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July 27, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Siting Senior Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018;
Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

I am an Eastern Oregonian and have traveled and recreated in the vicinity of Hilgard State Park for many years. I have concerns about the steep slopes, soils hazards, landslide risks, and erosion impacts that the construction of the Boardman to Hemingway Transmission line will pose in an already dangerous canyon.

Re: Soil Protection - Drill site 95/3 and 95/4 on unstable and steep slopes
345-022-0020

(c) ...*The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...*

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council;
effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500 kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 95/3 and 95/4 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. (sheet 3 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

95/3 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 - Angle change along alignment; Road and railroad crossing

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5, 6

“PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

Idaho Power Corporation, in Exhibit H 2.2.4 states “*The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard.*” Idaho Power Corporation admits in ASC page B-12 that “*The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes*

presenting design and construction challenges." IPCs stated original intention to the EFSC was the following: "Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line.

Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the winter storms and the spring melt can be precipitous and unpredictable.

The area surrounding the drill site 95/3 and 95/4 is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

Conclusion and Requested Relief:

Drill site 95/3 and 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002 should be removed for consideration as a site for a transmission "facility." While Idaho Power Corporation attempts to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.

Sincerely,



Signature



Printed Name:

Mailing Address:

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

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Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; Soil Protection

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

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Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

RECEIVED

AUG 12 2019

DEPARTMENT OF ENERGY

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's stated timber values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include the value of any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant claims that the value of the land in the right of way will not be significantly reduced due to the owner's opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive.

It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for ¼ mile (1,320 ft.)

of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing ¼ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence. In other words, the cost of fencing an acre of lost forest land would exceed the value the applicant claims the land would add to the local economy per acre for the 50 years the transmission line is predicted to be in place.

The applicant also claims that the transmission line right of way through forest lands will not cause a substantial change in accepted forest practices or cause a significant increase in the cost of accepted forest practices on lands to be directly impacted by the Project or on surrounding lands. Removing trees from land currently being used to grow them certainly will create a substantial change in accepted forest practices. It also will substantially increase the costs of growing and harvesting trees on the surrounding lands. Soil compacted by heavy equipment used to access the line will discourage regrowth.

The transmission line will make it impossible to use aerial equipment to harvest trees on steep hillsides adjacent to the line; it will increase costs of harvest due to the need to avoid equipment contact with the transmission lines, avoid trees falling on the transmission lines, require new access and egress from the forested lands that avoid having log trucks and equipment moving below the transmission line, It will decrease the harvest along the transmission line due to tree loss along the corridor from wind and weather conditions impacting weakened root infrastructure once the transmission corridor is cleared.

Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming from that activity, but there will be related losses to the productivity of adjacent land, increased costs of harvesting along the transmission line, introduction of noxious weeds, increased risk of wildfire, potential increase in the number of trespassers, interference with wildlife activities including displacement of wildlife to what may be less desirable habitat, opening the area up to increased predation on the multiple non-raptor species utilizing the forested areas, decreased value of land if it is sold, long-term reduction in assessed value of the land, etc. The conclusions stated by the applicant in section 8.0 are false, absolutely without merit.

In addition, the applicant has failed to provide documentation to support their conclusions. The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Therefore, the Council should DENY the application for site certificate.

Fred M. Arnst

Fred M. Arnst

Signature

Printed Name

506 Main Ave. La Grande, OR 97850

Mailing Address:

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

APPLICANT FAILED TO INCLUDE ALL REQUIRED SOURCES OF NOISE IN THEIR MODELING OF NOISE IMPACTS OF DEVELOPMENT

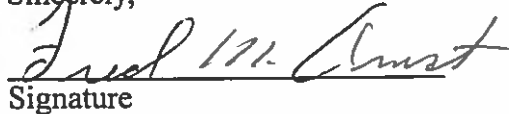
Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (l) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement."

The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

The application is incomplete. Without having the information regarding these additional noise sources, the department and the siting council lack the information regarding how many noise sensitive properties are impacted and by how much.

A proposed order cannot be issued until the developer submits all the information regarding the noise impacts of this development. This information must be available to decide if the standard is met or if it can be met with additional site conditions.

Sincerely,



Signature

Printed Name:

Mailing Address:

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.

Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,

Fred M. Anst

Name: Fred M. Anst

Address: 506 Main
LaGrande, OR 97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

The application is incomplete as Section X must include information regarding all receptors within ½ mile of site and include all noise sources required to be included in establishing the noise level generated directly or indirectly by the development. Idaho Power has not provided information adequate to determine if they are able to meet the noise standard, even with site certificate conditions.

IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within ½ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, it's related or supporting facilities, all temporary laydown and staging areas and all corridors and micro-siting corridors proposed by the applicant" (OAR 345-001-0010(55)).

1. The applicant lists the areas which are included in the site boundary in Exhibit F, Page F-2, however, they failed to include noise modeling or include all the receptors within the ½ mile area beyond the entire site perimeter.
2. The applicant failed to do noise modeling for all noise sensitive property as they did not include churches, schools, libraries, or hospitals as is required by the definition in OAR 340-035-0015(38).
3. The applicant also failed to include the noise identified in OAR 340-035-0035(1)(b)(B)(ii) as not being exempt from the ambient statistical noise level indirectly caused by or attributable to that source including all its related activities. This section states, "Sources exempted from the requirements of section (1) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement." The application is not complete prior to the applicant finishing Exhibit X to include all sources required by this rule as

well as all receptors within ½ mile of the entire site boundary. No decisions can be made absent an accurate accounting of the predicted noise impacts which has not occurred.

No Proposed Order can be issued until the developer has shown that they meet the requirements at the time a site certificate is issued. OAR 345-015-0190(5) allows the Department to find the application is complete when the applicant has submitted information adequate for the Council to make findings or impose conditions on all applicable Council standards. While not all information required by OAR 345-021-0000 and 0010 must be submitted, there must be information adequate to show they meet the requirements or will meet them by implementing the conditions contained in the site certificate. The draft site certificate does not assure that the noise standard will not be exceeded, and the developer has not provided noise modeling or included modeling for all required sources of noise to establish the ambient statistical noise level of the development for all NSR's. Missing information includes: 1. Identification of all noise sensitive receptors within ½ mile of the entire site boundary; 2. Identification and notice to the owners of all noise sensitive properties; and 3. Modeling which includes Items (5)(b) - (f), (j), and (k) which cannot be excluded from the ambient noise measurement.

Sincerely,



Signature

Printed Name: Fred M. Arust

Mailing Address: 506 Main LaGrande OR 97850

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

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Phyllis J Arnst

Name: *Phyllis J Arnst*

Address: *506 Main Ave
LaGrande OR 97850*

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
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Some forest facts related to this section:

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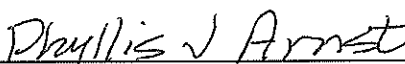
In addition, the applicant has failed to provide documentation to support their conclusions. The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Therefore, the Council should DENY the application for site certificate.


Signature


Printed Name

Mailing Address: 506 Main Ave
LaGrande OR 97650

July 27, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Siting Senior Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018;
Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

I am an Eastern Oregonian and have traveled and recreated in the vicinity of Hilgard State Park for many years. I have concerns about the steep slopes, soils hazards, landslide risks, and erosion impacts that the construction of the Boardman to Hemingway Transmission line will pose in an already dangerous canyon.

Re: Soil Protection - **Drill site 95/3 and 95/4 on unstable and steep slopes**
345-022-0020

(c) ...The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council;
effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500 kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 95/3 and 95/4 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. (sheet 3 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

95/3 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 - Angle change along alignment; Road and railroad crossing

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5, 6

“PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

Idaho Power Corporation, in Exhibit H 2.2.4 states “*The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard.*” Idaho Power Corporation admits in ASC page B-12 that “*The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes*

presenting design and construction challenges.” IPCs stated original intention to the EFSC was the following: “Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line.

Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the winter storms and the spring melt can be precipitous and unpredictable.

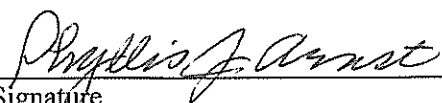
The area surrounding the drill site **95/3 and 95/4** is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

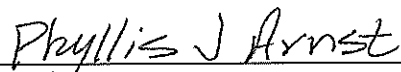
Conclusion and Requested Relief:

Drill site 95/3 and 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002 should be removed for consideration as a site for a transmission “facility.” While Idaho Power Corporation attempts to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.

Sincerely,


Signature


Printed Name:

Mailing Address: *506 Main Ave
LaGrande OR 97850*

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; Soil Protection

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

APPLICANT FAILED TO INCLUDE ALL REQUIRED SOURCES OF NOISE IN THEIR MODELING OF NOISE IMPACTS OF DEVELOPMENT

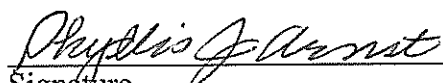
Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (l) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement."

The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

The application is incomplete. Without having the information regarding these additional noise sources, the department and the siting council lack the information regarding how many noise sensitive properties are impacted and by how much.

A proposed order cannot be issued until the developer submits all the information regarding the noise impacts of this development. This information must be available to decide if the standard is met or if it can be met with additional site conditions.

Sincerely,


Signature

Printed Name: Phyllis J Arnst
Mailing Address: 506 Main Ave
LaGrande OR 97650

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

The application is incomplete as Section X must include information regarding all receptors within ½ mile of site and include all noise sources required to be included in establishing the noise level generated directly or indirectly by the development. Idaho Power has not provided information adequate to determine if they are able to meet the noise standard, even with site certificate conditions.

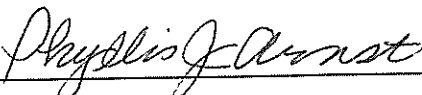
IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within ½ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, it's related or supporting facilities, all temporary laydown and staging areas and all corridors and micro-siting corridors proposed by the applicant" (OAR 345-001-0010(55)).

1. The applicant lists the areas which are included in the site boundary in Exhibit F, Page F-2, however, they failed to include noise modeling or include all the receptors within the ½ mile area beyond the entire site perimeter.
2. The applicant failed to do noise modeling for all noise sensitive property as they did not include churches, schools, libraries, or hospitals as is required by the definition in OAR 340-035-0015(38).
3. The applicant also failed to include the noise identified in OAR 340-035-0035(1)(b)(B)(ii) as not being exempt from the ambient statistical noise level indirectly caused by or attributable to that source including all its related activities. This section states, "Sources exempted from the requirements of section (1) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement." The application is not complete prior to the applicant finishing Exhibit X to include all sources required by this rule as

well as all receptors within ½ mile of the entire site boundary. No decisions can be made absent an accurate accounting of the predicted noise impacts which has not occurred.

No Proposed Order can be issued until the developer has shown that they meet the requirements at the time a site certificate is issued. OAR 345-015-0190(5) allows the Department to find the application is complete when the applicant has submitted information adequate for the Council to make findings or impose conditions on all applicable Council standards. While not all information required by OAR 345-021-0000 and 0010 must be submitted, there must be information adequate to show they meet the requirements or will meet them by implementing the conditions contained in the site certificate. The draft site certificate does not assure that the noise standard will not be exceeded, and the developer has not provided noise modeling or included modeling for all required sources of noise to establish the ambient statistical noise level of the development for all NSR's. Missing information includes: 1. Identification of all noise sensitive receptors within ½ mile of the entire site boundary; 2. Identification and notice to the owners of all noise sensitive properties; and 3. Modeling which includes Items (5)(b) - (f), (j), and (k) which cannot be excluded from the ambient noise measurement.

Sincerely,


Signature

Printed Name: Phyllis J Arnst

Mailing Address: 506 Main Ave
LaGrande OR 97850

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" ¹ specifically the Modelaire-Hawthorne Loop) ², hereafter referred to as the "loop", of La Grande to access the site entrance. This residential "loop" was constructed without sidewalks for a new development around the early 1960s.

According to OAR 345-022-0110, Public Services (pg. 5. April 2017) "The applicant...must address all permanent and temporary impacts of the facility on housing, traffic, safety, police and fire protection, health care and schools." ³

My impression from reviewing the application Page 17 ⁴ is that the applicant has not fully examined the final portion of the intended route nor does it fully recognize or address the need for traffic mitigation. This "loop" is the only access to/from thirty-six houses to the rest of the city. The area to the north of the "loop" is occupied by the Grande Ronde Hospital and Medical Clinic. Two blocks to the east is located the local high school and a grade school. ²

In June of 2016, the Grande Ronde Hospital petitioned the City to have a conditional use for a parking lot expansion project next to Hawthorne. The Conditional Use Permit was approved subject to the Condition of Approval that "No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to residential standards and is not designed to support commercial traffic." ⁵

The La Grande Director of Public Works, Kyle Carpenter, provided information regarding the widths for the streets in question. The two streets range from 33 feet to 37 feet in width with no sidewalks. I personally measured the area where the unpaved stem of Hawthorne leaves the "loop" to go up the hill. At the junction it measures 32 feet curb cut to curb cut and narrows to 18-21 feet in width as it goes around the corner up the hill. 6 The Public Works Director also provided pictures of the mapping system showing the existing utilities located in the "loop". 7-8. It should also be noted that from the entrance to the "loop" at Sunset Drive to the entrance of the site the road has a 16% grade.

Attachment U2 9 from the application shows an "Aerial Lift Crane to be Used During Construction" and the Transportation and Traffic Plan on page 19 10 lists a number of other vehicles anticipated to be used. Article 6.6 — Public Street Standards for the City of La Grande Section 6.6.002 states that "Collector Streets are designed to withstand normal trucks of an HS20 loading. Larger trucks are to utilize Arterial Streets where at all possible." 11 The majority of vehicles listed on page 19 exceed that limit and would be using a Local Street in addition to Arterial and Collector Streets. According to the Public Works Director the two streets in the "loop" were designed as Local Streets for residential use, able to accept the pressures of HS20 for the purpose of an occasional need such as a weekly garbage truck or an emergency vehicle but for no more than 5% of the time. The paving construction of these over 50 year old streets in the "loop" was not designed for repetitive use by vehicles heavier than a normal car. These streets in the "loop" have not been repaved, only patched when necessary, since they were first constructed.

The application does not address the "loop" specifically, but 3.1.2 (pg. 19) 10 and Table 6 (pg.17) 12 of the Transportation and Traffic Plan indicate there would be numerous vehicles using this route. Not knowing exactly just which vehicles would be on the "loop" daily but making a conservative estimate of 50 round trips (100 single) it would be a constant parade with one truck every 7.2 minutes. This is unacceptable for numerous reasons including constant excessive noise.

Not only would weight of the vehicles be a problem but the narrowness of the "loop" streets and the ninety degree blind curves that would have to be executed would be either impossible or extremely dangerous considering the turning radius for many of these large vehicles. The

already dangerous situation for a number of driveways that exit onto these "loop" streets at blind curves would be exacerbated. 13-14

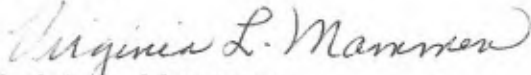
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for walking (children to school, all ages for physical training), driving, or biking. I fear there are standards that are either not being considered or they are intentionally being ignored. There should be some common sense, courtesy and respect for the impact this project would impose on any neighborhood.

Finally, La Grande Ordinance Number 3077, which adopted Oregon State Traffic Laws by reference, states in Section 17 page 8 "It shall be unlawful for any person, firm or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes." Neither Modelaire/Hawthorne Loop nor Sunset Drive are posted as truck routes. 15-16

A site review and traffic plan must be completed prior to the cite certificate being issued and not 90 days prior to construction as stated.

For the above reasons I oppose the usage of the proposed route for the construction of the B2H transmission line.

Sincerely,


Virginia L. Mammen
405 Balsa
La Grande, Oregon. 97850

gmammen@eoni.com

**TABLE 1
 STREET STANDARDS**

Functional Classification	ADT Volume	Speed (mph)	# of Travel Lanes	Travel Lane Width	Turn Lane or Median Width	Bike Lanes	Min. Bike Lane Width	On-Street parking
Downtown Arterial	10,000	20	2-3	11'	11'			both sides
Arterial	10,000	40-55	2-5	12'	4-14'	optional ⁴	5'	none
Major Collector	2,000 - 10,000	25-45	2-3	11'	12'	required	5'	one or both sides
Minor Collector	1,000 - 2,000	25-35	2	11'	none	Optional ⁵	5'	one or both sides
Local Street	0 - 1,000	15-25	2	10'	none	none	none	one or both sides

Functional Classification	Sidewalks	Min. Sidewalk Width	Planting Strip Width ¹	Total Paved Width ²	Total ROW Width ³	Private Access Spacing
Downtown Arterial	required	12'	3'6" ⁶	49'	80'	200'
Arterial	required	5'	8'	36'-72'	80'-102'	200' - 400'
Major Collector	required	5'	8'	52'-60'	62'-90'	150' - 300'
Minor Collector	required	5'	8'	30'-48'	60'-78'	75' - 150'
Local Street	required	5'	8'	28'-36'	40'-66'	Each Lot

¹ A portion of the required planting strip width may be used instead as additional sidewalk width or reduced right of way, as appropriate.

² The minimum of the paved width was calculated with the following assumptions:

Arterials: Two (2) travel lanes, four foot (4') median divider, no center turn lane, no bike lanes.

Major Collectors: Two (2) travel lanes, two (2) bike lanes, no center turn lane, parking on one (1) side.

Minor Collectors: Two (2) travel lanes, parking on one (1) side of street, no bike lanes.

Local Streets: Two (2) travel lanes, parking on one (1) side of street.

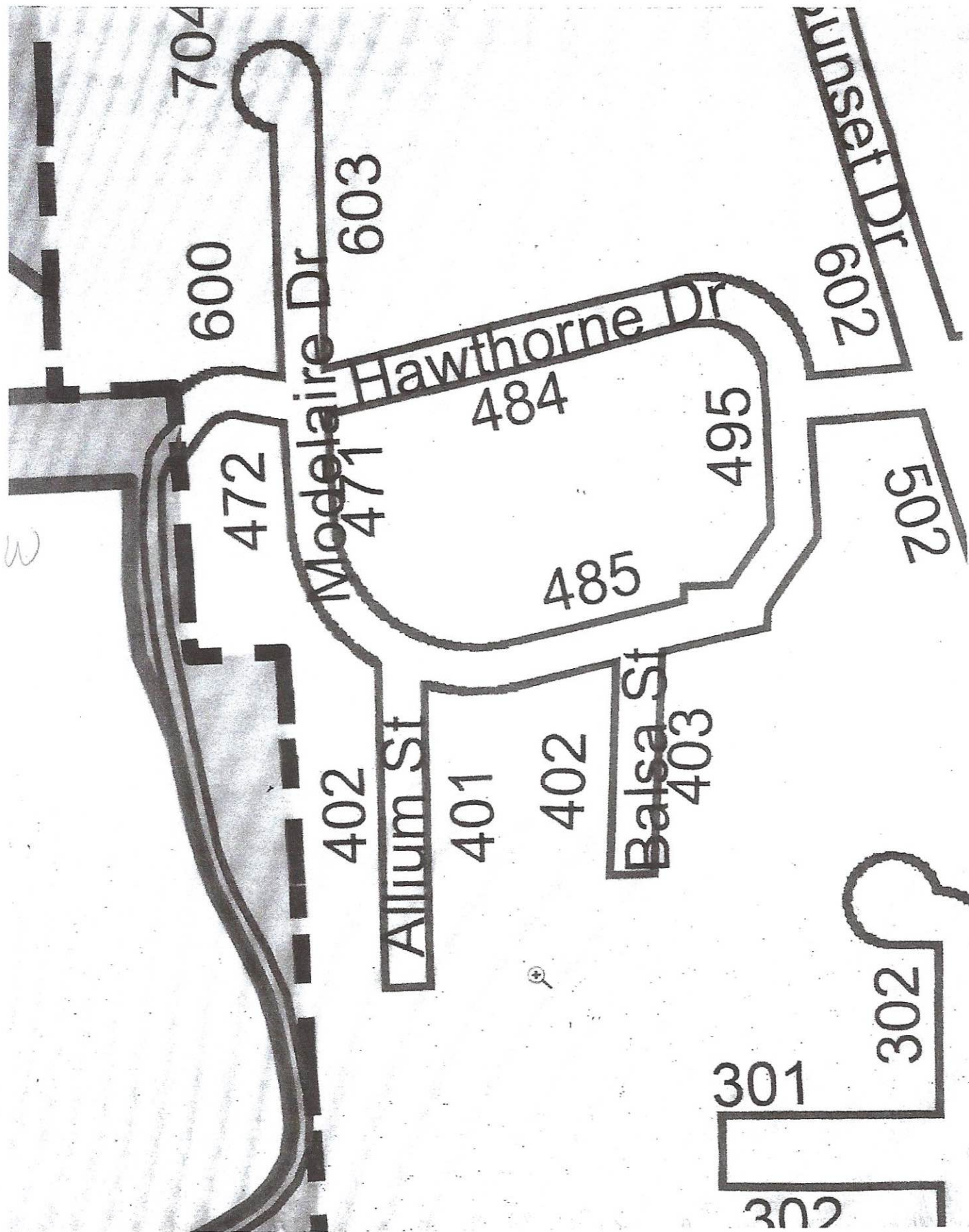
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

³ These right-of-way width ranges are for new streets.

⁴ Bike lanes should be provided on Arterials unless more desirable parallel facilities are designated and designed to accommodate bicycles.

⁵ Bike lanes should be provided on Minor Collectors where traffic volumes or other factors warrant. Otherwise, Minor Collectors should be designed and designated as shared roadway facilities with wide outside travel lanes of 14' on important bike routes.

N



5

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety. Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



Idaho Power Responses to Comments and Requests for Additional Information on the B2H APASC
from the City of La Grande
Compiled by ODOE. RAI's from the City of La Grande and Responses from IPC

		proposed helipad is a necessary supporting facility.	
U	U- Public Services include utilities such as road systems, water, sanitation services, power, and other amenities necessary for the construction.	Ordinance #2912, Series 1997 gives the City jurisdiction and control on all City street rights-of-way and Ordinance #3077, Series 2009, establishes the process and requirements for permits and licenses for uses of the streets that are not normal uses and may result in damages.	<p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p> <p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><u>Land Use Condition 9: Prior to construction in Union County, the site certificate holder shall complete the following to address traffic impacts in the county:</u></p> <p><u>a. The site certificate holder shall finalize, and submit to the department for its approval, a final county-specific transportation and traffic plan. The protective measures described in the draft Transportation and Traffic Plan in ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</u></p> <p><u>b. The site certificate holder shall work with the Union County Road Department and the City of La Grande Public Works Department to identify concerns related to Project construction traffic; and</u></p> <p><u>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</u></p> <p><u>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</u></p>

IV. CONCLUSIONS

Based on the Findings of Fact above, the Planning Commission concludes that the application meets the requirements established in LDC Articles 8.5 and other applicable codes and Ordinances.

V. ORDER AND CONDITIONS OF APPROVAL

Based on the conclusions above, the Planning Commission approves the Conditional Use Permit as requested, subject to the following Conditions of Approval:

1. No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to a residential standards and is not designed to support commercial traffic.
2. Any existing driveway curb cuts along Hawthorn Drive bordering GRH's property, that are not used for residential purposes, shall be removed and replaced with City standard improvements that exists adjacent to such areas.
3. There is a storm sewer line extending through the project area that shall to be protected. Any improvements that may affect the storm sewer line shall be reviewed and approved by the Public Works Director.

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

1. **Revisions to a Valid Conditional Use Permit:** Any variations, alterations, or changes in a valid Conditional Use Permit requested by the deed holder shall be considered in accordance with the procedures of the Land Development Code as though a new Conditional Use Permit were being applied for.
2. **Public Works Standards:** Where a development involves work within the public right-of-way, a Right-of-Way Permit shall be obtained from the Public Works Department in advance of commencing with any work in the right-of-way. All improvements within the public right-of-way shall be in conformance with the most recent adopted City of La Grande "Engineering Standard Drawings and Specifications for Construction Manual."
3. **Building Permits:** The City of La Grande Building Department shall be contacted early in the process and in advance of development to coordinate and obtain required building, plumbing, electrical and/or mechanical permits. All required permits shall be acquired in advance of construction.

VI. OTHER PERMITS AND RESTRICTIONS

The applicant and property owner is herein advised that the use of the property involved in this application may require additional permits from the City of La Grande or other local, State or Federal Agencies.

The City of La Grande land use review, approval process and any decision issued does not take the place of, or relieve the applicant of responsibility for acquiring such other permits, or satisfy any restrictions or conditions thereon. The land use decision herein does not remove, alter, or impair in any way the covenants or restrictions imposed on this property by deed or other instrument.

The land use approvals granted by this decision shall be effective only when the rights granted herein have been exercised and commenced within one (1) year of the effective date of the decision. In case such right has not been exercised and commenced or an extension obtained, the approvals granted by this decision shall become null and void. A written request for an extension of time shall be filed with the Planning Department at least thirty (30) days prior to the expiration date of the approval.



Virginia Mammen <4gmammen@gmail.com>

Modelaire Roadway Specifications

3 messages

Kyle Carpenter <KCarpenter@cityoflagrande.org>
To: "gmammen@eoni.com" <gmammen@eoni.com>

Fri, Jul 12, 2019 at 1:51 PM

I have attached a couple pictures of our mapping system that will give you a sense of where existing utilities are in Modelaire and Hawthorne. As for the widths of the roadways, I took measurements in multiple places, and found the following:

- Modelaire Drive (F Avenue) between Sunset Blvd and Hawthorne Drive is approximately 33 feet wide with a grade of about 5 Percent.
- Hawthorne Drive is approximately 32 feet wide at the bottom near the intersection of Modelaire/F Avenue and widens to about 34 feet where it intersects Modelaire at the top of the hill. The grade heading up hill is approximately 15.5 Percent.
- Modelaire Drive is generally 36 feet wide with some minor variability generally less than a foot (35' to 37'). On the southernmost segment of the roadway where the majority of the elevation gain is observed the grade is approximately 16 Percent.

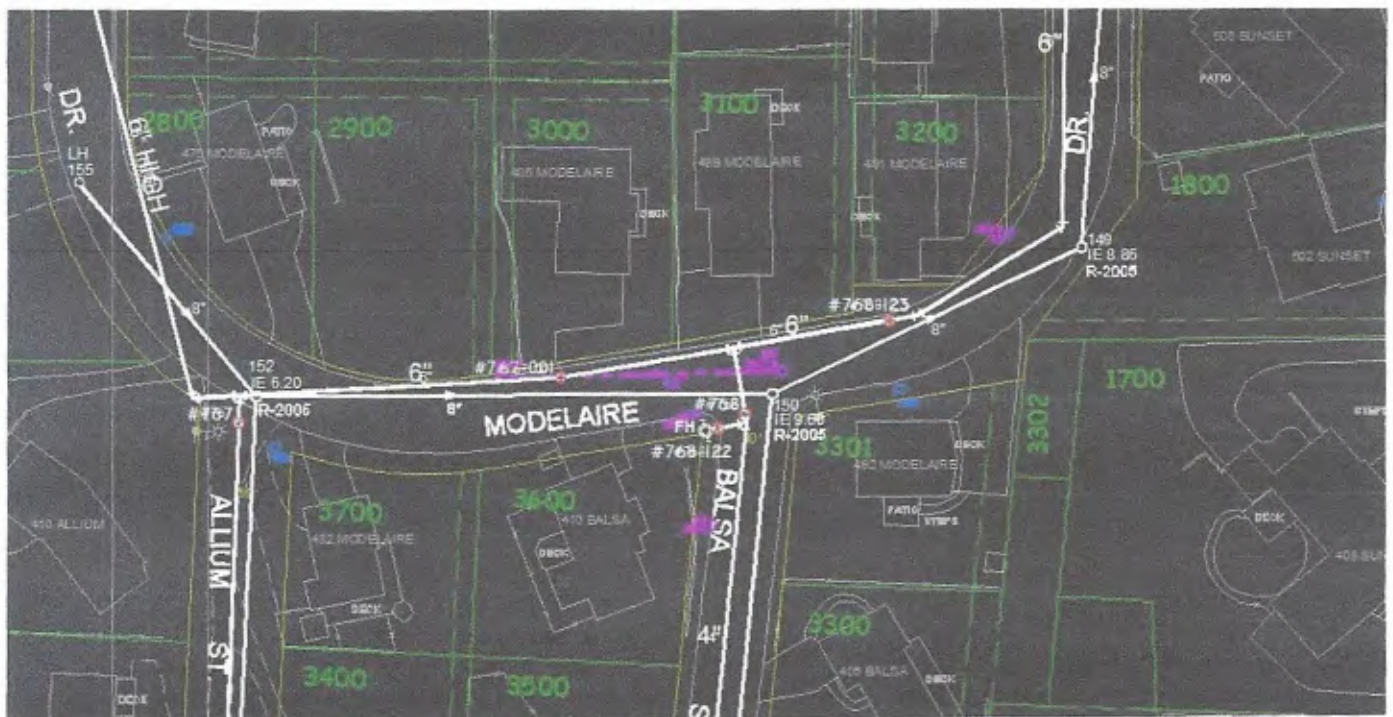
Let me know if there are any other specifications of these roadways that you are interested in that I have missed. Have a great weekend and thanks for the treats, the guys were very appreciative.

Kyle Carpenter, PE
Public Works Director
City of La Grande
Public Works
Ph: (541) 962-1325
Fax: (541) 963-4844

2 attachments

Hawthorne.jpg
150K

Modelaire.jpg
120K





attachment U2

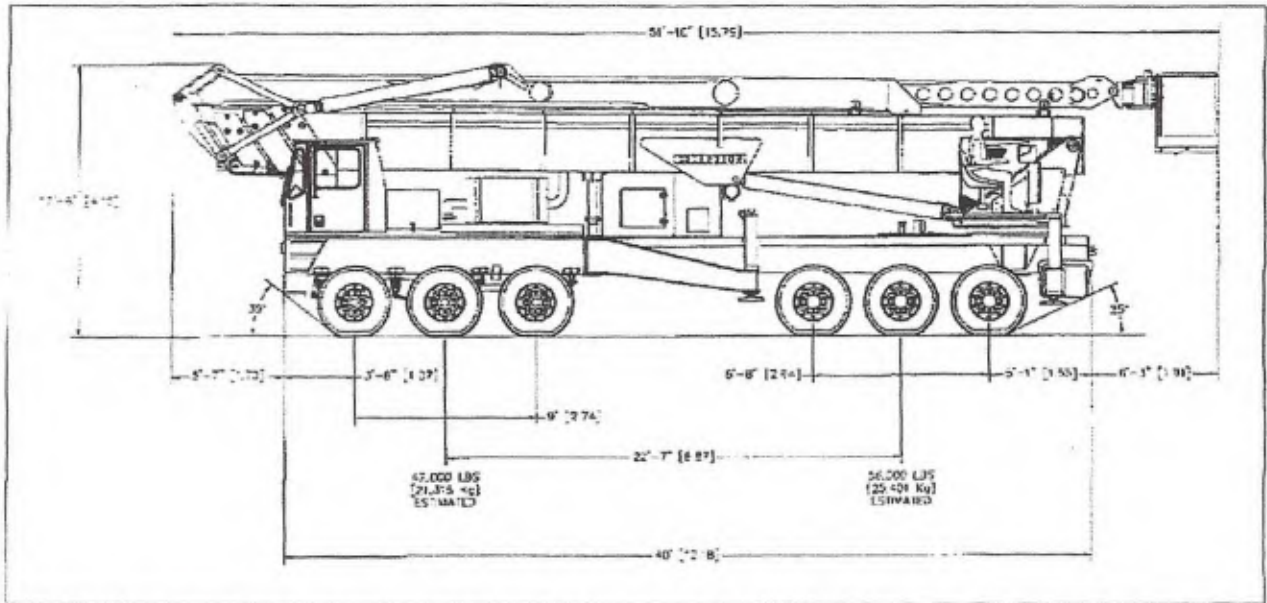


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

The following is a summary of anticipated equipment to be used for each transmission-line construction activity.

- Survey work: pickup trucks or ATVs.
- Timber removal: pickup trucks, feller bunchers, dump trucks, wood chippers.
- Road construction: pickup trucks, bulldozers, motor graders, and water trucks.
- Hole digging, installation of directly embedded structures, or foundation installation: pickup trucks, 2-ton trucks, digger derrick trucks, hole diggers, bulldozers, concrete trucks, water trucks, cranes, hydro cranes, wagon rock drills, dump trucks, and front-end loaders.
- Hauling lattice steel members, tubular poles, braces, and hardware to the structure sites: steel haul trucks, carry alls, cranes, and forklifts.
- Assembly and erection of structures: pickup trucks, 2-ton trucks, carry alls, cranes, and a heavy lift helicopter.
- Wire installation: pickups, wire reel trailers, diesel tractors, cranes, 5-ton boom trucks, splicing trucks, three drum pullers, single drum pullers, tensioner, sagging dozers, carry-alls, static wire reel trailers, bucket trucks, and a light duty helicopter.
- Final cleanup, reclamation, and restoration: pickup trucks, 2-ton trucks, bulldozers, motor graders, dump trucks, front-end loaders, hydro-seed truck, and water trucks.

The highest level of traffic will be when the wire stringing operations begin while several other operations are occurring at the same time, which will likely include ROW clearing, installing foundations, hauling steel, and assembling and erecting structures. For the station work, the highest level of traffic will be during site grading and foundation installation. For the communication station sites, the highest level of traffic will be during grading and site preparation.

Detailed estimates of trips generated by transporting Project construction equipment will be provided by the construction contractor prior to construction.

3.1.3 Traffic Related to Timber Removal

In forested areas, the Project will require removal of timber from the Project ROW and for construction and improvement of access roads. Specific timber harvest plans have not been finalized. Logs from timber clearing may be transported to nearby sawmills. Decisions regarding transportation routes for harvested timber will be made following completion of a timber harvest plan, and the number of log truck trips will be estimated when the timber harvest plan has been finalized. Logging slash will remain onsite if possible. For additional discussion regarding removal of timber in forested areas, see Exhibit K, Attachment K-2, ROW Clearing Assessment.

3.1.4 Impacts to V/C Ratios

Based on the estimated trip generation numbers in Tables 4 and 6, a maximum of approximately 1,294 daily one-way vehicle trips are expected within any one construction spread. To facilitate traffic and other analyses, the two construction spreads are divided into smaller sections based on similar construction windows and seasonal weather restrictions. Not all construction sections will have the same number of concurrent construction activities, depending on how the construction contractor sequences and executes the Project. Some sections will have fewer daily vehicle trips. For the purposes of the traffic analysis, the spreads are divided into five sections with multi-use areas that could have additive traffic impacts. The sections are assumed to have approximately equal levels of activity. The 1,294 daily one-way trips per spread divided over five sections of more concentrated traffic results in 259 daily one-

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

Upon the request of the La Grande City Council, a variety of street design standards have been reviewed and are now incorporated in the Land Development Code.

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

This classification will cover those streets that are designed to meet the standards for an expected life of twenty (20) years or more. The attached drawings shall be the minimum standard for those streets in this classification. All streets designated as Federal Aid Urban Streets (F.A.U.) shall be constructed under these design standards. Streets in this designation shall be constructed with sidewalks when at all possible in an effort to increase pedestrian safety. Collector streets are designed to withstand normal trucks of an HS 20 loading. Larger trucks are to utilize Arterial streets where at all possible. This level of development shall be the ultimate goal for all streets within the City of La Grande.

Possible means of financing available for this Class shall be methods A, B, C, D, E, F, G, and H in Section 6.6.006.

A. Advantages

1. The construction life is extended to a period above other City standards.
2. The visible aesthetics in relationship to having curbs and a blacktop surface with landscaping or concrete driveways and a sidewalk is generally appealing to the public.
3. Easy maintenance for the Public Works Department for cleaning and minor repair.
4. Storm sewer drainage is confined within the bounds of the curbs during minor flooding periods.
5. Parking is restricted to a solid barrier, that being the curb; this restricts parking in the area on the back side of the curb and confines travel to the street surface.
6. Defined areas for possible cross walks, signs, power poles, and other utilities that are restricted to the outside areas behind the curbs.
7. It allows for a wide range of financing methods and is to City standards for a ten (10) year Bancroft bonding.
8. Provides a dust free surface.

B. Disadvantages

1. The extreme high level of cost that is incurred with this type of development.

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

Streets constructed in this classification shall be constructed to the same standards as Class I Streets with the exception of the form of drainage system. These streets shall meet the standards as shown on the attached drawing. This level of construction shall be only utilized in substitution for Class I Streets when it is determined by the City Council at the recommendation of the City Engineer or Engineering Superintendent, that an adequate drainage system cannot be installed for a Class I Street.

Table 6. Construction Vehicle Trips per Day per Construction Spread

Construction Crew Type	Construction Vehicles					
	Light Construction Vehicles			Heavy Construction Vehicles		
	Number of Pickups/ Mechanic Trucks (per day)	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)	Number of Other Vehicles	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)
Substation Construction	20	2	40	5	2	10
ROW Clearing	9	4	36	5	4	20
Roads/ Pad Grading	9	4	36	9	2	18
Foundations	9	2	18	5	8	40
Tower Lacing (assembly)	27	2	54	0	0	0
Tower Setting (erection)	20	2	40	0	0	0
Wire Stringing	9	4	36	9	4	36
Restoration	3	2	6	0	0	0
Blasting	5	4	20	0	0	0
Material Delivery	20	8	160	12	2	24
Mechanic and Equipment Mgmt.	5	6	30	0	0	0
Refueling	0	0	0	5	4	20
Dust Control	0	0	0	5	4	20
Construction Inspection	5	8	40	0	0	0
Concrete Testing	5	4	20	0	0	0
Environmental Compliance	9	6	54	0	0	0
Surveyors	5	3	30	0	0	0
Totals	—	—	620	—	—	188

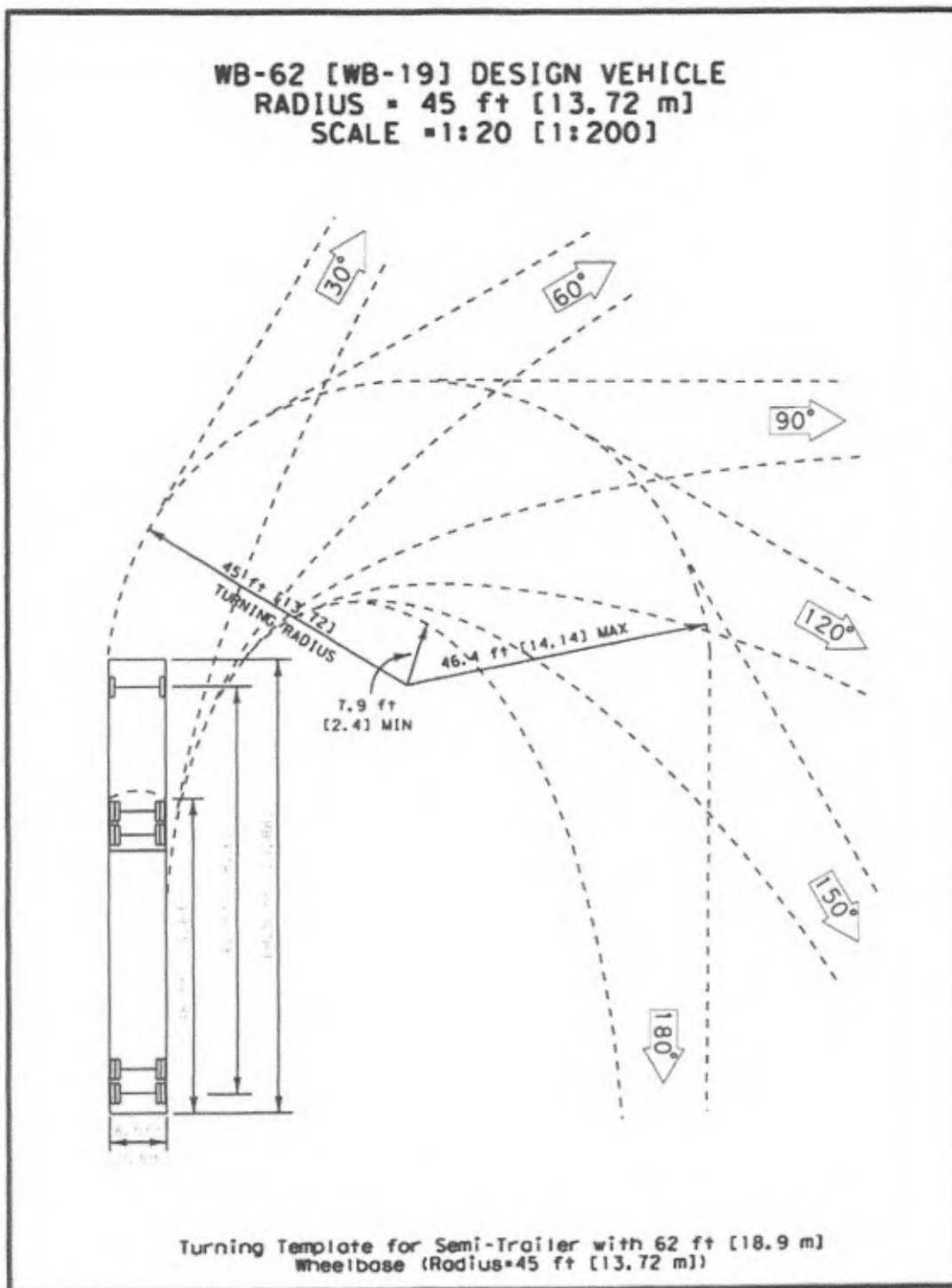
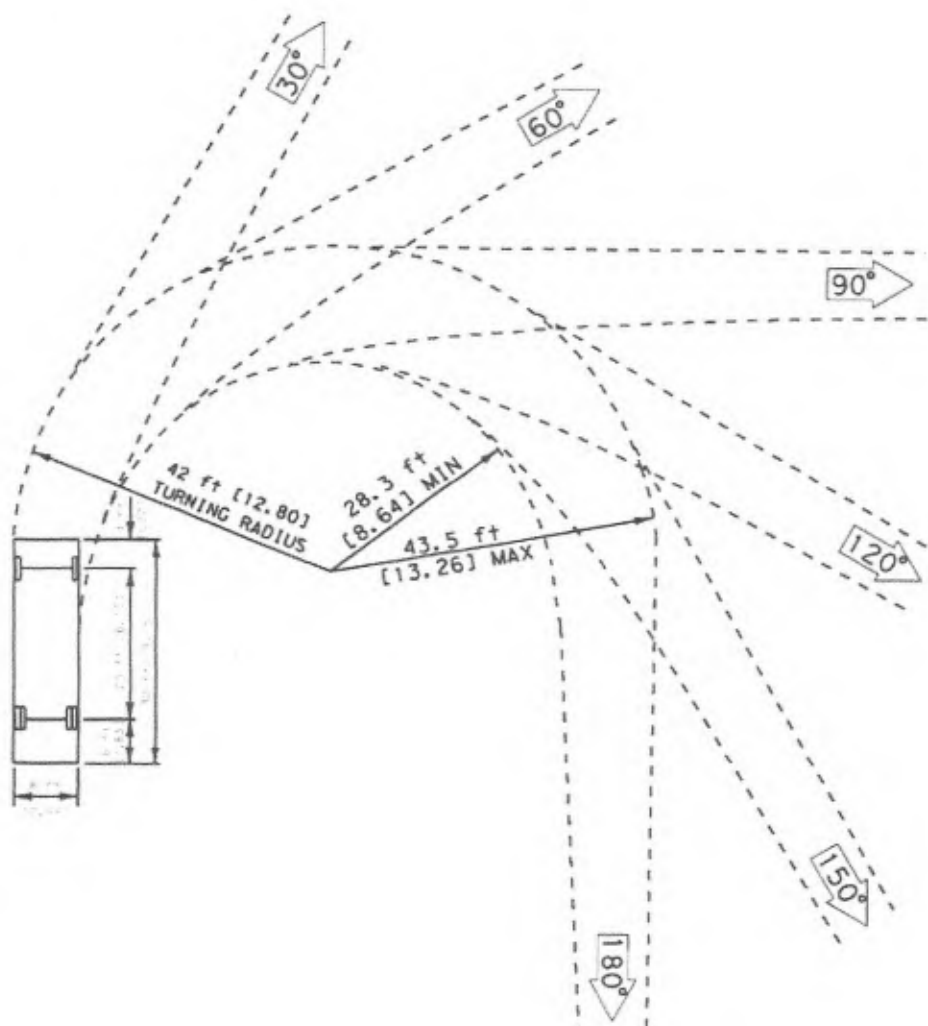


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

SINGLE UNIT (SU) TRUCK DESIGN VEHICLE
TURNING RADIUS = 42 ft [12.80 m]
SCALE = 1:20 [1:200]



Turning Template for Single Unit Trucks or Buses

Exhibit 15

**CITY OF LA GRANDE
ORDINANCE NUMBER 3077
SERIES 2009**

**AN ORDINANCE CONTROLLING VEHICULAR AND PEDESTRIAN TRAFFIC, PARADES
AND PROCESSIONS AND ISSUANCE OF PERMITS; PROVIDING PENALTIES; AND
REPEALING ORDINANCE NUMBER 2845, SERIES 1993; ALL AMENDING ORDINANCES
AND ALL OTHER ORDINANCES OR PARTS OF ORDINANCES IN CONFLICT HEREWITH;
AND DECLARING AN EFFECTIVE DATE**

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

Section 1. This Ordinance may be cited as the City of La Grande Uniform Traffic Ordinance.

Section 2. APPLICABILITY OF STATE TRAFFIC LAWS.

Oregon Revised Statutes, Chapter 153, and the Oregon Vehicle Code, ORS Chapter 801 and 822, as now constituted, are adopted by reference. Violation of an adopted provision of those chapters is an offense against the City.

Section 3. DEFINITIONS

In addition to those definitions contained in the Oregon state Motor Vehicle Code, the following words or phrases, except where the context clearly indicates a different meaning, shall mean:

a. Alley

A street or highway primarily intended to provide access to the rear or side of lots or buildings in urban areas and not intended for through vehicular traffic.

b. Bicycle

A bicycle is a vehicle that:

1. Is designed to be operated on the ground on wheels;
2. has a seat or saddle for use of the rider;
3. is designed to travel with not more than three (3) wheels in contact with the ground;
4. is propelled exclusively by human power; and,
5. has every wheel more than fourteen inches (14") in diameter or two (2) tandem wheels, either of which is more than fourteen inches (14") in diameter.

c. Bicycle Lane

That part of the highway, adjacent to the roadway, designated by official signs or markings for use by persons riding bicycles, except as otherwise specifically provided by law.

d. Bicycle Path

A public way, not part of a highway, which is designated by official signs or markings for use by persons riding bicycles, except as otherwise specifically provided by law.

e. Block

The part of one side of a street lying between the two (2) nearest cross streets.

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

The applicant shall submit an application to the City Manager or designee, showing the terminal points of the purported movement; the proposed route; the nature of the movement requested, including the weight and dimensions of the vehicle, load, machine, building, or structure to be moved; the time, date and duration of the proposed movement.

b. Special Movement Permit

A permit shall be required to move any vehicle, structure, or load on, or to access a street when, after preparation for movement, the vehicle, structure or load exceeds fourteen feet (14') in height, requires the use of guy wires, or could result in the blockage of a street. An approved application may serve as a permit, and a copy of the approved application shall be provided to the applicant.

Section 17. TRUCK ROUTES

- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, pounds specifically picking up deliveries or making deliveries to any business or residence located on a street that is not a truck route will be exempted if the vehicle is driven from the truck route to the destination in the shortest, most direct, and safest route.
- c. The use of Jacob brakes shall not be allowed within the city limits of La Grande, Oregon.
- d. Truck routes will be posted as follows:
 1. Walnut street north from the city limits to C Avenue;
 2. C Avenue east from Walnut Street to Gekeler Avenue;
 3. Gekeler Avenue east to the city limits;
 4. 12th street south from Gekeler Avenue to the city limits;
 5. 2nd Street south from the city limits to Adams Avenue;
 6. Monroe Avenue east from Spruce Street to Highway 82;
 7. Jackson Avenue east from Spruce Street, and
 8. Spruce Street south from the city limits to Monroe.

Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement officer may cause the vehicle to be towed and stored at the owner's expense. The owner shall be liable for the costs of towing and storing, notwithstanding that the vehicle was parked by another or that the vehicle was initially parked in a safe manner but subsequently became an obstruction or hazard.

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

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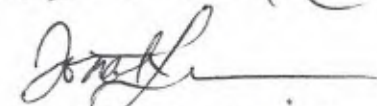

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John Barutz

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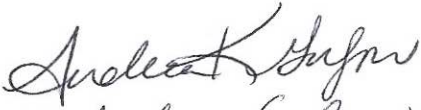
John Barutz


ADDRESS


484 Hawthorne LG, OR 97850


EMAIL


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I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

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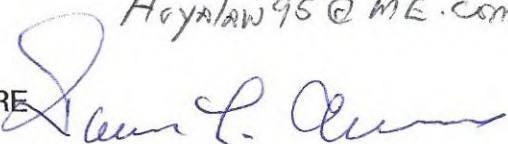
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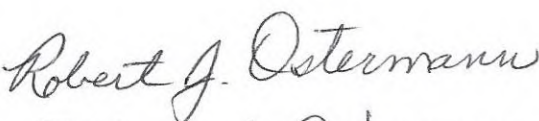

Linda Snyder
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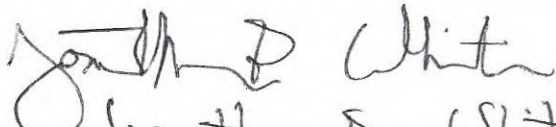
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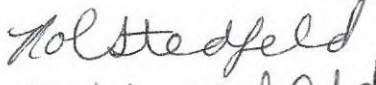
ADDRESS


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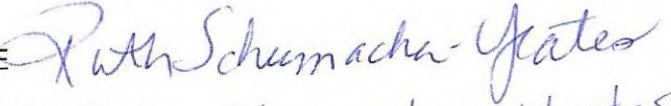

Robin J. Ostermann
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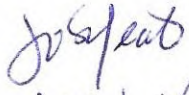
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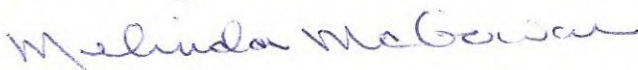
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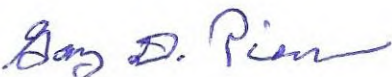
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SIGNATURE 

PRINTED NAME Gary D. Pierson

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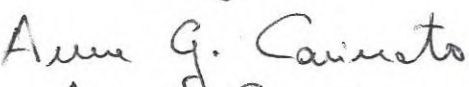
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SIGNATURE

Gerald D. Juniper

PRINTED NAME *Gerald Darwin Juniper*

ADDRESS *406 4th St. LaGrande, PR. 97850*

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TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:28 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order 5/23/2019
Attachments: Scan 2019-8-15 17.14.06.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter sign by me and 46 other residents of La Grande expressing our concerns regarding the B2H Project and requesting that EFSC Deny the Site Certificate.

I have also sent a bound copy of this material by US Postal Service.

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, Oregon. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that that will impact the west hills and the area below.

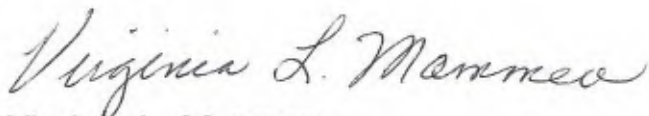
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140dBA at the blast location or over 90 dBA within 500 feet." This sounds oh so "don't worry about it, it will be OK just over in a split second." Living in this area off Modelaire Drive, I don't find this at all comforting. And the fact that this will be overseen by properly licensed personnel and all of the necessary authorizations doesn't help anything either.

The area in question, which for such inordinate construction is extremely close to many residents, has been my home for over 50 years and during

related medical problems and exhibit various reactions to loud noises.¹⁰
These children also live in the neighborhoods to be affected by the noise
so they would be impacted coming and going to school, at home and also
while at school. To impose the constant possibility of loud noises is cruel,
disrespectful and totally unacceptable. ¹¹

For a project like this involving blasting and heavy machinery noise so
close to homes, schools, and medical facilities impacting hundreds of
peoples' daily lives, the day to day agitation, wondering what is coming
next, fear and being on constant alert are not just addressed by some type
of mitigation but must be addressed by a route that is much less impactful
to peoples' safety, sanity, and health.

Sincerely,

A handwritten signature in cursive script that reads "Virginia L. Mammen".

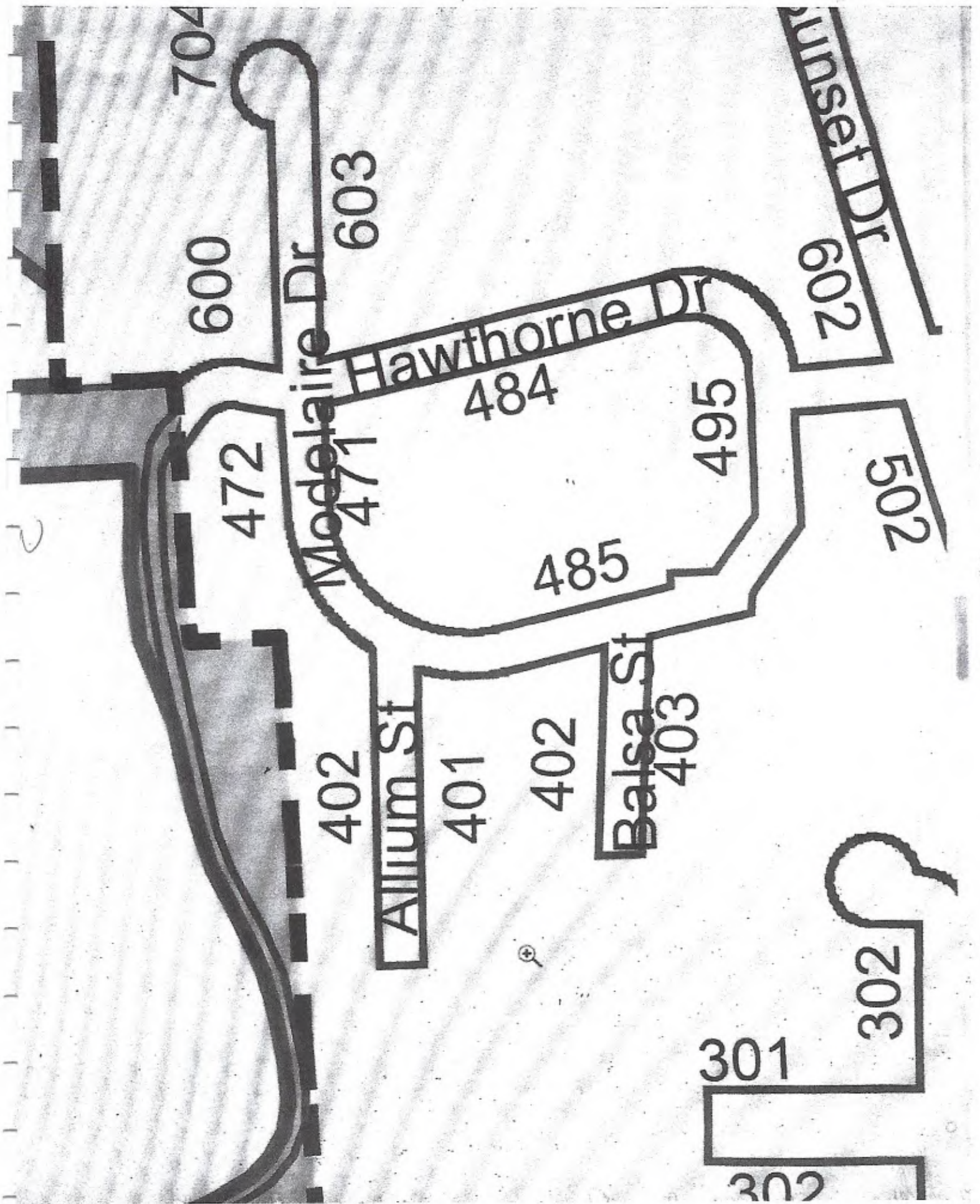
Virginia L. Mammen

405 Balsa

La Grande, Oregon 97850

gmammen@eoni.com

N



3.3 Predicted Noise Levels

OAR 345-021-0010(1)(x)(A): Predicted noise levels resulting from construction and operation of the proposed facility.

3.3.1 Construction Noise

3.3.1.1 Predicted Construction Noise Levels

Project construction will occur sequentially, moving along the length of the Project route, or in other areas such as near access roads, structure sites, conductor pulling sites, and staging and maintenance areas. Overhead transmission line construction is typically completed in the following stages, but various construction activities may overlap, with multiple construction crews operating simultaneously:

- Site access and preparation
- Installation of structure foundations
- Erecting of support structures
- Stringing of conductors, shield wire, and fiber-optic ground wire

The following subsections discuss certain construction activities that will periodically generate audible noise, including blasting and rock breaking, implosive devices used during conductor stringing, helicopter operations, and vehicle traffic.

Blasting and Rock Breaking

Blasting is a short-duration event as compared to rock removal methods, such as using track rig drills, rock breakers, jackhammers, rotary percussion drills, core barrels, or rotary rock drills. Modern blasting techniques include the electronically controlled ignition of multiple small-explosive charges in an area of rock that are delayed fractions of second, resulting in a total event duration that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140 dBA at the blast location or over 90 dBA within 500 feet.

Lattice tower foundations for the Project typically will be installed using drilled shafts or piers; however, if hard rock is encountered within the planned drilling depth, blasting may be required to loosen or fracture the rock to reach the required depth to install the structure foundations. Final blasting locations will not be identified until an investigative geotechnical survey of the analysis area is conducted during the detailed design.

The contracted blasting specialist will prepare a blasting plan that demonstrate compliance with applicable state and local blasting regulations, including the use of properly licensed personnel and the acquisition of necessary authorizations. The Framework Blasting Plan is set forth in Exhibit G, Attachment G-5.

Implosive Devices

An implosive conductor splice consists of a split-second detonation with sound and flash. Implosive splicing activities are anticipated to be limited to daytime hours. A blasting plan will be developed by an individual certified and licensed to perform the work. The plan will communicate all safety and technical requirements including, but not limited to, delineation of the controlled access zone and distance away from residences.

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety. Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



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Department of Environmental Quality

Chapter 340

Division 35

NOISE CONTROL REGULATIONS

340-035-0035**Noise Control Regulations for Industry and Commerce****(1) Standards and Regulations:**

(a) **Existing Noise Sources.** No person owning or controlling an existing industrial or commercial noise source shall cause or permit the operation of that noise source if the statistical noise levels generated by that source and measured at an appropriate measurement point, specified in subsection (3)(b) of this rule, exceed the levels specified in Table 7, except as otherwise provided in these rules. [Table not included. See ED. NOTE.]

(b) New Noise Sources:

(A) **New Sources Located on Previously Used Sites.** No person owning or controlling a new industrial or commercial noise source located on a previously used industrial or commercial site shall cause or permit the operation of that noise source if the statistical noise levels generated by that new source and measured at an appropriate measurement point, specified in subsection (3)(b) of this rule, exceed the levels specified in Table 8, except as otherwise provided in these rules. For noise levels generated by a wind energy facility including wind turbines of any size and any associated equipment or machinery, subparagraph (1)(b)(B)(iii) applies. [Table not included. See ED. NOTE.]

(B) New Sources Located on Previously Unused Site:

(i) No person owning or controlling a new industrial or commercial noise source located on a previously unused industrial or commercial site shall cause or permit the operation of that noise source if the noise levels generated or indirectly caused by that noise source increase the ambient statistical noise levels, L10 or L50, by more than 10 dBA in any one hour, or exceed the levels specified in Table 8, as measured at an appropriate measurement point, as specified in subsection (3)(b) of this rule, except as specified in subparagraph (1)(b)(B)(iii).

(ii) The ambient statistical noise level of a new industrial or commercial noise source on a previously unused industrial or commercial site shall include all noises generated or indirectly caused by or attributable to that source including all of its related activities. Sources exempted from the requirements of section (1) of this rule, which are identified in subsections (5)(b)-(f), (j), and (k) of this rule, shall not be excluded from this ambient measurement.

(iii) For noise levels generated or caused by a wind energy facility:

(I) The increase in ambient statistical noise levels is based on an assumed background L50 ambient noise level of 26 dBA or the actual ambient background level. The person owning the wind energy facility may conduct measurements to determine the actual ambient L10 and L50 background level.

(II) The "actual ambient background level" is the measured noise level at the appropriate measurement point as specified in subsection (3)(b) of this rule using generally accepted noise engineering measurement practices. Background noise measurements shall be obtained at the appropriate measurement point, synchronized with wind speed measurements of hub height conditions at the nearest wind turbine location. "Actual ambient background level" does not include noise generated or caused by the wind energy facility.

(III) The noise levels from a wind energy facility may increase the ambient statistical noise levels L10 and L50 by more than 10 dBA (but not above the limits specified in Table 8), if the person who owns the noise sensitive property executes a legally effective easement or real covenant that benefits the property on which the wind energy facility is located. The easement or covenant must authorize the wind energy facility to increase the ambient statistical noise levels, L10 or L50 on the sensitive property by more than 10 dBA at the appropriate measurement point.

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(2) Compliance. Upon written notification from the Director, the owner or controller of an industrial or commercial noise source operating in violation of the adopted rules shall submit a compliance schedule acceptable to the Department. The schedule will set forth the dates, terms, and conditions by which the person responsible for the noise source shall comply with the adopted rules.

(3) Measurement:

(a) Sound measurements procedures shall conform to those procedures which are adopted by the Commission and set forth in Sound Measurement Procedures Manual (NPCS-1), or to such other procedures as are approved in writing by the Department;

(b) Unless otherwise specified, the appropriate measurement point shall be that point on the noise sensitive property, described below, which is further from the noise source:

(A) 25 feet (7.6 meters) toward the noise source from that point on the noise sensitive building nearest the noise source;

(B) That point on the noise sensitive property line nearest the noise source.

(4) Monitoring and Reporting:

(a) Upon written notification from the Department, persons owning or controlling an industrial or commercial noise source shall monitor and record the statistical noise levels and operating times of equipment, facilities, operations, and activities, and shall submit such data to the Department in the form and on the schedule requested by the Department. Procedures for such measurements shall conform to those procedures which are adopted by the Commission and set forth in Sound Measurement Procedures Manual (NPCS-1);

(b) Nothing in this rule shall preclude the Department from conducting separate or additional noise tests and measurements. Therefore, when requested by the Department, the owner or operator of an industrial or commercial noise source shall provide the following:

(A) Access to the site;

(B) Reasonable facilities, where available, including but not limited to, electric power and ladders adequate to perform the testing;

(C) Cooperation in the reasonable operation, manipulation, or shutdown of various equipment or operations as needed to ascertain the source of sound and measure its emission.

(5) Exemptions: Except as otherwise provided in subparagraph (1)(b)(B)(ii) of this rule, the rules in section (1) of this rule shall not apply to:

(a) Emergency equipment not operated on a regular or scheduled basis;

(b) Warning devices not operating continuously for more than 5 minutes;

(c) Sounds created by the tires or motor used to propel any road vehicle complying with the noise standards for road vehicles;

(d) Sounds resulting from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad only to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576; but this exemption does not apply to any standard, control, license, regulation, or restriction necessitated by special local conditions which is approved by the Administrator of the EPA after consultation with the Secretary of Transportation pursuant to procedures set forth in Section 17(c)(2) of the Act;

(e) Sounds created by bells, chimes, or carillons;

(f) Sounds not electronically amplified which are created by or generated at sporting, amusement, and entertainment events, except those sounds which are regulated under other noise standards. An event is a noteworthy happening and does not include informal, frequent, or ongoing activities such as, but not limited to, those which normally occur at bowling alleys or amusement parks operating in one location for a significant period of time;

(g) Sounds that originate on construction sites.

(h) Sounds created in construction or maintenance of capital equipment;

(i) Sounds created by lawn care maintenance and snow removal equipment;

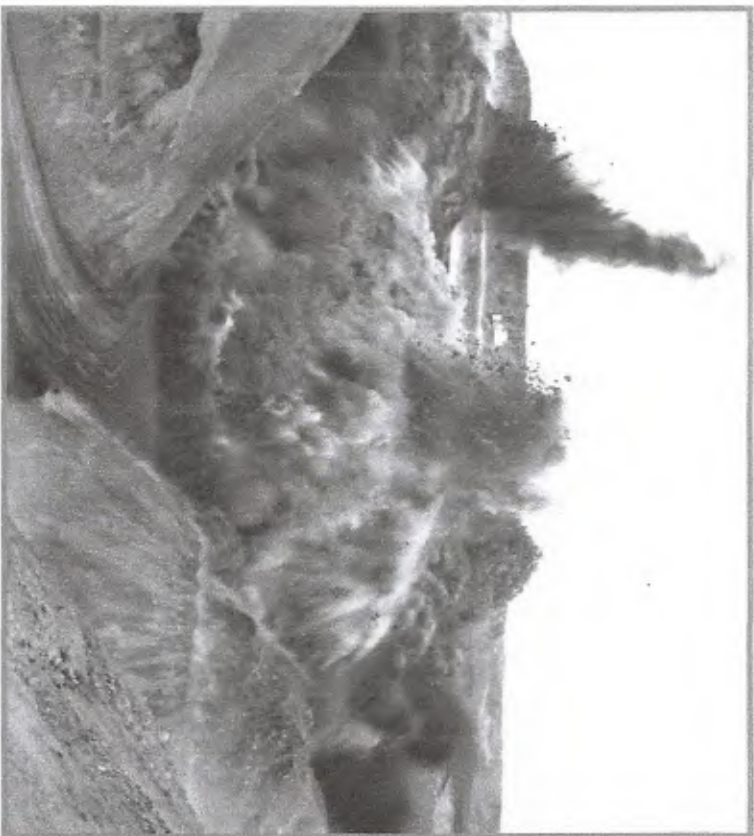
(j) Sounds generated by the operation of aircraft and subject to pre-emptive federal regulation. This exception does not apply to aircraft engine testing, activity conducted at the airport that is not directly related to flight operations, and any other activity not pre-emptively regulated by the federal government or controlled under OAR 340-035-0045;

Controlling the Adverse Effects of Blasting

This module addresses the control of offsite impacts that result from blasting, namely:

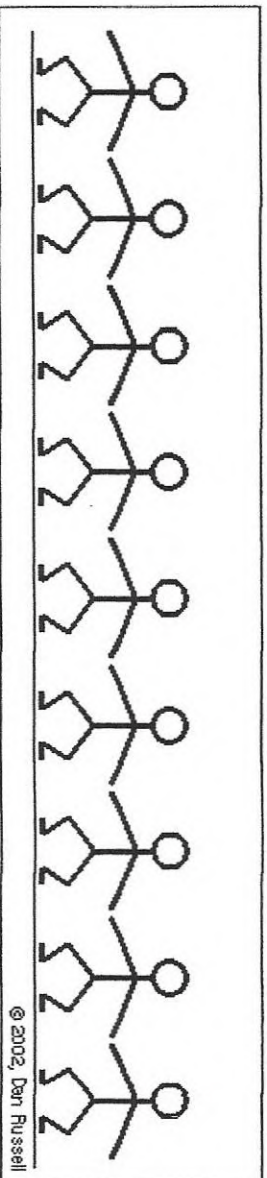
- vibrations,
- airblast, and
- flyrock.

Much of the information in the module is derived from the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The performance standards apply to all surface coal mines. Similar standards have been adopted on some State and local levels and applied to non-coal blasting operations such as quarrying and construction.



Part I: Ground Vibrations, Airblast, and Flyrock

Explosive energy is used to break rock. However, the use of this energy is not 100-percent efficient. Some of the energy escapes into the atmosphere to generate **airblast or air vibrations**. Some of the energy also leaves the blast site through the surface soil and bedrock in the form of **ground vibrations**.



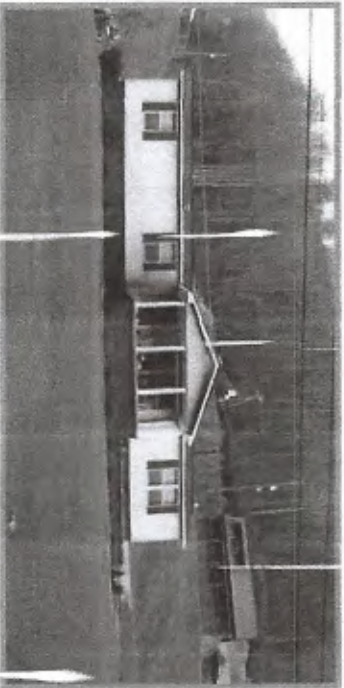
Both air and ground vibrations create waves that disturb the material in which they travel. When these waves encounter a structure, they cause it to shake. Ground vibrations enter the house through the basement and airblast enters the house through the walls and roof.

Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior noise" will alarm and startle people living in the house.

Flyrock is debris ejected from the blast site that is traveling through the air or along the ground. Flyrock the single most dangerous adverse effect that can cause property damage and personal injury or death.

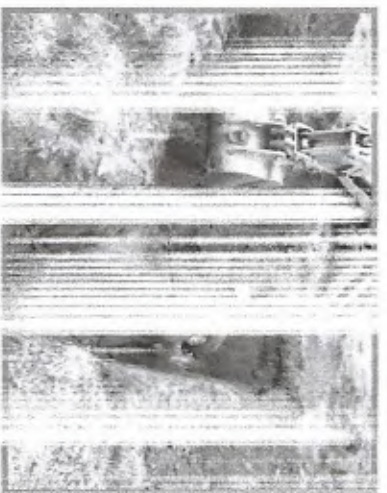
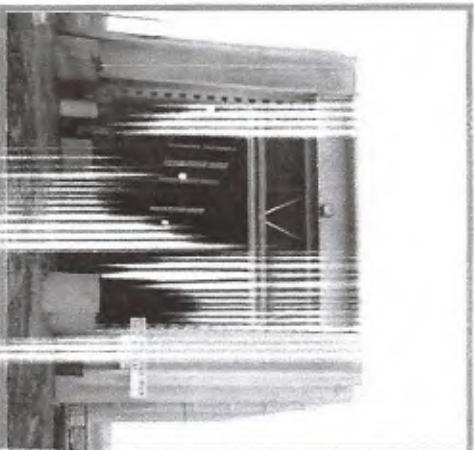
Blasting Impacts on Structures

Both above-ground and below-ground structures are susceptible to vibration impacts. Structures can include onsite mine offices and buildings, as well as offsite residences, schools, churches, power-transmission lines, and buried pipelines. Some of these structures may include historic or cultural features sensitive to even low levels of vibrations.



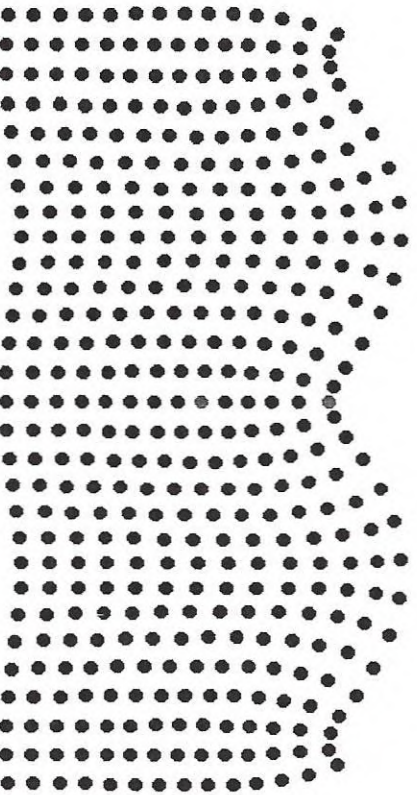
It is important to understand:

1. the causes of ground vibrations and airblast, and
2. what practices can be followed to control and minimize the adverse effects



Ground Vibrations

Ground vibrations propagate away from a blast site as Rayleigh (or surface) waves. These waves form a disturbance in the ground that displaces particles of soil or rock as they pass by. Particle motions are quite complicated. At the ground surface (free boundary), measured particle motions have the greatest displacements, and displacements decrease with depth (see the illustration below). At a depth of between 20 to 50 feet below ground surface, particle displacements are barely detectable. Structures that are well coupled to the ground tend to move with this motion; structures buried in the ground are less affected by surface motions.



©1999, Daniel A. Russell

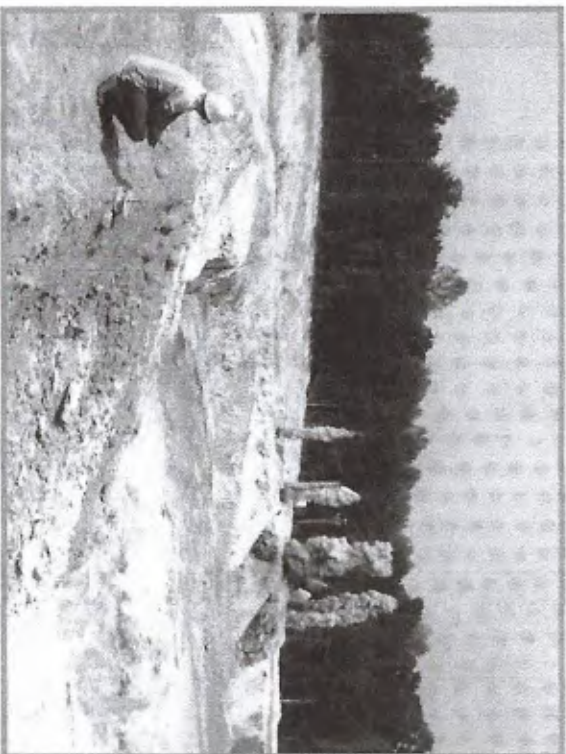
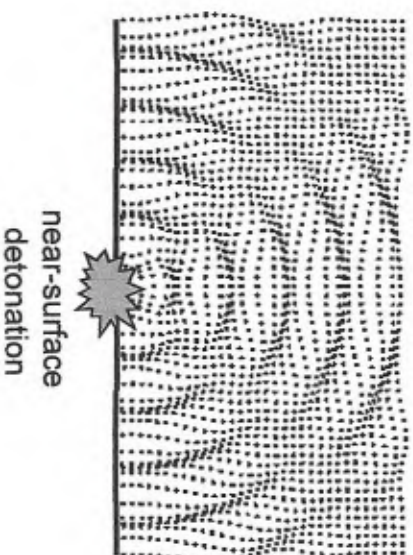
Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

2 Airblast is measured as a pressure in pounds per square
5 inch (psi) and is often reported in terms of **decibels (dB)**.

Airblast is a pressure wave that that may be audible or in-audible. Elevated airblast levels are generated when explosive energy in the form gases escape from the detonating blast holes. Energy escapes either through the top stemming or through fractures in the rock along the face or at the ground surface.



Airblast radiates outward from the blast site in all directions and can travel long distances. Sound waves travel much slower (1,100 ft/s) than ground vibrations (about 5,000 – 20,000 ft/s). Hence, airblast arrives at offsite structures later than do ground vibrations.

Both ground vibrations and airblast cause structures to shake structures. Occupants in structures that are located far from a blast may experience shaking from vibration and airblast as two separate, closely spaced events. This can be particularly bothersome, as it prolongs the duration of structure shaking and leads the property owner to think that two separate blasts occurred.

Structure Response

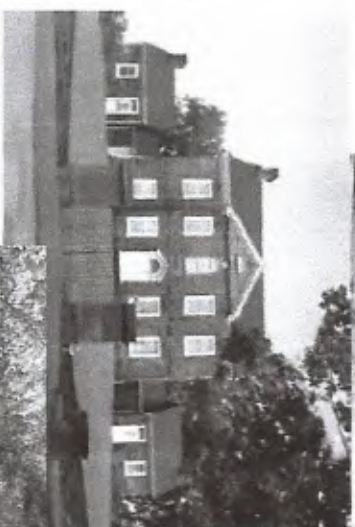
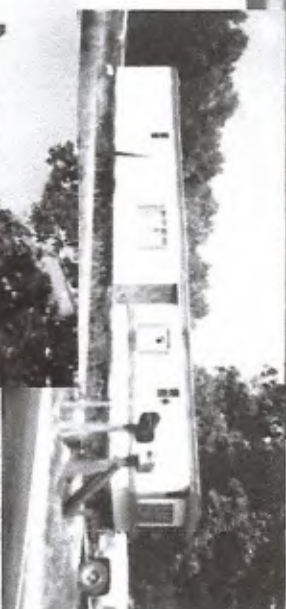
As ground and air vibrations reach a structure, each will cause it to shake. Structure response is dependant on the vibration characteristics (frequency and amplitude) and structure type.

Ground Vibrations enter the house through the basement. This is like shaking the bottom of a flag pole. Movement at the top of the pole depends on how (frequency) and how hard (amplitude) the bottom of the pole is shaken. If shaken at just the right pace, or at the pole's natural frequency, the top will move significantly compared to the bottom. Motion at the top is amplified from the bottom motion.

All blast damage studies have measured incoming ground vibrations at the ground surface. The observed structure amplifications were typically between 1 to 4 times the ground vibration. Structure response below ground level is the same or less than the incoming vibrations

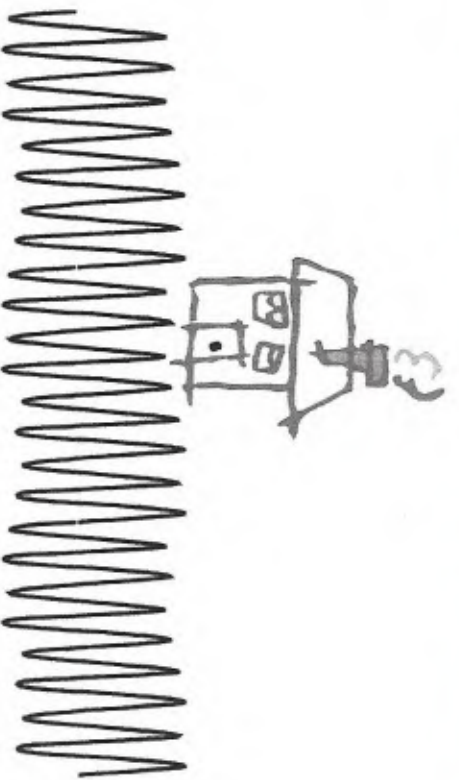
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

Due to the different arrival times of ground and air vibrations, occupants may feel two distinct impacts on the house.



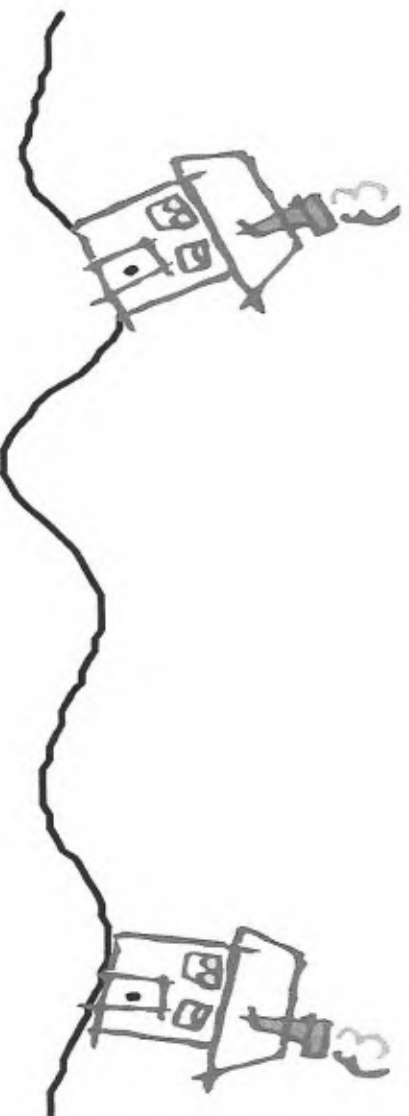
Ground Vibration Structure Response

Exhibit 59



High frequencies do not promote structure shaking. The length of a single high-frequency wave cycle is short as compared with the dimension of a structure. A structure does not significantly respond to high frequencies.

On the other hand, low-frequency wave cycles are long as compared with the dimensions of structures. Accordingly, low frequencies tend to efficiently couple energy into structures and to promote higher-amplitude, long-duration shaking.



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LICENSING

Harvard Men's Health Watch

A noisy problem

People often become more sensitive to noise as they age, which can affect their mental and physical health.

Published: March, 2019



Image: © Juanmonino/Getty Images

Are you more sensitive to noises than you used to be? Do certain sounds now feel too loud and jarring? Don't worry; it's actually quite normal.

Age-related hearing loss is common among older adults and affects about two-thirds of men in their 70s and 85% of men ages 80 and older. Although it's not clear why, this can also make people hypersensitive to sounds that they used to tolerate easily, which in turn can affect their well-being.

"Exposure to noises from crowds, traffic, and other everyday sounds can become harder to tolerate and increase stress levels, leading to anxiety and a reduction in overall quality of life," says Dr. Stephanie Tompkins, an audiologist with Harvard-affiliated Massachusetts Eye and Ear. "As your sensitivity to noises increases, this can lead to greater isolation, too, as you may try to avoid potentially noisy places and situations."

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Quiet in the Hospital: How Noise...

