on behalf of Michael Varichak <animlman@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:07 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Michael Varichak
4 Coach Rd Danbury, CT 06811-4301
animlman@hotmail.com

ESTERSON Sarah * ODOE

From: sandy.kuhns@everyactioncustom.com on behalf of Sandy Kuhns <sandy.kuhns@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:08 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Sandy Kuhns
1380 SW Scott St Corvallis, OR 97333-1001 sandy.kuhns@comcast.net

ESTERSON Sarah * ODOE

From: lswoodall@everyactioncustom.com on behalf of Sandra Woodall <lswoodall@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:08 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Sandra Woodall
118 Hermine Blvd San Antonio, TX 78212-1203 lswoodall@gmail.com

ESTERSON Sarah * ODOE

From: schreibdemstein@everyactioncustom.com on behalf of Lorenz Steininger <schreibdemstein@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:11 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Lorenz Steininger
13 Main St Spotsylvania, VA 22553
schreibdemstein@posteo.de

ESTERSON Sarah * ODOE

From: carollemley@everyactioncustom.com on behalf of Carol Lemley <carollemley@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:14 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Carol Lemley
PO Box 4114 Bend, OR 97707-1114
carollemley@gmail.com

ESTERSON Sarah * ODOE

From: nanykat@everyactioncustom.com on behalf of Nanette Oggiono <nanykat@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:14 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Nanette Oggiono
3 Sadler Rd Upton, MA 01568-1424
nanykat@aol.com

ESTERSON Sarah * ODOE

From: harkor@everyactioncustom.com on behalf of Pat A <harkor@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:15 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Pat A
820 Hitchcock Ave Lisle, IL 60532-2309
harkor@comcast.net

ESTERSON Sarah * ODOE

From: beachie47@everyactioncustom.com on behalf of Susan Glarum <beachie47@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:16 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms Susan Glarum
563 N Laurel St Cannon Beach, OR 97110-3109 beachie47@gmail.com

ESTERSON Sarah * ODOE

From: lapaget@everyactioncustom.com on behalf of Ted Lapage <lapaget@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:16 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr Ted Lapage
2026 NW Lance Way Corvallis, OR 97330-2211 lapaget@peak.org

ESTERSON Sarah * ODOE

From: barbara.bb@everyactioncustom.com on behalf of Barbara Blackwood <barbara.bb@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:18 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Barbara Blackwood
11916 E 25th Ave Spokane Valley, WA 99206-5728 barbara.bb@comcast.net

ESTERSON Sarah * ODOE

From: mjchobert@everyactioncustom.com on behalf of Marie-José CHOBERT <mjchobert@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:19 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Marie-José CHOBERT
RUE GUILLAUME APOLLINAIRE Saint Jean De Braye, MT 45800 mjchobert@hotmail.fr

ESTERSON Sarah * ODOE

From: kathycallaway@everyactioncustom.com on behalf of Katherine Anne Stansbury <kathycallaway@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Katherine Anne Stansbury
15170 Thayer Rd Oregon City, OR 97045-9377 kathycallaway@whiz.to

ESTERSON Sarah * ODOE

From: pamz@everyactioncustom.com on behalf of Pamela Miller <pamz@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Pamela Miller
6230 Thomas Ct Tolar, TX 76476-6917
pamz@pamelazmiller.com

ESTERSON Sarah * ODOE

From: alyson287@everyactioncustom.com on behalf of Alyson Dal Ponte <alyson287@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:24 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Alyson Dal Ponte
2001 Table Rock Rd Apt 46 Medford, OR 97501-1486 alyson287@gmail.com

ESTERSON Sarah * ODOE

From: elise.jardine@everyactioncustom.com on behalf of Elise Jardine <elise.jardine@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:24 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Elise Jardine
3697 Cainsville Rd Lebanon, TN 37090-7764 elise.jardine@live.com

ESTERSON Sarah * ODOE

From: nancykweil@everyactioncustom.com on behalf of Nancy Weil <nancykweil@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:27 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Nancy Weil
6085 Columbia St Arch Cape, OR 97102-0158 nancykweil@gmail.com

ESTERSON Sarah * ODOE

From: rwarren841@everyactioncustom.com on behalf of Bob Warren <rwarren841@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:28 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

I find it particularly galling that the Oregon Department of Energy is hellbent on desecrating the Oregon landscape by installing huge wind energy turbines that offer no benefit to Oregon at all, in order to produce power to to into the grid.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Bob Warren
2590 Lincoln St Eugene, OR 97405-2639
rwarren841@msn.com

ESTERSON Sarah * ODOE

From: elaine.lane@everyactioncustom.com on behalf of Elaine Lane <elaine.lane@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:29 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Elaine Lane
25380 W Valley Hwy Sheridan, OR 97378-9746 elaine.lane@grandronde.org

ESTERSON Sarah * ODOE

From: h.knapp@everyactioncustom.com on behalf of Harry Knapp <h.knapp@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:29 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

>>>It maybe necessary to down-size this project or eliminate all
>>>tighter, in favor of a better site.<<<<

Sincerely,
Mr. Harry Knapp
2560 Colgate Way Riverside, CA 92507-2744 h.knapp@charter.net

ESTERSON Sarah * ODOE

From: tweiss68@everyactioncustom.com on behalf of Cheryl Weiss <tweiss68@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:31 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Cheryl Weiss
123 Holiday Mobile Home Park Granite City, IL 62040-6568 tweiss68@yahoo.com

ESTERSON Sarah * ODOE

From: dkvoves@everyactioncustom.com on behalf of Deborah Voves <dkvoves@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:32 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Deborah Voves
13231 Mountain Pl Anchorage, AK 99516-3150 dkvoves@gci.net

ESTERSON Sarah * ODOE

From: travisallen2000@everyactioncustom.com on behalf of Travis Allen <travisallen2000@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:33 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Travis Allen
2915 Oak St Eugene, OR 97405-3713
travisallen2000@yahoo.com

ESTERSON Sarah * ODOE

From: purrmarshal@everyactioncustom.com on behalf of Susan Drew <purrmarshal@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:35 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Ms. Susan Drew
37770 Highway 26 Sandy, OR 97055-6554
purrmarshal@yahoo.com

ESTERSON Sarah * ODOE

From: HELENJCASWELL@everyactioncustom.com on behalf of Helen Caswell <HELENJCASWELL@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:35 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

It's so important that we achieve multiples complementary goals when we work with our unique Oregon landscape. I am concerned about the request for Amendment #4 for the site certificate for the Summit Ridge Wind Farm.

I urge EFSC to deny Pattern's request to extend the deadlines a third time, since the repeated delays to the project suggest that it is poorly conceived.

My special concern is for raptors like eagles, and my understanding is that studies conducted years ago are outdated. While the developer wants an extension of deadlines, it has still not conducted updated surveys of these populations.

Let's develop our energy profile while also protecting important raptor species. This project should be halted immediately.

Thank you,

Sincerely,
MS. Helen Caswell
4190 12th St SE Salem, OR 97302-1873
HELENJCASWELL@GMAIL.COM

ESTERSON Sarah * ODOE

From: kbuttercup@everyactioncustom.com on behalf of Kelly Kiraly <kbuttercup@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:39 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Kelly Kiraly
3941 NW Devoto Ln Portland, OR 97229-8096 kbuttercup@gmail.com

ESTERSON Sarah * ODOE

From: truth58@everyactioncustom.com on behalf of Kathryn Lemoine <truth58@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:47 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Kathryn Lemoine
106 Parkwest Dr Bldg 3-C West Monroe, LA 71291-5372 truth58@outlook.com

ESTERSON Sarah * ODOE

From: elizabeth.watts@everyactioncustom.com on behalf of Elizabeth Watts <elizabeth.watts@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:48 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Elizabeth Watts
513 SE 27th Way Boynton Beach, FL 33435-8904 elizabeth.watts@verizon.net

ESTERSON Sarah * ODOE

From: jaimai@everyactioncustom.com on behalf of Stanley Perry <jaimai@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:52 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
mr Stanley Perry
345 Salem Heights Ave S Salem, OR 97302-5606 jaimai@aol.com

ESTERSON Sarah * ODOE

From: rossijos13@everyactioncustom.com on behalf of Greta Rossi <rossijos13@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:54 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Greta Rossi
490 Washburn Ave Washington, NJ 07882-2416 rossijos13@gmail.com

ESTERSON Sarah * ODOE

From: kimmessmerphoto@everyactioncustom.com on behalf of Kim Messmer <kimmessmerphoto@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:54 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Kim Messmer
2599 Amethyst Dr Santa Clara, CA 95051-1154 kimmessmerphoto@yahoo.com

ESTERSON Sarah * ODOE

From: sluminoso1@everyactioncustom.com on behalf of Randall Gicker <sluminoso1@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:56 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Randall Gicker
56344 Delta Dr Blue River, OR 97413-9733 sluminoso1@gmail.com

ESTERSON Sarah * ODOE

From: holm.gordon@everyactioncustom.com on behalf of Gordon Holm <holm.gordon@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:56 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Gordon Holm
159 Littlejohn Rd Troy, OH 45373-1514
holm.gordon@yahoo.com

ESTERSON Sarah * ODOE

From: marshasq0146@everyactioncustom.com on behalf of Marsha Squibb <marshasq0146@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:57 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Marsha Squibb
1 Upton Hills Ln Middleton, MA 01949-1904 marshasq0146@gmail.com

ESTERSON Sarah * ODOE

From: louise@everyactioncustom.com on behalf of Louise Alford <louise@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:57 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Louise Alford
2992 Friendly St Eugene, OR 97405-2336
louise@99west.com

ESTERSON Sarah * ODOE

From: marian.cruz2903@everyactioncustom.com on behalf of Marian Cruz <marian.cruz2903@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:02 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Marian Cruz
3460 R St Unit 401 Merced, CA 95348-2374 marian.cruz2903@gmail.com

ESTERSON Sarah * ODOE

From: barbaran2323@everyactioncustom.com on behalf of Barbara Ginsberg <barbaran2323@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:03 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Barbara Ginsberg
2355 Brommer St Spc 50 Santa Cruz, CA 95062-3561 barbaran2323@gmail.com

ESTERSON Sarah * ODOE

From: dmmonico@everyactioncustom.com on behalf of Diane Monico <dmmonico@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:06 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Without that survey information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other birds. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern Energy has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

If Pattern Energy desires to move forward with this controversial project, it should file a new application, complete with current data and information on ways it will mitigate its impact on eagles and other birds.

Sincerely,
Ms. Diane Monico
PO Box 274 Nehalem, OR 97131-0274
dmmonico@yahoo.com

ESTERSON Sarah * ODOE

From: gk2829@everyactioncustom.com on behalf of Gabrielle Karras <gk2829@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:09 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Gabrielle Karras
4210 SE Bybee Blvd Portland, OR 97206-7753 gk2829@hotmail.com

ESTERSON Sarah * ODOE

From: masflo222@everyactioncustom.com on behalf of Milton And Shirley Nelson <masflo222@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:10 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Milton And Shirley Nelson
1451 Spruce St Apt 323 Florence, OR 97439-9682 masflo222@gmail.com

ESTERSON Sarah * ODOE

From: i_fb_2010@everyactioncustom.com on behalf of Irmgard Gutersohn <i_fb_2010@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:12 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Irmgard Gutersohn
SALEM Dr El Paso, TX 79924
i_fb_2010@yahoo.de

ESTERSON Sarah * ODOE

From: alicjamn@everyactioncustom.com on behalf of Alicja Nichols <alicjamn@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:13 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Alicja Nichols
PO Box 1045 Oakridge, OR 97463-1045
alicjamn@msn.com

ESTERSON Sarah * ODOE

From: travel_pet2@everyactioncustom.com on behalf of Annie Wei <travel_pet2@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:13 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Annie Wei
22 WARD St Queenslnad, HI 48700
travel_pet2@hotmail.com

ESTERSON Sarah * ODOE

From: starr.loran@everyactioncustom.com on behalf of Loran Starr <starr.loran@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:15 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Loran Starr
3125 N Terry St Portland, OR 97217-6137 starr.loran@gmail.com

ESTERSON Sarah * ODOE

From: lgordin23@everyactioncustom.com on behalf of Lawrence Gordin <lgordin23@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:17 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

We need intelligent solutions to climate change while not doing further damage to the environment and wildlife.
The most crucial problem we face is climate change. Humans in their blissful denial of climate change are giving lemmings a bad name. We're all on a driverless train speeding down an ever steepening mountain heading toward a cliff.
Or, in actuality, we've already plunged off that cliff and are in free fall. We're enjoying the feeling of weightlessness and the wind in our face like a dog with his head out the car window. No worries till we hit the ground.

Sincerely,
Mr Lawrence Gordin
15401 River Cove Ct North Fort Myers, FL 33917-3125 lgordin23@gmail.com

ESTERSON Sarah * ODOE

From: pdjburton@everyactioncustom.com on behalf of Patricia Burton <pdjburton@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:19 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Patricia Burton
17120 Queen Victoria Ct Apt 302 Gaithersburg, MD 20877-3651 pdjburton@yahoo.com

ESTERSON Sarah * ODOE

From: dadcos@everyactioncustom.com on behalf of Dennis Morley <dadcos@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Dennis Morley
104 Throckmorton Ln Old Bridge, NJ 08857-2221 dadcos@optonline.net

ESTERSON Sarah * ODOE

From: atticuss@everyactioncustom.com on behalf of Christine Stewart <atticuss@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Dr. Christine Stewart
307 Whippoorwill Gln Escondido, CA 92026-1461 atticuss@pacbell.net

ESTERSON Sarah * ODOE

From: sedna101@everyactioncustom.com on behalf of Reverend Jane Eagle <sedna101@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.
They make wind turbines without blades for bird safety. This is what we should be investing in.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Ms. Reverend Jane Eagle
510 Edison St Graton, CA 95444-9351
sedna101@aol.com

ESTERSON Sarah * ODOE

From: wildonionyoga@everyactioncustom.com on behalf of Cheryl Henley <wildonionyoga@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Cheryl Henley
1203 Washington St Evanston, IL 60202-1621 wildonionyoga@live.com

ESTERSON Sarah * ODOE

From: rreed@everyactioncustom.com on behalf of Robert M and Carol G Reed <rreed@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:28 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Robert M and Carol G Reed
72 Stoney Dr Hardyville, VA 23070-2152
rreed@va.metrocast.net

ESTERSON Sarah * ODOE

From: calminsensehypnosis@everyactioncustom.com on behalf of Sara Fogan <calminsensehypnosis@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:29 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Miss Sara Fogan
23916 Plaza Gavilan Valencia, CA 91355-2807 calminsensehypnosis@yahoo.com

ESTERSON Sarah * ODOE

From: mlstep@everyactioncustom.com on behalf of Margaret Stephens <mlstep@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:30 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Margaret Stephens
1830 23rd St NE Salem, OR 97301-8142
mlstep@msn.com

ESTERSON Sarah * ODOE

From: nanlc999@everyactioncustom.com on behalf of Nancy Chismar <nanlc999@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:31 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Nancy Chismar
6 York Dr Apt 6A Edison, NJ 08817-4953
nanlc999@optonline.net

ESTERSON Sarah * ODOE

From: imhurdles@everyactioncustom.com on behalf of Larry Callaway <imhurdles@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:35 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. Larry Callaway
593 Murin St Eugene, OR 97402-1505
imhurdles@gmail.com

ESTERSON Sarah * ODOE

From: orcawolf@everyactioncustom.com on behalf of Joyce Robinson <orcawolf@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:37 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
ms Joyce Robinson
8010 Covington Ave Glen Burnie, MD 21061-4989 orcawolf@cablespeed.com

ESTERSON Sarah * ODOE

From: lee.m.zucker@everyactioncustom.com on behalf of Marguery Lee Zucker <lee.m.zucker@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:39 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Marguery Lee Zucker
1966 Orchard St Same Eugene, OR 97403-2040 lee.m.zucker@gmail.com

ESTERSON Sarah * ODOE

From: abbey.zap@everyactioncustom.com on behalf of Abbey Zap <abbey.zap@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:39 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mrs. Abbey Zap
1596 SW 5th Ave Boca Raton, FL 33432-7240 abbey.zap@gmail.com

ESTERSON Sarah * ODOE

From: Mikla_2000@everyactioncustom.com on behalf of Cristen McConville <Mikla_2000@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:43 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Cristen McConville
23 Adalist Ave Butler, NJ 07405-1703
Mikla_2000@yahoo.com

ESTERSON Sarah * ODOE

From: dnns_hebert@everyactioncustom.com on behalf of Dennis Hebert <dnns_hebert@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:49 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Dennis Hebert
850 E 38th Ave Eugene, OR 97405-4530
dnns_hebert@yahoo.com

ESTERSON Sarah * ODOE

From: tlknkr@everyactioncustom.com on behalf of Susanna Askins <tlknkr@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:53 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Susanna Askins
14640 NE Russell Ct Portland, OR 97230-3855 tlknkr@gmail.com

ESTERSON Sarah * ODOE

From: lisa.daloia@everyactioncustom.com on behalf of Lisa Daloia <lisa.daloia@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 4:53 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Lisa Daloia
43 Country Side Loop Elkton, MD 21921-3308 lisa.daloia@yahoo.com

ESTERSON Sarah * ODOE

From: billkucha@everyactioncustom.com on behalf of Bill Kucha <billkucha@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:04 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Bill Kucha
3673 Otter Crest Loop # LO Depoe Bay, OR 97341-9779 billkucha@gmail.com

ESTERSON Sarah * ODOE

From: pcscranton@everyactioncustom.com on behalf of Chris Scranton <pcscranton@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:05 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Chris Scranton
1440 NE Richards Ln Madras, OR 97741-9489 pcscranton@msn.com

ESTERSON Sarah * ODOE

From: susieps2@everyactioncustom.com on behalf of Susan Stevens-Briody <susieps2@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:05 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Susan Stevens-Briody
1060 Bay St Apt 2 Florence, OR 97439-9310 susieps2@yahoo.com

ESTERSON Sarah * ODOE

From: marwrog@everyactioncustom.com on behalf of Mark Rogers <marwrog@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:06 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Dr. Mark Rogers
40601 SE Kubitz Rd Sandy, OR 97055-8517 marwrog@gmail.com

ESTERSON Sarah * ODOE

From: Valerieb09@everyactioncustom.com on behalf of Valerie Bergeron <Valerieb09@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:09 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Valerie Bergeron
39 Colonial Vlg Somersworth, NH 03878-1553 Valerieb09@hotmail.com

ESTERSON Sarah * ODOE

From: jacobkms@everyactioncustom.com on behalf of Jacob Wallace <jacobkms@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:14 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. Jacob Wallace
704 N Baldwin St Portland, OR 97217-1312 jacobkms@gmail.com

ESTERSON Sarah * ODOE

From: halseyswain@everyactioncustom.com on behalf of halsey swain <halseyswain@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:15 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. halsey swain
704 N Baldwin St Portland, OR 97217-1312 halseyswain@gmail.com

ESTERSON Sarah * ODOE

From: 1cb.images@everyactioncustom.com on behalf of Christine Bennett <1cb.images@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:15 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Miss Christine Bennett
PO Box 1003 Forest Grove, OR 97116-4003 1cb.images@gmail.com

ESTERSON Sarah * ODOE

From: jumpireland@everyactioncustom.com on behalf of Kristin Conley <jumpireland@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:16 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Kristin Conley
Crooked Finger Rd Silverton, OR 97375
jumpireland@earthlink.net

ESTERSON Sarah * ODOE

From: hampden57@everyactioncustom.com on behalf of Christopher Toye <hampden57@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:17 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Christopher Toye
2185 160th St Clarinda, IA 51632-5019
hampden57@yahoo.co.uk

ESTERSON Sarah * ODOE

From: serna.jess@everyactioncustom.com on behalf of Jessica Serna <serna.jess@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:18 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Jessica Serna
7031 NE 18th Ave Portland, OR 97211-5204 serna.jess@gmail.com

ESTERSON Sarah * ODOE

From: Lindaeart@everyactioncustom.com on behalf of Linda Eisele <Lindaeart@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:23 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
ms Linda Eisele
60669 River Bend Dr Bend, OR 97702-8945 Lindaeart@gmail.com

ESTERSON Sarah * ODOE

From: jmjkla@everyactioncustom.com on behalf of Joann Koch <jmjkla@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:29 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I strongly urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Joann Koch
134 Olenick Rd Lebanon, CT 06249-2026
jmjkla@yahoo.com

ESTERSON Sarah * ODOE

From: bmanildi@everyactioncustom.com on behalf of Barbara Manildi <bmanildi@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:32 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Dr. Barbara Manildi
3525 Red Cedar Way Lake Oswego, OR 97035-3523 bmanildi@earthlink.net

ESTERSON Sarah * ODOE

From: hklimeck@everyactioncustom.com on behalf of Helen Klimeck-Jones <hklimeck@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:37 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time. Exploring clean alternatives for energy is so important, but so is protecting our wildlife.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Helen Klimeck-Jones
2215 River Heights Cir West Linn, OR 97068-4050 hklimeck@yahoo.com

ESTERSON Sarah * ODOE

From: luvtrees@everyactioncustom.com on behalf of Kacey Donston <luvtrees@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:37 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Kacey Donston
6140 Canary Rd Westlake, OR 97493-9705
luvtrees@gmail.com

ESTERSON Sarah * ODOE

From: meryle.korn@everyactioncustom.com on behalf of Meryle A.Korn <meryle.korn@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:44 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Many years ago I saw an alternate style of wind turbine. Instead of having the common three long blades, already known to be hazardous to eagles, hawks, and other birds, the "spinner" was incorporated into an open-sided stanchion and was far less dangerous to birds. Whether this design was abandoned due to cost factors or for some other reasons, I do not know, but I truly believe a safer wind turbine should be used.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Meryle A. Korn
2821 Huron St Bellingham, WA 98226-4112 meryle.korn@gmail.com

ESTERSON Sarah * ODOE

From: corinaaleman@everyactioncustom.com on behalf of Corina Aleman <corinaaleman@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:46 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Corina Aleman
1036 Kelly Blvd Springfield, OR 97477-3742 corinaaleman@gmail.com

ESTERSON Sarah * ODOE

From: nanck@everyactioncustom.com on behalf of nancy porter <nanck@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:47 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. nancy porter
1945 Harvard Dr Eugene, OR 97405-1076
nanck@hotmail.com

ESTERSON Sarah * ODOE

From: pasn201@everyactioncustom.com on behalf of Patricia Nazzaro <pasn201@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:48 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Patricia Nazzaro
10020 Calava Ct Union, KY 41091-9086
pasn201@yahoo.com

ESTERSON Sarah * ODOE

From: lerves@everyactioncustom.com on behalf of Lenore Reeves <lerves@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:50 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Lenore Reeves
19934 Hickory Stick Ln Mokena, IL 60448-1368 lerves@gmail.com

ESTERSON Sarah * ODOE

From: j.genandt@everyactioncustom.com on behalf of Judy Genandt <j.genandt@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:52 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Judy Genandt
710 Timothy Ct East Dundee, IL 60118-3038 j.genandt@sbcglobal.net

ESTERSON Sarah * ODOE

From: wolfhowlmama@everyactioncustom.com on behalf of Lydia Garvey <wolfhowlmama@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 5:58 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Lydia Garvey
429 S 24th St Clinton, OK 73601-3713
wolfhowlmama@yahoo.com

ESTERSON Sarah * ODOE

From: campcarole17@everyactioncustom.com on behalf of Carole Gardiner <campcarole17@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:02 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Carole Gardiner
9600 Palisades Park Rd Boca Raton, FL 33428-1746 campcarole17@bellsouth.net

ESTERSON Sarah * ODOE

From: coyotemarten@everyactioncustom.com on behalf of Richard Martin <coyotemarten@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:05 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Richard Martin
5100 NW Highway 99 Corvallis, OR 97330-9428 coyotemarten@gmail.com

ESTERSON Sarah * ODOE

From: joosgalefamily@everyactioncustom.com on behalf of Sandra Joos <joosgalefamily@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:05 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Dr. Sandra Joos
4259 SW Patrick Pl Portland, OR 97239-7202 joosgalefamily@comcast.net

ESTERSON Sarah * ODOE

From: dovemtaz@everyactioncustom.com on behalf of Michele Frisella <dovemtaz@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:08 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Michele Frisella
2220 NE 61st Ave Portland, OR 97213-4148 dovemtaz@gmail.com

ESTERSON Sarah * ODOE

From: harryjwjr@everyactioncustom.com on behalf of Harry Wohlsein <harryjwjr@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:09 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Harry Wohlsein
14724 SE Linden Ln Milwaukie, OR 97267-1249 harryjwjr@gmail.com

ESTERSON Sarah * ODOE

From: jennjtrot@everyactioncustom.com on behalf of Jennifer Trotter <jennjtrot@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:11 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Jennifer Trotter
PO Box 182 Drain, OR 97435-0182
jennjtrot@gmail.com

ESTERSON Sarah * ODOE

From: karkie7@everyactioncustom.com on behalf of Karla Watson <karkie7@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:12 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Karla Watson
206 Leonard Ave Fayette, MO 65248-8635
karkie7@sbcglobal.net

ESTERSON Sarah * ODOE

From: Lametreza@everyactioncustom.com on behalf of Alicia Jackson <Lametreza@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:16 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Dr. Alicia Jackson
401 Goheen Cir Vallejo, CA 94591-4114
Lametreza@yahoo.com

ESTERSON Sarah * ODOE

From: beezledorf@everyactioncustom.com on behalf of Joanna Defelice <beezledorf@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:16 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Joanna Defelice
1375 W 5th Ave Eugene, OR 97402-4524
beezledorf@gmail.com

ESTERSON Sarah * ODOE

From: gmassoll@everyactioncustom.com on behalf of Gail Massoll <gmassoll@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:18 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Gail Massoll
922 NW 11th Ave Apt 203 Portland, OR 97209-2776 gmassoll@me.com

ESTERSON Sarah * ODOE

From: mark.becker@everyactioncustom.com on behalf of Mark Becker <mark.becker@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Mark Becker
10750 SW Wedgewood St Portland, OR 97225-5129 mark.becker@becker-llc.com

ESTERSON Sarah * ODOE

From: mrrails@everyactioncustom.com on behalf of cave man <mrrails@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. cave man
609 Main St New York, NY 10044-0022
mrrails@yahoo.ca

ESTERSON Sarah * ODOE

From: btlamb@everyactioncustom.com on behalf of Barbara Lamb <btlamb@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:23 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Barbara Lamb
5017 Cedar Acres Ln Langley, WA 98260-9208 btlamb@whidbey.com

ESTERSON Sarah * ODOE

From: wakiwon@everyactioncustom.com on behalf of Mary Garcia <wakiwon@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:26 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Mary Garcia
422 N 2nd St Silverton, OR 97381-1708
wakiwon@gmail.com

ESTERSON Sarah * ODOE

From: vintgal009@everyactioncustom.com on behalf of Valerie Hildebrand <vintgal009@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:30 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Valerie Hildebrand
MARIONCLIFF Dr Parma, OH 44134
vintgal009@gmail.com

ESTERSON Sarah * ODOE

From: mtwilliams@everyactioncustom.com on behalf of Michael Williams <mtwilliams@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:32 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Michael Williams
PO Box 11392 Eugene, OR 97440-3592
mtwilliams@nu-world.com

ESTERSON Sarah * ODOE

From: hummelcvk@everyactioncustom.com on behalf of Valoree Hummel <hummelcvk@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:36 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Valoree Hummel
205 Scenic Ridge Ct Redmond, OR 97756-7418 hummelcvk@gmail.com

ESTERSON Sarah * ODOE

From: susanmgeer@everyactioncustom.com on behalf of Susan Geer <susanmgeer@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:47 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Susan Geer
906 Penn Ave La Grande, OR 97850-2218
susanmgeer@gmail.com

ESTERSON Sarah * ODOE

From: martinblacksheep@everyactioncustom.com on behalf of Sally Martin <martinblacksheep@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:48 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Sally Martin
19839 Highway 213 Apt 1011 Oregon City, OR 97045-7947 martinblacksheep@gmail.com

ESTERSON Sarah * ODOE

From: kaliel@everyactioncustom.com on behalf of Susan Bechtholt <kaliel@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:56 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Susan Bechtholt
5290 Banner Rd SE Port Orchard, WA 98367-9764 kaliel@juno.com

ESTERSON Sarah * ODOE

From: btrbrdgdn2@everyactioncustom.com on behalf of Mitchell Dormont <btrbrdgdn2@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:57 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Mitchell Dormont
19 B John Paul Jones Dr Monroe Township, NJ 08831-5459 btrbrdgdn2@gmail.com

ESTERSON Sarah * ODOE

From: maryp61@everyactioncustom.com on behalf of Mary Parham <maryp61@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:58 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Mary Parham
12291 SW Knoll Dr Apt 114 Tigard, OR 97223-8275 maryp61@live.com

ESTERSON Sarah * ODOE

From: smc320@everyactioncustom.com on behalf of Scott Crockett <smc320@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:00 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Scott Crockett
PO Box 810 Florence, OR 97439-0033
smc320@msn.com

ESTERSON Sarah * ODOE

From: gdpsoia@everyactioncustom.com on behalf of Gabor Petry <gdpsoia@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:12 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Gabor Petry
35134 Dunston Dr Sterling Heights, MI 48310-4939 gdpsoia@hotmail.com

ESTERSON Sarah * ODOE

From: redpeelingbark@everyactioncustom.com on behalf of Casey Cunningham <redpeelingbark@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:14 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Casey Cunningham
7037 NE 8th Ave Portland, OR 97211-3523 redpeelingbark@gmail.com

ESTERSON Sarah * ODOE

From: sherpoodle@everyactioncustom.com on behalf of Sherry Dunn <sherpoodle@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Sherry Dunn
10366 Bar Hill Rd Penn Valley, CA 95946-8953 sherpoodle@att.net

ESTERSON Sarah * ODOE

From: rdarsdupree@everyactioncustom.com on behalf of Ronald Du Pree <rdarsdupree@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Ronald Du Pree
83028 Davidson Rd Tygh Valley, OR 97063-9796 rdarsdupree@gmail.com

ESTERSON Sarah * ODOE

From: staydelott@everyactioncustom.com on behalf of Steve Aydelott <staydelott@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Steve Aydelott
20770 Gallop Rd Bend, OR 97701-8274
staydelott@hotmail.com

ESTERSON Sarah * ODOE

From: silverdoubloon@everyactioncustom.com on behalf of Cathy Elizabeth Levin <silverdoubloon@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:22 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
ms. Cathy Elizabeth Levin
14 Herrick Ct Apt 1 Bayonne, NJ 07002-3516 silverdoubloon@yahoo.com

ESTERSON Sarah * ODOE

From: teradoraellas@everyactioncustom.com on behalf of Tonya Rose <teradoraellas@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:23 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Miss Tonya Rose
5438 S State Route 49 Greenville, OH 45331-3317 teradoraellas@gmail.com

ESTERSON Sarah * ODOE

From: jvernonwoolley@everyactioncustom.com on behalf of John Woolley <jvernonwoolley@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:26 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr John Woolley
1606 E Sequim Bay Rd Sequim, WA 98382-7649 jvernonwoolley@gmail.com

ESTERSON Sarah * ODOE

From: brendakluhsman@everyactioncustom.com on behalf of Brenda Kluhsman <brendakluhsman@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:27 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Dr Brenda Kluhsman
343 S St Springfield, OR 97477-2224
brendakluhsman@gmail.com

ESTERSON Sarah * ODOE

From: jtboucher13@everyactioncustom.com on behalf of Justin Boucher <jtboucher13@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:27 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Justin Boucher
7135 SE 16th Ave Portland, OR 97202-5808 jtboucher13@yahoo.com

ESTERSON Sarah * ODOE

From: marisamcawthorne@everyactioncustom.com on behalf of marisa morales <marisamcawthorne@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:29 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms marisa morales
9122 E 53rd Ave Denver, CO 80238-3796
marisamcawthorne@gmail.com

ESTERSON Sarah * ODOE

From: junehog9@everyactioncustom.com on behalf of M.A.Kruse <junehog9@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:32 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Miss M.A. Kruse
424 NW Federal St Bend, OR 97703-3018
junehog9@gmail.com

ESTERSON Sarah * ODOE

From: junelynnjacobs@everyactioncustom.com on behalf of Lynn Jacobs McDonald <junelynnjacobs@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:42 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.
I feel it is most important to protect all birds, including our most precious raptors and symbols of our nation.

Sincerely,
Mrs. Lynn Jacobs McDonald
720 Grandview Dr Ashland, OR 97520-6604 junelynnjacobs@gmail.com

ESTERSON Sarah * ODOE

From: leland.block@everyactioncustom.com on behalf of Leland Block <leland.block@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:42 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Leland Block
3565 NE Mathison Pl Portland, OR 97212-2731 leland.block@comcast.net

ESTERSON Sarah * ODOE

From: jessica.jern@everyactioncustom.com on behalf of Jessica Jern <jessica.jern@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:46 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Jessica Jern
3660 Cheney Ln Wilson, WY 83014-9174
jessica.jern@gmail.com

ESTERSON Sarah * ODOE

From: tihuta@everyactioncustom.com on behalf of Kim Kuehnert <tihuta@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:51 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Kim Kuehnert
8712 N Decatur St Unit 505 Portland, OR 97203-5457 tihuta@msn.com

ESTERSON Sarah * ODOE

From: 7puffins@everyactioncustom.com on behalf of Susan Markowitz <7puffins@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:53 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Susan Markowitz
3775 Street Rd Doylestown, PA 18902
7puffins@gmail.com

ESTERSON Sarah * ODOE

From: kennethpable@everyactioncustom.com on behalf of Kenneth Able <kennethpable@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 7:56 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Dr. Kenneth Able
535 -000 Little Valley Rd Mcarthur, CA 96056-7633 kennethpable@gmail.com

ESTERSON Sarah * ODOE

From: sunseeker56@everyactioncustom.com on behalf of Susan Marsh <sunseeker56@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:02 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
ms Susan Marsh
44 Eagle Crest Dr Apt 8 Lake Oswego, OR 97035-1138 sunseeker56@hotmail.com

ESTERSON Sarah * ODOE

From: mholloway13@everyactioncustom.com on behalf of Marshall Holloway <mholloway13@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:10 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Marshall Holloway
20428 Dixie Ct Bend, OR 97702-8827
mholloway13@aol.com

ESTERSON Sarah * ODOE

From: ttedesco49@everyactioncustom.com on behalf of Terry Tedesco-Kerrick <ttedesco49@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:13 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Terry Tedesco-Kerrick
3042 E Squaw Peak Cir Phoenix, AZ 85016-8924 ttedesco49@cox.net

ESTERSON Sarah * ODOE

From: abigailspringer@everyactioncustom.com on behalf of Abby Hall <abigailspringer@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:18 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs Abby Hall
9301 SE 55th Ave Portland, OR 97222-4204 abigailspringer@gmail.com

ESTERSON Sarah * ODOE

From: paper.tigre@everyactioncustom.com on behalf of Danika Esden-Tempski <paper.tigre@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Danika Esden-Tempski
2909 Charnelton St Eugene, OR 97405-3228 paper.tigre@gmail.com

ESTERSON Sarah * ODOE

From: julesdubois84@everyactioncustom.com on behalf of Julie du Bois <julesdubois84@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:23 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Julie du Bois
8352 Starkland Ave Canoga Park, CA 91304-3049 julesdubois84@hotmail.com

ESTERSON Sarah * ODOE

From: maridelsol34@everyactioncustom.com on behalf of Mari Dominguez <maridelsol34@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:28 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs Mari Dominguez
7840 Gilmore Rd Linden, CA 95236-9419
maridelsol34@gmail.com

ESTERSON Sarah * ODOE

From: neveralone284@everyactioncustom.com on behalf of Brianne Foster <neveralone284@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:28 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
MS. Brianne Foster
848 Olympic Ave Medford, OR 97504-8477
neveralone284@gmail.com

ESTERSON Sarah * ODOE

From: lisarb77@everyactioncustom.com on behalf of Lisa Billings <lisarb77@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:29 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Lisa Billings
5510 SW Windsor Ct Portland, OR 97221-2151 lisarb77@hotmail.com

ESTERSON Sarah * ODOE

From: mika8171@everyactioncustom.com on behalf of Mika Gentili-Lloyd <mika8171@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:32 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Mika Gentili-Lloyd
1280 NE 63rd Way Unit 807 Hillsboro, OR 97124-6713 mika8171@yahoo.com

ESTERSON Sarah * ODOE

From: donmckelvey38@everyactioncustom.com on behalf of Don McKelvey <donmckelvey38@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:37 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

This is a no-brainer !

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Don McKelvey
2005 E 226th St Euclid, OH 44117-2107
donmckelvey38@gmail.com

ESTERSON Sarah * ODOE

From: lsbader@everyactioncustom.com on behalf of Sandra Bader <lsbader@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:40 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Sandra Bader
7938 S Alva Rd Harshaw, WI 54529-9633
lsbader@frontiernet.net

ESTERSON Sarah * ODOE

From: regula.hess@everyactioncustom.com on behalf of regula hess <regula.hess@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:51 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. regula hess
24 Rue De Ronquerolles Dixon, CA 95620
regula.hess@wanadoo.fr

ESTERSON Sarah * ODOE

From: yurtwoman@everyactioncustom.com on behalf of Mad Landis <yurtwoman@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:52 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Mad Landis
PO Box 6 Camp Sherman, OR 97730-0006
yurtwoman@mac.com

ESTERSON Sarah * ODOE

From: grammabarb01@everyactioncustom.com on behalf of Barbara Arlen <grammabarb01@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:55 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Barbara Arlen
5055 NE Elliott Cir Unit 76 Corvallis, OR 97330-9412 grammabarb01@comcast.net

ESTERSON Sarah * ODOE

From: foodtravelmyth@everyactioncustom.com on behalf of Monique Hall <foodtravelmyth@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:58 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Monique Hall
2244 Alder St Eugene, OR 97405-2944
foodtravelmyth@gmail.com

ESTERSON Sarah * ODOE

From: apsara51@everyactioncustom.com on behalf of Carla Ralston <apsara51@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 8:59 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Carla Ralston
7275 SW Canyon Ln Portland, OR 97225-3727 apsara51@yahoo.com

ESTERSON Sarah * ODOE

From: Livingstonjohn@everyactioncustom.com on behalf of John Livingston <Livingstonjohn@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 9:00 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. John Livingston
2378 Waldon St Redding, CA 96001-2621
Livingstonjohn@att.net

ESTERSON Sarah * ODOE

From: jloweat@everyactioncustom.com on behalf of Jacklyn J Lowe <jloweat@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 9:09 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Jacklyn J Lowe
4124 Vista Grande Dr San Diego, CA 92115-6817 jloweat@yahoo.com

ESTERSON Sarah * ODOE

From: bsjoerdsma1960@everyactioncustom.com on behalf of Bartha Sjoerdsma <bsjoerdsma1960@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 9:10 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Bartha Sjoerdsma
63 BIJENHOFSTRAAT Leeuwarden, AK 89220
bsjoerdsma1960@kpnmail.nl

ESTERSON Sarah * ODOE

From: misslissr@everyactioncustom.com on behalf of Melissa Rehder <misslissr@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 9:17 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Melissa Rehder
5630 SE Malden St Portland, OR 97206-9067 misslissr@yahoo.com

ESTERSON Sarah * ODOE

From: leslene@everyactioncustom.com on behalf of Leslene Dunn Dunn <leslene@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 9:18 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Leslene Dunn Dunn
Clarendon Cres Ochelata, OK 74051
leslene@lagroup.co.za

ESTERSON Sarah * ODOE

From: jstufflebeam@everyactioncustom.com on behalf of J Stufflebeam <jstufflebeam@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 9:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms J Stufflebeam
19178 S Echo Oregon City, OR 97045
jstufflebeam@gmail.com

ESTERSON Sarah * ODOE

From: killself5150@everyactioncustom.com on behalf of John Pasqua <killself5150@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 9:27 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. John Pasqua
843 S Escondido Blvd Escondido, CA 92025-5005 killself5150@yahoo.com

ESTERSON Sarah * ODOE

From: empathymail@everyactioncustom.com on behalf of Florinda Stroe <empathymail@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 9:38 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Florinda Stroe
1924 18th St Bellingham, WA 98225-8086
empathymail@yahoo.com

ESTERSON Sarah * ODOE

From: sweber3@everyactioncustom.com on behalf of Sandra Weber <sweber3@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 9:41 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Sandra Weber
1213 Hidden Ridge Rd Toledo, OH 43615-6724 sweber3@bex.net

ESTERSON Sarah * ODOE

From: nellie.jan@everyactioncustom.com on behalf of Jan Nelson <nellie.jan@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 9:44 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
ms Jan Nelson
85354 Doane Rd Eugene, OR 97402-8204
nellie.jan@gmail.com

ESTERSON Sarah * ODOE

From: rsscpa@everyactioncustom.com on behalf of Rob Seltzer <rsscpa@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 10:00 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Rob Seltzer
18408 Clifftop Way Malibu, CA 90265-5630 rsscpa@earthlink.net

ESTERSON Sarah * ODOE

From: malbert@everyactioncustom.com on behalf of Martin Albert <malbert@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 10:12 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Dr. Martin Albert
2040 Ashland Mine Rd Ashland, OR 97520-9115 malbert@cstone.net

ESTERSON Sarah * ODOE

From: lcardiff@everyactioncustom.com on behalf of Lynn Cardiff <lcardiff@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 10:31 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
MS Lynn Cardiff
No No Salem, OR 97301
lcardiff@comcast.net

ESTERSON Sarah * ODOE

From: cmvalastro@everyactioncustom.com on behalf of Cecile Valastro <cmvalastro@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 10:33 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Cecile Valastro
23804 SW Golden Pond Ter Sherwood, OR 97140-6222 cmvalastro@hotmail.com

ESTERSON Sarah * ODOE

From: Pegehring722@everyactioncustom.com on behalf of Patricia Gehring <Pegehring722@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 10:36 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Patricia Gehring
3040 Central Ave Apt C104 Billings, MT 59102-6684 Pegehring722@gmail.com

ESTERSON Sarah * ODOE

From: lcardiff@everyactioncustom.com on behalf of Lynn Cardiff <lcardiff@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 10:40 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Lynn Cardiff
No NO Salem, OR 97301
lcardiff@comcast.net

ESTERSON Sarah * ODOE

From: tammers.jammers@everyactioncustom.com on behalf of Tammy Bittler <tammers.jammers@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 10:42 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Tammy Bittler
4424 SE Crystal Springs Blvd Portland, OR 97206-0940 tammers.jammers@gmail.com

ESTERSON Sarah * ODOE

From: michelehaudebourg@everyactioncustom.com on behalf of Michele Haudebourg <michelehaudebourg@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 10:44 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs Michele Haudebourg
6 Rue De Belfort Huntsville, TX 77340
michelehaudebourg@sfr.fr

ESTERSON Sarah * ODOE

From: k.a.mcgee@everyactioncustom.com on behalf of Kristin McGee <k.a.mcgee@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 10:58 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Dr. Kristin McGee
2453 Crestmont Cir S Salem, OR 97302-3669 k.a.mcgee@rug.nl

ESTERSON Sarah * ODOE

From: anemec@everyactioncustom.com on behalf of Andrew Nemec <anemec@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 11:11 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Andrew Nemec
4419 SE Henderson St Portland, OR 97206-8433 anemec@outlook.com

ESTERSON Sarah * ODOE

From: Joycehergenrader@everyactioncustom.com on behalf of Joyce Hergenrader <Joycehergenrader@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 11:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Joyce Hergenrader
20565 SW Cheshire Ct Aloha, OR 97078-3737 Joycehergenrader@hotmail.com

ESTERSON Sarah * ODOE

From: michellehmackenzie@everyactioncustom.com on behalf of Michelle MacKenzie <michellehmackenzie@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 11:30 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Michelle MacKenzie
980 Berkeley Ave Menlo Park, CA 94025-2331 michellehmackenzie@gmail.com

ESTERSON Sarah * ODOE

From: silvia.bertano@everyactioncustom.com on behalf of Silvia Bertano <silvia.bertano@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 11:38 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Silvia Bertano
Corso Rosselli 12 3/8 Tyrone, NY 10129
silvia.bertano@comune.torino.it

ESTERSON Sarah * ODOE

From: n8wilson1@everyactioncustom.com on behalf of Nathan Wilson <n8wilson1@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 11:46 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Nathan Wilson
9923 Parkland Dr Twinsburg, OH 44087-3317 n8wilson1@gmail.com

ESTERSON Sarah * ODOE

From: drmatt@everyactioncustom.com on behalf of Matt Freedman <drmatt@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 11:46 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Dr. Matt Freedman
85343 N Hideaway Hills Rd Eugene, OR 97405-9013 drmatt@yahoo.com

ESTERSON Sarah * ODOE

From: laursfars@everyactioncustom.com on behalf of Laura Farah <laursfars@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 6:59 PM
To: MAY Luke * ODOE
Subject: Protect Eagles in the The Gorge

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

My name is Laura Farah, I work at the Cascades Raptor Center in Eugene, Oregon. As someone who cares deeply about predators and works 40+ hours a week training raptors, providing community education about them, and doing raptor rehabilitation, I am highly concerned with the Summit Ridge's request for another deadline extension for construction in the Columbia River Gorge and Deschutes Canyon.

It is irresponsible for Summit Ridge to try and push forward with construction after sitting inactive on their plans for nearly a decade. The data taken from surveying the land and wildlife is now outdated and therefore not valid to approve their construction plans.

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Laura Farah
1878 Lawrence St Eugene, OR 97401-3873

laursfars@gmail.com

ESTERSON Sarah * ODOE

From: Barbara Traver <btraver@gmail.com>
Sent: Sunday, February 17, 2019 11:02 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Barbara Traver
3740 SE Washington St.
Portland, OR 97214

February 18, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Barbara Traver

ESTERSON Sarah * ODOE

From: Annie Ray <2annieray@gmail.com>
Sent: Sunday, February 17, 2019 9:32 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Annie Ray
5806 SE Rhone St
Portland, OR 97206

February 18, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Annie Ray

ESTERSON Sarah * ODOE

From: Karen Ireland <kipath@aol.com>
Sent: Sunday, February 17, 2019 8:22 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Karen Ireland
6001 Douglas Drive
Yakima, WA 98908

February 17, 2019

Dear Chair Beyeler and Members of the Council,

As a bird lover I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Karen Ireland

ESTERSON Sarah * ODOE

From: Dawn Rasmussen <dawn@pathfindercareers.com>
Sent: Sunday, February 17, 2019 6:52 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Dawn Rasmussen
1335 Oak Hill Drive
The Dalles, OR 97058

February 17, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Dawn Rasmussen

ESTERSON Sarah * ODOE

From: Paula Jack-Fix <pjackfix@comcast.net>
Sent: Sunday, February 17, 2019 6:32 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Paula Jack-Fix
11503 SW Streamside Ct
Portland, OR 97219

February 17, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Paula Jack-Fix

ESTERSON Sarah * ODOE

From: Ero Gray <erogray@gmail.com>
Sent: Sunday, February 17, 2019 5:52 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Ero Gray
3719 SE Market St
Portland, OR 97214

February 17, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Ero Gray

ESTERSON Sarah * ODOE

From: Diane Craig <creativekiwi@comcast.net>
Sent: Sunday, February 17, 2019 4:02 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Diane Craig
8525 SW Davies Rd
Beaverton, OR 97008

February 17, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Diane Craig

ESTERSON Sarah * ODOE

From: JL Angell <jangell@earthlink.net>
Sent: Sunday, February 17, 2019 1:02 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

JL Angell
2388 Ponderosa Rd
Rescue, CA 95672

February 17, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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Sincerely,
JL Angell

ESTERSON Sarah * ODOE

From: Patricia Mizutani <pmizutan@yahoo.com>
Sent: Sunday, February 17, 2019 12:32 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Patricia Mizutani
2335 NE 24th Ave
Portland, OR 97212

February 17, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Patricia Mizutani

ESTERSON Sarah * ODOE

From: Delores Porch <verandafay@gmail.com>
Sent: Sunday, February 17, 2019 8:51 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Delores Porch
1212 34th Ave SE #63
Albany, OR 97322

February 17, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Delores Porch

ESTERSON Sarah * ODOE

From: Anne Clark <annemusic2@yahoo.com>
Sent: Saturday, February 16, 2019 9:51 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Anne Clark
3221 NE schuyler st.
portland, OR 97212

February 17, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Anne Clark

ESTERSON Sarah * ODOE

From: Wayne&Carolyn Stewart <candwstewart@q.com>
Sent: Saturday, February 16, 2019 8:31 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Wayne&Carolyn Stewart
515 SW Cheltenham St
pou, OR 97239

February 16, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Wayne&Carolyn Stewart

ESTERSON Sarah * ODOE

From: Lee Siebert <clsiebert@comcast.net>
Sent: Saturday, February 16, 2019 7:30 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Lee Siebert
1523 SW Miller Ct
Gresham, OR 97080

February 16, 2019

Dear Chair Beyeler and Members of the Council,

As an Oregon resident who visits the Deshcutes River area, I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Lee Siebert

ESTERSON Sarah * ODOE

From: Rhett Lawrence <rhettlawrence@yahoo.com>
Sent: Saturday, February 16, 2019 6:10 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Rhett Lawrence
6445 N Commercial Ave
Portland, OR 97217

February 16, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Rhett Lawrence

ESTERSON Sarah * ODOE

From: Susan Geer <susanmgeer@gmail.com>
Sent: Saturday, February 16, 2019 5:30 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Susan Geer
906 Penn Ave
La Grande, OR 97850

February 16, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Susan Geer

ESTERSON Sarah * ODOE

From: Sammy Low <cougarcreek7@gmail.com>
Sent: Saturday, February 16, 2019 5:20 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Sammy Low
20420 Marine Dr, Apt P2
Stanwood, WA 98292

February 16, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Sammy Low

ESTERSON Sarah * ODOE

From: Heather Stanhope <h.stanhope@gmail.com>
Sent: Saturday, February 16, 2019 4:50 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Heather Stanhope
67771 Hunter Rd
Summerville, OR 97876

February 16, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time!!!

It has been more than 9 yrs since the preliminary application was filed, and more than 7 yrs since the project was originally approved. If Summit Ridge were a viable, worthwhile project, it seems like construction would have been started years ago. Yet Pattern Energy admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous extensions.

I am especially concerned for the livability of our communities & access to unspoiled areas for outdoor recreation. The raptor survey data for this project is seriously dated. It has been 8+ years since the project site was last surveyed for bald and golden eagles, and 3-4 yrs for other raptors. The US Fish & Wildlife Service has expressed serious concerns about this project's impacts and recommended a 6-mile buffer between turbine sites and all eagle nests.

Pattern Energy is now asking the EFSC to extend the construction deadlines again, but has failed to perform/disclose any updated surveys. It is impossible for the EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-- such as radar technology for curtailing operations during migratory periods-- has changed substantially in the years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension seems inappropriate at this time and should be denied.

In addition, it is believed that Pattern Energy submitted this request for yet another extension under invalid rules. These rules are being challenged by 9 conservation organizations in the Oregon Supreme Court.

Finally, Pattern Energy waited until 3 days before the deadline to submit its application and has failed to state a good cause for its delay. (Even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments, those rules required Pattern to submit its application at least 6 months before the construction start deadline.)

I implore that you deny the requested 3rd extension of the construction deadlines. If Pattern Energy still desires to move forward with this **controversial** project, it should be required to file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Heather Stanhope (02.16.2019)

ESTERSON Sarah * ODOE

From: Bill Kirkland <bkirkland503@gmail.com>
Sent: Saturday, February 16, 2019 4:40 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Bill Kirkland
4050 SW Bancroft St.
Portland, OR 97221

February 16, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Dr. Bill Kirkland

ESTERSON Sarah * ODOE

From: Sue Kelso-Haines <skelso9314@aol.com>
Sent: Monday, February 18, 2019 10:29 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Sue Kelso-Haines
2685 Swyers Drive
Hood River, OR 97031

February 18, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Sue Kelso-Haines

ESTERSON Sarah * ODOE

From: Eileen Sleva <otter1128@gmail.com>
Sent: Tuesday, February 19, 2019 4:49 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Eileen Sleva
5680 SE Pine Street
Hillsboro, OR 97123

February 19, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Eileen Sleva

ESTERSON Sarah * ODOE

From: Linda Browning <lembrowning5@gmail.com>
Sent: Tuesday, February 19, 2019 7:29 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Linda Browning
7855 SW Matheny Dr
Beaverton, OR 97008

February 19, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Linda Browning

ESTERSON Sarah * ODOE

From: Ellen Donoghue <edonoghue2424@gmail.com>
Sent: Tuesday, February 19, 2019 9:20 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Ellen Donoghue
1592 Carroll R
Mosier, OR 97040

February 19, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Bald eagles, golden eagles, and other wildlife are beings that share our planet. Tremendous effort on the part of scientists, land managers, citizens, and volunteer groups are the REASON for the return of bald eagles in the US. We must not slip backwards in our progression as humans who aspire to co-exist with others on this planet, all beings.

The amount of energy that can be saved through energy conservation measures and educations is tremendous. We must not live from a fear-based existence that are fueled by greed and ego. We can live a sustainable life on this planet. It is possible. It just means waking up from a trance of disconnected, unworthiness, and self-centered action. We are ALL on this ship together.
Thank you for using logic and reason and making the correct decision to deny this extension!
Ellen Donoghue, PhD

Sincerely,
Ellen Donoghue, PhD

ESTERSON Sarah * ODOE

From: Jana Fussell <Janafussell@gmail.com>
Sent: Tuesday, February 19, 2019 11:40 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Jana Fussell
924 Cumberland Road
Lake Oswego, OR 97034

February 19, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Jana Fussell

ESTERSON Sarah * ODOE

From: Michael Wolf <mchlwlf@lycos.com>
Sent: Tuesday, February 19, 2019 4:08 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Michael Wolf
3126 NE 7th Ave.
Portland, OR 97212

February 19, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Michael Wolf

ESTERSON Sarah * ODOE

From: HM MM <millardhm@gmail.com>
Sent: Tuesday, February 19, 2019 5:59 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

HM MM
P. O. Box 2786
Salem, OR 97308

February 19, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

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Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
HM MM

ESTERSON Sarah * ODOE

From: Bill Gardner <bgard95942@att.net>
Sent: Wednesday, February 20, 2019 9:22 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Bill Gardner
PO Box 216
Forest Ranch, CA 95942

February 20, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

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Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Bill Gardner

ESTERSON Sarah * ODOE

From: Carolyn Williams <carolyn76@gmail.com>
Sent: Monday, February 18, 2019 9:28 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Carolyn Williams
3322 NE 127th Ave
Portland, OR 97230

February 18, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Carolyn Williams

ESTERSON Sarah * ODOE

From: alex@everyactioncustom.com on behalf of Alex Prentiss <alex@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 3:40 PM
To: MAY Luke * ODOE
Subject: Reconsider Outdated Summit Ridge Wind Farm Application to Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Alex Prentiss
15685 SW 116th Ave King City, OR 97224-2651 alex@imcclains.com

ESTERSON Sarah * ODOE

From: dns@everyactioncustom.com on behalf of David Stone <dns@everyactioncustom.com>
Sent: Tuesday, February 19, 2019 12:46 PM
To: MAY Luke * ODOE
Subject: Reject extension of outdated wind power project that would harm Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr David Stone
2255 Hideaway Ct Eugene, OR 97401-5105
dns@efn.org

ESTERSON Sarah * ODOE

From: seacliff4@everyactioncustom.com on behalf of Barrett Edgar <seacliff4@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 10:12 AM
To: MAY Luke * ODOE
Subject: Update the EIS!!!Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr Barrett Edgar
PO Box 210 Wedderburn, OR 97491-0210
seacliff4@gmail.com

From: Howlingwithwolves@everyactioncustom.com on behalf of Jeanette Holmgren <Howlingwithwolves@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 12:18 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Jeanette Holmgren
Strömsegatan 23A 23A Boden, AL 96167
Howlingwithwolves@gmail.com

From: isabellacer@everyactioncustom.com on behalf of ISABEL CERVERA <isabellacer@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 12:29 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. ISABEL CERVERA
2118 S Main St Salisbury, NC 28147-1300 isabellacer@hotmail.com

From: brigitte.vb.1060@everyactioncustom.com on behalf of brigitte vanbekbergen <brigitte.vb.1060@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 12:33 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Miss brigitte vanbekbergen
RUE DE Lhôtel DES MONNAIES 54 SAINT-GILL Bruxelles, AK 10600
brigitte.vb.1060@gmail.com

From: tabbykat728@everyactioncustom.com on behalf of Raleigh koritz <tabbykat728@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 12:35 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Raleigh koritz
4505 Nathan Ln N Minneapolis, MN 55442-3153 tabbykat728@q.com

From: jeannaples7@everyactioncustom.com on behalf of Jean Naples <jeannaples7@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 1:59 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts.

At this time, I am strongly urging that until the raptor survey data for this project has been updated to include actual real-time counts for bald and golden eagles, I would completely deny the requested third extension of time to initiate construction.

Thank you for your consideration of my letter and request.

Sincerely,
Dr. Jean Naples
26 Montebello Commons Dr Suffern, NY 10901-4250 jeannaples7@gmail.com

From: christallklar@everyactioncustom.com on behalf of Chris Hastings <christallklar@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 2:40 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Chris Hastings
8102 Ralston Rd Arvada, CO 80002-2440
christallklar@hotmail.com

From: pbruci@everyactioncustom.com on behalf of Peggy Chambers <pbruci@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 3:18 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs Peggy Chambers
70435 Canterbury Dr Richmond, MI 48062-1083 pbruci@comcast.net

From: sinnamon_spider13@everyactioncustom.com on behalf of Jerily Rushworth <sinnamon_spider13@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 3:25 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Miss Jerily Rushworth
1038 Florence Ave Colorado Springs, CO 80905-3509 sinnamon_spider13@yahoo.com

From: sija1810@everyactioncustom.com on behalf of Sija Sur <sija1810@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 3:31 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Miss Sija Sur
26 ZAGREB Zagreb, AK 10000
sija1810@gmail.com

From: barryfbaudains@everyactioncustom.com on behalf of Barry Frederick Baudains <barryfbaudains@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 4:01 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Barry Frederick Baudains
VINCENT Ct Schenectady, NY 12345-0001
barryfbaudains@gmail.com

From: Animalsrock1178@everyactioncustom.com on behalf of Petra Stadtmueller <Animalsrock1178@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 4:05 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Petra Stadtmueller
6 BUERGERSTRASSE Erlensee, AE 67808
Animalsrock1178@gmail.com

From: bocacatlover@everyactioncustom.com on behalf of Janet Robinson <bocacatlover@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 4:23 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Janet Robinson
6391 Toulon Dr Boca Raton, FL 33433-3801 bocacatlover@gmail.com

From: gregesteve@everyactioncustom.com on behalf of Gregory Esteve <gregesteve@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 4:29 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Gregory Esteve
3655 N Scenic Hwy Lake Wales, FL 33898-6608 gregesteve@outlook.com

From: sunkat74@everyactioncustom.com on behalf of Kat Howren <sunkat74@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 4:45 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Kat Howren
25050 Sandhill Blvd Punta Gorda, FL 33983-5979 sunkat74@gmail.com

From: edm_austin@everyactioncustom.com on behalf of David Michalek <edm_austin@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 4:51 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Chair Beyeler and Members of the Council:

The the wind projects out of the Gorge.

Deny Pattern's request to extend the deadlines a third time. They must get a new EIS.

Sincerely,
Mr. David Michalek
25 Eugene St Hood River, OR 97031-2215
edm_austin@yahoo.com

From: pablomartinbobe@everyactioncustom.com on behalf of Pablo Bobe <pablomartinbobe@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 4:53 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Pablo Bobe
1 Main St New York, NY 10044-0052
pablomartinbobe@hotmail.com

From: mason_dawn@everyactioncustom.com on behalf of Dawn Mason <mason_dawn@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 5:45 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Dawn Mason
1547 W Market St Pottsville, PA 17901-2222 mason_dawn@comcast.net

From: oldcolleen@everyactioncustom.com on behalf of Colleen McCaffrey <oldcolleen@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 6:32 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Colleen McCaffrey
1261 Crenshaw Rd Eugene, OR 97401-2002
oldcolleen@gmail.com

From: sstodd@everyactioncustom.com on behalf of Sara Todd <sstodd@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 6:37 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Sara Todd
34065 Wood Duck Ave Nehalem, OR 97131-9760 sstodd@gmail.com

From: iamblessed619@everyactioncustom.com on behalf of E W <iamblessed619@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 6:41 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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Sincerely,
dr E W
PO Box 21 Farmington, CT 06034-0021
iamblessed619@gmail.com

From: Bellasmom13@everyactioncustom.com on behalf of Lissa Michaeli <Bellasmom13@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 6:53 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Lissa Michaeli
22812 NE 101st Cir Vancouver, WA 98682-9509 Bellasmom13@gmail.com

From: arjenstefanie@everyactioncustom.com on behalf of Arjen Hoekstra <arjenstefanie@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 6:53 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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Sincerely,
Mr. Arjen Hoekstra
VAN BUREN St Eugene, OR 97405
arjenstefanie@yahoo.com

From: astridkeup@everyactioncustom.com on behalf of Astrid Keup <astridkeup@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 6:56 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs Astrid Keup
5 Loehrbachsgraben Alexander, KS 35469
astridkeup@mac.com

From: ellpfa@everyactioncustom.com on behalf of Ellen Pfander <ellpfa@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:01 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Ellen Pfander
83435 Tolman Rd Creswell, OR 97426-9708 ellpfa@gmail.com

From: embroideread@everyactioncustom.com on behalf of Donna Tanner <embroideread@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:06 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Donna Tanner
3 Grove St Concord, MA 01742-1519
embroideread@aol.com

From: shrnwiebe@everyactioncustom.com on behalf of Sharon Wiebe WIEBE <shrnwiebe@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:17 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Sharon Wiebe WIEBE
8401 Spain Rd NE Apt 33H Albuquerque, NM 87111-2079 shrnwiebe@netzero.net

From: kekinsley@everyactioncustom.com on behalf of Kay Kinsley <kekinsley@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:23 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Kay Kinsley
1657 Goldcrest Ave NW Salem, OR 97304-2030 kekinsley@comcast.net

From: giant.trees@everyactioncustom.com on behalf of Mahogany Aulenbach <giant.trees@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:24 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Mahogany Aulenbach
25358 Cherry Creek Rd Monroe, OR 97456-9490 giant.trees@yahoo.com

From: gailandoz@everyactioncustom.com on behalf of Richard Osmun <gailandoz@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:25 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
mr Richard Osmun
2726 NW Valley St Camas, WA 98607-9320
gailandoz@hotmail.com

From: milrsangl@everyactioncustom.com on behalf of Tamara Miller <milrsangl@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:53 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Tamara Miller
335 Manning Ln Hampton, VA 23666-5024
milrsangl@aol.com

From: ziglerugn@everyactioncustom.com on behalf of Catherine Edwards <ziglerugn@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 8:01 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Catherine Edwards
1920 Tyler Creek Rd Ashland, OR 97520-9790 ziglerugn@aol.com

From: ruthgriffiths1@everyactioncustom.com on behalf of Ruth Griffiths <ruthgriffiths1@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 8:16 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
mrs Ruth Griffiths
1520 Belmont Ave Schenectady, NY 12308-2102 ruthgriffiths1@yahoo.co.uk

From: hope4daisies@everyactioncustom.com on behalf of Christeen Anderson <hope4daisies@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 8:28 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Christeen Anderson
4609 Top Flight Dr Crestview, FL 32539-5710 hope4daisies@gmail.com

From: lylecaroleklumb@everyactioncustom.com on behalf of Carole Klumb <lylecaroleklumb@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 8:39 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Carole Klumb
W370S9784 State Road 67 Eagle, WI 53119-1555 lylecaroleklumb@centurytel.net

From: lisajunior@everyactioncustom.com on behalf of Lisa Salazar <lisajunior@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 8:39 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Lisa Salazar
PO Box 5795 Shasta Lake, CA 96089-5795
lisajunior@att.net

From: susancroissant269@everyactioncustom.com on behalf of Susan Croissant <susancroissant269@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 8:42 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Susan Croissant
607 E Main St Apt F Cottage Grove, OR 97424-2061 susancroissant269@gmail.com

From: kayucian@everyactioncustom.com on behalf of Erin Barca <kayucian@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 8:47 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Erin Barca
628 Promontory Ter # 429 San Ramon, CA 94583-1562 kayucian@gmail.com

From: pearpeople@everyactioncustom.com on behalf of Larry Martin <pearpeople@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 9:03 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr Larry Martin
899 Frankton Rd Hood River, OR 97031-8740 pearpeople@gmail.com

From: herberjw@everyactioncustom.com on behalf of John Herberg <herberjw@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 9:06 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. The construction deadlines for this project have already been extended twice. Yet the developer (Pattern Development) is still requesting another extension? I urge EFSC to deny Pattern's request to extend the deadlines for the 3rd time. Twice is enough.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. John Herberg
677 1/2 W 23rd Ave Eugene, OR 97405-2578 herberjw@yahoo.com

From: orhorse1@everyactioncustom.com on behalf of Rebecca Hollenbeck <orhorse1@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 9:12 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Rebecca Hollenbeck
27731 SW Baker Rd Sherwood, OR 97140-8409 orhorse1@yahoo.com

From: bgparadise@everyactioncustom.com on behalf of Brian Paradise <bgparadise@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 9:34 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Brian Paradise
13 Arbor Club Dr Unit 315 Ponte Vedra Beach, FL 32082-2615 bgparadise@comcast.net

From: dmaried@everyactioncustom.com on behalf of Diane Daiute <dmaried@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 9:43 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I've never ever liked wind power for this reason - it kills birds and bats. The infrastructure is huge and unwieldy. I think it's a stupid idea.
I like solar better. SO I say NO WIND FARMS period.... anywhere ever.

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Diane Daiute
1370 Evergreen Ln Sweet Home, OR 97386-1303 dmaried@protonmail.com

From: kohanley@everyactioncustom.com on behalf of Kelly Ohanley <kohanley@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 9:44 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Dr. Kelly Ohanley
6134 NE Alameda St Portland, OR 97213-4056 kohanley@gmail.com

From: Psgallant2009@everyactioncustom.com on behalf of Sherri Gallant <Psgallant2009@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 9:45 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Sherri Gallant
10426 6th Ave SW Seattle, WA 98146-1522 Psgallant2009@gmail.com

From: wendyjane25@everyactioncustom.com on behalf of Wendy Forster <wendyjane25@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 9:45 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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Sincerely,
Mrs. Wendy Forster
S FARM GRANARY Schenectady, NY 12345-0001 wendyjane25@sky.com

From: jeannine@everyactioncustom.com on behalf of Jeannine Florance <jeannine@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 9:50 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Jeannine Florance
1116 NW Federal St Bend, OR 97703-2339
jeannine@lifestorymoments.com

From: maryann_62@everyactioncustom.com on behalf of Maryann Smale <maryann_62@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 10:22 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Miss Maryann Smale
37 Dyers Bay Rd Steuben, ME 04680-3110
maryann_62@live.com

From: merrick@everyactioncustom.com on behalf of Nancy Merrick <merrick@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 10:33 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Nancy Merrick
3012 NE Lansing Ct Bend, OR 97701-8172
merrick@bendcable.com

From: geoffaking@everyactioncustom.com on behalf of Geoff King <geoffaking@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 10:36 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. Geoff King
4318 SE Taggart St Portland, OR 97206-1650 geoffaking@gmail.com

From: thimbleberry@everyactioncustom.com on behalf of Peter Ryan <thimbleberry@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 11:01 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. Peter Ryan
96078 Dean Mountain Rd North Bend, OR 97459-7584 thimbleberry@jeffnet.org

From: tnt1014@everyactioncustom.com on behalf of Peggy Tribble <tnt1014@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 11:22 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Peggy Tribble
48100 SE Tumala Mountain Rd Estacada, OR 97023-9551 tnt1014@aol.com

From: brokerbob45@everyactioncustom.com on behalf of Bob Karcich <brokerbob45@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 11:26 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. Bob Karcich
112 Genessee St Medford, OR 97504-7104
brokerbob45@yahoo.com

From: Skyearthcatdog@everyactioncustom.com on behalf of Joann Fechner <Skyearthcatdog@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 11:27 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Joann Fechner
4901 Wailapa Rd Kilauea, HI 96754-5543
Skyearthcatdog@yahoo.com

From: [redacted]cwashington@everyactioncustom.com on behalf of Chris Washington <cwashington@everyactioncustom.com>
Sent: [redacted]Wednesday, February 20, 2019 11:37 AM
To: [redacted]MAY Luke * ODOE
Subject: [redacted]Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Chris Washington
345 W 58th St Apt 11U New York, NY 10019-1140 cwashington@wlrk.com

From: Nickcharles60@everyactioncustom.com on behalf of Nicholas Chatfield <Nickcharles60@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 11:44 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Nicholas Chatfield
7 CAREY Rd Virginia Beach, VA 23456
Nickcharles60@gmail.com

From: katecassidy39@everyactioncustom.com on behalf of kate cassidy <katecassidy39@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 11:55 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. kate cassidy
Clapham Loudon, TN 37765
katecassidy39@googlemail.com

From: jmillerent@everyactioncustom.com on behalf of James Miller <jmillerent@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 11:57 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. James Miller
6140 SW Canby St Portland, OR 97219-1145 jmillerent@msn.com

From: [redacted]Pirwit53@everyactioncustom.com on behalf of Arry Pirwitz <Pirwit53@everyactioncustom.com>
Sent: [redacted]Wednesday, February 20, 2019 12:01 PM
To: [redacted]MAY Luke * ODOE
Subject: [redacted]Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
mr Arry Pirwitz
107 NE Fremont St Apt B Portland, OR 97212-2079 Pirwit53@gmail.com

From: chelseasf@everyactioncustom.com on behalf of Chelsea Hernandez <chelseasf@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 12:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Miss Chelsea Hernandez
1115 B St San Rafael, CA 94901-2908
chelseasf@gmail.com

From: kareng@everyactioncustom.com on behalf of Karen Griswold <kareng@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 12:50 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Karen Griswold
6575 NW Mountain Laurel Pl Corvallis, OR 97330-9759 kareng@peak.org

From: cat-hen@everyactioncustom.com on behalf of Henry Garrison <cat-hen@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 1:00 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Dr. Henry Garrison
2204 NE 21st Ave Portland, OR 97212-4622 cat-hen@comcast.net

From: jmabwalker@everyactioncustom.com on behalf of Joan Walker <jmabwalker@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 1:11 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Joan Walker
2815 Sierra Vista Way Bishop, CA 93514-3035 jmabwalker@verizon.net

From: tpalacky@everyactioncustom.com on behalf of Tami Palacky <tpalacky@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 1:11 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Miss Tami Palacky
8005 Bethelen Woods Ln Springfield, VA 22153-2021 tpalacky@gmail.com

From: loisy1@everyactioncustom.com on behalf of Lois Yuen <loisy1@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 12:14 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Lois Yuen
1940 Yosemite Rd Berkeley, CA 94707-1651 loisy1@gmail.com

From: Bill Gardner
Sent: Wednesday, February 20, 2019 9:22 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Bill Gardner
PO Box 216
Forest Ranch, CA 95942

February 20, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Bill Gardner

Oregon Energy Facility Siting Council
c/o Luke May, Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301
luke.may@oregon.gov

RECEIVED
FEB 11 2019
DEPARTMENT OF ENERGY

Re: Summit Ridge Wind Farm – Request for Amendme

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Susan Pinson
826 SE Morgan Rd
Vancouver, WA 98664

MAY Luke * ODOE

From: Energy Siting * ODOE
Sent: Wednesday, February 20, 2019 11:33 AM
To: MAY Luke * ODOE
Subject: FW: Summit Ridge Wind Turbines

From: Mavis Kvernvik [mailto:thekvernviks@gmail.com]
Sent: Tuesday, February 19, 2019 12:13 PM
To: Energy Siting * ODOE <Energy.Siting@oregon.gov>
Subject: Summit Ridge Wind Turbines

I understand that the owner of this site has asked to build the wind turbines. This is
ten years after first applying. The turbines are 500' high and consideration should be given
to reapplying. After ten years, more information has been learned about their
impact on eagles, etc. and further study is needed. Thank you.

--
Mavis Kvernvik
Netarts and Portland, Oregon

Virus-free. www.avast.com

MAY Luke * ODOE

From: JoAnn Marlette <mly.jkm5@gmail.com>
Sent: Wednesday, February 20, 2019 1:18 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

JoAnn Marlette
2031 Court Street #8
Baker City, OR 97814

February 20, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

The Summit Ridge Wind Farm in Wasco County was first applied for more than nine (9) years ago, but has not been built. The project threatens impacts to raptors, including, bald and golden eagles, as well as other birds and wildlife. Moreover, the raptor survey for this project hasn't been updated, and, the old site survey showed extensive damage to raptors, birds and other wildlife. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests.

In addition, the project would harm views along the lower Deschutes River and the Columbia River Gorge National Scenic Area. The wind turbines would loom over the horizon from multiple vantage points along the Deschutes River, forever changing the recreational experience along the Lower Deschutes Wild & Scenic River.

As we are all aware, Pattern Energy submitted this request for a third (3rd) extension under invalid rules. The rules are invalid for a number of reasons, including, but not limited to, the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Additionally, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. In this case, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. I respectfully request that Pattern's solicited third extension be denied.

Sincerely,
JoAnn Marlette

From: seacliff4@everyactioncustom.com on behalf of Barrett Edgar <seacliff4@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 10:12 AM
To: MAY Luke * ODOE
Subject: Update the EIS!!!Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr Barrett Edgar
PO Box 210 Wedderburn, OR 97491-0210
seacliff4@gmail.com

From: phil@everyactioncustom.com on behalf of Philip Randall <phil@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 1:35 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Philip Randall
27 NW Mueller Ave Bend, OR 97703-2525
phil@tiedyed.us

From: info@everyactioncustom.com on behalf of Eve Saglietto <info@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 1:36 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Eve Saglietto
Erlenweg Newcastle, UT 84756
info@saglietto.de

From: sallyjstevens@everyactioncustom.com on behalf of Sally Stevens <sallyjstevens@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 2:06 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Sally Stevens
9935 SE Grant Ct Portland, OR 97216-2643 sallyjstevens@yahoo.com

From: pinwil4634@everyactioncustom.com on behalf of Luan Pinson <pinwil4634@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 2:12 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Luan Pinson
826 SE Morgan Rd Vancouver, WA 98664-1762 pinwil4634@gmail.com

From: scott0547@everyactioncustom.com on behalf of J.David Scott <scott0547@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 2:14 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr J. David Scott
9 Ailsa Pl Unit 48 Cottage Grove, OR 97424 scott0547@rogers.com

From: slveviator@everyactioncustom.com on behalf of Flavia Pellizzari <slveviator@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 2:14 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Flavia Pellizzari
505 Towerst Crystal Lake, IL 60012
slveviator@hotmail.com

From: janine.vinton@everyactioncustom.com on behalf of Janine Vinton <janine.vinton@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 2:37 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mrs. Janine Vinton
1 Walter St Albany, NY 12204-1604
janine.vinton@mail.com

From: lhbernard@everyactioncustom.com on behalf of Lois Bernard <lhbernard@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 2:52 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Lois Bernard
3124 Salishan Ct Medford, OR 97504-5718 lhbernard@gmail.com

From: mtnclimber14er@everyactioncustom.com on behalf of Sherry Palmer <mtnclimber14er@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 3:01 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs Sherry Palmer
1592 Skye Pkwy West Linn, OR 97068-1806 mtnclimber14er@yahoo.com

From: pheralicious@everyactioncustom.com on behalf of Judith Hazelton <pheralicious@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 3:07 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Judith Hazelton
1617 US Route 7 S Bennington, VT 05201-9384 pheralicious@yahoo.com

From: brigmariaevans@everyactioncustom.com on behalf of Brigitte Maria Evans <brigmariaevans@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 1:27 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Brigitte Maria Evans
831 W 14th St Front Royal, VA 22630-2917 brigmariaevans@gmail.com

From: peachie104@everyactioncustom.com on behalf of sau tsang <peachie104@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 3:45 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
ms sau tsang
10486 Glenna Lodge St Las Vegas, NV 89141-8577 peachie104@gmail.com

From: yniar@everyactioncustom.com on behalf of Rainy Miatke <yniar@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 3:54 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Rainy Miatke
15097 Highway 66 Ashland, OR 97520-9400 yniar@startmail.com

From: satyavayu@everyactioncustom.com on behalf of Satya Vayu <satyavayu@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 4:00 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ven. Satya Vayu
6608 SE 81st Ave Portland, OR 97206-7133 satyavayu@gmail.com

From: ckellis@everyactioncustom.com on behalf of C.K.Ellis <ckellis@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 4:36 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. C.K. Ellis
2784 NE 9th Dr Hillsboro, OR 97124-1354 ckellis@rainy-day-games.com

From: mazda63@everyactioncustom.com on behalf of jules moritz <mazda63@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 4:59 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. jules moritz
8285 NW Mitchell Dr Corvallis, OR 97330-2824 mazda63@comcast.net

From: dorindask@everyactioncustom.com on behalf of Dorinda Kelley <dorindask@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 5:05 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
ms Dorinda Kelley
314 NE 53rd Ave Portland, OR 97213-3016 dorindask@gmail.com

From: fuller3995@everyactioncustom.com on behalf of Sharon Fuller <fuller3995@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 5:13 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Sharon Fuller
15808 NE Sacramento St Portland, OR 97230-5218 fuller3995@msn.com

From: cjwenz123@everyactioncustom.com on behalf of Carla Wenzlaff <cjwenz123@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 5:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Miss Carla Wenzlaff
1642 E 43rd Ave Eugene, OR 97405-4408
cjwenz123@gmail.com

From: sueacraig@everyactioncustom.com on behalf of Sue Craig <sueacraig@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 5:33 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Sue Craig
27233 Huey Ln Eugene, OR 97402-9410
sueacraig@gmail.com

From: marceagle@everyactioncustom.com on behalf of Marc Kitaen <marceagle@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 6:05 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Marc Kitaen
15420 Olde Highway Ste 80 El Cajon, CA 92021 marceagle@cox.net

From: momoneal77@everyactioncustom.com on behalf of Maureen O'Neal <momoneal77@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 6:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Maureen O'Neal
9100 SW 80th Ave Portland, OR 97223-8981 momoneal77@gmail.com

From: ghipszky@everyactioncustom.com on behalf of Ginger Hipszky <ghipszky@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 6:44 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs Ginger Hipszky
5805 Bourke Dr Colorado Springs, CO 80919-2448 ghipszky@gmail.com

From: kelf.nh@everyactioncustom.com on behalf of Kellie Smith <kelf.nh@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:02 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Kellie Smith
13 Brandy Ln Deering, NH 03244-6500
kelf.nh@live.com

From: jjrb@everyactioncustom.com on behalf of Gary Landers <jjrb@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:08 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council

As an Oregon wildlife rehabilitator specializing in raptors for 17 years I would request the Council not allow an extension of the Summit Ridge Wind Farm without a complete update on available technology to prevent avian and bat collisions with wind turbines. The USFWS has already documented that Golden Eagles are in decline across the Western United States (Bald and Golden Eagles Population demographics and estimation of sustainable take in the United States, 2016 update). The golden eagle would be affected by this wind farm.

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr Gary Landers

15691 Trapper Point Rd Sisters, OR 97759-9671 jjrb@q.com

From: Private500@everyactioncustom.com on behalf of Cheryl Krause <Private500@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:20 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Cheryl Krause
1942 Ursinus Ave Lancaster, PA 17603-4411 Private500@yahoo.com

From: prim8lk@everyactioncustom.com on behalf of Lynn Killam <prim8lk@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:48 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Lynn Killam
1615 Viking Dr Houston, TX 77018-1816
prim8lk@aol.com

From: momoneal77@everyactioncustom.com on behalf of Maureen O'Neal <momoneal77@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 7:50 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Maureen O'Neal
9100 SW 80th Ave Portland, OR 97223-8981 momoneal77@gmail.com

From: mgmlark@everyactioncustom.com on behalf of Jean Ella <mgmlark@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 9:23 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Jean Ella
91237 Donna Rd Springfield, OR 97478-9785 mgmlark@gmail.com

From: blueharris@everyactioncustom.com on behalf of Jamie Harris <blueharris@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 10:09 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Jamie Harris
355 Main St Broomfield, CO 80020-1901
blueharris@q.com

From: denaturn62@everyactioncustom.com on behalf of Dena Turner <denaturn62@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 10:30 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Dena Turner
1122 SE 60th Ave Portland, OR 97215-2805 denaturn62@gmail.com

From: heike_brown@everyactioncustom.com on behalf of H Brown <heike_brown@everyactioncustom.com>
Sent: Wednesday, February 20, 2019 3:13 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. H Brown
NORMANDY Ct Fairbanks, AK 99703
heike_brown@yahoo.com

From: Dawn Smallman
Sent: Wednesday, February 20, 2019 3:31 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Dawn Smallman
1148 SE 50th Ave
Portland, OR 97215

February 20, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Dawn Smallman

From: Paulette Switzer-Tatum
Sent: Wednesday, February 20, 2019 4:11 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Paulette Switzer-Tatum
17435 SW Blanton
Aloha, OR 97078

February 20, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Paulette Switzer-Tatum

From: Patricia Mizutani
Sent: Wednesday, February 20, 2019 6:21 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Patricia Mizutani
2335 NE 24th Ave
Portland, OR 97212

February 20, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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Sincerely,
Patricia Mizutani

From: John Nelson
Sent: Wednesday, February 20, 2019 3:11 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

John Nelson
524 W 3rd Pl.
The Dalles, OR 97058

February 20, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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Sincerely,
John Nelson

From: Loriconsaga@everyactioncustom.com on behalf of Lori Consaga <Loriconsaga@everyactioncustom.com>
Sent: Thursday, February 21, 2019 3:00 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs Lori Consaga
65 Deans Corner Rd Brewster, NY 10509-2601 Loriconsaga@yahoo.com

From: foster-mike@everyactioncustom.com on behalf of Michael Foster <foster-mike@everyactioncustom.com>
Sent: Thursday, February 21, 2019 4:16 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Michael Foster
167 Cornell Dr Kearneysville, WV 25430-3771 foster-mike@hotmail.com

From: kreuscher3@everyactioncustom.com on behalf of Marion Kreuscher <kreuscher3@everyactioncustom.com>
Sent: Thursday, February 21, 2019 4:26 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms. Marion Kreuscher
15422 SW 85th Ln Miami, FL 33193-1207
kreuscher3@bellsouth.net

From: sanand125@everyactioncustom.com on behalf of Sanand Dilip <sanand125@everyactioncustom.com>
Sent: Thursday, February 21, 2019 5:16 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Mr. Sanand Dilip
308 W Main St Alliance, OH 44601-2317
sanand125@gmail.com

From: kim.beck@everyactioncustom.com on behalf of Kim Beck <kim.beck@everyactioncustom.com>
Sent: Thursday, February 21, 2019 6:05 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

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Sincerely,
Ms Kim Beck
7948 Pleasant Creek Rd Rogue River, OR 97537-4774 kim.beck@comcast.net

From: tsphenicie@everyactioncustom.com on behalf of Terrie Phenicie <tsphenicie@everyactioncustom.com>
Sent: Thursday, February 21, 2019 7:12 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Terrie Phenicie
W15738 Limberg Ln Athelstane, WI 54104-9433 tsphenicie@gmail.com

From: justin_loveland@everyactioncustom.com on behalf of Justin Loveland <justin_loveland@everyactioncustom.com>
Sent: Thursday, February 21, 2019 7:24 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Justin Loveland
4517 NE Rodney Ave Portland, OR 97211-2733 justin_loveland@yahoo.com

From: lilianaclaudia68@everyactioncustom.com on behalf of Liliana fiorini <lilianaclaudia68@everyactioncustom.com>
Sent: Thursday, February 21, 2019 7:39 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Liliana fiorini
308 W Main St Alliance, OH 44601-2317
lilianaclaudia68@gmail.com

From: katsampson333@everyactioncustom.com on behalf of katherine Sampson <katsampson333@everyactioncustom.com>
Sent: Thursday, February 21, 2019 7:41 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Miss katherine Sampson
308 W Main St Alliance, OH 44601-2317
katsampson333@gmail.com

From: kyennew@everyactioncustom.com on behalf of Kyenne Williams <kyennew@everyactioncustom.com>
Sent: Thursday, February 21, 2019 8:02 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Miss Kyenne Williams
1926 NE 108th Ave Portland, OR 97220-3032 kyennew@yahoo.com

From: yourali747@everyactioncustom.com on behalf of Ali Van Zee <yourali747@everyactioncustom.com>
Sent: Thursday, February 21, 2019 8:32 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Ali Van Zee
545 N Harold St Fort Bragg, CA 95437-3307 yourali747@gmail.com

From: charm71@everyactioncustom.com on behalf of Charlotte Maloney <charm71@everyactioncustom.com>
Sent: Thursday, February 21, 2019 8:38 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I strongly urge you to deny the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet despite the previous two extensions, the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project.

I am deeply concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles- plus, three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys.

Without survey data it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed.