Quiet in the Hospital: How Noise Reduction Helps Patients Heal

on June 7, 2018 (<https://medcenterblog.uvmhealth.org/innovations/hospital-noise-reduction/>) in Innovation
(<https://medcenterblog.uvmhealth.org/category/innovations/>) by UVM Medical Center
(<https://medcenterblog.uvmhealth.org/author/uvmmedcenter/>)

Noise. It is present in almost every aspect of our lives. From the traffic in the streets, to the fan that provides us white noise in the background to sleep, noise exists. Unfortunately, like stress, too much of it can have a negative impact on a person's health and rest. Some sounds we do like to hear, such as birds chirping, signaling spring in Vermont, but what about sounds in a hospital?

Many of us get admitted to hospitals when we are too sick to take care of ourselves at home. We expect exceptional care from physicians and nurses and, of course, to rest in order to help our bodies heal. We understand that some noises in a hospital are necessary for care; however, others simply aren't.

The Sounds of a Hospital

Many organizations, including the UVM Medical Center, have high tech equipment, which greatly assists in the delivery of care to our patients, but can also be noisy. Sometimes, healthcare providers are the source of the noise as we interact and communicate with our patients and other health team members.

Another factor is visits from families and friends during visiting hours. It is difficult when one's roommate is trying to rest in the opposite bed. Yet, we need to be cognizant of noise in patient care areas as sounds can be magnified and misinterpreted, increasing agitation and even confusion for some patients.

We become accustomed to the noise; our patients are not.

The Research on Noise, Quiet, and Healing

Research has shown that noise plays a negative role in healing and that decreasing noise in patient care areas aids in healing processes and helps facilitate speedier recoveries for patients. Patients are able to heal, sleep better and recover more quickly when able to rest. A quieter environment can also help decrease burnout for hospital staff.

Studies show that patients are more likely to develop negative side effects from a noisy hospital, such as sleep disturbances, elevated blood pressure and heart rate, and increased use of pain medications.

Noise can also increase annoyance levels for staff. One study indicated noise, such as talking inside and outside patient rooms, is the most common source of noise as well as visitors' voices, TVs, and behaviors of other patients.

Research concluded that best practices to eliminate noise from talking included staff education about noise reduction, public indicators such as sound monitors, a quiet time protocol, and lower cost environmental fixes, such as fixing noisy doors and squeaky wheels. Lastly, by introducing scripting with routine monitoring, patients' perception of quietness increased and the perception of noise decreased.

How We Address Noise at the UVM Medical Center

We introduced the "Culture of Quiet" Organizational initiative. The Nursing Professional Governance Patient and Family Experience Global council continued this work. After convening a small task force of nurses and assessing current quiet strategies, we introduced the following tactics:

- Many hospital units have designated 'quiet hours' with automatically dimming of lights at quiet hour intervals.
- Signage is visible in most patient care areas to help keep patients, family, and visitors aware. Throughout the hospital, you will see signs with a relaxing pair of Adirondack chairs and the sun setting with details on when a unit has quiet hours.
- Many semi-private rooms have windows in doors, so doors can be closed allowing for patient rest.
- We offer headphones for TVs and earplugs to help minimize sounds.
- In-patient kits contain a sleeping mask and other comfort items that can be provided at time of admission. Each kit contains a card and explains, 'the best healing occurs in a quiet environment.'
- New education material is available for staff, patients and visitors-just ask to review the next time visiting.
- Some units offer white noise machines, others have this built in.
- Noisy equipment such as wheels and doors can be tagged and replaced.
- Our facility and distribution staff have changed their cleaning and supply delivery schedules to accommodate patient care.
- Healthcare teams within the hospital are focusing efforts to cluster patient care to minimize interruptions to provide restful moments.

How you can help us.

We ask patients and visitors to hold us accountable when sounds are too loud. We want our community to alert us when noise levels are high and we will do what we can to minimize sound. In turn, we ask that all members of the healthcare team, patients, family, and friends be aware to keep voices soft, cell phones on vibrate, and hold each other accountable for these are the times of the day when our patients take pause to rest and positively impact their healing.

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Dangerous Decibels: Hospital Noise More Than a Nuisance

By Diane Sparacino, Staff Writer

Imagine a world where hospitals have become so noisy that the annoyance has topped hospital complaints, even more than for the tasteless, Jell-O-laden hospital food (Deardorff, 2011). If you're a nurse, you know that we're already there – with noise levels reaching nearly that of a chainsaw (Garcia, 2012). In fact, for more than five decades, hospital noise has seen a steady rise (ScienceDaily, 2005).

But it wasn't always that way. At one time, hospitals were virtually noise-free like libraries – respected spaces, preserved as quiet zones. The culture was such that a loud visitor might be silenced by a nurse's purposeful glare or sharply delivered "Shhh!" As early as 1859, the importance of maintaining a quiet environment for patients was a topic for discussion. In Florence Nightingale's book, "Notes on Nursing," she described needless noise as "the most cruel absence of care" (Deardorff, 2011).

Fast forward to 1995, when the World Health Organization (WHO) outlined its hospital noise guidelines, suggesting that patient room sound levels not exceed 35 decibels (dB). Yet since 1960, the average daytime hospital noise levels around the world have steadily risen to more than double the



acceptable level (from 57 to 72 dB), with nighttime levels increasing from 42 to 60 dB. WHO found that the issue was not only pervasive, but high noise levels remained fairly consistent across the board, despite the type of hospital (ScienceDaily, 2005).

Researchers at Johns Hopkins University began to look into the noise problem in 2003. They maintained that excessive noise not only hindered the ability for patients to rest, but raised the risk for medical errors. Other studies blamed hospital noise for a possible increase in healing time and a contributing factor in stress-related burnout among healthcare workers (ScienceDaily, 2005).

Technology is, of course, partly to blame. State-of-the-art machines, banks of useful alarms, respirators, generators, powerful ventilation systems and intercoms all add up to a lot of unwanted racket. When human voices are added to the mix, (i.e., staff members being forced to speak loudly over the steady din of medical equipment), it's anything but a restful environment. For the recovering patient in need of sleep, that can be a real issue (Deardorff, 2011).

Contributing to the problem, experts say, are the materials used in hospitals. Because they must be easily sanitized, surfaces cannot be porous where they could harbor disease-causing organisms. Rather than using noise-muffling materials like carpet, acoustic tiles and other soft surfaces, hospitals have traditionally been outfitted using smooth, hard surfaces – especially in patient rooms. Good for cleanliness – not so great for dampening sounds, which tend to bounce around the typical hospital (Deardorff, 2011).

Which brings us to the most recent research, published January 2012 in the *Archives of Internal Medicine*. In the report, Jordan Yoder, BSE, from the Pritzker School of Medicine, University of Chicago, and his colleagues associated elevated noise levels with "clinically significant sleep loss among hospitalized patients," perhaps causing a delay in their recovery time (Garcia, 2012). During the 155-day study period, researchers examined hospital sound levels. The numbers far exceeded (WHO) recommendations for average hospital-room noise levels, with the peak noise at an average 80.3 dB – nearly as loud as a chainsaw or electric sander (85 dB), and well over the recommended maximum of 40 dB. And while nights tended to be quieter, they were still noisier than recommended allowances, with "a mean maximum sound level of 69.7 dB" (Garcia, 2012).

Perhaps most interestingly, the researchers broke down the sources of noise into categories: "Staff conversation (65%), roommates (54%), alarms (42%), intercoms (39%), and pagers (38%) were the most common sources of noise disruptive reported by patients" (Garcia, 2012). "Despite the importance of sleep for recovery, hospital noise may put patients at risk for sleep loss and its associated negative effects," they wrote. In addition, researchers found that the intensive care and surgical wards had some work to do in dampening noise levels, with ICU peaking at 67 dB and 42 dB for surgical areas. Both far exceeded WHO's 30 dB patient room recommendation (Garcia, 2012).

Besides patient sleep deprivation, which itself can lead to a multitude of health problems including high blood sugar, high blood pressure and fatigue, studies have reported that elevated noise levels can increase heart and respiratory rates, blood pressure and cortisol levels. Recovery room noise causes patients to request more pain medication, and preterm infants "are at increased risk for hearing loss, abnormal brain and sensory development, and speech and language problems when exposed to prolonged and excessive noise" (Deardorff, 2011).

There is still more research to be done, of course, but Yoder and his colleagues had good news, as well; much of the hospital noise they identified is modifiable, suggesting that hospitals can take steps to successfully create a quieter environment for both patients and healthcare providers (Garcia, 2012).

Around the country, "quiet campaigns" have been launched by hospitals in an attempt to dampen nighttime noise. Besides dimming lights and asking staff to keep their voices down at night, they are working to eliminate overhead paging systems, replace wall and/or floor coverings – even the clang of metal trashcans. Northwestern's Prentice Women's Hospital in Chicago was built with noise reduction in mind, replacing the idea of centralized nursing stations with the advent of smaller, multiple stations (Deardorff, 2011)

Billed as "one of the nation's largest hospital construction projects," Palomar Medical Center in North San Diego County is a state-of-the-art facility that has been designed "to encourage quietness," according to Tina Pope, Palomar Health Service Excellence Manager. Slated to open its doors this August, the hospital will feature a new nursing call system to route calls directly to staff and help eliminate the need for overhead paging, de-centralized nursing stations and clear sig lines, allowing staff to check on patients without having to leave unit doors open. With measures already in place including "Quiet Hospital" badges on staff and posters at the entrance of every unit, a "Quiet at Night" campaign (9 p.m. – 6 a.m.), and a "Quiet Champions" program that encourages staff to report noise problems, Palomar is one of a growing number of hospitals working toward a new era of quiet.

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Noises Are Truly Horrible For People Who Have PTSD

20 Mar '2018 [Sound](#)

Noise is a really big issue for PTSD survivors: people who have mental health problems because of their traumas. How are they connected?

Almost everybody has experienced a trauma. But some traumas are more scarring than others and can even result in long-lasting mental disorders like **PTSD**, which can have an extreme impact on someone's life. It's a disorder that can develop in the brain after a horrifying experience, like war or a car crash.

Symptoms

The symptoms of PTSD are, to say the least, not pleasant. They range from nightmares about the traumatic events, disturbing thoughts and feelings, anxiety, trying to avoid anything that has something to do with the traumatic event, and an increase in the fight-or-flight response.

Around ten percent of the population suffers from PTSD, according to data from **NCBI**, a part of the US National Library of Medicine. And, remarkably enough, that percentage is the same for people who suffer from tinnitus (the sound of a constant beep in your ears). The NCBI clearly sees a link between the two.

PTSD survivors also suffer from the Exaggerated Startle Syndrome, with anxiety and actions in an extreme and irrational way too loud noises and bangs. And then there are the sounds that remind them of the sounds during the traumatic events, which can trigger memories of the



Fear

PTSD can also cause a general fear of sounds: phonophobia, or a fear of some specific sounds: misophonia. Survivors of the disorder also are generally much more sensitive to sounds and perceive them as much louder than other people would.

All of this makes the life of people with PTSD very hard. If you think you are suffering from this, consult your doctor. Really, please do it. For yourself, and for the ones you love.

Do you have PTSD and would you like to tell your experiences to us? We are always very open and interested to hear what you have to say. And again: if you haven't done it yet, visit your doctor, please. Thank you!

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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

In everyday life, cognitive tasks are often performed in the presence of task-irrelevant environmental noise. Accordingly, numerous studies on noise effects on performance have been conducted since the middle of the 20th century (for reviews see Hellbrück and Liebl, 2007; Szalma and Hancock, 2011), showing that—depending on characteristics of sounds and tasks—noise of low to moderate intensity may in fact evoke substantial impairments in performance.

Most of these studies were conducted with adults. The present review, however, will focus on studies including children. Children are especially vulnerable to harmful effects of environmental noise, as cognitive functions are less automatized and thus more prone to disruption. We will report findings concerning effects of acute noise on performance in concurrent auditory and non-auditory tasks, as well as effects of chronic noise on children's cognitive development.

Effects of acute noise on children's performance in auditory tasks

Psychoacoustic studies have consistently shown that children's speech perception is more impaired than adults' by unfavorable listening conditions. The ability to recognize speech under conditions of noise or noise combined with reverberation improves until the teenage years (Johnson, 2000; Wightman and Kistler, 2005; Talarico et al., 2007; Neuman et al., 2010). With stationary noise makers, signal-to-noise ratios (SNRs) have to be 5–7 dB higher for young children when compared to adults in order to achieve comparable levels of identification of speech or nonspeech signals, with adult-like performance reached at about 6 years of age (Schneider et al., 1989; Fallon et al., 2000; Werner, 2007). However, with maskers that vary over time, i.e., with trial-by-trial variation of the maskers' spectral composition (Oh et al., 2001; Hall et al., 2005; Leibold and Neff, 2007) or with fluctuating maskers such as single-talker speech (Wightman and Kistler, 2005), adult-like performance is usually not reached before the age of 10 years. Furthermore, children are less able than adults to make use of spectro-temporal and spatial cues for separation of signal and noise (Wightman et al., 2003; Hall et al., 2005). These findings demonstrate that children are especially prone to *informational* masking, i.e., masking that goes beyond energetic masking predicted by filter models of the auditory periphery.

Studies identified a range of linguistic and cognitive factors to be responsible for children's difficulties with speech perception in noise: concerning the former, children are less able than adults to use stored phonological knowledge to reconstruct degraded speech input. This holds for the level of individual phonemes, as children's phoneme categories are less well specified than adults' (Hazan and Barrett, 2000), but also for the lexical level since children's phonological word representations are more holistic and less segmented into phoneme units. Therefore the probability of successfully matching incomplete speech input with stored long-term representations is reduced (Nittrouer, 1996; Metsala, 1997; Mayo et al., 2003). In addition, young children are less able than older children and adults to make use of contextual cues to reconstruct noise-masked words presented in sentential context (Elliott, 1979). Concerning attention, children's immature auditory selective attention skills contribute to their difficulties with speech-in-noise perception. Children's susceptibility to informational masking has been attributed to deficits in focusing attention on auditory channels centered on signal frequencies, while ignoring nonsignal channels (Wightman and Kistler, 2005). Behavioral and ERP measures from dichotic listening paradigms provide evidence that auditory selective attention improves throughout entire childhood (Doyle, 1973; Pearson and Lane, 1991; Coch et al., 2005; Wightman et al., 2010; Gomes et al., 2012).

Owing to the mediating role of linguistic competence and selective attention, children with language or attention disorders are still more impaired than normally developing children by noise in speech perception tasks (Geffner et al., 1996; Ziegler et al., 2005, 2009). A stronger noise effect is also evident for children tested in their second language when compared to native children (Crandell and Smaldino,

Autism & Anxiety: Parents seek help for extreme reaction to loud noise

September 5, 2018

Our 12-year-old son has autism, mild intellectual disability and anxiety attacks so severe that we end up in the emergency room. Loud noises are the worst – for example the school fire alarm, thunderstorms, a balloon popping, fireworks. Any help would be greatly appreciated.



This week's "Got Questions?" answer is by Judy Reaven, a clinical psychologist and associate professor of psychiatry and pediatrics at the University of Colorado School of Medicine and Children's Hospital Colorado, in Denver. Dr. Reaven's conducted research on the effectiveness of cognitive-behavioral therapy for anxiety in adolescents with autism, with the support of an [Autism Speaks research grant](#).

Editor's note: The following information is not meant to diagnose or treat and should not take the place of personal consultation, as appropriate, with a qualified healthcare professional and/or behavioral therapist.

Thanks for the great question. It certainly sounds like your family is experiencing a very difficult situation. Anxiety symptoms and reactions are very common in individuals with autism spectrum disorder (ASD). They can interfere with functioning across home, community and school settings.

Although your son's reaction sounds more severe than most, many people with autism struggle with a range of fears, phobias and worries. These can range from a debilitating fear of, say, spiders or the dark to chronic anxiety about making mistakes or being late.

Fortunately, recent research suggests that anxiety in children and adults who have autism is quite treatable. Often, these individuals are helped by the same or similar strategies that work well in treating anxiety in the general population.

These approaches include cognitive behavior therapy, or CBT. Cognitive-behavioral approaches are well-established, evidenced-based treatments that have become the gold standard of psychosocial treatments for anxiety. [My own research](#) and that of my colleagues has demonstrated the helpfulness of modifying cognitive-behavioral approaches to address the special needs of those who have autism.

Where to begin?

You describe a number of fears that may be related to sensory sensitivities. I recommend that you begin by consulting an occupational therapist who can assess whether your son's extreme sensitivities to noises are part of a broader sensory processing disorder. If this is the case, and if your son's fears are exclusively triggered by sensory stimuli, then his symptoms may be best addressed by a sensory-focused intervention. Many occupational therapists who specialize in autism receive special training in this area.

It's common for children with ASD and anxiety to become extremely frightened in response to sensory stimuli. Perhaps – like many individuals with autism – your son also has difficulty telling you what's scaring him. Instead, he may show his fear with extreme avoidance of a situation.

For example, he might refuse to go to school after a fire drill. He might become fearful of birthday parties after being frightened by a balloon that popped unexpectedly. Other signs of extreme distress can include yelling, crying, clinging and general agitation. Because your son may have difficulty communicating, it's important to observe his behavior for these signs of distress. This can help you determine what's triggering his fears.

Avoidance versus learning to cope

Many parents go to great pains to protect their children by avoiding agitating situations. This approach is sometimes appropriate and even necessary. However, it denies individuals the opportunity to learn how to manage anxiety-provoking situations on their own.

By helping your son learn to manage his fear, you can prepare him for an unpredictable world so that he can participate in it to the maximum extent possible.

Given the severity of your son's anxiety symptoms, I suggest that you seek professional support in addition to the strategies offered here. Families whose children have milder symptoms of anxiety can try these strategies on their own – seeking professional help if symptoms worsen.

Tackling one fear at a time

I suggest making a list of your child's major fears and worries. Try to rank order them from mild to severe. To encourage success, I'd start with a mild-to-moderate fear before taking on his extreme reaction to loud noises.

Key components of a cognitive behavioral approach include introducing coping strategies such as deep breathing and "helpful thoughts" that can help a person manage fearful reactions.

For example, you can teach your son to take deep slow breaths to help manage his body's physical anxiety reactions.

"Helpful thoughts" are statements that your son can say to himself when faced with a situation that makes him anxious. For example, you can coach to your son to say, "This is a loud noise. I don't like it, but I can handle it."

To help your son to learn these strategies, I suggest you model taking deep breaths while repeating a "helpful thought" out loud.

Graded exposure

The most important step is to help your son face his fears a little at a time. We call this "graded exposure." For example, explain to your son that the two of you are going to listen to a recording of thunder. The first time, you might play the recording at a soft volume, then gradually increase the volume over time as he demonstrates increased comfort with the sounds.

Or you might try watching a video of a balloon pop – perhaps with the volume off the first time. Then he can watch a real balloon pop while standing some distance away. Over time, he can move closer and closer to the balloon.

After such exercises, you can present him with small rewards for being brave and "facing fears." Remember that even a small act of bravery – such as listening to a recording of thunder for 10 seconds – represents an important step toward handling fears. It deserves to be acknowledged.

Although graded exposure may seem counterintuitive, [research](#) indicates that this strategy is the single most effective strategy for getting over a particular fear.

I wish you and your son the very best. Please let us know how you're doing with an email to GotQuestions@autismspeaks.org.

60
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Additional Resources & Tools

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[Help for Child with Autism & Recurring Behavioral Crises: Part 2](#)

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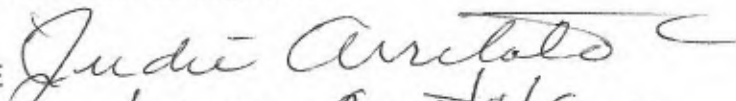


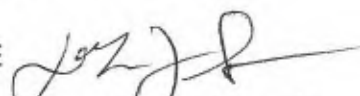
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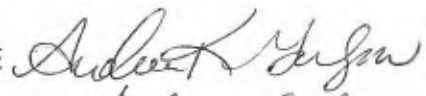
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[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

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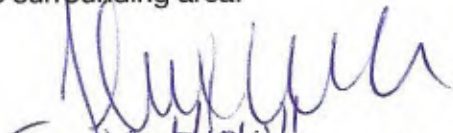
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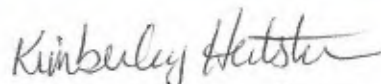
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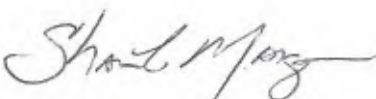
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PRINTED NAME Bert R. Freewing
ADDRESS 709 South 12th Street La Grande, OR 97850
EMAIL jeanfrewing@gmail.com

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PRINTED NAME
ADDRESS
EMAIL

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PRINTED NAME
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TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" ¹ specifically the Modelaire-Hawthorne Loop) ², hereafter referred to as the "loop", of La Grande to access the site entrance. This residential "loop" was constructed without sidewalks for a new development around the early 1960s.

According to OAR 345-022-0110, Public Services (pg. 5. April 2017) "The applicant...must address all permanent and temporary impacts of the facility on housing, traffic, safety, police and fire protection, health care and schools." ³

My impression from reviewing the application Page 17 ⁴ is that the applicant has not fully examined the final portion of the intended route nor does it fully recognize or address the need for traffic mitigation. This "loop" is the only access to/from thirty-six houses to the rest of the city. The area to the north of the "loop" is occupied by the Grande Ronde Hospital and Medical Clinic. Two blocks to the east is located the local high school and a grade school. ²

In June of 2016, the Grande Ronde Hospital petitioned the City to have a conditional use for a parking lot expansion project next to Hawthorne. The Conditional Use Permit was approved subject to the Condition of Approval that "No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to residential standards and is not designed to support commercial traffic." ⁵

The La Grande Director of Public Works, Kyle Carpenter, provided information regarding the widths for the streets in question. The two streets range from 33 feet to 37 feet in width with no sidewalks. I personally measured the area where the unpaved stem of Hawthorne leaves the "loop" to go up the hill. At the junction it measures 32 feet curb cut to curb cut and narrows to 18-21 feet in width as it goes around the corner up the hill. 6 The Public Works Director also provided pictures of the mapping system showing the existing utilities located in the "loop". 7-8. It should also be noted that from the entrance to the "loop" at Sunset Drive to the entrance of the site the road has a 16% grade.

Attachment U2 9 from the application shows an "Aerial Lift Crane to be Used During Construction" and the Transportation and Traffic Plan on page 19 10 lists a number of other vehicles anticipated to be used. Article 6.6 — Public Street Standards for the City of La Grande Section 6.6.002 states that "Collector Streets are designed to withstand normal trucks of an HS20 loading. Larger trucks are to utilize Arterial Streets where at all possible." 11 The majority of vehicles listed on page 19 exceed that limit and would be using a Local Street in addition to Arterial and Collector Streets. According to the Public Works Director the two streets in the "loop" were designed as Local Streets for residential use, able to accept the pressures of HS20 for the purpose of an occasional need such as a weekly garbage truck or an emergency vehicle but for no more than 5% of the time. The paving construction of these over 50 year old streets in the "loop" was not designed for repetitive use by vehicles heavier than a normal car. These streets in the "loop" have not been repaved, only patched when necessary, since they were first constructed.

The application does not address the "loop" specifically, but 3.1.2 (pg. 19) 10 and Table 6 (pg.17) 12 of the Transportation and Traffic Plan indicate there would be numerous vehicles using this route. Not knowing exactly just which vehicles would be on the "loop" daily but making a conservative estimate of 50 round trips (100 single) it would be a constant parade with one truck every 7.2 minutes. This is unacceptable for numerous reasons including constant excessive noise.

Not only would weight of the vehicles be a problem but the narrowness of the "loop" streets and the ninety degree blind curves that would have to be executed would be either impossible or extremely dangerous considering the turning radius for many of these large vehicles. The

already dangerous situation for a number of driveways that exit onto these "loop" streets at blind curves would be exacerbated. 13-14

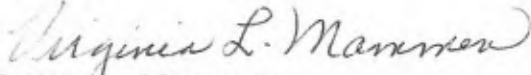
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for walking (children to school, all ages for physical training), driving, or biking. I fear there are standards that are either not being considered or they are intentionally being ignored. There should be some common sense, courtesy and respect for the impact this project would impose on any neighborhood.

Finally, La Grande Ordinance Number 3077, which adopted Oregon State Traffic Laws by reference, states in Section 17 page 8 "It shall be unlawful for any person, firm or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes." Neither Modelaire/Hawthorne Loop nor Sunset Drive are posted as truck routes. 15-16

A site review and traffic plan must be completed prior to the cite certificate being issued and not 90 days prior to construction as stated.

For the above reasons I oppose the usage of the proposed route for the construction of the B2H transmission line.

Sincerely,


Virginia L. Mammen
405 Balsa
La Grande, Oregon. 97850

gmammen@eoni.com

**TABLE 1
 STREET STANDARDS**

Functional Classification	ADT Volume	Speed (mph)	# of Travel Lanes	Travel Lane Width	Turn Lane or Median Width	Bike Lanes	Min. Bike Lane Width	On-Street parking
Downtown Arterial	10,000	20	2-3	11'	11'			both sides
Arterial	10,000	40-55	2-5	12'	4-14'	optional ⁴	5'	none
Major Collector	2,000 - 10,000	25-45	2-3	11'	12'	required	5'	one or both sides
Minor Collector	1,000 - 2,000	25-35	2	11'	none	Optional ⁵	5'	one or both sides
Local Street	0 - 1,000	15-25	2	10'	none	none	none	one or both sides

Functional Classification	Sidewalks	Min. Sidewalk Width	Planting Strip Width ¹	Total Paved Width ²	Total ROW Width ³	Private Access Spacing
Downtown Arterial	required	12'	3'6" ⁶	49'	80'	200'
Arterial	required	5'	8'	36'-72'	80'-102'	200' - 400'
Major Collector	required	5'	8'	52'-60'	62'-90'	150' - 300'
Minor Collector	required	5'	8'	30'-48'	60'-78'	75' - 150'
Local Street	required	5'	8'	28'-36'	40'-66'	Each Lot

¹ A portion of the required planting strip width may be used instead as additional sidewalk width or reduced right of way, as appropriate.

² The minimum of the paved width was calculated with the following assumptions:

Arterials: Two (2) travel lanes, four foot (4') median divider, no center turn lane, no bike lanes.

Major Collectors: Two (2) travel lanes, two (2) bike lanes, no center turn lane, parking on one (1) side.

Minor Collectors: Two (2) travel lanes, parking on one (1) side of street, no bike lanes.

Local Streets: Two (2) travel lanes, parking on one (1) side of street.

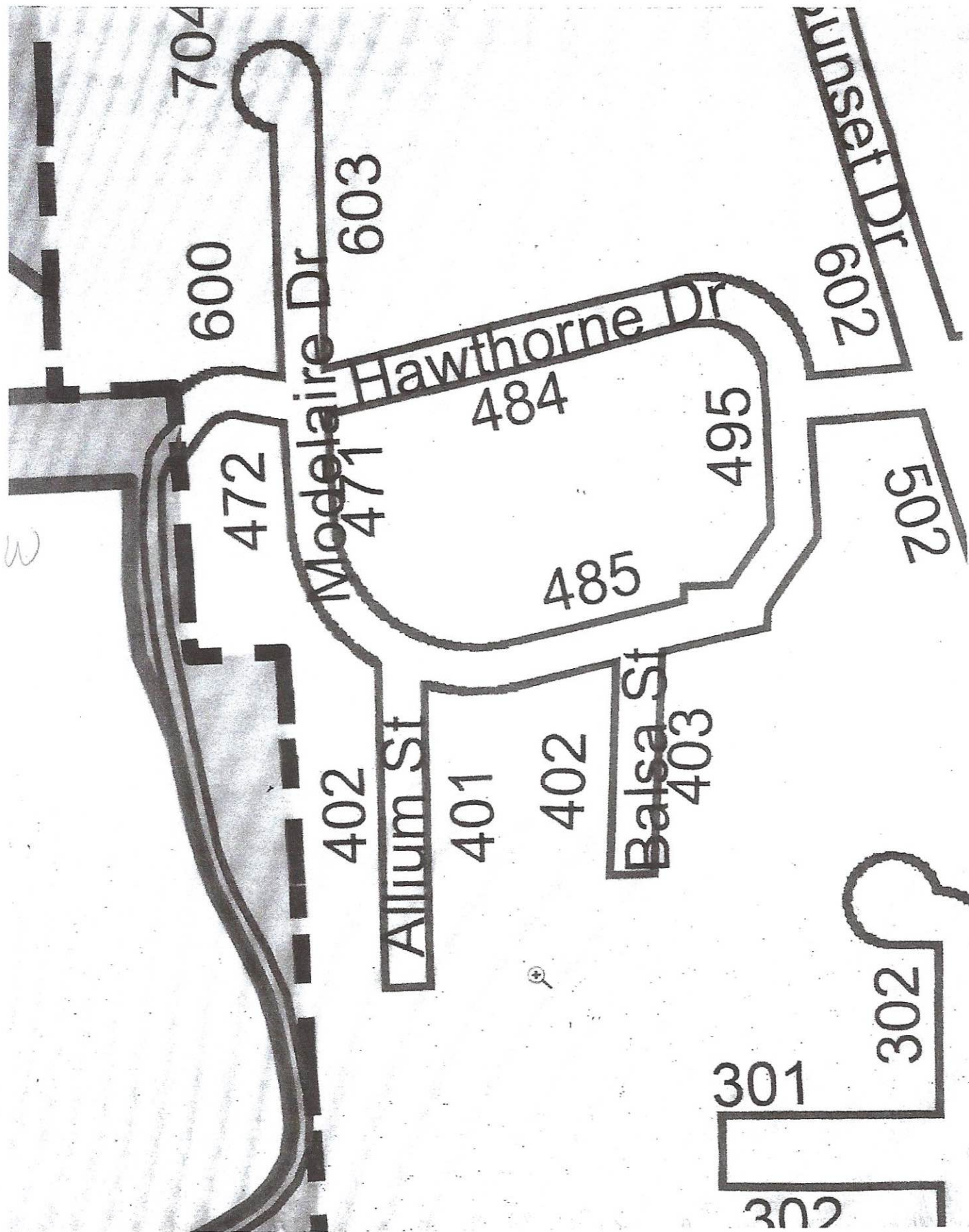
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

³ These right-of-way width ranges are for new streets.

⁴ Bike lanes should be provided on Arterials unless more desirable parallel facilities are designated and designed to accommodate bicycles.

⁵ Bike lanes should be provided on Minor Collectors where traffic volumes or other factors warrant. Otherwise, Minor Collectors should be designed and designated as shared roadway facilities with wide outside travel lanes of 14' on important bike routes.

N



5

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety. Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



Idaho Power Responses to Comments and Requests for Additional Information on the B2H APASC
from the City of La Grande
Compiled by ODOE. RAI's from the City of La Grande and Responses from IPC

		proposed helipad is a necessary supporting facility.	
U	U- Public Services include utilities such as road systems, water, sanitation services, power, and other amenities necessary for the construction.	Ordinance #2912, Series 1997 gives the City jurisdiction and control on all City street rights-of-way and Ordinance #3077, Series 2009, establishes the process and requirements for permits and licenses for uses of the streets that are not normal uses and may result in damages.	<p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p> <p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><u>Land Use Condition 9: Prior to construction in Union County, the site certificate holder shall complete the following to address traffic impacts in the county:</u></p> <p><u>a. The site certificate holder shall finalize, and submit to the department for its approval, a final county-specific transportation and traffic plan. The protective measures described in the draft Transportation and Traffic Plan in ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</u></p> <p><u>b. The site certificate holder shall work with the Union County Road Department and the City of La Grande Public Works Department to identify concerns related to Project construction traffic; and</u></p> <p><u>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</u></p> <p><u>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</u></p>

IV. CONCLUSIONS

Based on the Findings of Fact above, the Planning Commission concludes that the application meets the requirements established in LDC Articles 8.5 and other applicable codes and Ordinances.

V. ORDER AND CONDITIONS OF APPROVAL

Based on the conclusions above, the Planning Commission approves the Conditional Use Permit as requested, subject to the following Conditions of Approval:

1. No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to a residential standards and is not designed to support commercial traffic.
2. Any existing driveway curb cuts along Hawthorn Drive bordering GRH's property, that are not used for residential purposes, shall be removed and replaced with City standard improvements that exists adjacent to such areas.
3. There is a storm sewer line extending through the project area that shall to be protected. Any improvements that may affect the storm sewer line shall be reviewed and approved by the Public Works Director.

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

1. **Revisions to a Valid Conditional Use Permit:** Any variations, alterations, or changes in a valid Conditional Use Permit requested by the deed holder shall be considered in accordance with the procedures of the Land Development Code as though a new Conditional Use Permit were being applied for.
2. **Public Works Standards:** Where a development involves work within the public right-of-way, a Right-of-Way Permit shall be obtained from the Public Works Department in advance of commencing with any work in the right-of-way. All improvements within the public right-of-way shall be in conformance with the most recent adopted City of La Grande "Engineering Standard Drawings and Specifications for Construction Manual."
3. **Building Permits:** The City of La Grande Building Department shall be contacted early in the process and in advance of development to coordinate and obtain required building, plumbing, electrical and/or mechanical permits. All required permits shall be acquired in advance of construction.

VI. OTHER PERMITS AND RESTRICTIONS

The applicant and property owner is herein advised that the use of the property involved in this application may require additional permits from the City of La Grande or other local, State or Federal Agencies.

The City of La Grande land use review, approval process and any decision issued does not take the place of, or relieve the applicant of responsibility for acquiring such other permits, or satisfy any restrictions or conditions thereon. The land use decision herein does not remove, alter, or impair in any way the covenants or restrictions imposed on this property by deed or other instrument.

The land use approvals granted by this decision shall be effective only when the rights granted herein have been exercised and commenced within one (1) year of the effective date of the decision. In case such right has not been exercised and commenced or an extension obtained, the approvals granted by this decision shall become null and void. A written request for an extension of time shall be filed with the Planning Department at least thirty (30) days prior to the expiration date of the approval.



Virginia Mammen <4gmammen@gmail.com>

Modelaire Roadway Specifications

3 messages

Kyle Carpenter <KCarpenter@cityoflagrande.org>
To: "gmammen@eoni.com" <gmammen@eoni.com>

Fri, Jul 12, 2019 at 1:51 PM

I have attached a couple pictures of our mapping system that will give you a sense of where existing utilities are in Modelaire and Hawthorne. As for the widths of the roadways, I took measurements in multiple places, and found the following:

- Modelaire Drive (F Avenue) between Sunset Blvd and Hawthorne Drive is approximately 33 feet wide with a grade of about 5 Percent.
- Hawthorne Drive is approximately 32 feet wide at the bottom near the intersection of Modelaire/F Avenue and widens to about 34 feet where it intersects Modelaire at the top of the hill. The grade heading up hill is approximately 15.5 Percent.
- Modelaire Drive is generally 36 feet wide with some minor variability generally less than a foot (35' to 37'). On the southernmost segment of the roadway where the majority of the elevation gain is observed the grade is approximately 16 Percent.

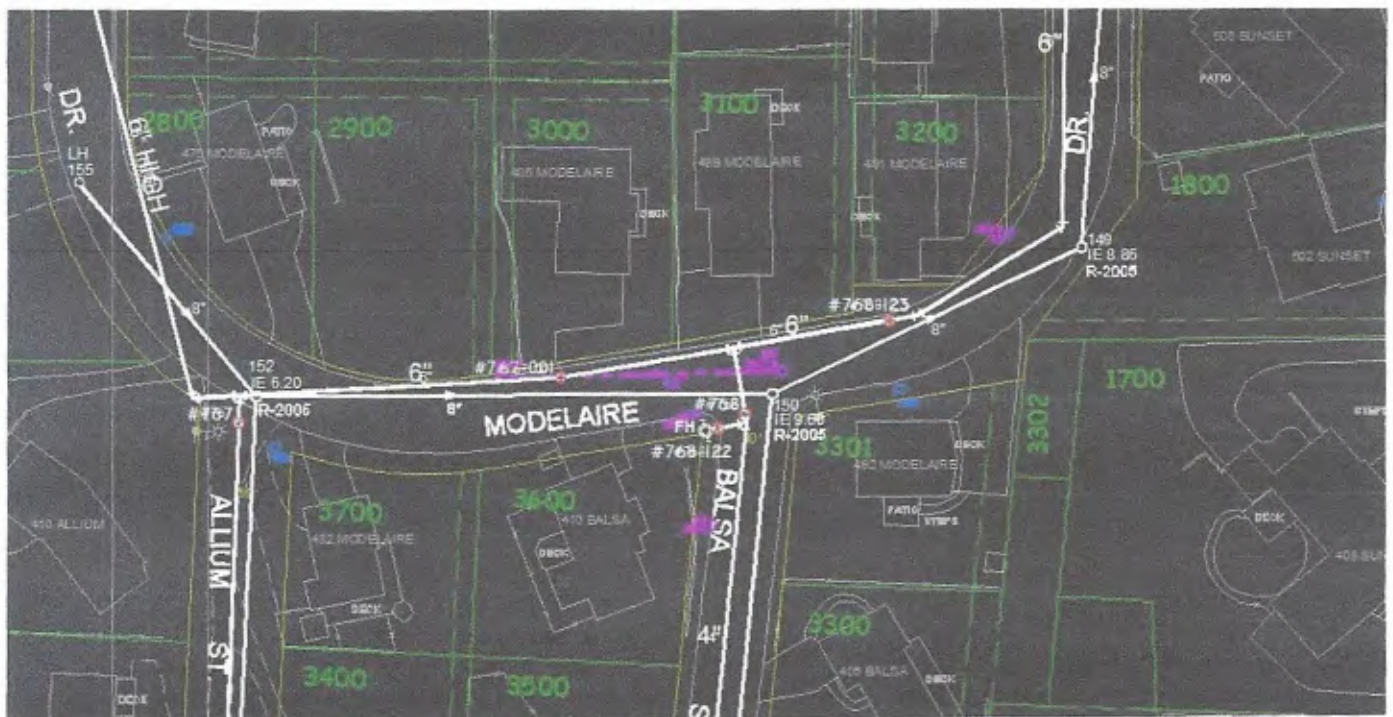
Let me know if there are any other specifications of these roadways that you are interested in that I have missed. Have a great weekend and thanks for the treats, the guys were very appreciative.

Kyle Carpenter, PE
Public Works Director
City of La Grande
Public Works
Ph: (541) 962-1325
Fax: (541) 963-4844

2 attachments

Hawthorne.jpg
150K

Modelaire.jpg
120K





attachment U2

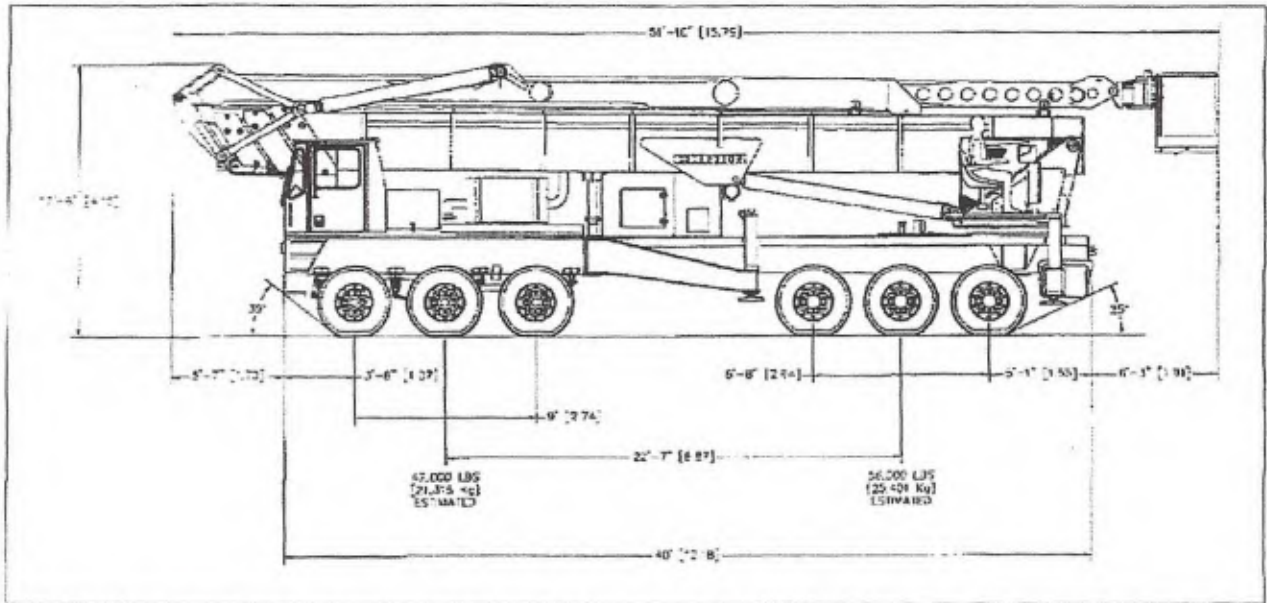


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

The following is a summary of anticipated equipment to be used for each transmission-line construction activity.

- Survey work: pickup trucks or ATVs.
- Timber removal: pickup trucks, feller bunchers, dump trucks, wood chippers.
- Road construction: pickup trucks, bulldozers, motor graders, and water trucks.
- Hole digging, installation of directly embedded structures, or foundation installation: pickup trucks, 2-ton trucks, digger derrick trucks, hole diggers, bulldozers, concrete trucks, water trucks, cranes, hydro cranes, wagon rock drills, dump trucks, and front-end loaders.
- Hauling lattice steel members, tubular poles, braces, and hardware to the structure sites: steel haul trucks, carry alls, cranes, and forklifts.
- Assembly and erection of structures: pickup trucks, 2-ton trucks, carry alls, cranes, and a heavy lift helicopter.
- Wire installation: pickups, wire reel trailers, diesel tractors, cranes, 5-ton boom trucks, splicing trucks, three drum pullers, single drum pullers, tensioner, sagging dozers, carry-alls, static wire reel trailers, bucket trucks, and a light duty helicopter.
- Final cleanup, reclamation, and restoration: pickup trucks, 2-ton trucks, bulldozers, motor graders, dump trucks, front-end loaders, hydro-seed truck, and water trucks.

The highest level of traffic will be when the wire stringing operations begin while several other operations are occurring at the same time, which will likely include ROW clearing, installing foundations, hauling steel, and assembling and erecting structures. For the station work, the highest level of traffic will be during site grading and foundation installation. For the communication station sites, the highest level of traffic will be during grading and site preparation.

Detailed estimates of trips generated by transporting Project construction equipment will be provided by the construction contractor prior to construction.

3.1.3 Traffic Related to Timber Removal

In forested areas, the Project will require removal of timber from the Project ROW and for construction and improvement of access roads. Specific timber harvest plans have not been finalized. Logs from timber clearing may be transported to nearby sawmills. Decisions regarding transportation routes for harvested timber will be made following completion of a timber harvest plan, and the number of log truck trips will be estimated when the timber harvest plan has been finalized. Logging slash will remain onsite if possible. For additional discussion regarding removal of timber in forested areas, see Exhibit K, Attachment K-2, ROW Clearing Assessment.

3.1.4 Impacts to V/C Ratios

Based on the estimated trip generation numbers in Tables 4 and 6, a maximum of approximately 1,294 daily one-way vehicle trips are expected within any one construction spread. To facilitate traffic and other analyses, the two construction spreads are divided into smaller sections based on similar construction windows and seasonal weather restrictions. Not all construction sections will have the same number of concurrent construction activities, depending on how the construction contractor sequences and executes the Project. Some sections will have fewer daily vehicle trips. For the purposes of the traffic analysis, the spreads are divided into five sections with multi-use areas that could have additive traffic impacts. The sections are assumed to have approximately equal levels of activity. The 1,294 daily one-way trips per spread divided over five sections of more concentrated traffic results in 259 daily one-

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

Upon the request of the La Grande City Council, a variety of street design standards have been reviewed and are now incorporated in the Land Development Code.

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

This classification will cover those streets that are designed to meet the standards for an expected life of twenty (20) years or more. The attached drawings shall be the minimum standard for those streets in this classification. All streets designated as Federal Aid Urban Streets (F.A.U.) shall be constructed under these design standards. Streets in this designation shall be constructed with sidewalks when at all possible in an effort to increase pedestrian safety. Collector streets are designed to withstand normal trucks of an HS 20 loading. Larger trucks are to utilize Arterial streets where at all possible. This level of development shall be the ultimate goal for all streets within the City of La Grande.

Possible means of financing available for this Class shall be methods A, B, C, D, E, F, G, and H in Section 6.6.006.

A. Advantages

1. The construction life is extended to a period above other City standards.
2. The visible aesthetics in relationship to having curbs and a blacktop surface with landscaping or concrete driveways and a sidewalk is generally appealing to the public.
3. Easy maintenance for the Public Works Department for cleaning and minor repair.
4. Storm sewer drainage is confined within the bounds of the curbs during minor flooding periods.
5. Parking is restricted to a solid barrier, that being the curb; this restricts parking in the area on the back side of the curb and confines travel to the street surface.
6. Defined areas for possible cross walks, signs, power poles, and other utilities that are restricted to the outside areas behind the curbs.
7. It allows for a wide range of financing methods and is to City standards for a ten (10) year Bancroft bonding.
8. Provides a dust free surface.

B. Disadvantages

1. The extreme high level of cost that is incurred with this type of development.

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

Streets constructed in this classification shall be constructed to the same standards as Class I Streets with the exception of the form of drainage system. These streets shall meet the standards as shown on the attached drawing. This level of construction shall be only utilized in substitution for Class I Streets when it is determined by the City Council at the recommendation of the City Engineer or Engineering Superintendent, that an adequate drainage system cannot be installed for a Class I Street.

Table 6. Construction Vehicle Trips per Day per Construction Spread

Construction Crew Type	Construction Vehicles					
	Light Construction Vehicles			Heavy Construction Vehicles		
	Number of Pickups/ Mechanic Trucks (per day)	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)	Number of Other Vehicles	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)
Substation Construction	20	2	40	5	2	10
ROW Clearing	9	4	36	5	4	20
Roads/ Pad Grading	9	4	36	9	2	18
Foundations	9	2	18	5	8	40
Tower Lacing (assembly)	27	2	54	0	0	0
Tower Setting (erection)	20	2	40	0	0	0
Wire Stringing	9	4	36	9	4	36
Restoration	3	2	6	0	0	0
Blasting	5	4	20	0	0	0
Material Delivery	20	8	160	12	2	24
Mechanic and Equipment Mgmt.	5	6	30	0	0	0
Refueling	0	0	0	5	4	20
Dust Control	0	0	0	5	4	20
Construction Inspection	5	8	40	0	0	0
Concrete Testing	5	4	20	0	0	0
Environmental Compliance	9	6	54	0	0	0
Surveyors	5	3	30	0	0	0
Totals	—	—	620	—	—	188

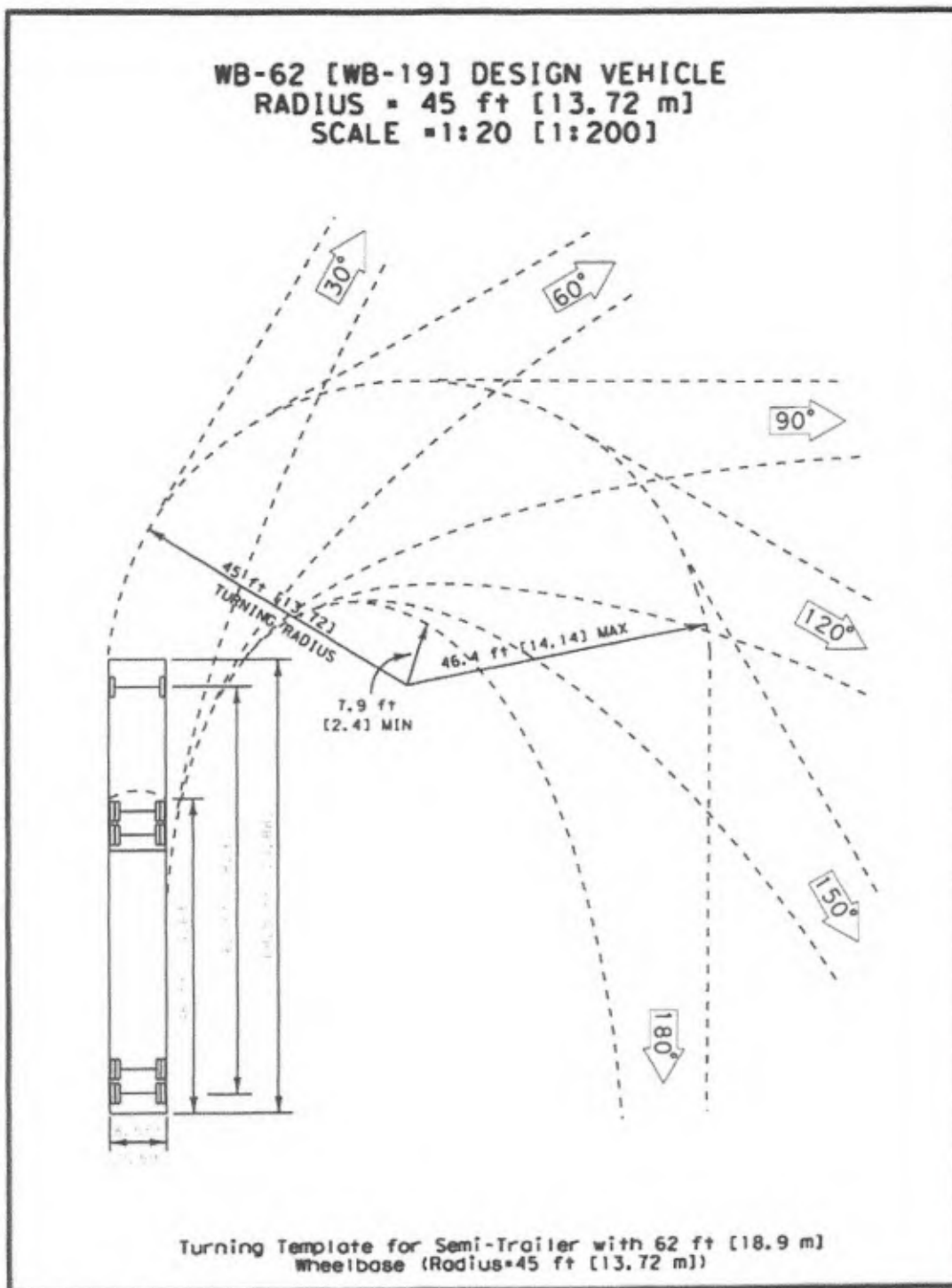
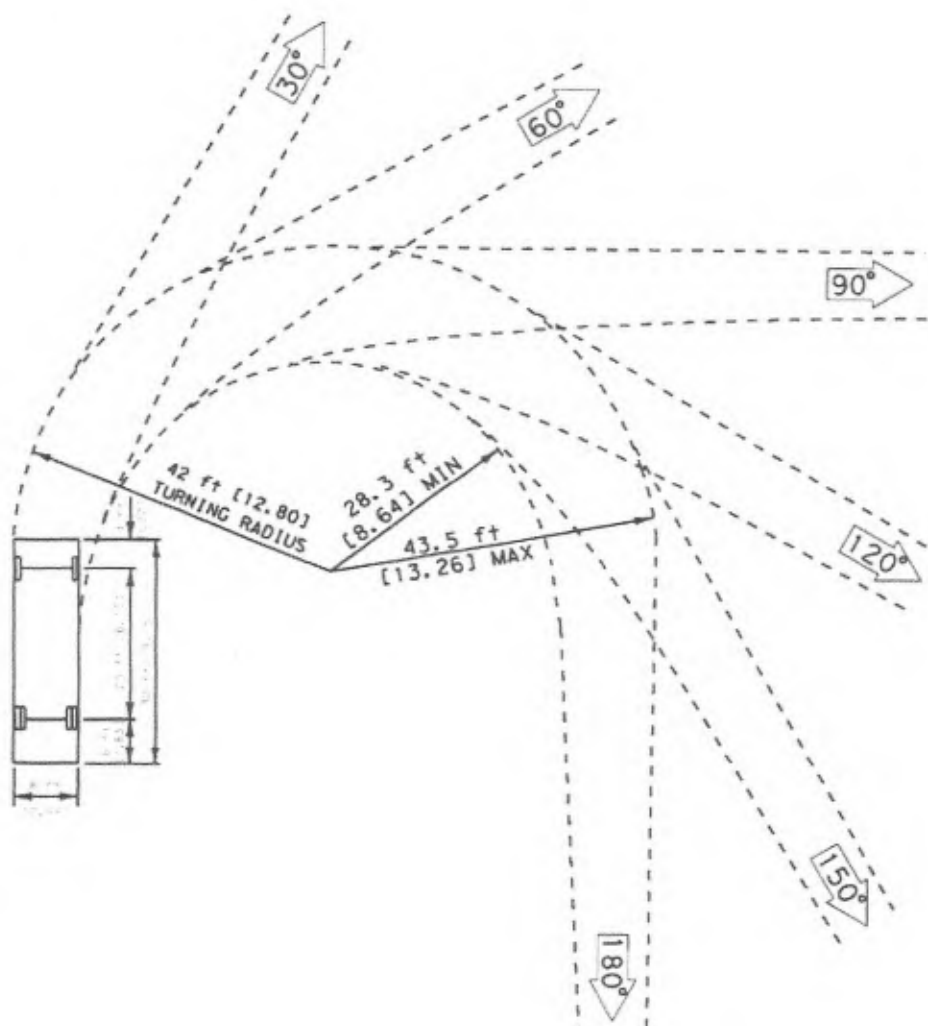


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

SINGLE UNIT (SU) TRUCK DESIGN VEHICLE
TURNING RADIUS = 42 ft [12.80 m]
SCALE = 1:20 [1:200]



Turning Template for Single Unit Trucks or Buses

Exhibit 15

**CITY OF LA GRANDE
ORDINANCE NUMBER 3077
SERIES 2009**

**AN ORDINANCE CONTROLLING VEHICULAR AND PEDESTRIAN TRAFFIC, PARADES
AND PROCESSIONS AND ISSUANCE OF PERMITS; PROVIDING PENALTIES; AND
REPEALING ORDINANCE NUMBER 2845, SERIES 1993; ALL AMENDING ORDINANCES
AND ALL OTHER ORDINANCES OR PARTS OF ORDINANCES IN CONFLICT HERewith;
AND DECLARING AN EFFECTIVE DATE**

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

Section 1. This Ordinance may be cited as the City of La Grande Uniform Traffic Ordinance.

Section 2. APPLICABILITY OF STATE TRAFFIC LAWS.

Oregon Revised Statutes, Chapter 153, and the Oregon Vehicle Code, ORS Chapter 801 and 822, as now constituted, are adopted by reference. Violation of an adopted provision of those chapters is an offense against the City.

Section 3. DEFINITIONS

In addition to those definitions contained in the Oregon state Motor Vehicle Code, the following words or phrases, except where the context clearly indicates a different meaning, shall mean:

a. Alley

A street or highway primarily intended to provide access to the rear or side of lots or buildings in urban areas and not intended for through vehicular traffic.

b. Bicycle

A bicycle is a vehicle that:

1. Is designed to be operated on the ground on wheels;
2. has a seat or saddle for use of the rider;
3. is designed to travel with not more than three (3) wheels in contact with the ground;
4. is propelled exclusively by human power; and,
5. has every wheel more than fourteen inches (14") in diameter or two (2) tandem wheels, either of which is more than fourteen inches (14") in diameter.

c. Bicycle Lane

That part of the highway, adjacent to the roadway, designated by official signs or markings for use by persons riding bicycles, except as otherwise specifically provided by law.

d. Bicycle Path

A public way, not part of a highway, which is designated by official signs or markings for use by persons riding bicycles, except as otherwise specifically provided by law.

e. Block

The part of one side of a street lying between the two (2) nearest cross streets.

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

The applicant shall submit an application to the City Manager or designee, showing the terminal points of the purported movement; the proposed route; the nature of the movement requested, including the weight and dimensions of the vehicle, load, machine, building, or structure to be moved; the time, date and duration of the proposed movement.

b. Special Movement Permit

A permit shall be required to move any vehicle, structure, or load on, or to access a street when, after preparation for movement, the vehicle, structure or load exceeds fourteen feet (14') in height, requires the use of guy wires, or could result in the blockage of a street. An approved application may serve as a permit, and a copy of the approved application shall be provided to the applicant.

Section 17. TRUCK ROUTES

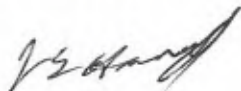
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, pounds specifically picking up deliveries or making deliveries to any business or residence located on a street that is not a truck route will be exempted if the vehicle is driven from the truck route to the destination in the shortest, most direct, and safest route.
- c. The use of Jacob brakes shall not be allowed within the city limits of La Grande, Oregon.
- d. Truck routes will be posted as follows:
 1. Walnut street north from the city limits to C Avenue;
 2. C Avenue east from Walnut Street to Gekeler Avenue;
 3. Gekeler Avenue east to the city limits;
 4. 12th street south from Gekeler Avenue to the city limits;
 5. 2nd Street south from the city limits to Adams Avenue;
 6. Monroe Avenue east from Spruce Street to Highway 82;
 7. Jackson Avenue east from Spruce Street, and
 8. Spruce Street south from the city limits to Monroe.

Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement officer may cause the vehicle to be towed and stored at the owner's expense. The owner shall be liable for the costs of towing and storing, notwithstanding that the vehicle was parked by another or that the vehicle was initially parked in a safe manner but subsequently became an obstruction or hazard.

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SIGNATURE



PRINTED NAME

James E. Howell II

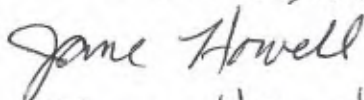
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PRINTED NAME

Jane Howell

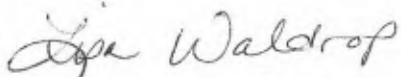
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Lisa Waldrop

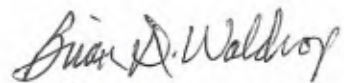
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BRIAN D. WALDROP

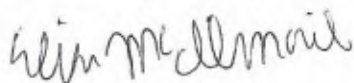
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EUSE MCILMAIL

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SIGNATURE

PRINTED NAME

ADDRESS

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Jessie Huxell
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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

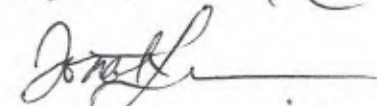

C. Huxell
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CHRIS Huxell @ EMAIL. Com

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Jonah Lindeman
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Marie Skinner
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Blake Bars
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SIGNATURE

D. Dale Mammen

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D. Dale Mammen

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Jim Kreider

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Judie Arritola

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John Barutz

PRINTED NAME


John Barutz


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484 Hawthorne LG, OR 97850


EMAIL


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SIGNATURE 
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SIGNATURE: 

PRINTED NAME Shawn K. Mangum

ADDRESS 2905 E. M. Ave,

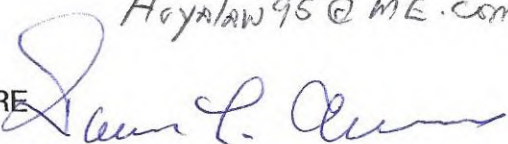
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SIGNATURE

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CONNIE L. ALLEN 541-9637720
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N/A

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

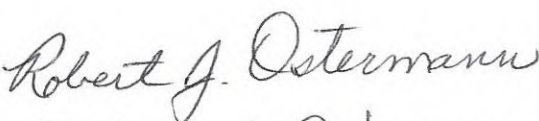

Linda Snyder
491 Modelaire Dr

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PRINTED NAME

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Robert J. Ostermann
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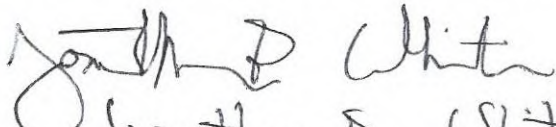
PRINTED NAME

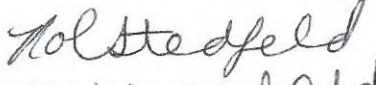
ADDRESS


EMAIL

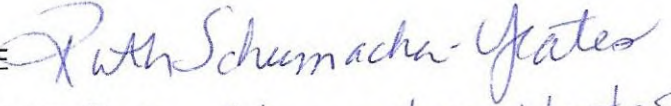

Robin J. Ostermann
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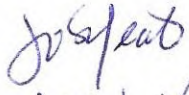
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SIGNATURE 
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PRINTED NAME Jean BAPH

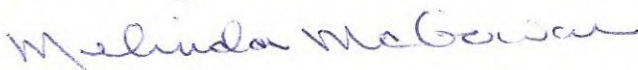
ADDRESS 1509 MADISON AVE LaGrande, OR 97850


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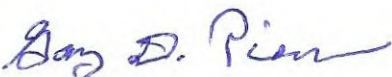
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SIGNATURE 

PRINTED NAME Gary D. Pierson

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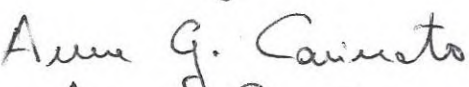
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PRINTED NAME ANGELA Sherer

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SIGNATURE *Robert J. Sherer*
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SIGNATURE *Merle E. Comfort*
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SIGNATURE *Caroline Kaye Juniper*
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EMAIL

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SIGNATURE *Gerald D. Juniper*
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PRINTED NAME
ADDRESS
EMAIL

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Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Elizabeth Anbach

Mailing Address (mandatory) 71384-A Hwy 207
Echo OR 97820

Phone Number (optional) () _____ Email Address (optional) _____

Today's Date: 6/27/19

Do you wish to make oral public testimony at this Hearing: Yes ☒ No ☐ Maybe

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

<p style="text-align: right;">Page 34</p> <p>1 communities served along this right-of-way that utilize 2 Bonneville Power Administration energy, will be able to 3 have their rates affected by this in a positive manner. 4 Bonneville will be able to experience the net savings of 5 the energy imbalance market, which is a net benefit to 6 all of the ratepayers in this region. 7 The additional construction of the project, of 8 course, is a time-limiting benefit within the region, 9 but also the construction of the project should also 10 benefit the entire region wherever the work occurs. 11 We have a lot of electrical workers that would 12 be benefited from this kind of construction. Our 13 generation facilities, all of you are familiar with 14 Boardman, the coal plant and the building of the 15 gas-fired plant. Those additional capacities continue 16 to be levied throughout the transmission corridors. 17 I think that's all I'll submit for oral 18 comment. We will be submitting written testimony that 19 outlines some of those benefits with the electrical or 20 the energy imbalance market, as well as some of the 21 other workforce studies throughout the region. 22 Thank you. 23 HEARING OFFICER WEBSTER: Thank you very much. 24 Next up is Brian Doherty. 25 MR. BRIAN DOHERTY: Hello. My name is Brian</p>	<p style="text-align: right;">Page 36</p> <p>1 usefulness of our property. It will limit the future 2 development opportunities on our property. It will make 3 farming more expensive, less efficient, and our 4 production will be lowered. We can't afford that. 5 We have never been "not my backyard" people, 6 our family. But if you're going to cut a swath through 7 our land 250 feet wide, make the compensation fair. 8 Paying for an easement with a single payment, with the 9 possibility of a judge determining what's fair, doesn't 10 sound like a good deal to us. 11 In 2012, we had the federal government shut 12 down the installation of windmills on our property. I'm 13 not sure we ever got the true explanation of why that 14 was done. 15 In the early 1980s, my father had irrigation 16 that he legally developed on the west side of our 17 property shut down by the State with regulations that 18 came later on the critical groundwater area. This was 19 an economic blow that was very difficult for us to 20 overcome. Forgive us if we have misgivings about what 21 the government will deem fair. 22 I don't believe I have the political or 23 economic clout to stop Idaho Power, PacifiCorp, and BPA. 24 But I would like to propose an ongoing lease payment 25 based on each tower or a portion of receipts from</p>
<p style="text-align: right;">Page 35</p> <p>1 Doherty, B-r-i-a-n, D-o-h-e-r-t-y. My address is 70516 2 Highway 207 in Lexington, Oregon. 3 As I said, my name is Brian Doherty. I'm a 4 fourth-generation dryland wheat farmer in central Morrow 5 County. I have five children. My wife Peggy and my son 6 Dan are here with me today. 7 The B2H project will cut a nearly 4-mile swath 8 through our family's farm. My great-grandfather 9 established our farm at Sandhollow in 1885. It's not an 10 easy place to farm and survive economically. And I 11 think some of my neighbors would agree with me on that. 12 Over the years our family has supported 13 development that improved life for everyone in our area. 14 We have over 20 miles of state and county roads cutting 15 through our property. With right-of-ways, that's a lot 16 of land removed from production. 17 There's a substation just above our farmstead 18 and many standard power lines on our property. In 19 addition, there are phone lines, fiberoptic lines, and a 20 gravel borrow pit for the State. Historically we have 21 been very cooperative with these projects for the 22 greater good. 23 I oppose the B2H project coming through my 24 family's property as it is currently proposed. This 25 project will permanently change the landscape and</p>	<p style="text-align: right;">Page 37</p> <p>1 wielding costs returned to the landowner based on how 2 many towers are on their land. And I'd like to credit 3 my neighbor Roger Morter for that idea. 4 You can respond that it isn't done this way, 5 but that doesn't mean it can't be. I think most of the 6 landowners would find this more agreeable. We are not 7 opposed to prudent development for the common good. But 8 we are losing more than the land under these towers. 9 My view of the Gleason Butte from my tractor 10 seat will forever be altered. I love that view, I've 11 earned that view. We can work with you, but be fair. 12 Recognize that we are giving up more than an easement 13 here. Compensate us fairly, that's all we ask. 14 Thank you. 15 HEARING OFFICER WEBSTER: Next up is Elizabeth 16 Ashbeck. 17 MS. ELIZABETH ASHBECK: E-l-i-z-a-b-e-t-h, 18 A-s-h-b-e-c-k. Mailing address 71384-A, as in "apple," 19 Highway 207, Echo, Oregon 97826. The reason why it's in 20 Echo and not Lexington is they won't deliver to where we 21 live. So we go 6 miles to go get our mail. 22 Which is why I'm here. I don't have anything 23 on any studies. I have been in agreement with Sam and 24 Brian both of what they have said. I appreciate your 25 time.</p>

<p style="text-align: right;">Page 38</p> <p>1 Mine is more of I married a farmer. I'm 2 originally from Portland, but I married a farmer, 3 seventh generation. We have one son, and we hope to be 4 a third generation. 5 Where we put our mobile home, our home where 6 we raised our son, is right, this line goes right behind 7 us. It's on our land and it goes right behind us. We 8 have one of the best views ever, I think per Brian. 9 Where the line is going is my favorite spot. I can see 10 Mount Hood, Mount Adams, and Mount St. Helens on a clear 11 day from our top, right where this line is going. It's 12 where I love to spend our time when it's not in crop, we 13 do crop rotation. 14 My hardest part is if you're not from this 15 area, you might not understand the land and how it 16 works. We border the two men who just spoke. And so 17 when there is a fire from one of these, it will wipe out 18 all of us that are bordering each other. There is no 19 way to stop a fire. We saw that in Morrow in the fires 20 that were along the river this last year. A farmer died 21 trying to put it out with his tractor. So that's very 22 real. 23 The right-of-ways that have been in the first 24 meeting, from the first meeting Idaho Power said they 25 would just condemn our land if we did not agree to this</p>	<p style="text-align: right;">Page 40</p> <p>1 you go out here, once the lines are open out here they 2 open up. My concern is, we are only one, one house 3 right there on Melville Lane, we're the only one. We 4 were told we were the path of least resistance because 5 we are the only one. I understand that, being a house. 6 So my concern is, is once that line is open 7 and you put in more lines, where does that leave our 8 family farm? I don't have any stats on that. And they 9 can say they don't know, but to me that risk is too 10 high. And so that's really -- I don't know how to make 11 stats on that because once it's opened you can't close 12 it because it's there. 13 So how does that change our way of live and 14 where we live? And we've lived there for the last 15 25 years. They have farmed there a lot longer, but we 16 have lived there for 25 years. 17 And so I do appreciate your time. I know that 18 you probably don't know what the land looks like since 19 you haven't been out there. But I do invite you. You 20 have my address, you can come out and see if you would 21 like. 22 So that's it. Thank you. 23 HEARING OFFICER WEBSTER: Thank you. 24 Next up is Chris Rauch. 25 MR. CHRIS RAUCH: Chris Rauch, C-h-r-i-s,</p>
<p style="text-align: right;">Page 39</p> <p>1 process. So from the get-go 10 years ago, it has been 2 stressful, to say the least, to have that be our first 3 meeting here, except for in a different room. 4 So my concern is what was said -- and I didn't 5 get your name, I apologize, and I'm sorry, you just took 6 a bite so I won't... But I spoke with -- we could do 7 comments or questions last time in our meetings here to 8 Idaho Power about once a corridor is open, the 9 possibility of more lines. And as she said, that once a 10 line is open, they won't call it co-locations; it's much 11 easier to do lines down the same corridor. Makes total 12 sense. Didn't you say that? Once there's a line it's 13 easier to go down where a line is. You said 14 co-locations? 15 MS. TARDAEWETHER: Yes, the siting 16 opportunity. 17 MS. ELIZABETH ASHBECK: Siting opportunity. 18 I'm using wrong words. 19 So once there is a line though it's easier to 20 add another line; is that correct? 21 MS. TARDAEWETHER: It depends. 22 MS. ELIZABETH ASHBECK: Yes. Thank you. I 23 know you're shaking your head no. 24 But you see them. I've just taken pictures 25 along -- you can just go out here -- not out here. If</p>	<p style="text-align: right;">Page 41</p> <p>1 R-a-u-c-h. Just like it doesn't sound. Address, 72967 2 Strawberry Lane, Lexington, Oregon. I'm managing 3 partner of North Lex Power And Land. I'm also managing 4 partner and owner of Starvation Farms. And part of this 5 runs right through part of this, or both of us. 6 Wouldn't it be good if this gentleman back 7 here with the maps could have had it up here so these 8 landowners coming up here could have just looked at it? 9 It would have helped somewhat. 10 But I want to stress or put my 2 cents in. 11 North Lex Power And Land, its managing partner is pretty 12 much neutral in this project. Starvation Farms' owner, 13 I'm basically neutral. The one concern I would like to 14 see done probably -- I know how some of these things 15 work. If they could have put it right on the property 16 line it would have been less problematic, put it that 17 way, between me and my neighbor or just on my property 18 line because some of it's strictly on ours. 19 Being off to the side is a bit of a concern as 20 a farmer. It does add cost, it's kind of a pain in the 21 ass. I'm being quite honest. 22 The other two concerns is for North Lex Power 23 And Land, and they are actually directed not to you 24 guys. There's like two questions basically directed to 25 Idaho Power. One, on part of this land there's already</p>

August 21, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR 97301

RECEIVED

AUG 22 2019

Department of Energy

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2019; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

I purchased the property of 2104 Owyhee Lake, Nyssa Oregon on November 8th, 2018. I inquired if this property was Commercial or all Agriculture, this was to determine the sale for the purpose of purchasing. I invested my life savings into this property for Mine, My Daughters and Grandchildren's future. Janet Aston, Miranda Aston, Tim Proesch (refer to as "Our" "We") plan on developing an Oasis for others to enjoy the beauty and natural habitat that this land has to offer.

I was blindsided with the development of the B2H Project on June 16th, 2019 for a public meeting to be held on June 18th. It was NOT disclosed to me via the previous owners or the Title Company that this property was a potential Easement or Utility Corridor that was/is in the process. We specifically asked if the power line project was a possibility at the closing, and was informed that it had been dead for 10 years. The previous owners had received a notice 4 months prior to closing on the sale.

Our plan to develop on this project consists of placing a Home for Miranda Aston and Tim Proesch in the exact location that Idaho Power has targeted. In addition, we plan to utilize the property as Camping, Restaurant, Events open to the public (Weddings, Family Reunions, Music, Fishing, Retreats, and Environment Educational Retreats. I have already been approached to possibly host 200+ 6th graders for a natural habitat educational retreat.

By placing this powerline along the proposed route, we would be unable to continue with the future plans for the Oasis, which will result in decreased property value and quality of the environment, which would lead to a loss for future taxable revenue for Malheur County and the State of Oregon. This route would also take money that is needed for public schools and the county's economical growth.

We have pictures and have seen some of the natural habitat that exists on this land. (Fox, Cougars, Pheasants, kilter birds and their eggs, Turkey, Fish, Turtles, Cows, Horses, Deer). Placing a power line would be detrimental to the Existing Humans and Natural wildlife.

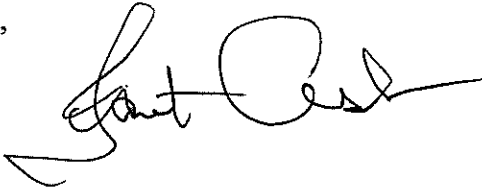
I was informed that there are other routes that exist and/or can be developed without affecting the Public's lives and future.

The 2002 Resource Management Plan of the Bureau of Land Management-Vale District page 109 states that the "designation of right-of-way corridors and encourages use of rights-of-way in-common to minimize environmental impacts and the proliferation of separate rights-of-way. BLM policy, as described in BLM Manual 2801.13B1, is to encourage prospective applicants to locate their proposals within corridors." Page 110 of the 2002 Resource Management Plan states, "The OWFEIS (see Map 7 of the OWFEIS) recognized the existing constructed 500-kV PP&L power line route as a primary recognized existing route for location of future power line interties." We believe that Idaho Power should take this proposed route back to the Bureau of Land Management and revise the route closer to the primary recognized existing route, PP&L power line. The 2002 RMP of the BLM intended to keep future power line routes, such as the one being proposed, within the existing power line corridor. This new proposal contradicts the original intentions of protecting EFU land. Agriculture land in Malheur County is detrimental to the success of our toil and the future of generations to come.

As a newly Widowed Spouse, I purchased this property with good faith that it was available to develop and invest in the future of 2104 Owyhee Lake property, and build the upcoming Owyhee Oasis project.

I sincerely ask that you deny this proposal, and consider the local land owners of their way of living and making an honest future for the Human Race.

Regards,

A handwritten signature in black ink, appearing to read 'Janet Aston', with a stylized flourish at the end.

Janet Aston - Home

South Jordan, UT 84009

801-280-2606 / cell: 801-541-0650

Janet_aston@msn.com

Janet Aston – Land Owner:

2104 Owyhee Lake

Nyssa, OR 97913

ESTERSON Sarah * ODOE

From: Owyhee Oasis <owyheeoasis@gmail.com>
Sent: Wednesday, August 21, 2019 9:55 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 09/28/2018; Draft Proposed Order 05/23/2019

Dear Chair Beyeler and Members of the Council:

I am writing you today because of the proposed B2H Transmission line. If approved, this project will negatively impact my family and I directly. My family and I have lived in the area for a few years and as of November, 2018 have been living and thriving in the lower Owyhee River area as seen in Idaho Power Malheur County Map 125. My Fiance, Mother, and I are turning the property into a recreational getaway. We want to breath life back into Nyssa by bringing people to the area that otherwise wouldn't visit. We want to give back to our community in a positive way. We are going to build our house right where they want to put the tower. I have 4 children ages 9, 4, 2, & 1 and I do not want to see them raised under, near or around these toxic power lines. When speaking to Idaho power to "ease our concerns" we were told they could offer noise canceling blinds and that we would hardly notice because they would be running in the very early morning while we sleep. THIS IS NOT OKAY WITH ME IN ANY WAY! this is my family and i's livelihoods and safety. We bought this property out in the country to continue to pursue as natural of a lifestyle as possible and this project goes against everything I believe in.

During the initial showing of the property (2104 Owyhee lake road) we were told that the "idaho power thing is done and over with, nothing to worry about." There is nothing in the title showing any previous easements or surveys done to the property. We were totally blindsided with this project. Our neighbors brought it to our attention June 16,2019 that there was a public comment meeting on June 18,2019. I had outpatient surgery on the morning of June 18, 2019. My fiance' Tim Proesch luckily was able to make that meeting after getting me dropped off at home.

We had a private meeting with the neighbors affected in the Owyhee river area and Idaho Power on July 30, 2019 in the Vale, OR Grange Hall. This meeting, according to Idaho power, was to sit down together in a neutral environment to express any concerns, try to work through those concerns, and to see if there were any agreements we could come to in order to make this B2H work for us personally. We were told that whether we liked it or not Idaho Power was coming through with the line because they have worked tirelessly over the last 12+ years on this project. We reminded Idaho power that our property specifically has been for sale for the last 4 years or so and that they had multiple opportunities to procure the property if they had wanted. We were told that the previous owners (Ron and Opal Wright) signed off on this project and that we would have to subpoena any conversations that were had between them. We were threatened with imminent domain repossession, while our neighbors were promised new Pivots or any grounding materials needed to ensure that the line would not effect his pivots or his crops. The land surveys that we were given by Idaho Power showed gophers, pheasants, killdeer, gopher snake and a few others. What they failed to show, that I have seen since living here are Cougars, Coyotes, Greater Sandhill Cranes, and Rattlesnakes that pass through or around our property. There are Wild Turkeys, Great Basin Spadefoot Toads, Western Painted Turtles, Ten-Lined June Beetle, and katydids (it recently started, and there are hundreds of them) that breed on the property. There are so many more.

From my understanding there are other existing routes on public land that they can consider, or reconsider that would result in far less devastation to the county, environment, locals, and my children. I am urging Oregon

EFSC to deny this site certificate and force Idaho Power back to the drawing board to apply for alternate routes; preferably on PUBLIC land. Please helps us to preserve the beautiful Owyhee River area AS IS.

Thank you for your time Regards,
Miranda Aston

2104 Owyhee Lake Road
Nyssa, Oregon 97913
owyheeoasis@gmail.com
971-270-4479

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 17, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.

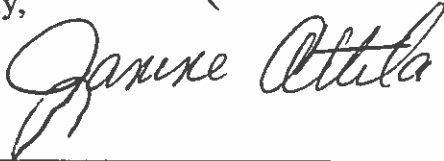
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,



Name: Janine Attila

Address: 603 Hillcrest Dr.
La Grande, OR 97850

August 18, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Siting Senior Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

I am an Eastern Oregonian and have traveled and recreated in the vicinity of Hilgard State Park for many years. I have concerns about the steep slopes, soils hazards, landslide risks, and erosion impacts that the construction of the Boardman to Hemingway Transmission line will pose in an already dangerous canyon.

Re: Soil Protection - **Drill site 95/3 and 95/4 on unstable and steep slopes**
345-022-0020

(c) ...The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500 kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 95/3 and 95/4 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. (sheet 3 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

95/3 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 - Angle change along alignment; Road and railroad crossing

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5, 6

"PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program."

Idaho Power Corporation, in Exhibit H 2.2.4 states *"The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard."* Idaho Power Corporation admits in ASC page B-12 that *"The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes presenting design and construction challenges."* IPCs stated original intention to the EFSC was the following: *"Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line."*

Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the winter storms and the spring melt can be precipitous and unpredictable.

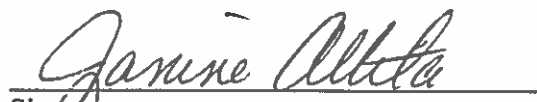

The area surrounding the drill site 95/3 and 95/4 is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

Conclusion and Requested Relief:

Drill site 95/3 and 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002 should be removed for consideration as a site for a transmission "facility." While Idaho Power Corporation attempts to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.

Sincerely,

	
Signature	Printed Name:
Mailing Address: 603 Hillcrest Dr. La Grande, OR. 97850	

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; Soil Protection

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

August 14, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: 52H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project
9/28/2018; Draft Proposed Order 5/23/2019

To: Chairmen Beyeler and Members of the Council

I appreciate the opportunity to comment on the B2H Draft Proposed Order. The Oregon National Historic Trail will be significantly affected by the B2H Transmission Line.

The Draft Proposed Order identifies significant impacts to the Oregon Trail in several Exhibits, including Exhibit C: Property Location and Maps; Exhibit L: Protected Areas; Exhibit R: Scenic Aesthetic Values; Exhibit S: Cultural Resources; Exhibit T: Recreational Facilities; and Exhibit X: Noise.

B2H crosses the Oregon Trail at least 8 times. EFSC has done a reasonable job of protecting the Trail during construction and operation, if the proposed requirements are followed, **except at the Oregon Trail Interpretive Center at Flagstaff Hill.**

The B2H Transmission Line should be buried for approximately 2 to 2 ½ miles to comply with the exhibits indicated above. Idaho Power has from the early years refused to do any significant analysis for this option. IPC uses cost as the reason for stating that undergrounding is not feasible. Cost is not a specific standard, and costs are the responsibility of the Oregon Public Utilities Commission during rate considerations. EFSC has determined that IPC has the Financial ability even if some partners choose to not participate, so reasonable cost should not be a determining factor for EFSC.

EFSC should refuse to approve the Draft Project Order for the following reasons:


1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," in the context of residential sleeping areas; however, certainly for tourists and visitors to the Interpretive Center and hiking trails noise will be disturbing. Map 23 in Attachment X-1 does not even show the Oregon Trail.
2. Within OAR 345-022-0040 Protected Areas and ODEQ standards 340-035-0000-0100, this area should have been monitored and modeled as a Noise Sensitive Property and was not.
3. Does not comply with Scenic Values from the Blue Mountains Parkway and Oregon Trail Interpretive Center. The OR 86 encourages drivers to STOP and read interpretive signs, so viewer perception and resource change cause significant decrease of scenic values. IPC says no significant impact.
4. The DPO does not comply with Exhibit L Protected Areas. The BLM ACEC at Flagstaff Hill has not considered undergrounding for the protection of the Oregon Trail. No analysis found the pristine, Class 1 swales of the Oregon Trail within the ACEC located at: Lat 44.813762 Long -117.750194 or 44° 48' 48.26"N 117° 75' 57.97"W. IPC proposes to build a new constructed road over the Oregon Trail in the area identified in the location above.

5. The DPO does not meet the standards required for Exhibit T Recreational Facilities, OAR 345-022-0100, especially at the Flagstaff Hill interpretive center, because of:
 - a. It is a BLM ACEC area managed for public tourism
 - b. It is the single most visited tourist facility in Baker County
 - c. The quality of the facility is outstanding
 - d. There is no other place where the Oregon Trail can be seen and interpreted.
6. The cost estimates of IPC do not compare with those of the *Edison Electric Institute*, January 2013 publication "Out of Sight, Out of Mind, An Updated Study of the Undergrounding of Power Lines." This article suggests that for 2.5 miles of rural undergrounding, the cost will be \$67,500,000. This is almost half the IPC estimate.

The Oregon Trail along the route of the B2H has the most damaging effects to its critical historic elements. Once the Trail is gone it cannot be reconstructed or mitigated back to life. Once gone, always gone. The only easily accessible public facility in Oregon is the Flagstaff Hill Interpretive Center near Baker City. The B2H must be buried to preserve this important site.

Considering the reasons above and the unconscionable desecration of our national treasure, the Council Must Deny the site certificate for the Boardman to Hemingway Transmission project.

Thank you,



Signature

Printed Name: *Janine Attila*

Mailing Address: *603 Hillcrest Dr.
La Grande, OR 97850*

Email:

August 18, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

EFSC B2H Exhibit K Goal 4, Land Use Decisions regarding forest lands are incorrect.

The applicant and the department failed to follow the state statutes or ODOE rules in the identification of and analysis of Goal 4 forest lands and the impacts the B2H Transmission line will have on this critical local resource as required by OAR 345-022-0030.

There is no statute or rule that allows forest land impacts to be based upon information taken from the Union County Zoning, Partition, and Subdivision Ordinance (UCZPSO).

The action conflicts with ORS 469.504, Facility compliance with statewide planning goals. ORS 469.504(5) addresses the actions that the Oregon Department of Energy is to use if no applicable substantive criteria is provided regarding the counties state plan. It states, "If the advisory group does not recommend applicable substantive criteria within the time established in the department's request, the council may either determine and apply the applicable substantive criteria under subsection (l)(b) of this section or determine compliance with the statewide planning goals under subsection (l)(b)(B) or (C) of this section."

There is no basis for applying the evaluation to a County's Administrative Rules as a substitute for applying State Land Use Rules. No site certificate can be issued prior to having the applicant correct the inaccurate information and providing the public and reviewing agencies opportunity to consider the changed impacts on wildlife, economic, social and environmental determinations which will result. The Oregon Department of Energy and Energy Facility Siting Council are required to determine eligibility for a site certificate based upon correct and current information. The developer has not provided that and a site certificate cannot be issued absent the required information and analysis.

Corrections in the application must include a determination that the development will comply with the state statutes and rules. Union County procedures cannot be used to replace the required evaluation of compliance with statewide land use laws as stated in OAR 345-022-0030.

The Union County Land Use rules fail to reflect the legislative changes made in 2008 and 2011 relating to the determination of what land is considered "forest land".

The distinction is important due to the fact that forest land is treated differently than agricultural land in the siting process. The application must rely directly on the Oregon Statute which has been incorporated in OAR 660-006-0010. The criteria to be used identified in the statute and rules are: USDA Natural Resources Conservation Service soil survey information, USDA Forest Service plant association guides, Oregon Department of Revenue site class maps, or other information determined by the State Forester to be of comparable quality. Predominant use was replaced by the decision criteria above and no longer is an appropriate method of making a determination regarding what is "forest"

land. The applicant has grossly understated the impacts to Union County forest lands and resulting impacts to the economic, social, wildlife and resources of the county.

A site certificate cannot be issued absent information regarding the actual impacts that will occur to this critical local resource.

Sincerely, *Janine Attila*
Janine Attila

Address: *603 Hillcrest Dr.*
La Grande, OR 97850

August 17, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's stated timber values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include the value of any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant claims that the value of the land in the right of way will not be significantly reduced due to the owner's opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The

right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive.

It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for ¼ mile (1,320 ft.) of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing ¼ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence. In other words, the cost of fencing an acre of lost forest land would exceed the value the applicant claims the land would add to the local economy per acre for the 50 years the transmission line is predicted to be in place.

The applicant also claims that the transmission line right of way through forest lands will not cause a substantial change in accepted forest practices or cause a significant increase in the cost of accepted forest practices on lands to be directly impacted by the Project or on surrounding lands. Removing trees from land currently being used to grow them certainly will create a substantial change in accepted forest practices. It also will substantially increase the costs of growing and harvesting trees on the surrounding lands. Soil compacted by heavy equipment used to access the line will discourage regrowth.

The transmission line will make it impossible to use aerial equipment to harvest trees on steep hillsides adjacent to the line; it will increase costs of harvest due to the need to avoid equipment contact with the transmission lines, avoid trees falling on the transmission lines, require new access and egress from the forested lands that avoid having log trucks and equipment moving below the transmission line. It will decrease the harvest along the transmission line due to tree loss along the corridor from wind and weather conditions impacting weakened root infrastructure once the transmission corridor is cleared.

Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming from that activity, but there will be related losses to the productivity of adjacent land, increased costs of harvesting along the transmission line, introduction of noxious weeds, increased risk of wildfire, potential increase in the number of trespassers, interference with wildlife activities including displacement of wildlife to what may be less desirable habitat, opening the area up to increased predation on the multiple non-raptor species utilizing the forested areas, decreased value of land if it is sold, long-term reduction in assessed value of the land, etc. The conclusions stated by the applicant in section 8.0 are false, absolutely without merit.

In addition, the applicant has failed to provide documentation to support their conclusions.

The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Therefore, the Council should DENY the application for site certificate.

Signature

Janine Attila

Printed Name

Janine Attila

Mailing Address:

*603 Hillcrest Dr.
La Grande, OR 97850*

August 12, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project
9/28/2018; Draft Proposed Order 5/23/2019

To: Chairmen Beyeler and Members of the Council

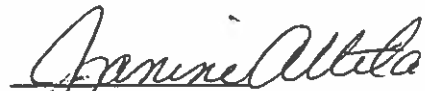
I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project. I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous times in Exhibit S and the **Historic Properties Management Plan and Programmatic Agreement**. OCTA does NOT believe that Exhibit S Historic Properties Management Plan is complete in 7.2.3 Field Crew, and offers this additional condition.

ADDITIONAL CONDITION #1 OCTA recommends that the Council add an Oregon Trail expert to the Cultural Resource Team. This Oregon Trail individual will have qualifications similar to Field crew members. For example, they will have an undergraduate degree in anthropology, archaeology, or in a field such as geology, engineering or history. It will not be necessary to have attended a field school. This individual will be recommended by the National OCTA President and agreed to by the Field Director.

The field surveys, even with SHPO and NPS data, have missed and/or mislabeled some sections of the emigrant trail. OCTA wants the public to know where the Trails are and I do too! OCTA over the years has marked the trail location with wooden signs, small triangles attached to trees, and more recently, carbonite posts and steel rails. Most private property owners are proud of the trail on their property, and after obtaining permission allow the public to walk and hike on the trail.

Idaho Power and their consultants have not acknowledged trail crossings shown on submitted Maps and do not acknowledge visual intrusion of the line for 10 miles per standards, and only upon ODOE's RAI's, put into documents some trail protections. This has been consistent from the BLM process to current day.

Considering the points above, Idaho Power does not comply with the state standards for cultural resources OAR 354-022-0090, or 345-022-0080, Scenic resources. **EFSC Must Deny the Site Certificate!**



Signature

Printed name: Janine Attila

Mailing address: 603 Hillcrest Dr.
La Grande, OR 97850

Email address:

phone number: (optional)

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 17, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.

Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,

Janine Attila
Janine Attila

Name:

Address: *603 Hillcrest Dr.*
La Grande, OR 97850

August 18, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project
9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

I am very concerned about the Boardman to Hemingway Transmission Project as it is proposed. My concerns are for the safety of myself and all of the citizens of La Grande if this line is permitted. My primary concerns are slope instability and wildfire hazard.

The proposed route sited to the west of La Grande is placed on a ridge noted to have instability and high risk for slides. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in not heeding the geologists' warnings. The area down slope from the proposed B2H line lies the Grande Ronde Hospital and Clinics, which employs hundreds of people and is the critical access hospital for this region. La Grande High School and Central Elementary School are also positioned down slope from the proposed towers. At least 100 homes are positioned down slope of the proposed towers. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker, and Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to

wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/fip/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

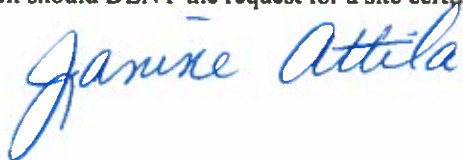
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (2015), Nuns Fire in Sonoma County (2017), which were all attributed to transmission.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city limits, including medium density housing within the city as well as Grande Ronde Hospital. If a line from this proposed route were to spark a fire, La Grande residents would have little time to react. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in grasslands. A fast-moving fire starting at the B2H lines could move to residential areas of La Grande and HOSPITAL in 10 minutes. This is frightening and an unacceptable risk for our citizens.

The current proposal for a Boardman to Hemingway transmission line does not adequately address the issue of landslides, basically by stating it will be mitigated somehow when the time comes to build. The proposal offers no analysis of wildfire risk, which is an unacceptable omission. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of La Grande.

The Council should DENY the request for a site certificate.

Sincerely,



Name:

Janine Attila

Address:

603 Hillcrest Dr.
La Grande, OR. 97850



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) SUSAN BADGET-JAMES

Mailing Address (mandatory) PDB 1391

Phone Number (optional) (541) 263-1103 Email Address (optional) _____

Today's Date: June 20 2019

Do you wish to make oral public testimony at this Hearing: Yes X No _____

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

TO COME LATER

<p style="text-align: right;">Page 54</p> <p>1 B2H line near milepost 106 through 108 of the 2 IPC-preferred Mill Creek route, and that is where the 3 line would come closest to La Grande. Although the 4 application does not specify where blasting will occur, 5 the applicant's blasting plans state, quote: "Blasting 6 may be needed in certain areas with rocky terrain to 7 excavate tower footings, prepare station pads, and to 8 construct access roads." 9 The relevant Structural Standard states, in 10 part: The applicant, through appropriate site-specific 11 study, has adequately characterized the potential 12 geological and soils hazards of the site and its 13 vicinity that could be aggravated by the construction of 14 the proposed facility. 15 My impression from reviewing the application 16 is that the applicant has not fully considered the 17 impacts of blasting on the nearby unstable slope in a 18 populated area of La Grande, Oregon. There is map in 19 the application that shows the B2H line at milepost 106 20 through 108. That map depicts where the line is about 21 2,500 feet from a populated "Unconsolidated Sediments" 22 zone, and then crosses a, quote, "Landslide Deposits" 23 zone near milepost 108. 24 The application also mentions in text, slope 25 instability in a small part. Quote: "One of the</p>	<p style="text-align: right;">Page 56</p> <p>1 HEARING OFFICER WEBSTER: Thank you. 2 MS. SUSAN BADGER-JONES: Thank you. Susan 3 Badger-Jones, 412 H Avenue, PO Box 1341, La Grande. 4 While I agree with most of the objections 5 you'll hear this evening about elements of the 6 application for site certification, I want to 7 specifically address portions of the Morgan Lake 8 Alternative, Exhibit T, page 44. 9 La Grande has been my home for more than 10 30 years, and in that time, visiting Morgan Lake Park 11 has been a weekly, but more likely daily pleasure, 12 enjoying the wildflowers as they emerge, walk or bird, 13 exercise my dog, meet friends, gather at a picnic table. 14 Which brings me to the tower at the park. The 15 City of La Grande has many well-manicured parks with 16 playing structures, sports fields, hard scape, 17 buildings, and professional landscaping. Morgan Lake, 18 however, has been reserved to experience the natural 19 world; birds, waterfowl, fishing, camping under the 20 stars. It's one of the few places around here you can 21 go to see the sunset. Nesting osprey, cormorants, and 22 other waterfowl. It's a quiet place; no motors are 23 allowed on the lake. 24 Due to the popularity of the park, over the 25 last few years the City has made improvements to</p>
<p style="text-align: right;">Page 55</p> <p>1 landslides intersects the IPC proposed routed between 2 towers 160/3 and 106/4. Based on review of the 3 topography and aerial photographs, this mapped landslide 4 may impact the proposed work areas around tower 160/4. 5 A field reconnaissance of this area should be performed 6 as part of the geotechnical exploration program," 7 unquote. 8 My concern is more about the construction 9 process than about the integrity of the towers after 10 construction. The application identifies the problem in 11 general but provides no detail about the blasting or the 12 potential effects on nearby houses in an area that the 13 City of La Grande designates as a, quote, "Geologic 14 Hazard Zone," unquote. We know that each tower footing 15 will require a hole 30 to 50 feet deep, and that the 16 bedrock underneath the line on milepost 106 to 108 will 17 almost certainly require blasting for efficient 18 excavation. 19 The application does not address this concern, 20 and the proposed construction is simply too close to a 21 populated area to mitigate the risk of damage to homes. 22 The application does not comply with the relevant 23 standard. 24 I will include detailed references in my 25 written comments. Thank you for your consideration.</p>	<p style="text-align: right;">Page 57</p> <p>1 hosting, maintenance, and campground designation, 2 supporting that natural experience. A tower is very 3 much at odds with this. 4 The application says vegetation will block 5 views of the proposed tower. It's just not true. Trees 6 at the proposed site are 70, maybe 80 feet tall, but the 7 tower 130 feet and basically ugly. The tower will be 8 highly visible coming and going and from many locations 9 in the park. 10 While people may still be able to walk and 11 boat and camp, the quality of that natural experience 12 will be very much compromised. "Less than significant 13 impact" is what the application says. Give me a break. 14 That brings me to fire. Fire is a constant 15 danger in a park area, and the proposed tower heightens 16 that threat. The area is already well familiar with 17 wildfire and subsequent loss of timber and homes, yet 18 that risk isn't even addressed. 19 And then there is the road. The only access 20 to the staging area and future maintenance is the 21 county's Morgan Lake Road. It's the only access to town 22 and emergency services for more than 30 families. You 23 do the math; 30 homes, 2 drivers each, 2, 4 trips a day, 24 6 to 7 days a week to work, to school, church, kids, 25 medical services, and then there are people coming up</p>

<p style="text-align: right;">Page 58</p> <p>1 the road to visit, and even more park goers. That road 2 is steep, it's a 17-degree slope. They don't even let 3 you build those anymore. Besides it being steep, it's 4 narrow, windy, and in bad shape. Except for a few days 5 after its annual grading, which they just did, in case 6 you want to drive up there, I imagine, the road is 7 bumpy, rutted and loose with gravel.</p> <p>8 Earlier this year a car-sized section of the 9 road slumped more than a foot, causing one-way traffic 10 for more than 3 weeks. Last year a long section of 11 guardrail simply fell off the side of the road and 12 remained off for months.</p> <p>13 The prolonged pounding of large tires on heavy 14 construction vehicles going up and down the road, that 15 application says it will cause only temporary and less 16 than significant impact. That is just not true. There 17 will be significant impact to the daily users and 18 significant and probably long-term impact to the 19 condition of the road.</p> <p>20 And finally there is the future. The 21 likelihood for this area to become a utility corridor. 22 Imagine a guy showing up on your front doorstep and just 23 moving in, uninvited, unwanted, parking in your 24 driveway, throwing stuff around your house, making noise 25 and dust, wrecking your view for months, and you get no</p>	<p style="text-align: right;">Page 60</p> <p>1 scenic vistas of the mountains surrounding our valley. 2 Many out-of-town visitors are drawn to Union County 3 because of this scenic beauty. Placement of these 4 towers will certainly have an impact on this part of our 5 tourism.</p> <p>6 I often take early morning walks and am in awe 7 of the beauty that surrounds us, especially in my views 8 to the southern end of the valley where I reside. I 9 have always considered myself fortunate to live in such 10 a spectacular area. I am extremely concerned as to the 11 blight these towers will place upon our viewshed.</p> <p>12 Currently, I look out and see a ridge line 13 topped with green trees that presents a spectacular 14 view. This will forever be changed and irrevocably 15 harmed by the placement of these towers. Please 16 consider the aesthetic needs and economic interests of 17 our beautiful valley and take the responsible action 18 against the siting of these towers in our valley.</p> <p>19 Thank you for your time.</p> <p>20 HEARING OFFICER WEBSTER: Thank you. 21 Following Mr. Kelly, we will hear from Anita 22 Metlen.</p> <p>23 MR. BRIAN KELLY: Good evening. I'm Brian 24 Kelly, B-r-i-a-n, K-e-l-l-y. My address is PO Box 2768 25 in La Grande, Oregon 97850.</p>
<p style="text-align: right;">Page 59</p> <p>1 benefit. There are no substations that benefit people 2 in Union County or other nearby counties. And when this 3 guy finally moves out, he leaves a big swath through 4 your landscape with a permanent buzz overhead. And he 5 says, Oh, by the way, there will probably be more of us 6 coming. Uninvited, unwanted, offering us no benefit.</p> <p>7 These are significant and permanent impacts. 8 I object, especially knowing that this whole thing could 9 have gone through uninhabited BLM land.</p> <p>10 Thank you. I will submit details.</p> <p>11 HEARING OFFICER WEBSTER: Following Mr. Dill, 12 we will hear from Brian Kelly.</p> <p>13 MR. DWIGHT DILL: Dwight Dill, I live at 7077 14 Aquarius Way in La Grande.</p> <p>15 You spoke a lot this evening about raising our 16 issues with sufficient specificity. I will be 17 submitting written comments at a later date. I will be 18 sufficiently specific. I think my comments tonight are 19 probably more emotional.</p> <p>20 I'd like speak to my concern regarding the 21 environmental and visual impact of the B2H towers since 22 they were proposed to be sited on the southern edge of 23 La Grande near Morgan Lake. I have heard many 24 individuals refer to Union County as a "hidden gem" in 25 Oregon. We have an incredibly beautiful valley with</p>	<p style="text-align: right;">Page 61</p> <p>1 I am the restoration director with the Greater 2 Hells Canyon Council. We are a conservation 3 organization based right here in La Grande. We have 4 been in existence for 52 years located in northeast 5 Oregon.</p> <p>6 One reason I mentioned that we have been 7 around for 52 years is we started to prevent dam 8 building in Hells Canyon. The reason I bring that up 9 tonight is because when I read through the justification 10 for this power line, it's eerily reminiscent of the 11 justification to build the dams in Hells Canyon. As you 12 may know, we have three existing dams in Hells Canyon, 13 but there was a proposal in the late '60s to construct 14 more dams that would block up the Salmon River coming 15 out of central Idaho and the Imnaha River coming out of 16 the heart of the Wallowa Mountains.</p> <p>17 When they constructed the original dams, one 18 day in 1958, 4,000 salmon came to the construction site 19 and promptly died. In my book, that constitutes crime 20 against nature. And we, when I say "we," the people who 21 came before me, successfully prevented those dams from 22 being built and prevented a crime against nature.</p> <p>23 We have learned a lot. We have developed a 24 lot of technology in the last 52 years, and we can do 25 better than constructing this power line. When I was</p>

SPY

SEE
EXHIBIT C

208 1341

My name is Susan Badger-Jones, 412 H Ave La Grande.

While I agree with most of the objections you'll hear this evening about elements of the application for site certification, I want to specifically address portions of the Morgan Lake Alternative, Exhibit T, page 44

La Grande has been my home for more than 30 years, and in ~~the~~ that time, visiting Morgan Lake Park has been a weekly—but more likely daily pleasure—to enjoy wildflowers, walk or bird...exercise my dog meet friends, ~~to picnic or kayak on the lake. Even more frequently travel the gravel Morgan Lake Road to visit friends.~~

lets begin w

~~The Tower at the Park~~The city of La Grande has many well manicured parks with playing structures, sports fields, hard scape, buildings and professional landscaping. Morgan Lake Park how ever has been reserved to experience the natural world. Birds, water fowl, fishing, camping under the stars. It's the only place around you can see a sunset, ^{there are} nesting osprey, cormorant ~~as~~ and other water birds. "It's a quiet place.....no motors allowed. Due to popularity of the park, over the last few years the city has made improvements to hosting, maintenance and campground designation.....supporting that natural experience. A TOWER IS ^{VERY MUCH} ~~AT~~ ODDS WITH THIS

The application says vegetation will block views of the proposed tower. That's not true. Trees at proposed site are ⁷⁰⁻⁸⁰ feet tall ~~and~~ ^{but} the tower 130 feet...if not 150. The tower will be highly visible... coming and going ^{in many} AND from many locations in the Park. While people may still be able to walk, and camp and boat—the quality of that "natural" experience WILL be compromised. "less than significant impact" Give me a break.

2) - Fire is a constant danger in the Park area.....and ^{the application} ~~you~~ now propose heightening the threat. The area is well familiar with wildfire and subsequent loss of timber and homes—yet that risk is not even mentioned.

~~What is being said is from
Boatman services.~~

3 - Then there's the road.....

The only access to the "staging site" and future maintance is the county's Morgan lake Road. It's also the only access to town and emergency services for more than 30 families. You do the math.... 30

homes.. average 2 people....2-4 trips a day....6-7 days a week to work, school, church, kids events, medical services.....add in the *even more* Park goers. And that road is steep....17 degrees — they don't let you build 17 *degree* roads any more—besides being steep, it's narrow, winding and in bad shape. *Except for a few days after it's annual grading is bumpy, rutted and loose with gravel. Earlier this year a car-sized section slumped more than a foot, causing one way traffic for more than three weeks. Last year a long section of guard rail just "fell off" the side of the road and remained off for months.*

the prolonged pounding of large tires heavy construction vehicles going up and down the road? The application says it will cause ONLY "temporary" and "less than significant" impact? Not true. ***There will be SIGNIFIANT impact to daily users AND significant —and probably long term—impact to the condition of the road.***

family And then there's the future... ***The likelihood for this area to become a utility corridor.***

Imagine a guy Showing up *from* your doorstep and just moving in.....un invited.... un wanted. Parking in your drive way, throwing stuff around your house... making noise and dust.. wrecking your view—for months. You get NO benefit (no power access). And when he finally moves out, he leaves a big swath plowed though your landscaping *with* a permanent buzz overhead....and he says....."oh, by the way, there'll be more of us coming" Un-invited, unwanted, offering us no benefit.

These things ARE SIGNIFICANT and PERMENANT IMPACTS. I OBJECT....especially knowing that this whole thing could have gone through un-inhabited BLM land.

Thank you, I will submit detailed *written* comment. *letter*



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Dustin Baker

Mailing Address (mandatory) 2340 Rock Springs Canyon Rd.
Mysser, OR 97913

Phone Number (optional) 541 246-9015 Email Address (optional) _____

Today's Date: 06/18/2019

Do you wish to make oral public testimony at this Hearing: Yes ☒ No ☐

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

<p style="text-align: right;">Page 58</p> <p>1 more stuff, because like I said, I was very ill-prepared 2 for this meeting. 3 HEARING OFFICER WEBSTER: Thank you. 4 Ms. Marlette. 5 MR. JOANN MARLETTE: I'm JoAnn Marlette. I 6 reside at 2031 Court Street, Baker City, Oregon. And 7 I'm here to speak to you about the surveys for wildlife 8 habitat. 9 The survey area for wildlife habitat is not 10 adequate and the information is not current. 11 The survey area for wildlife habitat impacts 12 is identified as the siting corridors where the 13 transmission line and other developments will be 14 constructed. The surveys that were completed were done 15 during 2011 through 2014. The material provided is not 16 current per ODFW page P1-17 of the application, stating 17 the surveys are good for 3 years and the sample size was 18 too small on which to base any decisions. Wildlife 19 Condition 2 requires preconstruction surveys regardless 20 of any prior surveys. The small amount of available 21 habitat surveyed and the outdated nature of the surveys 22 do not allow a determination that this development 23 complies with OAR 345-022-0060. 24 This transmission line will span over 300 25 miles. Given the lack of information currently</p>	<p style="text-align: right;">Page 60</p> <p>1 Baker. Mr. -- is it Baker? 2 MR. DUSTIN BAKER: Baker, yes. 3 HEARING OFFICER WEBSTER: Mr. Baker, if you 4 could please state your name and your address for the 5 record. 6 MR. DUSTIN BAKER: My name is Dustin Baker. I 7 live at 2340 Rock Springs Canyon Road, about a mile and 8 a half north and a little bit west of Jim Foss who 9 testified earlier. I'm also a manager of Faith Land 10 Company, and we own property on the Malheur River west 11 of the irrigated land. And Idaho Power will cross that 12 location. At this time their proposed route is across 13 that location. 14 Regarding the Faith Land Company property, 15 Idaho Power has been very good about contacting us, come 16 out and visited our location, helped site the towers, 17 where they're going to be, consulted with us on the best 18 routes for their access roads, and were very thorough in 19 that process. So I want to commend them on that. 20 However, in regards to the property that we 21 own on Rock Springs Canyon Road, the property 22 transmission line does not technically cross our 23 property; the easement goes across the corner of our 24 property. And so the power lines are sited just off of 25 our property line. Idaho Power has not contacted us in</p>
<p style="text-align: right;">Page 59</p> <p>1 available, and the limited area planned for future 2 wildlife surveys, it is not possible to determine 3 whether or not the transmission line will be in 4 compliance with the above rules. The lack of 5 information extending beyond the site borders makes it 6 impossible for the developer to know if they are working 7 too close to an active raptor nest or whether they 8 comply with setback requirements. 9 Without a current, up-to-date survey, there 10 will be no baseline for impact assessment in order to 11 determine how significant the impacts may be and 12 determine if they preclude issuance of a site 13 certificate. 14 I will be providing written comment prior to 15 the July 23rd deadline. 16 Thank you. 17 HEARING OFFICER WEBSTER: Thank you. 18 Is there anybody else here that would like to 19 give comment this evening? Is there anybody on the 20 phone, do we know, that joined us? 21 IT PERSON: No. 22 HEARING OFFICER WEBSTER: Okay. 23 MR. DUSTIN BAKER: I have the form here. I'll 24 give it to you. I'll submit some written, too. 25 HEARING OFFICER WEBSTER: This is Dustin</p>	<p style="text-align: right;">Page 61</p> <p>1 regards to that property in any way, had no 2 representatives from Idaho Power come and look at that 3 proposed siting. 4 So my concern is similar to Foss's, is that 5 the current proposed route will create additional roads, 6 additional access, additional traffic, that we as 7 private landowners will need to contend with and deal 8 with. In my opinion, if they would have consulted with 9 local landowners who know the area more thoroughly in 10 this location, we could have helped them locate the 11 power line approximately 1 mile directly to the west and 12 farther to the south that would have avoided any of the 13 exclusive farm use property and been off of private 14 property. 15 I'm not sure their reasoning for wanting to 16 continue to keep the power line as close to private 17 property as they can. I don't know if it's easier for 18 them to deal with private property owners than it is to 19 deal with the BLM, Bureau of Land Management. But in 20 this case, they could have done a much better job 21 consulting with the local landowners in that specific 22 area. 23 That's what I'd like to say. Thank you. 24 HEARING OFFICER WEBSTER: Thank you. 25 Anybody else this evening?</p>

August 19, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/19

Dear Chair Beyeler and Members of the Council:

I am writing as a concerned citizen and private property owner (Member/ Manager Chaps Land Co. LLC) regarding the proposed B2H route where it crosses land zoned for Exclusive Farm Use (EFU) near the Owyhee River in Malheur County, Oregon.

As landowners adjacent to and crossed by the current proposed route we have met with representatives from Idaho Power, including Jeff Maffuccio, Facility Siting Coordinator (July 29, 2019) and the local Vale District BLM, including Renee Straub, the Bureau of Land Management (BLM) Project Manager for the B2H Transmission Project (Aug 14 2019) to express our concerns and try to resolve issues regarding detrimental impacts of the route crossing over EFU lands.

In crossing EFU land Idaho Powers current proposed route in the area of the Owyhee River (Map #125, please find enclosed) violates two Oregon Revised Statutes and leaves the BLM established and approved Utility Corridor (Purple Highlighted area on Map #125), (2002 Resource Management Plan (RMP))

ORS 215.213. (1) In counties that have adopted marginal lands provisions under ORS 197.247 (1991 Edition), the following uses may be established in any area zoned for exclusive farm use:


(c) Utility facilities necessary for public service, including wetland waste treatment systems but not including commercial facilities for the purpose of generating electrical power for public use by sale or transmission towers over 200 feet in height.

The proposed route also fails to meet the necessary requirement of **ORS 215.275** for utility facilities necessary for public service to be sited on EFU land. (a) there is not a technical or engineering feasibility issue to stay within the BLM Utility corridor, (b) crossing private EFU land is a more indirect and longer route and (c) there is available urban and non-resource land within the existing utility corridor.

In our meeting with Renee Straub and the Brent Grasty (Planning Director) of the Vale District BLM office, they stated that Idaho Power can still apply to amend their route application with the BLM to stay within the Utility Corridor. This would require the route cross a small portion at the very northern end of the area specified by the BLM in their 2002 (RMP) as Suitable Wild and Scenic River (WSR). This is the lowest classification of suitable WSR as it has manmade structures, including a paved road along the river and an existing above ground (highly visible) irrigation structure (Owyhee Irrigation District North Canal Siphon Conduit) from high on the S.E. side of the river and crossing under the river to the N.W. side of the River approximately 1/2 mile upstream from our (Landowners) preferred route for the power line to cross the river.

In light of these facts we strongly recommend that the EFSC deny the Site Certificate and require Idaho Power to Amend their Siting Certificate Application to move the route off of the EFU land near the Owyhee river as proposed and shown in Map #125 to stay within the BLM Utility Corridor, in order to comply with Oregon State Law as well as, minimize the economic, aesthetic, and quiet enjoyment, impacts on the private land owners and residents in the affected area.

Sincerely,

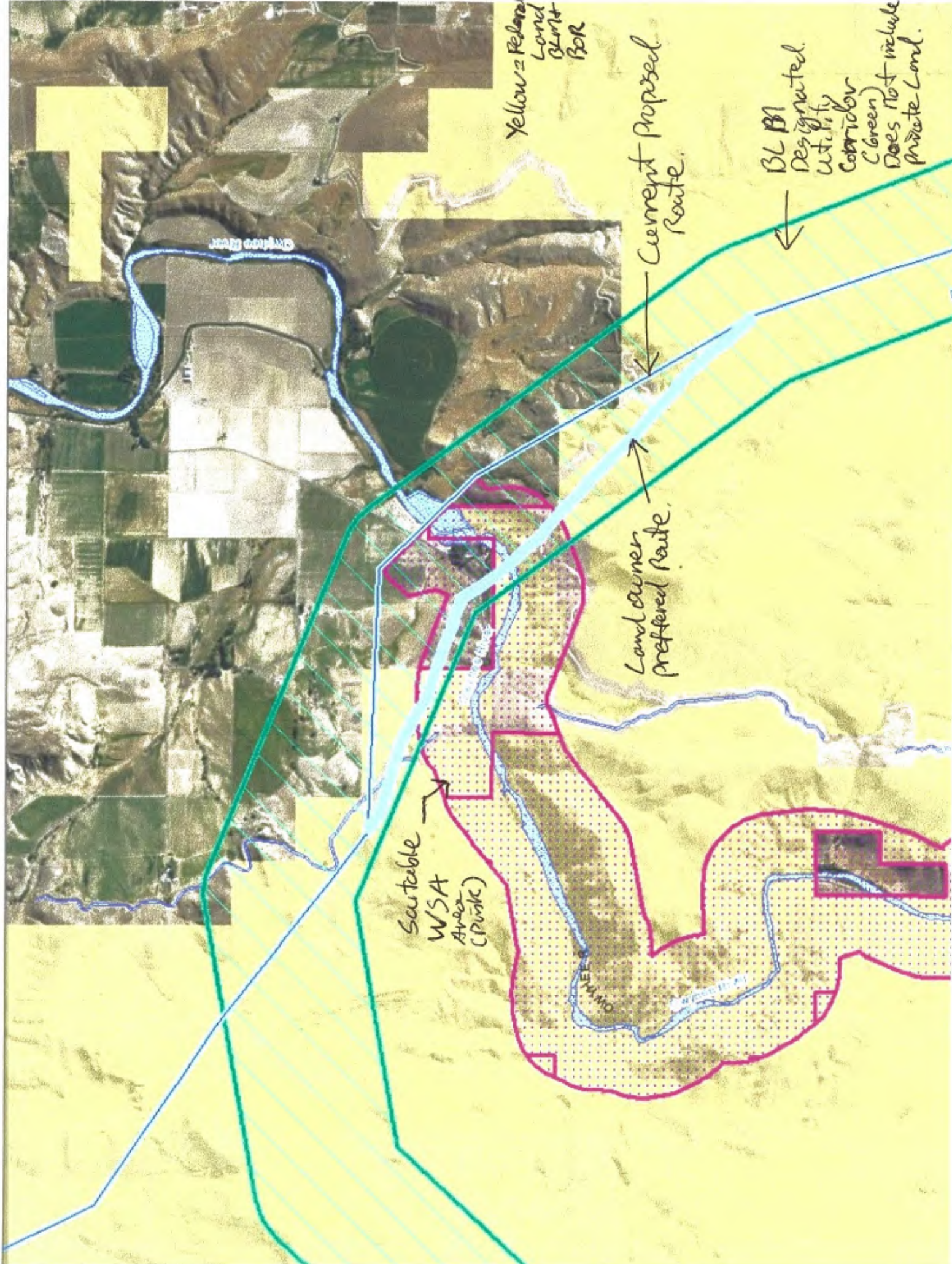
A handwritten signature in black ink, appearing to read "Dustin Baker", with a long, sweeping horizontal line extending to the right.

Dustin Baker,

Chaps Land Co. LLC

2340 Rock Springs Canyon Rd.

Nyssa, OR 97913



Yellow = Refers to
Land
Blt
BOR

Current Proposed
Route.

BLB1
Designated
Utility
Corridor
(Green)
Does Not include
Private Land.

Landowner
preferred Route.

Sawtable
WSA
Area
(Pink)

OWNERS

Meet public needs for use authorizations such as rights-of-way, leases, and permits consistent with other resource objectives. Encourage right-of-way applicants to locate their facilities within designated corridors (Map LAND-1) to minimize impacts to other resource values. Maintain existing communication sites and allow new sites that will be consistent with other resource values. Develop site plans that enhance site quality (see Appendix L and Table L-2). Encourage relinquishment of no longer needed material and borrow sites that were established under title 23 of the Federal Highway Act.

Initiate new withdrawal actions to protect high value resources or government capital investments. Review withdrawals in order to recommend continuations, modifications, revocations, or terminations. Appendix L and Table L-3 lists existing withdrawals. When acquiring land, determine on a case-by-case basis whether or not the land should be withdrawn from entry under the public land laws, mining laws, or mineral leasing laws.

Acquire and maintain legal public access to public land consistent with other resource objectives. Existing easements and access needs are depicted on Map LAND-1.

Roads may have a major impact on a multitude of physical and biological processes, as indicated in the Scientific Assessment for the Draft Eastside EIS (Quigley and Arbelbide 1996). Careful planning of roads is necessary to balance human desires with protection of resource values. A transportation management plan will be developed by the engineering staff to consolidate documents outlining the BLM's philosophy toward transportation management. The plan will not make specific transportation management decisions but will supply general guidance and direction. This document will become the district's final transportation plan upon designation of arterial, collector, local, and land management roads and the completion of transportation management objectives that recommend specific management on individual roads. To ensure that resource objectives are met, standards for construction, maintenance, and access management for the road and trail system will be required. This plan will respond to the district's ROD and approved resource management plan objectives to develop and maintain a transportation plan that meets resource management objectives while serving the needs of users in an environmentally sound manner. Roads will be addressed under specific resource activities.

Eliminate unauthorized use of public land. Adjudicate and process unauthorized use cases and resolve trespass by (a) issuing authorizations, (b) terminating the use and reclaiming the land, and/or (c) disposing of land through exchanges and/or sales, regardless of land tenure zones. Such lands may be disposed of only if the unauthorized use occurred prior to the approval of the SEORMP.

Public lands located in areas of survey error or hiatus may be retained or disposed of as deemed appropriate after considering the resources they contain and their relationship to the surrounding lands.

Clean up and reclaim public land consistent with other resource objectives.

Objective 2: Establish right-of-way corridor routes and consider potential sites for wind or solar energy facilities to the extent possible, taking into account avoidance areas, consistent with resource objectives.

Rationale: Section 503 of FLPMA provides for the designation of right-of-way corridors and encourages use of rights-of-way in-common to minimize environmental impacts and the proliferation of separate rights-of-way. BLM policy, as described in BLM Manual 2801.13B1, is to encourage prospective applicants to locate their proposals within corridors.

Land and Realty

Objective 1: Retain public land with high and public resource values. Consolidate public landholdings and acquire land or interests in land with high and public resource values to ensure effective administration and improve resource management in Zone 1 (see Appendix L for definitions of Zones 1, 2 and 3). Acquired land will be managed for the purposes for which it was acquired. Make available for disposal up to approximately 41,000 acres of public land within Zone 2, primarily by exchange. Make available for disposal approximately 62,100 acres of public land within Zone 3 by State Indemnity Selection, private or State exchange, Recreation and Public Purpose Act (R&PP) lease or sale, public sale, or other authorized method (see Appendix L).

Rationale: Section 102 of FLPMA requires that public land be retained in Federal ownership unless disposal of a particular parcel will serve the national interest. Acquisition of land to consolidate ownership patterns will provide for more efficient land management and administration for both public and private landowners. Retention and acquisition of land containing significant resource values will provide for long-term protection and management of those values. Any acquired land or acquired interest in land will be managed for the purposes for which they are acquired or in the same manner as adjacent or comparable public land.

Section 202 of FLPMA provides for disposal of public land through exchange. While this method will be available for use in Zones 1 and 3, it will be the primary method employed in Zone 2. Zone 2 has been identified as an area of limited retention and land ownership consolidation.

Zone 3 lands have been identified for disposal because they meet the sales disposal criteria found in Section 203 of FLPMA. While public sale may be used to dispose of these lands, all other methods of disposal listed in this document are available for use.

Monitoring: Review public access needs in all land tenure adjustment transactions on a periodic basis; apply resource monitoring procedures utilized on adjacent or comparable land to newly acquired land; follow normal BLM accomplishment and plan implementation tracking processes.

Management actions: Acquire, maintain, and develop legal public and administrative access consistent with other resource values (see Map LAND-1). Consider public access needs in all land tenure adjustments. Make land tenure adjustments consistent with the criteria identified in Appendix L1. Refer to Maps LAND-2J and -2M for a depiction of land tenure zones. Any acquired land or acquired interest in land will be managed for the purposes for which they are acquired or in the same manner as adjacent or comparable public land.

1) Retain or increase public landholdings in Zone 1 as depicted in Maps LAND-2J and LAND-2M with special emphasis on acquiring land with high and public resource values.

2) Implement limited retention and consolidation of land in Zone 2, with special emphasis on acquiring land with high and public resource values.

3) Acquire other interests in land, including conservation and scenic easements, to assure efficient administration and improve resource management. Emphasize acquisition of interests in areas with high and public resource values.

4) Make Zone 3 land available for disposal by any authorized method.

Consolidate split-estate where appropriate to improve resource management while protecting resource values.

Rationale The most critical vegetation resources will be protected during the life of this plan. Most current uses will continue without damage to the resources due to the isolation and natural topography. Aggressive control of weeds will assist in preventing future invasions.

Wild and Scenic Rivers

Objective: Protect and enhance outstandingly remarkable values (ORV's) of designated national wild and scenic rivers (NWSR's), and provide interim protection of ORV's of rivers found suitable for inclusion in the NWSRS until Congress acts.

Rationale: The National Wild and Scenic Rivers Act² (NWSRA) (Public Law 90-542 and amendments), section 1(b), states that "certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations." Section 5(d) requires Federal agencies to consider potential wild, scenic, and recreational river areas in all planning for the use and development of water and related land resources. Section 10(a) describes the basic management requirement of protecting and enhancing the values that caused the river to be included in the NWSR system. In accordance with BLM policy, all eligible rivers were evaluated for suitability. The planning determination of suitability provides the basis for any decision to recommend legislation. Factors to be considered (see section 4[a] of the NWSRA) in the suitability determination include: the current status of landownership and use in the area; the reasonably foreseeable potential uses of the land and water which will be enhanced, foreclosed, or curtailed if the area were included in the NWSR system, and the values which will

Table 14., Eligible and administratively suitable national wild and scenic study rivers (PSEORMP Table 3-13)

Resource area	River	Miles	Acres ¹	Tentative classification
Malheur,	Dry Creek (M15)	16.8	5,344	Wild
	Owyhee River Below the Dam (M16)	13.5 ²	3,973	Recreational
	North Fork Malheur River (M17)	3.6	996	Wild
Jordan,	Antelope Creek (J19)	8.6	1,448	Wild

¹ Acres based on 0.5-mile-wide corridor (0.25-mile each side), except on Antelope (J19) which is rim to rim.

² Under cooperative study, includes 4.3 river miles of BOR.

³ These rivers have met the suitability criteria and have been determined to be administratively suitable for inclusion in NWSRS

and important values. Increasing human use in the area has created new threats that need to be resolved by active management.

Toppin Creek Butte ACEC/RNA

Description and valuesThe 3,996-acre Toppin Butte ACEC/RNA is located 30 miles north• east of McDermitt, Nevada, and adjacent to the Idaho stateline. The topography includes a gently sloping hill with a rapidly draining soil. Little water has been available for livestock on the Butte, and the topography still limits livestock use on the upper slopes. Two playas at the base of Toppin Butte contain a bare playa community and a silver sagebrush community that have lesser research potential.

The relevant and important values of this ACEC/RNA are the low sagebrush/bluebunch wheatgrass community in excellent condition and low sagebrush/Idaho fescue plant commu• nity vegetation cells identified by the ONHP. These plant communities will be specially managed for current and future research. Also identified as relevant and important values are sage grouse and associated habitat for neotropical bird migration.

Portions of two WSA•s are located within and comprise 100 percent of the ACEC/RNA. Approximately 152,040 acres of the Owyhee River Canyon WSA (3-195) has been recom• mended by BLM as suitable for wilderness designation. BLM has recommended Lookout Butte WSA (3-194) as not suitable for wilderness designation. WSA•s are currently managed in accordance with BLM•s IMPLWR. Under this direction, surface-disturbing activities requiring reclamation are generally precluded from the WSA•s until Congress makes a decision on wilderness designation.

The ACEC/RNA includes a portion of one grazing allotment. Due to the presence of road 6350-0-AO and a water development, the playas have been disturbed and have less value for research, but could be used as comparison study plots for less disturbed playas.

The ACEC/RNA has moderate potential for the occurrence of geothermal resources and a low potential for all other leasable and locatable minerals. There is no record with BLM of mining claims within the boundaries of the ACEC/RNA and no demonstrated interest in energy and mineral resources, indicating a low potential for development.

Specific managementRights-of-way will be granted only if there is minimal conflict with identified resource values and impacts could be mitigated. OHV use will be limited to designated roads and trails. The area will be VRM Class II, and plant collecting will require a permit. Road maintenance will be limited to the existing roadway, and shoulder/barrow ditch construction will be limited to that necessary to control runoff, minimize soil erosion, and ensure public safety and serviceability of the road. The ACEC/RNA will be open to locatable and leasable minerals activities and closed to saleable minerals. Surface-disturbance will be deferred while soils are wet, and any future rehabilitation will be with local source native plant species. Livestock use will continue based on existing permit stipulations and approved AMP•s. Any proposed changes in grazing, including time and intensity of use, will be evaluated for impacts on the relevant and important values and will be permitted if the values will be maintained or enhanced. Existing livestock use will be adjusted where adverse impacts are identified using a variety of methods, including but not limited to fencing, reduction in livestock numbers, and changes in grazing season. Proposed projects in the area will be evaluated for impacts and permitted where relevant and important values will be maintained or enhanced. Noxious weeds will be aggressively controlled using limited methods, such as backpack hand sprayers, focusing on roads and other disturbed areas in and adjacent to the ACEC/RNA.

be foreclosed or diminished if the river is not protected as part of the NWSR system; other agencies, organizations or publics interested in designation or nondesignation; administrative costs; ability of the agency to manage and/or protect the river area; historic or existing rights. Refer to Table 14 for suitability.

Legal considerations specific to existing designated national wild and scenic rivers. The 1993 Main, West Little, and North Fork Owyhee National Wild and Scenic Rivers Management Plan is currently under litigation regarding grazing management. An Order of Modified Injunction was filed in the District Court of Oregon on April 28, 2000. The order directed that certain fences and water developments (wells, pipelines and troughs) may be constructed by the grazing permittees to facilitate the elimination of grazing at areas of concern identified in the 1993 Main, West Little, and North Fork Owyhee National Wild and Scenic Rivers Management Plan. The District Court of Oregon retains jurisdiction over the case until a court ordered EIS is completed. The new EIS, which will require much data collection to support impact predictions, is projected to be complete in the year 2006. Management of the remainder of the designated Owyhee NWSRs, including grazing management in areas other than the areas of concern listed in the river plan EA, will continue under the direction of the plan of 1993, until amended.

Monitoring: Monitor use and ORVs within designated and administratively suitable rivers to ensure protection and enhancement of ORVs consistent with the NWSRA. Also see Appendix W.

Management actions:

Congressionally Designated Rivers

The basic river management plan goals for the Main, West Little, and North Fork Owyhee NWSRs are to (1) protect and enhance the outstandingly remarkable recreational, scenic, geologic, wildlife, and cultural values of the designated Main Owyhee River; (2) protect and enhance the outstandingly remarkable recreational, scenic, and wildlife values of the designated West Little Owyhee River; (3) protect and enhance the outstandingly remarkable recreational, scenic, and wildlife values of the designated North Fork Owyhee River; (4) ensure protection and enhancement of the values which caused these rivers to be designated without limiting other uses that are consistent with those goals and do not substantially interfere with public use and enjoyment of these values; (5) provide visitor services to enhance the enjoyment of the Owyhee River System while protecting the unique and sensitive resource values of the area; and (6) enhance visitor and land user appreciation of the important resources of these rivers.

Manage the Main, West Little, and North Fork Owyhee NWSRs in accordance with the approved 1993 river management plan, while remaining in compliance with (1) the judge's opinion and order which affects livestock grazing in the plan's areas of concern and (2) resolution of litigation. For the Main Owyhee NWSR, the Deary Pasture area of the Jackies Butte Allotment will be closed to livestock grazing. Livestock trailing will continue where feasible and in compliance with the District Court of Oregon's direction. The acquired properties known as the Birch Creek Historic Ranch will be closed to application for term grazing permits except for temporary grazing authorizations. These will be issued at the discretion of the BLM for management purposes (including, but not limited to, vegetation manipulation or field management), administrative purposes, and interpretive needs. Designated buildings at the Birch Creek Historic Ranch will be available to the public for overnight use and other compatible uses consistent with public safety requirements. Opportunities for

closely supervised concessionaire agreements may be pursued, consistent with protection of ORV's and historic values.

Uses within congressionally designated NWSR's will be restricted or excluded where such uses are determined to degrade ORV's or impair opportunities for enhancement of ORV's.

Administratively Suitable Rivers

Provide interim protection of the ORV's of administratively suitable rivers while awaiting a determination by Congress. Refer to BLM Manual 8351 for NWSR IMP guidelines.

Approximately 42.5 miles of eligible rivers and streams (Map WSR-1) are determined to be administratively suitable for designation by Congress as NWSR's (as depicted in Table 14). This will include three river segments in MRA: Dry Creek (16.8 miles with a tentative wild classification), Owyhee River Below the Dam (13.5 miles with a tentative recreational classification), and North Fork Malheur River (3.6 miles with a tentative wild classification); and Antelope Creek (8.6 miles with a tentative wild classification) in JRA. These river/stream segments and their associated interim corridors of public lands (as noted in Table 14) will be provided interim protection of their ORV's while awaiting a designation determination by Congress. Refer to BLM Manual 8351 for NWSR interim management guidelines. Uses within these administratively suitable rivers will be restricted or excluded where such uses are determined to degrade ORV's.

Land Adjacent to Wilderness Study Areas

Objective: BLM-administered land identified in the 1991 Wilderness Study Report, Oregon (WSRO) and determined to have wilderness values will be included in adjacent wilderness study areas (WSA's) and managed under the Interim Management Policy for Land under Wilderness Review (IMPLWR).

Rationale: Under FLPMA, wilderness preservation is part of BLM's multiple-use mandate, and wilderness is recognized as part of the spectrum of resource values considered in the land use planning process. Under the wilderness review program, the existing designated WSA's are managed in accordance with BLM's IMPLWR. The general standard for interim management is that land under wilderness review must be managed so as not to impair suitability for preservation as wilderness. Wilderness characteristics and values, described in section 2(c) of the Wilderness Act of 1964 (Public Law 88-577), must be protected and enhanced in all WSA's. The initial task of identifying areas suitable for wilderness preservation has been completed as mandated in FLPMA section 603, and is documented in OWFEIS and WSRO. In addition, and as identified in the WSRO, there are parcels of public land outside but immediately adjacent to WSA's that have been recommended as suitable for wilderness designation. These areas will be included in the appropriate WSA and managed as WSA's under authority of FLPMA sections 202 and 302. The IMPLWR will apply to these areas while under wilderness consideration by Congress.

Monitoring: Monitoring and surveillance of the parcels of land added to existing WSA's will be done to ensure compliance with IMPLWR.

Management Actions: Certain tracts of land that were identified in the WSRO as non-Federal land identified for possible acquisition (that have since been acquired) or as adjacent Federal land recommended for wilderness will be added to existing WSA's and managed under IMPLWR guidance. This addition will be about 3,280 acres of affected adjacent BLM land and 860 acres of acquired non-Federal land which, combined, affect a total of five WSA's (see Table 15). See Map WSA-1 for the location of existing WSA's in the planning area.

TARDAEWETHER Kellen * ODOE

From: joel baker <joeld.baker@outlook.com>
Sent: Friday, August 16, 2019 3:50 PM
To: B2H DPOComments * ODOE
Subject: Fw: Scan to Email
Attachments: EmailScan_08162019.pdf

August 14, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project
9/28/2018; Draft Proposed Order 5/23/2019

To: Chairmen Beyeler and Members of the Council

I appreciate the opportunity to comment on the B2H Draft Proposed Order. The Oregon National Historic Trail will be significantly affected by the B2H Transmission Line.

The Draft Proposed Order identifies significant impacts to the Oregon Trail in several Exhibits, including Exhibit C: Property Location and Maps; Exhibit L: Protected Areas; Exhibit R: Scenic Aesthetic Values; Exhibit S: Cultural Resources; Exhibit T: Recreational Facilities; and Exhibit X: Noise.

B2H crosses the Oregon Trail at least 8 times. EFSC has done a reasonable job of protecting the Trail during construction and operation, if the proposed requirements are followed, **except at the Oregon Trail Interpretive Center at Flagstaff Hill.**

The B2H Transmission Line should be buried for approximately 2 to 2 ½ miles to comply with the exhibits indicated above. Idaho Power has from the early years refused to do any significant analysis for this option. IPC uses cost as the reason for stating that undergrounding is not feasible. Cost is not a specific standard, and costs are the responsibility of the Oregon Public Utilities Commission during rate considerations. EFSC has determined that IPC has the Financial ability even if some partners choose to not participate, so reasonable cost should not be a determining factor for EFSC.

EFSC should refuse to approve the Draft Project Order for the following reasons:

1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," in the context of residential sleeping areas; however, certainly for tourists and visitors to the Interpretive Center and hiking trails noise will be disturbing. Map 23 in Attachment X-1 does not even show the Oregon Trail.
2. Within OAR 345-022-0040 Protected Areas and ODEQ standards 340-035-0000-0100, this area should have been monitored and modeled as a Noise Sensitive Property and was not.
3. Does not comply with Scenic Values from the Blue Mountains Parkway and Oregon Trail Interpretive Center. The OR 86 encourages drivers to STOP and read interpretive signs, so viewer perception and resource change cause significant decrease of scenic values. IPC says no significant impact.
4. The DPO does not comply with Exhibit L Protected Areas. The BLM ACEC at Flagstaff Hill has not considered undergrounding for the protection of the Oregon Trail. No analysis found the pristine, Class 1 swales of the Oregon Trail within the ACEC located at: Lat 44.813762 Long -117.750194 or 44° 48' 48.26"N 117° 75' 57.97"W. IPC proposes to build a new constructed road over the Oregon Trail in the area identified in the location above.

5. The DPO does not meet the standards required for Exhibit T Recreational Facilities, OAR 345-022-0100, especially at the Flagstaff Hill interpretive center, because of:
 - a. It is a BLM ACEC area managed for public tourism
 - b. It is the single most visited tourist facility in Baker County
 - c. The quality of the facility is outstanding
 - d. There is no other place where the Oregon Trail can be seen and interpreted.
6. The cost estimates of IPC do not compare with those of the *Edison Electric Institute*, January 2013 publication "Out of Sight, Out of Mind, An Updated Study of the Undergrounding of Power Lines." This article suggests that for 2.5 miles of rural undergrounding, the cost will be \$67,500,000. This is almost half the IPC estimate.

The Oregon Trail along the route of the B2H has the most damaging effects to its critical historic elements. Once the Trail is gone it cannot be reconstructed or mitigated back to life. Once gone, always gone. The only easily accessible public facility in Oregon is the Flagstaff Hill Interpretive Center near Baker City. The B2H must be buried to preserve this important site.

Considering the reasons above and the unconscionable desecration of our national treasure, the Council Must Deny the site certificate for the Boardman to Hemingway Transmission project.

Thank you,



Signature

Printed Name: Joel Baker

Mailing Address: 1815 20th ST
Baker City, OR. 97814

Email: JoelD.Baker@outlook.com

TARDAEWETHER Kellen * ODOE

From: joel baker <joeld.baker@outlook.com>
Sent: Friday, August 16, 2019 3:51 PM
To: B2H DPOComments * ODOE
Subject: Fw: Scan to Email
Attachments: EmailScan_08162019.pdf

From: Joel Baker <Joel.Baker@HALLIBURTON.com>
Sent: Friday, August 16, 2019 3:37 PM
To: 'joeld.baker@outlook.com' <joeld.baker@outlook.com>
Subject: FW: Scan to Email

From: Joel Baker <Joel.Baker@HALLIBURTON.com>
Sent: Friday, August 16, 2019 2:34 PM
To: Joel Baker <Joel.Baker@HALLIBURTON.com>
Subject: Scan to Email

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Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.

Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,



Name: Joel Baker

Address: 1815 20th ST
Baker City, OR. 97814

TARDAEWETHER Kellen * ODOE

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<insert date>

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR. 97301

Via Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the B2H Transmission Project 9/28/2018; DPO 5/23/2019

Dear Chair Beyeler and Members of the Council:

My comment is about the blasting that would likely be required during the construction phase of the B2H line near MP 106—108 of the IPC-preferred Mill Creek route. Although the application does not specify where blasting will occur, *Attachment G-5 Framework Blasting Plan* states: "Blasting may be needed in certain areas with rocky terrain to excavate tower footings, prepare station pads, and to construct access roads."

The relevant standard is the 345-022-0020 Structural Standard:

"(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;"

My impression from reviewing the application is that the applicant has not fully considered the impacts of blasting on the nearby unstable slope in a populated area of La Grande, Oregon. The map on page 169 of *Exhibit H Geological Hazards and Soil Stability*, shows the B2H line at MP 106—108, where it is within about 2500' of a populated "Unconsolidated Sediments" zone (labeled Qf) and then crosses a "Landslide Deposits" zone (labeled Qls) near MP 108.

The application also mentions the slope instability in a small part of this area, on page 112 of *Exhibit H – Attachment H-1 Appendix B Soils Data Tables and Maps*:

"One of the landslides mapped by Schlicker and Deacon (1971), not included in SLIDO, intersects the IPC Proposed Route between towers 106/3 and 106/4. Based on review of topography and aerial photographs, this mapped landslide may impact the proposed work areas around tower 106/4. A field reconnaissance of this area should be performed as part of the geotechnical exploration program."

My concern is more about the construction process than about the integrity of the towers after construction. The application identifies the problem in general but provides no detail about the blasting or about the potential effects on nearby houses in an area that the City of La Grande designates as a "Geologic Hazard Zone." We know that each tower footing will require a hole 30—50' deep, and that the bedrock underneath the line at MP 106—108 will almost certainly require blasting for efficient excavation. The application does not address this concern, and the proposed construction is simply too close to a populated area to mitigate the risk of damage to homes. The application does not comply with the relevant standard.

Sincerely,



<insert your name> Joel Baker

<insert your address> 1815 20th ST
Baker City, OR 97814

TARDAEWETHER Kellen * ODOE

From: joel baker <joeld.baker@outlook.com>
Sent: Friday, August 16, 2019 3:52 PM
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July 2, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Siting Senior Analyst

Oregon Department of Energy

550 Capitol St. N.E.

Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Re: Geological Hazards and Soil Stability; Exhibit H.

Re: **Geologic Hazard Protection - Drill site 95/3 and 95/4 on unstable and steep slopes in an active seismic zone**

My comment addresses the danger that construction and operation of an additional transmission line in an active seismic zone presents to the public, both local area residents and travelers on the nearby Interstate 84.

The relevant standard is the 345-022-0020 Structural Standard:

“(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;”

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

The construction process is described in detail in 3.9 Mitigation of the Exhibit H of IPC's ASC. Specifically, the area at or near **Drill site 95/3 and 95/4** is shown and described on the following tables and maps:

Exhibit H – Attachment H-1 Appendix B Soils Data Tables and Maps by Shannon & Wilson, Inc.:
Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. Sheet 3 of 4

Exhibit H – Appendix C: Summary of Proposed Boring Locations:

Map Sheet 36 - **Drill site 95/3 and 95/4**

Exhibit H – Table C1: Summary of Proposed Borings – Sheet 2 of 8

95/3 – cited for Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 – cited for Angle change along alignment; Road and railroad crossing

Exhibit H - Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5,6

“PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

The relevant standard is the 345-022-0020 Structural Standard:

“(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;”

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).

The applicant has not fully described the risks of heavy construction in this area. What mitigation methods would be required to place earthquake resistant towers on unstable slopes, in an active seismic zone, if the area suffered an earthquake of the intensity that formed these slopes.

Special Paper 6, included on the DOGAMI website, describes an extensive study done in 1979 by the Geoscience Research Consultants in Moscow, Idaho and State of Oregon Department of Geology and Mineral Industries on the seismic history of the Blue Mountains and the La Grande area. The introduction of this paper is closes as follows: “In summary, consistencies of structural trends, compatibility of the Blue Mountain folding to backslope faulting in the La Grande area and systematic distribution in the orientation of linear trends favor northwesterly compression as the tectonic control in the study area. Furthermore, the general lack of interference, or lateral offset of linears or of any of the intersecting faults, as is discussed in the next sections, **suggest that all of the post-Columbia River Basalt Group structures in the area near La Grande have been created in response to only one major tectonic episode.**”

Further in the same paper “The Graves Creek-Rock Creek-Coyote Creek area has the greatest density of faults within the study area. At least six major and several minor northwest-trending faults of the Rock Creek fault system occur in the area (Plate 1). The Graves creek fault can be traced from the eastern edge of Sec. 7, T35S, R37E to the southern boundary of the Hilgard 7 ½ - minute quadrangle, a distance

of about 6 mi (10 km). The Graves Creek fault probably extends farther southeastward beyond the map area. Offset across this fault is 265 ft (80 km) in Sec. 34, T 35S, R37E.”

The IPC ASC to the EFSC (Exhibit H – Attachment H-1, page 28) includes the following brief description of the area: The Mt. Emily Section (802) is described as “an 18 mile fault, forming a steep range front from Thimbleberry Mountain to the mouth of the Grande Ronde River Canyon, by Personius, compiled by the U.S. Geological Survey website and assessed in 11/16/2016.”

“The West Grande Ronde Valley fault zone may be active. Subtle topographic features indicate that there may have been earthquakes that broke through the ground surface as recently as the last 10,000 years. Previous studies indicate that the West Grande Ronde Valley fault is capable of generating a magnitude 7 earthquake.” From Summary of the La Grande Quadrangle Geology” also on DOGAMI website.

DOGAMI recommendations for protection of the Portland’s infrastructure HUB in the secondary flood zone of a possible Cascadia Subduction Fault earthquake/tsunami have been largely unimplemented for lack of funding, as is the ShakeAlert system which, unless funded will not be available in Oregon until 2021 at the earliest. ShakeAlert is an early warning system being developed by USGS. Oregon made national news when “Governor Brown signed HB 3309, which amended the previous law to no longer prohibit the construction of building such as hospitals and schools and other emergency-preparedness centers in tsunami inundation zones along the coast. The bill had bipartisan support and bucked standards held for twenty-five years keeping those facilities out of harm’s way should a massive tsunami hit.” Wisely, some cities along the coast continue following original DOGAMI assessments and recommendations concerning new infrastructure built away from the inundation zone. How this will impact funding assistance to move the existing schools, hospitals, city halls and emergency services?

Clearly Oregon legislative priorities have moved away from seismic hazard emergency preparedness, but this potential hazard to the area brings with it considerable risks, despite the proposed construction “mitigation” methods. It is within the EFSC’s judgment to decide against adding an additional hazard to the natural and infrastructure hazards the citizens of this area already live with.

There are dangers both to human safety and the environment with an additional transmission line in a possibly quite seismic area, so close to the heavily traveled I84 transportation/utility corridor, the Hilgard Junction State Recreation Area and the Grande Ronde river. Further study and subsequent intrusive construction will not reduce the risks to the safety of the travelers through this canyon or the residents of the valley nearby. The application does not comply with the relevant standard.

Remedies:

Additional study of the probable seismic hazards; including ground failure, landslide, cyclic softening of clays and silts, etc. as required by OAR 345-022-0020, Rev. subsection 12. “The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site that are expected to result from all maximum probable seismic events. As used in this rule seismic hazard includes ground shaking, ground failure, landslide, liquefaction, triggering and consequences (including flow failure, settlement buoyancy, and lateral spreading), cyclic softening of clays and silts, fault rupture, directivity effects and soil-structure interaction.

Disqualify this route as an unreasonable risk for a site for an additional high voltage power facility and too close in proximity to Hilgard State Recreational Area, and the I84 transportation/utility corridor.

Additional letter of credit dedicated solely for financial restitution necessary to restore potential damage caused by any of the above in an amount sufficient to restore the surrounding environment and infrastructure, both publicly and privately owned.

Thank you for your consideration,

Sincerely, *Joel Baker*

Name: *Joel Baker*

Address: *1815 20th ST
Baker City, OR. 97814*

References

Barrash, Warren, John G Bond, John D. Kauffman, and Ramesh Venkatakrishnan, 1980, Geology of the La Grande Area, Oregon: Oregon Department of Geology and Mineral Industries Special Paper 6.

Brown, Jordyn The Register-Guard; July 12, 2019 *Oregon's Lawmakers put earthquake, hazard preparation on back burner.*

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 *SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2*; Oregon Department of Geology and Mineral Industries.

Ferns, Mark L. McConnell, V. S., Madin, I.P., and Johnson, J.A., 2010 Geology of the Upper Grande Ronde Basin, Union County, Oregon: Oregon Department of Geology and Mineral Industries Open-File Report 2003-11, 85.0, scale 1:125,000.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy, Energy Facility Siting Council, OAR Amend: 345-022-0020; *Structural Standard* EFSC 2-2017 Chap. 345, Division 22; General Standards for Siting Facilities. Effective date: 10/18/2017.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018, Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035, page 28 and elsewhere.

Loew, Tracy, *Salem Statesman Journal* ; June 24, 2019 *Oregon Legislature Repeals Tsunami Zone Building Law.*

TARDAEWETHER Kellen * ODOE

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Sent: Friday, August 16, 2019 3:54 PM
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August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's stated timber values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include the value of any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant claims that the value of the land in the right of way will not be significantly reduced due to the owner's opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive.

It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for ¼ mile (1,320 ft.)

of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing ¼ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence. In other words, the cost of fencing an acre of lost forest land would exceed the value the applicant claims the land would add to the local economy per acre for the 50 years the transmission line is predicted to be in place.

The applicant also claims that the transmission line right of way through forest lands will not cause a substantial change in accepted forest practices or cause a significant increase in the cost of accepted forest practices on lands to be directly impacted by the Project or on surrounding lands. Removing trees from land currently being used to grow them certainly will create a substantial change in accepted forest practices. It also will substantially increase the costs of growing and harvesting trees on the surrounding lands. Soil compacted by heavy equipment used to access the line will discourage regrowth.

The transmission line will make it impossible to use aerial equipment to harvest trees on steep hillsides adjacent to the line; it will increase costs of harvest due to the need to avoid equipment contact with the transmission lines, avoid trees falling on the transmission lines, require new access and egress from the forested lands that avoid having log trucks and equipment moving below the transmission line, It will decrease the harvest along the transmission line due to tree loss along the corridor from wind and weather conditions impacting weakened root infrastructure once the transmission corridor is cleared.


Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming from that activity, but there will be related losses to the productivity of adjacent land, increased costs of harvesting along the transmission line, introduction of noxious weeds, increased risk of wildfire, potential increase in the number of trespassers, interference with wildlife activities including displacement of wildlife to what may be less desirable habitat, opening the area up to increased predation on the multiple non-raptor species utilizing the forested areas, decreased value of land if it is sold, long-term reduction in assessed value of the land, etc. The conclusions stated by the applicant in section 8.0 are false, absolutely without merit.


In addition, the applicant has failed to provide documentation to support their conclusions. The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Therefore, the Council should DENY the application for site certificate.


Signature


Printed Name

Mailing Address: 1815 20th ST
Baker City, OR 97814

TARDAEWETHER Kellen * ODOE

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August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
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In addition, the applicant has failed to provide documentation to support their conclusions. The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Therefore, the Council should DENY the application for site certificate.


Signature


Printed Name

Mailing Address: 1815 20th ST
Baker City, OR 97814

ESTERSON Sarah * ODOE

From: Tork Ballard <tballard@centurylink.net>
Sent: Thursday, August 22, 2019 12:48 PM
To: B2H DPOComments * ODOE
Subject: Aug 21 2019.docx b2h comment.docx
Attachments: Aug 21 2019.docx b2h comment.docx



Virus-free. www.avast.com

Aug 21 2019

Energy Facilities Siting Council

Subject: Idaho Power application for a Site Certificate for the Boardman to Hemingway Transmission Project.

We oppose this project. Our families have inhabited this beautiful part of the state for over a century and some have ties to the native inhabitants. The sight and thought of this eyesore is so unacceptable to us. The over all negative impact is hard to address, with that said we will voice our concerns and also need to mention, we have attended more then one meeting and find every argument against the B2H line to be very valid.

Need. Idaho Power has failed to show a pressing need for these lines, in fact research shows the demand has been steady for over 20yrs. Innovation and conservation are effective when utilized. Across the country from 2010 to the present, residential sales have declined by 3%, on average, using 7% less electricity. Population has increased but the drop in average demand has decreased even faster. The increase in population has been matched step-for step by renewables and by more efficient use of energy. Idaho Power hasn't included all existing transmission capacity they already have to the Northwest energy market creating the illusion a shortage exists for transmission lines.

Security. These lines are vulnerable to sabotage. Research and real life experience argue strongly for tuning away from ever larger grid components and towards the emerging modular grid. The failure of one large transmission line can cascade across and entire region with cities and rural areas blacked out and vulnerable.

Cultural/historical...Idaho Power and their consultants have not acknowledged trail crossings show on submitted maps and do not acknowledge visual intrusion of the line for 10 miles per standards, and only upon ODOE's RAI's put into documents some trail protections. This has been consistent from the BLM process to current day. Idaho Power does not comply with the state standards for cultural resources OAR 354-022-0090, or 345-022-0080, Scenic resources.

We have voiced some but not all concerns, but know the council is hearing from many besides us. Knowing all concerns have been presented, now it's the councils obligation to make a just decision and Deny the Site Certificate.

D.M. and Wanda Ballard

18850 W. Campbell Loop—Baker City, Oregon 97814

TARDAEWETHER Kellen * ODOE

From: Andy Baltensperger <abaltens@alaska.edu>
Sent: Friday, July 26, 2019 2:58 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Energy Facilities Siting Council letter.docx

Please find attached, my comments for the Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project.

Thank you,
Andy Baltensperger

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR. 97301

Via email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

I am writing in opposition to the application for a site certificate for the B2H transmission project. I am a landscape ecologist and new resident to La Grande, OR and I am specifically concerned that this proposed project does not adequately address impacts to the local viewshed. I bought my house specifically for its view of the Blue Mountains to the west. This view currently does not include a set of grotesque, metal towers over the hill and I would like it to remain this way.

The Draft Proposed Order fails to support Applicant's assertion that the Oregon Trail Interpretive Center, a protected area, will not suffer significant negative visual impacts from this project as delineated in OAR 345-022-0080. Visual Impacts, (Exhibit R p. 79) The development will create an energy corridor directly in front of the Interpretive Center, opening up the area to construction of future transmission lines and utility lines which could be developed without consideration of damages to this site. The effects of placing this line as close as 105 feet to the Interpretive Center is significant. Is a set of giant powerlines really what we want new visitors of La Grande to be welcomed by? The structures proposed will present a wider profile than standard structures and will be significantly taller than existing transmission lines in the viewshed. The applicant has exaggerated the cost of placing the line underground, failed to provide documentation to support its claims and proposed no meaningful mitigation. An independent study of costs to bury transmission lines in geographically similar areas is necessary to meet the standard of preponderance of evidence.

I am also concerned about impacts to the historic Oregon Trail corridor, which extends to the northwest from the Interpretive Center and crosses the proposed powerline route just above La Grande. The application does not adequately address potential impacts to this historic trail and to any adjacent archaeological resources. I would encourage further study of these impacts but I am unclear how an infrastructure project of this magnitude could avoid adversely affecting historical landmarks and local viewsheds. None of these impacts are in the interest of the La Grande or its residents. Please deny this site certificate!

Thank you for your consideration,

Andy Baltensperger
1707 Cedar St.
La Grande, OR 97850

RECEIVED

AUG 22 2019

Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St. NE

Salem, Oregon 97301

DEPARTMENT OF ENERGY

email: B2H.DPOComments@Oregon.gov

The introduction of the Boardman to Hemingway Transmission line creates an unacceptable increased risk of catastrophic fire. Of the six counties in Oregon which the transmission line would cross, five of them are rated as having a high risk of wildfire.

Idaho Power has indicated that they do not plan to provide their own fire protection, but plan instead to rely upon local fire fighting resources to deal with fires caused by the transmission line. They have rejected the suggestion from Baker County that they develop a specialized fire fighting resource to fight wild fires in the unpopulated areas the transmission line would cross and provide them with the specialized equipment that local fire departments in the area are lacking. They also have not responded to comments from Union County Fire Departments Indicating a need for them to provide specialized equipment to address wildfires.

The issue is further problematic due to the fact that at least in Union County, the developer has stated their intent to rely upon local firefighting resources. In Union County there are only four fire departments that are not Rural Fire Protection Districts, RFPD's. These RFPD's are trained to fight structural fires, not wildfires. Further, the definition of a RFPD limits them to "providing structural fire protection to its constituents." Idaho Power must establish their own methods of fighting wildfires along the transmission line. They cannot rely upon the local resources identified to address structural fires to provide protection from wildland fires. GAR 345-022-0110

P Barreto

(Patrice Barreto)
60214 Morgan Lake Rd.
La Grande, OR 97850
541-786-4388

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's stated timber values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include the value of any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant claims that the value of the land in the right of way will not be significantly reduced due to the owner's opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right-of-way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive.

It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for ¼ mile (1,320 ft.)

of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing ¼ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence. In other words, the cost of fencing an acre of lost forest land would exceed the value the applicant claims the land would add to the local economy per acre for the 50 years the transmission line is predicted to be in place.

The applicant also claims that the transmission line right-of-way through forest lands will not cause a substantial change in accepted forest practices or cause a significant increase in the cost of accepted forest practices on lands to be directly impacted by the Project or on surrounding lands. Removing trees from land currently being used to grow them certainly will create a substantial change in accepted forest practices. It also will substantially increase the costs of growing and harvesting trees on the surrounding lands. Soil compacted by heavy equipment used to access the line will discourage regrowth.

The transmission line will make it impossible to use aerial equipment to harvest trees on steep hillsides adjacent to the line; it will increase costs of harvest due to the need to avoid equipment contact with the transmission lines, avoid trees falling on the transmission lines, require new access and egress from the forested lands that avoid having log trucks and equipment moving below the transmission line, It will decrease the harvest along the transmission line due to tree loss along the corridor from wind and weather conditions impacting weakened root infrastructure once the transmission corridor is cleared.

Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming from that activity, but there will be related losses to the productivity of adjacent land, increased costs of harvesting along the transmission line, introduction of noxious weeds, increased risk of wildfire, potential increase in the number of trespassers, interference with wildlife activities including displacement of wildlife to what may be less desirable habitat, opening the area up to increased predation on the multiple non-raptor species utilizing the forested areas, decreased value of land if it is sold, long-term reduction in assessed value of the land, etc. The conclusions stated by the applicant in section 8.0 are false, ^{and} absolutely without merit.

In addition, the applicant has failed to provide documentation to support their conclusions. The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

* The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Therefore, the Council should DENY the application for site certificate.



Signature

Carolinè Barnes

Printed Name

Mailing Address:

63101 Buchanan Lane
La Grande OR 97850

RECEIVED
DES
Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

As a Professional Civil Engineer and Construction specialist,

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within 1/4 mile of blasting site.

Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

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AUG 22 2019

DEPARTMENT OF ENERGY

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,



Name: *Caroline Barnes*

Address: *63101 Buchanan Lane
La Grande OR 97850*

July 27, 2019

Energy Facilities Sitting Council
c/o Kellen Tardaewether, Sitting Senior Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018;
Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

a Professional Civil Engineer, resident of La Grande,
I am an ~~Eastern Oregonian~~ and have traveled and recreated in the vicinity of Hilgard State Park for many years. I have concerns about the steep slopes, soils hazards, landslide risks, and erosion impacts that the construction of the Boardman to Hemingway Transmission line will pose in an already dangerous canyon.

Re: Soil Protection - Drill site 95/3 and 95/4 on unstable and steep slopes
345-022-0020

(c) ...*The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...*

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council;
effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500 kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990-Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 95/3 and 95/4 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. (sheet 3 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

95/3 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 - Angle change along alignment; Road and railroad crossing

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5, 6

“PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

Idaho Power Corporation, in Exhibit H 2.2.4 states “*The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard.*” Idaho Power Corporation admits in ASC page B-12 that “*The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes*”

presenting design and construction challenges.” IPCs stated original intention to the EFSC was the following: “Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line.

Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the winter storms and the spring melt can be precipitous and unpredictable.

The area surrounding the drill site **95/3 and 95/4** is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

Conclusion and Requested Relief:

Drill site 95/3 and 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002 should be removed for consideration as a site for a transmission “facility.” While Idaho Power Corporation attempts to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

Solution
I appreciate your consideration and your attention to this matter.

Sincerely,



Signature



Printed Name:

Mailing Address:

*63101 Buchanan Lane
La Grande OR 97850*

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; Soil Protection

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

As a Professional Civil Engineer with nearly 30 years of practice in OR, WA & AK,

I am very concerned about the Boardman to Hemingway Transmission Project as it is proposed. My concerns are for the safety of myself and all of the citizens of La Grande if this line is permitted. My primary concerns are slope instability and wildfire hazard.

The proposed route sited to the west of La Grande is placed on a ridge noted to have instability and high risk for slides. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in not heeding the geologists' warnings. The area down slope from the proposed B2H line lies the Grande Ronde Hospital and Clinics, which employs hundreds of people and is the critical access hospital for this region. La Grande High School and Central Elementary School are also positioned down slope from the proposed towers. At least 100 homes are positioned down slope of the proposed towers. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker, and Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (2015), Nuns Fire in Sonoma County (2017), which were all attributed to transmission.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city limits, including medium density housing within the city as well as Grande Ronde Hospital. If a line from this proposed route were to spark a fire, La Grande residents would have little time to react. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in grasslands. A fast-moving fire starting at the B2H lines could move to residential areas of La Grande and HOSPITAL in 10 minutes. This is frightening and an unacceptable risk for our citizens.

simply The current proposal for a Boardman to Hemingway transmission line does not adequately address the issue of landslides, ~~basically~~ by stating it will be mitigated somehow when the time comes to build. The proposal offers no analysis of wildfire risk, which is an unacceptable omission. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of La Grande.

The Council should DENY the request for a site certificate.

Sincerely,



Name: *Carolaine Barnes*

Address: *63101 Buchanan Lane*
La Grande, OR. 97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

The application is incomplete as Section X must include information regarding all receptors within ½ mile of site and include all noise sources required to be included in establishing the noise level generated directly or indirectly by the development. Idaho Power has not provided information adequate to determine if they are able to meet the noise standard, even with site certificate conditions.

IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within ½ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, it's related or supporting facilities, all temporary laydown and staging areas and all corridors and micrositing corridors proposed by the applicant" (OAR 345-001-0010(55)).

1. The applicant lists the areas which are included in the site boundary in Exhibit F, Page F-2, however, they failed to include noise modeling or include all the receptors within the ½ mile area beyond the entire site perimeter.
2. The applicant failed to do noise modeling for all noise sensitive property as they did not include churches, schools, libraries, or hospitals as is required by the definition in OAR 340-035-0015(38)
3. The applicant also failed to include the noise identified in OAR 340-035-0035(1)(b)(B)(ii) as not being exempt from the ambient statistical noise level indirectly caused by or attributable to that source including all its related activities. This section states, "Sources exempted from the requirements of section (1) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement." The application is not complete prior to the applicant finishing Exhibit X to include all sources required by this rule as

well as all receptors within ½ mile of the entire site boundary. No decisions can be made absent an accurate accounting of the predicted noise impacts which has not occurred.

No Proposed Order can be issued until the developer has shown that they meet the requirements at the time a site certificate is issued. OAR 345-015-0190(5) allows the Department to find the application is complete when the applicant has submitted information adequate for the Council to make findings or impose conditions on all applicable Council standards. While not all information required by OAR 345-021-0000 and 0010 must be submitted, there must be information adequate to show they meet the requirements or will meet them by implementing the conditions contained in the site certificate. The draft site certificate does not assure that the noise standard will not be exceeded, and the developer has not provided noise modeling or included modeling for all required sources of noise to establish the ambient statistical noise level of the development for all NSR's. Missing information includes: 1. Identification of all noise sensitive receptors within ½ mile of the entire site boundary, 2. Identification and notice to the owners of all noise sensitive properties; and 3. Modeling which includes Items (5)(b) - (f), (j), and (k) which cannot be excluded from the ambient noise measurement.

Sincerely,



Signature

Printed Name: *Caroline Barnes*

Mailing Address: *63101 Buchanan Lane
La Grande OR 97850*

August 12, 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

I am very concerned about the following findings in the Idaho Power application:
Page 62 (T-57) ASC refers to "extensive work in the siting study of the Morgan Lake Alternative," ~~and~~ *and*
~~it was extensive because it is entirely inaccurate:~~ *appears to be inaccurate due to several findings such as:*

Page 145 (T-4-46) Morgan Lake Park is described as 204 acres, containing one lake, which is developed with primitive campsites and fishing docks. *However,*

Morgan Lake Park actually contains two lakes. Morgan Lake covers 70 acres; the other, Twin Lake, [also known as Little Morgan Lake] is in plain sight, within 300' of Morgan Lake; it covers 27 acres.

* Twin Lake is undeveloped, a wild life and bird sanctuary, home to nesting bald eagles. It is designated as protected wetlands. In their application, Idaho Power conveniently omits any references to Twin Lake.

Page 156, (T-4-6) ASC purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch amoeba-shaped area is Morgan Lake Park. That's wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it's difficult to believe "extensive work on this siting study" ever occurred.

The applicant also used aerial photography to identify and avoid, where practical, irrigation pivots, houses, barns, private runways, other structures (e.g., wind turbines), and land use features. The corridors were adjusted using topographic maps to avoid or minimize distance across very steep slopes and other physical features less desirable for transmission line construction and operation. The corridors were again checked against the constraint and opportunity geographic information system (GIS) database to avoid, where possible, exclusion areas and areas of high permitting difficulty such as potential Oregon Department of Wildlife (ODFW) Category 1 habitats. The applicant then grouped the alternative corridors into 14 regions and evaluated on the basis of permitting difficulty, construction difficulty and mitigation costs. Using the constraint database, which incorporated the eight siting factors, the applicant reviewed the alternatives to determine the most reasonable corridor within each region. (DPO p. 11)

It is distressing to think that this is only one of many errors in Idaho Power's ASC. If the IPC surveying ^{and} engineering staffs are unable to detect a 27 acre lake within a 204 acre park, it's disquieting to imagine the difficulties in identifying and analyzing less obvious and life-threatening situations like fault zones, slide areas and other potential dangers to public safety -

*incomplete and erroneous
✓ representative*

If this ~~slipshod~~ effort is ~~typical~~ of IPC's ~~careful~~ attention to engineering a route, it may also explain IPC's egregious error in choosing to site the B2H on their preferred Mill Creek or alternative Morgan Lake route rather than on the carefully studied and analyzed BLM Environmentally Preferred route.