Because Pattern Development has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

ff Pattern Energy desires to move forward with this controversial project, it needs to file a new application- including current data of the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Charlotte Maloney
4391 Shadow Wood Dr Eugene, OR 97405-7004 charm71@comcast.net

From: laurelperry82@everyactioncustom.com on behalf of Laurie Perry <laurelperry82@everyactioncustom.com>
Sent: Thursday, February 21, 2019 2:02 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Laurie Perry
2210 SW Ecole Ave Beaverton, OR 97005-1146 laurelperry82@gmail.com

From: Judy Jordan
Sent: Thursday, February 21, 2019 10:32 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Judy Jordan
7067 SE Clinton St.
Portland, OR 97206

February 21, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Judy Jordan

From: John Milbert
Sent: Thursday, February 21, 2019 9:52 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

John Milbert
1812 Jefferson Ave
La Grande, OR 97850

February 21, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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Sincerely,
John Milbert

From: kimczwicker@everyactioncustom.com on behalf of Kim Zwicker <kimczwicker@everyactioncustom.com>
Sent: Thursday, February 21, 2019 11:10 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

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Sincerely,
Ms. Kim Zwicker
50 S Common St Apt 210 Lynn, MA 01902-4448 kimczwicker@yahoo.com

From: Judy Jordan
Sent: Thursday, February 21, 2019 10:32 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Judy Jordan
7067 SE Clinton St.
Portland, OR 97206

February 21, 2019

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Judy Jordan

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Sent: Thursday, February 21, 2019 9:52 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

John Milbert
1812 Jefferson Ave
La Grande, OR 97850

February 21, 2019

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Sincerely,
John Milbert

From: Nathan Baker
Sent: Thursday, February 21, 2019 6:16 PM
To: MAY Luke * ODOE
Cc: 'Gary Kahn'; HEIKEN Doug; Dan Morse; Rory Isbell; SALLINGER Bob; Tom Lawler
Subject: Summit Ridge Wind Farm – Request for Amendment 4
Attachments: Comments on Summit Ridge Wind Farm Amendment 4.pdf; Smallwood comments on Summit Ridge_022119.pdf

To Whom It May Concern:

Please find attached the comments of Friends of the Columbia Gorge, Oregon Wild, the Oregon Natural Desert Association, Central Oregon LandWatch, the Audubon Society of Portland, and the East Cascades Audubon Society regarding the Request for Amendment 4 to the Summit Ridge Wind Farm site certificate.

Thank you very much for your time and consideration.

Nathan Baker, Senior Staff Attorney
Friends of the Columbia Gorge
nathan@gorgefriends.org
333 SW 5th Ave., Suite 300
Portland, OR 97204-1717
(503) 241-3762 x101

Shawn Smallwood, PhD
3108 Finch Street
Davis, CA 95616

Oregon Energy Facility Siting Council
c/o Luke May, Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301
luke.may@oregon.gov

21 February 2019

Re: Summit Ridge Wind Farm – Request for Amendment 4

Dear Chair Beyeler and Members of the Council,

On behalf of Friends of the Columbia Gorge, Oregon Wild, the Oregon Natural Desert Association, Central Oregon LandWatch, the Audubon Society of Portland, and East Cascades Audubon Society, I write to comment on the Request for Amendment 4 for the Summit Ridge Wind Farm, which requests a postponement of construction start and end dates for the project and which proposes an amended Habitat Mitigation Plan (January 2019). I primarily wish to comment on (1) the suitability of the habitat assessment underlying the amended Habitat Mitigation Plan, and (2) the need to update baseline surveys, project impact predictions, mitigation measures, and post-construction monitoring protocols. Updated surveys and analyses are needed in part because over the near-decade that has passed since the primary baseline study (Northwest Wildlife Consultants 2010), science has made vast improvements in field survey methods and in our understanding of wind turbine collision factors, displacement effects, and cumulative impacts related to wind projects. Methodology has vastly improved in preconstruction studies needed to predict project-scale and wind turbine-scale impacts, to measure post-construction impacts, and to assess whether and to what degree specific mitigation measures can be tested for efficacy.

My qualifications for preparing these comments as expert comments are the following. I earned a Ph.D. degree in Ecology from the University of California at Davis in 1990. My research has been on animal density and distribution, habitat selection, habitat restoration, interactions between wildlife and human infrastructure and activities, conservation of rare and endangered species, and on the ecology of invading species. I have performed research and monitoring on renewable energy projects for 20 years, and I have authored many peer-reviewed reports, papers, and book chapters on fatality monitoring, fatality rate estimation, mitigation, micro-siting, and other issues related to biological impacts of wind energy generation. I served for five years on the Alameda County Scientific Review Committee (SRC) that was charged with overseeing the fatality monitoring and mitigation measures in the Altamont Pass Wind Resource Area (APWRA), and I prepared many comment letters on proposed renewable energy projects. I collaborate with colleagues worldwide on the underlying science and policy issues related to renewable energy impacts on wildlife.

Most of my wind energy work has been in the APWRA, which is where much of the research funding has been directed to understanding factors related to wind turbine collisions and to finding solutions. The APWRA is the longest-monitored wind resource area in the world for collision fatalities and relative abundance and behaviors of affected species, and the wind resource area with by far the largest number of documented golden eagle fatalities. There is no other place where more could have been learned about how and why eagles collide with wind turbines and what can be done to mitigate the impacts. In the APWRA I have performed research on behavior, relative abundance (use rates), fatality rates, fatality detection trials, nocturnal activities of bats, owls and other wildlife, and research on spatial patterns of raptor prey species. I am participating with a GPS/GSM telemetry study of golden eagles within and beyond the APWRA. I have manipulated livestock grazing as a mitigation measure, and I have participated with mitigation involving power pole retrofits, hazardous turbine removals, winter shutdowns of wind turbines, and repowering of wind projects based on careful siting. I have also opportunistically documented wildlife responses to wildfires in the APWRA. I have personally discovered too many golden eagle fatalities and one bald eagle fatality in the APWRA, including mortally wounded eagles that were later euthanized. I personally witnessed hundreds of near misses that golden eagles and other raptor species have experienced at wind turbines, transmission lines and electric distribution lines in the APWRA. I have been involved with renewable energy impacts on all fronts – study design, fieldwork on fatalities and use and behavior and ecological relationships, study administration, hypothesis-testing, report writing, presentations at meetings, formulation of mitigation, micro-siting, study review, policy review and decision-making, and public outreach.

I provided expert comments on a project proposed and later built by Babcock & Brown, out of which Pattern Energy emerged as a company soon after. I later contracted with Pattern Energy to assist with the preparation of an Environmental Impact Report of the same project I commented on as an expert. I also developed collision hazard models and provided micro-siting recommendations to minimize raptor impacts at a proposed Pattern Energy project, and I assisted with analysis of fatality monitoring data from one of Pattern Energy's projects. Lastly, as a member of the Alameda County SRC, I oversaw monitoring and mitigation at two Pattern Energy projects in the APWRA. My CV is attached.

HABITAT MITIGATION PLAN

The applicant is required by Oregon Administrative Rule (OAR) 345-021-0010(1)(p)(B) to provide an *"[i]dentification of all fish and wildlife habitat in the analysis area, classified by the general fish and wildlife habitat categories as set forth in OAR 635-415-0025 . . . and a description of the characteristics and condition of that habitat in the analysis area, including a table of the areas of permanent disturbance and temporary disturbance (in acres) in each habitat category and subtype."* In addition, the applicant is required by OAR 345-021-0010(1)(p)(C) to provide "*[a] map showing the locations of the habitat*," is required by OAR 345-021-0010(1)(p)(D) to identify "*all*

State Sensitive Species that might be present in the analysis area," and is required by OAR 345-021-0010(1)(p)(E) to provide "*[a] baseline survey of the use of habitat in the analysis area*" by State Sensitive Species. Finally, the applicant is required by OAR 345-021-0010(1)(p)(F) to describe "*the nature, extent and duration of potential adverse impacts on the habitat identified in (B) and species identified in (D) that could result from construction, operation and retirement of the proposed facility*," and is required by OAR 345-021-0010(1)(p)(G) to provide "*a description of any measures proposed by the applicant to avoid, reduce, or mitigate the potential adverse impacts described in (F) in accordance with the general fish and wildlife habitat mitigation goals and standards described in OAR 635-415-0025 . . . , and a discussion of how the proposed measures would achieve those goals and requirements*."

For its part, the Wasco County Land Use and Development Ordinance (LUDO) at LUDO § 19.030.C.5 requires the Council to "*tak[e] into account mitigation, siting, design, construction, and operation [of] the energy facility*" in order to ultimately ensure that the facility "*will not cause significant adverse impact to important or significant natural resources*," and authorizes the Council to require "*monitoring and mitigation actions that [the Council] determines appropriate*."

Several key premises of the amended Habitat Mitigation Plan are incorrect (see Attachment D of Proposed Order: Draft Habitat Mitigation Plan for the Summit Ridge Wind Project (As Amended), January 2019). The Habitat Mitigation Plan states that Northwest Wildlife Consultants (2010) had mapped habitat, performed a habitat quality assessment, conducted avian use surveys, and inventoried bat species, among other tasks. As I will explain further below, Northwest Wildlife Consultants did not map habitat as defined under OAR 635-415-0005. They did not assess habitat quality because they measured no variables representative of population performance indicative of habitat quality. The use surveys were not designed nor intended for supporting habitat mapping or assessing habitat quality, and were insufficient for the intended purpose, which was for assessing wind turbine collision risk. The bat surveys were grossly insufficient for supporting an "inventory," and because they were performed at ground-level, they never could have informed of collision risk for bats that fly at the heights of wind turbine rotors.

Conclusions in the Habitat Mitigation Plan, and responses to Energy Facility Siting Council (EFSC) standards in the Request for Amendment, rely upon inappropriate studies and unsuitable study methods in the context of a wind energy project. Use surveys originated in early wind energy projects to meet a specific need for predicting wind turbine collision risk (Smallwood 2017b), and were based on the largely unsubstantiated assumption that collision rates correlate positively with relative abundance of flying birds or bats (de Lucas et al. 2008, Ferrer et al. 2012, Hull et al. 2013, Hein et al. 2013, Smallwood 2017a,b). One reason for poor prediction performance has been variation in baseline study methods and poor execution of both use surveys and fatality monitoring (Smallwood 2017a,b, Smallwood et al. 2018). Another reason has been that flight behaviors relate much more strongly to collision risk than does relative abundance (Smallwood et al. 2017b). But whatever the reasons for

poor prediction performance, use surveys were not intended for assessing habitat in wind projects.

Use surveys could be adapted to support habitat assessments for some species, though not for habitat quality, by adjusting use rates for large biases (discussed later). So long as data measured from use surveys meet or exceed the spatial resolution of environmental variables measured as potential habitat elements, use survey data could contribute to habitat analysis. Unfortunately, Northwest Wildlife Consultants (2010) measured use rates within plots of 800-m survey radius. These plots each encompassed 201 hectares (unrealistically assuming flat terrain) and included multiple mapped vegetation cover types to which the use survey observations, given the way they were measured, could not be linked. If one of the five within-plot golden eagle observations were in Plot X and the survey radius of Plot X encompassed old field, dryland wheat, pond, riparian, exotic annual grassland, and rabbitbrush, with which of these six cover types should we associate the eagle? Unless the use surveys are tailored for habitat analysis, such surveys are not useful for habitat analysis. In fact, the summary of use survey methods in Northwest Wildlife Consultants (2010) did not include steps for habitat assessment, but instead focused on recording flight attributes at the location where a bird was first seen or where it approached closest to the observer or where it crossed a ridge structure.

Habitat quality is measured by population performance metrics, none of which were measured in Northwest Wildlife Consultants (2010) for any species. Population performance metrics can include productivity, abundance, stability, persistence, and other terms that none of them alone can comprehensively represent habitat quality. Habitat quality is a controversial term in wildlife ecology; it is more conceptual than measurable. Anyhow, it was not measured in any form in Northwest Wildlife Consultants (2010).

The specific metrics quantified from avian use surveys were mean use (mean number of birds seen per 20 min survey), percent composition, and frequency of occurrence among 20-min survey sessions (Northwest Wildlife Consultants 2010:10). None of these metrics were related to mapped habitat in any way, so they contributed nothing to habitat assessment. Apparently independent of the avian use metrics, "habitat" was characterized as a map of vegetation cover types – a map for which no on-site, species-specific data had contributed. The habitat map was delineated from aerial imagery, marking boundaries where Northwest Wildlife Consultants saw clear demarcations in land cover, followed by a bit of ground-truthing. No avian use surveys or acoustic bat surveys, nor any other surveys, had anything to do with the formulation of this "habitat" map.

Habitat Assessment

A potential project impacts analysis is needed that scientifically compares habitat conditions for each species pre- and post-construction, and that considers any interaction effects from extensive wildfires that altered vegetation cover on the project

area in 2018. Habitat is defined by the species, and is more than just a desktop analyst's decision on delineating cover types viewable on aerial imagery. Habitat is a product of perceptions of an organism's environment – where opportunities might be found and dangers avoided or minimized. Thus, an important aspect of habitat analysis in the context of a wind project is any perceived threat posed by wind turbines and maintenance traffic that might result in displacement (Leddy et al. 1999, Whitfield and Madders 2006, Pearce-Higgins et al. 2009, Garvin et al. 2011, Langston 2013). Displacement is habitat loss. The mapping of vegetation cover types is irrelevant to an assessment of displacement caused by a species' instinctual avoidance of the wind turbines, wind project infrastructure, or maintenance traffic. Likewise, avian use surveys and bat acoustic surveys are irrelevant to this type of assessment if they collect data that are too crude for comparisons before and after wind project construction.

As examples of displacement effects, white-tailed eagle breeding success declined near a Norwegian wind project because breeding territories within 500 m of wind turbines were vacated (Dahl et al. 2012). Tasmanian wedge-tailed eagles (*Aquila audax fleayi*) and white-bellied sea-eagles (*Haliaeetus leucogaster*) flew through wind projects along flight paths that maximized their distances from wind turbines (Hull and Muir (2013). Telemetered golden eagles were found to increase flight heights while passing over wind projects (Johnston et al. 2014). Nesting birds in grasslands were reduced within 80 m of wind turbines (Leddy et al. 1999). None of these examples relied on vegetation cover maps, but rather measured displacement effects as distances from wind turbines. Measuring and mitigating habitat impacts in a wind project context requires measurements of animals relative to planned and constructed wind turbine locations, which is yet to be accomplished at Summit Ridge.

On the issue of whether the project will be consistent with the general fish and wildlife habitat mitigation goals and standards in OAR 635-415-0025, Tetra Tech (2018:29) offers a 2009 habitat analysis supporting the conclusion that the project meets the standards despite changes to the environment caused by extensive wildfires in 2018 (Tetra Tech 2018:30). Tetra Tech explains that Northwest Wildlife Consultants previously constructed a map of available vegetation categories and then assigned wildlife species to those categories. A desktop analysis followed, concluding that the wildfire degraded habitat quality, but that the wind project would not reduce habitat quality. Tetra Tech's conclusions, however, are based on scientifically incorrect characterizations of habitat, an outdated and insufficient analysis from nearly a decade ago that is not likely to reflect current conditions, an unsubstantiated assumption that burned vegetation negatively affects all wildlife, and absence of any consideration of an interaction effect between vegetation changes and the proposed wind project.

OAR 635-415-0005 defines habitat as "*the physical and biological conditions within the geographic range of occurrence of a species, extending over time, that affect the welfare of the species or any sub-population or members of the species*." This definition is consistent with the scientific definition of the term, which generally is that portion of the environment used by a particular species (Hall et al. 1997, Morrison et al. 1998). Habitat is typically characterized for a species following use-and-availability

studies, in which the occurrences of a species are compared to the availability of measured environmental elements, such as soil types, terrain features, vegetation cover types, seasons and times of day. From these comparisons, scientists infer species' habitat affinities (Smallwood 2002), or the assignment of particular portions of the environment where a particular species is typically found in numbers equal to or exceeding the number that would be expected of a random or uniform distribution across a broader space or time period. Under Implementation of Department Habitat Mitigation Recommendations (OAR 635-415-0005), 6 Habitat Categories are described along a continuum of habitat affinity, of which Habitat Category 1 would represent strongest affinity and Habitat Category 6 weakest affinity. But any categorization under these rules is not as simple as a continuum of use versus availability, as a species' use of a portion of the environment could be measured as lower than proportional while still meeting a critically important function. OAR 635-415-0025 appropriately allows for both a quantified use-and-availability approach and a categorization based on expert knowledge in assigning portions of the environment to its 6 Habitat Categories. The critical point here is that the species informs the investigators of its habitat affinities through its expressions of behavior, spatial-temporal distribution, and performance, rather than the investigators' lumping of species into conveniently available, catch-all, vegetation cover types as part of a "desktop analysis."

The Summit Ridge habitat map was not based on use-and-availability analysis, nor did it characterize habitat for any particular species. The approach used by Northwest Wildlife Consultants in 2010 was inconsistent with both the scientific definition of habitat and Oregon's definition in OAR 635-415-0005. Even more inconsistent, however, is the current claim that habitat was degraded as a result of the 2018 wildfires (Tetra Tech 2018:30). Wildlife species vary in their responses to changes in the environment, so vegetation cover changes caused by a wildfire will displace some species while attracting others. I have seen and quantified such variation in response to fires when I performed a 13-year study of wildlife responses to mechanical alteration of the environment as well as the use of controlled burns (Smallwood and Morrison 2013; Smallwood and Morrison paper in prep.).

Early successional vegetation following a fire can increase the numbers and availability of some small mammal species to aerial predators. For example, vegetation-removal treatments in one of my study areas resulted in a 7.4-fold increase in ground squirrel burrow systems and a 4-fold increase in burrowing owl nest sites relative to control sites, and the spatial distributions of both squirrels and burrowing owls shifted following the treatments (Smallwood and Morrison in prep.). In an effort to reduce wind turbine collision fatalities of raptors in the Altamont Pass, I led a study in which we switched grazing regimes from cattle to sheep and we varied the density of animal units to elicit quantifiable responses of raptors to changes in ground cover (Smallwood et al. 2009). We documented substantial responses. Since that study I have continued to document spatial and numerical shifts of small mammals, raptors and other birds to continuing managed variation in sheep grazing intensity (Smallwood unpublished data).

In fact, even without a major change in vegetation cover, wildlife typically shift activity areas every generation or so, as reported for >130 animal species worldwide (Taylor and Taylor 1979) and as found in my own research (Smallwood 2016, Smallwood and Morrison 2018, Smallwood unpublished data). In the Altamont Pass, for example, I began monitoring burrowing owls among 46 large sampling plots in 2011 (Smallwood et al. 2013), and have since found that I cannot predict the burrowing owl distribution several years following any given year (Figure 1; data from 2017 and 2018 further confirm the loss of predictability, but are not shown in this figure). Whereas I obtained a strong correlation between the number of breeding pairs per sampling plot in 2012 relative to the number of breeding pairs in those same plots in 2011, my correlation visibly declines with each succeeding year until the 2016 distribution bears no resemblance to the 2011 distribution, as indicated by the regression slope of 0 in Figure 1. Hypothesized causes for this shifting mosaic pattern of abundance include (1) escape from parasite loads, (2) escape from predator loads, (3) accumulating around more abundant food supplies while allowing food replenishment at vacated sites, (4) natural accumulation of dispersing young while adults in the natal area senesce, or (5) some combination of these causes. Whatever the cause, it is mistaken to regard wildlife distributions as static or habitat as spatially fixed.

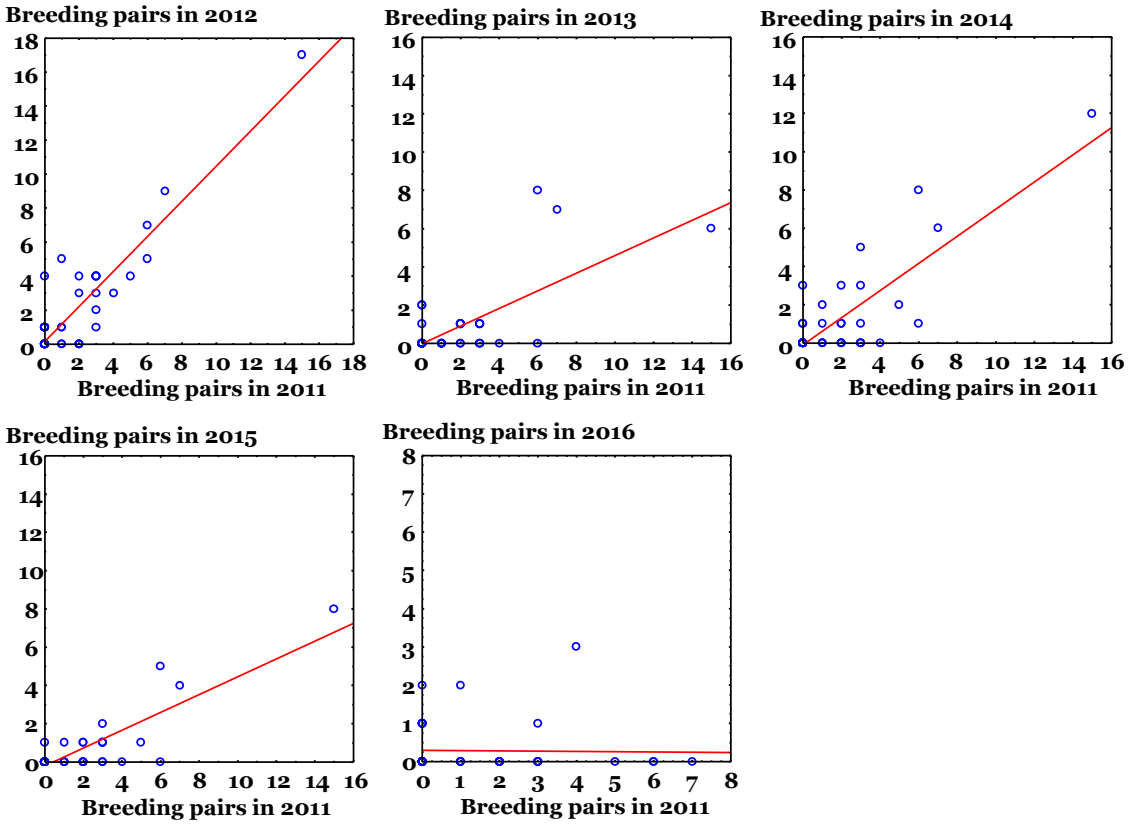


Figure 1. *Breeding pairs of burrowing owls among 46 plots in the APWRA from 2012 through 2016 as functions of breeding pairs in 2011 (Smallwood, unpublished data).*

Another way to answer the question of whether one or two years of preconstruction use surveys can generate representative use rates many years into the future is to test the degree to which one year of use rates can predict use rates in subsequent years. A follow-up question would be how predictive do the preconstruction use rates need to be for predicting a wind project's impacts? In lieu of a scientific deliberation on this follow-up question, let's say the answer is 10% prediction accuracy. With this answer serving as my standard, I should expect to see most of the use rates calculated from 84 APWRA survey stations in any given year falling within the 90% prediction interval that represents use rates of some previous year.

I tried the comparison using golden eagle use survey data from multiple years in the APWRA. One year's use rates predicted subsequent use rates with decreasing accuracy as the number of years separating the use rates increased (Table 1). With one year difference between use rates, the linear regression slope differed significantly from 0 in 4 of 6 years, but r^2 averaged only 0.34 among the 4 years with slopes >0 and root-mean square error (RMSE) averaged 0.48 and the proportion of use rates included within the 90% prediction intervals averaged only 45% of the 19 stations (Table 1, Figure 2). With two years difference between use rates, the linear regression slope differed significantly from 0 in 2 of 5 comparisons, but r^2 averaged only 0.46 between the 2 years with slopes >0 and RMSE averaged 0.45 and the proportion of use rates included within the 90% prediction intervals averaged only 42% of the 19 stations (Table 1, Figure 3). With three years difference between use rates, the linear regression slope differed significantly from 0 in 1 of 4 comparisons, but r^2 was only 0.19 for the comparison with slope >0 and RMSE was 0.45 and the proportion of use rates included within the 90% prediction intervals was only 32% of the 19 stations (Table 1, Figure 4). With four years difference between use rates, the linear regression slope differed significantly from 0 in 1 of 3 comparisons, but r^2 was only 0.19 for this comparison with slope >0 and RMSE was 0.46 and the proportion of use rates included within the 90% prediction intervals was only 26% of the 19 stations (Table 1, Figure 5). With five years difference between use rates, the linear regression slope differed significantly from 0 in neither comparison (Table 1, Figure 5). Even among comparisons for which regression slopes differed significantly from 0, the relationship in golden eagle use rates between years was weak. The relationship further weakened with the number of years between use rates. As was clear for burrowing owls (Figure 1), golden eagle use rates measured over one year in one place cannot be relied upon to predict golden eagle use 3 years hence.

It is also noteworthy that Figures 1 through 5 reveal false-0 use rates, as indicated by data points on the Y-axis. This revelation can be found wherever use rates were 0 for burrowing owls or golden eagles, but later found to be >0. Had the use survey effort stopped after the year with a 0 later found to be >0 at any given site, the result would have been a false determination of absence. False-0 outcomes are important because they cannot be adjusted and can lead to adverse surprises after the project is constructed. The only way to avoid the effects of false-0's is to survey long enough to minimize the likelihood of recording false-0's.

Table 1. *Summary of one year's golden eagle use rates (eagles per hour) regressed on a previous year's use rates among 19 wind projects across the Altamont Pass Wind Resource Area, including a hypothetical result for which use rates in the subsequent year (2010) differed by 10% from use rates in 2009 (orange highlight).*

Pre-year	Post-year	Slope, b	P < 0.05	r^2	RMSE	Proportion within 90% prediction interval
2009	2010	0.99	yes	0.97	0.11	0.95
2006	2007	0.34	no	0.09	0.48	0.42
2007	2008	0.86	yes	0.40	0.35	0.47
2008	2009	0.69	yes	0.36	0.47	0.42
2009	2010	0.56	yes	0.23	0.56	0.37
2010	2011	0.54	yes	0.38	0.53	0.53
2011	2012	0.24	no	0.00	0.59	0.21
2006	2008	0.30	no	0.01	0.50	0.42
2007	2009	0.59	no	0.12	0.42	0.26
2008	2010	0.88	yes	0.56	0.39	0.47
2009	2011	0.56	yes	0.36	0.51	0.37
2010	2012	0.31	no	0.06	0.67	0.32
2006	2009	0.62	yes	0.20	0.45	0.32
2007	2010	0.58	no	0.09	0.43	0.26
2008	2011	0.43	no	0.15	0.54	0.53
2009	2012	0.18	no	0.00	0.66	0.21
2006	2010	0.65	yes	0.19	0.46	0.26
2007	2011	-0.01	no	0.00	0.46	0.32
2008	2012	0.10	no	0.00	0.61	0.16
2006	2011	0.42	no	0.09	0.48	0.26
2007	2012	0.15	no	0.00	0.45	0.21

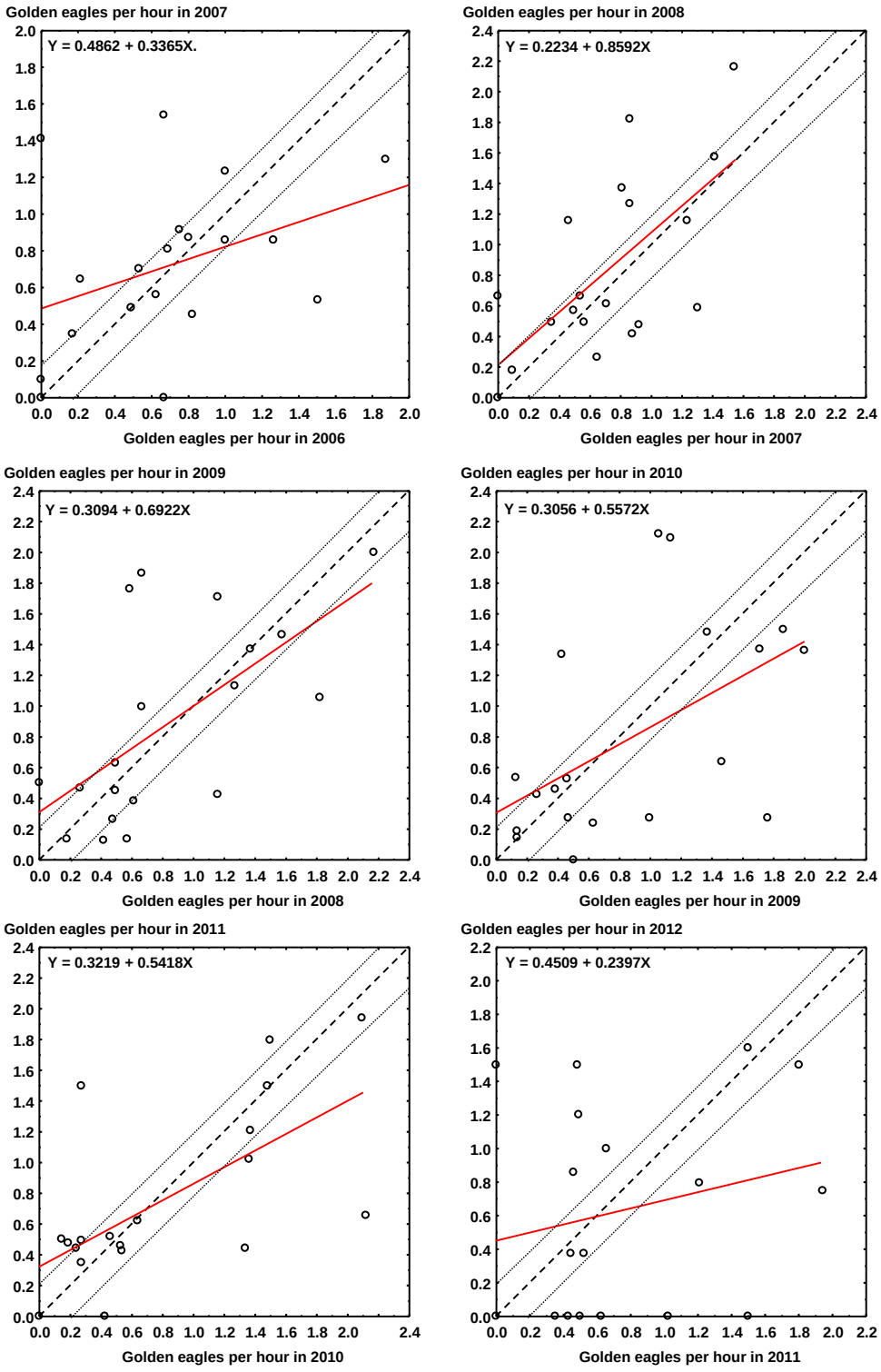


Figure 2. *Golden eagle use rates at 19 APWRA wind projects regressed (red line) on use rates measured the year before and compared to slope of equivalency (dashed line) and 90% prediction interval calculated from hypothetical 2010 use rates differing 10% from 2009 use rates.*

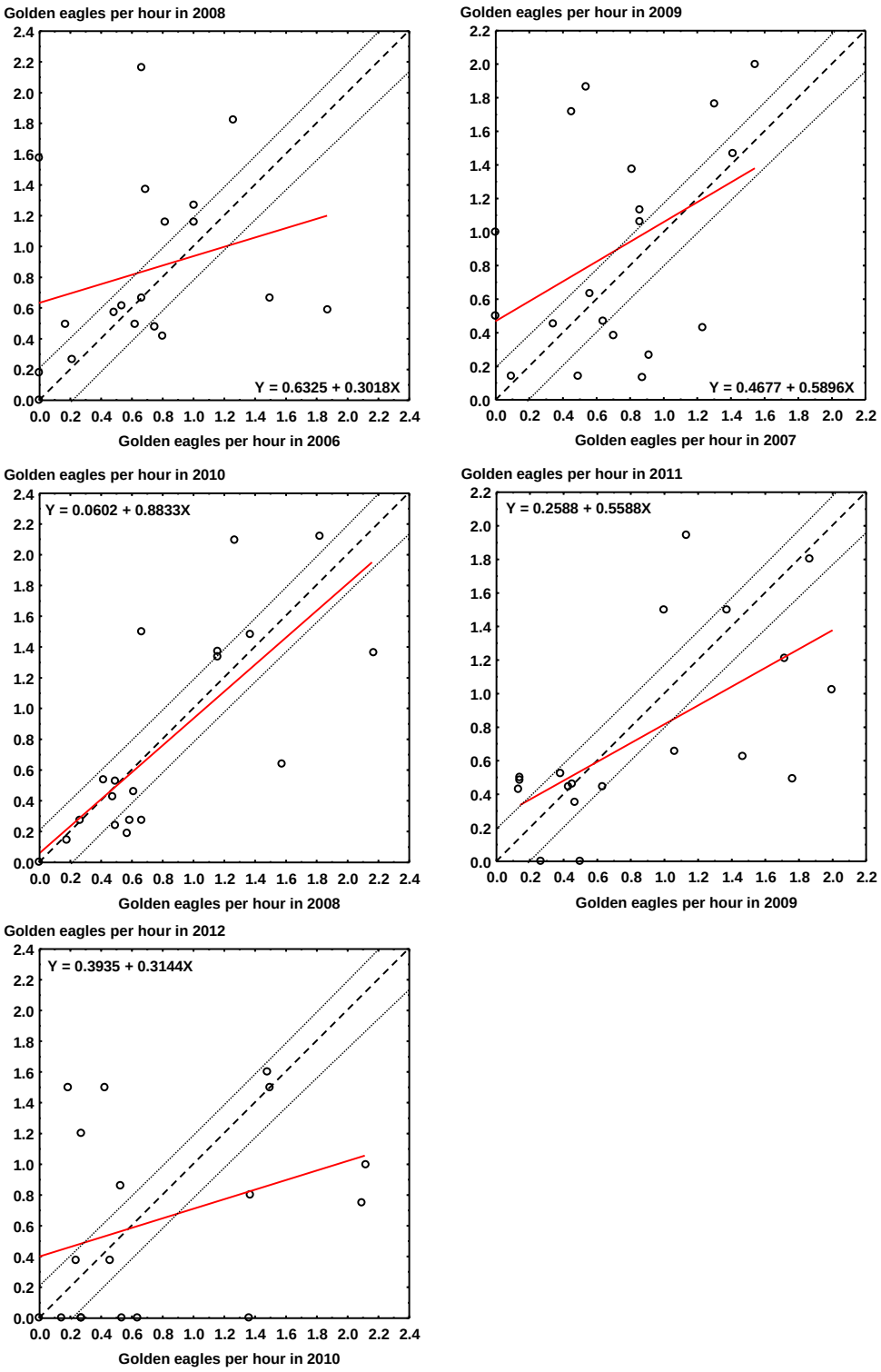


Figure 3. *Golden eagle use rates at 19 APWRA wind projects regressed (red line) on use rates measured two years before and compared to slope of equivalency (dashed line) and 90% prediction interval calculated from hypothetical 2010 use rates differing 10% from 2009 use rates.*

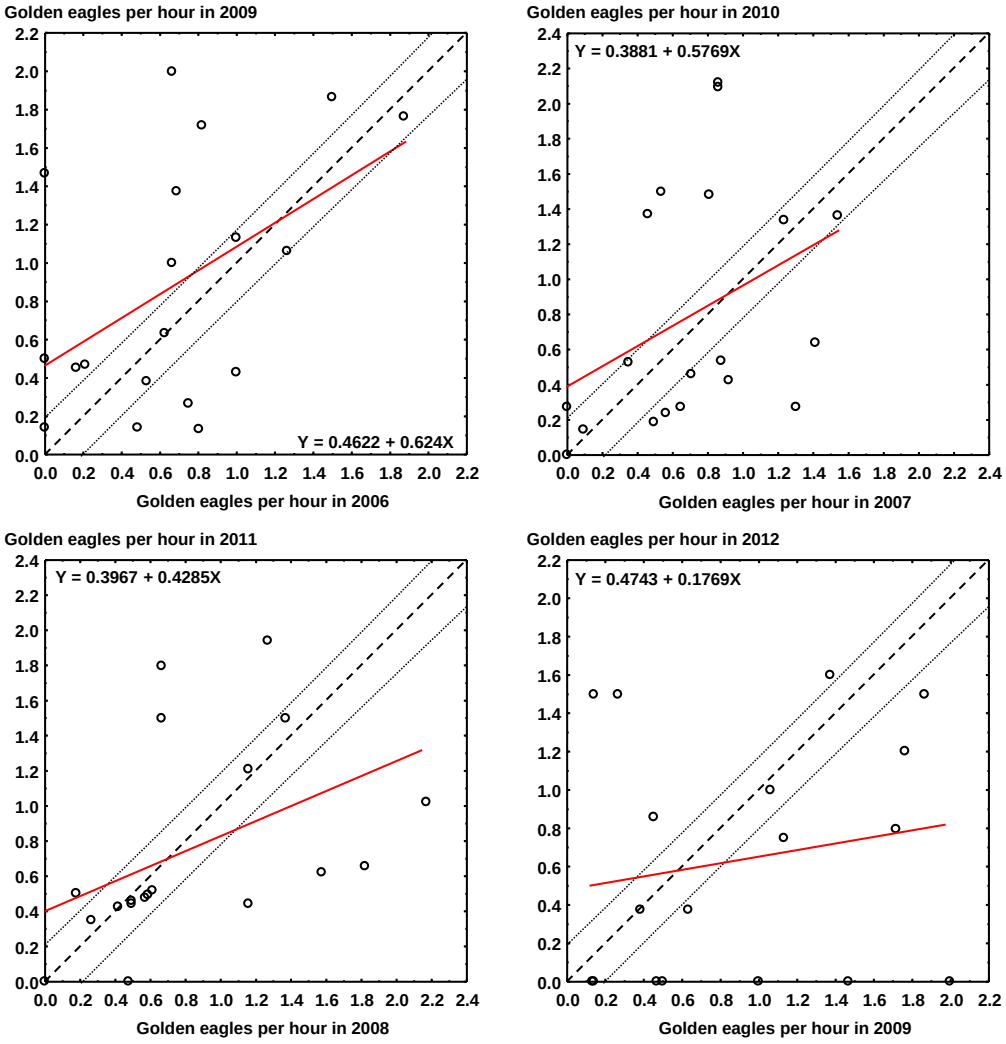


Figure 4. *Golden eagle use rates at 19 APWRA wind projects regressed (red line) on use rates measured three years before and compared to slope of equivalency (dashed line) and 90% prediction interval calculated from hypothetical 2010 use rates differing 10% from 2009 use rates.*

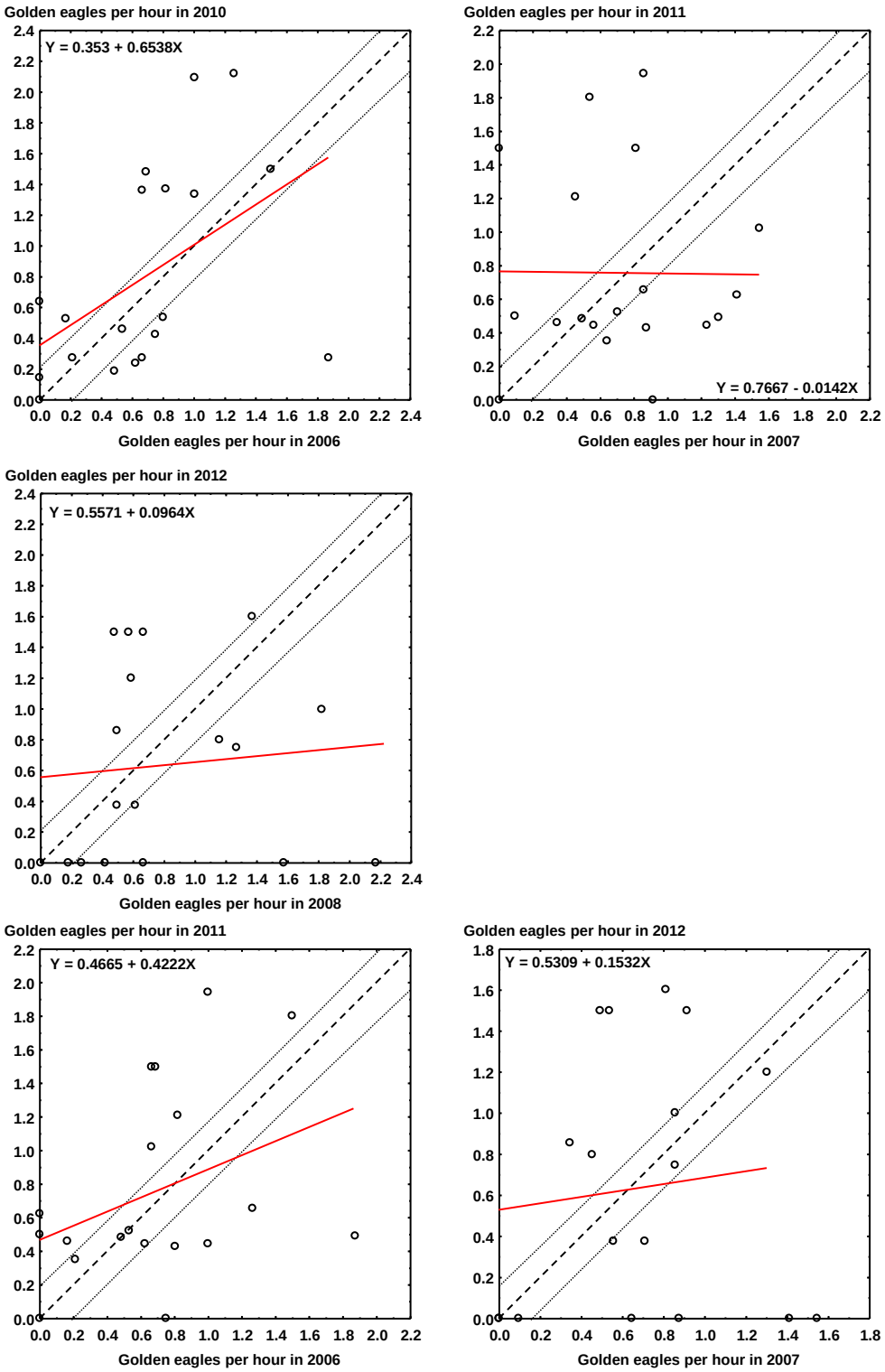


Figure 5. *Golden eagle use rates at 19 APWRA wind projects regressed (red line) on use rates measured four years (top 3 graphs) and five years (bottom 2 graphs) before and compared to slope of equivalency (dashed line) and 90% prediction interval calculated from hypothetical 2010 use rates differing 10% from 2009 use rates.*

Whereas the use surveys performed at Summit Ridge in 2005-2010 can inform the types of environment where a particular species is more likely to be found, assuming the 'use' survey data were mapped and the mapped data subjected to appropriate use-and-availability analysis, I would not agree that raptors in 2023 will occur where they were seen in 2005-2010. A particular species might occur in the same type of environmental setting, but not necessarily in the same places.

UPDATING PROJECT IMPACT PREDICTIONS AND MITIGATION

The applicant is required by OAR 345-021-0010(1)(p) to provide "*information about . . . the fish and wildlife species . . . that could be affected by the proposed facility*" and is required by OAR 345-021-0010(1)(p)(A) to describe the "*biological and botanical surveys performed . . . , including a discussion of the timing and scope of each survey.*" In addition, the Wasco County ordinance at LUDO § 19.030.C.5 requires the applicant to "*[c]onduct biologically appropriate baseline surveys in the areas affected by the proposed energy facility to determine natural resources present and patterns of habitat use*," and to provide "*information pertaining to the energy facility's potential impacts and measures to avoid impacts on . . . all potential species of reasonable concern*," including species identified "*by any jurisdictional wildlife agency resource management plan adopted and in effect on the date the application is submitted*" (which would include bald eagles, golden eagles, federally designated migratory birds, and federal birds of conservation concern). Two such wildlife management plans per the Wasco County ordinance are the US Fish and Wildlife Service's Eagle Take Rule and the USA Eagle Conservation Plan Guidance (US Fish and Wildlife Service 2013).

In the 9 years since Northwest Wildlife Consultants (2010), I have studied baseline studies to assess their contributions to predicting and understanding wind project impacts (Smallwood 2017b, Smallwood and Neher 2017, Smallwood unpublished data). Baseline studies are intended to predict project impacts and formulate mitigation, and to set the stage for measuring project impacts. Baseline studies can predict project impacts by pursuing several objectives: (A) Identifying species present at a site, including species known to be vulnerable to wind turbine collision or displacement; (B) Quantifying abundance of species on site as a next-level assessment of collision risk; (C) Locating breeding sites to assess collision risk; (D) Quantifying behaviors on site, such as flight patterns and inferred objectives, e.g., foraging, mating, staging, stopping-over, migrating; (E) Characterizing spatial distributions of relative abundance and flight patterns to inform micro-siting for minimizing project impacts; and, (F) identifying opportunities for measuring project impacts and mitigation efficacy (Sinclair and DeGeorge 2016). However, baseline studies often suffer major shortfalls toward each of these objectives. Species presence can be difficult to confirm, requiring special survey methods and large time commitments; otherwise, determinations of species' absence are inappropriate and too often followed by documented fatalities at the operational wind project. Whether species are vulnerable to wind turbine collision depends on the likelihood of fatality monitoring methods detecting the species as fatalities in earlier monitoring efforts at other projects (Smallwood 2017). Whether species are vulnerable

to displacement has rarely been measured. If behavior data are collected as part of use surveys, the investigators rarely analyze the behavior data to assess collision risk or to inform micro-siting decisions. This latter shortfall is most critical because it goes to the only mitigation measure demonstrated to have minimized or reduced avian collision impacts (Smallwood 2008, 2009; Brown et al. 2016, Smallwood et al. 2017). As for identifying opportunities to measure impacts and mitigation efficacy, baselines studies rarely if ever address the experimental design constraints on testing mitigation efficacy or the statistical constraints associated with fatality estimation. They also never discuss the biological ramifications of fatality estimates in terms of demographic consequences or cumulative impacts. The Summit Ridge baseline study suffered these shortfalls and needs to be updated now that we know better.

Species Inventory

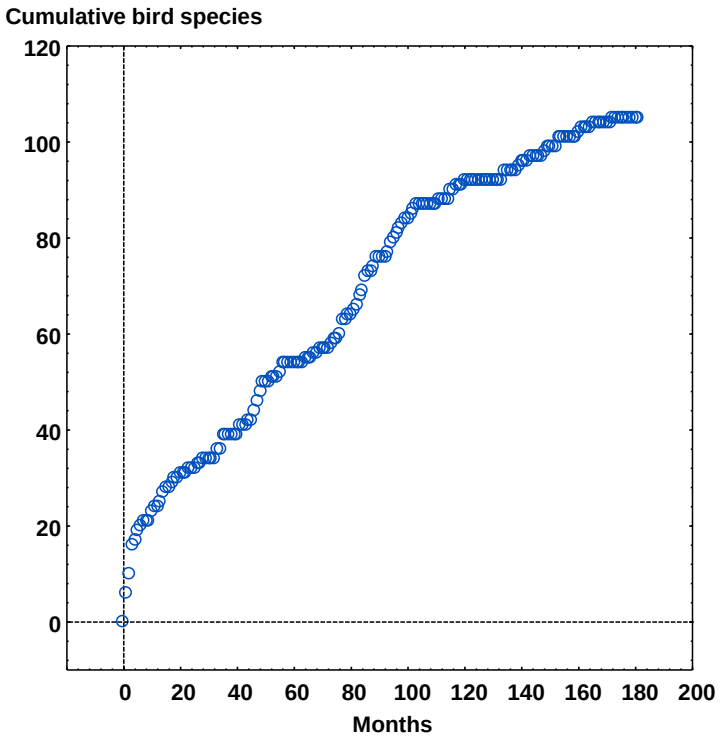
The US Fish and Wildlife Service (2012) recommends implementing survey methods that are appropriate for detecting the species.

Birds

Use surveys of the type performed at Summit Ridge were designed for detecting large birds, specifically large raptors. Additional survey methods are needed for an *inventory* of birds, including point counts for songbirds, focused surveys for burrowing owls, nocturnal surveys for owls, and call-back surveys for cryptic species. These various survey methods to meet the detection challenges of different species is what the US Fish and Wildlife Service (2012) meant by implementing survey methods appropriate to the species.

In my experience, bird species detected by use surveys at a project site increase in a typical pattern with additional survey efforts, so that the number of species yet to be detected can be predicted by a model fit to the cumulative counts of species already detected (Figure 6). It takes a great deal of survey effort to approach an asymptote in the number of species occurring at a site, and even in the case of the APWRA (Figure 6) there are bird species being killed by wind turbines that were never detected during use surveys. At Summit Ridge, because the data were not made available, I have no way of graphing bird detections against survey effort to assess whether the number of species detected was close to the number likely occurring at Summit Ridge. It is noteworthy, however, that Northwest Wildlife Consultants (2010) detected at least 55 species of birds in only 168 hours of survey over portions of two years. The 168 hours of survey at Summit Ridge equals about 7.5 months of survey effort in the APWRA, on average, so the survey effort at Summit Ridge detected nearly 3 times the number of bird species as detected in the APWRA for the same effort level, suggesting that additional survey effort would eventually tally a very large number of bird species. Given that the APWRA is notorious for avian collision fatalities, the larger number of species detected from a much smaller effort at Summit Ridge might portend large impacts. But there is more to collision risk than a simple species inventory.

Figure 6. *Cumulative bird species detected during use surveys at 84 stations approached an asymptote of about 110 species after 180 months of effort in the Altamont Pass Wind Resource Area, California.*



Not inventoried by the use surveys at Summit Ridge were the owls, goatsuckers, nocturnal migrants, or small or cryptic birds unlikely to be detected in use surveys. Due to the relatively small survey effort and the use of only one survey method, the baseline study includes more false-zero detections than it does bird species detections, and is therefore short of any sort of inventory. This is a pervasive problem among baseline studies performed across North American (Beston et al. 2015), and needs to be rectified at Summit Ridge.

Bats

The 2009 bat surveys (which are erroneously referred to by Tetra Tech (2018) as an "inventory" of bats) in the project area were severely limited by survey methodology, totaling 16 detector-nights over 4 nights at 6 stations. Not only were the bat surveys brief, they were constrained to bats that typically forage near the ground. In my experience using acoustic detectors for 4.5 months per year over 3 years, bat species composition differed between ground level and 80 m above ground, where the rotor hubs of modern wind turbines occur. Brown et al. (2016) detected 4 species of bats exclusively at ground level, whereas another 3 species were found at both heights. In other words, placing acoustic detectors near the ground can give the investigator a biased view of foraging or migrating bat species composition within a proposed project area. The surveys need to be repeated by placing acoustic detectors at heights within the planned rotor plane, but also using thermal-imaging cameras to count bats using the airspaces over various topographic settings, and by spanning a larger portion of the year.

After having studied bat activity in the APWRA for 7 years, including 940 hours on a FLIR T620 thermal imaging camera fitted with an 88.9 mm telephoto lens (Smallwood 2016, 2017), 3 years monitoring bat species via ground and wind turbine-based acoustic detectors (Brown et al. 2016), and many years of bat fatality monitoring, I recommend an update to the 2009 bat surveys. Understanding bat ecology is challenging due to bats' nocturnal activity, travel patterns, and cryptic roosting. This past year – my 7th year of monitoring bat migration through the APWRA – there was for the first time in my experience no migration (Smallwood unpublished data). One implication of this year's lack of migration through my APWRA study area is that an entire migration event can be missed by monitoring a site during a single migration season one year. If I had relied solely on 2018 thermal-imaging surveys over the migration season, I would have erroneously concluded that bats do not migrate through my study area. Such an error would have been profound. Similarly, Northwest Wildlife Consultants (2010) could easily have missed entire species of bat using the project area during the brief period of their 2009 surveys.

If, at the Vasco Winds Energy Project (Brown et al. 2016), we had relied on only one of three years of post-construction acoustic monitoring, and had we interpreted no detections as evidence of absence, as Tetra Tech (2018) and Northwest Wildlife Consultants (2010) did by characterizing the 2009 survey as an inventory, then we would have erroneously concluded that big brown bats (*Eptesicus fuscus*) were absent. But we detected this species in other years. Furthermore, preconstruction surveys detected 3 species of bat (*Myotis evotis*, *Myotis thysanodes*, *Lasiurus noctivagans*) that we never detected post-construction (Normandeau Associates Inc. 2011). Acoustic detectors have a range of about 30 m at best, or about 36% of the rotor-swept area of a modern wind turbine, not accounting for any obstructions. Detectors mounted 1.5 m above ground are limited in range to about 18% of the rotor-swept area of a modern wind turbine due to nearness to ground. An investigator relying on such detectors to characterize a bat community has to hope that members of all species of bats in the area will fly low to the ground and within a 30-m vertical ark of one of the detectors. Not only do members of each species have to visit these low-lying detector zones to be detected, but they have to echolocate or vocalize while doing so. Some species do not echolocate or vocalize as often as others, meaning that some species are more likely to be missed in acoustic detector surveys (Sinclair and DeGeorge 2016). Acoustic detection of bats has brought highly valuable data to investigators, but its limitations must be recognized. I would need a very large acoustic detector survey effort involving placements at multiple heights above ground before concluding the bat community had been inventoried.

A biased view of bat species inventory, as well as collision risk, can also emerge from focusing surveys into one season of the year, as did Northwest Wildlife Consultants (2010). It is widely known that bat foraging activity peaks either in summer or fall, depending on location. The largest peak activity period in the APWRA has been during the last week of September and first week of October, which is later than most locations in North America that we know of. But by monitoring year-round, I also documented an activity peak in April, and I continued to see large bats (hoary bats) through spring and

summer. Hoary bats also have been found dead at APWRA wind turbines from spring through fall. During preconstruction acoustic detector surveys at Vasco Winds, Normandeau (2011) documented bats year-round, as well as shifting compositions of bat species detected each season. Rather than restricting bat surveys to a narrow portion of a year based on an assumed peak in activity, surveys should be performed year-round to discover unique activity patterns at the project site.

I recommend an expanded survey effort for bats, especially if the objective is to determine an inventory of bat species. Between the Normandeau (2011) and Brown et al. (2016) studies at Vasco Winds, it took 475 detector-nights per detection of western long-eared myotis and 285 detector-nights per detection of fringed myotis. Even for silver-haired bat, we needed 5 times the number of detector-nights (79) than the 16 used at Summit Ridge to detect this species. Sixteen detector-nights is highly unlikely to yield an inventory, especially at ground level.

Based on the average detector-nights per detection of species (Figure 7), had Brown et al. (2016) relied solely on 16 detector-nights, we would have failed to detect 83% of the species that we actually detected. According to the model that best fits the data in Figure 7, we should have detected 12 species of bats after the 1,425 detector-nights used in the studies, so we likely missed two species. Assuming this model would be applicable to Summit Ridge, 16 detector-nights should have detected 2 or 3 species of the 15 or so potentially present, but Northwest Wildlife Consultants detected 7 species, or more than predicted. A possible explanation for the more-than-predicted detections was Northwest Wildlife Consultants' (2010) selection of study locations thought more likely to be used by bats, whereas the studies at my project site location were selected based on met tower availability or wind turbine sites. Nevertheless, Northwest Wildlife Consultants did not truly inventory bat species at Summit Ridge, nor did they identify bat species or quantify their activity levels within the airspaces likely to be swept by wind turbines. A survey effort is needed in the airspaces that will be affected by wind turbines.

Related to the objective of identifying species present at a site, there is the objective of identifying species known to be vulnerable to wind turbine collision or displacement. Northwest Wildlife Consultants (2010) addressed this objective by listing average fatality rates of bat species having been recorded as fatalities at Pacific Northwest wind projects. The problem with this is that we now know how unlikely it was for all bat fatalities to have been found and recorded, especially fatalities of smaller-bodied species of bats. Based on a detection trial integrated into a 7-day fatality search interval out to 105 m from 2.3-MW wind turbines mounted on 80-m towers, carcass detection rates would be 1.6% for small-footed myotis (Figure 8, predictive model from Brown et al. 2016). Given the longer search interval used at Pacific Northwest wind projects cited by Northwest Wildlife Consultants (2010), detection rates would have been even lower, likely requiring hundreds of bat fatalities before a single one was found. Until skilled scent-detection dogs are widely used in bat fatality searches at wind projects and the results shared with the public, it will remain unknown which of the bat species might be

more vulnerable to wind turbine collision (see the findings of Mathews et al. 2013 and Smallwood et al 2018 – Attachment 1).

***Figure 7**. Cumulative bat species detected in acoustic surveys increased with detector-nights per detection, based on 1,425 detector-nights at Vasco Winds Energy Project, 2010-11 (Normandeau 2011) and 2012-14 (Brown et al. 2016).*

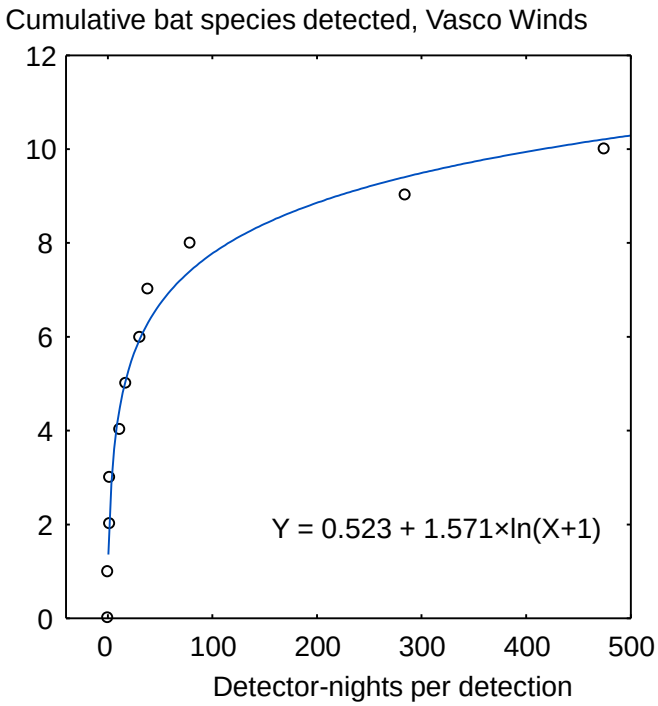
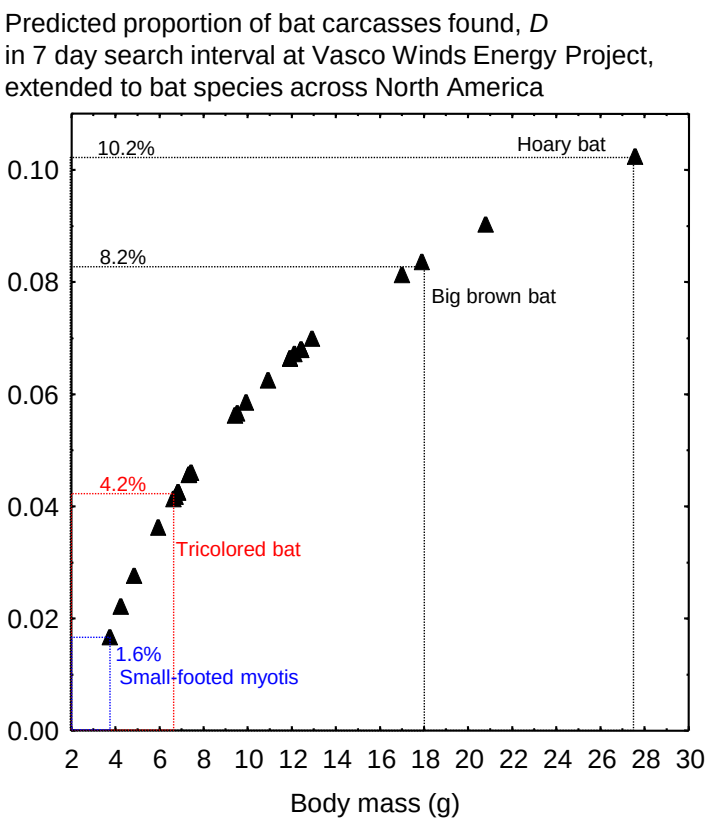


***Figure 8**. A model was fit to carcass detection rates, D, regressed on body masses of nearly 200 frozen-fresh bats of multiple species that were thawed and placed over three years in fatality search areas around monitored wind turbines in the Altamont Pass Wind Resource Area. The model was then projected to North American bat species based on body mass typical of each species.*



Relative Abundance

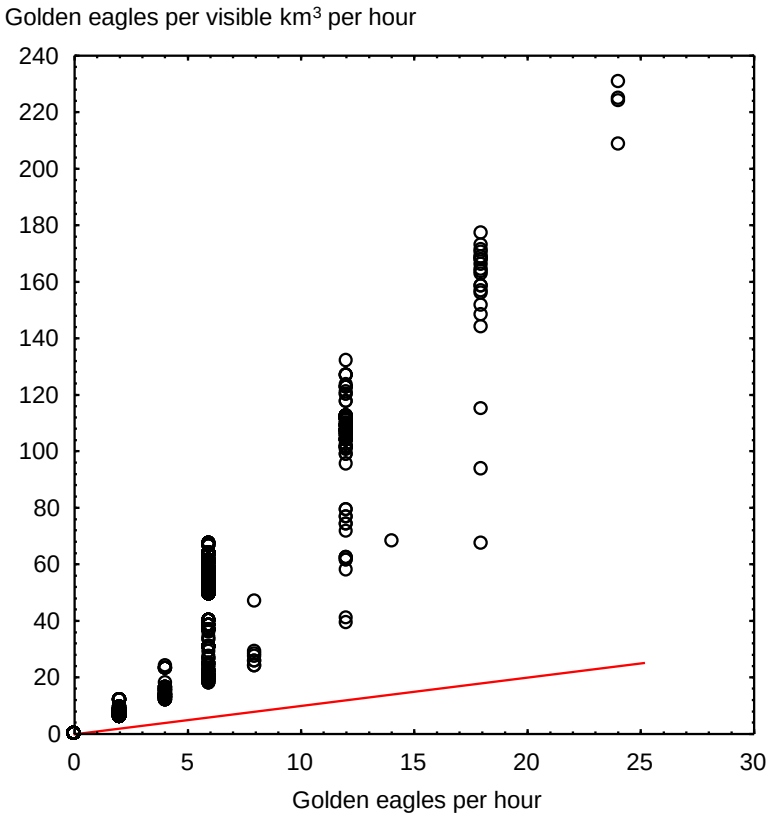
Wasco County LUDO § 19.030.C.5.b requires the applicant to conduct "*biologically appropriate baseline surveys in the areas affected by the proposed energy facility to determine natural resources present and patterns of habitat use*" and LUDO § 19.030.C.5.c requires the applicant to select turbine "*locations to reduce the likelihood of significant adverse impacts on natural resources based on expert analysis of baseline data*."

The USA Eagle Conservation Plan Guidance (US Fish and Wildlife Service 2013) recommends 40 hours of relative abundance or use surveys per station covering at least 30% of the project's footprint. To be consistent with this recommendation, the 10 use-survey stations at Summit Ridge would have needed 400 hours of surveys instead of the 168 hours completed. Based on what has been learned in the APWRA, I contend that more hours are needed than the 400 recommended by US Fish and Wildlife Service (2013). Also based on what has been learned in the APWRA, I contend that more years of surveys are needed than the 2 years recommended by US Fish and Wildlife Service (2013). Species composition and species' activity areas shift inter-annually to a degree that cannot be captured by only 2 years.

As earlier illustrated in Figures 1 through 5, use rates shift spatially and inter-annually, so use rates estimated in one year cannot be expected to represent use rates 14 years hence. As an example of how things change, bald eagles – a species protected under the federal Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act – were not expected by the Alameda County Scientific Review Committee to be at risk of wind turbine collision in the Altamont Pass because use surveys rarely reported bald eagles in the Altamont Pass through 2011. Since 2011, however, bald eagles have been seen in increasing numbers. Last week I saw 3 bald eagles in 2 days in the Altamont Pass. A few years ago I found one dead under a wind turbine. Tetra Tech (2018:36) expects that Summit Ridge will not affect bald eagles, but I suggest that appropriate surveys might lead to an altered expectation. (Tetra Tech also claims in their Table 2 that bald eagles eat carrion in the upland environment, but in my experience they also catch and consume live prey just as golden eagles do.)

The use rates I compared in Figure 2 had been adjusted because we learned since 2010 that use rates are functions of maximum survey radius and they vary according to the proportion of the sky that is visible from any given observation station (Figure 9). As field biologists are asked to survey to greater distances, they miss increasingly larger proportions of the available birds, more so for small-bodied bird species than large-bodied species. As illustrated in Figure 9, these functions are biases if they are not quantified and accounted for in the use-rate metric (Smallwood and Neher 2017, Smallwood 2018). In Figure 9, the highest golden eagle use rates adjusted for occluding terrain were 11 times higher than without the adjustment. Without accounting for these biases, use-rate comparisons are potentially misleading, both between projects and within a project area when using the data to carefully micro-site the turbine layout with the intention of minimizing collision impacts.

Figure 9. *Golden eagles seen flying per visible km³ per hour increased faster than proportionately with increasing golden eagles seen flying per hour among the APWRA's 84 observation stations monitored 2005-2011. The red line depicts theoretical equivalency between the use rates had there been no effect of visual obstruction.*



Two of the three metrics measured by Northwest Wildlife Consultants (2010) were almost entirely functions of the distance bias discussed above. Smaller birds are seen less often than larger birds for the simple reason that many individuals of smaller-bodied species are either not seen or are seen but not identified to species due to being located too far from the observer. Percent composition is deeply confounded by this distance bias, and therefore does not represent the species true contribution to the total number of birds on a 201-hectare survey plot. According to Table 6 of the Baseline Study, common ravens were 21 times more abundant than savannah sparrows and 6.6 times more abundant that American goldfinches. I question these results because I know from experience that common ravens are easy to see (and hear) out to 800 m from the observer, whereas savannah sparrows and American goldfinches, unless accompanied by calls, are much more difficult to detect and identify. Assuming the American goldfinches and savannah sparrows were seen within 50 m of the observer, which is a generous assumption, the relative abundance estimated for these species would need to be extrapolated to the additional 200.175 ha of the survey plot to account for those members of each species too far away to be seen or identified, resulting in relative abundance estimates about 250 times greater than reported. The third metric, percent frequency, suffers the same confounding from plot size as do the other metrics, and is therefore just as misleading without any adjustment for the distance effect.

Use surveys to 800-m boundaries are fraught with species identification errors. McClure et al. (2018) compared human detections of eagles to automated detections out

to 1,000 m and found through photo documentation that the biologists misidentified 32% of large birds as eagles. Human misidentification of large birds as eagles increased 26% for every 100 m added distance from the observer, and the median distance of bird detections was <400 m (McClure et al. 2018). Additional errors at long distances include estimation of the bird's height above ground (Stanek 2013) and determining whether the bird is within or outside the maximum search radius. Using maximum survey radii >400 m hurts any micro- or macro-siting model development more than it helps due to the large error rates.

Not only was the maximum survey radius too far for the stated objectives of the use surveys, but the survey stations were too few to encompass many of the then-planned wind turbine sites in the surveyed airspace. If the analysts are not going to use behavior patterns to highlight locations of likely collision impacts, then passage rates through the airspace of planned or potential wind turbine locations could inform of collision risk and help guide micro-siting (Smallwood 2017). Of the then-planned 86 turbine sites, however, only 28 (32%) were within surveyed airspace, only 13 (15%) were within 400 m of the observers, and only 7 (8%) were within 200 m of the observers. Thus, only 8% of the project could be assessed for collision risk to birds the size of American kestrels and only 15% of it could be assessed reliably for birds to the size of eagles. Most of the relative abundance quantified by Northwest Wildlife Consultants (2010) was at locations other than where wind turbines would be constructed.

Also missing from reports of use surveys in the Baseline Study were any of the types of statistics that accompany fatality rate estimates, such as standard error and confidence ranges. In fact, there was no handling of error at all, as if measured use rates represented true use rates. Because there were no error terms accompanying the estimates of mean use rates, there was no carrying of error terms through the calculation of use rates. Without error terms, birds with high use rates were compared to birds with low use rates without acknowledging that as use rates diminished, uncertainty in the accuracy of their use rates likely increased. This is a strange omission because estimated use rates likely carry larger error terms than do fatality estimates. Northwest Wildlife Consultants (2010) compared fatality rates and use rates as if error did not exist for either metric.

Nor was the reader of the Baseline Study informed of potential biases caused by imbalance in start times per observation station, although the reader was informed of imbalance in seasonal representation. No ceiling was specified for inclusion of birds in use rate estimates, as if birds flying 900 m above ground were included along with birds flying 60 m above ground. And as pointed out earlier, there was no adjustment for variation in how much airspace was visible from one station to the next, and no adjustment for the proportion of birds unseen due to the effect of the long survey distance used.

Bats

The Habitat Mitigation Plan has yet to be informed by measured relative abundance of bats, but it should be. The surveys performed in 2009 appeared to be intended for identifying which species of bat occur at the project site, but even for that purpose the survey effort was insufficient (as noted earlier). But a question long in need of an answer is whether relative abundance of bats can predict post-construction fatality rates of bats. A follow-up question has been whether pre-construction activity patterns of bats can be used to guide micro-siting to minimize bat collision impacts.

Hein et al. (2012) tested for a correlation between post-construction fatality rates and pre-construction use rates based on acoustic detectors placed in proposed wind projects, but found no significant correlation. Hein et al.'s (2012) disappointing result might have been influenced by the same type of inter-annual variation in relative abundance as I have noted for birds, or it could have been caused by inadequate research methods; it remains unknown why a significant correlation was not found. My colleagues and I decided to try testing for a correlation by quantifying passage rates through turbine rotors using a thermal-imaging camera and relating these passage rates to the results of fatality searches performed much closer to the time of the passage rate surveys, and we used dogs as the fatality searchers.

We found that bat fatality finds *did* correlate with the previous night's relative abundance (Figure 10), but our model predictions of fresh bat fatality finds were more responsive to higher rates of near misses with wind turbine blades and even more so with observed collisions (Figure 11). But whereas we established that observed risky situations do indeed translate into fatality finds, we still do not know whether we can predict fatality rates at candidate turbine locations based on preconstruction use surveys. A possible reason for potentially being unable to predict fatality rates of bats at the turbine scale is because bats are attracted to wind turbines (Smallwood 2016). I have seen many bats go out of their way to visit wind turbines and often fly through the operating rotors repeatedly. Interestingly, when the turbines are turned off or not operating, bats largely lose interest in them and passage rates decline (Smallwood unpublished data). When turbines are shut down, fatalities of bats ceased (Smallwood and Bell, In prep.). Even if not for predicting impacts at a specific project such as Summit Ridge, the magnitudes of bat impacts are so great that preconstruction bat surveys are warranted for research value. In the meantime, fatality rates at other wind projects likely serve as the best predictors of bat impacts at Summit Ridge, so long as the data from other projects were collected using dogs or search intervals of <10 days.

Figure 10. *Odds ratio (95% CI) of finding at least 1 bat dead ≤3 days logit-regressed on the number of previous-night bat passes through rotors of the same wind turbines searched by dogs for fatalities at Golden Hills and Buena Vista Wind Energy projects, 20 September through 26 October, 2017. Data were from Smallwood et al. (In prep.).*

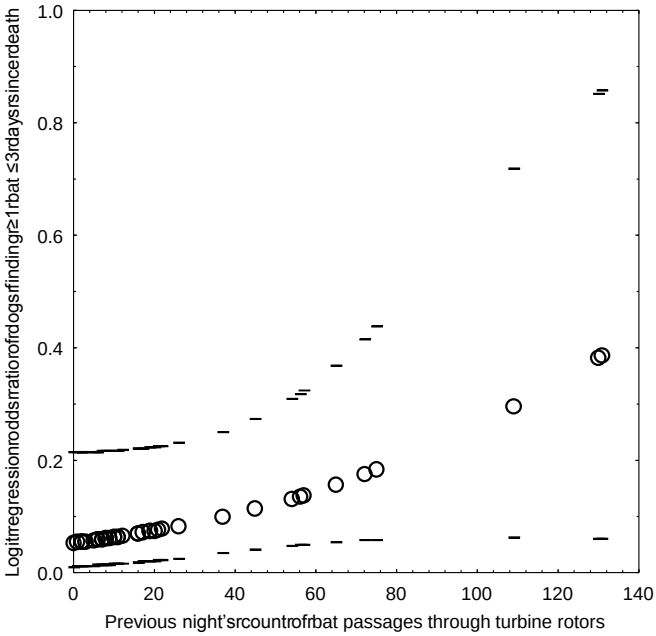
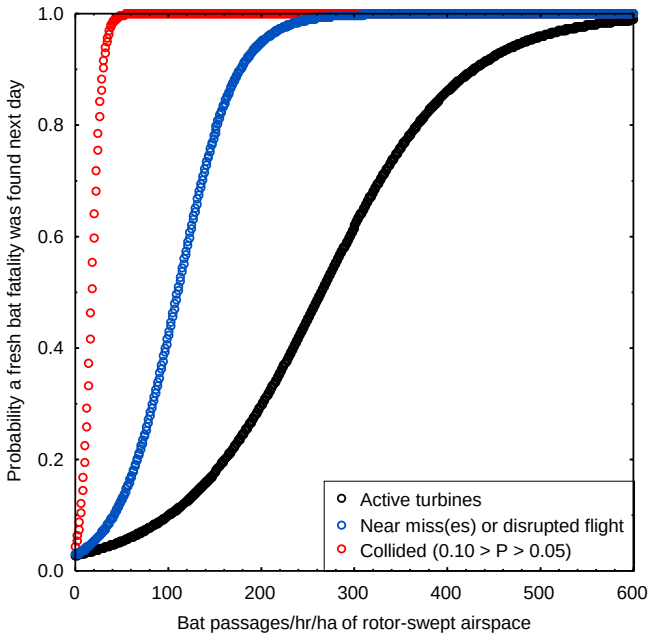


Figure 11. *Logit-regression model predictions of the odds of dogs finding fresh bat fatalities the morning after thermal-imaging survey-counts of bats passing through active turbine rotors (black), bats nearly colliding or experiencing disrupted flights due to pressure waves of passing blades or wake turbulence (blue), and bats seen colliding with a blade (red) in California's Altamont Pass Wind Resource Area, 15 September through 15 November 2017. Data were from Smallwood et al. (In prep.).*



Behavior Data for Micro-siting

Micro-siting to minimize collision impacts has obviously not been attempted for this project, yet such information should have been provided in the application materials pursuant to OAR 345-021-0010(1)(p)(G) and Wasco County LUDO §§ 19.030.C.5.c and 19.030.C.5.h. To assist with micro-siting to minimize collision impacts, the US Fish and Wildlife Service (2003) had prepared guidelines that identified terrain features and environmental settings to avoid. Here, the application materials provide no indication

that micro-siting to minimize collision impacts took place. The crude map of 86 turbine locations in the Baseline Study (Northwest Wildlife Consultants 2010) shows regular spacing between turbines along Summit Ridge, as did the partial map attached to a 21 April 2016 email from Arthur Smith to Peter Ostrowski (in Attachment B: Reviewing Agency Comments on Preliminary Request for Amendment 4). In my experience, regular spacing results in some wind turbines installed on ridge saddles, breaks in slope, and other terrain settings that happen to coincide with regular spacing. Wind turbines on these terrain features will result in disproportionate collision rates at those turbine sites – collision rates that could be avoided.

No matter the layout iteration, I have seen no evidence of an effort to avoid landscape features long known to associate with more collision fatalities, including features identified in the original federal guidelines for minimizing wind energy impacts on wildlife (US Fish and Wildlife Service 2003). The map of use survey stations in Northwest Wildlife Consultants (2010) was overlaid on a turbine layout, suggesting that the layout at the time had been decided before any use surveys were performed. Using Google Earth to examine some of the planned sites in the Arthur Smith email of 21 April 2016, it appears to me that some wind turbines are planned for ridge saddles, ravines, and relatively low-lying portions of ridge structures. This is unfortunate because we know that careful micro-siting is the most effective mitigation measure available for minimizing wind project impacts to raptors (Attachments 2 and 3).

A change to the layout was proposed in 2014, increasing tower height to 91 m and turbine size to 2.7 MW, and reducing the number of turbines from 87 to 75 or 72. Rick Gerhardt of Northwest Wildlife Consultants was asked to assess changes to wildlife risk resulting from the change in turbines, which he did by email to Steven Ostrowski and Eric Desmarais on 8 August 2014. Gerhardt replied that it was intuitive that the taller tower and larger rotor would kill more birds and bats, but that the increased collision risk posed at the individual turbine level would be more than offset by decreased collisions with fewer turbines and reduced impacts on habitat. In my experience, intuition has not served biologists well when it comes to impact predictions at wind projects, but the important point here is that no consideration was given to where the larger turbines could be sited to minimize collision risk. With fewer wind turbines needed to meet the project's capacity goal comes the opportunity of more space to carefully micro-site the turbines to avoid terrain features known to associate with more collisions and areas where behavior data suggest are disproportionately trafficked by birds and bats (Smallwood 2017c). By not suggesting micro-siting of the larger turbines to minimize collision risk, Gerhardt's 2014 reply email indicates again that this approach was not part of the baseline study for the project. Because micro-siting to minimize collision impacts was not an objective of Northwest Wildlife Consultant's (2010) baseline study, the data needed for micro-siting were not collected.

Behavior data are needed to inform micro-siting to minimize collision fatalities. Northwest Wildlife Consultants (2010) reportedly recorded behavior data, but only once per flight path. Behaviors need to be mapped at frequent intervals along a flight path (Smallwood 2017b, Smallwood et al. 2017). This type of data can be used to develop

collision hazard models useful for micro-siting, or they can be used as empirical support for expert micro-siting decision-making. Ample evidence suggests that this general approach can minimize avian collision mortality (Brown et al. 2016, Smallwood et al. 2017; Attachments 2 and 3; Figures 12 and 13). Figure 12 shows how map-based collision hazard models performed in the APWRA, where Hazard Class 1 included wind turbines on landscape settings predicted safest and Hazard Class 4 included wind turbines on landscape settings predicted most dangerous. Class 1 tended to compose 63% of the landscape, Class 2 about 20%, Class 3 about 12% and Class 4 about 5%. The wind turbines in Hazard Class 4, composing 5% of the landscape, caused fatality rates 4 times higher than wind turbines in Hazard Class 1 for golden eagles, 1.5 times higher for red-tailed hawks, 3.4 times higher for American kestrels, and >6 times higher for burrowing owls. Work still needs to be done to improve collision hazard models for red-tailed hawk, although expert opinion tends to work well for this species. I should also note that the model for golden eagles also made use of telemetry data and landscape attributes associated with wind turbine fatality finds. The burrowing owl model made use of fatality finds as well as landscape attributes associated with breeding sites.

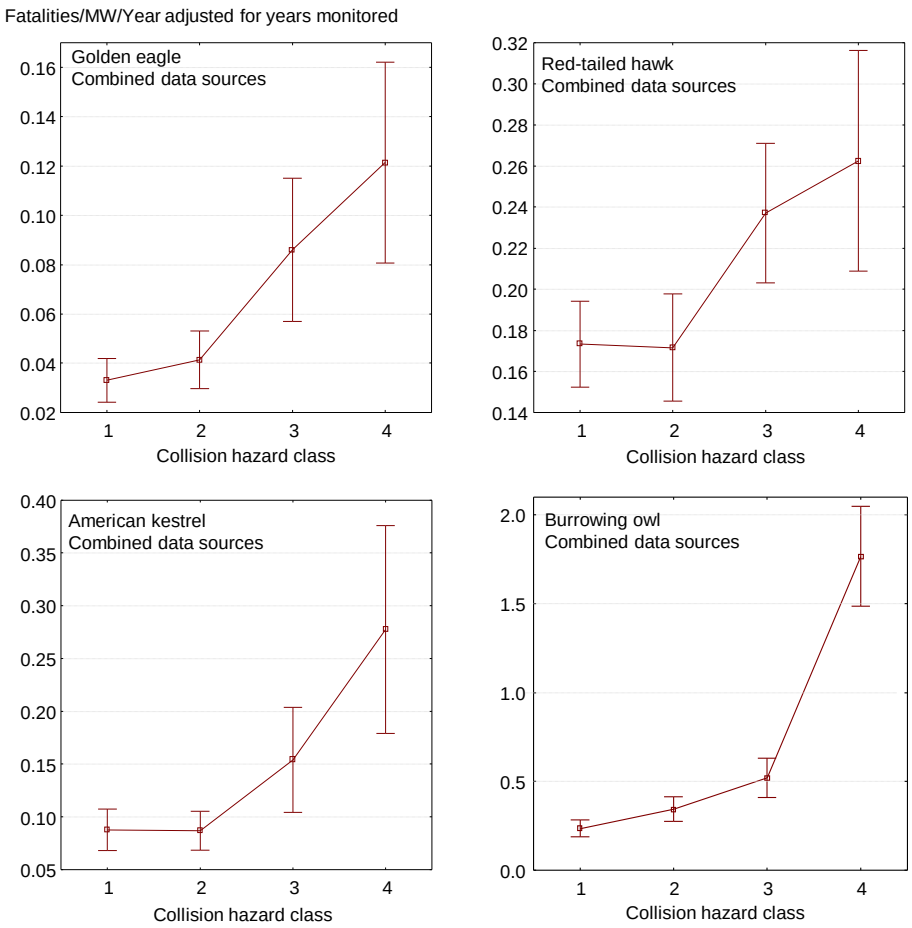


Figure 12. *Mean and 95% CI fatality rates of golden eagle, red-tailed hawk, American kestrel, and burrowing owl in response to model-predicted collision hazard classes 1 through 4, where 1 was least hazard, and 4 greatest hazard in the Altamont Pass Wind Resource Area.*

Figure 13. *Golden eagle fatalities per turbine relative to (top) SRC style hazard ratings binned 4 = 3 to 5, 6 = 6 and 6.5, 7 = 7 and 7.5, 8 = 8 and 8.5, and 9 = 9 and 9.5; (middle) Grading within 40 m of the turbine leaving cut slopes or berms of 0 = none, 1 = 1-3 m, and 2 = >3 m; (bottom) Combined indicator of SRC-style hazard rating, grading impact and whether low on declining ridge or within saddle or valley structure. The combined indicator was the sum of the binned SRC rating divided by 9, the binned grading impact weighted by half, 1 for sites low on ridge and 1 for sites within saddle or valley structures, and this sum was binned as 1 = 0 to 1; 2 = 1 to 2; 3 = 2 to 2.8, and 4 = >2.8. I note that I applied SRC-style hazard ratings to 6 turbine addresses post-construction because these turbines had been relocated far from original sites during the planning process. These data were from the first year of fatality monitoring at 48 wind turbines in the Golden Hills project.*

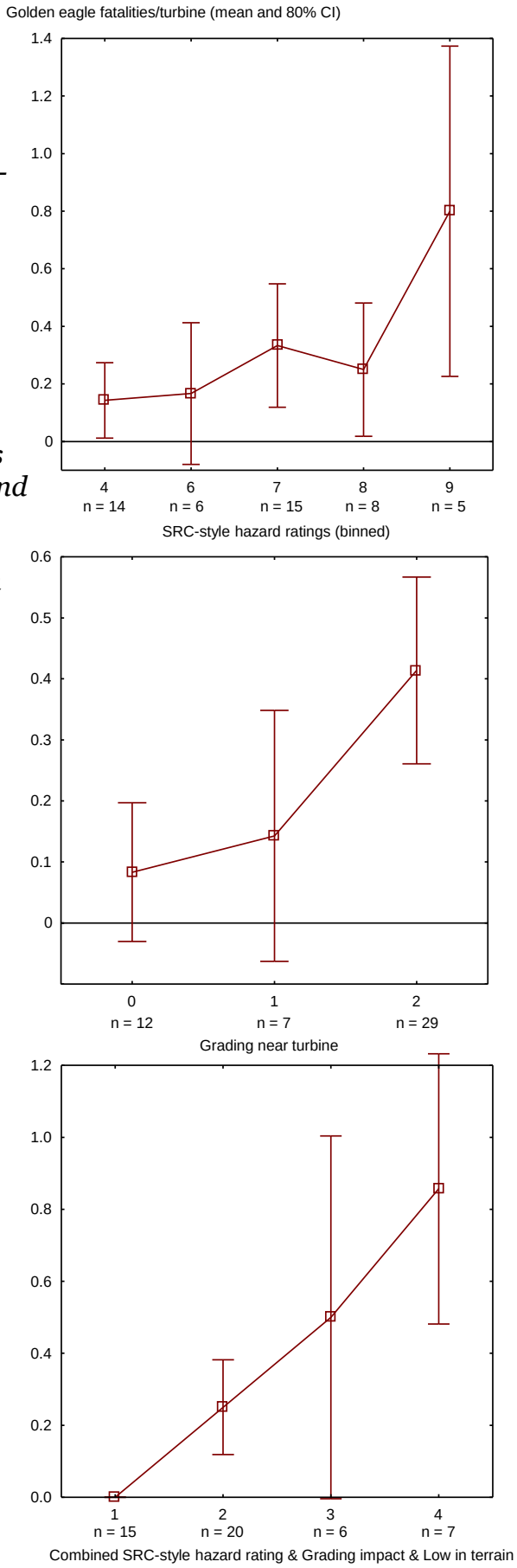


Figure 13 shows how golden eagle fatality rates varied among 48 modern wind turbines rated for landscape contributions to collision threat based on expert opinion (SRC-style ratings), levels of grading for the turbine pad and access roads, and a combination of expert opinion about the landscape setting and degree of grading. An emerging issue is the contribution of grading for turbine pad and access roads to subsequent wind turbine collision risk. Pads cut deeply into slopes can leave berms in the prevailing upwind aspect of turbine rotors, effectively reducing the space between the low-reach of the blades and the height above ground a bird needs to clear above the berm (Figure 14). This grading can also increase turbulence that birds or bats will experience as they fly from air above matrix slope conditions to air above a graded pad (Attachment 3). Wind speeds over such pads can drop radically, and wind directions can change. In addition to micro-siting to minimize collision risk, micro-siting to minimize grading should be an objective.