Following the DEIS, Idaho Power made a hasty and ill-advised effort to avoid litigation threatened by ~~the~~ individuals whose remote properties and summer cabins would have been impact by the line. If Idaho Power had chosen to follow the BLM Environmentally Preferred route, miles to the west of La Grande, rather than in the immediate view of 13,000 La Grande residents, there might have been ten people at the public meetings in La Grande, rather than the hundreds who have consistently appeared to protest various serious problems associated with the routes proposed for the B2H. The haste of this effort is evident in the abundant errors of omission and misinformation typical of the B2H ASCand DPO which will be addressed in a separate comment.



Signature

Name: *Caroline Barnes*

Address: *63101 Buchanan Lane
La Grande OR 97850*

August 12, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project
9/28/2018; Draft Proposed Order 5/23/2019

To: Chairmen Beyeler and Members of the Council

I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project. I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous times in **Exhibit S** and the **Historic Properties Management Plan and Programmatic Agreement**. OCTA does NOT believe that Exhibit S Historic Properties Management Plan is complete in 7.2.3 Field Crew, and offers this additional condition.

ADDITIONAL CONDITION #1 OCTA recommends that the Council add an Oregon Trail expert to the Cultural Resource Team. This Oregon Trail individual will have qualifications similar to Field crew members. For example, they will have an undergraduate degree in anthropology, archaeology, or in a field such as geology, engineering or history. It will not be necessary to have attended a field school. This individual will be recommended by the National OCTA President and agreed to by the Field Director.

The field surveys, even with SHPO and NPS data, have missed and/or mislabeled some sections of the emigrant trail. OCTA wants the public to know where the Trails are and I do too! OCTA over the years has marked the trail location with wooden signs, small triangles attached to trees, and more recently, carbonite posts and steel rails. Most private property owners are proud of the trail on their property, and after obtaining permission allow the public to walk and hike on the trail.

* Idaho Power and their consultants have not acknowledged trail crossings shown on submitted Maps and do not acknowledge visual intrusion of the line for 10 miles per standards, and only upon ODOE's RAI's, put into documents some trail protections. This has been consistent from the BLM process to current day.

Considering the points above, Idaho Power does not comply with the state standards for cultural resources OAR 354-022-0090, or 345-022-0080, Scenic resources. **EFSC Must Deny the Site Certificate!**



Signature

Printed name: *Caroline Barnes*

Mailing address: *63101 Buchanan Lane
La Grande OR 97850*

Email address:

phone number: (optional)

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

APPLICANT FAILED TO INCLUDE ALL REQUIRED SOURCES OF NOISE IN THEIR MODELING OF NOISE IMPACTS OF DEVELOPMENT

Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (l) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement."

The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

The application is incomplete. Without having the information regarding these additional noise sources, the department and the siting council lack the information regarding how many noise sensitive properties are impacted and by how much.

* A proposed order cannot be issued until the developer submits all the information regarding the noise impacts of this development. This information must be available to decide if the standard is met or if it can be met with additional site conditions.

Sincerely,



Signature

Printed Name: *Caroline Barnes*
Mailing Address: *63101 Buchanan Lane*
La Grande OR 97450



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) ROGER BARNES

Mailing Address (mandatory) PO Box 1224
LA GRANDE OR 97850

Phone Number (optional) 541 786-1773 Email Address (optional) _____

Today's Date: 6/20/19

Do you wish to make oral public testimony at this Hearing: Yes X No _____

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) LOIS BARRY

Mailing Address (mandatory) P.O. Box 566
LA GRANDE, OR 97850

Phone Number (optional) () Email Address (optional) loisbarry31@gmail.com

Today's Date: 6/20/19

Do you wish to make oral public testimony at this Hearing: Yes X No

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
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Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

Page 46	Page 48
<p>1 fire start, possible limited visibility preventing early 2 detection, possible spotting from a remote ignition, and 3 other variables bringing wildfire to the transmission 4 line route to suppress the incident in time to stop 5 encroachment into the city limits and to save structures 6 in the Wildland-Urban Interfaces that are also in 7 proximity to the transmission line route? 8 These factors must be taken into account 9 before approval and construction of the Boardman to 10 Hemingway system. 11 In Oregon on June 14 -- 12 HEARING OFFICER WEBSTER: Mr. Rosenbaum, we 13 are out of time. 14 MR. MICHAEL ROSENBAUM: I have got another 15 minute. Okay? 16 HEARING OFFICER WEBSTER: Okay. 17 MR. MICHAEL ROSENBAUM: In Oregon, on June 14, 18 2019, according to "The Statesman Journal," Pacific 19 Power, with approximately 600,000 end-user customers, 20 proposed to shut down electricity during extreme weather 21 events, which will help limit the effects of the grid on 22 wildfire. It is likely that other Oregon power 23 companies with local end users will follow suit, in my 24 estimation. 25 In California, PG&E has recently cut power in</p>	<p>1 of wildfire intrusion and exposure. It would put values 2 at risk with a failed line on the ground or involvement 3 of transmission lines and support structures in a 4 wildfire. Values such as firefighting personnel and 5 equipment, homes, structures, including medical 6 facilities, businesses, infrastructure, private 7 timberlands and pasture. 8 If the system is not a causative factor in a 9 wildfire start, it could be a contributing factor in the 10 rapid acceleration of unchecked wildfire spread. 11 Should you approve this transmission line 12 route through the Blue Mountains, and specifically in 13 proximity to La Grande, you are quite literally playing 14 with fire. 15 HEARING OFFICER WEBSTER: Thank you. 16 After we hear from Ms. Barry, we will hear 17 from John Anderson. 18 MS. LOIS BARRY: I'm Lois Barry, L-o-i-s, 19 B-a-r-r-y. I live at 60688 Morgan Lake Road in 20 La Grande, which appropriately enough is the 150 acres 21 that burned in a 1973 forest fire that Mike Rosenbaum 22 just referred to. That is the fire that endangered the 23 entire town of La Grande and especially the hospital. 24 At the moment, the current proposed Mill Creek 25 route of the B2H would put three towers right across the</p>
Page 47	Page 49
<p>1 extreme weather conditions in several northern 2 California counties, including Butte County where 3 Paradise is located. 4 Note that the Soda fire in 2015 in southwest 5 Idaho and Oregon was not caused by a failure in Idaho 6 Power's system, but did require the company to replace 7 2.5 miles of transmission line. I ask: What is the 8 guarantee to the people of La Grande, Oregon, that Idaho 9 Power, with no local end-user customers, will shut power 10 generation in the event of red flag warnings locally for 11 extreme conditions, including low RHs of single digits 12 to the low 20 percents, lightning activity levels of 4 13 and higher, extended high temperatures, severe 14 thunderstorms with attendant high outflow winds? 15 I haven't gone into the issue of the changing 16 climate of the Blue Mountains and also the frequent 17 changes in weather patterns from year to year during 18 fire season. The estimate in the Blue Mountains is the 19 temperatures could increase 4 1/2 to 6 1/2 degrees over 20 the next 30 years. 21 In conclusion, I propose that the Boardman to 22 Hemingway transmission line, with the suggested routes 23 in close proximity to the City of La Grande and 24 structures in the Wildland-Urban Interface, would 25 contribute to the vulnerability and the high probability</p>	<p>1 middle of that 150 acres of 40-foot high pine trees that 2 have regrown in the last 50 years. That was an aside. 3 Now, I have two statements. I realize that 4 the mission of the EFSC committee is to choose a route 5 for the B2H and not to decide if it's a good project. 6 Even so, you should know that the B2H project has a 7 basic flaw. It was discussed as early as 2006, and 8 those plans have not changed in 13 years: It is no 9 longer needed. And if it were needed, the BLM 10 environmentally-preferred route should be the route of 11 choice. If you approve the site application for the B2H 12 now, whatever route is chosen, will become the site of a 13 \$1.2 billion stranded asset. 14 My second point. I'm a retired professor. I 15 taught research writing and critical thinking for 16 25 years. And I have carefully read several relevant 17 sections of Idaho Power's application. It's a 18 substandard piece of work. It's replete with obvious 19 inaccuracies and unsupported conclusions. 20 And here is a clear example of a factual 21 inaccuracy: Page 62 refers to, quote, "extensive work 22 in the siting study of the Morgan Lake Alternative," 23 unquote. I doubt it was extensive because it's 24 completely inaccurate. Morgan Lake Park is described as 25 204 acres, containing one lake, which is developed with</p>

<p style="text-align: right;">Page 50</p> <p>1 primitive campsites and a fishing dock. Morgan Lake 2 Park actually contains two lakes. Morgan Lake covers 3 70 acres. 4 The other, Twin Lake, is in plain site within 5 300 feet of Morgan Lake, it covers 27 acres. Twin Lake 6 is undeveloped, a wildlife and bird sanctuary, home to 7 nesting bald eagles. It is designated as protected 8 wetlands. In their application Idaho Power conveniently 9 omits any references to Twin Lake. 10 Page 156 purports to be a map of Morgan Lake 11 Park. According to the map legend the purple crosshatch 12 amoeba-shaped area is Morgan Lake Park. That is wrong. 13 The purple crosshatch is Morgan Lake. The actual 14 boundaries of the 204-acre park are not indicated. And 15 obviously it's difficult to believe "extensive work on 16 this siting study" ever occurred. 17 A specific example of unsupported conclusions: 18 Page 145, Baseline condition, quote: "A goal of minimal 19 development of Morgan Lake Park should be maintained to 20 preserve the maximum natural setting and to encourage 21 solitude, isolation, and limited visibility of users..." 22 Page 146, quote: "The landscape character is 23 natural appearing. Scenic integrity is high as the 24 human developments are harmonious with the landscape." 25 Page 149: "Vegetation will block views of the</p>	<p style="text-align: right;">Page 52</p> <p>1 significant impact." 2 Thank you. 3 HEARING OFFICER WEBSTER: Following 4 Mr. Anderson, we will hear from Jonathan White. 5 MR. JOHN ANDERSON: Thank you. Many of the 6 things I have to say have already been covered. 7 HEARING OFFICER WEBSTER: If you could give 8 your name and your address. 9 MR. JOHN ANDERSON: I'm sorry. John C. 10 Anderson, 409 Sunset Drive, La Grande. 11 Many of the things that I have to say have 12 already been covered quite eloquently, but being short, 13 I will say them anyway. 14 There are many good reasons to abandon Idaho 15 Power's planned B2H power line. Today you may hear 16 testimony regarding economics, geology, eminent domain, 17 view scapes, and many others. 18 I would like to talk about the danger of fire. 19 We know about the Camp Fire and the tragic consequences 20 for Paradise, California. This and other major fires 21 were caused by power lines owned by PG&E. 22 B2H will cross the Blue Mountains west of 23 La Grande through areas of extreme risk of wildfire. 24 This is reckless behavior. 25 In 1973, the Rooster Peak Fire started 6 miles</p>
<p style="text-align: right;">Page 51</p> <p>1 towers from most locations in the park," unquote. 2 In reality, one tower would dominate the 3 entrance to the park, all 130 feet of it in plain view. 4 Within the park, trees bordering the lake are no more 5 than 80 feet high. 130-foot transmission towers will 6 rise more than 50 feet above those trees, dominating the 7 current landscape. 8 Idaho Power simply concludes that the 9 inescapable sight of 500-kV transmission lines and 10 towers around a natural lake setting will have, quote, 11 "no significant impact," on Morgan Lake Park. In 12 research writing this qualifies as wishful thinking. 13 This is the park whose baseline, quote, 14 "should be maintained to preserve the maximum natural 15 setting and to encourage solitude, isolation, and 16 limited visibility of users," unquote, because 50 years 17 ago, no one ever imagined anything larger than a human 18 being might ever intrude. 19 If this application were an airplane, it would 20 have crashed long ago. I urge the Commission to deny 21 this application for a site certificate until each 22 comment submitted at these public meetings and sent to 23 the Commission by July 23rd has been thoroughly analyzed 24 and Idaho Power has provided credible evidence to 25 support each of its conclusions of, quote, "no</p>	<p style="text-align: right;">Page 53</p> <p>1 west of La Grande. When it was discovered it was 2 limited to 1 acre. Days later it had consumed 6,000 3 acres and had burned right up to the hospital's grounds. 4 It could happen again. 5 PG&E and other utilities are shutting down 6 some of their lines during times of high risk. If Idaho 7 Power wisely followed their lead, they would lose the 8 power they say they need during a time of peak demand. 9 Siting a high-voltage line through fire-prone 10 areas is an unacceptable risk to take when this line is 11 not needed. I don't think that Idaho Power has 12 presented plans to mitigate this dangerous situation nor 13 the unforeseen consequences of construction during peak 14 fire season. 15 Please consider the safety of La Grande and 16 its surroundings before you make any decisions. 17 Thank you. My written remarks will follow at 18 a later time. 19 HEARING OFFICER WEBSTER: Thank you. 20 Following Mr. White, we will hear from Susan 21 Badger. 22 MR. JONATHAN WHITE: Jon White, 485 Modelaire 23 Drive, La Grande. 24 My comment is about the blasting that would 25 likely be required during the construction phase of the</p>

<p style="text-align: right;">Page 150</p> <p>1 Idaho Power, same address. So hopefully together we can 2 help answer your questions. 3 MR. MARK STOKES: After listening to all of 4 the comments tonight, we thought there were just a 5 couple of things that we wanted to get corrected on the 6 record. 7 First off, some previous testimony that was 8 presented tonight a statement was made that BPA is not a 9 partner in the project any longer. That is not true. 10 They are still a fully committed partner. In fact, I 11 was in communication with my counterparts at BPA earlier 12 this week before I left town. So I just want to get 13 that on the record. 14 One other item here, a few speakers ago made 15 the statement that Idaho Power does not have any 16 customers in Oregon. And that is not true as well. We 17 serve approximately 15 percent of our total system load 18 is for Oregon customers that are located in Malheur and 19 Baker Counties. So we do have a fairly substantial 20 number of customers in Oregon. 21 So with that, as we have done previous nights, 22 David and I would like to make ourselves available to 23 try and field any questions that Council members may 24 have. 25 VICE CHAIRMAN JENKINS: So Mark and David, I'm</p>	<p style="text-align: right;">Page 152</p> <p>1 HEARING OFFICER WEBSTER: Last call for 2 anybody to give any statements? 3 MR. RANDY SILTANEN: Thank you for letting me 4 speak. My name is Randy Siltanen. My address is 1901 5 Foley Street. 6 So I guess my major question to Idaho Power 7 is: For what just cause? So why are we doing this? If 8 there were no other options it would be understandable, 9 but there are plenty of other options. And we have 10 heard tonight dozens of reasons why this is a bad idea, 11 and we haven't heard any reason why this is a good idea. 12 And what it comes down to, to me, I think, is 13 money. And they think that it will be cheaper in the 14 long run to do this rather than use other new 15 technologies. 16 And Mr. Cimon spoke very eloquently about 17 this, that it's yesterday's news. We have got new 18 options. We have solar and we have wind. And there is 19 a very smart engineer by the name of Mark Jacobson at 20 Stanford who has outlined a really good road map for 21 renewable energy by the year 2030. And it doesn't 22 really make any sense to do this if money is the only 23 reason. 24 I think that's what it is, and I think they 25 are wrong on that. At this point they think it's</p>
<p style="text-align: right;">Page 151</p> <p>1 going to ask a really hard question tonight: Why wasn't 2 the BLM route proposed as a part of your application to 3 EFSC? 4 MR. MARK STOKES: Back when BLM was working on 5 getting their ROD issue, the delays in their process 6 happened, occurred. We had to move ahead with the state 7 process late in the application. And by the time BLM 8 came out with their ROD, their record of decision, it 9 was too late for us to really go back at that point. 10 Now, when I had conversations with BLM's 11 program manager about this and whether that created any 12 issues for BLM, they recognized that the Glass Hill 13 route that you're talking about and the Morgan Lake 14 route were identical on parcels that were under control 15 of BLM, federal government. 16 So the fact that in our state application we 17 had the Morgan Lake route did not influence or impact 18 BLM's record of decision in their process. 19 VICE CHAIRMAN JENKINS: Thank you. 20 HEARING OFFICER WEBSTER: Any further 21 questions? 22 CHAIRMAN BEYELER: Not from me tonight. 23 HEARING OFFICER WEBSTER: Thank you, 24 gentlemen. 25 MR. MARK STOKES: Thank you very much.</p>	<p style="text-align: right;">Page 153</p> <p>1 cheaper, but as Mr. Cimon outlined, it's not. In the 2 long run, it's not cheaper. And there is no just cause 3 to do this. It's not like there is -- it's not like we 4 are trying to provide water to an impoverished area. 5 It's not like bringing electricity to a third-world 6 country who needs it to run their hospital. 7 There is plenty of electricity, there is 8 plenty of ways to get it, and it's not absolutely 9 essential that it goes that way. And yet you are asking 10 people to give up their viewshed. You are putting 11 people's lives at risk for something that is not 12 necessary, other than that it's cheaper, and it seems 13 cheaper, and in the long run it's not cheaper. And that 14 is all I have to say. 15 Thank you. 16 HEARING OFFICER WEBSTER: Thank you. 17 We have run an hour past our allotted time. 18 So anybody -- do you want 2 more minutes, Ms. Barry? 19 MS. LOIS BARRY: This will be very short. But 20 since you have all been so patient and listened for so 21 long and you have heard a lot of important information, 22 one is, from my research, that every single planned 23 transmission line that has been canceled was considered 24 essential until the day it was canceled. 25 But now I think you deserve a laugh. I want</p>

1 to tell you about a B2H presentation about a year ago.
2 They brought several graphic presentations. Someone
3 said they wished Idaho Power would provide a
4 presentation of what the towers would like look around
5 the valley.

6 Well, this was a presentation of what the
7 towers would look like at Morgan Lake. And so there was
8 the blue sky and the green trees and the blue lake,
9 which in their application they describe as level, calm,
10 and reflective, unlike every other lake in America. But
11 rising out of the blue lake was a large transmission
12 tower painted red. And I said, What is that? What is
13 that about? And he said, Well, look at the caption. It
14 says, "Red is invisible."

15 And that was their graphic presentation of how
16 the towers would look at Morgan Lake. Envision this:
17 Red towers are invisible. Okay, gang, that's what you
18 get.

19 Thank you.

20 HEARING OFFICER WEBSTER: It's now 9:01 and we
21 are going to close this hearing. And the next one will
22 be next Wednesday night in Pendleton.

23 (Hearing concluded at 9:02 p.m.)
24
25

1 **REPORTER'S CERTIFICATE**

2 I, BEVERLY A. BENJAMIN, CSR No. 710, Certified
3 Shorthand Reporter, certify:

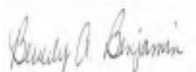
4 That the foregoing proceedings were taken before
5 me at the time and place therein set forth;

6 That the testimony and all objections made were
7 recorded stenographically by me and transcribed by me or
8 under my direction;

9 That the foregoing is a true and correct record
10 of all testimony given, to the best of my ability;

11 I further certify that I am not a relative or
12 employee of any attorney or party, nor am I financially
13 interested in the action.

14 IN WITNESS WHEREOF, I set my hand and seal this
15 3rd day of July 2019.

16
17
18 

19
20 BEVERLY A. BENJAMIN, CSR 710
21 Notary Public
22 P.O. Box 2636
23 Boise, Idaho 83701-2636
24
25

Lois

EFSC Comments on Amended Preliminary Application for B2H
Lois Barry, 60688 Morgan Lake Road, La Grande, Oregon 97850

Two statements:

1) I realize that your mission is to choose a route for the B2H, not to decide if it's a good project. Even so, you should know that the **B2H has a basic flaw**. It was discussed as early as 2006, and those plans have not changed in 13 years. **It is no longer needed. If it were needed, the BLM Environmentally Preferred Route should be the route of choice. If you approve a site application for the B2H now, whatever route is chosen will become the site of a \$1.2 billion stranded asset.**

2) I'm a retired professor. I taught research writing and critical thinking for 25 years. I have carefully read the relevant sections of **Idaho Power's Application**. It's a substandard piece of work. As a responsible piece of corporate writing, I would give it a D, because **it is replete with obvious inaccuracies and unsupported conclusions.**

2) a. A clear **example of factual inaccuracy**:

Page 62 (T-57) refers to "extensive work in the siting study of the Morgan Lake Alternative." I doubt it was extensive because **it is completely inaccurate**:

Page 145 (T-4-46) Morgan Lake Park is described as 204 acres, **containing one lake**, which is developed with primitive campsites and fishing docks.

Morgan Lake Park actually contains two lakes. Morgan Lake covers 70 acres; the other, Twin Lake, [also known as Little Morgan Lake] is in plain sight, within 300' of Morgan Lake; it covers 27 acres.

Twin Lake is undeveloped, a wild life and bird sanctuary, home to nesting bald eagles. It is designated as protected wetlands. **In their application, Idaho Power conveniently omits any references to Twin Lake.**

Page 156, (T-4-6) purports to be a map of Morgan Lake Park. According to the map legend, **the purple cross hatch amoeba-shaped area is Morgan Lake Park. That's wrong.** The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. **Obviously, it's difficult to believe "extensive work on this siting study" ever occurred.**

2) b. A specific example of unsupported conclusion:

Page 145 (T-4-46) Baseline condition: "... A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users..."

Page 146 (T-4-47) "The landscape character is natural appearing. Scenic integrity is high as the human developments are harmonious with the landscape."

Page 49 (T-44) “Vegetation will block views of the towers from most locations in the park.”

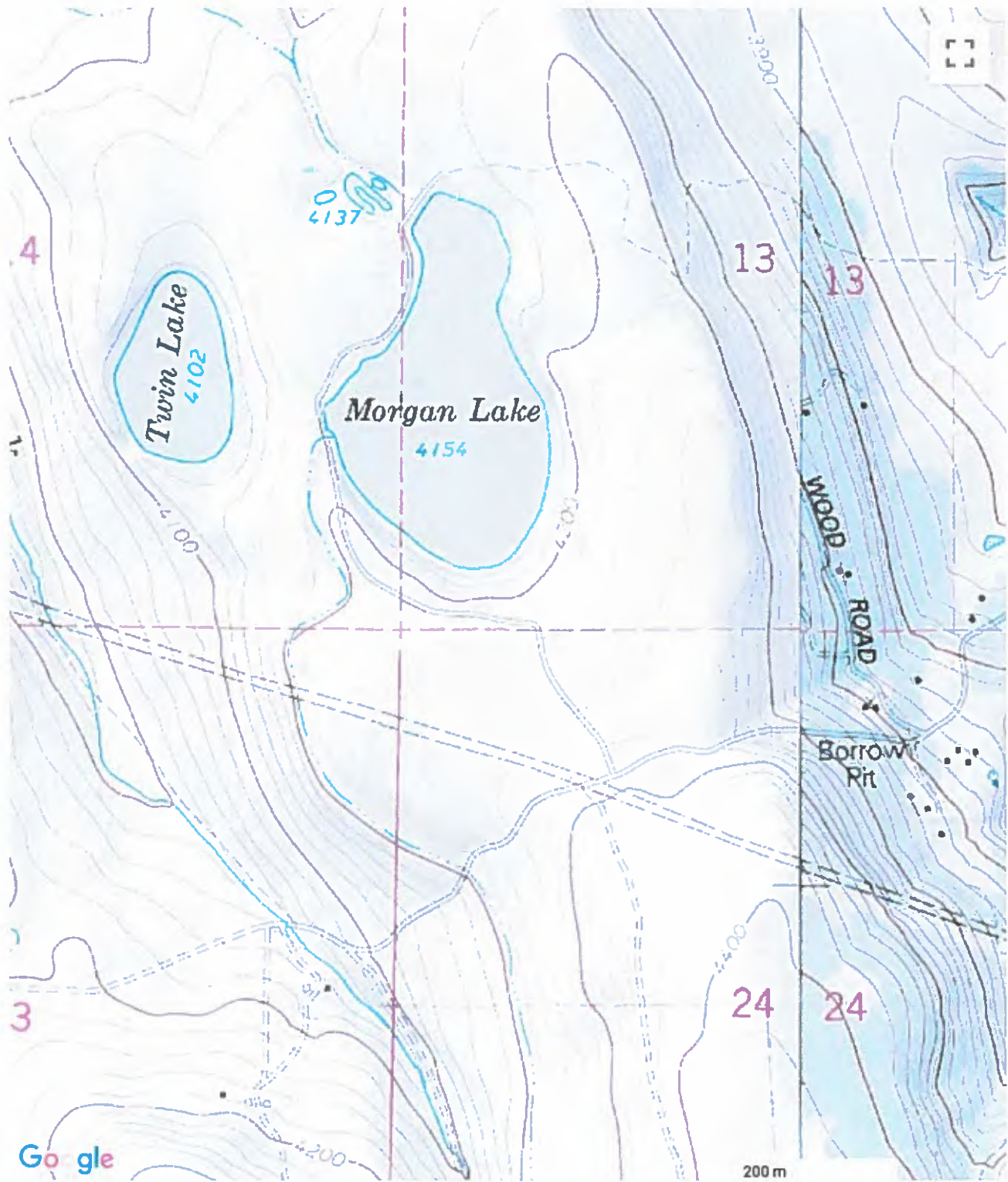
In reality, one tower would dominate the entrance to the park, all 130’ in plain view. Within the Park, the trees bordering the lake are no more than 80’ high. 130’ transmission towers will rise more than 50’ above those trees, dominating the current landscape.

Idaho Power does not provide a graphic representation of Morgan Lake Park, with the accurate height of existing trees, and elevation of towers above the trees. **It simply concludes that the inescapable sight of 500 kV transmission lines and towers around a natural lake setting will have “no significant impact” on Morgan Lake Park. In research writing, this qualifies as “wishful thinking.”**

This is the park whose baseline “should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users” [because 50 years ago, no one ever imagined anything larger than a human being, a “user,” might ever intrude]...

If this Application were an airplane, it would have crashed long ago. I urge the Commission to deny this application for a site certificate until each comment submitted at these public meetings and sent to the Commission by July 23 has been thoroughly analyzed and Idaho Power has provided credible evidence to support each of its conclusions of “no significant impact.”

Morgan Lake Park Topo Map in Union County Oregon



[Print this map](#)

Map provided by TopoZone.com

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" ¹ specifically the Modelaire-Hawthorne Loop) ², hereafter referred to as the "loop", of La Grande to access the site entrance. This residential "loop" was constructed without sidewalks for a new development around the early 1960s.

According to OAR 345-022-0110, Public Services (pg. 5. April 2017) "The applicant...must address all permanent and temporary impacts of the facility on housing, traffic, safety, police and fire protection, health care and schools." ³

My impression from reviewing the application Page 17 ⁴ is that the applicant has not fully examined the final portion of the intended route nor does it fully recognize or address the need for traffic mitigation. This "loop" is the only access to/from thirty-six houses to the rest of the city. The area to the north of the "loop" is occupied by the Grande Ronde Hospital and Medical Clinic. Two blocks to the east is located the local high school and a grade school. ²

In June of 2016, the Grande Ronde Hospital petitioned the City to have a conditional use for a parking lot expansion project next to Hawthorne. The Conditional Use Permit was approved subject to the Condition of Approval that "No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to residential standards and is not designed to support commercial traffic." ⁵

The La Grande Director of Public Works, Kyle Carpenter, provided information regarding the widths for the streets in question. The two streets range from 33 feet to 37 feet in width with no sidewalks. I personally measured the area where the unpaved stem of Hawthorne leaves the "loop" to go up the hill. At the junction it measures 32 feet curb cut to curb cut and narrows to 18-21 feet in width as it goes around the corner up the hill. 6 The Public Works Director also provided pictures of the mapping system showing the existing utilities located in the "loop". 7-8. It should also be noted that from the entrance to the "loop" at Sunset Drive to the entrance of the site the road has a 16% grade.

Attachment U2 9 from the application shows an "Aerial Lift Crane to be Used During Construction" and the Transportation and Traffic Plan on page 19 10 lists a number of other vehicles anticipated to be used. Article 6.6 — Public Street Standards for the City of La Grande Section 6.6.002 states that "Collector Streets are designed to withstand normal trucks of an HS20 loading. Larger trucks are to utilize Arterial Streets where at all possible." 11 The majority of vehicles listed on page 19 exceed that limit and would be using a Local Street in addition to Arterial and Collector Streets. According to the Public Works Director the two streets in the "loop" were designed as Local Streets for residential use, able to accept the pressures of HS20 for the purpose of an occasional need such as a weekly garbage truck or an emergency vehicle but for no more than 5% of the time. The paving construction of these over 50 year old streets in the "loop" was not designed for repetitive use by vehicles heavier than a normal car. These streets in the "loop" have not been repaved, only patched when necessary, since they were first constructed.

The application does not address the "loop" specifically, but 3.1.2 (pg. 19) 10 and Table 6 (pg.17) 12 of the Transportation and Traffic Plan indicate there would be numerous vehicles using this route. Not knowing exactly just which vehicles would be on the "loop" daily but making a conservative estimate of 50 round trips (100 single) it would be a constant parade with one truck every 7.2 minutes. This is unacceptable for numerous reasons including constant excessive noise.

Not only would weight of the vehicles be a problem but the narrowness of the "loop" streets and the ninety degree blind curves that would have to be executed would be either impossible or extremely dangerous considering the turning radius for many of these large vehicles. The

already dangerous situation for a number of driveways that exit onto these "loop" streets at blind curves would be exacerbated. 13-14

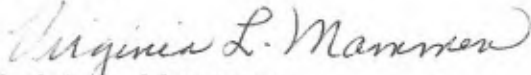
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for walking (children to school, all ages for physical training), driving, or biking. I fear there are standards that are either not being considered or they are intentionally being ignored. There should be some common sense, courtesy and respect for the impact this project would impose on any neighborhood.

Finally, La Grande Ordinance Number 3077, which adopted Oregon State Traffic Laws by reference, states in Section 17 page 8 "It shall be unlawful for any person, firm or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes." Neither Modelaire/Hawthorne Loop nor Sunset Drive are posted as truck routes. 15-16

A site review and traffic plan must be completed prior to the cite certificate being issued and not 90 days prior to construction as stated.

For the above reasons I oppose the usage of the proposed route for the construction of the B2H transmission line.

Sincerely,


Virginia L. Mammen
405 Balsa
La Grande, Oregon. 97850

gmammen@eoni.com

**TABLE 1
 STREET STANDARDS**

Functional Classification	ADT Volume	Speed (mph)	# of Travel Lanes	Travel Lane Width	Turn Lane or Median Width	Bike Lanes	Min. Bike Lane Width	On-Street parking
Downtown Arterial	10,000	20	2-3	11'	11'			both sides
Arterial	10,000	40-55	2-5	12'	4-14'	optional ⁴	5'	none
Major Collector	2,000 - 10,000	25-45	2-3	11'	12'	required	5'	one or both sides
Minor Collector	1,000 - 2,000	25-35	2	11'	none	Optional ⁵	5'	one or both sides
Local Street	0 - 1,000	15-25	2	10'	none	none	none	one or both sides

Functional Classification	Sidewalks	Min. Sidewalk Width	Planting Strip Width ¹	Total Paved Width ²	Total ROW Width ³	Private Access Spacing
Downtown Arterial	required	12'	3'6" ⁶	49'	80'	200'
Arterial	required	5'	8'	36'-72'	80'-102'	200' - 400'
Major Collector	required	5'	8'	52'-60'	62'-90'	150' - 300'
Minor Collector	required	5'	8'	30'-48'	60'-78'	75' - 150'
Local Street	required	5'	8'	28'-36'	40'-66'	Each Lot

¹ A portion of the required planting strip width may be used instead as additional sidewalk width or reduced right of way, as appropriate.

² The minimum of the paved width was calculated with the following assumptions:

Arterials: Two (2) travel lanes, four foot (4') median divider, no center turn lane, no bike lanes.

Major Collectors: Two (2) travel lanes, two (2) bike lanes, no center turn lane, parking on one (1) side.

Minor Collectors: Two (2) travel lanes, parking on one (1) side of street, no bike lanes.

Local Streets: Two (2) travel lanes, parking on one (1) side of street.

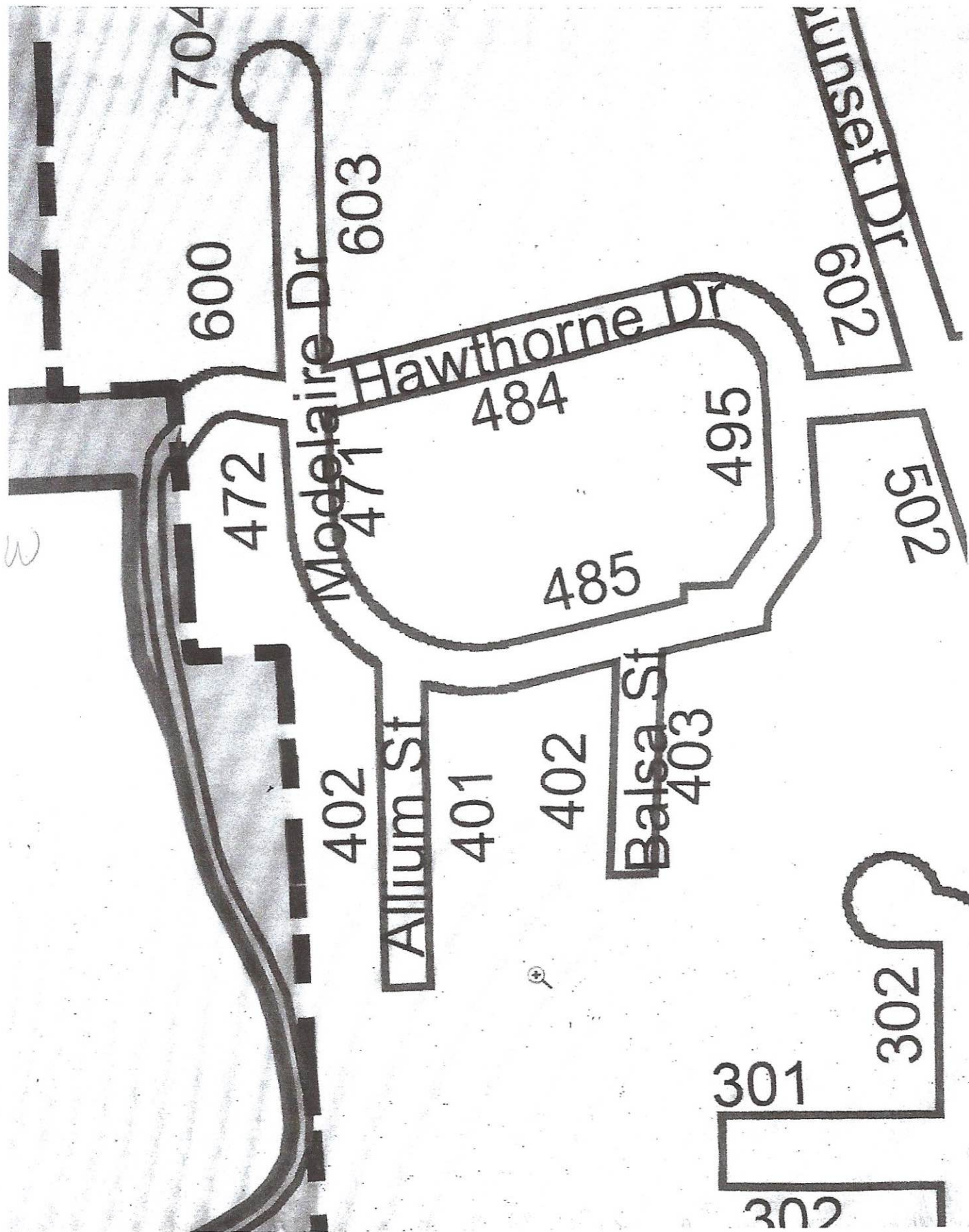
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

³ These right-of-way width ranges are for new streets.

⁴ Bike lanes should be provided on Arterials unless more desirable parallel facilities are designated and designed to accommodate bicycles.

⁵ Bike lanes should be provided on Minor Collectors where traffic volumes or other factors warrant. Otherwise, Minor Collectors should be designed and designated as shared roadway facilities with wide outside travel lanes of 14' on important bike routes.

N



5

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety. Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



Idaho Power Responses to Comments and Requests for Additional Information on the B2H ApASC
from the City of La Grande
Compiled by ODOE. RAI's from the City of La Grande and Responses from IPC

		proposed helipad is a necessary supporting facility.	
U	U- Public Services include utilities such as road systems, water, sanitation services, power, and other amenities necessary for the construction.	Ordinance #2912, Series 1997 gives the City jurisdiction and control on all City street rights-of-way and Ordinance #3077, Series 2009, establishes the process and requirements for permits and licenses for uses of the streets that are not normal uses and may result in damages.	<p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p> <p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><u>Land Use Condition 9: Prior to construction in Union County, the site certificate holder shall complete the following to address traffic impacts in the county:</u></p> <p><u>a. The site certificate holder shall finalize, and submit to the department for its approval, a final county-specific transportation and traffic plan. The protective measures described in the draft Transportation and Traffic Plan in ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</u></p> <p><u>b. The site certificate holder shall work with the Union County Road Department and the City of La Grande Public Works Department to identify concerns related to Project construction traffic; and</u></p> <p><u>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</u></p> <p><u>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</u></p>

IV. CONCLUSIONS

Based on the Findings of Fact above, the Planning Commission concludes that the application meets the requirements established in LDC Articles 8.5 and other applicable codes and Ordinances.

V. ORDER AND CONDITIONS OF APPROVAL

Based on the conclusions above, the Planning Commission approves the Conditional Use Permit as requested, subject to the following Conditions of Approval:

1. No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to a residential standards and is not designed to support commercial traffic.
2. Any existing driveway curb cuts along Hawthorn Drive bordering GRH's property, that are not used for residential purposes, shall be removed and replaced with City standard improvements that exists adjacent to such areas.
3. There is a storm sewer line extending through the project area that shall to be protected. Any improvements that may affect the storm sewer line shall be reviewed and approved by the Public Works Director.

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

1. **Revisions to a Valid Conditional Use Permit:** Any variations, alterations, or changes in a valid Conditional Use Permit requested by the deed holder shall be considered in accordance with the procedures of the Land Development Code as though a new Conditional Use Permit were being applied for.
2. **Public Works Standards:** Where a development involves work within the public right-of-way, a Right-of-Way Permit shall be obtained from the Public Works Department in advance of commencing with any work in the right-of-way. All improvements within the public right-of-way shall be in conformance with the most recent adopted City of La Grande "Engineering Standard Drawings and Specifications for Construction Manual."
3. **Building Permits:** The City of La Grande Building Department shall be contacted early in the process and in advance of development to coordinate and obtain required building, plumbing, electrical and/or mechanical permits. All required permits shall be acquired in advance of construction.

VI. OTHER PERMITS AND RESTRICTIONS

The applicant and property owner is herein advised that the use of the property involved in this application may require additional permits from the City of La Grande or other local, State or Federal Agencies.

The City of La Grande land use review, approval process and any decision issued does not take the place of, or relieve the applicant of responsibility for acquiring such other permits, or satisfy any restrictions or conditions thereon. The land use decision herein does not remove, alter, or impair in any way the covenants or restrictions imposed on this property by deed or other instrument.

The land use approvals granted by this decision shall be effective only when the rights granted herein have been exercised and commenced within one (1) year of the effective date of the decision. In case such right has not been exercised and commenced or an extension obtained, the approvals granted by this decision shall become null and void. A written request for an extension of time shall be filed with the Planning Department at least thirty (30) days prior to the expiration date of the approval.



Virginia Mammen <4gmammen@gmail.com>

Modelaire Roadway Specifications

3 messages

Kyle Carpenter <KCarpenter@cityoflagrande.org>
To: "gmammen@eoni.com" <gmammen@eoni.com>

Fri, Jul 12, 2019 at 1:51 PM

I have attached a couple pictures of our mapping system that will give you a sense of where existing utilities are in Modelaire and Hawthorne. As for the widths of the roadways, I took measurements in multiple places, and found the following:

- Modelaire Drive (F Avenue) between Sunset Blvd and Hawthorne Drive is approximately 33 feet wide with a grade of about 5 Percent.
- Hawthorne Drive is approximately 32 feet wide at the bottom near the intersection of Modelaire/F Avenue and widens to about 34 feet where it intersects Modelaire at the top of the hill. The grade heading up hill is approximately 15.5 Percent.
- Modelaire Drive is generally 36 feet wide with some minor variability generally less than a foot (35' to 37'). On the southernmost segment of the roadway where the majority of the elevation gain is observed the grade is approximately 16 Percent.

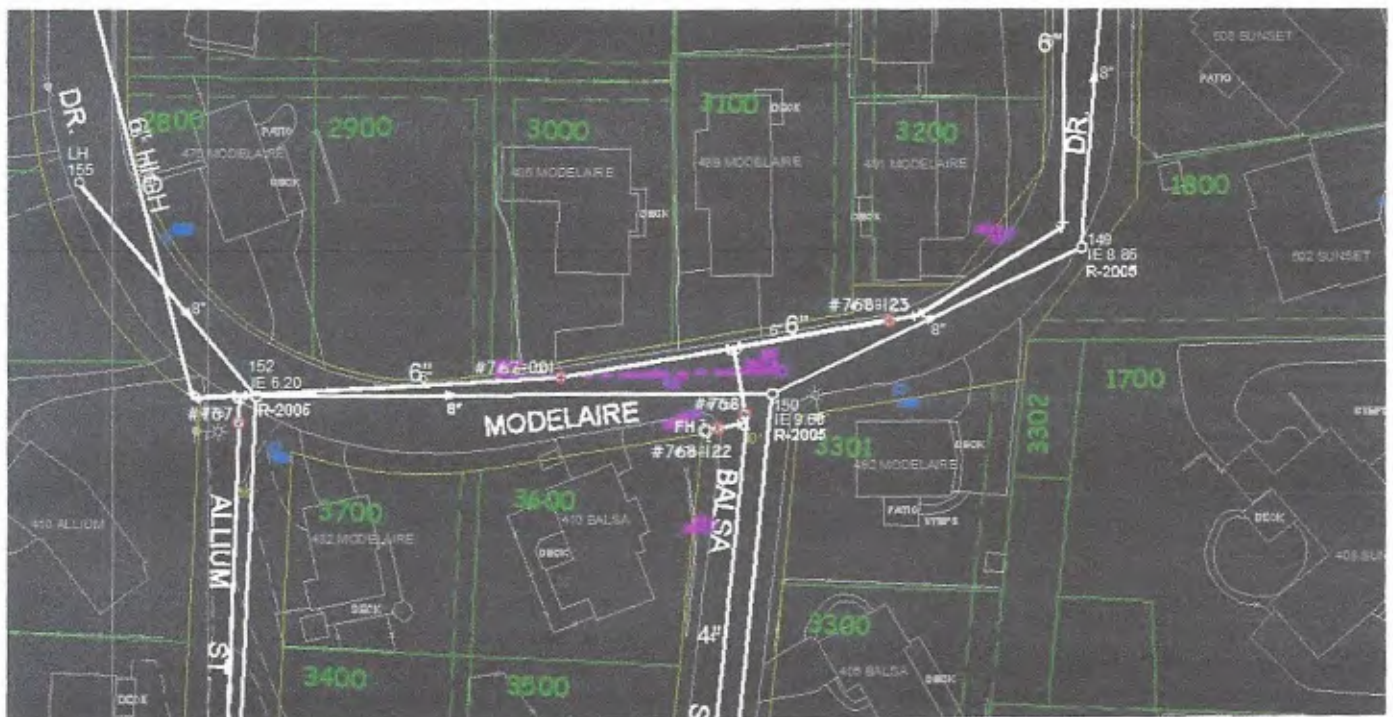
Let me know if there are any other specifications of these roadways that you are interested in that I have missed. Have a great weekend and thanks for the treats, the guys were very appreciative.

Kyle Carpenter, PE
Public Works Director
City of La Grande
Public Works
Ph: (541) 962-1325
Fax: (541) 963-4844

2 attachments

Hawthorne.jpg
150K

Modelaire.jpg
120K





attachment U2

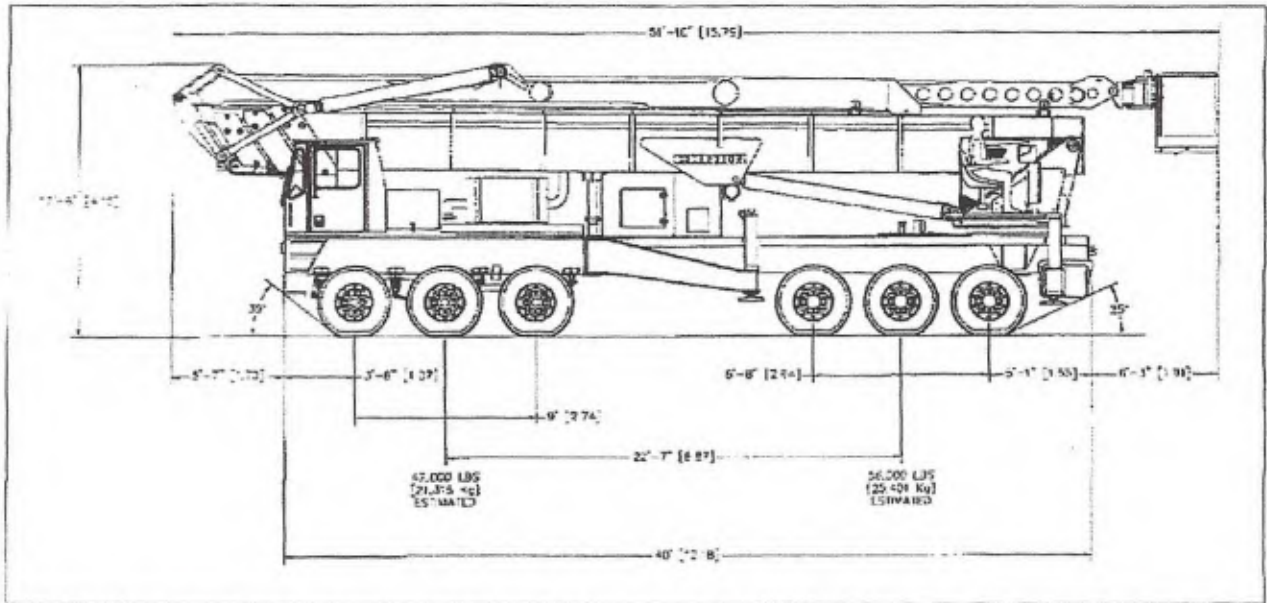


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

The following is a summary of anticipated equipment to be used for each transmission-line construction activity.

- Survey work: pickup trucks or ATVs.
- Timber removal: pickup trucks, feller bunchers, dump trucks, wood chippers.
- Road construction: pickup trucks, bulldozers, motor graders, and water trucks.
- Hole digging, installation of directly embedded structures, or foundation installation: pickup trucks, 2-ton trucks, digger derrick trucks, hole diggers, bulldozers, concrete trucks, water trucks, cranes, hydro cranes, wagon rock drills, dump trucks, and front-end loaders.
- Hauling lattice steel members, tubular poles, braces, and hardware to the structure sites: steel haul trucks, carry alls, cranes, and forklifts.
- Assembly and erection of structures: pickup trucks, 2-ton trucks, carry alls, cranes, and a heavy lift helicopter.
- Wire installation: pickups, wire reel trailers, diesel tractors, cranes, 5-ton boom trucks, splicing trucks, three drum pullers, single drum pullers, tensioner, sagging dozers, carry-alls, static wire reel trailers, bucket trucks, and a light duty helicopter.
- Final cleanup, reclamation, and restoration: pickup trucks, 2-ton trucks, bulldozers, motor graders, dump trucks, front-end loaders, hydro-seed truck, and water trucks.

The highest level of traffic will be when the wire stringing operations begin while several other operations are occurring at the same time, which will likely include ROW clearing, installing foundations, hauling steel, and assembling and erecting structures. For the station work, the highest level of traffic will be during site grading and foundation installation. For the communication station sites, the highest level of traffic will be during grading and site preparation.

Detailed estimates of trips generated by transporting Project construction equipment will be provided by the construction contractor prior to construction.

3.1.3 Traffic Related to Timber Removal

In forested areas, the Project will require removal of timber from the Project ROW and for construction and improvement of access roads. Specific timber harvest plans have not been finalized. Logs from timber clearing may be transported to nearby sawmills. Decisions regarding transportation routes for harvested timber will be made following completion of a timber harvest plan, and the number of log truck trips will be estimated when the timber harvest plan has been finalized. Logging slash will remain onsite if possible. For additional discussion regarding removal of timber in forested areas, see Exhibit K, Attachment K-2, ROW Clearing Assessment.

3.1.4 Impacts to V/C Ratios

Based on the estimated trip generation numbers in Tables 4 and 6, a maximum of approximately 1,294 daily one-way vehicle trips are expected within any one construction spread. To facilitate traffic and other analyses, the two construction spreads are divided into smaller sections based on similar construction windows and seasonal weather restrictions. Not all construction sections will have the same number of concurrent construction activities, depending on how the construction contractor sequences and executes the Project. Some sections will have fewer daily vehicle trips. For the purposes of the traffic analysis, the spreads are divided into five sections with multi-use areas that could have additive traffic impacts. The sections are assumed to have approximately equal levels of activity. The 1,294 daily one-way trips per spread divided over five sections of more concentrated traffic results in 259 daily one-

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

Upon the request of the La Grande City Council, a variety of street design standards have been reviewed and are now incorporated in the Land Development Code.

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

This classification will cover those streets that are designed to meet the standards for an expected life of twenty (20) years or more. The attached drawings shall be the minimum standard for those streets in this classification. All streets designated as Federal Aid Urban Streets (F.A.U.) shall be constructed under these design standards. Streets in this designation shall be constructed with sidewalks when at all possible in an effort to increase pedestrian safety. Collector streets are designed to withstand normal trucks of an HS 20 loading. Larger trucks are to utilize Arterial streets where at all possible. This level of development shall be the ultimate goal for all streets within the City of La Grande.

Possible means of financing available for this Class shall be methods A, B, C, D, E, F, G, and H in Section 6.6.006.

A. Advantages

1. The construction life is extended to a period above other City standards.
2. The visible aesthetics in relationship to having curbs and a blacktop surface with landscaping or concrete driveways and a sidewalk is generally appealing to the public.
3. Easy maintenance for the Public Works Department for cleaning and minor repair.
4. Storm sewer drainage is confined within the bounds of the curbs during minor flooding periods.
5. Parking is restricted to a solid barrier, that being the curb; this restricts parking in the area on the back side of the curb and confines travel to the street surface.
6. Defined areas for possible cross walks, signs, power poles, and other utilities that are restricted to the outside areas behind the curbs.
7. It allows for a wide range of financing methods and is to City standards for a ten (10) year Bancroft bonding.
8. Provides a dust free surface.

B. Disadvantages

1. The extreme high level of cost that is incurred with this type of development.

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

Streets constructed in this classification shall be constructed to the same standards as Class I Streets with the exception of the form of drainage system. These streets shall meet the standards as shown on the attached drawing. This level of construction shall be only utilized in substitution for Class I Streets when it is determined by the City Council at the recommendation of the City Engineer or Engineering Superintendent, that an adequate drainage system cannot be installed for a Class I Street.

Table 6. Construction Vehicle Trips per Day per Construction Spread

Construction Crew Type	Construction Vehicles					
	Light Construction Vehicles			Heavy Construction Vehicles		
	Number of Pickups/ Mechanic Trucks (per day)	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)	Number of Other Vehicles	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)
Substation Construction	20	2	40	5	2	10
ROW Clearing	9	4	36	5	4	20
Roads/ Pad Grading	9	4	36	9	2	18
Foundations	9	2	18	5	8	40
Tower Lacing (assembly)	27	2	54	0	0	0
Tower Setting (erection)	20	2	40	0	0	0
Wire Stringing	9	4	36	9	4	36
Restoration	3	2	6	0	0	0
Blasting	5	4	20	0	0	0
Material Delivery	20	8	160	12	2	24
Mechanic and Equipment Mgmt.	5	6	30	0	0	0
Refueling	0	0	0	5	4	20
Dust Control	0	0	0	5	4	20
Construction Inspection	5	8	40	0	0	0
Concrete Testing	5	4	20	0	0	0
Environmental Compliance	9	6	54	0	0	0
Surveyors	5	3	30	0	0	0
Totals	—	—	620	—	—	188

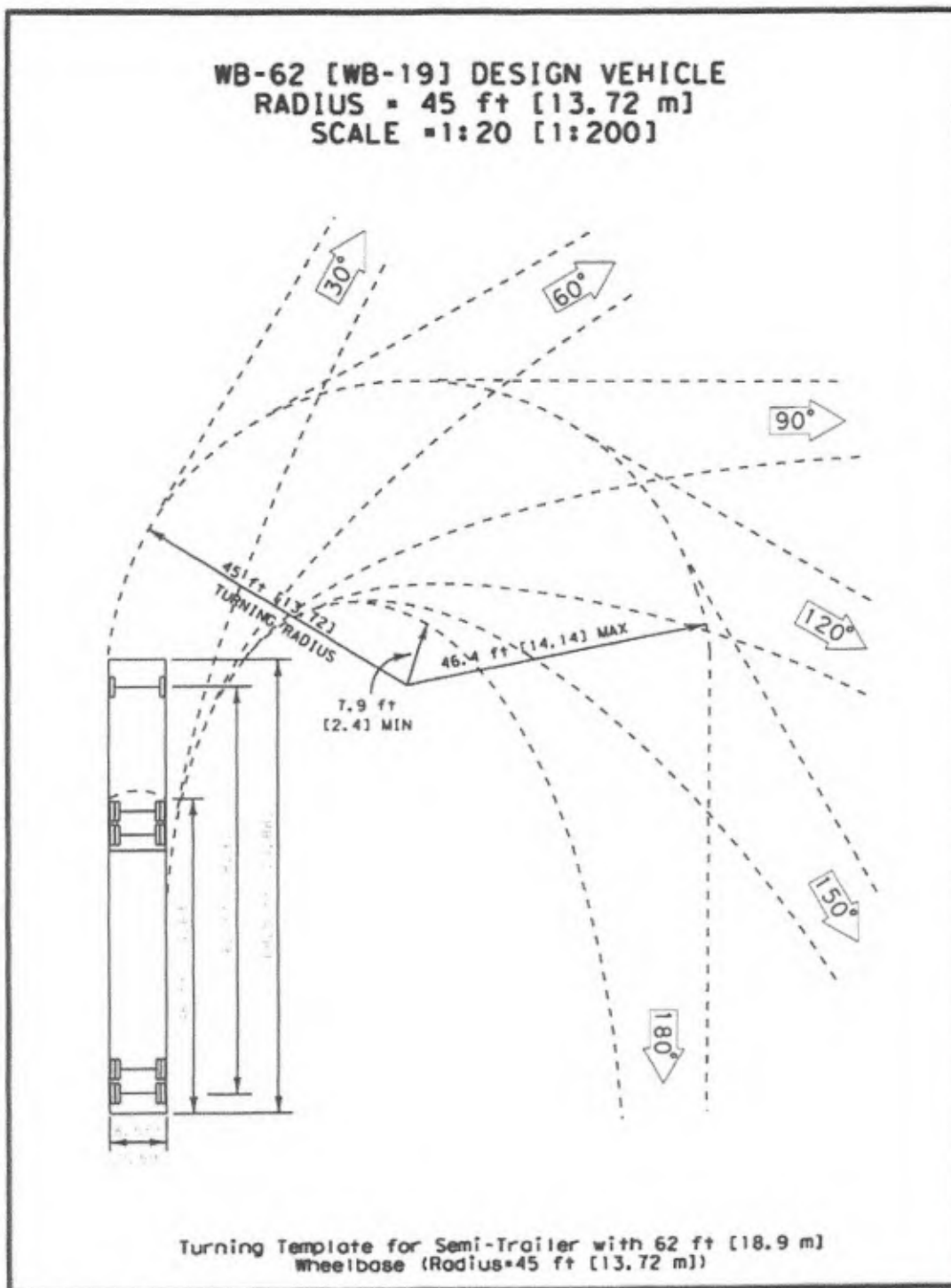
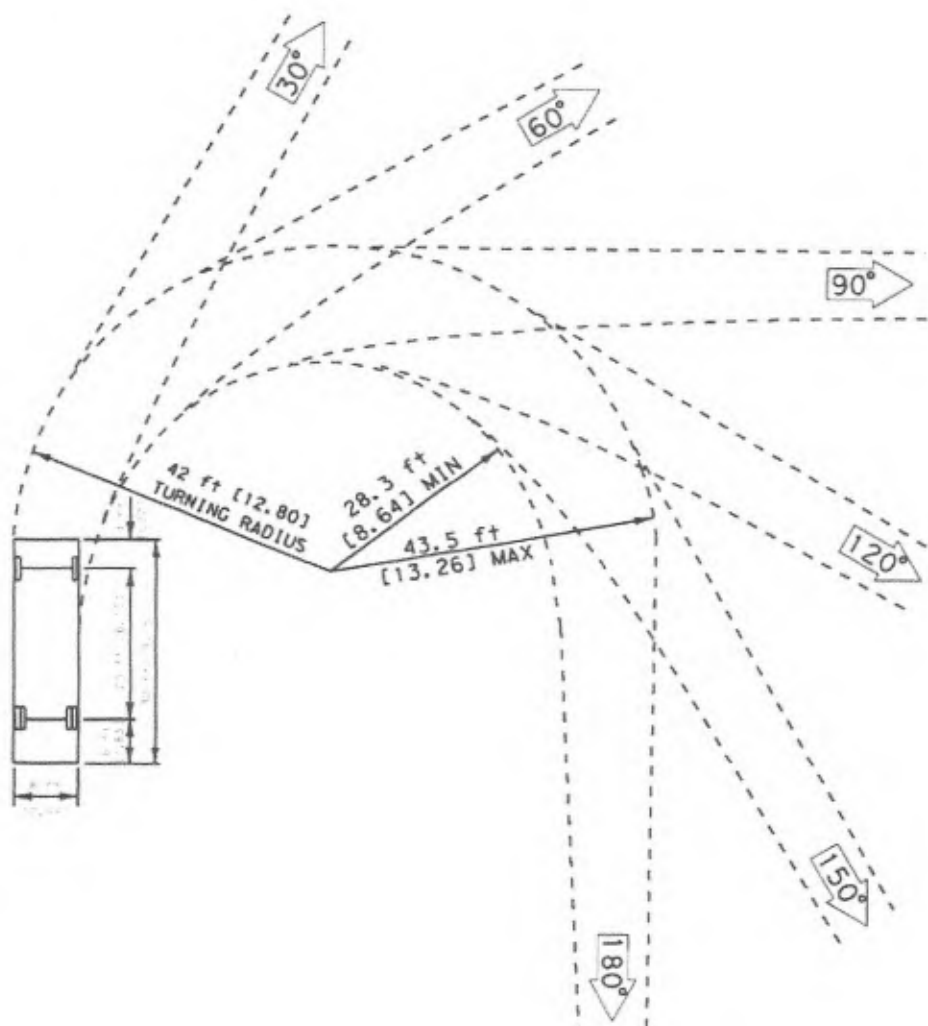


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

SINGLE UNIT (SU) TRUCK DESIGN VEHICLE
TURNING RADIUS = 42 ft [12.80 m]
SCALE = 1:20 [1:200]



Turning Template for Single Unit Trucks or Buses

Exhibit 15

**CITY OF LA GRANDE
ORDINANCE NUMBER 3077
SERIES 2009**

**AN ORDINANCE CONTROLLING VEHICULAR AND PEDESTRIAN TRAFFIC, PARADES
AND PROCESSIONS AND ISSUANCE OF PERMITS; PROVIDING PENALTIES; AND
REPEALING ORDINANCE NUMBER 2845, SERIES 1993; ALL AMENDING ORDINANCES
AND ALL OTHER ORDINANCES OR PARTS OF ORDINANCES IN CONFLICT HEREWITH;
AND DECLARING AN EFFECTIVE DATE**

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

Section 1. This Ordinance may be cited as the City of La Grande Uniform Traffic Ordinance.

Section 2. APPLICABILITY OF STATE TRAFFIC LAWS.

Oregon Revised Statutes, Chapter 153, and the Oregon Vehicle Code, ORS Chapter 801 and 822, as now constituted, are adopted by reference. Violation of an adopted provision of those chapters is an offense against the City.

Section 3. DEFINITIONS

In addition to those definitions contained in the Oregon state Motor Vehicle Code, the following words or phrases, except where the context clearly indicates a different meaning, shall mean:

a. Alley

A street or highway primarily intended to provide access to the rear or side of lots or buildings in urban areas and not intended for through vehicular traffic.

b. Bicycle

A bicycle is a vehicle that:

1. Is designed to be operated on the ground on wheels;
2. has a seat or saddle for use of the rider;
3. is designed to travel with not more than three (3) wheels in contact with the ground;
4. is propelled exclusively by human power; and,
5. has every wheel more than fourteen inches (14") in diameter or two (2) tandem wheels, either of which is more than fourteen inches (14") in diameter.

c. Bicycle Lane

That part of the highway, adjacent to the roadway, designated by official signs or markings for use by persons riding bicycles, except as otherwise specifically provided by law.

d. Bicycle Path

A public way, not part of a highway, which is designated by official signs or markings for use by persons riding bicycles, except as otherwise specifically provided by law.

e. Block

The part of one side of a street lying between the two (2) nearest cross streets.

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

The applicant shall submit an application to the City Manager or designee, showing the terminal points of the purported movement; the proposed route; the nature of the movement requested, including the weight and dimensions of the vehicle, load, machine, building, or structure to be moved; the time, date and duration of the proposed movement.

b. Special Movement Permit

A permit shall be required to move any vehicle, structure, or load on, or to access a street when, after preparation for movement, the vehicle, structure or load exceeds fourteen feet (14') in height, requires the use of guy wires, or could result in the blockage of a street. An approved application may serve as a permit, and a copy of the approved application shall be provided to the applicant.

Section 17. TRUCK ROUTES

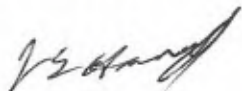
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, pounds specifically picking up deliveries or making deliveries to any business or residence located on a street that is not a truck route will be exempted if the vehicle is driven from the truck route to the destination in the shortest, most direct, and safest route.
- c. The use of Jacob brakes shall not be allowed within the city limits of La Grande, Oregon.
- d. Truck routes will be posted as follows:
 1. Walnut street north from the city limits to C Avenue;
 2. C Avenue east from Walnut Street to Gekeler Avenue;
 3. Gekeler Avenue east to the city limits;
 4. 12th street south from Gekeler Avenue to the city limits;
 5. 2nd Street south from the city limits to Adams Avenue;
 6. Monroe Avenue east from Spruce Street to Highway 82;
 7. Jackson Avenue east from Spruce Street, and
 8. Spruce Street south from the city limits to Monroe.

Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement officer may cause the vehicle to be towed and stored at the owner's expense. The owner shall be liable for the costs of towing and storing, notwithstanding that the vehicle was parked by another or that the vehicle was initially parked in a safe manner but subsequently became an obstruction or hazard.

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE



PRINTED NAME

James E. Howell II

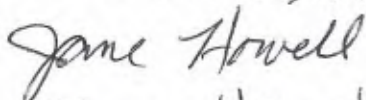
ADDRESS

482 Modelaire Dr

EMAIL

j.howell12@frontier.com

SIGNATURE



PRINTED NAME

Jane Howell

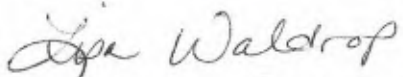
ADDRESS

482 Modelaire DR

EMAIL

d.janehowell@gmail.com

SIGNATURE



PRINTED NAME

Lisa Waldrop

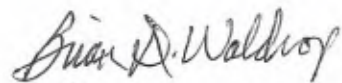
ADDRESS

475 Modelaire Dr.

EMAIL

ldjw62@gmail.com

SIGNATURE



PRINTED NAME

BRIAN D. WALDROP

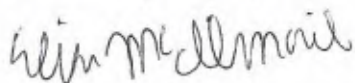
ADDRESS

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bdwaldrop58@gmail.com

SIGNATURE



PRINTED NAME

EUSE McILMAIL

ADDRESS

476 MODELAIRe DR.

EMAIL

mcilmail154@hotmail.com


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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

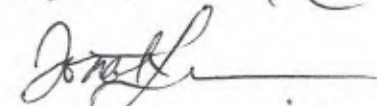

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL. Com

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL


Jonah Lindeman
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jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

Marie Skinner
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marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

Blake Bars
Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

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SIGNATURE

D. Dale Mammen

PRINTED NAME

D. Dale Mammen

ADDRESS

405 BRISA, La Grande, OR

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SIGNATURE

Jim Kreider

PRINTED NAME

Jim Kreider

ADDRESS

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SIGNATURE

Judie Arritola

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Judie Arritola

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EMAIL

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SIGNATURE

Pasco Arritola

PRINTED NAME

Pasco Arritola

ADDRESS

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EMAIL

PJTOLA@CHARTER.NET

SIGNATURE

John Barutz

PRINTED NAME


John Barutz


ADDRESS


484 Hawthorne LG, OR 97850


EMAIL


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SIGNATURE 
PRINTED NAME Andrea Gulzow
ADDRESS 486 Hawthorne DR, LA Grande
EMAIL foreverfamily33@aol.com

SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 471 Modelaire Dr. L.G.
EMAIL

SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE: 

PRINTED NAME Shawn K. Mangum

ADDRESS 2905 E. M. Ave,

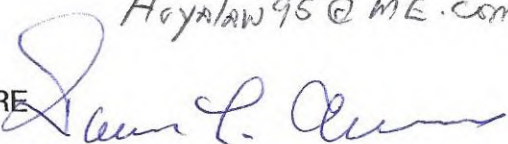
EMAIL Hoyalan95@ME.com

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



CONNIE L. ALLEN 541-9637720
410 BALSA STREET LAGRANDE, OREGON 97858
N/A

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

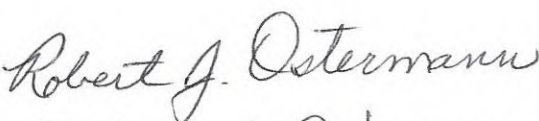

Linda Snyder
491 Modelaire Dr

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Robert J. Ostermann
495 Modelaire Dr. La Grande, OR 97850

SIGNATURE

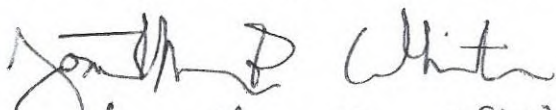
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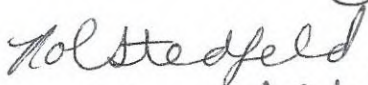
ADDRESS


EMAIL

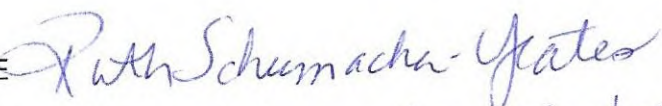

Robin J. Ostermann
495 Modelaire Dr La Grande, OR 97850

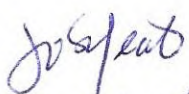
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

SIGNATURE 
PRINTED NAME Robin Stedfeld
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EMAIL rstedfeld@yahoo.com

SIGNATURE 
PRINTED NAME Rita Allen
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EMAIL

SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
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EMAIL ruthschumacheryeates@gmail.com

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 

PRINTED NAME LOIS BARRY

ADDRESS P.O. Box 566, La Grande, OR 97850

EMAIL loisbarry31@gmail.com

SIGNATURE 

PRINTED NAME CATHY WEBB

ADDRESS 1708 CEDAR ST. LAGRANDE, OR 97850

EMAIL thunkski@gmail.com

SIGNATURE 

PRINTED NAME Jack L. Martin

ADDRESS 1412 Gilcrest Dr. LaGrande

EMAIL Buff Martin 27 @GMail.com

SIGNATURE 

PRINTED NAME GERALDINE BRASETH-PALMER

ADDRESS 1602 GILDEREST DRIVE LA GRANDE, Ore 97850

EMAIL 


SIGNATURE 


PRINTED NAME Jean BAPH

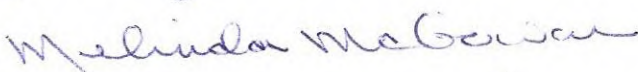
ADDRESS 1509 MADISON AVE LaGrande, OR 97850


EMAIL Jbaph19@gmail.com


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SIGNATURE 
PRINTED NAME Damon Sexton
ADDRESS 401 Balsa St La Grande, OR 97850
EMAIL Sexton.damon@gmail.com

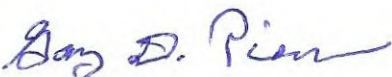
SIGNATURE 
PRINTED NAME Cory Sexton
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SIGNATURE 
PRINTED NAME Melinda McGowan
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SIGNATURE 
PRINTED NAME Laura Elly Hudson
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I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 

PRINTED NAME Gary D. Pierson

ADDRESS 489 Modelaire Drive, La Grande OR 97850

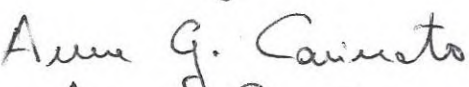
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SIGNATURE 

PRINTED NAME LYNN WHEELER DUNCAN

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SIGNATURE 

PRINTED NAME Anne G. Cavinato

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SIGNATURE 

PRINTED NAME JOE HORST

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EMAIL joehorst@comi.com

SIGNATURE 

PRINTED NAME ANGELA Sherer

ADDRESS 91 W. Hawthorne Dr. LaGrande, OR 97850

EMAIL asherer@frontier.com

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SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
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SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
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SIGNATURE *Bert R. Frewing*
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SIGNATURE *Lindsey McCullough*
PRINTED NAME Lindsey McCullough
ADDRESS 406 Balsa St., La Grande, OR 97850
EMAIL lindz_mm91@hotmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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SIGNATURE *Merle E. Comfort*
PRINTED NAME MERLE E. COMFORT
ADDRESS 209 SCORPIO DRIVE LA GRANDE OR 97850
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SIGNATURE *Robin L. Maille*
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SIGNATURE *Bruce C Kevan*
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SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
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SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
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EMAIL

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SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
ADDRESS *406 4th St. LaGrande, PR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:28 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order 5/23/2019
Attachments: Scan 2019-8-15 17.14.06.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter sign by me and 46 other residents of La Grande expressing our concerns regarding the B2H Project and requesting that EFSC Deny the Site Certificate.

I have also sent a bound copy of this material by US Postal Service.

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, Oregon. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that that will impact the west hills and the area below.

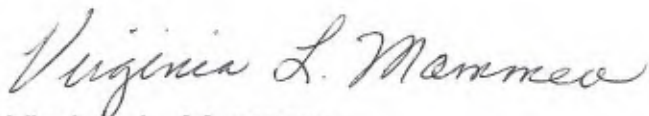
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140dBA at the blast location or over 90 dBA within 500 feet." This sounds oh so "don't worry about it, it will be OK just over in a split second." Living in this area off Modelaire Drive, I don't find this at all comforting. And the fact that this will be overseen by properly licensed personnel and all of the necessary authorizations doesn't help anything either.

The area in question, which for such inordinate construction is extremely close to many residents, has been my home for over 50 years and during

related medical problems and exhibit various reactions to loud noises.¹⁰
These children also live in the neighborhoods to be affected by the noise so they would be impacted coming and going to school, at home and also while at school. To impose the constant possibility of loud noises is cruel, disrespectful and totally unacceptable. ¹¹

For a project like this involving blasting and heavy machinery noise so close to homes, schools, and medical facilities impacting hundreds of peoples' daily lives, the day to day agitation, wondering what is coming next, fear and being on constant alert are not just addressed by some type of mitigation but must be addressed by a route that is much less impactful to peoples' safety, sanity, and health.

Sincerely,

A handwritten signature in cursive script that reads "Virginia L. Mammen".

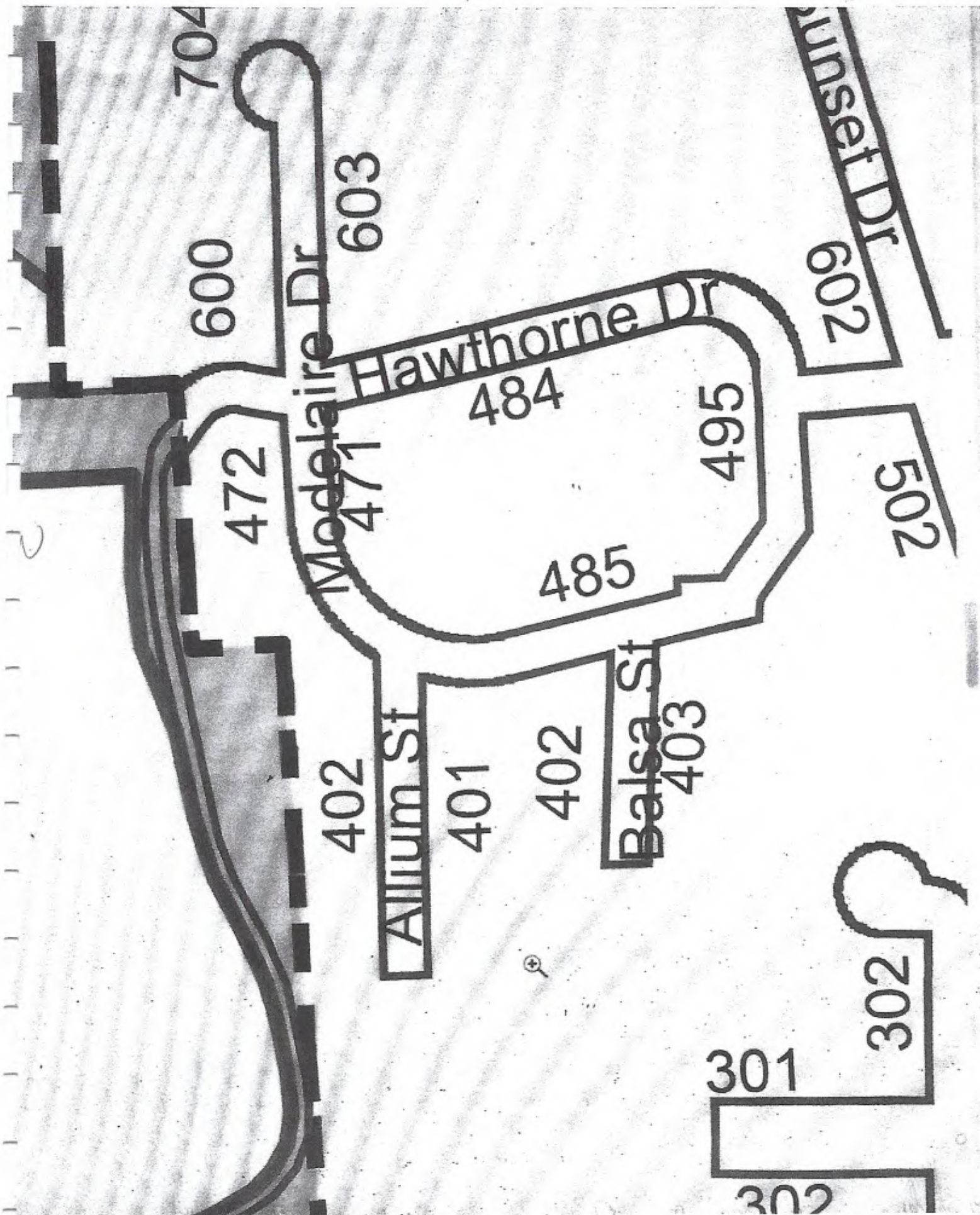
Virginia L. Mammen

405 Balsa

La Grande, Oregon 97850

gmammen@eoni.com

N



3.3 Predicted Noise Levels

OAR 345-021-0010(1)(x)(A): Predicted noise levels resulting from construction and operation of the proposed facility.

3.3.1 Construction Noise

3.3.1.1 Predicted Construction Noise Levels

Project construction will occur sequentially, moving along the length of the Project route, or in other areas such as near access roads, structure sites, conductor pulling sites, and staging and maintenance areas. Overhead transmission line construction is typically completed in the following stages, but various construction activities may overlap, with multiple construction crews operating simultaneously:

- Site access and preparation
- Installation of structure foundations
- Erecting of support structures
- Stringing of conductors, shield wire, and fiber-optic ground wire

The following subsections discuss certain construction activities that will periodically generate audible noise, including blasting and rock breaking, implosive devices used during conductor stringing, helicopter operations, and vehicle traffic.

Blasting and Rock Breaking

Blasting is a short-duration event as compared to rock removal methods, such as using track rig drills, rock breakers, jackhammers, rotary percussion drills, core barrels, or rotary rock drills. Modern blasting techniques include the electronically controlled ignition of multiple small-explosive charges in an area of rock that are delayed fractions of second, resulting in a total event duration that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140 dBA at the blast location or over 90 dBA within 500 feet.

Lattice tower foundations for the Project typically will be installed using drilled shafts or piers; however, if hard rock is encountered within the planned drilling depth, blasting may be required to loosen or fracture the rock to reach the required depth to install the structure foundations. Final blasting locations will not be identified until an investigative geotechnical survey of the analysis area is conducted during the detailed design.

The contracted blasting specialist will prepare a blasting plan that demonstrate compliance with applicable state and local blasting regulations, including the use of properly licensed personnel and the acquisition of necessary authorizations. The Framework Blasting Plan is set forth in Exhibit G, Attachment G-5.

Implosive Devices

An implosive conductor splice consists of a split-second detonation with sound and flash. Implosive splicing activities are anticipated to be limited to daytime hours. A blasting plan will be developed by an individual certified and licensed to perform the work. The plan will communicate all safety and technical requirements including, but not limited to, delineation of the controlled access zone and distance away from residences.

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety. Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



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Department of Environmental Quality

Chapter 340

Division 35

NOISE CONTROL REGULATIONS

340-035-0035**Noise Control Regulations for Industry and Commerce****(1) Standards and Regulations:**

(a) **Existing Noise Sources.** No person owning or controlling an existing industrial or commercial noise source shall cause or permit the operation of that noise source if the statistical noise levels generated by that source and measured at an appropriate measurement point, specified in subsection (3)(b) of this rule, exceed the levels specified in Table 7, except as otherwise provided in these rules. [Table not included. See ED. NOTE.]

(b) New Noise Sources:

(A) **New Sources Located on Previously Used Sites.** No person owning or controlling a new industrial or commercial noise source located on a previously used industrial or commercial site shall cause or permit the operation of that noise source if the statistical noise levels generated by that new source and measured at an appropriate measurement point, specified in subsection (3)(b) of this rule, exceed the levels specified in Table 8, except as otherwise provided in these rules. For noise levels generated by a wind energy facility including wind turbines of any size and any associated equipment or machinery, subparagraph (1)(b)(B)(iii) applies. [Table not included. See ED. NOTE.]

(B) New Sources Located on Previously Unused Site:

(i) No person owning or controlling a new industrial or commercial noise source located on a previously unused industrial or commercial site shall cause or permit the operation of that noise source if the noise levels generated or indirectly caused by that noise source increase the ambient statistical noise levels, L10 or L50, by more than 10 dBA in any one hour, or exceed the levels specified in Table 8, as measured at an appropriate measurement point, as specified in subsection (3)(b) of this rule, except as specified in subparagraph (1)(b)(B)(iii).

(ii) The ambient statistical noise level of a new industrial or commercial noise source on a previously unused industrial or commercial site shall include all noises generated or indirectly caused by or attributable to that source including all of its related activities. Sources exempted from the requirements of section (1) of this rule, which are identified in subsections (5)(b)-(f), (j), and (k) of this rule, shall not be excluded from this ambient measurement.

(iii) For noise levels generated or caused by a wind energy facility:

(I) The increase in ambient statistical noise levels is based on an assumed background L50 ambient noise level of 26 dBA or the actual ambient background level. The person owning the wind energy facility may conduct measurements to determine the actual ambient L10 and L50 background level.

(II) The "actual ambient background level" is the measured noise level at the appropriate measurement point as specified in subsection (3)(b) of this rule using generally accepted noise engineering measurement practices. Background noise measurements shall be obtained at the appropriate measurement point, synchronized with wind speed measurements of hub height conditions at the nearest wind turbine location. "Actual ambient background level" does not include noise generated or caused by the wind energy facility.

(III) The noise levels from a wind energy facility may increase the ambient statistical noise levels L10 and L50 by more than 10 dBA (but not above the limits specified in Table 8), if the person who owns the noise sensitive property executes a legally effective easement or real covenant that benefits the property on which the wind energy facility is located. The easement or covenant must authorize the wind energy facility to increase the ambient statistical noise levels, L10 or L50 on the sensitive property by more than 10 dBA at the appropriate measurement point.

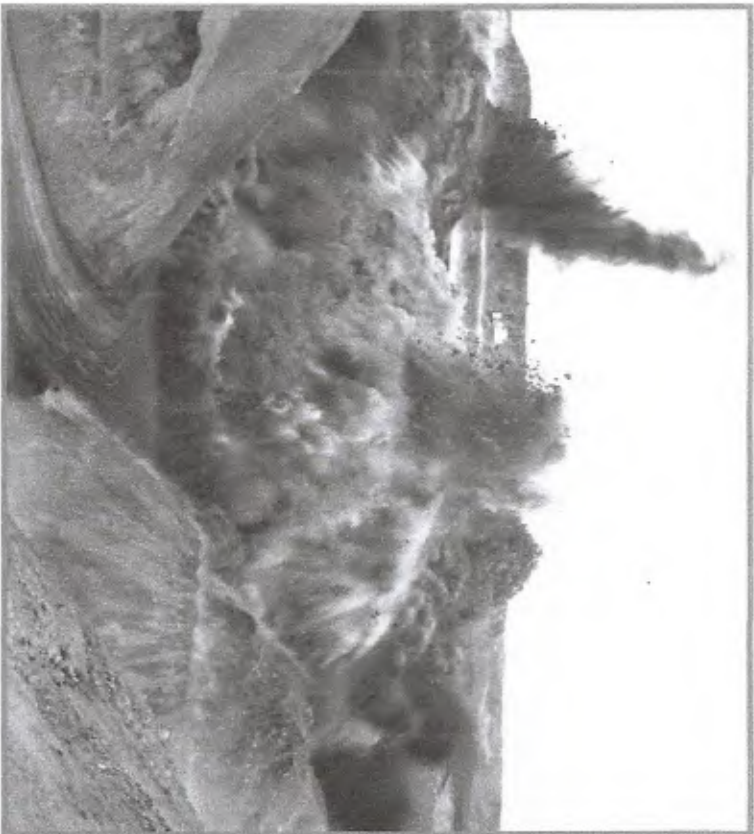
- (2) Compliance. Upon written notification from the Director, the owner or controller of an industrial or commercial noise source operating in violation of the adopted rules shall submit a compliance schedule acceptable to the Department. The schedule will set forth the dates, terms, and conditions by which the person responsible for the noise source shall comply with the adopted rules.
- (3) Measurement:
- (a) Sound measurements procedures shall conform to those procedures which are adopted by the Commission and set forth in Sound Measurement Procedures Manual (NPCS-1), or to such other procedures as are approved in writing by the Department;
- (b) Unless otherwise specified, the appropriate measurement point shall be that point on the noise sensitive property, described below, which is further from the noise source:
- (A) 25 feet (7.6 meters) toward the noise source from that point on the noise sensitive building nearest the noise source;
- (B) That point on the noise sensitive property line nearest the noise source.
- (4) Monitoring and Reporting:
- (a) Upon written notification from the Department, persons owning or controlling an industrial or commercial noise source shall monitor and record the statistical noise levels and operating times of equipment, facilities, operations, and activities, and shall submit such data to the Department in the form and on the schedule requested by the Department. Procedures for such measurements shall conform to those procedures which are adopted by the Commission and set forth in Sound Measurement Procedures Manual (NPCS-1);
- (b) Nothing in this rule shall preclude the Department from conducting separate or additional noise tests and measurements. Therefore, when requested by the Department, the owner or operator of an industrial or commercial noise source shall provide the following:
- (A) Access to the site;
- (B) Reasonable facilities, where available, including but not limited to, electric power and ladders adequate to perform the testing;
- (C) Cooperation in the reasonable operation, manipulation, or shutdown of various equipment or operations as needed to ascertain the source of sound and measure its emission.
- (5) Exemptions: Except as otherwise provided in subparagraph (1)(b)(B)(ii) of this rule, the rules in section (1) of this rule shall not apply to:
- (a) Emergency equipment not operated on a regular or scheduled basis;
- (b) Warning devices not operating continuously for more than 5 minutes;
- (c) Sounds created by the tires or motor used to propel any road vehicle complying with the noise standards for road vehicles;
- (d) Sounds resulting from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad only to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576; but this exemption does not apply to any standard, control, license, regulation, or restriction necessitated by special local conditions which is approved by the Administrator of the EPA after consultation with the Secretary of Transportation pursuant to procedures set forth in Section 17(c)(2) of the Act;
- (e) Sounds created by bells, chimes, or carillons;
- (f) Sounds not electronically amplified which are created by or generated at sporting, amusement, and entertainment events, except those sounds which are regulated under other noise standards. An event is a noteworthy happening and does not include informal, frequent, or ongoing activities such as, but not limited to, those which normally occur at bowling alleys or amusement parks operating in one location for a significant period of time;
- (g) Sounds that originate on construction sites.
- (h) Sounds created in construction or maintenance of capital equipment;
- (i) Sounds created by lawn care maintenance and snow removal equipment;
- (j) Sounds generated by the operation of aircraft and subject to pre-emptive federal regulation. This exception does not apply to aircraft engine testing, activity conducted at the airport that is not directly related to flight operations, and any other activity not pre-emptively regulated by the federal government or controlled under OAR 340-035-0045;

Controlling the Adverse Effects of Blasting

This module addresses the control of offsite impacts that result from blasting, namely:

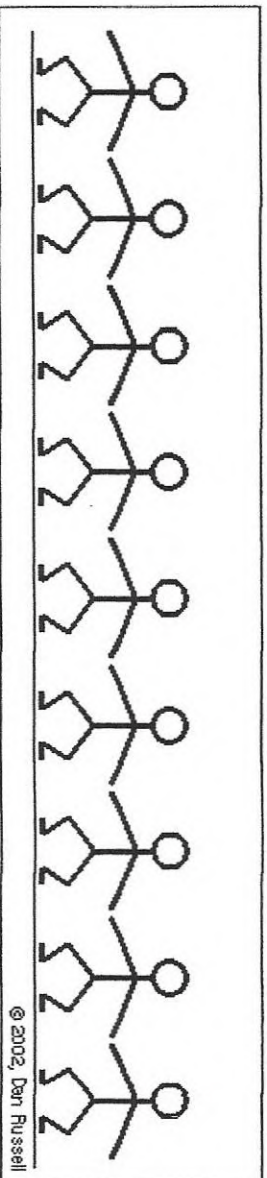
- vibrations,
- airblast, and
- flyrock.

Much of the information in the module is derived from the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The performance standards apply to all surface coal mines. Similar standards have been adopted on some State and local levels and applied to non-coal blasting operations such as quarrying and construction.



Part I: Ground Vibrations, Airblast, and Flyrock

Explosive energy is used to break rock. However, the use of this energy is not 100-percent efficient. Some of the energy escapes into the atmosphere to generate **airblast or air vibrations**. Some of the energy also leaves the blast site through the surface soil and bedrock in the form of **ground vibrations**.



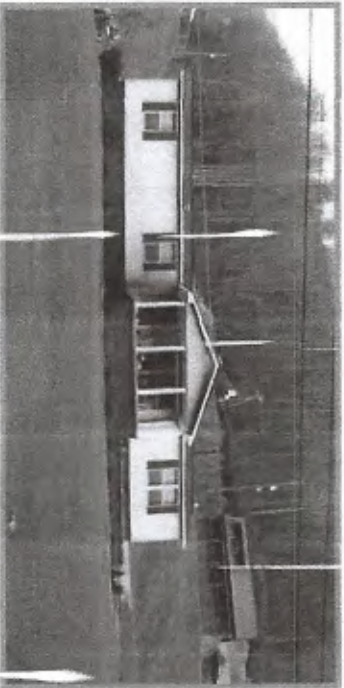
Both air and ground vibrations create waves that disturb the material in which they travel. When these waves encounter a structure, they cause it to shake. Ground vibrations enter the house through the basement and airblast enters the house through the walls and roof.

Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior noise" will alarm and startle people living in the house.

Flyrock is debris ejected from the blast site that is traveling through the air or along the ground. Flyrock the single most dangerous adverse effect that can cause property damage and personal injury or death.

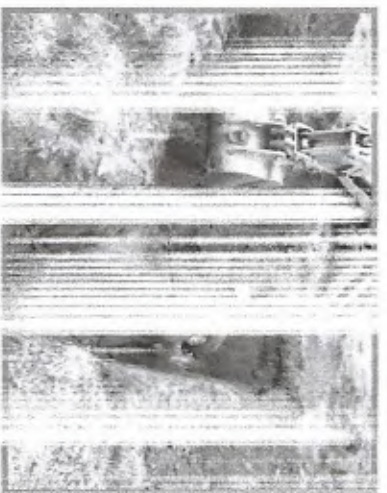
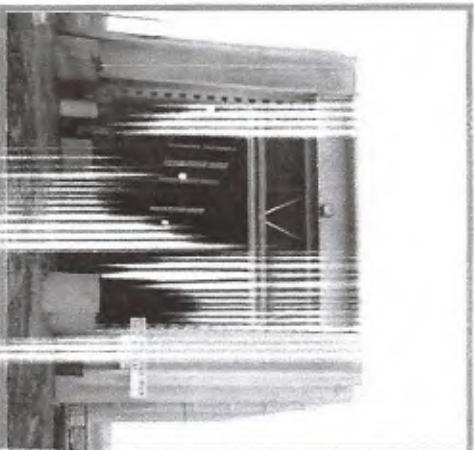
Blasting Impacts on Structures

Both above-ground and below-ground structures are susceptible to vibration impacts. Structures can include onsite mine offices and buildings, as well as offsite residences, schools, churches, power-transmission lines, and buried pipelines. Some of these structures may include historic or cultural features sensitive to even low levels of vibrations.



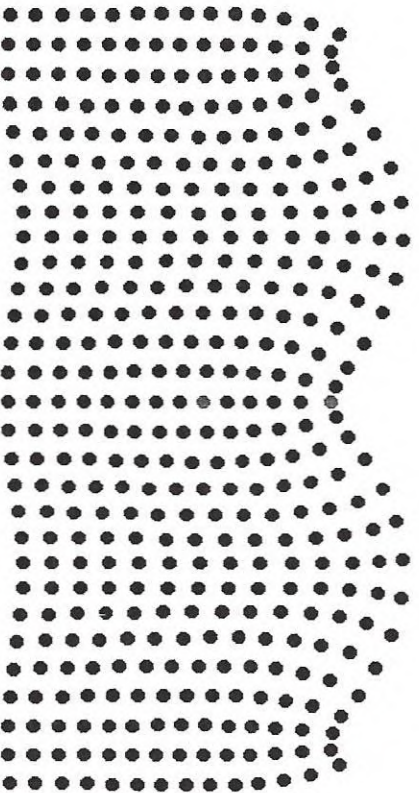
It is important to understand:

1. the causes of ground vibrations and airblast, and
2. what practices can be followed to control and minimize the adverse effects



Ground Vibrations

Ground vibrations propagate away from a blast site as Rayleigh (or surface) waves. These waves form a disturbance in the ground that displaces particles of soil or rock as they pass by. Particle motions are quite complicated. At the ground surface (free boundary), measured particle motions have the greatest displacements, and displacements decrease with depth (see the illustration below). At a depth of between 20 to 50 feet below ground surface, particle displacements are barely detectable. Structures that are well coupled to the ground tend to move with this motion; structures buried in the ground are less affected by surface motions.



©1999, Daniel A. Russell

Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

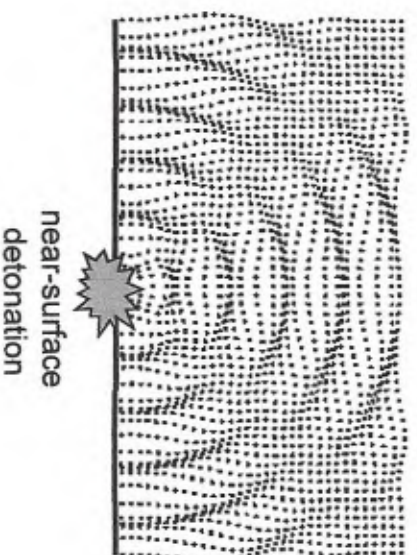
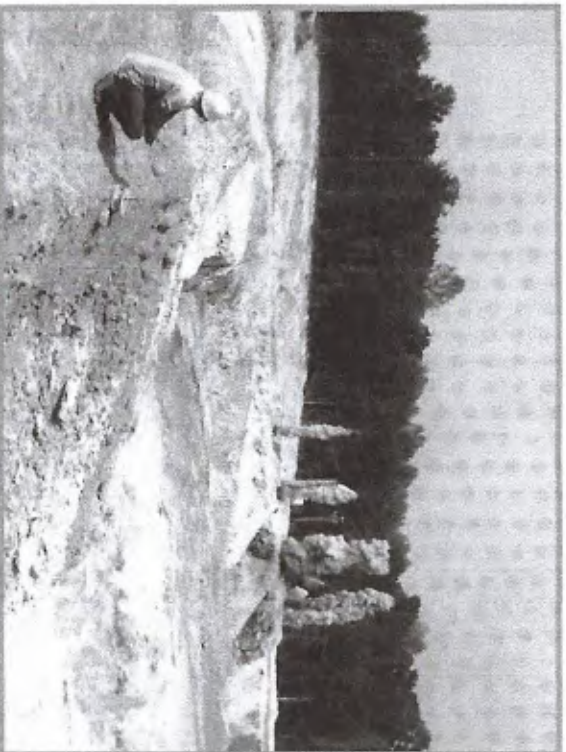
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

2 Airblast is measured as a pressure in pounds per square
5 inch (psi) and is often reported in terms of **decibels (dB)**.

Airblast is a pressure wave that that may be audible or in-audible. Elevated airblast levels are generated when explosive energy in the form gases escape from the detonating blast holes. Energy escapes either through the top stemming or through fractures in the rock along the face or at the ground surface.

Exhibit 7



Airblast radiates outward from the blast site in all directions and can travel long distances. Sound waves travel much slower (1,100 ft/s) than ground vibrations (about 5,000 – 20,000 ft/s). Hence, airblast arrives at offsite structures later than do ground vibrations.

Both ground vibrations and airblast cause structures to shake structures. Occupants in structures that are located far from a blast may experience shaking from vibration and airblast as two separate, closely spaced events. This can be particularly bothersome, as it prolongs the duration of structure shaking and leads the property owner to think that two separate blasts occurred.

Structure Response

As ground and air vibrations reach a structure, each will cause it to shake. Structure response is dependant on the vibration characteristics (frequency and amplitude) and structure type.

Ground Vibrations enter the house through the basement. This is like shaking the bottom of a flag pole. Movement at the top of the pole depends on how (frequency) and how hard (amplitude) the bottom of the pole is shaken. If shaken at just the right pace, or at the pole's natural frequency, the top will move significantly compared to the bottom. Motion at the top is amplified from the bottom motion.

All blast damage studies have measured incoming ground vibrations at the ground surface. The observed structure amplifications were typically between 1 to 4 times the ground vibration. Structure response below ground level is the same or less than the incoming vibrations

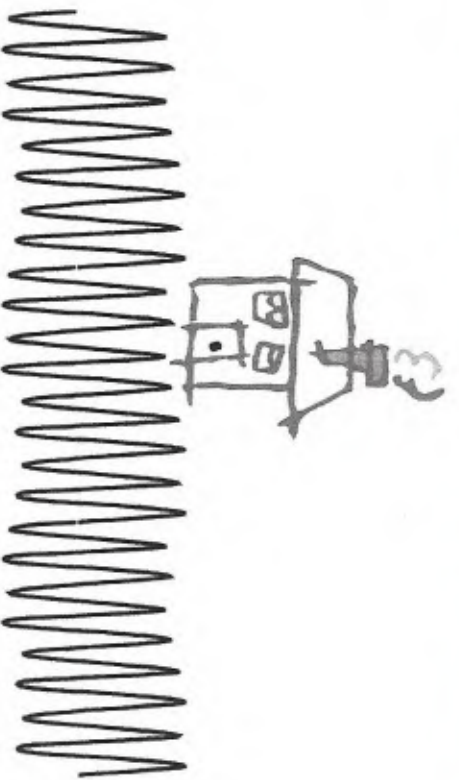
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

Due to the different arrival times of ground and air vibrations, occupants may feel two distinct impacts on the house.



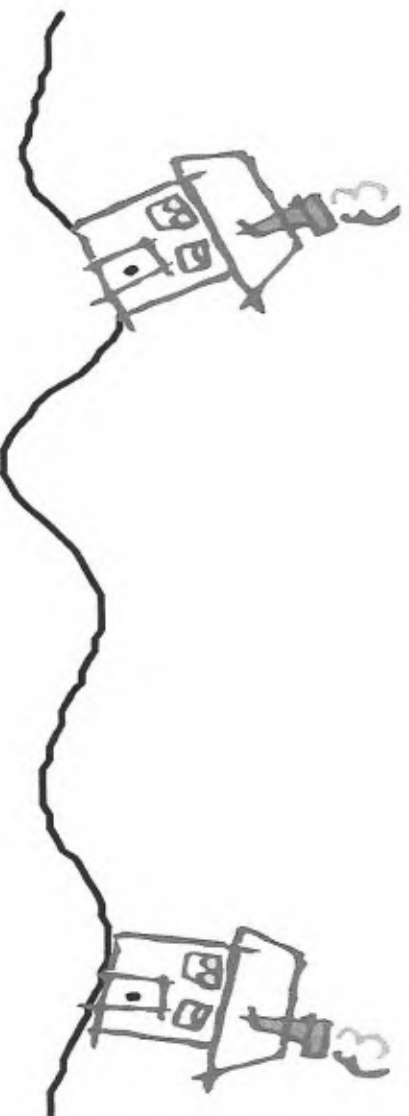
Ground Vibration Structure Response

Exhibit 59



High frequencies do not promote structure shaking. The length of a single high-frequency wave cycle is short as compared with the dimension of a structure. A structure does not significantly respond to high frequencies.

On the other hand, low-frequency wave cycles are long as compared with the dimensions of structures. Accordingly, low frequencies tend to efficiently couple energy into structures and to promote higher-amplitude, long-duration shaking.



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Harvard Men's Health Watch

A noisy problem

People often become more sensitive to noise as they age, which can affect their mental and physical health.

Published: March, 2019



Image: © Juanmonino/Getty Images

Are you more sensitive to noises than you used to be? Do certain sounds now feel too loud and jarring? Don't worry; it's actually quite normal.

Age-related hearing loss is common among older adults and affects about two-thirds of men in their 70s and 85% of men ages 80 and older. Although it's not clear why, this can also make people hypersensitive to sounds that they used to tolerate easily, which in turn can affect their well-being.

"Exposure to noises from crowds, traffic, and other everyday sounds can become harder to tolerate and increase stress levels, leading to anxiety and a reduction in overall quality of life," says Dr. Stephanie Tompkins, an audiologist with Harvard-affiliated Massachusetts Eye and Ear. "As your sensitivity to noises increases, this can lead to greater isolation, too, as you may try to avoid potentially noisy places and situations."

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Quiet in the Hospital: How Noise...

Quiet in the Hospital: How Noise Reduction Helps Patients Heal

on June 7, 2018 (<https://medcenterblog.uvmhealth.org/innovations/hospital-noise-reduction/>) in Innovation
(<https://medcenterblog.uvmhealth.org/category/innovations/>) by UVM Medical Center
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Noise. It is present in almost every aspect of our lives. From the traffic in the streets, to the fan that provides us white noise in the background to sleep, noise exists. Unfortunately, like stress, too much of it can have a negative impact on a person's health and rest. Some sounds we do like to hear, such as birds chirping, signaling spring in Vermont, but what about sounds in a hospital?

Many of us get admitted to hospitals when we are too sick to take care of ourselves at home. We expect exceptional care from physicians and nurses and, of course, to rest in order to help our bodies heal. We understand that some noises in a hospital are necessary for care; however, others simply aren't.

The Sounds of a Hospital

Many organizations, including the UVM Medical Center, have high tech equipment, which greatly assists in the delivery of care to our patients, but can also be noisy. Sometimes, healthcare providers are the source of the noise as we interact and communicate with our patients and other health team members.

Another factor is visits from families and friends during visiting hours. It is difficult when one's roommate is trying to rest in the opposite bed. Yet, we need to be cognizant of noise in patient care areas as sounds can be magnified and misinterpreted, increasing agitation and even confusion for some patients.

We become accustomed to the noise; our patients are not.

The Research on Noise, Quiet, and Healing

Research has shown that noise plays a negative role in healing and that decreasing noise in patient care areas aids in healing processes and helps facilitate speedier recoveries for patients. Patients are able to heal, sleep better and recover more quickly when able to rest. A quieter environment can also help decrease burnout for hospital staff.

Studies show that patients are more likely to develop negative side effects from a noisy hospital, such as sleep disturbances, elevated blood pressure and heart rate, and increased use of pain medications.

Noise can also increase annoyance levels for staff. One study indicated noise, such as talking inside and outside patient rooms, is the most common source of noise as well as visitors' voices, TVs, and behaviors of other patients.

Research concluded that best practices to eliminate noise from talking included staff education about noise reduction, public indicators such as sound monitors, a quiet time protocol, and lower cost environmental fixes, such as fixing noisy doors and squeaky wheels. Lastly, by introducing scripting with routine monitoring, patients' perception of quietness increased and the perception of noise decreased.

How We Address Noise at the UVM Medical Center

We introduced the "Culture of Quiet" Organizational initiative. The Nursing Professional Governance Patient and Family Experience Global council continued this work. After convening a small task force of nurses and assessing current quiet strategies, we introduced the following tactics:

- Many hospital units have designated 'quiet hours' with automatically dimming of lights at quiet hour intervals.
- Signage is visible in most patient care areas to help keep patients, family, and visitors aware. Throughout the hospital, you will see signs with a relaxing pair of Adirondack chairs and the sun setting with details on when a unit has quiet hours.
- Many semi-private rooms have windows in doors, so doors can be closed allowing for patient rest.
- We offer headphones for TVs and earplugs to help minimize sounds.
- In-patient kits contain a sleeping mask and other comfort items that can be provided at time of admission. Each kit contains a card and explains, 'the best healing occurs in a quiet environment.'
- New education material is available for staff, patients and visitors-just ask to review the next time visiting.
- Some units offer white noise machines, others have this built in.
- Noisy equipment such as wheels and doors can be tagged and replaced.
- Our facility and distribution staff have changed their cleaning and supply delivery schedules to accommodate patient care.
- Healthcare teams within the hospital are focusing efforts to cluster patient care to minimize interruptions to provide restful moments.

How you can help us.

We ask patients and visitors to hold us accountable when sounds are too loud. We want our community to alert us when noise levels are high and we will do what we can to minimize sound. In turn, we ask that all members of the healthcare team, patients, family, and friends be aware to keep voices soft, cell phones on vibrate, and hold each other accountable for these are the times of the day when our patients take pause to rest and positively impact their healing.

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Dangerous Decibels: Hospital Noise More Than a Nuisance

By Diane Sparacino, Staff Writer

Imagine a world where hospitals have become so noisy that the annoyance has topped hospital complaints, even more than for the tasteless, Jell-O-laden hospital food (Deardorff, 2011). If you're a nurse, you know that we're already there – with noise levels reaching nearly that of a chainsaw (Garcia, 2012). In fact, for more than five decades, hospital noise has seen a steady rise (ScienceDaily, 2005).

But it wasn't always that way. At one time, hospitals were virtually noise-free like libraries – respected spaces, preserved as quiet zones. The culture was such that a loud visitor might be silenced by a nurse's purposeful glare or sharply delivered "Shhh!" As early as 1859, the importance of maintaining a quiet environment for patients was a topic for discussion. In Florence Nightingale's book, "Notes on Nursing," she described needless noise as "the most cruel absence of care" (Deardorff, 2011).

Fast forward to 1995, when the World Health Organization (WHO) outlined its hospital noise guidelines, suggesting that patient room sound levels not exceed 35 decibels (dB). Yet since 1960, the average daytime hospital noise levels around the world have steadily risen to more than double the



acceptable level (from 57 to 72 dB), with nighttime levels increasing from 42 to 60 dB. WHO found that the issue was not only pervasive, but high noise levels remained fairly consistent across the board, despite the type of hospital (ScienceDaily, 2005).

Researchers at Johns Hopkins University began to look into the noise problem in 2003. They maintained that excessive noise not only hindered the ability for patients to rest, but raised the risk for medical errors. Other studies blamed hospital noise for a possible increase in healing time and a contributing factor in stress-related burnout among healthcare workers (ScienceDaily, 2005).

Technology is, of course, partly to blame. State-of-the-art machines, banks of useful alarms, respirators, generators, powerful ventilation systems and intercoms all add up to a lot of unwanted racket. When human voices are added to the mix, (i.e., staff members being forced to speak loudly over the steady din of medical equipment), it's anything but a restful environment. For the recovering patient in need of sleep, that can be a real issue (Deardorff, 2011).

Contributing to the problem, experts say, are the materials used in hospitals. Because they must be easily sanitized, surfaces cannot be porous where they could harbor disease-causing organisms. Rather than using noise-muffling materials like carpet, acoustic tiles and other soft surfaces, hospitals have traditionally been outfitted using smooth, hard surfaces – especially in patient rooms. Good for cleanliness – not so great for dampening sounds, which tend to bounce around the typical hospital (Deardorff, 2011).

Which brings us to the most recent research, published January 2012 in the *Archives of Internal Medicine*. In the report, Jordan Yoder, BSE, from the Pritzker School of Medicine, University of Chicago, and his colleagues associated elevated noise levels with “clinically significant sleep loss among hospitalized patients,” perhaps causing a delay in their recovery time (Garcia, 2012). During the 155-day study period, researchers examined hospital sound levels. The numbers far exceeded (WHO) recommendations for average hospital-room noise levels, with the peak noise at an average 80.3 dB – nearly as loud as a chainsaw or electric sander (85 dB), and well over the recommended maximum of 40 dB. And while nights tended to be quieter, they were still noisier than recommended allowances, with “a mean maximum sound level of 69.7 dB” (Garcia, 2012).

Perhaps most interestingly, the researchers broke down the sources of noise into categories: “Staff conversation (65%), roommates (54%), alarms (42%), intercoms (39%), and pagers (38%) were the most common sources of noise disruptive reported by patients” (Garcia, 2012). “Despite the importance of sleep for recovery, hospital noise may put patients at risk for sleep loss and its associated negative effects,” they wrote. In addition, researchers found that the intensive care and surgical wards had some work to do in dampening noise levels, with ICU peaking at 67 dB and 42 dB for surgical areas. Both far exceeded WHO’s 30 dB patient room recommendation (Garcia, 2012).

Besides patient sleep deprivation, which itself can lead to a multitude of health problems including high blood sugar, high blood pressure and fatigue, studies have reported that elevated noise levels can increase heart and respiratory rates, blood pressure and cortisol levels. Recovery room noise causes patients to request more pain medication, and preterm infants “are at increased risk for hearing loss, abnormal brain and sensory development, and speech and language problems when exposed to prolonged and excessive noise” (Deardorff, 2011).

There is still more research to be done, of course, but Yoder and his colleagues had good news, as well; much of the hospital noise they identified is modifiable, suggesting that hospitals can take steps to successfully create a quieter environment for both patients and healthcare providers (Garcia, 2012).

Around the country, "quiet campaigns" have been launched by hospitals in an attempt to dampen nighttime noise. Besides dimming lights and asking staff to keep their voices down at night, they are working to eliminate overhead paging systems, replace wall and/or floor coverings – even the clang of metal trashcans. Northwestern's Prentice Women's Hospital in Chicago was built with noise reduction in mind, replacing the idea of centralized nursing stations with the advent of smaller, multiple stations (Deardorff, 2011)

Billed as "one of the nation's largest hospital construction projects," Palomar Medical Center in North San Diego County is a state-of-the-art facility that has been designed "to encourage quietness," according to Tina Pope, Palomar Health Service Excellence Manager. Slated to open its doors this August, the hospital will feature a new nursing call system to route calls directly to staff and help eliminate the need for overhead paging, de-centralized nursing stations and clear sig lines, allowing staff to check on patients without having to leave unit doors open. With measures already in place including "Quiet Hospital" badges on staff and posters at the entrance of every unit, a "Quiet at Night" campaign (9 p.m. – 6 a.m.), and a "Quiet Champions" program that encourages staff to report noise problems, Palomar is one of a growing number of hospitals working toward a new era of quiet.

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Noises Are Truly Horrible For People Who Have PTSD

20 Mar '2018 [Sound](#)

Noise is a really big issue for PTSD survivors: people who have mental health problems because of their traumas. How are they connected?

Almost everybody has experienced a trauma. But some traumas are more scarring than others and can even result in long-lasting mental disorders like **PTSD**, which can have an extreme impact on someone's life. It's a disorder that can develop in the brain after a horrifying experience, like war or a car crash.

Symptoms

The symptoms of PTSD are, to say the least, not pleasant. They range from nightmares about the traumatic events, disturbing thoughts and feelings, anxiety, trying to avoid anything that has something to do with the traumatic event, and an increase in the fight-or-flight response.

Around ten percent of the population suffers from PTSD, according to data from **NCBI**, a part of the US National Library of Medicine. And, remarkably enough, that percentage is the same for people who suffer from tinnitus (the sound of a constant beep in your ears). The NCBI clearly sees a link between the two.

PTSD survivors also suffer from the Exaggerated Startle Syndrome, with anxiety and actions in an extreme and irrational way too loud noises and bangs. And then there are the sounds that remind them of the sounds during the traumatic events, which can trigger memories of the



Fear

PTSD can also cause a general fear of sounds: phonophobia, or a fear of some specific sounds: misophonia. Survivors of the disorder also are generally much more sensitive to sounds and perceive them as much louder than other people would.

All of this makes the life of people with PTSD very hard. If you think you are suffering from this, consult your doctor. Really, please do it. For yourself, and for the ones you love.

Do you have PTSD and would you like to tell your experiences to us? We are always very open and interested to hear what you have to say. And again: if you haven't done it yet, visit your doctor, please. Thank you!

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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

In everyday life, cognitive tasks are often performed in the presence of task-irrelevant environmental noise. Accordingly, numerous studies on noise effects on performance have been conducted since the middle of the 20th century (for reviews see Hellbrück and Liebl, 2007; Szalma and Hancock, 2011), showing that—depending on characteristics of sounds and tasks—noise of low to moderate intensity may in fact evoke substantial impairments in performance.

Most of these studies were conducted with adults. The present review, however, will focus on studies including children. Children are especially vulnerable to harmful effects of environmental noise, as cognitive functions are less automatized and thus more prone to disruption. We will report findings concerning effects of acute noise on performance in concurrent auditory and non-auditory tasks, as well as effects of chronic noise on children's cognitive development.

Effects of acute noise on children's performance in auditory tasks

Psychoacoustic studies have consistently shown that children's speech perception is more impaired than adults' by unfavorable listening conditions. The ability to recognize speech under conditions of noise or noise combined with reverberation improves until the teenage years (Johnson, 2000; Wightman and Kistler, 2005; Talarico et al., 2007; Neuman et al., 2010). With stationary noise makers, signal-to-noise ratios (SNRs) have to be 5–7 dB higher for young children when compared to adults in order to achieve comparable levels of identification of speech or nonspeech signals, with adult-like performance reached at about 6 years of age (Schneider et al., 1989; Fallon et al., 2000; Werner, 2007). However, with maskers that vary over time, i.e., with trial-by-trial variation of the maskers' spectral composition (Oh et al., 2001; Hall et al., 2005; Leibold and Neff, 2007) or with fluctuating maskers such as single-talker speech (Wightman and Kistler, 2005), adult-like performance is usually not reached before the age of 10 years. Furthermore, children are less able than adults to make use of spectro-temporal and spatial cues for separation of signal and noise (Wightman et al., 2003; Hall et al., 2005). These findings demonstrate that children are especially prone to *informational* masking, i.e., masking that goes beyond energetic masking predicted by filter models of the auditory periphery.

Studies identified a range of linguistic and cognitive factors to be responsible for children's difficulties with speech perception in noise: concerning the former, children are less able than adults to use stored phonological knowledge to reconstruct degraded speech input. This holds for the level of individual phonemes, as children's phoneme categories are less well specified than adults' (Hazan and Barrett, 2000), but also for the lexical level since children's phonological word representations are more holistic and less segmented into phoneme units. Therefore the probability of successfully matching incomplete speech input with stored long-term representations is reduced (Nittrouer, 1996; Metsala, 1997; Mayo et al., 2003). In addition, young children are less able than older children and adults to make use of contextual cues to reconstruct noise-masked words presented in sentential context (Elliott, 1979). Concerning attention, children's immature auditory selective attention skills contribute to their difficulties with speech-in-noise perception. Children's susceptibility to informational masking has been attributed to deficits in focusing attention on auditory channels centered on signal frequencies, while ignoring nonsignal channels (Wightman and Kistler, 2005). Behavioral and ERP measures from dichotic listening paradigms provide evidence that auditory selective attention improves throughout entire childhood (Doyle, 1973; Pearson and Lane, 1991; Coch et al., 2005; Wightman et al., 2010; Gomes et al., 2012).

Owing to the mediating role of linguistic competence and selective attention, children with language or attention disorders are still more impaired than normally developing children by noise in speech perception tasks (Geffner et al., 1996; Ziegler et al., 2005, 2009). A stronger noise effect is also evident for children tested in their second language when compared to native children (Crandell and Smaldino,

Autism & Anxiety: Parents seek help for extreme reaction to loud noise

September 5, 2018

Our 12-year-old son has autism, mild intellectual disability and anxiety attacks so severe that we end up in the emergency room. Loud noises are the worst – for example the school fire alarm, thunderstorms, a balloon popping, fireworks. Any help would be greatly appreciated.



This week's "Got Questions?" answer is by Judy Reaven, a clinical psychologist and associate professor of psychiatry and pediatrics at the University of Colorado School of Medicine and Children's Hospital Colorado, in Denver. Dr. Reaven's conducted research on the effectiveness of cognitive-behavioral therapy for anxiety in adolescents with autism, with the support of an [Autism Speaks research grant](#).

Editor's note: The following information is not meant to diagnose or treat and should not take the place of personal consultation, as appropriate, with a qualified healthcare professional and/or behavioral therapist.

Thanks for the great question. It certainly sounds like your family is experiencing a very difficult situation. Anxiety symptoms and reactions are very common in individuals with autism spectrum disorder (ASD). They can interfere with functioning across home, community and school settings.

Although your son's reaction sounds more severe than most, many people with autism struggle with a range of fears, phobias and worries. These can range from a debilitating fear of, say, spiders or the dark to chronic anxiety about making mistakes or being late.

Fortunately, recent research suggests that anxiety in children and adults who have autism is quite treatable. Often, these individuals are helped by the same or similar strategies that work well in treating anxiety in the general population.

These approaches include cognitive behavior therapy, or CBT. Cognitive-behavioral approaches are well-established, evidenced-based treatments that have become the gold standard of psychosocial treatments for anxiety. [My own research](#) and that of my colleagues has demonstrated the helpfulness of modifying cognitive-behavioral approaches to address the special needs of those who have autism.

Where to begin?

You describe a number of fears that may be related to sensory sensitivities. I recommend that you begin by consulting an occupational therapist who can assess whether your son's extreme sensitivities to noises are part of a broader sensory processing disorder. If this is the case, and if your son's fears are exclusively triggered by sensory stimuli, then his symptoms may be best addressed by a sensory-focused intervention. Many occupational therapists who specialize in autism receive special training in this area.

It's common for children with ASD and anxiety to become extremely frightened in response to sensory stimuli. Perhaps – like many individuals with autism – your son also has difficulty telling you what's scaring him. Instead, he may show his fear with extreme avoidance of a situation.

For example, he might refuse to go to school after a fire drill. He might become fearful of birthday parties after being frightened by a balloon that popped unexpectedly. Other signs of extreme distress can include yelling, crying, clinging and general agitation. Because your son may have difficulty communicating, it's important to observe his behavior for these signs of distress. This can help you determine what's triggering his fears.

Avoidance versus learning to cope

Many parents go to great pains to protect their children by avoiding agitating situations. This approach is sometimes appropriate and even necessary. However, it denies individuals the opportunity to learn how to manage anxiety-provoking situations on their own.

By helping your son learn to manage his fear, you can prepare him for an unpredictable world so that he can participate in it to the maximum extent possible.

Given the severity of your son's anxiety symptoms, I suggest that you seek professional support in addition to the strategies offered here. Families whose children have milder symptoms of anxiety can try these strategies on their own – seeking professional help if symptoms worsen.

Tackling one fear at a time

I suggest making a list of your child's major fears and worries. Try to rank order them from mild to severe. To encourage success, I'd start with a mild-to-moderate fear before taking on his extreme reaction to loud noises.

Key components of a cognitive behavioral approach include introducing coping strategies such as deep breathing and "helpful thoughts" that can help a person manage fearful reactions.

For example, you can teach your son to take deep slow breaths to help manage his body's physical anxiety reactions.

"Helpful thoughts" are statements that your son can say to himself when faced with a situation that makes him anxious. For example, you can coach to your son to say, "This is a loud noise. I don't like it, but I can handle it."

To help your son to learn these strategies, I suggest you model taking deep breaths while repeating a "helpful thought" out loud.

Graded exposure

The most important step is to help your son face his fears a little at a time. We call this "graded exposure." For example, explain to your son that the two of you are going to listen to a recording of thunder. The first time, you might play the recording at a soft volume, then gradually increase the volume over time as he demonstrates increased comfort with the sounds.

Or you might try watching a video of a balloon pop – perhaps with the volume off the first time. Then he can watch a real balloon pop while standing some distance away. Over time, he can move closer and closer to the balloon.

After such exercises, you can present him with small rewards for being brave and "facing fears." Remember that even a small act of bravery – such as listening to a recording of thunder for 10 seconds – represents an important step toward handling fears. It deserves to be acknowledged.

Although graded exposure may seem counterintuitive, [research](#) indicates that this strategy is the single most effective strategy for getting over a particular fear.

I wish you and your son the very best. Please let us know how you're doing with an email to GotQuestions@autismspeaks.org.

60
Shares

Additional Resources & Tools

EXPERT OPINION

[Help for Child with Autism & Recurring Behavioral Crises: Part 2](#)

EXPERT OPINION

[Parents Seek Help for Son with Autism and Recurring Behavioral Crises](#)

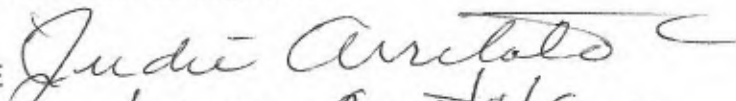


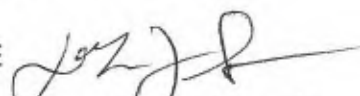
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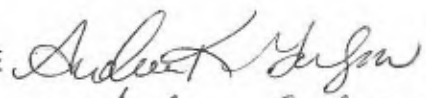
EXPERT OPINION

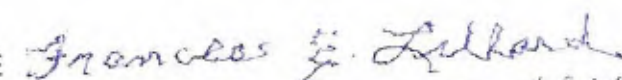
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE 
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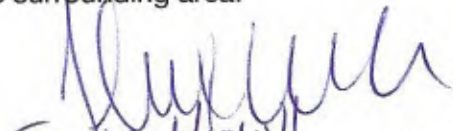
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M. Jeannette Smith

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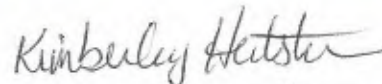
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KIMBERLEY HETSTUMAN

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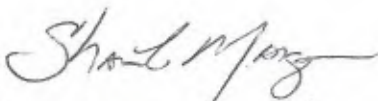
kimheitstuman@hotmail.com

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Shawn K. Mangum

2409 E. M. Ave.

Hoya/mw95@me. com

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Rita Allen

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Linda M. Snyder

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EMAIL

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SIGNATURE *Robin J. Ostermann*

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Gerald Darwin Juniper

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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

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PRINTED NAME
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EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

From: lois barry <loisbarry31@gmail.com>
Sent: Thursday, August 22, 2019 9:15 AM
To: B2H DPOComments * ODOE
Subject: Noise at Morgan Lake Park

August 22, 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

I live on the Morgan Lake Road. Morgan Lake Park is about two miles from my home. At least once a week for the past 40 years, almost daily in the summer, I have walked the east side trail at Morgan Lake. I know the park well, and I especially cherish the absolute silence of this secluded natural area. During the past 40 years, the tranquility of the park has not changed.

I have studied DPO Attachment X-4, pp. 3/5 & 4/5. From my understanding of this attachment, every location in Union County which would be crossed by the B2H Morgan Lake Alternate Route was monitored with the same noise sensitive receptor (NSR) at milepost 11. This single NSR would provide exactly -- and unrealistically -- the same reading for the Husky Truck Stop, where heavy freight trucks from adjacent I-84 stop for gas and park for the night with diesel engines rumbling, and Morgan Lake Park, several miles to the west at the top of a relatively isolated two lane county road.

At Morgan Lake Park, the camp host closes the gate each night at 10:00 to ensure quiet. Visitors often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, generators and shooting are not allowed, and no motorized craft are permitted on the lake. Even when the campground is full, it's possible to picnic, fish, hike or camp while enjoying the absolute silence of the surroundings. The Morgan Lake Park Recreational and Development Plan even cautions against loud voices that might disturb park visitors: <https://drive.google.com/open?id=1eDDbGDjINZT8jiEvY-l6MRUsLgtq28cI>

2. Breaching the public Peace. No person in Morgan Lake Park shall engage in abusive, insulting ... language or engage in any disorderly conduct or behavior tending to breach the public peace. Park visitors shall conduct themselves in a quiet and peaceful manner consistent with the natural atmosphere in which the park is set. (25/33)

I am profoundly concerned that the applicant has failed to include noise monitoring at Morgan Lake Park campground, a noise sensitive property within ½ mile of the development as required by OAR-340-035-0015(38). Noise Sensitive Property is “*property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries.*” This is a significant failure in the application.

Morgan Lake Park, an overnight campground, is unquestionably a place where people expect to sleep, and furthermore, to sleep undisturbed. Eight towers supporting buzzing, popping, snapping transmission lines will

border the campground; the closest being .32 and .38 miles; the furthest one mile. I see no opportunity for adequate mitigation in this case.

Division 22

GENERAL STANDARDS FOR SITING FACILITIES

Energy Facility Siting Council - Chapter 345

345-022-0100

Recreation

(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order. The Council shall consider the following factors in judging the importance of a recreational opportunity:

(a) Any special designation or management of the location:

See the Morgan Lake Recreational Use and Development Plan (above), and ASC p. 145 (T-4-46): Baseline condition: “... A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users.”

(b) The degree of demand:

From the City of La Grande’s current web site: *Morgan Lake: Atop a mountain just a few minutes’ driving time from the heart of the city, Morgan Lake offers a quiet, motor-free respite from daily cares, with camping, fishing and hiking opportunities. ... Morgan Lake is located just a few miles outside of La Grande and provides the citizens of Union County an inexpensive, easily accessible area for a broad range of outdoor recreational activities, including fishing, camping and nature hikes.*

City records show that in summer, an average of 200 vehicles use the Morgan Lake Road daily. Camping has become so popular that new campsites were added in 2017 (now total of 12) and the overnight limit decreased from 7 nights to 3 nights. Campers are often turned away.

Popular annual XTerra competitions and fishing derbies, as well as “music on the lake” are welcome activities at the lake.

(c) Outstanding or unusual qualities:

c) A free 204 acre park with two natural lakes, located in a natural setting at the top of the hills within a 10-15 minute drive of 13,000 city residents is definitely unusual. Special fishing and camping facilities are provided for handicapped visitors. Because it is often 10 degrees cooler than the town below, it is a welcome respite from summer heat.

(d) Availability or rareness:

See (c) above, and *Morgan Lake Park is an important opportunity primarily because of its unique designation status as a city park, rareness, and special qualities per OAR 345-021-0010(1)(t)(A) Attachment T-3, Table T-3-1 (p. T-13).* The exceptional natural features of the lake are addressed in another comment.

(e) Irreplaceability or irretrievability of the opportunity.

Applicant rates Morgan Lake Park as “*somewhat irreplaceable*,” a curious designation. “Irreplaceable” is an absolute: synonyms are “unique, unrepeatable, incomparable, unparalleled, priceless, invaluable.” Irreplaceability, like pregnancy, is either/or, not “somewhat.” There is no question that Morgan Lake Park is irreplaceable.

All of the information listed above clearly indicates that Morgan Lake Park is an “important recreational opportunity.” Nevertheless, applicant concludes that “impact on recreation” of permanent noise pollution

caused by multiple towers supporting buzzing, popping, snapping transmission lines, some within .3 miles of Morgan Lake Park's overnight camping area, will be "less than significant."

Commission should not allow applicant to leap to spurious self-serving conclusions when the preponderance of evidence indicates the contrary.

When organized opposition in the city of La Grande made applicant's proposed Mill Creek Route seem untenable, applicant offered the city of La Grande \$100,000 mitigation if they would support the Morgan Lake Alternate Route. At a La Grande City Council meeting, the Park Department Director, Stu Spence, was asked what he could use that money for. He could only suggest "perhaps an additional restroom or more porta potties." Clearly this is a park that does not need mitigation for development, quite the contrary. It should be protected from intrusions. Development, as the Morgan Lake Recreational Use and Development Plan indicates, should be minimal.

Division 22

GENERAL STANDARDS FOR SITING FACILITIES

Energy Facility Siting Council - Chapter 345

(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order.(R-1)

Mitigation for an industrial intrusion into the silence of a natural park setting is not possible. To preserve this rare and beautiful natural recreational opportunity, it is essential that EFSC deny site approval of the Morgan Lake Alternate Route. This alternate route was not carefully analyzed, as I have demonstrated in another comment (this date). Unsupported conclusions were presented without complete and credible data.

Documentation of the Morgan Lake Alternate Route is a cursory effort, hastily proposed as a back up in case the Mill Creek Route -- which poses many additional serious problems as well, including geologic and fire hazards; unacceptable impacts on local residences, the Oregon Trail, and natural resources among many others - was not approved.

The Commission should not be constrained by the false choice of applicant's two chosen routes. EFSC denial of these negligibly evaluated and inadequately documented routes will not prevent applicant from meeting the "needs" of their proposed project. In the unlikely event that construction of the B2H is ever approved, the BLM Environmentally Preferred Route would avoid virtually all of the impacts and necessary mitigations of the Mill Creek and Morgan Lake routes.

I urge the Commission to deny both of applicant's routes until, at a minimum, a Supplementary Environmental Impact Study (SEIS) of applicant's proposed and alternate routes has been completed.

Lois Barry
loisbarry31@gmail.com
PO Box 566
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ESTERSON Sarah * ODOE

From: lois barry <loisbarry31@gmail.com>
Sent: Thursday, August 22, 2019 3:43 PM
To: B2H DPOComments * ODOE
Subject: Comment on B2H Application

August 22, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project
9/28/2018; Draft Proposed Order 5/23/2019

To: Chairmen Beyeler and Members of the Council

I and many others have commented on Idaho Power's application for the Boardman to Hemingway transmission line, identifying many of the consequential aspects of the ASC and DPO, realizing that additional time and resources would have allowed us to further investigate more topics of concern.

It's evident that much of this "public comment" opportunity is window dressing appearing to fulfill the letter of the law, but certainly not the spirit of active public participation. Applicant's initial efforts to overwhelm rural county planning offices with a deadline of 30 days to respond to 240 lbs. of documentation (lacking both indices and pagination) should say it all.

With limited time and resources local citizens, concerned with protecting our environment, heritage and lifestyle from massive disruption by an Idaho Corporation, have done our best to inform and involve our neighbors while reading, researching and writing responses to the ASC and DPO. EFSC's requirement to cite relevant rules, standards and regulations as essential to validating Comments is daunting to the average citizen and discourages public response. Surely EFSC staff has adequate experience to determine whether a citizen's comments are valid?

One major concern is that the DPO, a summary of the ASC, accepts applicant's conclusions without essential analysis. As it is:

- 1) the DPO identifies an area that might be impacted by the proposed route,
- 2) provides a flurry of citations referring to the process of analysis and the possible degree of impact,
- 3)
- 4) usually followed by applicant's conclusion of "no significant impact" or

5) proposed mitigation which would result in a conclusion of “no significant impact.”

This process is missing 3) in which applicant should be required to provide credible statistical or visual documentation to support each and every conclusion. “Just because it’s written down, doesn’t mean it’s true.” Without the missing component of step 3 the entire application process is a sham. Step 3 is the essential point at which applicant must prove the validity of their conclusions.

Conclusions based on inadequate monitoring, invalid assumptions, omissions and misrepresentations are not acceptable. This practice is so frequent that it seems applicant has reason to believe only a perfunctory effort is necessary because EFSC route approval is assured. The Council must make Idaho Power prove their assertions and support their conclusions. As a part of evaluating route applications, ODOE has a responsibility to the citizens of Oregon to “protect their environment and public safety.” That does not involve automatic acquiescence to every project before it.

In the ASC and DPO we have identified among many other problems:

- visual impact analysis without photo-simulations
- noise monitoring without appropriately located sensors
- archeological analysis without on-the-ground surveys
- geological analysis omitting known slide and fault areas
- meaningless maps without landmarks or streets labeled
- inadequate notice to individuals whose properties will be affected
- excessive reliance on small public service agencies to fight fire
- exaggerated expense & worst-case scenarios used to avoid mitigation
- failure to evaluate impacts on protected areas
- excessive reliance on mitigating problems after approval is granted.

As a part of this process, the basic question “Who benefits?” must be answered. This B2H transmission line that will cross five counties will have no off-ramps. No additional power source will be supplied. Will the B2H benefit the communities it will cross? Not at all.

Numerous Oregon regulations cited in the ASC contain this phrase: *to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact.* The “significant adverse impacts” of the B2H as we all have outlined them would be massive, destructive, and potentially dangerous.

Considering that the literal “need” for the B2H -- proposed more than 10 years ago to avoid an assumed power shortage to Idaho -- has evaporated year by year to the point of invisibility, this application should not even be under consideration.

Idaho Power’s ostensible “need” is being sustained by the corporation’s enduring greed. It’s understandable that a guaranteed profit of \$80 million is worth the paperwork to them, but it defies understanding that ODOE would even consider approving a transmission line requiring a 300 mile clearcut across five Oregon counties with all the attendant negative impacts on order to profit an Idaho Corporation.

I urge the Commission to deny this application for a site certificate until each comment submitted and sent to the Commission by August 22 has been thoroughly analyzed, and Idaho Power has provided credible evidence to support each of its conclusions. They say “No significant impact.” I say “Prove it!”

Lois Barry
PO Box 566

La Grande, OR 97850



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory)

Peter Barry

Mailing Address (mandatory)

P.O. Bx 566
LaGrande, OREGON

Phone Number (optional) ()

Email Address (optional)

Today's Date: 6-20-19

Do you wish to make oral public testimony at this Hearing: Yes ☒ No ☐

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

<p style="text-align: right;">Page 82</p> <p>1 reasons stated for this project in the first place, 2 which is enervation of variable power sources, such as 3 wind and solar into the grid and it will increase the 4 capacity that the transmission lines would have to 5 provide. You can read that, and I'll skip over to what 6 is going on with particular storage in the past 7 10 years. 8 I would like to start with 2008 or '09 when 9 Nissan Leaf came out with all-electric cars that weighed 10 2,000 pounds and went 100 miles. And then Tesla comes 11 along with a 4200-pound car that runs like a rocket and 12 did 300 miles. Then Tesla further, in the aftermath of 13 Maria in Puerto Rico, they supplied the hospital down 14 there with power until the juice got turned back on to 15 them. 16 Kodiak Island is an independent grid that was 17 run by diesel and now is being powered by renewables. 18 The John Day Dam on the Washington side had a project 19 permitted for a wind farm, and that wind farm would take 20 water from below the John Day Dam and back up above it, 21 therefore, making the John Day Dam a more efficient 22 battery. And then in Turkey, General Electric developed 23 an integrated project of solar, wind, and a gas turbine 24 to produce electricity. 25 It seems like this technology has moved rather</p>	<p style="text-align: right;">Page 84</p> <p>1 heard. 2 HEARING OFFICER WEBSTER: And they need the 3 opportunity to do so. 4 MR. PETER BARRY: I'm just using some of my 7 5 minutes. I'll burn a minute or two for that one. 6 But I'm passionate about this. You have seen 7 this beautiful valley. Hanley used to live here. 8 Unfortunately, he was a community planner, he didn't 9 protect the viewshed. But we're NIMBYs; right? Oh, we 10 don't want you going up our road, we don't want you 11 going on our land. 12 But 300 miles, 300 miles of Oregon and you 13 guys have a chance to derail this stupid idea. You can 14 slow it down, derail it, you know you can. You have all 15 of these different ways. You can allow contested case 16 hearings. You can look at all of the stuff Stop B2H is 17 going to submit. You can look at every one and go, Huh, 18 that's a pretty good point. Can Idaho Power really 19 prove that verifiably? Can they really prove it? 20 Ten years ago, more than 10 years ago they said, We want 21 to build this line. A for-profit corporation. 22 I used to think utilities were like a public 23 service agency. They brought you water and electricity. 24 We all love electricity. It turns out Idaho Power is a 25 terrible juggernaut. They wanted to plug up Hells</p>
<p style="text-align: right;">Page 83</p> <p>1 rapidly. I think we are in the crossroads of whether we 2 need increased transmission or see if storage technology 3 is going to make that obsolete. There is going to be a 4 few more cards dealt in this. I've always thought at 5 this point in time this project just needs to be kicked 6 down the road and see what happens. 7 That's it. 8 HEARING OFFICER WEBSTER: Thank you. 9 Following Mr. Barry, we will hear from Steven 10 Clements. 11 MR. PETER BARRY: Yeah, I've got my 7 minutes 12 here. I'd really appreciate it if you guys would all 13 listen to me. Hanley, all you guys, I wish you would 14 all listen to me. Maybe you are all listening intently 15 but you are not making eye contact with these good 16 people who have come far and worked hard all day long, 17 and they deserve to be heard. And maybe some of their 18 comments are not germane and they are not perfectly 19 denoted by page and appendix and which tower that Idaho 20 Power dreamt up, but none of us want this line. 21 Who wants this line? Anybody? 22 UNIDENTIFIED SPEAKERS: Not me. 23 MR. PETER BARRY: Stand up and -- 24 HEARING OFFICER WEBSTER: Mr. Barry. 25 MR. PETER BARRY: These people need to be</p>	<p style="text-align: right;">Page 85</p> <p>1 Canyon, the last free-flowing stretch of the Snake 2 River, the last stretch. They lobbied hard. They spent 3 millions of their ratepayers' dollars trying to plug up 4 the last wide beautiful stretch of the Snake River. 5 Took it all the way to the Supreme Court of our land, 6 and fortunately, they had the wisdom to slam them back. 7 They wanted to build a coal-fired plant right 8 by Boise that has horrific air quality. Fortunately, 9 that was slammed down, too. 10 This is your chance to stop this stupid idea. 11 We are talking about should it be built here or there. 12 Oh, we love our view, we love our backyard. We love it 13 here. Maybe you don't, maybe you want to live 14 somewhere, that's fine, but we love this place. And 300 15 miles, and it's not federal land; it's public land, we 16 own it. We all own the federal land; right? It's ours, 17 it's yours. 18 And you guys have a chance, you have a little 19 slice of voice; we don't. We get our 7 minutes, that's 20 it. We can try to comprehend 20,000 pages of gibberish 21 while trying to raise a family and hold down two jobs or 22 raise four kids. That's what we can do. We can try to 23 discern this crap. 24 It's difficult. Have you guys, have any of 25 you read all 20,000 pages? Any of you? No one can do</p>

<p style="text-align: right;">Page 86</p> <p>1 it. Your staff can't read all 20,000 pages. They each 2 have a section, they try to understand it, and then you 3 ask Idaho Power, What the hell does this mean? And they 4 go, This is what it means. No, really, we've got your 5 back. We will fill you in on that. 6 Have you heard of regulatory capture? That's 7 where their staff is interacting with your staff, day 8 and night, day and night, going out to lunch together, 9 and they become friends and colleagues. 10 And no disrespect to you or your staff, I 11 appreciate that you're doing this voluntarily. You come 12 all the way out here, and you went to Morgan Lake. 13 That's great you did that. We appreciate that. But we 14 want to stop this damn thing. There's no need for it, 15 and we can prove. There is no need for it. It would 16 cause -- as everybody has testified, it would cause 17 horrendous damage through our public land for our 18 great-grandkids, not just us, but our grandkids and 19 their kids. It would just be this ugly nightmare out 20 there. 21 And it's not just because it's ugly, I don't 22 want to see it. But we don't need it. We don't need a 23 300-mile long clear-cut. We don't need it. 24 If any one of you or me went to a doctor and 25 said, I've got a back pain. And they said, Oh, we have</p>	<p style="text-align: right;">Page 88</p> <p>1 says, You know what, we have an alternative, we have an 2 alternative solution. 3 This is 2018, and in another 5 years we 4 have -- we already have solar, wind; right? We have all 5 this stuff. We have storage. Every day it gets better, 6 it's amazing. 7 So if someone says, You don't need an 8 operation, we can fix you with new technology, every one 9 of us would grab that opportunity; right? Wouldn't we? 10 Or would we build this dinosaur because Idaho Power 11 wants to make 70 million bucks with PacifiCorp, owned by 12 Warren Buffet, a billionaire, he's a billionaire, and 13 Idaho Power is a for-profit corporation; right? I'm not 14 making this stuff up. This is true. They want to make 15 a bunch of money. Warren Buffet probably said he'd buy 16 Idaho Power if they shoved this line through or 17 whatever. 18 We don't want it. No one in Oregon called you 19 guys and said, Would you please build a big power line 20 across Oregon. Nobody said that; right? 21 Same with Cove Power, no one is saying, Please 22 build a pipeline across Oregon, across 200 creeks. No 23 one is doing that except these profiteers. I don't like 24 that, not personally, but I don't like corporations 25 shoving their power line through our valley and across</p>
<p style="text-align: right;">Page 87</p> <p>1 got a solution, we will just put a slice down your spine 2 and we can fix it. And you're like, Boy, that sounds 3 pretty bad. They go, Oh, we have another option. We 4 can slice down the other side of your spine. 5 Oh, that's our preferred grid and Mill Creek. 6 That's what we got. Thanks a lot. Slice away. 7 Then you go, I'm going to hire experts. And 8 for 2 years those experts study and study and study and 9 they spend \$20 million, the BLM I'm talking about. They 10 spent 20 million bucks to do this research on where is 11 the preferred route, not that it should be built or not. 12 Just if you're going to build the damn thing, where 13 should you put it. 14 All those scientists, all those analysts, all 15 those experts spending all that money and time, they 16 said, Build it way over there. Well, Idaho Power gets 17 to say, We don't care what you said. They paid for it, 18 they had to pay for it. Well, they didn't pay for it, 19 the ratepayers paid for it; right? The ratepayers had 20 to pay a lot of money for that study. They ignored it. 21 So that's like us going, we pay for all these 22 doctors to study and the doctors say, Oh, we've got a 23 much easier treatment for you. You're not going to take 24 that treatment, are you? You don't want to get cut 25 open, you don't want that treatment. And then someone</p>	<p style="text-align: right;">Page 89</p> <p>1 my state. I love my state. I love Oregon. That's why 2 I live here. I'm sure you guys love Oregon, too. 3 So what I'm asking you, please, all of you, 4 please, when you hear an argument from Stop B2H, from 5 any of these good citizens or anyone else, please have 6 your staff analyze that material very, very carefully 7 and then call us back if there is any questions. Don't 8 just say, Idaho Power, oh, they've responded. Okay, 9 that's the answer. 10 I saw that with the PUC. They just asked 11 Idaho Power, How is that? And they answered. They 12 didn't ask anybody else, What's your opinion? What's 13 your view? What's the truth? Idaho Power lies, gives 14 half truths, misinformation. It's inappropriate. 15 Can you tell I'm angry? All these people are 16 angry, too, and a bunch more. We represent a tiny group 17 of people, a tiny group of people. So I'm asking you, 18 please help us slow this thing down, help us stop it. 19 I know you can't consider another intelligent 20 route, if there was going to be a line, it should be 21 somewhere else. I know you can't consider that, but we 22 need to kill this thing. It's a stupid, terrible idea. 23 You know it, I know it. The only people who want it is 24 Idaho Power and PacifiCorp, and BPA pulled out; right? 25 They are not telling anybody; right? Didn't they,</p>

<p style="text-align: right;">Page 90</p> <p>1 didn't BPA pull out? It's not in their budget; right?</p> <p>2 The third partner pulled out. Why did they?</p> <p>3 They already cancelled the big power line, or a small</p> <p>4 power line they were planning from Portland north into</p> <p>5 Washington; right? They cancelled that one. Now they</p> <p>6 pulled out, at least according to their budget, B2H</p> <p>7 isn't in their budget anymore.</p> <p>8 Anyway, we're not getting good information</p> <p>9 from Idaho Power. You're not getting good information</p> <p>10 from Idaho Power. Don't rubber stamp this thing. Don't</p> <p>11 check it off the box. Went to La Grande, went to</p> <p>12 Pendleton; rubber stamp, build the line. Don't do it,</p> <p>13 please. Don't do it. This is your chance. You have</p> <p>14 the power to help Oregon.</p> <p>15 Thank you for listening.</p> <p>16 HEARING OFFICER WEBSTER: Thank you.</p> <p>17 MR. STEVEN CLEMENTS: It's kind of hard to</p> <p>18 come up here after that. Thank you, Pete.</p> <p>19 My name is Steve Clements. I'm the mayor of</p> <p>20 La Grande. My address is 1000 Adams Avenue.</p> <p>21 Before I start to speak, I want to thank all</p> <p>22 the people that came up here and spoke this evening.</p> <p>23 I'm particularly impressed by the background that they</p> <p>24 have, the work that they have done. They are to be</p> <p>25 commended for all the time that they've put in. It's</p>	<p style="text-align: right;">Page 92</p> <p>1 process.</p> <p>2 The La Grande City Council has been clear in</p> <p>3 its opposition to the project beginning with its first</p> <p>4 correspondence with ODOE in August of 2017 and again</p> <p>5 this past April in a proclamation that it made opposing</p> <p>6 the line. The City has also been consistent with its</p> <p>7 request that EFSC include mitigation to address the</p> <p>8 City's concerns if the project is approved.</p> <p>9 We very much appreciate the inclusion of our</p> <p>10 staff's recommended conditions related to transportation</p> <p>11 and the impacts to Morgan Lake in the draft proposed</p> <p>12 order. We are hopeful that the transportation and</p> <p>13 conditions resolve the concerns raised by the City and</p> <p>14 Union County throughout the process.</p> <p>15 Of the two routes identified in the</p> <p>16 application, the applicant has selected Mill Creek, the</p> <p>17 most impactful to La Grande. It will be visible up here</p> <p>18 on our end of the valley as the proposed route.</p> <p>19 And the Morgan Lake, which also impacts City</p> <p>20 property because that entire Morgan Lake Park belongs to</p> <p>21 the City of La Grande. We have spent a lot of money up</p> <p>22 there keeping it and improving it as a recreational</p> <p>23 opportunity for people in this county. That is the</p> <p>24 alternative route.</p> <p>25 And I cannot say this more emphatically: We</p>
<p style="text-align: right;">Page 91</p> <p>1 amazing. What I know about this project comes to about</p> <p>2 this much relative to what they know (indicating).</p> <p>3 Anyway, thank you for the opportunity to</p> <p>4 present this evening. The La Grande City Council, which</p> <p>5 represents more than 13,000 people who will be</p> <p>6 negatively affected by this transmission line, has</p> <p>7 provided comments through staff, through our city staff</p> <p>8 at each of the steps in the process; so you have some of</p> <p>9 our input already.</p> <p>10 I will reiterate some of that and add to it.</p> <p>11 In 2019 and '17, the La Grande City Council, in</p> <p>12 partnership with the Union County Commissioners,</p> <p>13 conducted two public meetings in this very room to hear</p> <p>14 from residents regarding the project in conjunction with</p> <p>15 the amended preliminary applications. Public sentiment</p> <p>16 expressed at those meetings overwhelmingly opposed the</p> <p>17 transmission line. You are hearing some of that this</p> <p>18 evening.</p> <p>19 The bases for that opposition included, but</p> <p>20 was not limited to, reduced property values to homes</p> <p>21 along the proposed route; viewshed impacts throughout</p> <p>22 the area; environmental impacts both during construction</p> <p>23 and when the transmission line is operational; impacts</p> <p>24 to recreational facilities such as Morgan Lake; and a</p> <p>25 lack of public notice and involvement throughout the</p>	<p style="text-align: right;">Page 93</p> <p>1 oppose, the City of La Grande opposes both of those</p> <p>2 routes. And while I realize that the BLM-preferred</p> <p>3 route is outside of your consideration, and I appreciate</p> <p>4 what you gave us as guidelines before, the City Council</p> <p>5 is very concerned about the decision by the applicant</p> <p>6 not to submit the route which has lower social and</p> <p>7 environmental impacts than the two identified routes. I</p> <p>8 cannot understand why that route was not put in there,</p> <p>9 personally.</p> <p>10 For the proposed route, we ask that a</p> <p>11 condition be included to require H-frames. We are</p> <p>12 talking about mitigation. Now, these are requests that</p> <p>13 we put forward. This is going to be somewhat different</p> <p>14 than what you and I agreed to.</p> <p>15 But for the proposed route we ask that a</p> <p>16 condition be included, so that's the one up here, to</p> <p>17 require H-frames with a tower height no greater than 130</p> <p>18 feet, with weathered steel between milepost 106/2 and</p> <p>19 milepost 108/5. Idaho Power has indicated that they</p> <p>20 agree to this level of mitigation.</p> <p>21 For the Morgan Lake alternative, the draft</p> <p>22 proposed order includes requirements for these same</p> <p>23 H-frames between miles 5-7 of Morgan Lake as a</p> <p>24 recommended condition. The City of La Grande would like</p> <p>25 to express that as an alternative, the City would accept</p>

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 12:56 PM
To: peter barry; B2H DPOComments * ODOE; TARDAEWETHER Kellen * ODOE; EFSCcomment@stopb2h.org
Subject: B2H application siting Comment --Do NOT approve siting for B2H --- submit comments for record

From Peter Barry,

To EFSC Staff and Council,

Staff, PLEASE do not recommend to the Council to allow siting in any fashion for the B2h application. This is on you, as they listen to you, and clearly do not have intimate knowledge of this application as do you, and it many issues, inadequacies, deceptions and Lack of Need.

Do not make ANY siting approval for the B2H because :

((Citations and examples of all of these issues are clearly delineated in the submissions by STOPB2H et al.))

1)Idaho Power and partners have fallaciously morphed the reason for 'need.' The for-profit Idaho Power and other two partner applicants, realized they could not 'justify' in any way the 'old need' so they invented a new one. It is based on virtually incomprehensible computer modeling that has been manipulated by them to produce the numbers they seek. The 'new' need is also not justifiable. At the very least, a neutral third party analysis of the computer modeling and all inputs and algorithms should be mandated before any further consideration of this application is made. DENYING THIS APPLICATION WILL HAVE NO SIGNIFCANT IMPACT.

2)The applicants proposal is rife with omissions, mistakes, misinterpretations, erroneous modeling, assertions and projections, and our right fabrications. These are well documented (citations) by others in other submissions.

3) After years of intensive investigation, with millions of dollars spent, the BLM experts, analysts and scientists in many fields, made a clear recommendation of a 'Preferred Route' which had the least impact on all resources. (note that the BLM was NOT tasked with determining 'need.') Idaho Power had said many times they would wait for the Final EIS before announcing their route. But less than 2 months (I believe it was less than two weeks) before the BLM made their announcement, Idaho Power conjured up an all new route right by LaGrande Oregon that had not gone through analysis, and declared it their choice.

When asked by the Council why they had not waited for the BLM Preferred Route IP representative claimed it was because of time constraints. Completely unbelievable. IP is suggesting they did not know what The BLM was doing (which route was being considered as the BLM priority route= Preferred route) even though they were involved and in communication throughout the process.

The Preferred Route would ameliorate a majority of impacts in the Union County segment near La Grande, and the Morgan Lake area almost entirely.

The Mill Canyon and Morgan Lake routes have not been properly studied nor has the public or Council had the data nor time to seriously these last minute additions. Further, they are not 'similar to' the others proposed alternatives, nor close enough to warrant the Applicant the ability to use other data and studies and apply to these terrible alternatives that have severe risks and huge impacts on the community and environment and are much less safe. Since these routes have been chosen by IP as their two routes of choice, they must be required to start the application process anew and propose these routes at the beginning of this new process.

Any siting of the BLM should have the Applicant chose the BLM preferred route as their proposal and not the 'least preferred' routes. It is clear that the way in which the process has been interpreted by the Council, it has become definitively biased against the interests of the Public, landowners, the environment and communities. EFSC should wield the common sense and regulatory power that they do have. Do not tell the Citizens it is 'not in the regulations.' EFSC has any number of potential and real ways to protect the people and the State. Or, are you telling the Citizens you are impotent in the face of any corporate interests? Regulatory Capture is causal in this lack of State agency action.

4) Idaho Power has actually lobbied against laws to encourage or facilitate proven alternative energy sources in the Idaho Legislature and also failed to implement proven energy saving measures in its operation and those of its customers. A failure of a Corporation to adequately serve its customers and the needs of the State are no reason for another State, in this case Oregon, to enable inept and profiteering behavior on the part of a private entity. In fact it is a substantial and 'reasonable' cause not to do so.

5) Energy use and need has been essentially flat and projections regionally and nationally indicate this trend will continue. That IP and its partners can leverage the siting process to game their rate payers out of approx. \$70 million in profit for their private investors, while simultaneously burdening rate payers with the bill for well over a One Billion Dollar plus construction fee, leads any common sense person to question IP and its other monopolistic partners motives in fluffing up their stock portfolios at the expense of consumers who have no choice in suppliers. In addition, not requiring a massive bond which would at least cover the huge costs of decommissioning and clean up of this almost certainly 'stranded-asset'---as in, an astronomical burden on tax payers and rate payers to clean up the damage. We know this happens with all types of mines and other industrial permitted activities. EFSC must require a bond more than sufficient to cover all potential exigencies.

6) While IP claims BPA is still interested in the unneeded B2H line, their most recent budget belies this claim. BPA does not include budgetary consideration for future involvement of the application and construction. EFSC should get guarantees from the BPA or stop all application process until the time full participation and funding (and bonding) is known. It is only normal prudence to not allow continued activity without clear agreements which are fully funded by all participants. We are all aware that the BPA has just recently ended commitments to build a 'necessary' transmission line and their state reasons are telling.

7) Death Spiral of conventional generation and distribution systems are well researched and documented and EFSC should not site the B2H without completed research relating to this phenomenon vis a vis the B2H application and near and long term energy economics. Basic realities should be of primary concern---not filling boxes on an application process. If you were a prudent investor would you sink more than a billion dollars in such a poorly documented and spurious scheme? I hope not.

8) IP must adequately prove to a very high standard that upgrading existing transmission capacity is not as useful and economically and environmentally beneficial to the State of Oregon, its Citizens and to the most probable and 'common sense' future of rate payers and the environment. It has not yet satisfactorily made this case. IP's basic argument distilled down to its foundation is : "we don't want to." Any reasonable person wonders if their profit motive vis a vis the B2H application and construction is driving their decision making process. As a 'for-profit monopoly' with the CEO and others holding stock they want to profit from, this is undeniably the case. It is in fact germane to have the documents and all communications between Pacific Corp and Idaho Power to know what plans Warren Buffet et al have communicated in buying out IP, or other schemes. The Public and the Oregonians who would suffer under this application have a right to know.

9) Climate Crisis should be the single over-riding criterion for the Council to consider any application. While some suggest the B2H might be useful for moving 'alternative energy' research indicates that energy users and rate payers benefit the most from local generation and distribution with the immense added benefit of not being subject to massive and cascading grid failures which are predicted to get worse. Large scale transmission grids are subject to large scale failures ---which are only becoming more severe with enemy hacking and ransom actions and demands by bad-actors. We have a grid that could be bolstered and protected. Siting 'old-school' technology of additional large scale transmission capacity only detracts from and slows the efforts for local and regional resiliency. Rather, using state of the art conservation and alternative energy sources is clearly the current best practice with immense benefits in every category.

10) Allowing any motion forward on this application should be done only if there is iron-clad proof of its unquestionable necessity. One additional reason, if you might for some reason need one, is that a huge amount of the line/route proposed by IP crosses a almost 200 miles of private property parcels (almost double that of Public Land). Most of these owners do not want the line on or even near their property. How many land owners---or Citizens of this State have written you and promoted this project? IP would use Eminent Domain to 'take' the owners land. Compensation is miserably paltry, so 'taking' is an accurate descriptor. The effects are long lasting-- perhaps for 50 or more years. As a Public agency designed to serve the Public....you must take this reality into consideration. We are a Nation and a State that honors and defends private property rights. Imagine this fabricated project being bulldozed through your homeland. Your role is protect the right of owners unless insurmountable needs are proven beyond any doubt. Clearly there are hundreds of unanswered questions and issues with this application-- to take others peoples land to give more profit to an out-of-state corporation.

11) The Public Lands that would be severely damaged and altered are also owned and held for all Americans, now and all future generations in perpetuity. These are not 'Federal or State lands', these are the Peoples' lands. The many impacts are massive, multi-dimensional, well documented, and very long lasting. EFSC should not approve any siting of this spurious project with so many questions concerning basic facts in the application, omissions, and out right fabrications in the application. The effects are certain, the claimed 'benefits' are spurious and flimsy.

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From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 1:05 PM
To: B2H DPOComments * ODOE
Subject: Fw: Siting application for B2H comments, include in the Record --- Please include in official comments for EFSC consideration

To the Staff and Commissioners of EFSC,

Do not read this unless you think you are open minded to some genuine, self reflection and evaluation of this important process. If you are as you appear -- self-certain, and so sure you are much more intelligent than the rest of Oregonians, than why waste your time on comments by an inferior. Though it should be easy and somewhat satisfying for you to flick aside any and all of my perceived issues.

Everything we each do, our choices, behavior, our actions, reflects our ethics. What are yours? This is a germane and fair question as huge impacts are effected by them.

Do you see your role simply as a Rubber Stamp bureaucrat? (I'm sure not. That would be simplistic and not reflect all that you know and do.) Yet, this is the sad and demeaning history of EFSC --- of your 'decision making.' Rubber Stamping. It is not really decision making ---- the decisions are made by the corporations that exploit (did I mean to say 'serve') the people and resources of the State, and exploit the natural capital and virtues of all future Citizens--- all for a profit. And you merely 'legitimize' these corrupt practices. (Are you apprised of and actively countering Regulatory Capture by the applicants in your role?) Have you EVER refused to site anything? Or, sited a project only after huge alterations that were asked for by Citizens or groups, or those effected? Please correct me with a few examples. Easy, right?

Wait! Are you going to quit reading already? Because.....? you do not like hearing the truth? Or maybe I am wrong.... just give it couple more paragraphs....a few minutes. (You want to read about Hanley's tarnished past, right?)

The recent Oregon State Supreme Court ruling clearly slapped you and your corrupt practices back a bit. We peasants were so pleased that you made rule changes to 'promote public access and transparency'! Well, you are right---you are smarter than all of us, because we are so easily duped. We believed you, and took you at your word! You actually did the opposite of what you said. Apparently the Citizens of this fine State must rely solely on the Court's justice after you meekly and predictably approve yet another terribly conceived and proposed plan for corporate profit. It serves the State? The Citizens? Are you unconscious?

Now 'Councilor' Hanley Jenkins was unfortunately the County Planner for Union County for some years. He did nothing during his tenure to protect the County from onslaughts such as the B2H --and we can all only predict that he will vote to Rubber Stamp this profit-grabbing, un-needed project that will harm his very own neighbors and fellow Citizens. (oh, right...ex-neighbors, he moved.) Why is this so certain? Because he was instrumental in tearing down a purpose-built structure in La Grande

that was only 15 years old. Who would do that? And why? Because he and the other good ol boys in the County could not see past their own first 'plan' and their own short-sightedness----and in spite of huge protests and multiple alternatives, chose to site the new courthouse, right where the protective center for the most abused citizens among us, were assisted in their most profound time of need. Right Hanley? Tear down an almost new Abused Womens and Children's Center, that was perfectly located next to the Police Station. The good people of Union County know they will not find a 'defender' in this man with so little heart or imagination.no, no hope can be expected from this much-detested and reviled mr jenkins. He owns what he wrought...as do you.

Now the rest of you --- not so well known on this side of the State ---- of the eastern part of the East/West divide.... but we got a glimpse into your hearts when you came to the meetings in our towns. Truly disgusting behavior on your part---shame on you. To pretend to hold 'listening' hearings. (" it is required " ---the 'dog and pony show,' ...for some silly reason it is in the damn regulations.) I am certain you did in no way fulfill the important and legal duty to promote Public input.

Worried Citizens, some scared, some angry, some well researched, came to be heard. People almost always said " Thank you for coming to listen to us tonight." But it was absolutely clear that you were not listening, and were not hearing, and clearly did not care. All people are aware when they are, and when we are not being listened to. In those few hours each of those nights, you tore down our Democracy bit by bit. I watched you all carefully. Watched while you tapped away on your laptops, or wrote something or the other on paper...clearly having nothing to do with the people in front of you. I and others were enraged and disgusted. You all should have been tarred and feathered, at the least. Would that not be justice for your disrespect of your fellow Citizens? You are lucky that these good folks are indeed respectful....unlike yourselves.

What exactly are you doing on this Council? Do you have any understanding of the projects or actually care about the costs and impacts on our State--- our environment , our people? I would like to quiz you about some obvious facts about the B2H and see how many you can answer. Are you willing? So why are you on this Council? Certainly not 'service to the Citizens of the State! Service to the corporate interests? You say, 'no'. What then? How are you serving us now? The future?

You will not read the hundreds of legitimate, well cited, arguments presented to you. We can be certain of this. We suppose you must instruct the staff to do their best to come up with at least some reason each and every argument, concern, and point are without any merit, and once again ink-up your well used rubber stamp. You all are so sadly without ethics, and so predictable.

It may seem harsh...but this seems somehow appropriate. I want to promise each of you will I will post in the ubiquitous and never dying digital sphere, your 'decisions.' That you abrogated your sacred trust. You squandered your little bit of power to serve the monied interests over the People and the Planet and the future. I will do it to provide a small--- a very very small, bit of Justice. And therefore your children, family and acquaintances will know the truth about you, and so maybe they will strive to do right... to right your huge and inexcusable wrongs.

Peter Barry
60688 Morgan Lake Rd.
La Grande, Oregon 97850

petebarry99@yahoo.com

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 1:10 PM
To: EFSCcomment@stopb2h.org; TARDAEWETHER Kellen * ODOE; B2H DPOComments * ODOE; peter barry
Subject: Idaho Power application B2H Official Comments Plz include in the Record-- EFSC Comments

To EFSC Staff and Councilors,

EFSC staff should recommend to the Council to NOT ALLOW SITING of B2H transmission line. Application should be denied based on the following, and including all the other objections also filed by others. (Because average Citizens have limited time and expertise to research and respond to such a complex and convoluted application and process---a 'reasonable person' can plausibly project that there are many other inadequacies, errors and failures in the application that the working Citizens just have not had the time to yet uncover. These and others objections submitted are only a small representation of the failures of this damaging and un-needed project.)

In the Union County Planning Document:

Agriculture:

"4. That the rural character and farming activities of agricultural 'uses will be protected to preserve the scenic attractiveness and economic, social and physical living conditions desirable to farm families."

Where as the B2H proposed routes would cross many privately owned and operated agricultural parcels, and would definitely negatively impact one, some or all of the rules, values and stipulations in the County Plan described in #4, on some or all of the parcels, and no appropriate nor reasonable mitigation has been proposed to protect the values protected within this Plan.

For the scenery aspect, Specifically, OAR 345-022-0080, in describing Scenic Resources, states "the Council must find that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to scenic resources and values identified as significant or important in local land use plans...." Has the applicant consulted with land owners concerning scenic impacts. Have they consulted with County officials on mitigation? There would be 'negative impacts, with out any doubt. The applicant has not proposed any mitigation solutions to address these negative impacts that are protected against in the County Planning document.

The applicant has not adequately or substantively addressed "social and physical living conditions to farm families" in its application. These aspects are inarguably fundamental to all Humans worldwide and are the basis for 'quality of life.' Nowhere in the application are the highly important social living conditions protected in the Union County Plan addressed in any meaningful way. Clearly research

into these negative impacts are needed prior to any approval for as site certificate. Anybody who has owned a home or land, especially agricultural land, can attest to the fundamental importance of 'the Home Ground', especially the connection and value of 'the families land' that has often been passed down through generations. These agricultural land are the core and center of families and therefore whole communities. Where in the application are these values (which are elucidated and protected In the County Planning document cited above), discussed and mitigated, as if that were even possible.

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These protections and the obvious significant impacts are not addressed nor mitigated and no justification of any exception is warranted. The applicant does not comply with Applicable Substantive Criteria in the Land Use Standards in 345 022 0030 nor the Statutory Authority mandated in ORS 469.470 or 469.501 or any others. The application must be denied.

The applicant does not address the County law, nor mitigates the severe and obvious significant adverse impacts that protects these individuals rights clearly stated in the Planning Document.

These are just some of the many risks and negative impacts that do not comport with the "physical conditions desirable to farm families." Agricultural work is already extremely difficult and demanding work, and the negative effects of the applicants proposal on basic irrigation practices (pivots movement, handlines safety risk, etc), on the movement and control of livestock with changes in fencing and gates required, loss of shade trees for livestock in any ROW (right of way) clearing, weed issues caused by soil disturbance (weeds growing on the ROW) would cause airborne seed dispersal, and seeds would be are transported by IP equipment. Inadequate plans by the applicant and lack of any substantive mitigation for significant adverse impacts to of economic loss, much less any attempt at an accurate estimate in the application of true economic loss to farmers, ranchers, timber owners, does not comply with 345 022 000 or any other law concerning accounting or mitigation of economic impacts protected under the County Planning document.