Figure 14. *This view is toward the prevailing wind (see broad white arrow), so the prevailing upwind slope, the crest of which is only 30 m from the wind turbine, forces any bird or bat passing over it into a vertical gap of only 16 m between the hill crest and the low reach of the blade. The wind turbine's dimension of 29 m height above ground of the low reach of the rotor has lost its meaning due to the effects of grading of a pocket into the slope. I have seen this type of grading across the western USA.*

The application and Habitat Mitigation Plan need to be revised to incorporate the most effective mitigation measures, including wind turbine micro-siting, based on current

data, to minimize collision hazards to birds and bats. To this end, appropriate studies need to be performed.

Nest Locations

The applicant is required by OAR 345-021-0010(1)(p), and (1)(p)(A) through (1)(p)(H) to survey the current locations of nests for raptors and sensitive birds in order to ensure the protection of these species and their habitat. In addition, the applicant is required by Wasco County LUDO § 19.030.C.5.h to reduce impacts by "*[a]voiding construction activities near raptor nesting locations during sensitive breeding periods and using appropriate no construction buffers around known nest sites*." In addition, nest locations can often inform about "*patterns of habitat use*" and potential project siting "*locations to reduce the likelihood of significant adverse impacts*," which are required by Wasco County LUDO §§ 19.030.C.5.b and 19.030.C.5.c, respectively.

Northwest Wildlife Consultants (2010) compared raptor nest density at Summit Ridge to raptor nest densities and raptor fatality rates measured at other Pacific Northwest wind projects where both of these metrics had been measured. Lumping species together to measure nest density and fatality rate introduced multiple problems that were ignored by Northwest Wildlife Consultants. Raptor species vary in nest density and in fatality rates. By lumping species for their comparison, Northwest Wildlife Consultants washed out any species-specific relationships between nest density and fatality rates, and they made no effort to manage the error terms associated with each species. If I were to repeat the assessment approach of Northwest Wildlife Consultants (2010) in the Altamont Pass, I would have to combine, among other species, the 2 or 3 golden eagle nests with the 25 to 50 or so red-tailed hawk nests and the 537 (90% CI: 320-753) burrowing owl nests when measuring raptor nest density. My raptor nest density would obviously be dominated by burrowing owl nests, and so would my raptor fatality estimate. Lumping species for this type of assessment is not a good idea.

When investigators appropriately examine relationships of nest location with wind turbine fatalities, they consistently document harmful outcomes (Hunt e al. 1998, Pearce-Higgins et al. 2009, Dahl et al. 2012, Loesch et al. 2012). In my own studies I found that burrowing owl nest location turned out to be a key predictor variable in my burrowing owl collision hazard model in the Altamont Pass. A common thread among these studies is their simultaneous measurement of nesting locations and wind turbine impacts. This simultaneity is important because birds are not as tenacious about nesting in the same place from year to year as some people might believe. Just as shown in my Figure 1, the locations of entire burrowing owl nesting colonies shift inter-annually, and in studies where I have focused on individual nest sites, I found that these also shift use inter-annually (Smallwood and Morrison 2018). Doug Bell and I have been tracking the nest locations of a pair of prairie falcons, which change locations from one year to the next in the APWRA, one year nesting in a rock cave in Vasco Caves Regional Preserve, the next year nesting in a derelict Howden turbine nacelle, then returning to a different rock cave in Vasco Caves, and then nesting in a derelict Micon turbine nacelle on the east side of the Altamont Pass. Nesting sites are not static.

The nest surveys at Summit Ridge support my point that nest distributions are dynamic. Species composition of on-site nesters changed considerable between 2009 and 2016 (Northwest Wildlife Consultants 2010, 2016). Northwest Wildlife Consultants found 5 species of raptor in 2009 but only 1 species of raptor in 2016. They found twice as many red-tailed hawk nests in 2009 as they did in 2016. They reported a map of red-tailed hawk nests in 2009 that looked nothing like the map of nests in 2016; the spatial distribution had changed completely, except perhaps for underlying environmental conditions at the nest sites.

Planning a wind project layout to buffer nest sites previously mapped in one particular year – say in 2009 or 2016 – will do little to minimize impacts when nest sites of those same birds or some future generation of birds nest at different sites. A more effective approach is to map breeding sites over several years and then model nest site selection for use in micro-siting. This was how we developed an effective collision hazard model for burrowing owls in the Altamont Pass. Knowing the types of places where a particular species tends to nest is more useful than relying on a 2009 or 2016 map of nest sites. An appropriate nest site survey is needed at Summit Ridge, and it needs to be interpreted appropriately.

PREDICTING IMPACTS

The applicant is required by OAR 345-021-0010(1)(p) to provide "*information about . . . the fish and wildlife species . . . that could be affected by the proposed facility*" and is required by OAR 345-021-0010(1)(p)(F) to provide "*[a] description of the nature, extent and duration of potential adverse impacts on the [identified habitat] and [identified sensitive species] that could result from construction, operation and retirement of the proposed facility*." In addition, the Wasco County ordinance at LUDO § 19.030.C.5 requires the applicant to provide "*information pertaining to the energy facility's potential impacts and measures to avoid impacts on . . . all potential species of reasonable concern*," and this information must *"[t]ak[e] into account mitigation, siting, design, construction, and operation [of] the energy facility*."

As a first step, the proposed mitigation measures need predictions of collision fatalities per species of bird and bat. Appropriate mitigation cannot possibly be planned effectively without first knowing the potential impacts. Imagine trying to plan mitigation for impacts of a natural disaster on personal property without knowing the value of the personal property or the potential magnitude of damage caused by the disaster. The Habitat Mitigation Plan, as written, poses the same problem for birds and bats at Summit Ridge because it remains unknown how many of each species of bird and bat would be made vulnerable to wind turbine collisions, and it remains unknown how many might be killed by wind turbine collisions, collisions with transmission lines, or other elements of the project. Potential impacts are not entirely unknown, however, because impacts have been measured at other wind projects, providing a starting point for defining a range of possible outcomes.

The Baseline Study did not predict collision fatality impacts, other than to conclude that impacts would be low for every taxonomic group addressed. Northwest Wildlife Consultants (2010) compared reported fatality rates from other Pacific Northwest wind projects, but did not project the mean fatality rates from those projects to Summit Ridge – an easy and obvious step. Or was it? Although Northwest Wildlife Consultants laid out wind project attributes from which the fatality rates were drawn – such as wind turbine size, tower height, blade length and so on – they did not lay out the fatality monitoring attributes that bear on variation in estimated fatality rates. These fatality monitoring attributes can influence fatality estimates more than the true number of fatalities, and include monitoring duration search interval, inter-transect spacing, maximum search radius, carcasses used in detection trials, detection trial duration, the types and condition of trial carcasses used, and whether humans or skilled detection dogs were used as searchers (more on these attributes later, when I comment on post-construction monitoring, but also see Smallwood 2007). So to answer my earlier question, no, extrapolating reported fatality rates from Pacific Northwest wind projects to Summit Ridge is not a simple and obvious step. Reported estimates should be compared at face-value.

I took on the challenge of estimating new fatality rates from every wind project where monitoring results were publicly reported through 2012. The challenge was to obtain comparable fatality rates, using the same suite of assumptions and analytical methods for all of them. There was no way that I could remove all of the unique influences of individual studies, especially those related to carcass detection trials, but my estimates were much more comparable than the originals (Smallwood 2013). Based on wind projects where the average fatality search interval was <10 days, predicted bat fatalities at Summit Ridge is 7,620 with an upper-bound prediction of >11,000 bat fatalities (Table 2). The two sensitive species of bat in the project area for which fatality estimates existed somewhere in North America by 2012 were hoary bat and silver-haired bat, predicted to be killed by the Summit Ridge project at the rates of 527 hoary bats and 342 silver-haired bats per year. If these rates continued through 30 years of operations, the project will have killed about 15,810 hoary bats and 10,254 silver-haired bats.

Applying the 2012 national averages (Smallwood 2013) to the Summit Ridge capacity and assuming no micro-siting to minimize collision impacts, the averages predict at least 2.7 eagles per year, or at least 81 eagles after 30 years of operations. For burrowing owls the averages predict 15.4 fatalities per year, or 462 after 30 years. For all raptors the averages predict 119 per year or 3,579 after 30 years. For all birds as a group, the averages predict 1,454 fatalities per year, or 43,611 after 30 years. Relative to the biology of each taxonomic group, none of these predicted numbers are small, and all should be carefully considered. Any project beginning operations in 2023 should not rely on baseline use surveys conducted in 2009.

Table 2. *Predicted fatality rates of Oregon's and the nation's sensitive species at Summit Ridge, based on estimated mean and 90% CI fatalities/MW/year in 2012 (Smallwood 2013), and assuming 2.7-MW turbines would be installed without any careful micro-siting. I represents search interval.*

Taxa	Predicted fatalities/MW/year		
	Mean	**90% LB**	**90% UB**
Bats, *I* < 10 days	7,620.5	4,179.6	11,061.4
All raptors	119.3	15.4	216.5
All birds	1,453.7	24.9	2,401.2
Long-billed curlew	0.2	0.0	0.4
Bald eagle	0.2	0.0	0.0
Golden eagle	2.5	0.7	4.3
Ferruginous hawk	0.4	0.0	0.9
Swainson's hawk	1.0	0.0	1.7
Burrowing owl	15.4	0.9	25.2
Common nighthawk	4.0	0.0	6.0
Lewis's woodpecker	0.2	0.0	0.4
Grasshopper sparrow	0.4	0.0	1.0
Brewer's sparrow	1.5	0.0	2.9
Hoary bat	527.2	90.3	641.1
Silver-haired bat	341.8	41.1	330.2

Cumulative Impacts

In order to successfully analyze and prevent adverse impacts to wildlife species, cumulative impacts must be assessed. For this project, however, the most recent avian use surveys were performed in 2009. I must point out that circumstances have changed substantially since then. One changed circumstance includes USA wind energy's 2.75-fold increase in installed capacity from 35,128 MW in 2009 to 96,488 MW by 2018 (https://www.awea.org/wind-101/basics-of-wind-energy/wind-facts-at-a-glance, last accessed 14 February 2019). This increase in installed capacity has translated into an increase in cumulative effects to bats and birds, including to threatened and endangered species. Regressing installed capacity on the number of years since 2007 (2007 was the beginning of a linear increase in capacity through the present time) results in a model that predicts 131,351 MW by the requested end of project construction in 2023 ($r^2 = 1$, $P < 0.0001$). My 2012 nationwide fatality estimates (Smallwood 2013, Smallwood and Neher 2017) applied to the 2009 installed capacity and also projected to the 2023 installed capacity yields very different cumulative impacts, averaging about 3.74 times greater in 2023 than they did in 2009 (Table 3).

Table 3. *Predicted fatality rates nationwide based on estimated mean and 90% CI fatalities/MW/year in 2012 (Smallwood 2013).*

Taxa	Predicted fatalities/MW/year					
	2009			2023		
	Mean	90% LB	90% UB	Mean	90% LB	90% UB
All bats, I<10 days	1,377,018	755,252	1,998,783	5,148,959	2,824,047	7,473,872
All raptors	21,562	2,786	39,119	80,623	10,416	146,272
All birds	262,677	4,503	433,894	982,203	16,839	1,622,421
Long-billed curlew	35	0	70	131	0	263
Bald eagle	32	0	0	118	0	0
Golden eagle	457	119	773	1,708	447	2,890
Ferruginous hawk	70	0	162	263	0	604
Swainson's hawk	179	0	316	670	0	1,182
Burrowing owl	2,779	155	4,549	10,390	578	17,010
Common nighthawk	717	0	1,092	2,680	0	4,085
Lewis's woodpecker	28	0	70	105	0	263
Grasshopper sparrow	77	0	190	289	0	709
Brewer's sparrow	270	0	520	1,011	0	1,944
Hoary bat	95,260	16,317	115,838	356,198	61,013	433,143
Silver-haired bat	61,762	7,423	59,675	230,941	27,754	223,139

The small bird predictions in Tables 2 and 3 are probably biased low due to the preponderance of fatality search intervals being longer than what was appropriate for small birds, resulting in too many false-zero estimates (see Smallwood 2018). The bat predictions are also likely biased low for having used human searchers instead of dogs. In a recent study my colleagues and I found 73 bats at wind turbines using dogs where concurrent searches by humans found 1 bat over the same search areas, during the same time period, and at nearly the same search intervals (Attachment 1). This stunning result calls into question most of the bat fatality estimates in the USA, and indicates the very large predictions in Table 2 are too low. Even assuming the predictions are accurate, an annual toll of more than 5 million bats would qualify wind energy as by far the greatest mortality source for bats, begging the question of whether ongoing impacts are sustainable. These are the changed circumstances facing Summit Ridge, given the proposed several years of delay in project startup. The analysis performed in 2010 (based on 2009 data) is obsolete and cannot apply to the situation in 2023.

Much has changed since 2010, including our understanding of the magnitudes of impacts and whether certain mitigation measures are effective. For example, the US Fish and Wildlife Service (2013) projected a 35% reduction in national eagle numbers due to wind energy impacts. Eagles are protected by the federal Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act, as well as the Wasco County Ordinance at LUDO § 19.030.C.5. The US Fish and Wildlife Service's acknowledgement of a highly significant cumulative impact qualifies as an important changed

circumstance in which any wind project starting several years hence needs to be considered.

In another example of changed circumstances, when I was a member of the Alameda County Scientific Review Committee (SRC) overseeing fatality monitoring and mitigation strategies in the Altamont Pass Wind Resource Area from 2006 through 2011, the 5 of us on the SRC concurred that bat fatalities were not an issue in the Altamont Pass, because our human searchers monitoring at >40-day intervals were turning up about 1 bat fatality per year. After leaving the SRC in 2011, I initiated fatality monitoring in 2012 with much shorter search intervals at two wind projects in the Altamont Pass, and searchers started finding many more bats per year. When we initiated monitoring using skilled scent-detection dogs as fatality searchers in 2017, discoveries of bat fatalities escalated to the example I cited above – 73 bat fatality discoveries using dogs, versus 1 bat fatality using humans. A startup of Summit Ridge four years hence should not rely on what was known about bat and bird fatalities in 2010.

Related to the above example of how outdated understanding of the issues translate into poorly-founded policy, the Alameda County Programmatic Environmental Impact Report established a threshold bat fatality rate of 1.3 bats/MW/year, exceedance of which would result in mitigation to reduce or offset impacts. This fatality rate had been estimated by dividing the number of bats found during the first year of monitoring at the repowered Vasco Winds Energy Project by national averages for searcher detection and carcass persistence rates of bats placed in detection trials at wind projects across the USA and Canada. I used these national averages (reported in Smallwood 2013) in the first-year monitoring report for Vasco Winds because I lacked results based on sufficient sample sizes from my new integrated detection trials (Smallwood et al. 2018). The new integrated trials avoided the large sources of error and bias that were suspected and increasingly demonstrated in conventional detection trials (Smallwood 2007, Smallwood et al. 2010, 2013, 2018). County of Alameda relied on that first-year result from Vasco Winds as its mitigation threshold going forward, even though I warned the County that my new integrated detection trials were beginning to show that the fatality estimate based on national averages for searcher detection and carcass persistence was biased low. County of Alameda established a threshold that is now grossly exceeded by every wind project repowered in the Altamont Pass. The repowered Golden Hills project is killing bats at 5 times the County's threshold level. Perhaps the outdated information helped justify the County's decision to permit repowering projects in the Altamont Pass, but it did not prevent the impacts we are seeing borne out by the projects today, and it set in place an untenable mitigation threshold. Our understanding of the magnitude of the collision problems and what to do about them has been changing quickly; analysis from 2010 (based on 2009 data) is grossly outdated.

IMPACT AVOIDANCE, REDUCTION, AND MITIGATION

The applicant is required by OAR 345-021-0010(1)(p)(G) to provide "*a description of any measures proposed by the applicant to avoid, reduce, or mitigate the potential*

adverse impacts described [pursuant to OAR 345-021-0010(1)(p)(F)] in accordance with the general fish and wildlife habitat mitigation goals and standards described in OAR 635-415-0025 . . . , and a discussion of how the proposed measures would achieve those goals and requirements." In addition, the Council is required to evaluate the "*design, construction and operation of the facility, taking into account mitigation*" in determining compliance with OAR 345-022-0060(1) and OAR 345-022-0070(2).

For its part, the Wasco County ordinance at LUDO § 19.030.C.5 requires the Council to "*tak[e] into account mitigation, siting, design, construction, and operation [of] the energy facility*" in order to ultimately ensure that the facility "*will not cause significant adverse impact to important or significant natural resources*," and authorizes the Council to require "*monitoring and mitigation actions that [the Council] determines appropriate*." The applicant is also required by LUDO § 19.030.C.5.a to provide "*information pertaining to the energy facility's potential impacts and measures to avoid impacts*" and is required by LUDO § 19.030.C.5.c to "*[s]elect locations to reduce the likelihood of significant adverse impacts on natural resources based on expert analysis of baseline data*."

The application materials do not update the impact avoidance, reduction, and mitigation proposals to incorporate current baseline data, current science, and current technologies, including the latest micro-siting strategies. Very few projects through 2010 carefully micro-sited wind turbines to minimize collision fatalities. At that time, 'use' survey data, which were actually visual-scan point counts, were never suited for micro-siting without first mapping the positions of birds over the landscape, and then developing and later projecting predictive models of bird flights relative to the terrain (Smallwood 2018). Most use survey efforts were too coarse-grained in spatial resolution to inform how a wind turbine layout might affect birds. An early attempt to micro-site turbines was a project built by Babcock and Brown, from which Pattern Energy emerged as a company. I contracted with Babcock and Brown and later Pattern Energy to first advise on the turbine layout of the Buena Vista repowering project in the Altamont Pass and then to assess performance.

For micro-siting Buena Vista, I relied on behavior data I had been collecting in the Altamont Pass, rather than 'use' data, and I also relied on what I had already learned about fatality patterns relative to wind turbine locations on the landscape. I recommended that wind turbines not be installed on ridge saddles or breaks in slope, and I recommended that two wind turbines on either side of a deep ravine be mounted on towers that were 10 m taller than the rest. These recommendations were documented in the project's Environmental Impact Report (Lamphier-Gregory et al. 2005). The California Attorney General intervened when it concluded that the constructed project differed from the layout that was promised in the EIR by placing some turbines on towers that were too short and by installing some turbines on ridge saddles and breaks in slope. A settlement was negotiated for compensatory mitigation and new threshold fatality rates that would determine whether the company would be permitted to develop another repowered wind project in the Altamont Pass.

Subsequently, following post-construction monitoring, I learned that of the golden eagles and red-tailed hawks that I am aware were killed by the project, all but one red-tailed hawk were killed by wind turbines I had predicted would be more hazardous. Most of these fatalities were at wind turbines on ridge saddles and breaks in slope, and 2 of the golden eagle fatalities were at one of the turbines straddling the deep ravine that concerned me during the planning stage. Micro-siting based on behavior patterns and fatality patterns proved effective at Buena Vista – the proof coming from our ability to measure outcomes at a project that had not fully adhered to the micro-siting strategy.

Following that effort, I developed collision hazard models based on more intensive behavior survey data and more fatality data, and I used these models to recommend the layout of the repowered Vasco Winds Energy Project in 2011. I felt that the company listened well to my recommendations at Vasco Winds. After three years of post-construction monitoring, I had the opportunity to compare fatality rates in a before-after, control-impact (BACI) experimental design. The results included fatality reductions from the earlier wind project on the site by 75% to 82% for golden eagle, 34% to 47% for red-tailed hawk, 48% to 57% for American kestrels and 45% to 59% for burrowing owls (Brown et al. 2016). Annual fatality rates were reduced between 56% and 65% for all raptors combined, and 64% to 66% for all birds combined.

Since the Vasco Winds effort, I collected bird behavior data from 2011 through the present, as well as fatality data and golden eagle telemetry data (with Doug Bell as the lead investigator of the telemetry study). I also learned from earlier micro-siting surprises and mistakes, each one improving our understanding of collision factors and how to address them.

Our basis for micro-siting to minimize collision impacts is not the same in 2019 as it was in 2005 (Buena Vista) or 2010 (Vasco Winds). Instead, it is vastly improved. Any project planned to begin operations in 2023 should not rely on 'use' data collected in 2009, especially without appropriately analyzing those data to predict collision hazards posed by the turbine layout.

Although landscape-based collision hazard models have yet to be developed for bats, we have sufficient information to begin the process. We have sufficient fatality data, and we have 940 hours of behavior data around wind turbines using a thermal-imaging camera fit with a telephoto lens. Research on bat behaviors around wind turbines have added greatly to our understanding of the problem (Kunz et al. 2007, Horn et al. 2008, Cryan et al. 2014), as has the use of skilled detection dogs to find bats around wind turbines (Smallwood et al. unpublished data in preparation).

A micro-siting strategy to minimize bird and bat collision risk is needed at Summit Ridge (and this strategy must be part of the application materials, to be reviewed by the Council as part of its decision on the pending construction extensions). Micro-siting in this case would be additional to the micro-siting for engineering requirements discussed in the proposed order. It would be additional to the certificate holder's obligation "*to satisfy pre-construction survey requirements for fish and wildlife habitat (Condition*

10.7) and potential historic, cultural and archeological resources (Condition 11.3) in areas within the micrositing corridor…" The micro-siting strategy to which I refer is the shifting of wind turbine locations to avoid terrain or environmental conditions (e.g., copses of trees or ponds) that are heavily trafficked by flying birds and bats and that will contribute to disproportionately greater numbers of collision fatalities. This micro-siting strategy has been used at other wind projects. No other mitigation method has proven effective for minimizing or reducing bird collision impacts at wind projects.

For bats, the most effective strategy – the only effective strategy so far – has been operational curtailment. Operational curtailment typically involves a small increase in wind turbine cut-in speed, although it can also be guided by an algorithm that considers season of the year, time of night, and wind speed, among other variables. Generally, studies have documented about a 50% reduction in bat fatalities for a fractional percentage loss of wind generation.

A substantial fund needs to be committed for donation to wildlife rehabilitation facilities. Fatality searchers and wind project neighbors too often encounter injured birds and bats, which are often delivered to wildlife hospitals for treatment. Release rates from rehabilitation facilities tend to be low, partly due to the nature of wind turbine collision injuries and partly due to insufficient funds for maintaining facilities and keeping staff. Any new wind project should donate funds to cover the impacts of injured animals.

<u>Preconstruction surveys</u>

The proposed order's Condition 10.7 requires preconstruction surveys for wildlife within the micro-siting corridor. Elsewhere these types of surveys are referred to as "take-avoidance surveys" and are intended to find and relocate special-status species of animals or plants in jeopardy of being crushed by the heavy machinery of project construction. In her 19 February 2019 email to Luke May, Linnea Fossum of Tetra Tech confirms her understanding of the required survey is that they are indeed preconstruction, take-avoidance surveys. These surveys compose a sensible last-minute effort to salvage the readily salvageable biological resources on a project site, but they are no substitute for detection surveys. Preconstruction surveys are more effective when informed by detection surveys, which are surveys of sufficient rigor that absence determinations can be justified if no members of the target species are found. Species experts have prepared detection survey protocols or guidelines for most special-status species. Using these protocols typically requires more time and effort than is available for preconstruction surveys, but they are helpful to preconstruction surveys by prioritizing where preconstruction surveys can be most productive and by informing appropriate compensatory mitigation.

I recommend revising Condition 10.7 so that it clearly states the purpose and objectives of preconstruction surveys. I also recommend requiring the completion of detection surveys prior to preconstruction surveys, and that these detection surveys extend to the 400-foot boundaries as specified in Condition 10.7. The baseline study included few if

any true detection surveys, and by construction startup too much time will have passed since the baseline study. Preconstruction surveys should be informed by detection surveys.

POST-CONSTRUCTION MONITORING

The applicant is required by OAR 345-021-0010(p)(H) to provide "*[a] description of the applicant's proposed monitoring plans to evaluate the success of the measures [for avoiding, reducing, or mitigating wildlife impacts] described*" under OAR 345-021-0010(p)(G)," and is required by OAR 345-021-0010(q)(G) to provide a "*proposed monitoring program . . . for impacts to threatened and endangered species*." Similarly, the Wasco County ordinance at LUDO § 19.030.C.5.k requires the applicant to provide "*a plan for post-construction monitoring of the facility site using appropriate survey protocols to measure the impact of the project on identified natural resources in the area*" (the citation in the Wasco ordinance is LUDO § 19.030.C.5.j(3), but given the grammatical context of this ordinance, this provision was probably intended to be placed at LUDO § 19.030.C.5.k).

Perhaps the strongest contribution that use surveys can bring to wind project impact assessments is in their repetition before and after construction. Use surveys are suited for measuring relative abundance of readily visible diurnal birds, so performing them before and after a wind project is built and operational can inform of changes in relative abundance. Whether any such changes can be attributed to the wind project however, requires the control of variation in an experimental design (Sinclair and DeGeorge 2016). The Habitat Mitigation Plan ought to be revised by informing it with additional use surveys prior to construction, and by informing of impacts by formulating a post-construction use-survey effort. Both the before and after survey efforts should be designed with experimental design tenets in mind.

Northwest Wildlife Consultants (2010) proposed methods for fatality monitoring – methods which surely should not be implemented in 2019, nor in 2023. Since 2010, we have learned a great deal about sources of uncertainty, biases and methodological efficacy related to fatality monitoring used to estimate fatality rates. The Habitat Mitigation Plan needs to be revised accordingly. Below are specific recommendations for improving post-construction fatality monitoring at Summit Ridge:

- Fatality searches need to be performed using skilled detection dogs (see Attachment 1).

- The proposed fatality search interval is too long, at 23 days. It has been well established that search intervals longer than 10 days are too long.

- The proposed monitoring duration is too brief at one year per turbine. A single year of fatality monitoring cannot possibly inform of inter-annual variation in fatality rates. Three years should be the minimum.

- The maximum search radius is too short, at a distance equal to the height above ground of the blade tip in the 12:00 position. Smallwood et al. (2018) established that this distance would be insufficient. The maximum search radius needs to be 160 m.

- The carcass persistence trials will bias the adjustment factor due to use of two body-size categories and placement of carcasses outside the fatality search plots where scavengers will not be searching for them. Integrated carcass detection trials are what is needed going forward. See Smallwood et al. (2018) for specific details.

- The searcher efficiency trials will be biased by placing carcasses in search areas just prior to fatality searches. Fatality searchers need to be tested on bird and bat carcasses that have weathered the environment at the same times and duration as carcasses of wind turbine fatalities. Integrated detection trials are what is needed.

- A searcher's pacing in meters per minute should not be specified in a fatality monitoring protocol. The searchers need to use whatever pace suits the situation, and however much time suits the conditions within the maximum search radius of the turbine.

- The protocol for handling incidental finds also needs to be updated to include all incidental fatality detections in the fatality estimate.

- Injured animals should be counted as fatalities, and if a particular animal cannot be associated with a specific turbine due to mobility of the injured animal, then it should be assigned to the project.

- The proposed use of mean days to carcass removal needs to be replaced with the proportion of carcasses found in integrated detection trials. Mean days to carcass removal is known to bias fatality estimates lower the longer the trial lasts (Smallwood et al. 2013, 2018).

- It should be specified that clearing searches will not be performed, and all found carcasses should be left in the field as found in order to avoid altering scavenger dynamics. The results of fatality monitoring should represent conditions typical of when there will be no fatality monitoring.

- There should be a specified threshold searcher detection rate, below which searchers (dogs or humans) need to be replaced.

- During the year preceding construction, fatality monitoring should commence to quantify background mortality.

- Northwest Wildlife Consultants (2010) proposes fatality rates serving as thresholds of concern, above which mitigation would be implemented. These thresholds need to be species-specific and agreed-upon with state and federal regulators; consultants should not be in the business of deciding which level of mortality is of concern. As is, the thresholds assigned to broad vegetation cover types are vague and unenforceable, as species can be reassigned to some other cover type to prevent threshold exceedance of any particular cover type.

- Data reporting needs to be to public, and not just to ODOE. A critical attribute of the scientific method is transparency, so all results need to be made available to the public.

In addition to the fatality monitoring measures, post-construction monitoring of relative abundance and behaviors is needed. The way to quantify habitat impacts via displacement is to compare use rates and behavior rates before and after wind turbine construction. The same needs to be done for bats using either acoustic detectors or thermal-imaging cameras, or both. These post-construction monitoring methods need to be tied to preconstruction monitoring methods using experimental design tenets, ensuring that objectives can be met (Sinclair and DeGeorge 2016). Also, additional mitigation options need to be identified prior to construction, and these measures need to be tied to threshold outcomes of post-construction monitoring. Such measures might include wind turbine removals or increased operational curtailment, or provision of additional compensatory funds or habitat protections.

SUMMARY OF COMMENTS

Pattern Energy's request for extensions of the construction deadlines for the Summit Ridge Wind Farm was submitted with an amended Habitat Mitigation Plan (January 2019) and Pattern's responses to EFSC standards. I commented on (1) the suitability of the habitat assessment underlying the amended Habitat Mitigation Plan, and (2) the need to update baseline surveys, project impact predictions, mitigation measures, and post-construction monitoring protocols. I found that the habitat assessment was based on a conveniently invented characterization of wildlife habitat that does not find its origin in wildlife ecology and that is inconsistent with the definition of habitat in OAR 635-415-0005. Habitat analysis is needed for each species, separately, and in the context of a wind project it needs to include displacement effects of wind turbines.

The most recent avian use surveys and bat detection surveys at the proposed Summit Ridge site were performed in 2009. In the decade since those surveys, much has been learned about the strengths and weaknesses of methods used in the baseline study (Northwest Wildlife Consultants 2010) and in the proposed post-construction fatality monitoring plan. To be consistent with the applicable law and management guidance, the baseline study needs to be updated. Use surveys are needed at the level of effort recommended by the US Fish and Wildlife Service. Behavior surveys are needed for

micro-siting to minimize collision impacts. Bat surveys are needed at many more stations across the project area and at heights above ground that are relevant to wind turbine impacts. All measured variables and metrics need to be reported to scientific standards, including error terms and assessments of potential biases. Impact predictions are needed that are based on careful interpretation of impacts measured at other wind projects, and this interpretation needs to account for the biases and sources of uncertainty that have been quantified since 2010. Of critical importance is the need for a cumulative effects analysis, given the >3-fold increase in USA installed wind energy capacity since this project was initially proposed and the fatality impacts that have accompanied this increase.

I recommended wind turbine micro-siting to minimize collision impacts of birds and bats because, incredibly, no such effort has yet occurred at the Summit Ridge site. Careful micro-siting has been found to substantially reduce raptor fatality rates at repowered wind projects in the APWRA, so we know it works. Besides careful micro-siting to minimize collision impacts of both birds and bats, operational curtailment needs to be formulated as a mitigation measure, and funds need to be committed for wildlife rehabilitation facilities to care for injured wildlife. I also recommended a suite of improvements to the proposed post-construction fatality monitoring, most importantly the use of skilled detection dogs as fatality searchers, a much shorter search interval than proposed, and longer duration.

Thank you for your attention,

Shawn Smallwood, Ph.D.

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Kenneth Shawn Smallwood
Curriculum Vitae

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Born May 3, 1963 in Sacramento, California. Married, father of two.

Ecologist

Expertise

- Finding solutions to controversial problems related to wildlife interactions with human industry, infrastructure, and activities;
- Wildlife monitoring and field study using GPS, thermal imaging, behavior surveys;
- Using systems analysis and experimental design principles to identify meaningful ecological patterns that inform management decisions.

Education

Ph.D. Ecology, University of California, Davis. September 1990.
M.S. Ecology, University of California, Davis. June 1987.
B.S. Anthropology, University of California, Davis. June 1985.
Corcoran High School, Corcoran, California. June 1981.

Experience

- 480 professional publications, including:
- 83 peer reviewed publications
- 24 in non-reviewed proceedings
- 371 reports, declarations, posters and book reviews
- 8 in mass media outlets
- 87 public presentations of research results

Editing for scientific journals: Guest Editor, *Wildlife Society Bulletin*, 2012-2013, of invited papers representing international views on the impacts of wind energy on wildlife and how to mitigate the impacts. Associate Editor, *Journal of Wildlife Management*, March 2004 to 30 June 2007. Editorial Board Member, *Environmental Management*, 10/1999 to 8/2004. Associate Editor, *Biological Conservation*, 9/1994 to 9/1995.

Member, Alameda County Scientific Review Committee (SRC), August 2006 to April 2011. The five-member committee investigated causes of bird and bat collisions in the Altamont Pass Wind Resource Area, and recommended mitigation and monitoring measures. The SRC

reviewed the science underlying the Alameda County Avian Protection Program, and advised the County on how to reduce wildlife fatalities.

Consulting Ecologist, 2004-2007, California Energy Commission (CEC). Provided consulting services as needed to the CEC on renewable energy impacts, monitoring and research, and produced several reports. Also collaborated with Lawrence-Livermore National Lab on research to understand and reduce wind turbine impacts on wildlife.

Consulting Ecologist, 1999-2013, U.S. Navy. Performed endangered species surveys, hazardous waste site monitoring, and habitat restoration for the endangered San Joaquin kangaroo rat, California tiger salamander, California red-legged frog, California clapper rail, western burrowing owl, salt marsh harvest mouse, and other species at Naval Air Station Lemoore; Naval Weapons Station, Seal Beach, Detachment Concord; Naval Security Group Activity, Skaggs Island; National Radio Transmitter Facility, Dixon; and, Naval Outlying Landing Field Imperial Beach.

Part-time Lecturer, 1998-2005, California State University, Sacramento. Instructed Mammalogy, Behavioral Ecology, and Ornithology Lab, Contemporary Environmental Issues, Natural Resources Conservation.

Senior Ecologist, 1999-2005, BioResource Consultants. Designed and implemented research and monitoring studies related to avian fatalities at wind turbines, avian electrocutions on electric distribution poles across California, and avian fatalities at transmission lines.

Chairman, Conservation Affairs Committee, The Wildlife Society--Western Section, 1999-2001. Prepared position statements and led efforts directed toward conservation issues, including travel to Washington, D.C. to lobby Congress for more wildlife conservation funding.

Systems Ecologist, 1995-2000, Institute for Sustainable Development. Headed ISD's program on integrated resources management. Developed indicators of ecological integrity for large areas, using remotely sensed data, local community involvement and GIS.

Associate, 1997-1998, Department of Agronomy and Range Science, University of California, Davis. Worked with Shu Geng and Mingua Zhang on several studies related to wildlife interactions with agriculture and patterns of fertilizer and pesticide residues in groundwater across a large landscape.

Lead Scientist, 1996-1999, National Endangered Species Network. Informed academic scientists and environmental activists about emerging issues regarding the Endangered Species Act and other environmental laws. Testified at public hearings on endangered species issues.

Ecologist, 1997-1998, Western Foundation of Vertebrate Zoology. Conducted field research to determine the impact of past mercury mining on the status of California red-legged frogs in Santa Clara County, California.

Senior Systems Ecologist, 1994-1995, EIP Associates, Sacramento, California. Provided consulting services in environmental planning, and quantitative assessment of land units for their

conservation and restoration opportunities basedon ecological resource requirements of 29 special-status species. Developed ecological indicators for prioritizing areas within Yolo County to receive mitigation funds for habitat easements and restoration.

Post-Graduate Researcher, 1990-1994, Department of Agronomy and Range Science, *U.C. Davis*. Under Dr. Shu Geng's mentorship, studied landscape and management effects on temporal and spatial patterns of abundance among pocket gophers and species of Falconiformes and Carnivora in the Sacramento Valley. Managed and analyzed a data base of energy use in California agriculture. Assisted with landscape (GIS) study of groundwater contamination across Tulare County, California.

Work experience in graduate school: Co-taught Conservation Biology with Dr. Christine Schonewald, 1991 & 1993, UC Davis Graduate Group in Ecology; Reader for Dr. Richard Coss's course on Psychobiology in 1990, UC Davis Department of Psychology; Research Assistant to Dr. Walter E. Howard, 1988-1990, UC Davis Department of Wildlife and Fisheries Biology, testing durable baits for pocket gopher management in forest clearcuts; Research Assistant to Dr. Terrell P. Salmon, 1987-1988, UC Wildlife Extension, Department of Wildlife and Fisheries Biology, developing empirical models of mammal and bird invasions in North America, and a rating system for priority research and control of exotic species based on economic, environmental and human health hazards in California. Student Assistant to Dr. E. Lee Fitzhugh, 1985-1987, UC Cooperative Extension, Department of Wildlife and Fisheries Biology, developing and implementing statewide mountain lion track count for long-term monitoring.

Fulbright Research Fellow, Indonesia, 1988. Tested use of new sampling methods for numerical monitoring of Sumatran tiger and six other species of endemic felids, and evaluated methods used by other researchers.

Projects

Repowering wind energy projects through careful siting of new wind turbines using map-based collision hazard models to minimize impacts to volant wildlife. Funded by wind companies (principally NextEra Renewable Energy, Inc.), California Energy Commission and East Bay Regional Park District, I have collaborated with a GIS analyst and managed a crew of five field biologists performing golden eagle behavior surveys and nocturnal surveys on bats and owls. The goal is to quantify flight patterns for development of predictive models to more carefully site new wind turbines in repowering projects. Focused behavior surveys began May 2012 and continue. Collision hazard models have been prepared for seven wind projects, three of which were built. Planning for additional repowering projects is underway.

Test avian safety of new mixer-ejector wind turbine (MEWT). Designed and implemented a before-after, control-impact experimental design to test the avian safety of a new, shrouded wind turbine developed by Ogin Inc. (formerly known as FloDesign Wind Turbine Corporation). Supported by a $718,000 grant from the California Energy Commission's Public Interest Energy Research program and a 20% match share contribution from Ogin, I managed a crew of seven field biologists who performed periodic fatality searches and behavior surveys, carcass detection trials, nocturnal behavior surveys using a thermal camera, and spatial analyses with the collaboration of a GIS

analyst. Field work began 1 April 2012 and ended 30 March 2015 without Ogin installing its MEWTs, but we still achieved multiple important scientific advances.

Reduce avian mortality due to wind turbines at Altamont Pass. Studied wildlife impacts caused by 5,400 wind turbines at the world's most notorious wind resource area. Studied how impacts are perceived by monitoring and how they are affected by terrain, wind patterns, food resources, range management practices, wind turbine operations, seasonal patterns, population cycles, infrastructure management such as electric distribution, animal behavior and social interactions.

Reduce avian mortality on electric distribution poles. Directed research toward reducing bird electrocutions on electric distribution poles, 2000-2007. Oversaw 5 founds of fatality searches at 10,000 poles from Orange County to Glenn County, California, and produced two large reports.

Cook *et al*. v. Rockwell International *et al*., No. 90-K-181 (D. Colorado). Provided expert testimony on the role of burrowing animals in affecting the fate of buried and surface-deposited radioactive and hazardous chemical wastes at the Rocky Flats Plant, Colorado. Provided expert reports based on four site visits and an extensive document review of burrowing animals. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals. I testified in federal court in November 2005, and my clients were subsequently awarded a $553,000,000 judgment by a jury. After appeals the award was increased to two billion dollars.

Hanford Nuclear Reservation Litigation. Provided expert testimony on the role of burrowing animals in affecting the fate of buried radioactive wastes at the Hanford Nuclear Reservation, Washington. Provided three expert reports based on three site visits and extensive document review. Predicted and verified a certain population density of pocket gophers on buried waste structures, as well as incidence of radionuclide contamination in body tissue. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals.

Expert testimony and declarations on proposed residential and commercial developments, gas-fired power plants, wind, solar and geothermal projects, water transfers and water transfer delivery systems, endangered species recovery plans, Habitat Conservation Plans and Natural Communities Conservation Programs. Testified before multiple government agencies, Tribunals, Boards of Supervisors and City Councils, and participated with press conferences and depositions. Prepared expert witness reports and court declarations, which are summarized under Reports (below).

Protocol-level surveys for special-status species. Used California Department of Fish and Wildlife and US Fish and Wildlife Service protocols to search for California red-legged frog, California tiger salamander, arroyo southwestern toad, blunt-nosed leopard lizard, western pond turtle, giant kangaroo rat, San Joaquin kangaroo rat, San Joaquin kit fox, western burrowing owl, Swainson's hawk, Valley elderberry longhorn beetle and other special-status species.

Conservation of San Joaquin kangaroo rat. Performed research to identify factors responsible for the decline of this endangered species at Lemoore Naval Air Station, 2000-2013, and implemented habitat enhancements designed to reverse the trend and expand the population.

Impact of West Nile Virus on yellow-billed magpies. Funded by Sacramento-Yolo Mosquito and Vector Control District, 2005-2008, compared survey results pre- and post-West Nile Virus epidemic for multiple bird species in the Sacramento Valley, particularly on yellow-billed magpie and American crow due to susceptibility to WNV.

Workshops on HCPs. Assisted Dr. Michael Morrison with organizing and conducting a 2-day workshop on Habitat Conservation Plans, sponsored by Southern California Edison, and another 1-day workshop sponsored by PG&E. These Workshops were attended by academics, attorneys, and consultants with HCP experience. We guest-edited a Proceedings published in Environmental Management.

Mapping of biological resources along Highways 101, 46 and 41. Used GPS and GIS to delineate vegetation complexes and locations of special-status species along 26 miles of highway in San Luis Obispo County, 14 miles of highway and roadway in Monterey County, and in a large area north of Fresno, including within reclaimed gravel mining pits.

GPS mapping and monitoring at restoration sites and at Caltrans mitigation sites. Monitored the success of elderberry shrubs at one location, the success of willows at another location, and the response of wildlife to the succession of vegetation at both sites. Also used GPS to monitor the response of fossorial animals to yellow star-thistle eradication and natural grassland restoration efforts at Bear Valley in Colusa County and at the decommissioned Mather Air Force Base in Sacramento County.

Mercury effects on Red-legged Frog. Assisted Dr. Michael Morrison and US Fish and Wildlife Service in assessing the possible impacts of historical mercury mining on the federally listed California red-legged frog in Santa Clara County. Also measured habitat variables in streams.

Opposition to proposed No Surprises rule. Wrote a white paper and summary letter explaining scientific grounds for opposing the incidental take permit (ITP) rules providing ITP applicants and holders with general assurances they will be free of compliance with the Endangered Species Act once they adhere to the terms of a "properly functioning HCP." Submitted 188 signatures of scientists and environmental professionals concerned about No Surprises rule US Fish and Wildlife Service, National Marine Fisheries Service, all US Senators.

Natomas Basin Habitat Conservation Plan alternative. Designed narrow channel marsh to increase the likelihood of survival and recovery in the wild of giant garter snake, Swainson's hawk and Valley Elderberry Longhorn Beetle. The design included replication and interspersion of treatments for experimental testing of critical habitat elements. I provided a report to Northern Territories, Inc.

Assessments of agricultural production system and environmental technology transfer to China. Twice visited China and interviewed scientists, industrialists, agriculturalists, and the Directors of the Chinese Environmental Protection Agency and the Department of Agriculture to assess the need and possible pathways for environmental clean-up technologies and trade opportunities between the US and China.

Yolo County Habitat Conservation Plan. Conducted landscape ecology study of Yolo County to spatially prioritize allocation of mitigation efforts to improve ecosystem functionality within the

County from the perspective of 29 special-status species of wildlife and plants. Used a hierarchically structured indicators approach to apply principles of landscape and ecosystem ecology, conservation biology, and local values in rating land units. Derived GIS maps to help guide the conservation area design, and then developed implementation strategies.

Mountain lion track count. Developed and conducted a carnivore monitoring program throughout California since 1985. Species counted include mountain lion, bobcat, black bear, coyote, red and gray fox, raccoon, striped skunk, badger, and black-tailed deer. Vegetation and land use are also monitored. Track survey transect was established on dusty, dirt roads within randomly selected quadrats.

Sumatran tiger and other felids. Upon award of Fulbright Research Fellowship, I designed and initiated track counts for seven species of wild cats in Sumatra, including Sumatran tiger, fishing cat, and golden cat. Spent four months on Sumatra and Java in 1988, and learned Bahasa Indonesia, the official Indonesian language.

Wildlife in agriculture. Beginning as post-graduate research, I studied pocket gophers and other wildlife in 40 alfalfa fields throughout the Sacramento Valley, and I surveyed for wildlife along a 200 mile road transect since 1989 with a hiatus of 1996-2004. The data are analyzed using GIS and methods from landscape ecology, and the results published and presented orally to farming groups in California and elsewhere. I also conducted the first study of wildlife in cover crops used on vineyards and orchards.

Agricultural energy use and Tulare County groundwater study. Developed and analyzed a data base of energy use in California agriculture, and collaborated on a landscape (GIS) study of groundwater contamination across Tulare County, California.

Pocket gopher damage in forest clear-cuts. Developed gopher sampling methods and tested various poison baits and baiting regimes in the largest-ever field study of pocket gopher management in forest plantations, involving 68 research plots in 55 clear-cuts among 6 National Forests in northern California.

Risk assessment of exotic species in North America. Developed empirical models of mammal and bird species invasions in North America, as well as a rating system for assigning priority research and control to exotic species in California, based on economic, environmental, and human health hazards.

Peer Reviewed Publications

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Smallwood, K. S. 2013. Comparing bird and bat fatality-rate estimates among North American wind-energy projects. Wildlife Society Bulletin 37:19-33. + Online Supplemental Material.

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Comments on Environmental Documents

I was retained or commissioned to comment on environmental planning and review documents, including:

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- Notes on Proposed Study Options for Trail Impacts on Northern Spotted Owl (2017; 4 pp);
- San Gorgonio Crossings EIR (2017; 22 pp);
- Replies to responses on Jupiter Project IS and MND (2017; 12 pp);
- MacArthur Transit Village Project Modified 2016 CEQA Analysis (2017; 12 pp);
- Central SoMa Plan DEIR (2017; 14 pp);
- Colony Commerce Center Specific Plan DEIR (2016; 16 pp);
- Fairway Trails Improvements MND (2016; 13 pp);
- Review of Avian-Solar Science Plan (2016; 28 pp);
- Replies to responses on Initial Study for Pyramid Asphalt (2016; 5 pp);
- Initial Study for Pyramid Asphalt (2016; 4 pp);
- Agua Mansa Distribution Warehouse Project Initial Study (2016; 14 pp);
- Santa Anita Warehouse IS and MND (2016; 12 pp);
- CapRock Distribution Center III DEIR (2016: 12 pp);
- Orange Show Logistics Center Initial Study and MND (2016; 9 pp);
- City of Palmdale Oasis Medical Village Project IS and MND (2016; 7 pp);
- Comments on proposed rule for incidental eagle take (2016, 49 pp);
- Grapevine Specific and Community Plan FEIR (2016; 25 pp);
- Grapevine Specific and Community Plan DEIR (2016; 15 pp);
- Clinton County Zoning Ordinance for Wind Turbine siting (2016);
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- Tri-City Industrial Complex Initial Study (2016; 5 pp);
- Hidden Canyon Industrial Park Plot Plan 16-PP-02 (2016; 12 pp);
- Kimball Business Park DEIR (2016; 10 pp);
- Jupiter Project IS and MND (2016; 9 pp);
- Revised Draft Giant Garter Snake Recovery Plan of 2015 (2016, 18 pp);
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- Proposed Section 24 Specific Plan Agua Caliente Band of Cahuilla Indians DEIS (2015, 9 pp);
- Replies to comments 24 Specific Plan Agua Caliente Band of Cahuilla Indians FEIS (2015, 6 pp);
- Willow Springs Solar Photovoltaic Project DEIR (2015; 28 pp);
- Sierra Lakes Commerce Center Project DEIR (2015, 9 pp);
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- West Valley Logistics Center Specific Plan DEIR (2015, 10 pp);
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- Bay Delta Conservation Plan EIR/EIS (2014, 21 pp);
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- Response to Comments on the Addison Wind Energy Project DEIR (2014, 15 pp);
- Addison and Rising Tree Wind Energy Project FEIR (2014, 12 pp);
- Alta East Wind Energy Project FEIS (2013, 23 pp);
- Blythe Solar Power Project Staff Assessment, California Energy Commission (2013, 16 pp);
- Clearwater and Yakima Solar Projects DEIR (2013, 9 pp);
- Cuyama Solar Project DEIR (2014, 19 pp);
- Draft Desert Renewable Energy Conservation Plan (DRECP) EIR/EIS (2015, 49 pp);
- Kingbird Solar Photovoltaic Project EIR (2013, 19 pp);
- Lucerne Valley Solar Project Initial Study & Mitigated Negative Declaration (2013, 12 pp);
- Palen Solar Electric Generating System Final Staff Assessment of California Energy Commission, (2014, 20 pp);
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- Rising Tree Wind Energy Project DEIR (2014, 32 pp);
- Response to Comments on the Rising Tree Wind Energy Project DEIR (2014, 15 pp);
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- Declaration in opposition to BLM fracking (2013; 5 pp);
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- Reply to Staff Responses to Comments on Soccer Center Solar Project Mitigated Negative

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- Declaration on Initial Study and Proposed Negative Declaration for the Butte Water District 2012 Water Transfer Program (2012; 11 pp);
- Mount Signal and Calexico Solar Farm Projects DEIR (2011; 16 pp);
- City of Elk Grove Sphere of Influence EIR (2011; 28 pp);
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- Statement of Shawn Smallwood, Ph.D. Regarding Proposed Rabik/Gudath Project, 22611 Coleman Valley Road, Bodega Bay (CPN 10-0002) (2011; 4 pp);
- Declaration of K. Shawn Smallwood on Biological Impacts of the Ivanpah Solar Electric Generating System (ISEGS) (2011; 9 pp);
- Comments on Draft Eagle Conservation Plan Guidance (2011; 13 pp);
- Comments on Draft EIR/EA for Niles Canyon Safety Improvement Project (2011; 16 pp);
- Declaration of K. Shawn Smallwood, Ph.D., on Biological Impacts of the Route 84 Safety Improvement Project (2011; 7 pp);
- Rebuttal Testimony of Witness #22, K. Shawn Smallwood, Ph.D, on Behalf of Intervenors Friends of The Columbia Gorge & Save Our Scenic Area (2010; 6 pp);
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- Buena Vista Wind Energy Project Notice of Preparation of EIR (2004; 15 pp);
- Negative Declaration of the proposed Callahan Estates Subdivision (2004; 11 pp);
- Negative Declaration of the proposed Winters Highlands Subdivision (2004; 9 pp);
- Negative Declaration of the proposed Winters Highlands Subdivision (2004; 13 pp);
- Negative Declaration of the proposed Creekside Highlands Project, Tract 7270 (2004; 21 pp);
- On the petition California Fish and Game Commission to list the Burrowing Owl as threatened or endangered (2003; 10 pp);
- Conditional Use Permit renewals from Alameda County for wind turbine operations in the Altamont Pass Wind Resource Area (2003; 41 pp);
- UC Davis Long Range Development Plan of 2003, particularly with regard to the Neighborhood Master Plan (2003; 23 pp);
- Anderson Marketplace Draft Environmental Impact Report (2003: 18 pp + 3 plates of photos);
- Negative Declaration of the proposed expansion of Temple B'nai Tikyah (2003: 6 pp);
- Antonio Mountain Ranch Specific Plan Public Draft EIR (2002: 23 pp);
- Response to testimony of experts at the East Altamont Energy Center evidentiary hearing on biological resources (2002: 9 pp);
- Revised Draft Environmental Impact Report, The Promenade (2002: 7 pp);
- Recirculated Initial Study for Calpine's proposed Pajaro Valley Energy Center (2002: 3 pp);
- UC Merced -- Declaration of Dr. Shawn Smallwood in support of petitioner's application for temporary restraining order and preliminary injunction (2002: 5 pp);
- Replies to response to comments in Final Environmental Impact Report, Atwood Ranch Unit III Subdivision (2003: 22 pp);
- Draft Environmental Impact Report, Atwood Ranch Unit III Subdivision (2002: 19 pp + 8 photos on 4 plates);
- California Energy Commission Staff Report on GWF Tracy Peaker Project (2002: 17 pp + 3 photos; follow-up report of 3 pp);
- Initial Study and Negative Declaration, Silver Bend Apartments, Placer County (2002: 13 pp);
- UC Merced Long-range Development Plan DEIR and UC Merced Community Plan DEIR (2001: 26 pp);
- Initial Study, Colusa County Power Plant (2001: 6 pp);
- Comments on Proposed Dog Park at Catlin Park, Folsom, California (2001: 5 pp + 4 photos);
- Pacific Lumber Co. (Headwaters) Habitat Conservation Plan and Environmental Impact Report (1998: 28 pp);
- Final Environmental Impact Report/Statement for Issuance of Take authorization for listed

species within the MSCP planning area in San Diego County, California (Fed. Reg. 62 (60): 14938, San Diego Multi-Species Conservation Program) (1997: 10 pp);

- Permit (PRT-823773) Amendment for the Natomas Basin Habitat Conservation Plan, Sacramento, CA (Fed. Reg. 63 (101): 29020-29021) (1998);
- Draft Recovery Plan for the Giant Garter Snake (*Thamnophis gigas*). (Fed. Reg. 64(176): 49497-49498) (1999: 8 pp);
- Review of the Draft Recovery Plan for the Arroyo Southwestern Toad (*Bufo microscaphus californicus*) (1998);
- Ballona West Bluffs Project Environmental Impact Report (1999: oral presentation);
- California Board of Forestry's proposed amended Forest Practices Rules (1999);
- Negative Declaration for the Sunset Skyranch Airport Use Permit (1999);
- Calpine and Bechtel Corporations' Biological Resources Implementation and Monitoring Program (BRMIMP) for the Metcalf Energy Center (2000: 10 pp);
- California Energy Commission's Final Staff Assessment of the proposed Metcalf Energy Center (2000);
- US Fish and Wildlife Service Section 7 consultation with the California Energy Commission regarding Calpine and Bechtel Corporations' Metcalf Energy Center (2000: 4 pp);
- California Energy Commission's Preliminary Staff Assessment of the proposed Metcalf Energy Center (2000: 11 pp);
- Site-specific management plans for the Natomas Basin Conservancy's mitigation lands, prepared by Wildlands, Inc. (2000: 7 pp);
- Affidavit of K. Shawn Smallwood in Spirit of the Sage Council, et al. (Plaintiffs) vs. Bruce Babbitt, Secretary, U.S. Department of the Interior, et al. (Defendants), Injuries caused by the No Surprises policy and final rule which codifies that policy (1999: 9 pp).

Comments on other Environmental Review Documents:

- Proposed Regulation for California Fish and Game Code Section 3503.5 (2015: 12 pp);
- Statement of Overriding Considerations related to extending Altamont Winds, Inc.'s Conditional Use Permit PLN2014-00028 (2015; 8 pp);
- Draft Program Level EIR for Covell Village (2005; 19 pp);
- Bureau of Land Management Wind Energy Programmatic EIS Scoping document (2003: 7 pp.);
- NEPA Environmental Analysis for Biosafety Level 4 National Biocontainment Laboratory (NBL) at UC Davis (2003: 7 pp);
- Notice of Preparation of UC Merced Community and Area Plan EIR, on behalf of The Wildlife Society—Western Section (2001: 8 pp.);
- Preliminary Draft Yolo County Habitat Conservation Plan (2001; 2 letters totaling 35 pp.);
- Merced County General Plan Revision, notice of Negative Declaration (2001: 2 pp.);
- Notice of Preparation of Campus Parkway EIR/EIS (2001: 7 pp.);
- Draft Recovery Plan for the bighorn sheep in the Peninsular Range (*Ovis candensis*) (2000);
- Draft Recovery Plan for the California Red-legged Frog (*Rana aurora draytonii*), on behalf of The Wildlife Society—Western Section (2000: 10 pp.);
- Sierra Nevada Forest Plan Amendment Draft Environmental Impact Statement, on behalf of The Wildlife Society—Western Section (2000: 7 pp.);

- State Water Project Supplemental Water Purchase Program, Draft Program EIR (1997);
- Davis General Plan Update EIR (2000);
- Turn of the Century EIR (1999: 10 pp);
- Proposed termination of Critical Habitat Designation under the Endangered Species Act (Fed. Reg. 64(113): 31871-31874) (1999);
- NOA Draft Addendum to the Final Handbook for Habitat Conservation Planning and Incidental Take Permitting Process, termed the HCP 5-Point Policy Plan (Fed. Reg. 64(45): 11485 - 11490) (1999; 2 pp + attachments);
- Covell Center Project EIR and EIR Supplement (1997).

Position Statements I prepared the following position statements for the Western Section of The Wildlife Society, and one for nearly 200 scientists:

- Recommended that the California Department of Fish and Game prioritize the extermination of the introduced southern water snake in northern California. The Wildlife Society--Western Section (2001);
- Recommended that The Wildlife Society—Western Section appoint or recommend members of the independent scientific review panel for the UC Merced environmental review process (2001);
- Opposed the siting of the University of California's 10th campus on a sensitive vernal pool/grassland complex east of Merced. The Wildlife Society--Western Section (2000);
- Opposed the legalization of ferret ownership in California. The Wildlife Society--Western Section (2000);
- Opposed the Proposed "No Surprises," "Safe Harbor," and "Candidate Conservation Agreement" rules, including permit-shield protection provisions (Fed. Reg. Vol. 62, No. 103, pp. 29091-29098 and No. 113, pp. 32189-32194). This statement was signed by 188 scientists and went to the responsible federal agencies, as well as to the U.S. Senate and House of Representatives.

Posters at Professional Meetings

Leyvas, E. and K. S. Smallwood. 2015. Rehabilitating injured animals to offset and rectify wind project impacts. Conference on Wind Energy and Wildlife Impacts, Berlin, Germany, 9-12 March 2015.

Smallwood, K. S., J. Mount, S. Standish, E. Leyvas, D. Bell, E. Walther, B. Karas. 2015. Integrated detection trials to improve the accuracy of fatality rate estimates at wind projects. Conference on Wind Energy and Wildlife Impacts, Berlin, Germany, 9-12 March 2015.

Smallwood, K. S. and C. G. Thelander. 2005. Lessons learned from five years of avian mortality research in the Altamont Pass WRA. AWEA conference, Denver, May 2005.

Neher, L., L. Wilder, J. Woo, L. Spiegel, D. Yen-Nakafugi, and K.S. Smallwood. 2005. Bird's eye view on California wind. AWEA conference, Denver, May 2005.

Smallwood, K. S., C. G. Thelander and L. Spiegel. 2003. Toward a predictive model of avian

fatalities in the Altamont Pass Wind Resource Area. Windpower 2003 Conference and Convention, Austin, Texas.

Smallwood, K.S. and Eva Butler. 2002. Pocket Gopher Response to Yellow Star-thistle Eradication as part of Grassland Restoration at Decommissioned Mather Air Force Base, Sacramento County, California. White Mountain Research Station Open House, Barcroft Station.

Smallwood, K.S. and Michael L. Morrison. 2002. Fresno kangaroo rat (*Dipodomys nitratoides*) Conservation Research at Resources Management Area 5, Lemoore Naval Air Station. White Mountain Research Station Open House, Barcroft Station.

Smallwood, K.S. and E.L. Fitzhugh. 1989. Differentiating mountain lion and dog tracks. Third Mountain Lion Workshop, Prescott, AZ.

Smith, T. R. and K. S. Smallwood. 2000. Effects of study area size, location, season, and allometry on reported *Sorex* shrew densities. Annual Meeting of the Western Section of The Wildlife Society.

Presentations at Professional Meetings and Seminars

Repowering the Altamont Pass. Altamont Symposium, The Wildlife Society – Western Section, 5 February 2017.

Developing methods to reduce bird mortality in the Altamont Pass Wind Resource Area, 1999-2007. Altamont Symposium, The Wildlife Society – Western Section, 5 February 2017.

Conservation and recovery of burrowing owls in Santa Clara Valley. Santa Clara Valley Habitat Agency, Newark, California, 3 February 2017.

Mitigation of Raptor Fatalities in the Altamont Pass Wind Resource Area. Raptor Research Foundation Meeting, Sacramento, California, 6 November 2015.

From burrows to behavior: Research and management for burrowing owls in a diverse landscape. California Burrowing Owl Consortium meeting, 24 October 2015, San Jose, California.

The Challenges of repowering. Keynote presentation at Conference on Wind Energy and Wildlife Impacts, Berlin, Germany, 10 March 2015.

Research Highlights Altamont Pass 2011-2015. Scientific Review Committee, Oakland, California, 8 July 2015.

Siting wind turbines to minimize raptor collisions: Altamont Pass Wind Resource Area. US Fish and Wildlife Service Golden Eagle Working Group, Sacramento, California, 8 January 2015.

Evaluation of nest boxes as a burrowing owl conservation strategy. Sacramento Chapter of the Western Section, The Wildlife Society. Sacramento, California, 26 August 2013.

Predicting collision hazard zones to guide repowering of the Altamont Pass. Conference on wind

power and environmental impacts. Stockholm, Sweden, 5-7 February 2013.

Impacts of Wind Turbines on Wildlife. California Council for Wildlife Rehabilitators, Yosemite, California, 12 November 2012.

Impacts of Wind Turbines on Birds and Bats. Madrone Audubon Society, Santa Rosa, California, 20 February 2012.

Comparing Wind Turbine Impacts across North America. California Energy Commission Staff Workshop: Reducing the Impacts of Energy Infrastructure on Wildlife, 20 July 2011.

Siting Repowered Wind Turbines to Minimize Raptor Collisions. California Energy Commission Staff Workshop: Reducing the Impacts of Energy Infrastructure on Wildlife, 20 July 2011.

Siting Repowered Wind Turbines to Minimize Raptor Collisions. Alameda County Scientific Review Committee meeting, 17 February 2011

Comparing Wind Turbine Impacts across North America. Conference on Wind energy and Wildlife impacts, Trondheim, Norway, 3 May 2011.

Update on Wildlife Impacts in the Altamont Pass Wind Resource Area. Raptor Symposium, The Wildlife Society—Western Section, Riverside, California, February 2011.

Siting Repowered Wind Turbines to Minimize Raptor Collisions. Raptor Symposium, The Wildlife Society - Western Section, Riverside, California, February 2011.

Wildlife mortality caused by wind turbine collisions. Ecological Society of America, Pittsburgh, Pennsylvania, 6 August 2010.

Map-based repowering and reorganization of a wind farm to minimize burrowing owl fatalities. California burrowing Owl Consortium Meeting, Livermore, California, 6 February 2010.

Environmental barriers to wind power. Getting Real About Renewables: Economic and Environmental Barriers to Biofuels and Wind Energy. A symposium sponsored by the Environmental & Energy Law & Policy Journal, University of Houston Law Center, Houston, 23 February 2007.

Lessons learned about bird collisions with wind turbines in the Altamont Pass and other US wind farms. Meeting with Japan Ministry of the Environment and Japan Ministry of the Economy, Wild Bird Society of Japan, and other NGOs Tokyo, Japan, 9 November 2006.

Lessons learned about bird collisions with wind turbines in the Altamont Pass and other US wind farms. Symposium on bird collisions with wind turbines. Wild Bird Society of Japan, Tokyo, Japan, 4 November 2006.

Responses of Fresno kangaroo rats to habitat improvements in an adaptive management framework. California Society for Ecological Restoration (SERCAL) 13th Annual Conference, UC Santa

Barbara, 27 October 2006.

Fatality associations as the basis for predictive models of fatalities in the Altamont Pass Wind Resource Area. EEI/APLIC/PIER Workshop, 2006 Biologist Task Force and Avian Interaction with Electric Facilities Meeting, Pleasanton, California, 28 April 2006.

Burrowing owl burrows and wind turbine collisions in the Altamont Pass Wind Resource Area. The Wildlife Society - Western Section Annual Meeting, Sacramento, California, February 8, 2006.

Mitigation at wind farms. Workshop: Understanding and resolving bird and bat impacts. American Wind Energy Association and Audubon Society. Los Angeles, CA. January 10 and 11, 2006.

Incorporating data from the California Wildlife Habitat Relationships (CWHR) system into an impact assessment tool for birds near wind farms. Shawn Smallwood, Kevin Hunting, Marcus Yee, Linda Spiegel, Monica Parisi. Workshop: Understanding and resolving bird and bat impacts. American Wind Energy Association and Audubon Society. Los Angeles, CA. January 10 and 11, 2006.

Toward indicating threats to birds by California's new wind farms. California Energy Commission, Sacramento, May 26, 2005.

Avian collisions in the Altamont Pass. California Energy Commission, Sacramento, May 26, 2005.

Ecological solutions for avian collisions with wind turbines in the Altamont Pass Wind Resource Area. EPRI Environmental Sector Council, Monterey, California, February 17, 2005.

Ecological solutions for avian collisions with wind turbines in the Altamont Pass Wind Resource Area. The Wildlife Society—Western Section Annual Meeting, Sacramento, California, January 19, 2005.

Associations between avian fatalities and attributes of electric distribution poles in California. The Wildlife Society - Western Section Annual Meeting, Sacramento, California, January 19, 2005.

Minimizing avian mortality in the Altamont Pass Wind Resources Area. UC Davis Wind Energy Collaborative Forum, Palm Springs, California, December 14, 2004.

Selecting electric distribution poles for priority retrofitting to reduce raptor mortality. Raptor Research Foundation Meeting, Bakersfield, California, November 10, 2004.

Responses of Fresno kangaroo rats to habitat improvements in an adaptive management framework. Annual Meeting of the Society for Ecological Restoration, South Lake Tahoe, California, October 16, 2004.

Lessons learned from five years of avian mortality research at the Altamont Pass Wind Resources Area in California. The Wildlife Society Annual Meeting, Calgary, Canada, September 2004.

The ecology and impacts of power generation at Altamont Pass. Sacramento Petroleum Association,

Sacramento, California, August 18, 2004.

Burrowing owl mortality in the Altamont Pass Wind Resource Area. California Burrowing Owl Consortium meeting, Hayward, California, February 7, 2004.

Burrowing owl mortality in the Altamont Pass Wind Resource Area. California Burrowing Owl Symposium, Sacramento, November 2, 2003.

Raptor Mortality at the Altamont Pass Wind Resource Area. National Wind Coordinating Committee, Washington, D.C., November 17, 2003.

Raptor Behavior at the Altamont Pass Wind Resource Area. Annual Meeting of the Raptor Research Foundation, Anchorage, Alaska, September, 2003.

Raptor Mortality at the Altamont Pass Wind Resource Area. Annual Meeting of the Raptor Research Foundation, Anchorage, Alaska, September, 2003.

California mountain lions. Ecological & Environmental Issues Seminar, Department of Biology, California State University, Sacramento, November, 2000.

Intra- and inter-turbine string comparison of fatalities to animal burrow densities at Altamont Pass. National Wind Coordinating Committee, Carmel, California, May, 2000.

Using a Geographic Positioning System (GPS) to map wildlife and habitat. Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.

Suggested standards for science applied to conservation issues. Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.

The indicators framework applied to ecological restoration in Yolo County, California. Society for Ecological Restoration, September 25, 1999.

Ecological restoration in the context of animal social units and their habitat areas. Society for Ecological Restoration, September 24, 1999.

Relating Indicators of Ecological Health and Integrity to Assess Risks to Sustainable Agriculture and Native Biota. International Conference on Ecosystem Health, August 16, 1999.

A crosswalk from the Endangered Species Act to the HCP Handbook and real HCPs. Southern California Edison, Co. and California Energy Commission, March 4-5, 1999.

Mountain lion track counts in California: Implications for Management. Ecological & Environmental Issues Seminar, Department of Biological Sciences, California State University, Sacramento, November 4, 1998.

“No Surprises” -- Lack of science in the HCP process. California Native Plant Society Annual Conservation Conference, The Presidio, San Francisco, September 7, 1997.

In Your Interest. A half hour weekly show aired on Channel 10 Television, Sacramento. In this episode, I served on a panel of experts discussing problems with the implementation of the Endangered Species Act. Aired August 31, 1997.

Spatial scaling of pocket gopher (*Geomyidae*) density. Southwestern Association of Naturalists 44th Meeting, Fayetteville, Arkansas, April 10, 1997.

Estimating prairie dog and pocket gopher burrow volume. Southwestern Association of Naturalists 44th Meeting, Fayetteville, Arkansas, April 10, 1997.

Ten years of mountain lion track survey. Fifth Mountain Lion Workshop, San Diego, February 27, 1996.

Study and interpretive design effects on mountain lion density estimates. Fifth Mountain Lion Workshop, San Diego, February 27, 1996.

Small animal control. Session moderator and speaker at the California Farm Conference, Sacramento, California, Feb. 28, 1995.

Small animal control. Ecological Farming Conference, Asylomar, California, Jan. 28, 1995.

Habitat associations of the Swainson's Hawk in the Sacramento Valley's agricultural landscape. 1994 Raptor Research Foundation Meeting, Flagstaff, Arizona.

Alfalfa as wildlife habitat. Seed Industry Conference, Woodland, California, May 4, 1994.

Habitats and vertebrate pests: impacts and management. Managing Farmland to Bring Back Game Birds and Wildlife to the Central Valley. Yolo County Resource Conservation District, U.C. Davis, February 19, 1994.

Management of gophers and alfalfa as wildlife habitat. Orland Alfalfa Production Meeting and Sacramento Valley Alfalfa Production Meeting, February 1 and 2, 1994.

Patterns of wildlife movement in a farming landscape. Wildlife and Fisheries Biology Seminar Series: Recent Advances in Wildlife, Fish, and Conservation Biology, U.C. Davis, Dec. 6, 1993.

Alfalfa as wildlife habitat. California Alfalfa Symposium, Fresno, California, Dec. 9, 1993.

Management of pocket gophers in Sacramento Valley alfalfa. California Alfalfa Symposium, Fresno, California, Dec. 8, 1993.

Association analysis of raptors in a farming landscape. Plenary speaker at Raptor Research Foundation Meeting, Charlotte, North Carolina, Nov. 6, 1993.

Landscape strategies for biological control and IPM. Plenary speaker, International Conference on Integrated Resource Management and Sustainable Agriculture, Beijing, China, Sept. 11, 1993.

Landscape Ecology Study of Pocket Gophers in Alfalfa. Alfalfa Field Day, U.C. Davis, July 1993.

Patterns of wildlife movement in a farming landscape. Spatial Data Analysis Colloquium, U.C. Davis, August 6, 1993.

Sound stewardship of wildlife. Veterinary Medicine Seminar: Ethics of Animal Use, U.C. Davis. May 1993.

Landscape ecology study of pocket gophers in alfalfa. Five County Grower's Meeting, Tracy, California. February 1993.

Turbulence and the community organizers: The role of invading species in ordering a turbulent system, and the factors for invasion success. Ecology Graduate Student Association Colloquium, U.C. Davis. May 1990.

Evaluation of exotic vertebrate pests. Fourteenth Vertebrate Pest Conference, Sacramento, California. March 1990.

Analytical methods for predicting success of mammal introductions to North America. The Western Section of the Wildlife Society, Hilo, Hawaii. February 1988.

A state-wide mountain lion track survey. Sacramento County Dept Parks and Recreation. April 1986.

The mountain lion in California. Davis Chapter of the Audubon Society. October 1985.

Ecology Graduate Student Seminars, U.C. Davis, 1985-1990: Social behavior of the mountain lion; Mountain lion control; Political status of the mountain lion in California.

Other forms of Participation at Professional Meetings

- Scientific Committee, Conference on Wind energy and Wildlife impacts, Berlin, Germany, March 2015.

- Scientific Committee, Conference on Wind energy and Wildlife impacts, Stockholm, Sweden, February 2013.

- Workshop co-presenter at Birds & Wind Energy Specialist Group (BAWESG) Information sharing week, Bird specialist studies for proposed wind energy facilities in South Africa, Endangered Wildlife Trust, Darling, South Africa, 3-7 October 2011.

- Scientific Committee, Conference on Wind energy and Wildlife impacts, Trondheim, Norway, 2-5 May 2011.

- Chair of Animal Damage Management Session, The Wildlife Society, Annual Meeting, Reno, Nevada, September 26, 2001.

- Chair of Technical Session: Human communities and ecosystem health: Comparing perspectives and making connection. Managing for Ecosystem Health, International Congress on Ecosystem Health, Sacramento, CA August 15-20, 1999.

- Student Awards Committee, Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.

- Student Mentor, Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.

Printed Mass Media

Smallwood, K.S., D. Mooney, and M. McGuinness. 2003. We must stop the UCD biolab now. Op-Ed to the Davis Enterprise.

Smallwood, K.S. 2002. Spring Lake threatens Davis. Op-Ed to the Davis Enterprise.

Smallwood, K.S. Summer, 2001. Mitigation of habitation. The Flatlander, Davis, California.

Entrikan, R.K. and K.S. Smallwood. 2000. Measure O: Flawed law would lock in new taxes. Op-Ed to the Davis Enterprise.

Smallwood, K.S. 2000. Davis delegation lobbies Congress for Wildlife conservation. Op-Ed to the Davis Enterprise.

Smallwood, K.S. 1998. Davis Visions. The Flatlander, Davis, California.

Smallwood, K.S. 1997. Last grab for Yolo's land and water. The Flatlander, Davis, California.

Smallwood, K.S. 1997. The Yolo County HCP. Op-Ed to the Davis Enterprise.

Radio/Television

PBS News Hour,

FOX News, Energy in America: Dead Birds Unintended Consequence of Wind Power Development, August 2011.

KXJZ Capital Public Radio -- Insight (Host Jeffrey Callison). Mountain lion attacks (with guest Professor Richard Coss). 23 April 2009;

KXJZ Capital Public Radio -- Insight (Host Jeffrey Callison). Wind farm Rio Vista Renewable Power. 4 September 2008;

KQED QUEST Episode #111. Bird collisions with wind turbines. 2007;

KDVS Speaking in Tongues (host Ron Glick), Yolo County HCP: 1 hour. December 27, 2001;

KDVS Speaking in Tongues (host Ron Glick), Yolo County HCP: 1 hour. May 3, 2001;

KDVS Speaking in Tongues (host Ron Glick), Yolo County HCP: 1 hour. February 8, 2001;

KDVS Speaking in Tongues (host Ron Glick & Shawn Smallwood), California Energy Crisis: 1 hour. Jan. 25, 2001;

KDVS Speaking in Tongues (host Ron Glick), Headwaters Forest HCP: 1 hour. 1998;

Davis Cable Channel (host Gerald Heffernon), Burrowing owls in Davis: half hour. June, 2000;

Davis Cable Channel (hosted by Davis League of Women Voters), Measure O debate: 1 hour. October, 2000;

KXTV 10, In Your Interest, The Endangered Species Act: half hour. 1997.

Reviews of Journal Papers (Scientific journals for whom I've provided peer review)

Journal	**Journal**
American Naturalist	Journal of Animal Ecology
Journal of Wildlife Management	Western North American Naturalist
Auk	Journal of Raptor Research
Biological Conservation	National Renewable Energy Lab reports
Canadian Journal of Zoology	Oikos
Ecosystem Health	The Prairie Naturalist
Environmental Conservation	Restoration Ecology
Environmental Management	Southwestern Naturalist
Functional Ecology	The Wildlife Society--Western Section Trans.
Journal of Zoology (London)	Proc. Int. Congress on Managing for Ecosystem Health
Journal of Applied Ecology	Transactions in GIS
Ecology	Tropical Ecology
Wildlife Society Bulletin	Peer J
Biological Control	The Condor

Committees

- Scientific Review Committee, Alameda County, Altamont Pass Wind Resource Area
- Ph.D. Thesis Committee, Steve Anderson, University of California, Davis
- MS Thesis Committee, Marcus Yee, California State University, Sacramento

Other Professional Activities or Products

Testified in Federal Court in Denver during 2005 over the fate of radio-nuclides in the soil at Rocky Flats Plant after exposure to burrowing animals. My clients won a judgment of $553,000,000. I have also testified in many other cases of litigation under CEQA, NEPA, the Warren-Alquist Act, and other environmental laws. My clients won most of the cases for which I testified.

Testified before Environmental Review Tribunals in Ontario, Canada regarding proposed White Pines, Amherst Island, and Fairview Wind Energy projects.

Testified in Skamania County Hearing in 2009 on the potential impacts of zoning the County for development of wind farms and hazardous waste facilities.

Testified in deposition in 2007 in the case of O'Dell et al. vs. FPL Energy in Houston, Texas.

Testified in Klickitat County Hearing in 2006 on the potential impacts of the Windy Point Wind Farm.

Memberships in Professional Societies

The Wildlife Society
Raptor Research Foundation

Honors and Awards

Fulbright Research Fellowship to Indonesia, 1987
J.G. Boswell Full Academic Scholarship, 1981 college of choice
Certificate of Appreciation, The Wildlife Society—Western Section, 2000, 2001
Northern California Athletic Association Most Valuable Cross Country Runner, 1984
American Legion Award, Corcoran High School, 1981, and John Muir Junior High, 1977
CIF Section Champion, Cross Country in 1978
CIF Section Champion, Track & Field 2 mile run in 1981
National Junior Record, 20 kilometer run, 1982
National Age Group Record, 1500 meter run, 1978

Community Activities

District 64 Little League Umpire, 2003-2007
Dixon Little League Umpire, 2006-07
Davis Little League Chief Umpire and Board member, 2004-2005
Davis Little League Safety Officer, 2004-2005
Davis Little League Certified Umpire, 2002-2004
Davis Little League Scorekeeper, 2002
Davis Visioning Group member
Petitioner for Writ of Mandate under the California Environmental Quality Act against City of Woodland decision to approve the Spring Lake Specific Plan, 2002
Served on campaign committees for City Council candidates

Representative Clients/Funders

Law Offices of Stephan C. Volker
Blum Collins, LLP
Eric K. Gillespie Professional Corporation
Law Offices of Berger & Montague
Lozeau | Drury LLP
Law Offices of Roy Haber
Law Offices of Edward MacDonald
Law Office of John Gabrielli
Law Office of Bill Kopper
Law Office of Donald B. Mooney
Law Office of Veneruso & Moncharsh
Law Office of Steven Thompson
Law Office of Brian Gaffney
California Wildlife Federation
Defenders of Wildlife
Sierra Club
National Endangered Species Network
Spirit of the Sage Council
The Humane Society
Hagens Berman LLP
Environmental Protection Information Center
Goldberg, Kamin & Garvin, Attorneys at Law
Californians for Renewable Energy (CARE)
Seatuck Environmental Association
Friends of the Columbia Gorge, Inc.
Save Our Scenic Area
Alliance to Protect Nantucket Sound
Friends of the Swainson's Hawk
Alameda Creek Alliance
Center for Biological Diversity
California Native Plant Society
Endangered Wildlife Trust
and BirdLife South Africa
AquAlliance
Oregon Natural Desert Association
Save Our Sound
G3 Energy and Pattern Energy
Emerald Farms
Pacific Gas & Electric Co.
Southern California Edison Co.
Georgia-Pacific Timber Co.
Northern Territories Inc.
David Magney Environmental Consulting
Wildlife History Foundation
NextEra Energy Resources, LLC
Ogin, Inc.
EDF Renewables
National Renewable Energy Lab
Altamont Winds LLC
Salka Energy
Comstocks Business (magazine)
BioResource Consultants
Tierra Data
Black and Veatch
Terry Preston, Wildlife Ecology Research Center
EcoStat, Inc.
US Navy
US Department of Agriculture
US Forest Service
US Fish & Wildlife Service
US Department of Justice
California Energy Commission
California Office of the Attorney General
California Department of Fish & Wildlife
California Department of Transportation
California Department of Forestry
California Department of Food & Agriculture
Ventura County Counsel
County of Yolo
Tahoe Regional Planning Agency
Sustainable Agriculture Research & Education Program
Sacramento-Yolo Mosquito and Vector Control District
East Bay Regional Park District
County of Alameda
Don & LaNelle Silverstien
Seventh Day Adventist Church
Escuela de la Raza Unida
Susan Pelican and Howard Beeman
Residents Against Inconsistent Development, Inc.
Bob Sarvey
Mike Boyd
Hillcroft Neighborhood Fund
Joint Labor Management Committee, Retail Food Industry
Lisa Rocca
Kevin Jackson
Dawn Stover and Jay Letto
Nancy Havassy
Catherine Portman (for Brenda Cedarblade)
Ventus Environmental Solutions, Inc.
Panorama Environmental, Inc.
Adams Broadwell Professional Corporation

Representative special-status species experience

Common name	Species name	Description
Field experience		
California red-legged frog	*Rana aurora draytonii*	Protocol searches; Many detections
Foothill yellow-legged frog	*Rana boylii*	Presence surveys; Many detections
Western spadefoot	*Spea hammondii*	Presence surveys; Few detections
California tiger salamander	*Ambystoma californiense*	Protocol searches; Many detections
Coast range newt	*Taricha torosa torosa*	Searches and multiple detections
Blunt-nosed leopard lizard	*Gambelia sila*	Detected in San Luis Obispo County
California horned lizard	*Phrynosoma coronatum frontale*	Searches; Many detections
Western pond turtle	*Clemmys marmorata*	Searches; Many detections
San Joaquin kit fox	*Vulpes macrotis mutica*	Protocol searches; detections
Sumatran tiger	*Panthera tigris*	Track surveys in Sumatra
Mountain lion	*Puma concolor californicus*	Research and publications
Point Arena mountain beaver	*Aplodontia rufa nigra*	Remote camera operation
Giant kangaroo rat	*Dipodomys ingens*	Detected in Cholame Valley
San Joaquin kangaroo rat	*Dipodomys nitratoides*	Monitoring & habitat restoration
Monterey dusky-footed woodrat	*Neotoma fuscipes luciana*	Non-target captures and mapping of dens
Salt marsh harvest mouse	*Reithrodontomys raviventris*	Habitat assessment, monitoring
Salinas harvest mouse	*Reithrodontomys megalotus distichlus*	Captures; habitat assessment
Bats		Thermal imaging surveys
California clapper rail	*Rallus longirostris*	Surveys and detections
Golden eagle	*Aquila chrysaetos*	Numerical & behavioral surveys
Swainson's hawk	*Buteo swainsoni*	Numerical & behavioral surveys
Northern harrier	*Circus cyaeneus*	Numerical & behavioral surveys
White-tailed kite	*Elanus leucurus*	Numerical & behavioral surveys
Loggerhead shrike	*Lanius ludovicianus*	Large area surveys
Least Bell's vireo	*Vireo bellii pusillus*	Detected in Monterey County
Willow flycatcher	*Empidonax traillii extimus*	Research at Sierra Nevada breeding sites
Burrowing owl	*Athene cunicularia hypugia*	Numerical & behavioral surveys
Valley elderberry longhorn beetle	*Desmocerus californicus dimorphus*	Monitored success of relocation and habitat restoration
Analytical		
Arroyo southwestern toad	*Bufo microscaphus californicus*	Research and report.
Giant garter snake	*Thamnophis gigas*	Research and publication
Northern goshawk	*Accipiter gentilis*	Research and publication
Northern spotted owl	*Strix occidentalis*	Research and reports
Alameda whipsnake	*Masticophis lateralis euryxanthus*	Expert testimony

ATTACHMENT 1

Skilled Dog Detections of Bat and Small Bird Carcasses in Wind Turbine Fatality Monitoring

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Jack searches for fatalities in the Altamont Pass, 2017

It is imperative that scientists learn whether preconstruction surveys can generate data and metrics, such as passage rates and accurate fatality rates, that can predict wind turbine impacts on bats and small birds and that can help minimize impacts via micro-siting. Recent research in the Altamont Pass Wind Resource Area (APWRA) revealed high fatality rates of bats (Brown et al. 2016) and small birds (Smallwood 2016a), but these estimated rates carried large uncertainty due to very low carcass detection rates using human searchers. That the mean fatality rate estimates might be realistic was supported by hundreds of hours of nocturnal surveys in the APWRA using a FLIR T620 thermal camera with an 88 mm lens (Smallwood 2016a,b). The nocturnal surveys accumulated hundreds of documented near misses of bats and small birds and at least 8 collisions of bats with wind turbine blades or with the atmospheric pressure waves and wake turbulence created by the blade sweeps. Bats were often seen to tumble through the air and sometimes disappeared around the blade sweeps. Bats were also seen to target wind turbines, often pass through operating wind turbine rotors multiple times each, and to chase blades as they swept through their rotations. Other investigators also noticed these patterns (Kunz et al. 2007, Horn et al. 2008, Cryan et al. 2014). Also, large bats (likely hoary bats, *Lasiurus cinereus*) behaved differently than smaller bats (mostly Mexican free-tailed bats, *Tadarida brasiliensis*), and certain behaviors appeared to associate with the frequencies of near misses.

As higher-than-expected bat fatality rates emerge from fatality monitoring at repowered wind turbines, the question arises whether macro- and micro-siting of wind turbines might help to minimize impacts to bats or small birds. Micro-siting has been shown to reduce raptor fatalities at a repowered wind project (Brown et al. 2016), and offers considerable promise for minimizing specific avian impacts at proposed new wind projects (Smallwood et al. 2017). Still unknown is whether use of acoustic detectors in preconstruction surveys or post-construction monitoring can accurately predict bat collision risks. Also still unknown is whether monitoring bat activity using acoustic detectors can generate collision risk metrics that accurately predict impacts at a spatial resolution fine enough for micro-siting of wind turbines. Fatality rates need to be compared to bat passage rates recorded over overlapping time periods to determine whether there is a relationship.

Hein et al. (2013) failed to obtain a significant positive correlation between bat fatality rates and passage rates through turbine rotors among multiple wind projects in Canada and the USA. Even though there has been considerable interest in this relationship since that time, scientific support for it has not advanced beyond speculation. One constraint in acoustic detectors is their range, which is typically 30 m, or <1/3 of the rotor diameter of a modern wind turbine. In addition, if a detector is directional or if the nacelle blocks incoming bat calls from a portion of the rotor, the detector's effective coverage of the rotor may be much smaller. Using a thermal camera, one of us (KSS) has recorded bats passing through all parts of the rotor, disproportionately at the edge of the rotor plane where nacelle-mounted acoustic detectors would fail to detect bat passages. Therefore, acoustic detectors might not serve as the technology best suited for obtaining bat passage rates to be compared to fatality rates.

Another possible explanation for Hein et al.'s lack of correlation could be that an attraction of bats to wind turbines might prevent discernment of any meaningful pattern between passage rates and fatality rates. If bats are strongly attracted to wind turbines, as some have posited (Kunz et al. 2007, Horn et al. 2008, Cryan et al. 2014, Smallwood 2016b), then it might be that preconstruction surveys simply cannot predict fatality rates because once new wind turbines are installed bats will shift their preconstruction flight paths to visit the new turbines. Nevertheless, in certain landscapes bat passage rates might provide useful patterns for guiding micro-siting. Furthermore, rather than passage rates being predictive of fatalities, what might be more predictive are certain behavior rates – e.g., hovering, interacting with other bats, making foraging runs, chasing blades, passing through the rotor parallel rather than perpendicular to the rotor plane, approaching portions of the rotor emitting disproportionately greater heat – and one or more of these behavior rates might very well relate to landscape settings.

Yet another possible explanation for Hein et al.'s lack of correlation could be high uncertainty in fatality rate estimates. Fatality rate estimates have been vulnerable to large biases and error caused by unrealistic field trials and weak fatality monitoring methods (Smallwood 2007, Smallwood et al. 2010, 2013). Accuracy in fatality rate estimates would increase by detecting more of the fatalities, and in more effectively addressing biases such as use of inadequate maximum search radii. Matthews et al. (2013) argued that use of skilled dogs would increase carcass detection rates, a method that we employed here. Other approaches would be to decrease the time interval between searches and to increase the maximum search radius around wind turbines.

The scientific basis for deciding on a maximum search radius has been scarce. Hull and Muir (2010) proposed a method based on ballistics, and Smallwood (2013) proposed a method based on modeling the pattern of carcass deposition within previously searched areas. Huso et al. (2014, 2017) also proposed modeling the pattern of carcass deposition, but the proposed metric consisted of the density of carcasses (carcasses/m^2) as opposed to Smallwood's (2013) cumulative number of carcasses with increasing distance from the turbine. Huso et al. (2014, 2017) further proposed that monitoring can be more efficient by concentrating efforts near the turbine tower where carcass densities were higher at one cited project site. Given the types of detection trials we deployed in this study, and our use of dogs to improve carcass detection, we had the opportunity to more closely examine searcher detection and carcass distributions around wind turbines.

It needs to be known whether preconstruction surveys can generate useful passage rate metrics of bats and small birds, and whether post-construction fatality rates of bats and small birds can be estimated with sufficient accuracy to discover meaningful patterns with passage rates. The primary objectives of this study were to test the efficacy of using skilled dogs relative to human searchers to find available fatalities and to relate fatality finds to patterns of bat and small bird activity at wind turbines during the night preceding fatality searches. We aimed to more closely compare wind turbine fatalities to passage rates or behavior rates, near-misses, or angles of entry to the rotor plane observed the night before each fatality search. We needed this close comparison because fatality monitoring is a contest between investigators and scavengers over who might find the fatalities first. The longer the time interval between searches, the more likely scavengers will remove evidence of fatalities from the search area before investigators can detect them. A key element to this close comparison is the use of carcass detection trials, in which we place bat and small bird carcasses into the search areas without the searchers being aware of placement details such as location, species or number of carcasses. However, this report is interim to a final report that will make use of the nocturnal survey data to measure bat passage rates with fatality rates. The objectives of this interim report are to (1) test whether carcass detection rates are higher using dogs than humans as fatality searchers, (2) examine patterns of carcass deposition around wind turbines in an effort to assess the suitability of earlier and ongoing maximum search radii, (3) test for an effect on fatalities caused by a serendipitous, project-wide wind turbine shutdown in the midst of the bat migration season.

METHODS

To achieve our ultimate goal of comparing bat passage rates to fatality rates, we sought to maximize our detection of bat fatalities by conducting fieldwork through the peak period of bat activity and documented fatalities in the APWRA. This period includes the last week in September and the first week of October, which also happens to generally coincide with a peak in small bird flights through the APWRA at night. We surveyed for bats and small birds 4 September through 15 November 2018. Nocturnal surveys lasted 3 hours per night, and fatality surveys were performed at the same turbines the following morning, 5 days per week. Nocturnal surveys included at least 1 round of 5-10 minute scans per turbine per hour. Each night nocturnal surveys covered 2 to 5 wind turbines, which were searched for fatalities the following morning.

Nocturnal surveys were performed between dusk and 3 hours after dusk, which is the time period corresponding with most bat activity. We recorded temperature, wind direction, and wind speed each hour using a Kestrel wind meter. Using the thermal camera we also recorded temperatures of ground cover and the vents at the rear of wind turbine nacelles. In between timed passage rate surveys, we surveyed for individual bats and birds, which upon detection were tracked by panning the thermal camera to keep pace with the bat or bird to determine whether it targeted one or more wind turbines. Each timed scan was also video-recorded so that observations could be verified and any missed bat or bird passages recorded upon later viewing of the video.

Our fatality searches were performed by our dog team consisting of Collette Yee, a trained dog handler, who worked with one of two trained dogs at a time, Captain and Jack, and was accompanied by Skye Standish. Captain and Jack were trained by Conservation Canines with the Center of Conservation Biology, University of Washington. Our dog team searched 5 days per week, 15 September through 15 November. Searches were performed in the morning, when conditions were optimal for searching with dogs. Each dog was given turns at searching, then rested as the other dog took a turn. Search areas extended to 75 m from 31 1-MW Mitsubishi wind turbines in the Buena Vista Wind Energy project and to 105 m from 32 1.79-MW wind turbines in the Golden Hills Wind Energy project. Daily searches covered 2 to 3 turbines at Golden Hills or 3 to 5 turbines at Buena Vista. Dogs were led by leash along transects oriented perpendicular to the wind and separated by 10 m over most of the search area. The exception was within a 90° arc between 210° and 300° from the turbine, which corresponds with prevailing upwind directions in the APWRA. Within this 90° arc we allowed dogs off leash for a more cursory search, because in our experience few bat and small bird fatalities are found upwind of wind turbines (Smallwood 2016a, Brown et al. 2016). Within the intensive search areas we navigated transects using GPS and a Locus Map application on a phone along with visible flagging as needed. We tracked dogs using a Keychain Finder Transystem 860e GPS data logger. Standish mapped and photographed fatality finds using a Trimble GeoExplorer 6000 GPS unit, and identified carcasses to species. Found carcasses were left in place for possible repeat discovery.

At Golden Hills our dog team searched for fatalities at 32 wind turbines that were also searched by the onsite fatality monitor (H.T. Harvey and Associates 2017) at 28-day intervals. On 19 September the fatality monitor switched from using dogs to using human searchers at the 32 turbines we searched. Human searchers and the dog team were blind to each other's fatality finds, but the dog team informed the human searchers of our trial carcass placements (described below). Also, the human searchers removed found fatalities, except for our trial carcasses. Over the same time period the dog team performed 55 searches at the same 32 turbines where the human searchers performed 69 searches. We later compared the fatality finds between the dog team and human searchers.

Within the intensively searched areas downwind of wind turbines at Golden Hills and Buena Vista, Smallwood deposited fresh carcasses of bats and small birds the day prior to each fatality search (Table 1). Placements were to randomized locations within the fatality search areas. Smallwood weighed trial carcasses prior to placements, and he clipped the tips of flight feathers of birds and removed one foot from bats. These carcasses served as fatality detection trials that

are typically used to adjust fatality finds to fatality rates (Brown et al. 2016, Smallwood 2017, Smallwood et al. unpublished). The fatality searchers were blind to the trials, and reported them in the same manner as turbine-caused fatalities, except that searchers also reported whether bird carcasses had clipped flight feathers or bat carcasses lacked one foot. Smallwood followed-up on trial carcass placements with status-checks. Carcasses were left in the field indefinitely at Buena Vista. At Golden Hills, we were required to remove bat carcasses following the dog team's search, and we removed bird carcasses after obtaining persistence rates via carcass status checks.

We implemented two additional types of detection trial to test whether time since death and time in the field might affect detection rates. At Buena Vista, Smallwood placed fresh frozen bird carcasses on randomized days up to two weeks prior to the next fatality search to test whether carcasses persisting in the field longer than a day were detected at the same rates as those placed one day prior to the search. Because we were required to remove bat trial carcasses from Golden Hills after our first search attempt, we relocated persisting carcasses to Buena Vista to test whether carcasses thawed an extra 1 to 4 days prior to placement affected detection rates (Table 1).

Using only the fresh carcasses and carcass status checks using both the trial administrator and our dog team searches, we estimated daily mean carcass persistence rates, R_c, defined as the mean proportion of carcasses remaining following the average time interval (days) between searches:

$$R_c = \frac{\sum_{i=1}^{I} R_i}{I} \ ,$$

where R_i was the predicted proportion of carcasses remaining at the ith day into the trial, based on nonlinear regression used to fit a predictive model to the data, and I was the number of days into the trial which corresponded with the average interval between the fatality searches. The number of found fatalities would be divided by R_c to derive a fatality estimate adjusted for the proportion of fatalities not found due to scavenger removal.

Patterns of Found Fatalities around Wind Turbines

Fatality rates are less comparable between wind projects unless one accounts for variation in combinations of tower heights and maximum fatality search radius (Smallwood 2009, 2013, Hull and Muir 2010, Kitano and Shiraki 2013, Loss et al. 2013). These combinations partly determine the proportion of fatalities that are found, because some proportion of birds and bats end up outside the search area and are never discovered. The adjustment factor, d, represents the proportion of carcasses likely to be found within the maximum search radius around wind turbines of given tower heights. To obtain d in fatality rate equation 1, Smallwood (2013) reviewed tables and appendices in available reports to obtain distances of fatalities from wind turbines. Fatality finds were summed within 1-m intervals of distance from the turbines for each group of tower heights and each group of maximum search radii, and least-squares regression analysis was used to fit logistic functions to the cumulative sum fatalities with increasing distance from the turbine. The regressions were restricted to the distance of the maximum search

radius plus 5 m to account for the area likely searched as the searcher reached the search boundary. In all cases, a logistic function was fit to the data, iteratively changing the upper bound value of the dependent variable in the model until the minimum root mean square error (RMSE) was obtained:

$$Y = \frac{1}{\left(\frac{1}{u} + a \times b^{X}\right)},$$

where *u* was the upper bound value of the cumulative proportion of found fatalities, Y, X was meters from wind turbine where nearest fatality remains were located, and *a* and *b* were fitted coefficients.

The regression models were used to predict cumulative sum fatalities as functions of distance from the turbine, which were then extended to distances beyond the maximum search radii that were reported at wind-energy projects (Smallwood 2013). These model predictions were extended to greater distances to identify asymptotic values, which were then divided into predicted values at each 1-m interval to represent the predicted value as a proportion of the asymptotic value. The result was a predicted cumulative proportion of fatalities relative to the predicted maximum (1.0) that would have been found had the searches extended well beyond the search boundary. New models were developed from data collected during our study.

Impact of Turbine Shutdown on Volant Wildlife

Before our study began, we learned that the Buena Vista project was scheduled for shutdown 2 October through 10 November to repair a circuit. This shutdown provided an opportunity to test whether wind project curtailment reduces bat and bird fatalities. To compare impacts of a project-wide turbine shutdown, we measured the change in fatality finds per search before and after the Buena Vista shutdown. The Golden Hills turbines served as the control group, because they continued to operate before and after the Buena Vista shutdown. We took the ratio of post-shutdown fatality rates to pre-shutdown fatality rates in the control group and multiplied it by the pre-shutdown fatality rate at Buena Vista to obtain an expected value. We took the difference between the expected value and the average fatality rate after the Buena Vista shutdown and divided this difference by the expected value to calculate the change in fatalities due to the shutdown:

$$E[I_A] = (C_B - C_A) \times I_B,$$
$$IMPACT = \frac{(E[I_A] - I_A)}{E[I_A]} \times 100\%,$$

where C_B and C_A were fatalities/search at the control site (Golden Hills) before and after the Buena Vista shutdown, I_B and I_A were fatalities/search at the impact site (Buena Vista) before and after the shutdown, $E[I_A]$ was the expected post-shutdown fatalities/search at Buena Vista, and IMPACT was the effect of the shutdown on fatalities/search, which could also be translated to the number of fatalities by multiplying IMPACT and the number of post-shutdown searches.

RESULTS

Fatality Searches

We performed 151 fatality searches at 63 wind turbines from 4 September through 15 November 2017, 20 searches using only a human searcher through 13 September, and 131 searches using dogs thereafter. Skye Standish searched 20 turbines once each from 4 through 13 September 2017. Captain and Jack – our trained dogs – searched 15 turbines once each and another 48 turbines twice to four times per turbine, averaging 25 day intervals between searches (range 2 to 53 day intervals). At Golden Hills, our dog team searched 32 turbines that were being searched every 28 days by human searchers after 19 September. Of these turbines, our dog team searched 12 turbines once, 17 turbines twice, and 3 turbines three times for a project total of 55 turbine searches. At Buena Vista, our dog team searched 3 turbines once, 15 turbines twice, 9 turbines three times, and 4 turbines four times for a project total of 76 turbine searches.

Buena Vista experienced a planned project-wide shutdown beginning 06:00 hours on 2nd October. This shutdown extended through the remainder of the study period. Our dog team performed 28 turbine searches (26 turbines) at Buena Vista on or before the shutdown date, and 48 turbine searches (31 turbines) afterwards. They searched 14 turbines at Golden Hills prior to the Buena Vista shutdown, and performed 41 turbine searches (31 turbines) afterwards. Results from these searches were examined in a before-after, control-impact experimental design to test the degree to which operating turbines contribute to fatalities found at wind turbines.

Between both projects, we found carcasses of 9 bats and 43 birds that we believe had died prior to the start of our study. Also between both projects, our human searches performed in early September detected 2 bats that had died after the start of our study and 10 birds that died prior to the study. The human-found bats included a western red bat and hoary bat at Buena Vista. The human-found birds included 1 turkey vulture, 1 golden eagle, 2 red-tailed hawks, 1 American kestrel, 2 burrowing owls, 1 mourning dove, 1 horned lark, and 1 unidentified large bird. The human-found searches will not factor into the remainder of our results. Species found by our dog team are listed in Table 2.

We found 8 of the 21 birds reported to have been found and removed by human searchers at Golden Hills, meaning that either we found 8 birds prior the human searchers' removal of them or we detected residual evidence after the removals, i.e., incomplete removals. We found 3 of the 7 red-tailed hawks found by human searchers, 2 of which were found on the same day by our dog team and the monitor's human searcher. We found 2 of their 3 burrowing owls, the one mallard they found, and 1 of 2 horned larks. We did not find the 1 Mexican free-tailed bat found by human searchers, or the 1 golden eagle, 1 ferruginous hawk, and other birds. Except for large birds, the human searchers' practice of removing found carcasses probably had little impact on our study results.

During the period of our fatality searches using dogs, we found 24 bats and 26 birds at Buena Vista and 71 bats and 63 birds at Golden Hills (Table 2). Whereas our dog team failed to detect the one bat found by human searchers, likely because it had been removed by the human searchers after discovery, the human searchers found none of the 71 bats that our dogs found and

which we left in the field to be potentially found by human searchers (some of these bats would have been removed by scavengers between our detections of them and the next human search).

Detection Trials

Of 278 trial placements, 214 were available to be found by dogs during at least one search. Most of the remainder had been removed by scavengers prior to the first search following placement, and a few were mistakenly placed outside the search areas.

Of the trial carcasses placed for the first time and shortly before the next fatality search, and hence confirmed available to searchers, our dogs detected 96% of bats and 90% of birds between both projects. Our dogs found 100% of 41 bats placed at Golden Hills and 93% of 54 bats placed at Buena Vista. They found 84% of 56 birds placed at Golden Hills and 91% of 32 birds placed at Buena Vista. For comparison, at Golden Hills the dog search team of H.T. Harvey (2017) found 77% of 35 placed bats and 53% of 26 placed small birds that were confirmed available to be found the previous fall, 2016.

We also quantified detection rates of all searcher exposures to carcasses, whether just placed or those persisting through multiple searches and subjected to trial testing each time. Of these, our dogs found 95% of 132 bat trials and 91% of 101 bird trials between both projects. Our dogs found 100% of 44 bat trials at Golden Hills and 92% of 88 bat trials at Buena Vista. They found 88% of 57 bird trials at Golden Hills and 95% of 44 bird trials at Buena Vista.

Because we were required to remove bats soon after trial completion at Golden Hills, we relocated these bat carcasses to Buena Vista as special trials to test dogs on older carcasses (Table 1). All of these bats had persisted 1 to 4 days of trial placements at Golden Hills prior to relocation. Our dogs detected 87.5% of 24 relocated bats confirmed to be available for detection.

We also placed 36 bird carcasses on randomized days at Buena Vista to vary the days since placement by up to two weeks (Table 1). Our dogs detected 36% of these carcasses, but they found 100% of 13 that had persisted through the next fatality search. The 64% that were undetected had already been removed by scavengers.

For our dog team, mean distance to carcass occlusion did not differ significantly between trial carcasses that were detected versus missed for bats, birds, and bats and birds pooled together (t-tests, $P > 0.05$). Nor did mean $\log_{10}$ body mass differ significantly between trial carcasses that were detected versus those missed for bats, birds, and bats and birds pooled together (t-tests, $P > 0.05$). That body mass was not a factor was especially interesting for bats, of which the smallest was a dried out carcass of 1 g, and many of which consisted of immature bats that had fallen out of a nest box. Among birds, the dogs had no problem finding hummingbirds and many chicks of various songbird species. The mean number of fatality (and trial) finds on a particular day did not differ significantly between trial carcasses that were detected versus missed for bats, birds, and bats and birds pooled together (t-tests, $P > 0.05$).

Of the 7 bats that were missed by dogs, 3 had been relocated from Golden Hills to Buena Vista (they had been found at Golden Hills, but relocated to test dogs on bats having been in the field

>1 day). Missed relocated bats included 2 adult little brown bats and one adult Mexican free-tailed bat that had persisted at Golden Hills 2-4 days prior to relocation. Three bats were missed on the same day – 31 October 2017. One missed bat was on a gravel pad, 1 on a gravel road, 1 on restored grassland, and 4 on established grassland. Only one of the missed bats was partially occluded by vegetation. Two of the missed bats were near the edge of the maximum search radius.

Our dogs missed 8 birds ranging in size from a 3.7 g Bewick's wren to an 87.6 g Eurasian collared-dove. Three birds were missed on the same day – 13 November 2017, and 2 more were missed on the same day – 23 October 2017. Two of the missed birds were on the non-gravel portions of turbine pads, 3 were on reclaimed grassland, and 3 were in established grassland. Three were partially occluded by vegetation, and 4 were on very steep slopes. Two of the missed birds were at the edge of the maximum search radius.

Of the 15 missed bat and bird trial carcasses, 4 bats and 6 birds were missed on 8 search days when the dog team was either accompanied by Heath Smith (4 carcasses missed during 3 days) or photographed by Shawn Smallwood (6 carcasses missed during 5 days). That is, 67% of the misses occurred on 18% of the search days when the dog team might have been distracted. The misses occurred on days of distraction nearly 4× other than expected. Another bat trial carcass was missed during the first day the dog team searched. Twelve of the 15 trial carcass misses occurred among only 3 groups of turbines typically searched on a single day. Golden Hills turbines 4, 5 and 6, searched on the same day, included 5 missed trial carcasses. Buena Vista turbines C11 and C12, which were searched with C13 as a group, included 4 missed carcasses. Buena Vista turbines A14, A15, and A16, which were searched with A13 as a group, included 3 missed carcasses. Thus, 80% of missed trial carcasses occurred at 3 of 21 (14%) turbine search groups, or nearly 6× other than expected at these turbine groups. Common features of these turbine search groups were steep slopes and highest elevation peaks in the local area.

Searcher Detection and Distance from the Turbine

Searcher detection of trial carcasses was higher for dogs than for humans, more so for bat carcasses than bird carcasses (Figure 1 and below). Our dog searcher detection rates, *S*, did not change significantly with increasing distance from the turbine, whereas human searcher detection rates tended to decline with increasing distance (P<0.10):

Bat carcasses placed for dogs (Statistics unnecessary): $S = 1.000 - 0.0000X$
Bat carcasses placed for humans (r^2 = 0.16, SE = 0.08, P>0.05): $S = 0.174 - 0.0015X$
Bird carcasses placed for dogs (r^2 = 0.04, SE = 0.16, P>0.05): $S = 0.970 - 0.0020X$
Bird carcasses placed for humans (r^2 = 0.21, SE = 0.15, P>0.05): $S = 0.612 - 0.0031X$

Carcass Persistence

Within 10 days of placements, 75% of bats and 67% of small birds disappeared from placements sites (Figure 2). One month since placement, persistence rates were about 5% for bats and 11% for small birds (Figure 2). Broken down by body mass, smaller and larger bats persisted at nearly the same rates until two weeks elapsed, after which the smaller bats persisted longer

(Figure 3). Examined by carcass freshness at time of placement, the freshest carcasses might have persisted longer through about two weeks, after which persistence did not differ by freshness at placement time (Figure 3). Daily mean carcass persistence rates were similar between bats and small birds (Figure 4):

Bats $R_i = 1.01855 \times 0.89976^i$, $r^2 = 0.98$, RMSE = 0.11

Birds $R_i = 1 - 3.07322 \times \left(1 - exp\left(-0.09959 \times log(i+1)\right)\right)$, $r^2 = 0.99$, RMSE = 0.04

Daily mean search interval, *I*, at Buena Vista and Golden Hills was 22 and 27 days, respectively, so the fatality adjustment for carcass persistence would be 0.40 and 0.35 for bats and 0.39 and 0.35 for small birds. These adjustments translate to fatality estimates of 60 bats and 67 small birds at 31 wind turbines at Buena Vista, and 203 bats and 180 small birds at 32 wind turbines at Golden Hills during the time of our study (these estimates serve only as examples of fatality adjustments and are not intended for comparison to other wind projects).

Our carcass persistence rates generally compared well to those estimated at Vasco Winds (Brown et al. 2016) and previously at Golden Hills (H.T. Harvey and Associates 2017), although there were some notable differences (Table 3). Bat carcass persistence rates were very low at Vasco Winds in 2013, and the H.T. Harvey and Associates' (2017) estimates for both bats and small birds were higher than ours at 28 days.

Patterns of Found Fatalities around Wind Turbines

Here we begin with a human searcher basis for comparison. In the Vasco Winds monitoring effort of 2012-2015, human searchers revealed that fatalities/ha decreased rapidly with distance from the turbine (Figure 5, left graph), and in the same manner as reported by Huso et al. (2014, 2017). However, they also found that, examined another way, the number of small and large birds were represented in relatively constant numbers among increasing 10-m distance intervals from the tower base to the maximum search radius (Figure 5, right graph). The number of bats found by humans declined significantly with increasing distance from the turbine, but not as rapidly as when expressed in a density metric (Figure 5). The density plot exaggerates the concentration of carcasses near the turbine because the area is smaller; and not necessarily because there are more carcasses. The Huso et al. assumption of higher carcass density near the turbine can bias fatality estimates if searcher efficiency varies with distance from the turbine or if more fatalities actually deposit farther from the turbine.

The best-fit logistic model of cumulative fatality finds regressed on 10-m distance increments (Figure 6) was the following (Bats: $r^2 = 0.96$, RMSE = 90.76; Small birds: $r^2 = 0.99$, RMSE = 42.77; Large birds: $r^2 = 0.97$, RMSE = 75.27):

$$Y_{Bats} = \frac{1}{\frac{1}{45.39} + 0.29 \times (0.937^X)},$$

$$Y_{Small\ birds} = \frac{1}{\frac{1}{84.58} + 0.15 \times (0.957^X)},$$

$$Y_{Large\ birds} = \frac{1}{\frac{1}{60.43} + 0.12 \times (0.966^X)},$$

where *X* represented 10-m distance increments from the wind turbine's tower base. To come within 1 fatality of each asymptote, μ, maximum search radii would need to be 99, 159 and 173 m for bats, small birds, and large birds, respectively.

Over the time period for which we were provided data at Golden Hills, the human searcher results can provide for only weak examinations of spatial patterns of carcass deposition around wind turbines. Only a single bat was found, negating any spatial comparison, and only 21 birds. The single bat was found only 10 m from a turbine tower base, so the cumulative fatality count through 110 m was 1 for every 10-m increment. The best-fit logistic model of cumulative bird fatality finds regressed on 10-m distance increments (Figure 7) was the following (r^2 = 0.98, RMSE = 11.15):

$$Y_{Birds} = \frac{1}{\frac{1}{21.90} + 0.607 \times (0.953^X)}.$$

To come within 1 fatality of the asymptote, μ, the maximum search radius would need to be 119 m for birds, according to the findings of human searchers at Golden Hills. This maximum search radius was predicted to be shorter at Golden Hills than it was for both small and large birds at Vasco Winds.

Based on our dog searches at Golden Hills, the best-fit logistic model of cumulative fatality finds regressed on 10-m distance increments (Figure 7) was the following (Bats: r^2 = 0.98, RMSE = 109.14; Small birds: r^2 = 0.99, RMSE = 24.77; Large birds: r^2 = 0.98, RMSE = 6.02; All birds: r^2 = 0.99, RMSE = 29.71):

$$Y_{Bats} = \frac{1}{\frac{1}{78.86} + 0.16 \times (0.962^X)},$$

$$Y_{Small\ birds} = \frac{1}{\frac{1}{52.15} + 0.58 \times (0.954^X)},$$

$$Y_{large\ birds} = \frac{1}{\frac{1}{17.83} + 9.18 \times (0.942^X)},$$

$$Y_{Birds} = \frac{1}{\frac{1}{73.889} + 0.48 \times (0.956^X)},$$

Site	Taxa	Model coefficients			r^2	RMSE	Model-predicted asymptote of cumulative fatalities	
		a	b	c			Distance from turbine (m)	Proportion within max search radius
GH	Bats	78.86	0.16	0.962	0.98	109.14	177	0.86
GH	Small birds	52.15	0.58	0.954	0.99	24.77	156	0.86
GH	Large birds	17.93	9.18	0.942	0.98	6.02	120	0.79
GH	All birds	73.89	0.48	0.956	0.99	29.71	173	0.80
BV	Bats	25.96	1.22	0.915	0.99	5.16	76	0.96
BV	Small birds	21.63	3.36	0.936	1.00	0.61	110	0.74
BV	Large birds	7.91	18.74	0.917	0.98	1.12	80	0.89
BV	All birds	28.79	3.13	0.929	1.00	2.55	108	0.80

where *X* represented 10-m distance increments from the wind turbine's tower base. To come within 1 fatality of each asymptote, μ, maximum search radii would need to be 177, 156, 120 and 173 m for bats, small birds, large birds, and all birds, respectively.

Using dogs, the number of bats that were found increased with increasing distance from the turbine at both Buena Vista and Golden Hills (upper graphs, Figure 8), but these increases were proportional to the search areas within radial bands at increasingly greater distances from the turbine (lower graphs, Figure 8). At Buena Vista, the number of birds found by dogs spiked between 40 and 50 m from the turbines, whereas the number of birds/ha decreased greatly with distance from the turbine at both projects (Figure 8).

Impact of Turbine Shutdown on Volant Wildlife

Our expected values, $E[I_A]$, were 0.1958, 0.1220, 0.0061, and 0.1166 fatalities/search for bats, small birds, large birds, and all birds, respectively. Our observed fatalities/search at Buena Vista following the shutdown were 0, 0.0833, 0, and 0.0833 for bats, small birds, large birds, and all birds, respectively. The IMPACTs of the shutdown were 100% fatality reductions for bats and large birds, and a 32% reduction for small birds. The fatality finds examined in our BACI design would predict that 9.4 bats would have been found as fatalities at Buena Vista had the turbines continued operating. That 22 bats had been found at Buena Vista prior to the shutdown, and that 37 (58%) of 64 bats had been found at Golden Hills prior to the Buena Vista shutdown, indicates that the bat migration was winding down by the time the Buena Vista project was shut down. Nevertheless, the effect of the shutdown was substantial for bats. For large birds, the effect was ambiguous because the number of predicted large bird fatalities in the shutdown period was <1.

DISCUSSION

Despite the trial administrator's (Smallwood's) deliberate use of immature bats and birds, a preponderance of small-bodied species, and old carcasses along with the fresh ones, and despite the administrator's placement of some carcasses beyond the dog search radius, our dogs still found 100% of bat trial carcasses at Golden Hills and the vast majority of all other bird and bat carcass placements between the two wind projects. Adding to the findings of Mathews et al. (2013), our study further verifies the very large differences between human and dog searchers in

bat and small bird carcass detection rates. Compared to the 71 bat fatalities our dog team found at Golden Hills, human searchers found 1 bat among the same turbines searched and the same time period. Making this 71-fold difference even greater was the fact that the human searchers performed 69 turbine searches to our 55. Additionally, human searchers found 11 small birds whereas our dogs found 47 (4 were found by both teams), a greater than four-fold difference in small bird detection. A smaller, though substantial, difference in detection rates was associated with large birds, of which human searchers found 10 and our dogs found 16 (4 were found by both teams).

The bat carcass detection rate derived from human searches was 0.014 (1 human-found bat divided by 72 found by both human searchers and our dog team), whereas our rate derived from dog searches and detection trials was 1.000 (or 100%). For comparison, the human searches at Vasco Winds achieved a bat carcass detection rate of 0.052 for 134 bat trial carcasses that were integrated into routine fatality monitoring at turbines searched weekly (Brown et al. 2016). More precisely, among 82 bat trial carcasses known to be available to human searchers at Vasco Winds, the detection rate increased to 0.085. Among 42 bat trial carcasses placed in one-day trials at Vasco Winds, and therefore more comparable to the trials we performed at Golden Hills, the detection rate using humans was 0.143. Even the Vasco Winds rate based on a more comparable method was much lower than the rate we achieved at Golden Hills using dogs. Mathews et al. (2013) had found bat trial carcass detection rates of 0.73 using dogs and 0.20 using humans.

Consistent with Brown et al.'s (2016) conclusion that bat detection rates at Vasco Winds were too low for determining whether some wind turbines kill disproportionate numbers of bats, the basis for the same conclusion is even stronger at Golden Hills among the 32 turbines that were searched using humans without dogs. Human searchers cannot find enough of the available bats to test hypotheses related to spatial distributions of bat fatalities deposited around each wind turbine, let alone among wind turbines across a project. Only trained dogs and dog handlers can find enough of the available bats and small birds to test for patterns that can lead to more efficient fatality monitoring. Only dog searchers can inform whether activity patterns seen before construction can predict post-construction impacts. And only dogs can find enough of the available bats to develop micro-siting strategies and test operational curtailment strategies.

One of the implications of our study results is that fatality rates are being underestimated because too often investigators and permitting agencies have assumed that disproportionate numbers of fatalities fall straight down or near the wind turbine. This common assumption has justified maximum search radii that fall far short of the area needed to adequately detect available carcasses of birds and bats. Even at the recent wind projects in the APWRA, the search radius of 105 m appears to be too short. Rather than finding fewer bats with increasing distance from the turbine, as Huso et al. (2014, 2017) posited, we found the opposite. We found the number of bats to increase with distance from the turbine, consistent with Smallwood's (2016, and unpublished data) eyewitness observations of wind turbine casualties sometimes drifting far downwind of the turbine. Compounding this search radius bias, we also found that human searchers at Vasco Winds tended to find decreasing proportions of available bat and small bird carcass trials with increasing distance from the turbine. Not only did we learn that bat fatalities

are deposited in greater numbers farther from the wind turbine, but humans are able to find fewer of the available fatalities farther from the turbine.

Additional research is needed to determine just how far searches need to extend from turbines to potentially detect all of the available fatalities. Alternatively, additional research is needed to determine the proportion of fatalities that are not being detected due to insufficient search radius. Just as argued in Smallwood (2013), the fitting of logistic functions to cumulative numbers of fatalities with increasing distance is an interim measure to the more exact approach of searching farther. Fitting a model to fatalities collected within a maximum search radius will yield different patterns and different distances associated with asymptotic cumulative fatality finds depending on the search effort, including duration of monitoring and the maximum search radius used. What is needed is a research effort that uses dogs to continue searching outward from turbines until no more fatalities are found.

Other than the search radius bias, using trained dogs for fatality monitoring requires only one substantial adjustment to fatality estimates, and that would be for carcass persistence. Many of the placed bats and small birds are gone from placement sites within one week of placement. If carcass placement schedules are integrated into the fatality monitoring schedule (Smallwood 2017), then the average daily availability of carcasses will reduce the size of the adjustments from what might be implied in Figure 4. Such integrated detection trials would also provide for the small adjustments needed for dog searcher detection. Regardless, body mass would no longer be required for deriving fatality adjustments (Smallwood 2017).

Searching with dogs revealed a substantial error associated with carcass removals. Discounting two red-tailed hawks found by both the dog team and human searchers on the same search days, our dog team found 32% of the bird carcasses reported to have been removed by the human search team at Golden Hills. Similarly, our dog team revealed that our trial administrator (KSS), even knowing exactly where he placed carcasses, nevertheless falsely determined removals of 8.9% (11 of 123) of bird trial carcasses and 2.9% (3 of 105) of bat trial carcasses. This type of error is difficult to avoid because carcass remains often spread over large areas and some of the remains will be small and hidden in vegetation. Finding feathers and bones a month or two after the carcass was reported to have been removed can result in double-counting a fatality if it was falsely assumed to have been removed. Acknowledging the potential error associated with incomplete removals and false removal determinations, Brown et al. (2016) and Smallwood (2017) left carcasses where found and relied on fatality photos and on tracking when and where remains were found to prevent double counting.

We concur with Mathews et al. (2013) that fatality monitoring at wind turbines should be performed using trained dogs and dog handlers, and we further concur that dogs should be carefully selected for the task. Unlike humans, skilled dogs find almost all of the available carcasses. Some of our findings suggest that a skilled dog team might find even more of the available carcasses if the dog team is left undisturbed by colleagues. The much more accurate fatality estimates generated from dog searches can lead to more cost-effective monitoring and to insight about causal factors of collisions as well as reasonable solutions. Monitoring and mitigation solutions can be arrived at much more rapidly with the vastly superior data that trained dogs and their handlers can collect at wind turbine projects.

Finally, our test of whether operational curtailment can reduce bat fatalities was convincing, and compelling. We found that where wind turbines are shut down during a bat migration, bat fatalities cease. For bats to collide with wind turbines, the rotors of the turbines must spin. Because the migration season is relatively brief, a seasonal curtailment strategy would drastically reduce bat fatalities while not giving up a large proportion of the annual energy generation. However, operational curtailment appears to be less effective at reducing fatalities of small birds, consistent with the findings of Smallwood (2016a).

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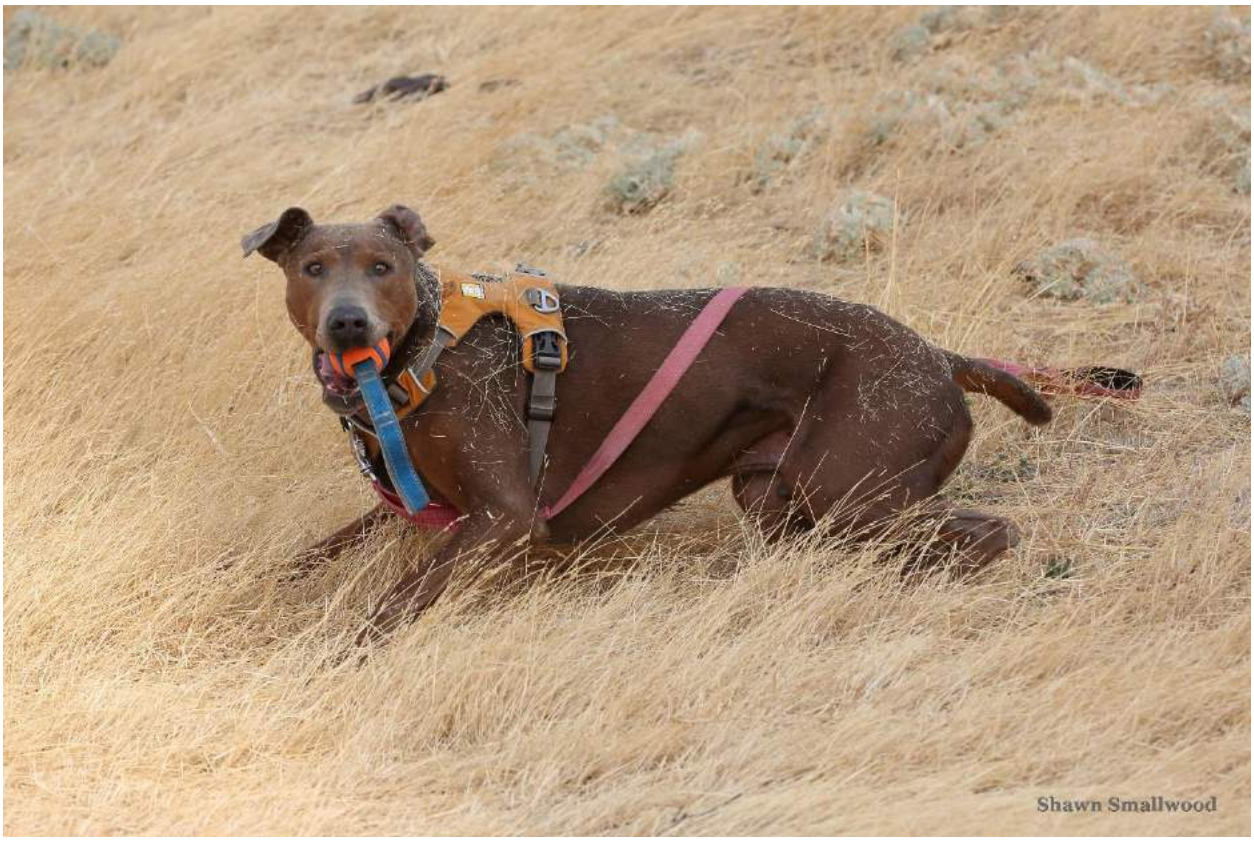

Captain celebrates after finding a fatality in the Altamont Pass, 2017

ATTACHMENT 2

Comparison of Wind Turbine Collision Hazard Model Performance Prepared for Repowering Projects in the Altamont Pass Wind Resources Area

K. Shawn Smallwood and Lee Neher

7 January 2017 (Updated 5 April 2018)

Photo by Shawn Smallwood

A repowered 2.3 MW Siemens wind turbine neighboring 1 MW Mitsubishi turbines in the background and 120 KW Bonus "old-generation" turbines in the foreground.

Update: This report was updated to include a revised burrowing owl collision hazard model, developed for a repowering project that is in progress. The new model relies on relationships between fatality rates at old-generation wind turbines and terrain. The new model performed much better than did any of the previous models. Everything else in this update is unchanged from the 7 January 2017 report. Because the first year report of fatality monitoring at Golden Hills became available in February 2018, an addendum to this report was prepared to address golden eagle model performance at Golden Hills.

Wind turbines were installed in the Altamont Pass Wind Resource Area (APWRA) in Alameda and Contra Costa Counties, California, beginning in the early 1980s. These original wind turbines, herein referred to as "old-generation wind turbines," ranged in rated capacity from 40 KW to 400 KW, some of which were installed on vertical axis towers and the rest were installed on horizontal axes mounted on towers ranging from 14 m to 43 m high. These old-generation wind turbines were usually arranged in rows, which were not sited with avian or bat collision risk in mind. By the mid to late 1980s the issue of raptor collisions emerged, and with subsequent monitoring efforts collision mortality was recognized as problems for raptors, other birds and even bats (Orloff and Flannery 1992, Smallwood and Thelander 2004, ICF International 2016). Orloff and Flannery (1992, 1996) and Smallwood and Thelander (2004, 2005) examined patterns of fatalities in efforts to identify candidate causal factors and to recommend mitigation solutions. Both studies recognized topography as important, as wind turbines located on particular terrain features were associated disproportionately with fatalities. Such terrain features included ridge saddles, breaks in slope, steep slopes, and valley features such as canyons and ravines. Given the deterioration of many old-generation wind turbines by the time the Smallwood and Thelander (2004) study was completed, Smallwood and Thelander recommended repowering of the wind projects as soon as possible.

Smallwood and Thelander's (2004) strongest recommendation was to begin repowering by replacing the old-generation wind turbines with modern turbines that are sited to minimize bird collisions. This recommendation was reiterated in Smallwood (2006), Smallwood and Neher (2005, 2009), Smallwood and Thelander (2005, 2008), Lamphier-Gregory et al. (2005), Smallwood and Karas (2009), and Smallwood et al. (2009a, c). The Alameda County Scientific Review Committee also recommended careful repowering as the highest priority measure for reducing raptor fatalities in the APWRA. Following the Smallwood and Thelander (2004, 2005) study, additional studies were performed and reports and papers written in support of developing collision hazard models to help guide repowering (Smallwood 2017a; Smallwood et al. 2009b,c; Smallwood et al. 2010, Smallwood et al. 2017). Some challenges and opportunities related to measuring the effects of repowering on birds and bats were summarized in Smallwood (2017b). Beginning in 2009 Smallwood and Neher began developing map-based collision hazard models, the first of which were prepared as demonstration studies focused on burrowing owl (Smallwood and Neher 2009, Smallwood et al. 2009a). Tres Vaqueros was the first repowering project for which we prepared map-based collision hazard models to reduce raptor fatalities (Smallwood and Neher 2010a, 2011). New models followed for the Vasco Winds repowering project (Smallwood and Neher 2010b), the Golden Hills project (Smallwood and Neher 2015a), the Patterson Pass project (Smallwood and Neher 2015b), Golden Hills North (Smallwood and Neher 2015c), Sand Hill (Smallwood and Neher 2016a), and Summit Winds (Smallwood and Neher 2016b).

Map-based collision hazard models of each successive repowering project benefitted from lessons learned from past efforts on repowering projects, but mostly from the Vasco Winds repowering project. For example, we learned from the Vasco Winds project that terrain needs to be weighted for collision hazard in anticipation of changes to terrain caused by grading for the new turbine pads and access roads. Another lesson learned was that most golden eagle fatalities are caused by wind turbines located on ridge structures that are generally oriented east-west. The models also benefitted from a transition from reliance on use rates to behavior rates and from the

accumulation of additional use and behavior data collected over longer time periods and larger areas in the APWRA. As the sample sizes of use and behavior data increased, additional predictor variables became available, such as rates of ridge crossings and wind turbine interaction events, i.e., near-misses. Newer collision hazard models also benefitted from the emergence of golden eagle telemetry data, and more expansive and more carefully interpreted fatality rates from both old and new wind turbines across the entire APWRA. The burrowing owl models benefitted from the expansion from the Vasco Caves Regional Preserve study of 2006-2007 used in the earliest models to the APWRA-wide burrowing owl density and distribution study begun in 2011 and used for later models. Furthermore, the latest model was prepared for the entire APWRA instead of tailored for individual project locations as had been done earlier. In summary, collision hazard models likely improved through time due to expanded and improved data used to inform the models, expanded and improved terrain measures used to develop the models, lessons learned from previous projects, and finally the shift from tailoring models for project sites to developing models APWRA-wide. However, these improvements were assumed rather than measured.

The primary objective of this study was to assess the predictive performance (defined explicitly in Methods section) of collision hazard models developed through the succession of repowering projects in the APWRA. Another objective was to assess whether the latest version of collision hazard models is the top-performer in terms of predicting collision risk based on spatial locations of wind turbines. A third objective was to assess whether and to what degree any of our collision hazard models developed for particular species might serve as umbrella predictors of collision hazard to all raptors as a group or to all birds as a group. A fourth objective was to further explore the data to determine why model predictions might have turned out to be lower than expected.

The most effective way to assess model performance is to monitor for fatalities at projects that were micro-sited according to model predictions. Vasco Winds was micro-sited according to one version of the collision hazard models, and because fatality monitoring was ongoing throughout the AWPRA while fatality monitoring was performed for three years following construction, we could assess the performance of the models by comparing project-level fatalities at Vasco Winds to fatalities elsewhere in a before-after, control-impact (BACI) experimental design (Brown et al. 2016). However, a BACI design is no longer feasible for comparing the performance of collision hazard models used to micro-site other repowering projects in the APWRA because APWRA-wide fatality monitoring was discontinued in fall 2014. The only comparisons possible going forward would be before-and-after repowering. Such comparisons are prone to confounding effects from unmeasured factors and would not be possible until post-construction fatality monitoring is completed at repowering projects. Fatality monitoring at Golden Hills began in fall 2016, so results there are becoming available one annual fatality monitoring report at a time. For the sake of minimizing collision risk as part of the micro-siting of new or ongoing repowering projects, we assessed post-construction fatality monitoring results at Golden Hills in an addendum report. In this report, we needed to assess progress of the collision hazard models based on fatality rates at old-generation wind turbines.

This study compared estimates of fatality rates among >4,100 APWRA wind turbines that were monitored for at least one year, 1998-2015, across four hazard classes that were predicted by

each version of the models we developed. Collision hazard classes ranged 1 through 4, representing lowest (1) to highest (4) collision risk. Among all 6 versions of the models, Hazard Class 1 typically covered about 63% of the APWRA landscape, Hazard Class 2 covered about 20%, Hazard Class 3 covered about 12%, and Hazard Class 4 covered about 5%. For each of the collision hazard models we identified which of the monitored wind turbines belonged to each of these Hazard Classes. We judged a model to perform well if the estimated mean fatality rate increased substantially from Class 1 to Class 4, or alternatively from Classes 1 and 2 to Classes 3 and 4. Another indicator of superior performance was whether mean fatality rates increased continuously from one Hazard Class to the next in succession. Another indicator included precision (confidence interval) of mean fatality rate estimates, but this indicator was complex and is discussed in more detail later. Our approach assumed that collision hazard is influenced more by spatial location than by wind turbine size or type. This assumption may not be entirely true, but there is little evidence available to either refute or verify it, and it is an assumption that also applied to all of the micro-siting implemented to date in the APWRA.

METHODS

Each version of the collision hazard models required detailed technical explanations resulting in relatively large reports. Because the primary objective of this study is simply to compare the performance of collision hazard models prepared for repowering projects in the APWRA, we report a methodological overview as well as methods that pertain directly to the objectives of this report. Detailed explanations of methods used to develop collision hazard models can be found in the original reports, cited earlier.

Comparing collision hazard models among repowering projects is complicated by variation in data sources (Table 1) and in wind project locations. Models were developed from those portions of the APWRA where data were collected. For example, the earliest models were based on data collected from Vasco Caves Regional Preserve, including the entirety of Vasco Caves for burrowing owl data and the surveyed airspace around 15 observation stations for volant raptor use data. Later models were based on data collected APWRA-wide, including from 46 sampling plots for burrowing owl data and the surveyed airspace around many observation stations for volant raptor use and behavior data. Later models were also based on fatality data collected from wind turbines monitored for at least one year, but the terrain represented by monitored turbines shifted through time as more turbines were included in monitoring. These models, which varied in data sources, were then extended to various project locations. The project locations varied in terrain conditions, with some projects on large hills and deep valleys and others on shallower terrain. We had tailored the models to fit the terrain of each project, leaving a comparison of model performance less than straightforward. For example, some models for specific focal species might apply to ranges of elevation that are missing from other project areas. Adding to the difficulty of comparing model performance is the fact that most of the projects involved have yet to be repowered and monitored for fatalities. Yet to be constructed are Tres Vaqueros, Patterson Pass, Golden Hills North, Sand Hill and Summit Winds. Golden Hills was constructed, but fatality monitoring began in fall 2016, and fatality rate estimates were unavailable until February 2018 (an addendum report has been prepared to address the golden eagle fatalities). The only constructed and monitored repowering project for which collision hazard models were prepared includes the Vasco Winds project.

For each focal species we typically built a collision hazard model combined from models that were built from specific types of data. For a particular species, we might have constructed a model based on behavior patterns, another based on GPS/GSM telemetry positions, and another based on fatality rates. Each of these data sources introduced unique sources of error and bias even though we attempted to reduce error and the effects of bias to the degrees feasible. For example, use rates are prone to error and bias in detection rates of flying birds due to variation in airspace that is visible from the observation station. We therefore adjusted use rates by calculating visible volumes of airspace surveyed at each station and dividing the number of birds detected per survey hour by the visible volume of airspace. In another example, fatality rates vary due to variation in searcher detection rates of carcasses, carcass persistence time, and proportion of carcasses found within the maximum fatality search radius, which also varied in the APWRA. Fatality rates also vary due to variation in the denominators in the fatality ratio metric, including wind turbine capacity in MW and the duration of monitoring in years. We therefore adjusted fatality rates for all these sources of variation. In yet another example, GPS/GSM telemetry positions of golden eagles are referenced to the Geoid, so we mounted telemetry units to Smallwood's truck while driving around the APWRA as a basis for adjusting eagle heights above ground relative to a digital elevation model of the APWRA. Telemetry positions were also processed to identify those within certain height domains above ground and those attributed to perching versus flying. All of these adjustments, and others, are detailed in the reports we prepared on collision hazard models. Adjustments specific to use rates are also detailed in Smallwood (2017a). Adjustments specific to fatality rates are also detailed in Smallwood (2007, 2013).

We integrated the data-specific models to derive composite models in the hope that the collision hazard models would be more robust. The latest iteration of the golden eagle model was a composite of a model developed from flight behaviors, a model developed from GPS/GSM telemetry, and a model developed from fatality rates at monitored wind turbines. The composite collision hazard models that could be compared for golden eagle, red-tailed hawk, American kestrel and burrowing owl include those in Table 1. For burrowing owl, we did not develop a composite model early on, but we developed one later as we acquired data on fatality rates as well as burrow locations.

To assess model performance among species and projects, we compared fatality rate estimates to collision hazard predictions made from the composite models. We did not compare the models developed for Patterson Pass because we were unable to secure permission from the owner of the project, EDF (emails and phone calls were not answered). However, the models developed for Patterson Pass were similar to those developed for Golden Hills North. For the latest version of collision hazard models – those prepared for Summit Winds, we also compared model performance prepared from specific data sources. For all of these comparisons we extended model predictions across the entirety of the APWRA while maintaining the original model structures including collision hazard scores bounding lowest to highest collision hazard classes 1 through 4. All of the models predicted only four collision hazard classes resulting in about 63% of the APWRA in the lowest collision hazard class of 1, about 20% of the APWRA in the second lowest collision hazard class of 2, about 12% of the APWRA in the second highest collision hazard class of 3, and about 5% of the APWRA in the highest collision hazard class of 4.

Table 1. *Summary of data sources used to develop collision hazard models for repowering projects in the Altamont Pass Wind Resources Area, California.*

Model version	Wind project	MW	Year	Data sources[1] linked to terrain measurements	
				Golden eagle, red-tailed hawk, American kestrel	**Burrowing owl**
1	Tres Vaqueros	28.800	2010	Use in Vasco Caves 2005-2007	Burrow locations in Vasco Caves 2005-2007
1	Vasco Winds	78.100	2010	Use in Vasco Caves 2005-2007	Burrow locations in Vasco Caves 2005-2007
2	Golden Hills	87.400	2015	Use from Vasco Caves 2005-2007, Buena Vista 2008-2009, and Alameda County monitor 2005-2011; Behavior in APWRA 2012-2014; Fatality rates in APRWRA 1998-2010 (golden eagles only)	No model was developed
3	Patterson Pass	21.960	2015	Behavior in APWRA 2012-2014; Fatality rates in APWRA 1998-2010 (golden eagles only)	No model was developed
4	Golden Hills North	39.250	2015	Behavior in APWRA 2012-2014; Fatality rates in APWRA 1998-2010 (except for American kestrels)	Burrow locations in 46 APWRA plots 2011-2012; Fatality rates in APWRA 1998-2010
5	Sand Hill	24.146	2016	GSM/GPS telemetry (golden eagles only) 2012-2015; Behavior in APWRA 2012-2015; Fatality rates in APWRA 1998-2010 (except for American kestrels)	Burrow locations in 46 APWRA plots 2011-2015; Fatality rates in APWRA 1998-2010
6	Summit Winds	54.000	2016	GSM/GPS telemetry (golden eagles only) 2012-2015; Behavior in APWRA 2012-2015; Fatality rates in APWRA 1998-2015	Burrow locations in 46 APWRA plots 2011-2015; Fatality rates in APWRA 1998-2015

[1] For consistency and comparability, all fatality rates were adjusted consistency by Smallwood , regardless of the source.

Diagnostics indicating superior model performance include (1) increasing mean fatality rates with each higher collision hazard class from 1 through 4, (2) large magnitude increases in mean fatality rates at hazard classes 3 and 4 compared to classes 1 and 2, and (3) smaller 90% confidence intervals (CI). The third diagnostic is less reliable, however, because the majority of monitored wind turbines will not have caused a fatality during the period of monitoring, especially among wind turbines monitored over relatively short periods (monitoring duration varied greatly among APWRA turbines, ranging 1 to 10 years). Fatality rates at wind turbines where fatalities were found will have been adjusted for the portion of fatalities not found among the turbines monitored, meaning the found fatalities are adjusted for the failure to find fatalities that actually happened at other wind turbines. Adjustments for searcher detection error and carcass persistence can result in one burrowing owl fatality found at a turbine being adjusted to more burrowing owl fatalities attributed to that turbine, ranging 7 to 17 burrowing owl fatalities depending on the fatality search interval used in monitoring. Building from this example, what this means is that up to 16 burrowing owl fatalities that occurred at up to 16 other wind turbines were attributed to the single turbine where the one fatality was found while the other turbines were attributed with false zero fatality finds. This loading of unfound burrowing owl fatalities onto the one turbine where a fatality was found artificially inflates the confidence ranges. Therefore, diagnostics (1) and (2) are most reliable, and were weighted accordingly:

Sequential increase of mean fatalities/year in hazard class (S) High score = 3

Y = Mean fatalities/year in hazard class as multiple of mean in lower hazard class

$Y \leq 0.9$	-1
$0.9 < Y < 1.1$	0
$Y \geq 1.1$	1

Magnitude of increase between Classes (M) High score = 8

Y = Mean fatalities/year in hazard class 3 or 4 as multiple of mean in class 1

$Y \leq 0.9$	-1
$0.9 < Y < 1.1$	0
$1.1 \leq Y < 2$	1
$2 \leq Y < 3$	2
$3 \leq Y < 4$	3
$Y \geq 4$	4

Precision of mean fatalities/year in hazard class (P) High score = 8

Y = 90% CI (1.645 × SE) in hazard class as multiple of overall mean fatalities/year

$Y \leq 1$	2
$1 < Y \leq 2$	1
$2 < Y \leq 3$	0
$3 < Y \leq 4$	-1
$Y > 4$	-2

$$Model\ performance = \frac{\left(\left(\frac{S}{3} \times 2\right) + \left(\frac{M}{8} \times 2\right) + \left(\frac{P}{8}\right)\right)}{5}$$

We also plotted mean fatality rate estimates by collision hazard class for all raptors as a group and all birds as a group, and where the collision hazard classes were originally predicted for golden eagle, red-tailed hawk, American kestrel, or burrowing owl. The only models used were combined models for each species. One purpose of this comparison was to determine whether and to what degree species-specific collision hazard models could serve as umbrella models for raptors or all birds. Another was to determine whether any versions of the models can serve as superior umbrellas for predicting raptor or all bird collision hazard.

Each version of the combined collision hazard models were mapped over the same area to illustrate spatial differences. The area selected roughly covered the project area proposed for Golden Hills North. However, we intentionally omitted proposed wind turbine locations related to Golden Hills North because at the outset of this study we agreed not to map proposed turbine locations due to ongoing micro-siting.

RESULTS

The most recent collision hazard models developed for Summit Winds performed best among all monitored wind turbines across the APWRA (Table 2, Figures 1-4). Our indicator of model performance was highest in model version 6 for golden eagle, red-tailed hawk and American kestrel, and in version 7 for burrowing owl (Table 2). Hazard class 4 was highest among all the golden eagle models, but the overall response (magnitude of increase in fatality rates) was best in model version 6 prepared for Summit Winds (Figure 1). Hazard class 4 was also highest among all the red-tailed hawk models, but the overall response was best in model version 6 prepared for Summit Winds (Figure 2). Compared to estimated golden eagle fatality rates at wind turbines in hazard class 1 of model version 6, the estimated fatality rates in hazard class 3 averaged 2.6× higher and the estimated fatality rates in hazard class 4 averaged 3.67× higher. Whereas golden eagle fatality rates in model version 2 increased continuously from one hazard class to the next in succession, compared to estimated golden eagle fatality rates at wind turbines in hazard class 1 of model version 2, the estimated fatality rates in hazard class 3 averaged only 1.9 × higher and the estimated fatality rates in hazard class 4 averaged only 2.3× higher.

For red-tailed hawk, compared to estimated fatality rates at wind turbines in hazard class 1 of model version 6, the estimated fatality rates in hazard class 3 averaged only 1.4 × higher and the estimated fatality rates in hazard class 4 averaged only 1.5× higher (Figure 2). Whereas the magnitude of the fatality rate change between hazard classes 1 and 4 was similar between model version 6 and versions 1 and 2, mean fatality rates did not change much if at all between hazard classes 1 and 3 for any of the models except version 6. Overall, model version 6 performed better at predicting golden eagle fatality rates than red-tailed hawk fatality rates (Table 2).

Until model version 6, the collision hazard models performed miserably for American kestrel (Table 2, Figure 3). Our breakthrough performance with version 6 of the American kestrel model was due to our increased focus on terrain lower on the slopes and farther from ridge crests, which includes wind turbine locations where about 75% of American kestrel fatalities have been found. Model version 6 was the only version for which American kestrel fatality rates increased with successively higher collision hazard class. Compared to estimated American kestrel fatality rates at wind turbines in hazard class 1 of model version 6, the estimated fatality

rates in hazard class 3 averaged 1.75× higher and the estimated fatality rates in hazard class 4 averaged 3.16× higher.

Burrowing owl collision hazard models trended in the right direction, but version 7 performed best (Figure 4). Compared to estimated burrowing owl fatality rates at wind turbines in hazard class 1 of model version 1, the estimated fatality rates in hazard class 3 averaged 3.5× higher and the estimated fatality rates in hazard class 4 averaged 6.9× higher. Compared to estimated burrowing owl fatality rates at wind turbines in hazard class 1 of model version 6, the estimated fatality rates in hazard class 3 averaged 2.5× higher and the estimated fatality rates in hazard class 4 averaged 2.3× higher. Compared to estimated burrowing owl fatality rates at wind turbines in hazard class 1 of model version 7, the estimated fatality rates in hazard class 3 averaged 2.2× higher and the estimated fatality rates in hazard class 4 averaged 7.5× higher.

Table 2. *Performance (see indicators of performance, Methods section) of combined collision hazard models developed for each species and each repowering project in the Altamont Pass Wind Resource Area*.

Model version	**Wind project**	**Model performance**			
		Golden eagle	**Red-tailed hawk**	**American kestrel**	**Burrowing owl**
1	Vasco Winds	0.233	0.392	0.208	0.775
2	Golden Hills	0.575	0.308	-0.025	---
4	Golden Hills North	0.442	0.467	-0.333	0.333
5	Sand Hill	0.342	0.467	-0.050	0.333
6	Summit Winds	0.725	0.492	0.567	0.333
7	In progress	0.725	0.492	0.567	0.900

Version 6 of the golden eagle collision hazard models appeared to perform best when combined from all data sources, but also performed well when based on any of the three data sources (Figure 5). Version 6 of the red-tailed hawk collision hazard models appeared to perform best when based on the fatality data (Figure 6). Version 6 of the American kestrel collision hazard models also appeared to perform best when based on the fatality data (Figure 7). Version 7 of the burrowing owl collision hazard models appeared to perform best when based on fatality data conditioned on terrain attributes 3 (Figure 8).

The collision hazard models are depicted in map-form for each species and each model version in Figures 9 through 26, including a model for golden eagle collision risk based solely on GPS/GSM telemetry positions as a data source. These models were all extended to an area overlapping the Golden Hills North project. As a reminder, some of the hazard classes in some maps will appear out of balance from the distribution of hazard classes where the models were tailored for specific projects, because the landscape of Golden Hills North differs from the landscapes where models were originally developed, except for model versions 4 (the Golden Hills North model) and 6 (developed APWRA-wide).

Using the latest collision hazard models developed, version 6, we tested how well each species-specific combined model could serve as an umbrella model for all raptors as a group and all birds as a group (Figure 27). The collision hazard model developed for burrowing owl was the only

model that performed well at predicting the collision hazard of all raptors as a group and all birds as a group. Compared to estimated all-raptor fatality rates at wind turbines in hazard class 1 of burrowing owl model version 6, the estimated all-raptor fatality rates in hazard class 3 averaged 1.36× higher and the estimated all-raptor fatality rates in hazard class 4 averaged 1.75× higher. Compared to estimated all-bird fatality rates at wind turbines in hazard class 1 of burrowing owl model version 6, the estimated all-bird fatality rates in hazard class 3 averaged 1.4× higher and the estimated all-bird fatality rates in hazard class 4 averaged 1.78× higher. The golden eagle collision hazard model predicted increasing hazard classes with decreasing fatality rates of all birds (top right graph of Figure 27). This relationship demonstrates the trade-off of prioritizing wind turbine siting to maximize golden eagle protection; optimizing siting for eagles increases the likelihood of killing more birds of other species.

CONCLUSIONS

Our collision hazard models improved throughout the repowering process from the first version of the models to the last, and model version 6 was superior to other collision hazard models at predicting fatality rates at previously monitored wind turbines. For version 6 of the burrowing owl model, however, some wind turbines with high fatality rates were located outside areas predicted as hazard class 4. These misclassifications associated with a few specific types of terrain that could be readily accommodated with a change or two to the conditional statement linking terrain with high fatality rates to terrain with burrowing owl burrows. With this small change collision hazard model version 6 would also serve as the superior model for burrowing owls.

The latest version of the collision hazard models performed best for golden eagle, red-tailed hawk and American kestrel. The American kestrel model improved a great deal between versions 5 and 6 due to a shift in emphasis from ridge crests to lower on the slopes. In fact, model version 6 is the only version that accurately predicts collision hazard of American kestrel. The golden eagle model also improved a great deal between versions 5 and 6, probably for the same reason that the American kestrel model improved and also because the fatality rate data were improved and we added a new explanatory terrain measurement expressing ridge features located lower than nearby larger ridge features.

Whereas we are pleased with the improved model performance for 3 of the 4 focal species, we are confident that model performance can be improved further. The models of the other species can be improved by adding the latest telemetry and behavior data and by quantifying one or more terrain features that we hypothesize would relate to collision hazard. These additional terrain features would include ridge slope (slope of ridgeline from ridge crest to valley bottom), and polygons representing breaks in slope (locations along a ridgeline where slope suddenly changes). More could also be done with ridge orientation by specifying whether the ridge structure is declining and to which direction it is declining.

Our assessment of species-specific models for use as umbrella models for predicting collision hazards of all raptors and all birds highlights the tradeoffs often made when micro-siting turbines to minimize collision risk for one species. Prioritizing fatality minimization of golden eagles can result in micro-sited turbines putting many other species of bird at greater collision risk. The

burrowing owl model was the only model showing utility as an umbrella predictor of all bird and all raptor fatalities, so prioritizing both the golden eagle and burrowing owl collision hazard models would cover both eagles and most other species of birds.

ACKNOWLEDGEMENTS

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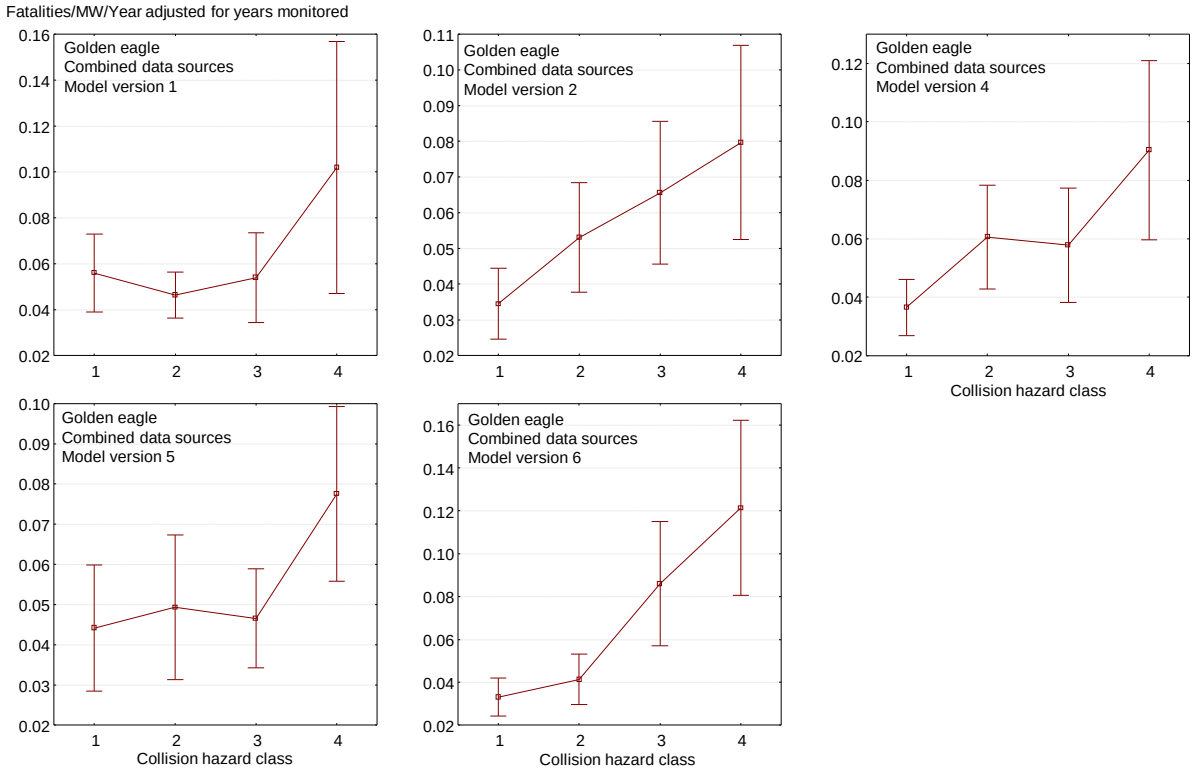


Figure 1. Responses of mean (90% CI) fatalities/MW/year to collision hazard class for golden eagle by collision hazard model versions 1 (Tres Vaqueros project), 2 (Golden Hills project), 4 (Golden Hills North project, 5 (Sand Hill project), and 6 (Summit Winds project).

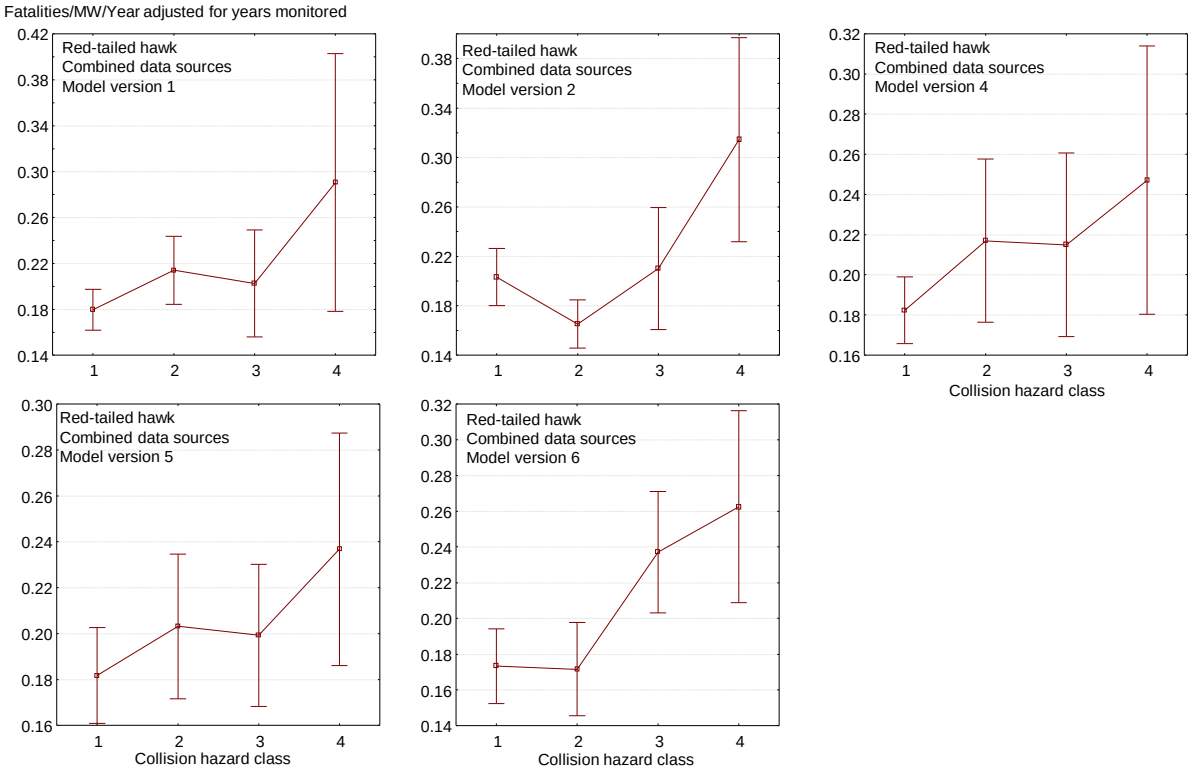


Figure 2. Responses of mean (90% CI) fatalities/MW/year to collision hazard class for red-tailed hawk by collision hazard model versions 1 (Tres Vaqueros project), 2 (Golden Hills project), 4 (Golden Hills North project, 5 (Sand Hill project), and 6 (Summit Winds project).

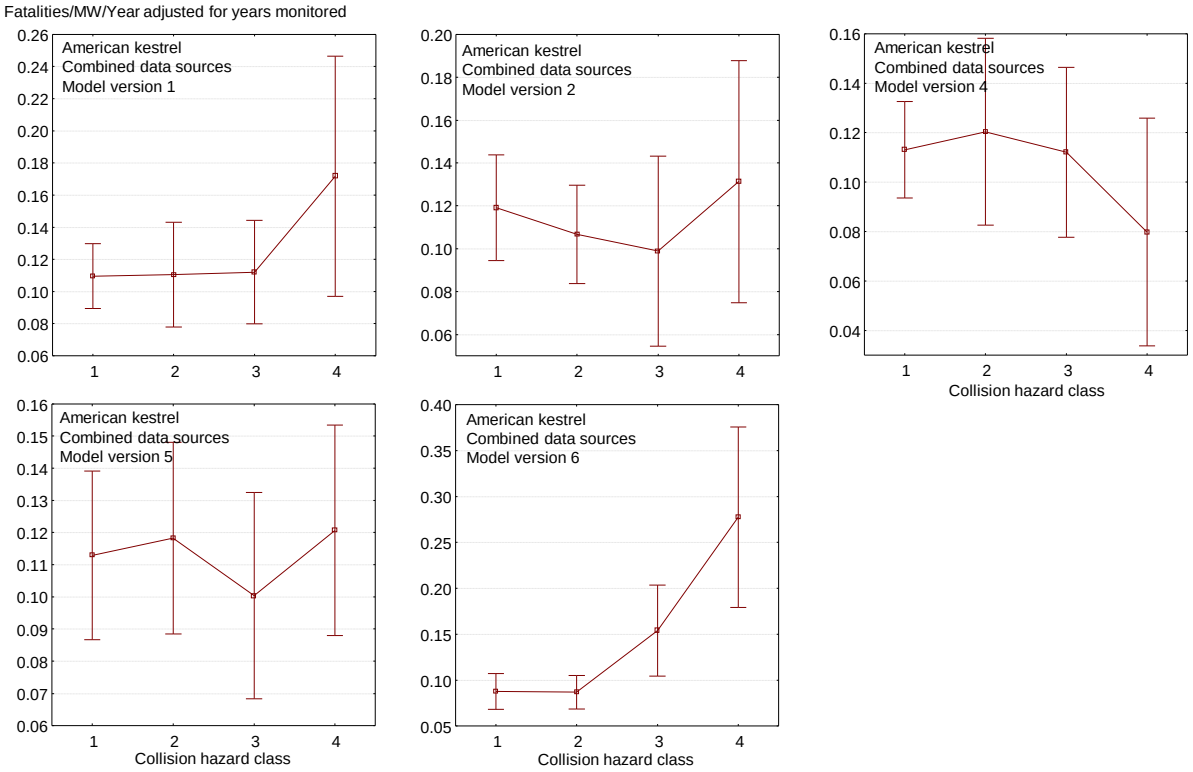


Figure 3. Responses of mean (90% CI) fatalities/MW/year to collision hazard class for American kestrel by collision hazard model versions 1 (Tres Vaqueros project), 2 (Golden Hills project), 4 (Golden Hills North project, 5 (Sand Hill project), and 6 (Summit Winds project).

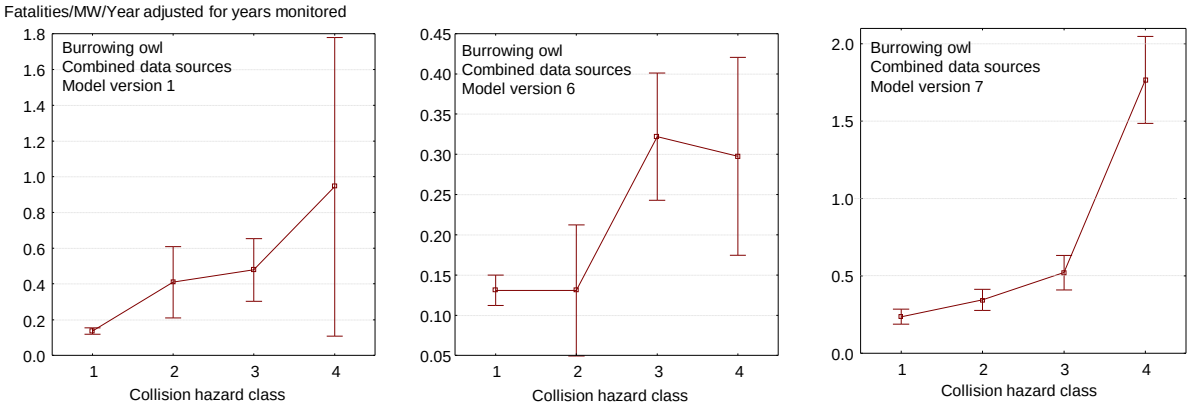


Figure 4. Responses of mean (90% CI) fatalities/MW/year to collision hazard class for burrowing owl by collision hazard model versions 1 (Tres Vaqueros project), 6 (Summit Winds project), and 7 (unnamed project in progress).

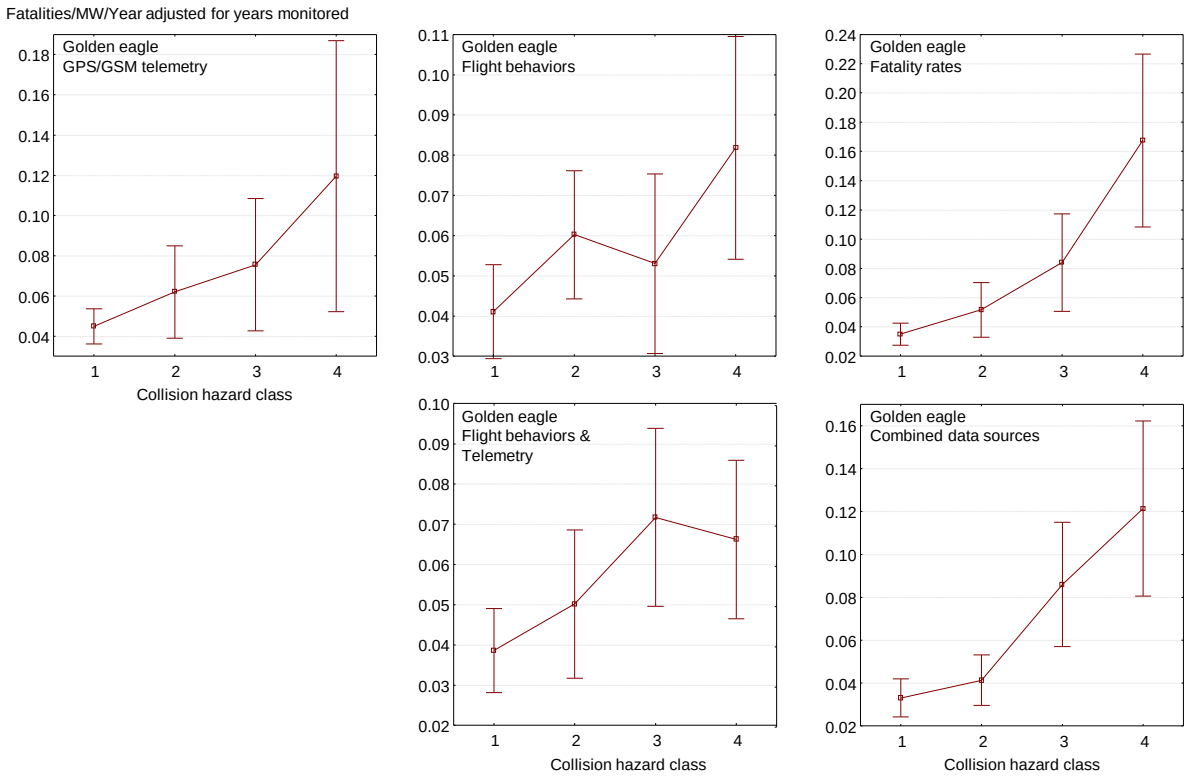


Figure 5. Responses of mean (90% CI) fatalities/MW/year to collision hazard class predicted by version 6 of the models developed for golden eagles based on GPS/GSM telemetry positions (top left), flight behaviors (top middle), fatality rates (top right), combined flight behaviors and telemetry positions (bottom left) and combined all data sources (bottom right).

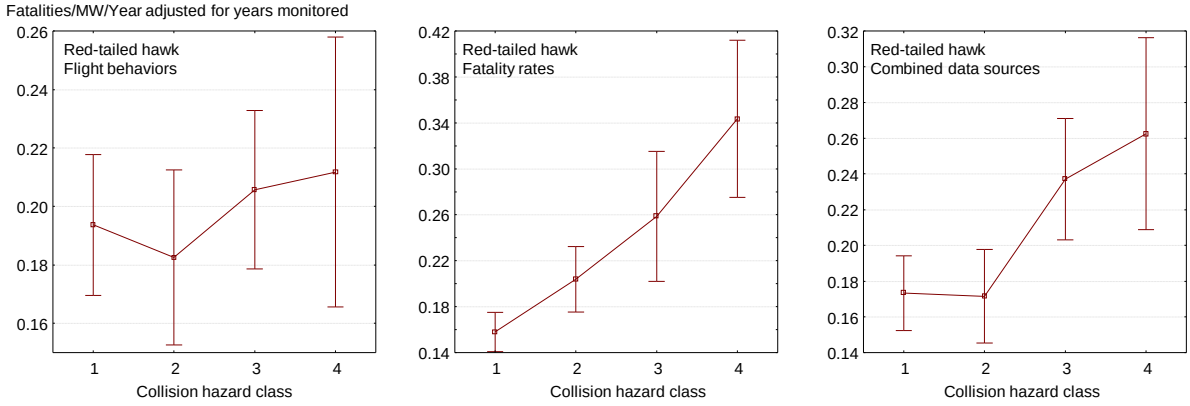


Figure 6. Responses of mean (90% CI) fatalities/MW/year to collision hazard class predicted by version 6 of the models developed for red-tailed hawks based on flight behaviors (left), fatality rates (middle), and combined flight behaviors and fatality rates (right).

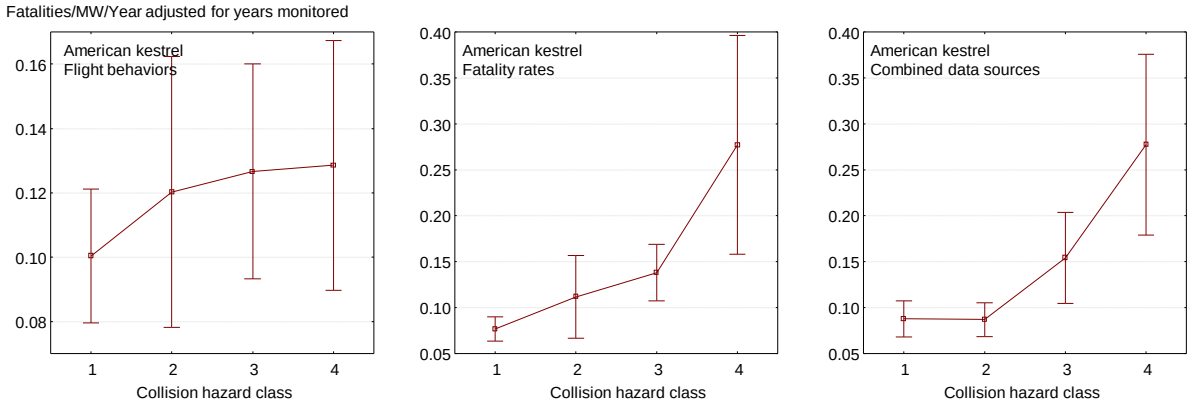


Figure 7. Responses of mean (90% CI) fatalities/MW/year to collision hazard class predicted by version 6 of the models developed for American kestrels based on flight behaviors (left), fatality rates (middle), and combined flight behaviors and fatality rates (right).

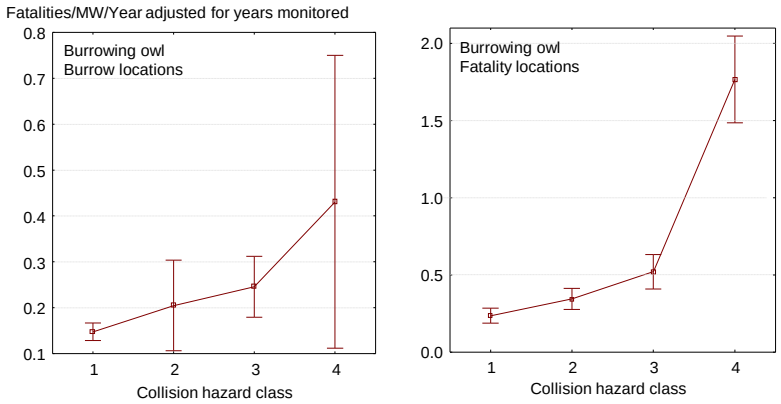


Figure 8. Responses of mean (90% CI) fatalities/MW/year to collision hazard class predicted by versions 6 and 7 of the models developed for burrowing owls based on burrow locations (left, version 6) and fatality rates (right, version 7).