Perhaps most significant and not addressed in the application adequately and without appropriate mitigation is the 'taking' (aka 'purchasing') easements, especially unwilling sellers--through Eminent

Domain. That Humans have always been closely tied to the land, and to certain parts of the land, to the point that these lands become 'sacred' is without dispute. Nowhere in the application are the County 'protections' of this and other 'condition desirable to farm families' addressed adequately or somehow mitigated.

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Just this one aspect of the law in the Union County Plan document is reason enough to deny this application for siting. Of course there innumerable other germane and significant reasons to deny this application which have been presented to you.

Do the right thing, Deny this Siting Application.

Peter Barry
60688 Morgan Lake Road
La Grande, Oregon 97850

petebarry99@yahoo.com

ESTERSON Sarah * ODOE

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 3:11 PM
To: TARDAEWETHER Kellen * ODOE; efsccomment@stopb2h.org; peter barry; B2H
DPOComments * ODOE
Subject: B2H comments for the Record-- Application by Idaho Power/b2h/ DENY

To EFSC Staff and Council,

Do NOT approve any siting of Idaho Power application for the reasons below, and the many, many other issues embodied in this travesty of a proposal. Many of them have been submitted to you, so you can read them, research them, find out they are legitimate and legally significant and actionable concerns, and act on them. Deny this siting application.

Staff, you have spent countless hours and months dealing with IPs incompetence in this application--- their failures, obscuration, false-hoods, mistakes, inconsistencies some connived, some legitimate mistakes, and on and on.....at least give the Citizens a break...at least the same breaks IP has been granted along the way, even though they deserve more and better. You actually work for us, your fellow Citizens....and your job is not to help site this atrocity....it is to demand the very highest standards of the applicants. You have an opportunity to help ensure the current and future welfare of the State, it's Citizens, and the land we are blessed to call home. Do your very best to stop this nightmare, and serve us, make us proud and keep Oregon healthy. Recommend to the Council that this application be denied....there are plenty of legitimate and legal and common sense reasons to do so. No question of that. The Council should follow your lead. If they do not, that's on them.

The concerns and issues below stem from the foundational Planning document for Union County, Oregon. The Union County Plan. [Meet Google Drive – One place for all your files](#)



Meet Google Drive – One place for all your files

Google Drive is a free way to keep your files backed up and easy to reach from any phone, tablet, or computer. S...

Pg 6 , #10 "land and water resources be protected". The setbacks proposed in the application for construction or severely inadequate to prevent erosion during large storm events, flooding, and other weather events. The proposed and unnecessary transmission line and it's temporary and permanent roads, tower bases, and cleared swath, will lead to erosional and other pollutants entering precious and clean water ways that are protected due to endangered species inhabitants in the watershed.

Significant Adverse Impacts of protected waterways and wildlife, primarily fish, see Oar 345 022 0060, 345 022 0700, 635 415 025 The applicant's stingy protection setbacks are inadequate and must be increased in size based on local advice relating to topography, soils, and weather events. A bond for mitigation must be in place and sizable.

pg 7, #12 authorized use do no harm to neighbors, nor economy of the County see also #s 14 and 16. This goal and rule in the plan, which of course is a basic tenet of humans everywhere, alone will preclude any siting approval. Of course this self serving, money grubbing, planet grinding---and worst of all, Unnecessary project, WOULD HARM NEIGHBORS. Any questions? The significant adverse Impacts and Harm has been well documented in other comments, but of course include 345 022 0080, and the documented concerns of the local relator association and it's members, as well of course of hundreds if not thousand of home-owners within sight of the proposed travesty (line), many of whom testified tot he Council in person or in writing, are testament to the economic and visual impacts. ors 469.470, 469.501 et al

pg 8 and 9 see 1 through 7 , note esp #6 "the natural beauty of Union County is worth preserving... 345 022 0080 IF this stupid un-needed massive line were gouged across Oregon so Idaho Power's shareholders could make a few dollars...more than \$70 Million profit... of course it should be sited on the BLM vetted, common-sense, Preferred route that would solve most of the many and severe problems encountered in Union County. Make them reapply and select that route for all the obvious reasons. Yes, you can make that happen. Applicable Substantive Criteria 345 022 0030

pg 9 and 19, #S 9 though 15 B2H proposed routes would diminish prime lands available for rural residential, esp in low productive areas. The applicant does not even address this economic impact in their proposal. Necessary for any site approval, plus mitigation. 345 022 0030, oar 660 006

pg 12 second paragraph from bottom ---non-urban industrialrecognition not compatible with urban uses and activities 345 022 0030 Would dramatically and significantly adversely impact La Grande and nearby rural areas. 345 022 0080

top of page 15 'Morgan Lake area seen as potential for farm/residential' 345 022 0030

pg 16 ,,even rural residences'do not interfere with open space....' B2H would interfere with 'open space'. 345 022 0030

pg 20 #6 ...east of Morgan Lake area potential rural residential.. 345 022 0030

pg 25 Landslide concerns.... In Bold in document **"Development may activate stabilized landslide topography"** (like deep blasting and deep digging, road construction, etc???) (In 1979 those local yokels who wrote this Plan sure had an idea what blasting and road construction could do.) 345 022 0020

pg 29, plan change, 'that public need supports the change.' The Public clearly does not support this line. Why would anybody?

pg 31 ag land conversion, see all of #3 A-E, and #4 345 022 0030 applies.

"that the rural character of and farming activities of agricultural uses will be protected to preserve the scenic attractiveness and economic social and physical living conditions desirable to farm families."

pg 32 goal 'to conserve forest land for forest uses'

All of #1 through 10 --- B2H would negatively effect ALL of them, but esp #7 and #10

#4 That before productive forest or range land is converted or classified to include other uses, it will be demonstrated that such areas are more needed by the area economy for those uses.

#7. That sustained timber yield will be encouraged, even by owners of small woodlots.

#10 That non-forest related development in and around timbered areas will not limit timber production, harvest, haul out, slash disposal, road construction, scarification, fertilization, pest or disease control or other timber management operations.

Applicant erroneously minimized impacts and economic damage to forest lands and mistakenly inventoried them ORS 469. 504, oar 660-006

pg 33 Goal "to conserve open space and to protect natural, cultural, historical and scenic resources." 345 022 0080 and 345 022 0030

#2 That the following concerns will be taken into account in protecting area visual attractiveness:

- a. Maintaining vegetative cover wherever practical.
- b. Using vegetation or other site obscuring methods of screening unsightly uses.
- c. Minimizing number and size of signs.
- d. Siting developments to be compatible with surrounding area uses, and to recognize the natural characteristics of the location.

345 022 0030, oar 660 006

#6, That development will maintain or enhance attractiveness of the area and not degrade resources. 345 022 0030 Do not approve application for this reason alone.

#7
That sites or structures that have local, regional, statewide, or national historical or cultural significance will be protected to the extent practical (like Oregon Trail...) 345 022 0090

pg 35 Air, Water and Land Resource Goal

1. That planning decisions will recognize immediate and long range effects on the quality of natural resource, and those uses which may likely have an adverse effect on resource quality will be prohibited. IP and fellow scammers want you to swallow the notion that this effectively permanent (yes, and unnecessary) scar across Oregon will not have long range effects. How stupid do they think we are? 345 022 0030, et al

2. That all local, State and Federal agencies will be required to comply with the same air, water, and land resource quality regulations as required of private interests. 345 022 0030

pg 36 Hazard areas

4. That landslide potential will be recognized in any development south or west of La Grande, and that development will be prohibited in areas of known active landslide activity. 345 022 0020, 345 022 0030

pg 37 Economy

3. That suitability of proposed industrial developments will be evaluated according, but not limited to, the following factors: availability of local labor force, materials and market locations, transportation,

service and other community costs, relationship to the environment and present economic base, and similar considerations. 345 022 0030, ors 469.470, 469.501, et al

#5 That industries which might likely have undesirable effects on housing conditions, service costs, school and other public facility capacities and similar consideration will be discouraged. So, Discourage it.

The list goes on. Some of these are certainly actionable in the Courts and are relevant and germane to current EFSC process. These are from our guiding document on Land Use --polices and laws. We can fight on these existing rules and laws and win. But only if you help us do it. Are we going to throw up our hands because a few out of state, wealthy corporations want to 'take' our land, our resources, or quality of life ---all to make a killing? Make no mistake, they do plan on 'taking' it...and to use eminent domain to do it. We are fighting. Will you?

Scores of Citizens of this fine County have spent countless hours ---truly countless. More time than you will ever spend on any issue. They have become reluctant experts. They deserve, yet more importantly the entire County and State full of Citizens, now and into the future, deserve, a representative government that actually values them and the local resources, respects their value and concerns, and efforts --- and will at least fight along side of them, not cave in to an out-of-state scammer.

Will you do your job to serve Oregon and Oregonians --- or will we Citizens be obligated by you and Idaho Power, to go to the Courts to seek fairness and justice... to protect our Great State? Step up to the plate, do your job, protect your neighbors. Protect this fine State from these ravages for now and long into the future.

Peter Barry
60688 Morgan Lake Road
La Grande, Oregon 97850

petebarry99@yahoo.com

TARDAEWETHER Kellen * ODOE

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 12:56 PM
To: peter barry; B2H DPOComments * ODOE; TARDAEWETHER Kellen * ODOE; EFSCcomment@stopb2h.org
Subject: B2H application siting Comment --Do NOT approve siting for B2H --- submit comments for record

From Peter Barry,

To EFSC Staff and Council,

Staff, PLEASE do not recommend to the Council to allow siting in any fashion for the B2h application. This is on you, as they listen to you, and clearly do not have intimate knowledge of this application as do you, and it many issues, inadequacies, deceptions and Lack of Need.

Do not make ANY siting approval for the B2H because :

((Citations and examples of all of these issues are clearly delineated in the submissions by STOPB2H et al.))

1)Idaho Power and partners have fallaciously morphed the reason for 'need.' The for-profit Idaho Power and other two partner applicants, realized they could not 'justify' in any way the 'old need' so they invented a new one. It is based on virtually incomprehensible computer modeling that has been manipulated by them to produce the numbers they seek. The 'new' need is also not justifiable. At the very least, a neutral third party analysis of the computer modeling and all inputs and algorithms should be mandated before any further consideration of this application is made. DENYING THIS APPLICATION WILL HAVE NO SIGNIFCANT IMPACT.

2)The applicants proposal is rife with omissions, mistakes, misinterpretations, erroneous modeling, assertions and projections, and our right fabrications. These are well documented (citations) by others in other submissions.

3) After years of intensive investigation, with millions of dollars spent, the BLM experts, analysts and scientists in many fields, made a clear recommendation of a 'Preferred Route' which had the least impact on all resources. (note that the BLM was NOT tasked with determining 'need.') Idaho Power had said many times they would wait for the Final EIS before announcing their route. But less than 2 months (I believe it was less than two weeks) before the BLM made their announcement, Idaho Power conjured up an all new route right by LaGrande Oregon that had not gone through analysis, and declared it their choice.

When asked by the Council why they had not waited for the BLM Preferred Route IP representative claimed it was because of time constraints. Completely unbelievable. IP is suggesting they did not know what The BLM was doing (which route was being considered as the BLM priority route= Preferred route) even though they were involved and in communication throughout the process.

The Preferred Route would ameliorate a majority of impacts in the Union County segment near La Grande, and the Morgan Lake area almost entirely.

The Mill Canyon and Morgan Lake routes have not been properly studied nor has the public or Council had the data nor time to seriously these last minute additions. Further, they are not 'similar to' the others proposed alternatives, nor close enough to warrant the Applicant the ability to use other data and studies and apply to these terrible alternatives that have severe risks and huge impacts on the community and environment and are much less safe. Since these routes have been chosen by IP as their two routes of choice, they must be required to start the application process anew and propose these routes at the beginning of this new process.

Any siting of the BLM should have the Applicant chose the BLM preferred route as their proposal and not the 'least preferred' routes. It is clear that the way in which the process has been interpreted by the Council, it has become definitively biased against the interests of the Public, landowners, the environment and communities. EFSC should wield the common sense and regulatory power that they do have. Do not tell the Citizens it is 'not in the regulations.' EFSC has any number of potential and real ways to protect the people and the State. Or, are you telling the Citizens you are impotent in the face of any corporate interests? Regulatory Capture is causal in this lack of State agency action.

4) Idaho Power has actually lobbied against laws to encourage or facilitate proven alternative energy sources in the Idaho Legislature and also failed to implement proven energy saving measures in its operation and those of its customers. A failure of a Corporation to adequately serve its customers and the needs of the State are no reason for another State, in this case Oregon, to enable inept and profiteering behavior on the part of a private entity. In fact it is a substantial and 'reasonable' cause not to do so.

5) Energy use and need has been essentially flat and projections regionally and nationally indicate this trend will continue. That IP and its partners can leverage the siting process to game their rate payers out of approx. \$70 million in profit for their private investors, while simultaneously burdening rate payers with the bill for well over a One Billion Dollar plus construction fee, leads any common sense person to question IP and its other monopolistic partners motives in fluffing up their stock portfolios at the expense of consumers who have no choice in suppliers. In addition, not requiring a massive bond which would at least cover the huge costs of decommissioning and clean up of this almost certainly 'stranded-asset'---as in, an astronomical burden on tax payers and rate payers to clean up the damage. We know this happens with all types of mines and other industrial permitted activities. EFSC must require a bond more than sufficient to cover all potential exigencies.

6) While IP claims BPA is still interested in the unneeded B2H line, their most recent budget belies this claim. BPA does not include budgetary consideration for future involvement of the application and construction. EFSC should get guarantees from the BPA or stop all application process until the time full participation and funding (and bonding) is known. It is only normal prudence to not allow continued activity without clear agreements which are fully funded by all participants. We are all aware that the BPA has just recently ended commitments to build a 'necessary' transmission line and their state reasons are telling.

7) Death Spiral of conventional generation and distribution systems are well researched and documented and EFSC should not site the B2H without completed research relating to this phenomenon vis a vis the B2H application and near and long term energy economics. Basic realities should be of primary concern---not filling boxes on an application process. If you were a prudent investor would you sink more than a billion dollars in such a poorly documented and spurious scheme? I hope not.

8) IP must adequately prove to a very high standard that upgrading existing transmission capacity is not as useful and economically and environmentally beneficial to the State of Oregon, its Citizens and to the most probable and 'common sense' future of rate payers and the environment. It has not yet satisfactorily made this case. IP's basic argument distilled down to its foundation is : "we don't want to." Any reasonable person wonders if their profit motive vis a vis the B2H application and construction is driving their decision making process. As a 'for-profit monopoly' with the CEO and others holding stock they want to profit from, this is undeniably the case. It is in fact germane to have the documents and all communications between Pacific Corp and Idaho Power to know what plans Warren Buffet et al have communicated in buying out IP, or other schemes. The Public and the Oregonians who would suffer under this application have a right to know.

9) Climate Crisis should be the single over-riding criterion for the Council to consider any application. While some suggest the B2H might be useful for moving 'alternative energy' research indicates that energy users and rate payers benefit the most from local generation and distribution with the immense added benefit of not being subject to massive and cascading grid failures which are predicted to get worse. Large scale transmission grids are subject to large scale failures ---which are only becoming more severe with enemy hacking and ransom actions and demands by bad-actors. We have a grid that could be bolstered and protected. Siting 'old-school' technology of additional large scale transmission capacity only detracts from and slows the efforts for local and regional resiliency. Rather, using state of the art conservation and alternative energy sources is clearly the current best practice with immense benefits in every category.

10) Allowing any motion forward on this application should be done only if there is iron-clad proof of its unquestionable necessity. One additional reason, if you might for some reason need one, is that a huge amount of the line/route proposed by IP crosses a almost 200 miles of private property parcels (almost double that of Public Land). Most of these owners do not want the line on or even near their property. How many land owners---or Citizens of this State have written you and promoted this project? IP would use Eminent Domain to 'take' the owners land. Compensation is miserably paltry, so 'taking' is an accurate descriptor. The effects are long lasting-- perhaps for 50 or more years. As a Public agency designed to serve the Public....you must take this reality into consideration. We are a Nation and a State that honors and defends private property rights. Imagine this fabricated project being bulldozed through your homeland. Your role is protect the right of owners unless insurmountable needs are proven beyond any doubt. Clearly there are hundreds of unanswered questions and issues with this application-- to take others peoples land to give more profit to an out-of-state corporation.

11) The Public Lands that would be severely damaged and altered are also owned and held for all Americans, now and all future generations in perpetuity. These are not 'Federal or State lands', these are the Peoples' lands. The many impacts are massive, multi-dimensional, well documented, and very long lasting. EFSC should not approve any siting of this spurious project with so many questions concerning basic facts in the application, omissions, and out right fabrications in the application. The effects are certain, the claimed 'benefits' are spurious and flimsy.

Peter Barry
60688 Morgan Lake Rd.
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TARDAEWETHER Kellen * ODOE

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It is 'reasonable' to conclude that these protected and valued attributes ascribed in #4 apply to 'rural and farming' character and activities--- are also valued by the many small rural/agriculturally based communities adjacent to or nearby to these areas proposed to be effected by the applicant in this stupid proposal. Choosing the most narrow and limiting interpretation of Protections and intent in Plans and such, does not serve the populace nor the State. Just as choosing the most generous interpretation for applicants and assuming that mitigation will be preformed as assumed or described at some later date is also unreasonable, inappropriate and does not adequately serve the populace, the process as intended nor any fair or reasonable form of due diligence. Is EFSC a robot? A robot remotely controlled by Idaho Power? The "intent" of the rules, laws and practices should be the applied standard. The actual and reasonably realistic negative impacts should be the core of evaluation and decision making.

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Just this one aspect of the law in the Union County Plan document is reason enough to deny this application for siting. Of course there innumerable other germane and significant reasons to deny this application which have been presented to you.

Do the right thing, Deny this Siting Application.

Peter Barry
60688 Morgan Lake Road
La Grande, Oregon 97850

petebarry99@yahoo.com

TARDAEWETHER Kellen * ODOE

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 1:01 PM
To: EFSCcomment@stopb2h.org; TARDAEWETHER Kellen * ODOE; peter barry
Subject: Siting application for B2H comments, include in the Record --- Please include in official comments for EFSC consideration

To the Staff and Commissioners of EFSC,

Do not read this unless you think you are open minded to some genuine, self reflection and evaluation of this important process. If you are as you appear -- self-certain, and so sure you are much more intelligent than the rest of Oregonians, than why waste your time on comments by an inferior. Though it should be easy and somewhat satisfying for you to flick aside any and all of my perceived issues.

Everything we each do, our choices, behavior, our actions, reflects our ethics. What are yours? This is a germane and fair question as huge impacts are effected by them.

Do you see your role simply as a Rubber Stamp bureaucrat? (I'm sure not. That would be simplistic and not reflect all that you know and do.) Yet, this is the sad and demeaning history of EFSC --- of your 'decision making.' Rubber Stamping. It is not really decision making ---- the decisions are made by the corporations that exploit (did I mean to say 'serve') the people and resources of the State, and exploit the natural capital and virtues of all future Citizens--- all for a profit. And you merely 'legitimize' these corrupt practices. (Are you apprised of and actively countering Regulatory Capture by the applicants in your role?) Have you EVER refused to site anything? Or, sited a project only after huge alterations that were asked for by Citizens or groups, or those effected? Please correct me with a few examples. Easy, right?

Wait! Are you going to quit reading already? Because.....? you do not like hearing the truth? Or maybe I am wrong.... just give it couple more paragraphs....a few minutes. (You want to read about Hanley's tarnished past, right?)

The recent Oregon State Supreme Court ruling clearly slapped you and your corrupt practices back a bit. We peasants were so pleased that you made rule changes to 'promote public access and transparency!' Well, you are right---you are smarter than all of us, because we are so easily duped. We believed you, and took you at your word! You actually did the opposite of what you said. Apparently the Citizens of this fine State must rely solely on the Court's justice after you meekly and predictably approve yet another terribly conceived and proposed plan for corporate profit. It serves the State? The Citizens? Are you unconscious?

Now 'Councilor' Hanley Jenkins was unfortunately the County Planner for Union County for some years. He did nothing during his tenure to protect the County from onslaughts such as the B2H --and we can all only predict that he will vote to Rubber Stamp this profit-grabbing, un-needed project that will harm his very own neighbors and fellow Citizens. (oh, right...ex-neighbors, he moved.) Why is this so certain? Because he was instrumental in tearing down a purpose-built structure in La Grande that was only 15 years old. Who would do that? And why? Because he and the other good ol boys in the County could not see past their own first 'plan' and their own short-sightedness----and in spite

of huge protests and multiple alternatives, chose to site the new courthouse, right where the protective center for the most abused citizens among us, were assisted in their most profound time of need. Right Hanley? Tear down an almost new Abused Womens and Children's Center, that was perfectly located next to the Police Station. The good people of Union County know they will not find a 'defender' in this man with so little heart or imagination.no, no hope can be expected from this much-detested and reviled mr jenkins. He owns what he wrought...as do you.

Now the rest of you --- not so well known on this side of the State ---- of the eastern part of the East/West divide.... but we got a glimpse into your hearts when you came to the meetings in our towns. Truly disgusting behavior on your part---shame on you. To pretend to hold 'listening' hearings. (" it is required " ---the 'dog and pony show,' ...for some silly reason it is in the damn regulations.) I am certain you did in no way fulfill the important and legal duty to promote Public input.

Worried Citizens, some scared, some angry, some well researched, came to be heard. People almost always said " Thank you for coming to listen to us tonight." But it was absolutely clear that you were not listening, and were not hearing, and clearly did not care. All people are aware when they are, and when we are not being listened to. In those few hours each of those nights, you tore down our Democracy bit by bit. I watched you all carefully. Watched while you tapped away on your laptops, or wrote something or the other on paper...clearly having nothing to do with the people in front of you. I and others were enraged and disgusted. You all should have been tarred and feathered, at the least. Would that not be justice for your disrespect of your fellow Citizens? You are lucky that these good folks are indeed respectful....unlike yourselves.

What exactly are you doing on this Council? Do you have any understanding of the projects or actually care about the costs and impacts on our State--- our environment , our people? I would like to quiz you about some obvious facts about the B2H and see how many you can answer. Are you willing? So why are you on this Council? Certainly not 'service to the Citizens of the State! Service to the corporate interests? You say, 'no'. What then? How are you serving us now? The future?

You will not read the hundreds of legitimate, well cited, arguments presented to you. We can be certain of this. We suppose you must instruct the staff to do their best to come up with at least some reason each and every argument, concern, and point are without any merit, and once again ink-up your well used rubber stamp. You all are so sadly without ethics, and so predictable.

It may seem harsh...but this seems somehow appropriate. I want to promise each of you will I will post in the ubiquitous and never dying digital sphere, your 'decisions.' That you abrogated your sacred trust. You squandered your little bit of power to serve the monied interests over the People and the Planet and the future. I will do it to provide a small--- a very very small, bit of Justice. And therefore your children, family and acquaintances will know the truth about you, and so maybe they will strive to do right... to right your huge and inexcusable wrongs.

Peter Barry
60688 Morgan Lake Rd.
La Grande, Oregon 97850

petebarry99@yahoo.com

TARDAEWETHER Kellen * ODOE

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 3:11 PM
To: TARDAEWETHER Kellen * ODOE; efsccomment@stopb2h.org; peter barry; B2H
DPOComments * ODOE
Subject: B2H comments for the Record-- Application by Idaho Power/b2h/ DENY

To EFSC Staff and Council,

Do NOT approve any siting of Idaho Power application for the reasons below, and the many, many other issues embodied in this travesty of a proposal. Many of them have been submitted to you, so you can read them, research them, find out they are legitimate and legally significant and actionable concerns, and act on them. Deny this siting application.

Staff, you have spent countless hours and months dealing with IPs incompetence in this application--- their failures, obscuration, false-hoods, mistakes, inconsistencies some connived, some legitimate mistakes, and on and on.....at least give the Citizens a break...at least the same breaks IP has been granted along the way, even though they deserve more and better. You actually work for us, your fellow Citizens....and your job is not to help site this atrocity....it is to demand the very highest standards of the applicants. You have an opportunity to help ensure the current and future welfare of the State, it's Citizens, and the land we are blessed to call home. Do your very best to stop this nightmare, and serve us, make us proud and keep Oregon healthy. Recommend to the Council that this application be denied....there are plenty of legitimate and legal and common sense reasons to do so. No question of that. The Council should follow your lead. If they do not, that's on them.

The concerns and issues below stem from the foundational Planning document for Union County, Oregon. The Union County Plan. [Meet Google Drive – One place for all your files](#)



Meet Google Drive – One place for all your files

Google Drive is a free way to keep your files backed up and easy to reach from any phone, tablet, or computer. S...

Pg 6 , #10 "land and water resources be protected". The setbacks proposed in the application for construction or severely inadequate to prevent erosion during large storm events, flooding, and other weather events. The proposed and unnecessary transmission line and it's temporary and permanent roads, tower bases, and cleared swath, will lead to erosional and other pollutants entering precious and clean water ways that are protected due to endangered species inhabitants in the watershed.

Significant Adverse Impacts of protected waterways and wildlife, primarily fish, see Oar 345 022 0060, 345 022 0700, 635 415 025 The applicant's stingy protection setbacks are inadequate and must be increased in size based on local advice relating to topography, soils, and weather events. A bond for mitigation must be in place and sizable.

pg 7, #12 authorized use do no harm to neighbors, nor economy of the County see also #s 14 and 16. This goal and rule in the plan, which of course is a basic tenet of humans everywhere, alone will preclude any siting approval. Of course this self serving, money grubbing, planet grinding---and worst of all, Unnecessary project, WOULD HARM NEIGHBORS. Any questions? The significant adverse Impacts and Harm has been well documented in other comments, but of course include 345 022 0080, and the documented concerns of the local relator association and it's members, as well of course of hundreds if not thousand of home-owners within sight of the proposed travesty (line), many of whom testified tot he Council in person or in writing, are testament to the economic and visual impacts. ors 469.470, 469.501 et al

pg 8 and 9 see 1 through 7 , note esp #6 "the natural beauty of Union County is worth preserving... 345 022 0080 IF this stupid un-needed massive line were gouged across Oregon so Idaho Power's shareholders could make a few dollars...more than \$70 Million profit... of course it should be sited on the BLM vetted, common-sense, Preferred route that would solve most of the many and severe problems encountered in Union County. Make them reapply and select that route for all the obvious reasons. Yes, you can make that happen. Applicable Substantive Criteria 345 022 0030

pg 9 and 19, #S 9 though 15 B2H proposed routes would diminish prime lands available for rural residential, esp in low productive areas. The applicant does not even address this economic impact in their proposal. Necessary for any site approval, plus mitigation. 345 022 0030, oar 660 006

pg 12 second paragraph from bottom ---non-urban industrialrecognition not compatible with urban uses and activities 345 022 0030 Would dramatically and significantly adversely impact La Grande and nearby rural areas. 345 022 0080

top of page 15 'Morgan Lake area seen as potential for farm/residential' 345 022 0030

pg 16 ,,even rural residences'do not interfere with open space....' B2H would interfere with 'open space'. 345 022 0030

pg 20 #6 ...east of Morgan Lake area potential rural residential.. 345 022 0030

pg 25 Landslide concerns.... In Bold in document **"Development may activate stabilized landslide topography"** (like deep blasting and deep digging, road construction, etc???) (In 1979 those local yokels who wrote this Plan sure had an idea what blasting and road construction could do.) 345 022 0020

pg 29, plan change, 'that public need supports the change.' The Public clearly does not support this line. Why would anybody?

pg 31 ag land conversion, see all of #3 A-E, and #4 345 022 0030 applies.

"that the rural character of and farming activities of agricultural uses will be protected to preserve the scenic attractiveness and economic social and physical living conditions desirable to farm families."

pg 32 goal 'to conserve forest land for forest uses"

All of #1 through 10 --- B2H would negatively effect ALL of them, but esp #7 and #10

#4 That before productive forest or range land is converted or classified to include other uses, it will be demonstrated that such areas are more needed by the area economy for those uses.

#7. That sustained timber yield will be encouraged, even by owners of small woodlots.

#10 That non-forest related development in and around timbered areas will not limit timber production, harvest, haul out, slash disposal, road construction, scarification, fertilization, pest or disease control or other timber management operations.

Applicant erroneously minimized impacts and economic damage to forest lands and mistakenly inventoried them ORS 469. 504, oar 660-006

pg 33 Goal "to conserve open space and to protect natural, cultural, historical and scenic resources." 345 022 0080 and 345 022 0030

#2 That the following concerns will be taken into account in protecting area visual attractiveness:

- a. Maintaining vegetative cover wherever practical.
- b. Using vegetation or other site obscuring methods of screening unsightly uses.
- c. Minimizing number and size of signs.
- d. Siting developments to be compatible with surrounding area uses, and to recognize the natural characteristics of the location.

345 022 0030, oar 660 006

#6, That development will maintain or enhance attractiveness of the area and not degrade resources. 345 022 0030 Do not approve application for this reason alone.

#7
That sites or structures that have local, regional, statewide, or national historical or cultural significance will be protected to the extent practical (like Oregon Trail...) 345 022 0090

pg 35 Air, Water and Land Resource Goal

1. That planning decisions will recognize immediate and long range effects on the quality of natural resource, and those uses which may likely have an adverse effect on resource quality will be prohibited. IP and fellow scammers want you to swallow the notion that this effectively permanent (yes, and unnecessary) scar across Oregon will not have long range effects. How stupid do they think we are? 345 022 0030, et al

2. That all local, State and Federal agencies will be required to comply with the same air, water, and land resource quality regulations as required of private interests. 345 022 0030

pg 36 Hazard areas

4. That landslide potential will be recognized in any development south or west of La Grande, and that development will be prohibited in areas of known active landslide activity. 345 022 0020, 345 022 0030

pg 37 Economy

3. That suitability of proposed industrial developments will be evaluated according, but not limited to, the following factors: availability of local labor force, materials and market locations, transportation,

service and other community costs, relationship to the environment and present economic base, and similar considerations. 345 022 0030, ors 469.470, 469.501, et al

#5 That industries which might likely have undesirable effects on housing conditions, service costs, school and other public facility capacities and similar consideration will be discouraged. So, Discourage it.

The list goes on. Some of these are certainly actionable in the Courts and are relevant and germane to current EFSC process. These are from our guiding document on Land Use --polices and laws. We can fight on these existing rules and laws and win. But only if you help us do it. Are we going to throw up our hands because a few out of state, wealthy corporations want to 'take' our land, our resources, or quality of life ---all to make a killing? Make no mistake, they do plan on 'taking' it...and to use eminent domain to do it. We are fighting. Will you?

Scores of Citizens of this fine County have spent countless hours ---truly countless. More time than you will ever spend on any issue. They have become reluctant experts. They deserve, yet more importantly the entire County and State full of Citizens, now and into the future, deserve, a representative government that actually values them and the local resources, respects their value and concerns, and efforts --- and will at least fight along side of them, not cave in to an out-of-state scammer.

Will you do your job to serve Oregon and Oregonians --- or will we Citizens be obligated by you and Idaho Power, to go to the Courts to seek fairness and justice... to protect our Great State? Step up to the plate, do your job, protect your neighbors. Protect this fine State from these ravages for now and long into the future.

Peter Barry
60688 Morgan Lake Road
La Grande, Oregon 97850

petebarry99@yahoo.com

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" ¹ specifically the Modelaire-Hawthorne Loop) ², hereafter referred to as the "loop", of La Grande to access the site entrance. This residential "loop" was constructed without sidewalks for a new development around the early 1960s.

According to OAR 345-022-0110, Public Services (pg. 5. April 2017) "The applicant...must address all permanent and temporary impacts of the facility on housing, traffic, safety, police and fire protection, health care and schools." ³

My impression from reviewing the application Page 17 ⁴ is that the applicant has not fully examined the final portion of the intended route nor does it fully recognize or address the need for traffic mitigation. This "loop" is the only access to/from thirty-six houses to the rest of the city. The area to the north of the "loop" is occupied by the Grande Ronde Hospital and Medical Clinic. Two blocks to the east is located the local high school and a grade school. ²

In June of 2016, the Grande Ronde Hospital petitioned the City to have a conditional use for a parking lot expansion project next to Hawthorne. The Conditional Use Permit was approved subject to the Condition of Approval that "No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to residential standards and is not designed to support commercial traffic." ⁵

The La Grande Director of Public Works, Kyle Carpenter, provided information regarding the widths for the streets in question. The two streets range from 33 feet to 37 feet in width with no sidewalks. I personally measured the area where the unpaved stem of Hawthorne leaves the "loop" to go up the hill. At the junction it measures 32 feet curb cut to curb cut and narrows to 18-21 feet in width as it goes around the corner up the hill. 6 The Public Works Director also provided pictures of the mapping system showing the existing utilities located in the "loop". 7-8. It should also be noted that from the entrance to the "loop" at Sunset Drive to the entrance of the site the road has a 16% grade.

Attachment U2 9 from the application shows an "Aerial Lift Crane to be Used During Construction" and the Transportation and Traffic Plan on page 19 10 lists a number of other vehicles anticipated to be used. Article 6.6 — Public Street Standards for the City of La Grande Section 6.6.002 states that "Collector Streets are designed to withstand normal trucks of an HS20 loading. Larger trucks are to utilize Arterial Streets where at all possible." 11 The majority of vehicles listed on page 19 exceed that limit and would be using a Local Street in addition to Arterial and Collector Streets. According to the Public Works Director the two streets in the "loop" were designed as Local Streets for residential use, able to accept the pressures of HS20 for the purpose of an occasional need such as a weekly garbage truck or an emergency vehicle but for no more than 5% of the time. The paving construction of these over 50 year old streets in the "loop" was not designed for repetitive use by vehicles heavier than a normal car. These streets in the "loop" have not been repaved, only patched when necessary, since they were first constructed.

The application does not address the "loop" specifically, but 3.1.2 (pg. 19) 10 and Table 6 (pg.17) 12 of the Transportation and Traffic Plan indicate there would be numerous vehicles using this route. Not knowing exactly just which vehicles would be on the "loop" daily but making a conservative estimate of 50 round trips (100 single) it would be a constant parade with one truck every 7.2 minutes. This is unacceptable for numerous reasons including constant excessive noise.

Not only would weight of the vehicles be a problem but the narrowness of the "loop" streets and the ninety degree blind curves that would have to be executed would be either impossible or extremely dangerous considering the turning radius for many of these large vehicles. The

already dangerous situation for a number of driveways that exit onto these "loop" streets at blind curves would be exacerbated. 13-14

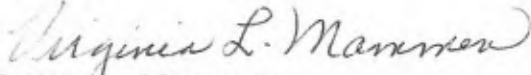
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for walking (children to school, all ages for physical training), driving, or biking. I fear there are standards that are either not being considered or they are intentionally being ignored. There should be some common sense, courtesy and respect for the impact this project would impose on any neighborhood.

Finally, La Grande Ordinance Number 3077, which adopted Oregon State Traffic Laws by reference, states in Section 17 page 8 "It shall be unlawful for any person, firm or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes." Neither Modelaire/Hawthorne Loop nor Sunset Drive are posted as truck routes. 15-16

A site review and traffic plan must be completed prior to the cite certificate being issued and not 90 days prior to construction as stated.

For the above reasons I oppose the usage of the proposed route for the construction of the B2H transmission line.

Sincerely,


Virginia L. Mammen
405 Balsa
La Grande, Oregon. 97850

gmammen@eoni.com

**TABLE 1
 STREET STANDARDS**

Functional Classification	ADT Volume	Speed (mph)	# of Travel Lanes	Travel Lane Width	Turn Lane or Median Width	Bike Lanes	Min. Bike Lane Width	On-Street parking
Downtown Arterial	10,000	20	2-3	11'	11'			both sides
Arterial	10,000	40-55	2-5	12'	4-14'	optional ⁴	5'	none
Major Collector	2,000 - 10,000	25-45	2-3	11'	12'	required	5'	one or both sides
Minor Collector	1,000 - 2,000	25-35	2	11'	none	Optional ⁵	5'	one or both sides
Local Street	0 - 1,000	15-25	2	10'	none	none	none	one or both sides

Functional Classification	Sidewalks	Min. Sidewalk Width	Planting Strip Width ¹	Total Paved Width ²	Total ROW Width ³	Private Access Spacing
Downtown Arterial	required	12'	3'6" ⁶	49'	80'	200'
Arterial	required	5'	8'	36'-72'	80'-102'	200' - 400'
Major Collector	required	5'	8'	52'-60'	62'-90'	150' - 300'
Minor Collector	required	5'	8'	30'-48'	60'-78'	75' - 150'
Local Street	required	5'	8'	28'-36'	40'-66'	Each Lot

¹ A portion of the required planting strip width may be used instead as additional sidewalk width or reduced right of way, as appropriate.

² The minimum of the paved width was calculated with the following assumptions:

Arterials: Two (2) travel lanes, four foot (4') median divider, no center turn lane, no bike lanes.

Major Collectors: Two (2) travel lanes, two (2) bike lanes, no center turn lane, parking on one (1) side.

Minor Collectors: Two (2) travel lanes, parking on one (1) side of street, no bike lanes.

Local Streets: Two (2) travel lanes, parking on one (1) side of street.

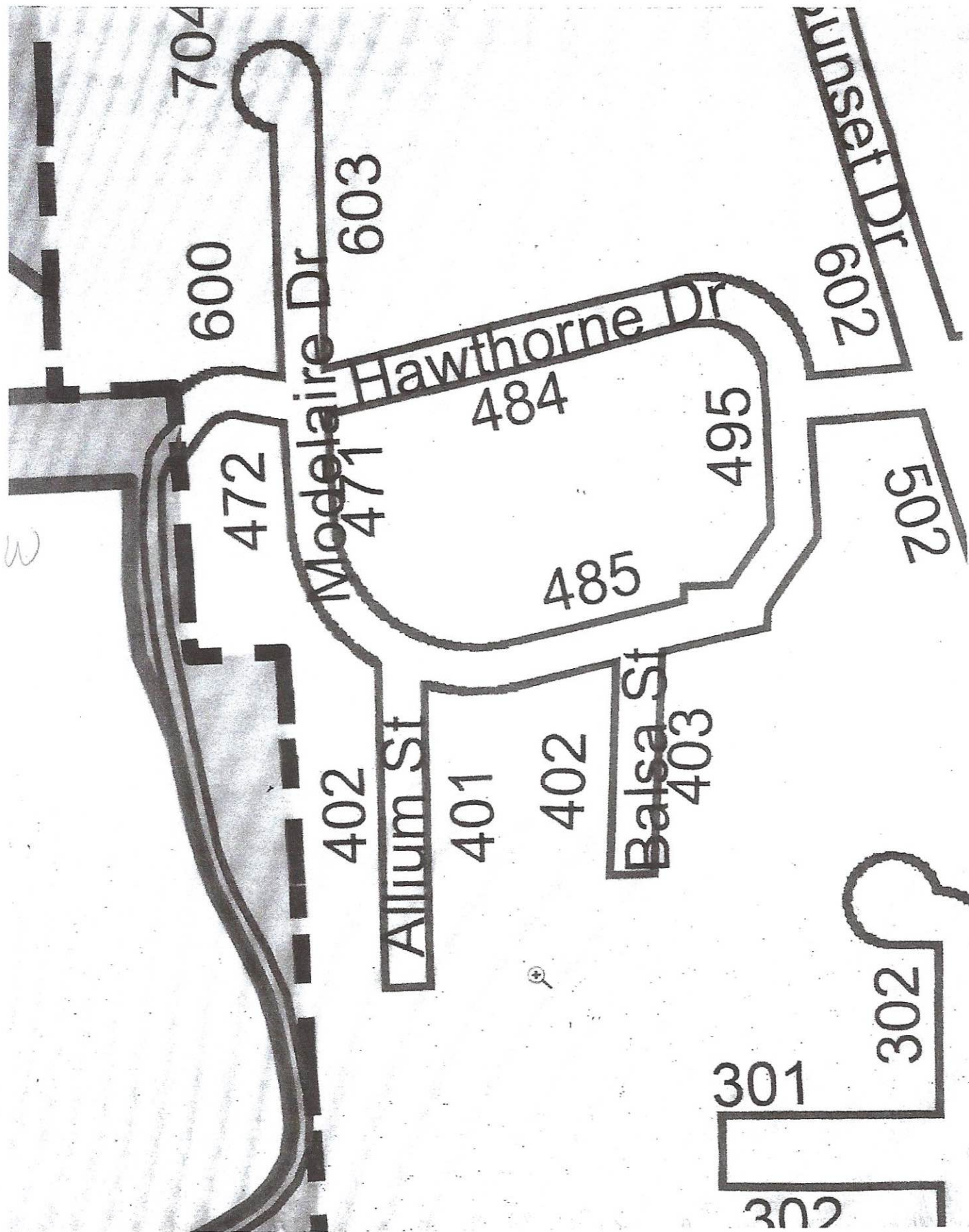
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

³ These right-of-way width ranges are for new streets.

⁴ Bike lanes should be provided on Arterials unless more desirable parallel facilities are designated and designed to accommodate bicycles.

⁵ Bike lanes should be provided on Minor Collectors where traffic volumes or other factors warrant. Otherwise, Minor Collectors should be designed and designated as shared roadway facilities with wide outside travel lanes of 14' on important bike routes.

N



5

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety. Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



Idaho Power Responses to Comments and Requests for Additional Information on the B2H ApASC
from the City of La Grande
Compiled by ODOE. RAI's from the City of La Grande and Responses from IPC

		proposed helipad is a necessary supporting facility.	
U	U- Public Services include utilities such as road systems, water, sanitation services, power, and other amenities necessary for the construction.	Ordinance #2912, Series 1997 gives the City jurisdiction and control on all City street rights-of-way and Ordinance #3077, Series 2009, establishes the process and requirements for permits and licenses for uses of the streets that are not normal uses and may result in damages.	<p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p> <p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><u>Land Use Condition 9: Prior to construction in Union County, the site certificate holder shall complete the following to address traffic impacts in the county:</u></p> <p><u>a. The site certificate holder shall finalize, and submit to the department for its approval, a final county-specific transportation and traffic plan. The protective measures described in the draft Transportation and Traffic Plan in ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</u></p> <p><u>b. The site certificate holder shall work with the Union County Road Department and the City of La Grande Public Works Department to identify concerns related to Project construction traffic; and</u></p> <p><u>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</u></p> <p><u>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</u></p>

IV. CONCLUSIONS

Based on the Findings of Fact above, the Planning Commission concludes that the application meets the requirements established in LDC Articles 8.5 and other applicable codes and Ordinances.

V. ORDER AND CONDITIONS OF APPROVAL

Based on the conclusions above, the Planning Commission approves the Conditional Use Permit as requested, subject to the following Conditions of Approval:

1. No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to a residential standards and is not designed to support commercial traffic.
2. Any existing driveway curb cuts along Hawthorn Drive bordering GRH's property, that are not used for residential purposes, shall be removed and replaced with City standard improvements that exists adjacent to such areas.
3. There is a storm sewer line extending through the project area that shall to be protected. Any improvements that may affect the storm sewer line shall be reviewed and approved by the Public Works Director.

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

1. **Revisions to a Valid Conditional Use Permit:** Any variations, alterations, or changes in a valid Conditional Use Permit requested by the deed holder shall be considered in accordance with the procedures of the Land Development Code as though a new Conditional Use Permit were being applied for.
2. **Public Works Standards:** Where a development involves work within the public right-of-way, a Right-of-Way Permit shall be obtained from the Public Works Department in advance of commencing with any work in the right-of-way. All improvements within the public right-of-way shall be in conformance with the most recent adopted City of La Grande "Engineering Standard Drawings and Specifications for Construction Manual."
3. **Building Permits:** The City of La Grande Building Department shall be contacted early in the process and in advance of development to coordinate and obtain required building, plumbing, electrical and/or mechanical permits. All required permits shall be acquired in advance of construction.

VI. OTHER PERMITS AND RESTRICTIONS

The applicant and property owner is herein advised that the use of the property involved in this application may require additional permits from the City of La Grande or other local, State or Federal Agencies.

The City of La Grande land use review, approval process and any decision issued does not take the place of, or relieve the applicant of responsibility for acquiring such other permits, or satisfy any restrictions or conditions thereon. The land use decision herein does not remove, alter, or impair in any way the covenants or restrictions imposed on this property by deed or other instrument.

The land use approvals granted by this decision shall be effective only when the rights granted herein have been exercised and commenced within one (1) year of the effective date of the decision. In case such right has not been exercised and commenced or an extension obtained, the approvals granted by this decision shall become null and void. A written request for an extension of time shall be filed with the Planning Department at least thirty (30) days prior to the expiration date of the approval.



Virginia Mammen <4gmammen@gmail.com>

Modelaire Roadway Specifications

3 messages

Kyle Carpenter <KCarpenter@cityoflagrande.org>
To: "gmammen@eoni.com" <gmammen@eoni.com>

Fri, Jul 12, 2019 at 1:51 PM

I have attached a couple pictures of our mapping system that will give you a sense of where existing utilities are in Modelaire and Hawthorne. As for the widths of the roadways, I took measurements in multiple places, and found the following:

- Modelaire Drive (F Avenue) between Sunset Blvd and Hawthorne Drive is approximately 33 feet wide with a grade of about 5 Percent.
- Hawthorne Drive is approximately 32 feet wide at the bottom near the intersection of Modelaire/F Avenue and widens to about 34 feet where it intersects Modelaire at the top of the hill. The grade heading up hill is approximately 15.5 Percent.
- Modelaire Drive is generally 36 feet wide with some minor variability generally less than a foot (35' to 37'). On the southernmost segment of the roadway where the majority of the elevation gain is observed the grade is approximately 16 Percent.

Let me know if there are any other specifications of these roadways that you are interested in that I have missed. Have a great weekend and thanks for the treats, the guys were very appreciative.

Kyle Carpenter, PE

Public Works Director

City of La Grande

Public Works

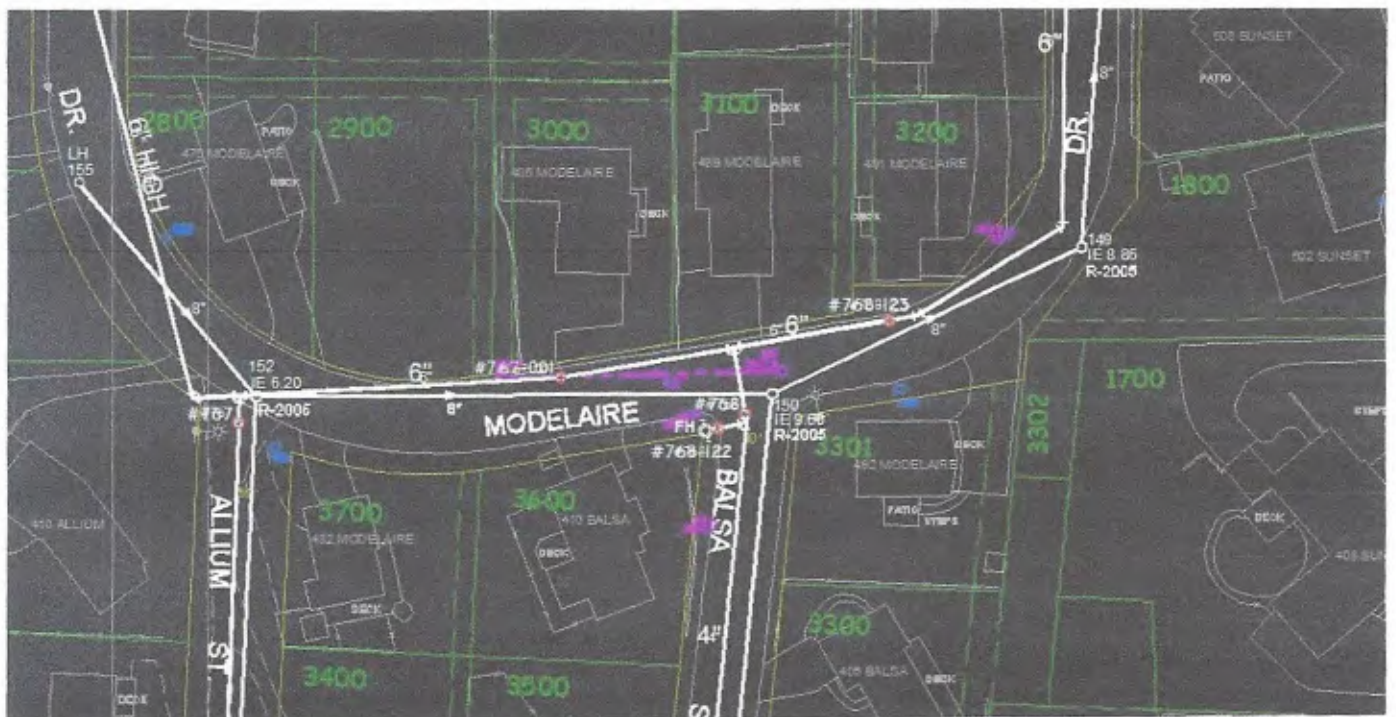
Ph: (541) 962-1325

Fax: (541) 963-4844

2 attachments

Hawthorne.jpg
150K

Modelaire.jpg
120K





attachment U2

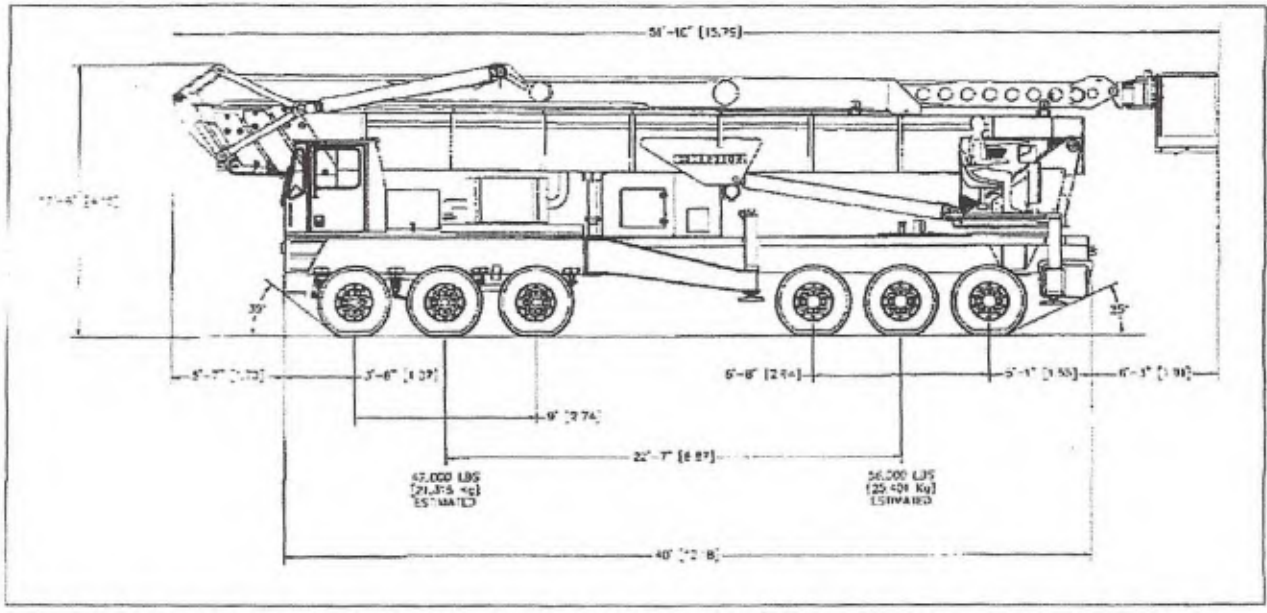


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

The following is a summary of anticipated equipment to be used for each transmission-line construction activity.

- Survey work: pickup trucks or ATVs.
- Timber removal: pickup trucks, feller bunchers, dump trucks, wood chippers.
- Road construction: pickup trucks, bulldozers, motor graders, and water trucks.
- Hole digging, installation of directly embedded structures, or foundation installation: pickup trucks, 2-ton trucks, digger derrick trucks, hole diggers, bulldozers, concrete trucks, water trucks, cranes, hydro cranes, wagon rock drills, dump trucks, and front-end loaders.
- Hauling lattice steel members, tubular poles, braces, and hardware to the structure sites: steel haul trucks, carry alls, cranes, and forklifts.
- Assembly and erection of structures: pickup trucks, 2-ton trucks, carry alls, cranes, and a heavy lift helicopter.
- Wire installation: pickups, wire reel trailers, diesel tractors, cranes, 5-ton boom trucks, splicing trucks, three drum pullers, single drum pullers, tensioner, sagging dozers, carry-alls, static wire reel trailers, bucket trucks, and a light duty helicopter.
- Final cleanup, reclamation, and restoration: pickup trucks, 2-ton trucks, bulldozers, motor graders, dump trucks, front-end loaders, hydro-seed truck, and water trucks.

The highest level of traffic will be when the wire stringing operations begin while several other operations are occurring at the same time, which will likely include ROW clearing, installing foundations, hauling steel, and assembling and erecting structures. For the station work, the highest level of traffic will be during site grading and foundation installation. For the communication station sites, the highest level of traffic will be during grading and site preparation.

Detailed estimates of trips generated by transporting Project construction equipment will be provided by the construction contractor prior to construction.

3.1.3 Traffic Related to Timber Removal

In forested areas, the Project will require removal of timber from the Project ROW and for construction and improvement of access roads. Specific timber harvest plans have not been finalized. Logs from timber clearing may be transported to nearby sawmills. Decisions regarding transportation routes for harvested timber will be made following completion of a timber harvest plan, and the number of log truck trips will be estimated when the timber harvest plan has been finalized. Logging slash will remain onsite if possible. For additional discussion regarding removal of timber in forested areas, see Exhibit K, Attachment K-2, ROW Clearing Assessment.

3.1.4 Impacts to V/C Ratios

Based on the estimated trip generation numbers in Tables 4 and 6, a maximum of approximately 1,294 daily one-way vehicle trips are expected within any one construction spread. To facilitate traffic and other analyses, the two construction spreads are divided into smaller sections based on similar construction windows and seasonal weather restrictions. Not all construction sections will have the same number of concurrent construction activities, depending on how the construction contractor sequences and executes the Project. Some sections will have fewer daily vehicle trips. For the purposes of the traffic analysis, the spreads are divided into five sections with multi-use areas that could have additive traffic impacts. The sections are assumed to have approximately equal levels of activity. The 1,294 daily one-way trips per spread divided over five sections of more concentrated traffic results in 259 daily one-

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

Upon the request of the La Grande City Council, a variety of street design standards have been reviewed and are now incorporated in the Land Development Code.

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

This classification will cover those streets that are designed to meet the standards for an expected life of twenty (20) years or more. The attached drawings shall be the minimum standard for those streets in this classification. All streets designated as Federal Aid Urban Streets (F.A.U.) shall be constructed under these design standards. Streets in this designation shall be constructed with sidewalks when at all possible in an effort to increase pedestrian safety. Collector streets are designed to withstand normal trucks of an HS 20 loading. Larger trucks are to utilize Arterial streets where at all possible. This level of development shall be the ultimate goal for all streets within the City of La Grande.

Possible means of financing available for this Class shall be methods A, B, C, D, E, F, G, and H in Section 6.6.006.

A. Advantages

1. The construction life is extended to a period above other City standards.
2. The visible aesthetics in relationship to having curbs and a blacktop surface with landscaping or concrete driveways and a sidewalk is generally appealing to the public.
3. Easy maintenance for the Public Works Department for cleaning and minor repair.
4. Storm sewer drainage is confined within the bounds of the curbs during minor flooding periods.
5. Parking is restricted to a solid barrier, that being the curb; this restricts parking in the area on the back side of the curb and confines travel to the street surface.
6. Defined areas for possible cross walks, signs, power poles, and other utilities that are restricted to the outside areas behind the curbs.
7. It allows for a wide range of financing methods and is to City standards for a ten (10) year Bancroft bonding.
8. Provides a dust free surface.

B. Disadvantages

1. The extreme high level of cost that is incurred with this type of development.

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

Streets constructed in this classification shall be constructed to the same standards as Class I Streets with the exception of the form of drainage system. These streets shall meet the standards as shown on the attached drawing. This level of construction shall be only utilized in substitution for Class I Streets when it is determined by the City Council at the recommendation of the City Engineer or Engineering Superintendent, that an adequate drainage system cannot be installed for a Class I Street.

Table 6. Construction Vehicle Trips per Day per Construction Spread

Construction Crew Type	Construction Vehicles					
	Light Construction Vehicles			Heavy Construction Vehicles		
	Number of Pickups/ Mechanic Trucks (per day)	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)	Number of Other Vehicles	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)
Substation Construction	20	2	40	5	2	10
ROW Clearing	9	4	36	5	4	20
Roads/ Pad Grading	9	4	36	9	2	18
Foundations	9	2	18	5	8	40
Tower Lacing (assembly)	27	2	54	0	0	0
Tower Setting (erection)	20	2	40	0	0	0
Wire Stringing	9	4	36	9	4	36
Restoration	3	2	6	0	0	0
Blasting	5	4	20	0	0	0
Material Delivery	20	8	160	12	2	24
Mechanic and Equipment Mgmt.	5	6	30	0	0	0
Refueling	0	0	0	5	4	20
Dust Control	0	0	0	5	4	20
Construction Inspection	5	8	40	0	0	0
Concrete Testing	5	4	20	0	0	0
Environmental Compliance	9	6	54	0	0	0
Surveyors	5	3	30	0	0	0
Totals	—	—	620	—	—	188

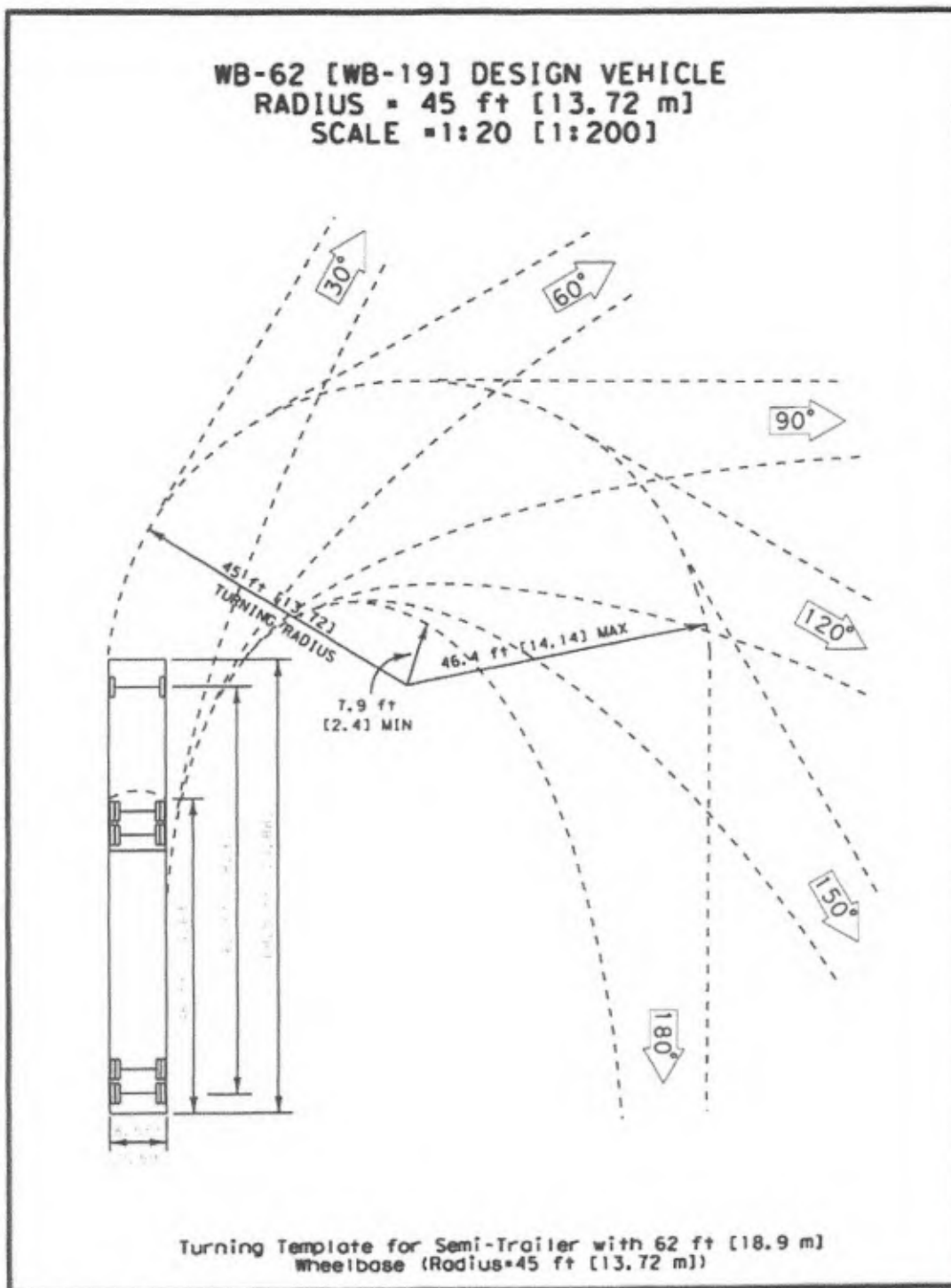
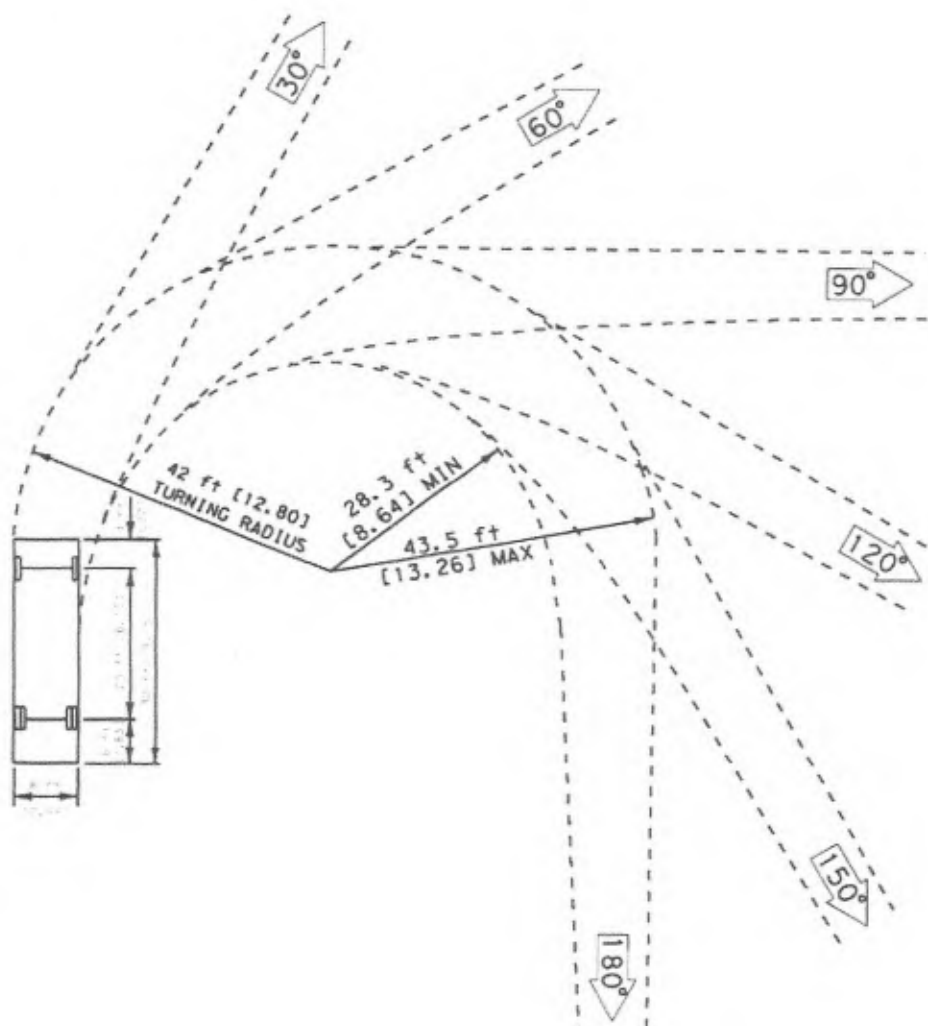


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

SINGLE UNIT (SU) TRUCK DESIGN VEHICLE
TURNING RADIUS = 42 ft [12.80 m]
SCALE = 1:20 [1:200]



Turning Template for Single Unit Trucks or Buses

Exhibit 15

**CITY OF LA GRANDE
ORDINANCE NUMBER 3077
SERIES 2009**

**AN ORDINANCE CONTROLLING VEHICULAR AND PEDESTRIAN TRAFFIC, PARADES
AND PROCESSIONS AND ISSUANCE OF PERMITS; PROVIDING PENALTIES; AND
REPEALING ORDINANCE NUMBER 2845, SERIES 1993; ALL AMENDING ORDINANCES
AND ALL OTHER ORDINANCES OR PARTS OF ORDINANCES IN CONFLICT HEREWITH;
AND DECLARING AN EFFECTIVE DATE**

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

Section 1. This Ordinance may be cited as the City of La Grande Uniform Traffic Ordinance.

Section 2. APPLICABILITY OF STATE TRAFFIC LAWS.

Oregon Revised Statutes, Chapter 153, and the Oregon Vehicle Code, ORS Chapter 801 and 822, as now constituted, are adopted by reference. Violation of an adopted provision of those chapters is an offense against the City.

Section 3. DEFINITIONS

In addition to those definitions contained in the Oregon state Motor Vehicle Code, the following words or phrases, except where the context clearly indicates a different meaning, shall mean:

a. Alley

A street or highway primarily intended to provide access to the rear or side of lots or buildings in urban areas and not intended for through vehicular traffic.

b. Bicycle

A bicycle is a vehicle that:

1. Is designed to be operated on the ground on wheels;
2. has a seat or saddle for use of the rider;
3. is designed to travel with not more than three (3) wheels in contact with the ground;
4. is propelled exclusively by human power; and,
5. has every wheel more than fourteen inches (14") in diameter or two (2) tandem wheels, either of which is more than fourteen inches (14") in diameter.

c. Bicycle Lane

That part of the highway, adjacent to the roadway, designated by official signs or markings for use by persons riding bicycles, except as otherwise specifically provided by law.

d. Bicycle Path

A public way, not part of a highway, which is designated by official signs or markings for use by persons riding bicycles, except as otherwise specifically provided by law.

e. Block

The part of one side of a street lying between the two (2) nearest cross streets.

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

The applicant shall submit an application to the City Manager or designee, showing the terminal points of the purported movement; the proposed route; the nature of the movement requested, including the weight and dimensions of the vehicle, load, machine, building, or structure to be moved; the time, date and duration of the proposed movement.

b. Special Movement Permit

A permit shall be required to move any vehicle, structure, or load on, or to access a street when, after preparation for movement, the vehicle, structure or load exceeds fourteen feet (14') in height, requires the use of guy wires, or could result in the blockage of a street. An approved application may serve as a permit, and a copy of the approved application shall be provided to the applicant.

Section 17. TRUCK ROUTES

- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, pounds specifically picking up deliveries or making deliveries to any business or residence located on a street that is not a truck route will be exempted if the vehicle is driven from the truck route to the destination in the shortest, most direct, and safest route.
- c. The use of Jacob brakes shall not be allowed within the city limits of La Grande, Oregon.
- d. Truck routes will be posted as follows:
 1. Walnut street north from the city limits to C Avenue;
 2. C Avenue east from Walnut Street to Gekeler Avenue;
 3. Gekeler Avenue east to the city limits;
 4. 12th street south from Gekeler Avenue to the city limits;
 5. 2nd Street south from the city limits to Adams Avenue;
 6. Monroe Avenue east from Spruce Street to Highway 82;
 7. Jackson Avenue east from Spruce Street, and
 8. Spruce Street south from the city limits to Monroe.

Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement officer may cause the vehicle to be towed and stored at the owner's expense. The owner shall be liable for the costs of towing and storing, notwithstanding that the vehicle was parked by another or that the vehicle was initially parked in a safe manner but subsequently became an obstruction or hazard.

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

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SIGNATURE

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Jessie Huxell
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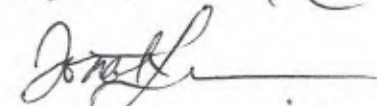

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John Garutz

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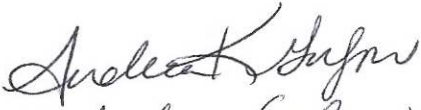
John Garutz


ADDRESS


484 Hawthorne LG, OR 97850


EMAIL


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I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE: 

PRINTED NAME Shawn K. Mangum

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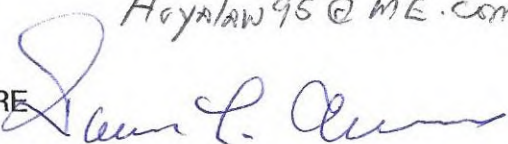
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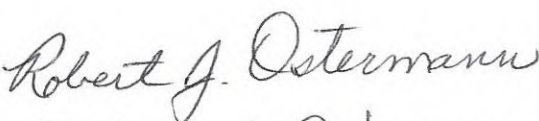

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Robin J. Ostermann
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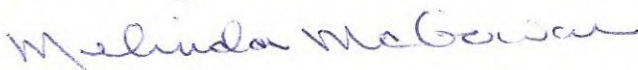
ADDRESS 1509 MADISON AVE LaGrande, OR 97850


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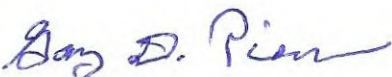
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I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

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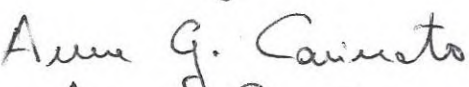
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EMAIL jeanfreewing@gmail.com

SIGNATURE *Lindsey McCullough*
PRINTED NAME Lindsey McCullough
ADDRESS 406 Balsa St., La Grande, OR 97850
EMAIL lindz_mm91@hotmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE *Merle E. Comfort*
PRINTED NAME MERLE E. COMFORT
ADDRESS 209 SCORPIO DRIVE LA GRANDE OR 97850
EMAIL merlecomfort@gmail.com

SIGNATURE *Robin L. Maille*
PRINTED NAME Robin Maille
ADDRESS 401 Cedar St., La Grande
EMAIL r-maille@icloud.com

SIGNATURE *Bruce C Kevan*
PRINTED NAME *Bruce C Kevan*
ADDRESS 1511 W Ave LG
EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Bekeler Ln - La Grande, OR
EMAIL carolsummers1938@gmail.com

SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 4th St. LaGrande - OR 97850
EMAIL

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
ADDRESS *406 4th St. LaGrande, PR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

ESTERSON Sarah * ODOE

From: Ellen Barton <elbarton3@frontier.com>
Sent: Wednesday, August 21, 2019 5:54 PM
To: B2H DPOComments * ODOE
Subject: B2H Comment Letter: Personal concerns regarding this project

August 21, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St. NE

Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

I have personal concerns regarding the proposed Boardman to Hemingway Transmission Project. I live on Walnut Street at the south end of La Grande just as the road enters the canyon to Morgan Lake and other forest residential and recreational areas. I have lived here for over 30 years. During that time, I have noted that the hillside across the street from my home has displayed instability in that small slumps and slides have occurred. It is known to the community that a fault line traverses this area, causing movement in homes and buildings such as the Grande Ronde Hospital on Sunset Drive. Should there be construction including blasting in the area, I am concerned that this will exacerbate earth movement and stability of the slopes above this area of town.

After the Oso, Washington slide, I accessed a geology site that showed historic landslides in this area. The possibility of a landslide in this area of our community was a distinct possibility, especially if triggered by events such as earthquakes or blasting.

I also have personal concerns of the traffic entailed in the construction of this transmission line project. The Morgan Lake Road carries a significant amount of traffic, both from people accessing the recreational opportunities of Morgan Lake and other activities such as cross country skiing, snowmobiling, etc., and those people traveling to and from their residences in this area. Should this project be approved, the increased traffic by large equipment would be more hazardous than it already is.

Finally, I have no desire to view several large towers crossing my view of the mountains and valley where I live. The information available indicates that this transmission line is not only unnecessary but will be obsolete when it is completed. Residents of the Grande Ronde Valley and other communities in Oregon will have no benefit from the line and will only have the eyesore of towers and hazards of fire, slope instability, traffic hazards during construction.

I urge the Energy Facilities Siting Council to deny this project.

Sincerely,

Ellen Barton

91 Walnut

La Grande, OR 97850

E-Mail: elbarton3@frontier.com

TARDAEWETHER Kellen * ODOE

From: Don Beck <donbeck@donbeckbronzes.com>
Sent: Friday, July 12, 2019 2:55 PM
To: TARDAEWETHER Kellen * ODOE; odoe@service.govdelivery.com
Cc: David Yeakley; comment@boardmanto hemingway.com; bharvey@bakercounty.org; Greg Smith; Greg Smith; Senator_Merkley@Merkley. senate. gov; senator_wyden@wyden.senate.gov; SEN Bentz; REP Findley; mbennett@bakercounty.org
Subject: [Fortimail Spam Detected] FW: In opposition to B2H Idaho Power proposed route through Baker County

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy

Dear Sir/Madam:

Re: Public Comment Deadline Extension and Transcripts Available on Proposed Boardman to Hemingway Transmission Line

Comment for the Record:

It is time that Public Utilities become more interested in safety of Human lives, private and commercial property and our natural resource Timber (Forests) and rural community economic resources in light of the horrific death toll caused by Forest Fires resulting from Utility Company faulty Power Lines and Equipment such as Pacific Gas & Electric Company infrastructure that caused the deadly "Camp Fire" in Northern California town of Paradise and outlying communities.... Please view my herein correspondence with a Utility Company who is familiar with HVDC Power Transmission of energy with much Less loss of energy along the transmission route and safer for people, animals; domestic and wildlife, property and our Valuable Timber resource, our Forests. This newest technology is being used all around the world today with success and offers the most safest method of transmission of power energy with less Loss of energy, Waste of Energy along the transmission line.

There are better alternatives today, both in underground and/or HVDC Power Transmission lines than current HVAC, with no hazardous EMF danger. Power Energy Corporations and government oversight agencies must take into account the latest 21st century technology available today to protect Human Lives, Commercial and Private Property and protect our valuable Timber, our Forests, against such Preventable tragedies....not to mention citizens health related problems caused by all the smoke from these fires over the obstinate Big Energy Corporation's only concern for their bottom line utilizing the most least expensive routes and installation methods available today with no concern or regards for the public health & rural Oregon Communities. The savings of loss of energy along these long routes is not considered in costs as these costs are passed on to the consumer...less loss of energy/wasted energy is a huge savings to the consumer and if absorbed by the Power Energy Corporations they would be encouraged to find better alternatives. Lives are more valuable than dollars.

Human lives, private property, rural communities and our valuable forest timber resources must be first priority...cheapest is not always cheapest when seeing the devastation and the Cost Burden now facing Pacific Gas & Electric Company of California, not to mention all the personal suffering of victims.... Oregon is not

exempt from such disasters and is a ticking time bomb that all will be responsible for by ignoring the potential of other such fires in rural Oregon. There have been several California forest fires triggered by Pacific Gas and Electric Company's Power Energy Transmission lines and failed infrastructure and these are not limited to California.

Thank you for your time and consideration.

Respectfully,
Donald R. Beck
Baker City, OR 97814

Don Beck Bronzes

Visit our on-line Gallery: <http://www.donbeckbronzes.com/>

email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

Baker City, OR 97814

~ "Truly my soul silently waits for God; From Him comes my salvation. He only is my rock and my salvation; He is my defense; I shall not be greatly moved" Psalm 62:1-2

From: dyeakley@charter.net [mailto:dyeakley@charter.net]
Sent: Friday, July 12, 2019 1:14 PM
To: 'donbeck@donbeckbronzes.com' <donbeck@donbeckbronzes.com>
Subject: RE: In opposition to B2H Idaho Power proposed route through Baker County

Have you sent this to the Energy Facility Siting Council? Input is due by July 23, and you could forward this information to:

B2H.DPOComments@Oregon.gov

I took the council standards, and went through them to show why the line should not be built.

Take care.

From: "Don Beck"
To: bharvey@bakercounty.org
Cc: "David Yeakley", "Cliff Bentz", "Congressman Greg Walden", "Greg Smith", "Greg Smith"
Sent: Monday February 4 2019 4:23:16PM
Subject: RE: In opposition to B2H Idaho Power proposed route through Baker County

Dear Commission Bill Harvey:

Greetings and Happy New Year! For the record and for your information as well as those working on the opposition of the BH2 Idaho Power transmission line I would like to forward to you the information that I received to my inquiry as to the best solution for installation and long term feasibility & safety of HVDC power verses HVAC power the current method of transportation. HVDC would not present the EMF human safety

affects nor the potential of forest fires, like what transpired by the Californian P.G.&E. Co of California which is now in bankruptcy due to "CAMP FIRE" where complete towns, communities of nearly 3000 commercial buildings/businesses and 14,000 residential homes were destroyed and took **88 lives**
<https://www.cbsnews.com/live-news/california-fires-containment-search-rescue-air-2018-11-22-camp-woolsey-paradise-live-updates/> This is a very Important aspect of the problem with HVAC overhead power lines. Communities and Lives are put at risk and we cannot afford to ignore this potential in Baker County just to allow Idaho Power to dictate their most economically based installation methods, which does not take into consideration the Power Loss along the entire distance of the Transportation of Power. It is not a matter of if, but when! As you investigate P.G. & E.'s account or record this was not the first nor only accounts of their facilities causing loss of life, forests and property, just the straw that broke the camel's back. They have been proven to lie when investigations that occurred in support of their faulty facilities on numerous occasions. Money should not dictate objectives over the Lives and Communities, Towns and Forests.

With the newest and latest advancement technology age that we now live in there are better, safer and more efficient ways of doing business and the Big Electric Corporation should respect the lives and communities that they want to just mow through thinking of and only putting the dollar first and now, before lives and loss revenue due to Power Loss along these lines annually.

After considering my questions in the correspondence below and the contact I was given for further answers of my questions perhaps you could forward this information to whomever is in the position for the County to represent the opposition to B2H Idaho Power proposed route through Baker County to Boardman, OR so that they can be equipped with questions that need answers and follow through with the best method for our community in best interest of Baker County citizen's lives, property owners, including safety from EMF affects then present findings to Idaho Power.

Thank you Bill, and all the best to you. We greatly appreciate your leadership.

Best regards,
Donald Beck

[Don Beck Bronzes](#)

Visit our on-line Gallery: <http://www.donbeckbronzes.com/>

email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

~ "And He hath put a new song in my mouth, even praise unto our God: many shall see it, and fear, and shall trust in the LORD" Psalms 40:3

From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]

Sent: Monday, February 4, 2019 3:02 PM

To: donbeck@donbeckbronzes.com

Subject: RE: HVAC vs. HVDC

Donald,
I'd say 400 + miles as the threshold of cost/benefit for HVDC

From: Don Beck <donbeck@donbeckbronzes.com>

Sent: Monday, February 04, 2019 4:10 PM

To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>

Subject: RE: HVAC vs. HVDC

EXTERNAL

Thank you Tony: One last question what is considered long distance? We are talking about 400 miles here.

Thanks,
Donald Beck

Don Beck Bronzes

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tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

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From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]

Sent: Monday, February 4, 2019 1:23 PM

To: donbeck@donbeckbronzes.com

Subject: RE: HVAC vs. HVDC

Donald,
ISO is an independent system operator, and as Oregon does not have its own, the California ISO is the closest one and would be more geographically relevant than our Midwest system operator.

Due to the complexity of HVDC systems, I'd not expect HVDC to be the future of HV overhead lines...my perspective is HVDC overhead makes sense for long distances with a dedicated purpose. Outside of the United States, HVDC (non-classic technology) is being utilized for under water and other unique applications...EPRI would be a great resource here!

Thanks,
Tony Ramunno

From: Don Beck <donbeck@donbeckbronzes.com>

Sent: Monday, February 04, 2019 3:07 PM

To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>

Subject: RE: HVAC vs. HVDC

EXTERNAL

Hi Tony:

I understand fully, the internet is a great too, but with it comes all the need for protection filters.

I wanted to question your suggesting contacting California ISO, not knowing what this stands for my question is do you think they would cover the state of Oregon, or mistype? If, so would you have a contact for state of Oregon?

From your own perspective is HVDC the future of HV overhead lines? Any pros and cons that you can share?

Thank you again Tony.

I appreciate your getting back with me and all the assistance provided.

Best regards,
Donald Beck

Don Beck Bronzes

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email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

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From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]

Sent: Monday, February 4, 2019 12:41 PM

To: donbeck@donbeckbronzes.com

Subject: RE: HVAC vs. HVDC

Donald,
Apologize for not getting back to you, these e-mails got snagged in our spam filter.

Glad you enjoyed our article in T&D...You ask some great questions below! The work we have done here at Great River Energy has been focused on age and condition analysis of the existing system for long-term reliability. We worked through MISO, our regional system operator, relative to broader applicability “upgrade analysis” portion, and utilize EPRI’s (Electric Power Research Institute) HVDC sector for applied research. Similarly, our contacts at ABB are project management, transformer replacement, and engineering and design for “retrofit” projects.

My suggestion would be to reach out to California ISO, as they would be able to provide the HVDC vs HVAC analysis criteria and financial thresholds. Not sure if EPRI would be very helpful outside it’s utility membership, however, that would be another source of excellent information.

Thanks,
Tony Ramunno

From: Don Beck <donbeck@donbeckbronzes.com>

Sent: Thursday, January 31, 2019 2:30 PM

To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>

Subject: HVAC vs. HVDC

EXTERNAL

Hi Tony:

How are you? I am following up on my earlier request below which I sent the first of this month requesting some information as to HVDC comparisons with HVAC electric transmission lines. I know you have a busy

schedule and perhaps impacted with all the cold weather. However, I was wondering if you will be able to assist me in this information? And if not, can you direct me to a source within your company to assist me and our county commissioners in this matter?

I would appreciate any assistance you may offer us or contact source for the information listed.

Thank you Tony, for your time and assistance in this matter. Have a Blessed day!

Best regards,
Donald Beck

Don Beck Bronzes

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email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

~ “And He hath put a new song in my mouth, even praise unto our God: many shall see it, and fear, and shall trust in the LORD” Psalms 40:3

From: Don Beck [<mailto:donbeck@donbeckbronzes.com>]

Sent: Wednesday, January 9, 2019 12:56 PM

To: 'tramunno@greenergy.com' <tramunno@greenergy.com>

Subject: HVAC vs. HVDC

Great River Energy www.greatriverenergy.com

Att: Tony Ramunno

Dear Tony:

Hi, I have a few questions that I would appreciate some help with. I received an email from T&D World which sparked my interests and having gone to their website <https://www.tdworld.com/overhead-transmission/reliability-upgrade-hvdc-system> I viewed an article on your project “Great River Energy’s HVDC system is made up of a 436-mile (702-km), 400-kV transmission line and two converter stations”.

I would like some technical advice and suggestions as to the HVDC verses the HVAC. I have 15 years’ experience working for Pacific Gas & Electric Co. of California in the 60-70’s. I currently live in the Pacific Northwest in the state of Oregon and an out of state Electric Power Utility Company has proposed installing a 500KV HVAC Overhead Power Transmission Line approximately 300 miles though Oregon. With the potential of forest fires due to any faulty equipment through the forests like was experienced recently in Paradise, CA “The CAMP FIRE” where complete towns, communities of nearly 3000 commercial buildings/businesses and 14,000 residential homes were destroyed and took 88 lives <https://www.cbsnews.com/live-news/california-fires-containment-search-rescue-air-2018-11-22-camp-woolsey-paradise-live-updates/> . Due to this most recent Tragedy and not considering the other fires attributed to this utility company facilities, I was interested in the best and safest method of infrastructure and installation moving forward such as Underground and/or Overhead 500KV HVDC verses Overhead 500KV HVAC Power Transmission Lines?

I am looking for comparison of Installation Facilities and Construction Methods of HVAC and HVDC power transmission. The Best Transmission Infrastructure equipment (facilities) information for the most Safest, Cost Effective and most Conservative means of energy transmission from point A to point B (with less line energy loss along the route) utilizing the new Advanced Technology of HVDC verses utilizing the Past and current methods/facilities of Overhead Line Transmission of 500KV HVAC Energy. Conservation of energy loss and Safety being of greatest importance as well as startup cost difference and long range savings. According to the Power Company it is my understanding with the past and current methods of overhead HVAC that 30% of electric energy is Lost along these long distance overhead power transmission lines. Another concern is the private property owners fear for health and human safety concerns from EMF near to their homes and farm lands with workers working in and around the high voltage lines. Not to mention the rights of way easement litigation and long periods of time for public meetings and approval prior to starting construction which all add up to substantial costs associated with 500KV HVAC Overhead Line Construction. All considerations taken into account I feel that there must be a better alternative to the past installation methods, facilities and construction procedure with all the latest new Advanced Technology of installation and construction of 500KV HVDC power lines, overhead and/or underground.

1. Taking into account of all the New Advanced Technology how does the HVDC Transmission lines differ from current 500 KV High Voltage A/C Lines; cost of installation, methods, safety (EMF's)? Including, above ground or below ground infrastructure potential?
2. Health Risks near installed high voltage 500KV HVAC overhead lines verses 500KV HVDC lines?
3. Costs and savings for installation, facilities and maintenance of HVAC High Voltage verses HVDC High Voltage Transmission infrastructure? Both short term and long term.
4. Cost savings due to 500KV HVAC Line leakage; overall line energy loss in 300 mile distance compared to 500KV HVDC?
5. Are fewer high voltage lines required with either method of transmission, so that more lines could be added in the future to existing electric grid corridor?
6. Best Infrastructure System through Farm Lands, Private Property, Rural Communities, Towns and aesthetics in Historic Site areas, Tourism and with improved public relations and potential for public support rather than concerns for health related issues and other negative impacts, including potential cause of forest fires. As we can see even the risk for the potential of one forest fire by faulty power company's equipment can outweigh the savings of the entire cost of installation of any proposed overhead 500KV HVAC Power Transmission Line to the Electric Utility Power Company, not to mention private property and human life.
7. In addition perhaps you could put me in contact with someone at www.abb.com if you feel that they could be of further assistance to us.

Being a retired PG&E Construction employee from Northern California with the installation experience in 500KV HVAC Power Transmission and distribution lines with this new era of Advanced Technologies I would like to know the Best alternatives today in comparisons of construction methods of the Past use of overhead HVAC Power Transmission Lines verses HVDC Power Transmission Lines and the feasibility of Underground verse Overhead infrastructure?

Our goal is finding a solution with less impact on health and safety of our citizens, small Rural Communities, Towns, Private Property, Exclusive Farm Lands and Historic Sites in Oregon, which includes to help eliminate the negative impact associated with AC 500KV HVAC Power Transmission Lines and their unsightly 200' Structures in a Tourist region. Public relations by working with locals would be beneficial to all parties and would insure shorter start up construction times, from the drawing board to the final installation, with possibly no litigation involving rights of way easements and the like associated with overhead 500KV HVAC Power Transmission lines and overall cost savings and advantages in the long term.

Any and all information would be very helpful and grateful.

Thank you Tony, for your time and assistance and I look forward to hearing from you.

Best regards,
Donald Beck

Don Beck Bronzes

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email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

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TARDAEWETHER Kellen * ODOE

From: Don Beck <donbeck@donbeckbronzes.com>
Sent: Monday, July 15, 2019 1:43 PM
To: comment@boardmantoehemingway.com
Cc: 'Stokes, Mark'; 'Jeff Maffuccio'; 'David Yeakley'; comment@boardmantoehemingway.com; bharvey@bakercounty.org; 'Greg Smith'; 'Greg Smith'; senator_wyden@wyden.senate.gov; SEN Bentz; REP Findley; mbennett@bakercounty.org; TARDAEWETHER Kellen * ODOE; odoe@service.govdelivery.com; 'gov'
Subject: [Fortimail Spam Detected] RE: In opposition to B2H Idaho Power proposed route through Baker County

Dear Sirs/Madam:

Thank you for your response and for the record we all have done that for many years now to no avail....Idaho power by their persistence is only interested in saving themselves money with the least expensive installation method to reap huge profits from cheap energy with no concerns for we the people or our communities even with the latest new HVDC Technologies available today and currently proven and used all across our Nation and around the world for many years. High Voltage D/C power affords the safest method of transmission of energy through our valuable timber resources removing the potential of deadly Forest Fires and public health issues; both from EMF Hazards and deaths caused by potential Devastating Forest fires, not accounting for air quality and subsequent respiratory damage caused.... The potential for their High Voltage A/C infrastructure to cause forest fires like California experienced recently in three separate Forest Fires caused by Pacific Gas & Electric Company's faulty infrastructure are not just confined to California Forests, but Oregon communities are just as vulnerable to fires from any High Voltage A/C Transmission Energy lines faulty conductors and/or infrastructure. No one seems to fully understand the urgency or to really be concerned about safety until after these disasters, but most interested in their own bottom line, the buck, at the risk of human lives and private property and local communities. Safety of human life must be a priority of any new installation and hopefully in time retrofit existing HVAC Transmission line through our Forests to make our lives better, safer and preserve our renewable resources our Forests.

Again, with all due respect as Citizens of Oregon we do expect our government agencies who have the Oversight and Authority to approve or not approve these requests from Big Energy Corp, such as Idaho Power to fully investigate and become educated in all latest methods of installation alternatives and be well informed as to the Truth with Safety of Human Life, Forest Timber Resources, private and rural communities property a Priority, and not just side with Big Energy Corp's unwillingness to use the latest Technology in the transportation of High Voltage Energy. As citizens we all are forced use the newest and latest technologies or be left behind and it is time for Big Corporations to incorporate these latest technologies that can prevent these tragic Disasters and loss of human lives. Knowing there are solutions and preventive measure available today that were not available decades ago. We have no excuse for blatantly ignoring the facts now that we know there are better and safer and less expensive ways when considering no energy loss along these HVDC lines to transmit High Voltage Energy though our communities and forests.

I think this is an issue that Government oversight commissions should be very concerned about and do some diligent investigations and insights as to what are the potential dangers to the public and the best alternative to alleviate the potential for devastation as we Now know exists from HVAC Energy Transmission

infrastructure, not to mention the savings of loss of energy for the entire transmission route, not just taking the word of Big Energy, thus Idaho Power at the risk of our communities, rural economies and human lives. Public Relations works both ways, not this is what we are going to do like it or not attitude. Let us all resolve to always do the right thing in the best interest of people's lives.

I find all these continual meetings yield nothing, but only offer of a pacifier to the public thinking they are open and listening and yet they still never give up or compromise their original proposed plan and route at the expense of those of us who have to live with the after affects and the known potential dangers and disasters it will present in time, hoping the citizens will give up and they can ramrod their original routes and outdated methods of installation.

Respectfully,
Donald R. Beck
Baker City, OR

Don Beck Bronzes

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email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

Baker City, OR 97814

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From: comment@boardmanto hemingway.com [mailto:comment@boardmanto hemingway.com]

Sent: Monday, July 15, 2019 10:49 AM

To: donbeck@donbeckbronzes.com

Cc: 'Stokes, Mark' <MStokes@idahopower.com>; Jeff Maffuccio <jmaffuccio@idahopower.com>

Subject: RE: In opposition to B2H Idaho Power proposed route through Baker County

Hi Don,

Thank you for your comment, we appreciate you taking the time to share your thoughts.

If you would like to discuss the project further, Idaho Power would be happy to meet with you. Feel free to reach out to Jeff Maffuccio (jmaffuccio@idahopower.com) and Mark Stokes (mstokes@idahopower.com) if you would like to arrange a meeting.

All the best,
The B2H Team

From: Don Beck <donbeck@donbeckbronzes.com>

Sent: Friday, July 12, 2019 2:55 PM

To: Kellen.Tardaewether@oregon.gov; odoe@service.govdelivery.com

Cc: David Yeakley <dyeakley@charter.net>; comment@boardmanto hemingway.com; bharvey@bakercounty.org; Greg Smith <smith.g.rep@state.or.us>; Greg Smith <bakercountyledc@gmail.com>; Senator_Merkley@Merkley.senate.gov <Senator_Merkley@Merkley.senate.gov>; senator_wyden@wyden.senate.gov; Sen.CliffBentz@oregonlegislature.gov; Rep.LynnFindley@oregonlegislature.gov; mbennett@bakercounty.org

Subject: FW: In opposition to B2H Idaho Power proposed route through Baker County

Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

Dear Sir/Madam:

Re: Public Comment Deadline Extension and Transcripts Available on Proposed Boardman to Hemingway Transmission Line

Comment for the Record:

It is time that Public Utilities become more interested in safety of Human lives, private and commercial property and our natural resource Timber (Forests) and rural community economic resources in light of the horrific death toll caused by Forest Fires resulting from Utility Company faulty Power Lines and Equipment such as Pacific Gas & Electric Company infrastructure that caused the deadly "Camp Fire" in Northern California town of Paradise and outlying communities.... Please view my herein correspondence with a Utility Company who is familiar with HVDC Power Transmission of energy with much Less loss of energy along the transmission route and safer for people, animals; domestic and wildlife, property and our Valuable Timber resource, our Forests. This newest technology is being used all around the world today with success and offers the most safest method of transmission of power energy with less Loss of energy, Waste of Energy along the transmission line.

There are better alternatives today, both in underground and/or HVDC Power Transmission lines than current HVAC, with no hazardous EMF danger. Power Energy Corporations and government oversight agencies must take into account the latest 21st century technology available today to protect Human Lives, Commercial and Private Property and protect our valuable Timber, our Forests, against such Preventable tragedies....not to mention citizens health related problems caused by all the smoke from these fires over the obstinate Big Energy Corporation's only concern for their bottom line utilizing the most least expensive routes and installation methods available today with no concern or regards for the public health & rural Oregon Communities. The savings of loss of energy along these long routes is not considered in costs as these costs are passed on to the consumer...less loss of energy/wasted energy is a huge savings to the consumer and if absorbed by the Power Energy Corporations they would be encouraged to find better alternatives. Lives are more valuable than dollars.

Human lives, private property, rural communities and our valuable forest timber resources must be first priority...cheapest is not always cheapest when seeing the devastation and the Cost Burden now facing Pacific Gas & Electric Company of California, not to mention all the personal suffering of victims.... Oregon is not exempt from such disasters and is a ticking time bomb that all will be responsible for by ignoring the potential of other such fires in rural Oregon. There have been several California forest fires triggered by Pacific Gas and Electric Company's Power Energy Transmission lines and failed infrastructure and these are not limited to California.

Thank you for your time and consideration.

Respectfully,
Donald R. Beck
Baker City, OR 97814

Don Beck Bronzes

Visit our on-line Gallery: <http://www.donbeckbronzes.com/>

email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

Baker City, OR 97814

- "Truly my soul silently waits for God; From Him comes my salvation. He only is my rock and my salvation; He is my defense; I shall not be greatly moved" Psalm 62:1-2

From: dyeakley@charter.net [<mailto:dyeakley@charter.net>]

Sent: Friday, July 12, 2019 1:14 PM

To: 'donbeck@donbeckbronzes.com' <donbeck@donbeckbronzes.com>

Subject: RE: In opposition to B2H Idaho Power proposed route through Baker County

Have you sent this to the Energy Facility Siting Council? Input is due by July 23, and you could forward this information to:

B2H.DPOComments@Oregon.gov

I took the council standards, and went through them to show why the line should not be built.

Take care.

From: "Don Beck"

To: bharvey@bakercounty.org

Cc: "David Yeakley", "Cliff Bentz", "Congressman Greg Walden", "Greg Smith", "Greg Smith"

Sent: Monday February 4 2019 4:23:16PM

Subject: RE: In opposition to B2H Idaho Power proposed route through Baker County

Dear Commission Bill Harvey:

Greetings and Happy New Year! For the record and for your information as well as those working on the opposition of the BH2 Idaho Power transmission line I would like to forward to you the information that I received to my inquiry as to the best solution for installation and long term feasibility & safety of HVDC power verses HVAC power the current method of transportation. HVDC would not present the EMF human safety affects nor the potential of forest fires, like what transpired by the Californian P.G.&E. Co of California which is now in bankruptcy due to "CAMP FIRE" where complete towns, communities of nearly **3000 commercial buildings/businesses** and **14,000 residential homes** were destroyed and took **88 lives**

<https://www.cbsnews.com/live-news/california-fires-containment-search-rescue-air-2018-11-22-camp-woolsey-paradise-live-updates/> This is a very Important aspect of the problem with HVAC overhead power lines. Communities and Lives are put at risk and we cannot afford to ignore this potential in Baker County just to allow Idaho Power to dictate their most economically based installation methods, which does not take into consideration the Power Loss along the entire distance of the Transportation of Power. It is not a matter of if, but when! As you investigate P.G. & E.'s account or record this was not the first nor only accounts of their facilities causing loss of life, forests and property, just the straw that broke the camel's back. They have been proven to lie when investigations that occurred in support of their faulty facilities on numerous occasions. Money should not dictate objectives over the Lives and Communities, Towns and Forests.

With the newest and latest advancement technology age that we now live in there are better, safer and more efficient ways of doing business and the Big Electric Corporation should respect the lives and communities that

they want to just mow through thinking of and only putting the dollar first and now, before lives and loss revenue due to Power Loss along these lines annually.

After considering my questions in the correspondence below and the contact I was given for further answers of my questions perhaps you could forward this information to whomever is in the position for the County to represent the opposition to B2H Idaho Power proposed route through Baker County to Boardman, OR so that they can be equipped with questions that need answers and follow through with the best method for our community in best interest of Baker County citizen's lives, property owners, including safety from EMF affects then present findings to Idaho Power.

Thank you Bill, and all the best to you. We greatly appreciate your leadership.

Best regards,
Donald Beck

Don Beck Bronzes

Visit our on-line Gallery: <http://www.donbeckbronzes.com/>

email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

~ “And He hath put a new song in my mouth, even praise unto our God: many shall see it, and fear, and shall trust in the LORD” Psalms 40:3

From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]

Sent: Monday, February 4, 2019 3:02 PM

To: donbeck@donbeckbronzes.com

Subject: RE: HVAC vs. HVDC

Donald,
I'd say 400 + miles as the threshold of cost/benefit for HVDC

From: Don Beck <donbeck@donbeckbronzes.com>

Sent: Monday, February 04, 2019 4:10 PM

To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>

Subject: RE: HVAC vs. HVDC

EXTERNAL

Thank you Tony: One last question what is considered long distance? We are talking about 400 miles here.

Thanks,
Donald Beck

Don Beck Bronzes

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email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

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From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]
Sent: Monday, February 4, 2019 1:23 PM
To: donbeck@donbeckbronzes.com
Subject: RE: HVAC vs. HVDC

Donald,
ISO is an independent system operator, and as Oregon does not have its own, the California ISO is the closest one and would be more geographically relevant than our Midwest system operator.

Due to the complexity of HVDC systems, I'd not expect HVDC to be the future of HV overhead lines...my perspective is HVDC overhead makes sense for long distances with a dedicated purpose. Outside of the United States, HVDC (non-classic technology) is being utilized for under water and other unique applications...EPRI would be a great resource here!

Thanks,
Tony Ramunno

From: Don Beck <donbeck@donbeckbronzes.com>
Sent: Monday, February 04, 2019 3:07 PM
To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>
Subject: RE: HVAC vs. HVDC

EXTERNAL

Hi Tony:

I understand fully, the internet is a great too, but with it comes all the need for protection filters.

I wanted to question your suggesting contacting California ISO, not knowing what this stands for my question is do you think they would cover the state of Oregon, or mistype? If, so would you have a contact for state of Oregon?

From your own perspective is HVDC the future of HV overhead lines? Any pros and cons that you can share?

Thank you again Tony.

I appreciate your getting back with me and all the assistance provided.

Best regards,
Donald Beck

Don Beck Bronzes

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tel: 541 524 1633
add: P.O. Box 713, Baker City, OR 97814

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From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]
Sent: Monday, February 4, 2019 12:41 PM
To: donbeck@donbeckbronzes.com
Subject: RE: HVAC vs. HVDC

Donald,
Apologize for not getting back to you, these e-mails got snagged in our spam filter.

Glad you enjoyed our article in T&D...You ask some great questions below! The work we have done here at Great River Energy has been focused on age and condition analysis of the existing system for long-term reliability. We worked through MISO, our regional system operator, relative to broader applicability "upgrade analysis" portion, and utilize EPRI's (Electric Power Research Institute) HVDC sector for applied research. Similarly, our contacts at ABB are project management, transformer replacement, and engineering and design for "retrofit" projects.

My suggestion would be to reach out to California ISO, as they would be able to provide the HVDC vs HVAC analysis criteria and financial thresholds. Not sure if EPRI would be very helpful outside it's utility membership, however, that would be another source of excellent information.

Thanks,
Tony Ramunno

From: Don Beck <donbeck@donbeckbronzes.com>
Sent: Thursday, January 31, 2019 2:30 PM
To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>
Subject: HVAC vs. HVDC

EXTERNAL

Hi Tony:

How are you? I am following up on my earlier request below which I sent the first of this month requesting some information as to HVDC comparisons with HVAC electric transmission lines. I know you have a busy schedule and perhaps impacted with all the cold weather. However, I was wondering if you will be able to assist me in this information? And if not, can you direct me to a source within your company to assist me and our county commissioners in this matter?

I would appreciate any assistance you may offer us or contact source for the information listed.

Thank you Tony, for your time and assistance in this matter. Have a Blessed day!

Best regards,
Donald Beck

Don Beck Bronzes

Visit our on-line Gallery: <http://www.donbeckbronzes.com/>
email: <mailto:donbeck@donbeckbronzes.com>
tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

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From: Don Beck [<mailto:donbeck@donbeckbronzes.com>]
Sent: Wednesday, January 9, 2019 12:56 PM
To: 'tramunno@greenergy.com' <tramunno@greenergy.com>
Subject: HVAC vs. HVDC

Great River Energy www.greatriverenergy.com
Att: Tony Ramunno

Dear Tony:

Hi, I have a few questions that I would appreciate some help with. I received an email from T&D World which sparked my interests and having gone to their website <https://www.tdworld.com/overhead-transmission/reliability-upgrade-hvdc-system> I viewed an article on your project “Great River Energy’s HVDC system is made up of a 436-mile (702-km), 400-kV transmission line and two converter stations”.

I would like some technical advice and suggestions as to the HVDC verses the HVAC. I have 15 years’ experience working for Pacific Gas & Electric Co. of California in the 60-70’s. I currently live in the Pacific Northwest in the state of Oregon and an out of state Electric Power Utility Company has proposed installing a 500KV HVAC Overhead Power Transmission Line approximately 300 miles through Oregon. With the potential of forest fires due to any faulty equipment through the forests like was experienced recently in Paradise, CA “The CAMP FIRE” where complete towns, communities of nearly 3000 commercial buildings/businesses and 14,000 residential homes were destroyed and took 88 lives <https://www.cbsnews.com/live-news/california-fires-containment-search-rescue-air-2018-11-22-camp-woolsey-paradise-live-updates/> . Due to this most recent Tragedy and not considering the other fires attributed to this utility company facilities, I was interested in the best and safest method of infrastructure and installation moving forward such as Underground and/or Overhead 500KV HVDC verses Overhead 500KV HVAC Power Transmission Lines?

I am looking for comparison of Installation Facilities and Construction Methods of HVAC and HVDC power transmission. The Best Transmission Infrastructure equipment (facilities) information for the most Safest, Cost Effective and most Conservative means of energy transmission from point A to point B (with less line energy loss along the route) utilizing the new Advanced Technology of HVDC verses utilizing the Past and current methods/facilities of Overhead Line Transmission of 500KV HVAC Energy. Conservation of energy loss and Safety being of greatest importance as well as startup cost difference and long range savings. According to the Power Company it is my understanding with the past and current methods of overhead HVAC that 30% of electric energy is Lost along these long distance overhead power transmission lines. Another concern is the private property owners fear for health and human safety concerns from EMF near to their homes and farm lands with workers working in and around the high voltage lines. Not to mention the rights of way easement litigation and long periods of time for public meetings and approval prior to starting construction which all add up to substantial costs associated with 500KV HVAC Overhead Line Construction. All considerations taken into account I feel that there must be a better alternative to the past installation methods, facilities and construction procedure with all the latest new Advanced Technology of installation and construction of 500KV HVDC power lines, overhead and/or underground.

1. Taking into account of all the New Advanced Technology how does the HVDC Transmission lines differ from current 500 KV High Voltage A/C Lines; cost of installation, methods, safety (EMF's)? Including, above ground or below ground infrastructure potential?
2. Health Risks near installed high voltage 500KV HVAC overhead lines verses 500KV HVDC lines?
3. Costs and savings for installation, facilities and maintenance of HVAC High Voltage verses HVDC High Voltage Transmission infrastructure? Both short term and long term.
4. Cost savings due to 500KV HVAC Line leakage; overall line energy loss in 300 mile distance compared to 500KV HVDC?
5. Are fewer high voltage lines required with either method of transmission, so that more lines could be added in the future to existing electric grid corridor?
6. Best Infrastructure System through Farm Lands, Private Property, Rural Communities, Towns and aesthetics in Historic Site areas, Tourism and with improved public relations and potential for public support rather than concerns for health related issues and other negative impacts, including potential cause of forest fires. As we can see even the risk for the potential of one forest fire by faulty power company's equipment can outweigh the savings of the entire cost of installation of any proposed overhead 500KV HVAC Power Transmission Line to the Electric Utility Power Company, not to mention private property and human life.
7. In addition perhaps you could put me in contact with someone at www.abb.com if you feel that they could be of further assistance to us.

Being a retired PG&E Construction employee from Northern California with the installation experience in 500KV HVAC Power Transmission and distribution lines with this new era of Advanced Technologies I would like to know the Best alternatives today in comparisons of construction methods of the Past use of overhead HVAC Power Transmission Lines verses HVDC Power Transmission Lines and the feasibility of Underground verse Overhead infrastructure?

Our goal is finding a solution with less impact on health and safety of our citizens, small Rural Communities, Towns, Private Property, Exclusive Farm Lands and Historic Sites in Oregon, which includes to help eliminate the negative impact associated with AC 500KV HVAC Power Transmission Lines and their unsightly 200' Structures in a Tourist region. Public relations by working with locals would be beneficial to all parties and would insure shorter start up construction times, from the drawing board to the final installation, with possibly no litigation involving rights of way easements and the like associated with overhead 500KV HVAC Power Transmission lines and overall cost savings and advantages in the long term.

Any and all information would be very helpful and grateful.

Thank you Tony, for your time and assistance and I look forward to hearing from you.

Best regards,
Donald Beck

Don Beck Bronzes

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ESTERSON Sarah * ODOE

From: Mickie Bell <marcyne5@hotmail.com>
Sent: Thursday, August 22, 2019 4:14 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 0/28/2018; Draft Proposed Order 5/23/2019

August 22, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Dept of Energy
550 Capitol Street N>E.
Salem, OR 97301

Via E-mail: B2H DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft PROPOSED Order 5/23/2019

To Chairman Beyeler and Members of the Council

I appreciate the opportunity to comment on the B2H Draft Proposed Order. The Oregon National Historic Trail will be **significantly affected by the Transmission Line.**

The Draft Proposed Order identifies significant impacts to the Oregon Trail in several Exhibits, including Exhibit C: Property Location and Maps; Exhibit L; Protected Areas; Exhibit R: Scenic Aesthetic Values; Exhibit S: Cultural Resources; Exhibit T; Recreational Facilities and Exhibit X: Noise.

B2H crosses the Oregon Trail at least 8 times; EFSC has done a reasonable job of protecting the Trail during construction and operation, if the proposed requirements are followed, **except at the Oregon Trail Interpretive Center at Flagstaff Hill.**

B2H Transmission Line should be buried for approximately 2 to 2 1/2 miles to comply with the exhibits indicated above. Idaho Power has from the early years refused to do any significant analysis for this option. IPC uses cost as the reason for stating under-grounding is not feasible. Cost is not a specific standard, and costs are the responsibility of the Oregon Public Utilities Commission during rate considerations. EFSC has determined the IPC has the Financial ability even if some partners choose to not participate, so reasonable cost should not be a determining factor for EFSC.

EFSC should refuse to approve the Draft Project for the following reasons.

1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," in the context of residential sleeping areas; however, certainly for tourists and visitors to the interpretive Center and Hiking trails noise will be disturbing. Map23 in Attachment X-1 does not even show the Oregon Trail.

2. Within OAR 345-022-0040 Protected Areas and ODEQ standards 340-035-0000-0100, this area should have been monitored and modeled as a Noise Sensitive Property and was not.

3. Does not comply with Scenic Values from the Blue Mountains Parkway and Oregon Trail Interpretive Center. The OR 86 encourages drivers to STOP and read interpretive signs, so viewer perception and resource change cause significant decrease of scenic values. IPC says no significant impact.

4. The DPO does not comply with Exhibit L Protected Areas. The BLM ACEC at Flagstaff Hill has not considered under-grounding for the protection of the Oregon Trail. No analysis found the pristine Class 1 swales of the Oregon Trail within the ACEC located at: Lat 44.813762 Long - 117.750194 or 44 degrees 48ft 48.26"N 117degrees 75ft 57.97"W. IPC proposes to build a new construction road over the Oregon Trail in the area identified in the location above.

5. the DPO does not meet the standards required for Exhibit T Recreational facilities, OAR 345-022-0100, especially at the Flagstaff Hill Interpretive center, because of:

- a. It is a BLMACEC area managed for public tourism.
- b. It is the single most visited tourist facility in Baker County.**
- c. The quality of the facility is outstanding.**
- d. There is no other place where the Oregon Trail can be seen and interpreted.**

6. the cost estimates of IPC do not compare with those of the Edison Electric Institute, January 2013 publication "out of Sight, Out of Mind, An Updated Study of the Under-grounding of Power Lines." This article suggests that for 2.5 miles of rural under-grounding, the cost will be \$67,500,000. This is almost half the IPC estimate.

The Oregon Trail along the route of the B2H has the most damaging effects to its critical historic elements. Once the Trail is gone it cannot be reconstructed or mitigated back to life. **Once gone, always gone.** The only easily accessible public facility in Oregon is the Flagstaff Hill Interpretive Center near Baker City. The B2H must be buried to preserve this important site.

Considering the reasons above and the unconscionable desecration of our national treasure, the Council Must Deny the side certificate for the Boardman to Hemingway Transmission Project.

Thank you,

Marcyne Bell
3126 Elm Street
Baker City, OR 97814

marcyne5@hotmail.com



Virus-free. www.avg.com

1112 1/2 Adams Ave
La Grande, OR 97850

POSTMARKED ON 5/2
17 AUG 2019 PM 4 L



Energy Facility Siting Counsel
Attn: V. Tardeweth
Oregon Dept. of Energy
550 Capitol St., NE
Salem, OR 97301-374299

RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

**B2H EFSC FAILURE TO SURVEY ACCESSIBLE AREAS FOR NORTHERN GOSHAWK AND
AMERICAN THREE-TOED WOODPECKER, FAILING TO PROVIDE CURRENT INFORMATION,
AND FAILURE TO COMPLETE SURVEYS IN ACCESSABLE AREAS.**

The developer indicates that reasons for incomplete surveys was because the landowners would not give permission, timing conflicts, or the need to cross parcels not approved to access the area. The applicant failed to survey 287 locations. Many are located along the applicant's "preferred option". In fact, it appears that no surveys were performed from Mile Post 95 to Mile Post 115 which is virtually the entire length of Idaho Power's preferred alternative near the city of La Grande. There are also many locations from approximately Mile Post 95 to Mile Post 105 which are accessible, but have not been surveyed. See Figure P1-1, Page P1-II of application.


Literally 1/3 of the required surveys have not been completed, and the surveys which were completed were done in 2011 and 2012. The limited additional surveys done in 2016 did not include American three-toed woodpeckers which are listed as sensitive in the analysis area. The developer is proposing no additional surveys be performed. The developer provided misleading information regarding the surveys when they listed in Figure P1-1 that surveys were completed in 2016. Only a small area was surveyed in 2016 and not for both species. In addition, none of the areas where the alternate route exists in Union County were surveyed. The applicant is proposing that a site certificate be issued based upon these dated, minimal surveys with no new surveys being conducted.

The lack of surveys in the areas near Ladd Marsh is very disturbing. There is the potential for both these bird species to be present in the area. It is part of the Survey Area, however, there are practically no surveys along the proposed line. There is no basis for failing to complete surveys on all areas that can be accessed. This project was initiated over 10 years ago. Completed surveys should have been provided in the application, not 2/3 of them. The applicant has failed to comply with the requirements of OAR 345-021-0060 regarding completion of surveys and cannot be found to be in compliance with OAR 345-022-0060.

The developer is proposing no additional surveys. The Site Certificate cannot be issued absent the developer providing current surveys of accessible areas. There is no exemption allowing a developer to provide no current information and no determination can be made regarding eligibility absent any reliable information regarding impacts to these protected birds. This material needs to be in the application prior to the Site Certificate being issued.

Signature/name

Address:


1211 E Delta, Union

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

**B2H EFSC FAILURE TO SURVEY ACCESSIBLE AREAS FOR NORTHERN GOSHAWK AND
AMERICAN THREE-TOED WOODPECKER, FAILING TO PROVIDE CURRENT INFORMATION,
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Signature/name



Kathy Benson

Address:

121 E Delta Union Or

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

APPLICANT FAILED TO INCLUDE ALL REQUIRED SOURCES OF NOISE IN THEIR MODELING OF NOISE IMPACTS OF DEVELOPMENT


Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (l) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement."

The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

The application is incomplete. Without having the information regarding these additional noise sources, the department and the siting council lack the information regarding how many noise sensitive properties are impacted and by how much.

A proposed order cannot be issued until the developer submits all the information regarding the noise impacts of this development. This information must be available to decide if the standard is met or if it can be met with additional site conditions.

Sincerely,


Signature

Kathy Benson

Printed Name:
Mailing Address:

121 E Delta Union OR

ESTERSON Sarah * ODOE

From: Ruth Betza <rebetza@gmail.com>
Sent: Thursday, August 22, 2019 12:22 PM
To: B2H DPOComments * ODOE
Subject: Please Deny B2H

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/018;
Draft Proposed Order 5/23/2019

Dear Chair Beyeler and Members of the Council,

Please deny the site certificate for B2H. I am a landowner, voter and tax payer of Union County Oregon who cannot see any benefit to my County or my State from this huge project that comes from Idaho.

We citizens have to adhere to Union County planning rules so I don't see how a project from Idaho should be able to get around them.

As an avid outdoors person and lover of natural beauty I am against an unnecessary transmission line running through Glass Hill or the high country above La Grande. We love our outdoors—that's why we live here.

We don't need or want B2H. There is no benefit to Union County or to Oregon.

I respectfully ask you to deny the site permit.

Ruth Betza
76372 Palmer Junction Road
Elgin, Oregon 97827
rebetza@gmail.com
(541) 437-9201

ESTERSON Sarah * ODOE

From: Linda Birnbaum <birnbaumlinda42@gmail.com>
Sent: Tuesday, August 20, 2019 11:28 AM
To: B2H DPOComments * ODOE
Subject: Wildfire and land stability concerns

August 20, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

I am very concerned about the Boardman to Hemingway Transmission Project as it is proposed. My concerns are for the safety of myself and all of the citizens of La Grande if this line is permitted. My primary concerns are slope instability and wildfire hazard.

The proposed route sited to the west of La Grande is placed on a ridge noted to have instability and high risk for slides. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in not heeding the geologists' warnings. The area down slope from the proposed B2H line lies the Grande Ronde Hospital and Clinics, which employs hundreds of people and is the critical access hospital for this region. La Grande High School and Central Elementary School are also positioned down slope from the proposed towers. At least 100 homes are positioned down slope of the proposed towers. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker, and Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (2015), Nuns Fire in Sonoma County (2017), which were all attributed to transmission.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city limits, including medium density housing within the city as well as Grande Ronde Hospital. If a line from this proposed route were to spark a fire, La Grande residents would have little time to react. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in grasslands. A fast-moving fire starting at the B2H lines could move to residential areas of La Grande and HOSPITAL in 10 minutes. This is frightening and an unacceptable risk for our citizens.

The current proposal for a Boardman to Hemingway transmission line does not adequately address the issue of landslides, basically by stating it will be mitigated somehow when the time comes to build. The proposal offers no analysis of wildfire risk, which is an unacceptable omission. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of La Grande.

The Council should DENY the request for a site certificate.

Sincerely,

Linda Birnbaum

Name:

Address: 64540 Cherrywood Road
La Grande, OR. 97850

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.

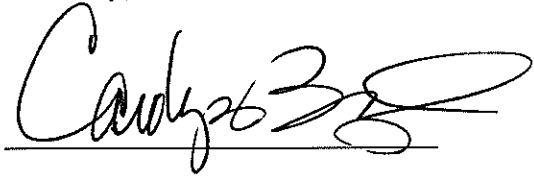
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Carolyn Floyd', written over a horizontal line.

Name: CAROLYN FLOYD

Address: 702 2nd
LaGrande OR 97850



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Sylvia Bowers

Mailing Address (mandatory) 2490 Baker Street
Baker City, OR, 97814

Phone Number (optional) () _____ Email Address (optional) ssbawers1@bakerlib.org

Today's Date: 6-19-19

Do you wish to make oral public testimony at this Hearing: Yes _____ No ☒

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

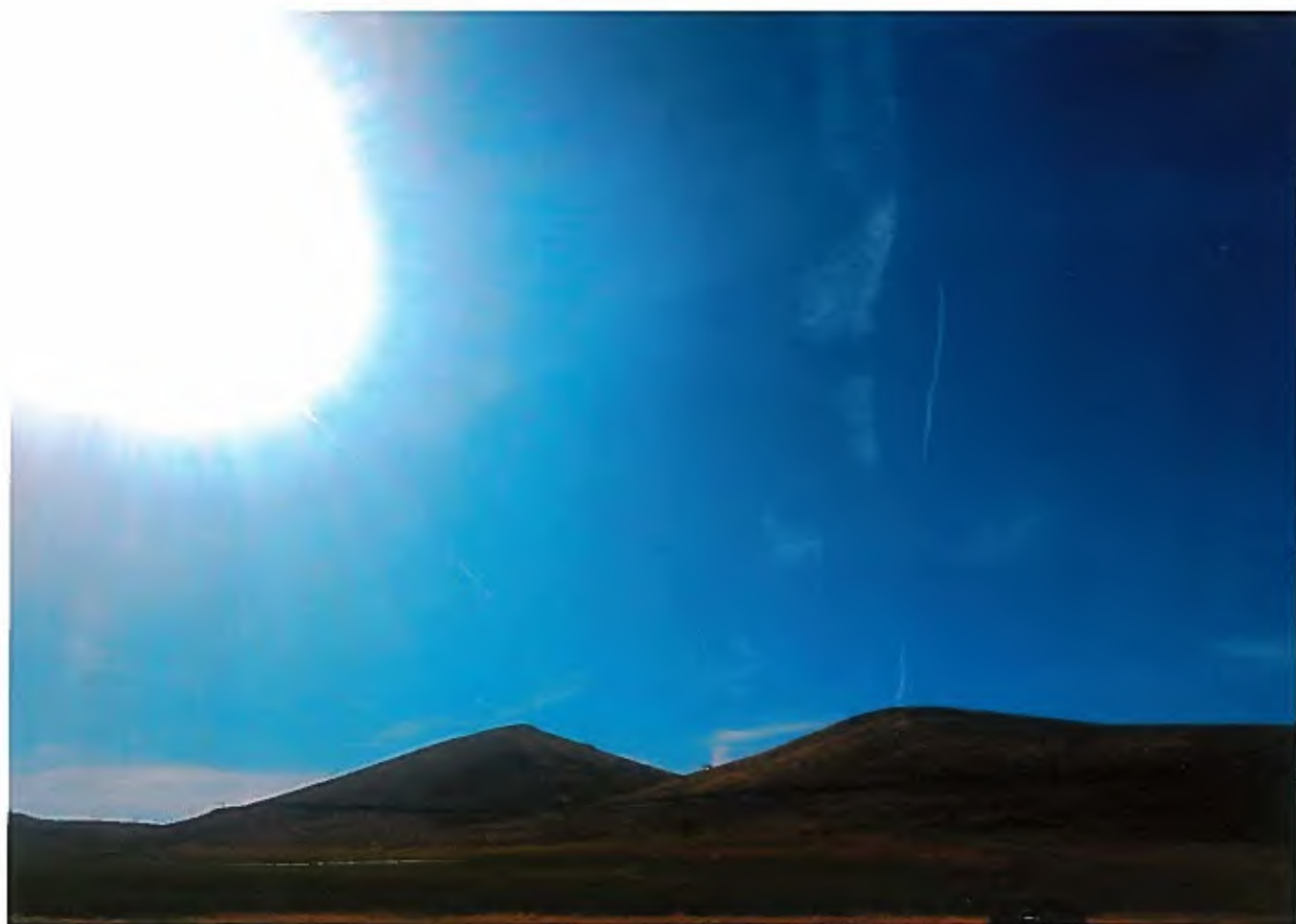
Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

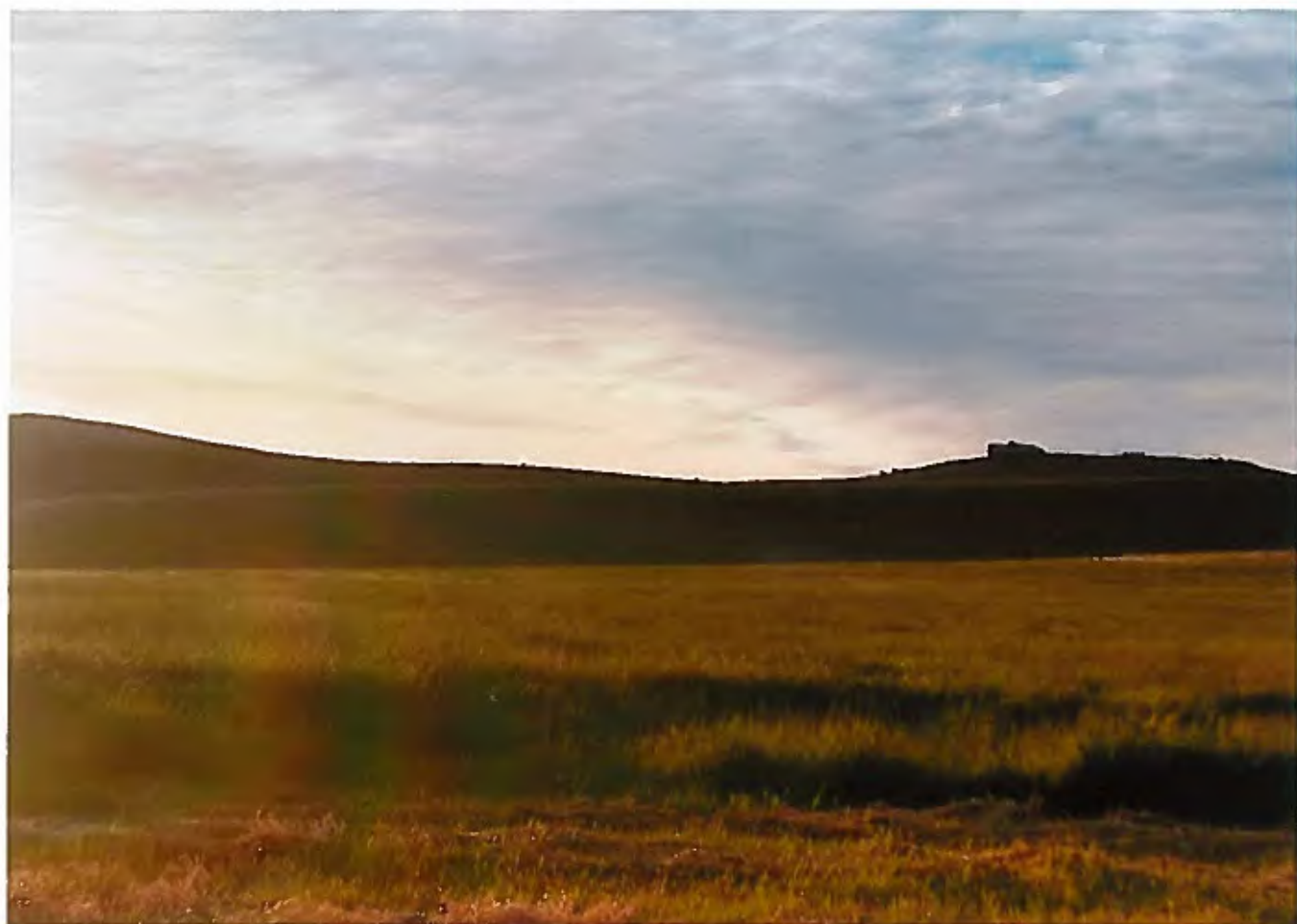
The concerns I would like to address regarding the
construction of this power line are 1) aesthetic quality and
natural beauty of the Baker Valley that encourages
indoor recreation and historic tourism. 2) the economic
health and growth of this area resulting from
Baker Co. being a popular area for newly retired persons

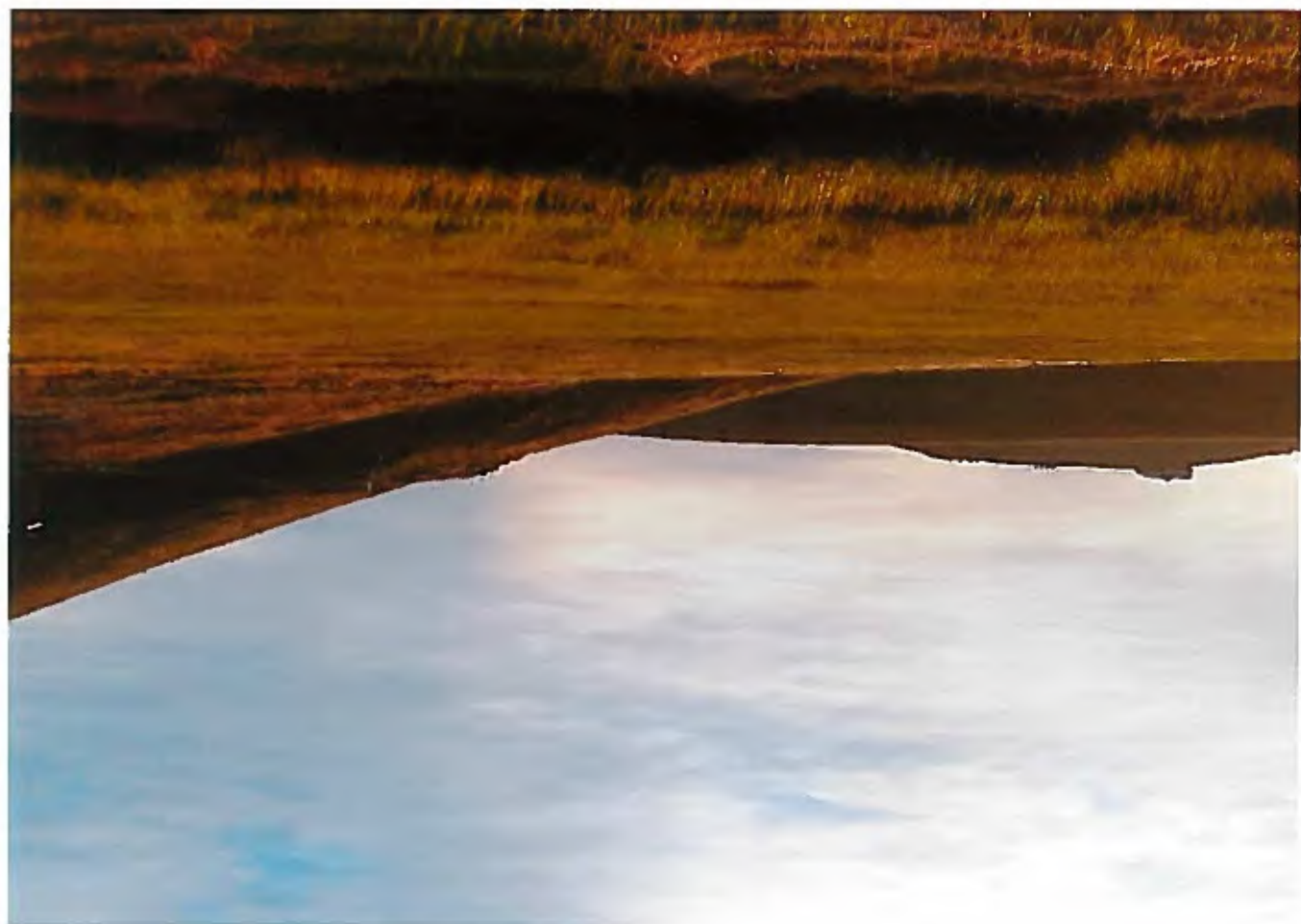
(additional space for written comments)

to relocate to. I think the building of
the transmission lines would jeopardize
both of these benefits we have from
having a beautiful, undamaged natural
environment. I would like to see the
Oregon Department of Energy committee consider promoting
more local-friendly, human-friendly energy options
that does not include the proposed Vinto Power
transmission line and that reflect current
and emerging sustainable energy options.











Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) JERRY L. BOWMAN

Mailing Address (mandatory) 2197 Rock Springs Canyon Rd
NYSSA, OR 97913

Phone Number (optional) (541) 1372-5360 Email Address (optional) _____

Today's Date: 6-18-19

Do you wish to make oral public testimony at this Hearing: Yes X No ~~✓~~

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

POWER LINES WILL BE TO CLOSE TO RESIDENTS. COULD BE

BETTER ROUTES TO ELIMINATE EMF

NOISE LEVEL OF TRANSMISSION LINES

RED TAIL HAWKS NESTS

BALD EAGLE NEST WITHIN 1/4 MILE

<p style="text-align: right;">Page 62</p> <p>1 SECRETARY CORNETT: So we have one more 2 comment card, it's from Idaho Power Company. My 3 understanding is only if the Council members have 4 questions for them; is that correct? So if Council 5 members have any questions based on the testimony that 6 they've heard from others, if they'd like to follow up 7 with any questions with Idaho Power Company, they are 8 available to answer your questions. 9 VICE CHAIRMAN JENKINS: So I'd like Idaho 10 Power to talk about the tower placement between milepost 11 255 and 258, if they could, please. 12 SECRETARY CORNETT: So we can also take a 13 short break if Council and presiding officer is 14 interested to give Idaho Power a little bit of time to 15 think about responding or you could respond now if you'd 16 like. 17 MR. MARK STOKES: If we could have a few 18 minutes to at least look at the map. 19 HEARING OFFICER WEBSTER: Is Council good with 20 taking a ten-minute break and reconvening? 21 VICE CHAIRMAN JENKINS: Sure. 22 HEARING OFFICER WEBSTER: It's 6:05 now. 23 Let's reconvene at 6:15 to hear from Idaho Power. 24 (Recess taken.) 25 HEARING OFFICER WEBSTER: We will go back on</p>	<p style="text-align: right;">Page 64</p> <p>1 We have a continuous nest of bald eagle that is in the 2 same vicinity, within a quarter of a mile. 3 And I think that there was a proposed area for 4 the transmission line which was a little ways south of 5 where we are. A couple of miles on up the canyon 6 there's already a transmission line crossing. Why can't 7 they put the proposed transmission line adjacent to that 8 one? It's already designated for that type of system. 9 That's all I have. Thank you. 10 HEARING OFFICER WEBSTER: Thank you. 11 Mr. Stokes; correct? 12 MR. MARK STOKES: Yes. 13 HEARING OFFICER WEBSTER: If you would state 14 your name and your I guess work address and we'll go 15 from there. 16 MR. MARK STOKES: Mark Stokes. I'm an 17 engineering project leader for Idaho Power, address 1221 18 West Idaho Street, Boise, Idaho 83702. 19 And I guess to start off, I'd like to welcome 20 all of the Council members here. I appreciate you 21 traveling over here this week and next week as well. 22 We'll all be seeing a lot of each other both weeks. 23 To address the specific question that was 24 brought up, Councilman Jenkins, would you want to 25 restate your question.</p>
<p style="text-align: right;">Page 63</p> <p>1 the record here. 2 Just a couple of housekeeping things. First 3 of all, we have another member of the public who I 4 strong-armed into giving comment. So Mr. Bowman, if you 5 would like to come up, and then we will hear from 6 Mr. Stokes with Idaho Power. And when we're done with 7 that, just to give everybody, some late stragglers if 8 they have come in, the opportunity, we, the people from 9 the Department and me and probably the people from Idaho 10 Power, will be here until 8:00. So if there's somebody 11 that does come in late that still wants to give comment. 12 But after we hear from these two gentlemen here, we will 13 go I think probably back on break and then we will 14 reconvene again if somebody else comes in and wants to 15 give a comment. 16 So, Mr. Bowman, if you would state your name 17 and your address. 18 MR. JERRY BOWMAN: My name is Jerry Bowman. I 19 live at 2197 Rock Springs Canyon Road. I'm adjacent 20 property owner to Jim Foss. 21 That power line is going to be coming within 22 feet of my property. I'm concerned about the noise 23 level, I'm concerned about the electromotive force. We 24 have several nests of red-tailed hawks within a quarter 25 of a mile of where the transmission line is going to be.</p>	<p style="text-align: right;">Page 65</p> <p>1 VICE CHAIRMAN JENKINS: Sure. 2 So my question goes back to Jay Chamberlin's 3 comment about the tower placement between milepost 255 4 and 258. There was concern -- I'll just leave it at 5 that. 6 MR. MARK STOKES: Okay. After looking at our 7 map set through that area, a lot of the folks that have 8 commented this evening are in that same area, and I was 9 able to confirm that our original land was to route 10 south of that area. The reason that route is not in the 11 project right now is because BLM had determined due to 12 the scenic and natural area south of these parcels and 13 the proximity to the Owyhee River and the siphon and 14 that whole area, BLM was not willing to leave the route 15 south of these parcels. So that's really, the route got 16 changed in the whole NEPA process and was moved to where 17 it is now. That was part of the agency-preferred route 18 for BLM. So in a nutshell that's my response to that 19 question. 20 I've got a copy of this map if any of you 21 would like to look at more specific details there. But 22 that is the background of that area. 23 Now, a little more specifically, I wanted to 24 comment, Mr. Proesch contacted our office just yesterday 25 morning, that was the first time we had had any</p>

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" ¹ specifically the Modelaire-Hawthorne Loop) ², hereafter referred to as the "loop", of La Grande to access the site entrance. This residential "loop" was constructed without sidewalks for a new development around the early 1960s.

According to OAR 345-022-0110, Public Services (pg. 5. April 2017) "The applicant...must address all permanent and temporary impacts of the facility on housing, traffic, safety, police and fire protection, health care and schools." ³

My impression from reviewing the application Page 17 ⁴ is that the applicant has not fully examined the final portion of the intended route nor does it fully recognize or address the need for traffic mitigation. This "loop" is the only access to/from thirty-six houses to the rest of the city. The area to the north of the "loop" is occupied by the Grande Ronde Hospital and Medical Clinic. Two blocks to the east is located the local high school and a grade school. ²

In June of 2016, the Grande Ronde Hospital petitioned the City to have a conditional use for a parking lot expansion project next to Hawthorne. The Conditional Use Permit was approved subject to the Condition of Approval that "No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to residential standards and is not designed to support commercial traffic." ⁵

The La Grande Director of Public Works, Kyle Carpenter, provided information regarding the widths for the streets in question. The two streets range from 33 feet to 37 feet in width with no sidewalks. I personally measured the area where the unpaved stem of Hawthorne leaves the "loop" to go up the hill. At the junction it measures 32 feet curb cut to curb cut and narrows to 18-21 feet in width as it goes around the corner up the hill. 6 The Public Works Director also provided pictures of the mapping system showing the existing utilities located in the "loop". 7-8. It should also be noted that from the entrance to the "loop" at Sunset Drive to the entrance of the site the road has a 16% grade.

Attachment U2 9 from the application shows an "Aerial Lift Crane to be Used During Construction" and the Transportation and Traffic Plan on page 19 10 lists a number of other vehicles anticipated to be used. Article 6.6 — Public Street Standards for the City of La Grande Section 6.6.002 states that "Collector Streets are designed to withstand normal trucks of an HS20 loading. Larger trucks are to utilize Arterial Streets where at all possible." 11 The majority of vehicles listed on page 19 exceed that limit and would be using a Local Street in addition to Arterial and Collector Streets. According to the Public Works Director the two streets in the "loop" were designed as Local Streets for residential use, able to accept the pressures of HS20 for the purpose of an occasional need such as a weekly garbage truck or an emergency vehicle but for no more than 5% of the time. The paving construction of these over 50 year old streets in the "loop" was not designed for repetitive use by vehicles heavier than a normal car. These streets in the "loop" have not been repaved, only patched when necessary, since they were first constructed.

The application does not address the "loop" specifically, but 3.1.2 (pg. 19) 10 and Table 6 (pg.17) 12 of the Transportation and Traffic Plan indicate there would be numerous vehicles using this route. Not knowing exactly just which vehicles would be on the "loop" daily but making a conservative estimate of 50 round trips (100 single) it would be a constant parade with one truck every 7.2 minutes. This is unacceptable for numerous reasons including constant excessive noise.

Not only would weight of the vehicles be a problem but the narrowness of the "loop" streets and the ninety degree blind curves that would have to be executed would be either impossible or extremely dangerous considering the turning radius for many of these large vehicles. The

already dangerous situation for a number of driveways that exit onto these "loop" streets at blind curves would be exacerbated. 13-14

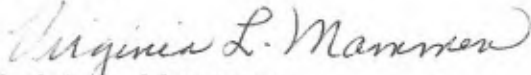
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for walking (children to school, all ages for physical training), driving, or biking. I fear there are standards that are either not being considered or they are intentionally being ignored. There should be some common sense, courtesy and respect for the impact this project would impose on any neighborhood.

Finally, La Grande Ordinance Number 3077, which adopted Oregon State Traffic Laws by reference, states in Section 17 page 8 "It shall be unlawful for any person, firm or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes." Neither Modelaire/Hawthorne Loop nor Sunset Drive are posted as truck routes. 15-16

A site review and traffic plan must be completed prior to the cite certificate being issued and not 90 days prior to construction as stated.

For the above reasons I oppose the usage of the proposed route for the construction of the B2H transmission line.

Sincerely,


Virginia L. Mammen
405 Balsa
La Grande, Oregon. 97850

gmammen@eoni.com

**TABLE 1
 STREET STANDARDS**

Functional Classification	ADT Volume	Speed (mph)	# of Travel Lanes	Travel Lane Width	Turn Lane or Median Width	Bike Lanes	Min. Bike Lane Width	On-Street parking
Downtown Arterial	10,000	20	2-3	11'	11'			both sides
Arterial	10,000	40-55	2-5	12'	4-14'	optional ⁴	5'	none
Major Collector	2,000 - 10,000	25-45	2-3	11'	12'	required	5'	one or both sides
Minor Collector	1,000 - 2,000	25-35	2	11'	none	Optional ⁵	5'	one or both sides
Local Street	0 - 1,000	15-25	2	10'	none	none	none	one or both sides

Functional Classification	Sidewalks	Min. Sidewalk Width	Planting Strip Width ¹	Total Paved Width ²	Total ROW Width ³	Private Access Spacing
Downtown Arterial	required	12'	3'6" ⁶	49'	80'	200'
Arterial	required	5'	8'	36'-72'	80'-102'	200' - 400'
Major Collector	required	5'	8'	52'-60'	62'-90'	150' - 300'
Minor Collector	required	5'	8'	30'-48'	60'-78'	75' - 150'
Local Street	required	5'	8'	28'-36'	40'-66'	Each Lot

¹ A portion of the required planting strip width may be used instead as additional sidewalk width or reduced right of way, as appropriate.

² The minimum of the paved width was calculated with the following assumptions:

Arterials: Two (2) travel lanes, four foot (4') median divider, no center turn lane, no bike lanes.

Major Collectors: Two (2) travel lanes, two (2) bike lanes, no center turn lane, parking on one (1) side.

Minor Collectors: Two (2) travel lanes, parking on one (1) side of street, no bike lanes.

Local Streets: Two (2) travel lanes, parking on one (1) side of street.

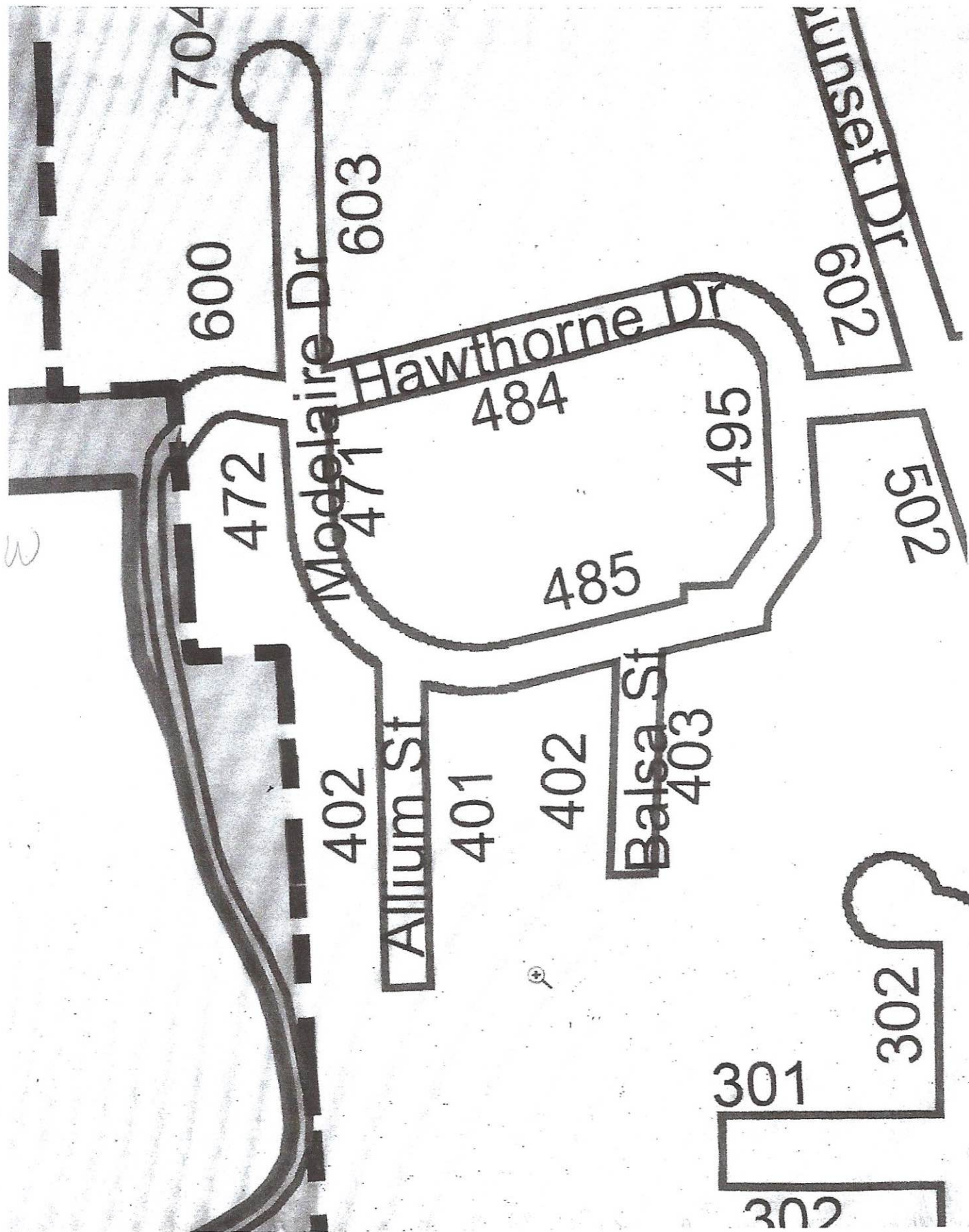
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

³ These right-of-way width ranges are for new streets.

⁴ Bike lanes should be provided on Arterials unless more desirable parallel facilities are designated and designed to accommodate bicycles.

⁵ Bike lanes should be provided on Minor Collectors where traffic volumes or other factors warrant. Otherwise, Minor Collectors should be designed and designated as shared roadway facilities with wide outside travel lanes of 14' on important bike routes.

N



S

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety. Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



Idaho Power Responses to Comments and Requests for Additional Information on the B2H APASC
from the City of La Grande
Compiled by ODOE. RAI's from the City of La Grande and Responses from IPC

		proposed helipad is a necessary supporting facility.	
U	U- Public Services include utilities such as road systems, water, sanitation services, power, and other amenities necessary for the construction.	Ordinance #2912, Series 1997 gives the City jurisdiction and control on all City street rights-of-way and Ordinance #3077, Series 2009, establishes the process and requirements for permits and licenses for uses of the streets that are not normal uses and may result in damages.	<p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p> <p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><u>Land Use Condition 9: Prior to construction in Union County, the site certificate holder shall complete the following to address traffic impacts in the county:</u></p> <p><u>a. The site certificate holder shall finalize, and submit to the department for its approval, a final county-specific transportation and traffic plan. The protective measures described in the draft Transportation and Traffic Plan in ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</u></p> <p><u>b. The site certificate holder shall work with the Union County Road Department and the City of La Grande Public Works Department to identify concerns related to Project construction traffic; and</u></p> <p><u>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</u></p> <p><u>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</u></p>

IV. CONCLUSIONS

Based on the Findings of Fact above, the Planning Commission concludes that the application meets the requirements established in LDC Articles 8.5 and other applicable codes and Ordinances.

V. ORDER AND CONDITIONS OF APPROVAL

Based on the conclusions above, the Planning Commission approves the Conditional Use Permit as requested, subject to the following Conditions of Approval:

1. No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to a residential standards and is not designed to support commercial traffic.
2. Any existing driveway curb cuts along Hawthorn Drive bordering GRH's property, that are not used for residential purposes, shall be removed and replaced with City standard improvements that exists adjacent to such areas.
3. There is a storm sewer line extending through the project area that shall to be protected. Any improvements that may affect the storm sewer line shall be reviewed and approved by the Public Works Director.

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

1. **Revisions to a Valid Conditional Use Permit:** Any variations, alterations, or changes in a valid Conditional Use Permit requested by the deed holder shall be considered in accordance with the procedures of the Land Development Code as though a new Conditional Use Permit were being applied for.
2. **Public Works Standards:** Where a development involves work within the public right-of-way, a Right-of-Way Permit shall be obtained from the Public Works Department in advance of commencing with any work in the right-of-way. All improvements within the public right-of-way shall be in conformance with the most recent adopted City of La Grande "Engineering Standard Drawings and Specifications for Construction Manual."
3. **Building Permits:** The City of La Grande Building Department shall be contacted early in the process and in advance of development to coordinate and obtain required building, plumbing, electrical and/or mechanical permits. All required permits shall be acquired in advance of construction.

VI. OTHER PERMITS AND RESTRICTIONS

The applicant and property owner is herein advised that the use of the property involved in this application may require additional permits from the City of La Grande or other local, State or Federal Agencies.

The City of La Grande land use review, approval process and any decision issued does not take the place of, or relieve the applicant of responsibility for acquiring such other permits, or satisfy any restrictions or conditions thereon. The land use decision herein does not remove, alter, or impair in any way the covenants or restrictions imposed on this property by deed or other instrument.

The land use approvals granted by this decision shall be effective only when the rights granted herein have been exercised and commenced within one (1) year of the effective date of the decision. In case such right has not been exercised and commenced or an extension obtained, the approvals granted by this decision shall become null and void. A written request for an extension of time shall be filed with the Planning Department at least thirty (30) days prior to the expiration date of the approval.



Virginia Mammen <4gmammen@gmail.com>

Modelaire Roadway Specifications

3 messages

Kyle Carpenter <KCarpenter@cityoflagrande.org>
To: "gmammen@eoni.com" <gmammen@eoni.com>

Fri, Jul 12, 2019 at 1:51 PM

I have attached a couple pictures of our mapping system that will give you a sense of where existing utilities are in Modelaire and Hawthorne. As for the widths of the roadways, I took measurements in multiple places, and found the following:

- Modelaire Drive (F Avenue) between Sunset Blvd and Hawthorne Drive is approximately 33 feet wide with a grade of about 5 Percent.
- Hawthorne Drive is approximately 32 feet wide at the bottom near the intersection of Modelaire/F Avenue and widens to about 34 feet where it intersects Modelaire at the top of the hill. The grade heading up hill is approximately 15.5 Percent.
- Modelaire Drive is generally 36 feet wide with some minor variability generally less than a foot (35' to 37'). On the southernmost segment of the roadway where the majority of the elevation gain is observed the grade is approximately 16 Percent.

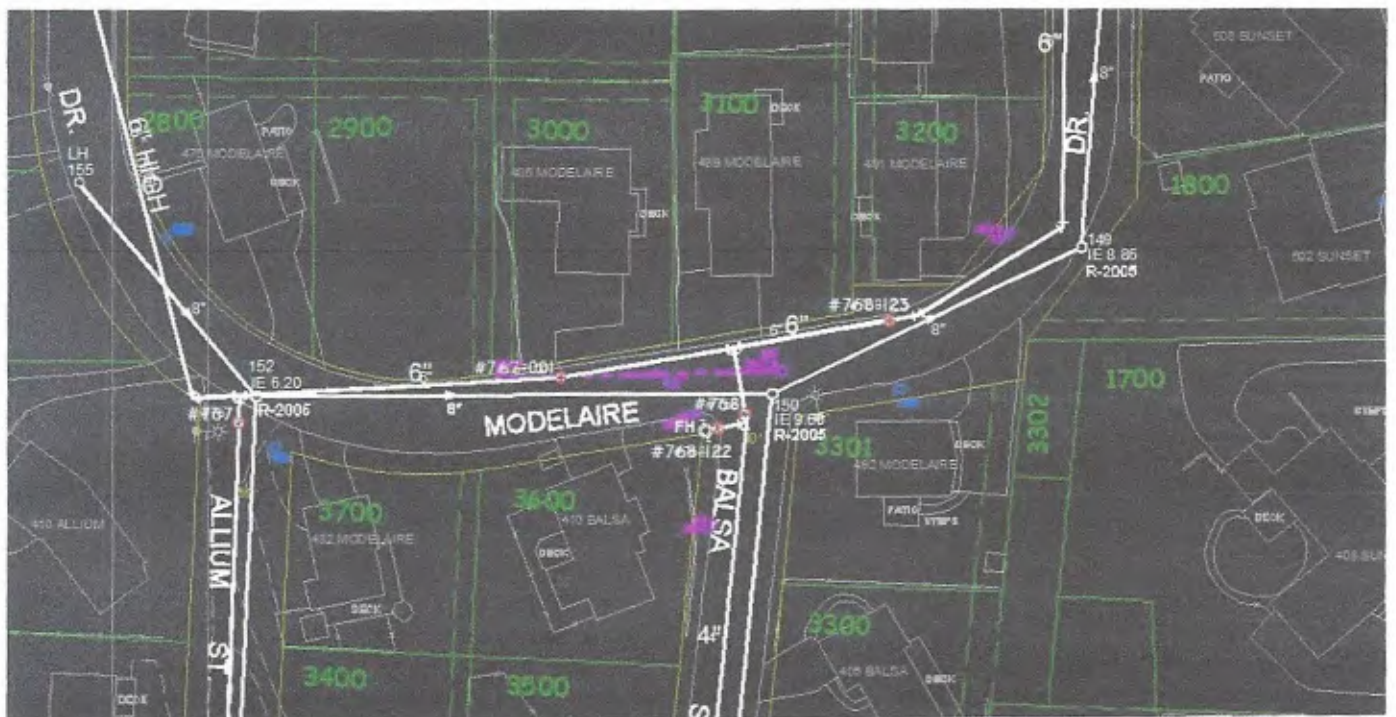
Let me know if there are any other specifications of these roadways that you are interested in that I have missed. Have a great weekend and thanks for the treats, the guys were very appreciative.

Kyle Carpenter, PE
Public Works Director
City of La Grande
Public Works
Ph: (541) 962-1325
Fax: (541) 963-4844

2 attachments

Hawthorne.jpg
150K

Modelaire.jpg
120K





attachment U2

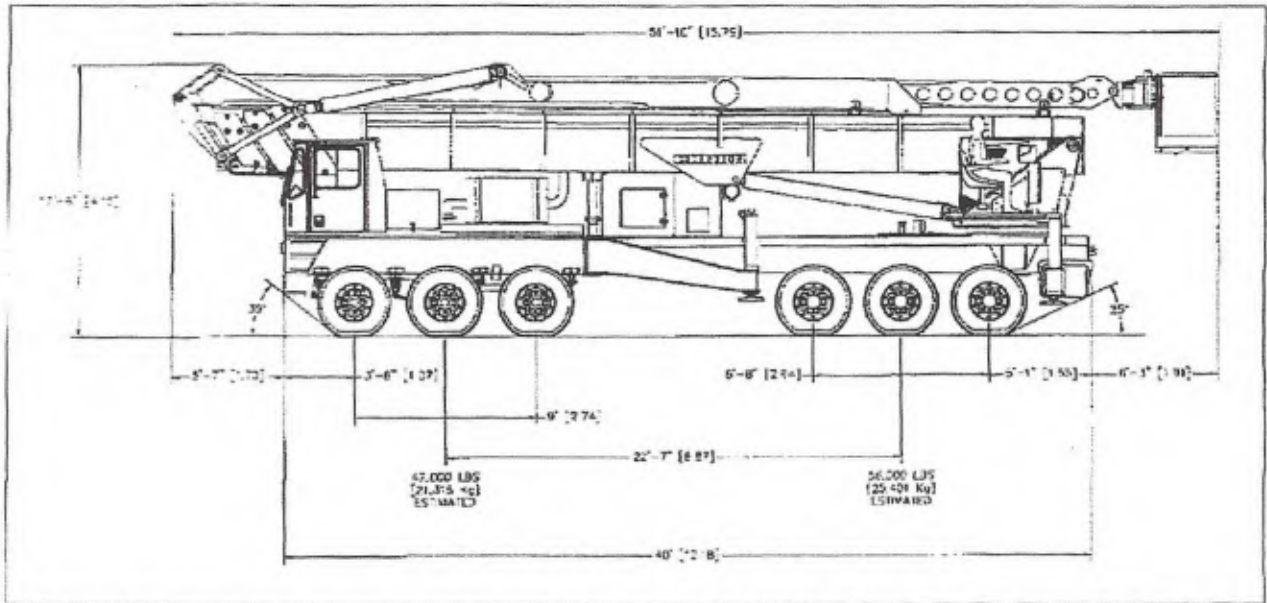


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

The following is a summary of anticipated equipment to be used for each transmission-line construction activity.

- Survey work: pickup trucks or ATVs.
- Timber removal: pickup trucks, feller bunchers, dump trucks, wood chippers.
- Road construction: pickup trucks, bulldozers, motor graders, and water trucks.
- Hole digging, installation of directly embedded structures, or foundation installation: pickup trucks, 2-ton trucks, digger derrick trucks, hole diggers, bulldozers, concrete trucks, water trucks, cranes, hydro cranes, wagon rock drills, dump trucks, and front-end loaders.
- Hauling lattice steel members, tubular poles, braces, and hardware to the structure sites: steel haul trucks, carry alls, cranes, and forklifts.
- Assembly and erection of structures: pickup trucks, 2-ton trucks, carry alls, cranes, and a heavy lift helicopter.
- Wire installation: pickups, wire reel trailers, diesel tractors, cranes, 5-ton boom trucks, splicing trucks, three drum pullers, single drum pullers, tensioner, sagging dozers, carry-alls, static wire reel trailers, bucket trucks, and a light duty helicopter.
- Final cleanup, reclamation, and restoration: pickup trucks, 2-ton trucks, bulldozers, motor graders, dump trucks, front-end loaders, hydro-seed truck, and water trucks.

The highest level of traffic will be when the wire stringing operations begin while several other operations are occurring at the same time, which will likely include ROW clearing, installing foundations, hauling steel, and assembling and erecting structures. For the station work, the highest level of traffic will be during site grading and foundation installation. For the communication station sites, the highest level of traffic will be during grading and site preparation.

Detailed estimates of trips generated by transporting Project construction equipment will be provided by the construction contractor prior to construction.

3.1.3 Traffic Related to Timber Removal

In forested areas, the Project will require removal of timber from the Project ROW and for construction and improvement of access roads. Specific timber harvest plans have not been finalized. Logs from timber clearing may be transported to nearby sawmills. Decisions regarding transportation routes for harvested timber will be made following completion of a timber harvest plan, and the number of log truck trips will be estimated when the timber harvest plan has been finalized. Logging slash will remain onsite if possible. For additional discussion regarding removal of timber in forested areas, see Exhibit K, Attachment K-2, ROW Clearing Assessment.

3.1.4 Impacts to V/C Ratios

Based on the estimated trip generation numbers in Tables 4 and 6, a maximum of approximately 1,294 daily one-way vehicle trips are expected within any one construction spread. To facilitate traffic and other analyses, the two construction spreads are divided into smaller sections based on similar construction windows and seasonal weather restrictions. Not all construction sections will have the same number of concurrent construction activities, depending on how the construction contractor sequences and executes the Project. Some sections will have fewer daily vehicle trips. For the purposes of the traffic analysis, the spreads are divided into five sections with multi-use areas that could have additive traffic impacts. The sections are assumed to have approximately equal levels of activity. The 1,294 daily one-way trips per spread divided over five sections of more concentrated traffic results in 259 daily one-

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

Upon the request of the La Grande City Council, a variety of street design standards have been reviewed and are now incorporated in the Land Development Code.

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

This classification will cover those streets that are designed to meet the standards for an expected life of twenty (20) years or more. The attached drawings shall be the minimum standard for those streets in this classification. All streets designated as Federal Aid Urban Streets (F.A.U.) shall be constructed under these design standards. Streets in this designation shall be constructed with sidewalks when at all possible in an effort to increase pedestrian safety. Collector streets are designed to withstand normal trucks of an HS 20 loading. Larger trucks are to utilize Arterial streets where at all possible. This level of development shall be the ultimate goal for all streets within the City of La Grande.

Possible means of financing available for this Class shall be methods A, B, C, D, E, F, G, and H in Section 6.6.006.

A. Advantages

1. The construction life is extended to a period above other City standards.
2. The visible aesthetics in relationship to having curbs and a blacktop surface with landscaping or concrete driveways and a sidewalk is generally appealing to the public.
3. Easy maintenance for the Public Works Department for cleaning and minor repair.
4. Storm sewer drainage is confined within the bounds of the curbs during minor flooding periods.
5. Parking is restricted to a solid barrier, that being the curb; this restricts parking in the area on the back side of the curb and confines travel to the street surface.
6. Defined areas for possible cross walks, signs, power poles, and other utilities that are restricted to the outside areas behind the curbs.
7. It allows for a wide range of financing methods and is to City standards for a ten (10) year Bancroft bonding.
8. Provides a dust free surface.

B. Disadvantages

1. The extreme high level of cost that is incurred with this type of development.

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

Streets constructed in this classification shall be constructed to the same standards as Class I Streets with the exception of the form of drainage system. These streets shall meet the standards as shown on the attached drawing. This level of construction shall be only utilized in substitution for Class I Streets when it is determined by the City Council at the recommendation of the City Engineer or Engineering Superintendent, that an adequate drainage system cannot be installed for a Class I Street.