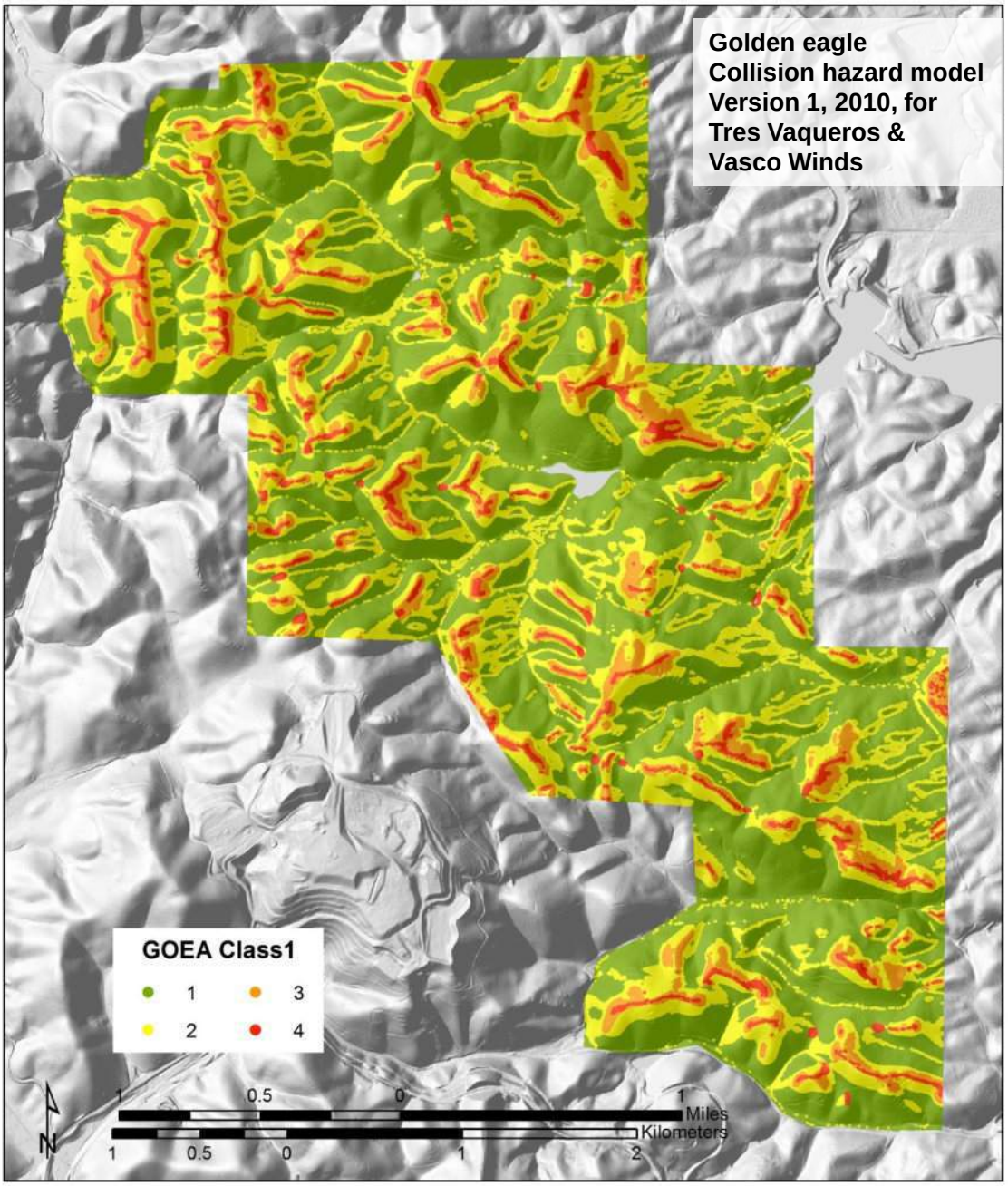


Figure 9. Version 1 of the golden eagle collision hazard classes composed of models developed from use data and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

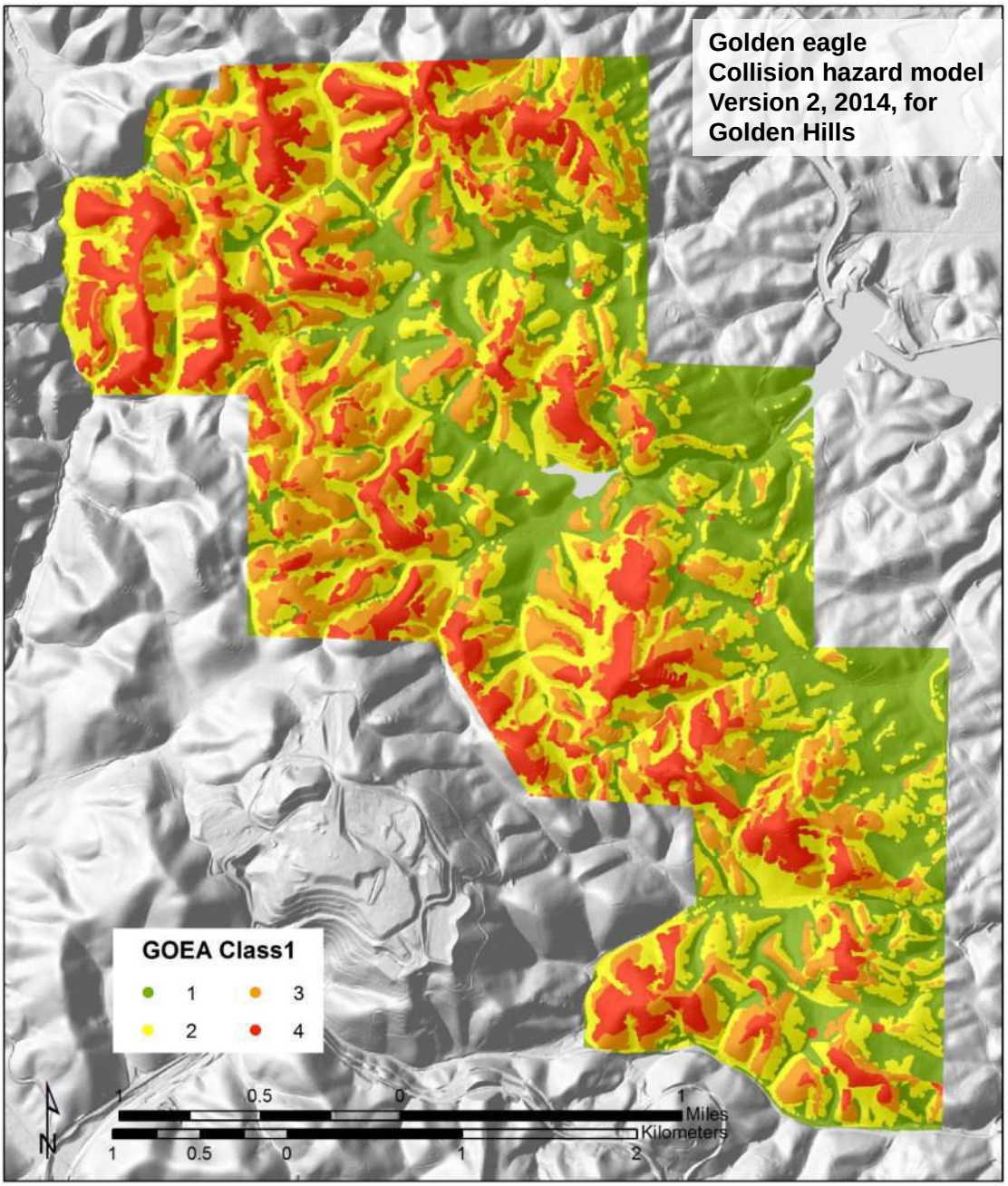


Figure 10. Version 2 of the golden eagle collision hazard classes composed of models developed from behavior data and fatality rates and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

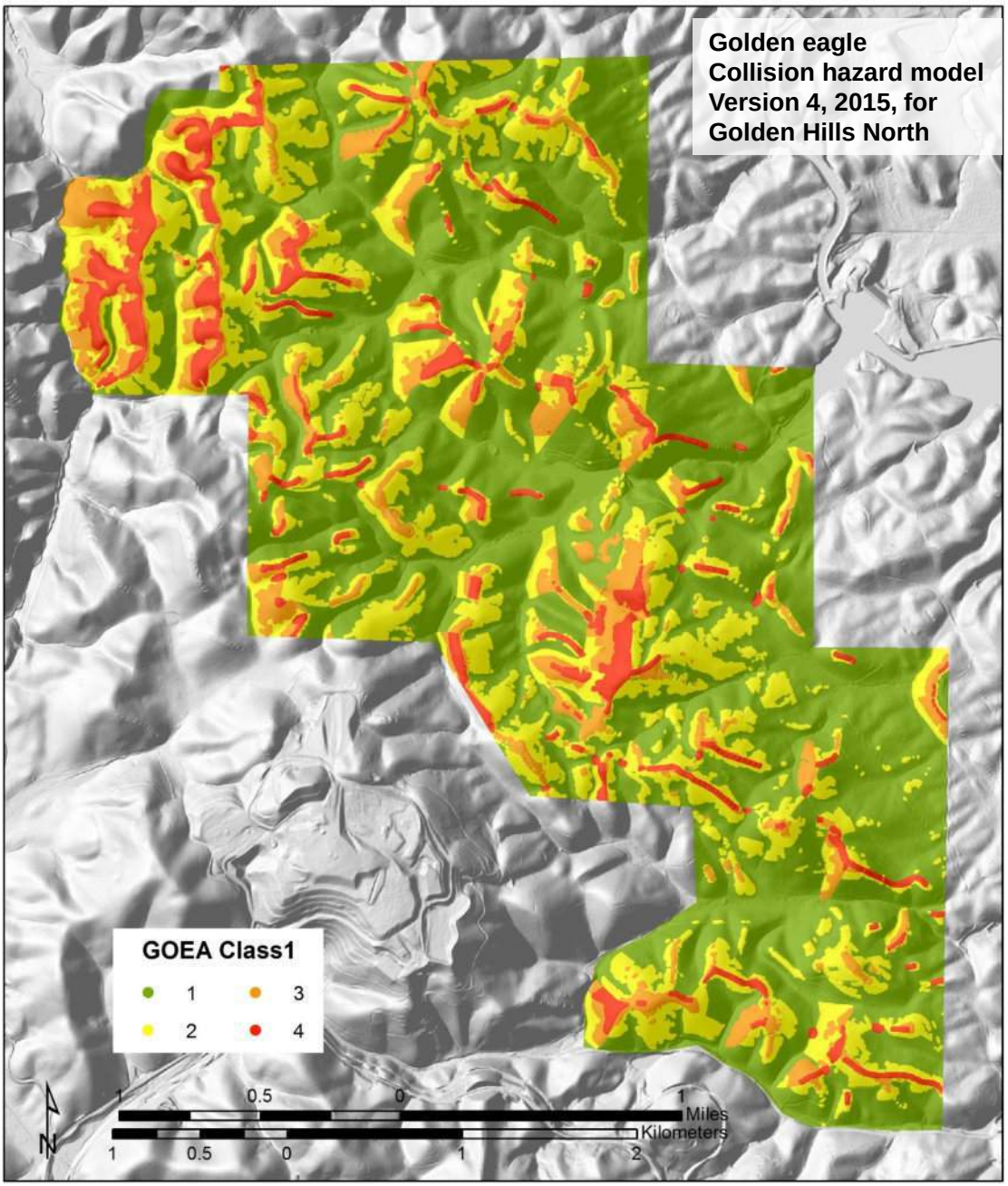


Figure 11. Version 4 of the golden eagle collision hazard classes composed of models developed from behavior data and fatality rates and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

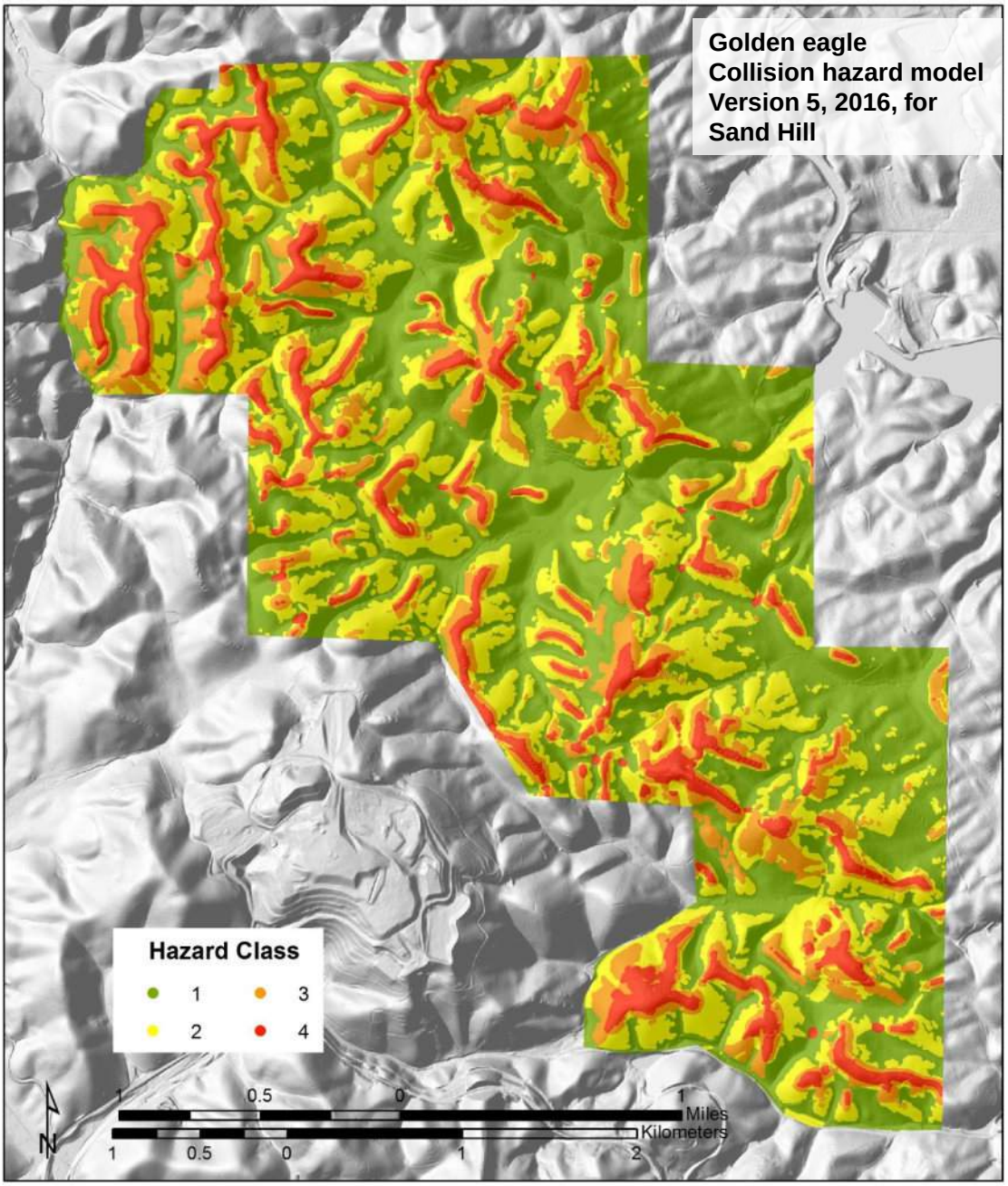


Figure 12. Version 5 of the golden eagle collision hazard classes composed of models developed from GPS/GSM telemetry positions, behavior data, and fatality rates and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

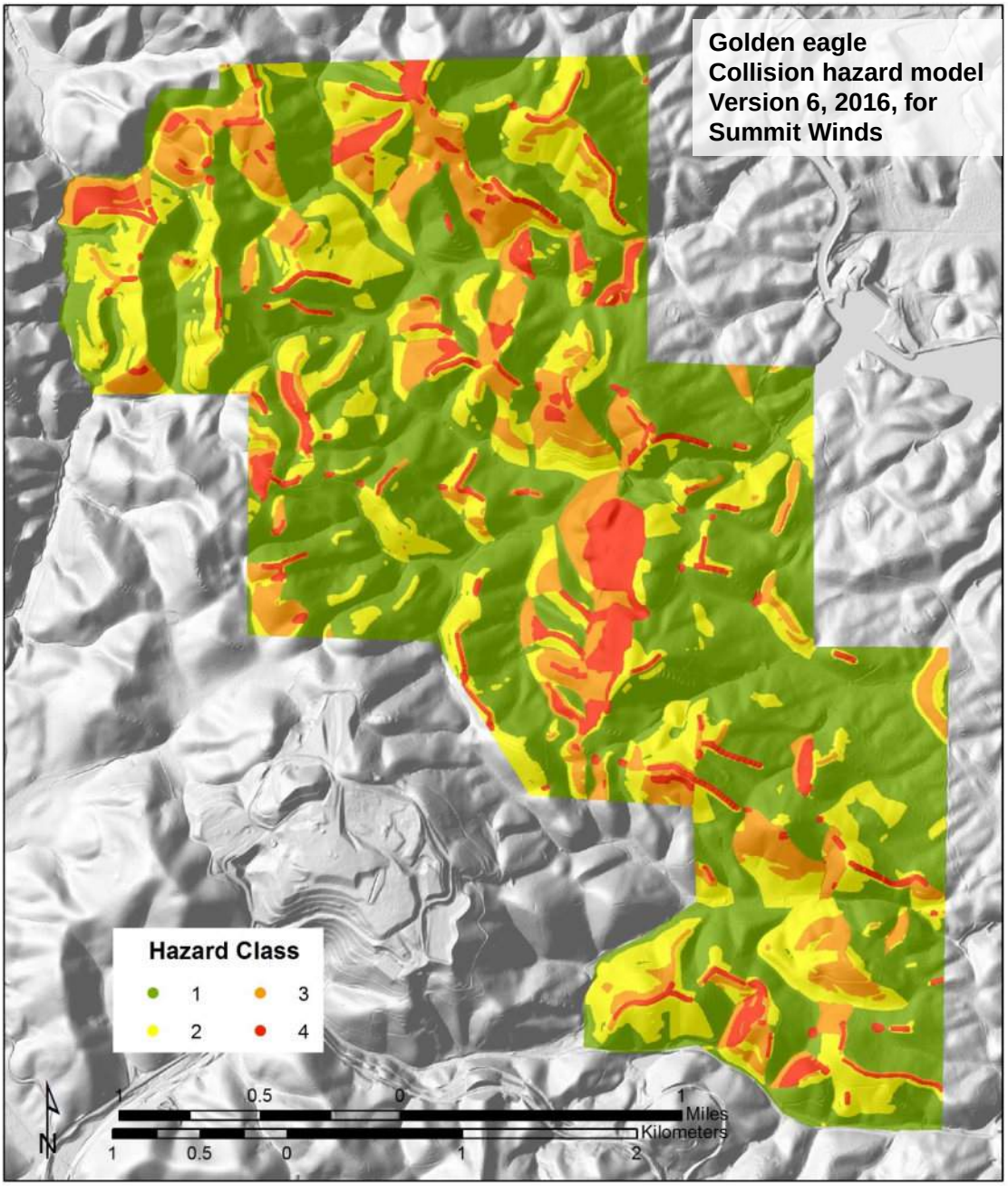


Figure 13. Version 6 of the golden eagle collision hazard classes composed of models developed from GPS/GSM telemetry positions, behavior data, and fatality rates and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

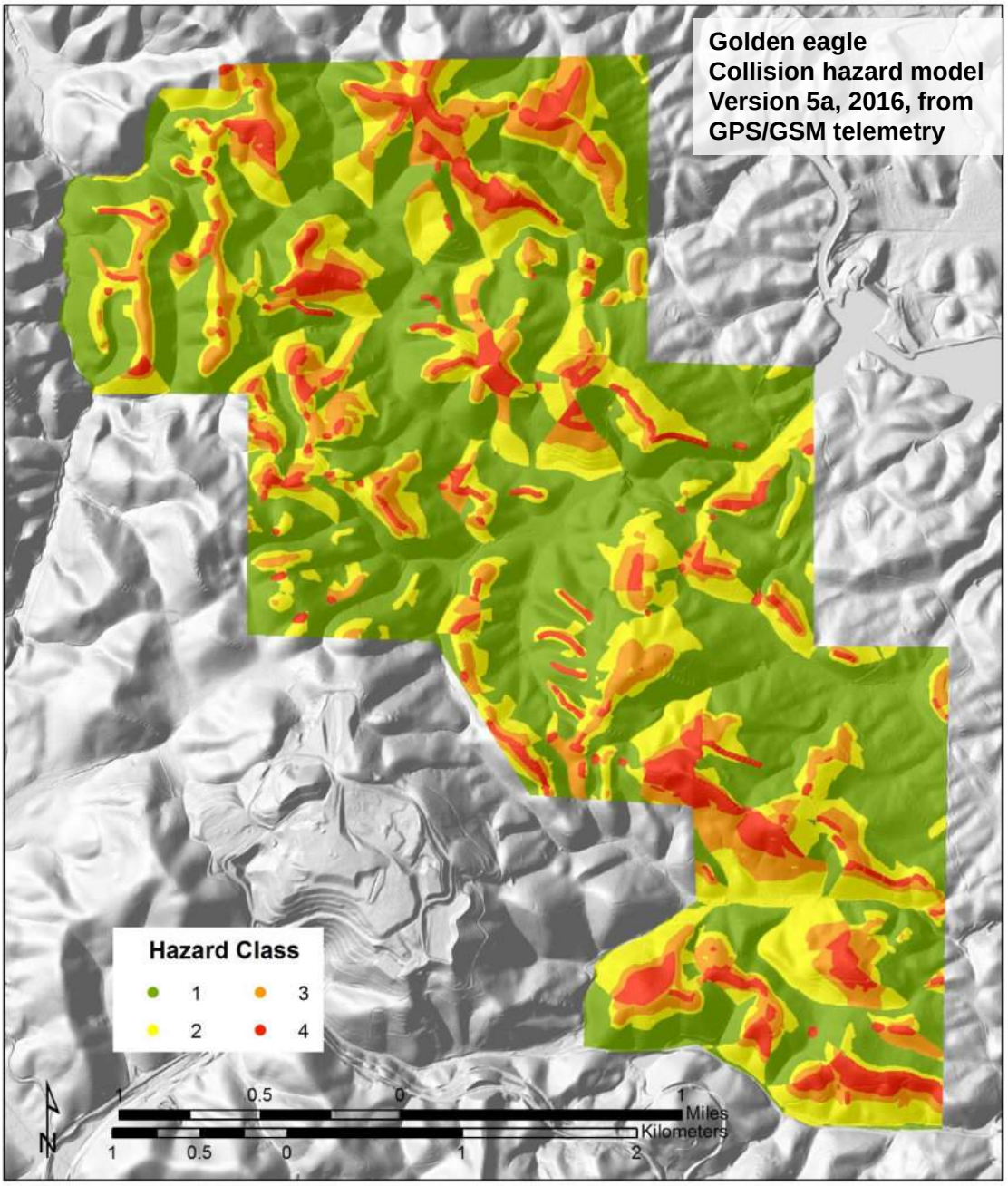


Figure 14. Only that portion of versions 5 and 6 of the golden eagle collision hazard classes composed of a model developed from GPS/GSM telemetry positions and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

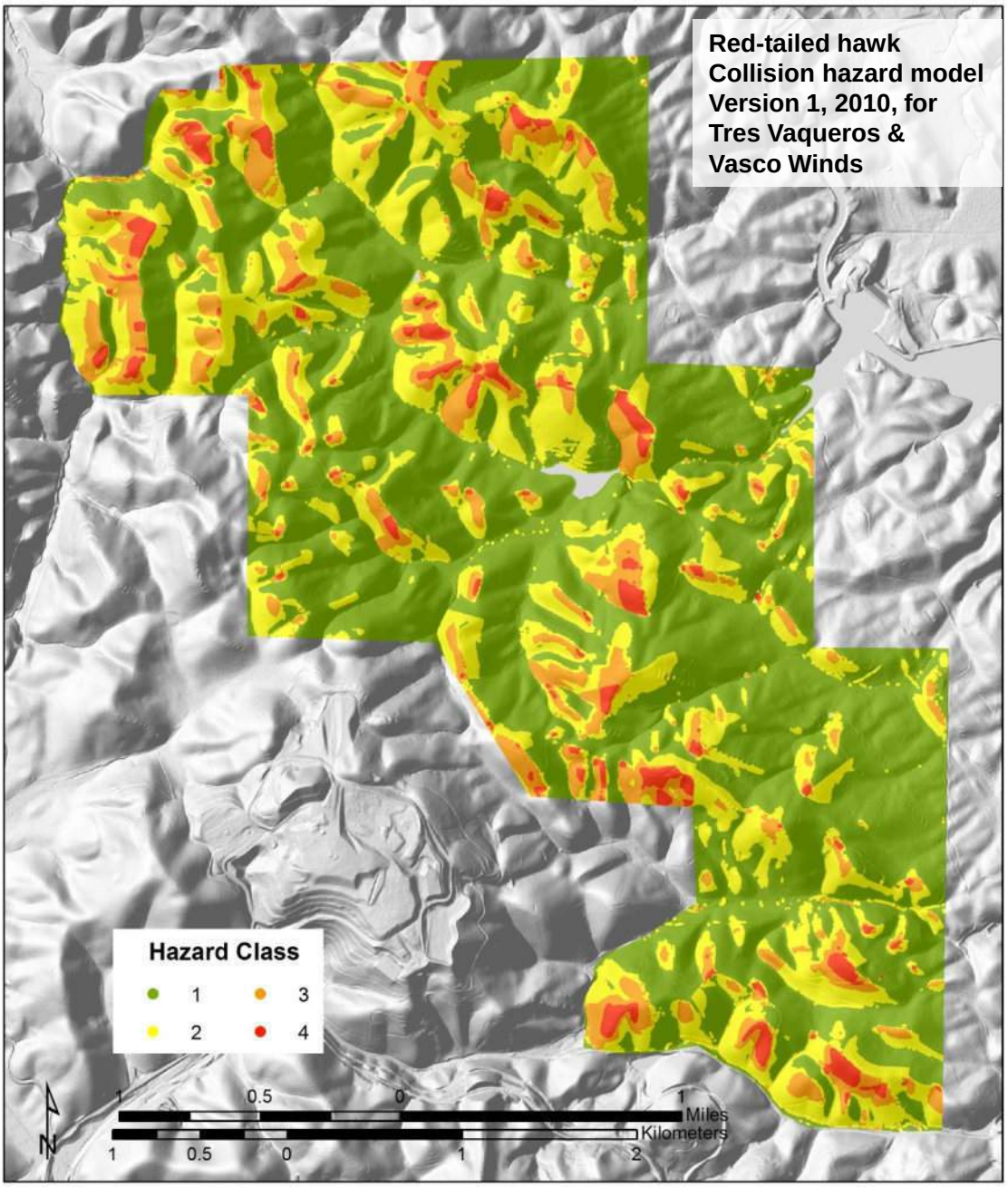


Figure 15. Version 1 of the re-tailed hawk collision hazard classes composed of models developed from behavior data and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

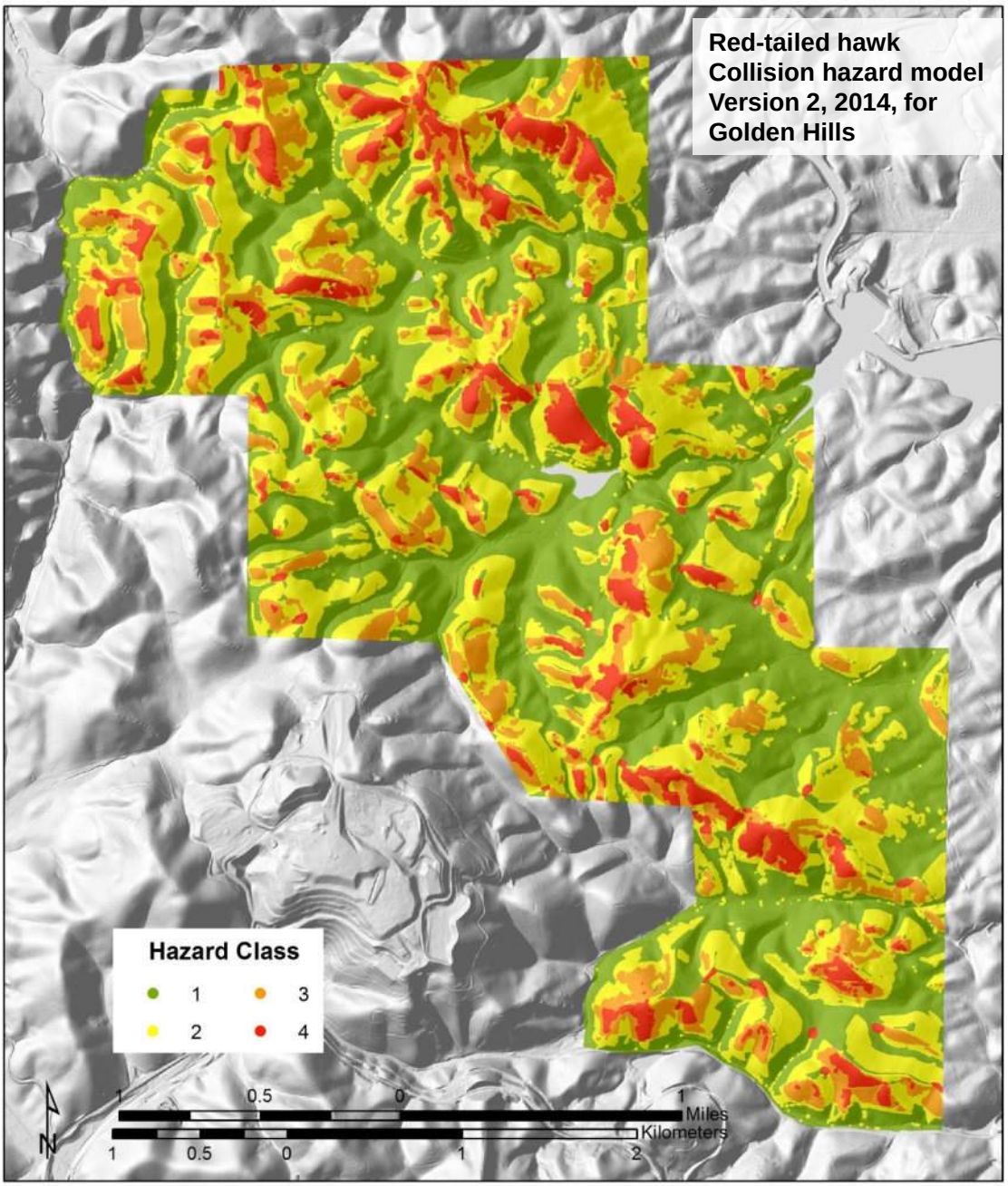


Figure 16. Version 2 of the re-tailed hawk collision hazard classes composed of models developed from behavior data and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

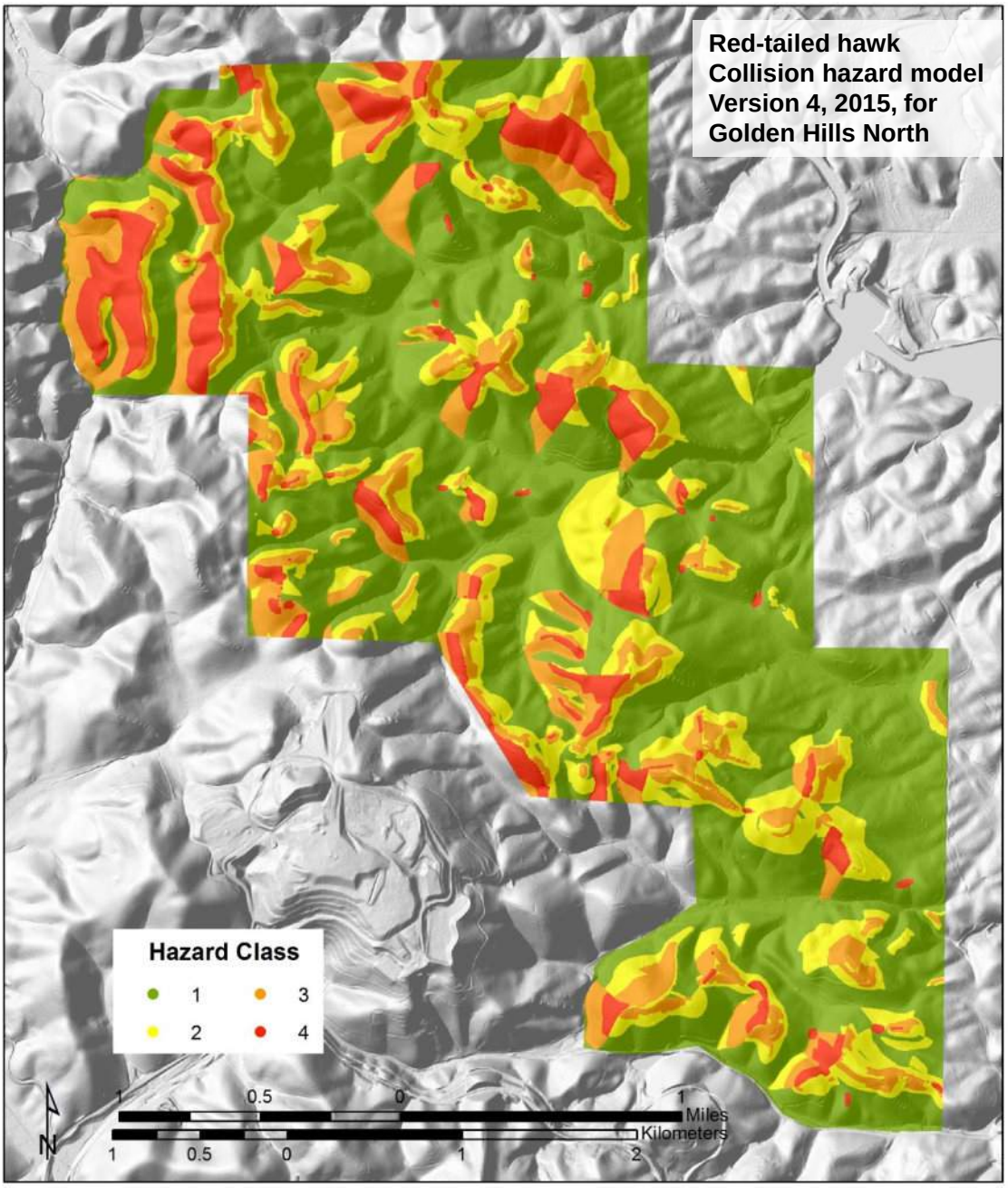


Figure 17. Version 4 of the re-tailed hawk collision hazard classes composed of models developed from behavior data and fatality rates and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

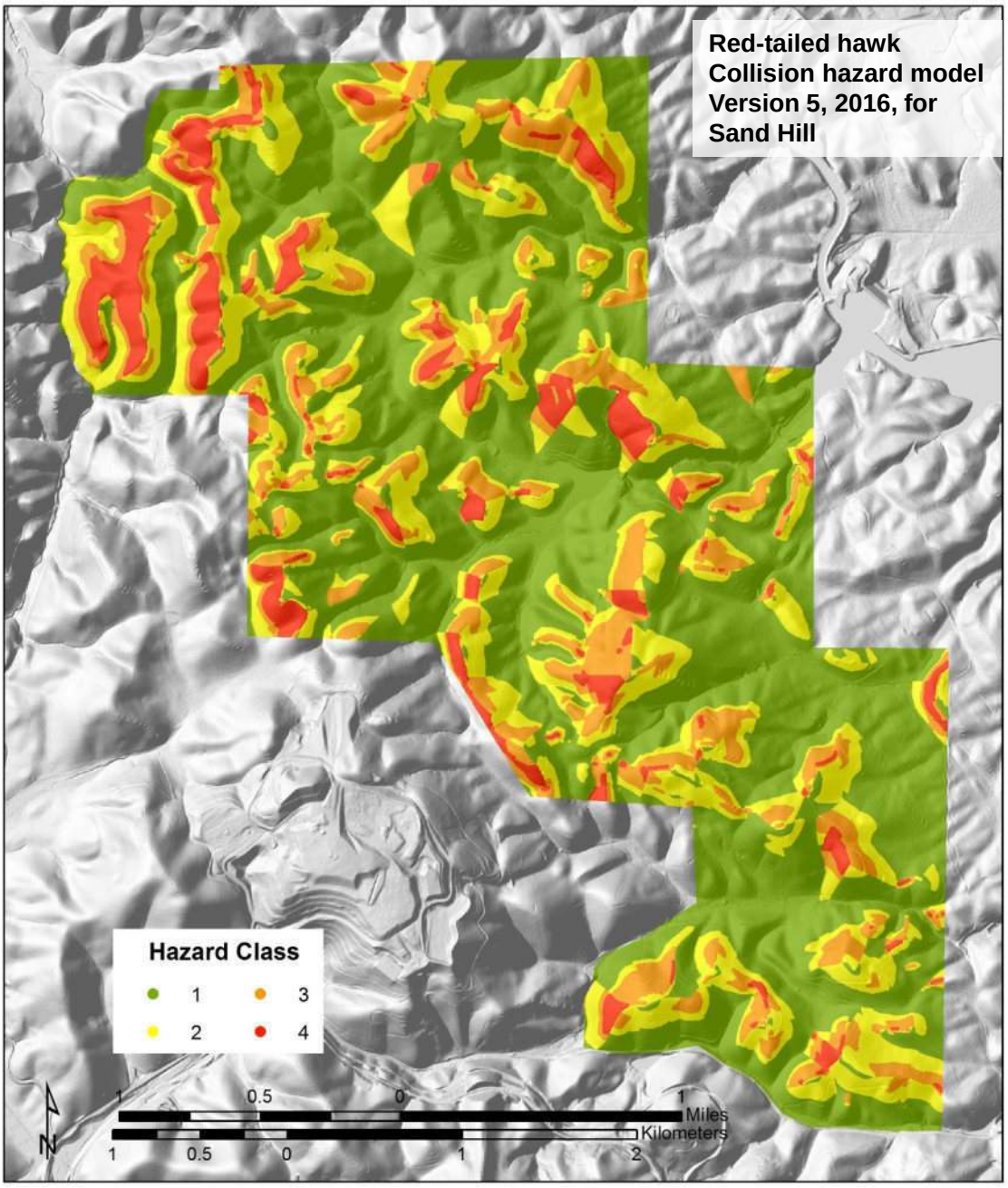


Figure 18. Version 5 of the re-tailed hawk collision hazard classes composed of models developed from behavior data and fatality rates and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

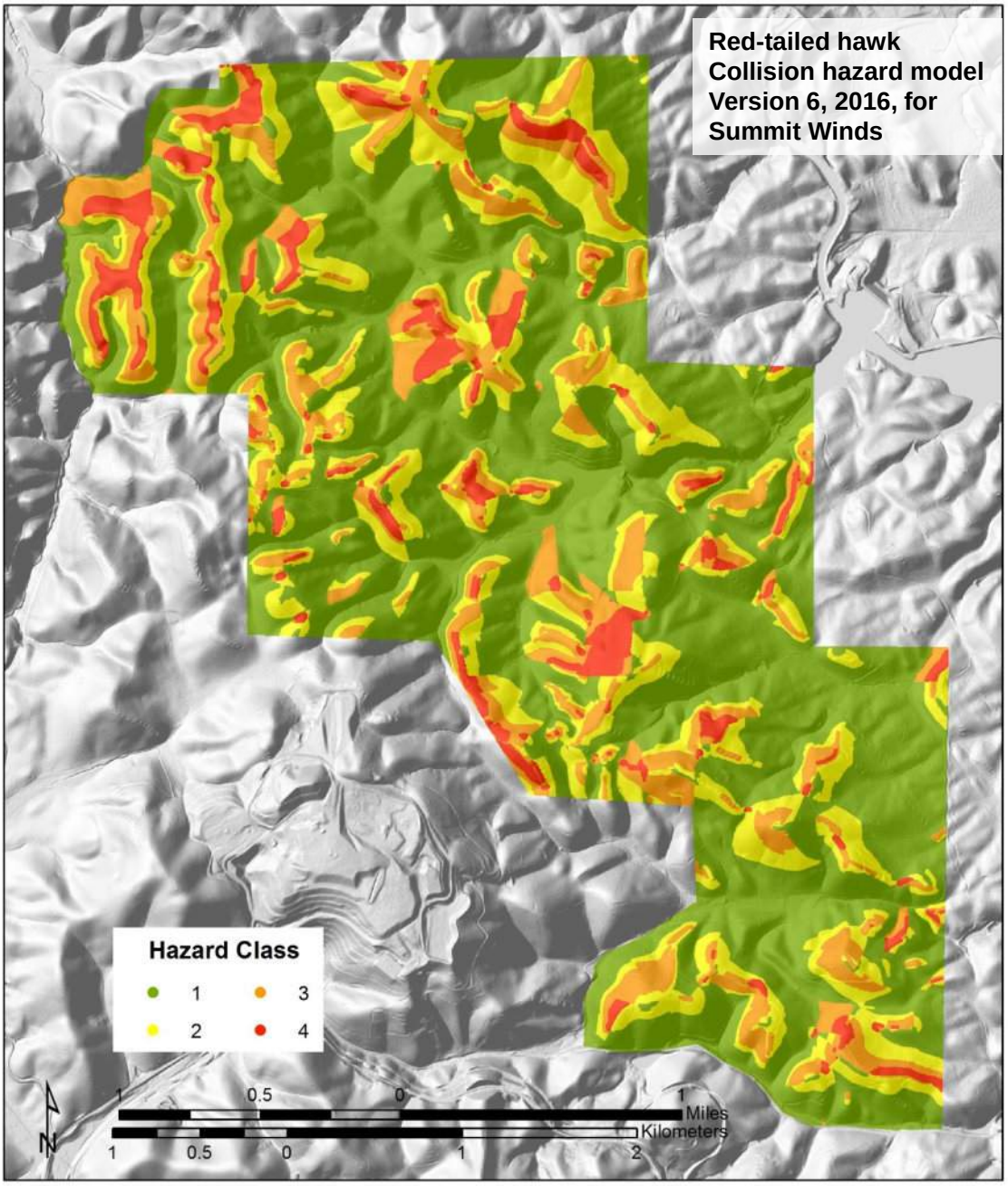


Figure 19. Version 6 of the re-tailed hawk collision hazard classes composed of models developed from behavior data and fatality rates and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

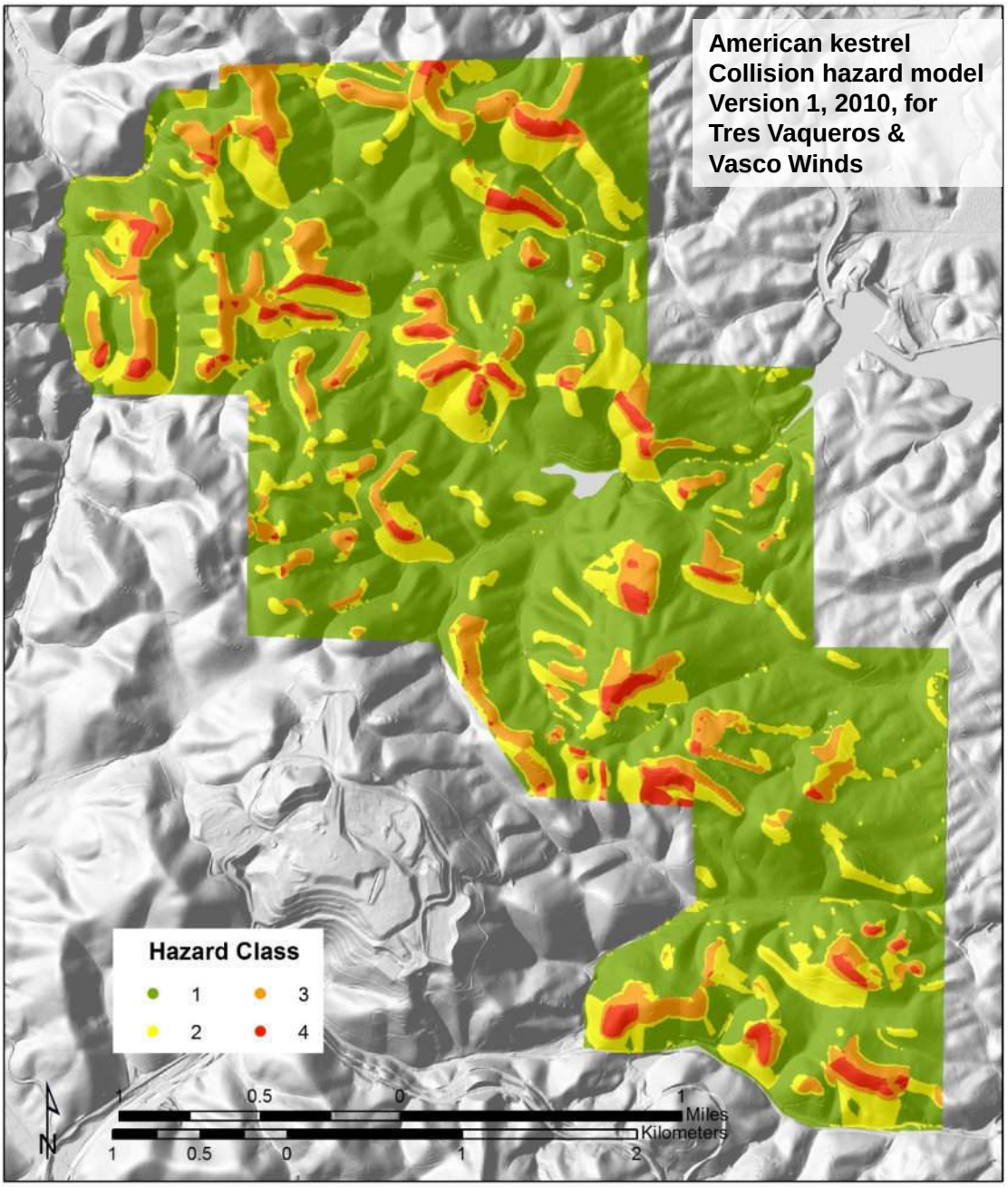


Figure 20. Version 1 of the American kestrel collision hazard classes composed of models developed from behavior data and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

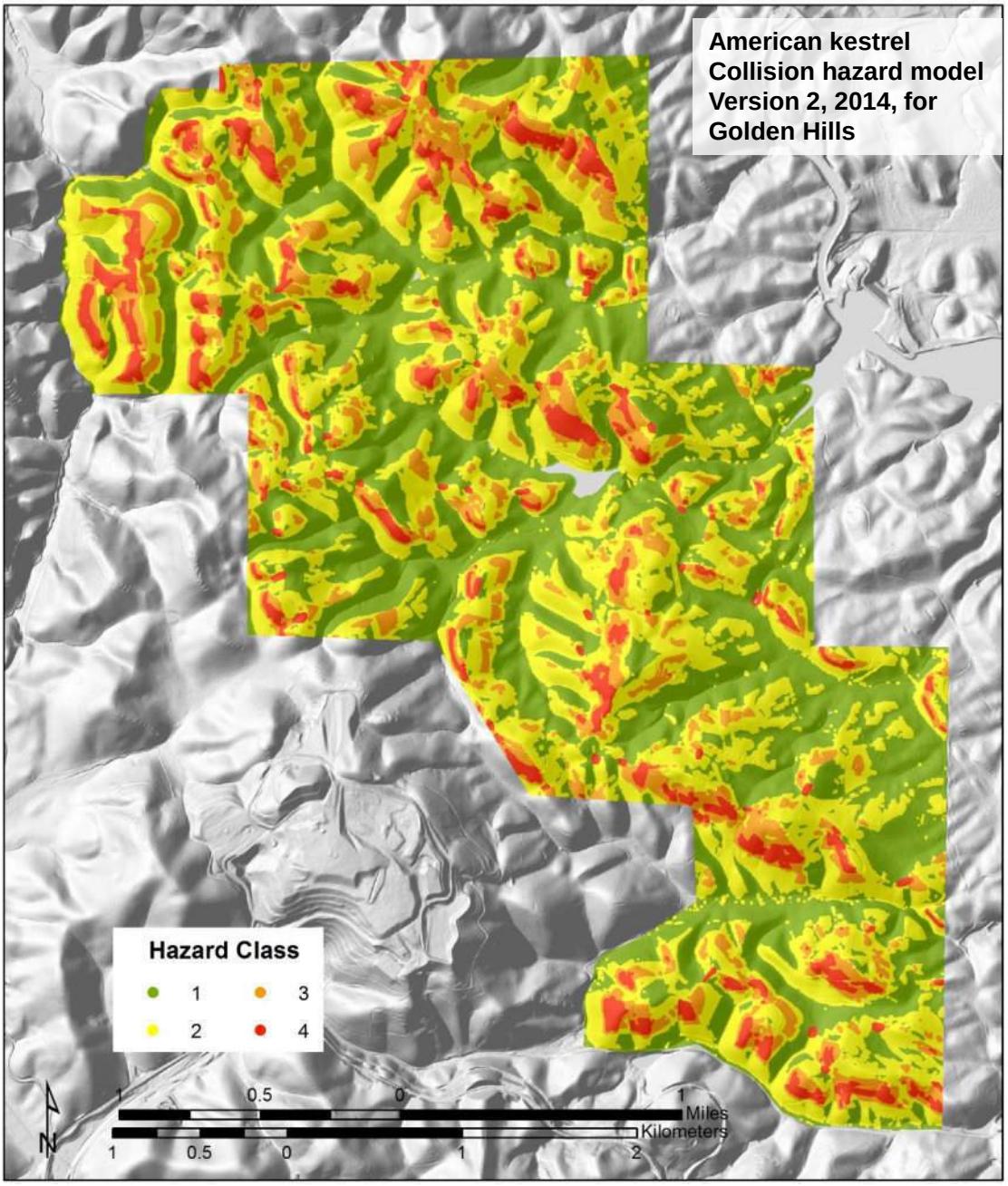


Figure 21. Version 2 of the American kestrel collision hazard classes composed of models developed from behavior data and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

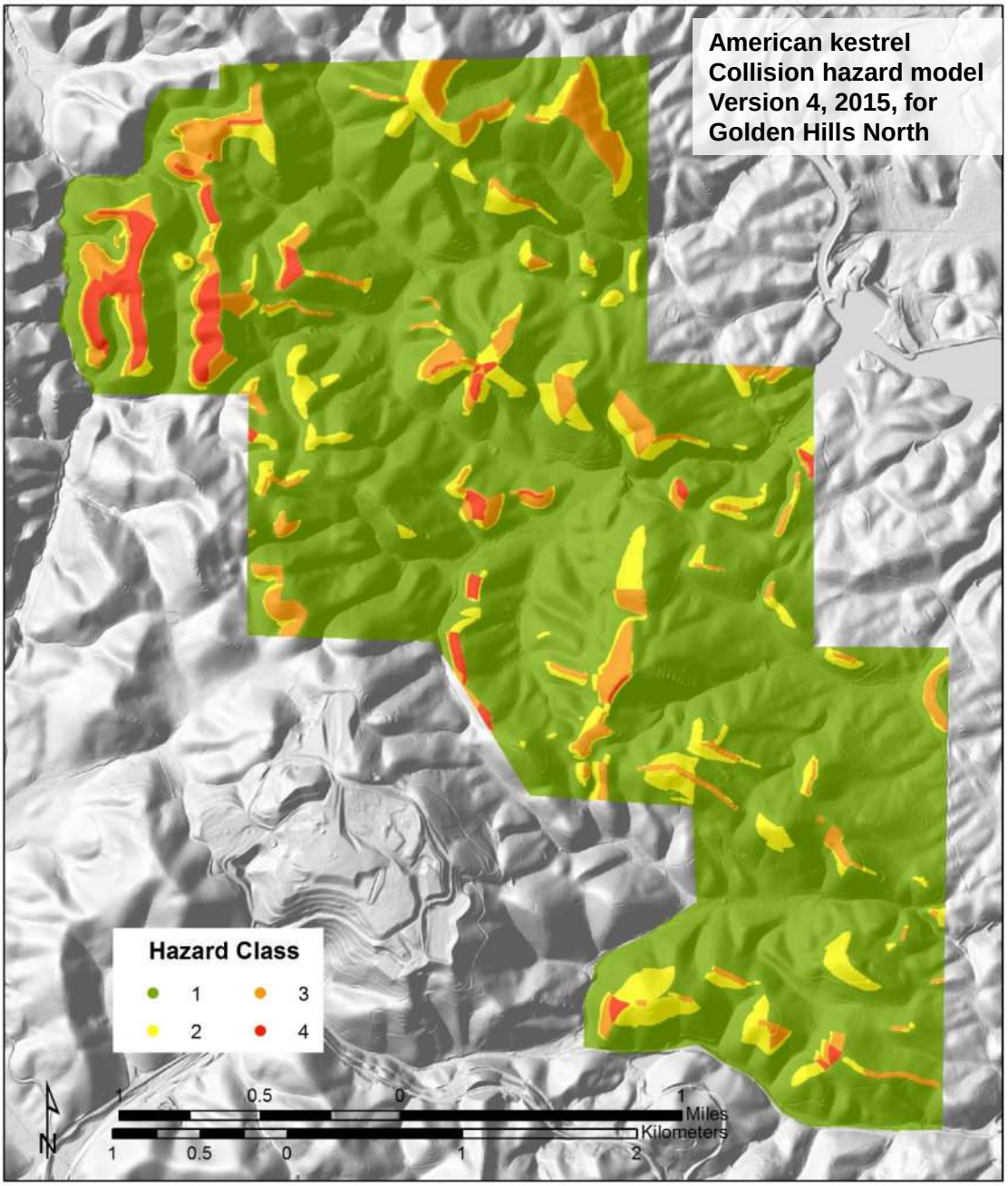


Figure 22. Version 4 of the American kestrel collision hazard classes composed of models developed from behavior data and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

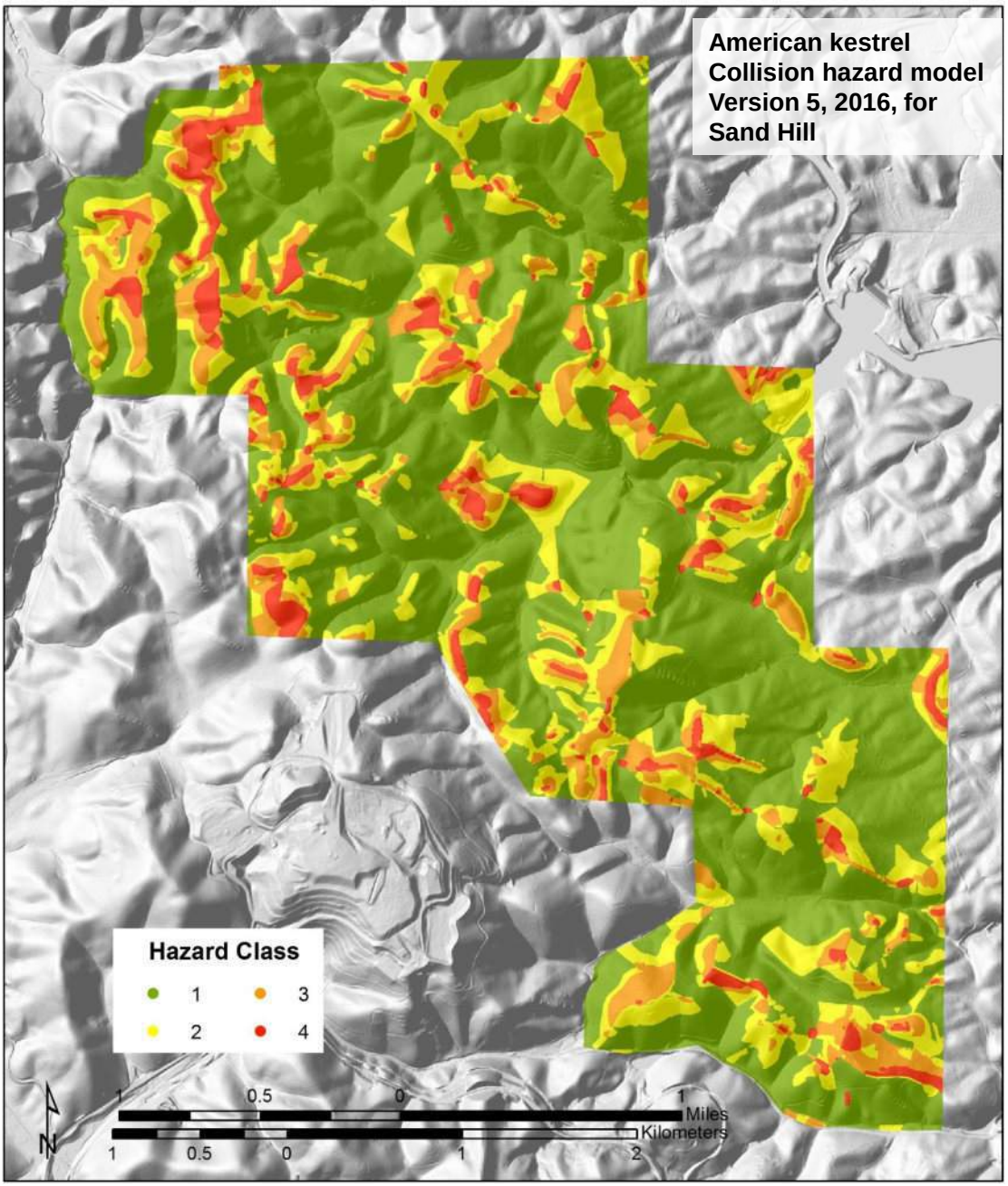


Figure 23. Version 5 of the American kestrel collision hazard classes composed of models developed from behavior data and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

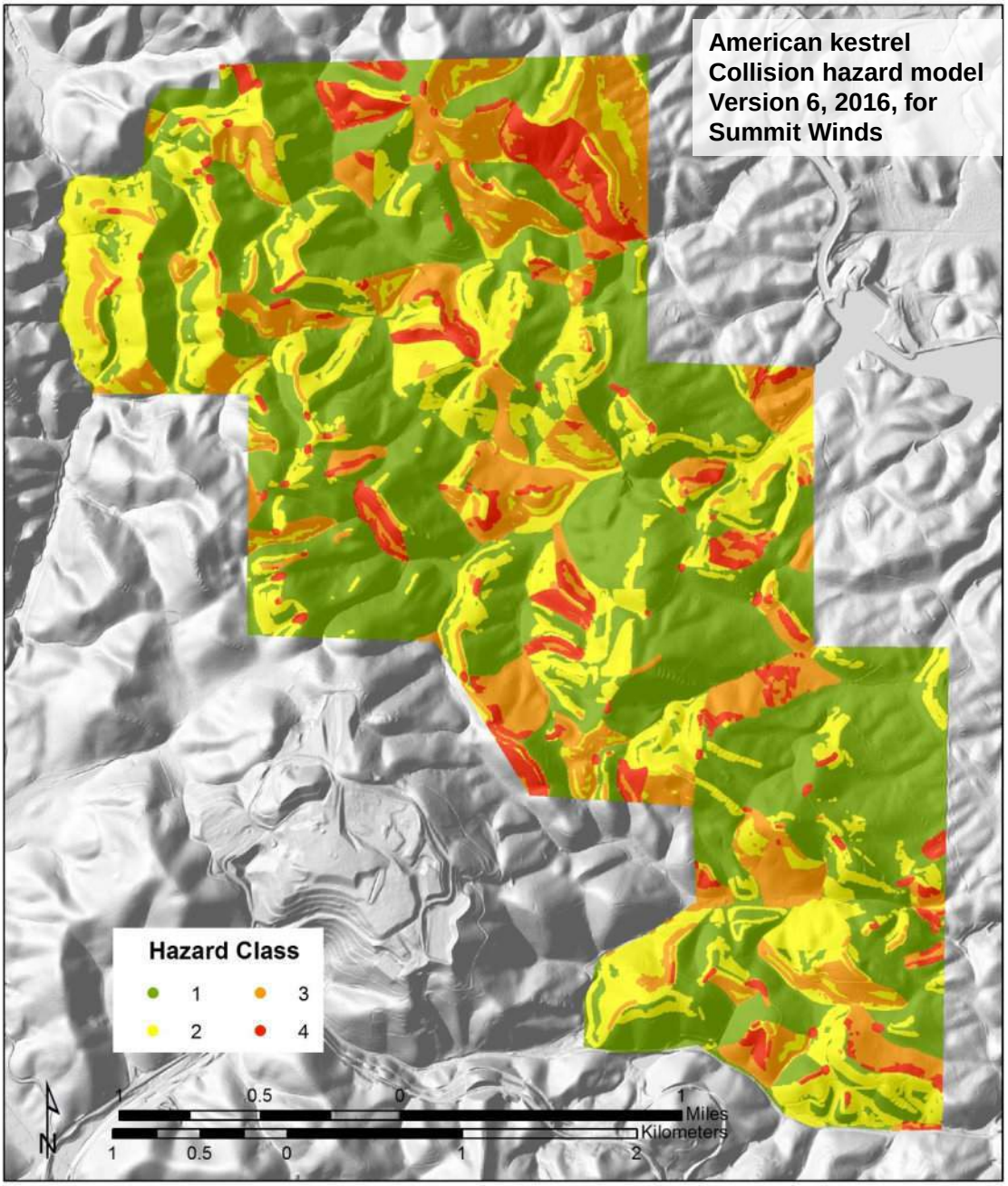


Figure 24. Version 6 of the American kestrel collision hazard classes composed of models developed from behavior data and fatality rates and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

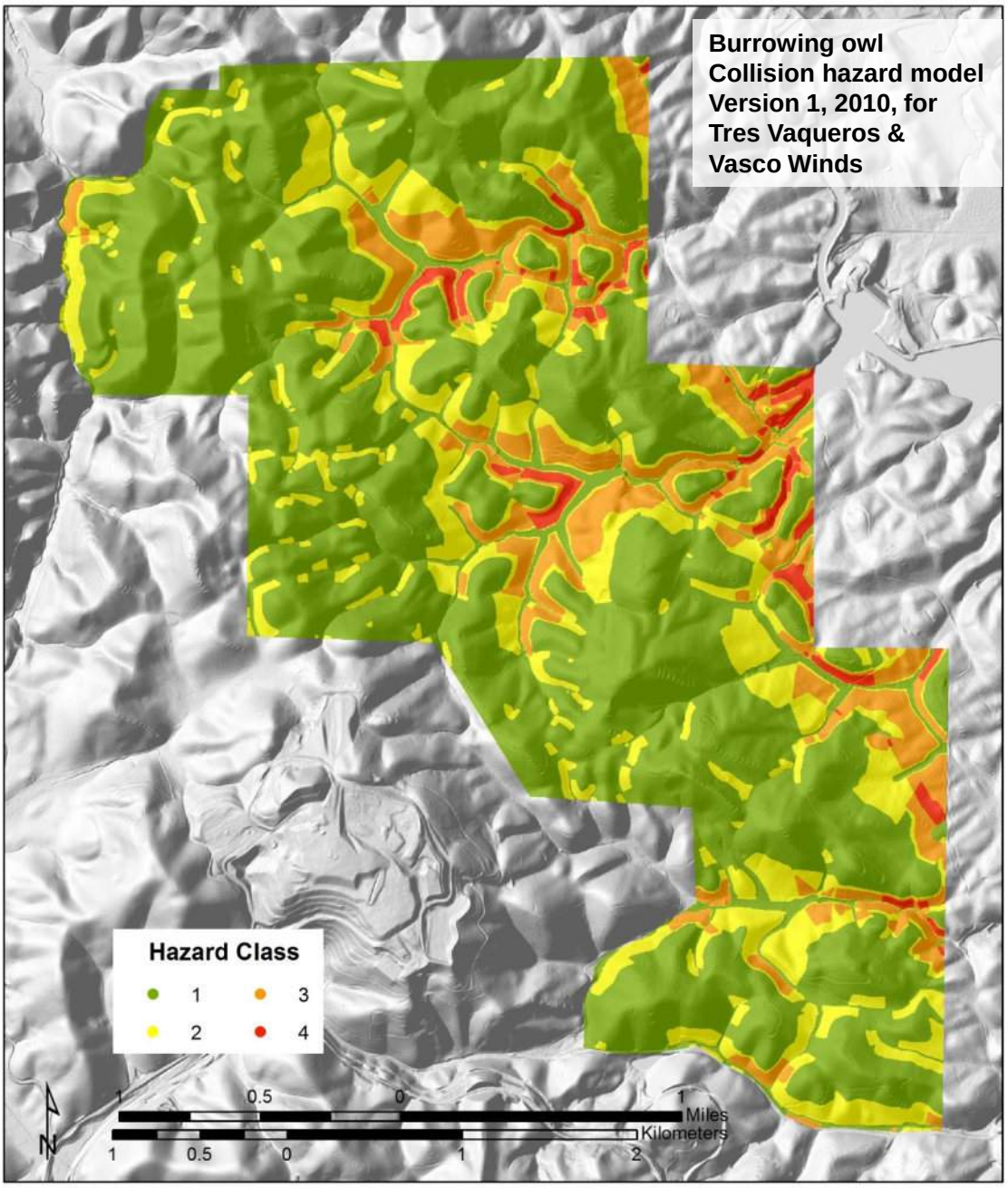


Figure 25. The earliest version of the burrowing owl collision hazard classes composed only of a model developed from burrowing owl locations and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

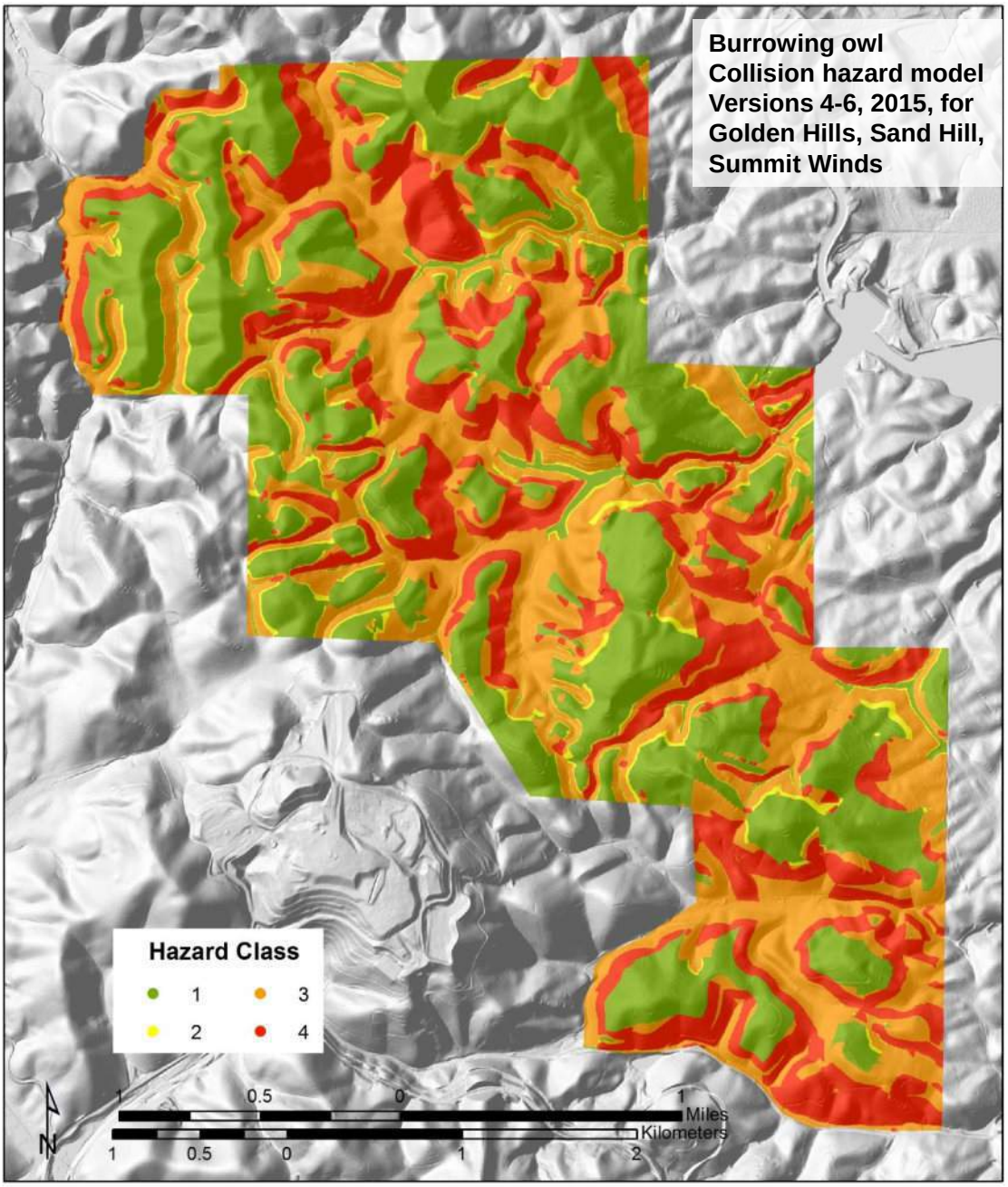


Figure 26. Later versions of the burrowing owl collision hazard classes composed of models developed from burrowing owl locations and fatality rates and extended roughly over the area proposed for the Golden Hills North repowering project in the Altamont Pass Wind Resource Area.

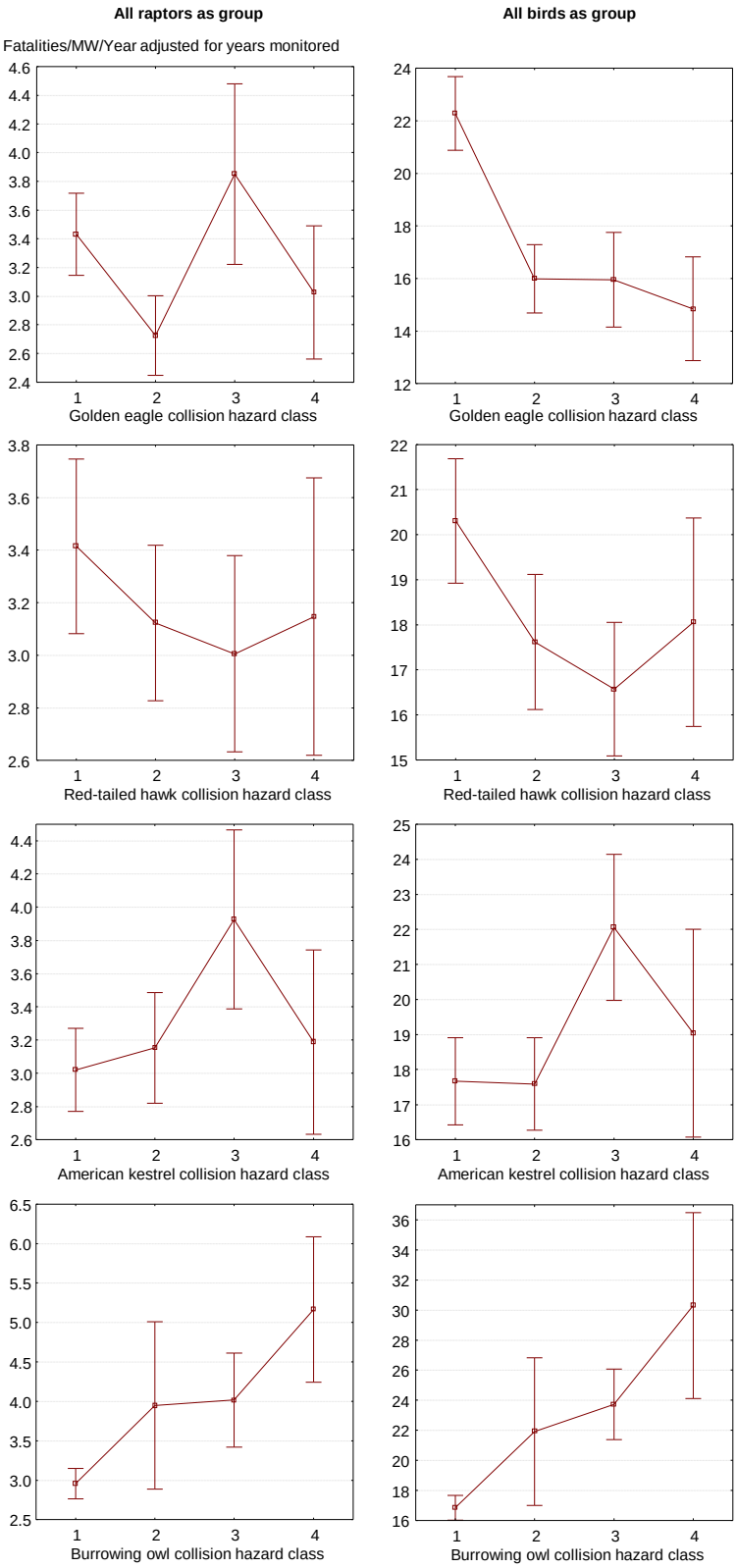


Figure 27. Responses of mean (90% CI) fatalities/MW/year of all raptors as a group (left column) and all birds as a group (right column) to collision hazard classes predicted for golden eagle, red-tailed hawk, American kestrel and burrowing owl.

ATTACHMENT 3

Addendum to Comparison of Wind Turbine Collision Hazard Model Performance: One-year Post-construction Assessment of Golden Eagle Fatalities at Golden Hills

K. Shawn Smallwood

10 April 2018

At the time of this addendum to a report Lee Neher and I prepared last year (Smallwood and Neher 2017a), I was aware of 14 golden eagle fatalities at Golden Hills, including 12 found by the monitor during the first year of fatality monitoring, 1 found a month after the first year of monitoring, and 1 found by me prior to the commencement of monitoring. This number of golden eagle fatalities totaled twice as many as found during three years of fatality monitoring at the similar-sized repowered Vasco Winds project (Brown et al. 2016). An obvious question is whether the collision hazard models used to guide micro-siting (Smallwood and Neher 2015) were effective at Golden Hills. Another related question is whether anything can be learned from the data to improve future repowering projects, as was intended in the 2010 Settlement Agreement among Audubon Society, NextEra Energy, and the California Attorney General.

The question of whether map-based collision hazard models were effective is difficult to answer because the wind turbines were sited to minimize collision risk predicted by the models. Also, the maps produced to depict model predictions of collision hazard were not the only tool used for micro-sting. Expert opinion accompanied the collision hazard models because the models could not account for all of the collision risk posed by complex terrain features and potential changes to terrain made by grading for wind turbine pads and access roads. Expert opinion was provided principally in the form of qualitative hazard ratings on a 0-10 scale, similar to the ratings of old-generation wind turbines made by the Alameda County Scientific Review Committee during the years 2007-2010. I summarized these hazard ratings in a 3 December 2014 report, and I modified or added ratings as the Golden Hills layout changed through the planning period. Expert opinion was also expressed by statements of concern over whether and to what degree the terrain would be altered by grading for wind turbine pads and access roads (Smallwood and Neher 2015). The collision hazard models have always served as a starting point against which other factors are weighed, including other risk factors, collision risk to other focal raptor species, siting constraints such as infra-structure and residence set-back requirements, and company decisions on minimum project size and wind turbine size.

Without an experimental design, such as the opportune before-after, control-impact (BACI) design that was available for the Vasco Winds repowering project (Brown et al. 2016), it cannot be known whether the collision hazard models were truly effective at Golden Hills. Unlike the case of Vasco Winds, fatality rates at Golden Hills cannot be compared to fatality rates estimated from concurrent monitoring at other wind projects in the APWRA because no such monitoring exists. Based on fatality finds alone, there is

no telling whether the first year of monitoring at Golden Hills reflected a peak in relative abundance as part of a multi-annual cycle (see Smallwood 2017a,b). Without use surveys, no use rates could be estimated for comparing relative abundance to fatality rates (Smallwood and Neher 2017b). However, relative abundance data are available. While performing behavior surveys I counted golden eagles from October 2012 through the present. I observed no annual peak in golden eagles corresponding with the first year of fatality monitoring at Golden Hills, nor was there much of a difference in inter-annual eagle counts outside versus inside Golden Hills (Figures 1 and 2). Intriguingly, however, APWRA-wide use rates of golden eagle averaged 1.63× higher during 2013-2017 than compared to 2006-2011 (see Figure 87 in Smallwood and Neher 2017b).

Figure 1. *Monthly relative abundance of golden eagles among 28 behavior observation stations (Smallwood 2016) located throughout the Altamont Pass Wind Resource Area but outside Golden Hills.*

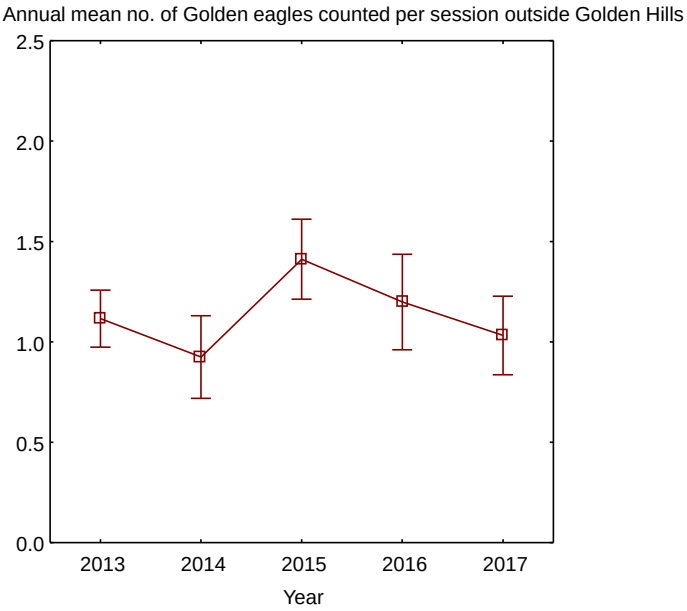
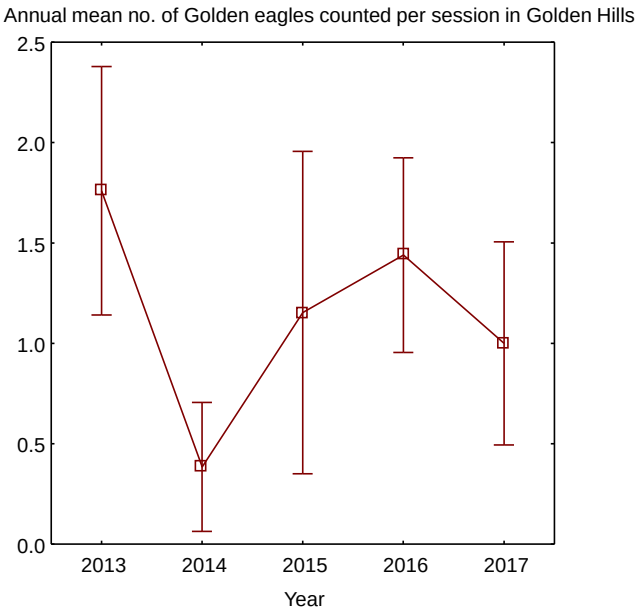


Figure 2. *Annual relative abundance of golden eagle among 5 behavior observation stations located within the Golden Hills project boundary. The year 2017 would largely correspond with the first year of fatality monitoring at Golden Hills, although operations began in January 2016.* Note: All of the 2015 surveys were in April just before construction began, so representation of 2015 was not as balanced as for other years.



Based on the patterns in Figures 1 and 2, it does not appear that golden eagles were any more abundant during the first year of Golden Hills fatality monitoring than during the few preceding years, although they were 46% more abundant that during 2006-2011 (Smallwood and Neher 2017b). Regardless, without an experimental design, there is no way to know whether the number of collision fatalities would have been any different had the wind turbines been sited without regard to collision hazard posed by the terrain. Based on fatality rates preceding repowering (Smallwood and Neher 2017b), it is likely that the number of fatalities would have been higher in the absence of micro-siting. After all, estimates of golden eagle fatalities at the old-generation wind turbines replaced by Golden Hills (same project area and same rated capacity) numbered 17 and 19 in 2006 and 2007 (Smallwood and Neher 2017b), or nearly twice the estimated post-repowering number in 2017.

Although it is impossible to assess the effectiveness of the collision hazard models for the project on the whole, the effectiveness of micro-siting can be assessed among the wind turbines within the project. Micro-siting was not restricted to the use of map-based collision hazard models, but also included my recommendations based on SRC-style hazard ratings and grading concerns. The Golden Hills project is similar in rated capacity to Vasco Winds, but differed in several other respects. Contrary to Vasco Winds, going into the Golden Hills micro-siting we were aware of the potential impacts on collision risk due to grading because we had found golden eagle and red-tailed hawk fatalities where grading had altered the terrain around the associated turbines (Smallwood and Neher 2015). Also contrary to Vasco Winds, at Golden Hills I rated the proposed turbine locations for collision hazard based on my experience with the issue, using the SRC scale of 0-10. Finally, the 1.79-MW turbines at Golden Hills numbered 48, or 14 more than the 2.3-MW turbines built at Vasco Winds, and these 48 went onto a land area that was about 67% of the area of Vasco Winds. The wind turbine density at Golden Hills was more than twice that of Vasco Winds, leaving fewer opportunities for micro-siting to minimize collision hazard and likely creating more locations where grading was needed to accommodate pads and access roads.

Based on the 14 golden eagle fatalities of which I am aware, fatalities per turbine generally increased at Golden Hills with my SRC-style hazard ratings (Figure 3). Wind turbines rated 9 or 9.5 were associated with a mean golden eagle fatality rate that was 5.7× higher than the mean fatality rate at wind turbines I had rated 4 or 5. Wind turbines rated in the 7 or 8 ranges were associated with mean fatality rates that were 1.8× and 2.4× higher than the mean fatality rate of wind turbines I had rated 4 or 5. However, some of my ratings were likely confounded by grading during construction.

Golden eagle fatalities per turbine were highest where grading left berms or cut slopes >3 m within 40 m of the turbine (Figure 3). At these turbines with substantial nearby berms or cut slopes, golden eagle fatalities per turbine numbered 5× higher than at turbines without berms or cut slopes. Berms and cut slopes reduce the effective height above ground that low-flying eagles have to negotiate between the ground and the low reach of the turbine rotor, and the effect increases the closer the distance between turbine tower and the berm or cut slope.

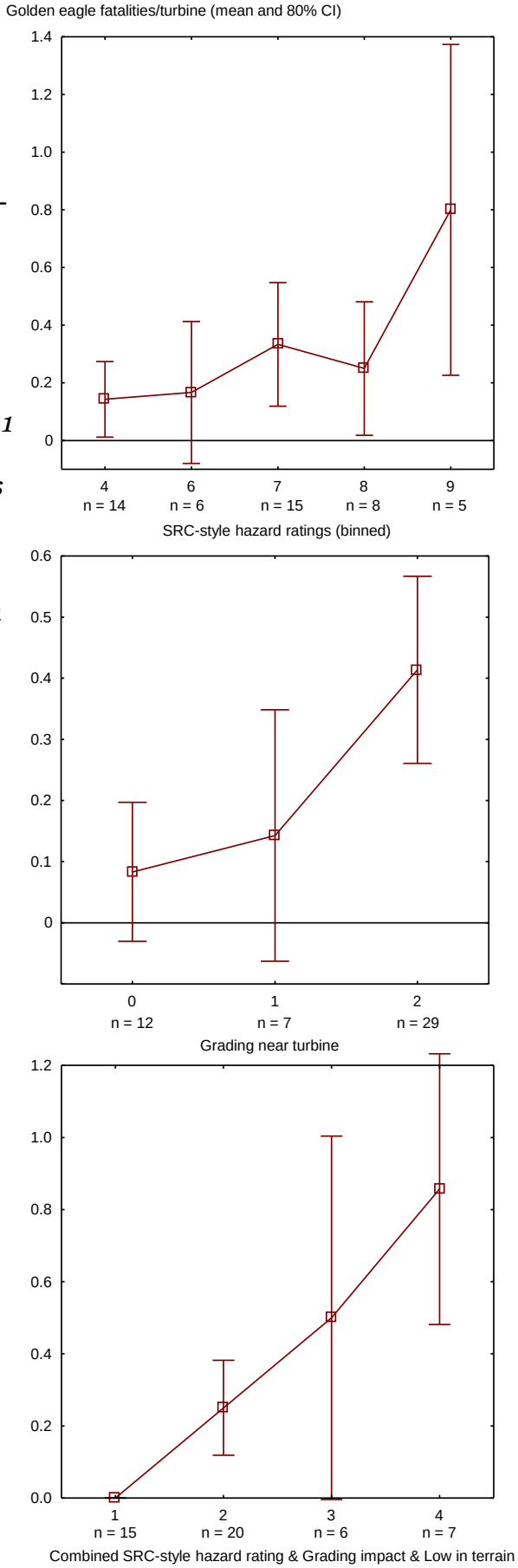


Figure 3. *Golden eagle fatalities per turbine relative to (top) SRC style hazard ratings binned 4 = 3 to 5, 6 = 6 and 6.5, 7 = 7 and 7.5, 8 = 8 and 8.5, and 9 = 9 and 9.5; (middle) Grading within 40 m of the turbine leaving cut slopes or berms of 0 = none, 1 = 1-3 m, and 2 = >3 m; (bottom) Combined indicator of SRC-style hazard rating, grading impact and whether low on declining ridge or within saddle or valley structure. The combined indicator was the sum of the binned SRC rating divided by 9, the binned grading impact weighted by half, 1 for sites low on ridge and 1 for sites within saddle or valley structures, and this sum was binned as 1 = 0 to 1; 2 = 1 to 2; 3 = 2 to 2.8, and 4 = >2.8. I note that I applied SRC-style hazard ratings to 6 turbine addresses post-construction because these turbines had been relocated far from original sites during the planning process.*

Two other terrain factors emerged from an examination of the fatality data, and those were the turbine's position on declining ridgelines and within ridge saddles. My SRC-style ratings would have accounted for these terrain settings at most but not all proposed turbine locations, so these terrain settings warrant additional examination. Golden eagle fatalities at wind turbines located low on declining ridge structures averaged 2.5× other than expected (observed fatalities = 8, expected fatalities = 14 total fatalities × 11/48 wind turbines low on ridge structures = 3.2, so 8 ÷ 3.2 = 2.5). Those found at wind turbines located within a ridge saddle averaged 2.9× more often other than expected. Golden eagle fatalities at wind turbines located both within a ridge saddle and low on declining ridge structures or slopes (n=4) averaged 4.6× other than expected.

Combining my SRC-style ratings, level of grading, and whether the turbine address was low on a declining ridge or slope or within a ridge saddle, golden eagle fatalities among 7 wind turbines averaged 0.857 per turbine (0.5 fatalities/MW), whereas 0 fatalities were found at wind turbines located high on ridge or hill structures, lacking berms or cut slopes, and for which I rated low to moderate hazard (Figure 3). Mean fatality rates increased linearly with this indicator integrating multiple factors (Figure 3).

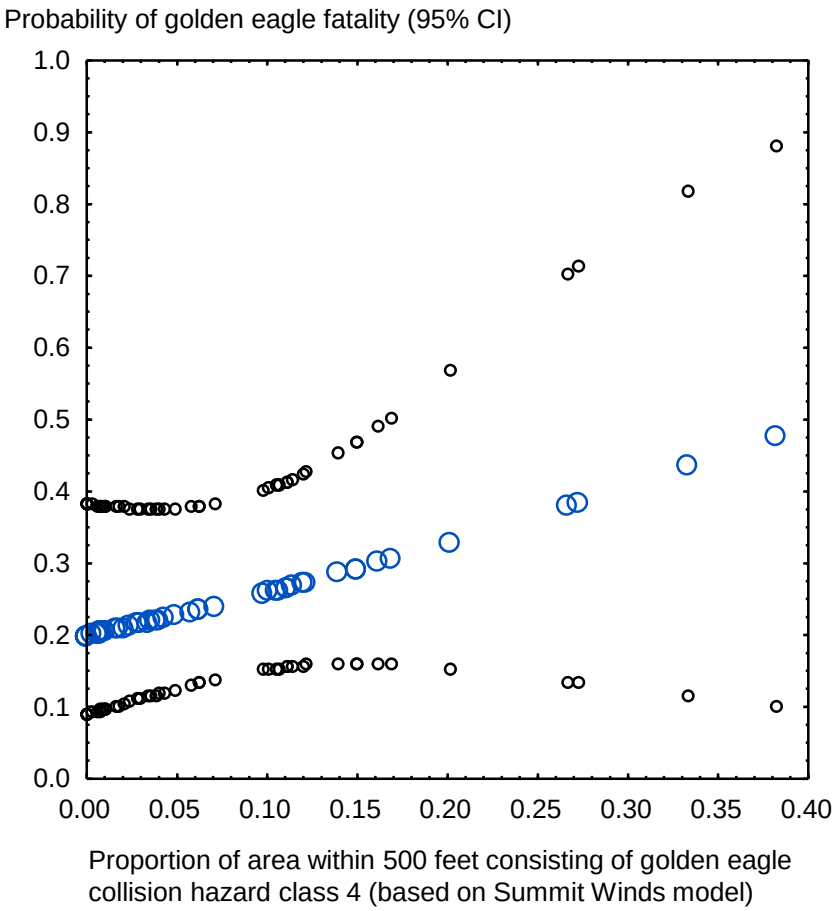
Figure 3 indicates that the process used to derive collision hazard models was fruitful for understanding factors related to golden eagle collisions with wind turbines. The hazard maps were derived from study of hundreds of golden eagle fatalities among old-generation wind turbines located on a landscape that was digitized and measured for dozens of terrain attributes. They were derived from hundreds of hours of behavior surveys, the data from which were also related to terrain attributes. Though not ready for use at the time of micro-siting at Golden Hills, later hazard maps were additionally derived from tens of thousands of GPS telemetry of nearly 30 golden eagles. From all of these data, and from observing the outcomes of repowering at Diablo Winds, Buena Vista, Vasco Winds and Golden Hills, I have learned that extreme grading for access roads and turbine pads can interfere with collision hazard model predictions by adding significant risk to turbine sites. I have also learned that turbines located low on ridge structures or within ridge saddles can be hazardous, even if the turbines are modern and large. These low-lying turbine sites are generally also where grading tends to be more extreme, exacerbating the hazard at these sites. My SRC-style hazard ratings anticipated most of this risk, but turbine sites 3 and 15 at Golden Hills exemplify sites where my ratings were too conservative.

The collision hazard models have advanced since Golden Hills. The most recent model advance was completed in support of the Summit Winds project (Smallwood and Neher 2016). To check whether the latest golden eagle collision hazard model would have predicted fatality locations at Golden Hills, I asked Lee Neher to count the 10x10-foot analytical grid cells within 500 feet of each turbine address that belonged to collision hazard classes 1, 2, 3 and 4, with 1 being the lowest hazard class and 4 the highest hazard class in these models. I converted the counts to areas and divided each by the area of the 500-foot count radius to obtain the proportion of the area consisting of each hazard class. I then logit-regressed whether wind turbines killed one or more golden eagles on the proportion of the 500-foot radius consisting of collision hazard class 4:

$$\hat{F} = \frac{e^{-1.3846+3.3838\times\log_{10} H4}}{1+e^{-1.3846+3.3838\times\log_{10} H4}},$$

where $\hat{F}$ represents the predicted fatality outcome, and H4 represents collision hazard class 4 as a proportion of a 500-foot count radius (Figure 4). According to the Summit Winds model predictions, Golden Hills turbines with 39% of the surrounding area consisting of hazard class 4 were 2.4× more likely to kill golden eagles than turbines with no class 4 within 500 feet. The confidence intervals widen with increasing area in hazard class 4, however, probably due to confounding influence of grading. Even with these increasing confidence intervals, the prediction accuracy of the latest collision hazard model looks good, though still not as good as the expertise developed from iteratively checking field experience against collision hazard models.

Figure 4. *Logit regression model predictions of the probability of Golden Hills wind turbines causing a golden eagle fatality.*



Returning to the obvious question asked as early in this report, the collision hazard models were likely effective at minimizing golden eagle fatalities in the absence of grading, and the modeling process far more effective. However, grading for wind turbine pads and access roads was extensive. It also bears noting that minimizing golden eagle collision hazard was only one of multiple factors contributing to the layout. The wind company decides what wind turbine size to use and how many wind turbines to install in a project, subject of course to County permitting. After deciding on project size and turbine size, the layout is constrained by available land, suitable soils, wind

turbine manufacturer's minimum spacing requirements, opportunity for construction of suitable access roads, sufficient wind, locations of cultural resources, locations of endangered terrestrial species, potential for stream and pond sediment loading, and by setback requirements for residences, property lines, public roads, electric transmission lines, buried pipelines, and microwave transmission. Given all these constraints, the range of optional micro-siting recommendations for bird safety diminishes with increasing wind turbine density in the project area.

Returning to the second question about whether anything can be learned from the data to improve future repowering projects, the patterns reported herein suggest that the collision hazard modeling process revealed terrain settings that increase collision hazard. A decade ago the Alameda County Scientific Review Committee issued wind turbine relocation guidelines based on terrain settings *suspected* to be more hazardous to golden eagles and other raptors. We now *know* that ridge saddles and low-lying terrain are more hazardous, after having recorded many near-misses of flying golden eagles and having collected the GPS transmitters off of golden eagles tracked to their final locations at wind turbines (Bell 2017). I found one of these eagles at a wind turbine within a ridge saddle. Another was found near a turbine at the bottom of a declining ridgeline. One was found at a turbine on a break in slope. Another was found low on a declining ridgeline within a broad ridge saddle. These findings corresponded with the hundreds of documented fatalities of non-telemetered eagles among wind turbines in the Altamont Pass Wind Resource Area. We learned that collision hazard mapping needs to be combined with SRC-style hazard ratings to account for the effects of higher terrain around proposed turbines sites, and to account for interaction effects of construction grading with declining ridgelines and slopes that might create breaks in slope or enhance ridge saddles.

We have learned a great deal about causal factors, but minimizing collision risk will, at least in some cases, require more than the application of collision hazard modeling and expert judgment; it will require sacrifices in project size and micro-siting to optimize wind generation. It will also require reduced grading that avoids leaving tall berms or deeply cut slopes near the turbine.

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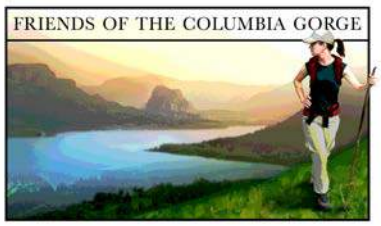

SUBMITTED VIA E-MAIL

Feb. 21, 2019

Oregon Energy Facility Siting Council
c/o Luke May, Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301
luke.may@oregon.gov

Re: Summit Ridge Wind Farm – Request for Amendment 4

Dear Chair Beyeler and Members of the Council:

Friends of the Columbia Gorge, Oregon Wild, the Oregon Natural Desert Association, Central Oregon LandWatch, the Audubon Society of Portland, and the East Cascades Audubon Society (collectively, "Commenters") have reviewed the Request for Amendment 4 ("RFA4" or "Request for Amendment") of the Summit Ridge Wind Farm site certificate, submitted by Summit Ridge Wind, LLC ("Pattern Energy" or "Pattern"),[1] and offer the following comments. In addition, we adopt and incorporate all comments made in the attached comment letter of K.

[1] The site certificate holder is Summit Ridge Wind, LLC. According to the Request for Amendment, Summit Ridge Wind, LLC is a wholly owned subsidiary of Pattern Renewables 2 LP, which is a subsidiary of Pattern Energy Group 2 LP. RFA4 at § 1.0.

Shawn Smallwood, Ph.D. For the reasons that follow, we urge the Council to deny the Request for Amendment 4.

Commenters are nonprofit public interest organizations, with more than 54,000 collective members and supporters, with a strong interest in responsible energy generation and the proper implementation of state law governing the approval, construction, and modification of large energy facilities in Oregon generally, and the Summit Ridge project specifically. Commenter Friends of the Columbia Gorge ("Friends") is a nonprofit organization with approximately 7,000 members dedicated to protecting and enhancing the resources of the Columbia River Gorge. Commenter Oregon Wild represents approximately 20,000 members and supporters who share Oregon Wild's mission to protect and restore Oregon's wildlands, wildlife, and waters as an enduring legacy. Commenter Oregon Natural Desert Association ("ONDA") is a nonprofit, public interest organization whose mission is to protect, defend, and restore Oregon's high desert for current and future generations. ONDA represents more than 10,000 members and supporters. Commenter Central Oregon LandWatch is a conservation organization with more than 200 members that has advocated for the preservation of natural resources in Central Oregon for more than 30 years. Commenter Audubon Society of Portland is a nonprofit, public interest organization with more than 17,000 members that works to promote the enjoyment, understanding, and protection of the natural world—particularly native birds and wildlife and their habitat. Commenter East Cascades Audubon Society ("ECAS") is a nonprofit organization with approximately 400 members. ECAS is involved in conservation projects throughout Central Oregon and promotes enjoyment of birds, birdwatching, and habitat improvement.

Commenters note that the "sufficient specificity" standard for raising issues at this stage pursuant to ORS 469.370(3) and OAR 345-027-0067(5)(b) is a *notice* standard, not a strict *preservation* standard. As applied here, interested persons such as Commenters are not required to *preserve* issues during the public hearing—as one would do in a judicial action in the event of appeal. Instead, interested parties are merely required to put the applicant, ODOE, and EFSC *on notice* of potential issues for any contested case. The Oregon Court of Appeals has interpreted statutory language nearly identical to that in ORS 469.370(3) and OAR 345-027-0067(5)(b) to merely require "no more than fair notice" to decision makers and to not involve "strict preservation principles." *Boldt v. Clackamas County*, 107 Or App 619, 623–24, 813 P2d 1078 (1991) (interpreting ORS 197.763(1) (1991)); *see also Lett v. Yamhill County*, 32 Or LUBA 98, 106–07 (1996) (interpreting ORS 197.763(1) (1996)).

Thus, there are a number of ways that issues may be raised at this stage. An interested person may raise an issue by "referr[ing] to the subject matter of the criteria that the ordinance establishes." *Boldt*, 107 Or App at 624. Or a person may raise an issue by citing a statutory or regulatory provision or by discussing its operative terms. *Lett*, 32 Or LUBA at 107. But persons are not required to do all of the above for every issue raised; to impose such a requirement would conflict with the applicable notice standard.

To the extent that the record of this public hearing does not already include all of EFSC's and ODOE's files on the original site certificate for this project as well as Amendments 1

through 3,[2] Commenters hereby designate and incorporate all such materials as part of the record of this hearing.

As will be explained below, many of the problems with Pattern's Request for Amendment 4 involve Pattern's failures to submit materials demonstrating compliance with the applicable approval standards and criteria. In the event Pattern submits new materials (e.g., surveys, data, reports, analyses, argument, evidence, and/or other information) in the future, Commenters reserve the right to challenge the adequacy and compliance of such material.

1. Because the Request for Amendment was submitted pursuant to invalid rules, it cannot be processed and must be denied.

Because the Request for Amendment was submitted pursuant to invalid rules, it cannot be processed and must be denied. Commenters Friends, Oregon Wild, ONDA, and six other nonprofit public interest organizations are currently challenging these rules in the Oregon Supreme Court, *Friends of the Columbia Gorge v. EFSC*, SC No. S065478. Commenters hereby adopt all legal arguments, facts, and evidence asserted and/or submitted in that case, including the following:

- Pursuant to ORS 183.400(4)(c), the challenged rules are invalid because they were not adopted in compliance with the rulemaking procedures required by ORS 183.335.
    - EFSC and ODOE violated ORS 183.335(2)(d) by failing to provide the public with copies of the proposed rules that clearly showed all proposed changes.
    - EFSC and ODOE violated ORS 183.335(3)(d) by failing to provide the public with a statement identifying how EFSC and ODOE will subsequently determine whether the rules are in fact accomplishing the stated rulemaking objectives.
    - EFSC and ODOE violated ORS 183.335(3)(e)(C) by failing to respond to Petitioners' comments recommending other options for achieving the substantive goals of the rulemaking.

Because the rules invoked by Pattern's Request for Amendment are invalid, the Request for Amendment is likewise invalid and must be denied. *See Homestyle Direct, LLC v. Dep't of Human Serv.*, 245 Or. App. 598, 263 P.3d 1118 (2011) (state agencies may not enforce invalid rules); *Kessler v. Or. Corr. Div.*, 26 Or App 271, 552 P2d 589 (1976) (agency decision reversed and remanded because it applied invalid rules). In addition, because the Request for Amendment is invalid, the August 18, 2018 deadline for Pattern Energy to commence construction has expired. If Pattern desires to move forward on this project after the many years of delay, it will need to file a new application for a new site certificate. Pattern's Request for Amendment can neither be processed nor approved under invalid rules.

Nor can Pattern's Request for Amendment be processed under the rules that were previously in effect, prior to the invalid rules. Pattern expressly and specifically filed its Request for Amendment under the invalid rules, not the prior rules. *See* Final Request for Amendment at

[2] The ODOE Staff Report indicates that "[t]he record [of the public hearing] is based on materials submitted in relation to the application for site certificate, and requests for amendments 1 through 3." Staff Report for Feb. 22, 2019 Council Meeting at 3 n.1.

§ 1.1. The Request for Amendment cannot be retroactively processed under the prior rules, which were not even in effect at the time the Request for Amendment was submitted.

Moreover, even if the prior rules could somehow be applied here, Pattern's Request for Amendment violates the prior rules because the request was submitted only three days prior to the construction start deadline, rather than the six months required under the prior rules. *See* OAR 345-027-0030(1) (2017) ("The certificate holder shall submit a request that includes an explanation of the need for an extension and that conforms to the requirements of 345-027-0060 no later than six months before the date of the applicable deadline, or, if the certificate holder demonstrates good cause for the delay in submitting the request, no later than the applicable deadline."). Nor did Pattern even attempt to explain or demonstrate good cause for its delay in submitting its request, as required by the prior rules. *See id.* For these reasons, the Request for Amendment must be denied, even under the prior rules.

2. Pattern has failed to adequately explain or demonstrate any need for the requested third round of two-year extensions.

It has been more than nine years since the preliminary application for this project was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions. *See* RFA4 at § 1.2.

Pattern is now asking the Council for a third round of extensions. Specifically, Pattern requests to extend both the construction start deadline and the construction completion deadline for a third time, each by two years. Because Pattern has failed to adequately explain or demonstrate any need for the requested extensions, they should be denied.

Assuming that the Request for Amendment can be processed under the current rules, these rules require Pattern to provide "an explanation of the need for an extension." OAR 345-027-0085(1). Pattern fails to adequately address this requirement; instead, it has merely provided the following single sentence:

> Certificate Holder requests Council approval of an extension of site certificate construction deadlines in order to allow the Project to complete development, including obtaining a power purchase agreement, financing, and construction under the requested timeline.

Preliminary Request for Amendment at § 1.3; *see also* Final Request for Amendment at § 1.2 (same).

This single sentence fails to provide sufficient evidence to demonstrate a need for each of the applicable deadlines to be extended by the requested two years. Pattern has failed to provide any details about how far along it may be in "complet[ing] development," nor any explanation of why Pattern has been unable to "obtain[] a power purchase agreement, financing, and

construction under the requested deadline" to date, nor why it might believe that it will be able to complete these tasks in the future if the requested extensions were granted.

In contrast, when the prior certificate holder in 2014 sought what would become the first of two two-year extensions of the construction deadlines, it provided two pages of details documenting all the work it had done in attempt to procure one or more buyers for the power, including naming six specific potential buyers it had negotiated with, attaching a copy of a letter of intent from one of those potential buyers, and discussing the engineering and procurement work it had authorized for the proposed interconnection substation. Request for Amendment 1 at § 1.2 & Ex. A.

For the requested fourth amendment, no such details or information were provided. It is completely unclear whether Pattern has done *any* work in marketing the project, negotiating with potential buyers, or procuring any letters of intent. The status and projected timelines for financing and construction likewise remain a mystery. Nor does Pattern's Request for Amendment 4 discuss the status of the power market in California (where Pattern is based), which was a focal point for the extensions requested as part of Request for Amendment 1.

In addition, Pattern fails to acknowledge that the prior certificate holder stated on February 11, 2016 that "[w]e fully intend to begin construction on Summit Ridge prior to August 19, 2016, as required by Amendment #1." Request for Amendment 2 at § 1.3. Pattern fails to explain why that statement of intent was not honored, nor why the subsequent second extension of the construction start date (to August 19, 2018) was similarly not met.

Pattern also fails to explain or demonstrate why a third round of extensions is needed, given that two prior rounds of extensions were already sought and granted. "When considering whether to grant a request for amendment for a deadline extension . . . , the Council shall consider how many extensions it has previously granted." OAR 345-027-0085(5)(c). Here, two rounds of extensions were already granted. Yet, despite those two extensions, by all outward appearances Pattern appears to be even less ready to proceed with the project than the prior site certificate holder was three years ago. Unlike the prior site certificate holder, Pattern has provided no letters of intent from potential purchasers, nor any details of the expected timeline for the project. The Council should not encourage further delays by granting the requested third round of extensions.

Nor does Pattern demonstrate there is a need to extend *both* the construction start deadline and the construction completion deadline. If the construction start deadline were extended to August 19, 2020, and even if Pattern waited until the day before that deadline to start construction, it would still have an entire year to complete construction (until August 19, 2021), even without any extension of the latter date. Pattern neither explains nor demonstrates why it would need a minimum of three years to complete construction, for a project that should have been constructed years ago.

Under the applicable rules, the Council has authority to approve an extension for *up to* two years. OAR 345-027-0085(5)(d). In other words, the Council could approve an extension, but for a period of *less than* two years. Pattern's Request for Amendment 4 fails to demonstrate

why it needs full two-year extensions of both the construction start deadline and the construction completion deadline, and why extensions of less than two years would not be sufficient.

In summary, Pattern has utterly failed to explain or demonstrate a need for the requested extensions. Accordingly, Request for Amendment 4 should be denied

3. Pattern has failed to demonstrate compliance with the applicable rules and standards for the protection of wildlife, plants, and habitat.

Pattern has failed to demonstrate compliance with the applicable rules and standards for the protection of wildlife, plants, and habitat. For example, Pattern has failed to provide current information about site conditions sufficient to evaluate the project's actual impacts on birds, other wildlife, plants, and habitat. These failures by Pattern are particularly troubling, given the notorious history of this project and its impacts on wildlife and other resources.

In May 2009, a total of 23 active raptor nests and 29 inactive nests were identified within two miles of the project site boundary. Final Application for Site Certificate (Aug. 25, 2010) at § P.6.3 & fig. P-1. In addition, during avian use surveys in 2009, multiple bald and golden eagles were detected in the vicinity of the project. *Id.* at § P.5. On September 20, 2010, in a letter addressed to EFSC and ODOE (attached as an exhibit to this letter), the U.S. Fish and Wildlife Service ("USFWS") concluded that this Project, "including all turbines, transmission and roads, and associated facilities has the potential to result in injury and mortality of individual eagles and potential loss of nest sites over the life of the Project." In the same letter, the USFWS also recommended that no wind turbines for this Project should be sited any closer than six miles from a golden eagle nest (except for in "non-use locations"), that turbine operations should be shut down during peak migration periods, and that turbine lighting should be minimized to protect eagles. The USFWS also wrote that "[i]n the absence of clear solutions to address golden eagle mortalities at wind energy projects, to enhance populations through conservation measures, or to off-set losses in other ways, our best efforts should be directed at avoidance of mortalities by siting wind turbines well away from the areas where resident and migrating eagles are known to concentrate their activities."

Despite these serious concerns stated by the USFWS in 2010, Pattern has failed in 2018–2019 to update the surveys and analyses conducted several years ago by the prior site certificate holder for wildlife and plants. For this project, the most recent habitat mapping and categorizations were conducted in 2009 (but neither the project site nor the proposed mitigation parcels have ever been field surveyed for habitat), the most recent avian use surveys within the proposed wind turbine area were conducted in 2009,[3] the most recent raptor nest surveys were conducted in 2016, and the most recent surveys for threatened and endangered plants were conducted in 2016. RFA4 at § 5.1.8; Summit Ridge Wind Farm, Final Order on Request for Contested Case, Amendment #2, and Transfer Request (Nov. 4, 2016) at § III.B.9. Pattern fails

[3] Both the Request for Amendment 4 and the Draft Proposed Order state that the most recent use surveys were in 2010. To clarify, only the proposed transmission line was surveyed in 2010. The most recent avian use survey within the proposed wind turbine area was in 2009. *See* Summit Ridge Wind Farm Final Order (Aug. 19, 2011) at §§ IV.G.l.a.ii, IV.G.l.a.iii IV.G.l.b.i.

to explain why none of these surveys and other information have been updated for its Request for Amendment 4.

Furthermore, Pattern states in Table 2 of its Request for Amendment 4 that each specific species was either "documented during surveys" or "not documented during surveys," but no details are provided about the applicable date(s) of these surveys, nor the type of survey (*e.g.*, was each species documented during a use survey or a nest survey, or both?). Similarly, in Table 3 of its Request for Amendment, Pattern fails to provide any information about actual, current occurrences of plants listed as threatened or endangered, instead merely rating the "likelihood of occurrence" for each species. This severe lack of details only further exacerbates the paucity of underlying information and data, making it impossible for the Council and the reviewing public to fully understand the project's actual, current impacts.

In addition, in a November 28, 2018 letter, the Oregon Department of Fish and Wildlife ("ODFW") raised concerns about the significant length of time that has passed since this project was first proposed, and the need to reevaluate and update the analyses of the project's impacts on wildlife and habitat, as well as the need to reexamine the potentially available mitigation measures. ("The original site application for this project was received over ten years ago, and recommendations have evolved based on new science as well as ODFW's experience with operational projects. . . . With the proposed start of construction still unknown, ODFW is concerned that current proposed mitigation parcels may no longer meet the original intent for mitigation as outlined in the original mitigation plan.") Pattern has failed to update the data, analyses, and proposals in its Request for Amendment to respond to ODFW's concerns.

Pattern admits that it is "currently performing eagle use surveys [that will] inform updates to eagle occurrence in the analysis area." RFA4 at § 5.1.8. But Pattern fails to provide any details for these "current" eagle surveys, fails to explain why it waited until now to update the eagle surveys, and fails to explain why its "current" surveys are limited to eagles and why it has not instead updated all surveys, maps, and analyses for all species and habitat.

Because Pattern has not disclosed the project's true, current impacts; has not evaluated appropriate mitigation of these impacts; and has not demonstrated current compliance with all applicable approval standards and criteria for the protection of wildlife, plants, and habitat, the requested third round of extensions must be denied. The relevant Council rules and provisions of the Wasco County ordinance will be discussed below.

a. Council Rules

OAR 345-021-0010(1):"The applicant shall include in its application for a site certificate information that addresses each provision of this rule identified in the project order."

* * *

(p) Exhibit P. Information about the fish and wildlife habitat and the fish and wildlife species, other than the species addressed in subsection (q) that could be

affected by the proposed facility, providing evidence to support a finding by the Council as required by OAR 345-022-0060. The applicant shall include:

The language of OAR 345-021-0010(1)(p) expressly requires in pertinent part "[i]nformation about the fish and wildlife habitat and the fish and wildlife species, other than the species addressed in subsection (q)[,] that could be affected by the proposed facility" (emphasis added). In other words, this section requires Pattern to provide information about all fish and wildlife species and habitat that may be affected by the project, except for the species listed by the State of Oregon as threatened or endangered, which are covered separately under OAR 345-021-0010(1)(q). Pattern is violating this requirement by failing to provide current, accurate information about all fish and wildlife species and habitat that could be affected by the proposed facility.

For example, Pattern completely omits from its Request for Amendment 4 *any* information about several special status fish and wildlife species that were actually observed within or near the project site boundary in 2005, 2009, and/or 2010, including the following species:

- Yellow-breasted chat (*Icteria virens auricollis*)
- White-tailed jackrabbit (*Lepus townsendii*)
- Western small-footed bat (*Myotis ciliolabrum*)
- Yuma myotis (*Myotis yumanensis*) or California myotis (*Myotis californicus*)[4]

Yellow-breasted chat (*Icteria virens auricollis*)

White-tailed jackrabbit (*Lepus townsendii*)

/ / /

[4] "Either the Yuma myotis, or California myotis, or both, were detected. The calls of these two species are very difficult to distinguish." Summit Ridge Wind Farm, Final Order (Aug. 19, 2011) at 95 n.204.

Western small-footed bat (*Myotis ciliolabrum*)

Yuma myotis (*Myotis yumanensis*)

Pattern appears to be under the mistaken assumption that it is only required to provide information about fish and wildlife species in the project vicinity if a particular species is listed by the State of Oregon as endangered, threatened, or sensitive in the Columbia Plateau region. *See* RFA4 at 31 ("Table 2 . . . includes only the ODFW Sensitive Species as required to meet the standard."), 34 ("Table 3 . . . omit[s] the federal status and update[s] the current state status of species."). Pattern's assumptions are incorrect. OAR 345-021-0010(1)(p) requires the applicant to provide information about *all* fish and wildlife species that may be affected by the project, regardless of the species' listing status. Nevertheless, most or all of the omitted species discussed above are in fact listed as federal species of concern and/or as state sensitive species. Pattern is violating OAR 345-021-0010(1)(p) by failing to disclose that these species were previously observed within or near the project site, and by failing to evaluate the project's impacts on these and other species and their habitat.

In fact, Pattern's omissions of these previously observed and disclosed species raises questions about what *other* wildlife species may be present in the project vicinity, but may have been similarly omitted from the Request for Amendment. Two examples of such species, which were previously documented within the project area and acknowledged "to be at the highest risk of collision at the proposed site," are the American kestrel (*Falco sparverius*) and the red-tailed hawk (*Buteo jamaicensis*). Summit Ridge Wind Farm Final Order (Aug. 19, 2011) at 99.

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American kestrel (*Falco sparverius*)

Red-tailed hawk (*Buteo jamaicensis*)

Again, Pattern is required to provide current, accurate information about *all* fish and wildlife species that may be affected by the project, whether or not a particular species is listed by federal or state authorities. This required information is neither optional nor waivable. Pattern is in violation by failing to disclose the required information, and these failures in turn taint other required components of the application. For example, without current, complete information about the presence, distributions, and relative abundance of all fish and wildlife species actually present in the project vicinity, it is difficult or impossible to fully assess the categorization and suitability of habitat at the project site. The presence or absence of specific species is often an

important indicator of the characteristics of wildlife habitat.[5] By failing to provide the required information, Pattern is violating the Council's rules and making it impossible to determine that the Request for Amendment complies with the applicable substantive standards.

> *(A) A description of biological and botanical surveys performed that support the information in this exhibit, including a discussion of the timing and scope of each survey.*

Pattern has failed to conduct any new biological or botanical surveys to support its request for a third round of construction extensions. Instead, it broadly cites species observations made in previous surveys, some of which have not been updated for nearly a decade. Pattern also fails to provide details when each specific species was observed, which type of survey was involved for each species (*e.g.*, use survey or nest survey), which portion of the project a species was observed in (*e.g.*, within the transmission line area or the turbine corridors area), or any other information about the scope of each survey. As a result of these omissions, it is impossible to evaluate the project's current impacts on fish, wildlife, and plant species and habitat. Pattern is in violation of OAR 345-021-0010(1)(p)(A).

> *(B) Identification of all fish and wildlife habitat in the analysis area, classified by the general fish and wildlife habitat categories as set forth in OAR 635-415-0025 . . . and a description of the characteristics and condition of that habitat in the analysis area, including a table of the areas of permanent disturbance and temporary disturbance (in acres) in each habitat category and subtype.*

Pattern has not conducted field surveys assessing habitat for this project, and the most recent "desktop" categorizations and mapping occurred in 2009. Pattern seeks to extend the construction deadlines by another two years, which could mean the project might not be operational until 2023. Without current, accurate surveys, categorizations, and mapping, it is impossible for the Council and the reviewing public to evaluate the project's impacts on fish and wildlife habitat. Pattern is in violation of OAR 345-021-0010(1)(p)(B).

> *(C) A map showing the locations of the habitat identified in (B).*

Again, Pattern has failed to conduct any field surveys of habitat for this project, and there have been no habitat categorizations or mapping since 2009. The habitat maps are deficient, not current, and must be updated. Without current, accurate habitat mapping, it is impossible for the Council and the reviewing public to evaluate the project's current impacts on fish and wildlife habitat. Pattern is in violation of OAR 345-021-0010(1)(p)(C).

[5] One example is the Oregon vesper sparrow (*Pooecetes gramineus affinis*). Pattern's amended Draft Habitat Mitigation Plan implies that this species will be affected by the project, and ties this impact to its proposals for habitat mitigation, but there is no disclosure elsewhere in the Request for Amendment as to the presence, abundance, and distribution of this species within the project site. *See* Draft Habitat Mitigation Plan (Jan. 2019) at 3.

> *(D) Based on consultation with the Oregon Department of Fish and Wildlife (ODFW) and appropriate field study and literature review, identification of all State Sensitive Species that might be present in the analysis area and a discussion of any site-specific issues of concern to ODFW.*

Pattern fails to provide any evidence that it consulted with ODFW in 2018 or 2019 regarding the project's current impacts to fish and wildlife and habitat. Nor does Pattern provide in its Request for Amendment 4 a discussion of any site-specific issues of concern to ODFW, as required by the rule.

The record does contain a November 28, 2018 comment letter from ODFW to ODOE, but ODFW's letter merely contains a general discussion of applicable statutes, rules, and policies, plus a statement that the required analyses of habitat impacts and potential mitigation measures might be deferred to a later, unspecified date, presumably after the Request for Amendment might be approved (without any legal analysis of whether such deferrals would be lawful). The existence of this letter does not satisfy the requirements of OAR 345-021-0010(1)(p)(D), which expressly requires Pattern Energy to consult with ODFW about the sensitive species that may be present in the analysis area and to discuss, in its application, any site-specific issues of concern to ODFW. (There is no evidence in the record that Pattern even asked ODFW to provide any site-specific issues of concern.) The required consultation and discussion cannot be deferred to a future date, after EFSC's decision on the application.

Nor has Pattern conducted any habitat field studies, as required by the rule. Pattern notes in the Request for Amendment 4 that much of the project site was burned by wildfires in 2018, and implies that it has conducted updated "desktop analysis" of the habitat areas and burned areas. However, "desktop analysis" is not an adequate substitute for "field study"; the latter is required by the rule.

As for literature review, Pattern indicates that it reviewed the October 2018 version of the ORBIC database and the current Oregon state lists of wildlife and plants, but there is no indication of any other literature review. For the original application for this project, the prior site certificate holder reviewed plant and wildlife studies from seven other wind projects. Summit Ridge Wind Farm Final Order (Aug. 19, 2011) at 93. Since then, numerous other wind projects have been proposed in the area, yet Pattern fails to mention this fact, nor explain whether it has reviewed the surveys from these other wind projects, nor any other recent surveys in the vicinity.

By failing to consult with ODFW, by failing to update the field studies and literature review, and by failing to provide a discussion of ODFW's site-specific issues of concern, Pattern is in violation of OAR 345-021-0010(1)(p)(D).

> *(E) A baseline survey of the use of habitat in the analysis area by species identified in (D) performed according to a protocol approved by the Department and ODFW.*

Pattern ignores this requirement. The avian use surveys for this project have apparently not been updated since 2010. Pattern has failed to conduct any current baseline use surveys.

In addition to the 2010 avian use surveys, other surveys were previously conducted (*e.g.*, the bat inventory in 2009 and the raptor nest surveys in 2015 and 2016), but these surveys are also not current. In addition, Pattern has not demonstrated that these other surveys constitute the "baseline survey[s] of the use of habitat" required by the rule. For example, an inventory that merely lists the bat species detected in the project area tells the Council and the reviewing public nothing about the relative prevalence of each bat species at this site, the location(s) where each species was detected, nor the seasons when each species was detected. Moreover, even if the prior surveys *were* sufficient to supply the required baseline data, they were conducted years ago, so they no longer provide current, accurate baselines. Pattern has failed to meet the requirements of OAR 345-021-0010(1)(p)(E).

> *(F) A description of the nature, extent and duration of potential adverse impacts on the habitat identified in (B) and species identified in (D) that could result from construction, operation and retirement of the proposed facility.*

Pattern largely ignores this requirement, and the information that it does provide is inadequate to demonstrate compliance. For example, Pattern fails to disclose which season(s) each migratory bird and bat species has been documented at the site, and the relative abundance of each species at the site, thus making it impossible to evaluate the extent and duration of potential adverse impacts to each species. Moreover, Pattern's failure to provide adequate, current baseline use surveys and habitat data renders defective its descriptions of the project's potential impacts. Pattern has failed to meet the requirements of OAR 345-021-0010(1)(p)(F).

> *(G) A description of any measures proposed by the applicant to avoid, reduce, or mitigate the potential adverse impacts described in (F) in accordance with the general fish and wildlife habitat mitigation goals and standards described in OAR 635-415-0025 . . . , and a discussion of how the proposed measures would achieve those goals and requirements.*

Pattern fails to comply with this requirement. Instead of describing proposed measures to avoid, reduce, or mitigation potential adverse impacts, and instead of discussing how the proposed measures would achieve the applicable goals and requirements, as expressly required by the rules, Pattern merely notes that the prior habitat delineations, which were prepared nearly a decade ago (in 2009), were previously deemed by the Council to meet the applicable requirements. RFA4 at 30. Because Pattern has failed to update its data and analyses to reflect current conditions and best available science and technologies, there are no assurances that the proposed project continues to comply with the applicable rules and standards.

Furthermore, Commenters object to the Draft Habitat Mitigation Plan (January 2019) as insufficient to demonstrate that the project will avoid, reduce, or mitigate potential adverse impacts to wildlife species and habitat in compliance with the applicable Council rules and the applicable fish and wildlife habitat mitigation goals and standards. Among other problems, the

Draft Habitat Mitigation Plan is not based on actual, current habitat surveys (neither the project area nor the proposed mitigation parcels have been field surveyed for habitat), it fails to include binding provisions requiring Pattern to acquire the legal rights to ensure permanent protection for the proposed Habitat Mitigation Area, it fails to incorporate state standards for protecting habitat in any binding, meaningful way, it fails to prohibit cattle grazing, and it defers consultation with and review by ODFW of the proposed mitigation measures until a future, unspecified date.

In fact, there is no evidence as to whether the current version of the Draft Habitat Mitigation Plan has been reviewed or approved by ODFW.[6] For example, the Draft Habitat Mitigation Plan is dated January 2019—more than a month *after* ODFW's most recent comments on the project (in November 2018). In those comments, ODFW stated that "ODFW is concerned that current proposed mitigation parcels may no longer meet the original intent for mitigation as outlined in the original mitigation plan." The January 2019 Draft Habitat Mitigation Plan states that "[t]he referenced parcels for mitigation have been discussed with ODFW." Draft Habitat Mitigation Plan at 3. However, Pattern does not state *when* these discussions occurred. Most likely this is a reference to the discussions of the original mitigation proposal from the original application (circa 2009–2011). In fact, the four proposed mitigation parcels have not changed since that original application, and Pattern admits as much by referring to these parcels as "the previously proposed mitigation sites" and conceding that the parcels may be "determined not to have sufficient quality and quantity of habitat to meet ODFW's mitigation goals for the permanent and temporal habitat impacts from facility construction." *Id.* There is no indication as to ODFW's current conclusions as to whether the proposed mitigation parcels (and the Draft Habitat Mitigation Plan) are satisfactory to ODFW; to the contrary, ODFW's November 2018 comments imply otherwise.

> *(H) A description of the applicant's proposed monitoring plans to evaluate the success of the measures described in (G).*

In its amended Draft Habitat Mitigation Plan (2019), Pattern has failed to include specific and binding monitoring requirements, reporting requirements, and success criteria, instead supplying vague and general statements that the "monitoring protocol[s]" and "details of monitoring time frames and success criteria will be designed after the final site is selected." Draft Habitat Mitigation Plan (2019) at 5. Commenters object to the Draft Habitat Mitigation Plan as insufficient to demonstrate compliance with the Council's rules and the applicable fish and wildlife habitat mitigation goals and standards. Moreover, Pattern cannot defer a demonstration of compliance with these rules to a future, unspecified date, after its Request for Amendment 4 is approved. A demonstration of compliance with the applicable law is required *now*. Both the reviewing public and the Council have a right to obtain and review this information prior to a final Council decision.

> *(q) Exhibit Q. Information about threatened and endangered plant and animal species that may be affected by the proposed facility, providing evidence to*

[6] It should be noted that the ultimate responsibility for determining compliance with the applicable rules and standards for the protection of wildlife and wildlife habitat lies with the Council. However, review of these issues by ODFW can be relevant, and in some cases instructive, for the Council's ultimate decisions.

support a finding by the Council as required by OAR 345-022-0070. The applicant shall include:

> *(A) Based on appropriate literature and field study, identification of all threatened or endangered species listed under ORS 496.172(2) and ORS 564.105(2) that may be affected by the proposed facility.*

As with the counterpart standard for sensitive species required by OAR 345-021-0010(1)(p)(D), Pattern fails to provide sufficient evidence to demonstrate that it has updated the prior literature reviews and field studies for this proposed project to identify all threatened or endangered species that may be affected by the project. Instead, Pattern merely lists the four plant species and one bird species that were previously determined to possibly occur within the project area. RFA4 at Table 3. There is no evidence that Pattern has conducted any current field surveys of the project site, nor any evidence that Pattern has reviewed any other surveys in the vicinity, or by other nearby wind projects. By failing to update the literature reviews and field studies, Pattern is in violation of OAR 345-021-0010(1)(q)(A).

> *(B) For each species identified under (A), a description of the nature, extent, locations and timing of its occurrence in the analysis area and how the facility might adversely affect it.*

When Pattern's predecessor sought the second round of construction extensions for this project, it conducted new bird nest surveys, as well as new surveys for endangered and threatened plants, in order to ensure that no such species were located within the project area. Pattern's predecessor conducted these surveys in both 2015 and 2016. Final Order on Request for Contested Case, Amendment #2, and Transfer Request (Nov. 4, 2016) at § III.B.9.

In contrast, now that Pattern owns the project, it has apparently failed to update any of these surveys, nor complete any other new surveys for wildlife or plants (except for the undisclosed surveys for bald eagles that Pattern alleges it is currently conducting). Because Pattern has failed to update these surveys—yet is seeking extensions that could further delay construction and operation of the proposed facility by several more years—Pattern has failed to demonstrate compliance with OAR 345-021-0010(1)(q)(B). Nor does Pattern describe "the nature, extent, locations, and timing" of the occurrence of each species in the analysis area, nor "how the facility might adversely affect" the species if it is present, as required by the rule.

> *(C) For each species identified under (A), a description of measures proposed by the applicant, if any, to avoid or reduce adverse impact.*
>
> *(D) For each plant species identified under (A), a description of how the proposed facility, including any mitigation measures, complies with the protection and conservation program, if any, that the Oregon Department of Agriculture has adopted under ORS 564.105(3).*
>
> *(E) For each plant species identified under paragraph (A), if the Oregon Department of Agriculture has not adopted a protection and conservation*

program under ORS 564.105(3), a description of significant potential impacts of the proposed facility on the continued existence of the species and on the critical habitat of such species and evidence that the proposed facility, including any mitigation measures, is not likely to cause a significant reduction in the likelihood of survival or recovery of the species.

(F) For each animal species identified under (A), a description of significant potential impacts of the proposed facility on the continued existence of such species and on the critical habitat of such species and evidence that the proposed facility, including any mitigation measures, is not likely to cause a significant reduction in the likelihood of survival or recovery of the species.

Because Pattern has not updated its wildlife and plant surveys to demonstrate compliance with OAR 345-021-0010(1)(q)(B), it has also failed to demonstrate compliance with OAR 345-021-0010(1)(q)(C), (D), (E), and (F).

OAR 345-022-0060
Fish and Wildlife Habitat

To issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, are consistent with:

(1) The general fish and wildlife habitat mitigation goals and standards of OAR 635-415-0025(1) through (6) in effect as of February 24, 2017 . . . .

As discussed above, Pattern has failed to complete current habitat surveys, mapping, and categorizations; literature reviews; and field surveys for wildlife and plants. In addition, Pattern has substantially weakened its proposed mitigation measures and has failed to take into account the latest science and technologies for avoidance and mitigation of impacts. Pattern has also failed to demonstrate consultation with and approval by ODFW, under current standards and conditions, of the project's impacts and proposed mitigation measures. As a result of these failures, it is impossible for the Council to conclude that the design, construction, and operation of the facility, taking into account mitigation, are consistent with the applicable fish and wildlife habitat mitigation goals and standards. The requested third round of construction extensions should be denied.

OAR 345-022-0070
Threatened and Endangered Species

To issue a site certificate, the Council, after consultation with appropriate state agencies, must find that:

/ / /

(1) For plant species that the Oregon Department of Agriculture has listed as threatened or endangered under ORS 564.105(2), the design, construction and operation of the proposed facility, taking into account mitigation:

(a) Are consistent with the protection and conservation program, if any, that the Oregon Department of Agriculture has adopted under ORS 564.105(3); or

(b) If the Oregon Department of Agriculture has not adopted a protection and conservation program, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species; and

(2) For wildlife species that the Oregon Fish and Wildlife Commission has listed as threatened or endangered under ORS 496.172(2), the design, construction and operation of the proposed facility, taking into account mitigation, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species.

As discussed above, Pattern has failed to complete current habitat surveys, mapping, and categorizations; literature reviews; and field surveys for wildlife and plants In addition, Pattern has substantially weakened its proposed mitigation measures and has failed to take into account the latest science and technologies for avoidance and mitigation of impacts. Pattern has also failed to demonstrate consultation with and approval by ODFW, under current standards and conditions, of the project's impacts and proposed mitigation measures. As a result of these failures, it is impossible for the Council to conclude that the design, construction, and operation of the facility, taking into account mitigation, are consistent with OAR 345-022-0070. The requested third round of construction extensions should be denied.

b. Wasco County Rules

Pursuant to ORS 469.310, 469.503(4), and 469.504, as well as OAR 345-022-0030, Wasco County's land use rules apply to the Council's review of this project. This includes Wasco County's standards for commercial energy facilities, found at Wasco County Land Use and Development Ordinance ("LUDO") Chapter 19, as well as the conditional use review standards, found at Wasco County LUDO Chapter 5.

As will be explained below, Pattern has failed to demonstrate compliance with the natural resource/wildlife protection provisions of these rules, found at LUDO section 19.030, as well as the conditional use review standards at LUDO 5.020 and 5.030.

Section 19.030
Commercial Power Generating Facilities Review Processes & Approval Standards

* * *

/ / /

C. *General Standards - The following standards apply to energy facilities as outlined in Section A above, in addition to meeting the Conditional Use Standards listed in Chapter 5:*

5. *Natural Resource/Wildlife Protection - Taking into account mitigation, siting, design, construction and operation the energy facility will not cause significant adverse impact to important or significant natural resources identified in the Wasco County Comprehensive Plan, Wasco County Land Use and Development Ordinance or by any jurisdictional wildlife agency resource management plan adopted and in effect on the date the application is submitted. As appropriate, the permit holder agrees to implement monitoring and mitigation actions that Wasco County determines appropriate after consultation with the Oregon Department of Fish and Wildlife, or other jurisdictional wildlife or natural resource agency. Measures to reduce significant impacts may include, but are not limited to the following:*

This section requires protection of all "important or significant natural resources identified in the Wasco County Comprehensive Plan, Wasco County Land Use and Development Ordinance[,] or by any jurisdictional wildlife agency resource management plan adopted and in effect on the date the application is submitted." The reference to "any jurisdictional wildlife agency resource management plan" includes all federal wildlife plans, such as the following plans:

- Final Eagle Incidental Take and Eagle Nest Take Regulations (USFWS, 2016)
- Record of Decision for the Final Programmatic Environmental Impact Statement for the Eagle Rule Revision (USFWS, 2016)
- Programmatic Environmental Impact Statement for the Eagle Rule Revision (USFWS, 2016)
- Bald and Golden Eagles: Population demographics and estimation of sustainable take in the United States, 2016 update (USFWS, 2016)
- Final Rule, Revised List of Migratory Birds (USFWS, 2013)[7]
- Memorandum of Understanding Between the U.S. Department of Energy and U.S. Fish & Wildlife Service Regarding Implementation of Executive Order 13186, "Responsibilities of Federal Agencies to Protect Migratory Birds" (USFWS & USDOE, 2013)
- Birds of Conservation Concern 2008 (USFWS, 2008)
- National Bald Eagle Management Guidelines (USFWS, 2007)

Thus, pursuant to Wasco County LUDO § 19.030.C.5, Pattern is required to demonstrate that the project will not cause significant adverse impact to bald eagles, golden eagles, federally designated migratory birds, and federal birds of conservation concern. Pattern has failed to identify all such bird species in its application, and to the contrary, has removed federal birds of

[7] The U.S. Fish and Wildlife Service is currently proposing to revise its list of migratory birds. However, Pattern's Request for Amendment 4 is subject to the 2013 version of the list, which was "in effect on the date [Pattern's] application [was] submitted." Wasco County LUDO § 19.030.C.5.

conservation concern that were previously identified in prior applications by Pattern's predecessor. Pattern is also failing to demonstrate that it will follow the recommendations of the U.S. Fish and Wildlife Service for the protection of bald eagles and golden eagles.

Because Pattern has failed to identify, survey for, and demonstrate the protection of bald eagles, golden eagles, federally designated migratory birds, and federal birds of conservation concern, Pattern is in violation of Wasco County LUDO § 19.030.C.5, and its Request for Amendment 4 must be denied.

> *a. Providing information pertaining to the energy facility's potential impacts and measures to avoid impacts on:*
>
> *(1) Wildlife (all potential species of reasonable concern);*
> *(2) Wildlife Habitat;*
> *(3) Endangered Plants; and*
> *(4) Wetlands & Other Water Resources.*

This provision in pertinent part requires Pattern to demonstrate the protection of wildlife ("all potential species of reasonable concern"[8]), wildlife habitat, and endangered plants. Yet, in the same ways as explained above with respect to the Council's rules, Pattern has failed to provide sufficient information to demonstrate that these natural resources will be protected. For example, Pattern is failing to identify the presence and distribution of all potentially affected wildlife and plant species. Pattern is also failing to demonstrate that it will follow the recommendations of the U.S. Fish and Wildlife Service for the protection of bald eagles and golden eagles. Pattern is in violation of Wasco County LUDO § 19.030.C.5.a.

> *b. Conducting biologically appropriate baseline surveys in the areas affected by the proposed energy facility to determine natural resources present and patterns of habitat use.*

As discussed above with respect to the Council's rules, Pattern has failed to conduct any updated baseline surveys for wildlife and plant species and habitat. Because current baseline surveys have not been made available, it is impossible "to determine natural resources present." Nor has Pattern shown the "patterns of habitat use," as required by this rule. The requirement to supply these baseline surveys is mandatory, and cannot be waived or deferred. *See* Wasco County LUDO § 19.030.A.2 (allowing for "tentative approval" and deferral of "the wildlife plan and all its required baseline studies" until "final approval," but stating that "[f]or facilities sited through EFSC, this section does not apply."). Pattern is in violation of Wasco County LUDO § 19.030.C.5.b.

> *c. Selecting locations to reduce the likelihood of significant adverse impacts on natural resources based on expert analysis of baseline data.*

[8] "All potential species of reasonable concern" includes bald eagles, golden eagles, federally designated migratory birds, and federal birds of conservation concern. *See also* Wasco County LUDO § 19.030.C.5.

Because there are no current baseline surveys or data, it is impossible for expert analysis to occur, and likewise impossible to "[s]elect locations to reduce the likelihood of significant adverse impacts on natural resources." Because Pattern has failed to provide this required information, the Council and the reviewing public do not know where wildlife and plant species and habitat are currently located in the project vicinity, and thus which locations should be focused on for reducing or avoiding impacts. Pattern is in violation of Wasco County LUDO § 19.030.C.5.c.

> *h. Avoiding construction activities near raptor nesting locations during sensitive breeding periods and using appropriate no construction buffers around known nest sites.*

Because Pattern has failed to update the prior raptor nest surveys, Pattern has failed to demonstrate compliance with this requirement. Pattern must update and disclose the raptor nest surveys, so that the Council and the reviewing public will be able to review that information and evaluate compliance. Pattern is in violation of Wasco County LUDO § 19.030.C.5.h.

> *Section 5.020*
> *Authorization to Grant or Deny Conditional Uses, and Standards and Criteria Used*
>
> *Conditional uses listed in this Ordinance shall be permitted, enlarged or otherwise altered or denied upon authorization by Administrative Action in accordance with the procedures set forth in Chapter 2 of this Ordinance. In judging whether or not a conditional use proposal shall be approved or denied, the Administrative Authority shall weigh the proposal's appropriateness and desirability or the public convenience or necessity to be served against any adverse conditions that would result from authorizing the particular development at the location proposed, and to approve such use, shall find that the following criteria are either met, can be met by observance of conditions, or are not applicable.*
>
> *A. The proposal is consistent with the goals and objectives of the Comprehensive Plan and implementing Ordinances of the County.*
>
> * * *
>
> *F. The proposed use will not significantly reduce or impair sensitive wildlife habitat, riparian vegetation along streambanks and will not subject areas to excessive soil erosion.*

Because Pattern has failed to complete current wildlife and habitat surveys, categorizations, and mapping, it is impossible to evaluate current compliance with section 5.020 of the Wasco County LUDO. Pattern has failed to demonstrate that the proposal is consistent with the Wasco County land use rules, that the proposal will not significantly reduce or impair sensitive wildlife habitat or riparian vegetation along streambanks, and that the proposal will not subject areas to excessive soil erosion. The need to update the baseline data and maps is

especially important given the recent wildfires in the project area. Because Pattern is in violation of Wasco County LUDO section 5.020, the Request for Amendment 4 should be denied.

> *Section 5.030*
> *Conditions*
>
> *Such reasonable conditions as are necessary to ensure the compatibility of a conditional use to surrounding permitted uses as are necessary to fulfill the general and specific purposes of this Ordinance may be imposed in approving an application, pursuant to Section 2.110(D). Such conditions may include, but are not limited to, the following:*
>
> *A. Limiting the manner in which the use is conducted including restricting the time an activity may take place and restraints to minimize such environmental effects as noise, vibration, air pollution, glare, and odor.*
>
> *B. Establishing a special yard or other open space or lot area or dimension.*
>
> *C. Limiting the height, size, or location of a building or other structure.*
>
> *D. Designating the size, number, location, and nature of vehicle access points.*
>
> *E. Increasing the amount of street dedication, roadway width or improvements within the street right of way.*
>
> *F. Limiting or otherwise designating the number, size, location, height and lighting of signs.*
>
> *G. Limiting the location and intensity of outdoor lighting and requiring its shielding.*
>
> *H. Requiring diking, screening, landscaping or another facility to protect adjacent or nearby property and designating standards for its installation and maintenance.*
>
> *I. Designating the size, height, location and materials for a fence.*
>
> *J. Protecting and preserving existing trees, vegetation, water resources, wildlife habitat or other significant natural, historic, or cultural resources.*
>
> *K. Other conditions to permit the development of the County in conformity with the intent and purpose of the conditional classification of uses.*

As discussed above, Pattern has failed to update its plant, wildlife, and habitat surveys, and has also failed to disclose and evaluate the best available current science and technologies for avoiding and reducing impacts. Pattern has failed to do so despite the likely changes in conditions at the site caused by the 2018 wildfires. Without this required information, it will be impossible for the Council to craft and adopt appropriate conditions of approval to "minimize . . . environmental effects," "protect[] and preserv[e] existing trees, vegetation, water resources,

[and] wildlife habitat," and otherwise ensure compliance with section 5.030 of the Wasco County LUDO. Accordingly, the Request for Amendment 4 should be denied.

4. The Council must be provided with, and must consider, *all* written comments received on the record of the hearing before taking any action.

The Council's rules state in pertinent part that "the Council . . . shall consider *all* comments received on the record of the hearing" (emphasis added). OAR 345-027-0067(7); *see also* OAR 345-027-0071(1) (referencing the Council's duty to "consider[] *all* comments received on the record of the public hearing under [OAR] 345-027-0067") (emphasis added). The Council will not be able to fulfill its mandatory duty to "consider all comments" until it receives copies of *all* written comments received on the record of the hearing.

It appears that the Council has not yet been furnished with copies of all written comments received on the record of the hearing. On February 20, 2019, the Department posted to the EFSC website a statement that 892 comments had been received, along with a draft index of 323 of those comments and a statement that some of the comments are "identical" or "contain similar content." Finally, copies of approximately 28 of the 892 comments received as of February 20, 2019 were posted along with the Department's statement and index.

Thus, it appears that, as of February 20, 2019, only about 3.1% of the 892 comments received at that point had been shared with the Council. In particular, the Department has apparently not provided the Council with copies of purportedly "identical" comments. Nor has the Department posted or provided the Council with any of the names, addresses, or any other identifying information for the persons or entities who submitted these purportedly identical comments.

In order to "consider all comments," as required by OAR 345-027-0067(7) and 345-027-0071(1), the Council must be provided with copies of "all" written comments, even if the text of multiple comments from different persons or entities are purportedly identical. Until it is provided with copies of all comments, the Council will have no knowledge of who made the comments, where the commenters reside, whether each comment is submitted on behalf of multiple people (*e.g.*, a husband and wife), or whether each comment is submitted on behalf of any entities. The identities, locations, and any affiliations of the commenters is vital information that must be provided to the Council for its consideration. For example, a Council member may personally know one or more of the commenters, or know of a commenter, and thus may have knowledge of that person's credibility (or lack of credibility).

The Staff Report fails to state any reason—let alone any compelling reason—why these comments have apparently been withheld from the Council to date. All comments must be provided to the Council, both because it is required by the Council's own rules, and also because each commenter has rights under the federal and state constitutions to due process and to petition the government for a redress of their grievances.

The Department must provide the Council with copies of all written comments received. In addition, the agencies should explain the anticipated process and timeline by which the

Department will do so, and by which Council will conclude its consideration of all comments pursuant to OAR 345-027-0067(7) and 345-027-0071(1). Not until the Council has "considered all comments" will the procedures and timeline for the Department to issue a Proposed Order begin. OAR 345-027-0071(1).

Finally, the agenda for the February 22, 2019 Council meeting shows an "Action Item" for Council action on this Request for Amendment immediately following the public hearing, and the Staff Report states that "[t]he Department recommends Council direct staff to issue the Proposed Order." It is unclear why this is listed as an action item. In contrast, prior matters in similar postures, such as the Wheatridge Wind Energy Facility (heard by the Council on October 26, 2018) and the Golden Hills Wind Project (heard by the Council on August 24, 2018), were listed on the meeting agendas as information items, rather than action items. The Department and the Council have failed to explain why they apparently intend to process the Summit Ridge matter differently.

Moreover, a vote by the Council directing the Department to issue the Proposed Order is unnecessary and potentially inconsistent with OAR 345-027-0071(1), which governs the process for the issuance of the Proposed Order and which requires the Department to issue it within a specific timeline.

Finally, if the Council *were* to take action directing the Department to issue the Proposed Order before the Council considers "all comments" submitted by the public, such an action would be in violation of OAR 345-027-0067(7) and 345-027-0071(1). The Council should not act prematurely, and should not prejudge, nor imply any prejudgment of, this matter. Even assuming for the sake of argument that it would be appropriate for the Council to direct the Department to issue the Proposed Order, it would need to wait to do so until after the Council completes its consideration of "all comments." OAR 345-027-0067(7), 345-027-0071(1).

5. Conclusion

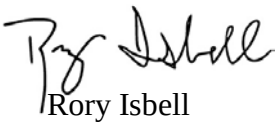
For these and other reasons, the Council should deny Request for Amendment 4, including the requested third round of extensions of the construction deadlines. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its delays in proceeding with this project and its failures to disclose and address the project's current impacts. Please deny the Request for Amendment 4.

Sincerely,

Nathan Baker
Senior Staff Attorney
Friends of the Columbia Gorge

Doug Heiken
Conservation and Restoration Coordinator
Oregon Wild

Dan Morse
Conservation Director
Oregon Natural Desert Association



Rory Isbell
Staff Attorney
Central Oregon LandWatch

Bob Sallinger
Director of Conservation
Audubon Society of Portland

Tom Lawler
President
East Cascades Audubon Society

EXHIBIT A

U.S. Fish & Wildlife Service
Letter to Oregon Dept. of Energy
(Sept. 20, 2010)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Bend Field Office
20310 Empire Ave, Ste A-100
Bend, Oregon 97701
Phone: (541) 383-7146 FAX: (541) 383-76381

Reply To: 6320.0010(10)
File Name: 2010 EFSC ASC Summit Ridge Cmts 09202010
TS Number: 10-1494
TAILS: 13420-2009-FA-0217

September 20, 2010

Sue Oliver
Energy Facility Siting Officer
Oregon Department of Energy
245 Main Street, Suite C
Hermiston, OR. 97838

Subject: Request for Comments on the Application for Site Certificate for the proposed Summit Ridge Wind project, Wasco County, Oregon

Dear Ms. Oliver:

The Fish and Wildlife Service (Service) has reviewed the August 24, 2010, Application for a Site Certificate (ASC) for the proposed Summit Ridge Wind Project (Project) to be located in Wasco County, Oregon. The proposed Project will include up to 87 wind turbines (2.0 to 3.0 MW each) with a total nominal generating capacity of approximately 200 MW of electricity. The Project will include about 19 miles of new access roads, turbine foundations, underground and overhead electrical collection systems, meteorological towers, and an operations and maintenance building. The Project will also include a communications system, a substation, and interconnection facilities to tie into the transmission line, located to the west of the project. The transmission feeder line will be an overhead 230 kV (kilovolt) line and will be approximately eight miles long.

Much of the project site is agricultural land used for dry land winter wheat production. The proposed facility would be built on land one to four miles west of the Deschutes River Canyon extending from approximately river mile 7 on the north end of the project boundary to river mile 31 on the south end. The Service supports the use of disturbed habitats for the placement of wind energy generation. However, we remain concerned regarding short and long-term Project impacts to migratory birds including bald and golden eagles, and bats.

The Service supports renewable energy and the economic benefits that wind energy generation brings to local communities. We also recognize wind power development has the potential to impact wildlife and habitat resources. The Service provided comments on the Notice of Intent to Apply for an Energy Facility Site Certificate (NOI) for the Project in a letter dated July 13, 2009, and Preliminary ASC in a letter dated November 18, 2009. We appreciate the opportunity to

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provide additional comments, and we look forward to working with you and LotusWorks on this important project.

Our previous comment letters focused on: (1) the potential for project specific mortality to birds and bats, including cumulative impacts of wind energy projects within the Columbia River corridor; and (2) measures to avoid or minimize Project impacts and adequate mitigation to offset unavoidable project impacts to biological resources. The Service subsequently received information in an email on June 24, 2010, from LotusWorks documenting the presence of golden eagles, large stick nests, and bald eagles in the project vicinity. Our comments below will focus on project impacts to bald and golden eagles and other migratory birds. We refer you to our previous two letters referenced above regarding other issues of concern.

Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act

The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, and transportation, (among other actions) of migratory birds, their eggs, and nests except when specifically permitted by regulations. While the MBTA has no provision for allowing unauthorized take, the Service realizes that some birds may be killed during specific wind project operations even if all known reasonable, effective measures to protect birds are implemented. The Service's Office of Law Enforcement (OLE) carries out its mission to protect migratory birds through investigations and enforcement as well as by fostering relationships with individuals, companies, and industries that have taken effective steps to avoid take of migratory birds. It is not possible to absolve individuals, companies, or agencies from liability even if they implement bird mortality avoidance or other similar protective measures. However, the OLE focuses its resources on investigating and prosecuting individuals and companies that take migratory birds without identifying and implementing all reasonable, prudent and effective measures to avoid that take.

Additionally, the Bald and Golden Eagle Protection Act (BGEPA) prohibits the taking of golden and bald eagles except when specifically authorized by the Department of the Interior (16 U.S.C. 668-668d). The Service has new regulations (Federal Register 74:46836-46879; 11 September 2009) (USFWS 2009) that may eventually allow a wind project to receive a permit to take golden or bald eagles under the BGEPA (50 CFR 22.26), for programmatic actions that are consistent with the goal of stable or increasing eagle breeding populations. Therefore, we encourage LotusWorks to work closely with the Service to identify available protective measures and develop an Avian and Bat Protection Plan (ABPP) and implement those measures prior to and during Project construction and operation.

The Service's goal for golden and bald eagles is stable or increasing breeding populations. Data from long-term studies of golden eagle migration, population models, and surveys sponsored by the Service indicate cause to be concerned about population trends for golden eagle (Millsap and Allen 2006, Good et al. 2007, Farmer et al. 2008, Smith et al. 2008, USFWS 2009). The Service was sufficiently concerned regarding the status of golden eagles that we determined, until further data shows golden eagle populations can withstand additional take, we will only consider BGEPA permit issuance of new golden eagle take for safety emergencies and for projects that

result in net benefits to golden eagles. Bald eagle permit issuance criteria would limit permits to only 5% of the Maximum Sustainable Yield.

Project Impacts and Service Recommendation

Golden eagles and other bird species are known to collide with wind turbines and transmission lines. Studies for the Project document the presence of golden eagles (12 detections) and three inactive large stick nests that were likely golden eagle nests, with a fourth nest that may have been built by golden eagles. These nests were located within 1,000 to 10,000 feet from Project wind turbines (Northwest Wildlife Consultants, Inc. 2010). Additionally, adult bald eagles were observed (4 detections) on or in proximity to the Project. The Service is concerned regarding the potential for injury or mortality from a turbine strike, transmission line collision, or other Project-related disturbance to bald and golden eagles. The Project studies and reports provide only a limited eagle impact analysis.

With the expected growth of the wind industry in the western United States, the Service anticipates that the number of golden eagles killed annually will multiply. The Service is concerned that the population trend of golden eagle will drop even more rapidly as a result of collisions with wind turbines, resulting in greater conflicts between renewable energy industry and agencies. Ultimately, fewer golden eagles will exist unless we find solutions to either greatly reduce golden eagle mortalities at wind projects, reduce other sources of mortality to off-set losses of golden eagles from wind farms, or enhance golden eagle populations with habitat or other reforms.

In the absence of clear solutions to address golden eagle mortalities at wind energy projects, to enhance populations through conservation measures, or to off-set losses in other ways, our best efforts should be directed at avoidance of mortalities by siting wind turbines well away from areas where resident and migrating eagles are known to concentrate their activities. The Service believes the Project, including all turbines, transmission and roads, and associated facilities has the potential to result in injury and mortality of individual golden eagles and potential loss of nest sites over the life of the Project.

The Service recommends that LotusWorks prepare an Avian and Bat Protection Plan consistent with the Service "white paper" titled *Consideration for Avian and Bat Protection Plans* (FWS 2010) that addresses bald and golden eagles, other migratory bird species of concern, and bats. We recommend that the Oregon Department of Energy defer the approval of the Project site certificate until an Avian and Bat Protection Plan is completed, and available for review. We further recommend the following measures be incorporated into any site certificate approval:

To reduce the likelihood of golden eagle take and to minimize Project impacts, we recommend the following measures be included in the development of the Project:

1. Minimize the potential for resident golden eagle collisions by locating individual Project wind turbines a sufficient distance from golden eagle nest sites. Based on the best information available to us, a radius of a minimum of six miles from a golden eagle nest to the nearest turbine will likely avoid take of adult golden eagles associated with that nest. Any wind turbines proposed closer than six miles to golden eagle nests should not

be constructed until specific golden eagle studies have been implemented that define areas where no golden eagle use occurs (see studies in #2, below). These golden eagle-specific data should then be integrated into a protective turbine location "micrositing" design where turbines within six miles of a golden eagle nest are only sited in areas determined to be golden eagle non-use locations;

2. Conduct site specific studies to help define areas of use and non-use by golden eagles including:

    - Complete nest surveys within six miles of the Project location;
    - Conduct observation-post studies to observe the behavior of the adults (if present) without disturbing nesting behavior. These studies collect information on territory occupancy, productivity, fledging success, foraging and winter habitat and other information per the Interim Golden Eagle Inventory and Monitoring Protocols (Pagel et al. 2010); and
    - Satellite telemetry of nesting golden eagles within six miles of Project location.

3. Develop a Project construction plan that fully integrates avoidance of golden eagle disturbance during construction activities by implementing concurrent protective timing windows and distance buffers during sensitive nesting and fledging activities.

    - Distance and timing: Construction and maintenance activities between January 1 and July 15 should not be conducted within 1 mile of an active golden eagle nest (or ½ mile if not line-of-sight), unless site specific surveys indicate otherwise.

The Service has regulations in place that allow us to issue 'Programmatic Permits' to project applicants whose developments have the potential to incidentally 'take' golden eagles over extended periods of time. The Service is not currently issuing those permits, but is developing conditions that will likely be components of them. Permit conditions will likely include, appropriate Advanced Conservation Practices - measures that represent the best available techniques to reduce take to a level where additional take is unavoidable: and permit conditions will also likely include mitigation measures to offset whatever birds are taken so that the effect of the Project on eagles will be consistent with the Service's goal of stable or increasing breeding populations. It is possible that a programmatic permit issued by the Service when it becomes available, would include as permit conditions many of the recommendations for monitoring, adaptive management and conservation actions described below:

1. Develop and implement a golden eagle monitoring plan (including monitoring of Project-related golden eagle mortality, golden eagle territory occupancy, nest success, and productivity) over the life of the Project to ensure all golden eagles injured or killed by wind turbines or other impacts to golden eagles are immediately identified and reported.

2. Develop and implement an adaptive management plan to address new information that is obtained during operation of the Project, including all turbines, transmission, and roads, and connected wind projects that effectively address any identified problems.

- Utilize turbine feathering and cut-in speeds of 5 m/sec to 6 m/sec at times of low wind speed to reduce bird (and bat) fatalities;
- Lock rotors during daytime and at night during peak migration periods and peak presence of migrating birds and bats;
- Specific commitment to integrate turbine operation curtailment (seasonally or permanently) into Project management to minimize impacts to bald and golden eagles;
- Specific commitment to remove turbines if they are found to cause repeated mortalities of golden or bald eagles;
- Experimental procedures (e.g. blade painting for higher visibility);
- Minimize lighting associated with the Project including:
    a) FAA visibility lighting of wind turbines should employ only strobed, strobe-like, or blinking incandescent lights, preferably with all lights illuminating simultaneously; and
    b) Keep lighting at both operation and maintenance facilities and substations located within ½ mile of the turbines to a minimum level by using motion or infrared light sensors and switches to keep lights off when not required, shield operation lights downward, and do not use high intensity, steady burning, bright lights; and
- Commitment to implement future technology when available.

Additionally, specific conservation actions should be collaboratively developed with the Service to meet the conservation goal of stable or increasing breeding populations of golden and bald eagles. The Service cannot permit take of golden eagles; however were we able to, we would look for the types of measures identified below to potentially offset such take in a manner that is consistent with the goal of stable or increasing breeding populations of golden eagles. The local-area eagle population of concern in this case is the area encompassed by a circle 140 miles from the Project boundary, by definition (USFWS 2009). This is the area within which we would expect evaluations of the effects of this Project on eagles would take place. The following should guide any collaborative development of proposed conservation measures:

- Ensure no net loss or an increase in golden eagles in the local-area population via:
    - Land acquisitions or easement purchases;
    - Nest site protection;
    - Habitat enhancement via:
        - Restoration projects (e.g. juniper removal in shrub-steppe systems that will enhance prey base);
        - Grassland restoration efforts with native grasslands;
        - Cheatgrass control programs;
        - Nest platforms;
        - Nest enhancements;
    - Reduce electrocution mortality via partnering with utilities to implement Avian Power Line Interaction Committee standard (APLIC 2006) retrofits of problem distribution lines;
    - Reduce losses to lead poisoning via:
        - Education program on lead poisoning;

- Raptor rehabilitation centers;
- Contribute to regional or population-wide monitoring and research on golden eagles and wind turbines to better inform management across the West.

Conclusion

The Service appreciates the opportunity to comment on the ASC for the Summit Ridge Wind Project. We support well-designed wind projects that are carefully sited on habitats that will result in less impacts to Service trust resources. We recommend that the Oregon Department of Energy defer the approval of the Project site certificate until an Avian and Bat Protection Plan is completed, and available for review. We further recommend the measures outlined in this letter be incorporated into any site certificate approval. The Service is available to continue to work with LotusWorks in the review, development, mitigation, and monitoring of the Project.

If you have any questions regarding the Service's comments or desire to meet with us to discuss these issues further, please contact Jerry Cordova or me at (541) 383-7146.

Sincerely,

Nancy Gilbert

Nancy Gilbert
Field Supervisor

cc:
Steve Cherry, Oregon Department of Fish and Wildlife, Heppner, Oregon
Chris Carey, Oregon Department of Fish and Wildlife, Bend, Oregon
Mike Green, US Fish and Wildlife Service, Migratory Birds, Portland, Oregon
Doug Young, US Fish and Wildlife Service, Oregon Fish and Wildlife Office, Portland, Oregon
Robert Romero, US Fish and Wildlife Service, R1 Law Enforcement, Oregon

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Northwest Wildlife Consultants, Inc. (NWC) 2010. Summit Ridge Wind Project Wildlife Monitoring and Mitigation Plan, Summit Ridge Wind Power Project. March 30, 2010. Pendleton, OR. and Goldendale, WA. 9 pages.

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From: Nathan Baker
Sent: Thursday, February 21, 2019 9:38 PM
To: MAY Luke * ODOE
Cc: 'Gary Kahn'; HEIKEN Doug; Dan Morse; Rory Isbell; SALLINGER Bob; Tom Lawler; dyann.blaine@patternenergy.com
Subject: RE: Summit Ridge Wind Farm – Request for Amendment 4
Attachments: Smallwood comments on Summit Ridge_022119 - Errata Sheet.pdf

To Whom It May Concern:

Please find attached an errata sheet for the previously submitted comments of Shawn Smallwood.

Thank you for your time and consideration.

Nathan Baker, Senior Staff Attorney
Friends of the Columbia Gorge
nathan@gorgefriends.org
333 SW 5th Ave., Suite 300
Portland, OR 97204-1717
(503) 241-3762 x101

ERRATA SHEET

The following correction applies to the comments of Shawn Smallwood, PhD (21 February 2019):

1. On page 33, Table 3, the table heading “Predicted fatalities/MW/year” is corrected to read “Predicted fatalities/year.”

MAY Luke * ODOE

From: Nathan Baker <Nathan@gorgefriends.org>
Sent: Thursday, February 21, 2019 9:48 PM
To: MAY Luke * ODOE
Cc: 'Gary Kahn'; HEIKEN Doug; Dan Morse; Rory Isbell; SALLINGER Bob; Tom Lawler; dyann.blaine@patternenergy.com
Subject: Summit Ridge Wind Farm – Request for Amendment 4
Attachments: Smallwood comments on Summit Ridge_022119 - Final Errata Sheet.pdf

To Whom It May Concern:

Please find attached a final errata sheet for the previously submitted comments of Shawn Smallwood.

Thank you for your time and consideration.

Nathan Baker, Senior Staff Attorney
Friends of the Columbia Gorge
nathan@gorgefriends.org
333 SW 5th Ave., Suite 300
Portland, OR 97204-1717
(503) 241-3762 x101

ERRATA SHEET

The following corrections apply to the comments of Shawn Smallwood, PhD (21 February 2019):

1. On page 32, Table 2, the table heading “Predicted fatalities/MW/year” is corrected to read “Predicted fatalities/year.”
2. On page 33, Table 3, the table heading “Predicted fatalities/MW/year” is corrected to read “Predicted fatalities/year.”

From: Matthew Barmann
Sent: Thursday, February 21, 2019 9:51 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Matthew Barmann
417 17th Street
Hood River, OR 97031

February 22, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Matthew Barmann

From: Judy Jordan
Sent: Thursday, February 21, 2019 10:32 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Judy Jordan
7067 SE Clinton St.
Portland, OR 97206

February 21, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

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Sincerely,
Judy Jordan

From: John Nelson
Sent: Thursday, February 21, 2019 1:59 PM
To: MAY Luke * ODOE
Subject: Summit Ridge Wind Farm - Request for Amendment 4
a
February 21, 2019

Oregon Energy Facility Siting Council
c/o Luke May, Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301
luke.may@oregon.gov

Re: Summit Ridge Wind Farm – Request for Amendment 4

Dear Chair Beyeler and Members of the Council:

My name is John Nelson and I live in The Dalles, Oregon. I previously submitted written comments by email to the Council regarding the Summit Ridge project and the request to extend the construction deadlines. I understand that my prior comments have not been shared with the Council members, because the agency staff have deemed my comments to be "identical" to comments submitted by other persons.

I would like to point out that the Council is required to "consider **all** comments received on the record of the hearing." This is required by OAR 345-027-0067(7) and 345-027-0071(1). How can the Council be said to have considered **all** comments received, if it doesn't receive copies of all comments in the first place? How will the Council even know that I commented?

I also have rights under the federal and state constitutions to due process, and to petition the government for a redress of my grievances. I am a real person with real concerns about this project. I am not merely a number or statistic. My comments need to be shared with the Council members, even if my comments are deemed by staff to be "identical" comments.

In conclusion, I request that copies of my prior comments, as well as all comments received by other persons, be provided to the Council. Only then will the Council be able to "consider all comments received," as required by the rules. And only after the Council considers all comments should the next steps in the process proceed.

Thank you for considering my comments.

John Nelson
The Dalles, Oregon

From: amber.elizabeth38@everyactioncustom.com on behalf of Amber Davidson <amber.elizabeth38@everyactioncustom.com>
Sent: Thursday, February 21, 2019 11:22 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs. Amber Davidson
1203 Dothan Rd Columbia, SC 29210-3947
amber.elizabeth38@gmail.com

From: tamara.j.smith@everyactioncustom.com on behalf of Tammy Smith <tamara.j.smith@everyactioncustom.com>
Sent: Thursday, February 21, 2019 2:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Tammy Smith
10148 NW Skyline Heights Dr Portland, OR 97229-2644 tamara.j.smith@intel.com

From: gypsywind55@everyactioncustom.com on behalf of Marilyn Costamagna <gypsywind55@everyactioncustom.com>
Sent: Thursday, February 21, 2019 2:21 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
ms Marilyn Costamagna
2401 Acorn Way Medford, OR 97504-7701
gypsywind55@gmail.com

From: dmerchant@everyactioncustom.com on behalf of Deb Merchant <dmerchant@everyactioncustom.com>
Sent: Thursday, February 21, 2019 2:28 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

Wildlife, water and land should never come at the expense of our needs for energy! Let's use our intellect to create our energy needs and let Eagles soar.

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

In the name of soaring Eagles!

Sincerely,
Ms. Deb Merchant
1882 NW Park Ter Albany, OR 97321-1264
dmerchant@me.com

From: eubieblake05@everyactioncustom.com on behalf of Sandra Mann <eubieblake05@everyactioncustom.com>
Sent: Thursday, February 21, 2019 2:53 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Sandra Mann
2120 W 15th Ct Eugene, OR 97402-3410
eubieblake05@gmail.com

From: dodo195784@everyactioncustom.com on behalf of Dominique LANG <dodo195784@everyactioncustom.com>
Sent: Thursday, February 21, 2019 3:25 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Miss Dominique LANG
2150 B Traverse Dorange Salt Lake City, UT 84110 dodo195784@gmail.com

From: acynk@everyactioncustom.com on behalf of Ann Marie Sardineer <acynk@everyactioncustom.com>
Sent: Thursday, February 21, 2019 3:41 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs Ann Marie Sardineer
233 Woodlawn Dr Trafford, PA 15085-1232 acynk@yahoo.com

From: creativekiwi@everyactioncustom.com on behalf of Diane Craig <creativekiwi@everyactioncustom.com>
Sent: Thursday, February 21, 2019 4:23 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs Diane Craig
8525 SW Davies Rd Beaverton, OR 97008-6893 creativekiwi@comcast.net

From: gailah1@everyactioncustom.com on behalf of Gail Harris <gailah1@everyactioncustom.com>
Sent: Thursday, February 21, 2019 4:53 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Gail Harris
4795 Brookwood St Eugene, OR 97405-4832 gailah1@comcast.net

From: jsmbh032@everyactioncustom.com on behalf of Joanna Hardeman <jsmbh032@everyactioncustom.com>
Sent: Thursday, February 21, 2019 5:35 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Joanna Hardeman
MAIN St Hollywood, FL 33025
jsmbh032@gmail.com

From: jrd1776@everyactioncustom.com on behalf of JR DuBois <jrd1776@everyactioncustom.com>
Sent: Thursday, February 21, 2019 7:33 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms JR DuBois
4065 Jefferson Pkwy Lake Oswego, OR 97035-1478 jrd1776@gmail.com

From: alberodolfito@everyactioncustom.com on behalf of Albeniz Perez <alberodolfito@everyactioncustom.com>
Sent: Thursday, February 21, 2019 7:40 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mr. Albeniz Perez
308 W Main St Alliance, OH 44601-2317
alberodolfito@gmail.com

From: recordsandjunksh@everyactioncustom.com on behalf of Susan H <recordsandjunksh@everyactioncustom.com>
Sent: Thursday, February 21, 2019 8:43 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms. Susan H
PO Box 537 Newport, OR 97365-0037
recordsandjunksh@gmail.com

From: corine.cathala@everyactioncustom.com on behalf of corine cathala <corine.cathala@everyactioncustom.com>
Sent: Thursday, February 21, 2019 8:57 PM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. corine cathala
Wall House Schenectady, NY 26700
corine.cathala@hotmail.fr

From: [redacted]rhea@everyactioncustom.com on behalf of Rhea Shapiro <rhea@everyactioncustom.com>
Sent: [redacted]Friday, February 22, 2019 6:29 AM
To: [redacted]MAY Luke * ODOE
Subject: [redacted]Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

THIS PROJECT NEEDS UPDATING.... IF THE DEVELOPER WAITED THIS LONG THEY NEED TO USE UPDATED INFORMATION AND TECHNOLOGY TO PROTECT WILDLIFE: EAGLES! AND PLEASE ALSO PROTECT THE SCENIC VIEWS OF OUR AMAZING OREGON RIVERS. DON'T LET THEM JUST SLIP THROUGH.... THANX, R. SHAPER
I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms Rhea Shapiro
1624 NW 28th Ave Portland, OR 97210-2477 rhea@igc.org

From: kimczwicker@everyactioncustom.com on behalf of Kim Zwicker <kimczwicker@everyactioncustom.com>
Sent: Thursday, February 21, 2019 11:10 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Kim Zwicker
50 S Common St Apt 210 Lynn, MA 01902-4448 kimczwicker@yahoo.com

From: Fuji Kreider
Sent: Thursday, February 21, 2019 4:00 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Fuji Kreider
60366 Marvin Rd
La Grande, OR 97850

February 21, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

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Sincerely,
Fuji Kreider

From: P. Sydney Herbert
Sent: Thursday, February 21, 2019 7:11 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

P. Sydney Herbert
5125 SW DOSCH RD
PORTLAND, OR 97239

February 21, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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Sincerely,
P. Sydney Herbert

From: David Williams <willyd11@hotmail.com>
Sent: Thursday, February 21, 2019 8:41 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

David Williams
4613 E 18th St
Vancouver, WA 98661

February 21, 2019

Dear Chair Beyeler and Members of the Council,

The Summit Ridge Wind Farm in Wasco County has not been built, though first proposed nearly ten years ago. The project threatens environmental impacts to bald and golden eagles along the lower Deschutes River, and scenic impacts to the Columbia River Gorge National Scenic Area and other nearby recreational areas. When the project was first proposed, numerous eagles and eagle nests were discovered near the project site, and the U.S. Fish and Wildlife Service (USFWS) recommended a six-mile buffer between the project's wind turbines and eagle nests. The project developer has not updated the project's potential impacts to eagles, yet is now asking for a two-year extension of the deadline to start construction.

While I support the responsible development of renewable energy alternatives, I do not support any developments that threaten the resources of the Columbia River Gorge National Scenic Area, or unnecessary developments that pose an unacceptable risk to wildlife or the natural environment.

If Summit Ridge wants to build the project after stalling for ten years, this old and outdated proposal should be scrapped this old and a new application submitted that avoids impacts to eagles, other wildlife, and scenic views.

Sincerely,
David Williams

From: John Wood
Sent: Thursday, February 21, 2019 8:41 PM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

John Wood
POB 1662
Hood River, OR 97031

February 21, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

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To: MAY Luke * ODOE
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4613 E 18th St
Vancouver, WA 98661

February 21, 2019

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Sincerely,
David Williams

From: wendyjane25@everyactioncustom.com on behalf of Wendy Forster <wendyjane25@everyactioncustom.com>
Sent: Friday, February 22, 2019 8:01 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Mrs. Wendy Forster
S FARM GRANARY Schenectady, NY 12345-0001 wendyjane25@sky.com

From: ronnafriend@everyactioncustom.com on behalf of Ronna Friend <ronnafriend@everyactioncustom.com>
Sent: Friday, February 22, 2019 8:11 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

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Sincerely,
Ms Ronna Friend
2385 Madrona Dr Eugene, OR 97403-1894
ronnafriend@gmail.com

MAY Luke * ODOE

From: Peter Cornelison <peterc@gorge.net>
Sent: Friday, February 22, 2019 10:44 AM
To: MAY Luke * ODOE
Subject: Re: Summit Ridge Wind Farm - Request for Amendment 4

Peter Cornelison
1003 5th St.
Hood River, OR 97031

February 22, 2019

Dear Chair Beyeler and Members of the Council,

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

Moreover, the raptor survey data for this project is stale and outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds-such as radar technology for curtailing operations during migratory periods-has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

In addition, Pattern Energy submitted this request for a third extension under invalid rules. These rules are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules.

Moreover, even if Pattern's application could somehow be retroactively processed under the old rules for proposed amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited until three days before the deadline to submit its application and has failed to demonstrate good cause for its delay.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please don't reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,
Peter Cornelison

MAY Luke * ODOE

From: k.pasa_travel@everyactioncustom.com on behalf of Sandy Killen <k.pasa_travel@everyactioncustom.com>
Sent: Friday, February 22, 2019 9:43 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Ms. Sandy Killen
46 Sequoia Rd Fairfax, CA 94930-1540
k.pasa_travel@yahoo.com

MAY Luke * ODOE

From: Jim Kreider <jkreider@campblackdog.org>
Sent: Friday, February 22, 2019 8:10 AM
To: MAY Luke * ODOE
Cc: 'Fuji Kreider'; 'Jim Kreider'
Subject: Summit Ridge Wind Farm - Request for Amendment 4
Attachments: Summit Ridge - Kreider Comments - Fe 2019.docx

Dear Chair Beyeler and Members of the Council,

Attached are our comments on Summit Ridge Wind Farm – Request for Amendment 4. We need to start over. **F**

Oregon Energy Facility Siting Council
c/o Luke May, Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301
luke.may@oregon.gov

Re: Summit Ridge Wind Farm – Request for Amendment 4

Dear Chair Beyeler and Members of the Council:

We are writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice and the developer ownership has changed (in the 3rd Amended site certificate 12/15/17); the site certificate holder (Pattern Energy) now seeks yet another extension. Please deny Pattern's request to extend the deadlines a third time.

This ill-conceived project has never begun construction because it has struggled to find financing and has no market (no power-purchase agreement.) It has been more than nine years since the preliminary application was filed, and more than seven years since the project was originally approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet Pattern admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions (p. 2 of Preliminary Request for Amendment #4 application.)

In addition, and more applicable to the Council's standards, OAR 345-024-0010 and 345-024-0015, the **raptor survey** data for this project is stale and outdated; and, mitigation technology has changed. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform and disclose updated surveys. It is impossible for EFSC and the reviewing public to determine the true, current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

Procedurally, there are additional problems with Pattern's request. First, Pattern submitted this request for a third extension under invalid rules or rules that have not been confirmed by the Oregon courts. These rules that were used are currently being challenged by nine conservation organizations in the Oregon Supreme Court. The rules are invalid for a number of reasons, including because the rules were not adopted in compliance with the procedural requirements of the Oregon Administrative Procedures Act. Pattern should not be allowed to submit an application under these invalid rules and should have been directed to re-apply. However, even

if Pattern's application could somehow be retroactively be processed under the old rules for amendments to site certificates, those rules required Pattern to submit its application at least six months before the construction start deadline. Here, Pattern waited to submit its application until three days before the deadline, and has failed to demonstrate good cause for its delay. If lack of financing and market are their reasons for delay (for past 9 years), then the project is obviously ill-conceived from the beginning!

For these reasons: lack of financing; lack of adequate raptor surveys; and procedural errors, the requested third extension of the construction deadlines should be denied.

If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts and secure and adequate financing. Please do not reward Pattern for its failures to disclose the project's impacts and its delays in proceeding with this project. Please deny the requested third extension.

Sincerely,

Jim and C. Fuji Kreider
60366 Marvin Road
La Grande, OR 97850
jkreider@campblackdog.org
fkreider@campblackdog.org

MAY Luke * ODOE

From: kriggin@everyactioncustom.com on behalf of Koirna Riggin <kriggin@everyactioncustom.com>
Sent: Friday, February 22, 2019 9:41 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mrs Koirna Riggin
951 SW Silver Lake Blvd Bend, OR 97702-3665 kriggin@gmail.com

MAY Luke * ODOE

From: Carolyn and Wayne Stewart <candwstewart@q.com>
Sent: Friday, February 22, 2019 9:46 AM
To: MAY Luke * ODOE
Subject: Summit Ridge Project

Chairman Beyeler and Council Members,

Several days ago I sent in my comments regarding the Summit Ridge Wind Turbine Project. I now understand that my comments were not seen by the Council because the staff said that my comments were "identical" to the comments of others. Whether "identical" or not, they are my comments! I am very interested in this project, and as a citizen, I expect that my comments will be seen and considered by the Council.