Table 6. Construction Vehicle Trips per Day per Construction Spread

Construction Crew Type	Construction Vehicles					
	Light Construction Vehicles			Heavy Construction Vehicles		
	Number of Pickups/ Mechanic Trucks (per day)	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)	Number of Other Vehicles	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)
Substation Construction	20	2	40	5	2	10
ROW Clearing	9	4	36	5	4	20
Roads/ Pad Grading	9	4	36	9	2	18
Foundations	9	2	18	5	8	40
Tower Lacing (assembly)	27	2	54	0	0	0
Tower Setting (erection)	20	2	40	0	0	0
Wire Stringing	9	4	36	9	4	36
Restoration	3	2	6	0	0	0
Blasting	5	4	20	0	0	0
Material Delivery	20	8	160	12	2	24
Mechanic and Equipment Mgmt.	5	6	30	0	0	0
Refueling	0	0	0	5	4	20
Dust Control	0	0	0	5	4	20
Construction Inspection	5	8	40	0	0	0
Concrete Testing	5	4	20	0	0	0
Environmental Compliance	9	6	54	0	0	0
Surveyors	5	3	30	0	0	0
Totals	—	—	620	—	—	188

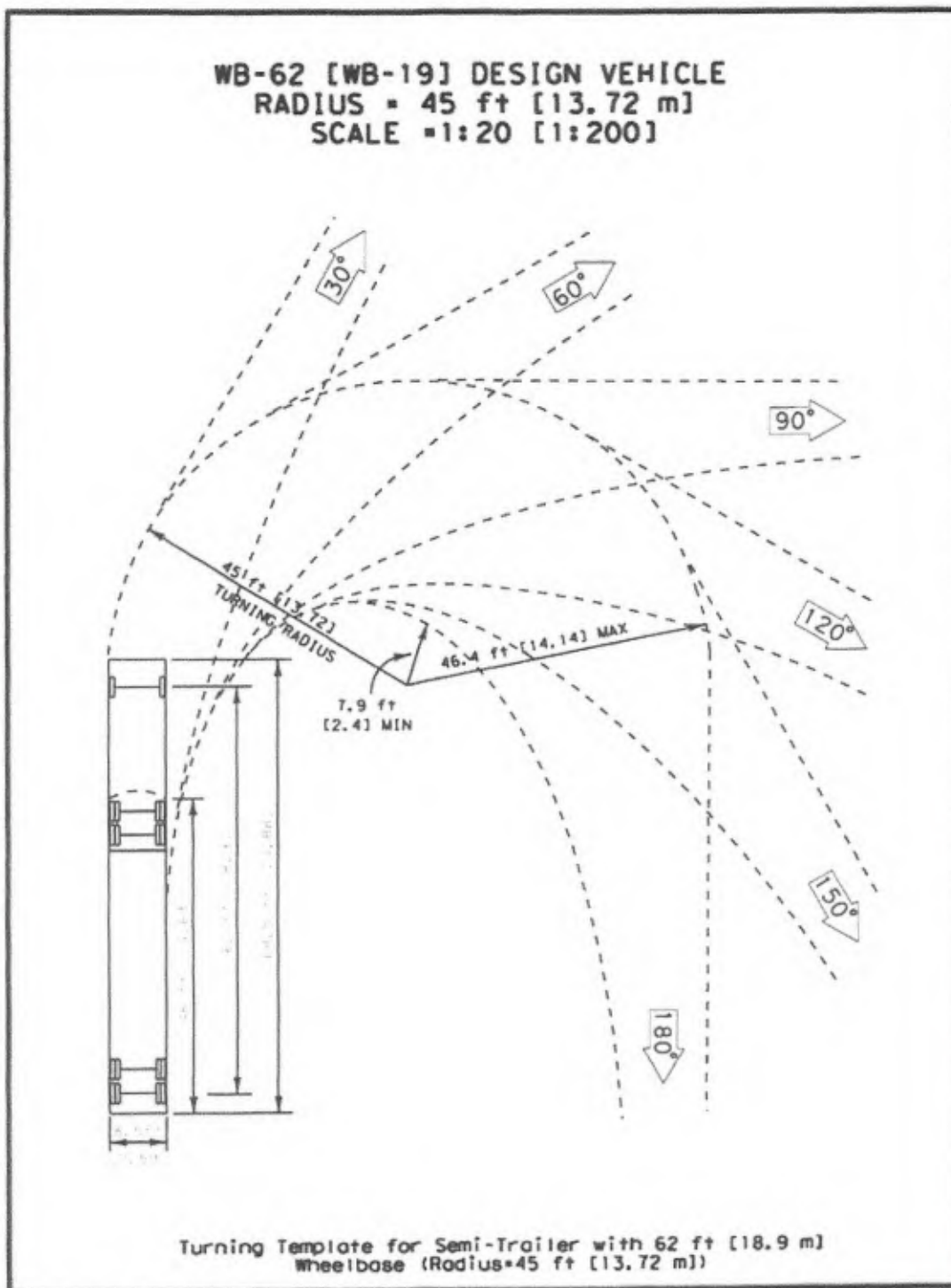
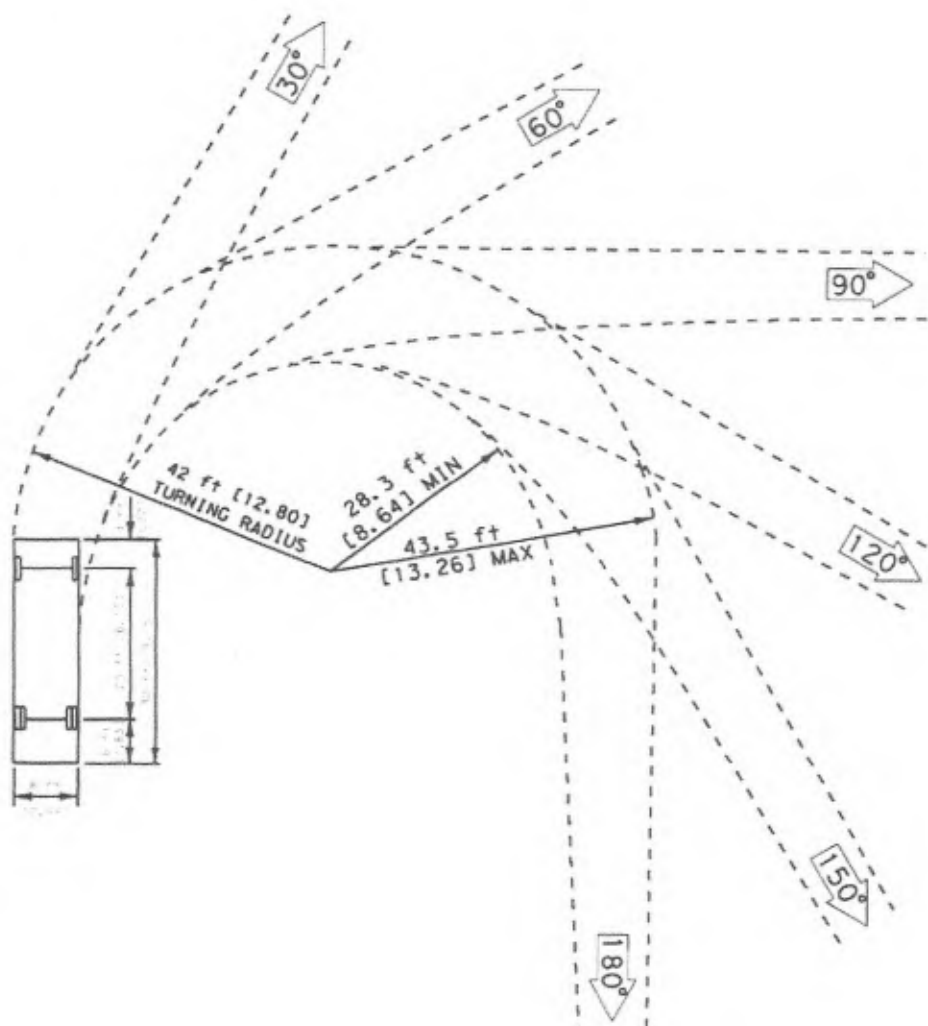


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

SINGLE UNIT (SU) TRUCK DESIGN VEHICLE
TURNING RADIUS = 42 ft [12.80 m]
SCALE = 1:20 [1:200]



Turning Template for Single Unit Trucks or Buses

Exhibit 15

**CITY OF LA GRANDE
ORDINANCE NUMBER 3077
SERIES 2009**

**AN ORDINANCE CONTROLLING VEHICULAR AND PEDESTRIAN TRAFFIC, PARADES
AND PROCESSIONS AND ISSUANCE OF PERMITS; PROVIDING PENALTIES; AND
REPEALING ORDINANCE NUMBER 2845, SERIES 1993; ALL AMENDING ORDINANCES
AND ALL OTHER ORDINANCES OR PARTS OF ORDINANCES IN CONFLICT HEREWITH;
AND DECLARING AN EFFECTIVE DATE**

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

Section 1. This Ordinance may be cited as the City of La Grande Uniform Traffic Ordinance.

Section 2. APPLICABILITY OF STATE TRAFFIC LAWS.

Oregon Revised Statutes, Chapter 153, and the Oregon Vehicle Code, ORS Chapter 801 and 822, as now constituted, are adopted by reference. Violation of an adopted provision of those chapters is an offense against the City.

Section 3. DEFINITIONS

In addition to those definitions contained in the Oregon state Motor Vehicle Code, the following words or phrases, except where the context clearly indicates a different meaning, shall mean:

a. Alley

A street or highway primarily intended to provide access to the rear or side of lots or buildings in urban areas and not intended for through vehicular traffic.

b. Bicycle

A bicycle is a vehicle that:

1. Is designed to be operated on the ground on wheels;
2. has a seat or saddle for use of the rider;
3. is designed to travel with not more than three (3) wheels in contact with the ground;
4. is propelled exclusively by human power; and,
5. has every wheel more than fourteen inches (14") in diameter or two (2) tandem wheels, either of which is more than fourteen inches (14") in diameter.

c. Bicycle Lane

That part of the highway, adjacent to the roadway, designated by official signs or markings for use by persons riding bicycles, except as otherwise specifically provided by law.

d. Bicycle Path

A public way, not part of a highway, which is designated by official signs or markings for use by persons riding bicycles, except as otherwise specifically provided by law.

e. Block

The part of one side of a street lying between the two (2) nearest cross streets.

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

The applicant shall submit an application to the City Manager or designee, showing the terminal points of the purported movement; the proposed route; the nature of the movement requested, including the weight and dimensions of the vehicle, load, machine, building, or structure to be moved; the time, date and duration of the proposed movement.

b. Special Movement Permit

A permit shall be required to move any vehicle, structure, or load on, or to access a street when, after preparation for movement, the vehicle, structure or load exceeds fourteen feet (14') in height, requires the use of guy wires, or could result in the blockage of a street. An approved application may serve as a permit, and a copy of the approved application shall be provided to the applicant.

Section 17. TRUCK ROUTES

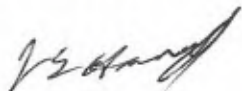
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, pounds specifically picking up deliveries or making deliveries to any business or residence located on a street that is not a truck route will be exempted if the vehicle is driven from the truck route to the destination in the shortest, most direct, and safest route.
- c. The use of Jacob brakes shall not be allowed within the city limits of La Grande, Oregon.
- d. Truck routes will be posted as follows:
 1. Walnut street north from the city limits to C Avenue;
 2. C Avenue east from Walnut Street to Gekeler Avenue;
 3. Gekeler Avenue east to the city limits;
 4. 12th street south from Gekeler Avenue to the city limits;
 5. 2nd Street south from the city limits to Adams Avenue;
 6. Monroe Avenue east from Spruce Street to Highway 82;
 7. Jackson Avenue east from Spruce Street, and
 8. Spruce Street south from the city limits to Monroe.

Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement officer may cause the vehicle to be towed and stored at the owner's expense. The owner shall be liable for the costs of towing and storing, notwithstanding that the vehicle was parked by another or that the vehicle was initially parked in a safe manner but subsequently became an obstruction or hazard.

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE



PRINTED NAME

James E. Howell II

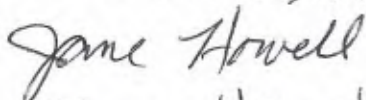
ADDRESS

482 Modelaire Dr

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j.howell12@frontier.com

SIGNATURE



PRINTED NAME

Jane Howell

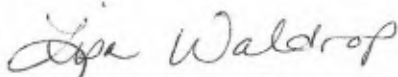
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PRINTED NAME

Lisa Waldrop

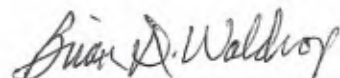
ADDRESS

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ldjw62@gmail.com

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PRINTED NAME

BRIAN D. WALDROP

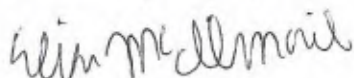
ADDRESS

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EMAIL

bdwaldrop58@gmail.com

SIGNATURE



PRINTED NAME

EUSE McILMAIL

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476 MODELAIRE DR.

EMAIL

mcilmail154@hotmail.com


I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

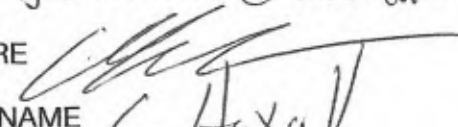

Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

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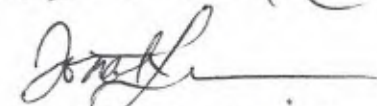

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SIGNATURE

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John Garutz

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John Garutz


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484 Hawthorne LG, OR 97850


EMAIL


I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

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SIGNATURE 
PRINTED NAME M. Jeannette Smith
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EMAIL kimheitstuman@hotmail.com

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE: 

PRINTED NAME Shawn K. Mangum

ADDRESS 2905 E. M. Ave,

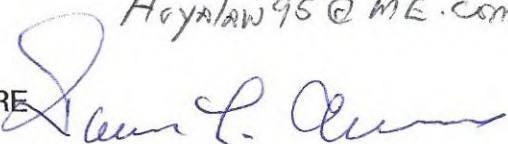
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CONNIE L. ALLEN 541-9637720
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SIGNATURE

PRINTED NAME

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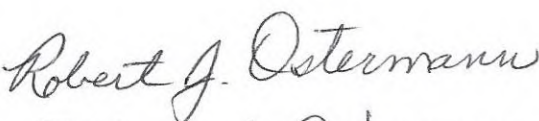

Linda Snyder
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PRINTED NAME

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Robert J. Ostermann
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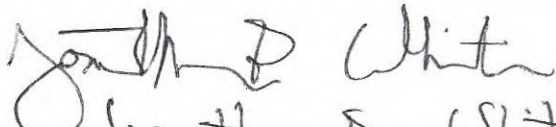
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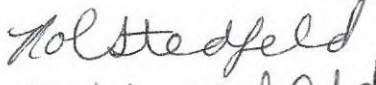
ADDRESS


EMAIL

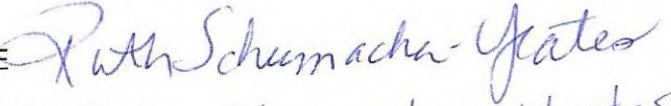

Robin J. Ostermann
495 Modelaire Dr La Grande, OR 97850

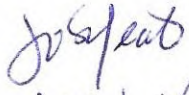
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ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 

PRINTED NAME LOIS BARRY

ADDRESS P.O. Box 566, La Grande, OR 97850

EMAIL loisbarry31@gmail.com

SIGNATURE 

PRINTED NAME CATHY WEBB

ADDRESS 1708 CEDAR ST. LAGRANDE, OR 97850

EMAIL thunkski@gmail.com

SIGNATURE 

PRINTED NAME Jack L. Martin

ADDRESS 1412 Gilcrest Dr. LaGrande

EMAIL Buff Martin 27 @GMail.com

SIGNATURE 

PRINTED NAME GERALDINE BRASETH-PALMER

ADDRESS 1602 GILDEREST DRIVE LA GRANDE, Ore 97850

EMAIL 


SIGNATURE 


PRINTED NAME Jean BAPH

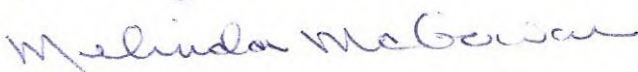
ADDRESS 1509 MADISON AVE LaGrande, OR 97850


EMAIL Jbaph19@gmail.com


I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 
PRINTED NAME Damon Sexton
ADDRESS 401 Balsa St La Grande, OR 97850
EMAIL Sexton.damon@gmail.com

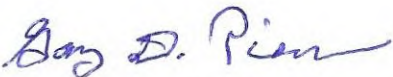
SIGNATURE 
PRINTED NAME Cory Sexton
ADDRESS 401 Balsa Street La Grande OR 97850
EMAIL Corytrix@gmail.com

SIGNATURE 
PRINTED NAME Melinda McGowan
ADDRESS 602 Sunset Dr.
EMAIL melindamegowan@gmail.com

SIGNATURE 
PRINTED NAME Keith D. Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL Keithdhudson@gmail.com

SIGNATURE 
PRINTED NAME Laura Elly Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL ellyhudson@gmail.com

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 

PRINTED NAME Gary D. Pierson

ADDRESS 489 Modelaire Drive, La Grande OR 97850

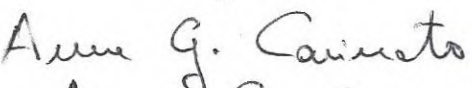
EMAIL —

SIGNATURE 

PRINTED NAME LYNN WHEELER DUNCAN

ADDRESS 489 Modelaire Drive, La Grande OR 97850

EMAIL rlwd1910@gmail.com

SIGNATURE 

PRINTED NAME Anne G. Cavinato

ADDRESS 86 Hawthorne Dr. La Grande, OR 97850


EMAIL acavinat@ecu.edu

SIGNATURE 

PRINTED NAME JOE HORST

ADDRESS 86 HAWTHORNE DR. LA GRANDE OR.

EMAIL joehorst@comi.com

SIGNATURE 

PRINTED NAME ANGELA Sherer

ADDRESS 91 W. Hawthorne Dr. LaGrande, OR 97850

EMAIL asherer@frontier.com

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
ADDRESS 97 W Hawthorne Dr, La Grande, Or. 97850
EMAIL asherer@pontier.com

SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
ADDRESS 492 Modelaire Dr. La Grande, OR 97850
EMAIL hnull@comi.com

SIGNATURE *Bert R. Frewing*
PRINTED NAME Bert R. Frewing
ADDRESS 709 South 12th Street La Grande, OR 97850
EMAIL jeanfrewing@gmail.com

SIGNATURE *Lindsey McCullough*
PRINTED NAME Lindsey McCullough
ADDRESS 406 Balsa St., La Grande, OR 97850
EMAIL lindz_mm91@hotmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE *Merle E. Comfort*
PRINTED NAME MERLE E. COMFORT
ADDRESS 209 SCORPIO DRIVE LA GRANDE OR 97850
EMAIL merlecomfort@gmail.com

SIGNATURE *Robin L. Maille*
PRINTED NAME Robin Maille
ADDRESS 401 Cedar St., La Grande
EMAIL r-maille@icloud.com

SIGNATURE *Bruce C Kevan*
PRINTED NAME *Bruce C Kevan*
ADDRESS 1511 W Ave LG
EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Bekeler Ln - La Grande, OR
EMAIL carolsummers1938@gmail.com

SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 NTH St. LaGrande - OR 97850
EMAIL

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
ADDRESS *406 4th St. LaGrande, PR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
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SIGNATURE
PRINTED NAME
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EMAIL

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:28 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order 5/23/2019
Attachments: Scan 2019-8-15 17.14.06.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter sign by me and 46 other residents of La Grande expressing our concerns regarding the B2H Project and requesting that EFSC Deny the Site Certificate.

I have also sent a bound copy of this material by US Postal Service.

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, Oregon. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that that will impact the west hills and the area below.

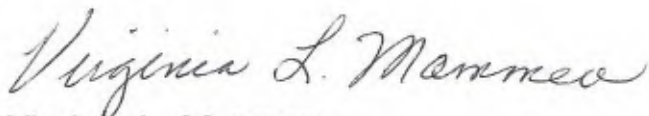
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140dBA at the blast location or over 90 dBA within 500 feet." This sounds oh so "don't worry about it, it will be OK just over in a split second." Living in this area off Modelaire Drive, I don't find this at all comforting. And the fact that this will be overseen by properly licensed personnel and all of the necessary authorizations doesn't help anything either.

The area in question, which for such inordinate construction is extremely close to many residents, has been my home for over 50 years and during

related medical problems and exhibit various reactions to loud noises.¹⁰
These children also live in the neighborhoods to be affected by the noise so they would be impacted coming and going to school, at home and also while at school. To impose the constant possibility of loud noises is cruel, disrespectful and totally unacceptable. ¹¹

For a project like this involving blasting and heavy machinery noise so close to homes, schools, and medical facilities impacting hundreds of peoples' daily lives, the day to day agitation, wondering what is coming next, fear and being on constant alert are not just addressed by some type of mitigation but must be addressed by a route that is much less impactful to peoples' safety, sanity, and health.

Sincerely,

A handwritten signature in cursive script that reads "Virginia L. Mammen".

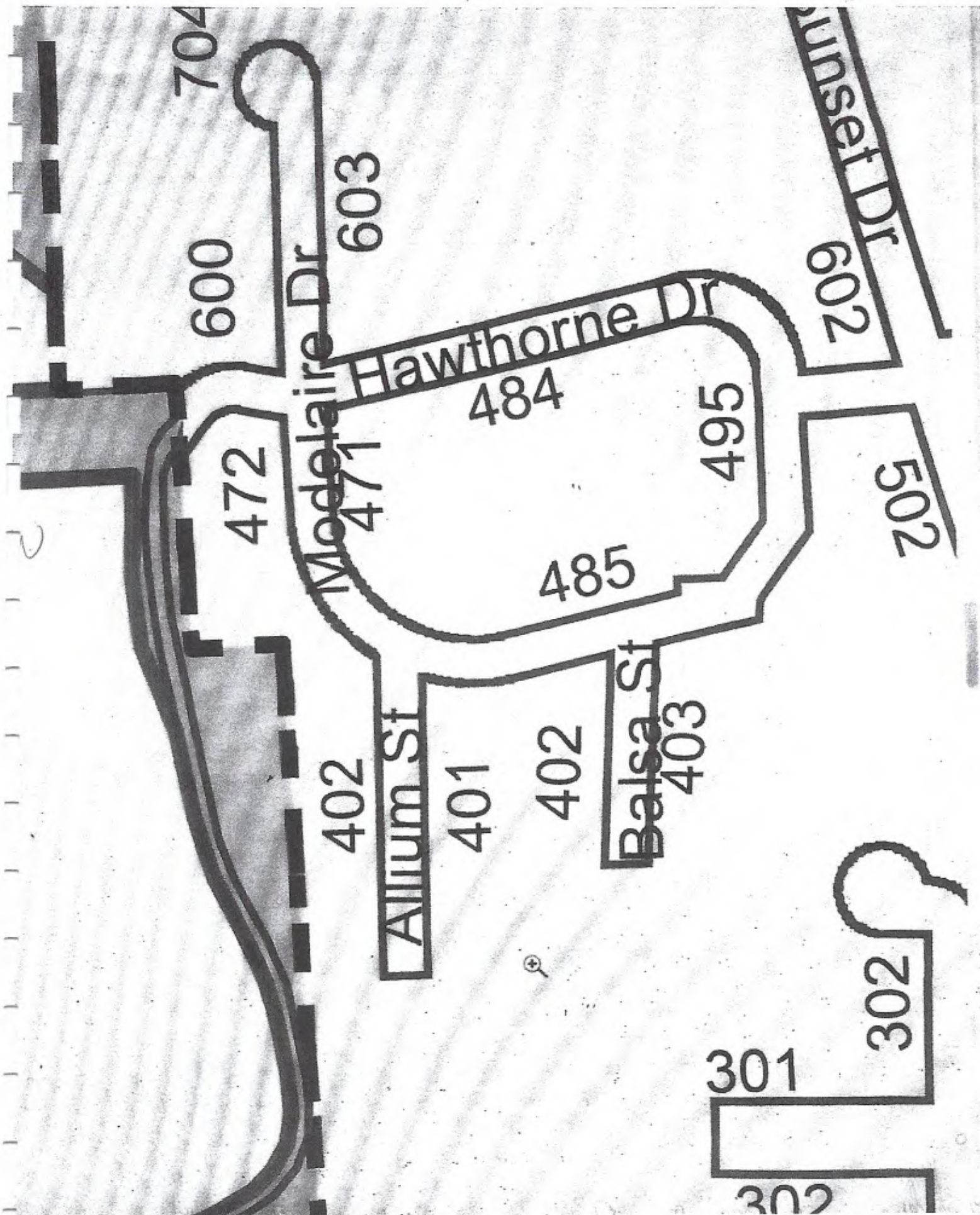
Virginia L. Mammen

405 Balsa

La Grande, Oregon 97850

gmammen@eoni.com

N



3.3 Predicted Noise Levels

OAR 345-021-0010(1)(x)(A): Predicted noise levels resulting from construction and operation of the proposed facility.

3.3.1 Construction Noise

3.3.1.1 Predicted Construction Noise Levels

Project construction will occur sequentially, moving along the length of the Project route, or in other areas such as near access roads, structure sites, conductor pulling sites, and staging and maintenance areas. Overhead transmission line construction is typically completed in the following stages, but various construction activities may overlap, with multiple construction crews operating simultaneously:

- Site access and preparation
- Installation of structure foundations
- Erecting of support structures
- Stringing of conductors, shield wire, and fiber-optic ground wire

The following subsections discuss certain construction activities that will periodically generate audible noise, including blasting and rock breaking, implosive devices used during conductor stringing, helicopter operations, and vehicle traffic.

Blasting and Rock Breaking

Blasting is a short-duration event as compared to rock removal methods, such as using track rig drills, rock breakers, jackhammers, rotary percussion drills, core barrels, or rotary rock drills. Modern blasting techniques include the electronically controlled ignition of multiple small-explosive charges in an area of rock that are delayed fractions of second, resulting in a total event duration that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140 dBA at the blast location or over 90 dBA within 500 feet.

Lattice tower foundations for the Project typically will be installed using drilled shafts or piers; however, if hard rock is encountered within the planned drilling depth, blasting may be required to loosen or fracture the rock to reach the required depth to install the structure foundations. Final blasting locations will not be identified until an investigative geotechnical survey of the analysis area is conducted during the detailed design.

The contracted blasting specialist will prepare a blasting plan that demonstrate compliance with applicable state and local blasting regulations, including the use of properly licensed personnel and the acquisition of necessary authorizations. The Framework Blasting Plan is set forth in Exhibit G, Attachment G-5.

Implosive Devices

An implosive conductor splice consists of a split-second detonation with sound and flash. Implosive splicing activities are anticipated to be limited to daytime hours. A blasting plan will be developed by an individual certified and licensed to perform the work. The plan will communicate all safety and technical requirements including, but not limited to, delineation of the controlled access zone and distance away from residences.

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety. Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



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Department of Environmental Quality

Chapter 340

Division 35

NOISE CONTROL REGULATIONS

340-035-0035**Noise Control Regulations for Industry and Commerce****(1) Standards and Regulations:**

(a) **Existing Noise Sources.** No person owning or controlling an existing industrial or commercial noise source shall cause or permit the operation of that noise source if the statistical noise levels generated by that source and measured at an appropriate measurement point, specified in subsection (3)(b) of this rule, exceed the levels specified in Table 7, except as otherwise provided in these rules. [Table not included. See ED. NOTE.]

(b) New Noise Sources:

(A) **New Sources Located on Previously Used Sites.** No person owning or controlling a new industrial or commercial noise source located on a previously used industrial or commercial site shall cause or permit the operation of that noise source if the statistical noise levels generated by that new source and measured at an appropriate measurement point, specified in subsection (3)(b) of this rule, exceed the levels specified in Table 8, except as otherwise provided in these rules. For noise levels generated by a wind energy facility including wind turbines of any size and any associated equipment or machinery, subparagraph (1)(b)(B)(iii) applies. [Table not included. See ED. NOTE.]

(B) New Sources Located on Previously Unused Site:

(i) No person owning or controlling a new industrial or commercial noise source located on a previously unused industrial or commercial site shall cause or permit the operation of that noise source if the noise levels generated or indirectly caused by that noise source increase the ambient statistical noise levels, L10 or L50, by more than 10 dBA in any one hour, or exceed the levels specified in Table 8, as measured at an appropriate measurement point, as specified in subsection (3)(b) of this rule, except as specified in subparagraph (1)(b)(B)(iii).

(ii) The ambient statistical noise level of a new industrial or commercial noise source on a previously unused industrial or commercial site shall include all noises generated or indirectly caused by or attributable to that source including all of its related activities. Sources exempted from the requirements of section (1) of this rule, which are identified in subsections (5)(b)-(f), (j), and (k) of this rule, shall not be excluded from this ambient measurement.

(iii) For noise levels generated or caused by a wind energy facility:

(I) The increase in ambient statistical noise levels is based on an assumed background L50 ambient noise level of 26 dBA or the actual ambient background level. The person owning the wind energy facility may conduct measurements to determine the actual ambient L10 and L50 background level.

(II) The "actual ambient background level" is the measured noise level at the appropriate measurement point as specified in subsection (3)(b) of this rule using generally accepted noise engineering measurement practices. Background noise measurements shall be obtained at the appropriate measurement point, synchronized with wind speed measurements of hub height conditions at the nearest wind turbine location. "Actual ambient background level" does not include noise generated or caused by the wind energy facility.

(III) The noise levels from a wind energy facility may increase the ambient statistical noise levels L10 and L50 by more than 10 dBA (but not above the limits specified in Table 8), if the person who owns the noise sensitive property executes a legally effective easement or real covenant that benefits the property on which the wind energy facility is located. The easement or covenant must authorize the wind energy facility to increase the ambient statistical noise levels, L10 or L50 on the sensitive property by more than 10 dBA at the appropriate measurement point.

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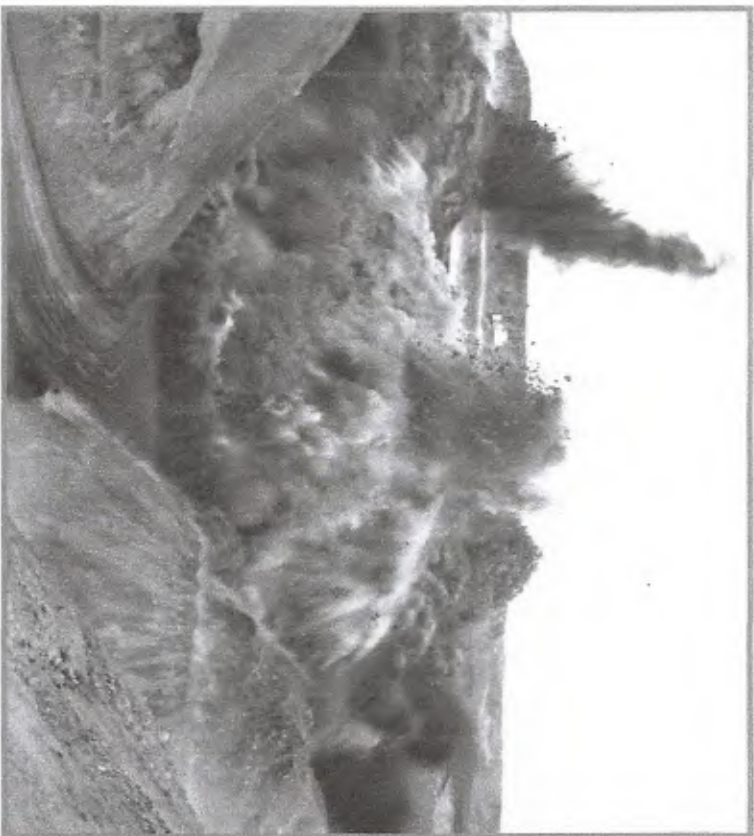
- (2) Compliance. Upon written notification from the Director, the owner or controller of an industrial or commercial noise source operating in violation of the adopted rules shall submit a compliance schedule acceptable to the Department. The schedule will set forth the dates, terms, and conditions by which the person responsible for the noise source shall comply with the adopted rules.
- (3) Measurement:
- (a) Sound measurements procedures shall conform to those procedures which are adopted by the Commission and set forth in Sound Measurement Procedures Manual (NPCS-1), or to such other procedures as are approved in writing by the Department;
- (b) Unless otherwise specified, the appropriate measurement point shall be that point on the noise sensitive property, described below, which is further from the noise source:
- (A) 25 feet (7.6 meters) toward the noise source from that point on the noise sensitive building nearest the noise source;
- (B) That point on the noise sensitive property line nearest the noise source.
- (4) Monitoring and Reporting:
- (a) Upon written notification from the Department, persons owning or controlling an industrial or commercial noise source shall monitor and record the statistical noise levels and operating times of equipment, facilities, operations, and activities, and shall submit such data to the Department in the form and on the schedule requested by the Department. Procedures for such measurements shall conform to those procedures which are adopted by the Commission and set forth in Sound Measurement Procedures Manual (NPCS-1);
- (b) Nothing in this rule shall preclude the Department from conducting separate or additional noise tests and measurements. Therefore, when requested by the Department, the owner or operator of an industrial or commercial noise source shall provide the following:
- (A) Access to the site;
- (B) Reasonable facilities, where available, including but not limited to, electric power and ladders adequate to perform the testing;
- (C) Cooperation in the reasonable operation, manipulation, or shutdown of various equipment or operations as needed to ascertain the source of sound and measure its emission.
- (5) Exemptions: Except as otherwise provided in subparagraph (1)(b)(B)(ii) of this rule, the rules in section (1) of this rule shall not apply to:
- (a) Emergency equipment not operated on a regular or scheduled basis;
- (b) Warning devices not operating continuously for more than 5 minutes;
- (c) Sounds created by the tires or motor used to propel any road vehicle complying with the noise standards for road vehicles;
- (d) Sounds resulting from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad only to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576; but this exemption does not apply to any standard, control, license, regulation, or restriction necessitated by special local conditions which is approved by the Administrator of the EPA after consultation with the Secretary of Transportation pursuant to procedures set forth in Section 17(c)(2) of the Act;
- (e) Sounds created by bells, chimes, or carillons;
- (f) Sounds not electronically amplified which are created by or generated at sporting, amusement, and entertainment events, except those sounds which are regulated under other noise standards. An event is a noteworthy happening and does not include informal, frequent, or ongoing activities such as, but not limited to, those which normally occur at bowling alleys or amusement parks operating in one location for a significant period of time;
- (g) Sounds that originate on construction sites.
- (h) Sounds created in construction or maintenance of capital equipment;
- (i) Sounds created by lawn care maintenance and snow removal equipment;
- (j) Sounds generated by the operation of aircraft and subject to pre-emptive federal regulation. This exception does not apply to aircraft engine testing, activity conducted at the airport that is not directly related to flight operations, and any other activity not pre-emptively regulated by the federal government or controlled under OAR 340-035-0045;

Controlling the Adverse Effects of Blasting

This module addresses the control of offsite impacts that result from blasting, namely:

- vibrations,
- airblast, and
- flyrock.

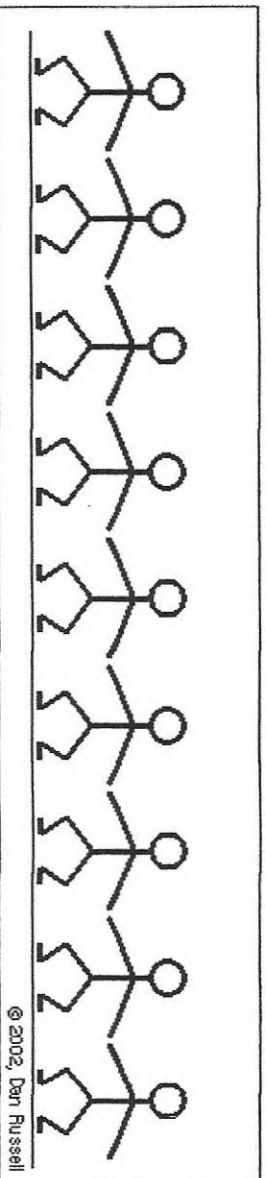
Much of the information in the module is derived from the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The performance standards apply to all surface coal mines. Similar standards have been adopted on some State and local levels and applied to non-coal blasting operations such as quarrying and construction.



Part I: Ground Vibrations, Airblast, and Flyrock

Exhibit 5b

Explosive energy is used to break rock. However, the use of this energy is not 100-percent efficient. Some of the energy escapes into the atmosphere to generate **airblast or air vibrations**. Some of the energy also leaves the blast site through the surface soil and bedrock in the form of **ground vibrations**.



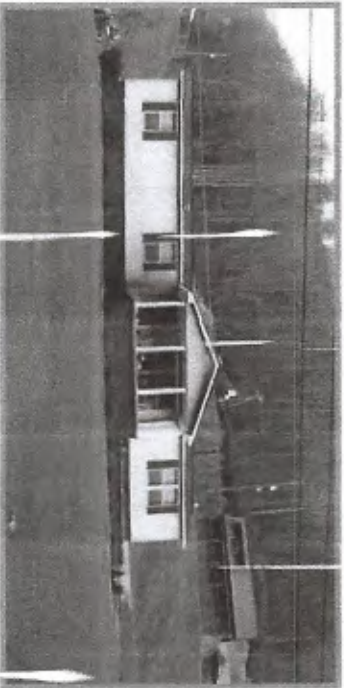
Both air and ground vibrations create waves that disturb the material in which they travel. When these waves encounter a structure, they cause it to shake. Ground vibrations enter the house through the basement and airblast enters the house through the walls and roof.

Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior noise" will alarm and startle people living in the house.

Flyrock is debris ejected from the blast site that is traveling through the air or along the ground. Flyrock the single most dangerous adverse effect that can cause property damage and personal injury or death.

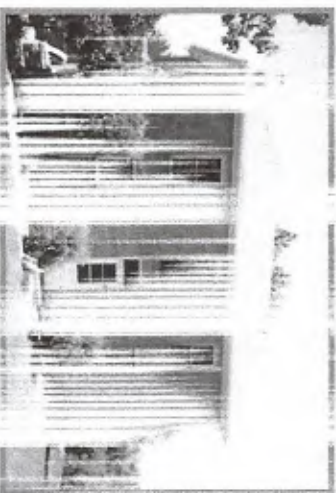
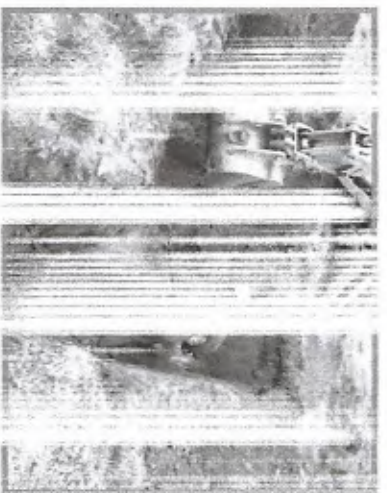
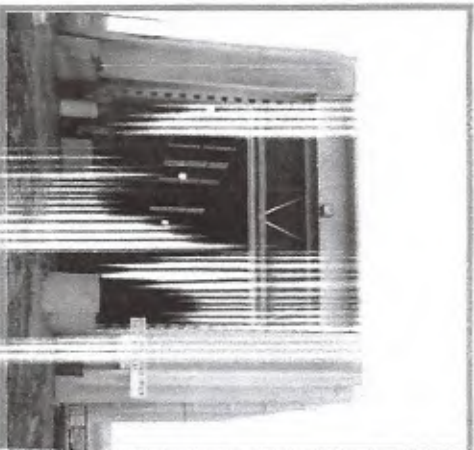
Blasting Impacts on Structures

Both above-ground and below-ground structures are susceptible to vibration impacts. Structures can include onsite mine offices and buildings, as well as offsite residences, schools, churches, power-transmission lines, and buried pipelines. Some of these structures may include historic or cultural features sensitive to even low levels of vibrations.



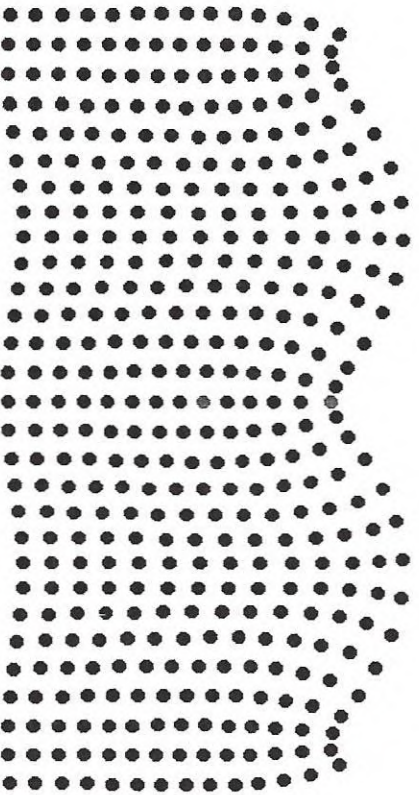
It is important to understand:

1. the causes of ground vibrations and airblast, and
2. what practices can be followed to control and minimize the adverse effects



Ground Vibrations

Ground vibrations propagate away from a blast site as Rayleigh (or surface) waves. These waves form a disturbance in the ground that displaces particles of soil or rock as they pass by. Particle motions are quite complicated. At the ground surface (free boundary), measured particle motions have the greatest displacements, and displacements decrease with depth (see the illustration below). At a depth of between 20 to 50 feet below ground surface, particle displacements are barely detectable. Structures that are well coupled to the ground tend to move with this motion; structures buried in the ground are less affected by surface motions.



©1999, Daniel A. Russell

Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

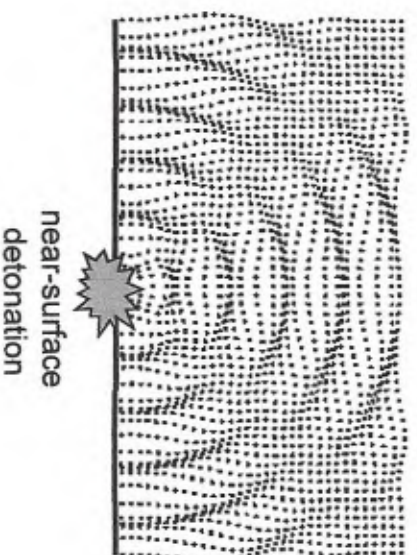
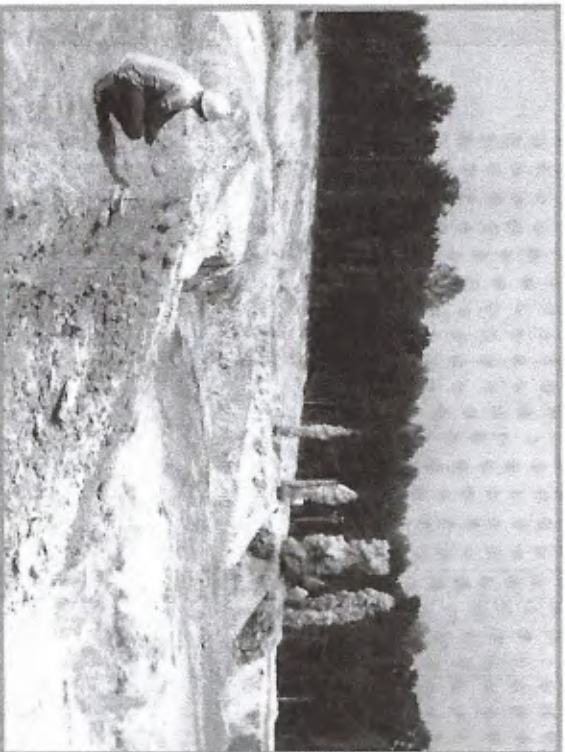
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

2 Airblast is measured as a pressure in pounds per square
5 inch (psi) and is often reported in terms of **decibels (dB)**.

Airblast is a pressure wave that that may be audible or in-audible. Elevated airblast levels are generated when explosive energy in the form gases escape from the detonating blast holes. Energy escapes either through the top stemming or through fractures in the rock along the face or at the ground surface.

Exhibit 7



Airblast radiates outward from the blast site in all directions and can travel long distances. Sound waves travel much slower (1,100 ft/s) than ground vibrations (about 5,000 – 20,000 ft/s). Hence, airblast arrives at offsite structures later than do ground vibrations.

Both ground vibrations and airblast cause structures to shake structures. Occupants in structures that are located far from a blast may experience shaking from vibration and airblast as two separate, closely spaced events. This can be particularly bothersome, as it prolongs the duration of structure shaking and leads the property owner to think that two separate blasts occurred.

Structure Response

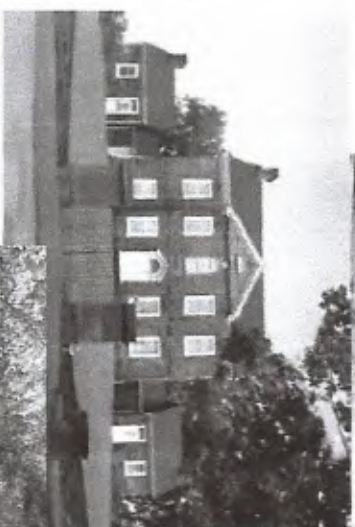
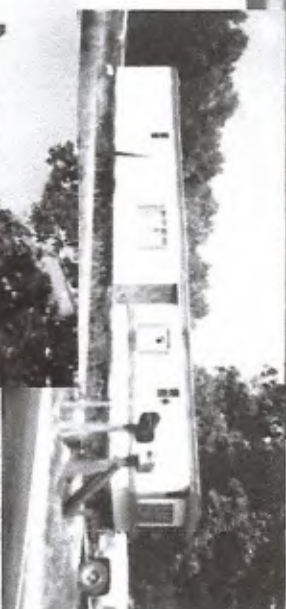
As ground and air vibrations reach a structure, each will cause it to shake. Structure response is dependant on the vibration characteristics (frequency and amplitude) and structure type.

Ground Vibrations enter the house through the basement. This is like shaking the bottom of a flag pole. Movement at the top of the pole depends on how (frequency) and how hard (amplitude) the bottom of the pole is shaken. If shaken at just the right pace, or at the pole's natural frequency, the top will move significantly compared to the bottom. Motion at the top is amplified from the bottom motion.

All blast damage studies have measured incoming ground vibrations at the ground surface. The observed structure amplifications were typically between 1 to 4 times the ground vibration. Structure response below ground level is the same or less than the incoming vibrations

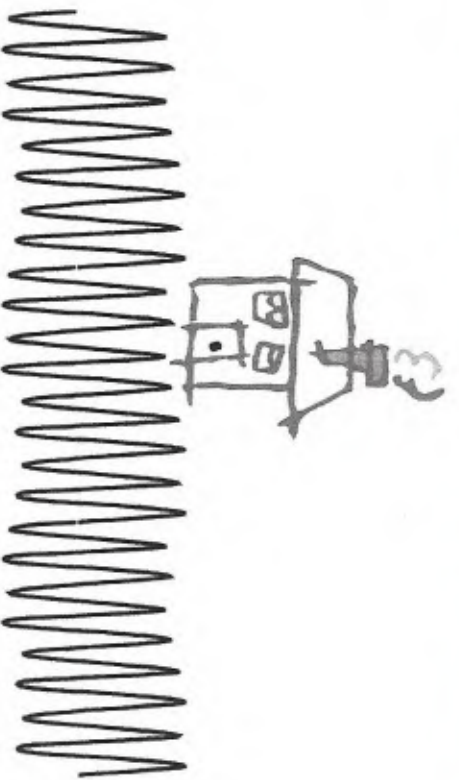
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

Due to the different arrival times of ground and air vibrations, occupants may feel two distinct impacts on the house.



Ground Vibration Structure Response

Exhibit 59



High frequencies do not promote structure shaking. The length of a single high-frequency wave cycle is short as compared with the dimension of a structure. A structure does not significantly respond to high frequencies.

On the other hand, low-frequency wave cycles are long as compared with the dimensions of structures. Accordingly, low frequencies tend to efficiently couple energy into structures and to promote higher-amplitude, long-duration shaking.



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A noisy problem

People often become more sensitive to noise as they age, which can affect their mental and physical health.

Published: March, 2019



Image: © Juanmonino/Getty Images

Are you more sensitive to noises than you used to be? Do certain sounds now feel too loud and jarring? Don't worry; it's actually quite normal.

Age-related hearing loss is common among older adults and affects about two-thirds of men in their 70s and 85% of men ages 80 and older. Although it's not clear why, this can also make people hypersensitive to sounds that they used to tolerate easily, which in turn can affect their well-being.

"Exposure to noises from crowds, traffic, and other everyday sounds can become harder to tolerate and increase stress levels, leading to anxiety and a reduction in overall quality of life," says Dr. Stephanie Tompkins, an audiologist with Harvard-affiliated Massachusetts Eye and Ear. "As your sensitivity to noises increases, this can lead to greater isolation, too, as you may try to avoid potentially noisy places and situations."

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Quiet in the Hospital: How Noise...

Quiet in the Hospital: How Noise Reduction Helps Patients Heal

on June 7, 2018 (<https://medcenterblog.uvmhealth.org/innovations/hospital-noise-reduction/>) in Innovation
(<https://medcenterblog.uvmhealth.org/category/innovations/>) by UVM Medical Center
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Noise. It is present in almost every aspect of our lives. From the traffic in the streets, to the fan that provides us white noise in the background to sleep, noise exists. Unfortunately, like stress, too much of it can have a negative impact on a person's health and rest. Some sounds we do like to hear, such as birds chirping, signaling spring in Vermont, but what about sounds in a hospital?

Many of us get admitted to hospitals when we are too sick to take care of ourselves at home. We expect exceptional care from physicians and nurses and, of course, to rest in order to help our bodies heal. We understand that some noises in a hospital are necessary for care; however, others simply aren't.

The Sounds of a Hospital

Many organizations, including the UVM Medical Center, have high tech equipment, which greatly assists in the delivery of care to our patients, but can also be noisy. Sometimes, healthcare providers are the source of the noise as we interact and communicate with our patients and other health team members.

Another factor is visits from families and friends during visiting hours. It is difficult when one's roommate is trying to rest in the opposite bed. Yet, we need to be cognizant of noise in patient care areas as sounds can be magnified and misinterpreted, increasing agitation and even confusion for some patients.

We become accustomed to the noise; our patients are not.

The Research on Noise, Quiet, and Healing

Research has shown that noise plays a negative role in healing and that decreasing noise in patient care areas aids in healing processes and helps facilitate speedier recoveries for patients. Patients are able to heal, sleep better and recover more quickly when able to rest. A quieter environment can also help decrease burnout for hospital staff.

Studies show that patients are more likely to develop negative side effects from a noisy hospital, such as sleep disturbances, elevated blood pressure and heart rate, and increased use of pain medications.

Noise can also increase annoyance levels for staff. One study indicated noise, such as talking inside and outside patient rooms, is the most common source of noise as well as visitors' voices, TVs, and behaviors of other patients.

Research concluded that best practices to eliminate noise from talking included staff education about noise reduction, public indicators such as sound monitors, a quiet time protocol, and lower cost environmental fixes, such as fixing noisy doors and squeaky wheels. Lastly, by introducing scripting with routine monitoring, patients' perception of quietness increased and the perception of noise decreased.

How We Address Noise at the UVM Medical Center

We introduced the "Culture of Quiet" Organizational initiative. The Nursing Professional Governance Patient and Family Experience Global council continued this work. After convening a small task force of nurses and assessing current quiet strategies, we introduced the following tactics:

- Many hospital units have designated 'quiet hours' with automatically dimming of lights at quiet hour intervals.
- Signage is visible in most patient care areas to help keep patients, family, and visitors aware. Throughout the hospital, you will see signs with a relaxing pair of Adirondack chairs and the sun setting with details on when a unit has quiet hours.
- Many semi-private rooms have windows in doors, so doors can be closed allowing for patient rest.
- We offer headphones for TVs and earplugs to help minimize sounds.
- In-patient kits contain a sleeping mask and other comfort items that can be provided at time of admission. Each kit contains a card and explains, 'the best healing occurs in a quiet environment.'
- New education material is available for staff, patients and visitors-just ask to review the next time visiting.
- Some units offer white noise machines, others have this built in.
- Noisy equipment such as wheels and doors can be tagged and replaced.
- Our facility and distribution staff have changed their cleaning and supply delivery schedules to accommodate patient care.
- Healthcare teams within the hospital are focusing efforts to cluster patient care to minimize interruptions to provide restful moments.

How you can help us.

We ask patients and visitors to hold us accountable when sounds are too loud. We want our community to alert us when noise levels are high and we will do what we can to minimize sound. In turn, we ask that all members of the healthcare team, patients, family, and friends be aware to keep voices soft, cell phones on vibrate, and hold each other accountable for these are the times of the day when our patients take pause to rest and positively impact their healing.

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Dangerous Decibels: Hospital Noise More Than a Nuisance

By Diane Sparacino, Staff Writer

Imagine a world where hospitals have become so noisy that the annoyance has topped hospital complaints, even more than for the tasteless, Jell-O-laden hospital food (Deardorff, 2011). If you're a nurse, you know that we're already there – with noise levels reaching nearly that of a chainsaw (Garcia, 2012). In fact, for more than five decades, hospital noise has seen a steady rise (ScienceDaily, 2005).

But it wasn't always that way. At one time, hospitals were virtually noise-free like libraries – respected spaces, preserved as quiet zones. The culture was such that a loud visitor might be silenced by a nurse's purposeful glare or sharply delivered "Shhh!" As early as 1859, the importance of maintaining a quiet environment for patients was a topic for discussion. In Florence Nightingale's book, "Notes on Nursing," she described needless noise as "the most cruel absence of care" (Deardorff, 2011).

Fast forward to 1995, when the World Health Organization (WHO) outlined its hospital noise guidelines, suggesting that patient room sound levels not exceed 35 decibels (dB). Yet since 1960, the average daytime hospital noise levels around the world have steadily risen to more than double the



acceptable level (from 57 to 72 dB), with nighttime levels increasing from 42 to 60 dB. WHO found that the issue was not only pervasive, but high noise levels remained fairly consistent across the board, despite the type of hospital (ScienceDaily, 2005).

Researchers at Johns Hopkins University began to look into the noise problem in 2003. They maintained that excessive noise not only hindered the ability for patients to rest, but raised the risk for medical errors. Other studies blamed hospital noise for a possible increase in healing time and a contributing factor in stress-related burnout among healthcare workers (ScienceDaily, 2005).

Technology is, of course, partly to blame. State-of-the-art machines, banks of useful alarms, respirators, generators, powerful ventilation systems and intercoms all add up to a lot of unwanted racket. When human voices are added to the mix, (i.e., staff members being forced to speak loudly over the steady din of medical equipment), it's anything but a restful environment. For the recovering patient in need of sleep, that can be a real issue (Deardorff, 2011).

Contributing to the problem, experts say, are the materials used in hospitals. Because they must be easily sanitized, surfaces cannot be porous where they could harbor disease-causing organisms. Rather than using noise-muffling materials like carpet, acoustic tiles and other soft surfaces, hospitals have traditionally been outfitted using smooth, hard surfaces – especially in patient rooms. Good for cleanliness – not so great for dampening sounds, which tend to bounce around the typical hospital (Deardorff, 2011).

Which brings us to the most recent research, published January 2012 in the *Archives of Internal Medicine*. In the report, Jordan Yoder, BSE, from the Pritzker School of Medicine, University of Chicago, and his colleagues associated elevated noise levels with "clinically significant sleep loss among hospitalized patients," perhaps causing a delay in their recovery time (Garcia, 2012). During the 155-day study period, researchers examined hospital sound levels. The numbers far exceeded (WHO) recommendations for average hospital-room noise levels, with the peak noise at an average 80.3 dB – nearly as loud as a chainsaw or electric sander (85 dB), and well over the recommended maximum of 40 dB. And while nights tended to be quieter, they were still noisier than recommended allowances, with "a mean maximum sound level of 69.7 dB" (Garcia, 2012).

Perhaps most interestingly, the researchers broke down the sources of noise into categories: "Staff conversation (65%), roommates (54%), alarms (42%), intercoms (39%), and pagers (38%) were the most common sources of noise disruptive reported by patients" (Garcia, 2012). "Despite the importance of sleep for recovery, hospital noise may put patients at risk for sleep loss and its associated negative effects," they wrote. In addition, researchers found that the intensive care and surgical wards had some work to do in dampening noise levels, with ICU peaking at 67 dB and 42 dB for surgical areas. Both far exceeded WHO's 30 dB patient room recommendation (Garcia, 2012).

Besides patient sleep deprivation, which itself can lead to a multitude of health problems including high blood sugar, high blood pressure and fatigue, studies have reported that elevated noise levels can increase heart and respiratory rates, blood pressure and cortisol levels. Recovery room noise causes patients to request more pain medication, and preterm infants "are at increased risk for hearing loss, abnormal brain and sensory development, and speech and language problems when exposed to prolonged and excessive noise" (Deardorff, 2011).

There is still more research to be done, of course, but Yoder and his colleagues had good news, as well; much of the hospital noise they identified is modifiable, suggesting that hospitals can take steps to successfully create a quieter environment for both patients and healthcare providers (Garcia, 2012).

Around the country, "quiet campaigns" have been launched by hospitals in an attempt to dampen nighttime noise. Besides dimming lights and asking staff to keep their voices down at night, they are working to eliminate overhead paging systems, replace wall and/or floor coverings – even the clang of metal trashcans. Northwestern's Prentice Women's Hospital in Chicago was built with noise reduction in mind, replacing the idea of centralized nursing stations with the advent of smaller, multiple stations (Deardorff, 2011)

Billed as "one of the nation's largest hospital construction projects," Palomar Medical Center in North San Diego County is a state-of-the-art facility that has been designed "to encourage quietness," according to Tina Pope, Palomar Health Service Excellence Manager. Slated to open its doors this August, the hospital will feature a new nursing call system to route calls directly to staff and help eliminate the need for overhead paging, de-centralized nursing stations and clear sig lines, allowing staff to check on patients without having to leave unit doors open. With measures already in place including "Quiet Hospital" badges on staff and posters at the entrance of every unit, a "Quiet at Night" campaign (9 p.m. – 6 a.m.), and a "Quiet Champions" program that encourages staff to report noise problems, Palomar is one of a growing number of hospitals working toward a new era of quiet.

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Noises Are Truly Horrible For People Who Have PTSD

20 Mar '2018 [Sound](#)

Noise is a really big issue for PTSD survivors: people who have mental health problems because of their traumas. How are they connected?

Almost everybody has experienced a trauma. But some traumas are more scarring than others and can even result in long-lasting mental disorders like **PTSD**, which can have an extreme impact on someone's life. It's a disorder that can develop in the brain after a horrifying experience, like war or a car crash.

Symptoms

The symptoms of PTSD are, to say the least, not pleasant. They range from nightmares about the traumatic events, disturbing thoughts and feelings, anxiety, trying to avoid anything that has something to do with the traumatic event, and an increase in the fight-or-flight response.

Around ten percent of the population suffers from PTSD, according to data from **NCBI**, a part of the US National Library of Medicine. And, remarkably enough, that percentage is the same for people who suffer from tinnitus (the sound of a constant beep in your ears). The NCBI clearly sees a link between the two.

PTSD survivors also suffer from the Exaggerated Startle Syndrome, with anxiety and actions in an extreme and irrational way too loud noises and bangs. And then there are the sounds that remind them of the sounds during the traumatic events, which can trigger memories of the



Fear

PTSD can also cause a general fear of sounds: phonophobia, or a fear of some specific sounds: misophonia. Survivors of the disorder also are generally much more sensitive to sounds and perceive them as much louder than other people would.

All of this makes the life of people with PTSD very hard. If you think you are suffering from this, consult your doctor. Really, please do it. For yourself, and for the ones you love.

Do you have PTSD and would you like to tell your experiences to us? We are always very open and interested to hear what you have to say. And again: if you haven't done it yet, visit your doctor, please. Thank you!

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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

In everyday life, cognitive tasks are often performed in the presence of task-irrelevant environmental noise. Accordingly, numerous studies on noise effects on performance have been conducted since the middle of the 20th century (for reviews see Hellbrück and Liebl, 2007; Szalma and Hancock, 2011), showing that—depending on characteristics of sounds and tasks—noise of low to moderate intensity may in fact evoke substantial impairments in performance.

Most of these studies were conducted with adults. The present review, however, will focus on studies including children. Children are especially vulnerable to harmful effects of environmental noise, as cognitive functions are less automatized and thus more prone to disruption. We will report findings concerning effects of acute noise on performance in concurrent auditory and non-auditory tasks, as well as effects of chronic noise on children's cognitive development.

Effects of acute noise on children's performance in auditory tasks

Psychoacoustic studies have consistently shown that children's speech perception is more impaired than adults' by unfavorable listening conditions. The ability to recognize speech under conditions of noise or noise combined with reverberation improves until the teenage years (Johnson, 2000; Wightman and Kistler, 2005; Talarico et al., 2007; Neuman et al., 2010). With stationary noise makers, signal-to-noise ratios (SNRs) have to be 5–7 dB higher for young children when compared to adults in order to achieve comparable levels of identification of speech or nonspeech signals, with adult-like performance reached at about 6 years of age (Schneider et al., 1989; Fallon et al., 2000; Werner, 2007). However, with maskers that vary over time, i.e., with trial-by-trial variation of the maskers' spectral composition (Oh et al., 2001; Hall et al., 2005; Leibold and Neff, 2007) or with fluctuating maskers such as single-talker speech (Wightman and Kistler, 2005), adult-like performance is usually not reached before the age of 10 years. Furthermore, children are less able than adults to make use of spectro-temporal and spatial cues for separation of signal and noise (Wightman et al., 2003; Hall et al., 2005). These findings demonstrate that children are especially prone to *informational* masking, i.e., masking that goes beyond energetic masking predicted by filter models of the auditory periphery.

Studies identified a range of linguistic and cognitive factors to be responsible for children's difficulties with speech perception in noise: concerning the former, children are less able than adults to use stored phonological knowledge to reconstruct degraded speech input. This holds for the level of individual phonemes, as children's phoneme categories are less well specified than adults' (Hazan and Barrett, 2000), but also for the lexical level since children's phonological word representations are more holistic and less segmented into phoneme units. Therefore the probability of successfully matching incomplete speech input with stored long-term representations is reduced (Nittrouer, 1996; Metsala, 1997; Mayo et al., 2003). In addition, young children are less able than older children and adults to make use of contextual cues to reconstruct noise-masked words presented in sentential context (Elliott, 1979). Concerning attention, children's immature auditory selective attention skills contribute to their difficulties with speech-in-noise perception. Children's susceptibility to informational masking has been attributed to deficits in focusing attention on auditory channels centered on signal frequencies, while ignoring nonsignal channels (Wightman and Kistler, 2005). Behavioral and ERP measures from dichotic listening paradigms provide evidence that auditory selective attention improves throughout entire childhood (Doyle, 1973; Pearson and Lane, 1991; Coch et al., 2005; Wightman et al., 2010; Gomes et al., 2012).

Owing to the mediating role of linguistic competence and selective attention, children with language or attention disorders are still more impaired than normally developing children by noise in speech perception tasks (Geffner et al., 1996; Ziegler et al., 2005, 2009). A stronger noise effect is also evident for children tested in their second language when compared to native children (Crandell and Smaldino,

Autism & Anxiety: Parents seek help for extreme reaction to loud noise

September 5, 2018

Our 12-year-old son has autism, mild intellectual disability and anxiety attacks so severe that we end up in the emergency room. Loud noises are the worst – for example the school fire alarm, thunderstorms, a balloon popping, fireworks. Any help would be greatly appreciated.



This week's "Got Questions?" answer is by Judy Reaven, a clinical psychologist and associate professor of psychiatry and pediatrics at the University of Colorado School of Medicine and Children's Hospital Colorado, in Denver. Dr. Reaven's conducted research on the effectiveness of cognitive-behavioral therapy for anxiety in adolescents with autism, with the support of an [Autism Speaks research grant](#).

Editor's note: The following information is not meant to diagnose or treat and should not take the place of personal consultation, as appropriate, with a qualified healthcare professional and/or behavioral therapist.

Thanks for the great question. It certainly sounds like your family is experiencing a very difficult situation. Anxiety symptoms and reactions are very common in individuals with autism spectrum disorder (ASD). They can interfere with functioning across home, community and school settings.

Although your son's reaction sounds more severe than most, many people with autism struggle with a range of fears, phobias and worries. These can range from a debilitating fear of, say, spiders or the dark to chronic anxiety about making mistakes or being late.

Fortunately, recent research suggests that anxiety in children and adults who have autism is quite treatable. Often, these individuals are helped by the same or similar strategies that work well in treating anxiety in the general population.

These approaches include cognitive behavior therapy, or CBT. Cognitive-behavioral approaches are well-established, evidenced-based treatments that have become the gold standard of psychosocial treatments for anxiety. [My own research](#) and that of my colleagues has demonstrated the helpfulness of modifying cognitive-behavioral approaches to address the special needs of those who have autism.

Where to begin?

You describe a number of fears that may be related to sensory sensitivities. I recommend that you begin by consulting an occupational therapist who can assess whether your son's extreme sensitivities to noises are part of a broader sensory processing disorder. If this is the case, and if your son's fears are exclusively triggered by sensory stimuli, then his symptoms may be best addressed by a sensory-focused intervention. Many occupational therapists who specialize in autism receive special training in this area.

It's common for children with ASD and anxiety to become extremely frightened in response to sensory stimuli. Perhaps – like many individuals with autism – your son also has difficulty telling you what's scaring him. Instead, he may show his fear with extreme avoidance of a situation.

Avoidance versus learning to cope

Tackling one fear at a time

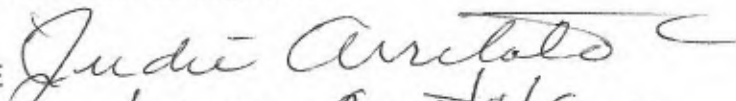
Graded exposure

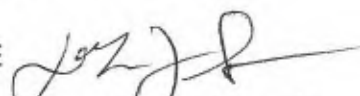
I wish you and your son the very best. Please let us know how you're doing with an email to GotQuestions@autismspeaks.org.

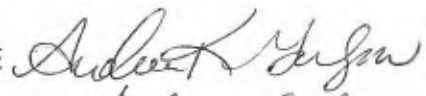
Additional Resources & Tools


Parents Seek Help: Child with Severe Autism Eats Only Sweets


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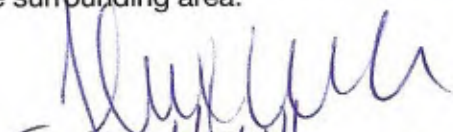
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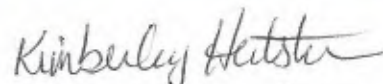
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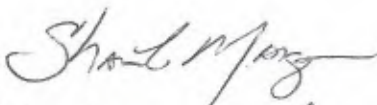
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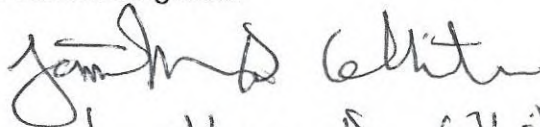
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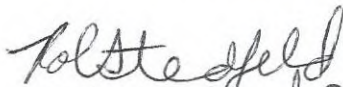
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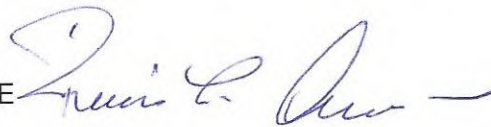
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE

PRINTED NAME

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SIGNATURE *Damon Sexton*
PRINTED NAME *Damon Sexton*
ADDRESS *401 Balsa St La Grande, OR 97850*
EMAIL *sexton.damon@gmail.com*

SIGNATURE *Coy Sexton*
PRINTED NAME *Coy Sexton*
ADDRESS *401 Balsa Street, La Grande, OR 97850*
EMAIL *coytris@gmail.com*

SIGNATURE *Melinda McGowan*
PRINTED NAME *Melinda McGowan*
ADDRESS *602 Sunset Dr.*
EMAIL *melindamegowan@gmail.com*

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Lois Barry*
PRINTED NAME LOIS BARRY
ADDRESS P.O. BOX 566, LA GRANDE, OR 97850
EMAIL loisbarry31@gmail.com

SIGNATURE *Cathy Webb*
PRINTED NAME CATHY WEBB
ADDRESS 1700 Cedar St. LA GRANDE, OR 97850
EMAIL thinkski@gmail.com

SIGNATURE *JoAnn Marlette*
PRINTED NAME JOANN MARLETTE
ADDRESS 2031 Court St. #8, Baker City, OR 97814
EMAIL joannmarlette@yahoo.com

SIGNATURE *Keith D. Hudson*
PRINTED NAME Keith D. Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL Keithdhudson@gmail.com

SIGNATURE *Laura Elly Hudson*
PRINTED NAME Laura Elly Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL ellyhudson@gmail.com

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Lynn Wheeler Duncan*
PRINTED NAME LYNN WHEELER DUNCAN
ADDRESS 489 Modelaire Drive, LaGrande OR 97850
EMAIL ylw1910@gmail.com

SIGNATURE *Gary D. Pierson*
PRINTED NAME Gary D. Pierson
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL -

SIGNATURE *Anne G. Carinato*
PRINTED NAME Anne G. Carinato
ADDRESS 86 Hawthorne Dr. La Grande OR 97850
EMAIL acavinat@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR 97850
EMAIL joehorst@con.com

SIGNATURE *Angela Sherer*
PRINTED NAME Angela Sherer
ADDRESS 91 W. Hawthorne Dr La Grande, OR 97850
EMAIL asherer@frontier.com

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE

Merle E Comfort

PRINTED NAME

MERLE E COMFORT

ADDRESS

209 SWAPLO LA GRANDE OR 97850

EMAIL

merlecomfort@gmail.com

SIGNATURE

Robin L. Maille

PRINTED NAME

Robin Maille

ADDRESS

401 Cedar St., La Grande

EMAIL

rmaille@icloud.com

SIGNATURE

Carol S. Summers

PRINTED NAME

CAROL S. SUMMERS

ADDRESS

2811 Bekelen Lane La Grande OR.

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carolsummers1938@gmail.com

SIGNATURE

Caroline Kaye Juniper

PRINTED NAME

Caroline Kaye Juniper

ADDRESS

406 4th Street - LaGrande - OR 97850

EMAIL

SIGNATURE

Gerald D. Juniper

PRINTED NAME

Gerald Darwin Juniper

ADDRESS

406 4th St. LaGrande, OR. 97850

EMAIL

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
ADDRESS 970 Hawthorne Dr, La Grande, OR 97850
EMAIL asherer@frontier.com.

SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
ADDRESS 492 Madeleine Dr. La Grande, OR 97850
EMAIL hnull@conic.com

SIGNATURE *Bert R. Freewing*
PRINTED NAME Bert R. Freewing
ADDRESS 709 South 12th Street La Grande, OR 97850
EMAIL jeanfrewing@gmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

ESTERSON Sarah * ODOE

From: Vickie Braun <vicbraun57@gmail.com>
Sent: Thursday, August 22, 2019 4:11 PM
To: B2H DPOComments * ODOE
Subject: Subject line : Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019.

I am writing in regards to the Idaho power application for a site certificate for the Boardman to Hemingway transmission project.

Having lines run over a residential home and having that much power over head is not right!! My grandson Hayden lives there right now where these powerlines are going to be put. I do not want to have 500 kV lines running over the top of his home where he is living. This is dangerous and unsightly to mention!

They have plans for a new home on the property you are trying to put the lines up on.

Having power lines that big by residential and soon to be recreational property with people should not be allowed.

Please do not erect these on this property!

Sincerely

Vickie Braun

Grandmother to Hayden

ESTERSON Sarah * ODOE

From: Vickie Braun <vicbee57@msn.com>
Sent: Thursday, August 22, 2019 4:26 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

I am a grandmother to one of the residents directly impacted by your plans. My grandson lives right where these power lines are going to be erected.

He deserves to live without toxic power lines over head. 500 kilovolt is dangerous to have by residential homes and property to be turned into recreational camping area.

EFSC Must Deny the Site Certificate!

Sincerely

Steve Braun
1374 S 360 W
Payson UT 84651
801-367-4767

Get [Outlook for iOS](#)

RECEIVED

AUG 22 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

DEPARTMENT OF ENERGY

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre.

They value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the figures they claim apply or the basis for the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicants claims that the land in the right of way will have a further reduced due to the opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive. It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for ¼ mile (1,320 ft.) of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing ¼ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence. In other words, the cost of fencing an acre of lost forest land would exceed the value the applicant claims the land would add to the local economy per acre for the 50 years the

transmission line is predicted to be in place.

The applicant also claims that the transmission line right of way through forest lands will not cause a substantial change in accepted forest practices or cause a significant increase in the cost of accepted forest practices on either lands to be directly impacted by the Project or on surrounding lands.

Removing trees from land currently being used to grow them will create a substantial change in accepted forest practices. It also will substantially increase the costs of growing and harvesting trees on the surrounding lands. The transmission line will make it impossible to use aerial equipment to harvest trees on steep hillsides adjacent to the line, it will increase time and costs of harvest due to the need to avoid equipment contact with the transmission lines, avoid trees falling on the transmission lines, require the use of routes of access and egress from the forested lands that avoid having log trucks and equipment moving below the transmission lines, will decrease the harvest along the transmission line due to loss of trees in forest land adjacent to the corridor due to wind and weather conditions causing the loss of additional trees due to weakened root infrastructure once the transmission corridor is cleared.

The economic, social and environmental impacts of running this transmission line through private forest lands in Union and Umatilla Counties are understated, lack convincing documentation, and the conclusions stated by the applicant in Section 8.0 are absolutely false. Farm and forest lands in Eastern Oregon form the basis of our economic and social well being. This developer shows a complete lack of understanding of the significance this transmission line destruction of forested lands will have on the well being of the citizens.

In addition, the applicant has failed to provide documentation to support their comments. The only reference the applicant sites that in any way relates to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; They have failed to document that they comply with OAR 345-022-0030; and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

There is no justification for determining that the proposed plan to destroy forested lands meets the requirements under OAR 345-022-0000(1)(a) which states "The facility complies with the requirements of the Oregon Energy Facility Siting statutes, ORS 469.300 to 469.570 and 469.590 to 469.619 and the standards adopted by the Council pursuant to 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 as described in section (2)."

While it will be addressed in other comments, the cumulative adverse effects of the destruction of forest lands will have significant impacts on not only the economic and social well being of the citizens of Union and Umatilla Counties, but it will also adversely effect Critical Wildlife habitat, Threatened and Endangered Species, increase the potential for wildfire, stress local services, as well as multiple additional resource and interests of concern to the citizens.

LISA K BRIDGE

60905 PIERCE RD

LA GRANDE, OR. 97450

Lisa K Bridge

Brown DWR
53313 Hwy 203
Lewiston, OR
97883

RECEIVED
AUG 22 2019
Department of Energy

c/o Kellen Tardewether
Senior Siting Analyst
O.D.Energy
550 Capital St NE
Salem, OR 97301

57301-374259



PORTLAND OR 972
20 AUG 2019 PM 3 L



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POST OFFICE MURALS / FOREVER / USA

Kellen Tardaewether
Ore Dept. of Energy
550 Capital St NE
Salem, OR 97301

Ann Brown
53313 Hwy 203
Union, OR 97883

Aug 19, 2019

Dear Gentlpersons,

I have written before, and I write again. I do not believe the proposed Boardman to Hemmingway powerline is needed. I do not believe it is in the best interests of the American people. It is not in the best interests of Oregonians, and it especially harms the people and critters of Northeast Oregon.

Whereas other power companies have found it fruitful to generate new power using conservation (eg. rebates for heating/cooling technologies, simple inexpensive insulation, better windows and lighting) Idaho Power has simply ignored these options. Instead, it seems fixed on the idea that our only future is to litter the landscape with hideously ugly towers and powerlines.

Rate-payers will pay, shareholders will reap the gains, and all of us who have eyes will suffer, as will native plants and wildlife.

I am a strong advocate of climate-friendly alternatives to fossil fuels. The 2 degree climate difference that our current president tells us is insignificant is glaringly significant here. We tree farm 4 miles and 1000' elevation from the sagebrush

fringe. I am watching mixed conifer/ponderosa pine woodland transition to sagebrush in my lifetime. Nature did not hang out a sign saying "climate change happening here." But witness: Where did that Juniper seedling come from? What is killing all of these white fir? What I call "Food-dryer wind" has fed megafires all around us. It doesn't take a rocket scientist to say that we are in trouble.

We need power generated close to users to minimize transmission losses.

We need power that comes from sources that are friendly to native species. Solar and wind facilities need to be in areas that are already biological deserts (e.g. wheatfields, not raptor-friendly ridgetops, and already-impacted sites (rooftops, highways, and brownfields)) We need to reward power companies that insist on these priorities.

Science has allowed us to feed and cloth massively increasing human population. Now science (doesn't matter which "ology" one might choose to look at - climate, life sciences, marine/terrestrial, polar, tropical, soils, etc.) the consensus is overwhelming. We have and continue to soil our own nest to the point of no return, and must put sustainable practices ahead of shareholder profit.

Idaho Power has demonstrated no commitment to any kind of sustainable future. It has demonstrated a firm commitment to shareholder profits. That is not good reason to build BH2.

Thank you
Ann Brown
53313 Hwy 203
Union, OR 97883
541-853-2328

TARDAEWETHER Kellen * ODOE

From: Jordan Brown <jordanisbrown@gmail.com>
Sent: Thursday, August 22, 2019 11:33 AM
To: TARDAEWETHER Kellen * ODOE
Subject: Idaho Power Amended Application for the Boardman to Hemingway Transmission Project dated 9/28/2018; Draft Proposed Order dated 5/22/2019

Dear Chair Beyeler and Members of the Council;

My comments concern Idaho Power's poorly developed and possibly illegal "Noxious Weed Plan" (DPO Attachment P 1-5) as well as their failure to take into account in any way, the Oregon Conservation Strategy.

The Oregon Conservation Strategy <http://oregonconservationstrategy.org/overview/> is critical for protecting the natural heritage of our state. It *"represents Oregon's first overarching state strategy for conserving fish and wildlife. It uses the best available science to create a broad vision and conceptual framework for long-term conservation of Oregon's native fish and wildlife, as well as various invertebrates, plants, and algae. The Conservation Strategy emphasizes proactively conserving declining species and habitats to reduce the possibility of future federal or state listings. It is not a regulatory document but instead presents issues, opportunities, and recommended voluntary actions that will improve the efficiency and effectiveness of conservation in Oregon."*

Under the Oregon Conservation Strategy, IPC's B2H project is a Key Conservation Issue: *"(KCI)s are large-scale conservation issues or threats that affect or potentially affect many species and habitats over large landscapes throughout the state."*

Despite being a Key Conservation Issue, the Oregon Conservation Strategy and its Goals, are not mentioned in IPC's Application at all! Consider Land Use Planning Goal 1: *Manage land use changes to conserve farm, forest, and range lands, open spaces, natural or scenic recreation areas, and fish and wildlife habitats.* Neither the current Proposed Route nor Morgan Lake Alternative of IPC's Application to EFSC takes these into account! Even if we ignore the fact that the B2H Project likely is not needed at all, given lowered demand and improved technology of energy storage batteries—IPC intends to disregard the "Proposed Route" considered in the BLM/USFS Records of Decision. That "Proposed Route" was chosen by the agencies as being the least harmful to the greatest list of resources—yet IPC has abandoned that in favor of two other routes imminently MORE harmful and despised by MOST residents of Union County. Is Goal 1 being met when the B2H line goes less than 100 feet from Twin Lake, a gem of a wetland that deserves protection? Is Goal 1 being met when B2H goes through Rice Glass Hill property, proposed as a State Natural Area? Is Goal 1 being met when noxious weeds are spread by B2H through Union County's finest wet meadows and elk wintering habitat?

No, Goal 1 one is not being met. Another very specific example is 5 State listed rare plant species (DPO Exhibit Q) within the B2H "analysis area". IPC claims "only" two of these rare species (Mulford's milkvetch and Snake River goldenweed) will suffer "direct impacts", by blading with heavy equipment. IPC claims that, "Avoidance and minimization measures ...described in Section 3.5.4" will "mitigate" impacts. Upon reading 3.5.4 we find that this consists of "minimum buffer of 33 feet between the disturbance and the edge of the T&E occurrence". Habitat for these plants will be completely fragmented and a buffer of 33 – or even a few hundred--feet will not stop invasion by noxious weeds! These species will suffer irreparable damage under B2H. The Oregon Conservation Strategy rightly recognizes, "Invasive species are the second-largest contributing factor causing native species to become at-risk of extinction in the United States."

To delve further into rare plants slated for damage by B2H, *Trifolium douglasii* is a USFWS "Species of Concern" <https://www.fws.gov/oregonfwo/Documents/OregonSpeciesStateList.pdf> yet not even considered in IPC's 3.5 "Avoidance to Minimize Impacts". Although List 1 under ORBIC's latest ranking <https://inr.oregonstate.edu/orbic/rare-species/ranking-documentation/vascular-plant-ranks> it is not shown as State listed Threatened or Endangered, so is

ignored by IPC. Species of Concern are “Taxa whose conservation status is of concern to the U.S. Fish and Wildlife Service (many previously known as Category 2 candidates), but for which further information is still needed.” Douglas clover has a global rank of G2 “*Imperiled because of rarity or because other factors demonstrably make it very vulnerable to extinction (extirpation), typically with 6-20 occurrences*”. DPO Exhibit P Part 2b Appendix 3A and 3B Figure 9 of 23 shows Douglas clover directly on the Morgan Lake alternative! This is not even taking into account that areas of private land where access was not granted for survey, likely contain additional occurrences of Douglas clover. The area is THE main place where this rare plant grows in Oregon, and B2H is set to permanently alter and compromise its main habitat with weeds!

Another very obvious lack is IPC’s failure to discuss Strategy Habitats, outlined in Oregon’s Conservation Strategy:

<http://oregonconservationstrategy.org/strategy-habitats/strategy-habitats-summary-by-ecoregion/>.

In Union County alone, the Strategy Habitats of Grasslands, Late Successional Mixed Conifer Forest, and Ponderosa Pine Woodlands would very obviously be impacted by B2H as proposed in the Application.

The Application also neglects to address Strategy Species under OCS “*The Conservation Strategy identifies 294 Strategy Species, which are Oregon’s “Species of Greatest Conservation Need”. Strategy Species are defined as having small or declining populations, are at-risk, and/or are of management concern.*” This is completely unacceptable! How can an action set to devastate so many of Northeast Oregon’s Strategy Habitats and Species not even respond to our State Conservation Strategy?

Moving on to invasives, IPC’s “Noxious Weed Plan” is greatly lacking. As noted above, it is a threat to Oregon’s native plant communities. Oregon’s Conservation Strategy states “*Invasive non-native species can have many negative consequences throughout Oregon. Depending on the species and location, invasive plants can:*

- *affect food chain dynamics*
- *change habitat composition*
- *increase wildfire risk*
- *reduce productivity of commercial forestlands, farmlands, and rangelands*
- *modify soil chemistry*
- *accelerate soil erosion*
- *reduce water quality”*

Chapter 569 of Oregon law covers weeds. Oregon statute 569.180 (Noxious weeds as public nuisance policy) states, “In recognition of the imminent and continuous threat to natural resources...noxious weeds are declared to be a public nuisance and shall be detected, controlled and, where feasible, eradicated on all lands in this state.”

Upon careful reading, “Noxious Weed Plan” breaks the law by exempting IPC from weed control after 5 years, denying responsibility for Class B and C Weed species (the vast majority of weeds), and holding IPC accountable for only the very limited area of ROW, despite the B2H project introducing and spreading weeds far and wide along a 300 mile stretch plus dozens of additional access roads and tensioning areas.

In summary, IPC’s Application does not take into account the Oregon Conservation Strategy. The Application clearly is breaks Goal 1 of the Strategy in many ways; additionally the Application imperils a Federal “Species of Concern”, and does not consider Strategy Habitats or Strategy Species. IPC’s Noxious Weed Plan does not comply with Chapter 569 of Oregon law. I strongly urge you to deny IPC’s Application. Our State Conservation Strategy and Goals and the integrity of our native plant habitats and rare plant occurrences cannot be sacrificed!

Sincerely,

Jordan Brown

1440 SE Vica Way

Corvallis, OR 97333

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_ _ * _ O _
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