I ask that my comments be submitted to the Council for consideration, along with any other comments that were excluded because they were considered "identical".

It is impossible for the Council to accurately consider this issue if the public's comments have been withheld. I believe that the public's voice must be heard and accurately represented in any process of public interest.

Thank You,
Carolyn Stewart

Sent from my iPad

MAY Luke * ODOE

From: wilkslumper@everyactioncustom.com on behalf of Bruce Lumper <wilkslumper@everyactioncustom.com>
Sent: Friday, February 22, 2019 10:10 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. Even though the construction deadlines for this project have already been extended twice, the developer (Pattern Development) now seeks yet another extension. I urge EFSC to deny Pattern's request to extend the deadlines a third time.

It has been more than nine years since the preliminary application was filed, and more than seven years since the project was first approved. If Summit Ridge were a viable, worthwhile project, construction would have been underway years ago. Yet the developer admits that it has not been able to find a buyer for the power, obtain financing, or enter into any construction contracts for the project, despite the previous two extensions.

I am particularly concerned that the raptor survey data for this project is outdated. It has been eight to nine years since the project site and vicinity were last surveyed for bald and golden eagles, and three to four years for other raptors. Previously, the U.S. Fish and Wildlife Service expressed serious concerns about this project's impacts and recommended a six-mile buffer between turbine sites and bald and golden eagle nests. Pattern now asks EFSC to extend the construction deadlines yet again, but has failed to perform updated surveys. Without that information it is impossible for EFSC and the interested public to determine the current impacts of the project on eagles and other raptors. In addition, technology for mitigating harm to birds—such as radar technology for curtailing operations during migratory periods—has changed substantially in the nine years since this project was first proposed. Because Pattern has neither disclosed the project's true impacts, nor explored suitable mitigation of these impacts, a third extension is inappropriate and should be denied.

For these and other reasons, the requested third extension of the construction deadlines should be denied. If Pattern Energy desires to move forward with this controversial project, it must file a new application, complete with current data and information on the project's impacts. Please deny the requested third extension of time to initiate construction.

Sincerely,
Mr. Bruce Lumper
6377 Mill Creek Rd The Dalles, OR 97058-8506 wilkslumper@gmail.com

MAY Luke * ODOE

From: kpottermom@everyactioncustom.com on behalf of Dave Potter <kpottermom@everyactioncustom.com>
Sent: Friday, February 22, 2019 9:07 AM
To: MAY Luke * ODOE
Subject: Protect Columbia River Gorge Eagles

Dear Siting Analyst Luke May,

Mr. Beyeler and Members of the Council:

My wife and I strongly support the use of renewable energy.

But, like everything, good sense, studies and facts must be used to make the best employment of renewable energy.

I write about the latest efforts to make the Summit Ridge Wind Farm happen. This perhaps could be a good project. BUT what is for sure not good is their failure to use the latest, most effective knowledge and means of protecting birds from striking the blades. The company must be forced to incorporate all the latest knowledge in design, siteing and other project phases.

Also not good is locating the towers in the view sheds of very high value areas along the Columbia River and Deschutes River scenic areas. There are other wind sites that will not forever damage these wonderful public assets.

For at least these two major concerns, the project should be required to do "ground up" new planning. We urge that the best way to force this to happen in their corporate, lawyer filled world is to decline to give them addition permit extensions. Require a whole new permit application and processing.

Sincerely,
Mr. Dave Potter
3930 Rio Vista Way Klamath Falls, OR 97603-7729 kpottermom@yahoo.com

PLEASE RETURN THIS FORM TO THE COUNCIL ASSISTANT
*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)
Date: Feb. 22, 2019 Location: The Dalles
REGISTRATION FOR PUBLIC COMMENT

Name: Nathan Baker
Address: 333 SW 5th Ave., Suite 300 Portland, OR 97204
I represent (if applicable) Friends of the Columbia Gorge
Print your name OR your organization/business name.

☑ Send me future notifications about Council meetings via email.
My email address is: Nathan@gorgefriends.org

☑ I wish to address the Energy Facility Siting Council and/or
☐ I wish to submit the following written comment:

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

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*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)

Date: _____ Location: _____

REGISTRATION FOR PUBLIC COMMENT

Name: Jill Barker

Address: P.O. Box 572 - Mosier OR 97040

I represent (if applicable) Columbia Gorge Audubon Soc.

Print your name OR your organization/business name.

☒ Send me future notifications about Council meetings via email.
My email address is: jilbarkr@aol.com

☒ I wish to address the Energy Facility Siting Council and/or

☒ I wish to submit the following written comment:

See attachment

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

Feb. 21, 2019

Dear members of the Oregon Energy Facility Siting Council,

I am writing to your council to ask you to deny Pattern Energy's request for what would be their third extension of the construction deadlines of the Summit Ridge Wind Farm project. They have not provided a good reason for you to grant this extension.

Pattern Energy originally applied for a site certificate for the Summit Ridge Wind Farm over nine years ago. The project was approved over seven years ago, so why was it not built? Most importantly it was not built because this poorly sited wind energy project has not been able to find a market/buyer for the power that it would produce. Also Pattern Energy has not even obtained the critical funding sources for their project or secured their construction contractors.

If there is no real demand for the power generated by this project, then what is its true purpose? The whole concept of this unnecessary proposed wind farm is frivolous, wasteful and deceitful in a region that is already overly saturated with wind power that does not have enough back-up from the existing power grid.

In other regards, this project is a great threat to bald and golden eagle populations, as well as to all other raptors, songbird and bat populations and even to game birds. The Deschutes River Canyon is a critically important north/south flyway corridor for both migratory and resident birds.

The Deschutes River has long been designated a Wild and Scenic River by the US Congress, and is thus a federally protected area that is used extensively for recreation and outdoor experiences, as well as for its quiet solitude and scenic beauty. Those experiences would not be possible with 72 five-hundred foot wind turbines whirling, screeching and looming over the west rim of the canyon. Imagine that in your mind's eye. What an horrific landscape that would reveal!

Additionally, Pattern Energy has not initiated new avian surveys or updated existing surveys and recommendations conducted so long ago by the US Fish & Wildlife Service. This data is so important to truly understand the real impacts these turbines would have on all the wildlife in the vicinity.

As an assistant at the Rowena Wildlife Clinic, I have learned to appreciate each and every patient that we attend to. I see what it takes to treat and rehabilitate injured wildlife and raptors in particular. These wind turbines have proven to kill and maim far more birds than the energy corporations have predicted or admitted to. These raptor and other bird populations cannot afford the losses they would suffer if this project is extended again without proper current environmental assessments or review of its impacts.

In closing, I urge your council to deny another extension for the construction deadlines for this project. The reason for a denial speaks for itself since there is no demand for the power that would be generated by this project. It is not even an economically viable project.

Thank you for your attention.

Sincerely yours,

Jill Barker

Jill Barker,
OR Conservation Chair and Vice President of the Columbia Gorge Audubon Society

P.O.Box 572
Mosier, OR 97040
541-806-0260
jilbrkrb@aol.com

PLEASE RETURN THIS FORM TO THE COUNCIL ASSISTANT
*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)
Date: _____ Location: _____
REGISTRATION FOR PUBLIC COMMENT

Name: Peter Cornelison
Address: 1003 5th St. Hood River OR 97031
I represent (if applicable) _____
Print your name OR your organization/business name.

☐ Send me future notifications about Council meetings via email.
My email address is: _____

☐ I wish to address the Energy Facility Siting Council and/or
☒ I wish to submit the following written comment:

Patton Development

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

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*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)

Date: 2/22/19 Location: The Dalles

REGISTRATION FOR PUBLIC COMMENT

Name: Sheila Dooley

Address: 3300 Vensel Rd, Moses, Oregon 97040

I represent (if applicable) Sheila Dooley

Print your name OR your organization/business name.

☒ Send me future notifications about Council meetings via email.
My email address is: Sdooley3300@yahoo.com

☐ I wish to address the Energy Facility Siting Council and/or
☒ I wish to submit the following written comment:
Will be submitting letter to be read to Council also

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

February 21, 2019

Dear Chair Beyeler and Members of the Energy Facility Siting Council,

I am very concerned about the request for Amendment #4 to the site certificate for the Summit Ridge Wind Farm. I urge you to deny the request to extend the deadline a third time due to the lack of information needed for you to make an informed decision and the negative impacts the project would have.

This project was originally submitted about 10 years ago and the studies referred to in the application are older than that. They are very outdated.

The project is poorly sited and poses an unacceptable risk to bald and golden eagle populations along the Deschutes River Canyon and the eastern Gorge. During the nearly 10 years since the project was applied for there have been new advances in science and technology that would minimize harm to eagles. These need to be integrated into the project. New eagle surveys need to be conducted to replace the outdated information provided by the developer.

This project would also harm views along the lower Deschutes River and the Columbia Gorge National Scenic Area. It would forever negatively impact the recreational experience along the Lower Deschutes Wild and Scenic River.

Please deny this request due to the negative impacts it would have and the lack of the information needed to make an informed decision.

Sincerely,

Sheila Dooley

Sheila Dooley
3300 Vensel Rd.
Mosier, Oregon 97040
541-980-5769
sdooley3300@yahoo.com

PLEASE RETURN THIS FORM TO THE COUNCIL ASSISTANT
*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)
Date: 2/22/19 Location: The Dalles
REGISTRATION FOR PUBLIC COMMENT

Name: Linnea Fossum
Address: 3015 112th Ave NE, Bellevue WA 98005
I represent (if applicable) Tetra Tech on behalf of Pattern Energy
Print your name OR your organization/business name.

- ☐ Send me future notifications about Council meetings via email.
  My email address is: _____
- ☐ I wish to address the Energy Facility Siting Council and/or
- ☐ I wish to submit the following written comment:

_____
_____
_____
_____
_____
_____
_____

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

PLEASE RETURN THIS FORM TO THE COUNCIL ASSISTANT

*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)

Date: _____ Location: _____

REGISTRATION FOR PUBLIC COMMENT

Name: Irene Gilbert

Address: 2310 Adams Ave

I represent (if applicable) FORU + Irene Gilbert as an individ

Print your name OR your organization/business name.

☐ Send me future notifications about Council meetings via email.
My email address is: _____

☐ I wish to address the Energy Facility Siting Council and/or

☐ I wish to submit the following written comment:

Comments on Summit Ridge,

Yield time to Nath Baker

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

+

Luke May, Siting Analyst
Oregon Department of Energy
Energy Facility Siting Division
Salem, Oregon 97301
email: luke.may@oregon.gov

February 22, 2019

COMMENTS REGARDING SUMMIT RIDGE AMENDMENT 4

Rules applying to all applications and amended applications providing basic requirements for review and information to be reviewed.

Administrative Rule and/or Statute relied upon for all comments.
OAR 345-027-0085 covers requirements specific to requesting an extension to the construction deadlines. This administrative rule implements Oregon Revised Statute: ORS 469.503 This state law requires that the preponderance of evidence on the record supports the following conclusions: The facility complies with the applicable standards adopted by the counsil persuant to ORS 469.501 or the overall public benefits of the facility outweigh any adverse effects on a resource or interest protected by the applicable standards the facility does not meet.
In addition, ORS 469.503 states "In order to issue a site certificate, the Energy Facility Siting Council shall determie that the preponderance of the evidence on the record supports the following conclusions:" It goes on to state that the facility complies with the standards. It does not say that you THINK it will comply, or you will WORK OUT THE DETAILS so that it will comply. It sayss that there is evidence that it DOES comply. Putting off things as significant as a fire protection plan does not document compliance. Referring multiple tasks to be completed by the Oregon Department of Energy until a later date when there is no opportunity for the public to know whether or not there is compliance does not meet this standard. This amendment application is lacking in so many ways that my comments will only address the tip of the iceburg.
OAR 345-027-0075(l) Scope of Council Review
"In making a decision to grant or deny issuance of an amended site certificate, the council shall apply the applicable laws and Council standards required under Section (2) and in effect on the dates described in section 2)(b) (2)(b) states: "For a request for amendment to extend the deadlines for beginning or completing construction, after considering any changes in facts or law since the date the current site certificate was executed, the facility complies with all laws and Council standards applicable to an original site certificate application."
The rules are quite clear that an amendment to extend the construction start dates requires a full review of all council standards, regardless of whether or not the Council previously determined correctly or in error that a standard was met. My comments are

based upon 1) consideration of any changes in facts or law since the date the current site certificate was executed followed by 2) assuring the facility complies with all laws and Council standards applicable to an original site certificate application.

In order to determine if this facility currently complies with all laws and Council standards applicable to an original site certificate application, it is necessary to have the developer provide current, accurate information, not rely upon dated material from the previous site certificate owner.

Comment One:

ORS 469.310 and OAR 345-022-0000 require developments to be in compliance with water and other environmental protections including those of the Water Resource Department. ORS 537.545(l)(d) cannot be used to allow additional ground water use. The Operations and Maintenance Building is not considered a "domestic" structure.

Section 10.9 should not be changed. The Summit Ridge Wind Development is a commercial development which mandates a limit of 5,000 gallons per day well use absent permitting action. The change to the site certificate to support the develper's claim that the Operations and Maintenance building is considered to be a "domestic" purpose as opposed to an "industrial" purpose has no basis in fact. This action can only be interpreted as an attempt on the part of the developer to circumvent controls intended to protect critical ground water resources in this water scarce environment. The term "domestic purpose" is defined in Stroud's Judicial Dictionary (5th Edn.) the term "domestic purpose" is stated to mean use for personal residential purposes N.D.M.C v Sohan Lal Sachdev, (2000) 2 SCC 494 (497. This is a commercial site, not a residential site. It is also not consistent with ORS 469.310 or OAR 345-022-0060, Fish and Wildlife habitat due to the fact that wetlands and streams are dependent upon water coming from ground water reserves which would be impacted. This is also not consistent with Land Use Rules included in OAR 345-022-0030 requiring protection of Natural Resources.
The applicant provides no documentation that this building was built for "Personal residential purposes" as opposed to being used for commercial purposes relaterd to the monitoring, managment and coordination of the generation of electricity.

Attached is documentation from Wasco County's web site showing the results of their public survey which indicates a significant level of public concern regarding the availability of water for future needs.(l)
A second attachment entitled "Groundwater Issues in Parts of Wasco County" by Josh Hackett, Hydrogeologies, Groundwater Hydrology Section of the State of Oregon Water Resources Department shows declining well water levels in the are of this proposed wind development(2)

Given the declining water levels in the area, and the fact that this is not a "residential development", there should be no bending of the rules to allow this development to access additional water resources.

Comment Two:

The Summit Ridge Wind Development is not in compliance with OAR 345-022-0040 requiring protected sites to be protected or the Cumulative Effects Standard OAR 345-024-0015 which requires that the applicant can design and construct the facility to reduce cumulative adverse environmental effects in the vicinity by such methods as using underground transmission lines, designing the facility to reduce risk of injury to raptors or other vulnerable wildlife in areas near turbines or electrical equipent, designing the components to minimize adverse visual features, and other methods.

The siting of this development in this location and placing turbines in the planned areas will have significant and cumulative impacts on the Lower Deschutes Wild and Scenic River which make it impossible for it to meet the requirements to issue a site certificate as required under OAR 345-022-0040. There are multiple different impacts which independently do not meet this requirement, and when viewed cumulatively as is required under OAR 345-024-0015 the data is overwhelming.

The Lower Deschutes River Management Plan requires that "There must be effective mechanisms and regulations in place--to provide for the long-term protection of those resources for which the river was deemed eligible." Scenic value is one of multiple values rated outstandingly remarkable for which the river was deemed eligible for the "Wild and Scenic Designation.(Note that the list of items the Council typically reviews is not incuded in the rule language and cannot be considered to be inclusive of all impacts needing to be reviewed.) Identification of the "Outstanding Remarkable" values that the designation is based upon includes the following: Cultural Pre-History--There have been identified 135 Pre-History Cultural Sites in the Lower Deschutes canyon and it is believed there are many more, Fisheries--It provides extensive spawning and rearing habitat for both resident fish and anadromous steelhead, chinook salmon and a regionally distinct run of wild sockeye salmon. Historic--There are 38 historic sites that have been documented relating to the Oregon Trail, early road and railroad construction. Recreation--Including fishing, hiking, camping, rafting, biking and relaxing.

The desciption of the scenic value states, "The Lower Deschutes River contains a diversity of landforms, vegetation and color. The river having carved a canyon nearly 2,000 feet deep in many locations out of rugged Columbia River basalt flows, provides a dramatic and diverse landscape. The clear water of the river framed by the green riparian vegetative fringe creates a stark contrast to the often barren and broken reddish and brown cliffs and hillsides of the canyon." ."

This river is enjoyed by thousands of people each year who use boats to access the area. The Summit Ridge Development will have negative impacts on virtually all the "outstanding remarkable" values it has. I will review some, but not all of the impacts

that will damage the values of this river.

1. The development is likely to have a significant negative impact on water resources within the canyon and the surroiunding area. There is documentation that the weight and vibration of wind turbines can cause damage to the movement of water into the groundwater system. In additon, the large concrete pads keep water from being able to move into the water table. This area currently has problems with groundwater restoration which is resulting in the water table going down. The Deschutes River receives water from springs and streams which are fed by the ground water system. If this development is going to be built, there needs to be long-term monitoring of changes in the water table in the area in comparison with areas outside the impact of the turbines. The reduction in ground water resources is a significant threat to the fish habitat as noted in attachments as reduced groundwater flow and the need to artificially recharge the water table results in sediment flowing into the river as well as a reduction in river flow. References: "Wind farms and groundwater Impacts: A guide to EIA and Planning considerations", Version 1.1, April 2015 Department of the Environment, Northern Ireland Enciroment Agency. (4); "Groundwater level Declines in the Columbia River Basalt Group and their Relationship to mechanisms for groundwater recharge: a conceptual groundwater system model. Columbia Basin Ground Water Maagement area of adams franklin, grant, and lincoln counties" June 2009, GSI Water Solutions, Inc.(5) and "Columbia Plateau Groundwater Availability Study" by the USGS, Washingon Water Science Center (6). This document also includes nine additional references which should suffice to show that approving a development that will impact the water table is a serious concern, which requires ongoing monitoring and holding the developer financially responsible for negative impacts should they occur, which appears likely.

2. The development will have a significant negative impact upon the visual quality of the Wild and Scenic Deschutes River which is addressed by OAR 345-022-0040 as well as the Land Use Rule OAR 345-022-0030. This rule states that it needs to be determined that facilities located outside the scenic corridor are not likely to have a significant adverse impact to the area.

The response to the issue of visual impacts to the Lower Deschutes River Canyon on Page 52 of the Draft Proposed Order on Request for Amendment 4 show a complete misunderstanding of the purpose and management of Wild and Scenic Rivers. The Draft Proposed Order states, "Relating to the Lower Deschutes River Canyon, the turbines would be visible from various locations along the river, however, they would not dominate views, would be subordinate to the landscape, or would otherwise be visible from areas that are considered to be "GENERALLY INACCESSIBLE." The council findings are stated thusly, "The Council previously found that the facility would not result in significant adverse visual impacts to any of the above protected areas. The council's reasoning was based, in pertinet part, that the protected areas were either (1)

not managed or protected for scenic qualities; or that (2) THAT THE FACILITY WOULD NOT BE VISIBLE IN AREAS READILY ACCESSIBLE BY THE PUBLIC." The Lower Deschutes is managed to protect its "outstandingly remarkable" visual values. In addition, the designation at "Wild and Scenic" clearly communicates that being readily accessible is not a consideration in the designation, however, these were the only areas where any visual modeling occurred, and that was only in 5 locations along the entire impacted river as noted on the attached map. (7)

I did not find current use figures other than the fact that there are concerns regarding the numers of people floating the river, however figures from 1990 for segment 4 indicate at least 19,597 river boater days occurred during 1990.(8) Attachment 7 shows in yellow the areas of the Wild and Scenic Corridor being impacted by the development. Attachment (9) shows the primitive campsites along the stretch of river which would be overshadowed by turbines from Summit Ridge The fact that turbines will be visible intermittently for over 20 miles of the river is a significant impact, and the fact that there are areas where the public will be seeing not only the turbine rotors, but also portions of the supporting structures and lights at night indicates there will be a large and invasive presence in the landscape.

Contrary to previous comments from the Oregon Department of Energy, WCCP, Goal 5 Policy 5 stating the" Deschutes and John Day River Scenic Waterways shall be maintained and protected as natural and open space areas with consideration for agriculture and recreation" directly apply to this comment as does WCCP Goal 6 Policy 1 encouraging land uses and management practice which preserve both the quantity and quality of air, water and land resources." I refer you to the state statute, since statutes cannot be ignored or overruled by the Council. ORS 197.015(5) defines "Comprehensive Plan" means a generalized, coordinated land use map and policy statement of the governing body of a local goverment that interrelates all functional and natural systems and activities relating to the use of lands, including but not iimited to sewer and water systems, transportation systems, educational facilities, recreational facilities, and natural resources and air and water quality management programs. "Comprehensive" means all inclusive both in terms of the geographic area covered and functional and natural activities and systems occurring in the area covered by the plan. "General Nature" means a summary of policies and proposals in broad categories and does not necessarily indicate specfic locations of any area activity or use. A plan is "coordinated" when the needs of all levels of governments, semipublic and private agencies and the citizens of Oregon have been considered and accomodated as much as possible. "Land" includes water, both surface and subsurface, and the air." In other words, the language does not have to be specific in the manner stated by the Council and Department in determining that the Local Land Use Plan was not specific enough to be considered.

Any statements which indicate that the public has minimal concern with the impacts on this River, such as those made by the developer in their request for a Type B review are dishonest. The file regarding this development starting with the original application

and continuing through the current amendment No 4 contains multiple comment letters from individuals and groups indicating that the visual impacts of this wind development on the Wild and Scenic Deschutes River are unacceptable. I am attaching by reference all those previous comments as well as those which will no doubt be submitted regarding this amendment request as documentation that the visual impacts are seen as very significant according to the public, non profit groups and agencies.

Each time actions have been taken on this development which provided an opportunity for public participation, there have been comments indicating that the Council determination that there woud be "no significant impact" to the Wild and Scenic Deschutes River was not correct. "Visible portions of turbines may include turbine blades, nacelles, and in some cases, protions of the tower. It is possible that several turbines visible from the Deschutes River will require FAA lighting thus increasing the impacts to the night sky." These statements alone would lead an individual to the conclusion that the impacts are significant as was argued by Friends of the Columbia Gorge. The Oregon Department of Energy stated in one final order that the objector had not established that the visibility from the area precludes compliance with the standard. The developer has the burden of showing that the site meets the standard through a "preponderance of evidence." That evidence does not exist in this case. The developer has not established through documentation that the level of impact these turbines will have on both the resource and the interests of those individuals utilizing the wild and scenic deschutes should be judged as having "no significant impact" In fact, it would be prudent to establish that individuals floating a "wild and scenic" river would find it a signfiicant impact if they looked up to see wind turbines intermittently along the canyon ridgeline of their wilderness adventure. Among the documents from previous Summit Ridge applications that are being referenced are: 1. Septmeber 18, 2014 letter from BLM recommending that turbines be placed outside the viewshed of the lower Deschutes River.; September 9, 2014 letter from Oregon Parks and Recreation indicating concern due to the fact that turbines will be visible from the Deschutes river along several locations; Comments received from Doug Heiker, Oregon Wild stating concern regarding negative impacts on Scenic Values. The original site certificate did not disclose the content of most of the comments received, however, there were over 19 different public submissions, and at least a portion of them were stated to include comments regarding the impacts to the Lower Deschutes River. Energy Facility Siting Council meeting minutes from Mar. 4, 2011 reference a report from Sue Oliver regarding this development stating, "Impacts of greatest concern were potential visual impacts to the Columbia River Gorge National Scernic Area and the Deschutes River."

4. There will be significant impacts to the wildlife utilizing the Lower Deschutes. OAR 635-415-0005(3) is the definition applied to OAR 635-415-0025 which is the habitat mitigation policy applied to EFSC defines "essential habitat" means any habitat condition or set of habitat conditions which, if diminished in quality or quantity, would

result in depletion of a fish or wildlife species" The area of impact to golden eagles is significantly larger than the 1/2 mile from the site boundary as is planned as the survey area and which excludes the significant number of raptors which nest along the ridgelines above the Lower Deschutes river. Satellite telemetry data provide very accurate information on bird locations collected remotely and consistently for the life of the transmitter Analysis of over 28,000 satellite telemetry data points from eight golden eagles in Washington State show that a little over 50 percen of their activiy is confined to within a two-mile radius of their nest, just over 85 percent of activity is within four miles, and nearly all their activity is within six miles of their nest site (Jim Watson, WDFW unpubl. data) Accoring to (Kochert et al. 2002) Home ranges of nesting golden eagles average about 10 mi square. representing a home range radius of about 1.75 miles around the nest. These figures are consistent with the raptor studies performed by ODFW during the assessment of the wildlife risk at the previously proposed Antelope Ridge Wind Development in Union County, Oregon. This is but one example of the inadequacy of the wildlife surveys being required. The current site certificate in condition 10.7 goes so far as to change the current site certificate to limit the required wildlife surveys to within 400 feet of areas of disturbance that fall within the siting corridors. This limited area for wildlife surveys is clearly not consistent with the definition in OAR 345-00l-0010(2) which describes the analysis area as "containing resources that the proposed faility may significanty affect".When the impact to raptors is being killed by turbine blades, there is little doubt that the affect is significant. It is also not consistent with the general requirements in OAR 345-00l-0010(59) which defines the "Study Area" for impacts to threatened and endangered animal species of 5 miles and and use impacts and impacts to fish and wldlife habitat as one-half mile.

In the past, the Oregon Department of Energy and Energy Facility Siting Council have addresssed each impact on a protected area independently of one another. While that procedure may be used initially, the Cumulative Impacts standard as well as the Protected Area Standard require a full review of the multiple negative impacts that will occur. There is a significant group of citizens that find that multiple impacts taken separately are significant in their impact, there is no question that when reviewed as a whole, the impacts are significant and unacceptable. It is precisely as a result of the multiple plans, laws, public and private groups and individuals input that provides a preponderance of evidence that this resource requires protection and that there are significant impacts which will occurr under the proposed site certificate.

3. There will be significant negative impacts to the outstanding significant recreational opportunities provided along and on the Lower Deschutes River. There is no documentation included in the application to indicate that the citizens who utilize this river for recreational purposes would not find that their "interest" in this resource are not significantly and negatively impacted by the intrusion of wind turbines standing above the canyon walls, the lights impacting their camping experience, and the increase in noise that may very well come with this development. I include noise due to the fact

that noise modeling does not account for either the height the noise is being generated from or from the impacts of the topography in terms of the canyon walls magnification of the noise. There is no indication that there is any monitoring planned to assure that the development is actually within the noise limits in spite of the lack of peer review studies confirming that the model being used will accurately predict impacts on this terrain.

4. Negative impacts to raptor use of the Deschutes River Gorge and habitat damage is addressed in comment four.

Comment Three

The management of weeds at the site of the Summit Ridge Wind Development is not consistent with the requirements of ORS 569.390 which states that the owner or occupant of land containing noxious weeds is responsible for assuring that no noxious weeds are permitted to produce seed. ORS 569.445 also requires that no machinery shall be moved over any public road without first thoroughly cleaning it. The current weed management plan will not preclude the spread of noxious weeds into the area of the Wild and Scenic Deschutes River or the farm land and wildlife habitat in the area. The Management Plan for the Lower Deschutes Wild and Scenic River states that lands will be maintained to achieve a minimum of 60 percent of the ecological vegetative potential within 15years with the long range goal being the achievement of full potential. Upland vegetation on BLM lands will be managed to maintain between 51 and 75 percent of the plant composition found in the wild. Failure on the part of the proposed development to adhere to the state rules regarding noxious weed management will negatively impact the efforts of BLM to meet their objectives for the Wild and Scenic Corridor.
The plan as proposed by the applicant is not in compliance with state law due to the plan to have monitoring and treatment only occur on an annual basis. Noxious weeds develope and go to seed in approximatley 3 month cyles. Monitoring and treatment needs to be timed to preclude this and will require at least two monitoring and treatment cycles each year. The weed management plan needs to be updated to include the requirement that no weeds be allowed to go to seed and requirement that no machinery use a public road prior to being cleaned.
OAR 345-025-0016 states that "In the site certificate, the Council shall include conditions that address monitoring and mitigation to ensure compliace with the standards contained in OAR Chapter 345, Division 22 and Diision 24." Weeds need to be managed and controlled for the life of the project. Summit Ridge is responsible for managing weeds within the site boundary on a schedule that assures that seeds do not disperse.

Issue Four:

The developer has failed to provide protection to raptors and their habitat. There are multiple statutes and rules that are not being complied with in relation to raptor's. ORS 469.501 (l) (e) under the heading requiring the Energy Facility Siting Council to adopt standards states, "Effects of the facility, taking into account mitigation, on fish and wildlife, including threatened and endangered fish, wildlife or plant species." While raptors and specifically bald and golden eagles are not listed as "Threatened or Endangered" they are federally protected. The council was previously provided a letterd letter from Oregon Legislative Council stating that all animals must be considered under the habitat mitigation rules.

Allowing survey areas of only .5 miles from the site boundary for wildlife avoids acknowledging the outstandingly remarkable wildlife resources of the canyon. The designation of "outstandingly remakable" values of the Lower Deschutes River Canyon regarding wildlife states that there are over 300 species of wildlife. "Notable species are the bald eagle, peregrine falcon, osprey, Dalles sideboard snail and shortface lanx". The placement of turbines within habitat boundaries for bald and golden eagles constitutes a failure to provide protection from injury of federally protected wildlife. Some of the multiple statutes and rules which are not being followed in this action are:
OAR 345-022-0060
ORS 183.332 requirng conformity of state rules with equivalent federal laws and rules. It states, "it is also the policy of the state that agencies attempt to adopt rules that correspond with equivalent federal laws and rules unless specific criteria can be met."
OAR 345-024-0015(4), the Cumulative Effects Standard for Wind Energy Facility. It states that the department must assure that the energy developer is "...designing the facility to reduce the risk of injury to raptors or other vulnerable wildlife in areas near turbines or electrical equipment" By definition, federal threatened and endangered species as well as other protected species would be "vulnerable".
In addition, Oregon is currently in recept of at least two Section 6 grants including the Deschutes Basin Multi-Species Habitat Conservation Plan (Deschutes, crook, Jefferson, Klamath, Wasco and Sherman Counties) which require the state to provide protection for federally listed species in order to have these grants approved. Failing to honor this requirement can result in the state having to respond to a federal suit due to these actions.

Comment Five:
Condition 5.5 should not be changed. Contrary to the explanation provided, the generating capacity of the development must be included as a Mandatory Condition under OAR 345-025-0006(3) Failure to do so will not comply with ORS 469.407 which requires an amendment of an application to incease the capacity of a facility. It is clear that the capacity must be included in the site certificate.

Comment Six:

The Habitat Mitigation table is not consistent with OAR 345-022-0060 and OAR 635-415-0025. All elk winter range is considered Category 2 habitat and must be mitigated at a 2 to l ratio. There is no further determination that would result in a failure to mitigate for the entire 82.68 acres of temporary impacts and 68.01 acres of permanent impacts as listed on the Draft Proposed Order, Page 60. The only area which may not be winter range is approximately 1/2 of the transmission line which the developer indicates is a minute amount, See attached map. (12)

Comment Seven:

The application fails to comply with OAR 345-022-0000 and all other sections of Division 22 due to the fact that they failed to include in the site boundary all facilities including related roads.

It is very apparent from looking at the claimed site boundary for this project that the developer will be developing roads and having impacts which should be included both for habitat mitigation and all other requirements of the site certificate. Looking at the site boundary, which currently only encompases the siting corridors, there is little doubt that the developer will be crossing between the siting corridors as opposed to back tracking every time they move equipment or personnel from one siting corridor to another. By definition, all related roads that will be developed or modified to support this development are to be included in the site boundary.

Comment Eight:

The draft site certificate fails to comply with ORS 469.40l due to the failure to require monitoring to assure compliance with he standards statutes and rules described in ORS 469.50l and 469.503. Of significant concern is condition 10.5 on page 66 of the draft proposed orderr indicating that there will only be a two-year post construction fatality monitoring program, the lack of requiring bird fatality surveys during the life of the development, failure to require nest surveys for the life of the development, a failure to monitor groundwater impacts for the life of the development, etc

Comment Nine:

The proposed change to Condition 10.12 allowing construction to occur in Big Game Winter Range between December 1 and April 15 should not be made. The impacts to elk and deer due to the development of industrial wind facilities are well documented. The attached report regarding a study of deer and elk which was performed by Western EcoSystems Technology, Inc. (WEST) along with ODFW comments regarding the data show clearly that there are significant impacts which can lead to population level impacts when animals are displaced from their winter range. It would be irresponsible for ODFW to ignore their own research, and any such change in the minimal protections being provided this public asset after the public is removed from having input on the decision would be an abuse of power on the part of both the ODFW and EFSC. (13) It is outrageous that this change would be considered in a site certificate that was planned

to be issued under a Type B process which would have denied the public any access to a contested case.

Comment Ten:
The use of a pre-construction survey distancre of 500 feet fails to comply with both OAR 345-022-0060 Habitat Impacts and OAR 345-022-0070 Threatened and Endangered Species. Page 65 of the Draft Proposed Order indicates that there are records of 21 State Sensitive species. It then indicates that pre-construction surveys were completed within 500 feet of proposed facility components. I have no idea where this distance came from, but it is clearly not adequate under EFSC rules which require identification of wildlife and habitat which will be impacted by the development.

Comment Eleven:
WCLUDO Section 19.030(D)(l)(c) Setbacks
Based upon the analysis provided, an exception to allow turbines to be placed within 1.1 times the maximum turbine blade height rather than 1.5 times the height as is the standard in WCLUDO Section 19. fails to comply with OAR 345-024-0010 the Health and Safety Standard for Wind Developments. The applicant and the Department failed to address the hazards associated with ice throw in the review of health and safety impacts Attached is a peer review study documenting the distances of ice throw. Given the amount of harsh winter weather, ice throw is a predictable event. The developer should be provided the option of providing setbacks consistent with the WCLUDO Section 19 as the minimum acceptable distance, or utilize documentation from the turbine manufacturer (in the cass of GE turbines, it was previously documented as 1.5 times the height of the turbine, or use the attached ice throw calculations which will result in a significantly greater distances. ("Analysis of throw distandces of detached objects from horizontal-axis wind turbines" by Hamid Sarlak and Jens N Sorernson) (11)
There is no documentation to support the use of a setback of 1.1 times the maximum blade height as providing even a minimum safety factor.

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(1)

MENU

WASCO COUNTY 2040

Category: Water

Strategy	% of Responses
Promote or incentivize use of reclaimed water in certain applications	54.90%
Better educational resources	43.14%
Adding water conservation measures to conditional use permits	39.22%
Restrict development near watershed properties and/or waterways	33.33%
Minimize residential development by maintaining current minimum lot sizes	25.49%
Landscaping requirements for residential properties	19.61%
I don't think Wasco County should be involved in water conservation	17.65%
Water conservation is not an issue and parcel sizes should be smaller	9.80%

Water Conservation Public Input Results

Thank you to all participants at events and online! We got great feedback from people on how to leverage the land use planning program to help support conservation of water resources.

Results from the survey are closely aligned with what we heard at events; by in large, the community emphasized incentives and education as the best strategies for Wasco County 2040 to focus on when developing policy for water conservation.

Here are the results from the survey:

Strategy	% of Responses
Promote or incentivize use of reclaimed water in certain applications	54.90%
Better educational resources	43.14%
Adding water conservation measures to conditional use permits	39.22%
Restrict development near watershed properties and/or waterways	33.33%
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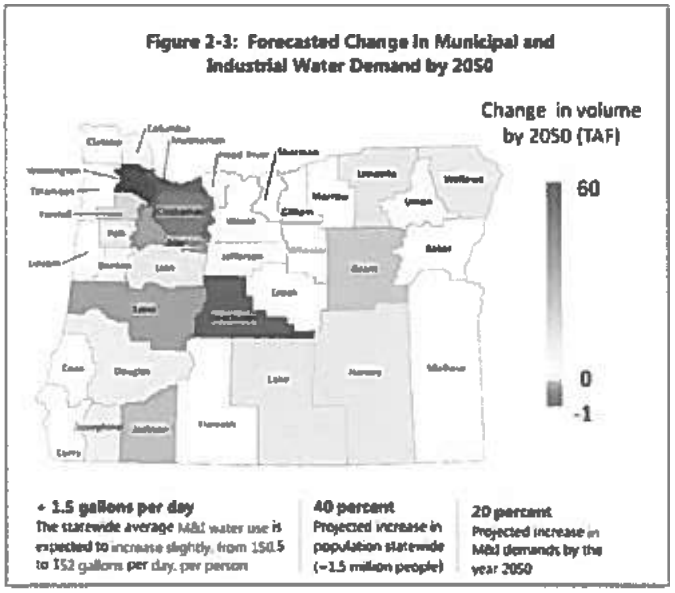
I don't think Wasco County should be involved in water conservation	17.65%
Water conservation is not an issue and parcel sizes should be smaller	9.80%

Wasco County Planning staff is currently preparing a report that analyzes all input during the last several months and offering some recommendations for Wasco County 2040 which will be initially presented to the Planning Commission in August.

We encourage you to attend our hearings, and submit comments online at any time.

If you are looking for more information about water conservation in Wasco County, we encourage you to visit the Wasco County Soil and Water Conservation District website for various resources.

You can also learn more about water rights, wells, drought, water conservation, and various other water related issues impacting Oregon by visiting the Oregon Water Resources Department's website.



Water Conservation and Farms

During the 2017 Vision work sessions, water was identified by the community as a priority for strategic planning. In May and June, during our 2018 road show series, water conservation ideas or other strategies related to water resources will be a topic of discussion.

The Oregon Water Resources Department (OWRD) manages water supply needs and rights, and works to restore and protect streams and watersheds to ensure long term water availability. In 2015, they produced a flyer with tips for summer conservation of water on farms and ranches: Saving_Water_Farms_Ranches

The flyer also has some additional resources for farmers and ranchers concerned about water and/or irrigation.

In 2017, OWRD adopted an Integrated Water Resources Strategy to address challenges throughout Oregon related to water.

The plan has useful data, including some forecasts for future water use:

Figure 2-2: Forecasted Change in Agricultural Water Demand by 2050

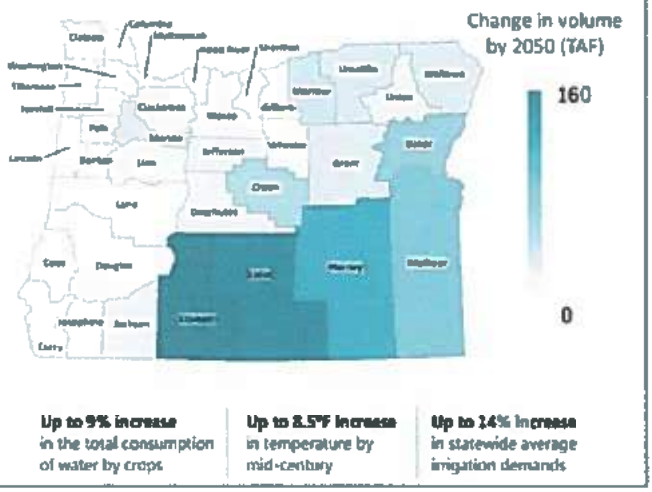
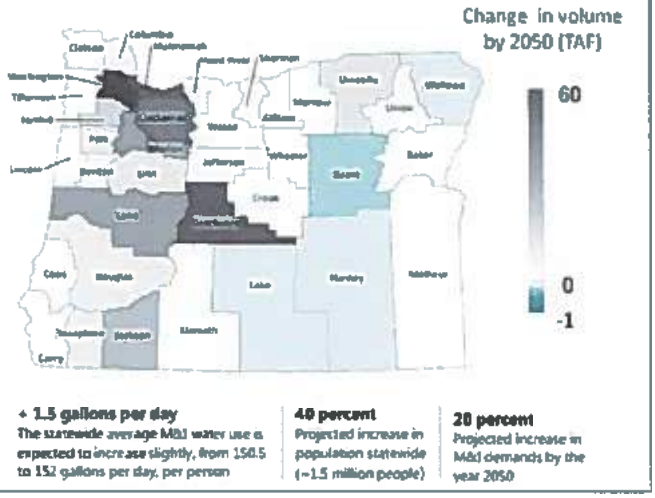


Figure 2-3: Forecasted Change in Municipal and Industrial Water Demand by 2050



These two graphics show that while Wasco County has a low predicted growth in municipal or industrial water over the next 30+ years, we will see an increase in agricultural water demand. This is, in part, because of a predicted 8.5 degree fahrenheit temperature increase by mid-century. (For detailed data on how they forecasted water demand, please see this document).

The implications for Wasco County 2040 are to think about ways land use planning and regulations for development can help support OWRD's strategies. The report has some specific recommendations for land use plans that we will be considering for Wasco County 2040:

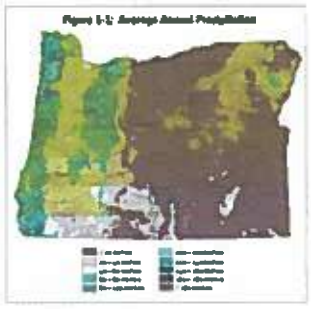
Table 10: Land Use Planning

Agency	Program
LOCAL GOVT	Comprehensive Land Use Planning – Develop and implement land use plans to comply with statewide planning goals and other laws. Comprehensive plans include policies on sewer and water systems, transportation systems, recreational facilities, natural resources and water quality management programs.

http //www oregon gov/lcd/pages/goals aspx

Public Facility Plans (Goal 11) – Describes the water, sewer and transportation facilities which are to support the land uses designated in the comprehensive plan. http://www oregon gov/lcd/docs/goals/goal11.pdf
Land Use Compatibility Statement – State actions must align with local comprehensive plans. Local governments complete a land use compatibility statement to approve state actions.
Ordinance – Specify the standards to be used in developing sewers, streets, water lines, and other infrastructure, and establishes procedures for approving development actions. Also develops floodplain ordinances.
Floodplains – Regulates development in floodplains. Issues floodplain development permits. Requires elevation certificates construction within the 100 year floodplain.
Coastal Shorelands Planning Area – Local governments are required to identify the location of areas subject to geologic and hydrologic hazards, and identify evacuation routes.

We look forward to hearing community feedback on how to address water resource challenges. You can participate now by submitting comments or taking our survey.



2017 Integrated Water Resources Strategy

In talking to community members to date, we have heard a lot of concerns about water and the future of water availability in Wasco County.

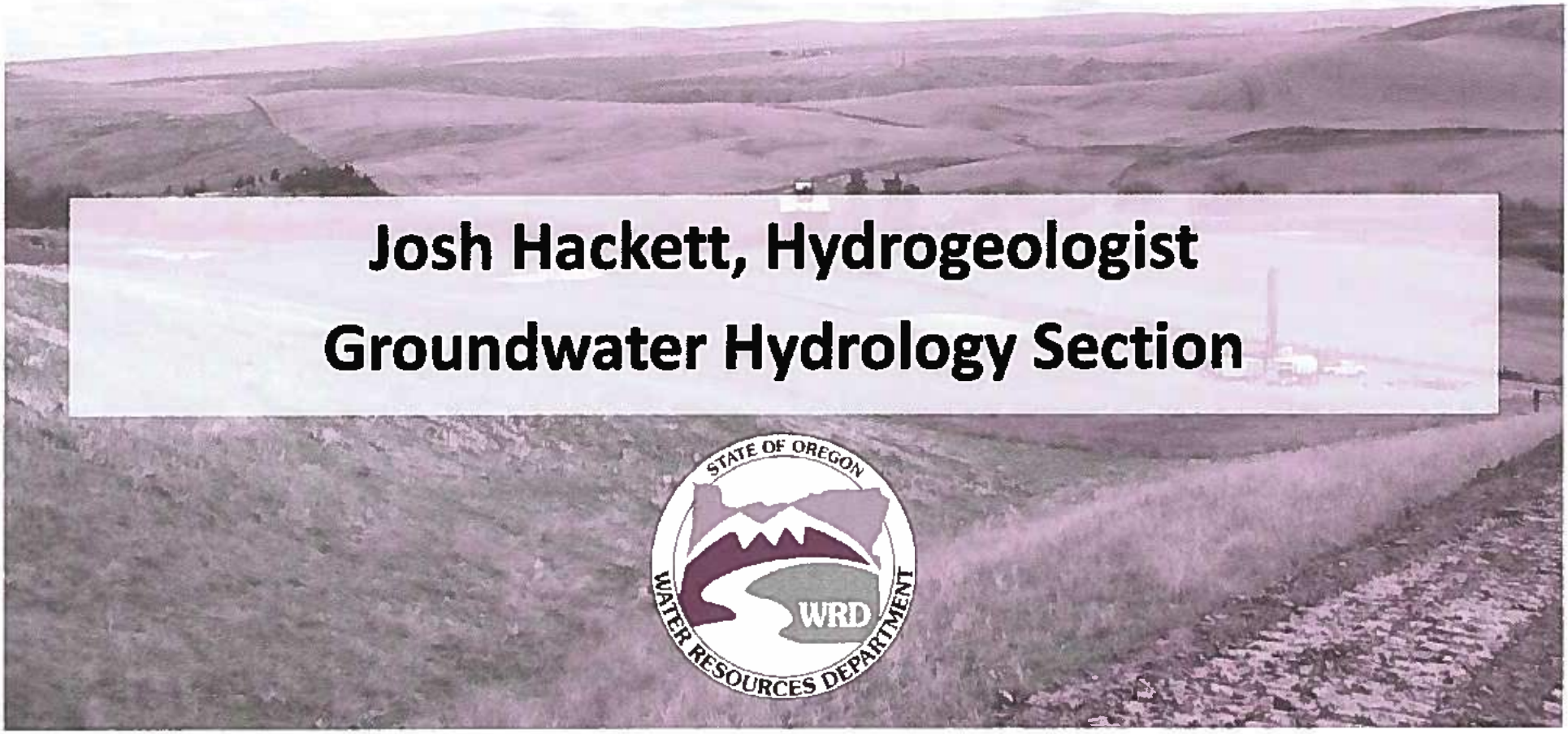
The Planning Department works with several partners who manage things like water rights and water health. A critical partner is the Oregon Water Resources Department (OWRD).

OWRD has a public draft available on their website of the 2017 Integrated Water Resources Strategy and will be accepting comments until July 19th. This document updates an original strategy adopted in 2012, and houses guiding principles to meet Oregon's need on the water systems statewide.

You can find contact information and get a pdf copy of the draft by visiting their site here: http://www.oregon.gov/owrd/Pages/law/integrated_water_supply_strategy.aspx#2017_Public_Review_Draft_Integrated_Water_Resources_Strategy

The Planning Department is currently working with partners to better understand our local water issues and potential strategies, so stay tuned for more updates!

Groundwater Issues in Parts of Wasco County



Josh Hackett, Hydrogeologist

Groundwater Hydrology Section

The Problem:

- **Water level decline in wells**
- **Decreased streamflow in hydraulically connected streams**

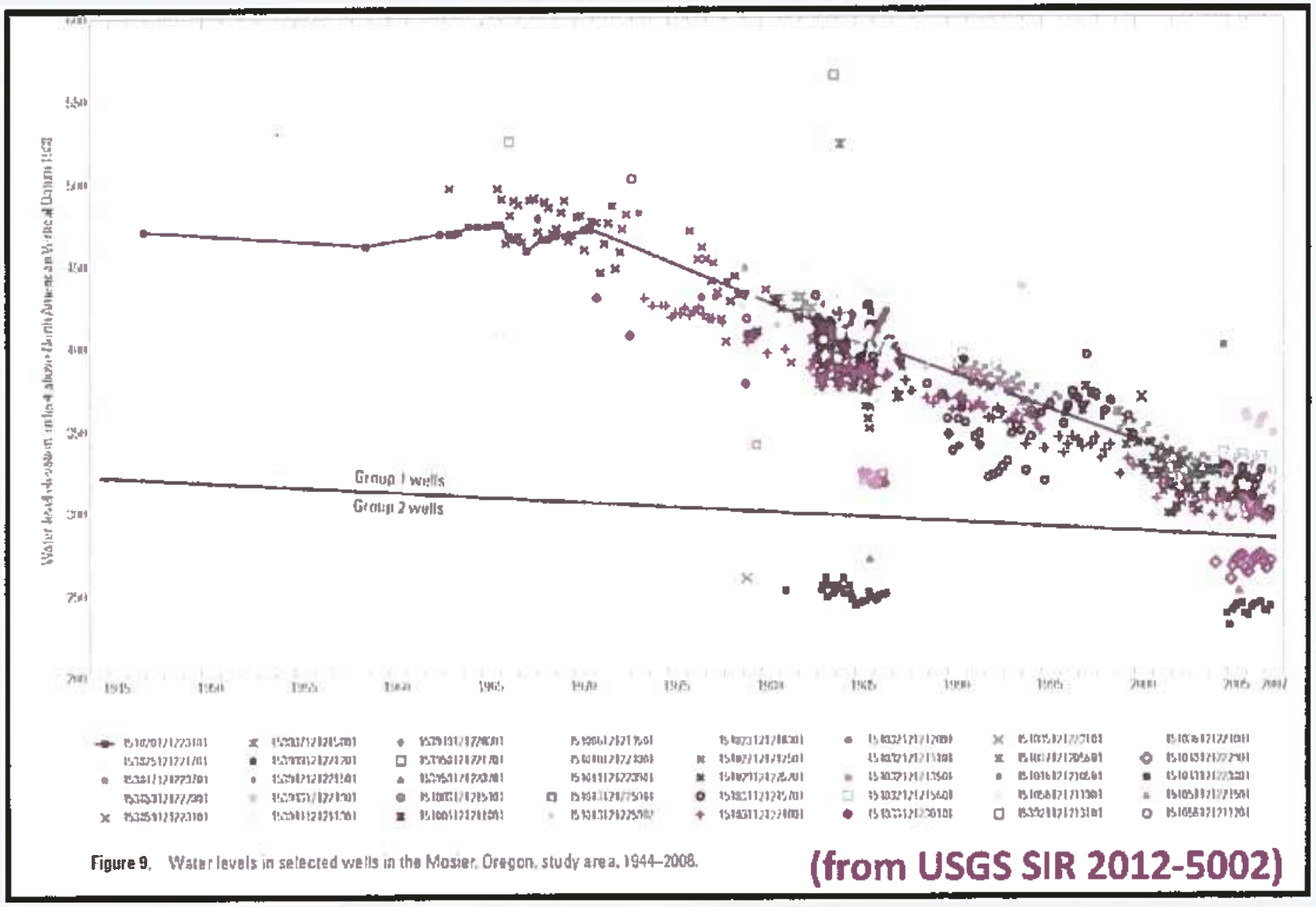
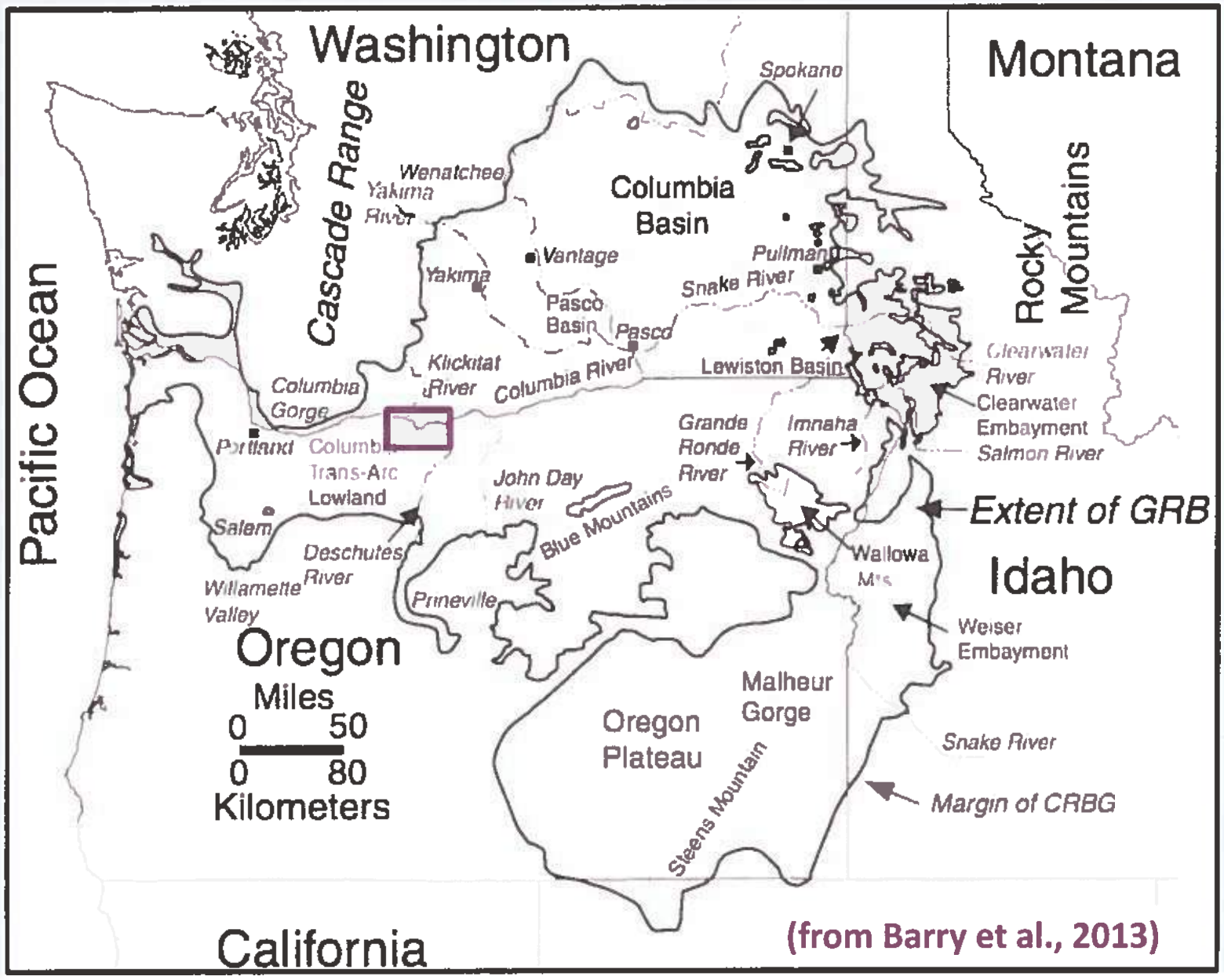


Figure 9. Water levels in selected wells in the Mosier, Oregon, study area, 1944–2008.

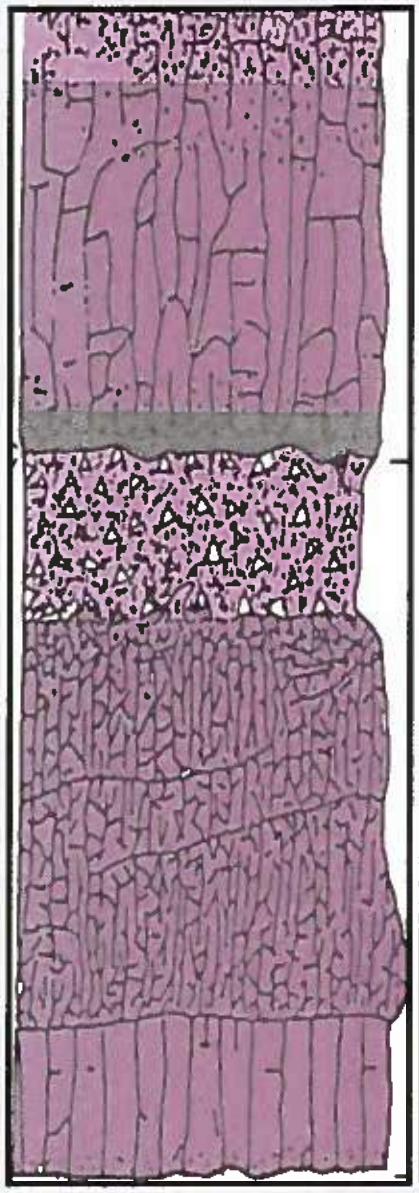
(from USGS SIR 2012-5002)

The Setting:



(from Barry et al., 2013)

Structure of Columbia River Basalt Flows



Flow Top

Dense Interior

Flow Bottom

Flow Top

Interflow Zone

Dense Interior

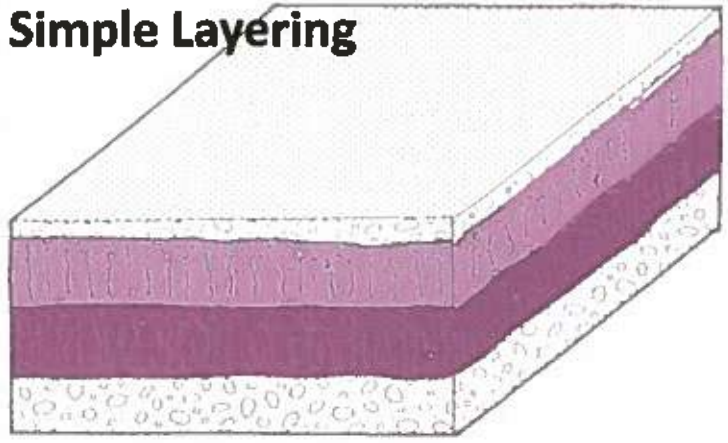
Flow Bottom

1) Flow Top
2) Dense Interior
3) Flow Bottom

Interflow zones (flow top & flow bottoms) can host aquifers

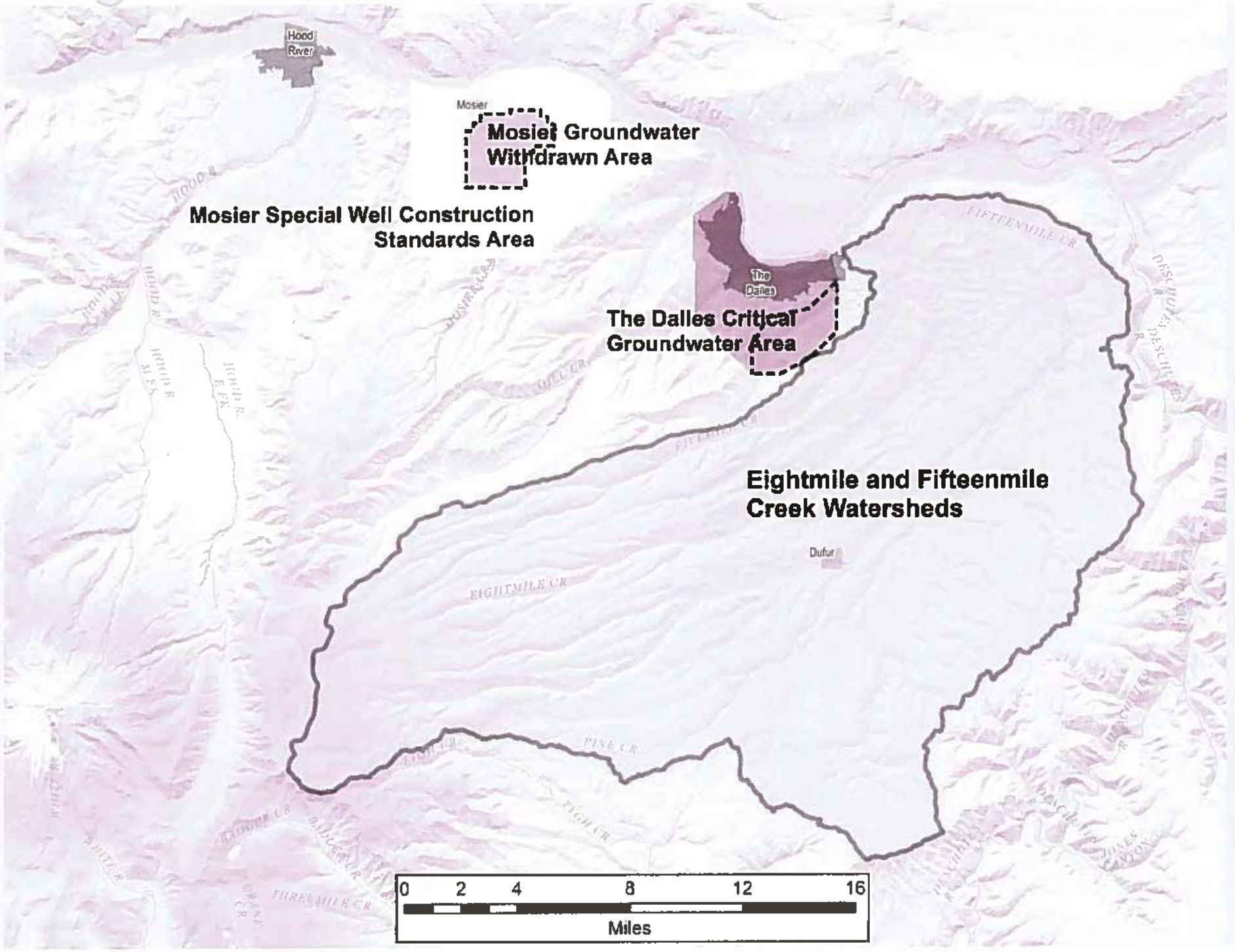
Interiors separate aquifers

Simple Layering



Potential Causes:

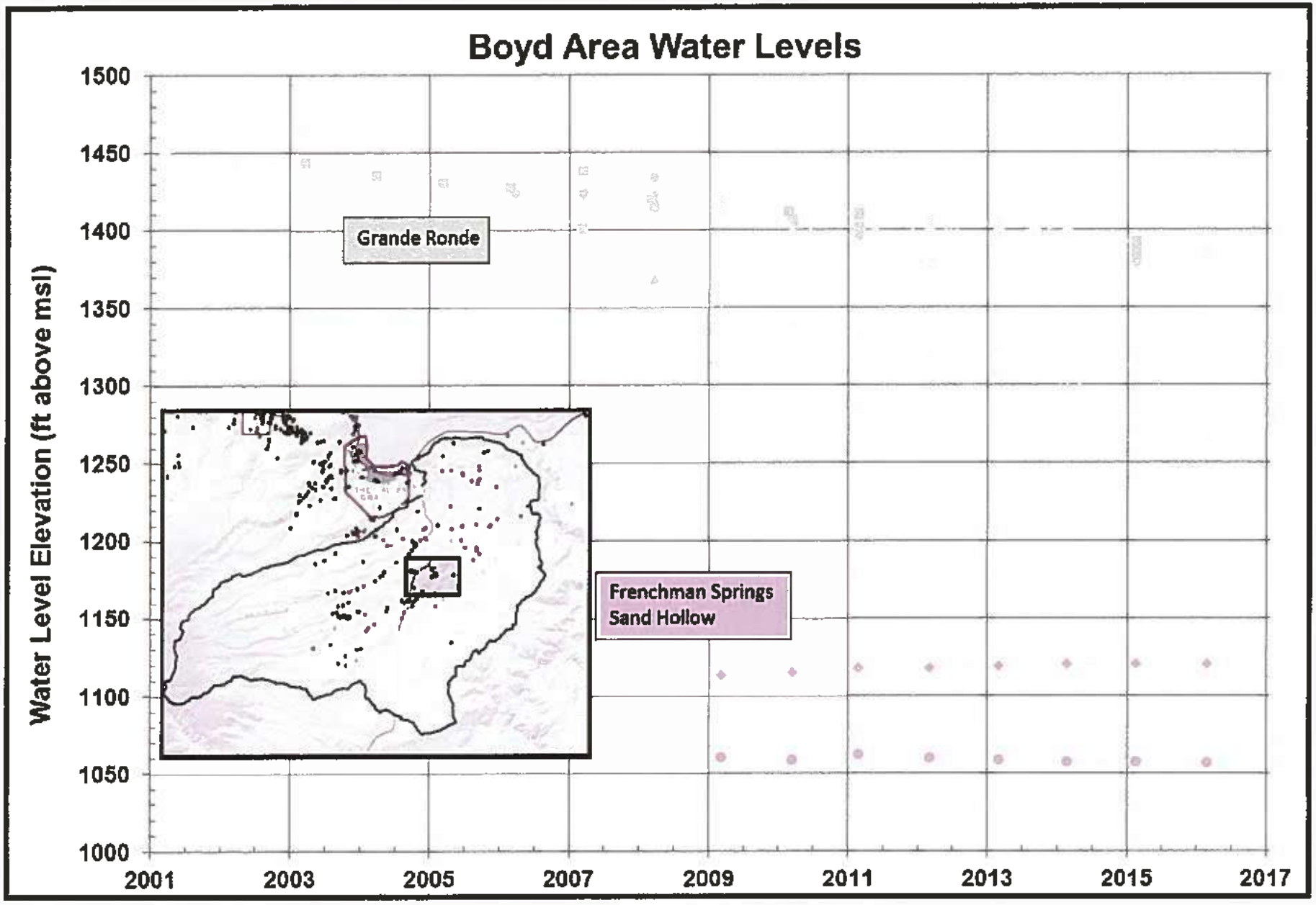
- Overuse
- Commingling Wells


Hood River
Mosier
Mosier Groundwater Withdrawn Area
Mosier Special Well Construction Standards Area
The Dalles
The Dalles Critical Groundwater Area
Eightmile and Fifteenmile Creek Watersheds
Dufur
0 2 4 8 12 16
Miles

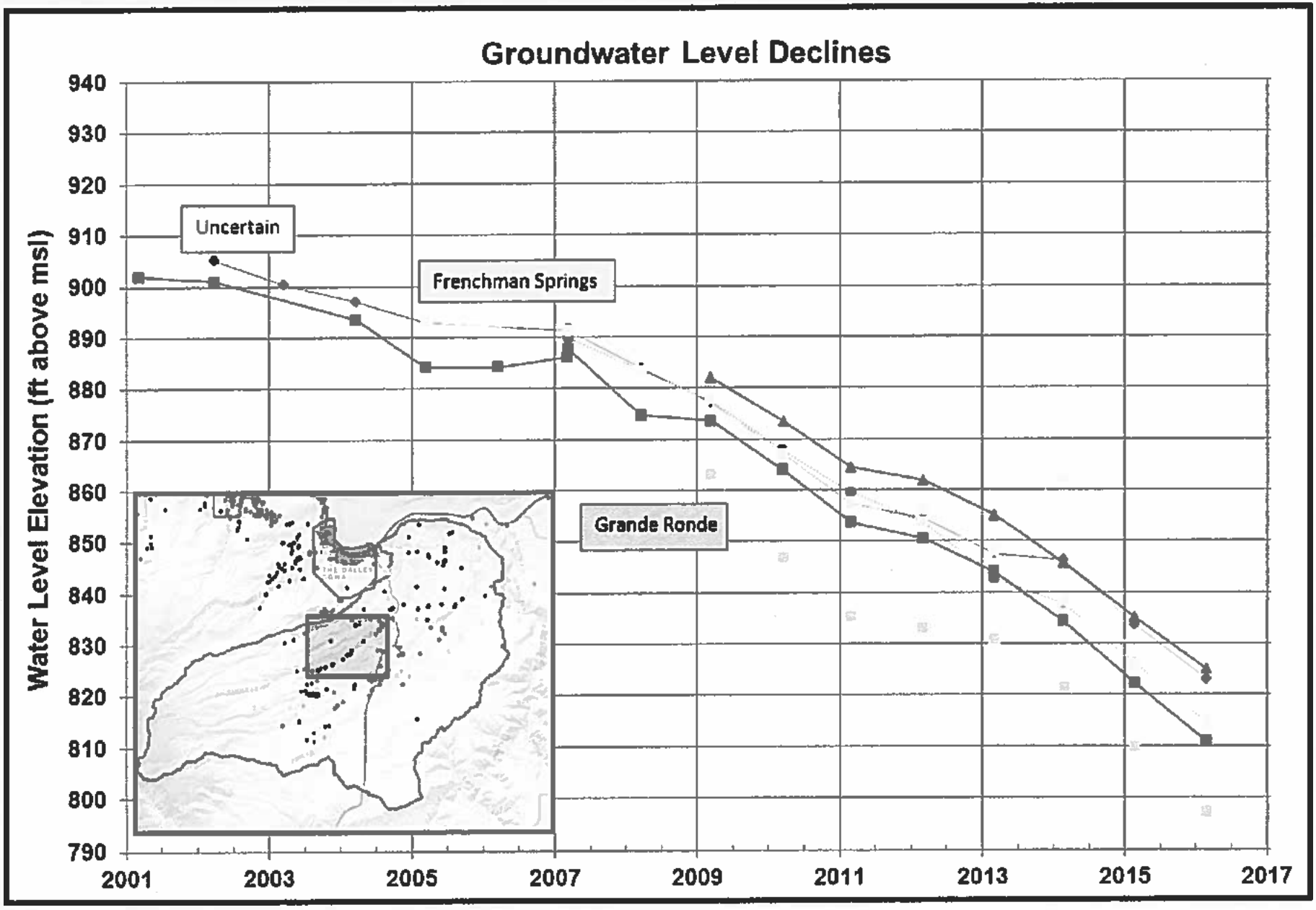
15 Mile Area Data Collection

- **Groundwater Level Measurements**
  - 80+ wells measured quarterly
- **Stream Gaging / Seepage Runs**
- **Drill Cuttings Samples**
  - 22 wells – 14 with complete chemical analysis
- **Surficial Geologic Mapping**
  - 6+ quadrangles
- **Groundwater pumpage data**
  - Read flowmeters and calculate use where available
  - Flowmeters required on newer water rights

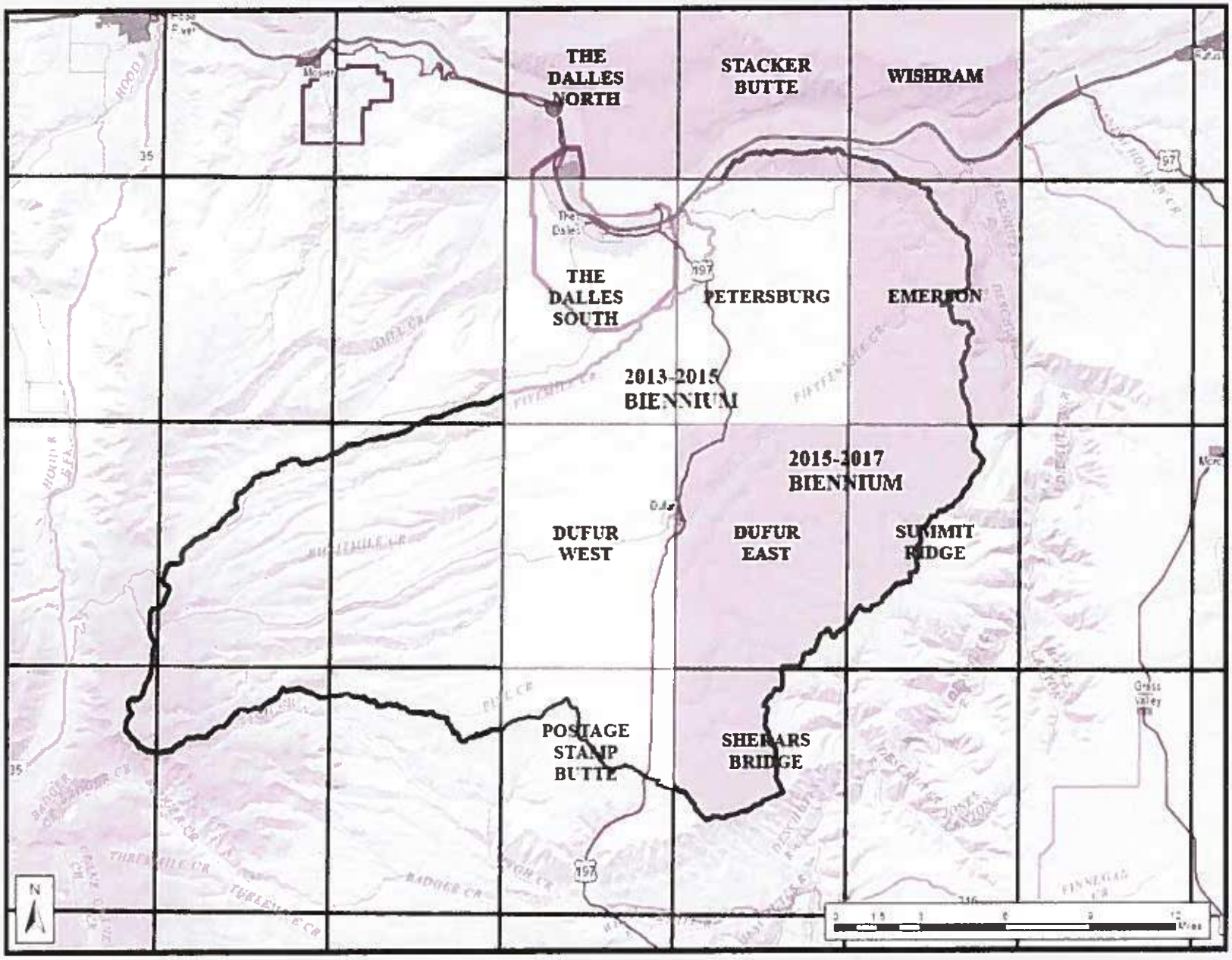
Boyd Area Water Levels



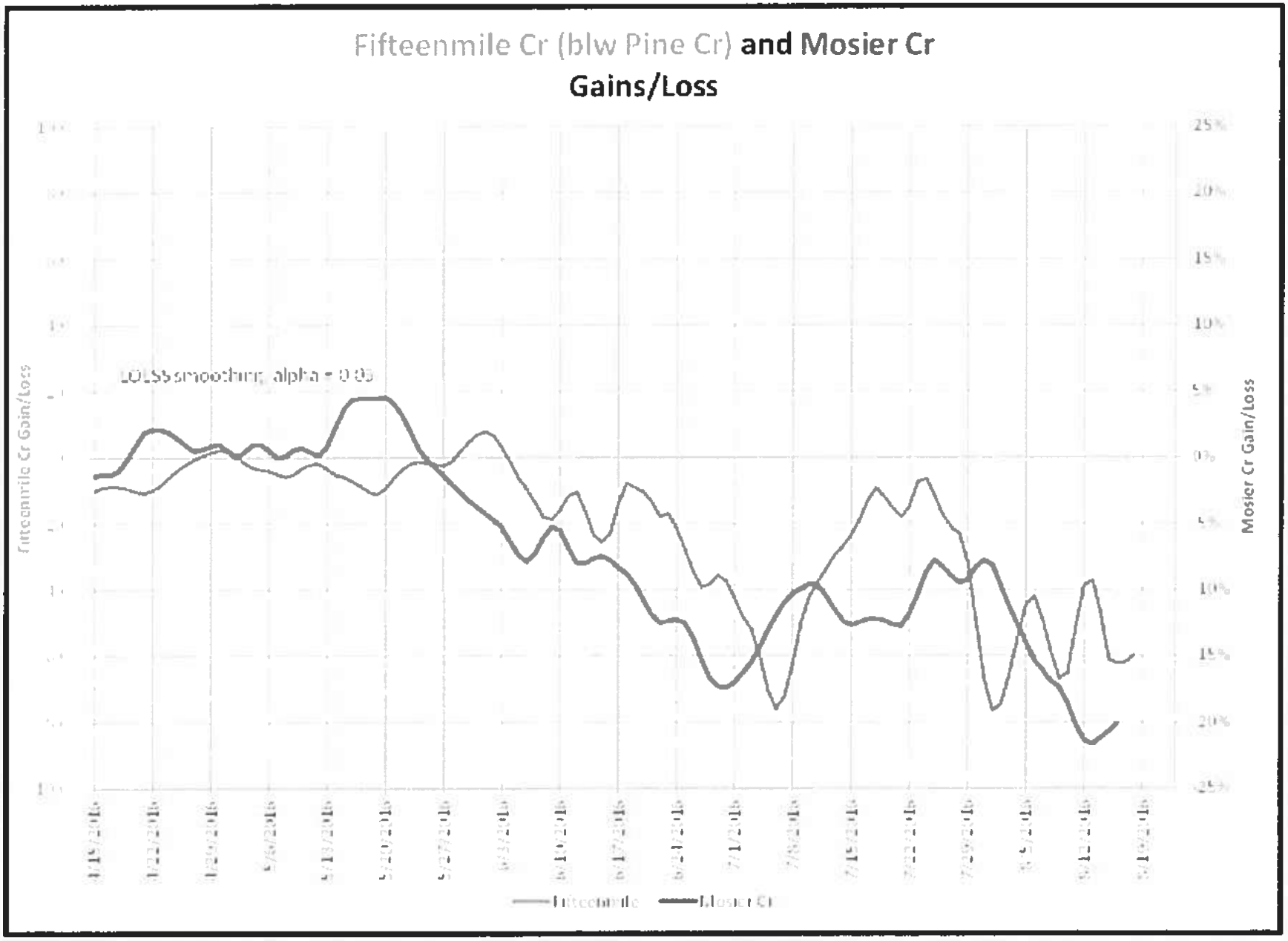
Area of Declining Water Levels



Geologic Mapping - Quadrangles



Stream Gaging



WHAT WE HAVE LEARNED

Data Source	Known	Unknown
Water Level Monitoring	- Declines occurring - Multiple aquifers - Similar trends over large area - Some wells commingle	- Due to overdraft, commingling, or both? - Total number of wells that commingle
Geologic Mapping	- Many geologic structures	- Effect on GW flow?
Stream Gaging	- Losing reaches - Some wells interfere with streams	- Total number of wells that interfere

CONTINUING WORK

- **Continue monitoring groundwater trends and surface water / groundwater interference.**
  - Increase continuous water-level monitoring
  - Identify wells connected to local streams
- **Advance our understanding of geologic/hydrologic framework**
  - Incorporate surficial and subsurface geology into 3D geologic model
- **Better estimate of GW pumpage from various aquifers**
  - More flowmeters?

Groundwater Area Restrictions

Management Tool	What It Does
Serious Water Management Problem Area	Requires measuring devices and water use reporting; provides technical data
Classification of Water	Designates approved uses of water
Withdrawal of Water	Withdraws groundwater; no or classified new rights
Groundwater Mitigation Area	Requires mitigation for new uses; may limit new uses
Critical Groundwater Area	May require measuring devices; may reduce and redistribute groundwater use
Special Area Well Construction Standards	Extra notice before drilling; Consultation before final well seal

(4)

Wind farms and groundwater impacts

A guide to EIA and Planning considerations

Version 1.1 / April 2015

PRACTICE GUIDE

An Agency within DOE
Department of the Environment
www.doeni.gov.uk

NIEA
www.doeni.gov.uk/niea
Northern Ireland Environment Agency

'This good practice guide aims to assist applicants and planning authorities achieve a consistent approach when considering wind farm development management on ground water. Its correct application should help applicants and planning authorities identify and satisfy legislative requirements with regard to groundwater in wind farm development projects.

This guide does not attempt to provide a detailed (account of the legislation and policy that underpin groundwater elements of wind farm developments in Northern Ireland and is not intended to be a source of legal advice. This guide is not intended to replace the need for judgement by planning officers and those making planning applications. Reference should always be made to the relevant legislation and if any discrepancy or conflict exists between the contents of this guide and the relevant legislation, the provisions of the legislation will prevail.

Further information can be obtained from the NIEA website ***www.doeni.gov.uk/niea****. Links to external sources of information have also been provided in the text, where appropriate'.*

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2 What impacts can a wind farm have on groundwater? 4

3 What does NIEA expect within an Environmental Impact Assessment in relation to groundwater for a wind farm application? 5

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5 Mitigation buffer zones 6

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Introduction

This guidance document aims to help developers identify and mitigate against potential impacts on groundwater associated with wind turbine applications. It helps to inform those producing Environmental Impact Assessments in support of planning applications for proposed on-shore wind farm developments in Northern Ireland. This advice note is also intended to offer guidance to local planning authorities considering the associated potential environmental impacts of onshore wind farm applications.

The guidance covers the main areas and issues to be considered when assessing the potential impact on groundwater. It should not be used to replace existing detailed guidance that may exist. Guidance is given on the collection of baseline information, use of mitigation buffer zones, and reference of Pollution Prevention Guidance Notes.

1 Why is it important to protect groundwater?

Groundwater has three major uses in Northern Ireland:

- Abstractions for agricultural and industrial purposes, food and beverage production (including bottled water);
- Public and private drinking water supply; and
- Maintenance of flow and water levels in rivers, lakes and wetlands, particularly during times of low rainfall.

The protection of groundwater from the risk of possible contamination is important because pollutants could cause health problems in human beings, reduce the quality of agricultural products, make water unsuitable for certain industrial processes, and pose a threat to our countryside and environment including their suitability for recreational purposes. In summary, the contamination of groundwater can not only have health and environmental impacts, but also serious economic consequences.

2 What impact can a wind farm have on groundwater?

The development of a wind farm has the potential to impact on groundwater quality, groundwater quantity and/or the established groundwater flow regime. Figure 1 overleaf shows the scale and extent of the foundation of a single wind turbine which could potentially impact on the aquatic environment. Changes to the local water environment can affect receptors such as wells/boreholes, springs, wetlands and waterways, and can also have implications for groundwater dependent ecology and/or land stability.

The key impacts to groundwater that can result from the construction, operational and decommissioning stages of wind farms are summarised in Table 1 below.

Table 1: Potential impacts on groundwater from wind farms

	Construction Phase	Operational Phase	Decommissioning Phase
Groundwater Flow Regime	**Earthworks and site drainage:** ▪ Reduction in water table if dewatering is required for turbine foundation construction or borrow pits; ▪ Changes to groundwater distribution and flow.	**Physical presence of turbines and tracks:** ▪ Possible changes to groundwater distribution; ▪ Reduction in groundwater storage. **Reduction of forestry in site area:** ▪ Changes to infiltration and surface runoff patterns, thereby influencing groundwater flow and distribution.	**Physical presence of former turbines and tracks:** ▪ Possible changes to groundwater distribution; ▪ Reduction in groundwater storage.
Groundwater Quality	**Earthworks:** ▪ Disturbance of contaminated soil and subsequent groundwater pollution. **Materials Management:** ▪ Pollution from spills or leaks of fuel, oil and building materials.	**Materials Management:** ▪ Pollution from spills or leaks of fuel or oil.	**Use of vehicles and machinery to remove infrastructure:** ▪ Pollution from spills or leaks of fuel or oil.

Figure 1: Construction of the foundation of a single wind turbine.

3 What does NIEA expect within an Environmental Impact Assessment in relation to groundwater for a wind farm application?

Within a wind farm Environmental Impact Assessment (EIA) NIEA will expect the following to be provided:

- Detail of the baseline conditions of the site, obtained from desk study and a field survey;
- Identification of potentially sensitive receptors (for example private drinking water supplies – see also 'Undertaking a water features survey – guidance note');
- Identification of potential impacts to groundwater from the development, and assessment of impact significance;
- Evidence of appropriate incorporation of mitigation buffer zones in the layout design; and
- Proposed mitigation measures in line with Pollution Prevention Guidance (PPG) Notes.

4 What data is collected for baseline conditions?

The degree of risk from the development is, in part, dependent on the sensitivity of local receptors. At a particular site, the local hydrogeological setting will influence the vulnerability of groundwater and associated receiving surface waters. For this reason it is important to establish local conditions prior to development, termed the baseline conditions.

The geology at the site will inform the hydrogeological setting, as well as other potential impacts; such as slope stability and peat slide issues. Information to be provided in the baseline should include:

- Quaternary (surface) geology and Bedrock geology mapping (provided by the Geological Survey of Northern Ireland (GSNI));
- Borehole log data if available (can be obtained from GSNI);
- The presence of peat to include data from a site walkover;
- Aquifer classification and vulnerability (can be obtained from GSNI GeoIndex); and
- The location of any proposed borrow pits and detail of their proposed restoration (as these may require dewatering) in addition to the proposed turbine and track layout.

A water features survey (to include a field survey) is required as it enables identification of the receptors that might be affected by the development both during and post-development. Guidance on undertaking water features surveys is provided in a separate NIEA Guidance Note. Early identification of sensitive receptors can be used beneficially to influence the design and construction of the wind farm to reduce potential risks.

The baseline conditions should also identify the potential for any existing contaminated or low quality groundwater at the site. The presence of these conditions at the site could affect the construction methods required (for example piling method or use of sulphate resistant concrete) or waste disposal required (for excavated soils or dewatered water disposal). An understanding of the historical setting of the site will determine if there is the potential for contaminated land or saline waters to be present.

The search radius for the baseline conditions will depend on the groundwater and surface water catchments likely to be affected.

5 Mitigation buffer zones

To reduce the risk of the wind farm development having an impact on the water environment the use of mitigation buffer zones should be considered in the layout design. Should elements of the development (tracks, foundations, borrow pits) be located within the buffer zones then further assessment (such as establishing the potential zone of contribution to the water feature) would be expected within the EIA to justify the expected impact significance.

Table 2 overleaf describes the mitigation buffer zone distances to be considered for potentially sensitive water features.

Table 2: Buffer zones for water features

Water Feature	Buffer Zone
Surface Watercourse	10 m (minimum detailed in PPG 5)
Water Feature [1] used for Drinking Water (public or private)	250 m
Water Feature [1] not used for water supply (but could provide a preferential flow pathway)	50 m
Designated Wetland	250 m

6 Mitigation measures

The presentation of mitigation measures for any wind farm development should make reference to the following Pollution Prevention Guidance Notes:

- PPG 1 – Understanding your environmental responsibilities;
- PPG 2 – Choosing and using oil storage tanks;
- PPG 5 – Works in, near or over watercourses;
- PPG 6 – Construction and demolition sites;
- PPG 13 – Vehicle washing and cleaning;
- PPG 21 – Pollution incident response planning;
- PPG 22 – Incident response – dealing with spills; and
- PPG 26 – Storing and handling drums and intermediate bulk containers.

The current PPG versions are found at:
http://www.netregs.org.uk/library_of_topics/pollution_prevention_guides.aspx

Water quality and flow monitoring prior to development to provide a qualitative and quantitative baseline might be required. In addition should an impact on a water supply feature be identified as significant then appropriate remediation measure(s) must be identified by the applicant. For example, in the case of a private water supply mitigation against deterioration in either the quality and/or the sufficiency of the supply should be considered.

[1] surface watercourse, spring, well, borehole

7 Information sources and further guidance

Geological Survey of Northern Ireland
Tel: 028 90388462
Website: www.bgs.ac.uk/gsni/
Email: gsni@detini.gov.uk
GeoIndex, geological maps, reports and memoirs, borehole and site investigation reports

SpatialNI
Website: www.spatialni.gov.uk/geoportal/catalog/main/home.page

Environment Agency, May 2002. I7 Scoping the environmental impacts of windfarms (on-shore and off-shore).

Drinking Water Inspectorate
Tel: 028 90569282
Website: www.doeni.gov.uk/niea/water-home/drinking_water.htm
Email: dwi@doeni.gov.uk
For further information in relation to private water supplies

DOE

Department of the Environment

www.doeni.gov.uk

NIEA Waste Management Unit
Klondyke Building
Gasworks Business Park
Cromac Avenue
Ormeau Road
Malone Lower
Belfast
BT7 2JA

T: 028 9056 9267
E: LGWinfo@doeni.gov.uk

INVESTORS IN PEOPLE

(5)

GROUNDWATER LEVEL DECLINES IN THE COLUMBIA RIVER BASALT GROUP AND THEIR RELATIONSHIP TO MECHANISMS FOR GROUNDWATER RECHARGE: A CONCEPTUAL GROUNDWATER SYSTEM MODEL, COLUMBIA BASIN GROUND WATER MANAGEMENT AREA OF ADAMS, FRANKLIN, GRANT, AND LINCOLN COUNTIES

JUNE 2009

PREPARED BY
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(6)

USGS
science for a changing world

Washington Water Science Center

Columbia Plateau Groundwater Availability Study

The Columbia Plateau Regional Aquifer System (CPRAS) covers about 44,000 square miles of eastern Oregon and Washington and western Idaho. The primary aquifers are basalts of the Columbia River Basalt Group and overlying basin-fill sediments. Groundwater availability issues in the basin include: 1) widespread water-level declines caused by pumping, 2) reduction in base flow to rivers and associated effects on temperature and water quality, and 3) effects of global climate change on recharge, base flow, and groundwater availability.

The USGS conducted a study of the Columbia Plateau Regional Aquifer System with the broad goals of: 1) characterizing the hydrologic status of the system, 2) identifying trends in groundwater storage and use, and 3) quantifying groundwater availability.

Problem: The Columbia River Basin in Washington, Oregon, and Idaho supports a $5 billion/year agricultural industry, leading the nation in production of apples and nine other commodities. Groundwater availability in the Columbia River basalts and the basin-fill sediments of the Columbia Plateau Regional Aquifer System (CPRAS) is a critical water-resource management issue in the Basin where the water demand for agriculture, economic development, and ecological needs is high. Groundwater availability is a primary consideration for balancing the conjunctive use of surface-water and groundwater supplies throughout the CPRAS.

Groundwater pumping from the Columbia River basalts has resulted in more than 300 ft of water-level declines in some areas of the aquifer system,

Status - Completed

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placing important agricultural sectors at risk. Groundwater depletion also has contributed to adverse environmental impacts. Declining groundwater levels have significantly reduced stream flows and have contributed to loss of wetlands and degradation of aquatic habitat. Current streamflow in many subbasins is inadequate for certain fish listed under the Endangered Species Act. Conversely, in some areas of the CPRAS excess recharge from surface-water irrigation over the past century has resulted in additional ground water in both the sediments and basalts that is potentially available for use. The excess 'artificial' recharge has created wetlands now dependent on continued irrigation, and has contributed to landslides and excess sediment loads in the Columbia River at the Hanford Reach National Monument.

Approach: The Columbia Plateau Groundwater Availability study began in October 2007 and ended in 2015. The major elements of the approach include:

1. Documenting changes in the status of the system. We compiled data from existing groundwater level monitoring networks maintained by a variety of agencies in the study area. We collected additional data in areas not covered by existing networks. The goal was to characterize the current status of groundwater levels and compare with the status in 1984 when the last regional scale compilation was made as part of the USGS Regional Aquifer System Analysis (RASA).
2. Quantifying the hydrologic budget for the system. We used a variety of hydrologic data and models to quantify the major components of the hydrologic budget for the aquifer system. The primary components of recharge include infiltration of precipitation and snowmelt and irrigation return flow. The primary components of discharge include groundwater pumping and discharge to streams.
3. Updating the regional geologic framework for the basalt aquifers. The RASA study mapped the extent and thickness of the major basalt formations and basin-fill sediments. We compiled and evaluated new geologic mapping and subsurface information and used it to refine the regional framework. The refined framework was also compiled in a three-dimensional spatial database
4. Developing a groundwater flow simulation model for the system. A conceptual model of the system based on the results of elements 1-3 was used to construct a three-dimensional numerical simulation model. The simulation model was used to evaluate and test the conceptual model and later to evaluate groundwater availability under alternative development and climate scenarios.

Explore More Science

Columbia Plateau Groundwater
Water Availability
Water Availability and Use
Groundwater Availability
Water Use and Availability
Groundwater
Water

Below are publications associated with this project.

Year Published: 2015

Groundwater availability of the Columbia Plateau Regional Aquifer System, Washington, Oregon, and Idaho

The Columbia Plateau Regional Aquifer System (CPRAS) covers about 44,000 square miles of southeastern Washington, northeastern Oregon, and western Idaho. The area supports a $6-billion per year agricultural industry, leading the Nation in production of apples, hops, and eight other commodities. Groundwater pumpage and surface-water diversions...

Vaccaro, J.J.; Kahle, S.C.; Ely, D.M.; Burns, E.R.; Snyder, D.T.; Haynes, J.V.; Olsen, T.D.; Welch, W.B.; Morgan, D.S.
Attribution: Washington Water Science Center, Water Resources
View Citation

Year Published: 2015

Groundwater resources of the Columbia Plateau regional aquifer system

The Columbia Plateau is a wide basalt plateau between the Cascade Range and the Rocky Mountains that covers parts of Washington, Oregon, and Idaho. The climate over much of the Columbia Plateau is semiarid with precipitation ranging from 7 to 15 in/yr in the central part (Vaccaro and others, 2015), yet the area supports a $6 billion per year...

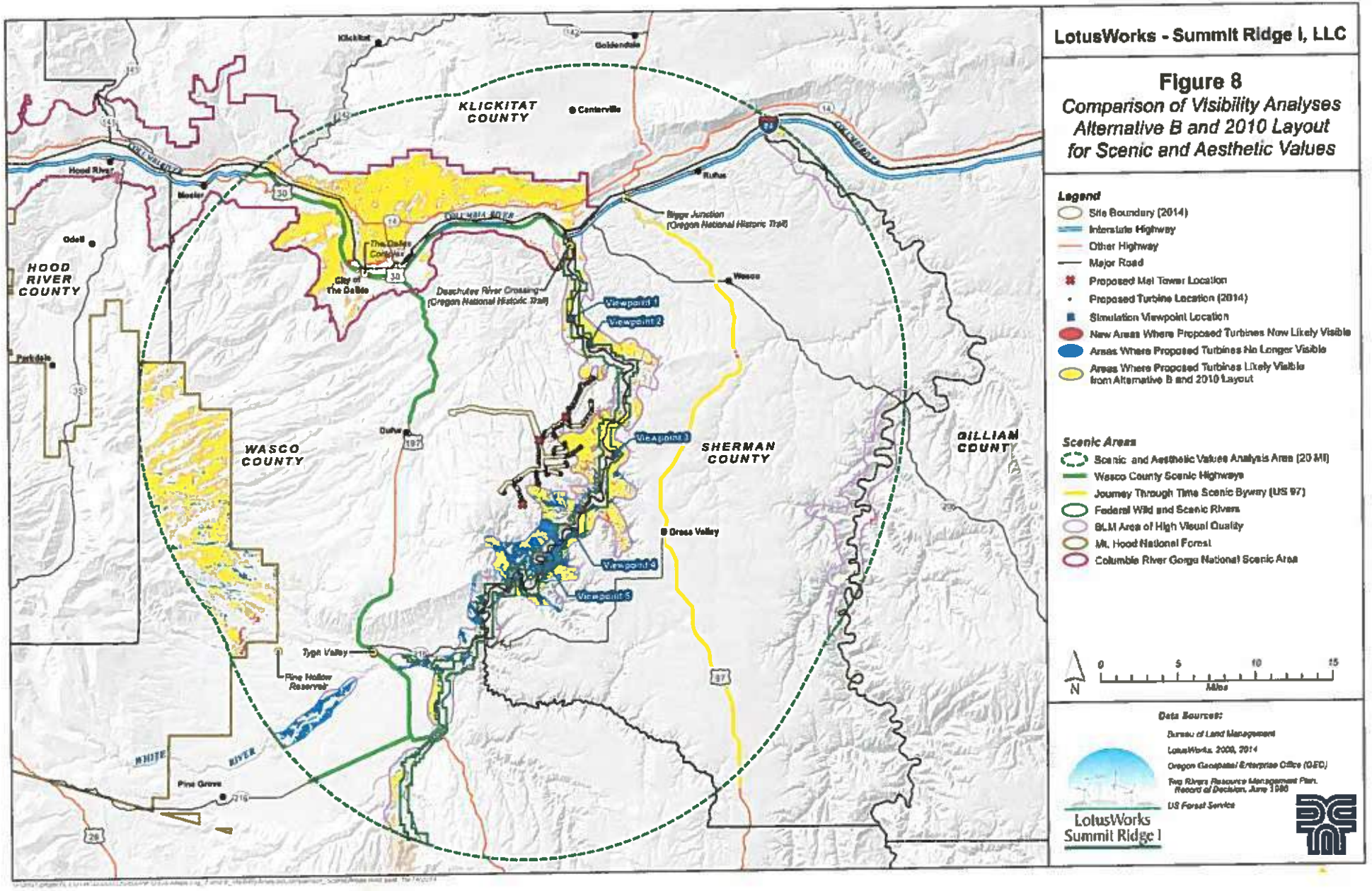
Kahle, Sue C.; Vaccaro, John J.
Attribution: Washington Water Science Center, Water Resources
View Citation

Year Published: 2014

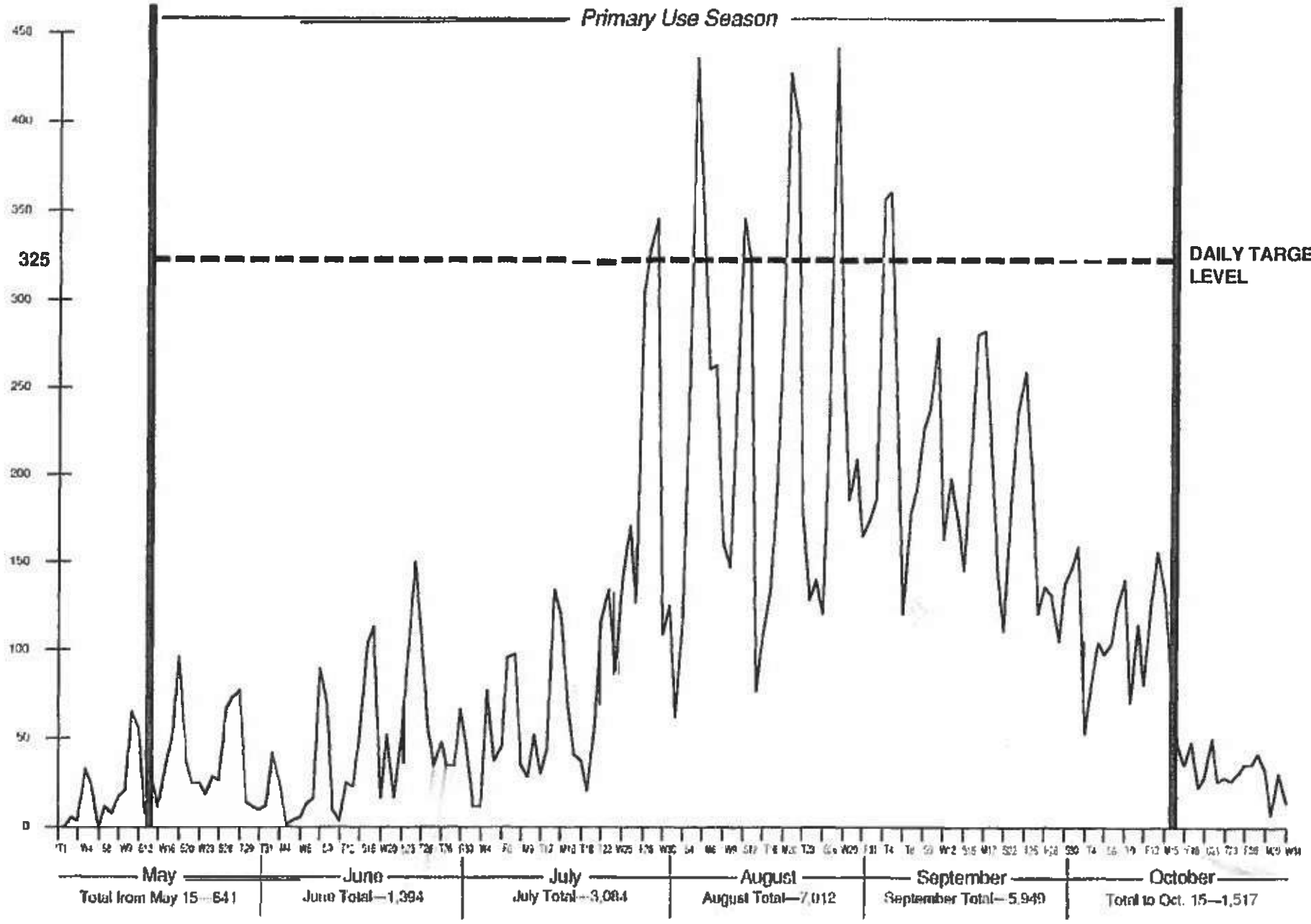
Numerical simulation of groundwater flow in the Columbia Plateau Regional Aquifer System, Idaho, Oregon, and Washington

A three-dimensional numerical model of groundwater flow was constructed for the Columbia Plateau Regional Aquifer System (CPRAS), Idaho, Oregon, and Washington, to evaluate and test the conceptual model of the system and to

(7)


LotusWorks - Summit Ridge I, LLC
Figure 8
Comparison of Visibility Analyses Alternative B and 2010 Layout for Scenic and Aesthetic Values
Legend
Site Boundary (2014)
Interstate Highway
Other Highway
Major Road
Proposed Met Tower Location
Proposed Turbine Location (2014)
Simulation Viewpoint Location
New Areas Where Proposed Turbines Now Likely Visible
Areas Where Proposed Turbines No Longer Visible
Areas Where Proposed Turbines Likely Visible from Alternative B and 2010 Layout
Scenic Areas
Scenic and Aesthetic Values Analysis Area (20 MI)
Wasco County Scenic Highways
Journey Through Time Scenic Byway (US 97)
Federal Wild and Scenic Rivers
BLM Area of High Visual Quality
Mt. Hood National Forest
Columbia River Gorge National Scenic Area
N
0
5
10
15
Miles
Data Sources:
Bureau of Land Management
LotusWorks, 2009, 2014
Oregon Geospatial Enterprise Office (GEO)
Two Rivers Resource Management Plan, Record of Decision, June 1986
US Forest Service
LotusWorks Summit Ridge I
KLICKITAT COUNTY
HOOD RIVER COUNTY
WASCO COUNTY
SHERMAN COUNTY
GILLIAM COUNTY
Klickitat
Goldendale
Centerville
Hood River
Mosier
Odell
Parkdale
Rufus
Wasco
Dufur
Dress Valley
Tygh Valley
Pine Grove
The Dalles Complex
City of The Dalles
Deschutes River Crossing (Oregon National Historic Trail)
Biggs Junction (Oregon National Historic Trail)
Viewpoint 1
Viewpoint 2
Viewpoint 3
Viewpoint 4
Viewpoint 5
Pine Hollow Reservoir
WHITE RIVER
COLUMBIA RIVER

Segment 4 - Number of Boaters by Day — 1990



Items listed on value axis above months represent day of the week and date for the year 1990.

Total for Primary Use Season 19,587.

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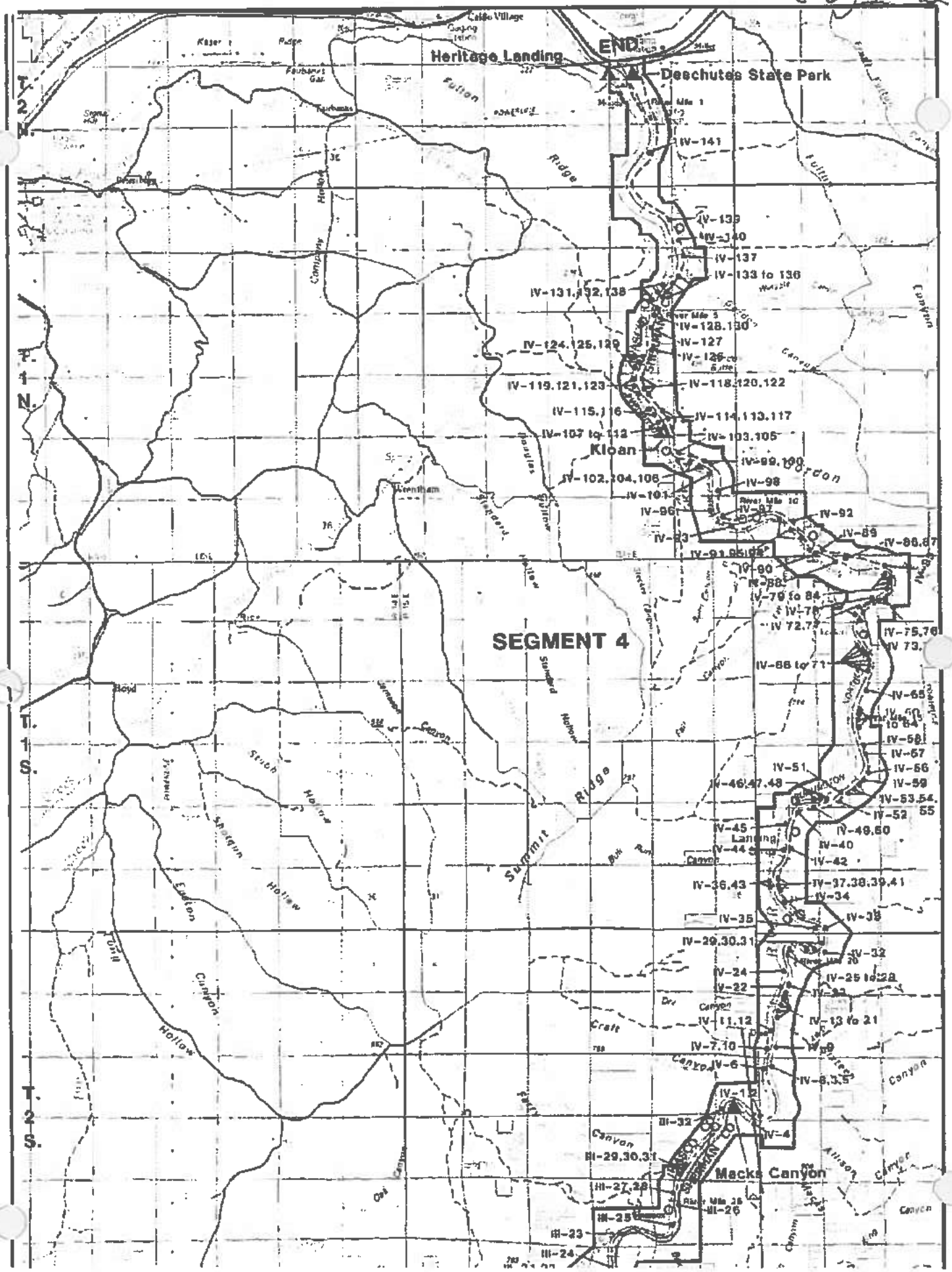

END
Heritage Landing
Deschutes State Park
Caldo Village
Fulton Ridge
Kloan
Gordon
SEGMENT 4
Summit Ridge
Landing
Macks Canyon
Wrentham
Boyd
T. 2 N.
T. 1 N.
T. 1 S.
T. 2 S.
IV-141
IV-139
IV-140
IV-137
IV-133 to 136
IV-131,132,138
IV-128,130
IV-127
IV-124,125,129
IV-126
IV-119,121,123
IV-118,120,122
IV-115,116
IV-114,113,117
IV-107 to 112
IV-103,105
IV-99,100
IV-102,104,106
IV-98
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IV-93
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IV-79 to 84
IV-78
IV 72,77
IV-75,76
IV 73,
IV-66 to 71
IV-65
IV-60 to 64
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IV-13 to 21
IV-7,10
IV-6
IV-8,3,5
IV-1,2
III-32
IV-4
III-29,30,31
III-27,28
III-26
III-25
III-23
III-24

Wind Energy

WIND ENERGY
Wind Energ. 2016; 19:151–166
Published online 19 February 2015 in Wiley Online Library (wileyonlinelibrary.com). DOI: 10.1002/we.1828

RESEARCH ARTICLE

Analysis of throw distances of detached objects from horizontal-axis wind turbines

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ABSTRACT

This paper aims at predicting trajectories of the detached fragments from wind turbines, in order to better quantify consequences of wind turbine failures. The trajectories of thrown objects are attained using the solution to equations of motion and rotation, with the external loads and moments obtained using blade element approach. We have extended an earlier work by taking into account dynamic stall and wind variations due to shear, and investigated different scenarios of throw including throw of the entire or a part of blade, as well as throw of accumulated ice on the blade. Trajectories are simulated for modern wind turbines ranging in size from 2 to 20 MW using upscaling laws. Extensive parametric analyses are performed against initial release angle, tip speed ratio, detachment geometry, and blade pitch setting. It is found that, while at tip speeds of about 70 m/s (normal operating conditions), pieces of blade (with weights in the range of approximately 7-16 ton) would be thrown out less than 700 m for the entire range of wind turbines, and turbines operating at the extreme tip speed of 150 m/s may be subject to blade throw of up to 2 km from the turbine. For the ice throw cases, maximum distances of approximately 100 and 600 m are obtained for standstill and normal operating conditions of the wind turbine, respectively, with the ice pieces weighting from 0.4 to 6.5 kg. The simulations can be useful for revision of wind turbine setback standards, especially when combined with risk assessment studies. Copyright © 2015 John Wiley & Sons, Ltd.

KEYWORDS
wind turbine accidents; blade element theory; blade detachment; ice throw; aerodynamic model; HAWT

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1. INTRODUCTION

The ever-growing number of wind turbines installed near inhabited areas, buildings and community facilities, such as bridges, power installations or highways, has resulted in an increasing concern by authorities to determine risk levels associated with wind turbine blade failure. From a safety point of view, the most serious failure is associated with splintering of rotor blades and detachment of debris, which could be thrown over long distances and damage people or property. Ice-throw from wind turbines installed in cold climate is also of high concern, especially for wind turbines erected near highways where the ice pieces thrown from a wind turbine may strike a passing car, which in the worst case may cause a fatal accident.

Various types of hazards regarding operation of wind turbines have recently been reported by Durstwitz and the Caithness Windfarm Information Forum.[2,3] According to a recent survey by the Caithness Windfarm Information Forum, blade failures resulting in either whole blades or pieces of blades being thrown from the turbine are the most important causes of turbine accidents.[3] A comparative graph showing the growth of wind turbine accidents over the past four decades is shown in Figure 1, where the share of blade accidents and accidents due to fire, which may eventually cause throw of fire patches, are also presented. Due to such accident data, energy authorities all over the world have tried to enforce safety distances around wind turbines and wind farms. The safety distance is a distance within which it is not allowed to build human structures such as buildings and roads. Shown in Table I is an example of the safety distance standards defined by different authorities. It can be seen from the table the values of offset safety distances fall within an extensive range of

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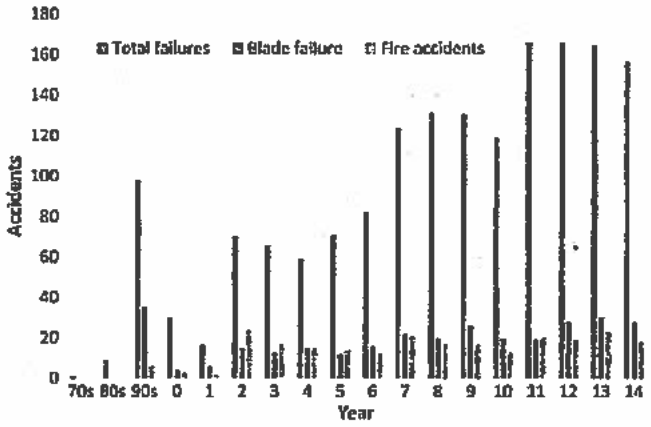

Figure 1. Comparison of wind turbine accidents and particularly blade failure data in a period from 1970s until 2014 (data taken from Caithness Windfarms[3]).

Table I. Safety distances of wind turbines from human structures as practiced in different regions of the world.[17]

Authority/source	Safety distance (m) (ft)
France	1609 (5280)
Germany	1609 (5280)
Rural Manitoba, Canada (1981)	(6500)
US National Research Council	762 (2500)
IL, USA	457 (1500)
Riverside County, CA, USA	3218 (10560)
MI, USA	304 (1000)

scales between 3.2km and 300m, and that the setback standards are not even similar in different regions of the same country. To standardize such safety guidelines, it is useful to employ mathematical models of the throw in various conditions and risk assessment tools to associate the probability of failure in each particular setting.

Motions of solid particles in fluids were first addressed analytically by Kirchhoff.[4] He showed that the equations of motion for a solid body in an ideal fluid reduce to a set of ordinary differential equations (ODE) based on Euler's equations. Further experimental investigations on falling objects revealed, despite originating from Euler's equations, various states of chaotic motion. It was also mathematically shown that Kirchhoff's equations had been prone to yield chaotic solutions [5]. Tanabe *et al.*[6] developed a set of two-dimensional equations of motion (including rotation) based on simple mechanics in which plates of zero thickness were subject to lift, friction and gravity forces. Based on those assumptions, they found five different falling patterns, ranging from a periodic movement to chaotic random motions depending on the density ratio between the solid and the surrounding fluid and on the length of the object. Pesavento and Wang[7] and Andersen *et al.*[8] performed more detailed studies to determine the motion of a falling two-dimensional elliptic object using direct numerical simulation of the Navier–Stokes equations. They took added mass and added moment of inertia into account and analyzed the transient motion and local jumps of the falling object thoroughly.

Due to complications in a real-life blade accidents (erratic motions, high Reynolds numbers, complex geometries etc.), the fundamental studies mentioned above could only partially help understanding the physics of wind turbine blade throw patterns. To cope with the wind turbine problems, simplified approaches were used. Macqueen *et al.*,[9] for instance, studied the problem of blade-throw from wind turbines, using classical ballistics and also assumption of constant lift and drag. A lift coefficient of $Cl = 0.8$ and a drag coefficient of $Cd = 0.4$ were used for the gliding simulations, with $Cl = 0.0$ and $Cd = 1.0$ for the tumbling motion. However, the probability that gliding would occur was deemed very small. Their maximum throw studies using simple ballistic analysis, that is, by neglecting aerodynamic forces, showed that in the extreme throw velocity of approximately 310m/s, the maximum throw length reaches 10km.

One of the first detailed studies on the aerodynamics of a detached wind turbine blade was performed by Sørensen[1] using a blade element approach. In this approach, the detached blade is divided into a number of sections and the aerodynamic loads are determined for each section. The total external aerodynamic load on the whole blade would then be determined as the summation of the individual forces on each section.

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The orientation of the detached part is determined through a matrix $\mathbf{R}$, which gives the transformation from global coordinates to the body-fixed coordinates

$$\begin{bmatrix}\vec{r}_1\\ \vec{r}_2\\ \vec{r}_3\end{bmatrix} = [\mathbf{R}]\begin{bmatrix}\vec{i}\\ \vec{j}\\ \vec{k}\end{bmatrix} = \begin{bmatrix}r_{11} & r_{12} & r_{13}\\ r_{21} & r_{22} & r_{23}\\ r_{31} & r_{32} & r_{33}\end{bmatrix}\begin{bmatrix}\vec{i}\\ \vec{j}\\ \vec{k}\end{bmatrix} \quad \text{and similarly,} \quad \begin{bmatrix}\vec{i}\\ \vec{j}\\ \vec{k}\end{bmatrix} = [\mathbf{R}^{-1}]\begin{bmatrix}\vec{r}_1\\ \vec{r}_2\\ \vec{r}_3\end{bmatrix} \tag{1}$$

Equation (1) holds for transformation of any variable between the two coordinate systems. This way of defining a vectorized rotation matrix (as opposed to Euler's scalar angles) ensures uniqueness of orientation angles and avoids the problem known as gimbal lock.

The full six degree-of-freedom motion is governed by Newton's second law of motion and Euler's equations of motion:

$$m\ddot{\underline{x}}_g = \underline{F} + m\underline{g} \tag{2}$$

$$\underline{\underline{I}}.\dot{\underline{\omega}}_b = \underline{\omega}_b \times (\underline{\underline{I}}.\underline{\omega}_b) = \underline{M} \tag{3}$$

where m is the mass of the blade, $\underline{x}_g$ is the position vector of the center of gravity, $\underline{F}$ is the aerodynamic force acting on the center of gravity, g is the gravitational acceleration, $\underline{\underline{I}}$ is the moment of inertia tensor, $\underline{\omega}$ is the angular velocity in the rotating frame of reference, $\underline{M}$ is the aerodynamic force acting along the principal axis of the moment of inertia tensor and $\dot{(.)}$ denotes differentiation with respect to time. To close the system, the following relationship between the motion of the unit vectors of the body (the blade fragment) and the angular velocity is used:

$$\dot{\underline{r}} = \underline{\omega} \times \underline{r} \tag{4}$$

where $\underline{\omega}$ is the angular velocity of the blade fragment in the inertial coordinate system, which by equation (1) is transformed into the local body-fixed coordinate system. The total set of equations are solved using a fourth-order Runge–Kutta–Nystrom or a third-order Adams–Bashforth method. For more information about the mathematical and numerical treatment of the equations, readers are referred to the early work of Sørensen.[1]

2.1. Aerodynamic modeling

For the solution of the system of ODEs, a blade element approach is employed in which each blade is divided into n sections along the span. In each section, the external forces and moments are calculated from airfoil data based on the local wind speed and relative velocities.

The three-dimensional edge effects are to some extent considered through the finite aspect ratio assumption of the blade, and the aerodynamic coefficients of lift and drag are calculated for all angles of attack based on flat-plate theory. The induced velocities are, however, neglected, and the Reynolds-number dependence of the airfoil data is disregarded. Once the aerodynamic coefficients are found, the lift, drag and moments on the blade fragment are computed as

$$L_i = \frac{1}{2}\rho v_i^2 A_i C_{Li}, \quad D_i = \frac{1}{2}\rho v_i^2 A_i C_{Di} \tag{5}$$

where L_i and D_i are lift and drag forces on the i-th section, ρ is the air density, v_i is the local relative airspeed, $A_i = c_i \Delta r_i$ is the local planform area where c_i and Δr_i are the local chord and the section lengths, and C_{Li} and C_{Di} are the sectional lift and drag coefficients at the desired angle of attack.

The static forces aerodynamic coefficients of the airfoil only depend on the angle of attack. Unsteady effects at high angles of attack are included by using the dynamic stall model of Øye.[18] In this model, the dynamic lift coefficient is obtained by interpolating between the lift coefficient of an airfoil in a fully attached flow and a lift coefficient of the airfoil when the flow around the airfoil is fully separated, i.e.,

$$C_{l,dyn} = f_s C_{l,inv}(\alpha) + (1 - f_s) C_{l,fs}(\alpha) \tag{6}$$

where $C_{l,inv}$ is the lift coefficient for a fully attached flow (i.e., inviscid flow assumption) and $C_{l,fs}$ is the lift coefficient for fully separated flow. The stall-changing rate is defined as

$$\frac{df_s}{dt} = \frac{f_s^{st} - f_s}{\tau} \tag{7}$$

where f_s is the time-dependent separation function, which can be thought of as the unsteady weighting function between the fully attached and the fully separated flow. f_s^{st} is a function of airfoil section,

$$f_s^{st}(\alpha) = \frac{C_{l,st}(\alpha) - C_{l,fs}(\alpha)}{C_{l,inv}(\alpha) - C_{l,fs}(\alpha)} \tag{8}$$

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Table II. Characteristics of different turbine sizes considered in the throw analyses.

Size	$L^* = \frac{l}{R}$	L (m)	m (kg)	I_x (kg·m^2)	I_y (kg·m^2)	I_z (kg·m^2)
2.3 MW $R = 45$ m, $H = 100$ m	1.0	45	7.3E+3	0.1E+7	0.1E+7	0.3E+04
	0.5	22.5	2.4E+3	0.1E+6	0.1E+6	0.40E+03
	0.2	10	4.1E+2	0.4E+04	0.4E+04	0.2E+02
5 MW $R = 68$ m, $H = 147$ m	1.0	66	2.6E+04	0.9E+07	0.9E+07	0.2E+05
	0.5	33	8.2E+03	0.1E+07	0.1E+07	0.3E+04
	0.2	14	1.7E+3	0.3E+05	0.3E+05	0.2E+03
10 MW $R = 93$ m, $H = 203$ m	1.0	93	6.2E+04	0.5E+08	0.5E+08	0.1E+06
	0.5	46.5	2.7E+04	0.6E+07	0.6E+07	0.2E+05
	0.2	20	5.3E+3	0.2E+06	0.2E+06	0.1E+04
20 MW $R = 132$ m, $H = 204$ m	1.0	132	2.6E+05	0.3E+09	0.3E+09	0.9E+06
	0.5	66	8.7E+04	0.4E+08	0.4E+08	0.1E+06
	0.2	29	1.6E+04	0.1E+07	0.1E+07	0.9E+04

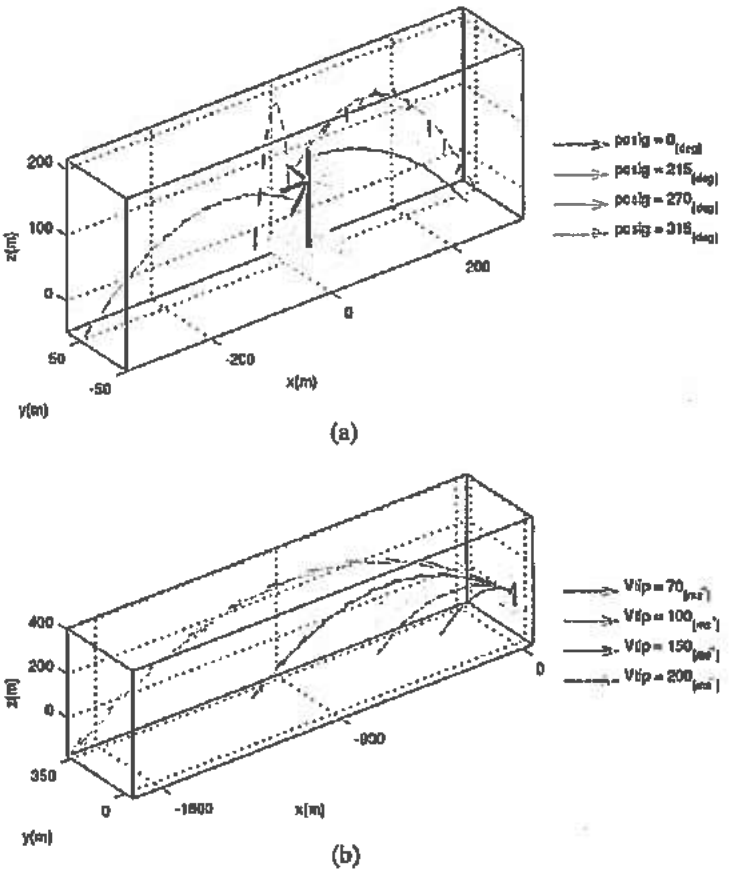

Figure 3. Schematic graphs of the throw distances for half-blade detachment changing (a) the initial release angles (upward-clockwise reference) and (b) the tip speed velocities for the 2.3 MW reference turbine.

where $\mathbf{I} = (I_x, I_y, I_z)$. In the previous relations, $S_l = 1/2$ and S_m depends on actual scaling laws when increasing the size of the rotor. From simple upscaling rules, S_m would be equal to 3 , but because of more elaborate rotor designs, this parameter is usually found to be somewhat smaller. In the present work, we employ $S_m = 2.3$ (see UpWind[20] and TPI Composites[21] for more information on turbine scaling).

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of release tip velocity. As can be seen, the release tip speed is a very important factor influencing the maximum throw distances. Normal operating conditions with $V_{tip} = 70$ m/s result in throw distances of about 500 m long, whereas a tip speed of $V_{tip} = 150$ m/s may lead to throw distances up to 2 km.

For the quantitative analysis performed in the next section, the fragments are thrown at a release angle of 45° from the horizon (225° measured upward-clockwise) in all calculations. The full-blade and blade-shell throw calculations are performed using flat-plate assumption for the aerodynamic coefficients.

Figures 4, 5 and 6 show the throw distances for three different fragments of the full blade for a combination of three blade tip speeds ($v_{tip} = 70$, 100 150 m/s) and four different incoming wind velocities (with power-law profiles) ranging between 0 and 22 m/s at hub height.

The figures are divided into three groups, the first group (Figure 4) shows the throw distances, relative to the tower position, for different incoming wind speeds (shown on the horizontal axis) and different detachment lengths at a tip speed of $V_{tip} = 70$ m/s. The detachment length L^*, shown with markers, is the length of the detached piece, measured from the blade tip and normalized by the blade length. The throw distances are calculated and plotted for the four considered wind turbine sizes ranging from 2.3 to 20 MW. As can be seen, except for the 2.3 MW machine, the effect of the incoming wind on the throw distance is almost negligible. Similarly, the effect of turbine size on the throw distance is minimal and the main

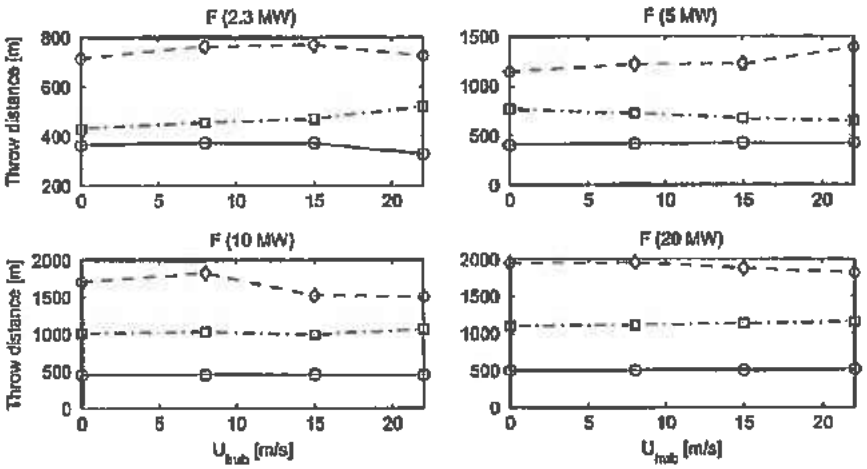

Figure 6. Throw distance calculations of full blade with three different detached lengths at an extreme tip speed of $V_{tip} = 150$ m/s. Legends are similar to those in Figure 4.

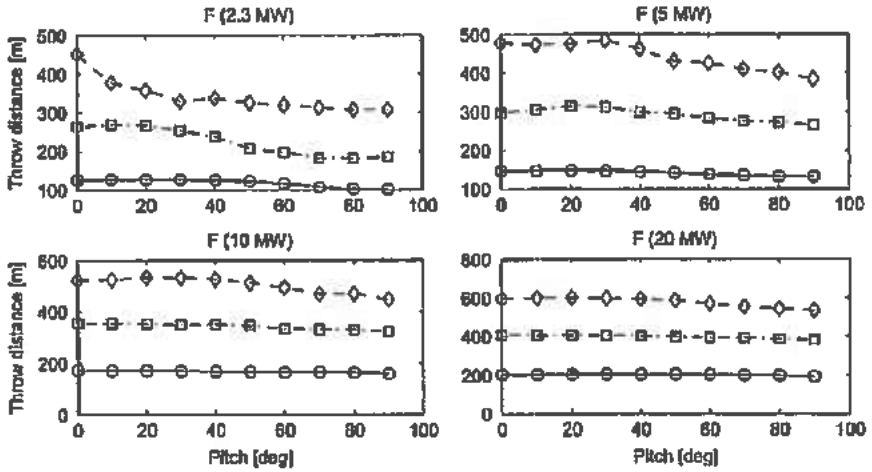

Figure 7. Sensitivity of throw distances of full blade to the initial pitch setting for 2.3, 5, 10 and 20 MW turbines operating at $V_{tip} = 70$ m/s. ◇ ◇ ◇: $L^* = 0.2$; □ □ □: $L^* = 0.5$; and o o o: $L^* = 1$.

3.2.1. Effect of initial pitch settings.

As explained earlier, analyses of the throw trajectories show that the throw distance for a particular wind turbine sometimes exhibits an erratic behavior going from one dominant solution to another with only a slight change in the initial conditions.

Table III. Aspect ratios, reference chord length C_{ref} and detached mass m of the blade shells (ρ_{shell} = 1700 kg/m^3) used for throw simulation from turbines of different sizes.

	2.3 MW		5 MW		10 MW		20 MW	
Cases — AR	C_{ref} (m)	m (kg)	C_{ref} (m)	m (kg)	C_{ref} (m)	m (kg)	C_{ref} (m)	m (kg)
AR = 1		34		83		184		408
AR = 5	1	170	1.6	415	2.1	920	3	2040
AR = 10		340		830		1840		4080

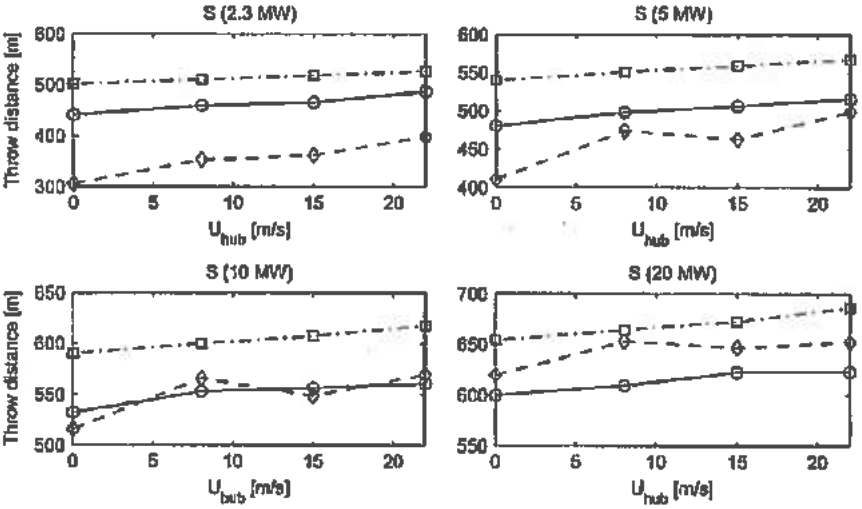

Figure 10. Throw distance calculations of blade shell with three different aspect ratios (invariant chord length for each turbine) for 2.3, 5, 10 and 20 MW turbines at a normal operating condition of V_{tip} = 70 m/s. ◇ ◇ ◇: AR = 1; □ □ □: AR = 5; and o o o: AR = 10.

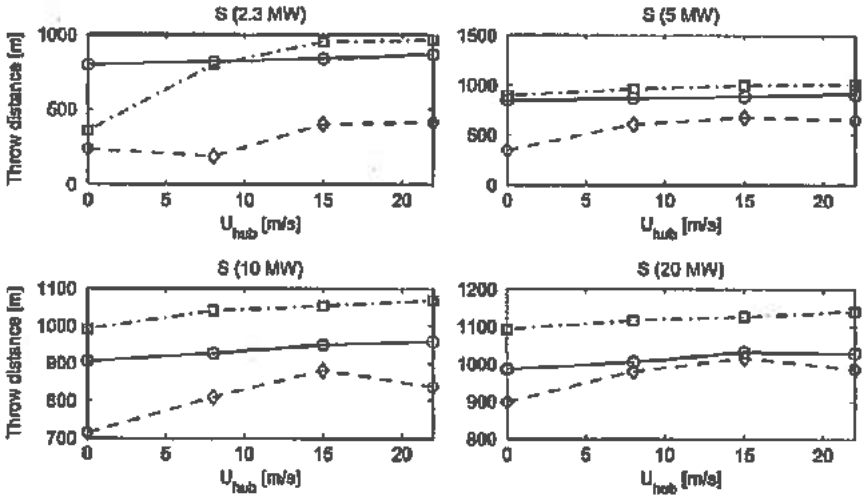

Figure 11. Throw distance calculations of blade shell at high tip speed of V_{tip} = 100 m/s. Legends are similar to those in Figure 10.

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3.3. Blade-shell throw analysis

An analysis of available data from blade failure accidents shows that depending on the manufacturing method and the structural integrity of the blade, it might first shatter into lighter parts, with the consequence that the shell layer is most likely to be thrown away. Three cases of different aspect ratios are considered for the shell throw analyses. For the reference case of 2.3 MW turbine, an average chord of 1 m and a shell thickness of 2 cm are chosen, and three aspect ratios (where AR is defined as the ratio of span to average chord) of 1, 5 and 10 are investigated. Then keeping the same AR, the analysis is repeated for each of the turbines introduced in the preceding sections. The density of the shell, consisting of fiber and glass, is assumed to be 1700 kg/m^3. Table III shows the test cases used for blade shell throw simulations.

Throw distances for the four different turbine sizes with the same working conditions as those for the full-blade case are plotted in Figures 10–12. Here, the non-dimensional length is replaced by the aspect ratio of the blade shell and three different aspect ratios are considered. As can be seen, increasing the hub-height wind speed and the turbine size generally results in larger throw distance. Nevertheless, an erratic behavior, as mentioned in the previous section, appears in the

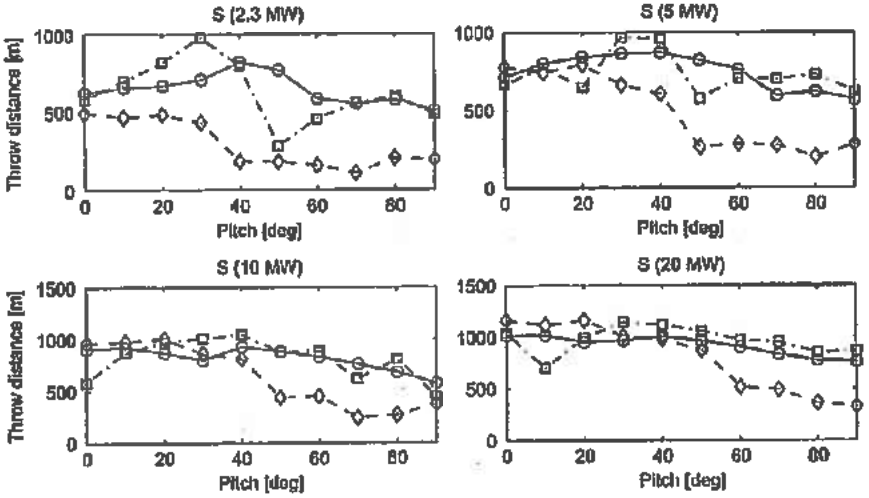

Figure 14. Sensitivity of throw distances of blade shell to the initial pitch setting at V_{tip} = 100 m/s. Legends are the same as in Figure 10.

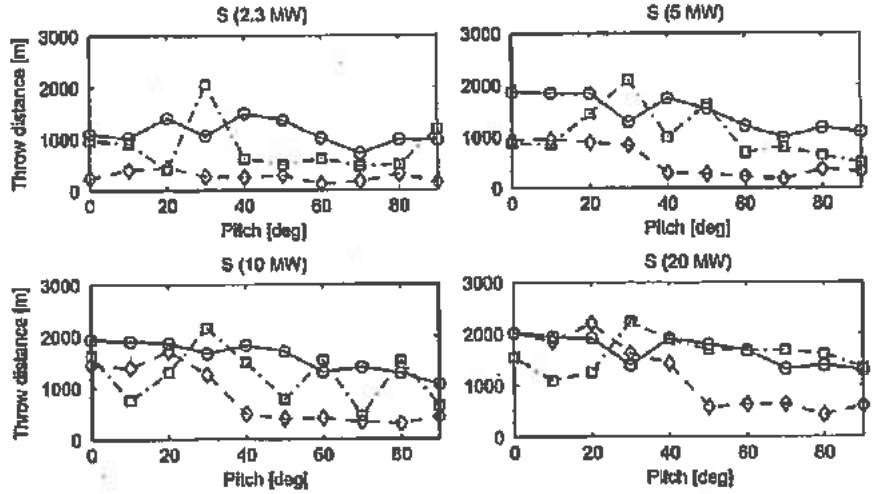

Figure 15. Sensitivity of throw distances of blade shell to the initial pitch setting at V_{tip} = 150 m/s. Legends are the same as in Figure 10.

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a density of 700 kg/m^3 is used (see also Seifert *et al.*[11]). The dimensions of the tested ice fragments and corresponding turbine sizes are shown in Table IV. According to field studies performed by, e.g., Cattin *et al.*,[22] most of the ice fragments thrown away from turbine are broken into objects that typically are smaller than 1 kg. However, fragments as heavy as up to 1.8 kg have also been observed. Because the pieces are so light, the throw distance of an ice piece is mainly governed by the drag forces applied on it (which are only functions of mass–area ratio) and the incoming wind.

Similar to the previous section, studies of the effects of different parameters on throw distances are performed and plotted in Figures 16 and 17 with the graphs structured in the same way as in the previous sections.

For the simulations, no lift is considered and the drag coefficient according to the flat-plate assumption is used. Figure 16 shows that the throw distances of the standstill case range from 30 to 100 m for different turbine sizes and incoming wind speeds. For the running conditions however, the fragments can reach distances up to 600 m. It is also clear from the figure that in many cases the aspect ratio does not play a significant role in the determination of throw distances.

3.5. Maximum throw distances

This section presents a summary of the previous results in terms of maximum throw distances. The maximum throw distances are obtained from the entire set of previous simulations regardless of the size and upcoming wind speed and plotted in Figure 18 for the full-blade and blade-shell cases and in Figure 19 for the ice-throw cases, respectively. In all

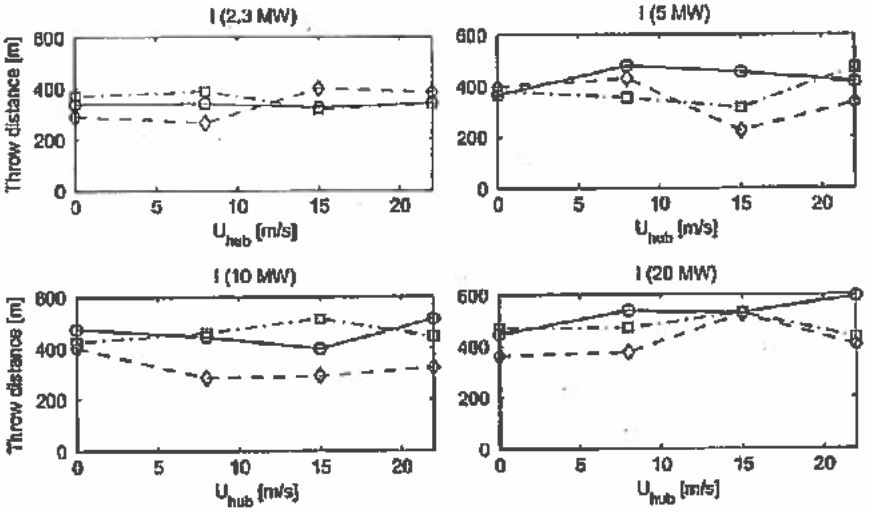

Figure 17. Throw distance calculations of ice fragments for three different aspect ratios for turbines in normal operation (V_{tip} = 70 m/s). Legends are the same as in Figure 16.

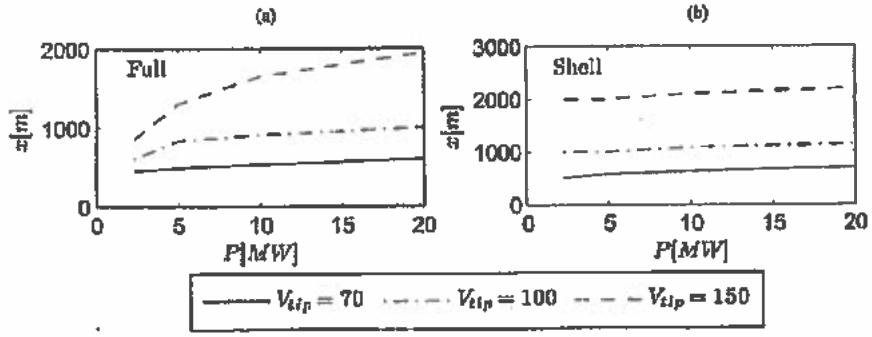

Figure 18. Maximum throw distances obtained for (a) full blade and (b) blade shell in different operating conditions. Blue line: V_{tip} = 70 m/s as a function of turbines power.

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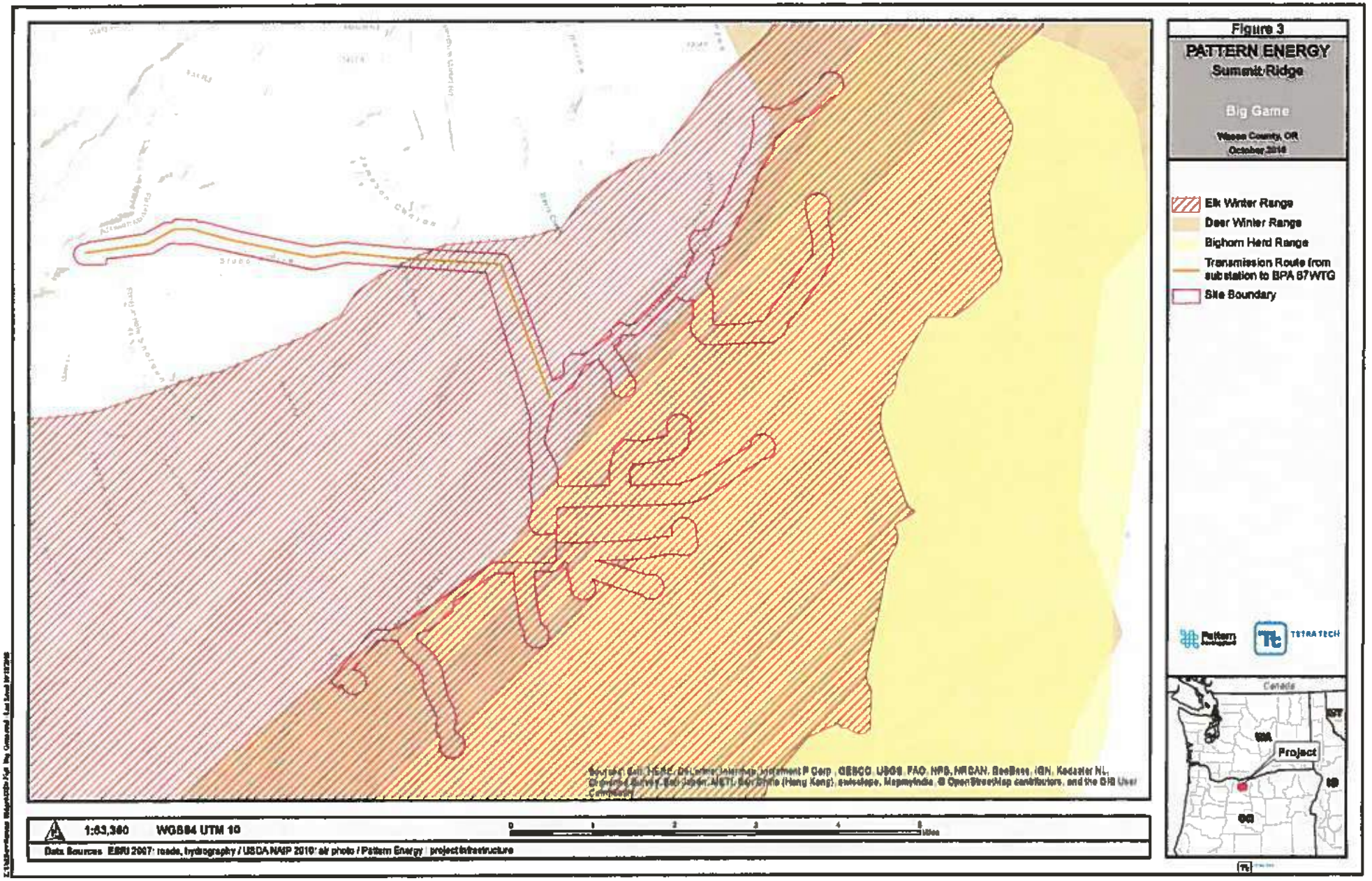
Figure 3
PATTERN ENERGY
Summit Ridge
Big Game
Wasco County, OR
October 2010
Elk Winter Range
Deer Winter Range
Bighorn Herd Range
Transmission Route from substation to BPA 67WTG
Site Boundary
Pattern
TETRA TECH
Canada
Project
1:63,360
WGS84 UTM 10
0 1 2 3 4 8 Miles
Data Sources: ESRI 2007: roads, hydrography / USDA NAIP 2010: air photo / Pattern Energy: project infrastructure

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May 31, 2010

Dear Ms. Franklin:

The Oregon Department of Fish and Wildlife (ODFW) appreciates Horizon and Western EcoSystems Technology, Inc. (WEST) providing ODFW the opportunity to review and comment on the draft Elkhorn Big Game Monitoring Study Report. Enclosed are ODFW's recommended edits and comments to this report which, if incorporated, ODFW believes would improve its content, discussion, and conclusions.

Introduction

Within the introduction, WEST indicates that ODFW's concern with the potential for displaced animals is increased crop damage. There will be areas of management complications if animals are pushed onto private agricultural lands in the valley. However, displacement of mule deer and elk from winter range will ultimately lead to population level impacts. Some of these animals will be displaced into summer range or poorer quality winter range where survival will be compromised. Therefore, ODFW recommends that the introduction be modified to include population level impact concerns associated with potential displacement of mule deer and elk from critical winter range.

Density Estimates

Page 4 includes the methodology used to estimate the density and detection probability for big game species. ODFW does not believe the methodology included clearly describes how density estimates were calculated. Therefore, ODFW recommends that the final report include additional information on methodology used to determine and analyze density estimates. Please include a definition of cluster size. Also include if all locations from two flights per year or if only one flight per year was used to estimate density. If data from two flights per year were used (data pooled), there needs to be some clarification of how density estimates were adjusted or affected by potential double sampling.

The results of the big game density analyses are presented on Pages 6-7. WEST concludes that based upon non-overlapping 90% confidence intervals (CI), significant increases in mule deer occurred between 2005 and 2008 and significant increases in elk occurred between 2005 and 2008 and 2009. This paragraph should be modified to indicate there was a significant increase in mule deer and elk density estimates, not numbers, or provide the expansion of the density estimate to the population estimate for the study area.

Mule deer counted within the big game aerial survey project area decreased from 1,560 counted in three flights (average of 520 per flight) in 2004-2005 to 1,170 counted in four flights in 2008-2009 (average of 293 per flight). Given the information provided on numbers of deer and density estimates, a discussion is needed in the final report with possible explanations for why density numbers increased as they did, even though mule deer numbers decreased. To assist with this discussion, ODFW recommends that WEST insert an additional table in the final report which includes AIC models and analyses. The final report should reference this table and include a discussion of whether or not there were competing models and if these competing models produced different results. To further clarify analyses, ODFW also recommends that Table 4b be modified to include numbers of groups and individuals per species.

Density estimates, 90% CIs, and detection probability area presented in Table 4a. The confidence intervals in 2008 and 2009 are much broader than CIs for 2004 and 2005 indicating much more variation in the density estimate. This could be due to sample sizes in 2008 and 2009. Some overlap in CIs occurs between 2005 and 2009, between 2004 and 2008 and 2009, and between 2008 and 2009. The discussion should include an assessment of how these large and overlapping CIs may affect density analyses.

Group Size

Group size information is presented on Pages 7-8. Based on the data provided to ODFW by Horizon and WEST, average mule deer group sizes included in the draft report are different than calculated by ODFW. For example average mule deer group size calculated by WEST in 2009 is 15.2 versus 17.03 calculated by ODFW. Therefore, for both ground and aerial surveys, ODFW requests that a table(s) be included in the final report summarizing number of animals and groups by species counted in each survey year.

ODFW Analysis

The final draft report provides statistics that elk and deer were located further from wind turbines and associated activities in winter 2008 and 2009 compared to the baseline of 2004 and 2005 prior to initiation of construction. Missing from the analysis was an estimate of the threshold where responses of mule deer and elk to the project were not measurable.

Horizon and WEST provided trend flight information to ODFW. Using this information, ODFW scientists Bruce Johnson and Priscilla Coe examined changes in distributions of mule deer using two methods. First, ODFW estimated core areas using pre and post

construction distributions with kernel estimators of groups of deer weighted by group size. Second, ODFW determined distances of groups (weighted by group size) in 500 m distance bands from the nearest turbine and visually inspected patterns to provide insight into shifts in distribution. ODFW then compared counts of animals within distance bands for pre and post construction periods. While this analysis provided similar trends in deer distributions presented in the final draft report where deer were further from the turbine strings, ODFW's analysis provided additional information in shifts in distributions. ODFW found that deer shifted core areas of use away from northern turbine strings, use of Ramo Flat was greatly reduced, and the core area identified in the pre construction flights on the site of the southernmost turbine string shifted further south (Figures 1, 2 and 3).

Compared to pre construction use, counts of mule deer during post construction surveys was reduced in the first seven distance bands evaluated, 0 to 500 m out to 3,000 to 3,500 m (Figure 4). This shift in distribution of mule deer is consistent with deer response to natural gas development in Wyoming (Sawyer et al. 2009[1]), where mule deer avoided liquefied gathering systems and selected areas greater than 2.6 to 4.35 km from a well pad.

Results from the Elkhorn big game study illustrate the dynamic nature of mule deer distribution and may be used to begin making predictions of how deer may respond to the development of the Antelope Ridge Wind Farm. Therefore, ODFW recommends that its analysis of changes in distribution of mule deer be included in the final report. ODFW also recommends that its analysis be the catalyst for Horizon to conduct an expanded analysis of distributions of mule deer and habitat selection that may be used to help in planning of the Antelope Ridge Wind Farm.

Additional Analysis Requests

Winter Monitoring Flights

In the draft final report, WEST's general conclusion was that deer and elk were located further from turbines following construction, but with the more severe winter weather conditions in 2008 and 2009 it was difficult to draw any conclusions. ODFW recognizes that the analysis was complicated by weather with winter weather more severe in 2008 and 2009. Unfortunately, the study was concluded in 2009 so trend flights were not conducted in 2010, which was a mild winter. ODFW believes it is in the best interest of both Horizon and ODFW to determine if mule deer habituate to the turbine strings. Therefore, ODFW recommends that WEST conduct a minimum of two additional years of winter monitoring flights to determine if mule deer habituate to the Elkhorn Valley Wind Project turbine strings and associated human activity.

Missing from the discussion of the draft final report is the decrease in mule deer numbers counted from 2004-2005 to 2008-2009. Mule deer counted within the project survey area decreased from 1,560 counted in three flights (average of 520 per flight) in 2004-2005 to 1,170 counted in four flights in 2008-2009 (average of 293 per flight). These counts indicate that deer likely shifted their distributions out of the project area.

Wind turbines are placed on ridges where wind currents are strongest and most consistent; areas in winter that would also have more bare ground and less deep snow pack because of the scouring effects of the persistent wind. Thus, one would predict that areas immediately adjacent to wind turbines prior to construction would have higher densities of deer and elk compared to areas where wind was not as strong resulting in deeper or more persistent snow pack. If there was no effect of either the turbines or human activities associated with the wind development, winter counts should be equivalent to predevelopment conditions. Because winter counts of mule deer decreased post construction, the presence of turbines and/or associated human activities likely influenced mule deer distribution.

Mule Deer Distribution and Habitat Selection

WEST indicates it is unknown if the more severe winters that occurred during Elkhorn post-construction surveys may have influenced the shift in distributions due to environmental conditions (e.g., forage and refuge opportunities) or if the presence of the wind turbines and associated human activities led to an increase in density and herd size post construction. ODFW did not have access to or attempt to link any habitat characteristics with mule deer distributions pre and post construction. From inspection of locations on digital elevation maps, it appeared deer selected for south aspects. In addition, there were some characteristics of the landscape at 1501 to 2000 m (Figure 4) that deer avoided. Therefore, ODFW requests that Horizon conduct additional analysis of data to provide information on habitat selection of mule deer in the project area. ODFW recommends that the additional analysis of mule deer distribution include covariates such as elevation, aspect, slope, habitat type, and distance to nearest turbine pad. The additional analysis could be included in the final report or a subsequent report, and could be used to help in planning of the Antelope Ridge Wind Farm (Figure 5).

Report Conclusions

Within the draft final report's conclusions, WEST indicates the number of big game animals in the survey area increased after project construction. However, mule deer counted within the project survey area decreased from 1,560 counted in three flights in 2004-2005 to 1,170 counted in four flights in 2008-2009. Given the decrease in number of groups and number of mule deer counted post construction, the final report should include a discussion of the decrease in mule deer and its conclusion should indicate that the number of mule deer in the survey area decreased after project construction.

One principal objective of this study was to recommend further studies or potential mitigation measures, if warranted. This objective is not addressed in the draft final report. Instead, the authors conclude that data regarding big game interactions with the Elkhorn Valley Wind Project are inconclusive at this point. There was a statistically significant increase in distance to turbines for mule deer and elk between pre and post construction surveys. Based on the information presented and analyses conducted, ODFW believes facility presence and human disturbance likely impacted big game distribution and habitat selection. However, it is unknown to what degree facility presence, human disturbance, or winter weather conditions may have influenced displacement responses. Therefore, ODFW recommends that its analyses be included in

this report and the additional analyses recommended by ODFW also be included in this or a subsequent report. ODFW also recommends that the discussion and conclusions in the final report be revised to include the comments and recommendations discussed in this letter.

ODFW would like to thank Horizon and WEST for providing mule deer data for our analyses. If you have questions or need additional information, please call me at (541) 962-1835 or Bruce Johnson at (541) 962-6556.

Sincerely,

Colleen Fagan

Colleen Fagan
NE Region Hydropower Coordinator

Cc: Craig Ely, ODFW La Grande
Bruce Johnson, ODFW La Grande
Jon Germond, ODFW Salem
Gary Miller, USFWS
Sue Oliver, ODOE

[1] Sawyer, Hall, M.J. Kauffman, and R.M. Nielson. 2009. Influence of Well Pad Activity on Winter Habitat Selection Patterns of Mule Deer. The Journal of Wildlife Management 73(7):1052-1060.

Mule Deer Groups in Distance Bands

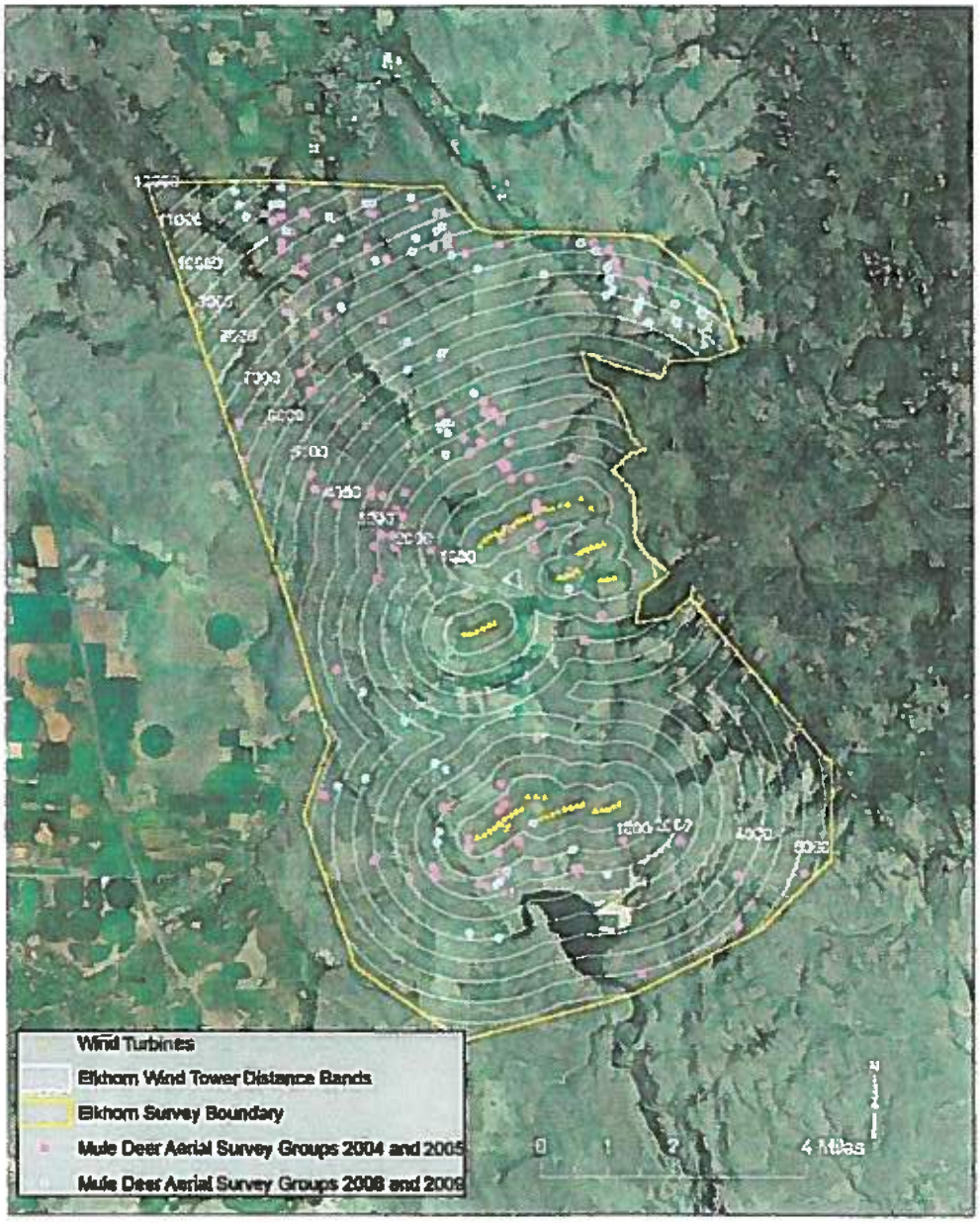

Figure 1. Locations of mule deer recorded in 3 flights prior to construction and 4 flights post construction and 500 m distance bands around turbines in the Elkhorn Valley Wind Project. The most distant band is 12000 m from the nearest turbine string.

Mule Deer Kernel Home Range Estimate 2004-2005

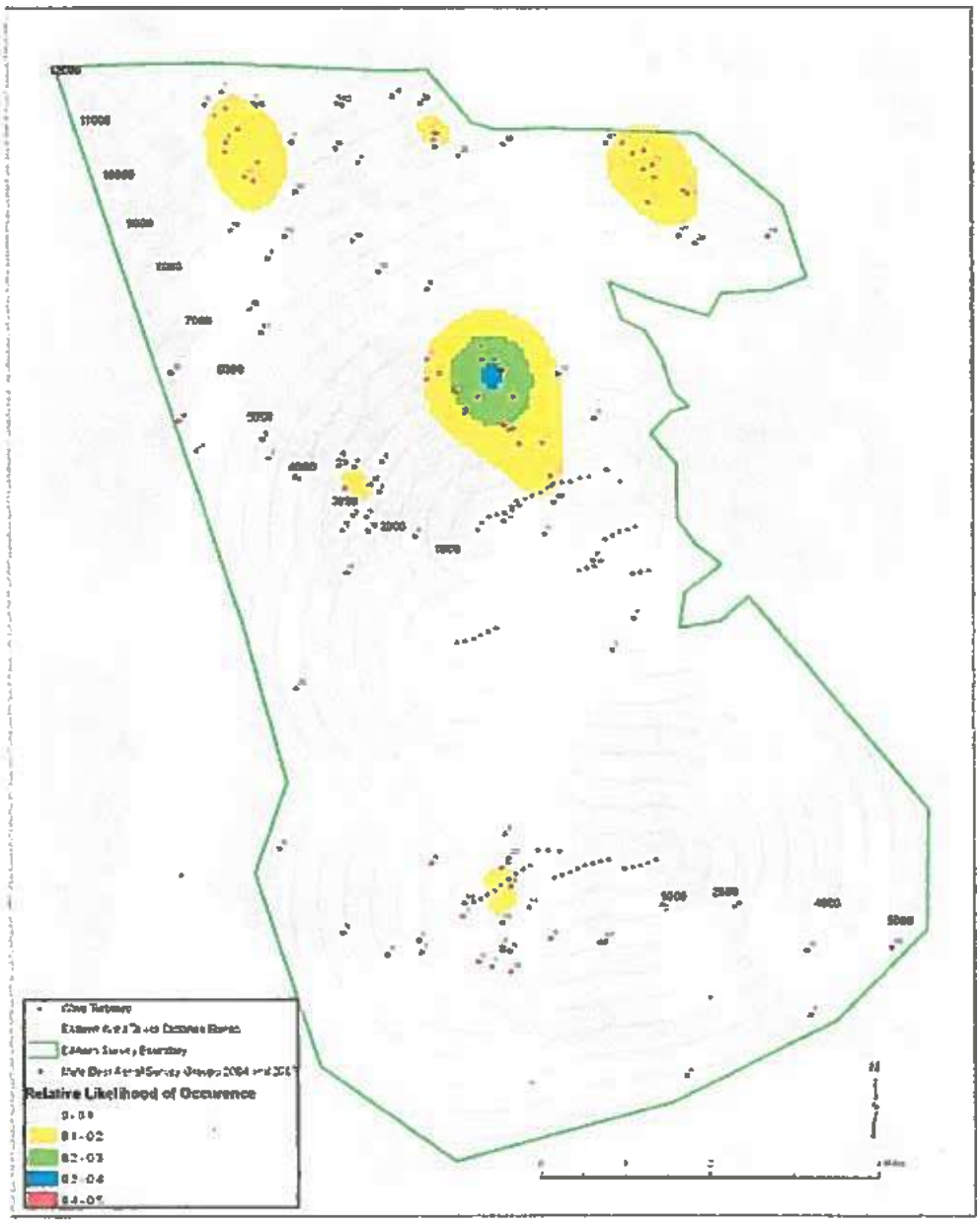

Figure 2. Distributions of mule deer during 3 flights in winter 2004 and 2005 prior to construction of the Elkhorn Valley Wind Project. Concentrations of deer are denoted by the kernel estimators, and colors indicate increasing probabilities of deer using an area.

Mule Deer Kernel Home Range Estimate 2008-2009

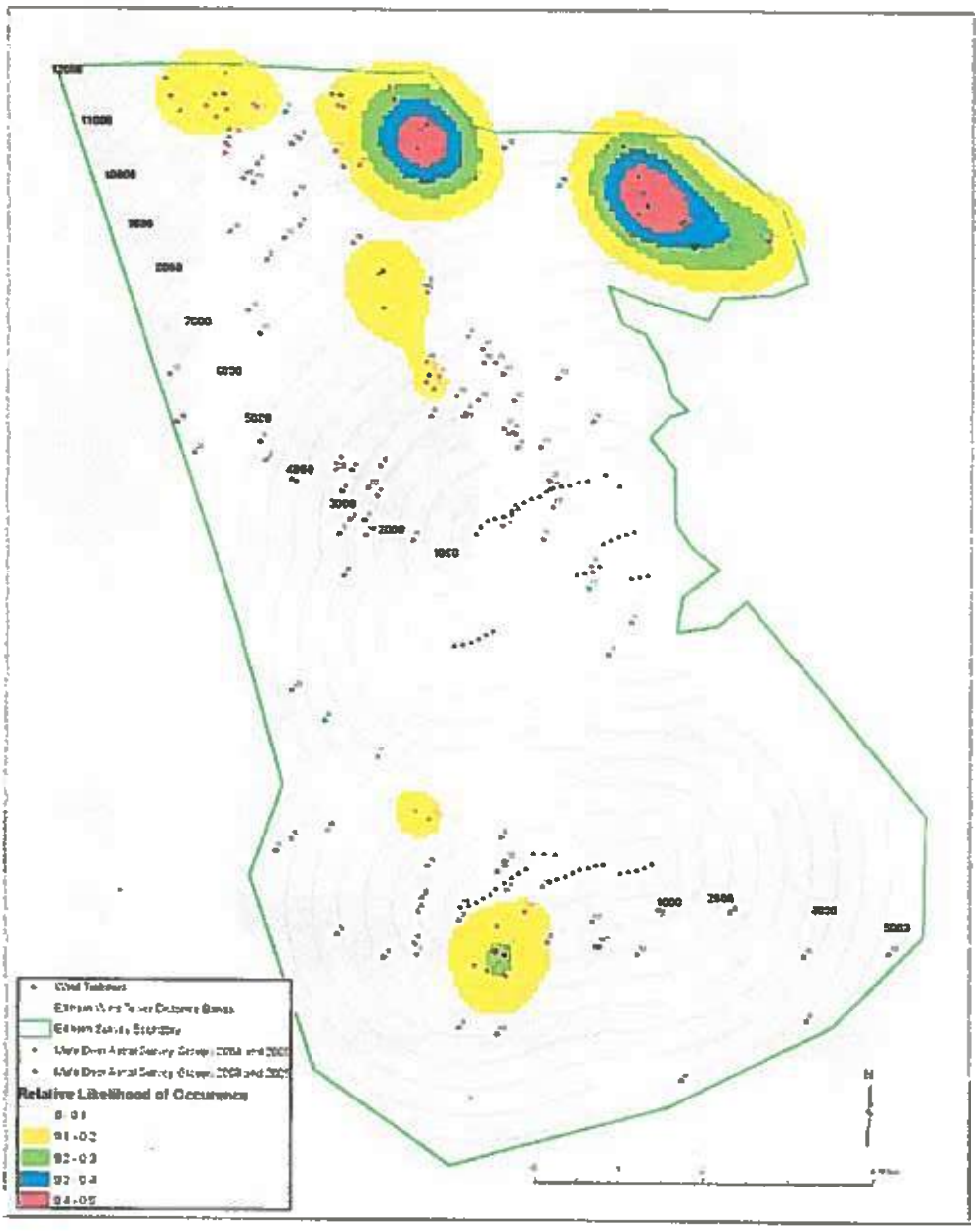

Figure 3. Distributions of mule deer during 4 flights in winter 2008 and 2009 after construction of the Elkhorn Valley Wind Project. Concentrations of deer are denoted by the kernel estimators, and colors indicate increasing probabilities of deer using an area.

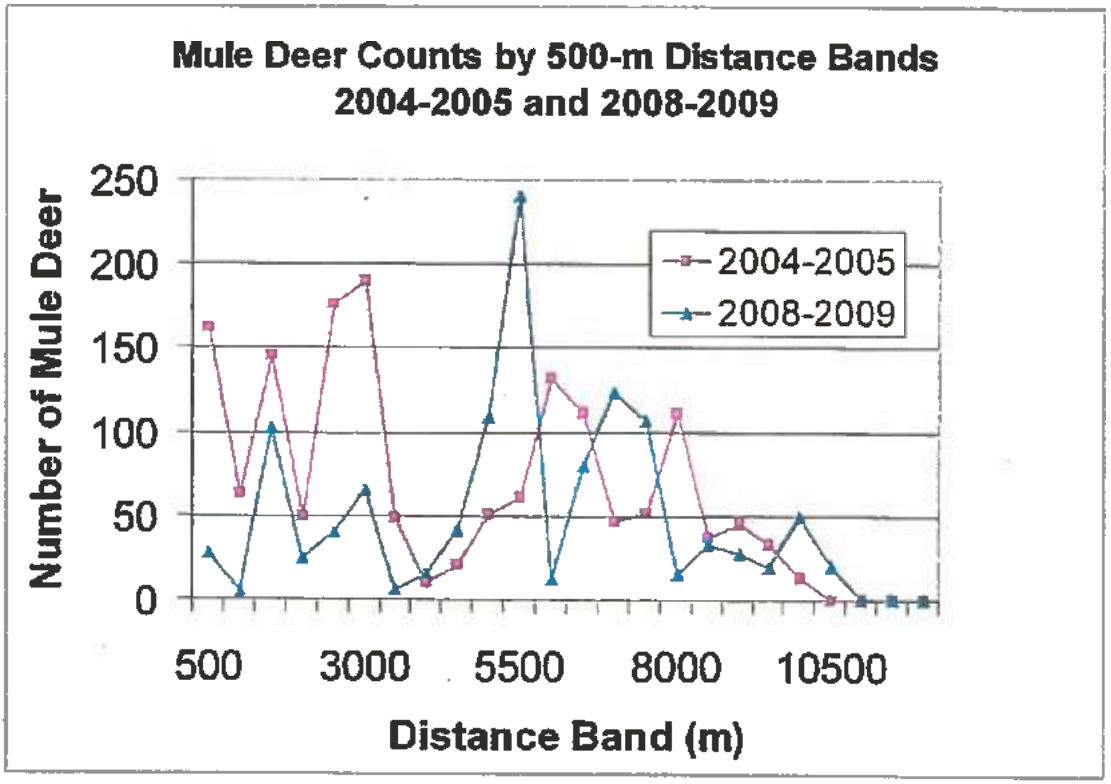

Figure 4. Counts of mule deer in 500 m distance bands from the nearest turbine from 3 pre construction (2004-2005) and 4 post construction (2008 – 2009) flights conducted within the Elkhorn Valley Wind Project.

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*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)
Date: 2/22/19 Location: Discovery center - TD
REGISTRATION FOR PUBLIC COMMENT

Name: John Nelson

Address: 524 W 3rd Pl. The Dalles

I represent (if applicable) _____
Print your name OR your organization/business name.

☒ Send me future notifications about Council meetings via email.
My email address is: joteq@gorge.net

☒ I wish to address the Energy Facility Siting Council and/or
☐ I wish to submit the following written comment:

✓ JOTEQ @ GORGE.NET

Summit Ridge Wind Project

AGENDA C

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

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*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)

Date: _____ Location: _____

REGISTRATION FOR PUBLIC COMMENT

Name: Ryan Rittenhouse

Address: 333 SW 5th Ave Portland, OR

I represent (if applicable) Friends of the Columbia Gorge

Print your name OR your organization/business name.

- ☐ Send me future notifications about Council meetings via email.
  My email address is: _____
- ☑ I wish to address the Energy Facility Siting Council and/or
- ☐ I wish to submit the following written comment:

Would like time to with Baker

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

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*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)

Date: _____ Location: _____

REGISTRATION FOR PUBLIC COMMENT

Name: JOHN SCHWARTZ

Address: 6565 Mill Creek Rd The Dalles, OR

I represent (if applicable) self

Print your name OR your organization/business name.

☐ Send me future notifications about Council meetings via email.
My email address is: _____

☑ I wish to address the Energy Facility Siting Council and/or

☐ I wish to submit the following written comment:

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PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

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ENERGY FACILITY SITING COUNCIL (EFSC)

Date: _____ Location: _____

REGISTRATION FOR PUBLIC COMMENT

Name: John Woods

Address: Hood River PO Box 1662

I represent (if applicable) Affected Oregonian

Print your name OR your organization/business name.

- ☐ Send me future notifications about Council meetings via email.
  My email address is: _____
- ☑ I wish to address the Energy Facility Siting Council and/or
- ☐ I wish to submit the following written comment:

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PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

Confederated Tribes *of the*
Umatilla Indian Reservation
Department of Natural Resources
46411 Timíne Way, Pendleton, Oregon 97801

MEMORANDUM

To: Luke May, Siting Analyst
Oregon Department of Energy
Sent via email to: luke.may@oregon.gov

From: Eric Quaempts, Department of Natural Resources Director
Confederated Tribes of the Umatilla Indian Reservation
46411 Timine Way, Pendleton, OR 97801
EricQuaempts@ctuir.org
541-276-3447

Date: February 22, 2019

RE: Confederated Tribes of the Umatilla Indian Reservation's Comments on the Summit Ridge Wind Farm Re-Issuance of Draft Proposed Order under Type A Review Path

General Comments:
Thank you for contacting the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) regarding the Summit Ridge Wind Farm. The CTUIR does not have any comments and will defer to the Confederated Tribes of the Warm Springs Reservation of Oregon.